

COMPLIANCE ASSESSMENT REPORT MINISTERIAL STATEMENT 916

KEMERTON SILICA SAND PROJECT

PREPARED FOR:

KEMERTON SILICA SAND PTY LTD



FEBRUARY 2024

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MINISTERIAL STATEMENT 916 COMPLIANCE ASSESSMENT REPORT

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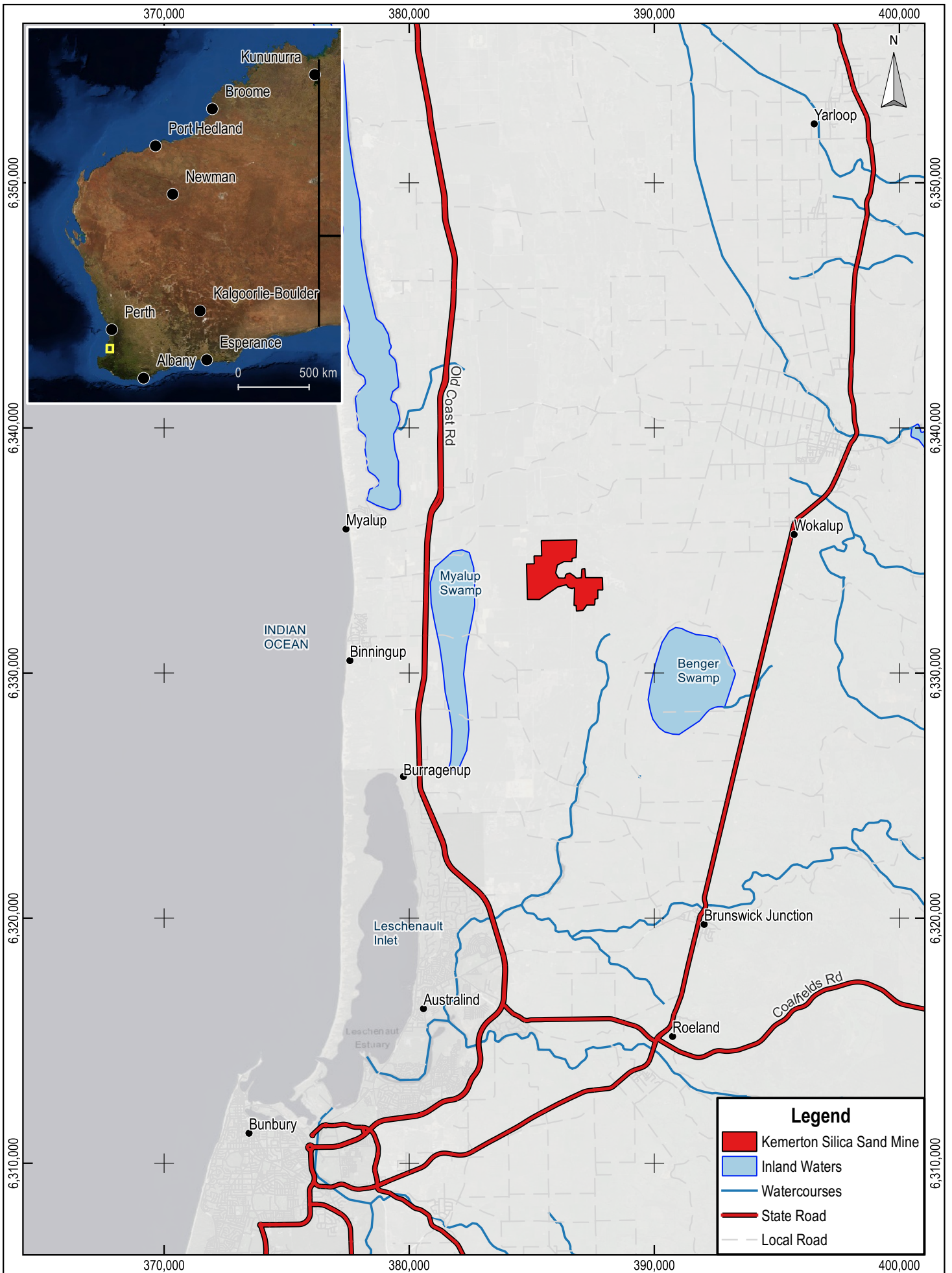
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1. INTRODUCTION

Kemerton Silica Sand Pty Ltd (KSS) owns and operates the Kemerton Silica Sand Project (the Project), which is a sand dredging operation located 35 km north of Bunbury in the South West region of Western Australia (Figure 1). The Kemerton Silica Sand Project commenced in April 1996 and is currently operated under the conditions of approval set out in Ministerial Statements (MS) 366 and 703.

In 2009, KSS proposed an extension to the approved and current mining area which was formally assessed under Part IV of the *Environmental Protection Act* (EP Act). On 12 November 2012, the Western Australian Minister for Environment granted conditional approval for the expanded mining area via MS 916 (Figure 2).

Conditions 4-3 and 4-6 of MS 916 require KSS to assess compliance of the Project with MS 916 and associated Management Plans annually, in accordance with the approved Compliance Assessment Plan (CAP). The Compliance Assessment Report (CAR) is to be submitted to the Department of Water and Environmental Regulation (DWER) by 28 February each year. CARs as required by MS 916 have been submitted annually since 2014. This CAR satisfies these requirements.



Scale: 1:200000
 Original Size: A4
 Image: Copernicus Sentinel Data 2020
 Grid: GDA94 / MGA zone 50

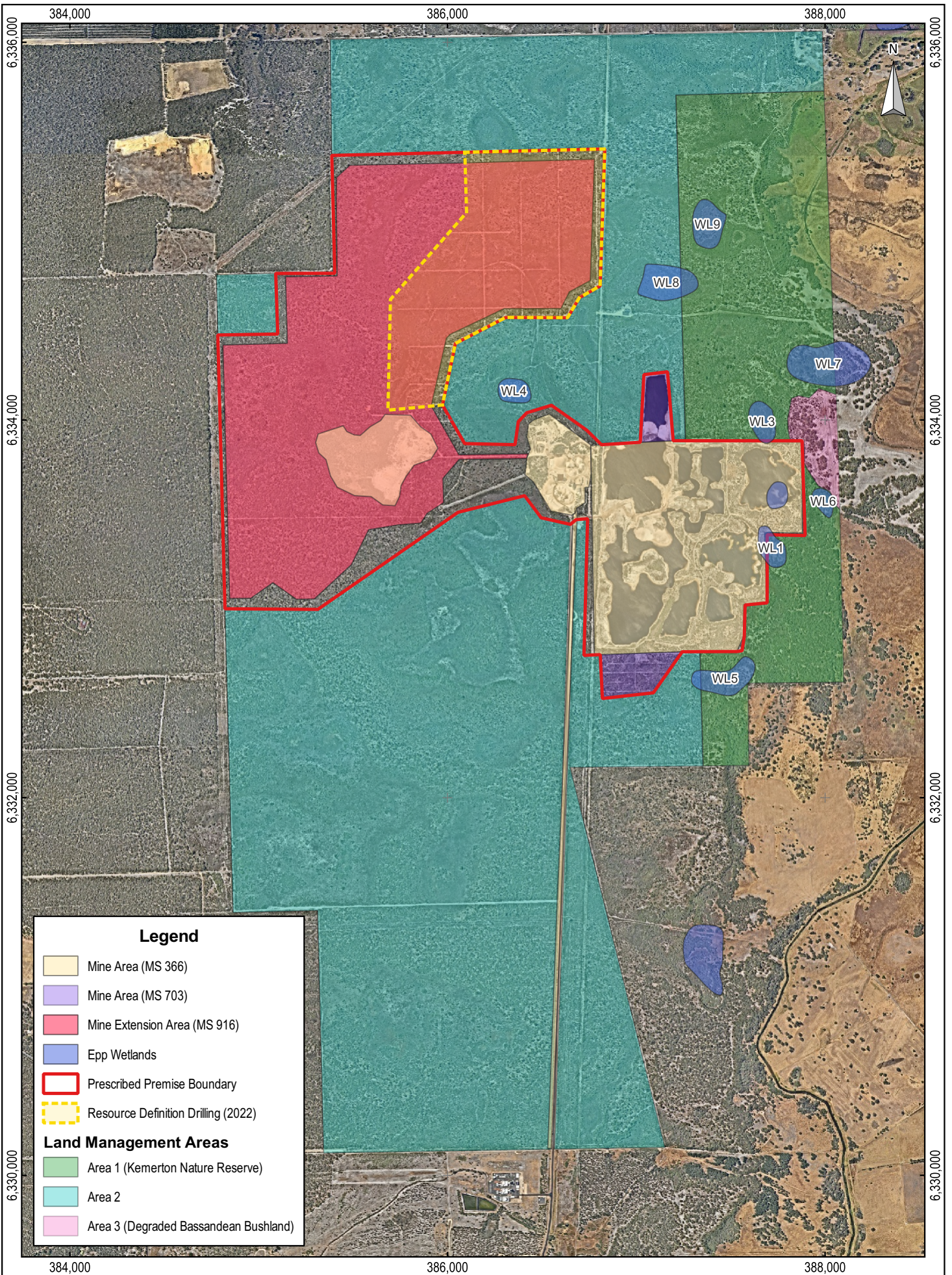
0 2.5 5 km

Kemerton Silica Sand Pty Ltd
Kemerton Silica Sand Mine

Figure 1
Location Plan

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Scale: 1: 26,000
 Original Size: A4
 Grid: GDA94 / MGA zone 50

