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8 March 2021

General Manager OEPA Services Division DWER
Attn: Manager, Compliance Branch
DWER, EPA Services Division
Locked Bag 10
Joondalup Delivery Centre
Western Australia, 6919

RE: Mulga Rock Uranium Project, 2020 Compliance Assessment Report.

Attn: Manager, Compliance Branch

Please find enclosed hard and electronic copies of the Annual Compliance Assessment Report for the Mulga Rock Uranium Project as required by Condition 4-6 of Ministerial Statement No. 1046.

Please let me know if you need any further information or have any queries: parthur@vimyresources.com.au, 08 9389 2725.

Kind regards,

A handwritten signature in black ink, appearing to read 'Paula Arthur', is written over a faint circular watermark.

Paula Arthur
Principal Environmental Officer
Vimy Resources



Mulga Rock Project

Compliance Assessment Report

08 March 2021

Authors and Revisions

Revision Number	Authorisation	Date	Signature
A	Paula Arthur	08/03/2021	-

Location on VIMY Server

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1. Introduction

Vimy Resources Limited (Vimy) is developing the Mulga Rock uranium project located in Western Australia. The Mulga Rock Project is 100% owned and operated by Vimy and lies approximately 290km by road east-northeast of the regional mining city of Kalgoorlie–Boulder in the Shire of Menzies on two granted Mining Leases (M39/1104 and M39/1105) and associated Miscellaneous Leases. The Project is located within Unallocated Crown Land (UCL), on the western flank of the Great Victoria Desert. The nearest residential town is Laverton which is approximately 200km to the northwest. Other regional residential communities include Pinjin Station Homestead, located approximately 100km to the west; Kanandah Station Homestead, about 150km to the south-east; Tropicana Gold Mine approximately 110km to the north-east, and Mt Margaret Community, around 337km to the northwest.

The owner and proponent of the Project is Narnoo Mining Pty Ltd, a 100% subsidiary of Vimy Resources Limited (Vimy; ABN 56 120 178 949). Narnoo Mining is the sole holder for the tenements associated with this Project. The State of Western Australia granted Final Ministerial Approval under s.45(5)(b) of the *Environmental Protection Act 1986* (EP Act) in December 2016, Ministerial Statement No. 1046. The Australian Federal Government granted final approval under s.133 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) in March 2017. The assessment process was undertaken under a bilateral agreement between the State of Western Australia and the Commonwealth, but the approvals were granted separately under State and Commonwealth Acts.

The Mulga Rock Project (MRP) is the largest advanced uranium project in Australia with an Ore Reserve of 22.7 Mt at 845 ppm U_3O_8 for 42.3Mlb U_3O_8 . The Ore Reserve is a subset of the Mineral Resource which stands at 71.2 Mt at 570 ppm U_3O_8 for a contained 90.1Mlb U_3O_8 at a cut-off of 150 ppm U_3O_8 . The Project is made up of the Mulga Rock East mining area, comprising the Ambassador and Princess deposits, and the Mulga Rock West mining area comprising the Shogun and Emperor deposits.

The Project consists of two separate mining areas over a total length of 30km with the individual deposits ranging in length from 1km to 8km. The ore zones are up to 38m thick at Mulga Rock East with an average thickness of 4.5m, and up to 8m in thickness at Mulga Rock West with an average of 2.4m. Uranium mineralisation is hosted by flat-lying, carbonaceous clastic sediments which are in turn overlain by weathered, oxidised sediments that range in thickness from 19m to 62m forming the waste overburden. Owing to the nature of the host rock and overburden, over 90%, if not all, of the mining, will be done by free digging, with only a small requirement for drill and blast of cemented, silica-rich layers.

The deposits will be mined using large-scale open pits to produce an annualised peak capacity of 2,180t/a (4.8Mlbs) U_3O_8 . Due to the large lateral extent and horizontal geometry of the deposits, Vimy is proposing to use 'strip' mining techniques similar to those used in mineral sands and coal mining. Strip mining commences with the excavation of an initial box cut to expose the ore, with the overburden placed in a surface landform. After mining the ore exposed by the first slot cut, the resulting pit void is available to take the overburden from the next mining strip as mining moves along strike. In general, mining advances one strip at a time with previously mined areas progressively backfilled and rehabilitated. This mining method will result in 'real-time rehabilitation' resulting in a small environmental footprint at any given time and significant savings in waste movement and rehabilitation costs.

Vimy is required to submit to the CEO the first Compliance Assessment Report (CAR) fifteen (15) months from the date of issue of Statement No. 1046 addressing the twelve (12) month period from the date of issue, and then annually from the date of submission of the first Compliance Assessment Report. The reporting period covered in this CAR is from the 16 December 2019 to the 15 December 2020.

This CAR has been prepared in accordance with the *Post Assessment Guideline for Preparing a Compliance Assessment Report* (OEPA, 2012).¹

2. Implementation Status

During the reporting period, there was no change to the implementation status of the Project, and the Project remains in a pre-construction stage. There were no substantial works undertaken and no ground disturbance associated with the implementation of the Project.

No issues were raised, and no project milestones or achievements occurred during the reporting period.

The Ambassador investigative trenches remain in care and maintenance.

3. Statement of Compliance

A Statement of Compliance has been prepared in accordance with the OEPA's Post Assessment Form for a Statement of Compliance and is presented in Appendix 1.

4. Details of Declared Compliance Status

The declared compliance status of each condition is presented in the Mulga Rock Uranium Project, Statement No. 1046 Audit Table, Appendix 2.

4.1 Monitoring and Management Plans

Conditions 6 and 7 of Ministerial Statement No. 1046 require Vimy to prepare and submit Condition Environmental Management Plans (CEMP's) before the commencement of substantial works.

The following CEMP's have been approved by the OEPA.

- Aboriginal Heritage Management Plan
- Above Ground Tailings Storage Facility Monitoring and Management Plan
- Flora and Vegetation Monitoring and Management Plan
- Groundwater Monitoring and Management Plan
- Soil Monitoring and Management Plan (Management-based)
- Soil Monitoring and Management Plan (Outcome-based)
- Tailings Storage Facility Monitoring and Management Plan
- Terrestrial Fauna Monitoring and Management Plan.

One CEMP is still under review by the OEPA.

- The Above Ground Tailings Storage Facility Monitoring and Management Plan.

All CEMP's were written in accordance with the "Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (EPA, 2016²)".

¹ OEPA (2012). *Post Assessment Guideline for Preparing a Compliance Assessment Report*, Post Assessment Guideline No. 3, Office of the Environmental Protection Authority (OEPA), August 2012,

² EPA (2016). *Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans*, Environmental Protection Authority, Perth, Western Australia.

4.2 Supporting Information

Supporting information is presented in Appendix 1 to 4.

4.3 Raw Data

No raw data has been presented as part of this CAR; the Project has not yet been constructed or implemented; therefore, environmental monitoring results are not available for the reporting period.

5. Proposed Changes

No proposed changes to the CAP have been included in this CAR.



Appendix 1

Statement of Compliance

Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	Mulga Rock Uranium Project
Statement Number	1046
Proponent Name	Vimy Resources Limited
Proponent's Australian Company Number <i>(where relevant)</i>	ACN: 120 178 949

2. Statement of Compliance Details

Reporting Period	16/12/19 to 15/12/20
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Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input checked="" type="checkbox"/>	Construction	<input type="checkbox"/>	Operation	<input type="checkbox"/>	Decommissioning	<input type="checkbox"/>

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	2
Attached to the CAR as Appendix 2	

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

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

INITIALS: PA

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

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

Non-compliance/potential non-compliance 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?
N/A
Was the implementation condition or procedure non-compliant or potentially non-compliant?
N/A
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?
N/A

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally Date _____ <input type="checkbox"/> Reported to DWER in writing Date _____	<input type="checkbox"/> No

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?
N/A
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)
N/A
What was the cause(s) of the non-compliance or potential non-compliance?
N/A
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?
N/A
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?
N/A
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: <ul style="list-style-type: none"> • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. (the above information may be provided as an attachment to this Statement of Compliance)

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

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.
 INITIALS: *TD*

4. Proponent Declaration

I, Paula Arthur, Principal Environmental Officer, (full name and position title) declare that I am authorised on behalf of Vimy Resources (being the person responsible for the proposal) to submit this form and that the information contained in this form is true and not misleading.

