

# Karara Mining Limited

Department of Water and Environmental Regulation




Ministerial Statements 805, 806 & 968

Annual Compliance Assessment Report 2025

CORP-EN-REP-1148

22 August 2025

CORP-EN-REP-1148 MS 805 806 968 ANNUAL COMPLIANCE REPORT 2025

REV	DESCRIPTION	ORIG	REVIEW	APPROVED	DATE
0	Issued for use	 V Scott	 M Chen	 G Trench	22-Aug-25

## TABLE OF CONTENTS

ABBREVIATIONS .....	vii
1 INTRODUCTION .....	1
2 PROJECT SUMMARY AND STATUS .....	2
2.1 Karara Iron Ore Project (KIOP) .....	2
2.2 Mungada Iron Ore Project (MIOP) .....	2
2.3 Hinge Iron Ore Project (HIOP) .....	3
3 KEY ENVIRONMENTAL IMPROVEMENTS .....	8
3.1 Remote Sensing - 2024 Aerial Survey .....	8
3.2 KML - ARC Centre for Mine Site Restoration Research Program .....	8
3.3 EPBC Listed Fauna Stress Monitoring .....	9
3.4 <i>Acacia woodmaniorum</i> Translocation Plan .....	9
4 PROJECT APPROVALS .....	11
5 COMPLIANCE WITH CONDITIONS .....	12
5.1 Non-Compliance .....	13
6 ENVIRONMENTAL MONITORING AND MANAGEMENT .....	21
6.1 Dust Management .....	21
6.1.1 HIOP and MIOP Dust Results .....	21
6.1.2 KIOP Dust Results .....	23
6.2 Fauna Management .....	25
6.2.1 Western Spiny-tailed Skink Management and Monitoring .....	25
6.2.2 Malleefowl Management and Monitoring .....	29
6.2.3 Shield-Backed Trapdoor Spider Monitoring .....	32
6.2.4 Feral Animal Monitoring .....	32
6.3 Fauna Mortalities .....	33
6.4 Flora Management .....	36

6.4.1	Vegetation Health.....	36
6.5	Rehabilitation.....	55
6.5.1	Rehabilitation Performance Monitoring.....	55
6.5.2	Analogue Sites .....	62
6.5.3	Blue Hills North Waste Rock Dump Rehabilitation .....	63
6.5.4	Terapod Waste Rock Dump Rehabilitation .....	65
6.5.5	Hinge Waste Rock Dump Rehabilitation .....	68
6.5.6	Karara Waste Rock Dump Rehabilitation .....	69
6.5.7	Linear Infrastructure Rehabilitation .....	71
6.5.8	Seed Collection .....	74
7	CONCLUSION .....	76
8	REFERENCES .....	78

## LIST OF APPENDICES

APPENDIX A: KML ENVIRONMENT POLICY .....	79
APPENDIX B: MS805 STATEMENTS OF COMPLIANCE AND AUDIT TABLE.....	80
APPENDIX C: MS806 STATEMENTS OF COMPLIANCE AND AUDIT TABLE.....	81
APPENDIX D: MS968 STATEMENTS OF COMPLIANCE AND AUDIT TABLE.....	82

## LIST OF FIGURES

Figure 1: Project Location .....	4
Figure 2: KIOP Site Features .....	5
Figure 3: MIOP Site Features .....	6
Figure 4: HIOP Site Features.....	7
Figure 5: HIOP Monthly Dust Deposition Levels.....	22

Figure 6: MIOP Monthly Dust Deposition Levels .....	22
Figure 7: KIOP Monthly Dust Deposition Levels .....	24
Figure 8: Karara Homestead Monthly Dust Deposition Levels .....	24
Figure 9: WStS Monitoring Locations .....	27
Figure 10: WStS Evidence Recorded at Control and Impact Sites Across All KML Tenements .....	28
Figure 11: WStS Scat Evidence Recorded (%) at Control and Impact Sites Across All KML Tenements .....	28
Figure 12: Malleefowl Mound Monitoring .....	31
Figure 13: Vegetation Health Monitoring Quadrats at KIOP1 .....	39
Figure 14: Vegetation Health Monitoring Quadrats at KIOP2 .....	40
Figure 15: Vegetation Health Monitoring Quadrats at MIOP .....	41
Figure 16: Vegetation Health Monitoring Quadrats at HIOP .....	42
Figure 17: Monthly Rainfall for the Karara Mine Site (2018 – 2024) .....	52
Figure 18: Annual Rainfall for the Karara Mine Site (2012 – 2024) .....	52
Figure 19: Rehabilitation Monitoring Quadrats at Blue Hills North Waste Rock Dump .....	57
Figure 20: Rehabilitation Monitoring Quadrats at the Terapod Waste Rock Dump .....	58
Figure 21: Rehabilitation Monitoring Quadrats at the Hinge Waste Rock Dump .....	59
Figure 22: Rehabilitation Monitoring Quadrats at the Karara Waste Rock Dump .....	60
Figure 23: Rehabilitation Monitoring Quadrats at the Pipeline .....	61
Figure 24: Species Diversity (Shannon index) Recorded at the Analogue Quadrats Surrounding the Waste Rock Dumps .....	62
Figure 25: Species Diversity (Shannon index) Recorded at the Analogue Quadrats Surrounding the Linear Infrastructure Corridor .....	63
Figure 26: Species Diversity Recorded at the Blue Hills North WRD Rehabilitation Monitoring Quadrats (BHNWD01, 3-5), Relative to the Analogue Quadrat (BHNWD01C) .....	65
Figure 27: Species Diversity Recorded at the Terapod WRD Rehabilitation Monitoring Quadrats (TPD01-09), Relative to the Analogue Quadrat (Spyder West) .....	67



Figure 28: Species Diversity Recorded at the Hinge WRD Rehabilitation Monitoring Quadrats (HIN01-06), Relative to the Analogue (HIN04) .....	69
Figure 29: Species Diversity Recorded at the Karara WRD Rehabilitation Monitoring Quadrats (KARWD01-02), Relative to the Analogue (Karara North).....	71
Figure 30: Species Diversity Recorded at the Pipeline Rehabilitation Quadrats (Pipeline 01-05), Relative to the Associated Analogues (Pipeline01C-05C).....	73
Figure 31: Seed Collection Areas Within the Project .....	75

## LIST OF TABLES

Table 1: Non-Compliance Summary .....	14
Table 2: Malleefowl Monitoring Results 2018-2025 .....	30
Table 3: Feral Animals Sighted Between 2018-2025 .....	32
Table 4: Feral Animals Trapped Between 2017-2025 .....	33
Table 5: Fauna Mortalities.....	34
Table 6: Weed Cover Impact Ratings at Monitoring and Analogue (CQ1-5 & HIN04) Sites .....	43
Table 7: Percentage Dust Cover Impact Ratings Recorded at the Vegetation Health Monitoring and Control (CQ1-5 & HIN04) Sites .....	45
Table 8: Salinity Ratings Recorded at the Vegetation Health Monitoring and Control (CQ1-5 & HIN04) Sites .....	47
Table 9: Vegetation Grazing Impact Ratings Recorded at the Vegetation Health Monitoring and Control (CQ1-5 & HINO4) Sites .....	48
Table 10: Erosion Impacts Recorded at the KIOP Vegetation Health Monitoring and Control Sites ...	50
Table 11: Vegetation Conditions Ratings Recorded at the Vegetation Health Monitoring and Control Sites .....	53
Table 12: Weed Species Recorded During the September 2024 Survey at Blue Hills North WRD .....	64
Table 13: Weed Species Recorded During the September 2024 Survey at Terapod WRD .....	66
Table 14: Weed Species Recorded During the September 2024 Survey at the Hinge WRD .....	69
Table 15: Weed Species Recorded During the September 2024 Survey at the Karara WRD .....	70

Table 16: Weed Species Recorded During the September 2024 Survey at the Linear Infrastructure Corridor .....	72
Table 17: Native Flora Seeds Collected .....	74

## 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)
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
KML	Karara Mining Limited

MINISTERIAL STATEMENTS 805, 806 & 968  
ANNUAL COMPLIANCE ASSESSMENT REPORT 2025

Abbreviation	Definition
LIC	Linear Infrastructure Corridor
MCP	Mine Closure Plan
MLE	Mine Life Extension
MIOP	Mungada Iron Ore Project
MS 805	Ministerial Statement 805
MS 806	Ministerial Statement 806
MS 968	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
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 the Ministerial Statements No. 805 (MS 805) – Karara Iron Ore Project (KIOP), No. 806 (MS 806) – Mungada Iron Ore Project (MIOP) and No. 968 (MS 968) – Hinge Iron Ore Project (HIOP). Collectively KIOP, MIOP, and HIOP form the Greater Karara Iron Ore Project (the Project).

This is the sixteenth 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). CAPs govern the compliance of the Ministerial Statements and are used as the template for this report. 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 MS 805, MS 806 and MS 968 and has been prepared in accordance with the approved CAPs. ACAR addresses compliance with the Ministerial Conditions for the reporting period (1 July 2024 – 30 June 2025 for MS 805 and MS 806 and 4 June 2024 – 3 June 2025 for MS 968).

## **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 215 km 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 25<sup>th</sup> 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 25<sup>th</sup> 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 25<sup>th</sup> March 2019.

Monitoring results are further discussed in section 6 of this report. [00]

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 are used as a mine's emergency response training area and core shed;
- 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.

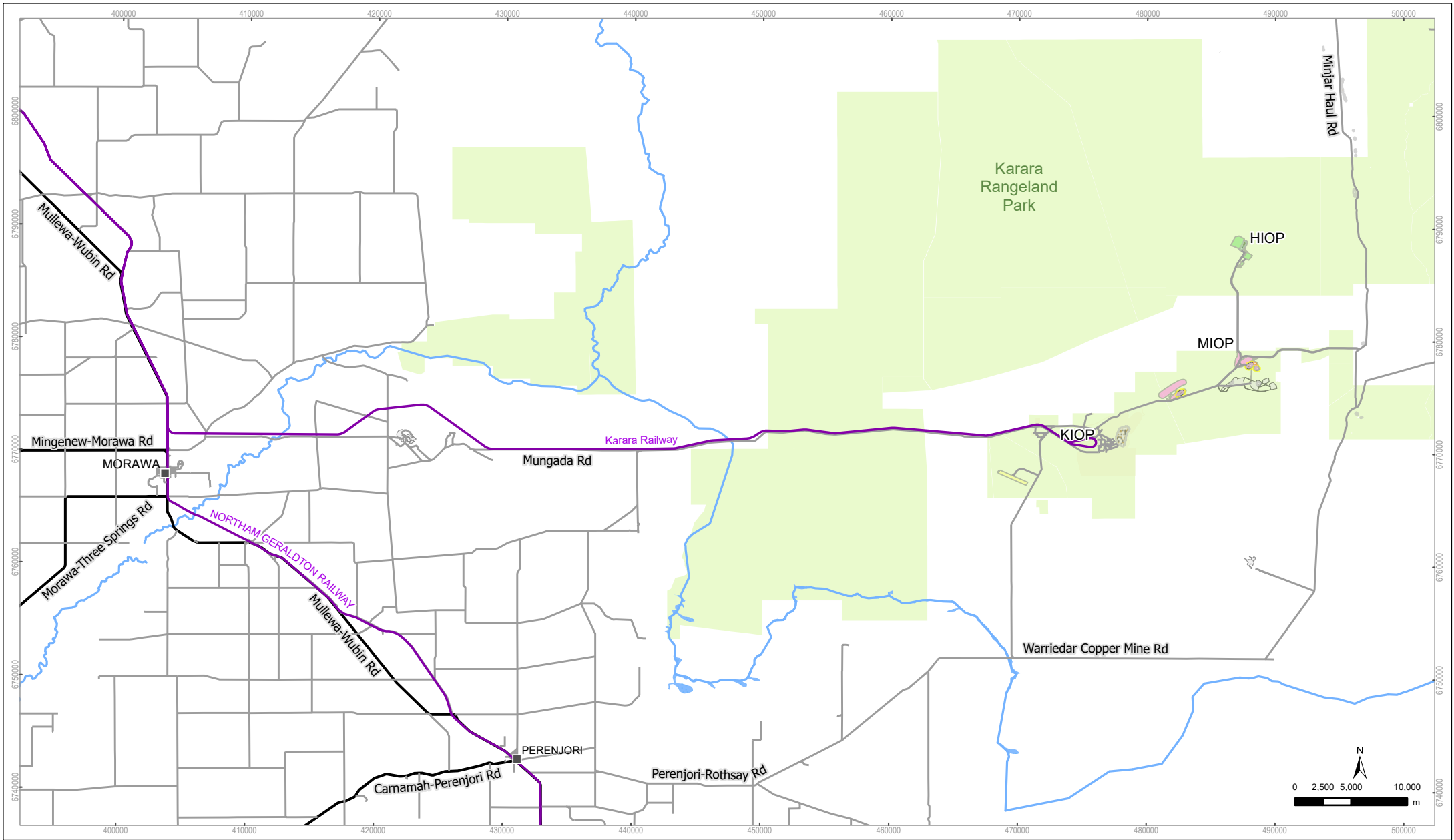
These areas are not scheduled to be rehabilitated until the closure of KIOP, or when they are no longer needed to support mining operations at Karara.

## 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. A brief mining of the remaining hematite ore from the Hinge Pit occurred during the reporting period.

***Figure 1: Project Location***





MS Annual Compliance Report  
(2025)

Project Regional Location



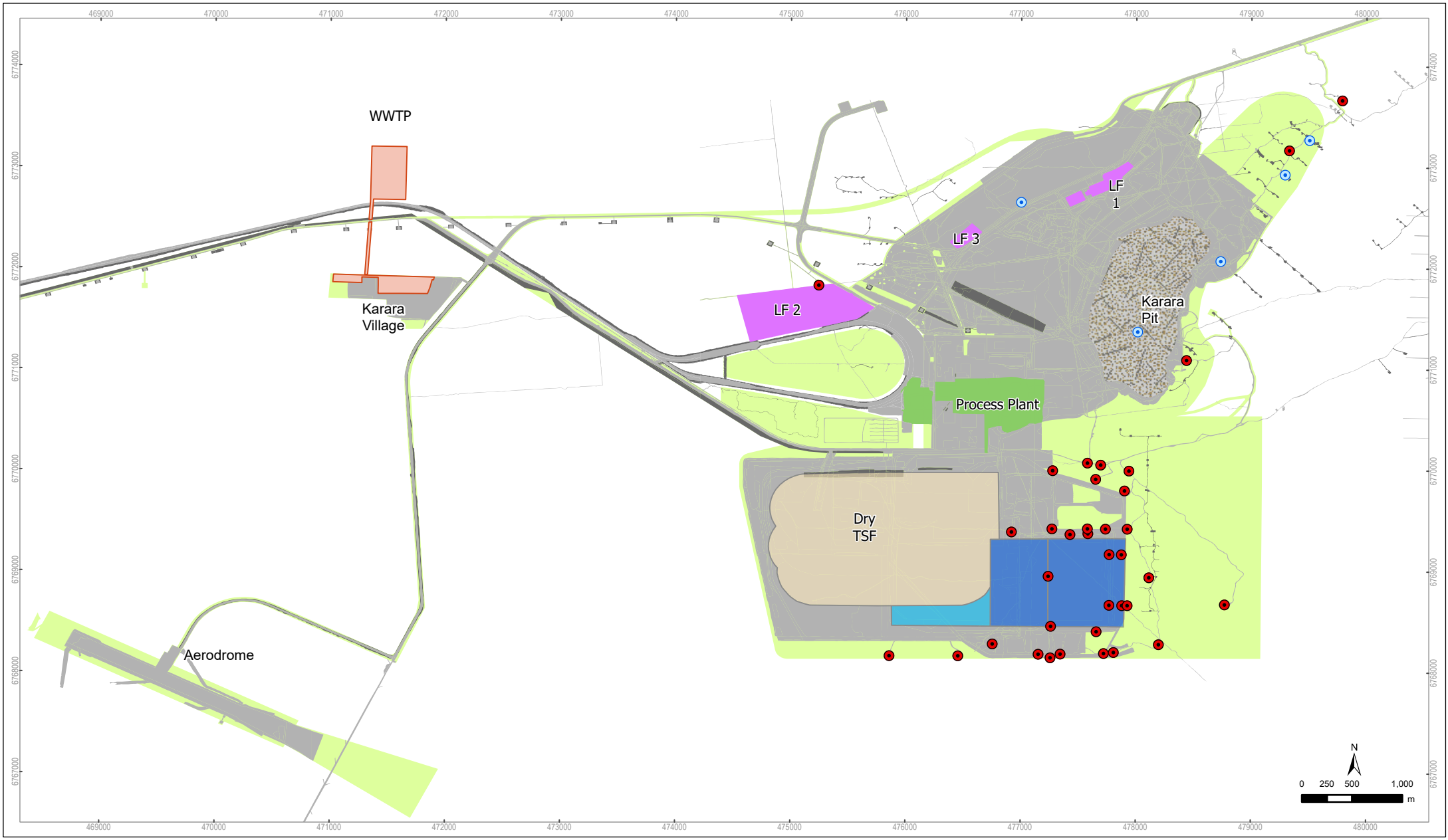
- Railway (Freight)
- Roads Regional
  - Main
  - Minor



Ref: K0193 F1  
Version: A  
25 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:450,000  
Size: A4

***Figure 2: KIOP Site Features***



MS Annual Compliance Report (2025)

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: K0193 F2  
Version: A  
25 July 2025

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

***Figure 3: MIOP Site Features***

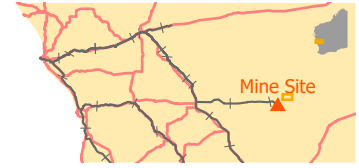


MS Annual Compliance Report  
(2025)

MIOP Site Features

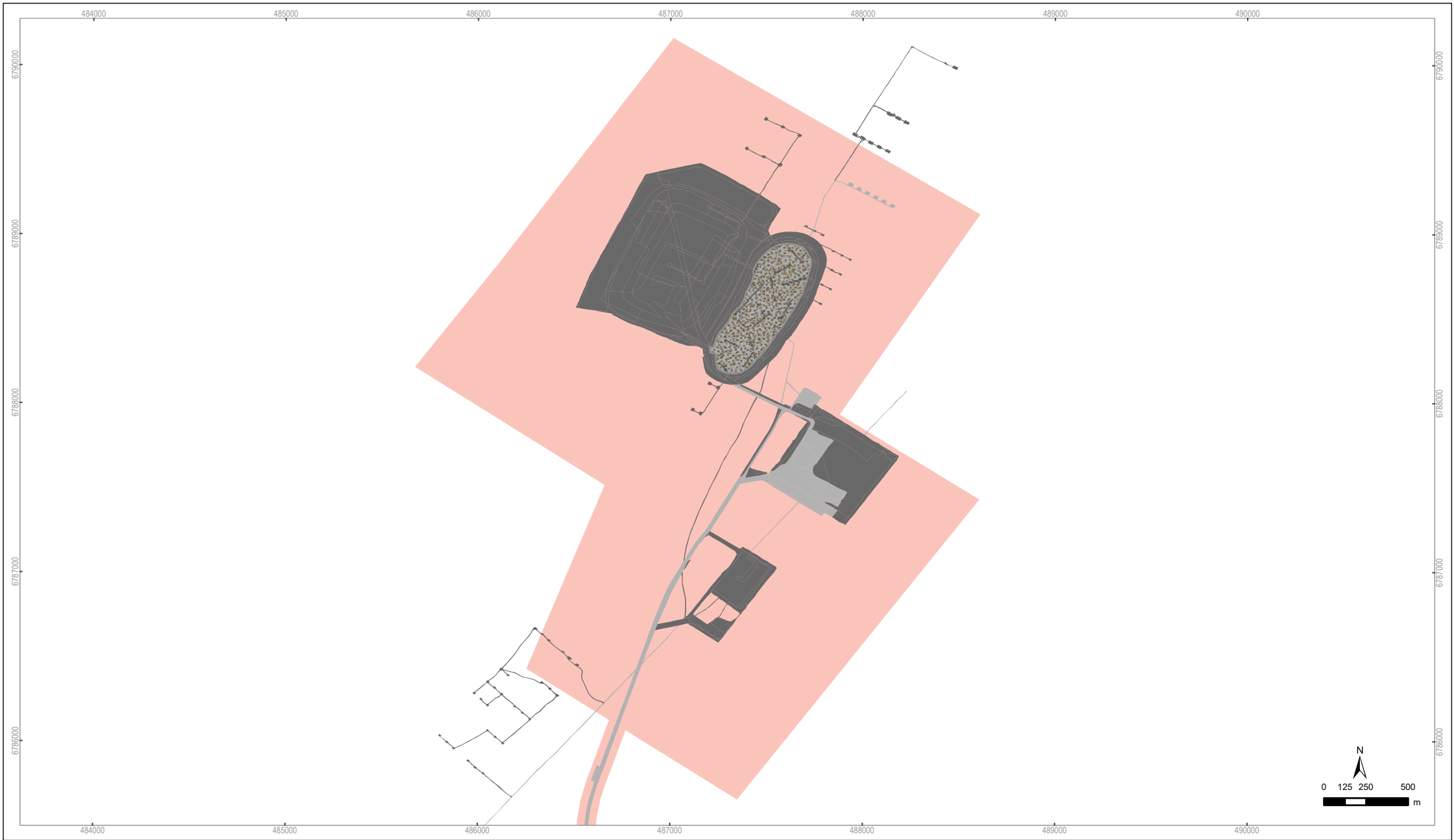


- |                                  |                |
|----------------------------------|----------------|
| Abandonment Bund                 | Rehabilitation |
| Backfilled Pit                   | KIOP MS 805    |
| Open Pit                         | HIOP MS 968    |
| Ground Disturbance ALL by Status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



Ref: K0193 F3	Proj: GDA94 MGAZ50
Version: A	Scale: 1:35,000
25 July 2025	Size: A4

***Figure 4: HIOP Site Features***

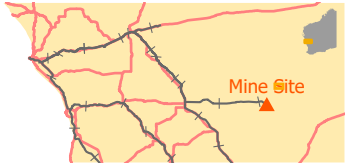


MS Annual Compliance Report  
(2025)

HIOP Site Features

**KARARA**  
MINING LTD

- |                                  |                |
|----------------------------------|----------------|
| Mine Voids                       | Rehabilitation |
| Open Pit                         | HIOP MS 968    |
| Ground Disturbance ALL by Status |                |
| Open Ground Disturbance          |                |



Ref: K0193 F4	Proj: GDA94 MGAZ50
Version: A	Scale: 1:30,000
25 July 2025	Size: A4

### **3 KEY ENVIRONMENTAL IMPROVEMENTS**

KML's Environment Policy requires KML to apply, maintain and continually improve an effective environmental management system to ensure compliance with obligations and enhance environmental performance. The current Environment Policy (revised in January 2025) 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 - 2024 Aerial Survey**

An annual aerial survey (fixed wing aircraft) of the site was conducted in July 2024 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, monitoring results for *A. woodmaniorum* at Sites A and C indicated stable health conditions, with new growth observed and a slight decrease in average height, particularly in plants derived from cuttings. The benchmark measure of interim success for the translocation of cuttings and salvaged plants 2-10 years from planting 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 83% for the salvaged plants. At site C, the survival rate has declined to 55% for the cuttings, and 61% for the salvaged plants. Under the terms of the proposal, both sites still considered as successful.

The productive potential of the translocated plants remains evident. At site C, 14% of salvaged plants were recorded producing seeds and 10% salvaged plants and no cuttings were observed producing flowers. At site A, 75% of plants were recorded producing flowers; however, none of the plants produced seed during the reporting period. For the total plants at both sites, 16% had neither flower nor 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 2025, 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 continued to be assessed as a 'Controlled Action' by the Department of Climate Change, Energy, Environment and Water (DCCEEW) under the accredited assessment approach agreed with the Environmental Protection Authority (EPA). A range of environmental studies and impact assessments including detailed and targeted flora, vegetation and fauna surveys and a Greenhouse Gases Management Plan for the Proposal have been undertaken during the reporting period in line with the EPA's s40(2)(a) notice for the additional information requirements for the assessment for the Proposal and DCCEEW's additional information requirements for assessment of Proposal under the EPBC Act. KML held a few meetings with the EPA and DCCEEW to further clarify the additional information requirements, options to accelerate the assessment process and the proposed offset strategy for the Proposal during the reporting period. Most of the environmental studies and assessments for the Proposal have been completed during the reporting period. The Environmental Review Document for the Proposal is currently being finalised and aimed to be submitted to the EPA in September 2025.

## 5 COMPLIANCE WITH CONDITIONS

KML conducted an audit in August 2025 to satisfy Condition 4-3 of MS 805, MS 806 and MS 968. The audit was conducted in accordance with the CAPs prepared under MS 805, MS 806, and MS 968 respectively and evaluated compliance with all conditions for the period 1 July 2024 to 30 June 2025 (MS 805 and MS 806) and 4 June 2024 to 3 June 2025 (MS 968).

The DWER-approved audit table for MS 805 (Appendix B) comprise 54 audit elements. Of these:

- 38 elements were found to be compliant;
- 5 elements were found to be completed;
- 5 elements were found to be not required at this stage;
- 6 elements were assessed as being minor non-compliance (all related to shield-backed trapdoor spider monitoring); and
- Nil elements were assessed as being a major non-compliance, or potentially non-compliant or in process.

The DWER-approved audit table for MS 806 (Appendix C) comprise 56 audit elements. Of these:

- 31 elements were found to be compliant;
- 17 elements were found to be completed;
- 5 elements were found to be not audited at this stage;
- 2 elements were assessed as being minor non-compliant;
- 1 element was assessed as being not required at this stage; and
- Nil elements were assessed as being a major non-compliance, or potentially non-compliant or in process.

The DWER-approved audit table for MS 968 (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; and
- Nil elements were assessed as being potentially non-compliant or in process.

The findings of the audit are summarised below. The statements of compliance for MS 805, MS 806 for the period 1 July 2024 to 30 June 2025 and MS 968 for the period of 4 June 2024 to 3 June 2025 are detailed in Appendix B, Appendix C and Appendix D respectively.

## **5.1 Non-Compliance**

Six minor non-compliances associated with the non-compliance reporting (MS805:4.5) and Shield-backed Trapdoor Spider monitoring (MS805:9.1, 9.2, 9.3, 9.4 and 9.5) continued to be recorded in this annual audit for MS 805. Two minor non-compliances with respect to the non-compliance reporting (MS 806:4.5) and rehabilitation of the MIOP area within five years following cessation of productive mining (MS 806:11.1.1a) also continued to be recorded in this annual audit for MS 806. 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>	Minor	<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</p>	<p>KML will continue liaison with DWER-EPAS for the progression on s46 inquiry to remove Condition 9 of spider monitoring during the assessment of the Proposal.</p> <p>It is understood that a new Ministerial Statement for the Proposal will replace the MS805 when the Proposal is approved and this ongoing minor non-compliance would be resolved</p>

MINISTERIAL STATEMENTS 805, 806 & 968  
ANNUAL COMPLIANCE ASSESSMENT REPORT 2025

Condition	Level of Non-compliance	Description of Non-compliance	Corrective Action
		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><b>Spider Monitoring</b></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>	Minor	<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</p>	<p>KML will continue liaison with DWER-EPAS for the progression on s46 inquiry to remove Condition 9 of spider monitoring during the assessment of the Proposal.</p> <p>It is understood that a new Ministerial Statement for the Proposal will replace the MS805 when the Proposal is approved and this ongoing minor non-compliance would be resolved.</p>

MINISTERIAL STATEMENTS 805, 806 & 968  
ANNUAL COMPLIANCE ASSESSMENT REPORT 2025

Condition	Level of Non-compliance	Description of Non-compliance	Corrective Action
<p>number and size of area(s) inhabited by spiders.</p> <p>number, size and distribution of burrows in occupied areas</p> <p>number of burrows occupied by spiders</p> <p>MS805:9.4</p> <p>The proponent shall submit the results of the monitoring program required by Condition 9.1 to the CEO annually, as required.</p> <p>MS805:9.5</p> <p>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.</p> <p>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</p> <p>The proponent shall advise the CEO of any non-compliance as soon as practicable.</p>	Minor	<p>One minor non-compliance associated with not meeting the 70% species composition target for MIOP (monitoring quadrat BHNWD04 due to abundance of one species) within five years of following the cessation of productive mining (Condition</p>	<p>It is expected the ongoing non-compliance with MS 806 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</p>



MINISTERIAL STATEMENTS 805, 806 & 968  
ANNUAL COMPLIANCE ASSESSMENT REPORT 2025

Condition	Level of Non-compliance	Description of Non-compliance	Corrective Action
		11.1.1a) was identified during the 2025 compliance audit. Although 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 BHNWD04 not meeting the 70% species composition target for MIOP.	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 this ongoing non-compliance when the Proposal is approved.
<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>	Minor	<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 BHNWD04 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>

MINISTERIAL STATEMENTS 805, 806 & 968  
ANNUAL COMPLIANCE ASSESSMENT REPORT 2025

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

Conditions 9.2 (1), 9.3 (1-3), 9.4 and 9.5 of MS 805 mandate the monitoring and reporting of the Shield-backed Trapdoor Spider (*Idiosoma nigrum*) population in the Blue Hills area to ensure that the Project does not impact its persistence. However, a taxonomic review by the Western Australian Museum determined that the species associated with the Project is not the endangered *I. nigrum*, but the more common *Idiosoma clypeatum* ('MYG018', P3).

In July 2018, KML submitted a request to the DWER to amend MS 805 by removing Condition 9 (spider monitoring). On 13 February 2019, the DWER-EPAS responded via form under s.46 of the EP Act, stating that the Minister requested the EPA to assess the removal of Condition 9 and consider the inclusion of offsets as conditions. KML subsequently provided additional offsets related information on 18 May 2022, as requested by the DWER-EPAS, to support the EPA's inquiry into amending the implementation conditions of KIOP MS 805 under s.46 (1) of the EP Act.

The proposed removal of Condition 9 (and its associated sub-conditions 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 s.38 of the EP Act on 21 February 2022. A revised referral application was later submitted under s.38C of the EP Act on 30 September 2022.

On 21 June 2023, the 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 s.38G (1) of the EP Act. Earlier, on 13 June 2023, the DWER-EPAS advised that the EPA's inquiry into the removal of Condition 9 under s.46 of the EP Act was mostly on hold. It is anticipated that the inquiry will be considered alongside the Proposal's assessment under Part IV of the EP Act and determination of conditions in the new Ministerial Statement. No further updates on this matter were received during the reporting period while the Proposal remained under assessment by the DWER-EPAS.

The most recent monitoring of the Shield-backed Trapdoor Spider occurred in 2019, with no monitoring conducted in 2020, 2021, 2022, 2023 and 2024. Spider monitoring has been discontinued following the reclassification of the species. During a meeting in September 2021, the DWER advised that KML could discontinue spider monitoring, as KML was deemed to have fulfilled the intentions of MS 805 Conditions 9.2 (1-2), 9.3 (1-3), 9.4, and 9.5 associated with spider monitoring.

KML will continue engaging with the DWER-EPAS regarding the progression on the s.46 inquiry to remove Condition 9 (spider monitoring) as part of the ongoing assessment of the Proposal.

## **Rehabilitation at MIOP**

Condition 11-1 (1) (a) of MS 806 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, core shed and an emergency response training area. Those areas are expected to be required until the completion of mining at KIOP in 2053.

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 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 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 MS 806 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 DWER-EPAS for the 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 MS 805, MS 806 and MS 968.

### **6.1 Dust Management**

In accordance with Condition 6.5 of MS 805 and MS 806, the KML's Dust Management Plan (CORP-EN-PLN-1010) and the Environmental Procedure – Dust Monitoring (CORP-EN-PRO-1005), KML monitors the impact of mining activities on ambient air quality and the potential effects of dust on vegetation health.

The following internal KML dust deposition trigger limits are outlined in the KML Environmental Procedure – Dust Monitoring:

- Trigger limit of 8 g/m<sup>2</sup>/month around operational mining areas; and
- Threshold limit of 10 g/m<sup>2</sup>/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 areas 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. During the reporting period, monthly dust deposition levels ranged between 0.2 to 2.2 g/m<sup>2</sup>/month (12-month average of 1.2 g/m<sup>2</sup>/month) at HIOP (Figure 5). At MIOP (Figure 6), monthly dust deposition levels ranged from 1.4 to 2.9 g/m<sup>2</sup>/month (12-month average of 2 g/m<sup>2</sup>/month).

No exceedances were recorded at HIOP and MIOP during the reporting period.

