

Karara Mining Limited

Department of Water and Environmental Regulation Ministerial Statements 805, 806 & 968 Annual Compliance Assessment Report 2024

CORP-EN-REP-1191

30 August 2024

CORP-EN-REP-1191 KARARA MINING LIMITED


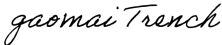
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ABBREVIATIONS

Abbreviation	Definition
ACAR	Annual Compliance Assessment Report
ARC	Australian Research Council
BHN	Blue Hills North
CAP	Compliance Assessment Plan
CEO	Chief Executive Officer
CMSR	Centre of Mine Site Restoration
CQ	Control Quadrat
DBCA	Department of Biodiversity, Conservation and Attractions
DCCEEW	Department of Climate Change, Energy, Environment and Water
DEMIRS	Department of Energy, Mines, Industry Regulation and Safety (formerly DMIRS)
DMIRS	Department of Mines, Industry Regulation and Safety
DWER	Department of Water and Environmental Regulation
EMS	Environmental Management System
EPAS	Environmental Protection Authority Services
EPBC Act	Environment Protection and Biodiversity Conservation Act
GD	Ground Disturbance
GIS	Geographical Information System
HIN	Hinge
HIOP	Hinge Iron Ore Project
INX	Incident Reporting System
KAR	Karara
KIOP	Karara Iron Ore Project

Abbreviation	Definition
KML	Karara Mining Limited
LIC	Linear Infrastructure Corridor
MCP	Mine Closure Plan
MLE	Mine Life Extension
MIOP	Mungada Iron Ore Project
MS805	Ministerial Statement 805
MS806	Ministerial Statement 806
MS968	Ministerial Statement 968
NATA	National Association of Testing Authorities
NIR	Near Infra-Red
OEPA	Office of the Environmental Protection Authority
PAF	Potentially Acid Forming
PEC	Priority Ecological Community
The Project	Greater Karara Iron Ore Project
RGB	Red Green Blue
ROM	Run-of-Mine
SbTS	Shield-backed Trapdoor Spider
TDS	Total Dissolved Solids
TPD	Terapod
Translocation Plan	KML Environmental Plan - Translocation Proposal – <i>Acacia Woodmaniorum</i> (Fabaceae) (CORP-EN-PLN-1007)
TSF	Tailings Storage Facility
WA	Western Australia
WRD	Waste Rock Dump

Abbreviation	Definition
WStS	Western Spiny-tailed Skink

1 INTRODUCTION

This Annual Compliance Assessment Report (ACAR) has been prepared in accordance with the requirements of Condition 4.6 of Ministerial Statement No. 805 (MS805) – Karara Iron Ore Project (KIOP), No. 806 (MS806) – Mungada Iron Ore Project (MIOP) and No. 968 (MS968) – Hinge Iron Ore Project (HIOP). Collectively KIOP, MIOP, and HIOP form the ‘Greater Karara Iron Ore Project’ (the Project).

This is the fifteenth ACAR prepared by Karara Mining Limited (KML) for KIOP and MIOP, and the tenth ACAR prepared for HIOP. To satisfy conditions 4.1 and 4.2 of the Ministerial Statements, KML has prepared and submitted Compliance Assessment Plans (CAPs) for the Statements to the Department of Water and Environmental Regulation (DWER). The CAPs govern the compliance of the Ministerial Statements and are used as the template for this report. The CAPs for KIOP, MIOP and HIOP were revised on 16 June 2020 and were approved by DWER on 30 July 2020.

This ACAR combines the requirements of MS805, MS806 and MS968 and has been prepared in accordance with the approved CAPs. The ACAR addresses compliance with Ministerial Conditions for the reporting period (1 July 2023 – 30 June 2024 for MS805 and MS806 and 4 June 2023 – 3 June 2024 for MS968).

2 PROJECT SUMMARY AND STATUS

The Project is comprised of three mining projects: KIOP, MIOP and HIOP (Figure 1).

2.1 Karara Iron Ore Project (KIOP)

KIOP is a magnetite mining and processing operation located 215km east-southeast of Geraldton and 320 km north-northeast of Perth (Figure 1). The Project commenced in 2010 with a project life of at least 40 years and continues to be actively mined.

KIOP consists of a single open pit, a beneficiation processing plant, tailings storage facilities (TSF), accommodation facilities and a Linear Infrastructure Corridor (LIC) containing the raw water pipeline towards the Yandanooka borefield and access road to Morawa (Figure 2).

2.2 Mungada Iron Ore Project (MIOP)

MIOP is a hematite mining operation, which encompasses three open pits and one backfilled pit in two areas (Blue Hills North [BHN] and Terapod [TPD]). BHN consists of a single open cut mining pit. TPD consists of two open pits, and the third pit has been backfilled to surface and rehabilitated (Figure 3). MIOP also includes the Tilley Siding and a 330 kV power transmission line between the mine site and Koolanooka.

Active mining operations at BHN ceased in July 2013 and mining ceased at TPD in March 2014. All inactive areas have been rehabilitated at MIOP, including all waste dumps and run of mine (ROM) pads.

In a letter dated 24 May 2017, the Office of the Environmental Protection Authority (OEPA) determined that MIOP entered into its closure phase officially on 25th March 2014 (being the date that productive mining ceased at Terapod). In the same letter, OEPA advised the following:

- KML are to continue to monitor and record Declared Rare Flora and Priority Flora species and vegetation condition as defined by Keighery (1994) on the Blue Hills Range, and feral animals in the proposal area and continue to provide an annual report on the monitoring results to the OEPA and DMIRS as required by Condition 11-2.
- The long-term management of the MIOP pit lake is to be submitted by 25th March 2019 as required by Condition 11-3; and
- Annual monitoring and reporting of vegetation in rehabilitated areas is to continue and that completion criteria as detailed in Condition 11-1(1) is to be met by 25th March 2019.

Monitoring results are further discussed in Section 6 of this report.

Although MIOP was determined to be in closure, some infrastructure at MIOP is actively supporting mining operations at KIOP. Active areas not rehabilitated and currently in use include:

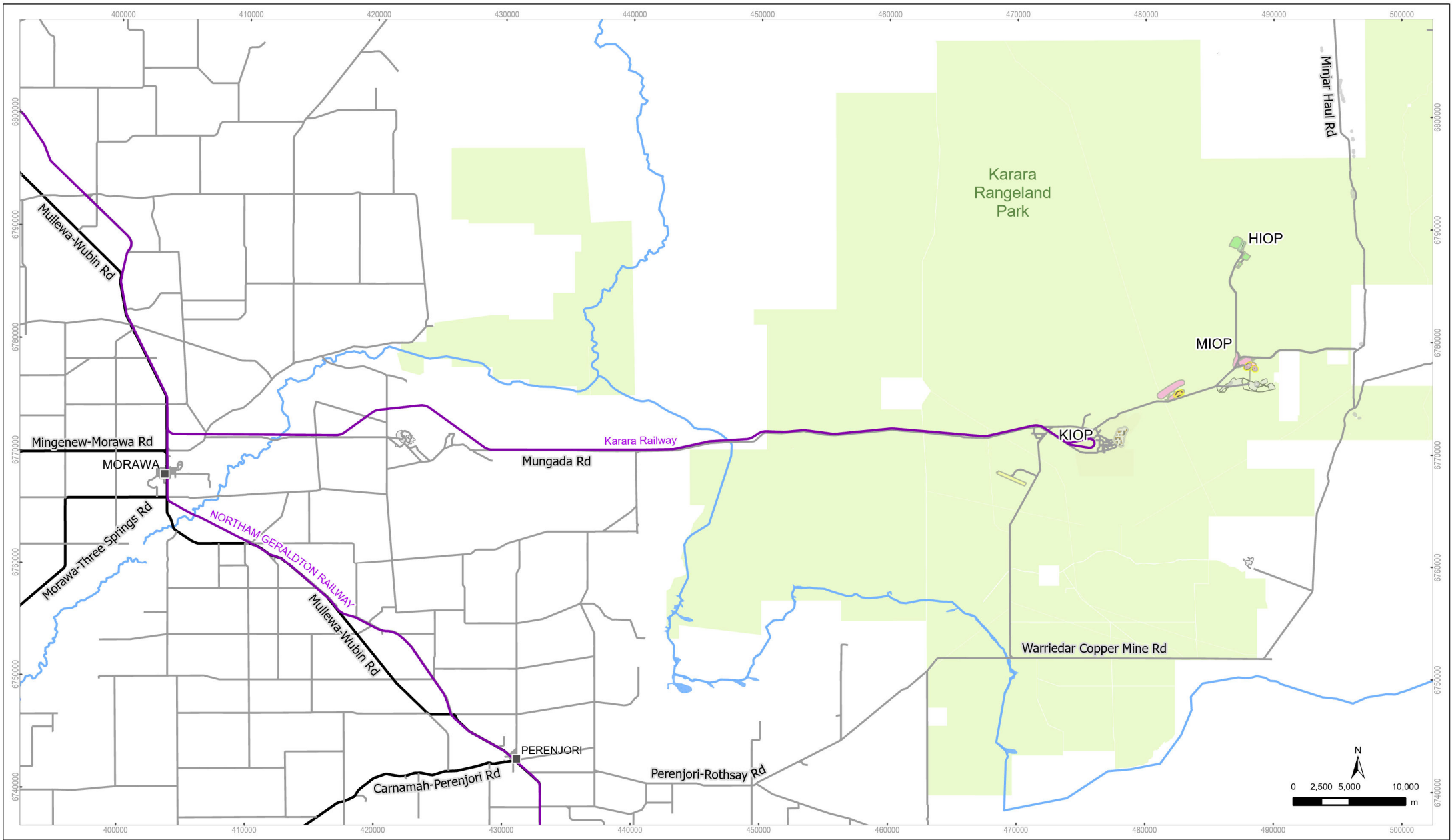
- Blue Hills workshop and laydowns at which are used as a mines emergency response training area;
- Terapod open pits are used as a water source to support KIOP and Terapod West pit is currently used to store dewatering from Karara pit;
- Blue Hills North open pit is used to store saline dewatering from Karara pit;
- Blue Hills North and Terapod turkey's nests; and
- Production bores, pipelines, and access roads.

These areas are not scheduled to be rehabilitated until the closure of the KIOP, or when they are no longer needed to support mining operations at Karara.

2.3 Hinge Iron Ore Project (HIOP)

HIOP is a hematite mining operation comprised of an open cut mining pit, which is currently in care and maintenance. Active mining operations ceased in January 2016 when the crushing and screening facility was removed and the majority of disturbed areas rehabilitated. Rehabilitation earthworks and revegetation have largely been completed, with the exception for infrastructure that continues to be used to support KIOP operations, such as laydown areas, water pipelines, ROM pad, and haul roads (Figure 4). Whilst operations have been suspended at HIOP, the ore resource has not been exhausted.

Figure 1: Project Location



MS Annual Compliance Report
(2024)

Project Regional Location

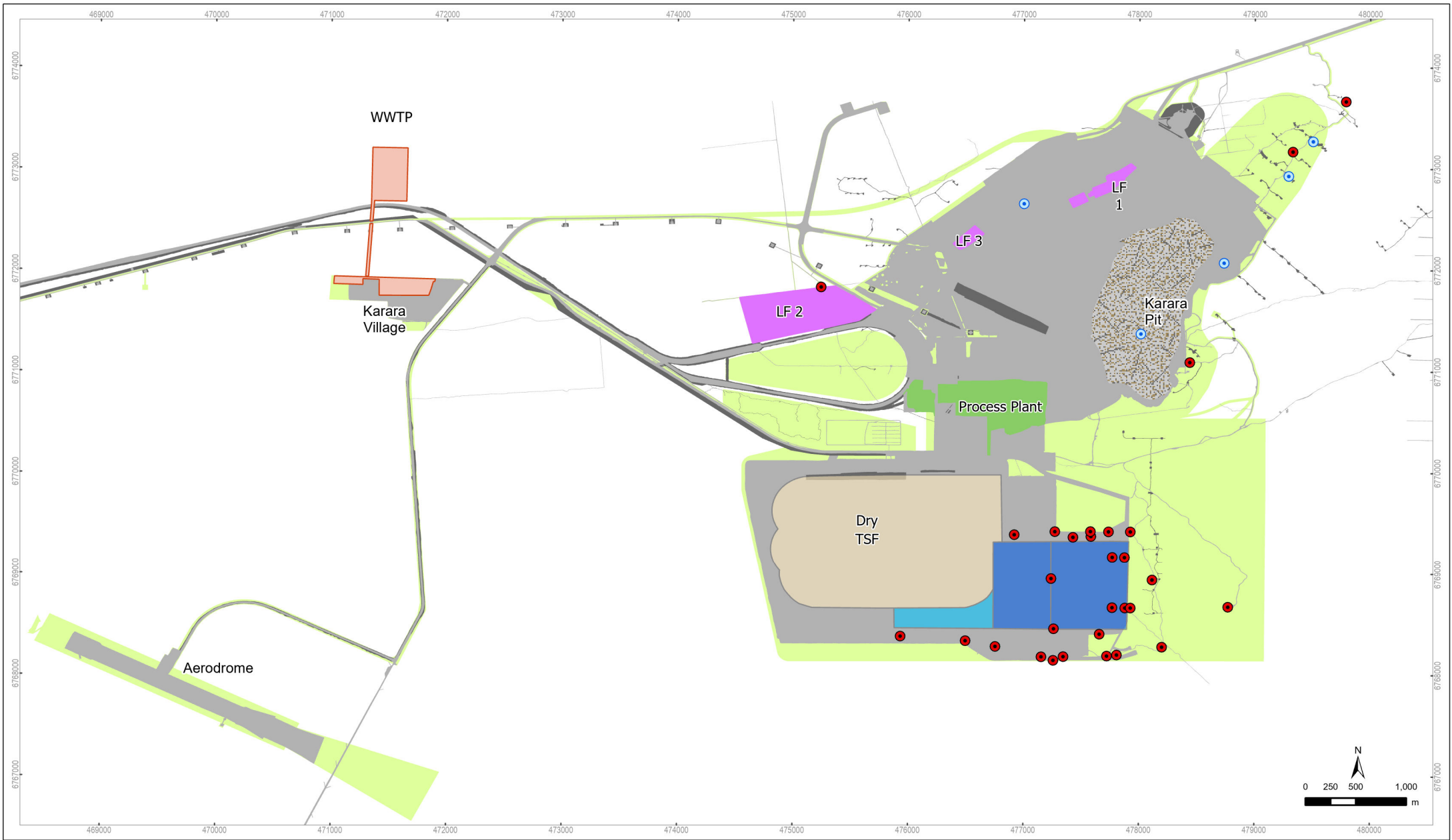
KARARA
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- Railway (Freight)
- Roads Regional
- Main
- Minor



Ref: K0170 F1 Proj: GDA94 MGAZ50
Version: A Scale: 1:450,000
1 August 2024 Size: A4

Figure 2: KIOP Site Features



MS Annual Compliance Report (2024)

KIOP Site Features



- Monitoring Bore
- Production Bore
- Mine Voids
 - Open Pit
 - Karara Village WWTP

- Landfill Site
- Process Plant
- Life Of Mine Plan
 - Dry TSF
 - Wet TSF (Closed)

- Wet TSF 2A
- Ground Disturbance ALL by Status
 - Open Ground Disturbance
 - Rehabilitation
 - KIOP MS 805



Ref: K0170 F2
Version: A
1 August 2024

Proj: GDA94 MGAZ50
Scale: 1:50,000
Size: A4

Figure 3: MIOP Site Features



MS Annual Compliance Report (2024)

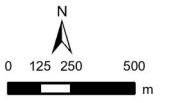
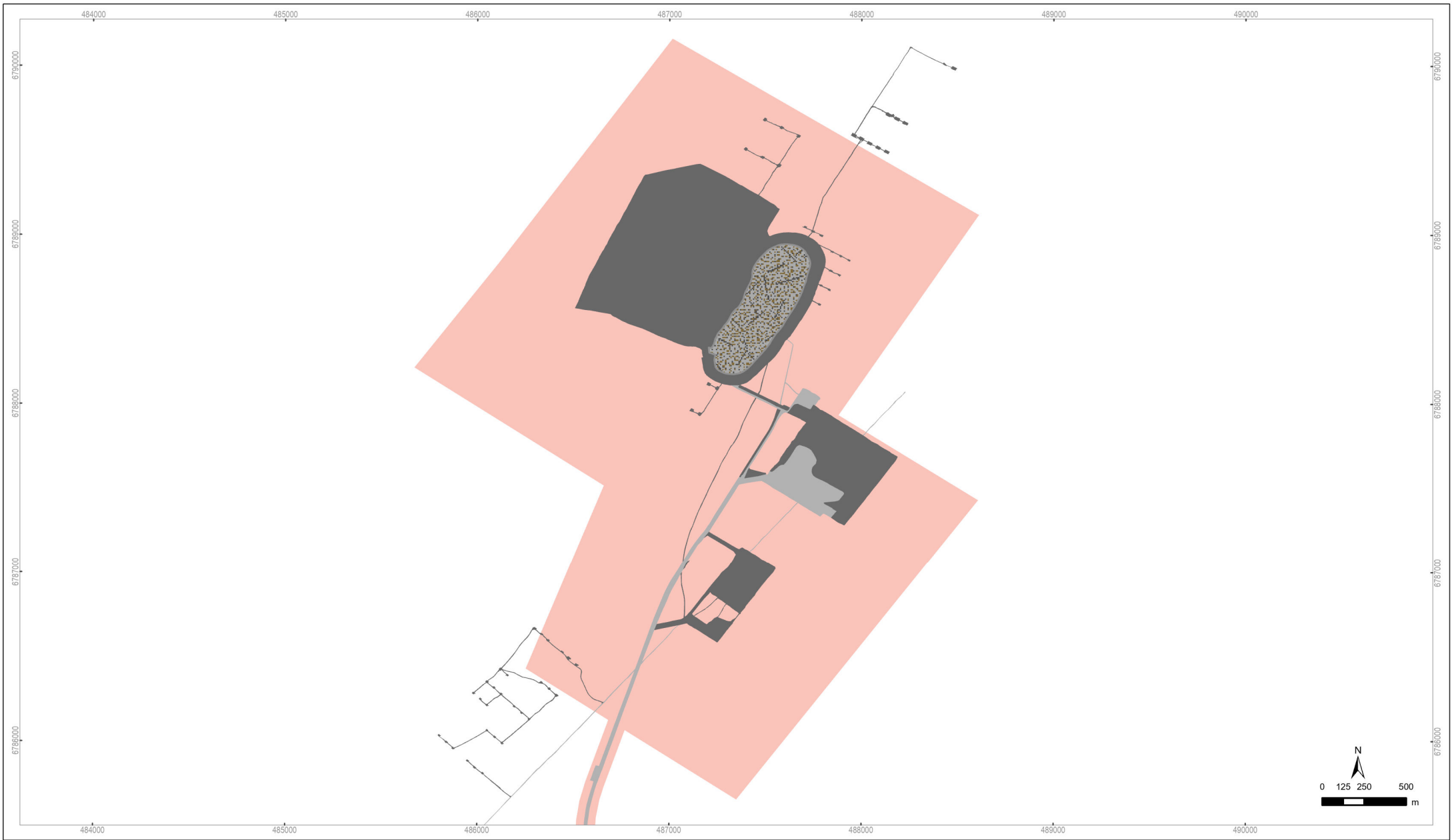
MIOP Site Features

- | | |
|----------------------------------|----------------|
| Abandonment Bund | Rehabilitation |
| Backfilled Pit | KIOP MS 805 |
| Open Pit | HIOP MS 968 |
| Ground Disturbance ALL by Status | |
| Open Ground Disturbance | MIOP MS 806 |



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 1 August 2024 Size: A4

Figure 4: HIOP Site Features




MS Annual Compliance Report
(2024)

HIOP Site Features


KARARA
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Mine Voids

 Open Pit

Ground Disturbance ALL by Status

 Open Ground Disturbance

 Rehabilitation

 HIOP MS 968



Ref: K0170 F4 Proj: GDA94 MGAZ50
Version: A Scale: 1:30,000
1 August 2024 Size: A4

3 KEY ENVIRONMENTAL IMPROVEMENTS

KML's Environment Policy requires KML to apply, maintain and continually improve an effective environmental management system to maintain compliance with obligations and enhance environmental performance. The current Environment Policy (revised in January 2023) is provided in Appendix A.

This section provides a summary of the research and trials conducted to improve KML's ability to monitor and rehabilitate areas impacted by mining activities.

3.1 Remote Sensing - 2023 Aerial Survey

An annual aerial survey (fixed wing aircraft) of the site was conducted in July 2023 to capture high resolution imagery over the rehabilitated area of the Project including waste rock dumps (WRDs) and analogue transect areas. The survey incorporated standard 5cm resolution three band red green blue (RGB) as well as Near Infra-Red (NIR, four band) to enable vegetation condition assessment. In addition, imagery was processed via photogrammetry to produce a 20cm Digital Elevation Model of the WRDs. This data set is intended to provide a baseline for a change detection assessment of vegetation going forward.

3.2 KML - ARC Centre for Mine Site Restoration Research Program

KML commenced a research partnership with Kings Park and Botanic Garden in 2014. This had evolved over time and was led by the Centre for Mine Site Restoration (CMSR) at Curtin University in partnership with Kings Park and Botanic Garden, the University of Western Australia, and other parties. The CMSR research program consisted of a number of projects directly relating to field and glasshouse or laboratory experiments examining techniques for the ecological restoration of the TSF. KML has utilised the outcomes of the research program to develop effective rehabilitation techniques for the long-term closure of the TSF. This research program concluded in late 2021 and a final report was submitted to the Australian Research Council in June 2023. The major findings of this research indicate that dry tailings pose specific challenges to the successful rehabilitation of native plant communities due to its unique physiochemical properties compared to reference soils. The preliminary results suggest that changes in tailings physiochemical properties could be very slow without ecological engineering inputs. Following the findings of the research program, KML completed the fifth and sixth rehabilitation trials (referred to as TSF05 and TSF06) on the northern wall of the dry-stack TSF in May 2021 and July 2023 respectively. The rehabilitation monitoring to date indicated that TSF05 and TSF06 were efficient to minimise erosion on the TSF slopes by application of more rocky materials (500 mm depth) in addition to the 200 mm BIF waste rock on the slope of the dry-stack TSF northern wall. The trial also continued assessing and

determining the most suitable seed mix to use to achieve successful restoration of the final TSF landform.

3.3 EPBC Listed Fauna Stress Monitoring

KML engaged Curtin University to undertake a four-year research program to evaluate threats, recovery strategies and managing stress levels of EPBC listed fauna – endangered Western Spiny-tailed Skink (WStS) (*Egernia stokesii badia*) and vulnerable Malleefowl (*Leipoa ocellata*) associated with mining activities. The whole Research Proposal was completed in December 2021, and the Final Report was provided to KML in February 2022.

The key highlights and findings of the research program are summarised below (Gagnon & Bateman, 2021):

- A backward projected species distribution model shows that much of the distribution of the Malleefowl available at the time of European settlement in Australia is now unsuitable for the species, meaning that populations that were once on the fringes, such as those at Karara, are now essential holdouts for the species;
- Based on preliminary analysis of camera trap data, the number and diversity of animals detected does not appear to be impacted by noise levels; and
- No robust patterns of metal, metalloid or trace element contamination in relation to proximity of Malleefowl mounds to Karara mine dry tailings was detected. The measured Lead (Pb) concentrations in soil samples from the Malleefowl mounds at Karara mine site are significantly lower than the guideline value. Consequently, these levels are not expected to cause adverse impacts to biota coming into contact with these sediments.

The findings of the research program were published in a range of local, national and international conferences and technical forums and online scientific journals.

3.4 *Acacia woodmaniorum* Translocation Plan

KML, in conjunction with DBCA, developed a Translocation Plan for the Threatened species *Acacia woodmaniorum*. The objective of the Translocation Plan is to:

- Determine which *A. woodmaniorum* translocation technique (planting cuttings or whole plants) results in greater *A. woodmaniorum* plant survival and recruitment, and thus inform whether either method is suitable for future translocations; and
- Determine if an *A. woodmaniorum* seed orchard can be successfully established from propagated seed in order to preserve genetic diversity and supplement the amount of propagation material available for future restoration.

KML established two translocation sites at the rehabilitated mine area of the Terapod North Pit (Site A) and the rehabilitated Blue Hills North (BHN) Waste Rock Dump (WRD) (Site C). Two different translocation techniques (i.e. planting cuttings or whole plants) were trialled at the two sites. A third site within the KML nursery facility (Site D) was established as an *A. woodmaniorum* seed orchard with plants propagated from seed salvaged from the Terapod population before mining operations in that area. However, the nursery facility was discontinued in 2021 due to the area being required for the expansion of the Karara WRD. The plants in the nursery were all relocated to the DBCA in Geraldton during September 2021. Monitoring of these sites is conducted annually in spring, and KML provides DWER, DBCA and DEMIRS with a report of the monitoring results by the end of each year.

During the reporting period the assessed health of *Acacia woodmaniorum* observed in the two translocations sites declined, although there were no additional deaths. There was an increase in the height at Site A for the cuttings plant and Site C for the salvaged plants, all other plants had an average decrease in height and there was not significant new growth compared to the previous year due to a season. The benchmark measure of interim success for the translocation of cuttings and salvaged plants 2-10 years from planting, as outlined in 'the proposal', was for a greater than 40% survival rate beyond the first year. At site A, the survival rate is still 100% for the cuttings, and 89% for the salvaged plants. At site C, the survival rate has declined to 54% for the cuttings, and 68% for the salvaged plants. Under the terms of the proposal, both sites and treatments are still considered as successful.

At site C, 17.8% of plants recorded seed and 67.8% were recorded as having flowers. At site A, 5% of the plants recorded seed and 45% were recorded as having flowers. This indicates the reproductive potential of the translocated plants remains high. For the total plants, 41.6% had neither flower or seeds.

KML continues to work with the DBCA during the implementation of the Translocation Plan to ensure its successful outcomes.

The next annual monitoring is scheduled to be conducted in September 2024, and the next report is scheduled to be submitted by the end of the year.

4 PROJECT APPROVALS

The formal assessment of the KIOP Mine Life Extension (MLE) Proposal (the Proposal) under Part IV of the *Environmental Protection Act 1986* (EP Act) (at an assessment level of 'Assess - Referral Information with additional information required under s40(2)(a) and public review s40(5)') continued during the reporting period. The Proposal was also referred to the Commonwealth Department of Climate Change, Energy, Environment and Water (DCCEEW) under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 31 May 2023 and the DCCEEW decided that the Proposal is a 'Controlled Action' under s75 of the EPBC Act on 1 September 2023. The DCCEEW and the Environmental Protection Authority (EPA) agreed on the accredited assessment approach for the Proposal. The EPA issued a s40(2)(a) notice for the additional information required to continue the assessment for the Proposal along with the DCCEEW's additional information requirements for assessment of Proposal under the EPBC Act on 19 October 2023. KML had a few meetings with the EPA / the DCCEEW to clarify the additional information requirements and various specialist consultants have been engaged to address those information requirements for various environmental factors during the reporting period. A range of environmental studies and assessments for the Proposal have started during the reporting period with the flora and vegetation surveys scheduled in late August / early September 2024. Those studies and assessments to address the key environmental factors as required by the EPA / the DCCEEW will continue in the next reporting period and an Environmental Review Document will be prepared and submitted to the DWER-EPAS when all additional information required by the EPA / the DCCEEW becomes available.

5 COMPLIANCE WITH CONDITIONS

KML conducted an audit in August 2024 to satisfy Condition 4-3 of MS805, MS806 and MS968. The audit was conducted in accordance with the CAPs prepared under MS805, MS806, and MS968 respectively and evaluated compliance with all conditions for the period 1 July 2023 to 30 June 2024 (MS805 and MS806) and 4 June 2023 to 3 June 2024 (MS968).

The DWER-approved audit table for MS805 (Appendix B) comprise 54 audit elements. Of these:

- 38 elements were found to be Compliant;
- 6 elements were found to be Completed;
- 5 elements were found to be Not Required at this Stage;
- 0 elements were assessed as being a major Non-Compliance;
- 5 element was assessed as being a minor Non-Compliance (all related to Shield-backed Trapdoor Spider Monitoring);
- 0 elements were assessed as being Potentially Non-Compliant; and
- 0 elements were assessed as being In Process.

The DWER-approved audit table for MS806 (Appendix C) comprise 56 audit elements. Of these:

- 32 elements were found to be Compliant;
- 17 elements were found to be Completed;
- 5 elements were found to be Not Audited at this Stage;
- 0 elements were assessed as being a major Non-Compliance;
- 2 element was assessed as being a minor Non-Compliance;
- 0 elements were assessed as being Potentially Non-Compliant; and
- 0 elements were assessed as being In Process.

The DWER-approved audit table for MS968 (Appendix D) comprise 34 audit elements. Of those:

- 15 elements were found to be Compliant;
- 5 elements were found to be Completed;
- 14 elements were found to be Not Audited at this Stage;
- 0 elements were assessed as being a Non-Compliance; and
- 0 elements were assessed as being In Process.

The findings of the audit are summarised below. The statements of compliance for MS805, MS806 for the period 1 July 2023 to 30 June 2024 and MS968 for the period of 4 June 2023 to 3 June 2024 are detailed in Appendix B, Appendix C and Appendix D respectively.

5.1 Non-compliance

Five Non-Compliance (Minor) associated with the non-compliance reporting (MS805:4.5) and Shield-backed Trapdoor Spider monitoring (MS805:9.2, 9.3, 9.4 and 9.5) continued to be recorded in this annual audit for MS805. Two Non-Compliance (Minor) with respect to the non-compliance reporting (MS806:4.5) and rehabilitation of the MIOP area within five years following cessation of productive mining (MS806:11.1.1a) also continued to be recorded in this annual audit for MS806. Those non-compliances are summarised in Table 1.

Table 1: Non-compliance Summary

Condition	Level of Non-compliance	Description of Non-compliance	Corrective Action
<p>MS805:4.5</p> <p>The proponent shall advise the CEO of any non-compliance as soon as practicable.</p>	<p>Minor</p>	<p>DWER-EPAS advised on 13 June 2023 that the EPA’s inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and DWER-EPAS expects staging of progression on the s46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the KIOP MLE Proposal, which is currently being formally assessed by the EPA. DWER-EPAS provided no updates on the progress on the removal of Condition 9 of MS805: Spider monitoring during this reporting period.</p> <p>Despite the above, the discontinued monitoring of Shield-backed Trapdoor Spiders during the monitoring period was considered as non-compliance and</p>	<p>KML will continue to follow up with DWER-EPAS for the progression on the s46 inquiry to remove Condition 9 of spider monitoring during the following assessment of the Proposal.</p>

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Condition	Level of Non-compliance	Description of Non-compliance	Corrective Action
		DWER was not advised of this non-compliance. However, DWER has previously advised that KML can discontinue spider monitoring and KML are considered to meet the intention of the Conditions of Spider Monitoring.	
<p>Spider Monitoring</p> <p>MS805:9.2(1-2)</p> <p>The objective of the monitoring program required by condition 9-1 is to:</p> <p>demonstrate that the persistence of the population of <i>Idiosoma nigrum</i> in the Blue Hills area will not be impacted as a result of the proposal, improve knowledge of the ecology and impacts of the proposal on <i>Idiosoma nigrum</i>.</p> <p>MS805:9.3(1-3)</p> <p>The proponent shall monitor changes in the population in terms of:</p> <p>number and size of area(s) inhabited by spiders.</p>	Minor	DWER-EPAS advised on 13 June 2023 that the EPA’s inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and DWER-EPAS expects staging of progression on the s46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the KIOP MLE Proposal, which is currently being formally assessed by the EPA. DWER-EPAS provided no updates on the progress on the removal of Condition 9 of MS805: Spider	KML will continue to follow up with DWER-EPAS for the progression on the s46 inquiry to remove Condition 9 of spider monitoring during the following assessment of the Proposal.

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Condition	Level of Non-compliance	Description of Non-compliance	Corrective Action
<p>number, size and distribution of burrows in occupied areas number of burrows occupied by spiders MS805:9.4 The proponent shall submit the results of the monitoring program required by Condition 9.1 to the CEO annually, as required. MS805:9.5 In the event that condition 9.2(1) cannot be met, the proponent shall develop and implement management measures and contingency actions to the satisfaction of the CEO.</p>		<p>monitoring during this reporting period. Despite the above, the discontinued monitoring of Shield-backed Trapdoor Spiders during the monitoring period was considered as non-compliance and DWER was not advised of this non-compliance. However, DWER has previously advised that KML can discontinue spider monitoring and KML are considered to meet the intention of the Conditions of Spider Monitoring.</p>	
<p>MS806:4.5 The proponent shall advise the CEO of any non-compliance as soon as practicable.</p>	<p>Minor</p>	<p>One minor non-compliance associated with not meeting the 70% species composition target for MIOP (e.g. only at monitoring quadrat BHNWD01 due to abundance of one species) within five years of following the cessation of productive mining (Condition 11.1.1a) was identified during the 2024 compliance audit. Although</p>	<p>It is expected the ongoing non-compliance with MS806 Condition 11.1.1a will be resolved when the Proposal is approved and those MIOP areas will be used for the KIOP mine life operations. While continuous monitoring of the rehabilitation sites at MIOP will be undertaken in accordance with Condition 11.1.1, KML will continue</p>

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Condition	Level of Non-compliance	Description of Non-compliance	Corrective Action
		<p>DWER is aware this is an ongoing non-compliance as the un-rehabilitated MIOP area is being utilised to support KIOP operations, the individual monitoring quadrat BHNWD01 not meeting the 70% species composition target for MIOP should have been reported to DWER as soon as practicable.</p>	<p>to work closely with the DWER-EPAS during the following assessment of the Proposal and expect to resolve this ongoing non-compliance when the Proposal is approved.</p>
<p>MS806:11.1.1</p> <p>As mining progresses, the proponent shall commence progressive rehabilitation of the mine site area in accordance with the following:</p> <p>re-establishment of vegetation in the rehabilitation area to be comparable with that of the pre-mining vegetation such that the following criteria are met within five years following the cessation of productive mining:</p> <p>(a) flora and vegetation are re-established with not less than 70 percent species composition (not including weed species); and</p>	<p>Minor</p>	<p>Not all areas of MIOP have been rehabilitated within five years of mining cessation.</p> <p>Although average of 70% species composition was achieved for MIOP as a whole for the area, however 70% for one monitoring quadrat BHNWD01 was not achieved.</p>	<p>It is expected the ongoing non-compliance with MS806 Condition 11.1.1a will be resolved when the Proposal is approved and those MIOP areas will be used for the KIOP mine life operations.</p> <p>While continuous monitoring of the rehabilitation sites at MIOP will be undertaken in accordance with Condition 11.1.1, KML will continue to work closely with the DWER-EPAS during the following assessment of the Proposal and expect to resolve</p>

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Condition	Level of Non-compliance	Description of Non-compliance	Corrective Action
(b) weed coverage consistent with recorded baseline levels or 10 percent, whichever is less			this ongoing non-compliance when the Proposal is approved.

Spider Monitoring at KIOP

MS805 Conditions 9.2(1), 9.3(1-3), 9.4 and 9.5 require monitoring and reporting of the population of Shield-backed Trapdoor Spider (*Idiosoma nigrum*) in the Blue Hills area to demonstrate that the persistence of the population of *Idiosoma nigrum* is not impacted by the Project. Following taxonomic review by the Western Australian Museum, it has been identified that the species of *Idiosoma* associated with the Project is not *Idiosoma nigrum* (Endangered), but the common *Idiosoma clypeatum* 'MYG018' (P3). KML submitted a letter of request to DWER in July 2018 seeking variation of MS805 through removal of Condition 9: Spider monitoring. Response received from DWER-EPAS via EP Act s46 form on 13 February 2019 indicated that the Minister requested that the EPA inquire into and report on the removal of Condition 9, as well as the application of offsets to the proposal and whether they should be included as a condition. KML submitted additional offsets related information as requested by the DWER-EPAS for EPA's inquiry into changing the implementation conditions relating to KIOP MS805 pursuant to section 46(1) of the EP Act on 18 May 2022.

The proposed removal of Condition 9 (and its associated sub-condition 9.1 – 9.5) in relation to the spider monitoring program was also included in the referral application for the Proposal submitted to the DWER-EPAS under s38 of the EP Act on 21 February 2022 and a revised referral application was submitted to the DWER-EPAS under s38C of the EP Act on 30 September 2022. DWER-EPAS accepted the revised referral and decided to assess the Proposal at a level of 'Assess - Referral Information with additional information required under s40(2)(a) and public review s40(5)' pursuant to s38G(1) of the EP Act on 21 June 2023. DWER-EPAS advised on 13 June 2023 that the EPA's inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and is likely to be considered along with the assessment of the Proposal under Part IV of the EP Act and decision on the conditions of the new Ministerial Statement for the Proposal. No further updates on this matter were received from the DWER-EPAS while the Proposal remained in assessment by the DWER-EPAS during the reporting period.

The most recent Shield-backed Trapdoor Spider Monitoring occurred in 2019, with no monitoring occurring in 2020, 2021, 2022 and 2023. The spider monitoring has been discontinued following re-classification of the species. DWER advised in a meeting in September 2021 that KML can discontinue spider monitoring and KML are considered to meet the intention of the MS805 Conditions 9.2(1-2), 9.3(1-3), 9.4 and 9.5 associated with spider monitoring.

KML will continue to follow up with DWER-EPAS for the progression on the s46 inquiry to remove Condition 9 of spider monitoring during the following assessment of the Proposal.

Rehabilitation at MIOP

MS806 Condition 11.1.1a requires that flora and vegetation are re-established with not less than 70% species composition within five years following cessation of productive mining. Mining at MIOP was completed in March 2014 and consequently KML was required to satisfy this condition by March 2019. The audit found that, whilst KML has rehabilitated substantial parts of MIOP to the 70% criterion (12 out of 13 rehabilitation sites), parts of MIOP (estimated at 3.7% of the MIOP project footprint) have not yet been rehabilitated. The un-rehabilitated areas include areas used to support ongoing operations at KIOP, including pits for water storage and supply, pipeline, access tracks, transmission line, a laydown yard and an emergency response training area. Those areas are expected to be required until the completion of mining at KIOP in approximately 30 years.

DWER-EPAS identified this was an ongoing non-compliance following their compliance audit on MS806 in 2021. KML intended to include the above MIOP areas that are currently used to support mining at KIOP in the referral application for the Proposal in February 2022 to resolve this ongoing non-compliance.

Based on the discussion with the DWER-EPAS in August 2022, a revised referral for the Proposal, which incorporates the entire footprint previously approved under MIOP (MS806) (except those areas within the tenements that are no longer held by KML) was submitted to the DWER-EPAS under s38C of the EP Act on 30 September 2022. DWER-EPAS accepted the revised referral and decided to assess the Proposal at a level of 'Assess - Referral Information with additional information required under s40(2)(a) and public review s40(5)' pursuant to s38G(1) of the EP Act on 21 June 2023. It is expected this will resolve the ongoing non-compliance with MS806 Condition 11.1.1a when the Proposal is approved and those MIOP areas will be used for the KIOP mine life operations.

While continuous monitoring of the rehabilitation sites at MIOP will be undertaken in accordance with Condition 11.1.1, KML will continue to work closely with the DWER-EPAS for the following assessment of the Proposal and expect to resolve this ongoing non-compliance when the Proposal is approved.

6 ENVIRONMENTAL MONITORING AND MANAGEMENT

This section provides details of monitoring conducted by KML as per the conditions in MS805, MS806 and MS968.

6.1 Dust Management

In accordance with condition 6.5 of MS805 and MS806, the KML Environmental Plan – Dust Management CORP-EN-PLN-1010 and the KML Environmental Procedure – Dust Monitoring CORP-EN-PRO-1005, KML monitors the impact of mining related activities on ambient dust levels and the potential effects from dust on vegetation health.

The following internal KML dust trigger limits are outlined in the KML Environmental Procedure – Dust Monitoring CORP-EN-PRO-1005:

- Trigger limit of 8 g/m²/month around operational mining areas; and
- Threshold limit of 10 g/m²/month around operational mining areas.

Dust deposition is monitored at KIOP, MIOP and HIOP via 24 dust deposition gauges. Thirteen of these gauges have been installed around the operational mining area at KIOP and seven have been installed around post operational areas at HIOP and MIOP to monitor for dust generated as a result of mining activities and its impacts on ecological receptors. Three gauges have been installed outside of active mining areas to monitor for background dust levels (Gauges 5, 6, and 16) and a single gauge has been placed at the Karara Homestead (Gauge 1). Dust deposition gauges are collected monthly and sent to a National Association of Testing Authorities (NATA) accredited laboratory for analysis. Monthly dust deposition results are assessed against the internal KML dust limits listed above.

This section details findings in relation to dust management and monitoring over the reporting period.

6.1.1 HIOP and MIOP Dust Results

Since cessation of crushing and screening activities at HIOP and MIOP, dust levels have reflected background levels recorded at control sites. Over the reporting period, average dust deposition levels ranged between 0.5 to 24.1 g/m²/month (12-month average of 3.3 g/m²/month) at HIOP (Figure 5), noting this significantly elevated value of 24.1 g/m²/month was associated with an exceedance recorded at HIOP (dust bottle ID 20) in October 2023, which was attributed to a natural anomaly (either local dust storm or bird pooping in the bottle's funnel) as this bottle is located more than 20km away from any active mining activity or hauling road. At MIOP (Figure 6), average dust deposition levels ranged from 0.7 to 4.1 g/m²/month (12-month average of 1.87 g/m²/month).

Excluding the exceedance recorded in October 2023 at HIOP due to a natural anomaly, the 12-monthly average dust deposition level recorded at HIOP during the reporting period recorded a slight decrease compared to last year's monitoring result from 1.43 g/m²/month to 1.40 g/m²/month. The 12-month average dust deposition level showed a significant decrease at MIOP compared to the last year's monitoring result from 3.72 g/m²/month to 1.87 g/m²/month as no exceedances were recorded at MIOP over the reporting period.

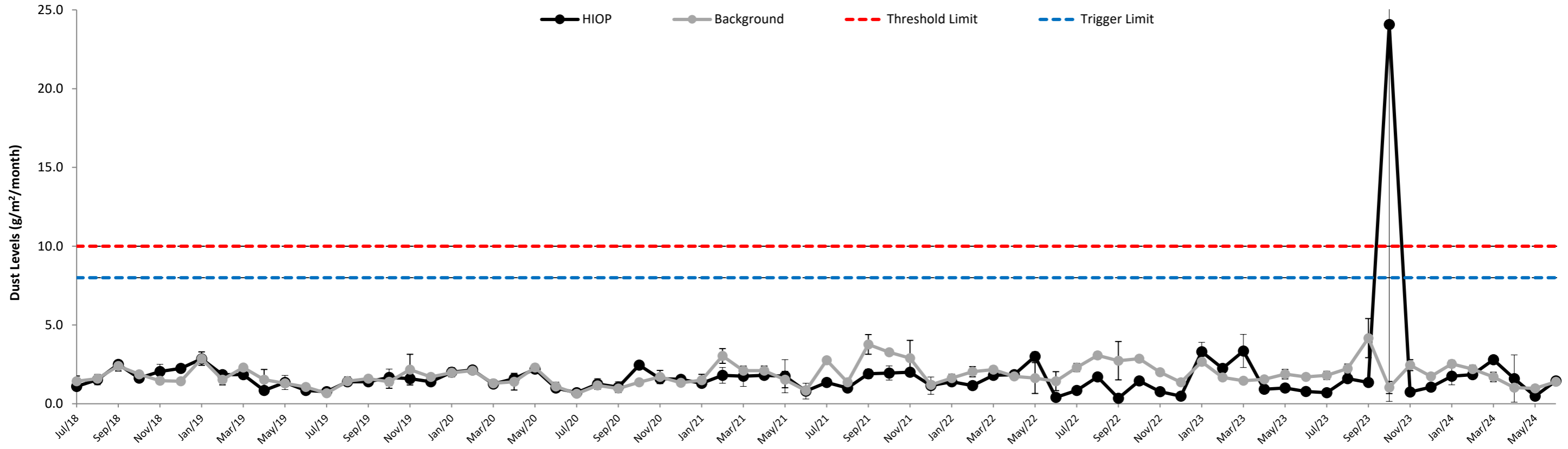


Figure 5: HIOP Monthly Dust Deposition Levels

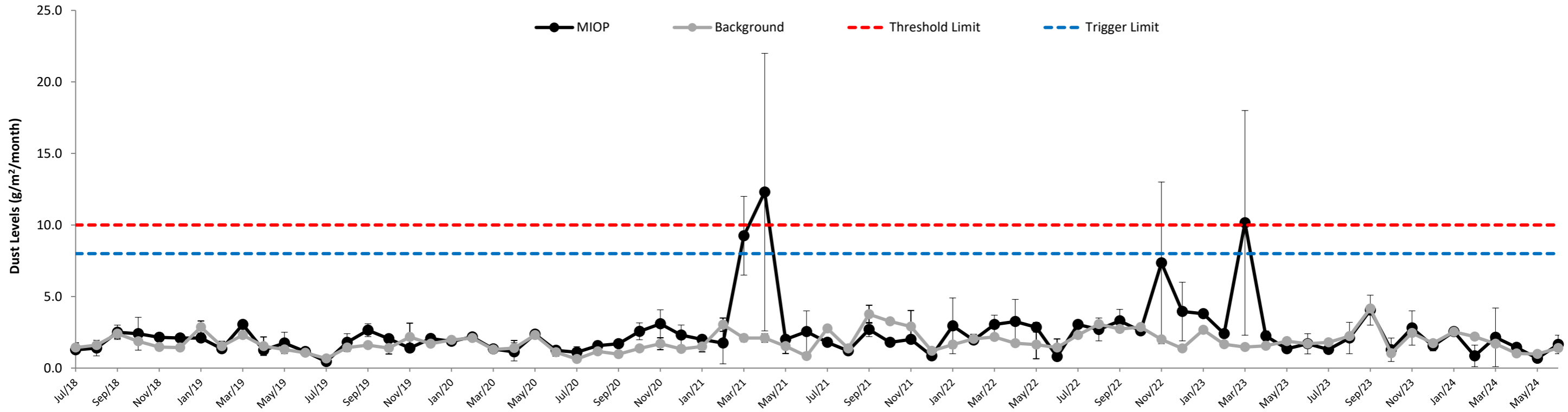


Figure 6: MIOP Monthly Dust Deposition Levels

6.1.2 KIOP Dust Results

During the reporting period, average dust deposition levels of the cumulative dust gauges at KIOP ranged from 1.2 to 6.9 g/m²/month (12-month average of 2.81 g/m²/month compared to 2.76 g/m²/month recorded during last reporting period), whilst average background levels ranged from 1.0 to 4.2 g/m²/month (12-month average of 1.94 g/m²/month) (Figure 7). The average dust deposition levels have remained steady around 3.00 g/m²/month since last reporting period.

During the reporting period, average dust deposition levels at the nearest sensitive receptor (Karara Homestead, approximately 7km south of KIOP) ranged from 0.3 to 2.2 g/m²/month, with a 12-month average of 1.28 g/m²/month (Figure 8), which shows a decrease from 2.01 g/m²/month recorded in the last reporting period.

During the reporting period there were five occurrences where threshold limit (10 g/m²/month) was exceeded, as these exceedances were not consecutive, there was no requirement for regulator notification. The exceedances were related to the increasing mining activities adjacent to Karara pit area (Stage 5), strong winds and reduced stockpile moisture/watering at the rail loop (TLO); and non-mining related events (e.g. local dust storm or bird's pooping) at HIOP and Karara Homestead. These exceedances were reported and investigated internally as per KML's Dust Monitoring Procedure (CORP-EN-PRO-1005), and the mining contractor was notified to take additional dust management actions.

These monitoring results show that KML's dust management measures are effective at managing dust emissions to the surrounding environment during the reporting period.

