

COMPLIANCE ASSESSMENT REPORT (MS 1211)

REPORTING PERIOD 19 OCTOBER 2023 TO 18 OCTOBER 2024

DOCUMENT CONTROL

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1. INTRODUCTION

1.1 Background

The Mardie Salt and Potash Project (the Proposal) is to construct and operate a solar salt production plant and export facility including seawater intake, evaporation and crystalliser ponds, processing plant, trestle jetty and supporting infrastructure to produce salt and sulphate of potash, located 80 kilometres south-west of Karratha, in the Pilbara region of Western Australia.

The Mardie Salt and Potash Project is 100% owned by the Approval Holder, Mardie Minerals Pty Limited, ABN 50 152 574 457 (Mardie Minerals). Mardie Minerals is a wholly owned subsidiary of BCI Minerals Limited, ACN 120 646 927 (BCI).

Ministerial Statement No. 1175 (MS 1175) was issued for the Proposal under Part IV of the *Environmental Protection Act 1986* on 24 November 2021. MS 1175 was superseded by Ministerial Statement No. 1211 (MS 1211) for the Optimised Mardie Project on 19 October 2023.

1.2 Implementation Status

The Proposal is currently in the construction phase with activities undertaken during the reporting period including:

- Pond construction progressing – Evaporation Ponds 3 to 9 and commencement of crystalliser ponds.
- Jetty construction – bents J30 to J90.
- Several infrastructure upgrades including to access roads and communications.
- Federal approval for the Optimised Mardie Project in accordance with EPBC 2022/9169.
- Commencement of pond commissioning through filling of Ponds 1 and 2 with sea water.

1.3 Purpose and Scope

This Compliance Assessment Report (CAR) has been prepared in accordance with the Compliance Assessment Plan submitted and approved pursuant to condition D2-5 of MS 1211. This CAR covers the period 19 October 2023 – 18 October 2024, being the annual period from the issue of MS 1211.

2. ENVIRONMENTAL MANAGEMENT PLANS

Mardie Minerals has implemented all approved Environmental Management Plans as required by MS 1211. A summary of the status of each plan is provided below.

2.1 Benthic Communities and Habitat Monitoring and Management Plan

The Benthic Communities and Habitat Monitoring and Management Plan (BCHMMP) provides monitoring and management measures to be implemented by Mardie Minerals to protect the health, diversity, and extent of benthic communities and habitat (BCH). The BCHMMP was developed by O2 Marine in consultation with leading ecologists and marine scientists from Hydrobiology, Phoenix Environmental Sciences, Preston Consulting, Actis Environmental Services and the WAMSI Mardie Projects Intertidal Research Offsets Program team. In addition, leading ecologists have been engaged by Mardie Minerals to advise on intertidal ecology and have contributed to the content and methods presented in this BCHMMP.

During the reporting period the following activities were undertaken:

- Quarterly Subtidal, Algal Mat, Sapphire and landward Mangrove monitoring
- Annual seaward mangrove monitoring
- NDVI Pilot study

The plan has been implemented as per the commitments made within the approved plan and no adverse results were detected as part of the BCHMMP monitoring activities.

2.2 Marine Pest Management Procedure

No marine pest monitoring was undertaken during the reporting period as no marine vessel entered the project area; this is because marine construction works were all conducted from the crane traveller installed on top of the jetty structure.

2.3 Groundwater Monitoring and Management Plan

The purpose of the Groundwater Monitoring and Management Plan (GMMP) is to monitor changes to groundwater quality and levels from pond filling and operations to ensure that implementation of the Project does not compromise the environmental values and water quality objectives for the Mardie Project area.

The collection of baseline groundwater data continued during the reporting period with the progressive establishment of the coastal monitoring bore network being finalised in August 2024. The new bores commenced recording in March 2024.

The Groundwater Monitoring and Management Plan (GMMP) was conditionally approved by the Department of Water and Environmental Regulation (DWER) in April 2024 and by the Department of Climate Change, Energy, the Environment and Water (DCCEE) in September 2024. On 10 September 2024, the filling of evaporation pond 1 and operational monitoring of groundwater commenced.

Table 1 provides a summary of the triggers and thresholds detected during the reporting period.

Table 1: Summary of Groundwater monitoring triggers and thresholds.

Type	Triggers		Thresholds	
	Prior to 10/9/2024	After 10/9/2024	Prior to 10/9/2024	After 10/9/2024
Groundwater level				
1 day forecast	1	7	0	0
7 day forecast	37	62	0	2
Salinity				
1 day forecast	27	17	1	0
7 day forecast	75	32	3	2

The GMMP has been implemented as per the conditions of MS 1211 and the commitments made within the approved plan.

2.4 Marine Environmental Quality Monitoring and Management Plan

The purpose of the Marine Environmental Quality Monitoring and Management Plan (MEQMMP) is to establish a management framework to ensure that the implementation of the Project does not compromise the environmental values and water quality objectives for the Mardie coastal area.

Monitoring under the MEQMMP was limited to baseline data collection which was undertaken quarterly. The baseline data will be used to derive locally relevant environmental quality criteria (EQC) to inform ongoing monitoring and management.

2.5 Illumination Plan

The Illumination Plan has been developed to monitor and manage potential impacts of artificial light on fauna of conservation significance and their habitats.

During the reporting period a minor update to the Illumination Plan was undertaken to accommodate changes to lighting at the Mardie Village which was to be replaced in order to meet all required standards.

The annual light audit was conducted in September 2024, prior to the annual turtle nesting season. The lighting assessment identified that the flood lights at the Mardie Village were contributing to light pollution and needed to be replaced. This work has since been completed. The report also identified a number of light fittings that need to be altered to conform with health and safety standards.

Annual light monitoring was undertaken in December 2023 and February 2024 alongside the annual turtle monitoring program. No new light sources were detected and there was a marginal difference between the latest results and those of previous years.

All activities were undertaken as per the commitments made within the approved Illumination Plan.

2.6 Marine Turtle Monitoring and Management Plan

The Marine Turtle Monitoring Program (MTMP) has been implemented to further describe the marine turtle nesting population and habitat, and to assess any impacts Project-attributable artificial light emissions may be having on marine turtle behaviour on the nesting beach.

Annual monitoring was undertaken during October 2023, December 2023 and February 2024; these periods were selected to target the peak nesting and hatching periods for hawksbill (*Eretmochelys imbricata*), flatback (*Natator depressus*) and green turtles (*Chelonia mydas*).

All monitoring was undertaken as per the commitments within the approved plan and no issues were identified as part of the annual monitoring program. The MTMP is due to be reviewed, as per condition C1-1(2), during 2025 prior to dredging or marine construction works.

2.7 Dredge Management Plan

Dredging activities at the Mardie Salt Project are yet to commence and as such monitoring required under the Dredge Management Plan was not undertaken during the reporting period. Dredging activities are expected to commence in the next reporting period, triggering the requirement to commence monitoring.

2.8 Underwater Noise Management Procedure

The Underwater Noise Management Procedure has been developed to manage underwater noise generated from piling works and vessel operations during construction.

As part of the procedure sound measurements are taken during piling activities. Noise monitoring results have shown that sound levels have remained under the specified level during piling works undertaken during the reporting period.

There were three incidents where noise monitoring equipment failed resulting in a loss of data. These were reported to the department on 11 July 2024, 15 August 2024 and 26 August 2024.

Marine Fauna Observers were also deployed during the piling activities conducted during the year. These records show that no protected marine fauna were adversely impacted by piling works.

2.9 Mesquite Management Plan

The Mesquite Management Procedure has been developed to provide management actions for the Mesquite invasion present within the Mardie Project area in order to protect flora and vegetation so that biological diversity and ecological integrity are maintained.

Mesquite control activities were undertaken in July 2024 through the use of chemical agents in targeted areas. The physical removal of mesquite continues as part of clearing activities associated with the construction of the project. Any mesquite physically removed is burnt to reduce the potential for seed spread and germination.

2.10 *Minuria tridens* Research Strategy

It has been determined that avoidance of impacts to some plants of *Minuria tridens* (M. tridens) at the Project is unavoidable hence a Research and Offset Strategy was developed to build a knowledge base and inform the potential for re-establishment of a population of M. tridens in the region.

A part of the Research and Offset Strategy, a regional survey was undertaken in September 2024. The field survey identified six new populations of M. tridens, with a total of over 500 individuals recorded.

All requirements of the research strategy were undertaken as per the commitments within the approved strategy.

2.11 Aboriginal Cultural Heritage Management Plan

The Aboriginal Cultural Management Plan describes the process for the ongoing management of Aboriginal heritage places located within the Mardie Project area. The plan was revised during the reporting period and Revision 3 was approved by DWER on 23 August 2024.

During the reporting period, cultural surveys, salvage activities and monitoring of clearing were undertaken in accordance with the plan. All commitments within the plan were complied with and no issues were identified.

2.12 Impact Reconciliation Procedure

The Mardie Project is predicted to have a significant residual impact on environmental values and Matters of National Environmental Significance (MNES), and as such, is required to contribute funds to offset projects. The Impact Reconciliation Procedure (IRP) was updated during the reporting period to account for the approval of the Optimised Mardie Project by DWER and DCCEE; the updated IRP was approved by DWER on 22 August 2024.

3. COMPLIANCE MONITORING REPORT

A summary of monitoring activities undertaken by Mardie Minerals as required by condition C3-2 is provided in Appendix 1.

4. STATEMENT OF COMPLIANCE

An audit table for MS 1211 has been provided as Appendix 2. The audit table is prepared and maintained in accordance with the Department of Water and Environmental Regulation Post Assessment Guideline for Preparing an Audit Table.

Conditions were found to be 'Compliant', "Potentially non-compliant", "Non-compliant", "Completed" or 'Not Required' at this stage of the Project, as documented in the Audit Table, and assessed in accordance with the approved CAP.

BCI has identified six conditions that have been determined as potentially non-compliant and one condition as non-compliant. Table 2 provides a summary of the identified non-compliances.

Table 2: Non-compliances for 2023-2024 reporting period

Condition Number	Condition	Assessment
B1-1(4)	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: (4) no change in the health, extent of coverage, or species diversity of intertidal benthic communities more than 100 m seaward of the pond walls as shown in Figure 2;	Assessed as potentially non-compliant. As advised on 30 August 2024 (BCI Reference: 0000-EV-LET-0022), Mardie Minerals identified a potential non-compliance with conditions B1-1(4), B1-1(5), B1-2(2) and B3-1(3). Routine algal mat monitoring undertaken as part of the BCHMMP, identified differences between populations on either side of the temporary access track constructed across the intertidal flats.
B1-1(5)	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: (5) adverse impacts to intertidal benthic communities are limited to an area within 100 m of the pond wall defined in Figure 2	BCHMMP monitoring did not identify trigger or threshold criteria, however, the difference in appearance was of concern. Mardie Minerals undertook additional algal mat health monitoring either side of the temporary access track.
B1-2(2)	The proponent shall ensure the implementation of the proposal achieves the following environmental outcomes: (2) no development that would have an adverse impact on the ecological function of intertidal and subtidal benthic communities and habitats;	The investigation into this issue is on-going with the final report expected in February 2025. Actions taken in response to the identified issue include the installation of temporary culverts in the temporary access track and commencement of construction on the permanent causeway as per the approved causeway design.
B3-1(3)	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: (3) no changes to the extent of surface water flooding during a one (1)-year ARI or changes to tidal inundation as a result of the construction of the intertidal causeway that are greater	

	<p>than predicted in Causeway Tidal Inundation Assessment – technical memorandum (Advisian 2022);</p>	
B7-1(2)	<p>The proponent must implement the proposal to meet the following environmental outcomes:</p> <p>(2) no direct or indirect impacts to the known locations of Minnie Daisy (<i>Minuria tridens</i>) identified in the Phoenix – Targeted Pre-clearance Survey (2021), unless the CEO has confirmed by notice in writing that further investigations have demonstrated that the specimens represent adequately widespread species such that disturbance of the known specimens would not be inconsistent with the EPAs objective for Flora and Vegetation ;</p>	<p>Assessed as potentially non-compliant.</p> <p>As advised on 16 October 2024, rising water within Pond 1 may potentially impact <i>M. tridens</i> populations located on an island within Pond 1.</p> <p>Mardie Minerals has commenced pumping of water from the immediate area, undertaken irrigation with freshwater and collected material to establish an ex-situ custodial collection of <i>M. tridens</i>.</p> <p>To date, no impacts to <i>M. tridens</i> have been observed.</p>
B7-1(5)	<p>The proponent must implement the proposal to meet the following environmental outcomes:</p> <p>(5) no disturbance associated with the proposal to more than thirty (30) per cent of the currently mapped extent (256 ha) of the landward samphire vegetation described in Mardie Project – Response to Submissions (March 2021), until the CEO has confirmed by notice in writing that:</p> <p>(a) the supplementary surveys have mapped additional vegetation consistent with the description of the landward samphire in Mardie Project – Response to Submissions (March 2021); and</p> <p>(b) the additional <i>Tecticornia</i> vegetation mapped in the supplementary surveys is sufficiently widespread in the region that clearing of up to 863 ha of this vegetation would not be inconsistent with the EPA’s objectives for Flora and Vegetation.</p>	<p>Assessed as potentially non-compliant.</p> <p>Mardie Minerals has provided information to satisfy the requirements of this condition, however, no correspondence from DWER confirming this can be located.</p> <p>This issue was identified during an audit conducted by DWER during 2024 and is currently being investigated.</p>
C1-1(3)	<p>The proponent must not undertake:</p> <p>(3) transfer of seawater, brine and/or waste product associated with the</p>	<p>Assessed as non-compliant.</p>

Mardie Project until the CEO has confirmed in writing that the environmental management plan required by condition B3-2 has been updated in accordance with condition B3-3 and meets the requirements of condition C4;

Notification of a non-compliance was sent to DWER on 4 January 2024 regarding the release of seawater to Pond 1.

Remediation actions undertaken in response to this incident were the isolation of the pumps at the Primary Seawater Intake to prevent any further unauthorised transfer of seawater.

5. DECLARATION AND SIGNATURE

I confirm and acknowledge that:

- the information contained in this Compliance Assessment Report is true and correct.
- I have authorisation to endorse the Compliance Assessment Report as approved by the BCI Minerals CEO.



18 January 2025

Signature

Date

Shaun Meredith

Name

Head of Environment and Cultural Heritage

Position

Appendix 1: Compliance Monitoring Report

A summary of monitoring undertaken to support the implementation of the Mardie Salt and Potash Project is provided below. The monitoring detailed below has been implemented in order to substantiate that the limitations and extents stated in Part A and the outcomes stated in Part B of MS 1211 are being met.

PART A

Physical Elements

The project design and footprint are recorded to ensure that the project footprint remains within the development envelope and disturbance footprint limitations, as stated in Part A. Any changes to the project design or footprint are reconciled against the approved limits prior to being implemented. The total proposed footprint is tracked via the GIS Team to ensure all current and future works remain within the stated limitations.

Ground and habitat disturbance is managed through the BCI Ground Disturbance Permit (GDP) procedure. As part of this procedure, all proposed ground disturbance to be undertaken as part of the project is required to be approved through the GDP procedure. BCI staff or contractors are to make an application to the BCI GDP team prior to any activities being undertaken. The proposed clearing is captured in the BCI GIS system and the proposed clearing assessed against approval conditions. If approved, a GDP is issued to allow the disturbance to take place.

At the conclusion of clearing activities associated with a GDP, the clearing is captured via aerial imagery or ground survey and the actual disturbance area supplied to the BCI GIS team. The disturbance data is recorded and tracked against the Physical Elements listed in Part A of MS 1211.

Mardie Minerals has not exceeded any of the Physical Elements limitations or extents as specified in Part A of MS 1211 as shown by Table 1 below.

Table 1: Part A monitoring results

PHYSICAL ELEMENT	MS1211 APPROVED LIMITS (ha)	ACTUAL CLEARING UNDER MS1211 (ha)
Development envelope	Terrestrial development envelope not to exceed 19,645 ha.	The current terrestrial development envelope does not exceed 19,645 ha.
	Marine development envelope not to exceed 53 ha.	The current marine development envelope does not exceed 53 ha.
	Dredge development envelope not to exceed 307.5 ha.	The current terrestrial development envelope does not exceed 307.5 ha.
	Combined area of concentrator ponds and crystalliser ponds not to exceed 11,368 ha.	The current combined area of ponds does not exceed 11,368 ha.
Disturbance footprint	Terrestrial disturbance not to exceed 13,476 ha within 19,645 ha development envelope.	Actual terrestrial disturbance is 4953.52 ha within 19,645 ha development envelope.

