

DEEP YELLOW LIMITED

Compliance Assessment Report

16 December 2021 to 15 December 2022

MS 1046

16 March 2023

Document Revision History

This table shows approvals or significant changes to this document for circulation and use by Deep Yellow Staff & Contractors.

Revision Number	Author	Reviewed	Approved	Date	Description	Next Review
A	Niv Reddy	Cathy Paxton	Gill Swaby	16/03/2023	N/A	N/A

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1. INTRODUCTION

Vimy Resources Limited (ABN 56 120 178 949) (**Vimy**) is developing the Mulga Rock Uranium Project (**MRP; the Project**) located in Western Australia. The MRP is located 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 of the Mulga Rock Project, and the registered holder of the tenements associated with the Project, is Narnoo Mining Pty Ltd (ABN 81 084 713 100) (**Narnoo**). Narnoo is a 100% owned subsidiary of Vimy. Vimy is the Proponent for the Ministerial approval under the Environmental Protection Act 1986 (EP Act) (WA), and the Commonwealth Ministerial approval under the Environmental Protection and Biodiversity Act, 1999 (**EPBC Act**). Vimy is a 100% owned subsidiary of Deep Yellow Limited (ABN 97 006 391 948) (**Deep Yellow**). Deep Yellow is listed on the Australian Securities Exchange and is the ultimate holding company in the Deep Yellow group of companies, which includes Vimy and Narnoo.

The State of Western Australia granted Ministerial Approval under s.45(5)(b) of the EP Act (1986) in December 2016, Ministerial Statement No. 1046 (**MS 1046**). The Australian Federal Government (then Department of the Environment and Energy and now known as the Department of Climate Change, Energy, the Environment and Energy) granted final approval under s.133 of the EPBC Act (1999) in March 2017 (**EPBC 2013/7083**). The assessment process was undertaken under a bilateral agreement between the State of Western Australia and the Commonwealth Government.

The MRP is the largest advanced uranium project in Australia with an Ore Reserve of 22.7Mt at 845ppm U_3O_8 for 42.3Mlb U_3O_8 . The Ore Reserve is a subset of the Mineral Resource which stands at 71.2Mt at 570ppm U_3O_8 for a contained 90.1Mlb U_3O_8 at a cut-off of 150ppm 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, the majority 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 2,180 t/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 progressive rehabilitation resulting in a small disturbance footprint at any given time and significant savings in waste rock movement and rehabilitation costs.

Under the approval conditions of MS 1046 Vimy is required to submit to the CEO of the Department of Water Environment and Regulation (DWER) 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. This is the 6th CAR report submitted and covers the reporting period from 16 December 2021 to 15 December 2022 (reporting period).

This CAR has been prepared in accordance with the *Post Assessment Guideline for Preparing a Compliance Assessment Report (OEPA, 2012)* (refer to Section 6.1).

2. IMPLEMENTATION STATUS

Implementation of the MRP commenced on 10 December 2021 with works including topsoil, subsoil and overburden stripping.

Notification of substantial commencement was provided to DWER on 25 November 2021 and 15 December 2021 as required by condition 3-2 of MS 1046. Substantial commencement of the Project was acknowledged by DWER on 16 December 2021.

Key disturbance activities carried out during the 2022 reporting period and their status are provided in Table 1.

Table 1: MRP Key Characteristics Status as of 15 December 2022

Element	Description	Status / Comment
Disturbance Footprint.	The Development Envelope (DE) for the Project covers an area of 9,998 ha. Within the DE, Vimy proposes to disturb up to 3,787 ha (Disturbance Footprint).	Disturbance Footprint: 279 ha.
Open cut mine pits.	Clearing of no more than 2,374 ha within the 9,998 ha DE	Open Cut Mine Pit stripping disturbance: 180 ha
Associated Infrastructure.	Clearing of no more than 1,307 ha within the DE.	Disturbance: 99ha for roads, pipeline, topsoil stockpiles.
Backfilling of mine pits with waste as part of progressive rehabilitation.	Backfilling of pits to a height of at least 10 m above the water table.	Not required at this stage of the project.
Above-ground TSF.	Clearing of no more than 106 ha within the DE.	Disturbance tracked and recorded via GDAP process. No. clearing undertaken for the TSF.
Tailings disposal.	Disposal of no more than 3 Mtpa of beneficiation rejects and no more than 2 Mtpa of post-leaching tailings material.	Not in progress.
Water abstraction.	Up to 3 GL / annum.	11601 kL.
Mine dewatering.	Up to 2.5 GL / annum.	Not in progress.
Water reinjection.	Up to 1.5 GL / annum.	Not in progress.

3. STATEMENT OF COMPLIANCE

During this reporting period, Vimy was compliant with all ministerial conditions associated with MS 1046. A Statement of Compliance has been prepared in accordance with the OEPA's Post Assessment Form and is presented as Appendix 1.

Vimy will make CARs publicly available in accordance with condition 5 of MS 1046 and with the OEPA *Post Assessment Guideline for Making Information Publicly Available* (OEPA, 2012a) (refer to Section 6.3).

3.1 Details of Declared Compliance Status

The declared compliance status of each condition is presented in the MRP Statement No. 1046 Audit Table presented as Appendix 2.

3.2 Monitoring and Management Plans

Conditions 6 and 7 of MS 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 EPA Service Unit for the CEO.

- Aboriginal Heritage Management Plan – approved 3 January 2019.
- Above Ground Tailings Storage Facility Monitoring and Management Plan - approved 7 April 2021.
- Flora and Vegetation Monitoring and Management Plan - approved 20 February 2020.
- Groundwater Monitoring and Management Plan – approved 6 May 2020.
- Soil Monitoring and Management Plan (Management-based) – approved 1 September 2020.
- Soil Monitoring and Management Plan (Outcome-based) – approved 1 September 2020.
- Tailings Storage Facility Monitoring and Management Plan – approved. 28 August 2020.
- Above Ground Tailings Storage Facility Monitoring and Management Plan – approved 7 April 2020.
- Terrestrial Fauna Monitoring and Management Plan – approved 20 February 2020.

All CEMPs were written in accordance with the *“Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans”* (EPA, 2016) (refer to Section 6.2). All CEMPs were made publicly available utilising the OEPA (2012a) *“Post Assessment Guideline for Making Information Publicly Available, Post Assessment Guideline No. 4”*. (OEPA, 2012b) (refer to Section 6.3).

3.3 Supporting Information

Supporting information for the CAR is presented in Appendices 1 to 5. The Compliance Assessment Plan from 2017 and the associated letter of approval are presented as Appendix 3 and 4, respectively.

4. ENVIRONMENTAL MONITORING AND MANAGEMENT

During the reporting period groundwater, soil sampling, vegetation condition and fauna monitoring programs were undertaken. Analysis and results from specific monitoring programs undertaken during this reporting period are reported in the Environmental Monitoring Report for calendar year 2022 appended to the Department of Mines, Industry Regulation and Safety (DMIRS) Annual Environmental Report (AER).

4.1 Groundwater Monitoring

Ground disturbing activities associated with the construction of the MRP continued during the reporting period, however, there have been no discharges to land or water as a result of substantial commencement of works.

Monitoring bores have been installed at the site and a monitoring programme undertaken for water levels and quality. The groundwater monitoring results are presented in the Environmental Monitoring Report for calendar year 2022.

4.2 Soil Monitoring

Soil sampling was conducted in March and November 2022.

To maintain soil quality in Sandhill Dunnart (SHD) Habitat as per commitment 13-1 of MS 1046, initial soil sampling of EC, pH and metals was undertaken in vegetation community E3 and S6. Baseline samples were taken at 20 locations to determine the average surface soil quality in the approximate areas where roads intersect SHD Habitat.

Soil monitoring results are detailed in the Environmental Monitoring Report for calendar year 2022.

