PERDAMAN INDUSTRIES

CHEMICALS & FERTILISERS

2024-25 Compliance Assessment Report

Perdaman Urea Project

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

Proponent:

Perdaman Chemicals and Fertilisers Pty Ltd

ABN: 31 121 263 741

Date: 24 April 2025

Ministerial Statement No 1180

PERDAMAN INDUSTRIES

CHEMICALS & FERTILISERS

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1 Introduction

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

1.1 Project Background

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

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

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

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

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

1.2 Purpose and Scope

This CAR documents compliance with conditions in MS 1180 for the period 24 January 2024 to 23 January 2025 (2024-25 Reporting Period), in accordance with Conditions 15-3, 15-6 and 15-7:

Condition 15-3

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

Refer to Section 3, Appendices A and B of this Report.

Condition 15-6

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

Condition 15-7

Each Compliance Assessment Report shall:

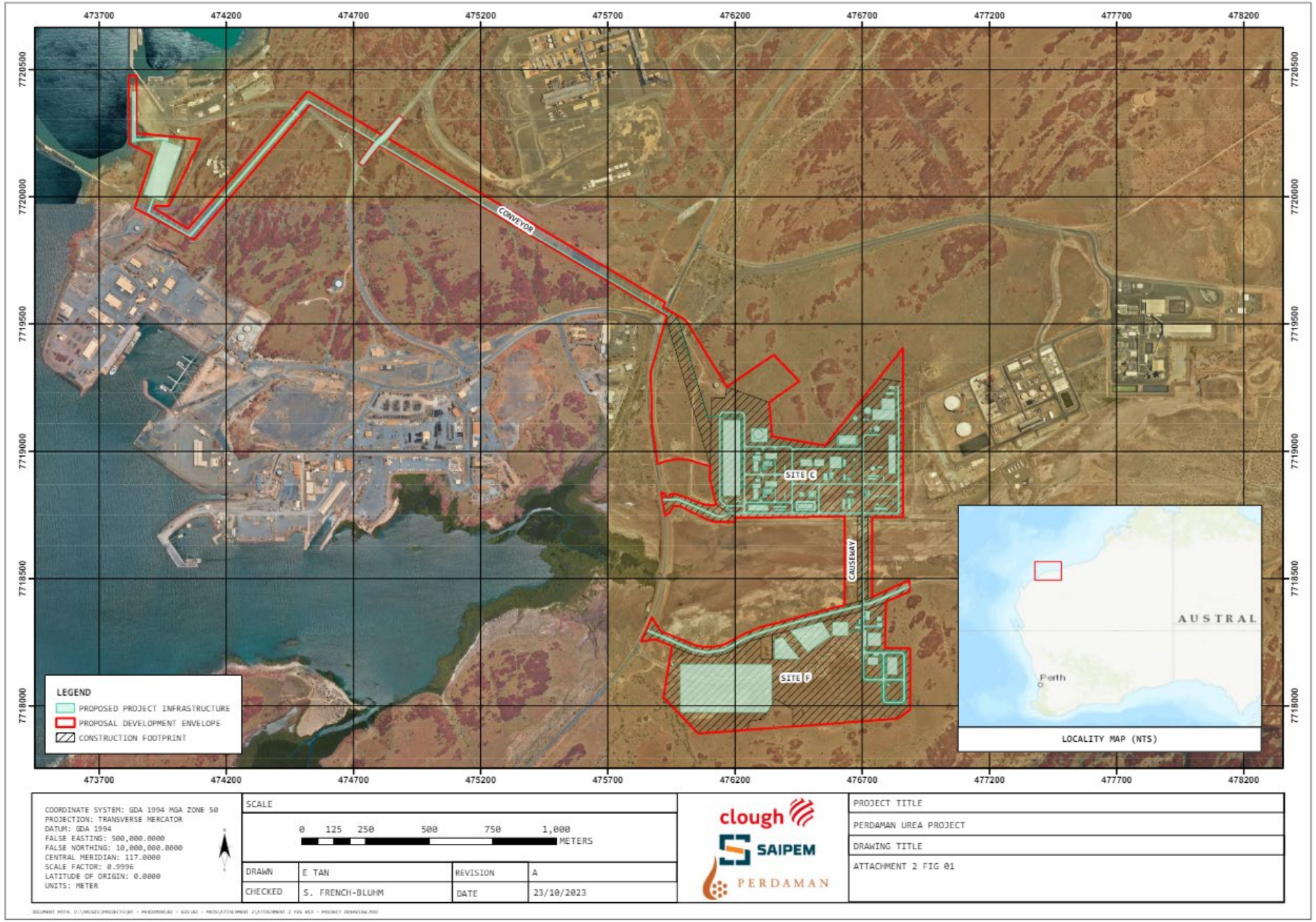
1. be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf;
2. include a statement as to whether the proponent has complied with the conditions;
3. identify all potential non-compliances and describe corrective and preventative actions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

This CAR documents compliance with conditions identified in MS 1180 in accordance with the Confirmed Compliance Assessment Plan (PCF-PD-EN-CAP) which was approved by the CEO on 17 March 2022.

In accordance with the Compliance Assessment Plan approval letter from DWER on 17 March 2022, the CAR is due annually on the 24 April.

1.3 Compliance Assessment Plan

This CAR has been developed in accordance with the Compliance Assessment Plan (CAP) (PCF-PD-EN-CAP) which was approved by the CEO on 17 March 2022.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2 Summary of the Proposal Implementation Status

The Proponent has continued the implementation of the Proposal, during the 2024 - 2025 reporting period, however the proposal (under MS 1180) has not yet been fully implemented.

The Proposal is in the construction phase, with civil works having commenced on 26 July 2024. Ground Disturbance commenced with vegetation clearing on 11 July 2023 (during last reporting period) with clearing completed on 29 June 2024 (during this reporting period).

Within the period 24 January 2024 to 23 January 2025, works commenced within the following physical elements:

- development envelope within (Site C and F);
- disturbance footprint within (Site C and F);
- Laydown Area within Site F; and
- Utility Block (site C)

No Operational elements have commenced.

Project work within the physical areas mentioned above have included:

- Civil, foundation and drainage works
- Clearing of vegetation with the conveyor corridor being the final area cleared, completed in June 2024,
- Causeway construction between Site F and C was completed on 8 May 2024.
- Works at the port commenced on 27 November 2024.

3 Statement of Compliance

3.1 Proposal and Proponent Details

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

3.2 Statement of Compliance Details

Reporting Period	***24/01/24*** **to** ***23/01/25***

Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction		Construction	✓	Operation		Decommissioning	

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	Appendix B

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)			
No (please proceed to Section 3)	✓	Yes (please proceed to Section 4)	

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

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

Non-compliance/potential non-compliance 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
Condition 5-6 (5)	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Non-Compliant.	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
31 October 2024	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
☐ Reported to DWER verbally Date _____ ✓Reported to DWER in writing 3 October and 10 October 2024	No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
A non-compliance with Threshold Criterion 14 within the Confirmed Threatened Species Management Plan (TSMP) was identified on the 3 October 2024 and formally reported to DWER and DCCEEW on 10 October 2024, in accordance with MS1180 Condition 5-6(1). Management Action 14 of the TSMP (Attachment C) states *"Machinery will idle for at least 30 mins, prior to the commencement of clearing"* this is reflected in the Threshold Criterion 14: "*Machinery not left in idle for 30 minutes before mobilization*." The breach occurred when machinery did not idle for the full 30 minutes on some occasions prior to clearing activities. Following the notification, actions were undertaken in accordance with Conditions 5-6(2), (3), and (4). The approval holder assessed the exceedance as low risk in terms of potential environmental harm, based on the absence of fauna injuries or deaths, and the presence of fauna spotters and other controls in place at the time. A review of the relevance and practicality of the idling requirement was undertaken in consultation with the site team and Perdaman. This assessment was completed in December 2023. Based on this review, the TSMP was revised, and Version PCF-PD-EN-TSMP-PCF6 was submitted to DCCEEW for approval on 7 February 2024. The revised plan removes Management Action 14 and associated trigger and threshold criteria. Although actions under 5-6(2) to (4) were completed, Condition 5-6(5) requires a separate written report to be submitted to the CEO and DCCEEW within 21 days of the initial notification under 5-6(1). The approval holder considered further investigation and reporting of this matter not required and as the requirements of Condition 5-6 had been addressed via action already taken. This report was not submitted, and therefore, a secondary non-compliance with Condition 5-6(5) has occurred. This is considered an administrative non-compliance only, with no environmental impact resulting from the original exceedance. The exceedance was managed appropriately, and relevant management documentation was proactively updated and submitted for approval.	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
N/A	

What was the cause(s) of the non-compliance or potential non-compliance?
Proponent determined that a further report was not required, as the information required (5-6(5)(a),(b),(c),(d),(e) and (f)) by a further report was detailed within the initial notification. (2025.1180.M5.6.NC).
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?
To ensure compliance with Condition 5-6(5) moving forward, the Proponent will prepare and submit a separate follow-up report for any future threshold exceedances, even where the information has already been provided through other notifications. The Proponent acknowledges that, although the initial notification dated 10 October 2024 included all relevant details required under sub-clauses (a) through (f), a formal follow-up report should have been submitted as a standalone document in accordance with the condition. This procedural oversight has been noted, and internal processes will be updated to prevent recurrence.
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?
N/A
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: • **in the reporting period addressed in this Statement of Compliance; and** • **as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.** (the above information may be provided as an attachment to this Statement of Compliance)

Non-compliance/potential non-compliance 3-2

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
Condition 5-7 states the Proponent must not cause or allow: (2): *the exceedance of a threshold criteria (regardless of whether the relevant management and/or contingency actions have been or are being implemented).* *(3): failure to comply with the requirements of the Confirmed Fauna Management Plan or the Confirmed Threatened Species Management Plan.*	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Non-Compliant.	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
This non-compliance was identified in October 2024 and reported on 10 October 2024 via formal notification to DWER (Ref: 2025.1180.M5.6.NC).	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
☐ Reported to DWER verbally Date _____ ✓Reported to DWER in writing Date DWER notified – Management Action 14 | Threshold 14 - 10 October 2024	Yes
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
Condition 5-7 states the Proponent must not cause or allow: (1) failure to implement one or more management / contingency actions, if the threshold criteria has been exceeded;	

(2) the exceedance of a threshold criteria (regardless of whether the relevant management and/or contingency actions have been or are being implemented); and/or
(3) Failure to comply with the requirements of the **Confirmed** Fauna Management Plan or the **Confirmed** Threatened Species Management Plan.

A non-compliance with both subclauses (2) and (3) was identified during the preparation of the EPBC Annual Compliance Report in October 2024. This was formally reported to DWER under MS1180 Condition 5-6(1) via letter notification dated 9 October 2024 (Ref: 2025.1180.M5.6.NC).

The non-compliance relates to **Management Action 14 and Threshold Criterion 14** of the Confirmed TSMP (Attachment C), which state:

- *"Machinery will idle for at least 30 minutes prior to the commencement of clearing" (MA14);*
- *"Machinery not left in idle for 30 minutes before mobilisation" (Threshold 14).*

This requirement was not implemented on-site during clearing activities within the reporting period. As such, both the management action and the associated threshold criterion were not met.

Extent of Impacts
There were no observed or recorded impacts to threatened species or native fauna resulting from the non-compliance.

Robust fauna management practices were implemented during the clearing activities, including:

- Preclearing fauna trapping and translocation by qualified ecologists (Trace and GHD);
- Full-time presence of trained and licensed fauna spotters, monitoring equipment and clearing zones;
- Use of a Fauna Interaction Register, with no recorded incident; and
- Avoidance of key habitat features such as rocky outcrops and water sources.

No fauna were reported injured or killed as a result of vehicle strike, entrapment, or interaction with machinery. No Pilbara Olive Pythons or other listed species were encountered in association with machinery or during clearing.

Given the management controls in place, and absence of fauna-related impacts, the non-compliance with the 30-minute idling requirement did not result in a measurable adverse impact on fauna and was effectively mitigated.

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

Refer to Map Figure 1 in this CAR (PDE)

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

The non-compliance with Management Action 14 and Threshold Criterion 14 of the Threatened Species Management Plan (TSMP) arose due to a combination of procedural and interpretive issues.

Management Action 14 of the TSMP requires that *"Machinery will idle for at least 30 minutes prior to the commencement of clearing."* The associated threshold criterion (Threshold 14) also reflects this same mandatory requirement.

During the brief clearing activities in 2024, machinery was generally started and subjected to standard pre-start checks, which typically lasted close to 30 minutes. However, this period varied depending on the task and was not always consistently timed or documented. As a result, it could not be demonstrated that the 30-minute idling period was fully implemented prior to all clearing activities.

This requirement was not explicitly embedded in the site's pre-clearing protocols, checklists, or environmental briefings, and therefore was not clearly communicated to field teams. Further confusion stemmed from the related but more flexible language in the Confirmed Fauna Management Plan (FaMP), which includes a similar idling action prefaced with *"where practicable."* This led to a mistaken assumption by some personnel that the TSMP requirement was also discretionary.

As a result, the strict implementation of the TSMP's 30-minute idling requirement was not consistently achieved, constituting a non-compliance with both the management action and the associated threshold criterion.
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?
To address the non-compliance with Threshold Criterion 14 / Management Action 14, the proponent has revised the Threatened Species Management Plan PCF-PD-EN-TSMP-PCF6 and submitted to DCCEEW for approval on the 7 February 2024. This revised version (Version 6) removes Management Action 14 and associated trigger and threshold criterion.
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?
Threshold Criterion 14 Management Action 14 Best practice fauna management protocols were in place during clearing, including pre-clearing and translocation surveys prior to clearing and the presence of licensed fauna spotters. While these controls effectively supported the intent of Management Action 14, the specific requirement for machinery to idle for a minimum of 30 minutes prior to clearing was not explicitly embedded into clearing checklists or field protocols. This limited visibility contributed to inconsistent application across all clearing activities. To prevent recurrence, a revised version of the TSMP (v6) has been submitted to DCCEEW, which removes MA14 and its associated threshold, reflecting a shift toward more practical and targeted fauna protection measures. If similar conditions are applied in future, they will be clearly embedded into field protocols and tracked through pre-start documentation and GDP procedures.
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. (the above information may be provided as an attachment to this Statement of Compliance)

Non-compliance/potential non-compliance 3-3

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
Condition 8-6 (3): …the proponent must not cause or allow (3) failure to comply with the requirements of the Confirmed Surface Water Management Plan.	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Non-compliant.	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
Throughout the reporting period, it was identified during the preparation of the 2024-2025 CAR (24 April 2025).	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
☐ Reported to DWER verbally Date _____ ✓ Reported to DWER in writing As part of this CAR submission, it will be further reported to DWER in a letter following the CAR submission.	No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-	

compliance?

The condition requires that the proponent must not cause or allow:

(3) failure to comply with the requirements of the Confirmed Surface Water Management Plan.

During the 2024–25 reporting period, monthly surface water monitoring was conducted in accordance with monthly requirements, with site inspections and field measurements undertaken at designated locations (SW1–SW6, SWDC1–3) following rainfall events. In dry months, visual checks were carried out as required, and sampling was not conducted due to an absence of surface water.

However, a non-compliance occurred due to a misinterpretation of the SWMP's laboratory analysis requirements.

Table 2-3 of the SWMP requires **monthly sampling and laboratory analysis** during construction, including metals, nutrients, TRH, BTEXN, PAHs, and other analytes. This requirement was not implemented. Instead, the project team relied on Tables 2-4 and 2-5, which state that laboratory sampling is required "during or directly after rainfall" and primarily at discharge points. This led to the understanding that laboratory analysis at SW1–SW6 and SWDC1–SWDC3 was only required when surface water discharges occurred.

Note: Surface water sites SW1–SW6 represent upstream ephemeral drainage lines and remained dry during the reporting period. Aerial imagery, site inspections, and field checks confirm no ponded water was present at these locations, and sampling was not required.

As a result:

- **Laboratory sampling of the full suite of analytes** (metals, nutrients, hydrocarbons, etc.) was not undertaken during eligible sampling events (when surface water was present).
- As a result, **field measurements were taken**, but laboratory analysis was **not performed** during eligible sampling events.
- Additionally, **during the January 2025 cyclone event**, when site discharges occurred for the first time, **no laboratory samples were submitted**, despite field parameters being recorded. This represents a second deviation from the SWMP.

Discharge event – January

During Cyclone Sean (18–20 January 2025), temporary construction sediment basins at Site F overtopped, and some water discharged from Site C through erosion and sediment controls. Field sampling was undertaken at WQ2, WQ3, WQ4, WQ5, WQ7, SWDC2, and SWDC3, and **all field parameters were within acceptable thresholds**. However, no laboratory samples were submitted, which is **required under Table 2-4** when discharges occur.

Extent of Impacts

Although laboratory analysis was not conducted in accordance with Table 2-3, field parameters were measured consistently, and no indicators of water quality degradation were observed.

- **No hydrocarbons**, odours, foaming, or turbidity concerns were recorded.
- Nutrient sources such as urea were not present as the site is not operational, and there were no known on-site discharges of contaminants of concern (nutrients).
- Discharges during the January cyclone were contained, and downstream field results complied with the SWMP thresholds.

While this represents a **procedural non-conformance**, there is **no evidence of environmental harm**, and Condition 8-1 (protection of hydrological regimes and surface water values) is considered to have been met.

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

The non-compliance relates to surface water monitoring and sampling procedures at the following locations, as defined in the Confirmed Surface Water Management Plan:

- Surface Water Monitoring Points: SWDC1–SWDC3 (surface water diversion channels) located within and adjacent to Sites C and F.
- Discharge Monitoring Locations: Downstream of sediment basins at Site F and stormwater discharge points from Site C.
- Observed discharge event: Downstream of Site C (locations WQ2, WQ3, SWDC2, SWDC3)

during the January 2025 cyclone event.

Refer to Map 2025.1180.M8.1.NC for spatial context.

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

The non-compliance resulted from a combination of procedural oversight, misinterpretation of monitoring requirements, and site-specific constraints during the 2024–25 reporting period.

During the January 2025 cyclone event, surface water discharges occurred via overtopping of sediment basins at Site F and controlled flow through erosion and sediment controls at Site C. While field parameters were measured downstream in accordance with the SWMP, the required NATA-accredited laboratory analysis was not completed. This procedural oversight meant that compliance with Trigger and Threshold Criteria 2 could not be formally verified, despite field results indicating no signs of environmental impact.

Separately, monthly laboratory analysis of surface water at designated monitoring locations (SWDC1–SWDC3) was not conducted during rainfall-triggered events. This was due to an internal misinterpretation of the Confirmed SWMP, in which Tables 2-4 and 2-5 were read as limiting laboratory sampling to discharge points or active discharge conditions only. As a result, while ten rainfall-driven monitoring events were conducted, laboratory testing was not performed for any of them.

Although laboratory analysis was not completed, field measurements did not indicate exceedances of SWMP thresholds, and no environmental harm was observed or recorded.

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

In response to the non-compliance, the proponent has taken immediate steps to strengthen monitoring oversight and ensure future compliance with the Confirmed Surface Water Management Plan.

- The site inspection templates and monitoring registers are being updated to clearly flag when laboratory sampling is required in accordance with Table 2-3 of the SWMP.
- A compliance clarification note has been issued internally to confirm that laboratory samples must be submitted during eligible rainfall events where surface water is present, irrespective of whether discharge from basins has occurred.
- A governance review of the environmental monitoring system is underway to identify further improvements in how compliance triggers are communicated, implemented, and tracked across site teams.
- Targeted refresher training will be provided to environmental personnel to ensure accurate interpretation and application of SWMP monitoring provisions.

These actions are intended to close procedural gaps, reinforce the project's compliance framework, and prevent similar omissions during future monitoring periods.

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

At the time of the non-compliance, the project had several baseline controls in place to support compliance with surface water monitoring requirements:

- A documented Surface Water Management Plan (SWMP) outlining sampling frequency, parameters, and locations.
- A monitoring schedule and site inspection regime, linked to rainfall events, supported by a register used by the environmental team.
- Standard operating procedures for field sampling, including surface water quality monitoring register and field data sheets.
- Chain-of-custody forms were used to prepare samples for laboratory submission where required.

However, while these systems supported the collection of field parameters and general oversight of monitoring activity, the surface water quality monitoring register flagged laboratory analysis was only required after a discharge from site occurred, and was inconsistent with the SWMP requirements.

To prevent recurrence, the following amendments have been made:

- **Field forms and monitoring registers** are being updated to explicitly identify when laboratory sampling is required based on rainfall, discharge activity, and SWMP tables.
- A **governance review** of environmental monitoring systems is underway, focused on aligning field processes with compliance expectations.
- **Clarification of SWMP provisions** has been issued to the environmental team to avoid future

misinterpretation of requirements.

These actions aim to ensure the site team is equipped with the tools and clarity required to consistently meet the monitoring obligations of the Confirmed SWMP.

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

in the reporting period addressed in this Statement of Compliance; and

as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.

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

Non-compliance/potential non-compliance 3-4

Which implementation condition or procedure was non-compliant or potentially non-compliant?

Condition 8-6(3) (Confirmed Surface Water Management Plan – groundwater monitoring requirements)

Was the implementation condition or procedure non-compliant or potentially non-compliant?

Non-compliant.

On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?

Throughout the reporting period, it was identified during the preparation of the 2024-2025 CAR (24 April 2025).

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?

☐ Reported to DWER verbally Date _____

✓ Reported to DWER in writing

As part of this CAR submission, it will be further reported to DWER in a letter following the CAR submission.

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?

The groundwater monitoring bores established during early project phases were decommissioned in October and November 2023 to enable bulk earthworks and infrastructure construction. No replacement bores were installed during the 2024–25 reporting period, and therefore formal groundwater level and quality monitoring was not undertaken as outlined in the Baseline Hydrogeological Assessment and SWMP.

It is noted that Condition 6-3 of MS1180 requires the proponent to monitor groundwater levels and quality only *"in the event that the studies referred to in condition 6-2 indicate that dewatering would be required during construction."* As no dewatering (as defined under relevant approvals) was required or undertaken during construction, and the Hydrogeological Assessment prepared under Condition 6-2 confirmed that dewatering would not be necessary, monitoring against trigger and threshold criteria was not explicitly mandated under MS1180 during the construction phase.

However, the baseline hydrological report prepared for the project specifies that groundwater quality monitoring should occur every six months throughout construction, and the SWMP requires quarterly sampling during this phase. These obligations were not fulfilled during the reporting period, due to a misinterpretation that groundwater monitoring applied only during operational phases or in the presence of dewatering impacts.

Limited groundwater sampling was undertaken at a single retained bore, BH22, one of the original monitoring bores for the project. BH22 is located upgradient of active construction areas and is considered hydrologically separated from any potential project-related impacts, making it representative of background conditions. Water quality data from BH22 was collected at a frequency greater than that required by the Confirmed Plans.

While most parameters remained within the baseline range, elevated nitrate concentrations were recorded in several BH22 samples during late 2024. These results are under review and are not considered to be attributable to project activities as the location is upgradient and hydrologically

separated from any potential project-related impacts. No construction activities undertaken during the reporting period involve the use, storage, or generation of nutrient-rich materials, and there are no known sources of nitrate contamination associated with bulk earthworks, general civil construction, or site establishment works. In addition, the urea plant, which may represent a future potential source of nitrogen, has not been constructed or commissioned during this time. The elevated nitrate readings may instead reflect background variation or sampling artifacts associated with low-flow conditions and aeration during sampling. On this basis, there is no evidence linking the observed exceedances to project-related impacts.

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

Project Development Envelope (PDE) – groundwater monitoring network across Site C and Site F.

See Map 2025.1180.M6.6.NC

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

The primary cause of the non-compliance was the decommissioning of the original groundwater monitoring bore network in late 2023 to enable bulk earthworks and infrastructure construction, without timely installation of replacement bores.

This was compounded by a misinterpretation that monitoring was guided by Ministerial Condition 6-3, which only requires groundwater monitoring if dewatering (as defined under relevant approvals) during construction. As the approved Hydrogeological Assessment confirmed that dewatering was not required, it was incorrectly assumed that groundwater monitoring obligations did not apply during this phase.

Further contributing to the non-compliance was the delay in confirming appropriate locations for replacement bores. The design and placement of new bores must account for construction-free zones, updated site layouts, and local groundwater flow conditions, and is now scheduled for completion by July 2025.

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

The proponent is finalising plans for installation of new groundwater monitoring bores in consultation with the design and construction teams. Installation is scheduled to commence in July 2025. Once installed, quarterly groundwater monitoring (including water levels and laboratory analysis) will resume in accordance with the Confirmed Hydrogeological Plan and SWMP. The proponent will also review and, if necessary, revise the Hydrogeological Plan to reflect new bore locations and monitoring schedules.

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

Groundwater monitoring requirements were included in the Confirmed Plans.

However, the connection between those requirements and construction-phase obligations was not clearly captured in handover documentation or planning tools. The loss of monitoring coverage during the transition to construction was not identified early enough to trigger corrective actions.

To prevent recurrence, a governance review of environmental monitoring systems is underway. This will include clearer integration of groundwater monitoring obligations into construction schedules, updated roles and responsibilities, and enhanced tracking of bore condition and coverage across all stages of the project.