Direct disturbance of native vegetation	Clearing of no more than 3,014 ha vegetation in 'good' to 'excellent' condition native vegetation.	Actual direct disturbance is 1197.18 ha vegetation in 'good' to 'excellent' condition native vegetation.
	Clearing of no more than 863 ha landward samphire.	Actual clearing is 352.31 ha.
	Clearing of no more than 330 ha of coastal samphire.	Actual clearing is 147.09 ha.
Impacts on PEC and Mangrove Habitat	No more than 145 ha direct and 20 ha indirect impacts to Horseflat PEC.	Actual impact is 60.23 ha.
	No more than 13 ha of direct disturbance to mangrove habitat outside of the RRDMMA.	Actual direct disturbance is 12.32 ha.
	No more than 4 ha of clearing within the RRDMMA inclusive of any clearing conducted by the proponent prior to the issue of this statement and clearing conducted by the proponent under any other approval mechanism subject to the requirements of conditions B3-4 and C1-1.	0.0 (no actual clearing has occurred).
Direct disturbance to Algal mats	No more than 880 ha of direct impact to algal mats.	Actual direct disturbance is 249.53 ha.
Dredging	No more than 800,000 cubic metres, directly disturbing no more than 65 ha within the 307.5 ha dredge development envelope.	0.0 (dredging activities have not commenced).
Foraging habitat for the Pilbara leaf-nosed bat (<i>Rhinonictoris aurantia</i>)	Clearing no more than 3,254 ha.	Actual clearing is 617.52 ha.
Foraging habitat for the Northern coastal free-tailed bat (<i>Ozimops cobourgiensis</i>)	Clearing no more than 1,186 ha.	Actual clearing is 511.72 ha.
Habitat for the Pilbara Olive Python (<i>Liasis olivaceus barroni</i>)	Clearing no more than 6 ha.	Actual clearing is 2.33 ha.
Foraging habitat for the Northern Quoll (<i>Dasyurus hallucatus</i>)	Clearing no more than 80 ha.	Actual clearing is 30.94.

Zone of High Impact (e.g. marine)	Marine zone of high impact to be limited to 121 ha within the 307.5 ha dredge footprint.	0.0 (dredging activities have not commenced).
Level of ecological protection areas (marine environmental quality)	Moderate ecological protection area (MEPA) not to exceed 53.9 ha.	0.0 (dredging activities have not commenced).
	Low ecological protection area (LEPA) not to exceed 20.2 ha.	0.0 (dredging activities have not commenced).
Distance between crystallisers and Mardie pool	Minimum distance of 1000 metres to be maintained between crystalliser ponds and Mardie pool.	The minimum distance between the crystallisers and Mardie Pool is 1050 m.
Drainage corridors	Minimum of two drainage corridors of a minimum of 200 metres wide to be established and aligned with existing natural drainage lines.	Two drainage corridors have been created.

Operational Elements

No groundwater abstraction for operational requirements or brine discharge has occurred during the reporting period.

Seawater intake parameters were monitored at the Primary Seawater Intake during the reporting period. Sea water pumping rates and pumping volume have been recorded to allow compliance with the Operational Elements to be assessed.

Timing Elements

The abstraction of sea water from the primary seawater intake for the filling of evaporation ponds 1 and 2 commenced on 10 September 2024 and occurred only when tides were at or above Mean Sea Level.

PART B

For outcomes stated in Part B of MS 1211 which are not covered by a management plan, the following summary is provided.

Surface water monitoring

During the reporting period, surface water monitoring was limited to tidal inundation monitoring as part of the BCHMMP. This data is collected to help inform monitoring and management actions to be undertaken in accordance with the BCHMMP.

Due to very low rainfall during the reporting period, there was no monitoring of freshwater surface flows. Mardie Minerals has established a network of surface water loggers to monitor freshwater flows which will be used to determine that there are no adverse impact to water levels or water quality in Mardie Pool as a result of surface water flows associated with the Proposal.

Water quality at Mardie Pool is monitored to determine if changes to surface water flows have an adverse effect on the Mardie Pool system. Water quality sampling is undertaken monthly.

Grey falcon nesting density

As per the terrestrial fauna surveys conducted of the project area between August 2019 and May 2021, there appear to be no natural nesting sites for the grey falcon within the Optimised Mardie Project area; it is likely the two grey falcons recorded during the survey are of a nesting pair known to use a communications tower close to Mardie Homestead which is outside of the project development envelope; extensive foraging habitat occurs within and immediately beyond the project area. Therefore, there are no known nesting sites within the project area, and no change in nesting density of grey falcon can be reported.

Weed monitoring

Mardie Minerals has implemented vehicle hygiene measures for all vehicles entering and exiting the project area. These measures aim to prevent the spread of weeds, including mesquite, and protect native flora species.

Weed species surveys are conducted as part of the annual *M. tridens* health survey which assesses if there are any threatening processes that may impact *M. tridens* populations.

The clearing of mesquite to date has resulted in a reduction in weeds present within the Mardie Project area.

MINURIA TRIDENS HEALTH

BCI has established a health monitoring programme to detect any deleterious impacts to *M. tridens* arising from the activities of the Project. An annual health survey is undertaken of populations within the development envelope to monitor the number and health of *M. tridens* and to monitor the health of surrounding vegetation and record evidence of any threatening processes.

The annual survey was undertaken in September 2024 and the report was not available at the time of submission for this report. The results will be provided in the next annual report.

