



Warrawoona Gold Project Compliance Assessment Report

Ministerial Statement 1150
20/08/2020 – 19/08/2021



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Warrawoona Gold Project
Ministerial Statement 1150

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Executive Summary

Calidus Resources Limited commenced site works at the Warrawoona Gold Project on the 27th February 2021 after receiving Mining Proposal and Mine Closure Plan approval from DMIRS. These were the final permits required to commence the Project.

During the reporting period, site activities were predominantly focussed on construction of the processing plant, tails dam, with some mining (including drill and blast) activities occurring.

Calidus does not consider any non-compliance's to have occurred, however in the interest of full transparency has reported one occurrence of not recording a blast due to software issues which have since been resolved.

1 Introduction

Calidus Resources Limited (Calidus) is currently developing the Warrawoona Gold Project (WGP), located in the Pilbara, approximately 20km south of Marble Bar (**Error! Reference source not found.**).

The WGP was formally assessed under part IV of the Western Australian Environmental Protection Act and the Commonwealth *Environment Protection and Biodiversity Act* (EPBC Act). The WGP proposal was referred to the Environment Protection Agency 29 October 2019 (EPA Assessment No. 2229), and subsequently approved 20 August 2020 (Ministerial Statement 1150)(Table 1 and Table 2).

Two subsequent amendments to MS 1150 have been submitted and approved. Table 3 shows the submission dates of these amendments and changes to the authorised extents. Whilst Amendment 2 was not approved during the reporting period, it has been included in this summary to offer a complete description of requested and approved changes to the original approved MS 1150.

This Compliance Assessment Report addresses the reporting period of 20 August 2020 to 19th August 2021.

Table 1. Summary of the Original Proposal (MS1150 Schedule 1, Table 1)

Proposal Title	Warrawoona Gold Project
Short Description	Develop and operate an open cut and below ground gold mine, processing facility, associated mining infrastructure, waste rock dumps, tailings storage facility, borefield, and accommodation camp within the Warrawoona Gold Project area, located 20km south of Marble Bar.

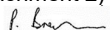
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Table 2. Authorised extent of the Original Proposal up until 19 August 2021

Element	Authorised Extent
Physical elements	
Mine and associated infrastructure	Clearing no more than 398ha of native vegetation within the 1,000ha development envelope.
Operation elements	
Groundwater abstraction	Abstraction of no more than 1.6 gigalitres per annum from bore fields and mine pit dewatering.
Waste rock	20 million loose cubic metres (LCM) at Klondyke and 300,000 LCM at Copenhagen.
Ore processing (waste)	Disposal of no more than 2.5 million tonnes per annum of tailings into the tailings storage facility*.

Table 3. Ministerial Statement 1150 Approval and Amendment History

Approval	Application Date	Granted	Previously Extent	Authorised	Authorised Extent
Original Submission	29/10/2019	20/08/2020	N/A		Appendix YY
Amendment 1	02.12/2020	01/04/2021	Production throughput of 2.0Mtpa	Production throughput of 2.5Mtpa	Production throughput of 2.5Mtpa
Amendment 2	06/04/2021	14/09/2021*	Clearing no more than 398 ha of native vegetation within the 1,000ha development envelope. Abstraction of no more than 1.6 gigalitres per annum from borefields and mine pit dewatering 20 million loose cubic metres (LCM) at Klondyke and 300,000 LCM at Copenhagen Disposal of no more than 2.5 million tonnes per annum of tailings into the tailings storage facility.	Clearing no more than 490 ha of native vegetation within the 1,124ha development envelope Abstraction of no more than 1.6 gigalitres per annum from borefields and mine pit dewatering 20 million loose cubic metres (LCM) at Klondyke and 300,000 LCM at Copenhagen Disposal of no more than 2.5 million tonnes per annum of tailings into the tailings storage facility.	

*Approval was granted after the reporting period had finished

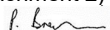
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Figure 1. Regional Overview

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1.1 Objective

This Compliance Assessment Report (CAR) has been compiled to address Condition 4-6 of MS1150 which states:

The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO.

The 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 4-1.*

This is the first CAR produced and submitted for the WGP and MS1150, with a reporting period of 20 August 2020 to 19th August 2021 and a submission date of the 20 November 2021. It has been developed in accordance with the Compliance Assessment Plan (CAP) which was revised and approved 8 April 2021 (Appendix YY).

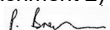
A request was submitted to the Chief Executive of DWER on the 19 November 2021 for an extension of the due date of this CAR to 3 December 2021.

2 Summary of Implementation Status

During the reporting period, WGP was still under construction. Construction work began on 27th February 2021 with the initial clearing for the processing plant. During the reporting period the following key items were still being built:

- Processing Plant
- Tailings Dam
- Pre strip of the mining pits
- Miscellaneous items such as roads

It is expected that the processing plant will be completed in March 2022, tailings dam completed in November 2021, whilst the pre strip of the mining pits will continue across the life of the project.