Signature:  Date: 8.3.21

Please note that:

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

5. Submission of Statement of Compliance

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

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

6. Contact Information

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

Manager, Compliance (Ministerial Statements)
Department of Water and Environmental Regulation

Postal Address: Locked Bag 10
EAST PERTH WA 6892
Phone: (08) 6364 700
Email: compliance@dwer.wa.gov.au

7. Post Assessment Guidelines and Forms

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

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.
INITIALS: PA

ATTACHMENT 1

Table 1 Compliance Status Terms

Compliance Status Terms	Abbrev	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: <ul style="list-style-type: none"> • ongoing requirements that have been met during the reporting period; and • requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: <ul style="list-style-type: none"> • audit elements have a finite period of application (e.g. construction activities, development of a document); • the action has been satisfactorily completed; and • the DWER has provided written acceptance of 'completed' status for the audit element.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	<p>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</p> <p>The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).</p>

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.
 INITIALS: PA



Appendix 2

MRP Audit Table

Note:

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

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1046:M1.1	Proposal Implementation	When implementing the Proposal, the proponent shall not exceed the authorised extent of the Proposal as defined in Table 2 in Schedule 1, unless amendments to the Proposal and the authorised extent of the Proposal have been approved under the EP Act.	<p><u>Open cut mine pits</u> A Ground Disturbance Activity Permit (GDAP) will be required prior to all ground disturbance to ensure that no more than 2,374ha within the 9,998ha Development Envelope is cleared.</p> <p><u>Associated infrastructure</u> A Ground Disturbance Activity Permit (GDAP) will be required prior to all ground disturbance to ensure that no more than 1,307ha within the 9,998ha Development Envelope is cleared.</p> <p><u>Backfilling of mine pits</u> Confirmation of backfilling to at least 10m above the water table will be achieved by survey.</p> <p><u>Above-ground TSF</u> A Ground Disturbance Activity Permit (GDAP) will be required prior to all ground disturbance to ensure that no more than 106ha within the 9,998ha Development Envelope is cleared.</p> <p><u>Tailings disposal</u> Disposal flow rates will be measured to ensure no more than 3Mtpa of beneficiation</p>	<p><u>Open cut mine pits</u> Ground disturbance data will be reported to DMIRS (Annual Environmental Review – AER) and DWER (Compliance Assessment Report – CAR) annually.</p> <p><u>Associated infrastructure</u> Ground disturbance data will be reported to DMIRS (Annual Environmental Review – AER) and DWER (CAR) annually.</p> <p><u>Backfilling of mine pits</u> Survey data will be submitted annually to DMIRS (Annual Environmental Review – AER) and DWER (CAR).</p> <p><u>Above-ground TSF</u> Ground disturbance data will be reported to DMIRS (Annual Environmental Review – AER) and DWER (CAR) annually.</p> <p><u>Tailings disposal</u> Disposal flow rates of beneficiation rejects, and post-leaching tailings, will be reported to DMIRS (AER) and DWER (CAR).</p> <p><u>Water abstraction</u></p>	Overall	Within 7 days of awareness of any potential non-compliance.	NR	Construction and operation of the project has not yet commenced, so there has been no ground disturbance, tailings deposition, additional groundwater abstraction, mine dewatering or reinjection.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
			<p>rejects and no more than 2Mtpa of post-leaching tailings materials are discharged.</p> <p><u>Water abstraction</u> Groundwater abstraction flow rates will be measured to ensure no more than 3GL/a are extracted from the Kakarook North Borefield.</p> <p><u>Mine dewatering</u> Mine pit dewatering flow rates or pit water utilization rates will be measured to ensure no more than 2.5GL/a are extracted.</p> <p><u>Water reinjection</u> Reinjection flow rates will be measured to ensure no more than 1.5GL/a are reinjected into the reinjection borefield.</p>	<p>Groundwater abstraction flow rates will be reported to DMIRS (AER) and DWER (CAR).</p> <p><u>Mine dewatering</u> Mine pit dewatering flow rates will be reported to DMIRS (AER) and DWER (CAR).</p> <p><u>Water reinjection</u> Water reinjection flow rates will be reported to DMIRS (AER) and DWER (CAR).</p>				
1046:M2.1	Contact Details	The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Notify the CEO in writing of any changes.	Copy of written correspondence.	Overall	Within 28 days of change.	NR	There has been no change in company name, physical address or postal address over the reporting period.
1046:M3.1	Time Limit for Proposal Implementation	The proponent shall not commence implementation of the Proposal after five (5) years from the date on this Statement, and any commencement, prior to this date, must be substantial.	No commencement of the project after 5 years from 16 December 2016.	Absence of written correspondence informing the CEO that we have commenced substantial implementation.	Construction	After 5 years from the date of this Statement.	C	The Proposal is still within the 5-year date of issue of Statement No. 1046.
1046:M3.2	Time Limit for Proposal Implementation	Any commencement of implementation of the Proposal, on or before five (5) years from the date of this Statement, must be demonstrated as substantial	Provide written evidence of substantial implementation of the project to the CEO within 5 years of issue of the	Written correspondence to CEO containing copies of the Mining Proposal or Works Approval that the substantial work is being	Construction	On or before 5 years from the date of this Statement	NR	The Proposal has not commenced, the Mining Proposal and Works Approvals have not been approved by the relevant DMA's, there has

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		by providing the CEO with written evidence, on or before the expiration of five (5) years from the date of this Statement.	statement (16 December 2016).	performed under and evidence in the form of photographs and an approved GDAP indicating that the work is substantial.				been no substantial implementation of the project.
1046:M4.1	Compliance Reporting	The proponent shall prepare, submit and maintain a Compliance Assessment Plan to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation, whichever is sooner.	A Compliance Assessment Plan (CAP) will be submitted at least 6 months prior (September 2017) to the first CAR. Prepare the CAP in accordance with the "Post-Assessment Guideline for Preparing a Compliance Assessment Plan".	Copy of written correspondence CAP.	Pre-construction	6 months prior to the first CAR.	CLD	The CAP was submitted to DWER on the 18 September 2017. The CAP was approved by DWER on 2 October 2017.
1046:M4.2	Compliance Reporting	The Compliance Assessment Plan shall indicate: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments; (4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.	The CAP will serve as a plan for writing and submitting the CAR.	CAP	Overall	6 months prior to the first CAR.	CLD	The CAP was submitted to DWER on the 18 September 2017. The CAP was approved by DWER on 2 October 2017. The approved CAP has been attached in Appendix 3. The CAP has been used as guide for preparing and submitting the Compliance Assessment Report (CAR).
1046:M4.3	Compliance Reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2 the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.	Implement the CAP.	Copy of written correspondence from CEO.	Pre-construction	Upon receipt of notice in writing from the CEO that the CAP satisfies requirements.	C	The CAP was submitted to DWER on the 18 September 2017. The CAP was approved by DWER on 2 October 2017. The approval letter is attached in Appendix 4. The attached Compliance Assessment Report assess compliance as per condition 4-1 of the Statement.
1046: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	Do not dispose of any records of compliance assessments until advice is given by the CEO.	Copies of all reports will be retained digitally.	Overall	For the life of the project.	C	The approved CAP, and Audit Table and Compliance Assessment Report are all retained on the Vimy server hosted on the cloud and backed up regularly.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		available when requested by the CEO.						
1046:M4.5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.	Report all potential non-compliance to the CEO.	Copy of written correspondence to the CEO.	Overall	Within 7 days of awareness of any non-compliance.	NR	Zero potential non-compliance during the reporting period, therefore no notifications to the CEO.
1046:M4.6	Compliance Reporting	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO. The Compliance Assessment Report shall: (1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf; (2) include a statement as to whether the proponent has complied with the conditions; (3) identify all potential non-compliances and describe corrective and preventative actions taken; (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1.	Prepare and submit the CAR, in accordance with the approved CAP.	CAR	Overall	15 months from the date of issue of the Statement and then annually from the date of submission of the first CAR.	C	The CAR has been submitted 15 months from the date of issue of the Statement. The CAP and approval letter are presented in Appendix 3 and Appendix 4 respectively.
1046:M5.1	Public Availability of Data, Plans, Programs and Surveys	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	When required by the CEO and in accordance with the <i>State Records Act 2000</i> , <i>Electronic Transactions Act 2011</i> and <i>Freedom of Information Act 1992</i> .	Copies of environmental data and derived information products.	Overall	Within a reasonable time period approved by the CEO.	NR	There have been no requests by the CEO for data, plans programs and surveys during the reporting period.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		environmental data and derived information products (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)) relevant to the assessment of this proposal and implementation of this Statement.						
1046:M5.2	Public Availability of Data, Plans, Programs and Surveys	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 these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.	In accordance with the <i>State Records Act 2000</i> , <i>Electronic Transactions Act 2011</i> and <i>Freedom of Information Act 1992</i> .	Written correspondence with the CEO.	Overall	When required and in accordance with record keeping legislation.	NR	There have been no requests by the CEO for data, plans programs and surveys during the reporting period.
1046:M6.1	Outcome-based Condition Environmental Management Plan	The proponent shall prepare and submit Condition Environmental Management Plans: (1) Prior to substantial commencement of the proposal or as otherwise agreed in writing by the CEO, to demonstrate that the environmental outcomes in conditions 13-1, 15-1 and 16-1 will be met.	Prepare and submit Condition Environmental Management Plans in accordance with the "Instructions on how to prepare <i>Environmental Protection Act 1986</i> Part IV Environmental Management Plans" and ensure that they meet the environmental outcomes specified in conditions 13-1, 15-1 and 16-1.	Condition Environmental Management Plans. Approval notice from the CEO.	Pre-construction	Prior to commencement of substantial works.	IP	There has been no substantial commencement of the proposal. Condition Environmental Management Plans have been prepared and submitted as per Statement No. 1046 conditions 13-1, 15-1 and 16-1. The Condition Environmental Management Plans have been reviewed by the EPA Services Division of DWER. The Above Ground Tailings Storage Facility Monitoring and Management Plan is still under assessment by EPA Services Division of DWER, all other outcome based Condition Environmental Management Plans have been approved.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1046:M6.2	Outcome-based Condition Environmental Management Plan	The Condition Environmental Management Plan(s) shall: (1) specify the environmental outcomes to be achieved, as specified in conditions 13-1, 15-1 and 16-1; (2) specify trigger criteria that will provide early warning for the implementation of trigger level actions if exceeded; (3) specify threshold criteria that: (a) provides a limit beyond which the environmental outcome identified in conditions 13-1, 15-1 and 16-1 is not achieved; and (b) will trigger the implementation of threshold contingency actions if exceeded. (4) specify monitoring to determine if trigger criteria and threshold criteria are exceeded; (5) specify trigger level actions to be implemented in the event that trigger criteria have been exceeded; (6) specify threshold contingency and remedial actions to be implemented in the event that threshold criteria are exceeded; (7) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that conditions 13-1, 15-1 and 16-1 have been met over the reporting period in the Compliance Assessment Report required by condition 4-6; and (8) provide for reporting of exceedances of the trigger and threshold criteria.	Prepare and submit Condition Environmental Managements Plans containing information specified in condition 6-2 of Statement 1046.	Condition Environmental Management Plans. Approval notice from the CEO.	Pre-construction	Prior to commencement of substantial works.	IP	Condition Environmental Management Plans have been prepared and submitted prior to the commencement of substantial works; no substantial works have commenced during the reporting period.
1046:M6.3	Outcome-based Condition Environmental Management Plan	After receiving notice in writing from the CEO that the Condition Environmental Management Plans satisfy the requirements of condition 6-2 for conditions 13-1, 15-1 and 16-1, the proponent shall, prior to the	Implement the Condition Environmental Management Plans that satisfy condition 6-2 for conditions 13-1, 15-1 and 16-1.	Approval notice from the CEO. Performance against the Condition Environmental Management Plans will be reported in the annual Compliance Assessment Report (CAR).	Overall	Prior to commencement of substantial works and throughout the life of the project.	IP	No substantial works have commenced during the reporting period. Outcome-based Condition Environmental Management Plans have been prepared and submitted to the EPA Services Division of DWER.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		commencement of ground disturbing activities: (1) commence implementation of the provisions of the Condition Environmental Management Plan(s); and (2) continue to implement the Condition Environmental Management Plan(s) until the CEO has confirmed by notice in writing that the proponent has demonstrated the outcomes specified in conditions 13-1, 15-1 and 16-1 have been met.						The Above Ground Tailings Storage Facility Monitoring and Management Plan is still under assessment by EPA Services Division of DWER, all other outcome based Condition Environmental Management Plans have been approved.
1046:M6.4	Outcome-based Condition Environmental Management Plan	In the event that monitoring indicates exceedance of trigger criteria and/or threshold criteria specified in the Condition Environmental Management Plan(s), the proponent shall: (1) report the exceedance to the CEO in writing within seven (7) days of the exceedance being identified; (2) immediately implement the trigger level actions and/or threshold contingency actions specified in the Condition Environmental Management Plan(s) and continue implementation of those actions until the trigger criteria and/or threshold criteria are being met and implementation of the trigger level actions and/or threshold contingency actions are no longer required; (3) investigate to determine the cause of the trigger criteria and/or threshold criteria being exceeded; (4) identify additional measures required to prevent the trigger and/or threshold criteria being exceeded in the future; (5) investigate to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria	If monitoring indicates exceedance of either trigger and/or threshold criteria outlined in the Condition Environmental Management Plans, then the CEO will be notified in accordance with the requirements of condition 6-4.	Copy of correspondence to CEO advising of trigger and/or threshold exceedance(s).	Overall	Notify CEO within 7 days of the exceedance being identified. Immediately implement contingency actions. Provide a report to the CEO within 90 days of the exceedance being reported.	IP	Environmental monitoring associated with the Condition Environmental Management Plans (CEMPs) has not commenced because: I. there have been no substantial works undertaken during the reporting period; and II. there has been no commencement of the project. As a result, there have been no exceedance of proposed trigger and/or threshold criteria specified in the CEMPs.