Appendix 2: Audit Table

Mardie Project – Ministerial Statement 1211

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- This audit table is a summary of the requirements applying to this Proposal. Refer to the Ministerial Statement 1211 for details/precise wording of audit elements.
- Code prefixes: M = Minister’s condition, P = Proponent’s commitment, N = Procedure.
- Abbreviations: CAR = Compliance Assessment Report; CEO = Chief Executive Officer of DWER; DWER = Department of Water and Environmental Regulation.
- Compliance Status: C = Compliant, CLD = Completed, NC = Non-compliant, NR = Not Required at this stage.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MA1.1.1	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Development envelope - Terrestrial development not to exceed 19,645 ha.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	
1211:MA1.1.2	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Development envelope - Marine development envelope not to exceed 53 ha.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	
1211:MA1.1.3	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Development envelope - Dredge development envelope not to exceed 307.5 ha.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	
1211:MA1.1.4	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Development envelope - Combined area of concentrator ponds and crystalliser ponds not to exceed 11,368 ha.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	
1211:MA1.1.5	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Disturbance footprint - Terrestrial disturbance not to exceed 13,476 ha within 19,645 ha development envelope.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	Current disturbance footprint of the project is 4953.52 ha.
1211:MA1.1.6	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Direct disturbance of native vegetation - Clearing of no more than 3,014 ha vegetation in ‘good’ to ‘excellent’ condition native vegetation.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	169.5 ha was cleared during the reporting period for a total of 1197.18 ha.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MA1.1.7	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Direct disturbance of native vegetation - Clearing of no more than 863 ha landward samphire.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	71.4 ha of landward samphire was cleared during the reporting period for a total of 352.31 ha.
1211:MA1.1.8	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Direct disturbance of native vegetation - Clearing of no more than 330 ha of coastal samphire.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	15.70 ha of coastal samphire was cleared during the period for a total of 147.09 ha.
1211:MA1.1.9	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Impacts on PEC and Mangrove Habitat - No more than 145 ha direct and 20 ha indirect impacts to Horseflat PEC.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	1.9 ha of direct impacts to Horseflat PEC occurred during the reporting period and there were no indirect impacts. Total area of impacted Horseflat PEC is 60.23 ha.
1211:MA1.1.10	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Impacts on PEC and Mangrove Habitat - No more than 13 ha of direct disturbance to mangrove habitat outside of the RRDMMMA.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	0.2 ha of clearing of mangroves outside the RRDMMMA during the reporting period for a total of 12.32 ha.
1211:MA1.1.11	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Impacts on PEC and Mangrove Habitat - No more than 4 ha of clearing within the RRDMMMA inclusive of any clearing conducted by the proponent prior to the issue of this statement and clearing conducted by the proponent under any other approval mechanism subject to the requirements of conditions B3-4 and C1-1.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	No clearing within the RRDMMMA has occurred.
1211:MA1.1.12	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Direct disturbance to Algal mats - No more than 880 ha of direct impact to algal mats.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	66.2 ha of algal mat was cleared during the reporting period for a total of 249.53 ha.
1211:MA1.1.13	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Dredging - No more than 800,000 cubic metres, directly disturbing no more than 65 ha within the 307.5 ha dredge development envelope.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	Dredging operations have yet to commence.
1211:MA1.1.14	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Foraging habitat for the Pilbara leaf-nosed bat (Rhinonictis aurantia) - Clearing no more than 3,254 ha.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	88.8 ha of Pilbara Leaf-nosed Bat (PLNB) habitat cleared during the reporting period for a total of 617.52 ha.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MA1.1.15	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Foraging habitat for the Northern coastal free-tailed bat (<i>Ozimops cobourgianus</i>) - Clearing no more than 1,186 ha.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	87.2 ha of Northern Coastal Free-tailed Bat (NCFB) habitat was cleared during the reporting period for a total of 511.72 ha.
1211:MA1.1.16	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Habitat for the Pilbara Olive Python (<i>Liasis olivaceus barroni</i>) - Clearing no more than 6 ha.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	No clearing of Pilbara Olive Python habitat occurred during the reporting period. A total of 2.33 ha has been cleared.
1211:MA1.1.17	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Foraging habitat for the Northern Quoll (<i>Dasyurus hallucatus</i>) - Clearing no more than 80 ha.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	0.8 ha of Northern Quoll habitat was cleared during the reporting period for a total of 30.94 ha.
1211:MA1.1.18	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Zone of High Impact (e.g. marine) - Marine zone of high impact to be limited to 121 ha within the 307.5 ha dredge footprint.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	Bitterns disposal has not commenced.
1211:MA1.1.19	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Level of ecological protection areas (marine environmental quality) - Moderate ecological protection area (MEPA) not to exceed 53.9 ha.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	Bitterns disposal has not commenced.
1211:MA1.1.20	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Level of ecological protection areas (marine environmental quality) - Low ecological protection area (LEPA) not to exceed 20.2 ha.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	Bitterns disposal has not commenced.
1211:MA1.1.21	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Distance between crystallisers and Mardie pool - Minimum distance of 1000 metres to be maintained between crystalliser ponds and Mardie pool.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	Crystallisers have been constructed outside of the 1000 m exclusion zone.
1211:MA1.1.22	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Physical elements - Drainage corridors - Minimum of two drainage corridors of a minimum of 200 metres wide to be established and aligned with existing natural drainage lines.	Drainage corridors included in site design.	OMP Site Plan.	Overall	Ongoing	Completed	A minimum of two drainage corridors have been included in the project design and established.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MA1.1.23	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Operational elements - Groundwater abstraction - No dewatering of groundwater for any reason except to meet the requirements of condition B3-2.	No groundwater abstraction bores to be installed unless required to meet the requirements of condition B3-2.	Implement Groundwater Monitoring and Management Plan.	Overall	Ongoing	Compliant	No operational groundwater abstraction has occurred during the reporting period.
1211:MA1.1.24	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Operational elements - Marine discharge rate - Brine discharge not to exceed 5.5 GL per annum with a specific gravity of no more than 1.25 via diffuser.	Brine discharge to be monitored for annual throughput and specific gravity.	Monitoring results provided in annual CAR.	Operation	Ongoing	Compliant	Bitterns discharge is yet to commence.
1211:MA1.1.25	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Operational elements - Seawater intake - Seawater intakes to be fitted with four-sided screens designed to ensure a rate not exceeding 0.15 metres per second through the screen. Primary seawater intake is to not exceed 180 GL per annum.	Seawater intakes fitted with screens. Monitoring of annual throughput and intake velocity.	W6594 Compliance Reports for seawater intakes. Monitoring results provided in annual CAR.	Operation	Ongoing	Compliant	Seawater intakes have been fitted with screens and water velocity managed to comply with the 0.15 m/s velocity limit. Primary seawater intake for the reporting period was 18.029 GL.
1211:MA1.1.26	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Timing elements - Mine life - Up to 63 years from issue of this statement.	Life of Mine to be reviewed and renewal of approvals sought if required.	Annual CAR.	Overall	Ongoing	Compliant	
1211:MA1.1.27	Limitations and extent of proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitation or maximum extents / capacities / ranges are not exceeded: Timing elements - Seawater intake - Abstract seawater from primary and secondary intake only when tides are at or above Mean Sea Level.	Intake pumps to be set to only operate when tides are at or above Mean Sea Level. Monitoring of sea levels and pump operation times.	Annual CAR.	Overall	Ongoing	Compliant	Pumps have been set to only abstract seawater above Mean Sea Level.
1211:MB1.1.1	Benthic Communities and Habitats	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no direct loss of benthic communities and habitats outside of the dredge disturbance footprint defined in Figure 3;	Implement the Benthic Communities and Habitat Monitoring and Management Plan. Implement Dredge Management Plan	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Dredging activities are yet to commence.
1211:MB1.1.2	Benthic Communities and Habitats	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no irreversible loss of benthic communities and habitats outside of the authorised Zone of High Impact as spatially defined in Figure 3;	Implement the Benthic Communities and Habitat Monitoring and Management Plan. Implement Dredge Management Plan	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Bitterns discharge is yet to commence.
1211:MB1.1.3	Benthic Communities and Habitats	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no detectable change from the baseline state of benthic communities and habitats outside of the Zone of High Impact and authorised Zone of Moderate Impact as spatially defined in Figure 3;	Implement the Benthic Communities and Habitat Monitoring and Management Plan. Implement Dredge Management Plan	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Bitterns discharge is yet to commence.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB1.1.4	Benthic Communities and Habitats	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no change in the health, extent of coverage, or species diversity of intertidal benthic communities more than 100 m seaward of the pond walls as shown in Figure 2; and	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits. Implement the Benthic Communities and Habitat Monitoring and Management Plan.	GIS reporting tool used to track disturbance – refer to evidence folder: Monitoring results provided in annual CAR.	Overall	Ongoing	Potentially non-compliant	As per correspondence submitted to DWER on 30 August 2024, algal mat habitat to the northeast of the Temporary Access Track has been impacted.
1211:MB1.1.5	Benthic Communities and Habitats	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: adverse impacts to intertidal benthic communities are limited to an area within 100 m of the pond wall defined in Figure 2.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits. Implement the Benthic Communities and Habitat Monitoring and Management Plan.	GIS reporting tool used to track disturbance – refer to evidence folder: Monitoring results provided in annual CAR.	Overall	Ongoing	Potentially non-compliant	As per correspondence submitted to DWER on 30 August 2024, algal mat habitat to the northeast of the Temporary Access Track has been impacted.
1211:MB1.2.1	Benthic Communities and Habitats	The proponent shall ensure the implementation of the proposal achieves the following environmental outcomes: no development that would have an adverse impact on the ecological function of the RRDMMMA or the maintenance of ecological processes which sustain mangrove habitats within the RRDMMMA (shown in figure 2);	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits. Implement the Benthic Communities and Habitat Monitoring and Management Plan.	GIS reporting tool used to track disturbance – refer to evidence folder: Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Project redesigned to avoid direct impacts to RRDMMMA.
1211:MB1.2.2	Benthic Communities and Habitats	The proponent shall ensure the implementation of the proposal achieves the following environmental outcomes: no development that would have an adverse impact on the ecological function of intertidal and subtidal benthic communities and habitats;	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits. Implement the Benthic Communities and Habitat Monitoring and Management Plan.	GIS reporting tool used to track disturbance – refer to evidence folder: Monitoring results provided in annual CAR.	Overall	Ongoing	Potentially non-compliant	As per correspondence submitted to DWER on 30 August 2024, algal mat habitat to the northeast of the Temporary Access Track has been impacted.
1211:MB1.2.3	Benthic Communities and Habitats	The proponent shall ensure the implementation of the proposal achieves the following environmental outcomes: no long-term (greater than five (5) years) net detectable loss of algal mat outside of the proposal footprint;	Implement the Benthic Communities and Habitat Monitoring and Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	BCHMMP results show no long-term loss of algal mat outside the proposal footprint.
1211:MB1.2.4	Benthic Communities and Habitats	The proponent shall ensure the implementation of the proposal achieves the following environmental outcomes: no loss of subtidal benthic communities and habitat (including subtidal algae) outside the Zones of impact authorised in condition A1-1; and	Implement the Benthic Communities and Habitat Monitoring and Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	No construction or operations that may impact BCH outside the Zones of Impact has commenced.
1211:MB1.2.5	Benthic Communities and Habitats	The proponent shall ensure the implementation of the proposal achieves the following environmental outcomes: no development that would have an adverse impact on the ecological processes or habitats that sustain the bluespotted emperor (Lethrinus punctulatus) fishery.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits. Implement the Benthic Communities and Habitat Monitoring and Management Plan.	GIS reporting tool used to track disturbance – refer to evidence folder: Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Dredging activities are yet to commence.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB1.3.1	Benthic Communities and Habitats	The proponent must implement the proposal to meet the following environmental objectives: minimise impacts to subtidal habitats;	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits. Implement the Benthic Communities and Habitat Monitoring and Management Plan.	GIS reporting tool used to track disturbance – refer to evidence folder: Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	BCHMMP results show that there has been no impact to subtidal habitats attributable to the project.
1211:MB1.3.2	Benthic Communities and Habitats	The proponent must implement the proposal to meet the following environmental objectives: changes to the health, diversity, and extent of benthic communities and habitat (including subtidal macroalgae) as a result of changes to surface water, groundwater quality, groundwater regimes, and marine environmental quality associated with the proposal are detected as early as possible; and	Implement the Benthic Communities and Habitat Monitoring and Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	The BCHMMP and GMMP have been implemented with monitoring regimes designed to detect changes as early as possible.
1211:MB1.3.3	Benthic Communities and Habitats	The proponent must implement the proposal to meet the following environmental objectives: adverse impacts to benthic communities and habitat (including subtidal macroalgae) are addressed using best-practice available management mitigation and contingency measures.	Implement the Benthic Communities and Habitat Monitoring and Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Management actions that will be used if adverse impacts are detected will use best-practice measures.
1211:MB1.4.1	Benthic Communities and Habitats	The proponent must: implement the Benthic Communities and Habitat Monitoring and Management Plan environmental management plan (BCHMMP Rev C, O2 Marine March 2023), with the purpose of ensuring the benthic communities and habitat environmental outcomes in condition B1-1 (1) to (5), B1-2 (1) to (5), the objectives in B1-3 (1) to (3) and the requirements of B3-4 is achieved, monitored and substantiated;	Implement the Benthic Communities and Habitat Monitoring and Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	The BCHMMP has been implemented.
1211:MB1.4.2	Benthic Communities and Habitats	The proponent must: review the BCHMMP environmental management plan (Rev C, O2 Marine March 2023), within one (1) year of the date of this statement to include: a) specific measures to monitor the health and species diversity biodiversity of benthic communities, in addition to monitoring of extent; b) specific measures to monitor, whether there are adverse impacts on ecological process or habitats that sustain the bluespotted emperor (Lethrinus punctulatus) fishery and prawn fishery; c) proven contingency measures and remediation actions, including commitments to amend and reduce operations to ensure environmental outcomes are achieved; and d) the relationship between the BCHMMP environmental management plan and the Groundwater Monitoring Management Plan and how these plans work together to ensure overlapping and holistic impacts are managed and monitored, to ensure the environmental outcomes and objectives relevant to both plans are achieved;	Review the Benthic Communities and Habitat Monitoring and Management Plan.	Benthic Communities and Habitat Monitoring and Management Plan	Overall	By 18 October 2024.	Completed	BCHMMP was reviewed and updated to include requirements of condition B1-4(2). The updated BCHMMP was provided to DWER on 19 October 2024.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB1.4.3	Benthic Communities and Habitats	The proponent must: commission an independent expert peer review of the BCHMMP environmental management plan (Rev C, O2 Marine, March 2023) within three years or once preliminary results from the Mardie Project Marine Intertidal Research Offsets Program have been released, whichever occurs sooner, for the purpose of reviewing whether the plan remains fit for purpose for achieving, monitoring and substantiating outcomes specified in condition B1-3(2) to (5) and B1-4 and objectives in B1-3 (1) to (3); and	Conduct peer review of BCHMMP. Results from Marine Intertidal Research Offsets Program.	Peer review report	Overall	By 18 October 2026.	Not Required	
1211:MB1.4.4	Benthic Communities and Habitats	The proponent must: Update the BCHMMP environmental management plan in accordance with the recommendations of the peer review.	Update the Benthic Communities and Habitat Monitoring and Management Plan.	Updated Benthic Communities and Habitat Monitoring and Management Plan	Overall	After peer review.	Not Required	
1211:MB2.1.1	Marine Pests	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no introduction or establishment of marine pests in the State Waters as a result of the proposal.	Implement the Marine Pests Management Procedure Monitoring of marine pests.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	
1211:MB2.2	Marine Pests	The proponent must implement the Marine Pest Management Procedure (Rev 1, dated 1 September 2022) environmental management plan, with the purpose of ensuring the environmental outcomes in condition B1-1 (the benthic community and habitat) and B2-1 are achieved, monitored and substantiated.	Implement the Marine Pests Management Procedure Monitoring of marine pests and BCH.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	The Marine Pest Management Procedure has been implemented, however, no marine vessels have entered the project area during the reporting period.
1211:MB3.1.1	Inland Waters	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no adverse impact to water levels or water quality water quality in Mardie Pool as a result of changes to groundwater regimes or groundwater quality;	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits. Implement the Groundwater Monitoring and Management Plan.	GIS reporting tool used to track disturbance – refer to evidence folder: Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Mardie Minerals has implemented the GMMP.
1211:MB3.1.2	Inland Waters	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no adverse impact to water levels or water quality in Mardie Pool as a result of surface water flows associated with the proposal;	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits. Develop and implement surface water monitoring program.	GIS reporting tool used to track disturbance – refer to evidence folder: Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	
1211:MB3.1.3	Inland Waters	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no changes to the extent of surface water flooding during a one (1)-year ARI or changes to tidal inundation as a result of the construction of the intertidal causeway that are greater than predicted in Causeway Tidal Inundation Assessment – technical memorandum (Advisian 2022);	Develop and implement surface water monitoring program.	Monitoring results provided in annual CAR.	Overall	Ongoing	Potentially non-compliant	As per correspondence submitted to DWER on 30 August 2024, algal mat habitat to the northeast of the Temporary Access Track has been impacted.
1211:MB3.1.4	Inland Waters	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no changes to the health, extent or diversity of intertidal benthic communities and habitat, including mangrove, coastal samphire and algal mat as a result of changes to groundwater regimes or groundwater quality associated with the proposal;	Implement the Benthic Communities and Habitat Monitoring and Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	BCHMMP monitoring results have not indicated any adverse impacts.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB3.1.5	Inland Waters	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: decreased freshwater inundation attributable to the project to no more than 40.2 ha of coastal samphire;	Develop and implement surface water monitoring program.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	BCHMMP results have not indicated any adverse impacts to coastal samphire.
1211:MB3.1.6	Inland Waters	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: decreased freshwater inundation attributable to the project to <u>no</u> more than 1.8 ha mangroves within the RRDMMMA;	Develop and implement surface water monitoring program.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	BCHMMP results have not indicated any adverse impacts to mangroves.
1211:MB3.1.7	Inland Waters	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: decreased freshwater inundation attributable to the project to <u>no</u> more than 4.8 ha mangroves outside of the RRDMMMA, subject to the requirements of condition A1-1;	Develop and implement surface water monitoring program.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	BCHMMP results have not indicated any adverse impacts to mangroves.
1211:MB3.1.8	Inland Waters	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: decreased freshwater inundation attributable to the project of no more than 195.2 ha algal mat; and	Implement the Benthic Communities and Habitat Monitoring and Management Plan. Develop and implement surface water monitoring program.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	BCHMMP results have not indicated any adverse impacts from freshwater inundation.
1211:MB3.1.9	Inland Waters	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no changes to the health, extent or diversity of intertidal benthic communities and habitat, including mangrove, coastal samphire and algal mat as a result of erosion.	Implement the Benthic Communities and Habitat Monitoring and Management Plan. Develop and implement surface water monitoring program.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	BCHMMP results have not indicated any adverse impacts due to erosion.
1211:MB3.2.1	Inland Waters	The proponent must: implement the Groundwater Monitoring and Management Plan (GMMP; Rev F, submitted March 2023), once updated and approved in accordance with condition B3-3, and subject to the requirements of condition C1-1(3) , with the purpose of ensuring the benthic communities and habitat environmental outcomes in condition B3-1 (1) and (4) and condition B1-2 are achieved, monitored, substantiated and satisfy the requirements of conditions C4 and condition C5; and	Implement updated Groundwater Monitoring and Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	GMMP updated to Revision K which was approved by DWER on 3 April 2024 and implemented. Revision M was implemented on 10 September 2024.
1211:MB3.2.2	Inland Waters	The proponent must: review the GMMP environmental management plan (Rev F, submitted March 2023); within one (1) year of the date of this statement to include : (a) the relationship between the GMMP environmental management plan and the BCHMMP environmental management plan, and how these plans work together to ensure overlapping and holistic impacts are managed and monitored, to ensure the environmental outcomes and objectives relevant to both plans are achieved.	Update Groundwater Monitoring and Management Plan.	Updated plan	Overall	By 18 October 2024.	Completed	Revision K includes required information.
1211:MB3.3	Inland Waters	The proponent must: The GMMP (Rev F, submitted March 2023) environmental management plan required by condition B3-2 is to be updated with project specific trigger values at the completion of baseline data collection.	Update Groundwater Monitoring and Management Plan.	Updated plan	Overall	At completion of baseline data collection.	Completed	Revision K and subsequent revisions contain trigger values.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB3.4.1	Inland Waters	The proponent shall submit a revised design for disturbance within the RRDMMMA to the CEO which meets the outcome of condition B1-2(1). The revised design shall include the following: evaluation of how the mangrove habitat in the RRDMMMA will be affected by the direct and indirect impacts associated with the revised design of the proposal (including consideration of mangrove habitats, dependent habitats, ecological function and ecological processes which sustain the mangrove habitat, and worst-case scenarios);	Revised design submitted.	Updated design.	Overall	Prior to ground disturbing activities within the RRDMMMA.	Compliant	BCI submitted a revised design to DWER on 17 April 2024 which was approved on 2 May 2024.
1211:MB3.4.2	Inland Waters	The proponent shall submit a revised design for disturbance within the RRDMMMA to the CEO which meets the outcome of condition B1-2(1). The revised design shall include the following: evaluation of the significance of the effects determined in accordance with condition B3-4(1);	Revised design submitted.	Updated design.	Overall	Prior to ground disturbing activities within the RRDMMMA.	Compliant	BCI submitted a revised design to DWER on 17 April 2024 which was approved on 2 May 2024.
1211:MB3.4.3	Inland Waters	The proponent shall submit a revised design for disturbance within the RRDMMMA to the CEO which meets the outcome of condition B1-2(1). The revised design shall include the following: consideration of the following in conditions B3-4(1) and B3-4(2): (a) quantification of the cumulative impacts of the proposal within the RRDMMMA, including direct and indirect impacts, and impacts to mangrove capacity to adapt to sea-level rise; (b) modelling of changes to surface water flows as a result of the proposal, including impacts to drainage lines or hydrological features that may support mangroves; and (c) any seepage recovery infrastructure that could be required within the area under condition C4 and C5;	Revised design submitted.	Updated design.	Overall	Prior to ground disturbing activities within the RRDMMMA.	Compliant	BCI submitted a revised design to DWER on 17 April 2024 which was approved on 2 May 2024.
1211:MB3.4.4	Inland Waters	The proponent shall submit a revised design for disturbance within the RRDMMMA to the CEO which meets the outcome of condition B1-2(1). The revised design shall include the following: demonstration that the implementation of the proposal will not have an adverse impact on the ecological function of the RRDMMMA and the maintenance of ecological processes which sustain the mangrove habitats;	Revised design submitted.	Updated design.	Overall	Prior to ground disturbing activities within the RRDMMMA.	Compliant	BCI submitted a revised design to DWER on 17 April 2024 which was approved on 2 May 2024.
1211:MB3.4.5	Inland Waters	The proponent shall submit a revised design for disturbance within the RRDMMMA to the CEO which meets the outcome of condition B1-2(1). The revised design shall include the following: demonstration that the proposal includes best practice design, management, monitoring and contingency measures to achieve the outcome of condition B1-2(1);	Revised design submitted.	Updated design.	Overall	Prior to ground disturbing activities within the RRDMMMA.	Compliant	BCI submitted a revised design to DWER on 17 April 2024 which was approved on 2 May 2024.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB3.4.6	Inland Waters	The proponent shall submit a revised design for disturbance within the RRDMMMA to the CEO which meets the outcome of condition B1-2(1). The revised design shall include the following: maps of the RRDMMMA which may be directly or indirectly affected by the proposal showing in detail: (a) the location of mangroves; (b) all drainage lines and other hydrological and ecological features that may support mangrove habitat; and (c) areas which may be directly or indirectly affected by the proposal, including reasonable buffer area, as agreed by the CEO, to account for extent of indirect impacts;	Revised design submitted.	Updated design.	Overall	Prior to ground disturbing activities within the RRDMMMA.	Compliant	BCI submitted a revised design to DWER on 17 April 2024 which was approved on 2 May 2024.
1211:MB3.4.7	Inland Waters	The proponent shall submit a revised design for disturbance within the RRDMMMA to the CEO which meets the outcome of condition B1-2(1). The revised design shall include the following: a peer review of the design, and evaluation required by conditions B3-4(1) and B3-4(2) carried out by an independent person or independent persons with relevant expertise determined by the CEO, that provides an analysis of whether the revised design would meet the outcome of condition B1-2(1).	Revised design submitted. Peer review.	Updated design.	Overall	Prior to ground disturbing activities within the RRDMMMA.	Compliant	BCI submitted a revised design to DWER on 17 April 2024 which was approved on 2 May 2024.
1211:MB4.1.1	Marine Environmental Quality	The proponent must ensure the implementation of the proposal achieves the following environment objective: no impacts on the environmental values of Ecosystem Health, Fishing and Aquaculture, Recreation and Aesthetics, Industrial Water Supply, Cultural and Spiritual.	Implement the Marine Environmental Quality Monitoring and Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	The MEQMMP has been implemented.
1211:MB4.2.1	Marine Environmental Quality	The proponent must ensure the implementation of the proposal achieves the following environmental outcome: the levels of ecological protection to be achieved inside of the: (a) Low Ecological Protection Area shown in Figure 4 and described in the spatial data in schedule 1; (b) Moderate Ecological Protection Area shown in Figure 4 and described in the spatial data in schedule 1; (c) High Ecological Protection Area described in the spatial data in schedule 1; and (d) Maximum Ecological Protection Area described in the spatial data in schedule 1, is consistent with the method for deriving Environmental Quality Guidelines and Environmental Quality Standards for the corresponding level of ecological protection described in Appendix 1, Table 1 EPA Technical Guidance - Protecting the Quality of Western Australia's Marine Environment (EPA 2016).	Implement the Marine Environmental Quality Monitoring and Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	The MEQMMP has been implemented. No construction or operational activities have been undertaken during the reporting period that have impacted the Ecological Protection Areas.
1211:MB4.3.1	Marine Environmental Quality	The proponent must: implement the Marine Environmental Quality Monitoring Management Plan environmental management plan (Rev 8 O2 Marine, submitted March 2023), with the purpose of ensuring the Marine Environmental Quality and Benthic Community and Habitat environmental objectives in conditions B4-1 and B1-3, and outcomes in B4-2 and B1-1 are achieved, monitored and substantiated and satisfies the requirements of conditions C4 and condition C5; and	Implement the Marine Environmental Quality Monitoring and Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	The MEQMMP has been implemented.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB4.3.2	Marine Environmental Quality	The proponent must: if directed by the CEO, in consultation with DWER, revise the trigger and threshold values, EQG and EQS within the MEQMMP environmental management plan required under condition B4-3(1) to ensure they are defined in a manner consistent with the EPA Technical Guidance - Protecting the Quality of Western Australia's Marine Environment (EPA 2016).	Revise Marine Environmental Quality Monitoring and Management Plan.	Updated plan	Overall	If directed.	Not Required	Mardie Minerals has not received any direction to revise triggers and threshold values.
1211:MB4.4	Marine Environmental Quality	Within five (5) years of the end of the mine life, the proponent shall ensure that all infrastructure associated with the proposal including the trestle jetty, bitterns diffuser, boat launching facilities and loading facilities that: (1) are not located on a mining tenement administered under the Mining Act 1978; and (2) have not been agreed by notice in writing from the CEO to be retained through transfer of responsibility to a responsible authority or operator, is safely decommissioned and removed from the development envelopes for disposal.	Decommission and remove facilities as required.	Decommissioning Report. Written correspondence from CEO to be attached when required.	Overall	Within 5 years of end of mine life.	Not Required	
1211:MB5.1.1	Marine Fauna	The proponent shall implement the proposal to achieve the following environmental outcomes: no mortality, injury, disturbance or displacement of humpback whales (<i>Megaptera novaeangliae</i>) within the migration of the biologically important area ;	Implement the Dredge Management Plan. Implement the Underwater Noise Management Procedure.	Records of fauna logs.	Overall	Ongoing	Compliant	There have been no impacts to humpback whales during the reporting period.
1211:MB5.1.2	Marine Fauna	The proponent shall implement the proposal to achieve the following environmental outcomes: no change in marine turtle orientation (i.e. misorientation or disorientation) nesting beach utilisation, nesting success or hatchling survivorship as a result of artificial light emissions at both sandy beach habitat adjacent to the development and Long Island, Sholl Island and the Passage Islands (Angle, Middle and Round); and	Implement the Illumination Plan. Implement the Marine Turtle Monitoring Program.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Turtle monitoring results indicate there has been no impact.
1211:MB5.1.3	Marine Fauna	The proponent shall implement the proposal to achieve the following environmental outcomes: significant marine fauna are not prevented/deterred from undertaking critical behaviours in biologically important areas.	Implement the Dredge Management Plan. Implement the Underwater Noise Management Procedure.	Records of fauna logs.	Overall	Ongoing	Compliant	No significant marine fauna have been prevented from undertaking critical behaviours due to the project activities.
1211:MB5.2.1	Marine Fauna	The proponent shall implement the proposal to achieve the following environmental objectives: minimise the risk of physical injury or mortality from vessel strike on significant marine fauna; and	Implement the Dredge Management Plan.	Records of fauna logs.	Overall	Ongoing	Compliant	No project vessels entered the development envelope during the reporting period.
