



PERDAMAN
INDUSTRIES

CHEMICALS & FERTILISERS

2023-24 Compliance Assessment Report

Perdaman Urea Project

Burrup Peninsula, Western Australia



Proponent:

Perdaman Chemicals and Fertilisers Pty Ltd

ABN: 31 121 263 741

Date: 24 April 2024

Ministerial Statement No 1180



PERDAMAN
INDUSTRIES

CHEMICALS & FERTILISERS

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Document Information

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Approved By:



Name: Vikas Rambal

Job title: Chairman

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1 Introduction

This Compliance Assessment Report (CAR) has been prepared to document compliance with Ministerial Statement No. 1180 (MS 1180) issued for the implementation of the Perdaman Urea Project under the *Environmental Protection Act 1986* (EP Act). This CAR has been prepared in accordance with Condition 15 of MS 1180, as well as the Office of the Environmental Protection Authority (OEPA) post assessment guideline No. 3 – *Post Assessment Guideline for Preparing a Compliance Assessment Report* (OEPA 2012).

1.1 Project Background

Perdaman Fertilisers and Chemicals Pty Ltd (Perdaman) is the proponent for the Perdaman Urea Project (Project). The Project is to construct and operate a state-of-the-art urea plant with a production capacity of approximately 2 million tonnes per annum (Mtpa) on the Burrup Peninsula in the Northwest of Western Australia.

The Project infrastructure including the main production facility (urea plant), administration, maintenance and storage infrastructure, conveyor and port storage and shiploading facilities are situated within the Burrup Strategic Industrial Area (Burrup SIA) approximately 8 kilometers (km) from Dampier and 20km north-west of Karratha on the Burrup Peninsula. The Burrup SIA has established industrial facilities including Yara Pilbara Fertilisers and Nitrates plants and Woodside's Pluto LNG plant. The estate's proximity to gas, port and other key infrastructure makes it an ideal location for the project.

The Burrup SIA is located in close proximity to the Murujuga National Park which covers an area of 4,913 hectares (ha) on the Burrup Peninsula. The area is considered to host the largest concentration of ancient rock art in the world. As such, the project will apply effective management strategies that minimise or abate actual or potential impacts on the environment, heritage and cultural values of the region.

The Project involves piping natural gas from the nearby Woodside operated LNG facility to the project site under a long term commercial off-take agreement. Natural gas is converted to urea and the final granulated product is transported by conveyor to the Dampier Port by closed conveyor along the East West Service route, where new facilities will include an enclosed stockpile shed and ship loading facilities.

Following formal assessment of the Project (EPA and DoEE, 2021) the Project was granted approval to be implemented subject to conditions, under the EP Act on 24 January 2022 (MS 1180).

1.2 Purpose and Scope

This CAR documents compliance with conditions in MS 1180 for the period 24 January 2023 to 23 January 2024, in accordance with Conditions 15-3, 15-6 and 15-7 which state:

Condition 15-3

The proponent shall assess compliance with conditions in accordance with the Confirmed Compliance Assessment Plan.

Condition 15-6

The proponent shall submit to the CEO the first Compliance Assessment Report fifteen months from the date of issue of this Statement addressing the twelve-month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or at another time agreed in writing by the CEO.

Condition 15-7

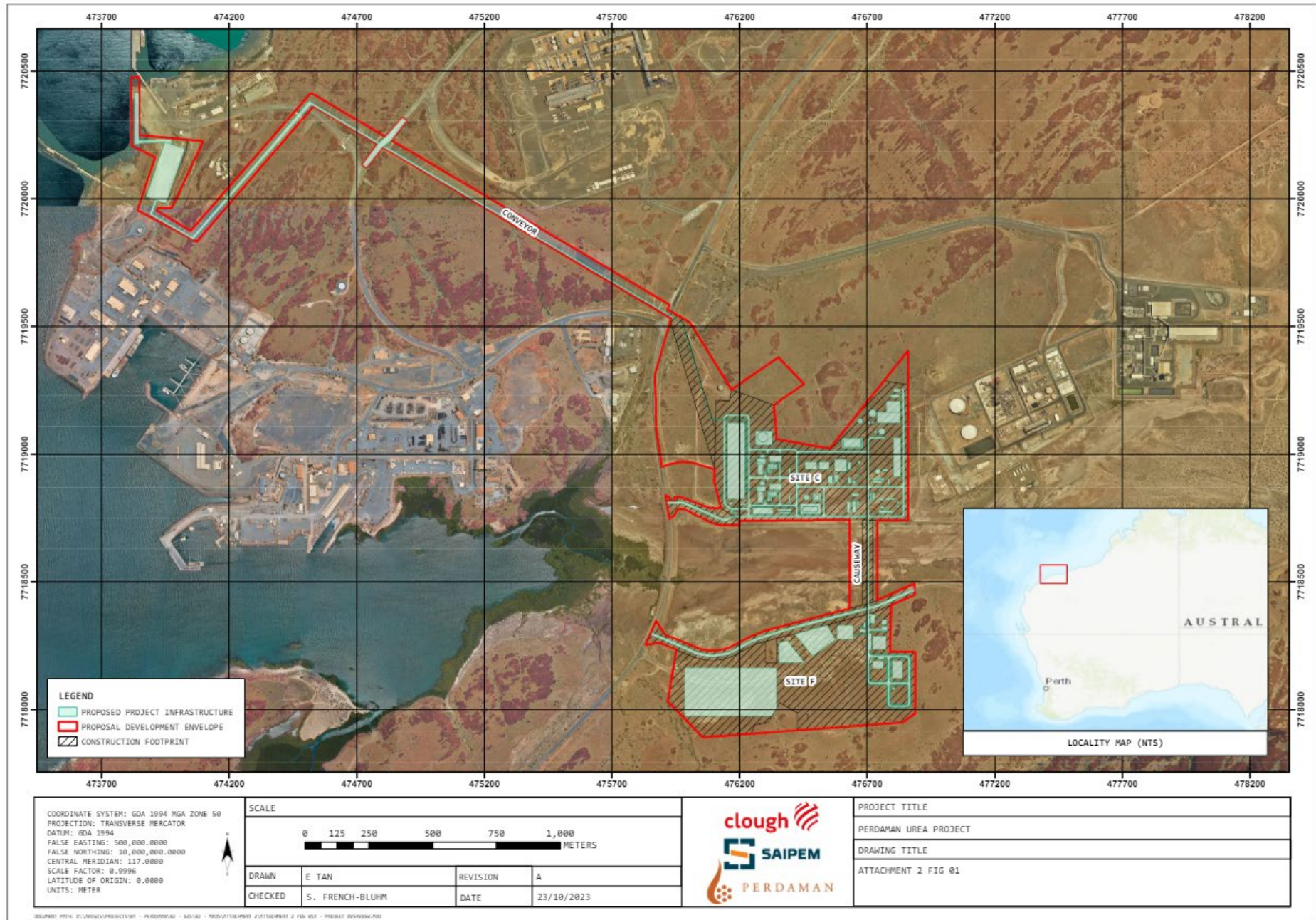
Each Compliance Assessment Report shall:

- 1. be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf;*
- 2. include a statement as to whether the proponent has complied with the conditions;*
- 3. identify all potential non-compliances and describe corrective and preventative actions taken;*
- 4. be made publicly available in accordance with the approved Compliance Assessment Plan; and*
- 5. indicate any proposed changes to the Compliance Assessment Plan required by condition 15-2.*

This CAR documents compliance with condition environmental outcomes and condition environmental objectives identified in MS 1180 and the Confirmed Environmental Management Plans.

1.3 Compliance Assessment Plan

This CAR has been developed in accordance with the Compliance Assessment Plan (CAP) (PCF-PD-EN-CAP) which was approved by the CEO on 17 March 2022.



2 Summary of the Proposal Implementation Status

The Proponent has commenced the implementation of the Proposal, however during the 2023 - 2024 reporting period, the proposal (under MS 1180) has not been implemented in full.

The Proposal is in the pre-construction phase with the removal of heritage artifacts, fauna trapping and translocation, vegetation clearing and grubbing, blasting and construction of temporary laydowns and the Burrup Road having been undertaken and/commenced during the reporting period.

Within the period 24 January 2023 to 23 January 2024, the following elements have commenced:

- **Physical elements of**
 - development envelopment within (Site C and F);
 - disturbance footprint within (Site C and F); and
 - Laydown Area within Site F.

Ground Disturbance commenced on 11 July 2023.

No Operational elements have commenced.

Air Quality Management

As the proposal is within the pre-construction phase, and greater than six months prior to the planned commencement of operations, no air quality management has occurred.

See Section 8 - Appendices B. Compliance Audit Table, Conditions 2-1 to 2-10, below, for further information.

Greenhouse Gas Management

As the proposal is within the pre-construction phase, and not within the time period between commencement of operations and the end of a period, no greenhouse gas management has occurred.

See Section 8 - Appendices B. Compliance Audit Table, Conditions 3-1 to 3-11, below, for further information.

Flora and Vegetation Management

Within the 2023-24 reporting period, the environmental outcome of flora and vegetation management had commenced.

See Section 4.3 Table 2 Status of Compliance of Confirmed Flora Management Plan and Section 8 - Appendices B. Compliance Audit Table, Conditions 4-1 to 4-9 below, for further information.

Terrestrial Fauna Management

Within the 2023-24 reporting period, the environmental outcome of Terrestrial Fauna management had commenced.

See Section 4.3 Table 2 Status of Compliance of Confirmed Flora Management Plan and Section 8 - Appendices B. Compliance Audit Table, Conditions 5-1 to 5-8 below, for further information.

Hydrogeological Management

Within the 2023-24 reporting period, hydrogeological management had not commenced.

See Section 8 - Appendices B. Compliance Audit Table, Conditions 6-1 to 6-10 below, for further information.

Acid Sulphate Soils Management

Within the 2023-24 reporting period, the environmental outcome of Acid Sulphate Soils management had commenced.

See Section 8 - Appendices B. Compliance Audit Table, Conditions 7-1 to 7-2 below, for further information.

Surface Water Management

Within the 2023-24 reporting period, the environmental outcome of surface water management had commenced.

See Section 4.3 1 Status of Compliance of Confirmed Surface Water Management Plan and Section 8 - Appendices B. Compliance Audit Table, Conditions 8-1 to 8-7 below, for further information.

Cultural Heritage Management

Within the 2023-24 reporting period, the environmental outcome of Cultural Heritage management had commenced.

See Section 4.3 2 Status of Compliance of Confirmed Cultural Heritage Management Plan and Section 8 - Appendices B. Compliance Audit Table, Conditions 9-1 to 9-8 below, for further information.

Light Management

Within the 2023-24 reporting period, the environmental outcome of Light management had commenced.

See Section 4.3 3 Status of Compliance of Confirmed Light Management Plan and Section 8 - Appendices B. Compliance Audit Table, Conditions 10-1 to 10-7 below, for further information.

Offsets

Offset contributions were made within the 2022-23 reporting period.

See Section 8 - Appendices B. Compliance Audit Table, Conditions 11-1 to 11-9 below, for further information.

Environmental Performance Report

Within the 2023-24 reporting period, the environmental outcome of Decommissioning and Rehabilitation had not commenced.

See Section 8 - Appendices B. Compliance Audit Table, Conditions 10-1 to 10-7 below, for further information.

Decommissioning and Rehabilitation

Within the 2023-24 reporting period, the environmental outcome of Decommissioning and Rehabilitation had not commenced.

See Section 8 - Appendices B. Compliance Audit Table, Conditions 10-1 to 10-7 below, for further information.

Time limit for proposal implementation

Perdaman is aware of the time limit for the proposal's implementation. The Ministerial Statement was granted on 24 January 2022, therefore Perdaman has until 23 January 2027 to implement the proposal.

See Section 8 - Appendices B. Compliance Audit Table, Conditions 14-1 to 14-2 below, for further information.

Compliance reporting

The Compliance Assessment Plan forms part of this document and the Compliance Assessment Report (CAR) is this document.

See Section 8 - Appendices B. Compliance Audit Table, Conditions 15-1 to 15-9 below, for further information.

Public availability of data

The public availability of data has been published.

See Section 8 - Appendices B. Compliance Audit Table, Conditions 16-1 to 16-2 below, for further information.

Management Plans

Seven Management Plans have been produced by Perdaman.

See 4.2 Confirmed Environmental Management Plans & Procedures, for further information.

3 Statement of Compliance

3.1 Proposal and Proponent Details

Proposal Title	<i>Perdaman Urea Project</i>
Statement Number	<i>1180</i>
Proponent Name	<i>Perdaman Chemicals and Fertilisers Pty Ltd</i>
Proponent's Australian Company Number <i>(where relevant)</i>	<i>121 263 741</i>

3.2 Statement of Compliance Details

Reporting Period	<i>24/01/23 to 23/01/24</i>
------------------	-----------------------------

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

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	Appendix B
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Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)			
No (please proceed to Section 3)	<input checked="" type="checkbox"/>	Yes (please proceed to Section 4)	<input type="checkbox"/>

3.3 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?	
Condition 15-6.	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Non-Compliant.	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
26 April 2023.	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Reported to DWER verbally Date _____ <input type="checkbox"/> Reported to DWER in writing Date _____	No
DWER notified Perdaman by Letter, that the CAR was due.	
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?	
First CAR was submitted to DWER (EPA) on 26 April 2023, 2 days overdue. There were no environmental impacts associated with this 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)	
Not Applicable.	
What was the cause(s) of the non-compliance or potential non-compliance?	
Due to discrepancies in the report being reviewed and finalised prior to submission. This caused a delay in the final submission of the CAR.	
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?	
During the next reporting period (January 2023- January 2024), the approach was to prepare the document earlier, with reviews scheduled for at least 7 days prior to the submission date and response dates clearly highlighted to the reviewer.	
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?	
Project Reporting Schedule. Amendments to reporting schedule to allow for reviews, feedback, further evidence collection and discrepancies. Collection of relevant evidence against conditions (data management) process being updated and implemented. Compliance Obligations being tracked in a compliance register / database.	
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:	
<ul style="list-style-type: none"> • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. 	

Each page (including Appendices) must be initialled by the person who signs Section 4 of this Statement of Compliance.

INITIALS:

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

Non-compliance/potential non-compliance 3-2

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
Condition 3-6.	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Non-compliant.	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
31 May 2022.	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Reported to DWER verbally Date _____ <input type="checkbox"/> Reported to DWER in writing Date _____	No
DWER notified Perdaman on 10 May 2023 that the GHGMP had not been published.	
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>The Proponent was to publish the GHGMP as required by condition 3-11 (2).</p> <p>Condition 3-6(4) requires the Confirmed GHGMP to be published in accordance with Condition 3-11(3).</p> <p>Condition 3-11(3) states the Confirmed GHGMP is to be published on the proponent's website within two weeks of receiving written confirmation from the CEO.</p> <p>The Plan was not published until the 10 May 2023, approximately 12 months overdue.</p> <p>There were no environmental impacts associated with the non-compliance.</p>	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
Not Applicable.	
What was the cause(s) of the non-compliance or potential non-compliance?	
Failure to publish GHMP due to administration error.	
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?	
Plan was published on the Proponents website.	
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?	
There were no measures in place prior to the non-compliance prior to it occurring. Obligations have been inputted into a compliance system (register) which tracks the requirements for each plan and conditions of the Ministerial Statement, including requirements for publishing dates.	
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:	
<ul style="list-style-type: none"> • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. 	

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INITIALS:

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

Non-compliance/potential non-compliance 3-3

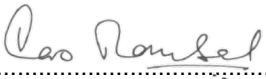
Which implementation condition or procedure was non-compliant or potentially non-compliant?	
Condition 3-11.	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Non-Compliant.	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
31 May 2022.	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Reported to DWER verbally Date _____ <input type="checkbox"/> Reported to DWER in writing Date _____	No
DWER notified Perdaman on 10 May 2023 that the GHGMP had not been published.	
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>The condition requires all reports required by the condition 3 are publicly available on the proponent's website within the timeframes specified below for the life of the proposal, or in any other manner or time specified by the CEO:</p> <p>(1) any Confirmed Greenhouse Gas Management Plan, within two weeks of receiving written confirmation from the CEO as referred to in condition 3-5;</p> <p>The Plan was not published until the 10 May 2023, approximately 12 months overdue.</p> <p>There were no environmental impacts associated with the non-compliance.</p>	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
Not Applicable.	
What was the cause(s) of the non-compliance or potential non-compliance?	
Failure to publish GHMP due to administration error.	
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?	
Plan was published on the Proponents website.	
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?	
There were no measures in place prior to the non-compliance prior to it occurring. Obligations have been inputted into a compliance system (register) which tracks the requirements for each plan and conditions of the Ministerial Statement, including requirements for publishing dates.	
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:	
<ul style="list-style-type: none"> • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. 	
(the above information may be provided as an attachment to this Statement of Compliance)	

3.4 Proponent Declaration

I, Vikas Rambal, (full name and position title)

declare that I am authorised on behalf of Perdaman Chemicals and Fertilisers Pty Ltd

(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:  Date: 24.04.2024

Please note that:

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

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

3.6 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

3.7 Post Assessment Guidelines and Forms

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

Each page (including Appendices) must be initialled by the person who signs Section 4 of this Statement of Compliance.

INITIALS: 


3.8 Compliance Status Terms

Compliance status terms are provided in Table 1.

Table 4 Terms of Compliance

Compliance Status Terms	Abbreviation	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	<p>This term applies to audit elements with:</p> <ul style="list-style-type: none"> Ongoing requirements that have been met during the reporting period; and Requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	<p>This term may only be used where:</p> <ul style="list-style-type: none"> Audit elements have a finite period of application (e.g. construction activities, development of a document); The action has been satisfactorily completed; and The DWER has provided written acceptance of a 'completed' status for the audit element.
Not Required at this Stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-Compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalised 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	<p>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</p> <p>The term 'In Process' may not be used to describe the compliance</p>

Each page (including Appendices) must be initialled by the person who signs Section 4 of this Statement of Compliance.

INITIALS: 

		<p>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>	<p>status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a I management plan).</p>
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3.9 Compliance Audit Table

The Compliance Audit Table is provided in Appendix B.

The audit table has been prepared and maintained in accordance with the OEPA's Post Assessment Guideline for Preparing an Audit Table (OEPA 2012b). The 'Status Column' of the audit table accurately describes the compliance status of each implementation condition for the reporting period of this Statement of Compliance (24 January 2023 to 23 January 2024). The terms that have been used in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 above.

4 Details of Declared Compliance Status

4.1 Summary of Compliance

Compliance with the Key Characteristics with the Proposal as defined in Condition 1 of the MS 1180 are provided in Appendix A.

Compliance with the conditions of MS 1180 is outlined in the audit table provided in Appendix B, in accordance with the Compliance Assessment Plan (PCF-PD-EN-CAP_PCF1) and DWER's Statement of Compliance.

In summary, there were three non-conformances with the conditions of MS 1180. Non-Compliance details for each non-compliance are provided in section 3.3.

4.2 Confirmed Environmental Management Plans & Procedures

The following nine Management Plans and Procedures required by MS 1180 have been approved by DWER (during the January 2022-January 2023 reporting period) and were being implemented during this reporting period (January 2023-January 2024):

- Condition 3-3: Greenhouse Gas Management Plan – Confirmed Greenhouse Gas Management Plan (PCF-PD-EN-GHGMP_PCF 5, 4 March 2022) (Saipem Clough Joint Venture, (SCJV, 2022).
- Condition 4-3: Flora and Vegetation - Confirmed Flora Management Plan (PCF-PD-EN-FMP_PCF 3, 21 February 2022) (Saipem Clough Joint Venture, (SCJV, 2022).
- Condition 5-3: Terrestrial Fauna Management - Confirmed Fauna Management Plan (PCF-PD-EN-FaMP_PCF 4, 12 May 2022) (Saipem Clough Joint Venture, (SCJV, 2022).
- Condition 5-3: Terrestrial Fauna Management - Confirmed Threatened Species Management Plan (PCF-PD-EN-TSMP_PCF5, 23 February 2022) (Saipem Clough Joint Venture, (SCJV, 2022).
- Condition 8-2: Surface Water – Confirmed Surface Water Management Plan (PCF-PD-EN-SWMP_PCF3, 9 May 2022) (Saipem Clough Joint Venture, (SCJV, 2022).
- Condition 9-2: Cultural Heritage – Confirmed Cultural Heritage Management Plan (PCF-PD-EN-CHMP_PCF6, 11 May 2022) (Saipem Clough Joint Venture, (SCJV, 2022).
- Condition 10-2: Light Management – Confirmed Light Management Plan (PCF-PD-EN-LMP_PCF2, 4 May 2022) (SCJV/Pendoley, 2022).
- Condition 11: Offsets – Confirmed Impact Reconciliation Procedure (PCF-PD-EN-IRP_Rev 1, 21 March 2022) (SCJV, 2022).
- Condition 15-1: Compliance Reporting – Compliance Assessment Plan (PCF-PD-EN-CAP_PCF1, 11 February 2022).

4.3 Status of Compliance with Confirmed Environmental Management Plans

There were six Management Plans that were approved by the CEO in the 2022-2023 Reporting Period (CAR, 2023) (refer to section 4.2 above), which were being implemented on the Proposal during the 2023-2024 reporting period. Please note the Greenhouse Gas Management Plan was not in effect as the Proposal was not in the Operational phase.

