



PERDAMAN
INDUSTRIES

CHEMICALS & FERTILISERS

EPBC 2018/8383

Annual Compliance Report

11 July 2023 – 10 July 2024

Perdaman Urea Project

Burrup Peninsula, Western Australia
PCF-PD-EN-ACR



Approval holder:

Perdaman Chemicals and Fertilisers Pty Ltd

ABN: 31 121 263 741

Date: 03 October 2024

EPBC Approval 2018/8383



PERDAMAN
INDUSTRIES

CHEMICALS & FERTILISERS

Contact Information

Perdaman Chemicals and Fertilisers Pty Ltd
ABN 31 121 263 741

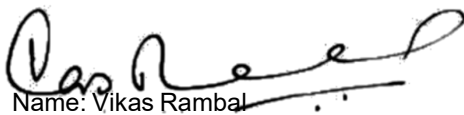
58 Mounts Bay Road
Perth
WA 6000
Australia

www.perdaman.com.au
Phone +61 8 9429 5111
Fax +61 8 9429 5100

Document Information

Project Name: Perdaman Urea Project
File Reference: PCF-PD-EN-ACR_2023-24
Job Reference PCF-PD
Date: 03 October 2024

Approved By:



Name: Vikas Rambal

Job title: Chairman

Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed  _____

Full name (please print) Vikas Rambal

Position (please print) Chairman

Organisation (please print including ABN/ACN if applicable) Perdaman Chemicals and Fertilisers

Date 03/10/2024

Document Version Control

Revision	Date	Information	Prepared by	Reviewed/Approved
Rev A	18 September 2024	Draft ACR prepared for Client review	Saipem Clough Joint Venture	Damon Carter (Perdaman)
Rev	03 October 2024	Final ACR for DCCEEW	Saipem Clough Joint Venture	Damon Carter (Perdaman)

Contents

1	Introduction	5
1.1	Project Background.....	5
1.2	Description of Activities.....	5
1.3	Commencement of the Action.....	6
1.3.1	Description of Activities undertaken during the reporting period.....	6
2	Environmental Risk	6
3	Other information	7
4	Compliance Summary	7
4.1	Compliance Status Terms.....	7
4.2	Compliance Table.....	8
4.3	Correcting Non-Compliances	35
5	Implementation Summaries – Environmental Management Plans	37
5.1	Implementation Summary – Threatened Species Management Plan (PCF-PD-EN-TSMP_PCF5, 23 February 2022).....	37
5.2	Implementation Summary – Cultural Heritage Management Plan (PCF-PD-EN-CHMP_PCF6,11 May 2022) and (PCF-PD-EN-CHMP_PCF8,9 February 2024).....	121
5.3	Implementation Summary – Air Quality Management Plan (Final Version PCF 2, 25 March 2021) 155	
5.4	Implementation Summary – Impact Reconciliation Procedure (PCF-PD-EN-IRP_Rev 1, 21 March 2022) (SCJV, 2022)	156
A.	Appendix A – Supporting / Verifying Information.....	162

1 Introduction

This annual report has been compiled to fulfill the reporting requirements of Perdaman Chemicals and Fertilisers Pty Ltd, the approval holder of the EPBC 2018/8383 Approval.

The Perdaman Urea Project (Project Ceres) was approved under section 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 26 February 2022 (2018/8383) and involves the construction and operation of a urea plant and associated infrastructure on the Burrup Peninsula, Western Australia. Clearing activities commenced for the proposed action on 11 July 2023, with formal notification via letter provided to Department of Climate Change, Energy, the Environment and Water (DCCEEW) on 14 July 2023. The reporting period for this compliance report is from the commencement of the action **11 July 2023 to 10 July 2024**.

This report fulfils the requirements for annual compliance reporting as described in EPBC 2018/8383.

1.1 Project Background

Perdaman Fertilisers and Chemicals Pty Ltd (Perdaman) is the approval holder for the Perdaman Urea Project (the 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.

1.2 Description of Activities

Item	Description
EPBC Number	2018/8383
Project Name	Perdaman Urea Project (Project Ceres)
Approval Holder and ACN	Perdaman Chemicals and Fertilisers Pty Ltd 121 263 741
Approved action	To construct and operate a urea plant and associated infrastructure on the Burrup Peninsula, Western Australia [See EPBC Act referral 2018/8383, the variation accepted on 26 July 2019 and the variation request accepted on 10 February 2021].
Location of the project	Burrup Peninsula, Near Karratha, Western Australia
Person accepting responsibility for this report	See declaration of accuracy below
Compliance Reporting Period	11 July 2023 to 10 July 2024.

Date of preparation of report

03/10/2024

1.3 Commencement of the Action

The Commonwealth Approval definition for the Commencement of the Action has the meaning,

*the first instance of any specified activity associated with the action including **clearing and construction**. Commencement of the action does not include minor physical disturbance necessary to:*

- a) *undertake pre-clearance surveys or monitoring programs;*
- b) *install signage and /or temporary fencing to prevent unapproved use of the project area;*
- c) *protect environmental and property assets from fire, weeds and pests, including installation of temporary fencing, and use of existing surface access tracks; and*
- d) *install temporary site facilities for persons undertaking pre-commencement activities so long as these are located where they have no impact on the protected matters.*

The Approval holder has commenced the action, in the form of clearing on the 11 July 2023, however during the 11 July 2023 to 10 July 2024 reporting period, the action (under EPBC 2018/8383) has not been implemented in full.

1.3.1 Description of Activities undertaken during the reporting period

The Proposal is in the pre-construction phase with the removal of heritage artifacts, fauna trapping and translocation, vegetation clearing and grubbing, blasting, crushing and screening materials, bulk earthworks, commencement of civil and underground works and construction of temporary laydowns and the realignment of Hearson Cove Road having been undertaken and/or commenced during the reporting period.

Within the period 11 July 2023 to 10 July 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, in the form of clearing of native vegetation, commenced on 11 July 2023.

No Operational elements have commenced during the reporting period. Clearing commenced on 11 July 2023 for the Hearson Cove Road realignment. Clearing started on Site C 29 September 2023, with Site F clearing commencing on 2 October 2023. No activities within the Portside area commenced within the reporting period.

2 Environmental Risk

The following environmental risks were identified during the reporting period:

- Night works for general construction activities have been identified as being required. These have been identified during the reporting period, however, did not commence during the reporting period. There has been risk analysis completed by an independent ecologist, consultation with MAC and the Threatened Species Management Plan has been updated (awaiting approval by DCCEE since Feb 2024).

3 Other information

The Red Dwarf Honeybee has been identified in increasing numbers onsite during the reporting period, which is a declared pest species. The Project has been consulting with DPIRD regarding the pest. The project presents no risk of spreading the pest as no vegetation was removed from site (all buried), and all sightings are reported to DPIRD as per their request - the project is assisting DPIRD in this matter. The Project is within the quarantine zone and the species is being controlled and managed in accordance with DPIRD regional manager directions and advice.

4 Compliance Summary

4.1 Compliance Status Terms

Compliance status terms are provided in Table 1.

Table 1 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.	Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Non-Compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	A designation of 'non-compliant' must be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not Applicable	NA	The requirements of the audit element were not triggered during the reporting period or Not applicable during the reporting period.	A designation of 'not applicable' must be given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition that applies to an activity that has not yet commenced.

4.2 Compliance Table

The Compliance Table is provided in Table 2 below.

Table 2 - Conditions Compliance Status

Condition No.	Condition	Status	Evidence / Justification / Comments
Part A – Conditions Specific to the action			
1.	To avoid and mitigate impacts to protected matters, the approval holder must not clear outside the disturbance footprint and must comply with Conditions 1, 4-1 and 5 of the Western Australian Approval.	Compliant	<p>No clearing outside the disturbance footprint has occurred during the reporting period. Refer to PUP_ACR2024-003 for clearing to date against the clearing footprint, Figure 01B Project Environmental Approval Boundaries (PUP_ACR2024-001) and the Ground Disturbance Register Clearing Data Screenshot (PUP_ACR2024-002).</p> <p>During the reporting period Compliance with condition 1 of the Western Australian Approval was met and is captured in the MS 1180 CAR Period 2023-2024. Refer to PUP_ACR2024-008.</p> <p>During the reporting period Compliance with condition 4-1 of the Western Australian Approval was met and is captured in the Map of Clearing extents (PUP_ACR2024-003) and Ground Disturbance Register Clearing Data Screenshot (PUP_ACR2024-002) the Ministerial Statement 1180 Compliance Assessment Report PUP_ACR2024-008 and PUP_ACR2024-009 (Letter submitting the CAR).</p> <p>During the reporting period Compliance with condition 5 of the Western Australian Approval was met and is captured in the Ministerial Statement 1180 Compliance Assessment Report (PUP_ACR2024-008) and in the Map of Clearing extents (PUP_ACR2024-003) and Ground Disturbance Register Clearing Data Screenshot (PUP_ACR2024-002).</p>
2.	To avoid and mitigate impacts to protected matters, the approval holder must implement the approved Threatened Species Management Plan, or a	Compliant	<p>The approved Threatened Species Management Plan PCF-PD-EN-TSMP, version PCF 5, 23 February 2022) was implemented during the reporting period.</p> <p>On the 7 February 2024, Perdaman revised the confirmed</p>

Condition No.	Condition	Status	Evidence / Justification / Comments
	subsequently revised version approved by the Minister.		<p>Threatened Species Management Plan PCF-PD-EN-TSMP (TSMP), version PCF 6 to version <i>Draft Threatened Species Management Plan, PCF-PD-EN-TSMP, PCF 6, 18 December 2023</i> and submitted to DCCEEW (PUP_ACR2024-017), to include provision for night works. To date the revised TSMP (version 6) has not been reviewed by DCCEEW.</p> <p>The <i>EPBC Act</i> allows revised plans to be implemented without approval by the Minister, provided that the proposed changes are unlikely to have a new or increased impact on matters protected under the approval.</p> <p>It is noteworthy that the changes proposed in the Revised Management Plan are unlikely to present a new or increased impact, and therefore the Revised Management Plan does not require <i>approval through Section 143A of the EPBC Act according to the Guidance on 'new or increased impact' relating to changes to approved management plans under EPBC Act environmental approvals</i> (Commonwealth of Australia, 2017). However, DCCEEW post-assessment officers advised Perdaman that referral for approval should be carried out as it is a condition of the EPBC Approval 2018/8383 to seek approval for a change to management action from the Minister or delegate. Perdaman therefore awaits DCCEEW to confirm their satisfaction that the changes present no new or increased risk and the independent ecologist assessment that the Revised Management Plan addresses any and all risks to threatened species (Refer to Letter evidence (PUP_ACR2024-017).</p> <p>Refer to Threatened Species Management Plan Implementation Summary in Table 4.</p>
3.	In the event that the approval holder becomes aware of any exceedance of a threshold criterion specified in the Threatened Species Management Plan, the approval holder must:	-	There were two exceedances of threshold criteria within the reporting period.

Condition No.	Condition	Status	Evidence / Justification / Comments
3.a.	Undertake the actions required under condition 5-6 of the Western Australian Approval and included an assessment of any impact(s) to protected matters arising from the exceedance.	Not Applicable	There were two exceedances of threshold criteria within the reporting period, therefore actions required under condition 5-6 of the Western Australian Approval were required to be implemented. However these were identified outside the reporting period during the preparation of this report. The Approval Holder will implement the requirements of condition 5-6 and report in the next reporting period ACR.
3.b.	Within 6 months of any exceedance of a threshold criterion, submit to the Department for the Minister's approval a Remediation Plan for any impact(s) to protected matters arising from the exceedance as detailed in the report required under condition 5-6(5) of the Western Australian Approval, that has been reviewed by an independent suitably qualified expert.	Not Applicable	The exceedances of threshold criteria within the reporting period were only identified during the preparation of this ACR, therefore the requirement for the submission of a Remediation Plan was not triggered during this reporting period.
3.c.	If the Minister determines that it is not possible to remediate the impact(s) of one or more exceedance, then the approval holder must submit an Offset Strategy for the Minister's approval, within 10 months of exceedance of the threshold criterion. The offset strategy must specify how the impact(s) will be offset in accordance with the requirements of the Environmental Offsets Policy.	Not Applicable	This requirement for the submission of an Offset Strategy was not triggered during the reporting period.
3.d.	If the Offset Strategy has not been approved by the Minister in writing within 11 months of any exceedance of a threshold criterion,	Not Applicable	This requirement was not triggered during the reporting period.

Condition No.	Condition	Status	Evidence / Justification / Comments
	and the Minister notifies the approval holder that the Offset Strategy is not suitable for approval, the Minister may approve a version of the Offset Strategy revised by the Department. The approval holder must implement the approved Offset Strategy for the life of the project.		
4.	To minimise impacts on the National Heritage listed – Dampier Archipelago (Burrup Peninsula), the approval holder must:	Not Applicable	-
4.a.	comply with condition 1 of the Western Australian Approval to ensure no Aboriginal Cultural Heritage Sites other than the Three Aboriginal Cultural Heritage Sites within the development envelope are directly impacted	Compliant	<p>Compliance with condition 1 of the Western Australian Approval was met during the reporting period and is captured in the Annual Report to Registrar of Aboriginal Sites PUP_ACR2024-013 for the period between January 27, 2023, through to 26 January 2024. Figure (PUP_ACR2024-004) identifies the three Aboriginal Cultural Heritage Sites.</p> <p>The three (3) Aboriginal Cultural Heritage sites within the PDE were salvaged and relocated in accordance with consultation Perdaman undertook with MAC and the Circle of Elders whereby endorsement and approval for sites ID 19874, ID 186515, ID 19239 to be relocated to Reserve 43195 was provided. This action occurred outside the reporting period for this ACR.</p> <p>No disturbance or further impacts occurred to these three sites or any other Aboriginal Cultural Heritage Sites during the ACR reporting period 11 July 2023 to 10 July 2024.</p>
4.b.	ensure there are no direct and indirect impacts to the Fish Thalu Aboriginal Heritage Site from changes in tidal water flow movements within the King Bay / Hearson Cove supratidal to intertidal flat area due to the	Compliant	<p>The causeway has been designed to allow for continued flow through the supratidal flat at a rate of no greater than 1.0m/s. The causeway is unlikely to impact on the Fish Thalu Aboriginal heritage site, as it will not materially impede tidal water flow movements within the King Bay /Hearson Cove supratidal to intertidal flat area, including during storm surge events from King</p>

Condition No.	Condition	Status	Evidence / Justification / Comments
	development and use of the causeway; and		<p>Bay. Similarly, the causeway design will not promote flooding in the supratidal flat east of the causeway, as it will not impede the flow from Hearson Cove westwards into King Bay.</p> <p>A bed and banks permit under the RIWI Act 1914 was issued for the development. The Permit under section 17 includes the condition: <i>“The permit holder shall ensure that the works does not act as an artificial barrier or levee, causing water to pond upstream”</i>. This condition further protects the Fish Thalu Aboriginal Heritage Site.</p> <p>Monitoring of the impacts to the Fish Thalu Aboriginal Heritage Site and tidal flows will be carried out through the surface water monitoring program, detailed within the Confirmed Surface Water Management Plan. Monitoring of the culvert flow velocities using a flow probe to ensure that outflow velocities are less than 1m/s is carried out as part of this Program.</p> <p>The causeway was still under construction during the reporting period.</p> <p>An internal SCJV site audit was undertaken on 25 to 26 June 2024 and confirmed no direct or indirect impacts were observed to the Fish Thalu Aboriginal Heritage Site due to the construction of the causeway.</p> <p>Further, periodic reviews of aerial imagery of the area (via GIS systems) within the reporting period did not observe any direct or indirect impacts to the area.</p>
4.c.	not impact more than 0.97 hectares of the National Heritage listed – Dampier Archipelago (Burrup Peninsula).		<p>During the reporting period a total of 0.78 hectares was cleared of the National Heritage listed – Dampier Archipelago. This is captured within PUP_ACR2024-005.</p> <p>0.78 ha is less than 0.97 ha authorised amount.</p>
5.	To minimise impacts on the National Heritage listed – Dampier Archipelago (Burrup Peninsula), the approval holder must comply with condition 9 of the Western	Compliant	<p>A Cultural Heritage Management Plan (PCF-PD-EN-CHMP-PCF6) has been developed and was implemented during the reporting period. The Plan was approved for implementation and meeting the requirements of condition 9 of the MS 1180 on the 22 June 2022 by the CEO (PUP_ACR2024-006).</p>

Condition No.	Condition	Status	Evidence / Justification / Comments
	Australian Approval to develop and implement a Cultural Heritage Management Plan. In addition, the approval holder must:		<p>On the 9 February 2024 Perdaman notified the DCCEEW and DWER (PUP_ACR2024-014) that the CHMP (rev 6) was revised based on identifying a required change to Management Action 21 within the CHMP in order to prevent a potential non-achievement (NB a non-achievement had not occurred). In accordance with condition 9-8 (1) of MS1180 (WA Approval), Perdaman may review and revise the confirmed CHMP (PFC6) in consultation with MAC and is only required to submit to the CEO. Approval of the revised CHMP is not required. The Plan was submitted on the 22 March 2024 (PUP_ACR2024-015).</p> <p>CHMP PCF8 was in effect from the 8 February 2024, with all changes outlined within the letter provided to the department in the notification of a revision (PUP_ACR2024-014).</p> <p>Refer to section 5.2 of this report for the implementation summary of Cultural Heritage Management Plan (PCF6) and the revised PCF 8 during the reporting period.</p>
5.a.	provide a complete copy of the Cultural Heritage Management Plan to the Department within 10 business days of the approval of any revised version by the CEO;	Compliant	<p>On the 9 February 2024 Perdaman notified DCCEEW and EPA (PUP_ACR2024-014) that the CHMP (rev 6) was revised to PCF8, in accordance with condition 9-8(1) the MS1180, approval is not required just submission of the revised Plan. The DCCEEW was notified the same day as EPA and therefore within 10 business days.</p>
5.b.	provide any reports required to be prepared under conditions 9-5 and 9-6 of the Western Australian Approval to the Department for review within the same timeframes specified in those conditions; and	Not Applicable	<p>During the reporting period, the monitoring, tests, surveys and investigations did not indicate that management actions or management targets specified within the Confirmed Cultural Heritage Management Plan (PCF6 and PCF8) had not been implemented.</p> <p>Therefore, no reports were required to be provided to the Department during the reporting period.</p> <p>Refer to section 5.2 of this document for the Cultural Heritage Management Plan (Rev 6) implementation summary for the</p>

Condition No.	Condition	Status	Evidence / Justification / Comments
			reporting period.
5.c.	if a non-achievement of a management target or management action, as set out in Cultural Heritage Management Plan, is identified:	Not Applicable	This condition is not applicable during the reporting period. There were two instances of a non-achievement of a management target, as set out in Cultural Heritage Management Plan (PCF6 or PCF8) (refer to Section 5.2 - Implementation Summary), identified during the preparation of this ACR and outside the reporting period.
5.c.(i)	submit to the Department for the Minister's approval a version of the Cultural Heritage Management Plan revised to address the findings of any report provided under conditions 9-5 and 9-6 of the Western Australian Approval; and	Not Applicable	This condition is not applicable during the reporting period. There were two instances of a non-achievement of a management target, as set out in Cultural Heritage Management Plan (PCF6 or PCF8) (refer to Section 5.2 - Implementation Summary) identified during the preparation of this ACR and outside the annual reporting period. Details of compliance with this condition will be provided within the next annual report, due October 2025.
5.c.(ii)	if the Minister has approved a revised Cultural Heritage Management Plan, implement the Cultural Heritage Management Plan.	Not Applicable	This condition is not applicable during the reporting period. There were two instances of non-achievement of a management target, as set out in Cultural Heritage Management Plan (PCF6 or PCF8) (refer to Section 5.2 - Implementation Summary), identified during the preparation of this ACR and outside the annual reporting period. Details of compliance with this condition will be included within the next annual report, due October 2025.
6.	To minimise impacts on the National Heritage listed – Dampier Archipelago (Burrup Peninsula) rock art due to air emissions, the approval holder must comply with condition 2 of the Western Australian Approval. In addition, the approval holder must:	Not Applicable	Applicability of condition 2 of the Western Australian Approval is provided in the Compliance Assessment Report (PUP_ACR2024-008). Submitted to DWER on the 24 April 2024 for the reporting period of 24 January 2023 to 23 January 2024.

Condition No.	Condition	Status	Evidence / Justification / Comments
6.a.	provide a complete copy of the Air Quality Management Plan to the Department within 10 business days of the approval of any revised version by the CEO;	Not Applicable	The Air Quality Management Plan is not required at this stage of the project and is to be submitted to the CEO for not more than 6 months prior to planned commencement of operations. A revised version of the Air Quality Management Plan was not submitted to the CEO during the reporting period.
6.b.	provide any reports required to be prepared under condition 2-6 of the Western Australian Approval to the Department for review within the timeframes specified in that condition; and	Not Applicable	The Air Quality Management Plan is not required at this stage of the project and is to be submitted to the CEO for approval not more than 6 months prior to planned commencement of operations.
6.c.	submit to the Department for the Minister's approval a reviewed and revised version of the Air Quality Management Plan within 6 months of any exceedance event in accordance with condition 2-8 (3) of the Western Australian Approval that has been reviewed by suitably qualified air emissions and rock art specialist.	Not Applicable	Not applicable during this reporting period.
7.	The approval holder must comply with condition 12 of the Western Australian Approval. In addition, the approval holder must:	Not Applicable	The first Environmental Performance Report required under condition 12 of the WA Approval is not due until 11 October 2028.
7.a.	submit each 5-yearly Environmental Performance Report required under the Western Australian Approval to the Department in the timeframes specified in condition 12-2 of the Western Australian Approval; and	Not Applicable	Condition 12-2 requires the first Environmental Performance Report to be submitted within three months of the expiry of the five-year period commencing from the first date of Ground Disturbing Activities. Ground Disturbance commenced on the 11 July 2023 (PUP_ACR2024-011). Five years from the first date GDA commenced is 11 July 2028. The first report is due 11 October 2028.

Condition No.	Condition	Status	Evidence / Justification / Comments
7.b.	if an Environmental Performance Report identifies any changes to the state of any matters listed in condition 12-3 of the Western Australian Approval, which affect one or more EPBC Act protected matter(s), treat the relevant findings of the Environmental Performance Report as at least one of the following:	Not Applicable	The first Environmental Performance Report is not due until 11 October 2028.
7.b.(i)	exceedance of a threshold criterion(s) specified in the Threatened Species Management Plan;	Not Applicable	The first Environmental Performance Report is not due until 11 October 2028.
7.b.(ii)	non-achievement of a management target(s) or management action(s) specified in the Culture Heritage Management Plan; and	Not Applicable	The first Environmental Performance Report is not due until 11 October 2028.
7.c.(iii)	exceedance of trigger criteria or threshold criteria specified in the Air Quality Management Plan.	Not Applicable	The first Environmental Performance Report is not due until 11 October 2028.
Offsets			
8.	To compensate for the residual significant impacts of clearing habitat for the Northern Quoll Pilbara Olive Python, Ghost Bat and Migratory Shorebirds, the approval holder must make financial contributions to the Pilbara Environmental Offsets Fund.	Compliant	<p>Consistent with EPBC Approval condition 9(d), The Approval holder 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) of the Western Australian Approval.</p> <p>This payment of \$10,605.65 was made on 13 September 2022 (PUP_ACR2024-012) (outside the reporting period for this annual report) as indicated by the notification letter to DCCEEW on 27September 2022 (PUP_ACR2024-016).</p>

Condition No.	Condition	Status	Evidence / Justification / Comments
			Ongoing biennial payments from date of first clearing (and accounting for all reporting stages), with the next (and only) biennial payment due for submission January 2026. The Approval holder remains compliant with this condition.
9.	In contributing to the Pilbara Environmental Offsets Fund, the approval holder must:	-	-
9.a.	Comply with condition 11 of the Western Australian Approval.	Compliant	Compliance with condition 11 of the Western Australian Approval is demonstrated within the Compliance Assessment Report (PUP_ACR2024-008) submitted to DWER on the 24 April 2024 for the reporting period of 24 January 2023 to 23 January 2024.
9.b.	Contribute funds towards an offset or offset activity that:	Not Applicable	The Pilbara Environmental Offsets Fund has been selected within the Western Australian and the EPBC Approvals. The PEOF will determine the offset activity. The initial payment of \$10,605.65 was made on 13 September 2022. Additional contributions will be made after the conclusion of the biennial reporting period specified in conditions 11-5(4) and 11-5(5). The conclusion of the biennial reporting period is 30 June 2025.
9.b.(i)	reduces the rate of decline of the Northern Quoll, Ghost Bat, Pilbara Olive Python and Migratory Shorebirds;	Not Applicable	The Pilbara Environmental Offsets Fund has been selected within the Western Australian and the EPBC Approvals. The PEOF will determine the offset activity that aims to achieve this condition. This condition is not applicable during the reporting period. The conclusion of the biennial reporting period is 30 June 2025.
9.b.(ii)	ensures a viable population of Northern Quoll, Ghost Bat, Pilbara Olive Python, and Migratory shorebirds remain in the Pilbara bioregion;	Not Applicable	The Pilbara Environmental Offsets Fund has been selected within the Western Australian and the EPBC Approvals. The PEOF will determine the offset activity that aims to achieve this condition. This condition is not applicable during the reporting period. The conclusion of the biennial reporting period is 30 June 2025.
9.b.(iii)	has specified outcomes and performance indicators; timeframes	Not Applicable	The Pilbara Environmental Offsets Fund has been selected within the Western Australian and the EPBC Approvals. The PEOF will

Condition No.	Condition	Status	Evidence / Justification / Comments
	and milestones for their achievement;		<p>determine the offset activity and specify the outcomes and performance indicators; timeframes and milestones for their achievement.</p> <p>This condition is not applicable during the reporting period. The conclusion of the biennial reporting period is 30 June 2025.</p>
9.b.(iv)	includes sufficient monitoring to detect achievement of performance indicators, milestones and the outcomes; and	Not Applicable	<p>The Pilbara Environmental Offsets Fund has been selected within the Western Australian and the EPBC Approvals. The PEOF will determine the offset activity and the associated monitoring.</p> <p>This condition is not applicable during the reporting period. The conclusion of the biennial reporting period is 30 June 2025.</p>
9.b.(v)	requires regular reporting to the approval holder of the outcomes of the monitoring.	Not Applicable	<p>The Pilbara Environmental Offsets Fund has been selected within the Western Australian and the EPBC Approvals. The PEOF will determine the offset activity and will report regularly to the Approval Holder as per agreement.</p> <p>This condition is not applicable during the reporting period. The conclusion of the biennial reporting period is 30 June 2025.</p>
9.c.	In complying with condition 11-5 of the Western Australian Approval, the approval holder must:	Not Applicable	<p>In complying with Condition 11-5 of W.A. Approval, the Impact Reconciliation Procedure (IRP) was sent to CEO (WA) on the 21 March 2022. Approval Letter from CEO was received on the 25 May 2022.</p>
9.c.(i)	submit the Impact Reconciliation Procedure to the Department prior to the commencement of the action for the approval of the Minister; and	Compliant	<p>The Approval holder submitted the IRP to the Department prior to the commencement of action.</p> <p>The IRP was sent to Minister on the 08 March 2022. The IRP was approved via letter from DCCEEW on the 07 April 2022. Refer to letter evidence PUP_ACR2024-010.</p> <p>The commencement of the action occurred on the 11 July 2023 PUP_ACR2024-011.</p> <p>The Approval Holder remains compliant during the reporting period.</p>

Condition No.	Condition	Status	Evidence / Justification / Comments
9.c.(ii)	not commence the action unless the Impact Reconciliation Procedure has been approved by the Minister in writing.	Compliant	<p>The Approval holder did not commence the action until after the IRP was approved by the Minister in writing.</p> <p>The IRP was approved via letter from DCCEEW on the 07 April 2022 as evidenced in PUP_ACR2024-010. The Minister was notified of the commencement of action on the 14 July 2023, which notes the action commenced on the 11 July 2023 in accordance with the document PUP_ACR2024-011.</p> <p>The Approval Holder remains compliant during the reporting period.</p>
9.d.	Provide a payment of 10 per cent of the total contribution to the Pilbara Environmental Offsets Fund, as stated in the approved Impact Reconciliation Procedure, within 30 business days of the date on which the Minister approves the Impact Reconciliation Procedure, which will contribute towards achieving the requirements of condition 9(b).	Compliant	<p>The Approval holder 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) of the Western Australian Approval.</p> <p>This payment of \$10,605.65 was made on 13 September 2022 (PUP_ACR2024-012) as notified to DCCEEW on the 27 September 2022 (PUP_ACR2024-016). The IRP was approved by the Minister on the 7 April 2022. Therefore the first Payment of 10% was due on the 23 May 2022 according to this condition.</p> <p>However, the Approval Holder was provided the Tax invoice from DWER on the 30 August 2022 for the “<i>Upfront Commonwealth Payment – 10% of the overall clearing allowance</i>” (refer to evidence PUP_ACR2024-021). This payment was invoiced to the Approval Holder after the due date according to the condition requirement and the due date issued on the invoice was on 30 September 2022. It was not possible for the Approval Holder to make the payment within the 30 business days of the date on which the Minister approves the Impact Reconciliation Procedure; however the Approval Holder did provide the payment within 30 days of receiving the invoice from DWER and by the due date issued on the notice.</p>
9.e.	Make biennial payments in accordance with the timing specified in condition 11-5 of the Western Australian Approval,	Not Applicable	<p>The first biennial reporting period is from the 11 July 2023 to 30 June 2025 in accordance with the requirements of condition 11-5 (4) and 11-5 (5) of MS 1180.</p>

Condition No.	Condition	Status	Evidence / Justification / Comments
	based on evidence of the actual clearing footprint, to the Pilbara Environmental Offsets Fund that is equivalent to or greater than the value of the following amounts on the date of this approval, by adjustment in accordance with the CPI from the date of this approval decision until the date on which any payment is made of:		Therefore, biennial payments have not commenced in accordance with the timing specified in condition 11-5 of MS 1180.
9.e.(i)	A minimum of \$3,306 AUD (excluding GST) per hectare of cleared Rocky Outcrops habitat;	Not Applicable	Payment is not due until after the 30 of June 2025. The biennial payments will not commence until end of the first biennial reporting period, between 11 July 2023 to 30 June 2025 in accordance with the requirements of condition 11-5 (4) and 11-5 (5) of MS 1180.
9.e.(ii)	A minimum of \$1,653 AUD (excluding GST) per hectare of cleared good to excellent quality Hummock Grasslands;	Not Applicable	Payment is not due until after the 30 of June 2025. The biennial payments will not commence until end of the first biennial reporting period, between 11 July 2023 to 30 June 2025 in accordance with the requirements of condition 11-5 (4) and 11-5 (5) of MS 1180.
9.e.(iii)	A minimum of \$1,653 AUD (excluding GST) per hectare of cleared Drainage Line habitat; and	Not Applicable	Payment is not due until after the 30 of June 2025. The biennial payments will not commence until end of the first biennial reporting period, between 11 July 2023 to 30 June 2025 in accordance with the requirements of condition 11-5 (4) and 11-5 (5) of MS 1180.
9.e.(iv)	A minimum of \$1,653 AUD (excluding GST) per hectare of cleared good to excellent quality Samphire Shrubland/Supratidal flats.	Not Applicable	Payment is not due until after the 30th of June 2025. The biennial payments will not commence until end of the first biennial reporting period, between 11 July 2023 to 30 June 2025 in accordance with the requirements of condition 11-5 (4) and 11-5 (5) of MS 1180.
9.f.	Submit evidence of each payment made to the Department within 10 business days of the date of making	Compliant	The initial 10 per cent of the total contribution to the Pilbara Environmental Offsets Fund payment was made on the 13 September 2022 (PUP_ACR2024-012) and evidence submitted

Condition No.	Condition	Status	Evidence / Justification / Comments
	the payment.		<p>to DCCEEW via email on 27 September 2022 (PUP_ACR2024-016). Therefore, notification of Payment was 10 days following the payment being made.</p> <p>All other payments are not due until after the 30 of June 2025. The biennial payments will not commence until end of the first biennial reporting period between 11 July 2023 to 30 June 2025 in accordance with the requirements of condition 11-5 (4) and 11-5 (5) of MS 1180.</p>
9.g.	Include details of progress towards, or achievement of, the outcomes specified under condition 9(b) for the Pilbara Olive Python, Northern Quoll, Ghost Bat and Migratory Shorebirds in each annual compliance report submitted to the Department.	Compliant.	Details provided in Table 8.
9.h.	Write to the Minister, within 10 business days of being aware or having concerns, that the offset outcomes specified for the Pilbara Environmental Offsets Fund project(s) may not be achieved for each or all of the species to be offset: Pilbara Olive Python, Northern Quoll, Ghost Bat and Migratory Shorebirds.	Not Applicable	This condition has not been triggered during the reporting period.
9.i.	On completion of clearing, submit to the Department a final Impact Reconciliation Report. The Minister may agree to adjust the final year's payment to the Pilbara Environmental Offsets Fund and notify the approval holder in writing of the adjusted final payment amount based on evidence of the	Not Applicable	This condition has not been triggered during the reporting period.