1211:MB5.2.2	Marine Fauna	The proponent shall implement the proposal to achieve the following environmental objectives: minimise the risk of behavioural changes, health impacts, physical injury or mortality from underwater noise emissions from construction or operations to significant marine fauna (including temporary or permanent hearing loss).	Implement the Dredge Management Plan. Implement the Underwater Noise Management Procedure.	Records of fauna logs.	Overall	Ongoing	Compliant	Underwater Noise Management Procedure implemented with no impacts to marine fauna.
1211:MB5.3.1	Marine Fauna	The proponent must in consultation with DWER: develop and implement a Mardie Illumination Plan environmental management plan that satisfy the requirements of condition C4 and demonstrates how achievement of the significant marine fauna outcomes in B5-1(2-3) will be monitored and substantiated, and submit it to the CEO; and	Implement the Illumination Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Illumination Plan has been implemented.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB5.3.2	Marine Fauna	The proponent must in consultation with DWER: implement the Marine Turtle Monitoring Program (rev 3, submitted, May 2023) environmental management plan that satisfy the requirements of condition C4 and demonstrates how achievement of the significant marine fauna outcomes in B5-1(2-3) will be monitored and substantiated, and submit it to the CEO.	Implement the Marine Turtle Monitoring Program.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Marine Turtle Monitoring Program (Rev 3) has been implemented. A revised Marine Turtle Monitoring and Management Plan is yet to be submitted to the department.
1211:MB5.4	Marine Fauna	The proponent must implement the Dredge Management Plan environmental management plan (Rev 6, O2 Marine March 2023) with the purpose of ensuring that Marine Fauna, Benthic communities and habitats and marine environmental quality environmental outcomes in conditions B5-1(1), B1-1, B4-1 and B4-2 and objectives in conditions B5-2, and B1-3 are achieved, monitored and substantiated.	Implement the Dredge Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	The Dredge Management Plan has been implemented, through undertaking baseline monitoring. No dredging has occurred to date.
1211:MB5.5	Marine Fauna	The proponent must impose a speed limit of eight (8) knots on all project related vessels and export vessels within a five (5) kilometre approach radius of the export jetty.	Implement speed limits for all vessels within project area		Overall	Ongoing	Compliant	Export of product has not commenced so no project related vessels have entered the 5 km radius of the jetty during the reporting period.
1211:MB5.6.1	Marine Fauna	The proponent must undertake the following during pile driving activities: soft start-up procedures for a period of at least thirty (30) minutes prior to the commencement of each pile driving event, including recommencement after suspension of piling activities;	Implement Underwater Noise Management Procedures.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	As per the Underwater Noise Management Procedure a soft start was undertaken for all piling activities.
1211:MB5.6.2	Marine Fauna	The proponent must undertake the following during pile driving activities: pile driving activities to take place during daylight hours only;	Implement Underwater Noise Management Procedures.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	No pile driving activities occurred at night.
1211:MB5.6.3	Marine Fauna	The proponent must undertake the following during pile driving activities: implement a significant marine fauna observation zone consisting of at least a two (2) kilometre radius from the noise emitting source whereby a suitably qualified and experienced marine fauna observer must undertake continuous significant marine fauna observation for a minimum of thirty (30) minutes prior to the commencement of pile driving and at all times during pile driving activities;	Implement Underwater Noise Management Procedures.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Experienced Marine Fauna Observers (MFO) were in place and monitored the observation zone.
1211:MB5.6.4	Marine Fauna	The proponent must undertake the following during pile driving activities: implement an exclusion zone consisting of at least one (1) kilometre radius from the noise emitting source whereby: (a) pile driving cannot commence should significant marine fauna be within the exclusion zone; and (b) pile driving activities to cease should significant marine fauna enter the exclusion zone during pile driving are not to recommence until the animal(s) have moved outside the exclusion zone.	Implement Underwater Noise Management Procedures.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Experienced Marine Fauna Observers (MFO) were in place and monitored the exclusion zone.
1211:MB5.6.5	Marine Fauna	The proponent must undertake the following during pile driving activities: must engage suitably qualified and experienced marine fauna observer(s) who have a demonstrated knowledge of significant marine fauna in the North-West region to undertake continuous observations in the observation zone and exclusion zone;	Implement Underwater Noise Management Procedures.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB5.6.6	Marine Fauna	The proponent must undertake the following during pile driving activities: maintain a log of recorded sightings, locations and behaviours indicative of stress or disturbance of significant marine fauna, and submit these to the National Cetacean Sighting Database; and	Implement Underwater Noise Management Procedures.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	MFOs maintained records of observations.
1211:MB5.6.7	Marine Fauna	The proponent must undertake the following during pile driving activities: document and report to the CEO, DCCEEW and DBCA any incidents relating to significant marine fauna injury / mortality.	Implement Underwater Noise Management Procedures.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	No incidents have occurred during the reporting period.
1211:MB5.7.1	Marine Fauna	During dredging, spoil disposal and seabed levelling activities, the proponent shall: implement measures to avoid vessel strikes with significant marine fauna;	Implement the Dredge Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	No activities undertaken during the reporting period.
1211:MB5.7.2	Marine Fauna	During dredging, spoil disposal and seabed levelling activities, the proponent shall: implement measures to minimise direct entrainment impacts to significant marine fauna, including not operating dredge pumps during transit and dredge cutterhead lowered to surface before commencement of soft start procedure;	Implement the Dredge Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	No activities undertaken during the reporting period.
1211:MB5.7.3	Marine Fauna	During dredging, spoil disposal and seabed levelling activities, the proponent shall: install overflow screen on dredgers to visually assess for turtles and/or turtle remains that may have been entrained during dredging after each load;	Implement the Dredge Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	No activities undertaken during the reporting period.
1211:MB5.7.4	Marine Fauna	During dredging, spoil disposal and seabed levelling activities, the proponent shall: implement a significant marine fauna observation zone consisting of a at least three (3) kilometre radius from the dredging activity whereby an observer must undertake significant marine fauna observation for a minimum of thirty (30) minutes prior to the commencement of dredging and at all times during dredging activities;	Implement the Dredge Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	No activities undertaken during the reporting period.
1211:MB5.7.5	Marine Fauna	During dredging, spoil disposal and seabed levelling activities, the proponent shall: implement an exclusion zone consisting of at least 500 metre radius from the dredging activity whereby: (a) dredging cannot commence should a significant marine fauna be within the exclusion zone; and (b) dredging activities to cease should a significant marine fauna enter the exclusion zone during dredging and are not to recommence until the significant marine fauna have moved outside the exclusion zone;	Implement the Dredge Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	No activities undertaken during the reporting period.
1211:MB5.7.6	Marine Fauna	During dredging, spoil disposal and seabed levelling activities, the proponent shall: must engage a suitably qualified and experienced marine fauna observer who has a demonstrated knowledge of significant marine fauna in the North-West region to undertake observations in the observation zone and exclusion zone;	Implement the Dredge Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	No activities undertaken during the reporting period.
1211:MB5.7.7	Marine Fauna	During dredging, spoil disposal and seabed levelling activities, the proponent shall: maintain a log of recorded sightings, locations and behaviours indicative of stress or disturbance of significant marine fauna and submit these to the National Cetacean Sighting Database; and	Implement the Dredge Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	No activities undertaken during the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB5.7.8	Marine Fauna	During dredging, spoil disposal and seabed levelling activities, the proponent shall: document and report to relevant regulators: (a) any incidents relating to significant marine fauna injury / mortality; and (b) where turtles are a consideration the effectiveness of mitigation measures to prevent turtle injury and mortality.	Implement the Dredge Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	No activities undertaken during the reporting period.
1211:MB5.8	Marine Fauna	The proponent shall not conduct dredging during the period October–March (inclusive) or pile driving during the period September–January (inclusive), unless the CEO has confirmed otherwise by notice in writing.	Implement the Dredge Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Approval from DWER received to undertake piling activities during the September 2023 to January 2024 period. No dredging activities have been undertaken.
1211:MB5.9	Marine Fauna	Clearing in the fauna habitat type identified as low-quality turtle nesting habitat (sandy beach habitat) in the Mardie Project – Environmental Review Document (June 2020) is limited to a width of fifty (50) metres, parallel to the high water mark.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	No clearing within turtle nesting habitat occurred during the reporting period.
1211:MB6.1.1	Terrestrial Fauna	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no change in the abundance and diversity of migratory shorebirds utilising coastal samphire and mudflat habitats;	Implement the Migratory Shorebird Monitoring Program.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	No impacts to migratory shorebirds due to the project have been identified.
1211:MB6.1.2	Terrestrial Fauna	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no change in the nesting density of grey falcons (<i>Falco hypoleucos</i>);	Implement the Migratory Shorebird Monitoring Program.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	
1211:MB6.1.3	Terrestrial Fauna	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: maintain habitat connectivity, retention of a vegetation corridor between exclusion zone/s and similar habitat outside the impact area fifty (50) m exclusion zone around one (1) record of short range endemic fauna as shown in Figure 5;	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	Exclusion zone and buffer zone in place.
1211:MB6.1.4	Terrestrial Fauna	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: no direct or indirect disturbance within the fifty (50) m short range endemic exclusion zone as shown in Figure 5; and	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	Exclusion zone and buffer zone in place.
1211:MB6.1.5	Terrestrial Fauna	The proponent must ensure the implementation of the proposal achieves the following environmental outcomes: disturbance within the northern quoll (<i>Dasyurus hallucatus</i>) foraging habitat to only occur during daylight hours;	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	All clearing within the Northern Quoll habitat areas occurred during daylight hours.
1211:MB6.2.1	Terrestrial Fauna	The proponent must implement the proposal to meet the following environmental objectives: minimise the risk of physical injury or mortality from construction or operation on native fauna.	Implement the Construction Environmental Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	
1211:MB6.3.1	Terrestrial Fauna	During construction and operation, vehicle and machinery speed limits shall not exceed: forty (40) km/hr within the northern quoll (<i>Dasyurus hallucatus</i>) foraging habitat on Mardie Road from dusk to dawn and sixty (60) km/hr during daylight hours.	Implement the Construction Environmental Management Plan. Establish speed zones	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Speed zones have been established within the Northern Quoll foraging habitat.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB6.4	Terrestrial Fauna	The proponent must, in consultation with DWER, DCCEEW and a biostatistician who is nominated or approved by the CEO, prepare a Migratory Shorebird Monitoring and Management plan (environmental management plan) that satisfies the requirements of condition C4 and demonstrates how achievement of the Terrestrial Fauna environmental outcomes in condition B6-1(1) will be monitored and substantiated, and submit it to the CEO .	Develop and submit Migratory Shorebird Monitoring and Management Plan.	Submit management plan.	Overall	Prior to ground disturbing activities for significant amendment.	Completed	Revision 3 of the plan was submitted to DWER on 18 August 2024 and approved on 10 September 2024, prior to ground disturbing activities for the significant amendment.
1211:MB6.5	Terrestrial Fauna	The proponent must develop and implement the Mardie Illumination Plan with the purpose of ensuring that Terrestrial Fauna environmental outcomes in condition B6-1(1), B6-1(2) are achieved, monitored and substantiated and that condition B5-3(1) is met.	Develop and implement the Illumination Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Illumination Plan has been implemented.
1211:MB6.6.1	Terrestrial Fauna	The proponent shall avoid clearing any areas designated as having moderate or high prospectivity for short range endemic invertebrates in the Mardie Project – Response to Submissions (March 2021), until the CEO has confirmed by notice in writing that the proponent has demonstrated avoidance and minimisation of impacts to any confirmed short range endemic habitat such that the outcome of condition B6-1(4) has been met including: (a) avoidance of taking construction material from any mudflat islands confirmed to be habitat for short range endemic species.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	No construction material has been taken from mudflat islands during the reporting period.
1211:MB7.1.1	Flora and Vegetation	The proponent must implement the proposal to meet the following environmental outcomes: no more than 165 ha of cumulative impacts to the Horseflat PEC as a result of the proposal, including direct impacts of no more than 145 ha;	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	1.9 ha of direct impacts to Horseflat PEC occurred during the reporting period and there were no indirect impacts. Total area of impacted Horseflat PEC is 60.23 ha.
1211:MB7.1.2	Flora and Vegetation	The proponent must implement the proposal to meet the following environmental outcomes: no direct or indirect impacts to the known locations of Minnie Daisy (<i>Minuria tridens</i>) identified in the Phoenix – Targeted Pre-clearance Survey (2021), unless the CEO has confirmed by notice in writing that further investigations have demonstrated that the specimens represent adequately widespread species such that disturbance of the known specimens would not be inconsistent with the EPAs objective for Flora and Vegetation ;	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Potentially non-compliant	Notification was sent to DWER on 16 October 2024 regarding a potential non-compliance due to rising water threatening <i>M. tridens</i> populations on an island within Pond 1. No impacts to <i>M. tridens</i> have been observed at the time of this report and the issue is currently under investigation.
1211:MB7.1.3	Flora and Vegetation	The proponent must implement the proposal to meet the following environmental outcomes: no direct impacts or indirect impacts to any known locations of the sterile, potentially rare or novel Tecticornia Taxa, identified within Phoenix – Detailed Flora and Vegetation Survey for the Mardie Project (2020), unless the CEO has confirmed by notice in writing that further investigations have demonstrated that the specimens represent adequately widespread species such that disturbance of the known specimens would not be inconsistent with EPA’s objective for Flora and Vegetation;	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	
1211:MB7.1.4	Flora and Vegetation	The proponent must implement the proposal to meet the following environmental outcomes: ensure there are no indirect impacts from the introduction or spread of environmental weeds compare with pre-construction condition;	Implement the Construction Environmental Management Plan. Implement the Mesquite Management Plan	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Weed management activities were undertaken during the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB7.1.5	Flora and Vegetation	The proponent must implement the proposal to meet the following environmental outcomes: no disturbance associated with the proposal to more than thirty (30) per cent of the currently mapped extent (256 ha) of the landward samphire vegetation described in Mardie Project – Response to Submissions (March 2021), until the CEO has confirmed by notice in writing that: (a) the supplementary surveys have mapped additional vegetation consistent with the description of the landward samphire in Mardie Project – Response to Submissions (March 2021); and (b) the additional Tecticornia vegetation mapped in the supplementary surveys is sufficiently widespread in the region that clearing of up to 863 ha of this vegetation would not be inconsistent with the EPA's objectives for Flora and Vegetation.	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Potentially non-compliant	71.4 ha of landward samphire was cleared during the reporting period for a total of 352.31 ha. A DWER audit of MS 1175 undertaken in 2024, identified that the CEO may not have provided notice confirming the requirements of this condition. Mardie Minerals has provided the required information to DWER.
1211:MB7.2	Flora and Vegetation	The proponent shall implement the approved <i>Minuria tridens</i> research strategy (Version approved 20 September 2022)	Implement <i>Minuria tridens</i> Research Strategy.	Research results provided in annual CAR.	Overall	Ongoing	Compliant	Research Strategy has been implemented; regional survey to identify <i>M. tridens</i> populations outside of the Project development envelope and an annual health monitoring survey of <i>M. tridens</i> were completed during the reporting period.
1211:MB8.1.1	Aboriginal Cultural Heritage	The proponent must implement the proposal to meet the following environmental outcomes: no direct disturbance of the Aboriginal cultural heritage exclusion zones for Peters Creek as shown in Figure 5 and described in the spatial data in schedule 1; and	Implement the Cultural Heritage Management Plan. Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Project re-design avoids any disturbance near Peters Creek site.
1211:MB8.1.2	Aboriginal Cultural Heritage	The proponent must implement the proposal to meet the following environmental outcomes: subject to reasonable health and safety requirements, no interruption of ongoing access to land utilised for traditional use or custom by the Yaburara and Mardudhunera People and Robe River Kuruma People.	Implement Cultural Heritage Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	There is ongoing access to land (e.g. Mardie Pool) utilised for traditional use by Traditional Owners.
1211:MB8.2.1	Aboriginal Cultural Heritage	The proponent must implement the proposal to meet the following environmental objectives: avoid, where practicable, and otherwise minimise direct disturbance to Aboriginal Cultural Heritage sites;	Implement the Cultural Heritage Management Plan. Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Disturbance of Aboriginal heritage values has been restricted to only specific sites as specifically approved in accordance with section 18 of the <i>Aboriginal Heritage Act 1972 (WA)</i>
1211:MB8.2.2	Aboriginal Cultural Heritage	The proponent must implement the proposal to meet the following environmental objectives: avoid, where possible, and otherwise minimise indirect impacts to Aboriginal Cultural Heritage within and surrounding the development envelope; (a) visual and amenity impacts to social and cultural places and activities; and	Implement Cultural Heritage Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	To date, no indirect impacts to Aboriginal Cultural Heritage have been identified during implementation of the Project.
1211:MB8.2.3	Aboriginal Cultural Heritage	The proponent must implement the proposal to meet the following environmental objectives: ongoing consultation and engagement with Traditional Owners about achievement of the outcomes in condition B8-1 and objectives in condition B8-2 for the life of the proposal.	Implement Cultural Heritage Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	Consultation and engagement with Traditional Owners are ongoing.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB8.3	Aboriginal Cultural Heritage	The proponent must, in consultation with DWER, and in collaboration with the Yaburara and Mardudhunera People, and Robe River Kuruma People prepare an environmental management plan that demonstrates how achievement of the Aboriginal Cultural Heritage environmental outcomes in condition B8-1 will be monitored and substantiated, how the Aboriginal Cultural Heritage objectives in condition B8-2 will be achieved, and satisfies the requirements of conditions C4 and C5, and submit it to the CEO.	Implement Cultural Heritage Management Plan.	Monitoring results provided in annual CAR.	Overall	Ongoing	Completed	The Aboriginal Cultural Heritage Management Plan (Revision 3) was approved on 23 August 2024, prior to ground disturbing activities associated with the significant amendment.
1211:MB9.1.1	Pilbara Environmental Offset Fund	The proponent must contribute funds to the Pilbara Environmental Offsets Fund calculated pursuant to condition B9-2, to achieve the objective of counterbalancing the significant residual impacts to: 'Good' to 'Excellent' condition native vegetation;	Implement the Mardie Project Impact Reconciliation Procedure	Evidence of transfer	Overall	Biennially	Compliant	The Impact Reconciliation Procedure was approved by DWER on 22 August 2024 and has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.1.2	Pilbara Environmental Offset Fund	The proponent must contribute funds to the Pilbara Environmental Offsets Fund calculated pursuant to condition B9-2, to achieve the objective of counterbalancing the significant residual impacts to: Priority 3 PEC - Horseflat Land System of the Roebourne Plains;	Implement the Mardie Project Impact Reconciliation Procedure	Evidence of transfer	Overall	Biennially	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.1.3	Pilbara Environmental Offset Fund	The proponent must contribute funds to the Pilbara Environmental Offsets Fund calculated pursuant to condition B9-2, to achieve the objective of counterbalancing the significant residual impacts to: critical habitat for the Pilbara olive python (<i>Liasis olivaceus barroni</i>) riparian and freshwater pool habitat; and	Implement the Mardie Project Impact Reconciliation Procedure	Evidence of transfer	Overall	Biennially	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.1.4	Pilbara Environmental Offset Fund	The proponent must contribute funds to the Pilbara Environmental Offsets Fund calculated pursuant to condition B9-2, to achieve the objective of counterbalancing the significant residual impacts to: supporting habitat for northern quoll (<i>Dasyurus hallucatus</i>), grey falcon (<i>Falco hypoleucos</i>), northern coastal freetail bat (<i>Ozimops cobourgianus</i>), Pilbara leaf-nosed bat (<i>Macroderma gigas</i>).	Implement the Mardie Project Impact Reconciliation Procedure	Evidence of transfer	Overall	Biennially	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.2	Pilbara Environmental Offset Fund	The proponent's contribution to the Pilbara Environmental Offsets Fund must be paid biennially, with the amount to be contributed calculated based on the clearing undertaken in each year of the biennial reporting period in accordance with the rates in condition B9-3. The first biennial reporting period must commence from ground disturbing activities of the environmental value(s) identified in condition B9-3.	Implement the Mardie Project Impact Reconciliation Procedure	Evidence of transfer	Overall	Biennially	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.3.1	Pilbara Environmental Offset Fund	Calculated on the 2021–2022 financial year, the contribution rates are: \$841 AUD (excluding GST) per hectare of 'Good' to 'Excellent' condition native vegetation cleared as a result of the proposal within the Chichester IBRA subregion;	Implement the Mardie Project Impact Reconciliation Procedure	Evidence of transfer	Overall	Biennially	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.3.2	Pilbara Environmental Offset Fund	Calculated on the 2021–2022 financial year, the contribution rates are: \$890 AUD (excluding GST) per hectare of 'Good' to 'Excellent' condition native vegetation cleared as a result of the proposal within the Roebourne IBRA subregion	Implement the Mardie Project Impact Reconciliation Procedure	Evidence of transfer	Overall	Biennially	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB9.3.3	Pilbara Environmental Offset Fund	Calculated on the 2021–2022 financial year, the contribution rates are: \$1,753 AUD (excluding GST) per hectare of Priority 3 PEC - Horseflat Land System of the Roebourne Plains cleared or indirectly impacted for the proposal within the Roebourne IBRA subregion;	Implement the Mardie Project Impact Reconciliation Procedure	Evidence of transfer	Overall	Biennially	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.3.4	Pilbara Environmental Offset Fund	Calculated on the 2021–2022 financial year, the contribution rates are: \$1780 (excluding GST) per hectare of the following values cleared as a result of the proposal: (a) Pilbara olive python (<i>Liasis olivaceus barroni</i>) critical habitat	Implement the Mardie Project Impact Reconciliation Procedure	Evidence of transfer	Overall	Biennially	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.3.5	Pilbara Environmental Offset Fund	Calculated on the 2021–2022 financial year, the contribution rates are: \$890 AUD per hectare of the following values cleared as a result of the proposal: (a) Pilbara leaf-nosed bat (<i>Macroderma gigas</i>) supporting habitat; (b) northern quoll (<i>Dasyurus hallucatus</i>) supporting habitat; (c) grey falcon (<i>Falco hypoleucos</i>) supporting habitat; and (d) northern coastal freetail bat (<i>Ozimops cobourgianus</i>) supporting habitat.	Implement the Mardie Project Impact Reconciliation Procedure	Evidence of transfer	Overall	Biennially	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.4	Pilbara Environmental Offset Fund	The rates in condition B9-3 change annually each subsequent financial year in accordance with the percentage change in the CPI applicable to that financial year.	Implement the Mardie Project Impact Reconciliation Procedure	Rate change calculation	Overall	Biennially	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.5	Pilbara Environmental Offset Fund	Where offsets are required for an area of land under condition B10 that is also subject to offsets under condition B9-3, the higher amount shall apply.	Implement the Mardie Project Impact Reconciliation Procedure	Evidence of transfer	Overall	Biennially	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.6.1	Pilbara Environmental Offset Fund	To achieve the objective in condition B9-1, the proponent must implement the Mardie Project Impact reconciliation Procedure (Rev 1, 29 August 2022). This procedure must: spatially define the environmental value(s) identified in condition B9-1	Implement the Mardie Project Impact Reconciliation Procedure	Impact Reconciliation Procedure	Overall	Ongoing	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.6.2	Pilbara Environmental Offset Fund	To achieve the objective in condition B9-1, the proponent must implement the Mardie Project Impact reconciliation Procedure (Rev 1, 29 August 2022). This procedure must: spatially define the areas where offsets required by condition B9-1 are to be exempt;	Implement the Mardie Project Impact Reconciliation Procedure	Impact Reconciliation Procedure	Overall	Ongoing	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.6.3	Pilbara Environmental Offset Fund	To achieve the objective in condition B9-1, the proponent must implement the Mardie Project Impact reconciliation Procedure (Rev 1, 29 August 2022). This procedure must: include a methodology to calculate the amount of clearing undertaken during each year of the biennial reporting period for each of the environmental values identified in condition B9-3;	Implement the Mardie Project Impact Reconciliation Procedure	Impact Reconciliation Procedure	Overall	Ongoing	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB9.6.4	Pilbara Environmental Offset Fund	To achieve the objective in condition B9-1, the proponent must implement the Mardie Project Impact Reconciliation Procedure (Rev 1, 29 August 2022). This procedure must: state that clearing calculation for the first biennial reporting period will commence from ground disturbing activities in accordance with condition B9-2 and end on the second 30 June following commencement of ground disturbing activities;	Implement the Mardie Project Impact Reconciliation Procedure	Impact Reconciliation Procedure	Overall	Ongoing	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.6.5	Pilbara Environmental Offset Fund	To achieve the objective in condition B9-1, the proponent must implement the Mardie Project Impact Reconciliation Procedure (Rev 1, 29 August 2022). This procedure must: state that clearing calculations for each subsequent biennial reporting period will commence on 1 July of the required reporting period, unless otherwise agreed by the CEO;	Implement the Mardie Project Impact Reconciliation Procedure	Impact Reconciliation Procedure	Overall	Ongoing	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.6.6	Pilbara Environmental Offset Fund	To achieve the objective in condition B9-1, the proponent must implement the Mardie Project Impact Reconciliation Procedure (Rev 1, 29 August 2022). This procedure must: indicate the timing and content of the Impact Reconciliation Reports; and	Implement the Mardie Project Impact Reconciliation Procedure	Impact Reconciliation Procedure	Overall	Ongoing	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.6.7	Pilbara Environmental Offset Fund	To achieve the objective in condition B9-1, the proponent must implement the Mardie Project Impact Reconciliation Procedure (Rev 1, 29 August 2022). This procedure must: be prepared in accordance with Instructions on how to prepare Environmental Protection Act 1986 Part IV Impact Reconciliation Procedures and Impact Reconciliation Reports (or any subsequent revisions).	Implement the Mardie Project Impact Reconciliation Procedure	Impact Reconciliation Procedure	Overall	Ongoing	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.7	Pilbara Environmental Offset Fund	The proponent must submit an Impact Reconciliation Report in accordance with the confirmed Impact Reconciliation Procedure in condition B9-6.	Implement the Mardie Project Impact Reconciliation Procedure	Impact Reconciliation Report	Overall	Biennially - 30 September	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report. The next report is due by 30 September 2025.
1211:MB9.8	Pilbara Environmental Offset Fund	The Impact Reconciliation Report required pursuant to condition B9-7 must provide the location and spatial extent of the clearing undertaken as a result of the proposal during each year of each biennial reporting period.	Implement the Mardie Project Impact Reconciliation Procedure	Impact Reconciliation Report	Overall	Ongoing	Compliant	The Impact Reconciliation Procedure has been implemented. The first Impact Reconciliation Report has been submitted to DWER and was being assessed at the time of this report.
1211:MB9.9.1	Pilbara Environmental Offset Fund	The proponent may apply in writing and seek the written approval of the CEO to reduce all or part of the contribution payable under condition B9-3 where: a payment has been made to satisfy a condition of an approval under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> in relation to the proposal; and	Written request to the CEO.	Written request	Overall	As required	Not Required	No request has been made.
1211:MB9.9.2	Pilbara Environmental Offset Fund	The proponent may apply in writing and seek the written approval of the CEO to reduce all or part of the contribution payable under condition B9-3 where: the payment is made for the purpose of counterbalancing impacts of the proposal on matters of national environmental significance.	Written request to the CEO.	Written request	Overall	As required	Not Required	No request has been made.
1211:MB9.10	Pilbara Environmental Offset Fund	The CEO may grant approval to discount the amount payable under condition B9-1 (2), condition B9-1(3) and condition B9-1 (4) if the CEO is satisfied that the payment will offset the significant residual impacts of the proposal.	Written request to the CEO.	Written request	Overall	As required	Not Required	No request has been made.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB9.11	Pilbara Environmental Offset Fund	Condition C2 applies to the confirmed Impact Reconciliation Procedure required by condition B9-6 as if it were an environmental management plan.	Implement the Mardie Project Impact Reconciliation Procedure	Impact Reconciliation Procedure	Overall	Ongoing	Compliant	
1211:MB9.12	Pilbara Environmental Offset Fund	Failure to implement a confirmed Impact Reconciliation Procedure or submit an Impact Reconciliation Report as required by condition B9-7 represents a non-compliance with these conditions.	Implement the Mardie Project Impact Reconciliation Procedure	Impact Reconciliation Procedure	Overall	Ongoing	Compliant	
1211:MB10.1.1	Intertidal and Subtidal Research Offsets	Given the significant residual impacts and risks of the proposal to mangroves, algal mat, and coastal samphire, and the potential for indirect impacts to subtidal habitats, the proponent shall undertake the following offset measures for the purpose of guiding the strategic protection and management of the ecological values of these habitats on the west Pilbara coast, which include migratory bird habitat and ecological maintenance of marine fauna habitat, consistent with the financial, governance and accountability arrangements described in schedule 2: contribution to the Mardie Project Marine Intertidal Research Offset Program, on the basis described in schedule 2 (Project A) which has the purpose of mapping the original and current extent of coastal samphire and Algal mat on the west Pilbara coast;	Implement and contribute to the Marine Intertidal Research Offset Program.	Evidence of transfer	Overall	Annually	Compliant	
1211:MB10.1.2	Intertidal and Subtidal Research Offsets	Given the significant residual impacts and risks of the proposal to mangroves, algal mat, and coastal samphire, and the potential for indirect impacts to subtidal habitats, the proponent shall undertake the following offset measures for the purpose of guiding the strategic protection and management of the ecological values of these habitats on the west Pilbara coast, which include migratory bird habitat and ecological maintenance of marine fauna habitat, consistent with the financial, governance and accountability arrangements described in schedule 2: contribution to a relevant scientific initiative, on the basis described in schedule 2 (Project B), which has the aim of identifying and quantifying the potential effects of sea level rise on the values of mangroves, coastal samphire, and Algal mat on the west Pilbara coast, and identifying the significance of salt projects in preventing the adaptation of intertidal Benthic Communities and Habitat to sea-level rise;	Implement and contribute to the Marine Intertidal Research Offset Program.	Evidence of transfer	Overall	Annually	Compliant	
1211:MB10.1.3	Intertidal and Subtidal Research Offsets	Given the significant residual impacts and risks of the proposal to mangroves, algal mat, and coastal samphire, and the potential for indirect impacts to subtidal habitats, the proponent shall undertake the following offset measures for the purpose of guiding the strategic protection and management of the ecological values of these habitats on the west Pilbara coast, which include migratory bird habitat and ecological maintenance of marine fauna habitat, consistent with the financial, governance and accountability arrangements described in schedule 2: contribution to a relevant scientific initiative, on the basis described in schedule 2 (Project C(i)), for the purposes of funding research with the aim of identifying the ecological roles, values and functions of intertidal benthic communities and habitat;	Implement and contribute to the Marine Intertidal Research Offset Program.	Evidence of transfer	Overall	Annually	Compliant	