Table 2: Soil Monitoring Commitments and Compliance

Monitoring Requirement	Results / Comments	Compliant	Evidence
Salinity			
Initial sampling of EC, pH, and metals to take place in vegetation community E3 and S6 areas in close proximity to where infrastructure (roads) will be built just prior to their construction.	20 samples were taken from established locations along the line of proposed roads to establish a baseline.	Yes	Soil samples laboratory results are presented in the Environmental Monitoring Report for calendar year 2022.
Acidity			
Soil sampling for pH levels and metal concentration of Zinc, Nickel, Copper, Cobalt and Uranium (or earlier if EC sampling indicates that there is a potential problem).	20 samples were taken from established locations along the line of proposed roads.	Yes	Soil sample laboratory results are presented in the Environmental Monitoring Report for calendar year 2022
Metals			
Additional sampling of metal concentrations if trigger levels exceeded. Soil sampling for pH levels and metal concentration of Zinc, Nickel, Copper, Cobalt and Uranium (or earlier if EC sampling indicates that there is a potential problem).	20 samples were taken from established locations along the line of proposed roads.	Yes	Soil sample laboratory results are presented in the Environmental Monitoring Report for calendar year 2022.

Monitoring Requirement	Results / Comments	Compliant	Evidence
Surface soil sampling (0 - 10 cm) will take place adjacent to areas where dust suppression spray has most frequently been utilised.	20 samples were taken from established locations along the line of proposed roads to establish a baseline.	Yes	Environmental Monitoring Report for calendar year 2022.

4.2.1 Flora and Vegetation Monitoring

Vegetation monitoring has been ongoing at the MRP since 2007 to provide baseline data. In 2009, 2010 and 2015 permanent plots were established to measure direct impacts to vegetation communities and the effectiveness of future rehabilitation efforts. A flora and vegetation assessment was undertaken in December 2014 at the MRP by Mattiske Consulting, which detailed locations of long-term monitoring plots to determine vegetation condition.

Vegetation trials were set up in 2017 for seven rehabilitation monitoring areas each with a different substrate (three at the East GIT and four at the West GIT excavation trenches) east of the Mulga Rock Camp. Within each of these seven areas there were two 20 x 24 m plots, one with topsoil and one without.

Each plot was then further split into four 4 x 18m treatments with a 2-metre gap between each treatment. These treatments consisted of different seed mixes:

- general and fire species (+G+F);
- general species only (+G-F);
- fire species only (-G+F); and
- no seeding (-G-F).

Vimy Resources commissioned 360 Environmental (part of SLR Consulting) Pty Ltd (**360 Environmental**) in August 2022 to undertake an assessment of the Ambassador Resource Rehabilitation Trials within the MRUP. The 2022 trial assessment recorded twenty-eight taxa, with plants present in 25 of the 28 topsoil sites. The results of the 2022 vegetation monitoring programme will be summarised in the Environmental Monitoring Report for the calendar year 2022.

The sites without topsoil added were found to be largely devoid of any vegetation. The 'Eocene substrate +G' and 'Calcrete substrate +G' treatments made up seven of the ten most species-rich sites, and the highest number of species was recorded at one of the 'Calcrete substrate +G' sites. The +G sites generally contained higher species richness than the -G sites, however several -G sites had been successfully colonized by voluntary growth species. *Acacia helmsiana* and *Triodia* sp. were two voluntary growth species regularly recorded and were also the most recorded Species. Healthy saplings and shrubs of Eucalyptus and Acacia species included in the trial general seed mixture (+G) were recorded the majority of the 14 +G treatment sites but was largely absent from the -G treatments. No introduced species were recorded. Flora and vegetation monitoring commitments are provided in Table 3.

Table 3: Flora and Vegetation Monitoring Commitments

Monitoring Requirement	Results / Comments	Compliant	Evidence
Clearing			
Annual audit of cleared / disturbed areas recorded in the Ground Disturbance Activity Permit (GDAP) system against approved DE boundary.	Audit was undertaken of cleared/disturbed areas recorded in the GDAP system. All cleared/disturbed areas were reviewed and approved as being within the DE boundary.	Yes	Approved GDAP applications Survey report.
Annual audit of cleared/disturbed areas in the GDAP system against approved Disturbance Footprint area. This annual audit will include drone surveys and on the ground checks to ensure any disturbance aligns with what was authorised through the GDAP process.	Drone was deployed at site during June 2022 and during January 2023. All cleared/disturbed areas approved under the GDAP system were aligned with the drone survey and on the ground checks.	Yes	Survey report, drone survey photos and GDAP Applications.
On the ground checks will include vegetation monitoring around soil monitoring locations which will be undertaken at the same time as the soil checks.	Vegetation assessments were undertaken during soil sampling no weeds were observed and vegetation condition is excellent – pristine.	Yes	Vegetation Assessment Report.
Before GDAP authorisation will be given the area scheduled for clearance will be checked to determine whether the proposed disturbance area contains E3 and/or S6 vegetation communities and for the presence of conservation significant flora species (CSFS). A record will be kept of any E3/S6/CSFS that could not practically be avoided as well as any disturbance that was avoided as a result of amending the proposed clearance area.	During this reporting period all ground disturbance was approved through the GDAP process. No disturbance occurred outside of approved GDAP areas.	Yes	Approved GDAP applications.
Annual assessment of aerial photography.	Drone was deployed at site during June 2022 and during January 2023.	Yes	Drone photography.
Annual audit of induction records.	Induction records are completed and up to date concerning clearing of flora and vegetation.	Yes	Induction records.
Annual audit of training records	Training records were completed and up to date concerning clearing of flora and vegetation.	Yes	Training records.
Annual assessment of site record books and / or shift records recording number of days mining suspended due to extreme winds.	No activities suspended due to extreme winds.	Yes	Site record books.

Monitoring Requirement	Results / Comments	Compliant	Evidence
Dust			
Annual assessment of dust monitoring results.	Dust monitoring was undertaken during the reporting period. These results are presented in the Environmental Monitoring Report Calendar year 2022.	Yes	Environmental Monitoring Report Calendar year 2022.
Annual audit of 'open' or exposed / cleared surfaces recorded in GDAP system and comparison with active operational areas.	Disturbed areas were audited against GDAP applications and drone imagery. The MRP is currently in the construction phase.	Yes	Approved GDAP applications.
Annual reconciliation of 'cleared (open)', 'rehabilitated (closed)', operational areas.	Ground disturbance footprint reported in DMIRS AER and MRF report.	Yes	DMIRS AER and MRF report.
Annual assessment of dust monitoring results. Any excessive dust deposition recorded that could not be explained by variations in background dust deposition rates as measured in g/m ² /month would be investigated for the root cause.	Dust monitoring was undertaken during the reporting period.	Yes	Dust monitoring results.
Annual assessment of site record books and / or shift records recording number of days mining suspended due to extreme winds.	NA – NO shifts suspended due to excessive winds.	Yes	Site record books.
Annual audits of training records.	Training records were completed and up to date concerning dust.	Yes	Training records.
Saline Water			
Annual audit of GDAP records which require dust suppression activities using saline water, including controls, to be authorised.	Dust suppression was undertaken during the reporting period during campaign drilling programs. All dust suppression is being undertaken in accordance with the Flora and Vegetation Monitoring and Management Plan.	Yes	Visual inspections for overspray. Water cart training/competency and operator records.
Annual audit of induction records.	Induction records were completed and up to date concerning dust suppression.	Yes	Induction records.
Annual audits of training records and operator records.	Dust suppression was undertaken during the reporting period during campaign drilling programs.	Yes	Training/competency records and operator records.
Annual audit of shift records and / or fleet management data to establish	Dust suppression activities undertaken	Yes	Fleet Management records.

Monitoring Requirement	Results / Comments	Compliant	Evidence
correct machinery was used for dust suppression.	during drilling campaigns.		
Weeds			
Annual reconciliation of cleared (open), rehabilitated (closed), and operational areas.	Rehabilitation trial assessments undertaken.	Yes	Vegetation assessment reports.
Annual audit of Weeds and Seeds Clearance Permits and reconciliation against vehicles entering the MRP.	Machinery inspection records are complete.	Yes	Machinery inspection records.
Annual monitoring of existing permanent vegetation quadrats to identify any increase in number of weeds within the MRP.	Long-term monitoring plots were assessed (2022) to determine weed % coverage. These results are presented in the Environmental Monitoring Report for Calendar year 2022.	Yes	Environmental Monitoring Report Calendar year 2022.
Annual audits of induction records.	Induction records were completed and up to date concerning flora, vegetation and weeds.	Yes	Induction records.
Annual audit of Sentinel Hotspots and comparison with pre-mine fire regime.	Audit of Sentinel Hotspots was undertaken to compare with pre-mine fire regime.	Yes	Sentinel Hotspots.
Annual audit of GDAP records which require that controls are in place to protect against starting a fire.	GDAP records detailed controls to protect against fires.	Yes	GDAP records/audits.
Annual audit of Emergency Response Procedures (ERPs) to ensure update and implemented across the MRP.	ERPs were reviewed. The ERPs are current and being implemented across the MRP.	Yes	ERP.

