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WESTERN AUSTRALIA

# Annual Compliance Report

**Karratha – Tom Price Road Stage 4  
EPBC Approval 2020/8725**

*We're working for  
Western Australia.*

**24 January 2025 to 23 January 2026  
Reporting Period**

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otherwise. Refer to iRoads for current version.

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# Document Control


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## 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: Douglas Morgan

Position: Executive Director Planning and Technical Services

Organisation: Main Roads Western Australia (ABN: 50 860 676 021)

Date: 23/04/2026

# 1 Introduction

## 1.1 Project Background, Location and Status

Main Roads Western Australia (Main Roads) has commenced construction of Karratha-Tom Price Road Stage 4 (KTP Stage 4), comprising 112 km of new road from the southern end of Stage 3 (Wallyinya Pool) to the Nanutarra Munjina Road (the Project). The Project was approved by the Commonwealth Minister for the Environment on 24 January 2023 (EPBC 2020/8725). Main Roads will deliver the Project in stages, with the first 10 km stage in accordance with this Approval (see Figure 1).

Construction of the Action commenced on 15 July 2025. Construction activities undertaken during the reporting period consisted of:

- Clearing of native vegetation (51.78 ha)
- Installing signage
- Construction preparatory works (Office installation etc).

## 1.2 Location of the Approved Action

The location of the approved action is in Figure 1.

## 1.3 Approval under the *Environment Protection and Biodiversity Conservation Act 1999*

The Project was referred to the Department of Climate Change, Energy, the Environment and Water (The Department) in July 2020 for assessment under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act). The Project was deemed to be a Controlled Action on 03 September 2020, due to its potential impacts on listed threatened species and communities. The Department granted conditional approval for the Project on 24 January 2023 (EPBC 2020/8725).

## 1.4 Purpose of this Report

This compliance report has been produced to satisfy Condition 25 of approval EPBC 2020/8725.

# 2 Summary of Compliance

Table 2 (Appendix A) of this report details the project's compliance regarding each approval condition over the 12-month reporting period: 24 January 2025 to 23 January 2026.

The Project was found to be fully compliant with the requirements of EPBC 2020/8725 Approval.

## 2.1 Subsidiary plans, operating strategy, and procedure

Conditions of this approval (EPBC 2020/8725) require the submission and implementation of a subsidiary management plan, water operating strategy, and procedures. The subsidiary management plan, operating strategy and reconciliation procedure are outlined in Table 1 below and referenced in Table 2 – EPBC Audit Table (Appendix A). Compliance with the subsidiary management plan, operating strategy, and procedure commitments are detailed in Audit Tables 3, 4, and 5 (Appendix B,C, and D).



**Table 1. Subsidiary plans to be implemented in accordance with EPBC 2020/8225 conditions.**

| EPBC Conditions          | Plan/Strategy/Procedure Commitments Implementation      | Audit Table         |
|--------------------------|---|---------------------|
| 5, 9, 10, 11, 13, and 24 | Fauna Action Management Plan (FAMP)                     | Appendix B. Table 3 |
| 7, 8, and 9              | Groundwater and Surfacewater Operating Strategy (GSWOS) | Appendix C. Table 4 |
| 15, 16, 17, and 18       | MRDH Impact Reconciliation Procedure                    | Appendix D. Table 5 |

## 2.2 Compliance Audit

DCCEEW notified Main Roads on 12 September 2025 that the Action was subject to a compliance audit. The audit was conducted between September to December 2025 and included a site visit on 23 October 2025 (during this reporting period). The Department closed out the audit on 15 December 2025, a summary of the audit findings are outlined below:

- Compliance with six of the twelve conditions examined.
- A non-compliance (Historical) with one condition of the Approval examined.
- Five conditions within the scope of the audit were not applicable at the time of the audit.

The historical non-compliance has been investigated and DCCEEW advised no further action is required.

## 2.3 New Environmental Risks

No new environmental risks for the project have become apparent during the reporting period.

### 3 APPENDICES

| Appendix   | Title   | Table   |
|------------|---|---------|
| Appendix A | Compliance with Conditions of EPBC Approval 2020/8725 – Audit Table   | Table 2 |
| Appendix B | Summary of Compliance with Proponent Environmental Management Commitments – Fauna Action Management Plan - Audit Table                    | Table 3 |
| Appendix C | Summary of Compliance with Proponent Environmental Management Commitments – Groundwater and Surfacewater Operating Strategy – Audit Table | Table 4 |
| Appendix D | Summary of Compliance with Proponent Environmental Management Commitments – Impact Reconciliation Procedure – Audit Table                 | Table 5 |

**Appendix A: Table 2. Compliance with Conditions of EPBC Approval 2020/8725 – Audit Table**

| Condition Number | Condition  | Status    | Evidence/Comments  |
|------------------|--|-----------|--|
| 1                | To avoid and mitigate impacts to protected matters, the approval holder must not clear and/or impact outside the development envelope.   | Compliant | All clearing areas are reviewed, pegged out by licenced surveyors, and boundaries are clearly demarcated. Pre and post clearing walk throughs are conducted to ensure that clearing activities do not occur outside the Development Envelope.  |
| 2                | <p>To avoid and mitigate impacts to listed terrestrial fauna, the approval holder must not clear and/or impact more than a combined total of 650 hectares of critical habitat and supporting habitat within the development envelope, which includes not clearing/impacting more than the following habitat types:</p> <p>a. 0.2 hectares of Mesas, Caves, Cliffs and Free faces habitat</p> <p>b. 3.8 hectares of Rocky Gullies habitat</p> <p>c. 88.7 hectares Rocky Hills and Slopes habitat</p> <p>d. 135.0 hectares Floodplains habitat</p> <p>e. 85.7 hectares Eucalyptus fringed Major Drainage Lines habitat</p> <p>f. 0.03 hectares Melaleuca Forest/Major Drainage Lines habitat</p> <p>g. 0.2 hectares Man-made water bodies habitat</p> <p>h. 69.7 hectares of Grove Mulga habitat</p> | Compliant | <p>Clearing and disturbance has occurred during the reporting period. The amount of hectares cleared during the reporting period are well within the specified limits of this condition and are outlined below:</p> <p>a) 0 ha of 0.2 ha of Mesas, Caves, Cliffs, and Free faces habitat .</p> <p>b) 0 ha of 3.8 ha of Rocky Gullies habitat.</p> <p>c) 0 ha of 88.7 ha Rocky Hills and Slopes habitat.</p> <p>d) 0 ha of 135.0 ha Floodplains habitat.</p> <p>e) 12.11 ha of 85.7 ha Eucalyptus fringed Major Drainage Lines habitat.</p> <p>f) 0 ha of 0.03 ha Melaleuca Forest/Major Drainage Lines habitat.</p> <p>g) 0 ha of 0.2 ha Man-made water bodies habitat.</p> <p>h) 0 ha of 69.7 ha of Grove Mulga habitat.</p> <p>i) 0 ha of 16.1 ha of Mulga Woodland Plain habitat.</p> |

| Condition Number | Condition   | Status         | Evidence/Comments  |
|------------------|---|----------------|--|
|                  | i. 16.1 hectares of Mulga Woodland Plain habitat<br>j. 10.4 hectares of Acacia xiphophylla shrublands over cracking clay habitat<br>k. 157.5 ha of Mixed Acacia shrublands habitat<br>l. 29.3 ha of Grassland plains with cracking clays habitat.   |                | j) 8.28 ha of 10.4 ha of Acacia xiphophylla shrublands over cracking clay habitat.<br>k) 28.99 ha of 157.5 ha of Mixed Acacia shrublands habitat.<br>l) 0 ha of 29.3 ha of Grassland plains with cracking clays habitat.   |
| 3                | To avoid and mitigate impacts to Ghost Bat, the approval holder must not clear or impact the viability of the Ghost Bat Caves within the development envelope.  | Compliant      | Construction commenced during the reporting period. The construction is not within a 200-metre buffer of the Ghost Bat Caves, and no road pull over areas have been constructed within 500-metres of the Ghost Bat Caves within the Development Envelope. No potential impacts to Ghost Bat Caves have been observed during the reporting period.<br><br>Refer to Table 2: Environmental Management Commitments – Fauna Action Management Plan – Audit Table.  |
| 4                | To avoid and mitigate impacts to the Fringed Fire-bush, the approval holder must:<br><br>a. not clear or impact the known individual of Fringed Fire-bush or any area within a 100-metre buffer around the known individual of Fringe Fire-bush;<br><br>b. undertake weed management measures and monitoring at a minimum of every 6 months to ensure that the known individual of Fringed Fire-bush and within a 100-metre buffer around the known individual of Fringe Fire-bush does not have weed infestation for the life of the approval. | Not applicable | It should be noted that in September 2025, the Fringed Fire-Bush was placed on the Deletion and Other Changes List (DOCL) with a proposed change: <i>deletion from the list</i> .<br><br>a) Clearing of the action commenced during the reporting period. Clearing activities are outside the 100m buffer of the known individual of Fringe Fire-bush.<br><br>b) No impact to the Fringed Fire-bush or the 100 metre buffer area around the known individual of Fringe Fire-bush has been observed from clearing activities. |

| Condition Number | Condition  | Status    | Evidence/Comments   |
|------------------|--|-----------|---|
|                  |  |           | <p>c) No weed management measures have been undertaken as clearing activities during the reporting period have not occurred within the nominated 100m buffer from the known Fringed Fire-bush. No weeds have been observed whilst clearing activities have been undertaken.</p>   |
| 5                | <p>To avoid and mitigate impacts to listed terrestrial fauna, the approval holder must submit the Fauna Action Management Plan for the Minister’s approval. The Fauna Action Management Plan must be consistent with EPBC Environmental Management Plan Guidelines. The Fauna Action Management Plan must be approved prior to the commencement of the action. If the Minister approves the Fauna Action Management Plan, then the approval holder must implement the approved Fauna Action Management Plan for the life of the approval. By implementing the Fauna Action Management Plan, the approval holder must achieve the following environmental objectives:</p> <p>a. Mitigate impacts to listed terrestrial fauna and the Fringe Fire-bush from feral animals by ensuring that the action does not increase or attract feral animals and undertake cane toad biosecurity measures to ensure that construction activity does not introduce cane toads into the development envelope.</p> <p>b. Mitigate inappropriate fire regime impacts to listed terrestrial fauna habitats.</p> <p>c. Ensure weed infestation does not impact on critical habitats and supporting habitats by exceeding the weed survey baselines extents presented in Karratha – Tom Price Road Stage 4 Preliminary Documentation and/or the establishment</p> | Compliant | <p>The Fauna Action Management Plan (FAMP) was approved by the Minister on 31 March 2023.</p> <p>a) Measures to mitigate impacts to terrestrial fauna and the Fringed Fire-bush from feral animals during construction include:</p> <ul style="list-style-type: none"> <li>i. Camp wastes being managed appropriately; <ul style="list-style-type: none"> <li>i. wastes are segregated.</li> <li>ii. waste bins having lids.</li> <li>iii. wastes removed weekly.</li> <li>iv. introduced fauna identified. around the construction offices and or camps is managed accordingly.</li> </ul> </li> <li>ii. There have been no reported sightings of cane toads within the Development Envelope during the reporting period. Biosecurity measures shall be implemented as they are required to prevent cane toads from entering the Development Envelope which include; <ul style="list-style-type: none"> <li>i. vehicles and or mobile plant that travel cross the states borders (NT/Qld/WA) will be checked by hygiene inspections prior to them gaining entry to the Development Envelope.</li> <li>ii. Any sitings of cane toads within the Development Envelope shall reported to HSE for appropriate action.</li> </ul> </li> </ul> <p>b) To mitigate listed terrestrial fauna from the impacts of fire from the construction of the action there is a number of fire mitigation measures utilised on site:</p> |