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB10.1.4	Intertidal and Subtidal Research Offsets	Given the significant residual impacts and risks of the proposal to mangroves, algal mat, and coastal samphire, and the potential for indirect impacts to subtidal habitats, the proponent shall undertake the following offset measures for the purpose of guiding the strategic protection and management of the ecological values of these habitats on the west Pilbara coast, which include migratory bird habitat and ecological maintenance of marine fauna habitat, consistent with the financial, governance and accountability arrangements described in schedule 2: maintenance of relevant scientific initiative, on the basis described in schedule 2 (Project C (ii)) for the purposes of funding research with the aim of identifying the ecological roles, values and functions of intertidal Benthic Communities and Habitat, to be paid in the event that loss of intertidal Benthic Communities and Habitat, or loss of health, percent cover or diversity of intertidal Benthic Communities and Habitat is identified by the BCHMMP environmental management plan required by condition B1-4;	Implement and contribute to the Marine Intertidal Research Offset Program.	Evidence of transfer	Overall	Annually	Compliant	
1211:MB10.1.5	Intertidal and Subtidal Research Offsets	Given the significant residual impacts and risks of the proposal to mangroves, algal mat, and coastal samphire, and the potential for indirect impacts to subtidal habitats, the proponent shall undertake the following offset measures for the purpose of guiding the strategic protection and management of the ecological values of these habitats on the west Pilbara coast, which include migratory bird habitat and ecological maintenance of marine fauna habitat, consistent with the financial, governance and accountability arrangements described in schedule 2: maintenance of a contingency fund, on the basis described in schedule 2 (Project D) for the purposes of funding research with the aim of identifying the potential impacts to bluespotted emperor (<i>Lethrinus punctulatus</i>), to be paid in the event that loss of intertidal and subtidal benthic communities and habitat, or loss of health, percent cover or diversity of intertidal and subtidal benthic habitat and communities is identified by the BCHMMP environmental management plan required by condition B1; and	Implement and contribute to the Marine Intertidal Research Offset Program.	Evidence of transfer	Overall	Annually	Compliant	
1211:MB10.1.6	Intertidal and Subtidal Research Offsets	Given the significant residual impacts and risks of the proposal to mangroves, algal mat, and coastal samphire, and the potential for indirect impacts to subtidal habitats, the proponent shall undertake the following offset measures for the purpose of guiding the strategic protection and management of the ecological values of these habitats on the west Pilbara coast, which include migratory bird habitat and ecological maintenance of marine fauna habitat, consistent with the financial, governance and accountability arrangements described in schedule 2: contribution to a relevant scientific initiative, on the basis described in schedule 2 (Project C (iii)) for the purposes of funding research with the aim of identifying the ecological roles, values and functions of intertidal benthic habitat, to be paid in the event that disturbance to mangrove habitat in the RRDMMMA occurs subject to the requirements of condition B1-2.	Implement and contribute to the Marine Intertidal Research Offset Program.	Evidence of transfer	Overall	Annually	Not Required	No disturbance to mangrove habitat within the RRDMMMA has occurred.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MB10.2	Intertidal and Subtidal Research Offsets	The proponent shall ensure that the real funding for Projects A, B, C and D will be maintained through indexation to the Perth consumer price index (CPI) with the first indexation occurring on 30 June 2021.	Implement and contribute to the Marine Intertidal Research Offset Program.	Evidence of transfer	Overall	Annually	Compliant	
1211:MB10.3.4	Intertidal and Subtidal Research Offsets	The proponent shall select a third party to carry out the work required to meet the outcomes of condition B10-1 to the satisfaction of the CEO, on advice of DPIRD and DBCA. In applying to the CEO for endorsement of the selected third parties, the proponent shall provide: demonstration of the track record, experience, qualifications and competencies of the proposed third party to carry out the work and achieve the outcomes in the intertidal and marine environment.	Implement the Marine Intertidal Research Offsets Program.	Marine Intertidal Research Offsets Program	Overall	Ongoing	Compliant	DWER approved the appointment of WAMSI as the third party to conduct the work required.
1211:MB10.4.4	Intertidal and Subtidal Research Offsets	The proponent shall ensure that the financial arrangements described in schedule 2 and under condition B10-2 are maintained to achieve the outcomes of Projects A, B, C and D to the extent that: funding between projects is transferred as agreed by the CEO;	Implement the Marine Intertidal Research Offsets Program.	Marine Intertidal Research Offsets Program	Overall	Ongoing	Compliant	
1211:MB10.4.5	Intertidal and Subtidal Research Offsets	The proponent shall ensure that the financial arrangements described in schedule 2 and under condition B10-2 are maintained to achieve the outcomes of Projects A, B, C and D to the extent that: additional funds up to a maximum of ten (10) per cent are contributed to complete project outcomes;	Implement the Marine Intertidal Research Offsets Program.	Marine Intertidal Research Offsets Program	Overall	Ongoing	Not Required	Additional funds have not been required.
1211:MB10.4.6	Intertidal and Subtidal Research Offsets	The proponent shall ensure that the financial arrangements described in schedule 2 and under condition B10-2 are maintained to achieve the outcomes of Projects A, B, C and D to the extent that: provide the objectives, timing (deliver outcomes within three (3) years of issue of Ministerial Statement or as otherwise agreed with the CEO), milestones and methodology of the proposed research and management programs to meet the outcomes in condition B10-1;	Implement the Marine Intertidal Research Offsets Program.	Marine Intertidal Research Offsets Program	Overall	Ongoing	Compliant	
1211:MB10.4.7	Intertidal and Subtidal Research Offsets	The proponent shall ensure that the financial arrangements described in schedule 2 and under condition B10-2 are maintained to achieve the outcomes of Projects A, B, C and D to the extent that: prior to the commencement of ground disturbing activities, unless otherwise agreed by the CEO, the proponent shall prepare and submit to the CEO a Summary Offset Plan, on advice of DPIRD and DBCA, that provides the design for the proposed research and management programs and completion criteria for each project to meet the outcomes of condition B10-1;	Implement the Marine Intertidal Research Offsets Program.	Marine Intertidal Research Offsets Program	Overall	Ongoing	Completed	The Summary Offsets Plan was submitted in August 2022 after approval from the CEO to submit after ground disturbing activities.
1211:MB10.4.8	Intertidal and Subtidal Research Offsets	The proponent shall ensure that the financial arrangements described in schedule 2 and under condition B10-2 are maintained to achieve the outcomes of Projects A, B, C and D to the extent that: set out that the Summary Offset Plan will be made available publicly, within a reasonable time period in a manner agreed by the CEO; and	Implement the Marine Intertidal Research Offsets Program.	Marine Intertidal Research Offsets Program	Overall	Ongoing	Compliant	The Summary Offset Plan is available via the BCI website.
1211:MB10.4.9	Intertidal and Subtidal Research Offsets	The proponent shall ensure that the financial arrangements described in schedule 2 and under condition B10-2 are maintained to achieve the outcomes of Projects A, B, C and D to the extent that: identify how outcomes of the proposed programs will be made available publicly.	Implement the Marine Intertidal Research Offsets Program.	Marine Intertidal Research Offsets Program	Overall	Ongoing	Compliant	