This section focuses on the implementation of the six outcome and / or objective based management plans required by the MS conditions, which are presented in Tables 2 through Table 7:

Refer to the Audit Table in Appendix B for details on Management Plan approval dates.

Two approved Management Plans are publicly available on the Perdaman Project Ceres Website <https://www.perdamanindustries.com.au/environment/> in accordance with condition 16 of the Ministerial Statement.

The implementation of the Confirmed Environmental Management Plans has been assessed for compliance in achieving the environmental outcomes and objectives of each plan, as well as compliance with the MS conditions. Tables 2 through Table 7 confirm the status of each management outcome or objective based environmental management plan being implemented during the Reporting Period.

Table 5 Status of Compliance of Confirmed Flora Management Plan


Condition Environmental Objective or Outcome Set in the Confirmed Management Plan	Reporting on the Outcomes and /or Objectives and management annually	Status
<p>Key Environmental Factor: Flora & Vegetation MS1180 Confirmed Management Plan: Flora Management Plan</p>		
<p>Condition environmental Outcome 4-1 (1): the extent of native vegetation clearing within the development envelope shall not exceed 73.05 ha;</p>	<p>The clearing of 57.08 ha of Native Vegetation within the development envelope occurred during the reporting period.</p> <p>The full extent of the allocated amount (73.05 ha) (Project Clearing) has not been exhausted in the period.</p> <p>The Project remains within the allowable clearing extent, with 15.97 ha still permitted to clear under this outcome.</p> <p>Trigger Criteria 1 and 4 were not exceeded during the reporting period.</p>	<p>Compliant.</p>
<p>Condition environmental Outcome 4-1 (2): the extent of clearing within the vegetation community identified as Priority 1 (P1) Priority Ecological Community (PEC) - Burrup Peninsula Rock Pile Communities shall not exceed 0.16 ha.</p>	<p>The clearing of 0.10 ha of the vegetation community identified as Priority 1 (P1) Priority Ecological Community (PEC) - Burrup Peninsula Rock Pile Communities has occurred during the reporting period.</p> <p>The full extent of the allocated amount (0.16 ha) (Project Clearing) has not been exhausted in the period.</p> <p>The Project remains within the allowable clearing extent, with 0.06 ha still permitted to clear under this outcome.</p> <p>Trigger Criteria 2, 3 and 4 were not exceeded during the reporting period.</p>	<p>Compliant.</p>
<p>Condition environmental Objective 4-2 (1): all direct impacts (other than the direct impacts authorised under condition 4-1) are avoided and minimise indirect impacts to native vegetation.</p>	<p>All direct impacts (other than those authorised under condition 4-1) were avoided and there were no indirect impacts to native vegetation.</p> <p>Achievement toward this environmental objective is managed through the Flora Management Plan Objective based provisions, which include the Management Actions and Targets for Flora. Achievement of the management actions and targets is monitored through various means, including environmental inspections, annual flora monitoring, incident reporting and GDP's.</p> <p>The following Management Actions / Targets of the Plan associated with achieving this objective have been met:</p> <ul style="list-style-type: none"> • MA1 / FVM 1 • MA2 / FVM 2 • MA3 / FVM 3 • MA4 / FVM 4 • MA5 / FVM 5 • MA6 / FVM 6 • MA7 / FVM 7 	<p>Compliant.</p>

	<ul style="list-style-type: none"> • MA8 / FVM 8 • MA9 / FVM 9 • MA10 / FVM 10 • MA13 / FVM 13 • MA14 / FVM 14 • MA15 / FVM 15 • MA16 • MA17 / FVM 17 <p>The following Management Actions / Targets of the Plan were not required or applicable during the reporting period:</p> <ul style="list-style-type: none"> • MA11 / FVM 11 • MA12 / FVM 12 • FVM 16
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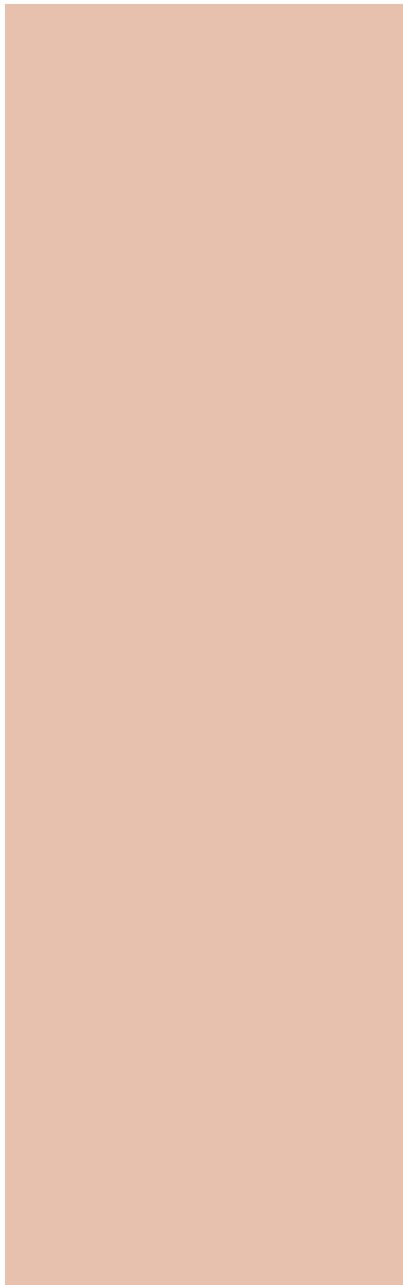
Table 6 Status of Compliance of Confirmed Fauna Management Plan

Condition Environmental Objective or Outcome Set in the Confirmed Management Plan	Reporting on the Outcomes and /or Objectives and management annually	Status
<p>Key Environmental Factor: Terrestrial Fauna MS1180</p> <p>Confirmed Management Plan: Fauna Management Plan</p>		
<p>Condition environmental Outcome 5-1 (1):</p> <p>clearing in the fauna habitat type identified as Rocky Outcrops shall not exceed 0.16 ha</p>	<p>The clearing of 0.10 ha of Rocky Outcrops has occurred during the reporting period.</p> <p>The full extent of the allocated amount (0.16 ha) (Project Clearing) has not been exhausted in the period.</p> <p>The Project remains within the allowable clearing extent, with 0.06 ha still permitted to clear under this outcome.</p> <p>Trigger Criterion 2 and Threshold Criterion 2 were not exceeded during the reporting period.</p>	Compliant.
<p>Condition environmental Outcome 5-1 (2):</p> <p>clearing in the fauna habitat type identified as Hummock Grasslands on Mid-slopes shall not exceed 49.17 ha</p>	<p>The clearing of 46.16 ha of Hummock Grasslands on the Mid-slopes occurred during the reporting period.</p> <p>The full extent of the allocated amount (0.16 ha) (Project Clearing) has not been exhausted in the period.</p> <p>The Project remains within the allowable clearing extent, with 3.01 ha still permitted to clear under this outcome.</p> <p>Trigger Criterion 3 was exceeded – (Actual clearing within Hummock Grasslands on mid-slopes habitat type exceeds 90 % (44.25 ha) of the approved clearing limit.)</p> <p>Threshold Criterion 3 was not exceeded in the Reporting Period.</p>	Compliant.
<p>Condition environmental Outcome 5-1 (3):</p> <p>clearing in the fauna habitat</p>	<p>The clearing of 11.50 ha of Sampire Shrublands / Supratidal flats has occurred during the reporting period.</p>	Compliant.

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INITIALS: 

<p>type identified as Samphire Shrublands / Supratidal flats shall not exceed 11.97 ha;</p>	<p>The full extent of the allocated amount (11.97 ha) (Project Clearing) has not been exhausted in the period.</p> <p>The Project remains within the allowable clearing extent, with 0.47 ha still permitted to clear under this outcome.</p> <p>Trigger Criterion 4 was exceeded – (Actual clearing of Samphire Shrublands / Supratidal flats habitat exceeds 90% (10.77 ha) of the approved clearing limit.)</p> <p>Threshold Criterion 4 was not exceeded in the Reporting Period.</p>	
<p>Condition environmental Outcome 5-1 (4):</p> <p>clearing in the fauna habitat type identified as Drainage Lines shall not exceed 2.7 ha;</p>	<p>The clearing of 2.41 ha of Drainage Lines has occurred during the reporting period.</p> <p>The full extent of the allocated amount (2.70 ha) (Project Clearing) has not been exhausted in the period.</p> <p>The Project remains within the allowable clearing extent, with 0.29 ha still permitted to clear under this outcome.</p> <p>Trigger Criterion 5 and Threshold Criterion 5 have not been exceeded during the Reporting Period.</p>	<p>Compliant.</p>
<p>Condition environmental Outcome 5-1 (5):</p> <p>impacts to short-range endemic fauna species are avoided, unless it is demonstrated, and the CEO confirms in writing that the species occurs in a self-sustaining population outside the development envelope.</p>	<p>Bennelongia conducted a SRE survey on behalf of the Proponent in 2022. 28 species of SRE groups were collected. Bennelongia concluded that based on the size of the Project area, what is known of the biology of the SRE Groups and the continuous connections of habitat inside the development envelope with similar habitat outside, it is likely that all species exist in self-sustaining populations outside the PDE. Therefore, it is unlikely that the Project development will have significant detrimental effect the conservation status of any species. With the exception of <i>Chernetidae</i>, which was identified within an area proposed for the laydown site within the PDE. However upon further sampling it was discovered that the species was found in minor drainage line that continued outside the PDE. In addition Bennelongia noted that the species could be assigned a species code of an intraspecific variation of this species which means it occurs outside of the development envelope.</p> <p>A Peer Review of the FaMP and the SRE Survey conducted by Bennelongia in 2022 was carried out by Invertebrate Solutions Pty Ltd on 6 May 2022.</p> <p>It was demonstrated to the CEO that the SRE populations were in a self-sustaining population outside the Development Envelope and would not be impacted by the proposed clearing extents under the MS 1180.</p>	<p>Not Required.</p>
<p>Condition environmental Objective 5-2 (1):</p> <p>minimise direct and indirect impacts to the northern quoll, Pilbara olive python and the ghost bat within the development envelope.</p>	<p>Direct and indirect impacts to the northern quoll, Pilbara olive python and the ghost bat within the development envelope have been minimised during the Reporting Period.</p> <p>Achievement toward this environmental objective is managed through the Fauna Management Plan Objective based provisions, which include the Management Actions and</p>	<p>Compliant.</p>



Targets for Terrestrial Fauna. Achievement of the management actions and targets is monitored through various means, including environmental inspections, monitoring provisions, incident reporting, training and GDP's.

The following Management Actions / Targets of the Plan associated with achieving this objective have been met during the reporting:

- MA1 / FaMP Target 1
- MA2 / FaMP Target 2
- MA3 / FaMP Target 3
- MA4 / FaMP Target 4
- MA5 / FaMP Target 5
- MA6 / FaMP Target 6
- MA6 / FaMP Target 7
- MA7 / FaMP Target 8
- MA8 / FaMP Target 9
- MA9 / FaMP Target 10
- MA10 / FaMP Target 11
- MA11 / FaMP Target 12
- MA13 / FaMP Target 14
- FaMP Target 15
- MA18 / FaMP Target 19
- MA19 / FaMP Target 20
- MA21 / FaMP Target 22
- MA22 / FaMP Target 23

The following Management Actions / Targets of the Plan were **not required or applicable** during the reporting period:

- MA 20 / FaMP Target 21
- MA12 / FaMP Target 13

Table 7 Status of Compliance of Confirmed Threatened Species Management Plan

Condition Environmental Objective or Outcome Set in the Confirmed Management Plan	Reporting on the Outcomes and /or Objectives and management annually	Status
Key Environmental Factor: Terrestrial Fauna MS1180		
Confirmed Management Plan: Threatened Species Management Plan		
Condition environmental Outcome 5-1 (1): clearing in the fauna habitat type identified as Rocky Outcrops shall not exceed 0.16 ha	The clearing of 0.10 ha of Rocky Outcrops has occurred during the reporting period. Project Clearing has not been completed in the period. The Project remains within the allowable clearing extent, with 0.06 ha still permitted to clear under this outcome.	Compliant.

<p>Condition environmental Outcome 5-1 (2):</p> <p>clearing in the fauna habitat type identified as Hummock Grasslands on Mid-slopes shall not exceed 49.17 ha</p>	<p>The clearing of 46.16 ha of Hummock Grasslands on the Mid-slopes has occurred during the reporting period.</p> <p>Project Clearing has not been completed in the period.</p> <p>The Project remains within the allowable clearing extent, with 3.01 ha still permitted to clear under this outcome.</p>	<p>Compliant.</p>
<p>Condition environmental Outcome 5-1 (3):</p> <p>clearing in the fauna habitat type identified as Samphire Shrublands / Supratidal flats shall not exceed 11.97 ha;</p>	<p>The clearing of 11.50 ha of Samphire Shrublands / Supratidal flats has occurred during the reporting period.</p> <p>Project Clearing has not been completed in the period.</p> <p>The Project remains within the allowable clearing extent, with 0.47 ha still permitted to clear under this outcome.</p>	<p>Compliant.</p>
<p>Condition environmental Outcome 5-1 (4):</p> <p>clearing in the fauna habitat type identified as Drainage Lines shall not exceed 2.7 ha;</p>	<p>The clearing of 2.41 ha of Drainage Lines has occurred during the reporting period.</p> <p>Project Clearing has not been completed in the period.</p> <p>The Project remains within the allowable clearing extent, with 0.29 ha still permitted to clear under this outcome.</p>	<p>Compliant.</p>
<p>Condition environmental Outcome 5-1 (5):</p> <p>impacts to short-range endemic fauna species are avoided, unless it is demonstrated, and the CEO confirms in writing that the species occurs in a self-sustaining population outside the development envelope.</p>	<p>Bennelongia conducted a SRE survey on behalf of the Proponent in 2022. 28 species of SRE groups were collected. Bennelongia concluded that based on the size of the Project area, what is known of the biology of the SRE Groups and the continuous connections of habitat inside the development envelope with similar habitat outside, it is likely that all species exist in self-sustaining populations outside the PDE. Therefore, it is unlikely that the Project development will have significant detrimental effect the conservation status of any species. With the exception of Chernetiidae, which was identified within an area proposed for the laydown site within the PDE. However, upon further sampling it was discovered that the species was found in minor drainage line that continued outside the PDE. In addition, Bennelongia noted that the species could be assigned a species code of an intraspecific variation of this species which means it occurs outside of the development envelope.</p> <p>A Peer Review of the FaMP and the SRE Survey conducted by Bennelongia in 2022 was carried out by Invertebrate Solutions Pty Ltd on 6 May 2022</p> <p>It was demonstrated to the CEO that the SRE populations were in a self-sustaining population outside the Development Envelope and would not be impacted by the proposed clearing extents under the MS 1180.</p>	<p>Not Required.</p>
<p>Condition environmental Objective 5-2 (1):</p> <p>minimise direct and indirect impacts to the northern quoll, Pilbara olive python and the</p>	<p>Direct and Indirect Impacts to the northern quoll, Pilbara olive python and the ghost bat within the development envelope have been minimised during the Reporting Period.</p> <p>Achievement toward this environmental</p>	<p>Compliant.</p>

ghost bat within the
development envelope.

objective is managed through the Threatened Species Management Plan Objective based provisions, which include the Management Actions and Targets for Threatened Species relevant to the Project. Achievement of the management actions and targets is monitored through various means, including environmental inspections, monitoring provisions, incident reporting and GDP's.

The following Management Actions of the Plan associated with achieving this objective **have been met** during the reporting:

- MA1
- MA2
- MA3
- MA4
- MA5
- MA6
- MA7
- MA9
- MA12
- MA13
- MA15
- MA16
- MA17
- MA18
- MA19
- MA20
- MA21
- MA26
- MA27
- MA28
- MA30
- MA31
- MA32
- MA33
- MA34
- MA36
- MA38
- MA39
- MA41
- MA42
- MA44
- MA47


The following Management Actions of the Plan were **not required or applicable** during the reporting period:

- MA8
- MA10
- MA11
- MA22
- MA40
- MA43
- MA46
- MA23
- MA24
- MA29

Table 8 Status of Compliance of Confirmed Surface Water Management Plan

Condition Objective/Outcome Set in the Confirmed Management Plan	Reporting on the Outcomes / Objectives and management annually	Status
<p>Key Environmental Factor: Inland Waters MS1180</p> <p>Confirmed Management Plan: Surface Water Management Plan</p>		
<p>Condition environmental Objective 8-1 (1) (set as an outcome in the SWMP): maintain the hydrological regimes and quality of surface water so that environmental values are protected.</p> <p>Condition environmental Objective 6-1 (1): Minimise project attributable impacts on groundwater quality, flow direction and/or depth to maintain the hydrological regimes and quality of groundwater and surface water so that environmental values are protected.</p>		
<p>Trigger Criterion 1 Presence of backwater or ponding of water from the edge of the development envelope over a period of two consecutive days from the date ponding was identified at distances further than 6 m.</p>	<p>No presence of backwater or ponding was identified during the site inspections. This criterion was not triggered.</p>	Compliant.
<p>Threshold Criterion 1 Presence of backwater or ponding of water from the edge of the development envelope over a period of two consecutive days from the date ponding was identified at distances further than 10 m.</p>	<p>No presence of backwater or ponding was identified during the site inspections. This Threshold criterion was not triggered.</p>	Compliant.
<p>Trigger Criterion 2: Exceedance of Surface Water quality trigger levels (refer to Table 1-4 in SWMP).</p>	<p>Quarterly surface water quality monitoring has not commenced during the reporting period.</p>	Not Required.
<p>Threshold Criterion 2: Exceedance of Surface Water quality threshold levels (refer to Table 1-4 in SWMP).</p>	<p>Quarterly surface water quality monitoring has not commenced during the reporting period.</p>	Not Required.
<p>Trigger Criterion 3 Groundwater quality trigger</p>	<p>Groundwater Quality monitoring results to date confirm that Criteria have not been triggered.</p>	Compliant.

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INITIALS: 

<p>criteria.</p>	<p>During the Reporting Period groundwater monitoring events were carried out quarterly in April 2023, July 2023 and October 2023.</p> <p>The January 2024 monitoring event did not occur due to the monitoring wells being damaged through the bulk earthwork activities. The project is completing an assessment of Site C to determine the locations for new wells due to the need to dewater in the next reporting period.</p>	
<p>Threshold Criterion 3 Groundwater quality threshold criteria.</p>	<p>Groundwater quality monitoring results to date (confirm that Threshold Criteria have not been triggered).</p> <p>During the Reporting Period groundwater monitoring events were carried out quarterly in April 2023, July 2023 and October 2023.</p> <p>The January 2024 monitoring event did not occur due to the monitoring wells being damaged through the bulk earthwork activities. The project is completing an assessment of Site C to determine the locations for new wells due to the need to dewater in the next reporting period.</p>	<p>Compliant.</p>
<p>Trigger Criterion 4 Continuous increasing trend and/or continuous decreasing trend in the Depth to groundwater (mBTC and mAHD).</p>	<p>Depth to groundwater measurements to date do not indicate a Continuous increasing trend and/or continuous decreasing trend.</p> <p>During the Reporting Period groundwater monitoring events were carried out quarterly in April 2023, July 2023 and October 2023.</p> <p>The January 2024 monitoring event did not occur due to the monitoring wells being damaged through the bulk earthwork activities. The project is completing an assessment of Site C to determine the locations for new wells due to the need to dewater in the next reporting period.</p>	<p>Compliant.</p>
<p>Threshold Criterion 4 Continuous increasing/decreasing trend of >12 months.</p>	<p>Depth to groundwater measurements to date do not indicate a Continuous increasing trend and/or continuous decreasing trend of > 12 months.</p> <p>During the Reporting Period groundwater monitoring events were carried out quarterly in April 2023, July 2023 and October 2023.</p> <p>The January 2024 monitoring event did not occur due to the monitoring wells being damaged through the bulk earthwork activities. The project is completing an assessment of Site C to determine the locations for new wells due to the need to dewater in the next reporting period.</p>	<p>Compliant.</p>
<p>Condition environmental Objective 8-1 (1): maintain the hydrological regimes and quality of surface water so that environmental values are protected.</p>	<p>All hydrological regimes and surface water quality have been maintained during the Reporting Period so that Environmental Values are protected.</p> <p>Achievement toward this environmental objective is managed through the Surface Water Management Plan Objective based provisions, which include the Management Actions and Targets for surface water values. Achievement of the management actions and targets is monitored through various means,</p>	<p>Compliant.</p>