0 250 500 m

Kemerton Silica Sand Pty Ltd
 Kemerton Silica Sand Mine

Figure 2
Site Layout and KNRMP Land Management Areas

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2. KEMERTON NATURE RESERVE MANAGEMENT PLAN

Three areas of land have been transferred to the State by KSS to form the Proposed Kemerton Nature Reserve (PKNR). These areas have been transferred as part of offset requirements of Ministerial Statements 366 (MS 366), 703 (MS 703) and 916 (MS 916) and are known as Areas 1, 2 and 3 (Figure 2).

Land transfers under Ministerial Statements and relevant conditions are provided in Table 1, noting that this CAR will assess compliance against requirements of MS 916 alone in line with Conditions 4-3 and 4-6.

Table 1: Requirements of Ministerial Statement 916 and Land Transfers to the Proposed Kemerton Nature Reserve

Ministerial Statement	Condition	Requirements	Date of Transfer	Offset (ha)	Areas Presented in Figure 2
MS 366	3-1	Environmental offset for approval to mine, consisting of the transfer of 196.7 ha to the State of Western Australia for addition into the conservation reserve system.	August 1999	206.9	Area 1 including Area 3
MS 703	5-1	Transfer of 15.6 ha of an identified TEC, Muchea Limestone, to the State to be included in the Conservation Estate.	November 2005	15.6	Included in Area 1
MS 916	12-1	Environmental offset for approval to mine in western extension consisting of the transfer of proponent owned land totalling 844.1 ha to the State for addition into the conservation reserve system.	January 2018	844.1	Area 2
	12-2	Submission of a management plan for the PKNR which should specify the nature, timing, and duration of the ongoing management activities to be undertaken by the proponent and the methodology, completion criteria, and timing for the rehabilitation of the degraded area of Bassendean woodland within the PKNR.	NA	NA	Areas 1 and 3
Current PKNR Area				1,056.4*	

* Actual offset transfer areas differ slightly to MS requirements and cadastral boundaries.

The land transfers triggered Condition 12-2 of MS 916, which required KSS to submit a Management Plan for the areas that form the PKNR. The Kemerton Nature Reserve Management Plan (KNRMP) was prepared in consultation with the Department of Water and Environmental Regulation (DWER) and the Department of Biodiversity, Conservation and Attractions (DBCA) and was approved on 12 November 2020. Due to the fact that the transfers of land to form the PKNR occurred in three separate transactions relating to three different Ministerial Statements, the management responsibilities of KSS for each area differ and have been assigned based on management requirements and responsibility.

Management of Area 1 is the responsibility of DBCA, however KSS have historically provided assistance as a 'good neighbour' to manage the area, particularly with respect to weed and feral animal control and will continue to do so in the future, however ultimate responsibility for implementation of management actions rests with DBCA. Management of Area 2 is the responsibility of KSS and inherently the requirements of the KNRMP are applicable to this area. Land management of Area 3 is the responsibility of DBCA; however, rehabilitation and management of

weeds and feral animals is the responsibility of KSS, in consultation with DBCA and Western Power, and as such is within the scope of the KNRMP.

Condition 12-3 of MS 916 stipulates that KSS and DWER must implement the KNRMP and therefore this CAR will also assess implementation of the KNRMP.

3. ACTIVITIES UNDERTAKEN DURING THE REPORTING PERIOD

3.1 GROUND DISTURBANCE ACTIVITIES

No ground-disturbing activities were undertaken during the reporting period and no ground-disturbing activities are scheduled for the 2024 period.

A resource definition drilling program was undertaken in the northeastern section of the MS 916 proposal area during 2022 (Figure 2). The drilling program required minimalistic raised blade clearing to create temporary access tracks for drill rigs and light vehicles, with drilling occurring along drill tracks. Topsoil and woody debris generated from raised blade clearing was re-spread throughout the Project areas to further encourage rehabilitation activities. Some of this material was used in Area 3 of the PKNR (Section 3.3) as part of rehabilitation commitments required by the approved offset. The drilling was required to gain more detailed information for input into the dredge pond design ahead of commencement of mining.

Given the minimalistic and low-impact nature of clearing associated with the drilling program, as well as the proposal as described by MS 916, the drilling program did not constitute 'ground disturbance' for the purpose of MS 916. All environmental management measures conditioned by MS 366 and MS 703 were implemented throughout drilling program in the MS 916 proposal area. Further details on management measures and compliance are described in Appendix 1.

3.2 LAND MANAGEMENT ACTIVITIES (AREAS 1 AND 2)

The KNRMP requires KSS to implement regular weed, feral animal, and fire control programs in Area 2 for the duration of mining activities. In addition, the KNRMP requires regular maintenance of firebreaks, tracks and fences surrounding Area 1.

KSS continued to complete weed, feral animal, and fire management activities within Areas 1 and 2 during the current reporting period. The outcomes of these land management activities were detailed in the submission of the CAR for MS 366 and 703.

It is noted that eight incidents relating to unauthorised access occurred during the reporting period. There were two separate incidents of both human and dog footprints being observed along the tracks within the area, as well as one incident of pig hunters scaring a group of pigs off of a baiting station. Three separate incidents were recorded involving unauthorised motorbikes traveling along KSS tracks and through wetlands on the eastern, northern, and western boundaries. During a boundary inspection it was noted that a portion of the fence had been cut for the entry of an unauthorised public vehicle on the southeast boundary. The fence was repaired. There was also one incident of several rounds of gun fire being heard approximately 60 m northeast of Wetland 5. These types of incidents are an ongoing issue for management of the PKNR and are similar to unauthorised access incidents of the last reporting period.

3.3 REHABILITATION (AREA 3)

Area 3 comprises part of the area of land transferred to the State in accordance with Condition 3-1 of MS 366. It comprises 11 ha of degraded Bassendean woodland located on the eastern boundary of the original PKNR (Lot 201 on Deposited Plan 63845) that was historically grazed and logged. MS 916 requires that the vegetation condition and habitat value of this area is improved in consultation with the land owners (DBCA) and Western Power as per Condition 12-2. DBCA has land management responsibility for Lot 201 (Section 2). Rehabilitation and management of weeds and feral animals in Area 3 is the responsibility of KSS and as such is within the scope of the KNRMP.

KSS conducted initial rehabilitation trials within Area 3 during the 2019 and 2020 reporting period. This consisted of two plots; both of which were seeded and or planted with seedlings, with fertiliser introduced to the 2020 trial plot.

Vegetation failed to establish, likely due to noticeably poor soil and site characteristics (water repellent, poor water holding capacity, low observable organic carbon and likely low nutrient status). Small-scale planting of tubestock was undertaken in 2021 in disturbed areas with limited survival.

During the reporting period there was no rehabilitation activities carried out within Area 3. Informal monitoring of the topsoil and woody debris spreading completed during the last reporting period noted an increased level of survivability of the germinating seeds within the spread topsoil. The seeds and tubestock dispersed during the 2022 period as well as the surrounding remnant bushland were observed to be having less success with survivability due to very dry conditions. KSS are working with Mattiske Consulting to develop both formal monitoring transects and appropriate analogues for Area 3 and these will be surveyed in future monitoring periods.

3.4 MONITORING PROGRAMS

During the reporting period, monitoring of groundwater water levels and quality was carried out and reported to DWER, as required by Groundwater Licence (GWL) 60367(4). This will continue to provide several years of baseline groundwater data prior to commencement of mining in the MS 916 expansion area.

