



EPBC Act Annual Compliance Report 2024

Isaac Downs – EPBC Act Referral 2019/8413

Stanmore Resources Limited

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Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
01	5 November 2024	B. Bodley	P. Tett/ B. Parfitt (Stanmore)	P. Tett

Basis of Report

This report has been prepared by SLR Consulting Australia (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Stanmore Resources Limited (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.



Executive Summary

Introduction

Stanmore Resources Limited (Stanmore) engaged SLR Consulting Australia Pty. Ltd. (SLR) to prepare the Annual Compliance Report (the Report) for the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) Approval for Isaac Downs Mine, near Moranbah, Queensland (EPBC 2019/8413), (the Approval). The Report is required by Condition 27 of the Approval.

Description of Activities and EPBC Act Approval

The Isaac Downs Mine is located in Central Queensland, approximately 145 kilometres (km) southwest of Mackay and 10 km south-east of the Moranbah township. The Isaac Downs Mine (IDM) forms part of the wider Isaac Plains Coal Complex (IPCC) and was approved for construction and operation in July 2021. In February 2022 the Dragline walked from Isaac Plains East Extension to the Isaac Downs Open Cut operations. Coal from mining operations is processed at the Coal Handling and Preparation Plant (CHPP) which is located within the original Isaac Plains Mining Leases. Isaac Plains Complex has a life of mine of approximately eight to ten years and is expected to produce 30 million tonnes (Mt) of Run of Mine (ROM) coal.

The IDM Project is the subject of the Approval which was referred (as the Isaac Plains South Project) under the EPBC Act in April 2019.

The Approved Action is:

“To develop and operate an open cut coal mine and associated infrastructure approximately 10 km south-east of Moranbah, Queensland.”

The initial Approval (EPBC 2019/8413) was issued to Stanmore IP Coal Pty Ltd (ABN: 79 606 244 615) on the 26th of May 2021. The action subject to the Approval officially commenced on the 9th of August 2021, subsequently this is the third report and covers the period of the 9th of August 2023 to the 8th of August 2024.

The Approval relates to the EPBC Act Controlling Provisions:

- Listed threatened species and communities (sections 18 & 18A); and
- Water resources/trigger (sections 24D & 24E).

Specifically, the Approval addresses:

- Clearing of habitat for Koala (*Phascolarctos cinereus*), Greater Glider (*Petauroides volans*), Squatter Pigeon (Southern) (*Geophaps scripta scripta*) (including breeding and foraging habitat) and Ornamental Snake (*Denisonia maculata*); and
- Management and Monitoring of Groundwater Dependent Ecosystems.

The approval contains requirements for offsets under the EPBC Act Environmental Offsets Policy (offset policy), including the development of an offset area management plan (OAMP), ornamental snake offset area management plan (OS-OAMP), significant species management plan (SSMP) and a groundwater dependent ecosystem management and monitoring plan (GDEMMP). The management plans outline management and monitoring actions to minimise any impact to Listed threatened species under the EPBC Act.

Habitat Impacts and Offset area

Offset areas are required by the Approval to compensate for the habitat clearing required for the Isaac Downs Project and include impacted habitat for:



- Koala (*Phascolarctos cinereus*) (131.9 ha);
- Greater Glider (*Petauroides volans*) (120.9 ha);
- Squatter Pigeon (Southern) (*Geophaps scripta scripta*) (Breeding habitat – 66.6 ha) (Foraging habitat – 55.5) and
- Ornamental Snake (*Denisonia maculata*) (173.5 ha).

Stanmore had legally secured offset areas within Mt Spencer Station as an offset for residual impacts to Koala habitat, Greater Glider habitat and Squatter Pigeon habitat (breeding habitat and foraging habitat). Although offsets for the Ornamental Snake are required, Mt Spencer Station did not contain habitat to offset these matters. As such, required offsets for the Ornamental Snake are addressed in a separate offset area. The offset areas for the separate Isaac Plains East (IPE) EPBC Approval (2016/7827) and Isaac Plains East Extension (IPEE) EPBC Approval (2019/8548) are located adjacent to the IDM offset area (Koala, Greater Glider and Squatter Pigeon) at Mt Spencer. The OAMP was subsequently developed and submitted to the department.

Stanmore had proposed to legally secure the required offset area for the Ornamental Snake habitat on the Denham Park property. Originally, the Ornamental Snake offset was proposed at Nunbank Station, however, the regulatory department raised concerns as to the suitability of the proposed offset location. Following discussions with the department, Stanmore elected to pursue an alternate offset area on Denham Park. The OS-OAMP was subsequently developed submitted to the department in October 2022 with approval of the plan granted in April 2023. Stanmore requested legal security via voluntary declaration on the 12th of June 2023 and legally secured the offset on the 30th of November 2023.

Audit Methods

The key site contact was Stanmore's, Environmental Principal IPC, Belinda Parfitt.

The Audit was conducted by SLR Technical Director, Paul Tett. Paul has in excess of 30 years' experience as an environmental professional associated with the mining and industrial sectors.

A site visit to the Isaac Downs Mine was undertaken by the auditor on the 18th of October 2024 during which interviews and evidence gathering were undertaken. A site inspection of the Isaac Plains Downs disturbance footprint was completed as part of the site visit.

Compliance status for each Approval Condition was determined in accordance with the rankings C = Complaint, NC = Non-Compliant and NA = Not Applicable.

Key Findings

For the period of the Annual Compliance Report, Stanmore was compliant (as qualified) with all but four of the applicable conditions of the Approval.

The four non-compliant findings, included:

- Condition 4 Partial compliance was found however, overall non-compliance was found relative to ongoing implementation of the plan, due to:
 - Year one habitat quality assessment (2023) inclusive of targeted ornamental snake survey was not able to be evidenced.
 - No Annual compliance report was evidenced.
- Condition 11 which required provision of evidence to the **department** within **5 business days** of the legal mechanism being executed for the Ornamental Snake Offset Area. Required evidence was provided to the department on the seventh business day following legal securing;



- Condition 17 which related to requirement for an updated Groundwater Dependent Ecosystem, Management and Monitoring Plan (GDEMMP) to be submitted for approval to the minister within 2.5 years of the approval date. Provision of an updated GDEMMP to the minister was due by the 26th of November 2023. No evidence of providing the updated GDEMMP to the minister for approval was available; and
- Condition 25 which related to the submission and publication of Management Plans. The Significant Species Management Plan (SSMP) and the GDEMMP were not published on the Stanmore web site as at the 16th of October 2024.

There were 14 “Non-Applicable” findings made during the reporting period.



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1.0 Introduction

Stanmore Resources Limited (Stanmore) engaged SLR Consulting Australia Pty. Ltd. (SLR) to prepare the Annual Compliance Report (the Report) for the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) *Approval for Isaac Downs Mine, near Moranbah, Queensland (EPBC 2019/8413)*, (the Approval). The Report was required by Condition 27 of the Approval, which stated:

“The approval holder must prepare a compliance report for each 12-month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:

- a) publish each compliance report on the website within 60 business days following the relevant 12-month period;*
- b) notify the department by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication;*
- c) keep all compliance reports publicly available on the website until this approval expires;*
- d) exclude or redact sensitive ecological data or commercial or personal data from compliance reports published on the website; and*
- e) where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the department within 5 business days of publication.*

Note: Compliance reports may be published on the department's website.”

The Report presents the findings of an audit which was undertaken to assess the compliance status of Stanmore's Isaac Downs Mine (IDM) operations against the Approval. The audit focused on each of the conditions contained in the Approval. The audit site visit was undertaken on the 18th of October 2024, with evidence gathering and reporting finalised throughout October and November 2024.

The report was prepared in general accordance with the *Annual Compliance Report Guidelines, Commonwealth of Australia 2014*.

1.1 Description of Activities and EPBC Act Approval

The Isaac Downs Mine is located in Central Queensland, approximately 145 kilometres (km) southwest of Mackay and 10 km south-east of the Moranbah township (**Figure 1**). The IDM forms part of the wider Isaac Plains Coal Complex (**Figure 2**) and was approved for construction and operation in July 2021. In February 2022 the Dragline was transferred from Isaac Plains East Extension to the Isaac Downs Open Cut operations. Coal from mining operations is processed at the Coal Handling and Preparation Plant (CHPP) which is located within the original Isaac Plains Mining Leases. Isaac Plains Complex has a life of mine of approximately eight to ten years and is expected to produce 30 million tonnes (Mt) of Run of Mine (ROM) coal.

The IDM Project was the subject of the Approval which was referred (as the Isaac Plains South Project) under the EPBC Act in April 2019. The Referral Decision was issued on the 14th of May 2019, being Controlled Action Assessment Approach Preliminary Documentation, public notification of the Preliminary Documentation was undertaken on the 26th of May 2021. The initial Approval (EPBC 2019/8413) was issued to Stanmore IP South Pty Ltd (ABN: 96 625 536 094) on the 26th of May 2021. The Approved Action is:

“To develop and operate an open cut coal mine and associated infrastructure approximately 10 km south-east of Moranbah, Queensland”



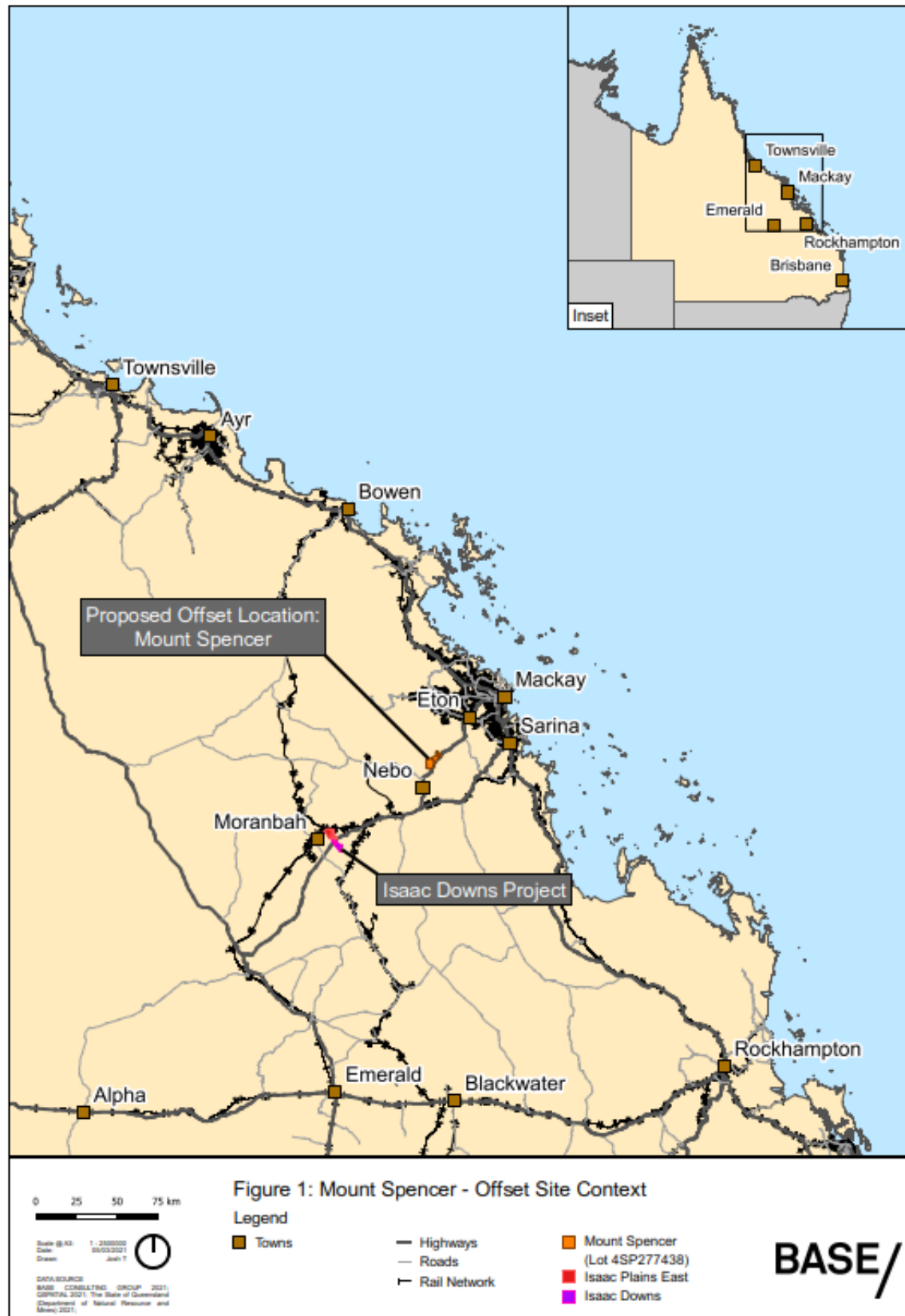


Figure 1: Site Context



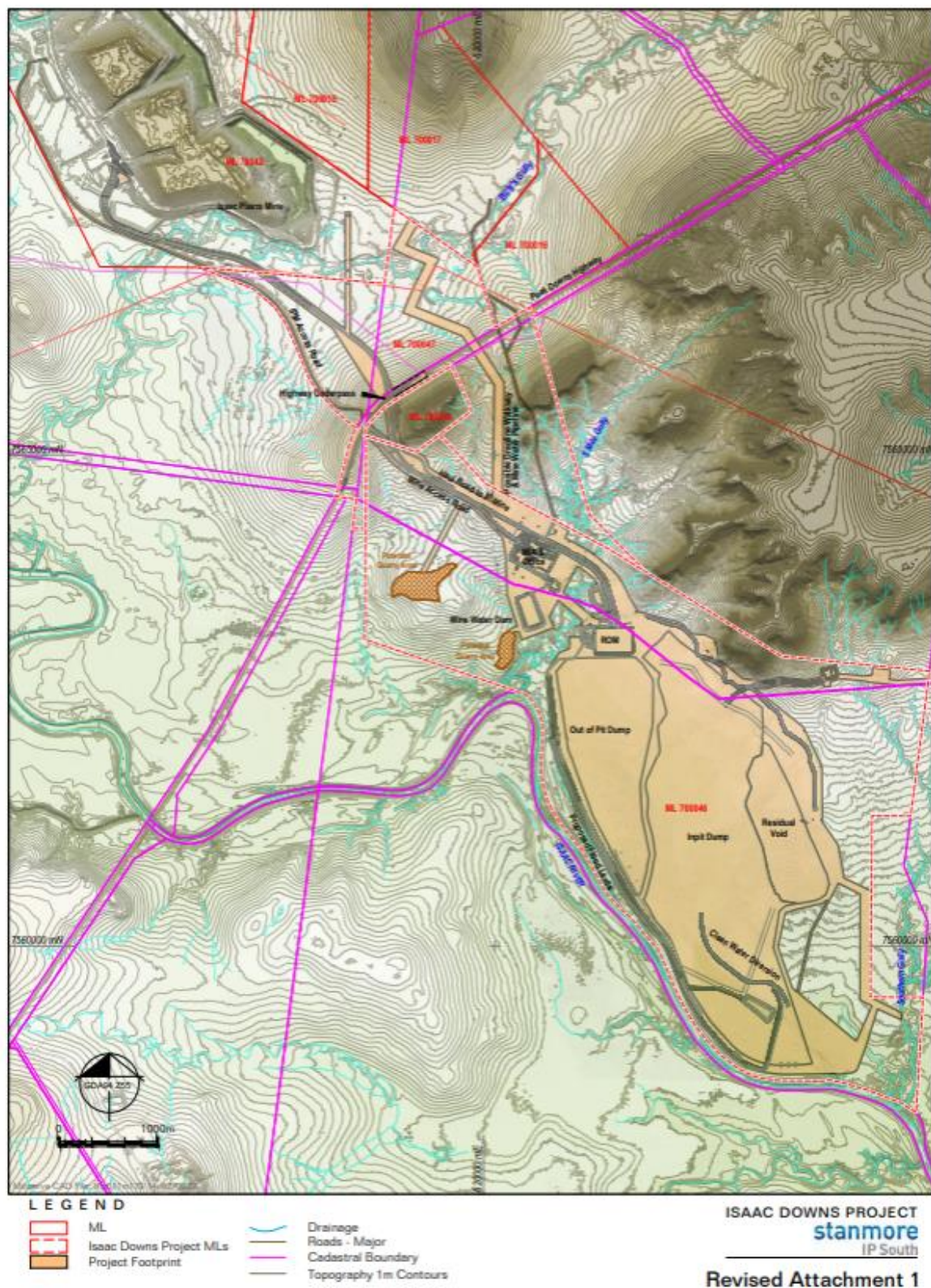


Figure 2: Site Setting



For the period of the compliance report the responsible department for the Approval was the Department of Climate Change, Energy, the Environment and Water (DCCEEW), referred to as “department”.