Condition No.	Condition	Status	Evidence / Justification / Comments
	actual clearing footprint.		
10.	Should the Minister determine that the Pilbara Environmental Offsets Fund is likely to fail for one or more protected matter(s), the Minister may write to the approval holder asking to provide evidence that failure has not occurred or is unlikely to occur and nominating a deadline by which this must be provided.	Not Applicable	This condition has not been triggered during the reporting period.
10.a.	If, after considering any information provided by the approval holder as required under condition 9(h) of this approval, by the deadline nominated by the Minister, the Minister determines that the Pilbara Environmental Offsets Fund has failed for one or all species named in condition 9 of this approval, the approval holder must submit for the Minister's approval, within 4 months of being notified by the Minister, an Offset Strategy consistent with the principles of the Environmental Offsets Policy to the satisfaction of the Minister.	Not Applicable	This condition has not been triggered during the reporting period.
10.b.	If the Offset Strategy has not been approved by the Minister in writing within 6 months of the notification by the Minister under condition 10(a) of this approval, and the Minister notifies the approval holder that the Offset Strategy is not suitable for approval, the Minister may, at least 2 months after so	Not Applicable	This condition has not been triggered during the reporting period.

Condition No.	Condition	Status	Evidence / Justification / Comments
	notifying the approval holder, approve a version of the Offset Strategy revised by the Department. The approval holder must commence implementation of the approved Offset Strategy within 2 months of the approval of the Offset Strategy by the Minister in writing, or another time as agreed in writing by the Minister. The approval holder must implement the approved Offset Strategy for the life of the project.		
10.c.	The Offset Strategy to be provided for the Minister's approval, if required by condition 10(a) of this approval, must provide a framework for how the residual significant impacts from the approved action on the Pilbara Olive Python, Northern Quoll, Ghost Bat and Migratory Shorebirds will be offset and must detail:	Not Applicable	This condition has not been triggered during the reporting period.
10.c.(i)	how the strategy will achieve the outcomes required under condition 9(b) of this approval;	Not Applicable	This condition has not been triggered during the reporting period.
10.c.(ii)	how it accounts for relevant approved conservation advices, recovery plans and threat abatement plans;	Not Applicable	This condition has not been triggered during the reporting period.
10.c.(iii)	the party to be responsible for implementing the proposed offset(s);	Not Applicable	This condition has not been triggered during the reporting period.

Condition No.	Condition	Status	Evidence / Justification / Comments
10.c.(iv)	the location and nature of the proposed offset(s);	Not Applicable	This condition has not been triggered during the reporting period.
10.c.(v)	detailed objectives, outcomes, and timeframes for their achievement;	Not Applicable	This condition has not been triggered during the reporting period.
10.c.(vi)	budget;	Not Applicable	This condition has not been triggered during the reporting period.
10.c.(vii)	performance and completion criteria for evaluating conservation or research outcomes;	Not Applicable	This condition has not been triggered during the reporting period.
10.c.(viii)	project monitoring (with indicators and measures) capable of detecting progress towards and achievement of the required outcomes;	Not Applicable	This condition has not been triggered during the reporting period.
10.c.(ix)	reporting of specified outputs/offset activities, progress towards and achievement of the required outcomes, and evaluation of appropriateness of measures implemented;	Not Applicable	This condition has not been triggered during the reporting period.
10.c.(x)	a description of the potential risks to the successful implementation of each proposed offset (including but not limited to environmental, administrative, financial, and governance risks);	Not Applicable	This condition has not been triggered during the reporting period.
10.c.(xi)	a description of the measures that will be implemented to mitigate risk	Not Applicable	This condition has not been triggered during the reporting period.

Condition No.	Condition	Status	Evidence / Justification / Comments
	associated with each proposed offset and a description of the contingency actions that will be implemented if performance or completion criteria are not met;		
10.c.(xii)	processes to adaptively manage the proposed offset;	Not Applicable	This condition has not been triggered during the reporting period.
10.c.(xiii)	how the proposed offset is consistent with the Environmental Offsets Policy; and	Not Applicable	This condition has not been triggered during the reporting period.
10.c.(xiv)	how the approval holder will ensure that the measures to be implemented as part of the Offsets Strategy have no detrimental impact on any threatened species listed under the EPBC Act.	Not Applicable	This condition has not been triggered during the reporting period.
Part B – Standard administrative conditions			
Notification of date of commencement of Action			
11.	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Compliant	The Minister was notified of the commencement of action on the 14 July 2023 via letter by the Approval Holder. The action commenced on the 11 July 2023 as detailed in the letter PUP_ACR2024-011. Therefore, the Minister was notified in writing three (3) days following the commencement of action.
12.	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the	Not Applicable	The Action commenced on the 11 July 2023 (PUP_ACR2024-011) and the date of the approval is 26 February 2022. Therefore, the action commenced within 5 years from the approval date.

Condition No.	Condition	Status	Evidence / Justification / Comments
	Minister.		
Compliance Records			
Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media.			
13.	The approval holder must maintain accurate and complete compliance records.	Compliant	<p>The approval holder maintains accurate records within a compliance obligation database and within a structured folder system stored on a cloud-based server.</p> <p>Changes to documents and processes are tracked through document control procedures which includes the recording of the relevant dates, personnel involved in the changes and description of changes made. Any written records are scanned and uploaded to the system. All digital documents include track changes.</p>
14.	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.	Not Applicable	This condition has not been triggered during the reporting period.
Submission and publication of plans			
15.	The approval holder must:	-	-
15.a.	submit all plans electronically to the Department;	Compliant	<p>The plans required by the approval were submitted to the Department electronically as follows:</p> <p>Cultural Heritage Management Plan (PCF6) submitted electronically on 02 February 2023 as evidence by the email [PUP_ACR2024-007].</p> <p>Cultural Heritage Management Plan (PCF8) submitted electronically on 09 February 2024 as evidence by the Letter [PUP_ACR2024-0015].</p> <p>Threatened Species Management Plan (PCF5) submitted</p>

Condition No.	Condition	Status	Evidence / Justification / Comments
			<p>electronically on 18 February 2022 as evidence by the Email [PUP_ACR2024-019].</p> <p>Threatened Species Management Plan (PCF6) submitted electronically on 22 March 2024 as evidence by (Submission Letter PUP_ACR2024-017).</p> <p>Impact Reconciliation Procedure (PCF1) submitted electronically on 08 March 2022 as evidence by the Letter [PUP_ACR2024-0010].</p> <p>The Air Quality Management is not required to be submitted until the revised AQMP is submitted to the CEO under the Western Australian approval, in accordance with Condition 6 (a) of this approval.</p>
15.b.	unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of the date;	-	<p>NB: the Plans required under the approval are:</p> <ul style="list-style-type: none"> • Threatened Species Management Plan • Cultural Heritage Management Plan • Air Quality Management Plan • Impact Reconciliation Procedure.
15.b.(i)	of this approval, if the version of the plan to be implemented is specified in these conditions; or	Non-Compliant	<p>The date of the approval is 26 February 2022. The Plans were published on the Project Website as follows:</p> <ul style="list-style-type: none"> • The Threatened Species Management Plan version specified in the conditions is PCF-PD-EN-TSMP_PCF5, 23 February 2022 (PCF5). The Version published on the website is Rev A (19 March 2020). • Air Quality Management Plan specified in the conditions is Perdaman Urea Project Environmental Management Plan Air Quality (Final Version PCF 2, 25 March 2021) or a subsequently revised and approved version. The version on the website is Air Quality and Greenhouse Gas Emissions Rev 1 12 March 2020.

Condition No.	Condition	Status	Evidence / Justification / Comments
15.b.(ii)	that the plan is submitted to the Minister or the Department if the plan does not require the approval of the Minister but was not finalised before the date of this approval; or	Not Applicable	-
15.b.(iii)	that the plan was approved by the Minister in writing, if the plan requires the approval of the Minister; or	Non-Compliant	The Impact Reconciliation Procedure is required to be approved by the Minister in accordance with Condition 9 (c)(i) and (ii) prior to GDA. IRP Rev 1 was approved on the 7 April 2022. However, IRP Rev 1 is not published on the website. Therefore, it was not published within 20 business days of approval from the Minister (i.e. Plan was not published by the 9 May 2022).
15.b.(iv)	that the plan was confirmed by the CEO, if the plan requires the confirmation of the CEO.	Compliant.	In accordance with the EPBC Approval - Cultural Heritage Management Plan means the Aboriginal Heritage Management Plan, <i>Status: Confidential, Perdaman Urea Project Burrup Peninsula, Western Australia (Version PCF 2, 26 March 2021)</i> or a subsequently revised version approved in accordance with the requirements of these conditions and/or the Western Australian Approval. The revised Cultural Heritage Management Plan (PCF8) was published on 27 March 2024 (PUP_ACR2024-020), the Plan (PCF8) was sent to the CEO on the 22 March 2024. PCF 8 is a revision of the Confirmed Plan (PCF6). In accordance with condition 9-8(1) of the MS1180, approval is not required just submission of the revised Plan. The DCCEEW was notified the same day as EPA.
15.c.	exclude or redact sensitive ecological data from plans that are to be published on the website or provided to a member of the public; and	Not Applicable	The Management Plans published did not include sensitive ecological data that required to be redacted.
15.d.	keep plans published on the website until the end date of this approval.	Non-Compliant	The following plans are published on the approval holder's website: <ul style="list-style-type: none"> Cultural Heritage Management Plan (PCF 8) (most up to

Condition No.	Condition	Status	Evidence / Justification / Comments
			<p>date version).</p> <ul style="list-style-type: none"> Threatened Species Management Plan (Rev A), version noted in the EPBC 2018/8383 Approval is the (PCF-PD-EN-TSMP, version PCF 5, 23 February 2022). This version is not published on the website. Impact Reconciliation Procedure (Rev 1 or Rev 2) are not published. The latest IRP version (Rev 2) is not published on the website. IRP Rev 2 was submitted on the 17 November 2023 (PUP_ACR2024-018). The Project implemented IRP Rev 1 during the reporting period. Air Quality Management Plan (Final Version PCF 2, 25 March 2021), is not published on the website.
16.	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under conditions of this approval, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the in accordance with the requirements of the Threatened Species Management plan.	Not Applicable	There has been no monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under conditions of this approval during the reporting period.
<p>Annual compliance reporting</p> <p>Note: Annual compliance reports may be published on the Department's website.</p>			
17.	The approval holder must prepare an annual compliance report for each 12-month period following the date of commencement of the action, or otherwise as agreed in	Compliant	<p>The action commenced on the 11 July 2023. Therefore the 12-month period following this is between 11 July 2023 to 10 July 2024.</p> <p>This ACR satisfies the requirements of this condition. This is the</p>

Condition No.	Condition	Status	Evidence / Justification / Comments
	writing by the Minister. The approval holder must:		first ACR prepared in accordance with this condition.
17.a.	publish each compliance report on the website within 60 business days following the relevant 12-month period;	Not Applicable	This ACR is the first and the publishing timeframe is outside the reporting period.
17.b.	notify the Department by email that a compliance report has been published on the website and provide the weblink for the annual compliance report within 5 business days of the date of publication. This notification must include documentary evidence of the date of publication of the compliance report;	Not Applicable.	Notification to the Department is outside this reporting period.
17.c.	keep all annual compliance reports publicly available on the website until this approval expires;	Not Applicable	This is the first ACR and the date it is made publicly available is outside the reporting period.
17.d.	exclude or redact sensitive ecological data from annual compliance reports published on the website; and	Not applicable.	There was no sensitive ecological data to redact.
17.e.	where any sensitive ecological data has been excluded from the version published, submit the full annual compliance report to the Department within 5 business days of publication.	Not applicable.	There was no sensitive ecological data to redact.
Reporting non-compliance			

Condition No.	Condition	Status	Evidence / Justification / Comments
18.	The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than 2 business days after becoming aware of the incident or non-compliance. The notification must specify:	Not Applicable	<p>Several non-compliances were identified with both management plan commitments and conditions of the EPBC approval during the preparation of this report (outside the reporting period).</p> <p>The Approval Holder notified the Department via email and letter notification on the 03 October 2024. These non-compliances were identified on the 03 October 2024. Therefore, notification was provided within 2 business days. However this condition is not applicable during reporting period, as the non-compliances were identified outside the reporting period for this ACR.</p>
18.a.	any condition which is or may be in breach;	Not Applicable	Not applicable during the reporting period, non-compliances were identified outside the reporting period.
18.b.	a short description of the incident and/or non-compliance; and	Not Applicable	Not applicable during the reporting period, non-compliances were identified outside the reporting period.
18.c.	the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.	Not Applicable	Not applicable during the reporting period, non-compliances were identified outside the reporting period.
19.	The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 7 business days after becoming aware of the incident or non-compliance, specifying:	Not Applicable	Not applicable during the reporting period, non-compliances were identified outside the reporting period.
19.a.	any corrective action or investigation which the approval holder has already taken or intends	Not Applicable	Not applicable during the reporting period, non-compliances were identified outside the reporting period.

Condition No.	Condition	Status	Evidence / Justification / Comments
	to take in the immediate future;		
19.b.	the potential impacts of the incident or non-compliance; and	Not Applicable	Not applicable during the reporting period, non-compliances were identified outside the reporting period.
19.c.	the method and timing of any remedial action that will be undertaken by the approval holder.	Not Applicable	Not applicable during the reporting period, non-compliances were identified outside the reporting period.
Independent audit			
20.	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.	Not Applicable	The Minister has not requested that an independent audit be carried out during the reporting period.
21.	For each independent audit, the approval holder must:	Not Applicable	The Minister has not requested that an independent audit be carried out during the reporting period.
21.a.	provide the name and qualifications of the independent auditor and the draft audit criteria to the Department;	Not Applicable	The Minister has not requested that an independent audit be carried out during the reporting period.
21.b.	only commence the independent audit once the audit criteria have been approved in writing by the Department; and	Not Applicable	The Minister has not requested that an independent audit be carried out during the reporting period.
21.c.	submit an audit report to the Department within the timeframe specified in the approved audit criteria.	Not Applicable	The Minister has not requested that an independent audit be carried out during the reporting period.
22.	The approval holder must publish the audit report on the website	Not Applicable	The Minister has not requested that an independent audit be carried out during the reporting period.

Condition No.	Condition	Status	Evidence / Justification / Comments
	within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.		
Revision of action management plans			
23.	The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.	Compliant	<p>On the 7 February 2024, the approval holder submitted an application for approval of revised Threatened Species Management Plan under section 143A of the <i>EPBC Act</i> (refer to letter PUP_ACR2024-017).</p> <p>The <i>EPBC Act 1999</i> allows revised plans to be implemented without approval by the Minister, provided that the proposed changes are unlikely to have a new or increased impact on matters protected under the approval.</p> <p>It is noteworthy that the changes proposed in the Revised Management Plan are unlikely to present a new or increased impact, and therefore the Revised Management Plan does not require <i>approval through Section 143A of the EPBC Act according to the Guidance on 'new or increased impact' relating to changes to approved management plans under EPBC Act environmental approvals</i> (Commonwealth of Australia, 2017). However, DCCEEW post-assessment officers advised Perdaman that referral for approval should be carried out as it is a condition of the EPBC Approval 2018/8383 to seek approval for a change to management action from the Minister or delegate. Perdaman therefore awaits DCCEEW to confirm their satisfaction with the independent ecologist assessment, stating that the Revised Management Plan addresses any and all risks to threatened species and that the changes present no new or increased risk. (Refer to Letter evidence (PUP_ACR2024-017)).</p> <p>As the Project is waiting for Minister Approval of the Revised Draft Threatened Species Management Plan, PCF-PD-EN-TSMP, PCF 6, 18 December 2023, Perdaman continues to implement the <i>Confirmed Threatened Species Management Plan, PCF-PD-</i></p>

Condition No.	Condition	Status	Evidence / Justification / Comments
			<i>EN-TSMP, PCF 5, 18 February 2022 during the reporting period.</i>
Completion of the action			
24.	Within 20 business days after whichever is the earlier of:	Not Applicable.	The approval remains in effect.
24.a.	the completion of the action, or	Not Applicable.	The approval remains in effect.
24.b.	60 business days before the end date of the period for which this approval has effect, the approval holder must notify the Department in writing and provide completion data.	Not Applicable.	The approval remains in effect.

4.3 Correcting Non-Compliances

Table 3 Corrective Measures for Non-Compliances

Condition Number	Who detected	Department notification (how/when)	Corrective Action/Measures to avoid a reoccurrence	Corrective Responsible Person	Action	Corrective Timeframe	Action
15.b.(i)	SCJV	Letter/Email	<p>The latest plans need to be uploaded to the Perdaman site.</p> <p>The Threatened Species Management Plan (TSMP) version specified in the conditions is PCF-PD-EN-TSMP_PCF5, 23 February 2022 (PCF5) – This should be published by the 25 March 2022.</p> <p>Air Quality Management Plan (AQMP) in the approval means Perdaman Urea Project Environmental Management Plan Air Quality (Final Version PCF 2, 25 March 2021) or a subsequently revised version approved in accordance with the requirements of these conditions. This should have been published by the 25 March 2022.</p> <p>Perdaman will, within 7 days of the date of this ACR submission, publish both the TSMP and AQMP on Perdaman’s website.</p> <p>Perdaman will ensure that future plans that are to be</p>	Damon Carter		Within 7 days	

			published on Perdaman's website will be uploaded by the required timeframes.		
15.b.(iii)	SCJV	Letter/Email	Perdaman will publish the IRP on Perdaman's Website (Rev 1) within 7 days of the date of this ACR submission.	Damon Carter	Within 7 days
15.d.	SCJV	Letter/Email	Perdaman will ensure to keep the most up-to-date Management Plans published on Perdaman's website and will publish the latest versions of the TSMP (PCF5), IRP (rev 1) and the AQMP (PCF2) within 7 days of the date of this ACR submission.	Damon Carter	Within 7 days

5 Implementation Summaries – Environmental Management Plans

5.1 Implementation Summary – Threatened Species Management Plan (PCF-PD-EN-TSMP_PCF5, 23 February 2022)

Table 4 Implementation Summary Threatened Species Management Plan

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
<p>Attachment C 2018-8383 Environmental Management Strategy</p>	<p>Objective Minimisation of actual or potential impacts to conservation-significant fauna resulting from the reduction and / or fragmentation of habitat during construction phase of the Project.</p> <p>Target No impacts to native fauna from the construction phase of the Project.</p>	<p>Management Action 1: Project will clear a maximum of 73.05 ha of native vegetation, including a maximum of 64 ha of listed threatened and migratory habitats (as approved through MS 1180):</p> <ul style="list-style-type: none"> • 0.16 ha of Rocky Outcrops habitat • 49.17 ha of Hummock Grasslands habitat • 2.7 ha of Drainage Line habitat • 11.97 ha of Samphire Shrubland/Supratidal Flats habitat. 	<p>Monitoring:</p> <ul style="list-style-type: none"> • Ground Disturbance Permits (GDP's) to be issued for all clearing and disturbance activities. • Actual clearing carried out monitored by relevant personnel. • Ongoing monitoring of clearing authorised by GDP's but not yet conducted and clearing carried out. <p>Reporting:</p> <ul style="list-style-type: none"> • Monthly clearing report compiled which compares the progress against the clearing limits both visually (using GIS data) and numerically. • Incidents reported through Monthly Project Environmental Reporting. • Reporting to DCCEEW, CEO and DBCA within seven days of the exceedance being identified as per TSMP where there is 	<p>Compliant</p>	<p>During the reporting period a total of 71.936 ha has been cleared of native vegetation. 1.114 ha is remaining of the allocated 73.05 ha.</p> <ul style="list-style-type: none"> • 0.152 ha of Rocky Outcrops habitat has been cleared (0.008 ha remaining of the allocated 0.16 ha) • 47.953 ha of Hummock Grasslands habitat (1.217 ha is remaining of the allocated 49.17 ha) • 2.546 ha of Drainage Line habitat (0.154 ha is remaining of the allocated 2.7 ha) • 11.517 ha of Samphire Shrubland/Supratidal Flats habitat (0.453 ha is remaining of the allocated 11.97 ha) <p>There have not been any recorded incidents or impacts to threatened fauna and listed migratory birds within the Fauna interaction Register or the Project's INX incident reporting system during the reporting period.</p> <p>The project has implemented a</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			a threshold exceedance.		GDP process and permit system for all ground disturbing activities. Procedure – (0000-ZA-E-02860) and Permit (0000-ZA-E-02870). Clearing is monitored through a GIS portal, onsite surveys and updated with live data, regular audit of the actual clearing versus allowable clearing is carried out in monthly reporting as are incidents. Details are recorded on the Projects GDP register (45826-HSE-REG-G-1001_GDP).
Attachment C 2018-8383 Environmental Management Strategy		<p>Trigger Criterion:</p> <ul style="list-style-type: none"> Actual and planned clearing within the development envelope exceeds 90% (65.75 ha) of the approved clearing limit. <p>Threshold Criterion:</p> <ul style="list-style-type: none"> Actual clearing within the development envelope exceeds the approved clearing limit (73.05ha) The extent of clearing within the Rocky Outcrops habitat exceeds 0.16 ha. 		Compliant	<p>While the allocated clearing limits were 73.05 ha, Perdaman only cleared 71.936 ha, with 1.114 ha remaining.</p> <p>This quantity exceeded the 90% trigger criterion (65.75 ha). However, the clearing allowance of 73.05 ha has not been exceeded or reached within the reporting period.</p> <p>0.152 ha of Rocky Outcrops habitat has been cleared (0.008 ha remaining of the allocated 0.16 ha)</p> <p>Threshold criteria was not exceeded during the reporting period.</p>
Attachment C 2018-8383 Environmental Management Strategy		<p>Management Action 2:</p> <p>Avoid construction activities during Pilbara Olive Python inactive and breeding periods to limit impacts on this species.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Clearing schedule to align with Pilbara Olive Python protection measures. Visual Inspection of Pilbara Olive Python habitat (Rocky 	Compliant	There has been no recorded incidents or impacts to threatened fauna, including the Pilbara Olive Python and listed migratory birds in the Fauna interaction register and/or the INX incident reporting system during the reporting period.