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		being exceeded; and (6) provide a report to the CEO within ninety (90) days of the exceedance being reported. The report shall include: (a) details of trigger level actions or threshold contingency actions implemented; (b) the effectiveness of the trigger level actions or threshold contingency actions implemented, monitored and measured against trigger criteria and threshold criteria; (c) the findings of the investigations required by condition 6-4(3) and 6-4(5); (d) additional measures to prevent the trigger or threshold criteria being exceeded in the future; and (e) measures to prevent, control or abate the environmental harm which may have occurred.						
1046:M6.5	Outcome-based Condition Environmental Management Plan	The proponent: (1) may review and revise the Condition Environmental Management Plan(s), or (2) shall review and revise the Condition Environmental Management Plan(s) as and when directed by the CEO.	Review and revise Conditional Environmental Management Plans as required.	Written correspondence. Revised Condition Environmental Management Plans.	Overall	As required and/or as directed by CEO.	IP	For the entire reporting period, the CEMPs were under review by the EPA Services Division of the DWER, therefore no revisions have been made during the reporting period.
1046:M6.6	Outcome-based Condition Environmental Management Plan	The proponent shall implement the latest revision of the Condition Environmental Management Plan(s), which the CEO has confirmed by notice in writing, satisfies the requirements of condition 6-2.	Implement latest approved Condition Environmental Management Plans at all times.	Copy of approval letter from CEO.	Overall	Implement the current confirmed (by CEO) version of the Environmental Management Plans.	IP	For the entire reporting period, the required CEMPs were under review by the EPA Services Division of the DWER, once the project commences the relevant CEMPs will be implemented.
1046:M7.1	Management-based Condition Environmental Management Plans	The proponent shall prepare and submit Condition Environmental Management Plans: (1) Prior to substantial commencement of the proposal or as otherwise agreed in writing by the CEO, to demonstrate that the environmental objectives in conditions 9-1, 10-1, 11-1, 12-1 and 14-1 will be met.	Prepare and submit Condition Environmental Management Plans in accordance with the "Instructions on how to prepare <i>Environmental Protection Act 1986</i> Part IV Environmental Management Plans" and ensure that they meet the environmental	Condition Environmental Management Plans. Approval notice from the CEO.	Pre-construction	Prior to substantial commencement of work.	IP	There has been no substantial commencement of the proposal. Management based Condition Environmental Management Plans have been prepared and submitted as per Statement No. 1046 conditions 9-1, 10-1, 11-1, 12-1 and 14-1.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
			objectives specified in conditions 9-1, 10-1, 11-1, 12-1 and 14-1.					The management-based Condition Environmental Management Plans were under review and approved by the EPA Services Division of the DWER during the reporting period.
1046:M7.2	Management-based Condition Environmental Management Plans	The Condition Environmental Management Plan(s) shall: (1) specify the environmental objectives to be achieved, as specified in conditions 9-1, 10-1, 11-1, 12-1 and 14-1; (2) specify risk-based management actions that will be implemented to demonstrate compliance with the environmental objectives specified in 9-1, 10-1, 11-1, 12-1 and 14-1. Failure to implement one or more of the management actions represents non-compliance with these conditions; (3) specify measurable management target(s) to determine the effectiveness of the risk-based management actions; (4) specify monitoring to measure the effectiveness of management actions against management targets, including but not limited to, parameters to be measured, baseline data, monitoring locations, and frequency and timing of monitoring; (5) specify a process for revision of management actions and changes to proposal activities, in the event that the management targets are not achieved. The process shall include an investigation to determine the cause of the management target(s) being exceeded; (6) provide the format and timing to demonstrate that 9-1, 10-1, 11-1, 12-1 and 14-1 have been met for the reporting period in	Prepare and submit Condition Environmental Managements Plans containing information specified in condition 7-2 of Statement 1046.	Condition Environmental Management Plans. Approval notice from the CEO.	Pre-construction	Prior to substantial commencement of work.	IP	Condition Environmental Management Plans have been prepared, submitted and approved prior to the commencement of substantial works; no substantial works have commenced during the reporting period. The CEMPs have been prepared and submitted as per Statement No. 1046 conditions 9-1, 10-1, 11-1, 12-1 and 14-1, and contain information specified in condition 7-2.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		the Compliance Assessment Report required by condition 4-6 including, but not limited to: (a) verification of the implementation of management actions; and (b) reporting on the effectiveness of management actions against management target(s).						
1046:M7.3	Management-based Condition Environmental Management Plans	After receiving notice in writing from the CEO that the Condition Environmental Management Plan(s) satisfies the requirements of condition 7-2 for conditions 9-1, 10-1, 11-1, 12-1 and 14-1, the proponent shall: (1) implement the provisions of the Condition Environmental Management Plan(s); and (2) continue to implement the Condition Environmental Management Plan(s) until the CEO has confirmed by notice in writing that the proponent has demonstrated the objectives specified in conditions 9-1, 10-1, 11-1, 12-1 and 14-1 have been met.	Implement the Condition Environmental Management Plans that satisfy condition 7-2 for conditions 9-1, 10-1, 11-1, 12-1 and 14-1.	Approval notice from the CEO. Performance against the Condition Environmental Management Plans will be reported in the annual Compliance Assessment Report (CAR).	Overall	Prior to commencement of substantial works and throughout the life of the project.	IP	No substantial works have commenced during the reporting period. Management-based Condition Environmental Management Plans have been prepared and submitted to the EPA Services Division of the DWER. The Condition Environmental Management Plans were approved the EPA Services Division of DWER during the reporting period. Once written approval has been received from the CEO the CEMPs will be implemented to satisfy condition 7-2 for conditions 9-1, 10-1, 11-1, 12-1 and 14-1.
1046:M7.4	Management-based Condition Environmental Management Plans	In the event that monitoring, tests, surveys or investigations indicate exceedance of management target(s) specified in the Condition Environmental Management Plan(s), the proponent shall: (1) report the exceedance in writing to the CEO within 21 days of the exceedance being identified; (2) investigate to determine the cause of the management targets being exceeded; (3) provide a report to the CEO within 90 days of the exceedance being reported as required by condition 7-4(1). The report shall include:	If monitoring indicates exceedance of management target(s) outlined in the Condition Environmental Management Plans, then the CEO will be notified in accordance with the requirements of condition 7-4.	Copy of correspondence to CEO advising of target exceedance(s).	Overall	Notify CEO in writing within 21 days of the exceedance being identified. Investigate cause of exceedance and provide a report to the CEO within 90 days of the exceedance being reported.	IP	Environmental monitoring associated with the Condition Environmental Management Plans (CEMPs) has not commenced because: I. there have been no substantial works undertaken during the reporting period; and II. there has been no commencement of the project. As a result, there have been no exceedance of proposed trigger and/or threshold criteria specified in the CEMPs.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(a) cause of management targets being exceeded; (b) the findings of the investigation required by conditions 7-4(2); (c) details of revised and/or additional management actions to be implemented to prevent exceedance of the management target(s); and (d) relevant changes to proposal activities.						
1046:M7.5	Management-based Condition Environmental Management Plans	In the event that monitoring, tests, surveys or investigations indicate that one or more management actions specified in the Condition Environmental Management Plan(s) have not been implemented, the proponent shall: (1) report the failure to implement management action/s in writing to the CEO within 7 days of identification; (2) investigate to determine the cause of the management action(s) not being implemented; (3) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to the failure to implement management actions; (4) provide a report to the CEO within 21 days of the reporting required by condition 7-5(1). The report shall include: (a) cause for failure to implement management actions; (b) the findings of the investigation required by conditions 7-5(2) and 7-5(3); (c) relevant changes to proposal activities; and (d) measures to prevent, control or abate the environmental harm which may have occurred.	If monitoring indicates that management actions specified in the Condition Environmental Management Plans have not been implemented, then the CEO will be notified in accordance with the requirements of Condition 7-5.	Copy of correspondence to CEO advising of potential non-compliance. Copy of report investigating potential non-compliance.	Overall	Report failure to implement management actions in writing to CEO within 7 days of identification. Investigate cause. Provide a report to the CEO within 21 days of reporting the potential non-compliance.	IP	Management actions outlined in the Condition Environmental Management Plans (CEMPs) have not yet been implemented because: II. there have been no substantial works undertaken during the reporting period; and III. there has been no commencement of the project.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1046:M7.6	Management-based Condition Environmental Management Plans	The proponent: (1) may review and revise the Condition Environmental Management Plan(s), or (2) shall review and revise the Condition Environmental Management Plan(s) as and when directed by the CEO.	Review and revise Conditional Environmental Management Plans as required.	Written correspondence. Revised Condition Environmental Management Plans.	Overall	As required or when directed by the CEO.	IP	The CEMPs were under review and approved by the EPA Services Division of the DWER, therefore no revisions have been made during the reporting period.
1046:M7.7	Management-based Condition Environmental Management Plans	The proponent shall implement the latest revision of the Condition Environmental Management Plan(s), which the CEO has confirmed by notice in writing, satisfies the requirements of condition 7-2.	Implement Condition Environmental Management Plans prior to the commencement of ground disturbing activities.	Written correspondence. Copy of approval letter from CEO.	Overall	When confirmation has been received in writing from the CEO.	IP	During the reporting period, the CEMPs were under review and approved by the EPA Services Division of the DWER; once approved the CEMPs will be implemented.
1046:M8.1	Flora and Vegetation (Outcome based)	The proponent shall manage the implementation of the Proposal to meet the following environmental outcomes: (1) avoid direct impacts to Hakea sp. LAC139 and LAC140 including a 50m buffer; (2) ensure that no more than 3,474ha of vegetation community E3 and 200ha of vegetation community S6 is cleared within the project development envelope as delineated in Figure 3 of Schedule 1 and defined by the geographic coordinates in Schedule 2; and (3) ensure the eradication of all weeds introduced in the development envelope as a result of the implementation of the proposal.	Implement the approved Flora and Vegetation Monitoring and Management Plan so that the environmental outcomes specified in condition 8-1 are met.	Compliance Assessment Report (CAR). Vegetation monitoring results. Ground disturbance areas on GIS database. Annual MRF report.	Overall	Once Proposal implementation commences. For the life of the project monitor in accordance with the Flora and Vegetation Monitoring and Management Plan.	IP	Proposal implementation has not commenced. The approved Flora and Vegetation Monitoring and Management Plan will be implemented once the proposal commences. Monitoring results will be presented in the CAR and AER, and accounted for under the MRF Levy report
1046:M9.1	Flora and Vegetation (Objective based)	The proponent shall manage the implementation of the Proposal to meet the following environmental objectives: (1) minimise direct and indirect impacts as far as practicable on all conservation significant flora species; and (2) minimise direct and indirect impacts as far as practicable on the vegetation communities E3 and S6.	Implement the approved Flora and Vegetation Monitoring and Management Plan, so that the environmental objectives specified in condition 9-1 are met.	CAR Vegetation monitoring results. Ground disturbance areas on GIS database. Annual MRF report.	Overall	Once Proposal implementation commences. For the life of the project monitor in accordance with the Flora and Vegetation Monitoring and Management Plan.	IP	Proposal implementation has not commenced. The approved Flora and Vegetation Monitoring and Management Plan will be implemented once the proposal commences. Monitoring results will be presented in the CAR and AER.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1046:M9.2	Flora and Vegetation (Objective based)	The proponent shall consult with Parks and Wildlife and prepare a Flora and Vegetation Monitoring and Management Plan required by condition 7-1 that satisfies the requirements of condition 7-2, to meet the objective required by condition 9-1.	Consult with DBCA (formerly Parks and Wildlife) in the preparation of the Flora and Vegetation Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DBCA.	Pre-construction	Prior to submitting the Flora and Vegetation Monitoring and Management Plan to the OEPA for approval.	CLD	The approved Flora and Vegetation Monitoring and Management Plan was prepared in consultation with DBCA prior to submission to the CEO for approval.
1046:M9.3	Flora and Vegetation (Objective based)	The Flora and Vegetation Monitoring and Management Plan required by condition 7-1 shall include provisions required by condition 7-2 to address impacts on conservation significant flora and vegetation health including from, but not limited to: direct clearing, dust, use of groundwater for dust suppression, fire regimes and weeds.	Implement the approved Flora and Vegetation Monitoring and Management.	Written approval from the CEO that the Flora and Vegetation Monitoring Plan addresses the requirements of condition 7.2 Compliance Assessment Report. Flora and Vegetation Monitoring and Management Plan. Monitoring Schedule.	Pre-construction	To be included in the Flora and Vegetation Monitoring and Management Plan.	IP	The approved Flora and Vegetation Monitoring and Management Plan will be implemented pre-construction of the proposal. Monitoring results will be presented in the CAR and AER.
1046:M9.4	Flora and Vegetation (Objective based)	The proponent shall continue to implement the version of the Flora and Vegetation Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Flora and Vegetation Monitoring and Management Plan required by condition 7-1 satisfies the requirements of condition 7-2 to meet the objectives required by condition 9-1.	Implement the approved version of the Flora and Vegetation Monitoring and Management Plan.	Written correspondence from CEO	Overall	Once Proposal implementation commences. Implement current version of the Flora and Vegetation Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.	IP	Proposal implementation has not commenced Therefore no revisions have been made during the reporting period.
1046:M10.1	Terrestrial Fauna	The proponent shall manage the implementation of the Proposal to meet the following environmental objectives: (1) minimise direct and indirect impacts as far as practicable on conservation significant terrestrial fauna species; and (2) monitor the presence of the Sandhill Dunnart using methodology established in the Camera Trapping Program.	Implement the approved Terrestrial Fauna Monitoring and Management Plan, so that the environmental objectives specified in condition 10-1 are met.	CAR Terrestrial Fauna Monitoring and Management Plan. Sandhill Dunnart monitoring results. Ground disturbance areas on GIS database.	Overall	Once Proposal implementation commences. For the life of the project.	IP	Proposal implementation has not commenced. The Terrestrial Fauna Monitoring and Management Plan was under review by the EPA Services Division of the DWER for during the reporting period and approved on the 20 February 2020. It will be implemented when proposal commencement occurs, and monitoring results will be presented