The action subject to the Approval officially commenced on the 9th of August 2021, subsequently this report is the third report and covers the period of the 9th of August 2023 to the 8th of August 2024.

Specifically, the Approval addresses:

- Clearing of habitat for Koala (*Phascolarctos cinereus*), Greater Glider (*Petauroides volans*), Squatter Pigeon (Southern) (*Geophaps scripta scripta*) (including breeding and foraging habitat) and Ornamental Snake (*Denisonia maculata*); and
- Management and monitoring of Groundwater Dependent Ecosystems.

The approval contains requirements for offsets under the EPBC Act Environmental Offsets Policy (offset policy), including the development of an offset area management plan (OAMP), ornamental snake offset area management plan (OS-OAMP), significant species management plan (SSMP) and a groundwater dependent ecosystem management and monitoring plan (GDEMMP). The management plans outline management and monitoring actions to minimise any impact to Listed threatened species under the EPBC Act.

1.2 Habitat Impacts and Offset Area

Offset areas are required by the Approval to compensate for the habitat clearing required for the Isaac Downs Project and include impacted habitat for:

- Koala (*Phascolarctos cinereus*) (131.9 ha);
- Greater Glider (*Petauroides volans*) (120.9 ha);
- Squatter Pigeon (Southern) (*Geophaps scripta scripta*) (Breeding habitat - 66.6 ha) (Foraging habitat - 55.5); and
- Ornamental Snake (*Denisonia maculata*) (173.5 ha).

Stanmore had legally secured offset areas within Mt Spencer Station as an offset for residual impacts to Koala habitat, Greater Glider habitat and Squatter Pigeon habitat (breeding habitat and foraging habitat). Although offsets for the Ornamental Snake are required, Mt Spencer Station did not contain habitat to offset these matters. As such, required offsets for the Ornamental Snake are addressed in a separate offset area. The offset areas for the separate Isaac Plains East (IPE) EPBC Approval (2016/7827) and Isaac Plains East Extension (IPEE) EPBC Approval (2019/8548) are located adjacent to the IDM offset area (Koala, Greater Glider and Squatter Pigeon) at Mt Spencer. The OAMP was subsequently developed and submitted to the department.

Stanmore had proposed to legally secure the required offset area for the Ornamental Snake habitat on the Denham Park property. Originally, the Ornamental Snake offset was proposed at Nunbank Station, however, the regulatory department raised concerns as to the suitability of the proposed offset location. Following discussions with the department, Stanmore elected to pursue an alternate offset area on Denham Park. The OS-OAMP was subsequently developed submitted to the department in October 2022 with approval of the plan granted in April 2023. Stanmore requested legal security via voluntary declaration on the 12th of June 2023 and legally secured the offset on the 30th of November 2023.



2.0 Audit Methods

The key site contact was Stanmore's Environmental Principal, Belinda Parfitt.

The Audit was conducted by SLR Technical Director, Paul Tett. Paul has in excess of 30 years' experience as an environmental professional associated with the mining and industrial sectors, including more than 11 years as a site based environmental practitioner, with the balance as a consultant focused primarily on mining and industrial projects. Paul is an experienced auditor having undertaken multiple compliance audits of mining and industrial operations. In addition, Paul has completed Environmental Management System (EMS) Auditor (ISO14001:2015) training, is a Member of the Australasian Institute of Mining and Metallurgy (AusIMM) and the Environment Institute of Australia and New Zealand (EIANZ). Paul is a Queensland Commissioner for Declarations.

The audit was conducted through sourcing key site documents from Stanmore staff. The audit protocol was developed based on the conditions of the Approval and used as the primary basis for questioning and evidence gathering. Audit tables for the implementation of the OAMP, OS-OAMP, SSMP and GDEMMP are provided (**Appendix A**).

A site visit to the Isaac Plains Complex was undertaken by the auditor on the 18th of October 2024 during which interviews and evidence gathering were undertaken. A site inspection of the Isaac Downs Mine disturbance footprint was completed as part of the site visit.

The following staff were interviewed throughout the audit process:

- Belinda Parfitt – Environmental Principal; and
- Jason Manser – Senior Mining Engineer.

Selected photographs taken during the site visit are included (**Appendix B**).

Compliance status for each Approval condition was determined in accordance with the rankings in **Table 1**.

Table 1: Audit Rankings

Rankings	Description
C - Compliant	Evidence and or actions completed, signifies compliance with the intent and/or requirement of the condition. Where applicable qualifying text is included.
NC - Non-Compliant	Evidence indicated that a specific requirement of the condition has not been met. Where applicable qualifying text is included.
NA - Not Applicable	Requirement was not triggered within the period of the Annual Compliance Report, or the requirement was met prior to the reporting period.

2.1 Limitations

The Report reflects the audit findings based on preliminary questioning, visual inspections undertaken during the site visit, interview responses received during the site visit, follow up questioning post site visit and information contained in the verifying/supporting documentation provided.



2.2 Declaration of Accuracy

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



Signed

Full name Paul Tett (BSc (AES), Member AusIMM, Member EIANZ)

Position Technical Director (Environmental Management, Permitting and Compliance)

Organisation SLR Consulting Australia Pty. Ltd. (ABN: 29 001 584 612)

Date 5th of November 2024.

3.0 Key Findings and Observations

For the period of the Annual Compliance Report, Stanmore was compliant (as qualified) with all but three of the applicable conditions of the Approval.

The three non-compliant findings, included:

The four non-compliant findings, included:

- Condition 4 Partial compliance was found however, overall non-compliance was found relative to ongoing implementation of the plan, due to:
 - Year one habitat quality assessment (2023) inclusive of targeted ornamental snake survey was not able to be evidenced.
 - No Annual compliance report was evidenced.
- Condition 11 which required provision of evidence to the **department** within **5 business days** of the legal mechanism being executed for the Ornamental Snake Offset Area. Required evidence was provided to the department on the seventh business day following legal securing;
- Condition 17 which related to requirement for an updated Groundwater Dependent Ecosystem, Management and Monitoring Plan (GDEMMP) to be submitted for approval to the minister within 2.5 years of the approval date. Provision of an updated GDEMMP to the minister was due by the 26th of November 2023. No evidence of providing the updated GDEMMP to the minister for approval was available; and
- Condition 25 which related to the submission and publication of Management Plans. The Significant Species Management Plan (SSMP) and the GDEMMP were not published on the Stanmore web site as at the 16th of October 2024.

There were 14 “Non-Applicable” findings made during the reporting period.

No new environmental risks relative to the Approval were identified during the reporting period.



Staff interviewed throughout the audit process demonstrated sound understanding of the Approval requirements and the operational system controls required to ensure compliance with the conditions of the Approval. Management commitment to compliance with the Approval was evident.

Opportunities for improvement are highlighted in **Table 2** and **Appendix A**.



4.0 Detailed Findings

Table 2 details the findings of the audit relative to each Approval condition.

Table 2: Detailed Audit Findings

Condition Number	Condition	Findings	Compliance Status
Conditions specific to the action			
Maximum Impact Limits			
1	The approval holder must not impact beyond the limits of the Project area	<p>The action relevant to the period of the report had been undertaken within the Isaac Downs Project Area approval boundary, with areas subject to Permits to Disturb (PTD) falling within areas zoned within the EA as Authorised Land Disturbance.</p> <p>During the site visit, disturbance boundary markers were located (signage, fences) with no observed disturbance occurring outside of designated areas.</p> <p>Permits to disturb 184, 194, and 195 were reviewed. These highlighted disturbance areas (maps and GIS files provided), impacts to MNES, and any additional requirements for EPBC assessment process. Disturbance footprints were overlayed with approval boundaries to check for exceedances.</p> <p><i>Evidence: Site inspection, limit of disturbance markers, fencing and pegging, Environmental Authority (EA0002817 – 19th May 2022), PTD (184, 194 & 195), authorised boundary spatial data, aerial photography, Google Earth Imagery (viewed 1/11/2024).</i></p>	C
2	<p>The approval holder must not impact more than:</p> <p>a) 131.9 ha of Koala (<i>Phascolarctos cinereus</i>) habitat;</p> <p>b) 120.9 ha of Greater Glider (<i>Petauroides volans</i>) habitat;</p>	<p>Reconciliation of MNES species habitat mapping against PTDs applicable to the Report period was undertaken and compared to the confirmed disturbed areas from the 2023 Compliance Report. Estimated current disturbance areas are as follows:</p>	C



Condition Number	Condition	Findings	Compliance Status
	<p>c) 66.6 ha of Squatter Pigeon (southern) (<i>Geophaps scripta scripta</i>) breeding habitat;</p> <p>d) 55.5 ha of Squatter Pigeon (southern) (<i>Geophaps scripta scripta</i>) foraging habitat; and</p> <p>e) 173.5 ha of Ornamental Snake (<i>Denisonia maculata</i>) habitat.</p>	<ul style="list-style-type: none"> Koala: 41.1 ha Greater Glider: 40.3 ha Squatter Pidgeon (Breeding): 28.4 ha Squatter Pidgeon (Foraging): 12.7 ha Ornamental Snake: 129.74 ha <p>Estimates remain within the approved disturbance area for each species.</p> <p><i>Evidence: Permits to Disturb (184, 194, 195), MNES shapefiles, EPBC ID RA clearing spreadsheet (2023).</i></p>	
Environmental Offset Reports			
3	<p>To compensate for the impacts to habitat for listed threatened species up to the limits specified in condition 2.a to 2.d, the approval holder must, prior to the commencement of the action and for the duration of the approval, implement the Offset Area Management Plan (OAMP).</p>	<p>The OAMP was developed and prepared to support the referral under the <i>Commonwealth Environment Protection and Biodiversity Conservation Act 1999</i>.</p> <p>The OAMP was implemented during the audit period. Four quarterly land manager reports were provided for the relevant period, which included notes on rainfall, stock rotation, and weed and pest management. Fence maintenance was not specifically referenced in reports, however, it is understood to be a routine land management activity.</p> <p>No record of fires or unauthorised clearing was included in land manager reports.</p> <p>A template for land manager reports would help aid address all requirement of the OAMP. <u>Opportunity</u>.</p>	C



Condition Number	Condition	Findings	Compliance Status
		<i>Evidence: OAMP, Stanmore Offset Area Quarterly Land Manager Notes (Q3 2023, Q4 2023, Q1 2024 and Q2 2024), Isaac Downs – Offset Area Baseline Monitoring Report – February 2022.</i>	
4	To compensate for the impacts to Ornamental Snake (<i>Denisonia maculata</i>) habitat up to the limits specified in condition 2.e, the approval holder must submit an Ornamental Snake Offset Area Management Plan (OS-OAMP), prepared by a suitably qualified ecologist and consistent with the Environmental offsets policy , within 12 months of the date of the commencement of the action for the written approval of the Minister. The approval holder must implement the approved OS-OAMP, and provide written evidence to the department , within 6 months of the approval of the OS-OAMP.	<p>The Ornamental Snake Offset Area Management Plan was developed by a suitably qualified person (<i>A suitably qualified person is a person who has professional qualifications, training, or skills and at least five (5) years of experience relevant to the nominated subject matters to give authoritative assessment, advice, and analysis about performance relevant to the subject matter using relevant protocols, standards, methods and/or literature.</i>)</p> <p>The OS-OAMP was submitted to the DCCEEW on the 16th of October 2022 and was finalised on the 20th of March 2023. The OS-OAMP was subsequently approved on the 6th of April 2023. Compliant with this aspect.</p> <p>Written confirmation regarding implementation of the OS-OAMP was achieved, being provided to the department on the 3rd of October 2023 (within six months of approval). Compliant with this aspect.</p> <p>Non-compliant findings relative to ongoing implementation of the plan was found due to:</p> <ul style="list-style-type: none"> • Year one habitat quality assessment (2023) inclusive of targeted ornamental snake survey was not able to be evidenced. • No Annual compliance report was evidenced. 	NC



Condition Number	Condition	Findings	Compliance Status
		<p>Quarterly land manager reports should be initiated. A template for land manager reports would help aid address all requirement of the OAMP. Opportunity.</p> <p><i>Evidence: Ornamental Snake Offset Area Management Plan, OAMP approval letter (dated the 6th April 2023). Email - H. Wincen (Stanmore) to postapproval@dcceew.gov.au, RE: EPBC Approval 2019/8413 Commencement of OAMP (Ornamental Snake at Denham Park) (3rd of October 2023).</i></p>	
5	<p>The approval holder must not impact more than 120 ha of Ornamental Snake (<i>Denisonia maculata</i>) habitat unless the OS-OAMP has been approved by the Minister in writing.</p>	<p>The OS-OAMP was submitted to the DCCEEW on the 16th of October 2022 and was finalised on the 20th of March 2023. The OS-OAMP was subsequently approved on the 6th of April 2023.</p> <p>As the OS-OAMP was approved, more than 120 ha of Ornamental Snake habitat is permitted be disturbed.</p> <p><i>Evidence: Ornamental Snake Offset Area Management Plan, OAMP approval letter (dated 6th April 2023).</i></p>	C
6	<p>For every hectare of Ornamental Snake (<i>Denisonia maculata</i>) habitat impacted prior to approval of the OS-OAMP (i.e., prior clearance), the approval holder must provide an offset in addition to the offset for the total impact to Ornamental Snake (<i>Denisonia maculata</i>) habitat.</p> <p>Note: Condition 6 requires the area of habitat to be input into the impact calculator of the Offsets assessments guide to be the total area of habitat impacted plus prior clearance ($\leq 173.5 \text{ ha} + \text{prior clearance}$).</p>	<p>The OS-OAMP was submitted to the DCCEEW on the 16th of October 2022 and was finalised on the 20th of March 2023. The OS-OAMP was subsequently approved on the 6th of April 2023.</p> <p>As outlined in section 1.2 of the OS-OAMP, 1,020 ha of offset area was proposed to be secured at Denham Park.</p> <p>As for Condition 1 Ornamental Snake habitat clearing remained within the total allowed.</p>	C



Condition Number	Condition	Findings	Compliance Status
		<i>Evidence: Ornamental Snake Offset Area Management Plan 2023 (Denham Park – Ornamental Snake Offset Area Management Plan: EPBC 2019/8413), letter dated the 16th of October 2023 from DCCEEW approving the OAMP.</i>	
OS-OAMP			
7	<p>The approval holder must ensure the OS-OAMP required under condition 4 includes the following:</p> <ul style="list-style-type: none"> a) details to demonstrate how the offset(s) proposed compensates for the impacts to Ornamental Snake (<i>Denisonia maculata</i>) habitat and any prior clearance in accordance with the Environmental offsets policy; b) a description of the offset(s), including location, size, condition, environmental values present and surrounding land uses; c) relevant baseline data and other supporting evidence, including results from field validation surveys and quantifiable ecological data, that documents the presence or likely presence of the Ornamental Snake (<i>Denisonia maculata</i>) and the quality of the Ornamental Snake (<i>Denisonia maculata</i>) habitat within the offset area(s); d) an assessment of the site habitat quality score(s); e) details of how the offset area(s) will provide connectivity with other habitats and biodiversity corridors and/or will contribute to a larger strategic offset for the Ornamental Snake (<i>Denisonia maculata</i>); f) a description and maps (including shapefiles) to clearly define the location and boundaries of the offset area(s), accompanied by the offset attributes (including physical address of the offset area(s), coordinates of the boundary 	<p>The OS-OAMP relates to the Denham Park offset area. The audit report for the previous period found the OS-OAMP was prepared in accordance with the department Environmental Management Guidelines.</p> <p><i>Evidence: Ornamental Snake Offset Area Management Plan 2023 (Denham Park – Ornamental Snake Offset Area Management Plan: EPBC 2019/8413), EPBC Act Annual Compliance Report 2023.</i></p>	C