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>outcrops).</p> <p>Reporting:</p> <ul style="list-style-type: none"> Any Pilbara Olive Python fauna deaths and injuries will be reported to the Department of Biodiversity, Conservation and Attractions (DBCA) within one week of being recorded. Injuries and deaths of Pilbara Olive Python reported as an incident and reported in writing to the DCCEEW as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval. 		<p>Clearing commenced on 11 July 2023 for the Hearson Cove Road realignment which is inside the Pilbara Olive Python inactive and breeding periods (June – August). However, clearing within the known Pilbara Olive Python habitat did not commence until September 2023, which is outside the inactive and breeding periods.</p> <p>GDP's include condition for pre-clearance inspection for Pilbara Olive Python by an ecologist. The Project implemented a trapping and relocation Program to support the identification and removal of pythons prior to clearing, by consultant GHD. The ecologists remained on site for ongoing monitoring during clearing activities. The Project has been issued a s. 40 authorisation under the BC Act to take and disturb the Pilbara Olive Python and a license under regulation 28 of the BC Act to relocate species.</p>
<p>Attachment C</p> <p>2018-8383 Environmental Management Strategy</p>		<p>Trigger Criterion</p> <ul style="list-style-type: none"> Clearing activities occurring close to or during breeding season or inactive period resulting in sightings. Increase in sightings of Pilbara Olive Python during pre-clearance surveys or sightings by fauna spotters during 	<ul style="list-style-type: none"> Reporting to DCCEEW, CEO and DBCA within seven days of the exceedance being identified and as per TSMP where there is a threshold exceedance. 	Compliant	<p>Clearing did occur during the breeding season or inactive period at the Hearson Cove Road Realignment, however this was not within the known Pilbara Olive Python habitat and did not result in sightings and/ or increase in sightings.</p> <p>Contingency Actions were implemented, including fauna spotters, awareness training and</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>clearing activities.</p> <p>Threshold Criterion</p> <ul style="list-style-type: none"> Injury or death of Pilbara Olive Python. 			<p>qualified fauna handler during clearing.</p> <p>As evidenced by the Fauna interaction register the Project has had no sightings during the pre-clearance surveys or sightings by fauna spotters during clearing activities, and no Pilbara Olive Pythons have been removed, taken or relocated.</p> <p>One (1) Pilbara Olive Python was seen crossing the Hearson Cove Road during the reporting period, however, it was sighted during a period of no construction or clearing activities, and it moved away to habitat off-site, unhindered and without assistance.</p>
<p>Attachment C</p> <p>2018-8383 Environmental Management Strategy</p>		<p>Management Action 3:</p> <ul style="list-style-type: none"> Prior to clearing, engage a qualified fauna specialist to conduct a trapping and relocation program in accordance with DBCA's Standard Operating Procedures (SOPs) and permit/licence conditions as required under the BC Act. 	<p>Monitoring:</p> <p>Pre-clearance survey conducted by qualified ecologist in accordance with Department of Biodiversity, Conservation and Attraction's SOP's.</p> <p>Reporting:</p> <ul style="list-style-type: none"> The Pre-clearance Report will include as a minimum: <ul style="list-style-type: none"> the location and extent of threatened flora individuals and/or habitat. the location and 	Compliant	<p>GHD was engaged by the Project to conduct a pre-clearing trapping and relocation program. The Program was conducted in accordance with DBCA's Standard Operating Procedures (SOPs) and permit/licence conditions as required under the BC Act. The Trapping and relocation program commenced between September 2023 for Site C and October 2023 for Site F.</p> <p>Clearing commenced on the 11 July 2023 for the Hearson's Cove road, with a trapping and translocation program commencing on the 3 July 2023 by Trace Ecology. Trace completed the program as per the</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<ul style="list-style-type: none"> ○ extent of threatened fauna habitats and individuals sighted. ○ the location, extent and abundance of invasive weeds. ○ the total area of disturbance required for the Project works. ○ the location and type of habitat features within the Project Footprint. ○ the location of designated stockpile areas for soil and vegetation management. 		<p>section 40 authorisation (BC Act).</p> <p>Fauna trapping commenced on 19 September 2023 at Site C and clearing commenced on 28 September, 2023. Site F Fauna Trapping commenced on 2 October 2023, with clearing commencing October 9, 2023.</p>
<p>Attachment C</p> <p>2018-8383 Environmental Management Strategy</p>		<p>Trigger Criterion:</p> <ul style="list-style-type: none"> • Procedures for clearing, trapping and relocation programs are not in alignment with DBCA SOP's. • DBCA SOPs not reviewed prior to program implementation. • Pre-clearance report not complete or missing information. <p>Threshold Criterion:</p> <ul style="list-style-type: none"> • Clearance surveys, trapping and relocation program procedures not implemented in accordance with DBCA SOP's. • Fauna handled by unlicensed person/persons. 	<ul style="list-style-type: none"> • Reporting to DCCEEW, CEO and DBCA within seven days of the exceedance being identified and as per TSMP where there is a threshold exceedance. 	Not Applicable	There were no incidents or exceedances associated with trigger criteria or threshold criteria.
<p>Attachment C</p> <p>2018-8383</p>		<p>Management Action 4:</p> <ul style="list-style-type: none"> • Suitability qualified fauna 	<p>Monitoring:</p> <ul style="list-style-type: none"> • Visual observation of 	Compliant	During the reporting period fauna spotting on the project has been conducted by suitably qualified and

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
Environmental Management Strategy		spotters will be present during all vegetation clearing activities.	<p>clearing activities by suitably qualified fauna spotters of fauna during clearing activities.</p> <ul style="list-style-type: none"> Spotters will have the authority to stop clearing activities until the identified fauna is safely removed from the area. Fauna identified within the demarcated clearing areas, will be relocated using a suitably qualified expert using DBCA's Standard Operating Procedures (SOPs) and permit/licence conditions as required under the BC Act. 		<p>experienced personnel (listed on the Regulation 28 BC Act Licence).</p> <p>This requirement is included within the relevant GDP and personnel are informed of the requirement during inductions and other training.</p> <p>Fauna interactions are recorded on the Fauna interaction register. There are no injuries or deaths to threatened species to report during the reporting period.</p>
<p>Attachment C</p> <p>2018-8383 Environmental Management Strategy</p>		<p>Trigger Criterion:</p> <ul style="list-style-type: none"> Fauna spotters not suitably qualified. Procedures for the relocation programs are not in accordance with DBCA SOP's prior implementation. DBCA SOPs not reviewed prior to program implementation. <p>Threshold Criterion:</p> <ul style="list-style-type: none"> Fauna handling and relocation program not implemented in accordance with DBCA SOP's. Fauna handled by unlicensed person/persons. 	<p>Reporting:</p> <ul style="list-style-type: none"> Recording of all interactions with fauna in the Fauna Interaction Register (for fauna removed or handled during spotting event). All fauna interactions recorded in the Fauna Interaction Register are reported in the Monthly Project Environmental Reporting. Reporting in accordance with DBCA's Standard Operating Procedures (SOPs) and permit/licence conditions as required under the BC Act. 	Compliant	<p>Trigger and Threshold criteria have not been exceeded during the reporting period. The Project ensured suitably qualified and experienced personnel were present during all clearing activities.</p> <p>The Project has a section 40 Authorisation (TFA2223-0317) and Reg 28 license (FR28000358) (FR28000417-b), which were active during the reporting period under the BC Act 2016, which lists the Projects' fauna handlers. In addition, the conditions and procedures required to be implemented when relocating and handling fauna on the Project are as described.</p> <p>NB: FR28000417-b licence is valid between 9 May 2024 through 8 May 2027. FR28000358 licence was valid between 29 June 2023 through 28 June 2024.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<ul style="list-style-type: none"> Reporting to DCCEEW, CEO and DBCA within seven days of the exceedance being identified and as per TSMP where there is a threshold exceedance. Prepare an additional report to the CEO and the DAWE within twenty-one (21) days of the exceedance being reported as required by Condition 5-6 (5) of MS1180. Within 6 months of any exceedance of a threshold criterion, submit to the DAWE for the Minister's approval a Remediation Plan in accordance with Condition 3(b) of the EPBC Act Approval. Submit an Offset Strategy within 10 months of the exceedance of threshold criterion in accordance with Condition 3(c) of the EPBC Act Approval, as required 		
Attachment C 2018-8383 Environmental Management Strategy		Management Action 5: <ul style="list-style-type: none"> Vegetation clearing to be undertaken progressively and incrementally during construction to allow fauna within the development envelope to leave the area and to minimise the pressure on the carrying 	Monitoring: <ul style="list-style-type: none"> Pre-clearing meeting carried out for relevant personnel to review the GDP including clearing extents, clearing timing and any additional requirements prior to the commencement of clearing 	Compliant	The project carried out clearing progressively and in accordance with the requirements of the s.40 Authorisation (TFA2223-0317) methodology. Visual observations were conducted by suitably qualified fauna spotters during clearing

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		capacity of native vegetation surrounding the site.	<ul style="list-style-type: none"> activities. Visual observation of clearing activities by suitably qualified fauna spotters of fauna during clearing activities. 		<p>activities.</p> <p>Fauna interactions are recorded on the Fauna interaction register. There are no injuries or deaths to threatened species to report during the reporting period.</p>
		<p>Trigger Criterion:</p> <ul style="list-style-type: none"> Clearing progress nearing incremental limits authorised by the GDP. Pre-clearing meeting not carried out with GDP requirements not reviewed prior to clearing activities. Fauna spotters not suitably qualified. <p>Threshold Criterion:</p> <ul style="list-style-type: none"> Clearing progress exceeds incremental limits authorised by the GDP. GDP requirements not addressed. Fauna handled by unlicensed person/persons. 	<p>Reporting:</p> <ul style="list-style-type: none"> All fauna interactions to be recorded in the Fauna Interaction Register, including the name of the spotter. Reporting in accordance with DBCA's Standard Operating Procedures (SOPs) and permit/licence conditions as required under the BC Act. Where threshold criteria is exceeded: <ul style="list-style-type: none"> Report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified in accordance with Condition 5-6 (1) of MS1180. Prepare an additional report to the CEO and the DAWE within twenty-one (21) days of the exceedance being reported as 	Compliant	<p>Trigger and Threshold criteria have not been exceeded during the reporting period. The Project ensured suitably qualified and experienced personnel were present during all clearing activities. GDP requirements are discussed in a pre-clearing meeting.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>required by Condition 5-6 (5) of MS1180.</p> <ul style="list-style-type: none"> ○ Within 6 months of any exceedance of a threshold criterion, submit to the DAWE for the Minister's approval a Remediation Plan in accordance with Condition 3(b) of the EPBC Act Approval. ○ Submit an Offset Strategy within 10 months of the exceedance of threshold criterion in accordance with Condition 		
<p>Attachment C 2018-8383 Environmental Management Strategy</p>		<p>Management Action 6: Vegetation clearing will be undertaken using GPS location devices that will be clearly flagged with areas beyond the authorised limit flagged as 'No-Go Zones'.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> • No-Go Zone demarcations are installed and maintained to ensure that no clearing outside of the maximum 73.05 ha of listed threatened and migratory habitats is cleared. • The extent of clearing in PEC P1 communities where unavoidable will be recorded and maintained to ensure cumulative clearing extents of this community does not exceed the maximum 0.16 ha 	<p>Compliant</p>	<p>The Project implements a system where live clearing data is uploaded to the Projects GIS portal. Regular checks are completed by the Projects survey team and GIS Specialist.</p> <p>The data includes GPS locations. The GIS handheld systems used onsite during clearing includes the areas which are no-go-zones and beyond clearing limits.</p> <p>No-go-zones are physically demarcated using fencing to ensure protection of threatened and migratory species habitats and to ensure no clearing outside the disturbance footprint.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>Trigger Criterion:</p> <ul style="list-style-type: none"> • Early works encroaching the approved extent of authorised clearing. • Surveying and pegging of P1 PEC not conducted or missing. • No-Go Zone around PEC P1 and heritage areas missing 5m buffer and 3m warning zone. • GPS alarm tripped on virtual geofencing device. • The operator reports to the supervisor any alarm events and is to reassess the location of the clearing boundary and ensure that direction is taken from a suitably qualified environmental representative before resuming GDA. <p>Threshold Criterion:</p> <ul style="list-style-type: none"> • Actual clearing within the development envelope exceeds the approved clearing limit (73.05 ha). • Actual clearing within PEC P1 communities exceeds 0.16 ha. 	<ul style="list-style-type: none"> • Review GPS Mapping against clearing progress daily to ensure adherence with authorised clearing extents. • Relevant traditional owners are to be invited or appropriately facilitated to observe any ground disturbing activities during construction. • Survey markers and temporary fencing to be inspected daily by site supervisors and weekly by PER. • All fencing, including temporary fencing, will exclude the use of barbed wire to minimise risks to the Ghost bat. • Ensure vehicles associated with all ground disturbance activities are to be equipped with live GPS systems that will notify the driver of the clearing boundary (virtual geofencing) where disturbance is not to exceed. • Assessment of survey and geospatial data against GDP's comprising the clearing footprint. • Review of reports from on-ground inspections. 	Compliant	<p>The trigger criteria has not been exceeded during the reporting period.</p> <p>During the reporting period a total of 71.936 ha has been cleared of native vegetation. 1.114 ha, remains out of the 73.05 ha allocated limit.</p> <p>PEC1 clearing within the reporting period is 0.152 ha and did not exceed 0.16 ha.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<ul style="list-style-type: none"> • Survey data converted to Geospatial files will be made available to the PER for desktop review and progress of clearing activities. • Reporting: • Monthly clearing report compiled which compares the progress against the clearing limits both visually (using GIS data) and numerically. • Where threshold criteria is exceeded: <ul style="list-style-type: none"> ○ Report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified in accordance with Condition 5-6 (1) of MS1180. ○ Prepare an additional report to the CEO and the DAWE within twenty-one (21) days of the exceedance being reported as required by Condition 5-6 (5) of MS1180. ○ Within 6 months of any exceedance of a threshold criterion, submit to the DAWE 		

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>for the Minister's approval a Remediation Plan in accordance with Condition 3(b) of the EPBC Act Approval.</p> <ul style="list-style-type: none"> ○ Submit an Offset Strategy within 10 months of the exceedance of threshold criterion in accordance with Condition 		
Attachment C 2018-8383 Environmental Management Strategy		Management Action 7: <ul style="list-style-type: none"> • Vegetation clearing conducted in accordance with an internal permitting procedure to facilitate progressive development. 	Monitoring: <ul style="list-style-type: none"> • GDP process is implemented. • All clearing or ground disturbing activities are conducted with a GDP in place. • Clearing carried out in accordance with the conditions specified in the GDP. 	Compliant	<p>The Project implements a Ground Disturbance Procedure and Permit system.</p> <p>GDPs for clearing will not be issued once the clearing limits have been reached, and this is supervised by the SCJV Environmental team.</p> <p>Clearing progress is tracked in GDP register (45826-HSE-REG-G-1001_GDP) and on the GIS portal.</p>
		Trigger Criterion: <ul style="list-style-type: none"> • GDP not in place prior to clearing or ground disturbance occurring. • Actual and planned clearing within the development envelope exceeds 90% (65.75 ha) of the approved clearing limit. 	<ul style="list-style-type: none"> • Operators, PER and Supervisors review clearing requirements in GDP prior to commencement of clearing or ground disturbance activities. • Audit issued GDPs against clearing and disturbance carried out. • Ongoing monitoring of GDPs 	Compliant	<p>Trigger Criteria have not been exceeded during the reporting period.</p> <p>Clearing extent is 71.936 ha (which is less than 73.05 ha).</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<ul style="list-style-type: none"> • Pre-clearing meeting not carried out with GDP requirements not reviewed prior to clearing activities. • GDP procedures not reviewed prior to clearing activities. • Clearing progress exceeds incremental limits authorised by the GDP. • GDP procedures implemented incorrectly. <p>Threshold Criterion:</p> <ul style="list-style-type: none"> • Actual clearing within the development envelope exceeds the approved clearing limit (73.05 ha). 	<p>in place and those pending.</p> <ul style="list-style-type: none"> • Periodical review of GDP procedure and training around GDP process. <p>Reporting:</p> <ul style="list-style-type: none"> • Monthly clearing report compiled which compares the progress against the clearing limits both visually (using GIS data) and numerically. • Where threshold criteria is exceeded: <ul style="list-style-type: none"> ○ Report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified in accordance with Condition 5-6 (1) of MS1180. ○ Prepare an additional report to the CEO and the DAWE within twenty-one (21) days of the exceedance being reported as required by Condition 5-6 (5) of MS1180. ○ Within 6 months of any exceedance of a threshold criterion, submit to the DAWE for the Minister's 		

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>approval a Remediation Plan in accordance with Condition 3(b) of the EPBC Act Approval.</p> <ul style="list-style-type: none"> ○ Submit an Offset Strategy within 10 months of the exceedance of threshold criterion in accordance with Condition 		
<p>Attachment C 2018-8383 Environmental Management Strategy</p>		<p>Management Action 8:</p> <ul style="list-style-type: none"> • Bury concrete or steel structures of a suitable size to a suitable depth where practicable in the rock batters used to elevate and stabilize the plant to create potential day time or maternity roosts. 	<p>Monitoring: Where structures are used to stabilise rock batters, implement design features where possible to provide roosting sites potentially used by avifauna around The Project site.</p> <p>Reporting:</p>	<p>Not Applicable</p>	<p>Construction of concrete and steel structures did not commence during the reporting period.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>Trigger Criterion:</p> <ul style="list-style-type: none"> Roosts within rock batters not included in the design phase of Project. <p>Threshold Criterion:</p> <ul style="list-style-type: none"> Roosts within rock batters not installed during construction phase of Project. 	<ul style="list-style-type: none"> Recording avifauna sightings using the artificial roosts in the Fauna Interaction Register. All fauna interactions recorded in the Fauna Interaction Register are reported in the Monthly Project Environmental Reporting. Where threshold criteria is exceeded: <ul style="list-style-type: none"> Report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified in accordance with Condition 5-6 (1) of MS1180. Prepare an additional report to the CEO and the DAWE within twenty-one (21) days of the exceedance being reported as required by Condition 5-6 (5) of MS1180. Within 6 months of any exceedance of a threshold criterion, submit to the DAWE for the Minister's approval a Remediation Plan in 	<p>Not Applicable</p>	<p>Trigger is not applicable during the reporting period, as the design is not finalised.</p> <p>Threshold is not applicable during the reporting period.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>accordance with Condition 3(b) of the EPBC Act Approval.</p> <ul style="list-style-type: none"> ○ Submit an Offset Strategy within 10 months of the exceedance of threshold criterion in accordance with Condition 		
Attachment C 2018-8383 Environmental Management Strategy		Management Action 9: Construction and/or clearing within the development envelope will only occur in daylight hours to minimise noise, vibration and artificial lighting impacts on terrestrial fauna.	Monitoring: <ul style="list-style-type: none"> • All construction and clearing is to be carried out during daylight hours. • Ensure the GDP procedures include the details of authorised times to commence clearing. • Review GDP procedures during clearing activities. • Construction team to be inducted with the relevant details of allowable operation times. 	Compliant	All clearing activities have been carried out during the daylight hours in the reporting period. The Project stipulates this requirement within the Ground Disturbance Permit conditions, which is communicated prior, to all relevant personnel involved in clearing. Note: construction of infrastructure did not commence during the reporting period.
		Trigger Criterion: <ul style="list-style-type: none"> • Clearing works conducted 1 hour 		Compliant	The trigger and threshold were not exceeded during the reporting period. The GDP's stipulate

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>prior to dusk (sundown).</p> <p>Threshold Criterion:</p> <ul style="list-style-type: none"> Clearing works conducted after sundown. 	<ul style="list-style-type: none"> Construction and/or clearing occurring after sundown reported as an incident. <p>Incidents reported in writing to the DAWE as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval.</p> <ul style="list-style-type: none"> Where threshold criteria is exceeded: <ul style="list-style-type: none"> Report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified in accordance with Condition 5-6 (1) of MS1180. Prepare an additional report to the CEO and the DAWE within twenty-one (21) days of the exceedance being reported as required by Condition 5-6 (5) of MS1180. Within 6 months of any exceedance of a 		<p>clearing must commence during daylight hours and not after sundown.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>threshold criterion, submit to the DAWE for the Minister's approval a Remediation Plan in accordance with Condition 3(b) of the EPBC Act Approval.</p> <ul style="list-style-type: none"> ○ Submit an Offset Strategy within 10 months of the exceedance of threshold criterion in accordance with Condition 		
Attachment C 2018-8383 Environmental Management Strategy		Management Action 10: <ul style="list-style-type: none"> • A fauna spotter will check all open trenches less than two hours after sunrise and before commencing any construction to detect and safely remove any trapped terrestrial fauna. 	Monitoring: <ul style="list-style-type: none"> • Fauna egress infrastructure to be installed within water holding points, trenches and excavations to ensure fauna can escape. • Visual inspections of water holding ponds, trenches, fauna egress, and excavations. • Visual inspections for Pilbara Olive Python and Northern Quoll within plant, equipment and machinery prior to activities being carried out onsite each morning, following rain events and during hot weather. • Visual inspections are to be included in pre-starts. 	Compliant	<p>Excavations onsite during the reporting period, are checked by qualified fauna spotters in accordance with this action (as listed in the Section 40 Authorisation (2223-0317). Fauna spotters record findings and interactions within the Fauna Interaction Register.</p> <p>GDPs stipulate this requirement as do the SWMS for the activities associated with trenching and excavation.</p> <p>Pre-starts and toolbox meetings remind personnel of requirement.</p>
		Trigger Criterion: <ul style="list-style-type: none"> • Conservation significant fauna found in water holding ponds, trenches and excavations. 		Compliant	<p>There were no incidents involving threatened fauna or migratory bird species during the reporting period. As evidenced by the Fauna Interaction Register and the DBCA</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<ul style="list-style-type: none"> • Threshold Criterion: • Fauna death associated with entrapment. 	<ul style="list-style-type: none"> • Fauna identified as trapped within the Project area, will be relocated using a suitably qualified expert using DBCA's Standard Operating Procedures (SOPs) and permit/licence conditions as required under the BC Act. <p>Reporting:</p> <ul style="list-style-type: none"> • Injuries and deaths of threatened fauna or migratory bird species reported as an incident and reported in writing to the DCCEEW as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval. • Recording of all interactions with fauna in the Fauna Interaction Register (for fauna removed or handled). • All fauna interactions recorded in the Fauna Interaction Register are reported in the Monthly Project Environmental Reporting. • Reporting in accordance 		Reporting.

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>with DBCA's Standard Operating Procedures (SOPs) and permit/licence conditions as required under the BC Act.</p> <ul style="list-style-type: none"> • Any conservation Where threshold criteria is exceeded: <ul style="list-style-type: none"> ○ Report the exceedance in writing to the CEO, DCCEEW and DBCA within seven days of the exceedance being identified in accordance with Condition 5-6 (1) of MS 1180. ○ Prepare an additional report to the CEO, DCCEEW and DBCA within twenty-one (21) days of the exceedance being reported as required by Condition 5-6 (5) of MS 1180. ○ Within 6 months of any exceedance of a threshold criterion, submit to the DCCEEW for the Minister's 		

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>approval a Remediation Plan in accordance with Condition 3(b) of the EPBC Act Approval.</p> <ul style="list-style-type: none"> ○ Submit an Offset Strategy within 10 months of the exceedance of threshold criterion in accordance with Condition 3(c) of the EPBC Act Approval, as required. ○ Provide a further report to the CEO, DCCEEW and DBCA within 21 days of the exceedance being reported in accordance with Condition 5-6 (5) of MS 1180. 		
<p>Attachment C 2018-8383 Environmental Management Strategy</p>		<p>Management Action 11:</p> <ul style="list-style-type: none"> • Topsoil will be stockpiled for later use during the rehabilitation of the Project Area. • Vegetation that will be cleared will be stockpiled for later use during rehabilitation of the Project area. 	<p>Monitoring:</p> <ul style="list-style-type: none"> • The first 50mm of topsoil from cleared areas will be retained in permanent or temporary stockpiles for later use during rehabilitation of Project area. • Topsoil will not be stockpiled 	<p>Not Applicable</p>	<p>There was no suitable topsoil or vegetative material identified during clearing. All topsoil and vegetative material was identified as weed-infested and not suitable for use in rehabilitation.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>Trigger Criterion:</p> <ul style="list-style-type: none"> Vegetation and topsoil stockpiles are not located in areas identified in the GDP. Vegetation and topsoil requires double handling to relocate to approved area. Adequate topsoil is not removed (less than 50mm depth). Vegetation and micro-habitat elements are poorly salvaged. Construction activities are commenced prior to PER approval. <p>Threshold Criterion:</p> <ul style="list-style-type: none"> No vegetation is retained from clearing activities. No topsoil is recovered during clearing activities. Topsoil stockpiles are located within drainage lines. 	<p>in excess of 2m in height.</p> <ul style="list-style-type: none"> Topsoil will be adequately signed to ensure ease of identification. Topsoil will be located a sufficient buffer distance from drainage lines and future works to prevent erosion and unnecessary handling. Cleared vegetation will be stockpiled for later use during rehabilitation of The Project area. Appropriate topsoil and vegetation stockpile locations will be identified prior to commencement of construction and clearly identified on GDPs (in map form). Stockpiled vegetation will be stored downslope of the topsoil to increase the erosion protection and sediment control of the topsoil. Stockpiled vegetation will not impede drainage or present a fire hazard. All topsoil and vegetation stockpiles will be surveyed to ensure accurate records of locations and volumes are retained. 	<p>Not Applicable</p>	<p>Trigger Criterion has not been exceeded during the reporting period.</p> <p>Threshold Criterion is not applicable during the reporting period.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<ul style="list-style-type: none"> PER to approve commencement of construction confirming adequate topsoil and vegetation management. <p>Reporting:</p> <ul style="list-style-type: none"> Monthly clearing report will include topsoil and vegetation stockpile locations and volumes (using survey data). Failure to stockpile topsoil or vegetation recorded as an incident. Incidents reported in writing to the DAWE as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval. <p>Where threshold criteria is exceeded:</p> <ul style="list-style-type: none"> Report the exceedance in writing to the CEO and DAWE within seven days of the exceedance being identified in accordance with Condition 5-6 (1) of MS 		

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>1180.</p> <ul style="list-style-type: none"> Prepare an additional report to the CEO and DAWE within twenty-one (21) days of the exceedance being reported as required by Condition 5-6 (5) of MS 1180. Within 6 months of any exceedance of a threshold criterion, submit to the DAWE for the Minister's approval a Remediation Plan in accordance with Condition 3(b) of the EPBC Act Approval. Submit an Offset Strategy within 10 months of the exceedance of threshold criterion in accordance with Condition 3(c) of the EPBC Act Approval, as required. Provide a further report to the CEO and DAWE within 21 days of the exceedance being reported in accordance with Condition 5-6 (5) of MS 1180. 		
<p>Attachment C 2018-8383 Environmental Management Strategy</p>		<p>Management Action 12:</p> <ul style="list-style-type: none"> Site personnel will be inducted to ensure environmental obligations are communicated. Environmental-specific posters displayed in crib rooms and notice boards. Pre-starts to 	<p>Monitoring:</p> <ul style="list-style-type: none"> Monitoring of induction records and training materials to ensure obligations are correctly communicated. 	<p>Compliant</p>	<p>Site personnel are inducted prior to mobilisation to site. The Environmental Induction includes information on all environmental obligations applicable to the Project and requirements within the TSMP.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		include an environmental focus.	<ul style="list-style-type: none"> Inspections to ensure environmental-specific posters are on display. Review of pre-start meeting criteria to include a relevant environmental focus. 		<p>Environmental-specific posters are displayed in crib rooms.</p> <p>Pre-starts include environmental focus relevant to the scope of works, specific activity risks and locations.</p>
	<p>Objective</p> <p>Minimisation of actual or potential impacts to conservation-significant fauna through inadvertent injury and/or mortality as a result of vehicle strikes from increased traffic during construction and operations.</p> <p>Target</p> <p>No impacts to native fauna from Project-related vehicle and equipment movements.</p>	<p>Trigger Criterion:</p> <ul style="list-style-type: none"> Inductions are missing information pertaining to conservation significant species of The Project area or other relevant information that could reduce the risk of vehicle strike. Personnel fail competency assessment. Personnel non-attendance at inductions. <p>Threshold Criterion:</p> <ul style="list-style-type: none"> 10% of relevant project personnel missing induction training. Personnel show non-competency in the field, resulting in an incident. 	<ul style="list-style-type: none"> Inspections of induction and competency registers to monitor for personnel at risk of non-competency of their obligations. <p>Environmental Induction includes:</p> <ul style="list-style-type: none"> Conservation significant species that may occur in The Project area. Key risk times for fauna strikes to occur during dawn and dusk. Speed limit of 20k/h within disturbance footprint. Native fauna has right-of-way. Conservation Significant Fauna identification, habitat, management and reporting requirements for fauna sightings. In particular, the differences between identifying the Pilbara Olive Python and other potentially dangerous snake species. All snake species to be avoided and sightings 	Compliant	<p>Inductions have been prepared to include all relevant regulatory information pertaining to conservation significant species.</p> <p>All site personnel are inducted prior to mobilisation to site. Personnel undergo competency assessments, and an attendance log is maintained.</p> <p>Inductions include native fauna and feral species identification training, emphasizing that all native fauna has right-of-way. Personnel are informed of the key risk times for vehicle strike to fauna. Personnel are informed of local conservation significant fauna species that may be encountered within the Project Area.</p> <p>Threshold and Trigger criteria have not been exceeded during the reporting period.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>notified to the environmental representative and recorded on the fauna interaction register.</p> <ul style="list-style-type: none"> • Consequences and penalties that will apply for non-compliance with legislative provisions. • Posters to be posted in crib rooms and notice boards to raise awareness of environmental obligations. • Pre-starts include an environmental focus including the risk of vehicle strike and the restrictions on personnel to prevent incidents with native fauna. <p>Where threshold criteria is exceeded:</p> <ul style="list-style-type: none"> • Report the exceedance in writing to the CEO and DCCEEW within seven days of the exceedance being identified in accordance with Condition 5-6 (1) of MS 1180. • Prepare an additional report to the CEO and DCCEEW within twenty-one (21) days of the exceedance being reported as required by Condition 5-6 (5) of MS 1180. • Within 6 months of any 		

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>exceedance of a threshold criterion, submit to the DCCEEW for the Minister's approval a Remediation Plan in accordance with Condition 3(b) of the EPBC Act Approval.</p> <ul style="list-style-type: none"> Submit an Offset Strategy within 10 months of the exceedance of threshold criterion in accordance with Condition 3(c) of the EPBC Act Approval, as required. Provide a further report to the CEO and DCCEEW within 21 days of the exceedance being reported in accordance with Condition 5-6 (5) of MS 1180. 		
Attachment C 2018-8383 Environmental Management Strategy		Management Action 13: <ul style="list-style-type: none"> Enforced speed limit for construction and operational vehicles travelling within the development envelope. 	Monitoring: <ul style="list-style-type: none"> During construction, random speed observations and checks will be carried out to ensure all vehicles do not exceed the 20 km/h speed limit. 	Compliant	Site Traffic Management plans are updated every two months, citing speed limits. Copies of traffic management plans are supplied in crib rooms. The speed limit enforced onsite is 40 km/per hour.
		Trigger Criterion <ul style="list-style-type: none"> Close calls / near misses with fauna on road networks. Threshold Criterion: <ul style="list-style-type: none"> Construction vehicles exceeding speed limits. 	<ul style="list-style-type: none"> During operations, Site C and Site F speed limits will be set at 10 km/h and 30 km/h respectively. Speed observations will be carried out using hand-held speed detectors and solar powered radar speed signs will be used across the site to 	Compliant	Incidents and or near misses involving vehicles and fauna are reported using the Project incident management system (INX). There have been no incidents or near-misses of fauna onsite. Trigger and threshold criteria have not been exceeded during

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>enforce speed limits and provide awareness to personnel on current speeds.</p> <ul style="list-style-type: none"> All personnel operating vehicles are to have a current valid driver's licence prior to deployment to site. Inductions to be carried out for all new employees prior to commencement on site. <p>Reporting:</p> <ul style="list-style-type: none"> Exceedance of speed limits must be reported as an incident <p>Where threshold criteria is exceeded:</p> <ul style="list-style-type: none"> Report the exceedance in writing to the CEO and DCCEEW within seven days of the exceedance being identified in accordance with Condition 5-6 (1) of MS 1180. Prepare an additional report to the CEO and DCCEEW within twenty-one (21) days of the exceedance being reported as required by Condition 5-6 (5) of MS 1180. Within 6 months of any exceedance of a threshold criterion, submit to the DCCEEW for the Minister's 		<p>the reporting period.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>approval a Remediation Plan in accordance with Condition 3(b) of the EPBC Act Approval.</p> <ul style="list-style-type: none"> • Submit an Offset Strategy within 10 months of the exceedance of threshold criterion in accordance with Condition 3(c) of the EPBC Act Approval, as required. • Provide a further report to the CEO and DCCEEW within 21 days of the exceedance being reported in accordance with Condition 5-6 (5) of MS 1180. 		
Attachment C 2018-8383 Environmental Management Strategy		Management Action 14: Machinery will idle for at least 30 mins, prior to the commencement of vegetation clearing activities.	Monitoring: <ul style="list-style-type: none"> • Implement machinery checks and idling of machinery at prestart meeting. • Fauna spotters to monitor fauna during machinery start up and idle times, recording any species identified. • Operations manager to ensure machinery are idling for no less than 30 mins prior to mobilization of plant. 	Non-Compliant	<p>During the reporting period, the Project was not compliant with this Management Action.</p> <p>The Approval Holder submitted a revised TSMP (PCF 6) to the Department on the 7 February 2024. This revised version has been updated to exclude this Management Action due to its incompatibility with site procedures.</p> <p>The Department did not provide any feedback on the revised TSMP during the reporting period.</p>
		Trigger Criterion <ul style="list-style-type: none"> • Machinery not inspected or started during prestart. 	<ul style="list-style-type: none"> • Operations manager to supervise pre-starts. Reporting:	Non-Compliant	<p>The Project was compliant with the Trigger Criteria. Machinery is routinely inspected during pre-start checks.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>Threshold Criterion</p> <ul style="list-style-type: none"> Machinery not left in idle for 30 minutes before mobilization. 	<ul style="list-style-type: none"> Vehicles mobilized prior to completing 30-minute idle times reported as an incident. Incidents reported in writing to the DAWE as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval. Incidents reported through Monthly Project Environmental Reporting. <p>Where threshold criteria is exceeded:</p> <ul style="list-style-type: none"> Report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified in accordance with Condition 5-6 (1) of MS1180. Prepare an additional report to 		<p>During the reporting period, the Project was not compliant with this Threshold Criteria.</p> <p>The Approval Holder submitted a revised TSMP (PCF 6) to the Department on the 7 February 2024. This revised version has been updated to exclude this Threshold Criteria due to its incompatibility with site procedures.</p> <p>The Department did not provide any feedback on the revised TSMP during the reporting period.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>the CEO and the DAWE within twenty-one (21) days of the exceedance being reported as required by Condition 5-6 (5) of MS1180.</p> <ul style="list-style-type: none"> ○ Within 6 months of any exceedance of a threshold criterion, submit to the DAWE for the Minister's approval a Remediation Plan in accordance with Condition 3(b) of the EPBC Act Approval. ○ Submit an Offset Strategy within 10 months of the exceedance of threshold criterion in accordance with Condition 3(c) of the EPBC Act Approval, as required. 		
<p>Attachment C 2018-8383 Environmental Management</p>		<p>Management Action 15: Roads and tracks to be speed limited. Information signage to be installed.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> • All Project roads and tracks to be speed limited using signposts during construction and operations. 	Compliant	Speed limits are presented to all site personnel within the Perdaman site induction, as well as speed limit signage placed around site and within the onsite traffic management plan (TMP).