	<p>including environmental inspections, surface water quality and groundwater monitoring provisions and incident reporting. Water monitoring occurs quarterly as per the SWMP. During the Reporting Period water monitoring events were carried out quarterly in April 2023, July 2023 and October 2023.</p> <p>The January 2024 monitoring event did not occur due to the monitoring wells being damaged through the bulk earthwork activities. The project is completing an assessment of Site C to determine the locations for new wells due to the need to dewater in the next reporting period.</p> <p>The following Management Actions / Targets of the Plan associated with achieving this objective have been met during the reporting:</p> <ul style="list-style-type: none"> • MA1 / SWMT 1 • MA2 / SWMT 2 • MA3 / SWMT 3 • MA4 / SWMT 4 • MA5 / SWMT 5 • MA6 / SWMT 6 • MA7 / SWMT 7 • MA9 / SWMT 9 • MA11 / SWMT 11 • MA12 / SWMT 12 • MA13 / SWMT 13 • MA14 / SWMT 14 • MA15 / SWMT 15 • MA16 / SWMT 16 • MA17 / SWMT 17 • MA18 / SWMT 18 • MA19 / SWMT 19 • MA20 / SWMT 20 <p>The following Management Actions / Targets of the Plan were not required or applicable during the reporting period:</p> <ul style="list-style-type: none"> • MA8 / SWMT 8 • MA10 / SWMT 10 • MA11 / SWMT 11 	
<p>Condition environmental Objective 6-1 (1):</p> <p>Minimise project attributable impacts on groundwater quality, flow direction and/or depth to maintain the hydrological regimes and quality of groundwater and surface water so that environmental values are protected.</p>	<p>Project attributable impacts on groundwater quality, flow direction and/or depth have been minimised to maintain the hydrological regimes and groundwater and surface water quality during the Reporting Period so that Environmental Values are protected.</p> <p>During the Reporting Period water monitoring events were carried out quarterly in April 2023, July 2023 and October 2023.</p> <p>The following Management Actions / Targets of the Plan associated with achieving this objective have been met during the reporting</p>	<p>Compliant.</p>

	<p>period:</p> <ul style="list-style-type: none"> MA4 / SWMT 4 <p>Refer above for the MA / SWMT that have been met for this Period.</p>
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Table 9 Status of Compliance of Confirmed Cultural Heritage Management Plan

Condition Objective Set in the Confirmed Management Plan	Reporting on the Objectives and Targets annually	Status
<p>Key Environmental Factor: Social Surroundings MS1180</p> <p>Confirmed Management Plan: Cultural Heritage Management Plan</p>		
<p>Condition environmental Objective 9-1 (1):</p> <p>avoid, where possible, and otherwise minimise direct and indirect impacts to social, cultural, heritage, and archaeological values within and surrounding the development envelope.</p>	<p>The following Management Actions and Targets of the Plan associated with achieving this objective have been met during the reporting period:</p> <ul style="list-style-type: none"> MA 1 / CHM TARGET 1 MA 2 / CHM TARGET 2 MA 4 / CHM TARGET 4 MA 5 / CHM TARGET 5 MA 6 / CHM TARGET 6 MA 7/ CHM TARGET 7 MA 8 / CHM TARGET 8 MA 11 / CHM TARGET 11 MA 14 / CHM TARGET 14 MA 15 / CHM TARGET 15 MA 16 / CHM TARGET 16 MA 19 / CHM TARGET 19 MA 20 MA 21 / CHM TARGET 21 MA 31 / CHM TARGET 31 <p>The following Management Actions and Targets of the Plan associated with achieving this objective have not been required, not started or are not applicable during the Reporting Period:</p> <ul style="list-style-type: none"> MA 3 / CHM TARGET 3 MA 10 / CHM TARGET 10 MA 12 / CHM TARGET 12 MA 13 / CHM TARGET 13 MA 17 / CHM TARGET 17 MA 18 / CHM TARGET 18 CHM TARGET 20 MA 22 / CHM TARGET 22 MA 23 / CHM TARGET 23 MA 24 / CHM TARGET 24 MA 25 / CHM TARGET 25 	<p>Compliant.</p>

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INITIALS: 

	<ul style="list-style-type: none"> MA 26 / CHM TARGET 26 MA 29 / CHM TARGET 29 MA 30 / CHM TARGET 30 	
<p>Condition environmental Objective 9-1 (2):</p> <p>allow ongoing Traditional Owner and Custodian access to enable traditional activities and connection to culturally significant areas within and surrounding the development envelope as shown in Figure 2;</p>	<p>The following Management Actions and Targets of the Plan associated with achieving this objective have been met during the reporting period:</p> <ul style="list-style-type: none"> MA 9 / CHM TARGET 9 	Compliant.
<p>Condition environmental Objective 9-1 (3):</p> <p>allow Traditional Owner and Custodian access to the development envelope following decommissioning of the proposal as shown in Figure 2;</p>	<p>The following Management Actions and Targets of the Plan associated with achieving this objective have not been applicable or required during the Reporting Period:</p> <ul style="list-style-type: none"> MA 28 / CHM TARGET 28 	Not Required.
<p>Condition environmental Objective 9-1 (4):</p> <p>avoid, where possible, and otherwise minimise direct and indirect impacts to visual and amenity impacts to social and cultural places and activities.</p>	<p>The following Management Actions and Targets of the Plan associated with achieving this objective have been met during the reporting period:</p> <ul style="list-style-type: none"> MA 27 / CHM TARGET 27 	Compliant.

Table 10 Status of Compliance of Confirmed Light Management Plan

Condition Environmental Objective Set in the Confirmed Management Plan	Reporting on the Objectives and management Targets annually	Status
<p>Key Environmental Factor: Social Surroundings MS1180</p> <p>Confirmed Management Plan: Light Management Plan</p>		
<p>Condition environmental Objective 10-1 (1):</p> <p>avoid, where possible, and otherwise use best practice technology and risk-based management actions to minimise nightglow and light overspill from the Project so that the environmental values of amenity at sensitive locations, including, but not limited to Hearson Cove and Deep Gorge, are protected</p>	<p>The following Management Actions and Targets of the Plan associated with achieving this objective have been met or continue to be met during the reporting period:</p> <ul style="list-style-type: none"> MA 1 / LMP TARGET 1 MA 2 / LMP TARGET 2 MA 3 / LMP TARGET 3 MA 5 / LMP TARGET 5 MA 6 / LMP TARGET 6 MA 7 / LMP TARGET 7 <p>The following Management Actions and Targets of the Plan associated with achieving this objective have not been required, not started or are not applicable during the Reporting Period:</p>	Compliant.

- MA 4 / LMP TARGET 4

5 Supporting / Verifying Information

A range of supporting/verifying information was utilised to prepare this CAR, including:

- Monitoring data, reports or letters
- Environmental Inspections
- Photographs
- Incident Reports
- Correspondence letters and communications.
- Maps and Spatial Data

Key pieces of valuable information for the assessment of the implementation of MS 1180 conditions are referenced in Appendix B and are provided separately in electronic format. A list of these is provided in Appendix C. It should be noted that further supporting evidence is documented and should it be required can be provided on request.

6 Other Information

The Proponent does not have any other information to provide in this CAR.

7 Changes to the CAP

No changes to the CAP were made during this reporting period.

8 Appendices

A. Appendix A - MS 1180 Compliance Table - Condition 1

Table 11 Appendix A - MS 1180 Compliance Table Condition 1

Proposal Element	Description	Status	Further Information
Physical Elements			
Development envelope (Site C & F)	Maximum extent or range of clearing 106.7 ha	C	There has been no change to the approved Development Envelope extent. Evidence Figure provided (Figure 01B) refer to Appendix C.
Disturbance footprint (Site C & F)	Maximum extent or range of clearing 73.05 ha. Avoiding Cultural Heritage Sites IDs 9439, 26008, 9296, and MAC 004.	C	Native Vegetation clearing within the development envelope is 57.08 Ha.
Laydown Area (Site F)	Maximum extent or range of clearing 6.8 ha (temporary and episodic use).	C	Maximum extent of clearing within Laydown Area (Site F) is 6.80 Ha.
Utility Block (Site C)	Power generation (installed Combined Cycle Gas Turbine - 100MW capacity and installed solar - 3.5MW capacity).	NR	Operations to commence approximately 5 years after commencement of GDA.
Operational Elements			
Urea Production Plant	6,200 t/day	NR	Operations to commence approximately 5 years after commencement of GDA.
Ammonia Plant	3,500 t/day	NR	Operations to commence approximately 5 years after commencement of GDA.
Saline water discharge	20GL/yr. (including excess treated wastewater) discharged into the existing Water Corporation Multi-User Brine Return Line.	NR	Operations to commence approximately 5 years after commencement of GDA.
Product storage areas	Urea (plant site): 75, 000 t capacity, fully enclosed shed. Urea (Dampier Port site): 75, 000 t capacity, fully enclosed shed.	NR	Operations to commence approximately 5 years after commencement of GDA.
Urea shiploading system	Loading capacity of 2,200 t/h	NR	Operations to commence approximately 5 years after commencement of GDA.

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INITIALS:

Causeway	Culvert outflow velocities of less than 1.0 m/s	NR	Causeway construction to commence TBA.
Timing Elements			
Project life	Up to 80 years from the date of MS 1180.	NR	2103

Compliance Status: C = Compliant, CLD = Completed, NC = Non – compliant, NR = Not Required at this stage.



B. Appendix B - Compliance Audit Table

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 DWER; DAWE = Commonwealth Department of Water and the Environment; DBCA = Department of Biodiversity, Conservation and Attractions; DPLH = Department of Planning, Lands and Heritage; DMIRS = Department of Mining, Industry Regulation and Safety; DWER = Department of Water and Environmental Regulation; EPA = Environmental Protection Authority; DoH = Department of Health; Minister for Env = Minister for the Environment.
- 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	Timeframe	Status	Further Information												
1180: M1	Limitations and extent of proposal	<p>When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents or ranges:</p> <table border="1"> <thead> <tr> <th>Proposal element</th> <th>Location</th> <th>Maximum extent or range</th> </tr> </thead> <tbody> <tr> <td colspan="3">Physical elements</td> </tr> <tr> <td>Development envelope (Site C and F)</td> <td>Figures 1, 2, 3 & 4</td> <td>106.7 ha</td> </tr> <tr> <td>Disturbance footprint</td> <td>Figures 1, 2, 3 & 4</td> <td>73.05 ha. Avoiding Cultural Heritage Sites IDs</td> </tr> </tbody> </table>	Proposal element	Location	Maximum extent or range	Physical elements			Development envelope (Site C and F)	Figures 1, 2, 3 & 4	106.7 ha	Disturbance footprint	Figures 1, 2, 3 & 4	73.05 ha. Avoiding Cultural Heritage Sites IDs	<p>Physical extents - Through implementation of Ground Disturbance Permit Procedure (45826-HSE-PL-G-1024_GDP).</p> <p>See Appendix B – Compliance Assessment with Condition 1 in CAP.</p> <p>Fill out the Table 6-1 (Appendix B Template) in CAP and provide compliance status of each element extent and or limit (Key Characteristics of the Proposal) and any further information required to explain compliance.</p>	Compliance Assessment Report (Appendix B).	Overall	For life of the Project.	C	<p>Refer to Appendix A.</p> <p>Figure 01B Project Environmental Approval Boundaries.</p> <p>Ground Disturbance Permit Register (45826-HSE-REG-G-1001_GDP) Clearing data (PUP2024-002).</p>
Proposal element	Location	Maximum extent or range																		
Physical elements																				
Development envelope (Site C and F)	Figures 1, 2, 3 & 4	106.7 ha																		
Disturbance footprint	Figures 1, 2, 3 & 4	73.05 ha. Avoiding Cultural Heritage Sites IDs																		



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(Site C and F)		9439, 26008, 9296, and MAC 004.				
		Laydown Area (Site F)	Figure 2	6.8 ha (temporary and episodic use).				
		Utility Block (Site C)		Power generation (installed Combined Cycle Gas Turbine – 100 MW capacity and installed solar – 3.5 MW capacity).				
		Operational elements						
		Urea production plant	Figure 2	6,200 t/day				
		Ammonia plant	Figure 2	3,500 t/day				
		Saline water discharge		20 GL/yr. (including excess treated wastewater) discharged into the existing Water Corporation Multi-User Brine Return Line.				
		Product storage areas	Figure 2	Urea (plant site): 75,000 t capacity,				



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information															
		<table border="1"> <tr> <td></td> <td></td> <td>fully enclosed shed. Urea (Dampier Port site): 75,000 t capacity, fully enclosed shed.</td> </tr> <tr> <td>Urea shiploading system</td> <td>Figure 2</td> <td>Loading capacity of 2,200 t/h</td> </tr> <tr> <td>Causeway</td> <td>Figure 2</td> <td>Culvert outflow velocities of less than 1.0 m/s</td> </tr> <tr> <td colspan="3">Timing elements</td> </tr> <tr> <td>Project life</td> <td></td> <td>Up to 80 years from date of this Statement</td> </tr> </table>			fully enclosed shed. Urea (Dampier Port site): 75,000 t capacity, fully enclosed shed.	Urea shiploading system	Figure 2	Loading capacity of 2,200 t/h	Causeway	Figure 2	Culvert outflow velocities of less than 1.0 m/s	Timing elements			Project life		Up to 80 years from date of this Statement						
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Timing elements																							
Project life		Up to 80 years from date of this Statement																					
Air Quality Management																							
1180: M2.1	Air quality management	The proponent shall ensure that implementation of the proposal achieves the following environmental outcome: (1) ensure that no air emissions from the proposal have an adverse impact accelerating the weathering of rock art within Murujuga beyond natural rates.	Implement proposal pursuant to condition 2-1 of MS 1180.	CAR	Operations		NR	As the Proposal has not commenced Operations, this condition is not required at this stage.															
1180: M2.2	Air quality management	If: (1) the Minister notifies the proponent, for the purposes of this condition, of one or more air quality standards (including standards derived from the results of the Murujuga Rock Art Monitoring Program); and	Comply with air quality standards including standards derived from the Murujuga Rock Art Monitoring Program, and any amendments to those standards.	CAR	Operations	When / If the Minister notifies the Proponent.	NR	As the Proposal has not commenced Operations, this condition is not required at this stage															



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(2) the proponent complies with all those standards, and any amendments to the standards which are the subject of a notification to the proponent by the Minister for the purposes of this condition, the proponent is taken to have achieved the outcome specified in condition 2-1.						
1180: M2.3	Air quality management	<p>Not more than six months prior to the planned Commencement of Operations, or such greater time approved in writing by the CEO, the proponent shall submit to the CEO and the DAWE a revised version of the Perdaman Urea Project Environmental Management Plan Air Quality (Final Version PCF 2, 25 March 2021) (Air Quality Management Plan), which is prepared in consultation with the Murujuga Aboriginal Corporation and shall:</p> <p>(1) set out measures that will be taken to achieve each of the following outcomes and objectives:</p> <p>(a)subject to condition 2-2, compliance with the environmental outcome in condition 2-1(1), specifically that no air emissions from the proposal have an adverse impact accelerating the weathering of rock art within Murujuga beyond natural rates;</p> <p>(b)compliance with all air quality objectives and standards (including those derived from the results of the Murujuga Rock Art Monitoring Program), and any amendments to those objectives and standards, which are the subject of a notification to the proponent by the Minister for the purposes of condition 2-2 and/or condition 2-7(3); and</p>	<p>Update the AQMP to address all requirements of Condition 2-3 and resubmit the Air Quality Management Plan to the CEO and the DAWE.</p> <p>The Proponent is to prepare and submit for approval by the CEO EPA an Air Quality Management Plan not more than 6 months prior to the planned commencement of operations.</p> <p>The AQMP is to include all elements as specified in Condition 2-3.</p> <p>Submit the Confirmed AQMP to DCCEE within 10 days of approval by CEO EPA (EPBC Approval Condition 6).</p>	Submission of revised AQMP to the CEO.	Pre-Operations	Not more than six months prior to the planned Commencement of Operations , or such greater time approved in writing by the CEO	NR	<p>As the Proposal has not commenced Operations, this condition is not required at this stage</p> <p>Submission of the revised version of the Perdaman Urea Project Environmental Management Plan Air Quality (Final Version PCF 2, 25 March 2021) (Air Quality Management Plan), not required until 6 months prior to Operations commencing.</p>



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		<p>(c) seek to maintain regional air quality in accordance with the National Environment Protection (Ambient Air Quality) Measure by the minimisation of air emissions from the proposal.</p> <p>(2) be informed by monitoring data collected before Commencement of Operations which establishes a scientifically valid and robust baseline (the methodology for which has been subject to a peer review by an independent person or independent persons with suitable technical experience on the suitability of the methodology used to gather the baseline data) that is sufficient to measure whether the environmental outcome specified in condition 2-1(1) and the environmental outcomes and objectives specified in condition 2-3(1) have been achieved;</p> <p>(3) specify all of the expected air emissions from the proposal and their sources based on the air pollution control technology selection and plant design for the proposal at the time operations are proposed to commence and at the time of any review of the plan;</p> <p>(4) include a comparison of the expected air emissions for the proposal against international industry best practice for urea production facilities at the time operations are proposed to commence (or at the time of any future review of the plan);</p> <p>(5) include a comparison of the air pollution control technology selection and plant design for the proposal against international industry best practice for</p>						



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>urea production facilities at the time operations are proposed to commence (or at the time of any future review of the plan);</p> <p>(6) identify and describe the measures that the proponent will implement to minimise all air emissions, including the adoption of advances in air pollution control technology and process management since the date of this Statement (or since the date of the last plan review), to ensure that these are consistent with international industry best practice at the time of plan commencement or review, and specify:</p> <p>(a) the timeframe within which each measure will be implemented; and</p> <p>(b) the method to determine the effectiveness of each measure in minimising air emissions;</p> <p>(7) include provisions for monitoring and reporting to the CEO at least annually of:</p> <p>(a) all air emissions produced by the proposal;</p> <p>(b) on-site meteorological conditions including wind speed / direction, temperature, and rainfall rate;</p> <p>(c) ambient ground level concentrations for air emissions that have the potential to impact on human health, amenity, and rock art;</p> <p>(d) the implementation of measures required to be included in the Air Quality Management Plan by conditions 2-3(1)-(13); and</p> <p>(e) any exceedance of trigger criteria and threshold criteria;</p>						



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>(8) include provisions requiring the Air Quality Management Plan to be amended in any future reviews to incorporate updated management actions;</p> <p>(9) include a trajectory of proposed air emission reductions for the life of the proposal;</p> <p>(10) specify scientifically valid and robust:</p> <p>(a) trigger criteria that will trigger the implementation of management and/or contingency actions (including changes to operations and reductions in emissions) to prevent non-compliance with the Air Quality Management Plan and to ensure that the outcome in condition 2-1 and outcomes and objectives in condition 2-3(1) will be achieved;</p> <p>(b) threshold criteria that will demonstrate that the outcome in condition 2-1(1) and outcome and objectives in condition 2-3(1) are being achieved;</p> <p>(c) Adaptive monitoring program to determine if trigger criteria and threshold criteria have been met;</p> <p>(d) management and/or contingency actions (including changes to operations and reductions in emissions) to be implemented if the trigger criteria required by condition 2-3(10)(a) and/or the threshold criteria required by condition 2-3(10)(b) are exceeded;</p> <p>(11) include a report of a peer review carried out by an independent person or independent persons with suitable technical experience to review the final draft of the Air Quality Management Plan before it is submitted to the CEO as it relates to each of the items in condition 2-</p>						



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		3(10) and to report on the adequacy of that content to achieving the outcome in condition 2-1(1) and outcome and objectives in condition 2-3(1); (12) provide the format and timing for the reporting to the CEO of monitoring results against trigger criteria and threshold criteria over the reporting period in the Compliance Assessment Report required by condition 15-6; and (13) subject to the peer reviews identified in conditions 2-3(2) and 2-3(11), set out reasons for selection or adoption of the measures, criteria, monitoring program and management and/or contingency actions included in the Air Quality Management Plan, including discussion of other options considered.						
1180: M2.4	Air quality management	The proponent must not undertake the Commencement of Operations until the CEO has confirmed in writing that the Air Quality Management Plan submitted under condition 2-3 addresses the requirements of condition 2-3.	Provide evidence to the CEO to demonstrate the AQMP addresses requirements of condition 2-3 of MS1705. Correspondence in writing from the CEO that AQMP meets requirements of condition 2-3.	Correspondence with DWER (approval of AQMP from CEO) advising that the AQMP satisfies Condition 2-3.	Pre-Operations	Not more than six months prior to the planned Commencement of Operations , or such greater time approved in writing by the CEO	NR	As the Proposal has not commenced Operations, this condition is not required at this stage
1180: M2.5	Air quality management	The proponent shall implement the most recent version of the Confirmed Air Quality Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcome in condition 2-1(1) and outcome and objectives detailed in condition 2-3(1) have been met.	Implementation of the most recent version of the Confirmed AQMP. Written Correspondence with CEO and DWER.	CAR Written correspondence from CEO advising that condition 2-1(1) and outcomes and objectives detailed in condition 2-3 (1)	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the condition 2-	NR	As the Proposal has not commenced Operations, this condition is not required at this stage