| Condition Number | Condition   | Status | Evidence/Comments  |
|------------------|---|--------|--|
|                  | <p>of new weed infestation within the development envelope by implementing the Weed Management measures.</p> <p>d. Maintain the viability of the Ghost Bat Caves by limiting human activity associated with the action within 200-metres of the Ghost Bat Caves and do not construct road pull over areas within 500-metres of the Ghost Bat Caves.</p> <p>e. Minimise impacts to Ghost Bat and Pilbara Leaf-nosed Bat through collision with barbed wire fences by not installing any barbed wire fences within the development envelope, excluding the lawful requirement where barbed wire is required by other legislation. All required barbed wire under these legislative requirements within the development envelope must have the top strand replaced with single strand wire and have bat deflectors installed to deter bat interaction.</p> <p>f. Minimise artificial lighting impacts to listed terrestrial fauna by ensuring no permanent lighting is established in the development envelope during operation other than required for safety reasons and other legislation. All required artificial lighting used during construction activity must use directional and/or shielded lighting, avoid direct light spill onto critical habitats and supporting habitats and within 500-metres of the Ghost Bat Caves.</p> <p>g. Establish speed limits to mitigate vehicle strike impacts to listed terrestrial fauna from construction activity by not exceeding 80 kilometres per hour (kph) during the daylight</p> |        | <ul style="list-style-type: none"> <li>iii. Monthly routine HSE inspections.</li> <li>iv. Signed off Hot Works Permits.</li> <li>v. Water truck will be in site during construction.</li> <li>vi. Fire extinguishers installed in areas of elevated risk.</li> <li>vii. Emergency response drills will include fire response scenarios.</li> </ul> <p>c) No weeds have been observed whilst clearing activities have been undertaken during the reporting period. Clearing activities were conducted outside the 100m buffer of the known Fringe Fire-bush.</p> <p>d) The viability of the Ghost Bat Caves has been maintained as clearing activities have not occurred within of 200m of the Ghost Bat Caves and no road pull over areas within 500-metres of the Ghost Bat Caves have been constructed.</p> <p>e) To minimise any impacts to Ghost Bat and Pilbara Leaf-nosed Bats Main Roads will ensure that no barbed wire fences shall be installed within the Development Envelope excluding the lawful requirement where barbed wire is required by other legislation. Main Roads shall also ensure that barbed wire required under legislative requirements within the Development Envelope shall have the top strand replaced with single strand wire and have bat deflectors installed to deter bat interaction. No fencing has been installed during the reporting period.</p> <p>f) Artificial lighting impacts to listed terrestrial fauna shall be minimised by directional and/or shielded lighting prevent direct light spill onto critical habitats and supporting habitats and within 500-metres of the</p> |

| Condition Number | Condition   | Status | Evidence/Comments  |
|------------------|---|--------|--|
|                  | <p>hours and limiting speeds to 60 kilometres per hour (kph) at night within the development envelope. During operation, establish comprehensible signage alerting drivers to the likelihood of encountering protected matters on both sides of all roads where any vehicles enter critical habitat for the protected matters.</p> <p>h. Minimise impacts from clearing, interaction with construction activity and entrapment on listed terrestrial fauna by:</p> <p>i. Undertaking clearing in a progressive manner to allow fauna to migrate away from clearing activities or machinery movements.</p> <p>ii. Not undertaking clearing within Mesas, Caves, Cliffs and Free faces habitat and Rocky Gullies habitat that is considered to be critical habitat for the Northern Quoll during the Northern Quoll breeding season.</p> <p>iii. Prior to the clearing of any Mesas, Caves, Cliffs and Free faces habitat and Rocky Gullies habitat that is considered to be critical habitat for the Northern Quoll, conduct a pre-clearance survey by a trained fauna spotter. If the Northern Quoll is found in the surveys, then clearing must not commence until the identified Northern Quoll moves out of the clearing area of its own accord.</p> <p>iv. Ensuring a trained fauna spotter is present during all clearing and who is authorised to halt or order the manner in which any clearing or other works are undertaken.</p> |        | <p>Ghost Bat Caves if it is required to be utilised. No artificial lighting has been installed or utilised during the reporting period.</p> <p>g) To minimise impacts to listed terrestrial fauna, speed limits are utilised across the Development Envelope as per Health and Safety management and site operational requirements. Designated speed limits will reduce vehicle strike impacts to listed terrestrial fauna from construction operations. Speed limit shall be limited to not exceeding 80 kilometres per hour.</p> <p>h) i. Clearing is undertaken as best as practicable in progressive manner to assist any fauna in moving away from clearing activities and or mobile plant.</p> <p>ii. No clearing has been undertaken during the reporting period within the Mesas, Caves, Cliffs and Free faces habitat and Rocky Gullies habitat that is considered to be critical habitat for the Northern Quoll during the Northern Quoll breeding season. A fauna spotter has been on site for clearing activities that have been undertaken outside the Mesas, Caves, Cliffs and Free faces habitat and Rocky Gullies habitat that is considered to be critical habitat for the Northern Quoll.</p> <p>iii. No clearing has been undertaken during the reporting period within the Mesas, Caves, Cliffs and Free faces habitat and Rocky Gullies habitat during the reporting period. A fauna spotter has been on site for clearing activities that have been undertaken outside the Mesas, Caves, Cliffs and Free faces habitat and Rocky Gullies habitat that is considered to be critical habitat for the Northern Quoll.</p> |

| Condition Number | Condition  | Status | Evidence/Comments   |
|------------------|--|--------|---|
|                  | <p>v. Should a listed terrestrial fauna be spotted during clearing activities, the works must cease until the listed terrestrial fauna moves out of the way of the clearing by its own accord or is removed by a trained fauna handler before recommencing clearing.</p> <p>vi. Survey all potential breeding trees for the Grey Falcon within the Eucalyptus fringed Major Drainage Lines habitat within the development envelope during nesting season June to November. If Grey Falcon nesting is found, then the tree must be avoided.</p> <p>i. Educate all personnel associated with the action and/or likely to enter the development envelope to undertake construction activity on the protected matters and the environmental obligations of this approval prior to them undertaking construction activity within the development envelope. This induction should include:</p> <ul style="list-style-type: none"> <li>i. the above speed restrictions and that the above speed restrictions are enforced; and</li> <li>ii. how to avoid deliberate killing of Pilbara Olive Python due to mis-identification.</li> </ul> |        | <p>iv. A trained fauna spotter was on site during clearing activities.</p> <p>v. Clearing activities shall be immediately stopped if any terrestrial fauna is encountered, and if required a trained fauna spotter maybe required to assist and or remove/relocate any fauna. Clearing activities shall only re-commence once the terrestrial fauna moves out of the area or is moved on.</p> <p>vi. Potential breeding trees for the Grey Falcon within the Eucalyptus fringed Major Drainage Lines habitat within the Development Envelope were surveyed during nesting season (June to November 2025) for nesting Grey Falcon/s. No suitable nesting trees and/or evidence of nesting was identified during the reporting period.</p> <p>i) i. The Contractors induction highlights site speed restrictions that all personnel are to adhere to within the Development Envelope. The speed limit signage is as per Health and Safety Management operational requirements.</p> <p>ii The contractors induction highlights the importance of protected matters and the requirement for their preservation and environmental requirements.<br/>Speed limits are identified across the site by speed limit signage. Site speed limit of 80 kilometres is not to be exceeded. Speeds limits are to be adhered to by all personnel on site; if exceedances are observed they are reported to the Health and Safety Department to manage accordingly.<br/>The site induction discusses how staff can avoid deliberate killing of Olive Pythons due to mis-identification.</p> |

| Condition Number | Condition  | Status         | Evidence/Comments   |
|------------------|--|----------------|---|
|                  |  |                | Refer to Table 3: Fauna Action Management Plan Management Commitments - Audit Table.  |
| 6                | <p>The approval holder must have approval of a Noise and Vibration Management Plan by the Minister prior to any blasting occurring within 500 metres of a Ghost Bat Caves. The Noise and Vibration Management Plan must be consistent with the EPBC Environmental Management Plan Guidelines. If the Minister approves the Noise and Vibration Management Plan, then the approval holder must implement the approved Noise and Vibration Management Plan for the life of the approval. By implementing the Noise and Vibration Management Plan, the approval holder must ensure that the following environmental objectives are met:</p> <p>a. Sound pressure levels are below 70 dB(Z) at the Ghost Bat Caves entrances.</p> <p>b. Blasting does not impact the viability of the Ghost Bat Caves.</p> | Not applicable | <p>This condition has not been triggered during the reporting period. An approved Noise and Vibration Management Plan by the Minister is not required at this time as no blasting has occurred within 500 metres of the Ghost Bat Caves during the reporting period.</p>  |
| 7                | <p>To avoid impacts to protected matters and their habitats as a result of changes to groundwater and surfacewater, the approval holder must have approval of a Groundwater and Surfacewater Operating Strategy from the Minister prior to the commencement of the groundwater abstraction activities. The Groundwater and Surfacewater Operating Strategy must be consistent with the EPBC Environmental Management Plan Guidelines.</p> <p>The approved Groundwater and Surfacewater Operating Strategy must be implemented for the life of the approval. By</p>   | Compliant      | <p>A Groundwater and Surfacewater Operating Strategy (GSWOS) was submitted to the Department for the Minister 's approval in January 2024 and approval was granted on 15 August 2025.</p> <p>a) No groundwater abstraction from any water bores within the Development Envelope has occurred during the reporting period. No surfacewater flows have been observed within the Development Envelope during the reporting period. No impacts have been observed to listed terrestrial fauna, the known individual of Fringed Fire-bush, and the critical habitats and</p> |

| Condition Number | Condition   | Status | Evidence/Comments   |
|------------------|---|--------|---|
|                  | <p>implementing the Groundwater and Surfacewater Operating Strategy, the approval holder must ensure the following environmental objectives are met:</p> <p>a. Ensure that changes to hydrology of groundwater and surfacewater flows and changes of water quality attributed to the action does not impact listed terrestrial fauna, the known individual of Fringed Fire-bush, and no more than the critical habitats and supporting habitats limits specified in Condition 2 of this approval within the development envelope.</p> <p>b. Abstract no more than a total of 0.4 gigalitres of water from groundwater bores within the development envelope for the life of the approval.</p> <p>c. Ensure no abstraction groundwater bores are established or used within a 500-metre radius of groundwater dependent ecosystems.</p> <p>d. Implement measures to limit impacts to groundwater levels and groundwater quality within the development envelope.</p> <p>e. Implement measures to install and construct the bridges, culverts, roadway embankments, and low-level floodways for construction and operation of the action that will:</p> <p>i. Maintain hydrological regimes for the watercourses and groundwater dependent ecosystems, which align with the predicted models outlined in the Karratha – Tom Price Road Stage 4 Preliminary Documentation.</p> |        | <p>supporting habitats limits specified in Condition 2 of this approval within the Development Envelope.</p> <p>b) No abstraction of groundwater has been undertaken from any bores located within the Development Envelope during the reporting period.</p> <p>c) No abstraction groundwater bores within the Development Envelope have been established or used within a 500 meter radius of groundwater dependent ecosystems.</p> <p>d) No impacts to groundwater levels and groundwater quality has been observed within the Development Envelope during the reporting period. No groundwater has been abstracted from any bores within the Development Envelope.<br/>No bridge or culvert construction has occurred during the reporting period.</p> <p>e) i. Hydrological regimes for the watercourses and groundwater dependent ecosystems have been maintained. No groundwater has been abstracted from any bores within the Development Envelope.</p> <p>ii. No surfacewater flows have been observed within the Development Envelope during the reporting period. No decline in surfacewater quality as a result of sedimentation, erosion and/or chemical pollutants from construction activities has been observed.</p> <p>Refer to Table 3 – Groundwater and Surfacewater Operating Strategy Management Commitments – Audit Table.</p> |

| Condition Number | Condition  | Status    | Evidence/Comments   |
|------------------|--|-----------|---|
|                  | <p>ii. Ensure there is no decline in surfacewater quality as a result of sedimentation, erosion and/or chemical pollutants attributed to the construction activity and operation of the action.</p>  |           |   |
| 8                | <p>To meet the requirements of the objectives listed in Condition 7 of this approval, the approval holder must develop the Groundwater and Surfacewater Operating Strategy to do the following:</p> <p>a. Develop a surfacewater monitoring program that undertakes baseline studies and then ongoing monitoring of the water quality both upstream and downstream for each of the watercourses that intersect with the development envelopment. The Groundwater and Surfacewater Operating Strategy will need to provide details of thresholds and triggers, and management actions to meet the objectives of Condition 7 of this approval.</p> <p>b. Develop a monitoring program to gather evidence that the bridges, culverts, roadway embankments, and low-level floodways of the watercourses that intersect with the development envelopment have been appropriately designed to not cause shadow effects, erosion, scour, and there is on-going roadway embankment stability. The Groundwater and Surfacewater Operating Strategy will need to have details of thresholds, triggers, and the management actions and/or remediation steps that will be put in place to meet the objectives of Condition 7 of this approval.</p> | Compliant | <p>The Groundwater and Surfacewater Operating Strategy (GSWOS) was submitted to the Department for the Minister 's approval in January 2024 and approval was granted on 15 August 2025.</p> <p>a) Surfacewater monitoring plan has been developed. No surfacewater flows have been observed within the Development Envelope during the reporting period.</p> <p>b) A monitoring program to prevent embankment instability (scouring and erosion) will be established and implemented as required when construction of bridges, culverts, roadway embankments commence.</p> <p>c) No groundwater abstraction has occurred within the Development Envelope during the reporting period.</p> <p>Refer to Table 4 - Groundwater and Surfacewater Operating Strategy Management Commitments – Audit Table.</p> |