4.2.2 Fauna Monitoring

To monitor the presence of the Sand Hill Dunnarts (SHD), Vimy established a camera trap monitoring program in 2014 for the MRP and surrounding areas in the Mulga Rock region of the Great Victoria Desert (GVD). Historic and current SHD fauna monitoring is discussed in sections 4.2.3 and 4.2.4.

Monitoring required during this reporting period, to minimise direct and indirect impacts on conservation significant fauna species, is provided in Table 4.

Data summary for camera monitoring locations is provided in Appendix 5.

Table 4: Fauna Monitoring Commitments

Monitoring Requirement	Results / Comments	Compliant	Evidence
Annual audit of cleared / disturbed areas recorded in the GDAP system against approved Development Envelope boundary.	GDAPs are reviewed before being issued for any requested disturbance. Cleared / disturbed areas recorded in the GDAP were	Yes	Approved GDAP applications.

Monitoring Requirement	Results / Comments	Compliant	Evidence
	reviewed to ensure all issued applications were within the DE boundary.		
Annual audit of authorised versus actual cleared areas and of the requirements of Condition 9-1 (1) & (2).	Drone was deployed during June 2022 – and January 2023. Drone footage was reviewed against the approved GDAP applications to ensure actual cleared areas were within application approval areas.	Yes	Survey report, drone footage and approved GDAP applications.
Annual assessment of aerial photography.	Drone was deployed during June 2022 and During January 2023. Drone footage was reviewed and assessed.	Yes	Drone footage June 2022 and– January 2023.
Monitoring and annual audit of whether environmental inductions have taken place will be affected through induction records that will be created each time new personnel are inducted.	Induction records were completed and up to date regarding environmental inductions.	Yes	Induction records.
Monitoring and annual audit of whether personnel involved in clearing vegetation have been trained on GDAP processes will be affected through the signing of training records testifying that the training has been completed and been understood.	Training records were completed and up to date regarding clearing vegetation and GDAP processes.	Yes	Training records.
The creation of an open source of water will involve activities that require pre-authorisation through the GDAP system. The GDAP system will require that the authorisation required to create an open source of water includes suitable fencing to prevent fauna entry into the area. As such the monitoring is continuous and triggered prior to such activity. Annual audit of Compliance Records stored in the GDAP system.	A fenced Turkeys nest for storage of water is present on site. Audit of Compliance Records in the GDAP system was undertaken.	Yes	Approved GDAP applications. Turkeys nest is fenced, preventing access to fauna.
Where open water sources (fenced) are remote from daily activities, inspection frequency will be aligned with risk. Initial inspections will be weekly, and frequency will subsequently be increased or decreased depending on observations concerning the effectiveness and durability of the fencing. Annual audit of Compliance Records stored in the GDAP system.	A fenced Turkeys nest is present on site. An audit of Compliance Records in the GDAP system was undertaken.	Yes	Approved GDAP applications. Turkeys nest is fenced, preventing access to fauna.

Monitoring Requirement	Results / Comments	Compliant	Evidence
Any impact to Conservation Significant Fauna (CSF) will be reported to the registrar of the on-site register. Annual audit of CSF Impact Register.	CSF Impact Register has been implemented.	Yes	No CSF impacts were reported.
Monitoring of whether environmental inductions have taken place will be affected through induction records that will be created each time new personnel are inducted. That monitoring process will include inductees confirming that they have received relevant training in the identification of CSF. Annual audit of induction records.	Induction records were reviewed to ensure environmental issues such as CSF identification have been addressed.	Yes	Induction records.
Containment of food sources will be regularly monitored and maintained to ensure they are fit-for-purpose and functioning appropriately. Initial inspections will be weekly, and frequency will subsequently be increased or decreased depending on observations concerning the effectiveness and durability of the fencing. All potential food sources, in addition to being checked to ensure that protection measures to prevent access by feral animals are in place and effective, will also be monitored continuously by cameras with the captured images downloaded and analysed on a quarterly basis.	Photos were downloaded during the reporting period and in February 2023 and feral animal presence analysed from Sandhill Dunnart Camera monitoring. The results are presented in the GHD Technical memorandum Sandhill Dunnart and Feral Species Image Analysis. Food sources are contained in the camp and food wastes are disposed and covered in an on-site landfill facility.	Yes	GHD Technical memorandum Sandhill Dunnart and Feral Species Image Analysis.
Fencing of open water sources, accessible to terrestrial fauna, will be regularly monitored and maintained to ensure they are fit-for-purpose and functioning appropriately. All potential water sources, in addition to being checked to ensure that protection measures to prevent access by feral animals are in place and effective, will also be monitored continuously by cameras with the captured images downloaded and analysed on a quarterly basis.	Photos were downloaded during the reporting period and in February 2023 and results will be presented in the next CAR. Feral animal presence was not observed near water sources.	Yes	Camera trap photos Feral Animal Register – none recorded during reporting period. Turkeys nest fenced.
The recording of any sighting of feral animals is a	Daily pre-start reports identify feral animal sightings, which	Yes	Feral Animal Register – none

Monitoring Requirement	Results / Comments	Compliant	Evidence
continuous process with site personnel required to report such sightings as soon as is reasonably practicable and expected to be on the same day as any sighting. Annual audit of on-site Feral Animal Register.	are then included in the Feral Animal Register.		recorded during reporting period.
Camera traps will be active continuously once installed and the information recorded will be downloaded with a frequency determined by storage capacity and battery life and likely to be at least every 3 months. Quarterly review of camera trapping results to determine performance and identify if new locations should be established.	Photos were downloaded during the reporting period and in February 2023, results and analysis for 2022 will be presented in the next CAR.	Yes	GHD Technical memorandum Sandhill Dunnart and Feral Species Image Analysis.
Annual review of the camera trapping results to determine performance and confirm that the management target and environmental objective is being met.	Review of camera trapping results for 2022 will be presented in the next CAR.	Yes	GHD Technical memorandum Sandhill Dunnart and Feral Species Image Analysis.
Annual audit of Sandhill Dunnart Register.	SHD were sighted during the reporting period in 375 discreet events. SHD Register was reviewed. Results is presented in GHD Technical Memo.	Yes	GHD Technical memorandum Sandhill Dunnart and Feral Species Image Analysis. .
Monitoring of whether environmental inductions have taken place will be affected through induction records that will be created each time new personnel are inducted. That monitoring process will include inductees confirming that they have received relevant training on matter related to the SHD. Annual audit of induction records.	Induction records were reviewed and up to date concerning relevant training related to SHD.	Yes	Induction records.

4.2.3 Historic SHD Monitoring Results

Starting in 2014 Vimy established a camera trap monitoring program for the MRP and surrounding areas in the Mulga Rock region of the GVD. The purpose of the program was to identify taxa and determine the presence / absence of Sandhill Dunnart (*Sminthopsis psammophila*)(SHD). The program included the capture of digital images from infra-red cameras, which were subsequently analysed, and taxa identified by a suitably qualified ecologist with specialist experience in small mammal (e.g., *Dasyuridae*) identification in the GVD. As part of the monitoring program, three separate programs have been undertaken including a trial program, the Mulga Rock main area program and a regional program.

The trial programme was undertaken from July to September 2014. During the trial two types of cameras were used, the Reconyx 550 Hyperfire white flash and the Bushnell motion infrared camera. The trial was limited to the proposed Mulga Rock Project operational area with eight sites established in the field. The 2014 trial programme did not record any SHD.

At the conclusion of the trial, the Mulga Rock main area programme was commenced with 15 new sites established in the Mulga Rock Project operational area from September 2014 to November 2015. Data from these sites was collected using Reconyx 550 Hyperfire white flash cameras. Five SHD events were recorded at camera MR11a in January 2015, three separate events at camera MR14a in March and April 2015 and one event at camera MR5a in August 2015. The three events from MR14a are likely to be the same individual moving within its home area and appears to be an adult. The MR11a individual appears slightly smaller and is likely a 2014 offspring not yet fully grown.

In November 2015 a regional programme was commenced with 23 sites established in areas identified as prime SHD habitat and where SHD had been previously recorded. Data were collected using Reconyx 550 Hyperfire white flash cameras from November 2015 to August 2018. During this time, two sites were unable to be monitored due to fire damage or camera theft.