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3 Statement of Compliance

1 Proposal and Proponent Details

Proposal Title	Warrawoona Gold Project
Statement Number	Ministerial Statement 1150
Proponent Name	Calidus Resources Limited
Proponent's Australian Company Number (where relevant)	006 640 553

2 Statement of Compliance Details

Reporting Period	20/08/20 to 19/08/21
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Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input type="checkbox"/>	Construction	<input checked="" type="checkbox"/>	Operation	<input type="checkbox"/>	Decommissioning	<input type="checkbox"/>

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	Appendix A & B
<p>An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table must be prepared and maintained in accordance with the Department of Water and Environmental Regulation (DWER) <i>Post Assessment Guideline for Preparing an Audit Table</i>, as amended from time to time. The 'Status Column' of the audit table must accurately describe the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms that may be used by the proponent in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.</p>	

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)			
No (please proceed to Section 3)	<input checked="" type="checkbox"/>	Yes (please proceed to Section 4)	<input type="checkbox"/>

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

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

Non-compliance/potential non-compliance 3-1

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Which implementation condition or procedure was non-compliant or potentially non-compliant?	
1150:M7.1 – Significant Species Management Plan (SSMP)	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Potentially non-compliant. Blast data for one event cannot be provided as it was not recorded. Blast was a similar size to previous blast, and subsequent blasts, which resulted in measurements recorded at Klondyke Queen that were significantly below those specified in the SSMP (average of 0.32mm/s and 46dB vs limits of 10mm/s and 70dB). It is therefore a reasonable assumption that the missed blast event measurement, was also significantly below the targets specified in the SSMP.	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
15/07/2021	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally Date _____ <input checked="" type="checkbox"/> Reported to DWER in writing Date 01/12/2021	<input type="checkbox"/> No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
The blast monitor/microphone over triggered due to prevailing high winds and a low trigger level set for the microphone (set to record at 50dB).	
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)	
Easting -799532 Northing - 7637984	
What was the cause(s) of the non-compliance or potential non-compliance?	
Windy conditions and the trigger level for the microphone was set too low, causing the unit to over trigger.	
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?	
Microphone trigger level was raised to 60dB.	
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?	
It was unknown that the outcome of over triggering due to prevailing wind was likely to occur, until it did. Previously, the unit had not over triggered. Since raising the trigger level, over triggering has not occurred again.	
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:	
<ul style="list-style-type: none"> in the reporting period addressed in this Statement of Compliance; and 	

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- 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)

See Appendix C for emails from Saros, host of the blast recording database.

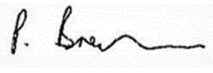
For additional non-compliance or potential non-compliance, please duplicate this page as required.

4 Proponent Declaration

I, Paul Brennan, Chief Operating Officer of Calidus Resources Limited, *(full name and position title)*

declare that I am authorised on behalf ofCalidus Resources Limited.....

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

Signature:.....  Date:.....01/12/2021.....

Please note that:

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

5 Submission of Statement of Compliance

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

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

6 Contact Information

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

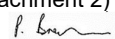
Manager, Compliance (Ministerial Statements)

Department of Water and Environmental Regulation
 Postal Address: Locked Bag 10
 Joondalup DC
 WA 6919

Phone: (08) 6364 7000
 Email: compliance@dwer.wa.gov.au

7 Post Assessment Guidelines and Forms

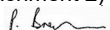
Post assessment documents can be found at www.epa.wa.gov.au

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ATTACHMENT 1

Table 4 Compliance Status Terms

Compliance Status Terms	Abb rev	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> audit elements have a finite period of application (e.g. construction activities, development of a document); the action has been satisfactorily completed; and the DWER has provided written acceptance of '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 finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	<p>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</p> <p>The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).</p>

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ATTACHMENT 2

An audit table for the Statement addressed in the Statement of Compliance must be provided as Attachment 2. The audit table is provided in Appendix A and Appendix B. The audit table has been prepared and maintained in accordance with the OEPA's Post Assessment Guideline for Preparing and Audit Table (OEPA 2012b). The 'Status Column' describes the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance (20 August 2020 to 19 August 2021). The terms used in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1 above

4 Details of Declared Compliance Status

Table 5 shows the compliance status of key characteristics from Schedule 1 of MS1150. This excludes Amendment 2 from Table 3 so that it only reflects the approval and compliance status during the reporting period of 20 August 2020 to 19th August 2021.

Complete compliance status of all conditions of MS 1150 are outlined in Appendix A and Appendix B.

Table 5. Compliance Status of Key Characteristics

Audit Code	Subject	Requirement	Status	Further Information	
1150:M1.1	Proposal implementation	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.	Compliant.	The proposal has been implemented in accordance with all elements listed in Column 4, Table 2 of Schedule 1.	
		Key Characteristic	Description		
		Clearing	Up to 398 hectares	Compliant.	129.83ha cleared during the reporting period. Figure/Appendix YY
		Groundwater abstraction	Up to 1.6 GL	Compliant.	0.08 GL abstracted during the reporting period
		Waste rock	20,000,000 LCM at Klondyke and 300,000 LCM at Copenhagen	Compliant.	11,024 LCM
	Ore processing (waste)	Production throughput of 2.5Mtpa	Compliant.	Processing had not begun during the reporting period.	

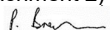
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4.1 Environment Management Plans

Status of and performance against the Significant Species Management Plan (SSMP) is located in Table 6. The Impact Reconciliation Procedure (IRP) is only reported biannually. The first Impact Reconciliation Report is due 30 October 2022 and will be addressed in the 2022 CAR.