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
Strategy		<p>Trigger Criterion</p> <ul style="list-style-type: none"> Signage damaged, missing, incorrectly installed or difficult to interpret. <p>Threshold Criterion</p> <ul style="list-style-type: none"> Construction vehicles exceeding speed limits. 	<ul style="list-style-type: none"> During construction, random speed observations and checks will be carried out to ensure all vehicles do not exceed the 20 km/h speed limit. During operations, Site C and Site F speed limits will be set at 10 km/h and 30 km/h respectively. Additional signposts containing information relating to the risk of fauna interactions (vehicle strike) in areas where conservation significant fauna may be present. Locations for additional signposts will be identified during construction and where applicable included in the final road marking design. Signposts to be regularly checked to ensure they are upright and remain visible. Personnel inducted to correctly interpret fauna signage. <p>Reporting:</p> <ul style="list-style-type: none"> Exceedance of speed limits reported as an incident. <p>Where threshold criteria is exceeded:</p> <ul style="list-style-type: none"> Report the exceedance in writing to the CEO and 	Compliant	<p>Incidents are recorded and reported using the Project incident management system (INX). No incidents of speed exceedances have been reported within the reporting period.</p> <p>Trigger and threshold criteria have not been triggered during the reporting period.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>DCCEEW within seven days of the exceedance being identified in accordance with Condition 5-6 (1) of MS 1180.</p> <ul style="list-style-type: none"> • Prepare an additional report to the CEO and DCCEEW within twenty-one (21) days of the exceedance being reported as required by Condition 5-6 (5) of MS 1180. • Within 6 months of any exceedance of a threshold criterion, submit to the DCCEEW for the Minister's approval a Remediation Plan in accordance with Condition 3(b) of the EPBC Act Approval. • Submit an Offset Strategy within 10 months of the exceedance of threshold criterion in accordance with Condition 3(c) of the EPBC Act Approval, as required. • Provide a further report to the CEO and DCCEEW within 21 days of the exceedance being reported in accordance with Condition 5-6 (5) of MS 1180. 		
Attachment C		Management Action 16: All non-essential vehicle	Monitoring:	Compliant	During the reporting period, activities associated with the

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
2018-8383 Environmental Management Strategy		movements will be scheduled to take place during the day to reduce likelihood of vehicle strikes.	<ul style="list-style-type: none"> Vehicle movements to be limited to daylight hours unless considered essential to reduce the likelihood of fauna interaction. 		Project were conducted during daylight hours only.
		<p>Trigger Criterion</p> <ul style="list-style-type: none"> Non-essential vehicle movement taking place after sundown resulting in interaction with native fauna (vehicle strike). 	<ul style="list-style-type: none"> Environmental Induction will include definition of “essential vehicle movements”. Environmental focus presented at pre-start at the beginning of every shift. <p>Reporting:</p> <ul style="list-style-type: none"> Any Pilbara Olive Python fauna deaths and injuries will be reported to the Department of Biodiversity, Conservation and Attractions (DBCA) in accordance with BC Act Section 40 Authorisation. Injuries and deaths of Pilbara Olive Python reported as an incident and reported in writing to the DCCEEW as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC 	Compliant	Trigger criterion was not exceeded during the reporting period (there were no reported vehicle strikes after sundown).

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>Act Approval.</p> <ul style="list-style-type: none"> Incidents reported through Monthly Project Environmental Reporting. Threshold Exceedance Reporting as per TSMP. 		
<p>Attachment C</p> <p>2018-8383 Environmental Management Strategy</p>		<p>Management Action 17:</p> <p>All vehicles must remain on designated roads and tracks within Project area.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> All habitat exclusion zones, including the Samphire Shrubland, Supratidal Flats and Drainage habitats to be demarcated using fencing and signage to ensure protection of the exclusion zone. 	Compliant	Incidents are recorded and reported using the Project incident management system (INX). There were no incidents reported relating to vehicles off designated roads and tracks. This requirement is communicated in the Project induction.
	<p>Objective</p> <p>Minimisation of actual or potential impacts to conservation-significant fauna through inadvertent injury and/or mortality as a result of vehicle strikes from increased traffic during construction and operations.</p> <p>Target</p>	<p>Trigger Criterion:</p> <ul style="list-style-type: none"> Fencing and signage of exclusion zones damaged, missing or incorrectly installed. <p>Threshold Criterion:</p> <ul style="list-style-type: none"> Unauthorised access to exclusion zones and access tracks. 	<ul style="list-style-type: none"> Only vehicles approved through the GDP process are to venture off designated roads and tracks within The Project area. Environmental Induction to include information on exclusion zones and access limitations to personnel. Environmental focus presented at pre-start at the beginning of every shift. <p>Reporting:</p> <ul style="list-style-type: none"> Driving off designated roads and tracks without prior approval recorded as an incident. Incidents reported through 	Compliant	Trigger and Threshold have not been exceeded during the reporting period. All fencing is intact (and there was no evidence of unauthorised entry into exclusion zones, areas during the June 2024 Site Audit.

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
	No impacts to native fauna from Project-related vehicle and equipment movements.		<p>Monthly Project Environmental Reporting.</p> <ul style="list-style-type: none"> Incidents reported in writing to the DAWE as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval. Threshold Exceedance Reporting as per TSMP. 		
<p>Attachment C 2018-8383 Environmental Management Strategy</p>		<p>Management Action 18: All fauna injuries or death attributed to vehicle strike will be managed humanely.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Injured animal shall be taken to an authorised veterinarian or trained wildlife carer, or if not possible, humanely euthanized in accordance with DBCA SOPs. Roadkill will be moved at least 10 m into surrounding vegetation, when safe to do so to avoid further strikes of fauna feeding on carcass. Photographic records of roadkill will be retained in the Fauna Interaction Register. Pre-starts to include an 	Compliant	<p>All severely injured native fauna during clearing (i.e. vehicular strikes) were humanely euthanised as per the requirements of the s. 40 license.</p> <p>There were no deaths or injuries to conservation significant species during the reporting period.</p> <p>Relevant information is recorded within the Projects Fauna Interaction Register.</p> <p>Fauna injured or killed by vehicle strike is reported as an incident in the INX system.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>Threshold Criterion</p> <p>Injury or death of conservation significant fauna.</p>	<p>environmental focus including the appropriate management of injured or killed fauna caused by vehicle strike.</p> <ul style="list-style-type: none"> • Inductions to be carried out for all new employees prior to commencement on site. <p>Reporting:</p> <ul style="list-style-type: none"> • Recording of all interactions with fauna in the Fauna Interaction Register (for fauna killed or injured by vehicle strike). • Fauna injured or killed by vehicle strike will be reported as an incident. • Incidents reported through Monthly Project Environmental Reporting. • Any threatened fauna deaths and injuries will be reported to the Department of Biodiversity, Conservation and Attractions (DBCAs) in accordance with BC Act. • Injuries and deaths of threatened fauna reported as an incident and reported in writing to the DCCEEW as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC 	Compliant	There were no deaths or injuries to conservation significant species during the reporting period.

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval.</p> <ul style="list-style-type: none"> Threshold Exceedance Reporting as per TSMP. 		
Attachment C 2018-8383 Environmental Management Strategy	Objective Minimisation of actual or potential impacts to conservation-significant fauna through inadvertent attraction or introduction of feral animals and/or weeds. Target No impacts to native fauna from Project-related feral animal introductions or increase attraction.	Management Action 19: Domestic animals and/or pets will not be permitted within The Project area.	Monitoring: <ul style="list-style-type: none"> Personnel will not be permitted to allow domestic animals within The Project area. 	Compliant	Review of the Fauna Interaction Register which is kept up to date, showed no evidence of domestic animals or pets on fauna register.
		Trigger Criterion Domestic animal present outside The Project area or at nearby personnel camps / living compounds. Threshold Criterion Domestic animal present on site.	<ul style="list-style-type: none"> Feral cats and dogs observed in The Project area are not to be fed by personnel. Inductions to be carried out for all new employees prior to commencement on site to advise on the requirement. Reporting: <ul style="list-style-type: none"> Recording of domestic animals present in The Project area in the Fauna Interaction Register. Presence of domestic animals in The Project area will be reported as an incident. Incidents reported through Monthly Project Environmental Reporting. 	Not applicable	No reported observations of domestic animals on site during the reporting period. No camps close to site, the nearest one is located approximately 7 kms away. Threshold criteria has not been exceeded.

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<ul style="list-style-type: none"> Threshold Exceedance Reporting as per TSMP. 		
Attachment C 2018-8383 Environmental Management Strategy		Management Action 20: Introduce and implement hygiene procedures which result in the reduction of food waste around Project area to reduce the likelihood of introduced/pest species attracted to the facility. All wastes (putrescible, recyclable, non-reusable) will be sent offsite for recycling or disposal.	Monitoring: <ul style="list-style-type: none"> Implementation of the Solid & Liquid Waste Management Sub-Plan 0000-ZA-E-09738 and Solid & Liquid Waste Management Plan PCF-PD-EN-SLWMP to reduce the likelihood of attraction of introduced/pest species to The Project area. Monitoring and management of introduced/pest species will be in accordance with the Pest Management Plan PCF-PD-EN-PMP. Weekly environmental inspections to be carried out to ensure compliance with the requirements. Pre-starts to include an environmental focus including the appropriate management of waste. Inductions to be carried out for all new employees prior to commencement on site. 	Compliant	Waste is collected and stored in a manner that does not attract vermin. Waste is sent offsite for recycling and disposal. An audit of the Project in June 2024, identified the following waste types were being removed from site: <ul style="list-style-type: none"> Sewage, potentially contaminated wastewater, waste oil was transported by Nielsen's Liquid Waste Services (controlled waste carrier) and taken to 7 Mile Landfill in Karratha, with invoices and dockets sighted Other waste types such as recycled waste, contaminated and other types of solid waste were sighted to be enclosed in covered skip bins or wheelie bins at the time of the audit. These are either transported via packaged controlled waste via Nielsen's Liquid Waste Services or by Northwest Alliance (also noted to be a controlled waste carrier).
		Trigger Criterion: Increase in introduced/pest species on site attracted by solid and liquid wastes.	Reporting: <ul style="list-style-type: none"> Threshold Exceedance Reporting as per TSMP. 	Compliant	A Baseline pest animal survey (Pre and Post Wet Season Survey), was conducted by APM. The Survey included a list of introduced species identified in

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>Solid and liquid wastes not managed in accordance with requirements.</p> <p>Threshold Criterion</p> <p>Increase in introduced/pest species at the Project area compared with baseline survey recordings.</p>			<p>the field, and acts as the Projects baseline data. Data from the Projects Fauna Interaction Register is compared with the baseline data to determine if there has been an increase in pest species onsite.</p> <p>There has been a new detection of the exotic pest Red Dwarf Honeybee within the Burrup Peninsula, which is a declared pest species.</p> <p>The Project has been consulting with DPIRD regarding the pest. A Quarantine Area has been declared for the Burrup Peninsula.</p> <p>Posters have been put up about the red dwarf honeybee in crib rooms and toolboxes have been run on the pest species. It should be noted that the Red Dwarf Honeybee has been sighted onsite in small numbers and is being controlled and managed in accordance with DPIRD regional manager directions and advice.</p> <p>To date vegetation cleared onsite has been buried. If any further vegetation is to be cleared onsite, DPIRD have advised that the vegetation should remain onsite for DPIRD inspectors to sight the vegetation for any of the species.</p>
Attachment C		<p>Management Action 21:</p> <p>All general-purpose bins will be</p>	Monitoring:	Compliant	As sighted on the Site Audit in June 2024, all bins and skip bins

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
2018-8383 Environmental Management Strategy		lidded and emptied regularly to ensure the lids remain completely shut.	<ul style="list-style-type: none"> Implementation of the Solid & Liquid Waste Management Sub-Plan 0000-ZA-E-09738 and Solid & Liquid Waste Management Plan PCF-PD-EN-SLWMP to reduce the likelihood of attraction of introduced/pest species to The Project area. All waste containers are to have lids which are to always remain closed. No overfilling of bins will be permitted. Monitoring for fauna (i.e. mice, birds, cockroaches etc.) feeding from the waste receptacles. Inductions to be carried out for all new employees prior to commencement on site to advise on the requirement. 		<p>were observed to have lids or covers. Personnel are encouraged and reminded to keep the lids/ covers shut or closed at all times. Waste receptables and waste areas are inspected weekly, using the Environmental Weekly checklist.</p> <p>Bins and skips are on a regular basis taken offsite by appropriate waste contractors, with receipts and invoices sighted as part of the June 2024 Site Audit.</p> <p>The Solid & Liquid Waste Management Sub-Plan 0000-ZA-E-09738 and Solid & Liquid Waste Management Plan PCF-PD-EN-SLWMP have been implemented and audited during the reporting period, with no non-conformances identified.</p>
	<p>Objective</p> <p>Minimisation of actual or potential impacts to conservation-significant fauna through inadvertent attraction or introduction of feral animals and/or</p>	<p>Trigger Criterion:</p> <ul style="list-style-type: none"> Waste receptacles nearing or breaching capacity weekly. Spills from bins due to improper concealment. Fauna opportunistically feeding from waste receptables. Waste receptacles attracting nuisance species. 	<p>Reporting:</p> <ul style="list-style-type: none"> Fauna interactions will be recorded in the Fauna Interaction Register. Threshold Exceedance Reporting as per TSMP. 	Compliant	<p>No incidents have been reported in the INX system indicating any of the trigger criterion.</p> <p>Trigger Criteria 21 has not been exceeded. The Fauna Interaction Register does not indicate the presence of nuisance species due to waste disposal.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
Attachment C 2018-8383 Environmental Management Strategy	weeds.	Management Action 22: Develop a Cane Toad Monitoring and Management Plan, including controls for potential future implementation	Monitoring: <ul style="list-style-type: none"> Monitoring and management of cane toads will be in accordance with the Pest Management Plan. If required prepare a Cane Toad Monitoring and Management Plan that includes requirements within the TSMP for this MA 22. Undertake mitigation activities to protect identified species. Work collaboratively to eradicate any individual or small groups of cane toads discovered more than 50km ahead of the main cane toad front, where feasible. Develop and implement quarantine procedures for vehicles and equipment to detect hitchhiker cane toads. Regularly review public information aimed at minimising the accidental movement of cane toads. Facilitate toad musters when feasible and/or promote community cane toad collection to contribute to conditioned taste aversion projects. Partner with Aboriginal 	Not Applicable	A cane toad Monitoring and Management Plan has not been required to be prepared during the reporting period.
	Target No impacts to native fauna from Project-related feral animal introductions or increase attraction.	Trigger Criterion: Cane toad front is likely to advance to The Project area within 12 months. Threshold Criterion: Cane toad occurrence on site.		Not Applicable	There have not been any cane toad sightings or interactions identified on site during the reporting period, as confirmed following review of the Fauna Interaction Register.

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>Ranger groups to manage cane toads.</p> <ul style="list-style-type: none"> Investigate the application of new control methods for cane toads in the field. Evaluate methods to protect biodiversity assets from cane toads through exclusion. Promote humane methods of cane toad euthanasia and disposal. Deliver education and information on cane toads and their management. <p>Reporting:</p> <ul style="list-style-type: none"> Recording of all interactions with fauna in the Fauna Interaction Register (for cane toad sightings/capture). Presence of cane toads in Project area will be reported as an incident. Threshold Exceedance Reporting as per TSMP. 		
<p>Attachment C 2018-8383 Environmental Management Strategy</p>		<p>Management Action 23: Conduct baseline and annual feral fauna surveys and implement control measures for feral dogs, cats, foxes, pigs and cane toads within Project area.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> During operations, site perimeter fencing limit/hinder feral fauna from accessing The Project site and will need to be inspected 	<p>Compliant</p>	<p>Baseline pest animal surveys (Pre and Post Wet Season Survey) were conducted by APM at the Project Area in 2018/2019, which included a database search for pests and introduced species and information about pest species</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>for integrity.</p> <ul style="list-style-type: none"> During construction, good housekeeping, site hygiene and reporting will be required to manage and control feral fauna. Feral fauna surveys will be carried out in accordance with the Pest Management Plan PCF-PD-EN-PMP. 		<p>noted during the field survey.</p> <p>As no feral dogs, cats, foxes, pigs or cane toads have been sighted or recorded within the Fauna Interaction Register, within the reporting period, there has been no requirement to implement annual feral fauna surveys, therefore this part of the management action is not applicable.</p>
		<p>Trigger Criterion: Feral animals observed within the Project area.</p> <p>Threshold Criterion Threatened species are injured or killed as a direct result of feral animals within The Project area.</p>	<ul style="list-style-type: none"> Baseline pest animal surveys will be undertaken for two years to understand the extent and nature of pest animals inhabiting or utilising The Project site by a suitably experienced ecologist. Surveys will occur annually until the desired level of control is reached. Ongoing monitoring will be carried out by all personnel through records of sightings in the fauna register. <p>Reporting:</p> <ul style="list-style-type: none"> Any threatened species fauna deaths and injuries will be reported to the Department of Biodiversity, Conservation and Attractions (DBCA) in accordance with BC Act. Injuries and deaths threatened species reported as an incident and reported 	<p>Not Applicable</p>	<p>No feral species have been observed within or around the Project site.</p> <p>There has been no threatened species deaths due to feral species.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>in writing to the DCCEEW as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval.</p> <ul style="list-style-type: none"> Threatened species fauna interactions to be reported to DBCA annually in accordance with BC Act. Threshold Exceedance Reporting as per TSMP. 		
<p>Attachment C 2018-8383 Environmental Management Strategy</p>		<p>Management Action 24: Conduct baseline and annual weed surveys and implement control measures comprising manual removal, herbicide treatment and stockpile containment for weeds within Project area.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Weed monitoring and management will be carried out in accordance with the Weed Management Plan PCF-PD-EN-WMP and Weed Management Sub-Plan 0000-ZA-E-09739. A baseline weed mapping survey within The Project footprint and adjacent areas will be undertaken before civil works to establish a baseline of the habitat condition, type of weeds found and the extent of their population. 	Compliant	<p>It should be noted that there is a typographical error in the MA – which should say ‘biennial’ rather than annual weed surveys, as per the supporting document listed which is the Weed Management Plan (PCF_PD_EN_WMP). The WMP states that a baseline weed survey will be conducted and thereafter biennial surveys (see section 8.1 of the WMP). The fact that ‘annual’ is a typographical error is made more apparent by the fact that monitoring the action requires biennial surveys (stated twice).</p> <p>A Baseline Weed Survey was conducted by Trace Archaeology and Ecology (Trace) in March 2023.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>Trigger Criterion</p> <p>Introduction and/ or increase in abundance of significant weed species in Project area.</p>	<ul style="list-style-type: none"> • Biennial weed survey and mapping will be undertaken within The Project footprint to record the type and distribution of the weed species. • Surveys to be carried out biennially. <p>Reporting:</p> <ul style="list-style-type: none"> • A weed register will include the following records: <ul style="list-style-type: none"> ○ All records of weeds observed within The Project boundary. ○ Records of weeds disposed offsite and at licensed disposal facilities. ○ Monitoring of material used for onsite mulching for weed and/or weed propagules. ○ Records of herbicide applications and other weed control measures applied within The Project boundary. 	<p>Not Applicable</p>	<p>The Project implements weed management and control measures including the implementation of the Weed Management Plan PCF-PD-EN-WMP and Weed Management Sub-Plan 0000-ZA-E-09739.</p> <p>A suitably qualified weed control contractor, <i>Flick Anticimex</i>, has developed a weed spraying program for the Project.</p> <p>The Project included a washdown bay and vehicle inspection area during the reporting period.</p> <p>As per the Projects' Weed Management Plan, a Biennial weed survey will be conducted for the Project in September 2024 (outside the reporting period for this ACR).</p> <p>MA 24 will be revised to ensure it is consistent with the biennial monitoring requirements within the Weed Management Plan PCF-PD-EN-WMP.</p> <p>Next biennial survey is planned for October 2024, well within the biennial time period.</p> <p>The entire Project area has been classed as weed infested. The Project's footprint has been cleared of all vegetation in accordance with clearing limits, and there has been no instance introduction and/ or increase in abundance of significant weed species in Project area.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
Attachment C 2018-8383 Environmental Management Strategy		Management Action 25: Prevent weeds on topsoil and vegetation stockpiles.	Monitoring: <ul style="list-style-type: none"> Weed monitoring and management will be carried out in accordance with the Weed Management Plan PCF-PD-EN-WMP and Weed Management Sub-Plan 0000-ZA-E-09739. Monitoring of contaminated topsoil via the Material Tracking Register. 	Not Applicable	There were no stockpiles of topsoil or vegetative material on site during the reporting period, due to the large presence of weeds and the risk of spreading weeds further should such stockpiles be maintained on site. The project area has been deemed weed infested and therefore topsoil is not found to be appropriate for re-use or rehabilitation onsite.
	Objective Minimisation of actual or potential impacts to conservation-significant fauna through inadvertent attraction or introduction of feral animals and/or weeds. Target No impacts to native fauna from Project-related feral animal introductions or increase attraction.	Trigger Criterion Weeds occurring in stockpiles and disturbed areas. Threshold Criterion Weeds in proliferation and impacting success of native vegetation.	<ul style="list-style-type: none"> Inspections to ensure stockpiles are correctly signed, banded and stored. Inductions will train personnel to identify weed species who will have responsibility of notifying the Environment and Heritage Manager of sighted weeds. Reporting: <ul style="list-style-type: none"> Reporting to DCCEEW, CEO and DBCA within seven days of the exceedance being identified and as per TSMP where there is a threshold exceedance. 	Not Applicable	Trigger and threshold were not exceeded during the reporting period.
Attachment C 2018-8383 Environmental		Management Action 26: Prevent introduction of weeds into the Project area through implementation of weed hygiene	Monitoring: <ul style="list-style-type: none"> Weed monitoring and management will be carried out in accordance with the 	Compliant	As stated above, the entire Project area has been deemed as weed infested, however weed hygiene measures are being implemented, monitored and audited onsite

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
Management Strategy		measures.	<p>Weed Management Plan PCF-PD-EN-WMP and Weed Management Sub-Plan 0000-ZA-E-09739.</p> <ul style="list-style-type: none"> • Good weed hygiene practices will be followed throughout The Project, including: <ul style="list-style-type: none"> ○ vehicle/plant inspection ○ wash down procedures for all construction plant, ○ light vehicles, scraper bowls and truck trays carrying soil, which are entering and leaving The Project areas ○ dedicated vehicle inspection and wash down areas are to be positioned at site entry / exit points • All heavy vehicles and plant involved in earthworks and civil works will be washed down, inspected and accompanied by an independent certificate of verification of weed hygiene prior to site entry. Upon arrival on site, they will be inspected at the site gate by the PER, or delegate, and documented using the 		<p>regularly in accordance with the Weed Management Plan PCF-PD-EN-WMP and Weed Management Sub-Plan 0000-ZA-E-09739.</p> <p>A suitably qualified weed control contractor, <i>Flick Anticimex</i>, has developed a weed spraying program for the Project.</p> <p>The Project included a washdown bay and vehicle inspection area during the reporting period.</p> <p>Any vehicles coming to site, have a weed and seed certificate, if any vehicles or plant do not meet these checklists, they are rejected from site and asked to wash-down off site.</p>
		<p>Trigger Criterion</p> <p>Weed hygiene measures are not followed for all vehicles and equipment.</p> <p>Introduction and/ or increase in abundance of significant weed species in Project area.</p>	Not Applicable	<p>During the reporting period weed hygiene measures were complied with. The Trigger criterion was not exceeded.</p>	

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>Contractor's Vehicle and Mobile Equipment Weed Inspection Form.</p> <ul style="list-style-type: none"> Prior to the movement or reuse of any soil, borrow, fill or other weed risk material within The Project site, the material is to be certified as free from weeds by conducting and documenting a weed inspection prior to the first movement of material from the source location. The Weed Risk Materials Hygiene Form will be used for this purpose. 		
Attachment C 2018-8383 Environmental Management Strategy		<p>Management Action 27: Weed Risk Areas/Zones are established</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Weed Risk Areas/Zones will be managed in accordance with the Weed Management Plan to ensure there is no spread of weeds from these areas into Project area. 	Not Applicable	The entire site has been classed as weed infested, therefore this MA is not applicable, as there are no identified higher risk zones or areas within the Project site.
		<p>Trigger Criterion Unauthorised access into Weed Risk Areas/Zones. Surveying and pegging of Weed Risk Areas/Zones are missing.</p>	<ul style="list-style-type: none"> Weed Risk Areas/Zones will be demarcated by survey markers and temporary fencing, to be inspected daily by site supervisors and weekly by PER. Weed Risk Areas/Zones will be identified on weed maps and through the Ground Disturbance Permit (GDP) process and shall be treated as avoidance sites wherever 	Not Applicable	The entire site has been classed as weed infested, therefore this MA is not applicable, as there are no identified higher risk zones or areas within the Project site.