From the images analysed from the Mulga Rocks main programme and regional programme prior to July 2017, approximately 10,644 had a small mammal present, with the remaining 212 images excluded from this assessment due to being too difficult to determine confidence or having no animal present. Eleven species were identified from the images, this included ten native mammals and one introduced mammal from all the camera trapping projects.

4.2.4 Current SHD Monitoring

The preparation of a Sandhill Dunnart Conservation Plan (**SHDCP**) is required under Condition 2 of the EPBC 2013/7083 approval, to reduce the impact to the SHD posed by feral animals within the defined area. The SHDCP is based around a 6,000-ha defined area of land which contains suitable SHD habitat. In order to implement the SHDCP an understanding of the presence / absence of the SHD and feral animals needs to be established. Once baseline data have been collected and interpreted, management actions can be implemented to reduce the threat to the SHD posed by feral animals.

4.2.5 SHD Monitoring Results

To support the SHDCP a field survey was undertaken in November 2021, where 25 remote camera sites were established within the defined area.

Images analysed from the Mulga Rocks main programme between late November 2021 and mid-August 2022, (a period of approximately 260 days), the SHD was identified on 42 remote camera devices across 23 sites providing 375 discreet events. Only two sites of the 25 did not record SHDs, which infers there is a good representative population of Sandhill Dunnarts persisting

within the defined area. This data will form part of the annual reports to satisfy Condition 4 of MS 1046 and Condition 6 of EPBC 2013/7083.

4.2.6 Aboriginal Heritage

The Development Envelope of the MRP occurs in an area with no determined Native Title Claim. There are two registered Aboriginal heritage sites within the Development Envelope, DAA 1985 (MINIGWAL2) and DAA1986 (MINIGWAL 3). Both are described on the heritage register as artefact/scatter sites and, as such, are archaeological sites (containing physical evidence of past activity). No registered ethnographic sites are located in the area.

To monitor impacts to these registered Aboriginal heritage sites, annual audits are required as detailed in Table 5.

Table 5: Aboriginal Heritage Monitoring Commitments

Monitoring Requirement	Results / Comments	Compliant	Evidence
Annual audit of authorised vs. actual cleared areas.	No approved GDAPS are near to the registered Aboriginal heritage sites.	Yes	Approved GDAP applications.
Annual audit of Heritage Site Access Register.	The registered Aboriginal heritage sites fall outside of the approved mining area. No work was conducted near the sites.	Yes	Approved GDAP applications.
Annual audit of Environment Incident Records.	Environment Incident Records were reviewed. No Environmental incidents occurred during the reporting period.	Yes	Environment Incident Records – none recorded during reporting period.
Annual audit of induction records.	Induction records were reviewed and up to date concerning Aboriginal heritage.	Yes	Induction records.
Annual audit of training records	Training records were reviewed and up to date concerning Aboriginal heritage.	Yes	Training records.

4.2.7 Raw Data

Data from the Sandhill Dunnart and Feral Species Image Analysis is presented in Appendix 5.

5. PROPOSED CHANGES

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

6. REFERENCES

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. *Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans” (EPA, 2016).*
3. *Post Assessment Guideline for Making Information Publicly Available, Post Assessment Guideline No. 4”. (OEPA, 2012b).*

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>	CAN: 120 178 949

2. Statement of Compliance Details

Reporting Period	16/12/21 to 15/12/22
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Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))			
Pre-construction	✓	Construction	✓
Operation		Decommissioning	

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	2
Attached to 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)		Yes (please proceed to Section 4)	✓

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

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 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: *M*

4. Proponent Declaration

I, Niv Reddy, Principal Environment

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: [Signature]

Date: 15/03/2023

Please note that:

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

5. Submission of Statement of Compliance

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

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

6. Contact Information

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

Manager, Compliance (Ministerial Statements)

Department of Water and Environmental Regulation

Postal Address: Locked Bag 10
Joondalup DC
WA 6919

Phone: (08) 6364 7000

Email: compliance@dwer.wa.gov.au

7. Post Assessment Guidelines and Forms

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

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

INITIALS: [Initials]

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.	The term 'In Process' may not be used for any purpose other than that stated in the Definition Column. The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).

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

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 rejects and no more than 2Mtpa of post-leaching tailings materials are discharged.</p>	<p><u>Open cut mine pits</u> Ground disturbance data will be reported to DMIRS (Annual Environmental Report – (AER) and DWER Compliance Assessment Report – (CAR) annually.</p> <p><u>Associated infrastructure</u> Ground disturbance data will be reported to DMIRS– (AER) and DWER (CAR) annually.</p> <p><u>Backfilling of mine pits</u> Survey data will be submitted annually to DMIRS (– AER) and DWER (CAR).</p> <p><u>Above-ground TSF</u> Ground disturbance data will be reported to DMIRS (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> Groundwater abstraction flow</p>	Overall	Within 7 days of awareness of any potential non-compliance.	C	<p><u>Open cut mine pits</u> 180 ha disturbance to date does not exceed 2,374ha within the 9,998ha Development Envelope.</p> <p><u>Associated infrastructure</u> 99ha of disturbance to date does not exceed 1,307ha within the 9,998ha Development Envelope.</p> <p><u>Backfilling of mine pits</u> Not required at this stage of the project</p> <p><u>Above-ground TSF</u> Not required at this stage of the project</p> <p><u>Tailings disposal</u> Not in progress.</p> <p><u>Water abstraction</u> Undertaken and reported in the</p>