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
				Annual Sandhill Dunnart Report for DBCA.				in the CAR, Annual Sandhill Dunnart Report and AER.
1046:M10.2	Terrestrial Fauna	The proponent shall consult with Parks and Wildlife and prepare and submit a Terrestrial Fauna Monitoring and Management Plan (including a Camera Trapping Program) required by condition 7-1 that satisfies the requirements of condition 7-2, to meet the objective of condition 10-1.	Consult with DBCA (formerly Parks and Wildlife) in the preparation of the Terrestrial Fauna Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DBCA.	Pre-construction	Prior to the submission of the Terrestrial Fauna Monitoring and Management Plan to the CEO for approval.	CLD	The Terrestrial Fauna Monitoring and Management Plan was prepared in consultation with DBCA prior to submission to the CEO for approval.
1046:M10.3	Terrestrial Fauna	The Terrestrial Fauna Monitoring and Management Plan required by condition 7-1 shall include: (1) provisions required by condition 7-2 to manage potential impacts of the proposal on conservation significant fauna including from, but not limited to degradation of habitat from weeds, loss of habitat, feral animals, changes to fire regime, trenching for pipelines, and risk of vehicle strikes; and (2) the methodology of recording impacts to conservation significant fauna; and (3) the methodology of monitoring and registering the presence of the Sandhill Dunnart.	Implement the approved Terrestrial Fauna Monitoring and Management Plan.	CAR Terrestrial Fauna Monitoring and Management Plan. Monitoring Schedule. Sandhill Dunnart Conservation Management Plan.	Pre-construction	To be included in the Terrestrial Fauna Monitoring and Management Plan.	IP	The Terrestrial Fauna Monitoring and Management Plan was approved by the EPA Services Division of the DWER during the reporting period. The CEMP will be implemented to coincide with the commencement of construction, and monitoring results will be presented in the CAR, Annual Sandhill Dunnart Report and AER.
1046:M10.4	Terrestrial Fauna	The proponent shall provide the results of the Sandhill Dunnart register and the record of impacts to conservation significant fauna annually to Parks and Wildlife.	Provide Sandhill Dunnart monitoring results to DBCA.	Copy of the Sandhill Dunnart register and associated correspondence.	Overall	Once Proposal implementation commences. Annually.	NR	Proposal implementation has not commenced. Once significant works on the Project commence and the Project is implemented, the results from Sandhill Dunnart monitoring will be presented to the DBAC annually.
1046:M10.5	Terrestrial Fauna	The proponent shall continue to implement the version of the Terrestrial Fauna Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Terrestrial Fauna Monitoring and Management	Implement the approved version of the Flora and Vegetation Monitoring and Management Plan.	Written correspondence from CEO.	Overall	Once Proposal implementation commences. Implement current version of the Terrestrial Fauna Monitoring and	IP	Proposal implementation has not commenced. The Terrestrial Fauna Monitoring and Management plan was approved during the reporting period by the EPA Services Division of DWER, approval has been received in writing