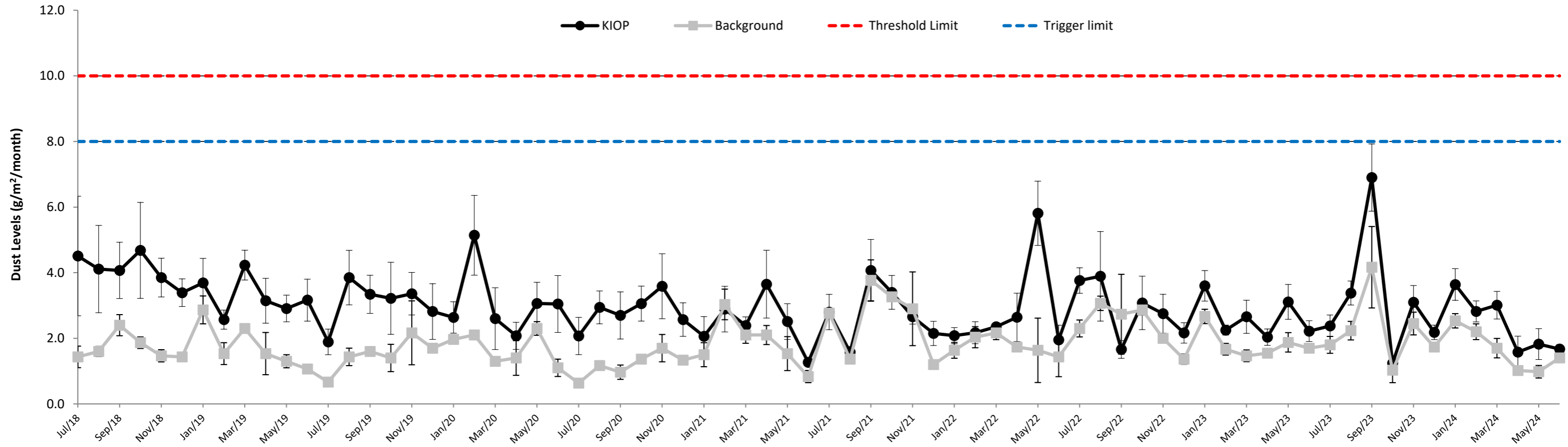


Figure 7: KIOP Monthly Dust Deposition Levels

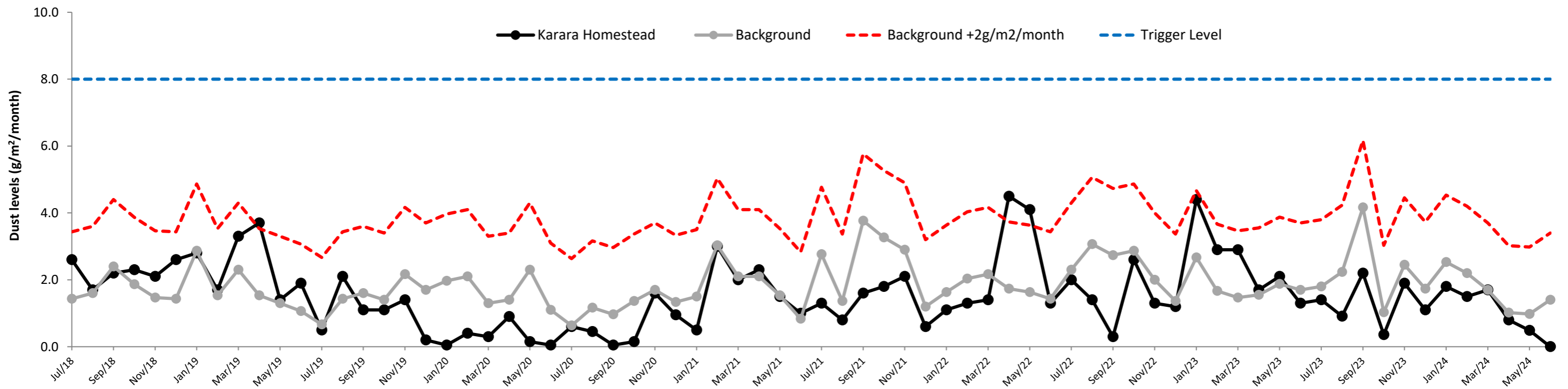


Figure 8: Karara Homestead Monthly Dust Deposition Levels

6.2 Fauna Management

During the reporting period, KML undertook management of fauna, in accordance with the following environmental plans and procedures:

- CORP-EN-PRO-1024 – Western Spiny-tailed Skink, Management, Monitoring and Translocation
- CORP-EN-PRO-1035 – Malleefowl Management and Monitoring
- CORP-EN-PRO-1050 – Feral Animal Management and Monitoring
- CORP-EN-PLN-1008 – Fauna Management
- CORP-EN-PRO-1010 – Terrestrial Fauna Management

This section details findings in relation to performance against fauna management.

6.2.1 Western Spiny-tailed Skink Management and Monitoring

KML mapped prospective Western Spiny-tailed Skink (WStS) habitat in 2008 and has been conducting monitoring since 2011 to determine whether mining is impacting on the local population.

WStS monitoring is undertaken in accordance with the Department of Sustainability, Environment, Water, Populations and Communities (now Department of Climate Change, Energy, the Environment and Water [DCCEEW]) survey guidelines for Australia's threatened reptiles (Commonwealth of Australia, 2011) and the Environmental Procedure – Western Spiny-tailed Skink Management, Monitoring and Translocation CORP-EN-PRO-1024.

To investigate potential impacts of mining, monitoring sites within monitoring areas are divided into two categories:

- **Impact Sites:** within 500m from mining disturbance
- **Control Sites:** outside 500m from mining disturbance

Monitoring is undertaken during the breeding season between spring and summer by trained personnel from the KML Environmental Department. Monitoring involves thoroughly searching for skinks and/or scats in sheltering sites such as hollow logs/trees and roots, piles of timber and rocky outcrops within prospective skink habitats. Monitoring includes details on evidence of WStS, such as the age, contents and size of scats and latrines and photographs of monitoring sites and scats so as to adequately determine recent activity or presence of WStS. WStS are classified as present using direct observation, camera trap evidence or presence of

scat. Scat evidence is further broken down into fresh or old scats, with the presence of fresh scats a better indicator of skink activity.

Annual WStS monitoring in the reporting period was undertaken in October and November 2023. Monitoring of 160 sites was undertaken, including 73 control sites, 76 impact sites, and 11 translocation sites. Monitoring identified that 49 sites were inhabited (28 at control sites and 21 at impact sites) and 111 sites were uninhabited (45 at control sites, 55 at impact sites and 11 at translocation sites) (Figure 9). The results indicate a slight decrease in inhabited logs at both control and impact sites, from 25 to 21 logs (approximately 16%) at the impact sites and from 32 to 28 logs (approximately 12%) at the control sites compared with last year's results (Figure 10). The reduced number of inhabited logs could be potentially associated with a significant decrease rainfall recorded during the reporting period as annual rainfall recorded in 2023 at Karara Mine Site was 232.6mm being the second lowest recorded annual rainfall since the driest reporting period in 2019 (166.25mm). Low rainfall rates may have potentially impacted the skink population by decreasing food availability and the microhabitat suitability due to reduced overhanging vegetation on the log piles they tend to occupy. Numbers of old scats are still greater than the new/fresh scats recorded in 2023 monitoring (Figure 11).

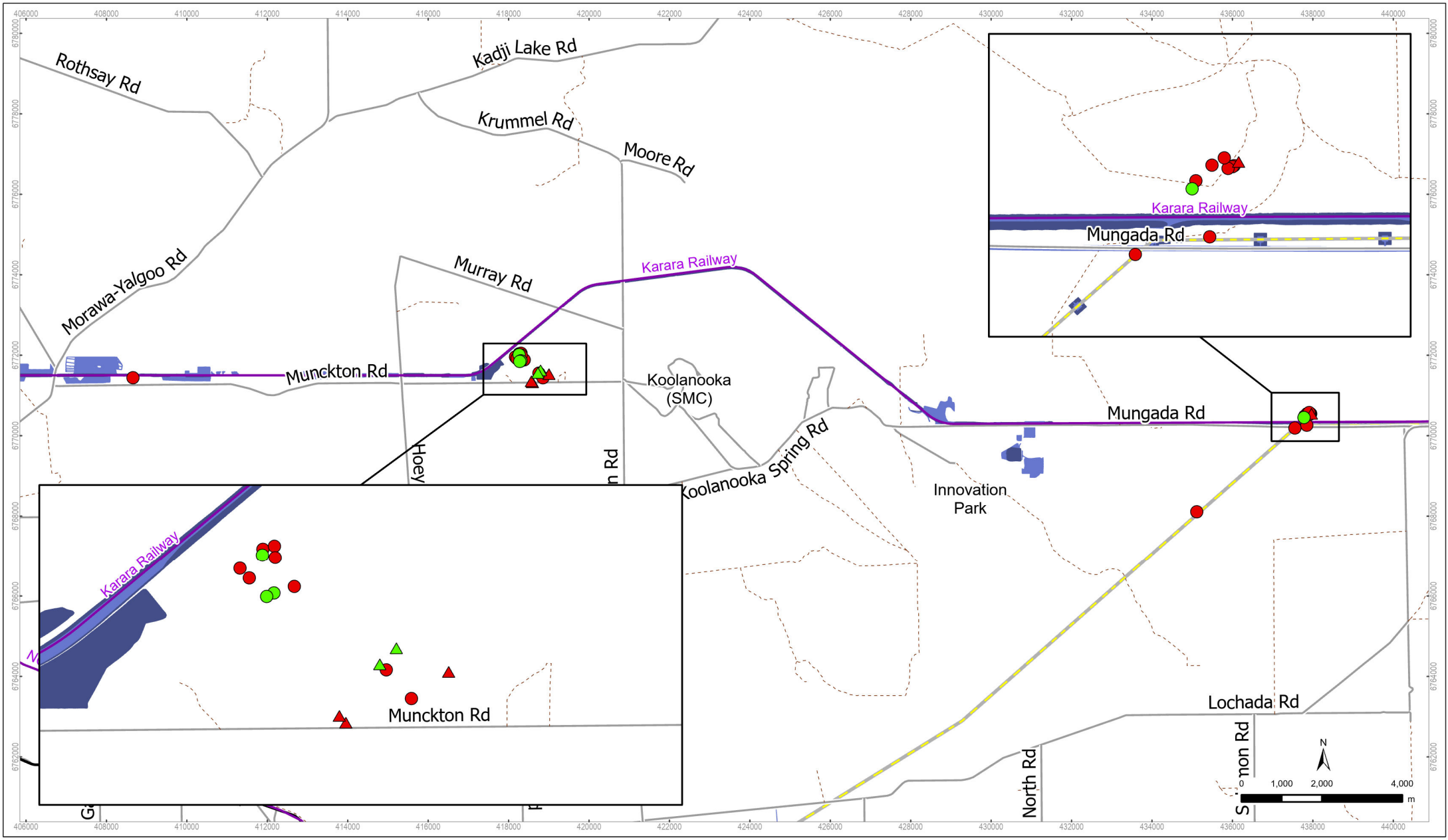
Ongoing WStS monitoring has shown that decline or recovery in skink population is potentially driven by seasonal factors. Further monitoring will be undertaken to determine whether there is a correlation between seasonal factors and WStS populations or if it is more associated with a long-term trend.

KML's objective of monitoring for the presence or absence of WStS on an annual basis has been achieved in each successive year since the commencement of monitoring in the spring of 2011. Monitoring results to date strongly suggest that mining related activities are not impacting WStS populations. Whilst presence/absence data varies between years, skink activity at impact and control sites are closely aligned, with an average presence of skinks at control sites comparable at impact sites (both around 50%). Similarly, at sites where skink presence is observed, the indicators of recent activity (fresh scats) were basically consistent between impact and control sites (Figure 11).

A translocation program for WStS colonies within KML disturbance areas has been in place since the commencement of the project in 2010. A total of ten WStS and 21 potential WStS colonies (habitat log piles) have been translocated since the start of the project. All translocation sites have been monitored on an annual basis, no evidence of WStS (presence of fresh scats) was observed at any translocation site during the reporting period.

No mortalities of WStS were recorded during the reporting period.

Figure 9: WStS Monitoring Locations



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(2024)
Western Spiny-tailed Skink
Monitoring 2023/2024



- WSTS Monitoring
Status, SiteType
- ▲ Inhabited, Control
 - Inhabited, Impact
 - ▲ Uninhabited, Control
 - Uninhabited, Impact

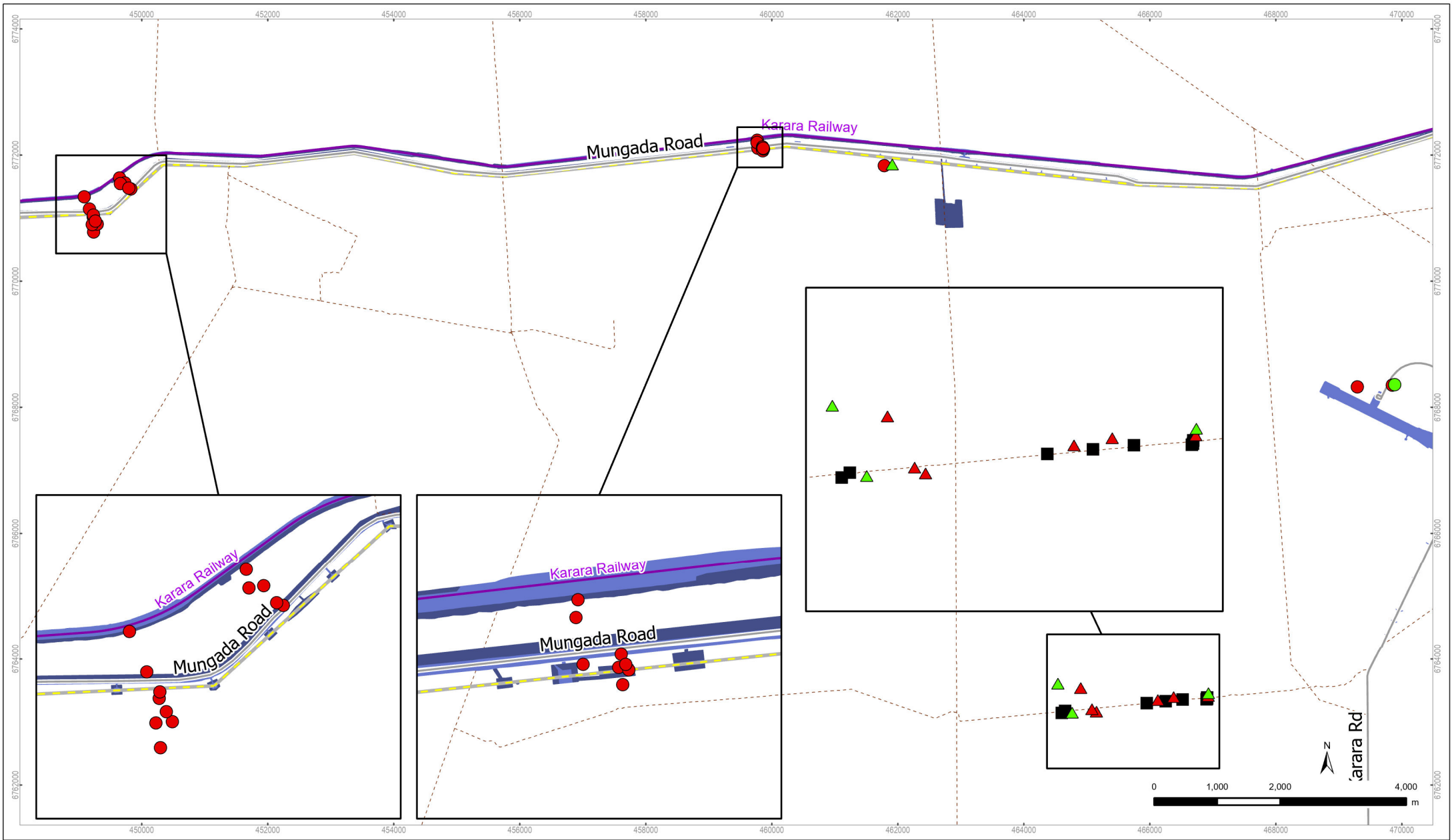
- Uninhabited, Translocation
- KML Open Ground Disturbance
- KML Rehabilitation
- Railway (Freight)
- Karara Power Transmission

- Roads Regional
- Main
 - Minor
 - Highway
 - Track



Ref: K0170 F6
Version: A
1 August 2024

Proj: GDA94 MGAZ50
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MS Annual Compliance Report
(2024)

Western Spiny-tailed Skink
Monitoring 2023/2024

KARARA
MINING LTD

WSTS Monitoring

Status, SiteType

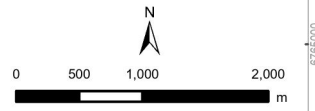
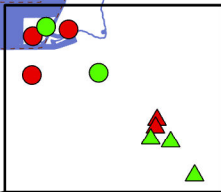
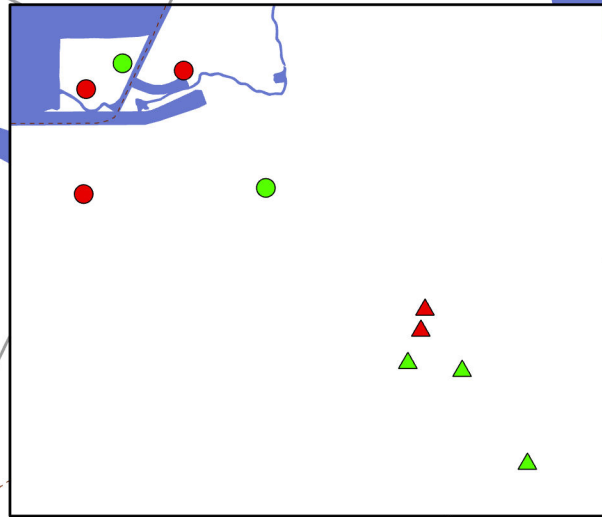
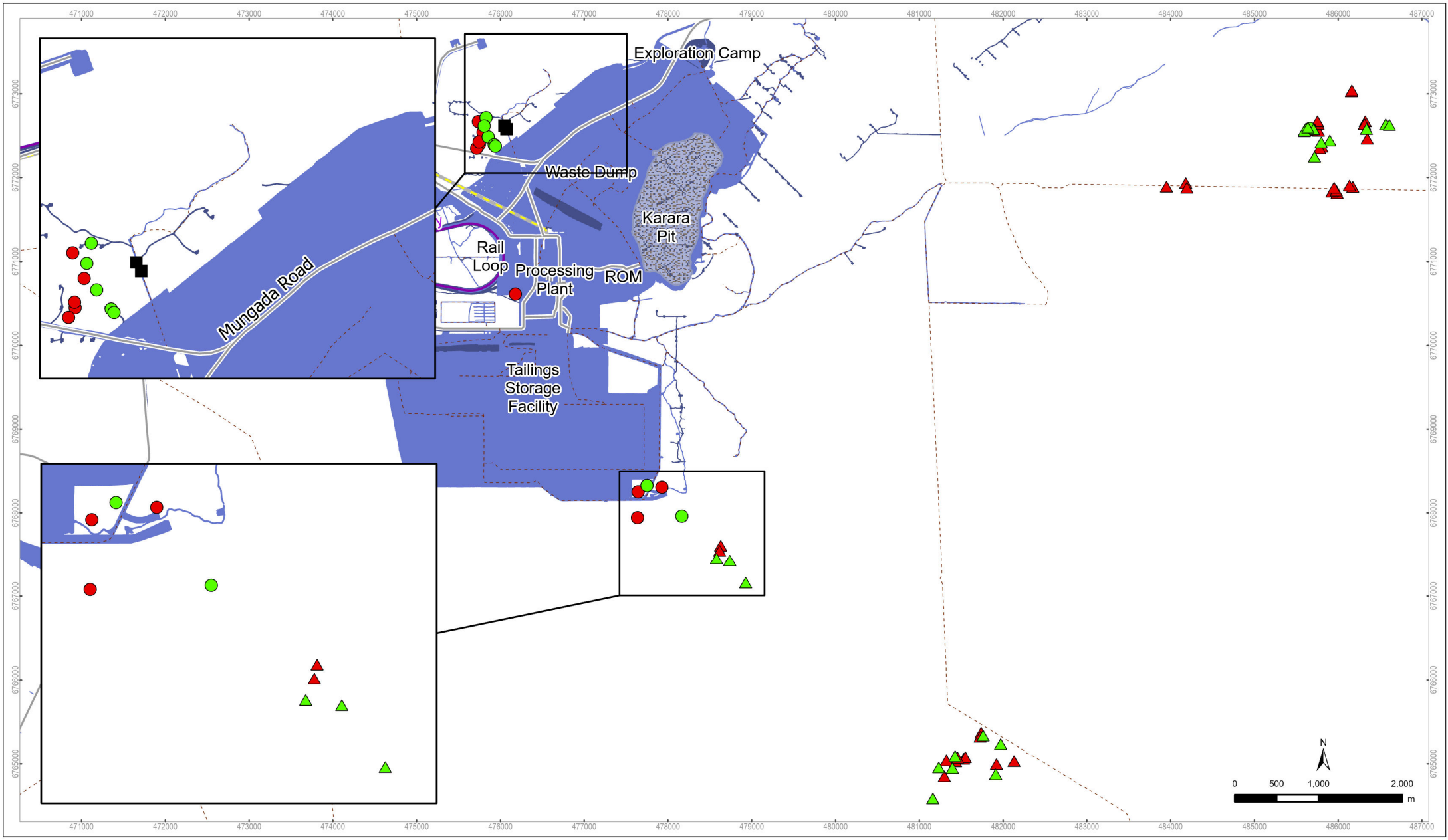
- ▲ Inhabited, Control
- Inhabited, Impact
- ▲ Uninhabited, Control
- Uninhabited, Impact

- Uninhabited, Translocation
- KML Open Ground Disturbance
- KML Rehabilitation
- Railway (Freight)
- Karara Power Transmission

- Roads Regional
- Main
 - Minor
 - Highway
 - Track



Ref: K0170 F7 Proj: GDA94 MGAZ50
Version: A Scale: 1:80,000
1 August 2024 Size: A4



MS Annual Compliance Report (2024)

Western Spiny-tailed Skink Monitoring 2023/2024



WSTS Monitoring

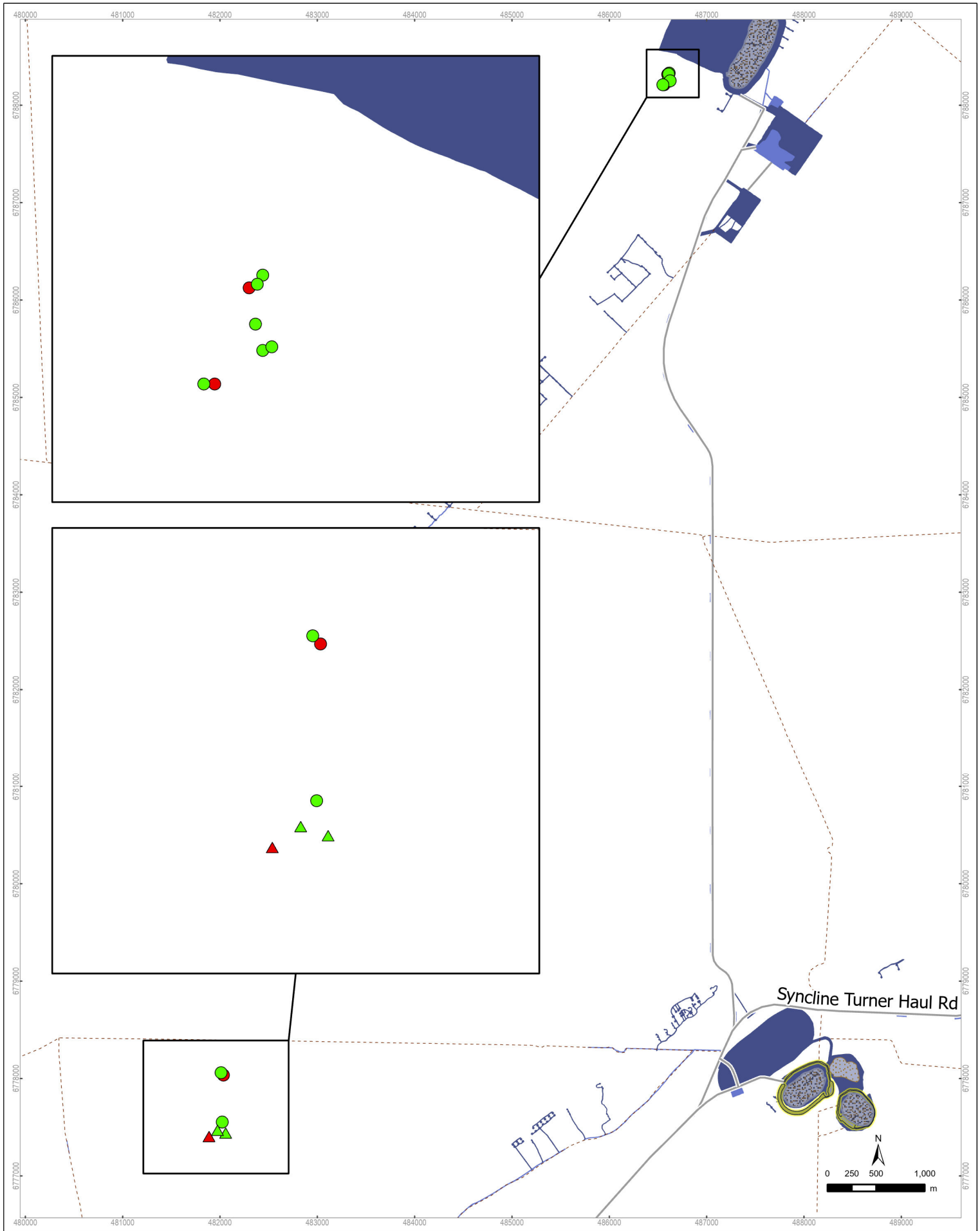
Status, SiteType

- ▲ Inhabited, Control
- Inhabited, Impact
- ▲ Uninhabited, Control
- Uninhabited, Impact

- Uninhabited, Translocation
- KML Open Ground Disturbance
- KML Rehabilitation
- Railway (Freight)
- Karara Power Transmission

- Roads Regional**
- Main
 - Minor
 - Highway
 - Track





MS Annual Compliance Report (2024)

Western Spiny-tailed Skink Monitoring 2023/2024



WSTS Monitoring

Status, SiteType

- ▲ Inhabited, Control
- Inhabited, Impact
- ▲ Uninhabited, Control
- Uninhabited, Impact

- Uninhabited, Translocation
- KML Open Ground Disturbance
- KML Rehabilitation
- Railway (Freight)
- Karara Power Transmission
- Roads Regional
- Main
- Minor
- Highway
- - - Track



Ref: K0170 F9
Version: A
1 August 2024

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Scale: 1:50,000
Size: A4

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ANNUAL COMPLIANCE ASSESSMENT REPORT 2024

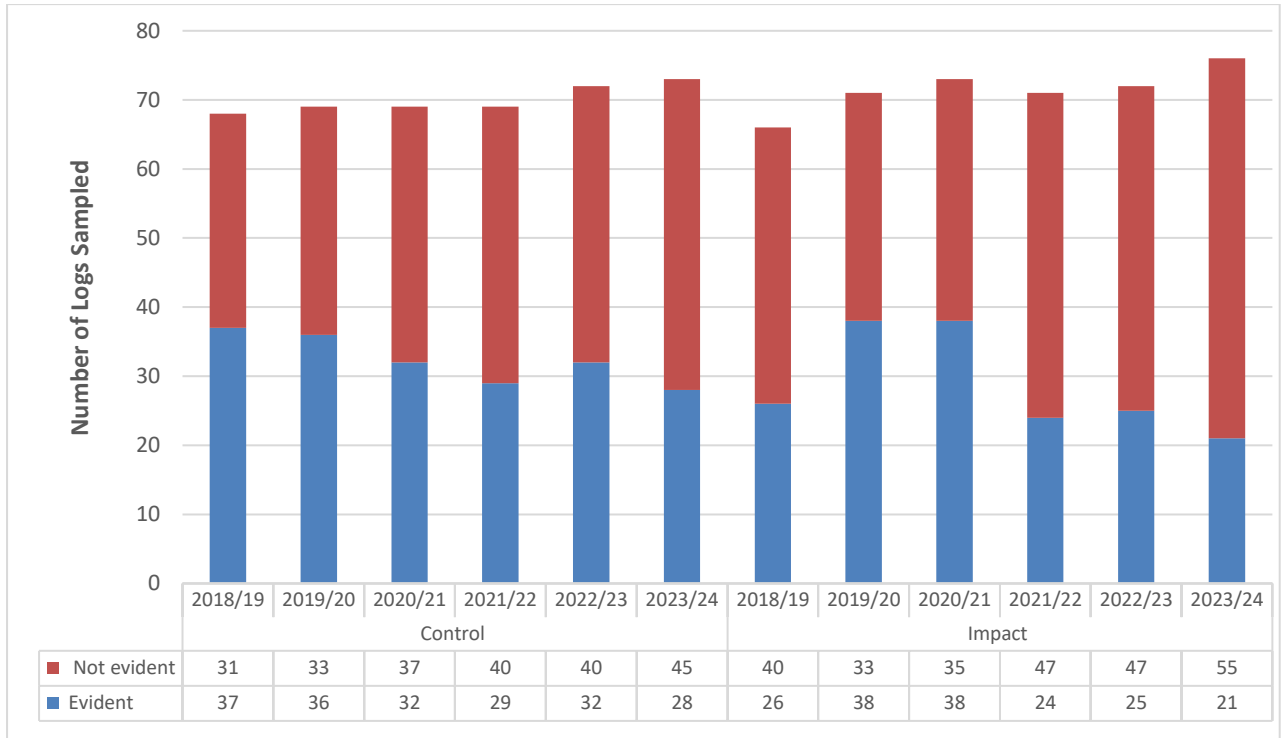


Figure 10: WStS evidence recorded at control and impact sites across all KML tenements

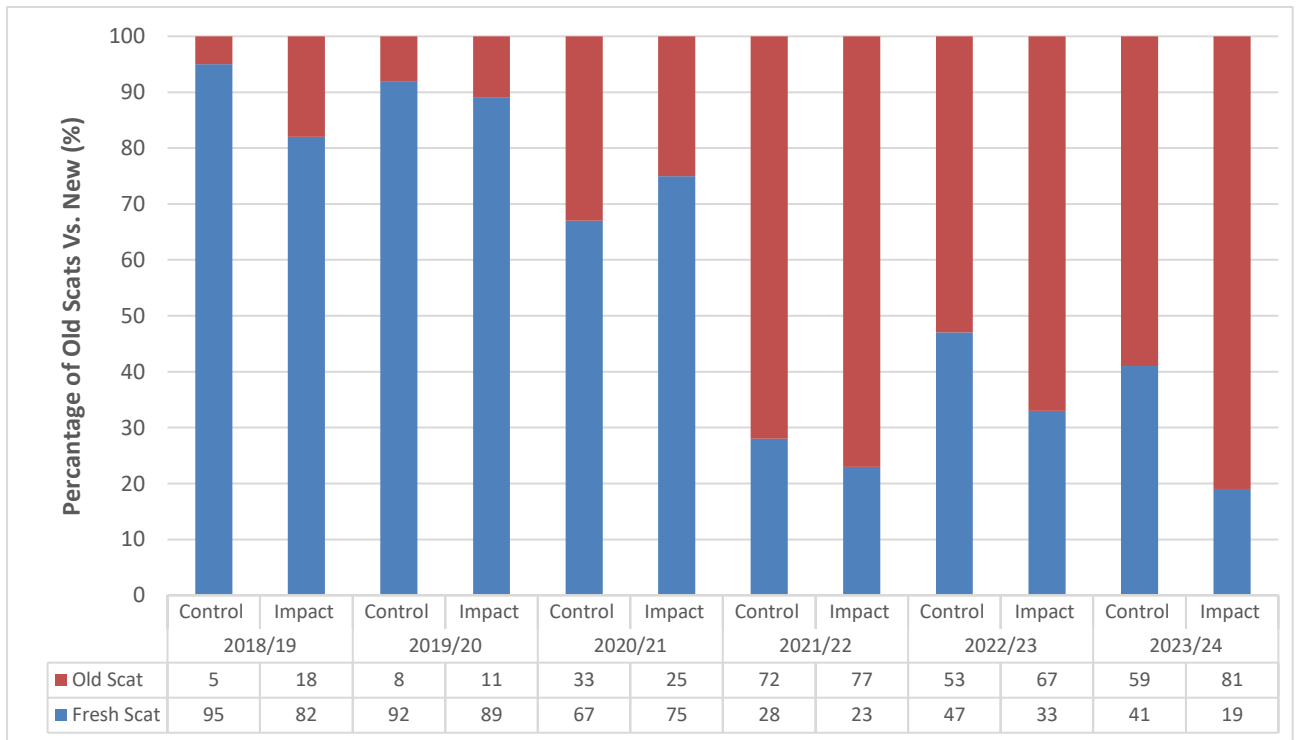


Figure 11: WStS scat evidence recorded (%) at control and impact sites across all KML tenements

6.2.2 Malleefowl Management and Monitoring

KML have monitored Malleefowl annually since 2008 in accordance with the Environmental Procedure - Malleefowl Monitoring and Management CORP-EN-PRO-1035. In addition, opportunistic observational records of Malleefowl and mounds are recorded by KML employees and contractors on the KML Environmental Form – Fauna Sighting, Relocation and Mortality CORP-EN-FRM-1045.

Monitoring is undertaken by the KML Environment team throughout the Malleefowl breeding season, from 1st September until 30th April so that accurate information can be gathered on populations and mound activity. KML uses the National Malleefowl Monitoring Manual (National Malleefowl Recovery Team, 2016) to define and determine which mounds shall be monitored within any given year. Mounds that were active the previous year and those in close proximity to infrastructure are monitored as a priority, followed by mounds with less recent activity. Selections of mounds with an unverified status in close proximity to activity or infrastructure are included in the monitoring schedule.

A total of 65 mounds were surveyed over the reporting period, of which 8 were reported as active (Figure 12). The number of active mounds has decreased by approximately 58% compared to last reporting period with 19 active mounds being recorded (Table 2).

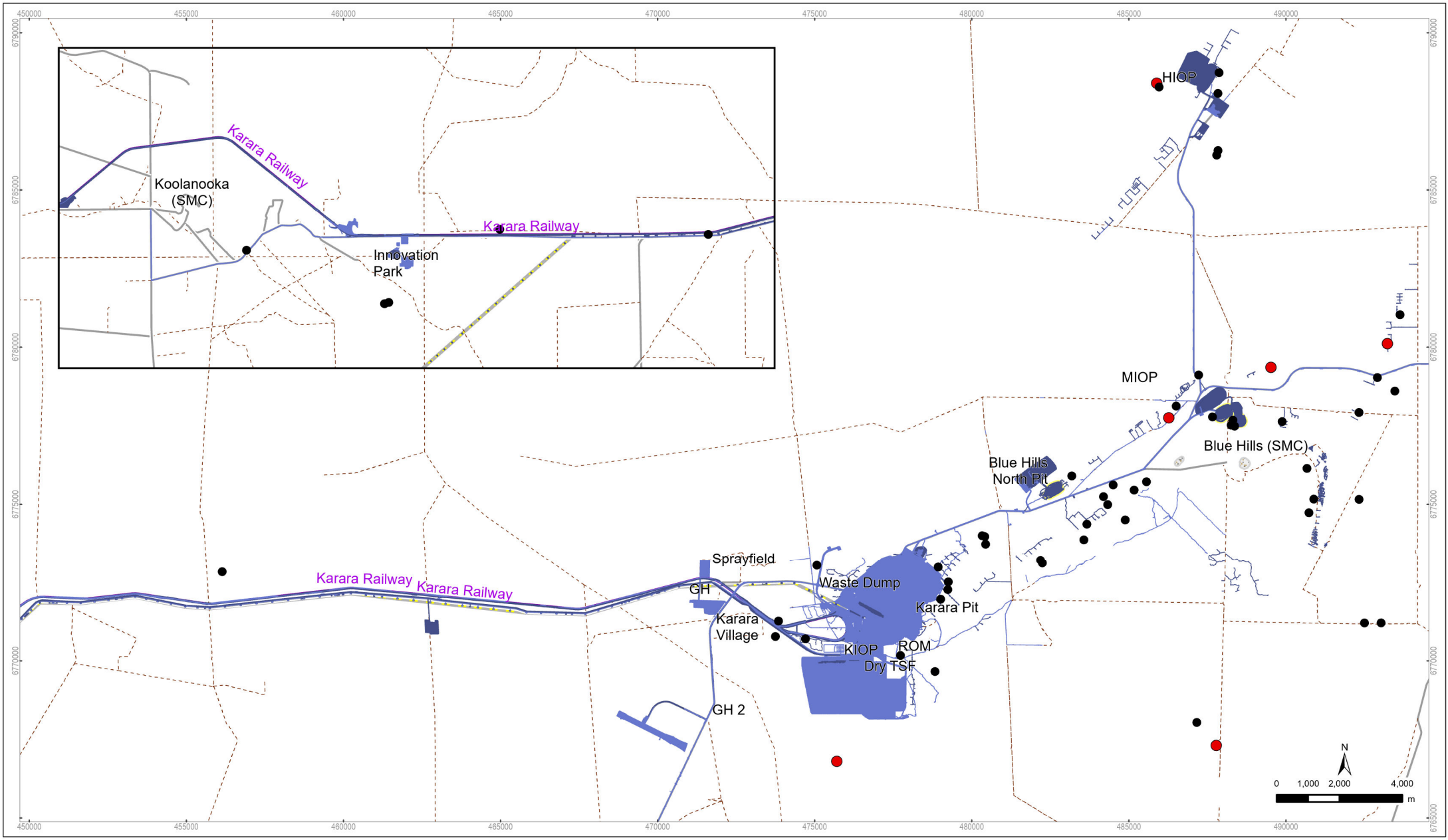
There were 19 Malleefowl sightings (24 individuals) during the reporting period (Table 2). Overall, the location and number of sightings recorded during the reporting period has remained relatively consistent in recent reporting periods, indicating that populations are not being impacted by mining activities. No new mounds were found on KML tenements during the 2023/24 reporting period. One Malleefowl mortality on KML tenements were recorded during the 2023/24 reporting period.

A total of 914 mounds of varying status (ancient through to fresh and actively used) have been identified and surveyed since 2008. The percentage of all mounds that are active has ranged from 2% (in 2012) to 27% (in 2022) and an average activity of 10% has been recorded over the past 15 years. The total number of mounds monitored in any one year has varied since the commencement of monitoring (ranging from 63 to 298), however the total number of active mounds identified each year has remained relatively consistent with some fluctuations associated with seasonal patterns. Overall, active mounds have ranged from 7 to 19 over the past 7 years with an average of 10 active mounds identified per year in last 15 years.

A spatial analysis of monitoring data shows that Malleefowl have occupied various mounds within operational areas where impacts to Malleefowl activity may be anticipated, with many

sites being used for multiple years over the reporting period. This would suggest that Malleefowl are relatively undisturbed by proximity to mining activity.

Figure 12: Malleefowl Mound Monitoring



MS Annual Compliance Report (2024)
Malleefowl Mound Monitoring 2023/24



- | | | |
|---------------------------------|---------------------------|---------|
| Monitored Mounds 2023/24 | KML Rehabilitation | Minor |
| Mound Status | Railway (Freight) | Highway |
| Active | Karara Power Transmission | Track |
| Inactive | Roads Regional | |
| KML Open Ground Disturbance | Main | |



Ref: K0170 F5 Proj: GDA94 MGAZ50
 Version: A Scale: 1:160,000
 1 August 2024 Size: A4

Table 2: Malleefowl Monitoring Results 2018-2024

Year	Mounds Surveyed	Category		% Active mounds	No. Sighted
		Active	Inactive		
2018/2019	89	10	79	11.2	21
2019/2020	84	10	74	11.9	24
2020/2021	157	10	147	6.4	19
2021/2022	88	15	73	17.0	7
2022/2023	71	19	52	27.0	18
2023/2024	65	8	57	12.3	19

6.2.3 Shield Backed Trapdoor Spider Monitoring

The Shield Backed Trapdoor Spider monitoring discontinued in 2020 and 2021 following the re-classification of the species as the Northern Shield-backed Trapdoor Spider (*Idiosoma clypeatum*), which is listed as non-threatened 'Priority 3' under the *Biodiversity Conservation Act*, 2016. KML submitted a letter of request to DWER in July 2018 seeking variation to MS805 through removal of Condition 9: Spider Monitoring. In January 2019 the Minister for Environment requested the EPA's inquiry into and report on the removal of Condition 9 as well as the application of offsets and KML provided additional offsets related information as per the EPA's request for further information for the inquiry in May 2022. Recent communication with DWER-EPAS on this matter on 13 June 2023 indicated that the EPA's inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and is likely to be considered along with the assessment of the Proposal under Part IV of the EP Act and decision on the conditions of the new Ministerial Statement for the Proposal.

6.2.4 Feral Animal Monitoring

In accordance with KML Environmental Procedure – Feral Animal Management and Monitoring CORP-EN-PRO-1050, KML monitor feral animal sightings and trapping success to ensure feral animal numbers are not increasing nor having a detrimental impact on conservation significant flora and fauna and other native fauna and flora resident on KML tenements.

Monitoring of feral animals is conducted via regular inspections of landfill facilities and rehabilitated areas, as well as via a fixed camera located in an area of Blue Hills Priority

Ecological Community (PEC) that is adjacent to the BHN pit. Opportunistic feral sightings are also recorded by staff around the Project area. Sightings of feral animals has varied slightly over the past three reporting periods, the number of cats sighted has remained stable compared to last reporting period. No goat or fox was sighted during this reporting period and last two reporting periods, possibly due to seasonal factors while the number of wild dogs/dingos sighted has increased by 4 since last reporting period (refer to Table 3).

Table 3: Feral animals sighted between 2018-2024

Reporting Year	Cats	Dogs/Dingos	Foxes	Goats
2018/2019	29	1	5	23
2019/2020	17	0	14	32
2020/2021	22	4	0	5
2021/2022	5	3	0	0
2022/2023	31	1	0	0
2023/2024	32	5	0	0

A comparison of trapping success from the past six reporting periods indicates the number of trapped feral animals has remained relatively consistent with some fluctuations in 2019/20, 2021/22 and 2022/23 reporting years. Feral cats trapped in 2023/24 have significantly increased compared to last year's reporting period, indicating consistency with the trapping success recorded since 2017. No foxes have been trapped since 2017 (refer to Table 4).

Table 4: Feral Animals trapped between 2017-2024

Reporting Year	Cats	Foxes	Goats
2017/2018	9	0	3
2018/2019	11	0	1
2019/2020	5	0	0
2020/2021	10	0	1

Reporting Year	Cats	Foxes	Goats
2021/2022	21	0	0
2022/2023	9	0	0
2023/2024	17	0	0

6.3 Fauna Mortalities

In accordance with condition 10.2 of MS805, condition 9.2 of MS806, and the KML Environmental Procedure – Terrestrial Fauna Management CORP-EN-PRO-1010, KML maintains a register of fauna mortalities related to mining activities. The KML Environmental Plan – Fauna Management CORP-EN-PRO-1008 also requires all personnel on site to report all fauna vehicle strikes or deaths from activities to the KML Environment Department for inclusion in this register, via the Environmental Form – Fauna Sighting, Relocation, and Mortality CORP-EN-FRM-1045.

During this reporting period a total of 43 mortalities were reported on KML tenements (Table 5). Vehicle and train strikes accounted for all known causes of death. Kangaroos and Wallaroos were the most common species struck on the site roads (17 recorded). One Malleefowl mortalities occurred during the reporting period. A review of fauna mortalities recorded in the last six years across all KML tenements was completed as part of this report and presented as Table 5.

Fauna mortality numbers were significantly lower recorded in this reporting period compared to last reporting period, being 77 mortalities recorded in 2022/23 compared to 43 mortalities recorded in 2023/24.

Fauna mortality records over the last six years are still relatively low in comparison to the total man-hours and vehicle/train movements associated with the Project operations. Kangaroos and Wallaroos made up 39% of the number of animals struck on the road.

Table 5: Fauna Mortalities

Species	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Total Individuals
Australian Hobby (<i>Falco longipennis</i>)	0	0	0	0	0	1	0	1
Australian Bustard (<i>Ardeotis australis</i>)	1	0	0	0	0	1	0	2
Black Swan (<i>Cygnus atratus</i>)	0	0	0	0	0	0	1	1
Bungarra (<i>Varanus gouldii</i>)	0	0	0	0	0	4	4	8
Bronzewing (<i>Phaps chalcoptera</i>)	0	0	0	0	0	7	0	7
Cat (<i>Felis catus</i>)	0	1	0	0	0	1	1	3
Brown Falcon (<i>Falco berigora</i>)	1	0	0	0	0	0	1	2
Echidna (<i>Trachyglossidae</i> sp.)	0	0	0	1	2	0	1	4
Emu (<i>Dromaius novaehollandiae</i>)	2	0	1	4	1	2	1	11
Grey Teal Duck (<i>Anas gracilis</i>)	1	0	0	0	0	0	1	2
Kangaroo (<i>Macropus</i> sp.)	26	24	18	20	17	35	17	157
Magpie Lark (<i>Grallina cyanoleuca</i>)	1	0	0	0	0	0	0	1
Malleefowl (<i>Leipoa ocellata</i>)	1	0	0	0	2	2	1	6
Mulga Snake (<i>Pseudechis australis</i>)	0	1	2	0	1	0	0	4
Parrot sp. (<i>Psitttrichasiidae</i> sp.)	0	1	0	0	1	2	0	4
Perentie (<i>Varanus giganteus</i>)	0	1	0	0	1	0	1	3
Red-tailed Black Cockatoo (<i>Calyptorhynchus banksii</i>)	1	0	0	0	0	1	0	2
Snake, Jans Banded (<i>Simoselaps bertholdi</i>)	0	1	0	0	0	0	0	1

Species	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Total Individuals
Snake, Gwardar (<i>Pseudonaja nuchalis</i>)	1	0	1	0	0	2	2	6
Snake, Mulga (<i>Pseudechis australis</i>)	0	0	0	1	0	0	0	1
Snake, Stimsons Python (<i>Antaresia stimsoni</i>)	0	0	0	0	1	0	0	1
Snake, unknown	0	0	0	1	0	0	1	2
Sparrow	0	0	0	0	0	1	0	1
Spotted Nightjar (<i>Eurostopodus argus</i>)	1	0	0	0	0	0	1	2
Unknown bird	0	1	0	1	0	5	4	11
Western Spiny-tailed Skink (<i>Egernia stokesii badia</i>)	1	0	0	0	0	0	0	1
Monitor lizard (<i>Varanus sp.</i>)	0	1	2	0	0	1	1	5
Major Mitchell's cockatoo (<i>Lophochroa leadbeateri</i>)	0	0	1	0	0	0	0	1
Goat	0	0	1	0	0	0	0	1
Unknown bat	0	0	1	0	0	1	0	2
Rabbit (<i>Oryctolagus cuniculus</i>)	0	0	0	0	0	7	5	12
Welcome Swallow (<i>Hirundo neoxena</i>)	0	0	0	0	0	4	0	4
Total Individuals	37	31	27	28	26	77	43	269
Total number of species	11	8	8	7	8	17	16	75

6.4 Flora Management

During the reporting period, KML undertook management of flora in accordance with the following environmental plans and procedures:

- CORP-EN-PLN-1011 – Flora and Vegetation Management Plan
- CORP-EN-PLN-1012 – Flora and Vegetation Health Monitoring Plan
- CORP-EN-PRO-1009 – Flora, Weeds and Plant Pathogens Procedure

This section details our findings in relation to KML's management of its flora and vegetation health.

6.4.1 Vegetation Health

Condition 6.5 of MS805 and MS806 requires the minimisation of disturbance and/or loss of the Blue Hills PEC; specifically, through monitoring impacts from mining and mining-related activities due to dust, saline water application for dust control, fire and feral species.