4. ASSESSMENT OF COMPLIANCE WITH MINISTERIAL STATEMENT 916

Compliance with MS 916 has been determined via a desktop audit of activities at KSS for the reporting period from 1 January 2023 to 31 December 2023. Kristy Sell (Managing Director and Environmental Auditor), Ian Mullins (Senior Environmental Scientist and Auditor) and Alyse Lupardo (Graduate Environmental Scientist) from MBS Environmental (MBS) conducted the audit in February 2024, which consisted of discussions with KSS employees and a review of relevant documentation. Observations made during a site visit on 19 September 2023 as part of audit of compliance with MS 366 and MS 703 were also taken into consideration.

During the reporting period, KSS was found to be largely compliant with all relevant conditions of MS 916, identifying 11 'Compliant', seven 'Completed', and no 'In Progress' status conditions. The remainder of the conditions are 'Not Required' to be implemented at this stage.

4.1 INTERNAL AUDITS

As mining has not commenced, no internal audits for MS 916 were undertaken during the reporting period.

4.2 EXTERNAL AUDITS

MBS conducted a site visit and external audit in September 2023, with Kristy Sell (Managing Director), Ian Mullins (Senior Environmental Scientist) and Alyse Lupardo (Graduate Environmental Scientist) assessing compliance with MS 366 and 703 and associated management plans. While these Ministerial Statements are outside the scope of this CAR, several requirements of the KNRMP were inherently assessed as they relate to land management activities undertaken throughout the project area. KSS were found to be compliant with all conditions that were relevant to MS 916.

An external desktop audit for MS 916 was undertaken for the previous reporting period in February 2023 by MBS Environmental. KSS was found to be compliant with all conditions that were relevant to the status of the Project at the time, as reported in the 2023 CAR.

4.3 MANAGEMENT PLANS

The KNRMP was approved on 12 November 2020, as reported in previous CARs. As such, the status of Condition 12-2 has changed from Compliant to Completed.

KSS was found to have largely implemented all required aspects of the KNRMP during the reporting period, satisfying Condition 12-3 of MS 916. The KNRMP requires KSS to undertake a dieback assessment, inclusive of mapping disease occurrence within Areas 1, 2 and 3, with submission to DWER prior to March 2021. These works are yet to be completed however the timing of these works has been postponed to better align with similar dieback assessment of the approved mining area as required by condition 6-1 of MS 916. The current management measures being employed by KSS for dieback management are considered effective in minimising the risk of increased presence of dieback in Areas 1, 2 and 3. These measures were developed based on the 2002 dieback mapping which designated Areas 1, 2 and 3 as either infected or unprotectable. On this basis no non-compliance for this requirement has been recorded.

No other Management Plans were required by conditions of MS 916 during the reporting period. A number of Management Plans are required to be developed and implemented either prior to ground-disturbing activities or six months after commencement of mining and are not required at this stage.

4.4 MONITORING PROGRAMS

Following approval of the KNRMP, a number of monitoring programs are now required to be undertaken to demonstrate compliance with stated actions and outcomes. Implementation of regular weed, feral animal and fire control programs in Area 2 is required for the duration of the Project. Outcomes of monitoring in this area are required to be reported in the annual CAR for MS 916 (this report) as stipulated in the KNRMP. KSS has continued to undertake weed, feral animal, and fire control within Area 2 during the reporting period.

Vegetation monitoring of Area 3 rehabilitation is required to commence one year after rehabilitation activities have been completed. Only a portion of Area 3 rehabilitation has been completed. KSS are working with Matisse to develop both formal monitoring transects and appropriate analogues for Area 3 and these will be surveyed in future monitoring periods. Once this monitoring work begins, outcomes of rehabilitation monitoring will be reported in the annual CAR for MS 916.

Additional monitoring programs not currently required by MS 916 will be established prior to ground disturbing activities in accordance with MS 916 requirements.

4.5 AUDIT TABLES

Compliance requirements are detailed in the MS 916 Audit Table in Appendix 1.

Compliance requirements regarding the KNRMP are detailed in the Audit Findings for KNRMP Implementation Table in Appendix 2. As the proposal has substantially commenced, but no ground-disturbing or mining activities have been undertaken, the status of many conditions is 'NR' (Not Required). Conditions previously met are marked as 'Completed' (CLD).

5. NON-COMPLIANCE WITH MINISTERIAL STATEMENT 916

5.1 SUMMARY OF NON-COMPLIANCE

No non-compliances were recorded during the reporting period.

5.2 CORRECTIVE/PREVENTATIVE ACTIONS TAKEN

No corrective/preventative actions were required to be taken during the reporting period.

5.3 RESULTS OF CORRECTIVE/PREVENTATIVE ACTIONS

No corrective/preventative actions were taken during the reporting period.

5.4 FURTHER ACTIONS REQUIRED

Future seed collection to include prior notification of the District Manager Wellington District DBCA at least two weeks in advance.

6. PROPOSED CHANGES TO THE COMPLIANCE ASSESSMENT PLAN

There are no proposed changes to the MS 916 CAP.

7. ACTIVITIES PLANNED FOR NEXT REPORTING PERIOD

KSS will continue to monitor groundwater levels and quality in monitoring bores on the western boundary as required by GWL 60367(4) during the next reporting period (1 January – 31 December 2024) to add to the baseline data. Results of monitoring will be submitted to DWER on an annual basis, together with the results of all other monitoring bores subject of this licence.

Weed, feral animal and fire control in Area 2 of the PKNR will continue to be undertaken during the next reporting period and outcomes of monitoring for these activities as required by the KNRMP will be presented in the 2024 CAR for MS 916.

KSS aims to continue rehabilitation efforts in the next reporting period within Area 3 by reforming the landscape and micro-topography on the eastern slopes. It is anticipated that by creating more rugged and texturised terrain, it will aid in creating more micro-niches for water retention and germination which will provide a more hospitable environment for future revegetation. KSS are working with Mattiske Consulting to develop both formal monitoring transects and appropriate analogues for Area 3 and these will be surveyed in future monitoring periods. Once this monitoring work begins, outcomes of rehabilitation monitoring will be reported in the annual CAR for MS 916.

8. ENDORSEMENT OF COMPLIANCE ASSESSMENT REPORT

I hereby certify that to the best of my knowledge the information contained in this Compliance Assessment Report accurately reflects the status of the Kemerton Silica Sand project against compliance with Ministerial Statement 916.

Name: Kunihiro Takagi

Signed:



Position: Deputy Managing Director

Date: 28 February 2024

DRAFT

APPENDICES

APPENDIX 1: MS 916 AUDIT TABLE

AUDIT TABLE

Proposal Implementation Monitoring Branch

PROJECT: Kemerton Silica Sand, Shire of Harvey

Note:

- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the Minister's Statement for full detail/precise wording of individual elements.
- Code prefixes: M = Minister's condition.
- Abbreviations: CAP = Compliance Assessment Plan; CAR = Compliance Assessment Report; CEO = Chief Executive Officer of OEPA; DWER = Department of Water and Environment Regulation; DBCA = Department of Biodiversity, Conservation and Attractions; EPA = Environmental Protection Authority; Min for Env = Minister for the Environment; OEPA = Office of the Environmental Protection Authority; KSS = Kemerton Silica Sand Pty Ltd; EPP = Environmental Protection Policy; KNR = Kemerton Nature Reserve.
- Compliance Status: C = Compliant, CLD = Completed, NC = Non - Compliant, NR = Not Required at this stage, PNC = Potentially Non-Compliant, IP = In Process. Note - IP may only be used by the proponent in circumstances outlined in Section 2.8 of the *Guidelines for Proponents - Preparing an Audit Table*.
- DWER may seek advice from other agencies or organisations, as required, in order to provide its advice to the Office of the Environmental Protection Authority.