Table 6. Status of Compliance against the SSMP

Number	Performance Objective	Targets	Management Actions	Status	Further Information
1	No unauthorised mining or clearing within the Mining Exclusion Zone	No clearing outside the Development Envelope	Check demarcation of areas to be cleared/not cleared has been undertaken and is obvious to those on the ground.	Compliant	Appendix D
			Identify likely cause of incident.		
			Implement relevant corrective actions.		
			Report to relevant government authorities.		
2	No unauthorised mining or clearing within the Klondyke Buffer Zone and Mining Exclusion Zone	No clearing outside the Development Envelope	Check demarcation of areas to be cleared/not cleared has been undertaken and is obvious to those on the ground.	Compliant	Appendix D
			Identify likely cause of incident.		
			Implement relevant corrective actions.		
			Report to relevant government authorities.		
3	No unauthorised mining or clearing near Bow Bells South	No clearing outside the Development Envelope	Check demarcation of areas to be cleared/not cleared has been undertaken and is obvious to those on the ground.	Compliant	Appendix D
			Identify likely cause of incident.		
			Implement relevant corrective actions.		
			Report to relevant government authorities.		
4	No roadkill incidents of conservation significant fauna.	No incident reports of roadkill incidents of conservation significant fauna.	Identify likely cause of incident.	Compliant	
			Review speed limits and driving procedures.		
			Review number of and locations of fauna signposts.		

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Number	Performance Objective	Targets	Management Actions	Status	Further Information
			Consider undertaking further education and awareness training.		
5	No more than 398 ha will be cleared within the Development Envelope.	No clearing of more than 398ha. No clearing outside the Development Envelope.	Check demarcation of areas to be cleared/not cleared has been undertaken and is obvious to those on the ground. Identify likely cause of incident. Implement relevant corrective actions. Report to relevant government authorities. Undertake corrective rehabilitation.	Compliant	Appendix D
6	Undertake Northern Quoll monitoring on an annual basis.	Monitoring conducted in accordance with methods specified in Appendix 7A and 7B.	Investigate reason for monitoring not to have been undertaken and implement corrective measures to ensure future compliance is achieved. Review Monitoring Procedure to ensure it achieves the desired outcome.	Compliant	Appendix E
7	Minimise disturbance to Ghost Bats as a result of the project.	No permanent abandonment of Klondyke Queen roost by Ghost Bats as a result of the project	Contingency measures such as regulation of blast size, frequency or timing will be considered if roost abandonment occurs and can be attributed to blasting activities. Maintaining a 70 decibel A noise limit and 10 millimetres per second vibration limit at Klondyke Queen roost. Pre-clearance SOPs for old workings (Appendix 9).	Potentially Non-Compliant	During the reporting period four blasts occurred. All blasts recorded were compliant with the 70dB and 10mm/s limits. One blast was not recorded due to excess triggering of the microphone by prevailing winds causing the monitoring system to shut down prior to the scheduled blast. The trigger value for the microphone was adjusted to 60 dB (up from 50dB) to prevent a recurrence of this issue. Appendix C
8	Minimise disturbance to Pilbara Leaf-nosed Bats as a result of the project.	No abandonment of Bow Bells South roost by Pilbara Leaf-nosed Bats as a result of the	Contingency measures such as regulation of blast size, frequency or timing will be considered if roost abandonment occurs and	Compliant	Appendix F

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Number	Performance Objective	Targets	Management Actions	Status	Further Information
		project. Average humidity records are not to fall below a percentage as determined from baseline monitoring.	can be attributed to blasting activities. Maintaining a 70 decibel A noise limit and 10 millimetres per second vibration limit at Bow Bells South.		This management action does not appear in MS1150 or anywhere else in the SSMP, apart from Table 9.1 It looks to be a typo from transferring information relating to Klondyke Queen across to Bow Bells. No blast monitor or microphone have been installed at Bow Bells, which is located approximately 4km northwest of the nearest blast and hence the Klondyke Queen roost. Appendix D SSMP will be updated to remove this management action and resubmitted for approval.
			Pre-clearance SOPs for old workings (Appendix 9).		The 5 historical workings granted permission for removal in MS1150 and the Pre-clearance SOP were backfilled during April 2021 as per the Pre-Clearance SOP. Appendix G. An additional working was granted in MS1150 Amendment 2, however this occurred after the reporting period of this report. As of the end of the reporting period (19 August 2021) this adit has not