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		Plan required by condition 7-1 satisfies the requirements of condition 7-2 to meet the objectives required by condition 10-1.				Management Plan until the CEO confirms in writing that a new version has been approved.		from the CEO. , No revisions have been made during the reporting period.
1046:M11.1	Aboriginal Heritage	The proponent shall manage the implementation of the Proposal to meet the following environmental objective: (1) minimise impacts as far as practicable to registered sites DAA 1985 and DAA 1986 and unregistered sites.	Implement the approved Aboriginal Heritage Management Plan, so that the environmental objectives specified in condition 11-1 are met.	CAR Aboriginal Heritage Management Plan.	Overall	Once Proposal implementation commences. For the life of the project.	IP	Proposal implementation has not commenced. The Aboriginal Heritage Management Plan was approved by the EPA Services Division of the DWER on the 3 January 2020.
1046:M11.2	Aboriginal Heritage	The proponent shall consult with the Department of Aboriginal Affairs and prepare an Aboriginal Heritage Management Plan required by condition 7-1 that satisfies the requirements of condition 7-2, to meet the objective of condition 11-1 for each stage of the Proposal to be implemented.	Consult with Department of Aboriginal Affairs in the preparation of the Aboriginal Heritage Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DAA.	Pre-construction	Prior to submission of the Aboriginal Heritage Management Plan to the CEO for approval.	CLD	The Aboriginal Heritage Management Plan was developed in consultation with the DAA prior to submission to the CEO for approval.
1046:M11.3	Aboriginal Heritage	The Aboriginal Heritage Management Plan required by condition 7-1 shall include provisions required by 7-2 to manage potential impacts of the proposal on aboriginal heritage including, but not limited to procedures for ground disturbance and environmental induction and training, and may be submitted for each stage of the Proposal prior to ground disturbing activities being undertaken for that stage, to be approved by the CEO.	Implement the approved Aboriginal Heritage Management Plan.	Aboriginal Heritage Management Plan. CAR	Overall	Prior to ground disturbing activities.	IP	The Aboriginal Heritage Management Plan will be implemented prior to ground disturbing activities and reported upon annually in the CAR.
1046:M11.4	Aboriginal Heritage	The proponent shall continue to implement the version of the Aboriginal Heritage Management plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Aboriginal Heritage Management plan required by condition 7-1 satisfies the requirements of condition 7-2 to	Implement the approved version of the Aboriginal Heritage Management Plan.	Written correspondence from CEO.	Overall	Implement current version of the Aboriginal Heritage Management Plan until the CEO confirms in writing that a new version has been approved.	IP	Approval has been received in writing from the CEO. The approved version of the Aboriginal Heritage Management Plan will now be implemented.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		meet the objective required by condition 11-1.						
1046:M12.1	Inland Waters Environmental Quality (Dewatering)	The proponent shall manage the abstraction of groundwater for dewatering and the reinjection to meet the following environmental objective: (1) minimise impacts to groundwater quality as far as practicable.	Implement the approved Groundwater Monitoring and Management Plan, so that the environmental objectives specified in condition 12-1 are met.	CAR Groundwater Monitoring and Management Plan.	Overall	Once Proposal implementation commences. For the life of the project.	IP	Proposal implementation has not commenced. The Groundwater Monitoring and Management Plan has been approved by the EPA Services Division of the DWER, once proposal implementation commences the CEMP will be implemented and monitoring results will be presented in the CAR. No dewatering or reinjection occurred during the reporting period.
1046:M12.2	Inland Waters Environmental Quality (Dewatering)	The proponent shall consult with the Department of Mines and Petroleum and prepare and submit a Groundwater Monitoring and Management Plan required by condition 7-1 that satisfies the requirements of condition 7-2, to meet the objectives required by condition 12-1.	Consult with DMIRS (formerly DMP) in the preparation of the Groundwater Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre-construction	Prior to submission of the Groundwater Monitoring and Management Plan to the CEO for approval.	CLD	The Groundwater Monitoring and Management Plan was prepared in consultation with DMIRS prior to submission to the CEO for approval.
1046:M12.3	Inland Waters Environmental Quality (Dewatering)	The Groundwater Monitoring and Management Plan required by 7-1 shall include provisions required by 7-2 to manage impacts on water quality including, but not limited to Acid and Metalliferous Drainage from seepage into groundwater and the reinjection of surplus water into the aquifer.	Implement the approved Groundwater Monitoring and Management Plan.	Groundwater Monitoring and Management Plan. Compliance Assessment Report.	Pre-construction	To be included in the Groundwater Monitoring and Management Plan.	IP	The Groundwater Monitoring and Management has been approved by the EPA Services Division of the DWER, the CEMP will be implemented prior to the commencement of construction.
1046:M12.4	Inland Waters Environmental Quality (Dewatering)	The proponent shall continue to implement the version of the Groundwater Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Groundwater Monitoring and Management Plan required by condition 7-1 satisfies the requirements of condition 7-2 to meet the objectives required by condition 12-1.	Implement the approved version of the Groundwater Monitoring and Management Plan.	Written correspondence from CEO.	Overall	Once Proposal implementation commences. Implement current version of the Groundwater Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.	IP	Proposal implementation has not commenced. The Groundwater Monitoring and Management plan has been approved by the EPA Services Division of the DWER. Approval has been received in writing from the CEO.