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>possible.</p> <ul style="list-style-type: none"> Weed risk areas will inform weed control and weed hygiene requirements. 		
Attachment C 2018-8383 Environmental Management Strategy	<p>Objective</p> <p>Minimisation of actual or potential impacts to conservation-significant fauna through artificial lighting impacts</p> <p>Target</p> <p>No impacts to native fauna from Project-related artificial lighting</p>	<p>Management Action 28:</p> <p>The Project will 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 biological diversity and ecological integrity are maintained.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> To minimise impacts on marine turtles, seabirds and migratory shorebirds, lighting will be monitored and managed in accordance with the Confirmed Light Management Plan PCF-PD-EN-LMP. A benchmark Artificial Light at Night (ALAN) survey will be carried out at selected locations including (but not limited to): <ul style="list-style-type: none"> The Project area Hearson's Cove Deep Gorge, and Locations selected after consultation with MAC. Monitoring will capture benchmark regional artificial light data during new moon conditions. An impact assessment will be carried out using the information from the proposed lighting design, benchmark light monitoring 	Compliant	<p>This management action also relates to the Portside construction works and operational activities, which did not commence during the reporting period.</p> <p>The construction lighting towers on Site C and F are only operated between the hours of 0530 to 0700 and from 1730 to 1900 hours onsite. Which are kept low, shielded and directional.</p>
		<p>Threshold Criterion</p> <p>Failure to implement best practice technology or management actions specified in the Confirmed Light Management Plan.</p> <p>Non-compliance with the requirements of the Confirmed Light Management Plan and/or Light Management Protocol.</p> <p>Marine turtle hatchlings orientation is affected by increased lighting from the Project.</p>	<p>Not Applicable</p>	<p>This Threshold was not exceeded during the reporting period. An Audit of the Construction Environmental Management Plan Light Management Protocol 0000-ZA-E-09071 in June 2024, during the reporting period, noted no non-conformances.</p> <p>Marine turtle hatchlings orientation was not impacted by the current scope of works being conducted on Site C and F during the reporting period. Construction at the Port had not commenced during the reporting period.</p>	

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>program and the modelling.</p> <ul style="list-style-type: none"> The impact assessment will review the Project against the Commonwealth guideline best practice light principles, qualitative assessment of the horizon visibility of sky glow/ direct light sources and the Bortle Class sky quality guide. Details regarding the minimum suitable mitigation measures and best practice lighting design will be included in the impact assessment and will apply to both construction and operational lighting. An ongoing ALAN monitoring program to inform an adaptive management framework to support continuous improvement in light management will be developed and will include one round of post construction monitoring and reporting. Light Management Protocol will be developed as part of the Construction Environmental Management Plan Framework. All Project Personnel working on the Project site will be made aware of the Light Management Plan 		

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>through the site induction. All Contractors undertaking construction works will be provided with a copy of the Light Management Plan.</p> <ul style="list-style-type: none"> • Pre-starts to include an environmental focus including the key elements of the Confirmed Light Management Plan PCF-PD-EN-LMP the Project. • Environmental inspections to assess: <ul style="list-style-type: none"> ○ Attraction of feral species ○ Incidents and interactions with Threatened and / or native species ○ MAC consultation or concerns in relation to heritage places ○ Environmental incidents and corrective action close out. <p>Reporting:</p> <ul style="list-style-type: none"> • Reporting lighting requirements to the Project Director in design reports. • Results of benchmark light monitoring to be reported in Confirmed Light Management Plan PCF-PD- 		

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>EN-LMP.</p> <ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 		
Attachment C 2018-8383 Environmental Management Strategy		<p>Management Action 29:</p> <p>Development and implementation of monitoring program for the cumulative lighting impacts on marine turtle hatchlings, migratory seabirds and shorebirds.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> A benchmark ALAN survey will be carried out over 5 nights during new moon conditions between the 28 Feb 2022 and 4 March 2022 using Sky42 light monitoring equipment that will be deployed at selected locations including (but not limited to): <ul style="list-style-type: none"> The Project area Hearson's Cove Deep Gorge, and Locations selected after consultation with MAC. An ongoing ALAN monitoring program to inform an adaptive management framework to support continuous improvement in light management will be developed and shall include one round of post construction monitoring and reporting. <p>Reporting:</p>	Not Applicable	<p>Development and implementation of monitoring program for the cumulative lighting impacts on marine turtle hatchlings, migratory seabirds and shorebirds has not been required to be undertaken during the reporting period, works within the Portside Area only commenced in August 2024</p> <p>The Project has a Light Management Plan which includes results from the benchmark ALAN survey and a monitoring program to assess and monitor impacts to cultural heritage values as follows:</p> <ul style="list-style-type: none"> The Project area Hearson's Cove Deep Gorge, and Locations selected after consultation with MAC. <p>The results from the ALAN survey, which was conducted between the 28 February and the 4 March 2022 have been included within the Perdaman LMP and Clough's Artificial Lighting Management Plan, in addition further surveys were conducted by Pendoley in April 2023 that specifically to assessed potential impacts of the</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 		artificial lighting sources that the SCJV has proposed during construction.
	<p>Objective Minimisation of actual or potential impacts to conservation-significant fauna through noise,</p>	<p>Threshold Criterion</p> <ul style="list-style-type: none"> Failure to implement monitoring program. Light Management Plan PCF-PD-EN-LMP requires review and amendment as a result of the findings of the monitoring program. 		Not Applicable	<p>Development and implementation of monitoring program for the cumulative lighting impacts on marine turtle hatchlings, migratory seabirds and shorebirds has not been required to be undertaken during the reporting period.</p> <p>Light Management Plan PCF-PD-EN-LMP was reviewed and amended as a result of the findings of the monitoring program. The LMP was updated from PCF2 to PCF4 to include the latest Pendoley Light Modelling and impact assessment.</p> <p>The Monitoring Program has not yet been developed and will not be implemented for the reporting period, as potential cumulative lighting impacts on marine turtle hatchlings, migratory seabirds and shorebirds are not envisaged until construction works (Portside) commence with potential for associated nightworks and more specifically lighting associated with the operational phase of the Project.</p> <p>During the reporting period the Project did not require the use of Artificial lighting for nightworks. Lighting that was available to use during the reporting period, included specific controls to</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
	vibration, dust and fire				mitigate potential impacts to wildlife as detailed within the <i>PERDAMAN UREA PROJECT: ARTIFICIAL LIGHT MANAGEMENT PLAN</i> .
Attachment C 2018-8383 Environmental Management Strategy	Target impacts to native fauna from Project-related to noise and vibration emissions	Management Action 30: The Project will avoid, where possible, and otherwise use best practice technology and risk-based management actions to minimise the impact of noise and vibration from the Project so that biological diversity and ecological integrity are maintained.	Monitoring: <ul style="list-style-type: none"> Noise complaints will be monitored to ensure compliance with the noise regulations and investigated to determine any adverse impacts, including towards fauna occurring near or adjacent the complaint source location. Monitoring of the fauna interactions register to determine avoidance patterns in species. Fauna monitoring in the Environmental Performance Report will determine the location of sightings from baseline surveys and compare in each report to determine any site avoidance behaviours potentially arising from noise and vibration. Monitor reports or incident of noise and/or vibration emissions and orientation from the Project. Reports or incident of noise and/or vibration emissions and the noise orientation. 	Compliant	The Project implements a Construction Environmental Management Plan that includes Noise Management Protocol. There have not been any incidents recorded in the INX system. The Project carried out noise and vibration monitoring during the reporting period, with no exceedances of noise criterion There is no indication of impacts to fauna following review of inspections and the fauna interaction register.
		Trigger Criterion <ul style="list-style-type: none"> Noise or vibration complaints received. Identification of site avoidance behaviours. Noise exceeds a value which is 5 dB below the assigned level for the area impacted by noise. Threshold Criterion: <ul style="list-style-type: none"> Noise exceeds the assigned level allowable in an area. Noise and/or vibration 		Compliant	The Project carries out both noise and vibration monitoring at locations nearby to blasting and cultural heritage sites. Noise levels are logged on the Projects Environmental test solutions (eagle.io) and exceedances are sent to the Environmental team. There have been with no exceedances of noise criteria during the reporting period. There have been no noise and vibration complaints associated with the Project. The Fauna Interaction register, and INX incident system have not

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>emissions and orientation identified to negatively or adversely impact conservation significant fauna roosting or nesting.</p> <ul style="list-style-type: none"> Noise and/or vibration emissions and orientation identified as a cause of disorientation or displacement of native fauna in the area. 	<ul style="list-style-type: none"> Intrusive noise (including vibration) issues associated with The Project will be managed in compliance with relevant statutory standards and to ensure they do not negatively impact noise sensitive receptors, including native bats, turtles and other threatened fauna species. The Noise Management Protocol included in the Construction Environmental Management Plan provides guidance on how noise emissions from a range of sources including construction equipment, drilling, blasting, piling and commissioning of plant, the conveyor and ship loader, will be minimised. A Noise and Vibration Management Sub-Plan will be prepared which will include the details provided in the protocol and any specific requirements of the Part V approvals in relation to noise emissions. The sub-plan will also consider the requirements to protect heritage values and fauna during construction activities. <p>Reporting:</p>		<p>recorded any incidents of noise negatively or adversely impact conservation significant fauna roosting or nesting.</p> <p>Trigger and Threshold have not been exceeded during the reporting period.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 		
Attachment C 2018-8383 Environmental Management Strategy		<p>Management Action 31:</p> <p>Maintain equipment such that all noise emitting equipment is fully serviceable and working to the correct specifications. High noise and vibratory works will be scheduled for hours least likely to affect conservation significant fauna species.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Mobile plant and equipment will be routinely inspected to ensure noise does not exceed the assigned levels. Equipment to be inspected by a suitable qualified trade (e.g., mechanic) prior to operating on Site. 	Compliant	<p>All noise generating equipment is regularly serviced and maintained in accordance with manufacturers' specifications. High noise and vibratory works were not carried out during the nighttime hours during the reporting period.</p> <p>The Project maintains a maintenance program for equipment, vehicles and plant.</p>
		<p>Trigger Criterion</p> <ul style="list-style-type: none"> Engine / mechanical issues lead to increased noise during operations. Inspections identifying mechanical issues. Engine / mechanical failure of plant. Mechanical issues lead to exceedance of noise and vibration regulations. <p>Threshold Criterion</p> <ul style="list-style-type: none"> > 65 dB(A) at plant boundary (Operations only) 	<p>Reporting:</p> <ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 	Compliant	<p>Trigger criteria has not been exceeded during the reporting period.</p> <p>Threshold criteria does not apply during the reporting period.</p>
Attachment C 2018-8383 Environmental Management		<p>Management Action 32:</p> <p>A review of noise impacts from The Project on terrestrial and marine</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Noise monitoring at sensitive receptors. 	Not Applicable	<p>This Management Action applies to Operations. During the reporting period, operations did not commence.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
Strategy		<p>fauna species will be carried out.</p> <p>Trigger Criterion Noise exceeds a value which is 5 dB below the assigned level for the area impacted by noise.</p> <p>Threshold Criterion > 65 dB(A) at plant boundary (Operations only)</p> <p>Identification of site avoidance behavior from terrestrial fauna and/or marine fauna due to project related noise, including reduced turtle and bird nesting and reduction of roosting migratory bird species.</p>	<ul style="list-style-type: none"> Monitoring of fauna noise avoidance behaviours. Monitoring of fauna occurrences and proximity to site during operations at varied noise levels. <p>Reporting:</p> <ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 	Not Applicable	Not applicable to the construction being carried out during the reporting period.
Attachment C 2018-8383 Environmental Management Strategy		<p>Management Action 33: The Project will avoid, where possible, and otherwise use best practice technology and risk-based management actions to minimise the impact of dust from the Project so that biological diversity and ecological integrity are maintained.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Management of dust at The Project area will be in accordance with the Air Quality Management Plan, Construction Environmental Management Plan Air Quality Management Protocol, Traffic Management Plan and relevant Australian Standards to ensure dust emissions do not negatively impact sensitive receptors. The Air Quality Management Plan will be reviewed and revised to include any specific requirements of the Part V approvals in relation 	Compliant	<p>Dust is managed through the Construction Environmental Management Plan and the Air Quality management Protocol. An audit carried out in June 2024, did not identify any non-conformances with the air quality management protocol.</p> <p>Dust emissions were also monitored through the Cat 12 Works Approval for crushing and screening (W6630) and Licence for crushing and screening (L9426). Noting that the works approval was superseded on 19 March 2024, when the Licence was granted.</p> <p>During the reporting period there were several dust level exceedances recorded on the monitoring equipment, however,</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>to dust emissions. The plan will also consider the requirements to protect heritage values and fauna during construction activities.</p> <ul style="list-style-type: none"> Air emissions during operation of UPP and equipment will be within the Project's approved thresholds. Where monitoring results indicate higher emissions than those stated in the Project's approval conditions, corrective actions must be implemented as soon as practicable to reduce emissions below the permitted level. <p>Reporting:</p> <ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 		<p>following investigations (as required per Licence L9426), it was determined that biological diversity and ecological integrity were maintained. It should be noted that the dust exceedances were not attributed to the crushing and screening activities onsite, following a thorough site investigation process. Further information on this can be found within the L9426 Annual Audit Compliance Report and Annual Environmental Report, submitted to DWER on 24 April 2024.</p>
	<p>Objective Minimisation of actual or potential impacts to conservation-significant fauna through noise, vibration, dust and fire</p> <p>Target impacts to native fauna from Project-related to noise and vibration emissions</p>	<p>Trigger Criterion</p> <ul style="list-style-type: none"> Dust deposition on threatened species habitat. <p>Threshold Criterion</p> <ul style="list-style-type: none"> Population decline, noticeable deaths during monitoring. Dust deposit impacts the health / condition of threatened species habitat. 		Compliant	<p>Trigger and Threshold have not been exceeded. The Project has not attributed to population decline and or deaths due to dust deposition on habitat. The health of habitat has not declined due to dust impacts. Dust impacts are monitored via the dust monitoring program and weekly inspections. Dust emissions are measured at specific locations (determined for high-risk activities with potential to impact habitat, cultural heritage sites and nearby communities) using calibrated equipment. Data is real time and alerts environmental personnel when there is an exceedance.</p>
Attachment C 2018-8383 Environmental Management		<p>Management Action 34: The Project will minimise the risk of fire events related to Project activities so that biological diversity</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> A Bushfire Management Plan has been 	Compliant	<p>Project implements a CEMP and Fire management protocol which is audited quarterly. During the June 2024 internal audit, carried out</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
Strategy		and ecological integrity are maintained.	commissioned as part of the Development Approval from the City of Karratha.		within the reporting period, there were no non-conformances identified.
		<p>Threshold Criterion</p> <ul style="list-style-type: none"> • Fire spreading outside the boundaries of The Project development envelope, affecting the native vegetation values in the Conservation zone in the Murujuga National Park. • Impacts to relationship with MAC and local community. • Loss of Fauna Habitat. • Altered fire regimes result in increased loss or degradation of native vegetation and/ or flora due to fire impacts. 	<ul style="list-style-type: none"> • The management of fire at The Project area will be in accordance with the Bushfire Management Plan, Fauna Management Plan, Flora Management Plan, Emergency Response Management Plan, and Fire Management Protocol, which include provisions to avoid where practicable and otherwise minimise impacts from fire on significant terrestrial fauna species, including short-range endemic fauna and migratory birds. • The Project development site will be cleared of vegetation during the construction phase. The western portion of Site F will be cleared to accommodate laydown and storage areas during the construction phase. Once construction is complete, these areas are expected to return to their natural vegetative state. • A hot work permit procedure will be developed and implemented by Project Personnel. • Smoking confined to 	Compliant	Threshold Criteria has not been exceeded during the reporting period. There have been no fires reported within the site boundaries, and therefore none have spread to native vegetation values in the Conservation zone in the Murujuga National Park, and or impacted the Projects relationship with MAC and the local community

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>designated smoking areas only.</p> <ul style="list-style-type: none"> • All vehicles, buildings, machinery and drill rigs will be fitted with fire extinguishers. • Fire control equipment will be available in fire-risk areas including but not limited to hazardous material storage areas, hot works areas and service trucks. • An adequate number of personnel will be trained in basic fire awareness, fire response and use of fire suppression equipment and on site at all times during Project Works. • No open fires will be permitted on site at any time. • Liaise regularly with the local government authorities regarding fire danger status. • Maintenance on hot machinery will be undertaken in designated cleared areas whenever possible. • Fire breaks will be established and maintained around key infrastructure and active construction sites. • A dust suppression vehicle will be equipped such that it 		

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>is capable of also being used as a fire response vehicle.</p> <ul style="list-style-type: none"> Flammable and combustible materials are to be appropriately stored and isolated at all times in accordance with relevant Australian Standards. Compliance audits and inspections of work areas to ensure potential fuel loads are minimised. Regular inspections and testing of firefighting equipment will be conducted to ensure it is maintained in working order and in test. Vehicle undersides are to be regularly (e.g. at daily pre-starts, during and after use in spinifex areas etc.) checked for any material stuck around the exhaust system, and any identified material removed. Compliance audits and inspections. <p>Reporting:</p> <ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 		
Attachment C 2018-8383 Environmental Management		<p>Management Action 35: The Project will avoid, where possible, and otherwise use best practice technology and risk-based</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Fauna egress infrastructure to be installed within water 	Compliant	The Project implements daily inspections of trenches / excavations and plant and machinery to check for trapped

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
Strategy	<p>Objective</p> <p>Minimisation of actual or potential impacts to conservation-significant fauna through entrapment, poisoning and debris</p> <p>Target</p> <p>No impacts to native fauna from Project-related to through entrapment, poisoning and debris</p>	management actions to minimise fauna entrapment.	<p>holding points, trenches and excavations to ensure fauna can escape.</p> <ul style="list-style-type: none"> Visual inspections of water holding ponds, trenches, fauna egress, and excavations. Visual inspections for Pilbara Olive Python and Northern Quoll within plant, equipment and machinery prior to activities being carried out onsite each morning, following rain events and during hot weather. 		<p>fauna. Inspection checklists were sighted on the June 2024 internal audit to ensure fauna entrapment has not occurred onsite.</p> <p>Fauna trapped is removed by qualified fauna handlers as per the Reg 28 license FR28000358/FR28000417-b and the Section 40 Authorisation (TFA 2223-0317c). However, no fauna entrapment has occurred onsite to date.</p> <p>No deaths due to fauna entrapment have been recorded within the Fauna Interaction Register.</p>
		<p>Trigger Criterion:</p> <p>Conservation significant fauna found in water holding ponds, trenches and excavations</p> <p>Threshold Criterion:</p> <p>Fauna death associated with entrapment</p>	<ul style="list-style-type: none"> Visual inspections are to be included in prestart. Fauna identified as trapped within the Project area, will be relocated using a suitably qualified expert using DBCA's Standard Operating Procedures (SOPs) and permit/licence conditions as required under the BC Act. <p>Reporting:</p> <ul style="list-style-type: none"> Recording of all interactions with fauna in the Fauna Interaction Register (for fauna removed or handled). All fauna interactions recorded in the Fauna Interaction Register are reported in the Monthly Project Environmental 	Not Applicable	<p>Trigger and Threshold criteria have not been exceeded during the reporting period.</p> <p>There have not been any Conservation significant fauna species found in water holding ponds, trenches and excavations.</p> <p>There has not been any fauna deaths associated with entrapment during the reporting period.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>Reporting.</p> <ul style="list-style-type: none"> Reporting in accordance with DBCA's Standard Operating Procedures (SOPs) and permit/licence conditions as required under the BC Act. Any conservation significant vertebrate fauna deaths and injuries will be reported to DBCA within one week of being recorded. Injuries and deaths of conservation significant vertebrate fauna reported as an incident. Incidents reported in writing to the DAWE as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval. Incidents reported through Monthly Project Environmental Reporting. Threshold Exceedance Reporting in accordance with the TSMP. 		

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>Management Action 36:</p> <p>All fauna entrapped in egress will be removed and relocated by qualified personnel and handled in accordance with DBCA SOP's.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> All excavations and fauna egress to be checked within 2 hours of sunrise if left open overnight. Fauna identified as being entrapped will be relocated by trained personnel in accordance with DBCA's SOPs and permit/licence conditions as required under the BC Act. 	Compliant	<p>Environmental personnel and plant and vehicle operators check for trapped fauna first thing in the morning (0700 hours) and record findings using the daily checklists</p> <p>During the reporting period there was no instance of fauna entrapment identified, and no fauna has had to be removed by qualified personnel. The Fauna Interaction Register includes no record of fauna entrapped.</p>
		<p>Trigger Criterion:</p> <ul style="list-style-type: none"> Fauna spotting activities conducted by inexperienced personnel. Procedures for the relocation programs are not in accordance with DBCA SOP's prior implementation. DBCA SOPs not reviewed prior to program implementation. 	<p>Reporting:</p> <ul style="list-style-type: none"> All fauna interactions to be recorded in the Fauna Interaction Register, including the name of the personnel conducting the relocation. Any threatened fauna or migratory bird species deaths and injuries will be reported to the Department of Biodiversity, Conservation and Attractions (DBCA). Injuries and deaths of threatened fauna or migratory bird species reported as an incident and reported in writing to the DCCEEW as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with 	Not Applicable	<p>Trigger and Threshold criteria have not been exceeded during the reporting period.</p> <p>The Project conducts fauna spotting and relocation programs in accordance with Reg 28 license FR28000358/ FR28000417-b and the Section 40 Authorisation (TFA 2223-0317c) (under the BC Act).</p> <p>The Approval Holder was compliant with authorisation and license conditions in the reporting period as reported within the Projects Authorisation 40 Annual Reporting.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval.</p> <ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 		
Attachment C 2018-8383 Environmental Management Strategy		<p>Management Action 37:</p> <p>The Project will avoid, where possible, and otherwise use best practice technology and risk-based management actions to minimise threatened fauna poisoning caused by entrapment within contaminated holding ponds or exposure to chemicals used in the control of mosquitoes.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Where practicable avoid the use of larvicides and adulticides for chemical control of mosquitoes and other pest species. Should larvicide or adulticide be applied, Perdaman will develop a management plan to ensure the protection of native fauna. This plan will include the chemical make-up to be applied, the impacted areas, the seasons and timeframes for application, the potential impact of the chemicals on listed threatened and migratory species and mitigation measures for species' protection. 	Compliant	<p>There has been no instances of fauna poisoning caused by entrapment within contaminated holding ponds or exposure to chemicals used in the control of mosquitoes, during the reporting period.</p> <p>Chemicals stored onsite are locked and sealed within appropriate containment structures, or in banded holding pods in line with best-practice technology and practices.</p>
		<p>Threshold Criterion</p> <p>Fauna death associated with poisoning.</p>	<p>Reporting:</p>	Compliant	<p>This threshold has not been exceeded during the reporting period. This is supported by the Fauna Interaction Register entries.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 		
Attachment C 2018-8383 Environmental Management Strategy		<p>Management Action 38:</p> <p>The Project will avoid, where possible, use best practice technology and risk-based management actions to minimise debris deposition (including litter and Urea dust) within the marine environment.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> The prevention of debris impacting the marine environment will be achieved through implementation of the Solid and Liquid Waste Management Plan, Air Quality Management Plan and the Construction Environmental Management Plan. 	Not Applicable	This Management Action is not relevant during the reporting period as operations have not commenced and debris deposition (including litter and Urea dust) within the marine environment have not been a risk associated with the works being carried out during the reporting period.
		<p>Trigger Criterion</p> <p>Debris is not contained within The Project area and is deposited in the marine environment</p> <p>Threshold Criterion</p> <p>Fauna death associated with debris deposition in the marine environment.</p>	<ul style="list-style-type: none"> Weekly inspections of waste receptacles, stockpiles and chemical storage areas to ensure no contaminated substances or wastes are deposited in the marine environment. Inspection of bunding around stockpiles and chemical storage units to prevent discharges. Weekly inspections of urea dust deposition around the conveyor and urea transport routes. Personnel training and competency records monitored to ensure capabilities present for spill response actions or 	Not Applicable	<p>There have not been any incidents recorded and reported where debris is deposited in the marine environment or where fauna death has occurred due to debris deposited in the marine environment.</p> <p>Trigger and threshold have not been exceeded during the reporting period.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>identification of hazards / incidents relating to solid and liquid wastes.</p> <p>Reporting:</p> <ul style="list-style-type: none"> • Incident reporting if spills, or contaminated runoff identified, or fauna deaths associated with poisoning occurs. • Any conservation significant vertebrate fauna deaths and injuries caused by debris deposition will be reported to DBCA within one week of being recorded. • Injuries and deaths of conservation significant vertebrate fauna reported as an incident. • Injuries and deaths of threatened species reported as an incident and reported in to the DCCEEW as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval. • Threshold Exceedance Reporting in accordance 		

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
	Objective		with the TSMP.		
	<p>Minimisation of actual or potential impacts to conservation-significant fauna through a spill event.</p> <p>Target</p> <p>No impacts to marine and/or terrestrial fauna and habitats from Project-related spill events.</p>	<p>Management Action 39:</p> <p>Spills of chemicals, hazardous materials and wastewater will be prevented from impacting the marine and terrestrial environments.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Spill prevention and management will be in accordance with the Construction Environmental Management Plan, Erosion, Sediment and Surface Water Quality Management Protocol, Spill Response Procedure, Surface Water Management Plan and Hydrocarbons and Hazardous Substances Management Protocol. The Surface Water Quality Management Protocol will be updated to include any Part V conditions around discharges, storage of chemicals and fuels, refuelling and spill management upon approvals and licenses being issued by DWER. Environmental inspections to ensure the integrity of storage facilities and the proper storage requirements are being adhered to in accordance with the relevant Australian Standards. Storage of chemicals and hazardous materials shall not be permitted in the 	Compliant	<p>During an internal site audit, carried out in June 2024, of the Construction Environmental Management Plan, Water Quality, Erosion and Sediment Control Protocol and Hydrocarbons and Hazardous Substances Management Protocol 0000-ZA-E-09071, evidence of a spill that had occurred onsite was identified and it had not been cleaned up as per the required procedures.</p> <p>The spill was within the construction area on constructed and compacted ground and not on natural ground or near any drainage lines, presenting minimal risk to the environment and resulting in no impact to marine and terrestrial environments.</p> <p>Notwithstanding the above, there were four other spill incidents that occurred within the reporting period, on 16 May, 17 May, 20 May and 24 May 2024. Spill procedures were followed, and investigations undertaken for each incident onsite, which were entered into the INX and InControl systems, contained, controlled and remediated. Along with controlled waste documentation kept from Neilson's liquid waste services. The spill response procedures are included within the Perdaman induction and are reiterated regularly in pre-starts</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>supratidal areas or other areas prone to flooding or drainage/runoff. A hazardous material no-go laydown zone map will be developed during the preparation of the emergency response plan.</p>		<p>and toolbox meetings.</p> <p>All hazardous materials are stored on site in accordance with relevant SDS via ChemAlert and have the spill procedure in place for any spills. It is additionally noted that the site has an Emergency Response Management Plan.</p>
<p>Attachment C 2018-8383 Environmental Management Strategy</p>		<p>Trigger criteria</p> <p>Spills or seepage of urea, ammonia, acid gas products in air emissions or liquid forms that are contained within The Project area and do not impact marine and terrestrial environments.</p> <p>Threshold Criterion</p> <p>A spill or seepage of chemicals, hazardous materials and wastewater, including urea, ammonia, acid gas products to air or terrestrial or marine environments that exceed threshold criteria in the Air Quality Management Plan PCF-PD-EN-AQMP or the Confirmed Surface Water Management Plan PCF-PD-EN-SWMP.</p>	<ul style="list-style-type: none"> All surface water discharges on site will be diverted to a purpose-built stormwater facility for containment, treatment and reuse on site. Permanent infrastructure and laydown areas will avoid the higher, steeper areas along the southern boundary of the development envelope and will benefit from perimeter drainage. Run-off will be diverted into appropriate clean water and contaminated water catchment ponds for treatment and subsequent discharge or disposal. Surface water ponds will all benefit from oil interceptors. Compliance audits and inspections in accordance with the Confirmed Surface Water Management Plan PCF-PD-EN-SWMP. Monitoring effectiveness of management measures via Incident report forms. 	Not Applicable	<p>During the reporting period no urea, ammonia, acid gas products in air emissions or liquid forms were contained within the Project area or did not impact marine or terrestrial environments.</p> <p>Trigger Criteria has not been exceeded during the reporting period. As per the above, the majority of spills were cleaned as per procedures and recorded with corresponding investigation report within the INX and InControl systems.</p> <p>Threshold Criteria has not been exceeded during the reporting period.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>Reporting:</p> <ul style="list-style-type: none"> A spill or seepage of chemicals, hazardous materials and wastewater, including urea, ammonia, acid gas products to air or terrestrial or marine environments that exceed threshold criteria in the Air Quality Management Plan or the Surface Water Management Plan reported as an incident. Incidents reported in writing to the DAWE as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval. Threshold Exceedance Reporting in accordance with the TSMP. 		
Attachment C 2018-8383 Environmental Management Strategy		<p>Management Action 40:</p> <p>Spills (overflow) and seepage from brine storage pond and evaporative storage pond will be prevented from impacting the marine and terrestrial environments.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Management and prevention of spills via overflow from the brine storage pond or evaporative storage pond will be in accordance with 	Not Applicable	Management Action is not applicable during the reporting period, as construction of the brine storage pond and evaporative storage pond has not commenced.

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>Trigger criteria</p> <ul style="list-style-type: none"> • Water leaks threatening contamination of urea product. • Hold ponds nearing capacity limits. • Daily inspection checklist not completed. • Monitoring not conducted / missing. <p>Threshold Criterion</p> <ul style="list-style-type: none"> • Spills and / or seepage from brine and / or evaporative storage pond. 	<p>the Surface Water Management Plan, Spill Response Procedure, Erosion, Sediment and Surface Water Quality Management Protocol and Hydrocarbons and Hazardous Substances Management Protocol.</p> <ul style="list-style-type: none"> • The management protocols will be updated to include any Part V conditions upon approvals and licenses being issued by DWER. • Inspections of the capacity and operational integrity of the brine and evaporative storage pond. • Inspections of storage, transfer and loading areas for urea spills and water leaks that may impact urea condition. • Monitoring effectiveness of management measures via Incident report forms. <p>Reporting:</p> <ul style="list-style-type: none"> • Spills via overflow from the brine storage pond or evaporative storage pond as an incident. • Incidents reported in writing to the DAWE as soon as practicable and no later than two business days after 	<p>Not Applicable</p>	<p>Trigger and Threshold are not applicable during the reporting period, as construction of the brine storage pond and evaporative storage pond has not commenced.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval.</p> <ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 		
Attachment C 2018-8383 Environmental Management Strategy		<p>Management Action 41: Spills of hydrocarbons will be prevented from impacting the marine and terrestrial environments.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Hydrocarbon spill prevention and management will be in accordance with the Construction Environmental Management Plan, Erosion, Sediment and Surface Water Quality Management Protocol, Spill Response Procedure, Surface Water Management Plan and Hydrocarbons and Hazardous Substances Management Protocol. The Surface Water Quality Management Protocol will be updated to include any Part V conditions around discharges, storage of chemicals and fuels, refuelling and spill management upon approvals and licenses being issued by DWER. 	Compliant	<p>During an internal site audit, carried out in June 2024, of the Construction Environmental Management Plan, Water Quality, Erosion and Sediment Control Protocol and Hydrocarbons and Hazardous Substances Management Protocol 0000-ZA-E-09071, evidence of a spill that had occurred onsite was identified and it had not been cleaned up as per the required procedures.</p> <p>The spill was within the construction area on constructed and compacted ground and not on natural ground or near any drainage lines, presenting minimal risk to the environment and resulting in no impact to marine and terrestrial environments.</p> <p>Notwithstanding the above, there were four other spill incidents that occurred within the reporting period, on 16 May, 17 May, 20 May and 24 May 2024. Spill procedures</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<ul style="list-style-type: none"> Environmental inspections to ensure the integrity of storage facilities and the proper storage requirements are being adhered to in accordance with the relevant Australian Standards. Storage of hydrocarbons shall not be permitted in the supratidal areas or other areas prone to flooding or drainage/runoff. All surface water discharges on site will be diverted to a purpose-built stormwater facility for containment, treatment and reuse on site. Where possible, permanent infrastructure and laydown areas will avoid the higher, steeper areas along the southern boundary of the development envelope. 		<p>were followed, and investigations undertaken for each incident onsite, which were entered into the INX and InControl systems, contained, controlled and remediated. Along with controlled waste documentation kept from Neilson's liquid waste services. The spill response procedures are included within the Perdaman induction and are reiterated regularly in pre-starts and toolbox meetings.</p> <p>All hazardous materials are stored on site in accordance with relevant SDS via ChemAlert and have the spill procedure in place for any spills. It is additionally noted that the site has an Emergency Response Management Plan.</p>
		<p>Trigger criteria: Spill of hydrocarbons that is contained within The Project area and does not impact marine and terrestrial environments.</p> <p>Threshold Criterion: Spills of hydrocarbons that impacts the marine or terrestrial environments.</p>	<ul style="list-style-type: none"> Run-off will be diverted into appropriate storage units Compliance audits and inspections in accordance with the Surface Water Management Plan. Monitoring effectiveness of management measures via Incident report forms. <p>Reporting:</p> <ul style="list-style-type: none"> A spill of hydrocarbons that impacts the terrestrial or 	Compliant	<p>There were hydrocarbon spills within the reporting period. However, they were contained within the Project area, and did not impact marine or terrestrial environments While it is noted that soil was impacted as a result of the hydrocarbon spill, this impacted area is not considered a terrestrial environment, as the site is now a construction site and workshop. The spill has since been rectified and remediated.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>marine environment reported as an incident.</p> <ul style="list-style-type: none"> Incidents reported in writing to the DAWE as soon as practicable and no later than two business days after becoming aware of the incident, in accordance with Condition 18 of the EPBC Act Approval. Further details of the incident to be provided within 10 days of the incident, in accordance with Condition 19 of the EPBC Act Approval. Threshold Exceedance Reporting in accordance with the TSMP. 		