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
				have been met.		1(1) and outcome and objectives detailed in condition 2-3(1) have been met.		
1180: M2.6	Air quality management	In the event that monitoring or investigations at any time indicate an exceedance of trigger criteria or threshold criteria specified in the Confirmed Air Quality Management Plan, the proponent shall: (1) report the exceedance in writing to the CEO within: (a) 48 hours of an exceedance of threshold criteria being identified; or (b) 7 days of an exceedance of trigger criteria being identified. (2) implement the management and/or contingency actions required by the Confirmed Air Quality Management Plan within seven days of the exceedances being reported or such lesser time specified in the Confirmed Air Quality Management Plan, and continue implementation of those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the trigger criteria and/or threshold criteria are being met and implementation of the management and/or contingency actions are no longer required; (3) investigate to determine the cause of the trigger criteria or threshold criteria being exceeded; (4) if threshold criteria have been exceeded, investigate to provide	Written Correspondence to the CEO within the required timeframes. a) 48 hours of an exceedance of threshold criteria being identified; or b) 7 days of an exceedance of trigger criteria being identified Correspondence to include:	Letter to CEO reporting the exceedance. Letter from CEO confirming implementation of the management and/or contingency actions are no longer required.	Overall	Report the exceedance in writing to the CEO within: (a) 48 hours of an exceedance of threshold criteria being identified; or (b) 7 days of an exceedance of trigger criteria being identified	NR	As the Proposal has not commenced Operations, this condition is not required at this stage.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded;</p> <p>(5) provide a further report to the CEO within 21 days of the exceedance being reported which shall include:</p> <p>(a) details of management and/or contingency actions implemented;</p> <p>(b) the effectiveness of the management and/or contingency actions implemented against the trigger criteria or threshold criteria;</p> <p>(c) the findings of the investigations required by conditions 2-5(3) and 2-5(4);</p> <p>(d) measures to prevent the trigger criteria or threshold criteria being exceeded in the future;</p> <p>(e) measures to prevent, control or abate impacts which may have occurred; and</p> <p>(f) justification for the trigger criteria or threshold criteria remaining, or being adjusted based on better understanding, demonstrating that the outcomes in condition 2-1(1) and outcomes and objectives in condition 2-3(1) will be met.</p>	<ul style="list-style-type: none"> Justifications if trigger and/or threshold values remain the same. <p>Written correspondence from CEO that it has been demonstrated that trigger criteria and/or threshold criteria are being met and implementation of the management and/or contingency actions are no longer required.</p>					
1180: M2.7	Air quality management	<p>Without limiting condition 2-5 (implementation of the plan), and notwithstanding compliance with condition 2-6 (response to exceedance), the proponent must not cause or allow:</p> <p>(1) an exceedance of a threshold criteria specified in a Confirmed Air Quality Management Plan (regardless of whether management actions and/or threshold contingency actions have been or are being implemented);</p>	<p>Implement proposal to uphold threshold and trigger values pursuant to AQMP and MRAS requirements.</p> <p>Report contingency/management actions, preventative measures and justifications if trigger and/or threshold values are exceeded.</p>	AQMP Exceedance Reports CAR	Overall	Operational phase.	NR	As the Proposal has not commenced Operations, this condition is not required at this stage.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(2) any non-compliance with the requirements of a Confirmed Air Quality Management Plan; or (3) any non-compliance with any air quality objectives and standards (including those derived from the results of the Murujuga Rock Art Monitoring Program), and any amendments to those objectives and standards, which are the subject of a notification to the proponent by the Minister for the purposes of this condition.						
1180: M2.8	Air quality management	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review, and submit proposed amendments to, the Confirmed Air Quality Management Plan to the CEO and the DAWE; and (2) shall review, and submit proposed amendments to, the Confirmed Air Quality Management Plan to the CEO and the DAWE as and when directed by the CEO; (3) shall review and submit proposed amendments to the Confirmed Air Quality Management Plan to the CEO and the DAWE within six months of being notified by the Minister of air quality standards or objectives (including those derived from the results of the Murujuga Rock Art Monitoring Program) or any amendments to those objectives or standards, for the purposes of condition 2-2 or condition 2-7(3); (4) shall review and submit proposed amendments to the Confirmed Air Quality Management Plan to the CEO and the DAWE at least every five years.	Revise, update and resubmit the AQMP to the CEO and DAWE with any proposed amendments. If the CEO and the DAWE request, revise, update and resubmit the AQMP to the CEO and DAWE with any proposed amendments. Revise, update and resubmit the AQMP to the CEO and DAWE within six months of being notified by the Minister of air quality standards or objectives (including those derived from the results of the Murujuga Rock Art Monitoring Program) or any amendments to those objectives or standards, for the purposes of condition 2-2 or condition 2-7(3). Revise and resubmit the AQMP to CEO and DAWE every 5 years (at least).	Submission of the revised AQMP to CEO and the DAWE. Written confirmation that revised AQMP has been approved by CEO and DAWE. Consultation with MAC written evidence.	Overall	When directed by the CEO; within 6 months of being notified by the Minister of air quality objectives or any amendments to those objectives; review and amend (where required) the confirmed AQMP at least every 5 years.	NR	As the Proposal has not commenced Operations, this condition is not required at this stage.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
			Any revisions will be consulted with MAC.					
1180: M2.9	Air quality management	Any changes to the Confirmed Air Quality Management Plan under condition 2-8 that involves an item that was subject to a peer review under conditions 2-3(2) or 2-3(11) will require a new peer review unless otherwise advised by the CEO.	Engage independent persons with suitable technical experience to conduct peer review of AQMP under conditions 2-3(2) or 2-3(11).	Correspondence with independent persons conducting the review. Peer review report and findings.	Overall	Operational phase.	NR	As the Proposal has not commenced Operations, this condition is not required at this stage. No changes to the Air Quality Management Plan under condition 2-8.
1180: M2.10	Air quality management	The proponent shall interpret and report on monitoring data collected for the purposes of the Confirmed Air Quality Management Plan to the CEO and the Murujuga Aboriginal Corporation at least annually.	Prepare a written report with all Air Quality monitoring data that has been collected along with associated interpretation of results for the CEO and MAC.	Air Quality Monitoring Factual and Interpretive Report.	Overall	At least annually for the life of the Project.	NR	As the Proposal has not commenced Operations, this condition is not required at this stage.
Greenhouse Gas Management								
1180: M3.1	Greenhouse gas management plan	Subject to condition 3-2, the proponent shall take measures to ensure that Net GHG Emissions do not exceed: (1)3,250,000 tonnes of CO2-e for the period until 30 June 2029; (2)2,600,000 tonnes of CO2-e for the period between 1 July 2029 and 30 June 2034; (3)1,950,000 tonnes of CO2-e for the period between 1 July 2034 and 30 June 2039; (4)1,300,000 tonnes of CO2-e for the period between 1 July 2039 and 30 June 2044;	Implement best-practice technology relevant to urea production and monitor results every 5 years from the commencement of operations. Conduct reviews on available technology and Proposal progress toward 5-yearly limits. GHGMP provides details of reduction and abatement measures taken to meet Net GHG Emission limits over the 5-yearly periods.	CAR Annual Reports Consolidated Reports	Overall	Throughout the Proposal Life. Periods between proposal commencement and 30 June 2029; between 1 July 2029 and 30 June 3034; 1 July 3034 and 30 June 2039; 1 July 2039 and	NR	As the Proposal has not commenced Operations, this condition is not required at this stage.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(5)650,000 tonnes of CO ₂ -e for the period between 1 July 2044 and 30 June 2049; and in any event; and (6)zero tonnes of CO ₂ -e for every five-year period from 1 July 2049 onwards.	<p>Prepare an annual report which for the previous year specifies:</p> <ul style="list-style-type: none"> The quantity of Proposal GHG Emissions and urea produced; and The Emissions Intensity for the proposal <p>Prepare report to CEO and MAC specifying for the 5-year period:</p> <ul style="list-style-type: none"> the quantity of Proposal GHG Emissions; the Net GHG Emissions; <p>Reports will aid with tracking compliance against limit targets.</p>			30 June 2044; 1 July 2044 and 30 June 2049; and every 5 years from 1 July 2049 onwards.		
1180: M3.2	Greenhouse gas management plan	Where the time between the Commencement of Operations and the end of a period specified in condition 3-1 is less than five years, the Net GHG Emissions limit for that period is to be determined in accordance with the following formula: Reduced Net GHG Emissions limit = (A ÷ 1825) x B Where: A is the Net GHG Emissions limit for the period as specified in condition 3-1. B is the number of days between the Commencement of Operations and the	Use the formula: Reduced Net GHG Emissions limit = $(A \div 1825) \times B$, to specify the Net GHG Emissions between the time of commencement of operations and 30 June 2029, if this time frame is less than 5 years.	CAR	Overall		NR	As the Proposal has not commenced Operations, this condition is not required at this stage.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		end of the relevant period specified in condition 3-1.						
1180: M3.3	Greenhouse gas management plan	<p>At least six months prior to Ground Disturbing Activities, or such lesser time approved in writing by the CEO, the proponent shall, in consultation with the Murujuga Aboriginal Corporation, revise, and submit to the CEO, the Perdaman Urea Project Environmental Management Plan Greenhouse Gas Emissions (Final Version PCF2, 12 March 2021) to:</p> <p>(1) be consistent with the achievement of the Net GHG Emissions limits in condition 3 1 subject to the adjustment provided for in condition 3-2 (or achievement of emission reductions beyond those required by those emission limits);</p> <p>(2) specify the estimated Proposal GHG Emissions and Emissions Intensity for the life of the proposal;</p> <p>(3) include a comparison of the estimated Proposal GHG Emissions and Emissions Intensity for the life of the proposal against other comparable facilities;</p> <p>(4) identify and describe any measures that the proponent will implement to avoid, reduce and/or offset (including offsets located in Murujuga and/or with Traditional owners who identify and associate themselves with Murujuga) Proposal GHG Emissions and/or reduce the Emissions Intensity of the proposal; and</p> <p>(5) provide a program for the future review of the plan to:</p> <p>(a) assess the effectiveness of measures referred to in condition 3 3(4); and</p> <p>(b) identify and describe options for future measures that the proponent may or could</p>	<p>Update the GHGMP to address all requirements of Condition 3-3 and resubmit the Greenhouse Gas Management Plan to the CEO.</p> <p>Update and revise plan in consultation with MAC.</p>	Submission of revised GHGMP to the CEO.	Pre-construction	At least six months prior to Ground Disturbing Activities, or such lesser time approved in writing by the CEO	CLD	<p>The Greenhouse Gas Emissions Management Plan (PCF-PD-EN-GHGMP) was submitted to the CEO on 4 March 2022.</p> <p>Consultation with MAC is detailed in section 10 of the GHGMP (PCF 5).</p> <p>Ground Disturbance commenced on the 11 July 2023 (PUP2024-003).</p>



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		implement to avoid, reduce, and/or offset Proposal GHG Emissions and/or reduce the Emissions Intensity of the proposal.						
1180: M3.4	Greenhouse gas management plan	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan at any time; (2) must revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan if there is a material risk that condition 3-1 will not be complied with, including but not limited to as a result of a change to the proposal; (3) must revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan by the date that the first five yearly consolidated report is required to be submitted under condition 3-9(1) and every five years after that date; and (4) must revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan as and when directed to by the CEO.	Through written correspondence to DWER for submission of plans to CEO. Revise, update and resubmit the GHGMP to the CEO with any proposal changes or material risk of condition 3-1 not being complied with. Revise, update and resubmit the GHGMP to the CEO at any time. Revise, update and resubmit the GHGMP to the CEO by the 31 st March 2030 and every five years following that date. Revise, update and resubmit the GHGMP to the CEO when CEO advises to do so. Consult with MAC on all changes to GHGMP. Consultations to occur face to face where required.	Submission of revised GHGMP.	Overall	At any time during the proposal implementation, construction and operations for the life of the Project. Five yearly reviews and resubmissions to occur as follows: 31 st March 2030 31 st March 2035 31 st March 2040 31 st March 2045 31 st March 2050	NR	No revision of the GHGMP has been undertaken during the reporting period
1180: M3.5	Greenhouse gas management plan	The proponent must not undertake the commencement of Ground Disturbing Activities until the CEO has confirmed in writing that the Greenhouse Gas Management Plan referred to in condition 3-3 has been revised and satisfies the requirements of condition 3-3.	Written correspondence that GHGMP meets requirements of condition 3-3 prior to any ground disturbance works commencing.	Written correspondence from CEO advising that the GHGMP satisfies Condition 3-3 and ground disturbance can commence.	Pre-construction	Prior to ground disturbing activities, unless otherwise agreed by the CEO.	C	GHGMP Approval letter dated 17 May 2022 (PUP2024-004). Ground Disturbance commenced on the



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								11 July 2023 (PUP2024-003). Confirmed GHGMP was approved by the DWER 14 months prior to GDA commencing.
1180: M3.6	Greenhouse gas management plan	Within one month of receiving confirmation in writing from the CEO that: (1) the Greenhouse Gas Management Plan referred to in condition 3-3 has been revised and satisfies condition 3-3; or (2) any subsequent version of the Confirmed Greenhouse Gas Management plan submitted under condition 3-4 satisfies condition 3-3, the proponent must submit a separate summary of the relevant plan to the CEO for public disclosure, which must: (3) include a summary of the matters specified in conditions 3-3(1) to 3-3(4); and (4) be published as required by condition 3-11(2).	Written correspondence of confirmation from CEO that plan satisfies condition 3-3. Prepare a separate summary of the GHGMP that can be publicly disclosed. Publish the approved, revised version of the GHGMP Summary.	Publication of most recent GHGMP (Summary) on the Perdaman Project Website.	Overall	Within one month of receiving Confirmation in writing from the CEO	NC	The GHGMP (Version PCF 5, 4 March 2022) was confirmed by the CEO to have satisfied the requirements of condition 3-3 on 17 May 2022 (PUP2024-004). Condition 3-6(4) requires the Confirmed GHGMP to be published in accordance with Condition 3-11(3). Condition 3-11(3) states the Confirmed GHGMP is to be published on the proponent's website within two weeks of receiving written confirmation from the CEO. Therefore, the publication of the



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								Confirmed GHGMP was due 31 May 2022. The Confirmed GHGMP was published on the Website on 10 May 2023.
1180: M3.7	Greenhouse gas management plan	The proponent shall implement the most recent version of the Confirmed Greenhouse Gas Management Plan until the CEO has confirmed by notice in writing that it has been demonstrated that the Net GHG Emissions limits in condition 3-1 have been met.	Implementation of the most recent version of the Confirmed GHGMP. Written Correspondence with CEO and DWER that the Proposal has demonstrated that the Net GHG Emissions limits in condition 3-1 have been met .	Written Correspondence. Most recent revision GHGMP.	Overall	Throughout the Proposal Life until the Net GHG Emissions limits in condition 3-1 have been met.	NR	As the Proposal has not commenced Operations, this condition is not required at this stage.
1180: M3.8	Greenhouse gas management plan	The proponent shall submit an annual report to the CEO and the Murujuga Aboriginal Corporation, each year by 31 March, commencing on the first 31 March after the Commencement of Operations, or such other date within that financial year as is agreed by the CEO to align with other reporting requirements for GHG, specifying for the previous financial year: (1) the quantity of Proposal GHG Emissions and urea produced; and (2) the Emissions Intensity for the proposal.	Prepare and submit an annual report to the CEO and MAC each year by 31 st March following commencement of operations. Written correspondence. Written correspondence where another date within that financial year as is agreed by the CEO to align with other reporting requirements for GHG.	Annual Report submitted. Written Correspondence.	Overall	Annually by 31 March, commencing on the first 31 March after the Commencement of Operations, or such other date within that financial year as is agreed by the CEO.	NR	As the Proposal has not commenced Operations, this condition is not required at this stage.
1180: M3.9	Greenhouse gas management plan	The proponent shall submit to the CEO and the Murujuga Aboriginal Corporation, by 31 March 2030 or such other date within that financial year as is agreed by the CEO to align with other reporting	Prepare a consolidated report for CEO and MAC. Report the quantity and emission intensity of GHG emissions from the proposal, including the type,	Submission of Consolidated Report to CEO and MAC. Written correspondence.	Overall	By 31 March 2030 or such other date within that financial year	NR	31 March 2030 falls outside of the CAR (2024) reporting period.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>requirements for GHG, and every fifth year thereafter:</p> <p>(1) a consolidated report specifying:</p> <p>(a) for each of the preceding five financial years, the matters referred to in conditions 3-8(1) and (2);</p> <p>(b) for the period specified in condition 3-1 that ended on 30 June of the year before the report is due:</p> <p>i. the quantity of Proposal GHG Emissions;</p> <p>ii. the Net GHG Emissions;</p> <p>iii. the type, quantity, identification or serial number, and date of retirement or cancellation of any Authorised Offsets which have been retired or cancelled and which have been used to calculate the Net GHG Emissions referred to in condition 3-9(1)(b)ii, including written evidence of such retirement or cancellation; and</p> <p>iv. any measures that have been implemented to avoid or reduce Proposal GHG Emissions;</p> <p>(2) an audit and peer review report of the consolidated report required by condition 3-9(1), carried out by an independent person or independent persons with suitable technical experience dealing with the suitability of the methodology used to determine the matters set out in the consolidated report, whether the consolidated report is accurate and whether the consolidated report is supported by credible evidence.</p>	<p>quantity, identification or serial number and date of retirement or cancellation of any Authorised Offsets (with evidence in writing) which have been used to calculate Net GHG emissions, in addition to any measures implemented to reduce GHG emissions by an independent person with suitable technical experience.</p> <p>Engage an independent person or independent persons with suitable technical experience to conduct Peer Review of the consolidated report.</p> <p>Written correspondence.</p>	Peer Review report findings.		as is agreed by the CEO.		
1180: M3.10	Greenhouse gas management plan	A consolidated report referred to in condition 3-9(1) must be accompanied by:	Prepare the Consolidated Report and Submit to CEO and MAC.	Submission of Consolidated Report to CEO and MAC.	Overall	By 31 March 2030 or such other date within that	NR	As the Proposal has not commenced Operations, this condition is not



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>(1) a revision of the Confirmed Greenhouse Gas Management Plan under condition 3-4(3); and</p> <p>(2) a separate summary report, for the period specified in condition 3-1 that ended on 30 June of the year before the report is due and any previous periods specified in condition 3-1, and which includes:</p> <p>(a) a graphical comparison of Net GHG Emissions with the Net GHG Emissions limits detailed in condition 3-1 (subject to the adjustment provided for in condition 3-2);</p> <p>(b) proposal Emissions Intensity compared to comparable facilities;</p> <p>© a summary of measures to reduce the Proposal GHG Emissions undertaken by the proponent for compliance periods detailed in condition 3-1; and</p> <p>(d) a clear statement as to whether limits for Net GHG Emissions set out in condition 3-1 have been met, and whether future Net GHG Emissions limits are likely to be met, including a description of any reasons why those limits have not been, and/or are unlikely to be met.</p>	<p>Revise and resubmit the current version of the GHGMP.</p> <p>Prepare a separate summary report for the period that ended on 30 June 2029 and for every 5-year period thereafter (as specified in condition 3-1).</p> <p>Conduct a comparison of emission intensity compared to comparable facilities to report in the summary report.</p> <p>Prepare graphical comparisons of Net GHG Emissions with Net Emission limits.</p> <p>Prepare a summary of measures that will be and have been applied to reduce GHG Emissions.</p> <p>Determine and report on whether limits to Net emissions are likely to be met, including a description of reasons as to why they have not/are likely not to be met.</p>	<p>Written correspondence.</p> <p>Summary Report.</p>		<p>financial year as is agreed by the CEO.</p> <p>Every five years after 31 March 2030 – 31st March 2030</p> <p>31st March 2035</p> <p>31st March 2040</p> <p>31st March 2045</p> <p>31st March 2050</p>		required at this stage.
1180: M3.11	Greenhouse gas management plan	The proponent shall make the Confirmed Greenhouse Gas Management Plan, the summary of that plan, and all reports required by this condition 3 publicly available on the proponent's website within the timeframes specified below for the life of the proposal, or in any other manner or time specified by the CEO:	<p>Publish the approved, revised and current version of the GHGMP within two weeks of written correspondence and confirmation from the CEO.</p> <p>Publish the current and previous versions of the Summary of any GHGMP within two weeks of the</p>	<p>Written correspondence from the CEO of GHGMP approval status.</p> <p>Publication of most recent GHGMP (Summary) on the</p>	Overall	<p>For the Life of the Proposal.</p> <p>Publish the most current approved GHGMP, Summary, annual report</p>	NC	<p>GHGMP was published on the Website on 10 May 2023</p> <p>https://www.perdamanindustries.com.au/wp-content/uploads/202</p>



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(1)any Confirmed Greenhouse Gas Management Plan, within two weeks of receiving written confirmation from the CEO as referred to in condition 3-5; (2)the summary of any Confirmed Greenhouse Gas Management Plan referred to in condition 3-6 and the reports referred to in conditions 3-8, 3-9, and 3-10 within two weeks of submitting the document to the CEO.	Summary being submitted to the CEO. Publish the current and previous versions of the Annual reports and Consolidated Reports within two weeks of submitting the reports to the CEO.	Proponent's Project Website.		and consolidated reports on the Proponent's Project Website within 2 weeks of them being approved in writing by CEO.		3/05/PCF-PD-EN-GHGMP_PCF5.pdf The GHGMP was confirmed by the CEO on 17 May 2022 (PUP2024-004). Part 2 of this condition is not relevant as condition 3-8, 3-9 and 3-10 are not required at this stage.
Flora and Vegetation Management								
1180: M4.1	Flora and vegetation	The proponent shall implement the proposal to meet the following environmental outcomes: (1) the extent of native vegetation clearing within the development envelope shall not exceed 73.05 ha; and (2) the extent of clearing within the vegetation community identified as Priority 1 (P1) Priority Ecological Community (PEC) – Burrup Peninsula Rock Pile Communities shall not exceed 0.16 ha.	Implementation of the approved Confirmed Flora Management Plan. Defined triggers and thresholds to measure compliance with this condition. Implementation of the Ground Disturbance Permit Procedure (45826-HSE-PL-G-1024_GDP). GIS Mapping with defined Clearing boundaries and extents.	Annual Environmental Report. CAR. Confirmed Flora Management Plan (PCF-PD-EN-FMP).	Overall	For the life of the Project	C	The following documents have been submitted as evidence for this Condition: <ul style="list-style-type: none"> Map of Clearing Extents (PUP2024-005) Clearing Data (PUP2024-002) Extent of Native Vegetation Clearing for the reporting period: <ul style="list-style-type: none"> 57.08 Ha