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Number	Performance Objective	Targets	Management Actions	Status	Further Information
					yet been backfilled.
			Monitoring of groundwater drawdown and annual recalibration of groundwater model to map the cone of depression and it's proximity to Bow Bells South as per Groundwater Management Procedures (CRL-ENV-PRO-021-19).		Groundwater model to be recalibrated after 12 months of operation. Projected to occur Q1/Q2 2022. Original modelling Appendix H.
			Should the humidity and the groundwater monitoring data and the recalibrated model indicate that groundwater levels in the Bow Bells South workings or in the adjacent monitoring bore (if installed) are likely to be impacted at any time by mine dewatering, to the extent that water levels are at risk of falling below the base of the mine workings, Calidus will commission a programme of works to install a nearby groundwater supply with associated pipework infrastructure to provide a small, permanent makeup flow to the Bow Bells South workings to maintain internal humidity levels. At completion of operations make-up flow will be maintained until monitoring data shows that groundwater levels have returned to a level that maintains an acceptable humidity range as determined by baseline humidity monitoring and Pilbara Leaf-nosed Bat monitoring. The groundwater model will be checked 12 months prior to closure to allow makeup flow requirements through closure to be planned for. The optimum rate of flow to the workings will be determined from an eco-hydrogeological study which would be undertaken by Calidus.	Not required at this stage	Groundwater model to be recalibrated after 12 months of operation. Projected to occur Q1/Q2 2022. Original modelling Appendix H. Humidity averages to be calculated prior to Klondyke Open Pit dewatering activities. Dewatering activities had not yet begun during the reporting period.
9	Undertake Pilbara Leaf-nosed and Ghost Bats monitoring on a continuous basis during preconstruction,	Monitoring is undertaken as per Standard Operating Procedures developed by a suitably qualified	Investigate reason for monitoring not to have been undertaken and implement corrective measures to ensure future compliance is achieved.	Compliant	All monitoring undertaken by external consultant Bob Bullen. Appendix F.

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Number	Performance Objective	Targets	Management Actions	Status	Further Information
	life of mine through to closure	Ecologist utilising a combination of Bat Recorder and video recording at Bow Bells South, Criterion, Dawson City, Klondyke Boulder, Klondyke Queen, Mullins (adit), two reference sites (Comet and Trump), and impact sites (such as TSF) (Appendix 6) and 8A.	Review Monitoring Procedure to ensure it achieves the desired outcomes.	Compliant	All monitoring undertaken by external consultant Bob Bullen. Appendix F.
		Upper and Lower Control Limits (UCL and LCL) are in development and are currently referred to as Draft Upper and Lower Control Limits (UCL and LCL). Prior to commencement of mining operation, UCL and LCLs will be finalised and, call numbers for each site will be compared to level 1, 2 and 3 trigger values being longterm UCL/LCL, mean +/- 2sd and +/- 3sd respectively (refer to Appendix 8B)	For survey events that exceed the trigger values, further interrogation of the call data will be undertaken to understand what may have caused the variation. Investigative themes will include clearing activities, blasting, TSF decant WAD cyanide concentration, dewatering activities, natural phenomenon such as rain events, dry periods, moon phase and seasonality.	Compliant	UCL and LCL were removed from the AWE Approval and MS1150 Appendix I. SSMP will be updated to reflect this change.
10	Undertake research on Pilbara Leaf-nosed and Ghost Bat utilisation of Open Pit Waters – using Copenhagen	Bats recorded at Copenhagen over different time period especially post dry season.	Investigate reason for monitoring not to have been undertaken and implement corrective measures to ensure research occurs.	Compliant	Copenhagen is included in the current bat monitoring. Appendix F. Baseline bat tissue arsenic levels have been sampled. Appendix J.
		Refer to above regarding Upper and Lower Control Limits (UCL and LCL) trigger values that are in development, to be finalised prior to the commencement of mining (Appendix 8A and 8B).	See above for survey events that exceed the trigger values.	Compliant	UCL and LCL were removed from the AWE Approval and MS1150. Appendix I. SSMP will be updated to reflect this change.
11	Minimise likelihood of	CNWAD monitoring as per	Identify likely cause of incident or reason for	Not required at this stage	As of the end of the reporting

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Number	Performance Objective	Targets	Management Actions	Status	Further Information
	Cyanide poisoning to Significant Fauna as a result of the project.	the TSF and Cyanide Management Procedure (CRL-ENV-PRO-019-19) As per TSF and cyanide management protocols, fauna monitoring at the TSF will occur twice a day to observe and record wildlife usage. One patrol will be conducted after dawn and the other in late afternoon.	monitoring not to have been undertaken. Review TSF and cyanide management protocols. Implement corrective measures to ensure future compliance is achieved. Any exceedance of the 30mg/L CNWAD target level will be reported within 7 days to the appropriate regulatory agency.		period the processing plant is still under construction; hence cyanide monitoring has not yet begun.
12	Minimise likelihood of tailings entrapment to Significant Fauna as a result of the TSF	As per TSF and cyanide management procedures (CRL-ENV-PRO-019-19), fauna monitoring at the TSF will occur twice a day to observe and record wildlife usage. One patrol will be conducted after dawn and the other in late afternoon	Identify likely cause of incident. Review TSF and cyanide management protocols in particular decant and beach management. Implement corrective measures to ensure future compliance is achieved.	Not required at this stage	As of the end of the reporting period the TSF was still under construction with discharge of tailings not expected until Q1 2022.
13	Minimise likelihood of arsenic poisoning to Significant Fauna as a result of the project.	Soluble Arsenic monitoring as per the Metalliferous Drainage Management Procedure (CRL-ENV-PRO-022-1919) Research using existing Copenhagen Pit	Identify likely cause of incident. Review Metalliferous Drainage management protocols. Implement corrective measures to ensure future compliance is achieved.	Not required at this stage Not required at this stage	Nickel arsenic zone not mined during the reporting period. Initial baseline monitoring of the arsenic levels in Ghost Bats at WGP occurred in March 2021. Appendix J. Continued monitoring of the SM4 monitor at Copenhagen pit. Appendix F.
14	Effective waste management procedures.	No significant increase to records of feral animals within	Identify likely cause of incident.	Compliant	No increase in records of feral animals within the project.