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1046:M13.1	Terrestrial Environmental Quality (Outcome based)	The proponent shall manage the implementation of the Proposal to meet the following environmental outcome: (1) maintain soil quality within background concentrations established during baseline studies 10 metres from areas where dewater has been used for dust suppression in Sandhill Dunnart Habitat (i.e. E3 and S6 vegetation communities).	Implement the approved Soil Monitoring and Management Plan, so that the environmental outcome specified in condition 13-1 are met.	CAR Soil Monitoring and Management Plan.	Overall	Once Proposal implementation commences. For the life of the project.	IP	Proposal implementation has not commenced. The outcome-based Soil Monitoring and Management has been approved by the EPA Services Division of the DWER, once proposal implementation occurs the CEMP will be implemented and monitoring results will be presented in the CAR. No dewatering water used for dust suppression during the reporting period.
1046:M13.2	Terrestrial Environmental Quality (Outcome based)	The proponent shall consult with the Department of Mines and Petroleum and prepare and submit a Soil Monitoring and Management Plan required by condition 6-1 that satisfies the requirements of condition 6-2, to meet the outcome of condition 13-1.	Consult with DMIRS (formerly DMP) in the preparation of the Soil Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre-construction	Prior to submission of the Soil Monitoring and Management Plan to the CEO for approval.	CLD	The outcome-based Soil Monitoring and Management Plan was prepared in consultation with DMIRS prior to submission to the CEO for approval.
1046:M13.3	Terrestrial Environmental Quality (Outcome based)	The proponent shall continue to implement the version of the Soil Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Soil Monitoring and Management Plan required by condition 6-1 satisfies the requirements of condition 6-2 to meet the outcome required by condition 13-1.	Implement the approved version of the Soil Monitoring and Management Plan.	Written correspondence from CEO.	Overall	Once Proposal implementation commences. Implement current version of the Soil Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.	IP	Proposal implementation has not commenced. The outcome-based Soil Monitoring and Management has been approved by the EPA Services Division of the DWER. Approval has been received in writing from the CEO.
1046:M14.1	Terrestrial Environmental Quality (Objective based)	The proponent shall manage the implementation of the Proposal to meet the following environmental objective: (1) minimise impacts on soil quality as far as practicable resulting from lignite oxidation within stockpiles and the use of dewater for dust suppression.	Implement the approved Soil Monitoring and Management Plan, so that the environmental objective specified in condition 14-1 is met.	CAR Soil Monitoring and Management Plan.	Overall	Once Proposal implementation commences. For the life of the project.	IP	Proposal implementation has not commenced. The Soil Monitoring and Management Plan has been approved by the EPA Services Division of the DWER, once proposal implementation commences the CEMP will be implemented and monitoring results will be presented in the CAR.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								No dewater used for dust suppression during the reporting period.
1046:M14.2	Terrestrial Environmental Quality (Objective based)	The proponent shall consult with the Department of Mines and Petroleum and prepare and submit a Soil Monitoring and Management Plan required by condition 7-1 that satisfies the requirements of condition 7-2, to meet the objectives required by condition 14-1.	Consult with DMIRS (formerly DMP) in the preparation of the Soil Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre-construction	Prior to submission of the objective based Soil Monitoring and Management Plan to the CEO for approval.	CLD	The Soil Monitoring and Management Plan was prepared in consultation with DMIRS prior to submission to the CEO for approval.
1046:M14.3	Terrestrial Environmental Quality (Objective based)	The Soil Monitoring and Management Plan required by 7-1 shall include provisions required by condition 7-2 to manage potential impacts to soil quality including but not limited to Acid and Metalliferous Drainage seepage into soil from oxidation of lignite and use of dewater for dust suppression.	Implement the approved Soil Monitoring and Management Plan.	Soil Monitoring and Management Plan Compliance Assessment Report.	Pre-construction	To be included in the objective based Soil Monitoring and Management Plan.	IP	The Soil Monitoring and Management plan has been approved by the EPA Services Division of the DWER. The Soil Monitoring and Management Plan will be implemented pre-construction.
1046:M14.4	Terrestrial Environmental Quality (Objective based)	The proponent shall continue to implement the version of the Soil Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Soil Monitoring and Management Plan required by condition 7-1 satisfies the requirements of condition 7-2 to meet the objective required by condition 14-1.	Implement the approved version of the Soil Monitoring and Management Plan.	Written correspondence from CEO.	Overall	Once Proposal implementation commences. Implement current version of the objective based Soil Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.	IP	Proposal implementation has not commenced. The Soil Monitoring and Management plan has been approved by the EPA Services Division of the DWER. Approval has been received in writing from the CEO
1046:M15.1	Tailings Storage Facilities	The proponent shall manage the design and maintenance of all TSFs to meet the following environmental outcomes: (1) ensure that the tailings plume is within background groundwater concentrations at the M39/1080 lease boundary as shown in Figure 4 of Schedule 1 and defined by the geographic coordinates in Schedule 2; (2) ensure that the in-pit TSFs are designed to have at least 2 metres of carbonaceous material beneath them and they are	Implement the approved version of the Tailings Storage Facility Monitoring and Management Plan, so that the environmental outcome specified in condition 15-1 are met.	Tailings Storage Facility Monitoring and Management Plan. Compliance Assessment Report.	Overall	Once Proposal implementation commences. For the life of the project.	IP	Proposal implementation has not commenced. The Tailings Storage Facility Monitoring and Management Plan has been approved by the EPA Services Division of the DWER, once the proposal implementation commences the CEMP will be implemented and monitoring results will be presented in the CAR. No construction or operation of a tailings storage facility commenced during the reporting period.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		covered with a minimum of 1 metre of appropriate material to act as a capillary break at closure; and (3) ensure that the above-ground Tailings Storage Facility is designed to have at least a 1 metre clay liner beneath it and is covered with a minimum of 1 metre of appropriate material to act as a capillary break at closure.						
1046:M15.2	Tailings Storage Facilities	The proponent shall consult with the Department of Mines and Petroleum and prepare a Tailings Storage Facility Monitoring and Management Plan required by condition 6-1 that satisfies the requirements of condition 6-2, to meet the outcomes of condition 15-1.	Consult with DMIRS (formerly DMP) in the preparation of the Tailings Storage Facility Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre-construction	Prior to submission of the Tailings Storage Facility Monitoring and Management Plan to the CEO for approval.	CLD	The Tailings Storage Facility Monitoring and Management Plan was prepared in consultation with DMIRS prior to submission to the CEO for approval.
1046:M15.3	Tailings Storage Facilities	The Tailings Storage Facility Monitoring and Management Plan required by condition 6-1 shall include provisions required by condition 6-2 to manage impacts on groundwater quality including from, but not limited to seepage of contaminants into the groundwater and/or soil.	Implement the approved version of the Tailings Storage Facility Monitoring and Management Plan.	Tailings Storage Facility Monitoring and Management Plan. CAR	Pre-construction	To be included in the Tailings Storage Facility Monitoring and Management Plan.	IP	The Tailings Storage Facility Monitoring and Management has been approved by the EPA Services Division of the DWER. The CEMP will be implemented pre-construction and annual results will be presented in the CAR.
1046:M15.4	Tailings Storage Facilities	The proponent shall continue to implement the version of the Tailings Storage Facility Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Tailings Storage Facility Monitoring and Management Plan required by condition 6-1 satisfies the requirements of condition 6-2 to meet the outcomes required by condition 15-1.	Implement the approved version of the Tailings Storage Facility Monitoring and Management Plan.	Written correspondence from CEO.	Overall	Once Proposal implementation commences. Implement current version of the Tailings Storage Facility Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.	IP	Proposal implementation has not commenced. The Tailings Storage Facility Monitoring and Management plan has been approved by the EPA Services Division of the DWER. Approval has been received in writing from the CEO
1046:M16.1	Above Ground Tailings Storage Facility	The proponent shall manage the implementation of the Proposal to meet the following environmental outcome using the best available landform	Implement the approved version of the Above Ground Tailings Storage Facility Monitoring and Management Plan, so that the	Above Ground Tailings Storage Facility Monitoring and Management Plan. CAR	Overall	Once Proposal implementation commences.	IP	Proposal implementation has not commenced. The Above Ground Tailings Storage Facility Monitoring and Management