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
Attachment C 2018-8383 Environmental Management Strategy		<p>Management Action 42:</p> <p>Prevent the degradation of marine water quality due to construction activities (i.e. soil movements, construction of causeway, increased traffic movements while constructing Port facilities).</p> <p>Trigger and Threshold Criterion:</p> <p>Subject to Pilbara Ports Authority Approval Requirements– this section will be updated upon issuing of the approval.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> • Subject to Pilbara Ports Authority Approval requirements (to be issued) – this section will be updated upon issuing of the approval. • The maintenance of marine water quality will be in accordance with the approval granted by the Pilbara Ports Authority. • Impacts on marine water quality will be monitored and managed in accordance with the Construction Environmental Management Plan Water Quality, Erosion and Sediment Control Protocol, and the Confirmed Surface Water Management Plan PCF-PD-EN-SWMP. 	Not Applicable	Construction with the Pilbara Ports Authority (PPA) did not commence within the reporting period; therefore this is not applicable.
Attachment C 2018-8383 Environmental Management Strategy	<p>Objective</p> <p>Ensure that the seawater discharge to Water Corporation's seawater supply pipeline (MUBRL) will not impact</p>	<p>Management Action 43:</p> <p>Monitoring of Multiuser Brine Return Line water quality.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> • Undertake periodic water quality monitoring of plant process water and treated wastewater prior to discharge to the Multiuser Brine Release Line (MUBRL) in accordance with Ministerial Statements 567 and 594, Part V Licence and Solid & Liquid Waste 	Not Applicable	The Multiuser Brine Return Line is not being monitored during the reporting period, as it is not currently in use.
		<p>Trigger criteria</p> <p>Saline water (Brine) does not meet the MUBRL discharge specification.</p> <p>Liquid waste not treated or reused on site requiring disposal.</p>		Not Applicable	Trigger and Threshold Criteria were not applicable during the reporting period.

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
	<p>marine fauna species and habitats, in combination with other future industrial discharges to the MUBRL, will not compromise the ability of the</p> <p>Water Corporation to meet the requirements of Ministerial Statement 594 and the ANZECC and ARMCANZ (2000) species protection level water quality guidelines.</p> <p>Target</p> <p>No impacts to marine fauna and habitats from Project-related changes to water quality.</p>	<p>Threshold Criterion</p> <p>Exceedance of Indicative Wastewater Acceptance Criteria to MUBRL for The Project.</p>	<p>Management Plan PCF-PD-EN-SLWMP.</p> <ul style="list-style-type: none"> • Undertake water quality monitoring of the MUBRL at the saline water pond and at the pipeline monitoring location prior to MUBRL receipt in accordance with the Surface Water Monitoring Plan. • Continuous, in-stream water quality monitoring for process control of relevant parameters. • Campaign monitoring in advance of planned discharge to the MUBRL. Prior to discharge of wastewater to the MUBRL, wastewater is held in a holding basin with discharges planned in advance. These discharges will be undertaken in accordance with a wastewater discharge procedure to be developed under this Solid and Liquid Waste Management Plan. The procedure will ensure that sampling is undertaken sufficiently in advance of planned discharge and to relevant Australian Standards, to enable analysis at a NATA accredited facility and using relevant USEPA (or suitable 		

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>alternative) analytical techniques.</p> <p>Reporting:</p> <ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 		
Attachment C 2018-8383 Environmental Management Strategy	<p>Objective</p> <p>Minimisation of actual or potential impacts to conservation-significant fauna through changes to surface and groundwater quality</p> <p>Target</p> <p>No impacts to marine fauna and habitats from Project-related changes to hydrology.</p>	<p>Management Action 44:</p> <p>Project will be designed, constructed and operated to maintain the quality of groundwater and surface water so that environmental values are protected.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Changes in surface water quality will be monitored and managed in accordance with the Surface Water Management Plan PCF-PD-EN-SWMP. Potential impacts on groundwater levels and quality and subsequent management requirements due to the disturbance of acid sulphate soils are managed through Project Environmental Management Plan PCF-PD-EN-PEMP and the Acid Sulphate Soils Management Plan PCF-PD-EN-ASSMP. Erosion and sediment control measures are provided in the Confirmed Surface Water Management Plan PCF-PD-EN-SWMP and the Construction Environmental Management Plan Water Quality, Erosion and Sediment Control 	Compliant	<p>Design elements have been included in The Project which ensure the water quality values are maintained and protected. For example the causeway has been designed to ensure that Culvert outflow velocities remain less than 1.0 m/s.</p> <p>The construction of the Project infrastructure did not commence during the reporting period.</p> <p>To date baseline groundwater monitoring has commenced on the Project. With the following GME conducted during the reporting period; July 2023, October 2023, May 2024. January 2024 was cancelled due to commencement of construction and the need to relocate monitoring sites. Since then, suitable alternate monitoring sites have been identified and bores installed. GME events continued in May 2024.</p> <p>Surface water monitoring occurred during the reporting period in accordance with Confirmed Surface Water Management Plan PCF-PD-EN-SWMP.</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>Protocol</p> <ul style="list-style-type: none"> The Surface Water Management Plan PCF-PD-EN-SWMP provides a framework which describes how The Project will address, manage, monitor and mitigate impacts to surface water and receiving waterways during construction, operation and decommissioning phases of The Project in accordance with the applicable regulatory requirements, permit obligations and industry best practice. 		<p>The monitoring program has been designed in a manner that identifies to the Project when an exceedance of water quality occurs (either from adopted criteria or baseline data), which then allows the Project to determine if water quality is being maintained during Project activities.</p> <p>Operations have not commenced.</p>
Attachment C 2018-8383 Environmental Management Strategy		<p>Trigger criteria:</p> <p>Exceedance of water quality trigger levels as provided in the Surface Water Management Plan.</p> <p>Exceedance of supratidal flat (Samphire Shrublands) and King Bay Mangrove Community Vegetation assemblages Stress Level 2.</p> <p>Threshold Criterion:</p> <p>Exceedance of water quality threshold levels as provided in the Confirmed Surface Water Management Plan PCF-PD-EN-SWMP.</p> <p>Exceedance of supratidal flat and King Bay Mangrove Community Vegetation assemblages Stress Level 3.</p>	<p>Reporting:</p> <ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 	Not Applicable	<p>There have been no exceedances of trigger criteria and threshold criteria during the reporting period based on monitoring results.</p>
Attachment C 2018-8383		<p>Management Action 45:</p> <p>Brine which does not meet the</p>	<p>Monitoring:</p>	Not Applicable	<p>MA is not applicable during the reporting period; Brine is not being</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
Environmental Management Strategy		MUBRL discharge specification will be sent to the brine evaporation pond.	<ul style="list-style-type: none"> • The brine evaporation pond will be utilised: <ul style="list-style-type: none"> ○ Where brine return is exceeds the Indicative Wastewater Acceptance Criteria as required by Ministerial Statements 567 and 594. ○ To store saline streams in excess of 55,300 mg/l TDS. ○ To store excess stormwater. ○ To collect contaminated chemical sewer streams (other than Amine (an organic compound derived from ammonia by replacement of one or more hydrogen atoms by organic groups)). • The brine evaporation pond will not receive grey water, MDEA or wastewater containing oil. • Where brine is not suitable for disposal via the MUBRL it will be evaporated, and the residual salt will be collected and removed from site using 		produced and sent for discharge.
		<p>Trigger criteria:</p> <p>Saline water (Brine) does not meet the MUBRL discharge specification.</p> <p>Threshold Criterion:</p> <p>Exceedance of Indicative Wastewater Acceptance Criteria to MUBRL for the Project</p>		Not Applicable	Trigger and Threshold is not applicable during the reporting period. Brine was not being produced and sent for discharge.

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
	Objective Minimisation of actual or potential impacts to conservation-significant fauna through changes to surface flows		<ul style="list-style-type: none"> a licenced waste handler. The brine evaporation pond has transfer pumps and reticulation to receive and pump out water to the MUBRL in large storm events. Monitoring of water quality will be in accordance with the Surface Water Management Plan. Weekly inspections of surface water diversions to be carried out, ensuring all run-off sources are diverted to appropriate hold ponds and treated as required. Visual monitoring of brine evaporation pond capacity. <p>Reporting:</p> <ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 		
Attachment C 2018-8383 Environmental Management Strategy	Target No impacts to marine fauna and habitats	Management Action 46: The Project will avoid, where possible, and otherwise use best practice technology and risk-based management actions to prevent contaminated stormwater discharging off site. Where practicable, the site's clean stormwater will be reused within the	Monitoring: <ul style="list-style-type: none"> Regular inspections and audits of stormwater management including sediment basins and ponds. Where possible stormwater will be captured and used for construction activities 	Compliant	The Project has maintained best practice technology and controls, such as ESC's onsite and sediment basins. Potentially contaminated stormwater is not discharged into the environment, it is collected on site, left to evaporate or collected by a controlled waste carrier to an appropriate disposal waste facility.

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
	from Project-related changes to hydrology	<p>process plant.</p> <p>Stormwater potentially contaminated by spills or leaks from process activities (first flush) will be directed to a dedicated sump and then pumped to the saline water pond for pre-treatment, prior to being discharged to the MUBRL or evaporated in an evaporation pond.</p> <p>Trigger criteria:</p> <p>Notable hydrocarbon iridescent sheen within stormwater collection ponds and ponds reaching 75% capacity.</p> <p>Threshold Criterion:</p> <p>Exceedance of water quality trigger levels as provided in the Surface Water Management Plan, stormwater ponds reached 100% capacity and discharging via the emergency spillway / perimeter drains.</p>	<ul style="list-style-type: none"> Potentially contaminated stormwater will not be discharged into the environment. Monitoring of water quality in accordance with the Surface Water Management Plan. Weekly inspections of the surface water diversions, ensuring all run-off sources are diverted to appropriate hold ponds treated according to the potential contaminants therein <p>Reporting:</p> <ul style="list-style-type: none"> Threshold Exceedance Reporting in accordance with the TSMP. 		
Attachment C 2018-8383 Environmental Management Strategy		<p>Management Action 47:</p> <p>The Project will be designed, constructed, and operated to maintain the hydrological regimes of groundwater and surface water so that environmental values are protected.</p>	<p>Monitoring:</p> <ul style="list-style-type: none"> Visual inspection and measurement of backwater or ponding of water. Hydrological monitoring at sites SW1 through to SW6 in accordance with the Surface 	Compliant	<p>Sediment basins, which were being used during the reporting period, did not exceed trigger and threshold.</p> <p>Stormwater collection ponds will not be constructed until the infrastructure construction commences.</p> <p>Design elements have been included in the Project which ensure the water quality values are maintained and protected. For example the causeway has been designed to ensure that Culvert outflow velocities remain less than 1.0 m/s.</p> <p>The construction of the Project</p>

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
			<p>Water Management Plan.</p> <ul style="list-style-type: none"> Monitoring of surface outflow velocities at the culverts of the causeway. The causeway will be built up above the supra-tidal flat area to a road height of approximately 6m AHD with regular culverts to ensure the structure does not impede natural surface water or tidal flows. Monitoring of the construction schedule for the causeway to ensure schedule of works will be completed in the shortest time practicable to minimise impacts to the supratidal flats, King Bay and the King Bay Mangrove Community from obstructed surface water flows. Supplementary hydrogeological studies are to be conducted prior to commencement of construction, to confirm details of groundwater quality, groundwater flow directions, and the depth to groundwater beneath Sites C and F and in the surrounding areas and install groundwater monitoring bores to ensure groundwater contamination can be readily 		<p>infrastructure did not commence during the reporting period.</p> <p>To date baseline groundwater monitoring has commenced on the Project. With the following GME conducted during the reporting period; July 2023, October 2023, May 2024. January 2024 was cancelled due to commencement of construction and the need to relocate monitoring sites. Since then, suitable alternate monitoring sites have been identified and bores installed. GME events continued in May 2024.</p> <p>Surface water monitoring occurred during the reporting period in accordance with Confirmed Surface Water Management Plan PCF-PD-EN-SWMP.</p> <p>The monitoring program has been designed in a manner that identifies to the Project when an exceedance of water quality occurs (either from adopted criteria or baseline data, which then allows the Project to determine if water quality is being maintained during Project activities.</p> <p>Operations have not commenced.</p>
		<p>Trigger criteria:</p> <p>Presence of backwater or ponding of water from the edge of the development envelope over a period of two (2) consecutive days</p>		Not Applicable	Trigger and Threshold Criteria have not been exceeded during the reporting period.

Document Reference	Management Objective /	Key Management Action / Trigger / Threshold	Monitoring and Reporting	Status	Evidence / Justification / Comments
		<p>from the date ponding was identified at distances further than 6 m.</p> <p>Threshold Criterion:</p> <p>Presence of backwater or ponding of water from the edge of the development envelope over a period of two (2) consecutive days from the date ponding was identified at distances further than 10 m.</p> <p>Culvert outflow velocities exceeding 1m/s.</p>	<p>detected and appropriate management measures be implemented.</p> <p>Reporting:</p> <ul style="list-style-type: none"> Reporting to DCCEEW, CEO and DBCA within seven days of the exceedance being identified and as per TSMP where there is a threshold exceedance. 		

5.2 Implementation Summary – Cultural Heritage Management Plan (PCF-PD-EN-CHMP_PCF6,11 May 2022) and (PCF-PD-EN-CHMP_PCF8,9 February 2024)

All management actions and targets have remained the same within the Confirmed Cultural Heritage Management Plan PCF6 and the revised Cultural Heritage Management Plan PCF8, with the exception of Management Action 21.

Table 5 Implementation Summary Cultural Heritage Management Plan

Document Reference	Management Objective	Key Management Action /Commitment	Management Target / Monitoring	Status	Evidence / Justification / Comments
<p>Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6</p> <p>Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8</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>MANAGEMENT ACTION 1</p> <p>No later than two (2) months prior to commencement of civil works, update this CHMP to protect and report all places and Objects on the Land to which the AHA applies. Once approved by the Registrar, the updated CHMP is to be implemented.</p>	<p>CHM TARGET 1</p> <p>CHMP submitted to the Register and approved prior to construction commencing.</p> <p>Monitoring:</p> <p>Environment and Heritage Management responsible for monitoring and update, review of this CHMP.</p> <p>Reporting:</p> <p>Reporting to Project Director in monthly report.</p> <p>Reporting to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) in the EPBC Act approval 2018/8383 Annual Compliance Report (ACR).</p> <p>Reporting to the CEO of EPA in the annual Ministerial Statement 1180 Compliance Assessment Report (CAR).</p>	<p>Compliant</p>	<p>Civil works commenced on 26 June 2024, during the reporting period.</p> <p>CHMP (PCF6) was submitted to Registrar on 18 February 2022. EPA requested changes to the plan which included DLPH comments on 23 February 2022.</p> <p>On 21 March 2022, Perdaman met with DPLH to discuss comments and queries regarding the plan. Final was submitted to DPLH on 26 April 2022.</p> <p>Perdaman received confirmation that the plan meets the requirements from the Registrar on 18 May 2022.</p> <p>The CHMP (PCF 6) was confirmed and approved on the 22 June 2022 by CEO (EPA).</p>

Document Reference	Management Objective	Key Management /Commitment	Action	Management Target / Monitoring	Status	Evidence / Comments / Justification /
				Reporting to the Registrar of Aboriginal Sites annually (s.18 Report). Reporting in the Ministerial Statement 1180 Environmental Performance Report (5-yearly) (EPR).		
Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6 Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8	Avoid, where possible, and otherwise minimise direct and indirect impacts to social, cultural, heritage, and archaeological values within and surrounding the development envelope.	MANAGEMENT ACTION 2 Establish an Aboriginal Heritage Liaison and Dispute Resolution Committee (the Liaison Committee) between MAC and Perdaman for regular meetings, to establish and maintain processes and accountability between the separate parties, and as a reference group for any cultural or development issues that may arise during The Project development and ongoing operations. The Liaison Committee will have representatives from MAC and Perdaman formed prior to the commencement of civil works.		CHM TARGET 2 Development of procedures/processes, and reporting/accountability for the operation of the Committee. Monitoring: Meeting Meetings. Monitor, review procedures and process. Reporting: Reporting to Project Director in monthly report. Reporting as per procedure and process developed. Reporting in the ACR. Reporting in the CAR. Reporting in s.18 Report. Reporting EPR.	Compliant	Quarterly Aboriginal Heritage Liaison and Dispute Resolution Committee (AHLDRC) meetings have been established. These committee meetings also maintain processes and accountability between the separate parties, and as a reference group for any cultural or development issues that may arise during the Project development and ongoing operations.
Section 2 Table 2-1 Objective	Avoid, where possible, and otherwise minimise direct and indirect impacts to social,	MANAGEMENT ACTION 3 The membership, terms of reference,		CHM TARGET 3 Provide these, including MAC's written concurrence,	Compliant	Civil works commenced on 26 June 2024 On the 23 January 2024, the memberships, terms of reference, agreed procedures/processes, and

Document Reference	Management Objective	Key Management Action /Commitment	Management Target / Monitoring	Status	Evidence / Justification / Comments
<p>Based Management Actions & Targets. PCF6 Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8</p>	<p>cultural, heritage, and archaeological values within and surrounding the development envelope.</p>	<p>procedures/processes, and reporting/accountability for the operation of the Liaison Committee must be provided, including written confirmation of MAC's concurrence with these, to the EPA and for matters relating to Matters of National Environmental Significance, the Minister with responsibility for the EPBC Act, no later than 6 months before the commencement of Project civil works for consideration and approval.</p>	<p>to the EPA and the Minister with responsibility for the EPBC Act no later than 6 months before the commencement of Project civil works for consideration and approval subject to the agreement of MAC on a case-by-case basis.</p> <p>Reporting: Reporting to Project Director in monthly report. Reporting as per procedure and process developed. Reporting in the ACR. Reporting in the CAR. Reporting in s.18 Report. Reporting EPR.</p>		<p>reporting/accountability for the operation of the Liaison Committee was provided, including written confirmation of MAC's concurrence with these, to the EPA and the Minister, Therefore, written confirmation was provided to the EPA and Minister within six months prior to the commencement of civil works.</p>
<p>Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6 Section 7 Table 7-1 Objective Based Management</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>MANAGEMENT ACTION 4 Educate Personnel - Engage MAC to provide cultural awareness training on an ongoing basis for all Perdaman employees and contractors, to accompany site inductions for all managers and workers. Where inductions are to be delivered online, engage with MAC to develop an online delivery module, and agree to the commercial arrangements for use of this module.</p>	<p>CHM TARGET 4 Completion of cultural awareness induction by all employees and contractors – 100% completion rate of cultural awareness training by employees and contractors.</p> <p>Monitoring: Monitor employee and contractor cultural awareness training through: Induction module / Training slides and</p>	<p>Compliant</p>	<p>MAC is engaged to provide a cultural heritage induction (online) which personnel must participate in prior to commencing work activities onsite.</p> <p>In addition, Project personnel must participate in a Perdaman Induction which includes cultural heritage matters.</p> <p>All employees of the Project must complete the online induction process before mobilizing to site</p> <p>Personnel records confirm those that have undertaken Perdaman and MAC inductions and this information is</p>

Document Reference	Management Objective	Key Management /Commitment	Action	Management Target / Monitoring	Status	Evidence / Comments / Justification /
<p>Actions & Targets. PCF 8</p>				<p>competency assessment. Attendance registers.</p> <p>Reporting: Reporting to Project Director in monthly report. Reporting as per procedure and process developed. Reporting in the ACR. Reporting in the CAR. Reporting in s.18 Report.</p>		<p>recorded within the Projects INX system.</p>
<p>Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6 Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8</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>MANAGEMENT ACTION 5</p> <p>During detailed design and construction planning, undertake further assessment of risks to refine the ERD level of risk understanding and ensure that risks are managed during the design process and construction planning to levels that are as low as reasonably practical (ALARP).</p>		<p>CHM TARGET 5</p> <p>Risk register demonstrating management of risks to levels that are ALARP.</p> <p>Monitoring: Monitoring of risks identified in the risk assessment and effectiveness of risk avoidance and minimisation measures. Monitor for potential risks not identified in the current risk assessment</p> <p>Reporting: Reporting to Project Director Monthly report. Approval from Project Director Risk Assessment. Reporting in the ACR.</p>	<p>Compliant</p>	<p>The Project has undertaken various risk assessments relating to the design and construction planning and maintain Risk registers that demonstrate risks are managed during the design process and construction planning to levels that are as low as reasonably practical (ALARP). Risk assessments and registers include potential impacts to the heritage values in the Project area and surrounding the Project. Opportunities and mitigation measures are identified in these Risk Assessments and incorporated into management plans and protocols for the Project works. Including within the CHMP, the Construction Environmental Management Plan and the Heritage Management Sub-Plan.</p>

Document Reference	Management Objective	Key Management Action /Commitment	Management Target /	Status	Evidence / Justification / Comments
			Reporting in the CAR. Reporting in s.18 Report. Reporting EPR.		
Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6 Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8	Avoid, where possible, and otherwise minimise direct and indirect impacts to social, cultural, heritage, and archaeological values within and surrounding the development envelope.	MANAGEMENT ACTION 6 Obtain necessary consents pursuant to the AHA to undertake unavoidable salvage.	CHM TARGET 6 Prepare statutory applications to inform and support applications pursuant to s.18 and/or s.16 of the AHA. Salvage and relocate 100% of the approved heritage material in accordance with s.18 Ministerial Conditions and consents and in consultation with MAC.	Compliant	The Project has carried out unavoidable salvage activities under section 18 consent under the AHA 1972. The sites listed in s.18 approved for salvage and relocation were Site ID # 18615, ID 19239 and ID 19874. The Site ID # 18615, ID 19239 and 19874 have all been salvaged and relocated in accordance with s.18 Ministerial Conditions and consents and in consultation with MAC (PUP_ACR2024-013) between the dates 27 April 2023 to 17 May 2023. The Project remains compliant with this Management Action and Target during the reporting period.
Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6 Section 7 Table 7-1 Objective	Avoid, where possible, and otherwise minimise direct and indirect impacts to social, cultural, heritage, and archaeological values within and surrounding the development envelope.	MANAGEMENT ACTION 7 Before undertaking any work that involves ground disturbance, a Ground Disturbance Permit (GDP) will be obtained and include procedures for salvage that allow for the following: Procedures must be included in the GDP to deal with objects within the meaning of Section 6 of the AHA (“Objects”) that will be affected by works associated with	CHM TARGET 7 GDP to include all provisions for heritage salvage in accordance with approval conditions and s.18 of the AHA. Salvage and relocate 100% of the approved heritage material in accordance with s.18 Ministerial Conditions and consents	Compliant	All ground disturbance requires a ground disturbance permit (GDP) to be completed and approved through the Projects GDP Request process. The Salvage works were carried out under an approved GDP (GDP-01). The GDP includes a Map which identifies the “objects” and all the required procedures and conditions to follow during the works. The GDP is signed off by personnel including a MAC representative. Salvage Plans were prepared in

Document Reference	Management Objective	Key Management Action /Commitment	Management Target /	Status	Evidence / Justification / Comments
Based Management Actions & Targets. PCF 8		<p>the Purpose.</p> <p>Assessment of the potential for The Project works to impact on cultural heritage aspects, including the potential unearthing of buried archaeological sites, objects or burials, and to shift surface isolated artefacts from probable impact by the works.</p> <p>Provisions requiring salvage assessment to be undertaken to produce a plan for each physical component of Sites which require salvage. This will be undertaken in conjunction with senior traditional custodian monitors (male for restricted men's sites), and a qualified and experienced archaeologist.</p> <p>Include actions for additional monitoring by a qualified and experienced archaeologist, for the moderate and high-risk areas and all areas within proximity of extant cultural heritage sites. Salvage works will be undertaken under the guidance of senior traditional custodian monitors and a qualified and experienced archaeologist.</p>	<p>Monitoring:</p> <p>Completion of the Perdaman Heritage Salvage Strategy (Attachment F).</p> <p>Environmental Inspections.</p> <p>Invitations / engagement of monitors.</p> <p>Engagement letters to experienced archaeologist.</p> <p>Salvage assessment.</p> <p>Traditional custodian monitors and aboriginal stakeholder groups consultation and engagement.</p> <p>Ground Disturbance Permits (GDPs).</p> <p>Monitoring provisions to ensure all 'Objects' to be affected by works are included in the GDP and procedures provided therein are adequate and effective.</p> <p>Weekly Environmental Inspections.</p> <p>Incident management reports.</p> <p>Actions to consider additional monitoring by a qualified and experience archaeologist.</p>		<p>consultation with MAC and Traditional Owners. Plan requirements are included in the Work Packs prior to any salvage and relocation works being undertaken. Plans included the requirements for Traditional Custodian appointed monitors, a qualified and experienced archaeologist and a qualified and experienced Anthropologist.</p> <p>All actions within the salvage plans were complied with as recorded in the s.18 report back (annual reporting) (PUP_ACR2024-013).</p>

Document Reference	Management Objective	Key Management /Commitment	Action	Management Target / Monitoring	Status	Evidence / Comments / Justification /
				<p>Risk Register reviews.</p> <p>Reporting:</p> <p>Report on salvage and relocation to be provided to Registrar.</p> <p>Reporting to Project Director Monthly report.</p>		
<p>Section 2</p> <p>Table 2-1</p> <p>Objective Based Management Actions & Targets.</p> <p>PCF6</p> <p>Section 7</p> <p>Table 7-1</p> <p>Objective Based Management Actions & Targets.</p> <p>PCF 8</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>MANAGEMENT ACTION 8</p> <p>Where material is salvaged pursuant to an AHA s.18 Ministerial Consent, relevant Conditions relating to provision of a salvage report to the Registrar, must be complied with.</p>		<p>CHM TARGET 8</p> <p>Relevant Salvage Report accurately completed and submitted.</p>	<p>Compliant</p>	<p>Salvage Reports were completed accurately.</p> <p>There are no specific conditions in s.18 that require provision of a salvage report to the Registrar.</p> <p>The AHA s.18 (MIN2021-0354) condition 3 requires an annual written report to the Registrar advising to what extent the purpose has impacted on all or any sites located on the land. This is to include salvage and relocation details.</p> <p>The Project provided DPLH and the Registrar with annual reports using the Report back format in accordance with condition 3.</p>
<p>Section 2</p> <p>Table 2-1</p> <p>Objective Based Management Actions & Targets.</p>		<p>MANAGEMENT ACTION 9</p> <p>Ensure access to culturally significant areas within and surrounding the development envelope is not hindered or made difficult to Traditional Owners and Custodians and continue to make accessible traditional activities and connections with culturally</p>		<p>CHM TARGET 9</p> <p>Access will not be restricted to Traditional Owners and Custodians for their traditional activities and connections with culturally significant areas.</p> <p>The Heritage Access</p>	<p>Not Applicable</p>	<p>There are no culturally significant areas remaining within the development envelope and access is not restricted to areas outside the development envelope. Traditional Owners and Custodians have no need to interact with the project if they wish to visit culturally significant areas surrounding the development</p>