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
			<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>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>				<p>CAR.</p> <p><u>Mine dewatering</u> Not required at this stage of project</p> <p><u>Water reinjection</u> Not required at this stage of project</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.	C	Vimy Resources Limited ABN 56 120 178 949: a) is now a wholly owned subsidiary of Deep Yellow Limited ABN 97 006 391 948; b) has not changed its name; and c) its new physical address is Level 1, 502 Hay Street, Subiaco, WA 6008 and its new postal address is PO Box 1770, Subiaco, WA 6904. DWER advised 29 September 2022
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.	CLD	On 26 November 2021, notification of substantial commencement was provided to DWER on 15 December 2021. DWER acknowledged substantial commencement of the project on 16 December 2021.
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 by providing the CEO with written evidence, on or before the expiration of five (5) years from the date of this Statement.	Provide written evidence of substantial implementation of the project to the CEO within 5 years of issue of the statement (16 December 2016).	Written correspondence to CEO containing copies of the Mining Proposal or Works Approval that the substantial work is being performed under and evidence in the form of photographs and an approved GDAP indicating that the work is substantial.	Construction	On or before 5 years from the date of this Statement	CLD	On 26 November 2021, notification of substantial commencement was provided to DWER on 15 December 2021. DWER acknowledged substantial commencement of the project on 16 December 2021.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
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 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	Pre-construction	6 months prior to the first CAR.	CLD	The CAP was submitted to DWER on 18 September 2017. The CAP was approved by DWER on 2 October 2017. The approved CAP has been attached in Appendix 3 of the Compliance Assessment Report (CAR). The CAP has been used as guide for preparing and submitting the 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.	Overall	Upon receipt of notice in writing from the CEO that the CAP satisfies requirements.	C	The CAP was submitted to DWER on 18 September 2017. The CAP was approved by DWER on 2 October 2017. The approval letter is attached in Appendix 4 of the CAR.
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 available when requested by the CEO.	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, Audit Table and CAR are all retained on Deep Yellow's network hosted on the cloud and backed up regularly.
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	No potential non-compliance during the reporting period, therefore no notifications to the CEO required.
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	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	C	The first CAR was submitted 15 months from the date of issue of the Statement which was the 14 March 2018.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>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:</p> <p>(1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf;</p> <p>(2) include a statement as to whether the proponent has complied with the conditions;</p> <p>(3) identify all potential non-compliances and describe corrective and preventative actions taken;</p> <p>(4) be made publicly available in accordance with the approved Compliance Assessment Plan; and</p> <p>(5) indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1.</p>				date of submission of the first CAR.		<p>The CARs have since been submitted by 16 March each year based on the approved CAP.</p> <p>The CAP and approval letter are presented in Appendix 3 and Appendix 4 of the CAR, respectively.</p>
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 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.	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.
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	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.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		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.						
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 (CEMP) 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.	CEMPs. Approval notice from the CEO.	Pre-construction	Prior to commencement of substantial works.	CLD	CEMPs have been prepared and submitted as per Statement No. 1046 conditions 13-1, 15-1 and 16-1. The CEMPs have been reviewed and approved by the EPA Services Division for the CEO. Substantial commencement of the project was acknowledged by DWER on 16 December 2021
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;	Prepare and submit CEMPs containing information specified in condition 6-2 of Statement 1046.	CEMPs Approval notice from the CEO.	Pre-construction	Prior to commencement of substantial works.	CLD	CEMPs have been submitted and approved by the EPA Services Division for the CEO prior to the commencement of substantial works. Substantial commencement of the project was acknowledged by DWER on 16 December 2021.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(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.						
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 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.	Implement the CEMPs that satisfy condition 6-2 for conditions 13-1, 15-1 and 16-1.	Approval notice from the CEO.	Overall	Prior to commencement of substantial works and throughout the life of the project.	C	Outcome-based CEMPs have been submitted and approved by the EPA Services Division for the CEO. Provisions of the CEMPs were implemented prior to the commencement of substantial works.
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	If monitoring indicates exceedance of either trigger and/or threshold criteria outlined in the CEMPs, 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.	NR	Environmental monitoring associated with the relevant CEMPs has been implemented. There have been no exceedances of proposed trigger and/or threshold criteria specified in the CEMPs.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>criteria and/or threshold criteria are being met and implementation of the trigger level actions and/or threshold contingency actions are no longer required;</p> <p>(3) investigate to determine the cause of the trigger criteria and/or threshold criteria being exceeded;</p> <p>(4) identify additional measures required to prevent the trigger and/or threshold criteria being exceeded in the future;</p> <p>(5) investigate to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded; and (6) provide a report to the CEO within ninety (90) days of the exceedance being reported.</p> <p>The report shall include:</p> <p>(a) details of trigger level actions or threshold contingency actions implemented;</p> <p>(b) the effectiveness of the trigger level actions or threshold contingency actions implemented, monitored and measured against trigger criteria and threshold criteria;</p> <p>(c) the findings of the investigations required by condition 6-4(3) and 6-4(5);</p> <p>(d) additional measures to prevent the trigger or threshold criteria being exceeded in the future; and</p> <p>(e) measures to prevent, control or abate the environmental harm which may have occurred.</p>						
1046:M6.5	Outcome-based Condition Environmental Management Plan	<p>The proponent:</p> <p>(1) may review and revise the Condition Environmental Management Plan(s), or</p> <p>(2) shall review and revise the Condition Environmental Management Plan(s) as and when directed by the CEO.</p>	Review and revise CEMPs as required.	<p>Written correspondence from the CEO.</p> <p>Revised Condition Environmental Management Plans.</p>	Overall	As required and/or as directed by CEO.	NR	<p>CEMPs have been submitted and approved by the EPA Services Division for the CEO.</p> <p>There has been no requirement to revise the CEMPs.</p>



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
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 CEMPs.	Copy of approval letter from CEO.	Overall	Implement the current confirmed and approved (by CEO) version of the Environmental Management Plans.	C	All relevant CEMPs were implemented prior to the commencement of substantial works.
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 CEMPs 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 objectives specified in conditions 9-1, 10-1, 11-1, 12-1 and 14-1.	CEMPs. Approval notice from the CEO.	Pre-construction	Prior to substantial commencement of work.	CLD	The management-based CEMPs have been submitted and approved by the EPA Services Division for the CEO.
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	Prepare and submit CEMPs to include required provisions	CEMPs Approval notice from the CEO.	Pre-construction	Prior to substantial commencement of work.	CLD	The CEMPs have been prepared, submitted and approved by the EPA Service Unit for the CEO, prior to the commencement of substantial works. The management-based CEMPs have been submitted and approved by the EPA Services Division for the CEO.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		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 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 CEMPs 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.	C	The CEMPs have been submitted and approved by the EPA Services Division for the CEO. All relevant CEMPs have been 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	If monitoring indicates exceedance of management target(s) outlined in the CEMPs, 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 21days of the exceedance being identified. Investigate cause of exceedance and provide a report to the CEO within 90 days of the exceedance being reported.	NR	Environmental monitoring, tests, surveys and investigations associated with the relevant CEMPs were implemented prior to the commencement of substantial works. There have been no exceedances of proposed trigger and/or threshold criteria specified in the CEMPs.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		being reported as required by condition 7-4(1). The report shall include: (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 CEMPs 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.	NR	Management actions outlined in the CEMPs were all implemented prior to the commencement of substantial works. There have been no exceedances of proposed trigger and/or threshold criteria specified in the CEMPs.



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 CEMPs as required.	Written correspondence. Revised Condition Environmental Management Plans.	Overall	As required or when directed by the CEO.	NR	The CEMPs were approved by the EPA Services Division for the CEO. There has been no requirement to revise the CEMPs.
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 CEMPs 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, and prior to commencement of ground disturbance.	C	The CEMPs were approved by the EPA Services Division for the CEO. The relevant CEMPs were implemented prior to the commencement of ground disturbing activities.
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 (FVMMP) so that the environmental outcomes specified in condition 8-1 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 FVMMP.	C	The approved FVMMP was implemented at the commencement of proposal implementation. Monitoring results are presented in the Environmental Monitoring Report for Calendar Year 2022 (DMIRS Annual Environmental Report (AER))
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 FVMMP 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 FVMMP	C	The approved FVMMP was implemented at the commencement of proposal implementation. Monitoring results are presented in the Environmental Monitoring Report for Calendar Year 2022 (DMIRS AER)
1046:M9.2	Flora and Vegetation (Objective based)	The proponent shall consult with Parks and Wildlife and prepare a Flora and Vegetation Monitoring	Consult with DBCA (formerly Parks and Wildlife) in the preparation of the FVMMP	Written and/or verbal correspondence from (Parks and Wildlife) DBCA.	Pre-construction	Prior to submitting the FVMMP to the CEO for approval.	CLD	The approved FVMMP was prepared in consultation with DBCA prior to submission to the



