



CAZALY IRON PTY LTD

PARKER RANGE
(MT CAUDAN) IRON ORE PROJECT

2018 - 2019 COMPLIANCE
ASSESSMENT REPORT

(THIS REPORT HAS BEEN PRODUCED FOR SUBMISSION TO THE OFFICE OF THE ENVIRONMENTAL PROTECTION AUTHORITY IN ACCORDANCE WITH CONDITIONS OF MINISTERIAL STATEMENT NO. 892)

Proponent: ***Cazaly Iron Pty Ltd***

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APPENDIX 1 – STATEMENT OF COMPLIANCE

1.0 INTRODUCTION

1.1 BACKGROUND

Cazaly Iron Pty Ltd (Cazaly) received approval by the Minister for Environment; Water (Hon Bill Marmion) on 12 April 2012 to develop the Parker Range (Mt Caudan) Iron Ore Project (Project) approximately 15 km southeast of the town of Marvel Loch in the Shire of Yilgarn in the Eastern Wheatbelt of Western Australia.

Cazaly propose to mine iron ore from the Parker Range deposit by conventional open pit hard rock mining methods at a rate of approximately 4 Mtpa. The estimated life of the mine is 8.5 years based on current economically mineable JORC resources.

Approximately 31 Mt of waste rock is expected to be generated from the mining operation.

This Compliance Assessment Report (CAR) covers the Project's status of compliance with Ministerial Statement 892 (issued to Cazaly on the 12 April 2012) for the period 12 April 2018 to 12 April 2019.

The Environmental Protection Authority (EPA) issued Ministerial Statement 1060 to Cazaly on the 17 July 2017 to amend Condition 3 on Ministerial Statement 892 to extend the time limit of authorisation to the 12 April 2022.

At this point in time, the proposed Project has not been implemented.

1.2 OBJECTIVES

The objective of this document is to provide a CAR to the Chief Executive Officer (CEO) of the Office of the Environmental Protection Authority (OEPA) in accordance with condition 4-6 of Ministerial Statement No. 892 and the Compliance Assessment Plan approved on 12 July 2013.

1.3 LOCATION

The Project is located approximately 52 km south of Southern Cross and 15 km southeast of Marvel Loch.

1.4 PROPONENT

Relevant information for Cazaly is:

Address:	Level 2, 38 Richardson Street WEST PERTH WA 6005 PO Box 396 WEST PERTH WA 6872
Telephone:	08 9322 6283
Facsimile:	08 9322 6398
ABN:	56 110 981 783
Directors:	Clive Jones Nathan McMahon Kent Hunter

2.0 COMPLIANCE AUDIT TABLE

PROJECT – PARKER RANGE (MOUNT CAUDAN) IRON ORE PROJECT - SHIRE OF YILGARN

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- Code prefixes: M = Minister's condition, P = Proponent's commitment.
- Acronyms list: CEO = Chief Executive Officer of the OEPA; DEC = Department of Environment and Conservation (now separately DBCA (Department of Biodiversity, Conservation and Attractions and DWER (Department of Water and Environmental Regulation)); DIA = Department of Indigenous Affairs (now DPLH (Department of Planning Lands and Heritage)); DMP = Department of Mines and Petroleum (now Department of Mines, Industry Regulation and Safety (DMIRS)); EPA = Environmental Protection Authority; DoH = Department of Health; DoW = Department of Water (Amalgamated into DWER), Minister for Env = Minister for the Environment; OEPA = Office of the Environmental Protection Authority.
- Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non-compliant, NR = Not Required at this stage. Please note the terms VR = Verification Required and IP = In Process are only for OEPA use.

