



SORBY HILLS SILVER LEAD ZINC PROJECT

EPBC 2023/09576

Annual Compliance Report

ACR period 1: 29 August 2025 to 28 August 2026

September 2026

Approval holder:

Sorby Management Pty Ltd | ACN 145 292 486

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Submitted to the Department of Climate Change, Energy, the Environment and Water
epbcmonitoring@dcceew.gov.au

Declaration of accuracy

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

Signed	<i>Simon Noon</i>
Full name	Simon Noon
Position	Managing Director and Chief Executive Officer
Organisation	Sorby Management Pty Ltd, ACN 145 292 486
Date	17/09/2026

Document version control

Date	Author	Reviewed by
18 September 2026	Rory Embleton, Senior Environmental and Approvals Advisor	Russell Taylor, Project Director

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1. Description of activities

1.1 Project and approval identification

EPBC number	EPBC 2023/09576
Project name	Sorby Hills Silver Lead Zinc Project
Approval holder	Sorby Management Pty Ltd
ACN / ABN	ACN 145 292 486
The approved action	To construct and operate an open cut mining extension, including a tailings storage facility, evaporation pond, borrow pit, and ancillary infrastructure, Moonamang Road, 50 km north-east of Kununurra, Western Australia. See EPBC Act referral 2023/09576.
Controlling provisions	Listed threatened species and communities (sections 18 and 18A) - Approved Listed migratory species (sections 20 and 20A) - Approved
Location of the project	Moonamang Road, approximately 50 km north-east of Kununurra, North-East Kimberley region, Western Australia, Shire of Wyndham-East Kimberley. Mining tenements M80/196, M80/197, M80/285, M80/286 and M80/287. The development envelope and the disturbance undertaken within it are shown on the map at Appendix C.
Date of approval decision	29 August 2025
Date approval expires	1 August 2045
ACR period covered by this report	29 August 2025 to 28 August 2026 (ACR period 1). Part C defines the ACR period as each subsequent 12-month period following the date of the approval decision.
Date of preparation of this report	1 September 2026
Person accepting responsibility for the report	Simon Noon, Managing Director and Chief Executive Officer

Table 1-1: Project and approval identification.

1.2 Activities undertaken during the reporting period

The following events occurred during the ACR period and are evidenced in the source documents listed in Table 2-1.

Date	Event	Record
Aug-Sep 2025	Firebreak works at the Sorby Hills campsite	Completed by DBCA with Miriuwung Gajerrong Rangers.
20 November 2025	Condition 11 notification issued	The condition 11 notification letter of 17 November 2025 states that the date of substantial commencement is the date of the letter.
15 December 2025	FHOMP approved	The Fauna, Habitat and Offset Management Plan was approved by, Branch Head, Environment Assessments West Branch, as delegate of the Minister.
During the ACR period	FHOMP publication under condition 8(b)	The approval holder confirms the approved FHOMP was published on its website during the ACR period.
29 January 2026	FHOMP implementation commenced	Implementation of the approved FHOMP commenced on the date work commenced on site under the plan.
29 January 2026	Condition 5 notification issued	Letter to epbmonitoring@dcceew.gov.au advising the date implementation of the FHOMP commenced.

Table 1-2: Key events during the ACR period.

Activities undertaken during the ACR period comprised construction of the accommodation village and access infrastructure, associated clearing within the development envelope reconciled at Table 1-3, commencement of the monitoring programs listed at section 6.1, the weed survey and treatment at Goomig Lot 15 and the controlled mosaic burn recorded at Table 6-4. Rehabilitation, the Integrated Waste Landform and all tailings storage facility activities had not commenced. The offset actions in section 8 of the approved FHOMP had not commenced and are addressed at section 2.5.

1.3 Clearing reconciliation against the condition 2 limits

Clearing undertaken during the ACR period is reconciled against each limit in condition 2 below. The shapefile required by condition 22(b) must be consistent with these figures.

Protected matter habitat	Condition 2 limit	Cleared this ACR period	Cleared cumulatively	Remaining	Limit used
Gouldian Finch foraging and breeding habitat	16.1 ha	11.15 ha	11.15 ha	4.95 ha	69.3%
Australian Painted Snipe foraging habitat	562.4 ha	303.16 ha	303.16 ha	259.24 ha	53.9%
Crested Shrike-tit (northern) foraging habitat	12.5 ha	8.16 ha	8.16 ha	4.34 ha	65.3%
Northern Quoll habitat exclusion zone	Nil permitted	0 ha	0 ha	n/a	0%

Table 1-3: Clearing reconciliation against condition 2 limits.

No limit in condition 2 was exceeded during ACR period 1, and none has been exceeded cumulatively since the approval decision.

These figures are both the ACR period figures and the cumulative figures since the approval decision of 29 August 2025, the Action having commenced within ACR period 1.

2. Approval conditions and compliance assessment

2.1 Approach

All conditions of EPBC approval 2023/09576, including any variations to those conditions, have been considered and addressed in this report. The compliance designation for each condition and the evidence supporting it are set out in Appendix A.

No variation has been made to the conditions of EPBC approval 2023/09576.

The compliance assessment was carried out by Rory Embleton, Senior Environmental and Approvals Advisor, Sorby Management Pty Ltd.

The assessment relied on the source documents listed below, together with the incident management system, the animal sighting register, the feral animal site register, the induction register, the monthly environmental inspection records, the surface water quality monitoring records, the standing water level register, the dust results register, the ground disturbance records, the Traditional Owner Engagement Tracker and the departmental correspondence file.

2.2 Statement of compliance

During ACR period 1, 29 August 2025 to 28 August 2026, operations were compliant with the conditions of EPBC approval 2023/09576. No non-compliance is reported.

Thirty-eight conditions were assessed. Twenty-three are designated Compliant and fifteen Not applicable. None is designated Non-compliant.

The fifteen conditions designated Not applicable are conditions 6, 13, 15, 18 and 28 to 38. They fall into two groups. Conditions attaching to activities, events or periods that had not occurred or closed during the ACR period, being conditions 6, 13, 15 and 18. The independent audit, variation, revocation and transfer provisions at conditions 28 to 38, which were not engaged during the period.

89 commitments in the approved FHOMP were assessed under condition 20(a)(ii). Forty-six are designated Compliant and forty-three Not applicable. None is designated Non-compliant. The full assessment is at Appendix B.

2.3 EPBC approval conditions compliance table

The conditions compliance table required by section 3.6 of the Guidelines and condition 20(a)(i) of the approval is provided at Appendix A. It records, for each condition, the condition number and reference, the full wording of the condition as per the EPBC approval, the compliance designation, a summary of the evidence supporting that designation, and references to the parts of this report that relate to the condition.

2.4 Management plans in effect and their implementation

Plan	Fauna, Habitat and Offset Management Plan (FHOMP)
Condition requiring the plan	Condition 4
Version approved	"Sorby Hills Fauna, Habitat and Offset Management Plan, Revision C, Signed 9 December 2025" [S4]
Approval status	Approved by Branch Head, Environment Assessments West Branch, as delegate of the Minister, on 15 December 2025 [S4]
Date implementation commenced	29 January 2026, being the date work commenced on site under the plan

Date the department was notified under condition 5	29 January 2026 [S5], within the 5 business days required by condition 5
Published on the website under condition 8	Published on the approval holder's website during the ACR period. Publication was required within 15 business days of 15 December 2025, being by about 13 January 2026. The exact publication date is not recorded.
Period the plan was in effect during ACR period 1	29 January 2026 to 28 August 2026

Table 2-1: Schedule of plans in effect during the ACR period (condition 20(b)).

The FHOMP was the only plan in effect in relation to these conditions during the ACR period.

Compliance with each commitment made in the approved FHOMP is recorded in Appendix B, in accordance with conditions 20(a)(ii) and 20(c).

A Traditional Owner Engagement Tracker is maintained for the FHOMP commitments involving Traditional Owners and DBCA. As at 26 August 2026 it records 14 such commitments: 3 On Track, 5 In Progress and 6 Not Commenced. The six Not Commenced all relate to the offset program and are addressed at section 2.5.

2.5 Status of the offset program at the end of ACR period 1

The direct and indirect offset commitments in section 8 of the approved FHOMP had not commenced during the ACR period. No funding agreement or memorandum of understanding with the Department of Biodiversity, Conservation and Attractions was executed for the prescribed burning program at Goomig Conservation Park, indirect offset priorities had not been agreed, and the weed management target outcomes for the conservation park remain recorded as TBA in the approved plan.