KML have developed and implemented the following plans and procedures to meet legislative conditions in relation to flora and vegetation:

- CORP-EN-PLN-1011 – Flora and Vegetation Management Plan
- CORP-EN-PLN-1012 – Flora and Vegetation Health Monitoring Plan
- CORP-EN-PRO-1009 – Flora, Weeds and Plant Pathogens Procedure
- CORP-EN-PRO-1005 – Dust Monitoring Procedure
- CORP-EN-PRO-1004 – Approvals Requests and Ground Disturbance Procedure

During the reporting period monitoring data was collected during spring (September 2023). A total of 30 monitoring quadrats (20m by 20m) were assessed within HIOP, KIOP and MIOP, comprising of 25 quadrats adjacent to operational areas and five control quadrats distant from operations. The locations of the quadrats are shown in Figure 13 to Figure 16.

The following monitoring parameters of potential vegetation health threats were monitored:

- Weeds
- Dust
- Saline water
- Feral grazing
- Erosion

- Drought Stress
- Fire

Threats to vegetation health are monitored at each quadrat and assessed against Karara's internal impact rating scale, with 1 equating to 'nil' impact and 5 equating to 'extreme' impact. **Trigger** criteria have been set to forewarn adverse trends and **Threshold** criteria have been set to represent the limit of acceptable impact beyond which there is likely to be a significant effect on vegetation health. The following trigger and threshold criteria have been adopted by KML for assessing threats and impacts to vegetation health.

- **Trigger Criteria:** Any threat or impact (excluding rainfall and fire) that is given a rating of Moderate (3) **AND** no change detected at relevant control sites.
- **Threshold Criteria:** Any threat or impact (excluding rainfall and fire) that is given a rating of High (4) **AND** no change detected at relevant control sites.

Overall vegetation health is assessed using the Karara vegetation condition rating scale (Adapted from the Keighley Condition Rating Scale). The current Karara rating scale is based on a five-level quantitative rating system from 2 (Excellent) to 6 (Completely degraded). It should be noted that there have been changes to vegetation health classification categories used across reporting years (2011 – present). The rating scale of 1 (Pristine) was used for annual compliance reports from 2013 to 2015. However, this rating scale (1 Pristine) was removed from the vegetation health classification categories after 2015 annual compliance report, as it is not representative of the natural environment that the project is located within due to years of grazing impacts on the ex-pastoral leases. Details of the changes to vegetation health classification categories used since 2011 annual compliance report were provided to DWER on 9 November 2021 in response to the request for a more accurate representation of vegetation health data following DWER's audit of Condition 6.2 of MS805 and MS806 in September 2021.

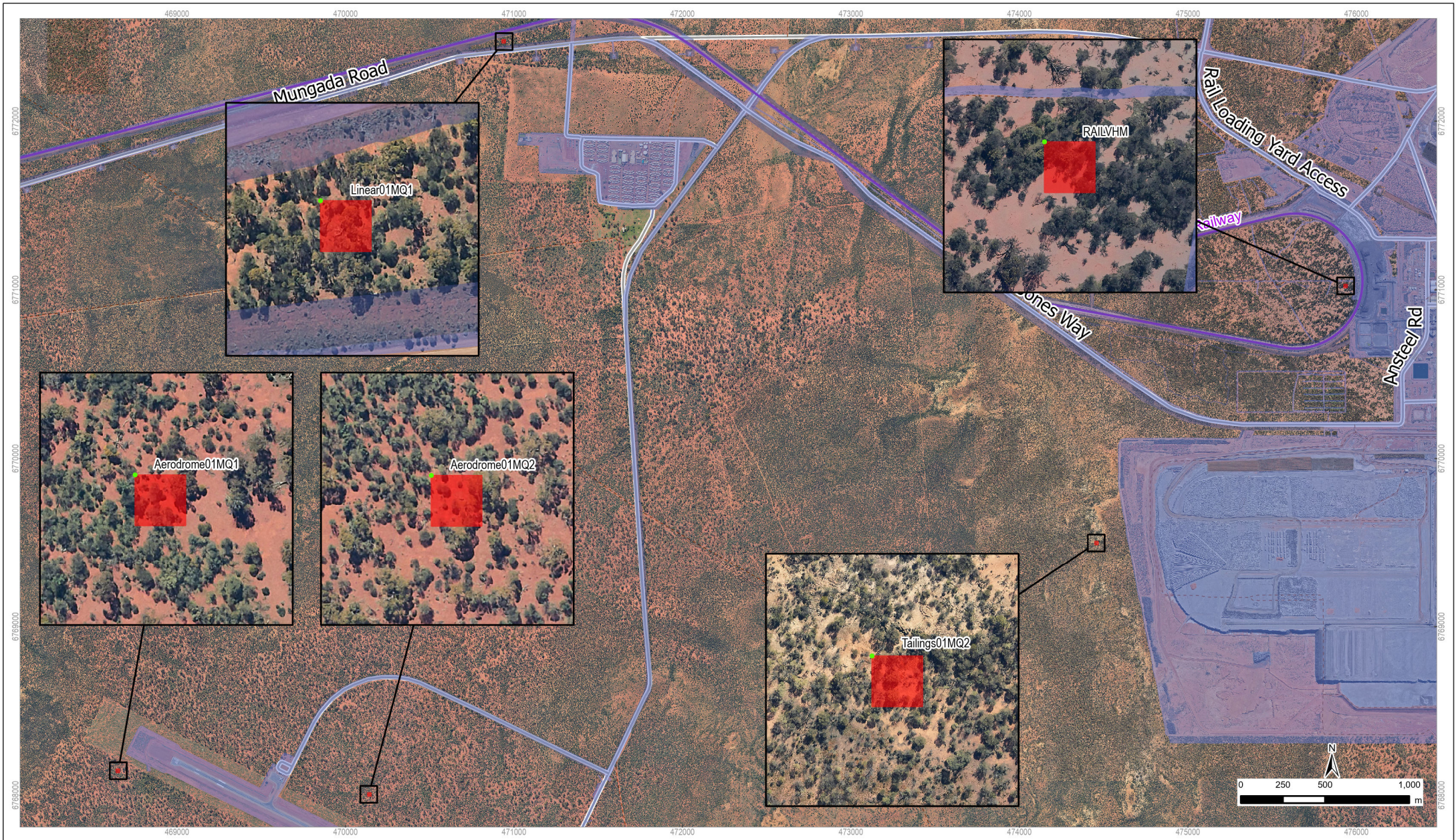
The currently adapted vegetation health rating scale utilises both a visual vegetation structure assessment and quantitative calculation of species diversity and density to generate an overall condition score for each quadrat. Based on historical monitoring results and ensuring a conservative approach prior to potential impact to the health of vegetation, the following trigger and threshold criteria have been adopted by KML for vegetation condition.

- **Trigger Criteria:** Condition rating of very good (3) **AND** no change detected at relevant control site.

- **Threshold Criteria:** Condition rating of good (4) **AND** no change detected at relevant control site.

Following exceedance of the trigger or threshold criteria, KML initiates responsive actions in accordance with the KML Environmental Plan – Flora and Vegetation Health Monitoring CORP-EN-PLN-1012.

Figure 13: Vegetation Health Monitoring Quadrats at KIOP1



MS Annual Compliance Report (2024)

Vegetation Health Monitoring Quadrats at KIOP 1

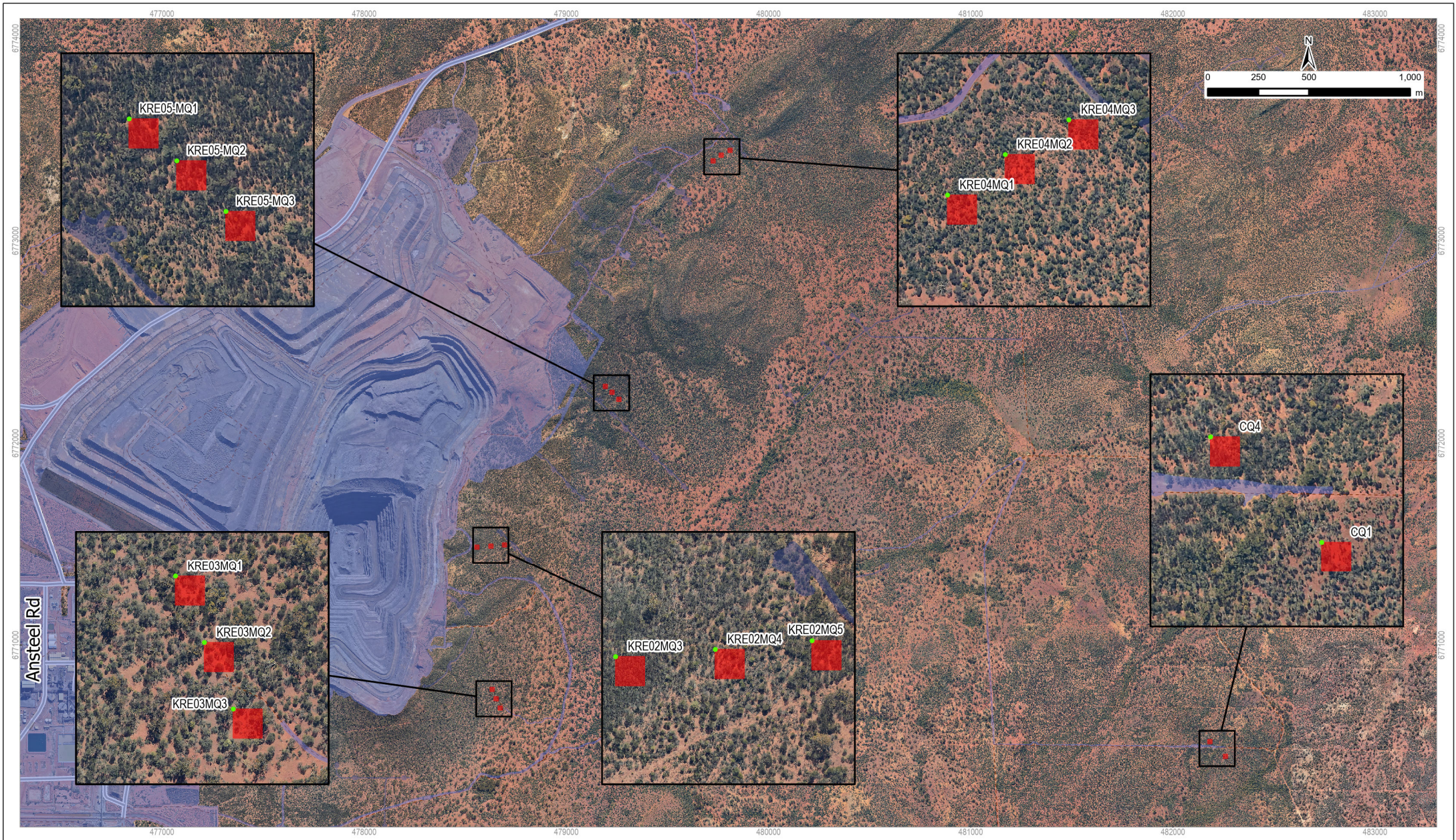


- Veg Health Monitoring Photo
- Veg Health Monitoring Quadrats
- Railway (Freight)
- Roads Regional
- Main
- Minor
- Highway
- Track
- KML Open Ground Disturbance
- KML Open Ground Disturbance
- KML Rehabilitation



Ref: K0170 F10 Proj: GDA94 MGAZ50
 Version: A Scale: 1:30,000
 1 August 2024 Size: A4

Figure 14: Vegetation Health Monitoring Quadrats at KIOP2



MS Annual Compliance Report (2024)

Vegetation Health Monitoring Quadrats at KIOP 2

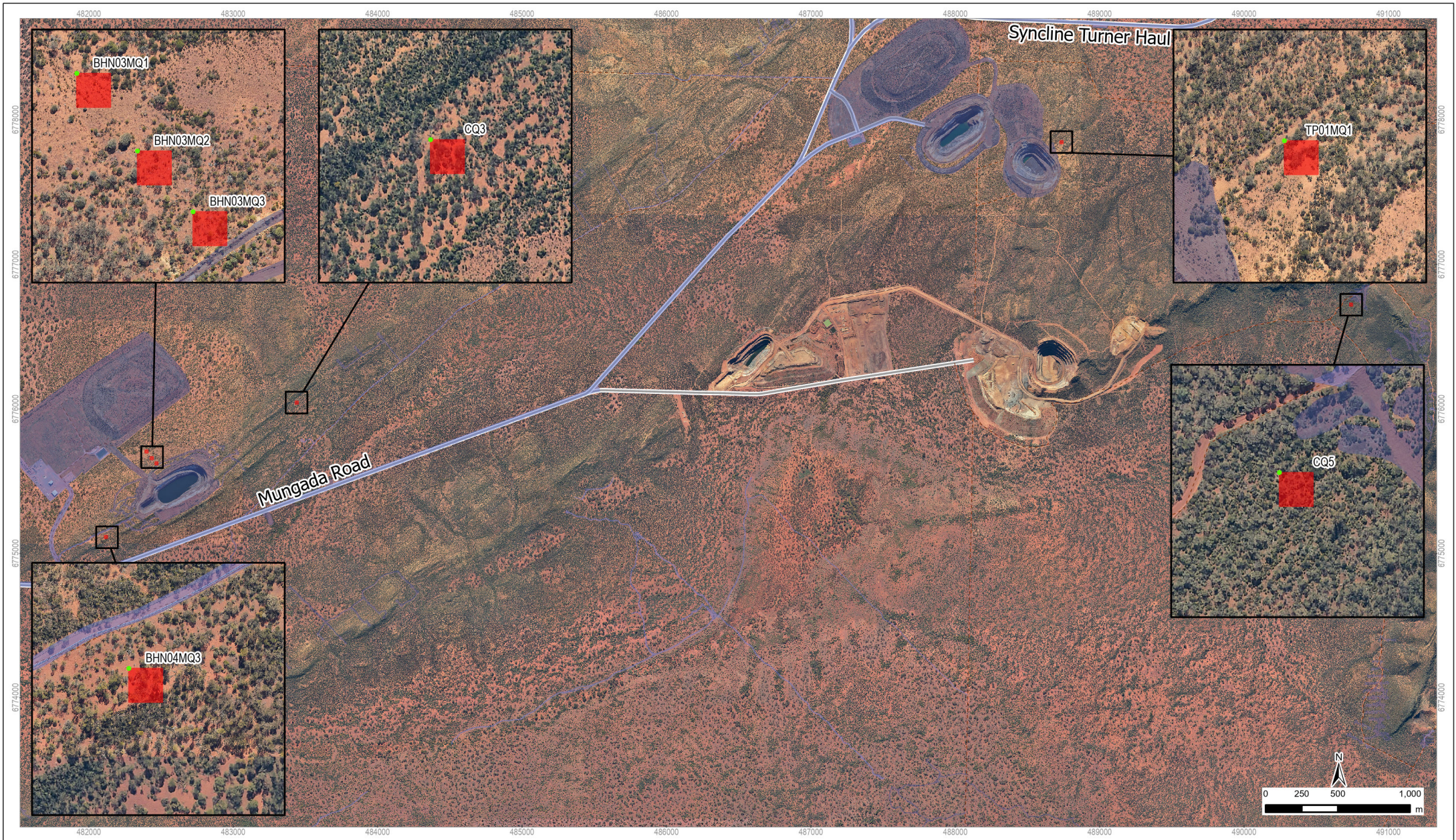


- Veg Health Monitoring Photo
- Veg Health Monitoring Quadrats
- Railway (Freight)
- Roads Regional
- Main
- Minor
- Highway
- - - Track
- KML Open Ground Disturbance
- KML Open Ground Disturbance
- KML Rehabilitation



Ref: K0170 F11 Proj: GDA94 MGAZ50
 Version: A Scale: 1:25,000
 1 August 2024 Size: A4

Figure 15: Vegetation Health Monitoring Quadrats at MIOP



MS Annual Compliance Report
(2024)
Vegetation Health Monitoring
Quadrats at MIOP

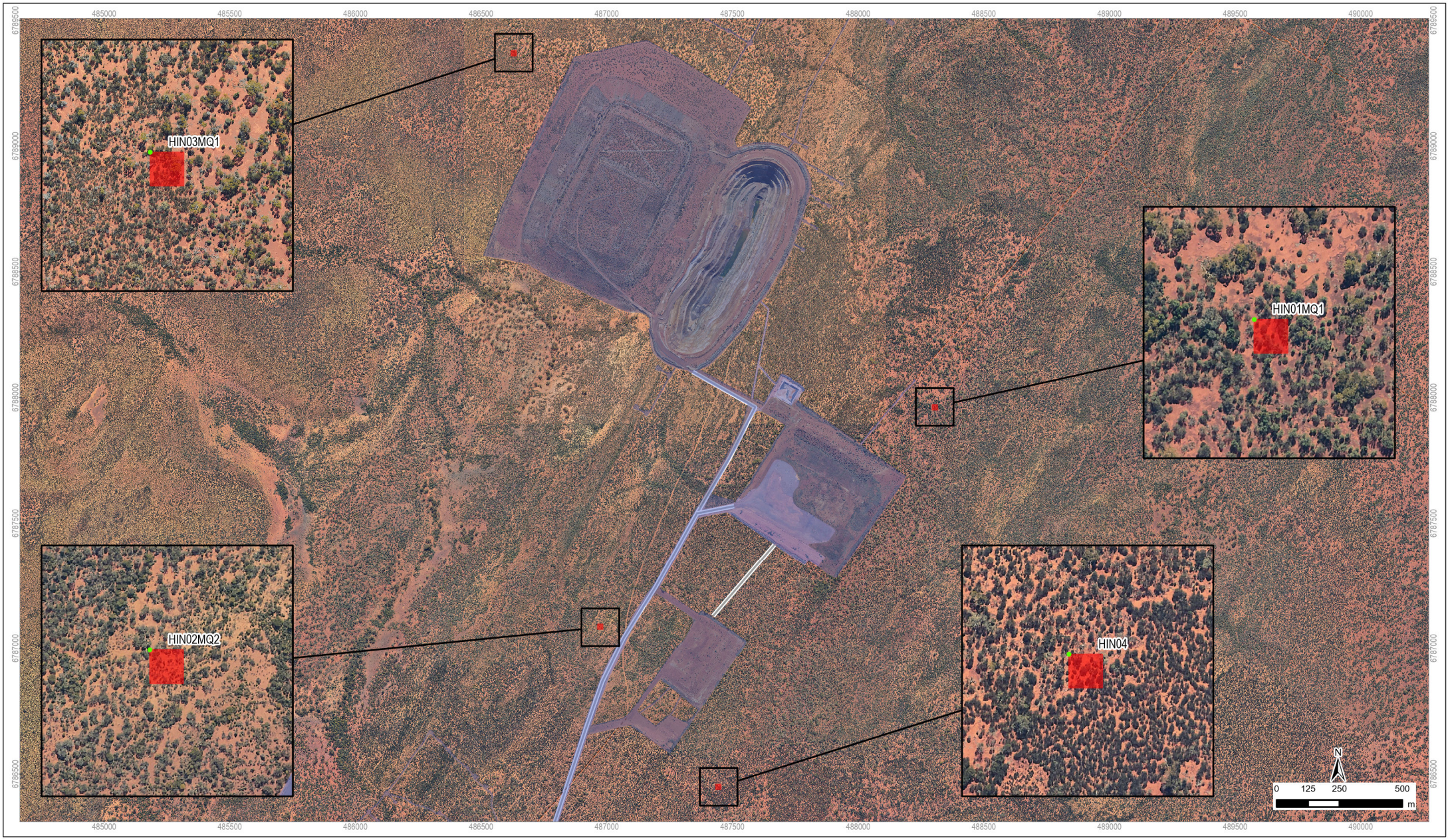


- Veg Health Monitoring Photo
- Veg Health Monitoring Quadrats
- Railway (Freight)
- Roads Regional
- Main
- Minor
- Highway
- Track
- KML Open Ground Disturbance
- KML Rehabilitation



Ref: K0170 F12 Proj: GDA94 MGAZ50
Version: A Scale: 1:35,000
1 August 2024 Size: A4

Figure 16: Vegetation Health Monitoring Quadrats at HIOP



MS Annual Compliance Report
(2024)

**Vegetation Health Monitoring
Quadrats at HIOP**



- Veg Health Monitoring Photo
- Veg Health Monitoring Quadrats
- Railway (Freight)
- Highway
- Roads Regional
- Main
- Minor
- Highway
- - - Track
- KML Open Ground Disturbance
- KML Open Ground Disturbance
- KML Rehabilitation



Ref: K0170 F13 Proj: GDA94 MGAZ50
Version: A Scale: 1:20,000
1 August 2024 Size: A4

6.4.1.1 Weeds

KML monitors the percentage of weed cover at all sites to determine if mining operations have spread existing weed populations and/or increased weed density within the monitoring areas. During the reporting period, all the sites recorded weed percentage cover rating of 1 (less than 1% of weeds, Table 6). KML will continue to monitor for the weed in future surveys and manage if required. No trigger or threshold criteria were exceeded during the reporting period and thus no responsive actions were required in relation to weeds.

Table 6: Weed cover impact ratings at monitoring and analogue (CQ1-5 & HIN04) sites

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23
MIOP	BHN03MQ1	1	1	1	1	1	1
	BHN03MQ2	1	1	1	1	1	1
	BHN03MQ3	1	1	1	1	1	1
	BHN04MQ3	1	1	1	1	1	1
	TP01MQ1	1	1	1	1	1	1
	CQ3 (analogue)	1	1	1	1	1	1
	CQ5 (analogue)	1	1	1	1	1	1
HIOP	HIN01MQ1	1	1	1	1	1	1
	HIN02MQ2	1	1	1	1	1	1
	HIN03MQ1	1	1	1	1	1	1
	HIN04 (analogue)	1	1	1	1	1	1
KIOP	AERODROME01MQ1	1	1	1	1	1	1
	AERODROME01MQ2	1	1	1	1	1	1
	KRE02MQ3	1	1	1	1	1	1
	KRE02MQ4	1	1	1	1	1	1
	KRE02MQ5	1	1	1	1	1	1
	KRE03MQ1	1	1	1	1	1	1
	KRE03MQ2	1	1	1	1	1	1
	KRE03MQ3	1	1	1	1	1	1
	KRE04MQ1	1	1	1	1	1	1

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23
	KRE04MQ2	1	2	1	1	1	1
	KRE04MQ3	2	2	1	1	1	1
	KRE05MQ1	-	1	1	1	1	1
	KRE05MQ2	-	1	1	1	1	1
	KRE05MQ3	-	1	1	1	1	1
	LINEAR01MQ1	1	1	1	1	1	1
	TAILINGS01MQ2	1	1	2	1	1	1
	RAILVHM	1	1	2	2	2	1
	CQ1 (analogue)	1	1	1	1	1	1
	CQ4 (analogue)	1	1	1	1	1	1

*Scale 1 = Nil (<1% weeds), 2 = low (1-15% weeds), 3 = moderate (15-30% weeds), 4 = High (30 -60% weeds), 5 = Extreme (60-90% weeds). N/A = not assessed.

6.4.1.2 Foliage Dust Cover

KML monitor dust impacts on vegetation health through annual visual assessment of dust coverage on foliage within the quadrats and monthly dust depositional analysis results. Dust depositional monitoring is covered in Section 6.1 of this report.

Most of monitoring sites recorded nil to low dust levels (Table 7) during the reporting period, however the quadrat RAILVHM located within the rail loop continued to be recorded a dust coverage rating of 5 (extreme), this rating is attributed to the dust emitted from the magnetite stockpiles which produce a dark fine dust.

Table 7 indicates that dust coverage ratings recorded at all the KRE02 and KRE03 quadrats have increased from 'nil' and 'low' (rating of 1 and 2) to 'moderate' (rating of 3) or 'high' (rating of 4) during the reporting period, the KRE04MQ1 quadrat also recorded an increase from 'nil' (rating of 1) to 'low' (rating of 2). Dust coverage levels at TAILINGS01MQ2 quadrat showed an increment from 'nil' (rating of 1) to 'moderate' (rating of 3). Dust coverage ratings at all the quadrats at MIOP and HIOP remain 'nil' (rating of 1).

Incremental dust coverage ratings at the KRE02 and KRE03 quadrats are likely to be attributed to increased mining operations adjacent to Karara pit area (Stage 5). Local dust storms and reduced stockpile moisture/watering at the rail loop (TLO) may potentially cause the increased dust coverage at quadrat RAILVHM. Low rainfall rates recorded during the

reporting period in conjunction with strong winds are also considered to contribute to the increased dust foliage coverage on the vegetation. Enhanced dust management measures were implemented by the mining contractor around east and southeast of Karara pit, including increased uses of water trucks and dust suppressant. Blasting, haulage and train loading is also avoided during high wind conditions.

Dusting of vegetation will continue to be monitored closely for excess dust on foliage and, if required, additional management actions will be undertaken in accordance with KML's Environmental Plan – Flora and Vegetation Health Monitoring CORP-EN-PLN-1012.

Table 7: Percentage dust cover impact ratings recorded at the vegetation health monitoring and control (CQ1-5 & HIN04) sites

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23
MIOP	BHN03MQ1	1	1	1	1	1	1
	BHN03MQ2	1	1	1	1	1	1
	BHN03MQ3	1	1	1	1	1	1
	BHN04MQ3	1	1	1	1	1	1
	TP01MQ1	1	1	1	1	1	1
	CQ3 (analogue)	1	1	1	1	1	1
	CQ5 (analogue)	1	1	1	1	1	1
HIOP	HIN01MQ1	1	1	1	1	1	1
	HIN02MQ2	1	1	1	1	1	1
	HIN03MQ1	1	1	1	1	1	1
	HIN04 (analogue)	1	1	1	1	1	1
KIOP	AERODROME01MQ1	1	1	1	1	1	1
	AERODROME01MQ2	1	1	1	1	1	1
	KRE02MQ3	4	2	4	4	2	4
	KRE02MQ4	4	1	2	4	2	3
	KRE02MQ5	3	1	2	3	1	3
	KRE03MQ1	3	2	2	4	2	3
	KRE03MQ2	3	1	2	4	1	3
	KRE03MQ3	3	1	2	4	2	3

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23
	KRE04MQ1	1	1	1	1	1	2
	KRE04MQ2	1	1	1	1	1	1
	KRE04MQ3	1	1	1	1	1	1
	KRE05MQ1	-	1	2	2	1	1
	KRE05MQ2	-	1	2	2	1	1
	KRE05MQ3	-	1	2	1	1	1
	LINEAR01MQ1	1	1	2	2	1	1
	TAILINGS01MQ2	1	1	3	3	1	3
	RAIL VHM	4	4	5	5	5	5
	CQ1 (analogue)	1	1	1	1	1	1
	CQ4 (analogue)	1	1	1	1	1	1

*Scale 1 = Nil dust, 2 = low dust (0-5% of plants), 3 = moderate (5-15% of plants), 4 = High (15-50% of plants), 5 = Extreme (>50% of plants). N/A = not assessed.

6.4.1.3 Soil salinity

KML monitors potential impacts to vegetation from saline water overspray through analysis of soil salinity levels and observational assessments of salt residue on vegetation foliage and soil surfaces. The soils within Karara's monitoring and control sites are reported by Jenny Borger (2012) as clay loams. In a report written by the Department of Agriculture and Food (2006), 'non saline' clay loams are defined as below 22 mS/m (rating of 1) and 'slightly saline' clay loams are between 22 and 44 mS/m (rating of 2).

During the reporting period salinity ratings (Table 8) for most sites recorded rating of 1 (non-saline) with only a low salinity (rating of 2) being recorded at BHN04MQ3 (25 mS/m). TP01MQ1 and LINEAR01MQ1 quadrats showed a reduction in salinity rating from 'low' (rating of 2) to 'nil' (rating of 1) in comparison to last year's reporting period. Salinity rating at analogue site CQ3 also decreased from 'moderate' (rating of 3) to 'low' (rating of 2) with a value of 32 mS/m being recorded in 2023. The vegetation health condition at CQ3 was recorded as 'excellent' (rating of 2) during the reporting period. No visual evidence of salt staining on soil or foliage was recorded at monitoring quadrats or threshold criteria were exceeded. Overall, soil salinity levels have remained constant across all sites, indicating that potential water overspray for dust suppression is not impacting on soil salinity levels.

Table 8: Salinity ratings recorded at the vegetation health monitoring and control (CQ1-5 & HIN04) sites

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23
MIOP	BHN03MQ1	1	1	1	1	1	1
	BHN03MQ2	1	1	1	1	1	1
	BHN03MQ3	1	1	1	1	1	1
	BHN04MQ3	1	1	1	2	1	2
	TP01MQ1	1	2	3	1	2	1
	CQ3 (analogue)	1	2	1	3	3	2
	CQ5 (analogue)	1	1	1	1	1	1
HIOP	HIN01MQ1	1	1	1	1	1	1
	HIN02MQ2	1	1	1	1	1	1
	HIN03MQ1	1	1	1	1	1	1
	HIN04 (analogue)	1	1	1	1	1	1
KIOP	AERODROME01MQ1	1	1	1	1	1	1
	AERODROME01MQ2	1	1	1	1	1	1
	KRE02MQ3	1	1	1	1	1	1
	KRE02MQ4	1	1	1	1	1	1
	KRE02MQ5	1	1	1	1	1	1
	KRE03MQ1	1	1	1	1	1	1
	KRE03MQ2	1	1	1	1	1	1
	KRE03MQ3	1	1	1	1	1	1
	KRE04MQ1	1	1	1	1	1	1
	KRE04MQ2	1	1	1	1	1	1
	KRE04MQ3	1	1	1	1	1	1
	KRE05MQ1	-	1	1	1	1	1
	KRE05MQ2	-	1	1	1	1	1
	KRE05MQ3	-	1	1	1	1	1

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23
	LINEAR01MQ1	1	1	1	1	2	1
	TAILINGS01MQ2	1	1	1	1	1	1
	RAILVHM	1	1	1	1	1	1
	CQ1 (analogue)	1	1	1	2	1	1
	CQ4 (analogue)	1	1	1	1	1	1

*Scale 1 = Nil (<22 mS/m), 2 = Low (22-44 mS/m), 3 = Moderate (44-89 mS/m), 4 = High (89-178 mS/m), 5 = Extreme (>178 mS/m), N/A = not assessed.

6.4.1.4 Vegetation grazing

KML monitor feral fauna impacts to vegetation by recording evidence of vegetation grazing by feral goats and rabbits. During the reporting period, all sites recorded nil or low amounts (< 5% within the quadrat affected) of grazing by feral animals (Table 9) and no trigger or threshold criteria were exceeded. As a result, feral grazing is not considered to impact vegetation health. Feral management is discussed in more details in Section 6.2.4.

Table 9: Vegetation grazing impact ratings recorded at the vegetation health monitoring and control (CQ1-5 & HINO4) sites

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23
MIOP	BHN03MQ1	1	2	1	1	2	2
	BHN03MQ2	1	1	1	1	1	1
	BHN03MQ3	1	1	1	1	1	1
	BHN04MQ3	1	1	1	1	1	1
	TP01MQ1	1	1	1	1	1	1
	CQ3 (analogue)	1	1	1	1	1	1
	CQ5 (analogue)	1	1	2	2	1	1
HIOP	HIN01MQ1	2	2	1	1	1	1
	HIN02MQ2	2	1	1	1	1	1
	HIN03MQ1	1	1	1	1	1	1
	HIN04 (analogue)	2	2	1	1	1	1
KIOP	AERODROME01MQ1	2	1	2	1	1	2

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23
	AERODROME01MQ2	1	2	2	1	1	2
	KRE02MQ3	1	1	1	1	1	1
	KRE02MQ4	1	1	1	1	1	1
	KRE02MQ5	1	2	1	1	1	1
	KRE03MQ1	2	1	1	1	1	1
	KRE03MQ2	1	1	1	1	1	1
	KRE03MQ3	1	2	1	1	1	1
	KRE04MQ1	1	1	1	1	1	1
	KRE04MQ2	2	1	1	1	1	1
	KRE04MQ3	2	1	1	1	1	1
	KRE05MQ1	-	1	1	1	1	1
	KRE05MQ2	-	1	1	1	1	1
	KRE05MQ3	-	1	1	1	1	1
	LINEAR01MQ1	1	1	1	1	1	2
	TAILINGS01MQ2	1	1	1	1	1	1
	RAILVHM	1	1	1	1	1	2
	CQ1 (analogue)	2	1	1	1	1	1
	CQ4 (analogue)	1	1	1	1	1	1

*Scale 1 = no grazing, 2 = low grazing (0-5%), 3 = moderate grazing (5-15%), 4 = high grazing (15-50%), 5 = extreme grazing (>50%). N/A = not assessed.

6.4.1.5 Erosion

Erosion is visually assessed at each quadrat to determine if KML's operations are resulting in increased land instability and sedimentation. During the reporting period, 23 out the 30 quadrats recorded no evidence of erosion, as they are located in natural undisturbed landscapes. Five quadrats recorded erosion scores of 'low' (0 - 5% of topsoil loss) at BHN03MQ2, KRE03MQ1, KRE03MQ3, KRE04MQ1 and KRE04MQ2. Score of 'moderate' (>5 - 15% of topsoil loss) was recorded at BHN03MQ1 and KRE03MQ2 (Table 10). These sites will continue to be monitored for any potential increase of erosion.

The BHN03MQ1 quadrat erosion score has remained unchanged with a value of 3 (moderate) since last year's reporting period. This sustained moderate erosion score could be potentially associated with active erosive process along channels, back cutting, sedimentation behind the adjacent coir logs and several diggings most likely caused by rabbits. Erosion score at KRE03MQ2 quadrat has increased from 2 (low) to 3 (moderate), which was likely due to incremented echidnas' activity (diggings) along the quadrat. Increased scores of 2 (low) were also recorded at BHN03MQ2, KRE04MQ1 and KRE04MQ2 quadrats, which might be potentially attributed to the presence of several diggings mostly caused by echidnas. Erosion scores remained unchanged with a value of 2 (low) at KRE03MQ1 and KRE03MQ3 quadrats.

The vegetation conditions recorded at those quadrats were rated as 'Very Good' or 'Good' condition (scores of 3 or 4). No erosion mitigation measures have been recently implemented. The erosion mitigation measures will be implemented at the monitoring sites with low or moderate erosion impacts if needed.

Table 10: Erosion impacts recorded at the KIOP vegetation health monitoring and control sites

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23
MIOP	BHN03MQ1	2	2	2	2	3	3
	BHN03MQ2	1	2	1	2	1	2
	BHN03MQ3	1	1	1	1	1	1
	BHN04MQ3	1	1	1	1	1	1
	TP01MQ1	1	2	2	1	1	1
	CQ3 (analogue)	1	1	1	1	1	1
	CQ5 (analogue)	1	1	1	1	1	1
HIOP	HIN01MQ1	1	1	1	1	1	1
	HIN02MQ2	1	1	1	1	1	1
	HIN03MQ1	1	1	1	1	1	1
	HIN04 (analogue)	1	1	1	1	2	1
KIOP	AERODROME01MQ1	1	1	1	1	1	1
	AERODROME01MQ2	1	1	1	2	1	1
	KRE02MQ3	1	1	1	1	1	1

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23
	KRE02MQ4	1	1	1	1	1	1
	KRE02MQ5	1	1	1	1	1	1
	KRE03MQ1	1	1	2	1	2	2
	KRE03MQ2	2	2	2	3	2	3
	KRE03MQ3	1	1	1	1	2	2
	KRE04MQ1	1	1	1	1	1	2
	KRE04MQ2	1	1	1	1	1	2
	KRE04MQ3	1	1	1	1	1	1
	KRE05MQ1	-	1	1	1	1	1
	KRE05MQ2	-	1	1	1	1	1
	KRE05MQ3	-	1	1	2	1	1
	LINEAR01MQ1	1	1	1	1	1	1
	TAILINGS01MQ2	1	1	1	1	1	1
	RAILVHM	1	1	1	1	2	1
	CQ1 (analogue)	1	1	1	1	1	1
	CQ4 (analogue)	1	1	1	1	1	1

**Scale 1 = Nil, 2 = Low (>0-5% of topsoil loss), 3 = moderate (>5-15% moderate topsoil loss and runoff channels), 4 = High (>15-50% severe topsoil loss), 5 = Extreme (>50% complete truncation of soil profile, exposure of subsoil). N/A = not assessed.*

6.4.1.6 Rainfall and climate

Rainfall is monitored to account for changes in vegetation health due to rainfall variability. Rainfall figures are recorded on site daily and graphed into monthly totals (Figure 17).

The Midwest region where the Karara mine site is located, has been experiencing a decline in winter rainfall over a number of decades. This can sometimes be offset by the remnants of tropical low pressure systems bringing summer rainfall, however these systems are typically less reliable and patchier than the rain bearing fronts that occur during winter. It was particularly dry at the Karara mine site in 2019 and 2020, while a recovery of total annual rainfall was recorded in 2021 and 2022 (Figure 18). However, the total annual rainfall recorded

in 2023 was 232.6mm, being the second lowest recorded annual rainfall since the driest reporting period in 2019 (166.25mm).

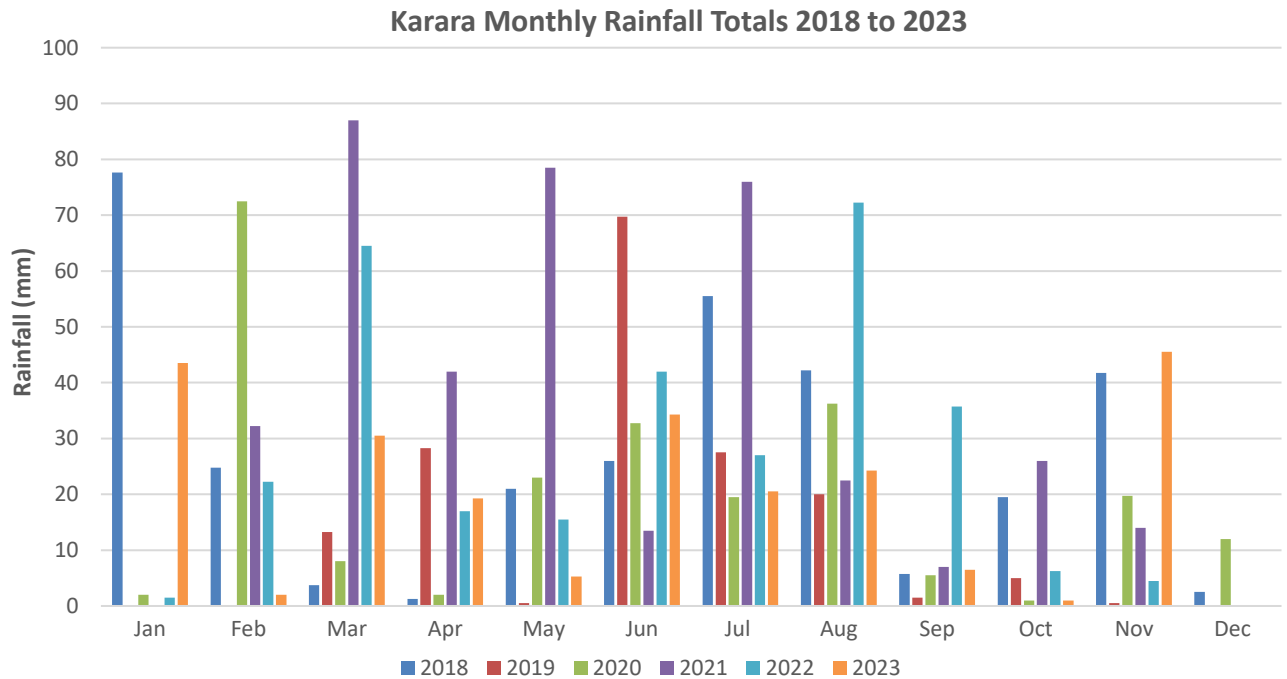


Figure 17: Monthly Rainfall for the Karara Mine Site (2018 – 2023)

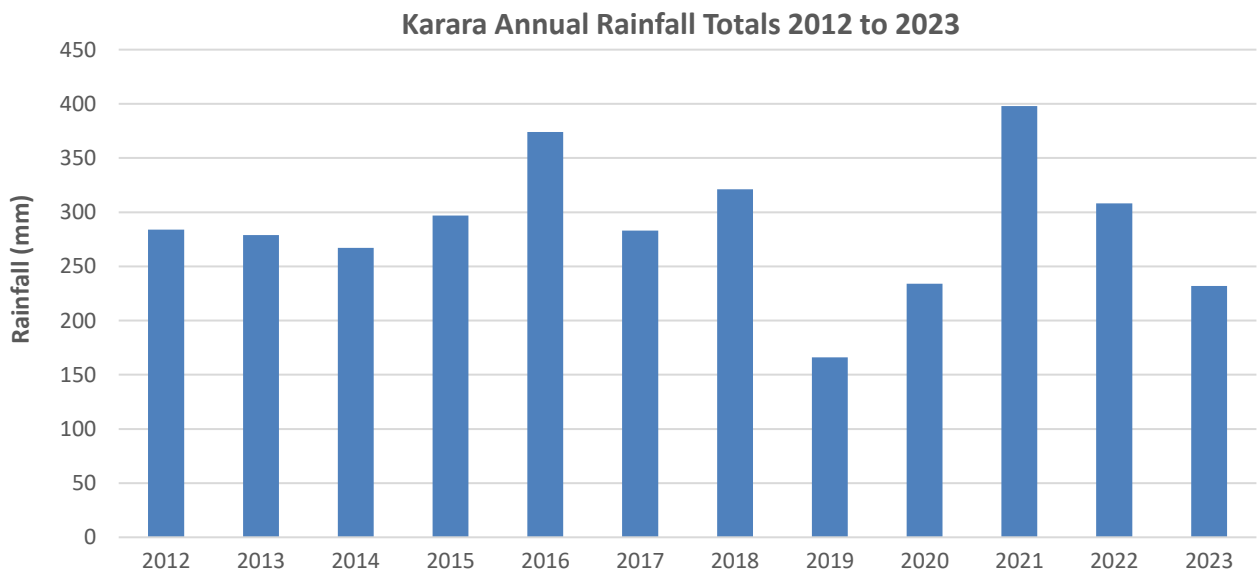


Figure 18: Annual Rainfall for the Karara Mine Site (2012 – 2023)

6.4.1.7 Fire Impacts

Since commencement of operation in 2013, no fires have been reported on KML managed land and as a result fire has not had an impact on vegetation health at Karara.

6.4.1.8 Vegetation Condition Rating

During the reporting period, 9 of 30 quadrats recorded a vegetation condition rating of 'Excellent' (2), 19 of 30 quadrats recorded a rating of 'Very Good' (3) and the remaining 2 quadrats recorded a rating of 'Good' (4).

Decline in vegetation condition rating from 'Very Good' (3) to 'Good' (4) was recorded at BHN03MQ1 and RAILVHM quadrats (Table 11). At BHN03MQ1 quadrat, vegetation condition rating has declined mainly due to a progressing erosive process, reduced count species compared to last year's reporting, deteriorated ground cover, presence of litter and increased diggings most likely caused by rabbits. Decline in vegetation condition at RAILVHM was potentially attributed to persistent dust emitted from the magnetite stockpiles leading to stressed vegetation along with several rabbit's diggings and cat tracks being recorded across the quadrat.

BHN03MQ3, HIN01MQ1, KRE02MQ5, KRE04MQ1 and KRE04MQ2 quadrats have recorded a slight decline in vegetation condition rating from 'Excellent' (2) to 'Very Good' (3) being mostly attributable to increased weeds, higher species death rate, water stress/drought and incremented echidna's activity (higher presence of diggings).

All the KRE02, KRE03, KRE04 and KRE05 quadrats have recorded either an unchanged rating of 'Very Good' (3) compared to the last year's reporting period or decline in vegetation condition rating from 'Excellent' (2) to 'Very Good' (3), which might be potentially associated with water stress/drought in 2023. Increased dust foliage coverage, reduced count species and recorded increased echidna's activity were also considered to contribute the declined vegetation condition at these quadrats.

Vegetation condition rating at HIN03MQ1, HIN04, AERODROME01MQ1 and AERODROME01MQ2 quadrats remained unchanged with a rating of 'Very Good' (3) compared to last year's monitoring.

The quadrats with a declined vegetation condition recorded in the reporting period will be closely monitored in future reporting periods to determine potential measures to be implemented for improvement of the vegetation condition at those quadrats. Although total annual rainfall has been progressively decreasing over the last three year's reporting periods (Figure 18), recovery in overall vegetation condition is expected to be recorded in the

upcoming vegetation health monitoring in September 2024 as measured rainfall during 2024 (particularly in June 2024) has been significantly higher than any year since rainfall monitoring started in 2011.

Table 11: Vegetation conditions ratings recorded at the vegetation health monitoring and control sites

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23
MIOP	BHN03MQ1	3	3	3	3	3	4
	BHN03MQ2	3	3	2	3	3	3
	BHN03MQ3	3	3	2	2	2	3
	BHN04MQ3	2	2	2	2	2	2
	TP01MQ1	2	2	2	2	2	2
	CQ3 (analogue)	2	2	2	2	2	2
	CQ5 (analogue)	2	2	2	2	2	2
HIOP	HIN01MQ1	2	2	2	2	2	3
	HIN02MQ2	2	2	2	2	2	2
	HIN03MQ1	2	2	2	2	3	3
	HIN04 (analogue)	2	2	3	3	3	3
KIOP	AERODROME01MQ1	2	2	2	2	3	3
	AERODROME01MQ2	2	3	3	3	3	3
	KRE02MQ3	3	2	2	3	3	3
	KRE02MQ4	3	2	2	3	3	3
	KRE02MQ5	2	2	2	2	2	3
	KRE03MQ1	2	2	2	2	3	3
	KRE03MQ2	3	2	3	3	3	3
	KRE03MQ3	3	3	3	3	3	3
	KRE04MQ1	2	2	2	2	2	3
	KRE04MQ2	2	2	2	2	2	3

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23
	KRE04MQ3	2	2	2	2	2	2
	KRE05MQ1	-	2	2	2	3	3
	KRE05MQ2	-	2	2	2	3	3
	KRE05MQ3	-	2	2	2	3	3
	LINEAR01MQ1	2	3	3	3	3	3
	TAILINGS01MQ2	2	2	2	2	2	2
	RAILVHM	2	3	3	3	3	4
	CQ1 (analogue)	2	2	2	2	2	2
	CQ4 (analogue)	2	2	2	2	2	2

*Note: *Relative condition rating based on revised vegetation health monitoring methodology was approved for 2016 onwards. Condition rankings 1 = pristine, 2 = excellent, 3 = very good, 4 = good, 5 = degraded, 6 = completely degraded.*

6.5 Rehabilitation

During the reporting period, KML undertook progressive rehabilitation and rehabilitation performance monitoring, in accordance with the following KML environmental procedures:

- CORP-EN-PRO-1002 – Land Rehabilitation
- CORP-EN-PRO-1040 – Rehabilitation Performance Monitoring

KML ensures implementation of all environmental management measures through regular environmental inspections and audits.

KML maintains a Rehabilitation Schedule CORP-EN-SCH-1006 to meet MS805 (condition 12-1-2) and MS806 (condition 11-1-2), which requires “A schedule of the rate of rehabilitation acceptable to the CEO of the Department of Environment and Conservation, and the Director Environment of the Department of Mines and Petroleum.” The Rehabilitation Schedule was submitted to the DWER and approved on the 30 August 2013. A revision to the schedule was made in April 2020 and provided to the DWER for endorsement. A formal endorsement is yet to be received from DWER.

KML continues to progressively rehabilitate disturbed areas, as per the Rehabilitation Schedule. Ongoing monitoring indicates that all rehabilitated areas are continuing to

rehabilitate well and are likely to meet the requirement of >70% species composition (not including weed species) within 5 years following the cessation of productive mining.