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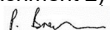
Number	Performance Objective	Targets	Management Actions	Status	Further Information
		camp and administrative facilities (due to poor waste management).	Review waste management protocols. Review/increase feral animal control program. Review the feral animal management measures within this SSMP.		
15	Successful implementation of the fire prevention and control management strategy.	No Project-related fires.	Identify likely cause of incident. Review fire prevention and control management strategy.	Compliant	No project related fires. However, a fire started close to Marble Bar and came in close proximity to Bow Bells in early November 2020. A small dip coinciding with the fire occurred in the bat call count on the 7 th and 8 th November 2020 was recorded in the SM4 monitoring data. A fire prevention and control management strategy has not yet been developed.
16	Effective weed control.	No new species of Declared weeds or WONS found within the Project area. No significant percentage increase in weed coverage over the Project area as compared to the surrounding pastoral station.	Identify likely cause of incident. Review weed monitoring and management program.	Compliant	No new declared species or WONS found within the project area.
17	Implement Feral Fauna Control Program.	No significant increase in feral fauna numbers during annual monitoring periods.	Review likely causes of increase. Review and revise management measures to stem the increase in numbers within the Project.	Compliant	No significant increase in feral species within the project area.
18	Manage the proposed Klondyke Underground at closure so that the underground tunnels are	Klondyke Underground is planned from the beginning of underground development with the endpoint of	Investigate reason why Klondyke Artificial Roost has not been factored into underground mine design and implement corrective measures to ensure mine design has occurred with	Not required at this stage	Klondyke underground not expected to begin until 2023/24

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Number	Performance Objective	Targets	Management Actions	Status	Further Information
	conducive to Pilbara Leaf-nose Bat and Ghost Bat roosting.	developing the workings at closure into an artificial roost that can be used by Pilbara Leaf-nose Bat and Ghost Bat.	the closure end point of Artificial Roost.		
		Access to Klondyke Underground is restricted so that the underground tunnels are safe for Pilbara leaf-nosed Bat and Ghost Bats to inhabit.	Investigate reason why Klondyke Underground Significant Bat Closure Strategy has not been developed and implement corrective measures to ensure Strategy is developed.	Not required at this stage	Klondyke underground not expected to begin until 2023/24
		Klondyke Underground Significant Bat Closure Strategy is developed in consultation with a suitably qualified Ecologist 12 months prior to planned completion of operations.		Not required at this stage	Klondyke underground not expected to begin until 2023/24
		Klondyke Underground Closure Bat Strategy is implemented		Not required at this stage	Klondyke underground not expected to begin until 2023/24

4.2 Supporting/Verifying Documentation

Information/documentation which supports/verifies declarations of compliance status should be provided where relevant. This information may be provided within the Details of Declared Compliance Status Section of the CAR or be referred in that section and then be provided in appendices. Wherever the details are provided, the CAR will make it clear which implementation condition and/or procedure the information is relevant to.

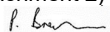
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5 Appendices

Appendix A

Table 7. Key Characteristics of proposal, Attachment 2 MS1150

Audit Code	Subject	Requirement	Status	Further Information	
1150:M1.1	Proposal implementation	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.	Compliant.	The proposal has been implemented in accordance with all elements listed in Column 4, Table 2 of Schedule 1.	
		Key Characteristic	Description		
		Clearing	Up to 398 hectares	Compliant.	129.83ha cleared during the reporting period. Figure/Appendix YY
		Groundwater abstraction	Up to 1.6 GL	Compliant.	0.08 GL abstracted during the reporting period
		Waste rock	20,000,000 LCM at Klondyke and 300,000 LCM at Copenhagen	Compliant.	11,024 LCM
Ore processing (waste)	Production throughput of 2.5Mtpa	Compliant.	Processing had not begun during the reporting period.		