| Condition Number | Condition   | Status         | Evidence/Comments  |
|------------------|---|----------------|--|
|                  | <p>c. Develop a groundwater monitoring program that captures groundwater levels, and the ongoing monitoring of groundwater levels and water quality during the abstraction of groundwater. The Groundwater and Surfacewater Operating Strategy will need to provide details of thresholds and triggers, and management actions to meet the objectives of Condition 7 of this approval. The groundwater levels will need to be provided to the Department every 6 months.</p>  |                |  |
| 9                | <p>In the event of any exceedance of a threshold criterion specified in the Fauna Action Management Plan, Noise and Vibration Management Plan and/or Groundwater and Surfacewater Operating Strategy, the approval holder must:</p> <p>a. Report the details of the location, nature, and magnitude of the exceedance in writing to the Department within five (5) business days of becoming aware of the exceedance.</p> <p>b. Within two (2) business days, commence implementing the applicable threshold exceedance contingency actions specified in the Plan(s).</p> <p>c. Undertake an investigation to determine the cause of the threshold criterion exceedance and the extent of impact(s) to protected matter(s) and habitats. Provide the outcomes of this investigation in a report to the Department within twenty (20) business days of the exceedance being reported as required by condition 9(a) of this approval.</p> <p>d. Within 6 months of any such exceedance event(s), have the relevant Fauna Action Management Plan, Noise and Vibration Management Plan, and/or Groundwater and Surfacewater</p> | Not applicable | This condition has not been triggered during the reporting period. |

| Condition Number | Condition  | Status | Evidence/Comments |
|------------------|--|--------|-------------------|
|                  | <p>Operating Strategy reviewed by an independent suitably qualified fauna expert and/or independent suitably qualified hydrologist and hydrogeologist to advise if one or all of the plan(s) will need to be revised and how to prevent the exceedance reoccurring.</p> <p>e. Within 10 months of detecting any exceedance of a threshold criterion related to protected matter(s), submit to the Department the advice of the report of the independent suitably qualified fauna expert and/or independent suitably qualified hydrologist and hydrogeologist and a version of the Fauna Action Management Plan, Noise and Vibration Management Plan and/or Groundwater and Surfacewater Operating Strategy revised to address the advice from the review to the Department for Minister approval.</p> <p>f. If the revised Fauna Action Management Plan, Noise and Vibration Management Plan, and/or Groundwater and Surfacewater Operating Strategy have not been provided to the Minister for approval within 18 months of detecting any exceedance of a threshold criterion or have not been suitability revised to meet the advice of independent suitably qualified fauna expert and/or independent suitably qualified hydrologist and hydrogeologist, the Minister may notify the approval holder that the plan(s) has/have not been submitted or is/are not suitable for approval. The Minister may, at least two months after so notifying the approval holder, approve a version of the plan(s) revised by the Department. The approval holder must implement the approved plan(s), for the remainder of the life of the approval or until a revised version</p> |        |                   |

| Condition Number | Condition   | Status         | Evidence/Comments  |
|------------------|---|----------------|--|
|                  | of plan(s) have been provided in accordance with Conditions 32-38 of this approval.   |                |  |
| 10               | <p>Within 6 months of detecting any exceedance of a threshold criterion related to protected matter(s), submit to the Department for the Minister’s approval, a Remediation Plan to address the impacts to protected matters identified in the report provided in Condition 9(c) of this approval. If approved, the Remediation Plan must be implemented for the life of the approval. The Remediation Plan must include:</p> <p>a. corrective action(s) to remediate impacts to protected matter(s) and their habitat, and;</p> <p>b. timeframes, completion criteria, and reporting schedules.</p>          | Not applicable | This condition has not been triggered during the reporting period. |
| 11               | <p>If the Minister informs the approval holder in writing that it is not possible to adequately remediate the impacts on protected matter(s) of one or more exceedance outlined in the Remediation Plan (as required to be submitted in Condition 10 of this approval), then the approval holder must, within 3 months of receiving such advice from the Minister, submit to the Department, an Exceedance Offset Management Plan (EOMP) addressing the exceedance(s) as specified by the Minister in writing for the Minister’s approval. The EOMP must meet the requirements specified in Attachment G.</p> | Not applicable | This condition has not been triggered during the reporting period. |
| 12               | <p>If the EOMP has not been approved by the Minister within 6 months of the Minister informing the approval holder in writing as described in condition 11 of this approval, and the Minister notifies the approval holder that the EOMP is not suitable for approval, the Minister may, at least two months</p>  | Not applicable | This condition has not been triggered during the reporting period. |

| Condition Number | Condition  | Status         | Evidence/Comments   |
|------------------|--|----------------|---|
|                  | after so notifying the approval holder, approve a version of the EOMP revised by the Department. The approval holder must implement the approved EOMP for the remainder of the life of this approval or a revised version of the EOMP is endorsed by the Minister.   |                |   |
| 13               | At least three months prior to each fifth anniversary of this approval decision, the approval holder must get the Fauna Action Management Plan and Groundwater and Surfacewater Operating Strategy reviewed by independent suitably qualified fauna expert and/or independent suitably qualified hydrologist and hydrogeologist (respectively) to advise if the triggers and thresholds are still effective and meet industry standards, whether further mitigation measures need to be applied, and whether the management actions have been implemented. In the event the independent suitably qualified fauna expert and/or independent suitably qualified hydrologist and hydrogeologist recommends revisions to one or more of these plan(s), the approval holder must revise that/those plan(s) in accordance with the recommendations of the independent suitably qualified fauna expert and/or independent suitably qualified hydrologist and hydrogeologist. Each revised plan(s) must be submitted to the Department for Minister approval within 6 months of the five-year anniversary of this approval decision. The approval holder must implement each approved revised plan(s). | Not applicable | This condition has not been triggered during the reporting period. Not required until 2028.   |
| 14               | To compensate for the residual significant impacts of clearing and/or impacts of critical habitat and supporting habitat for the Northern Quoll, Ghost Bat, Pilbara Leaf-nosed Bat and Pilbara Olive Python, the approval holder must make financial   | Compliant      | Main Roads contributed initial funds of \$193,038 (10% of the total contribution required to compensate residual impacts) on the 18 April 2023, into the Western Australian (WA) Department of Water and Environmental Regulation (DWER) Pilbara Environmental Offsets Fund (PEOF), which meets the requirements specified in this condition. |

| Condition Number | Condition  | Status    | Evidence/Comments   |
|------------------|--|-----------|---|
|                  | contributions to the Pilbara Environmental Offsets Fund (PEOF).  |           | Next scheduled payment is due in July 2027 (2 years after construction commences).  |
| 15               | <p>In contributing to the PEOF the approval holder must:</p> <p>a. Contribute funds toward an offset activity or activities that:</p> <ul style="list-style-type: none"> <li>i. reduces the rate of decline of the Northern Quoll, Ghost Bat, Pilbara Leaf-nosed Bat and Pilbara Olive Python;</li> <li>ii. ensures a viable population of Northern Quoll, Ghost Bat, Pilbara Leaf-nosed Bat and Pilbara Olive Python remain in the Pilbara region;</li> <li>iii. has specified outcomes and performance indicators; timeframes and milestones for their achievement;</li> <li>iv. includes sufficient monitoring to detect achievement of performance indicators, milestones, and the outcomes; and</li> <li>v. requires regular reporting to the approval holder of the outcomes of the offset activity or activities their funding has contributed towards.</li> </ul> <p>b. Implement the approved Karratha-Tom Price Stage 4 Impact Reconciliation Procedure. The Karratha-Tom Price Stage 4 Impact Reconciliation Procedure may be revised and approved by DWER at any time, but the approval holder must seek endorsement from the Minister prior to the approval of any revised Karratha-Tom Price Stage 4 Impact Reconciliation Procedure by DWER if the revisions relate to offset</p> | Compliant | <p>a) Main Roads has contributed initial funds into the DWER PEOF. Contributions of funds into the DWER PEOF meet the requirements specified in this condition.</p> <p>b) The Karratha-Tom Price Stage 4 Impact Reconciliation Procedure is being implemented. (Refer to Table 5: Impact Reconciliation Procedure Audit Table).</p> <p>c) If required and or directed, the approved Karratha-Tom Price Stage 4 Impact Reconciliation Procedure will be revised in accordance with this condition.</p> <p>d) Following the approval of the Impact Reconciliation Procedure (IRP) from the Minister, Main Roads made a payment of \$193,038 (10% of the total contribution required) into the Department of Water and Environmental Regulation (DWER) Pilbara Environmental Offsets Fund (PEOF) in April 2023. Evidence of the payment was previously provided to the Department in 2023-2024 Annual Compliance Report.</p> <p>e) Biennial payments to PEOF during the reporting period were not required.</p> <p>f) No payments were made into the DWER PEOF during the 2025 – 2026 reporting period.</p> <p>g) Details of progress towards, or achievement of the outcomes specified under condition 15(a) for the Northern Quoll, Ghost Bat,</p> |

| Condition Number | Condition   | Status | Evidence/Comments   |
|------------------|---|--------|---|
|                  | <p>requirements for the protected matters outlined in Condition 14 of this approval.</p> <p>c. The Karratha-Tom Price Stage 4 Impact Reconciliation Procedure must be revised in accordance with the 0.0 Impact Reconciliation Report Guidelines and include the financial contribution values described in Condition 15(e) of this approval for protected matters outlined in Condition 14 of this approval per hectare of critical habitat and supporting habitat cleared and/or impacted over the life of the approval.</p> <p>d. Following receipt of approval of the Karratha-Tom Price Stage 4 Impact Reconciliation Procedure by the Minister and prior to the commencement of the action, the approval holder must make a payment of 10 per cent of the total contribution that may be paid into the PEOF, which will contribute towards achieving the requirements of Condition 15(a) of this approval.</p> <p>e. Make biennial payments to the PEOF based on evidence of the actual clearing footprint. The first biennial reporting period shall commence from the commencement of the action. Biennial payments must be equivalent to or greater than the value of the following amounts, by adjustment in accordance with the CPI from the date of this approval decision until the date on which any payment is made, of:</p> <p style="padding-left: 40px;">i. A minimum of \$3,306 AUD (excluding GST) per hectare of critical habitat.</p> |        | <p>Pilbara Leaf-nosed Bat and Pilbara Olive Python can be found on the DWER PEOF website.</p> <p>Projects delivered through the Pilbara Environmental Offsets Fund   Western Australian Government (<a href="http://www.wa.gov.au">www.wa.gov.au</a>)</p> |

| Condition Number | Condition   | Status         | Evidence/Comments   |
|------------------|---|----------------|---|
|                  | <p>ii. A minimum of \$1,653 AUD (excluding GST) per hectare of supporting habitat.</p> <p>f. Submit evidence of each payment made to the Department within 10 business days of the date of making the payment.</p> <p>g. Include details of progress towards, or achievement of, the outcomes specified under condition 15(a) of this approval for the Northern Quoll, Ghost Bat, Pilbara Leaf-nosed Bat and Pilbara Olive Python in each compliance report submitted to the Department.</p>  |                |   |
| 16               | Write to the Minister, within 10 business days of being aware or having concerns, that the offset outcomes specified for the PEOF project(s) may not be achieved for the Northern Quoll, Ghost Bat, Pilbara Leaf-nosed Bat and Pilbara Olive Python.  | Not applicable | To date, no concerns have been raised regarding the achievement of the offset outcomes specified for the PEOF project(s) for the Northern Quoll, Ghost Bat, Pilbara Leaf-nosed Bat, and Pilbara Olive Python. |
| 17               | <p>Should the Minister determine that the PEOF is likely to fail for one or more protected matter(s), the Minister may write to the approval holder asking to provide evidence that failure has not occurred or is unlikely to occur and nominating a deadline by which this must be provided. If, after considering any information provided by the approval holder:</p> <p>a. The Minister determines that the PEOF has failed for one or all species named in Condition 14 of this approval, the approval holder must submit for the Minister’s approval, within 4 months of being notified by the Minister, an Offset Strategy consistent with the principles of the Environmental Offsets Policy to the satisfaction of the Minister.</p> <p>b. If the Offset Strategy has not been approved by the Minister in writing within 6 months of the notification by the</p> | Not applicable | <p>This condition has not been triggered during the reporting period.</p> <p>To date, the Minister has not determined that the PEOF is likely to fail.</p>  |