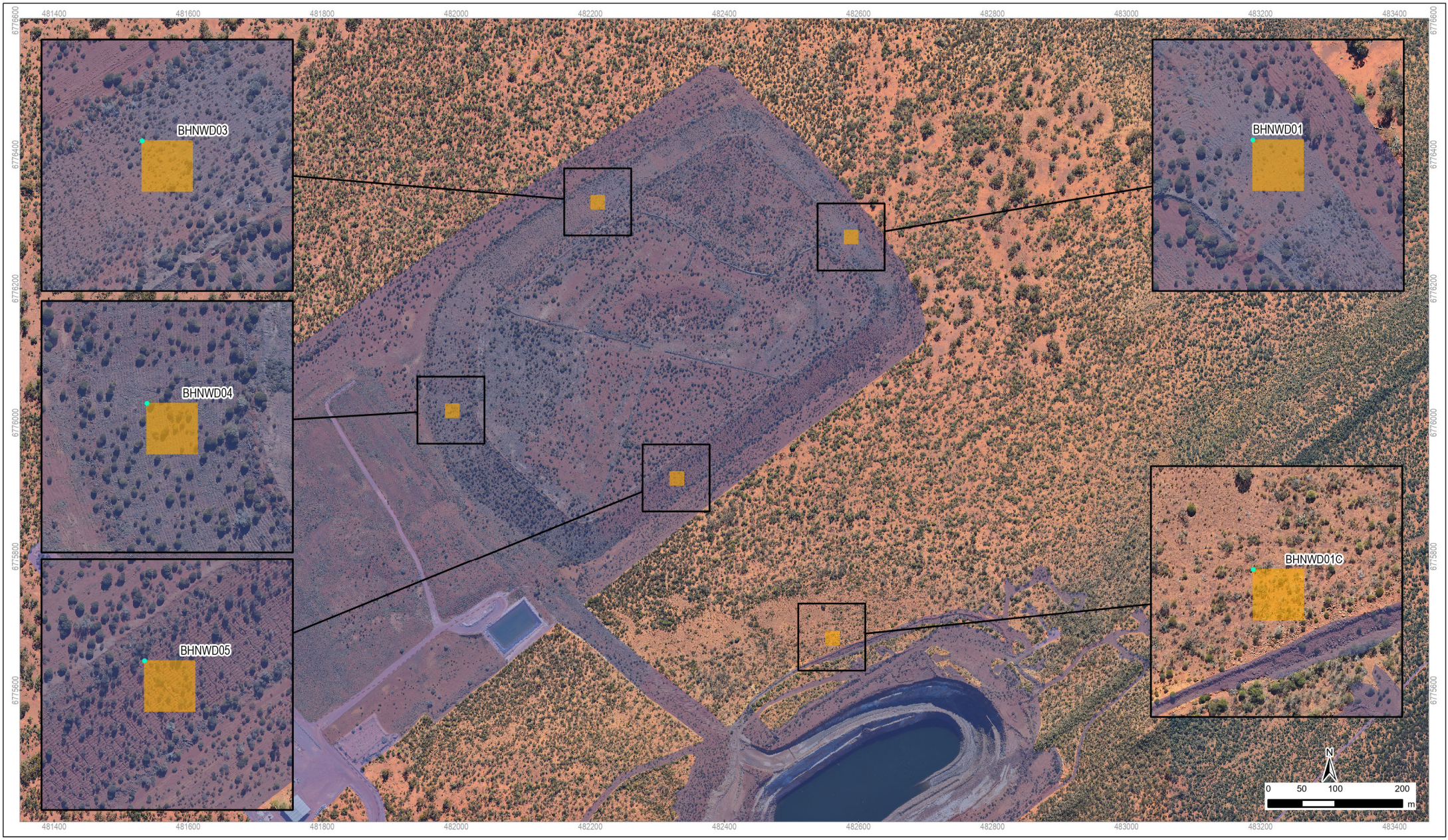
6.5.1 Rehabilitation Performance monitoring

To track progress towards achieving the closure objective of “establishing a rehabilitated ecosystem that retains the biological values of the surrounding natural ecosystem”, KML undertake annual assessments each September/October of rehabilitation performance. In accordance with condition 11 of MS805 and MS806 and the KML Mine Closure Plan CORP-EN-PLN-1038, the following criteria are to be met within five years following the cessation of productive mining:

- Flora and vegetation are re-established with not less than 70% species composition (KML define species composition as the diversity of the rehabilitated site (H_{rehab}) relative to the corresponding analogue site ($H_{control}$)).
- Weed coverage consistent with recorded baseline levels or 10%, whichever is less.
- Vegetation density, species richness and weed coverage is to be comparable to the surrounding area, as determined by analogue flora and vegetation surveys.

During the report period, KML monitored 36 rehabilitation monitoring quadrats (20m by 20m or 40m by 10m), comprising of 27 quadrats within rehabilitated sites and 9 control quadrats in surrounding natural vegetation. Monitoring quadrats have been established within the rehabilitated areas of the waste rock dumps (Blue Hills, Terapod, Hinge & Karara), and linear infrastructure corridors (Pipeline) (Figure 19 to Figure 23).

Figure 19: Rehabilitation monitoring quadrats at Blue Hills North Waste Rock Dump



MS Annual Compliance Report
(2024)

Rehabilitation Health
Monitoring Quadrats at BHN

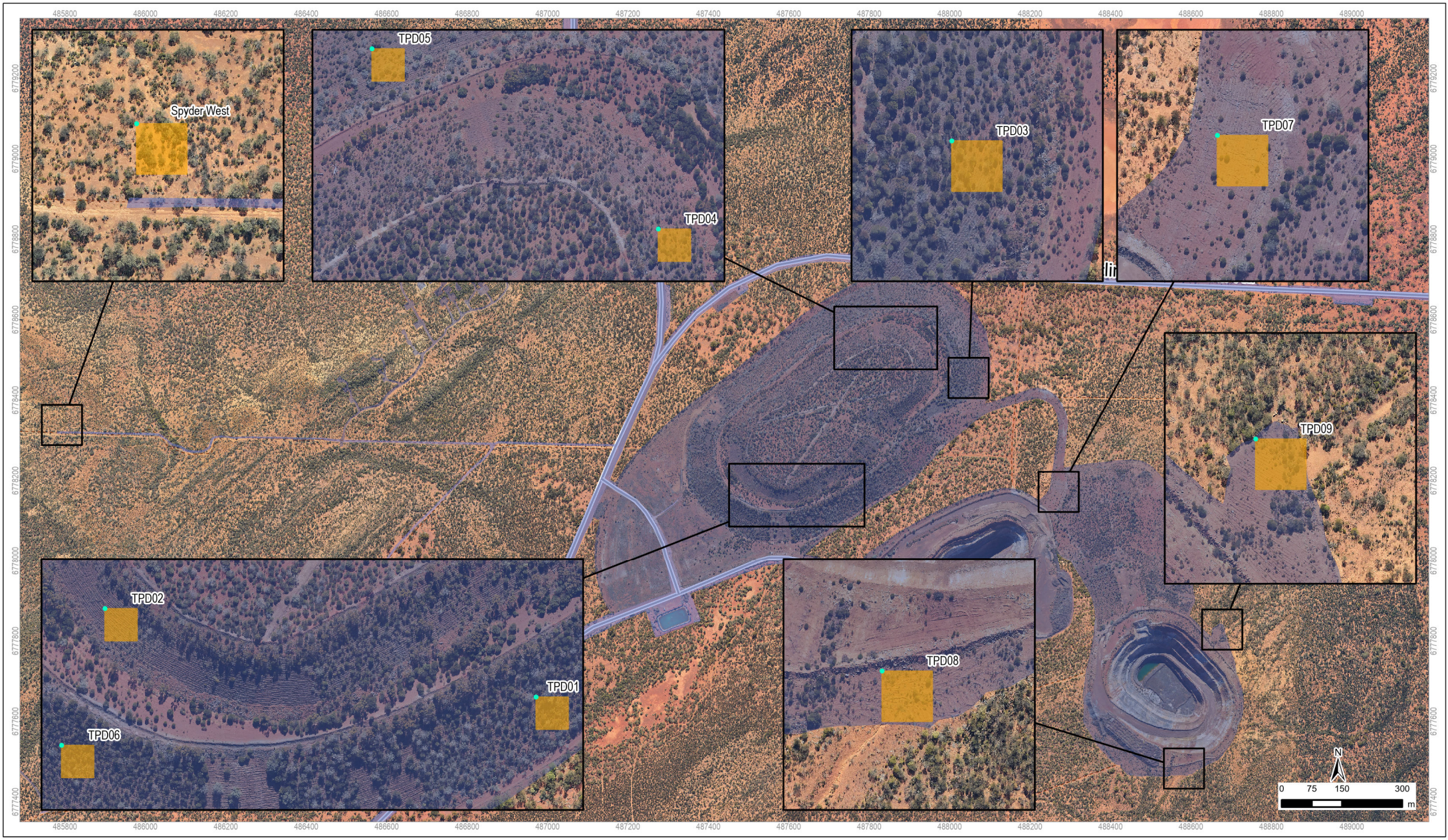


- | | | |
|--|--|--|
| ● Rehabilitation Monitoring Photo | KML Rehabilitation | Minor |
| Rehabilitation Monitoring Quadrats | Railway (Freight) | Highway |
| KML Open Ground Disturbance | Roads Regional | Track |
| | Main | |



Ref: K0170 F14 Proj: GDA94 MGAZ50
 Version: A Scale: 1:7,500
 1 August 2024 Size: A4

Figure 20: Rehabilitation monitoring quadrats at Terapod Waste Rock Dump



MS Annual Compliance Report (2024)

Rehabilitation Health Monitoring Quadrats at Terapod

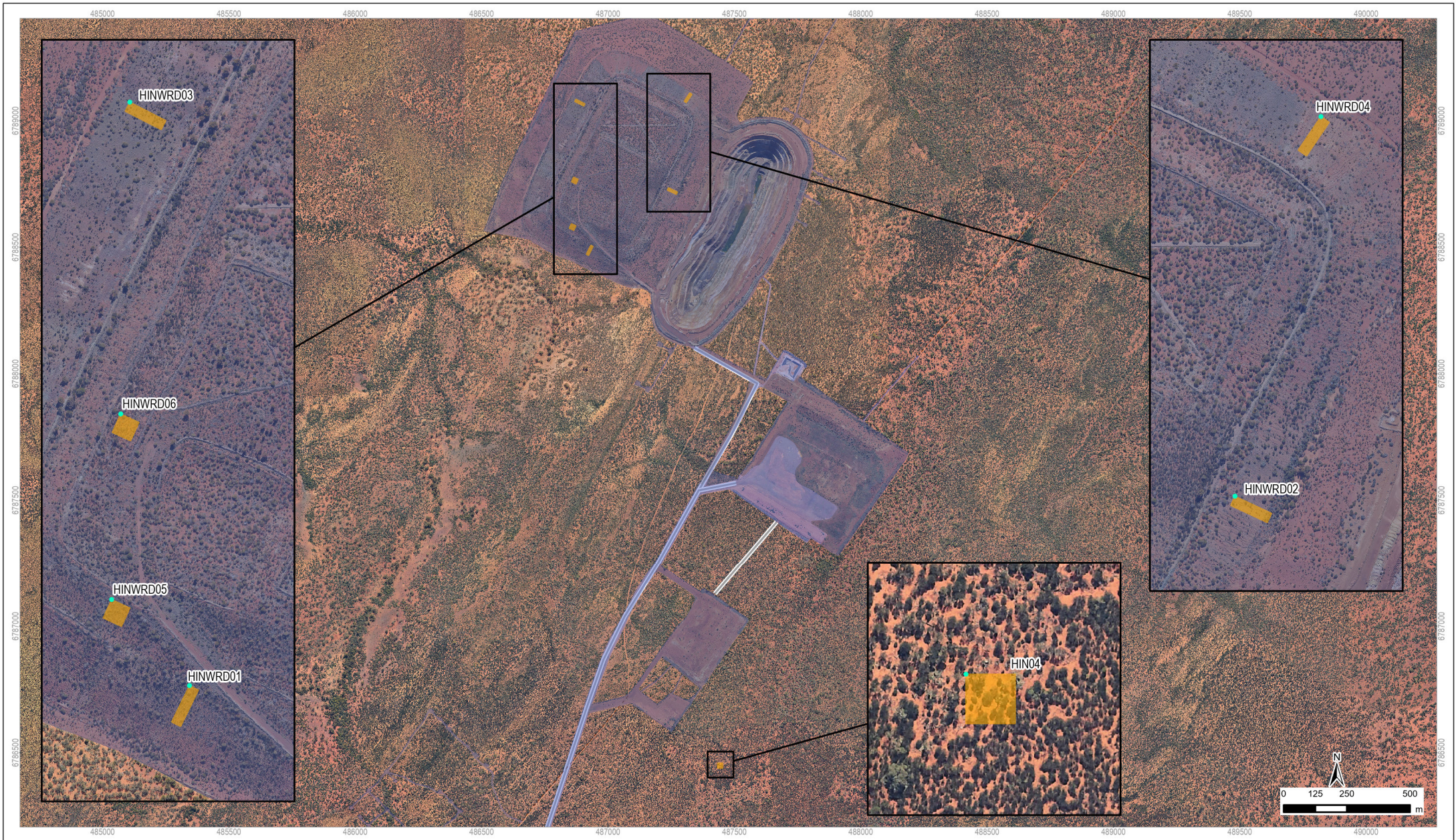


- Rehabilitation Monitoring Photo
- Rehabilitation Monitoring Quadrats
- Railway (Freight)
- Roads Regional
- Main
- Minor
- Highway
- Track
- KML Open Ground Disturbance
- KML Open Ground Disturbance
- KML Rehabilitation



Ref: K0170 F15 Proj: GDA94 MGAZ50
 Version: A Scale: 1:12,500
 1 August 2024 Size: A4

Figure 21: Rehabilitation monitoring quadrats at Hinge Waste Rock Dump



MS Annual Compliance Report
(2024)

Rehabilitation Health
Monitoring Quadrats at Hinge

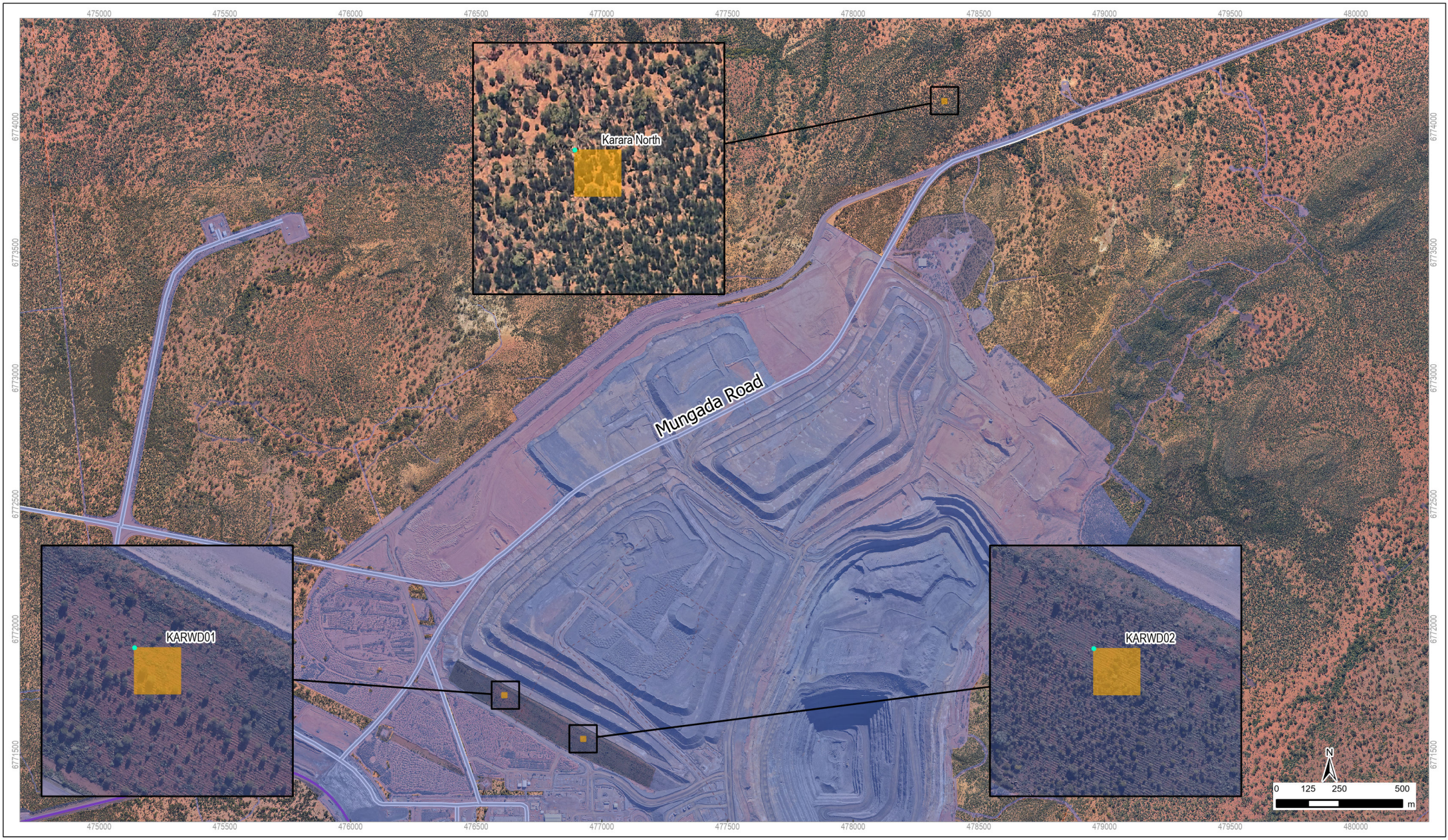


- Rehabilitation Monitoring Photo
- Rehabilitation Monitoring Quadrats
- Railway (Freight)
- Highway
- Roads Regional
- Main
- Minor
- Highway
- Track
- KML Open Ground Disturbance
- KML Open Ground Disturbance
- KML Rehabilitation



Ref: K0170 F16 Proj: GDA94 MGAZ50
Version: A Scale: 1:20,000
1 August 2024 Size: A4

Figure 22: Rehabilitation monitoring quadrats at Karara Waste Rock Dump



MS Annual Compliance Report
(2024)
Rehabilitation Health
Monitoring Quadrats at Karara



- Rehabilitation Monitoring Photo
- Rehabilitation Monitoring Quadrats
- Railway (Freight)
- Highway
- Roads Regional
- Main
- Minor
- Highway
- Track
- KML Open Ground Disturbance
- KML Open Ground Disturbance
- KML Rehabilitation



Ref: K0170 F17 Proj: GDA94 MGAZ50
Version: A Scale: 1:20,000
1 August 2024 Size: A4

Figure 23: Rehabilitation Monitoring Quadrats at Pipeline



MS Annual Compliance Report (2024)

Rehabilitation Health Monitoring Quadrats at Pipeline



- Rehabilitation Monitoring Photo
- Rehabilitation Monitoring Quadrats
- Railway (Freight)
- Roads Regional
- Main
- Minor
- Highway
- Track
- KML Open Ground Disturbance
- KML Open Ground Disturbance
- KML Rehabilitation



Ref: K0170 F18 Proj: GDA94 MGAZ50
 Version: A Scale: 1:120,000
 1 August 2024 Size: A4

6.5.2 Analogue sites

Fifteen analogue quadrats were originally installed adjacent to rehabilitation areas, in vegetation undisturbed by mining activities. Analogue sites are selected according to the Rehabilitation Performance Monitoring Procedure CORP-EN-PRO-1040, at sites with comparable slope, aspect, soil type, resource regulation and vegetation community to the rehabilitation site. Species diversity varies considerably between the analogue quadrats (Figure 24 and Figure 25). Four rail analogue quadrats (RAIL01C, RAIL02C, RAIL03C and RAIL04C) in the vicinity of the rail loop were removed in 2019 following approval of KML Environmental Management Plan – Flora and Vegetation Health Monitoring Plan CORP-EN-PLN-1012 (Rev 4) by DWER in 2019. The Windanning quadrat was also removed in 2019 and replaced with the Spyder West quadrat. There has been no change to the analogue quadrats during this reporting period. Species diversity values in the following sections are all presented relative to the associated analogue site.

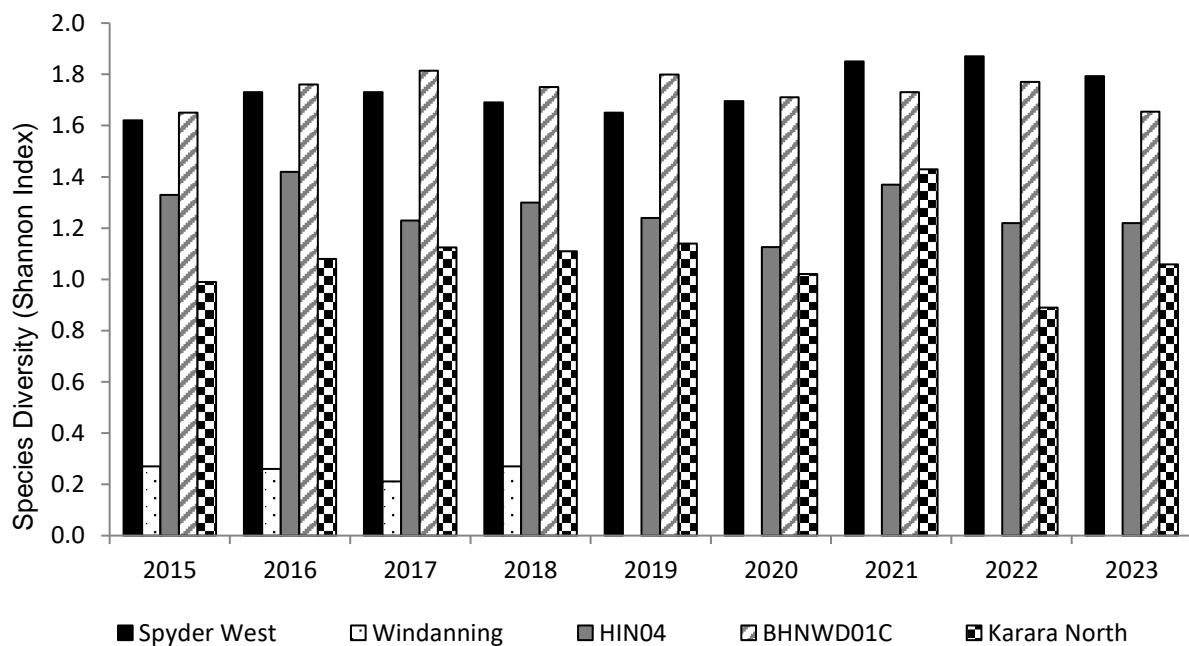


Figure 24: Species diversity (Shannon Index) recorded at analogue quadrats surrounding the Waste Rock Dumps

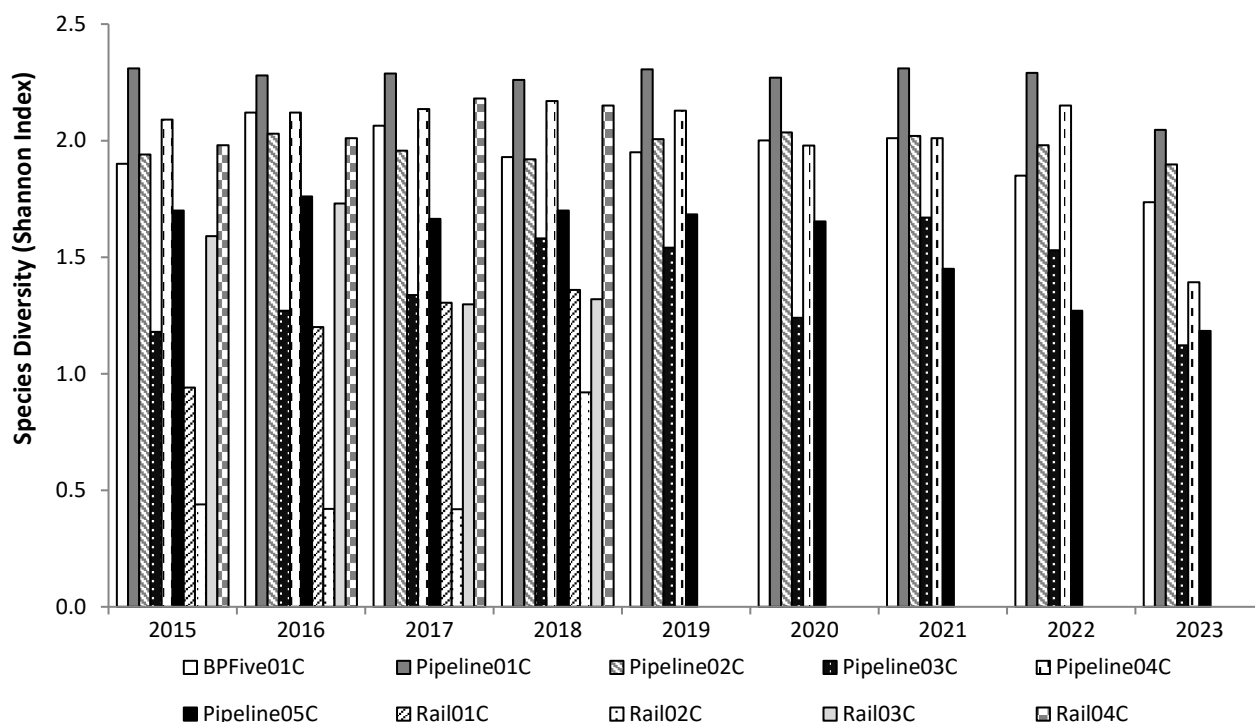


Figure 25: Species diversity (Shannon Index) recorded at analogue quadrats surrounding the Linear Infrastructure Corridor

6.5.3 Blue Hills Waste Rock Dump Rehabilitation

A trial rehabilitation slope was established in early 2013 with a single monitoring (BHNWD01) and analogue site (BHNWD01C) established in March 2013. Blue Hills North WRD rehabilitation works were completed in May 2014, with three additional rehabilitation quadrats established in September 2014. Vegetation has established well since initial rehabilitation, with the soil surface stabilising as rip lines settle (Plate 1). The September 2023 monitoring identified a maximum of 20 (BHNWD05) to a minimum of 14 (BHNWD01) species from the four sampled rehabilitation quadrats at Blue Hills North WRD. Blue Hills North WRD has been assessed against the BHNWD01C analogue quadrat, located approximately 0.3km to the southeast of Blue Hills WRD where 16 species were identified on the analogue site.

During the reporting period, three of the four Blue Hills sites exceeded the 70% target, with the only exception being BHNWD01 (53.07%), which has been recorded continuously below the target since 2019 (Figure 26). The relative species diversity value (relative to the diversity index of the analogue site) recorded within the BHNWD01 quadrat has been falling from 125% in 2018 to below the 70% target in the last five years. During the reporting period the diversity index recorded at this quadrat has slightly decreased from 0.99 in 2022 to 0.87 in 2023. Fourteen (14) species were recorded at BHNWD01 in 2023, which correspond to the 85% of

the species number (16 species) recorded at the analogue site (BHNWD01C). The decrease in the diversity Shannon index at BHNWD01 could be potentially associated with a significant increase in abundance of one species in particular (*Maireana trichoptera*) as 116 individuals were recorded in 2022, while that 409 individuals were recorded in 2023, this quadrat also recorded higher death rates of *Acacia ramulosa* species and some non-chenopod shrubs. It should be noted that the Shannon diversity index measures not only the species diversity, but also the evenness in the number of individuals from different species across the quadrat. The diversity index at BHNWD03 has slightly decreased in comparison to last year's value, which is a result of reduced number of *Acacia obtecta* species from 24 individuals in 2022 to 5 individuals in 2023 (Figure 26) and high recorded deaths of *Acacia anthochaera* species. Shannon Diversity Index at BHNWD04 and BHNWD05 quadrats have slightly incremented compared to last year's value.

It should be noted that although the species diversity recorded at BHNWD01 is still below the target of 70%, an average species density of 89% for all Blue Hill North WRD rehabilitation quadrats was achieved across ten years of monitoring.

Two weed species were recorded at BHNWD01 [*Limonium lobatum* (*statice*) and *Rumex vesicarius*], three weed species were recorded at BHNWD04 (*Mesembryanthemum nodiflorum*, *Spergula pentandra* and *Taraxacum khatoonae*). No weed species recorded at either BHNWD03 or BHNWD05 quadrats. Weed coverage was described as being nil (<1%) at BHNWD01, BHNWD03, BHNWD04 and BHNWD05. These weeds will continue to be managed by KML environmental department as part of ongoing weed management practices.



Plate 1: Blue Hills North WRD monitoring site 3 - September 2023 (Left); September 2018 (Right)

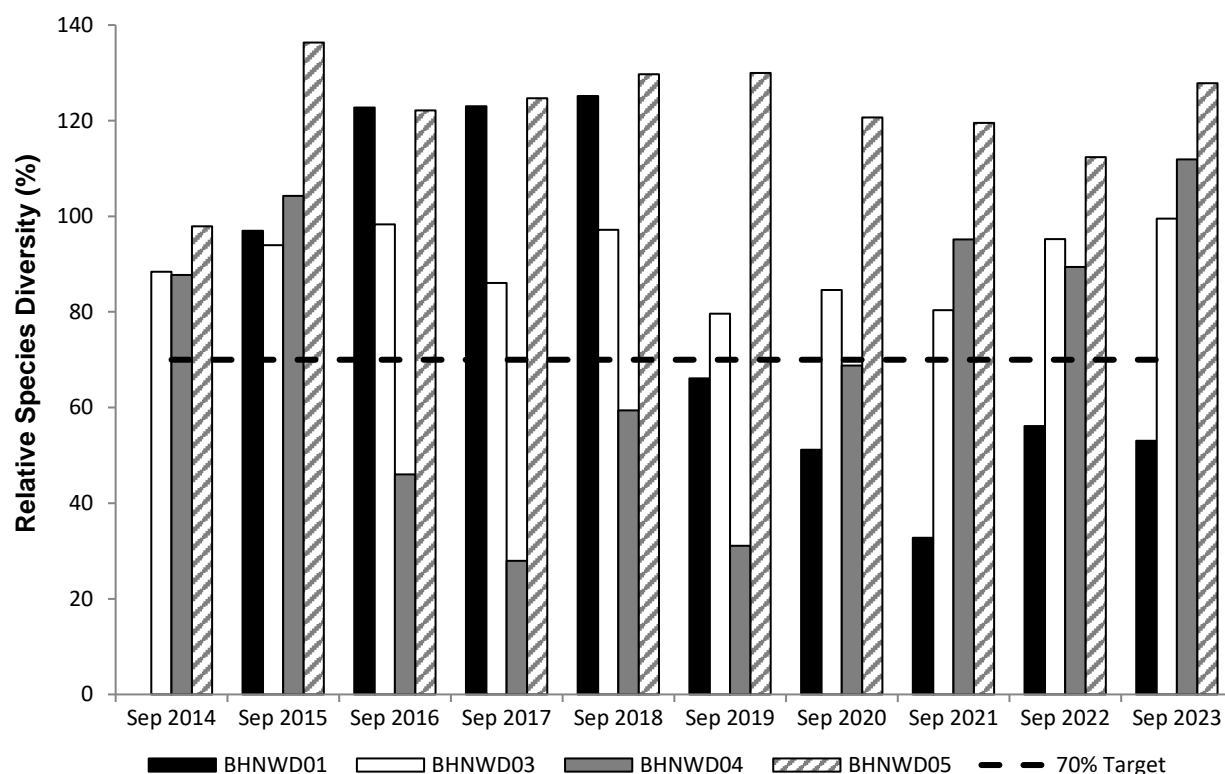


Figure 26: Species diversity recorded at the Blue Hills North rehabilitation monitoring (BHNWD01, 3-5) quadrats, relative to the analogue (BHNWD01C)

6.5.4 Terapod Waste Rock Dump Rehabilitation

Rehabilitation works on the Terapod WRD were completed in April 2014. Seven rehabilitation quadrats were established in September 2014, with additional quadrats established in March and September 2015 respectively, for a total of nine quadrats. Terapod WRD has been assessed against the Spyder West analogue quadrat, located approximately 1.5km to the west of Terapod. Overall, vegetation has established well since initial rehabilitation, with the soil surface stabilising as rip lines have flattened (Plate 2).

During the reporting period all rehabilitation quadrats at Terapod WRD met the species diversity target of 70%, with diversity stable and comparable to the previous two monitoring periods (Figure 27). From the nine sampled quadrats at Terapod WRD, 53 perennial plant species were identified. A total of eleven perennial species were also identified at the analogue site, Spyder West, and of these four were identified over the nine rehabilitation transects.



Plate 2: Terapod WRD monitoring site 4 - September 2023 (Left); September 2018 (Right)

Weed coverage at Terapod WRD was described as nil (<1%) at all the rehabilitation quadrats. Only one weed species was identified during the monitoring period: *Spergula pentandra* (TPD05). The weeds will continue to be monitored and managed.

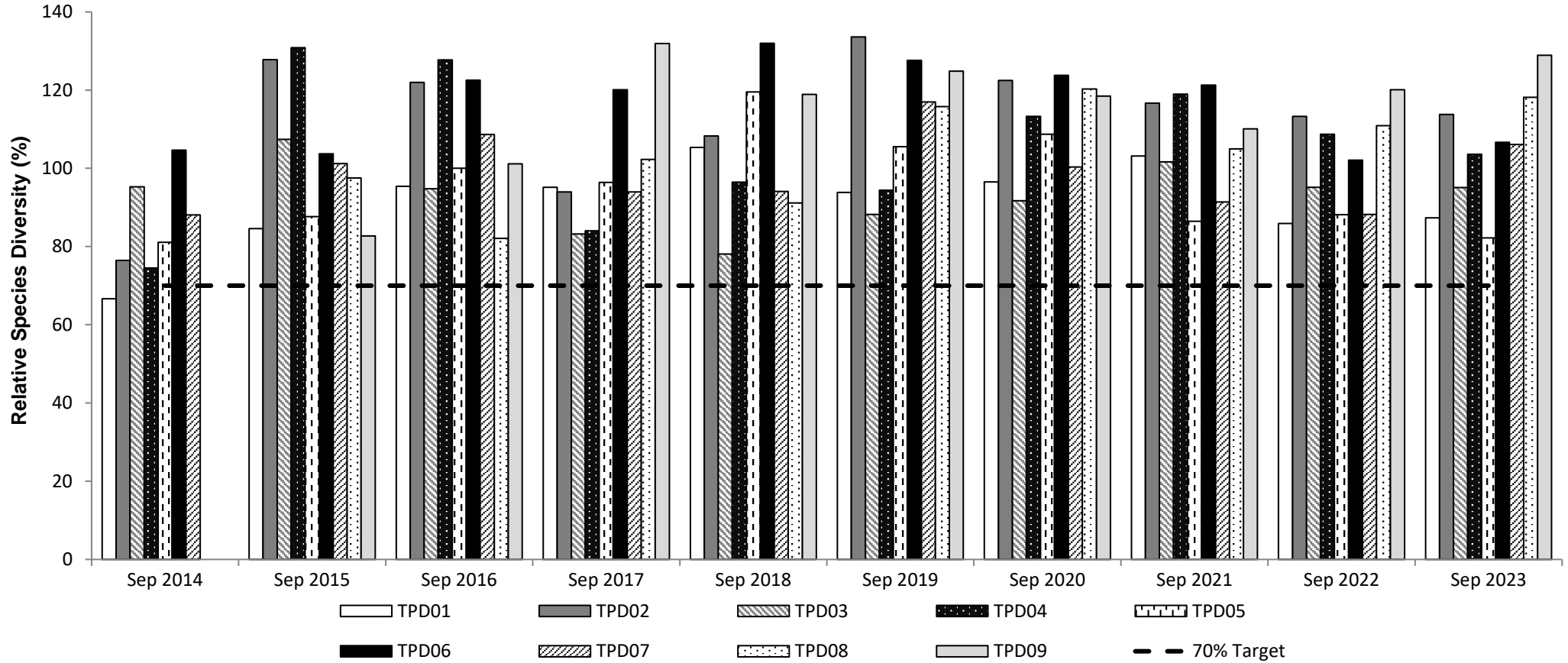


Figure 27: Species diversity recorded at the Terapod rehabilitation monitoring (TPD01-09) quadrats, relative to the analogue (Spyder West).

6.5.5 Hinge Waste Rock Dump Rehabilitation

Rehabilitation works on the Hinge WRD were completed in March 2016, with four monitoring sites established in March 2016 and two additional sites established in September 2016. The six rehabilitation quadrats (HINWRD01 to 06) and one analogue site (HIN04), which are located approximately 2km south of Hinge WRD have been surveyed annually since September 2016. Vegetation has established well, with the soil surface stabilising as rip lines have settled (Plate 3).



Plate 3: Hinge WRD monitoring site 6 - September 2023 (Left); September 2018 (Right)

Rehabilitation at Hinge WRD is tracking well, with species diversity being generally consistent with 2020 levels and exceeding 70% target at most quadrats except at HINWRD03. The relative species diversity at HINWRD03 has increased from 24.2% in 2022 to 49.7% in 2023 (Figure 28). Similar to BHNWD01, the continuous relative species diversity below 70% target at HINWRD03 since 2020 was due to the over-abundance of one species in particular (*Atriplex holocarpa*) which recorded 1651 individuals in 2023 compared to 600 recorded in 2021. This has caused the Shannon diversity index value to drop at HINWRD03 as the evenness of the species is reduced significantly, while the number of species at this site has increased from 14 in 2020 to 16 in 2023.

From the six sampled quadrats at Hinge WRD, 49 perennial plants were identified. Of the six perennial species identified at the analogue site (HIN04), three species were also recorded at Hinge WRD rehabilitation quadrats.

Weed coverage at most rehabilitation monitoring quadrats has remained either low (2-15%) or decreased since last monitoring round. The weed coverage recorded at HINWRD01 has decreased from high (30-60%) to low (2-15%), while the weed coverage recorded at HINWRD05 has also decreased from high (30-60%) to moderate (15-30%). Four weed

species were identified, *Rumex vesicarius* (HINWRD06), *Taraxacum khatoonae* (HINWRD01 and HINWRD02), *Mesembryanthemum nodiflorum* (HINWRD05) and *Spergula pentandra* (HINWRD02, HINWRD03, HINWRD04, HINWRD05 and HINWRD06). Weed management has been ongoing at these areas and will continue while the perennial vegetation continues to establish.

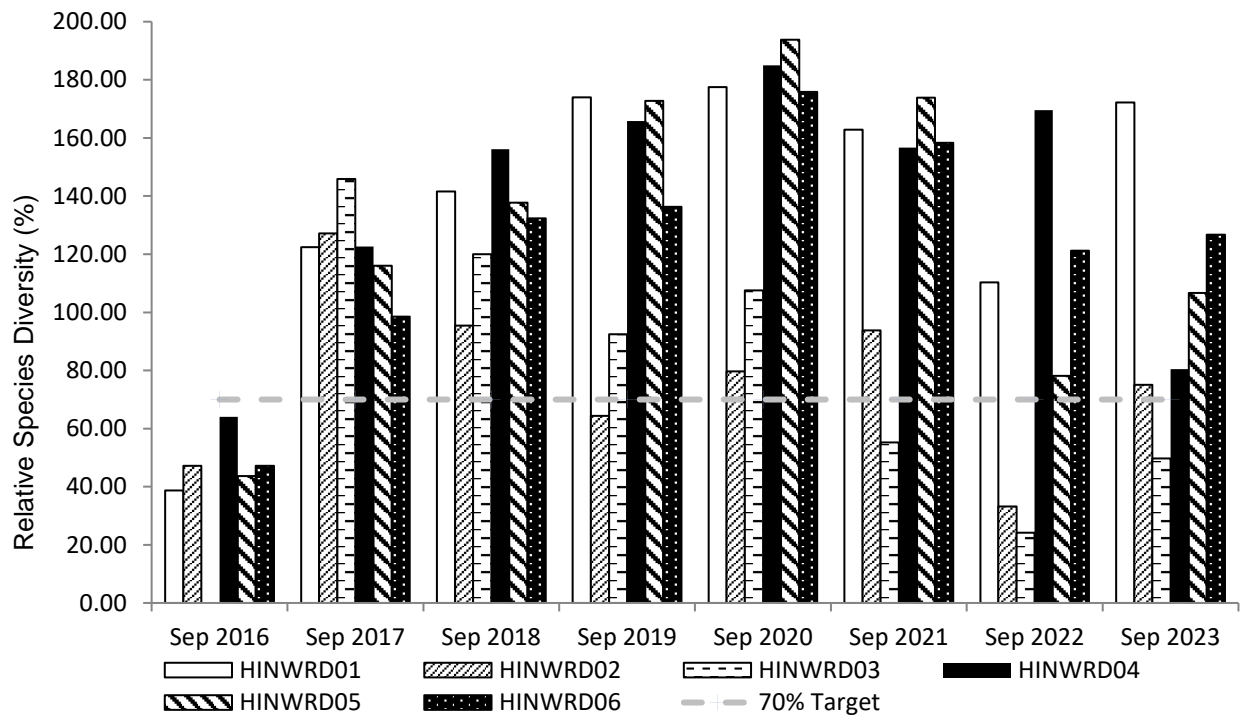


Figure 28: Species diversity recorded at the Hinge rehabilitation monitoring (HIN01-06) quadrats, relative to the analogue (HIN04)

6.5.6 Karara Waste Rock Dump Rehabilitation

Available sections of the Karara WRD have been progressively rehabilitated in 2013, 2015, and 2017. One monitoring quadrat (KARWD01) was established in August 2013 and a second quadrat (KARWD02) was established in August 2015 (Plate 4). One analogue quadrat was established in March 2015 (Karara North), located approximately 1.5 km to the north-northeast of the Karara WRD.



Plate 4: Karara WRD monitoring point 2 - September 2023 (Left); September 2018 (Right)

During the reporting period, relative species diversity recorded at KARWD02 remained at a high level of 206.2% since 2015 monitoring, while KARWD01 quadrat continued to decrease in the relative species diversity index from 21.6% in 2022 to 15.4% in 2023 (Figure 29), which was largely caused by over-abundance of one species (*Atriplex codonocarpa*), being recorded 1705 individuals in 2023 compared to 28 individuals recorded in 2021.

From the two quadrats at Karara WRD, the September 2024 monitoring identified 26 perennial species native to the surrounding area. One of the five perennial species identified at the analogue site (Karara North), were also identified at KARWD02.

Weed coverage has decreased at both rehabilitation monitoring quadrats since last monitoring period. It has decreased from moderate (15-30%) to low (2-15%) at KARWD01 and from low (2-15%) to nil (<1%) at KARWD02. *Mesembryanthemum nodiflorum*, *Rumex vesicarius*, *Spergula pentandra* and *Taraxacum khatoonae* were recorded at both KARWD01 and *Spergula pentandra*, *Waitzia acuminata* and *Phalaris minor* were recorded at KARWD02. These weeds will continue to be managed.

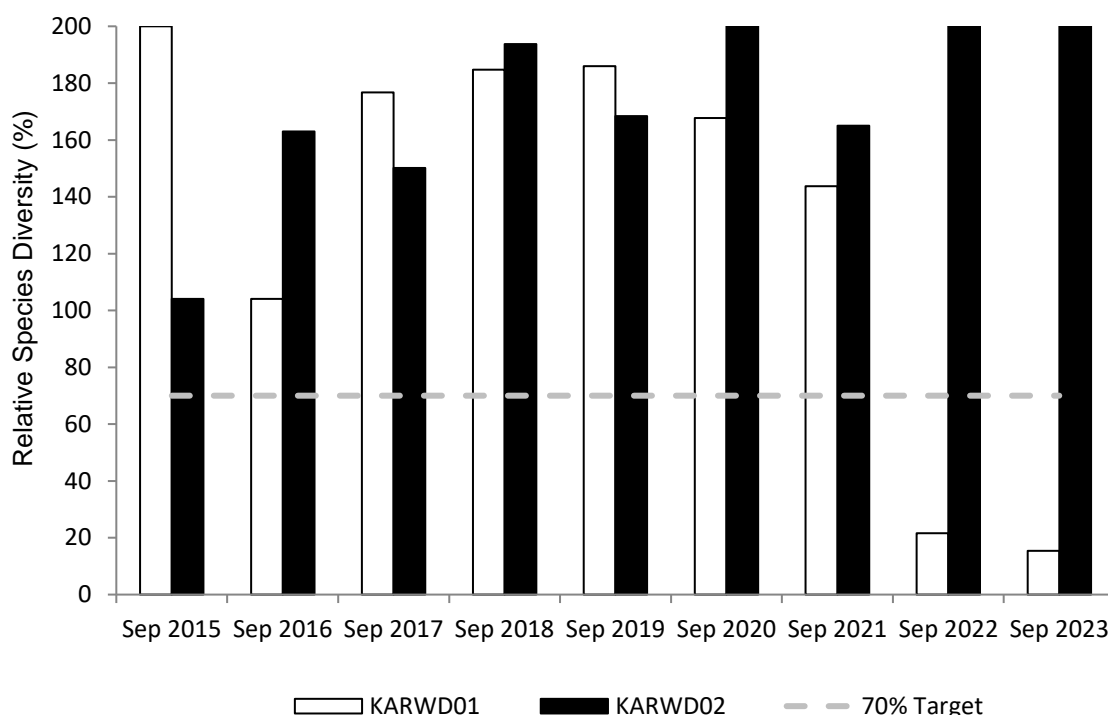


Figure 29: Species diversity recorded at the Karara rehabilitation monitoring (KAR01-02) quadrats, relative to the analogue (Karara North)

6.5.7 Linear Infrastructure Rehabilitation

Rehabilitation works on the linear infrastructure including pipeline, rail and power line were completed in 2012 with six monthly rehabilitation monitoring at three power line quadrats (Power 01-03) commencing in March 2013. All power line monitoring quadrats (Power 01-03) and associated analogue quadrats (Power 01C-03C) were removed in 2016. Monitoring has been undertaken at pipeline and rail sites annually since September 2016. Four rail monitoring quadrats (Rail 01-04) and associated analogue quadrats (Rail 01C-04C) in the vicinity of the rail loop was removed in 2019 monitoring following approval of KML Environmental Management Plan – Flora and Vegetation Health Monitoring Plan CORP-EN-PLN-1012 (Rev 4) by DWER in 2019. Five pipeline quadrats (Pipeline 01-05) were monitored during the reporting period. Each of the five pipeline quadrats have an associated analogue quadrat (Pipeline 01C-05C) established in adjacent undisturbed vegetation (Figure 30).

For the pipeline rehabilitation area, the September 2023 monitoring identified 44 perennial species over the five rehabilitation quadrats and 46 on the five analogue quadrats. Of the 46 perennial species identified on the analogue quadrats, 25 were also identified within the rehabilitation quadrats.

Whilst not all species present in the rehabilitation quadrats were identical to the analogues, all species identified were of local provenance.

All five pipeline rehabilitation quadrats meet the 70% species diversity target, except Pipeline03 (Figure 30). The relative species diversity index at Pipeline03 has been slightly decreased from 71.3% in 2022 to 66.4% in 2023, which is slightly below the target.

In the 2023 monitoring period, weed coverage percentage recorded at all the monitoring sites was less than 1%. Two weed species (*Mesembryanthemum nodiflorum* and *Taraxacum khatoonae*) were identified at Pipeline03. No weed species were recorded at analogue sites.