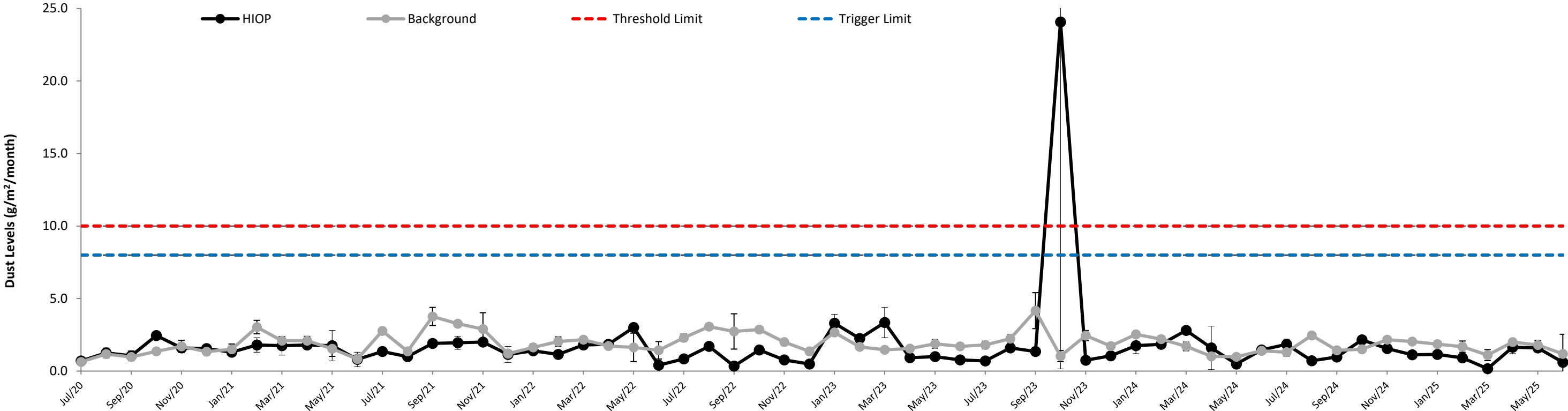


Figure 5: HIOP Monthly Dust Deposition Levels

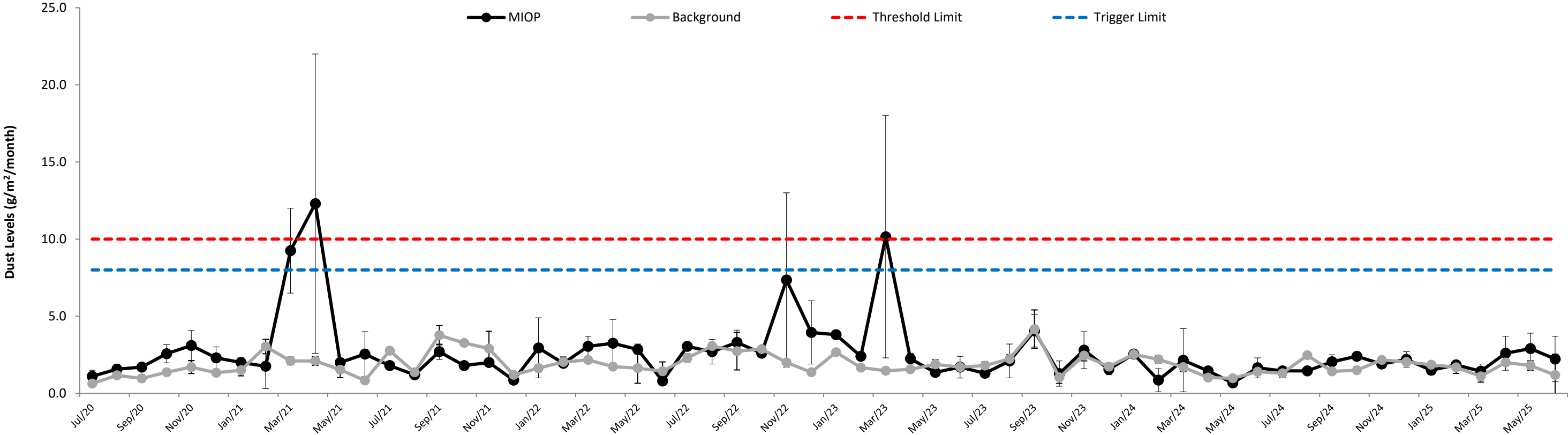


Figure 6: MIOP Monthly Dust Deposition Levels

## 6.1.2 KIOP Dust Results

During the reporting period, monthly dust deposition levels of the cumulative dust gauges at KIOP ranged from 1.7 to 2.9 g/m<sup>2</sup>/month (12-month average of 2.21 g/m<sup>2</sup>/month), whilst average background levels ranged from 1.1 to 2.5 g/m<sup>2</sup>/month (12-month average of 1.71 g/m<sup>2</sup>/month) (Figure 7).

During the reporting period, monthly dust deposition levels at the nearest sensitive receptor (Karara Homestead, approximately 7km south of KIOP) ranged from 0.05 to 1.5 g/m<sup>2</sup>/month, with a 12-month average of 1 g/m<sup>2</sup>/month (Figure 8), which shows a decrease from 1.28 g/m<sup>2</sup>/month recorded in the last reporting period.

During the reporting period, there were no exceedances of the trigger limit (8 g/m<sup>2</sup>/month) or the threshold limit (10 g/m<sup>2</sup>/month). These monitoring results indicate that KML's dust management measures were effective in controlling dust emissions to the surrounding environment throughout the reporting period.

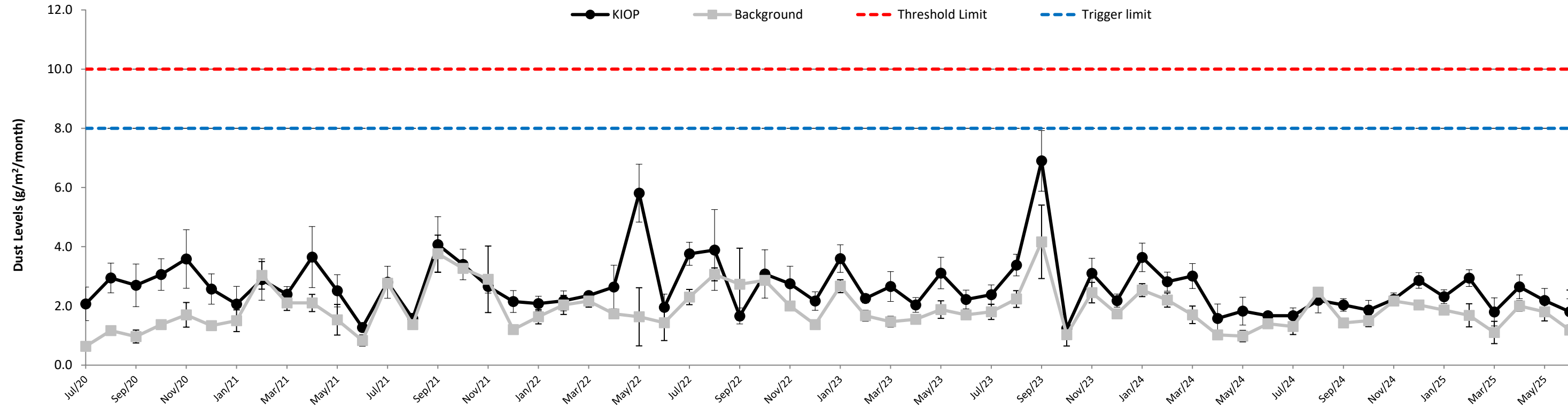


Figure 7: KIOP Monthly Dust Deposition Levels

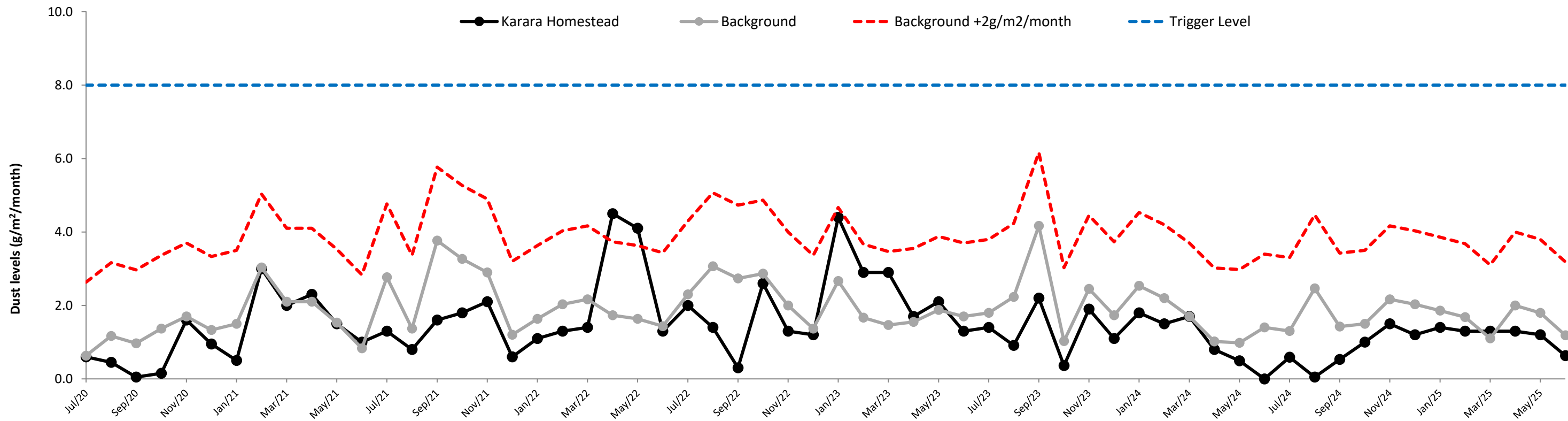


Figure 8: Karara Homestead Monthly Dust Deposition Levels



## **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 Procedure.
- CORP-EN-PRO-1035 –Malleefowl Management and Monitoring Procedure.
- CORP-EN-PRO-1050 – Feral Animal Management and Monitoring Procedure.
- CORP-EN-PLN-1008 – Fauna Management Plan.
- CORP-EN-PRO-1010 – Terrestrial Fauna Management Procedure.

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 monitoring it since 2011 to determine whether mining activities are impacting 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 KML's 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; and
- Control Sites: outside 500m from mining disturbance.

Monitoring is conducted during the breeding season between spring and summer by trained personnel from the KML Environmental Department. It involves a thorough search for WStS and/or its 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 age, contents, and size of scats and latrines, as well as photographs of monitoring sites and scats to adequately determine recent activity or presence of WStS. WStS are classified as present using direct observation, camera trap evidence, or the presence of

scat. Scat evidence is further categorised into fresh or old scats, with fresh scats being stronger indicators of skink activity.

Annual WStS monitoring in the reporting period was undertaken in September and October 2024. A total of 162 sites were monitored, including 74 control sites, 77 impact sites, and 11 translocation sites. Monitoring identified 55 sites with recorded evidence of WStS activities (27 control sites, 27 impact sites and 1 at translocation site) and 107 uninhabited sites (47 control sites, 50 impact sites, and 10 translocation sites) (Figure 9 – Figure 11). The results indicate a slight increase in inhabited logs at impact sites from 21 to 27 logs at the impact sites and slight decrease from 28 to 27 logs at the control sites compared with last year's results (Figure 10). The increased number of inhabited logs could potentially be associated with a significant rainfall of 422.4 mm recorded during the reporting period at Karara Mine Site.

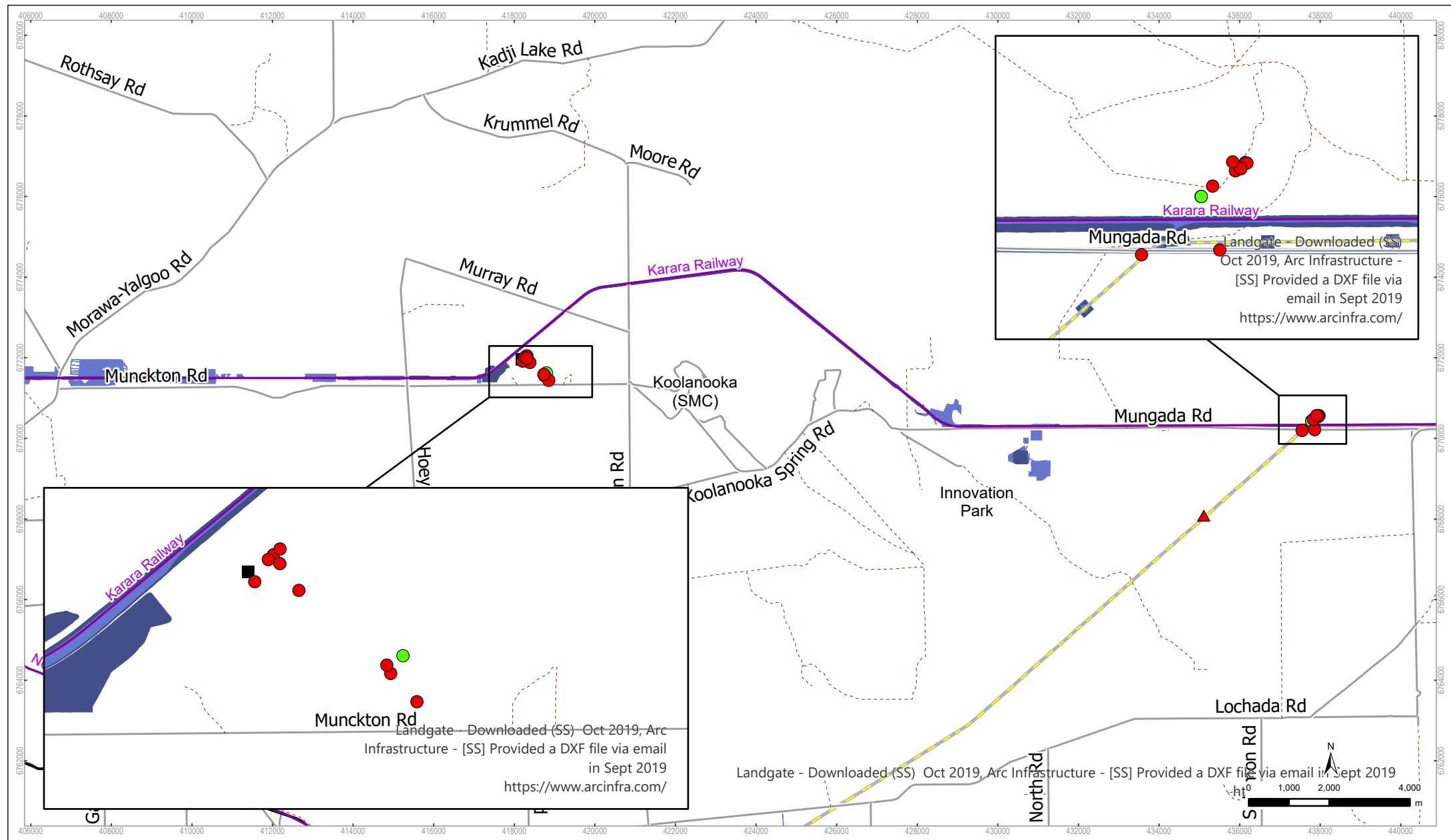
Ongoing WStS monitoring has shown that decline or recovery in skink population is potentially driven by seasonal factors. Further monitoring will be undertaken to determine whether there is a correlation between seasonal factors and WStS populations or if it is more associated with a long-term trend.

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. Similarly, at sites where WStS presence was observed, the indicators of recent activity (fresh scats) were mostly 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 11 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, with presence of WStS (sighting of scats) was observed at 1 translocation site (WSTS 136) during the reporting period.

No mortalities of WStS were recorded during the reporting period.

***Figure 9: WStS Monitoring Locations***

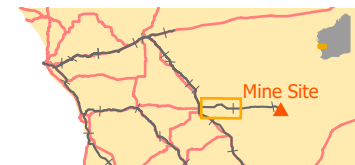


MS Annual Compliance Report  
(2025)

Western Spiny-tailed Skink  
Monitoring 2024/2025

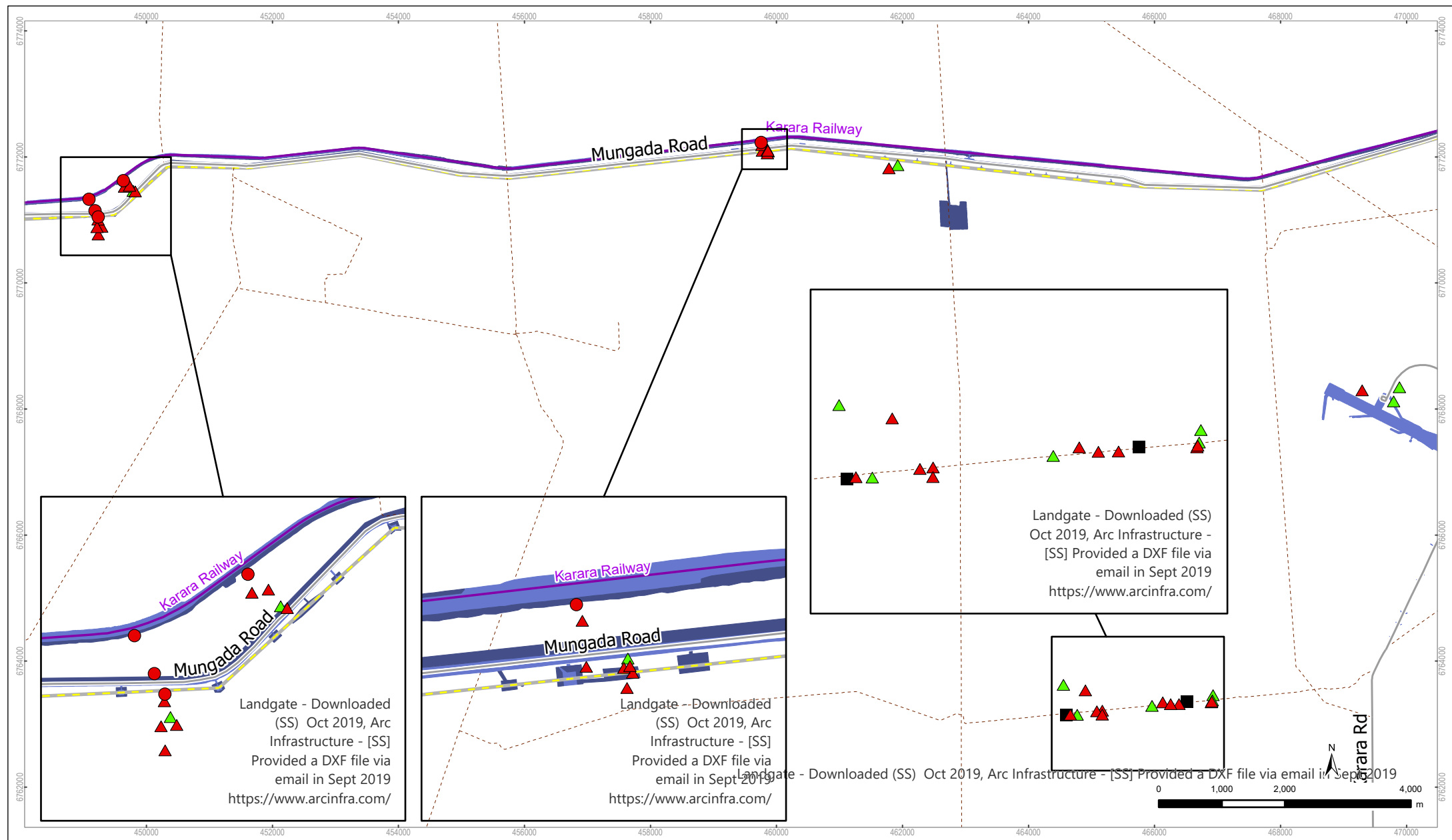
**KARARA**  
MINING LTD

- |                             |                         |                            |
|-----------------------------|-------------------------|----------------------------|
| KML Open Ground Disturbance | Minor                   | Inhabited, Impact          |
| KML Rehabilitation          | Highway                 | Uninhabited, Control       |
| Railway (Freight)           | Track                   | Uninhabited, Impact        |
| Karara Power Transmission   | <b>WSTS Presence</b>    | Uninhabited, Translocation |
| <b>Roads Regional</b>       | <b>Status, SiteType</b> |                            |
| Main                        | Inhabited, Control      |                            |



Ref: K0193 F6  
Version: A  
25 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:125,000  
Size: A4



MS Annual Compliance Report  
(2025)

Western Spiny-tailed Skink  
Monitoring 2024/2025

**KARARA**  
MINING LTD

KML Open Ground Disturbance  
 KML Rehabilitation  
 Railway (Freight)  
 Karara Power Transmission  
 Roads Regional  
 Main

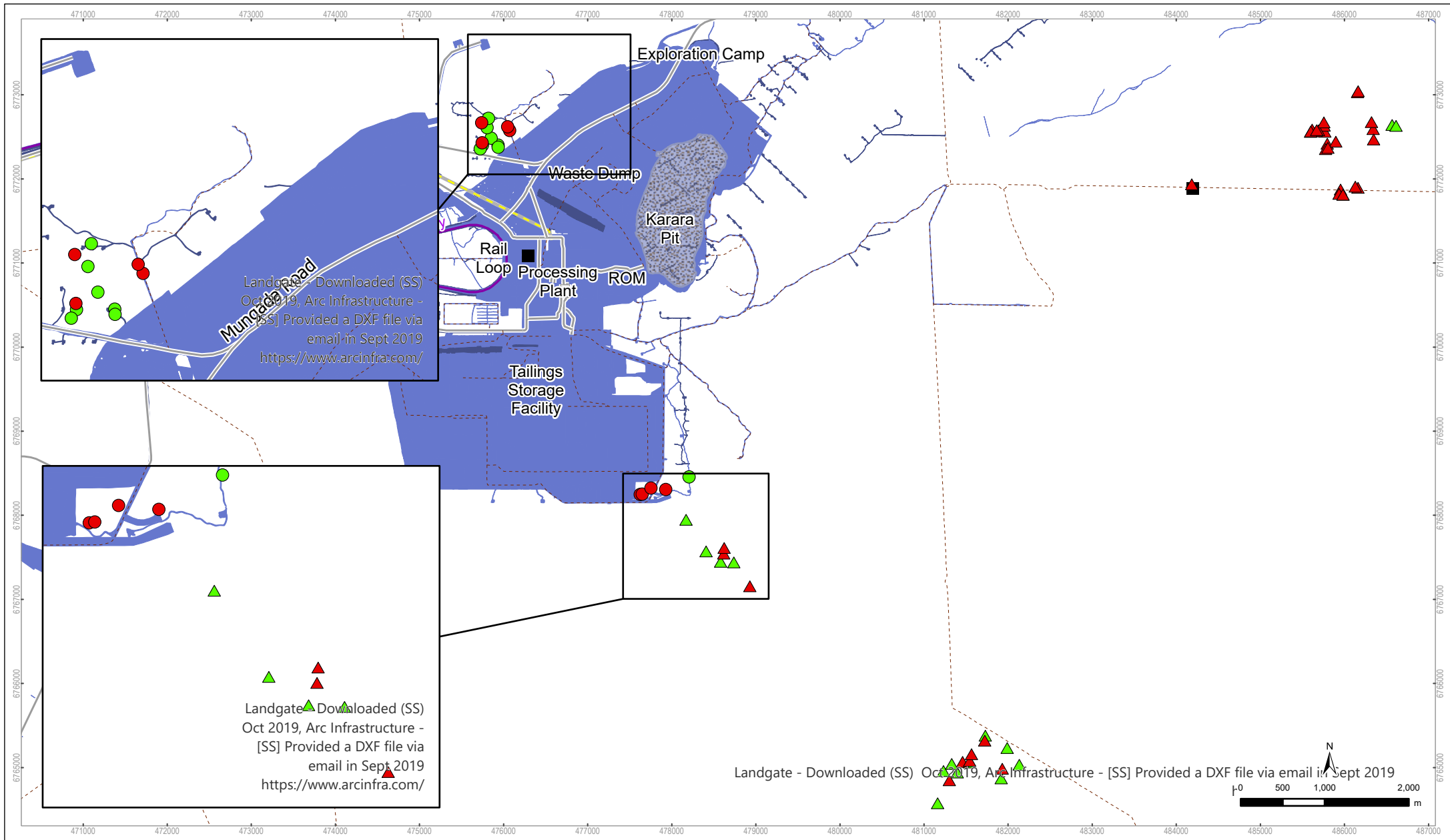
Minor  
 Highway  
 Track  
 WSTS Presence  
 Status, SiteType  
 Inhabited, Control

Inhabited, Impact  
 Uninhabited, Control  
 Uninhabited, Impact  
 Uninhabited, Translocation



Ref: K0193 F7  
 Version: A  
 25 July 2025

Proj: GDA94 MGAZ50  
 Scale: 1:80,000  
 Size: A4



MS Annual Compliance Report  
(2025)

Western Spiny-tailed Skink  
Monitoring 2024/2025

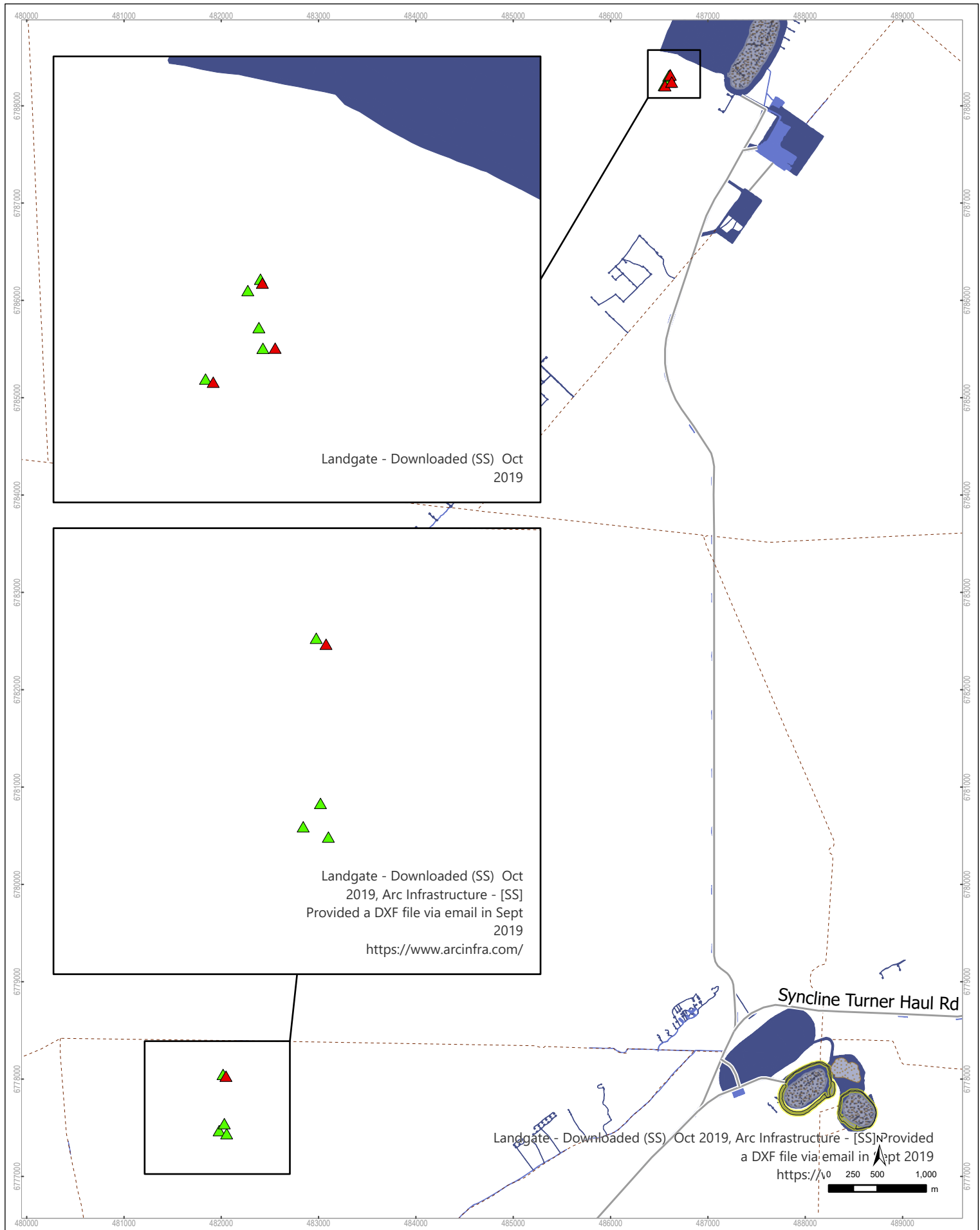
**KARARA**  
MINING LTD

KML Open Ground Disturbance	Minor	Inhabited, Impact
KML Rehabilitation	Highway	Uninhabited, Control
Railway (Freight)	Track	Uninhabited, Impact
Karara Power Transmission	WSTS Presence	Uninhabited, Translocation
Roads Regional	Status, SiteType	
Main	Inhabited, Control	



Ref: K0193 F8  
Version: A  
25 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:60,000  
Size: A4



## MS Annual Compliance Report (2025)

### Western Spiny-tailed Skink Monitoring 2024/2025

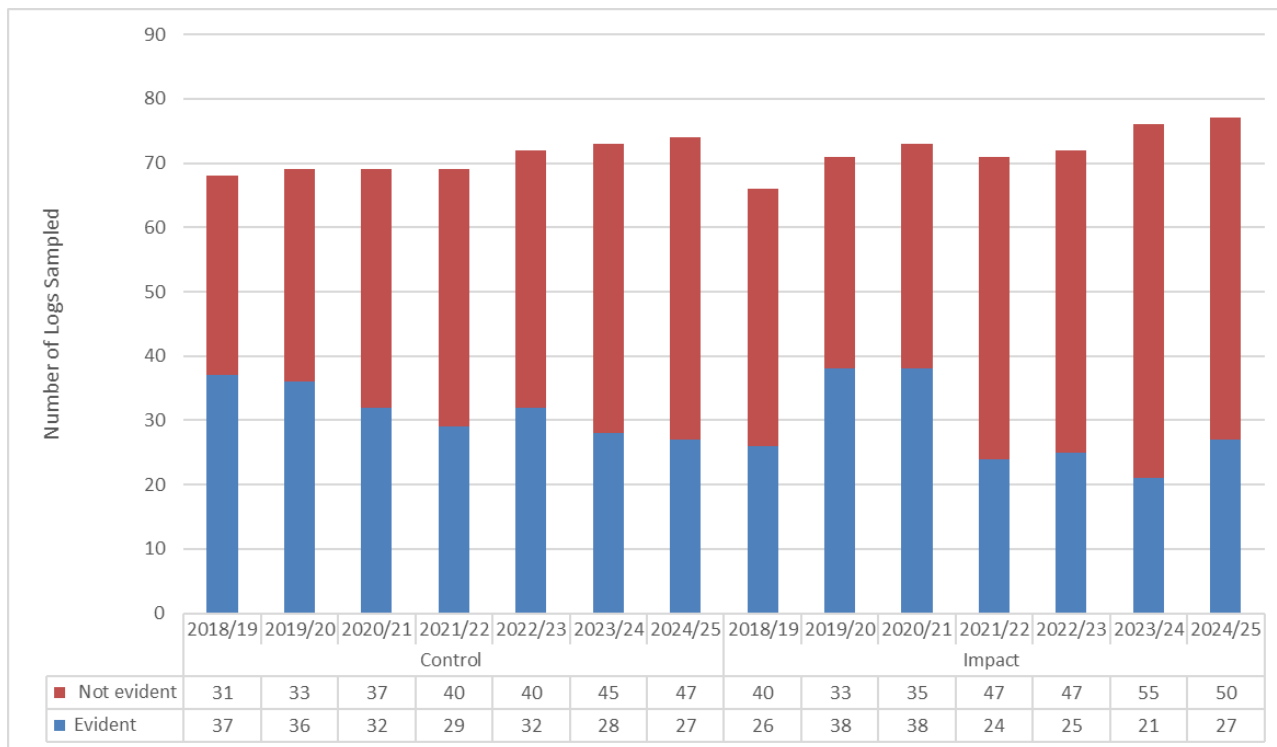
**KARARA**  
MINING LTD

KML Open Ground Disturbance	Minor	Inhabited, Impact
KML Rehabilitation	Highway	Uninhabited, Control
Railway (Freight)	Track	Uninhabited, Impact
Karara Power Transmission	WSTS Presence	Uninhabited, Translocation
Roads Regional	Status, SiteType	
Main	Inhabited, Control	

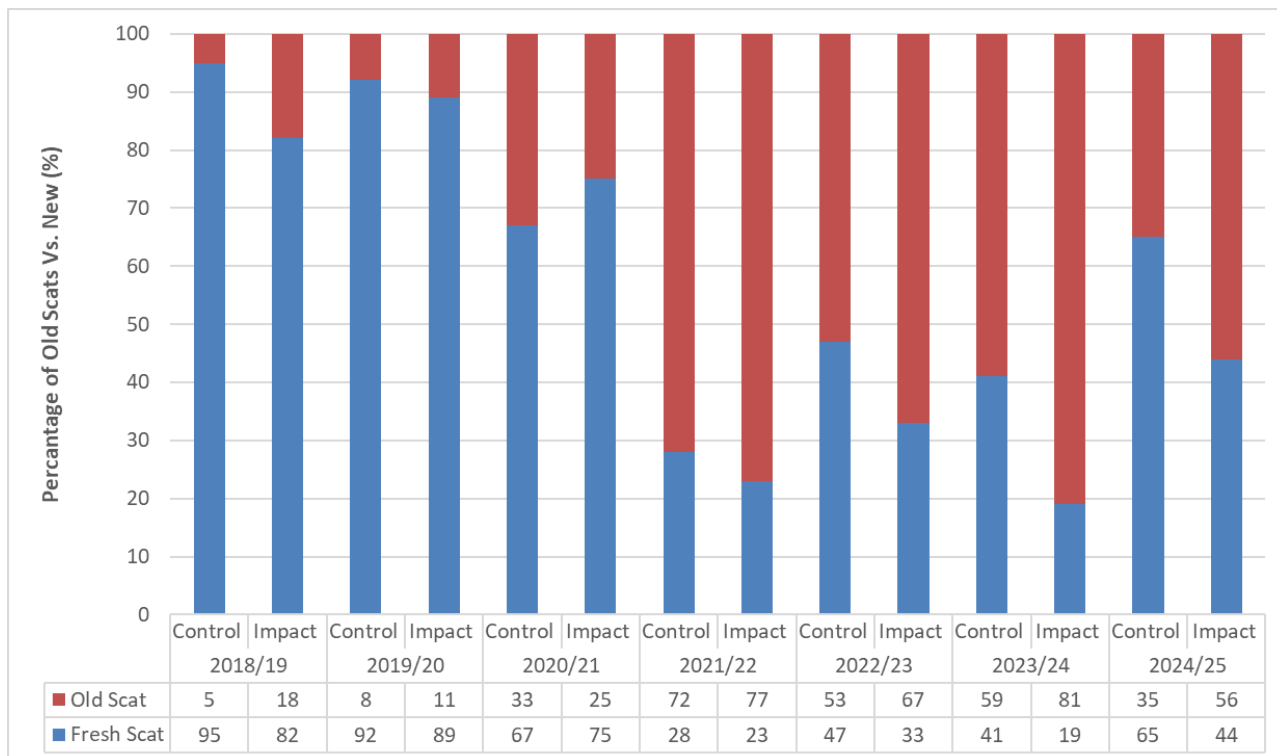


Ref: K0193 F9 Proj: GDA94 MGAZ50  
Version: A Scale: 1:50,000  
25 July 2025 Size: A4

MINISTERIAL STATEMENTS 805, 806 & 968  
ANNUAL COMPLIANCE ASSESSMENT REPORT 2025



**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 has monitored Malleefowl annually since 2008 in accordance with KML's Environmental Procedure - Malleefowl Monitoring and Management (CORP-EN-PRO-1035). In addition, opportunistic observational records of Malleefowl and their mounds are recorded by KML employees and contractors using KML's Fauna Sighting, Relocation, and Mortality Form (CORP-EN-FRM-1045).

Monitoring is conducted by the KML Environmental Department during the Malleefowl breeding season, from 1<sup>st</sup> September until 30<sup>th</sup> April, to gather accurate information on populations and mound activity. KML follows the National Malleefowl Monitoring Manual (National Malleefowl Recovery Team, 2016) to define and determine which mounds should be monitored each year. Mounds that were active in 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 that are close to activity or infrastructure are included in the monitoring schedule.

A total of 106 mounds were surveyed during the reporting period, of which 15 were reported as active (Figure 12). The number of active mounds has increased by approximately 53% compared to last reporting period with 8 active mounds being recorded (Table 2). The increase in the number of active mounds is primarily due to higher rainfall rates. The annual rainfall recorded in 2024 as Karara Mine Site was 422.4 mm, compared to 232.6 mm in 2023.

There were four Malleefowl sightings (five individuals) during the reporting period (Table 2). Overall, the location and number of Malleefowl sightings recorded have remained relatively consistent with historical data.

Two new mounds were identified during the 2024/25 reporting period. Three Malleefowl mortalities were recorded during the reporting period along Mungada Road, a shared road between KML and Kimberley Metals Group (KMG). However, these mortalities were recorded as resulting from KMG's haulage activities.

Approximately 914 mounds of varying status (ranging from ancient to 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 16 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 8 years with an average of 11 active mounds identified per year over the last 16 years.

A spatial analysis of monitoring data shows that Malleefowl have occupied various mounds within operational areas where impacts to Malleefowl activity may be expected, with many sites being used for multiple years over the reporting period. This suggests that Malleefowl are relatively undisturbed by proximity to mining activity.

**Table 2: Malleefowl Monitoring Results 2018-2025**

Year	Mounds Surveyed	Category		% Active mounds	No. Sighted
		Active	Inactive		
2018/2019	89	10	79	13	21
2019/2020	84	10	74	14	24
2020/2021	157	10	147	6	19
2021/2022	88	15	73	17	6
2022/2023	71	19	52	27	18
2023/2024	65	8	57	12	19
2024/2025	106	15	91	14	4

***Figure 12: Malleefowl Mound Monitoring***



### 6.2.3 Shield-Backed Trapdoor Spider Monitoring

The Shield-backed Trapdoor Spider monitoring discontinued in 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. On 13 June 2023 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 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

KML monitors feral animal sightings and trapping activities in accordance with KML's Feral Animal Management and Monitoring Procedure (CORP-EN-PRO-1050). This ensures that feral animal populations remain controlled and do not have a detrimental impact on conservation-significant flora and fauna, as well as other native species inhabiting 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 have decreased significantly during this reporting period (refer to Table 3).

**Table 3: Feral Animals Sighted Between 2018-2025**

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
2024/2025	12	1	0	0

A summary of the feral animals trapped over the past eight years is provided in Table 4. Sightings and trapping of feral fauna have remained relatively consistent with historical data.

**Table 4: Feral Animals Trapped Between 2017-2025**

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
2021/2022	21	0	0
2022/2023	9	0	0
2023/2024	17	0	0
2024/2025	8	0	0

### 6.3 Fauna Mortalities

To comply with Condition 10.2 of MS 805, Condition 9.2 of MS 806, and KML's Terrestrial Fauna Management Procedure (CORP-EN-PRO-1010), KML maintains a register of fauna mortalities related to the mining activities. The KML's Fauna Management Plan (CORP-EN-PRO-1008) also requires all KML personnel and contractors on site to report all fauna vehicle strikes or deaths caused by mining operation activities to the KML Environment Department for inclusion in the fauna mortality register via the Fauna Sighting, Relocation, and Mortality Form (CORP-EN-FRM-1045).

During this reporting period a total of ten fauna mortalities were reported on the KML tenements (Table 5). Vehicle strikes accounted for most known causes of death, with two mortalities recorded as a result of kangaroos caught on a fence. Macropods were the most common species struck on the site roads. Three Malleefowl mortalities occurred during the reporting period resulted from external company (KMG) hauling activities. 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.

Recorded fauna mortalities were significantly lower in this reporting period compared to last reporting period, being 43 mortalities recorded in 2023/24 compared to 10 mortalities recorded in 2024/25.

Fauna mortality records over the last seven years are still relatively low in comparison to the total man-hours and vehicle/train movements associated with the Project operations.

**Table 5: Fauna Mortalities**

Species	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	Total Individuals
<b>EPBC Listed</b>									
Malleefowl ( <i>Leipoa ocellata</i> )	1	0	0	0	2	2	1	3	9
Western Spiny-tailed Skink ( <i>Egernia stokesii badia</i> )	1	0	0	0	0	0	0	0	1
<b>Birds</b>									
Australian hobby ( <i>Falco longipennis</i> )	0	0	0	0	0	1	0	0	1
Australian bustard ( <i>Ardeotis australis</i> )	1	0	0	0	0	1	0	0	2
Black swan ( <i>Cygnus atratus</i> )	0	0	0	0	0	0	1	0	1
Bronzewing ( <i>Phaps chalcoptera</i> )	0	0	0	0	0	7	0	0	7
Brown falcon ( <i>Falco berigora</i> )	1	0	0	0	0	0	1	0	2
Emu ( <i>Dromaius novaehollandiae</i> )	2	0	1	4	1	2	1	0	11
Grey teal duck ( <i>Anas gracilis</i> )	1	0	0	0	0	0	1	0	2
Major Mitchell's cockatoo ( <i>Lophochroa leadbeateri</i> )	0	0	1	0	0	0	0	0	1
Magpie lark ( <i>Grallina cyanoleuca</i> )	1	0	0	0	0	0	0	0	1
Parrot sp. ( <i>Psitttrichasiidae</i> sp.)	0	1	0	0	1	2	0	0	4
Red-tailed black cockatoo ( <i>Calyptorhynchus banksii</i> )	1	0	0	0	0	1	0	0	2

MINISTERIAL STATEMENTS 805, 806 & 968  
ANNUAL COMPLIANCE ASSESSMENT REPORT 2025

Species	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	Total Individuals
Sparrow ( <i>Passer domesticus</i> )	0	0	0	0	0	1	0	0	1
Spotted nightjar ( <i>Eurostopodus argus</i> )	1	0	0	0	0	0	1	0	2
Unknown bird	0	1	0	1	0	5	4	0	11
Welcome Swallow ( <i>Hirundo neoxena</i> )	0	0	0	0	0	4	0	0	4
<b>Reptiles</b>									
Bungarra ( <i>Varanus gouldii</i> )	0	0	0	0	0	4	4	0	8
Gwardar ( <i>Pseudonaja nuchalis</i> )	1	0	1	0	0	2	2	0	6
Jan's banded snake ( <i>Simoselaps bertholdi</i> )	0	1	0	0	0	0	0	0	1
Monitor lizard ( <i>Varanus sp.</i> )	0	1	2	0	0	1	1	0	5
Mulga snake ( <i>Pseudechis australis</i> )	0	1	2	1	1	0	0	0	5
Perentie ( <i>Varanus giganteus</i> )	0	1	0	0	1	0	1	0	3
Stimsons python ( <i>Antaresia stimsoni</i> )	0	0	0	0	1	0	0	0	1
Unknown snake	0	0	0	1	0	0	1	0	2
<b>Other Terrestrial Fauna</b>									
Echidna ( <i>Trachyglossidae sp.</i> )	0	0	0	1	2	0	1	0	4
Kangaroo ( <i>Macropus sp.</i> )	26	24	18	20	17	35	17	8	165
Unknown bat	0	0	1	0	0	1	0	0	2
<b>Feral Fauna</b>									
Cat ( <i>Felis catus</i> )	0	1	0	0	0	1	1	0	3
Goat ( <i>Capra hircus</i> )	0	0	1	0	0	0	0	0	1
Rabbit ( <i>Oryctolagus cuniculus</i> )	0	0	0	0	0	7	5	0	12
<b>Total Individuals</b>	<b>37</b>	<b>31</b>	<b>27</b>	<b>28</b>	<b>26</b>	<b>77</b>	<b>43</b>	<b>10</b>	<b>279</b>
<b>Total number of species</b>	<b>11</b>	<b>8</b>	<b>8</b>	<b>7</b>	<b>8</b>	<b>17</b>	<b>16</b>	<b>2</b>	<b>77</b>



## 6.4 Flora Management

During the reporting period, KML undertook management of flora and vegetation 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 MS 805 and MS 806 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; and
- CORP-EN-PRO-1004 – Approvals Requests and Ground Disturbance Procedure.

During the reporting period monitoring data was collected in September. A total of 30 monitoring quadrats (20 m by 20 m) 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:

- Weed coverage;
- Dust impact;
- Saline water impact;
- Feral fauna grazing impact;

- Erosion;
- Drought stress; and
- Fire impact.

Threats to vegetation health are monitored at each quadrat and assessed against KML'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 the DWER on 9 November 2021 in response to the request for a more accurate representation of vegetation health data following the DWER's audit of Condition 6.2 of MS 805 and MS 806 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:

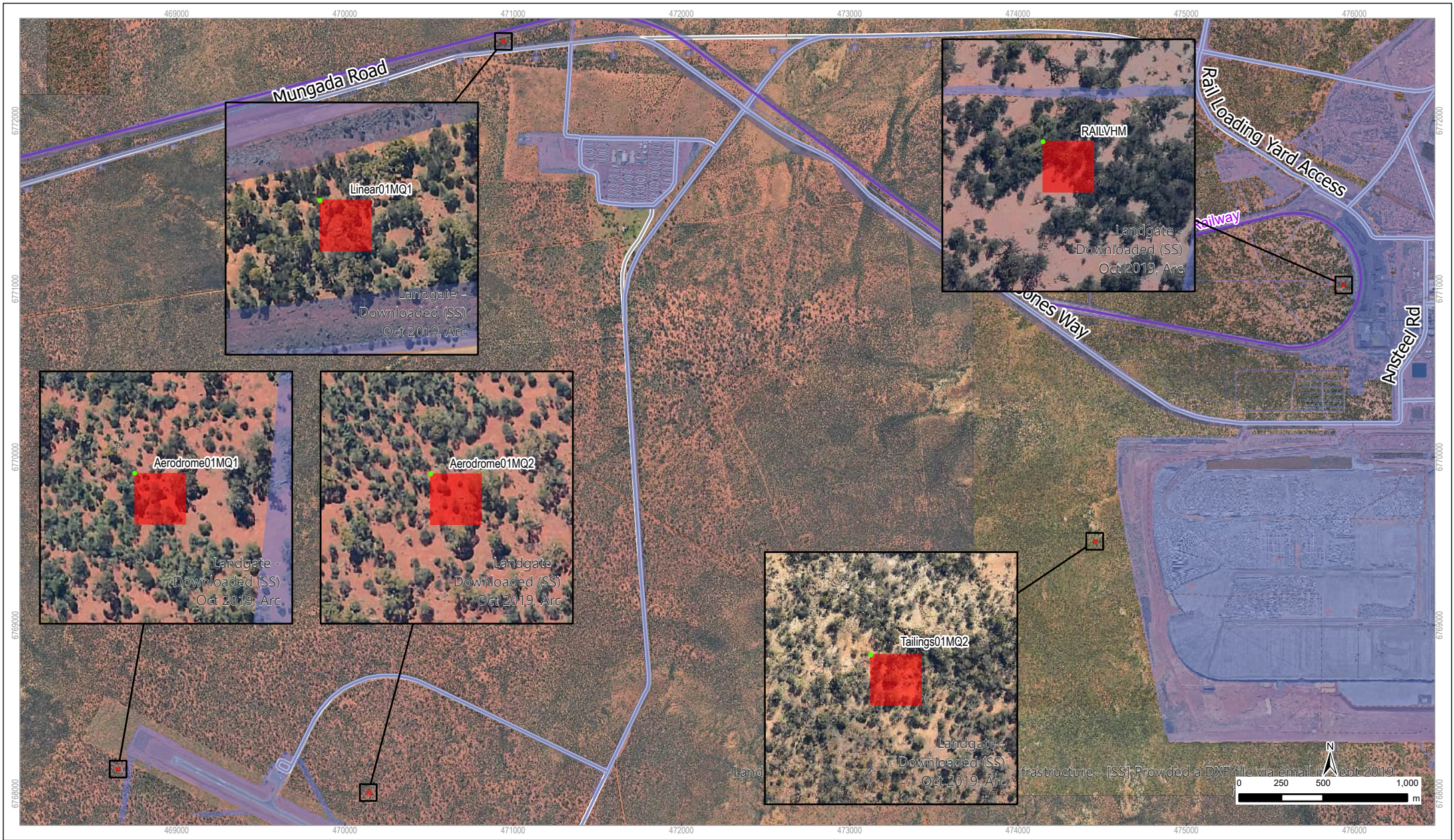
- **Trigger Criteria:** Condition rating of very good (3) **AND** no change detected at relevant control site.

- **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  
(2025)

**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 Rehabilitation



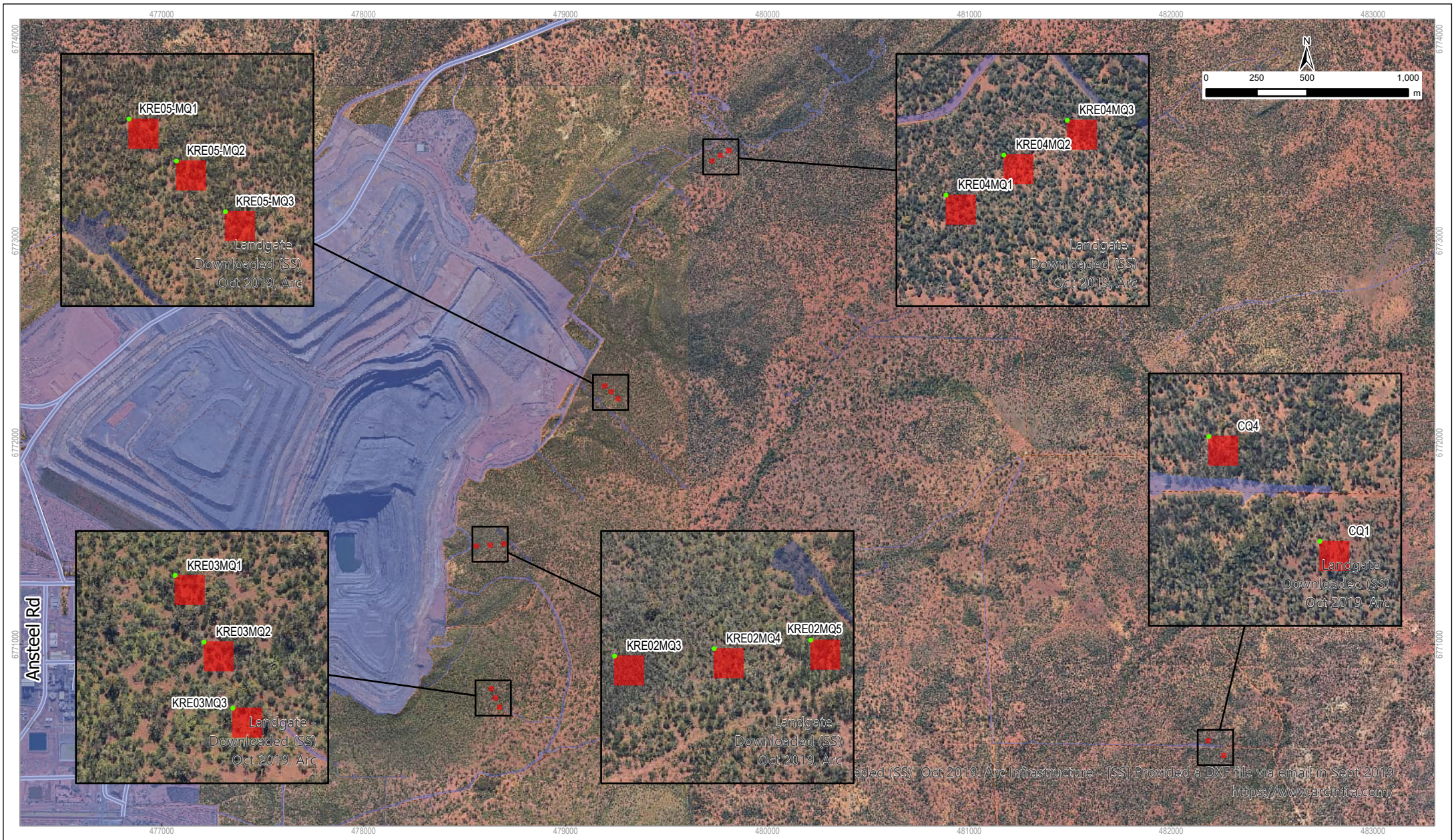
Ref: K0193 F10  
Version: A  
25 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:30,000  
Size: A4



***Figure 14: Vegetation Health Monitoring Quadrats at KIOP2***





- 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



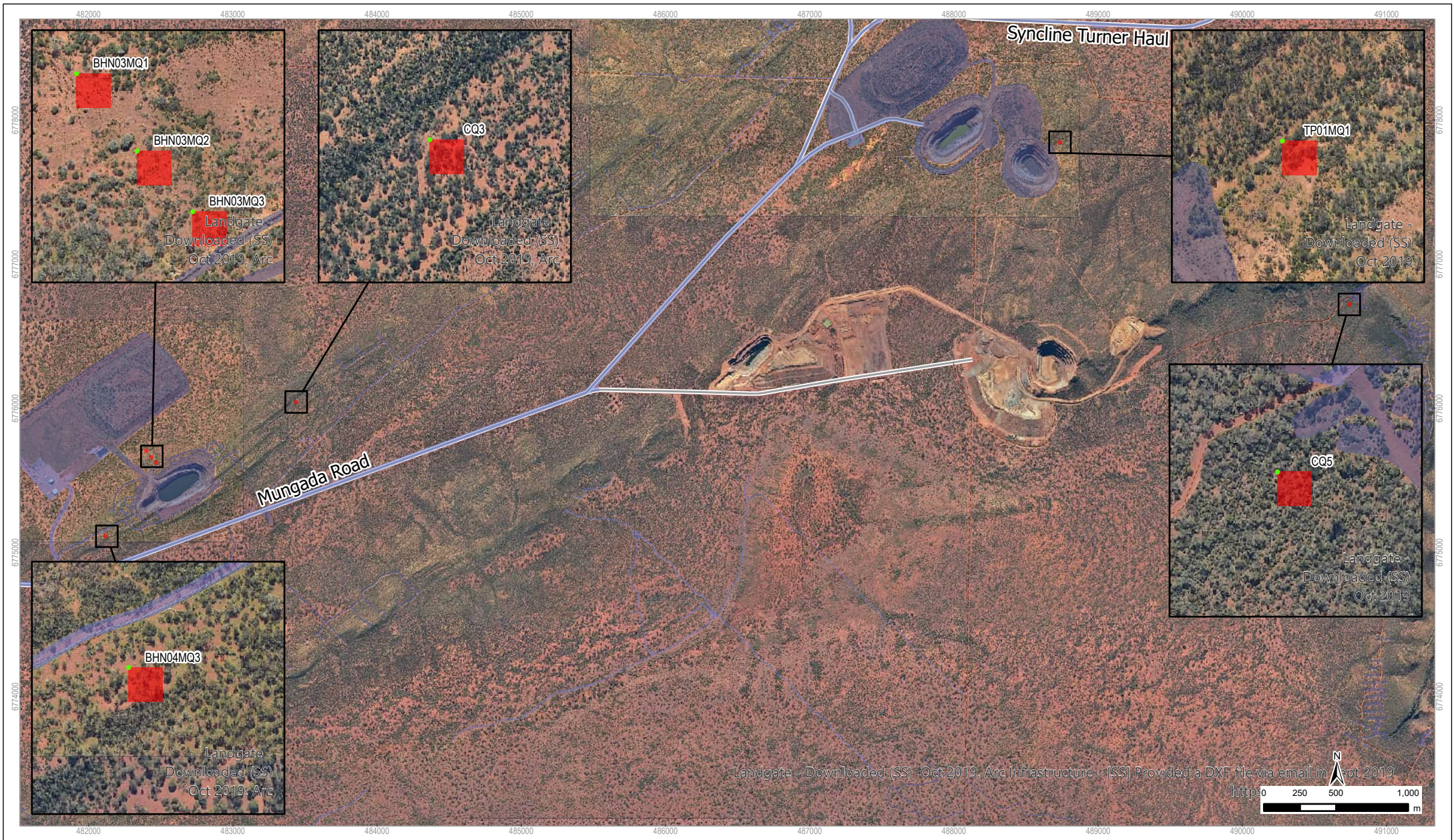
Ref: K0193 F11  
Version: A  
28 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:25,000  
Size: A4



***Figure 15: Vegetation Health Monitoring Quadrats at MIOP***





MS Annual Compliance Report  
(2025)

**Vegetation Health Monitoring  
Quadrats at MIOP**

**KARARA**  
MINING LTD

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



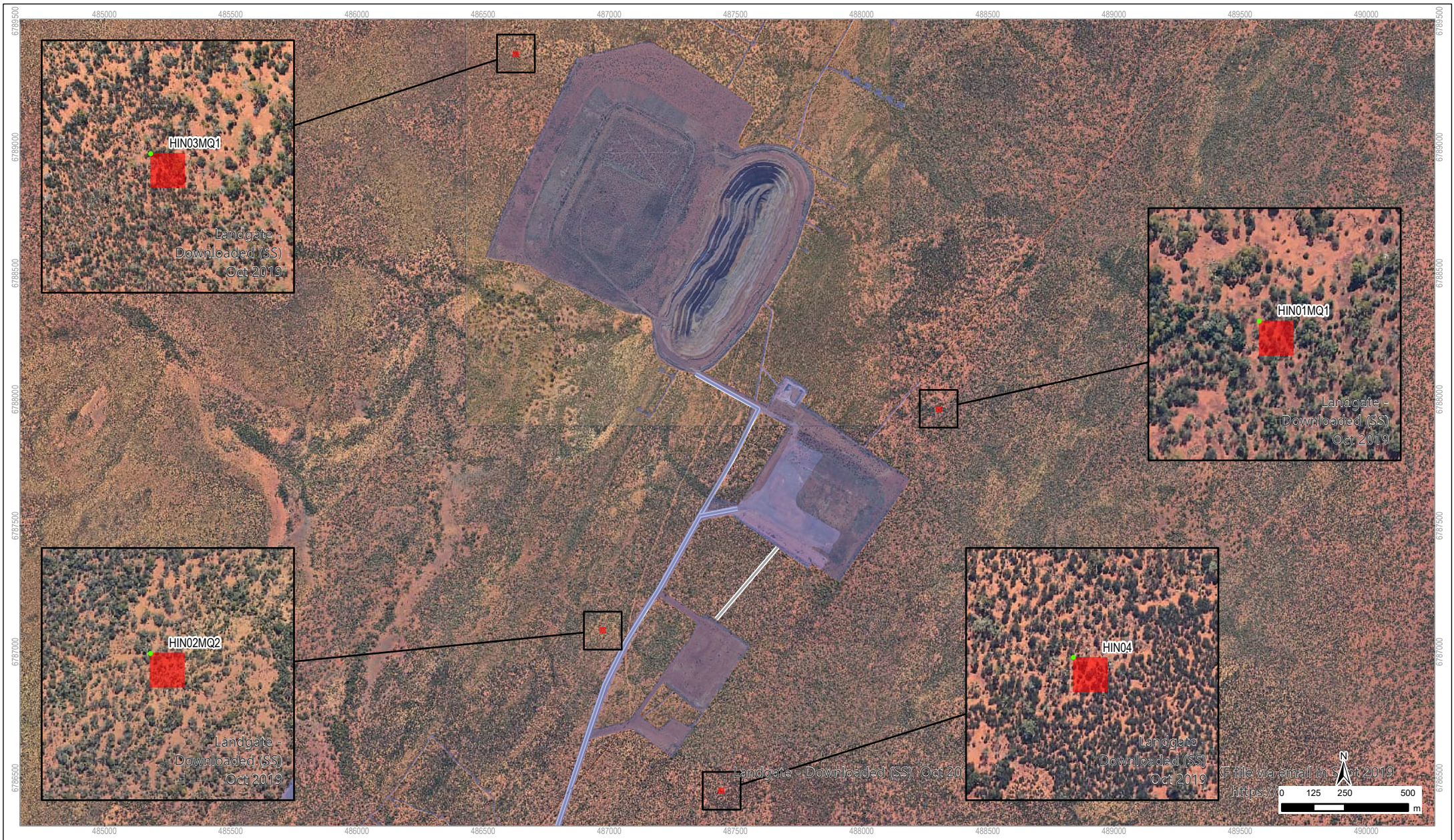
Ref: K0193 F12  
Version: A  
28 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:35,000  
Size: A4



***Figure 16: Vegetation Health Monitoring Quadrats at HIOP***



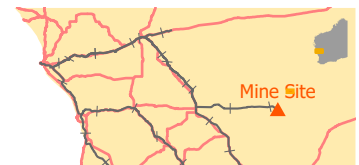


## MS Annual Compliance Report (2025)

### Vegetation Health Monitoring Quadrats at HIOP

**KARARA**  
MINING LTD

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



Ref: K0193 F13  
Version: A  
28 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:20,000  
Size: A4



## 6.4.1.1 Weed Coverage

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, the monitoring sites recorded weed percentage cover ratings ranging from 1 (less than 1% of weeds) to 2 (1-15%, at TP01MQ1 only) (see 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; therefore, no responsive actions were required in relation to weed coverage.

**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	Sep-24
MIOP	BHN03MQ1	1	1	1	1	1	1	1
	BHN03MQ2	1	1	1	1	1	1	1
	BHN03MQ3	1	1	1	1	1	1	1
	BHN04MQ3	1	1	1	1	1	1	1
	TP01MQ1	1	1	1	1	1	1	2
	CQ3 (analogue)	1	1	1	1	1	1	1
	CQ5 (analogue)	1	1	1	1	1	1	1
HIOP	HIN01MQ1	1	1	1	1	1	1	1
	HIN02MQ2	1	1	1	1	1	1	1
	HIN03MQ1	1	1	1	1	1	1	1
	HIN04 (analogue)	1	1	1	1	1	1	1
KIOP	AERODROME01MQ1	1	1	1	1	1	1	1
	AERODROME01MQ2	1	1	1	1	1	1	1
	KRE02MQ3	1	1	1	1	1	1	1
	KRE02MQ4	1	1	1	1	1	1	1
	KRE02MQ5	1	1	1	1	1	1	1
	KRE03MQ1	1	1	1	1	1	1	1
	KRE03MQ2	1	1	1	1	1	1	1

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23	Sep-24
	KRE03MQ3	1	1	1	1	1	1	1
	KRE04MQ1	1	1	1	1	1	1	1
	KRE04MQ2	1	2	1	1	1	1	1
	KRE04MQ3	2	2	1	1	1	1	1
	KRE05MQ1	-	1	1	1	1	1	1
	KRE05MQ2	-	1	1	1	1	1	1
	KRE05MQ3	-	1	1	1	1	1	1
	LINEAR01MQ1	1	1	1	1	1	1	1
	TAILINGS01MQ2	1	1	2	1	1	1	1
	RAILVHM	1	1	2	2	2	1	1
	CQ1 (analogue)	1	1	1	1	1	1	1
	CQ4 (analogue)	1	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. Furthermore, dust coverage rating at TAILINGS01MQ2 is recorded to be 3 (moderate), which is consistent with last year's results.

Local dust storms and reduced stockpile moisture/watering at the rail loop (TLO) may potentially cause the increased dust coverage at quadrat RAILVHM. Strong winds during the reporting period 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 the 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 the Flora and Vegetation Health Monitoring Plan.

**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	Sep-24
MIOP	BHN03MQ1	1	1	1	1	1	1	1
	BHN03MQ2	1	1	1	1	1	1	1
	BHN03MQ3	1	1	1	1	1	1	1
	BHN04MQ3	1	1	1	1	1	1	1
	TP01MQ1	1	1	1	1	1	1	1
	CQ3 (analogue)	1	1	1	1	1	1	1
	CQ5 (analogue)	1	1	1	1	1	1	2
HIOP	HIN01MQ1	1	1	1	1	1	1	1
	HIN02MQ2	1	1	1	1	1	1	1
	HIN03MQ1	1	1	1	1	1	1	1
	HIN04 (analogue)	1	1	1	1	1	1	1
KIOP	AERODROME01MQ1	1	1	1	1	1	1	1
	AERODROME01MQ2	1	1	1	1	1	1	1
	KRE02MQ3	4	2	4	4	2	4	2
	KRE02MQ4	4	1	2	4	2	3	2
	KRE02MQ5	3	1	2	3	1	3	1
	KRE03MQ1	3	2	2	4	2	3	2
	KRE03MQ2	3	1	2	4	1	3	2
	KRE03MQ3	3	1	2	4	2	3	1
	KRE04MQ1	1	1	1	1	1	2	1
	KRE04MQ2	1	1	1	1	1	1	1
	KRE04MQ3	1	1	1	1	1	1	1

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23	Sep-24
	KRE05MQ1	-	1	2	2	1	1	1
	KRE05MQ2	-	1	2	2	1	1	1
	KRE05MQ3	-	1	2	1	1	1	1
	LINEAR01MQ1	1	1	2	2	1	1	1
	TAILINGS01MQ2	1	1	3	3	1	3	3
	RAIL VHM	4	4	5	5	5	5	5
	CQ1 (analogue)	1	1	1	1	1	1	1
	CQ4 (analogue)	1	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, most sites recorded salinity rating of 1 (non-saline) as shown in Table 8. Low salinity (rating of 2) was recorded at BHN03MQ2 (28 mS/m) and CQ3 (37 mS/m), while moderate salinity (rating of 3) was observed at BHN03MQ3 (62 mS/m) and BHN04MQ3 (87 mS/m). BHN03MQ3 and BHN04MQ3 quadrats showed an increase in salinity rating from 'low' (rating of 2) and 'nil' (rating of 1) respectively to 'moderate' (rating of 3) compared to last year's reporting period; however, no visual evidence of salt staining on soil or foliage was recorded at the quadrats. Vegetation condition at BHN04MQ3 was recorded as 'excellent' (rating of 2) and 'very good' (rating of 3) at BHN03MQ3. BHN03MQ2 showed increase in salinity from 'non-saline' (rating of 1) to 'low' (rating of 2). Salinity rating at analogue site CQ3 remained consistent with previous year rating of 2 ('low'). Overall, soil salinity levels have remained constant across the monitoring sites, except for BHN03MQ3 and BHN04MQ3. This indicates that potential water overspray for dust suppression mostly did not impact 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	Sep-24
MIOP	BHN03MQ1	1	1	1	1	1	1	1
	BHN03MQ2	1	1	1	1	1	1	2
	BHN03MQ3	1	1	1	1	1	1	3
	BHN04MQ3	1	1	1	2	1	2	3
	TP01MQ1	1	2	3	1	2	1	1
	CQ3 (analogue)	1	2	1	3	3	2	2
	CQ5 (analogue)	1	1	1	1	1	1	1
HIOP	HIN01MQ1	1	1	1	1	1	1	1
	HIN02MQ2	1	1	1	1	1	1	1
	HIN03MQ1	1	1	1	1	1	1	1
	HIN04 (analogue)	1	1	1	1	1	1	1
KIOP	AERODROME01MQ1	1	1	1	1	1	1	1
	AERODROME01MQ2	1	1	1	1	1	1	1
	KRE02MQ3	1	1	1	1	1	1	1
	KRE02MQ4	1	1	1	1	1	1	1
	KRE02MQ5	1	1	1	1	1	1	1
	KRE03MQ1	1	1	1	1	1	1	1
	KRE03MQ2	1	1	1	1	1	1	1
	KRE03MQ3	1	1	1	1	1	1	1
	KRE04MQ1	1	1	1	1	1	1	1
	KRE04MQ2	1	1	1	1	1	1	1
	KRE04MQ3	1	1	1	1	1	1	1
	KRE05MQ1	-	1	1	1	1	1	1
	KRE05MQ2	-	1	1	1	1	1	1
	KRE05MQ3	-	1	1	1	1	1	1



Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23	Sep-24
	LINEAR01MQ1	1	1	1	1	2	1	1
	TAILINGS01MQ2	1	1	1	1	1	1	1
	RAILVHM	1	1	1	1	1	1	1
	CQ1 (analogue)	1	1	1	2	1	1	1
	CQ4 (analogue)	1	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 evidence of grazing by feral animals (Table 9). No trigger or threshold criteria were exceeded; therefore, feral animal grazing is not considered to impact vegetation health. Furthermore, feral fauna 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	Sep-24
MIOP	BHN03MQ1	1	2	1	1	2	2	1
	BHN03MQ2	1	1	1	1	1	1	1
	BHN03MQ3	1	1	1	1	1	1	1
	BHN04MQ3	1	1	1	1	1	1	1
	TP01MQ1	1	1	1	1	1	1	1
	CQ3 (analogue)	1	1	1	1	1	1	1
	CQ5 (analogue)	1	1	2	2	1	1	1
HIOP	HIN01MQ1	2	2	1	1	1	1	1
	HIN02MQ2	2	1	1	1	1	1	1
	HIN03MQ1	1	1	1	1	1	1	1
	HIN04 (analogue)	2	2	1	1	1	1	1

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23	Sep-24
KIOP	AERODROME01MQ1	2	1	2	1	1	2	1
	AERODROME01MQ2	1	2	2	1	1	2	1
	KRE02MQ3	1	1	1	1	1	1	1
	KRE02MQ4	1	1	1	1	1	1	1
	KRE02MQ5	1	2	1	1	1	1	1
	KRE03MQ1	2	1	1	1	1	1	1
	KRE03MQ2	1	1	1	1	1	1	1
	KRE03MQ3	1	2	1	1	1	1	1
	KRE04MQ1	1	1	1	1	1	1	1
	KRE04MQ2	2	1	1	1	1	1	1
	KRE04MQ3	2	1	1	1	1	1	1
	KRE05MQ1	-	1	1	1	1	1	1
	KRE05MQ2	-	1	1	1	1	1	1
	KRE05MQ3	-	1	1	1	1	1	1
	LINEAR01MQ1	1	1	1	1	1	2	1
	TAILINGS01MQ2	1	1	1	1	1	1	1
	RAILVHM	1	1	1	1	1	2	1
	CQ1 (analogue)	2	1	1	1	1	1	1
	CQ4 (analogue)	1	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, 25 out the 30 quadrats recorded no evidence of erosion; four quadrats recorded erosion scores of 'low' (0 - 5% of topsoil loss) at BHN03MQ2, KRE03MQ1, KRE03MQ2 and KRE03MQ3; and score of 'moderate' (>5 - 15% of topsoil loss) was recorded at BHN03MQ1 (Table 10). These sites will continue to be monitored for any potential increase of erosion.

The BHN03MQ1 quadrat erosion score has remained unchanged with value of 3 (moderate) since 2022 reporting period. This sustained moderate erosion score could be potentially associated with the active erosive process along channels, back cutting, sedimentation behind the adjacent coir logs and several diggings most likely caused by rabbits. Furthermore, the vegetation condition recorded at BHN03MQ1 was rated as 'very good' (score of 3).

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	Sep-24
MIOP	BHN03MQ1	2	2	2	2	3	3	3
	BHN03MQ2	1	2	1	2	1	2	2
	BHN03MQ3	1	1	1	1	1	1	1
	BHN04MQ3	1	1	1	1	1	1	1
	TP01MQ1	1	2	2	1	1	1	1
	CQ3 (analogue)	1	1	1	1	1	1	1
	CQ5 (analogue)	1	1	1	1	1	1	1
HIOP	HIN01MQ1	1	1	1	1	1	1	1
	HIN02MQ2	1	1	1	1	1	1	1
	HIN03MQ1	1	1	1	1	1	1	1
	HIN04 (analogue)	1	1	1	1	2	1	1
KIOP	AERODROME01MQ1	1	1	1	1	1	1	1
	AERODROME01MQ2	1	1	1	2	1	1	1
	KRE02MQ3	1	1	1	1	1	1	1
	KRE02MQ4	1	1	1	1	1	1	1
	KRE02MQ5	1	1	1	1	1	1	1
	KRE03MQ1	1	1	2	1	2	2	2
	KRE03MQ2	2	2	2	3	2	3	2

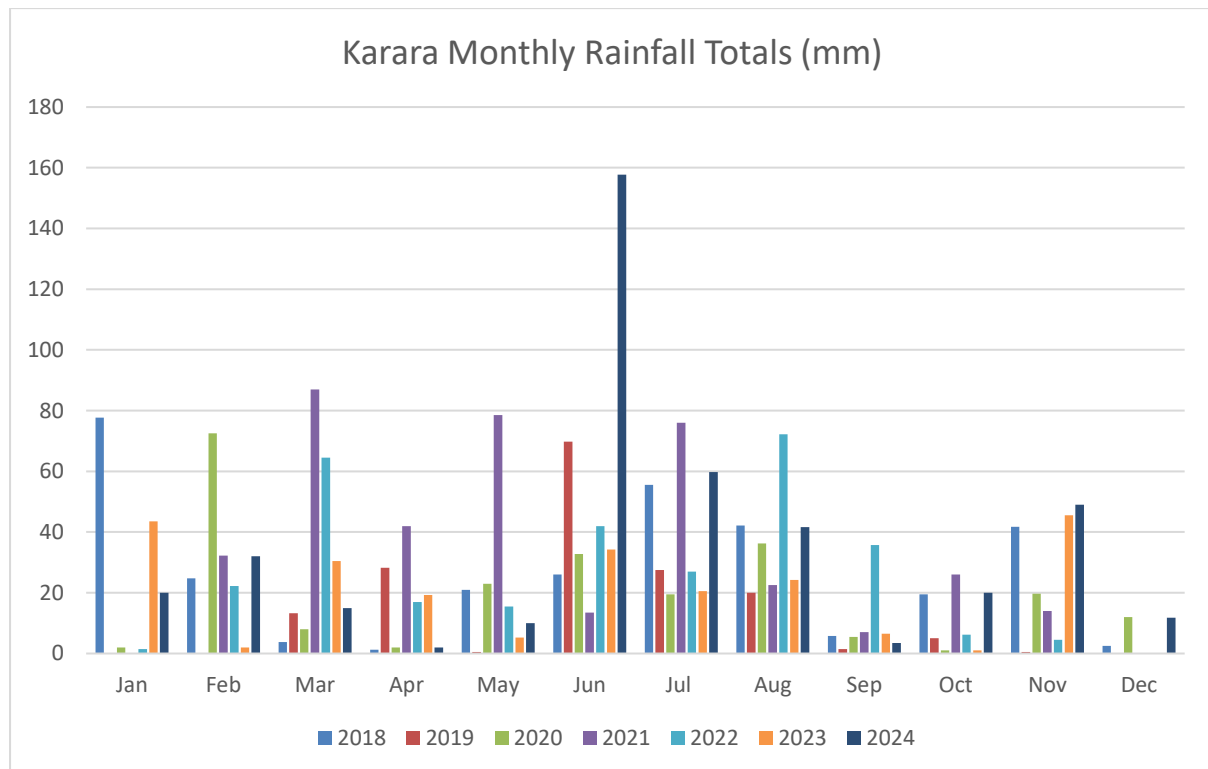
Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23	Sep-24
	KRE03MQ3	1	1	1	1	2	2	2
	KRE04MQ1	1	1	1	1	1	2	1
	KRE04MQ2	1	1	1	1	1	2	1
	KRE04MQ3	1	1	1	1	1	1	1
	KRE05MQ1	-	1	1	1	1	1	1
	KRE05MQ2	-	1	1	1	1	1	1
	KRE05MQ3	-	1	1	2	1	1	1
	LINEAR01MQ1	1	1	1	1	1	1	1
	TAILINGS01MQ2	1	1	1	1	1	1	1
	RAILVHM	1	1	1	1	2	1	1
	CQ1 (analogue)	1	1	1	1	1	1	1
	CQ4 (analogue)	1	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.*

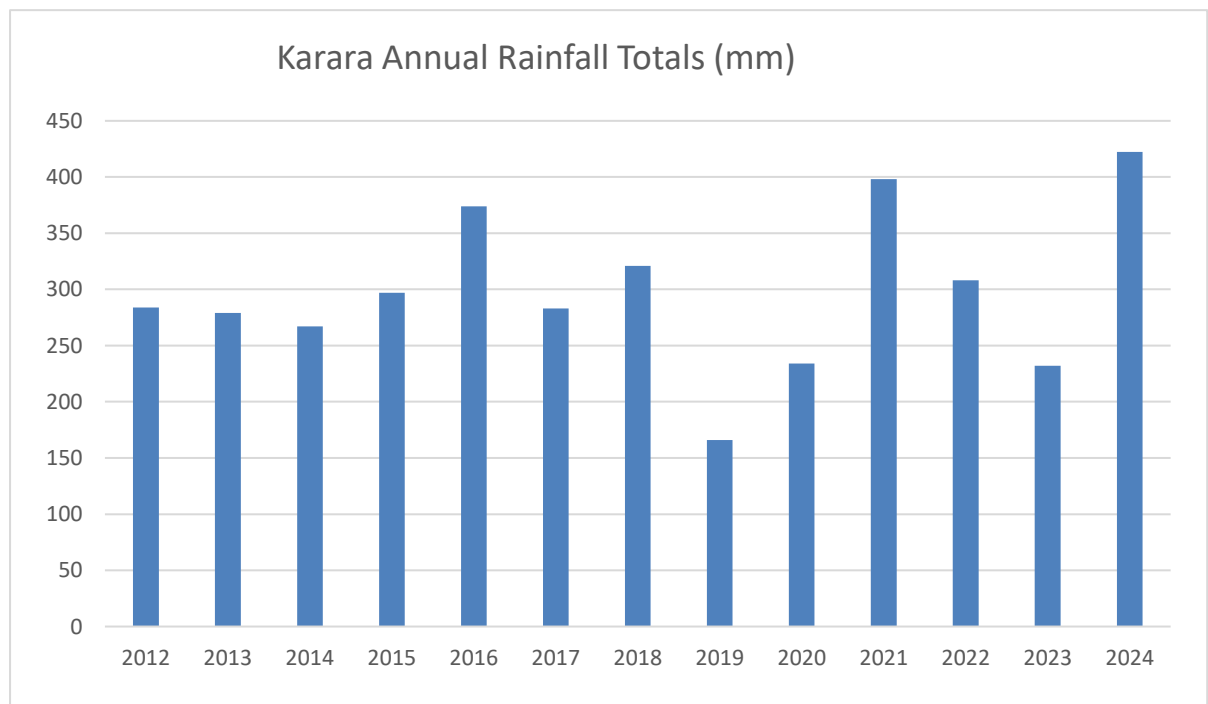
## 6.4.1.6 Rainfall and Climate

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 Mid-West region, where the Karara Mine Site is located, has experienced a long-term decline in winter rainfall over several decades. Occasionally, this deficit is partially offset by remnants of tropical low-pressure systems that bring summer rainfall; however, these systems tend to be less reliable and more spatially variable than the rain-bearing cold fronts. The Karara Mine Site recorded particularly dry conditions in 2019, 2020 and 2023, while a recovery of total annual rainfall was recorded in 2021, 2022 and 2024 (Figure 18). In 2024, the total annual rainfall was 422.35 mm — the highest recorded in the past decade.



**Figure 17: Monthly Rainfall for the Karara Mine Site (2018 – 2024)**



**Figure 18: Annual Rainfall for the Karara Mine Site (2012 – 2024)**

## 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, 12 of 30 quadrats recorded a vegetation condition rating of 'excellent' (2), 17 quadrats recorded a rating of 'very good' (3) and the remaining quadrat (RAILVHM) recorded a rating of 'good' (4) (see Table 11). 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.

HIN02MQ2 quadrat has recorded a slight decline in vegetation condition rating from 'excellent' (2) to 'very good' (3), primarily due to climatic factors such as draught stress rather than mining impacts.

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 improvement in vegetation condition rating from 'very good' (3) to 'excellent' (2).

Vegetation condition rating at HIN01MQ1, HIN03MQ1, HIN04, AERODROME01MQ1 and AERODROME01MQ2 quadrats remained unchanged with a rating of 'Very Good' (3) compared to last year's monitoring.

Compared to the previous year, an overall improvement in vegetation condition was observed, corresponding to the significantly higher rainfall recorded in 2024 (Figure 18).

**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	Sep-24
MIOP	BHN03MQ1	3	3	3	3	3	4	3
	BHN03MQ2	3	3	2	3	3	3	3
	BHN03MQ3	3	3	2	2	2	3	3
	BHN04MQ3	2	2	2	2	2	2	2
	TP01MQ1	2	2	2	2	2	2	2

MINISTERIAL STATEMENTS 805, 806 & 968  
ANNUAL COMPLIANCE ASSESSMENT REPORT 2025

Project	Quadrat	Sep-18	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23	Sep-24
	CQ3 (analogue)	2	2	2	2	2	2	2
	CQ5 (analogue)	2	2	2	2	2	2	2
HIOP	HIN01MQ1	2	2	2	2	2	3	3
	HIN02MQ2	2	2	2	2	2	2	3
	HIN03MQ1	2	2	2	2	3	3	3
	HIN04 (analogue)	2	2	3	3	3	3	3
KIOP	AERODROME01MQ1	2	2	2	2	3	3	3
	AERODROME01MQ2	2	3	3	3	3	3	3
	KRE02MQ3	3	2	2	3	3	3	2
	KRE02MQ4	3	2	2	3	3	3	3
	KRE02MQ5	2	2	2	2	2	3	2
	KRE03MQ1	2	2	2	2	3	3	3
	KRE03MQ2	3	2	3	3	3	3	3
	KRE03MQ3	3	3	3	3	3	3	3
	KRE04MQ1	2	2	2	2	2	3	2
	KRE04MQ2	2	2	2	2	2	3	2
	KRE04MQ3	2	2	2	2	2	2	2
	KRE05MQ1	-	2	2	2	3	3	3
	KRE05MQ2	-	2	2	2	3	3	3
	KRE05MQ3	-	2	2	2	3	3	3
	LINEAR01MQ1	2	3	3	3	3	3	3
	TAILINGS01MQ2	2	2	2	2	2	2	2
	RAILVHM	2	3	3	3	3	4	4
	CQ1 (analogue)	2	2	2	2	2	2	2
	CQ4 (analogue)	2	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 rehabilitation performance monitoring, in accordance with the Environmental Procedure - Rehabilitation Performance Monitoring (CORP-EN-PRO-1040). KML ensures implementation of all environmental management measures through regular environmental inspections and audits.

KML maintains a Rehabilitation Schedule to comply with MS 805 (Condition 12-1-2) and MS 806 (Condition 11-1-2), which require *“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 2025 and submitted to the DWER-EPAS for endorsement. A formal endorsement is yet to be received.

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 12-1 of MS 805, Condition 11-1 of MS 806 and the KML's 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 (not including weed species) (KML define species composition as the diversity of the rehabilitated site ( $H_{\text{rehab}}$ ) relative to the corresponding analogue site ( $H_{\text{control}}$ )).
- 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.

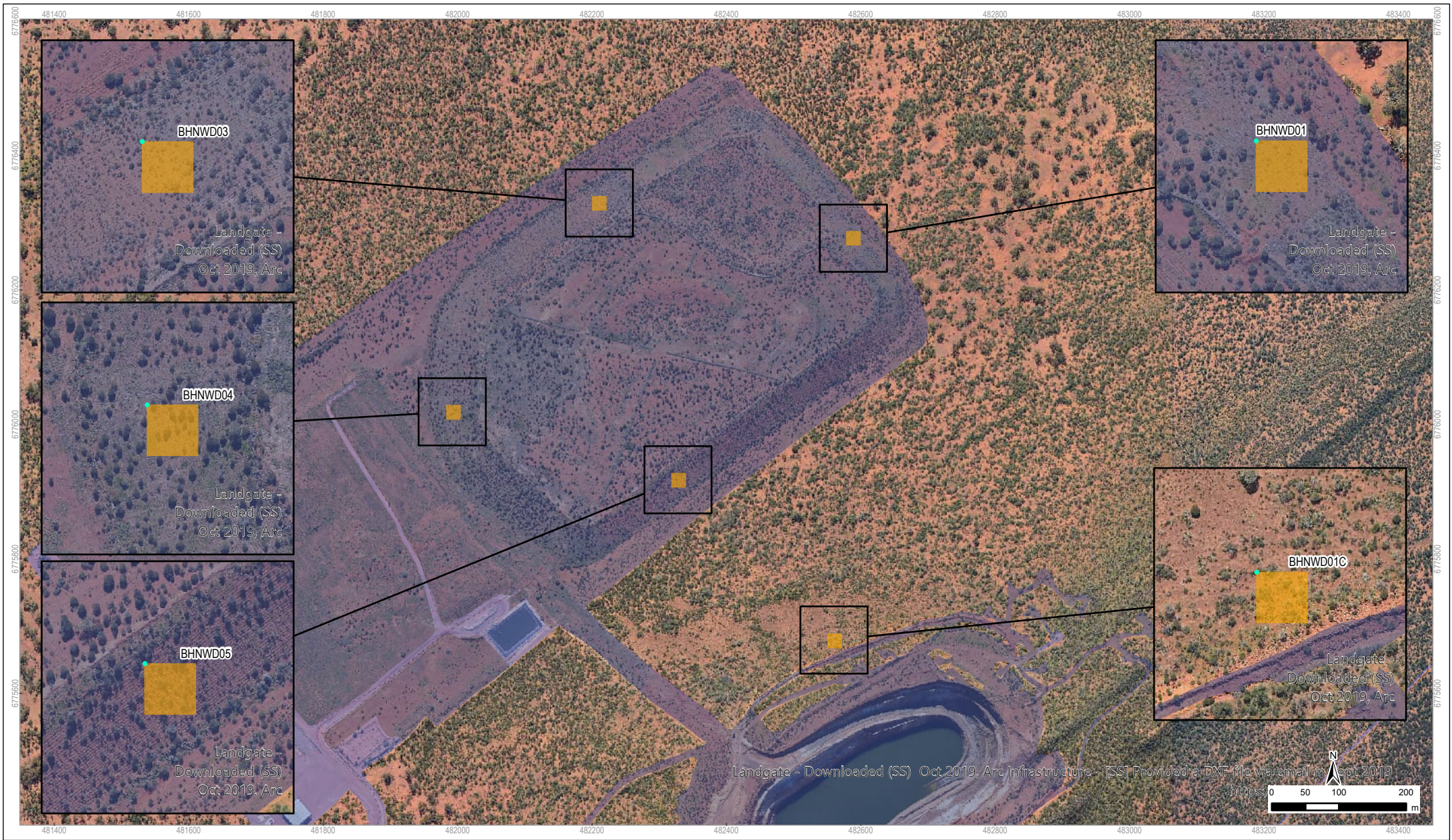
During reporting period, KML monitored 36 rehabilitation monitoring quadrats (20 m by 20 m or 40 m by 10 m), comprising of 27 quadrats within rehabilitated sites and 9 control quadrats in surrounding natural vegetation. Monitoring quadrats have been established within the



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 (2025)

### Rehabilitation Health Monitoring Quadrats at BHN

**KARARA**  
MINING LTD



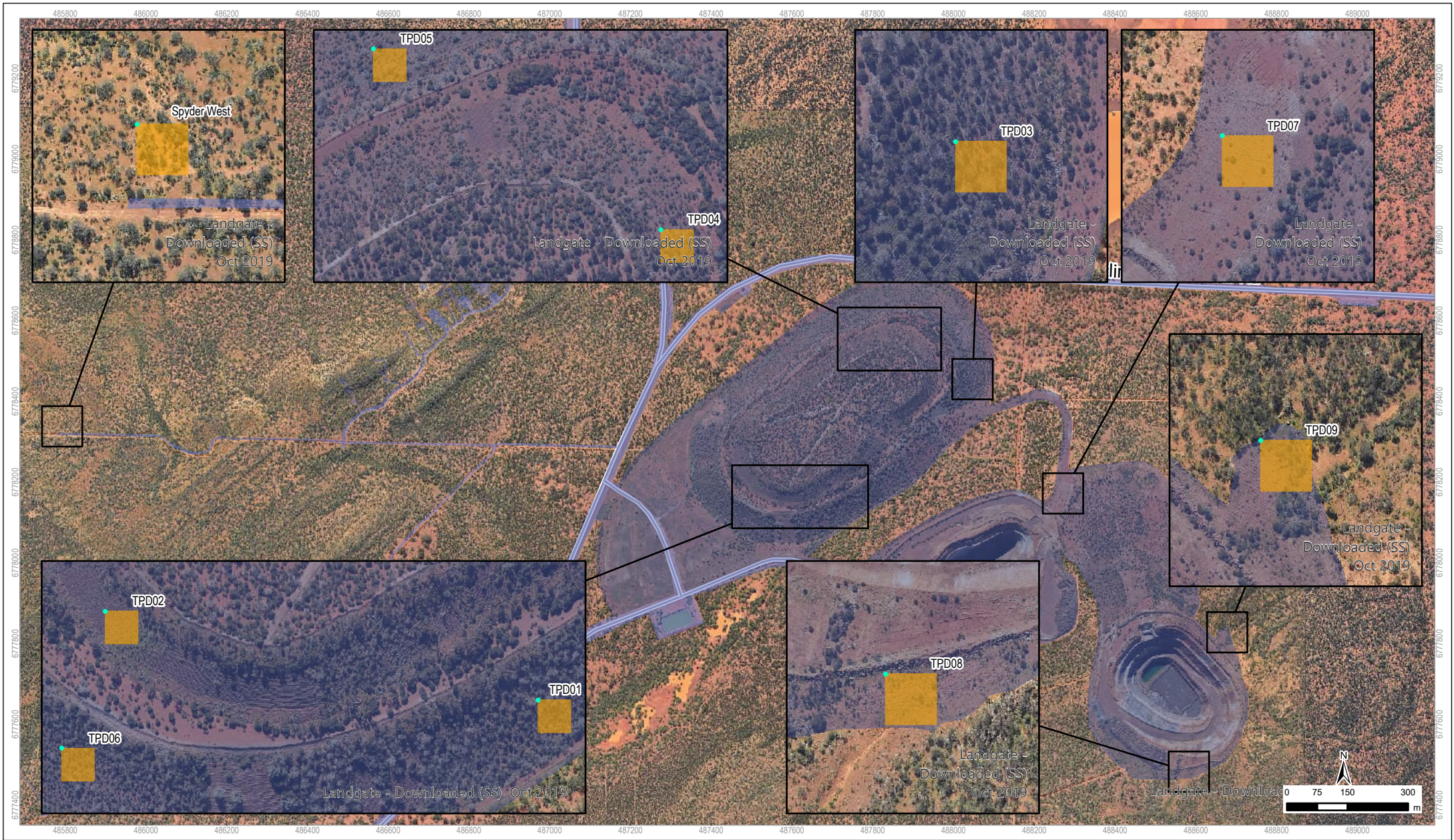
Ref: K0193 F14  
Version: A  
28 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:7,500  
Size: A4



***Figure 20: Rehabilitation Monitoring Quadrats at the Terapod Waste Rock Dump***





MS Annual Compliance Report  
(2025)

Rehabilitation Health  
Monitoring Quadrats at  
Terapod



- |  |   |  |
|--|---|--|
| <span style="color: green;">●</span> Rehabilitation Monitoring Photo   | <span style="color: black;">---</span> Roads Regional | <span style="color: brown;">---</span> Track   |
| <span style="background-color: orange; width: 20px; height: 10px; display: inline-block;"></span> Rehabilitation Monitoring Quadrats | <span style="color: black;">—</span> Main             | <span style="background-color: lightblue; width: 20px; height: 10px; display: inline-block;"></span> KML Open Ground Disturbance |
| <span style="color: purple;">—</span> Railway (Freight)  | <span style="color: gray;">—</span> Minor             | <span style="background-color: darkblue; width: 20px; height: 10px; display: inline-block;"></span> KML Rehabilitation           |
|  | <span style="color: red;">—</span> Highway            |  |



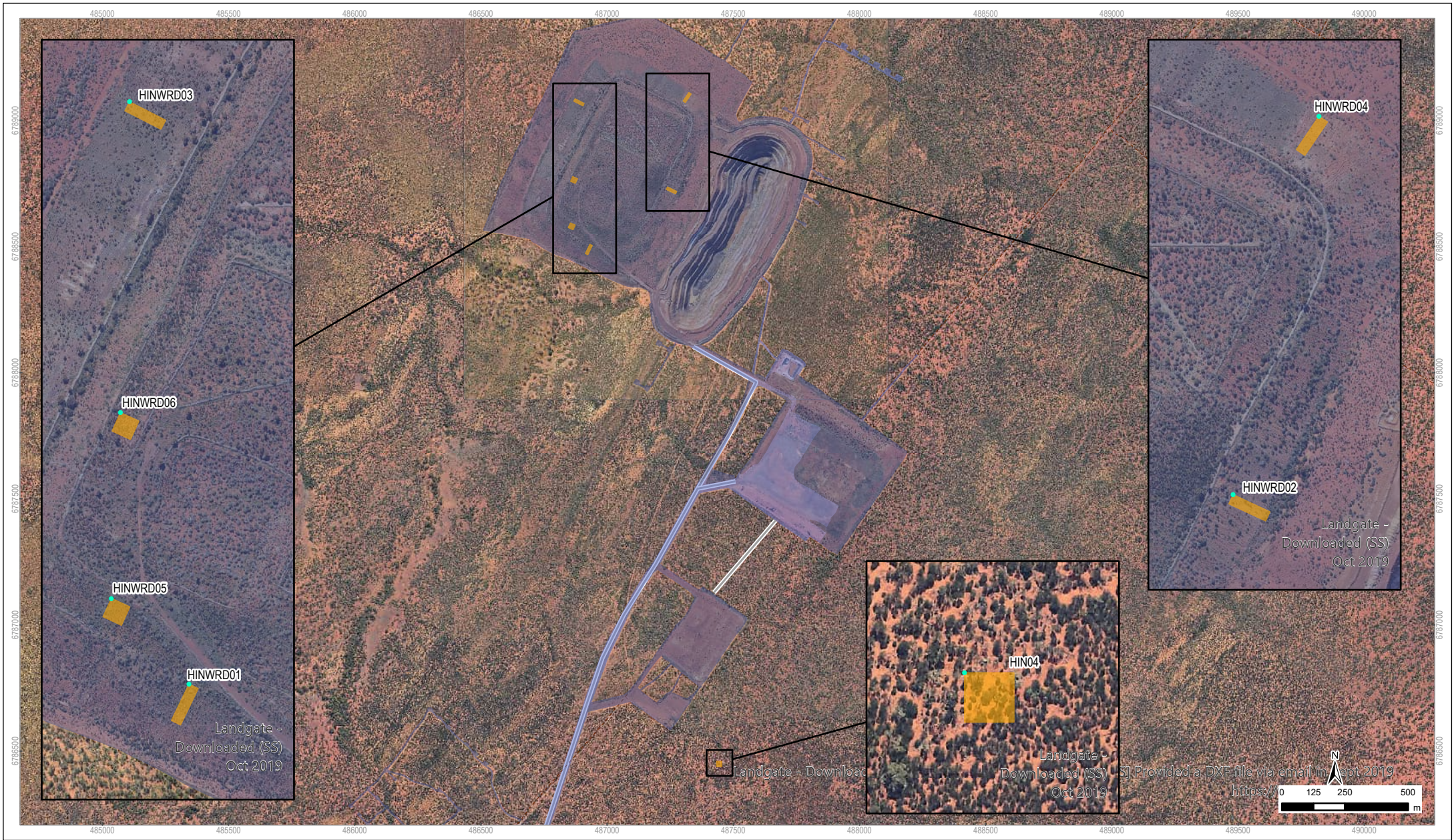
Ref: K0193 F15  
Version: A  
28 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:12,500  
Size: A4



***Figure 21: Rehabilitation Monitoring Quadrats at the Hinge Waste Rock Dump***





**MS Annual Compliance Report  
(2025)**

**Rehabilitation Health  
Monitoring Quadrats at Hinge**

**KARARA**  
MINING LTD

- |   |   |   |
|---|---|---|
| <span style="color: green;">●</span> Rehabilitation Monitoring Photo  | <span style="color: black;">---</span> Roads Regional | <span style="color: blue;">---</span> Track   |
| <span style="background-color: yellow; border: 1px solid black; display: inline-block; width: 20px; height: 10px;"></span> Rehabilitation Monitoring Quadrats | <span style="color: black;">—</span> Main             | <span style="background-color: lightblue; border: 1px solid black; display: inline-block; width: 20px; height: 10px;"></span> KML Open Ground Disturbance |
| <span style="color: purple;">—</span> Railway (Freight)   | <span style="color: grey;">—</span> Minor             | <span style="background-color: lightblue; border: 1px solid black; display: inline-block; width: 20px; height: 10px;"></span> KML Open Ground Disturbance |
|   | <span style="color: red;">—</span> Highway            | <span style="background-color: lightblue; border: 1px solid black; display: inline-block; width: 20px; height: 10px;"></span> KML Rehabilitation          |



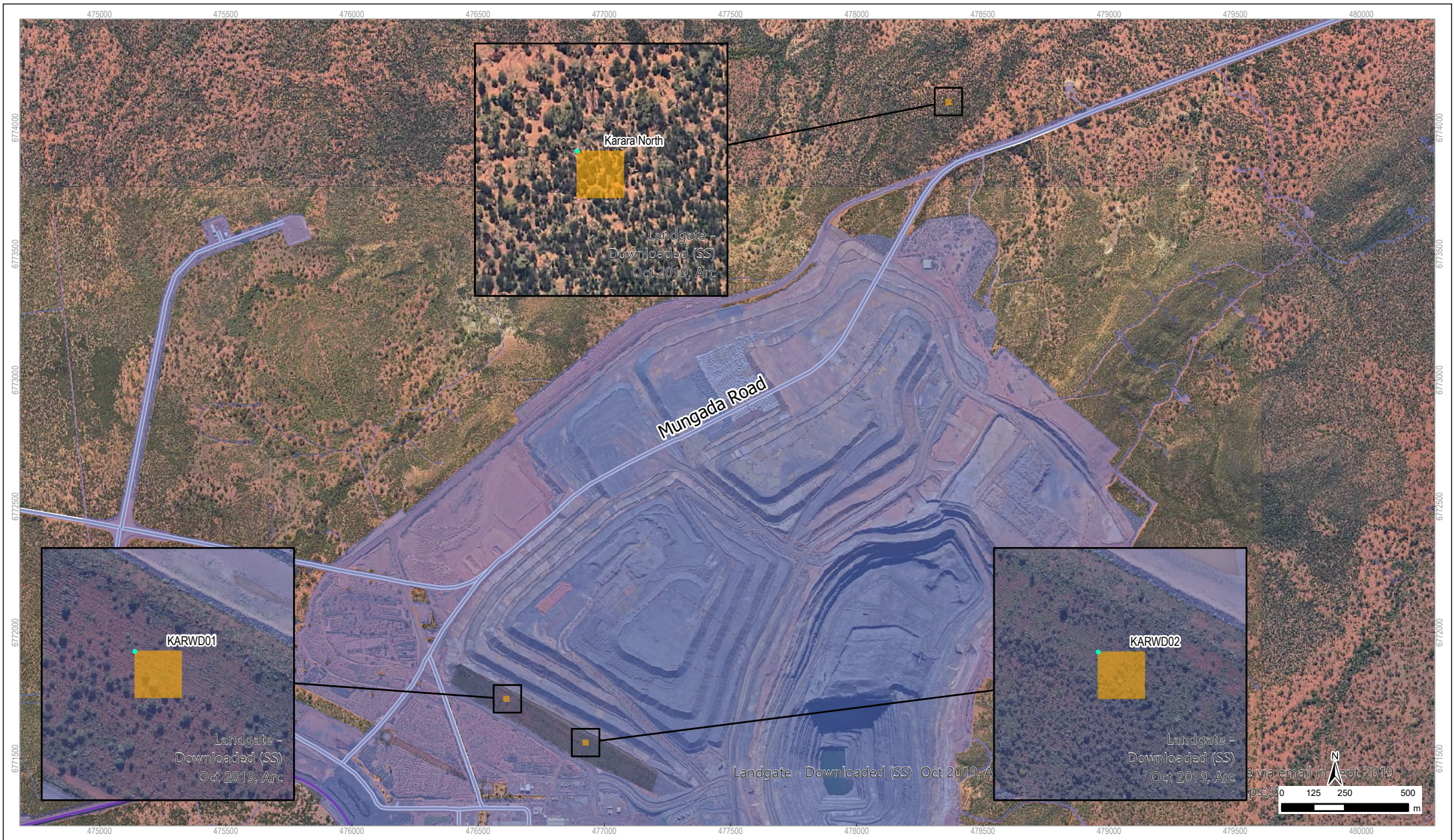
Ref: K0193 F16  
Version: A  
28 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:20,000  
Size: A4



***Figure 22: Rehabilitation Monitoring Quadrats at the Karara Waste Rock Dump***





**MS Annual Compliance Report (2025)**

**Rehabilitation Health Monitoring Quadrats at Karara**



- |   |   |   |
|---|---|---|
| <span style="color: green;">●</span> Rehabilitation Monitoring Photo  | <span style="color: black;">---</span> Roads Regional | <span style="color: brown;">---</span> Track  |
| <span style="background-color: orange; border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></span> Rehabilitation Monitoring Quadrats | <span style="color: black;">—</span> Main             | <span style="background-color: lightblue; border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></span> KML Open Ground Disturbance |
| <span style="color: purple;">—</span> Railway (Freight)   | <span style="color: grey;">—</span> Minor             | <span style="background-color: blue; border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></span> KML Rehabilitation               |
|   | <span style="color: red;">—</span> Highway            |   |



Ref: K0193 F17  
Version: A  
28 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:20,000  
Size: A4



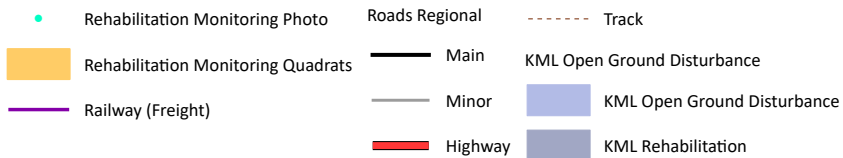
***Figure 23: Rehabilitation Monitoring Quadrats at the Pipeline***



## MS Annual Compliance Report (2025)

### Rehabilitation Health Monitoring Quadrats at Pipeline

**KARARA**  
MINING LTD

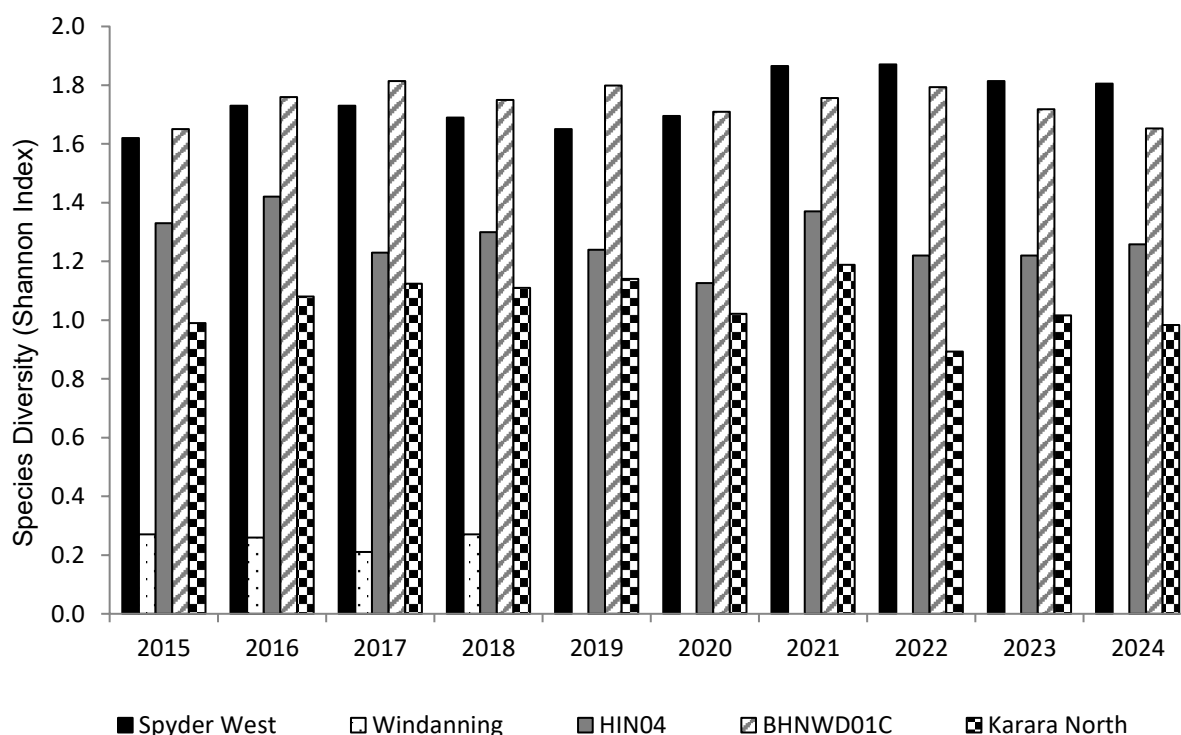


Ref: K0193 F18  
Version: A  
28 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:120,000  
Size: A4

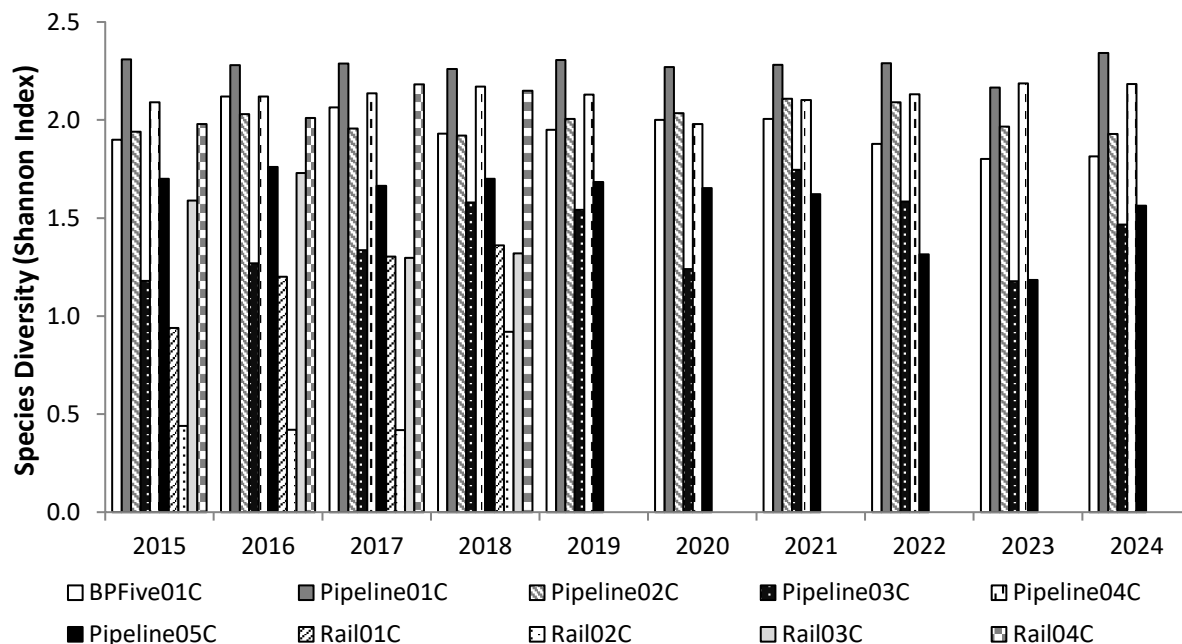
## 6.5.2 Analogue Sites

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. 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 the Analogue Quadrats Surrounding the Waste Rock Dumps**





**Figure 25: Species Diversity (Shannon index) Recorded at the Analogue Quadrats Surrounding the Linear Infrastructure Corridor**

### 6.5.3 Blue Hills North Waste Rock Dump Rehabilitation

A trial rehabilitation slope was established in early 2013 with a single monitoring quadrat (BHNWD01) and an analogue site (BHNWD01C) established in March 2013. The Blue Hills North WRD rehabilitation was 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 2024 rehabilitation monitoring survey identified a maximum of 39 (BHNWD03) to a minimum of 25 (BHNWD01) species from the four sampled rehabilitation quadrats at the Blue Hills North WRD. The Blue Hills North rehabilitation monitoring quadrats have been assessed against the BHNWD01C analogue quadrat, located approximately 0.3 km to the southeast of Blue Hills North WRD where 24 species were identified during the September 2024 survey.

During the reporting period, three of the four Blue Hills North sites exceeded the 70% species composition target, with the only exception being BHNWD04 (39.4%), which historically has been recorded continuously below the target from 2016 to 2020 (Figure 26). The Shannon diversity index recorded at this quadrat has decreased from 1.85 in 2023 to 0.65 in 2024. As the Shannon diversity index measures the species diversity and the evenness in the number of individuals from different species across the quadrat, the significant decrease in the diversity index at BHNWD04 is most likely due to significant increase in abundance of one species of annual herb *Atriplex codonocarpa* that was not recorded in 2023 survey, while 267 individuals

were recorded in 2024. The increased abundance of *A. codonocarpa* is believed to be associated with the high rainfall rate of 422.4 mm recorded in 2024. The diversity index at BHNWD03 has slightly decreased in comparison to last year's value, which is considered as a result of reduced abundance of *Acacia anthochaera* species from 31 individuals in 2023 to 11 individuals in 2024 and increased abundance of *A. codonocarpa* species from 18 individuals in 2023 to 54 individuals in 2024. The diversity index at BHNWD01 and BHNWD05 quadrats have incremented compared to last year's value.

Nine weed species were recorded across all Blue Hill North WRD rehabilitation quadrats (Table 12); however, the weed coverage was rated as being nil (<1%) for all quadrats. These weeds will continue to be managed by KML as part of ongoing weed management practices.

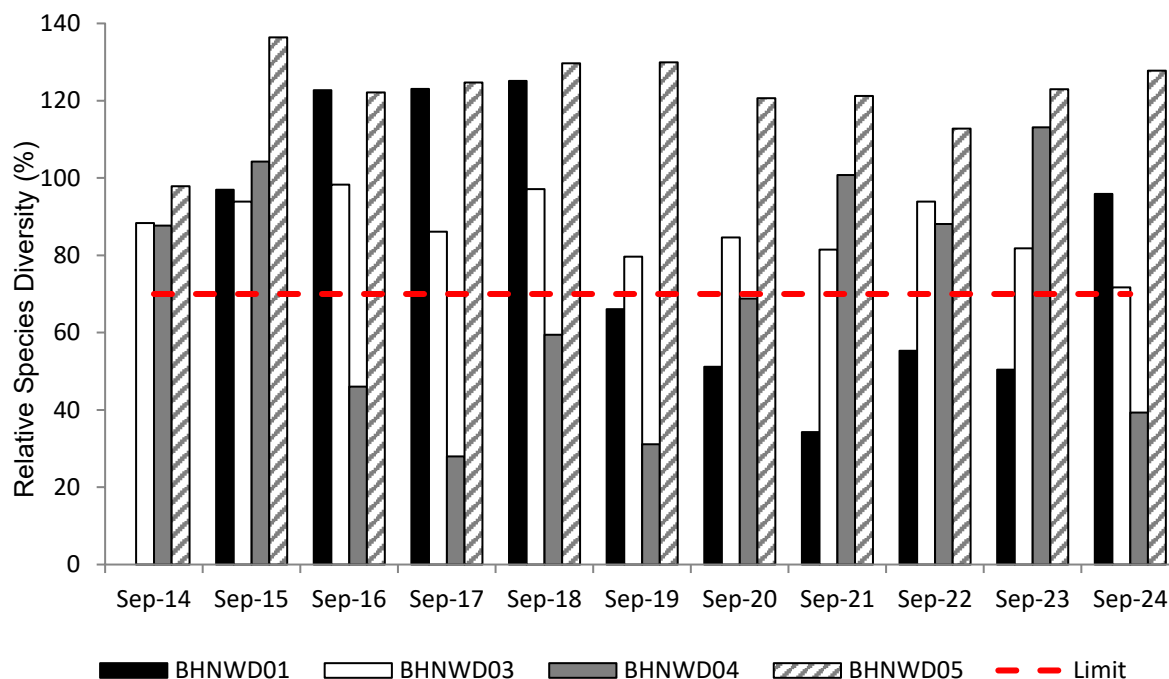
**Table 12: Weed Species Recorded During the September 2024 Survey at Blue Hills North WRD**

Weed Species	BHNWD01	BHNWD03	BHNWD04	BHNWD05
<i>Arctotheca calendula</i>	x	x		
<i>Cuscuta planiflora</i>		x		
<i>Limonium lobatum</i>	x			
<i>Mesembryanthemum nodiflorum</i>	x	x	x	
<i>Pentameris airoides</i>		x		
<i>Raphanus raphanistrum</i>		x	x	
<i>Rumex vesicarius</i>	x	x		
<i>Spergula pentandra</i>	x		x	x
<i>Taraxacum khatoonae</i>			x	



**Plate 1: Blue Hills North WRD Monitoring Site 3 - September 2024 (Left) and September 2018 (Right)**





**Figure 26: Species Diversity Recorded at the Blue Hills North WRD Rehabilitation Monitoring Quadrats (BHNWD01, 3-5), Relative to the Analogue Quadrat (BHNWD01C)**

## 6.5.4 Terapod Waste Rock Dump Rehabilitation

Rehabilitation of the Terapod WRD was 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 rehabilitation quadrats have been assessed against the Spyder West analogue quadrat, located approximately 1.5 km to the west of the 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 the Terapod WRD met the species diversity target of 70% (Figure 27). From the nine sampled quadrats at the Terapod WRD, 47 perennial native plant species were identified. A total of eleven perennial species native to the region were identified at the analogue site (Spyder West), and four of these were identified at TPD08 and TPD09.

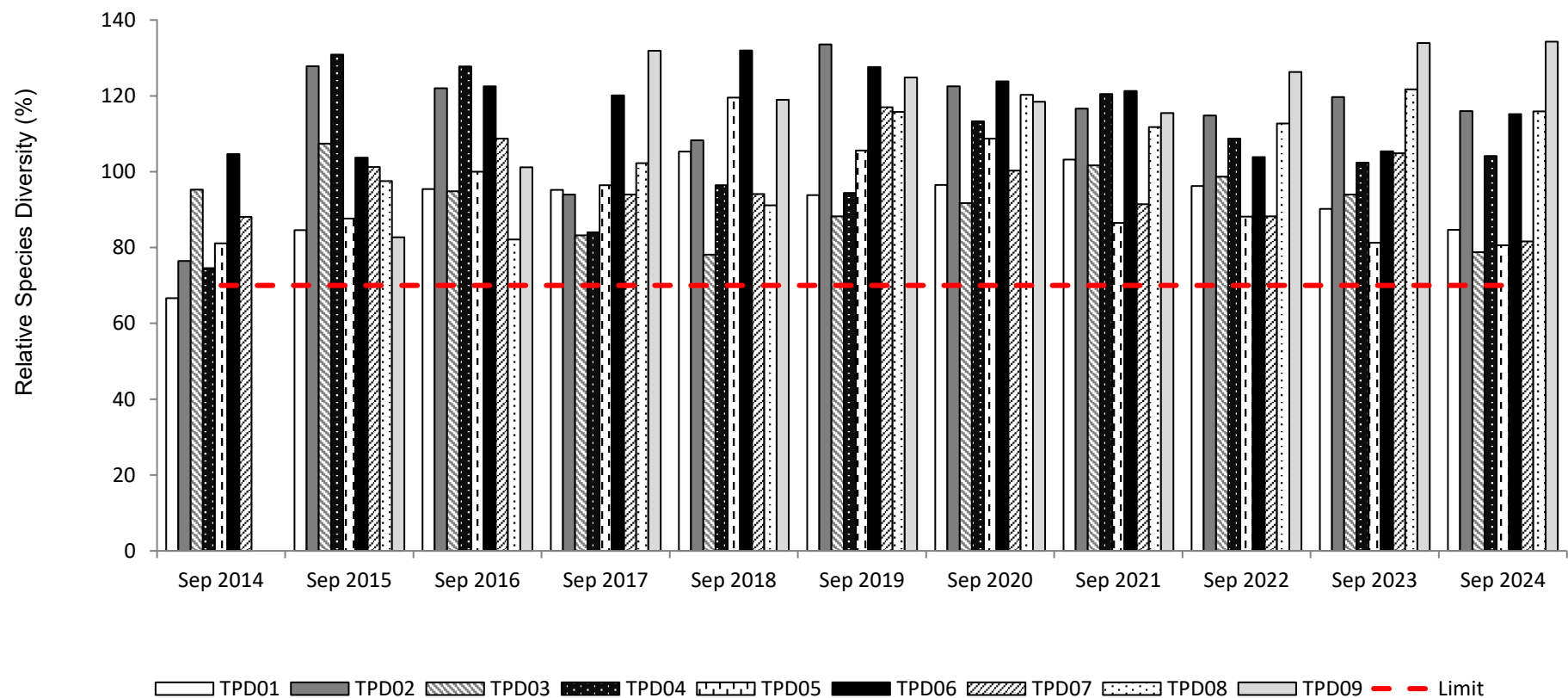


**Plate 2: Terapod WRD Monitoring Site 4 - September 2024 (Left) and September 2018 (Right)**

Six weed species were recorded at the Terapod WRD rehabilitation quadrats during the September 2024 survey, with the most dominant species being *Spergula pentandra* (Table 13). No weed species were recorded at TPD07 and TPD09. Weed coverage at the Terapod WRD was rated as nil (<1%) at all rehabilitation quadrats. These weeds will continue to be monitored and managed.

**Table 13: Weed Species Recorded During the September 2024 Survey at Terapod WRD**

Weed Species	TPD						
	01	02	03	04	05	06	08
<i>Cuscuta epithymum</i>					X		
<i>Cuscuta planiflora</i>							X
<i>Spergula pentandra</i>	X		X	X	X	X	
<i>Taraxacum khatoonae</i>	X						
<i>Mesembryanthemum nodiflorum</i>		X					
<i>Rumex vesicarius</i>			X				



**Figure 27: Species Diversity Recorded at the Terapod WRD Rehabilitation Monitoring Quadrats (TPD01-09), Relative to the Analogue Quadrat (Spyder West)**

### 6.5.5 Hinge Waste Rock Dump Rehabilitation

Rehabilitation works on 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 (HINWRD01-06) and one analogue site (HIN04), which are located approximately 2 km south of the 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 2024 (Left) and September 2018 (Right)**

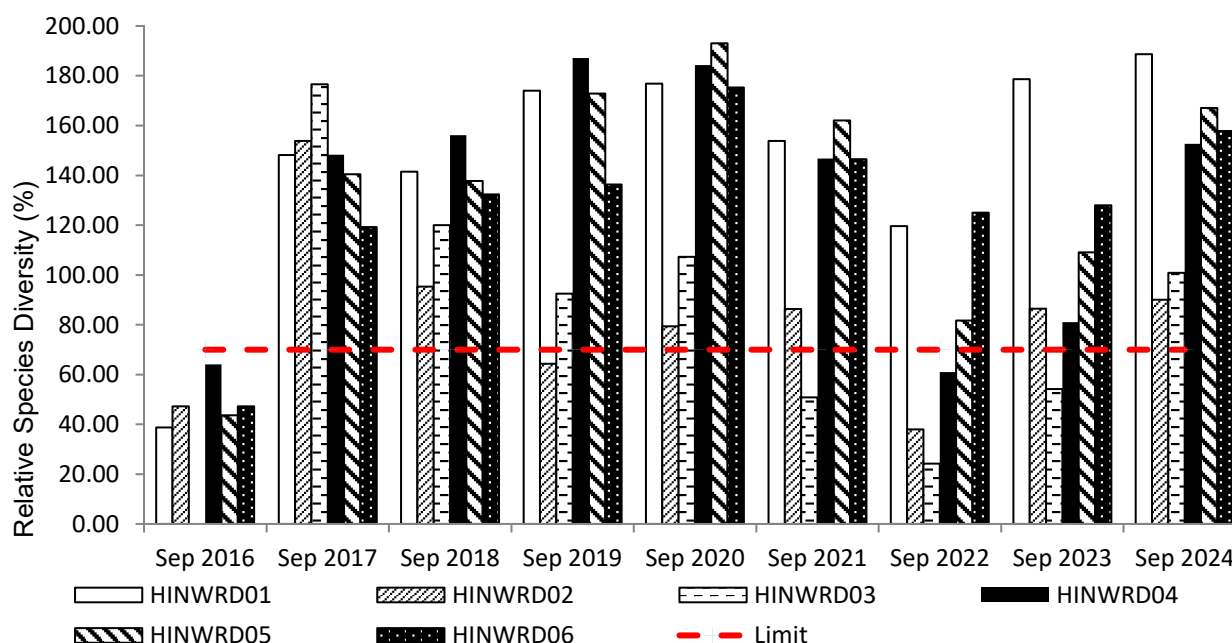
Rehabilitation at Hinge WRD is tracking well, with species diversity exceeding 70% target at all monitoring quadrats during the September 2024 survey (Figure 28). Furthermore, the diversity index has incremented at all six rehabilitation monitoring quadrats compared to previous results.

During the reporting period, 39 perennial plants were identified at the six sampled quadrats at the Hinge WRD. Five perennial species were identified at the analogue site (HIN04), two of which were also recorded at the Hinge WRD rehabilitation quadrats.

Weed coverage at rehabilitation monitoring quadrats varies from high (30-60%) at HINWRD01, HINWRD03 and HINWRD05; moderate (15-30%) at HINWRD02; and low (2-15%) at HINWRD04 and HINWRD06. Significant increase in weed coverage observed at HINWRD03 increasing from nil (<1%) in 2023 to high (30-60%) in 2024. Six weed species were identified across HINWRD monitoring quadrats with the most abundant *Spergula pentandra* (Table 14). Weed management has been ongoing at these areas and will continue while the perennial vegetation continues to establish.

**Table 14: Weed Species Recorded During the September 2024 Survey at the Hinge WRD**

Weed Species	HINWRD					
	01	02	03	04	05	06
<i>Mesembryanthemum nodiflorum</i>	X	X	X	X	X	
<i>Phalaris minor</i>		X			X	
<i>Rumex vesicarius</i>	X		X			
<i>Spergula pentandra</i>	X	X	X	X	X	X
<i>Taraxacum khatoonae</i>	X	X		X	X	
<i>Raphanus raphanistrum</i>				X		

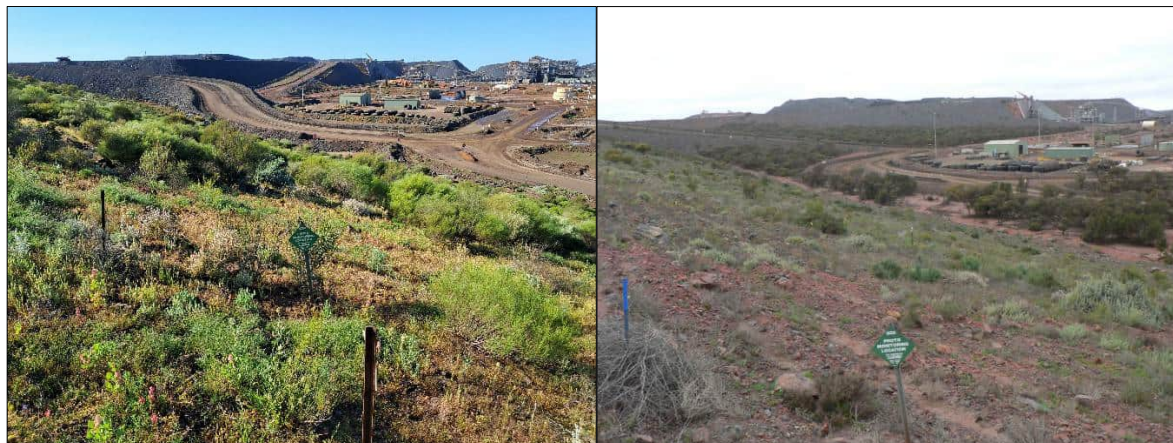


**Figure 28: Species Diversity Recorded at the Hinge WRD Rehabilitation Monitoring Quadrats (HIN01-06), Relative to the Analogue (HIN04)**

## 6.5.6 Karara Waste Rock Dump Rehabilitation

Available sections of Karara WRD have been progressively rehabilitated in 2013, 2015, and 2017. The first monitoring quadrat (KARWD01) was established in August 2013, and the second quadrat (KARWD02) was established in August 2015 (Plate 4). The 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 2024 (Left); September 2018 (Right)**

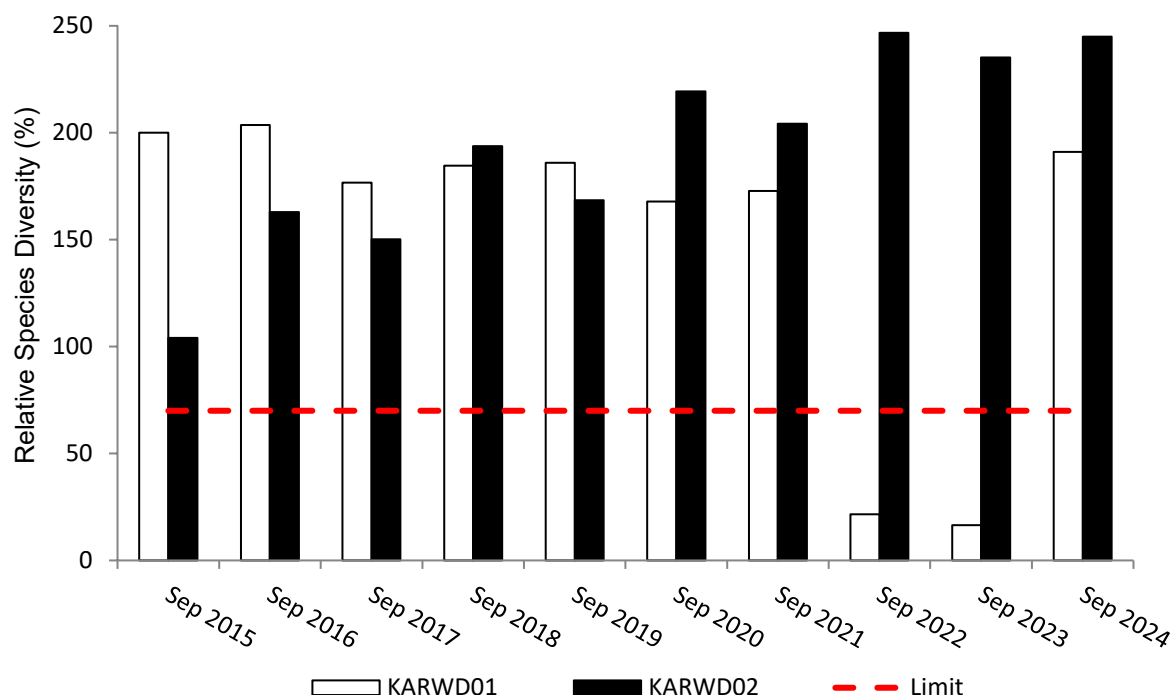
During the reporting period, the species diversity recorded at both Karara WRD rehabilitation monitoring quadrats exceeded the target of 70% (Figure 29). The September 2024 survey identified 21 perennial species native to the surrounding area. One of the five perennial species identified at the analogue site (Karara North) was also identified at KARWD02.

Weed coverage has increased at both rehabilitation monitoring quadrats since last monitoring period. It has increased from low (2-15%) to moderate (15-30%) at KARWD01 and from nil (<1%) to low (2-15%) at KARWD02. Nine weed species were recorded across the two quadrats (Table 15). These weeds will continue to be monitored and managed.

**Table 15: Weed Species Recorded During the September 2024 Survey at the Karara WRD**

Weed Species	KARWD01	KARWD02
<i>Arctotheca calendula</i>	X	
<i>Bromus rubens</i>	X	
<i>Lamarckia aurea</i>		X
<i>Mesembryanthemum nodiflorum</i>	X	X
<i>Pentameris airoides</i>	X	X
<i>Phalaris minor</i>		X
<i>Rumex vesicarius</i>	X	X
<i>Spergula pentandra</i>	X	X
<i>Taraxacum khatoonae</i>	X	X





**Figure 29: Species Diversity Recorded at the Karara WRD Rehabilitation Monitoring Quadrats (KARWD01-02), 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 (Power01-03) commencing in March 2013. All power line monitoring quadrats (Power01-03) and associated analogue quadrats (Power01C-03C) were removed in 2016. Monitoring has been undertaken at pipeline and rail sites annually since September 2016. Four rail monitoring quadrats (Rail01-04) and associated analogue quadrats (Rail01C-04C) in the vicinity of the rail loop was removed in 2019 following approval of the KML's Environmental Management Plan by DWER. Five pipeline quadrats (Pipeline01-05) were monitored during the reporting period. Each of the five pipeline quadrats has an associated analogue quadrat (Pipeline01C-05C) established in adjacent undisturbed vegetation (Figure 30).

The September 2024 survey identified 45 perennial native species over the five pipeline rehabilitation monitoring quadrats and 47 on the five analogue quadrats, with 29 of which were also identified within the rehabilitation quadrats.

Most pipeline rehabilitation quadrats meet the 70% species diversity target, except the quadrat Pipeline03 (Figure 30). The relative species diversity index at Pipeline03 decreased from 69.1% in 2023 to 30.5% in 2024. Similar to BHNWD04, this was largely caused by the

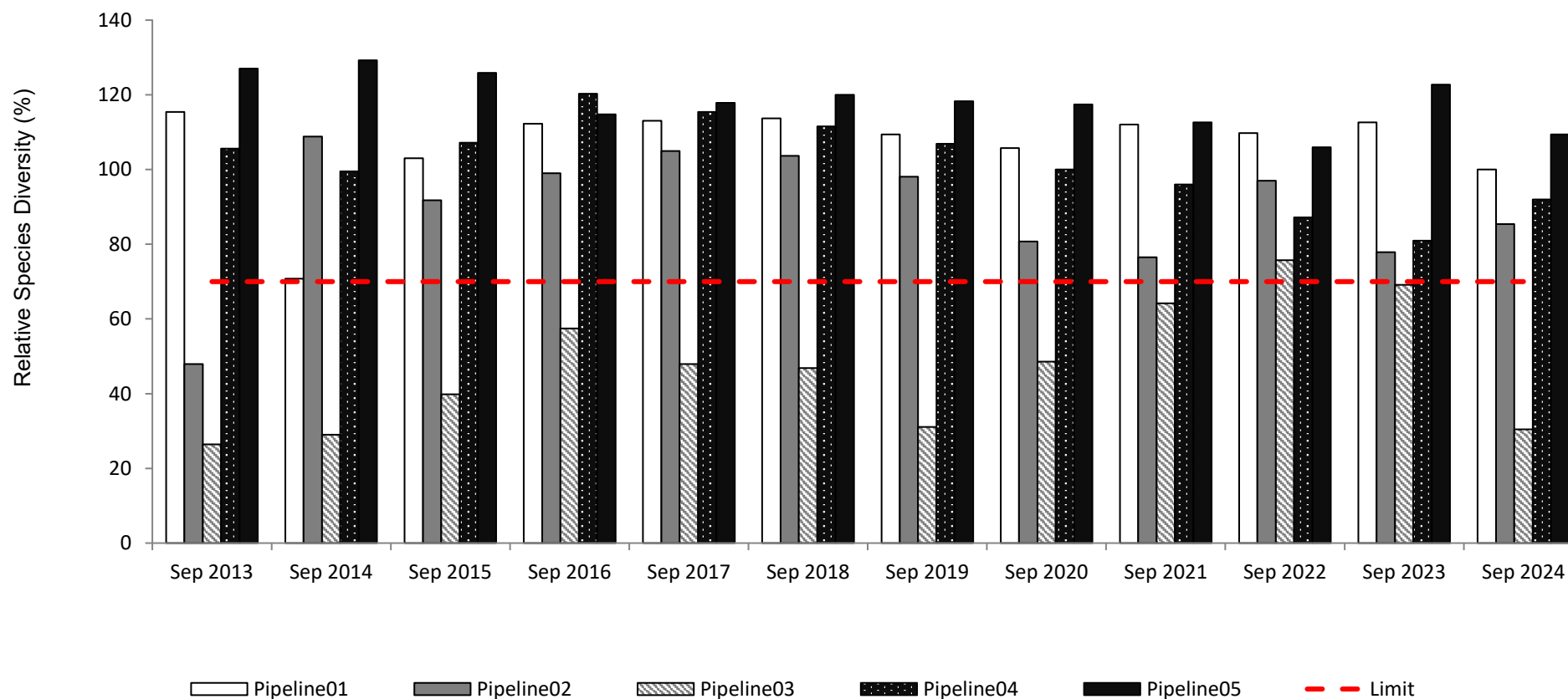
increased abundance of one species (*Atriplex codonocarpa*), with 355 individuals recorded in 2024 compared to 29 individuals recorded in 2023.

In the 2024 monitoring period, weed coverage recorded at all monitoring sites was less than 1%. Ten weed species were identified at three quadrats with majority recorded at Pipeline03 (Table 16). These weeds will continue to be managed as a part of ongoing weed management practices. No weed species were recorded at the quadrats Pipeline04 and Pipeline05.

**Table 16: Weed Species Recorded During the September 2024 Survey at the Linear Infrastructure Corridor**

Weed Species	Pipeline01	Pipeline02	Pipeline03
<i>Avena fatua</i>			X
<i>Cuscuta epithymum</i>	X	X	
<i>Lamarckia aurea</i>			X
<i>Limonium lobatum</i>			X
<i>Mesembryanthemum nodiflorum</i>			X
<i>Monoculus monstrosus</i>			X
<i>Pentameris airoides</i>			X
<i>Phalaris minor</i>			X
<i>Rumex vesicarius</i>	X	X	
<i>Taraxacum khatoonae</i>			X

MINISTERIAL STATEMENTS 805, 806 & 968  
ANNUAL COMPLIANCE ASSESSMENT REPORT 2025



**Figure 30: Species Diversity Recorded at the Pipeline Rehabilitation Quadrats (Pipeline 01-05), Relative to the Associated Analogues (Pipeline01C-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 zones<sup>1</sup> have been established within the permitted seed collection area (Figure 31).

During the reporting period, a total of 7.92 kg of seeds were collected, with details provided in Table 17. 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 quantities and species availability for rehabilitation programs.

**Table 17: Native Flora Seeds Collected**

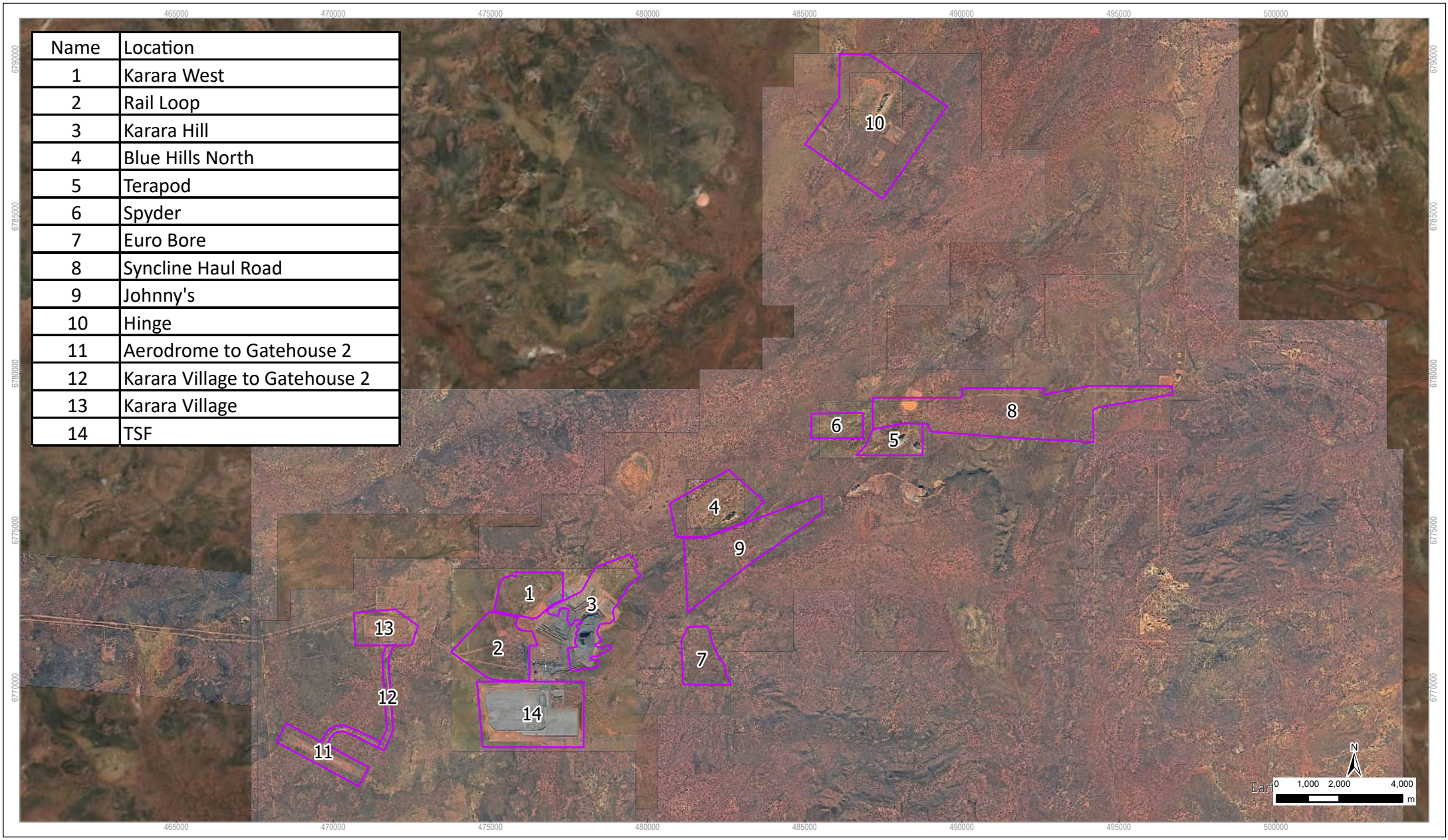
Species Name	Seed Collection Zone	Weight, g
<i>Acacia effusifolia</i>	Zone 10 & Zone 13	370.3
<i>Acacia karinae</i> (P3)	Zone 4	225.6
<i>Acacia murrayana</i>	Zone 9 & Zone 5	5,234.7
<i>Acacia anthochaera</i>	Zone 5	306.7
<i>Acacia ramulosa</i> var. <i>ramulosa</i>	Zone 3	300
<i>Acacia sibina</i>	Zone 13	180
<i>Androcalva luteiflora</i>	Zone 2	175.33
<i>Austrostipa elegantissima</i>	Zone 3	80
<i>Grevillea obliquistigma</i> subsp. <i>obliquistigma</i>	Zone 4	39
<i>Rhodanthe chlorocephala</i> subsp. <i>rosea</i>	Zone 2, Zone 5 & Zone 11	320
<i>Senna artemisioides</i> subsp. <i>x artemisioides</i>	Zone 2	684.8

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


<sup>1</sup> 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

 Native Seed Collection Area



MS Annual Compliance Report  
(2025)

Seed Collection Zones



Ref: K0193 F19  
Version: A  
28 July 2025

Proj: GDA94 MGAZ50  
Scale: 1:160,000  
Size: A4



## 7 CONCLUSION

KML has maintained a high level of compliance with MS 805, MS 806 and MS 968 during the reporting period. Five minor non-compliances were reported associated with monitoring of Shield-backed Trapdoor Spiders (*I. nigrum*) at KIOP (MS 805). The spider monitoring discontinued after re-classification of the species, but without formal confirmation of removal of Condition 9 of MS 805: 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 s.46 of the EP Act has been mostly placed on hold and DWER-EPAS expects staging of progression on the s.46 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 MS 805: 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 MS 806 in 2021. The KIOP MLE Proposal, which incorporates the entire footprint previously approved under MIOP (MS 806) (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 under a new Ministerial Statement 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 the rehabilitation of disturbed areas is still progressing in a positive trajectory and is on track to meet closure objectives. During the reporting period, the 70% species composition target was not met at two rehabilitation monitoring quadrats (BHNWRD04 and Pipeline03). This was primarily due to the over-abundance of one species (*Atriplex codonocarpa*) at both sites, which significantly reduced

species evenness and caused a drop in the Shannon diversity index. *A. codonocarpa* is a native coloniser that has flourished in areas where shrub cover is predominantly sparse. It is a beneficial perennials species with a medium lifespan and plays a key role in suppressing weed growth. The overabundance of *A. codonocarpa* is believed to have resulted from high rainfall in 2024 (422.35 mm), which was the highest recorded in the past decade.

## 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 Malleefowl Monitoring Manual*. Retrieved from <https://library.dbca.wa.gov.au/FullTextFiles/631333.pdf>

## **APPENDIX A: KML ENVIRONMENT POLICY**



## 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 Junpeng Gai**  
Chief Executive Officer

**January 2025**

## **APPENDIX B: MS805 STATEMENTS OF COMPLIANCE AND AUDIT TABLE**



## Statement of Compliance

### 1. Proposal and Proponent Details

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

### 2. Statement of Compliance Details


Reporting Period	<i>1/07/24 to 30/06/25</i>
------------------	----------------------------

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"/>

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

INITIALS: 

### 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 4.5 MS805 Condition 9.1 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 2024/2025 audit that the above conditions have 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 type="checkbox"/> No X

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"> <li>Condition 9.1 requires implementation of Shiled-backed Trapdoor Spider Management and Monitoring prior to ground disturbing activity.</li> <li>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>.</li> <li>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.</li> <li>Condition 9.4 requires the results of the monitoring program to be submitted to the DWER.</li> <li>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.</li> </ul> <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</p>

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

INITIALS: 

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-conditions 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-conditions 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, which is non-compliance with Condition 4.5. However, DWER previously advised that KML can discontinue spider monitoring and KML are considered to meet the intention of the MS805 Conditions 9.1, 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, 2023 and 2024. 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 9.1, 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-conditions 9.1 – 9.5) in relation to the spider monitoring program was also included in the referral application for the Proposal submitted to 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-conditions 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 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-conditions 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 assessment of the Proposal. It is understood that a new Ministerial Statement for the Proposal will replace the MS805 when the Proposal is approved and this ongoing minor non-compliance would be resolved.

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:.....15/08/2025.....

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](mailto:compliance@dwer.wa.gov.au)

#### 7. Post Assessment Guidelines and Forms

Post assessment documents can be found at [www.epa.wa.gov.au](http://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*

**ATTACHMENT 1****Table 1 Compliance Status Terms**

<b>Compliance Status Terms</b>	<b>Abbrev</b>	<b>Definition</b>	<b>Notes</b>
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"> <li>ongoing requirements that have been met during the reporting period; and</li> <li>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'.</li> </ul>
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"> <li>audit elements have a finite period of application (e.g. construction activities, development of a document);</li> <li>the action has been satisfactorily completed; and</li> <li>the DWER has provided written acceptance of 'completed' status for the audit element.</li> </ul>
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><b>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</b></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:   *JS*



# 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	<b>Proposal Implementation</b>	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.	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"> <li>The following changes of mine activities in the KIOP Mining Proposal (Rev 6, Reg ID124340) for the Wet Concentrate Storage Facility extension have been approved by DEMIRS on 8 August 2024: <ul style="list-style-type: none"> <li>A change of miscellaneous activity of 0.91ha 'transport and infrastructure corridor' to key mine activity 'plant site'</li> <li>A change of miscellaneous activity of 1.95ha 'diversion channel or drain' to key mine activity 'plant site'</li> </ul> </li> <li>Expansion of the waste rock dump (within approved MS 805 disturbance footprint) continued with additional clearing of 11.5 ha completed during the reporting period.</li> <li>Disturbance footprint within the approved footprint (GIS check)</li> <li>Total Area of disturbance of mine and linear infrastructure corridor to date (1,514ha) (121ha rehabilitated)</li> <li>Production rate for the current reporting year (8,108,634 dry tonnes concentrate).</li> <li>Pit dimensions (h, w, depth) within approved description</li> <li>Waste rock production for the current reporting period is 18,688,028 tonnes.</li> <li>Footprint of WRD is 249.6 ha.</li> <li>PAF material of 743,989 tonnes mined during reporting period and all contained within isolation cell in WRD.</li> <li>Dewatering rates less than licensed amount (192,143 t/y of licenced amount of 573,600 t/y)</li> </ul>				
805:M2.1	<b>Proponent Nomination and Contact Details</b>	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 805.M3.1	CAP req.	Commencement of project works by the proponent.	Overall	Approval void 9 September 2014 if project not substantially commenced	CLD	
				Evidence	<ul style="list-style-type: none"> <li>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.</li> </ul>				
805:M2.2	<b>Proponent Nomination and Contact Details</b>	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.	Overall	Within 30 days of such change	C	
				Evidence	<ul style="list-style-type: none"> <li>The Proponent details are consistent with the company details on the KML website (<a href="#">Karara Mining</a>).</li> <li>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.</li> </ul>				
805:M3.1	<b>Time Limit of Authorisation</b>	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.	Overall	Approval void 9 September 2014 if project not substantially commenced	CLD	
				Evidence	Audited as compliant in previous audit period, no further action required				



# AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
805:M3.2	<b>Time Limit of Authorisation</b>	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.	Overall	Provide letter to DWER on or before 9 September 2014	CLD	
				Evidence	Audited as compliant in previous audit period (Copy of audit report in 2020 ACAR), no further action required.				
805:M4.1	<b>Compliance Reporting</b>	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"> <li>The preparation of a CAP</li> <li>Advice from OEPA advising that the CAP is satisfactory</li> </ul>	Overall	As required	C	
				Evidence	<ul style="list-style-type: none"> <li>The latest CAP included in 2020 ACAR (dated 25/08/2020) sighted.</li> <li>Revised CAP submitted to the 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.</li> </ul>				
805:M4.2	<b>Compliance Reporting</b>	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.	Design	Prior to implementation of the proposal and as required thereafter	CLD	
				Evidence	<ul style="list-style-type: none"> <li>The initial CAP, as required by condition 4-1, was submitted to the CEO in September 2009, prior to implementation of the proposal.</li> <li>The latest CAP included in 2020 ACAR (dated 25/08/2020) sighted. Letter received from DWER 30/07/2020 advising that revised CAP meets the requirements of Condition 4-1.</li> </ul>				
805:M4.2 (1-6)	<b>Compliance Reporting</b>	The CAP shall indicate the <ol style="list-style-type: none"> <li>Frequency of compliance reporting</li> <li>Approach and timing of compliance assessments</li> <li>Retention of compliance assessments</li> <li>Reporting of potential non-compliances and corrective actions taken</li> <li>Table of contents of compliance Assessment Reports</li> <li>Public availability of the Compliance Assessments Reports</li> </ol>	The CAP shall indicate the <ol style="list-style-type: none"> <li>Frequency of compliance reporting</li> <li>Approach and timing of compliance assessments</li> <li>Retention of compliance assessments</li> <li>Reporting of potential non-compliances and corrective actions taken</li> <li>Table of contents of compliance Assessment Reports</li> <li>Public availability of the Compliance Assessments Reports</li> </ol>	CAP req.	Content within the CAP	Design	Prior to implementation of the proposal and as required thereafter	C	
				Evidence	<ul style="list-style-type: none"> <li>The latest CAP (Revision 8 dated 16/06/2020) states the frequency of compliance reporting and compliance assessment approach – refer to Section 3.</li> <li>Review of ACAR (2024 ACAR) indicates that audits were conducted annually.</li> <li>The latest CAP (Revision 8 dated 16/06/2020) outlines that requirements for the retention of compliance assessments – refer to Section 5.</li> <li>The latest CAP (Revision 8 dated 16/06/2020) outlines the method of reporting potential non-compliances and corrective actions – refer to Section 4 and Appendix 2.</li> <li>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.</li> <li>The latest CAP (Revision 8 dated 16/06/2020) outlines the public availability of the Annual Compliance Assessment Report – refer to Section 7.</li> </ul>				
805:M4.3	<b>Compliance Reporting</b>	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	Overall	7 September annually	C	
				Evidence	2025 ACAR included assessment of compliance (Appendix B: Statements of Compliance)				



# AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
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	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"><li>The 2024 ACAR and previous ACARs are retained in Folder 9.1 on KML's Environment SharePoint site.</li><li>A copy of the 2024 ACAR is retained on KML Document Management System and KML's intranet.</li></ul>				
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"><li>Letter to OEPA advising of non-compliances</li><li>Non-compliance reports and correspondence between OEPA and KML on non-compliance</li></ul>	Overall	As soon as practicable and within seven days of the non-compliance being confirmed by KML	NC	
				Evidence	<ul style="list-style-type: none"><li>Monitoring of Shield-backed Trapdoor Spiders, as required by Condition 9, has been discontinued following 2019 monitoring due to re-classification of the species.</li><li>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 s.46(1) of the EP Act on 18/05/2022.</li><li>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.</li><li>KML submitted surrender documentation to DMIRS (now 'DMPE') in June 2021 and surrender of M59/650 was formally registered with the DMIRS (now 'DMPE') on 17/08/2021.</li><li>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 s.38 of the EP Act on 21/02/2022 and resubmitted the revised referral application to the EPA under s.38C of the EP Act on 30/09/2022, with submission of additional information to the EPA on 22/12/2022. The EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s.38G(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 s.46 of the EP Act has been mostly placed on hold and EPAS expects staging of progression on the s.46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal.</li><li>While the formal assessment of the Proposal continued during the reporting period, DWER-EPAS provided no updates on the progress of removal of Condition 9 of MS805: spider monitoring.</li></ul>				
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	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)	Overall	Submit a Compliance Assessment Report on 7 September annually	C	
				Evidence	2023/24 ACAR submitted to DWER on the 30/08/2024.				
805:M4.6(1-5)	Compliance Reporting	The Compliance Assessment Report shall: 1. Be endorsed by the proponent's Managing Director or a person, approved in writing by the	1. Compilation of associated compliance assessment report that is endorsed by KML's Chief Executive Officer or delegate	CAP req.	<ul style="list-style-type: none"><li>Compilation of associated compliance assessment reports that is endorsed by KML's CEO or delegate.</li><li>Compliance Assessment Report submitted to DWER reports compliance with the Statement conditions.</li></ul>	As above for 805:M4.6	As above for 805:M4.6	C	





# AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS805	Further information
		<p>CEO, delegated to sign on the Managing Director's behalf;</p> <p>2. Include a statement as to whether the proponent has complied with the conditions;</p> <p>3. Identify all non-compliances and describe corrective and preventative actions taken;</p> <p>4. Be made publicly available in accordance with the approved CAP</p> <p>5. Indicate any proposed changes to the CAP required by condition 4-1</p>	<p>2. Compliance Assessment Report submitted to DWER;</p> <p>3. Make reports publicly available in accordance with PAG4 – Post Assessment Guideline for Making Information publicly available (OEPA, 2012c) and</p> <p>4. Completed Compliance Assessment Reports indicating changes to the CAP</p>	<p>• Compliance Assessment Report submitted to DWER reports non-compliances and corrective and preventative actions.</p> <p>• Compliance Assessment Report will be made available to stakeholders, including members of the public, upon request and within 7 days of the proponent receiving the request.</p> <p>• Completed Compliance Assessment Report indicating changes to CAP.</p>				
				<p>Evidence</p> <p>• 2023-24 ACAR was endorsed by the delegate of KML's CEO.</p> <p>• 2023-24 ACAR was submitted to DWER on 30/08/2024.</p>				
805:M5.1 (1-3)	Performance Review and Reporting	<p>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> <p>1. 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</p> <p>2. the level of progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable</p> <p>3. significant improvements gained in environmental management which could be applied to this and other similar projects.</p>	<p>Compilation of associated Performance Review Reports that:</p> <p>1. 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> <p>2. 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> <p>3. identify significant improvements gained in environmental management.</p>	<p>CAP req.</p> <p>• Compilation of associated Performance Review reports.</p> <p>• 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> <p>• 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> <p>• Compilation of associated Performance Review Reports that identify significant improvements gained in environmental management.</p>	Overall	Submit to the DWER 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 DWER may regard as reasonable	CLD	
				<p>Evidence</p> <p>• PRR for 2010 received by OEPA on 12/01/2011 (1<sup>st</sup> Year)</p> <p>• PRR for 2011 received by OEPA on 4/01/2012 (2<sup>nd</sup> Year)</p> <p>• PRR for 2013 submitted 8<sup>th</sup> November 2013 11/11/2013 (4<sup>th</sup> year)</p> <p>• PRR for 2015 sent to OEPA via e-mail on 22/01/2016 (6<sup>th</sup> Year)</p> <p>• PRR for 2017 to be submitted to OEPA by December 2017 (8<sup>th</sup> Year)</p> <p>• PRR for 2019 submitted to OEPA on 08 May 2020 (10<sup>th</sup> year)</p> <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>				
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> <p>• Performance Review Reports made available to stakeholders, including members of the public, upon request and within 7 days of the proponent receiving the request.</p> <p>• PRRs readily available in KML's Document Management System. Data sighted as part of this audit was readily available.</p>	Overall	Within seven days of the proponent receiving the request	C	
				<p>Evidence</p> <p>• PRRs are available on KML document control system – PRRs are sighted in Folder 9.5 on Environment SharePoint site.</p> <p>• During the reporting period, no stakeholders, including members of the public, had requested a copy of the PRR.</p>				



# AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
805:M6.1	<b>Priority Ecological Community</b>	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 (PEC).	Establishment and implementation of the following KML procedures prior to construction: <ul style="list-style-type: none"> <li>Approvals Request and Ground Disturbance Procedure that includes a requirement to delineate the PEC; and</li> <li>Effective incident reporting process.</li> </ul>	CAP req.	<ul style="list-style-type: none"> <li>A Ground Disturbance Process that includes measures to restrict areas of works to the delineated approved areas.</li> <li>Works conducted within the delineated areas and an effective incident reporting process.</li> </ul>	Construction	During ground disturbing activities	C	
				Evidence	<ul style="list-style-type: none"> <li>Priority Ecological Community (PEC) protected through a number of Environmental Management System (EMS) documents, 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.</li> <li>Records of Ground Disturbance Permits (e.g. GD-1283(D)_Rev 8) viewed and found to be compliant with Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004</li> <li>Two breaches associated with Ground Disturbances were reported during the audit period under INX ref (#141922 and #143804), associated with procedural breach and minor driving outside of the approved disturbance footprint respectively.</li> <li>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.</li> </ul>				
805:M6.2	<b>Priority Ecological Community</b>	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.	CAP req.	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.	Operation	Ongoing	C	
				Evidence	<p>KML's EMS contains the following key documents that include relevance to minimum clearing and reducing impacts and/or PEC protection from mining activities:</p> <ul style="list-style-type: none"> <li>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.</li> <li>Environmental Procedure – Approvals Requests and Ground Disturbance (CORP-EN-PRO-1004).</li> <li>Environmental Procedure – Flora, Weeds and Plant Pathogens (CORP-EN-PRO-1009).</li> <li>Environmental Plan – Flora and Vegetation Health Monitoring (CORP-EN-PLN-1012).</li> <li>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 PEC within the Project area.</li> <li>Environmental Procedure – Dust Monitoring (CORP-EN-PRO-1005).</li> <li>Environmental Procedure – Terrestrial Fauna Management (CORP-EN-PRO-1010).</li> <li>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.</li> <li>Storage and Use of Hazardous Substances Standard (CORP-HS-STD-</li> </ul>				



# AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
					<p>1042).</p> <ul style="list-style-type: none"> <li>Environmental Procedure – Feral Animal Management and Monitoring (CORP-EN-PRO-1050).</li> <li>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.</li> <li>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.</li> <li>The 2024 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.</li> </ul>				
805:M6.3	<b>Priority Ecological Community</b>	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.	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.	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"> <li>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.</li> <li>AR/GD Register sighted.</li> <li>Sighted GD Release Form CORP-EN-FRM-1014 (GD-1442) for the Wet Concentrate Storage Facility extension signed by all relevant parties including contractors and KML Environmental Department.</li> <li>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.</li> <li>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.</li> <li>Induction includes education on importance of clearing control, weeds, dust, dust suppression water overspray, feral animals and fire.</li> <li>Monitoring of weeds, fire, feral animals, dust deposition and dust suppression water overspray (as per Flora and Vegetation Health Monitoring Plan (Section 4 – Implementation and Operation) - sighted.</li> <li>Restricted access signage and rehabilitation signage in locations around site.</li> </ul>				
805:M6.4	<b>Priority Ecological Community</b>	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.	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.	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"> <li>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 endure flora and fauna are not affected.</li> <li>KML Environmental Plan – Flora and Vegetation Health Monitoring (CORP-EN-PLN1012) includes measures to assess threats and</li> </ul>				



## AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
					<p>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.</p> <ul style="list-style-type: none"> <li>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.</li> <li>Restricted access signage and rehabilitation signage in locations around site.</li> </ul>				
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 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.	CAP req.	<ul style="list-style-type: none"> <li>Monitoring results associated with the dust, flora and fauna, traffic management and training programs in relation to the PEC in ACAR.</li> <li>Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA.</li> </ul>	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"> <li>Flora and Vegetation Health Monitoring Plan (CORP-EN-PLN-1012) describes monitoring to occur in PEC.</li> <li>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.</li> <li>Monitoring results for flora health, dust, saline water, erosion, feral animals and fire captured in 2024/25 ACAR (Section 6.4 – Flora Management).</li> </ul>				
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.	CAP req.	<ul style="list-style-type: none"> <li>Monitoring results associated with the dust, flora and fauna, traffic management and training programs in relation to the PEC in ACAR.</li> <li>Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA.</li> </ul>	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"> <li>2024/25 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.</li> <li>2024/25 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.</li> <li>Review of the KML Incident Management System INX In-Control and 2024/25 ACAR indicated no incidents of PEC vegetation health decline in relation to the use of saline water for dust suppression.</li> </ul>				
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.	CAP req.	<ul style="list-style-type: none"> <li>Monitoring results associated with the fire, flora and fauna, traffic management access and training programs in relation to the PEC in ACAR.</li> <li>Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA.</li> </ul>	Overall	Ongoing	C	
				Evidence	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.				





# AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
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.	CAP req	<ul style="list-style-type: none"><li>Monitoring results associated with feral animals, Flora and fauna, traffic management and training programs in relation to the PEC in ACAR.</li><li>Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA.</li></ul>	Overall	Ongoing	C	
				Document	<ul style="list-style-type: none"><li>Feral fauna monitoring measures described in Environment Procedure-Feral Animal Management and Monitoring (CORP-EN-PRO-1050).</li><li>Monitoring and trapping results of feral animals are included in the 2024/25 ACAR – refer section 6.2.4.</li></ul>				
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.	CAP req	Establishment and implementation of proposed management measures to the satisfaction of OEPA.	Overall	Immediately, in the event that the outcome of condition 6-1 is not being met or are not likely to be met	C	
				Document	<ul style="list-style-type: none"><li>Review of the KML Incident Management System INX In-Control 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.</li><li>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.</li></ul>				
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"><li>Construction Trench Inspection Logs including measure of trench length open at any one time.</li><li>Completion of ACAR.</li></ul>	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"><li>The requirements of these conditions are captured in the Environmental Procedure – Terrestrial Fauna CORP-EN-PRO-1010 (Section 3.8 – Trenching and Excavations).</li><li>During the reporting period, approximately 20 m of trenching for services installation was conducted at KIOP.</li></ul>				





# AUDIT TABLE

PROPOSAL: Karara Iron Ore Project (KIOP)

STATEMENT: 805

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
805:M8.2	<b>Fauna protection from trenches</b>	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"> <li>Construction Trench Inspection Logs including verification fauna refuges being in place at the required spacing.</li> <li>Copies of contractor specification documents.</li> <li>Completion of ACAR.</li> </ul>	Overall	Ongoing	C	
				Evidence	During the reporting period, approximately 20 m of trenching for services installation was conducted at KIOP.				
805:M8.3	<b>Fauna protection from trenches</b>	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"> <li>Authorisation (Section 40) to Take or Disturb Threatened Species (Fauna) TFA 2021-0056-2 expired in January 2025. An application for a new Authorisation has been submitted to DBCA in July.</li> <li>During the reporting period, approximately 20 m of trenching for services installation was conducted at KIOP.</li> </ul>				
805:M8.4	<b>Fauna protection from trenches</b>	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"> <li>Construction trench Inspection Logs; and</li> <li>Requirements for inspection and removal of fauna by fauna handlers included in contractor specifications.</li> </ul>	CAP req	<ul style="list-style-type: none"> <li>Construction Trench Inspection Logs.</li> <li>Completion of ACAR.</li> </ul>	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 3:00pm and 6:00pm	C	
				Evidence	During the reporting period, approximately 20 m of trenching for services installation was conducted at KIOP.				
805:M8.5	<b>Fauna protection from trenches</b>	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"> <li>Construction trench inspection logs, and</li> <li>Requirements in the event of significant rainfall included in contractor specifications.</li> </ul>	CAP req	<ul style="list-style-type: none"> <li>Construction Trench Inspection Logs.</li> <li>Copies of contractor specification documents.</li> <li>Completion of ACAR.</li> </ul>	Overall	In the event of significant rainfall, following the removal of fauna from the trench	C	
				Evidence	During the reporting period, approximately 20 m of trenching for services installation was conducted at KIOP.				
805:M8.6	<b>Fauna protection from trenches</b>	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"> <li>Construction Trench Inspection Logs.</li> <li>Report of removed fauna and fauna deaths.</li> <li>Correspondence with OPEA associated with submitting report.</li> </ul>	Overall	Provide report to OEPA within 14 days of completion of the construction of each pipeline	C	
				Evidence	During the reporting period, approximately 20 m of trenching for services installation was conducted at KIOP.  No reports of any fauna falling into the trenches.				
805:M9.1	<b>Spider monitoring</b>	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.	CAP req	Implementation of Shield-backed Trapdoor Spider Management and Monitoring Procedures prior to ground disturbing activity.	Overall	Implementation prior to the commencement of ground disturbing activities and then ongoing	NC	
				Evidence	<ul style="list-style-type: none"> <li>The most recent Shield-backed Trapdoor Spider Monitoring occurred in 2019, with no monitoring occurring after. The spider monitoring has been discontinued following re-classification of the species.</li> <li>Following KML's request to remove Condition 9 of MS 805 relating to</li> </ul>				



## AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
					<p>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 s.46(1) of the EP Act on 18/05/2022.</p> <ul style="list-style-type: none"><li>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.</li><li>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.</li><li>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 s.38 of the EP Act on 21/02/2022 and resubmitted the revised referral application to the EPA under s.38C of the EP Act on 30/09/2022, with submission of additional information to the EPA on 22/12/2022. The EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s.38G(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 s.46 of the EP Act has been mostly placed on hold and EPAS expects staging of progression on the s.46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal.</li><li>While the formal assessment of the Proposal continued during the reporting period, DWER-EPAS provided no updates on the progress of removal of Condition 9 of MS805: spider monitoring.</li></ul>				
805:M9.2(1-2)	Spider monitoring	The objective of the monitoring program required by condition 9-1 is to: 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> .	CAP req	<ul style="list-style-type: none"><li>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.</li><li>Monitoring program has the objective of improving knowledge of the ecology and impacts of the proposal on <i>I. nigrum</i>.</li></ul>	Overall	Ongoing	NC	
				Evidence	<ul style="list-style-type: none"><li>The most recent Shield-backed Trapdoor Spider Monitoring occurred in 2019, with no monitoring occurring after. The spider monitoring has been discontinued following re-classification of the species.</li><li>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 s.46(1) of the EP Act on 18/05/2022.</li><li>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.</li><li>KML submitted surrender documentation to DMIRS (now 'DEMIRS') in</li></ul>				



## AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
					<p>June 2021 and surrender of M59/650 was formally registered with the DMIRS (now 'DEMIRS') on 17/08/2021.</p> <ul style="list-style-type: none"> <li>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 s.38 of the EP Act on 21/02/2022 and resubmitted the revised referral application to the EPA under s.38C of the EP Act on 30/09/2022, with submission of additional information to the EPA on 22/12/2022. The EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s.38G(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 s.46 of the EP Act has been mostly placed on hold and EPAS expects staging of progression on the s.46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal.</li> <li>While the formal assessment of the Proposal continued during the reporting period, DWER-EPAS provided no updates on the progress of removal of Condition 9 of MS805: spider monitoring.</li> </ul>				
805:M9.3(1-3)	<b>Spider monitoring</b>	The proponent shall monitor changes in the population in terms of: 1) Number and size of area(s) inhabited by spiders; 2) Number, size and distribution of burrows in occupied areas; and 3) Number of burrows occupied by spiders.	Implementation of spider monitoring procedures identifying: 4) The number, size and area(s) inhabited by spiders; 5) The number, size and distribution of burrows; and 6) The number of burrows occupied by spiders.	CAP req	Implementation of spider monitoring procedures identifying: <ul style="list-style-type: none"> <li>The number, size and area(s) inhabited by spiders;</li> <li>The number, size and distribution of burrows; and</li> <li>The number of burrows occupied by spiders.</li> </ul>	Overall	Ongoing	NC	
				Evidence	<ul style="list-style-type: none"> <li>The most recent Shield-backed Trapdoor Spider Monitoring occurred in 2019, with no monitoring occurring after. The spider monitoring has been discontinued following re-classification of the species.</li> <li>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 s.46(1) of the EP Act on 18/05/2022.</li> <li>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.</li> <li>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.</li> <li>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 s.38 of the EP Act on 21/02/2022 and resubmitted the revised referral application to the EPA under s.38C of the EP Act on 30/09/2022, with submission of additional information to the EPA on 22/12/2022. The EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s.38G(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 s.46 of the EP Act has been mostly placed on hold and EPAS expects staging of progression on the s.46 inquiry to remove Condition 9 of spider</li> </ul>				



# AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
					<p>monitoring as part of the deliberations during assessment of the Proposal.</p> <ul style="list-style-type: none"> <li>While the formal assessment of the Proposal continued during the reporting period, DWER-EPAS provided no updates on the progress of removal of Condition 9 of MS805: spider monitoring.</li> </ul>				
805:M9.4	<b>Spider monitoring</b>	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.	CAP req	Correspondence with the OEPA associated with submitting report including monitoring results and completion of ACAR.	Overall	7 September annually	NC	
				Evidence	<ul style="list-style-type: none"> <li>The most recent Shield-backed Trapdoor Spider Monitoring occurred in 2019, with no monitoring occurring after. The spider monitoring has been discontinued following re-classification of the species.</li> <li>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 s.46(1) of the EP Act on 18/05/2022.</li> <li>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.</li> <li>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.</li> <li>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 s.38 of the EP Act on 21/02/2022 and resubmitted the revised referral application to the EPA under s.38C of the EP Act on 30/09/2022, with submission of additional information to the EPA on 22/12/2022. The EPA decided to assess the Proposal at a level of 'Assess – Proponent Information with additional information required and public review' pursuant to s.38G(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 s.46 of the EP Act has been mostly placed on hold and EPAS expects staging of progression on the s.46 inquiry to remove Condition 9 of spider monitoring as part of the deliberations during assessment of the Proposal.</li> <li>While the formal assessment of the Proposal continued during the reporting period, DWER-EPAS provided no updates on the progress of removal of Condition 9 of MS805: spider monitoring.</li> </ul>				
805:M9.5	<b>Spider monitoring</b>	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	CAP req	Correspondences from the OEPA agreeing to management measures and contingency actions and acknowledgement these have been satisfactorily implemented and completion of ACAR.	Overall	In the event that condition 9-2(1) cannot be met	NC	
				Evidence	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>In a meeting with DWER on 10 September 2021, DWER advised that</li> </ul>				





## AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
					<p>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.</p> <ul style="list-style-type: none"><li>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.</li><li>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.</li><li>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.</li><li>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.</li><li>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.</li></ul>				
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.	CAP req	<ul style="list-style-type: none"><li>Fauna monitoring results.</li><li>Statistics recorded in Fauna Mortality register.</li><li>Western Spiny-tailed Skink, Malleefowl and Shield-backed Trapdoor Spider management and monitoring procedures.</li><li>Completion of ACAR.</li></ul>	Overall	Ongoing	C	
				Evidence Interview	<ul style="list-style-type: none"><li>Environmental Plan – Fauna Management (CORP-EN-PLN-1008).</li><li>Environmental Procedure – Terrestrial Fauna Management CORP-EN-PRO-1010.</li><li>Environmental Plan - Feral Animal Management (CORP-EN-PLN-1009).</li><li>Environmental Procedure - Malleefowl Management and Monitoring (CORP-EN-PRO-1035).</li><li>Environmental Procedure - Western Spiny-tailed Skink Management and Monitoring (CORP-EN-PRO-1024).</li><li>Traffic Management Plan (CORP-HS-PLN-1008) requires vehicles to</li></ul>				





# AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
					<p>travel on existing tracks/roads (no off-road travel), slow down in areas signposted for Malleefowl and to maintain designated speed limits</p> <ul style="list-style-type: none"> <li>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.</li> <li>Pre-ground inspection form includes checklist items that requires area to be inspected for Malleefowl mounds and WStS habitat.</li> <li>KML has installed signage around the site where Malleefowl are active and wildlife crossing. Locations of the signage are on K-Maps and a Fauna Register maintained on Filesite. Posters, toolbox printouts and sighting forms located across the site, toolbox talks run annually, and fauna management is included in the environmental induction to site personnel.</li> <li>KML maintains a Fauna Register that includes records of fauna mortalities. Review of the Fauna Register indicated three occurrences of Malleefowl mortality during the reporting period; however, the mortalities occurred on KML tenements but not as a result of KML operations.</li> <li>No mortalities of WStS were recorded during the reporting period. 2024/25 ACAR – refer to Sections 6.2 and 6.3</li> </ul>				
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.	CAP req	<ul style="list-style-type: none"> <li>Fauna Mortality Register.</li> <li>Completion of ACAR.</li> </ul>	Design	Prior to ground disturbing activity	C	
				Evidence	<ul style="list-style-type: none"> <li>KML maintains a Fauna Mortality Register on Filesite – the register is in use and up to date.</li> <li>Fauna mortality and trapping data reported in ACAR – refer to Sections 6.3 and 6.2.4.</li> </ul>				
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.	CAP req	<ul style="list-style-type: none"> <li>Correspondence to OEPA associated with submitting and complying with plans and procedures.</li> <li>Completion of ACAR.</li> </ul>	Overall	Prior to ground disturbing activity	C	
				Evidence	<ul style="list-style-type: none"> <li>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).</li> <li>No changes to the plans/procedures that would substantially affect management actions for the Project have been made during the audit period.</li> </ul>				
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 the <i>Environment Protection and Biodiversity Conservation Act 1999</i>	CAP req	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).	Overall	As required by DWER	C	
				Evidence	<ul style="list-style-type: none"> <li>No request for plan revisions received from the DWER during the audit period.</li> </ul>				



# AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
805:M11.1	<b>Conservation significant reptiles</b>	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.	CAP req	<ul style="list-style-type: none"> <li>Survey Report.</li> <li>Completion of ACAR.</li> </ul>	Overall	Prior to ground disturbing activity	C	
				Evidence	<ul style="list-style-type: none"> <li>Environmental Procedure – Approvals Request and Ground Disturbance (CORP-EN-PRO-1004) requires a pre-ground disturbance site inspection (Section 4.4.) to be carried out, which includes identification of conservation significant fauna habitat to ensure there are no Western Spiny-tailed Skinks in the area of clearing (Pre Ground Disturbance Site Inspection Form (CORP-EN-FRM-1027)).</li> <li>KML maintains a Western Spiny-tailed Skink Monitoring Register, which contains monitoring data since 2011.</li> <li>WStS monitoring was completed in 2024. Refer to Section 6.2.1 of the 2025 ACAR.</li> </ul>				
805:M11.2	<b>Conservation significant reptiles</b>	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.	CAP req	Adherence to avoidance principles outlined in management plans and content associated with ACAR.	Overall	When conservation significant reptile species are located	C	
				Evidence	<ul style="list-style-type: none"> <li>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 the avoidance sites on GD map (unless otherwise advised by the Environmental Department) for conservation significant flora/fauna including habitats, PECs, heritage sites etc. Procedure also requires a Ground Disturbance Release Form (CORP-EN-FRM-1014) and a pre-GD inspection to be completed within 2 weeks prior to clearing commencing.</li> <li>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;</li> <li>Should any clearing required within 10 metres of the avoidance boundary, the clearing works must be supervised by a spotter.</li> <li>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.</li> </ul>				
805:M11.3	<b>Conservation significant reptiles</b>	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	CAP req	<ul style="list-style-type: none"> <li>Annual reporting on monitoring and translocation of significant reptile species, including the Western Spiny-tailed Skink results.</li> </ul>	Overall	In the event that Condition 11-2 cannot be achieved	C	
				Evidence	<ul style="list-style-type: none"> <li>KML's Western Spiny-tailed Skink Register has been updated with the 2024 monitoring results.</li> <li>Translocation sites annually monitored as shown in Western Spiny-tailed Skink Monitoring Register and monitoring results are reported in ACAR. Refer section 6.2.1 of 2025 ACAR.</li> <li>Translocation procedure described in Section 4.4 of the KML's Environmental Procedure - Western Spiny-Tailed Skink Management, Monitoring and Translocation (CORP-EN-PRO-1024).</li> <li>Skink potential translocation sites viewed on KML's GIS and shown to be at least 6km away from any active mining area.</li> <li>No translocation of Western Spiny-tailed Skinks has occurred during the audit period.</li> </ul>				
805:M11.4	<b>Conservation significant reptiles</b>	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	CAP req	<ul style="list-style-type: none"> <li>"Permit to Take" issued and complied with</li> <li>Completion of ACAR</li> </ul>	Overall	As required by Condition 11-3	C	
				Evidence	<ul style="list-style-type: none"> <li>Authorisation (Section 40) to Take or Disturb Threatened Species (Fauna) TFA 2021-0056-2 expired in January 2025. An application for a new Authorisation has been submitted to DBCA in July.</li> </ul>				



# AUDIT TABLE

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"> <li>No translocation of Western Spiny-tailed Skinks has occurred during the audit period.</li> </ul>				
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.	CAP req <ul style="list-style-type: none"> <li>Correspondence with OEPA and DMP associated with submission and acceptance of rehabilitation schedule.</li> <li>Rehabilitation Monitoring Results.</li> <li>Completion of the ACAR.</li> </ul>	Evidence <ul style="list-style-type: none"> <li>Progressive rehabilitation conducted in accordance with the Environmental Procedure - Land Rehabilitation (CORP-EN-PRO-1002), and monitoring conducted in accordance with the Environmental Procedure - Rehabilitation Performance Monitoring (CORP-EN-PRO-1040).</li> <li>KML maintains a Rehabilitation Schedule (CORP-EN-SCH-1006) that was submitted to and approved by the DWER on 30 August 2013. A revision to the schedule was submitted to the DWER for endorsement in April 2025. A formal endorsement is yet to be received.</li> <li>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) - 2025 ACAR includes data on the progress to targets (70% composition and 10% weeds) (Section 6.5).</li> <li>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.</li> <li>DWER-EPAS is aware this is an ongoing issue and expected it will be resolved when the Proposal is approved under a new Ministerial Statement.</li> </ul>	Overall	As mining progresses	C	
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	CAP req <ul style="list-style-type: none"> <li>Correspondence with OEPA and DMP associated with submission and acceptance of rehabilitation schedule.</li> <li>Rehabilitation Monitoring Results – refer to ACAR</li> <li>Completion of the ACAR.</li> </ul>	Evidence <ul style="list-style-type: none"> <li>Progressive rehabilitation conducted in accordance with the Environmental Procedure - Land Rehabilitation (CORP-EN-PRO-1002), and monitoring conducted in accordance with the Environmental Procedure - Rehabilitation Performance Monitoring (CORP-EN-PRO-1040).</li> <li>KML maintains a Rehabilitation Schedule (CORP-EN-SCH-1006) that was submitted to and approved by the DWER on 30 August 2013. A revision to the schedule was submitted to the DWER for endorsement in April 2025. A formal endorsement is yet to be received.</li> <li>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) - 2025 ACAR includes data on the progress to targets (70% composition and</li> </ul>	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
					10% weeds) (Section 6.5). <ul style="list-style-type: none"> <li>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.</li> <li>DWER-EPAS is aware this is an ongoing issue and expected it will be resolved when the Proposal is approved under a new Ministerial Statement.</li> </ul>				
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"> <li>Correspondence with OEPA and DEMIRS associated with submission and acceptance of rehabilitation schedule.</li> <li>Rehabilitation Monitoring Results.</li> <li>Completion of the ACAR.</li> </ul>	Evidence <ul style="list-style-type: none"> <li>Progressive rehabilitation conducted in accordance with the Environmental Procedure - Land Rehabilitation (CORP-EN-PRO-1002), and monitoring conducted in accordance with the Environmental Procedure - Rehabilitation Performance Monitoring (CORP-EN-PRO-1040).</li> <li>KML maintains a Rehabilitation Schedule (CORP-EN-SCH-1006) that was submitted to and approved by the DWER on 30 August 2013. A revision to the schedule was submitted to the DWER for endorsement in April 2025. A formal endorsement is yet to be received.</li> <li>Rehabilitation monitoring results are provided in Section 6.5 of the 2025 ACAR.</li> </ul>	Overall	As mining progresses	C	
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"> <li>Correspondence between KML, OEPA and DEMIRS.</li> <li>Measures and reports containing monitoring results required by M12-2.</li> <li>Completion of ACAR.</li> </ul>	Evidence <ul style="list-style-type: none"> <li>Mining has not ceased at KIOP.</li> </ul>	Closure	Within six months following the cessation of mining	NR	
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"> <li>Correspondence between KML, OEPA and DEMIRS.</li> <li>Measures and reports containing monitoring results required by M12-2.</li> <li>Completion of ACAR.</li> </ul>	Evidence <ul style="list-style-type: none"> <li>Mining has not ceased at KIOP.</li> </ul>	Closure	Within six months following the cessation of mining	NR	
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	This condition will be assessed following cessation of mining operations.	CAP req <ul style="list-style-type: none"> <li>Correspondence between KML, OEPA and DEMIRS.</li> <li>Measures and reports containing monitoring results required by M12-2.</li> <li>Completion of ACAR.</li> </ul>		Closure	Within six months following the	NR	





# AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS805	Further information
		project (proposal) area at least once each calendar year during spring for seven years.		Evidence	<ul style="list-style-type: none"> <li>Mining has not ceased at KIOP.</li> </ul>		cessation of mining		
805:M12.2.4	<b>Mine Closure and Rehabilitation</b>	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"> <li>Correspondence between KML, OEPA and DEMIRS.</li> <li>Measures and reports containing monitoring results required by M12-2.</li> <li>Completion of ACAR.</li> </ul>	Closure	Within six months following the cessation of mining	NR	
				Evidence	<ul style="list-style-type: none"> <li>Mining has not ceased at KIOP.</li> </ul>				
805:M12.3	<b>Mine Closure and Rehabilitation</b>	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	<ul style="list-style-type: none"> <li>Report prepared and submitted to DWER and DEMIRS.</li> <li>Correspondence between KML, DWER and DEMIRS associated with approval of the report.</li> <li>Completion of ACAR.</li> </ul>	Closure	Within six months following the cessation of mining	NR	
				Evidence	<ul style="list-style-type: none"> <li>Mining has not ceased at KIOP.</li> </ul>				
805:M12.4	<b>Mine Closure and Rehabilitation</b>	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 DEMIRS.	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"> <li>2023/24 ACAR – refer to Section 6.5. In accordance with the 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.</li> <li>2023/24 ACAR was submitted to DWER on August 30, 2024 via email.</li> <li>2023/24 AER (section 3.6 Environmental Group Site – Rehabilitation and Closure Planning) was submitted to DEMIRS on August 30, 2024 via EARS 2.</li> </ul>				
805 M12 5	<b>Mine Closure and Rehabilitation</b>	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	Rehabilitation performance monitoring reports and correspondence showing evidence of submission to DWER and DEMIRS on an annual basis.	Overall	7 September annually	C	
				Evidence	<ul style="list-style-type: none"> <li>2023/24 ACAR – refer to Section 6.5.1. In accordance with the 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.</li> <li>2023/24 ACAR was submitted to DWER on August 30, 2024 via email.</li> <li>2023/24 AER (section 3.6 Environmental Group Site – Rehabilitation and Closure Planning) was submitted to DEMIRS on August 30, 2024 via EARS 2.</li> </ul>				
805 M12 6	<b>Mine Closure and Rehabilitation</b>	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	2023/24 ACAR is publicly available on the KML <a href="#">website</a> .				



## **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 (where relevant)	ACN 070 871 831

### 2. Statement of Compliance Details


Reporting Period	1/07/24 to 30/06/25
------------------	---------------------

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: 

### 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 4.5 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 2024/2025 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 type="checkbox"/> No      X

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 BHNWD04 was not achieved, but this was due to over-abundance of one species (<i>Atriplex codonocarpa</i>), which was not recorded in 2023 but had 267 individuals recorded in 2024.</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 BHNWD04 not meeting the 70% species composition target for MIOP should have been reported to DWER as soon as practicable. As a result, Condition 4.5, which relates to non-compliance reporting, has also been recorded as a non-compliance.</p>

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

INITIALS:



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
What was the cause(s) of the non-compliance or potential non-compliance?
<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>
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>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 under a new Ministerial Statement 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 assessment of the KIOP MLE Proposal and expect to resolve this ongoing non-compliance when the Proposal is approved under a new Ministerial Statement.</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?
As stated above, KML will continue to work closely with the DWER-EPAS during the assessment of the KIOP MLE Proposal and expect to resolve this ongoing non-compliance when the Proposal is approved under a new Ministerial Statement.
<p>Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:</p> <ul style="list-style-type: none"> <li>• in the reporting period addressed in this Statement of Compliance; and</li> <li>• as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.</li> </ul> <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: 15/08/2025.....

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](mailto:compliance@dwer.wa.gov.au)

#### 7. Post Assessment Guidelines and Forms

Post assessment documents can be found at [www.epa.wa.gov.au](http://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*

**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"> <li>ongoing requirements that have been met during the reporting period; and</li> <li>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'.</li> </ul>
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"> <li>audit elements have a finite period of application (e.g. construction activities, development of a document);</li> <li>the action has been satisfactorily completed; and</li> <li>the DWER has provided written acceptance of 'completed' status for the audit element.</li> </ul>
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><b>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</b></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: 



# 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	<b>Proposal Implementation</b>	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.	Overall	Ongoing	C	
				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"> <li>Pits (65.00ha)</li> <li>Waste dumps (118.42ha)</li> <li>Infrastructure (15.53ha)</li> <li>Haul road (21.66ha)</li> <li>Gravel pits (0ha)</li> <li>Powerline corridor (9.28ha)</li> <li>Rail siding (0ha)</li> </ul>				
806:M2.1	<b>Proponent Nomination and Contact Details</b>	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.	Overall	Approval void 9 September 2014 if project not substantially commenced	C	
				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.				
806:M2.2	<b>Proponent Nomination and Contact Details</b>	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.	Overall	Within 30 days of such change	C	
				Evidence	The Proponent details are consistent with the company details on the KML website ( <a href="#">Karara Mining</a> ). 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.				
806:M3.1	<b>Time Limit of Authorisation</b>	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.	Overall	Approval void 9 September 2014 if project not substantially commenced	CLD	
				Evidence	Audited as compliant in previous audit period, no further action required.				
806:M3.2	<b>Time Limit of Authorisation</b>	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 OPEA which demonstrates that the proposal has substantially commenced	CAP req.	The Compliance Assessment Report indicates proposal has substantially commenced on or before expiration of five years of statement	Overall	Provide letter to DWER on or before 9 September 2014	CLD	
				Evidence	Audited as compliant in previous audit period (copy of audit report in 2020 ACAR), no further action required.				
806:M4.1	<b>Compliance Reporting</b>	The proponent shall prepare and maintain a compliance assessment plan 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"> <li>The preparation of a CAP.</li> <li>Advice from OEPA advising that the CAP is satisfactory.</li> </ul>	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"> <li>Correspondence received from OEPA (dated 21/08/2014) stating CAP submitted with letter dated 11/07/2014, meets the requirements of Condition 4-2</li> <li>The latest CAP included in 2020 ACAR (dated 25/08/2020) - sighted.</li> <li>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.</li> <li>Letter received from DWER 30/07/2020 advising that revised CAPs meet the requirements of Condition 4-1.</li> </ul>				
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.	Design	Prior to implementation of the proposal	CLD	
				Evidence	<ul style="list-style-type: none"> <li>Correspondence received from OEPA (dated 21/08/2014) stating CAP submitted with letter dated 11/07/2014, meets the requirements of Condition 4-2</li> <li>The latest CAP included in 2020 ACAR (dated 25/08/2020) sighted.</li> <li>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.</li> <li>Letter received from DWER 30/07/2020 advising that revised CAPs meet the requirements of Condition 4-1.</li> </ul>				
806:M4.2.(1-6)	Compliance Reporting	The compliance assessment plan shall indicate: <ol style="list-style-type: none"> <li>the frequency of compliance reporting;</li> <li>the approach and timing of compliance assessments;</li> <li>the retention of compliance assessments;</li> <li>reporting of non-compliances and corrective actions taken;</li> <li>the table of contents of compliance assessment reports; and</li> <li>public availability of compliance assessments reports.</li> </ol>	The CAP shall indicate the: <ol style="list-style-type: none"> <li>Frequency of compliance reporting</li> <li>Approach and timing of compliance assessments</li> <li>Retention of compliance assessments</li> <li>Method of reporting of potential non-compliances and corrective actions taken</li> <li>Table of contents of compliance assessment reports; and</li> <li>Public availability of Compliance Assessment Reports</li> </ol>	CAP req.	Content within the CAP.	Design	Prior to implementation of the proposal and as required thereafter	C	
				Evidence	<p>The latest MIOP CAP (Revision 8 dated 16/06/2020) states:</p> <ul style="list-style-type: none"> <li>Compliance assessment approach and frequency (refer to Section 3 of the CAP).</li> <li>Retention of compliance assessments (refer to Section 5 of the CAP).</li> <li>Method of reporting of potential non-compliances and corrective actions taken (refer to Section 4 and Appendix 2 of the CAP).</li> <li>The CAP includes a general table of contents and table of contents of compliance assessment reports (refer to Appendix 3 of the CAP).</li> <li>Public availability of ACAR (refer to Section 7 of the CAP).</li> </ul>				
806:M4.3	Compliance Reporting	The proponent shall assess compliance with conditions in accordance with the compliance assessment plan required by condition 4-1.	This ACAR shall indicate compliance with CAP conditions	CAP req.	Confirm that the ACAR complies with CAP conditions.	Overall	31 August annually	C	
				Evidence	2023/24 ACAR included assessment of compliance against (Appendix C: MS806 Statements of Compliance)				
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.	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"> <li>2023/24 ACAR and previous ACARs are retained in Folder 9.1 of KML's Environment SharePoint site - sighted.</li> <li>A copy of the 2023/24 ACAR is retained on KML Document Management System and KML's intranet - sighted.</li> </ul>				



# AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

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	CAP req.	<ul style="list-style-type: none"> <li>Letter to OEPA advising of non-compliances.</li> <li>Non-compliance reports and correspondence between OEPA and KML on non-compliance.</li> </ul>	Overall	As soon as practicable and within seven days of the non-compliance being confirmed by KML	NC	
				Evidence	<ul style="list-style-type: none"> <li>Whilst a review of the KML Incident Management System INX In-Control found no non-compliance against Statement conditions were reported during the reporting period, one minor non-compliance was identified during this audit. This was associated with not meeting the 70% species composition target for MIOP (monitoring quadrat BHNWD04) within five years of following the cessation of productive mining, as required by Condition 11.1.1a.</li> <li>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.</li> <li>DWER was aware this is an ongoing non-compliance during their audit on the MS806 in September 2021 – Statement 806 Compliance Audit Report 2021.</li> <li>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 2023/24 ACAR for MIOP.</li> </ul>				
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	CAP req.	Correspondence between KML and OEPA demonstrating annual submission of reports and submission of ACAR by 31 August annually, with the reporting period aligned to the previous financial period (1 July – 30 June).	Overall	Submit a Compliance Assessment Report on 31 August annually	C	
				Evidence	2023/24 ACAR submitted to the OEPA on the 30/08/2024 – submission email sighted.				
806M:4.6(1-5)	Compliance Reporting	The compliance assessment report shall: <ol style="list-style-type: none"> <li>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;</li> <li>Include a statement as to whether the proponent has complied with the conditions;</li> <li>Identify all non-compliances and describe corrective and preventative actions taken;</li> <li>Be made publicly available in accordance</li> </ol>	<ol style="list-style-type: none"> <li>Compilation of associated compliance assessment reports that is endorsed by KML's Chief Executive Officer or delegate</li> <li>Compliance Assessment Reports submitted to OEPA</li> <li>ACAR submitted to OEPA</li> <li>Make reports publicly available in accordance with PAG4 Post Assessment Guideline for Making information publicly available (OPEA, 2012c)</li> <li>Completed Compliance Assessment</li> </ol>	CAP req.	<ul style="list-style-type: none"> <li>Compilation of associated compliance assessment reports that is endorsed by KML's CEO or delegate.</li> <li>Compliance Assessment Report submitted to OEPA reports compliance with the Statements conditions.</li> <li>Compliance Assessment Report submitted to OEPA reports non-compliances and corrective and preventative actions.</li> <li>The Compliance Assessment Report will be made available to stakeholders, including members of the public, upon request and within 7 days of the proponent receiving the request.</li> <li>Completed Compliance Assessment Report indicating changes to the CAP.</li> </ul>	As above	As above	C	





# AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS806	Further information
		with the approved compliance assessment plan; and 5) Indicate any proposed changes to the compliance assessment required by condition 4-1.	Reports indicating changes to the CAP	Evidence	<ul style="list-style-type: none"><li>2023/24 ACAR was endorsed by the delegate of KML's CEO – the endorsed 2023/24 ACAR sighted.</li><li>2023/24 ACAR included assessment of compliance (Appendix C: MS806 Statement of Compliance and Audit Table).</li><li>Review of INX InControl found no non-compliances against Statement conditions were reported during the reporting period, and no incidents currently under investigation that may potentially non-compliant against Statement conditions.</li><li>2023/24 ACAR is available within KML's Document Management System and on KML's website, which is available to public members - sighted.</li><li>No updates to the current CAP (revision 2, dated 16/06/2020) was proposed in the 2023/24 ACAR.</li></ul>				
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:		Evidence	Compilation of associated Performance Review Reports.	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	
				CAP req.	<ul style="list-style-type: none"><li>PRR for 2010 received by OEPA on 12/01/2011 (1<sup>st</sup> Year)</li><li>PRR for 2011 received by OEPA on 4/01/2012 (2<sup>nd</sup> Year)</li><li>PRR for 2013 submitted 8<sup>th</sup> November 2013 (4<sup>th</sup> year)</li><li>PRR for 2015 sent to OEPA via e-mail on 22/01/2016 (6<sup>th</sup> Year)</li><li>PRR for 2017 to be submitted to OEPA by December 2017 (8<sup>th</sup> Year)</li><li>PRR for 2019 submitted to OEPA on 08 May 2020 (10<sup>th</sup> year)</li><li>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.</li></ul> No PRR was required during this audit period.				
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	CAP req.	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.	As above	As above	CLD	
				Evidence	No PRR required during this audit period.				
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	CAP req.	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.	As above	As above	CLD	
				Evidence	No PRR required during this audit period				
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.	CAP req.	Compilation of associated PRRs that identify significant improvements gained in environmental management.	As above	As above	CLD	
				Evidence	No PRR required during this audit period				
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)	CAP req.	Performance Review Reports made available to stakeholders, including members of the public, upon request and within 7 days of the proponent receiving the request.	Overall	Within 7 days of the proponent receiving the request.	C	
				Evidence	<ul style="list-style-type: none"><li>PRRs available in KML document control system.</li><li>During the audit period, no stakeholders, including members of the public, had requested a copy of the PRR.</li></ul>				



# AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence	Phase	When	Status MS806	Further information
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.	Establishment and implementation of the following KML procedures prior to construction: <ul style="list-style-type: none"> <li>Approvals Request and Ground Disturbance Procedure that includes a requirement to delineate the PEC; and</li> <li>Effective incident reporting process.</li> </ul>	<div>CAP req. <ul style="list-style-type: none"> <li>A Ground Disturbance Process that includes measures to restrict areas of works to the delineated approved areas.</li> <li>Works conducted within the delineated areas and an effective incident reporting process.</li> </ul> </div> <div>Evidence <ul style="list-style-type: none"> <li>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 rev 5) 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.</li> <li>AR/GD Register sighted.</li> <li>Sighted GDs in Environment SharePoint site folder 4.4.</li> <li>No breaches associated with Ground Disturbances were reported during the audit period under MS806.</li> <li>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.</li> <li>No new disturbance under MS806 occurred at MIOP during the audit period.</li> </ul> </div>	Construction	During ground disturbing activities	C	
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.	<div>CAP req. 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. </div> <div>Evidence KML's EMS contains the following key documents which include relevance to minimum clearing and reducing impacts and/or PEC protection from mining activities: <ul style="list-style-type: none"> <li>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.</li> <li>Environmental Procedure – Approvals Requests and Ground Disturbance (CORP-EN-PRO-1004 rev 5).</li> <li>Environmental Procedure – Flora, Weeds and Plant Pathogens (CORP-EN-PRO-1009 rev 5).</li> <li>Environmental Plan – Flora and Vegetation Health Monitoring Plan (CORP-EN-PLN-1012 rev 6).</li> <li>Environmental Plan – Dust Management Plan (CORP-EN-PLN-1010 rev 6) includes management measures for mine related fugitive dust emissions based on 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.</li> <li>Environmental Procedure – Dust Monitoring (CORP-EN-PRO-1005 rev 6).</li> <li>Environmental Procedure – Terrestrial Fauna Management (CORP-EN-PRO-1010 rev 5).</li> <li>Environmental Plan – Environmental Waste Management (CORP-EN-PLN-1013 rev 3) outlines management actions of non-mineral waste generated from operations activities including management actions of hydrocarbons, hazardous wastes and other controlled wastes.</li> <li>Storage and Use of Hazardous Substance Standard (CORP-HS-STD-1042 rev 1).</li> <li>Environmental Procedure – Feral Animal Management and Monitoring</li> </ul> </div>	Operation	Ongoing	C	



# AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS806	Further information
					(CORP-EN-PRO-1050 rev 2). <ul style="list-style-type: none"><li>Environmental Management Plan (CORP-EN-PLN-1020 rev 4) 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.</li><li>Environmental Plan – Flora and Vegetation Management (CORP-EN-PLN-1011 rev 1) outlines management actions for flora and vegetation, specific action for high impact (priority) flora and vegetation, and contingencies.</li></ul> Most of the above environmental plans and procedures have been reviewed and updated during the audit period and available at KML's intranet – sighted. The 2024 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.				
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.	CAP req.	Review 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.	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"><li>Environmental Procedure – Approvals Requests and Ground Disturbance (CORP-EN-PRO-1004 rev 5) includes requirements when ground disturbance/clearing is proposed in close proximity to PECs, and post disturbance survey pick-up to confirm no over clearing.</li><li>AR/GD Register sighted.</li><li>Sighted GDs in Environment SharePoint site folder 4.4.</li><li>Environmental Plan – Dust Management Plan (CORP-EN-PLN-1010 rev 6) 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.</li><li>Monitoring of the flora and health of the PEC conducted as per section 4.2 of the Flora and Vegetation Health Monitoring Plan (CORP-EN-PLN-1012 rev 6). Records of vegetation health monitoring data show regular monitoring against weeds, dust, dust suppression water overspray, fauna impact and fire impact.</li><li>Induction includes education on importance of clearing control, weeds, dust, dust suppression water overspray, feral animals and fire.</li><li>Sighted toolbox materials covering key environmental awareness topics.</li><li>Sighted Environmental Awareness Training folder in Filesite that contains posters and toolbox and awareness training materials covering a range of key topics.</li><li>Sighted posters covering key environmental awareness topics.</li><li>Monitoring of weeds, fire, feral animals, dust deposition and dust suppression water overspray (as per section 4 of the Flora and Vegetation Health Monitoring Plan (CORP-EN-PLN-1012 rev 6) - sighted.</li><li>Restricted access signage and rehabilitation signage in locations around site.</li></ul>				
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	Establishment and implementation of KML Environmental Management System, including key procedures for ground disturbance, flora and	CAP req.	Review implementation of KML Environmental Management System, including key procedures for ground disturbance procedure, flora and vegetation, traffic management, signage restricting access and training programs.	Overall	Ongoing	C	



# AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS806	Further information
		vegetation complex Priority Ecological Community to authorised personnel only.	vegetation, traffic management, and training programs.	Evidence	<ul style="list-style-type: none"> <li>Traffic Management Plan (CORP-HS-PLN-1008 rev 4) includes requirement for no off-road driving (vehicles to remain on identified tracks), all care to be taken to endure flora and fauna are not affected.</li> <li>KML Environmental Plan – Flora and Vegetation Health Monitoring (CORP-EN-PLN1012 rev 6) 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.</li> <li>Environmental Procedure – Approvals Requests and Ground Disturbance (CORP-EN-PRO-1004 rev 5) 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.</li> <li>Restricted access signage and rehabilitation signage in locations around site.</li> </ul>				
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.	CAP req.	<ul style="list-style-type: none"> <li>Monitoring results associated with the Dust, Flora and fauna, traffic management and training programs in relation to the PEC in ACAR.</li> <li>Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA.</li> </ul>	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"> <li>Flora and Vegetation Health Monitoring Plan (CORP-EN-PLN-1012 rev 6) describes monitoring to occur in PEC.</li> <li>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.</li> <li>Monitoring results for vegetation health, dust, saline water, erosion, feral animals and fire captured in section 6.4 of 2024/25 ACAR.</li> </ul>				
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.	CAP req.	<ul style="list-style-type: none"> <li>Monitoring results associated with the dust, flora and fauna, traffic management and training programs in relation to the PEC in ACAR.</li> <li>Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA.</li> </ul>	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"> <li>Refer 2024/25 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.</li> <li>Refer 2024/25 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.</li> <li>Review of the KML Incident Management System INX In-Control indicated no incidents of PEC vegetation health decline in relation to the use of saline water for dust suppression.</li> </ul>				
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	Establishment and implementation of KML Environmental Management System, including key monitoring procedures for fire, flora and fauna, traffic management, and training programs.	CAP req.	<ul style="list-style-type: none"> <li>Monitoring results associated with the fire, flora and fauna, traffic management access and training programs in relation to the PEC in ACAR.</li> <li>Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA.</li> </ul>	Overall	Ongoing	C	





# AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS806	Further information
		monitoring is to be 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	<b>Priority Ecological Community</b>	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.	<ul style="list-style-type: none"> <li>Monitoring results associated with feral animals, flora and fauna, traffic management and training programs in relation to the PEC in ACAR.</li> <li>Correspondence between KML and OEPA confirming the monitoring is being carried out to the satisfaction of the OEPA.</li> </ul>	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"> <li>Feral fauna monitoring measures described in Environment Plan - Feral Animal Management (CORP-EN-PLN-1009 rev 6).</li> <li>Monitoring and trapping results are included in section 6.2.4 of the 2023/24 ACAR.</li> </ul>				
806:M6.6	<b>Priority Ecological Community</b>	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.	Overall	Immediately, in the event that the outcome of condition 6-1 is not being met or are not likely to be met.	C	
				Evidence	<ul style="list-style-type: none"> <li>Review of the KML Incident Management System INX In-Control 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.</li> <li>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.</li> </ul>				
806:M7.1	<b>Groundwater dependant vegetation</b>	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	<b>Groundwater dependant vegetation</b>	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	<b>Groundwater dependant vegetation</b>	The proponent shall monitor groundwater levels within and near to the gilgai 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	<b>Groundwater dependant vegetation</b>	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	<b>Groundwater dependant vegetation</b>	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.





# AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS806	Further information
806:M8.1	<b>Fauna protection from trenches</b>	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"> <li>Trench length limit included in contractor specifications; and</li> <li>Regular inspections to verify that open trenches do not exceed maximum length.</li> </ul>	CAP req.	<ul style="list-style-type: none"> <li>Construction Trench Inspection Logs including measure of trench length open at any one time.</li> <li>Completion of ACAR.</li> </ul>	Overall	Ongoing	CLD	KML submitted a Pipeline Corridor Completion Fauna Report to fulfil Condition. This was received by OEPA on 9 November 2011.
				Evidence	<ul style="list-style-type: none"> <li>The requirements of these conditions are captured in section 4.8 the Environmental Procedure – Terrestrial Fauna (CORP-EN-PRO-1010 rev 5) and communicated to contractors via the induction.</li> <li>KML submitted a Pipeline Corridor Completion Fauna Report to fulfil Condition. This was received by OEPA on 9 November 2011.</li> </ul>				
806:M8.2	<b>Fauna protection from trenches</b>	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"> <li>Requirement for fauna refuges/ramps included in contractor specifications; and</li> <li>Inspections to verify that fauna refuges/ramps are in place at the required spacing.</li> </ul>	CAP req.	<ul style="list-style-type: none"> <li>Construction Trench Inspection Logs including verification fauna refuges being in place at the required spacing.</li> <li>Copies of contractor specification documents.</li> <li>Completion of ACAR.</li> </ul>	Overall	Ongoing	CLD	KML submitted a Pipeline Corridor Completion Fauna Report to fulfil Condition. This was received by OEPA on 9 November 2011.
				Evidence	KML submitted a Pipeline Corridor Completion Fauna Report to fulfil Condition. This was received by OEPA on 9 November 2011.				
806:M8.3	<b>Fauna protection from trenches</b>	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	CLD	KML submitted a Pipeline Corridor Completion Fauna Report to fulfil Condition. This was received by OEPA on 9 November 2011.
				Evidence	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.				
806:M8.4	<b>Fauna protection from trenches</b>	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"> <li>Construction trench Inspection Logs; and</li> <li>Requirements for inspection and removal of fauna by fauna handlers included in contractor specifications.</li> </ul>	CAP req.	<ul style="list-style-type: none"> <li>Construction Trench Inspection Logs.</li> <li>Completion of ACAR.</li> </ul>	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	
				Evidence	KML submitted a Pipeline Corridor Completion Fauna Report to fulfil Condition. This was received by OEPA on 9 November 2011.				



# AUDIT TABLE

**PROPOSAL:** Mungada Iron Ore Project  
**STATEMENT:** 806

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS806	Further information
806:M8.5	<b>Fauna protection from trenches</b>	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"> <li>Construction trench inspection logs, and</li> <li>Requirements in the event of significant rainfall included in contractor specifications.</li> </ul>	CAP req.	<ul style="list-style-type: none"> <li>Construction Trench Inspection Logs.</li> <li>Copies of contractor specification documents.</li> <li>Completion of ACAR.</li> </ul>	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	KML submitted a Pipeline Corridor Completion Fauna Report to fulfil Condition. This was received by OEPA on 9 November 2011.				
806:M8.6	<b>Fauna protection from trenches</b>	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"> <li>Construction Trench Inspection Logs.</li> <li>Report of removed fauna and fauna deaths.</li> <li>Correspondence with OEPA associated with submitting report.</li> </ul>	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	KML submitted a Pipeline Corridor Completion Fauna Report to fulfil Condition. This was received by OEPA on 9 November 2011.				
806:M9.1	<b>Fauna mortality register</b>	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"> <li>Fauna monitoring results.</li> <li>Statistics recorded in Fauna Mortality register.</li> <li>Western Spiny-tailed Skink, Malleefowl and Shield-backed Trapdoor Spider management and monitoring procedures.</li> <li>Completion of ACAR.</li> </ul>	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"> <li>Environmental Plan – Fauna Management (CORP-EN-PLN-1008 rev 6).</li> <li>Environmental Procedure – Terrestrial Fauna Management (CORP-EN-PRO-1010 rev 5).</li> <li>Environmental Procedure - Feral Animal Management and Monitoring (CORP-EN-PLN-1009 rev 2).</li> <li>Environmental Procedure - Malleefowl Management and Monitoring (CORP-EN-PRO-1035 rev 5).</li> <li>Environmental Procedure - Western Spiny-tailed Skink Management and Monitoring (CORP-EN-PRO-1024 rev 5).</li> <li>Traffic Management Plan (CORP-HS-PLN-1008 rev 4) 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.</li> <li>Environmental Procedure – Approvals Requests and Ground Disturbance (CORP-EN-PRO-1004 rev 5) 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.</li> <li>Pre-ground inspection form includes checklist items that require area to be inspected for Malleefowl mounds and known WStS habitat.</li> <li>Fauna awareness signage has been installed around areas where Malleefowl are active.</li> <li>KML Fauna Register which includes records of fauna mortalities – sited on the Environment SharePoint folder.</li> <li>Fauna deaths and trapping data reported in sections 6.2.4 and 6.3 of 2024-25 ACAR.</li> </ul>				
806:M9.2	<b>Fauna mortality register</b>	Prior to ground disturbing activity the proponent shall prepare and implement a Fauna Mortality Register	Preparation and implementation of a Fauna Mortality register.	CAP req.	<ul style="list-style-type: none"> <li>Fauna Mortality Register.</li> <li>Completion of ACAR.</li> </ul>	Design	Prior to ground disturbing activity.	CLD	



# AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS806	Further information
		for conservation significant species in the proposal area.		Evidence	<ul style="list-style-type: none"> <li>Sighted KML Fauna Mortality register – register in use and up to date</li> <li>Fauna deaths and trapping data reported in sections 6.2.4 and 6.3 of 2024 ACAR.</li> </ul>				
806:M9.3	Fauna mortality register	The proponent shall submit the strategies required by condition 9-1 to the CEO.	Submission to OEPA of key plans and strategies, including Western Spiny tailed skink, Malleefowl and Shield-backed Trapdoor Spider management and monitoring procedures.	CAP req.	<ul style="list-style-type: none"> <li>Correspondence to OEPA associated with submitting and complying with plans and procedures.</li> <li>Completion of ACAR.</li> </ul>	Design	Prior to ground disturbing activity.	CLD	
				Evidence	<ul style="list-style-type: none"> <li>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 rev 5) and Environmental Procedure – Malleefowl Management and Monitoring (CORP-EN-PRO-1035 rev 5) 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 'DCCEEV') – refer below.</li> <li>Malleefowl and Western Spiny-tailed Skink are regulated under the 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.</li> <li>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.</li> </ul>				
806:M9.4	Fauna mortality register	The proponent shall review and revise the strategies required by condition 9-1 as required by the CEO.	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>	CAP req.	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).	Overall	As required by OEPA	C	
				Evidence	<ul style="list-style-type: none"> <li>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 'DCCEEV') – refer to evidence in audit code 805:M10.3.</li> <li>No request for plan revisions received from the EPAS during the audit period.</li> </ul>				



## AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

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.	CAP req.	Survey Report. Completion of ACAR.	Overall	Prior to ground disturbing activities.	C	
				Evidence	<ul style="list-style-type: none"><li>Environmental Procedure – Approvals Request and Ground Disturbance (CORP-EN-PRO-1004 rev 5) 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.</li><li>Section 4.4 of the Environmental Procedure – Approvals Request and Ground Disturbance requires a pre ground disturbance site 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)).</li><li>Western Spiny-tailed Skink Monitoring Register contains monitoring data from 2011-present – sighted.</li><li>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.</li><li>WStS monitoring was completed in 2024. Refer section 6.2.1 of 2024/25 ACAR.</li></ul>				
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.	CAP req.	Adherence to avoidance principles outlined in management plans and content associated with Compliance Assessment Report.	Overall	When conservation significant reptile species are located.	C	
				Evidence	<ul style="list-style-type: none"><li>Section 4.3.2 of the Environmental Procedure – Approvals Request and Ground Disturbance (CORP-EN-PRO-1004 rev 5) 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.</li><li>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.</li><li>If any clearing is required within 10m of the ground disturbance boundary, the clearing works must be supervised by a spotter.</li><li>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.</li><li>No translocation of conservation significant reptiles occurred at MIOP during the audit period.</li><li>Review of KML Incident Management System INX In-Control indicated no occurrences of Western Spiny-tailed Skink mortalities during the audit period.</li></ul>				
806:M10.3	Conservation significant reptiles	Relocation of conservation significant reptile species as required by condition 10-2 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 [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].	CAP req.	Annual reporting on monitoring and translocation of significant reptile species, including the Western Spiny-tailed Skink results.	Overall	In the event that condition 10-2 cannot be achieved	C	
				Evidence	<ul style="list-style-type: none"><li>Translocation sites regularly monitored as shown in Western Spiny-tailed Skink Monitoring Register and monitoring results are reported in ACAR. Refer to section 6.2.1 of 2024/25 ACAR.</li><li>Translocation procedure described in section 4.4 of the Environmental Procedure - Western Spiny-Tailed Skink Management, Monitoring and Translocation CORP-EN-PRO-1024.</li><li>No translocation of conservation significant reptiles occurred at MIOP during audit period.</li></ul>				





## AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS806	Further information
806:M11.1.1.a	<b>Mine Closure and Rehabilitation</b>	As mining progresses, the proponent shall commence progressive rehabilitation of the mine site area in accordance with the following:  (1) 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:  (a) 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 OEPA and Director Environment of the Department of Mines and Petroleum in Annual Environmental Report.	CAP req.	<ul style="list-style-type: none"><li>Correspondence with OEPA and DMP associated with submission and acceptance of rehabilitation schedule.</li><li>Rehabilitation Monitoring Results.</li><li>Completion of ACAR.</li></ul>	Overall	As mining progresses	NC	Mining at MIOP ceased in September 2014. Although the species diversity recorded at individual quadrat below the target of 70%, an average of 70% species composition was achieved for MIOP as a whole for the area across nine years of monitoring.
				Evidence	<ul style="list-style-type: none"><li>Progressive rehabilitation committed to in Environmental Management Plan (CORP-EN-PLN-1020 rev 4).</li><li>KML maintains a rehabilitation schedule (CORP-EN-SCH-1006), which was submitted to and approved by the DWER on 30 August 2013 and further revised and submitted to DWER in April 2025.</li><li>Condition 11-1 of MS 806 (flora and vegetation are re-established with not less than 70 percent species composition) has been captured in the Environmental Procedure - Rehabilitation Performance Monitoring (CORP-EN-PRO-1040 rev 2). Section 6.5 of 2025 ACAR includes data on the progress to targets (70% composition and 10% weeds).</li><li>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.</li><li>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 (BHNWD04 recording 39.4%). Therefore, compliance for this condition has not been achieved. It should be noted that although the species diversity recorded at BHNWD04 is still below the target of 70%, an average species density of 91% for all Blue Hill North WRD rehabilitation quadrats was achieved across ten years of monitoring.</li><li>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 BHNWD04 quadrat, which historically was recorded below the target from 2016 to 2020. During the reporting period the species diversity index recorded at this quadrat has slightly decreased from 1.85 in 2023 to 0.65 in 2024. The decrease in the diversity Shannon index at BHNWD04 could be potentially associated with a significant increase in abundance of one species (<i>Atriplex codonocarpa</i>) as no individuals were recorded in 2023, while that 267 individuals were recorded in 2024. 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.</li></ul>				
806:M11.1.1.b	<b>Mine Closure and Rehabilitation</b>	As mining progresses, the proponent shall commence progressive rehabilitation of the mine site area in accordance with the following:  (1) 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:  (b) 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.	CAP req.	<ul style="list-style-type: none"><li>Correspondence with OEPA and DMP associated with submission and acceptance of rehabilitation schedule.</li><li>Rehabilitation Monitoring Results.</li><li>Completion of ACAR.</li></ul>	Overall	As mining progresses	C	
				Evidence	<ul style="list-style-type: none"><li>KML is committed to progressive rehabilitation as outlined in the Environmental Management Plan (CORP-EN-PLN-1020 rev 4).</li><li>KML maintains a rehabilitation schedule, which was submitted to and approved by the DWER in 30 August 2013, and further revised and submitted to the DWER in April 2025.</li><li>Refer section 6.5.3 and 6.5.4 of 2024/25 ACAR – during the reporting period, all of the 13 MIOP monitoring sites recorded weed coverage of less than 1%.</li></ul>				





## AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS806	Further information
806:M11.1.2	<b>Mine Closure and Rehabilitation</b>	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.	CAP req.	<ul style="list-style-type: none"><li>Correspondence with OEPA and DMP associated with submission and acceptance of rehabilitation schedule.</li><li>Rehabilitation Monitoring Results.</li><li>Completion of ACAR.</li></ul>	Overall	As mining progresses	C	
				Evidence	<ul style="list-style-type: none"><li>Progressive rehabilitation committed to in Environmental Management Plan (CORP-EN-PLN-1020 rev 4).</li><li>KML maintains a rehabilitation schedule (CORP-EN-SCH-1006), which was submitted to and approved by the DWER on 30 August 2013 and further revised and submitted to DWER in April 2025.</li><li>Section 6.5 of 2024/25 ACAR includes detail on rehabilitation.</li></ul>				
806:M11.2.1	<b>Mine Closure and Rehabilitation</b>	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"><li>Correspondence between KML, OEPA and DMP.</li><li>Measures and reports containing monitoring results required by M11-2.</li><li>Completion of ACAR.</li></ul>	Closure	Within six months following the cessation of mining.	C	
				Evidence	<ul style="list-style-type: none"><li>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.</li><li>Environmental Procedure - Feral Animal Management and Monitoring (CORP-EN-PRO-1050 rev 2) addresses how feral animals will be controlled and monitored.</li><li>Section 6.2.4 of 2024/25 ACAR details 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.</li></ul>				
806:M11.2.2	<b>Mine Closure and Rehabilitation</b>	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"><li>Correspondence between KML, OEPA and DMP.</li><li>Measures and reports containing monitoring results required by M11.2.</li><li>Completion of ACAR.</li></ul>	Closure	Within six months following the cessation of mining for seven years.	CLD	
				Evidence	<ul style="list-style-type: none"><li>The Environmental Procedure - Feral Animal Management and Monitoring (CORP-EN-PRO-1050 rev 2) outlines the methods for feral fauna monitoring and controlling.</li><li>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 as 'closed'.</li></ul>				



# AUDIT TABLE

PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS806	Further information
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.	CAP req.	<ul style="list-style-type: none"> <li>Correspondence between KML, OEPA and DMP.</li> <li>Measures and reports containing monitoring results required by M11.2.</li> <li>Completion of ACAR.</li> </ul>	Closure	Within six months following the cessation of mining.	CLD	
				Evidence	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'.				
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.	CAP req.	<ul style="list-style-type: none"> <li>Correspondence between KML, OEPA and DMP.</li> <li>Measures and reports containing monitoring results required by M11.2.</li> <li>Completion of ACAR.</li> </ul>	Closure	Within six months following the cessation of mining.	C	
				Evidence	<ul style="list-style-type: none"> <li>Section 6.2.4 of 2023/24 ACAR details the feral animal monitoring, sightings, and trapping records.</li> <li>Section 6.4.1 of 2024/25 ACAR covers monitoring of flora and vegetation health, which conducted annually by an external consultant. Results to date show overall vegetation health at MIOP has not declined.</li> <li>Section 6.5 of 2024/25 ACAR includes detail on rehabilitation.</li> </ul>				
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.	CAP req.	<ul style="list-style-type: none"> <li>Report prepared and submitted to OEPA and DMP.</li> <li>Correspondence between KML, OEPA and DMP associated with approval of the report.</li> <li>Completion of ACAR</li> </ul>	Closure	Within five years of the cessation of mining.	NR	
				Evidence	<ul style="list-style-type: none"> <li>The Mungada Iron Ore Project Post-Closure Pit Lake Management Plan was submitted to DWER on 27/09/2019 (DWERDT207175).</li> <li>The MIOP Pit Lake Management Plan was further revised and resubmitted to DWER on 18/02/2025 – sighted.</li> <li>As the Blue Hills North and Terapod West Pits are currently used to receive pit water from KIOP operations, DWER advised on 29/04/2025 that the Plan does not meet the requirements of Condition 11-3 of MS 806. The ongoing pumping activities are preventing the formation of permanent pit lake, meaning the long-term impacts may not be evident until pumping ceases.</li> <li>DWER has advised that the Plan should be revised and resubmitted for review once pumping ceases in 2039.</li> </ul>				
806:M11.4	Mine Closure and Rehabilitation	In liaison with the Department of Environment and 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.	Progressive monitoring of rehabilitation. Establishment and implementation of plans and procedures to address progressive rehabilitation and rehabilitation monitoring, including rates of rehabilitation.	CAP req.	Report on rehabilitation monitoring results submitted to OEPA and DMP.	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"> <li>2023/24 ACAR includes detail on rehabilitation in section 6.5. 2023/24 ACAR was submitted to the DWER on 30/08/2024 – email sighted.</li> <li>Rehabilitation monitoring results were submitted in the AER to the DEMIRS via EARS2 on 30/08/2024 – 2023/24 AER sighted in EARS2.</li> <li>Rehabilitation monitoring is conducted annually in September. KML Rehabilitation Data Register sighted and most recent monitoring dated September 2024.</li> <li>Rehabilitation monitoring results were submitted to the DWER and the DEMIRS in 2024 in ACAR and AER respectively.</li> </ul>				
806:M11.5	Mine Closure and Rehabilitation	The proponent shall submit annually a report of the rehabilitation performance monitoring required by	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.	Overall	31 August Annually	C	



AUDIT TABLE  
PROPOSAL: Mungada Iron Ore Project  
STATEMENT: 806

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS806	Further information
	Rehabilitation	condition 11-4 to the CEO of the Department of Environment and Conservation and the Director Environment of the Department of Mines and Petroleum.		Evidence	<ul style="list-style-type: none"><li>2023/24 ACAR includes detail on Rehabilitation (section 6.5). 2023/24 ACAR was submitted to DWER on 30/08/2024 – email sighted.</li><li>Rehabilitation details were submitted in the AER to the DEMIRS via EARS2 on 30/08/2024 – 2023/24 AER sighted in EARS2.</li><li>Rehabilitation monitoring is conducted annually in September. KML Rehabilitation Data Register sighted and most recent monitoring dated September 2024.</li><li>Rehabilitation monitoring results were submitted to the DWER and the DEMIRS in 2024 in ACAR and AER respectively.</li></ul>				
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.	Overall	Within 7 days of the proponent receiving the request.	C	
				Evidence	The MIOP rehabilitation monitoring information is detailed in sections 6.5.3 and 6.5.4 of 2023/24 ACAR, which is available in KML document control system and on <a href="#">KML's website</a> available to the public members.				

## **APPENDIX D: MS968 STATEMENTS OF COMPLIANCE AND AUDIT TABLE**

## Statement of Compliance

### 1. Proposal and Proponent Details

Proposal Title	<i>Hinge Iron Ore Project</i>
Statement Number	<i>968</i>
Proponent Name	<i>Karara Mining Limited</i>
Proponent's Australian Company Number (where relevant)	ACN 070 871 831

### 2. Statement of Compliance Details

Reporting Period	<i>4/06/24 to 3/06/25</i>
------------------	---------------------------

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"/>



### 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"> <li>• in the reporting period addressed in this Statement of Compliance; and</li> <li>• as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.</li> </ul> (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.*

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

INITIALS:



#### 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:.....15/08/2025.....

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](mailto:compliance@dwer.wa.gov.au)

#### 7. Post Assessment Guidelines and Forms

Post assessment documents can be found at [www.epa.wa.gov.au](http://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: *[Signature]*

**ATTACHMENT 1****Table 1 Compliance Status Terms**

<b>Compliance Status Terms</b>	<b>Abbrev</b>	<b>Definition</b>	<b>Notes</b>
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"> <li>ongoing requirements that have been met during the reporting period; and</li> <li>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'.</li> </ul>
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"> <li>audit elements have a finite period of application (e.g. construction activities, development of a document);</li> <li>the action has been satisfactorily completed; and</li> <li>the DWER has provided written acceptance of 'completed' status for the audit element.</li> </ul>
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><b>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</b></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:





# 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 Implementation	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.	Overall	Ongoing	C	
				Evidence	<ul style="list-style-type: none"><li>No new vegetation clearing occurred during the reporting period within the area authorised by MS968. However, a brief mining operations occurred within the existing Hinge Pit with crushing and screening at the previous RoM Pad under Works Approval W6948/2024/1, granted by DWER on October 10, 2024.</li><li>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.</li><li>MS968 implemented in accordance with Table 2:<ul style="list-style-type: none"><li>Disturbance footprint within approved footprint (Total disturbance = 165.58ha. GIS check)</li><li>Mine disturbance envelope clearing to date of (148.22ha)</li><li>Haul road disturbance envelope clearing to date (17.4ha)</li></ul></li><li>A total of 29.57ha of FCTs (1-6, 10, 12 only) cleared to date.</li></ul>				
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.	Letter notifying OEPA of any change in proponent details.	Overall	Within 28 days of such change	C	
				Evidence	<ul style="list-style-type: none"><li>The Proponent details are consistent with the company details on the KML website (<a href="#">Karara Mining</a>).</li><li>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.</li></ul>				
968: M3.1	Time Limit for Proposal Implementation	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.	Commencement of project works.	Overall	Approval void 4 June 2019 if project not substantially commenced	CLD	
				Evidence	Construction commenced in June 2014 with active mining operations commencing in October 2014. Audited as compliant in previous audit period, no further action is required.				
968: M3.2	Time Limit for Proposal Implementation	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 Statement.	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.	Construction	Provide letter to OEPA on or before 4 June 2019	CLD	
				Evidence	Audited as compliant in previous audit period, no further action is required.				
968:M4.1	Compliance Reporting	The proponent shall prepare and maintain a compliance assessment plan 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"><li>The preparation of a CAP.</li><li>Advice from OEPA advising that the CAP is satisfactory.</li></ul>	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"><li>Correspondence received from OEPA (dated 21/08/2014) stating CAP submitted with letter dated 11/07/2014, meets the requirements of Condition 4-2.</li><li>The latest version of CAP for HIOP (Revision 2, dated 16/06/2020) sighted.</li><li>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.</li><li>Letter received from DWER 30/07/2020 advising that the revised CAPs meet the requirements of Condition 4-1 of the Ministerial Statement – sighted.</li></ul>				
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	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	
				Evidence	<ul style="list-style-type: none"><li>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.</li><li>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.</li><li>Letter received from DWER 30/07/2020 advising that the revised CAPs meet the requirements of Condition 4-1 of the Ministerial Statement – sighted.</li></ul>				
968:4.2 (1-6)	Compliance Reporting	The Compliance Assessment Plan shall indicate: <div><div>(1) the frequency of compliance reporting;</div><div>(2) the approach and timing of compliance assessments;</div><div>(3) the retention of compliance assessments;</div><div>(4) the method of reporting of potential non-compliances and corrective actions taken;</div><div>(5) the table of contents of compliance assessment reports; and</div><div>(6) public availability of compliance assessment reports.</div></div>	The CAP shall indicate the: <div><div>1) Frequency of compliance reporting;</div><div>2) Approach and timing of compliance assessments;</div><div>3) Retention of compliance assessments;</div><div>4) Method of reporting of potential non-compliances and corrective actions taken;</div><div>5) Table of contents of compliance assessment reports; and</div><div>6) Public availability of ACAR.</div></div>	CAP req.	<div><div>1) Content within the CAP.</div><div>2) The CAP shall indicate the approach and timing of compliance assessments.</div><div>3) The CAP shall indicate the retention of compliance assessments.</div><div>4) The CAP shall indicate the method of reporting of potential non-compliances and corrective actions taken.</div><div>5) The CAP shall indicate the table of contents of compliance assessment reports.</div><div>6) The CAP shall indicate public availability of the ACARs.</div></div>	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	
				Evidence	<div>The latest HIOP CAP (CORP-EN-PLN-1036 Rev 2 dated 16/06/2020) content includes:<ul style="list-style-type: none"><li>Compliance assessment approach and frequency (refer to Section 3 of the CAP).</li><li>Retention of compliance assessments (refer to Section 5 of the CAP).</li><li>Method of reporting of potential non-compliances and corrective actions taken (refer to Section 4 and Appendix 2 of the CAP).</li><li>The CAP includes a general table of contents and table of contents of compliance assessment reports (refer to Appendix 3 of the CAP).</li><li>Public availability of ACAR (refer to Section 7 of the CAP).</li></ul></div>				
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.	Overall	With the first ACAR due 4 September 2015 and annually thereafter	C	
				Evidence	2024/25 ACAR included assessment of compliance (Appendix D: MS968 Statement of Compliance and Audit Table)				
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.	Overall	Ongoing	C	
				Evidence	2023/24 ACAR is available within KML’s Document Management System and on KML’s Intranet – sighted.				





# AUDIT TABLE

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

Audit Code	Subject	Requirement	How	Evidence		Phase	When	Status MS968	Further information
968:M4-5	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"> <li>Letter to OEPA advising of non-compliances.</li> <li>Non-compliance reports and correspondence between OEPA and KML on non-compliance</li> </ul>	Overall	Within seven days of the non-compliance being verified by KML	C	
				Evidence	A review of INX InControl incident records found that no non-compliances against Statement conditions were reported during the reporting period, and there are no incidents currently under investigation that may potentially non-compliant with Statement conditions.				
968:M4-6	Compliance Reporting	The proponent shall submit to the CEO the first compliance assessment report 15 months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first compliance assessment report.	Compliance assessments conducted annually	CAP req.	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	2023/24 ACAR submitted to the OEPA on the 30/08/2024.				
968:M4-6(1)	Compliance Reporting	The compliance assessment report shall 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.	Compilation of associated ACAR that are endorsed by KML CEO.	Overall	With the first ACAR due 4 September 2015 and annually thereafter	C	
				Evidence	2023/24 ACAR was endorsed by the delegate of KML's CEO.				
968:M4-6(2)	Compliance Reporting	The compliance assessment report shall include a statement as to whether the proponent has complied with the conditions.	ACAR submitted to OEPA	CAP req.	ACAR submitted to OEPA reports compliance with the Statement conditions.	Overall	With the first ACAR due 4 September 2015 and annually thereafter	C	
				Evidence	2023/24 ACAR for previous reporting period details KMLs adherence to conditions in Section 5 and Appendix D.				
968:M4-6(3)	Compliance Reporting	The compliance assessment report shall identify all potential non-compliances and describe corrective and preventative actions taken.	ACAR submitted to OEPA	CAP req.	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	2023/24 ACAR 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	The compliance assessment report shall be made publicly available in accordance with the approved compliance assessment plan.	Make reports publicly available in accordance with PAG4 – Post Assessment Guideline for Making information publicly available (EPA 2012d)	CAP req.	The ACAR will be made available to stakeholders, including members of the public, upon request and within 7 days of KML receiving the request.	Overall	Within seven days of KML receiving the request	C	
				Evidence	2023/24 ACAR is available within KML's Document Management System and on <a href="#">KML's website</a> , which is available to public members - sighted.				
968:M4-6(5)	Compliance Reporting	The compliance assessment report shall indicate any proposed changes to the CAP required by condition 4-1.	Completed ACAR indicating changes to the CAP	CAP req.	Completed ACAR 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"> <li>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.</li> <li>Letter received from DWER 30/07/2020 advising that the revised CAPs meet the requirements of Condition 4-1 of the Ministerial Statement – sighted.</li> <li>No updates to the current CAP (Revision 2, dated 16/06/2020) was proposed in the 2023/24 ACAR.</li> </ul>				
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 information publicly available (OEPA, 2012c)	CAP req.	<ul style="list-style-type: none"> <li>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.</li> <li>Where the information and/or document requested by stakeholders, including members of the public, is subject to an implementation condition that requires the 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</li> </ul>	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
					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.				
				Evidence	<ul style="list-style-type: none"><li>Data relating to environmental monitoring and management of dust, fauna, flora and land rehabilitation is presented in ACARs.</li><li>Data sighted as part of this audit was readily available.</li><li>No requests for provision of data were received during the audit period.</li></ul>				
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 publicly available	CAP req.	Letter to OEPA which request for approval from the CEO to not make data that contains particulars of a secret formula or process publicly available.	Overall	Within 7 days of the proponent receiving the request	C	
				Evidence	<ul style="list-style-type: none"><li>Data sighted as part of this audit was readily available.</li><li>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.</li></ul>				



# 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: 1. when implemented, substantiate whether condition 6-3 is being met. 2. 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 3. 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 1. 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	