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status	Further information
892:M1.1	Proposal Implementation	The proponent shall implement the proposal as documented and described in schedule 1 of this statement subject to the conditions and procedures of this statement.	Implement project in accordance with criteria outlined in Schedule 1.	Compliance Assessment Report.	Min for Env		Overall	Ongoing	NR	Project not commenced.
892:M2.1	Proponent Nomination and Contact Details	The proponent for the time being nominated by the Minister for Environment under sections 38(6) or 38(7) of the <i>Environmental Protection Act 1986</i> is responsible for the implementation of the proposal.	Notify of any change in proponent details in writing.	Compliance Assessment Reports identifying the name of Cazaly (the proponent).	Min for Env		Overall	Ongoing	C	Cazaly remains the proponent.
892:M2.2	Proponent Nomination and Contact Details	The proponent shall notify the Chief Executive Officer of the Office of the Environmental Protection Authority (CEO) of any change of the name and address of the proponent for the serving of notices or other correspondence within 30 days of such change.	Notify the CEO of any change in proponent details in writing.	Copy of written notification of the CEO of any change in proponent details.	CEO		Overall	Within 30 days of such change	NR	No change.
892:M3.1	Time Limit of Authorisation	The authorisation to implement the proposal provided for in this statement shall lapse and be void five years after the date of this statement if the proposal to which this statement relates is not substantially commenced.	Notify in writing.	Copy of written notification to CEO of substantial commencement.	CEO		Overall	Prior to 12 April 2022	NR	Project not commenced. Cazaly submitted a request to the EPA on 28 June 2016 (s46) to extend MS892 commencement timeframe to 12 April 2022. The EPA issued Statement 1060 on the 17 July 2017 to amend Condition 3 on Ministerial Statement 892 to extend the time limit of authorisation to 12 April 2022.
892:M3.2	Time Limit of Authorisation	The proponent shall provide the CEO with written evidence which demonstrates that the proposal has substantially commenced on or before the expiration of five years from the date of this statement.	Provide evidence to the CEO in writing to demonstrate the proposal has substantially commenced. Include photographs.	Copy of written notification to CEO of substantial commencement.	CEO		Overall	Prior to 12 April 2022	NR	Project not commenced.
892:M4.1	Compliance Reporting	The proponent shall prepare and maintain a compliance assessment plan to the satisfaction of the CEO.	Preparation of a Compliance Assessment Plan (CAP) and an audit table in compliance with the requirements of the OEPA.	Approved CAP. Endorsement of CAP by OEPA.	CEO		Overall	Originally due by 12 January 2013, then 28 June 2013.	C	CAP submitted to the OEPA 28 June 2013. Final CAP re-submitted 10 July 2013, approved 12 July 2013.
892:M4.2	Compliance Reporting	The proponent shall submit to the CEO the compliance assessment plan required by condition 4-1 at least six months prior to the first compliance report required by condition 4-6, or prior to implementation, whichever is sooner. The compliance assessment plan shall indicate: 1. the frequency of compliance reporting; 2. the approach and timing of compliance assessments; 3. the retention of compliance assessments; 4. the method of reporting of potential non-compliances and corrective actions taken; 5. the table of contents of compliance assessment reports; and 6. public availability of compliance assessment reports.	The compliance assessment plan shall indicate: 1. the frequency of compliance reporting; 2. the approach and timing of compliance assessments; 3. the retention of compliance assessments; 4. Reporting of potential non-compliances and corrective actions taken; 5. the table of contents of compliance reports; and 6. public availability of compliance reports.	Approved CAP. Endorsement of CAP by OEPA.	CEO		Pre-construction	Originally due by 12 January 2013, then 28 June 2013.	CLD	CAP submitted to the OEPA 28 June 2013. Final CAP re-submitted 10 July 2013, approved 12 July 2013.
892:M4.3	Compliance Reporting	The proponent shall assess compliance with conditions in accordance with the compliance assessment plan required by condition 4-1.	As specified in the CAP.	Submission and acknowledgement of receipt of completed audit table by OEPA.	Min for Env		Overall	Ongoing	C	Completion of this audit table fulfills this condition.
892:M4.4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the compliance assessment plan required by condition 4-1 and shall make those reports available when requested by the CEO.	Records and reports will be maintained in accordance with Cazaly's document management system requirements so that they can be retrieved if requested.	Availability at the request of the CEO.	CEO		Overall	When requested by the CEO.	C	No requests received.

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status	Further information
892:M4.5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within seven days of that non-compliance being known.	Notification to CEO in writing.	Copy of written notification and acknowledgement of receipt of notification by OEPA.	CEO		Overall	Within 7 days of non-compliance being known.	C	No non-compliances in this period.
892:M4.6	Compliance Reporting	The proponent shall submit to the CEO the first compliance assessment report fifteen months from the date of issue of this statement addressing the twelve month period from the date of issue of this statement and then annually from the date of submission of the first compliance assessment report. The compliance assessment report shall: 1. be endorsed by the proponent's Managing Director or a person delegated to sign on the Managing Director's behalf; 2. include a statement as to whether the proponent has complied with the conditions; 3. identify all potential non-compliances and describe corrective and preventative actions taken; 4. be made publicly available in accordance with the approved compliance assessment plan; and 5. indicate any proposed changes to the compliance assessment plan required by condition 4-1.	In accordance with CAP.	Acknowledgement of receipt of CAR by OEPA. Endorsement of CAR by Director. CAR uploaded to Cazaly website.	CEO		Overall	The first CAR was required to be submitted by 12 July 2013. A CAR is required annually on 12 th July from the date of submission of the first CAR.	C	The first CAR was submitted by Cazaly to the CEO 12 July 2013. Placed on the Cazaly website on 31 July 2013. Submission of this CAR and required content fulfills the annual CAR requirements.
892:M5.1	Public Availability of Data	Subject to condition 5-2, within three months of approval by the CEO and for the remainder of the life of the proposal the proponent shall make publicly available, in a manner to the satisfaction of the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)) relevant to the assessment of this proposal and implementation of this statement.	Access to environmental data via Cazaly website, or, via a request form on the Cazaly website with supply of the report within 7 days.	Availability of data.	CEO		Overall	Ongoing	C	Verification was provided to OEPA on 31 July 2013 of fulfilment of this condition. No requests for access to data received by Cazaly via their website.
892:M5.2	Public Availability of Data	If any data referred to in condition 5-1 would: i. involve the disclosure of any data which is confidential or commercially sensitive to the proponent or a third party including any model, formula or process which is a trade secret; or ii. involve an infringement of copyright held by a third party, the proponent may submit a request for approval from the CEO to not make this data publically available. In making such a request the proponent shall provide the CEO with the data and an explanation and reasons why the data should not be made publically available.	Submission of request for approval from the CEO to not make this data publicly available.	Acknowledgement of request and acceptance by the OEPA.	CEO		Overall	Ongoing	NR	No requests for access to data received by Cazaly via their website.
892:M6.1	Flora and Vegetation	The proponent shall undertake monitoring of the health and abundance of vegetation within a 250 metre buffer area around areas approved for disturbance at the mine site and within a 125 metre buffer around the upper haul road as illustrated in Figures 4 and 5 in schedule 1.	Environmental monitoring in accordance with M6.2	Vegetation Monitoring Report submitted with CAR.	Min for Env		Pre-construction then Overall	Ongoing	NR	Ground disturbing activities not yet commenced. Initial baseline surveys conducted in Spring of 2011.
892:M6.2	Flora and Vegetation	The monitoring required under condition 6-1 is to commence prior to ground disturbing activities required for the implementation and operation of the proposal and be carried out to the requirements of the CEO on advice of the Department of Environment and Conservation (DEC) and will include: 1. the provision of baseline data; 2. identification of baseline and control sites; 3. definition of monitoring frequency, timing, intensity and replication; 4. definition of health and abundance; 5. identification of what and how parameters will be used to measure decline or rate of decline in health or abundance; and 6. definition of management responses required should a 25 per cent (or greater) decline in health or abundance be recorded.	Environmental monitoring in accordance with M6.2	Monitoring Report submitted with CAR.	CEO	DEC	Pre-construction then Overall	Ongoing	NR	Ground disturbing activities not yet commenced. Initial baseline surveys were conducted in Spring of 2011.
892:M6.3	Flora and Vegetation	Should the potential impact sites show a 25 per cent (or greater) decline in health or abundance as compared to the reference sites, the proponent shall provide a report to the CEO within 21 days of the decline being identified which: 1. describes the decline; and 2. provides information which allows determination of the likely root cause of the decline.	Provide report to the CEO of the decline being identified.	Acknowledgement of receipt of report by OEPA within 21 days of the decline being identified.	CEO		Overall	Within 21 days of the decline being identified.	NR	Ground disturbing activities not yet commenced.