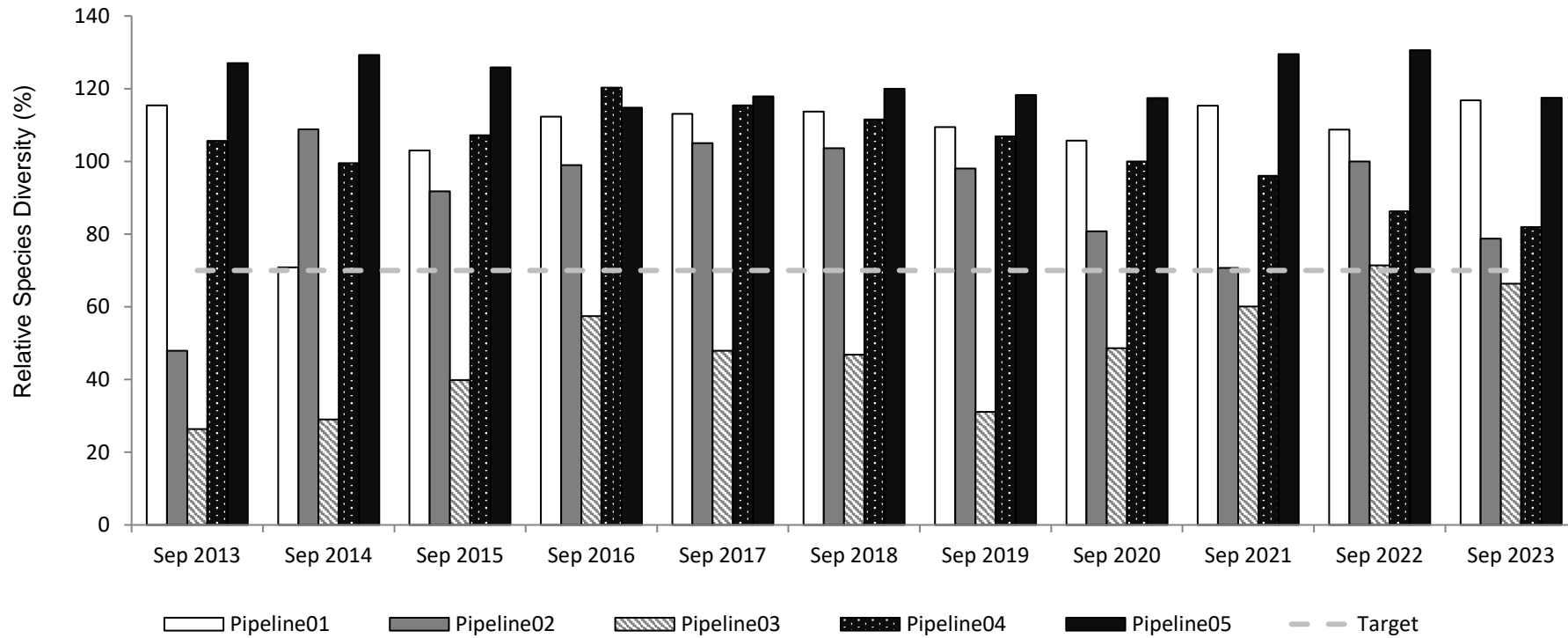


Figure 30: Species diversity recorded at the pipeline rehabilitation quadrats (Pipeline 01-05), relative to the associated analogues (Pipeline 01C-05C)

6.5.8 Seed Collection

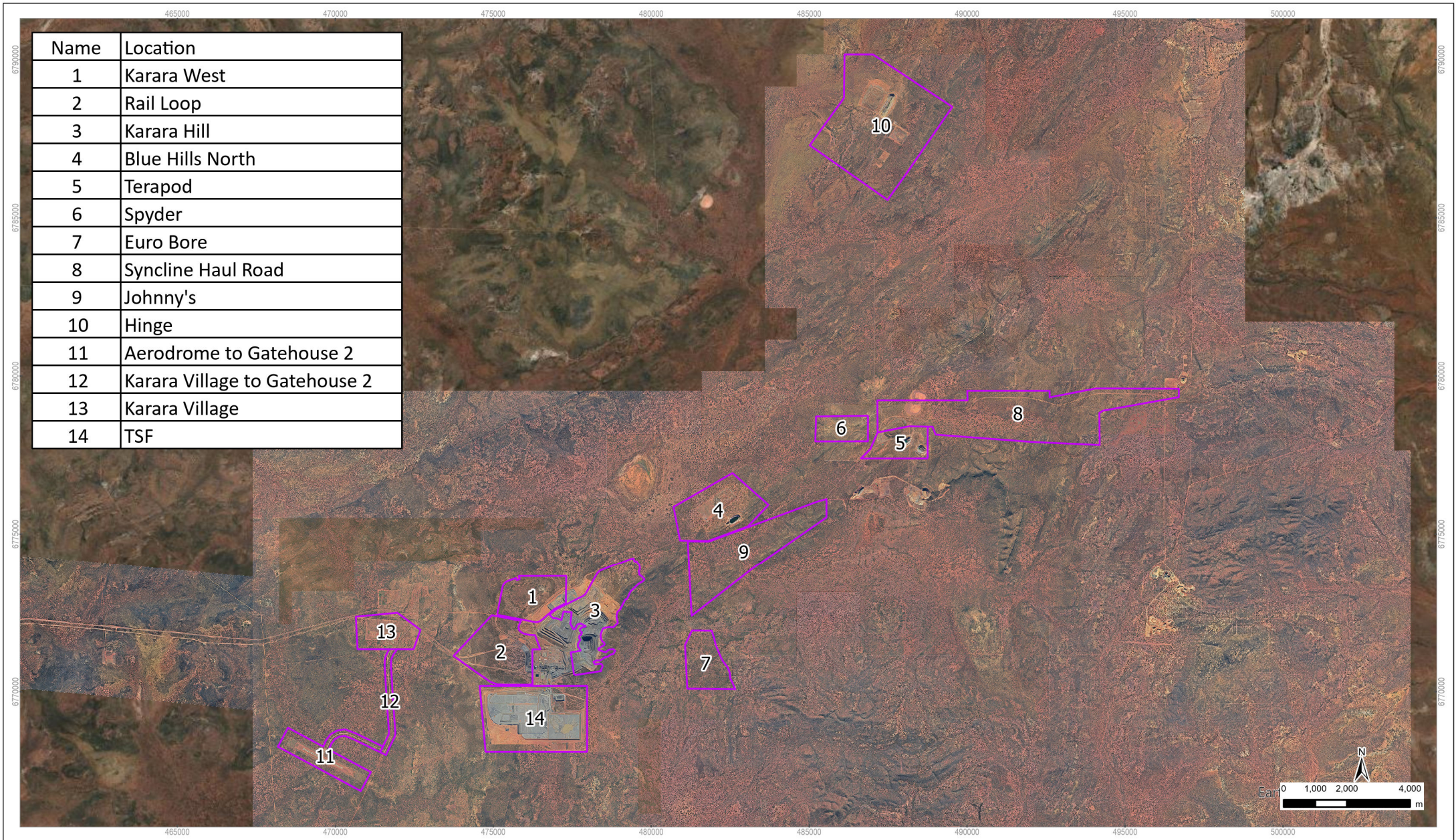
Direct seeding and planting of tube stock is undertaken to help achieve KML's rehabilitation goal of establishing self-sustaining vegetation communities that are reflective of the surrounding environment. All seed is collected under a valid licence in accordance with the *Biodiversity Conservation Regulations 2018*. Fourteen seed collection zones¹ have been established within the permitted seed collection area (Figure 31).

During the reporting period approximately 0.36kg of seed of one species (*Brachychiton gregorii*), was collected at the Terapod zone. The collected seed is cleaned, dried and placed in a sealed refrigerated container for later use on rehabilitated areas and in research trials. KML maintains a 'Seed Inventory' of all seed stored onsite to track the quantity and species availability for future rehabilitation programs.

No incidents in relation to seed collection or nursery propagation occurred during the reporting period.

¹ Mungada Ridge seed collection zone was discarded following surrender of M59/650 in August 2021.


Figure 31: Seed collection areas within the Project



Name	Location
1	Karara West
2	Rail Loop
3	Karara Hill
4	Blue Hills North
5	Terapod
6	Spyder
7	Euro Bore
8	Syncline Haul Road
9	Johnny's
10	Hinge
11	Aerodrome to Gatehouse 2
12	Karara Village to Gatehouse 2
13	Karara Village
14	TSF

MS Annual Compliance Report
(2024)

Seed Collection Zones

 Native Seed Collection Area



Ref: K0170 F19 Proj: GDA94 MGAZ50
 Version: A Scale: 1:160,000
 1 August 2024 Size: A4

7 CONCLUSION

KML has maintained a high level of compliance with MS805, MS806 and MS968 during the reporting period. Five minor non-compliances were reported associated with monitoring of Shield-backed Trapdoor Spiders (*Idiosoma nigrum*) at KIOP (MS805). The spider monitoring discontinued after re-classification of the species, but without formal confirmation of removal of Condition 9 of MS805: Spider monitoring being received from DWER. DWER-EPAS advised on 13 June 2023 that the EPA's inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and DWER-EPAS expects staging of progression on the s46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the KIOP MLE Proposal, which is currently being formally assessed by the EPA. DWER-EPAS provided no updates on the progress on the removal of Condition 9 of MS805: Spider monitoring during this reporting period.

Two minor non-compliance was also recorded with respect to rehabilitation of the MIOP area (MS806) to meet the 70% species composition within five years following cessation of productive mining. DWER-EPAS identified this was an ongoing non-compliance following their compliance audit on MS806 in 2021. The KIOP MLE Proposal, which incorporates the entire footprint previously approved under MIOP (MS806) (except those areas within the tenements that are no longer held by KML) was continued to be formally assessed by the DWER-EPAS under Part IV of the EP Act during this reporting period. It is expected that the approval of the Proposal will resolve this ongoing non-compliance with MS806 Condition 11.1.1a in relation to meeting the 70% species composition within five years following cessation of productive mining at MIOP and those MIOP areas will be used for the KIOP mine life operations.

Monitoring results continue to demonstrate that KML is effectively managing potential impacts to flora and fauna. Fauna monitoring results have consistently demonstrated that mining and associated activities have not significantly impacted conservation significant fauna populations, particularly with respect to the Malleefowl, and WStS. Monitoring of vegetation health also demonstrates that the Blue Hills PEC has not been adversely impacted by KML operations.

Ongoing rehabilitation monitoring also demonstrates that rehabilitation of disturbed areas is still progressing in a positive trajectory and is on track to meet closure objectives. The 70% species composition target has not been met at three WRD rehabilitation monitoring quadrats (e.g. BHNWRD01, HINWRD02 and KARWD01) during the reporting period. This was mainly due to the over-abundance of three species in particular (*Atriplex codonocarpa*, *Atriplex holocarpa* and *Maireana trichoptera*) being recorded hundreds/thousands of individuals at these three sites which caused the Shannon diversity index to drop as the evenness of the

species is reduced significantly. The three over-abundant species are native colonisers, which have flourished and filled in the space where the shrub cover is predominantly sparse. These species are beneficial perennials species with a medium lifespan which play a key role in inhibiting weed growth. Overall, the number of the species at these three sites either remains stable or has decreased due to the over-abundance of above individual species, which are however, consistent with the number of the species recorded at respective analogue sites during this monitoring period.

8 REFERENCES

Bamford, 2019. Karara Iron Ore Project: Annual Monitoring of the Northern Shield-backed Trapdoor Spider 2010 to 2019. Unpublished report prepared for Karara Mining Limited, October 2019.

Commonwealth of Australia, 2011. Survey Guidelines for Australia's Threatened Reptiles. Department of Sustainability, Environment, Water, Populations and Communities.

Gagnon, M.M., & Bateman, P.W. (2022). Evaluating Threats, Recovery Strategies and Managing Stress Levels of EPBC Listed Fauna (Western Spiny-tailed Skink [*Egernia stokesii badia*] and the Malleefowl [*Leipoa ocellata*]) Associated with Mining Activities. Curtin University, 2021. Published report prepared for Karara Mining Limited.

National Malleefowl Recovery Team, 2016. National Manual for the Malleefowl Monitoring System: Edition 2016-1.

APPENDIX A: KML ENVIRONMENT POLICY (January 2023)



The Environment Policy

At Karara, we place a premium value on the environmental values of the mid-west region where we operate. To protect and enhance the environment and to eliminate or reduce any potential adverse impacts, we:

- Assess and prioritise environmental matters associated with our activities.
- Commit to protecting the environment, through:
 - The prevention or minimisation of pollution from our operations;
 - Incorporating environmental considerations into our work task planning;
 - Progressively rehabilitating areas impacted by our operations and activities; and
 - Implementing programs to proactively manage regional biodiversity.
- Never compromise on our environmental standards and obligations.
- Engage local community and communicate openly with all our stakeholders on environmental matters.
- Partner with agencies to support research to understand the local environment.
- Set environmental objectives and targets and measure progress towards them to drive continuous improvement.
- Apply, maintain and continually improve an effective environmental management system to maintain compliance with our obligations and achieve excellent environmental outcomes.
- Meet the legal requirements and regulatory obligations that apply to our business activities.
- Demonstrate innovation in environmental management and strive to go beyond regulatory requirements.

Mr Changjiang Zhu
Chief Executive Officer 

January 2023

APPENDIX B: MS805 STATEMENTS OF COMPLIANCE AND AUDIT TABLE

Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	KARARA IRON ORE PROJECT, 215 KILOMETRES EAST-SOUTHEAST OF GERALDTON AND 320 KILOMETRES NORTH-NORTHEAST OF PERTH, SHIRE OF PERENJORI
Statement Number	805
Proponent Name	Karara Mining Limited
Proponent's Australian Company Number <i>(where relevant)</i>	ACN 070 871 831

2. Statement of Compliance Details

Reporting Period	1/07/23 to 30/06/24
------------------	---------------------

Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input type="checkbox"/>	Construction	<input type="checkbox"/>	Operation	<input checked="" type="checkbox"/>	Decommissioning	<input type="checkbox"/>

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	2
<p>An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table must be prepared and maintained in accordance with the Department of Water and Environmental Regulation (DWER) <i>Post Assessment Guideline for Preparing an Audit Table</i>, as amended from time to time. The 'Status Column' of the audit table must accurately describe the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms that may be used by the proponent in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.</p>	

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)			
No (please proceed to Section 3)	<input checked="" type="checkbox"/>	Yes (please proceed to Section 4)	<input type="checkbox"/>

3. Details of Non-compliance(s) and/or Potential Non-compliance(s)

The information required Section 3 must be provided for each non-compliance or potential non-compliance identified during the reporting period covered by this Statement of Compliance.

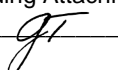
Non-compliance/potential non-compliance 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?
MS805 Condition 9.2 (1-2) MS805 Condition 9.3 (1-3) MS805 Condition 9.4 MS805 Condition 9.5
Was the implementation condition or procedure non-compliant or potentially non-compliant?
Minor Non-compliance
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?
It was identified during the 2023/2024 audit that the above Conditions has not been met. As such, Condition 4.5 associated with non-compliance reporting has also been recorded as a non-compliance.

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally Date _____ <input type="checkbox"/> Reported to DWER in writing Date _____	<input checked="" type="checkbox"/> No

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?
<ul style="list-style-type: none"> Condition 9.2(1-2) requires demonstration that the persistence of the population of <i>Idiosoma nigrum</i> in the Blue Hills area will not be impacted as a result of the proposal, improve knowledge of the ecology and impacts of the proposal on <i>Idiosoma nigrum</i>. Condition 9.3(1-3) requires implementation of spider monitoring procedures identifying the number, size and area(s) inhabited by spiders, number, size and distribution of burrows, number of burrows occupied by spiders. Condition 9.4 requires the results of the monitoring program to be submitted to the DWER. Condition 9.5 requires that if Condition 9.2(1) cannot be met, the development and implementation of management and contingency actions to the satisfaction of the CEO. <p>Following taxonomic review by the Western Australian Museum, it has been identified that the species of <i>Idiosoma</i> associated with the Karara and Mungada Iron Ore projects is not <i>Idiosoma Nigrum</i> (Endangered), but the common <i>Idiosoma clypeatum</i> 'MYG018' (P3). KML submitted a letter of request to DWER in July 2018 seeking variation of MS805 through removal of Condition 9: Spider monitoring. Response received from DWER via EP Act s46 form on 13 February 2019 indicated that the Minister requested that the EPA inquire into and report on the removal of Condition 9, as well as the application of offsets to the proposal and whether they should be included as a condition. KML submitted additional offsets related information as requested by the DWER-EPAS for EPA's inquiry into changing the implementation conditions relating to KIOP MS805 pursuant to section 46(1) of the EP Act on 18 May 2022.</p>

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

INITIALS: _GT_ 

The proposed removal of Condition 9 (and its associated sub-condition 9.1 – 9.5) in relation to the spider monitoring program was also included in the referral application for the Karara Iron Ore Project (KIOP) Mine Life Extension (MLE) Proposal (the Proposal) submitted to the DWER-EPAS under s38 of the EP Act on 21 February 2022 and a revised referral application was submitted to the DWER-EPAS under s38C of the EP Act on 30 September 2022. DWER-EPAS accepted the revised referral and decided to assess the Proposal at a level of 'Assess - Referral Information with additional information required under s40(2)(a) and public review s40(5)' pursuant to s38G(1) of the EP Act on 21 June 2023. DWER-EPAS advised on 13 June 2023 that the EPA's inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and DWER-EPAS expects staging of progression on the s46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal. DWER-EPAS continued formal assessment of the Proposal but provided no updates on the progress on the removal of Condition 9 (and its associated sub-condition 9.1 – 9.5): Spider Monitoring during this audit period.

Despite the above, the discontinued monitoring of Shield-backed Trapdoor Spiders during the monitoring period was considered as non-compliance and DWER was not advised of this non-compliance. However, DWER previously advised that KML can discontinue spider monitoring and KML are considered to meet the intention of the MS805 Conditions 9.2(1-2), 9.3(1-3), 9.4 and 9.5 associated with spider monitoring.

What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)

Karara Iron Ore Project

What was the cause(s) of the non-compliance or potential non-compliance?

Following taxonomic review by the Western Australian Museum, it has been identified that the species of *Idiosoma* associated with the Karara and Mungada projects is not *Idiosoma Nigrum* (Endangered), but the common *Idiosoma clypeatum* 'MYG018' (P3). KML submitted a letter of request to DWER in July 2018 seeking variation of MS805 through removal of Condition 9: Spider monitoring. DWER-EPAS has not formally approved the removal of Condition 9 and expects that staging of progression on the s46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal as detailed above.

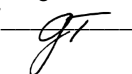
The most recent Shield-backed Trapdoor Spider Monitoring occurred in 2019, with no monitoring occurring in 2020, 2021, 2022 and 2023. The spider monitoring has been discontinued following re-classification of the species. DWER advised in a meeting in September 2021 that KML can discontinue spider monitoring and KML are considered to meet the intention of the MS805 Conditions 9.2(1-2), 9.3(1-3), 9.4 and 9.5 associated with spider monitoring.

What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?

KML submitted a letter of request to DWER in July 2018 seeking variation of MS805 through removal of Condition 9: Spider monitoring. Response received from DWER via EP Act s46 form on 13 February 2019 indicated that the Minister requested that the EPA inquire into and report on the removal of Condition 9, as well as the application of offsets to the proposal and whether they should be included as a condition. KML submitted additional offsets related information for EPA's inquiry into changing the implementation conditions relating to KIOP MS805 pursuant to section 46(1) of the EP Act on 25 May 2022 as per DWER's request on 18 May 2022.

The proposed removal of Condition 9 (and its associated sub-condition 9.1 – 9.5) in relation to the spider monitoring program was also included in the referral application for the Proposal submitted to the DWER-EPAS under s38 of the EP Act on 21 February 2022 and a revised referral application was submitted to the DWER-EPAS under s38C of the EP Act on 30 September 2022. DWER-EPAS

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INITIALS: _GT 

accepted the revised referral and decided to assess the Proposal at a level of 'Assess - Referral Information with additional information required under s40(2)(a) and public review s40(5)' pursuant to s38G(1) of the EP Act on 21 June 2023. DWER-EPAS advised on 13 June 2023 that the EPA's inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and DWER-EPAS expects staging of progression on the s46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal. DWER-EPAS continued formal assessment of the Proposal but provided no updates on the progress on the removal of Condition 9 (and its associated sub-condition 9.1 – 9.5): Spider Monitoring during this audit period.

What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?

KML discussed this non-compliance with DWER in a meeting on 10 September 2021, DWER advised that as KML have evidence that the *Idiosoma nigrum* spider is not present on KML's tenements, KML can discontinue spider monitoring (as there is no need to monitor) and KML are considered to have met the intention of the Condition – meeting notes sighted.

KML discussed this matter with the DWER-EPAS at various occasions in 2022 and 2023 to try to resolve this ongoing non-compliance. Feedback from the DWER-EPAS indicated that the EPA's inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and DWER-EPAS expects staging of progression on the s46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal. DWER-EPAS continued formal assessment of the Proposal but provided no updates on the progress on the removal of Condition 9 (and its associated sub-condition 9.1 – 9.5): Spider Monitoring during this audit period.

KML will continue to follow up with DWER-EPAS for the progression on the s46 inquiry to remove Condition 9 of spider monitoring during the following assessment of the Proposal.

Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:

- in the reporting period addressed in this Statement of Compliance; and
- as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.

(the above information may be provided as an attachment to this Statement of Compliance)

For additional non-compliance or potential non-compliance, please duplicate this page as required.

4. Proponent Declaration

I, Gaomai Trench (General Manager HSEC), (*full name and position title*) declare that I am authorised on behalf of Karara Mining Limited (*being the person responsible for the proposal*) to submit this form and that the information contained in this form is true and not misleading.

Signature: gaomai Trench Date:30/08/2024.....

Please note that:

- it is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give or cause to be given information that to his knowledge is false or misleading in a material particular; and
- the Chief Executive Officer of the DWER has powers under section 47(2) of the *Environmental Protection Act 1986* to require reports and information about implementation of the proposal to which the statement relates and compliance with the implementation conditions.

5. Submission of Statement of Compliance

One hard copy and one electronic copy (preferably PDF on CD or thumb drive) of the Statement of Compliance are required to be submitted to the Chief Executive Officer, DWER, marked to the attention of Manager, Compliance (Ministerial Statements).

Please note, the DWER has adopted a procedure of providing written acknowledgment of receipt of all Statements of Compliance submitted by the proponent, however, the DWER does not approve Statements of Compliance.

6. Contact Information

Queries regarding Statements of Compliance, or other issues of compliance relevant to a Statement may be directed to Compliance (Ministerial Statements), DWER:

Manager, Compliance (Ministerial Statements)

Department of Water and Environmental Regulation

Postal Address: Locked Bag 10
Joondalup DC
WA 6919

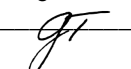
Phone: (08) 6364 7000

Email: compliance@dwer.wa.gov.au

7. Post Assessment Guidelines and Forms

Post assessment documents can be found at www.epa.wa.gov.au

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

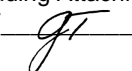
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ATTACHMENT 1

Table 1 Compliance Status Terms

Compliance Status Terms	Abbrev	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: <ul style="list-style-type: none"> ongoing requirements that have been met during the reporting period; and requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: <ul style="list-style-type: none"> audit elements have a finite period of application (e.g. construction activities, development of a document); the action has been satisfactorily completed; and the DWER has provided written acceptance of 'completed' status for the audit element.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	<p>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</p> <p>The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).</p>

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INITIALS: _GT_ 



AUDIT TABLE

PROPOSAL: Karara Iron Ore Project (KIOP)
STATEMENT: 805

Note:

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the Minister's Statement for full detail/precise wording of individual elements.
- Code prefixes: M = Minister's condition, P = Proponent's commitment.
- Acronyms list: CEO = Chief Executive Officer of OEPA; DEC = Department of Environment Regulation; DPAW = Department of Parks and Wildlife; DIA = Department of Indigenous Affairs; DMP = Department of Mining and Petroleum; DWER = Department of Water and Environmental Regulation; EPA = Environmental Protection Authority; DoH = Department of Health; DoW = Department of Water, Minister for Env = Minister for the Environment; OEPA = Office of the Environmental Protection Authority.
- Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non – compliant, NR = Not Required at this stage. Please note the terms VR = Verification Required and IP = In Process are only for OEPA use.

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
805:M1.1	Proposal Implementation	The proponent shall implement the proposal as documented and described in schedule 1 of this statement subject to the conditions and procedures of this statement. In implementing the proposal, the proponent shall not increase the mine pit footprint beyond that delineated by MGA coordinates listed in schedule 2.	Project implemented in accordance with these criteria.	<p>CAP req. Commencement of project works</p> <p>Evidence</p> <ul style="list-style-type: none"> • The following changes of the mine activities for the Dry-stack TSF expansion (Sweeps 11 and 12) in the KIOP Mining Proposal (Rev 5, Reg ID118480) have been approved by DEMIRS on 7 August 2023. <ul style="list-style-type: none"> ○ A change of key mine activity of 260.0000ha from 'tailings or residue storage facility (class 2)' to key mine activity 'tailings or residue storage facility (class 1)'. ○ Minor change of approved 'plant site' (0.0921ha) to 'tailings or residue storage facility (class 1)'. ○ Minor change of approved 'diversion channel or drain' (2.2253ha) to 'tailings or residue storage facility (class 1)'. ○ Change of approved 'transport or service infrastructure corridor' (68.8279ha) to 'tailings or residue storage facility (class 1)'. ○ Change of approved 'borrow pit or shallow surface excavation' (16.9450ha) to 'tailings or residue storage facility (class 1)'. ○ Change of approved 'topsoil stockpile' (36.6463ha) to 'tailings or residue storage facility (class 1)'. ○ Minor change of approved 'land that is cleared of vegetation' (0.200ha) to 'tailings or residue storage facility (class 1)'. • No infrastructure commissioned during the last and current reporting periods that alters the disturbance footprint • Expansion of the waste rock dump (within approved MS 805 disturbance footprint) continued with additional clearing of 23.57ha completed during the current reporting period. • Disturbance footprint within the approved footprint (GIS check) • Total Area of disturbance of mine and linear infrastructure corridor to date (1,655ha) (134.98ha rehabilitated) • Production rate for the current reporting year (6,581,323 dry tonnes concentrate) • Pit dimensions (h, w, depth) within approved description • Waste rock production for the current reporting year (21,484,326 tonnes) • Footprint of waste rock dump (246.32ha) • PAF material of 2,393,555 tonnes mined during reporting period and all contained within isolation cell in waste rock dump. • Dewatering rates less than licensed amount (145,023 ton/year of licenced amount of 573,600 ton/year) 	Overall	Ongoing	C	
805:M2.1		The proponent for the time being nominated by the Minister for Environment under sections 38(6) or 38(7) of the	The project substantially commenced by the proponent in accordance with 805.M3.1	<p>CAP req. Commencement of project works by the proponent</p>	Overall	Approval void 9 September	CLD	



AUDIT TABLE

PROPOSAL: Karara Iron Ore Project (KIOP)
STATEMENT: 805

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
	Proponent Nomination and Contact Details	<i>Environmental Protection Act 1986</i> is responsible for the implementation of the proposal.		Evidence <ul style="list-style-type: none"> The Proposal has been substantially implemented as evidenced by ACARs submitted from 2009 to present - refer to previous ACARs to date for details of Project commencement and implementation. 		2014 if project not substantially commenced		
805:M2.2	Proponent Nomination and Contact Details	The proponent shall notify the CEO of the Department of Environment and Conservation of any change of the name and address of the proponent for the serving of notices or other correspondence within 30 days of such change.	Letter notifying DWER of any change in proponent details.	CAP req. Letter notifying the OEPA of any change in proponent details. Evidence <ul style="list-style-type: none"> The Proponent details are consistent with the company details on the KML website (Karara Mining) (https://www.kararamining.com.au/#) KML notified DWER via email 25/06/2020 of change of address details (change of building floor only). DWER acknowledged change of address details via return email 25/06/2020 – email sighted. 	Overall	Within 30 days of such change	C	
805:M3.1	Time Limit of Authorisation	The authorisation to implement the proposal provided for in this statement shall lapse and be void five years after the date of this statement if the proposal to which this statement relates is not substantially commenced.	Commencement of project works	CAP req. Commencement of project works Evidence Audited as compliant in previous audit period, no further action required	Overall	Approval void 9 September 2014 if project not substantially commenced	CLD	
805:M3.2	Time Limit of Authorisation	The proponent shall provide the CEO with written evidence which demonstrates that the proposal has substantially commenced on or before the expiration of five years from the date of this statement	Letter to DWER which demonstrates that the proposal has substantially commenced.	CAP req. The Compliance Assessment Report shall indicate that the proposal has substantially commenced on or before the expiration of five years from the date of this statement. Evidence Audited as compliant in previous audit period (Copy of audit report in 2020 ACAR), no further action required.	Overall	Provide letter to DWER on or before 9 September 2014	CLD	
805:M4.1	Compliance Reporting	The proponent shall prepare and maintain a CAP to the satisfaction of the CEO.	Prepare a CAP. CAP reviewed and updated as appropriate over the life of the Project	CAP req. <ul style="list-style-type: none"> The preparation of a CAP Advice from OEPA advising that the CAP is satisfactory Evidence <ul style="list-style-type: none"> The latest CAP included in 2020 ACAR (dated 25/08/2020) sighted. Revised CAP submitted to EPA 14/07/2020 sighted. - revisions have been made to reflect current Ministerial Statement conditions and incorporate relevant recommendations from the 2019 Annual Compliance Assessment Report; and in particular, to update the CAPs to include a definition of Potential Non-compliance, to be consistent with the OEPA (2012) Post Assessment Guidelines. Letter received from DWER 30/07/2020 advising that revised CAPs meet the requirements of Condition 4-1. 	Overall	As required	C	
805:M4.2	Compliance Reporting	The proponent shall submit to the CEO, the CAP required by condition 4-1 prior to implementation of the proposal.	Prepare a CAP. CAP reviewed and updated as appropriate over the life of the Project.	CAP req. Latest KIOP CAPs state annual basis for reporting (refer to Section 3 of CAPs). Evidence <ul style="list-style-type: none"> The CAP states the frequency of compliance reporting Review of ACAR (2023 ACAR) indicates that audits are conducted annually by a suitably qualified auditor The CAP outlines that requirements for the retention of compliance assessments – refer section 5 The CAP outlines the method of reporting potential non-compliances and corrective actions – refer section 4 The CAP includes a general table of contents The CAP outlines the public availability of the Annual Compliance Assessment Report – refer to Section 7 The initial CAP, as required by condition 4-1, was submitted to the CEO in September 2009, prior to implementation of the proposal. 	Design	Prior to implementation of the proposal and as required thereafter	CLD	
805:M4.2 (1-6)	Compliance Reporting	The CAP shall indicate the <ol style="list-style-type: none"> Frequency of compliance reporting Approach and timing of compliance assessments Retention of compliance assessments 	The CAP shall indicate the <ol style="list-style-type: none"> Frequency of compliance reporting Approach and timing of compliance assessments 	CAP req. Content within the CAP Evidence <ul style="list-style-type: none"> The latest CAP (Revision 8 dated 16/06/2020) states the frequency of compliance reporting and compliance assessment approach – refer to 	Design	Prior to implementation of the proposal	C	



AUDIT TABLE

PROPOSAL: Karara Iron Ore Project (KIOP)
STATEMENT: 805

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
		4. Reporting of potential non-compliances and corrective actions taken 5. Table of contents of compliance Assessment Reports 6. Public availability of the Compliance Assessments Reports	3. Retention of compliance assessments 4. Reporting of potential non-compliances and corrective actions taken 5. Table of contents of compliance Assessment Reports 6. Public availability of the Compliance Assessments Reports	Section 3 <ul style="list-style-type: none"> Review of ACAR (2023 ACAR) indicates that audits are conducted annually by a suitably qualified auditor The latest CAP (Revision 8 dated 16/06/2020) outlines that requirements for the retention of compliance assessments – refer section 5 The latest CAP (Revision 8 dated 16/06/2020) outlines the method of reporting potential non-compliances and corrective actions – refer section 4 and Appendix 2. The latest CAP (Revision 8 dated 16/06/2020) includes a general table of contents and a table of contents of compliance assessment reports in Appendix 3. The latest CAP (Revision 8 dated 16/06/2020) outlines the public availability of the Annual Compliance Assessment Report – refer to Section 7. 		and as required thereafter		
805:M4.3	Compliance Reporting	The proponent shall assess compliance with conditions in accordance with the CAP required by condition 4-1.	This Compliance Assessment Report shall indicate compliance with CAP conditions	CAP req. Confirm that the ACAR complies with CAP conditions Evidence 2024 ACAR included assessment of compliance (Appendix B: Statements of Compliance)	Overall	7 September annually	C	
805:M4.4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the CAP required by condition 4-1 and shall make those reports available when requested by the CEO.	All completed. Compliance Assessment Reports stored in KML Document Management System	CAP req. Completed ACARs to be managed through the KML Document Management System for ease of retrieval on request Evidence <ul style="list-style-type: none"> The 2023 ACAR and previous ACARs are retained in Folder 9.1 of KML's Filesite. A copy of the 2023 ACAR is retained on KML Document Management System and KML's intranet - sighted. 	Overall	Ongoing	C	
805:M4.5	Compliance Reporting	The proponent shall advise the CEO of any non-compliance as soon as practicable.	Non-compliances reported to DWER in writing as soon as practicable and within seven days of the non-compliance being confirmed by KML	CAP req. <ul style="list-style-type: none"> Letter to OEPA advising of non-compliances Non-compliance reports and correspondence between OEPA and KML on non-compliance Evidence <ul style="list-style-type: none"> Whilst review of the Environmental Incident Register found no non-compliances against Statement conditions reported during the reporting period, monitoring of Shield-backed Trapdoor Spiders, as required by Condition 9, has been discontinued following 2019 monitoring due to re-classification of the species. KML discussed discontinued spider monitoring during a meeting with DWER on 10 September 2021, DWER advised that as KML have evidence that the <i>Idiosoma nigrum</i> spider is not present on KML's tenements, KML can discontinue spider monitoring (as there is no need to monitor) and KML are considered to have met the intention of the Condition – meeting notes sighted. Following KML's request to remove Condition 9 of MS 805 relating to the spider monitoring program on 16/07/2018 and the Minister for Environment's request to EPA's inquiry into and report on the removal of Condition 9 as well as the application of offsets on 21/01/2019, EPA requested for additional offset related information for its inquiry into changing the implementation Condition 9 relating to KIOP MS 805 pursuant to section 46(1) of the EP Act on 18/05/2022. KML submitted a response to the EPA's request for additional offset related information including detail of environmental values of the surrendered M59/650 (associated with spider monitoring at KIOP), MoU with DBCA, current level of security of surrendered tenements and the final report of research on EPBC fauna stress monitoring on 25/05/2022 - sighted. KML submitted surrender documentation to DMIRS (now 'DEMIRS') in June 2021 and surrender of M59/650 was formally registered with the 	Overall	As soon as practicable and within seven days of the non-compliance being confirmed by KML	NC	



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
				<p>DMIRS (now 'DEMIRS') on 17/08/2021.</p> <ul style="list-style-type: none"> KML submitted a referral application for the KIOP Mine Life Extension Proposal (the Proposal) including the proposed removal of Condition 9 (and its associated sub-condition 9.1 – 9.5) in relation to the spider monitoring program to the EPA under s38 of the EP Act on 21/02/2022 and resubmitted the revised referral application to the EPA under s38C of the EP Act on 30/09/2022 with submission of additional info to the EPA on 22/12/2022. EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s38G(1) of the EP Act on 21/06/2023. EPAS advised on 13/06/2023 that the EPA's inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and EPAS expects staging of progression on the s46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal. – Email 'Re: Request for further information – KIOP – MS 805 – Section 46 inquiry' from the EPAS on 13/06/2023 was sighted. While the formal assessment of the Proposal continued during the reporting period, DWER-EPAS provided no updates on the progress on the removal of Condition 9 of MS805: Spider monitoring. 				
805:M4.6	Compliance Reporting	The proponent shall submit a Compliance Assessment Report annually from the date of issue of this Implementation Statement addressing the previous twelve-month period or other period as agreed by the CEO.	Compliance assessments conducted annually	<p>CAP req. Correspondence between KML and OEPA demonstrating annual submission of reports and submission of the ACAR by 31 August annually, with the reporting period aligned to the previous financial period (1 July – 30 June)</p> <p>Evidence 2023 ACAR submitted to the OEPA (now 'EPAS') on the 31/08/2023 – submission email sighted.</p>	Overall	Submit a Compliance Assessment Report on 7 September annually	C	
805:M4.6(1-5)	Compliance Reporting	The Compliance Assessment Report shall: <ol style="list-style-type: none"> Be endorsed by the proponent's Managing Director or a person, approved in writing by the CEO, delegated to sign on the Managing Director's behalf; Include a statement as to whether the proponent has complied with the conditions; Identify all non-compliances and describe corrective and preventative actions taken; Be made publicly available in accordance with the approved CAP Indicate any proposed changes to the CAP required by condition 4-1 	<ol style="list-style-type: none"> Compilation of associated compliance assessment report that is endorsed by KML's Chief Executive Officer or delegate Compliance Assessment Report submitted to DWER; Make reports publicly available in accordance with PAG4 – Post Assessment Guideline for Making Information publicly available (OEPA, 2012c) and Completed Compliance Assessment Reports indicating changes to the CAP 	<p>CAP req. Compilation of associated compliance assessment reports that is endorsed by KML's CEO or delegate</p> <p>Evidence</p> <ul style="list-style-type: none"> 2023 ACAR was endorsed by the delegate of KML's CEO – the endorsed 2023 ACAR sighted. 2023 ACAR submitted to the OEPA (now 'EPAS') on the 31/08/2023 – submission email sighted. 	As above for 805:M4.6	As above for 805:M4.6	C	
805:M5.1 (1-3)	Performance Review and Reporting	The proponent shall submit to the CEO a Performance Review Report at the conclusion of the first, second, fourth, sixth, eighth and tenth years after the start of implementation and then, at such intervals as the CEO may regard as reasonable, which addresses:	<p>Compilation of associated Performance Review Reports that:</p> <ol style="list-style-type: none"> consider the environmental risks and impacts; the performance objectives, standards and criteria related to these; the success of risk reduction/impact mitigation 	<p>CAP req. Compilation of associated PRR.</p>	Overall	Submit to the DWER a Performance Review Report within 2 months of the	CLD	



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
		<ol style="list-style-type: none"> the major environmental risks and impacts; the performance objectives, standards and criteria related to these; the success of risk reduction/impact mitigation measures and results of monitoring related to management of the major risks and impacts the level of progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable significant improvements gained in environmental management which could be applied to this and other similar projects. 	<ol style="list-style-type: none"> measures and results of monitoring related to management of the major risks and impacts consider the level of progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable identify significant improvements gained in environmental management. 	<p>Evidence</p> <ul style="list-style-type: none"> PRR for 2010 received by OEPA on 12/01/2011 (1st Year) PRR for 2011 received by OEPA on 4/01/2012 (2nd Year) PRR for 2013 submitted 8th November 2013 11/11/2013 (4th year) PRR for 2015 sent to OEPA via e-mail on 22/01/2016 (6th Year) PRR for 2017 to be submitted to OEPA by December 2017 (8th Year) PRR for 2019 submitted to OEPA on 08 May 2020 (10th year) <p>A letter was received from DWER dated 02/06/2020 advising that the PRR on 08 May 2020, submission occurred after the tenth year of implementation. The letter also advised that it was determined that additional PRRs were not required and the requirements of Condition 5-1 had been met.</p> <p>No PRR was required during this audit period.</p>		conclusion of the first, second fourth, sixth, eighth and tenth years after the start of implementation and then at such intervals as DWER may regard as reasonable		
805:M5.2	Performance Review and Reporting	The proponent shall make the Performance Review Reports required by condition 5-1 publicly available in a manner approved by the CEO.	Make reports publicly available in accordance with PAG4 – Post Assessment Guideline for Making information publicly available (OEPA, 2012c)	<p>CAP req.</p> <ul style="list-style-type: none"> PRRs made available to stakeholders, including members of the public, upon request and within 7 days of the proponent receiving the request. PRRs readily available in KML's Document Management System. Data sighted as part of this audit was readily available. <p>Evidence</p> <ul style="list-style-type: none"> PRRs available in KML document control system – PRRs are sighted in folder 9.5 of filesite (KML's Environmental Document Management System). During the reporting period, no stakeholders, including members of the public, had requested a copy of the PRR. 	Overall	Within seven days of the proponent receiving the request	C	
805:M6.1	Priority Ecological Community	During construction the proponent shall ensure that there is a system to delineate the area of works in order to meet the outcome of minimising the disturbance to, or loss of, the Blue Hills vegetation complex Priority Ecological Community.	<p>Establishment and implementation of the following KML procedures prior to construction:</p> <ul style="list-style-type: none"> Approvals Request and Ground Disturbance Procedure that includes a requirement to delineate the PEC; and Effective incident reporting process. 	<p>CAP req.</p> <ul style="list-style-type: none"> A Ground Disturbance Process that includes measures to restrict areas of works to the delineated approved areas. Works conducted within the delineated areas and an effective incident reporting process. <p>Evidence</p> <ul style="list-style-type: none"> Priority Ecological Community (PEC) protected through a number of Environmental Management System (EMS) documents and procedures, primarily through the Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004 which includes requirements when ground disturbance/clearing is proposed in close proximity to PECs, and post disturbance survey pick-up to confirm no over clearing. Records of Ground Disturbance Permits (e.g. GD-1440) viewed and found to be compliant with Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004 AR/GD Register sighted. Sighted GDs in filesite folder 4.4 Three breaches associated with Ground Disturbances were reported during the audit period under INX ref (#134253, #135263 and #137610). Two incidents were associated with minor driving off road, the third one was related to an attempt to use material from a topsoil stockpile to complete a task. Health, Safety and Environmental Inductions given to all employees and contractors includes information on ground disturbance, flora and vegetation management, dust management, feral animal management, fire management and hydrocarbon and chemical management. 	Construction	During ground disturbing activities	C	
805:M6.2	Priority Ecological Community	During operations, the proponent shall conduct mining and mining related activities in a manner which ensures that land clearing is kept to a minimum and adverse impacts from	Establishment and implementation of KML Environmental Management System, including key procedures for ground disturbance, flora and vegetation management, dust management, feral	<p>CAP req.</p> <p>Review implementation of KML Environmental Management System, including key procedures for ground disturbance, flora and vegetation management, dust management, feral animal management, fire management and hydrocarbon and chemical management.</p>	Operation	Ongoing	C	



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		mining and mining related activities is managed and controlled.	animal management, fire management and hydrocarbon and chemical management.	<p>Evidence</p> <p>KML's EMS contains the following key documents which include relevance to minimum clearing and reducing impacts and/or PEC protection from mining activities:</p> <ul style="list-style-type: none"> Health, Safety and Environmental Inductions given to all employees and contractors includes information on ground disturbance, flora and vegetation management, dust management, feral animal management, fire management and hydrocarbon and chemical management. Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004 Environmental Procedure – Flora, Weeds and Plant Pathogens CORP-EN-PRO-1009 Environmental Plan – Flora and Vegetation Health Monitoring Plan CORP-EN-PLN-1012 Environmental Plan – Dust Management Plan CORP-EN-PLN-1010 includes management measures for mine related fugitive dust based on the KIOP's potential impact on sensitive and ecological receptors in and around the Project's footprint including the Blue Hills vegetation complex PEC within the Project area. Environmental Procedure – Dust Monitoring CORP-EN-PRO-1005 Environmental Procedure – Terrestrial Fauna Management CORP-EN-PRO-1010 Environmental Plan – Environmental Waste Management CORP-EN-PLN-1013 outlines management actions of non-mineral waste generated from operations activities including management actions of hydrocarbons, hazardous wastes and other controlled wastes. Storage and Use of Hazardous Substances Standard CORP-HS-STD-1042 Environmental Procedure – Feral Animal Management and Monitoring CORP-EN-PRO-1050 Environmental Management Plan CORP-EN-PLN-1020 details the framework designed to ensure KML activities are systematically assessed, monitored, and controlled in order to minimise environmental impacts and to meet legal and other requirements. Environmental Plan – Flora and Vegetation Management CORP-EN-PLN-1011 outlines management actions for flora and vegetation, specific action for high impact (priority) flora and vegetation, and contingencies. <p>Most of the above environmental plans and procedures have been reviewed and updated as needed during current reporting period and available at KML's intranet – sighted.</p> <p>The 2023 vegetation health monitoring used the current vegetation health categories in consistent with those used for monitoring since 2016 as detailed in KML's letter in response to DWER's request to provide the most accurate representation of vegetation health data since commencement of vegetation health monitoring following their audit of Condition 6.2 of MS805 and MS806 on 21/09/2021 – KML's letter to DWER on 09/11/2021 was sighted.</p>				
805:M6.3	Priority Ecological Community	At all times the proponent shall ensure that adverse impacts from other threatening processes such as fire, weeds, disease and feral animals arising from its operations is managed and controlled.	Establishment and implementation of KML Environmental Management System, including key procedures for ground disturbance, flora and vegetation management, weed management, dust management, feral animal management, fire management and hydrocarbon and chemical management.	<p>CAP req.</p> <p>Review implementation of KML EMS, including key procedures for ground disturbance, flora and vegetation management, weed management, dust management, feral animal management, fire management and hydrocarbon and chemical management.</p> <p>Evidence</p> <ul style="list-style-type: none"> Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004 includes requirements when ground disturbance/clearing is proposed in close proximity to PECs, and post 	Overall	Ongoing	C	



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
				<ul style="list-style-type: none"> disturbance survey pick-up to confirm no over clearing. AR/GD Register sighted Sighted GD Release Form CORP-EN-FRM-1014 (GD-1432) for Stage 5 Karara Pit extension signed by all relevant parties including contractors and KML Environmental Department. Environmental Plan – Dust Management Plan CORP-EN-PLN-1010 includes management measures for mine related fugitive dust based on the KIOP’s potential impact on sensitive and ecological receptors in and around the Project’s footprint including the Blue Hills vegetation complex PEC within the Project area. Monitoring of the flora and health of the PEC conducted as per Flora and Vegetation Health Monitoring Plan CORP-EN-PLN-1012 (Section 4.2 – Monitoring). Records of vegetation health monitoring data show regular monitoring against weeds, dust, dust suppression water overspray, fauna impact and fire impact. Induction includes education on importance of clearing control, weeds, dust, dust suppression water overspray, feral animals and fire. Sighted toolbox materials covering key environmental awareness topics. Sighted posters covering key environmental awareness topics. Monitoring of weeds, fire, feral animals, dust deposition and dust suppression water overspray (as per Flora and Vegetation Health Monitoring Plan CORP-EN-PLN-1012 (Section 4 – Implementation and Operation) - sighted. Restricted access signage and rehabilitation signage in locations around site. 				
805:M6.4	Priority Ecological Community	The proponent shall develop and implement procedures and measures to restrict access to areas under its control that support the Blue Hills vegetation complex Priority Ecological Community to authorised personnel only.	Establishment and implementation of KML Environmental Management System, including key procedures for ground disturbance, flora and vegetation, traffic management, and training programs.	<p>CAP req.</p> <p>Evidence</p> <ul style="list-style-type: none"> Review implementation of KML EMS, including key procedures for ground disturbance Procedure, flora and vegetation, traffic management, signage restricting access and training programs. Traffic Management Plan CORP-HS-PLN-1008 includes requirement for no off-road driving (vehicles to remain on identified tracks), all care to be taken to ensure flora and fauna are not affected. KML Environmental Plan – Flora and Vegetation Health Monitoring (CORP-EN-PLN1012) includes measures to assess threats and impacts to vegetation (a decline in vegetation health) related to, but not limited to dust, weeds and dust suppression overspray. It also ensures that contingency measures were in place should a decline in vegetation health monitoring results to be observed, as well as the internal and regulatory reporting requirements are addressed for management of the Blue Hills vegetation complex PEC. Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004 includes but is not limited to requirements for buffers to be established/demarcated when ground disturbance/clearing activities proposed in close proximity to PEC, demarcation of hollow logs (habitat) for rehabilitation activities, identification of significant flora and conservation-significant fauna habitat. Restricted access signage and rehabilitation signage in locations around site. 	Overall	Ongoing	C	
805:M6.5.1	Priority Ecological Community	The proponent shall monitor impacts from mining and mining related activities due to <i>dust</i> on the Blue Hills vegetation complex Priority Ecological Community referred to in	Establishment and implementation of KML Environmental Management System, including key monitoring procedures for dust, flora and fauna, traffic and training programs.	<p>CAP req.</p> <ul style="list-style-type: none"> Monitoring results associated with the Dust, Flora and fauna, traffic management and training programs in relation to the PEC in ACAR. Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA. 	Overall	Ongoing	C	



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
		condition 6-1. This monitoring is to be carried out to the satisfaction of the CEO		<p>Evidence</p> <ul style="list-style-type: none"> Flora and Vegetation Health Monitoring Plan CORP-EN-PLN-1012 describes monitoring to occur in PEC. Records captured annually (September) of vegetation health monitoring data show regular monitoring against weeds, dust, feral fauna, water stress, erosion, soil salinity, vegetation health, species density and fire impact throughout the PEC at potential impact and control sites. Monitoring results for flora health, dust, saline water, erosion, feral animals and fire captured in 2024 ACAR (Section 6.4 – Flora Management). 				
805:M6.5.2	Priority Ecological Community	The proponent shall monitor impacts from mining and mining related activities due to <i>saline water application for dust control</i> on the Blue Hills vegetation complex Priority Ecological Community referred to in condition 6-1. This monitoring is to be carried out to the satisfaction of the CEO	Establishment and implementation of KML Environmental Management System, including key monitoring procedures for dust, saline water, flora and fauna, traffic management, and training programs.	<p>CAP req.</p> <ul style="list-style-type: none"> Monitoring results associated with the Dust, Flora and fauna, traffic management and training programs in relation to the PEC in ACAR. Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA. 	Overall	Ongoing	C	
				<p>Evidence</p> <ul style="list-style-type: none"> 2024 ACAR, refer section 6.2.4 Feral Animal Monitoring – occurs via regular inspection of landfill facilities and rehabilitated areas including fixed camera located in an area of Blue Hills PEC. 2024 ACAR, refer section 6.4.1 Vegetation Health - flora and vegetation health is conducted annually by an external consultant. Monitoring of vegetation health has demonstrated that the Blue Hills PEC has not been adversely impacted by KML operations. Review of the KML Incident Management System INX In-Control and 2024 ACAR indicated no incidents of PEC vegetation health decline in relation to the use of saline water for dust suppression. 				
805:M6.5.3	Priority Ecological Community	The proponent shall monitor impacts from mining and mining related activities due to <i>fire</i> on the Blue Hills vegetation complex Priority Ecological Community referred to in condition 6-1. This monitoring is to be carried out to the satisfaction of the CEO	Establishment and implementation of KML Environmental Management System, including key monitoring procedures for fire, flora and fauna, traffic management, and training programs.	<p>CAP req.</p> <ul style="list-style-type: none"> Monitoring results associated with the fire, flora and fauna, traffic management access and training programs in relation to the PEC in ACAR. Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA. 	Overall	Ongoing	C	
				<p>Evidence</p> <p>A review of INX In Control did not record any fires that posed a risk to the Blue Hills Vegetation Complex PEC during the reporting period.</p>				
805:M6.5.4	Priority Ecological Community	The proponent shall monitor impacts from mining and mining related activities due to feral species on the Blue Hills vegetation complex Priority Ecological Community referred to in condition 6-1. This monitoring is to be carried out to the satisfaction of the CEO	Establishment and implementation of KML Environmental Management System, including key monitoring procedures for feral animals, flora and fauna, traffic management, and training programs.	<p>CAP req</p> <ul style="list-style-type: none"> Monitoring results associated with feral animals, Flora and fauna, traffic management and training programs in relation to the PEC in ACAR. Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA. 	Overall	Ongoing	C	
				<p>Document</p> <ul style="list-style-type: none"> Feral fauna monitoring measures described in Environment Plan - Feral Animal Management CORP-EN-PLN-1009. Monitoring and trapping results of feral animals are included in the 2024 ACAR – refer section 6.2.4. 				
805:M6.6	Priority Ecological Community	In the event that the outcome of condition 6-1 is not being met or are not likely to be met, the proponent shall immediately provide and implement proposed management measures to the satisfaction of the CEO of the Department of Environment and Conservation.	Establishment and implementation of proposed management measures to the satisfaction of the CEO.	<p>CAP req</p> <p>Establishment and implementation of proposed management measures to the satisfaction of OEPA.</p>	Overall	Immediately, in the event that the outcome of condition 6-1 is not being met or are not likely to be met	C	
				<p>Document</p> <ul style="list-style-type: none"> Review of the KML Incident Management System INX In-Control and the Environmental Incident Register found no non-compliance against MS conditions were reported during the reporting period, and no incidents currently under investigation that may potentially be a non-compliance against MS Conditions. Review of the Vegetation Health Monitoring Register did not indicate vegetation impacts that would trigger reporting to DWER and subsequent implementation of additional management controls during the reporting period. 				