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		modelling over 10,000 years post mine closure: (1) ensure that the above ground Tailings Storage Facility is safe to members of public and non-human biota, geo-technically and geomorphologically stable, and geo chemically non-polluting.	environmental outcome specified in condition 16-1 are met.			For the life of the project.		Plan is currently under review by the EPA Services Division of the DWER, once approved the CEMP will be implemented and monitoring results will be presented in the CAR. No construction or operation of a tailings storage facility commenced during the reporting period.
1046:M16.2	Above Ground Tailings Storage Facility	The proponent shall consult with the Department of Mines and Petroleum in the preparation of the Above Ground Tailings Storage Facility Monitoring and Management Plan required by condition 6-1 that satisfies the requirements of condition 6-2, to meet the outcome required by condition 16-1.	Consult with DMIRS (formerly DMP) in the preparation of the Above Ground Tailings Storage Facility Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre-construction	Prior to submission of the Above Ground Tailings Storage Facility Monitoring and Management Plan to the CEO for approval.	CLD	The Above Ground Tailings Storage Facility Monitoring and Management Plan was prepared in consultation with DMIRS prior to submission to the CEO for approval.
1046:M16.3	Above Ground Tailings Storage Facility	The Above Ground Tailings Storage Facility Monitoring and Management Plan required by condition 6-1 shall include provisions required by condition 6-2 to: (1) update the Landform Evolution Modelling at intervals not exceeding three (3) years, or as otherwise specified by the CEO, using digital elevation modelling data suited to the extent of the modelled area and consistent with best practice; and (2) detail appropriate rehabilitation measures, including, but not limited to timely trials for the revegetation of the tailings storage facility, where required.	Implement the approved version of the Above Ground Tailings Storage Facility Monitoring and Management Plan.	Above Ground Tailings Storage Facility Monitoring and Management Plan. CAR	Overall	Once Proposal implementation commences. For the life of the project.	IP	Proposal implementation has not commenced. The Above Ground Tailings Storage Facility Monitoring and Management Plan is currently under review by the EPA Services Division of the DWER, once approved the CEMP will be implemented and monitoring results will be presented in the CAR. No construction or operation of a tailings storage facility commenced during the reporting period.
1046:M16.4	Above Ground Tailings Storage Facility	The proponent shall continue to implement the Above Ground Tailings Storage Facility Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the plan required by	Implement the approved version of the Above Ground Tailings Storage Facility Monitoring and Management Plan.	Written correspondence from CEO.	Overall	Once Proposal implementation commences. Implement current version of the Above Ground Tailings Storage Facility	IP	Proposal implementation has not commenced. The Tailings Storage Facility Monitoring and Management plan is currently under review by the EPA Services Division of the DWER.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		condition 6-1 satisfies the requirements of condition 6-2 to meet the outcome required by condition 16-1.				Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.		Once approval has been received in writing from the CEO, that version of the Above Ground Tailings Storage Facility Monitoring and Management Plan will be implemented, and annual results will be presented in the CAR.
1046:M17.1	Staging and Timing for the Submission of Programs	Where these conditions require a management, monitoring or compliance reporting program to be submitted prior to a specified activity being undertaken, if that activity is to be undertaken in stages, then the management, monitoring or compliance reporting program may be submitted that relates only to (and prior to) the undertaking of that stage. Subsequent programs submitted for the subsequent stages of that activity must update and consolidate the program.	No substantial works will be undertaken before the relevant Monitoring and Management Plans have been approved by the CEO.	Copies of Condition Environmental Management Plans. Written correspondence from CEO approving Plans.	Pre-construction	Submit Monitoring and Management Plans prior to the construction of each stage if required.	NR	No substantial works have been undertaken at the Mulga Rock Uranium Project. All Monitoring and Management Plans have been submitted to the EPA Services Division of DWER. Approval has been received in writing from the CEO for all CEMP's except the Above Ground Tailings Storage Facility Monitoring and Management Plan which is still under review.



Appendix 3

Compliance Assessment Plan




Mulga Rock Uranium Project

Compliance Assessment Plan – Statement 1046

08 September 2017

Document Control and Company Authorisation

Revision Number	Author	Date	Signature
Rev1	Julian Tapp	08/09/2017	

Location on VIMY Server

S:\MRD\Environment Health and Safety\2.0 Environment\2.9 Government Reporting\2.9.3 CAP + CAR\Compliance Assessment Plan\Compliance Assessment Plan 2017 Rev1.docx

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1. Introduction

Vimy Resources proposes to develop the Mulga Rock Uranium Project (MRUP; the Project), 240km east-northeast of Kalgoorlie-Boulder in the Shire of Menzies. The Project will involve the open pit mining of four poly-metallic deposits with commercial grades of contained uranium hosted in carbonaceous material.

This Compliance Assessment Plan (CAP) has been prepared to guide assessment of compliance throughout the life of the Project against Statement 1046 issued under Section 45(5) of the *Environmental Protection Act 1986* (EP Act).

1.1 Background

The remote MRUP area covers 102,000 hectares (ha) of dune fields and is located within granted mining tenure (M39/1104 and M39/1105) on Unallocated Crown Land (UCL), on the western flank of the Great Victoria Desert (GVD). The nearest residential town is Laverton which is approximately 200km to the northwest. Other regional residential communities include Pinjin Station Homestead, located approximately 100km to the west; Coonana Aboriginal Community, approximately 130km to the south southwest; Kanandah Station Homestead, approximately 150km to the south-east; and the Tropicana Gold Mine approximately 110km to the north-east.

During the operation of the MRUP up to 4.5 Million tonnes per annum (Mtpa) of ore will be mined by traditional open cut techniques, crushed, beneficiated and then processed at an onsite acid leach and precipitation treatment plant to produce, on average, 1,360 tonnes of uranium oxide concentrate (UOC) per year over the life of the Project.

The MRUP was approved by the Minister for Environment on the 16 December 2016 with the release of Ministerial Statement No. 1046 which outlines conditions (17 in total) for the Project. Federal environmental approval (EPBC 2013/7083) was granted on the 2 March 2017. Figure 1 shows the approved MRUP.

1.2 Purpose and objectives of Compliance Assessment Plan

The CAP will be used by Vimy and Department of Water and Environmental Regulation (DWER; formerly the OEPA) to ensure documentation which supports and verifies the compliance status of the implementation conditions of Statement 1046 and/or procedures of the Statement are recorded and retained to facilitate assessment and determination of compliance and inform these processes.

The Compliance Assessment Plan (CAP) is required under condition 4 of Statement 1046. The purpose of the CAP is to comply with conditions 4-1 to 4-6, as detailed below.

4 Compliance Reporting

4-1 *The proponent shall prepare, submit and maintain a Compliance Assessment Plan to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation, whichever is sooner.*

4-2 *The Compliance Assessment Plan shall indicate:*

1. *The frequency of compliance reporting;*
2. *The approach and timing of compliance assessments;*
3. *The retention of compliance assessments*
4. *The method of reporting of potential non-compliances and corrective actions taken;*
5. *The table of contents of Compliance Assessment Reports; and*
6. *Public availability of Compliance Assessment Reports.*

- 4-3 *After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2 the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.*
- 4-4 *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.*
- 4-5 *The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.*
- 4-6 *The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or otherwise agreed in writing by the CEO.*

The Compliance Assessment Report shall:

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

1.2.1 Compliance Assessment Plan guidelines

This CAP has been prepared in accordance with advice from DWER and the following Guidelines:

- *Post Assessment Guideline for Preparing a Compliance Assessment Plan (OEPA 2012a)*
- *Post Assessment Guideline for Preparing an Audit Table (OEPA 2012b)*
- *Post Assessment Guideline for Making Information Publicly Available (OEPA 2012c)*

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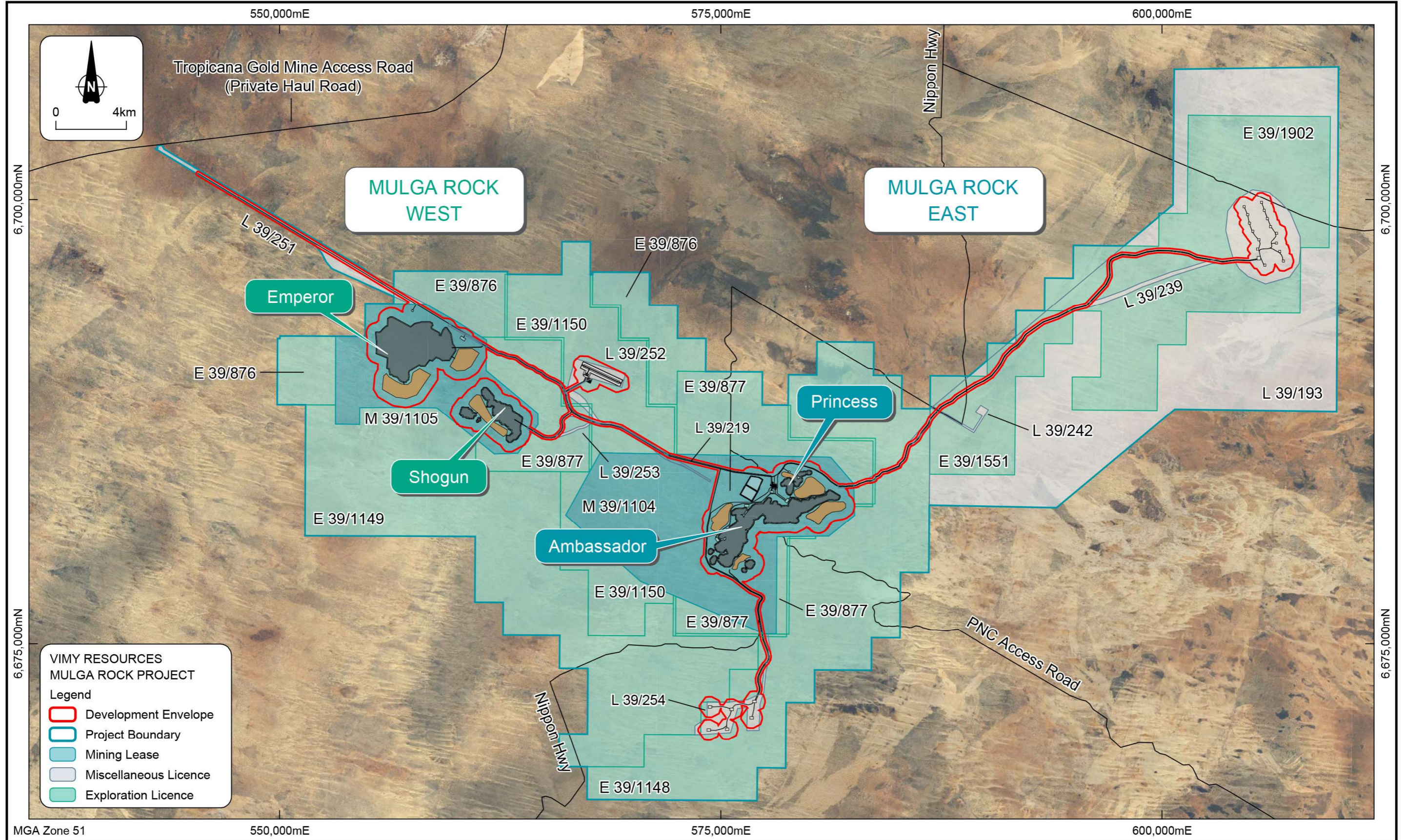