Condition Number	Condition	Findings	Compliance Status
	<p>points in decimal degrees and the size of the environmental offsets in hectares);</p> <p>g) specific offset completion criteria derived from the site habitat quality score to demonstrate the improvement in the habitat quality score for Ornamental Snake in the offset area(s) over the period of effect of this approval;</p> <p>h) details of the management actions (including timing, frequency, duration and method of outcome measurement), to be carried out to meet the offset completion criteria (the management actions proposed must be consistent with the Environmental management plan guidelines and the approved conservation advice);</p> <p>i) interim performance targets that set targets at 5-yearly intervals for expected progress towards the completion criteria set in condition 7.g;</p> <p>j) details of the nature, timing, and frequency of monitoring to inform progress against achieving the interim performance targets (the frequency of monitoring must be sufficient to track progress towards each set of milestones, and sufficient to determine whether the offset area(s) is/are likely to achieve those milestones in adequate time to implement all necessary corrective actions);</p> <p>k) timing for the implementation of corrective actions if monitoring activities indicate the interim performance targets have not been achieved;</p> <p>l) a risk analysis and a risk management and mitigation strategy for all risks to the successful implementation of the OS-OAMP and timely achievement of the offset completion criteria, including for if the offset fails to achieve and maintain the completion criteria; and</p>		



Condition Number	Condition	Findings	Compliance Status
	m) the legal mechanism that will be used for legally securing the offset area(s) , such that legal security remains in force over the offset area for at least the period of effect of this approval.		
Offset Implementation Reporting			
8	<p>Within 60 business days after the end of each 5-year period from the date of implementation of the OAMP, until the expiry of this approval, the approval holder must submit to the department, and publish on the website for the remainder of the period of the approval, a report that assesses progress towards achieving and maintaining the completion criteria specified in the OAMP and approved OS-OAMP. The report must:</p> <ul style="list-style-type: none"> a) detail performance achieved against all interim performance targets in the period since the date of implementation with more detail in respect of the period since the last report; b) describe the results and effectiveness of all management actions implemented during the period the subject of that report; c) include all monitoring results, including all confirmed sightings of listed threatened species in a format consistent with the Guidelines for biological survey and mapped data; and d) detail any interim performance targets not met and describe all corrective actions taken and evaluate their effectiveness. <p>Once the completion criteria are achieved, they must be maintained by the approval holder for the remainder of the duration of this approval.</p>	<p>Not Triggered.</p> <p>The Offset Area Management Plan was implemented in 2021, and Ornamental Snake Offset Area Management Plan was implemented in March 2023. The end of the 5-year period from the date of implementation will be December 2026 and March 2028 respectively.</p> <p><i>Evidence: Approval EPBC 2019-8413, OAMP (2021), OS-OAMP (2023), OAMP approval letter (dated the 6th of April 2023).</i></p>	NA
9	Within 60 business days of the 20th anniversary of the date of implementation of the OAMP and the OS-OAMP, the approval	Not Triggered.	NA



Condition Number	Condition	Findings	Compliance Status
	holder must submit a report that provides evidence substantiating whether the offset area(s) has/have fully achieved and maintained the completion criteria. If all completion criteria have not been achieved within 20 years from the date of implementation of the OAMP and the OS-OAMP, the approval holder must provide, within 6 months, additional environmental offsets approved by the Minister in writing consistent with the Environmental offsets policy .	The Offset Area Management Plan was implemented in 2021, and Ornamental Snake Offset Area Management Plan was implemented in March 2023. The end of the 20-year period from the date of implementation will be December 2041 and March 2043 respectively. <i>Evidence: Approval EPBC 2019-8413, OAMP (2021), OS-OAMP (2023), OAMP approval letter (dated the 6th of April 2023).</i>	
Legal Securing of Environmental Offsets			
10	The approval holder must legally secure the offset area(s) described in the OAMP and approved OS-OAMP within 12 months of the approval of the associated plan . The OAMP and approved OS-OAMP must be attached to the legal mechanism used to legally secure the associated offset area(s).	The Mt Spencer Offset Area was legally secured by Stanmore through a voluntary declaration in May 2022. The area was declared as an area of high nature conservation value by the Chief executive of the Queensland Department of Resources. The Denham Park Offset Area was legally secured by Stanmore through a voluntary declaration on the 30 th of November 2023. The area was declared as an area of high nature conservation value by the Chief executive of the Queensland Department of Resources. <i>Evidence: Letter from S. Witheyman (Department of Resources) to D. Wright (Stanmore) (19 May 2022), Notice of Declaration (2022/000838), PMAV (2022/000839), Letter from K. Farrant (Department of Resources) to R. Oldham (Stanmore) (6 April 2023), PMAV 2023/002154, Letter from M. Gordon (30 November 2023)</i>	C



Condition Number	Condition	Findings	Compliance Status
11	The approval holder must provide evidence to the department within 5 business days of the legal mechanism being executed.	<p>The legal securing for the Mt Spencer offset occurred outside of the audit period and was found compliant in the previous report.</p> <p>The Denham Park Offset Area was legally secured by Stanmore through a voluntary declaration on the 30th of November 2023. The department was provided evidence of the legal mechanism being executed on the 11th of December 2023, which was <u>seven</u> business days following the legal mechanism being executed.</p> <p><i>Evidence: Previous report.</i></p>	NC
12	The legal mechanism used to legally secure the offset area(s) described in the OAMP and approved OS-OAMP must remain in force from the date of obtaining legal security and for at least the remaining period of effect of this approval.	<p>Both plans described the legal mechanism to secure the respective offset areas.</p> <p>The legal mechanisms used to secure the OAMP offset area were understood to remain in force at the time of the audit.</p> <p><i>Evidence: OAMP and OS-OAMP.</i></p>	C
Significant Species Management Plan			
13	The approval holder must implement the Significant Species Management Plan (SSMP) for the duration of mining activities .	<p>The Matters of National Environmental Significance Significant Species Management Plan was finalised in March 2021. Implementation of the plan was audited in Table 3 of Appendix A.</p> <p>Substantial compliance with requirements of the SSMP was found. However, the speed limit on the haul road between Isaac Downs and the CHPP was 80 km/hr. The</p>	C (qualified)



Condition Number	Condition	Findings	Compliance Status
		<p>haul road speed limit is contradictory to requirements of the SSMP. Furthermore, the 40 km/hr night time speed limit was not signed and training of haul truck operators in the requirement was not evidenced. Whilst this does not constitute non-compliance with the SSMP, given substantial compliance, it presents opportunity for improvement, including signage and training, and update SSMP to reflect. <u>Opportunity.</u></p> <p>The mining contractor induction package was provided for review. The induction package lacked reference to the EPBC MNES and site requirements (including weeds and pests, machinery washdown, roads & tracks significant fauna, etc.). This highlights an Improvement Opportunity to ensure that induction materials comply with the requirements of the SSMP (<i>Contractor Induction</i>). <u>Opportunity.</u></p> <p>Haul road spillage of coal was located at Billy's Gully crossing. Clean up of spilled coal had been initiated in the preceding months. More frequent clean up visits to the Billy's Gully haul road crossing should be scheduled to ensure coal loss to Billys gully is avoided. <u>Opportunity.</u></p> <p><i>Evidence: MNES SSMP (Isaac Downs – MNES Significant Species Management Plan, 2021), Field observation, Permits to Disturb, Confirmation from Belinda Parfitt, Contractor Induction, Dust Management Plan, Blasting Notifications, 2023 Report.</i></p>	
Conservation of the Koala and Greater Glider in the Bowen Basin			



Condition Number	Condition	Findings	Compliance Status
14	The approval holder must contribute a single payment equivalent to the value of \$23,000 (GST exclusive and indexed in line with CPI on the date of this approval) to a program specified by the Minister in writing where the contribution will be used for the better protection and long-term conservation of the Koala (<i>Phascolarctos cinereus</i>) and Greater Glider (<i>Petauroides volans</i>) in the Bowen Basin.	Not triggered. <i>Evidence: B. Parfitt – Email confirmation (04/11/2024).</i>	NA
15	Within 3 months of the date the Minister specifies the program described in condition 14, the approval holder must provide notice to the department , with documentary evidence, that the payment required under condition 14 has been made.	Not triggered. <i>Evidence: B. Parfitt – Email confirmation (04/11/2024).</i>	NA
Groundwater Dependant Ecosystems (GDEs)			
16	The approval holder must implement the GDE Management and Monitoring Plan for at least the duration of this approval.	An updated GDEMMP relevant to the majority of the reporting period was not provided. A Phase 1 intensive baseline assessment had been undertaken during the period of the previous audit, in accordance with the initial GDEMMP. The Baseline assessment report referred to the proposed Phase 2 monitoring approach and trigger level assessment values and provided a <i>basis for a Revised GDEMMP</i> . <i>Evidence: Isaac Downs GDEMMP (Dated the 14th of April 2021. 2023 Report, GDEMMP Monitoring Report Nov 2023. Baseline Data Review and Phase 2 GDEMMP_Rev 2 (March 2023).</i>	C



Condition Number	Condition	Findings	Compliance Status
17	The approval holder must submit a revised GDE Management and Monitoring Plan (GDEMMP) for the written approval of the Minister within 2.5 years from the date of this approval. The revised GDEMMP must be adjusted to include the raw baseline data and to set the trigger values and disturbance thresholds . The approval holder must implement the revised GDEMMP as approved by the Minister within 12 months of submitting to the Minister .	The updated GDEMMP was required to incorporate findings from the initial two years intensive data collection phase (as identified in the GDEMMP, Sections 7.2 and 10). The Baseline Data Review and Phase 2 GDEMMP_Rev 2 (March 2023) addressed the proposed update requirements. However, no evidence was available for submission of a revised GDE Management and Monitoring Plan (GDEMMP) for the written approval of the Minister within 2.5 years (by 26 th of November 2023) from the date of this approval. <i>Evidence: Baseline Data Review and Phase 2 GDEMMP_Rev 2 (March 2023).</i>	NC
18	If the approval holder detects that a trigger value has been reached or exceeded, the approval holder must report this to the department within 5 business days of the detection. Unless evidence can be provided, to the Minister's satisfaction, that the trigger value exceedance is not attributable to mining activities , corrective actions must be implemented within 60 business days of the detection.	Not triggered. <i>Evidence: Baseline Data Review and Phase 2 GDEMMP_Rev 2 (March 2023). GDEMMP Monitoring Report Nov 2023.</i>	NA
19	If corrective actions fail to halt or reverse impacts to GDEs within 24 months from the detection of a trigger level being reached or exceeded, and a disturbance threshold has been exceeded, the approval holder must submit a GDE Offset Strategy within 6 months for the written approval of the Minister . The approval holder must implement the approved GDE Offset Strategy within 12months of submitting to the Minister .	Not triggered. <i>Evidence: Baseline Data Review and Phase 2 GDEMMP_Rev 2 (March 2023). GDEMMP Monitoring Report Nov 2023.</i>	NA
20	Provided no trigger value has been reached or exceeded under condition 18, resulting in the requirement for a GDE Offset Strategy under condition 19, the approval holder must, within 6	Not triggered.	NA



Condition Number	Condition	Findings	Compliance Status
	<p>months of completing follow-up surveys, submit a report to the Minister that provides:</p> <ul style="list-style-type: none"> a) a summary memorandum detailing the current habitat quality score of the GDEs; b) a comparison of the follow-up surveys to the baseline GDE dataset provided in the approved revised GDEMMP, to identify any significant departure from the habitat quality score and/or extent of GDEs when compared to these metrics prior to the commencement of the action; and c) commitments to any future monitoring requirements. 	<p><i>Evidence: Baseline Data Review and Phase 2 GDEMMP_Rev 2 (March 2023). GDEMMP Monitoring Report Nov 2023.</i></p>	
Part B - Standard Administrative Conditions			
Notification of Date of Commencement			
21	The approval holder must notify the department in writing of the date of commencement of the action within 10 business days after the date of the commencement of the action .	<p>Department was notified of the commencement of the action in writing on the 9th of August 2021.</p> <p><i>Evidence: Letter dated the 10th of August 2021 from DAWE to Jon Romcke (Stanmore).</i></p>	C
22	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister .	<p>Not Triggered.</p> <p>The action commenced within 5 years from the date of the approval.</p> <p><i>Evidence: Letter dated the 10th of August 2021 from DAWE to Jon Romcke (Stanmore), Approval EPBC 2019-8413.</i></p>	NA
Compliance Records			



Condition Number	Condition	Findings	Compliance Status
23	The approval holder must maintain accurate and complete compliance records .	<p>Evidence was sighted of internal records, including PTDs, incident reports, correspondence emails, GIS files, blast records and offset area reports.</p> <p>An internal data loss incident report was also provided regarding a data loss event that occurred on the 28th of May 2024. This report highlighted the cause of the incident and the internal steps taken to restore the lost data and prevent future losses.</p> <p><i>Evidence: Post Data Loss Incident Report (24/06/24), Reviewed Documentation.</i></p>	C
24	<p>If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.</p> <p>Note: Compliance records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the department's website or through the general media.</p>	<p>Not triggered.</p> <p><i>Evidence: B. Parfitt – Email confirmation (04/11/2024).</i></p>	NA
Submission and publications of plans			
25	<p>The approval holder must:</p> <ol style="list-style-type: none"> submit plans electronically to the department; unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of the date of: <ol style="list-style-type: none"> this approval, if the approved version of the plan is specified in these conditions, or 	<p>As per the Approval (EPBC 2019-8413) Relevant plans included:</p> <ul style="list-style-type: none"> OAMP (Finalised 14/12/2021); OS-OAMP (Approved 06/04/2023); SSMP (Finalised 12/03/2021); and GDEMMP (Finalised 14/04/2021). <p>As per the previous audit report, the OAMP was uploaded within 20 business days to the Stanmore Website on the</p>	NC



Condition Number	Condition	Findings	Compliance Status
	<p>ii. the date a plan has been approved by the Minister in writing, if the plan requires the approval of the Minister;</p> <p>c) exclude or redact sensitive ecological data or commercial or personal data from plans published on the website or provided to a member of the public; and</p> <p>d) keep plans published on the website until the end date of this approval.</p>	<p>21st of December 2021, in compliance with the condition and the OS-OAMP was uploaded to the Stanmore Website on the 29th of June 2021, outside of the required 20 business days, and therefore not compliant with the condition. Both of these reports were available on the Stanmore website as of the 16th of October 2024.</p> <p>As per the data loss incident reported in the findings for Condition 23, some documents were temporarily unavailable on the Stanmore website.</p> <p>As per the previous audit report, the SSMP and the GDEMMP were not located on the Stanmore website, constituting non-compliance with this condition. Evidence was provided that this had been corrected as of the 16th of November 2023. However, the same two documents were not available on the Stanmore website as at the 16th of October 2024, resulting in non compliance with d). Of note is the format of the Stanmore website had changed during the Report period.</p> <p><i>Evidence: Review of Stanmore website (16th of October 2024), OAMP (2021), OS-OAMP (2023), GDEMMP (2021), SSMP (2021), OS-OAMP approval letter (dated the 6th of April 2023), Approval EPBC 2019-8413.</i></p>	
26	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under all plans is prepared in accordance with the Guidelines for biological survey and mapped data , or subsequent revision, and submitted electronically	As per the previous reporting period, review of the OAMP, OS-OAMP, SSMP and GDEMMP indicate that monitoring data was collected in accordance with relevant guidelines as applicable to the ecological matters being monitored. None of the above plans required submission to the department.	C



Condition Number	Condition	Findings	Compliance Status
	to the department in accordance with the requirements of those plans .	<i>Evidence: OAMP (2021), OS-OAMP (2023), GDEMMP (2021), SSMP (2021), OS-OAMP (2023).</i>	
Annual Compliance Reporting			
27	<p>The approval holder must prepare a compliance report for each 12-month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:</p> <ul style="list-style-type: none"> a) publish each compliance report on the website within 60 business days following the relevant 12-month period; b) notify the department by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication; c) keep all compliance reports publicly available on the website until this approval expires; d) exclude or redact sensitive ecological data or commercial or personal data from compliance reports published on the website; and e) where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the department within 5 business days of publication. <p>Note: Compliance reports may be published on the department's website.</p>	<p>This report was prepared and provided to Stanmore (on the 5th of November 2024) to be published to the Stanmore website within the timeframe applicable to this condition (by the 5th of November 2024).</p> <p>Notification is to be provided to the Department confirming upload of this report to the Stanmore website.</p> <p>The previous Annual Compliance Report for the period (August 9th 2022 to August 9th 2023) was located on the Stanmore Website (https://stanmore.net.au/sustainability/sustainability-reports/) (Confirmed the 16th of October 2024). The department was notified by email on the 2nd of November 2024. – An updated version of the 2023 Compliance Report (Version 2.0) was provided to Stanmore to correct</p> <p>No sensitive ecological data was included in this or the previous year's annual report.</p> <p><i>Evidence: This report (pending upload to the Stanmore website and notification to the Department), Previous Annual Compliance Report published on the Stanmore website, advice of upload email dated 2nd November 2023.</i></p>	C (pending)
Reporting Non-compliance			