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
805:M7.1	Groundwater dependant vegetation	The proponent shall ensure that groundwater abstraction does not adversely affect the groundwater regime which supports vegetation on the Gilgai formation.	Condition deleted by MS895 published 04/05/2012	Condition removed in accordance with OEPA advice	Requirement removed			
805:M7.2	Groundwater dependant vegetation	The proponent shall develop ground water trigger levels for management and contingency actions prior to implementation of the proposal.	Condition deleted by MS895 published 04/05/2012	Condition removed in accordance with OEPA advice	Requirement removed			
805:M7.3	Groundwater dependant vegetation	The proponent shall monitor groundwater levels within and near to the Gilgai (formation) against the groundwater trigger levels referred to in condition 7-2 and implement management and contingency actions in the event that groundwater trigger levels are met. This monitoring is to be carried out to the satisfaction of the CEO.	Condition deleted by MS895 published 04/05/2012	Condition removed in accordance with OEPA advice	Requirement removed			
805:M7.4	Groundwater dependant vegetation	The proponent shall monitor the health and condition of vegetation in the Gilgai formation to demonstrate the requirements of condition 7-1 are being met. This monitoring is to be carried out to the satisfaction of the CEO.	Condition deleted by MS895 published 04/05/2012	Condition removed in accordance with OEPA advice	Requirement removed			
805:M7.5	Groundwater dependant vegetation	In the event that the requirements of condition 7-1 are not being met or are not likely to be met, the proponent shall immediately provide and implement proposed management measures to the satisfaction of the CEO.	Condition deleted by MS895 published 04/05/2012	Condition removed in accordance with OEPA advice	Requirement removed			
805:M8.1	Fauna protection from trenches	The proponent shall limit the length of any continuous open trench for pipelines to a maximum length of two and a half kilometres at any time.	Establishment and implementation of the following: Trench length limit included in contractor specifications; and Regular inspections to verify that open trenches do not exceed maximum length.	CAP req	<ul style="list-style-type: none"> Construction Trench Inspection Logs including measure of trench length open at any one time. Completion of ACAR. 	Overall	Ongoing	C
				Evidence	<ul style="list-style-type: none"> The requirements of these conditions are captured in the Environmental Procedure – Terrestrial Fauna CORP-EN-PRO-1010 (Section 3.8 – Trenching and Excavations). Current Licence to Take or Disturb Threatened Species (Fauna) TFA 2021-0056-2 valid until 31 January 2025) - sighted. Confirmed with site team that approximately 1520m of trenching for services installation was conducted at KIOP during the reporting period. 			
805:M8.2	Fauna protection from trenches	Fauna refuges and/or ramps are to be placed in the trench at intervals not exceeding 50 metres.	Establishment and implementation of the following: Requirement for fauna refuges/ramps included in contractor specifications; and Inspections to verify that fauna refuges/ramps are in place at the required spacing.	CAP req	<ul style="list-style-type: none"> Construction Trench Inspection Logs including verification fauna refuges being in place at the required spacing. Copies of contractor specification documents. Completion of ACAR. 	Overall	Ongoing	C
				Evidence	Confirmed with site team that approximately 1520m of trenching for services installation was conducted at KIOP during the reporting period.			
805:M8.3	Fauna protection from trenches	The proponent shall employ at least two qualified "fauna handlers" to remove fauna from the trench. The "fauna handlers" shall be able to demonstrate suitable experience to obtain a fauna handling licence from the Department of Environment and Conservation.	Two or more fauna handlers employed during pipeline trenching activities.	CAP req	Completion of ACAR demonstrating that the fauna handlers have suitable experience.	Overall	Ongoing	C
				Evidence	<ul style="list-style-type: none"> Current Authorisation (Section 40) to Take or Disturb Threatened Species (Fauna) TFA 2021-0056-2 valid until 31 January 2025) - sighted. Confirmed with site team that approximately 1520m of trenching for services installation was conducted at KIOP during the reporting period. 			
805:M8.4	Fauna protection from trenches	Inspection and removal of fauna from trenches by fauna handlers shall occur twice daily and within half an hour prior to the backfilling of trenches, with the first daily inspection and removal to be undertaken no later than 3.5 hours after sunrise, and the second inspection and removal to be undertaken daily between the hours of 3:00 pm and 6:00 pm.	Establishment and implementation of the following: Construction trench Inspection Logs; and Requirements for inspection and removal of fauna by fauna handlers included in contractor specifications.	CAP req	<ul style="list-style-type: none"> Construction Trench Inspection Logs. Completion of ACAR. 	Overall	Twice daily and within half an hour prior to the backfilling of trenches, with the first daily	C
				Evidence	Confirmed with site team that approximately 1520m of trenching for services installation was conducted at KIOP during the reporting period.			



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						inspection and removal to be undertaken no later than 3.5 hours after sunrise, and the second inspection and removal to be undertaken daily between the hours of 3:00pm and 6:00pm		
805:M8.5	Fauna protection from trenches	In the event of significant rainfall, the proponent shall, following the removal of fauna from the trench, pump out pooled water in the open trench (with the exception of groundwater) and discharge it via a mesh (to dissipate energy) to adjacent areas.	Establishment and implementation of the following: Construction trench inspection logs, and Requirements in the event of significant rainfall included in contractor specifications.	<p>CAP req</p> <ul style="list-style-type: none"> Construction Trench Inspection Logs. Copies of contractor specification documents. Completion of ACAR. <p>Evidence</p> <p>Confirmed with site team that approximately 1520m of trenching for services installation was conducted at KIOP during the reporting period.</p>	Overall	In the event of significant rainfall, following the removal of fauna from the trench	C	
805:M8.6	Fauna protection from trenches	Within 14 days following completion of the construction of each pipeline, the proponent shall provide a report on removed fauna and fauna deaths, within the pipeline corridor to the CEO.	Compile Report detailing removed fauna and fauna death occurrences, within pipeline trenches within 14 days following completion of the construction of each pipeline.	<p>CAP req</p> <ul style="list-style-type: none"> Construction Trench Inspection Logs. Report of removed fauna and fauna deaths. Correspondence with OPEA associated with submitting report. <p>Evidence</p> <p>Confirmed with site team that approximately 1520m of trenching for services installation was conducted at KIOP during the reporting period.</p> <p>No reports of any fauna falling into the trenches.</p>	Overall	Provide report to OEPA within 14 days of completion of the construction of each pipeline	C	
805:M9.1	Spider monitoring	Prior to the commencement of ground disturbing activities, the proponent shall implement its monitoring program for the Shield-backed Trapdoor Spider (<i>Idiosoma nigrum</i>) dated May 2009, or its updates, for the population within the proposed pit area, and in control areas free of disturbance from the proposal area.	Implementation of Shield-backed Trapdoor Spider Management and Monitoring Procedures prior to ground disturbing activity.	<p>CAP req</p> <p>Implementation of Shield-backed Trapdoor Spider Management and Monitoring Procedures prior to ground disturbing activity.</p> <p>Evidence</p> <ul style="list-style-type: none"> Karara implemented the Environmental Procedure - Shield-backed Trapdoor Spider Management and Monitoring CORP-EN-PRO-1025 in November 2010. The ACAR dated 28 November 2010 confirmed implementation of Shield-backed Trapdoor Spider Management and Monitoring Procedures prior to ground-disturbing activity. Appendix B Environmental Procedure - Shield-backed Trapdoor Spider Management and Monitoring CORP-EN-PRO-1025 shows monitoring locations. 	Overall	Implementation prior to the commencement of ground disturbing activities and then ongoing	CLD	
805:M9.2(1-2)	Spider monitoring	<i>The objective of the monitoring program required by condition 9-1 is to:</i> demonstrate that the persistence of the population of <i>Idiosoma nigrum</i> in the Blue Hills area will not be impacted as a result of the proposal, improve knowledge of the ecology and impacts of the proposal on <i>Idiosoma nigrum</i> .	The monitoring program has the objective of: demonstrating that the persistence of the population of <i>Idiosoma nigrum</i> in the Blue Hills area will not be impacted as a result of the proposal and improving knowledge of the ecology and impacts of the proposal on <i>Idiosoma nigrum</i> .	<p>CAP req</p> <p>The monitoring program has the objective of demonstrating that the persistence of the population of <i>Idiosoma nigrum</i> in the Blue Hills area will not be impacted as a result of the proposal.</p> <p>Evidence</p> <ul style="list-style-type: none"> Objective captured in the Environmental Procedure - Shield-backed Trapdoor Spider Management and Monitoring CORP-EN-PRO-1025 (Section 1.1). Works completed have identified that the species of <i>Idiosoma</i> associated with the Karara and Mungada projects is not <i>Idiosoma Nigrum</i>, and re-classified as <i>Idiosoma clypeatum</i> In a meeting with DWER on 10 September 2021, DWER advised that as KML have evidence that the <i>Idiosoma nigrum</i> spider is not present on KML's tenements, KML can discontinue spider monitoring (as there is no need to monitor) and KML are considered to have met the intention of the Condition – meeting notes sighted. Following KML's request to remove Condition 9 of MS 805 relating to the spider monitoring program on 16/07/2018 and the Minister for 	Overall	Ongoing	NC	



AUDIT TABLE

PROPOSAL: Karara Iron Ore Project (KIOP)
STATEMENT: 805

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
				<p>Environment's request to EPA's inquiry into and report on the removal of Condition 9 as well as the application of offsets on 21/01/2019, EPA requested for additional offset related information for its inquiry into changing the implementation Condition 9 relating to KIOP MS 805 pursuant to section 46(1) of the EP Act on 18/05/2022.</p> <ul style="list-style-type: none"> KML submitted a response to the EPA's request for additional offset related information including detail of environmental values of the surrendered M59/650 (associated with spider monitoring at KIOP), MoU with DBCA, current level of security of surrendered tenements and the final report of research on EPBC fauna stress monitoring on 25/05/2022 - sighted. KML submitted surrender documentation to DMIRS (now 'DEMIRS') in June 2021 and surrender of M59/650 was formally registered with the DMIRS (now 'DEMIRS') on 17/08/2021. KML submitted a referral application for the KIOP Mine Life Extension Proposal (the Proposal) including the proposed removal of Condition 9 (and its associated sub-condition 9.1 – 9.5) in relation to the spider monitoring program to the EPA under s38 of the EP Act on 21/02/2022 and resubmitted the revised referral application to the EPA under s38C of the EP Act on 30/09/2022 with submission of additional info to the EPA on 22/12/2022. EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s38G(1) of the EP Act on 21/06/2023. EPAS advised on 13/06/2023 that the EPA's inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and EPAS expects staging of progression on the s46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal. – Email 'Re: Request for further information – KIOP – MS 805 – Section 46 inquiry' from the EPAS on 13/06/2023 was sighted. While the formal assessment of the Proposal continued during the reporting period, DWER-EPAS provided no updates on the progress on the removal of Condition 9 of MS805: Spider monitoring. The most recent Shield-backed Trapdoor Spider Monitoring occurred in 2019, with no monitoring occurring in 2020, 2021, 2022 and 2023. Site Advisor Environment advised that spider monitoring has been discontinued following re-classification of the species. 				
805:M9.3(1-3)	Spider monitoring	The proponent shall monitor changes in the population in terms of: number and size of area(s) inhabited by spiders. number, size and distribution of burrows in occupied areas number of burrows occupied by spiders	Implementation of spider monitoring procedures identifying: the number, size and area(s) inhabited by spiders the number, size and distribution of burrows the number of burrows occupied by spiders.	<p>CAP req</p> <p>Implementation of spider monitoring procedures identifying the number, size and area(s) inhabited by spiders.</p> <p>Evidence</p> <ul style="list-style-type: none"> ACAR includes results from Shield-backed Trapdoor Spider monitoring. Environmental Procedure - Shield-backed Trapdoor Spider Management and Monitoring Procedure CORP-EN-PRO-1025 includes number and size of area(s) inhabited by spiders (Section 1.1) The most recent Shield-backed Trapdoor Spider Monitoring occurred in 2019, with no monitoring occurring in 2020, 2021 and 2022. Site Advisor Environment advised that spider monitoring has been discontinued following re-classification of the species. In a meeting with DWER on 10 September 2021, DWER advised that as KML have evidence that the <i>Idiosoma nigrum</i> spider is not present on KML's tenements, KML can discontinue spider monitoring (as there is no need to monitor) and KML are considered to have met the intention of the Condition – meeting notes sighted. Following KML's request to remove Condition 9 of MS 805 relating to the spider monitoring program on 16/07/2018 and the Minister for Environment's request to EPA's inquiry into and report on the removal of 	Overall	Ongoing	NC	



AUDIT TABLE

PROPOSAL: Karara Iron Ore Project (KIOP)
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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
				<p>Condition 9 as well as the application of offsets on 21/01/2019, EPA requested for additional offset related information for its inquiry into changing the implementation Condition 9 relating to KIOP MS 805 pursuant to section 46(1) of the EP Act on 18/05/2022.</p> <ul style="list-style-type: none"> KML submitted a response to the EPA's request for additional offset related information including detail of environmental values of the surrendered M59/650 (associated with spider monitoring at KIOP), MoU with DBCA, current level of security of surrendered tenements and the final report of research on EPBC fauna stress monitoring on 25/05/2022 - sighted. KML submitted surrender documentation to DMIRS (now 'DEMIRS') in June 2021 and surrender of M59/650 was formally registered with the DMIRS (now 'DEMIRS') on 17/08/2021. KML submitted a referral application for the KIOP Mine Life Extension Proposal (the Proposal) including the proposed removal of Condition 9 (and its associated sub-condition 9.1 – 9.5) in relation to the spider monitoring program to the EPA under s38 of the EP Act on 21/02/2022 and resubmitted the revised referral application to the EPA under s38C of the EP Act on 30/09/2022 with submission of additional info to the EPA on 22/12/2022. EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s38G(1) of the EP Act on 21/06/2023. EPAS advised on 13/06/2023 that the EPA's inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and EPAS expects staging of progression on the s46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal. – Email 'Re: Request for further information – KIOP – MS 805 – Section 46 inquiry' from the EPAS on 13/06/2023 was sighted. While the formal assessment of the Proposal continued during the reporting period, DWER-EPAS provided no updates on the progress on the removal of Condition 9 of MS805: Spider monitoring. 				
805:M9.4	Spider monitoring	The proponent shall submit the results of the monitoring program required by condition 9-1 to the CEO annually, as required.	Submit the results of the monitoring program to the DWER.	<p>CAP req</p> <p>Evidence</p> <p>Correspondence with the OEPA associated with submitting report including monitoring results and completion of ACAR.</p> <ul style="list-style-type: none"> Reporting completed in 2024 ACAR (Section 6.2.3). The most recent Shield-backed Trapdoor Spider Monitoring occurred in 2019, with no monitoring occurring in 2020, 2021 and 2022. Site Advisor Environment advised that spider monitoring has been discontinued following re-classification of the species. In a meeting with DWER on 10 September 2021, DWER advised that as KML have evidence that the <i>Idiosoma nigrum</i> spider is not present on KML's tenements, KML can discontinue spider monitoring (as there is no need to monitor) and KML are considered to have met the intention of the Condition – meeting notes sighted. Following KML's request to remove Condition 9 of MS 805 relating to the spider monitoring program on 16/07/2018 and the Minister for Environment's request to EPA's inquiry into and report on the removal of Condition 9 as well as the application of offsets on 21/01/2019, EPA requested for additional offset related information for its inquiry into changing the implementation Condition 9 relating to KIOP MS 805 pursuant to section 46(1) of the EP Act on 18/05/2022. KML submitted a response to the EPA's request for additional offset related information including detail of environmental values of the surrendered M59/650 (associated with spider monitoring at KIOP), MoU with DBCA, current level of security of surrendered tenements and the final report of research on EPBC fauna stress monitoring on 25/05/2022 	Overall	7 September annually	NC	



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
				<ul style="list-style-type: none"> - sighted. KML submitted surrender documentation to DMIRS (now 'DEMIRS') in June 2021 and surrender of M59/650 was formally registered with the DMIRS (now 'DEMIRS') on 17/08/2021. KML submitted a referral application for the KIOP Mine Life Extension Proposal (the Proposal) including the proposed removal of Condition 9 (and its associated sub-condition 9.1 – 9.5) in relation to the spider monitoring program to the EPA under s38 of the EP Act on 21/02/2022 and resubmitted the revised referral application to the EPA under s38C of the EP Act on 30/09/2022 with submission of additional info to the EPA on 22/12/2022. EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s38G(1) of the EP Act on 21/06/2023. EPAS advised on 13/06/2023 that the EPA's inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and EPAS expects staging of progression on the s46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal. – Email 'Re: Request for further information – KIOP – MS 805 – Section 46 inquiry' from the EPAS on 13/06/2023 was sighted. While the formal assessment of the Proposal continued during the reporting period, DWER-EPAS provided no updates on the progress on the removal of Condition 9 of MS805: Spider monitoring. 				
805:M9.5	Spider monitoring	In the event that condition 9-2(1) cannot be met, the proponent shall develop and implement management measures and contingency actions to the satisfaction of the CEO.	If the situation arises, establishment and implementation of management measures and contingency actions based on input from fauna specialist advisor(s) and the DWER	<p>CAP req</p> <p>Correspondences from the OEPA agreeing to management measures and contingency actions and acknowledgement these have been satisfactorily implemented and completion of ACAR.</p> <p>Evidence</p> <ul style="list-style-type: none"> Section 6, Table 4 of Environmental Procedure - Shield-backed Trapdoor Spider Management and Monitoring Procedure CORP-EN-PRO-1025 includes trigger criteria for contingency actions. The most recent Shield-backed Trapdoor Spider Monitoring occurred in 2019, no monitoring occurred in 2020, 2021 and 2022. Site Advisor Environment advised that spider monitoring has been discontinued following re-classification of the species. In a meeting with DWER on 10 September 2021, DWER advised that as KML have evidence that the <i>Idiosoma nigrum</i> spider is not present on KML's tenements, KML can discontinue spider monitoring (as there is no need to monitor) and KML are considered to have met the intention of the Condition – meeting notes sighted. Following KML's request to remove Condition 9 of MS 805 relating to the spider monitoring program on 16/07/2018 and the Minister for Environment's request to EPA's inquiry into and report on the removal of Condition 9 as well as the application of offsets on 21/01/2019, EPA requested for additional offset related information for its inquiry into changing the implementation Condition 9 relating to KIOP MS 805 pursuant to section 46(1) of the EP Act on 18/05/2022. KML submitted a response to the EPA's request for additional offset related information including detail of environmental values of the surrendered M59/650 (associated with spider monitoring at KIOP), MoU with DBCA, current level of security of surrendered tenements and the final report of research on EPBC fauna stress monitoring on 25/05/2022 - sighted. KML submitted surrender documentation to DMIRS (now 'DEMIRS') in June 2021 and surrender of M59/650 was formally registered with the DMIRS (now 'DEMIRS') on 17/08/2021. KML submitted a referral application for the KIOP Mine Life Extension 	Overall	In the event that condition 9-2(1) cannot be met	NC	



AUDIT TABLE

PROPOSAL: Karara Iron Ore Project (KIOP)
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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
				<p>Proposal (the Proposal) including the proposed removal of Condition 9 (and its associated sub-condition 9.1 – 9.5) in relation to the spider monitoring program to the EPA under s38 of the EP Act on 21/02/2022 and resubmitted the revised referral application to the EPA under s38C of the EP Act on 30/09/2022 with submission of additional info to the EPA on 22/12/2022. EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s38G (1) of the EP Act on 21/06/2023. EPAS advised on 13/06/2023 that the EPA's inquiry in relation to removal of Condition 9 of spider monitoring under s46 of the EP Act has been mostly placed on hold and EPAS expects staging of progression on the s46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal. – Email 'Re: Request for further information – KIOP – MS 805 – Section 46 inquiry' from the EPAS on 13/06/2023 was sighted.</p> <ul style="list-style-type: none"> While the formal assessment of the Proposal continued during the reporting period, DWER-EPAS provided no updates on the progress on the removal of Condition 9 of MS805: Spider monitoring. 				
805:M10.1	Fauna mortality register	The proponent shall prepare and implement strategies to avoid fauna deaths in areas of mining or mining related activities.	Preparation and implementation of strategies to avoid fauna deaths, including Western Spiny-tailed skink, Malleefowl and Shield-backed Trapdoor Spider management and monitoring procedures.	<p>CAP req</p> <ul style="list-style-type: none"> Fauna monitoring results. Statistics recorded in Fauna Mortality register. Western Spiny-tailed skink, Malleefowl and Shield-backed Trapdoor Spider management and monitoring procedures. Completion of ACAR. <p>Evidence Interview</p> <ul style="list-style-type: none"> Environmental Plan – Fauna Management CORP-EN-PLN-1008 Environmental Procedure – Terrestrial Fauna Management CORP-EN-PRO-1010 Environmental Plan - Feral Animal Management CORP-EN-PLN-1009 Environmental Procedure - Malleefowl Management and Monitoring CORP-EN-PRO-1035 Environmental Procedure - Shield-backed Trapdoor Spider Management and Monitoring CORP-EN-PRO-1025 Environmental Procedure - Western Spiny-tailed Skink Management and Monitoring CORP-EN-PRO-1024 Traffic Management Plan CORP-HS-PLN-1008 requires vehicles to travel on existing tracks/roads (no off-road travel), slow down in areas signposted where Malleefowl have been sighted and to maintain designated speed limits Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004 includes but is not limited to requirements for buffers to be established/demarcated when ground disturbance/clearing activities proposed in close proximity to PEC and active Malleefowl mounds, demarcation of hollow logs (habitat) for rehabilitation activities, identification of conservation-significant fauna habitat. Pre-ground inspection form includes checklist items that requires area to be inspected for Malleefowl mounds, inspection of known WStS habitat, Shield-backed Trapdoor Spider burrow. Malleefowl mound, WStS habitat and Shield-backed Trapdoor Spider burrows marked on map - sighted GD 1432. Site Advisor Environment confirmed that signage exists around site of where Malleefowl are active, wildlife crossing - signs on roads. Locations of the signage are on K-Maps and a Fauna Register maintained on Filesite – sighted. Posters, Toolbox Print-outs and sighting forms located across site, Toolbox talks run annually and 	Overall	Ongoing	C	



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				<p>fauna management is included in the environmental induction to site personnel – current environmental awareness materials for site induction is sighted.</p> <ul style="list-style-type: none"> Examples of a Malleefowl, Shield-Backed Trapdoor Spider and Western Spiny Tailed Skink and other environmental awareness materials/poster sighted via email, at site office and crib room. KML Fauna Register includes records of fauna mortalities – sighted on Filesite Review of the 'Rare Fauna Sightings' of the Fauna Register indicated one occurrence of Malleefowl mortality during the reporting period. The incident was reported to DBCA and DCCEEW in line with relevant EPBC approval conditions – emails to the regulators sighted No mortalities of WStS were recorded during the reporting period. 2024 ACAR – refer section 6.2 and 6.3 				
805:M10.2	Fauna mortality register	Prior to ground disturbing activity the proponent shall prepare and implement a Fauna Mortality Register for conservation significant species in the proposal area.	Preparation and implementation of a Fauna Mortality register.	<p>CAP req</p> <ul style="list-style-type: none"> Fauna Mortality Register. Completion of ACAR. 	Design	Prior to ground disturbing activity	C	
				<p>Evidence</p> <ul style="list-style-type: none"> Sighted KML Fauna Mortality register on filesite – register in use and up to date Fauna deaths and trapping data reported in ACAR – refer section 6.3 and 6.2.4 				
805:M10.3	Fauna mortality register	The proponent shall submit the strategies required by condition 10-1 to the CEO of the Department of Environment and Conservation	Submission to OEPA of key plans and strategies, including Western Spiny tailed skink, Malleefowl and Shield-backed Trapdoor Spider management and monitoring procedures.	<p>CAP req</p> <ul style="list-style-type: none"> Correspondence to OEPA associated with submitting and complying with plans and procedures. Completion of ACAR. 	Overall	Prior to ground disturbing activity	C	
				<p>Evidence</p> <ul style="list-style-type: none"> OEPA approval letter dated 13/01/2014 states that "If there are any changes to the Plans that would substantially affect the management actions or targets, the amended Plans would require submittal to the OEPA." Environmental Procedure - Western Spiny-tailed Skink Management and Monitoring CORP-EN-PRO-1024 and Environmental Procedure – Malleefowl Management and Monitoring CORP-EN-PRO-1035 were reviewed and updated in April 2022. However, only minor changes were made to the two procedures, which were unlikely to substantially affect the management actions or targets – updated version (Rev 5) of both procedures sighted. The updated procedures with table of changes were submitted to the DBCA and DAWE (now 'DCCEEW') – refer below. Malleefowl and Western Spiny-tailed Skink are regulated under EPBC Act approval for the project. Updated Environmental Procedure - Western Spiny-tailed Skink Management and Monitoring CORP-EN-PRO-1024 (Rev 5) and Environmental Procedure – Malleefowl Management and Monitoring CORP-EN-PRO-1035 (Rev 5) were submitted to the DBCA and DAWE (now 'DCCEEW') on 13/04/2022 in accordance with Condition 7 of the EPBC approval (2006/3017) and updated procedures requirements – emails to the regulators sighted. No changes to the Plans/Procedures that would substantially affect management actions for the Project have been made during the audit period. 				
805:M10.4	Fauna mortality register	The proponent shall review and revise the strategies required by condition 10-1 as required by the CEO of the Department of Environment and Conservation	Review and revise plans in accordance with comments received from DWER, in consultation with the Department of the Environment and Energy (DoEE) if comments affect management plans approved under	<p>CAP req</p> <p>The reviewed versions of the plans and procedures and associated document control information, identifying reason for revision of procedure (if situation arises that requires plans and procedures to be reviewed).</p>	Overall	As required by DWER	C	



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
			the <i>Environment Protection and Biodiversity Conservation Act 1999</i>	<p>Evidence</p> <ul style="list-style-type: none"> OEPA approval letter dated 13/01/2014 states that "If there are any changes to the Plans that would substantially affect the management actions or targets, the amended Plans would require submittal to the OEPA." Environmental Procedure - Western Spiny-tailed Skink Management and Monitoring CORP-EN-PRO-1024 and Environmental Procedure – Malleefowl Management and Monitoring CORP-EN-PRO-1035 were reviewed and updated in April 2022. However, only minor changes were made to the two procedures, which were unlikely to substantially affect the management actions or targets – updated version (Rev 5) of both procedures sighted. The updated procedures with table of changes were submitted to the DBCA and DAWE (now 'DCCEEW') – refer to evidence in audit code 805:M10.3. No request for plan revisions received from the OEPA during the audit period. 				
805:M11.1	Conservation significant reptiles	Prior to ground disturbing activities the proponent shall carry out field surveys for conservation significant reptile species.	Conduct pre – ground disturbance inspection for conservation significant reptile species.	<p>CAP req</p> <ul style="list-style-type: none"> Survey Report. Completion of ACAR. <p>Evidence</p> <ul style="list-style-type: none"> Environmental Procedure – Approvals Request and Ground Disturbance CORP-EN-PRO-1004 requires a pre ground disturbance site inspection to be carried out which includes identification of conservation significant flora and fauna habitat, hollow logs for use in rehabilitation activities, demarcation of boundaries/avoidance sites as required. Environmental Procedure – Approvals Request and Ground Disturbance CORP-EN-PRO-1004 requires a pre ground disturbance site inspection (Section 4.4. Pre - Ground Disturbance Inspection) to be carried out which includes inspection for all known Western Spiny-tailed Skink habitats and scat locations inspected to ensure there are no skinks in the area of clearing (Pre Ground Disturbance Site Inspection Form CORP-EN-FRM-1027). Records of GD Permits show checks for Western Spiny-tailed Skink habitats and scat locations taken place where required and all known habitats and scat locations are show in the GD map (GD-1434) – sighted. Western Spiny-tailed Skink Monitoring Register contains monitoring data from 2011- present – sighted. Site Advisor Environment confirmed that a check for Western Spiny-tailed Skinks occurs as part of the process prior to a ground disturbance permit issued. WStS monitoring was completed in 2023. Refer section 6.2.1 of 2024 ACAR. 	Overall	Prior to ground disturbing activity	C	
805:M11.2	Conservation significant reptiles	Subject to condition 11-3, should any conservation significant reptile species be located, the proponent shall to the extent practicable conduct mining and mining related activities in a manner which avoids impacts on those areas where conservation significant reptile species have been found.	Establishment and implementation of the Environmental Management System to effectively address significant reptile species, including the western Spiny-tailed Skink and associated Western Spiny-tailed Skink Translocation plans.	<p>CAP req</p> <p>Adherence to avoidance principles outlined in management plans and content associated with ACAR.</p> <p>Evidence</p> <ul style="list-style-type: none"> Environmental Procedure – Approvals Request and Ground Disturbance CORP-EN-PRO-1004 (Section 4.3.2 GD Boundaries and Buffer Zones) requires a standard 50m buffer to be applied to avoidance sites on GD map (unless otherwise advised by the Environment Department) for conservation significant flora/fauna including habitats, PECs, heritage sites etc. Procedure also requires a Ground Disturbance Release Form CORP-EN-FRM-1014 to be completed and a pre-GD inspection to be completed within 2 weeks prior to clearing commencing. Avoidance Site boundaries have been surveyed and marked out in the field by a competent surveyor prior to any ground disturbance activities 	Overall	When conservation significant reptile species are located	C	



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				<ul style="list-style-type: none"> using red and white striped flagging tape for flora and fauna sites; That if any clearing is required within 10 metres of the Ground Disturbance Boundary, the clearing works must be supervised by a spotter. All Avoidance Sites, Ground Disturbance Boundaries and field markings have been communicated and are clearly understood by the Contractor Supervisor, Equipment Operator/s and Spotter. No translocation of Western Spiny-tailed Skinks has occurred during the audit period. Review of KML Incident Management System INX In-Control indicated no occurrences of Western Spiny-tailed Skink mortalities during the audit period. 				
805:M11.3	Conservation significant reptiles	In the event that condition 11-2 cannot be achieved, conservation significant reptile species shall be re-located into areas of suitable habitat in an area safe from disturbance from mining and associated operations.	Establishment and implementation of the Environmental Management System to effectively address significant reptile species, including the western Spiny-tailed Skink management, monitoring and translocation procedure	<p>CAP req</p> <ul style="list-style-type: none"> Annual reporting on monitoring and translocation of significant reptile species, including the Western Spiny-tailed Skink results. <p>Evidence</p> <ul style="list-style-type: none"> KML Western Spiny-tailed Skink Register has been updated with the 2023 monitoring results – sighted. Translocation sites regularly monitored as shown in Western Spiny-tailed Skink Monitoring Register and monitoring results are reported in ACAR. Refer section 6.2.1 of 2024 ACAR. Translocation procedure described in Environmental Procedure - Western Spiny-Tailed Skink Management, Monitoring and Translocation CORP-EN-PRO-1024 (Section 4.4). Skink potential translocation sites viewed on KML's GIS and shown to be at least 6km away from any active mining area. No translocation of Western Spiny-tailed Skinks has occurred during the audit period. 	Overall	In the event that Condition 11-2 cannot be achieved	C	
805:M11.4	Conservation significant reptiles	Relocation of conservation significant reptile species as required by condition 11-3 shall be carried out to the requirements of the CEO of the Department of Environment and Conservation.	Lodging of "Permits to Take" under the <i>Wildlife Conservation Act</i> to seek approval for translocation of conservation significant reptile species	<p>CAP req</p> <ul style="list-style-type: none"> "Permit to Take" issued and complied with Completion of ACAR <p>Evidence</p> <ul style="list-style-type: none"> Current Licence to Take or Disturb Threatened Species (Fauna) TFA 2021-0056-2 valid until 31 January 2025) - sighted. No translocation of Western Spiny-tailed Skinks has occurred during the audit period. 	Overall	As required by Condition 11-3	C	
805:M12.1.1.a	Mine Closure and Rehabilitation	As mining progresses, the proponent shall commence progressive rehabilitation of the mine site area in accordance with the following: re-establishment of vegetation in the rehabilitation area to be comparable with that of the pre-mining vegetation such that the following criteria are met within five years following the cessation of productive mining: flora and vegetation are re-established with not less than 70 percent species composition (not including weed species).	Establishment of the progressive rehabilitation procedure, rehabilitation monitoring procedure and adherence to rehabilitation targets. Submittal of Rehabilitation Schedule to DWER and Director Environment of the DMIRS in Annual Environmental Report.	<p>CAP req</p> <ul style="list-style-type: none"> Correspondence with OEPA and DMP associated with submission and acceptance of rehabilitation schedule. Rehabilitation Monitoring Results. Completion of the ACAR. <p>Evidence</p> <ul style="list-style-type: none"> Progressive rehabilitation committed to in the Environmental Management Plan CORP-EN-PLN-1020. Site Advisor Environment confirmed that progressive rehabilitation occurs in accordance with Environmental Procedure - Land Rehabilitation CORP-EN-PRO-1002, and monitoring occurs in accordance with Environmental Procedure - Rehabilitation Performance Monitoring CORP-EN-PRO-1040. KML maintains a rehabilitation schedule CORP-EN-SCH-1006 which was submitted to and approved by the DWER 30 August 2013, and further revised and submitted to DWER in April 2020. DWER advised that the current rehabilitation schedule remained under assessment in September 2021. Commitment (flora and vegetation are re-established with not less than 70 percent species composition) captured in Environmental Procedure 	Overall	As mining progresses	C	



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PROPOSAL: Karara Iron Ore Project (KIOP)
STATEMENT: 805

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
				<ul style="list-style-type: none"> - Rehabilitation Performance Monitoring CORP-EN-PRO-1040 - 2023 ACAR includes data on the progress to targets (70% composition and 10% weeds) (2024 ACAR - Section 6.5 Rehabilitation). Clarification of the 70% species composition (not including weed species) to be an overall target (i.e. not for individual rehabilitation site) is proposed in the KIOP Mine Life Extension Proposal referral document (Section 8.1 – Proposed Changes to Conditions) under s38 of EP Act initially submitted to the DWER-EPAS on 21/02/2022 with resubmission of the revised referral application and additional information required by the EPAS on 30/09/2022 and 22/12/2022 respectively. EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s38G(1) of the EP Act on 21/06/2023. DWER-EPAS has yet provided clarification of the 70% species composition (not including weed species) to be an overall target (i.e. not for individual rehabilitation site) for rehabilitation of the Project. DWER-EPAS is aware this is an ongoing issue and expected it will be resolved when the Proposal is approved. 				
805:M12.1.1.b	Mine Closure and Rehabilitation	As mining progresses, the proponent shall commence progressive rehabilitation of the mine site area in accordance with the following: re-establishment of vegetation in the rehabilitation area to be comparable with that of the pre-mining vegetation such that the following criteria are met within five years following the cessation of productive mining: weed coverage consistent with recorded baseline levels or 10 percent, whichever is less.	Establishment of the progressive rehabilitation procedure, rehabilitation monitoring procedure and adherence to rehabilitation targets. Submittal of Rehabilitation Schedule to DWER and Director Environment of the DMIRS in Annual Environmental Report and adherence to rehabilitation	<p>CAP req</p> <ul style="list-style-type: none"> Correspondence with OEPA and DMP associated with submission and acceptance of rehabilitation schedule. Rehabilitation Monitoring Results – refer to ACAR Completion of the ACAR. <p>Evidence</p> <ul style="list-style-type: none"> Progressive rehabilitation committed to in the Environmental Management Plan CORP-EN-PLN-1020 Site Advisor Environment confirmed that progressive rehabilitation occurs in accordance with Environmental Procedure - Land Rehabilitation CORP-EN-PRO-1002, and monitoring occurs in accordance with Environmental Procedure - Rehabilitation Performance Monitoring CORP-EN-PRO-1040. KML maintains a rehabilitation schedule CORP-EN-SCH-1006 which was submitted to and approved by the DWER 30 August 2013, and further revised and submitted to DWER in April 2020. DWER advised that the current rehabilitation schedule remained under assessment in September 2021. Commitment (flora and vegetation are re-established with not less than 70 percent species composition) captured in Environmental Procedure - Rehabilitation Performance Monitoring CORP-EN-PRO-1040 - 2023 ACAR includes data on the progress to targets (70% composition and 10% weeds) (2023 ACAR - Section 6.5 Rehabilitation). Clarification of the 70% species composition (not including weed species) to be an overall target (i.e. not for individual rehabilitation site) is proposed in the KIOP Mine Life Extension Proposal referral document (Section 8.1 – Proposed Changes to Conditions) under s38 of EP Act initially submitted to the DWER-EPAS on 21/02/2022 with resubmission of the revised referral application and additional information required by the EPAS on 30/09/2022 and 22/12/2022 respectively. EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s38G(1) of the EP Act on 21/06/2023. DWER-EPAS has yet provided clarification of the 70% species composition (not including weed species) to be an overall target (i.e. not for individual rehabilitation site) for rehabilitation of the Project. DWER-EPAS is aware this is an ongoing issue and expected it will be resolved when the Proposal is approved. 	Overall	As mining progresses	C	



AUDIT TABLE

PROPOSAL: Karara Iron Ore Project (KIOP)
STATEMENT: 805

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
805:M12.1.2	Mine Closure and Rehabilitation	As mining progresses, the proponent shall commence progressive rehabilitation of the mine site area in accordance with the following: A schedule of the rate of rehabilitation acceptable to the CEO of the Department of Environment and Conservation, and the Director Environment of the Department of Mines and Petroleum	Establishment of the progressive rehabilitation procedure, rehabilitation monitoring procedure and adherence to rehabilitation targets. Submittal of Rehabilitation Schedule to DWER and Director Environment of the DMIRS in Annual Environmental Report	CAP req	<ul style="list-style-type: none"> Correspondence with OEPA and DMP associated with submission and acceptance of rehabilitation schedule. Rehabilitation Monitoring Results – refer to ACAR Completion of the ACAR. 	Overall	As mining progresses	C
				Evidence	<ul style="list-style-type: none"> Progressive rehabilitation committed to in the Environmental Management Plan CORP-EN-PLN-1020 Site Advisor Environment confirmed that progressive rehabilitation occurs in accordance with Environmental Procedure - Land Rehabilitation CORP-EN-PRO-1002, and monitoring occurs in accordance with Environmental Procedure - Rehabilitation Performance Monitoring CORP-EN-PRO-1040. KML maintains a rehabilitation schedule CORP-EN-SCH-1006 which was submitted to and approved by the DWER 30 August 2013, and further revised and submitted to DWER in April 2020. DWER advised that the current rehabilitation schedule remained under assessment in September 2021. Commitment (flora and vegetation are re-established with not less than 70 percent species composition) captured in Environmental Procedure - Rehabilitation Performance Monitoring CORP-EN-PRO-1040. 2023 ACAR includes data on the progress to targets (70% composition and 10% weeds) (2024 ACAR - Section 6.5 Rehabilitation). Clarification of the 70% species composition (not including weed species) to be an overall target (i.e. not for individual rehabilitation site) is proposed in the KIOP Mine Life Extension Proposal referral document (Section 8.1 – Proposed Changes to Conditions) under s38 of EP Act initially submitted to the DWER-EPAS on 21/02/2022 with resubmission of the revised referral application and additional information required by the EPAS on 30/09/2022 and 22/12/2022 respectively. EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s38G(1) of the EP Act on 21/06/2023. DWER-EPAS has yet provided clarification of the 70% species composition (not including weed species) to be an overall target (i.e. not for individual rehabilitation site) for rehabilitation of the Project. DWER-EPAS is aware this is an ongoing issue and expected it will be resolved when the Proposal is approved. 			
805:M12.2.1	Mine Closure and Rehabilitation	Within six months following the cessation of mining, the proponent shall take measures, as agreed with the CEO of the Department of Environment and Conservation and Director Environment of the Department of Mines and Petroleum, to ensure that permanent standing water within the pit void does (do) not result in an increase in feral fauna to a level that may have a measurable impact on native fauna or native flora on the Blue Hills Range in the vicinity of the project (proposal) area as compared to monitoring results obtained during mining.	This condition will be assessed following cessation of mining operations.	CAP req	<ul style="list-style-type: none"> Correspondence between KML, OEPA and DMP. Measures and reports containing monitoring results required by M12-2 Completion of ACAR. 	Closure	Within six months following the cessation of mining	NR
				Evidence	<ul style="list-style-type: none"> Environmental Procedure - Feral Animal Management and Monitoring CORP-EN-PRO-1050 addresses how feral animals will be controlled and monitored. 2024 ACAR – refer section 6.2.4 Feral Animal Monitoring which details the feral animal monitoring, sightings, and trapping records. Sightings of feral animals has varied slightly over the past three reporting periods, the number of cats sighted has significantly increased, potentially due to increased reporting, no goats or foxes sighted during this reporting period, possibly due to seasonal factors while the number of wild dogs/dingos sighted has slightly increased during this reporting period. Mining has not ceased at KIOP. 			



AUDIT TABLE

PROPOSAL: Karara Iron Ore Project (KIOP)
STATEMENT: 805

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
805:M12.2.2	Mine Closure and Rehabilitation	Within six months following the cessation of mining, the proponent shall monitor and record feral animal populations on the Blue Hills Range in the vicinity of the project (proposal) area at least once each calendar year for seven years.	This condition will be assessed following cessation of mining operations.	CAP req	<ul style="list-style-type: none"> Correspondence between KML, OEPA and DMP. Measures and reports containing monitoring results required by M12-2 Completion of ACAR. 	Closure	Within six months following the cessation of mining	NR
				Evidence	<ul style="list-style-type: none"> Environmental Procedure - Feral Animal Management and Monitoring CORP-EN-PRO-1050 addresses how feral animals will be controlled and monitored. 2024 ACAR – refer section 6.2.4 Feral Animal Monitoring which details the feral animal monitoring, sightings, and trapping records. Sightings of feral animals has varied slightly over the past three reporting periods, the number of cats sighted has significantly increased, no goats or foxes sighted during this reporting period, the number of wild dogs/dingos sighted has slightly increased during this reporting period. Mining has not ceased at KIOP. 			
805:M12.2.3	Mine Closure and Rehabilitation	Within six months following the cessation of mining, the proponent shall monitor and record Declared Rare Flora and Priority Flora species and vegetation condition as defined by Keighery (1994) on the Blue Hills Range in the vicinity of the project (proposal) area at least once each calendar year during spring for seven years.	This condition will be assessed following cessation of mining operations.	CAP req	<ul style="list-style-type: none"> Correspondence between KML, OEPA and DMP. Measures and reports containing monitoring results required by M12-2 Completion of ACAR. 	Closure	Within six months following the cessation of mining	NR
				Evidence	<ul style="list-style-type: none"> 2024 ACAR - refer section 6.4.1 Vegetation Health – monitoring of flora and vegetation (including DRF and PEC) health is conducted annually by an external consultant. Results to date show overall vegetation health at KIOP has not been adversely affected, however four quadrats at KIOP have slightly declined in vegetation condition. This provides baseline data for comparison following the cessation of mining at KIOP. Mining has not ceased at KIOP. 			
805:M12.2.4	Mine Closure and Rehabilitation	Within six months following the cessation of mining, the proponent shall report the results of the monitoring to the CEO of the Department of Environment and Conservation, and the Director Environment of the Department of Mines and Petroleum, as part of the annual compliance reporting under condition 4.	Not required – This condition pertains to the Mine Closure phase and will therefore only be assessed following the cessation of mining.	CAP req	<ul style="list-style-type: none"> Correspondence between KML, OEPA and DMP. Measures and reports containing monitoring results required by M12-2 Completion of ACAR. 	Closure	Within six months following the cessation of mining	NR
				Evidence	<ul style="list-style-type: none"> See Evidence Section for Audit Code M12.2.1. Mining has not ceased at KIOP. 			
805:M12.3	Mine Closure and Rehabilitation	Within five years of the cessation of mining, the proponent shall determine and provide a report on the long term management of the pit lake to the satisfaction of the Minister for Environment and Minister for Mines and Petroleum in liaison with the Department of Environment and Conservation and the Department of Mines and Petroleum.	Not required – This condition pertains to the Mine Closure phase and will therefore only be assessed following the cessation of mining.	CAP req	Rehabilitation performance monitoring reports and correspondence showing evidence of submission to OEPA and DMP on an annual basis.	Closure	Within six months following the cessation of mining	NR
				Evidence	<ul style="list-style-type: none"> See Evidence Section for Audit Code M12.2.1. Mining has not ceased at KIOP. 			
805:M12.4	Mine Closure and Rehabilitation	In liaison with the Department of Environment and Conservation and the DMP, the proponent shall monitor progressively the performance of rehabilitation a required by condition 12-1 based on annual reporting	Progressive monitoring of rehabilitation establishment and implementation of plans and procedures to address progressive rehabilitation and rehabilitation monitoring including rates of monitoring	CAP req	Report on rehabilitation monitoring results submitted to DWER and DMIRS	Overall	Ongoing	C
Evidence	<ul style="list-style-type: none"> 2024 ACAR – refer section 6.5.1. In accordance with Environmental Procedure - Rehabilitation Performance Monitoring CORP-EN-PRO-1040, monitoring of progressive rehabilitation performance at KIOP is conducted in September annually by an external consultant. An average of 70% species composition across KIOP area as a whole was achieved, however the quadrat KARWD01 has not achieved the 70% species composition target during the reporting period (See 2024 ACAR – refer Section 6.5.6). Reporting has occurred as per Annual Environmental Reporting requirements. 							