| Condition Number | Condition   | Status | Evidence/Comments |
|------------------|---|--------|-------------------|
|                  | <p>Minister under condition 17(a) of this approval, and the Minister notifies the approval holder that the provided Offset Strategy is not suitable for approval, the Minister may, at least 2 months after so notifying the approval holder, approve a version of the Offset Strategy revised by the Department. The approval holder must commence implementation of the approved Offset Strategy within 2 months of the approval of the Offset Strategy by the Minister in writing, or another time as agreed in writing by the Minister. The approval holder must implement the approved Offset Strategy for the life of the approval.</p> <p>c. The Offset Strategy to be provided for the Minister’s approval, if required by condition 17(a) of this approval, must provide a framework for how the residual significant impacts from the approved action on the Northern Quoll, Ghost Bat, Pilbara Leaf-nosed Bat and Pilbara Olive Python will be offset and must detail:</p> <ul style="list-style-type: none"> <li>i. how the strategy will achieve the outcomes required under Condition 15(a) of this approval;</li> <li>ii. how it accounts for relevant approved conservation advices, recovery plans, and threat abatement plans;</li> <li>iii. the party to be responsible for implementing the proposed offset(s);</li> <li>iv. the location and nature of the proposed offset(s);</li> <li>v. objectives, outcomes, and timeframes for their achievement;</li> <li>vi. budget;</li> </ul> |        |                   |

| Condition Number | Condition  | Status                | Evidence/Comments   |
|------------------|--|-----------------------|---|
|                  | <ul style="list-style-type: none"> <li>vii. performance and completion criteria for evaluating conservation outcomes;</li> <li>viii. project monitoring (with indicators and measures) capable of detecting progress towards and achievement of the required outcomes;</li> <li>ix. reporting of specified outputs/offset activities, progress towards and achievement of the required outcomes, and evaluation of appropriateness of measures implemented;</li> <li>x. a description of the potential risks to the successful implementation of each proposed offset (including but not limited to environmental, administrative, financial, and governance risks);</li> <li>xi. a description of the measures that will be implemented to mitigate risk associated with each proposed offset and a description of the contingency actions that will be implemented if performance or completion criteria are not met;</li> <li>xii. processes to adaptively manage the proposed offset;</li> <li>xiii. how the proposed offset is consistent with the Environmental Offsets Policy; and</li> <li>xiv. how the approval holder will ensure that the measures to be implemented as part of the Offsets Strategy have no detrimental impact on any protected matters under the EPBC Act.</li> </ul> |                       |   |
| 18               | The approval holder must notify the Department electronically of the date of commencement of the action, within 10 business days of commencement of the action.  | Compliant - Completed | Main Roads notified the Department on 28 July 2025 that construction of the Action had commenced. This notification was provided within the required timeframe. |
| 19               | If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder   | Compliant             | Main Roads notified the Department on 28 July 2025 that construction of the Action had commenced.   |

| Condition Number | Condition  | Status    | Evidence/Comments   |
|------------------|--|-----------|---|
|                  | must not commence the action without the prior written agreement of the Minister.  |           |   |
| 20               | The approval holder must maintain accurate and complete compliance records.  | Compliant | Main Roads maintains records are in accordance with this condition and their legal obligations under the <i>WA State Records Act 2000</i> .   |
| 21               | 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.  | Compliant | The Department requested electronic copies of compliance records in relation to a compliance audit that was conducted during the reporting period. Main Roads provided the requested information within the required timeframe. |
| 22               | The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018), or any subsequent official version or as otherwise specified by the Minister in writing.                | Compliant | Data required under the conditions of this approval will be prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018).   |
| 23               | The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Department's Guide to providing maps and boundary data for EPBC Act projects (2021), or any subsequent official version or as otherwise specified by the Minister in writing. | Compliant | Data required under the conditions of this approval will be prepared in accordance with the Department's Guide to providing maps and boundary data for EPBC Act projects (2021).  |
| 24               | The approval holder must submit all monitoring data (including sensitive ecological data), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the Department within 12 months of the approval and/or in accordance with the requirements of the Fauna Action  | Compliant | Monitoring data when required shall be submitted to the Department in accordance with this condition.   |

| Condition Number | Condition   | Status    | Evidence/Comments  |
|------------------|---|-----------|--|
|                  | Management Plan, Noise and Vibration Management Plan and Groundwater and Surfacewater Operating Strategy.   |           |  |
| 25               | The approval holder must prepare a compliance report for each 12-month period following the date of this approval, or as otherwise agreed to in writing by the Minister.  | Compliant | This Annual Compliance Report for the Approval (for the reporting period 25 January 2025 to 24 January 2026) meets the requirements of this condition.   |
| 26               | Each compliance report must be consistent with the Department’s Annual Compliance Report Guidelines (2014), or any subsequent official version.   | Compliant | This Annual Compliance Report has been prepared in accordance with the Department’s revised Annual Compliance Report Guidelines (2023).  |
| 27               | <p>Each compliance report must include:</p> <p>a. Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents.</p> <p>b. One or more shapefile showing all clearing of any protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.</p> <p>c. A schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.</p> | Compliant | <p>a) This Annual Compliance Report contains accurate and complete details of compliance with the conditions of this approval and associated management plans, strategies, and procedures.</p> <p>b) Clearing activities commenced on 15 July 2025. The relevant shape files are provided with this annual compliance report.</p> <p>c) A schedule of approved plans relevant to this approval is documented in section 2.1 and Table 1 of this annual compliance report. Implementation of approved management plan operating strategy and procedure is outlined in Audit Tables 3, 4, and 5 of this compliance report.</p> |
| 28               | <p>The approval holder must:</p> <p>a. Publish each compliance report on the website within 60 business days following the end of the 12-month period for which that compliance report is required.</p>   | Compliant | <p>a) This Annual Compliance Report will be published on the Main Roads website at the same time as the provision of this report to the Department within the nominated time frame.</p> <p>b) Main Roads shall notify the Department within 5 business days of the date of publication that the compliance report has been published on the website.</p>   |

| Condition Number | Condition  | Status         | Evidence/Comments   |
|------------------|--|----------------|---|
|                  | <p>b. Notify the Department electronically, within 5 business days of the date of publication that a compliance report has been published on the website.</p> <p>c. Provide the weblink for the compliance report in the notification to the department.</p> <p>d. Keep all published compliance reports required by these conditions on the website until the expiry date of this approval.</p> <p>e. Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public.</p> <p>f. If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the Department within 5 business days of its publication on the website and notify the Department in writing what exclusions and redactions have been made in the version published on the website.</p> |                | <p>c) Main Roads will provide the weblink for the compliance report in the notification to the Department.</p> <p>d) Main Roads will keep all published compliance reports required by EPBC 2020/8725 on the Main Roads website until the expiry of the approval.</p> <p>e) To date Main Roads has not excluded and or redact any sensitive ecological data from compliance reports and or associated documentation.</p> <p>f) Main Roads will advise the Department of any exclusions and or redactions of data are required in versions of published documentation on Main Roads website.</p> |
| 29               | <p>The approval holder must notify the Department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan.</p>   | Compliant      | No incidents or non-compliances occurred within the reporting period.   |
| 30               | <p>The approval holder must specify in the notification:</p> <p>a. Any condition or commitment made in a plan which has been or may have been breached.</p>  | Not applicable | No incidents or non-compliances occurred within the reporting period.   |

| Condition Number | Condition  | Status         | Evidence/Comments   |
|------------------|--|----------------|---|
|                  | <p>b. A short description of the incident and/or potential non-compliance and/or actual non-compliance.</p> <p>c. The location (including co-ordinates), date, and time of the incident and/or potential non-compliance and/or actual non-compliance.</p>  |                |   |
| 31               | <p>The approval holder must provide to the Department in writing, within 12 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance, the details of that incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan. The approval holder must specify:</p> <p>a. Any corrective action or investigation which the approval holder has already taken</p> <p>b. The potential impacts of the incident and/or non-compliance and/or non-compliance</p> <p>c. The method and timing of any corrective action that will be undertaken by the approval holder.</p> | Not applicable | No incidents or non-compliances occurred within the reporting period.   |
| 32               | <p>The approval holder may, at any time, apply to the Minister for a variation to any of the plan(s) 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 action management plan (RAMP) then, from the date specified, the approval holder must</p>  | Not applicable | Main Roads has not submitted any applications in accordance with the requirements of section 143A of the EPBC Act under Condition 32. |

| Condition Number | Condition   | Status         | Evidence/Comments   |
|------------------|---|----------------|---|
|                  | implement the RAMP in place of the previous action management plan.   |                |   |
| 33               | The approval holder may choose to revise an action management plan approved by the Minister under Conditions 5, 6, 7 and 8 of this approval or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.   | Not applicable | No action management plans required in accordance with Conditions 5, 6, 7 or 8 were revised during this reporting period. |
| 34               | The revised management plans must meet the environmental objectives of each of the plan(s) outlined in Conditions 5, 6, 7 and 8 of this approval.   | Not applicable | No action management plans required in accordance with Conditions 5, 6, 7 or 8 were revised during this reporting period. |
| 35               | <p>If the approval holder makes the choice under condition 33 of this approval to revise an action plan(s) without submitting it for approval, the approval holder must:</p> <p>a. notify the Department in writing that the approved action management plan has been revised and provide the Department with:</p> <ul style="list-style-type: none"> <li>i. an electronic copy of the RAMP;</li> <li>ii. an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP;</li> <li>iii. an explanation of the differences between the approved action management plan and the RAMP;</li> <li>iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact;</li> <li>v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being</li> </ul> | Not applicable | No action management plans required in accordance with Conditions 5, 6, 7 or 8 were revised during this reporting period. |

| Condition Number | Condition  | Status         | Evidence/Comments  |
|------------------|--|----------------|--|
|                  | <p>at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department.</p> <p>b. subject to condition 37 of this approval, implement the RAMP from the RAMP implementation date.</p>   |                |  |
| 36               | <p>The approval holder may revoke their choice to implement a RAMP under condition 33 of this approval at any time by giving written notice to the Department. If the approval holder revokes the choice under condition 33 of this approval, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 33 of this approval.</p>         | Not applicable | No action management plans required in accordance with Conditions 5, 6, 7 or 8 were revised during this reporting period.                  |
| 37               | <p>If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact, then:</p> <p>a. condition 33 does not apply, or ceases to apply, in relation to the RAMP</p> <p>b. the approval holder must implement the action management plan specified by the Minister in the notice.</p> | Not applicable | No action management plans required in accordance with Conditions 5, 6, 7 or 8 were revised during this reporting period.                  |
| 38               | <p>At the time of giving the notice under condition 37 of this approval, the Minister may also notify that for a specified period of time, condition 33 of this approval does not apply for one or more specified action management plans.</p>   | Not applicable | The Minister has not notified that Condition 33 of EPBC 2020/8725 does not apply for any specified action management plan.                 |
| 39               | <p>The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every three-year period following the commencement of the action</p>   | Not applicable | The Action commenced during the reporting period. The independent audit of compliance with the conditions of this approval is not required |

| Condition Number | Condition   | Status         | Evidence/Comments  |
|------------------|---|----------------|--|
|                  | until this approval expires, unless otherwise specified in writing by the Minister.   |                | until 15 July 2028.  |
| 40               | <p>For each independent audit, the approval holder must:</p> <p>a. Provide the name and qualifications of the nominated independent auditor, the draft audit criteria, and proposed timeframe for submitting the audit report to the Department prior to commencing the independent audit.</p> <p>b. Only commence the independent audit once the nominated independent auditor, audit criteria, and timeframe for submitting the audit report have been approved in writing by the Department.</p> <p>c. Submit the audit report to the Department for approval within the timeframe specified and approved in writing by the department.</p> <p>d. Publish each audit report on the website within 15 business days of the date of the department’s approval of the audit report.</p> <p>e. Keep every audit report published on the website until this approval expires.</p> | Not applicable | The Action commenced during the reporting period. The independent audit of compliance with the conditions of this approval is not required until 15 July 2028. |
| 41               | Each audit report must report for the three-year period preceding that audit report.  | Not applicable | The Action commenced during the reporting period. The independent audit of compliance with the conditions of this approval is not required until July 2028.    |
| 42               | Each audit report must be completed to the satisfaction of the Minister and be consistent with the Department’s Environment Protection and Biodiversity Conservation Act  | Not applicable | The Action commenced during the reporting period. The independent audit of compliance with the conditions of this approval is not required until July 2028.    |

| Condition Number | Condition   | Status         | Evidence/Comments   |
|------------------|---|----------------|---|
|                  | 1999 Independent Audit and Audit Report Guidelines (2019), or any subsequent official version.  |                |   |
| 43               | The approval holder must notify the Department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.   | Not applicable | The approval has effect until the 30 June 2030.                             |
| 44               | Within 20 business days after the completion of the action, and, in any event, before this approval expires, the approval holder must notify the Department electronically of the date of completion of the action and provide completion data. | Not applicable | The Action commenced during the reporting period and is under construction. |