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status	Further information
892:M6.4	Flora and Vegetation	If the decline in health or abundance identified in condition 6-3 is determined by the CEO to be caused by activities undertaken in implementing the proposal the proponent shall implement the actions identified in condition 6-2-6 and continue to implement such actions until the CEO determines that the remedial actions may cease.	Implementation of actions in accordance with 6.2.6.	Correspondence with OEPA.	CEO		Overall	Ongoing	NR	Ground disturbing activities not yet commenced.
892:M6.5	Flora and Vegetation	The proponent shall undertake weed management to ensure that: 1. No new species of declared weeds and environmental weeds are introduced into the proposal area and that the abundance and distribution of existing weeds is not increased as a direct or indirect result of implementation of the proposal. 2. Prior to ground disturbing activities the proponent shall undertake a baseline weed survey to determine the species and extent of declared weeds and environmental weeds present at weed monitoring sites within the project footprint including the mine area (schedule 1 Figure 2) and the upper haul road (schedule 1 Figure 3) and at least three reference sites on nearby undisturbed land beyond 200 metres from the disturbance footprint in consultation with the DEC. 3. To determine whether changes in weed cover and type within the project footprint have occurred and are likely to have resulted from implementation of the proposal or broader regional changes, monitoring of baseline and reference sites surveyed as required by condition 6-5-2 shall commence within one year after initial ground disturbing activity required for the implementation of the proposal. These sites are to be monitored annually for two years during the time of year agreed to by the CEO on advice of the DEC. Thereafter monitoring shall take place at least every two years at the time of year agreed above for the life of the proposal, with monitoring within a two year period to coincide with the year of any favourable rainfall events. 4. If the results of monitoring under condition 6-5-3 indicate that adverse changes in weed cover and type within the project footprint are proposal attributable, the proponent shall report the monitoring findings to the CEO and DEC within three months of completion of the monitoring and shall immediately undertake weed control and rehabilitation in the affected areas, where proposal attributable weed cover has adversely changed, using native flora species of local provenance. 5. The proponent shall continue to implement the remedial measures required by condition 6-5-4 until approval is given by the CEO to cease.	Weed monitoring plan to be developed and implemented.	Weed monitoring report submitted annually with CAR.	CEO, DEC	DEC	Pre-construction then Overall	Ongoing	NR	Ground disturbing activities not yet commenced. Initial baseline survey conducted in 2011, no weeds recorded.
892:M7.1	Conservation Significant Flora	The proponent shall ensure that there is no loss of plants of the Declared Rare Flora species <i>Isopogon robustus</i> due to ground disturbing activities.	DRF monitoring plan to be developed and implemented.	DRF monitoring report submitted annually with CAR.	Min for Env		Overall	Ongoing	NR	Ground disturbing activities not yet occurred.
892:M7.2	Conservation Significant Flora	The proponent shall ensure the long term maintenance of genetic diversity of the <i>Lepidosperma</i> sp. Parker Range and of <i>Lepidosperma</i> sp. Mt Caudan species within the Parker Range region through the following actions: 1. Prior to ground disturbing activities required for the implementation and operation of the proposal, the proponent shall collect seed and plant material of the <i>Lepidosperma</i> sp. Parker Range and <i>Lepidosperma</i> sp. Mt Caudan populations that will be cleared as a result of this proposal. The seed and plant material will be vested in an appropriate facility which can ensure long-term viability of seed storage and protection of identified mother stock of genetic significance for storage and approved restoration works to the satisfaction of the CEO on advice of the DEC 2. The proponent shall undertake genetic analysis including: a. Spatial analysis of population genetic structure; b. Genetic analysis of the mating system; and c. Genetic analysis of realized dispersal, to the satisfaction of the CEO to determine the relative genetic diversity of the populations of <i>Lepidosperma</i> sp. Parker Range and populations	Implementation of actions as required by M7.2.	Written notification from DEC re: appropriateness of proposed seed storage and stock. Written notification of storage details. Submission of Genetic Analysis report with CAR.	CEO	DEC	Overall	Prior to ground disturbance. Ongoing	NR CLD	Ground disturbing activities not yet occurred. Collection and storage of plant material completed, seeds yet to be collected (not in seed) – ongoing discussions with DPaW. Genetic analysis completed by DPaW to fulfil this requirement. Report has been forwarded to the OEPA in the 2016 CAR.