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Advice	Phase	Timeframe	Status	Further Information
916:M1.1	Proposal Implementation	The proponent shall implement the proposal as documented and described in schedule 1 of this statement, subject to the conditions and procedures of this statement.	Project implemented in compliance with these criteria.	Compliance Assessment Report (CAR).	Min for Env		Overall	Ongoing	C	As documented in the CAR 2024.
916:M2.1	Proponent Nomination and Contact Details	The proponent for the time being nominated by the Minister under sections 38(6) or 38(7) of the Act is responsible for the implementation of the proposal.	Information in the CAR.	CAR	Min for Env		Overall	Ongoing	C	No change to proponent.
916:M2.2	Proponent Nomination and Contact Details	The proponent shall notify the CEO of any change of the name and address of the proponent for the serving of notices or other correspondence within 30 days of such change.	Letter notifying CEO of any change in proponent details.	Proponent details correct for the reporting period.	CEO		Overall	Ongoing	C	No change to proponent.
916:M3.1	Time Limit of Authorisation	The authorisation to implement the proposal provided for in this statement shall lapse and be void five years after the date of this statement if the proposal to which this statement relates is not substantially commenced.	Proposal commenced prior to 12 November 2017.	Ground disturbing activities in the extension area. OR Commencement of transfer of land to the Proposed Kemerton Nature Reserve. Letter from KSS to DWER dated 12 December 2017 confirming substantial commencement via completion of land transfer (Condition 12-1). Letter from DWER to KSS dated 30 January 2018 confirming substantial commencement of project.	Min for Env		Overall	On or before 12 November 2018.	CLD	KSS submitted a S46A Application for an extension to Time Limit of Authorisation in July 2017. DWER advised on 5 September 2017 that they will recommend interim extension of 12 months for this condition. KSS agreed to the extension in correspondence dated 7 September 2017. Transfer of land completed on 5 December 2017, and thus the proposal has commenced.
916:M3.2	Time Limit of Authorisation	The proponent shall provide the CEO with written evidence which demonstrates that the proposal has substantially commenced on or before the expiration of five years from the date of this statement.	Letter, together with evidence, notifying CEO that the project has substantially commenced.	Letter notifying CEO that the project has substantially commenced. Letter from KSS to DWER dated 12 December 2017 confirming substantial commencement via completion of land transfer (Condition 12-1).	CEO		Overall	On or before 12 November 2018.	CLD	Transfer of land completed on 5 December 2017 with the issuing of new Certificate of Title to Lot 251 to the Conservation and Land Management Executive Body.

AUDIT TABLE

Proposal Implementation Monitoring Branch

PROJECT: Kemerton Silica Sand, Shire of Harvey

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Advice	Phase	Timeframe	Status	Further Information
916:M4.1	Compliance Reporting	The proponent shall prepare and maintain a compliance assessment plan to the requirements of the CEO.	Prepare a Compliance Assessment Plan (CAP).	Notification of approval of CAP by CEO.	CEO		Overall	Ongoing	CLD	CAP accepted by OEPA on 13/08/13.
916:M4.2	Compliance Reporting	The proponent shall submit to the CEO the compliance assessment plan required by condition 4-1, at least six months prior to the first compliance report required by condition 4-6, or prior to implementation, whichever is sooner.	The Compliance Assessment Plan shall indicate: a. the frequency of compliance reporting; b. the approach and timing of compliance assessments; c. the retention of compliance assessments; d. reporting of potential non-compliances and corrective actions taken; e. the table of contents of compliance reports; and f. public availability of compliance reports.	CAP submitted by 31/08/13.	CEO		Prior to implementation.	On or before 31 August 2013.	CLD	CAP submitted on 22/07/13.
916:M4.3	Compliance Reporting	The proponent shall assess compliance with conditions in accordance with the compliance assessment plan required by condition 4-1.	Undertake compliance assessments as detailed in the CAP.	CAR	CEO		Overall	Ongoing	C	2024 CAR submitted.
916: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.	All compliance assessments retained in hardcopy and electronic formats.	Reports available on request.	CEO		Overall	Ongoing	C	
916:M4.5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within seven days of that non-compliance being known.	The Deputy Managing Director shall advise the CEO in writing of any potential non-compliance within seven days of that incident being known.	Email or letter to CEO dated within seven days of identification of the incident.	CEO		Overall	Within seven days.	C	No non-compliances have occurred.
916:M4.6	Compliance Reporting	The proponent shall submit to the CEO the first compliance assessment report fifteen months from the date of issue of this Statement addressing the twelve month period from the date of issue of this statement and then annually from the date of submission of the first compliance assessment report.	The Compliance Assessment Report shall: a. be endorsed by the proponent's Managing Director or a person delegated to sign on the Managing Director's behalf; b. include a statement as to whether the proponent has complied with the conditions; c. identify all potential non-compliances and describe corrective and preventative actions taken; d. be made publicly available in accordance with the approved compliance assessment plan; e. indicate any proposed changes to the compliance assessment plan required by condition 4-1.	CAR submitted.	CEO		Overall	Annually, by 28 February each year.	C	2024 CAR submitted.

AUDIT TABLE

Proposal Implementation Monitoring Branch

PROJECT: Kemerton Silica Sand, Shire of Harvey

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Advice	Phase	Timeframe	Status	Further Information
916: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) relevant to the assessment of this proposal and implementation of this statement.	Make all validated environmental data publicly available within a reasonable time period.	Public availability of all validated environmental data.	CEO		Overall	A reasonable time period approved by the CEO, for the remainder of the life of the proposal.	C	As operational works are yet to commence, no environmental surveys and subsequent data have been conducted.
916:M5.2	Public Availability of Data	If any data referred to in condition 5-1 contains particulars of: 1. a secret formula or process; or 2. confidential commercially sensitive information; the proponent may submit a request, for approval from the CEO, to not make this 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.	Letter to CEO requesting not to make sensitive data publicly available.	Letter to CEO.	CEO		Overall	Reasonable time period from the issue of this statement.	C	As operational works are yet to commence, no environmental surveys and subsequent data have been conducted.
916:M6.1	Dieback Control and Monitoring	Prior to undertaking ground-disturbing activities for the proposal, the proponent shall prepare a map (using geo-spatial co-ordinates) showing the occurrence of dieback infestation on land within the project area, proponent-owned land bordering the mining expansion area, and on reference sites.	Investigate the project area, proponent owned land bordering the mine expansion and on reference sites to determine dieback infestation.	Map showing dieback status of land. Report documenting processes used to determine dieback status.	CEO		Prior to ground disturbance.	Prior to ground-disturbing activities.	NR	Small resource definition drilling program conducted in 2022 did not constitute ground disturbance for the purpose of MS 916. Raised blade clearing conducted to form short term tracks for drill rig and light vehicle access. Existing dieback management measures, as conditioned by MS 366 and MS 703 were implemented during land management and drilling activities in the proposal area. No ground disturbing activities during the reporting period.
916:M6.2	Dieback Control and Monitoring	The proponent shall submit the map required by condition 6-1 to the CEO.	Prepare dieback map and submit to CEO.	Map submitted.	CEO		Prior to ground disturbance.	Prior to ground-disturbing activities.	NR	As per Condition 6.1
916:M6.3	Dieback Control and Monitoring	The proponent shall develop a Dieback Management Plan derived from the mapping required by condition 6-1. The objective of the Dieback Management Plan is to ensure that <i>Phytophthora</i> dieback disease is not introduced or spread into uninfected areas. The Dieback Management Plan shall be prepared, in consultation with DBCA, and approved by the CEO.	Prepare a Dieback Management Plan.	Approved Dieback Management Plan.	CEO	DBCA	Prior to ground disturbance.	Prior to commencement of operations	NR	As per Condition 6.1
916:M6.4	Dieback Control and Monitoring	The Dieback Management Plan shall include, but not be limited to: 1. Hygiene management measures to prevent the introduction of dieback disease; 2. Procedures for limiting and authorising access to areas that are dieback infected; and	Prepare Dieback Management Plan as outlined.	Dieback Management Plan contains required information.	CEO		Prior to ground disturbance.	Prior to commencement of operations	NR	As per Condition 6.1