**Appendix B: Table 3. Summary of Compliance with Proponent Environmental Management Commitments – Fauna Action Management Plan - Audit Table**

| Management Reference                                     | Commitment  | Requirement and Schedule  | Phase  | Compliance Status | Further Information  | Supporting Documentation |
|--|---|---|--|-------------------|--|--------------------------|
| <b>Environmental Audit Schedule</b><br>S9.1<br>Table 9-1 | Review of construction procedures to ensure FAMP management / monitoring actions are incorporated within works procedures.  | Prior to construction (single event).                           | Pre construction   | Compliant         | A review of construction procedures was completed prior to construction commencing.  |                          |
|  | Inspections by site environmental personnel to identify compliance with FAMP.   | Periodic (monthly).   | Construction   | Compliant         | HSE inspections have been undertaken.  |                          |
|  | Independent 'third-party' audit for assessment of compliance with FAMP.   | Annually (once per calendar year).                              |  | Not applicable    | Main Roads will engage auditors to conduct independent third party audits of the Fauna Action Management Plan of the previous twelve month period. Third party audits will commence in 2026 for the period 15 July 2025 to 14 July 2026. |                          |
|  | Independent 'third-party' audit for assessment of compliance with FAMP.   | Yearly until rehabilitated area successfully established.       | Post construction  | Not applicable    | This commitment has not been triggered during the reporting period.  |                          |
| <b>Management Review</b><br>S9.2<br>Table 9-2            | <ul style="list-style-type: none"> <li>Review of FAMP management and monitoring actions.</li> <li>Review of opportunities for an improvement in environmental performance.</li> <li>Address learnings from corrective actions.</li> <li>Revise FAMP (if appropriate) and seek approval of DCCEEW for revised FAMP.</li> </ul> | Annually (once per calendar year).                              | Pre-construction Construction  | Compliant         | The Fauna Action Management Plan is reviewed annually as part of the assessment of the proposals compliance against the approval conditions. No changes to the management plan were required.  |                          |
|  | <ul style="list-style-type: none"> <li>Review of FAMP by independent, suitably qualified fauna expert.</li> </ul> <p>Advise if FAMP requires further revision to prevent threshold criterion exceedance from reoccurrence.</p>  | Within six months of a threshold criteria exceedance occurring. | Construction   | Not applicable    | This commitment has not been triggered during the reporting period.  |                          |
|  | <ul style="list-style-type: none"> <li>Independent fauna expert review report of FAMP to be prepared and submitted to DCCEEW.</li> <li>Revised copy of FAMP (to address review report from independent fauna expert) to be prepared and submitted to DCCEEW.</li> </ul>   | In the event of any threshold criteria having been exceeded.    | Within ten months of any exceedance having been initially reported to DCCEEW | Not applicable    | This commitment has not been triggered during the reporting period.  |                          |

| Management Reference  | Commitment  | Requirement and Schedule  | Phase  | Compliance Status     | Further Information  | Supporting Documentation   |
|---|---|---|--|-----------------------|--|--|
|   | <p>Independent fauna expert review of FAMP to be prepared and submitted to DCCEE. Review should confirm:</p> <ul style="list-style-type: none"> <li>That triggers and thresholds are still effective and meet industry standards.</li> <li>If further management measures are required if management measures have been implemented.</li> </ul>   | Within three months of each fifth anniversary of the Project receiving the approval decision.   | Post construction  | Not applicable        | <p>This commitment has not been triggered during the reporting period.</p> <p>The Independent fauna expert review is not required until April 2030.</p>  |  |
| <p><b>Monitoring program</b></p> <p>S10.1</p> <p>Table 10-1</p> | <p><b>Construction – Flora</b></p> <p>Prevent the unauthorised clearing of the single Fringed Fire-bush plant identified during the Biota (2021) survey.</p>  | <ul style="list-style-type: none"> <li>Prior to and post-clearing site inspections.</li> <li>Monthly construction reports including clearing amounts.</li> </ul>  | Construction   | Not applicable        | <p>This commitment has not been triggered during the reporting period.</p> <p>No clearing activities have occurred within 100m of the single Fire-bush plant has occurred during the reporting period.</p>   |  |
|   | <p><b>Construction - Fauna Habitat</b></p> <p>Prevent unauthorised clearing of EPBC Act listed threatened fauna habitat including no more than:</p> <p>a) 0.2 ha of HS habitat<br/>                     b) 3.8 ha of RG habitat<br/>                     c) 88.7 ha of RHS habitat<br/>                     d) 135.0 ha of CP habitat<br/>                     e) 85.7 ha of MDE habitat<br/>                     f) 0.03 ha of MDM habitat<br/>                     g) 0.2 ha of MMW habitat<br/>                     h) 69.7 ha of MG habitat<br/>                     i) 16.1 ha of MWP habitat<br/>                     j) 10.4 ha of ASCC habitat<br/>                     k) 157.5 ha of ASM habitat<br/>                     l) 29.3 ha of GPCC habitat.</p> | <p>Pre-construction review of drawings and shape/CAD files showing approved areas.</p>  | Pre construction   | Compliant - Completed | Pre-construction review of construction drawings and clearing shapefiles was conducted to prevent any unauthorised clearing to occur.  |  |
|   |   | <ul style="list-style-type: none"> <li>Visual inspection of clearing areas prior to clearing commencing.</li> <li>Photographic record, GPS of non-conformance (incident reporting).</li> <li>Monthly site inspections.</li> </ul> | Construction   | Compliant             | Visual inspections of clearing areas are inclusive of pre-clearing fauna spotter surveys.  |  |
|   |   | <p>All areas to be cleared are to be clearly marked on site:</p> <ul style="list-style-type: none"> <li>Prior to commencement of clearing.</li> <li>Monthly site inspections and construction reports.</li> </ul>                 | Construction   | Compliant             | All clearing areas are pegged by a licenced Surveyor and demarcated prior to pre-clearing inspections and clearing activities commencing.  |  |
|   |   | <p>Monthly review of construction site plan.</p>  | Construction   | Compliant             | The construction site plan is reviewed within the fortnightly contract meeting. This meeting provides the provision of reviewing construction plans and site construction processes to ensure that delivery specifications of the Action are achieved. |  |
|   |   | <p>Prevent unauthorised impacts to groundwater levels and groundwater</p>   | <p>Audits against requirements of licences (26D Well construction,</p> | As per license        | Not applicable   | This condition has not been triggered during the reporting period. |

| Management Reference | Commitment  | Requirement and Schedule   | Phase                | Compliance Status     | Further Information  | Supporting Documentation |
|----------------------|---|--|----------------------|-----------------------|--|--------------------------|
|                      | quality.  | and 5C Taking of Water).   | requirements         |                       | A 26D Well construction licence is not applicable to this commitment, no wells have been constructed within the Development Envelope during the reporting period. No groundwater has been abstracted from any wells/bores within the Development Envelope during the reporting period.   |                          |
|                      |   | Monthly site inspections for compliance with water quality protection notes.   | Construction         | Not applicable        | This condition has not been triggered during the reporting period.<br><br>A 26D Well construction licence is not applicable to this commitment, no wells have been constructed within the Development Envelope during the reporting period. No groundwater has been abstracted from any wells/bores within the Development Envelope during the reporting period.   |                          |
|                      | Avoid indirect impacts to groundwater dependent vegetation.<br><br>GSWOS prepared and approved by the Minister for the Environment.   | Prior to commencement of proposed action.  | Pre construction     | Compliant - Completed | The Groundwater and Surfacewater Operating Strategy (GSWOS) was submitted to the Department for Minister approval on January 12, 2024, and approved on 15 August 2025.   |                          |
|                      | No introduction or spread of declared weeds, WONS or serious environmental weed species into surrounding native vegetation adjacent to the <b>development envelope</b> during and attributable to construction. | <ul style="list-style-type: none"> <li>Monthly visual inspections.</li> <li>-Weed monitoring to be undertaken along the edge of the road reserve annually</li> </ul>                       | Construction         | Compliant             | During clearing activities being undertaken outside the 100m buffer of the Fire-Bush area. There has been no introduction of or spread of declared weeds, WONS, or serious environmental weed species into surrounding native vegetation adjacent to the Development Envelope from construction activities. No weeds have been observed whilst clearing activities have been undertaken during the reporting period.   |                          |
|                      |   | Monthly visual inspections for 3 years.  | Post construction    | Not applicable        | This commitment has not been triggered during the reporting period.  |                          |
|                      | No introduction of the cane toad ( <i>Rhinella marina</i> ) into the development envelope.  | Periodic visual inspections of vehicle/machine/item of plant body and any associated load (i.e. pallets): <ul style="list-style-type: none"> <li>Periodic visual inspections.</li> </ul>   | Overall - all stages | Compliant             | Biosecurity shall be implemented as it is required to prevent cane toads from entering the development envelope; <ul style="list-style-type: none"> <li>Vehicles and or mobile plant that travel cross the states borders (NT/Qld/WA) would be checked by hygiene inspections prior to them gaining site entry to the Action.</li> <li>Any sightings of cane toads will be reported to HSE for appropriate action.</li> </ul> No sightings of cane toads have been observed during the reporting period within the Development Envelope. |                          |
|                      | No instances of fires impacting on listed species habitat attributable to the Proposed Action during construction.  | Review of written permits (i.e. hot works): <ul style="list-style-type: none"> <li>Monthly routine visual inspections (i.e. reviewing separation distances from key fire risks.</li> </ul> | Construction         | Compliant             | To mitigate the potential of fires impacting on listed species habitat within the Development Envelope, completed Hot Works permits are reviewed and approved by the contractors Health and Safety Department. Other potential site fire risks are identified by numerous methods including; pre-starts, Take 5, and routine HSE inspections. No fires have been observed during the reporting period.   |                          |
|                      | <b>Construction – All EPBC Act listed</b>   | A list of local wildlife rescue organisations and carers is on   | Overall - all stages | Compliant             | The contractor has a list of contact details of wildlife rescue organisations and careers where listed threatened species can be   |                          |

| Management Reference | Commitment  | Requirement and Schedule  | Phase            | Compliance Status     | Further Information  | Supporting Documentation |
|----------------------|---|---|------------------|-----------------------|--|--------------------------|
|                      | <p><b>threatened species</b></p> <p>Avoid injury or mortality to EPBC Act listed threatened species during construction of the Proposed Action.</p> | <p>site at all times:</p> <ul style="list-style-type: none"> <li>Visual inspections.</li> </ul>   |                  |                       | taken for care.  |                          |
|                      |   | <p>All fauna fatalities that occur as a result of the construction of the Proposed Action will be recorded as an environmental incident through Main Roads EQSafe system:</p> <ul style="list-style-type: none"> <li>Routine opportunistic visual inspections.</li> </ul> |                  | Compliant             | There has been no fauna fatalities as a result of construction activities conducted during the reporting period.   |                          |
|                      |   | <p>No incidents of speeding within the construction site boundary:</p> <ul style="list-style-type: none"> <li>Visual monitoring by all construction personnel.</li> </ul>   | Construction     | Compliant             | No incidents of speeding on site have been recorded during the reporting period.   |                          |
|                      |   | <p>Induction material includes required information:</p> <ul style="list-style-type: none"> <li>Review of induction material.</li> <li>Inspection of induction records.</li> </ul>  | Construction     | Compliant             | <p>The contractors site induction has been reviewed to ensure that environmental content has been included.</p> <p>The Contractors Safety Department manages all induction records which are maintained in their Health and Safety Management System.</p>  |                          |
|                      |   | <p>Construction camp waste including food waste will not be dumped. Waste will be appropriately segregated and contained, including use of lids that cannot be removed by fauna:</p> <ul style="list-style-type: none"> <li>Monthly visual inspection.</li> </ul>         | Construction     | Compliant             | <ul style="list-style-type: none"> <li>Site construction wastes are managed appropriately:                             <ul style="list-style-type: none"> <li>Wastes are segregated.</li> <li>Waste bins have lids to prevent fauna from accessing organic wastes and also minimise windblown wastes.</li> <li>Wastes are regularly removed off site and disposed of, off to a licenced facility.</li> <li>Routine HSE inspections are conducted.</li> </ul> </li> </ul> |                          |
|                      |   | <p>No increase in introduced fauna, attributable to construction activities:</p> <ul style="list-style-type: none"> <li>Monthly visual inspections.</li> </ul>  | Construction     | Compliant             | HSE inspections have not identified introduced fauna from construction activities within the Development Envelope during the reporting period.   |                          |
|                      |   | <p>GSWOS prepared and approved by the Minister for the Environment.</p> <ul style="list-style-type: none"> <li>Record of Minister for the Environment approval of GSWOS.</li> </ul>   | Pre construction | Compliant - Completed | A Groundwater and Surfacewater Operating Strategy (GSWOS) was submitted to the Department for Minister approval on January 12, 2024, and approved on 15 August 2025.   |                          |