Condition Number	Condition	Findings	Compliance Status
28	The approval holder must notify the department in writing of any: incident ; non-compliance with the conditions; or non-compliance with the commitments made in plans . The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify: a) any condition which is or may be in breach; b) a short description of the incident and/or non-compliance; and c) the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.	There were four non compliances found for the 2023 Annual Compliance Report which were included in the Executive Summary and Report body and addressed a) to c) of Condition 28. The 2023 Annual Report was provided to the department as per Condition 27 b). Notification of the above was provided to the department on the 3 rd of November 2023. The Auditor was not aware of any other incident(s) or non-compliance requiring notification during the audit period. <i><u>Evidence:</u> Confirmation from Belinda Parfitt (Environmental Principal) advice of non-compliance email (3rd November 2023),</i>	C
29	The approval holder must provide to the department the details of any incident or non- compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying: a) any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; b) the potential impacts of the incident or non-compliance; and c) the method and timing of any remedial action that will be undertaken by the approval holder.	As per condition 28, the department was notified on the 3 rd of November 2023, with notification of relevant non-compliances addressed sent on the 16 th of November 2023 (9 business days). Evidence was provided that the non-compliance with Condition 25 had been rectified at the time. <i><u>Evidence:</u> Confirmation from Belinda Parfitt (Environmental Principal), advice of corrective action email (16th November 2023).</i>	C
Independent Audit			
30	The approval holder must ensure that independent audits of compliance with the conditions are conducted when requested in writing by the Minister .	Not triggered. <i><u>Evidence:</u> B. Parfitt – Email confirmation (04/11/2024).</i>	NA
31	For each independent audit , the approval holder must:	Not triggered.	NA



Condition Number	Condition	Findings	Compliance Status
	a) provide the name and qualifications of the independent auditor and the draft audit criteria to the department ; b) only commence the independent audit once the audit criteria have been approved in writing by the department ; and c) c. submit an audit report to the department within the timeframe specified in the approved audit criteria.	<u>Evidence:</u> B. Parfitt – Email confirmation (04/11/2024).	
32	The approval holder must publish the audit report on the website within 10 business days of receiving the department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	Not triggered. <u>Evidence:</u> B. Parfitt – Email confirmation (04/11/2024).	NA
Revision of Action Management Plan			
33	The approval holder may, at any time, apply to the Minister for a variation to a plan approved by the Minister , or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act . If the Minister approves a revised plan , the approval holder must then, from the date specified, implement the revised plan in place of the previous plan .	No Management Plans were revised.	NA
Completion of Action			
34	Within 20 business days after the completion of the action , the approval holder must notify the department in writing and provide completion data .	Not triggered. The action was ongoing.	NA



5.0 Reviewed Documentation

Australian Government, Department of Agriculture, Water and the Environment, August 2021, Letter RE: Commencement of the Action – Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413).

Australian Government, Department of Climate Change, Energy, the Environment and Water, April 2023, Letter RE: Approval of Offset Area Management Plan for Isaac Downs Project, near Moranbah Queensland (EPBC 2019/8413).

Australian Government, Department of Environment and Science, May 2022, Environmental Authority (EA0002817).

Base, March 2021, Isaac Downs – MNES Significant Species Management Plan.

Base, December 2021, Isaac Downs – Offset Area Management Plan: EPBC 2019/8413.

Base, February 2022, Isaac Downs – Offset Area Baseline Monitoring Report.

Base, March 2023, Denham Park – Ornamental Snake Offset Area Management Plan: EPBC 2019/8413.

C&R Consulting, December 2022, Isaac Downs Dust Management Plan.

Email (23rd November 2022) Email from D. Bozzetto to environment.compliance@awe.gov.au.
Queensland Government, Department of Resources, May 2023, Letter RE: Declaration made on part of Lot 4 on SP277438 – Isaac Regional Council.

Email (3rd November 2023) Email from B. Parfitt to epbcmonitoring@dcceew.gov.au.
Australian Government, DCCEEW, Letter RE: Stanmore Resources Isaac Downs | EPBC 2019/8413 | Non-compliance with conditions.

Email (16th November 2023) Email from B. Parfitt to epbcmonitoring@dcceew.gov.au.
Australian Government, DCCEEW, Letter RE: Stanmore Resources Isaac Downs | EPBC 2019/8413 | Uploaded to Website SSMP and GDEMMP

Queensland Government, Department of Resources, May 2023, Notice of Declaration (2022/000838).

Queensland Government, Department of Resources, May 2023, Notice of Declaration (2023/002154).

Queensland Government, Property Map of Assessable Vegetation (2022/000839) – LOT on Plan (4SP277438).

SLR, November 2023. Isaac Downs – EPBC Act Annual Compliance Report.

SMG Environmental, November 2022. Isaac Plains East – EPBC Act Annual Compliance Report.

Stanmore, November 2022, Letter RE: Isaac Downs Coal Mine – 7 November 2022; Notification to DCEEW.

Stanmore, Dust Monitoring Charts Isaac Plains Complex -
<https://www.stanmore.au/assets/operations/>. Viewed 4th of October 2024.

Stanmore, Environmental Reports Isaac Plains Complex -
<https://www.stanmore.au/sustainability/environmental-reports/>. Viewed 16 October 2024.

Stanmore, September 2023. Permit to Disturb Form – Permit Number: 184.



Stanmore, April 2024. Permit to Disturb Form – Permit Number: 194.

Stanmore, April 2024. Permit to Disturb Form – Permit Number: 195.

Stanmore, Blast Loading Notification Email, 12th November 2023.

Stanmore, Blast Loading Notification Email, 29th January 2024.

Stanmore, Blast Loading Notification Email, 6th April 2024.

Stanmore, Blast Loading Notification Email, 27th April 2024.

Stanmore, July to September 2023, Offset Area 1,2 & 3 – Lot 4, Mt Spencer Station, Land Manager Notes.

Stanmore, October to December 2023, Offset Area 1,2 & 3 – Lot 4, Mt Spencer Station, Land Manager Notes.

Stanmore, January to March 2024, Offset Area 1,2 & 3 – Lot 4, Mt Spencer Station, Land Manager Notes.

Stanmore, April to June 2024, Offset Area 1,2 & 3 – Lot 4, Mt Spencer Station, Land Manager Notes.

Stanmore/ESPA, Isaac Downs and Isaac Plains HSE Training and Induction Package.

WSM, August 2020, Weed and Pest Management Plan, Isaac Plains Complex and Isaac Downs Project.

3D Environmental, March 2023, Groundwater Dependent Ecosystem Monitoring and Management Plan - Isaac Downs Mine – Baseline Assessment Baseline Data Review and Phase 2 GDEMMP_Rev 2.

3D Environmental, April 2021, Groundwater Dependent Ecosystem (GDE) Management and Monitoring Plan, Isaac Downs Project.

3D Environmental, October 2022, Groundwater Dependent Ecosystem Monitoring and Management Plan – Isaac Downs Mine – Baseline Assessment.

3D Environmental, October 2022, Groundwater Dependent Ecosystem Monitoring and Management Plan – Isaac Downs Mine – Monitoring November 2023.





Appendix A Species Management and Offset Management Plan Implementation – Audit Tables

EPBC Act Annual Compliance Report 2024

Isaac Downs – EPBC Act Referral 2019/8413

Stanmore Resources Limited

SLR Project No.: 626.030235.00001

5 November 2024 (Revision 1)

A.1 Offset Area Management Plan Implementation – Audit Table

Habitat Management Objectives	Management and Mitigation Measures	Trigger for Further Action	Monitoring	Corrective Action	Audit Comments
Habitat or vegetation loss through unplanned land clearing	<ul style="list-style-type: none"> No unapproved and/or intentional clearing of vegetation within the offset area, except for clearing that is required for fencing, access, firebreaks or public safety. Signs and fences will be erected within three months of the offset being legally secured. They will be erected at all entrances and potential access points to the site identifying the area as an environmental offset and stating that access to the site is forbidden. Fences will be maintained to prevent unauthorised access, to minimise incursions by feral herbivores and to control stock presence Ecological thinning may be carried out, but only in accordance with the advice of a suitably qualified expert and only as approved by DAWE. 	<ul style="list-style-type: none"> Any activities that are in contravention of the Voluntary Declaration. Detection of damaged fences associated with vehicle access roads/tracks Detection of prohibited forestry operations, native timber harvesting or clearing outside of established access tracks, fire control lines and fence lines (existing infrastructure). 	<ul style="list-style-type: none"> Monitoring and inspections will monitor and document if there is evidence of recent forestry or timber harvesting activities or illegal clearing. Monitoring will also document vegetation clearing that has occurred for fire break, access road or fence line maintenance. Refer to Section 7.0 for detail on required monitoring. The annual compliance report will document any illegal/unauthorised land clearing. 	<ul style="list-style-type: none"> Notify the Department within 10 business days of clearing Upon being notified or becoming aware of prohibited forestry operations, native timber harvesting or clearing outside of existing infrastructure, the landholder is to assess how unauthorised persons accessed the site Review existing access restrictions and inspect signage and offset area fencing within one fortnight of detection of the clearing. Corrective actions will be implemented immediately (e.g. the regeneration of those areas will be undertaken, and these areas added to the ongoing monitoring sites) and if appropriate the OAMP will be revised and updated if required. Any changes to the OAMP will be reported to the Minister for approval prior to changes in management. 	<ul style="list-style-type: none"> Four quarterly land manager reports were provided for the period applicable to this report. Viewed reports covered the majority of requirements including summaries of grazing activities, monthly rainfall, and pest fauna and weed control activities (<i>Jul 2023 to Jun 2024 Mt Spencer land manager reports</i>). No notes on fence maintenance had been made. However, it is understood to be a routine land management activity. No note of documented fires or unauthorised clearing were included in the land manager reports. No annual compliance report (reporting on monitoring activities) was provided for the period of the plan. A habitat quality assessment was undertaken as part of baseline monitoring undertaken in November 2021, the next required habitat quality score assessment is due in November 2026 (<i>Isaac Downs – Offset Area Baseline Monitoring Report – February 2022</i>).
Control invasive weed species to reduce impacts on MNES from an overdominance of non-native floristic abundance in the understorey.	<ul style="list-style-type: none"> Access to the offset site will be restricted to authorised persons only. Weed management and weed hygiene restrictions will be implemented across the offset site to reduce the extent of existing weeds and to control the potential introduction of other exotic weed species. Weed hygiene and management will be undertaken in consultation with the landowner. Chemical and/or mechanical control of declared weed species will be undertaken in accordance with the control measures outlined in the Biosecurity Queensland Fact Sheets or other sources of information. 	<ul style="list-style-type: none"> An increase in the average percent (%) cover score of weed species from baseline and/or previous monitoring events. Outbreak of infestations of weed species not previously recorded in the offset area during baseline and/or previous monitoring events. An increase in the presence of weeds (relative abundance and/or area of occurrence) as determined from photo monitoring results. An interim performance target is not attained, or a completion criterion is not attained and/or maintained. 	<ul style="list-style-type: none"> Monitoring of weeds and non-native plants will be undertaken during the habitat quality assessment surveys using the same methodology used to the baseline habitat quality as outlined Section 4.1 of the OAMP and EcoSM, 2020a, as well as incidental observations as part of routine management. The annual compliance report will document the presence of weeds, weed control measures and extent of weed cover during the reporting period, and the relevant responsive actions. 	<ul style="list-style-type: none"> Any increase in the relative abundance of invasive or other weed populations from those recorded during the baseline survey, or subsequent monitoring events will trigger the following corrective actions that must be undertaken: <ul style="list-style-type: none"> Review adherence to current weed hygiene procedures to ensure compliance and to update restrictions. Review timing and frequency of weed management measures and implement alternative weed management timeframes. Investigate alternative weed management control actions (eg spot spraying and/or injection of herbicides) and implement. Undertake additional weed management measures until weed populations are reduced. 	<ul style="list-style-type: none"> Spraying of weed species including sickle pod, GRT and lantana reported in quarterly reports. Removal of lantana from internal firebreak fence also noted in the land managers report (<i>Jul 2023 to Jun 2024 Mt Spencer land manager reports</i>). All vehicles entering were to be inspected at the Mt Spencer entrance and recorded (<i>Jun 2024 Mt Spencer land manager report</i>). No annual compliance report (reporting on monitoring activities) was provided for the period of the plan.



Habitat Management Objectives	Management and Mitigation Measures	Trigger for Further Action	Monitoring	Corrective Action	Audit Comments
	<ul style="list-style-type: none"> Refer to Section 6.7 for further details on weed management. 			<ul style="list-style-type: none"> Suitably qualified ecologist to review the OAMP within one month and update if required. 	
Strategic cattle grazing to reduce and manage understorey fuel loads and, native and non- native flora densities.	<ul style="list-style-type: none"> Stock management will be undertaken in consultation with the landowner and as required to achieve the performance objectives and completion criteria. If and where new fencing is required to demarcate the offset area, ensure fencing is permanent and prohibit unintended grazing by cattle. Squatter Pigeon breeding period can vary depending on localised site conditions but generally peaks in the early to mid-dry season (May-July). Grazing will be excluded during the peak Squatter Pigeon breeding and egg laying periods in the early to mid-dry season. 	<ul style="list-style-type: none"> Livestock located in the offset areas outside of strategic grazing events. Livestock located in the offset areas during breeding season (May to and including July). Damaged fencing is observed Habitat Quality assessments indicate native grass groundcover is <30% or >55%. If ecological surveys indicate an extended or varied peak breeding period outside the early to mid-dry season. 	<ul style="list-style-type: none"> Regular inspections of the offset area will be undertaken during normal land management and farming practices to examine fence lines when stock are grazing in the offset area and/or adjacent to the offset area. Records will be kept of when and how many cattle graze in offset areas. Regular inspections will be undertaken to assess signs of overgrazing and pugging. Habitat quality assessments will be undertaken in accordance with this OAMP and will include assessment of percentage cover of native perennial grasses. 	<ul style="list-style-type: none"> Amend livestock management practices including amendment of stocking rates, and/or timing, and/or duration and/or frequency of strategic grazing events until native grass cover is >30% <55%. Repair offset area boundary fencing if damaged within one week of detection. Removing stock when excessive pugging or overgrazing is observed such that native grass cover is <30%. Remove stock from Squatter Pigeon breeding habitat where found to be grazing in Squatter Pigeon breeding season. Construct additional fencing if required. Should monitoring activities identify triggers for further action, the OAMP will be reviewed by a suitably qualified ecologist within one month and updated if required. Any corrective action identified will be implemented within 1 month of the OAMP being updated. 	<ul style="list-style-type: none"> The offset area was grazed selectively with cattle regularly rotated between paddocks within the offset area. Paddocks were routinely emptied of all cattle. (<i>Jul 2023 to Sep 2024 Mt Spencer land manager reports</i>). A habitat quality assessment was undertaken as part of baseline monitoring undertaken in November 2021, the next required habitat quality score assessment is due in November 2026. (<i>Isaac Downs – Offset Area Baseline Monitoring Report – February 2022</i>). No documented evidence of fence inspections in land manager notes, however this is understood to be routine land management practice.
Minimise habitat degradation caused by feral animals including Feral Pigs and Feral Horses.	<ul style="list-style-type: none"> Pest animal management will be undertaken in consultation with the landowner and in accordance with general pest management processes. Refer to Section 6.6 for details. Pest management will include a range of best management practice actions including shooting, trapping, fencing and baiting, and will be undertaken in accordance with Queensland's Department of Agriculture and Fisheries (DAF) guidelines 7 and the requirements of the Biosecurity Act 2014. If an increase in feral pest species is noted above trigger levels, additional pest management/control measures will be instigated until the increased activity has ceased. 	<ul style="list-style-type: none"> Any increase in sightings/signs (tracks) and/or the relative abundance of pest animals above baseline levels and/or previous monitoring event. Observation of, or signs of, a feral animal not identified as occurring within the Project area during the baseline surveys. Habitat quality scores for interim performance targets are not achieved by: <ul style="list-style-type: none"> Year 5 Year 10 Year 15 Year 20 	<ul style="list-style-type: none"> Feral animal presence will be monitored as a minimum through visual signs recorded during monitoring and direct observations. Remote camera monitoring will also be used to assess the presence of feral animals. Feral animal monitoring results, and associated actions, will be included in annual reporting to the Department. Monitoring of habitat quality scores will be undertaken. The results of monitoring events will be compared against baseline habitat quality scores, interim performance targets and completion criteria to determine the progress of the offset area and recorded as part of reporting. 	<ul style="list-style-type: none"> Review adherence to pest animal management actions. Investigate potential sources or reasons for an increase in pest animal numbers and rectify. Increase the frequency or revise the type of invasive pest animal control efforts in accordance with DAF guidelines, and in conjunction with neighbouring landowners. Suitably qualified ecologist to review the OAMP within one month and update if required. 	<ul style="list-style-type: none"> Land manager reports made notes of number of wild dogs controlled on site. Pest control at the Mt Spencer offset area utilised shooting, trapping and baiting activities (<i>Jul 2023 to Jun 2024 Mt Spencer land manager reports</i>). A habitat quality assessment was undertaken as part of baseline monitoring undertaken in November 2021, the next required habitat quality score assessment is due in November 2026. (<i>Isaac Downs – Offset Area Baseline Monitoring Report – February 2022</i>).
Reduce the risk of unplanned fire causing adverse impacts to MNES	<ul style="list-style-type: none"> Controlled burns will be undertaken in consultation with the landowner and in accordance with the recommended fire management 	<ul style="list-style-type: none"> Unplanned fire within the offset area. 	<ul style="list-style-type: none"> Fire breaks are to be inspected annually in September 	<ul style="list-style-type: none"> Occurrences of fire are to be recorded during the visual inspections undertaken during routine land management. 	<ul style="list-style-type: none"> No unplanned burns were noted in the land manager reports for the relevant period (<i>Jul 2023 to Jun 2024 Mt Spencer land manager reports</i>).