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Appendix B

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1150:M1.1	Proposal implementation	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.	Implement proposal as defined in Schedule 1.	Annual Compliance Assessment Report (CAR)	Overall.	Ongoing.	Compliant.	Appendix D.
1150:M2.1	Contact Details	The proponent shall notify the CEO of any change of its name, physical address, or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Submit written notification to the CEO.	Written advice to the CEO.	Overall.	Within 28 days of such change.	Compliant.	Unchanged
1150:M3.1	Time limit for proposal implementation	The proponent shall not commence implementation of the proposal after five (5) years from the date of this Statement, and any commencement, prior to this date, must be substantial.	Commence substantial implementation of proposal by 20 August 2025	Written advice to the CEO. Audit site inspection report.	Overall.	Overall.	Compliant.	Project started 27 February 2021
1150:M3.2	Time limit for proposal implementation	Any commencement of implementation of the proposal, on or before five (5) years from the date of this Statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of five (5) years from the date of this Statement.	Provide written evidence of substantial commencement of implementation on or before 20 August 2025.	Written advice to the CEO.	Overall.	Before 20 August 2025.	Compliant.	Project started 27 February 2021
1150:M4.1	Compliance reporting	The proponent shall prepare and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation of the proposal, whichever is sooner.	Prepare a Compliance Assessment Plan and submit to the CEO for approval.	Compliance Assessment Plan (CAP). Approval of CAP by CEO.	Preconstruction.	By 20 May 2021, or prior to implementation of the proposal,	Compliant.	Approved by the CEO 8 April 2021. Appendix K.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
						whichever is sooner.		
1150:M4.2	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; 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.	Prepare and submit to the CEO a CAP addressing all requirements.	CAP. Approval of CAP by CEO.	Overall.	Annually	Compliant.	This Report
1150:M4.3	Compliance reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2, the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.	Undertake annual compliance assessments in accordance with the approved CAP.	Annual CAR.	Overall.	Ongoing, annually.	Compliant.	Appendix K.
1150:M4.4	Compliance reporting	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 4-1 and shall make those reports available when requested by the CEO.	Prepare and retain Annual CARs in accordance with the approved CAP. Make CARs available to CEO on request.	Annual CAR.	Overall.	Ongoing, as required by record keeping legislation.	Compliant	This is the first Compliance Assessment Report
1150:M4.5	Compliance reporting	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.	Written correspondence to CEO within 7 days of any potential noncompliance.	Correspondence to CEO advising of potential non-compliance, including details of the potential noncompliance, remedial and/or corrective actions undertaken and measures that were in	Overall.	Within 7 days of a potential non-compliance being known.	Compliant	Confirmation that the missing blast data was not on the backing Saros database received on 27/11/2021. Email informing

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
				place to prevent the potential non-occurrence before it occurred and amendments to those measures, if any, to prevent reoccurrence. Annual CAR.				DWER sent along with this CAR on 01/12/2021. Refer to Section 3 of the report.
1150:M4.6	Compliance reporting	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment report, or as otherwise agreed in writing by the CEO. The 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 4-1.	Submit Annual CARs addressing all requirements annually to OEPA.	Annual CAR. Transmittal documentation of CAR.	Overall.	By 20 November 2021 and annually thereafter.	Compliant	Extension of the due date was requested. Appendix L.
1150:M5.1	Public Availability of Data	Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	Make data relevant to the assessment of this proposal and implementation of this statement publicly available as per OEPA Post Assessment Guidance for Making	Transmittal documentation of request for data. Website link (if posted on a website).	Overall.	Ongoing.	Compliant.	https://www.calidus.com.au/