| Management Reference | Commitment   | Requirement and Schedule   | Phase        | Compliance Status | Further Information  | Supporting Documentation |
|----------------------|--|--|--------------|-------------------|--|--------------------------|
|                      |  | <p>No clearing of vegetation occurs without a trained fauna spotter in attendance.</p> <p>Prior to commencement of vegetation clearing:</p> <ul style="list-style-type: none"> <li>Project clearing permit, signed by Supervisor and fauna spotter.</li> <li>Visual inspection.</li> <li>Review of written records.</li> </ul>   | Construction | Compliant         | <p>All clearing of native vegetation involves specialised fauna spotters with specific fauna experience being present on site during all clearing activities.</p> <p>As part of daily activities on site the fauna spotters conducted pre and post clearing inspections to identify if any potential animals are present or if there are any injured animals and also assist guiding any fauna out of the designated clearing areas.</p> <p>Clearing permit is reviewed and signed off by the site supervisor prior to clearing activities commencing.</p> |                          |
|                      |  | <p>Clearing ceases when listed fauna are found within clearing area:</p> <ul style="list-style-type: none"> <li>Visual inspection.</li> <li>Fauna interaction records.</li> </ul>  | Construction | Compliant         | <p>Fauna spotters will when required stop clearing activities should any listed fauna be encountered whilst vegetation clearing is being undertaken. This minimises the risk to listed fauna being injured.</p> <p>No threatened species have been observed or reported showing any signs of injury during the reporting period.</p>   |                          |
|                      | <p><b>Construction - Northern Quoll management measures</b></p> <p>Avoid injury or mortality to EPBC Act listed threatened species during construction of the Proposed Action.</p> | <p>No clearing of habitat (i.e. mesas, caves, cliffs, and free faces) critical to the survival of the Northern Quoll occurs between 1 April and 30 September:</p> <ul style="list-style-type: none"> <li>Monthly visual site inspections.</li> <li>Review of written records.</li> </ul>   | Construction | Compliant         | <p>No clearing of habitat (i.e. mesas, caves, cliffs, and free faces) critical to the survival of the Northern Quoll has been undertaken between 1 April and 30 September during the reporting period. No impact to listed threatened species has been observed.</p>   |                          |
|                      |  | <p>No clearing to be undertaken in critical habitat (i.e. mesas, caves, cliffs, and free faces) until surveys by trained fauna spotters confirm species is not present in the area to be cleared:</p> <ul style="list-style-type: none"> <li>Two weeks prior to clearing commencing.</li> <li>Visual inspection.</li> <li>Records of pre-clearance surveys.</li> </ul> | Construction | Compliant         | <p>No clearing has been undertaken in critical habitat (i.e. mesas, caves, cliffs, and free faces) of listed threatened species. No impact to listed threatened species has been observed during the reporting period.</p>   |                          |
|                      |  | <p>Induction material contains required information:</p> <ul style="list-style-type: none"> <li>Monthly review of contractor</li> </ul>  | Construction | Compliant         | <p>The contractors site induction has been reviewed for environmental content.</p> <p>The contractors Health and Safety Department manages all</p>   |                          |

| Management Reference | Commitment  | Requirement and Schedule   | Phase                | Compliance Status | Further Information  | Supporting Documentation |
|----------------------|---|--|----------------------|-------------------|--|--------------------------|
|                      |   | induction material and written records.  |                      |                   | induction records which are maintained in their Health and Safety Management System.   |                          |
|                      | <b>Construction - Pilbara Leaf-nosed Bat and Ghost Bat management measures</b><br><br>Avoid injury or mortality to EPBC Act listed threatened species during construction of the Proposed Action. | Induction material contains required information:<br><br><ul style="list-style-type: none"> <li>Monthly review of contractor induction material and records.</li> </ul>  | Construction         | Compliant         | The contractors site induction has been reviewed for environmental information and obligations required to be met.<br><br>The Contractors Safety Department manages all induction records which are maintained in their Health and Safety Management System. |                          |
|                      | Avoid impacts to roosting caves utilised by Ghost Bats.   | Drawings including no-go zones provided to Construction Contractor Representative:<br><br><ul style="list-style-type: none"> <li>Record of provision of drawings showing no-go zones.</li> <li>Pre-construction review.</li> </ul> | Pre construction     | Compliant         | Impacts to roosting caves utilised by Ghost Bats are mitigated by exclusion areas and or no-go zones identified on construction drawings prior to construction.  |                          |
|                      |   | Top strand of fencing has single strand wire and bat deflectors installed:<br><br><ul style="list-style-type: none"> <li>Monthly visual site inspections.</li> <li>Review fencing design drawings.</li> </ul>                      | Overall – all stages | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No fencing of the Action has commenced during the reporting period.   |                          |
|                      |   | All no-go zones clearly marked out on site prior to clearing commencing:<br><br><ul style="list-style-type: none"> <li>Incident reporting (EQSafe).</li> <li>Monthly site inspections.</li> </ul>                                  | Construction         | Compliant         | Any exclusion areas and or no-go zones are clearly demarcated prior to clearing activities commencing.<br><br>All clearing conducted during the reporting period is within the nominated clearing hectares.  |                          |
|                      |   | All no-go zones clearly marked out onsite, where night works are occurring:<br><br><ul style="list-style-type: none"> <li>Monthly visual site inspections.</li> </ul>  | Construction         | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No night works have been undertaken during the reporting period.  |                          |
|                      |   | Noise and Vibration Management Plan approved by DCCEEW:<br><br><ul style="list-style-type: none"> <li>Record of DCCEEW approval of Noise and Vibration Management</li> </ul>   | Construction         | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>An approved Noise and Vibration Management Plan by the minister is not required during this reporting period. No blasting has occurred during the reporting period.               |                          |

| Management Reference | Commitment   | Requirement and Schedule  | Phase        | Compliance Status | Further Information  | Supporting Documentation |
|----------------------|--|---|--------------|-------------------|--|--------------------------|
|                      |  | Plan.<br><i>(Prior to blasting occurring within 400 m of a cave with evidence of Ghost Bat usage)</i>   |              |                   |  |                          |
|                      |  | PPV as measured during blasting at caves with evidence of Ghost Bat usage exceeds threshold level. Following consultation with a fauna specialist a threshold for the predicted PPV will be agreed between Main Roads and DCCEEW to ensure no impact to any cave being used by Ghost Bats:<br><br><ul style="list-style-type: none"> <li>Monitoring of PPV during blasting at caves with evidence of Ghost Bat usage.</li> </ul> <i>(Every blast within 400 m of a cave with evidence of Ghost Bat usage)</i> | Construction | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No blasting has occurred within the Development Envelope during the reporting period.<br><br>No impacts to roosting caves utilised by Ghost Bats has been observed during the reporting period. |                          |
|                      |  | All identified Ghost Bat roosts recorded in database and mapped on all construction plans.<br>Database is accessible to all site personnel.<br><br><ul style="list-style-type: none"> <li>Monthly site inspections.</li> </ul>  | Construction | Compliant         | Ghost Bat roosts' locations have been identified and recorded. This record is managed by site HSE Department and available for all site personnel.   |                          |
|                      |  | Contractor method statement includes confined blasting technique:<br><br><ul style="list-style-type: none"> <li>Review of contractor method statement.</li> <li>Monthly inspection.</li> </ul>  | Construction | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No blasting has occurred within the Development Envelope during the reporting period.<br><br>No impacts to roosting caves utilised by Ghost Bats has been observed during the reporting period. |                          |
|                      | <b>Construction – Grey Falcon management measures</b><br><br>Avoid impacts to breeding trees used by Grey Falcon | Grey Falcon breeding trees: surveys completed;<br><br><ul style="list-style-type: none"> <li>Visual inspection of breeding trees.</li> <li>Record of survey report.</li> </ul>  | Construction | Compliant         | The contractor has engaged specialised fauna professionals to undertake fauna surveys for breeding trees of Grey Falcons.  |                          |
|                      |  | No clearing of Grey Falcon breeding trees that have active  | Construction | Compliant         | Fauna survey for Grey Falcon breeding trees conducted in the Development Envelope during the reporting period has not  |                          |

| Management Reference                          | Commitment  | Requirement and Schedule   | Phase                             | Compliance Status | Further Information  | Supporting Documentation |
|---|---|--|-----------------------------------|-------------------|--|--------------------------|
|   |   | nests present: <ul style="list-style-type: none"> <li>Visual inspection of breeding trees.</li> </ul>  |                                   |                   | identified any breeding trees for Grey Falcons.  |                          |
|   | <b>Operations – All EPBC Act listed threatened species</b><br><br>Minimise injury or mortality to EPBC listed threatened species during operation.  | Design documents include fauna friendly signage: <ul style="list-style-type: none"> <li>Pre-construction design reviews and visual inspections.</li> </ul>                       | Pre construction and construction | Not applicable    | Project relates to the construction of 118 kilometres highway. Construction of first ten kilometres is being built during this reporting period. Core habitat for MNES fauna occurs in sections further south.<br><br>No fauna friendly signage to be installed within first ten kilometres for project. |                          |
|   |   | Design documents include fauna friendly signage: <ul style="list-style-type: none"> <li>Post-construction as built reviews against the design and visual inspections.</li> </ul> | Post construction                 | Not applicable    | This commitment has not been triggered during the reporting period.  |                          |
| <b>Reporting</b><br><br>S11<br><br>Table 11-1 | Implementation of FAMP.   | Report annually to DCCEEW (as part of annual compliance reporting).  | Overall – all stages              | Compliant         | The ACR is written evidence that the Fauna Action Management Plan is being implemented.  |                          |
|   | Notification of exceedance of any threshold criteria.   | Report to DCCEEW within five business days of becoming aware of an exceedance.   | Overall – all stages              | Not applicable    | This commitment has not been triggered during the reporting period.  |                          |
|   | Environmental incident investigation report.  | Within 20 business days of an exceedance having been initially reported to DCCEEW.   | Overall – all stages              | Not applicable    | This commitment has not been triggered during the reporting period.  |                          |
|   | Remediation Plan<br>(in event of any threshold criteria having been exceeded), including detail on: <ul style="list-style-type: none"> <li>corrective actions to address any impacts to listed fauna and their habits.</li> <li>timeframes, completion criteria and reporting schedules.</li> </ul> | Within six months of any exceedance having been initially reported to DCCEEW.  | Overall – all stages              | Not applicable    | This commitment has not been triggered during the reporting period.  |                          |
|   | Exceedance Offset Management Plan (in the event that the Remediation Plan identifies impacts on protected matters are unable to be adequately remediated).  | Within three months of receiving notification from the Minister.   | Overall – all stages              | Not applicable    | This commitment has not been triggered during the reporting period.  |                          |
|   | Monitoring data, including ecological data, surveys, maps, metadata, species occurrence records data (sightings and evidence of presence).  | Report to DCCEEW within 12 months of the approval of the FAMP.   | Overall – all stages              | Not applicable    | The FAMP was approved on 31 March 2023, with the Action commencing on 15 July 2025. No monitoring data nor occurrence records were recorded during the reporting period. Going forward, the annual compliance report will be used to report such   |                          |

| Management Reference                 | Commitment   | Requirement and Schedule   | Phase                | Compliance Status | Further Information   | Supporting Documentation |
|--------------------------------------|--|--|----------------------|-------------------|---|--------------------------|
|                                      |  |  |                      |                   | records.  |                          |
| <b>Environmental Training</b><br>S13 | Main Roads will ensure that all individuals employed in the construction of the Karratha – Tom Price Stage 4 road have the appropriate training and experience required to successfully implement this FAMP. | All personnel will receive environmental awareness training, applicable to their roles and responsibilities.<br><br>Environmental training content as per s13 pg. 71 of the approved FAMP. | Overall – all stages | Compliant         | Environmental awareness and obligations are included in the site induction. All personnel that work on site must complete the site induction prior to commencing work.<br><br>The HSE Department maintains the document Management System where induction records are maintained. |                          |