Habitat Management Objectives	Management and Mitigation Measures	Trigger for Further Action	Monitoring	Corrective Action	Audit Comments
by strategic fire management.	<p>guidelines for Regional Ecosystems and will involve a range of burn strategies including patchwork burns.</p> <ul style="list-style-type: none"> Fire is to be excluded from the offset area except for planned and strategic burns as required to reduce understorey fuel loads having a detrimental impact on canopy tree recruitment and establishment and to maintain existing fire breaks. Create firebreaks around the offset area boundary to minimise unplanned fire from adjacent lands. Firebreaks are to be co- located, where possible, with roads, fence lines and vehicle access tracks. No areas of MNES will be cleared unless necessary for safety management and without consideration to the impacts and Department requirements (ie habitat areas are not reduced). 	<ul style="list-style-type: none"> Planned fires become out of control or the required burning regime is not achieved. Habitat Quality assessments indicate native grass groundcover is <30% or >55%. 	<ul style="list-style-type: none"> Visual inspection of signs of fire during routine land management and during the habitat quality assessments. Fuel loads will be monitored through monitoring of ground cover and to inform fire management strategies 	<ul style="list-style-type: none"> If an uncontrolled bushfire has impacted the offset area (including if controlled burning becomes out of control), review the grazing management and fire management strategies and adherence to these strategies and exclude cattle for at least three months (depending on conditions for re-growth). All fire breaks will be inspected, maintained, and repaired if required. To ensure compliance, with performance criteria, undertake remedial action including: <ul style="list-style-type: none"> Alteration to stocking rates, and/or duration and frequency of strategic grazing events; and/or Amendments to fire management practices as required including fire safety and containment management. Suitably qualified ecologist to review the OAMP within one month and update if required. 	<ul style="list-style-type: none"> Removal of lantana from internal firebreak fence was noted in the land managers report (<i>Jun 2024 Mt Spencer land manager reports</i>).
Habitat degradation and direct impact to MNES due to unauthorised access to offset site.	<ul style="list-style-type: none"> All signs and fences will be erected within three months of the offset being legally secured. Signs will be erected at all entrances and potential access points to the site stating that access to the site is forbidden. Fences will be maintained to prevent unauthorised access, to minimise incursions by feral herbivores and to control stock presence. 	<ul style="list-style-type: none"> Evidence of unauthorised or unplanned access by persons, vehicles, and/or stock is detected during exclusion periods. Evidence of stock is detected at any point during exclusion times Damage is detected to any fence or sign. 	<ul style="list-style-type: none"> Monitoring of fence lines will be undertaken by the Landholder or suitable qualified person appointed by the approval holder within 3 months of the offset area being legally secured and during quarterly inspections. Inspections will monitor and document damage or loss of signs and evidence of unauthorised access to the offset area. 	<ul style="list-style-type: none"> Upon being notified or becoming aware of prohibited access to the offset area, the approval holder is to reassess access protocols for any lessees etc., signage and general access within one fortnight. Damage to signage and fences will be repaired within one month of noting the damage. If there are areas that have been negatively impacted by unauthorised access, the regeneration of those areas will be undertaken, and these areas added to the ongoing monitoring sites. Signage will be repaired and maintained as required by the Landholder or suitable qualified person appointed by the approval holder. 	<ul style="list-style-type: none"> All vehicles entering were to be inspected at the Mt Spencer entrance and recorded (<i>Jun 2024 Mt Spencer land manager report</i>). Initial baseline habitat quality assessments were undertaken in July and October 2020, with a comprehensive habitat quality and fauna assessment being undertaken in November 2021. The next required habitat quality score assessment is due in November 2026 (<i>Isaac Downs – Offset Area Baseline Monitoring Report, February 2022</i>). No documented evidence of fence inspections in land manager notes, however this is understood to be a routine land management practice.
Offset fails to achieve the interim performance targets and completion criteria within the anticipated 5, 10, 15 and/or 20-year time intervals.	<ul style="list-style-type: none"> All management actions outlined in this OAMP will be implemented to ensure that the interim performance targets and competition criteria are achieved. The Voluntary Declaration under the VM Act will ensure that the landholder remains obliged to undertake active management of the 	<ul style="list-style-type: none"> Interim performance targets are not achieved by year 5, 10 or 15. Completion criteria are not achieved by year 20. 	<ul style="list-style-type: none"> Habitat quality score assessments will be undertaken for each 5-year period, as a minimum. Monitoring of the offset area will be undertaken in accordance with the methods outlined in the OAMP. Monitoring results will be compared against the interim 	<ul style="list-style-type: none"> Habitat quality score assessments will be interim performance targets, or the completion criteria were not achieved within the specified timeframes. This investigation must re- evaluate the suitability of the relevant management actions and identify appropriate corrective actions. As soon as practicable, and within six months of detection of the trigger, implement revised corrective actions. These may include (but not limited to): 	<ul style="list-style-type: none"> Initial baseline habitat quality assessments were undertaken in July and October 2020, with a comprehensive habitat quality and fauna assessment being undertaken in November 2021. The next required habitat quality score assessment is required in November 2026 (<i>Isaac Downs – Offset Area Baseline Monitoring Report, February 2022</i>).



Habitat Management Objectives	Management and Mitigation Measures	Trigger for Further Action	Monitoring	Corrective Action	Audit Comments
	<p>offset until all completion criteria are achieved.</p> <ul style="list-style-type: none">Monitoring will continue for the life of the approval to ensure that completion criteria have been met and maintained.		<p>performance targets and completion criteria to assess progress of offset area in achieving the requirements of this OAMP.</p>	<ul style="list-style-type: none">Increasing the frequency and intensity of pest animal and weed control measures or revising the type of measures to be implemented.<ul style="list-style-type: none">Modify fire management measures, to better support enhancement of offset values.If the investigation outlined above requires changes to the management actions, then as soon as possible, and within six months of detection of the trigger, implement a revisedOAMP, as approved by the Minister, incorporating those recommended changes.Additional offsets will need to be sought by the approval holder, and approved by the Minister, should the above corrective actions not be successful.	<ul style="list-style-type: none">Land manager reports indicate active management of the offset area included management of cattle, weeds and pests (<i>Jul 2023 to Jun 2024 Mt Spencer land manager reports</i>).



A.2 Ornamental Snake Offset Area Management Plan Implementation – Audit Table

Habitat Management Objective	Management and Mitigation Measures	Trigger for Further Actions	Monitoring	Corrective Actions	Audit Comments
Avoid habitat or vegetation loss through unplanned land clearing.	<ul style="list-style-type: none"> No unapproved and/or intentional clearing of vegetation within the offset area for the duration of the approval, except for clearing that is required for fencing, access, firebreaks or public safety. Signs and fences will be erected within three months of the offset being legally secured. They will be erected at all entrances and potential access points to the site identifying the area as an environmental offset and stating that access to the site is forbidden. Fences will be maintained to prevent unauthorised access, to minimise incursions by feral herbivores and to control stock presence. Ecological thinning is not recommended. It may be carried out, but only in accordance with the advice of a suitably qualified expert and only as approved by DCCEEW. 	<ul style="list-style-type: none"> Any activities that are in contravention of the Voluntary Declaration and this OAMP. Detection of damaged fences associated with vehicle access roads/tracks. Detection of prohibited forestry operations, native timber harvesting or clearing outside of established access tracks, fire control lines and fence lines existing infrastructure). 	<p>Monitoring and inspections (section 7.0 and Table 16) will document if there is evidence of recent forestry or timber harvesting activities or illegal clearing.</p> <p>Monitoring will also document vegetation clearing that has occurred for fire break, access road or fence line maintenance.</p> <p>Monitoring will occur at least quarterly during routine land management practices by the land manager.</p> <p>The annual compliance report will document any illegal/ unauthorised land clearing.</p>	<ul style="list-style-type: none"> Upon being notified or becoming aware of prohibited forestry operations, native timber harvesting or clearing outside of existing infrastructure, the landholder is to assess how unauthorised persons accessed the site. Review existing access restrictions and inspect signage and offset area fencing within one fortnight of detection of the clearing. Corrective actions will be implemented immediately (e.g. the regeneration of those areas will be undertaken, and these areas added to the ongoing monitoring sites for the duration of the approval) and if appropriate the OAMP will be revised and updated if required. Any changes to the OAMP will be reported to the Minister for approval prior to changes in management. Any impact on the offset resulting from unauthorised activities must be reported to DCCEEW as a non-compliance as per condition 28 and 29. 	<ul style="list-style-type: none"> Baseline Monitoring (Ecologists), incl. ecological condition, targeted OS survey (annually for first 5 yrs), stocking rates, photo points, weed and feral animals, remote camera, will commence in year 1 following OS-OAMP approval. 5 yearly following this (except OS targeted surveys as above). Year one habitat condition monitoring and annual targeted ornamental snake survey for the Report period was not evidenced. Therefore, non-compliant with implementation of the OS-OAMP. No Annual compliance report was evidenced. Therefore, non-compliant with implementation of the OS-OAMP. No update on additional signs erected within the offset were provided. No correspondence on fence maintenance had been provided. However, it is understood to be a routine land management activity.
Control invasive weed species to reduce impacts on Ornamental Snake from an overabundance of non-native floristic abundance in the understorey.	<ul style="list-style-type: none"> Access to the offset site will be restricted to authorised persons only. Weed management and weed hygiene restrictions will be implemented across the offset site to reduce the extent of existing weeds and to control the potential introduction of other exotic weed species. Weed hygiene and management will be undertaken in consultation with the land manager. Mechanical control of declared weed species will be undertaken in accordance with the control measures outlined in the Biosecurity Queensland Fact Sheets or other sources of information. Broadscale herbicides are not recommended due to the potential impact on Ornamental Snake and habitat for their prey. 	<ul style="list-style-type: none"> An increase in the average percent (%) cover score of weed species from baseline or previous monitoring events. Outbreak of infestations of weed species not previously recorded in the offset area during baseline or previous monitoring events. An increase in the presence of weeds (relative abundance and/or area of occurrence) as determined from photo monitoring results. An interim performance target is not likely to be attained, or a completion criterion is not likely to be attained and/or maintained. 	<ul style="list-style-type: none"> Monitoring of weeds and non-native plants (section 7.0 and Table 16) will be undertaken during the habitat quality assessment surveys using the same methodology used to assess baseline habitat quality. Monitoring of weeds and non-native plants will occur in year one (1) of the approval following the wet season then every (5) years subsequently. The annual compliance report will document the presence of weeds, weed control measures and extent of weed cover during the reporting period, and the relevant responsive actions. 	<ul style="list-style-type: none"> Any increase in the relative abundance of invasive or other weed populations from those recorded during the baseline survey, or subsequent monitoring events will trigger the following corrective actions that must be undertaken: <ul style="list-style-type: none"> Review adherence to current weed hygiene procedures to ensure compliance and to update restrictions. Review timing and frequency of weed management measures as outlined in section 6.6 and implement alternative weed management timeframes. Investigate alternative weed management control actions (e.g. injection of herbicides) and implement. Undertake additional weed management measures until weed populations are reduced. Suitably qualified ecologist to review the OAMP within one month and update if required 	<ul style="list-style-type: none"> Weed management protocols included in management plan. Land holder weed monitoring requirements also listed (<i>Declaration Management Plan</i>). No Annual compliance report was evidenced. Therefore, non-compliant with implementation of the OS-OAMP.



Habitat Management Objective	Management and Mitigation Measures	Trigger for Further Actions	Monitoring	Corrective Actions	Audit Comments
Strategic cattle grazing to minimise degradation of gilgai habitats during the wet season and to reduce and manage understorey fuel loads and, native and non-native flora densities and improve water quality within wetland habitats.	<ul style="list-style-type: none"> Stock management will be undertaken in consultation with the land manager and as required to achieve the performance objectives and completion criteria. If and where new fencing is required to demarcate the offset area, ensure fencing is permanent and prohibit unintended grazing by cattle. Grazing will be excluded during the peak Ornamental Snake activity periods which, in a typical/neutral year is nominally between November-March). The onset, length and end of the wet season changes with the El Nino-Southern Oscillation (ENSO). The length of the wet season is typically three to five months with the duration typically defined by the Bureau of Meteorology (2022) as: <ul style="list-style-type: none"> Neutral year starting in November end ending in March El Nino year starting in December and ending April La Nina year starting in October and ending in March Stock to be removed from the offset area following heavy rainfall at any time of the year, that results in light vehicles unable to drive along unsealed tracks with cattle only returned once conditions permit vehicle access. This is an indicator that cattle could damage gilgai or wetland habitats. 	<ul style="list-style-type: none"> Livestock located in the offset areas during strategic grazing events such as the typical/neutral year wet season (November-March). Damaged fencing is observed. If local weather produces an extended or varied peak activity period for Ornamental Snake outside the typical/neutral year wet season (November- March). If fuel loads are assessed and indicate the groundcover exceeds thresholds (45% cover for AU1 and AU3; 40% for AU2 andAU4). 	<ul style="list-style-type: none"> Regular inspections (refer to section 7.0) at least quarterly) of the offset area will be undertaken during normal land management and farming practices to examine fence lines when stock are grazing in the offset area and/or adjacent to the offset area. Annual records will be kept of when and how many cattle graze in offset area. These records will be kept whenever stock enter the offset area. Regular inspections (refer to section 7.0) will be undertaken to assess signs of overgrazing and pugging. Habitat quality assessments (refer to section 7.0) will be undertaken in accordance with this OAMP and will include assessment of percentage cover of native perennial grasses. These Habitat quality assessments will take place in year one (1) of the approval following the wet season then every (5) years subsequently. 	<ul style="list-style-type: none"> Repair offset area boundary fencing if damaged within one week of detection. Remove stock immediately when found to be grazing in the typical/neutral year wet season. Remove stock following heavy rainfall when light vehicles are unable to drive along unsealed access tracks with cattle only returned once conditions permit vehicle access. This is an indicator that cattle could damage gilgai or wetland areas. Construct additional fencing if stock have been located within the offset area as required. Should monitoring activities identify triggers for further action, the OAMP will be reviewed by a suitably qualified ecologist within one month and updated if required. Any corrective action identified will be implemented within 1 month of the OAMP being updated. 	<ul style="list-style-type: none"> Offset area grazing management plan submitted to landholder. Notes requirement to exclude grazing during peak Ornamental Snake activity periods and requirement to exclude grazing during wet season and periods of heavy rainfall (<i>Letter to landholder 20th September 2023</i>). No correspondence on fence maintenance had been provided. However, it is understood to be a routine land management activity.
Minimise habitat degradation caused by feral animals including feral pigs and rabbits	<ul style="list-style-type: none"> Pest animal management will be undertaken in consultation with the land manager and in accordance with general pest management processes. Pest management will include a range of best management practice actions including shooting, trapping, fencing and baiting, and will be undertaken in accordance with Queensland's Department of Agriculture and Fisheries (DAF) 	<ul style="list-style-type: none"> Any increase in sightings/signs (tracks) and/or the relative abundance of pest animals above baseline levels and/or previous monitoring event. Observation of, or signs of, a feral animal not identified as occurring within the offset area during the baseline surveys. Habitat quality scores for interim performance targets 	<ul style="list-style-type: none"> Feral animal presence will be monitored as outlined in section 7.0. As a minimum through visual signs recorded during monitoring, routine land management and direct observations. Remote camera monitoring will also be used to assess the presence of feral animals. Remote cameras will be placed during ecological 	<ul style="list-style-type: none"> If one of the triggers for further action is triggered, a review of the adherence to pest animal management actions will be undertaken immediately. Investigate potential sources or reasons for an increase in pest animal numbers and rectify. Increase the frequency or revise the type of invasive pest animal control efforts in accordance with DAF guidelines, and in conjunction with neighbouring landowners. 	<ul style="list-style-type: none"> Initial pest surveys were completed as part of fauna surveys completed for the Voluntary Declaration Management Plan. The Management plan includes best management practices for shooting, trapping, fencing and baiting for each target species. No notes have been provided from the land manager so far. Quarterly land manger reports should be initiated. A template for land manager reports