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MC1.1.1	Environmental Management Plans: Conditions related to Commencement of Implementation of the Proposal	The proponent must not undertake: dredging activities until the CEO has confirmed in writing that the environmental management plan required by condition B1-4 and condition B5-4 meets the requirements of that condition and condition C4;	Submit Dredge Management Plan and Benthic Communities and Habitat Monitoring and Management Plan	Dredge Management Plan Benthic Communities and Habitat Monitoring and Management Plan	Overall	Prior to dredging activities	Not Required	Dredge activities are yet to commence.
1211:MC1.1.2	Environmental Management Plans: Conditions related to Commencement of Implementation of the Proposal	The proponent must not undertake: dredging activities, marine construction or operations associated with the Mardie Project until the CEO has confirmed in writing that the environmental management plan required by condition B5-3 meet the requirements of that condition and condition C4;	Submit Illumination Plan and Marine Turtle Monitoring Program	Illumination Plan Marine Turtle Monitoring Program	Overall	Prior to dredging activities, marine construction or operations	Compliant	No dredging activities or new marine construction activities were undertaken during the reporting period.
1211:MC1.1.3	Environmental Management Plans: Conditions related to Commencement of Implementation of the Proposal	The proponent must not undertake: transfer of seawater, brine and/or waste product associated with the Mardie Project until the CEO has confirmed in writing that the environmental management plan required by condition B3-2 has been updated in accordance with condition B3-3 and meets the requirements of condition C4;	Submit Groundwater Monitoring and Management Plan	Groundwater Monitoring and Management Plan	Overall	Prior to transfer of seawater	Non-compliant	As notified on 4 January 2024, an incident occurred on 28 December 2023 which saw the accidental release of seawater to Pond 1. GMMP updated to Revision K which was approved by DWER on 3 April 2024. GMMP was updated to Revision M prior to transfer of seawater for operational purposes.
1211:MC1.1.4	Environmental Management Plans: Conditions related to Commencement of Implementation of the Proposal	The proponent must not undertake: ground disturbing activities associated with the significant amendment of the Mardie Project until the CEO has confirmed in writing that the environmental management plan required by condition B6-4 has been updated in accordance with C4:	Submit Migratory Shorebird Monitoring and Management Plan	Migratory Shorebird Monitoring and Management Plan	Overall	Prior to ground disturbing activities for OMP	Completed	Revision 3 of the plan was submitted to DWER on 18 August 2024 and approved on 10 September 2024, prior to ground disturbing activities for the significant amendment.
1211:MC1.1.5	Environmental Management Plans: Conditions related to Commencement of Implementation of the Proposal	The proponent must not undertake: marine construction or operations associated with the Mardie Project until the CEO has confirmed in writing that the environmental management plan required by condition B2-2 meets the requirements of that condition and condition C4:	Submit Marine Pest Management Procedure	Marine Pest Management Procedure	Overall	Prior to marine construction or operations	Compliant	No new marine construction activities commenced during the reporting period.
1211:MC1.1.6	Environmental Management Plans: Conditions related to Commencement of Implementation of the Proposal	The proponent must not undertake: ground disturbing activities associated with the Mardie Project within the RRDMMMA until the CEO has confirmed in writing that the RRDMMMA revised design required by condition B3-4 and the environmental management plan required by condition B1-4(1) meets the requirements of that condition and condition C4;	Submit Benthic Communities and Habitat Monitoring and Management Plan	Benthic Communities and Habitat Monitoring and Management Plan	Overall	Prior to ground disturbing activities within the RRDMMMA.	Not Required	No ground disturbing activities are planned within the RRDMMMA.
1211:MC1.1.7	Environmental Management Plans: Conditions related to Commencement of Implementation of the Proposal	The proponent must not undertake: ground disturbing activities associated with the significant amendment of the Mardie Project until the CEO has confirmed in writing that the Impact Reconciliation Procedure required by condition B9-6 meets the requirements of that condition :	Submit Impact Reconciliation Procedure	Impact Reconciliation Procedure	Overall	Prior to ground disturbing activities for OMP	Completed	The Impact Reconciliation Procedure was approved on 22 August 2024, prior to ground disturbing activities associated with the significant amendment.
1211:MC1.1.8	Environmental Management Plans: Conditions related to Commencement of Implementation of the Proposal	The proponent must not undertake: ground disturbing activities associated with the significant amendment of the Mardie Project until the CEO has confirmed in writing that the environmental management plan required by Condition B8-3 meets the requirements of that condition and condition C5: and	Submit Cultural Heritage Management Plan	Cultural Heritage Management Plan	Overall	Prior to ground disturbing activities for OMP	Completed	The Aboriginal Cultural Heritage Management Plan (Revision 3) was approved on 23 August 2024, prior to ground disturbing activities associated with the significant amendment.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MC1.1.9	Environmental Management Plans: Conditions related to Commencement of Implementation of the Proposal	The proponent must not undertake: brine discharge to the marine environment associated with the Mardie Project until the CEO has confirmed in writing that the baseline data collection outlined in the environmental management plans required by condition B1-4 and B4-3 has been completed.	Submit Benthic Communities and Habitat Monitoring and Management Plan and Marine Environmental Quality Monitoring and Management Plan	Benthic Communities and Habitat Monitoring and Management Plan Marine Environmental Quality Monitoring and Management Plan	Overall	Prior to brine discharge	Not Required	No brine discharge has occurred to date.
1211:MC2.1.1	Environmental Management Plans: Conditions related to Approval, Implementation, Review and Publication	Upon being required to implement an environmental management plan under Part B, or after receiving notice in writing from the CEO under condition C1-1 that the environmental management plan(s) required in Part B satisfies the relevant requirements, the proponent must: implement the most recent version of the confirmed environmental management plan; and	Implement management plan	Annual Reporting	Overall	Ongoing	Compliant	All approved management plans have been implemented.
1211:MC2.1.2	Environmental Management Plans: Conditions related to Approval, Implementation, Review and Publication	Upon being required to implement an environmental management plan under Part B, or after receiving notice in writing from the CEO under condition C1-1 that the environmental management plan(s) required in Part B satisfies the relevant requirements, the proponent must: continue to implement the confirmed environmental management plan referred to in condition C2-1(1) other than for any period which the CEO confirms by notice in writing that it has been demonstrated that the relevant requirements for the environmental management plan have been met, or are able to be met under another statutory decision-making process, in which case the implementation of the environmental management plan is no longer required for that period.	Implement management plan	Annual Reporting	Overall	Ongoing	Compliant	All approved management plans have been implemented and continue to be implemented.
1211:MC2.2.1	Environmental Management Plans: Conditions related to Approval, Implementation, Review and Publication	The proponent: may review and revise a confirmed environmental management plan provided it meets the relevant requirements of that environmental management plan, including any consultation that may be required when preparing the environmental management plan;	Review management plan	Management plan	Overall	As required	Compliant	The Illumination Plan was revised on 1 May 2024 and provided to DWER on 3 May 2024.
1211:MC2.2.2	Environmental Management Plans: Conditions related to Approval, Implementation, Review and Publication	The proponent: must review and revise a confirmed environmental management plan and ensure it meets the relevant requirements of that environmental management plan, including any consultation that may be required when preparing the environmental management plan, as and when directed by the CEO: and	Review management plan	Management plan	Overall	As required	Not Required	
1211:MC2.2.3	Environmental Management Plans: Conditions related to Approval, Implementation, Review and Publication	The proponent: must revise and submit to the CEO the confirmed environmental management plan if there is a material risk that the outcomes or objectives it is required to achieve will not be complied with, including but not limited to as a result of a change to the proposal.	Review management plan	Management plan	Overall	As required	Not Required	