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

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

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

Non-compliance/potential non-compliance 3-5

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
Condition 9-7	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Non-compliant.	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
Unknown, it was identified during the preparation of the EPBC ACR in October 2024.	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
☐ Reported to DWER verbally Date _____ ✓ Reported to DWER in writing Date _____ 22 October 2024 via email and letter attachment.	
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
The condition requires that the Proponent to not cause or allow a failure to comply with the requirements of the Confirmed CHMP. The management targets form part of these requirements. Details of non-compliances with the Confirmed Cultural Heritage Management Plan include: **CHM Target 15** • *Chain mesh and wire fence 2.2 meters (m) in height installed around the perimeter of the Project Area before construction commences.* The Project has not used fencing in accordance with this target. The final methodology for temporary fencing was adopted to address safety issues and proximity of fencing to sensitive heritage sites. The star picket and stand wires methodology allowed installation of fencing from the inside of the Project area prior to clearing, rather than disturbing potential sensitive areas outside the Project boundary. It should be noted that the final installed fence shall comply with CHMP Target 15 with a total height of 2.2 meters (m). Noting no environmental harm or heritage impacts were caused as a result of this non-achievement of CHM – Management Target 15. **CHM Target 16** • *Signage will be at least 1m² in size and attached to fencing at the entrance to the Project Area at no less than 50m intervals along the fence prior to construction commencing.* Signage used has not been in accordance with this Target. Signs are attached to fencing in line with the target requirement at intervals of less than 50m along the perimeter fence, however signage is not 1m2 in size. The size of the installed signage is in line with construction standards at 450mm by 300mm and is prominently visible on the fence. Signage in the size specified in CHMP Target 16 was not available during the installation of the temporary fence, and alternative signage was utilized in order to comply with Management Action 16. No environmental harm has been caused. <u>Extent of Impacts</u> It should be noted that these two non-achievements are considered to be very minor in nature, with an investigation at the time identified the cause and that there is no need for corrective or preventive actions (aside from minor amendment to the confirmed CHMP), as there has been no environmental harm resulting from the non-achievement.	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
Site C and Site F boundaries	

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

CHM Target 15

A fence of this height (2.2m) is intended as the permanent site fence, which could not be installed prior to ground disturbing activities. Bulk earthworks and levelling of the site perimeter to finished height is needed prior to installation of a permanent fence to overcome accessibility issues, avoid rework, and minimise potential for disturbance outside of the approved disturbance footprint.

CHM Target 16

Signage at 1m x 1m must be custom made and could not be sourced at the time of installation, ahead of ground disturbance works (i.e. prior to construction commencing).

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

CHM Target 15

SCJV installed the temporary fencing (1.2m high 3 strand wire and star pickets) to coincide with the commencement of ground disturbance works and in the absence of a permanent fence design, to protect heritage and environmental values outside of the approved disturbance footprint. The final methodology for temporary fencing was adopted to address access and safety issues with fencing in close proximity to sensitive heritage sites. The star picket and stranded wire fence was able to be installed entirely from the inside of the Project area prior to ground disturbance.

Permanent fencing design has now been approved and a sub-contractor awarded for the installation works.

Fencing materials are to be shipped to site and installation to be conducted in a staged process-end of 2024 / early 2025. The staged fencing installation is required to minimise disruptions to the construction schedule. Stage 1 perimeter fence construction works will involve constructing the northern boundary of area C and the entire Area F (scheduled to be completed by the end of March 2025); which should largely satisfy the intent of the commitment (avoiding and minimising potential for impacts to heritage sites from the premises).

It should be noted that the heritage area in Area F (Standing Rocks) is fenced to the required standard to prevent unauthorised access (greatest risk). Stage 2 fencing will include the remaining perimeter fencing at Area C. Note, fencing construction for complete enclosure of Area C (Stage 2) is being delayed enabling safe entry of oversized modules to be brought onto site during construction, and enable establishment of conveyor system. Fencing around Area C is expected to be completed by February 2026.

CHM Target 16

The size of the installed signage is in line with construction standards at 450 millimetres (mm) by 300mm, is prominently visible on the fence and has been installed in line with the target requirement at intervals of less than 50m along the perimeter fence.

No additional management actions have been implemented to prevent non-achievement of the management targets. Perdaman will review and update the latest revision of the Confirmed Cultural Heritage Management Plan (PCF 8) to reflect the findings of the investigation carried out as part of the identification of non-achievements of the management targets.

CHM – Management Target 15

CHMP Management Target 15 will be amended to note the following – *'Temporary fencing will be installed before ground disturbance commences around the perimeter of Site C and Site F. Chain mesh and wire fence 2.2m in height will be installed to replace the temporary fence in stages around the perimeter of Site C and Site F commencing in the first quarter of 2025 and to be completed following delivery of the final oversized modules during the first quarter of 2026'.*

CHM – Management Target 16

CHMP Management Target 16 will be amended to note the following – '*Signage will be at least construction standard size (i.e. 450mm by 300mm) and attached to fencing at the entrance to the Project Area at no less than 50m intervals along the fence prior to construction commencing'.*

What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?
NA
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. (the above information may be provided as an attachment to this Statement of Compliance)

Proponent Declaration

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

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

(being the person responsible for the proposal) to submit this form and that the information contained in this form is true and not misleading.

Signature:..... Date: 24.04.2025

Please note that:

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

3.4 Submission of Statement of Compliance

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

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

3.5 Contact Information

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

Manager, Compliance (Ministerial Statements)

Department of Water and Environmental Regulation

Postal Address:	Locked Bag 10 Joondalup DC WA 6919
Phone:	(08) 6364 7000
Email:	compliance@dwer.wa.gov.au

3.6 Post Assessment Guidelines and Forms

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

3.7 Compliance Status Terms

Compliance status terms are provided in Table 1.

Table 1 Terms of Compliance

Compliance Status Terms	Abbreviation	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: • Ongoing requirements that have been met during the reporting period; and • Requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: • Audit elements have a finite period of application (e.g. construction activities, development of a document); • The action has been satisfactorily completed; and • The DWER has provided written acceptance of a 'completed' status for the audit element.
Not Required at this Stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-Compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalised its investigations to determine whether non-compliance has occurred.
Non-Compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or	The term 'In Process' may not be used for any purpose other than that stated in the Definition Column. The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g.

		the other government agency and assessment by the DWER or other government agency for approval is still pending.	implementation of a l management plan).

3.8 Compliance Audit Table

The Compliance Audit Table is provided in Appendix B.

The audit table has been prepared and maintained in accordance with the Office of the Environmental Protection Authority (OEPA)'s Post Assessment Guideline for Preparing an Audit Table (OEPA, 2012b). The 'Status Column' of the audit table accurately describes the compliance status of each implementation condition for the reporting period of this Statement of Compliance (24 January 2024 to 23 January 2025). The terms that have been used in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 above.

4 Details of Declared Compliance Status

4.1 Summary of Compliance

The project has not exceeded the extents or ranges defined in Condition 1 of MS 1180 (detailed in Appendix A). All physical elements were within the maximum extent/range and only one operational element was implemented for the reporting period and was also compliant.

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

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

4.2 Confirmed Environmental Management Plans & Procedures

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

Management Plans

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

Procedures

- Condition 11: Offsets – Confirmed Impact Reconciliation Procedure (PCF-PD-EN-IRP_Rev 1, 21 March 2022) (SCJV, 2022).
- Condition 15-1: Compliance Reporting – Compliance Assessment Plan (PCF-PD-EN-CAP_PCF1, 11 February 2022).

During this reporting period (January 2024-January 2025) these plans, or a revision thereof, were being implemented. Relevant revisions of Management Plans during this reporting period were submitted to DWER and are as follows:

- Confirmed Cultural Heritage Management Plan (PCF-PD-EN-CHMP_PCF8, 8 February 2024). Notification of Revised Management Plan send to DWER on 9 February 2024. Notification of Submission of Revised Management Plan send to DWER on 22 March 2024, stating that the revised Management Plan (PCF-PD-EN-CHMP_PCF8), has been in effect since 8 February 2024.
- The approved Threatened Species Management Plan (TSMP) (PCF-PDEN-TSMP, version PCF 5, 23 February 2022) was implemented during the reporting period. On the 7 February 2024, Perdaman revised the confirmed TSMP (PCF-PD-EN-TSMP, version PCF 6) on 18 December 2023 and submitted to DCCEEW (PUP_ACR2024-017), to include provision for night works. Comments by DCCEEW were addressed within PCF-PD-EN-TSMP PCF 7, 5 December 2024, and submitted to DCCEEW for final approval. DCCEEW approval of the TSMP (PCF-PD-EN-TSMP version PCF7; 5 December 2024) was obtained 24 January 2025, marking the implementation date of this version of the TSMP (outside of the CAR 2024-2025 reporting period). The approved version was sent to DWER for information and records only, on 29 January 2025.
- The Air Quality Management Plan (AQMP) was revised during the reporting period. The revision was submitted to DWER outside this reporting period on 17 March 2025. Implementation of the AQMP is not required until commencement of Operations.

4.3 Status of Compliance with Confirmed Environmental Management Plans

There were nine (9) Management Plans that were approved by the CEO in the 2022-2023 Reporting Period (CAR, 2023) (refer to section 4.2 above) or a revision thereof, which were being implemented on the Proposal during the 2024-2025 reporting period. Please note the Greenhouse Gas Management Plan was not in effect as the Proposal was not in the Operational phase. The AQMP has been revised during this reporting period and has been submitted to DWER on 17 March 2025 (outside the reporting period). The AQMP was not in effect as the Proposal was not in the Operational phase during the reporting period.

This section focuses on the implementation of the six (6) outcome and / or objective based management plans required by the MS conditions, which are presented in Tables 2 through Table 7:

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

In accordance with Condition 16 of the MS 1180, the following approved Management Plans are publicly available on the Perdaman Project Ceres Website https://www.perdamanindustries.com.au/environment/ :

- Greenhouse Gas Emissions Management Plan (PCF-PD-EN-GHGMP, PCF 5).
- Cultural Heritage Management Plan (PCF-PD-EN-CHMP, PCF8 (PUBLIC))
- Threatened Species Management Plan (PCF-PD-EN-TSMP, PCF 5).
- Impact Reconciliation Procedure (PCF-PD-EN-IRP, Rev 1)

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

The proponent has prepared implementation summaries for each management plan implemented during the reporting period which demonstrate compliance with the requirements and commitments of the plans that are required by conditions of MS1180.

Implementation Summaries:

- Attachment A.MS1180.IS_CAP
- Attachment B.MS1180.IS_GHMP
- Attachment C.MS1180.IS_FMP
- Attachment D.MS1180.IS_FaMP
- Attachment E.MS1180.IS_TSMP
- Attachment F.MS1180.IS_SWMP
- Attachment G.MS1180.IS_CHMP
- Attachment H.MS1180.IS_LMP
- Attachment I.MS1180.IS_IRP

Table 2 Status of Compliance of Confirmed Flora Management Plan

Condition Environmental Objective or Outcome Set in the Confirmed Management Plan	Reporting on the Outcomes and /or Objectives and management annually	Status
Key Environmental Factor: Flora & Vegetation MS1180 Confirmed Management Plan: Flora Management Plan		
Condition environmental Outcome 4-1 (1): the extent of native vegetation clearing within the development envelope shall not exceed 73.05 ha;	During the 2024-2025 reporting period, clearing of 15.36 ha of native vegetation has occurred, bringing the total cleared Native Vegetation to 72.00 ha. The Project remains compliant within the allowable clearing extend with approximately 1.05 ha still permitted to clear. Trigger Criteria 1 was exceeded during the reporting period, as the total extent of cleared native	Compliant.

	vegetation exceeded 65.75 ha. Trigger Criteria 3 was not exceeded during the reporting period. The clearing boundary was surveyed and identified with approved survey markers. Temporary fencing comprising star pickets and wire were installed.	
Condition environmental Outcome 4-1 (2): the extent of clearing within the vegetation community identified as Priority 1 (P1) Priority Ecological Community (PEC) - Burrup Peninsula Rock Pile Communities shall not exceed 0.16 ha.	During the 2024-2025 reporting period, clearing of 0.05 ha of the vegetation community identified as Priority 1 (P1) Priority Ecological Community (PEC) has occurred, bringing the total cleared P1 PEC to 0.15 ha. The remaining allowable clearing extend is 0.01 ha. The Project remains compliant within the allowable clearing extend with 0.01 ha still permitted to clear. Trigger Criteria 2 was exceeded during the reporting period, as the total extent of cleared vegetation community exceeded 0.144 ha. Trigger Criteria 3 was not exceeded during the reporting period. The clearing boundary was surveyed and identified with approved survey markers. Temporary fencing comprising star pickets and wire were installed. Trigger Criteria 3 was not exceeded during the reporting period. With surveying and pegging of P1 PEC conducted.	Compliant
Condition environmental Objective 4-2 (1): all direct impacts (other than the direct impacts authorised under condition 4-1) are avoided and minimise indirect impacts to native vegetation.	Achievement toward this environmental objective is managed through the Flora Management Plan Objective based provisions, which include the Management Actions and Targets for Flora. Achievement of the management actions and targets is monitored through various means, including environmental inspections, annual flora monitoring, incident reporting and GDP's. Compliance was assessed with the following Management Actions / Targets of the Plan associated with achieving this objective: • MA1 / FVM 1 • MA2 / FVM 2 • MA3 / FVM 3 • MA4 / FVM 4 • MA5 / FVM 5 • MA6 / FVM 6 • MA7 / FVM 7 • MA8 / FVM 8 • MA9 / FVM 9 • MA10 / FVM 10 • MA13 / FVM 13 • MA14 / FVM 14 • MA15 / FVM 15 • MA16 • MA17 / FVM 17 The following Management Actions / Targets of the Plan were not required or applicable during the	Compliant

	reporting period: • MA11 / FVM 11 • MA12 / FVM 12 The Following monitoring requirements of the Management Plan were met: • MON1 • MON2 • MON3 • MON4 • MON5 • MON6 • MON7

Table 3 Status of Compliance of Confirmed Fauna Management Plan

Condition Environmental Objective or Outcome Set in the Confirmed Management Plan	Reporting on the Outcomes and /or Objectives and management annually	Status
Key Environmental Factor: Terrestrial Fauna MS1180 Confirmed Management Plan: Fauna Management Plan		
Condition environmental Outcome 5-1 (1): clearing in the fauna habitat type identified as Rocky Outcrops shall not exceed 0.16 ha	During the 2023-2024 reporting period, clearing of 0.10 ha of Rocky Outcrops has occurred, leaving 0.06 ha of allowable clearing extent. During the 2024-2025 reporting period, clearing of 0.05 ha of fauna habitat identified as Rocky Outcrops has occurred, bringing the total cleared Rocky Outcrops habitat to 0.152 ha. The remaining allowable clearing extend is 0.01 ha. The Project remains compliant within the allowable clearing extent of 0.16 ha. During the reporting period, trigger criteria 2 has been reached (clearing exceeds 90%(0.144ha)). During the reporting period, the threshold criteria 2 has not been reached.	Compliant
Condition environmental Outcome 5-1 (2): clearing in the fauna habitat type identified as Hummock Grasslands on Mid-slopes shall not exceed 49.17 ha	During the 2023-2024 reporting period, clearing of 46.16 ha of Hummock Grasslands on the Mid-slopes has occurred, leaving 3.01 ha of allowable clearing extent. During the 2024-2025 reporting period, clearing of 2.63 ha of fauna habitat identified as Hummock Grassland has occurred, bringing the total cleared Hummock Grassland habitat to 48.79 ha. The remaining allowable clearing extend is 0.38 ha. The Project remains compliant within the allowable clearing extent of 49.17 ha. During the reporting period, the Trigger Criteria 3 has been reached (clearing exceeds 90% (44.25 ha)). During the reporting period, the threshold criteria 3 has not been reached.	Compliant

Condition environmental Outcome 5-1 (3): clearing in the fauna habitat type identified as Samphire Shrublands / Supratidal flats shall not exceed 11.97 ha;	During the 2023-2024 reporting period, clearing of 11.50 ha of Samphire Shrublands / Supratidal flats has occurred, leaving 0.47 ha of allowable clearing extend. During the 2024-2025 reporting period, clearing of 0.11 ha of fauna habitat identified as Samphire Shrublands / Supratidal flats has occurred, bringing the total cleared Samphire Shrublands / Supratidal flats habitat to 11.61 ha. The remaining allowable clearing extend is 0.36 ha. The Project remains compliant within the allowable clearing extent of 11.97 ha. During the reporting period, the Trigger Criteria 4 has been reached (clearing exceeds 90% (10.77 ha)). During the reporting period, the threshold criteria 4 has not been reached.	Compliant
Condition environmental Outcome 5-1 (4): clearing in the fauna habitat type identified as Drainage Lines shall not exceed 2.7 ha;	During the 2023-2024 reporting period, clearing of 2.41 ha of Drainage Lines has occurred, leaving 0.29 ha of allowable clearing extent. During the 2024-2025 reporting period, clearing of 0.14 ha of fauna habitat identified as Drainage Lines has occurred, bringing the total cleared Drainage Lines habitat to 2.55 ha. The remaining allowable clearing extent is 0.15 ha. The Project remains compliant within the allowable clearing extent within the 2.7 ha. During the reporting period, the Trigger Criteria 5 has been reached (clearing exceeds 90% (2.43 ha)). During the reporting period, the threshold criteria 5 has not been reached.	Compliant
Condition environmental Outcome 5-1 (5): impacts to short-range endemic fauna species are avoided, unless it is demonstrated, and the CEO confirms in writing that the species occurs in a self-sustaining population outside the development envelope.	Bennelongia conducted a SRE survey on behalf of the Proponent in 2022. 28 species of SRE groups were collected. Bennelongia concluded that based on the size of the Project area, what is known of the biology of the SRE Groups and the continuous connections of habitat inside the development envelope with similar habitat outside, it is likely that all species exist in self-sustaining populations outside the PDE. Therefore, it is unlikely that the Project development will have significant detrimental effect the conservation status of any species. With the exception of Chernetidae, which was identified within an area proposed for the laydown site within the PDE. However upon further sampling it was discovered that the species was found in minor drainage line that continued outside the PDE. In addition Bennelongia noted that the species could be assigned a species code of an intraspecific variation of this species which means it occurs outside of the development envelope. A Peer Review of the FaMP and the SRE Survey conducted by Bennelongia in 2022 was carried out by Invertebrate Solutions Pty Ltd on 6 May 2022. It was demonstrated to the CEO that the SRE populations were in a self-sustaining population outside the Development Envelope and would not be impacted by the proposed clearing extents under	Not Required.

	MS 1180.	
Condition environmental Objective 5-2 (1): minimise direct and indirect impacts to the northern quoll, Pilbara olive python and the ghost bat within the development envelope.	Achievement toward this environmental objective is managed through the Fauna Management Plan Objective based provisions, which include the Management Actions and Targets for Terrestrial Fauna. Achievement of the management actions and targets is monitored through various means, including environmental inspections, monitoring provisions, incident reporting, training and GDP's. The following Management Actions of the Plan associated with achieving this objective have been met: • MA1 • MA2 • MA3 • MA4 • MA5 • MA6 • MA6 • MA7 • MA8 • MA9 • MA10 • MA11 • MA12 • MA13 • MA17 • MA18 • MA19 The following Management Actions of the Plan were not required or applicable during the reporting period: • MA 20 • MA15	Compliant

Table 4 Status of Compliance of Confirmed Threatened Species Management Plan

Condition Environmental Objective or Outcome Set in the Confirmed Management Plan	Reporting on the Outcomes and /or Objectives and management annually	Status
Key Environmental Factor: Terrestrial Fauna MS1180 Confirmed Management Plan: Threatened Species Management Plan		
Condition environmental Outcome 5-1 (1): clearing in the fauna habitat type identified as Rocky Outcrops shall not exceed 0.16 ha	During the 2023-2024 reporting period, clearing of 0.10 ha of Rocky Outcrops has occurred, leaving 0.06 ha of allowable clearing extent. During the 2024-2025 reporting period, clearing of 0.05 ha of fauna habitat identified as Rocky Outcrops has occurred, bringing the total cleared Rocky Outcrops habitat to 0.152 ha.	Compliant

	The remaining allowable clearing extend is 0.01 ha. The Project remains compliant within the allowable clearing extent of 0.16 ha. During the reporting period, trigger criteria 2 has been reached (clearing exceeds 90%(0.144ha)). During the reporting period, the threshold criteria 2 has not been reached.	
Condition environmental Outcome 5-1 (2): clearing in the fauna habitat type identified as Hummock Grasslands on Mid-slopes shall not exceed 49.17 ha	During the 2023-2024 reporting period, clearing of 46.16 ha of Hummock Grasslands on the Mid-slopes has occurred, leaving 3.01 ha of allowable clearing extent. During the 2024-2025 reporting period, clearing of 2.63 ha of fauna habitat identified as Hummock Grassland has occurred, bringing the total cleared Hummock Grassland habitat to 48.79 ha. The remaining allowable clearing extend is 0.38 ha. The Project remains compliant within the allowable clearing extent of 49.17 ha. During the reporting period, the Trigger Criteria 3 has been reached (clearing exceeds 90% (44.25 ha)). During the reporting period, the threshold criteria 3 has not been reached.	Compliant
Condition environmental Outcome 5-1 (3): clearing in the fauna habitat type identified as Samphire Shrublands / Supratidal flats shall not exceed 11.97 ha;	During the 2023-2024 reporting period, clearing of 11.50 ha of Samphire Shrublands / Supratidal flats has occurred, leaving 0.47 ha of allowable clearing extend. During the 2024-2025 reporting period, clearing of 0.11 ha of fauna habitat identified as Samphire Shrublands / Supratidal flats has occurred, bringing the total cleared Samphire Shrublands / Supratidal flats habitat to 11.61 ha. The remaining allowable clearing extend is 0.36 ha. The Project remains compliant within the allowable clearing extent of 11.97 ha. During the reporting period, the Trigger Criteria 4 has been reached (clearing exceeds 90% (10.77 ha)). During the reporting period, the threshold criteria 4 has not been reached.	Compliant
Condition environmental Outcome 5-1 (4): clearing in the fauna habitat type identified as Drainage Lines shall not exceed 2.7 ha;	During the 2023-2024 reporting period, clearing of 2.41 ha of Drainage Lines has occurred, leaving 0.29 ha of allowable clearing extent. During the 2024-2025 reporting period, clearing of 0.14 ha of fauna habitat identified as Drainage Lines has occurred, bringing the total cleared Drainage Lines habitat to 2.55 ha. The remaining allowable clearing extent is 0.15 ha. The Project remains compliant within the allowable clearing extent within the 2.7 ha. During the reporting period, the Trigger Criteria 5 has been reached (clearing exceeds 90% (2.43 ha)). During the reporting period, the threshold criteria 5 has not been reached.	Compliant

Condition environmental Outcome 5-1 (5): impacts to short-range endemic fauna species are avoided, unless it is demonstrated, and the CEO confirms in writing that the species occurs in a self-sustaining population outside the development envelope.	Bennelongia conducted a SRE survey on behalf of the Proponent in 2022. 28 species of SRE groups were collected. Bennelongia concluded that based on the size of the Project area, what is known of the biology of the SRE Groups and the continuous connections of habitat inside the development envelope with similar habitat outside, it is likely that all species exist in self-sustaining populations outside the PDE. Therefore, it is unlikely that the Project development will have significant detrimental effect the conservation status of any species. With the exception of Chernetidae, which was identified within an area proposed for the laydown site within the PDE. However upon further sampling it was discovered that the species was found in minor drainage line that continued outside the PDE. In addition Bennelongia noted that the species could be assigned a species code of an intraspecific variation of this species which means it occurs outside of the development envelope. A Peer Review of the FaMP and the SRE Survey conducted by Bennelongia in 2022 was carried out by Invertebrate Solutions Pty Ltd on 6 May 2022. It was demonstrated to the CEO that the SRE populations were in a self-sustaining population outside the Development Envelope and would not be impacted by the proposed clearing extents under MS 1180.	Not Required.
Condition environmental Objective 5-2 (1): minimise direct and indirect impacts to the northern quoll, Pilbara olive python and the ghost bat within the development envelope.	Achievement toward this environmental objective is managed through the Threatened Species Management Plan Objective based provisions, which include the Management Actions, triggers and thresholds for Threatened Species relevant to the Project. Achievement of management actions, triggers and thresholds is monitored through various means, including environmental inspections, monitoring provisions, incident reporting and GDP's. The following Management Actions, thresholds criteria of the Plan, were non-compliant: • MA 14 and Threshold 14 The following Management Actions / triggers and thresholds of the Plan associated with achieving this objective have been met: • MA1 – Trigger Criteria 1 & Threshold Criteria 1 • MA2 – Trigger Criteria2 & Threshold Criteria 2 • MA3 – Trigger Criteria 3 & Threshold Criteria 3 • MA4 – Trigger Criteria 4 & Threshold Criteria 4 • MA5 – Trigger Criteria 5 & Threshold Criteria 5 • MA6 – Trigger Criteria 6 & Threshold Criteria 6 • MA7 – Trigger Criteria 7 & Threshold Criteria 7 • MA9 – Trigger Criteria 9 & Threshold Criteria 9	Compliant