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
			information publicly available (OEPA 2012c).					
1150:M5.2		If any data referred to in condition 5-1 contain 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	Provide the CEO with an explanation and reasons why data should not be made publicly available.	Correspondence to the CEO of the OEPA requesting approval to not make data publicly available, if applicable	Overall.	Ongoing.	Compliant.	There is no confidential information contained within the report.
1150:M6.1	Mining Exclusion Zone	The proponent shall manage the implementation of the proposal to meet the following outcome: (1) implementation of a Mining Exclusion Zone (MEZ) as shown in Figure 2 of Schedule 1 and defined in Table 3 Abbreviations and Definitions Schedule 1 to ensure there is no surface mining activities within the MEZ as a result of the proposal.	Demonstrate that the MEZ is implemented as shown in Figure 2 of Schedule 1	Annual CAR. Site inspection records. Construction records.	Overall.	Ongoing.	Compliant.	The Clearing Permit procedure in conjunction with survey prevents disturbance within the MEZ.
1150:M7.1		Prior to ground disturbing activities, unless otherwise agreed by the CEO, the proponent shall finalise and submit a revision of the Significant Species Management Plan (CRL-ENV-PLN006-19 Rev 2, May 2020) in consultation with the agency responsible for the administration of the Biodiversity Conservation Act 2016 (being at the time of this Statement the Department of Biodiversity, Conservation and Attractions). The Significant Species Management Plan shall, when implemented, meet the following environmental objective: 1. avoid where possible, otherwise minimise direct and indirect impacts to significant fauna and their habitat, including, but not limited to: (a) Pilbara leaf-nosed bat;	Finalise and submit revision of the Significant Species Management Plan (SSMP) addressing all requirements specified in condition 7-1.	SSMP. Annual CAR.	Preconstruction.	Prior to ground disturbing activities.	Compliant.	Revised Significant Species Management Plan CRL-ENV-PLN-006-19, Rev 3.3 approved 16 September 2020. Appendix M and Appendix N.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(b) ghost bat; (c) Pilbara olive python; and (d) northern quoll.						
1150:M7.2	Significant Species Management Plan	The Significant Species Management Plan required by condition 7-1 shall: 1. specify the environmental objective to be achieved, as specified in condition 7-1; 2. specify management actions to meet the environmental objective; 3. specify management targets; 4. specify monitoring to determine if management targets are being met; 5. provide the format and timing for the reporting of monitoring results against management targets to demonstrate that condition 7-1 has been met over the reporting period in the Compliance Assessment Report required by condition 4-6; 6. specify in accordance with condition 7-5 a process for revision of management actions and changes to revised proposal activities, in the event that the management targets are not achieved. The process shall include an investigation to determine the cause of the management target(s) not being achieved	Finalise and submit revision of the Significant Species Management Plan (SSMP) addressing all requirements specified in condition 7-2.	SSMP. Annual CAR.	Preconstruction.	Prior to ground disturbing activities.	Compliant.	Revised Significant Species Management Plan CRL-ENV-PLN-006-19, Rev 3.3 approved 16 September 2020. Appendix M and Appendix N.
1150:M7.3	Significant Species Management Plan	The Significant Species Management Plan required by condition 7-1 must include provisions required by condition 7-2 to address impacts to significant fauna and their habitat including, but not limited to: 1. clearing of habitat; 2. fragmentation of habitat; 3. vehicle strike; 4. collision with fencing; 5. managing feral animals; 6. minimising light and noise impacts; 7. maintaining humidity at ambient levels suitable for Pilbara leaf-nosed bat at Bow Bells South roost; 8. managing impacts on the MEZ by excluding surface blasting and permanent infrastructure; and 9. maintaining a 70 decibel A noise limit and 10	Finalise and submit revision of the Significant Species Management Plan (SSMP) addressing all requirements specified in condition 7-3.	SSMP. Annual CAR.	Preconstruction.	Prior to ground disturbing activities.	Compliant.	Revised Significant Species Management Plan CRL-ENV-PLN-006-19, Rev 3.3 approved 16 September 2020. Appendix M and Appendix N.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		millimetres per second vibration limit at Klondyke Queen roost.						
1150:M7.4	Significant Species Management Plan	After receiving notice in writing from the CEO that the Significant Species Management Plan satisfies the requirements of conditions 7-2 and 7-3, the proponent must: 1. implement the Significant Species Management Plan, or any subsequent approved versions; and 2. continue to implement the Significant Species Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated the objectives specified in condition 7-1 have been met.	Implement SSMP.	Annual CAR. Monitoring results.	Overall.	Ongoing, until the CEO confirms that the objectives of condition 71 have been met.	Potentially Non-Compliant.	One potential non-compliance regarding over triggering of blast monitor and microphone prior to a blast. Refer to Section 3 of the report.
1150:M7.5(1)	Significant Species Management Plan	In the event that monitoring, tests, surveys or investigations indicate exceedance of management targets specified in the Significant Species Management Plan, the proponent must: (1). report the exceedance in writing to the CEO within seven (7) days of the exceedance being identified;	Submit written notification to the CEO.	Annual CAR. Records of potential non-compliance.	Overall.	Within seven (7) days of the exceedance being identified.	Compliant.	
1150:M7.5(2)	Significant Species Management Plan	(2). implement the management target contingency actions specified in the Significant Species Management Plan within twenty-four (24) hours and continue implementation on those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the management targets are being met and the implementation of the contingency actions are no longer required;	Implement contingency actions	Annual CAR. Records of potential non-compliance.	Overall.	Within 24 hrs of exceedance being identified and until the CEO has confirmed that targets are being met and actions are no longer required.	Compliant	Table 6 in main report

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1150:M7.5(3)	Significant Species Management Plan	(3) investigate to determine the cause of the management target being exceeded;	Investigate cause of target exceedance.	Annual CAR. Records of potential non-compliance.	Overall.	Immediately following an exceedance being identified.	Compliant	No targets exceeded during the reporting period
1150:M7.5(4)	Significant Species Management Plan	4) investigate to provide information for the CEO to determine potential environmental harm that occurred due to the management target being exceeded; and	Investigate potential environmental harm and report to the CEO.	Incident register. Records of potential non-compliance. Results of investigation of incident.	Overall.	Immediately following an exceedance being identified.	Compliant	
1150:M7.5(5)	Significant Species Management Plan	(5) provide a report to the CEO within twenty-one (21) days of the exceedance being reported as required by condition 7-5(1). The report must include: (a) details of contingency actions implemented; (b) the effectiveness of the contingency actions implemented, against the management target; (c) the finding of the investigations required by conditions 7-5(3) and 7-5(4); (d) measures to prevent the management target being exceeded in the future; (e) measures to prevent, control or abate the environmental harm which may have occurred; and (f) justification of the management target remaining, or being adjusted based on better understanding, demonstrating that outcomes would continue to be met	Prepare and submit to the CEO a report addressing all requirements specified in condition 7-5.	Written report, correspondence, and submission record of report to CEO.	Overall.	Within 21 days of the exceedance being reported.	Compliant	No exceedances recorded during the reporting period
1150:M7.6	Significant Species Management Plan	The proponent: 1. may review and revise the Significant Species Management Plan; or 2. must review and revise the Significant Species Management Plan as and when directed by the CEO.	Review and revise SSMP if necessary or directed to do so by the CEO.	SSMP revisions. Correspondence with CEO.	Overall.	Ongoing.	Compliant	A revision of the SSMP is required to amend the LCL/UCL requirements for Bow Bells, add the extra (6 th) adit approved for