AUDIT TABLE

Proposal Implementation Monitoring Branch

PROJECT: Kemerton Silica Sand, Shire of Harvey

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Advice	Phase	Timeframe	Status	Further Information
		3. Control measures should dieback be detected in previously uninfected areas.								
916:M6.5	Dieback Control and Monitoring	The proponent shall implement the Dieback Management Plan required by condition 6-3 during the ongoing operation of the proposal.	Implement the Dieback Management Plan.	Hygiene measures, restricted access and control measures are being implemented.	Min for Env		Operation	Ongoing	NR	As per Condition 6.1. Operations are yet to commence.
916:M6.6	Dieback Control and Monitoring	The proponent shall review bi-annually the approved Dieback Management Plan required by condition 6-3 and report the results in the compliance assessment report required by condition 4-6.	Dieback Management Plan reviewed bi-annually and results reported in Compliance Assessment Report.	Dieback Management Plan contains review history. Results in CAR.	Min for Env		Operation	Ongoing	NR	As per Condition 6.1. Operations are yet to commence.
916:M7.1	Weed Control and Monitoring	The proponent shall ensure that no new species of declared weeds and environmental weeds ¹ establish in proponent-owned land as a result of the implementation of the proposal.	Weed monitoring. Check BAM Act 2007 regarding declared pests and environmental weeds.	Pre & post expansion commencement weed monitoring within proponent owned land shows no new species of weeds resultant from proposal.	Min for Env		Overall	Ongoing	C	Operations yet to commence. Weed monitoring will continue in areas of land disturbance in conjunction with MS 366 and MS 703 conditions.
916:M7.2	Weed Control and Monitoring	Prior to undertaking ground-disturbing activities for the proposal, the proponent shall undertake a baseline weed survey to determine the extent of declared weeds, environmental weeds and potential environmental weeds on land within the project area, proponent-owned land bordering the mining expansion area. The proponent shall establish three reference sites in consultation with the DEC (now DBCA). The reference sites shall be monitored annually for two years following ground-disturbing activities and subsequently every two years for the life of the proposal to determine whether changes in weed cover and type have occurred and are project-attributable, or are a part of broader regional changes.	Develop a weed survey schedule to assist weed management and timing. Conduct a baseline weed survey on land within the project area, proponent-owned land bordering the mining expansion area. Establish three reference sites for monitoring.	Baseline Survey Report. Reference sites established. Consultation with DBCA regarding reference sites. Monitoring program implemented for each area following ground-disturbing activities.	DBCA	DWER	Prior to ground disturbance.	Prior to ground-disturbing activities conduct baseline survey. Reference sites monitored annually for two years following ground disturbance, then biennially.	NR	Small resource definition drilling program conducted in 2022 did not constitute ground disturbance for the purpose of MS 916. Raised blade clearing conducted to form short term tracks for drill rig and light vehicle access. Existing weed management measures, as conditioned by MS 366 and MS 703 were implemented during land management and drilling activities in the proposal area. No ground disturbing activities during the reporting period.
916:M7.3	Weed Control and Monitoring	Prior to undertaking ground-disturbing activities for the proposal, the proponent shall submit a Weeds Eradication Program based on the survey required by condition 7-2 for approval of the CEO.	Develop a Weeds Eradication Program.	Approved Weeds Eradication Program.	CEO		Prior to ground disturbance.	Prior to ground-disturbing activities.	NR	As per Condition 7.2.
916:M7.4	Weed Control and Monitoring	The proponent shall implement the Weeds Eradication Program referred to in condition 7-3.	Implement the Weeds Eradication Program.	Weeds Eradication Program measures implemented as documented in the Plan. Implementation to be checked as part of annual internal audit.	CEO		Overall	Ongoing	NR	As per Condition 7.2.
916:M7.5	Weed Control and Monitoring	The proportional cover of weeds (including both declared weeds and environmental weeds) within the proposal area shall not exceed that concurrently existing on reference sites determined in accordance with condition 7-2.	Implement the Weeds Eradication Program.	Weed reports undertaken and include comparison of cover from year to year.	CEO		Overall	Ongoing	NR	As per Condition 7.2.

¹ environmental weeds are plants other than Declared Agricultural Weeds which are not native to the local area.

AUDIT TABLE

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Audit Code	Subject	Requirement	How	Evidence	Satisfy	Advice	Phase	Timeframe	Status	Further Information
916:M7.6	Weed Control and Monitoring	In the event that there are locations where condition 7-5 has not been met, the proponent shall develop remedial measures and shall implement those remedial measures to the requirements of the CEO.	Develop and implement remedial measures.	Weed report identifies areas of non-compliance and proposed eradication actions. Implementation of eradication actions (scope of works, invoices, timesheets).	CEO		Operation	If the proportional cover of weeds exceeds that on reference sites and is attributable to project activities.	NR	As per Condition 7.2. Operations are yet to commence.
916:M7.7	Weed Control and Monitoring	The proponent shall review bi-annually the approved Weeds Eradication Program required by condition 7-2 and report the results in the compliance assessment report required by condition 4-6.	Review Weeds Eradication Program and report results in Compliance Assessment Report.	Weeds Eradication Program contains review history. Results in CAR.	CEO		Operation	Bi-annually and report annually	NR	As per Condition 7.2. Operations are yet to commence.
916:M8.1	Fauna	Prior to undertaking ground-disturbing activities for the proposal the proponent shall submit for approval of the CEO a strategy to identify and protect Black-striped Jollytail fish habitat wetlands and populations.	Prepare strategy to protect Black-striped Jollytail fish habitat wetlands and submit to the CEO.	Strategy submitted and approved by CEO.	CEO		Prior to ground disturbance.	Prior to ground-disturbing activities.	NR	Small resource definition drilling program conducted in 2022 did not constitute ground disturbance for the purpose of MS 916. Raised blade clearing conducted to form short term tracks for drill rig and light vehicle access. Existing land management measures relating to protection of fauna and wetland habitats, as conditioned by MS 366 and MS 703 were implemented during land management and drilling activities in the proposal area.
916:M8.2	Fauna	To verify that the requirements of condition 8-1 are met, the proponent shall, prior to commencement of dredging and thereafter bi-annually, carry out a survey in natural wetlands adjacent to the proposed dredge ponds to monitor for the incidence of <i>Gambusia holbrooki</i> .	Survey natural wetlands adjacent to dredge pond for the incidence of <i>Gambusia holbrooki</i> .	Monitoring program report for <i>Gambusia holbrooki</i> .	CEO		Operation	Prior to the commencement of dredging and then bi-annually.	NR	As per Condition 8.1. Dredging operations not yet commenced in proposal area.
916:M8.3	Fauna	The proponent shall submit the results of the surveys required by condition 8-2 to the CEO within 21 days of the survey being completed.	Submit the wetland survey results to the CEO	Submission of wetland survey results to CEO. Date of report submission less than 21 days after completion of survey.	CEO		Operation	Within 21 days of survey being completed.	NR	As per Condition 8.1. Dredging operations not yet commenced in proposal area.
916:M8.4	Fauna	In the event that surveys required by condition 8-2 indicate the presence of <i>Gambusia holbrooki</i> in natural wetlands adjacent to dredge ponds the proponent shall: 1. report such findings to the CEO within 21 days; 2. provide evidence to allow determination of the cause of the incidence of <i>Gambusia holbrooki</i> in natural wetlands adjacent to dredge ponds; 3. if determined by the CEO to be a result of activities undertaken in implementing the proposal the proponent shall, within 21 days of the determination	Provide evidence to determine cause of <i>Gambusia holbrooki</i> in natural wetlands, and when directed by CEO submit actions to remove the population. Implement actions to remove population of <i>Gambusia holbrooki</i> .	Survey report. Letter to CEO within 21 days of survey report. Investigation Report. Remedial Action Plan within 21 days of determination being made to the CEO. Implementation evidence (scope of works, invoices, timesheets).	CEO		Operation	If survey indicates presence of <i>Gambusia holbrooki</i> in natural wetlands and when directed by the CEO.	NR	As per Condition 8.1. Dredging operations not yet commenced in proposal area and thus monitoring is not required at this time.

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Audit Code	Subject	Requirement	How	Evidence	Satisfy	Advice	Phase	Timeframe	Status	Further Information
		being made to the CEO, submit actions to be taken to remove the population of <i>Gambusia holbrooki</i> in natural wetlands adjacent to dredge ponds; and 4. implement actions to remove the population of <i>Gambusia holbrooki</i> in natural wetlands adjacent to dredge ponds to the requirements of the CEO.								
916:M8.5	Fauna	The proponent shall submit monitoring results required by condition 8-2 as part of its annual compliance assessment report required by condition 4-6.	Include <i>Gambusia holbrooki</i> in natural wetlands monitoring results in Compliance Assessment Report.	Monitoring results included in CAR.	CEO		Operation	Annual	NR	As per Condition 8.1. Dredging operations not yet commenced in proposal area and thus monitoring is not required at this time.
916:M9.1	Wetlands Water Level and Ecosystem Function	The proponent shall ensure that water levels necessary to maintain the pre ground-disturbance ecological regime are not adversely affected by the mining activities.	Measure wetland water levels in wetlands 4 and 8 according to the proposal approved in M9.2.	Water monitoring results. Results of wetlands 4 and 8 monitoring program.	CEO		Operation	Ongoing	NR	Operations have not yet commenced.
916:M9.2	Wetlands Water Level and Ecosystem Function	To ensure condition 9-1 is met, the proponent shall, prior to undertaking ground-disturbing activities for the proposal, submit for approval of the CEO a proposal to determine the ecological water level requirements to maintain the ecological water regime of <i>Environmental Protection (Swan Coastal Plain Lakes) Policy 1992</i> wetlands 4 and 8.	Prepare and submit a proposal to determine and maintain the ecological water level regime of EPP wetlands 4 and 8.	Approval of Ecological Water Level Regime proposal by CEO.	CEO		Prior to ground disturbance.	Prior to ground-disturbing activities.	NR	Small resource definition drilling program conducted in 2022 did not constitute ground disturbance for the purpose of MS 916. Raised blade clearing conducted to form short term tracks for drill rig and light vehicle access. Existing land management measures relating to protection of wetland ecosystems, as conditioned by MS 366 and MS 703 were implemented during land management and drilling activities in the proposal area.
916:M9.3	Wetlands Water Level and Ecosystem Function	The proponent shall ensure that the water level regimes in <i>Environmental Protection (Swan Coastal Plain Lakes) Policy 1992</i> wetlands 4 and 8 are maintained consistent with pre-mining levels.	Maintain water level regimes in EPP wetlands 4 and 8 similar to pre-mining levels.	Results of EPP Wetlands 4 and 8 monitoring program.	CEO		Operation	Ongoing	NR	As per Condition 9.2 Operations have not yet commenced.
916:M9.4	Wetlands Water Level and Ecosystem Function	The proponent shall monitor the water levels in <i>Environmental Protection (Swan Coastal Plain Lakes) Policy 1992</i> wetlands 4 and 8 at quarterly intervals beginning prior to commencement of clearing for the proposal and continuing for up to five years following the completion of mining and disposal activities.	Quarterly monitoring of EPP wetlands 4 and 8.	Quarterly monitoring results of EPP wetlands 4 and 8. Monitoring data consistent with required timeframes.	CEO		Overall and post closure, up to 5 years following decommissioning	Quarterly. Beginning prior to commencement of clearing and ongoing for up to five years following the completion of mining activities.	NR	As per Condition 9.2 Operations have not yet commenced.
916:M9.5	Wetlands Water Level and Ecosystem Function	In the event that monitoring required by condition 9-4 indicates significant adverse fluctuations in water level regimes inconsistent with pre-mining levels in <i>Environmental Protection (Swan Coastal Plain Lakes) Policy 1992</i> wetlands 4 and 8:	Report adverse fluctuations in wetlands 4 and 8 to the CEO. Provide evidence which allows the determination of the cause of decline.	Analysis of quarterly monitoring results of EPP wetlands 4 and 8. Letter notifying CEO. Investigation Report.	CEO		Overall and post closure, up to 5 years following decommissioning	Within 21 days of identifying monitoring showing decline in water regime.	NR	As per Condition 9.2 Operations have not yet commenced and thus monitoring is yet to occur.