**Appendix C: Table 4. Summary of Compliance with Proponent Environmental Management Commitments – Groundwater and Surfacewater Operating Strategy – Audit Table**

| Audit Code   | Commitment  | Requirement and Schedule   | Phase   | Compliance Status | Further Information  | Supporting Documentation  |
|--|---|--|---|-------------------|--|---|
| <b>Environmental Monitoring</b><br>S7.1<br>Table 7-1 | Avoid impacts to protected matters and their habitats as a result of changes to groundwater and surfacewater<br><br>• The combined groundwater abstraction volume from all bores <b>within the Development Envelope</b> is ≤0.4 gigalitres over the life of the approval. | Records of groundwater abstraction locations and volumes:<br><br>• Flow rates will be measured during water abstraction to enable calculation of abstracted water volumes.<br><br>• During groundwater abstraction activities. | Overall – all stages  | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No groundwater abstraction from any bores has been undertaken within the Development Envelope during the reporting period.<br><br>No impacts to protected matters and their habitats has been observed during the reporting period. |   |
|  |   | • Ensure no abstraction groundwater bores are established or used <b>within the Development Envelope</b> for the purpose of construction water abstraction within a 500-metre radius of groundwater dependent ecosystems.      | Record of drawings which show 'no abstraction' zones:<br><br>• Pre-construction review of drawings, once. | Pre construction  | Not applicable   | This commitment has not been triggered during the reporting period.<br><br>No groundwater abstraction has been undertaken from any bores within the Development Envelope within or within a 500-metre radius of groundwater dependent ecosystems during the reporting period. |
|  |   | Site inspections of groundwater abstraction activities:<br><br>• Visual site inspections.  | Overall – all stages  | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No groundwater abstraction has been undertaken within the Development Envelope or within a 500-metre radius of groundwater dependent ecosystems during the reporting period.  |   |
|  |   | Records of groundwater abstraction activities:<br><br>• Review of records during groundwater activities.   | Overall – all stages  | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No groundwater abstraction has been undertaken within the Development Envelope or within a 500-metre radius of groundwater dependent ecosystems during the reporting period.  |   |
|  | Groundwater quality monitoring shows that there is no decline in groundwater quality that may result in impacts to protected matters attributable to the project.   | Site inspections:<br><br>• Monthly visual site inspections.  | Construction  | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No groundwater abstraction has been undertaken within the Development Envelope or within a 500-metre radius of groundwater dependent ecosystems during the reporting period.  |   |
|  |   | Groundwater quality monitoring during construction (as per S7.4 GW&SWOP):<br><br>• Two monthly during groundwater abstraction activities.  | Construction  | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No groundwater abstraction has been undertaken within the Development Envelope or within a 500-metre radius of groundwater dependent ecosystems during the reporting period.  |   |

| Audit Code  | Commitment  | Requirement and Schedule   | Phase             | Compliance Status | Further Information  | Supporting Documentation |
|---|---|--|-------------------|-------------------|--|--------------------------|
|   | Measured groundwater drawdown levels are consistent with predictions.   | Monitoring of groundwater level ((m BGL) (as per S7.4 GW&SWOP) <ul style="list-style-type: none"> <li>Two monthly during groundwater abstraction activities.</li> </ul>  | Construction      | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No groundwater abstraction has been undertaken within the Development Envelope or within a 500-metre radius of groundwater dependent ecosystems during the reporting period.          |                          |
|   | Review of road design indicates that post construction surfacewater flows are maintained.   | Pre-construction review of road formation design: <ul style="list-style-type: none"> <li>Design review once – pre construction.</li> </ul>   | Pre construction  | Compliant         | Pre-construction review of road design was conducted.  |                          |
|   | Visual inspection confirms that the road construction is not causing shadow effects, erosion or scour, and there is on-going roadway embankment stability.  | Post construction visual inspection: <ul style="list-style-type: none"> <li>Visual inspection once post construction as part of ongoing maintenance activities after significant rainfall event.</li> </ul>  | Post construction | Not applicable    | This commitment has not been triggered during the reporting period.  |                          |
|   | Surfacewater monitoring shows that there is no decline in surfacewater quality that may result in impacts to protected matters attributable to the project.   | Visual inspection of works area and adjacent watercourse, as part of site inspection: <ul style="list-style-type: none"> <li>Monthly visual inspection during construction activities (only after heavy rains).</li> </ul>   | Construction      | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No surfacewater flows have been observed within the Development Envelope during the reporting period. No impact to protected matters has been observed.                               |                          |
|   |   | Surfacewater quality monitoring during construction: <ul style="list-style-type: none"> <li>Monthly during construction activities (only after heavy rains).</li> </ul>  | Construction      | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No surfacewater flows have been observed within the Development Envelope during the reporting period. No impact to protected matters has been observed.                               |                          |
| <b>Surface Water Monitoring</b><br>S7.2               | Monitoring of surfacewater quality will be undertaken during construction activities<br><br><i>Given the low number of heavy rainfall days that are experienced in the Pilbara region, it is expected that <b>surfacewater flowing through the Development Envelope</b> will only occur for short periods (i.e. up to several days) . Accordingly, there will be limited opportunities to undertake surfacewater monitoring</i> | Monitoring will be in water bodies situated in the immediate vicinity of construction activities, with sampling points located both upstream and downstream of the discharge locations.<br><br><i>Monitoring will be undertaken for the following parameters:</i> <ul style="list-style-type: none"> <li>pH, Total Dissolved Solids (TDS), Dissolved Oxygen (DO); and Water colour.</li> </ul> <i>Monitoring will be in accordance with the approved SW&amp;GWOS</i> | Construction      | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>Surfacewater flows have not been observed within the Development Envelope during the reporting period.  |                          |
| <b>Erosion &amp; Sedimentation Monitoring</b><br>S7.3 | Monitoring of erosion and sedimentation will be undertaken during construction activities.  | Monthly visual inspections of the construction site after heavy rainfall events:   | Construction      | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>Surfacewater flows have not been observed within the Development Envelope during the reporting period. No sedimentation and or erosion has been observed during the reporting period. |                          |

| Audit Code                                    | Commitment  | Requirement and Schedule  | Phase                | Compliance Status | Further Information   | Supporting Documentation |
|---|---|---|----------------------|-------------------|---|--------------------------|
|   |   | <ul style="list-style-type: none"> <li>Identifying areas where erosion is occurring in areas close to surfacewater.</li> <li>Identifying areas where excess sediment is entering surfacewater bodies.</li> </ul>  |                      |                   |   |                          |
| <b>Groundwater Level Monitoring</b><br>S7.4   | Groundwater monitoring will be undertaken.  | Groundwater monitoring will be undertaken <ul style="list-style-type: none"> <li>Prior to the commencement of abstraction from each bore.</li> <li>Then every two months at bores where abstraction is occurring.</li> </ul>  | Construction         | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No groundwater abstraction has been undertaken within the Development Envelope or within a 500-metre radius of groundwater dependent ecosystems during the reporting period. |                          |
| <b>Groundwater Quality Monitoring</b><br>S7.5 | Determine if groundwater quality is potentially impacted by construction activities and are significantly different from background water quality levels. | Determine if groundwater quality is potentially impacted by the construction activities: <ul style="list-style-type: none"> <li>Groundwater quality monitoring will be undertaken prior to or at the commencement of groundwater abstraction activities.</li> </ul>   | Overall – all stages | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No groundwater abstraction from any bores has been undertaken within the Development Envelope during the reporting period.   |                          |
|   |   | Bi-monthly (every two months) groundwater quality monitoring will be undertaken at all groundwater bores <b>within the Development Envelope</b> where groundwater abstraction for the purposes of construction water abstraction is occurring.<br><br><i>The following water quality parameters will be measured:</i> <ul style="list-style-type: none"> <li>pH, Salinity (EC); and TRH.</li> </ul> | Overall – all stages | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No groundwater has been abstracted from any bores located within the Development Envelope during the reporting period.   |                          |

| Audit Code                                   | Commitment  | Requirement and Schedule   | Phase   | Compliance Status                           | Further Information  | Supporting Documentation |
|--|---|--|---|---|--|--------------------------|
| <p><b>Exceedance Response</b><br/>S8</p>     | <p>Exceedance response to DCCEEW.</p>   | <ul style="list-style-type: none"> <li>Report the details of the location, nature, and magnitude of the exceedance in writing to DCCEEW within five business days of becoming aware of the exceedance.</li> <li>Within two business days, commence implementing the applicable threshold exceedance contingency actions.</li> <li>Undertake an investigation to determine the cause of the exceedance and the extent of impact(s) to protected matter(s) and habitats. The outcome of this investigation will be reported to DCCEEW within twenty business days of the exceedance being reported.</li> <li>Within 6 months of any such exceedance event(s), Main Roads will have this plan reviewed by an independent suitably qualified hydrologist or hydrogeologist to advise if the plan will need to be revised and how to prevent the exceedance reoccurring.</li> <li>Within 10 months of detecting any exceedance, Main Roads will submit to DCCEEW the advice of the report of the independent suitably qualified hydrologist or hydrogeologist and a version GSWOS revised to address the advice from the review for Minister approval.</li> </ul> | <p>Overall – all stages</p>                     | <p>Not applicable</p>                       | <p>This commitment has not been triggered during the reporting period.</p> <p>No groundwater has been abstracted from any bores located within the Development Envelope and no surfacewater flows have been observed within the Development Envelope during the reporting period.</p>  |                          |
| <p><b>Reporting</b><br/>S9<br/>Table 9-1</p> | <p>In addition to the exceedance response reporting described in Section 8, Main Roads will report to DCCEEW on the implementation of this GSWOS as part of annual compliance reporting under the conditions of approval for the Proposed Action.</p> | <p>Annual Compliance Report.</p> <p>Annual groundwater monitoring report (for abstraction bores <b>within the Development Envelope</b> within 750 m of groundwater dependent vegetation matters).</p>  | <p>Overall – all stages</p> <p>Construction</p> | <p>Not applicable</p> <p>Not applicable</p> | <p>No surfacewater flows were observed within the Development Envelope during the reporting period.</p> <p>No surfacewater exceedances have been identified during the reporting period.</p> <p>This commitment has not been triggered during the reporting period.</p> <p>No groundwater has been abstracted from any bores located within the Development Envelope or within</p> |                          |