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		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.	before submission to the CEO for approval.					EPA Service Unit and 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.	The FVMMP to include the required provisions	Written approval from the CEO that the FVMMP addresses the requirements of condition 7.2 Compliance Assessment Report. Flora and Vegetation Monitoring and Management Plan. Monitoring Schedule.	Pre-construction	FVMMP	CLD	The FVMMP was approved by the EPA Service Unit for the CEO on 20 February 2020. The FVMMP was implemented at the commencement of proposal implementation.
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 FVMMP	Written correspondence from CEO	Overall	Once Proposal implementation commences.	C	The FVMMP was implemented at the commencement of proposal implementation. There has been no requirement to revise the FVMMP.
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 (TFMMP), so that the environmental objectives specified in condition 10-1 are met.	CAR TFMMP Sandhill Dunnart monitoring results. Ground disturbance areas on GIS database. Annual Sandhill Dunnart Report for DBCA.	Overall	Once Proposal implementation commences. For the life of the project.	C	The TFMMP was approved by the EPA Services Division for the CEO on 20 February 2020. The TFMMP was implemented at the commencement of proposal implementation. Monitoring results are presented in the CAR and the GHD Technical Memorandum Sandhill Dunnart and Feral Species Image Analysis (2023)
1046:M10.2	Terrestrial Fauna	The proponent shall consult with Parks and Wildlife and prepare and submit a TFMMP (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 TFMMP before submission to the CEO for approval.	Written and/or verbal correspondence from DBCA.	Pre-construction	Prior to the submission of the TFMMP to the CEO for approval.	CLD	The TFMMP was prepared in consultation with (Parks and Wildlife) DBCA prior to submission to the CEO for approval.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1046:M10.3	Terrestrial Fauna	The TFMMP 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.	The TFMMP to include the required provisions. .	CAR Terrestrial Fauna Monitoring and Management Plan. Monitoring Schedule. Sandhill Dunnart Conservation Management Plan (SDCMP).	Pre-construction	Prior to the submission of the TFMMP to the CEP for approval.	CLD	The TFMMP was approved by the EPA Services Division for the CEO on 20 February 2020. The TFMMP was implemented at the commencement of proposal implementation. The SDCMP was approved 31 January 2023 by the Department of Climate Change, Energy, the Environment and Water (DCCEE). Monitoring results presented in GHD Technical Memorandum Sandhill Dunnart and Feral Species Image Analysis (2023).
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.	C	Sandhill Dunnart Conservation Plan approved by DCCEE on 31 January 2023 (outside reporting period). Plan shall be implemented post approval and results presented in GHD Technical memorandum Sandhill Dunnart and Feral Species Image Analysis
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 TFMMP required by condition 7-1 satisfies the requirements of condition 7-2 to meet the objectives required by condition 10-1.	Implement the approved version of the TFMMP	Written correspondence from CEO.	Overall	Once Proposal implementation commences.	C	The TFMMP was approved by the EPA Services Division of the DWER on 20 February 2020. The TFMMP was implemented at the commencement of proposal implementation No revisions have been made during the reporting period and has been implemented as approved
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 (AHMP), so that the environmental objectives specified in condition 11-1 are met.	CAR AHMP	Overall	Once Proposal implementation commences. For the life of the project.	C	The AHMP was approved by the EPA Services Division of the DWER on 3 January 2019 and implemented as approved.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
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 (DAA) in the preparation of the AHMP 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 AHMP 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.	The AHMP to include the required provisions.	AHMP. CAR	Overall	Prior to ground disturbing activities.	C	The AHMP was implemented prior to ground disturbing activities. The approval process, monitoring and recording of ground disturbance activities ensures that no heritage areas have been impacted during the reporting period. No matters have reported on.
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 meet the objective required by condition 11-1.	Implement the approved version of the AHMP.	Written correspondence from CEO.	Overall	Once Proposal implementation commences.	C	Approval has been received in writing from the CEO on 3 January 2020. The approved version of the AHMP was implemented prior to ground disturbing activities.
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 (GMMP), so that the environmental objectives specified in condition 12-1 are met.	CAR GMMP.	Overall	Once Proposal implementation commences. For the life of the project.	C	The Groundwater Monitoring and Management Plan (GMMP) was approved by the EPA Services Division for the CEO on 6 May 2020. The CEMP was implemented once proposal implementation commenced. Monitoring results are presented in the Environmental Monitoring Report for the calendar year 2022 (DMIRS AER). No dewatering or reinjection occurred during the reporting period.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
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 (GMMP) 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 GMMP before submission to the CEO for approval.	Written and/or verbal correspondence from (DMP) DMIRS.	Pre-construction	Prior to submission of the GMMP to the EPA Service Unit and CEO for approval.	CLD	The GMMP was prepared in consultation with (DMP) 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.	The GMMP to include the required provisions.	Groundwater Monitoring and Management Plan (GMMP)	Pre-construction	Prior to submission of the GMMP to the EPA and CEO for approval.	CLD	The GMMP was approved by the EPA Services Division for the CEO on 6 May 2020.
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 GMMP	Groundwater Monitoring and Management Plan (GMMP). Compliance Assessment Report (CAR)	Overall	Once Proposal implementation commences.	C	The GMMP has been implemented. Monitoring results are presented in Environmental Monitoring Report for calendar year 2022 (DMIRS AER)
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 meters 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 (SMMP) , so that the environmental outcome specified in condition 13-1 are met.	CAR SMMP	Overall	Once Proposal implementation commences. For the life of the project.	C	The SMMP was approved by the EPA Services Division for the CEO on 1 September 2020. The SSMP was implemented once proposal implementation commenced. Monitoring results are presented in Environmental Monitoring Report for calendar year 2022 (DMIRS AER)
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	Consult with DMIRS (formerly DMP) on the SMMP before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre-construction	Prior to submission of the SMMP to the CEO for approval.	CLD	The SMMP was prepared in consultation with DMIRS and approved by the EPA Service Unit for the CEO.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		condition 6-2, to meet the outcome of condition 13-1.						
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 SMMP.	Written correspondence from CEO.	Overall	Once Proposal implementation commences.	C	The SMMP was approved by the EPA Services Division for the CEO on 1 September 2020.
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 SMMP, so that the environmental objective specified in condition 14-1 is met.	CAR SMMP.	Overall	Once Proposal implementation commences. For the life of the project.	C	The SMMP was implemented once proposal implementation commenced. Monitoring results are presented in the Environmental Monitoring Report for calendar year 2022 (DMIRS AER)
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 SMMP before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre-construction	Prior to submission of the objective based SMMP to the CEO for approval.	CLD	The SMMP was prepared in consultation with (DMP) DMIRS prior to submission to the EPA Service Unit and 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.	The SMMP to include the required provisions.	SMMP CAR	Pre-construction	Prior to the submission of objective based SMMP.	CLD	The SMMP has been approved by the EPA Services Division for the CEO. The SMMP was implemented since proposal implementation commenced.
1046:M14.4	Terrestrial Environmental Quality (Objective based)	The proponent shall continue to implement the version of the SMMP 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	Implement the approved version of the SMMP.	Written correspondence from CEO.	Overall	Once Proposal implementation commences.	C	The SMMP has been approved by the EPA Services Division of the DWER. Approval has been received in writing from the CEO on 1 September 2020.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		condition 14-1.						
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 meters of carbonaceous material beneath them, and they are covered with a minimum of 1 meter 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 meter clay liner beneath it and is covered with a minimum of 1 meter of appropriate material to act as a capillary break at closure.	Implement the approved version of the Tailings Storage Facility Monitoring and Management Plan (TSFMMP), so that the environmental outcomes specified in condition 15-1 are met.	TSFMMP CAR	Overall	Once Proposal implementation commences. For the life of the project.	NR	The TSFMMP was approved by the EPA Services Division for the CEO on 28 August 2020. No construction of the TSF has commenced.
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 TSFMMP before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre-construction	Prior to submission of the TSFMMP to the CEO for approval.	CLD	The TSFMMP was prepared in consultation with (DMP) 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.	The TSFMMP to include the required provisions. .	TSFMMP CAR	Pre-construction	Prior to submission of the TSFMMP to the CEO for approval.	CLD	The TSFMMP has been approved by the EPA Services Division for the CEO. No construction of the TSF has commenced.
1046:M15.4	Tailings Storage Facilities	The proponent shall continue to implement the version of the Tailings Storage Facility Monitoring and Management Plan most	Implement the approved version of the TSFMMP.	Written correspondence from the CEO.	Overall	Once Proposal implementation commences.	NR	The TSFMMP was approved by the EPA Services Division for the CEO on 28 August 2020. No construction of the TSF has



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		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.						commenced.
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 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.	Implement the approved version of the Above Ground Tailings Storage Facility Monitoring and Management Plan (AGTSFMMP), so that the environmental outcome specified in condition 16-1 are met.	AGTSFMMP CAR	Overall	Once Proposal implementation commences. For the life of the project.	NR	AGTSFMMP was approved by the EPA Services Division for the CEO on 7 April 2021. No construction of the above ground tailings storage facility has commenced.
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 AGTSFMMP 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.	CLD	The AGTSFMMP 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.	The Above Ground Tailings Storage Facility Monitoring and Management Plan to include the required provisions	Above Ground Tailings Storage Facility Monitoring and Management Plan. CAR	Pre-construction	Prior to submission of the Above Ground Tailings Storage Facility Monitoring and Management Plan to the CEO for approval For the life of the project.	CLD	The AGTSFMMP was approved by the EPA Services Division for the CEO. No construction or operation of a TSF commenced during the reporting period.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
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 condition 6-1 satisfies the requirements of condition 6-2 to meet the outcome required by condition 16-1.	Implement the approved version of the AGTSFMMP.	Above Ground Tailings Storage Facility Monitoring and Management Plan. CAR	Overall	Once Proposal implementation commences.	NR	The AGTSFMMP has been approved by the EPA Services Division for the CEO. No construction of the above ground TSF has commenced.
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 EPA Service Unit for CEO approving Plans.	Pre-construction	Submit Monitoring and Management Plans prior to the construction of each stage, if required.	CLD	All currently required Monitoring and Management Plans have been submitted to, and approved by, the EPA Services Division for the CEO.