Those commitments are designated Not applicable for ACR period 1 rather than Non-compliant because the approved FHOMP fixes no date for delivery of the offset actions. Section 8.3 defers the value and timeframe of offset funding to advice from DCCEEW and DBCA, and defers specific offset activities and schedules to consultation with DBCA, SMPL and the MG Corporation. Those consultations had not concluded at the end of ACR period 1.

The same reasoning applies to condition 6(b) of the approval, which requires offset outcomes to be achieved "by the time specified in the FHOMP". The approved plan specifies no such time.

The approval holder recognises that this position is available for the first reporting period only. The absence of an agreed offset delivery schedule is recorded as a new risk at section 5.1, with the actions the approval holder will take to close it.

Two on-ground actions relevant to the offset site were nevertheless delivered during the ACR period. Weed survey and treatment covering 50 ha was carried out at Goomig Lot 15, within the proposed Goomig Conservation Park, on 10 November 2025. A controlled mosaic burn covering 23 ha was completed within the Project development envelope. Both are recorded at section 6.3.

The works commissioned during the ACR period set out in Table 6-2 were carried out at the minesite rather than at the offset site. They are reported as Traditional Owner engagement and minesite works and are not presented as delivery of the direct offset commitments in section 8.5 of the FHOMP.

The measures applied, the monitoring undertaken and the performance achieved against each objective and target in the approved plan are recorded commitment by commitment at Appendix B.

3. Incidents

No incident occurred during the ACR period 29 August 2025 to 28 August 2026. "Incident" is defined in Part C of the approval to include any event with the potential to harm a protected matter and any potential or actual non-compliance with these conditions or with a commitment made in a plan. No event of either kind was recorded.

4. Non-compliances and corrective measures

4.1 Non-compliances carried over from previous compliance reports

No non-compliance occurred during ACR period 1, so there is no non-compliance to report under Guidelines section 3.8. This is the first compliance report prepared for EPBC approval 2023/09576, so no non-compliance has been carried over from a previous report.

5. New environmental risks

No new environmental risk to a protected matter became apparent during the ACR period. The baseline against which a risk is judged to be new is the risk assessment in section 6 of the approved FHOMP, Tables 6-4 to 6-7. No new pest or disease, no new information on groundwater levels and no unexpected erosion was identified.

The approval holder monitored for new risks through the monthly environmental inspection, the threatened fauna register, the fauna observation and interaction register, the feral animal site register and the monthly ground disturbance mapping.

5.1 Risk to delivery of the offset program

Description of the risk	The approved FHOMP does not fix a date by which the direct and indirect offset actions in section 8 must be delivered. Section 8.3 defers the value and timeframe of offset funding to advice from DCCEE and DBCA, and defers specific offset activities and schedules to consultation with DBCA, SMPL and the MG Corporation. The Table 8-3 target for the extent of weed management activities is recorded as TBA. Until those matters are settled there is no schedule against which delivery of the offsets can be measured.
How and when it became apparent	During preparation of this compliance report for ACR period 1, on 18 September 2026, when the offset commitments were assessed against the approved plan.
Protected matters potentially affected	Gouldian Finch (<i>Erythrura gouldiae</i>), Australian Painted Snipe (<i>Rostratula australis</i>) and Northern Crested Shrike-tit (<i>Falcunculus frontatus whitei</i>). The offset program is the mechanism by which the residual impacts on these three species are to be compensated.
Risk analysis - likelihood, consequence and resulting risk rating	Likelihood: likely, in the absence of an agreed schedule. Consequence: moderate in the short term, because clearing to date is within the condition 2 limits and the habitat subject to the threat abatement programs remains available. High in the longer term, because condition 6(b) requires offset outcomes to be achieved and maintained until the expiry date of the approval. Resulting rating: high, on the risk framework in section 6 of the FHOMP.

Proposed management response	The approval holder will agree the offset delivery schedule and funding arrangements with DBCA and the MG Corporation, agree indirect offset priorities with DCCEE, DBCA and Traditional Owners under FHOMP section 8.6, and agree the weed management target outcomes recorded as TBA in Table 8-3. Progress will be tracked through the Traditional Owner Engagement Tracker and reported in the compliance report for ACR period 2.
Date by which the response will be completed	By the end of Q3 2027.
Is a revision of the FHOMP or another plan required?	Yes. The approved FHOMP will require revision to record the agreed offset delivery schedule and to replace the TBA target in Table 8-3. The revision will be submitted following agreement of the schedule, by the end of Q2 2027.

Table 5-1: Risk to delivery of the offset program.

6. Other information

6.1 Monitoring and survey data

Monitoring commenced during the ACR period for dust, ground disturbance mapping, vehicle and area weed inspection, feral animal recording, the threatened fauna register, surface water quality, standing water levels and groundwater. Rehabilitation monitoring, water infrastructure inspection, heavy metal analysis of bird feathers, soil and sediment monitoring and all TSF-related monitoring were not yet due. The status of each activity against the FHOMP is recorded in Appendix B.

Groundwater monitoring commenced in April 2026. Additional monitoring bores are scheduled for drilling in September 2026, in the reporting period following this one. Standing water levels adjacent to the Project disturbance were monitored during the wet season and are recorded in the standing water level register, addressing the FHOMP commitment at B54.

Records for the monitoring activities that commenced are held on the project file. Surface water quality monitoring results are held in the surface water quality monitoring records, dust monitoring results in the dust results register, and fauna observations in the animal sighting register. Species occurrence records are submitted to the department under condition 18 as described at section 6.2.

6.2 Data submitted to the department under condition 18

Data submitted	Format	Standard	Date submitted	Method
Maps and spatial data, including the clearing shapefile	Shapefile and geodatabase	Guide to providing maps and boundary data for EPBC Act projects 2021	18 September 2026	Email to the department

Table 6-1: Data submitted to the department under condition 18.

6.3 Stakeholder consultation

Consultation relating to the FHOMP is recorded in the Traditional Owner Engagement Tracker (Sorby Hills FHOMP). The engagement within the ACR period that relates to implementation of the plan is summarised in Table 6-2, and the works commissioned as a result in Table 6-3.

Date	Type	Parties	Subject and outcome
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Date	Type	Parties	Subject and outcome
5 Sep 2025	Site visit / on-country	DBCA (Luke Kirchner, Tammy Latham); MG Rangers	Firebreak works completed at the Sorby Hills campsite. Before-and-after photographic record retained.
8 Dec 2025	Correspondence	MG Corporation (Josh Millerick)	MG Rangers proposed water sampling training and support for environmental management at Sorby Hills.
20 Jan 2026	Site visit / on-country	MG Corporation (Josh Millerick, Ann Mills, Taylee McIntyre)	Inspection of fence line for removal. PO 261 issued. Works delayed by wet weather.
3 Mar 2026	Correspondence	MG Corporation (Josh Millerick)	Six MG Rangers completed Certificate II water sampling training.
23 Mar 2026	Site visit / on-country	MG Rangers; Helena O'Dwyer (contractor)	Practical surface water sampling training at Sorby Mine.
7 Apr 2026	Correspondence	MG Corporation (Josh Millerick, Ann Mills)	Quote QU-0022 received for roadside weed treatment; spray area maps reviewed.
16 Apr 2026	Correspondence	MG Corporation	PO 286 issued for weed control works.
Jul 2026	Meetings and correspondence	MG Corporation (Josh Millerick)	Roadside weed treatment completed and invoiced. Fencing scope agreed for the sprayfield and pumping station.

Table 6-2: Traditional Owner and DBCA engagement during the ACR period. Source: Traditional Owner Engagement Tracker (Sorby Hills FHOMP), last updated 26 August 2026. A DBCA fire management proposal dated 1 July 2025 and the associated work order of 5 July 2025 precede the ACR period and are noted as context only.