Habitat Management Objective	Management and Mitigation Measures	Trigger for Further Actions	Monitoring	Corrective Actions	Audit Comments
	<p>guidelines and the requirements of the Biosecurity Act 2014.</p> <ul style="list-style-type: none"> If an increase in feral pest species is noted above trigger levels, additional pest management/control measures will be instigated until the increased activity has ceased. 	<p>are not likely to be achieved by:</p> <ul style="list-style-type: none"> Year 5 Year 10 Year 15 Year 20 	<p>surveys to assess habitat quality in year one (1) of the approval following the wet season then every (5) years subsequently. Remote cameras will be placed for a period of 20 camera trap nights targeting gilgais and other Ornamental Snake habitats.</p> <ul style="list-style-type: none"> Feral animal monitoring results, and associated actions, will be included in annual reporting to the Department. Monitoring of habitat quality scores (refer to section 7.0) will be undertaken. The results of monitoring events will be compared against baseline habitat quality scores, interim performance targets and completion criteria to determine the progress of the offset area and recorded as part of reporting. 	<ul style="list-style-type: none"> Suitably qualified ecologist to review the OAMP within one month and update if required. 	<p>would help aid address all requirement of the OAMP. <u>Opportunity.</u></p>
Reduce the risk of unplanned fire causing adverse impacts to the Ornamental Snake by strategic fire management	<ul style="list-style-type: none"> Controlled burns will be undertaken in consultation with the land manager and in accordance with the recommended fire management guidelines for Regional Ecosystems and will involve a range of burn strategies including patchwork burns. Fire is to be excluded from the offset area except for planned and strategic burns as required to reduce understorey fuel loads having a detrimental impact on canopy tree recruitment and establishment and to maintain existing fire breaks. Create firebreaks around the offset area boundary, if required or where a natural firebreak (e.g. creek line, paddock roads or fence lines) does not occur, to minimise unplanned fire from adjacent lands. Firebreaks, if required, are to be co-located, where possible, with roads, fence lines and vehicle access tracks. No areas of Ornamental Snake habitat will be cleared unless necessary for safety management 	<ul style="list-style-type: none"> Unplanned fire within the offset area. Planned fires become out of control or the required burning regime is not achieved. If fuel loads are assessed and indicate the native perennial groundcover exceeds thresholds (i.e 45% cover for AU1 and AU3; 40% for AU2 and AU4 and as per benchmark scores). 	<ul style="list-style-type: none"> Fire breaks are to be inspected annually in September. Visual inspection of signs of fire during routine land management (at least quarterly) and during the habitat quality assessments in year one (1) of the approval following the wet season then every (5) years subsequently. Fuel loads will be monitored during habitat quality assessments (refer to section 7.0), through monitoring of groundcover which will inform fire management strategies. 	<ul style="list-style-type: none"> Occurrences of fire are to be recorded during the visual inspections undertaken during routine land management. (section 7.0). If an uncontrolled bushfire has impacted the offset area (including if controlled burning becomes out of control), review the grazing management and fire management strategies and adherence to these strategies will take place within one (1) month. Cattle will immediately be excluded from the offset area for at least three months (depending on conditions for re-growth). All fire breaks will be inspected, maintained, and repaired if required within one (1) month of the damage occurring. To ensure compliance with performance criteria, undertake remedial action within one month including: <ul style="list-style-type: none"> Alteration to stocking rates, and/or duration and frequency of strategic grazing events. Amendments to fire management practices as required including fire safety and containment management. Suitably qualified ecologist to review the OAMP within one (1) month and update if required. 	<ul style="list-style-type: none"> No notes of unplanned burns have been provided from the land manager so far. Fuel load monitoring and firebreak maintenance listed as requirements for the land manager (<i>Declaration Management Plan</i>). Quarterly land manger reports should be initiated. A template for land manager reports would help aid address all requirement of the OAMP. <u>Opportunity.</u>



Habitat Management Objective	Management and Mitigation Measures	Trigger for Further Actions	Monitoring	Corrective Actions	Audit Comments
	and without consideration to the impacts and Department requirements (i.e. habitat areas are not reduced).				
Habitat degradation and indirect impact to the Ornamental Snake due to unauthorised access to the proposed offset area.	<ul style="list-style-type: none"> All signs and fences will be erected within three (3) months of the offset being legally secured. Signs will be erected at all entrances and potential access points to the site stating that access to the site is forbidden. Fences will be maintained to prevent unauthorised access, to minimise incursions by feral herbivores and to control stock presence. 	<ul style="list-style-type: none"> Evidence of unauthorised or unplanned access by persons, vehicles, and/or stock is detected during exclusion periods. Evidence of stock is detected at any point during exclusion times. Damage is detected to any fence or sign, or Ornamental Snake habitat. 	<ul style="list-style-type: none"> Monitoring of fence lines will be undertaken by the Landholder or suitable qualified person appointed by the approval holder within three (3) months of the offset area being legally secured and during quarterly inspections. Inspections will monitor and document damage or loss of signs, damage to Ornamental Snake habitat and evidence of unauthorised access to the offset area. 	<ul style="list-style-type: none"> Upon being notified or becoming aware of prohibited access to the offset area, the approval holder is to immediately reassess access protocols for any lessees, easement holders etc., signage and general access. Damage to signage and fences will be repaired within one month of noting the damage. If there are areas that have been negatively impacted by unauthorised access, the regeneration of those areas will be undertaken, and these areas added to the ongoing monitoring sites. Signage will be repaired and maintained as required within one (1) fortnight by the Landholder or suitable qualified person appointed by the approval holder. 	<ul style="list-style-type: none"> No update on additional signs erected within the offset were provided. No update on additional fences erected within the offset were provided, however, existing fences already in place. <p>Quarterly land manger reports should be initiated. A template for land manager reports would help aid address all requirement of the OAMP. Opportunity.</p>
Offset fails to achieve the interim performance targets and completion criteria within the anticipated 5, 10, 15 and/or 20-year time intervals including the required benchmark levels of wood debris which provides shelter habitat for Ornamental Snakes. Ongoing monitoring does not confirm the presence of the Ornamental Snake within the offsets area within 5 years.	<ul style="list-style-type: none"> All management actions outlined in this OAMP will be implemented to ensure that the interim performance targets and completion criteria are achieved. The Voluntary Declaration under the VM Act will ensure that the landholder remains obliged to undertake active management of the offset until all completion criteria are achieved. Monitoring and management, as needed, will continue for the life of the approval to ensure that completion criteria have been met and maintained. Add course woody debris to the 11.9.1 vegetation communities within the offset area to achieve at least 75% of course woody debris benchmark levels by year 5 and 100% of benchmark levels by year 10. 	<ul style="list-style-type: none"> Interim performance targets are not likely to be achieved by year 5, 10 or 15. Completion criteria are not achieved by year 20. At least 75% of course woody debris benchmarks levels not attained by year 5 in 11.9.1 vegetation communities. At least 100% of course woody debris benchmarks levels not attained by year 10 in 11.9.1 vegetation communities. 	<ul style="list-style-type: none"> Habitat quality score assessments will be undertaken in year one (1) of the approval following the wet season then every (5) years subsequently. Targeted monitoring for the Ornamental Snake will be undertaken annually in the first five (5) years, as a minimum. Monitoring of the offset area will be undertaken in accordance with the methods outlined in this OAMP. Monitoring results will be compared against the interim performance targets and completion criteria to assess progress of offset area in achieving the requirements of this OAMP. 	<ul style="list-style-type: none"> Within one (1) month of detection of the trigger, complete an investigation into the reasons why the interim performance targets or the completion criteria were not or are not likely to be achieved within the specified timeframes. This investigation must re-evaluate the suitability of the relevant management actions and identify appropriate corrective actions. As soon as practicable, and within six months of detection of the trigger, implement revised corrective actions. These may include (but not limited to): <ul style="list-style-type: none"> Increasing the frequency and intensity of pest animal and weed control measures or revising the type of measures to be implemented. Modify fire management measures to better support enhancement of offset values. If the investigation outlined above requires changes to the management actions, then as soon as possible, and within six (6) months of detection of the trigger, implement a revised OAMP, as approved by the Minister, incorporating those recommended changes. Add additional course woody debris if natural processes and anthropogenic 	<ul style="list-style-type: none"> Initial Habitat quality assessments were undertaken in June and August 2022 to inform the development of the Denham Park Offset Area Management Plan. Year one habitat condition monitoring and annual targeted ornamental snake survey for the Report period was not evidenced. Therefore, non-compliant with implementation of the OS-OAMP.



Habitat Management Objective	Management and Mitigation Measures	Trigger for Further Actions	Monitoring	Corrective Actions	Audit Comments
				supplementation haven't seen benchmark levels realised.	



A.3 Habitat Management Objectives and performance criteria audit (SSMP)

SSMP Management Objectives	Performance Criteria	Management and Mitigation Measures	Trigger For Further Action	Monitoring	Corrective Actions	Audit Comments
Limit or avoid loss of MNES and/or habitat for MNES.	<ul style="list-style-type: none"> Clearing of habitat for MNES does not occur outside of the approved and proposed disturbance footprints. No net loss of habitat for the Koala and Greater Glider outside of the approved disturbance limits. No net loss of permanent water sources for the Squatter Pigeon outside of the approved disturbance limits. No net loss of habitat for the Squatter Pigeon outside of the approved disturbance limits. No net loss of Ornamental Snake foraging resources outside of the approved disturbance limits. No net loss of foraging habitat for the Black-faced Monarch and Satin Flycatcher outside of the approved disturbance limits. Rehabilitation of disturbed areas will be rehabilitated in accordance with the Project's Rehabilitation Management Plan. 	<ul style="list-style-type: none"> Infrastructure will be sited in accordance with the State and Commonwealth approval conditions. Areas requiring vegetation removal will be clearly delineated to ensure disturbance to areas being retained is avoided. Limits of clearing are to be delineated using barricading or temporary fencing and signage prior to works commencing. Exclusion areas are to be clearly shown and labelled on all operational and management drawings and plans. GIS shapefiles will be provided to clearing personnel and/or contractors prior to the commencement of clearing operations. Where exclusion fencing is required, consideration shall be given to fauna movement, current land uses and worker safety requirements. Permanent water sources for retention such as farm dams outside of the disturbance limits will be clearly delineated and shown and labelled on all operational and management drawings and plans Avoid where possible and within the constraints of the mining schedule, impacting on MNES habitat during breeding periods through timing of clearing and creek disturbance activities to avoid the main breeding season of impacted MNES (ie mid dry season to wet season for Squatter Pigeon. Prior to entry to the Project area, all site personnel including contractors shall be made aware via toolbox talks and site information sheets, of the sensitive environs they will be working in and around and be advised of specific limitations to construction works being undertaken in or adjacent to threatened fauna habitat. All staff and contractors will be required to report sightings of relevant fauna in the activity area to the EO immediately. An internal 'Permit to Disturb' system will be used by the EO to ensure that all clearing activities are authorised prior to disturbance. Conditions listed in the Permit to Disturb must be implemented. The EO or delegate will routinely inspect the disturbance limit boundaries to ensure that no clearing or disturbance of vegetation or habitat beyond the approved limits has taken place. Temporary stockpile sites for soil and equipment, access routes, laydown areas and other associated infrastructure will, as far as reasonably practical, be located in cleared areas and will not be situated in areas of MNES habitat. 	<ul style="list-style-type: none"> Clearing of MNES habitat exceeds the approved disturbance limits in Table 1 of this SSMP and/or occurs outside of any approved disturbance limits. Disturbance to permanent water sources, which may provide habitat for Squatter Pigeons and Ornamental Snakes, outside of the disturbance areas. Rehabilitation and decommissioning fails to meet the objectives of the Rehabilitation Management Plan. 	<ul style="list-style-type: none"> Fauna Spotter will monitor, and record clearing activities and all fauna encountered. The Environmental Officer (EO) will monitor and record the total area of MNES habitat cleared every quarter and assess against the disturbance limits outlined in Table 1 of this SSMP. Auditing of the Permit to Disturb will be undertaken quarterly by the EO to ensure any disturbance has been undertaken in accordance with the requirements of the Permit to Disturb, this SSMP and approval conditions and to ensure no unauthorised disturbance has occurred. Rehabilitation monitoring will be undertaken in accordance with Rehabilitation Monitoring Plan that will be required by the final approval conditions. 	<ul style="list-style-type: none"> Should clearing of habitat for MNES exceeds the approved disturbance limits in Table 1 of this SSMP and/or occurs outside of the Project footprint, clearing, works are to cease immediately, and DAWE notified of the incident within five business days. The incident will be recorded in the Project's environmental and incident reporting system register. Following clearing, the area will be assessed within 20 business days by a suitably qualified expert with corrective actions provided to the DAWE via a Corrective Action Contingency Plan. The Plan will include a schedule to implement the corrective actions. Should rehabilitation and decommissioning fail to meet the objectives, completion criteria and schedule of the Rehabilitation Management Plan, the reasons of the failure will be investigated. <p>Corrective Actions:</p> <ul style="list-style-type: none"> The Corrective Actions identified in the Corrective Action Contingency Plan and approved by DAWE will be implemented and may include additional rehabilitation or offsets or provision of additional permanent water sources for the Squatter Pigeon and/or Ornamental Snake prey. 	<ul style="list-style-type: none"> Infrastructure was as per approvals (<i>Field observation</i>). Limits of disturbance were marked using fencing, signage, flagging and pegging (<i>Field observation</i>). Permits to disturb prepared and signed off prior to clearing. Environmental Principal and relevant supervisors signed permits. Fauna Spotters were not listed as required on the PTDs (as per the SMP). During the period of the Report only a previously cleared area which had re-grassed was the subject of inspection by spotter catcher prior to re-disturbance. Clear delineation of clearing boundaries in field was evident. Post clearing field inspections undertaken by Environmental Staff to ensure permit requirements are observed. Requirements of the SSMP addressed in the permits to Disturb (Permits to Disturb). The mining contractor induction package was provided for review. The induction package lacked reference to the EPBC MNES and site requirements (including



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		<ul style="list-style-type: none"> Prior to construction activities commencing, signage, including speed limits, will be erected in the vicinity of exclusion areas to warn of the potential presence of threatened fauna in the area. Pre-clearance surveys will be undertaken by a suitably qualified ecologist using approved State and Commonwealth survey guidelines within 48 hours before clearing activities commencing. The pre-clearance survey will be undertaken in order to: <ul style="list-style-type: none"> Record the location of all hollow bearing trees, log piles and nest using a GPS. Features of tree hollows (diameter, number and whether active/inactive) should be recorded in the Environmental Diary/Register; and Relocate all captured non-breeding animals to suitable habitat adjacent to the disturbance area and within the Project Area. A Fauna Spotter will be present for all clearing activities and will conduct a walk- through survey prior to commencement of clearing and prior to clearing works each day to check vegetation and other fauna habitats. The Fauna Spotter will reinspect the area of cleared vegetation immediately after clearing to locate any potentially injured fauna that should then be taken to a wildlife carer or veterinarian. Vegetation clearing will be undertaken progressively and trees will be felled in the direction of the clearance zone to avoid impacts to adjoining retained vegetation and habitat. Hollow bearing trees will be clearly flagged, and surrounding vegetation removed with the hollow bearing tree left standing for at least one night to encourage fauna to relocate of its own accord. Hollow bearing trees will be inspected to determine if hollows are occupied. If after one night the resident fauna have not moved on, the hollow entrance will be blocked with a towel or similar and the hollow removed by cutting below the hollow section. The hollow with the animal inside will then be installed in nearby similar and adjoining vegetation to be retained at a similar height and orientation with the entrance unblocked at dusk. If the procedure described above is not possible for any reason, hollow-bearing trees will be felled 			<ul style="list-style-type: none"> Within 20 business days of a rehabilitation trigger being activated, a Contingency Plan will be developed by a suitably qualified expert to address the reason for the failure and identify appropriate Corrective Actions. 	<p>weeds and pests, machinery washdown, roads & tracks significant fauna, etc.). This highlights an Improvement Opportunity to ensure that induction materials comply with the requirements of the SSMP (<i>Contractor Induction</i>). Opportunity.</p> <ul style="list-style-type: none"> Custom MNES bench seats and posters present at administrative buildings (<i>Field observation</i>) Preclearing survey undertaken by qualified ecologist. Hollow tree locations historically recorded.