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status	Further information
		of <i>Lepidosperma</i> sp. Mt Caudan using the seed and plant material collected in accordance with condition 7-2-1. 3. The proponent shall develop a rehabilitation and research program within six months of ground disturbing activities for Priority flora species with particular focus on the species <i>Lepidosperma</i> sp. Parker Range to the satisfaction of the CEO on advice of the DEC. This program shall: a. include a time or timeframe for commencement and completion of the rehabilitation and research program; b. focus on shallow soil analysis, water use efficiency, restoration practices, transplantation trials and seed trials; c. be undertaken in consultation with the DEC; and d. be based on the nature of the impact on genetic diversity determined in condition 7-2-2.		Submission of results of action required by a rehabilitation and research program in the CAR.					NR	Ground disturbing activities not yet commenced.
892:M7.3	Conservation Significant Flora	Prior to ground disturbing activities required for the implementation and operation of the proposal the proponent shall undertake a targeted survey of <i>Chamelaucium</i> sp. Parker Range to the satisfaction of the CEO on the advice of the DEC to determine the local and regional impact to this species.	Undertake a targeted survey of <i>Chamelaucium</i> sp. Parker Range to the satisfaction of the CEO on the advice of the DEC to determine the local and regional impact to this species.	Acknowledgement from DEC on adequateness of the report. Submission of survey report with CAR.	CEO	DEC	Pre-construction	Prior to ground disturbance.	NR	Survey report submitted to the OEPA on 6 August 2012 (A533664). OEPA requested that additional information re: regional and local impacts be incorporated into a revised report to be submitted by 9 August 2013. On 6 August 2013, Cazaly forwarded a letter to the OEPA requesting concurrence for the revised report to be submitted prior to ground disturbing activities (in accordance with the condition). The OEPA granted approval for the amended wording on 27 July 2016.
892:M7.4	Conservation Significant Flora	The proponent shall provide a copy of the survey report required in condition 7-3 to the CEO and the DEC within three months of completion.	Submission of the targeted survey report to the CEO and DEC within 3 months.	Acknowledgement from the OEPA and DEC of receipt of report.	CEO, DEC		Pre-construction	Within 3 months of completion of report.	NR	Survey report submitted to the OEPA on 6 August 2012 (A533664). This was within three months of completion. Revised report (refer to above for details) will be submitted within 3 months of completion.
892:M7.5	Conservation Significant Flora	The proponent shall ensure that due to ground disturbing activities: <ul style="list-style-type: none"> there are no indirect impacts to the Declared Rare Flora <i>Isopogon robustus</i>; and that indirect impacts to Priority 1 flora <i>Lepidosperma</i> sp. Mt Caudan do not result in a loss of health and abundance outside the project footprint. 	Undertake monitoring in accordance with M7.6 and M7.7.	Submission of monitoring results with CAR.	Min for Env		Overall	Ongoing	NR	Proposal not yet implemented (i.e. no ground disturbance), not required at this stage.
892:M7.6	Conservation Significant Flora	To verify the requirements of 7-5 are met the proponent shall undertake monitoring in accordance with condition 7-7 of the health and abundance of declared rare flora <i>Isopogon robustus</i> and Priority 1 flora <i>Lepidosperma</i> sp. Mt Caudan at reference and potential impact sites	Undertake environmental monitoring in accordance the monitoring plan required in accordance with M7.7.	Submission of monitoring results with CAR.	Min for Env		Pre-construction then Overall	Ongoing	NR	Proposal not yet implemented (i.e. no ground disturbance), not required at this stage.
892:M7.7	Conservation Significant Flora	To meet the requirements under condition 7-6 the proponent shall prepare a monitoring plan prior to ground disturbing activities for the approval of the CEO on advice of the DEC. The monitoring plan shall include: <ol style="list-style-type: none"> the provision of baseline data; identification of baseline and control sites; definition of monitoring frequency, timing, intensity and replication; definition of health and abundance; identification of what and how parameters will be used to measure decline or rate of decline in health or abundance; and definition of trigger levels and management responses. 	Preparation of monitoring plan in accordance with the DEC.	Written notification of submission and written approval of the plan from the OEPA.	CEO	DEC	Pre-construction then Overall	NR	Proposal not yet implemented (i.e. no ground disturbance), monitoring not required at this stage.	
892:M7.8	Conservation Significant Flora	Should the potential impact sites show a decline in health or abundance as determined by condition 7-7 compared to the reference sites the proponent shall provide a report to the CEO within 21 days of the decline being identified which: <ol style="list-style-type: none"> describes the decline; and provides information which allows determination of the likely root cause of the decline. 	Preparation and submission of report outlining the decline within 21 days to the OEPA.	Acknowledgement of receipt of report by OEPA within 21 days.	CEO		Overall	Within 21 days of the decline being identified.	NR	Proposal not yet implemented, not required at this stage.