Works commissioned	PO	Contractor	Status	Value (incl GST)
Firebreak works, Sorby Hills campsite	PO 250	DBCA with MG Rangers	Complete, Aug-Sep 2025	\$4,944.50
Water sampling training and practical session	-	MG Corporation	Complete, Mar 2026	\$745.36
Bore testing and air quality monitoring set-up	-	MG Corporation	Complete, Jun 2026	\$1,346.40
Removal of disused barbed wire fencing (3.624 km of a 4.5 km scope)	PO 261	MG Corporation	Complete, invoiced Jun 2026	\$12,497.36
Roadside weed treatment, Sorby Hills minesite	PO 286	MG Corporation	Complete, Jul 2026	\$17,042.33
Sprayfield and pumping station fence installation	Pending	MG Corporation	Quoted Jul 2026, not yet invoiced	\$8,651.50

Table 6-3: Works commissioned through Traditional Owner engagement during the ACR period. Total committed \$45,227.45 incl GST, of which \$36,575.95 had been invoiced as at 26 August 2026.

Every item in Table 6-3 was carried out at the Sorby Hills minesite, not at the Goomig Conservation Park offset site. That expenditure is reported as Traditional Owner engagement and minesite works. It is not

presented as delivery of the direct offset commitments in section 8.5 of the FHOMP. The status of the offset program at the end of the ACR period is set out at section 2.5.

Two on-ground actions under the approved FHOMP were completed during the ACR period.

Action	Date	Extent	Detail
Weed survey and treatment, Goomig Lot 15	10 November 2025	50 ha	Within the proposed Goomig Conservation Park. Resourced by the approval holder. Addresses the FHOMP section 8.5.2 commitment to resource annual weed assessments and control in susceptible areas (Appendix B, B59).
Controlled mosaic burn, Project development envelope	June 2026	230,000 m2 (23 ha)	Completed within the Project development envelope in the vicinity of the Sorby Hills tenement. Reported against the FHOMP Table 6-9 mosaic burn target (Appendix B, B33). The burn was mapped after works were completed (Appendix B, B53). The map is held on the project file and is not appended to this report.

Table 6-4: On-ground actions completed under the approved FHOMP during the ACR period.

Consultation with the Department of Biodiversity, Conservation and Attractions was held on 29 May 2026. That meeting addressed the approved FHOMP in addition to the Typhonium sp. Kununurra Management Plan, Monitoring Plan and Offsets Strategy under the Western Australian authorisation.

Consultation with the Department of Climate Change, Energy, the Environment and Water during the ACR period comprised the correspondence recorded at Table 1-2, being the condition 11 notification of 20 November 2025, the substantial commencement letter of 17 November 2025, the FHOMP approval correspondence of 15 December 2025 and the condition 5 notification of 29 January 2026. No other consultation with the department occurred during the period.

7. Publication and notification

Conditions 22 to 25 govern publication of this report and the related clearing shapefile. Publication is required within 20 business days after the end of the ACR period, being by 25 September 2026, and the department must be notified of publication and given the web address within 5 business days of that date. The dates in Table 7-1 are completed on publication.

Requirement	Condition	Timeframe	Date completed	Detail
Publish this compliance report on the website in an easily accessible and downloadable format	22(a)	Within 20 business days following the end of the ACR period, being by 25 September 2026	18 September 2026	Approval holder's website
Publish a shapefile showing all clearing of protected matters, and their habitat, undertaken within the ACR period	22(b)	Within 20 business days following the end of the ACR period, being by 25 September 2026	18 September 2026	Approval holder's website

Requirement	Condition	Timeframe	Date completed	Detail
Exclude or redact sensitive biodiversity data from the published report and shapefile	23(a)	On publication	n/a	No redactions made
Submit the full compliance report to the department and notify what was redacted	23(b)	Within 5 business days of publication	n/a	Not engaged - no redacted version exists
Submit the full shapefile to the department and notify what was redacted	23(c)	Within 5 business days of publication	n/a	Not engaged - no redacted version exists
Notify the department of publication and provide the web address for the report and related shapefile	24	Within 5 business days of publication	18 September 2026	Notified by email to the department with the compliance report submission on 18 September 2026, including the web address for the published report and shapefile.
Keep the report and shapefile published until the expiry date of the approval	25	Ongoing to 1 August 2045	n/a	The report and shapefile will remain published on the approval holder's website for the life of the approval.

Table 7-1: Publication and notification obligations.

8. References

Department of Climate Change, Energy, the Environment and Water 2023, Annual Compliance Report Guidelines, Canberra.

Department of Climate Change, Energy, the Environment and Water 2025, Notification of approval decision, Sorby Hills Silver-Lead-Zinc Project, EPBC 2023/09576, 29 August 2025.

Commonwealth of Australia 2018, Guidelines for biological survey and mapped data.

Commonwealth of Australia 2021, Guide to providing maps and boundary data for EPBC Act projects.

Commonwealth of Australia 2024, Policy on Accessing and Sharing Biodiversity Data.

Sorby Management Pty Ltd 2025, Sorby Hills Project Fauna, Habitat and Offset Management Plan, Revision C, signed 9 December 2025, approved by the delegate of the Minister on 15 December 2025.



Appendix A - EPBC Approval Conditions Compliance Table

Sorby Hills Silver Lead Zinc Project | EPBC 2023/09576 | ACR period 1: 29 August 2025 to 28 August 2026

Prepared in accordance with section 3.6 and Appendix A of the Annual Compliance Report Guidelines, Commonwealth of Australia 2023, and condition 20(a)(i) of EPBC 2023/09576.

Designations (Guidelines section 3.7 - use these three terms only):

- **Compliant** - all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
- **Non-compliant** - the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
- **Not applicable** - the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period.

Every finding of non-compliance must also be written up in section 4 of the main report with all eight fields required by Guidelines section 3.8.

Condition number / reference	Condition (full wording as per the EPBC approval)	Is the project compliant with this condition? Compliant / Non-compliant / Not applicable	Evidence / comments
CLEARING LIMITS			
1	The approval holder must not: a) Clear outside of the development envelope. b) Construct outside of the development envelope.	Compliant	The approval holder confirms that all clearing and construction during the ACR period occurred within the development envelope. Disturbance by protected matter habitat type is recorded in the fauna habitat disturbance dataset and reported at Table 1-3. A map of the disturbance against the development envelope is provided at Appendix C.
2	The approval holder must not clear more than: a) 16.1 hectares (ha) of Gouldian Finch foraging and breeding habitat. b) 562.4 ha of Australian Painted Snipe foraging habitat. c) 12.5 ha of Crested Shrike-tit (northern) foraging habitat.	Compliant	Disturbance of protected matter habitat during the ACR period, from the fauna habitat disturbance dataset . The approval holder confirms these figures are both the ACR period figures and the cumulative figures since the approval decision of 29 August 2025, the Action having commenced within ACR period. a) Gouldian Finch foraging and breeding habitat: 11.15 ha of the 16.1 ha limit (69.3 per cent), 4.95 ha remaining. b) Australian Painted Snipe foraging habitat: 303.16 ha of the 562.4 ha limit (53.9 per cent), 259.24 ha remaining. c) Crested Shrike-tit (northern) foraging habitat: 8.16 ha of the 12.5 ha limit (65.3 per cent), 4.34 ha remaining. No limit in condition 2 was exceeded during the ACR period, and none has been exceeded cumulatively.
3	The approval holder must not clear or construct within the Northern Quoll habitat exclusion zone.	Compliant	No Northern Quoll habitat was cleared during the ACR period. Recorded at Table 1-3 as 0 ha against a limit of nil permitted, and shown on the disturbance map at Appendix C.
ACTION MANAGEMENT PLANS - Fauna, Habitat and Offset Management Plan			