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)*

Ref: g2489_F014_02_Approved_PER ~ Date: August 2017

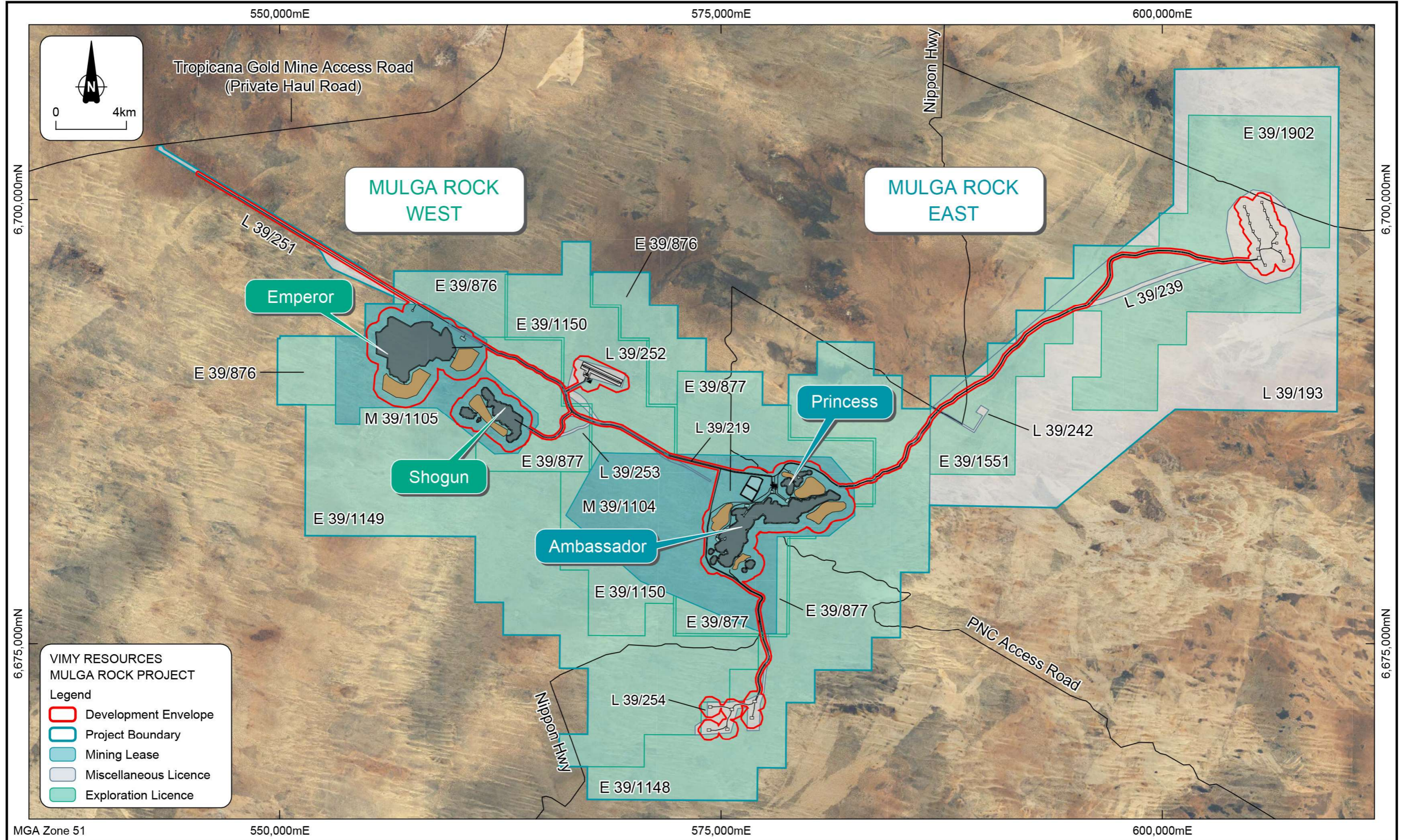


Figure 1 : Project Development Envelope and Project Boundary

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 1

Audit Table



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

Appendix 5

Sandhill Dunnart and Feral Species Image Analysis

Technical Memorandum

March 3, 2023

To	Niv Reddy	Contact No.	9666 8689
Copy to	Drew Farrar	Email	Glen.gaikhorst@ghd.com
From	Glen Gaikhorst	Project No.	12598389
Project Name	Sandhill Dunnart Conservation Management Area		
Subject	Sandhill Dunnart and Feral Species Image Analysis		

1. Introduction

Since 2014 GHD has been assisting Deep Yellow (formerly Vimy Resources Limited) at the Mulga Rocks Uranium Project (MRP) in the identification and analysis of remote camera images for all small mammal species. The focus species for undertaking this work is the Sandhill Dunnart (*Sminthopsis psammophila*) which is listed as endangered under both the *Biodiversity Conservation Act 2016* (BC Act) and the *Environmental Protection Biodiversity Conservation Act 1999* (EPBC Act).

The initial programs (2014) were establishing best technique and camera types to use to capture Sandhill Dunnart. In 2015 this program was extended to 15 sites around the Mulga Rocks operational area with the program extending more regionally in late 2015. This data and analysis were presented in GHD 2021a.

1.1 Background

In Vimy Resources Limited goal of seeking environmental approvals for the project referral was sort on the 28 November 2013 under the EPBC Act to the Department of Agriculture, Water and the Environment (DAWE) (EPBC 2013/7083). On 7 January 2014, DAWE determined MRP a “controlled action”, with the controlling provisions being “listed threatened species and communities” and “nuclear actions”, to be assessed under the bilateral agreement with the Western Australian State Government. The MRP was federally approved on the 2 March 2017 with a condition attached to offsetting the residual impact to the Sandhill Dunnart (*Sminthopsis psammophila*).

Condition 2 of the EPBC 2013/7083 approval requires the preparation of a Sandhill Dunnart Conservation Plan (SDCP) to reduce the impact to the Sandhill Dunnart posed by feral animals within a defined conservation area. The SDCP is based around a 6000ha portion of land (Conservation Area) within the Sandhill Dunnarts known distribution. In order to implement the SDCP an understanding of the presence of the species and feral animals is required including an understanding of baseline data.

In December 2021 a study plan was developed by GHD (GHD 2021b) to locate 30 remote camera locations with the conservation area with the intent to utilise 25 of them to obtain preliminary data of Sandhill Dunnart presence and feral species use. This assessment was to be done over a 12 month period.

1.2 Purpose of this Memorandum

This memorandum provides;

- Evidence of Sandhill Dunnart presence and use within the Conservation Area

- A brief analysis of events and locations that recorded Sandhill Dunnart
- Evidence of all feral species recorded on remote camera
- A brief analysis of feral species abundance and use within the Conservation Area.

1.3 Scope and limitations

This memorandum has been prepared by GHD for Deep Yellow and may only be used and relied on by Deep Yellow for the purpose agreed between GHD and Deep Yellow as set out in section 1.2 of this memorandum. GHD otherwise disclaims responsibility to any person other than Deep Yellow arising in connection with this memorandum. GHD also excludes implied warranties and conditions, to the extent legally permissible. The services undertaken by GHD in connection with preparing this memorandum were limited to those specifically detailed in the memorandum and are subject to the scope limitations set out in the memorandum. This memo reports on 6 months of data, with an annual report provided once 12 months of data is acquired.

GHD has prepared this memorandum on the basis of information provided by Deep Yellow and others who provided information to GHD (including Government authorities and private individuals), which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the letter report which were caused by or omissions in that information.

Site conditions may change after the date of the field survey. GHD does not accept responsibility arising from, or in connection with, any change to the site conditions. GHD is also not responsible for updating this memorandum if the site conditions change.

2. Methodology

2.1 Infra-red cameras

The device Reconyx Hyperfire 550, utilizing white LED flash for colour day/night photo capture at close range were used across at 25 of the designated 30 sites as presented in GHD2021b.

2.2 Sensitivity and trigger response

All cameras were set up in the same format with high sensitivity and a camera trigger speed of 1.34 and 0.2 seconds. The trapping efficiency for Sandhill Dunnart (*Sminthopsis psammophila*) was calculated by utilising one event over a 24-hour period per species and calculating all events at a site divided by total number of camera trap nights across all sites.

2.3 Trapping layout

Camera layout formations were kept consistent across all sites, employing a doublet design along an “X” fence line with horizontal cameras placed on posts facing south at its central point. As such, each site consisted of two deployed devices for greater coverage, represented as cameras A and B at each site. The trap layout is described in greater detail in GHD 2021b.

Fresh batteries and SD cards are replaced on the regular basis and downloaded into a central database and labelled accordingly. All images are stored in site and device (A or B) before sending the dataset to GHD for assessment.