AUDIT TABLE

PROPOSAL: Karara Iron Ore Project (KIOP)
STATEMENT: 805

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
805 M12 5	Mine Closure and Rehabilitation	The proponent shall submit annually a report of the rehabilitation performance monitoring required by condition 12-4 to the CEO of the Department of Environment and Conservation and the Director of Environment of the DMP	Preparation and submission of rehabilitation performance monitoring reports	CAP req	Submission of annual performance monitoring reports to DWER and DMIRS	Overall	7 September annually	C
				Evidence	<ul style="list-style-type: none"> 2024 ACAR – refer section 6.5.1. In accordance with Environmental Procedure - Rehabilitation Performance Monitoring CORP-EN-PRO-1040, monitoring of progressive rehabilitation performance at KIOP is conducted in September annually by an external consultant. An average of 70% species composition across KIOP area as a whole was achieved, however the quadrat KARWD01 has not achieved the 70% species composition target during the reporting period (See 2024 ACAR – refer Section 6.5.6). Reporting has occurred as per Annual Environmental Reporting requirements. 			
805 M12 6	Mine Closure and Rehabilitation	The proponent shall make the reports required by Condition 12-2 and 12-5 publicly available in a manner approved by the CEO of the Department of Environment and Conservation	Make reports publicly available in accordance with PAG4- Post Assessment Guideline for Making information publicly available z9EPA, 2-012c)	CAP req	Make reports available to stakeholders including members of the public upon request and within 7 days of the proponent receiving the request	Overall	Within seven days of the proponent receiving the request	C
				Evidence	The KIOP rehabilitation monitoring information is detailed in Section 6.5.6 of the 2024 ACAR, which is available in KML document control system and on KML's website available to the public members.			

APPENDIX C: MS806 STATEMENTS OF COMPLIANCE AND AUDIT TABLE

Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	MUNGADA IRON ORE PROJECT, 220 KILOMETRES EAST-SOUTHEAST OF GERALDTON AND 320 KILOMETRES NORTH-NORTHEAST OF PERTH, SHIRE OF PERENJORI
Statement Number	806
Proponent Name	Karara Mining Limited
Proponent's Australian Company Number <i>(where relevant)</i>	ACN 070 871 831

2. Statement of Compliance Details


Reporting Period	1/07/23 to 30/06/24
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Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input type="checkbox"/>	Construction	<input type="checkbox"/>	Operation	<input type="checkbox"/>	Decommissioning	<input checked="" type="checkbox"/>

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	2
<p>An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table must be prepared and maintained in accordance with the Department of Water and Environmental Regulation (DWER) <i>Post Assessment Guideline for Preparing an Audit Table</i>, as amended from time to time. The 'Status Column' of the audit table must accurately describe the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms that may be used by the proponent in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.</p>	

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)			
No (please proceed to Section 3)	<input checked="" type="checkbox"/>	Yes (please proceed to Section 4)	<input type="checkbox"/>

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

INITIALS: _GT 

3. Details of Non-compliance(s) and/or Potential Non-compliance(s)

The information required Section 3 must be provided for each non-compliance or potential non-compliance identified during the reporting period covered by this Statement of Compliance.

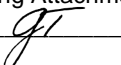
Non-compliance/potential non-compliance 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?
MS806 Condition 11.1.1a
Was the implementation condition or procedure non-compliant or potentially non-compliant?
Minor Non-compliance
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?
It was identified during the 2023/2024 audit that the above Conditions has not been met. As such, Condition 4.5 associated with non-compliance reporting has also been recorded as a non-compliance.

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally Date _____ <input type="checkbox"/> Reported to DWER in writing Date _____	<input checked="" type="checkbox"/> No

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?
<p>Condition 11.1.1a requires re-establishment of vegetation in the rehabilitation area to be comparable with that of the pre-mining vegetation such that the following criteria are met within five years following the cessation of productive mining and flora and vegetation are re-established with not less than 70 percent species composition (not including weed species).</p> <p>Not all areas of MIOP have been rehabilitated within five years of mining cessation as parts of MIOP (estimated at 3.7% of the MIOP project footprint) are currently utilised to support mining at KIOP, including pits for water storage and supply, access tracks, transmission line, a laydown yard and an emergency response training area. Those areas are expected to be required until the completion of mining at KIOP in approximately 30 years.</p> <p>Although average of 70% species composition was achieved for MIOP as a whole for the area, however 70% for one monitoring quadrat BHNWD01 was not achieved, but this was due to persistent over-abundance of one species (<i>Maireana trichopteran</i>), which was recorded 409 individuals in 2023, while the number of species present at this site has decreased to 14 species compared to 24 species recorded in last year's monitoring.</p> <p>Although DWER has been notified in previous Annual Compliance Assessment Reports (ACARs) and is aware this is an ongoing non-compliance as the un-rehabilitated MIOP area is being utilised to support KIOP operations, the individual monitoring quadrat BHNWD01 not meeting the 70% species composition target for MIOP should have been reported to DWER as soon as practicable.</p>
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)
Mungada Iron Ore Project

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

INITIALS: _GT_ 

<p>What was the cause(s) of the non-compliance or potential non-compliance?</p> <p>Parts of MIOP (estimated at 3.7% of the MIOP project footprint) are currently utilised to support mining at KIOP, including pits for water storage and supply, access tracks, transmission line, a laydown yard and an emergency response training area. Those areas are expected to be required until the completion of mining at KIOP in approximately 30 years. This has resulted in the non-compliance of Condition 11.1.1a to become an ongoing issue.</p> <p>The continuous missing the 70% species composition target at individual MIOP rehabilitation monitoring quadrat has also caused the non-compliance of Condition 11.1.1a over years, though this was due to over-abundance of one species recorded at the monitoring quadrat, which has caused the Shannon diversity index to drop due to less evenness of the species recorded at the monitoring quadrat.</p>
<p>What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?</p> <p>A revised referral for the Karara Iron Ore Project (KIOP) Mine Life Extension (MLE) Proposal, which incorporates the entire footprint previously approved under MIOP (MS806) (except those areas within the tenements that are no longer held by KML) was submitted to the DWER-EPAS under s38C of the EP Act on 30/09/2022. DWER-EPAS accepted the revised referral and decided to assess the Proposal at a level of 'Assess - Referral Information with additional information required under s40(2)(a) and public review s40(5)' pursuant to s38G(1) of the EP Act on 21/06/2023. It is expected this will resolve the ongoing non-compliance with MS806 Condition 11.1.1a when the Proposal is approved and those MIOP areas will be used for the KIOP mine life operations.</p> <p>While continuous monitoring of the rehabilitation sites at MIOP will be undertaken in accordance with Condition 11.1.1, KML will continue to work closely with the DWER-EPAS during the following assessment of the KIOP MLE Proposal and expect to resolve this ongoing non-compliance when the Proposal is approved.</p>
<p>What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?</p> <p>As stated above, KML will continue to work closely with the DWER-EPAS during the following assessment of the KIOP MLE Proposal and expect to resolve this ongoing non-compliance when the Proposal is approved.</p>
<p>Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:</p> <ul style="list-style-type: none"> • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. <p>(the above information may be provided as an attachment to this Statement of Compliance)</p>

For additional non-compliance or potential non-compliance, please duplicate this page as required.

4. Proponent Declaration

I, Gaomai Trench (General Manager HSEC), (*full name and position title*) declare that I am authorised on behalf of Karara Mining Limited (*being the person responsible for the proposal*) to submit this form and that the information contained in this form is true and not misleading.

Signature: *gaomai Trench* Date:30/08/2024.....

Please note that:

- it is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give or cause to be given information that to his knowledge is false or misleading in a material particular; and
- the Chief Executive Officer of the DWER has powers under section 47(2) of the *Environmental Protection Act 1986* to require reports and information about implementation of the proposal to which the statement relates and compliance with the implementation conditions.

5. Submission of Statement of Compliance

One hard copy and one electronic copy (preferably PDF on CD or thumb drive) of the Statement of Compliance are required to be submitted to the Chief Executive Officer, DWER, marked to the attention of Manager, Compliance (Ministerial Statements).

Please note, the DWER has adopted a procedure of providing written acknowledgment of receipt of all Statements of Compliance submitted by the proponent, however, the DWER does not approve Statements of Compliance.

6. Contact Information

Queries regarding Statements of Compliance, or other issues of compliance relevant to a Statement may be directed to Compliance (Ministerial Statements), DWER:

Manager, Compliance (Ministerial Statements)

Department of Water and Environmental Regulation

Postal Address: Locked Bag 10
Joondalup DC
WA 6919

Phone: (08) 6364 7000

Email: compliance@dwer.wa.gov.au

7. Post Assessment Guidelines and Forms

Post assessment documents can be found at www.epa.wa.gov.au

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

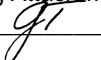
INITIALS: _GT *GT*

ATTACHMENT 1

Table 1 Compliance Status Terms

Compliance Status Terms	Abbrev	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: <ul style="list-style-type: none"> ongoing requirements that have been met during the reporting period; and requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: <ul style="list-style-type: none"> audit elements have a finite period of application (e.g. construction activities, development of a document); the action has been satisfactorily completed; and the DWER has provided written acceptance of 'completed' status for the audit element.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	<p>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</p> <p>The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).</p>

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

INITIALS: _GT 



AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project (MIOP)
STATEMENT: 806

LDNote:

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the Minister's Statement for full detail/precise wording of individual elements.
- Code prefixes: M = Minister's condition, P = Proponent's commitment.
- Acronyms list: CEO = Chief Executive Officer of OEPA; DEC = Department of Environment Regulation; DPAW = Department of Parks and Wildlife; DIA = Department of Indigenous Affairs; DMP = Department of Mining and Petroleum; DWER = Department of Water and Environmental Regulation; EPA = Environmental Protection Authority; DoH = Department of Health; DoW = Department of Water, Minister for Env = Minister for the Environment; OEPA = Office of the Environmental Protection Authority.
- Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non – compliant, NR = Not Required at this stage. Please note the terms VR = Verification Required and IP = In Process are only for OEPA use.

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS806	Further information
806:M1.1	Proposal Implementation	The proponent shall implement the proposal as documented and described in schedule 1 of this statement subject to the conditions and procedures of this statement. In implementing the proposal, the proponent shall not increase the mine pit footprint beyond that delineated by MGA coordinates listed in schedule 2.	Project implemented in accordance with these criteria.	CAP req. Project implemented in accordance with this criteria. Project implemented in accordance with this criteria through ACAR Evidence No mining/disturbance occurred during reporting period. A review of the GIS database indicated that following total area of disturbance to date: <ul style="list-style-type: none"> • Pits (65.00ha) • Waste dumps (118.42ha) • Infrastructure (15.53ha) • Haul road (21.66ha) • Gravel pits (0ha) • Powerline corridor (9.28ha) • Rail siding (0ha) 	Overall	Ongoing	C	
806:M2.1	Proponent Nomination and Contact Details	The proponent for the time being nominated by the Minister for Environment under sections 38(6) or 38(7) of the <i>Environmental Protection Act 1986</i> is responsible for the implementation of the proposal.	The project substantially commenced by the proponent in accordance with 806:M3.1	CAP req. Commencement of project works by the proponent Evidence The Proposal has been substantially implemented as evidenced by ACARs submitted from 2009 to present - refer to previous ACARs to date for details of Project commencement and implementation.	Overall	Approval void 9 September 2014 if project not substantially commenced	C	
806:M2.2	Proponent Nomination and Contact Details	The proponent shall notify the CEO of the Department of Environment and Conservation of any change of the name and address of the proponent for the serving of notices or other correspondence within 30 days of such change.	Letter notifying OEPA of any change in proponent details.	CAP req. Letter notifying the OEPA of any change in proponent details. Evidence The Proponent details are consistent with the company details on the KML website (Karara Mining) (https://www.kararamining.com.au/#) KML notified DWER via email 25/06/2020 of change of address details (change of building floor only). DWER acknowledged change of address details via return email 25/06/2020 – email sighted.	Overall	Within 30 days of such change.	C	
806:M3.1	Time Limit of Authorisation	The authorisation to implement the proposal provided for in this statement shall lapse and be void five years after the date of this statement if the proposal to which this statement relates is not substantially commenced.	Commencement of project works	CAP req. Commencement of project works Evidence Audited as compliant in previous audit period, no further action required	Overall	Approval void 9 September 2014 if project not substantially commenced	CLD	
806:M3.2	Time Limit of Authorisation	The proponent shall provide the CEO with written evidence which demonstrates that the proposal has substantially commenced on or before the expiration of five years from the date of this statement	Letter to OEPA which demonstrates that the proposal has substantially commenced	CAP req. CAP indicates proposal has substantially commenced on or before expiration of five years of statement Evidence Audited as compliant in previous audit period (Copy of audit report in 2020 ACAR), no further action required.	Overall	Provide letter to DWER on or before 9 September 2014	CLD	
806:M4.1	Compliance Reporting	The proponent shall prepare and maintain a CAP to the satisfaction of the CEO.	Prepare a CAP. CAP reviewed and updated as appropriate over the life of the Project.	CAP req. <ul style="list-style-type: none"> • The preparation of a CAP • Advice from OEPA advising that the CAP is satisfactory 	Overall	As required	C	



AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project
STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS806	Further information
				Evidence <ul style="list-style-type: none"> Correspondence received from OEPA (dated 21/08/2014) stating CAP submitted with letter dated 11/07/2014, meets the requirements of Condition 4-2 The latest CAP included in 2020 ACAR (dated 25/08/2020) - sighted. Revised CAP submitted to EPA 14/07/2020 sighted. - revisions have been made to reflect current Ministerial Statement conditions and incorporate relevant recommendations from the 2019 Annual Compliance Assessment Report; and in particular, to update the CAPs to include a definition of Potential Non-compliance, to be consistent with the OEPA (2012) Post Assessment Guidelines. Letter received from DWER 30/07/2020 advising that revised CAPs meet the requirements of Condition 4-1. 				
806:M4.2.	Compliance Reporting	The proponent shall submit to the CEO the CAP required by condition 4-1 prior to implementation of the proposal.	Prepare a CAP. CAP reviewed and updated as appropriate over the life of the Project	CAP req. Preparation of a CAP Evidence <ul style="list-style-type: none"> Correspondence received from OEPA (dated 21/08/2014) stating CAP submitted with letter dated 11/07/2014, meets the requirements of Condition 4-2 The latest CAP included in 2020 ACAR (dated 25/08/2020) sighted. Revised CAP submitted to EPA 14/07/2020 sighted. - revisions have been made to reflect current Ministerial Statement conditions and incorporate relevant recommendations from the 2019 Annual Compliance Assessment Report; and in particular, to update the CAPs to include a definition of Potential Non-compliance, to be consistent with the OEPA (2012) Post Assessment Guidelines. Letter received from DWER 30/07/2020 advising that revised CAPs meet the requirements of Condition 4-1. 	Design	Prior to implementation of the proposal	CLD	
806:M4.2.(1-6)	Compliance Reporting	<i>The CAP shall indicate the:</i> <ol style="list-style-type: none"> Frequency of compliance reporting Approach and timing of compliance assessments Retention of compliance assessments Method of reporting of potential non-compliances and corrective actions taken Table of contents of compliance assessment reports; and Public availability of ACAR 	<i>The CAP shall indicate the:</i> <ol style="list-style-type: none"> Frequency of compliance reporting Approach and timing of compliance assessments Retention of compliance assessments Method of reporting of potential non-compliances and corrective actions taken Table of contents of compliance assessment reports; and Public availability of Compliance Assessment Reports 	CAP req. Content within the CAP Evidence <p>The latest MIOP CAP (Revision 8 dated 16/06/2020) states:</p> <ul style="list-style-type: none"> Compliance assessment approach and frequency (refer to Section 3 of the CAP). Retention of compliance assessments (refer to Section 5 of the CAP). Method of reporting of potential non-compliances and corrective actions taken (refer to Section 4 and Appendix 2 of the CAP). The CAP includes a general table of contents and table of contents of compliance assessment reports (refer to Appendix 3 of the CAP). Public availability of ACAR (refer to Section 7 of the CAP). 	Design	Prior to implementation of the proposal and as required thereafter	C	
806:M4.3	Compliance Reporting	The proponent shall assess compliance with conditions in accordance with the CAP required by condition 4-1.	This ACAR shall indicate compliance with CAP conditions	CAP req. Confirm that the ACAR complies with CAP conditions Evidence <p>2024 ACAR included assessment of compliance against (Appendix C: Statement of Compliance)</p>	Overall	31 August annually	C	
806:M4.4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the compliance assessment plan required by condition 4-1 and shall make those reports available when requested by the CEO.	All completed ACARs stored in KML Document Management System	CAP req. Completed ACARs to be managed through the KML Document Management System for ease of retrieval on request Evidence <ul style="list-style-type: none"> The 2023 ACAR and previous ACARs are retained in Folder 9.1 of KML's Filesite - sighted. A copy of the 2023 ACAR is retained on KML Document Management System and KML's intranet - sighted. 	Overall	Ongoing	C	



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS806	Further information
806:M4.5	Compliance Reporting	The proponent shall advise the CEO of any non-compliance as soon as practicable.	Non-compliances reported to OEPA in writing as soon as practicable and within seven days of the non-compliance being confirmed by KML	<p>CAP req.</p> <ul style="list-style-type: none"> Letter to OEPA advising of non-compliances Non-compliance reports and correspondence between OEPA and KML on non-compliance <p>Evidence</p> <ul style="list-style-type: none"> Whilst review of the Environmental Incident Register and KML Incident Management System INX In-Control found no non-compliance against Statement conditions were reported during the reporting period, one minor non-compliance associated with not meeting the 70% species composition target for MIOP (e.g. only at monitoring quadrat BHNWD01) within five years of following the cessation of productive mining (Condition 11.1.1a) was identified during this audit. KML discussed potential inclusion of the MIOP areas that are currently used to support mining at KIOP in the KIOP MLE Proposal with DWER-EPAS in September 2021 – meeting notes sighted. This would resolve non-compliance with Condition 11.1.1a while those MIOP areas are used for ongoing KIOP operations. A revised KIOP Mine Life Extension (MLE) Proposal referral document was submitted to the EPA on 30/09/2022. The revised referral application incorporated the currently approved MIOP area under MS806 to supporting ongoing operations of the KIOP MLE Proposal. The revised referral also requested EPA's clarification of the 70% species composition (not including weed species) to be an overall target (i.e. not for individual rehabilitation site) within five years following cessation of operational mining. EPA decided to assess the KIOP MLE Proposal, which incorporates the currently approved MIOP area under MS806 at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s38G(1) of the EP Act on 21/06/2023. EPAS has yet provided clarification of the 70% species composition (not including weed species) to be an overall target (i.e. not for individual rehabilitation site) within five years following cessation of operational mining. DWER was aware this is an ongoing non-compliance during their audit on the MS806 in September 2021 – Statement 806 Compliance Audit Report 2021 was sighted. While DWER-EPAS continued formal assessment of the Proposal during the reporting period, no further comments were received from DWER on this ongoing non-compliance, which was also identified in the 2023 ACAR for MIOP. 	Overall	As soon as practicable and within seven days of the non-compliance being confirmed by KML	NC	
806M:4.6	Compliance Reporting	The proponent shall submit a compliance assessment report annually from the date of issue of this Implementation Statement addressing the previous twelve-month period or other period as agreed by the CEO.	Compliance assessments conducted annually	<p>CAP req.</p> <p>Correspondence between KML and OEPA demonstrating annual submission of reports and submission of the ACAR by 31 August annually, with the reporting period aligned to the previous financial period (1 July – 30 June)</p> <p>Evidence</p> <p>2023 ACAR submitted to the OEPA on the 31/08/2023 – submission email sighted.</p>	Overall	Submit a Compliance Assessment Report on 31 August annually	C	
806M:4.6(1-5)	Compliance Reporting	The compliance assessment report shall: 1. be endorsed by the proponent's Managing	1. Compilation of associated compliance assessment reports that is endorsed by KML's Chief Executive Officer or delegate	<p>CAP req.</p> <p>Compilation of associated compliance assessment reports that is endorsed by KML's CEO or delegate</p>	As above	As above	C	



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		<p>Director or a person, approved in writing by the CEO, delegated to sign on the Managing Director's behalf.</p> <ol style="list-style-type: none"> 2. Include a statement as to whether the proponent has complied with the conditions 3. identify all non-compliances and describe corrective and preventative actions taken. 4. be made publicly available in accordance with the approved CAP 5. indicate any proposed changes to the CAP required by condition 4-1. 	<ol style="list-style-type: none"> 2. Compliance Assessment Reports submitted to OEPA 3. ACAR submitted to OEPA 4. Make reports publicly available in accordance with PAG4 Post Assessment Guideline for Making information publicly available (OEPA, 2012c) 5. Completed Compliance Assessment Reports indicating changes to the CAP 	<p>Evidence</p> <ul style="list-style-type: none"> • 2023 ACAR submitted to the OEPA on the 31/08/2023 – submission email sighted. • 2023 ACAR was endorsed by the delegate of KML's CEO – the endorsed 2023 ACAR sighted. 				
806:M5.1	Performance Review and Reporting	The proponent shall submit to the CEO a Performance Review Report at the conclusion of the first, second, fourth, sixth, eighth and tenth years after the start of implementation and then, at such intervals as the CEO may regard as reasonable, which addresses		<p>Evidence</p> <p>Compilation of associated PRR.</p>	Overall	Submit to the OEPA a Performance Review Report within 2 months of the conclusion of the first, second, fourth, sixth, eighth and tenth years after the start of implementation and then, at such intervals as the OEPA may regard as reasonable.	CLD	
				<p>CAP req.</p> <ul style="list-style-type: none"> • PRR for 2010 received by OEPA on 12/01/2011 (1st Year) • PRR for 2011 received by OEPA on 4/01/2012 (2nd Year) • PRR for 2013 submitted 8th November 2013 (4th year) • PRR for 2015 sent to OEPA via e-mail on 22/01/2016 (6th Year) • PRR for 2017 to be submitted to OEPA by December 2017 (8th Year) • PRR for 2019 submitted to OEPA on 08 May 2020 (10th year) • A letter was received from DWER dated 02/06/2020 advising that the PRR on 08 May 2020, submission occurred after the tenth year of implementation. The letter also advised that it was determined that additional PRRs were not required and the requirements of Condition 5-1 had been met. <p>No PRR was required during this audit period.</p>				
806:M5.1.1	Performance Review and Reporting	... the major environmental risks and impacts; the performance objectives, standards and criteria related to these; the success of risk reduction/impact mitigation measures and results of monitoring related to management of the major risks and impacts	Compilation of associated Performance Review Reports that consider the environmental risks and impacts; the performance objectives, standards and criteria related to these; the success of risk reduction/impact mitigation measures and results of monitoring related to management of the major risks and impacts	<p>CAP req.</p> <p>Compilation of associated PRRs that consider the environmental risks and impacts; the performance objectives, standards and criteria related to these; the success of risk reduction/impact mitigation measures and results of monitoring related to management of the major risks and impacts.</p>	As above	As above	CLD	
				<p>Evidence</p> <p>No PRR required during this audit period.</p>				
806:M5.1.2	Performance Review and Reporting	...the level of progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable	Compilation of associated Performance Review Reports that consider the level of progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable	<p>CAP req.</p> <p>Compilation of associated PRRs that consider the level of progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable.</p>	As above	As above	CLD	
				<p>Evidence</p> <p>No PRR required during this audit period</p>				
806:M5.1.3	Performance Review and Reporting	...significant improvements gained in environmental management which could be applied to this and other similar projects.	Compilation of associated Performance Review Reports that identify significant improvements gained in environmental management.	<p>CAP req.</p> <p>Compilation of associated PRRs that identify significant improvements gained in environmental management.</p>	As above	As above	CLD	
				<p>Evidence</p> <p>No PRR required during this audit period</p>				
806:M5.2	Performance Review and Reporting	The proponent shall make the Performance Review Reports required by condition 5-1 publicly available in a manner approved by the CEO.	Make reports publicly available in accordance with PAG4 – Post Assessment Guideline for Making information publicly available (OEPA, 2012c)	<p>CAP req.</p> <p>PRRs made available to stakeholders, including members of the public, upon request and within 7 days of the proponent receiving the request.</p>	Overall	Within 7 days of the proponent receiving the request.	C	
				<p>Evidence</p> <ul style="list-style-type: none"> • PRRs available in KML document control system. • During the audit period, no stakeholders, including members of the public, had requested a copy of the PRR. 				
806:M6.1	Priority Ecological Community	During construction the proponent shall ensure that there is a system to delineate the area of works in order to meet the outcome of minimising the disturbance to, or loss of, the Blue Hills vegetation complex Priority Ecological Community.		<p>CAP req.</p> <ul style="list-style-type: none"> • A Ground Disturbance Process that includes measures to restrict areas of works to the delineated approved areas. • Works conducted within the delineated areas and an effective incident reporting process. 	Construction	During ground disturbing activities	C	



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			<p>Establishment and implementation of the following KML procedures prior to construction:</p> <ul style="list-style-type: none"> • Approvals Request and Ground Disturbance Procedure that includes a requirement to delineate the PEC; and • Effective incident reporting process. 	<p>Evidence</p> <ul style="list-style-type: none"> • Priority Ecological Community (PEC) protected through a number of Environmental Management System (EMS) documents and procedures, primarily through the Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004 which includes requirements when ground disturbance/clearing is proposed in close proximity to PECs, and post disturbance survey pick-up to confirm no over clearing. • AR/GD Register sighted • Sighted GDs in Filesite folder 4.4 • No breaches associated with Ground Disturbances were reported during the audit period under MS806 • Health, Safety and Environmental Inductions given to all employees and contractors includes information on ground disturbance, flora and vegetation management, dust management, feral animal management, fire management and hydrocarbon and chemical management. • No new disturbance under MS806 occurred at MIOP during the audit period. 				
806:M6.2	Priority Ecological Community	During operations, the proponent shall conduct mining and mining related activities in a manner which ensures that land clearing is kept to a minimum and adverse impacts from mining and mining related activities is managed and controlled.	Establishment and implementation of KML Environmental Management System, including key procedures for ground disturbance, flora and vegetation management, dust management, feral animal management, fire management and hydrocarbon and chemical management.	<p>CAP req.</p> <p>Review implementation of KML Environmental Management System, including key procedures for ground disturbance, flora and vegetation management, dust management, feral animal management, fire management and hydrocarbon and chemical management.</p> <p>Evidence</p> <p>KML's EMS contains the following key documents which include relevance to minimum clearing and reducing impacts and/or PEC protection from mining activities:</p> <ul style="list-style-type: none"> • Health, Safety and Environmental Inductions given to all employees and contractors includes information on ground disturbance, flora and vegetation management, dust management, feral animal management, fire management and hydrocarbon and chemical management. • Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004. • Environmental Procedure – Flora, Weeds and Plant Pathogens CORP-EN-PRO-1009 • Environmental Plan – Flora and Vegetation Health Monitoring Plan CORP-EN-PLN-1012 • Environmental Plan – Dust Management Plan CORP-EN-PLN-1010 includes management measures for mine related fugitive dust based on the KIOP's potential impact on sensitive and ecological receptors in and around the Project's footprint including the Blue Hills vegetation complex PEC within the Project area. • Environmental Procedure – Dust Monitoring CORP-EN-PRO-1005 • Environmental Procedure – Terrestrial Fauna Management CORP-EN-PRO-1010 • Environmental Plan – Environmental Waste Management CORP-EN-PLN-1013 outlines management actions of non-mineral waste generated from operations activities including management actions of hydrocarbons, hazardous wastes and other controlled wastes. • Storage and Use of Hazardous Substance Standard CORP-HS-STD-1042 • Environmental Procedure – Feral Animal Management and Monitoring CORP-EN-PRO-1050 • Environmental Management Plan CORP-EN-PLN-1020 details the framework designed to ensure KML activities are systematically assessed, monitored, and controlled in order to minimise environmental impacts and to meet legal and other requirements. • Environmental Plan – Flora and Vegetation Management CORP-EN-PLN-1011 outlines management actions for flora and vegetation, specific action for 	Operation	Ongoing	C	



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				<p>high impact (priority) flora and vegetation, and contingencies.</p> <p>Most of the above environmental plans and procedures have been reviewed and updated during the audit period and available at KML's intranet – sighted.</p> <p>The 2023 vegetation health monitoring used the current vegetation health categories in consistency with those used for monitoring since 2016 as detailed in KML's letter in response to DWER's request to provide the most accurate representation of vegetation health data since commencement of vegetation health monitoring following their audit of Condition 6.2 of MS805 and MS806 on 21/09/2021 – KML's letter to DWER on 09/11/2021 was sighted.</p>				
806:M6.3	Priority Ecological Community	At all times the proponent shall ensure that adverse impacts from other threatening processes such as fire, weeds, disease and feral animals arising from its operations is managed and controlled.	Establishment and implementation of KML Environmental Management System, including key procedures for ground disturbance, flora and vegetation management, weed management, dust management, feral animal management, fire management and hydrocarbon and chemical management.	<p>CAP req. Review implementation of KML EMS, including key procedures for ground disturbance, flora and vegetation management, weed management, dust management, feral animal management, fire management and hydrocarbon and chemical management.</p> <p>Evidence</p> <ul style="list-style-type: none"> Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004 includes requirements when ground disturbance/clearing is proposed in close proximity to PECs, and post disturbance survey pick-up to confirm no over clearing. AR/GD Register sighted Sighted GDs in Filesite folder 4.4 Environmental Plan – Dust Management Plan CORP-EN-PLN-1010 includes management measures for mine related fugitive dust based on the KIOP's potential impact on sensitive and ecological receptors in and around the Project's footprint including the Blue Hills vegetation complex PEC within the Project area. Monitoring of the flora and health of the PEC conducted as per Flora and Vegetation Health Monitoring Plan CORP-EN-PLN-1012 (Section 4.2 – Monitoring). Records of vegetation health monitoring data show regular monitoring against weeds, dust, dust suppression water overspray, fauna impact and fire impact. Induction includes education on importance of clearing control, weeds, dust, dust suppression water overspray, feral animals and fire. Sighted toolbox materials covering key environmental awareness topics. Sighted Environmental Awareness Training folder in Filesite that contains posters and toolbox and awareness training materials covering a range of key topics. Sighted posters covering key environmental awareness topics. Monitoring of weeds, fire, feral animals, dust deposition and dust suppression water overspray (as per Flora and Vegetation Health Monitoring Plan CORP-EN-PLN-1012 (Section 4 – Implementation and Operation) - sighted. Restricted access signage and rehabilitation signage in locations around site. 	Overall	Ongoing	C	
806:M6.4	Priority Ecological Community	The proponent shall develop and implement procedures and measures to restrict access to areas under its control that support the Blue Hills vegetation	Establishment and implementation of KML Environmental Management System, including key procedures for ground disturbance, flora and	<p>CAP req. Review implementation of KML EMS, including key procedures for ground disturbance Procedure, flora and vegetation, traffic management, signage restricting access and training programs.</p>	Overall	Ongoing	C	



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS806	Further information
		complex Priority Ecological Community to authorised personnel only.	vegetation, traffic management, and training programs.	<p>Evidence</p> <ul style="list-style-type: none"> Traffic Management Plan CORP-HS-PLN-1008 includes requirement for no off-road driving (vehicles to remain on identified tracks), all care to be taken to ensure flora and fauna are not affected. KML Environmental Plan – Flora and Vegetation Health Monitoring (CORP-EN-PLN1012) includes measures to assess threats and impacts to vegetation (a decline in vegetation health) related to, but not limited to dust, weeds and dust suppression overspray. It also ensures that contingency measures are in place should a decline in vegetation health monitoring results to be observed, as well as the internal and regulatory reporting requirements are addressed for management of the Blue Hills vegetation complex PEC. Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004 includes but is not limited to requirements for buffers to be established/demarcated when ground disturbance/clearing activities proposed in close proximity to PEC, demarcation of hollow logs (habitat) for rehabilitation activities, identification of significant flora and conservation-significant fauna habitat. Restricted access signage and rehabilitation signage in locations around site. 				
806:M6.5.1	Priority Ecological Community	The proponent shall monitor impacts from mining and mining related activities due to dust on the Blue Hills vegetation complex Priority Ecological Community referred to in condition 6-1. This monitoring is to be carried out to the satisfaction of the CEO	Establishment and implementation of KML Environmental Management System, including key monitoring procedures for dust, flora and fauna, traffic and training programs.	<p>CAP req.</p> <ul style="list-style-type: none"> Monitoring results associated with the Dust, Flora and fauna, traffic management and training programs in relation to the PEC in ACAR. Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA. <p>Evidence</p> <ul style="list-style-type: none"> Flora and Vegetation Health Monitoring Plan CORP-EN-PLN-1012 describes monitoring to occur in PEC. Records captured annually (September) of vegetation health monitoring data show regular monitoring against weeds, dust, feral fauna, water stress, erosion, soil salinity, vegetation health, species density and fire impact throughout the PEC at potential impact and control sites. Monitoring results for flora health, dust, saline water, erosion, feral animals and fire captured in 2024 ACAR (Section 6.4 – Flora Management). 	Overall	Ongoing	C	
806:M6.5.2	Priority Ecological Community	The proponent shall monitor impacts from mining and mining related activities due to saline water application for dust control on the Blue Hills vegetation complex Priority Ecological Community referred to in condition 6-1. This monitoring is to be carried out to the satisfaction of the CEO	Establishment and implementation of KML Environmental Management System, including key monitoring procedures for dust, saline water, flora and fauna, traffic management, and training programs.	<p>CAP req.</p> <ul style="list-style-type: none"> Monitoring results associated with the Dust, Flora and fauna, traffic management and training programs in relation to the PEC in ACAR. Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA. <p>Evidence</p> <ul style="list-style-type: none"> Refer 2024 ACAR section 6.2.4 Feral Animal Monitoring – occurs via regular inspection of landfill facilities and rehabilitated areas including fixed camera located in an area of Blue Hills PEC. Refer 2024 ACAR section 6.4.1 Vegetation Health - flora and vegetation health is conducted annually by an external consultant. Results to date show overall vegetation health at MIOP has not declined since last year's monitoring. Review of the KML Incident Management System INX In-Control and 2024 ACAR indicated no incidents of PEC vegetation health decline in relation to the use of saline water for dust suppression. 	Overall	Ongoing	C	
806:M6.5.3	Priority Ecological Community	The proponent shall monitor impacts from mining and mining related activities due to fire on the Blue Hills vegetation complex Priority Ecological Community referred to in condition 6-1. This monitoring is to be	Establishment and implementation of KML Environmental Management System, including key monitoring procedures for fire, flora and fauna, traffic management, and training programs.	<p>CAP req.</p> <ul style="list-style-type: none"> Monitoring results associated with the fire, Flora and fauna, traffic management access and training programs in relation to the PEC in ACAR. Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA. 	Overall	Ongoing	C	



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS806	Further information
		carried out to the satisfaction of the CEO		Evidence Review of INX In-Control confirmed that no fires reported during the audit period that posed a risk to the Blue Hills Vegetation Complex PEC.				
806:M6.5.4	Priority Ecological Community	The proponent shall monitor impacts from mining and mining related activities due to feral species on the Blue Hills vegetation complex Priority Ecological Community referred to in condition 6-1. This monitoring is to be carried out to the satisfaction of the CEO	Establishment and implementation of KML Environmental Management System, including key monitoring procedures for feral animals, flora and fauna, traffic management, and training programs.	CAP req. • Monitoring results associated with feral animals, Flora and fauna, traffic management and training programs in relation to the PEC in ACAR. • Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA. Evidence • Feral fauna monitoring measures described in Environment Plan - Feral Animal Management CORP-EN-PLN-1009. • Monitoring and trapping results are included in the 2024 ACAR – refer section 6.2.4.	Overall	Ongoing	C	
806:M6.6	Priority Ecological Community	In the event that the outcome of condition 6-1 is not being met or are not likely to be met, the proponent shall immediately provide and implement proposed management measures to the satisfaction of the CEO of the Department of Environment and Conservation.	Establishment and implementation of proposed management measures to the satisfaction of the CEO.	CAP req. Establishment and implementation of proposed management measures to the satisfaction of OEPA. Evidence • Review of the KML Incident Management System INX In-Control and the Environmental Incident Register found no non-compliance against MS conditions were reported during the audit period, and no incidents currently under investigation that may potentially be a non-compliance against MS Conditions. • Review of the Vegetation Health Monitoring Register did not indicate vegetation impacts that would trigger reporting to DWER and subsequent implementation of additional management controls during the reporting period.	Overall	Immediately, in the event that the outcome of condition 6-1 is not being met or are not likely to be met.	C	
806:M7.1	Groundwater dependant vegetation	The proponent shall ensure that groundwater abstraction does not adversely affect the groundwater regime which supports vegetation on the Gilgai formation.	Condition removed in accordance with OEPA advice (OEPA, 2012d).	Condition removed in accordance with OEPA advice	Requirement removed	Requirement removed	NA	As per current approved CAPs this Condition has not been audited.
806:M7.2	Groundwater dependant vegetation	The proponent shall develop ground water trigger levels for management and contingency actions prior to implementation of the proposal.	Condition removed in accordance with OEPA advice (OEPA, 2012d).	Condition removed in accordance with OEPA advice	Requirement removed	Requirement removed	NA	As per current approved CAPs this Condition has not been audited.
806:M7.3	Groundwater dependant vegetation	The proponent shall monitor groundwater levels within and near to the Gilgai (formation) against the groundwater trigger levels referred to in condition 7-2 and implement management and contingency actions in the event that groundwater trigger levels are met. This monitoring is to be carried out to the satisfaction of the CEO.	Condition removed in accordance with OEPA advice (OEPA, 2012d).	Condition removed in accordance with OEPA advice	Requirement removed	Requirement removed	NA	As per current approved CAPs this Condition has not been audited.
806:M7.4	Groundwater dependant vegetation	The proponent shall monitor the health and condition of vegetation in the Gilgai formation to demonstrate the requirements of condition 7-1 are being met. This monitoring is to be carried out to the satisfaction of the CEO.	Condition removed in accordance with OEPA advice (OEPA, 2012d).	Condition removed in accordance with OEPA advice	Requirement removed	Requirement removed	NA	As per current approved CAPs this Condition has not been audited.
806:M7.5	Groundwater dependant vegetation	In the event that the requirements of condition 7-1 are not being met or are not likely to be met, the proponent shall immediately provide and implement proposed management measures to the satisfaction of the CEO.	Condition removed in accordance with OEPA advice (OEPA, 2012d).	Condition removed in accordance with OEPA advice	Requirement removed	Requirement removed	NA	As per current approved CAPs this Condition has not been audited.



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS806	Further information
806:M8.1	Fauna protection from trenches	The proponent shall limit the length of any continuous open trench for pipelines to a maximum length of two and a half kilometers at any time.	Establishment and implementation of the following: <ul style="list-style-type: none"> Trench length limit included in contractor specifications; and Regular inspections to verify that open trenches do not exceed maximum length. 	<p>CAP req. <ul style="list-style-type: none"> Construction Trench Inspection Logs including measure of trench length open at any one time. Completion of ACAR. </p> <p>Evidence <ul style="list-style-type: none"> The requirements of these conditions are captured in the Environmental Procedure – Terrestrial Fauna CORP-EN-PRO-1010 (Section 3.8 – trenching and Excavations) and communicated to contractors via the induction. Current Licence to Take or Disturb Threatened Species (Fauna) TFA 2021-0056-2 valid until 31 January 2025) - sighted. Confirmed with Site Advisor Environment that no trenching activities were conducted at MIOP during the audit period. </p>	Overall	Ongoing	CLD	KML submitted a Pipeline Corridor Completion Fauna Report to fulfil Condition. This was received by OEPA on 9 November 2011.
806:M8.2	Fauna protection from trenches	Fauna refuges and/or ramps are to be placed in the trench at intervals not exceeding 50 meters.	Establishment and implementation of the following: <ul style="list-style-type: none"> Requirement for fauna refuges/ramps included in contractor specifications; and Inspections to verify that fauna refuges/ramps are in place at the required spacing. 	<p>CAP req. <ul style="list-style-type: none"> Construction Trench Inspection Logs including verification fauna refuges being in place at the required spacing. Copies of contractor specification documents. Completion of ACAR. </p> <p>Evidence <ul style="list-style-type: none"> Confirmed with Site Advisor Environment that no trenching activities were conducted at MIOP during the audit period. </p>	Overall	Ongoing	CLD	KML submitted a Pipeline Corridor Completion Fauna Report to fulfil Condition. This was received by OEPA on 9 November 2011.
806:M8.3	Fauna protection from trenches	The proponent shall employ at least two qualified “fauna handlers” to remove fauna from the trench. The “fauna handlers” shall be able to demonstrate suitable experience to obtain a fauna handling licence from the Department of Environment and Conservation.	Two or more fauna handlers employed during pipeline trenching activities.	<p>CAP req. <ul style="list-style-type: none"> Completion of ACAR demonstrating that the fauna handlers have suitable experience. </p> <p>Evidence <ul style="list-style-type: none"> DPaW Permits and licence Data Register sighted which verified status of at least two qualified fauna handlers with suitable experience. Email from DBCA dated 27/05/2019 advising that under Biodiversity Conservation Regulations (Regulation 50), a licence to relocate fauna from infrastructure is no longer required – email sighted Confirmed with Site Advisor Environment that no trenching activities were conducted at MIOP during the audit period. </p>	Overall	Ongoing	CLD	KML submitted a Pipeline Corridor Completion Fauna Report to fulfil Condition. This was received by OEPA on 9 November 2011.
806:M8.4	Fauna protection from trenches	Inspection and removal of fauna from trenches by fauna handlers shall occur twice daily and within half an hour prior to the backfilling of trenches, with the first daily inspection and removal to be undertaken no later than 3.5 hours after sunrise, and the second inspection and removal to be undertaken daily between the hours of 3:00 pm and 6:00 pm.	Establishment and implementation of the following: <ul style="list-style-type: none"> Construction trench Inspection Logs; and Requirements for inspection and removal of fauna by fauna handlers included in contractor specifications. 	<p>CAP req. <ul style="list-style-type: none"> Construction Trench Inspection Logs. Completion of ACAR. </p> <p>Evidence <ul style="list-style-type: none"> Confirmed with Site Advisor Environment that no trenching activities were conducted at MIOP during the audit period. </p>	Overall	Twice daily and within half an hour prior to the backfilling of trenches, with the first daily inspection and removal to be undertaken no later than 3.5 hours after sunrise, and the second inspection and removal to be undertaken daily between the hours of 3:00 pm and 6:00 pm.	CLD	



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806:M8.5	Fauna protection from trenches	In the event of significant rainfall, the proponent shall, following the removal of fauna from the trench, pump out pooled water in the open trench (with the exception of groundwater) and discharge it via a mesh (to dissipate energy) to adjacent areas.	Establishment and implementation of the following: <ul style="list-style-type: none"> Construction trench inspection logs, and Requirements in the event of significant rainfall included in contractor specifications. 	CAP req. <ul style="list-style-type: none"> Construction Trench Inspection Logs. Copies of contractor specification documents. Completion of ACAR. 	Overall	In the event of significant rainfall, following the removal of fauna from the trench.	CLD	KML submitted a Pipeline Corridor Completion Fauna Report to fulfil condition 805:M8.6. This was received by the OEPA on 9/11/2011.
				Evidence <p>Confirmed with Site Advisor Environment that no trenching activities were conducted at MIOP during the audit period.</p>				
806:M8.6	Fauna protection from trenches	Within 14 days following completion of the construction of each pipeline, the proponent shall provide a report on removed fauna and fauna deaths, within the pipeline corridor to the CEO.	Compile Report detailing removed fauna and fauna death occurrences, within pipeline trenches within 14 days following completion of the construction of each pipeline.	CAP req. <ul style="list-style-type: none"> Construction Trench Inspection Logs. Copies of contractor specification documents. Completion of ACAR. 	Overall	Provide report to OEPA within 14 days of completion of the construction of each pipeline.	CLD	KML submitted a Pipeline Corridor Completion Fauna Report to fulfil condition 805:M8.6. This was received by the OEPA on 9/11/2011.
				Evidence <p>Confirmed with Site Advisor Environment that no trenching activities were conducted at MIOP during the audit period.</p>				
806:M9.1	Fauna mortality register	The proponent shall prepare and implement strategies to avoid fauna deaths in areas of mining or mining related activities.	Preparation and implementation of strategies to avoid fauna deaths, including Western Spiny-tailed skink, Malleefowl and Shield-backed Trapdoor Spider management and monitoring procedures.	CAP req. <ul style="list-style-type: none"> Fauna monitoring results. Statistics recorded in Fauna Mortality register. Western Spiny-tailed skink, Malleefowl and Shield-backed Trapdoor Spider management and monitoring procedures. Completion of ACAR. 	Overall	Ongoing	C	



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS806	Further information
				<p>Evidence</p> <ul style="list-style-type: none"> • Environmental Plan – Fauna Management CORP-EN-PLN-1008 • Environmental Procedure – Terrestrial Fauna Management CORP-EN-PRO-1010 • Environmental Plan - Feral Animal Management CORP-EN-PLN-1009 • Environmental Procedure - Malleefowl Management and Monitoring CORP-EN-PRO-1035 • Environmental Procedure - Shield-backed Trapdoor Spider Management and Monitoring CORP-EN-PRO-1025 • Environmental Procedure - Western Spiny-tailed Skink Management and Monitoring CORP-EN-PRO-1024 • Traffic Management Plan CORP-HS-PLN-1008 requires vehicles to travel on existing tracks/roads (no off-road travel), slow down in areas signposted where Malleefowl have been sighted and to maintain designated speed limits • Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004 includes but is not limited to requirements for buffers to be established/demarcated when ground disturbance/clearing activities proposed in close proximity to PEC and active Malleefowl mounds, demarcation of hollow logs (habitat) for rehabilitation activities, identification of conservation-significant fauna habitat. • Pre-ground inspection form includes checklist items that require area to be inspected for Malleefowl mounds, inspection of known WStS habitat, Shield-backed Trapdoor Spider burrow. • Site Advisor Environment confirmed that signage exists around site of where Malleefowl are active, wildlife crossing - signs on roads. Locations of the signage are on K-Maps and a Fauna Register maintained on Filesite – sighted. Posters, Toolbox Print-outs and sighting forms located across site, Toolbox talks run annually and fauna management is included in the environmental induction to site personnel – current environmental awareness materials for site induction is sighted. • Examples of a Malleefowl, Shield-Backed Trapdoor Spider and Spiny Tailed Skink and other environmental awareness materials/poster sighted at site office and crib room. • KML Fauna Register which includes records of fauna mortalities – sited on Filesite. • Fauna deaths and trapping data reported in 2024 ACAR (Section 6.2.4 and 6.3). 				
806:M9.2	Fauna mortality register	Prior to ground disturbing activity the proponent shall prepare and implement a Fauna Mortality Register for conservation significant species in the proposal area.	Preparation and implementation of a Fauna Mortality register.	<p>CAP req.</p> <ul style="list-style-type: none"> • Fauna Mortality Register. • Completion of ACAR. <p>Evidence</p> <ul style="list-style-type: none"> • Sighted KML Fauna Mortality register – register in use and up to date • Fauna deaths and trapping data reported in 2024 ACAR (Section 6.2.4 and 6.3). 	Design	Prior to ground disturbing activity.	CLD	