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status	Further information
892:M7.9	Conservation Significant Flora	If the decline in health or abundance identified in conditions 7-7 and 7-8 is determined by the CEO to be caused by activities undertaken in implementing the proposal the proponent shall, implement the actions identified in condition 7-7-6 and continue to implement such actions until the CEO determines that the remedial actions may cease.	Implement the actions identified in the monitoring plan.	Remedial actions to be presented in the CAR and advised to the OEPA.	CEO		Overall	Ongoing	NR	Proposal not yet implemented, not required at this stage.
892:M8.1	Fauna	The proponent shall avoid, or where this is unavoidable minimise the loss of conservation significant fauna such as the Malleefowl (<i>Leipoa ocellata</i>), Western Rosella (<i>Platycerus icterotis xanthogenys</i>) and the White-browed Babbler (<i>Pomatostomus superciliosus</i>).	Maintenance of speed limits. Disturbance limited to that in Schedule 1.		Min for Env		Overall	Ongoing	NR	Proposal not yet implemented (i.e. no ground disturbance), not required at this stage.
892:M8.2	Fauna	To meet the requirements of condition 8-1 the proponent shall ensure that a maximum 40 kilometre per hour speed limit is enforced on all roads within the mine area as indicated in Figure 2 of schedule 1 (with the exception of the Parker Range Bypass Road public road) and a maximum of 60 kilometres per hour along the upper haul road as indicated in Figure 3 of schedule 1 during implementation of the proposal.	Enforcement of all speed limits.	Random monitoring of vehicle speeds by Cazaly Environment staff and reported in the CAR.	Min for Env		Overall	Ongoing	NR	Proposal not yet implemented, not required at this stage.
892:M8.3	Fauna	The proponent shall record and report the death or injury of any fauna protected under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> and/or Scheduled species under the <i>Wildlife Conservation Act 1950</i> as a result of the implementation of this proposal to the CEO on the advice of the DEC within seven days of that death or injury being known.	Maintenance of records and notification to the OEPA of any death or injury of fauna protected under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> and/or Scheduled species under the <i>Wildlife Conservation Act 1950</i>	Submission of records and acknowledgement from the OEPA on receipt of notification.	CEO		Overall	Within 7 days of that injury or death being known.	NR	Proposal not yet implemented, not required at this stage.
892:M8.4	Fauna	The proponent may clear one inactive Malleefowl (<i>Leipoa ocellata</i>) mound within the mine footprint at the following coordinates 741160E and 6498677N identified in schedule 1 Figure 6.	Clearing limited to only that approved.	Clearing undertaken to be reported in CAR.	Min for Env		Pre-construction	During clearing activities.	NR	Proposal not yet implemented, not required at this stage.
892:M8.5	Fauna	The proponent shall ensure that the proposal does not adversely affect the population size of Malleefowl populations within one kilometre of the project area as identified in schedule 1 Figure 7.	Development and implementation of the Malleefowl Management Plan.	Results of monitoring to be reported in CAR.	Min for Env		Overall	Ongoing	NR	Proposal not yet implemented, not required at this stage.
892:M8.6	Fauna	To verify that the requirements of Condition 8-5 are met the proponent shall prepare a Malleefowl management plan prior to ground disturbing activities to the satisfaction of the CEO on advice of the DEC which requires the: 1. submission of baseline monitoring of Malleefowl habitat and, active and inactive Malleefowl mounds, within one kilometre of the proposal area (schedule 1 Figure 7), prior to ground disturbing activities; 2. the determination of a level of impact including the reduction in number of active Malleefowl mounds and number of Malleefowl deaths based on the results of condition 8-6-1 which would indicate an adverse impact to local Malleefowl populations; and 3. monitoring of the numbers of active mounds and numbers of inactive mounds as identified in condition 8-6-1. This monitoring is to be carried out to the requirements of the CEO on advice of the DEC.	Development and implementation of the Malleefowl Management Plan. Monitoring undertaken in accordance with the Plan.	Written approval for the Malleefowl Management Plan. Results of monitoring to be reported in CAR.	CEO	DEC	Pre-construction Then Overall	Prior to ground disturbing activities.	NR	Proposal not yet implemented (i.e. no ground disturbance), not required at this stage.
892:M8.7	Fauna	In the event that fauna mortalities reported under condition 8-3 and monitoring required by condition 8-6 indicate an adverse impact as defined under condition 8-6-2 on the abundance of the Malleefowl population within one kilometre of the proposal area: 1. the proponent shall report such findings to the CEO and the DEC within 21 days of the decline being identified; 2. provide to the CEO the results of an investigation into the findings and the potential cause of the decline; 3. if the adverse impact is determined by the CEO to be significant and a result of activities undertaken in implementing the proposal, the proponent shall submit actions to be taken to remediate the decline to the CEO within 21 days of the determination made by the CEO; and 4. the proponent shall implement actions to remediate the decline in the health or abundance of Malleefowl populations upon approval of the CEO and shall continue until such time the CEO on the advice of the DEC determines that the remedial actions may cease.	1. Report such findings to the CEO and the DEC within 21 days of the decline being identified; 2. provide to the CEO the results of an investigation into the findings and the potential cause of the decline; 3. if the adverse impact is determined by the CEO to be significant and a result of activities undertaken in implementing the proposal, the proponent shall submit actions to be taken to remediate the decline to the CEO within 21 days of the determination made by the CEO; and 4. the proponent shall implement actions to remediate the decline in the health or abundance of Malleefowl populations upon approval of the CEO and shall continue until such time the CEO on the advice of the DEC determines that the remedial actions may cease.	Acknowledgement of receipt of reports from the OEPA. Results to be presented in the CAR.	CEO, DEC		Overall	1. Within 21 days of the decline being identified. 2. Within 21 days of determination of significant adverse impact. 3. Ongoing	NR	Proposal not yet implemented, not required at this stage.