AUDIT TABLE

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Audit Code	Subject	Requirement	How	Evidence	Satisfy	Advice	Phase	Timeframe	Status	Further Information
		1. The proponent shall report such findings to the CEO within 21 days of the decline being identified; 2. The proponent shall provide evidence which allows determination of the cause of the decline; 3. If determined by the CEO to be a result of activities undertaken in implementing the proposal the proponent shall submit actions to be taken to remediate any significant deterioration in wetland ecosystem function and/or environmental values within 21 days.	When directed by CEO submit actions to remediate any significant deterioration in wetland ecosystem function.	Remedial Action Plan.				When directed by the CEO.		
916:M9.6	Wetlands Water Level and Ecosystem Function	The proponent shall implement remedial actions required by condition 9-5 as necessary to allow the pre-existing wetland water regime and wetland ecosystem function to re-establish to the satisfaction of the CEO.	Implement remedial actions to re-establish ecosystem function to the satisfaction of the CEO	Implementation evidence (scope of works, invoices, timesheets).	CEO		Overall and post closure, up to 5 years following decommissioning	As necessary	NR	As per Condition 9.2 Operations have not yet commenced and thus monitoring is yet to occur.
916:M9.7	Wetlands Water Level and Ecosystem Function	The proponent shall submit monitoring results required by condition 9-4 as part of its annual compliance assessment report required by condition 4-6.	Monitoring results of EPP wetlands 4 and 8 are included in Compliance Assessment Report.	Monitoring results of EPP wetlands 4 and 8 included in CAR.	CEO		Overall	Annual	NR	As per Condition 9.2 Operations have not yet commenced and thus monitoring is yet to occur.
916:M10.1	Acid or Metalliferous Drainage	Prior to mining of areas in the extension proposal, the proponent shall develop and submit to the satisfaction of the CEO: 1. A plan showing the distribution of actual & potential acid sulphate soils, including sub-surface deposits, in areas to be mined; and 2. Long-term prevention, monitoring, contingency & remediation strategies for management of any potential acid or metalliferous drainage.	Prepare Acid Sulphate Soils Management Plan as outlined and submit to CEO.	Approval letter from CEO.	CEO		Prior to mining the areas in the extension proposal	Prior to the mining of areas in the extension proposal.	NR	Small resource definition drilling program conducted in 2022 did constitute ground disturbance for the purpose of MS 916. Raised blade clearing conducted to form short term tracks for drill rig and light vehicle access. Acid sulphate soil samples were collected during the drilling program. Analytical results from sampling suggest that the risk of ASS towards the bottom of the proposed resource drilling is low however sampling higher in the profile is required to assess overall ASS risk. These studies are currently being planned. Mining operations have not yet commenced.
916:M10.2	Acid or Metalliferous Drainage	The proponent shall report on the outcomes of the long-term prevention, monitoring, contingency and remediation strategies required by condition 10-1 as part of the compliance assessment report required by condition 4-6.	Report on the outcomes of the Acid Sulphate Soils Management Plan.	Outcomes of the Acid Sulphate Soils Management Plan are in the CAR.	CEO		Overall	Annual	NR	As per Condition 10.2. Mining operations in the proposal area are yet to occur.

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Audit Code	Subject	Requirement	How	Evidence	Satisfy	Advice	Phase	Timeframe	Status	Further Information
916:M11.1	Mine Rehabilitation and Closure	Prior to mining of areas in the extension proposal, the proponent shall submit a Mine Rehabilitation and Closure Plan (including scaled plans for progressive rehabilitation fully defined by spatial data) for approval by the CEO. The Mine Rehabilitation and Closure Plan shall be prepared in accordance with the Environmental Protection Authority and Department of Mines and Petroleum <i>Guidelines for Preparing Mine Closure Plans</i> (June 2011) or subsequent revisions, and shall include the results of baseline vegetation surveys of areas to be disturbed by the proposal; the proposed final land use(s); closure objectives; and completion criteria.	Prepare and submit a Mine Rehabilitation and Closure Plan in accordance with the <i>Guidelines for Preparing Mine Closure Plans</i> (June 2011) or subsequent revisions. Include in the Plan results of baseline vegetation surveys of areas disturbed by the proposal, proposed final land uses, closure objectives and completion criteria.	Approved Mine Rehabilitation and Closure Plan.	CEO		Prior to mining areas in the extension.	Prior to mining areas in the extension.	NR	Mining operations in the proposal area are yet to occur.
916:M11.2	Mine Rehabilitation and Closure	The proponent shall implement the proposal so that the mine can be progressively rehabilitated and closed to ensure that: 1. All landforms (including ore and reject sand stockpiles, dredge ponds and areas of infrastructure) are left in a safe, non-polluting and stable condition; 2. The margins of dredge ponds are shelved to ensure human safety and to provide shallow-water habitat suitable for native water plants and native fauna; 3. The ponds to be left after mining shall not become anaerobic, polluted or contaminated, shall not have adverse impacts on groundwater quality and shall provide suitable habitat for native aquatic fauna and vegetation; 4. All other areas are vegetated with living, self-sustaining native vegetation of local provenance which stabilises local landforms and provides suitable habitat for native fauna.	Implement the Mine Rehabilitation and Closure Plan.	Implementation evidence (such as scope of works, invoices, timesheets, photographs, survey reports, water quality results, fauna monitoring reports).	CEO		Operation	During operation and after mining is completed in extension area.	NR	Mining operations in the proposal area are yet to occur.
916:M11.3	Mine Rehabilitation and Closure	The percentage cover and species diversity of living self-sustaining native vegetation in all rehabilitation areas shall be comparable to that of undisturbed natural analogue sites ^{2*} as determined by botanical surveys carried out in accordance with Environmental Protection Authority Guidance Statement Number 51 (or subsequent updates) or other methodology acceptable to the CEO.	Conduct botanical surveys to compare undisturbed natural analogue sites to rehabilitation using method acceptable to the CEO. Botanical surveys carried out in accordance with EPA Guidance Statement Number 51 (or subsequent updates) or other acceptable method.	Results of botanical surveys using a methodology acceptable to the CEO.	CEO		Operation to post decommissioning	Operation to post decommissioning	NR	Mining operations in the proposal area are yet to occur.
916:M11.4	Mine Rehabilitation and Closure	Every three years the proponent shall review and revise the approved Mine Rehabilitation and Closure Plan required by condition 11-1 to the satisfaction of the CEO.	Review and revise the Mine Rehabilitation and Closure Plan and gain satisfaction from the CEO.	Mine Rehabilitation and Closure Plan contains review history and is satisfactory to the CEO.	CEO		Operation	Triennial	NR	Mining operations in the proposal area are yet to occur.