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								Extent of clearing within the vegetation community identified as Priority 1 (P1) Priority Ecological Community (PEC) for the reporting period: <ul style="list-style-type: none"> • 0.10 ha
1180: M4.2	Flora and vegetation	The proponent shall implement the proposal to achieve the following environmental objective: (1) all direct impacts (other than the direct impacts authorised under condition 4-1) are avoided and minimise indirect impacts to native vegetation.	Implementation of the approved Confirmed Flora Management Plan (FMP). Implementation of the Ground Disturbance Permit Procedure (45826-HSE-PL-G-1024_GDP).	Confirmed Flora Management Plan (PCF-PD-EN-FMP).	Overall	For the life of the Project.	C	Refer to Section 4.3, Table 2 of this CAR for details of compliance with objective. No non-compliances were identified with this objective.
1180: M4.3	Flora and vegetation	At least six months prior to Ground Disturbing Activities, or such lesser time approved in writing by the CEO, the proponent shall submit to the CEO and the DAWE, a revised version of the Flora Management Plan, Urea Project Burrup Peninsula, Western Australia (Version PCF 1, 12 January 2021) which has been prepared in consultation with the Murujuga Aboriginal Corporation and meets the requirements of condition 4-7.	Revise and update the current version of the FMP to address all requirements within condition 4-7 and submit the FMP to CEO and DAWE at least 6 months prior to commencement of ground disturbance. Submission through DWER. Consult with MAC, in person meeting and consultation. Written evidence of meeting and correspondence with MAC.	Submission of revised FMP to CEO and the DAWE.	Pre-construction	At least six months prior to Ground Disturbing Activities, or such lesser time approved in writing by the CEO	C	Revised FMP Submitted to DWER & DAWE on 21 February 2022 (PUP2024-006). Ground Disturbing Activities (Clearing) commenced July 11, 2023 (PUP2024-003). Revised FMP was submitted to DWER and DAWE 17 months prior to



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
			Written correspondence through the DWER with CEO and DAWE on approval status of FMP.					ground disturbing activities commencing.
1180: M4.4	Flora and vegetation	The proponent must not commence Ground Disturbing Activities until the CEO has confirmed in writing that the Flora Management Plan submitted under condition 4-3 satisfies the requirements of condition 4-7.	Written correspondence that FMP meets requirements of condition 4-7 prior to any ground disturbance works commencing.	Written correspondence from CEO advising that the FMP satisfies Condition 4-7 and ground disturbance can commence.	Pre-construction	Prior to ground disturbing activities, unless otherwise agreed by the CEO.	C	Written correspondence from CEO advising that the FMP satisfies Condition 4-7 on the 11 March 2022 (PUP2024-006) and ground disturbance can commence. Ground Disturbance commenced 11 July 2023 (PUP2024-003).
1180: M4.5	Flora and vegetation	The proponent shall implement the most recent version of the Confirmed Flora Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcomes in condition 4-1 and objectives detailed in condition 4-2 have been met.	Written correspondence from the CEO through the DWER that the proposal has demonstrated environmental outcomes in condition 4-1 and objectives detailed in condition 4-2 have been met.	Written correspondence from CEO advising that the environmental outcomes and objectives for flora have been met.	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 4-1 and 4-2 has been met.	C	All requirements specified in the Confirmed Flora Management Plan have been, or are being, fulfilled. The environmental outcomes required to be implemented are being achieved. The Environmental objectives are being met.



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M4.6	Flora and vegetation	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review and revise a Confirmed Flora Management Plan and submit it to the CEO and the DAWE; and (2) shall review and revise a Confirmed Flora Management Plan and submit it to the CEO and the DAWE as and when directed by the CEO.	Consultation with MAC when revisions to the FMP are made. Written correspondence. Revised version of the FMP will be prepared in consultation with MAC and submitted to CEO and DAWE.	Revised FMP.	Overall	As required by the Proponent or as directed, requested by the CEO or DAWE.	NR	Revision of the Plan was not required within the reporting period.
1180: M4.7	Flora and vegetation	Any revision of the Flora Management Plan, Perdaman Urea Project Burrup Peninsula, Western Australia (Version PCF 1, 12 January 2021) or a Confirmed Flora Management Plan submitted to the CEO shall: (1) demonstrate how the outcomes in condition 4-1 and the objective in condition 4-2 will be achieved; (2) include provisions to manage impacts from: (a) clearing; (b) changes to surface water flows, including increase and decrease in extent of flooding; (c) changes to surface water quality; (d) changes to groundwater regimes; (e) dust; (f) weeds; and (g) fire; (3) provide for relevant traditional owners to be invited to observe any Ground Disturbing Activities and during construction, and take reasonable steps to facilitate the observation of those activities by those persons;	Any revisions of the FMP submitted to the CEO must meet the condition requirements.	Revised FMP that meets the requirements of Condition 4-7 (1), (2), (3), (4), (5), (6), (7) and (8).	Overall	Any time there is a revision of the FMP or Confirmed FMP.	C	The revised FMP satisfies the requirements of condition 4-7 as evidenced by the Letter from DWER (PUP2024-006). The FMP includes all information listed in M 4.7 (1) – (8).



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>(4) specify trigger criteria that will trigger the implementation of management and/or contingency actions to prevent direct or indirect impacts to the vegetation communities listed in conditions 4-1(1) and 4-1(2);</p> <p>(5) specify threshold criteria to demonstrate compliance with condition 4-1 and condition 4-2;</p> <p>(6) specify monitoring methodology to determine if trigger criteria and threshold criteria have been met;</p> <p>(7) specify management and/or contingency actions to be implemented if the trigger criteria required by condition 4-7(4) and/or the threshold criteria required by condition 4-7(5) have not been met; and</p> <p>(8) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that conditions 4-1 and 4-2 have been met over the reporting period in the Compliance Assessment Report required by condition 15-6.</p>						
1180: M4.8	Flora and vegetation	<p>In the event that the environmental outcomes in condition 4-1 are exceeded, or monitoring or investigations at any time indicate an exceedance of threshold criteria specified in a Confirmed Flora Management Plan, the proponent shall:</p> <p>(1) report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified;</p> <p>(2) implement the management and/or contingency actions required by condition 4-7(7) within seven days of the</p>	<p>Initial written correspondence to the CEO and the DAWE within the required timeframes.</p> <p>a) Within Seven days of an exceedance of threshold criteria being identified; or</p> <p>Written correspondence to CEO and the DAWE that the management and contingency actions to be implemented within</p>	<p>Exceedance Reports and Notifications to CEO and DAWE.</p>	Overall	Report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified;	NR	There have been no exceedances of the environmental outcomes in condition 4-1 within the Reporting Period.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>exceedances being reported as required by condition 4-8(1) or such lesser time set out in the Confirmed Flora Management Plan and continue implementation of those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the threshold criteria are being met and implementation of the management and/or contingency actions are no longer required;</p> <p>(3) investigate to determine the cause of the threshold criteria being exceeded;</p> <p>(4) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded;</p> <p>(5) provide a further report to the CEO and the DAWE within 21 days of the exceedance being reported as required by condition 4-8(1), which shall include:</p> <p>(a) details of the management and/or contingency actions implemented;</p> <p>(b) the effectiveness of the management and/or contingency actions implemented against the threshold criteria;</p> <p>(c) the findings of the investigations required by conditions 4-8(3) and 4-8(4);</p> <p>(d) measures to prevent the threshold criteria being exceeded in the future;</p> <p>(e) measures to prevent, control or abate the environmental harm which may have occurred; and</p> <p>(f) justification of the threshold criteria remaining, or being adjusted based on better understanding, demonstrating that outcomes will continue to be met.</p>	<p>seven days of the exceedance being identified.</p> <p>Written correspondence from CEO that it has been demonstrated that trigger criteria and/or threshold criteria are being met and implementation of the management and/or contingency actions are no longer required.</p> <p>Written correspondence in the form of a report to the CEO and DAWE within 21 days of exceedance being identified to include:</p> <ul style="list-style-type: none"> • Report of contingency/management actions, preventative measures implemented. • Effectiveness of applied management and contingency actions. • Findings of any investigations carried out. • Further measures to prevent future exceedances. • Measures to prevent, control or abate the environmental harm which may have occurred. • Justifications if trigger and/or threshold values remain the same or being adjusted. 			<p>and/or contingency actions required by condition 5-3(8) within seven days of the exceedances being reported as required by condition 5-6(1).</p>		



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M4.9	Flora and vegetation	Without limiting condition 4-5 (implementation of the plan) and notwithstanding compliance with condition 4-8 (response to exceedance), the proponent must not cause or allow: (1) a failure to implement one or more management and/or contingency actions, if the relevant threshold criteria have been exceeded; (2) the exceedance of a threshold criteria (regardless of whether management and/or contingency actions have been or are being implemented), and/or (3) failure to comply with the requirements of the Confirmed Flora Management Plan.	Written correspondence.	Most recent version of FMP. Exceedance Reports. Written Correspondence of Exceedances and response actions.	Overall	Life of the Project.	NR	There have been no exceedances of the threshold criteria within the Reporting Period, all required management and/or contingency actions have been implemented and requirements have been complied with. Refer to the Compliance Status Summary (Table 2) for the FMP in section 4.3.
Terrestrial Fauna Management								
1180: M5.1	Terrestrial fauna management	The proponent shall implement the proposal to meet the following environmental outcomes: (1) clearing in the fauna habitat type identified as Rocky Outcrops shall not exceed 0.16 ha; (2) clearing in the fauna habitat type identified as Hummock Grasslands on Mid-slopes shall not exceed 49.17 ha; (3) clearing in the fauna habitat type identified as Samphire Shrublands / Supratidal flats shall not exceed 11.97 ha; (4) clearing in the fauna habitat type identified as Drainage Lines shall not exceed 2.7 ha; and (5) impacts to short-range endemic fauna species are avoided, unless it is demonstrated, and the CEO confirms in writing that the species occurs in a self-	Implementation of the approved Confirmed Fauna Management Plan. Implementation of the approved Threatened Species Management Plan. Defined triggers and thresholds to measure compliance with this condition 5-1. Implementation of the Ground Disturbance Permit Procedure (45826-HSE-PL-G-1024_GDP). GIS Mapping with defined Clearing boundaries and extents of fauna habitat.	Annual Environmental Report. CAR. GIS Mapping with Defined clearing boundaries. Confirmed Fauna Management Plan (PCF-PD-EN-FaMP_PCF4, 12 May 2022).	Overall	For the life of the Project.	C	<u>Outcomes:</u> Clearing in the fauna habitat type identified as Rocky Outcrops less than 0.16 ha at 0.10 ha during the reporting period. Clearing in the fauna habitat type identified as Hummock Grasslands on Mid-slopes less than 49.17 ha at 46.16 ha during the reporting period.



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		sustaining population outside the development envelope.						<p>Clearing in the fauna habitat type identified as Samphire Shrublands / Supratidal flats less than 11.97 ha at 11.50 ha during the reporting period.</p> <p>Clearing in the fauna habitat type identified as Drainage Lines less than 2.7 ha at 2.41 ha during the reporting period.</p> <p>Condition 5-1(5) does not apply as the Proponent has demonstrated that short-range endemic fauna species occur in self-sustaining populations outside the development envelope.</p> <p>Evidence within PUP2024-002 and PUP2024-005.</p>
1180: M5.2	Terrestrial fauna management	The proponent shall implement the proposal to achieve the following environmental objective:	Implementation of the approved Confirmed Fauna Management Plan (FaMP).	CAR. Confirmed Fauna Management Plan (PCF-PD-EN-	Overall	For the life of the Project.	C	Refer to Section 4.3, Table 3 of this CAR for details of compliance with objective.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(1) minimise direct and indirect impacts to the northern quoll, Pilbara olive python and the ghost bat within the development envelope.	Implementation of the approved Threatened Species Management Plan (TSMP).	FaMP_PCF4, 12 May 2022). Confirmed Threatened Species Management Plan (PCF-PD-EN-TSMP_PCF5, 23 February 2023).				No non-compliances were identified with this objective.
1180: M5.3	Terrestrial fauna management	At least six months prior to Ground Disturbing Activities within the development envelope delineated in Figure 2, or such lesser time approved in writing by the CEO, the proponent shall, in consultation with the Murujuga Aboriginal Corporation and DAWE, revise and submit to the CEO the Fauna Management Plan (PCF-PD-EN-FaMP, Version PCF 1, 12/01/2021) and the Threatened Species Management Plan (PCF-PD-EN-TSMP, PCF 1, 12/01/2021), one or both of which shall: (1) demonstrate how the environmental outcomes in condition 5-1 and environmental objective in condition 5-2 will be achieved; (2) include details of the outcomes of a detailed short-range endemic fauna survey undertaken within the development envelope and surrounding region at least six months prior to Ground Disturbing Activities; (3) include provisions to avoid where practicable and otherwise minimise impacts to significant terrestrial fauna species, including short-range endemic fauna and migratory birds, including, but not limited to, impacts from:	Revise and update the current version of the FaMP and the TSMP to address all requirements within condition 5-3 and resubmit the FaMP to CEO and the TSMP to the DAWE. Submission through DWER. Consult with MAC, in person meeting and consultation. Written evidence of meeting and correspondence with MAC. Written correspondence through the DWER with CEO and DAWE on approval status of FaMP and TSMP.	Submission of revised FaMP to CEO. Submission of the TSMP to the DAWE.	Pre-construction	At least six months prior to Ground Disturbing Activities, or such lesser time approved in writing by the CEO.	C	Submission of revised FaMP (Version PCF-PD-EN-FaMP_PCF4, 12 May 2022) to CEO and the DAWE. Submission of revised TSMP version (PCF-PD-EN-TSMP_PCF5, 23 February 2022). Submitted to DWER & DAWE. The FaMP and the TSMP includes all information listed in M 5.3 (1) – (9). Ground Disturbing Activities (Clearing) commenced July 11, 2023 (PUP2024-003). Revised FaMP was submitted to DWER



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>(a) clearing of habitat; (b) lighting; (c) noise and vibration; (d) dust; (e) vehicle and machinery movement strike; (f) entrapment in trenches or ponds; (g) the attraction of feral animals; and (h) fire; (4) provide for relevant traditional owners to be invited to observe any Ground Disturbing Activities and during construction, and take reasonable steps to facilitate the observation of those activities by those persons; (5) specify trigger criteria that will trigger the implementation of management and/or contingency actions to prevent direct or indirect impacts to significant terrestrial fauna species, including short-range endemic fauna; (6) specify threshold criteria to demonstrate compliance with conditions 5-1 and 5-2; (7) specify monitoring methodology to determine if trigger criteria and threshold criteria have been met; (8) specify management and/or contingency actions to be implemented if the trigger criteria required by condition 5-3(5) and/or the threshold criteria required by condition 5-3(6) have not been met; and (9) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that conditions 5-1 and 5-2 have been met over the reporting period in</p>						<p>14 months prior to ground disturbing activities commencing and the TSMP was submitted to DCCEEW 17 months prior to ground disturbing activities.</p>



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		the Compliance Assessment Report required by condition 15-6.						
1180: M5.4	Terrestrial fauna management	The proponent must not commence Ground Disturbing Activities until the CEO has confirmed in writing that the Fauna Management Plan and the Threatened Species Management Plan satisfy the requirements of condition 5-3.	Written Correspondence that the FaMP and the TSMP satisfies the requirements of 5-3 from CEO and from DAWE for the TSMP.	Written correspondence from CEO advising the FaMP and the TSMP satisfies condition requirements of 5-3.	Pre-construction	Prior to ground disturbing activities unless otherwise agreed by the CEO.	C	<p>Letter from DWER to the Proponent dated 7 July 2022 (PUP2024-007) approving the FaMP satisfies the condition requirements of 5-3.</p> <p>Letter from DCCEEW (26 February 2022) confirming the TSMP satisfies the condition requirements of 5-3 (PUP2024-008).</p> <p>Ground Disturbance commenced on the 11 July 2023 (PUP2024-003).</p>
1180: M5.5	Terrestrial fauna management	The proponent shall implement the most recent versions of the Confirmed Fauna Management Plan and Confirmed Threatened Species Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcomes in condition 5-1 and objectives detailed in condition 5-2 have been met.	Written correspondence from the CEO through the DWER that the proposal has demonstrated environmental outcomes in condition 5-1 and objectives detailed in condition 5-2 have been met.	Written correspondence from the CEO advising that the Proponent has demonstrated that the environmental outcomes in condition 5-1 and objectives detailed in condition 5-2 have been met.	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 5-1 and 5-2 has been met.	C	All requirements specified in the Confirmed Fauna Management Plan and Threatened Species Management Plan have been, or are being, fulfilled. The environmental outcomes in condition 5-1 and objectives detailed in condition 5-2



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								required to be implemented are being achieved.
1180: M5.6	Terrestrial fauna management	<p>In the event that the environmental outcomes in condition 5-1 are exceeded, or monitoring or investigations at any time indicate an exceedance of threshold criteria specified in the Confirmed Fauna Management Plan or Confirmed Threatened Species Management Plan, the proponent shall:</p> <p>(1) report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified; (2) implement the management and/or contingency actions required by condition 5-3(8) within seven days of the exceedances being reported as required by condition 5-6(1) and continue implementation of those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the threshold criteria are being met and implementation of the management and/or contingency actions are no longer required; (3) investigate to determine the cause of the threshold criteria being exceeded; (4) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded; (5) provide a further report to the CEO and the DAWE within 21 days of the exceedance being reported as required by condition 5-6(1) which report shall include:</p>	<p>Initial written correspondence to the CEO and the DAWE within the required timeframes.</p> <p>b) Within Seven days of an exceedance of threshold criteria being identified; or</p> <p>Written correspondence to CEO and the DAWE that the management and contingency actions to be implemented within seven days of the exceedance being identified.</p> <p>Written correspondence from CEO that it has been demonstrated that trigger criteria and/or threshold criteria are being met and implementation of the management and/or contingency actions are no longer required.</p> <p>Written correspondence in the form of a report to the CEO and DAWE within 21 days of exceedance being identified to include:</p> <ul style="list-style-type: none"> Report of contingency/management actions, preventative measures implemented. 	<p>Letter to CEO reporting the exceedance.</p> <p>Letter from CEO confirming implementation of the management and/or contingency actions are no longer required.</p> <p>Written Report to CEO and DAWE within 21 days of exceedance being reported.</p>	Overall	Report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified; (2) implement the management and/or contingency actions required by condition 5-3(8) within seven days of the exceedances being reported as required by condition 5-6(1).	NR	No exceedances of the environmental outcomes in condition 5-1 within the Reporting Period.