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		<p>using a tree grab or similar that can remove the tree in a controlled fashion. If possible and safe to do so, hollow trees will be felled at dusk to allow fauna the opportunity to disperse during their normal activity period. These trees will be felled away from hollow openings. The tree will be knocked at the base several times prior to felling to encourage fauna to relocate of their own accord. Once the tree is felled, it will be inspected for any fauna and any injured fauna rescued and taken to a wildlife carer or veterinarian.</p> <ul style="list-style-type: none"> Any fauna that is captured will be relocated into the adjacent habitat at least 200 m from the clearing area if clearing works are yet to be completed. Where threatened fauna is identified and delaying the clearing of area is not feasible, (ie the clearing is critical to the activity schedule), a 50 m exclusion zone will be established and the area must not be disturbed for a minimum of 24 hours while clearing is undertaken around the exclusion zone. After 24 hours, a Fauna Spotter/Catcher may relocate the breeding animal to suitable habitat at least 200 m away from the disturbance area. Where survival of young or eggs is unlikely as a result of the disturbance, these are to be handed over to a previously identified wildlife carer or veterinarian. 				
Prevent habitat degradation and a decline in habitat values within habitat adjacent to that within the Project area (ie habitat not proposed to be cleared for the Project or previously approved mining activities at IPC).	<ul style="list-style-type: none"> Maintain habitat quality within the retained MNES habitat in relation to baseline habitat quality scores outlined in EcoSM, 2020). Rehabilitation of disturbed areas will be rehabilitated in accordance with the Project's Rehabilitation Management Plan. 	<ul style="list-style-type: none"> Areas of MNES habitat adjacent to the disturbance footprint and within mining leases, will be clearly delineated and shown and labelled on all operational and management drawings and plans. GIS shapefiles will be provided to clearing personnel and/or contractors prior to the commencement of clearing operations. Site access is only to occur along designated site access tracks. No unauthorised access is permitted. Prior to commencement of the action signage, including speed limits, will be erected to warn of the potential presence of threatened fauna in the area. Posters will be developed and displayed in meeting areas that reminds staff and contractors about the MNES present in the Project area. Prior to entry to the Project area, all site personnel including contractors shall be made aware via toolbox talks and site information sheets, of the sensitive environs they will be working in and around and be advised of specific limitations to construction and/or operational works being 	<ul style="list-style-type: none"> The habitat quality score in areas of retained MNES are not maintained (eg habitat falls below the baseline habitat quality score). 	<ul style="list-style-type: none"> Habitat quality assessments will be integrated with the existing IPM monitoring program. Specific ID monitoring will be undertaken every two (2) years in retained vegetation that provides habitat for MNES. Monitoring will be undertaken in accordance with the Commonwealth survey guidelines and the State guidelines guide for determining terrestrial habitat quality. 	<ul style="list-style-type: none"> Where inadvertent disturbance to MNES habitat occurs, an investigation will be undertaken. Should a decline in the habitat quality scores be observed, the cause will be investigated, and a Corrective Actions Contingency Plan will be developed by a suitably qualified ecologist within 20 business days of the decline being detected. The Plan will include appropriate corrective actions and an implementation schedule for those actions. The DAWE will be notified within 20 business days of the decline in habitat quality. 	<ul style="list-style-type: none"> Limits of disturbance were marked using fencing, signage, flagging and pegging (<i>Field observation</i>). Permits to disturb prepared and signed off prior to clearing. Environmental Principal and relevant supervisors signed permits. Environmental signage in place (<i>Field observation</i>). Custom MNES bench seats and posters present at administrative buildings (<i>Field observation</i>) Fauna spotter catchers were not required to be



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		<p>undertaken in or adjacent to threatened fauna habitat.</p> <ul style="list-style-type: none"> All staff and contractors will be required to report sightings of MNES fauna to the EO immediately where tree hollows that are suspected as being used by Greater Gliders are identified from within the disturbance area, they are to be salvaged to the greatest extent possible and relocated within retained vegetation. As far as practical, the site of the relocation is to be within retained vegetation and replicate the height and orientation of the original breeding or nesting structure. Sections of hollow branch or log will be secured in the new location by mechanical means deemed appropriate by the Fauna Spotter/Catcher (eg bolts, metal bands). Relocation is to be undertaken under the supervision of a spotter/catcher. Selected trees and/or logs will be salvaged and reused as fauna habitat to enhance retained vegetation habitat values (Riparian areas). Trees and other habitat features to be salvaged will be identified and flagged by the Fauna Spotter/Catcher during the walk- through survey and/or clearance activities. If an occupied tree hollow cannot be relocated the breeding habitat should be replaced nearby and in retained vegetation (but at least 200 m away from the disturbance area) in undisturbed habitat, with an artificial nesting structure at a ratio of 1:1 using current best practice nest box design. Implementation of dust suppression techniques in accordance with the Dust Management Plan and the CMSHA and the CMSHR. Maintenance of existing fences. Maintenance of existing water management infrastructure and erosion and sediment control devices. Pest animals and weeds will be managed in accordance with the Project's Weed and Pest Management Plan. Light spill we be directed to the open cut pits to minimise light spill. The use of low wattage lighting with list spill guards. 			<p>Corrective Actions:</p> <ul style="list-style-type: none"> Corrective actions identified in the Plan will be implemented within 30 days of the trigger being detected. Depending on the cause of the decline in habitat quality scores, potential corrective actions may include: <ul style="list-style-type: none"> Rehabilitation of MNES habitat. Additional environmental awareness training to workers regarding MNES. Increasing pest animal and weed control measures or revising the type of measures implemented. Increasing the frequency of dust suppression techniques. Repair fences if damaged, or installation of new fencing. Provision of additional offsets if required. 	<p>engaged for the period relevant to this audit. For grassland clearing prior to topsoil clearing, the environmental team inspected the area. Areas impacted had previously been cleared and were sparse of trees and shrubs (<i>Confirmation from Belinda Parfitt</i>).</p> <ul style="list-style-type: none"> Hollow tree locations historically recorded. Lights were found to be generally facing in pit and ROM areas and avoiding undisturbed habitat (<i>Field observation</i>). Fences were maintained in good order and lower strand was located to allow for fauna movement (<i>Field observation</i>). Standard operating procedures required dust management in accordance with Dust management Plan and Health and Safety Legislation. The haul road was sealed with bitumen. A dusty overburden dumping circuit was observed, the Open Cut Examiner initiated (via two-way radio) slowing of trucks until the water truck was able to attend the circuit, (<i>Dust Management Plan, Field Observation</i>). Lights faced in pit and were positioned to limit impact on undisturbed areas (<i>Field observation</i>). Weed Management Plan in place and implemented. Weeds and Pest



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						management appeared sound with no significant infestations of WoNS or declared (Qld) weeds noted during the site visit. (<i>field observation</i>).
Minimise risk of weed introduction and/or the spread of existing weed species in habitat area for MNES.	<ul style="list-style-type: none"> No new weed species are established in areas of MNES habitat areas based on baseline data. Spreading of weeds does not occur as in areas of retained MNES habitat compared to baseline habitat quality surveys. 	<ul style="list-style-type: none"> Weeds will be managed in accordance with the existing Project's Weed and Pest Management Plan. The Plan includes the following: <ul style="list-style-type: none"> A site induction program that provides weed management information to staff, contractors and visitors. Detailed control measures aimed at eradicating where possible, or otherwise reducing the extent of weeds in accordance with the Queensland Department of Agriculture and Fisheries (DAF) guidelines and the requirements of the Biosecurity Act 2014. Weed washdown procedures for all vehicles brought to site that will be traveling beyond the site office carpark. Targeted weed control measures within the Project area. 	<ul style="list-style-type: none"> An increase in the average percent (%) cover score of weed species from baseline and/or previous monitoring events. Detection of weed species not previously recorded in the Project area during baseline and/or previous monitoring events. 	<ul style="list-style-type: none"> Monitoring of weeds outside of the disturbance areas will be undertaken during the habitat quality assessment surveys. Monitoring will be undertaken every two years (refer to Section 6.1.3). 	<ul style="list-style-type: none"> Should an increase in weed cover or presence of new weed species be observed, an investigation will be undertaken to determine the cause. This will involve reviewing adherence to the Weed and Pest Management Plan and an assessment of the distribution of weeds within the Project area in relation to baseline to determine the cause of the incursions. From the investigation, a Corrective Action Contingency Plan will be developed by a suitably qualified ecologist within 20 business days of the trigger being detected. The Contingency Plan will include appropriate corrective actions and an implementation schedule for those corrective actions. <p>Corrective Actions:</p> <ul style="list-style-type: none"> Corrective actions identified in the contingency plan will be implemented within 30 days of the trigger being detected. Potential corrective actions may include: <ul style="list-style-type: none"> Increasing the frequency and/or duration of weed control efforts. Investigating and/or implementing 	<ul style="list-style-type: none"> Weed Management Plan in place and implemented. Weeds and Pest management appeared sound with no significant infestations of WoNS or declared (Qld) weeds noted during the site visit. (<i>field observation</i>). The mining contractor induction package was provided for review. The induction package lacked reference to the EPBC MNES and site requirements (including weeds and pests, machinery washdown, roads & tracks significant fauna, etc.). This highlights an Improvement Opportunity to ensure that induction materials comply with the requirements of the SSMP (<i>Contractor Induction</i>). Opportunity. Machinery entering site was required to be clean and free from dirt (<i>WPMP</i>). A wash bay was located onsite (<i>Field observation</i>).



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					<p>alternate weed management control actions. Amending weed hygiene practices.</p> <ul style="list-style-type: none"> Updating the Weed and Pest Management Plan. 	
Reduce habitat degradation and potential predation on MNES by pest animals.	<ul style="list-style-type: none"> No new pest animal species are established in areas of MNES habitat in comparison to baseline data. Reduction in pest animal numbers in areas of habitat for MNES to below baseline levels. 	<ul style="list-style-type: none"> Pest animals will be managed in accordance with the ID Weed and Pest Management Plan The Weed and Pest Management Plan will include requirements for: <ul style="list-style-type: none"> Appropriate waste management and waste disposal. A reporting framework to ensure sightings of pest animals are recorded. Site inductions to include information on pest animals including control requirements, importance of appropriate waste management and reporting requirements when pest animals are observed within the Project area during construction and operation activities. Control of pest animals. Pest management actions outlined in the Weed and Pest Management Plan will primarily focus on those pest animals identified within the Project area and include Cane Toads, Feral Cats, Wild Dogs, House Mice and European Rabbits and that have a potential to impact on MNES and their habitat. Additional pests will be included as necessary if identified as occurring within the Project area during the habitat quality monitoring program (European Foxes and Feral Pigs). Pest management will include a range of best management practice actions including shooting, trapping, fencing and baiting in and will be undertaken in accordance with site safety and health requirements, and DAF guidelines and the requirements of the Biosecurity Act 2014 and as permitted under the SHMS. 	<ul style="list-style-type: none"> Observed increase in sightings/signs and/or the relative abundance of pest animals in areas of retained MNES habitat above baseline levels. Direct observation or signs of a pest animal not identified as occurring within the Project area during the baseline surveys. 	<ul style="list-style-type: none"> Monitoring of weeds outside of the disturbance areas will be undertaken during the habitat quality assessment surveys. Monitoring will be undertaken every two years (refer to Section 6.1.4). 	<ul style="list-style-type: none"> Should evidence of pest animals show an increase compared to baseline, undertake an investigation to assess possible reasons for the increase (e.g. inappropriate waste management leading to increased pest animals). Should predation of MNES be observed undertake an investigation to assess possible reasons for the incident(s). Review adherence to the Project's Weed and Pest Management Plan. From the investigation, a Corrective Actions Contingency Plan will be developed by a suitably qualified ecologist within 20 business days of the trigger being detected. The Contingency Plan will include appropriate corrective actions and an implementation schedule for those corrective actions. <p>Corrective Actions:</p> <ul style="list-style-type: none"> Corrective actions identified in the contingency plan will be implemented within 30 days of the trigger being detected. Potential corrective actions may include: 	<ul style="list-style-type: none"> Weed Management Plan in place and implemented. Weeds and Pest management appeared sound with no significant infestations of WoNS or declared (Qld) weeds noted during the site visit. (<i>Field observation</i>). The mining contractor induction package was provided for review. The induction package lacked reference to the EPBC MNES and site requirements (including weeds and pests, machinery washdown, roads & tracks significant fauna, etc.). This highlights an Improvement Opportunity to ensure that induction materials comply with the requirements of the SSMP (<i>Contractor Induction</i>). Opportunity.



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					<ul style="list-style-type: none"> Increasing the frequency and/or duration of pest animal control efforts. Investigating and/or implementing alternate pest animal control methods in consultation with Queensland Department of Agriculture and Fisheries (DAF). Updating the exiting Weed and Pest Management Plan to include new species where relevant. 	
Minimise impact of dust deposition on habitat for MNES during construction and operation of the Project.	<ul style="list-style-type: none"> Dust deposition does not exceed 120 mg per square metre per day, averaged over one month when measured at any sensitive receptor Dust is monitored in accordance with the ID Dust Management Plan. 	<ul style="list-style-type: none"> Dust suppression will be undertaken in accordance with the Dust Management Plan and include the following actions: <ul style="list-style-type: none"> Staging vegetation clearing to minimise areas of disturbed and bare ground. Progressively rehabilitating disturbed areas. Removal and dumping of overburden as soon as reasonably practical following blasting activities Regular watering of haul roads and access tracks in accordance with the CMSHR. Dust suppression spraying of stockpiles. Limiting grading and/or dozing in high dust generating areas. Limiting overburden drilling. Enforcing speed limits in accordance with the requirements of the CMSHA and CMSHR. 	<ul style="list-style-type: none"> Dust deposition levels exceed 120 mg per square metre per day when averaged over one month at sensitive receptors. Visual inspections of vegetation adjacent to the disturbance areas show visible signs of dust deposition. 	<ul style="list-style-type: none"> Monitoring of dust deposition will be undertaken in accordance with EA approval conditions and the Project's Dust Management Plan. Existing monitoring includes visual inspections of vegetation adjacent to the disturbance areas. 	<ul style="list-style-type: none"> If dust deposition monitoring exceeds the trigger value of 120 mg per square metre averaged over one month, Stanmore must investigate whether the exceedance is a result of Project activities and notify the administering authority within seven days of the exceedance occurring. Should an exceedance of dust deposition levels be attributed to Project activities Stanmore will implement dust abatement measures. <p>Corrective Actions:</p> <ul style="list-style-type: none"> Corrective actions identified in the Dust Management plan will be implemented within 10 days of the trigger being detected. 	<ul style="list-style-type: none"> The maximum site speed limit was 60 km/hr and 80 km/hr on haul roads (<i>Field observation</i>). Active dust monitoring data located on the Stanmore website (<i>Stanmore website</i>). Standard operating procedures required dust management in accordance with Dust management Plan and Health and Safety Legislation. The haul road was sealed with bitumen . A dusty overburden dumping circuit was observed, the Open Cut Examiner initiated (via two way radio) slowing of trucks until the water truck was able to attend the circuit, (<i>Dust Management Plan, Field Observation</i>).