- MA10 – Trigger Criteria 10 & Threshold Criteria 10
- MA12 – Trigger Criteria 12 & Threshold Criteria 12
- MA13 –– Trigger Criteria 13 & Threshold Criteria 13
- Trigger Criteria 14
- MA15 – Trigger Criteria 15 & Threshold Criteria 15
- MA16 – Trigger Criteria 16 & Threshold Criteria 16
- MA17 – Trigger Criteria 17 & Threshold Criteria 17
- MA18 – Trigger Criteria 18 & Threshold Criteria 18
- MA19
- MA20 – Trigger Criteria 20 & Threshold Criteria 20
- MA21 – Trigger Criteria 21 & Threshold Criteria 21
- MA23
- MA24
- MA26 - Trigger Criteria 26
- MA28
- MA30 - Trigger Criteria 30 & Threshold Criteria 30
- MA31 - Trigger Criteria 31 & Threshold Criteria 31
- MA33 - Threshold Criteria 33
- MA34 – Threshold 34
- MA35
- MA36 - Trigger Criteria 36
- MA37 - Threshold Criteria 37
- MA39 - Trigger Criteria 39 & Threshold Criteria 39
- MA41 - Trigger Criteria 41 & Threshold Criteria 41
- MA42 - Trigger Criteria 42 & Threshold Criteria 42
- MA44 - Threshold & Trigger Criteria 44
- MA46 - Trigger Criteria 46 & Threshold Criteria 46
- MA47 - Trigger Criteria 47 & Threshold Criteria 47

The following Management Actions, triggers and thresholds of the Plan were not required or applicable during the reporting period:

- MA8 – Trigger Criteria 8 & Threshold Criteria 8
- MA11 – Trigger Criteria 11 & Threshold

	Criteria 11 • Trigger Criteria 19 & Threshold Criteria 19 • MA22 –– Trigger Criteria 22 & Threshold Criteria 22 • Trigger Criteria 23 & Threshold Criteria 23 • Trigger Criteria 24 • MA25 –– Trigger Criteria 25 & Threshold Criteria 25 • MA27 – Trigger Criteria 27 • Threshold Criteria 28 • MA29 - Threshold Criteria 29 • MA32 - Trigger Criteria 32 & Threshold Criteria 32 • Trigger Criteria 35 & Threshold Criteria 35 • MA38 - Trigger Criteria 38 & Threshold Criteria 38 • MA40 - Trigger Criteria 40 & Threshold Criteria 40 • MA43 - Trigger Criteria 43 & Threshold Criteria 43 • MA44 - Trigger Criteria 44 & Threshold Criteria 44 • MA45 - Trigger Criteria 45 & Threshold Criteria 45

Table 5 Status of Compliance of Confirmed Surface Water Management Plan

Condition Environmental Objective/Outcome Set in the Confirmed Management Plan	**Reporting on the Outcomes / Objectives and management annually**	**Status**
Key Environmental Factor: Inland Waters MS1180 Confirmed Management Plan: Surface Water Management Plan		
Condition environmental Objective 8-1 (1) (set as an outcome in the SWMP): maintain the hydrological regimes and quality of surface water so that environmental values are protected. Condition environmental Objective 6-1 (1): Minimise project attributable impacts on groundwater quality, flow direction and/or depth to maintain the hydrological regimes and quality of groundwater and surface water so that environmental values are protected.		
Trigger Criterion 1 Presence of backwater or ponding of water from the edge of the development envelope over a period of two consecutive days from the date ponding was identified at distances further than 6 m.	During the reporting period, there were no events causing this trigger to be exceeded.	Compliant
Threshold Criterion 1 Presence of backwater or ponding	During the reporting period, there were no events causing this threshold to be exceeded.	Compliant

of water from the edge of the development envelope over a period of two consecutive days from the date ponding was identified at distances further than 10 m.			
Trigger Criterion 2: Exceedance of Surface Water quality trigger levels (refer to Table 1-4 in SWMP). Threshold Criterion 2: Exceedance of Surface Water quality threshold levels (refer to Table 1-4 in SWMP).	The status for Trigger and Threshold Criterion 2 has been noted as potentially non-compliant in line with the Terms of Compliance noted in Table 1. There is no indication that water quality criteria have been exceeded and the potential non-compliance is due to the investigation to determine whether non-compliance has occurred not being finalised at the time of reporting, as described below. Ten surface water monitoring events were conducted during the 2024–25 reporting period, triggered by rainfall events that resulted in surface water presence. Monitoring was not undertaken during dry months (January, February, May, July, September, October, November, and December), in accordance with SWMP provisions which require sampling only when water is present and safe to access. At each monitoring event, field parameters (pH, EC, turbidity) were recorded and reviewed in accordance with the SWMP. Surface water locations SW1–SW6 were not sampled during the reporting period due to the absence of ponded water. These sites represent upstream ephemeral drainage lines and remained dry throughout the year, as confirmed by aerial imagery and site inspections. During Cyclone Sean (January 2025), sediment basins at Site F overtopped and discharge occurred from Site C through erosion and sediment controls. Field sampling was undertaken at downstream locations WQ2, WQ3, SWDC2, and SWDC3. Field parameters collected from these sites were reviewed and found to be within SWMP thresholds. While pH levels exceeded 8.5 within the Site F basin, downstream values remained compliant, and no evidence of environmental harm was observed. However, laboratory analysis of the collected samples was not undertaken during this event, representing a procedural deviation from the Confirmed SWMP, which requires laboratory analysis following discharge events. This omission was due to a breakdown in internal processes during a staff transition period. Although laboratory analysis was not completed, field results and visual assessments indicated that surface water values were protected, consistent with MS1180 Condition 8-1. No visual signs of hydrocarbons, foam, discolouration, odour, or other indicators of water quality degradation were recorded at any monitoring locations. Corrective actions have been identified and	Potentially Non-compliant	

	include updated monitoring checklists, clearer procedures within the site inspection system, and staff training to ensure future compliance with laboratory sampling requirements during discharge events.	
Trigger Criterion 3 Groundwater quality trigger criteria. Threshold Criterion 3 Groundwater quality threshold criteria.	The status for Trigger and Threshold Criterion 3 has been noted as potentially non-compliant in line with the Terms of Compliance noted in Table 1. There is no indication that water quality criteria have been exceeded and the potential non-compliance is due to the investigation to determine whether non-compliance has occurred not being finalised at the time of reporting, as described below. The groundwater monitoring bores established during early project phases were decommissioned in October and November 2023 to enable bulk earthworks and infrastructure construction. No replacement bores were installed during the 2024–25 reporting period, and therefore formal groundwater level and quality monitoring was not undertaken as outlined in the Confirmed SWMP. It is noted that Condition 6-3 of MS1180 requires the proponent to monitor groundwater levels and quality only “in the event that the studies referred to in condition 6-2 indicate that dewatering would be required during construction.” As no dewatering (as defined under relevant approvals) was required or undertaken during construction, and the Hydrogeological Assessment prepared under Condition 6-2 confirmed that dewatering would not be necessary, monitoring against trigger and threshold criteria was not explicitly mandated under MS1180 during the construction phase. However, the baseline hydrological report prepared for the project specifies that groundwater quality monitoring should occur every six months throughout construction, and the SWMP requires quarterly sampling during this phase. These obligations were not fulfilled during the reporting period, due to a misinterpretation that groundwater monitoring applied only during operational phases or in the presence of dewatering impacts. Limited groundwater sampling was undertaken at a single retained bore, BH22, one of the original monitoring bores for the project. BH22 is located upgradient of active construction areas and is considered hydrologically separated from any potential project-related impacts, making it representative of background conditions. Water quality data from BH22 was collected at a frequency greater than that required by the Confirmed Plans. The proponent is finalising plans for the installation of a new groundwater monitoring network, to be completed by July 2025. Monitoring of groundwater levels and quality will resume in accordance with the Confirmed Plans. A governance review is also underway to strengthen environmental monitoring planning	Potentially Non-compliant

	during construction phases and prevent recurrence of similar gaps.		
Trigger Criterion 4 Continuous increasing trend and/or continuous decreasing trend in the Depth to groundwater (mBTOC and mAHD). Threshold Criterion 4 Continuous increasing/decreasing trend of >12 months.	The status for Trigger and Threshold Criterion 4 has been noted as potentially non-compliant in line with the Terms of Compliance noted in Table 1. There is no indication that there has been a continuous increasing or decreasing trend in depth to groundwater and the potential non-compliance is due to the investigation to determine whether non-compliance has occurred not being finalised at the time of reporting, as described below. Groundwater level trends could not be assessed during the 2024–25 reporting period due to the absence of an operational site-wide monitoring network. The majority of project groundwater bores were decommissioned in late 2023 to facilitate construction activities, and no replacement bores were installed during the reporting period. Limited water level data was collected from BH22, an original monitoring bore retained for background tracking. However, BH22 is situated upgradient of the Project Development Envelope and is hydrologically separated from construction areas. As such, it is not suitable for identifying trends or impacts across the broader project area and cannot be relied upon to assess Trigger/Threshold Criterion 4 (i.e., continuous increasing/decreasing trends over 12 months). Despite the lack of formal trend data, no groundwater abstraction or dewatering occurred, and construction activities did not include works likely to influence groundwater levels, direction, or quality. There is no evidence of project-related impacts to groundwater levels or hydrological. As such, the intent of Trigger/Threshold Criterion 4 and the environmental protection objective under Condition 6-1(1): to maintain hydrological regimes and protect groundwater environmental values, was met during the reporting period.	Potentially compliant	Non-
Condition environmental Objective 8-1 (1): maintain the hydrological regimes and quality of surface water so that environmental values are protected.	During the 2024–25 reporting period, surface water hydrological regimes and quality were maintained, and there is no evidence of environmental values being adversely impacted. While a non-compliance occurred with respect to laboratory analysis of surface water samples (as required under MA3), field parameters (pH, EC, turbidity, visual inspections) were consistently monitored during ten rainfall-triggered events. These results showed no exceedances of thresholds, and no indicators of contamination, hydrocarbons, or nutrient-related pollution were recorded. Importantly, no discharge occurred from the Site C sediment basin, and only one controlled discharge event from Site F occurred during Cyclone Sean, which was managed via environmental controls. Corrective actions are underway to address the minor procedural gap in laboratory sampling,	Potentially Compliant	Non-

	including updated inspection templates and staff training. On this basis, the environmental objective under Condition 8-1(1) has been met. The following management actions and operational practices contributed to the protection of surface water values: • Diversion channels and erosion controls were installed and maintained • Clearing activities were supported by fauna and erosion protocols, avoiding key habitat and erosion-prone areas • Spill management, inspections, and pre-rainfall controls were implemented • The site's stormwater design, drainage strategy, and inspection regimes have been adapted for the construction phase and will be further strengthened in readiness for commissioning and operations. The following Management Actions / Targets of the Plan were implemented and are associated with achieving this objective: • MA1 • MA3 • MA5 • MA6 • MA7 • MA8 • MA9 • MA11 • MA12 • MA13 • MA14 • MA15 • MA16 • MA17 • MA18 • MA19 • MA20	
Condition environmental Objective 6-1 (1): Minimise project attributable impacts on groundwater quality, flow direction and/or depth to maintain the hydrological regimes and quality of groundwater and surface water so that environmental values are protected.	The following Management Actions / Targets of the Plan associated with achieving this objective: • MA2 – Groundwater Baseline: Compliant • MA4 – Groundwater Monitoring: potentially non-compliant Baseline groundwater monitoring was completed prior to construction, with five rounds of sampling undertaken across the full	Potentially Non-Compliant with MA4

	monitoring bore network (Sites C and F). However, during the 2024–25 reporting period, groundwater monitoring was not implemented in accordance with MA4 due to the decommissioning of all but one bore (BH22), and no replacement bores were installed. As a result, site-wide water levels and quality data were not collected. Limited monitoring was conducted at BH22, which is located upgradient and hydrologically separated from the active construction footprint. Results indicated no evidence of groundwater quality deterioration attributable to construction activities. While isolated elevated nitrate levels were observed, these are under investigation and considered unrelated to project works. Despite the monitoring gap, no project-related groundwater extraction occurred, and no construction activities were undertaken that could plausibly alter groundwater levels, flow direction, or quality. On this basis, the environmental objective of Condition 6-1(1), to protect groundwater values, is considered to have been met.	

Table 6 Status of Compliance of Confirmed Cultural Heritage Management Plan

Condition Environmental Objective Set in the Confirmed Management Plan	Reporting on the Objectives and management Targets annually	Status
Key Environmental Factor: Social Surroundings MS1180 Confirmed Management Plan: Cultural Heritage Management Plan		
Condition environmental Objective 9-1 (1): avoid, where possible, and otherwise minimise direct and indirect impacts to social, cultural, heritage, and archaeological values within and surrounding the development envelope.	The following Management Actions and Targets of the Plan associated with achieving this objective have been met: • MA 1 / CHM TARGET 1 • MA 2 / CHM TARGET 2 • MA3 / CHM TARGET 3 • MA 4 / CHM TARGET 4 • MA 5 / CHM TARGET 5 • MA 6 / CHM TARGET 6 • MA 7/ CHM TARGET 7 • MA 8 / CHM TARGET 8 • MA 11 / CHM TARGET 11 • MA 13 / CHM TARGET 13 • MA 14 / CHM TARGET 14 • MA 15 • MA 16 • MA 17 / CHM TARGET 17 • MA 18 / CHM TARGET 18 • MA 19 / CHM Target 19	Compliant

	• MA 20 • MA 21 / CHM TARGET 21 (both PCF 6 and PCF 8) • MA 23 / CHM TARGET 23 • MA 24 / CHM TARGET 24 • MA 25 / CHM TARGET 25 • MA 26 / CHM TARGET 26 • MA 31 / CHM TARGET 31 The following Management Actions and Targets of the Plan associated with achieving this objective have not been required, not started or are not applicable during the Reporting Period: • MA 9 / CHM TARGET 9 • MA 10 / CHM TARGET 10 • MA 12 / CHM TARGET 12 • CHM TARGET 20 • MA 22 / CHM TARGET 22 • MA 27 / CHM TARGET 27 • MA 28 / CHM TARGET 28 • MA 29 / CHM TARGET 29 • MA 30 / CHM TARGET 30 The following Management Actions of the Plan and Targets of the Plan associated with achieving this objective have not been met during the Reporting Period: • CHM Target 15 • CHM Target 16 There were no direct and indirect impacts associated with the non-achievement of these Targets, and therfore the objective was still achieved during the reporting period.	
Condition environmental Objective 9-1 (2): allow ongoing Traditional Owner and Custodian access to enable traditional activities and connection to culturally significant areas within and surrounding the development envelope as shown in Figure 2;	The following Management Actions and Targets of the Plan associated with achieving this objective have been met during the reporting period: • MA 9 / CHM TARGET 9 • MA 27 / CHM TARGET 27	Compliant
Condition environmental Objective 9-1 (3): allow Traditional Owner and Custodian access to the development envelope following decommissioning of the proposal as shown in Figure 2;	The following Management Actions and Targets of the Plan associated with achieving this objective have not been applicable or required during the Reporting Period: • MA 28 / CHM TARGET 28	Not Required
Condition environmental Objective 9-1 (4): avoid, where possible, and otherwise minimise direct and indirect impacts to visual and amenity impacts to social and	The following Management Actions and Targets of the Plan associated with achieving this objective have not been applicable or required during the Reporting Period: • MA 27 / CHM TARGET 27	Compliant

cultural places and activities.	• MA 9 / CHM TARGET 9 The following Management Actions and Targets of the Plan associated with achieving this objective have not been met during the reporting period, however no heritage harm has occurred due to the deviation from the target and reports were provided to EPA/DPLH: • CHM TARGET 15 • CHM TARGET 16 The non-achievement of the targets 15 and 16 did not cause the environmental objective to not be met. Following investigation, no direct or indirect impacts have occured. The following Management Actions and Targets of the Plan associated with achieving this objective have been met during the reporting period: • CHM TARGET 31

Table 7 Status of Compliance of Confirmed Light Management Plan

Condition	Environmental Objective Set in the Confirmed Management Plan	Reporting on the management Targets annually	Objectives and	Status
Key Environmental Factor: Social Surroundings MS1180 Confirmed Management Plan: Light Management Plan				
Condition environmental Objective 10-1 (1): avoid, where possible, and otherwise use best practice technology and risk-based management actions to minimise nightglow and light overspill from the Project so that the environmental values of amenity at sensitive locations, including, but not limited to Hearson Cove and Deep Gorge, are protected		The following Management Actions and Targets of the Plan associated with achieving this objective have been complied with during the reporting period. • MA 1 / LMP TARGET 1 • MA 2 / LMP TARGET 2 • MA 5 / LMP TARGET 5 • MA 6 / LMP TARGET 6 The following Management Actions and Targets of the Plan associated with achieving this objective have not been required, not started or are not applicable during the Reporting Period: • MA 3 / LMP TARGET 3 • MA 4 / LMP TARGET 4 • MA 7 / LMP TARGET 7		Compliant

5 Supporting / Verifying Information

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

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

Key pieces of valuable information for the assessment of the implementation of MS 1180 conditions are referenced in Appendix B and within each of the management plans implementation summaries (Attachments A through I) and are provided separately in electronic format. A list of the evidence reference in the CAR Audit Table is provided in Appendix C. It should be noted that further supporting evidence is documented and should it be required can be provided on request.

6 Other Information

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

7 Changes to the CAP

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

8 Appendices

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

Table 8 Appendix A - MS 1180 Compliance Table Condition 1

Proposal Element	Description	Status	Further Information
Physical Elements			
Development envelope (Site C & F)	Maximum extent or range of clearing 106.7 ha	C	There has been no change to the approved Development Envelope extent. Evidence Figures provided (2025.1180.M1a.i and 2025.1180.M1a.ii).
Disturbance footprint (Site C & F)	Maximum extent or range of clearing 73.05 ha. Avoiding Cultural Heritage Sites IDs 9439, 26008, 9296, and MAC 004.	C	2025.1180.M1b Native Vegetation clearing undertaken within the development envelope is 72.00 Ha. 2025.1180.M1c shows avoidance of Cultural Heritage Sites IDs 9439, 26008, 9296, and MAC 004.
Laydown Area (Site F)	Maximum extent or range of clearing 6.8 ha (temporary and episodic use).	C	Maximum extent of clearing within Laydown Area (Site F) is within the 6.80 Ha range. 2025.1180.M1d Ground Disturbance Permit (GDP04).
Utility Block (Site C)	Power generation (installed Combined Cycle Gas Turbine - 100MW capacity and installed solar - 3.5MW capacity.	NR	Operations to commence approximately 5 years after commencement of Ground Disturbance Activities (GDA).
Operational Elements			
Urea Production Plant	6,200 t/day	NR	Operations to commence approximately 5 years after commencement of GDA.
Ammonia Plant	3,500 t/day	NR	Operations to commence approximately 5 years after commencement of GDA.
Saline water discharge	20GL/yr. (including excess treated wastewater) discharged into the existing Water Corporation Multi-User Brine Return Line.	NR	Operations to commence approximately 5 years after commencement of GDA.
Product storage areas	Urea (plant site): 75, 000 t capacity, fully enclosed shed. Urea (Dampier Port site): 75, 000 t capacity, fully enclosed shed.	NR	Operations to commence approximately 5 years after commencement of GDA.
Urea shiploading system	Loading capacity of 2,200 t/h	NR	Operations to commence approximately 5 years after

			commencement of GDA.
Causeway	Culvert outflow velocities of less than 1.0 m/s	C	Causeway construction has been completed. Culvert outflow velocities of less than 1.0 m/s have been met. 2025.1180.M1f
Timing Elements			
Project life	Up to 80 years from the date of MS 1180.	NR	2103

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

B. Appendix B - Compliance Audit Table

Note:

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the Minister's Statement for full detail/precise wording of individual elements.
- Code prefixes: M = Minister's condition, P = Proponent's commitment.
- Acronyms list: CEO = Chief Executive Officer of DWER; DAWE = Commonwealth Department of Water and the Environment; DCCEEW = Department of Climate Change, Energy, Environment and Water; DBCA = Department of Biodiversity, Conservation and Attractions; DPLH = Department of Planning, Lands and Heritage; DMIRS = Department of Mining, Industry Regulation and Safety; DWER = Department of Water and Environmental Regulation; EPA = Environmental Protection Authority; DoH = Department of Health; Minister for Env = Minister for the Environment.
- Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non – compliant, NR = Not Required at this stage. Please note the terms VR = Verification Required and IP = In Process are only for OEPA use.

<table>
<tr><th>Audit Code</th><th>Subject</th><th>Requirement</th><th>How</th><th>Evidence</th><th>Phase</th><th>Timeframe</th><th>Status</th><th>Further Information</th></tr>
<tr>
<td>1180: M1</td>
<td>Limitations and extent of proposal</td>
<td>When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents or ranges:
<table>
<tr><th>Proposal element</th><th>Location</th><th>Maximum extent or range</th></tr>
<tr><td colspan="3">Physical elements</td></tr>
<tr><td>Development envelope (Site C and F)</td><td>Figures 1, 2, 3 & 4</td><td>106.7 ha</td></tr>
<tr><td>Disturbance</td><td>Figures 1,</td><td>73.05 ha.</td></tr>
</table>
</td>
<td>Physical extents - Through implementation of Ground Disturbance Permit Procedure (45826-HSE-PL-G-1024_GDP).

See Appendix B – Compliance Assessment with Condition 1 in CAP.

Fill out the Table 6-1 (Appendix B Template) in CAP and provide compliance status of each element extent and or limit (Key Characteristics of the Proposal) and any further information required to explain compliance.</td>
<td>2025.1180.M1a.i
2025.1180.M1a.ii
2025.1180.M1b (Final Clearing Extent)
2025.1180.M1c
2025.1180.M1d
2025.1180.M1e_GDP04
2025.1180.M1f</td>
<td>Overall</td>
<td>For life of the Project.</td>
<td>C</td>
<td>Refer to Appendix A for details of compliance against each part in the table.</td>
</tr>
</table>

Audit Code	Subject	Requirement			How	Evidence	Phase	Timeframe	Status	Further Information
		footprint (Site C and F)	2, 3 & 4	Avoiding Cultural Heritage Sites IDs 9439, 26008, 9296, and MAC 004.						
		Laydown Area (Site F)	Figure 2	6.8 ha (temporary and episodic use).						
		Utility Block (Site C)		Power generation (installed Combined Cycle Gas Turbine – 100 MW capacity and installed solar – 3.5 MW capacity).						
		Operational elements								
		Urea production plant	Figure 2	6,200 t/day						
		Ammonia plant	Figure 2	3,500 t/day						
		Saline water discharge		20 GL/yr. (including excess treated wastewater) discharged into the existing Water Corporation Multi-User Brine Return Line.						

Audit Code	Subject	Requirement			How	Evidence	Phase	Timeframe	Status	Further Information
		Product storage areas	Figure 2	Urea (plant site): 75,000 t capacity, fully enclosed shed. Urea (Dampier Port site): 75,000 t capacity, fully enclosed shed.						
		Urea shiploading system	Figure 2	Loading capacity of 2,200 t/h						
		Causeway	Figure 2	Culvert outflow velocities of less than 1.0 m/s						
		Timing elements								
		Project life		Up to 80 years from date of this Statement						
Air Quality Management										
1180: M2.1	Air quality management	The proponent shall ensure that implementation of the proposal achieves the following environmental outcome: (1) ensure that no air emissions from the proposal have an adverse impact accelerating the weathering of rock art within Murujuga beyond natural rates.			Implement proposal pursuant to condition 2-1 of MS 1180.	2025.1180.M2.1a_ Landside CEMP Rev 4 2025.1180.M2.1b_ Landside CEMP Rev 3 2025.1180.M2.1c_ Portside CEMP Rev 0	Overall	For life of the Project.	NR	The proponent notes, that to measure any adverse impact accelerating the weathering of rock art within Murujuga beyond natural rates would require the results of the Murujuga Rock Art Monitoring Program which have not been completed during the reporting period. Therefore the Proponent

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								can only measure compliance against this condition by reviewing the management strategies and controls in place during construction that aim to minimise air emissions that may impact rock art. The SCJV implement an Construction Environmental Management Plan (CEMP) that has been prepared to include relevant management controls that ensure that condition 2-1 is met during construction, by managing construction related emissions (i.e. dust from clearing, dust from bulk earthworks). During the reporting period, (Landside) CEMP Rev4 was implemented from the 17 May 2024 and previous to that Rev 3. Table 6-1 of the CEMP includes dust management controls. The Portside CEMP (Rev0) has been implemented from 24 May

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								2024. Works at the port commenced on 27 November 2024.
1180: M2.2	Air quality management	If: (1) the Minister notifies the proponent, for the purposes of this condition, of one or more air quality standards (including standards derived from the results of the Murujuga Rock Art Monitoring Program); and (2) the proponent complies with all those standards, and any amendments to the standards which are the subject of a notification to the proponent by the Minister for the purposes of this condition, the proponent is taken to have achieved the outcome specified in condition 2-1.	Comply with air quality standards including standards derived from the Murujuga Rock Art Monitoring Program, and any amendments to those standards.	Not Applicable	Overall	When / If the Minister notifies the Proponent.	NR	(1) During the reporting period the Minister has not notified the proponent of one or more air quality standards (including standards derived from the results of the Murujuga Rock Art Monitoring Program. (2) During the reporting period this part of condition 2.1 has not applied to the Project.
1180: M2.3	Air quality management	Not more than six months prior to the planned Commencement of Operations, or such greater time approved in writing by the CEO, the proponent shall submit to the CEO and the DAWE a revised version of the Perdaman Urea Project Environmental Management Plan Air Quality (Final Version PCF 2, 25 March 2021) (Air Quality Management Plan), which is prepared in consultation with the Murujuga Aboriginal Corporation and shall: (1) set out measures that will be taken to achieve each of the following outcomes and objectives: (a)subject to condition 2-2, compliance with the environmental outcome in condition 2-1(1), specifically that no air emissions from the proposal have an adverse impact accelerating the	Update the AQMP to address all requirements of Condition 2-3 and resubmit the Air Quality Management Plan to the CEO and the DAWE. The Proponent is to prepare and submit for approval by the CEO EPA an Air Quality Management Plan not more than 6 months prior to the planned commencement of operations. The AQMP is to include all elements as specified in Condition 2-3. Submit the Confirmed AQMP t\o DCCEEW within 10 days of	Not Applicable	Pre-Operations	Not more than six months prior to the planned Commencement of **Operations**, or such greater time approved in writing by the CEO	NR	Submission of the revised version of the Perdaman Urea Project Environmental Management Plan Air Quality (Final Version PCF 2, 25 March 2021) (Air Quality Management Plan), is not required until six (6) months prior to Operations commencing. A revision of the AQMP was not submitted within the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		weathering of rock art within Murujuga beyond natural rates; (b)compliance with all air quality objectives and standards (including those derived from the results of the Murujuga Rock Art Monitoring Program), and any amendments to those objectives and standards, which are the subject of a notification to the proponent by the Minister for the purposes of condition 2-2 and/or condition 2-7(3); and (c)seek to maintain regional air quality in accordance with the National Environment Protection (Ambient Air Quality) Measure by the minimisation of air emissions from the proposal. (2) be informed by monitoring data collected before Commencement of Operations which establishes a scientifically valid and robust baseline (the methodology for which has been subject to a peer review by an independent person or independent persons with suitable technical experience on the suitability of the methodology used to gather the baseline data) that is sufficient to measure whether the environmental outcome specified in condition 2-1(1) and the environmental outcomes and objectives specified in condition 2-3(1) have been achieved; (3) specify all of the expected air emissions from the proposal and their sources based on the air pollution control technology selection and plant design for the proposal at the time operations are	approval by CEO EPA (EPBC Approval Condition 6).					