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(a) details of management and/or contingency actions implemented; (b) the effectiveness of the management and/or contingency actions implemented against the threshold criteria; (c) the findings of the investigations required by conditions 5-6(3) and 5-6(4); (d) measures to prevent the threshold criteria being exceeded in the future; (e) measures to prevent, control or abate the environmental harm which may have occurred; and (f) justification of the threshold criteria remaining, or being adjusted based on better understanding, demonstrating that outcomes will continue to be met.	<ul style="list-style-type: none"> Effectiveness of applied management and contingency actions. Findings of any investigations carried out. Further measures to prevent future exceedances. Measures to prevent, control or abate the environmental harm which may have occurred. Justifications if trigger and/or threshold values remain the same or being adjusted. 					
1180: M5.7	Terrestrial fauna management	Without limiting condition 5-5 (implementation of the plans) and notwithstanding compliance with condition 5-6 (response to exceedance), the proponent must not cause or allow: (1) a failure to implement one or more management and/or contingency actions, if the relevant threshold criteria have been exceeded; (2) the exceedance of a threshold criteria (regardless of whether the relevant management and/or contingency actions have been or are being implemented); and/or (3) a failure to comply with the requirements of the Confirmed Fauna Management Plan or the Confirmed Threatened Species Management Plan.	Written correspondence.	Letter to the CEO. CAR.	Overall	Life of the Project.	NR	There were no exceedances or failures to implement management actions/contingency actions or to comply with the requirements of the Confirmed FaMP and the TSMP during the reporting period. Refer to the Compliance Status Summaries Table 3 and Table 4 for the FaMP and TSMP



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								within section 4.3 of this report.
1180: M5.8	Terrestrial fauna management	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review and revise the Confirmed Fauna Management Plan and/or Confirmed Threatened Species Management Plan and submit it to the CEO and the DAWE; and (2) shall review and revise the Confirmed Fauna Management Plan and/or Confirmed Threatened Species Management Plan and submit it to the CEO and the DAWE as and when directed by the CEO.	Consultation with MAC when revisions to either the FaMP or the TSMP are made. Written correspondence. Revised version of the FaMP and / or the TSMP will be prepared in consultation with MAC and submitted to CEO and DAWE.	Letter to the CEO and DAWE advising the proponent's proposed changes to the FaMP and/or TSMP, or advising changes made at the request of the CEO and the DAWE. Updated and revised version of the FaMP and/or TSMP. Consultation with MAC Letter.	Overall	As required by the Proponent or as directed, requested by the CEO or DAWE.	NR	Revision of the plans has not been required during the reporting period.
Hydrogeological Management								
1180: M6.1	Hydrogeological management	The proponent shall implement the proposal to meet the following environmental objective: (1) minimise project attributable impacts on groundwater quality, flow direction and/or depth to maintain the hydrological regimes and quality of groundwater and surface water so that environmental values are protected.	Implementation of the approved Confirmed Hydrogeological Management Plan. Defined triggers and thresholds to measure compliance with this condition 6-1.	Annual Environmental Report. CAR. HGMP.	Overall	For the life of the Project	C	Refer to section 4.3 and the status of compliance with Surface Water Management plan objectives within Table 5. No non-compliances were identified with this objective.
1180: M6.2	Hydrogeological management	At least six months prior to Ground Disturbing Activities, the proponent shall provide the CEO with the results of supplementary detailed hydrogeological	Engage a Consultant to conduct a detailed Hydrogeological study that aims to quantify baseline groundwater quality, flow	Results in a factual and interpretive Hydrogeological Report provided to	Pre-construction	At least six months prior to Ground	CLD	Project Destiny Baseline Hydrogeological Assessment Ref:



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>studies undertaken by or on behalf of the proponent to quantify baseline groundwater quality, groundwater flow directions, and the depth to groundwater beneath Sites C and F shown on Figure 2 and such studies shall meet the requirements of the:</p> <p>(1) Department of Water 2009, Operational Policy No. 5.12 - Hydrogeological reporting associated with a groundwater well licence, Department of Water, Perth, November 2009; and</p> <p>(2) EPA Victoria 2006, Hydrogeological Assessment (Groundwater Quality) Guidelines, September 2006.</p>	<p>directions and depth to groundwater beneath Sites C and F.</p> <p>The proponent to provide the results of the hydrogeological study to the CEO in report format.</p> <p>Compliance with the applicable guidelines (Department of Water 2009, Operational Policy No. 5.12 EPA Victoria 2006, Hydrogeological Assessment (Groundwater Quality) Guidelines) will be demonstrated in the factual and interpretive reports.</p> <p>Compliance Assessment Report.</p> <p>Written correspondence.</p>	<p>the CEO (on behalf of the Proponent), conducted by a consultant. CAR.</p>		Disturbing Activities.		<p>754-PEREN296568 (Rev 0) was submitted to the CEO on 19 July 2022 (PUP2024-014).</p> <p>Ground Disturbance commenced on the 11 July 2023 (PUP2024-003).</p> <p>Studies were provided 12 months prior to GDA commencing.</p>
1180: M6.3	Hydrogeological management	<p>In the event that the studies referred to in condition 6-2 indicate that dewatering would be required during construction, the proponent shall develop in consultation with the Murujuga Aboriginal Corporation, and submit to the CEO together with the studies referred to in condition 6-2 a Hydrogeological Management Plan:</p> <p>(1) containing management measures for dewatering to meet the environmental objective in condition 6-1;</p> <p>(2) setting out the design, construction and location of groundwater dewatering infrastructure and groundwater monitoring</p>	<p>Consult with MAC, in person meeting and consultation.</p> <p>Written evidence of meeting and correspondence with MAC.</p> <p>If hydrogeological study indicates dewatering is required, then prepare and develop a Hydrogeological Management Plan (HGMP) in consultation with MAC to address all requirements within condition 6-3 and submit the HGMP to CEO.</p>	<p>MAC consultation letters.</p> <p>Submission of HGMP to CEO.</p> <p>Written correspondence between Proponent and DWER of submission of the HGMP to CEO.</p> <p>Letter to CEO.</p>	Overall	In the event studies from condition 6-2 demonstrate dewatering would be required during construction.	NR	<p>Studies conducted prior to ground disturbance, demonstrated dewatering would not be required for the 2023-2024 reporting period, this was confirmed in writing by the CEO (PUP2024-014).</p>



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		bores to meet the environmental objective in condition 6-1; (3) that applies the Department of Water and Environmental Regulation's Water Quality Protection Note 30 on Groundwater Monitoring Bores (DoW 2006) and the National Uniform Drillers Licensing Committee's Minimum Construction Requirements for Water Bores in Australia – fourth edition (NUDLC 2020); (4) specifying trigger criteria that will trigger the implementation of management and/or contingency actions to prevent direct or indirect impacts; (5) specifying threshold criteria to demonstrate compliance with condition 6-1; (6) specifying monitoring methodology to determine if trigger criteria and threshold criteria have been met; (7) specifying management and/or contingency actions to be implemented if the trigger criteria required by condition 6-3(4) and/or the threshold criteria required by condition 6-3(5) have not been met; and (8) providing the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that the objective in condition 6-1 has been met over the reporting period in the Compliance Assessment Report required by condition 15-6.	Written correspondence through the DWER with CEO on approval status of HGMP. If the studies coupled with the construction methodology deem that dewatering is not required a letter will be provided to CEO through DWER explaining the Proponents approach and rationale.					
1180: M6.4	Hydrogeological management	The proponent must not commence dewatering until the CEO has confirmed in writing that the Hydrogeological	Written Correspondence from the CEO that the HGMP satisfies the requirements of condition 6-3.	Written correspondence from CEO advising the HGMP satisfies	Overall	Prior to dewatering.	NR	Not Required during the 2023-2024 Reporting Period.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		Management Plan satisfies the requirements of condition 6-3.		condition requirements of 6-3.				
1180: M6.5	Hydrogeological management	The proponent shall implement the most recent version of the Confirmed Hydrogeological Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental objective detailed in condition 6-1 has been met.	Implementation of the most recent version of the Hydrogeological Management Plan. Implementation of the updated Hydrogeological Management Plan upon written confirmation by the CEO.	Written correspondence from CEO advising that the HGMP satisfies condition objective of 6-1.	Overall	For the life of the Project.	NR	Not Required during the 2023-2024 Reporting Period.
1180: M6.6	Hydrogeological management	The proponent shall sample and monitor all groundwater bores required by condition 6-3 to be identified in the Confirmed Hydrogeological Management Plan at least every six months and compare the results against the baseline groundwater quality, groundwater flow directions, and depth to groundwater obtained from the hydrogeological studies referred to in condition 6-2.	Implementation of the monitoring requirements specified in the Confirmed Hydrogeological Management Plan every 6 months. Compare monitoring results required by condition 6-6 and 6-7(4) with the baseline data from the supplementary hydrogeological study and include in a bi-annual monitoring report.	Submission to the CEO of a Bi-annual monitoring report.	Overall	At least every 6 months from commencement of ground disturbing activities.	NR	Not Required during the 2023-2024 Reporting Period.
1180: M6.7	Hydrogeological management	In the event that monitoring required by condition 6-6 or provided for in the management plan indicates an exceedance of trigger levels: (1) the proponent shall report such findings to the CEO within seven days of the exceedance being identified; (2) the proponent shall provide evidence which allows determination of the cause of the exceedance; (3) if the exceedance is determined by the CEO to be attributable to the proposal, the proponent shall submit to the CEO actions	Where monitoring identifies an exceedance of trigger levels, the exceedance will be reported to the CEO within seven days of being identified. Investigate to determine the cause of exceedance and report the cause to the CEO. Determine and submit relevant actions to be taken to address the exceedance (within seven	Submission to the CEO of a Bi-annual monitoring report. Monthly Environmental Performance Report. Annual Environmental Report.	Overall	The proponent shall report exceedance findings to the CEO within seven days of the exceedance being identified. The proponent shall submit to	NR	Not Required during the 2023-2024 Reporting Period.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		to be taken to address the exceedance within seven days of the proponent being notified in writing of the determination being made; (4) the proponent shall implement the actions to address the exceedance referred to in condition 6-7(3), shall the monitor the effectiveness of those actions, and shall continue to implement and monitor the actions until such time as the CEO determines that the actions may cease; and (5) the proponent shall submit bi-annually, or at a frequency defined to the satisfaction of the CEO, the results of monitoring required by conditions 6 6 and 6-7(4) and the monitoring provided for in the management plan, to the CEO, until such time as the CEO determines that reporting may cease.	days of reporting the cause of exceedance to the CEO). Implement exceedance corrective actions and monitor their effectiveness until the CEO determines the actions may cease. Provide a bi-annual report to the CEO of the monitoring results required by condition 6-6 and 6-7(4) with the baseline data from the supplementary hydrogeological study and include in a bi-annual monitoring report.	CAR.		the CEO the actions to be taken to address the exceedance within seven days of the receipt of the determined cause of exceedance notice.		
1180: M6.8	Hydrogeological management	The proponent shall make the monitoring reports required by condition 6-7(5) publicly available in a manner approved by the CEO.	Provide digital copies of the monitoring reports on the Proponent's website.	Bi-annual monitoring report.	Overall	Within a reasonable timeframe approved by the CEO.	NR	Not Required during the 2023-2024 Reporting Period.
1180: M6.9	Hydrogeological management	Without limiting condition 6-5 (implementation of the plan) and notwithstanding compliance with condition 6-7 (response to exceedance), the proponent must not cause or allow: (1) a failure to implement one or more management actions, if the relevant threshold criteria has been exceeded; (2) the exceedance of a threshold criteria (regardless of whether threshold contingency actions have been or are being implemented); and/or	Implement the Confirmed Hydrogeological Management Plan. Assess implementation of management actions in the CAR. Monitoring of environmental conditions against the trigger criteria.	CAR. HGMP. Monitoring reports (where required).	Overall	Throughout the life of the Project.	NR	Not Required during the 2023-2024 Reporting Period.



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(3) failure to comply with the requirements of the Confirmed Hydrogeological Management Plan.	Compliance Assessment Reporting.					
1180: M6.10	Hydrogeological management	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review and revise the Confirmed Hydrogeological Management Plan and submit to the CEO; and (2) shall review and revise the Confirmed Hydrogeological Management Plan and submit to the CEO as and when directed by the CEO.	Consultation with MAC when revisions to the HMP are made. Written correspondence. Revised version of the HMP will be prepared in consultation with MAC and submitted to CEO and DAWE.	Letter to the CEO and DAWE advising the proponent's proposed changes to the HMP advising changes made at the request of the CEO and the DAWE. Updated and revised version of the HMP Consultation with MAC letter.	Overall	As required by the Proponent or as directed, requested by the CEO or DAWE.	NR	Not Required during the 2023-2024 Reporting Period.
Acid Sulfate Soils Management								
1180: M7.1	Acid sulfate soils	The proponent shall undertake intrusive acid sulfate soils investigations in accordance with the requirements of the Department of Water and Environmental Regulation's guideline on the Identification and investigation of acid sulfate soils and acidic landscapes (DER 2015) at least six months prior to Ground Disturbing Activities.	Contractor / consultant to undertake acid sulfate soils investigations in accordance with the DWER guidelines at least six months prior to GDA's.	Acid sulfate soil survey report. Guideline on the Identification and investigation of acid sulfate soils and acidic landscapes (DER 2015).	Pre-construction	At least six months prior to Ground Disturbing Activities.	C	Tetra Tech Coffey - Detailed Site Assessment for Acid Sulfate Soil dated 19 April 2022. Ground Disturbing Activities (Clearing) commenced July 11, 2023 (PUP2024-003).
1180: M7.2	Acid sulfate soils	In the event that acid sulfate soils are disturbed during the implementation of the proposal, the proponent shall treat and manage acid sulfate soils in accordance with the requirements of the Department of Water and Environmental Regulation's guideline on the Treatment and	Proponent to develop a surface water management plan with inclusions specifying the treatment and management of acid sulfate soils in accordance with the DWER guidelines pursuant to condition 8-2(2), in	Guideline on the Treatment and Management of Soil and Water in Acid Sulfate Soil Landscapes (DER, 2015).	Overall	As required.	C	Following review of the detailed site assessment (Coffey, 2022) it was evident that ASS may be disturbed.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		management of soil and water in acid sulfate soil landscapes (DER, 2015).	case of potential ASS disturbance throughout the life of the proposal. Implementation of the approved Confirmed Surface Water Management Plan.	The Surface Water Management Plan (PCF-PD-EN-SWMP-PCF 3, 9 May 2022).				The proponent has prepared an Acid Sulfate Soils Management Plan (PCF-PD-EN-ASSDMP_PCF1 6 June 2023) in accordance with the Department of Water and Environmental Regulation's guideline on the Treatment and management of soil and water in acid sulfate soil landscapes (DER, 2015).
Surface Water Management								
1180: M8.1	Surface water	The proponent shall implement the proposal to achieve the following environmental objective: (1) maintain the hydrological regimes and quality of surface water so that environmental values are protected.	Implementation of the approved Confirmed Surface Water Management Plan. Defined triggers and thresholds to measure compliance with this condition 8-1.	The Surface Water Management Plan (PCF-PD-EN-SWMP-PCF 3, 9 May 2022).	Overall	Throughout the life of the proposal.	C	Refer to section 4.3 Table 5 of this Report for compliance status against the objective. No non-compliances were identified with this objective.
1180: M8.2	Surface water	At least six months prior to Ground Disturbing Activities within the development envelope delineated in Figure 2, or such lesser time approved in writing by the CEO, the proponent shall in consultation with the Murujuga Aboriginal Corporation, revise and submit to the CEO	Revise and update the current version of the SWMP in consultation with MAC to address all requirements within condition 8-2 and resubmit the SWMP to CEO.	Written correspondence with MAC and DWER. CAR.	Pre-construction	At least six months prior to Ground Disturbing Activities within the development	C	Submission of revised SWMP to CEO 9 May 2022 (PUP2024-009).



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>the Surface Water Management Plan, Perdaman Urea Project Burrup Peninsula, Western Australia (Version PCF 1, 24 January 2021) which shall:</p> <p>(1) demonstrate how the environmental objective in condition 8-1 will be achieved; (2) specify the treatment and management of potential acid sulfate soils in accordance with the requirements of condition 7-1 and condition 7-2; (3) specify trigger criteria that will trigger the implementation of management and/or contingency actions to prevent direct or indirect impacts; (4) specify threshold criteria to demonstrate compliance with condition 8-1; (5) specify monitoring methodology to determine if trigger criteria and threshold criteria have been met; (6) specify management and/or contingency actions to be implemented if the trigger criteria required by condition 8-2(3) and/or the threshold criteria required by condition 8-2(4) have not been met; and (7) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that the objective in condition 8-1 has been met over the reporting period in the Compliance Assessment Report required by condition 15-6.</p>	<p>Submission through DWER.</p> <p>Consult with MAC, in person meeting and consultation.</p> <p>Written evidence of meeting and correspondence with MAC.</p> <p>Written correspondence through the DWER with CEO on approval status of SWMP.</p>	SWMP.		envelope delineated in Figure 2, or such lesser time approved in writing by the CEO.		<p>The SWMP includes all information listed in M 8.2 (1) – (7).</p> <p>Ground Disturbing Activities (Clearing) commenced 11 July 2023 (PUP2024-003).</p>
1180: M8.3	Surface water	The proponent must not commence Ground Disturbing Activities until the CEO has confirmed in writing that the Surface Water Management Plan submitted under	Written Correspondence that the SWMP satisfies the requirements of 8-2 from CEO.	Written correspondence from CEO advising the SWMP satisfies	Pre-construction	Prior to ground disturbing activities.	C	Letter from CEO 13 July 2022 confirming that Surface Water



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		condition 8-2 satisfies the requirements of condition 8-2.		condition requirements of 8-3				Management Plan satisfies condition requirements of 8-2 (PUP2024-009). Ground Disturbing Activities (Clearing) commenced 11 July 2023 (PUP2024-003).
1180: M8.4	Surface water	The proponent shall implement the most recent version of the Confirmed Surface Water Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective detailed in condition 8-1 has been met.	Written correspondence from the CEO through the DWER that the proposal has demonstrated environmental objectives detailed in condition 8-1 have been met.	Written correspondence from CEO advising that the environmental objectives for surface waters have been met.	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 8-1 has been met.	C	All requirements specified in the Confirmed Surface Water Management Plan have been, or are being, fulfilled. The objectives in condition 8-1 required to be implemented are being achieved.
1180: M8.5	Surface water	In the event that the environmental objective in condition 8-1 is not achieved, or monitoring or investigations at any time indicate an exceedance of threshold criteria specified in the Confirmed Surface Water Management Plan the proponent shall: (1) report the exceedance in writing to the CEO within seven days of the exceedance being identified; (2) implement the management and/or contingency actions specified in the Confirmed Surface Water Management Plan as required by condition 8-2(6) within seven days of the exceedances being	Initial written correspondence to the CEO within the required timeframes. c) Within Seven days of an exceedance of threshold criteria being identified; or Written correspondence to CEO and DWER of the management and contingency actions to be implemented within seven days of the exceedance being identified.	Written correspondence to the CEO. Written correspondence to the DWER. Report submitted to the DEO and DWER specifying the input requirements of condition 8-5.	Overall	Report the exceedance in writing to the CEO within seven days of the exceedance being identified; Implement the management and/or contingency actions	NR	No exceedances of the environmental outcomes in condition 8-1 within the Reporting Period.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>reported as required by condition 8-5(1) or such lesser time specified in the Confirmed Surface Water Management Plan and continue implementation of those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the threshold criteria are being met and implementation of the management and/or contingency actions are no longer required;</p> <p>(3) investigate to determine the cause of the threshold criteria being exceeded;</p> <p>(4) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded;</p> <p>(5) provide a further report to the CEO within 21 days of the exceedance being reported as required by condition 8-5(1) and such further report shall include:</p> <p>(a) details of management and/or contingency actions implemented;</p> <p>(b) the effectiveness of the management and/or contingency actions implemented against the threshold criteria;</p> <p>(c) the findings of the investigations required by conditions 8-5(3) and 8-5(4);</p> <p>(d) measures to prevent the threshold criteria being exceeded in the future;</p> <p>(e) measures to prevent, control or abate the environmental harm which may have occurred; and</p> <p>(f) justification of the threshold criteria remaining, or being adjusted based on better understanding, demonstrating that outcomes will continue to be met.</p>	<p>Written correspondence from CEO that it has been demonstrated that trigger criteria and/or threshold criteria are being met and implementation of the management and/or contingency actions are no longer required.</p> <p>Written correspondence in the form of a report to the CEO and DWER within 21 days of exceedance being identified to include:</p> <ul style="list-style-type: none"> • Report of contingency/management actions, preventative measures implemented • Effectiveness of applied management and contingency actions. • Findings of any investigations carried out. • Further measures to prevent future exceedances • Measures to prevent, control or abate the environmental harm which may have occurred • Justifications if trigger and/or threshold values 			<p>specified in the Confirmed Surface Water Management Plan as required by condition 8-2(6) within seven days of the exceedances being reported as required by condition 8-5(1) or such lesser time specified in the Confirmed Surface Water Management Plan.</p>		



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			remain the same or being adjusted.					
1180: M8.6	Surface water	Without limiting condition 8-4 (implementation of the plan) and notwithstanding compliance with condition 8-5 (response to exceedance), the proponent must not cause or allow: (1) a failure to implement one or more management actions, if the relevant threshold criteria has been met; (2) the exceedance of a threshold criteria (regardless of whether threshold contingency actions have been or are being implemented); and/or (3) failure to comply with the requirements of the Confirmed Surface Water Management Plan.	Written correspondence.	Letter to the CEO. CAR.	Overall	Throughout the life of the Project.	NR	No exceedances of threshold criteria within the Reporting Period. All relevant management actions and requirements of the SWMP are being implemented
1180: M8.7	Surface water	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review and revise the Confirmed Surface Water Management Plan and submit it to the CEO; and (2) shall review and revise the Confirmed Surface Water Management Plan and submit it to the CEO as and when directed by the CEO.	Consultation with MAC when revisions to the SWMP are made. Written correspondence. Revised version of the SWMP will be prepared in consultation with MAC and submitted to CEO DWER.	Letter to the CEO advising the proponent's proposed changes to the SWMP or advising changes made at the request of the CEO. Updated and revised version of the SWMP. Consultation with MAC letter	Overall	As required by the Proponent or as directed, requested by the CEO.	NR	No revisions and changes have been made to the SWMP by the proponent or as directed by the CEO during the reporting period.
Cultural Heritage Management								
1180: M9.1	Cultural heritage	The proponent must implement the proposal to meet the following objectives:	Implement the Cultural Heritage Management Plan (CHMP).	Compliance Assessment Report details implementation of	Overall	Throughout the life of the project.	C	Refer to Section 4.3, Table 6 of this CAR for status of compliance with



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>(1) avoid, where possible, and otherwise minimise direct and indirect impacts to social, cultural, heritage, and archaeological values within and surrounding the development envelope;</p> <p>(2) allow ongoing Traditional Owner and Custodian access to enable traditional activities and connection to culturally significant areas within and surrounding the development envelope as shown in Figure 2;</p> <p>(3) allow Traditional Owner and Custodian access to the development envelope following decommissioning of the proposal as shown in Figure 2; and</p> <p>(4) avoid, where possible, and otherwise minimise direct and indirect impacts to visual and amenity impacts to social and cultural places and activities.</p>	<p>Letters of consultation to the Traditional Owner and Custodians allowing access to enable traditional activities and connection to culturally significant areas within and surrounding the development envelope during implementation of proposal and following decommissioning.</p>	<p>the CHMP.</p> <p>Consultation letters.</p>				<p>cultural heritage objectives.</p> <p>No non-compliances were identified with this objective.</p>
1180: M9.2	Cultural heritage	<p>At least six months prior to Ground Disturbing Activities, the proponent shall, in consultation with the Murujuga Aboriginal Corporation and the DPLH, revise and submit to the CEO and the Registrar of Aboriginal Sites a further version of the Aboriginal Heritage Management Plan, Status: Confidential, Perdaman Urea Project Burrup Peninsula, Western Australia (Version PCF 2, 26 March 2021) to meet the objectives specified in condition 9-1 and this plan shall:</p> <p>(1) specify the objectives to be achieved, as specified in condition 9-1;</p> <p>(2) include a framework for consultation with Traditional Owners and Custodians via the Murujuga Aboriginal Corporation</p>	<p>Consultation with MAC, face to face meetings and written correspondence.</p> <p>Consultation with DPLH written correspondence.</p> <p>Revise and submit to the CEO and Registrar of Aboriginal Sites a revised version of the Aboriginal Heritage Management Plan (2021).</p> <p>Revise the Plan and rename it Cultural Heritage Plan in line with references made in conditions 9 - 4.</p>	<p>Consultation Letters with MAC.</p> <p>Consultation correspondence with DPLH.</p> <p>Revised submission of the Cultural Heritage Management Plan. to CEO and the Registrar of Aboriginal Sites on the 11 May 2022.</p> <p>Consultation with MAC during the preparation of the</p>	Pre-construction	At least six months prior to Ground Disturbing Activities.	C	<p>Submission of revised CHMP to CEO on 11 May 2022 and Registrar of Aboriginal Sites on 11 May 2022.</p> <p>The CHMP includes all information as listed in M 9.2 (1) – (9).</p> <p>Ground Disturbing Activities commenced on 11 July 2023 (PUP2024-002).</p>