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MC2.3	Environmental Management Plans: Conditions related to Approval, Implementation, Review and Publication	Despite condition C2-1, but subject to conditions C2-4 and C2-5, the proponent may implement minor revisions to an environmental management plan if the revisions will not result in new or increased adverse impacts to the environment or result in a risk to the achievement of the limits, outcomes or objectives which the environmental management plan is required to achieve.	Review management plan	Management plan	Overall	As required	Compliant	The Illumination Plan was revised on 1 May 2024 and provided to DWER on 3 May 2024.
1211:MC2.4.1	Environmental Management Plans: Conditions related to Approval, Implementation, Review and Publication	If the proponent is to implement minor revisions to an environmental management plan under condition C2-3, the proponent must provide the CEO with the following at least twenty (20) business days before it implements the revisions: the revised environmental management plan clearly showing the minor revisions;	Review management plan	Management plan	Overall	As required	Compliant	The Illumination Plan was revised on 1 May 2024 and provided to DWER on 3 May 2024.
1211:MC2.4.2	Environmental Management Plans: Conditions related to Approval, Implementation, Review and Publication	If the proponent is to implement minor revisions to an environmental management plan under condition C2-3, the proponent must provide the CEO with the following at least twenty (20) business days before it implements the revisions: an explanation of and justification for the minor revisions; and	Review management plan	Management plan	Overall	As required	Not Required	
1211:MC2.4.3	Environmental Management Plans: Conditions related to Approval, Implementation, Review and Publication	If the proponent is to implement minor revisions to an environmental management plan under condition C2-3, the proponent must provide the CEO with the following at least twenty (20) business days before it implements the revisions: an explanation of why the minor revisions will not result in new or increased adverse impacts to the environment or result in a risk to the achievement of the limits, outcomes or objectives which the environmental management plan is required to achieve.	Review management plan	Management plan	Overall	As required	Compliant	The Illumination Plan was revised on 1 May 2024 and provided to DWER on 3 May 2024.
1211:MC2.5	Environmental Management Plans: Conditions related to Approval, Implementation, Review and Publication	The proponent must cease to implement any revisions which the CEO notifies the proponent (at any time) in writing may not be implemented.	Cease to implement changes	Management plan	Overall	As required	Not Required	
1211:MC2.6	Environmental Management Plans: Conditions related to Approval, Implementation, Review and Publication	Confirmed environmental management plans, and any revised environmental management plans under condition C2-4(1), must be published on the proponent's website and provided to the CEO in electronic form suitable for on-line publication by the DWER within twenty (20) business days of being implemented, or being required to be implemented (whichever is earlier).	Publish management plans	Website	Overall	Ongoing	Compliant	All environmental management plans have been published to the BCI website.
1211:MC3.1.1	Conditions Related to Monitoring	The proponent must undertake monitoring capable of: substantiating whether the proposal limitations and extents in Part A are exceeded; and	Implement BCI Ground Disturbance Permit (GDP) process including collection of spatial disturbance data to maintain compliance with clearing limits.	GIS reporting tool used to track disturbance – refer to evidence folder:	Overall	Ongoing	Compliant	All ground disturbance activities undertaken during the reporting period were subject to approval of ground disturbance permits, and the monitoring and reporting of actual clearing completed.
1211:MC3.1.2	Conditions Related to Monitoring	The proponent must undertake monitoring capable of: detecting and substantiating whether the environmental outcomes identified in Part B are achieved (excluding any environmental outcomes in Part B where an environmental management plan is expressly required to monitor achievement of that outcome).	Environmental monitoring	Monitoring results provided in annual CAR.	Overall	Ongoing	Compliant	

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MC3.2.1	Conditions Related to Monitoring	The proponent must submit as part of the Compliance Assessment Report required by condition D2, a compliance monitoring report that: outlines the monitoring that was undertaken during the implementation of the proposal;	Environmental monitoring	Monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MC3.2.2	Conditions Related to Monitoring	The proponent must submit as part of the Compliance Assessment Report required by condition D2, a compliance monitoring report that: identifies why the monitoring was capable of substantiating whether the proposal limitation and extents in Part A are exceeded;	Environmental monitoring and analysis	Analysis of monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MC3.2.3	Conditions Related to Monitoring	The proponent must submit as part of the Compliance Assessment Report required by condition D2, a compliance monitoring report that: for any environmental outcomes to which condition C3-1(2) applies, identifies why the monitoring was scientifically robust and capable of detecting whether the environmental outcomes in Part B are met;	Environmental monitoring and analysis	Analysis of monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MC3.2.4	Conditions Related to Monitoring	The proponent must submit as part of the Compliance Assessment Report required by condition D2, a compliance monitoring report that: outlines the results of the monitoring;	Environmental monitoring and analysis	Analysis of monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MC3.2.5	Conditions Related to Monitoring	The proponent must submit as part of the Compliance Assessment Report required by condition D2, a compliance monitoring report that: reports whether the proposal limitations and extents in Part A were exceeded and (for any environmental outcomes to which condition C3-1 (2) applies) whether the environmental outcomes in Part B were achieved, based on analysis of the results of the monitoring; and	Environmental monitoring and analysis	Analysis of monitoring results provided in annual CAR.	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MC3.2.6	Conditions Related to Monitoring	The proponent must submit as part of the Compliance Assessment Report required by condition D2, a compliance monitoring report that: reports any actions taken by the proponent to remediate any potential non-compliance.	Incident investigation into non-compliances	Results provided in the CAR	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MC3.3	Conditions Related to Monitoring	details of reporting requirements in the event that any changes to individuals and populations of Minnie Daisy (Minuria tridens) are detected, including requirements to provide mitigation measures to protect this species.	M. tridens report	Results provided in the CAR	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MC4.1.1	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plans required under condition B1-4, condition B2-2, condition B3-2, condition B4-3, condition B5-3, condition B5-4, condition B6-4, condition B6-6 and condition B8-3 must contain provisions which enable the substantiation of whether the relevant outcomes of those conditions are met, and must include: threshold criteria that provide a limit beyond which the environmental outcomes are not achieved;	Management plans to include threshold criteria	Management plans	Overall	Ongoing	Compliant	
1211:MC4.1.2	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plans required under condition B1-4, condition B2-2, condition B3-2, condition B4-3, condition B5-3, condition B5-4, condition B6-4, condition B6-6 and condition B8-3 must contain provisions which enable the substantiation of whether the relevant outcomes of those conditions are met, and must include: trigger criteria that will provide an early warning that the environmental outcomes are not likely to be met;	Management plans to include trigger criteria	Management plans	Overall	Ongoing	Compliant	

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MC4.1.3	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plans required under condition B1-4, condition B2-2, condition B3-2, condition B4-3, condition B5-3, condition B5-4, condition B6-4, condition B6-6 and condition B8-3 must contain provisions which enable the substantiation of whether the relevant outcomes of those conditions are met, and must include: monitoring parameters, sites, control/reference sites, methodology, timing and frequencies which will be used to measure threshold criteria and trigger criteria. Include methodology for determining alternative monitoring sites as a contingency if proposed sites are not suitable in the future;	Management plans to required parameters	Management plans	Overall	Ongoing	Compliant	
1211:MC4.1.4	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plans required under condition B1-4, condition B2-2, condition B3-2, condition B4-3, condition B5-3, condition B5-4, condition B6-4, condition B6-6 and condition B8-3 must contain provisions which enable the substantiation of whether the relevant outcomes of those conditions are met, and must include: baseline data;	Management plans to include baseline data	Management plans	Overall	Ongoing	Compliant	
1211:MC4.1.5	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plans required under condition B1-4, condition B2-2, condition B3-2, condition B4-3, condition B5-3, condition B5-4, condition B6-4, condition B6-6 and condition B8-3 must contain provisions which enable the substantiation of whether the relevant outcomes of those conditions are met, and must include: data collection and analysis methodologies;	Management plans to include methodologies	Management plans	Overall	Ongoing	Compliant	
1211:MC4.1.6	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plans required under condition B1-4, condition B2-2, condition B3-2, condition B4-3, condition B5-3, condition B5-4, condition B6-4, condition B6-6 and condition B8-3 must contain provisions which enable the substantiation of whether the relevant outcomes of those conditions are met, and must include: adaptive management methodology;	Management plans to include adaptive management methodologies	Management plans	Overall	Ongoing	Compliant	
1211:MC4.1.7	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plans required under condition B1-4, condition B2-2, condition B3-2, condition B4-3, condition B5-3, condition B5-4, condition B6-4, condition B6-6 and condition B8-3 must contain provisions which enable the substantiation of whether the relevant outcomes of those conditions are met, and must include: contingency measures which will be implemented if threshold criteria or trigger criteria are met; and	Management plans to include contingencies measures	Management plans	Overall	Ongoing	Compliant	
1211:MC4.1.8	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plans required under condition B1-4, condition B2-2, condition B3-2, condition B4-3, condition B5-3, condition B5-4, condition B6-4, condition B6-6 and condition B8-3 must contain provisions which enable the substantiation of whether the relevant outcomes of those conditions are met, and must include: reporting requirements.	Management plans to include reporting requirements	Management plans	Overall	Ongoing	Compliant	
1211:MC4.2.1	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B5-3 is also required to: be updated to include management actions, management targets and contingency measures that will establish whether the proposal is having a detectable difference on marine turtle orientation (i.e. misorientation or disorientation), and nesting beach utilisation as described in condition B5-1(2).	Management plans to include contingencies measures	Management plans	Overall	Ongoing	Compliant	

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MC4.2.2	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B5-3 is also required to: include a commitment to annually compare cumulative results against the baseline assessment (Pendoley Environmental 2019, Mardie Salt Project Marine Turtle Monitoring Program 2018/2019. Rev 0, Report No. RP-59001);	Management plans to include comparison against baseline results	Management plans	Overall	Ongoing	Compliant	
1211:MC4.2.3	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B5-3 is also required to: Include a monitoring plan that is in accordance with the recommendations published in the National Light Pollution Guidelines (2020);	Management plans to include monitoring plan	Management plans	Overall	Ongoing	Compliant	
1211:MC4.2.4	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B5-3 is also required to: provide criteria for when the Mardie Illumination Plan required by condition B6-5 will be revised in response to outcomes of the monitoring required by condition B5-3; and	Management plans to include criteria for revision of plan	Management plans	Overall	Ongoing	Compliant	
1211:MC4.2.5	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B5-3 is also required to: Continue to be implemented until the CEO has confirmed by notice in writing, on advice from DBCA and DWER, that the outcome of condition B5-1(1-3) has been, and will continue to be met.	Implement management plan	Results provided in the CAR	Overall	Ongoing	Compliant	
1211:MC4.3.1	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B6-4 is also required to: be conducted at the ponds and in proximity to the trestle jetty (impact areas) and in representative habitats in control areas, as per the requirements of the EPBC Act Policy Statement 3.21 – Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species;	Management plan to include monitoring locations	Management plan	Overall	Ongoing	Compliant	
1211:MC4.3.2	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B6-4 is also required to: continue for a minimum of five (5) years to capture construction and post construction phases of the project;	Implement management plan	Results provided in the CAR	Overall	Minimum of 5 years	Compliant	
1211:MC4.3.3	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B6-4 is also required to: include a commitment and timing for the results of each completed survey to be submitted to the 'Shorebirds 2020' initiative, DCCEEW and DBCA;	Results submitted to Shorebirds 2020 initiative	Results provided in the CAR	Overall	Ongoing	Compliant	