Condition number / reference	Condition (full wording as per the EPBC approval)	Is the project compliant with this condition? Compliant / Non-compliant / Not applicable	Evidence / comments
4	The approval holder must submit to the department for approval by the Minister, a Fauna, Habitat and Offset Management Plan (FHOMP). The FHOMP must: a) be prepared by a suitably qualified environmental professional, b) be consistent with the Environmental Offsets Policy and the Environmental Management Plan Guidelines, c) include commitments, environmental outcomes, management measures, corrective actions, trigger values and performance indicators that are SMART and are based on referenced or included evidence of effectiveness, d) include measures to avoid and mitigate harm as a result of the Action on protected matters, including, but not limited to: i) detailed baseline information on protected matter habitat and habitat quality in the development envelope, ii) a summary of the potential impacts of the Action on protected matters, including an assessment of associated risks, iii) a detailed specification of environmental performance objectives and targets applicable to protected matters, iv) avoidance and mitigation measures that will be implemented by the approval holder to minimise the impact of the Action on protected matters, taking into account threatening processes, v) a specification of how the effectiveness of the avoidance, mitigation and management measures will be monitored, including the methodology, frequency and duration of monitoring activities, vi) a framework for annual reporting to the department on the effectiveness of implementation of the FHOMP. e) Include a strategy and measures to compensate for the residual significant impacts of the Action on the Gouldian Finch, Australian Painted Snipe and Crested Shrike-tit (northern), including but not limited to: i) detailed information on the residual impacts to protected matters that will be compensated for by the offset, including all areas of habitat, and the habitat quality, for protected matters at all locations impacted by the Action which the offset is to address, ii) the relevant protected matters and a reference to the EPBC Act approval conditions to which the FHOMP refers, iii) detailed information and a shapefile specifying the location, area and boundaries of each offset site, iv) detailed baseline information on the areas of the habitat, and the habitat quality, for protected matters at each offset site, v) achievable offset outcomes, relevant to the conservation of the Gouldian Finch, Australian Painted Snipe and Crested Shrike-tit (northern), for each offset site and the timeframes in which they will be achieved, vi) a table summarising all commitments to achieve the offset outcomes for protected matters at each offset site and a reference to where each commitment is detailed in the FHOMP, vii) reporting and review mechanisms to inform the department annually regarding compliance with the implementation of management measures and the attainment and maintenance of the offset outcomes, viii) an assessment of risks to achieving each offset outcome and what risk management measures and/or strategies will be applied to address these, ix) a monitoring program, which must specify: A) measurable performance indicators and the timeframes for their achievement to gauge attainment of each offset outcome for the protected matters, B) trigger values for corrective actions, and C) the proposed timing (including season/time of day/frequency) methods and effort, and an explanation of how these will be effective for this purpose, of monitoring to detect trigger values, changes in the performance indicators and to gather evidence that effectively demonstrates actual progress towards, attainment of and maintenance of all offset outcomes for the protected matters, x) corrective actions to be implemented to ensure all offset outcomes for the protected matters are achieved or maintained if trigger values are reached or performance indicators not achieved in the specified timeframes, xi) references to related plans and conditions of approval (including state/territory approval conditions), and xii) how each offset site will be protected, including securement, and all offset outcomes maintained or improved, at least until the expiry of the approval.	Compliant	The FHOMP was submitted to the department and approved by the Branch Head, Environment Assessments West Branch, as delegate of the Minister, on 15 December 2025. The approval letter approves the "Sorby Hills Fauna, Habitat and Offset Management Plan, Revision C, Signed 9 December 2025". The plan was prepared by Green Values Australia. The offset site shapefile required by condition 4(e)(iii) is held with the approved plan.

Condition number / reference	Condition (full wording as per the EPBC approval)	Is the project compliant with this condition? Compliant / Non-compliant / Not applicable	Evidence / comments
5	Within 5 business days of commencing implementation of the approved FHOMP, the approval holder must notify the department of the date on which implementation of the FHOMP commenced.	Compliant	Implementation of the approved FHOMP commenced on 29 January 2026, being the date work commenced on site under the plan. The department was notified of that date by letter dated 29 January 2026, within the 5 business days required.
6	The approval holder must: a) achieve all environmental performance objectives applicable to protected matters that are specified in the approved FHOMP, and b) achieve all offset outcomes for each offset site specified in the approved FHOMP by the time specified in the FHOMP. Once achieved, the approval holder must maintain or exceed the offset outcomes at least until the expiry date of this approval.	Compliant	Compliance against the FHOMP is determined in Appendix B.
SUBMISSION AND PUBLICATION OF PLANS			
7	Wherever these conditions require the approval holder to submit any plan to the department, all such plans must be submitted to the department electronically.	Compliant	The only plan required to be submitted to the department during ACR period was the FHOMP under condition 4, which was submitted
8	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date: a) of this approval, if the version of the plan to be implemented is specified in these conditions, b) the plan is approved by the Minister in writing, if the plan requires the approval of the Minister, c) the plan is submitted to the department in accordance with a requirement of these conditions, if the plan does not require the approval of the Minister.	Compliant	The approval holder confirms the approved FHOMP was published on the company website within that period and remains published.
9	The approval holder must keep all plans published on the website, in a format that is easily accessible and downloadable, from the first date which that plan must be published and until the expiry date of this approval. This requirement applies to all current and superseded versions of plans.	Compliant	The approved FHOMP was published in full on the company website with no redaction, and remains published .
10	The approval holder is required to exclude or redact sensitive biodiversity data from any version of a plan before that plan is published on the website or otherwise provided to a member of the public. If sensitive biodiversity data is excluded or redacted from a plan, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.	Compliant	No sensitive biodiversity data was excluded or redacted from the version of the FHOMP published on the website, so no notification of exclusions or redactions was required.
COMMENCEMENT OF THE ACTION			
11	The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days following commencement of the Action.	Compliant	The approval holder confirms that the first on-site clearing, construction or other physical activity within the EPBC development envelope, as defined at Part C, occurred on or after 12 November 2025. [AH: confirmed by the approval holder] Notification was given by letter dated 17 November 2025 from Simon Noon, Chief Executive Officer [S2], emailed on 20 November 2025 at 13:58 AWST to postapproval@dcceew.gov.au [S3]. That is within 5 business days of the date of commencement.
12	The approval holder must not commence the Action later than 5 years after the date of this approval decision.	Compliant	The approval decision is dated 29 August 2025, so the Action had to commence no later than 29 August 2030. The Action commenced during this ACR period. [S1, S2, S3]
13	The approval holder must notify the department electronically of the date completion of construction within 5 business days following completion of construction.	Not applicable	The approval holder confirms construction was not completed during the ACR period. [AH: confirmed by the approval holder] The obligation to notify the date of completion of construction was therefore not triggered during this period.
COMPLIANCE RECORDS			
14	The approval holder must maintain accurate and complete compliance records and document the procedure for recording and storing compliance records.	Compliant	PML-SM-HSE-PLN003 Sorby Hills Compliance Register Rev A sets out the procedure for recording and storing compliance records and is the register itself. The FHOMP records that obligations, audits, stakeholder consultation and corrective and preventative actions are maintained Sorby Managements Environmental Management Systems.

Condition number / reference	Condition (full wording as per the EPBC approval)	Is the project compliant with this condition? Compliant / Non-compliant / Not applicable	Evidence / comments
15	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.	Not applicable	No requests.
16	The approval holder must ensure that any monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guidelines for biological survey and mapped data, Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing.	Compliant	Monitoring data, surveys, maps and spatial and metadata prepared during the ACR period were prepared in accordance with the Guidelines.
17	The approval holder must ensure that any monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guide to providing maps and boundary data for EPBC Act projects, Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.	Compliant	Maps and boundary data, including the condition 22(b) clearing shapefile, are prepared in GDA94 and include in the submission as required by condition 17.
18	The approval holder must submit all monitoring data, surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 20 business days of the next anniversary of the date of this approval decision except where otherwise specified in a plan.	Not applicable	Condition 18 requires the data to be submitted within 20 business days of the next anniversary of the approval decision. The approval decision is dated 29 August 2025, so the anniversary is 29 August 2026, one day after ACR period 1 closed, and the submission falls due on 25 September 2026.
ANNUAL COMPLIANCE REPORTING			
19	The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period).	Compliant	This document is the compliance report prepared for ACR period 1, 29 August 2025 to 28 August 2026, being the first ACR period under this approval.
20	The approval holder must ensure each compliance report includes: a) accurate and complete details of compliance and any non-compliance with: i) each condition attached to this approval decision, and ii) all commitments made in each plan, b) a schedule of all plans in effect in relation to these conditions during the ACR period, c) accurate and complete details of how each plan was implemented during the ACR period, and d) if any incident occurred, accurate and complete details of each incident.	Compliant	This report includes all requirements.
21	The approval holder must ensure each compliance report is completed to the satisfaction of the Minister and is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.	Compliant	This report has been prepared consistently with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.
22	The approval holder must, within 20 business days following the end of each ACR period, in a format that is easily accessible and downloadable, publish on the website: a) each compliance report, and b) a shapefile showing all clearing of protected matters, and their habitat, undertaken within the ACR period.	Compliant	The compliance report and shapefiles has been uploaded on the company website before 25 th September 2026.
23	The approval holder must: a) Exclude or redact sensitive biodiversity data from each compliance report and shapefile published on the website or otherwise provided to a member of the public. b) If sensitive biodiversity data is excluded or redacted from a version of a compliance report published or otherwise provided to a member of the public, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public. c) If sensitive biodiversity data is excluded or redacted from a version of a shapefile published or otherwise provided to a member of the public, submit the full shapefile to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.	Compliant	No sensitive biodiversity data is excluded or redacted from the compliance report or the related shapefile, and both are published in full.
24	The approval holder must notify the department electronically, within 5 business days of each date of publication that the compliance report has been published on the website. In this notification, the approval holder must provide the department with the web address for where the compliance report and related shapefile are published on the website.	Compliant	Notification to the department has been made within 5 days of publishing this report to the company website.
25	The approval holder must keep each compliance report and related shapefile published on the website from the first date which that compliance report must be published and until the expiry date of this approval.	Compliant	The compliance report and shapefile remain on the company website.