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		proposed to commence and at the time of any review of the plan; (4) include a comparison of the expected air emissions for the proposal against international industry best practice for urea production facilities at the time operations are proposed to commence (or at the time of any future review of the plan); (5) include a comparison of the air pollution control technology selection and plant design for the proposal against international industry best practice for urea production facilities at the time operations are proposed to commence (or at the time of any future review of the plan); (6) identify and describe the measures that the proponent will implement to minimise all air emissions, including the adoption of advances in air pollution control technology and process management since the date of this Statement (or since the date of the last plan review), to ensure that these are consistent with international industry best practice at the time of plan commencement or review, and specify: (a) the timeframe within which each measure will be implemented; and (b) the method to determine the effectiveness of each measure in minimising air emissions; (7) include provisions for monitoring and reporting to the CEO at least annually of: (a) all air emissions produced by the proposal;						

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(b) on-site meteorological conditions including wind speed / direction, temperature, and rainfall rate; (c) ambient ground level concentrations for air emissions that have the potential to impact on human health, amenity, and rock art; (d)the implementation of measures required to be included in the Air Quality Management Plan by conditions 2-3(1)–(13); and (e) any exceedance of trigger criteria and threshold criteria; (8) include provisions requiring the Air Quality Management Plan to be amended in any future reviews to incorporate updated management actions; (9) include a trajectory of proposed air emission reductions for the life of the proposal; (10) specify scientifically valid and robust: (a) trigger criteria that will trigger the implementation of management and/or contingency actions (including changes to operations and reductions in emissions) to prevent non-compliance with the Air Quality Management Plan and to ensure that the outcome in condition 2-1 and outcomes and objectives in condition 2-3(1) will be achieved; (b) threshold criteria that will demonstrate that the outcome in condition 2-1(1) and outcome and objectives in condition 2-3(1) are being achieved;						

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(c) Adaptive monitoring program to determine if trigger criteria and threshold criteria have been met; (d) management and/or contingency actions (including changes to operations and reductions in emissions) to be implemented if the trigger criteria required by condition 2-3(10)(a) and/or the threshold criteria required by condition 2-3(10)(b) are exceeded; (11) include a report of a peer review carried out by an independent person or independent persons with suitable technical experience to review the final draft of the Air Quality Management Plan before it is submitted to the CEO as it relates to each of the items in condition 2-3(10) and to report on the adequacy of that content to achieving the outcome in condition 2-1(1) and outcome and objectives in condition 2-3(1); (12) provide the format and timing for the reporting to the CEO of monitoring results against trigger criteria and threshold criteria over the reporting period in the Compliance Assessment Report required by condition 15-6; and (13) subject to the peer reviews identified in conditions 2-3(2) and 2-3(11), set out reasons for selection or adoption of the measures, criteria, monitoring program and management and/or contingency actions included in the Air Quality Management Plan, including discussion of other options considered.						

AUDIT TABLE

PROPOSAL: Perdaman Urea Project

STATEMENT: 1180

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M2.4	Air quality management	The proponent must not undertake the Commencement of Operations until the CEO has confirmed in writing that the Air Quality Management Plan submitted under condition 2-3 addresses the requirements of condition 2-3.	Provide evidence to the CEO to demonstrate the AQMP addresses requirements of condition 2-3 of MS1705. Correspondence in writing from the CEO that AQMP meets requirements of condition 2-3.	Not Applicable	Pre-Operations	Not more than six months prior to the planned Commencement of **Operations**, or such greater time approved in writing by the CEO	NR	The Proponent has not commenced Operations during the reporting period. The CEO has not confirmed in writing that the Air Quality Management Plan addresses the requirements of condition 2-3. Therefore, this condition is not applicable during the reporting period.
1180: M2.5	Air quality management	The proponent shall implement the most recent version of the Confirmed Air Quality Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcome in condition 2-1(1) and outcome and objectives detailed in condition 2-3(1) have been met.	Implementation of the most recent version of the Confirmed AQMP. Written Correspondence with CEO and DWER.	Not Applicable	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the condition 2-1(1) and outcome and objectives detailed in condition 2-3(1) have been met.	NR	During the reporting period there has been no recent version of the Confirmed Air Quality Management Plan implemented. A confirmation letter from the department approving the Air Quality Management Plan [PCF2] has not been issued to the Proponent. The current version remains as mentioned in the MS1180 (condition 2-3) as the PCF-PD-EN-AQMP_PCF2 updated by Cardno (25/03/2021).

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								In accordance with the MS1180 condition 2-3 the AQMP must be revised and submitted to the CEO and DCCEEW not more than six months prior to the commencement of operations.
1180: M2.6	Air quality management	In the event that monitoring or investigations at any time indicate an exceedance of trigger criteria or threshold criteria specified in the Confirmed Air Quality Management Plan, the proponent shall: (1) report the exceedance in writing to the CEO within: (a) 48 hours of an exceedance of threshold criteria being identified; or (b) 7 days of an exceedance of trigger criteria being identified. (2) implement the management and/or contingency actions required by the Confirmed Air Quality Management Plan within seven days of the exceedances being reported or such lesser time specified in the Confirmed Air Quality Management Plan, and continue implementation of those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the trigger criteria and/or threshold criteria are being met and implementation of the management and/or contingency actions are no longer required; (3) investigate to determine the cause of the trigger criteria or threshold criteria being exceeded;	Written Correspondence to the CEO within the required timeframes. a) **48 hours** of an exceedance of threshold criteria being identified; or b) **7 days** of an exceedance of trigger criteria being identified Correspondence to include: • Report of contingency/management actions, preventative measures implemented • Effectiveness of applied management and contingency actions. • Findings of any investigations carried out.	Not Applicable	Overall	Report the exceedance in writing to the CEO within: (a) 48 hours of an exceedance of threshold criteria being identified; or (b) 7 days of an exceedance of trigger criteria being identified	NR	The Proposal has not implemented a Confirmed Air Quality Management Plan during the reporting period. Submission of the revised version of the Perdaman Urea Project Environmental Management Plan Air Quality (Final Version PCF 2, 25 March 2021) (Air Quality Management Plan), is not required until six (6) months prior to Operations commencing. Operations have not commenced during the reporting period. This condition is not applicable.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(4) if threshold criteria have been exceeded, investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded; (5) provide a further report to the CEO within 21 days of the exceedance being reported which shall include: (a) details of management and/or contingency actions implemented; (b) the effectiveness of the management and/or contingency actions implemented against the trigger criteria or threshold criteria; (c) the findings of the investigations required by conditions 2-5(3) and 2-5(4); (d) measures to prevent the trigger criteria or threshold criteria being exceeded in the future; (e) measures to prevent, control or abate impacts which may have occurred; and (f) justification for the trigger criteria or threshold criteria remaining, or being adjusted based on better understanding, demonstrating that the outcomes in condition 2-1(1) and outcomes and objectives in condition 2-3(1) will be met.	• Further measures to prevent future exceedances • Justifications if trigger and/or threshold values remain the same. Written correspondence from CEO that it has been demonstrated that trigger criteria and/or threshold criteria are being met and implementation of the management and/or contingency actions are no longer required.					
1180: M2.7	Air quality management	Without limiting condition 2-5 (implementation of the plan), and notwithstanding compliance with condition 2-6 (response to exceedance), the proponent must not cause or allow: (1) an exceedance of a threshold criteria specified in a Confirmed Air Quality	Implement proposal to uphold threshold and trigger values pursuant to AQMP and MRAS requirements. Report contingency/management actions, preventative measures	Not Applicable	Overall	Operational phase.	NR	The Proposal has not implemented a Confirmed Air Quality Management Plan during the reporting period. The Proposal has not commenced Operations.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		Management Plan (regardless of whether management actions and/or threshold contingency actions have been or are being implemented); (2) any non-compliance with the requirements of a Confirmed Air Quality Management Plan; or (3) any non-compliance with any air quality objectives and standards (including those derived from the results of the Murujuga Rock Art Monitoring Program), and any amendments to those objectives and standards, which are the subject of a notification to the proponent by the Minister for the purposes of this condition.	and justifications if trigger and/or threshold values are exceeded.					This condition is not applicable during the reporting period.
1180: M2.8	Air quality management	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review, and submit proposed amendments to, the Confirmed Air Quality Management Plan to the CEO and the DAWE; and (2) shall review, and submit proposed amendments to, the Confirmed Air Quality Management Plan to the CEO and the DAWE as and when directed by the CEO; (3) shall review and submit proposed amendments to the Confirmed Air Quality Management Plan to the CEO and the DAWE within six months of being notified by the Minister of air quality standards or objectives (including those derived from the results of the Murujuga Rock Art Monitoring Program) or any amendments to those objectives or standards, for the purposes of condition 2-2 or condition 2-7(3);	Revise, update and resubmit the AQMP to the CEO and DAWE with any proposed amendments. If the CEO and the DAWE request, revise, update and resubmit the AQMP to the CEO and DAWE with any proposed amendments. Revise, update and resubmit the AQMP to the CEO and DAWE within six months of being notified by the Minister of air quality standards or objectives (including those derived from the results of the Murujuga Rock Art Monitoring Program) or any amendments to those objectives or standards, for the purposes of	Not Applicable	Overall	(2) When directed by the CEO; (3) within 6 months of being notified by the Minister of air quality objectives or any amendments to those objectives; (4) review and amend (where required) the confirmed AQMP at least every 5 years.	NR	During the reporting period there was no Confirmed Air Quality Management Plan, therefore there were no revisions and submissions of proposed amendments to the Confirmed AQMP. This condition is not applicable during the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(4) shall review and submit proposed amendments to the Confirmed Air Quality Management Plan to the CEO and the DAWE at least every five years.	condition 2-2 or condition 2-7(3). Revise and resubmit the AQMP to CEO and DAWE every 5 years (at least). Any revisions will be consulted with MAC.					
1180: M2.9	Air quality management	Any changes to the Confirmed Air Quality Management Plan under condition 2-8 that involves an item that was subject to a peer review under conditions 2-3(2) or 2-3(11) will require a new peer review unless otherwise advised by the CEO.	Engage independent persons with suitable technical experience to conduct peer review of AQMP under conditions 2-3(2) or 2-3(11).	Not Applicable	Overall	Throughout Proposal Implementation	NR	During the reporting period there was no Confirmed Air Quality Management Plan. Therefore, there were no changes made under condition 2-8 that would be subject to a peer review. This condition is not applicable during the reporting period.
1180: M2.10	Air quality management	The proponent shall interpret and report on monitoring data collected for the purposes of the Confirmed Air Quality Management Plan to the CEO and the Murujuga Aboriginal Corporation at least annually.	Prepare a written report with all Air Quality monitoring data that has been collected along with associated interpretation of results for the CEO and MAC.	Not Applicable	Overall	At least annually for the life of the Project.	NR	During the reporting period there was no Confirmed Air Quality Management Plan. Therefore, there has been no monitoring data collected for the purposes of the Confirmed Air Quality Management Plan.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								This condition is not applicable during the reporting period.
Greenhouse Gas Management								
1180: M3.1	Greenhouse gas management plan	Subject to condition 3-2, the proponent shall take measures to ensure that Net GHG Emissions do not exceed: (1)3,250,000 tonnes of CO2-e for the period until 30 June 2029; (2)2,600,000 tonnes of CO2-e for the period between 1 July 2029 and 30 June 2034; (3)1,950,000 tonnes of CO2-e for the period between 1 July 2034 and 30 June 2039; (4)1,300,000 tonnes of CO2-e for the period between 1 July 2039 and 30 June 2044; (5)650,000 tonnes of CO2-e for the period between 1 July 2044 and 30 June 2049; and in any event; and (6)zero tonnes of CO2-e for every five-year period from 1 July 2049 onwards.	Implement best-practice technology relevant to urea production and monitor results every 5 years from the commencement of operations. Conduct reviews on available technology and Proposal progress toward 5-yearly limits. GHGMP provides details of reduction and abatement measures taken to meet Net GHG Emission limits over the 5-yearly periods. Prepare an annual report which for the previous year specifies: • The quantity of **Proposal GHG Emissions** and urea produced; and • The **Emissions Intensity** for the proposal Prepare report to CEO and MAC specifying for the 5-year period: • the quantity of **Proposal GHG Emissions**;	Not Applicable	Overall	Throughout the Proposal Life. Periods between proposal commencement and 30 June 2029; between 1 July 2029 and 30 June 3034; 1 July 3034 and 30 June 2039; 1 July 2039 and 30 June 2044; 1 July 2044 and 30 June 2049; and every 5 years from 1 July 2049 onwards.	NR	The reporting period sits within the period as per condition 3-1(1) *"for the period until 30 June 2029"* The Project has not commenced operations during the reporting period, therefore there have been no GHG emissions from the urea production technology measured. Therefore, to date, GHG emissions have not exceeded the 3,250,000 tonnes of CO2-e. This condition is not applicable during the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
			• the **Net GHG Emissions**; Reports will aid with tracking compliance against limit targets.					
1180: M3.2	Greenhouse gas management plan	Where the time between the Commencement of Operations and the end of a period specified in condition 3-1 is less than five years, the Net GHG Emissions limit for that period is to be determined in accordance with the following formula: Reduced Net GHG Emissions limit = (A ÷ 1825) x B Where: A is the Net GHG Emissions limit for the period as specified in condition 3-1. B is the number of days between the Commencement of Operations and the end of the relevant period specified in condition 3-1.	Use the formula: Reduced Net GHG Emissions limit = (A ÷ 1825) x B, to specify the Net GHG Emissions between the time of commencement of operations and 30 June 2029, if this time frame is less than 5 years.	Not Applicable	Overall		NR	The Project has not commenced operations during the reporting period, therefore there have been no GHG emissions from the urea production technology measured.
1180: M3.3	Greenhouse gas management plan	At least six months prior to Ground Disturbing Activities, or such lesser time approved in writing by the CEO, the proponent shall, in consultation with the Murujuga Aboriginal Corporation, revise, and submit to the CEO, the Perdaman Urea Project Environmental Management Plan Greenhouse Gas Emissions (Final Version PCF2, 12 March 2021) to: (1) be consistent with the achievement of the Net GHG Emissions limits in condition 3 1 subject to the adjustment provided for in condition 3-2 (or achievement of emission reductions beyond those required by those emission limits);	Update the GHGMP to address all requirements of Condition 3-3 and resubmit the Greenhouse Gas Management Plan to the CEO. Update and revise plan in consultation with MAC.	2025.1180.M3.3a (Letter from DWER approving the GHGMP and noting it meets the requirements of condition 3) 2025.1180.M3.3b(Letter to DCCEEW stating ground disturbance commenced 11 July 2023)	Pre-construction	At least six months prior to Ground Disturbing Activities, or such lesser time approved in writing by the CEO	CLD	The Greenhouse Gas Emissions Management Plan (PCF-PD-EN-GHGMP) was submitted to the CEO on 4 March 2022. Consultation with MAC is detailed in section 10 of the GHGMP (PCF 5) (approved confirmed version). Ground Disturbance commenced on the 11 July 2023 (refer to

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(2) specify the estimated Proposal GHG Emissions and Emissions Intensity for the life of the proposal; (3) include a comparison of the estimated Proposal GHG Emissions and Emissions Intensity for the life of the proposal against other comparable facilities; (4) identify and describe any measures that the proponent will implement to avoid, reduce and/or offset (including offsets located in Murujuga and/or with Traditional owners who identify and associate themselves with Murujuga) Proposal GHG Emissions and/or reduce the Emissions Intensity of the proposal; and (5) provide a program for the future review of the plan to: (a) assess the effectiveness of measures referred to in condition 3 3(4); and (b) identify and describe options for future measures that the proponent may or could implement to avoid, reduce, and/or offset Proposal GHG Emissions and/or reduce the Emissions Intensity of the proposal.						evidence 2025.1180.M3.3c).
1180: M3.4	Greenhouse gas management plan	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1)may revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan at any time; (2)must revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan if there is a material risk that condition 3-1 will not be	Through written correspondence to DWER for submission of plans to CEO. Revise, update and resubmit the GHGMP to the CEO with any proposal changes or material risk of condition 3-1 not being complied with.	Not Applicable	Overall	At any time during the proposal implementation, construction and operations for the life of the Project.	NR	There have been no revisions of the confirmed GHGMP required by condition 3.4 (1), (2), (3) or (4) during the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		complied with, including but not limited to as a result of a change to the proposal; (3)must revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan by the date that the first five yearly consolidated report is required to be submitted under condition 3-9(1) and every five years after that date; and (4)must revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan as and when directed to by the CEO.	Revise, update and resubmit the GHGMP to the CEO at any time. Revise, update and resubmit the GHGMP to the CEO by the 31st March 2030 and every five years following that date. Revise, update and resubmit the GHGMP to the CEO when CEO advises to do so. Consult with MAC on all changes to GHGMP. Consultations to occur face to face where required.			Five yearly reviews and resubmissions to occur as follows: 31 March 2030; 31 March 2035; 31 March 2040; 31 March 2045; 31 March 2050.		
1180: M3.5	Greenhouse gas management plan	The proponent must not undertake the commencement of Ground Disturbing Activities until the CEO has confirmed in writing that the Greenhouse Gas Management Plan referred to in condition 3-3 has been revised and satisfies the requirements of condition 3-3.	Written correspondence that GHGMP meets requirements of condition 3-3 prior to any ground disturbance works commencing.	2025.1180.M3.5a (Letter to DCCEEW stating ground disturbance commenced 11 July 2023). 2025.1180.M3.3a (Letter from DWER approving the GHGMP and noting it meets the requirements of condition 3)	Pre-construction	Prior to ground disturbing activities, unless otherwise agreed by the CEO.	CLD	Ground Disturbance commenced on the 11 July 2023. (2025.1180.M3.5a) DWER approved the GHGMP Version PCF 5 on 17 May 2022, stating that the Greenhouse Gas Emissions Management Plan meets the requirements of Condition 3 of Ministerial Statement 1180 (2025.1180.M3.5b). Confirmed GHGMP was approved by the DWER 14 months prior to GDA commencing.

AUDIT TABLE

PROPOSAL: Perdaman Urea Project

STATEMENT: 1180

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M3.6	Greenhouse gas management plan	Within one month of receiving confirmation in writing from the CEO that: (1) the Greenhouse Gas Management Plan referred to in condition 3-3 has been revised and satisfies condition 3-3; or (2) any subsequent version of the Confirmed Greenhouse Gas Management plan submitted under condition 3-4 satisfies condition 3-3, the proponent must submit a separate summary of the relevant plan to the CEO for public disclosure, which must: (3) include a summary of the matters specified in conditions 3-3(1) to 3-3(4); and (4) be published as required by condition 3-11(2).	Written correspondence of confirmation from CEO that plan satisfies condition 3-3. Prepare a separate summary of the GHGMP that can be publicly disclosed. Publish the approved, revised version of the GHGMP Summary.	NA	Overall	Within one month of receiving Confirmation in writing from the CEO	NR	This condition has not been required during the reporting period. The GHGMP has been published and was done outside this reporting period, in 2023.
1180: M3.7	Greenhouse gas management plan	The proponent shall implement the most recent version of the Confirmed Greenhouse Gas Management Plan until the CEO has confirmed by notice in writing that it has been demonstrated that the Net GHG Emissions limits in condition 3-1 have been met.	Implementation of the most recent version of the Confirmed GHGMP. Written Correspondence with CEO and DWER that the Proposal has demonstrated that the Net GHG Emissions limits in condition 3-1 have been met .	2025.1180.M3.3a (Letter from DWER approving the GHGMP and noting it meets the requirements of condition 3) Attachment B.MS1180.IS_GHGMP	Overall	Throughout the Proposal Life until the Net GHG Emissions limits in condition 3-1 have been met.	NR	During the reporting period, the most recent version of the Confirmed GHGMP was the approved version PCF 5 (17 May 2022). The management actions within this GHGMP are not required to be implemented until operations (refer to Attachment B.MS1180.IS_GHGMP) During the reporting period the CEO has not

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								confirmed by notice in writing that it has been demonstrated that the Net GHG Emissions limits in condition 3-1 have been met. This condition is not required during the reporting period.
1180: M3.8	Greenhouse gas management plan	The proponent shall submit an annual report to the CEO and the Murujuga Aboriginal Corporation, each year by 31 March, commencing on the first 31 March after the Commencement of Operations, or such other date within that financial year as is agreed by the CEO to align with other reporting requirements for GHG, specifying for the previous financial year: (1) the quantity of Proposal GHG Emissions and urea produced; and (2) the Emissions Intensity for the proposal.	Prepare and submit an annual report to the CEO and MAC each year by 31st March following commencement of operations. Written correspondence. Written correspondence where another date within that financial year as is agreed by the CEO to align with other reporting requirements for GHG.	Not Applicable	Overall	Annually by 31 March, commencing on the first 31 March after the Commencement of Operations, or such other date within that financial year as is agreed by the CEO.	NR	During the reporting period operations have not commenced. This condition is not applicable during the reporting period.
1180: M3.9	Greenhouse gas management plan	The proponent shall submit to the CEO and the Murujuga Aboriginal Corporation, by 31 March 2030 or such other date within that financial year as is agreed by the CEO to align with other reporting requirements for GHG, and every fifth year thereafter: (1) a consolidated report specifying: (a) for each of the preceding five financial years, the matters referred to in conditions 3-8(1) and (2);	Prepare a consolidated report for CEO and MAC. Report the quantity and emission intensity of GHG emissions from the proposal, including the type, quantity, identification or serial number and date of retirement or cancellation of any Authorised Offsets (with evidence in writing) which have been used	Not Applicable	Overall	By 31 March 2030 or such other date within that financial year as is agreed by the CEO.	NR	The report required by this condition is due on the 31 March 2030, which falls outside of the reporting period. This condition is not applicable during the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(b) for the period specified in condition 3-1 that ended on 30 June of the year before the report is due: i. the quantity of Proposal GHG Emissions; ii. the Net GHG Emissions; iii. the type, quantity, identification or serial number, and date of retirement or cancellation of any Authorised Offsets which have been retired or cancelled and which have been used to calculate the Net GHG Emissions referred to in condition 3-9(1)(b)ii, including written evidence of such retirement or cancellation; and iv. any measures that have been implemented to avoid or reduce Proposal GHG Emissions; (2) an audit and peer review report of the consolidated report required by condition 3-9(1), carried out by an independent person or independent persons with suitable technical experience dealing with the suitability of the methodology used to determine the matters set out in the consolidated report, whether the consolidated report is accurate and whether the consolidated report is supported by credible evidence.	to calculate Net GHG emissions, in addition to any measures implemented to reduce GHG emissions by an independent person with suitable technical experience. Engage an independent person or independent persons with suitable technical experience to conduct Peer Review of the consolidated report. Written correspondence.					
1180: M3.10	Greenhouse gas management plan	A consolidated report referred to in condition 3-9(1) must be accompanied by: (1) a revision of the Confirmed Greenhouse Gas Management Plan under condition 3-4(3); and (2)a separate summary report, for the period specified in condition 3-1 that ended on 30 June of the year before the	Prepare the Consolidated Report and Submit to CEO ad MAC. Revise and resubmit the current version of the GHGMP. Prepare a separate summary report for the period that ended	Not Applicable	Overall	By 31 March 2030 or such other date within that financial year as is agreed by the CEO.	NR	The report required by condition 3-9(1) is not due until the 31 March 2030, which falls outside of the reporting period. This condition is not applicable during the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		report is due and any previous periods specified in condition 3-1, and which includes: (a) a graphical comparison of Net GHG Emissions with the Net GHG Emissions limits detailed in condition 3-1 (subject to the adjustment provided for in condition 3-2); (b) proposal Emissions Intensity compared to comparable facilities; © a summary of measures to reduce the Proposal GHG Emissions undertaken by the proponent for compliance periods detailed in condition 3-1; and (d) a clear statement as to whether limits for Net GHG Emissions set out in condition 3-1 have been met, and whether future Net GHG Emissions limits are likely to be met, including a description of any reasons why those limits have not been, and/or are unlikely to be met.	on 30 June 2029 and for every 5-year period thereafter (as specified in condition 3-1). Conduct a comparison of emission intensity compared to comparable facilities to report in the summary report. Prepare graphical comparisons of Net GHG Emissions with Net Emission limits. Prepare a summary of measures that will be and have been applied to reduce GHG Emissions. Determine and report on whether limits to Net emissions are likely to be met, including a description of reasons as to why they have not/are likely not to be met.			Every five years after 31 March 2030 – 31 March 2035; 31 March 2040; 31 March 2045; 31 March 2050.		
1180: M3.11	Greenhouse gas management plan	The proponent shall make the Confirmed Greenhouse Gas Management Plan, the summary of that plan, and all reports required by this condition 3 publicly available on the proponent's website within the timeframes specified below for the life of the proposal, or in any other manner or time specified by the CEO: (1)any Confirmed Greenhouse Gas Management Plan, within two weeks of receiving written confirmation from the CEO as referred to in condition 3-5;	Publish the approved, revised and current version of the GHGMP within **two weeks** of written correspondence and confirmation from the CEO. Publish the current and previous versions of the Summary of any GHGMP within two weeks of the Summary being submitted to the CEO.	2025.1180.M3.11a https://www.perdamanindustries.com.au/wp-content/uploads/2023/05/PCF-PD-EN-GHGMP_PCF5.pdf 2025.1180.M3.3a (Letter from DWER approving the GHGMP and noting it meets the	Overall	For the Life of the Proposal. Publish the most current approved GHGMP, Summary, annual report and consolidated reports on the Proponent's	C	The Confirmed GHGMP uploaded to the Proponent website on 10 May 2023 (outside the reporting period) remains on the website during this reporting period. During this reporting period, there has been no revised confirmed management plan submitted to the CEO and or written confirmation