Document Reference	Management Objective	Key Management Action /Commitment	Management Target / Monitoring	Status	Evidence / Justification / Comments
PCF6 Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8		<p>significant areas for traditional Owners and custodians.</p> <p>Ensure all Men's Restricted sites are accessible only through written permission either by the Circle of Elders, the CEO, the Chairperson or the Cultural Advisor.</p> <p>Review of Restricted sites limitation of access measures at notice of an unauthorised / uncontrolled entry.</p>	<p>register must be maintained including written approvals.</p> <p>Monitoring:</p> <p>Letters of permission either by the Circle of Elders, the CEO, the Chairperson or the Cultural Advisor.</p> <p>Heritage Access register.</p> <p>Monitor through incident reports.</p>		<p>envelope, therefore a Heritage Access register has not been required.</p> <p>There have not been any reports, complaints or incidents involving access being hindered to Traditional Owners and Custodians or unauthorised Access to Men's Restricted sites during the reporting period.</p>
Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6 Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8	Avoid, where possible, and otherwise minimise direct and indirect impacts to social, cultural, heritage, and archaeological values within and surrounding the development envelope.	<p>MANAGEMENT ACTION 10</p> <p>Deposition monitoring is proposed under Section 5.4 of the MRAS. Perdaman is committed to being a contributing participant in the MRAS including supporting the proposed deposition monitoring.</p> <p>In harmony with the objectives of the Murujuga Rock Art Strategy (MRAS), and as a contributing participant in the MRAS, enable ongoing assessment of airborne pollutants to monitor their impact on the petroglyphs located on Murujuga and report on these results.</p> <p>Identify the key air pollutants of potential concern and characterise the emissions from The Project and other existing and proposed future industrial emission sources and both existing and proposed future</p>	<p>CHM TARGET 10</p> <p>Compliance with Confirmed Air Quality Management Plan. Compliance with objectives of the Murujuga Rock Art Strategy (MRAS).</p> <p>Reporting:</p> <p>Required reporting within the Confirmed Air Quality Management Plan.</p> <p>Reporting required MRAS – results of airborne pollutants to monitor their impact on the petroglyphs.</p> <p>Reporting to Project Director Monthly report. Reporting in the ACR.</p> <p>Reporting in the CAR. Reporting in s.18 Report. Reporting EPR.</p>	Not Applicable	<p>The AQMP was not required to be prepared, revised and implemented during the reporting period, in accordance with the requirements of the MS1180 condition 2-3.</p> <p>The revised AQMP will include actions to ensure compliance with objectives of the Murujuga Rock Art Strategy (MRAS).</p> <p>Deposition monitoring was not required to commence by Perdaman, during the reporting period.</p> <p>Perdaman is a contributing member of the MRAMP Stakeholder Reference Group, conceived under the MRAS. The MRAMP is developing the Environmental Quality Management Framework, however Environmental Quality Criteria (EQC) was not released during the reporting period.</p>

Document Reference	Management Objective	Key Management Action /Commitment	Management Target /	Status	Evidence / Justification / Comments
		<p>shipping activities within the Murujuga airshed, within the context of the current air emissions inventory for the region.</p> <p>Contribute to the development of an Environmental Quality Management Framework as detailed in the MRAS.</p>			
<p>Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6</p> <p>Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8</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>MANAGEMENT ACTION 11</p> <p>Perdaman to consult with MAC about the Risk Register as an input to the GDP, and the risk mitigation strategies applied to the management of risk related cultural and heritage impacts.</p>	<p>CHM TARGET 11</p> <p>MAC endorses the Risk Register as an input to the GDP, and the risk mitigation strategies applied to the management of risk related cultural and heritage impacts.</p> <p>Monitoring:</p> <p>Monitoring of risks identified in the risk assessment and effectiveness of risk avoidance and minimisation measures. Monitor for potential risks not identified in the current risk assessment.</p> <p>Risk Register review.</p> <p>Mitigation strategies review.</p> <p>Endorsement letter.</p> <p>Reporting:</p> <p>Reporting to Project</p>	<p>Compliant</p>	<p>MAC have endorsed the CHMP (PCF6) which includes the identified risks within the Table 3A Cultural Heritage Risk Assessment.</p> <p>MAC were consulted and signed off on the GDP's during the reporting period, which demonstrate endorsement of the risk mitigation and conditions applied to the identified risks and potential impacts.</p>

Document Reference	Management Objective	Key Management /Commitment	Action	Management Target / Monitoring	Status	Evidence / Comments / Justification /
				<p>Director Monthly report.</p> <p>Reporting in the ACR.</p> <p>Reporting in the CAR.</p> <p>Reporting in s.18 Report.</p> <p>Reporting EPR.</p>		
<p>Section 2</p> <p>Table 2-1</p> <p>Objective Based Management Actions & Targets.</p> <p>PCF6</p> <p>Section 7</p> <p>Table 7-1</p> <p>Objective Based Management Actions & Targets.</p> <p>PCF 8</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>MANAGEMENT ACTION 12</p> <p>Project development activities that cause impact on heritage sites that are not approved by the s.18 consent, MS 1180 or the EPBC approval, to be reported in accordance with the statutory requirements of the regulatory authorities. These may include (but not limited to) impacts caused by: Blasting activity; construction and operations and spillage of potentially corrosive materials.</p>		<p>CHM TARGET 12</p> <p>A copy of any incident reports to be provided to the appropriate regulatory authorities.</p> <p>Monitoring:</p> <p>Monitoring of potentially impacted heritage sites during relevant works.</p> <p>Incident Reporting system.</p> <p>Complaints register.</p> <p>Weekly environmental inspections.</p> <p>Aboriginal Monitors.</p>	Compliant	<p>There have been no incidents relating to impacts on heritage sites that are not approved by the s.18 consent, MS 1180 or the EPBC approval, during the reporting period.</p>
<p>Section 2</p> <p>Table 2-1</p> <p>Objective Based Management Actions & Targets.</p>	<p>Avoid, where possible, and otherwise minimise direct and indirect impacts to social, cultural, heritage, and archaeological values within and surrounding the development</p>	<p>MANAGEMENT ACTION 13</p> <p>Submission of revised management plan and/or the monitoring program in accordance with the statutory requirements of the regulatory authorities.</p> <p>Ensure commencement of any</p>		<p>CHM TARGET 13</p> <p>All amendments to management or monitoring plans are submitted in accordance with the statutory requirements of the regulatory authorities prior to taking effect.</p>	Compliant	<p>On 9 February 2024 Perdaman notified the DCCEEW and DWER (PUP_ACR2024-014) that the CHMP (rev 6) was revised in accordance with MS 1180 condition 9-8 (1) and (2) based on identifying a required change to Management Action 21 within the CHMP (PCF6) in order to prevent a non-</p>

Document Reference	Management Objective	Key Management Action /Commitment	Target /	Status	Evidence / Justification / Comments
PCF6 Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8	envelope.	<p>revised activities do not take place until receipt of written approvals, as required in accordance with the statutory requirements of the regulatory authorities.</p> <p>Replacement of original management plan and monitoring program with the relevant revised plan(s) that have been approved in accordance with the statutory requirements of the regulatory authorities.</p>	<p>Monitoring:</p> <p>Heritage Monitoring Programs applied.</p> <p>Weekly environmental Inspections.</p> <p>Revision of plans and monitoring.</p> <p>Monitoring receipts of approvals.</p>		<p>achievement.</p> <p>The statutory requirements include the W.A. Approval, s.18 consent and the EPBC Approval.</p> <p>The W.A. Approval (MS 1180) condition 98(1) requires that:</p> <p><i>The proponent, in consultation with the Murujuga Aboriginal Corporation:</i></p> <p><i>(1) may review and revise the Confirmed Cultural Heritage Management Plan and submit it to the CEO;</i></p> <p>The revised versions do not require approval under the WA Approval. Condition 9-4 (MS1180) requires the Project to implement the most recent version of the Confirmed Cultural Heritage Plan.</p> <p>The EPBC Approval only requires (condition 5a), that a <i>complete copy of the Cultural Heritage Management Plan to the Department within 10 business days of the approval of any revised version by the CEO.</i></p> <p>Since the WA Approval does not require the revised version to be approved by the CEO, the Approval Holder advises these two conditions contradict each other.</p> <p>Implementation of CHMP PCF8 commenced on 8 February 2024.</p>

Document Reference	Management Objective	Key Management Action /Commitment	Management Target / Monitoring	Status	Evidence / Comments / Justification /
<p>Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6</p> <p>Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8</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>MANAGEMENT ACTION 14</p> <p>Publication of management plan(s) and or monitoring program/s on the Perdaman website within 1 month of being approved unless otherwise agreed in writing by the Federal Minister.</p>	<p>CHM TARGET 14</p> <p>Plans published on Perdaman website within 1 month of approval.</p> <p>Monitoring:</p> <p>Monitor via a Management Plan and Program review schedule to ensure appropriate timing of public availability provision. Implementation of monitoring program.</p>	Compliant	<p>The CHMP PCF 6 was approved by EPA CEO on the 22 June 2022 and the Plan was published on the Perdaman's website. CHMP PCF6 remained in place on Perdaman's website until PCF8 was published on Perdaman's website.</p> <p>The PCF 8 was revised and submitted to the Minister on the 22 March 2024 and was published on the 27 March 2024. Plan was published within 1 month of submission. The revised plan did not require approval under the W.A. Approval.</p>
<p>Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6</p> <p>Section 7 Table 7-1 Objective Based Management Actions & Targets.</p>		<p>MANAGEMENT ACTION 15</p> <p>Install fencing around the perimeter of the Project Area prior to construction.</p> <p>Perdaman notes the high-risk rating assigned to Recreation, tourism and vandalism by the AHC (AHC, 2012). As indicated by MAC during liaison, there is a desire to avoid prominent identification and demarcation of individual heritage sites, including installation of fencing, that may attract attention and exacerbate the identified risk associated with recreation, tourism and vandalism. Physical</p>	<p>CHM TARGET 15</p> <p>Chain mesh and wire fence 2.2m in height installed around the perimeter of the Project Area before construction commences.</p> <p>Monitoring:</p> <p>Weekly environmental inspections of the fencing at The Project boundary.</p> <p>Incident Reporting System.</p> <p>Environmental Audits.</p>	<p>Compliant with the MA 15</p> <p>Non-Compliant with CHM Target 15</p>	<p>Temporary fencing has been installed around the perimeter of the Project area and remains in place during the reporting period.</p> <p>Due to safety issues and proximity of fencing to sensitive heritage sites, three strand wire with star pickets was installed as a temporary fencing measure around the Project Area. This methodology allowed the fencing sub-contractor to install the fencing from the inside of the Project Area to address safety and heritage concerns. As such no chain mesh and wire fencing of 2.2 m in height, has not been installed.</p> <p>As per the June 2024 (environmental)</p>

Document Reference	Management Objective	Key Management Action / Commitment	Management Target /	Status	Evidence / Justification / Comments
PCF 8		barriers to protect sites pursuant to the provisions of the GDP will be agreed with MAC with the objective of managing any temporary risk arising from The Project being balanced with attracting attention that could increase the likelihood of these other risks.			site audit, weekly environmental inspections were sighted, which include fencing checks and maintenance if required. The Incident Reporting System (InX) was also sighted at the time of the audit, whereby no fencing incidents were observed within the system.
Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6 Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8		MANAGEMENT ACTION 16 Signs are installed. The signs will state that no construction and operation staff are permitted to enter areas surrounding the Project Area that contain manmade structures of a type mentioned in the NHP Gazette notice (Attachment B) and/or engravings and/or standing stones and/or archaeological material associated with any of the aforementioned items. If their work specifically requires them to do so, they must obtain a GDP for the proposed work. Ensure all heritage places outside the NHP that do not have current s.18 Ministerial Approval are protected in accordance with this plan.	CHM TARGET 16 Signage will be at least 1m ² in size and attached to fencing at the entrance to the Project Area at no less than 50m intervals along the fence prior to construction commencing. Monitoring: Weekly environmental inspections at The Project boundary. Incident Reporting System. Environmental Audits. Review of identified heritage sites and associated management strategies. Heritage Access Register.	Compliant with Management Action 16 Non-Compliant with Management Target 16	The Project implements a Ground Disturbance procedure and permit system. Cultural Heritage sites are protected in accordance with this plan. Fencing and locations are communicated to personnel during inductions. Signage on the fence states "No-Go-Zone Heritage Protection Area KEEP OUT". The signs did not meet the Management Target requirements of being at least 1 m ² in size.
centrSection 2 Table 2-1 Objective Based		MANAGEMENT ACTION 17 Immediately cease carrying out the Purpose if human skeletal remains ("Remains") are found and report the matter to the	CHM TARGET 17 The WA Police will be informed of any discovery of human remains. If the Police suspect the remains	Compliant	MAC Rangers / representatives have been present during clearing activities to identify additional items of heritage value (i.e. artifacts, scatter, engraving, grinding patches).

Document Reference	Management Objective	Key Management Action /Commitment	Management Target / Monitoring	Status	Evidence / Justification / Comments
<p>Management Actions & Targets.</p> <p>PCF6</p> <p>Section 7</p> <p>Table 7-1</p> <p>Objective Based Management Actions & Targets.</p> <p>PCF 8</p>		<p>Western Australian Police and the Registrar. Advice from the Western Australian Police and Registrar will then be followed regarding management of the issue.</p> <p>MAC Rangers / representatives present during clearing activities to identify additional items of heritage value (i.e. artifacts, scatter, engraving, grinding patches)</p>	<p>to be of Aboriginal origin, the Registrar and MAC will also be informed.</p> <p>Contractor to temporarily cease work in the vicinity of the area of concern and address the unexpected find through consultation with MAC).</p> <p>Monitoring:</p> <p>Monitoring for unexpected heritage finds during GDA's.</p> <p>Unexpected Finds reported and managed in consultation with MAC representative.</p> <p>Reporting:</p> <p>Reporting as per advice of the Western Australian Police and the Registrar.</p> <p>Internal incident reporting (not considered an 'incident' under the EPBC approval. No reporting required under MS 1180, or s.18 AHA consent)</p> <p>Only if human remains are suspected by the Police / Coroner's office to be Aboriginal, the Registrar as well as the Federal Minister for Aboriginal Affairs and MAC are to be informed.</p>		<p>There have been no unexpected heritage finds and no human skeletal remains found during the reporting period.</p> <p>No notifications were required to be provided to the WA Police during the reporting period.</p>

Document Reference	Management Objective	Key Management Action /Commitment	Management Target /	Status	Evidence / Justification / Comments
<p>Section 2</p> <p>Table 2-1</p> <p>Objective Based Management Actions & Targets.</p> <p>PCF6</p> <p>Section 7</p> <p>Table 7-1</p> <p>Objective Based Management Actions & Targets.</p> <p>PCF 8</p>		<p>MANAGEMENT ACTION 18</p> <p>To protect national heritage values within the Dampier Archipelago NHP:</p> <p>1. At least 6 months prior to Ground Disturbing Activities, Perdaman shall, in consultation with MAC and the DPLH, revise and submit to the CEO of the EPA 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) in accordance with Condition 9-2 of MS 1180.</p> <p>2. Perdaman shall provide a complete copy of the revised Management Plan as required by Condition 9-2 of MS 1180, to the Department of Climate Change, Energy, the Environment and Water, within 10 business days of the approval of the revised version by the CEO of the EPA, in accordance with Condition 5 of the EPBC approval.</p>	<p>CHM TARGET 18</p> <p>If update required, CHMP submitted to the Federal Minister that has responsibility for the EPBC Act and approved prior to the Action commencing. Ensure all heritage places outside the NHP that do not have current s.18 Ministerial Approval are protected in accordance with this plan.</p> <p>Monitoring:</p> <p>Monitoring of management provision effectiveness prior to CHMP review. Monitoring of all heritage places within and adjacent the UPDE.</p> <p>Reporting:</p> <p>Provide the revised version of the CHMP to the CEO of the EPA in accordance with Condition 9-2 of MS 1180, and to the Department of Climate Change, Energy, the Environment and Water in accordance with Condition</p>	Compliant	<p>CHMP Version (PCF 2, 26 March, 2021) was revised in consultation with MAC and the DPLH and submitted to the CEO of the EPA and the Registrar of Aboriginal Sites and approved as the confirmed CHMP (PCF6) on the 22 June 2022 by the EPA CEO. GDA commenced on the 11 July 2023. The Plan was submitted 11 months prior to GDA commencing.</p> <p>A copy was provided to the DCCEEW on the same date in which it was provided to EPA (prior to the approval from the EPA). EPA approved the CHMP PCF6 on the 22 June 2022. Further to this a copy was provided again via email 2 February, 2023, to ensure compliance with condition 5(a) of the Approval.</p> <p>The email correspondence between the Approval Holder delegate and DCCEEW is provided in Appendix A of this ACR (PUP_ACR2024-007).</p> <p>During the reporting Period, the CHMP (version PCF6) required an update. On 9 February 2024 Perdaman notified the DCCEEW and DWER (PUP_ACR2024-014) that the CHMP (rev 6) was revised in accordance with MS 1180 condition 9-8 (1) and (2) based on identifying a required change to Management Action 21 within the CHMP (PCF6) in order to prevent a</p>

Document Reference	Management Objective	Key Management Action /Commitment	Management Target /	Status	Evidence / Justification / Comments
					non-achievement.
<p>Section 2</p> <p>Table 2-1 Objective Based Management Actions & Targets.</p> <p>PCF6</p> <p>Section 7</p> <p>Table 7-1 Objective Based Management Actions & Targets.</p> <p>PCF 8</p>		<p>MANAGEMENT ACTION 19</p> <p>Support the efforts and aspirations of MAC to achieve World Heritage Listing of Murujuga</p>	<p>CHM TARGET 19</p> <p>Support for this purpose is identified in the November 2019 Commercial Agreement between Perdaman and MAC is provided to the agreed (confidential) requirements.</p> <p>Monitoring:</p> <p>Monitoring through environmental performance reports.</p> <p>Environmental audits.</p>	Compliant	<p>Perdaman have provided support to MAC to achieve World Heritage Listing of Murujuga is ongoing during the reporting period.</p> <p>Support has included financial contributions to assist MAC delegates to attend ICOMOS conventions and the provision of written summaries of heritage management processes, procedures and performance for communication with the World Heritage assessment committee.</p>
<p>Section 2</p> <p>Table 2-1 Objective Based Management Actions & Targets.</p> <p>PCF6</p> <p>Section 7</p> <p>Table 7-1 Objective Based Management Actions &</p>		<p>MANAGEMENT ACTION 20</p> <p>Engage as a contributing participant in the MRAS, which provides the framework for monitoring, analysing and responding to changes in rock art. It is recognized that this data will play an important role in informing the World Heritage nomination process.</p>	<p>CHM TARGET 20</p> <p>Participation in the MRAS, including the EQMF and implementing agreed responses to exceedances of the environmental quality criteria (guidelines and standards) to be developed pursuant to the MRAS where the cause is reasonably identified as industrial emissions of the type emitted by Perdaman.</p> <p>Monitoring:</p> <p>Analysis of Murujuga Rock</p>	Compliant	<p>The Approval Holder is a member of the MRAMP SRG and attends each quarterly MRAMP SRG meeting to participate in the updates on the MRAMP and has provided comment on the first-year monitoring report.</p> <p>CHM TARGET 20 has not been applicable during the reporting period.</p>

Document Reference	Management Objective	Key Management /Commitment	Action	Management Target / Monitoring	Status	Evidence / Comments	Justification /
Targets. PCF 8				<p>Art monitoring results. Monitoring of Project emissions as per the Confirmed Air Quality and Management Plan.</p> <p>Reporting:</p> <p>Reporting, if required by the MRAS</p>			
Section 2 Table 2-1 Objective Based Management Actions & Targets.		<p>MANAGEMENT ACTION 21</p> <p>The GDP is to include the following provisions and detailed procedures for the protection of heritage sites:</p> <ul style="list-style-type: none"> •Details for a pre-ground disturbance inspection of the required boundary demarcations. •Undertake ground disturbing works in consultation with MAC, Circle of Elders and Traditional Custodians, and facilitate the observation of those activities by those persons. •Two MAC representatives from each of the following groups are to be invited by notice in writing within 30 days of GDAs; Ngarluma, Yinjibarndi, Mardudhunera, Wong-Goo-Tt-Oo and Yaburara. •Where a Project lease from Development WA (Lease) overlies or abuts the NHP, a 5 m buffer (No-go zone) must be established around the NHP heritage site location (as 		<p>CHM TARGET 21</p> <p>GDP includes provisions to ensure no impact to heritage sites in the NHP occurs, and compliance with provisions (and approval conditions) is demonstrated in GDP procedures.</p> <p>Monitoring:</p> <p>Daily visual inspections of heritage sites (MAC heritage monitors and rangers) during ground disturbance.</p> <p>Ad hoc inspections of heritage sites (MAC heritage monitors and rangers) during Project construction.</p> <p>Weekly inspections of the boundary demarcation.</p> <p>MAC to monitor all GDA's (including blasting).</p> <p>Monitoring for unexpected</p>	Compliant	<p>GDP's include provisions in accordance with Target 21.</p> <p>During the period from 11 July 2023 to 7 February 2024, the GDP included the provisions within Management Action 21.</p> <p>On 9 February 2024, the Approval Holder provided the EPA and DCCEEW with notification that the Confirmed CHMP (PCF6) required amendment to this Management Action, and specifically the requirement for the use of blast mats to prevent flying rock.</p> <p>On the 22 March 2024 the Approval Holder provided the EPA and DCCEEW with the updated CHMP (PCF 8) and notified them that the CHMP (PCF8) had been in effect since 8 February 2024.</p>	

Document Reference	Management Objective	Key Management Action /Commitment	Management Target / Monitoring	Status	Evidence / Justification / Comments
		<p>recorded in the IHS Heritage Report, Table 5) that is located within 50m of the ground disturbing activity throughout the construction phase.</p> <ul style="list-style-type: none"> •Where ground disturbance, including clearing activities, are conducted either within the NHP or within 50m where the Lease abuts the NHP, post clearing (and blasting) surveys must be undertaken to confirm no disturbance occurred to any heritage sites within the NHP. •Where the Lease overlies or abuts the NHP, clearing boundaries in proximity (<50m separation) to heritage sites within the NHP must be demarcated and hard barricaded (bunting) prior to any disturbance. •Where a Lease overlies or abuts the NHP, MAC rangers must be provided the opportunity to be present prior to and during any ground disturbance and present during any clearing operations (including blasting) conducted either within the NHP or where NHP heritage sites that is located within 50m of the ground disturbing activity. • where ground disturbance, including clearing activities are conducted either within the NHP or within 50m where the Lease 	<p>heritage finds during GDA's.</p> <p>Track GDP procedures against provisions during ground disturbing works.</p> <p>Monitoring of sites post disturbance.</p> <p>Monitoring of dust generation by ground disturbing activities.</p>		

Document Reference	Management Objective	Key Management Action /Commitment	Management Target /	Status	Evidence / Justification / Comments
		<p>abuts the NHP, ground preparation works in proximity to the NHP must be managed using water carts (to decrease dust) and blast mats (to prevent flying rock).</p> <ul style="list-style-type: none"> •If blasting is required, low percussion explosives will be utilised by a licensed shotfirer to minimise fly rock and ground vibration. •If the MAC ranger considers that the work is being conducted in a manner that creates a potential risk to a NHP site, the ground disturbing activity must stop, and the ranger must advise the MAC CEO of this potential risk.5 •The GDP must include a provision whereby the ‘stop work notification” for the immediate area initiates a risk review and task redesign to achieve an ALARP outcome before the ground disturbing activity can be restarted. •The GDP required review must be conducted by the Liaison Committee in accordance with Liaison Committee’s operational requirements and approved by the Minister having responsibility for the EPBC Act. 			
Section 7 Table 7-1		<p>MANAGEMENT ACTION 21</p> <p>The GDP is to include the following provisions and detailed</p>	<p>CHM TARGET 21</p> <p>GDP includes provisions to ensure no impact to</p>	Compliant	The Project was compliant with this MA 21 and Target 21 within the CHMP PCF8 during the period between 8

Document Reference	Management Objective	Key Management Action /Commitment	Management Target / Monitoring	Status	Evidence / Justification / Comments
Objective Based Management Actions & Targets. PCF 8		<p>procedures for the protection of heritage sites:</p> <p>Details for a pre-ground disturbance inspection of the required boundary demarcations.</p> <p>Undertake ground disturbing works in consultation with MAC, Circle of Elders and Traditional Custodians, and facilitate the observation of those activities by those persons.</p> <p>Two MAC representatives from each of the following groups are to be invited by notice in writing within 30 days of GDAs; Ngarluma, Yinjibarndi, Mardudhunera, Wong-Goo-Tt-Oo and Yaburara.</p> <p>Where a Project lease from Development WA (Lease) overlies or abuts the NHP, a 5 m buffer (No-go zone) must be established around the NHP heritage site location (as recorded in the IHS Heritage Report, Table 5) that is located within 50m of the ground disturbing activity throughout the construction phase.</p> <p>Where ground disturbance, including clearing activities, are conducted either within the NHP or within 50m where the Lease abuts the NHP, post clearing (and blasting) surveys must be undertaken to confirm no disturbance occurred to any</p>	<p>heritage sites in the NHP occurs, and compliance with provisions (and approval conditions) is demonstrated in GDP procedures.</p> <p>Monitoring:</p> <p>Daily visual inspections of heritage sites (MAC heritage monitors and rangers) during ground disturbance.</p> <p>Ad hoc inspections of heritage sites (MAC heritage monitors and rangers) during Project construction.</p> <p>Weekly inspections of the boundary demarcation.</p> <p>MAC to monitor all GDA's (including blasting).</p> <p>Monitoring for unexpected heritage finds during GDA's.</p> <p>Track GDP procedures against provisions during ground disturbing works.</p> <p>Monitoring of sites post disturbance.</p> <p>Monitoring of dust generation by ground disturbing activities.</p>		<p>February 2024 to 10 July 2024.</p> <p>The management action was amended to include the provisions for '<i>approximately 1 meter of overburden (to prevent flying rock)</i>' to be utilised rather than blast mats.</p>

Document Reference	Management Objective	Key Management Action /Commitment	Management Target /	Status	Evidence / Justification / Comments
		<p>heritage sites within the NHP.</p> <p>Where the Lease overlies or abuts the NHP, clearing boundaries in proximity (<50m separation) to heritage sites within the NHP must be demarcated and hard barricaded (bunting) prior to any disturbance.</p> <p>Where a Lease overlies or abuts the NHP, MAC rangers must be provided the opportunity to be present prior to and during any ground disturbance and present during any clearing operations (including blasting) conducted either within the NHP or where NHP heritage sites that is located within 50m of the ground disturbing activity.</p> <p>where ground disturbance, including clearing activities are conducted either within the NHP or within 50m where the Lease abuts the NHP, ground preparation works in proximity to the NHP must be managed using water carts (to decrease dust) and approximately 1 meter of overburden (to prevent flying rock).</p> <p>If blasting is required, low percussion explosives will be utilised by a licensed shotfirer to minimise fly rock and ground vibration.</p> <p>If the MAC ranger considers that</p>			

Document Reference	Management Objective	Key Management Action /Commitment	Management Target /	Status	Evidence / Justification / Comments
		<p>the work is being conducted in a manner that creates a potential risk to a NHP site, the ground disturbing activity must stop, and the ranger must advise the MAC CEO of this potential risk.⁵</p> <p>The GDP must include a provision whereby the 'stop work notification" for the immediate area initiates a risk review and task redesign to achieve an ALARP outcome before the ground disturbing activity can be restarted.</p> <p>The GDP required review must be conducted by the Liaison Committee in accordance with Liaison Committee's operational requirements and approved by the Minister having responsibility for the EPBC Act.</p> <p>5 Note: This is comparable to a safety stop work authority that when exercised, invokes a risk review process intended to redesign the task methodology so that it can be restarted in a manner that addresses the risk to ALARP.</p>			
Section 2 Table 2-1 Objective Based Management Actions &		<p>MANAGEMENT ACTION 22</p> <p>Rock Art Condition Monitoring If the MRAS rock art and emissions monitoring program is not initiated and/or Perdaman is not a contribution participant to the</p>	<p>CHM TARGET 22</p> <p>Approval of the alternative monitoring program by the Minister having responsibility for the EPBC Act. Implementation of the</p>	Not Applicable	This Management Action was not applicable during the reporting period.

Document Reference	Management Objective	Key Management Action /Commitment	Management Target /	Status	Evidence / Justification / Comments
<p>Targets. PCF6 Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8</p>		<p>MRAS before commencement of the Action, Perdaman will submit to DCCEEW an alternative monitoring program based on EPBC 2008/4546 Condition 10 (c) as amended on 18 December 2013. This Monitoring Program must:</p> <ul style="list-style-type: none"> • implement the same techniques approved by MAC for these purposes and by the Minister having responsibility for the EPBC Act pursuant to EPBC 2008/4546, • be conducted by accredited technical professionals also approved by the Minister having responsibility for the EPBC Act, • be conducted at the same frequency (at least once annually), and • Engage with MAC in the same manner as required by Condition 10 (c) vi of EPBC 2008/4546. • Implement MRAS rock art monitoring from a period of no less than five (5) years from the beginning of construction, or until twelve (12) months after the WA State Government MRAS monitoring program is initiated, whichever is reached first. 	<p>approved monitoring program. Results must be reported in annual environmental report and provided to MAC and the MRAS Reference Group at that time.</p> <p>Monitoring: Consultation with MAC concerning MRAS monitoring program initiation (to determine potential requirement to develop an alternative monitoring program). Monitoring of rock art by allocated technical professional/s. Monitoring of procedures implemented (by the Monitoring Program) to ensure monitoring occurs in alignment with MAC MRAS requirements.</p> <p>Reporting: Submit to DCCEEW an alternative monitoring program based on EPBC 2008/4546 Condition 10 (c) as amended on 18 December 2013.</p>		
<p>Section 2 Table 2-1 Objective</p>		<p>MANAGEMENT ACTION 23 Project development activities that impact on National Heritage</p>	<p>CHM TARGET 23 Impacts to National Heritage Values of the NHP</p>	Compliant	There have been no impacts to NHP within the PDE or adjacent to the PDE, during the reporting period.