2.4 Identification

Sandhill Dunnart (*Sminthopsis psammophila*) were identified in accordance with the Deep Yellows Camera Trapping Protocol, Sandhill Dunnart (*Sminthopsis psammophila*) of the Mulga Rock Project Area (Vimy 2015) and via the consultant’s specialist experience. Glen Gaikhorst has worked on Sandhill Dunnarts since 2001 both in and ex situ.

A confidence key was developed to demonstrate the consultant's confidence in the species identification provided. This is presented below in Table 1.

Table 1. Confidence key for image analysis

Confidence key	
High	High level of confidence of species identification (clear morphological characteristics)
Moderate	Moderate level of confidence of species identification (lacking some degree of detail)
Low	Low level of confidence (blurred image or lacking significant detail detail)

2.5 Event definition

An event was defined as any identification image series within a 24-hour period, unless multiple size classes/life stages were observed, providing strong evidence multiple individuals were present, then further events were recorded.

3. Results

From the images analysed from the Mulga Rocks project between late November 2021 and mid August 2022, (a period of approximately 260 days), the Sandhill Dunnart (*Sminthopsis psammophila*) was identified on 42 remote camera devices across 23 sites providing 375 discreet events. Only two sites of the 25 did not record Sandhill Dunnart. This infers there is a good representative population of Sandhill Dunnart persisting within the Conservation area.

Trap efficiency varied from 0 to 10.46% over the nine month period. High events indicated resident specimen in the area. Peak activity periods of the Sandhill Dunnart across most sites were approximately from April through to July. Dispersion of young and other fluctuations in population dynamics such as vagrant movement of males in the population are likely to account for these peak movement periods.

Predatory feral species, consisting of cats and red foxes were recorded on 8 devices across 8 sites providing 8 discreet events. All of these event were singular inferring the presence of invasive predatory species is low within the conservation period.

After 12 months of data the aim will be to establish thresholds and triggers that induce management actions represented within the Conservation Management Plan.

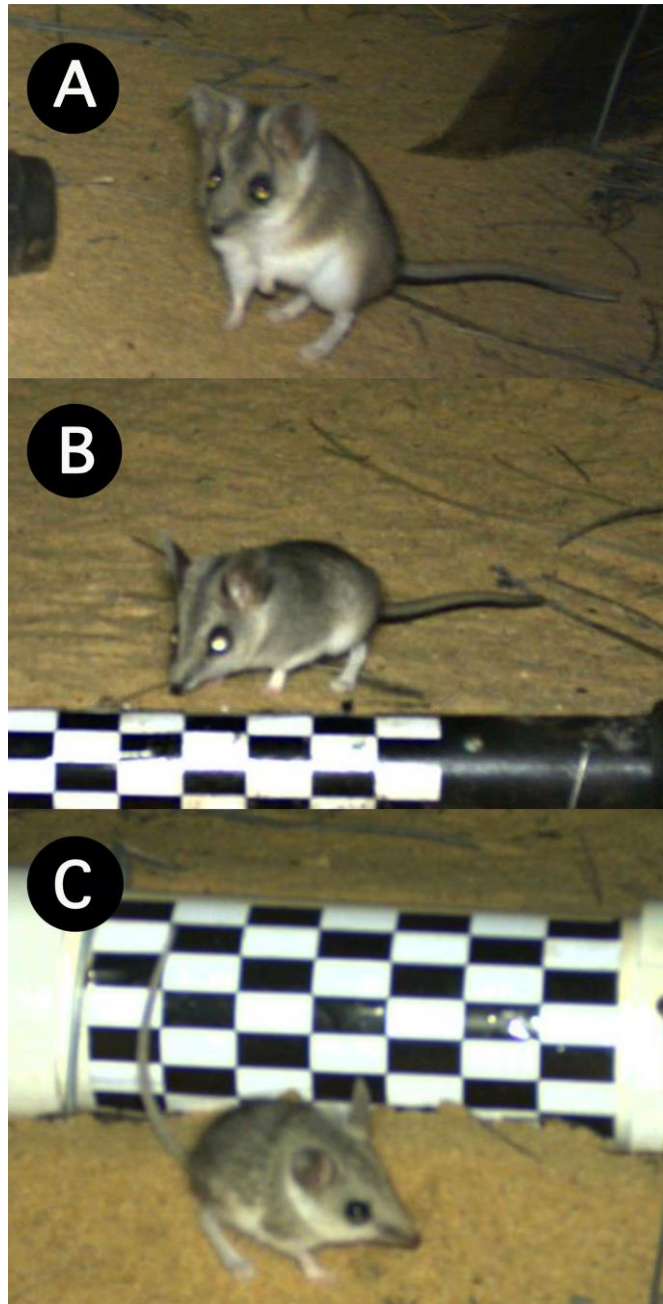


Figure 1. shows size class variation of *Sminthopsis psammophila* present across the survey area. A); adult individual, B); sub-adult individual, C); juvenile individual.

Table 2. Displays captured events of the Sandhill Dunnart (*Sminthopsis psammophila*) and associated trapping efficiency per device per site. Events were defined as any identification series within a 24-hour period, unless multiple size classes/life stages were observed then further events were recorded (Figure 1).

Sites	Captures (events) Sandhill Dunnart	Efficiency
Site 1 A	5 events	1.97%
Site 1 B	13 events	5.13%
Site 2 A	5 events	1.93%
Site 2 B	4 events	1.55%
Site 3 A	4 events	1.54%
Site 3 B	12 events	4.63%
Site 4 A	0 events	0.00%
Site 4 B	0 events	0.00%
Site 5 A	13 events	5.15%
Site 5 B	8 events	3.17%
Site 6 A	1 event	0.38%
Site 6 B	2 events	0.77%
Site 7 A	7 events	2.73%
Site 7 B	4 events	1.56%
Site 8 A	9 events	3.48%
Site 8 B	12 events	4.65%
Site 9 A	0 events	0.00%
Site 9 B	4 events	1.54%
Site 10 A	4 events	1.53%
Site 10 B	0 events	0.00%
Site 11 A	8 events	3.17%
Site 11 B	9 events	3.57%
Site 12 A	27 events	10.46%
Site 12 B	20 events	7.75%
Site 13 A	6 events	2.31%

This Technical Memorandum is provided as an interim output under our agreement with Deep Yellow. It is provided to foster discussion in relation to technical matters associated with the project and should not be relied upon in any way.

Sites	Captures (events) Sandhill Dunnart	Efficiency
Site 13 B	9 events	3.47%
Site 14 A	3 events	1.15%
Site 14 B	2 events	0.77%
Site 15 A	9 events	3.48%
Site 15 B	5 events	1.93%
Site 17 A	0 events	0.00%
Site 17 B	21 events	8.13%
Site 18 A	0 events	0.00%
Site 18 B	1 event	0.38%
Site 19 A	4 events	1.55%
Site 19 B	22 events	8.52%
Site 20 A	3 events	1.16%
Site 20 B	21 events	8.13%
Site 21 A	17 events	6.58%
Site 21 B	2 events	0.77%
Site 22 A	14 events	5.42%
Site 22 B	3 events	1.16%
Site 23 A	0 events	0.00%
Site 23 B	0 events	0.00%
Site 28 A	6 events	2.35%
Site 28 B	8 events	3.13%
Site 29 A	14 events	5.46%
Site 29 B	9 events	3.51%
Site 30 A	13 events	5.03%
Site 30 B	12 events	4.65%

This Technical Memorandum is provided as an interim output under our agreement with Deep Yellow. It is provided to foster discussion in relation to technical matters associated with the project and should not be relied upon in any way.

Table 3. Displays captured events of feral cat (*Vulpes vulpes*) activity and associated trapping efficiency per device per site. Devices where event captures were not observed were excluded.

Site	Captures – red fox	Trapping efficiency
Site 11 A	1 event	0.39%
Site 12 A	1 event	0.38%

Table 4. Displays captured events of feral cat (*Felis catus*) activity and associated trapping efficiency per device per site. Devices where event captures were not observed were excluded.

Site	Captures – feral cat	Trapping efficiency
Site 7 B	1 event	0.39%
Site 8 A	1 event	0.38%
Site 20 A	1 event	0.38%
Site 22 B	1 event	0.38%
Site 23 B	1 event	0.38%
Site 28 B	1 event	0.39%



Regards

Glen Gaikhorst
Senior Zoologist