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status	Further information
892:M9.1	Trench Management	The proponent shall ensure that open trenches associated with construction of underground pipelines are cleared of trapped fauna by fauna-rescue teams at least twice daily. Details of all fauna recovered shall be recorded, consistent with condition 9-5. The first daily clearing shall take place no later than three hours after sunrise and shall be repeated between the hours of 3:00 pm and 6:00 pm. The open trenches shall also be cleared of trapped fauna by fauna-rescue teams, and fauna details recorded, no more than half an hour prior to backfilling of trenches.	A minimum of twice daily inspections of open trenches associated with construction of underground pipelines and clearing of trapped fauna.	Reporting of daily inspection records in the trench and fauna management report to DEC and in the CAR.	Min for Env		Construction	A minimum of twice daily inspections during construction no later than 3 hours after sunrise and repeated between 3-6pm). Ongoing during construction.	NR	Proposal not yet implemented, not required at this stage.
892:M9.2	Trench Management	The proponent shall ensure that a suitable number of fauna-rescue personnel involved in trench management shall obtain the appropriate licences as required for fauna rescue under the <i>Wildlife Conservation Act 1950</i> prior to undertaking actions required by condition 9-1.	Ensure all fauna rescue personnel have appropriate fauna licences for fauna rescue.	Reporting of fauna personnel licence information in trench and fauna management report (M9.6) and CAR.	Min for Env		Construction	During construction.	NR	Proposal not yet implemented, not required at this stage.
892:M9.3	Trench Management	Open trench lengths shall not exceed a length capable of being inspected and cleared by the fauna-rescue teams within the required times as set out in condition 9-1. The length of trench that each fauna rescue team may inspect and clear in one day is not to exceed six kilometres per clearing period, unless otherwise agreed by the CEO on advice of the DEC.	The length of trench that each fauna rescue team may inspect and clear in one day is not to exceed six kilometres per clearing period, unless otherwise agreed by the CEO on advice of the DEC.	Results of daily inspections in trench and fauna management report (M9.6) and CAR. Written agreement from CEO where 6km is to be exceeded.	CEO	DEC	Construction	During construction.	NR	Proposal not yet implemented, not required at this stage.
892:M9.4	Trench Management	Trenches shall remain open no longer than 90 days without prior approval of the CEO.	Approval from CEO to be sought where trenches to remain open longer than 90 days.	Written approval from the CEO.	CEO		Construction	During construction.	NR	Proposal not yet implemented, not required at this stage.
892:M9.5	Trench Management	Ramps with angles of repose no greater than 12 degrees, providing egress points and/or fauna refuges providing suitable shelter from the sun and predators for trapped fauna are to be placed in the trench at intervals not exceeding 50 metres	Installation of ramps, suitable egress points and suitable shelter at intervals not exceeding 50m.	Results of daily inspections in trench and fauna management report (M9.6) and CAR.	Min for Env		Construction	During construction.	NR	Proposal not yet implemented, not required at this stage.
892:M9.6	Trench Management	The proponent shall produce a report on trench and fauna management within the open trenches to be provided to the CEO and the DEC no later than 21 days after the completion of underground pipeline installation. The report shall include the following: 1. the dates of when specific sections of the trench (or the entirety thereof) were opened and closed; 2. details of all fauna inspections including any dates when fauna inspections were not undertaken; 3. details of the fauna teams undertaking the works (i.e. names and accreditations); 4. the number and species of fauna cleared from trenches and their release location details; and 5. fauna injuries and mortalities including where required under the licence, vouchering of specimens to the standard required by the Museum of Western Australia.	Submission of report on trench and fauna management to the CEO no later than 21 days after the completion of underground installation.	Acknowledgement of receipt of the report from the OEPA.	CEO, DEC		Construction	No later than 21 days after the completion of underground pipe installation.	NR	Proposal not yet implemented, not required at this stage.
892:M9.7	Trench Management	In the event of a forecast of rainfall likely to cause partial or complete flooding of an open trench, all lengths of trench with potential to be flooded should be backfilled, with trench inspections and fauna clearing undertaken immediately prior to backfilling. The decision on whether the trench should be backfilled shall be undertaken in consultation with the DEC Department of Environment and Conservation	Liaise with the DEC as to the requirement for trench backfilling where flooding could occur. When rainfall is forecast that is likely to cause partial or complete flooding of trenches.	Acknowledgement of consultation from the DEC.	Min for Env	DEC	Construction	Prior to the rainfall event	NR	Proposal not yet implemented, not required at this stage.
892:M9.8	Trench Management	All mortalities of fauna listed in Schedule 1 and Schedule 2 of the <i>Wildlife Conservation Act 1950</i> including the cause, location, number, species and any actions shall be reported and taken to the CEO and the DEC within 48 hours of the mortality being identified.	Reporting of all fauna mortalities to the CEO and DEC within 48 hours of the fauna mortality being identified.	Acknowledgement of receipt of the report from the CEO and DEC within 48 hours.	CEO, DEC		Construction	Within 48 hours of mortality being identified.	NR	Proposal not yet implemented, not required at this stage.
892:M9.9	Trench Management	A euthanasia plan shall be prepared and approved by the DEC should the need arise to euthanize any injured fauna.	Development and approval of a Euthanasia Plan by the DEC.	Written approval from the DEC on the Euthanasia Plan.	DEC		Pre-construction	Prior to ground disturbing activities.	NR	Proposal not yet implemented, not required at this stage.
892:M10.1	Residual Impacts and Risk Management Measures	The proponent shall implement Project A, Project B and Project C set out in this condition to mitigate residual impacts to conservation significant fauna, eight priority flora, and potential indirect impacts to a Declared Rare Flora.	Implementation of Projects A, B and C.	Reporting in CAR.	Min for Env				NR	Proposal not yet implemented, not required at this stage.