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								backfilling (St George)
1150:M7.7	Significant Species Management Plan	The proponent must implement the latest revision of the Significant Species Management Plan required in condition 7-1 which the CEO has confirmed by notice in writing, satisfies the requirements of conditions 7-1, 7-2 and 7-3.	Implement the latest version of the SSMP.	Annual CAR.	Overall.	Ongoing.	Compliant	Appendix M and Appendix N.
1150:M8.1	Offsets	In view of the significant residual impacts and risks as a result of implementation of the proposal, the proponent shall contribute funds to the Pilbara Environmental Offsets Fund calculated pursuant to condition 8-2, subject to any reduction approved by the CEO under condition 8-10.	Contribute funds to the Pilbara Environmental Offsets Fund (PEOF) in accordance with conditions 8-1 to 8-4.	Receipts of payments. Impact Reconciliation Report.	Overall.	Biennially based on financial year.	Not required at this stage	First biannual payment due 2022
1150:M8.2	Offsets	The proponent's contribution to the Pilbara Environmental Offsets Fund shall be paid biennially, with the amount to be contributed calculated based on the clearing undertaken in each year of the biennial reporting period in accordance with the rates in condition 8-3. The first biennial reporting period shall commence from ground disturbing activities of the environmental values identified in condition 8-3.	Contribute funds to the Pilbara Environmental Offsets Fund (PEOF) in accordance with conditions 8-1 to 8-4.	Receipts of payments. Impact Reconciliation Report.	Overall.	Biennially based on financial year.	Not required at this stage	First biannual payment due 2022
1150:M8.3	Offsets	Calculated on the 2018-2019 financial year, the contribution rates are: \$1,542 (excluding GST) per hectare foraging and denning habitat for northern quoll, Pilbara olive python, bats and habitat for brush-tailed mulgara and potential habitat for night parrot and greater bilby within the Chichester IBRA subregion.	Contribute funds to the Pilbara Environmental Offsets Fund (PEOF) in accordance with conditions 8-1 to 8-4.	Receipts of payments. Impact Reconciliation Report.	Overall.	Biennially based on financial year.	Not required at this stage	First biannual payment due 2022

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1150:M8.4	Offsets	From the commencement of the 2018-2019 financial year, the rates in condition 8-3 will be adjusted annually each subsequent financial year in accordance with the percentage change in the CPI applicable to that financial year.	Contribute funds to the Pilbara Environmental Offsets Fund (PEOF) in accordance with conditions 8-1 to 8-4.	Receipts of payments. Impact Reconciliation Report.	Overall.	Biennially based on financial year.	Not required at this stage	First biannual payment due 2022
1150:M8.5	Offsets	Prior to ground disturbing activities, the proponent shall prepare and submit an Impact Reconciliation Procedure to the CEO.	Prepare and submit an Impact Reconciliation Procedure (IRP)	IRP. Correspondence with the Office of the EPA.	Preconstruction.	Prior to ground disturbing activities.	Completed	Impact Reconciliation Procedure approved 16 September 2020. Appendix O and Appendix P.
1150:M8.6	Offsets	The Impact Reconciliation Procedure required pursuant to condition 8-5 shall: 1. state that clearing calculation for the first biennial reporting period will commence from ground disturbing activities in accordance with condition 8-2 and end on the second 30 June following commencement of ground disturbing activities; 2. 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; 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 condition 8-3; and 4. indicate the timing and content of the Impact Reconciliation Reports.	in accordance with conditions 8-5 and 8-6.				Completed	Impact Reconciliation Procedure approved 16 September 2020. Appendix O and Appendix P.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1150:M8.7	Offsets	The proponent shall not commence ground disturbing activities, unless otherwise agreed by the CEO, until the CEO has confirmed in writing that the Impact Reconciliation Procedure satisfies the requirements of condition 8-6.	Gain confirmation from CEO that IRP satisfies requirements of condition 8-6 before commencing ground disturbing activities.	Approved IRP. Correspondence with CEO.	Preconstruction.	Prior to ground disturbing activities.	Compliant	IRP approved prior to ground disturbance – 16 th September 2020 Appendix O and Appendix P.
1150:M8.8	Offsets	The proponent shall submit an Impact Reconciliation Report in accordance with the Impact Reconciliation Procedure approved in condition 8-7.	Prepare and submit an Impact Reconciliation Report in accordance with condition 8-7.	Impact Reconciliation Report. Correspondence with CEO via registrar@dwer.wa.gov.au	Overall.	Biennially based on financial year.	Not required at this stage	First report due 2022
1150:M8.9	Offsets	The Impact Reconciliation Report required pursuant to condition 8-8 shall provide the location and spatial extent of the clearing undertaken during each year of each biennial reporting period.	Prepare and submit an Impact Reconciliation Report in accordance with condition 8-9.	Impact Reconciliation Report. Correspondence with CEO via registrar@dwer.wa.gov.au.	Overall.	Biennially based on financial year.	Not required at this stage	First report due 2022
1150:M8.10	Offsets	The proponent may apply in writing and seek the written approval of the CEO to reduce all or part of the contribution payable under condition 82 where: (1) a payment has been made to satisfy a condition of an approval under the Environment Protection and Biodiversity Conservation Act 1999 in relation to the proposal; (2) the payment is made for the purpose of counterbalancing impacts of the proposal on matters of national environmental significance; and (3) the payment is made for the purpose of counterbalancing the significant residual impacts to the environmental value identified in condition 8-3.	If desired, apply to the CEO for reduction of payable contributions in accordance with condition 8-10.	Correspondence with CEO via registrar@dwer.wa.gov.au. Receipts of payments.	Overall.	Ongoing.	Not required at this stage	First report due 2022

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