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						<ul style="list-style-type: none"> Progressive rehabilitation was observed. (<i>Field Observation</i>).
Minimise noise and vibration impact in areas of MNES habitat.	<ul style="list-style-type: none"> When measured, noise and vibration levels at sensitive receptors do not exceed the general criteria set out in the ID Management Plan. 	<ul style="list-style-type: none"> Regularly maintaining and servicing all plant equipment to minimise machinery noise. All engine covers will be kept closed while equipment is operating. Blasting will only occur between 9am and 7pm. 	<ul style="list-style-type: none"> When measured at sensitive receptors noise and vibration levels exceed criteria set out in the approval conditions. When blasting occurs outside of the approved blast times. 	<ul style="list-style-type: none"> Noise and vibration monitoring will be undertaken in accordance with monitoring requirements set out in the approval conditions. 	<ul style="list-style-type: none"> If noise and vibration monitoring exceed the trigger values outlined, Stanmore must investigate whether the exceedances are the result of the mining activities and notify the administering authority within seven days of the exceedance occurring. Should exceedance levels be attributed to mining activities, noise and vibration abatement measures will be implemented. <p>Corrective Actions:</p> <ul style="list-style-type: none"> Corrective actions identified during investigations will be implemented within 10 days of the trigger being detected. 	<ul style="list-style-type: none"> Machinery was maintained and operated appropriately; no uncharacteristically noisy plant was noted during the site visit (<i>Field observation</i>). 3 blast records for the relevant period were provided with all blast scheduled inside the designated period (<i>Blasting Notification Nov 2023, Jan 2024 and Apr 2024</i>).
Minimise degradation of habitat for MNES from an increased risk of fire due resulting from Project activities.	<ul style="list-style-type: none"> No uncontrolled fires within the Project area resulting from Project related activities. 	<ul style="list-style-type: none"> Fire management for coal mining operations in Queensland is governed by the CMSHA and the CMSHR with the CMSHR prescribing management of fires for coal mines. Section 37 of the CMSHR prescribes that the coal mines Safety and Health Management System (SHMS) must include standard operating procedures for action to be taken when a fire is discovered at the mine. Buffers will be maintained around potential ignition sources such as plant and machinery, haul roads and mine infrastructure areas. Prior to site entry, all relevant site personnel, including contractors, will be made aware of fire safety and risks. Fuel loads will be minimised and managed through the weed control measures outlined in the ID Weed and Pest Management Plan. 	<ul style="list-style-type: none"> An uncontrolled fire occurs within the Project area that is due to mining activities. Weed cover exceeds baseline levels and groundcover biomass (eg vegetation) exceeds benchmark levels. 	<ul style="list-style-type: none"> Compliance with the SHMS will be monitored in accordance with the requirements of the CMSHA and CMSHR. Monitoring of biomass (groundcover including Organic litter) for fire management will be undertaken during the habitat quality assessments that will occur every two (2) years thereafter (refer to Section 6.1.2). 	<ul style="list-style-type: none"> Should an uncontrolled fire occur within the Project area, the existing IPM Emergency Response Plan will be enacted. Should any corrective actions and changes to fire management be required, they will be done in accordance with the CMSHA and CMSHR and incorporated into the SHMS. Should biomass monitoring indicate that there is a risk of an uncontrolled fire occurring, biomass control measures will be assessed by a suitably qualified ecologist within 20 business days and Corrective Actions suggested. Biomass control measures aimed at reducing fuel loads may 	<ul style="list-style-type: none"> No fires were reported in the MNES areas on the Mining Lease during the reporting period. Fire Management was as per Queensland CMSA requirements.



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					<p>include controlled burns, strategic grazing or modified weed management measures.</p> <p>Corrective Actions:</p> <ul style="list-style-type: none"> Any corrective actions identified will be implemented within 30 days of the trigger being detected. 	
<p>Minimise alteration of Squatter Pigeon and Ornamental Snake habitat from changes to water quality and hydraulic activity.</p>	<ul style="list-style-type: none"> Water quality is maintained within the ID Project area and does not exceed the receiving waters trigger levels at downstream monitoring sites listed in the IPM Receiving Environment Monitoring Program which will be updated to include the ID Project. Water quality monitoring is undertaken in accordance with the ID Receiving Environment Monitoring Program. Erosion and sediment control is undertaken in accordance with the Erosion and Sediment Control Plan (ESCP). Maintain riparians habitat quality scores within the retained MNES habitat in relation to baseline habitat quality scores 	<ul style="list-style-type: none"> Site stormwater management will be undertaken in accordance with the management plans and programs required by the approval conditions including a REMP. The site specific WMP, REMP and ESCP as well as other water management requirements as outlined in the approval conditions. Required management plans will be implemented with the aim of minimising alterations to receiving environment water quality erosion, minimising mobilisation of sediments and minimising erosion related disturbances to the current hydrological regime. The maintenance and cleaning of any vehicles, plant or equipment must not be carried out in areas from which contaminants can be released into any receiving waters. Spillage of wastes, contaminants or other materials must be cleaned up as quickly as practicable to minimise the release of wastes, contaminants or materials to any stormwater drainage system or receiving waters. 	<ul style="list-style-type: none"> Water quality monitoring exceeds the approved receiving environment trigger levels outlined in the approval conditions and. Visual inspections of water management infrastructure show signs of failure. The habitat quality score in areas of retained riparian vegetation are not maintained (e.g. habitat falls below the baseline habitat quality score). 	<ul style="list-style-type: none"> Water quality monitoring will be undertaken in accordance with the approval conditions and REMP. Monitoring of the effectiveness of the erosion and sediment control devices and water management infrastructure will be undertaken in accordance with approval conditions. Habitat quality assessments will be undertaken every two (2) years in retained vegetation that provides habitat for MNES 	<ul style="list-style-type: none"> If water quality characteristics of the downstream monitoring point exceed those trigger levels outlined in the final EA, and these levels are higher than upstream monitoring locations, Stanmore must investigate the exceedance and the potential for environmental harm and provide a written report to the administering authority as part of the Project's Annual Return. Should an exceedance of water quality trigger levels be attributed to Project activities, an assessment on the effectiveness of the WMP and REMP will be undertaken, and appropriate Corrective Actions included in Plan revisions and the Annual reports in accordance with approval conditions. Should a decline in the riparian habitat quality scores be observed, the cause will be investigated, and a Corrective Actions Contingency Plan will be developed by a suitably qualified ecologist within 20 business days of the decline being detected. The Plan will include appropriate corrective actions and an implementation schedule for those actions. The 	<ul style="list-style-type: none"> A review of the 2023 water management plan was completed in May 2024 and provided to the department. No non-compliances were identified. Previous report found the machinery wash-bay was a closed system and did not discharge offsite (2023 Report). Oil spill took place and was reported on the 4th of August 2024. The impact was considered low severity and was not considered to be severe enough to report to the department. Clean up was undertaken to recover contaminated material from the Mine industrial area catchment. However, the clean-up response time exceeded internal requirements and highlighted need for a review with the mining contractor. Haul road spillage of coal was located at Billy's Gully crossing. Clean up of spilled coal had been initiated in the preceding months. More frequent clean up visits to the Billy's Gully haul road crossing should be



SSMP Management Objectives	Performance Criteria	Management and Mitigation Measures	Trigger For Further Action	Monitoring	Corrective Actions	Audit Comments
					<p>DAWE will be notified within 20 business days of the decline in habitat quality.</p> <p>Corrective Actions:</p> <ul style="list-style-type: none"> Corrective actions identified will be implemented within 10 days of the trigger being detected. 	<p>scheduled to ensure coal loss to Billys gully is avoided. Opportunity.</p>
<p>Minimise potential for mortality or injury to MNES from Project activities (eg habitat clearing, vehicle strikes etc).</p>	<ul style="list-style-type: none"> No mortality or injury to MNES as a result of Project activities (eg from clearing activities, vehicle strikes etc). 	<ul style="list-style-type: none"> Environmental awareness training will be provided to all workers as part of site induction and will include specific topics on MNES, risks and protective measures, and identification of the MNES. Pre-clearance surveys will be undertaken within 48 hours prior to clearing activities to assess the presence of MNES within the disturbance area to be cleared. At least one qualified Fauna Spotter/Catcher will be present during clearing activities. A wildlife carer will be called to collect any injured fauna. Speed limits of 60 km/hr will be set and enforced on all internal roads including haul roads, with the exception of creek crossings at night which will have 40 km/hr limits. Vehicles must abide by vehicle speed limits and access to any restricted areas or exclusion zones must be limited to critical site-specific activities to minimise threats to MNES. All injured fauna encountered during the construction and operation of the activity will be taken to a wildlife carer/facility or veterinarian within 24 hours. Where injured fauna is encountered, and it is unsafe to handle the animals, the following should be undertaken The location of the injured animal will be identified so it can be located again The species of animal will be identified if possible and its sex and approximate size determined The type of injury sustained will be identified if possible The EO shall immediately contact Queensland's Department of Environment and Science (DES) and report the animal and arrange for its capture 	<ul style="list-style-type: none"> Injury or mortality to an MNES 	<ul style="list-style-type: none"> All personnel will be required to be report any interactions between vehicles and/or /machinery and MNES in the Project area. Visual observations during normal working hours. Incidental observations during habitat quality assessments. 	<ul style="list-style-type: none"> Should an injury to, or mortality of, an MNES, an investigation will be undertaken to ascertain the cause of the injury or mortality. Should the injury or mortality be attributed to mining activities, a Contingency Plan will be developed by a suitably qualified ecologist within 20 business days and will include Corrective Actions and an implementation schedule for the Corrective Actions. <p>Corrective Actions:</p> <ul style="list-style-type: none"> Corrective actions identified in the contingency plan will be implemented within 30 days of the trigger being detected. 	<ul style="list-style-type: none"> The mining contractor induction package was provided for review. The induction package lacked reference to the EPBC MNES and site requirements (including weeds and pests, machinery washdown, roads & tracks significant fauna, etc.). This highlights an Improvement Opportunity to ensure that induction materials comply with the requirements of the SSMP (<i>Contractor Induction</i>). Opportunity. Fauna Spotters were not listed as required on the PTDs (as per the SMP). During the period of the Report only a previously cleared area which had re-grassed was the subject of inspection by spotter catcher prior to re-disturbance. No injured wildlife recorded during recent clearing works. The maximum site speed limit was generally 60 km/hr however the limit on the haul road between Isaac Downs and the CHPP was 80 km/hr. The haul road speed limit is contradictory to requirements of the SSMP. Furthermore, the



SSMP Management Objectives	Performance Criteria	Management and Mitigation Measures	Trigger For Further Action	Monitoring	Corrective Actions	Audit Comments
		and transportation to a wildlife carer or veterinarian.				40 km/hr night time speed limit was not signed and training of operators in the requirement was not evidenced, (<i>Field observation</i>).



A.4 GDEMMP Objectives Audit

Objective	Comments	Compliance
Characterise GDEs that are likely to be impacted by the ID Project in terms of ecological function, interaction with surface water and interaction with groundwater as presented in 3d Environmental (2020a).	The GDEs that are likely to be impacted by the project are outlined in section 4 of the GDEMMP. Figure 8 outlines the location of GDE areas within the vicinity of the ID project area.	Previous GDEMMP found compliant. No updated version received.
Provide a synopsis of the potential risks to GDE integrity posed by mining activities associated with the ID Project.	Section 5 outlines the major risks to GDE function associated with the ID project. The locations of potential impacts are outlined in Figure 10. Table 1 provides a description and ranking for the likelihood of impact to GDE health.	Previous GDEMMP found compliant. No updated version received.
Identify biophysical parameters that can be applied to the monitoring of GDE function that can be repeated objectively and consistently throughout the life of the ID Project to measure GDE health.	Table 2 outlines the assessment methodology, including biophysical parameters to be applied during GDE monitoring events.	Previous GDEMMP found compliant. No updated version received.
Describe the most appropriate actions to measure changes to biophysical function of GDEs that may indicate a decline in GDE health and provide a statistically robust framework that can demonstrate whether impacts to GDEs are associated with mining activities rather than natural variation.	The GDE monitoring approach is outlined in section 7 and monitoring and analysis techniques are outlined in section 8 . The techniques and approach describe the most appropriate actions for measuring the changes to biophysical function in GDEs.	Previous GDEMMP found compliant. No updated version received.
Develop triggers that may be used to initiate the application of corrective actions, which can be refined over time as monitoring data is collected.	Triggers for investigative action are outlined in section 10 of the GDEMMP.	Previous GDEMMP found compliant. No updated version received.
Develop a suite of corrective actions that may be applied to ameliorate impacts to GDEs and prevent or repair declining GDE health.	Section 11 outlined the potential corrective actions and adaptive management that can be applied to ameliorate the impact to GDEs.	Previous GDEMMP found compliant. No updated version received.
Develop disturbance thresholds and offset requirements should corrective actions not be successful.	Section 11.4 outlined the triggers for ecological offset should corrective actions not be successful.	Previous GDEMMP found compliant. No updated version received.





Appendix B Site Visit and Evidence Photos

EPBC Act Annual Compliance Report 2024

Isaac Downs – EPBC Act Referral 2019/8413

Stanmore Resources Limited

SLR Project No.: 626.030235.00001



5 November 2024

Observed Location	Field Images
Dust Suppression	
Approved Limit of disturbance markers and fences	

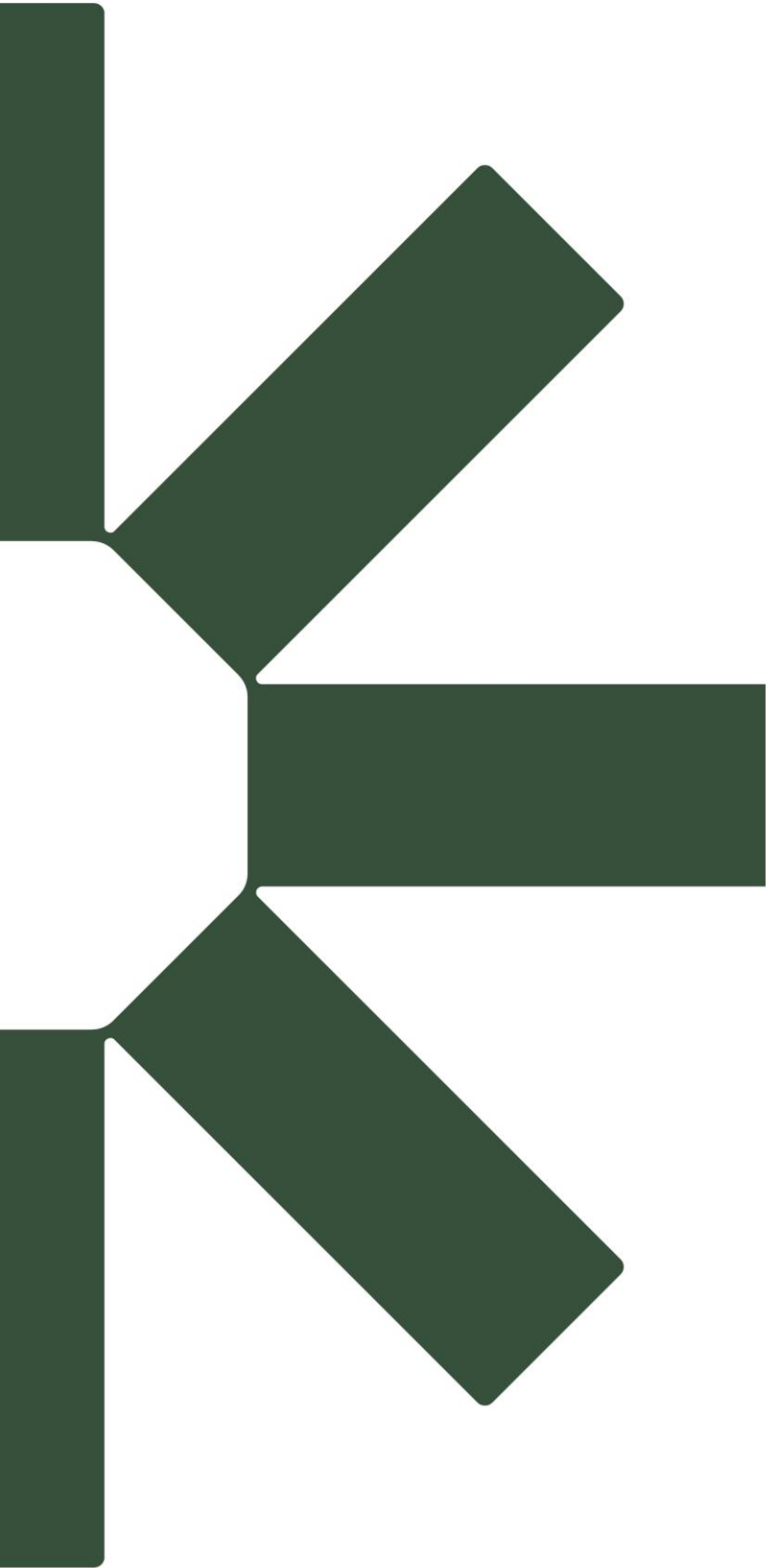


Observed Location	Field Images
<p>MNES Species Bench Seat, Signage and Environmental Guidelines</p>	  
<p>Haul Road Speed Limit</p>	



Observed Location	Field Images
Sealed Haul Road	
Spill kits & recycle bins	





Making Sustainability Happen