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(2)the summary of any Confirmed Greenhouse Gas Management Plan referred to in condition 3-6 and the reports referred to in conditions 3-8, 3-9, and 3-10 within two weeks of submitting the document to the CEO.	Publish the current and previous versions of the Annual reports and Consolidated Reports within two weeks of submitting the reports to the CEO.	requirements of condition 3)		Project Website within 2 weeks of them being approved in writing by CEO.		from the CEO in accordance with Part (1) of this condition, therefore Part (1) is not applicable during this reporting period (see evidence column for last reporting period). Part 2 of the condition referring to the reports required in condition 3-8, 3-9 and 3-10 is not applicable during the reporting period as these reports have not been required during the reporting period.
Flora and Vegetation Management								
1180: M4.1	Flora and vegetation	The proponent shall implement the proposal to meet the following environmental outcomes: (1) the extent of native vegetation clearing within the development envelope shall not exceed 73.05 ha; and (2) the extent of clearing within the vegetation community identified as Priority 1 (P1) Priority Ecological Community (PEC) – Burrup Peninsula Rock Pile Communities shall not exceed 0.16 ha.	Implementation of the approved Confirmed Flora Management Plan. Defined triggers and thresholds to measure compliance with this condition. Implementation of the Ground Disturbance Permit Procedure (45826-HSE-PL-G-1024_GDP). GIS Mapping with defined Clearing boundaries and extents.	2025.1180.M4.1a (Final Clearing Extent) 2025.1180.M4.1b (GDP Clearing Assessment)	Overall	For the life of the Project	C	During the reporting period the total clearing carried out (since clearing commenced on 11 July 2023) has been 72.00 ha of native vegetation. The clearing of native vegetation has not exceeded 73.05 ha as allocated by the outcome in condition 4-1(1). Total Rock Pile Communities cleared to date, inclusive of the reporting period is 0.152 ha.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								The outcome in condition 4-1(2) has been met during the reporting period.
1180: M4.2	Flora and vegetation	The proponent shall implement the proposal to achieve the following environmental objective: (1) all direct impacts (other than the direct impacts authorised under condition 4-1) are avoided and minimise indirect impacts to native vegetation.	Implementation of the approved Confirmed Flora Management Plan (FMP). Implementation of the Ground Disturbance Permit Procedure (45826-HSE-PL-G-1024_GDP).	Please see Attachment C.MS1180.IS_FMP	Overall	For the life of the Project.	C	Annual vegetation and weed monitoring is conducted each year, to ensure direct impacts are avoided and minimise indirect impacts to native vegetation. In November 2024, Trace Ecology undertook this. The preliminary advice has received, with the final report currently under review and expected to be finalised by Trace Ecology which is expected in May 2025. Refer to the FMP implementation summary in Attachment C.MS1180.IS_FMP.
1180: M4.3	Flora and vegetation	At least six months prior to Ground Disturbing Activities, or such lesser time approved in writing by the CEO, the proponent shall submit to the CEO and the DAWE, a revised version of the Flora Management Plan, Urea Project Burrup Peninsula, Western Australia (Version PCF 1, 12 January 2021) which has been prepared in consultation with the Murujuga Aboriginal Corporation and meets the requirements of condition 4-7.	Revise and update the current version of the FMP to address all requirements within condition 4-7 and submit the FMP to CEO and DAWE at least 6 months prior to commencement of ground disturbance. Submission through DWER.	2025.1180.M4.3 (Submission of the revised FMP). NB: evidence is a letter from DWER stating the date the FMP was provided to them.	Pre-construction	At least six months prior to Ground Disturbing Activities, or such lesser time approved in writing by the CEO	CLD	The Proponent the requirements of this condition to be completed. A revised FMP was Submitted to DWER & DAWE (now DCCEEW) on 21 February 2022 (PCF3) outside this reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
			Consult with MAC, in person meeting and consultation. Written evidence of meeting and correspondence with MAC. Written correspondence through the DWER with CEO and DAWE on approval status of FMP.					
1180: M4.4	Flora and vegetation	The proponent must not commence Ground Disturbing Activities until the CEO has confirmed in writing that the Flora Management Plan submitted under condition 4-3 satisfies the requirements of condition 4-7.	Written correspondence that FMP meets requirements of condition 4-7 prior to any ground disturbance works commencing.	2025.1180.M4.4 (Written correspondence from CEO advising that the FMP satisfies Condition 4-7 and ground disturbance can commence).	Pre-construction	Prior to ground disturbing activities, unless otherwise agreed by the CEO.	CLD	The Proponent the requirements of this condition to be completed. Written correspondence from CEO advising that the FMP (PCF3) satisfies Condition 4-7 was provided on the 11 March 2022. Ground Disturbance commenced 11 July 2023.
1180: M4.5	Flora and vegetation	The proponent shall implement the most recent version of the Confirmed Flora Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcomes in condition 4-1 and objectives detailed in condition 4-2 have been met.	Written correspondence from the CEO through the DWER that the proposal has demonstrated environmental outcomes in condition 4-1 and objectives detailed in condition 4-2 have been met.	Attachment C.MS1180.IS_FMP	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 4-1 and 4-2 has been met.	C	During the reporting period the Proponent has implemented the most recent approved version of the Confirmed FMP (PCF3). Refer to the Attachment C.MS1180.IS_FMP that verify implementation of management actions within the plan.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								The CEO has not confirmed by notice in writing that the proponent has demonstrated that the environmental outcomes in condition 4-1 and objectives detailed in condition 4-2 have been met.
1180: M4.6	Flora and vegetation	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review and revise a Confirmed Flora Management Plan and submit it to the CEO and the DAWE; and (2) shall review and revise a Confirmed Flora Management Plan and submit it to the CEO and the DAWE as and when directed by the CEO.	Consultation with MAC when revisions to the FMP are made. Written correspondence. Revised version of the FMP will be prepared in consultation with MAC and submitted to CEO and DAWE.	Not Applicable	Overall	As required by the Proponent or as directed, requested by the CEO or DAWE.	NR	(1) During the reporting period there have been no revisions made. (2) During the reporting period, the CEO has not directed the proponent to review and revise the Confirmed FMP. This condition is not applicable during the reporting period.
1180: M4.7	Flora and vegetation	Any revision of the Flora Management Plan, Perdaman Urea Project Burrup Peninsula, Western Australia (Version PCF 1, 12 January 2021) or a Confirmed Flora Management Plan submitted to the CEO shall: (1) demonstrate how the outcomes in condition 4-1 and the objective in condition 4-2 will be achieved; (2) include provisions to manage impacts from: (a) clearing; (b) changes to surface water flows, including increase and decrease in extent of flooding;	Any revisions of the FMP submitted to the CEO must meet the condition requirements.	2025.1180.M4.4 (Written correspondence from CEO advising that the FMP satisfies Condition 4-7).	Overall	Any time there is a revision of the FMP or Confirmed FMP.	NR	No further revisions of the Confirmed Flora Management Plan have been made during the reporting period. The confirmed FMP (PCF 3) satisfies the requirements of condition 4-7 as evidenced by the letter from DWER (on the CEO's behalf) dated 11 March 2022. (2025.1180.M4.4).

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(c) changes to surface water quality; (d) changes to groundwater regimes; (e) dust; (f) weeds; and (g) fire; (3) provide for relevant traditional owners to be invited to observe any Ground Disturbing Activities and during construction, and take reasonable steps to facilitate the observation of those activities by those persons; (4) specify trigger criteria that will trigger the implementation of management and/or contingency actions to prevent direct or indirect impacts to the vegetation communities listed in conditions 4-1(1) and 4-1(2); (5) specify threshold criteria to demonstrate compliance with condition 4-1 and condition 4-2; (6) specify monitoring methodology to determine if trigger criteria and threshold criteria have been met; (7) specify management and/or contingency actions to be implemented if the trigger criteria required by condition 4-7(4) and/or the threshold criteria required by condition 4-7(5) have not been met; and (8) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that conditions 4-1 and 4-2 have been met over the reporting period in the Compliance Assessment Report required by condition 15-6.						

AUDIT TABLE

PROPOSAL: Perdaman Urea Project

STATEMENT: 1180

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M4.8	Flora and vegetation	In the event that the environmental outcomes in condition 4-1 are exceeded, or monitoring or investigations at any time indicate an exceedance of threshold criteria specified in a Confirmed Flora Management Plan, the proponent shall: (1) report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified; (2) implement the management and/or contingency actions required by condition 4-7(7) within seven days of the exceedances being reported as required by condition 4-8(1) or such lesser time set out in the Confirmed Flora Management Plan and continue implementation of those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the threshold criteria are being met and implementation of the management and/or contingency actions are no longer required; (3) investigate to determine the cause of the threshold criteria being exceeded; (4) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded; (5) provide a further report to the CEO and the DAWE within 21 days of the exceedance being reported as required by condition 4-8(1), which shall include: (a) details of the management and/or contingency actions implemented;	Initial written correspondence to the CEO and the DAWE within the required timeframes. a) Within **Seven days** of an exceedance of threshold criteria being identified; or Written correspondence to CEO and the DAWE that the management and contingency actions to be implemented within seven days of the exceedance being identified. Written correspondence from CEO that it has been demonstrated that trigger criteria and/or threshold criteria are being met and implementation of the management and/or contingency actions are no longer required. Written correspondence in the form of a report to the CEO and DAWE within 21 days of exceedance being identified to include: • Report of contingency/management actions, preventative measures implemented. • Effectiveness of applied management and contingency actions.	Attachment C.MS1180.IS_FMP	Overall	Report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified; (2) implement the management and/or contingency actions required by condition 5-3(8) within seven days of the exceedances being reported as required by condition 5-6(1).	NR	During the reporting period, there were no exceedances of threshold criteria identified that are specified in the Confirmed FMP and no exceedances to the environmental outcomes in condition 4-1. This condition has not been triggered during the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(b) the effectiveness of the management and/or contingency actions implemented against the threshold criteria; (c) the findings of the investigations required by conditions 4-8(3) and 4-8(4); (d) measures to prevent the threshold criteria being exceeded in the future; (e) measures to prevent, control or abate the environmental harm which may have occurred; and (f) justification of the threshold criteria remaining, or being adjusted based on better understanding, demonstrating that outcomes will continue to be met.	• Findings of any investigations carried out. • Further measures to prevent future exceedances. • Measures to prevent, control or abate the environmental harm which may have occurred. • Justifications if trigger and/or threshold values remain the same or being adjusted.					
1180: M4.9	Flora and vegetation	Without limiting condition 4-5 (implementation of the plan) and notwithstanding compliance with condition 4-8 (response to exceedance), the proponent must not cause or allow: (1) a failure to implement one or more management and/or contingency actions, if the relevant threshold criteria have been exceeded; (2) the exceedance of a threshold criteria (regardless of whether management and/or contingency actions have been or are being implemented), and/or (3) failure to comply with the requirements of the Confirmed Flora Management Plan.	Written correspondence.	Attachment C.MS1180.IS_FMP	Overall	Life of the Project.	C	(1) and (2) During the reporting period there have been no exceedances of threshold criteria specified in the Confirmed FMP requiring implementation of management and/or contingency actions. (3) During the reporting period there have been no non-compliances with the requirements of the Confirmed Flora Management Plan.
Terrestrial Fauna Management								
1180: M5.1	Terrestrial fauna management	The proponent shall implement the proposal to meet the following environmental outcomes:	Implementation of the approved Confirmed Fauna Management Plan.	2025.1180.M5.1. (Final Clearing Allocations for habitat types).	Overall	For the life of the Project.	C	(1) During the reporting period the accumulated (2023-2025) clearing in Rocky Outcrops was 0.152ha, which is less than allocated 0.16ha.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(1) clearing in the fauna habitat type identified as Rocky Outcrops shall not exceed 0.16 ha; (2) clearing in the fauna habitat type identified as Hummock Grasslands on Mid-slopes shall not exceed 49.17 ha; (3) clearing in the fauna habitat type identified as Samphire Shrublands / Supratidal flats shall not exceed 11.97 ha; (4) clearing in the fauna habitat type identified as Drainage Lines shall not exceed 2.7 ha; and (5) impacts to short-range endemic fauna species are avoided, unless it is demonstrated, and the CEO confirms in writing that the species occurs in a self-sustaining population outside the development envelope.	Implementation of the approved Threatened Species Management Plan. Defined triggers and thresholds to measure compliance with this condition 5-1. Implementation of the Ground Disturbance Permit Procedure (45826-HSE-PL-G-1024_GDP). GIS Mapping with defined Clearing boundaries and extents of fauna habitat.					(2) During the reporting period the accumulated (2023-2025) clearing in fauna habitat type identified as Hummock Grasslands on the Mis-Slopes was 48.79 ha, which is less than the allocated 49.17 ha. (3) During the reporting period the accumulated (2023-2025) clearing fauna habitat type identified as Samphire Shrublands was 11.61 ha, which is less than the allocated 11.97 ha. (4) During the reporting period the accumulated (2023-2025) clearing in the habitat type identified as Drainage Lines was 2.55 ha, which is less than the allocated 2.7 ha. Condition 5-1(5) remains not applicable during the reporting period as the Proponent has demonstrated that short-range endemic fauna species occur in self-sustaining populations outside the development envelope.

AUDIT TABLE

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M5.2	Terrestrial fauna management	The proponent shall implement the proposal to achieve the following environmental objective: (1) minimise direct and indirect impacts to the northern quoll, Pilbara olive python and the ghost bat within the development envelope.	Implementation of the approved Confirmed Fauna Management Plan (FaMP). Implementation of the approved Threatened Species Management Plan (TSMP).	Attachment E.MS1180.IS_TSMP Attachment D.MS1180.IS_FaMP 2025.1180.M5.2a (Fauna Trapping and Translocation Schedule). 2025.1180.M5.2b (Copy of PR25_BIO_Fauna RegisterOriginalFormat_2024). 2025.1180.M5.2c (Threatened Species Risk Assessment Report (GHD 2023)).	Overall	For the life of the Project.	C	The Proponent ensures achievement of this environmental objective through implementation of the confirmed TSMP and its associated management strategies. Impacts to conservation significant fauna are recorded in the fauna interaction register. Impacts to fauna habitat have been minimised by adhering to the allowable clearing extents described in the outcomes in condition 5-1(1) to 5-1(4). During the reporting period there has been one (1) Pilbara Olive Python identified within the fauna register. It was observed alive and not impacted by the Project. Clearing of fauna habitat has only occurred within the allowable clearing extents. Annual vegetation and weed monitoring is conducted each year. In November 2024, Trace Ecology undertook this. The preliminary advice

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								has received, with the final report currently under review and expected to be finalised by Trace Ecology which is expected in May 2025. Refer to evidence list providing relevant supporting documentation.
1180: M5.3	Terrestrial fauna management	At least six months prior to Ground Disturbing Activities within the development envelope delineated in Figure 2, or such lesser time approved in writing by the CEO, the proponent shall, in consultation with the Murujuga Aboriginal Corporation and DAWE, revise and submit to the CEO the Fauna Management Plan (PCF-PD-EN-FaMP, Version PCF 1, 12/01/2021) and the Threatened Species Management Plan (PCF-PD-EN-TSMP, PCF 1, 12/01/2021), one or both of which shall: (1) demonstrate how the environmental outcomes in condition 5-1 and environmental objective in condition 5-2 will be achieved; (2) include details of the outcomes of a detailed short-range endemic fauna survey undertaken within the development envelope and surrounding region at least six months prior to Ground Disturbing Activities; (3) include provisions to avoid where practicable and otherwise minimise impacts to significant terrestrial fauna	Revise and update the current version of the FaMP and the TSMP to address all requirements within condition 5-3 and resubmit the FaMP to CEO and the TSMP to the DAWE. Submission through DWER. Consult with MAC, in person meeting and consultation. Written evidence of meeting and correspondence with MAC. Written correspondence through the DWER with CEO and DAWE on approval status of FaMP and TSMP.	Not Applicable	Pre-construction	At least six months prior to Ground Disturbing Activities, or such lesser time approved in writing by the CEO.	CLD	The Proponent considers the requirements of this condition to be completed. Submission of the revised FaMP and TSMP were submitted to CEO and DCCEEW (previously DAWE) in 2022 outside this reporting period.

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

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		trigger criteria and threshold criteria to demonstrate that conditions 5-1 and 5-2 have been met over the reporting period in the Compliance Assessment Report required by condition 15-6.						
1180: M5.4	Terrestrial fauna management	The proponent must not commence Ground Disturbing Activities until the CEO has confirmed in writing that the Fauna Management Plan and the Threatened Species Management Plan satisfy the requirements of condition 5-3.	Written Correspondence that the FaMP and the TSMP satisfies the requirements of 5-3 from CEO and from DAWE for the TSMP.	2025.1180.M5.4 (Letter from DWER approving FaMP) 2025.1180.M3.5a Letter to DCCEEW stating ground disturbance commenced 11 July 2023.	Pre-construction	Prior to ground disturbing activities unless otherwise agreed by the CEO.	CLD	The Proponent considers this condition to be completed. The Ground Disturbing Activities commenced in July 2023 (2025.1180.M3.5a) outside this reporting period. During the reporting period, there was not a commencement of GDA, only a continuation of them and therefore the requirements of this condition were met during the previous reporting period.
1180: M5.5	Terrestrial fauna management	The proponent shall implement the most recent versions of the Confirmed Fauna Management Plan and Confirmed Threatened Species Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcomes in condition 5-1 and objectives detailed in condition 5-2 have been met.	Written correspondence from the CEO through the DWER that the proposal has demonstrated environmental outcomes in condition 5-1 and objectives detailed in condition 5-2 have been met.	Attachment E.MS1180.IS_TSMP Attachment D.MS1180.IS_FaMP	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 5-1 and 5-2 has been met.	C	During the reporting period the proponent has implemented the most recent version of the Confirmed Fauna Management Plan (PCF-PD-EN-FaMP (12 May 2022, PCF4) and the most recent version of the Confirmed Threatened Species Management Plan (PCF-PD-EN-TSMP 9 February

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								2022, PCF5). There were no non-compliances with the requirements of the FaMP identified. While three (3) non-compliances with management actions and/or threshold criteria of the TSMP which were identified during the reporting period, the Proponent is continuing to implement the most recent versions of the TSMP Management Plan, and has continued to demonstrate the environmental outcomes and objectives within the plan are being met Refer to the Implementation Summaries Attachment E.MS1180.IS_TSMP Attachment D.MS1180.IS_FaMP that verify implementation of management actions within the plans. There has been no confirmation notice in writing from the CEO that the proponent has demonstrated environmental outcomes

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								and objectives have been met during the reporting period.
1180: M5.6	Terrestrial fauna management	In the event that the environmental outcomes in condition 5-1 are exceeded, or monitoring or investigations at any time indicate an exceedance of threshold criteria specified in the Confirmed Fauna Management Plan or Confirmed Threatened Species Management Plan, the proponent shall: (1) report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified; (2) implement the management and/or contingency actions required by condition 5-3(8) within seven days of the exceedances being reported as required by condition 5-6(1) and continue implementation of those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the threshold criteria are being met and implementation of the management and/or contingency actions are no longer required; (3) investigate to determine the cause of the threshold criteria being exceeded; (4) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded; (5)provide a further report to the CEO and the DAWE within 21 days of the exceedance being reported as required	Initial written correspondence to the CEO and the DAWE within the required timeframes. b) Within **Seven days** of an exceedance of threshold criteria being identified; or Written correspondence to CEO and the DAWE that the management and contingency actions to be implemented within seven days of the exceedance being identified. Written correspondence from CEO that it has been demonstrated that trigger criteria and/or threshold criteria are being met and implementation of the management and/or contingency actions are no longer required. Written correspondence in the form of a report to the CEO and DAWE within 21 days of exceedance being identified to include: • Report of contingency/management actions, preventative measures implemented.	Attachment E.MS1180.IS_TSMP Attachment D.MS1180.IS_FaMP 2025.1180.M5.6a Notification of Threshold non-compliance to CEO and DCCEEW. 2025.1180.M5.6b Email submitting the notification letter to CEO/DWER.	Overall	Report the exceedance in writing to the CEO and the DAWE within seven days of the exceedance being identified; (2) implement the management and/or contingency actions required by condition 5-3(8) within seven days of the exceedances being reported as required by condition 5-6(1).	NC	During the reporting period there were no exceedances of environmental outcomes in condition 5-1. During the reporting period there was no exceedance of a threshold criteria specified in the Confirmed FaMP. During the preparation of the Annual Compliance Report (EPBC 2018/8383) in Sept-Oct 2024, there was one threshold exceedance identified relating to Management Action 14 and Threshold Criteria 14 of the confirmed TSMP PCF5. The exceedance was reported to the CEO and DWER via letter (2025.1180.M5.6a) on the 9 October 2024. (1) the exceedance was identified on the 3 October 2024 and

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		by condition 5-6(1) which report shall include: (a) details of management and/or contingency actions implemented; (b) the effectiveness of the management and/or contingency actions implemented against the threshold criteria; (c) the findings of the investigations required by conditions 5-6(3) and 5-6(4); (d)measures to prevent the threshold criteria being exceeded in the future; (e) measures to prevent, control or abate the environmental harm which may have occurred; and (f)justification of the threshold criteria remaining, or being adjusted based on better understanding, demonstrating that outcomes will continue to be met.	• Effectiveness of applied management and contingency actions. • Findings of any investigations carried out. • Further measures to prevent future exceedances. • Measures to prevent, control or abate the environmental harm which may have occurred. • Justifications if trigger and/or threshold values remain the same or being adjusted.					reported on the 9 October 2024 (within 7 days) (2) contingency actions were implemented as far as practicable (2025.1180.M5.6a). (3) Letter (2025.1180.M5.6a) provides information on the investigation. The Proponent considered further investigation and reporting of this matter was not required (as no environmental impact had occurred) and the requirements of Condition 5-6 (4) and 5-6 (5) had been addressed via action already taken. All non-compliances identified during the preparation of this CAR, will be reported in the next CAR.
1180: M5.7	Terrestrial fauna management	Without limiting condition 5-5 (implementation of the plans) and notwithstanding compliance with condition 5-6 (response to exceedance), the proponent must not cause or allow: (1) a failure to implement one or more management and/or contingency actions, if the relevant threshold criteria have been exceeded;	Written correspondence.	2025.1180.M5.6a Notification of Threshold non-compliance to CEO and DCCEEW. 2025.1180.M5.6b Email submitting the notification letter to CEO/DWER.	Overall	Life of the Project.	NC	(1) The proponent has implemented management / contingency as far as practicable for exceedances of the TSMP identified during the reporting period (Threshold 14).