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>and other relevant stakeholders during the life of the proposal;</p> <p>(3) specify construction environmental management activities relevant to cultural heritage, not limited to and including noise (not limited to and including at Yatha), construction emissions and air quality, traffic management and visual amenity and provide for relevant traditional owners to be invited to observe any Ground Disturbing Activities and during construction, and take reasonable steps to facilitate the observation of those activities by those persons;</p> <p>(4) specify operational environmental management activities relevant to cultural heritage, not limited to and including noise (not limited to and including at Yatha), traffic management and visual amenity and the provision for relevant traditional owners to observe the activities (as reasonably required);</p> <p>(5) specify risk-based management actions that will be implemented to demonstrate compliance with the objectives specified in condition 9-1;</p> <p>(6) specify measurable management target(s) to determine the effectiveness of the risk-based management actions;</p> <p>(7) specify monitoring to measure the effectiveness of management actions against management targets;</p> <p>(8) specify a process for revision of management actions and changes to proposal activities, in the event that the management targets are not achieved, and such process must include an</p>		<p>CHMP was extensive. Consultation is detailed in Section 10 of the CHMP (PCF-PD-EN-CHMP_PCF6, 11 May 2022).</p> <p>Ground Disturbing Activities (Clearing) commenced July 11, 2023. Letter to DCCEEW from the Proponent notifying ground disturbance had commenced (PCF-LTR-DCEEW-00001, 14 July 2023).</p> <p>Revised CHMP was submitted to DWER and Registrar 16 months prior to ground disturbing activities commencing.</p> <p>The following documents have been submitted as evidence for this CAR:</p> <ul style="list-style-type: none"> Letter to DCCEEW from the Proponent 				<p>Plan Submitted 14 months prior to GDA commencing.</p>



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		investigation to determine the cause of the management target(s) not being met; (9) provide the format and timing to demonstrate that condition 9-1 has been met for the reporting period in the Compliance Assessment Report required by condition 15-6 including, but not limited to: (a) verification of the implementation of management actions; and (b) reporting on the effectiveness of management actions against management target(s).		notifying ground disturbance had commenced (PCF-LTR-DCEEW-00001, 14 July 2023).				
1180: M9.3	Cultural heritage	The proponent must not commence Ground Disturbing Activities until the CEO has confirmed in writing that the plan submitted under condition 9-2 satisfies the requirements of condition 9-2.	Written Correspondence that the CHMP satisfies the requirements of 9-3 from the CEO.	Written correspondence from CEO advising the CHMP satisfies condition requirements of 8-3	Pre-construction	Prior to ground disturbing activities.	C	Cultural Heritage Management Plan approved by the CEO on 22 June 2022 (PUP2024-010). Ground Disturbing Activities (Clearing) commenced July 11, 2023 (PUP2024-0002).
1180: M9.4	Cultural heritage	The proponent must implement the most recent version of the Confirmed Cultural Heritage Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated the objectives specified in condition 9-1 have been met.	Written correspondence from the CEO that the proposal has demonstrated that environmental objectives detailed in condition 9-1 have been met.	Written correspondence from CEO advising that the environmental objectives for cultural heritage have been met.	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 9-1 has been met.	C	All requirements specified in the Confirmed Cultural Heritage Management Plan have been, or are being, fulfilled.
1180: M9.5	Cultural heritage	In the event that monitoring, tests, surveys or investigations indicate non-	Written correspondence to the CEO, the MAC, the DPLH and	Monitoring reports/surveys.	Overall	Report submitted	C	Further information is provided in



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		<p>achievement of management target(s) specified in the Confirmed Cultural Heritage Management Plan, the proponent must:</p> <p>(1) report the non-achievement in writing to the CEO, the Murujuga Aboriginal Corporation, the DPLH, and the Registrar of Aboriginal Sites within 21 days of the non-achievement being identified;</p> <p>(2) investigate to determine the cause of the management target(s) not being achieved;</p> <p>(3) provide a further report to the CEO, the Murujuga Aboriginal Corporation, the DPLH, and the Registrar of Aboriginal Sites within 90 days of the non-achievement being reported as required by condition 9-5(1) which must include:</p> <p>(a) a description of the cause of management target(s) being exceeded if known, or analysis of likely causes if not known;</p> <p>(b) the findings of the investigation required by condition 9-5(2);</p> <p>(c) details of revised and/or additional management actions to be implemented to prevent non-achievement of the management target(s); and</p> <p>(d) relevant changes to proposal activities.</p>	<p>the Registrar of Aboriginal Sites of the non-achievement identified.</p> <p>Written report to the CEO, the MAC, the DPLH and the Registrar of Aboriginal Sites with provisions required by 9-5 included.</p>	<p>CAR.</p> <p>Written correspondence (two separate reports) to the CEO, MAC, DPLH and the Registrar.</p>		<p>within 21 days of the non-achievement being identified.</p> <p>Further report within 90 days of the non-achievement being reported.</p>		<p>section 4.3 and Table 6 status of compliance with the CHMP.</p>
1180: M9.6	Cultural heritage	<p>In the event that monitoring, tests, surveys or investigations indicate that one or more management action(s) specified in the Confirmed Cultural Heritage Management Plan have not been implemented, the proponent must:</p> <p>(1) report the failure to implement the management action(s) in writing to the CEO, the Murujuga Aboriginal</p>	<p>Monitor the environmental conditions against the objective in 9-1 to determine non-compliance.</p> <p>Written correspondence (report) to the CEO, MAC, DPLH and the Registrar within seven days of identification.</p>	<p>Written correspondence to the CEO, MAC, DPLH and the Registrar.</p> <p>CAR.</p>	Overall	<p>Report the failure to implement the management action(s) in writing to the CEO, the Murujuga Aboriginal</p>	C	<p>Further information is provided in section 4.3 and Table 6 status of compliance with the CHMP.</p>



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>Corporation, the DPLH, and the Registrar of Aboriginal Sites within seven days of identification;</p> <p>(2) investigate to determine the cause of the management action(s) not being implemented;</p> <p>(3) investigate to determine potential environmental harm or alteration of the environment that occurred due to the failure to implement management action(s);</p> <p>(4) provide a further report to the CEO, the Murujuga Aboriginal Corporation, the DPLH, and the Registrar of Aboriginal Sites within 28 days of the non-compliance being identified, which must include:</p> <p>(a) cause for failure to implement management action(s);</p> <p>(b) the findings of the investigation required by condition 9-6(2);</p> <p>(c) relevant changes to proposal activities; and</p> <p>(d) measures to prevent, control or abate the environmental harm which may have occurred.</p>	<p>Further report to the CEO, MAC, DPLH and the Registrar within 28 days of the non-compliance being identified with provisions required by 9-6 included.</p>			<p>Corporation, the DPLH, and the Registrar of Aboriginal Sites within seven days of identification and provide a further report to the CEO, the Murujuga Aboriginal Corporation, the DPLH, and the Registrar of Aboriginal Sites within 28 days of the non-compliance being identified.</p>		
1180: M9.7	Cultural heritage	<p>Without limiting condition 9-4 (implementation of the plan) and notwithstanding compliance with condition 9-5 (response to exceedance), the proponent must not cause or allow:</p> <p>(1) a failure to implement one or more management actions specified in the Confirmed Cultural Heritage Management Plan, and/or</p> <p>(2) failure to comply with the requirements of the Confirmed Cultural Heritage Management Plan.</p>	Written correspondence.	<p>Letter to the CEO.</p> <p>CAR.</p>	Overall	Throughout the life of the Project.	NR	All relevant management actions are being implemented and the requirements of the CHMP are being complied with



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M9.8	Cultural heritage	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review and revise the Confirmed Cultural Heritage Management Plan and submit it to the CEO; and (2) shall review and revise the Confirmed Cultural Heritage Management Plan and submit it to the CEO as and when directed by the CEO.	Consultation with MAC when revisions to the CHMP are made. Written correspondence. Revised version of the CHMP will be prepared in consultation with MAC and submitted to the CEO.	Letter to the CEO, MAC, DPLH and the Registrar advising the proponent's proposed changes to the CHMP, advising changes made at the request of the CEO. Updated and revised version of the CHMP. Consultation with MAC letter.	Overall	As required by the Proponent or as directed / requested by the CEO.	NR	No revisions and changes have been made to the CHMP during the reporting period.
Light Management								
1180: M10.1	Light management	The proponent shall implement the proposal to meet the following environmental objective: (1) avoid, where possible, and otherwise use best practice technology and risk-based management actions to minimise nightglow and light overspill from the proposal so that the environmental values of amenity at sensitive locations, including, but not limited to Hearson Cove and Deep Gorge, are protected.	Implementation of the approved Confirmed Light Management Plan. Defined triggers and thresholds to measure compliance with this condition 10-1.	LMP	Overall	Throughout the life of the proposal.	C	Evidence summarised within Section 4.3, Table 7 of this CAR with details of compliance with environmental objective. No non-compliances were identified with this objective.
1180: M10.2	Light management	At least six months prior to Ground Disturbing Activities, the proponent shall provide the CEO with a Light Management Plan which has been prepared in consultation with the Murujuga Aboriginal Corporation and that demonstrates that the proposed lighting design adopts best	Develop a Light Management Plan including the required provisions of 10-2 to meet the objective of 10-1. Determination of best practice lighting design and include in the LMP.	LMP. CAR.	Pre-construction	At least six months prior to Ground Disturbing Activities.	C	Light Management Plan was submitted to CEO via email on 9 May 2022 (PUP2024-011).



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>practice lighting control measures to meet the objective in condition 10-1 and which shall:</p> <p>(1) specify best practice technology and risk-based management actions that will be implemented to demonstrate compliance with the objective specified in condition 10-1;</p> <p>(2) specify measurable management target(s) to determine the effectiveness of the best practice technology and risk-based management actions;</p> <p>(3) specify monitoring to measure the effectiveness of best practice technology and management actions against management targets;</p> <p>(4) specify a process for revision of best practice technology and management actions and changes to proposal activities, in the event that the management targets are not achieved, and this process must include an investigation to determine the cause of the management target(s) not being met;</p> <p>(5) provide the format and timing to demonstrate that condition 10-1 has been met for the reporting period in the Compliance Assessment Report required by condition 15-6 including, but not limited to:</p> <p>(a) verification of the implementation of best practice technology and management actions; and</p> <p>(b) reporting on the effectiveness of best practice technology and management actions against management target(s).</p>	<p>Inclusion of the required provisions of 10-2 in the LMP.</p>					<p>Ground Disturbing Activities commenced 11 July 2023 (PUP2024-002).</p> <p>The LMP includes all the information as per M 10.2 (1) – (5). Report was provided to CEO 14 months prior to GDA commencing.</p>



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M10.3	Light management	The proponent must not commence Ground Disturbing Activities until the CEO has confirmed in writing that the Light Management Plan satisfies the requirements of condition 10-2.	Written Correspondence that the LMP satisfies the requirements of 10-2 from the CEO.	Written correspondence from CEO advising the LMP satisfies condition requirements of 10-2.	Pre-construction	Prior to ground disturbing activities.	C	<p>Light Management Plan approved by the CEO on 8 July 2022 (PUP2024-011).</p> <p>Ground Disturbing Activities commenced 11 July 2023 (PUP2024-002).</p> <p>LMP was confirmed in writing by the CEO to have satisfied the requirements of condition requirements of 10-2, twelve months prior to GDA.</p>
1180: M10.4	Light management	The proponent shall implement the most recent version of the Confirmed Light Management Plan.	The latest LMP version to remain implemented during revisions before amendments are made to the newest version to be implemented upon approval by the CEO.	Implementation of the most recently revised version of the LMP.	Overall	Throughout life of the project.	C	<p>All requirements specified in the Confirmed Light Management Plan have been, or are being, fulfilled.</p> <p>The environmental objectives required to be implemented are being achieved.</p>
1180: M10.5	Light management	Without limiting condition 10-4 (implementation of the plan), the proponent must not cause or allow: (1) a failure to implement any best practice technology or management actions	Implement the Confirmed Light Management Plan.	CAR. LMP. Monitoring reports	Overall	Throughout the life of the Project.	NR	All relevant management actions are being implemented and the requirements of



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		specified in the Confirmed Light Management Plan; and/or (2) non-compliance with the requirements of the Confirmed Light Management Plan.	Assess implementation of management actions in the CAR. Monitoring of environmental conditions against the trigger criteria. Compliance Assessment Reporting.	(where required)				the LMP are being complied with
1180: M10.6	Light management	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review and revise the Confirmed Light Management Plan and submit it to the CEO; or (2) shall review and revise the Confirmed Light Management Plan and submit it to the CEO as and when directed by the CEO.	Consultation with MAC when revisions to the CHMP are made. Written correspondence. Revised version of the CHMP will be prepared in consultation with MAC and submitted to the CEO.	Letter to the CEO advising the proponent's proposed changes to the LMP, advising changes made at the request of the CEO. Updated and revised version of the LMP. Consultation with MAC letter.	Overall	As required by the Proponent or as directed / requested by the CEO.	NR	No revisions and changes have been made to the LMP during the reporting period.
1180: M10.7	Light management	The proponent shall continue to implement the latest revision of the Confirmed Light Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental objective detailed in condition 10-1 has been met.	Written correspondence from the CEO that the proposal has demonstrated that environmental objectives detailed in condition 10-1 have been met.	Written correspondence from CEO advising that the environmental objectives for lighting have been met.	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 10-1 has been met.	NR	The Proponent is continuing to implement the most recently approved version of the Light Management Plan.
Offsets Management								



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M11.1	Offsets	The proponent shall contribute funds to the Pilbara Environmental Offsets Fund, (for the implementation of offset projects preferably located in Murujuga) calculated pursuant to condition 11-2, to counterbalance the significant residual impacts to: (1) 'Good' to 'Excellent' condition native vegetation, including foraging and dispersal habitat for the Pilbara olive python, northern quoll, ghost bat and EPBC Act listed migratory/marine bird habitat; and (2) Priority 1 PEC – Burrup Peninsula rock pile communities, which is also critical habitat for the Pilbara olive python and northern quoll.	Monitor the area (hectares) of cleared 'Good' to 'Excellent' condition vegetation. Proponent to contribute payment to the Pilbara Environmental Offsets Funds of the appropriate contribution rate for the applicable financial year (contribution rates will be subject to change for the 2022-2023 financial year in accordance with 11-4) that clearing was undertaken per hectare of 'Good to Excellent' condition native vegetation and conservation significant habitat and Priority 1 PEC – Burrup Peninsula rock pile communities.	Payment contributions to the Pilbara Environmental Offsets Fund at the appropriate contribution rate for the applicable financial year.	Overall	Post clearing works.	C	Initial payment was made within the 2022-2023 reporting period, the Proponent remains compliant with this condition. Consistent with EPBC Approval condition 9(d), The Proponent has provided a payment of 10 per cent of the total contribution to the Pilbara Environmental Offsets Fund, to counterbalance the significant residual impacts to 11-2 (1) and (2). This payment of \$10,605.65 was made on 27 September 2022. (Outside the reporting period).
1180: M11.2	Offsets	The proponent's provisional contribution to the Pilbara Environmental Offsets Fund shall be paid after the conclusion of the biennial reporting period specified in conditions 11-5(4) and 11-5(5), with the provisional amount to be contributed calculated based on the clearing undertaken during that biennial reporting period in accordance with the highest	The proponent must prepare and submit an Impact Reconciliation Procedure to the CEO as per condition 11-5 after the biennial reporting period, which will assist in informing the contribution total to be paid to the Pilbara Environmental Offsets Fund.	Perdaman Urea Project Impact Reconciliation Procedure. Payment contributions to the Pilbara Environmental Offsets Fund at the	Overall	Paid after the conclusion of the biennial reporting period specified in conditions 11-5(4) and 11-5(5).	NR	Biennial Reporting period commenced from date of clearing commencement, which was 11 July 2023, as per correspondence from the Proponent



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		applicable rate specified in condition 11-3 for the relevant type of vegetation.		appropriate contribution rate for the applicable financial year				to DCCEEW in letter (PUP2024-002). First Biennial Reporting Period is therefore 11 July 2023 – 30 th June 2025. Therefore the payment is not due until after the 30 th of June 2025.
1180: M11.3	Offsets	Calculated on the 2019–2020 financial year, the contribution rates are: (1) \$826 AUD (excluding GST) per hectare of 'Good to Excellent' condition native vegetation, including foraging and dispersal habitat for the Pilbara olive python, northern quoll, ghost bat and EPBC Act listed Migratory/marine bird habitat, cleared for the proposal within the Roebourne IBRA subregion within that financial year; and (2) \$1,653 AUD (excluding GST) per hectare of Priority 1 PEC – Burrup Peninsula rock pile communities, which is also critical habitat for the Pilbara olive python and northern quoll (rocky outcrop), cleared for the proposal within the Roebourne IBRA subregion within that financial year.	Payment made to the Pilbara Environmental Offsets Fund in accordance with the applicable contribution rates subject to change each financial year.	Perdaman Urea Project Impact Reconciliation Procedure. Payment contributions to the Pilbara Environmental Offsets Fund at the appropriate contribution rate for the applicable financial year.	Overall	Calculated specific to the financial year that clearing works are undertaken.	C	The Proponent has provided a payment of 10 per cent of the total contribution to the Pilbara Environmental Offsets Fund, to counterbalance the significant residual impacts to 11-2 (1) and (2). This payment of \$10,605.65 was made on 27 September 2022. (Outside the reporting period). Initial payment was made within the 2022-2023 reporting period, the Proponent remains compliant with this condition.



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M11.4	Offsets	The rates in condition 11-3 change annually each subsequent financial year in accordance with the percentage change in the CPI applicable to that financial year.	Determine the contribution rates in accordance with the percentage change in the CPI applicable to the financial year that clearing works commence.	Perdaman Urea Project Impact Reconciliation Procedure. Determined contribution rates to be paid to the Pilbara Environmental Offsets Fund.	Overall	Specific to the financial year that clearing works are undertaken.	NR	This condition has not been triggered in the reporting period. When the payment is made following the First Biennial Reporting Period (11 July 2023 – 30 June 2025), the rates will be calculated for 2023-2025 (years in which clearing was carried out) in accordance with the percentage change in the CPI applicable to that financial year.
1180: M11.5	Offsets	The proponent must prepare and submit a Perdaman Urea Project Impact Reconciliation Procedure to the CEO prior to the Ground Disturbing Activities which must: (1) spatially define the environmental value(s) identified in condition 11-1; (2) spatially define the areas in respect of which offsets required by condition 11-1 are to be calculated; (3) include a methodology to calculate the amount of clearing undertaken during each year of the biennial reporting period for each of the environmental values identified in conditions 11-3(1) and (2); (4) state that the clearing calculation for the first biennial reporting period will commence from the first date of Ground	Prepare and submit an Impacts Reconciliation Procedure to the CEO with provisional requirements of 11-5 included and set out in accordance with the Instructions on how to prepare Environmental Protection Act 1986 Part IV Impact Reconciliation Procedures and Impact Reconciliation Reports.	Perdaman Urea Project Impact Reconciliation Procedure. Instructions on how to prepare Environmental Protection Act 1986 Part IV Impact Reconciliation Procedures and Impact Reconciliation Reports.	Pre-construction	Prior to the Ground Disturbing Activities.	C	The revised Impact Reconciliation Procedure (IRP) was submitted on the 30 March 2022 to the CEO (PUP2024-012). CEO confirmed on 25 May 2022 that the IRP meets the requirements of Condition 11, prior to GDA commencing on the 11 July 2023.