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MC4.3.4	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B6-4 is also required to: include trigger and threshold criteria and management actions to be implemented if change in the richness and abundance of migratory shorebirds and other birds are identified; and	Management plans to include trigger and threshold criteria	Management plans	Overall	Ongoing	Compliant	
1211:MC4.3.5	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B6-4 is also required to: unless otherwise agreed by the CEO, the proponent shall not commence any construction of evaporation ponds, crystalliser ponds, intertidal causeway or trestle jetty until the CEO has confirmed by notice in writing that the Migratory Shorebird Monitoring Program (environmental management plan) meets the requirements of condition B6-4.	Not commence construction until plan is approved	Migratory Shorebird Monitoring and Management Plan	Overall	Ongoing	Completed	The management plan was originally approved under MS 1175 on 16 February 2022, prior to any construction activity. The updated plan was approved by DWER on 10 September 2024, prior to construction of the significant amendment.
1211:MC4.4.1	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B3-2 is also required to: when implemented, substantiate and ensure that the outcome of conditions B3 -1 (1) and B3-1 (4) will be met;	Implement the Groundwater Management Plan	Results provided in the CAR	Overall	Ongoing	Compliant	
1211:MC4.4.2	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B3-2 is also required to: provide the details, including timing, of hydrogeological investigations to be carried out that will: (a) provide a detailed understanding of the hydrological regime in the project area; (b) inform the final design of monitoring that will meet the requirement of condition C4-1; (c) inform the final design of management and mitigation actions that will be implemented to meet the outcomes of conditions B3 -1 (1) and B3-1 (4); and	Plan to include hydrogeological investigations	Groundwater Monitoring and Management Plan	Overall	Ongoing	Compliant	
1211:MC4.4.3	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	The environmental management plan required under condition B3-2 is also required to: detail the timing of monitoring bore installation and collection of baseline data, providing justification to demonstrate that data will represent baseline where it is collected after the commencement of operations.	Plan to include monitoring bore and baseline data	Groundwater Monitoring and Management Plan	Overall	Ongoing	Compliant	
1211:MC4.5	Environmental Management Plans: Conditions Relating to Monitoring and Adaptive Management for Outcomes Based Conditions	Without limiting condition C3-1, failure to achieve an environmental outcome, or the exceedance of a threshold criteria, regardless of whether threshold contingency measures have been or are being implemented, represents a non-compliance with these conditions.	Implement management plans	Results provided in the CAR	Overall	Ongoing	Compliant	All threshold exceedance events have been managed as a non-compliance.
1211:MC5.1.1	Environmental Management Plans: Conditions Related to Management Actions and Targets for Objective Based Conditions	The environmental management plans required under condition B6-6 and condition B8-3 must contain provisions which enable the achievement of the relevant objectives of those conditions and substantiation of whether the objectives are reasonably likely to be met, and must include: management actions;	Management plans to include management actions	Cultural Heritage Management Plan	Overall	Ongoing	Compliant	Revision 3 of the Aboriginal Cultural Heritage Management Plan was approved by DWER on 23 August 2024.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MC5.1.2	Environmental Management Plans: Conditions Related to Management Actions and Targets for Objective Based Conditions	The environmental management plans required under condition B6-6 and condition B8-3 must contain provisions which enable the achievement of the relevant objectives of those conditions and substantiation of whether the objectives are reasonably likely to be met, and must include: management targets;	Management plans to include management targets	Cultural Heritage Management Plan	Overall	Ongoing	Compliant	Revision 3 of the Aboriginal Cultural Heritage Management Plan was approved by DWER on 23 August 2024.
1211:MC5.1.3	Environmental Management Plans: Conditions Related to Management Actions and Targets for Objective Based Conditions	The environmental management plans required under condition B6-6 and condition B8-3 must contain provisions which enable the achievement of the relevant objectives of those conditions and substantiation of whether the objectives are reasonably likely to be met, and must include: contingency measures if management targets are not met; and	Management plans to include contingencies measures	Cultural Heritage Management Plan	Overall	Ongoing	Compliant	Revision 3 of the Aboriginal Cultural Heritage Management Plan was approved by DWER on 23 August 2024.
1211:MC5.1.4	Environmental Management Plans: Conditions Related to Management Actions and Targets for Objective Based Conditions	The environmental management plans required under condition B6-6 and condition B8-3 must contain provisions which enable the achievement of the relevant objectives of those conditions and substantiation of whether the objectives are reasonably likely to be met, and must include: reporting requirements.	Management plans to include reporting requirements	Cultural Heritage Management Plan	Overall	Ongoing	Compliant	Revision 3 of the Aboriginal Cultural Heritage Management Plan was approved by DWER on 23 August 2024.
1211:MC5.2.1	Environmental Management Plans: Conditions Related to Management Actions and Targets for Objective Based Conditions	The environmental management plan required under condition B8-3 are also required to include: a map that shows the geographic extent of the area of Aboriginal Cultural Heritage identified and agreed to by the relevant Traditional Owners;	Management plans to include maps of geographic extent	Cultural Heritage Management Plan	Overall	Ongoing	Compliant	Revision 3 of the Aboriginal Cultural Heritage Management Plan was approved by DWER on 23 August 2024.
1211:MC5.2.2	Environmental Management Plans: Conditions Related to Management Actions and Targets for Objective Based Conditions	The environmental management plan required under condition B8-3 are also required to include: a map that shows the areas or site of Aboriginal Cultural Heritage significance that will be avoided;	Management plans to include map of significant sites	Cultural Heritage Management Plan	Overall	Ongoing	Compliant	Revision 3 of the Aboriginal Cultural Heritage Management Plan was approved by DWER on 23 August 2024.
1211:MC5.2.3	Environmental Management Plans: Conditions Related to Management Actions and Targets for Objective Based Conditions	The environmental management plan required under condition B8-3 are also required to include: a framework for consultation with Traditional Owners (Yaburara and Mardudhunera People and Robe River Kuruma People) and other relevant stakeholders during the life of the proposal;	Management plans to include consultation framework	Cultural Heritage Management Plan	Overall	Ongoing	Compliant	Revision 3 of the Aboriginal Cultural Heritage Management Plan was approved by DWER on 23 August 2024.
1211:MC5.2.4	Environmental Management Plans: Conditions Related to Management Actions and Targets for Objective Based Conditions	The environmental management plan required under condition B8-3 are also required to include: a commitment that, in the instance of any previously unrecorded heritage places being identified within the development envelope, the proponent shall avoid the area and must contact the Yaburara and Mardudhunera People and the Robe River Kuruma People and DPLH within ten (10) days of discovery, prior to implementing mitigation actions required; and	Management plans to include commitment to contact the Yaburara and Mardudhunera People and the Robe River Kuruma People if any previously unrecorded heritage places being identified within the development envelope	Cultural Heritage Management Plan	Overall	Ongoing	Compliant	Revision 3 of the Aboriginal Cultural Heritage Management Plan was approved by DWER on 23 August 2024.
1211:MC5.2.5	Environmental Management Plans: Conditions Related to Management Actions and Targets for Objective Based Conditions	The environmental management plan required under condition B8-3 are also required to include: a commitment to ensure that staff and contracting personnel are made fully aware of their obligations under the Aboriginal Heritage Act 1972.	Management plans to include commitment to ensure staff are fully aware of obligations under heritage legislation	Cultural Heritage Management Plan	Overall	Ongoing	Compliant	Revision 3 of the Aboriginal Cultural Heritage Management Plan was approved by DWER on 23 August 2024.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MC5.3	Environmental Management Plans: Conditions Related to Management Actions and Targets for Objective Based Conditions	Without limiting condition C2-1, the failure to achieve an environmental objective, or implement a management action, regardless of whether contingency measures have been or are being implemented, represents a non-compliance with these conditions.	Implement management plans	Results provided in the CAR	Overall	Ongoing	Compliant	
1211:MC5.4	Environmental Management Plans: Conditions Related to Management Actions and Targets for Objective Based Conditions	Without limiting condition C3-1, the failure to achieve an environmental objective, or implement a management action, regardless of whether contingency actions have been or are being implemented, represents a non-compliance with these conditions.	Implement management plans	Results provided in the CAR	Overall	Ongoing	Compliant	
1211:MD1.1.1	Non-compliance Reporting	If the proponent becomes aware of a potential non-compliance, the proponent must: report this to the CEO within seven (7) days;	Notify the CEO	Notification	Overall	As required	Compliant	All incidents have been reported within 7 days of identification.
1211:MD1.1.2	Non-compliance Reporting	If the proponent becomes aware of a potential non-compliance, the proponent must: implement contingency measures;	Implement contingency measures	Report	Overall	As required	Compliant	Contingency measures have been implemented.
1211:MD1.1.3	Non-compliance Reporting	If the proponent becomes aware of a potential non-compliance, the proponent must: investigate the cause;	Investigate events	Report	Overall	As required	Compliant	All incidents have been investigated.
1211:MD1.1.4	Non-compliance Reporting	If the proponent becomes aware of a potential non-compliance, the proponent must: investigate environmental impacts;	Investigate events	Report	Overall	As required	Compliant	All impacts have been investigated.
1211:MD1.1.5	Non-compliance Reporting	If the proponent becomes aware of a potential non-compliance, the proponent must: advise rectification measures to be implemented;	Investigate events	Report	Overall	As required	Compliant	Rectification measures have been implemented.
1211:MD1.1.6	Non-compliance Reporting	If the proponent becomes aware of a potential non-compliance, the proponent must: advise any other measures to be implemented to ensure no further impact; and	Investigate events	Report	Overall	As required	Compliant	Other measures required to ensure no further impact have been implemented.
1211:MD1.1.7	Non-compliance Reporting	If the proponent becomes aware of a potential non-compliance, the proponent must: provide a report to the CEO within twenty-one (21) days of being aware of the potential non-compliance, detailing the measures required in conditions D1-1(1) to D1-1(6) above.	Investigate events	Report	Overall	As required	Compliant	All investigation reports have been provided within 21 days of being aware of the potential non-compliances.
1211:MD1.2	Non-compliance Reporting	Failure to comply with the requirements of a condition, or with the content of an environmental management required under a condition, constitutes a non-compliance with these conditions, regardless of whether the contingency, rectification or other measures in condition D1-1 above have been or are being implemented.			Overall	Ongoing	Compliant	
1211:MD2.1	Compliance Reporting	The proponent must provide an annual Compliance Assessment Report to the CEO for the purpose of determining whether the implementation conditions are being complied with.	Submit annual Compliance Assessment Report	Annual CAR	Overall	Annually	Not Required	First compliance report is due after the reporting period.
1211:MD2.2	Compliance Reporting	Unless a different date or frequency is approved by the CEO, the first annual Compliance Assessment Report must be submitted within fifteen (15) months of the date of this Statement, and subsequent plans must be submitted annually from that date.	Submit annual Compliance Assessment Report	Annual CAR	Overall	By 19 January 2025	Not Required	First compliance report is due after the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MD2.3	Compliance Reporting	Each annual Compliance Assessment Report must be endorsed by the proponent's Chief Executive Officer, or a person approved by proponent's Chief Executive Officer to be delegated to sign on the Chief Executive Officer's behalf.	CAR endorsed by CEO	Annual CAR	Overall	Annually	Not Required	First compliance report is due after the reporting period.
1211:MD2.4.1	Compliance Reporting	Each annual Compliance Assessment Report must: state whether each condition of this Statement has been complied with, including: (a) exceedance of any proposal limits and extents; (b) achievement of environmental outcomes; (c) achievement of environmental objectives; (d) requirements to implement the content of environmental management plans (e) monitoring requirements; (f) requirements to implement adaptive management; and (g) reporting requirements;	CAR to state compliance against conditions	Annual CAR	Overall	Annually	Not Required	First compliance report is due after the reporting period.
1211:MD2.4.2	Compliance Reporting	Each annual Compliance Assessment Report must: include the results of any monitoring (inclusive of any raw data) that has been required under Part C in order to demonstrate that the limits in Part A, and any outcomes or any objectives are being met;	CAR to include results of monitoring	Annual CAR	Overall	Annually	Not Required	First compliance report is due after the reporting period.
1211:MD2.4.3	Compliance Reporting	Each annual Compliance Assessment Report must: provide evidence to substantiate statements of compliance, or details of where there has been a non-compliance;	CAR to provide evidence of compliance	Annual CAR	Overall	Annually	Not Required	First compliance report is due after the reporting period.
1211:MD2.4.4	Compliance Reporting	Each annual Compliance Assessment Report must: include the corrective, remedial and preventative actions taken in response to any potential non-compliance;	CAR include response to any potential non-compliance	Annual CAR	Overall	Annually	Not Required	First compliance report is due after the reporting period.
1211:MD2.4.5	Compliance Reporting	Each annual Compliance Assessment Report must: be provided in a form suitable for publication on the proponent's website and online by the Department of Water and Environmental Regulation;	CAR to be in a form suitable for publication	Annual CAR	Overall	Annually	Not Required	First compliance report is due after the reporting period.
1211:MD2.4.6	Compliance Reporting	Each annual Compliance Assessment Report must: be prepared and published consistent with the latest version of the Compliance Assessment Plan required by condition D2-5 which the CEO has confirmed by notice in writing satisfies the relevant requirements of Part C and Part D;	CAR to be prepared and published as per Compliance Assessment Plan	Annual CAR	Overall	Annually	Not Required	First compliance report is due after the reporting period.
1211:MD2.4.7	Compliance Reporting	Each annual Compliance Assessment Report must: an outline of the success of implementation of Projects A, B and C, including progress against completion criteria; and	CAR include summary of research projects	Annual CAR	Overall	Annually	Not Required	First compliance report is due after the reporting period.
1211:MD2.4.8	Compliance Reporting	Each annual Compliance Assessment Report must: the details of payments made with consideration for the requirement of conditions B10-2 and B10-4.	CAR provide evidence of payments	Annual CAR	Overall	Annually	Not Required	First compliance report is due after the reporting period.
1211:MD2.5	Compliance Reporting	The proponent must prepare a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition D2-2, or prior to implementation of the proposal, whichever is sooner.	Submit Compliance Assessment Plan	Compliance Assessment Plan	Overall	By 19 July 2024 or prior to implementation of proposal	Completed	The Compliance Assessment Plan was submitted on 21 February 2024 and approved on 27 September 2024.
1211:MD2.6.1	Compliance Reporting	The Compliance Assessment Plan must include: what, when and how information will be collected and recorded to assess compliance;	Submit Compliance Assessment Plan	Compliance Assessment Plan	Overall	Ongoing	Completed	The Compliance Assessment Plan was submitted on 21 February 2024 and approved on 27 September 2024.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MD2.6.2	Compliance Reporting	The Compliance Assessment Plan must include: the methods which will be used to assess compliance;	Submit Compliance Assessment Plan	Compliance Assessment Plan	Overall	Ongoing	Completed	The Compliance Assessment Plan was submitted on 21 February 2024 and approved on 27 September 2024.
1211:MD2.6.3	Compliance Reporting	The Compliance Assessment Plan must include: the methods which will be used to validate the adequacy of the compliance assessment to determine whether the implementation conditions are being complied with;	Submit Compliance Assessment Plan	Compliance Assessment Plan	Overall	Ongoing	Completed	The Compliance Assessment Plan was submitted on 21 February 2024 and approved on 27 September 2024.
1211:MD2.6.4	Compliance Reporting	The Compliance Assessment Plan must include: the retention of compliance assessments;	Submit Compliance Assessment Plan	Compliance Assessment Plan	Overall	Ongoing	Completed	The Compliance Assessment Plan was submitted on 21 February 2024 and approved on 27 September 2024.
1211:MD2.6.5	Compliance Reporting	The Compliance Assessment Plan must include: the table of contents of Compliance Assessment Reports, including audit tables; and	Submit Compliance Assessment Plan	Compliance Assessment Plan	Overall	Ongoing	Completed	The Compliance Assessment Plan was submitted on 21 February 2024 and approved on 27 September 2024.
1211:MD2.6.6	Compliance Reporting	The Compliance Assessment Plan must include: how and when Compliance Assessment Reports will be made publicly available, including usually being published on the proponent's website within sixty (60) days of being provided to the CEO.	Submit Compliance Assessment Plan	Compliance Assessment Plan	Overall	Ongoing	Completed	The Compliance Assessment Plan was submitted on 21 February 2024 and approved on 27 September 2024.
1211:MD2.7	Compliance Reporting	The proponent shall submit a ten (10) yearly Environmental Performance Report to the CEO within three (3) months of the expiry of the ten (10) year period commencing from the date of substantial commencement of the proposal, or such other time as may be approved in writing by the CEO.	Submit Environmental Performance Report	Environmental Performance Report	Overall	By 19 January 2033	Not Required	First compliance report is due after the reporting period.
1211:MD2.8.1	Compliance Reporting	Each Environmental Performance Report shall report on proposal impacts on the following environmental values: state of algal mats;	Submit Environmental Performance Report	Environmental Performance Report	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MD2.8.2	Compliance Reporting	Each Environmental Performance Report shall report on proposal impacts on the following environmental values: state of mangroves inside and outside the RRDMMMA;	Submit Environmental Performance Report	Environmental Performance Report	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MD2.8.3	Compliance Reporting	Each Environmental Performance Report shall report on proposal impacts on the following environmental values: state of groundwater;	Submit Environmental Performance Report	Environmental Performance Report	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MD2.8.4	Compliance Reporting	Each Environmental Performance Report shall report on proposal impacts on the following environmental values: state of surface water;	Submit Environmental Performance Report	Environmental Performance Report	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MD2.8.5	Compliance Reporting	Each Environmental Performance Report shall report on proposal impacts on the following environmental values: holistic assessment of proposal impacts against environmental values, including a comparison of the state of each environmental value at the beginning and end of the ten (10)-year period; and	Submit Environmental Performance Report	Environmental Performance Report	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MD2.8.6	Compliance Reporting	Each Environmental Performance Report shall report on proposal impacts on the following environmental values: proposed adaptive management and continuous improvement strategies.	Submit Environmental Performance Report	Environmental Performance Report	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MD2.9	Compliance Reporting	The Environmental Performance Report may be in whole or part prepared in conjunction with other proponents where there are cumulative impacts from their proposals.	Submit Environmental Performance Report	Environmental Performance Report	Overall	Ongoing	Not Required	First compliance report is due after the reporting period.
1211:MD3.1	Contact Details	The proponent must notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Notify CEO of any changes		Overall	As required	Not Required	First compliance report is due after the reporting period.
1211:MD4.1	Time Limit for Proposal Implementation	The proposal must be substantially commenced within five (5) years from the date of this Statement.	Project to have substantially commenced.		Construction	By 19 October 2028	Completed	The project commenced on 22 February 2022 and the significant amendment commenced on 10 September 2024.
1211:MD4.2	Time Limit for Proposal Implementation	The proponent must provide to the CEO documentary evidence demonstrating that they have complied with condition D4-1 no later than fourteen (14) days after the expiration of period specified in condition D4-1.	Provide evidence to the CEO in writing to demonstrate the proposal has substantially commenced.		Construction	By 2 November 2029	Completed	Mardie Minerals notified the department on 13 September 2024.
1211:MD4.3	Time Limit for Proposal Implementation	If the proposal has not been substantially commenced within the period specified in condition D4-1, implementation of the proposal must not be commenced or continued after the expiration of that period.	Project to have substantially commenced.		Construction	By 19 October 2028	Not Required	
1211:MD5.1	Public Availability of Data	Subject to condition D5-2, within a reasonable time period approved by the CEO upon the issue of this Statement and for the remainder of the life of the proposal, the proponent must make publicly available, in a manner approved by the CEO, all validated environmental data collected before and after the date of this Statement relevant to the proposal (including sampling design, sampling methodologies, monitoring and other empirical data and derived information products (e.g. maps)), environmental management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	All validated environmental data, management plans and reports required by MS1175 made publicly available in a manner as approved by the CEO as outlined by PAG4 for "Making information publicly available" published August 2012.	Information made available upon request, in accordance with PAG 4.	Overall	Ongoing	Compliant	
1211:MD5.2.1	Public Availability of Data	If: any data referred to in condition D5-1 contains trade secrets; or	Submit a request for approval from the CEO to not make retain confidentiality.		Overall	Ongoing	Compliant	
1211:MD5.2.2	Public Availability of Data	If: any data referred to in condition D5-1 contains particulars of confidential information (other than trade secrets) that has commercial value to a person that would be, or could reasonably be expected to be, destroyed or diminished if the confidential information were published.	Submit a request for approval from the CEO to not make retain confidentiality.		Overall	Ongoing	Compliant	
1211:MD5.3	Public Availability of Data	The proponent may submit a request for approval from the CEO to not make this data publicly available and the CEO may agree to such a request if the CEO is satisfied that the data meets the above criteria.	Submit a request for approval from the CEO to not make retain confidentiality.		Overall	Ongoing	Not Required	
1211:MD5.4	Public Availability of Data	In making such a request the proponent must provide the CEO with an explanation and reasons why the data should not be made publicly available.	Submit a request for approval from the CEO to not make retain confidentiality.		Overall	Ongoing	Not Required	

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1211:MD6.1	Independent Audit	The proponent must arrange for an independent audit of compliance with the conditions of this statement, including achievement of the environmental outcomes and/or the environmental objectives and/or environmental performance with the conditions of this statement, as and when directed by the CEO.	Arrange independent audit	Independent audit report	Overall	As required	Not Required	
1211:MD6.2	Independent Audit	The independent audit must be carried out by a person with appropriate qualifications who is nominated or approved by the CEO to undertake the audit under condition D6-1.	Arrange independent audit	Independent audit report	Overall	As required	Not Required	
1211:MD6.3	Independent Audit	The proponent must submit the independent audit report with the Compliance Assessment Report required by condition D2, or at any time as and when directed in writing by the CEO. The audit report is to be supported by credible evidence.	Submit independent audit	Independent audit report	Overall	As required	Not Required	
1211:MD6.4	Independent Audit	The independent audit report required by condition D6-1 is to be made publicly available in the same timeframe, manner and form as a Compliance Assessment Report, or as otherwise directed by the CEO.	Make independent audit report publicly available	Independent audit report	Overall	As required	Not Required	









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Final Audit Report

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