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(2) the exceedance of a threshold criteria (regardless of whether the relevant management and/or contingency actions have been or are being implemented); and/or (3) a failure to comply with the requirements of the Confirmed Fauna Management Plan or the Confirmed Threatened Species Management Plan.		Attachment E.MS1180.IS_TSMP Attachment D.MS1180.IS_FaMP				The proponent has caused or allowed: (2) Threshold criteria exceedances of criteria 14, within the TSMP (PCF5). (3) The Proponent has failed to comply with the requirements of the Confirmed TSMP (i.e. 3 non-compliances).
1180: M5.8	Terrestrial fauna management	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review and revise the Confirmed Fauna Management Plan and/or Confirmed Threatened Species Management Plan and submit it to the CEO and the DAWE; and (2) shall review and revise the Confirmed Fauna Management Plan and/or Confirmed Threatened Species Management Plan and submit it to the CEO and the DAWE as and when directed by the CEO.	Consultation with MAC when revisions to either the FaMP or the TSMP are made. Written correspondence. Revised version of the FaMP and / or the TSMP will be prepared in consultation with MAC and submitted to CEO and DAWE.	2025.1180.M5.8a Letter submitting PCF6 TSMP to DCCEEW. 2025.1180.M5.8b Evidence of MAC consultation on TSMP PCF6 NB: evidence is described within the letter to DWER. 2025.1180.M5.8c Email submitting PCF6 TSMP to CEO.	Overall	As required by the Proponent or as directed, requested by the CEO or DAWE.	C	(1) During the reporting period the Approval Holder submitted a revised TSMP (PCF 6) to the Department (DCCEEW) on the 7 February 2024. The TSMP was revised in consultation with MAC. TSMP (rev 7) was approved by DCCEEW on 25 January 2025. This was sent to DWER on 29 January 2025 (slightly outside of this reporting period). (2) During the reporting period, the CEO has not directed the Proponent to review and revise the Confirmed FaMP or the TSMP.

AUDIT TABLE

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
Hydrogeological Management								
1180: M6.1	Hydrogeological management	The proponent shall implement the proposal to meet the following environmental objective: (1) minimise project attributable impacts on groundwater quality, flow direction and/or depth to maintain the hydrological regimes and quality of groundwater and surface water so that environmental values are protected.	Implementation of the approved Confirmed Hydrogeological Management Plan. Defined triggers and thresholds to measure compliance with this condition 6-1.	Attachment F.MS1180.IS_SWMP	Overall	For the life of the Project	NR	The Confirmed Surface Water Management Plan includes provisions to ensure the Project is implemented to meet this objective. During the reporting period, the Project has not conducted groundwater monitoring downgradient from the Project to assess the Project attributable impacts. Baseline hydrological monitoring was conducted prior to construction. A total of five (5) rounds were conducted across fourteen (14) bores on Site C and F. The first round was conducted by Tetra Tech in 2022 and the following four (4) were conducted by SCJV. This data will be used as baseline data and will be used during assessment of groundwater quality when the new bores are installed at the end of 2025.

AUDIT TABLE

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M6.2	Hydrogeological management	At least six months prior to Ground Disturbing Activities, the proponent shall provide the CEO with the results of supplementary detailed hydrogeological studies undertaken by or on behalf of the proponent to quantify baseline groundwater quality, groundwater flow directions, and the depth to groundwater beneath Sites C and F shown on Figure 2 and such studies shall meet the requirements of the: (1) Department of Water 2009, Operational Policy No. 5.12 - Hydrogeological reporting associated with a groundwater well licence, Department of Water, Perth, November 2009; and (2) EPA Victoria 2006, Hydrogeological Assessment (Groundwater Quality) Guidelines, September 2006.	Engage a Consultant to conduct a detailed Hydrogeological study that aims to quantity baseline groundwater quality, flow directions and depth to groundwater beneath Sites C and F. The proponent to provide the results of the hydrogeological study to the CEO in report format. Compliance with the applicable guidelines (Department of Water 2009, Operational Policy No. 5.12 EPA Victoria 2006, Hydrogeological Assessment (Groundwater Quality) Guidelines) will be demonstrated in the factual and interpretive reports. Compliance Assessment Report. Written correspondence.	2025.1180.M6.2 Submission of the Project Destiny Baseline Hydrogeological Assessment.	Pre-construction	At least six months prior to Ground Disturbing Activities.	CLD	The Proponent considers the requirements of this condition to be completed. Project Destiny Baseline Hydrogeological Assessment Ref: 754-PEREN296568 (Rev 0) was submitted to the CEO on 19 July 2022. Ground Disturbance commenced on the 11 July 2023. Studies were provided 12 months prior to GDA commencing.
1180: M6.3	Hydrogeological management	In the event that the studies referred to in condition 6-2 indicate that dewatering would be required during construction, the proponent shall develop in consultation with the Murujuga Aboriginal Corporation, and submit to the CEO together with the studies referred to in condition 6-2 a Hydrogeological Management Plan:	Consult with MAC, in person meeting and consultation. Written evidence of meeting and correspondence with MAC. If hydrogeological study indicates dewatering is required, then prepare and develop a Hydrogeological Management Plan (HGMP) in	Not Applicable	Overall	In the event studies from condition 6-2 demonstrate dewatering would be required during construction.	NR	Studies carried out in condition 6-2 indicated that dewatering would not be required during construction and therefore a Hydrogeological Management Plan was not prepared by the Proponent.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(1) containing management measures for dewatering to meet the environmental objective in condition 6-1; (2) setting out the design, construction and location of groundwater dewatering infrastructure and groundwater monitoring bores to meet the environmental objective in condition 6-1; (3) that applies the Department of Water and Environmental Regulation's Water Quality Protection Note 30 on Groundwater Monitoring Bores (DoW 2006) and the National Uniform Drillers Licensing Committee's Minimum Construction Requirements for Water Bores in Australia – fourth edition (NUDLC 2020); (4) specifying trigger criteria that will trigger the implementation of management and/or contingency actions to prevent direct or indirect impacts; (5) specifying threshold criteria to demonstrate compliance with condition 6-1; (6) specifying monitoring methodology to determine if trigger criteria and threshold criteria have been met; (7) specifying management and/or contingency actions to be implemented if the trigger criteria required by condition 6-3(4) and/or the threshold criteria required by condition 6-3(5) have not been met; and (8) providing the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that the objective in condition 6-1 has been met over the	consultation with MAC to address all requirements within condition 6-3 and submit the HGMP to CEO. Written correspondence through the DWER with CEO on approval status of HGMP. If the studies coupled with the construction methodology deem that dewatering is not required a letter will be provided to CEO through DWER explaining the Proponents approach and rationale.					

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		reporting period in the Compliance Assessment Report required by condition 15-6.						
1180: M6.4	Hydrogeological management	The proponent must not commence dewatering until the CEO has confirmed in writing that the Hydrogeological Management Plan satisfies the requirements of condition 6-3.	Written Correspondence from the CEO that the HGMP satisfies the requirements of condition 6-3.	Not Applicable	Overall	Prior to dewatering.	NR	A HGMP has not been required to be prepared during the reporting period.
1180: M6.5	Hydrogeological management	The proponent shall implement the most recent version of the Confirmed Hydrogeological Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental objective detailed in condition 6-1 has been met.	Implementation of the most recent version of the Hydrogeological Management Plan. Implementation of the updated Hydrogeological Management Plan upon written confirmation by the CEO.	Not Applicable	Overall	For the life of the Project.	NR	A HGMP has not been implemented during the reporting period.
1180: M6.6	Hydrogeological management	The proponent shall sample and monitor all groundwater bores required by condition 6-3 to be identified in the Confirmed Hydrogeological Management Plan at least every six months and compare the results against the baseline groundwater quality, groundwater flow directions, and depth to groundwater obtained from the hydrogeological studies referred to in condition 6-2.	Implementation of the monitoring requirements specified in the Confirmed Hydrogeological Management Plan every 6 months. Compare monitoring results required by condition 6-6 and 6-7(4) with the baseline data from the supplementary hydrogeological study and include in a bi-annual monitoring report.	Not Applicable	Overall	At least every 6 months from commencement of ground disturbing activities.	NR	As a HGMP under condition 6-3 was not prepared and/or implemented by the Proponent, sampling and monitoring required by condition 6-3 has not been carried out during the reporting period. The Proponent carries out groundwater monitoring in accordance with the Surface Water Management Plan.
1180: M6.7	Hydrogeological management	In the event that monitoring required by condition 6-6 or provided for in the management plan indicates an exceedance of trigger levels:	Where monitoring identifies an exceedance of trigger levels, the exceedance will be reported to the CEO within seven days of being identified.	Not Applicable	Overall	The proponent shall report exceedance findings to the CEO within	NR	Monitoring required by condition 6-6 has not been required to be carried out during the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(1) the proponent shall report such findings to the CEO within seven days of the exceedance being identified; (2) the proponent shall provide evidence which allows determination of the cause of the exceedance; (3) if the exceedance is determined by the CEO to be attributable to the proposal, the proponent shall submit to the CEO actions to be taken to address the exceedance within seven days of the proponent being notified in writing of the determination being made; (4) the proponent shall implement the actions to address the exceedance referred to in condition 6-7(3), shall the monitor the effectiveness of those actions, and shall continue to implement and monitor the actions until such time as the CEO determines that the actions may cease; and (5) the proponent shall submit bi-annually, or at a frequency defined to the satisfaction of the CEO, the results of monitoring required by conditions 6 6 and 6-7(4) and the monitoring provided for in the management plan, to the CEO, until such time as the CEO determines that reporting may cease.	Investigate to determine the cause of exceedance and report the cause to the CEO. Determine and submit relevant actions to be taken to address the exceedance (within seven days of reporting the cause of exceedance to the CEO). Implement exceedance corrective actions and monitor their effectiveness until the CEO determines the actions may cease. Provide a bi-annual report to the CEO of the monitoring results required by condition 6-6 and 6-7(4) with the baseline data from the supplementary hydrogeological study and include in a bi-annual monitoring report.			seven days of the exceedance being identified. The proponent shall submit to the CEO the actions to be taken to address the exceedance within seven days of the receival of the determined cause of exceedance notice.		
1180: M6.8	Hydrogeological management	The proponent shall make the monitoring reports required by condition 6-7(5) publicly available in a manner approved by the CEO.	Provide digital copies of the monitoring reports on the Proponent's website.	Not applicable.	Overall	Within a reasonable timeframe approved by the CEO.	NR	There have been no monitoring reports prepared in accordance with condition 6-7 (5) during the reporting period.
1180: M6.9	Hydrogeological	Without limiting condition 6-5 (implementation of the plan) and notwithstanding compliance with	Implement the Confirmed Hydrogeological Management Plan.	Not applicable.	Overall	Throughout the life of the Project.	NR	A Confirmed Hydrogeological Management Plan has

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
	management	condition 6-7 (response to exceedance), the proponent must not cause or allow: (1) a failure to implement one or more management actions, if the relevant threshold criteria has been exceeded; (2) the exceedance of a threshold criteria (regardless of whether threshold contingency actions have been or are being implemented); and/or (3) failure to comply with the requirements of the Confirmed Hydrogeological Management Plan.	Assess implementation of management actions in the CAR. Monitoring of environmental conditions against the trigger criteria. Compliance Assessment Reporting.					not been prepared or implemented on the Project during the reporting period.
1180: M6.10	Hydrogeological management	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review and revise the Confirmed Hydrogeological Management Plan and submit to the CEO; and (2) shall review and revise the Confirmed Hydrogeological Management Plan and submit to the CEO as and when directed by the CEO.	Consultation with MAC when revisions to the HMP are made. Written correspondence. Revised version of the HMP will be prepared in consultation with MAC and submitted to CEO and DAWE.	Not applicable.	Overall	As required by the Proponent or as directed, requested by the CEO or DAWE.	NR	A Confirmed Hydrogeological Management Plan has not been required to be prepared or implemented on the Project during the reporting period.
Acid Sulfate Soils Management								
1180: M7.1	Acid sulfate soils	The proponent shall undertake intrusive acid sulfate soils investigations in accordance with the requirements of the Department of Water and Environmental Regulation's guideline on the Identification and investigation of acid sulfate soils and acidic landscapes (DER 2015) at least six months prior to Ground Disturbing Activities.	Contractor / consultant to undertake acid sulfate soils investigations in accordance with the DWER guidelines at least six months prior to GDA's.	Not Applicable	Pre-construction	At least six months prior to Ground Disturbing Activities.	CLD	The Proponent considers that the requirements of this condition have been completed. Tetra Tech Coffey - Detailed Site Assessment for Acid Sulfate Soil was carried out in the first quarter of 2022 (report dated 19 April 2022). Ground Disturbing Activities (Clearing) commenced July 11, 2023.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M7.2	Acid sulfate soils	In the event that acid sulfate soils are disturbed during the implementation of the proposal, the proponent shall treat and manage acid sulfate soils in accordance with the requirements of the Department of Water and Environmental Regulation's guideline on the Treatment and management of soil and water in acid sulfate soil landscapes (DER, 2015).	Proponent to develop a surface water management plan with inclusions specifying the treatment and management of acid sulfate soils in accordance with the DWER guidelines pursuant to condition 8-2(2), in case of potential ASS disturbance throughout the life of the proposal. Implementation of the approved Confirmed Surface Water Management Plan.	2025.1180.M7.2 (Acid Sulfate Soils Management Plan (PCF-PD-EN-ASSDMP_PCF2 7 January 2025))	Overall	As required.	C	The proponent has prepared an Acid Sulfate Soils Management Plan (PCF-PD-EN-ASSDMP_PCF1 6 June 2023) in accordance with the *Department of Water and Environmental Regulation's guideline on the Treatment and management of soil and water in acid sulfate soil landscapes* (DER, 2015) which describes to the contractor how to treat and manage ASS in accordance with the guidelines. DWER provided feedback on the Acid Sulfate Soils Management Plan (PCF-PD-EN-ASSDMP_PCF1 6 June 2023), the Proponent updated the Plan. The most recent version of which is Acid Sulfate Soils Management Plan (PCF-PD-EN-ASSDMP_PCF2 7 January 2025) and has been provided as evidence.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
Surface Water Management								
1180: M8.1	Surface water	The proponent shall implement the proposal to achieve the following environmental objective: (1) maintain the hydrological regimes and quality of surface water so that environmental values are protected.	Implementation of the approved Confirmed Surface Water Management Plan. Defined triggers and thresholds to measure compliance with this condition 8-1.	Attachment F.MS1180.IS_SWMP	Overall	Throughout the life of the proposal.	C	The proposal has not impacted the environmental values associated with maintaining the hydrological regimes. Ten surface water monitoring events were completed during the 2024–25 reporting period, occurring in direct response to rainfall events when surface water was present. Sampling was not conducted during dry months (January–February, May, July, September–December), consistent with the SWMP provisions for safety, accessibility, and presence of surface water. Field parameters were collected and reviewed at each sampling event in accordance with monitoring protocols. Surface water monitoring locations SW1–SW6 were not sampled during the reporting period due to a lack of standing or ponded water. These

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								sites represent upstream ephemeral drainage lines and were dry during all scheduled checks. Aerial imagery and site inspections confirm no surface water was present at these locations throughout the reporting period. During the January 2025 cyclone event, the sediment basins at Site F overtopped. The Site C basin did not overflow, though some discharge was observed via environmental control structures. Sampling was conducted downstream at WQ2, WQ3, SWDC2, and SWDC3. Field parameters collected from these locations, including pH, electrical conductivity, and turbidity, were reviewed and confirmed to be within acceptable ranges downstream. While pH levels exceeded 8.5 within the Site F basin, downstream values complied with the SWMP criteria, indicating no environmental impact

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								beyond the containment areas. The above information supports the assessment that the hydrological regimes and quality of surface water have been maintained.
1180: M8.2	Surface water	At least six months prior to Ground Disturbing Activities within the development envelope delineated in Figure 2, or such lesser time approved in writing by the CEO, the proponent shall in consultation with the Murujuga Aboriginal Corporation, revise and submit to the CEO the Surface Water Management Plan, Perdaman Urea Project Burrup Peninsula, Western Australia (Version PCF 1, 24 January 2021) which shall: (1) demonstrate how the environmental objective in condition 8-1 will be achieved; (2) specify the treatment and management of potential acid sulfate soils in accordance with the requirements of condition 7-1 and condition 7-2; (3) specify trigger criteria that will trigger the implementation of management and/or contingency actions to prevent direct or indirect impacts; (4) specify threshold criteria to demonstrate compliance with condition 8-1;	Revise and update the current version of the SWMP in consultation with MAC to address all requirements within condition 8-2 and resubmit the SWMP to CEO. Submission through DWER. Consult with MAC, in person meeting and consultation. Written evidence of meeting and correspondence with MAC. Written correspondence through the DWER with CEO on approval status of SWMP.	2025.1180.M8.2 (Letter from CEO approving the SWMP).	Pre-constructio n	At least six months prior to Ground Disturbing Activities within the development envelope delineated in Figure 2, or such lesser time approved in writing by the CEO.	CLD	The proponent considers the requirements of this condition have been completed. Submission to CEO of revised SWMP occurred outside this reporting period on the 9 May 2022. The SWMP includes all information listed in M 8.2 (1) – (7) as indicated by correspondence from CEO on the 13 July 2022 stating such.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(5) specify monitoring methodology to determine if trigger criteria and threshold criteria have been met; (6) specify management and/or contingency actions to be implemented if the trigger criteria required by condition 8-2(3) and/or the threshold criteria required by condition 8-2(4) have not been met; and (7) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that the objective in condition 8-1 has been met over the reporting period in the Compliance Assessment Report required by condition 15-6.						
1180: M8.3	Surface water	The proponent must not commence Ground Disturbing Activities until the CEO has confirmed in writing that the Surface Water Management Plan submitted under condition 8-2 satisfies the requirements of condition 8-2.	Written Correspondence that the SWMP satisfies the requirements of 8-2 from CEO.	2025.1180.M8.2a (Letter from CEO approving the SWMP).	Pre-construction	Prior to ground disturbing activities.	CLD	This condition has been completed. Letter from CEO (13 July 2022) confirming that Surface Water Management Plan satisfies condition requirements of 8-2 Ground Disturbing Activities (Clearing) commenced 11 July 2023.
1180: M8.4	Surface water	The proponent shall implement the most recent version of the Confirmed Surface Water Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective detailed in condition 8-1 has been met.	Written correspondence from the CEO through the DWER that the proposal has demonstrated environmental objectives detailed in condition 8-1 have been met.	Attachment F.MS1180.IS_SWMP	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the	C	The most recent version of the confirmed Surface Water Management Plan (PCF3) has been implemented during the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
						objective in condition 8-1 has been met.		The Attachment F.MS1180.IS_SWMP provides details of implementation of management actions and commitments in the Plan. During the reporting period the CEO has not confirmed by notice in writing that the proponent has demonstrated that the objective detailed in condition 8-1 has been met.
1180: M8.5	Surface water	In the event that the environmental objective in condition 8-1 is not achieved, or monitoring or investigations at any time indicate an exceedance of threshold criteria specified in the Confirmed Surface Water Management Plan the proponent shall: (1) report the exceedance in writing to the CEO within seven days of the exceedance being identified; (2) implement the management and/or contingency actions specified in the Confirmed Surface Water Management Plan as required by condition 8-2(6) within seven days of the exceedances being reported as required by condition 8-5(1) or such lesser time specified in the Confirmed Surface Water Management Plan and continue implementation of those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the threshold criteria are being met and	Initial written correspondence to the CEO within the required timeframes. c) Within **Seven days** of an exceedance of threshold criteria being identified; or Written correspondence to CEO and DWER of the management and contingency actions to be implemented within seven days of the exceedance being identified. Written correspondence from CEO that it has been demonstrated that trigger criteria and/or threshold criteria are being met and implementation of the management and/or	Attachment F.MS1180.IS_SWMP	Overall	Report the exceedance in writing to the CEO within seven days of the exceedance being identified; Implement the management and/or contingency actions specified in the Confirmed Surface Water Management Plan as required by condition 8-2(6) within	NR	During the reporting period, there were no exceedances of threshold criteria identified or indications that the environmental objective was not being met. Exceedances identified during the preparation of this CAR will be reported in accordance with this condition.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		implementation of the management and/or contingency actions are no longer required; (3) investigate to determine the cause of the threshold criteria being exceeded; (4) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded; (5) provide a further report to the CEO within 21 days of the exceedance being reported as required by condition 8-5(1) and such further report shall include: (a) details of management and/or contingency actions implemented; (b) the effectiveness of the management and/or contingency actions implemented against the threshold criteria; (c) the findings of the investigations required by conditions 8-5(3) and 8-5(4); (d) measures to prevent the threshold criteria being exceeded in the future; (e) measures to prevent, control or abate the environmental harm which may have occurred; and (f) justification of the threshold criteria remaining, or being adjusted based on better understanding, demonstrating that outcomes will continue to be met.	contingency actions are no longer required. Written correspondence in the form of a report to the CEO and DWER within 21 days of exceedance being identified to include: • Report of contingency/management actions, preventative measures implemented • Effectiveness of applied management and contingency actions. • Findings of any investigations carried out. • Further measures to prevent future exceedances • Measures to prevent, control or abate the environmental harm which may have occurred • Justifications if trigger and/or threshold values remain the same or being adjusted.			seven days of the exceedances being reported as required by condition 8-5(1) or such lesser time specified in the Confirmed Surface Water Management Plan.		

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1180: M8.6	Surface water	Without limiting condition 8-4 (implementation of the plan) and notwithstanding compliance with condition 8-5 (response to exceedance), the proponent must not cause or allow: (1) a failure to implement one or more management actions, if the relevant threshold criteria has been met; (2) the exceedance of a threshold criteria (regardless of whether threshold contingency actions have been or are being implemented); and/or (3) failure to comply with the requirements of the Confirmed Surface Water Management Plan.	Written correspondence.	Attachment F.MS1180.IS_SWMP	Overall	Throughout the life of the Project.	NC	There was two (2) instances of a non-compliance with the requirements (management actions) of the SWMP identified (non-compliance with 8-6(3), two instances of monitoring requirements not being implemented according to the Plan and three (3) instances of potential non-compliances relating to triggers and thresholds (TC2, TC3 and TC4). **Management Action 3:** The surface water monitoring program was implemented throughout the reporting period, with ten monitoring events completed following rainfall, consistent with SWMP provisions for ephemeral systems. Field parameters (pH, turbidity, electrical conductivity, and visual observations) were recorded and reviewed, with no indicators of contamination or exceedance of surface water quality thresholds observed.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								However, laboratory analysis was not conducted during the January 2025 discharge event, which is a requirement under the Confirmed SWMP. In addition, routine monthly laboratory analysis across surface water monitoring sites was not performed, due to a misinterpretation of the SWMP monitoring tables (Tables 2-3 to 2-5). This represents a minor non-compliance with the laboratory sampling components of MA3. Despite this, all other elements of MA3 were fulfilled: • Visual inspections and field measurements were completed; • Discharge structures and basins were managed to prevent uncontrolled releases of poor-quality water;

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								• No project-attributable surface water impacts were observed. **Management Action 4:** Groundwater monitoring was not implemented during the 2024–25 reporting period in accordance with the Baseline Hydrogeological Assessment and Surface Water Management Plan (SWMP), due to the decommissioning of the bore network in October–November 2023 and the absence of replacement bores. Based on the Hydrogeological Assessment, the nature of construction works, and available monitoring data, there is no indication of adverse groundwater impacts. **Trigger and threshold criterion 2:** There was no exceedance of the threshold identified, however monitoring which measures a potential exceedances

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								was not performed in accordance with the SWMP. Laboratory analysis of samples was not conducted during the January discharge event, which is a deviation from the SWMP monitoring requirements for stormwater discharges. This deviation is considered a minor non-compliance, as field parameters showed no indication of environmental harm, and downstream water quality remained within the SWMP thresholds. **Trigger and threshold criterion 3 and Trigger and threshold criterion 4:** The groundwater monitoring bores established during early project phases were decommissioned in October and November 2023 to enable bulk earthworks and infrastructure construction. Groundwater level trends

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								could not be assessed during the 2024–25 reporting period due to the absence of an operational site-wide monitoring network. No replacement bores were installed during the 2024–25 reporting period, and therefore formal groundwater level and quality monitoring was not undertaken as outlined in the Baseline Hydrogeological Assessment and SWMP. However, the baseline hydrological report prepared for the project specifies that groundwater quality monitoring should occur every six months throughout construction, and the SWMP requires quarterly sampling during this phase. These obligations were not fulfilled during the reporting period, due to a misinterpretation that groundwater monitoring applied only during operational phases or in the presence of dewatering impacts.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								Limited groundwater sampling was undertaken at a single retained bore, BH22, one of the original monitoring bores for the project. BH22 is located upgradient of active construction areas and is considered hydrologically separated from any potential project-related impacts, making it representative of background conditions. Water quality data from BH22 was collected at a frequency greater than that required by the Confirmed Plans. The proponent is finalising plans for the installation of a new groundwater monitoring network, to be completed by July 2025. Monitoring of groundwater levels and quality will resume in accordance with the Confirmed Plans. A governance review is also underway to strengthen environmental monitoring planning during construction phases and prevent recurrence of similar gaps. There is no evidence of project-related impacts to