² natural analogue sites shall be selected to the requirements of the CEO on advice of the DEC

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Audit Code	Subject	Requirement	How	Evidence	Satisfy	Advice	Phase	Timeframe	Status	Further Information
916:M11.5	Mine Rehabilitation and Closure	The proponent shall implement the most recently approved Mine Rehabilitation and Closure Plan until the CEO agrees in writing that implementation may cease.	Implement the approved Mine Rehabilitation and Closure Plan.	Implementation evidence (such as scopes of work, invoices, timesheets, photographs, monitoring reports). Letter from CEO.	CEO		Operation to post decommissioning	Ongoing until CEO agrees in writing that implementation may cease.	NR	Mining operations in the proposal area are yet to occur.
916:M12.1	Residual Impacts and Risk Management Measures	Given the significant residual impacts and risks (permanent and temporary) of the proposal on conservation significant wetlands, and fauna and flora species in the environment surrounding the proposal, the proponent shall, within 12 months of undertaking ground-disturbing activities for the proposal, transfer proponent-owned land totalling 845.1 hectares, being Lot 501 and portion of Lot 32, to the State of Western Australia for addition into the conservation reserve system. The relevant certificates of title shall contain a notation to the effect that the DBCA is the agency responsible for the land.	Transfer proponent-owned land totalling 845.1 hectares to the State of Western Australia for addition into the conservation reserve system.	Written notice of application for transfer of land is made within 12 months of ground disturbance commencing. Land Survey report. Certificates of title issued 5 December 2017. Formal acceptance of land transfer received from DWER on 30 January 2018.	CEO		Within 12 months of undertaking ground-disturbing activities for the proposal.	Within 12 months of undertaking ground-disturbing activities for the proposal.	CLD	
916:M12.2	Residual Impacts and Risk Management Measures	Within six months of satisfying the requirements of condition 12-1, the proponent in consultation with the DBCA shall submit a management plan for the proposed Kemerton Nature Reserve & the land to be transferred to the State of Western Australia as described in condition 12-1, to the satisfaction of the CEO. The management plan shall specify the nature, timing and duration of the ongoing management activities to be undertaken by the proponent & the DBCA (that may include, but not be limited to, fencing & access management, weed control, dieback management, introduced fauna control, fire management & recreational uses) & the methodology, completion criteria, & timing for rehabilitation of the degraded area of Bassendean woodland within the proposed Kemerton Nature Reserve being that portion of the proposed Kemerton Nature Reserve delineated on the plan set out in Figure 2 to this statement.	Prepare and submit a Management Plan for the Proposed Kemerton Nature Reserve (MPPKNR) to the satisfaction of the CEO. Prepare Management Plan as outlined.	Plan contains specified information. Evidence of consultation with DBCA (letters, emails, meeting minutes, file notes). Evidence of plan submission to CEO within 6 months of land transfer being completed. Letter from KSS to DWER dated 26 July 2018 with explanation of consultation with DBCA re Kemerton Nature Reserve Management Plan (KNRMP) and copy of KNRMP enclosed. Email received from R. Inglis dated 21 August 2018 confirming DWER receipt of KNRMP. Meeting with KSS and DWER representatives on December 11 2019 regarding the revised MPPKNR to discuss the scope and expectations. Email correspondence with DWER following the December meeting to clarify scope and expectations for the revised MPPKNR.	CEO	DBCA DWER	Operation	Within six months of satisfying the requirements of condition 12-1. Extension approved for submission of MPPKNR revision 1 on 28/01/2020 (subsequently updated to 7 February 2020 as approved in January 2020).	CLD	The KNRMP was approved on 2 November 2020.

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Audit Code	Subject	Requirement	How	Evidence	Satisfy	Advice	Phase	Timeframe	Status	Further Information
				Revised MPPKNR to include changes as per DWER and DBCA advice.						
916:M12.3	Residual Impacts and Risk Management Measures	The proponent and the DBCA shall implement the management plan approved under condition 12-2 in consultation with the DBCA and the Local Government.	Implement the approved Management Plan for the Proposed Kemerton Nature Reserve.	Implementation evidence (e.g. scopes of work, invoices, timesheets, photos, monitoring reports). Evidence of consultation (letters, emails, meeting minutes, file notes).	DBCA Shire of Harvey		Operation	Ongoing	C	Following consultation with DBCA, it is understood that all land management actions, targets and reporting requirements established in the KNRMP apply solely to Area 2 (as defined in the KNRMP). Methodology for rehabilitation as well as completion criteria and timing requirements outlined in the KNRMP apply to Area 3 (as defined in the MPPKNR). KSS were found to be largely compliant with applicable requirements of the KNRMP and appropriately implemented land management and rehabilitation actions as required.
916:M12.4	Residual Impacts and Risk Management Measures	Within 12 months of undertaking ground-disturbing activities for the proposal, the proponent shall provide funding in the amount of seventy two thousand dollars (\$72,000) to a research project acceptable to the CEO to undertake research on: 1. The ecological requirements and population genetics of remnant Black-striped Jollytail populations in seasonal wetlands of South-western Australia; and 2. Macro-invertebrates in wetlands to establish baseline conditions as analogues for future rehabilitation.	Provide \$72,000 to a research project acceptable to the CEO on: 1. The ecological requirements of remnant Black-striped Jollytail in wetlands; and 2. Macro-invertebrates in wetlands.	Scope of Works for Research Project. Evidence of funding provision. Final Reports supplied to DWER in correspondence related to the 2018 CAR. DWER confirmed condition 12-4 is met in correspondence dated 13 April 2018.	CEO		Within 12 months of undertaking ground-disturbing activities for the proposal.	Within 12 months of undertaking ground-disturbing activities for the proposal.	CLD	

APPENDIX 2: AUDIT FINDINGS FOR KNRMP IMPLEMENTATION

Table A3-1: Audit Findings for KNRMP Implementation

EMP Reference	Issue	Plan Requirements	2023/2024 Compliance Status	Further Information/Evidence
5.1.3	Mining Rehabilitation Support	Collection of seeds from Areas 1 and 2 only to occur when insufficient seed is available from sources within the KSS project area.	C	Seed collected from Area 2 during the reporting period.
		No collection of seed to occur within Area 3 (Lot 250).	C	No seed collection has occurred within Area 3 during the reporting period.
		Develop and comply with a Seed Collection Protocol, agreed between KSS and DBCA, including circumstances for seed collection within the PKNR, a seed collection checklist and seed collection procedures within Areas 1 and 2.	C	Seed Collection Protocol developed alongside KNRMP, approved 12 November 2020. No seed collection occurred within areas applicable to the KNRMP requirements.
		Staff to be trained in seed collection procedures and checklist.	C	Rehabilitation Officer trained in procedure and checklist.
		Notification of District Manager Wellington District DBCA at least two weeks in advance of seed harvesting activities.	C	KSS have valid permits issued by DBCA for seed collection (Regulation 4 and Regulation 61 permits). In obtaining the licences KSS consulted with DBCA on where seed collection was permitted throughout the KNR. Although the audit noted that no notification to DBCA happened strictly in line the KNRMP, the consultation which occurred as part of the licences is considered adequate and therefore KSS are considered compliant under the KNRMP. KSS will also include additional notification to DBCA for future seed collection activities.
5.2.3	Fire Management	Firebreaks and tracks installed and maintained annually around the external perimeter of Area 1 prior to summer.	C	Annual firebreak maintenance conducted in November 2023.
		KSS personnel trained in use of fire extinguishers.	C	All full-time personnel have been trained in fire management and training records are still current.
		Assessment and management of fuel loads around the perimeter and within bush areas of Area 2 annually prior to summer.	C	Fuel loads were visually inspected during November 2023. Additional management was not required.
		Vehicle with mounted tank present on site.	C	Fire response trailer present on site to increase availability of system in emergency fire situations. Sited September 2023 during site inspection.
		District Manager Wellington District DBCA to be contacted to request prescribed burning, no prescribed burning conducted within Area 2.	C	No prescribed burns conducted within Area 2, KSS owned land or other land transfer areas during the reporting period.
		In the case of excessive fuel loading, fuel reduction via mowing or slashing is required, and records are to be maintained.	C	No excessive fuel loads were observed during fuel load assessment and management during the reporting period.
5.3.3	Introduced Species	No unauthorised access to Area 2 by KSS employees or contractors.	C	Access within Area 2 restricted to land management activities during the reporting period. Inductions include information regarding unauthorised access areas. "Keep Out" signs are in place and both fences and gates are checked and maintained.
		Area 2 perimeter fencing checked annually, and maintenance conducted as required.	C	KSS have continued to check perimeter fences during the reporting period. Maintenance conducted when breaches observed.
		Annual inspection and monitoring of weeds within Areas 2 and 3 with records kept.	C	Weed inspections are carried out and weed management records observed for both KSS Project areas and Area 2 and 3. Records of weed sightings kept (annual weed location map). Records sighted of manual and chemical weed control conducted during the reporting period. Weed locations updated regularly and consolidated in an annual weed location map. Summer and winter weed management program implemented. Logs and maps sighted in September 2023.
		Biannual weed control program implemented for Areas 2 and 3 with records kept.	C	Both chemical and physical weed control undertaken across KSS activities and Area's 2 and 3 during the reporting period.
		Annual monitoring for evidence of feral animals within Areas 2 and 3 with records kept.	C	Feral animal control conducted within KSS project area and Area's 2 & 3 as sighted in September 2023. Feral animal management procedure available upon request.
		Access to conduct Area 2 land management activities restricted to dry periods.	C	Access was restricted to dry periods in line with KSS owned land requirements
		Works are to be scheduled in weed free areas prior to proceeding to areas of weed infestation.	C	Scheduling completed in line with KSS owned land requirements.
		Soil and plant materials brought onsite are to be certified weed free.	C	Accredited nursery utilises species locally occurring within native vegetation of the site. No seed or soil materials brought to site during the reporting period.
		All contractor equipment is to be cleaned on departure from contractor depot and verified on arrival at the KSS office.	C	All mobile equipment inspected upon arrival to site. Records sighted September 2023. In the case of inadequate cleanliness, equipment is cleaned utilising operational washdown bay at entrance to KSS operations.
		All KSS equipment is to be washed clean of mud and soil prior to leaving from and arriving at KSS sites.	C	All mobile equipment inspected upon arrival to site. Records sighted September 2023. In the case of inadequate cleanliness, equipment is cleaned utilising operational washdown bay at entrance to KSS operations.
		An operational washdown point is to be located at KSS entry	C	Operational washdown bay sighted at KSS entry in September 2023.
		Vehicle access restricted to established tracks, except for purposes of land management practices.	C	Vehicle access restricted to existing tracks to minimise disturbance. No unauthorised KSS or contractor vehicle access noted during the reporting period. One incident reported of unauthorised public access to Area 2, along existing track.
		Annual maintenance of fences surrounding Area 2 to be conducted.	C	KSS have continued to check and maintain perimeter fences during the reporting period. Repairs conducted as required.
All land management actions, control measures and outcomes to have records kept.	C	Records of land management, control measures and outcomes kept.		