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS806	Further information
806:M9.3	Fauna mortality register	The proponent shall submit the strategies required by condition 9-1 to the CEO of the Department of Environment and Conservation	Submission to OEPA of key plans and strategies, including Western Spiny tailed skink, Malleefowl and Shield-backed Trapdoor Spider management and monitoring procedures.	<p>CAP req.</p> <ul style="list-style-type: none"> Correspondence to OEPA associated with submitting and complying with plans and procedures. Completion of ACAR. <p>Evidence</p> <ul style="list-style-type: none"> OEPA approval letter dated 13/01/2014 states that "if there are any changes to the Plans that would substantially affect the management actions or targets, the amended Plans would require submittal to the OEPA." Environmental Procedure - Western Spiny-tailed Skink Management and Monitoring CORP-EN-PRO-1024 and Environmental Procedure – Malleefowl Management and Monitoring CORP-EN-PRO-1035 were reviewed and updated in April 2022. However, only minor changes were made to the two procedures, which were unlikely to substantially affect the management actions or targets – updated version (Rev 5) of both procedures sighted. The updated procedures with table of changes were submitted to the DBCA and DAWE (now 'DCCEEW') – refer below. Malleefowl and Western Spiny-tailed Skink are regulated under EPBC Act approval for the project. Updated Environmental Procedure - Western Spiny-tailed Skink Management and Monitoring CORP-EN-PRO-1024 (Rev 5) and Environmental Procedure – Malleefowl Management and Monitoring CORP-EN-PRO-1035 (Rev 5) were submitted to the DBCA and DAWE on 13/04/2022 in accordance with Condition 7 of the EPBC approval (2006/3017) and updated procedures requirements – emails to the regulators sighted. The most recent Shield-backed Trapdoor Spider Monitoring occurred in 2019, no monitoring occurred in 2020, 2021 and 2022. Site Advisor Environment advised that spider monitoring has been discontinued following re-classification of the species. 	Design	Prior to ground disturbing activity.	CLD	
806:M9.4	Fauna mortality register	The proponent shall review and revise the strategies required by condition 9-1 as required by the CEO of the Department of Environment and Conservation	Review and revise plans in accordance with comments received from OEPA, in consultation with the Department of the Environment if comments affect management plans approved under the <i>Environment Protection and Biodiversity Conservation Act 1999</i>	<p>CAP req.</p> <p>The reviewed versions of the plans and procedures and associated document control information, identifying reason for revision of procedure (if situation arises that requires plans and procedures to be reviewed).</p> <p>Evidence</p> <ul style="list-style-type: none"> OEPA approval letter dated 13/01/2014 states that "if there are any changes to the Plans that would substantially affect the management actions or targets, the amended Plans would require submittal to the OEPA." Environmental Procedure - Western Spiny-tailed Skink Management and Monitoring CORP-EN-PRO-1024 and Environmental Procedure – Malleefowl Management and Monitoring CORP-EN-PRO-1035 were reviewed and updated in April 2022. However, only minor changes were made to the two procedures, which were unlikely to substantially affect the management actions or targets – updated version (Rev 5) of both procedures sighted. The updated procedures with table of changes were submitted to the DBCA and DAWE (now 'DCCEEW') – refer to evidence in audit code 805:M10.3. No request for plan revisions received from the EPAS during the audit period. 	Overall	As required by OEPA	C	



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS806	Further information
806:M10.1	Conservation significant reptiles	Prior to ground disturbing activities the proponent shall carry out field surveys for conservation significant reptile species.	Conduct pre – ground disturbance inspection for conservation significant reptile species.	<p>CAP req. Survey Report. Completion of ACAR.</p> <p>Evidence</p> <ul style="list-style-type: none"> Environmental Procedure – Approvals Request and Ground Disturbance CORP-EN-PRO-1004 requires a pre ground disturbance site inspection to be carried out which includes identification of conservation significant flora and fauna habitat, hollow logs for use in rehabilitation activities, demarcation of boundaries/avoidance sites as required. Environmental Procedure – Approvals Request and Ground Disturbance CORP-EN-PRO-1004 requires a pre ground disturbance site inspection (Section 4.4. Pre - Ground Disturbance Inspection) to be carried out which includes inspection for all known Western Spiny-tailed Skink habitats and scat locations inspected to ensure there are no skinks in the area of clearing (Pre Ground Disturbance Site Inspection Form CORP-EN-FRM-1027). Western Spiny-tailed Skink Monitoring Register contains monitoring data from 2011-present – sighted. Site Advisor Environment confirmed that a check for Western Spiny-tailed Skinks occurs as part of the process prior to a ground disturbance permit issued. WStS monitoring was completed in 2023. Refer section 6.2.1 of 2024 ACAR. 	Overall	Prior to ground disturbing activities.	C	
806:M10.2	Conservation significant reptiles	Should any conservation significant reptile species be located, these shall be re-located into areas of suitable habitat in an area safe from disturbance from mining and associated operations.	Establishment and implementation of the Environmental Management System to effectively address significant reptile species, including the western Spiny-tailed Skink and associated Western Spiny-tailed Skink Translocation plans.	<p>CAP req. Adherence to avoidance principles outlined in management plans and content associated with Compliance Assessment Report.</p> <p>Evidence</p> <ul style="list-style-type: none"> Environmental Procedure – Approvals Request and Ground Disturbance CORP-EN-PRO-1004 (Section 4.3.2 GD Boundaries and Buffer Zones) requires a standard 50m buffer to be applied to avoidance sites on GD map (unless otherwise advised by the Environment Department) for conservation significant flora/fauna including habitats, PECs, heritage sites etc. Procedure also requires a Ground Disturbance Release Form CORP-EN-FRM-1014 to be completed and a pre-GD inspection to be completed within 2 weeks prior to clearing commencing. Avoidance Site boundaries have been surveyed and marked out in the field by a competent surveyor prior to any ground disturbance activities using red and white striped flagging tape for flora and fauna sites. That if any clearing is required within 10m of the Ground Disturbance Boundary, the clearing works must be supervised by a spotter. All Avoidance Sites, Ground Disturbance Boundaries and field markings have been communicated and are clearly understood by the Contractor Supervisor, Equipment Operator/s and Spotter. No translocation of conservation significant reptiles occurred at MIOP during the audit period. Review of KML Incident Management System INX In-Control indicated no occurrences of Western Spiny-tailed Skink mortalities during the audit period. 	Overall	When conservation significant reptile species are located.	C	
806:M10.3	Conservation	Relocation of conservation significant reptile species	Lodging of “Permits to Take” under the <i>Wildlife</i>	<p>CAP req. Annual reporting on monitoring and translocation of significant reptile species, including the Western Spiny-tailed Skink results</p>	Overall	In the event that	C	



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	significant reptiles	as required by condition 11-3 (condition 10-2 for 806:M10.3) shall be carried out to the requirements of the CEO of the Department of Environment and Conservation.	<i>Conservation Act</i> to seek approval for translocation of conservation significant reptile species [805] Establishment and implementation of the Environmental Management System to effectively address significant reptile species, including the Western Spiny Tailed Skink Management, Monitoring and Translocation Procedure [806].	Evidence <ul style="list-style-type: none"> Translocation sites regularly monitored as shown in Western Spiny-tailed Skink Monitoring Register and monitoring results are reported in ACAR. Refer section 6.2.1 of 2024 ACAR. Translocation procedure described in Environmental Procedure - Western Spiny-Tailed Skink Management, Monitoring and Translocation CORP-EN-PRO-1024 (Section 4.4). Translocation procedure described in Environmental Procedure - Western Spiny-Tailed Skink Management, Monitoring and Translocation CORP-EN-PRO-1024 (Section 4.4). Skink potential translocation sites viewed on KML's GIS and shown to be at least 6km away from any mining areas. No translocation of conservation significant reptiles occurred at MIOP during audit period. 		condition 10-2 cannot be achieved		
806:M11.1.1.a	Mine Closure and Rehabilitation	As mining progresses, the proponent shall commence progressive rehabilitation of the mine site area in accordance with the following: re-establishment of vegetation in the rehabilitation area	Establishment of the progressive rehabilitation procedure, rehabilitation monitoring procedure and adherence to rehabilitation targets. Submittal of Rehabilitation Schedule to OEPA and	CAP req. <ul style="list-style-type: none"> Correspondence with OEPA and DMP associated with submission and acceptance of rehabilitation schedule. Rehabilitation Monitoring Results. Completion of ACAR. 	Overall	As mining progresses	NC	Mining at MIOP ceased in September 2014. Although the species diversity recorded at individual quadrats below the target of



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Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS806	Further information
		to be comparable with that of the pre-mining vegetation such that the following criteria are met within five years following the cessation of productive mining: flora and vegetation are re-established with not less than 70 percent species composition (not including weed species).	Director Environment of the Department of Mines and Petroleum in Annual Environmental Report.	<p>Evidence</p> <ul style="list-style-type: none"> Progressive rehabilitation committed to in Environmental Management Plan CORP-EN-PLN-1020. KML maintains a rehabilitation schedule CORP-EN-SCH-1006 which was submitted to and approved by the DWER 30 August 2013, and further revised and submitted to DWER in April 2020. DWER advised that the current rehabilitation schedule remained under assessment in September 2021. Commitment (flora and vegetation are re-established with not less than 70 percent species composition) captured in Environmental Procedure - Rehabilitation Performance Monitoring CORP-EN-PRO-1040 - 2024 ACAR includes data on the progress to targets (70% composition and 10% weeds) (Section 6.5 Rehabilitation). DWER previously identified a Non-Compliance in March 2020 relating to condition 11-1 of MS806 as 70% species composition at MIOP had not been achieved within 5 years of the cessation of mining. DWER identified this as a non-compliance again on 21 September 2021 and requested KML to continue to rehabilitate the site in order to achieve the 70% species composition at MIOP. An average of 70% species composition was achieved for MIOP as a whole for the area, however 70% for each individual area was not achieved, 1x site (BHNWD01 recording 53.07%). Compliance for this condition has not been achieved. It should be noted that although the species diversity recorded at BHNWD01 is still below the target of 70%, an average species density of 89% for all Blue Hill North WRD rehabilitation quadrats was achieved across nine years of monitoring. The 70% diversity target is calculated by comparing the Shannon Diversity index of the analogue site with the Shannon Diversity index of the rehabilitation quadrats. The 70% species composition target within the BHNWD01 quadrat has been falling since 2018 to below the target in the last five years. During the reporting period the species diversity index recorded at this quadrat has slightly decreased from 0.99 in 2022 to 0.87 in 2023. The decrease in the diversity Shannon index at BHNWD01 could be potentially associated with a significant increase in abundance of one species in particular (<i>Maireana trichoptera</i>) as 116 individuals were recorded in 2022, while that 409 individuals were recorded in 2023, this quadrat also recorded higher death rates of <i>Acacia ramulosa</i> species and some non-chenopod shrubs. It should be noted that the Shannon diversity index measures not only the species diversity, but also the evenness in the number of individuals from different species across the quadrat. 				70%, an average of 70% species composition was achieved for MIOP as a whole for the area across eight years of monitoring.
806:M11.1.1.b	Mine Closure and Rehabilitation	As mining progresses, the proponent shall commence progressive rehabilitation of the mine site area in accordance with the following: re-establishment of vegetation in the rehabilitation area to be comparable with that of the pre-mining vegetation such that the following criteria are met within five years following the cessation of productive mining: weed coverage consistent with recorded baseline levels or 10 percent, whichever is less.	Establishment of the progressive rehabilitation procedure, rehabilitation monitoring procedure and adherence to rehabilitation targets. Submittal of Rehabilitation Schedule to OEPA and Director Environment of the Department of Mines and Petroleum in Annual Environmental Report.	<p>CAP req.</p> <ul style="list-style-type: none"> Correspondence with OEPA and DMP associated with submission and acceptance of rehabilitation schedule. Rehabilitation Monitoring Results. Completion of ACAR. <p>Evidence</p> <ul style="list-style-type: none"> Progressive rehabilitation committed to in Environmental Management Plan CORP-EN-PLN-1020. KML maintains a rehabilitation schedule CORP-EN-SCH-1006 which was submitted to and approved by the DWER 30 August 2013, and further revised and submitted to DWER in April 2020. DWER advised that the current rehabilitation schedule remained under assessment in September 2021. Refer section 6.5.3 and 6.5.4 of 2024 ACAR – during the reporting period, all of the 13 MIOP monitoring sites recorded weed percentage cover of less than 1%. 	Overall	As mining progresses	C	



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806:M11.1.2	Mine Closure and Rehabilitation	As mining progresses, the proponent shall commence progressive rehabilitation of the mine site area in accordance with the following: A schedule of the rate of rehabilitation acceptable to the CEO of the Department of Environment and Conservation, and the Director Environment of the Department of Mines and Petroleum	Establishment of the progressive rehabilitation procedure, rehabilitation monitoring procedure and adherence to rehabilitation targets. Submittal of Rehabilitation Schedule to OEPA and Director Environment of the Department of Mines and Petroleum in Annual Environmental Report.	<p>CAP req.</p> <ul style="list-style-type: none"> Correspondence with OEPA and DMP associated with submission and acceptance of rehabilitation schedule. Rehabilitation Monitoring Results. Completion of ACAR. <p>Evidence</p> <ul style="list-style-type: none"> Progressive rehabilitation committed to in Environmental Management Plan CORP-EN-PLN-1020. KML maintains a rehabilitation schedule CORP-EN-SCH-1006 which was submitted to and approved by the DWER 30 August 2013, and further revised and submitted to DWER in April 2020. DWER advised that the current rehabilitation schedule remained under assessment in September 2021. 2024 ACAR includes detail on Rehabilitation (section 6.5). 	Overall	As mining progresses	C	
806:M11.2.1	Mine Closure and Rehabilitation	Within six months following the cessation of mining, the proponent shall take measures, as agreed with the CEO of the Department of Environment and Conservation and Director Environment of the Department of Mines and Petroleum, to ensure that permanent standing water within the pit void does (do) not result in an increase in feral fauna to a level that may have a measurable impact on native fauna or native flora on the Blue Hills Range in the vicinity of the project (proposal) area as compared to monitoring results obtained during mining.	This condition will be assessed following cessation of mining operations.	<p>CAP req.</p> <ul style="list-style-type: none"> Correspondence between KML, OEPA and DMP. Measures and reports containing monitoring results required by M11-2 Completion of ACAR. <p>Evidence</p> <ul style="list-style-type: none"> Cessation of productive mining confirmed at Blue Hills North as 21/07/2013 and Terapod at 25/03/2014. Despite ongoing utilisation of laydown areas and Blue Hills North pit for dewatering purpose for KIOP operations, the Department advised that mining is still considered to have ceased and therefore there is the requirement to implement rehabilitation requirements. Environmental Procedure - Feral Animal Management and Monitoring CORP-EN-PRO-1050 addresses how feral animals will be controlled and monitored. 2024 ACAR – refer section 6.2.4 Feral Animal Monitoring which details the feral animal monitoring, sightings, and trapping records. Sightings have remained generally consistent over the years, which will provide baseline data for comparison following the cessation of mining at KIOP. 	Closure	Within six months following the cessation of mining.	C	
806:M11.2.2	Mine Closure and Rehabilitation	Within six months following the cessation of mining, the proponent shall monitor and record feral animal populations on the Blue Hills Range in the vicinity of the project (proposal) area at least once each calendar year for seven years.	This condition will be assessed following cessation of mining operations.	<p>CAP req.</p> <ul style="list-style-type: none"> Correspondence between KML, OEPA and DMP. Measures and reports containing monitoring results required by M11.2 Completion of ACAR. <p>Evidence</p> <ul style="list-style-type: none"> Environmental Procedure - Feral Animal Management and Monitoring CORP-EN-PRO-1050 addresses how feral animals will be controlled and monitored. 2024 ACAR – refer section 6.2.4 Feral Animal Monitoring which details the feral animal monitoring, sightings, and trapping records. Sightings of feral animals has varied slightly over the past three reporting periods, the number of cats sighted has remained stable compared to last reporting period. No goats or foxes were sighted during this reporting period, possibly due to seasonal factors while the number of wild dogs/dingos sighted has increased by 4 in respect to the last year's reporting period. Active mining at MIOP ceased in September 2014. Monitoring conducted in Spring 2022 marked the seventh and final year of monitoring. This Condition has now been considered 'closed'. 	Closure	Within six months following the cessation of mining for seven years.	CLD	



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806:M11.2.3	Mine Closure and Rehabilitation	Within six months following the cessation of mining, the proponent shall monitor and record Declared Rare Flora and Priority Flora species and vegetation condition as defined by Keighery (1994) on the Blue Hills Range in the vicinity of the project (proposal) area at least once each calendar year during spring for seven years.	This condition will be assessed following cessation of mining operations.	<p>CAP req.</p> <ul style="list-style-type: none"> Correspondence between KML, OEPA and DMP. Measures and reports containing monitoring results required by M11.2 Completion of ACAR. <p>Evidence</p> <ul style="list-style-type: none"> 2024 ACAR - refer section 6.4.1 Vegetation Health – monitoring of flora and vegetation (including DRF and PEC) health is conducted annually by an external consultant. Results to date show overall vegetation health at MIOP has not declined. An average of 70% species composition target was achieved for MIOP as a whole for the area, however 70% target for each individual area was not achieved (i.e. 53.07% was recorded at BHNWD01). During the reporting period, the diversity index recorded at this quadrat has slightly decreased from 0.99 in 2022 to 0.87 in 2023. The decrease in the diversity Shannon index at BHNWD01 could be potentially associated with a significant increase in abundance of one species in particular (<i>Maireana trichopteran</i>) as 116 individuals were recorded in 2022, while that 409 individuals were recorded in 2023, this quadrat also recorded higher death rates of <i>Acacia ramulosa</i> species and some non-chenopod shrubs Active mining at MIOP ceased in September 2014. Monitoring conducted in Spring 2021 marked the seventh and final year of monitoring. This Condition has now been considered 'closed'. 	Closure	Within six months following the cessation of mining.	CLD	
806:M11.2.4	Mine Closure and Rehabilitation	Within six months following the cessation of mining, the proponent shall report the results of the monitoring to the CEO of the Department of Environment and Conservation, and the Director Environment of the Department of Mines and Petroleum, as part of the annual compliance reporting under condition 4.	This condition will be assessed following the cessation of mining.	<p>CAP req.</p> <ul style="list-style-type: none"> Correspondence between KML, OEPA and DMP. Measures and reports containing monitoring results required by M11.2 Completion of ACAR. <p>Evidence</p> <ul style="list-style-type: none"> 2024 ACAR – refer section 6.2.4 Feral Animal Monitoring which details the feral animal monitoring, sightings, and trapping records. Sightings have remained generally consistent over the years. 2024 ACAR - refer section 6.4.1 Vegetation Health – monitoring of flora and vegetation (including DRF and PEC) health is conducted annually by an external consultant. Results to date show overall vegetation health at MIOP has not declined. 2024 ACAR includes detail on Rehabilitation (section 6.5). 	Closure	Within six months following the cessation of mining.	C	
806:M11.3	Mine Closure and Rehabilitation	Within five years of the cessation of mining, the proponent shall determine and provide a report on the long term management of the pit lake to the satisfaction of the Minister for Environment and Minister for Mines and Petroleum in liaison with the Department of Environment and Conservation and the Department of Mines and Petroleum.	This condition will be assessed following the cessation of mining.	<p>CAP req.</p> <ul style="list-style-type: none"> Report prepared and submitted to OEPA and DMP. Correspondence between KML, OEPA and DMP associated with approval of the report. Completion of ACAR <p>Evidence</p> <ul style="list-style-type: none"> The Mungada Iron Ore Project Post-Closure Pit Lake Management Plan was submitted to DWER on 27/09/2019 (DWERDT207175). The MIOP Pit Lake Management Plan was further revised and resubmitted to DWER, DBCA and DMIRS (now 'DEMIRS') for endorsement on 05/03/2021 – sighted. In a meeting with DWER on 10 September 2021 DWER advised that the MIOP Pit Lake Management Plan remained under assessment. Blue Hills North pit is not closed as it is currently used to receive pit water from KIOP operations. Terapod West pit has also been approved to be used for disposal and storage of pit water from KIOP operations when Blue Hills North pit reaches its capacity. DWER-EPAS confirmed the proposed dewatering to Terapod West pit has no issues with the MIOP Pit Lake Management Plan currently under DWER's review. 	Closure	Within five years of the cessation of mining.	C	
806:M11.4	Mine Closure	In liaison with the Department of Environment and	Progressive monitoring of rehabilitation.	<p>CAP req.</p> <ul style="list-style-type: none"> Report on rehabilitation monitoring results submitted to OEPA and DMP 	Overall	Ongoing	C	



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STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS806	Further information
	and Rehabilitation	Conservation and the Department of Mines and Petroleum, the proponent shall monitor progressively the performance of rehabilitation required by condition 11-1 based on annual reporting.	Establishment and implementation of plans and procedures to address progressive rehabilitation and rehabilitation monitoring, including rates of rehabilitation.	Evidence <ul style="list-style-type: none"> 2022 ACAR includes detail on Rehabilitation (section 6.5). 2022 ACAR was submitted to DWER on 31/08/2022 – email sighted. Rehabilitation monitoring results were submitted in the AER to DMIRS (now 'DEMIRS') via EARS2 on 31/08/2023 – 2023 AER sighted in EARS2. Rehabilitation monitoring is conducted annually in September. KML Rehabilitation Data Register sighted and most recent monitoring dated September 2023. Rehabilitation monitoring results are submitted to DWER and DMIRS (now 'DEMIRS') in 2024 in ACAR and AER respectively. 				
806:M11.5	Mine Closure and Rehabilitation	The proponent shall submit annually a report of the rehabilitation performance monitoring required by condition 11-4 to the CEO of the Department of Environment and Conservation and the Director Environment of the Department of Mines and Petroleum.	Preparation and submission of rehabilitation performance monitoring reports.	CAP req. Rehabilitation performance monitoring reports and correspondence showing evidence of submission to OEPA and DMP on an annual basis Evidence <ul style="list-style-type: none"> 2023 ACAR includes detail on Rehabilitation (section 6.5). 2023 ACAR was submitted to DWER on 31/08/2023 – email sighted. Rehabilitation details were submitted in the AER to DMIRS (now 'DEMIRS') via EARS2 on 31/08/2023 – 2023 AER sighted in EARS2. Rehabilitation monitoring is conducted annually in September. KML Rehabilitation Data Register sighted and most recent monitoring dated September 2023. Rehabilitation monitoring results are submitted to DWER and DMIRS (now 'DEMIRS') in 2024 in ACAR and AER respectively. 	Overall	31 August Annually	C	
806:M11.6	Mine Closure and Rehabilitation	The proponent shall make the reports required condition 11-2 and 11-4 publicly available in a manner approved by the CEO of the Department of Environment and Conservation.	Make reports publicly available in accordance with PAG4 – Post Assessment Guideline for Making information publicly available (OEPA, 2012c).	CAP req. Make reports available to stakeholders, including members of the public, upon request and within 7 days of the proponent receiving the request Evidence The MIOP rehabilitation monitoring information is detailed in Section 6.5.3 and 6.5.4 of 2023 ACAR, which is available in KML document control system and on KML's website available to the public members.	Overall	Within 7 days of the proponent receiving the request.	C	

APPENDIX D: MS968 STATEMENTS OF COMPLIANCE AND AUDIT TABLE

Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	HINGE IRON ORE PROJECT
Statement Number	968
Proponent Name	Karara Mining Limited
Proponent's Australian Company Number (where relevant)	ACN 070 871 831

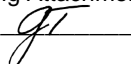
2. Statement of Compliance Details

Reporting Period	4/06/23 to 3/06/24
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Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input type="checkbox"/>	Construction	<input type="checkbox"/>	Operation	<input type="checkbox"/>	Decommissioning	<input checked="" type="checkbox"/>

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	2
<p>An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table must be prepared and maintained in accordance with the Department of Water and Environmental Regulation (DWER) <i>Post Assessment Guideline for Preparing an Audit Table</i>, as amended from time to time. The 'Status Column' of the audit table must accurately describe the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms that may be used by the proponent in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.</p>	

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)		
No (please proceed to Section 3)	<input type="checkbox"/>	Yes (please proceed to Section 4) <input checked="" type="checkbox"/>

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.
INITIALS: _GT_ 

3. Details of Non-compliance(s) and/or Potential Non-compliance(s)

The information required Section 3 must be provided for each non-compliance or potential non-compliance identified during the reporting period covered by this Statement of Compliance.

Non-compliance/potential non-compliance 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?
Was the implementation condition or procedure non-compliant or potentially non-compliant?
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally Date _____ <input type="checkbox"/> Reported to DWER in writing Date _____	<input type="checkbox"/> No

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)
What was the cause(s) of the non-compliance or potential non-compliance?
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: <ul style="list-style-type: none"> • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. (the above information may be provided as an attachment to this Statement of Compliance)

For additional non-compliance or potential non-compliance, please duplicate this page as required.

4. Proponent Declaration

I, Gaomai Trench (General Manager HSEC), (*full name and position title*) declare that I am authorised on behalf of Karara Mining Limited (*being the person responsible for the proposal*) to submit this form and that the information contained in this form is true and not misleading.

Signature: gaomai Trench Date:30/08/2024.....

Please note that:

- it is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give or cause to be given information that to his knowledge is false or misleading in a material particular; and
- the Chief Executive Officer of the DWER has powers under section 47(2) of the *Environmental Protection Act 1986* to require reports and information about implementation of the proposal to which the statement relates and compliance with the implementation conditions.

5. Submission of Statement of Compliance

One hard copy and one electronic copy (preferably PDF on CD or thumb drive) of the Statement of Compliance are required to be submitted to the Chief Executive Officer, DWER, marked to the attention of Manager, Compliance (Ministerial Statements).

Please note, the DWER has adopted a procedure of providing written acknowledgment of receipt of all Statements of Compliance submitted by the proponent, however, the DWER does not approve Statements of Compliance.

6. Contact Information

Queries regarding Statements of Compliance, or other issues of compliance relevant to a Statement may be directed to Compliance (Ministerial Statements), DWER:

Manager, Compliance (Ministerial Statements)

Department of Water and Environmental Regulation

Postal Address: Locked Bag 10
Joondalup DC
WA 6919

Phone: (08) 6364 7000

Email: compliance@dwer.wa.gov.au

7. Post Assessment Guidelines and Forms

Post assessment documents can be found at www.epa.wa.gov.au

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

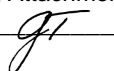
INITIALS: _GT GT

ATTACHMENT 1

Table 1 Compliance Status Terms

Compliance Status Terms	Abbrev	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: <ul style="list-style-type: none"> ongoing requirements that have been met during the reporting period; and requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: <ul style="list-style-type: none"> audit elements have a finite period of application (e.g. construction activities, development of a document); the action has been satisfactorily completed; and the DWER has provided written acceptance of 'completed' status for the audit element.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	<p>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</p> <p>The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).</p>

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

INITIALS: _GT 



AUDIT TABLE

PROPOSAL: Hinge Iron Ore Project (HIOP)
STATEMENT: 968

Note:

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the Minister's Statement for full detail/precise wording of individual elements.
- Code prefixes: M = Minister's condition, P = Proponent's commitment.
- Acronyms list: CEO = Chief Executive Officer of OEPA; DEC = Department of Environment Regulation; DPAW = Department of Parks and Wildlife; DIA = Department of Indigenous Affairs; DMP = Department of Mining and Petroleum; DWER = Department of Water and Environmental Regulation; EPA = Environmental Protection Authority; DoH = Department of Health; DoW = Department of Water, Minister for Env = Minister for the Environment; OEPA = Office of the Environmental Protection Authority.
- Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non – compliant, NR = Not Required at this stage. Please note the terms VR = Verification Required and IP = In Process are only for OEPA use.

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS968	Further information
968:M1.1	Proposal Information	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Column 3 of Table 2 in Schedule 1, unless amendments to the proposal and the authorised extent of the proposal has been approved under the EP Act.	Project implemented in accordance with these criteria	CAP req. Project implemented in accordance with this criteria through the ACAR Evidence <ul style="list-style-type: none"> No disturbance has occurred throughout the reporting period within the extent authorised by MS968. A review of KMLs disturbance database confirmed no new disturbance during the audit period. Review of the KML's GIS database verified that the proposal development has occurred within the extent of the proposal as outlined in Column 3 of Table 2 of MS968. MS968 implemented in accordance with Table 2: <ul style="list-style-type: none"> Disturbance footprint within approved footprint (Total disturbance = 165.58ha. GIS check) Mine disturbance envelope clearing to date of (148.22ha) Haul road disturbance envelope clearing to date (17.4ha) A total of 29.57ha of FCTs (1-6, 10, 12 only) cleared to date. 	Overall	Ongoing	C	
968: M2.1	Contact Details	The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Letter notifying OEPA of any change in proponent details	CAP req. <ul style="list-style-type: none"> Commencement of project works by the proponent Letter notifying OEPA of any change in proponent details Evidence <ul style="list-style-type: none"> The Proponent details are consistent with the company details on the KML website (Karara Mining) (https://www.kararamining.com.au/#) KML notified DWER via email 25/06/2020 of change of address details (change of building floor only). DWER acknowledged change of address details via return email 25/06/2020 – email sighted. 	Overall	Within 28 days of such change	C	
968: M3.1	Time Limit of Authorisation	The proponent shall not commence implementation of the proposal after the expiration of five (5) years from the date of this Statement, and any commencement, within this five (5) year period, must be substantial.	Commencement of Project Works	CAP req. Construction commenced in June 2014 with active mining operations commencing in October 2014. Evidence Audited as compliant in previous audit period, no further action is required.	Overall	Approval void 4 June 2019 if project not substantially commenced	CLD	
968: M3.2	Time Limit of Authorisation	Any commencement of implementation of the proposal, within five (5) years from the date of this Statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of five (5) years from the date of this assessment	The ACAR shall indicate that the proposal has substantially commenced	CAP req. The ACAR shall indicate that the proposal has substantially commenced on or before the expiration of five years from the date of this statement Evidence Audited as compliant in previous audit period, no further action is required.	Construction	Provide letter to OEPA on or before 4 June 2019	CLD	
968:M4.1	Compliance Reporting	The proponent shall prepare and maintain a CAP to the satisfaction of the CEO.	Preparation and submission of a CAP. CAP approved by the CEO	CAP req. <ul style="list-style-type: none"> The preparation of a CAP Advice from OEPA advising that the CAP is satisfactory 	Overall	In accordance with 968:M4.2	C	



AUDIT TABLE

PROPOSAL: Hinge Iron Ore Project (HIOP)
STATEMENT: 968

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS968	Further information
				Evidence <ul style="list-style-type: none"> Correspondence received from OEPA (dated 21/08/2014) stating CAP submitted with letter dated 11/07/2014, meets the requirements of Condition 4-2. The latest version of CAP for HIOP (Revision 2, dated 16/06/2020) sighted. CAP (Revision 2) was submitted to EPA on 14/07/2020 - email sighted. The revision of the CAP has been made to reflect current Ministerial Statement conditions and incorporate relevant recommendations from the 2019 Annual Compliance Assessment Report; and in particular, to update the CAPs to include a definition of Potential Non-compliance, to be consistent with the OEPA (2012) Post Assessment Guidelines. Letter received from DWER 30/07/2020 advising that the revised CAPs meet the requirements of Condition 4-1 of the Ministerial Statement – sighted. 				
968: M4.2	Compliance Reporting	The proponent shall submit to the CEO the compliance assessment plan required by condition 4-1 at least six (6) months prior to the first ACAR required by condition 4-6, prior to implementation, whichever is sooner.	Prepare a Compliance Assessment Plan (CAP). CAP reviewed and updated as appropriate over the life of the Project	CAP req. The preparation of a CAP Evidence <ul style="list-style-type: none"> CAP developed for HIOP and approved. Correspondence received from OEPA (dated 21/08/2014) stating CAP meets the requirements of Condition 4-2 of MS968. First CAP sent submitted with letter dated 11/07/2014, approximately 14 months before first CAR required. CAP (Revision 2) was submitted to EPA on 14/07/2020 - email sighted. The revision of the CAP have been made to reflect current Ministerial Statement conditions and incorporate relevant recommendations from the 2019 Annual Compliance Assessment Report; and in particular, to update the CAPs to include a definition of Potential Non-compliance, to be consistent with the OEPA (2012) Post Assessment Guidelines. Letter received from DWER 30/07/2020 advising that the revised CAPs meet the requirements of Condition 4-1 of the Ministerial Statement – sighted. 	Design	At least six months prior to the first ACAR required by condition 4-6 or prior to the implementation (whichever is sooner) of the proposal and required thereafter	CLD	
968:4.2.(1-6)	Compliance Reporting	The CAP shall indicate the: <ol style="list-style-type: none"> Frequency of compliance reporting Approach and timing of compliance assessments Retention of compliance assessments Method of reporting of potential non-compliances and corrective actions taken Table of contents of compliance assessment reports; and Public availability of ACAR 	The CAP shall indicate the: <ol style="list-style-type: none"> Frequency of compliance reporting Approach and timing of compliance assessments Retention of compliance assessments Method of reporting of potential non-compliances and corrective actions taken Table of contents of compliance assessment reports; and Public availability of ACAR 	CAP req. Content within the HIOP CAP Evidence The latest HIOP CAP (Revision 2 dated 16/06/2020) states: <ul style="list-style-type: none"> Compliance assessment approach and frequency (refer to Section 3 of the CAP). Retention of compliance assessments (refer to Section 5 of the CAP). Method of reporting of potential non-compliances and corrective actions taken (refer to Section 4 and Appendix 2 of the CAP). The CAP includes a general table of contents and table of contents of compliance assessment reports (refer to Appendix 3 of the CAP). Public availability of ACAR (refer to Section 7 of the CAP). 	Design	At least six months prior to the first ACAR required by condition 4-6 or prior to the implementation (whichever is sooner) of the proposal and required thereafter	C	
968:M4-3	Compliance Reporting	The proponent shall assess compliance with conditions in accordance with the CAP required by condition 4-1.	This ACAR shall indicate compliance with CAP conditions	CAP req. Confirm that the ACAR complies with CAP conditions Evidence 2024 ACAR included assessment of compliance (Appendix D: MS968 Statement of Compliance and Audit Table)	Overall	With the first ACAR due 4 September 2015 and annually thereafter	C	
968:M4-4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the compliance assessment plan required by condition 4-1 and shall make those reports available when requested by the CEO.	All completed ACARs stored in KML Document Management System	CAP req. Completed ACARs to be managed through the KML Document Management System for ease of retrieval on request Evidence 2023 ACAR is available within KML's Document Management System and on KML's Intranet - sighted	Overall	Ongoing	C	



AUDIT TABLE

PROPOSAL: Hinge Iron Ore Project (HIOP)
STATEMENT: 968

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS968	Further information
968:M45-5	Compliance Reporting	The proponent shall advise the CEO of any non-compliance within seven days of that non-compliance being known.	Non-compliances reported to OEPA in writing within seven days of the non-compliance being verified by KML	CAP req. <ul style="list-style-type: none"> Letter to OEPA advising of non-compliances Non-compliance reports and correspondence between OEPA and KML on non-compliance 	Overall	Within seven days of the non-compliance being verified by KML	C	
				Evidence <ul style="list-style-type: none"> Review of the Environmental Incident Register found no non-compliance against Statement conditions were reported during the reporting period, and no incidents currently under investigation that may potentially non-compliant against Statement conditions. 				
968:M4-6	Compliance Reporting	The proponent shall submit to the CEO the first ACAR 15 months from the date of issue of this Statement addressing the 12 month period from the date of issue of this Statement and then annually from the date of submission of the first ACAR	Compliance assessments conducted annually	CAP req. <ul style="list-style-type: none"> Correspondence between KML and OEPA demonstrating annual submission of reports and submission of the ACAR 	Overall	With the first ACAR due 4 September 2015 and annually thereafter	C	
				Evidence <ul style="list-style-type: none"> 2023 ACAR submitted to the OEPA on the 31/08/2023. 				
968:M4-6(1)	Compliance Reporting	<i>The ACAR shall</i> be endorsed by the proponent's CEO a person delegated to sign on the CEO's behalf	Compilation of associated ACARs that are endorsed by KML CEO	CAP req. <ul style="list-style-type: none"> Compilation of associated ACAR that are endorsed by KML CEO 	Overall	With the first ACAR due 4 September 2015 and annually thereafter	C	
				Evidence <ul style="list-style-type: none"> 2023 ACAR was endorsed by the delegate of KML's CEO – the endorsed 2023 ACAR sighted. 				
968:M4-6(2)	Compliance Reporting	The ACAR shall include a statement as to whether the proponent has complied with the conditions	ACAR submitted to OEPA	CAP req. <ul style="list-style-type: none"> ACAR submitted to OEPA reports compliance with the Statement conditions 	Overall	With the first ACAR due 4 September 2015 and annually thereafter	C	
				Evidence <ul style="list-style-type: none"> 2023 ACAR for previous reporting period details KMLs adherence to conditions in Section 5 and Appendix D. 				
968:M4-6(3)	Compliance Reporting	<i>The ACAR shall</i> identify all potential non-compliances and describe corrective and preventative actions taken	ACAR submitted to OEPA	CAP req. <ul style="list-style-type: none"> ACAR submitted to OEPA reports non-compliances and corrective and preventative actions. 	Overall	With the first ACAR due 4 September 2015 and annually thereafter	C	
				Evidence <ul style="list-style-type: none"> 2023 ACAR (for MS805, M806 and MS968) submitted for HIOP (for previous reporting period) states KMLs adherence to conditions in Section 5 (being that no non-compliances were recorded during the audit period). 				
968:M4-6(4)	Compliance Reporting	<i>The ACAR shall</i> be made publicly available in accordance with the approved CAP	Make reports publicly available in accordance with PAG4 – Post Assessment Guideline for Making information publicly available (EPA 2012d)	CAP req. <ul style="list-style-type: none"> The ACAR will be made available to stakeholders, including members of the public, upon request and within 7 days of the proponent [KML] receiving the request. 	Overall	Within seven days of KML receiving the request	C	
				Evidence <ul style="list-style-type: none"> 2023 ACAR is available within KML's Document Management System and on KML's website, which is available to public members - sighted. During the reporting period, no requests were made by stakeholders, including members of the public, for a copy of the ACAR. 				
968:M4-6(5)	Compliance Reporting	<i>The ACAR shall</i> indicate any proposed changes to the CAP required by condition 4-1.	Completed ACAR indicating changes to the CAP	CAP req. <ul style="list-style-type: none"> Completed Compliance Assessment Reports indicating changes to the CAP 	Overall	With the first ACAR due 4 September 2015 and annually thereafter	C	
				Evidence <ul style="list-style-type: none"> CAP (Revision 2) was submitted to EPA on 14/07/2020 - email sighted. The revision of the CAP have been made to reflect current Ministerial Statement conditions and incorporate relevant recommendations from the 2019 Annual Compliance Assessment Report; and in particular, to update the CAPs to include a definition of Potential Non-compliance, to be consistent with the OEPA (2012) Post Assessment Guidelines. Letter received from DWER 30/07/2020 advising that the revised CAPs meet the requirements of Condition 4-1 of the Ministerial Statement – sighted. No updates to the current CAP (Revision 2, dated 16/06/2020) was proposed in the 2023 ACAR. 				
968:M5-1	Public Availability of Data	Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this statement and for the remainder of the life of the proposal the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)) relevant to the assessment of this proposal and implementation of this statement	Make validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)) relevant to the assessment of this proposal and implementation of this statement publicly available in accordance with PAG4 – Post Assessment Guideline for Making	CAP req. <ul style="list-style-type: none"> Make validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)) relevant to the assessment of this proposal and implementation of this statement publicly available to stakeholders, including members of the public, upon request and within 7 days of KML receiving the request. Where the information and/or document requested by stakeholders, including members of the public, is subject to an implementation condition that requires the 	Overall	Within seven days of KML receiving the request	C	



AUDIT TABLE

PROPOSAL: Hinge Iron Ore Project (HIOP)
STATEMENT: 968

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS968	Further information
		assessment of this proposal and implementation of this Statement.	information publicly available (OEPA, 2012c)	<p>information and/or document to be prepared to another party's (that is, not KML) satisfaction, requirements or approval and KML has not yet received written notice that the information and/or documentation is satisfactory to, to the requirements of or approved by the other party, KML shall provide the information and/or documentation to the stakeholder within 7 days of KML receiving written notice from the other party that the information and/or document is to the satisfaction of, requirements of or approved by the other party.</p>				
				<p>Evidence</p> <ul style="list-style-type: none"> Data relating to environmental monitoring and management of dust, fauna, flora and land rehabilitation is presented in ACARs. Data sighted as part of this audit was readily available. No requests for provision of data was received during the audit period. 				
968:M5-2(1 and 2)	Public Availability of Data	If any data referred to in condition 5-1 contains particulars of a secret formula or process the proponent may submit a request for approval from the CEO to not make this data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.	Letter to OEPA which requests approval from the CEO to not make data that contains particulars of a secret formula or process publically available	<p>CAP req.</p> <p>Letter to OEPA which request for approval from the CEO to not make data that contains particulars of a secret formula or process publically available.</p>	Overall	Within 7 days of the proponent receiving the request	C	
				<p>Evidence</p> <ul style="list-style-type: none"> Data sighted as part of this audit was readily available. No requests for provision of data was received during the audit period. No secret formula or process, or confidential commercially sensitive information required not to be made publicly available. 				



AUDIT TABLE

PROPOSAL: Hinge Iron Ore Project (HIOP)
STATEMENT: 968

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS968	Further information
968:M6-1	Subterranean fauna	Prior to the commencement of ground disturbing activities, the proponent shall implement the Gindalbie Metals Limited Subterranean Fauna Sampling Proposal for the Hinge Deposit provided to the Office of the EPA (19 February 2014) and report its findings to the CEO.	Implement the sampling proposal as detailed in the document "Gindalbie Metals Limited Subterranean Fauna Sampling Proposal for the Hinge Deposit" as provided to the EPA. Report the findings of the sampling proposal to the CEO.	CAP req.	Evidence of submission of sampling report (detailing findings) to the CEO.	Overall	Prior to commencement of ground disturbing activities, Upon completion of sampling program	CLD
				Evidence	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968.			
968:M6-2	Subterranean fauna	If the CEO determines that the sampling required under condition 6-1 has identified fauna that is regionally significant within the proposal envelope as defined in Schedule 1 of this Statement, the proponent is to prepare a Subterranean Fauna Management Plan, prior to ground disturbing activities, to the requirements of the CEO. If the CEO determines that sampling undertaken in accordance with condition 6-1 does not identify subterranean fauna that is regionally significant within the proposal envelope as defined in Schedule 1 of this statement, then conditions 6-2 to 6-9 and 7 are not required to be implemented.	Report the findings of the sampling proposal to the CEO.	CAP req.	Evidence of submission of sampling report (detailing findings) to the CEO.	Overall	Prior to commencement of ground disturbing activities, Upon completion of sampling program	CLD
				Evidence	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968.			
968:M6-3	Subterranean fauna	The objective of the Subterranean Fauna Management Plan is to ensure that mine construction and operational activities are carried out in a manner that minimises the impacts to the subterranean fauna.	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and that Conditions 6-3 to 7-5 of MS968 to not apply to HIOP.	CAP req.	(No requirement given)	Requirement removed	CLD	NA
				Evidence	N/A			
968:M6-4	Subterranean fauna	The Subterranean Fauna Management Plan required by condition 6-2 shall set out procedures and measures to: <ol style="list-style-type: none"> when implemented, substantiate whether condition 6-3 is being met. include a description of procedures for recording the distribution of species of subterranean fauna and relevant aspects of subterranean fauna habitat to ensure that the long-term viability of subterranean fauna species is not at risk as a result of implementation of the proposal; and identify management and/or contingency measures to be implemented in the event that the impacts to the long-term viability of subterranean fauna species and their habitats may be unknown or at risk as a result of implementing the proposal. 	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and the Conditions 6-3 to 7-5 of MS968 to not apply to HIOP.	CAP req.	(No requirement given)	Requirement removed	CLD	NA
				Evidence	N/A			
968:M6-5	Subterranean fauna	The proponent shall implement the approved Subterranean fauna management plan required by condition 6-2 until the CEO advises implementation may cease.	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and the Conditions 6-3 to 7-5 of MS968 to not apply to HIOP	CAP req.	(No requirement given)	Requirement removed	CLD	NA
				Evidence	N/A			
968:M6.6	Subterranean fauna	In the event that monitoring required by condition 6-4(2) indicates that implementation of the proposal may pose a risk to the long-term viability of subterranean fauna species the proponent shall <ol style="list-style-type: none"> provide a report to the CEO within twenty-eight (28) days of identification that implementation of the proposal may pose a risk to the long-term viability of subterranean species, proposing measures to avoid, mitigate or offset these risks. 	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and that Conditions 6-3 to 7-5 of MS968 do not apply to HIOP	CAP req.	(No requirement given)	Requirement removed	CLD	NA
				Evidence	N/A			
968:M6.7	Subterranean fauna	The proponent may review and revise the Subterranean Fauna Management Plan to the requirements of the CEO.	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and that Conditions 6-3 to 7-5 of MS968 do not apply to HIOP	CAP req.	(No requirement given)	Requirement removed	CLD	NA
				Evidence	N/A			



AUDIT TABLE

PROPOSAL: Hinge Iron Ore Project (HIOP)
STATEMENT: 968

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS968	Further information
968:M6.8	Subterranean fauna	The proponent shall review and revise the Subterranean Fauna Management Plan as and when directed by the CEO.	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and that Conditions 6-3 to 7-5 of MS968 do not apply to HIOP.	CAP req. (No requirement given)	Requirement removed	CLD	NA	
				Evidence N/A				
968:M6.9	Subterranean fauna	The proponent shall implement the approved revisions of the Subterranean Fauna Management Plan required by conditions 6-7 and 6-8.	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and that Conditions 6-3 to 7-5 of MS968 do not apply to HIOP	CAP req. (No requirement given)	Requirement removed	CLD	NA	
				Evidence N/A				
968:M7.1	Offsets	If pursuant to condition 6-6(1), the CEO determines that risks to the long-term viability of subterranean fauna species may be offset, the proponent shall prepare a Subterranean Fauna Research Project and submit it to the CEO for approval.	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and that Conditions 6-3 to 7-5 of MS968 do not apply to HIOP	Condition deemed 'not applicable' as per findings of 968:M6.1 and 968:M6.2	Requirement removed	CLD	NA	
968:M7.2(1)	Offsets	The Subterranean Fauna Research Project pursuant to condition 7-1 shall detail the funding arrangement that has been agreed to by the CEO.	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and that Conditions 6-3 to 7-5 of MS968 do not apply to HIOP	Condition deemed 'not applicable' as per findings of 968:M6.1 and 968:M6.2	Requirement removed	CLD	NA	
968:M7.2(2)	Offsets	The Subterranean Fauna Research Project pursuant to condition 7-1 shall when implemented, meet the objective of increasing knowledge and understanding of subterranean fauna in the Midwest region.	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and that Conditions 6-3 to 7-5 of MS968 do not apply to HIOP	Condition deemed 'not applicable' as per findings of 968:M6.1 and 968:M6.2	Requirement removed	CLD	NA	
968:M7.2.(3)	Offsets	The Subterranean Fauna Research Project pursuant to condition 7-1 shall be prepared in consultation with the Department of Parks and Wildlife and the Western Australian Museum.	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and that Conditions 6-3 to 7-5 of MS968 do not apply to HIOP	Condition deemed 'not applicable' as per findings of 968:M6.1 and 968:M6.2	Requirement removed	CLD	NA	
968:M7.3	Offsets	The proponent shall implement the approved Subterranean Fauna Research Project within twelve (12) months of results from surveys pursuant to condition 6-2.	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and that Conditions 6-3 to 7-5 of MS968 do not apply to HIOP	Condition deemed 'not applicable' as per findings of 968:M6.1 and 968:M6.2	Requirement removed	CLD	NA	
968:M7.4	Offsets	The proponent shall implement the approved Subterranean Fauna Research Project until the CEO advises implementation may cease.	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and that Conditions 6-3 to 7-5 of MS968 do not apply to HIOP	Condition deemed 'not applicable' as per findings of 968:M6.1 and 968:M6.2	Requirement removed	CLD	NA	
968:M7.5	Offsets	A report shall be submitted to the CEO documenting the results of the Subterranean Fauna Research Project, identifying the findings of the research required by condition 7-2.	Letter received from the OEPA on the 24 June 2014 that the survey was conducted in line with Condition 6-1 of MS968 and that Conditions 6-3 to 7-5 of MS968 do not apply to HIOP	Condition deemed 'not applicable' as per findings of 968:M6.1 and 968:M6.2	Requirement removed	CLD	NA	