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								groundwater levels or hydrological.
1180: M8.7	Surface water	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review and revise the Confirmed Surface Water Management Plan and submit it to the CEO; and (2) shall review and revise the Confirmed Surface Water Management Plan and submit it to the CEO as and when directed by the CEO.	Consultation with MAC when revisions to the SWMP are made. Written correspondence. Revised version of the SWMP will be prepared in consultation with MAC and submitted to CEO DWER.	Not Applicable	Overall	As required by the Proponent or as directed, requested by the CEO.	NR	There has been no review and revision of the SWMP (PCF3) in consultation with MAC, during the reporting period.
Cultural Heritage Management								
1180: M9.1	Cultural heritage	The proponent must implement the proposal to meet the following objectives: (1) avoid, where possible, and otherwise minimise direct and indirect impacts to social, cultural, heritage, and archaeological values within and surrounding the development envelope; (2) allow ongoing Traditional Owner and Custodian access to enable traditional activities and connection to culturally significant areas within and surrounding the development envelope as shown in Figure 2; (3) allow Traditional Owner and Custodian access to the development envelope following decommissioning of the proposal as shown in Figure 2; and (4) avoid, where possible, and otherwise minimise direct and indirect impacts to visual and amenity impacts to social and cultural places and activities.	Implement the Cultural Heritage Management Plan (CHMP). Letters of consultation to the Traditional Owner and Custodians allowing access to enable traditional activities and connection to culturally significant areas within and surrounding the development envelope during implementation of proposal and following decommissioning.	2025.1180.M9.1 (EPA Non-achievement Further Report). Attachment G.MS1180.IS_CHMP	Overall	Throughout the life of the project.	C	(1) During the reporting period, there has been no incidents where direct and/or indirect impacts have been caused to social, cultural, heritage, and archaeological values within and surrounding the development envelope. There was a non-achievement of two management targets during the reporting period (target 15 & 16), however there were no direct or indirect impacts caused (refer to 2025.1180.M9.1). (2) During the reporting period, the proponent have maintained open

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								communication and consultation with traditional owners and MAC through regular meetings. Traditional Owner and Custodian access has been supported on the Project via these means. (3) Objective 3 has not been applicable during the reporting period. (4) There have been no incidents where direct and indirect impacts to visual and amenity impacts to social and cultural places and activities have occurred during the reporting period. Refer to Section 4.3, Table 6 of this CAR and the Attachment G for status of compliance with cultural heritage objectives.
1180: M9.2	Cultural heritage	At least six months prior to Ground Disturbing Activities, the proponent shall, in consultation with the Murujuga Aboriginal Corporation and the DPLH, revise and submit to the CEO and the Registrar of Aboriginal Sites a further version of the Aboriginal Heritage Management Plan, Status: Confidential, Perdaman Urea Project Burrup	Consultation with MAC, face to face meetings and written correspondence. Consultation with DPLH written correspondence. Revise and submit to the CEO and Registrar of Aboriginal Sites a revised version of the	2025.1180.M9.2 (Cultural Heritage Management Plan Approval letter by the CEO on 22 June 2022)	Pre-construction	At least six months prior to Ground Disturbing Activities.	CLD	The Proponent considers the requirements of this condition to be completed. The revised CHMP was submitted to the CEO on 11 May 2022 and Registrar of Aboriginal

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		Peninsula, Western Australia (Version PCF 2, 26 March 2021) to meet the objectives specified in condition 9-1 and this plan shall: (1) specify the objectives to be achieved, as specified in condition 9-1; (2) include a framework for consultation with Traditional Owners and Custodians via the Murujuga Aboriginal Corporation and other relevant stakeholders during the life of the proposal; (3) specify construction environmental management activities relevant to cultural heritage, not limited to and including noise (not limited to and including at Yatha), construction emissions and air quality, traffic management and visual amenity and provide for relevant traditional owners to be invited to observe any Ground Disturbing Activities and during construction, and take reasonable steps to facilitate the observation of those activities by those persons; (4) specify operational environmental management activities relevant to cultural heritage, not limited to and including noise (not limited to and including at Yatha), traffic management and visual amenity and the provision for relevant traditional owners to observe the activities (as reasonably required); (5) specify risk-based management actions that will be implemented to demonstrate compliance with the objectives specified in condition 9-1;	Aboriginal Heritage Management Plan (2021). Revise the Plan and rename it Cultural Heritage Plan in line with references made in conditions 9 - 4.					Sites on 11 May 2022 outside the reporting period for this CAR. The CHMP includes all information as listed in M 9.2 (1) – (9) as communicated to the Proponent within the approval letter from the CEO on 22 June 2022.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(6) specify measurable management target(s) to determine the effectiveness of the risk-based management actions; (7) specify monitoring to measure the effectiveness of management actions against management targets; (8) specify a process for revision of management actions and changes to proposal activities, in the event that the management targets are not achieved, and such process must include an investigation to determine the cause of the management target(s) not being met; (9) provide the format and timing to demonstrate that condition 9-1 has been met for the reporting period in the Compliance Assessment Report required by condition 15-6 including, but not limited to: (a)verification of the implementation of management actions; and (b)reporting on the effectiveness of management actions against management target(s).						
1180: M9.3	Cultural heritage	The proponent must not commence Ground Disturbing Activities until the CEO has confirmed in writing that the plan submitted under condition 9-2 satisfies the requirements of condition 9-2.	Written Correspondence that the CHMP satisfies the requirements of 9-3 from the CEO.	2025.1180.M9.2 Cultural Heritage Management Plan Approval letter by the CEO on 22 June 2022	Pre-construction	Prior to ground disturbing activities.	CLD	The Proponent considers the requirements of this condition to be completed. The Cultural Heritage Management Plan was approved by the CEO on 22 June 2022 by approval letter which states the plan satisfies the requirements of condition 9-2.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								Ground Disturbing Activities (Clearing) commenced July 11, 2023.
1180: M9.4	Cultural heritage	The proponent must implement the most recent version of the Confirmed Cultural Heritage Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated the objectives specified in condition 9-1 have been met.	Written correspondence from the CEO that the proposal has demonstrated that environmental objectives detailed in condition 9-1 have been met.	Attachment G.MS1180.IS.CHMP 2025.1180.M9.4a Non-Achievement of Notification Letter to DWER. 2025.1180.M9.4b Email to CEO submitting a revised CHMP (version PCF8). 2025.1180.M9.4c Email submitting the Non-achievement notification to DWER.	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 9-1 has been met.	C	During the reporting period the CHMP PCF 8 was implemented, which is the most recent version. Two management targets were not implemented as stated within the CHMP. The CEO has not confirmed by notice in writing that the proponent has demonstrated the objectives specified in condition 9-1 have been met.
1180: M9.5	Cultural heritage	In the event that monitoring, tests, surveys or investigations indicate non-achievement of management target(s) specified in the Confirmed Cultural Heritage Management Plan, the proponent must: (1) report the non-achievement in writing to the CEO, the Murujuga Aboriginal Corporation, the DPLH, and the Registrar of Aboriginal Sites within 21 days of the non-achievement being identified;	Written correspondence to the CEO, the MAC, the DPLH and the Registrar of Aboriginal Sites of the non-achievement identified. Written report to the CEO, the MAC, the DPLH and the Registrar of Aboriginal Sites with provisions required by 9-5 included.	2025.1180.M9.5a Non-Achievement of Notification Letter to CEO, Murujuga Aboriginal Corporation, the DPLH. 2025.1180.M9.5b EPA Non-achievement Further Report.	Overall	Report submitted within 21 days of the non-achievement being identified. Further report within 90 days of the non-achievement being reported.	C	During the reporting period, two Non-achievements with Management Targets were identified. These were identified during the preparation of the Annual Compliance Reporting completed under the EPBC Approval. (1) The Non-Achievement of Cultural Heritage

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(2) investigate to determine the cause of the management target(s) not being achieved; (3) provide a further report to the CEO, the Murujuga Aboriginal Corporation, the DPLH, and the Registrar of Aboriginal Sites within 90 days of the non-achievement being reported as required by condition 9-5(1) which must include: (a) a description of the cause of management target(s) being exceeded if known, or analysis of likely causes if not known; (b) the findings of the investigation required by condition 9-5(2); (c) details of revised and/or additional management actions to be implemented to prevent non-achievement of the management target(s); and (d) relevant changes to proposal activities.		2025.1180.M9.5c Email submitting the letter and further report.				Management Targets was reported in writing to: • CEO/DWER • MAC • Registrar of Aboriginal Sites • DPLH • And DCCEEW On 22 October 2024. The non-achievement was identified on the 3 October 2024. Therefore reporting occurred within 21days of the identification. (2) The Proponent investigated the cause of the non-achievements. These causes were included within the notification letter (2025.1180.M9.5a) (3) A further report was sent to CEO/DWER, MAC, Registrar of Aboriginal Sites, DPLH and DCCEEW on 20 January 2025, which is within 90 days of the non-achievement being reported. Parts 3a, 3b, 3c and 3d were included within the further report as evidence by 2025.1180.M9.1a.

AUDIT TABLE

PROPOSAL: Perdaman Urea Project

STATEMENT: 1180

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M9.6	Cultural heritage	In the event that monitoring, tests, surveys or investigations indicate that one or more management action(s) specified in the Confirmed Cultural Heritage Management Plan have not been implemented, the proponent must: (1) report the failure to implement the management action(s) in writing to the CEO, the Murujuga Aboriginal Corporation, the DPLH, and the Registrar of Aboriginal Sites within seven days of identification; (2) investigate to determine the cause of the management action(s) not being implemented; (3) investigate to determine potential environmental harm or alteration of the environment that occurred due to the failure to implement management action(s); (4) provide a further report to the CEO, the Murujuga Aboriginal Corporation, the DPLH, and the Registrar of Aboriginal Sites within 28 days of the non-compliance being identified, which must include: (a) cause for failure to implement management action(s); (b) the findings of the investigation required by condition 9-6(2); (c) relevant changes to proposal activities; and (d) measures to prevent, control or abate the environmental harm which may have occurred.	Monitor the environmental conditions against the objective in 9-1 to determine non-compliance. Written correspondence (report) to the CEO, MAC, DPLH and the Registrar within seven days of identification. Further report to the CEO, MAC, DPLH and the Registrar within 28 days of the non-compliance being identified with provisions required by 9-6 included.	Attachment G.MS1180.IS.CHMP	Overall	Report the failure to implement the management action(s) in writing to the CEO, the Murujuga Aboriginal Corporation, the DPLH, and the Registrar of Aboriginal Sites within seven days of identification and provide a further report to the CEO, the Murujuga Aboriginal Corporation, the DPLH, and the Registrar of Aboriginal Sites within 28 days of the non-compliance being identified.	NR	During the reporting period, there have been no indications that management actions have not been implemented within the Confirmed Cultural Heritage Management Plan that would trigger this condition. Further information is provided in section 4.3 and Table 6 status of compliance with the CHMP and Attachment G.MS1180.IS.CHMP
1180: M9.7	Cultural heritage	Without limiting condition 9-4 (implementation of the plan) and notwithstanding compliance with	Written correspondence.	Attachment G.MS1180.IS.CHMP	Overall	Throughout the life of the Project.	NC	All relevant management actions were implemented during the

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		condition 9-5 (response to exceedance), the proponent must not cause or allow: (1) a failure to implement one or more management actions specified in the Confirmed Cultural Heritage Management Plan, and/or (2) failure to comply with the requirements of the Confirmed Cultural Heritage Management Plan.						reporting period, as demonstrated within Attachment G.MS1180.IS.CHMP. During the reporting period the Project failed to comply with two management targets which are requirements of the Confirmed Cultural Heritage Management Plan. Non-compliances of the Management Targets 15 and 16 were identified during the reporting period. No environmental or heritage harm was caused as a result.
1180: M9.8	Cultural heritage	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1) may review and revise the Confirmed Cultural Heritage Management Plan and submit it to the CEO; and (2) shall review and revise the Confirmed Cultural Heritage Management Plan and submit it to the CEO as and when directed by the CEO.	Consultation with MAC when revisions to the CHMP are made. Written correspondence. Revised version of the CHMP will be prepared in consultation with MAC and submitted to the CEO.	2025.1180.M9.8a Letter to CEO submitting a revised CHMP (version PCF8). 2025.1180.M9.8b Notification of CHMP Changes to DWER. 2025.1180.M9.8c (Letter and email to CEO submitting a revised CHMP (version PCF8)	Overall	As required by the Proponent or as directed / requested by the CEO.	C	(1) During the reporting period, the Proponent has reviewed and revised the Confirmed Cultural Heritage Management Plan (PCF6) in consultation with MAC and submitted version PCF8 to the CEO on the 25 March 2024 and to a different email address to the DWER on 15 April 2024. (2) The CEO has not directed the Proponent to

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
				dated 25 March 2024). 2025.1180.M9.8d Evidence of MAC consultation for revision of CHMP (version PCF8).				review and revise the Confirmed CHMP during the reporting period.
Light Management								
1180: M10. 1	Light managem ent	The proponent shall implement the proposal to meet the following environmental objective: (1) avoid, where possible, and otherwise use best practice technology and risk-based management actions to minimise nightglow and light overspill from the proposal so that the environmental values of amenity at sensitive locations, including, but not limited to Hearson Cove and Deep Gorge, are protected.	Implementation of the approved Confirmed Light Management Plan. Defined triggers and thresholds to measure compliance with this condition 10-1.	Attachment H.MS1180.IS_LMP	Overall	Throughout the life of the proposal.	C	During the reporting period there have been no incidents that indicate that this objective is not being met. The Confirmed LMP includes best practice technology and risk-based management actions to minimise nightglow and light overspill from the proposal. There were no non-compliances of management actions during the period.
1180: M10. 2	Light managem ent	At least six months prior to Ground Disturbing Activities, the proponent shall provide the CEO with a Light Management Plan which has been prepared in consultation with the Murujuga Aboriginal Corporation and that demonstrates that the proposed lighting design adopts best practice lighting control measures to meet the objective in condition 10-1 and which shall:	Develop a Light Management Plan including the required provisions of 10-2 to meet the objective of 10-1. Determination of best practice lighting design and include in the LMP. Inclusion of the required provisions of 10-2 in the LMP.	2025.1180.M10.2 CEO confirming LMP meets requirements of this condition. Letter also notes submission of the LMP was made on the 9 May 2022.	Pre-constructio n	At least six months prior to Ground Disturbing Activities.	CLD	The Proponent considers the requirements of this condition to be completed. The Light Management Plan (PCF2) was prepared in consultation with MAC and was submitted to CEO via email on 9 May 2022. Ground Disturbing

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(1) specify best practice technology and risk-based management actions that will be implemented to demonstrate compliance with the objective specified in condition 10-1; (2) specify measurable management target(s) to determine the effectiveness of the best practice technology and risk-based management actions; (3) specify monitoring to measure the effectiveness of best practice technology and management actions against management targets; (4) specify a process for revision of best practice technology and management actions and changes to proposal activities, in the event that the management targets are not achieved, and this process must include an investigation to determine the cause of the management target(s) not being met; (5) provide the format and timing to demonstrate that condition 10-1 has been met for the reporting period in the Compliance Assessment Report required by condition 15-6 including, but not limited to: (a)verification of the implementation of best practice technology and management actions; and (b)reporting on the effectiveness of best practice technology and management actions against management target(s).						Activities commenced 11 July 2023 (both outside this reporting period). The LMP (PCF2) includes all the information as per M 10.2 (1) – (5) and it satisfies the requirements of the condition, this was confirmed in writing by the CEO (2025.1180.M10.2). LMP (PCF2) was provided to CEO 14 months prior to GDA commencing.
1180: M10.3	Light management	The proponent must not commence Ground Disturbing Activities until the CEO has confirmed in writing that the Light Management Plan satisfies the requirements of condition 10-2.	Written Correspondence that the LMP satisfies the requirements of 10-2 from the CEO.	2025.1180.M10.2 CEO confirming LMP meets requirements of condition 10-2.	Pre-construction	Prior to ground disturbing activities.	CLD	The Proponent considers the requirements of this condition to be completed.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								The Light Management Plan approved by the CEO in writing on 8 July 2022. LMP was confirmed in writing by the CEO to have satisfied the requirements of condition requirements of 10-2, twelve months prior to GDA. Ground Disturbing Activities commenced 11 July 2023 (outside this reporting period).
1180: M10.4	Light management	The proponent shall implement the most recent version of the Confirmed Light Management Plan.	The latest LMP version to remain implemented during revisions before amendments are made to the newest version to be implemented upon approval by the CEO.	Attachment H.MS1180.IS_LMP	Overall	Throughout life of the project.	C	During the reporting period the proponent has implemented the Confirmed Light Management Plan (PCF2), including all applicable management actions (refer to Attachment H.MS1180.IS_LMP).
1180: M10.5	Light management	Without limiting condition 10-4 (implementation of the plan), the proponent must not cause or allow: (1) a failure to implement any best practice technology or management actions specified in the Confirmed Light Management Plan; and/or (2) non-compliance with the requirements of the Confirmed Light Management Plan.	Implement the Confirmed Light Management Plan. Assess implementation of management actions in the CAR. Monitoring of environmental conditions against the trigger criteria.	Attachment H.MS1180.IS_LMP	Overall	Throughout the life of the Project.	C	(1) During the reporting period, the proponent has not failed to implement applicable management actions specified in the Confirmed LMP. (2) During the reporting period, there have been no non-compliances with the Confirmed LMP.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
			Compliance Assessment Reporting.					
1180: M10. 6	Light management	The proponent, in consultation with the Murujuga Aboriginal Corporation: (1)may review and revise the Confirmed Light Management Plan and submit it to the CEO; or (2)shall review and revise the Confirmed Light Management Plan and submit it to the CEO as and when directed by the CEO.	Consultation with MAC when revisions to the CHMP are made. Written correspondence. Revised version of the CHMP will be prepared in consultation with MAC and submitted to the CEO.	Not Applicable.	Overall	As required by the Proponent or as directed / requested by the CEO.	NR	(1) During the reporting period the Confirmed LMP (PCF2) was reviewed and revised to include the latest Pendoley Light Modelling and impact assessment. However, has not been submitted and/or implemented during period. PCF2 is the version implemented during the reporting period. The revised LMP (PCF4) was updated in consultation with MAC. (2) No reviews and revisions have been made at the direction of the CEO.
1180: M10. 7	Light management	The proponent shall continue to implement the latest revision of the Confirmed Light Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental objective detailed in condition 10-1 has been met.	Written correspondence from the CEO that the proposal has demonstrated that environmental objectives detailed in condition 10-1 have been met.	Attachment H (LMP Implementation Summary)	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 10-1 has been met.	C	During the reporting period, the Proponent has continued to implement the most recently approved version of the Light Management Plan (PCF2) during the period The CEO has not confirmed by notice in writing that the proponent has demonstrated that