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status	Further information
892:M10.2	Residual Impacts and Risk Management Measures	Project A – Within six months of the date of this statement, unless otherwise agreed by the CEO, the proponent shall constitute the Parker Range Conservation Trust (PRCT) with: a. a corporate trustee; b. a board of directors comprising a representative of the proponent and an independent biodiversity expert with knowledge of the Parker Range region; c. an advisory committee comprising environmental experts and representatives from interested stakeholder groups; d. an initial purpose to strategically acquire land for rehabilitation and conservation; e. a broad charter to study, conserve, manage and rehabilitate ecological communities in the Yilgarn Shire; and f. an obligation to report annually on its activities to the DEC and the CEO.	Cazaly to constitute the PRCT with: a. a corporate trustee; b. a board of directors comprising a representative of the proponent and an independent biodiversity expert with knowledge of the Parker Range region; c. an advisory committee comprising environmental experts and representatives from interested stakeholder groups; d. an initial purpose to strategically acquire land for rehabilitation and conservation; e. a broad charter to study, conserve, manage and rehabilitate ecological communities in the Yilgarn Shire; and f. an obligation to report annually on its activities to the DEC and the CEO.	Reporting in CAR.	CEO, DEC		Pre-construction or otherwise agreed to be CEO	Extension granted to 12 October 2013 (AS562098). Annual reporting on its activities to DEC and CEO.	NR	Variation to Condition granted by OEPA on 10 October 2013 to remove time constraints and comply with the Condition "prior to ground disturbing activities".
892:M10.3	Residual Impacts and Risk Management Measures	Project B – Within one year of the date of this statement, unless otherwise agreed by the CEO, the proponent shall contribute funds to the PRCT consistent with schedule 2 for the purpose of acquiring (in consultation with the DEC and the Department of Mines and Petroleum) at least 630 hectares of land for rehabilitation that will: a. provide habitat preferred by the Western Rosella and Malleefowl; b. be consistent with neighbouring native vegetation; and c. form habitat corridors between remnant native vegetation where appropriate.	Contribute funds to the PRCT consistent with Schedule 2 to acquire 630 ha of land.	Acknowledgement from the DMP and DEC of consultation. Details of land acquired to be reported in CAR.	CEO		Pre-construction or otherwise agreed to be CEO	Extension granted to 12 April 2014 (AS562098).	NR	Variation to Condition granted by OEPA on 10 October 2013 to remove time constraints and comply with the Condition "prior to ground disturbing activities".
892:M10.4	Residual Impacts and Risk Management Measures	If for any reason Project B is unsuccessful, the proponent will provide equivalent funds to the PRCT.	Correspondence with the OEPA.	Reporting in CAR.	Min for Env		Overall	As required.	NR	Proposal not yet implemented, not required at this stage.
892:M10.5	Residual Impacts and Risk Management Measures	Project C – The proponent shall contribute funds to the PRCT at intervals consistent with the funding schedule in schedule 2 for the purposes of undertaking rehabilitation work associated with Project B and/or for additional research, rehabilitation, management and conservation projects consistent with the charter of the PRCT.	Contribution of funds to the PRCT at intervals consistent with schedule in Schedule 2.	Details to be reported in CAR.	Min for Env		Overall	Ongoing - As outlined in Schedule 2.	NR	Proposal not yet implemented, not required at this stage.
892:M10.6	Residual Impacts and Risk Management Measures	The proponent shall fund Projects A, B and C in accordance with the financial commitments in schedule 2 adjusted by reference to the Perth consumer price index, with indexation against the 2011 base year.	Review of CPI and adjustment of fund structure	Details to be reported in the CAR	Min for Env		Overall	Ongoing - As outlined in Schedule 2.	NR	Proposal not yet implemented, not required at this stage.
892:M10.7	Residual Impacts and Risk Management Measures	Upon completion of the proposal, including mine closure, the proponent shall use its best endeavours to ensure that the PRCT transfers the land acquired in Project B, plus any remaining funds in the PRCT, to the DEC or an alternative organisation on approval of the CEO, and the PRCT will be terminated.	Consultation with the PRCT and in consultation with the DEC prepare a program for transfer of funds	Report endorsed by the DEC and included in the CAR	CEO, DEC		Decommissioning	Completion of proposal, including mine closure	NR	Proposal not yet implemented, not required at this stage.
892:M11.1	Air Quality	The proponent shall monitor dust emissions at the nearest sensitive receptors to the Liddell Road property (located at coordinates 698176E and 6533022N and identified in Figure 8) during implementation of the proposal against an ambient PM ₁₀ target of 50 micrograms per cubic metre averaged over a 24 hour period. Note: monitors should be sited in accordance with AS/NZS 3580.1.1:2007 or equivalent; and monitoring should be undertaken in accordance with AS/NZS 3580.9.6:2003, AS 3580.9.8-2008, AS/NZS 3580.9.11:2008, or equivalent.	Dust monitoring.	Results of monitoring presented in CAR.	Min for Env		Operation	During implementation of the proposal	NR	Proposal not yet implemented, not required at this stage.
892:M11.2	Air Quality	In the event that dust emission levels are in excess of the PM ₁₀ target defined by condition 11-1, the proponent shall notify the CEO within seven days of the exceedance.	Notify the CEO within 7 days of exceedance.	Acknowledgement of notification from the CEO within 7 days.	CEO		Operation	Within 7 days of exceedance	NR	Proposal not yet implemented, not required at this stage.
892:M11.3	Air Quality	The proponent shall within 14 days of the exceedance of the PM ₁₀ target defined by condition 11-1 being recorded, provide a report to the CEO outlining the causes for the exceedance and management measures being implemented to address the cause of the exceedance.	Submission of a report to the CEO within 14 days of an exceedance.	Acknowledgement of receipt of the report from the CEO within 14 days of exceedance.	CEO		Operation	Within 14 days of exceedance.	NR	Proposal not yet implemented, not required at this stage.
892:M11.4	Air Quality	The proponent shall maintain a complaints register for the duration of the proposal and investigate any dust complaints within 24 hours	Maintain a complaints register for the duration of the proposal.	Results to be presented in the CAR.	Min for Env		Operation	Ongoing during operations	NR	Proposal not yet implemented, not required at this stage.