| Audit Code   | Commitment  | Requirement and Schedule  | Phase                             | Compliance Status | Further Information  | Supporting Documentation |
|--|---|---|-----------------------------------|-------------------|--|--------------------------|
|  |   |   |                                   |                   | 750 m of groundwater dependant vegetation during the reporting period.   |                          |
|  |   | Notification of exceedance of any threshold criteria: <ul style="list-style-type: none"> <li>Within five business days of becoming aware of an exceedance.</li> </ul>                               | Construction                      | Not applicable    | This commitment has not been triggered during the reporting period.  |                          |
|  |   | Environmental incident investigation report: <ul style="list-style-type: none"> <li>Within 20 business days of becoming aware of an exceedance having been initially reported to DCCEEW.</li> </ul> | Construction                      | Not applicable    | This commitment has not been triggered during the reporting period.  |                          |
|  |   | Independent audit of compliance with conditions: <ul style="list-style-type: none"> <li>Every three years, following commencement of the action.</li> </ul>   | Construction<br>Post construction | Not applicable    | This commitment has not been triggered during the reporting period.<br>Independent audit of compliance with conditions is not due until July 2028.   |                          |
| <b>Environmental Auditing</b><br>S10.1<br>Table 10.1               | This GSWOS will be audited annually by Main Roads during construction of the Proposed Action to ensure the implementation of the management and monitoring measures, and to confirm the management measures specified are achieving the environmental outcomes. | Review of construction procedures to ensure GSWOS management / monitoring actions are incorporated within works procedures.   | Pre construction                  | Compliant         | A review of construction procedures to ensure GSWOS management / monitoring actions are incorporated into the contractors works procedures was completed prior to construction commencing.   |                          |
|  |   | Inspections by site environmental personnel (or representative) to identify compliance with GSWOS: <ul style="list-style-type: none"> <li>Periodic (monthly during construction).</li> </ul>        | Construction                      | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No groundwater has been abstracted from any bores located within the Development Envelope and no surfacewater flows have been observed within the Development Envelope during the reporting period. |                          |
|  |   | Independent 'third-party' audit for assessment of compliance with GSWOS: <ul style="list-style-type: none"> <li>Annually (once per calendar year until completion of construction).</li> </ul>      |                                   | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>No groundwater has been abstracted from any bores located within the Development Envelope and no surfacewater flows have been observed within the Development Envelope during the reporting period. |                          |
| <b>Environmental Management Plan Review</b><br>S10.2<br>Table 10-2 | Main Roads proposes to review this GSWOS every three years. The proposed reviews will be undertaken by a suitably qualified hydrologist or hydrogeologist.  | Review of GW&SWOS management and monitoring actions: <ul style="list-style-type: none"> <li>Annually (once per calendar year).</li> </ul>   | Overall – all stages              | Compliant         | The Groundwater and Surfacewater Operating Strategy is reviewed annually as part of the assessment of the proposals compliance against the approval conditions. No changes to the management plan were required.   |                          |
|  |   | <ul style="list-style-type: none"> <li>Review of GSWOS by independent, suitably qualified hydrologist and hydrogeologist.</li> </ul>  | Construction                      | Not applicable    | This commitment has not been triggered during the reporting period.<br><br>A review of the Groundwater and Surfacewater Operating Strategy by a suitably qualified hydrologist   |                          |

| Audit Code                           | Commitment  | Requirement and Schedule  | Phase                | Compliance Status | Further Information   | Supporting Documentation |
|--------------------------------------|---|---|----------------------|-------------------|---|--------------------------|
|                                      |   | <ul style="list-style-type: none"> <li>Advise if GSWOS requires further revision to prevent threshold criterion exceedance from reoccurrence.</li> <li>Within six months of a threshold criteria exceedance occurring.</li> </ul>   |                      |                   | or hydrogeologist is not required until 2028.   |                          |
|                                      |   | <p>In the event of any threshold criteria having been exceeded:</p> <ul style="list-style-type: none"> <li>Independent hydrologist and hydrogeologist review report of GSWOS to be prepared and submitted to DCCEEW.</li> <li>Within ten months of any exceedance having been initially reported to DCCEEW.</li> </ul>  | Construction         | Not applicable    | This commitment has not been triggered during the reporting period.   |                          |
|                                      |   | <ul style="list-style-type: none"> <li>Revised copy of GSWOS (to address review report from independent hydrologist and hydrogeologist) to be prepared and submitted to DCCEEW.</li> <li>Within ten months of any exceedance having been initially reported to DCCEEW.</li> </ul>   |                      | Not applicable    | This commitment has not been triggered during the reporting period.   |                          |
| <b>Environmental Training</b><br>S12 | Main Roads will ensure that all individuals employed in the construction of the KTP Stage 4 have the appropriate training and experience required to successfully implement this GSWOS. | <p>All personnel will receive environmental awareness training, applicable to their roles and responsibilities. Environmental awareness training will include the following formats where applicable:</p> <ul style="list-style-type: none"> <li>Toolbox talks - delivered as part of daily pre-start briefings to the workforce.</li> <li>Inductions - these will include the following key elements, as a minimum:                             <ul style="list-style-type: none"> <li>Hydrocarbon and chemical handling and storage requirements.</li> <li>Erosion, scour, and sedimentation control measures.</li> <li>'No-go' areas.</li> </ul> </li> </ul> | Overall – all stages | Compliant         | <p>All personnel are required to complete a site induction prior to commencing work. The site induction includes environmental awareness and environmental responsibilities.</p> <p>Weekly Toolbox talks and daily pre-start meetings are undertaken. Safety and environmental aspects are discussed.</p> |                          |

| Audit Code | Commitment | Requirement and Schedule   | Phase | Compliance Status | Further Information | Supporting Documentation |
|------------|------------|--|-------|-------------------|---------------------|--------------------------|
|            |            | <ul style="list-style-type: none"> <li>- Groundwater dependent vegetation importance and key mitigation responses.</li> <li>• Incident response training (i.e. spill response drills).</li> <li>• Task briefings.</li> </ul> |       |                   |                     |                          |

**Appendix D: Table 5. Summary of Compliance with Proponent Environmental Management Commitments – Impact Reconciliation Procedure – Audit Table**

| Audit Code   | Commitment  | Requirement and Schedule  | Phase  | Compliance Status                           | Further Information   | Supporting Documentation |
|--|---|---|--|---|---|--------------------------|
| <b>Offsets required by EPBC ACT Approval</b><br>S3.2.2 | Condition 15 of the draft EPBC Act approval decision notice 2020/8725 requires the approval holder to compensate for the residual significant impacts of clearing and/or impacts of critical habitat and supporting habitat for the Northern Quoll, Ghost Bat, Pilbara Leaf-nosed Bat and Pilbara Olive Python. | <ul style="list-style-type: none"> <li>To offset these impacts the approval holder must make financial contributions to the PEOF.</li> </ul>  | Overall – all stages                                 | Compliant                                   | Main Roads has made an initial 10% payment to the Pilbara Environment Offset Fund as required by Condition 15 of this approval on 18/04/2023.<br><br>The next PEOF payment is due in July 2027.   |                          |
| <b>Ground Disturbance Permits</b><br>S3.3              | A ground disturbance permit process will be developed by the contractor and signed off by the Main Roads Superintendent.  | <ul style="list-style-type: none"> <li>Review of the disturbance area against the approval boundary.</li> <li>All clearing areas will be demarcated and approved by reviewed the Main Roads Superintendent prior to clearing commencing.</li> <li>All clearing areas will be checked and confirmed post-clearing (as per Main Roads Specification 301 – Vegetation Clearing and Demolition).</li> </ul>   | Construction<br><br>Construction<br><br>Construction | Compliant<br><br>Compliant<br><br>Compliant | The contractor has a ground disturbance and clearing protocols outlined in their Construction Environmental Management Plan and reflected in the Ground Disturbance and Clearing Permit.<br><br>All clearing areas are pegged out by licenced surveyors, and boundaries are clearly demarcated. The pegged out areas ready clearing are reviewed and approved by Main Roads representative prior to any ground disturbance activities commencing.<br><br>All clearing areas are checked and confirmed post-clearing to ensure clearing is within clearing boundaries. |                          |
| <b>Determine the extent of clearing</b><br>S3.4        | On an annual basis a spatial assessment will be undertaken to confirm the extent of vegetation (and associated fauna habitat type) that was cleared.  | <ul style="list-style-type: none"> <li>A spatial analysis will be used to compare the state of the vegetation and habitat at the end of each financial year with the 'baseline' state of vegetation and habitat which existed prior to the Proposed Action's clearing activities occurring.</li> <li>The spatial assessment will be ground truthed by the digital ground survey data that will be collected after completion of vegetation clearing via a digital ground survey in accordance with Main Roads Digital Ground Survey Standard 67-08-43 to capture the As Constructed Vegetation Clearing Area data.</li> </ul> | Construction<br><br>Construction                     | Compliant<br><br>Compliant                  | A spatial analysis has been conducted prior the end of this reporting period to compare the state of vegetation and habitat with the 'baseline' state of vegetation and habitat.<br><br>The spatial assessment was ground truthed by the digital ground survey data that was collected after completion of vegetation clearing.   |                          |
| <b>Reporting</b><br>S4                                 | The Proponent will prepare one or more Impact Reconciliation Reports (IRRs) to document the clearing undertaken.  | The IRRs will be provided to DCCEEW to enable DCCEEW to determine the contributions payable.  | Overall – all stages                                 | Not applicable                              | This commitment has not been triggered during the reporting period.   |                          |

| Audit Code                                       | Commitment  | Requirement and Schedule   | Phase                             | Compliance Status     | Further Information  | Supporting Documentation |
|--|---|--|-----------------------------------|-----------------------|--|--------------------------|
|  |   | <ul style="list-style-type: none"> <li>IRRs will be submitted biennially (from the time of approval of the Proposed Action);                             <ul style="list-style-type: none"> <li>The first reporting period will commence on the day clearing for Stage 4 commences, ending on 30 June two years later.</li> <li>Successive reporting periods run from 1 July of the same year to 30 June two years later.</li> </ul> </li> </ul> |                                   |                       | The first IRR report is due 15 July 2027.  |                          |
| <b>Frequency and timing</b><br>S4.1<br>Table 4-1 | <b>Reporting Year</b><br>Upfront payment.   | Initial payment (as part of the Commonwealth requirement for 10% of the overall clearing allowable). <ul style="list-style-type: none"> <li>Prior to commencement of action.</li> </ul>  | Pre construction                  | Compliant & completed | Main Roads has paid the required initial 10% payment on 23/04/2023 prior to construction activities commencing.  |                          |
|  |   | Approval holder to submit evidence of payment into PEOF account to the Commonwealth department of Environment: <ul style="list-style-type: none"> <li>Upon payment.</li> </ul>   | Overall - all stages              | Compliant             | Main Roads have provided the Department with a copy of the receipt for the amount paid into the PEOF fund via email on 8/04/2024.                              |                          |
|  | <ul style="list-style-type: none"> <li>Period 1*</li> </ul> * Period 1 is less than two years to align with a financial year reporting period | First reporting period* <ul style="list-style-type: none"> <li>The day clearing commences to 30 June two years later.</li> </ul>   | Construction                      | Not applicable        | This commitment has not been triggered during the reporting period. The 1 <sup>st</sup> Impact Reconciliation Report, reporting period is due on 15 July 2027. |                          |
|  |   | <ul style="list-style-type: none"> <li>Aerial survey/ground-truthing.</li> </ul>   | Construction<br>Post construction | Not applicable        | This commitment has not been triggered during the reporting period.  |                          |
|  |   | Impact Reconciliation Report submitted to DWER: <ul style="list-style-type: none"> <li>30 October of the year of the end of reporting period.</li> </ul>   | Construction<br>Post construction | Not applicable        | This commitment has not been triggered during the reporting period.  |                          |
|  |   | Approval holder to submit evidence of payment into the PEOF account to the Commonwealth Department of Environment: <ul style="list-style-type: none"> <li>Upon payment.</li> </ul>   | Construction<br>Post construction | Not applicable        | This commitment has not been triggered during the reporting period.  |                          |
|  | Period 2^<br><br>Repeat Period 1 actions should impacts occur in the following 2-year periods   | Second biennial reporting period <ul style="list-style-type: none"> <li>1 July to 30 June of the subsequent biennial period.</li> </ul>  | Construction<br>Post construction | Not applicable        | This commitment has not been triggered during the reporting period.  |                          |

| Audit Code | Commitment   | Requirement and Schedule  | Phase                             | Compliance Status | Further Information   | Supporting Documentation |
|------------|--|---|-----------------------------------|-------------------|---|--------------------------|
|            |  | Aerial survey/ground-truthing<br>TBC  | Construction<br>Post construction | Not applicable    | This commitment has not been triggered during the reporting period. |                          |
|            |  | Impact Reconciliation Report submitted to DWER:<br><ul style="list-style-type: none"><li>30 October of the year of the end of reporting period.</li></ul>                       | Construction<br>Post construction | Not applicable    | This commitment has not been triggered during the reporting period. |                          |
|            |  | Approval holder to submit evidence of payment into PEOF account to the Commonwealth Department of Environment:<br><ul style="list-style-type: none"><li>Upon payment.</li></ul> | Construction<br>Post construction | Compliant         | Payment receipt has been provided to the Department                 |                          |
|            |  | "Final" IRR submitted to DCCEEW<br>Within 6 months of the completion of clearing.<br><br><i>Post clearing stage</i>   | Construction                      | Not applicable    | This commitment has not been triggered during the reporting period. |                          |
|            | <i>No clearing is expected after the end of the last reporting period.</i> | The Proponent will notify the Department in writing of the actual clearing footprint and the total contributions made into the PEOF.  | Construction                      | Not applicable    | This commitment has not been triggered during the reporting period. |                          |