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								the environmental objective detailed in condition 10-1 has been met, as such the LMP is continued to be implemented.
Offsets Management								
1180: M11. 1	Offsets	The proponent shall contribute funds to the Pilbara Environmental Offsets Fund, (for the implementation of offset projects preferably located in Murujuga) calculated pursuant to condition 11-2, to counterbalance the significant residual impacts to: (1) 'Good' to 'Excellent' condition native vegetation, including foraging and dispersal habitat for the Pilbara olive python, northern quoll, ghost bat and EPBC Act listed migratory/marine bird habitat; and (2) Priority 1 PEC – Burrup Peninsula rock pile communities, which is also critical habitat for the Pilbara olive python and northern quoll.	Monitor the area (hectares) of cleared 'Good' to 'Excellent' condition vegetation. Proponent to contribute payment to the Pilbara Environmental Offsets Funds of the appropriate contribution rate for the applicable financial year (contribution rates will be subject to change for the 2022-2023 financial year in accordance with 11-4) that clearing was undertaken per hectare of 'Good to Excellent' condition native vegetation and conservation significant habitat and Priority 1 PEC – Burrup Peninsula rock pile communities.	Not Applicable	Overall	Post clearing works.	NR	Initial payment was made within the 2022-2023 reporting period. There has been no requirement to implement this condition during the reporting period. Payment is due in accordance with condition 11.2.
1180: M11. 2	Offsets	The proponent's provisional contribution to the Pilbara Environmental Offsets Fund shall be paid after the conclusion of the biennial reporting period specified in conditions 11-5(4) and 11-5(5), with the provisional amount to be contributed calculated based on the clearing undertaken during that biennial reporting period in accordance with the highest	The proponent must prepare and submit an Impact Reconciliation Procedure to the CEO as per condition 11-5 after the biennial reporting period, which will assist in informing the contribution total to be paid to the Pilbara Environmental Offsets Fund.	Not Applicable	Overall	Paid after the conclusion of the biennial reporting period specified in conditions 11-5(4) and 11-5(5).	NR	Biennial Reporting period commenced from date of clearing commencement, on the 11 July 2023. First Biennial Reporting Period is therefore 11 July 2023 – 30th June 2025.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		applicable rate specified in condition 11-3 for the relevant type of vegetation.						Therefore, the payment is not due until after the 30 of June 2025.
1180: M11. 3	Offsets	Calculated on the 2019–2020 financial year, the contribution rates are: (1) $826 AUD (excluding GST) per hectare of 'Good to Excellent' condition native vegetation, including foraging and dispersal habitat for the Pilbara olive python, northern quoll, ghost bat and EPBC Act listed Migratory/marine bird habitat, cleared for the proposal within the Roebourne IBRA subregion within that financial year; and (2)$1,653 AUD (excluding GST) per hectare of Priority 1 PEC – Burrup Peninsula rock pile communities, which is also critical habitat for the Pilbara olive python and northern quoll (rocky outcrop), cleared for the proposal within the Roebourne IBRA subregion within that financial year.	Payment made to the Pilbara Environmental Offsets Fund in accordance with the applicable contribution rates subject to change each financial year.	Not applicable	Overall	Calculated specific to the financial year that clearing works are undertaken.	NR	Initial payment was made within the 2022-2023 reporting period. During this reporting period the Proponent has not been required to make any payments in accordance with this condition.
1180: M11. 4	Offsets	The rates in condition 11-3 change annually each subsequent financial year in accordance with the percentage change in the CPI applicable to that financial year.	Determine the contribution rates in accordance with the percentage change in the CPI applicable to the financial year that clearing works commence.	Not Applicable	Overall	Specific to the financial year that clearing works are undertaken.	NR	During this reporting period the Proponent has not been required to make any payments in accordance with this condition.
1180: M11. 5	Offsets	The proponent must prepare and submit a Perdaman Urea Project Impact Reconciliation Procedure to the CEO prior to the Ground Disturbing Activities which must: (1) spatially define the environmental value(s) identified in condition 11-1; (2) spatially define the areas in respect of which offsets required by condition 11-1 are to be calculated;	Prepare and submit an Impacts Reconciliation Procedure to the CEO with provisional requirements of 11-5 included and set out in accordance with the Instructions on how to prepare Environmental Protection Act 1986 Part IV Impact Reconciliation	2025.1180.M11.6 Letter from DWER to Approval holder approving the IRP (Rev 1) (25 May 2022). Letter notes that the IRP was submitted to DWER on the 30 March 2022.	Pre-constructio n	Prior to the Ground Disturbing Activities.	CLD	The Proponent considers the requirements of this condition to be completed. The Impact Reconciliation Procedure (IRP) was submitted on the 30 March 2022 to the CEO.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(3) include a methodology to calculate the amount of clearing undertaken during each year of the biennial reporting period for each of the environmental values identified in conditions 11-3(1) and (2); (4) state that the clearing calculation for the first biennial reporting period will commence from the first date of Ground Disturbing Activities in accordance with condition 11-2 and end on the second 30 June following the commencement of Ground Disturbing Activities; (5) state that clearing calculations for each subsequent biennial reporting period will commence on 1 July of the required reporting period, unless otherwise agreed by the CEO; (6) indicate the timing and content of the Impact Reconciliation Reports; and (7) be prepared in accordance with Instructions on how to prepare Environmental Protection Act 1986 Part IV Impact Reconciliation Procedures and Impact Reconciliation Reports (or any subsequent revisions).	Procedures and Impact Reconciliation Reports.					CEO confirmed on 25 May 2022 that the IRP meets the requirements of Condition 11, prior to GDA commencing on the 11 July 2023.
1180: M11. 6	Offsets	The proponent must not commence Ground Disturbing Activities until the CEO has confirmed by notice in writing that the Impact Reconciliation Procedure satisfies the requirements of condition 11-5.	Written Correspondence that the IRP satisfies the requirements of 11-5 from the CEO.	2025.1180.M11.6 Letter from DWER to Approval holder approving the IRP (Rev 1) (25 May 2022).	Pre-constructio n	Prior to ground disturbing activities.	CLD	The Proponent considers the requirements of this condition to be completed. IRP confirmed in writing by the CEO on 25 May 2022, advising the IRP satisfies condition requirements of 11-5.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								Ground disturbing activities commenced on the 11 July 2023.
1180: M11. 7	Offsets	The proponent: (1) may review and revise the Confirmed Impact Reconciliation Procedure; or (2) shall review and revise the Confirmed Impact Reconciliation Procedure as and when directed by the CEO by a notice in writing.	Written correspondence. Revised version of the IRP will be prepared and submitted to the CEO as and when directed by the CEO by a notice in writing. Revise IRP at the commencement of clearing to ensure dates for IRR submission are up to date, in accordance with Condition 11-7. Revise IRP when required by the CEO of EPA.	2025.1180.M11.7 Email noting that a revised IRP was submitted to EPA on the 17 November 2023. Email string also from Jack Goldie, requesting changes to IRP PCF2 19 March 2024.	Overall	As required by the Proponent or as directed / requested by the CEO.	C	(1) During the reporting period the Confirmed IRP (PCF1) was reviewed and revised. A revised IRP (Rev 2) was submitted to EPA on 17 November 2023 (outside the reporting period). 2025.1180.M11.7 notes receipt of the IRP by DWER on this date and included revised clearing activity dates and additional reporting period table to replace table 7 in IRP PCF1. (2) An email was sent by Jack Goldie (EPA/DWER) on 19 March 2024 noting that there were minor changes required to wording within the IRP PCF 2 submitted. Perdaman made the required changes and resubmitted the Plan as PCF3 in July 2024. PCF 3 is the latest revised version of the IRP, which was effective from the 28 June 2024.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								In accordance with this condition revised IRP's do not require the 'approval' by the CEO only to be submitted.
1180: M11. 8	Offsets	The proponent shall submit Impact Reconciliation Reports in accordance with the Confirmed Impact Reconciliation Procedure.	Submit Impact Reconciliation Reports as per required timeframe specified in the Impact Reconciliation Procedure.	Not Applicable	Overall	As specified by the IRP. First biennial reporting period 11 July 2023 to 30 June 2025. First Impact Reconciliation Report to be submitted by 30 October 2025.	NR	First biennial reporting period 11 July 2023 to 30 June 2025. First Impact Reconciliation Report to be submitted by 30 October 2025.
1180: M11. 9	Offsets	Despite payment of the provisional contribution, the proponent's liability to make a contribution under this condition shall be finally determined: (1) by the Minister upon application by the proponent in writing to the Minister to reduce in part or whole the proponent's liability under this condition where: (a) a payment has been made to satisfy a condition of an approval under the EPBC Act in relation to the proposal; and/or (b) the payment is made for the purpose of counterbalancing impacts of the proposal on matters of national	Proponent to submit an application to the Minister for exhaustion of liability if conditions of 11-9(a) and 11-9(b) are deemed applicable to the proponent. If no application is made within 12 months of the conclusion of the relevant biennial reporting period, payment will be equivalent to the provisional contribution.	Not Applicable	Overall	Within 12 months of the conclusion of the relevant biennial reporting period.	NR	This condition has not been triggered during the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		environmental significance identified in condition 11-1; or (2) to be equivalent to the provisional contribution if no application of the kind described in condition 11-9(1) is made within 12 months of the conclusion of the relevant biennial reporting period.						
Environmental Performance Reporting								
1180: M12. 1	Environmental performance report	The proponent shall submit an Environmental Performance Report to the Minister and the Murujuga Aboriginal Corporation every five years	Submission of an Environmental Performance Report to the Minister and the MAC.	Not Applicable	Overall	Every five years from commencement of GDA's.	NR	The first Environmental Performance Report is due 11 April 2028.
1180: M12. 2	Environmental performance report	The first Environmental Performance Report shall be submitted within three months of the expiry of the five-year period commencing from the first date of Ground Disturbing Activities, or such other time as may be approved by the CEO.	Submission of an Environmental Performance Report to the Minister and the MAC within three months of the expiry of the first five-year period commencing from the first date of GDA's, or such other time as may be approved by the CEO.	Not Applicable	Overall	Within three months of the expiry of the five-year period commencing from the first date of Ground Disturbing Activities, or such other time as may be approved by the CEO.	NR	Five years from the first date GDA commenced is 11 July 2028. The first report is due 11 April 2028.
1180: M12. 3	Environmental performance report	Each Environmental Performance Report shall report on proposal emissions and proposal impacts on the following environmental values: (a) state of rock art; (b) state of human health and amenity affected by proposal air emissions; (c) state of flora and vegetation; (d) state of terrestrial fauna; (e) state of groundwater;	Environmental Performance Report to include all provisions of 12-3 in response to monitoring and investigations regarding the applicable environmental values and their condition as per 12-4 over each 5-year period.	Not Applicable	Overall	Every five years from commencement of GDA's.	NR	Five years from the first date GDA commenced is 11 July 2028. The first report is due 11 April 2028.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(f) state of surface water; (g) state of social surroundings including noise, cultural heritage, traffic and landscape and visual amenity; and (h) state of the holistic environment.						
1180: M12.4	Environmental performance report	The Environmental Performance Report must include: (a) a comparison of the environmental values identified in condition 12-3 at the end of the five-year period; against the state of each environmental value at the beginning of the five year period; (b) a comparison of the environmental values identified in condition 12-3 at the end of the five-year period; against the state of the environmental values identified in first Environmental Performance Report submitted in accordance with condition 12-2; and (c) proposed Adaptive management and continuous improvement strategies.	Each Environmental Performance Report to include all provisions of 12-4 and include comparisons of the state of each environmental value to the first Environmental Performance Report.	Not Applicable	Overall	Every five years from commencement of GDA's.	NR	Five years from the first date GDA commenced is 11 July 2028. The first report is due 11 April 2028.
1180: M12.5	Environmental performance report	The Environmental Performance Report may be in whole, or part prepared in conjunction with other proponents where there are cumulative impacts from their proposals.	Determine where cumulative impacts from surrounding projects may affect the surrounding environmental values and liaise to prepare the Environmental Performance Report in conjunction with the details of other proponents impacts from their proposals.	Not Applicable	Overall	Every five years from commencement of GDA's.	NR	Five years from the first date GDA commenced is 11 July 2028. The first report is due 11 April 2028.
Decommissioning and rehabilitation								
1180: M13.1	Decommissioning and rehabilitation	At least five years prior to the forecasted completion of the operational phase of the proposal the proponent shall prepare and submit a Decommissioning and Rehabilitation Plan to the CEO for approval, on advice of the Murujuga Aboriginal Corporation, Department of	Prepare and submit a Decommissioning and Rehabilitation Plan to the CEO for approval with inclusion of management actions that ensure the proposal is decommissioned and	Not Applicable	Operation	At least five years prior to the forecasted completion of the operational phase of the proposal.	NR	Operations forecasted for completion in the year 2102.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		Biodiversity, Conservation and Attractions and the DPLH, to meet the following objective: (1) ensure the proposal is decommissioned and rehabilitated in an ecologically sustainable manner.	rehabilitated in an ecologically sustainable manner. Consultation with MAC, DBCA and the DPLH for advice on meeting the environmental objective of 13-1. Written correspondence with MAC, DBCA and the DPLH regarding decommissioning and rehabilitation advice.					
1180: M13. 2	Decommissioning and rehabilitation	The proponent must implement the most recent version of the Confirmed Decommissioning and Rehabilitation Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental objective in condition 13-1 has been met.	Written correspondence from the CEO that the proposal has demonstrated that environmental objectives detailed in condition 13-1 have been met.	Not Applicable	Overall	Until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 13-1 has been met.	NR	Operations forecasted for completion in the year 2102.
1180: M13. 3	Decommissioning and rehabilitation	After the submission of the Decommissioning and Rehabilitation Plan, the proponent is to include an update on the forecasted completion of the operational phase and decommissioning of the proposal in each subsequent Compliance Assessment Report required by condition 15-6.	Update the forecasted completion of operations in each subsequent CAR from the submission of the Decommissioning and Rehabilitation Plan.	Not Applicable	Overall	After the submission of the Decommissioning and Rehabilitation Plan.	NR	Operations forecasted for completion in the year 2102.
1180: M13. 4	Decommissioning and rehabilitation	The proponent, in consultation with the Murujuga Aboriginal Corporation, the Department of Biodiversity, Conservation and Attractions and the DPLH: (1)may review and revise the Confirmed Decommissioning and Rehabilitation Plan and submit it to the CEO; and	Consultation with MAC when revisions to the Confirmed Decommissioning and Rehabilitation Plan are made. Written correspondence.	Not Applicable	Overall	As required by the Proponent or as directed / requested by the CEO.	NR	Operations forecasted for completion in the year 2102.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(2)shall review and revise the Confirmed Decommissioning and Rehabilitation Plan and submit it to the CEO as and when directed by the CEO by a notice in writing.	Revised version of the Confirmed Decommissioning and Rehabilitation Plan will be prepared in consultation with MAC and submitted to the CEO.					
Time Limit for Proposal Implementation								
1180: M14. 1	Time limit for proposal implement ation	The proponent shall not commence implementation of the proposal after five years from the date of this Statement, and any commencement, prior to this date, must be substantial.	Implementation of the proposal must occur within 5 years of the issue of Ministerial Statement No. 1180. Implementation that is to occur prior to this date must be substantial (in substantial motion).	2025.1180.M3.3c Commencement of Ground Disturbance letter to DCCEEW.	Overall	By 24 January 2027.	CLD	The proponent considers the requirements of this condition to be completed. Implementation of the proposal began with the relocation of heritage items in April 2023 and on the 11 July 2023 clearing commenced.
1180: M14. 2	Time limit for proposal implement ation	By the date that is five years from the date of this Statement, the proponent shall notify the CEO in writing of the date of substantial commencement of the proposal, together with reasons why that date has been selected.	Notify the CEO in writing of the date of substantial commencement and the reasoning behind selection of this date.	NA	Overall	By 24 January 2027.	NR	Not required during the reporting period. Implementation of the proposal began with the relocation of heritage items in April 2023 and on the 11 July 2023 when clearing commenced. Civil works commenced on the 25 June 2024 (when works approval W6785/2023/1 was granted). Five years from the date of the statement is 24 January 2027. Therefore,

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								the Proponent must notify the CEO in writing of the date of substantial commencement of the proposal, together with reasons why that date has been selected by the 24 January 2027.
Compliance Reporting								
1180: M15. 1	Compliance reporting	The proponent shall prepare, and maintain a Compliance Assessment Plan, which is submitted to the CEO at least six months prior to the first Compliance Assessment Report required by condition 15-6, or prior to Ground Disturbing Activities, whichever is sooner.	Prepare CAP (this document) in accordance with approval and guideline requirements.	Not Applicable	Pre-construction	At least six months prior to the first Compliance Assessment Report required by condition 15-6, or prior to Ground Disturbing Activities, whichever is sooner.	CLD	The proponent considers the requirements of this condition to be completed. The Compliance Assessment Plan submitted to the CEO on 12 February 2022 outside this reporting period. Compliance Assessment Plan approved by the CEO on 17 March 2022. Ground disturbance commenced on 11 July 2023. The first CAR was required on the 24 April 2023 (in accordance with condition 15.6)
1180: M15. 2	Compliance reporting	The Compliance Assessment Plan shall indicate: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments;	Prepare CAP (this document) in accordance with approval and guideline requirements.	2025.1180.M15.2_ Approval Letter	Overall	Annually from the date of submission of the first Compliance Assessment Report (condition 15-6), or at	C	The proponent remains compliant with this condition during the reporting period. Compliance Assessment Plan approved by the CEO on 17 March 2022 and determined to meet

Type text

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.				another time agreed in writing by the CEO.		the requirements of condition 15-2 (this condition).
1180: M15.3	Compliance reporting	The proponent shall assess compliance with conditions in accordance with the Confirmed Compliance Assessment Plan.	This CAP and this Audit Table Template completed with status (Appendix A to the CAP). CAR prepared in accordance with approved CAP.	2024 CAR https://www.perdamanindustries.com.au/wp-content/uploads/2024/06/MS-1180-Compliance-Assessment-Report-Period-2023-2024.pdf 2023 CAR https://www.perdamanindustries.com.au/wp-content/uploads/2023/08/Compliance-Assessment-Report-April-2023.pdf	Overall	Annually from the date of submission of the first Compliance Assessment Report, or at another time agreed in writing by the CEO.	C	This CAR (PCF-PD-EN-CAR_2025) has been prepared in accordance with the Confirmed Compliance Assessment Plan. The Proponent has assessed the compliance against each condition in accordance with the Confirmed CAP, as evidenced by this CAR, CAR 2024, CAR 2023.
1180: M15.4	Compliance reporting	All Compliance Assessment Reports shall be retained until the Proposal is fully implemented (including decommissioning and rehabilitation) or such other period agreed in writing by the CEO.	All CARs shall be retained for a minimum of seven years following the end of the life of the proposal.	2024 CAR https://www.perdamanindustries.com.au/wp-content/uploads/2024/06/MS-1180-Compliance-Assessment-Report-Period-2023-2024.pdf	Overall	Until the Proposal is fully implemented (including decommissioning and rehabilitation) or such other period agreed	C	This CAR (PCF-PD-EN-CAR_2025), and the two previous CARs for the reporting periods January 2023 to January 2024 (PCF-PD-EN-CAR_2024) and January 2022 to January 2023 (PCF-PD-EN-CAR_2023) are retained on the Projects SharePoint electronically.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
				2023 CAR https://www.perdamanindustries.com.au/wp-content/uploads/2023/08/Compliance-Assessment-Report-April-2023.pdf		in writing by the CEO.		The CAR's will be retained within the Electronic system for the life of the Project, or such other period agreed by the CEO. The CAR's are also available on the Project CERES website for the life of the Proposal.
1180: M15.5	Compliance reporting	The proponent shall advise the CEO of any potential non-compliance within seven days of that non-compliance being known to the proponent.	Proponent to notify in writing of any potential non-compliance to the CEO.	2024 CAR Section 3.3 *Details of Non-Compliance* https://www.perdamanindustries.com.au/wp-content/uploads/2024/06/MS-1180-Compliance-Assessment-Report-Period-2023-2024.pdf 2025.1180.M15.5 Email to DWER submitting the CAR 2024 which advises CEO of Non-compliances in section 3.3 of the CAR, and letter submitting the CAR dated 24 April 2024.	Overall	Within seven days of that non-compliance being known to the proponent.	C	During the preparation of the 2023-2024 Period CAR, three (3) non-compliances were identified. The non-compliances with Conditions 3-6, 3-11, and 15-6 were included in the CAR (PCF-PD-EN-CAR_2024) within section 3.3 *Details of Non-compliance(s) and/or Potential Non-compliance(s*) Proponent identified and confirmed the non-compliances on the 22 April 2024, the corresponding CAR which included the non-compliances was provided to CEO via email on the 24 April 2024. These were provided to the CEO within seven

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								days of the non-compliance being known to the proponent.
1180: M15. 6	Compliance reporting	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen months from the date of issue of this Statement addressing the twelve-month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or at another time agreed in writing by the CEO.	Submit to the CEO the first CAR fifteen months from the date of issue of Ministerial Statement No. 1180. Submit to the CEO subsequent CAR's annually from the first CAR submitted.	2025.1180.M15.6a (Email to DWER submitting the CAR 2022-23). 2025.1180.M15.5 Email to DWER submitting the 2023-24 CAR dated 24 April 2024.	Overall	By 24 April 2023 and then annually from the date of submission of the first Compliance Assessment Report, or at another time agreed in writing by the CEO.	C	The CAR for the Period 2023 – 2024 (CAR within this reporting period) was submitted to DWER on 24 April 2024, one year following the intended submission date of the first CAR. The submission of the second CAR is in compliance with this condition. The first CAR was submitted to DWER (EPA) on 26 April 2023, two (2) days overdue, this was reported in the 2024 CAR as non-compliant with this condition. This non-compliance was identified by DWER and Perdaman was sent a letter by DWER, of missing the due date of 24 April 2023.
1180: M15. 7	Compliance reporting	Each Compliance Assessment Report shall: (1) be endorsed by the proponent's Chief Executive Officer or a person delegated	CEO or representative of the CEO to endorse each CAR. CAR to include statement regarding whether proponent	This CAR (PCF-PD-EN-CAR_2025) 2024 CAR https://www.perda	Overall	Annually from the date of submission of the first Compliance	C	(1) Each CAR submitted to date, has included endorsement by the Proponents CEO, Mr Vikas Rambal, on page 2

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		to sign on the Chief Executive Officer's behalf; (2) include a statement as to whether the proponent has complied with the conditions; (3) identify all potential non-compliances and describe corrective and preventative actions taken; (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 15-2.	has complied with Ministerial Statement 1180 conditions, identifying all potential non-compliances and description of preventative actions to be taken if non-compliances are identified. The CAP must be revised to reflect any changes made to the Proposal and changes to conditions within MS 1180. All CARs to be made publicly available through the Perdaman Project Destiny webpage within a reasonable time frame following completion of the report.	manindustries.com.au/wp-content/uploads/2024/06/MS-1180-Compliance-Assessment-Report-Period-2023-2024.pdf 2023 CAR https://www.perdamanindustries.com.au/wp-content/uploads/2023/08/Compliance-Assessment-Report-April-2023.pdf		Assessment Report, or at another time agreed in writing by the CEO.		and at the bottom of every page which requires such. (2) Each CAR submitted to date, has included section 3 which is the Proponents statement of compliance. (3) Each CAR submitted to date has included a Section 3.3 *Details of Non-compliance(s) and/or Potential Non-compliance(s)*. The 2023 CAR did not identify non-compliances. The 2024 and 2025 (this CAR) includes details of all potential non-compliances and describes corrective and preventative actions taken. (4) All CARs prepared to date are available on the Project CERES Website, which is publicly accessible (refer to links in evidence). (5) There have been no changes to the CAP proposed in any of the CARs submitted to date.
1180: M15.8	Compliance reporting	The proponent: (1) may review and revise the Confirmed Compliance Assessment Plan; and	Revised version of the CAP will be prepared and submitted to the CEO.	Not Applicable.	Overall	As and when directed by the CEO.	NR	No revisions and changes have been made to the CAP during the reporting period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(2) shall review and revise the Confirmed Compliance Assessment Plan as and when directed by the CEO.						
1180: M15.9	Compliance reporting	The proponent shall implement the latest revision of the Confirmed Compliance Assessment Plan.	The latest CAP version to remain implemented during revisions before amendments are made to the newest version to be implemented upon approval by the CEO.	Attachment A.MS1180.IS_CAP	Overall	From the date of submission of the first Compliance Assessment Report, or at another time agreed in writing by the CEO.	C	The Confirmed Compliance Assessment Plan which was approved by the CEO on 17 March 2022 remains the Confirmed CAP being implemented during the reporting period. Refer to Attachment A.MS1180.IS_CAP
Public Availability of Data								
1180: M16.1	Public availability of data	Subject to condition 16-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal, the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	The proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps), management plans and reports relevant to the assessment of this proposal and implementation of Ministerial Statement No. 1180.	https://www.perdamanindustries.com.au/environment/	Overall	Within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal.	C	There are various figures, surveys, assessments and management plans publicly available on the Proponents website. The latest Confirmed Cultural Heritage Management Plan, Confirmed Greenhouse Gas Plan, Air Quality Management Plan (not confirmed) **are all provided** on the website. The following Confirmed Management Plans **are not** provided on the website as per this condition, specifically " *implementation of this statement"*.

AUDIT TABLE

PROPOSAL: Perdaman Urea Project

STATEMENT: 1180

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								- Confirmed Surface Water Management Plan (PCF4) - Confirmed Flora Management Plan (PCF3) - Confirmed Fauna Management Plan (PCF5) - Confirmed - Impact Reconciliation Procedure (PCF3) - Confirmed Threatened Species Management Plan (PCF6) Perdaman will provide these on the website to ensure compliance with the part of the condition which requires that within a reasonable time period plans relevant to the assessment of this proposal and implementation of this Statement will be publicly available. Note that Perdaman has provided an email contact on the webpage containing the plans, so that if the public require further information and/or access to plans, this can be requested.

AUDIT TABLE

PROPOSAL: Perdaman Urea Project

STATEMENT: 1180

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1180: M16. 2	Public availability of data	If any data referred to in condition 16-1 contains particulars of: (1) a secret formula or process; or (2) confidential commercially sensitive information; the proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.	Submission of a request for approval from the CEO to not make sensitive or secret data publicly available, providing justification as to why the approval is being sought.	Not Applicable	Overall	At the discretion of the CEO.	NR	The proponent has not submitted a request to the CEO for approval to not make these plans, data and reports available to the public during the reporting period.

C. Appendix C – Supporting / Verifying Information

Table 9 Supporting/Verifying Information

Type of Information	Document Code	Document Title / Information description.
Figure (Map)	2025.1180.M1a	Project Development Envelope.
Figure (Map)	2025.1180.M1b	Native Vegetation clearing undertaken within the development envelope 72.00 Ha.
Figure (Map)	2025.1180.M1c	Project Disturbance Footprint demonstrating avoidance of Cultural Heritage Sites IDs 9439, 26008, 9296, and MAC 004.
Document	2025.1180.M1d	Causeway construction has been completed. Culvert outflow velocities of less than 1.0 m/s have been met.
Management Plan	2025.1180.M2.1a	Construction Environmental Management Plan rev 4.
Management Plan	2025.1180.M2.1b	Construction Environmental Management Plan rev 3.
Management Plan	2025.1180.M2.1c	Portside Construction Environmental Management Plan rev 0.
Letter	2025.1180.M3.3a	Confirmed GHGMP Approval Letter from CEO dated 17 May 2022 - (via Letter Your ref: PCF-PD-EN-GHGMP Our ref: DWERVT9522).
Letter	2025.1180.M3.3b	Letter from Perdaman to DCCEEW notifying that GDA had commenced 11/07/2023. Letter dated 14 July 2023 (PCF-LTR-DCCEEW-00001).
Letter	2025.1180.M3.5a	Letter from Perdaman to DCCEEW notifying that GDA had commenced 11/07/2023. Letter dated 14 July 2023 (PCF-LTR-DCCEEW-00001).
Website Link	2025.1180.M3.11a	Publication of most recent GHGMP on the Proponent's Project Website. https://www.perdamanindustries.com.au/wp-content/uploads/2023/05/PCF-PD-EN-GHGMP_PCF5.pdf
Figure (Map)	2025.1180.M4.1a	2025 Project Clearing Allocations. Native Vegetation Clearing in the development envelope and extent of clearing within PEC rock pile communities.
Email	2025.1180.M4.1b	Email correspondence GDP Clearing assessment.
Letter	2025.1180.M4.3	Submission (21/02/2022) of the revised Confirmed FMP to CEO/DWER noted within the Approval letter.
Letter	2025.1180.M4.4	Written correspondence from CEO advising that the FMP satisfies Condition 4-7 and ground disturbance can commence.
Figure (Map)	2025.1180.M5.1	2025 Project Clearing Allocations. This figure demonstrates the proposal clearing extents for each habitat type listed in outcome 5-1.
Document	2025.1180.M5.2a	Fauna Trapping and Translocation Schedule
Register	2025.1180.M5.2b	Copy of PR25_BIO_FaunaRegisterOriginalFormat_2024, saved within 'Ref_6' folder]
Report	2025.1180.M5.2c	Threatened Species Risk Assessment Report (GHD 2023)
Letter/Email	2025.1180.M5.4	Confirmed Fauna Management Plan Letter Approved from DWER to Perdaman (DWERVT9574) (Dated 7 July 2022).

Letter	2025.1180.M5.6a	Notification of Threshold non-compliance to CEO and DCCEEW.
Email	2025.1180.M5.6b	Email submitting the exceedance notification letter to CEO/DWER.
Letter	2025.1180.M5.8a	Letter submitting PCF6 TSMP to DCCEEW
Document	2025.1180.M5.8b	Evidence of MAC consultation on TSMP PCF6
Email	2025.1180.M5.8c	Email submitting PCF6 TSMP and letter to CEO.
Letter	2025.1180.M6.2	Submission of the Project Destiny Baseline Hydrogeological Assessment.
Management Plan	2025.1180.M7.2	Acid Sulfate Soils Management Plan (PCF-PD-EN-ASSDMP_PCF2 7 January 2025)
Figure	2025.1180.M8.1.NC	Figure of surface water locations in accordance with the SWMP.
Letter	2025.1180.M8.2	Letter from CEO approving the SWMP dated 13 July 2022.
Report	2025.1180.M9.1	EPA Non-achievement Further Report for Management Targets 15 & 16 of the Confirmed CHMP (PCF6).
Letter	2025.1180.M9.2	Cultural Heritage Management Plan Approval letter by the CEO on 22 June 2022.
Letter	2025.1180.M9.4a	Non-Achievement of management targets 15 & 16 in CHMP Notification Letter to DWER.
Letter	2025.1180.M9.4b	Letter to CEO submitting a revised CHMP (version PCF8) dated 22 March 2024.
Email	2025.1180.M9.4c	Email submitting the Non-achievement notification to DWER
Letter	2025.1180.M9.5a	Non-Achievement of management targets 15 & 16 in CHMP Notification Letter to DWER.
Document	2025.1180.M9.5b	Further Report
Email	2025.1180.M9.5c	Email submitting the letter and further report.
Letter	2025.1180.M9.8a	Letter to CEO notifying a revised CHMP will be submitted (version PCF8) dated 9 February 2024.
Letter	2025.1180.M9.8b	Notification of CHMP changes
Email	2025.1180.M9.8c	Email submitting the Letter and CHMP PCF8 to CEO.
Document	2025.1180.M9.8d	Evidence of MAC consultation for revision of CHMP (version PCF8)
Letter	2025.1180.M10.2	Letter from CEO confirming LMP meets requirements of condition 10-2.
Letter	2025.1180.M11.6	Letter from DWER to Approval holder approving the IRP (Rev 1) (25 May 2022). Letter notes that the IRP was submitted to DWER on the 30 March 2022.

Email	2025.1180.M11.7	Email noting that a revised IRP was submitted to EPA on the 17 November 2023. Email string also from Jack Goldie, requesting changes to IRP PCF2 19 March 2024.
Letter	2025.1180.M15.2	Letter from DWER to Perdaman noting submission of the CAP (12 February 2022) and approval of the CAP.
Email	2025.1180.M15.5	Email to DWER submitting the CAR 2024 which advises CEO of Non-compliances in section 3.3 of the CAR, and letter submitting the CAR dated 24 April 2024.
Email	2025.1180.M15.6	Email to DWER submitting the CAR 2023.

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