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status	Further information
		and commence measures to address the cause of any dust complaints.	Investigation of any dust complaints within 24 hours							
892:M11.5	Air Quality	The proponent shall submit annual reports on the PM ₁₀ concentrations at the Liddell Road property to the CEO and the Chief Executive Officer of the DEC. The report shall: 1. detail the methodology and results of the testing; 2. compare the results of the testing with the expected levels described in the <i>Parker Range Project: Air Quality Impact Assessment</i> . Ecotech Pty Ltd, version P9 (Final), February 2011; 3. identify management actions to be undertaken should actual emissions be higher than PM ₁₀ target of 50 micrograms per cubic metre averaged over a 24 hour period; and 4. detail complaints received and measures taken to address the complaints.	Submission of annual reports to the CEO and DEC with dust monitoring results.	Acknowledgement of receipt of annual dust monitoring results or results presented in CAR.	CEO, DEC		Operation	Annually during operations.	NR	Proposal not yet implemented, not required at this stage.

3.0 STATEMENT OF COMPLIANCE

The Project is compliant with the conditions of MS 892. A 'Statement of Compliance' is attached as Appendix 1.

3.1 INTERNAL AUDITS

As the Project has not commenced, no internal audits have been undertaken at this stage.

3.2 EXTERNAL AUDITS

No external audits of the Project's compliance with MS 892 were undertaken during this reporting period.

4.0 NON-COMPLIANCES AND CORRECTIVE ACTIONS

4.1 NON-COMPLIANCES

There were no non-compliances during this reporting period.

4.2 CORRECTIVE ACTIONS

None required.

5.0 MONITORING RESULTS

As the project has not been implemented, no monitoring has been undertaken since the submission of the first CAR (2012 - 2013). The monitoring results completed at that time were included as attachments to the 2012 - 2013 CAR.

In accordance with Condition 7-2(2), DPaW has completed their assessment of the genetic processes in *Lepidosperma* sp. Parker Range and *Lepidosperma* sp. Mt Caudan to ensure the long term maintenance of genetic diversity in these species (Binks *et al.* 2013). This report was attached to the 2016 CAR.

6.0 COMPANY ENDORSEMENT BY MANAGING DIRECTOR OF CAZALY

The Joint Managing Director of Cazaly Iron Pty Ltd has endorsed this Compliance Assessment Report.

I HEREBY CERTIFY THAT TO THE BEST OF MY KNOWLEDGE, THE INFORMATION ABOVE ACCURATELY REFLECTS THE INFORMATION AND COMPLIANCE ASSESSMENT UNDERTAKEN FOR THE PARKER RANGE (MT CAUDAN) PROJECT.

Name: Clive Jones..... Position: Joint Managing Director.....

Signed:  Date: 2 July 2019.....

7.0 PUBLIC AVAILABILITY OF THE COMPLIANCE ASSESSMENT REPORT

This CAR will be made publicly available via the Cazaly website (www.cazalyresources.com.au) and will remain on the website for the life of the Project.

Cazaly will advise DWER of the internet link to the Report 14 days from the date of making the Report publicly available.

8.0 PROPOSED CHANGES TO THE COMPLIANCE ASSESSMENT PLAN

There are no proposed changes to the Compliance Assessment Plan.

9.0 BIBLIOGRAPHY

Binks, R., Millar, M. and M. Byrne (2013). *Final report for assessment of genetic processes in Lepidosperma sp. Parker Range and Lepidosperma sp. Mt Caudan. Science Division, Department of Parks and Wildlife*, July 2013. Report submitted to Botanica Consulting and Cazaly Iron Pty Ltd.

**APPENDIX 1 -
STATEMENT OF COMPLIANCE**

STATEMENT OF COMPLIANCE

1. Proposal and Proponent Details

Proposal Title	<i>Parker Range (Mount Caudan) Iron Ore Project</i>
Statement Number	<i>892</i>
Proponent Name	<i>Cazaly Iron Pty Ltd</i>
Proponent's Australian Company Number (where relevant)	<i>110 981 783</i>

2. Statement of Compliance Details

Reporting Period	<i>12/04/18 to 12/04/19</i>
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Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input checked="" type="checkbox"/>	Construction	<input type="checkbox"/>	Operation	<input type="checkbox"/>	Decommissioning	<input type="checkbox"/>

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	Section 2.0

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

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

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

Non-compliance/potential non-compliance 0-1

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

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

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

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

4. Proponent Declaration

I, [REDACTED], (full name and position title) declare that I am authorised on behalf of

[REDACTED]
(being the person responsible for the proposal) to submit this form and that the information contained in this form is true and not misleading.

Signature: [REDACTED] Date: [REDACTED]

Please note that:

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

5. Submission of Statement of Compliance

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

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

6. Contact Information

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

Manager, Compliance (Ministerial Statements)

Department of Water and Environmental Regulation

Postal Address: Locked Bag 33
Cloisters Square
PERTH WA 6850

Phone: (08) 6364 7000

Email: compliance@dwer.wa.gov.au

7. Post Assessment Guidelines and Forms

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

Each page (including Attachment 2) must be initialled by the person who signs Section 4 of this Statement of Compliance. INITIALS: [REDACTED]