Figure 1 : Project Development Envelope and Project Boundary

2. Compliance Assessment Plan (CAP)

2.1 Approach and timing of compliance assessments

2.1.1 Approach

Information addressing compliance against each condition specified in Statement 1046 is provided in the Audit Table (Section 2.5; Appendix 1). This audit table documents:

- How compliance will be achieved
- What evidence will be available to confirm compliance
- When compliance information is to be collected
- Timeframes for compliance reporting

In addition,

Conditions 8 to 16 of the Statement require that Vimy prepare and submit Condition Environmental Management Plans (CEMP's) to the CEO of the OEPA. These CEMP's outline:

- The information to be collected (contents of the CEMP's)
- The methods to be used to determine the criteria / targets have been met
- Assessment timing and frequency of compliance reporting
- Contingency actions in case of any exceedance(s)
- Review periods

A list of the CEMP's to be prepared for the MRUP, prior to commencement of substantial works, is provided in Table 1.

Table 1: Required Management Plans

Condition	Monitoring and Management Plan	Status
8 and 9-2	Flora and Vegetation	Under review by DMA's
10-2	Terrestrial Fauna	Under review by DMA's
11-2	Aboriginal Heritage	Under review by DMA's
12-2	Groundwater	Under review by DMA's
13-2	Soil (outcome based)	Under review by DMA's
14-2	Soil (objective based)	Under review by DMA's
15-2	Tailings Storage Facility	Under review by DMA's
16-2	Above Ground Tailings Storage Facility	Under review by DMA's

2.1.2 Frequency and Timing of Reporting

Vimy will continuously assess its compliance with Statement 1046 and report on compliance annually in the Compliance Assessment Report (CAR). Statement 1046 was issued on the 16 December 2016, with the first

CAR due (in accordance with condition 4-6) 15 months from the date of issue. The CAR will address the 12-month period from date of issue and then annually from the date of submission of the first compliance assessment report.

The first CAR will address the compliance period 16 December 2016 to 15 December 2017 and will be submitted to the CEO of the OPEA by 16 March 2018. Subsequent CAR's will cover the period 16 December to 15 December with each report submitted by the annual date of 16 March following the conclusion of the reporting period.

2.2 Retention of Compliance Assessment Reports

In compliance with condition 4-4 of Statement 1046 Vimy will retain reports of all compliance assessments and shall make those reports available when requested by the CEO. Records will be kept in accordance with the relevant record keeping legislation including

- *State Records Act 2000*
- *Electronic Transactions Act 2011*
- *Freedom of Information Act 1992*
- *Evidence Act 1906*

2.3 Reporting of potential non-compliances and corrective measures

As outlined in condition 4-5 of Statement 1046, potential non-compliances will be reported to the CEO within seven days of that non-compliance being known. Serious potential non-compliances will initially be reported with a phone call and administrative potential non-compliances will be initially reported via email. All reported potential non-compliances will be followed up with a letter and report within seven days of the phone call or email.

The potential non-compliance letter or report will include the following:

- Date of potential non-compliance
- The extent of and impacts associated with the potential non-compliance, where applicable
- The precise location of the potential non-compliance
- The cause of the potential non-compliance
- Any preventative measures in place to prevent the potential non-compliance before it occurred and what if any amendments that have been made to prevent re-occurrence of the potential non-compliance.

Potential non-compliances and all corrective and preventative actions implemented will be described in the Audit Results section of the annual CAR. The CAR will include a statement as to whether Vimy has complied with the conditions outlined in Statement 1046 and required CEMP's and will be endorsed by Vimy's Chief Executive Officer or a person delegated to sign on the Chief Executive Officers behalf. The compliance statement will be written in accordance with the OEPA *Post Assessment Form for a Statement of Compliance*.

2.4 Public availability of Compliance Assessment Reports

Vimy will make CARs publicly available in accordance with condition 5 of Statement 1046 and with the OEPA *Post Assessment Guideline for Making Information Publicly Available* (OEPA 2012c).

2.5 Audit Table

As a requirement of the CAR's, an audit table for Statement 1046 will be prepared and maintained in accordance with the OEPA's *Post Assessment Guideline for Preparing an Audit Table* (OEPA 2012b).

The Audit Table has been prepared based on the draft table supplied by the OEPA and is presented in Appendix 1.

2.6 CAR table of contents

As required by condition 4-2 (5) of Statement 1046 the CAP shall include a table of contents for Compliance Assessment Report.

The proposed table of contents is presented in Table 2, it is based on the OEPA's *Post Assessment Guideline for Preparing a Compliance Assessment Report* (OEPA 2012d).

Table 2: Table of Contents for CAR

Table of Contents Heading	Description
1. Introduction	Brief details about the project. The Statement number and the period of time (inclusive of start and end date) covered by the CAR must be included.
2. Implementation status	Summary of the proposal's implementation status and summary of any issues that may have arisen and any major project milestone achievements that may have been met in the reporting period
3. Statement of Compliance	Include a Statement of Compliance prepared in accordance with and provide all information required by the OEPA's Post Assessment Form for a Statement of Compliance.
4. Details of declared compliance status 4.1 Monitoring and Management Plans 4.2 Supporting information 4.3 Raw data	Audit Table: Include details of the declared compliance status of each condition, monitoring and management plan and or procedure of the Statement. Details must demonstrate that each declaration is accurate and details of what criteria were to be met, whether they were met and sufficient information to support conclusions.
5. Proposed Changes	If applicable
Appendices	As required

3. References

OEPA (2012a). *Post Assessment Guideline for Preparing a Compliance Assessment Plan*, Post Assessment Guideline No. 2, Office of the Environmental Protection Authority, Perth, August 2012

OEPA (2012b), *Post Assessment Guideline for Preparing an Audit Table*, Post Assessment Guideline No. 1. Office of the Environmental Protection Authority, Perth, August 2012.

OEPA (2012c), *Post Assessment Guideline for Making Information Publicly Available*, Post Assessment Guideline No. 4. Office of the Environmental Protection Authority, Perth, August 2012.

OEPA (2012d), *Post Assessment Guideline for Preparing a Compliance Assessment Report*, Post Assessment Guideline No. 3. Office of the Environmental Protection Authority, Perth, August 2012.



Appendix 4

Compliance Assessment Plan Letter of Approval



Our ref: DWERDA-009865
Enquiries: Hugh Lance, Ph 6364 6484

Mr Adam Pratt
Environment, Health and Safety Manager
Vimy Resources Limited
PO Box 23
WEST PERTH WA 6005

Dear Mr Pratt

**MINISTERIAL STATEMENT 1046– CONDITIONS 4-1 & 4-2 –
COMPLIANCE ASSESSMENT PLAN**

Thank you for your email dated 18 September 2017 submitting the Mulga Rock Uranium Project Compliance Assessment Plan (CAP) to the Department of Water and Environmental Regulation (DWER), as required by Conditions 4-1 and 4-2 of Ministerial Statement 1046.

DWER has reviewed the CAP and determined that the CAP meets the requirements of Conditions 4-1 and 4-2 of Ministerial Statement 1046.

DWER notes that several Environmental Management Plans (EMPs) are required to be approved prior to implementation. Vimy Resources Limited is advised that the CAP should be updated following approval of the EMPs to include further detail on how monitoring data will be analysed and validated to confirm compliance with the requirements of Ministerial Statement 1046.

As per condition 4-6 of Ministerial Statement 1046, your first Compliance Assessment Report is due by **16 March 2018**.

Yours sincerely

Stuart Cowie
EXECUTIVE DIRECTOR
COMPLIANCE AND ENFORCEMENT

2 October 2017