EMP Reference	Issue	Plan Requirements	2023/2024 Compliance Status	Further Information/Evidence
5.4.3	Phytophthora Dieback	Dieback assessment completed by accredited dieback assessor and results provided to DBCA prior to March 2021.	PNC	Dieback assessment yet to occur. These works will be scheduled to align with the assessment required by MS 916 Condition 6-1.
		'Clean on entry' points operational, marked on dieback maps, and records of usage kept.	C	Operational washdown bay utilised on entry to KSS operations. Existing dieback procedures and protocols for operational areas are used and applied to Areas 2 and 3.
		Soil or plants imported to site are to be certified dieback free.	C	No seed or soil materials brought to site during the reporting period. Tubestock infill planting in Area 1 and 2 during the reporting period. Accredited nursery utilises seed sourced from site for propagation (Boyanup Botanical: https://boyanupbotanical.com.au/). Certificate sighted September 2023.
		Dieback resistant species are to be used for rehabilitation.	C	No strict policy for species selection although dieback resistant species were prioritised for small scale tubestock planting undertaken in the reporting period.
		All soil disturbing works are carried out during dry weather.	C	No soil disturbance conducted during the reporting period.
		A 'Protectable Areas Map' is to be developed within 2 months of assessment.	PNC	Dieback assessment yet to occur. This will be scheduled to align with the assessment required by MS 916 Condition 6-1. Results of previous dieback assessment indicates no areas are likely to be classified as protectable given the low lying nature of the land and presence of damplands and wetlands.
		At least one operational personnel to have Green Card training by 30 June 2020.	C	Environmental Officer holds current Green Card training.
		Where works are conducted by a contractor, all equipment is to be cleaned on departure from the contractor depot and verified on arrival.	C	All mobile equipment inspected upon arrival to site. Records sighted in September 2023. In the case of inadequate cleanliness, equipment is cleaned utilising operational washdown bay at entrance to KSS operations.
		All KSS equipment used is to be cleaned of mud and soil prior leaving from, and on return to, the KSS site.	C	All mobile equipment inspected upon arrival to site. Records sighted in September 2023. In the case of inadequate cleanliness, equipment is cleaned utilising operational washdown bay at entrance to KSS operations,
		Disturbance is limited to the minimum required to effectively undertake land management practices.	C	Disturbance restricted to weed, feral animal and fire management activities within PKNR and Area 1.
		Vehicle access restricted to established tracks, except for management Area 3.	C	Access into land transfer areas restricted to existing tracks during conditionally required management activities. Access into Area 3 restricted to rehabilitation and auditing activities.
		Annual maintenance of fences is to be conducted around Area 1.	C	Annual maintenance of perimeter fences conducted during the reporting period.
		Works are to be scheduled in uninfested sites prior to accessing infested sites.	C	Works in PKNR limited to land management and small scale rehabilitation in Area 3. Dieback protocols for operational areas followed for works in PKNR. Works not undertaken in wet soil conditions.
		New occurrences and risks of dieback to be communicated to KSS staff.	C	Daily shift change, toolbox meetings and incident reports are used to communicate environmental issues or management measures.
Dieback management must be included in KSS site induction and staff are to be adequately trained.	C	All personnel and contractors to site undergo a site induction which includes information regarding Dieback management. Both the Site Induction and Site Induction Questionnaire were sighted in September 2023.		
5.5.3	Recreation and Visitor Access	Records of annual and opportunistic inspection and maintenance of Area 2 perimeter fencing will be kept.	C	Maintenance of perimeter fencing recorded. Eight reported incidents of unauthorised access to Area 2 during the reporting period. Several separate incidents of human and dog footprints being observed along the tracks within the area (suspected pig hunters). Several separate incidents involving motorbikes traveling along KSS tracks and through wetlands on the eastern, northern and western boundaries.
		No signage will be posted regarding the PKNR at main road entry points to reduce potential visitors to the area.	C	No signage regarding the PKNR on display.
5.6.3	Mining Impact	KSS will comply with the requirements of the current Kemerton Silica Sand Wetland Management and Monitoring Plan (WMMP).	C	KSS were found to be in compliance with the KSS WMMP during the reporting period, as reported in the 2023 CAR for MS 366/703 and audited for submission of the MS 916 CAR.
		KSS will manage operations on adjacent KSS private property in accordance with requirements of Ministerial Statements and other licences.	C	KSS were found to be largely compliant with MS 366 and MS 703 during the reporting period, with minor non-compliance relating to water quality of reconstructed lakes to the east of the dredge pond in MS 366, and regarding rehabilitation monitoring methodology, as reported in the relevant CAR in October 2023.
5.7.3	Rehabilitation (Area 3)	Implementation of rehabilitation actions, inclusive of weed control, control of feral animals and application of local native seeds collected from the PKNR, is to be conducted within Area 3.	C	Weed and feral animal control conducted within Area 3 during the reporting period.
		Seedlings used in rehabilitation are to be acquired from an accredited nursery.	C	Tubestock used in small scale planting purchased from accredited nursery utilised for all KSS rehabilitation activities (Boyanup Botanical: https://boyanupbotanical.com.au/).
		Rehabilitation of Area 3 to be commenced in 2021.	C	Weed control, fire management and feral animal control was undertaken during 2023. Evidence of some natural regeneration observed in September 2023 site inspection within areas where soil and woody debris were previously spread.
		Following a period of one year after rehabilitation of Area 3, annual monitoring of transects is to occur for at least the first three years after which time the transect status will be reviewed and monitoring frequency adjusted based on the assessment of the rehabilitated area against completion criteria.	NR	Rehabilitation works are currently ongoing. Annual rehabilitation monitoring is not anticipated to be required for several years.
		Following a period of one year after rehabilitation of Area 3, an appropriate analogue site is to be chosen by a suitably qualified professional, which will be utilised to assess against rehabilitation of Area 3.	NR	
		Rehabilitation is to be assessed against relevant interim and completion criteria. In the event that completion criteria or interim targets are not met, the CEO of DWER will be notified.	NR	
Outcomes of annual rehabilitation monitoring is to be reported to the CEO of DWER	NR			