Condition number / reference	Condition (full wording as per the EPBC approval)	Is the project compliant with this condition? Compliant / Non-compliant / Not applicable	Evidence / comments
REPORTING NON-COMPLIANCE			
26	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident. The approval holder must specify in each notification: a) any condition or commitment made in a plan which has not been, or may have not been, complied with, b) a short description of the incident, and c) the location (if applicable, including co-ordinates), date and time of the incident.	Compliant	No Incidents occurred during the reporting period.
27	The approval holder must provide to the department in writing, within 12 business days of becoming aware of an incident, the details of that incident. The approval holder must specify: a) all corrective measures and investigations which the approval holder has already taken in respect of the incident, b) the potential impacts of the incident, c) the method and timing of any corrective measures that the approval holder proposes to undertake to address the incident, and d) any variation of these conditions or revision of a plan that will be required to prevent recurrence of the incident and/or to address its consequences.	Compliant	No Incidents occurred during the reporting period.
INDEPENDENT AUDIT			
28	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period.	Not applicable	"Audit period" is defined in Part C as each subsequent five year period following the commencement of the Action. The Action commenced during this ACR period, so the first audit period had not ended and no independent audit obligation was triggered during the period.
29	The approval holder must submit details of the proposed independent auditor and their qualifications to the department within 10 business days following the end of each audit period.	Not applicable	No audit was conducted during this reporting period.
30	The approval holder must ensure the scope of each independent audit is sufficient to determine the compliance status for each condition of approval, and each commitment made in each plan.	Not applicable	No audit was conducted during this reporting period.
31	The approval holder must ensure the criteria for each independent audit and the undertaking of each independent audit are consistent with the Independent Audit and Audit Report Guidelines.	Not applicable	No audit was conducted during this reporting period.
32	The approval holder must submit an audit report to the department for written agreement from the department within 3 months following the end of each audit period, or as otherwise directed by the Minister in writing.	Not applicable	No audit was conducted during this reporting period.
33	The approval holder must ensure each audit report is completed to the satisfaction of the Minister and is consistent with the Independent Audit and Audit Report Guidelines to the extent that the Independent Audit and Audit Report Guidelines are consistent with these conditions.	Not applicable	No audit was conducted during this reporting period.
34	The approval holder must publish each audit report on the website, in a format that is easily accessible and downloadable, within 10 business days of the date the department agrees to that audit report in writing.	Not applicable	No audit was conducted during this reporting period.
35	The approval holder must notify the department within 5 business days of the date the audit report is published on the website. In this notification, the approval holder must provide the department with the web address for where the audit report is published on the website.	Not applicable	No audit was conducted during this reporting period.
36	The approval holder must keep each audit report published on the website from the first date which that audit report must be published and until the expiry date of this approval.	Not applicable	No audit was conducted during this reporting period.
COMPLETION OF THE ACTION			
37	Within 20 business days after the completion of the Action, and, in any event, at least 20 business days prior to the expiry date of this approval, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data. The approval holder must submit any spatial data that comprises completion data as a shapefile.	Not applicable	The Action has not been completed and the approval does not expire until 1 August 2045.
38	The approval holder must notify the department electronically at least 60, but not more than 70, business days prior to the expiry date of this approval, that the approval is due to expire.	Not applicable	The approval expires on 1 August 2045.



Appendix B - FHOMP Commitments Compliance Table

Fauna, Habitat and Offset Management Plan (approved by the delegate of the Minister on 15 December 2025) | ACR period 1: 29 August 2025 to 28 August 2026

Prepared to satisfy condition 20(a)(iii), 20(b) and 20(c) of EPBC 2023/09576 and section 3.5 of the Annual Compliance Report Guidelines, Commonwealth of Australia 2023, which requires that the specifics in a management plan supporting an approval condition are detailed in the compliance report and that material is provided demonstrating the requirements of that plan have been implemented.

The commitments listed below were compiled from the approved Fauna, Habitat and Offset Management Plan. The plan approved by the delegate of the Minister on 15 December 2025 is "Revision C, Signed 9 December 2025".

Use only the three designations permitted by section 3.7 of the Guidelines: Compliant, Non-compliant, Not applicable.

Timing: the FHOMP was approved on 15 December 2025 and implementation commenced on 29 January 2026, being the date work commenced on site under the plan. The department was notified by letter of that date. Commitments in the approved plan therefore bite for 29 January 2026 to 28 August 2026, being part only of ACR period 1 (29 August 2025 to 28 August 2026). Each commitment below is assessed against that period.

Ref	FHOMP reference	Commitment	Type	Compliant / Non-compliant / Not applicable	Evidence / comments
Plan governance, records and internal assurance					
B1	Section 5.1 / Table 5-1	Roles and responsibilities for delivery of the FHOMP are assigned through the Sorby Environmental Management System, including overall responsibility for achievement of environmental objectives and targets.	Governance	Compliant	Roles and responsibilities for delivery of the FHOMP are assigned through the Sorby Environmental Management System. The Senior Environmental and Approvals Advisor holds responsibility for the plan and for its objectives and targets.
B2	Section 5.4	Maintain records of obligations, audits, stakeholder consultation and corrective and preventative actions on OneDrive within the SMPL EMS.	Records	Compliant	Obligations, audits, stakeholder consultation and corrective and preventative actions are maintained under the SMPL Environmental Management System, with the compliance register held as PML-SM-HSE-PLN003.
B3	Section 5.5.2.1	Conduct compliance audits of the Project, including contractor activities, in accordance with the SMPL Environment and Community Department inspection and audit schedules, on a risk-based frequency.	Internal audit	Not applicable	No compliance or performance audit fell due during the ACR period. The audit frequency under FHOMP section 5.5.2.1 is risk-based.
B4	Section 5.5.2.1	Record findings of compliance and performance audits in OneDrive, including allocation of actions to responsible persons, agreed timeframes, and tracking of corrective actions to close out.	Internal audit	Not applicable	No audit was conducted during the ACR period, so there were no findings to record.
B5	Section 6.5	Review the objectives and targets of the FHOMP at least three-yearly.	Plan review	Not applicable	The first three-yearly review of the plan's objectives and targets falls due by 29 January 2029.
Avoidance and mitigation - planning and design (Table 7-1)					
B6	Table 7-1	No disturbance occurs within the development exclusion zone.	Management measure	Compliant	No disturbance occurred within the development exclusion zone. Recorded at Table 1-3 as 0 ha.
B7	Table 7-1	Ensure all required licences and permits are obtained prior to clearing activities commencing.	Management measure	Compliant	All required licences and permits were obtained before clearing activities commenced.
B8	Table 7-1	As far as practicable, fauna and habitat surveys are to be carried out over an area larger than the disturbance footprint to enable an informed assessment of potential impacts.	Management measure	Not applicable	No fauna or habitat survey was carried out during the ACR period.
B9	Table 7-1	Working within the constraints of engineering and economic feasibility, ensure the development is designed to avoid direct impact to important habitat and to maximise use of pre-cleared/disturbed areas, thereby minimising clearing requirements.	Management measure	Compliant	The development is designed to avoid direct impact to important habitat and to maximise use of pre-cleared and previously disturbed areas.
B10	Table 7-1	Integrated Waste Landform to be designed consistent with the adjoining Pincombe Range and planted using vegetation to support extension of habitat for Gouldian Finch, Northern Quoll and Northern Crested Shrike-tit.	Management measure	Compliant	The Integrated Waste Landform has been designed consistent with the adjoining Pincombe Range and to support habitat extension. The landform was not constructed during the ACR period, so the planting element had not fallen due.
Avoidance and mitigation - staff, training and awareness (Table 7-1)					
B11	Table 7-1	Ensure all staff are appropriately inducted and trained in the environmental aspects relevant to their positions, for example clearing and habitat preservation, fauna identification, fire prevention and control.	Management measure	Compliant	Staff were inducted and trained in the environmental aspects of their work. Recorded in the induction register.

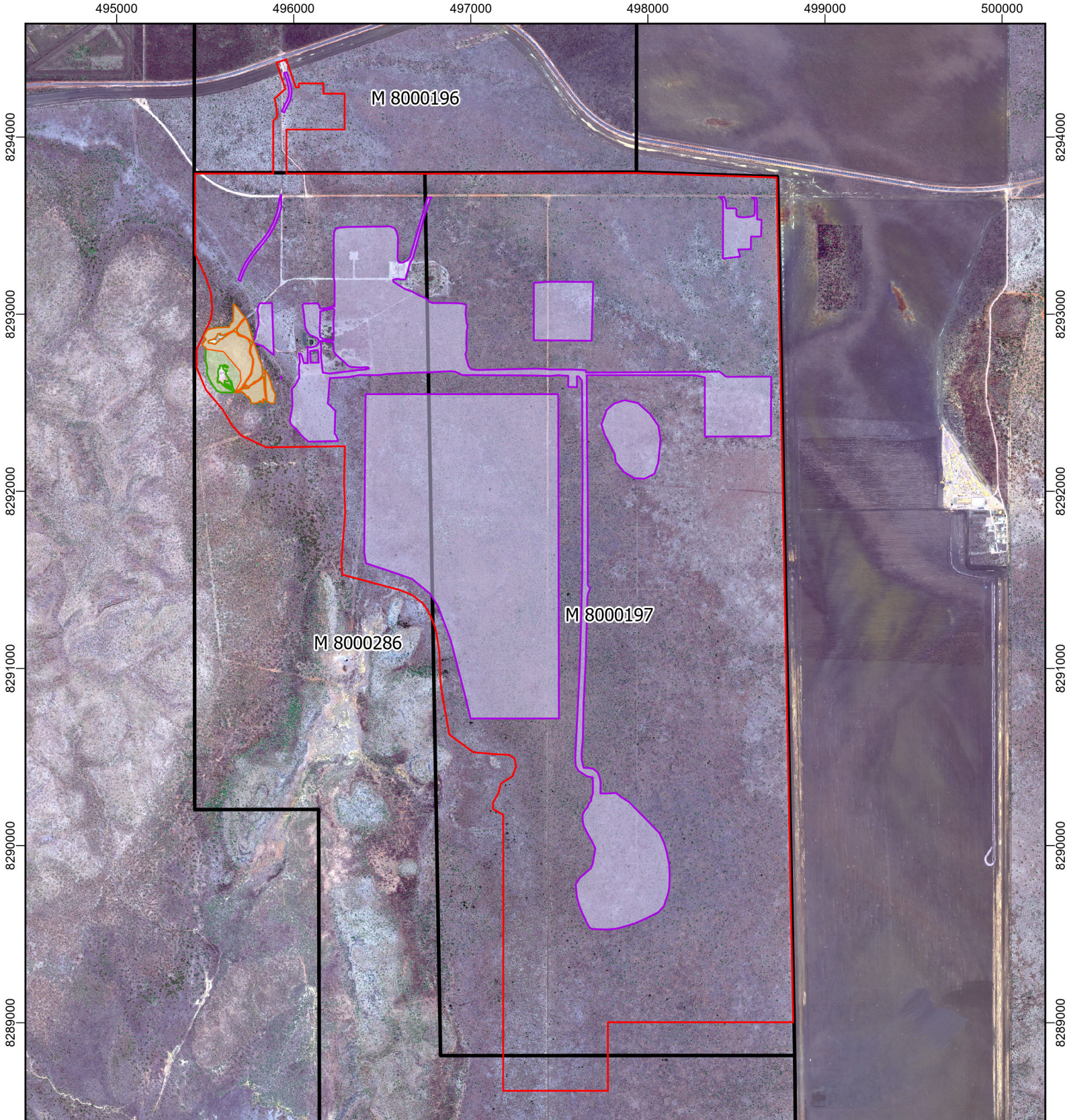
Ref	FHOMP reference	Commitment	Type	Compliant / Non-compliant / Not applicable	Evidence / comments
B12	Table 7-1	All personnel who participate in training are to update their Training Register Form and the induction supervisor must ensure a Training Record of Attendance Form is completed.	Management measure	Compliant	The Training Register Form and the Training Record of Attendance Form were both in use during the ACR period.
B13	Table 7-1	Establish and maintain a ground disturbance register to monitor compliance with environmental requirements.	Management measure	Compliant	A ground disturbance register is established and maintained, recording the location, date and area of all disturbance.
Avoidance and mitigation - operational controls and rehabilitation (Table 7-1)					
B14	Table 7-1	Undertake ground disturbance only in accordance with a valid ground disturbance permit.	Management measure	Compliant	Ground disturbance was undertaken only under a valid ground disturbance permit.
B15	Table 7-1	All approved disturbance activities to be clearly delineated on ground and communicated to the relevant contractor.	Management measure	Compliant	Approved disturbance areas were delineated on ground and communicated to the workforce.
B16	Table 7-1	Routine observations of fauna presence at or near water storage structures to be reviewed at least monthly to check effectiveness of deterrent devices and update need for additional controls.	Management measure	Not applicable	No water storage structure was operational during the ACR period.
B17	Table 7-1	Previously disturbed areas that are no longer required shall be rehabilitated as soon as practicable; progressive rehabilitation shall be conducted throughout the Project life and revegetation continued after cessation of mining.	Management measure	Not applicable	No area that was no longer required became available for rehabilitation during the ACR period.
B18	Table 7-1	All temporary construction infrastructure and facilities are to be removed prior to rehabilitation.	Management measure	Not applicable	Rehabilitation had not commenced during the ACR period.
Avoidance and mitigation - weed, pest and fire control (Table 7-1)					
B19	Table 7-1	All machinery, vehicles and plant which arrive on site are to be inspected and confirmed as free of soil and vegetative matter or cleaned as necessary; clean vehicles and equipment regularly in the wash down facility.	Management measure	Compliant	Machinery, vehicles and plant arriving on site were inspected and cleaned under the Weed Hygiene Protocol, PML-SM-HSE-PRO-0020, and the Weed Spraying Rev B.
B20	Table 7-1	During operations, inspect and map weeds and maintain a weed inventory. Implement weed control through construction and operations.	Management measure	Compliant	Weeds were inspected and mapped and a weed inventory maintained. Roadside weed treatment was completed in July 2026 under PO 286.
B21	Table 7-1	Implement cane toad monitoring and control program, in accordance with DBCA and local management programs.	Management measure	Compliant	Cane toad monitoring was implemented and numbers are recorded in the feral animal site register. No increase was observed, so no control action was triggered. CORP-EN-WI-1005 was in force and cane toad induction and training was delivered.
B22	Table 7-1	All vehicles are to remain on designated tracks to avoid disturbance and seed or soil transfer.	Management measure	Compliant	All vehicles remained on designated tracks. No off-track disturbance was recorded.
B23	Table 7-1	Undertake post-rehabilitation monitoring for weed or pest animal invasion and implement weed / pest animal control if required.	Management measure	Not applicable	Rehabilitation had not commenced during the ACR period.
B24	Table 7-1	Operate a procedure and permitting process for all hot work; hot work is not to be conducted in fire risk areas or on days deemed to have a high fire risk.	Management measure	Compliant	A hot work procedure and permitting process operated throughout the ACR period. No hot work was conducted in fire risk areas or on high fire risk days.
B25	Table 7-1	Ensure facilities comply with Local Government fire prevention requirements, correct storage and isolation of flammable substances, safe smoking practices, minimisation of fuel load (including fire breaks and burning), and appropriate fire response equipment located onsite.	Management measure	Compliant	Facilities complied with Local Government fire prevention requirements. Firebreak works at the Sorby Hills campsite were completed in September 2025.
B26	Table 7-1	Collaborate with DBCA and Traditional Owners in controlled mosaic burns in vegetated, non-operational areas.	Management measure	Compliant	A controlled mosaic burn of 23 ha was completed in June 2026 within the development envelope.
Performance objectives and targets - threatened fauna and habitats (Table 6-9)					
B27	Table 6-9	Limit clearing to no more than 16.1 ha of suitable Gouldian Finch habitat; clearing to occur at edge of mapped suitable habitat to avoid fragmentation.	Performance target	Compliant	11.15 ha of Gouldian Finch habitat was cleared against the 16.1 ha limit. Reported at Table 1-3.
B28	Table 6-9	Limit clearing to no more than 12.5 ha of suitable Northern Crested Shrike-tit habitat; clearing to occur at edge of mapped suitable habitat to avoid fragmentation.	Performance target	Compliant	8.16 ha of Northern Crested Shrike-tit habitat was cleared against the 12.5 ha limit. Reported at Table 1-3.
B29	Table 6-9	Limit clearing to no more than 562.4 ha of suitable Australian Painted Snipe habitat.	Performance target	Compliant	303.16 ha of Australian Painted Snipe habitat was cleared against the 562.4 ha limit. Reported at Table 1-3.

Ref	FHOMP reference	Commitment	Type	Compliant / Non-compliant / Not applicable	Evidence / comments
B30	Table 6-9	Establish and maintain exclusion area over better quality habitat.	Management measure	Compliant	The exclusion area over better quality habitat was established and maintained. No disturbance occurred within it.
B31	Table 6-9	No significant changes to surface water quality from baseline levels (Australian Painted Snipe foraging habitat); surface water quality monitoring and retention of excess water within the Project disturbance footprint.	Performance target	Compliant	Surface water quality monitoring recorded no significant change from baseline. Excess water was retained within the disturbance footprint.
B32	Table 6-9	No Project-initiated fires.	Performance target	Compliant	No Project-initiated fire occurred during the ACR period.
B33	Table 6-9	70 ha/year of mosaic burns within the Project development envelope.	Performance target	Not applicable	The approved plan was in force for part only of ACR period 1. It was approved on 15 December 2025, implementation commenced on 29 January 2026, and personnel were not mobilised to site until April 2026, part-way through the early dry season burn window. No complete annual cycle of the burn program fell within ACR period 1, so the target had not fallen due for assessment. One controlled mosaic burn covering 23 ha was completed in June 2026
B34	Table 6-9	No impacts to Northern Quoll denning areas; avoid clearing of denning areas and apply a 50 m buffer to any denning habitats.	Performance target	Compliant	No Northern Quoll habitat was cleared and no denning habitat was identified, so the 50 m buffer was not triggered.
B35	Table 6-9	Any increase in cane toad numbers in the local area is not attributable to Project activities.	Performance target	Compliant	No increase in cane toad numbers was observed in the local area. Numbers are recorded in the feral animal site register.
B36	Table 6-9	No death of MNES species attributable to Project operations; speed limit restrictions within 1 km radius of Northern Quoll denning habitat and reporting of fauna deaths.	Performance target	Compliant	No fauna death or injury was recorded. A fauna death and injury register is maintained.
B37	Table 6-9	Flood modelling indicates no significant impacts to hydrology regimes; site layout designed to minimise impacts on hydrology regimes and excess water retained within the Project footprint.	Performance target	Compliant	Flood modelling indicates no significant impact to hydrology regimes. Excess water is retained within the Project footprint.
Monitoring (Table 5-3 and Table 7-1)					
B38	Table 5-3	Dust monitoring - monthly, per Dust Monitoring Procedure.	Monitoring	Compliant	Dust monitoring was carried out monthly from the date it commenced. Results are held in the dust results register.
B39	Table 5-3	Ground disturbance monitoring - monthly, per Ground Disturbance Procedure.	Monitoring	Compliant	Ground disturbance monitoring was carried out monthly. The dataset is held as the fauna habitat disturbance dataset.
B40	Table 5-3	Weed inspection - annual, per EMP.	Monitoring	Compliant	Weed inspections were carried out monthly as part of the monthly environmental inspection, exceeding the annual requirement.
B41	Table 5-3	Rehabilitation monitoring - annual, per EMP.	Monitoring	Not applicable	Rehabilitation had not commenced, so no rehabilitation monitoring.
B42	Table 5-3	Surface water monitoring - following flood events, per Surface Water Procedure.	Monitoring	Not applicable	No flood event occurred during the ACR period.
B43	Table 5-3	Feral animal activity - ongoing, per EMP.	Monitoring	Compliant	Feral animal activity is recorded on an ongoing basis in the animal sighting register.
B44	Table 5-3	Threatened fauna register - ongoing, per EMP.	Monitoring	Compliant	The threatened fauna register is maintained in the animal sighting register. Records are included in the condition 18 submission.
B45	Table 5-3	Inspection of water infrastructure - annual, per Surface Water Procedure.	Monitoring	Not applicable	No water infrastructure was operational during the ACR period.
B46	Table 5-3	Groundwater monitoring - as per the Groundwater Operating Strategy.	Monitoring	Not applicable	The Groundwater Operating Strategy was not in effect during the ACR period. Groundwater monitoring commenced in April 2026.
B47	Table 5-3	Heavy metal analysis (bird feathers) - quarterly, per Fauna Management Procedure.	Monitoring	Not applicable	The tailings storage facility was not operational during the ACR period.
B48	Table 5-3	Soil and sediment monitoring - quarterly, per Heavy Metals Survey and Management Procedure.	Monitoring	Not applicable	The tailings storage facility was not operational during the ACR period.
B49	Table 5-3	Planned observations of presence/absence of birds and/or other fauna at the TSF - daily, per TSF Daily Inspections.	Monitoring	Not applicable	The tailings storage facility was not operational during the ACR period.
B50	Table 5-3	Monitoring of TSF supernatant water quality - monthly, per TSF Operating Manual.	Monitoring	Not applicable	The tailings storage facility was not operational during the ACR period.

Ref	FHOMP reference	Commitment	Type	Compliant / Non-compliant / Not applicable	Evidence / comments
B51	Table 7-1	Ground disturbance is mapped monthly and areas progressively rehabilitated are mapped annually.	Monitoring	Compliant	Ground disturbance was mapped monthly. No area was progressively rehabilitated, so no annual rehabilitation mapping was required.
B52	Table 7-1	Annual reconciliation of the extent of habitat disturbance for each threatened fauna habitat suitability category.	Monitoring	Compliant	Habitat disturbance was reconciled for each threatened fauna species and is reported at Table 1-3.
B53	Table 7-1	Fires and fire management activities mapped after works completed.	Monitoring	Compliant	The June 2026 controlled mosaic burn was mapped after works were completed. The mapping is held on the project file.
B54	Table 7-1	Monitoring of water levels adjacent to the Project disturbance during the wet season to validate hydrological modelling.	Monitoring	Compliant	Water levels adjacent to the Project disturbance were monitored during the wet season. Results are held in the standing water level register.
B55	Table 7-1	Annual inspection of the exclusion area to document habitat condition, check for presence of threatened species and verify that exclusion rules have been adhered to.	Monitoring	Compliant	The exclusion area was inspected and its habitat condition documented.
B56	Table 7-1	Maintain records of fauna observed at the TSF and water storage structures, and fauna injury / mortality records.	Monitoring	Not applicable	The tailings storage facility and water storage structures were not operational during the ACR period.
Offset delivery and direct offsets (Sections 8.3 - 8.7)					
B57	Section 8.5.1	Resource the implementation of a prescribed burning program within the Goomig Conservation Park, drawing on Dawawang fire knowledge, sufficient to allow a 3-year low-intensity burning cycle over a nominal 2,000 ha area of the conservation park.	Offset commitment	Not applicable	The offset actions in section 8 of the approved plan had not commenced. Section 8.3 defers the funding timeframe and the offset schedule to consultation with DCCEEW, DBCA and the MG Corporation, which had not concluded.
B58	Section 8.5.1	Fund DBCA and the Miriuwung Gajerrong Rangers to monitor and report on the effectiveness of the prescribed burning program.	Offset commitment	Not applicable	The offset burning program had not commenced, so there was nothing to monitor or report on.
B59	Section 8.5.2	Resource annual weed assessments and control in susceptible areas within the proposed Goomig Conservation Park.	Offset commitment	Compliant	Weed survey and treatment covering 50 ha was carried out at Goomig Lot 15 on 10 November 2025, resourced by the approval holder.
B60	Section 8.5.2	If requested by the Yoorrooyang Dawang Regional Park Council, resource 2-yearly on-country training of rangers in weed identification and control.	Offset commitment	Not applicable	No request was made by the Yoorrooyang Dawang Regional Park Council during the ACR period.
B61	Section 8.6	Agree priorities for indirect offset contributions addressing knowledge gaps in consultation with DCCEEW, DBCA and Traditional Owners.	Offset commitment	Not applicable	Indirect offset priorities had not been agreed. FHOMP section 8.6 sets no date for that agreement.
B62	Section 8.7	Allocate offset funding approximately 45% to fire management, 45% to weed and pest management and 10% to indirect offsets (provisional allocation).	Offset commitment	Not applicable	No offset funding was allocated during the ACR period. The allocation in FHOMP section 8.7 is expressly provisional.
Offset performance objectives and targets (Table 8-3)					
B63	Table 8-3	Offset area (~2,000 ha) to be burned at least once in three years (average of ~700 ha/year, subject to seasonal conditions).	Offset target	Not applicable	The offset burning program had not commenced.
B64	Table 8-3	Extent of high intensity wildfires to be no greater in offset areas and the project development envelope than in an equivalent sized reference area.	Offset target	Not applicable	The offset program had not commenced, so no reference area comparison was available.
B65	Table 8-3	Within 6 years of commencement of offset action, grass seed availability in managed areas to be significantly greater than reference site seed availability.	Offset target	Not applicable	Offset action had not commenced, so the six year period had not begun.
B66	Table 8-3	Within 6 years of commencement of offset action, grass seed quality in managed areas is significantly better than reference site seed quality.	Offset target	Not applicable	Offset action had not commenced, so the six year period had not begun.
B67	Table 8-3	Frequency of burnt hollow-bearing trees (hollows/ha) in managed areas is less than the number of burnt hollow-bearing trees in reference areas.	Offset target	Not applicable	The offset program had not commenced, so no reference area comparison was available.
B68	Table 8-3	Within 6 years of commencement of offset action, occurrence of Gouldian Finches and/or Northern Crested Shrike-tits in managed areas is significantly greater than occurrence in reference sites.	Offset target	Not applicable	Offset action had not commenced, so the six year period had not begun.
B69	Table 8-3	Weed frequency in treated areas 2 years post-treatment is no more than 10% higher than in reference sites.	Offset target	Not applicable	No offset weed treatment had been carried out, so no two year measurement point had arisen.

Ref	FHOMP reference	Commitment	Type	Compliant / Non-compliant / Not applicable	Evidence / comments
B70	Table 8-3	Number of weed species in treated areas 2 years post-treatment is no greater than in reference sites.	Offset target	Not applicable	No offset weed treatment had been carried out, so no two year measurement point had arisen.
B71	Table 8-3 / Section 8.8.1	Define target outcomes for the extent of weed management activities following consultation with DBCA and Traditional Owners (target recorded as TBA in the approved plan).	Offset target	Not applicable	Target outcomes for weed management had not been agreed and remain recorded as TBA in the approved plan.
Offset monitoring, evaluation and contingency (Section 8.8)					
B72	Section 8.8.2	Track the implementation status of offset actions by recording the extent of land over which low-intensity burns, weed management and (if applicable) destocking has occurred (ha/year), and by compiling maps of 'time since last burnt' over the offset area.	Monitoring	Not applicable	No offset actions were carried out during the ACR period, so there was nothing to track.
B73	Section 8.8.2	Carry out habitat quality monitoring prior to the start of the threat abatement program and then annually following the start of the offset actions, in treated offset sites and in reference sites agreed with DBCA and MG Corporation.	Monitoring	Not applicable	The threat abatement program had not commenced.
B74	Section 8.8.3	Carry out targeted surveys for the presence/absence of Gouldian Finches and Northern Crested Shrike-tits in offset areas before commencement of the threatening factor abatement program and then annually for the first five years of offset implementation.	Monitoring	Not applicable	The threat abatement program had not commenced, so the pre-commencement surveys had not fallen due.
B75	Section 8.8.3	Review monitoring results at least annually and include them in annual performance and compliance reports submitted to DCCEEW, DBCA, EPA and DMPE.	Reporting	Not applicable	No offset monitoring results existed for the ACR period.
B76	Section 8.8.3	If any habitat quality indicator is declining, complete a review of offset activities in consultation with DBCA, Traditional Owners and subject matter experts at least 4 months before the scheduled start of the next season of offset activities.	Corrective action	Not applicable	No habitat quality indicator was monitored during the ACR period, so the review was not triggered.
B77	Section 8.8.3	If the extent of low intensity burns does not reach scheduled targets in a given year, carry the work over to the following year.	Corrective action	Not applicable	No offset burn target was scheduled for the ACR period, so the carry-over provision was not engaged.
B78	Section 8.8.3	At Year 5, commission a comprehensive review of the offset program by an independent expert to assess whether there is compelling evidence that offset actions are maintaining or improving habitats for the three target species.	Plan review	Not applicable	The offset program had not commenced, so Year 5 had not been reached.
B79	Section 8.8.3	If monitoring results do not show objective evidence of ecological benefits, discuss a modified offset approach with DCCEEW, DBCA, Traditional Owners and the EPA and continue annual monitoring to assess the modified offset actions.	Corrective action	Not applicable	No offset monitoring results existed for the ACR period.
Reporting, incidents and plan review (Section 9 and Table 7-1)					
B80	Section 9.1	Provide details of the progress of the outcomes of this Plan annually to DCCEEW in the Compliance Assessment Report, including evaluation of monitoring results associated with threat abatement programs and activities associated with the Plan undertaken in the previous 12 months.	Reporting	Compliant	Progress against the outcomes of the plan is reported to DCCEEW in this compliance report.
B81	Section 9	Redact sensitive ecological information from publicly available reports and, within 5 business days of publication, notify DCCEEW that the report has been redacted and provide an unredacted version.	Reporting	Not applicable	No report was published during the ACR period. Publication of this report falls due by 25 September 2026.
B82	Table 7-1	Map the extent of ground disturbance and report it in annual performance / compliance reports; deliver annual performance and compliance reporting to DCCEEW, DEMIRS and DWER.	Reporting	Compliant	The extent of ground disturbance is mapped and reported at Table 1-3. Annual reporting was delivered to DCCEEW through this report, to DWER through the MS964 Annual Compliance Assessment Report, and to DEMIRS through the Mine Closure Plan and Annual Environmental Report.
B83	Table 7-1	All fires in and around the Project are to be reported immediately to the Registered Manager.	Reporting	Not applicable	No unplanned fire occurred in or around the Project during the ACR period.
B84	Table 7-1	Incidents and non-compliance events to be notified in accordance with statutory requirements; all non-compliances are recorded as environmental incidents and appropriate actions issued and managed in the incident management system.	Corrective action	Compliant	No incident or non-compliance occurred during the ACR period.
Key performance indicators (Table 7-1)					
B85	Table 7-1	No unauthorised clearing.	KPI	Compliant	No unauthorised clearing occurred. All clearing was within the development envelope and within the condition 2 limits.

Ref	FHOMP reference	Commitment	Type	Compliant / Non-compliant / Not applicable	Evidence / comments
B86	Table 7-1	No unauthorised impacts to vegetation, priority species or priority ecological communities.	KPI	Compliant	No unauthorised impact to vegetation, priority species or priority ecological communities occurred.
B87	Table 7-1	No death of vegetation from dust.	KPI	Compliant	No death of vegetation from dust was observed. Results are held in the dust results register.
B88	Table 7-1	No preventable unplanned fires. Natural fires controlled appropriately.	KPI	Compliant	No preventable unplanned fire occurred and no natural fire required control.
B89	Table 7-1	Containment of weed infestations. Successful rehabilitation of cleared areas.	KPI	Not applicable	Rehabilitation had not commenced. Weed management actions delivered during the period are recorded at B19, B20, B40 and B59.



Legend

-  Australian painted snipe foraging habitat
-  Gouldian finch breeding habitat
-  Northern crested shrike tit possible habitat
-  Approved Development Envelope
-  Current Tenements

Appendix C - Clearing of protected matter habitat within the development envelope

Creator: Rory Embleton

Date: 16/09/2026

File Name: NA

Spatial Reference
Name: GDA 1994 MGA Zone 52

Sorby
MANAGEMENT PTY LTD