Document Reference	Management Objective	Key Management Action /Commitment	Target / Monitoring	Status	Evidence / Justification / Comments
<p>Based Management Actions & Targets.</p> <p>PCF6</p> <p>Section 7</p> <p>Table 7-1</p> <p>Objective Based Management Actions & Targets.</p> <p>PCF 8</p>		<p>Values of the NHP, to be reported in accordance with the statutory requirements of the regulatory authorities.</p> <p>These may include (but not limited to) impacts caused by: Blasting activity; construction and operations and spillage of potentially corrosive materials.</p>	<p>to be reported in accordance with the statutory requirements of the regulatory authorities.</p> <p>Monitoring:</p> <p>Monitoring of incident reports.</p> <p>Track GDP procedures against provisions during ground disturbing works.</p> <p>All GDA's to be monitored by delegated MAC representative.</p> <p>Reporting:</p> <p>Reporting of the non-achievement of a management target specified in the CHMP to the CEO of the EPA, MAC, the DPLH and the Registrar of Aboriginal Sites in accordance with Condition 9-5 of MS 1180.</p> <p>Reporting to DCCEEW of any incident (any event which has the potential to, or does, impact on one or more protected matter(s) other than as authorised by the EPBC approval) in accordance with Condition 18 of the EPBC approval.</p> <p>Submission of a revised version of the CHMP that addresses the findings of</p>		<p>A site audit conducted in June 2024 did not observe any incident reports relating to the national heritage values of the NHP, within the incident register system, INX.</p>

Document Reference	Management Objective	Key Management Action / Commitment	Management Target / Monitoring	Status	Evidence / Justification / Comments
			any report provided under Conditions 9-5 and 9-6 of MS 1180, for approval by the Minister.		
<p>Section 2</p> <p>Table 2-1 Objective Based Management Actions & Targets.</p> <p>PCF6</p> <p>Section 7</p> <p>Table 7-1 Objective Based Management Actions & Targets.</p> <p>PCF 8</p>		<p>MANAGEMENT ACTION 24</p> <p>Characterise existing (baseline) air quality and local and regional meteorology within the Murujuga airshed, drawing on the findings of relevant studies and publicly available monitoring datasets.</p> <p>This would be undertaken either separately by Perdaman, or collaboratively with other industry data custodians. Identify the key sensitive receptors in terms of potential health and amenity impacts and heritage values within the Murujuga airshed.</p>	<p>CHM TARGET 24</p> <p>Collate an appropriate baseline dataset of local meteorological conditions and existing air quality conditions prior to Project operations. Support the MRAS.</p> <p>Details of existing baseline data will be determined to assist with monitoring and management targets implemented to conserve sensitive receptors surrounding The Project area.</p> <p>The details / results of such will be included as provisions in the Confirmed Air Quality Management Plan.</p> <p>Monitoring:</p> <p>Monitoring of emissions associated with The Project works and operations as per the Confirmed Air Quality Management Plan.</p> <p>Monitoring of regional airshed and meteorological conditions.</p> <p>Monitoring the condition of</p>	Compliant	<p>Perdaman engaged GHD to commence baseline air quality assessments in 2022. GHD undertook air quality monitoring in February and March of 2022 to assess baseline conditions of pollutants including ammonia, nitrogen dioxide, sulphur dioxide and dust deposition. The study used three monitors with monitors 2 and 3 placed near rock art to understand baseline emissions close to sensitive areas.</p> <p>The details of which will be included in the revised Air Quality Management Plan. Baseline information has also been provided within DWER supporting information for works approvals and licence applications to date.</p> <p>The Air Quality Management Plan is not a confirmed plan during the reporting period. Submission is not required until at least 6 months prior to operations.</p>

Document Reference	Management Objective	Key Management /Commitment	Action	Management Target / Monitoring	Status	Evidence / Comments	Justification /
				<p>sensitive receptors in relation to particle deposition and potentially toxic/irritable air constituents.</p> <p>Monitoring of rock art by allocated technical professional/s.</p> <p>Monitoring of procedures implemented (by the Monitoring Program) to ensure monitoring occurs in alignment with MAC MRAS requirements.</p> <p>Reporting:</p> <p>Reporting as per the Confirmed Air Quality Management Plan.</p> <p>Reporting in alignment with the requirements of the MRAS (or alternative monitoring program) reporting.</p>			
<p>Section 2</p> <p>Table 2-1</p> <p>Objective Based Management Actions & Targets.</p> <p>PCF6</p> <p>Section 7</p> <p>Table 7-1</p>		<p>MANAGEMENT ACTION 25</p> <p>Evaluate the potential incremental impact of air emissions from The Project on key receptors in the vicinity of the site.</p> <p>Undertake air dispersion modelling. To predict the potential ambient air quality impacts of Project Ceres. This will include scenarios considering the emissions from Project Ceres</p>		<p>CHM TARGET 25</p> <p>Collaborate with other operating entities in the Burrup Industrial Area to categorise and determine emission estimates from Project Ceres (and surrounding projects), to inform cumulative emission constituents regarding surrounding industry operations.</p>	Not Applicable	<p>This MA and Target has not been required to commence during the reporting period.</p>	

Document Reference	Management Objective	Key Management Action /Commitment	Management Target / Monitoring	Status	Evidence / Comments	Justification /
Objective Based Management Actions & Targets. PCF 8		<p>(in isolation), the increased emissions that would be generated during start-up, upset conditions, and shutdown; and the incremental cumulative impact of Project Ceres considering other industry currently operating (or approved to operate but yet to be built) and proposed future industrial facilities such as Coogee Chemicals Pty Ltd Downstream Processing Chemical Production Facility³ in Project Ceres area. Emissions from existing and proposed future shipping activities will also be included in the cumulative air quality modelling scenarios⁴. Contour plots and tables listing the modelled ambient ground level concentrations for the air pollutants of concern for the relevant modelling scenarios will be included.</p> <p>Evaluate the potential incremental risk of impact upon rock art by assessing predicted pollutant deposition rates at key sensitive receptors. This assessment will be done within the context of the Murujuga Rock Art Strategy (released on 15 February 2019), which provides a monitoring, analysis and decision-making framework to protect Aboriginal rock art located on the Dampier Archipelago and Burrup Peninsula.</p>	<p>Use emission estimates and modelling of collated data to assist in informing monitoring and management strategies for the MRAS.</p> <p>Support the MRAS through monitoring of pollutant deposition on local rock art.</p> <p>3In relation to proposed future industrial facilities it is noted that as these facilities are only proposals and not yet approved, relevant primary emissions data may not be accessible in the public domain. While best endeavours will be used to access relevant primary data, where this cannot be sourced the modelling will include generic surrogate information for a comparable plant and sited in the proposed development location.</p> <p><i>In relation to emissions from shipping it is noted that primary data recording emissions from actual individual or aggregate shipping movements in the Port of Dampier is not available. Therefore, an appropriate surrogate dataset as agreed with the Air Quality Branch and WA</i></p>			

Document Reference	Management Objective	Key Management /Commitment	Action	Management Target /	Status	Evidence /	Justification /
				<p><i>EPA will be incorporated in the model to account for this source of emissions into the Murujuga airshed.</i></p> <p>Monitoring:</p> <p>Monitoring of pollutant deposition on rock art and surrounding sensitive receptors.</p> <p>Monitoring baseline air quality conditions of the Murujuga airshed (including meteorological conditions) prior to commencement of operations.</p> <p>Monitoring of air emissions during Project operations.</p> <p>Monitoring of cumulative air emissions and communicating results to appropriate stakeholders of the Burrup Industrial Area.</p> <p>Reporting:</p> <p>Reporting as per the Confirmed Air Quality Management Plan.</p> <p>Reporting in alignment with the requirements of the MRAS (or alternative monitoring program) reporting.</p>			

Document Reference	Management Objective	Key Management Action / Commitment	Management Target / Monitoring	Status	Evidence / Justification / Comments
<p>Section 2</p> <p>Table 2-1 Objective Based Management Actions & Targets.</p> <p>PCF6</p> <p>Section 7</p> <p>Table 7-1 Objective Based Management Actions & Targets.</p> <p>PCF 8</p>		<p>MANAGEMENT ACTION 26</p> <p>Audit performance against this plan.</p>	<p>CHM TARGET 26</p> <p>Audit at intervals no greater than 12 months apart.</p> <p>Include Audit results in Project Ceres Annual Report.</p> <p>Monitoring:</p> <p>Weekly monitoring.</p> <p>Quarterly Project Audit results.</p>	Compliant	<p>The CHMP is reviewed at least annually. During the reporting period it was reviewed and amended in July 2023.</p> <p>To carry out this implementation summary in July/August 2024 an audit of the CHMP performance was carried out. It is anticipated that audits will be conducted no more than 12 months apart.</p> <p>The first ACR is due 3 October 2024. This implementation summary is included within the ACR.</p>
<p>Section 2</p> <p>Table 2-1 Objective Based Management Actions & Targets.</p> <p>PCF6</p> <p>Section 7</p> <p>Table 7-1 Objective Based Management Actions & Targets.</p>		<p>MANAGEMENT ACTION 27</p> <p>Provide for relevant traditional owners to observe the activities (as reasonably required) related to operational activities that cause noise, traffic changes and impacts to visual amenity.</p>	<p>CHM TARGET 27</p> <p>100% compliance with Condition 9-2 (4) of MS 1180.</p> <p>Monitoring:</p> <p>Non-compliance registers.</p> <p>Complaints registers.</p> <p>Consultation.</p> <p>Incident management system.</p>	Not Applicable	Operational activities have not commenced during the reporting period.

Document Reference	Management Objective	Key Management Action /Commitment	Management Target / Monitoring	Status	Evidence / Justification / Comments
PCF 8					
Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6 Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8		<p>MANAGEMENT ACTION 28</p> <p>Following the decommissioning of Project Ceres, access for Traditional Owner and Custodians to the sites as shown in Figure 4-1 must be maintained.</p>	<p>CHM TARGET 28</p> <p>Ensure access is not limited, altered or restricted to those sites shown in Figure 4-1 upon decommissioning of Project Ceres.</p> <p>Monitoring:</p> <p>Non-compliance registers. Complaints registers. Consultation. Incident management system.</p> <p>Reporting:</p> <p>Reporting to the Registrar of Aboriginal Sites in accordance with Condition 4 of s.18 AHA consent. Reporting in accordance with the Decommissioning and Rehabilitation Plan in accordance with Condition 13 of MS 1180.</p>	Not Applicable	Project decommissioning has not commenced during the reporting period.
Section 2 Table 2-1 Objective Based Management Actions & Targets.		<p>MANAGEMENT ACTION 29</p> <p>Identify and justify all reasonable and practicable emission reduction equipment and proposed technologies and demonstrate the use of industry best practice pollution control technology and plant processes</p>	<p>CHM TARGET 29</p> <p>Continual revision of current technology use and seek for opportunities to implement best practice pollution control technology throughout the life of</p>	Not Applicable	The Project Plant has not been constructed yet. The revised AQMP will identify all reasonable and practicable emission reduction equipment and proposed technologies. The plan will be submitted to the Regulators at least 6 months prior to operations in accordance with

Document Reference	Management Objective	Key Management Action /Commitment	Management Target /	Status	Evidence / Justification / Comments
PCF6 Section 7 Table 7-1 Objective Based Management Actions & Targets. PCF 8		including benchmarking against world's best practice for urea production plants.	Project Ceres. Emissions benchmarking and continual improvements will be addressed in detail in the Confirmed Air Quality Management Plan. Monitoring: Monitoring of best industry practice technology as it becomes available. Monitoring of emission target achievement. Reporting: Emission reduction equipment and technologies are approved through the EP Act Part V licence for the operation of Project Ceres.		condition 9-2 of the MS1180.
Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6 Section 7 Table 7-1 Objective Based		MANAGEMENT ACTION 30 At completion of Project Ceres Purpose, a final report detailing the extent of impacts to aboriginal sites will include: • what extent the Purpose has impacted any Aboriginal site on the Land; • where any Aboriginal site has been impacted, whether such site has been partially or wholly impacted by the Purpose, and the level, effect and type of any such	CHM TARGET 30 Provides a written report to the Registrar of Aboriginal Sites within 60 days of the completion of the Purpose, advising whether and to what extent the Purpose has impacted on all or any sites located on the Land. Monitoring: Monitoring of all site disturbance (salvage and relocation) and any other	Not Applicable	The Project's purpose has not been completed during the reporting period.

Document Reference	Management Objective	Key Management Action /Commitment	Management Target /	Status	Evidence / Justification / Comments
Management Actions & Targets. PCF 8		<p>impact – preferably by the provision of photographs taken before and after the impact;</p> <ul style="list-style-type: none"> where any Aboriginal site has been subject to archaeological or cultural salvage, when and how such salvage took place, who was present at the salvage and where the material was re-located, the results of the salvage and any subsequent analysis conducted; <p>the results and findings of any monitoring of ground disturbing works associated with the Purpose; and</p> <ul style="list-style-type: none"> what extent the site has been remediated. 	<p>impacts to aboriginal heritage sites.</p> <p>Monitoring remediation efforts. Salvage reports.</p> <p>Annual written report.</p> <p>Reporting:</p> <p>Reporting to the Registrar of Aboriginal Sites in accordance with Condition 4 of s.18 AHA consent.</p> <p>Reporting in accordance with the Decommissioning and Rehabilitation Plan in accordance with Condition 13 of MS 1180.</p>		
Section 2 Table 2-1 Objective Based Management Actions & Targets. PCF6 Section 7 Table 7-1 Objective Based Management Actions & Targets.		<p>MANAGEMENT ACTION 31</p> <p>Heritage areas, including Project Ceres's construction limits, shall be demarcated with survey markers prior to installing temporary fencing before clearing works. The following measures relating to temporary fencing and early warning survey markers for heritage site boundaries will be implemented:</p> <ul style="list-style-type: none"> Temporary fencing location will be initially surveyed and identified using pink and black flagging (specific flag colours for heritage site boundaries). Temporary fencing will be 	<p>CHM TARGET 31</p> <p>Avoid direct impacts to heritage areas during ground disturbing works by ensuring a suitably qualified surveyor sets out the construction battery limits for the erection of temporary fencing prior to construction.</p> <p>Monitoring:</p> <p>Survey markers to be inspected daily by site supervisors and weekly by the PER.</p> <p>Inspections to confirm presence of all early</p>	Compliant	<p>A suitably qualified surveyor set the construction battery limits. Fencing has been erected where practicable in accordance with the Ground Disturbance Procedure which includes the requirements of Management Action 31.</p> <p>Construction limits are demarcated with flagging and fencing in accordance with this MA and target. This was confirmed by the June 2024 internal site audit.</p>

Document Reference	Management Objective	Key Management Action /Commitment	Management Target / Monitoring	Status	Evidence / Comments	Justification /
PCF 8		<p>installed along the pink and black-flagged boundary and consist of star pickets driven into the ground marking the edge of the boundary. Where possible, pink and black flagging shall remain.</p> <ul style="list-style-type: none"> • Yellow safety caps will be placed on the top of the star pickets. • Two strands of non-barbed wire will connect the star pickets to present a visual barrier. • Star pickets should be installed 5m apart. • Star pickets must be installed at each directional change. • An early warning survey marker (denoted by white flagging) will be installed a minimum of 0.5m from the clearing boundary (location of temporary fence) (See FMP). • Survey markers to be set out by a qualified surveyor, including a 5m buffer (pink and black flagging) and 3m early warning marker (white flagging) from the perimeter of the heritage area temporary fencing. • The correct location of temporary fencing and survey markers is to be confirmed onsite by a suitably qualified surveyor and data provided to PER. 	<p>warning survey markers denoted by white flagging, pink and black 5m buffer markers and pink and black heritage markers).</p> <p>Temporary fences are to be checked on a weekly basis as part of routine site inspections to ensure they remain in place and effective during construction.</p> <p>All survey markers and temporary fencing shall be maintained throughout construction and commissioning or until replaced by permanent fencing.</p> <p>The correct location of boundary markers is to be checked and confirmed onsite by a suitably qualified surveyor prior to commencement of GDAs.</p> <p>Any identified damage to temporary fences is to be repaired immediately upon discovery.</p> <p>GPS Mapping on surveyed boundaries to check clearing progress daily.</p> <p>Quarterly inspections during operations.</p> <p>Reporting:</p>			

Document Reference	Management Objective	Key Management Action /Commitment	Management Target / Monitoring	Status	Evidence / Justification / Comments
		<ul style="list-style-type: none"> The requirement for temporary fencing and survey markers shall be included in the Ground Disturbance Permit (GDP) issued for those particular works, with onsite verification by the Contractor's Environmental Representative prior to the commencement of clearing Works. 	<p>Incident reporting for clearing inconsistent with the GDP, and damage to fencing.</p> <p>Reporting of the non-achievement of a management target specified in the CHMP to the CEO of the EPA, MAC, the DPLH and the Registrar of Aboriginal Sites in accordance with Condition 9-5 of MS 1180.</p> <p>Reporting to DCCEEW of any incident (any event which has the potential to, or does, impact on one or more protected matter(s) other than as authorised by the EPBC approval) in accordance with Condition 18 of the EPBC approval.</p> <p>Submission of a revised version of the CHMP that addresses the findings of any report provided under Conditions 9-5 and 9-6 of MS 1180, for approval by the Minister.</p>		

5.3 Implementation Summary – Air Quality Management Plan (Final Version PCF 2, 25 March 2021)

Implementation of the AQMP (PCF2) was not required during the Reporting Period.

5.4 Implementation Summary – Impact Reconciliation Procedure (PCF-PD-EN-IRP_Rev 1, 21 March 2022) (SCJV, 2022)

The IRP Rev 1 was implemented between 11 July 2023 (Commencement of Action) through to 10 July 2024.

Table 6 Implementation Summary Impact Reconciliation Procedure

Document Reference	Commitment of the procedure	Status	Evidence / Justification / Comments
Section 2.2 Approved Clearing Baseline	Surveying and ground truthing of the clearing progress will be undertaken annually.	Compliant	The Project undertakes regular surveying and GIS based assessment of clearing undertaken against the clearing limits allowable. Clearing data is updated to the online geospatial system as clearing is undertaken onsite. Aerial imagery of the site is carried out and survey pickups after clearing is completes, it is completed after each GDP as part of the GDP process.
Section 2.2 Determining the extent of clearing	The EPC Contractor will determine the extent of clearing to be reported in each Impacts Reconciliation Report (IRR) by using spatial analysis.	Not Applicable	IRR was not required during the reporting period. The First IRR will be due following the 30 June 2025 period.
Section 3 Reporting	Perdaman will prepare one or more IRRs to document the clearing undertaken.	Not Applicable	IRR was not required during the reporting period. The First IRR will be due following the 30 June 2025 period.
Section 3 Reporting	IRRs will be submitted to Department of Water and Environmental Regulation (DWER) for contributions payable to be determined	Not Applicable	IRR was not required during the reporting period. The First IRR will be due following the 30 June 2025 period.
Section 3.1 Frequency and Timing	IRRs will be prepared biennially (i.e., every two years).	Not Applicable	IRR was not required during the reporting period. The First IRR will be due following the 30

			June 2025 period.
Section 3.1 Frequency and Timing	The first reporting period will commence on the day clearing commences, ending on the 30th June two years following.	Not Applicable	IRR was not required during the reporting period. The First IRR will be due following the 30 June 2025 period.
Section 3.1 Frequency and Timing	Each successive reporting period runs from 1 July until the second 30 June date following.	Not Applicable	IRR was not required during the reporting period. The First IRR will be due following the 30 June 2025 period.
Section 3.1 Frequency and Timing	All Clearing activities are to be completed within the reporting periods specified in Table 7.	Not Compliant	The clearing activities listed within the IRP Rev 1 were not accurate during the implementation of the IRP rev 1 between 11 July 2023 to 10 July 2024 period. The Approval Holder rectified this issue, by amending the IRP Rev 1 to IRP Rev 2 and submitting it to DWER via email on 17 November 2023 with the revised clearing activities and associated dates. Following comments back from DWER, Rev 3 was submitted in July 2024. Table 7 in Rev 1 notes that clearing commenced 12 April 2022, however clearing did not commence until 11 July 2023. Therefore, the reporting and ground truthing dates calculated based on this proposed clearing date were not met. This non-compliance with the clearing commitments within table 7 has no impact on the environment.

Table 7 - Reporting period and frequency of the Impact Reconciliation Report

Reporting Stage	Action	Timing
Assessment Stage	Submission of IRP	08 March 2022, Rev 0
Approval Stage	Ministerial Statement Issued	24 January 2022
	EPBC Act Approval Issued	26 February 2022
Post Approval Stage	Final IRP approved and implemented	8 March 2022
	Commencement of Project	April 2022
Upfront Payment	Initial payment required prior to commencement of action EPBC Act requirement for 10 per cent of the overall clearing allowable.	April 2022
	Approval holder to submit evidence of payment to the Department of Agriculture, Water and the Environment. Must be provided within 10-days of receipt of payment.	April 2022
-	Clearing Commences	12 April 2022
Period 1	First biennial reporting period	12 April 2022 – 30 June 2024
	Aerial survey/ground-truthing Must be undertaken annually. The Consumer Price Index rate that will apply will be determined based on the financial year in which the payment to the PEOF is made.	September 2024
	Impact Reconciliation Report submitted to DWER <i>Must be submitted by 30 October 2022 in this worked example.</i>	October 2022
	Approval holder to submit evidence of payment into PEOF account to the Department of Agriculture, Water and the Environment. Must be provided within 10-days from receipt of payment.	October 2024
Period 2	Second biennial reporting period (if required)	1 July 2024 – 30 June 2026
	Aerial survey/ground-truthing Must be undertaken within 10-days either before or after the end of the biennial reporting period (i.e., 30 June).	August 2026
	Impact Reconciliation Report submitted to DWER <i>Must be submitted by 30 October 2026.</i>	October 2024

Assessment No. 2184 (WA), 2018/8383 (Commonwealth) | 21 March 2022 | Commercial in Confidence

12



Impacts Reconciliation Procedure
Perdaman Urea Project

Reporting Stage	Action	Timing
	Approval holder to submit evidence of payment into PEOF account to the Department of Agriculture, Water and the Environment. Must be provided within 10-days from receipt of payment.	October 2026
Period 3 (final)	Final Impact Reconciliation Report submitted to DWER Must be submitted by 30 October 2026	October 2026
	Approval holder to submit evidence of payment into PEOF account to the Commonwealth department of environment. Must be provided within 10-days of receipt of payment.	October 2026
	The Minister may agree to adjust the final year's payment to the Pilbara Environmental Offsets Fund and notify the approval holder in writing of the adjusted final payment amount based on evidence of the actual clearing footprint.	October 2026

<p>Section 3.1 Frequency and Timing</p>	<p>Should project clearing activities be delayed, an additional reporting period shall be included in a revised IRP.</p>	<p>Compliant</p>	<p>A revised IRP (Rev 2) was submitted to EPA/DWER on 17 November 2023 (email PUP_ACR2024-018) and included revised clearing activity dates and additional reporting period table to replace table 7 in IRP Rev 1.</p>
<p>Section 3.2 Reconciliation Report Content</p>	<p>The following information will be submitted in the Impact Reconciliation Report:</p> <ul style="list-style-type: none"> • Identification of the relevant Ministerial Statement, EPBC applicable conditions, the Project and the reporting period. • Quantification of clearing undertaken during the reporting period, identified via environmental values identified in Table 3 and Table 4 of this IRP. • Information from surveys supporting the quantification of clearing undertaken, including spatial data representing areas of ground disturbance and supporting reports. • Forward estimate of clearing. • Management Actions that were undertaken and associated adaptive management actions. • Monitoring activities and associated reporting. • Status in relation to specified completion criteria, and • Aerial imagery from Landgate or Near map will be obtained to help verify the extent of ground disturbance as mapped and reported by surveyors. 	<p>Not Applicable</p>	<p>IRR was not required during the reporting period. The First IRR will be due following the 30 June 2025 period.</p>
<p>Section 3.2 Reconciliation Report Content</p>	<p>Perdaman must report data against Table 4 to facilitate DAWE's evaluation of the performance of the offset.</p>	<p>Not Applicable</p>	<p>IRR was not required during the reporting period. The First IRR will be due following the 30 June 2025 period.</p>
<p>Section 4 Review and Implementation</p>	<p>DWER and/or DAWE at its discretion may direct Perdaman to revise this IRP.</p>	<p>Compliant</p>	<p>A revised IRP (Rev 2) was submitted to EPA on 17 November 2023 (email PUP_ACR2024-018, notes receipt of the IRP by DWER on this date) and included revised clearing activity dates and additional reporting period table to replace table 7 in</p>

			<p>IRP rev 1.</p> <p>An email was sent by Jack Goldie (EPA/DWER) on 19 March 2024 noting that there were a couple of minor changes required to wording within the IRP Rev 2 submitted. Perdaman made the required changes and resubmitted on the Plan as Rev 3 in July 2024.</p> <p>In accordance with both the MS 1180 (WA Approval and the EPBC Approval) revised IRP's do not require the 'approval' by the Minister or the CEO only to be submitted.</p> <p>The Project implemented Rev 1 during the period 11 July 2023 to 10 July 2024.</p>
<p>Section 4 Review and Implementation</p>	<p>Perdaman will continue to implement this IRP until any of the following occurs:</p> <ul style="list-style-type: none"> • DWER/DAWE approves a revised version of this IRP, at which time the revised IRP will be implemented instead. • DWER/DAWE advises in writing that this IRP no longer needs to be implemented 	<p>Compliant</p>	<p>IRP Rev 1 has been implemented during the 11 July 2023 to 10 July 2024 reporting period.</p> <p>As updates were required in accordance with the requirements of section 3.1 within the IRP Rev 1, the updated IRP (Rev 2) was sent to DWER on 17 November 2023 (email PUP_ACR2024-018).</p> <p>This commitment states the IRP needs to be approved by DWER/DAWE, however the MS 1180 (Western Australian Approval) condition 11-7(1) does not require submission or approval. It states:</p> <p>The proponent:</p> <p>(1) <i>may review and revise the Confirmed Impact Reconciliation Procedure.</i></p> <p>The EPBC Approval does not include a requirement for review, resubmission and approval of a revised IRP.</p>



5.5 Appendix A – Supporting / Verifying Information

Table 7 Supporting/Verifying Information

Type of Information	Document Code	Document Title / Information description.
Figure (Map)	PUP_ACR2024-001	Project Environmental Approval Boundaries - Figure 01B. This figure demonstrates Development Envelope Extent.
Image	PUP_ACR2024-002	Ground Disturbance Permit Register Screenshot 45826-HSE-REG-G-1001_GDP.
Figure (Map)	PUP_ACR2024-003	Map of Clearing extents demonstrating disturbance footprint and clearing occurred within the reporting period 11 July 2023 – 10 July 2024.
Figure (Map)	PUP_ACR2024-004	Map of the Aboriginal Cultural Heritage Sites (the Three Aboriginal Cultural Heritage Sites within the development envelope that were impacted).
Figure (Map)	PUP_ACR2024-005	Map of less than 0.97 hectares of National Heritage listed – Dampier Archipelago being cleared.
Letter	PUP_ACR2024-006	Confirmed Cultural Heritage Management Plan Letter Approved from DWER to Perdaman (Your Ref: PCF-PD-EN-CHMP (Our Ref: DWERVT9764-2). 22 June 2022.
Email	PUP_ACR2024-007	Confirmed Cultural Heritage Management Plan (Rev 6) notification to DCCEEW of CEO approval/submission to CEO.
Report	PUP_ACR2024-008	Compliance Assessment Report (CAR) 2023-2024
Letter /Email	PUP_ACR2024-009	Email to DWER submitting the CAR for the 2023-2024 Reporting Period.
Letter	PUP_ACR2024-010	Letter from DCCEEW to Approval holder approving the IRP (Rev 1) (7 April 2022).
Letter	PUP_ACR2024-011	Letter from Perdaman to DCCEEW notifying that GDA had commenced 11/07/2023. Letter dated 14 July 2023 (PCF-LTR-DCCEEW-00001).
Receipt Invoice	PUP_ACR2024-012	Receipt invoice demonstrating Approval Holder 10% initial offset payment to DWER
Report	PUP_ACR2024-013	Annual Report to Registrar of Aboriginal Sites 27 January 2023- 26 January 2024 Reporting Period.
Letter	PUP_ACR2024-014	Letter from Perdaman to DCCEEW and EPA notifying of revision of CHMP PCF6 to PCF8 and applicable changes (9 February 2024).
Letter	PUP_ACR2024-015	Letter from Perdaman to DCCEEW and EPA to submit PCF8 and notify when the PCF began being implemented. Dated 22 March 2024.
Email	PUP_ACR2024-016	Email to DCCEEW notifying the initial payment to the Pilbara offsets Fund was made.
Letter	PUP_ACR2024-017	Letter to DCCEEW under Section 143A OF THE EPBC ACT 1999 to amend the Threatened Species

		Management Plan.
Email	PUP_ACR2024-018	Email from EPA / DWER Jack Goldie, acknowledging receipt of the IRP submitted on the 17 November 2023. 20231117.
Email	PUP_ACR2024-019	Final electronic submission (via email notification and link) of TSMP PCF5 to DCCEEW on the 18/02/2022.
Email	PUP_ACR2024-020	Email between Perdaman confirming publication of CHMP_PCF8 to the Website on the 27 March 2024.
Document	PUP_ACR2024-021	PEOF Tax Invoice from DWER to Perdaman (Approval Holder) (dated 30/08/2022). Noting the due date of the initial 10 % is the 30/09/2022.