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		Disturbing Activities in accordance with condition 11-2 and end on the second 30 June following the commencement of Ground Disturbing Activities; (5) state that clearing calculations for each subsequent biennial reporting period will commence on 1 July of the required reporting period, unless otherwise agreed by the CEO; (6) indicate the timing and content of the Impact Reconciliation Reports; and (7) be prepared in accordance with Instructions on how to prepare Environmental Protection Act 1986 Part IV Impact Reconciliation Procedures and Impact Reconciliation Reports (or any subsequent revisions).						
1180: M11.6	Offsets	The proponent must not commence Ground Disturbing Activities until the CEO has confirmed by notice in writing that the Impact Reconciliation Procedure satisfies the requirements of condition 11-5.	Written Correspondence that the IRP satisfies the requirements of 11-5 from the CEO.	Written correspondence from CEO advising the IRP satisfies condition requirements of 11-5.	Pre-construction	Prior to ground disturbing activities.	C	IRP confirmed in writing by the CEO on 25 May 2022, advising the IRP satisfies condition requirements of 11-5 (PUP2024-012). Ground disturbing activities commenced on the 11 July 2023 (PUP2024-002).
1180: M11.7	Offsets	The proponent: (1) may review and revise the Confirmed Impact Reconciliation Procedure; or (2) shall review and revise the Confirmed Impact Reconciliation Procedure as and	Written correspondence. Revised version of the IRP will be prepared and submitted to the	Letter to the CEO advising the proponent's proposed changes to the IRP, advising	Overall	As required by the Proponent or as directed / requested by the CEO.	NR	No revisions and changes have been made to the IRP during the reporting period, either by the



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		when directed by the CEO by a notice in writing.	CEO as and when directed by the CEO by a notice in writing. Revise IRP at the commencement of clearing to ensure dates for IRR submission are up to date, in accordance with Condition 11-7. Revise IRP when required by the CEO of EPA.	changes made at the request of the CEO. Updated and revised version of the IRP. Consultation with MAC letter.				proponent or as directed by the CEO
1180: M11.8	Offsets	The proponent shall submit Impact Reconciliation Reports in accordance with the Confirmed Impact Reconciliation Procedure.	Submit Impact Reconciliation Reports as per required timeframe specified in the Impact Reconciliation Procedure.	Confirmed Impact Reconciliation Procedure. Submission of Impact Reconciliation Reports.	Overall	As specified by the IRP. First biennial reporting period 11 July 2023 to 30 June 2025. First Impact Reconciliation Report to be submitted by 30 October 2025.	NR	First biennial reporting period 11 July 2023 to 30 June 2025. First Impact Reconciliation Report to be submitted by 30 October 2025.
1180: M11.9	Offsets	Despite payment of the provisional contribution, the proponent's liability to make a contribution under this condition shall be finally determined: (1) by the Minister upon application by the proponent in writing to the Minister to reduce in part or whole the proponent's liability under this condition where:	Proponent to submit an application to the Minister for exhaustion of liability if conditions of 11-9(a) and 11-9(b) are deemed applicable to the proponent. If no application is made within 12 months of the conclusion of the relevant biennial reporting period, payment will be	Liability reduction application. Written correspondence with the Minister.	Overall	Within 12 months of the conclusion of the relevant biennial reporting period.	NR	First biennial reporting period 11 July 2023 to 30 June 2025. First Impact Reconciliation Report to be submitted by 30 October 2025.



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		(a) a payment has been made to satisfy a condition of an approval under the EPBC Act in relation to the proposal; and/or (b) the payment is made for the purpose of counterbalancing impacts of the proposal on matters of national environmental significance identified in condition 11-1; or (2) to be equivalent to the provisional contribution if no application of the kind described in condition 11-9(1) is made within 12 months of the conclusion of the relevant biennial reporting period.	equivalent to the provisional contribution.					
Environmental Performance Reporting								
1180: M12.1	Environmental performance report	The proponent shall submit an Environmental Performance Report to the Minister and the Murujuga Aboriginal Corporation every five years	Submission of an Environmental Performance Report to the Minister and the MAC.	Environmental Performance Report submitted every 5 years.	Overall	Every five years from commencement of GDA's.	NR	The first Environmental Performance Report is due 11 April 2028.
1180: M12.2	Environmental performance report	The first Environmental Performance Report shall be submitted within three months of the expiry of the five-year period commencing from the first date of Ground Disturbing Activities, or such other time as may be approved by the CEO.	Submission of an Environmental Performance Report to the Minister and the MAC within three months of the expiry of the first five-year period commencing from the first date of GDA's, or such other time as may be approved by the CEO.	Submission of the first Environmental Performance Report.	Overall	Within three months of the expiry of the five-year period commencing from the first date of Ground Disturbing Activities, or such other time as may be approved by the CEO.	NR	Five years from the first date GDA commenced is 11 July 2028. The first report is due 11 April 2028.
1180: M12.3	Environmental	Each Environmental Performance Report shall report on proposal emissions and	Environmental Performance Report to include all provisions of 12-3 in response to monitoring	Environmental Performance Report.	Overall	Every five years from	NR	Five years from the first date GDA commenced is 11



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
	performance report	proposal impacts on the following environmental values: (a) state of rock art; (b) state of human health and amenity affected by proposal air emissions; (c) state of flora and vegetation; (d) state of terrestrial fauna; (e) state of groundwater; (f) state of surface water; (g) state of social surroundings including noise, cultural heritage, traffic and landscape and visual amenity; and (h) state of the holistic environment.	and investigations regarding the applicable environmental values and their condition as per 12-4 over each 5-year period.			commencement of GDA's.		July 2028. The first report is due 11 April 2028.
1180: M12.4	Environmental performance report	The Environmental Performance Report must include: (a) a comparison of the environmental values identified in condition 12-3 at the end of the five-year period; against the state of each environmental value at the beginning of the five year period; (b) a comparison of the environmental values identified in condition 12-3 at the end of the five-year period; against the state of the environmental values identified in first Environmental Performance Report submitted in accordance with condition 12-2; and (c) proposed Adaptive management and continuous improvement strategies.	Each Environmental Performance Report to include all provisions of 12-4 and include comparisons of the state of each environmental value to the first Environmental Performance Report.	Environmental Performance Report.	Overall	Every five years from commencement of GDA's.	NR	Five years from the first date GDA commenced is 11 July 2028. The first report is due 11 April 2028.
1180: M12.5	Environmental performance report	The Environmental Performance Report may be in whole, or part prepared in conjunction with other proponents where there are cumulative impacts from their proposals.	Determine where cumulative impacts from surrounding projects may affect the surrounding environmental values and liaise to prepare the Environmental Performance Report in conjunction with the details of other proponents impacts from their proposals.	Environmental Performance Report.	Overall	Every five years from commencement of GDA's.	NR	Five years from the first date GDA commenced is 11 July 2028. The first report is due 11 April 2028.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
Decommissioning and rehabilitation								
1180: M13.1	Decommissioning and rehabilitation	At least five years prior to the forecasted completion of the operational phase of the proposal the proponent shall prepare and submit a Decommissioning and Rehabilitation Plan to the CEO for approval, on advice of the Murujuga Aboriginal Corporation, Department of Biodiversity, Conservation and Attractions and the DPLH, to meet the following objective: (1) ensure the proposal is decommissioned and rehabilitated in an ecologically sustainable manner.	Prepare and submit a Decommissioning and Rehabilitation Plan to the CEO for approval with inclusion of management actions that ensure the proposal is decommissioned and rehabilitated in an ecologically sustainable manner. Consultation with MAC, DBCA and the DPLH for advice on meeting the environmental objective of 13-1. Written correspondence with MAC, DBCA and the DPLH regarding decommissioning and rehabilitation advice.	Decommissioning and Rehabilitation Plan	Operation	At least five years prior to the forecasted completion of the operational phase of the proposal.	NR	Operations forecasted for completion in the year 2102.
1180: M13.2	Decommissioning and rehabilitation	The proponent must implement the most recent version of the Confirmed Decommissioning and Rehabilitation Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental objective in condition 13-1 has been met.	Written correspondence from the CEO that the proposal has demonstrated that environmental objectives detailed in condition 13-1 have been met.	Written correspondence from CEO advising that the environmental objectives for decommission and rehabilitation have been met.	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 13-1 has been met.	NR	Operations forecasted for completion in the year 2102.
1180: M13.3	Decommissioning and rehabilitation	After the submission of the Decommissioning and Rehabilitation Plan, the proponent is to include an update on the forecasted completion of the operational phase and decommissioning of the proposal in each subsequent Compliance Assessment Report required by condition 15-6.	Update the forecasted completion of operations in each subsequent CAR from the submission of the Decommissioning and Rehabilitation Plan.	Forecasted operation completion date in the CAR.	Overall	After the submission of the Decommissioning and Rehabilitation Plan.	NR	Operations forecasted for completion in the year 2102.



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M13.4	Decommissioning and rehabilitation	The proponent, in consultation with the Murujuga Aboriginal Corporation, the Department of Biodiversity, Conservation and Attractions and the DPLH: (1) may review and revise the Confirmed Decommissioning and Rehabilitation Plan and submit it to the CEO; and (2) shall review and revise the Confirmed Decommissioning and Rehabilitation Plan and submit it to the CEO as and when directed by the CEO by a notice in writing.	Consultation with MAC when revisions to the Confirmed Decommissioning and Rehabilitation Plan are made. Written correspondence. Revised version of the Confirmed Decommissioning and Rehabilitation Plan will be prepared in consultation with MAC and submitted to the CEO.	Letter to the CEO advising the proponent's proposed changes to the LMP, advising changes made at the request of the CEO. Updated and revised version of the Confirmed Decommissioning and Rehabilitation Plan. Consultation with MAC letter.	Overall	As required by the Proponent or as directed / requested by the CEO.	NR	Operations forecasted for completion in the year 2102.
Time Limit for Proposal Implementation								
1180: M14.1	Time limit for proposal implementation	The proponent shall not commence implementation of the proposal after five years from the date of this Statement, and any commencement, prior to this date, must be substantial.	Implementation of the proposal must occur within 5 years of the issue of Ministerial Statement No. 1180. Implementation that is to occur prior to this date must be substantial (in substantial motion).	Implementation of the proposal.	Overall	By 24 January 2027.	C	Implementation of the proposal began with the relocation of heritage items in April 2023 and on the 11 July 2023 clearing commenced (PUP2024-002).
1180: M14.2	Time limit for proposal implementation	By the date that is five years from the date of this Statement, the proponent shall notify the CEO in writing of the date of substantial commencement of the proposal, together with reasons why that date has been selected.	Notify the CEO in writing of the date of substantial commencement and the reasoning behind selection of this date.	Correspondence in writing of substantial commencement date and reasons for selected date to the CEO by the proponent.	Overall	By 24 January 2027.	NR	Clearing commenced 11 July 2023, with bulk earthworks progressing during the reporting period. Substantial commencement of the proposal is



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								considered to be at the time bulk earthworks is complete and civil construction will commence, expected to be mid-2024, The CEO will be notified of substantial commencement at this time.
Compliance Reporting								
1180: M15.1	Compliance reporting 1	The proponent shall prepare, and maintain a Compliance Assessment Plan, which is submitted to the CEO at least six months prior to the first Compliance Assessment Report required by condition 15-6, or prior to Ground Disturbing Activities, whichever is sooner.	Prepare CAP (this document) in accordance with approval and guideline requirements.	Approved CAP. DWER approval of CAP.	Pre-construction	At least six months prior to the first Compliance Assessment Report required by condition 15-6, or prior to Ground Disturbing Activities, whichever is sooner.	CLD	Compliance Assessment Plan submitted to the CEO on 12 February 2022. Compliance Assessment Plan approved by the CEO on 17 March 2022. The CAP was sent to the CEO 14 months prior to the first CAR being required.
1180: M15.2	Compliance reporting 2	The Compliance Assessment Plan shall indicate: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments;	Prepare CAP (this document) in accordance with approval and guideline requirements.	Approved CAP. DWER approval of CAP.	Overall	Annually from the date of submission of the first Compliance Assessment Report (condition 15-	CLD	Compliance Assessment Plan submitted to the CEO on 12 February 2022 (PUP2024-013).



AUDIT TABLE

PROPOSAL: Perdaman Urea Project

STATEMENT: 1180

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.				6), or at another time agreed in writing by the CEO.		Compliance Assessment Plan approved by the CEO on 17 March 2022 (PUP2024-013) and determined to meet the requirements of condition 15-2 (this condition).
1180: M15.3	Compliance reporting	The proponent shall assess compliance with conditions in accordance with the Confirmed Compliance Assessment Plan.	This CAP and this Audit Table Template completed with status (Appendix A to the CAP). CAR prepared in accordance with approved CAP.	Submission of CAR to CEO. Audit Table.	Overall	Annually from the date of submission of the first Compliance Assessment Report, or at another time agreed in writing by the CEO.	C	This CAR (PCF-PD-EN-CAR_2024) has been prepared in accordance with the Confirmed Compliance Assessment Plan.
1180: M15.4	Compliance reporting	All Compliance Assessment Reports shall be retained until the Proposal is fully implemented (including decommissioning and rehabilitation) or such other period agreed in writing by the CEO.	All CARs shall be retained for a minimum of seven years following the end of the life of the proposal.	Compliance Assessment Reports retained.	Overall	Until the Proposal is fully implemented (including decommissioning and rehabilitation) or such other period agreed in writing by the CEO.	C	This CAR (PCF-PD-EN-CAR_2024) and the CAR from previous reporting period (PCF-PD-EN-CAR_2023) are retained on the Projects SharePoint electronically. The CAR's will be retained within the Electronic system for the life of the Project, or such other period agreed by the CEO.



AUDIT TABLE

PROPOSAL: Perdaman Urea Project

STATEMENT: 1180

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M15.5	Compliance reporting	The proponent shall advise the CEO of any potential non-compliance within seven days of that non-compliance being known to the proponent.	Proponent to notify in writing of any potential non-compliance to the CEO.	Written correspondence to the CEO.	Overall	Within seven days of that non-compliance being known to the proponent.	NC	<p>The non-compliances declared in this CAR (Conditions 3-6, 3-11, and 15-6) were not reported to the CEO within seven days of the non-compliance being known to the proponent.</p> <p>Condition 3-6 Non-Compliance: Confirmation that the GHGMP (Version PCF 5, 4 March 2022) satisfied the requirements of condition 3-3 was provided to the Proponent on the 17 May 2022.</p> <p>The GHGMP was not published on the Website in the timeframe required by condition 3-6) during this reporting period (i.e. two weeks from approval date).</p> <p>Condition 3-11 Non-Compliance: The GHGMP was not published on the</p>



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								<p>Website in the timeframe required by condition 3-11(2) during this reporting period (i.e. two weeks from approval date).</p> <p>Condition 15.6 Non-Compliance The first annual CAR was due on the 24 April 2023 and was submitted 26 April 2023. This non-compliance was identified by DWER and Perdaman was sent a letter by DWER, of missing the due date of 24 April 2023.</p> <p>None of the above non-compliances were notified to the CEO within the seven-day reporting period.</p>
1180: M15.6	Compliance reporting	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen months from the date of issue of this Statement addressing the twelve-month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or at another time agreed in writing by the CEO.	<p>Submit to the CEO the first CAR fifteen months from the date of issue of Ministerial Statement No. 1180.</p> <p>Submit to the CEO subsequent CAR's annually from the first CAR submitted.</p>	Submission of Compliance Assessment Reports to CEO.	Overall	By 24 April 2023 and then annually from the date of submission of the first Compliance Assessment Report, or at	NC	<p>First CAR was submitted to DWER (EPA) on 26 April 2023, 2 days overdue.</p> <p>As above, this non-compliance was identified by DWER</p>



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
						another time agreed in writing by the CEO.		and Perdaman was sent a letter by DWER, of missing the due date of 24 April 2023.
1180: M15.7	Compliance reporting	Each Compliance Assessment Report shall: (1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf; (2) include a statement as to whether the proponent has complied with the conditions; (3) identify all potential non-compliances and describe corrective and preventative actions taken; (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 15-2.	CEO or representative of the CEO to endorse each CAR. CAR to include statement regarding whether proponent has complied with Ministerial Statement 1180 conditions, identifying all potential non-compliances and description of preventative actions to be taken if non-compliances are identified. The CAP must be revised to reflect any changes made to the Proposal and changes to conditions within MS 1180. All CARs to be made publicly available through the Perdaman Project Destiny webpage within a reasonable time frame following completion of the report.	Public approval / endorsement of each CAR. Contents of each CAR. OEPA's Post Assessment Guideline No. 4 – Post Assessment Guideline for Making Information Publicly Available	Overall	Annually from the date of submission of the first Compliance Assessment Report, or at another time agreed in writing by the CEO.	C	2022-2023 CAR (PCF-PD-EN-CAR_2023) Signed / Endorsed by Vikas Rambal Chairman of The Proponent and includes a statement of Compliance. No potential NC's were identified. CAR (PCF-PD-EN-CAR_2023) is publicly available at https://www.perdamanindustries.com.au/wp-content/uploads/2023/08/Compliance-Assessment-Report-April-2023.pdf No changes to the CAP were proposed in the CAR (PCF-PD-EN-CAR_2023) as per section 4 of the CAR (2023).



AUDIT TABLE

PROPOSAL: Perdaman Urea Project

STATEMENT: 1180

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M15.8	Compliance reporting	The proponent: (1) may review and revise the Confirmed Compliance Assessment Plan; and (2) shall review and revise the Confirmed Compliance Assessment Plan as and when directed by the CEO.	Revised version of the CAP will be prepared and submitted to the CEO.	Confirmed Compliance Assessment Plan	Overall	As and when directed by the CEO.	NR	No revisions and changes have been made to the CAP during the reporting period.
1180: M15.9	Compliance reporting	The proponent shall implement the latest revision of the Confirmed Compliance Assessment Plan.	The latest CAP version to remain implemented during revisions before amendments are made to the newest version to be implemented upon approval by the CEO.	Implementation of the most recently revised version of the CAP.	Overall	From the date of submission of the first Compliance Assessment Report, or at another time agreed in writing by the CEO.	C	Confirmed Compliance Assessment Plan approved by the CEO on 17 March 2022 remains the CAP being implemented during the reporting period.
Public Availability of Data								
1180: M16.1	Public availability of data	Subject to condition 16-2, 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), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	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), management plans and reports relevant to the assessment of this proposal and implementation of Ministerial Statement No. 1180.	Public availability of data relevant to the proposal	Overall	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.	C	Several plans are publicly available on the Proponents website. All other revised management plans and reports relevant to the assessment of this proposal and implementation of this Statement are available by request, as stated on the proponents website.
1180: M16.2	Public availability of data	If any data referred to in condition 16-1 contains particulars of: (1) a secret formula or process; or (2) confidential commercially sensitive information;	Submission of a request for approval from the CEO to not make sensitive or secret data publicly available, providing	Request submitted to the CEO justifying exclusion of relevant documents to public platforms.	Overall	At the discretion of the CEO.	NR	The proponent has not submitted a request to the CEO for approval to not make these plans,



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		the proponent may submit a request for approval from the CEO to not make these 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.	justification as to why the approval is being sought.	Written correspondence between the proponent and the CEO.				data and reports available to the public during the reporting period.

C. Appendix C – Supporting / Verifying Information

Table 12 Supporting/Verifying Information

Type of Information	Document Code	Document Title / Information description.
Figure (Map)	PUP2024-001	Project Environmental Approval Boundaries - Figure 01B. This figure demonstrates Development Envelope Extent.
Excel Register	PUP2024-002	Ground Disturbance Permit Register 45826-HSE-REG-G-1001_GDP.
Letter	PUP2024-003	Letter from Perdaman to DCCEEW notifying that GDA had commenced 11/07/2023. Letter dated 14 July 2023 (PCF-LTR-DCCEEW-00001).
Letter	PUP2024-004	Confirmed GHGMP Approval Letter from CEO dated 17 May 2022 - (via Letter Your ref: PCF-PD-EN-GHGMP Our ref: DWERVT9522).
Figure (Map)	PUP2024-005	Proposal Clearing extents. This figure demonstrates the proposal clearing extents undertaken to date under the Proposal.
Letter	PUP2024-006	Confirmed Flora Management Plan Letter Approved from DWER to Perdaman (DWER REF: DWERVT95020. Dated 11/03/2022).
Letter	PUP2024-007	Confirmed Fauna Management Plan Letter Approved from DWER to Perdaman (DWERVT9574) (Dated 7 July 2022).
Letter	PUP2024-008	Confirmed Threatened Species Management Plan Letter Approved from DCCEEW to Perdaman (26 February 2022) <i>Note: the Plan was approved by the Delegate to the Minister within the EPBC Approval Conditions.</i>
Letter	PUP2024-009	Confirmed Surface Water Management Plan Letter Approved from DWER to Perdaman (Your Ref: PCF-PD-EN-SWMP) (Our Ref: DWERVT9523) (13 July 2022).
Letter	PUP2024-010	Confirmed Cultural Heritage Management Plan Letter Approved from DWER to Perdaman (Your Ref: PCF-PD-EN-CHMP (Our Ref: DWERVT9764-2). 22 June 2022.
Letter	PUP2024-011	Confirmed Light Management Plan Letter Approved from DWER to Perdaman (Your Ref: PCF-PD-EN-LMP Our ref: DWERVT9572) 08 July 2022.
Letter	PUP2024-012	MINISTERIAL STATEMENT 1180 – IMPACT RECONCILIATION PROCEDURE – APPROVED from DWER to Perdaman (Our Ref: DWERVT9644 Your Ref: PCF-PD-EN-IRP Rev 1) 25 May 2022.
Letter	PUP2024-013	MINISTERIAL STATEMENT 1180 - PERDAMAN UREA PROJECT - APPROVAL OF COMPLIANCE ASSESSMENT PLAN (Our ref: DWERVT9465) 17 March 2022.

Please note this information can be supplied to DWER, if requested, to verify compliance with the above MS conditions.

Each page (including Appendices) must be initialled by the person who signs Section 4 of this Statement of Compliance.

INITIALS: