

29 April 2022

Stuart Cowie
Executive Director – Compliance and Enforcement
Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919

Dear Stuart,

Lake Wells Sulphate of Potash Project Ministerial Statement No. 1162 – Annual Compliance Assessment Report

In accordance with Condition 4-6 of Ministerial Statement No. 1162, please find enclosed the 2021 Annual Compliance Assessment Report for the Lake Wells Sulphate of Potash project. The report has been prepared in accordance with the Lake Wells Potash Project Compliance Assessment Plan and covers the period 1 February 2021 to 31 January 2022. This report is endorsed by Matt Shackleton, Chief Executive Officer.

If you have any enquiries, please contact Matt Shackleton at m.shackleton@australianpotash.com.au or on 9322 1003.

Yours faithfully,



Matt Shackleton
Chief Executive Officer

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Annual Compliance Assessment Report

Ministerial Statement No 1162

Lake Wells Sulphate of Potash Project

1 February 2021 to 31 January 2022

29 April 2022

Document Reference: APC-LW-ENV-001 Rev A



Revision

Author

Reviewer

Approver

Date

A

Ryan Duncan

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Matt Shackleton

29 April 2022

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1. Introduction

1.1 Project Overview

Australian Potash Limited (APC) is currently developing its 100% owned Lake Wells Sulphate of Potash (LSOP) project (the project) within the Lake Wells playa system. The project is located 180 km north-east of Laverton in Western Australia.

The Lake Wells Potash Project comprises two adjoining development envelopes, one On Playa and one Off Playa. The project includes the development of a brine extraction borefield, raw water borefield, pre-concentration ponds, HDPE-lined harvest ponds, power station, processing plant, reject salts storage area, bitterns storage area, village, water treatment facilities and associated infrastructure.

On average the project is expected to produce 170,000 tpa of high purity Sulphate of Potash (SOP, K_2SO_4) to supply global fertilizer demand for the next 30 years. The project represents a long-life, low-cost supply of SOP sourced from a saline aquifer.

1.2 Environmental Approvals

The Project was referred to the Office of the Environmental Protection Authority (OEPA) under Section 38 of the *Environmental Protection Act 1986* (EP Act) on 21 December 2017. On 5 February 2018, the EPA determined that the Proposal would be assessed at the level of Environmental Review with no public review (EPA Assessment No. 2144).

The EPA Report (1688) was issued on 7 September 2020 (EPA 2020a) and APC received Ministerial approval for the project under Ministerial Statement 1162 (MS1162), on 1 February 2021.

1.2.1 MS1162 Amendments

MS1162 was amended under S45c of the EP Act on 25 January 2022 to allow the following:

- Realignment of the on-playa development envelope and operations resulting in 498 ha increase in the development envelope and reduction of disturbance by 1,015 ha.
- Realignment of the off-playa development envelope and operations resulting in 2,199 ha reduction in development envelope and reduction in clearing of 247 ha.
- Increase the rate of brine abstraction in the first 16 years to 21.3 GL per annum with abstraction rates dropping during years 17 to 30, resulting in an overall abstraction of up to 597 GL over the life of the project.
- Increase in process/potable water abstraction by 0.3 GL per annum.

1.3 Scope and Purpose

This Compliance Assessment Report (CAR) assesses compliance against MS1162 in accordance with Condition 4-6. The following Environmental Management Plans referenced in MS1162 are also assessed in this Compliance Assessment Report:

- Fauna Management Plan - Lake Wells Potash Project (18 August 2020)
- Groundwater Monitoring Strategy - Lake Wells Potash Project (20 August 2020)
- Cultural Heritage Management Plan (CHMP) (26 May 2021)

This initial Compliance Assessment Report covers the period 1 February 2021 to 31 January 2022. This CAR is also notice to the CEO of substantial commencement of the Proposal in accordance with condition 3-2 of

MS1162. A summary of compliance is provided in Section 3. Detailed compliance assessment findings are presented in Attachments B & C.

2. Summary of Project Implementation Status

During the reporting period, the following activities relevant to MS1162 were completed:

- A total of 16 new brine abstraction bores were drilled and developed (bringing the total number of brine abstraction bores to 20) using 2 drill rigs operating on a 24/7 basis.
- Pump testing was completed on 14 of the bores to yield additional aquifer information.
- A water supply system comprising bore pump, riser, tanks, transfer pumps, generator and a pipeline supplying raw water to the village was established.
- Mobilization of earthworks contractors to complete clearing associated with the village, laydown areas, access tracks, bore pads and bore sumps was executed. A total of 32.3 ha of clearing was conducted in the compliance year, with the majority (29.7 ha) conducted in the on-playa disturbance envelope, comprising access tracks, bore drill pads and sumps. The remaining disturbance (2.6 ha) was restricted to the village.
- A permanent 20 person village was installed, and services run for the full 200 person village. Additional temporary accommodation up to 50 persons was also brought online and offline as site activities dictated.
- A Raw Water Treatment plant (RWTP), Waste Water Treatment Plant (WWTP), workshops, dome shelters, site office buildings, mess and other associated infrastructure were constructed, for the village.
- An archaeological survey was conducted in line with the approved CHMP to assess certain high risk areas.
- Community engagement meetings were scheduled and invitations issued for the 29th November 2021, mid January 2022. Due to COVID restrictions these meetings were conducted via Webinar (online). Participants were provided with an overview of the project, updates on its current status and upcoming activities. No significant feedback was received from participants of these engagements.
- Deployment of dedicated software packages to support compliance were implemented, including a GIS system, Ground Disturbance Permit system, controlled document management system (CDMS) and dedicated compliance software suite (INX).
- Granting of additional Mining Leases (M38/1287, M38/1288 and M38/1289) was completed in October 2021.

It should be noted that there were no substantive amounts of brine abstracted during the compliance assessment year. Australian Potash considers the project to have substantially commenced on the basis of activities commenced during the compliance year. A select number of photos are provided below to show some of these activities.

Photo 1 – Typical bore pad and access track preparation



Photo 2 – Aerial image of village showing accommodation rooms, mess, offices, water treatment and workshops



Photo 3 – Typical image of access track on playa and bore pads



Photo 4 – Typical bore drilling setup, showing first water from the commencement of bore drilling campaign



3. Compliance Summary

The Compliance Assessment Report determined that Australian Potash (APC):

- Recorded 2 (associated) minor non-compliances with the conditions of MS1162;
- Recorded compliance with all other conditions of MS1162 requiring assessment and achieved the stated environmental objectives; and
- Is in compliance with the requirements contained in the associated management plans referenced in MS1162.

Summaries of the non-compliances against MS1162 are provided in sections 3.1.1 and 3.1.2.

Compliance statuses are classified in accordance with definitions provided in *Post Assessment Guidelines for Preparing a Compliance Assessment Report* (EPA).

3.1 Implementation Conditions

The following describes the non-compliances that occurred during the period 1 February 2021 to 31 January 2022.

3.1.1 MS1162:1-1

An area of approximately 0.1 ha, comprising a track of 262 m length and 4 m width, was cleared that exceeded the authorised extent of the on-playa development envelope. APC responded to a DWER query (DWERT6129) on 26 November 2021 and subsequently received a letter of warning from DWER on 22 December 2021 (DWERT6129).

The clearing occurred outside of the on-playa Ministerial Statement development envelope. The cleared area falls within the subsequently approved S45C development boundary. The clearing is a non-compliance due to it exceeding the authorised development envelope.

The incident occurred as a result of a combination of new staff onboarding, the partial implementation (at that time) of ground disturbance procedures and staff familiarity with the Project. Australian Potash has adopted and fully embedded a ground disturbance permit process, a GIS system and uses field based tablets capable of GPS location tracking to manage clearing and boundary identification.

All proposed remedial actions to prevent a reoccurrence have been implemented prior to submitting this Compliance Assessment Report.

3.1.2 MS1162:M4.5

MS1162:M4.5 requires APC to advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known. This non-compliance is related to the non-compliance referred to in Section 3.1.1. As part of the Section 45C process to revise the Project development envelope from the original Ministerial Statement approved area, DWER raised a concern (DWERT6129) that an area of ~0.8 ha of clearing outside the approved Ministerial Statement development envelope (at the time) had occurred.

APC subsequently conducted an investigation and showed that ~0.1 ha had been cleared and APC had failed to notify the CEO of the EPA within 7 days of the event becoming known. APC responded to a DWER query (DEWRT6129) on 26 November 2021 and subsequently received a letter of warning from DWER on 22 December 2021 (DWERT6129).

The incident occurred as a result of a combination of new staff onboarding, the partial implementation (at that time) of ground disturbance procedures and staff familiarity with the project. Australian Potash has

adopted and fully embedded a ground disturbance permit process, a GIS system and uses field based tablets capable of GPS location tracking to manage clearing and boundary identification.

All proposed remedial actions to prevent a recurrence have been implemented prior to submitting this Compliance Assessment Report.

3.2 Management Plan Conditions

Australian Potash did not record any non-compliances associated with the management plans referenced in MS1162.

3.3 Statement of Compliance

A compliance status form (Form 2) is provided in Attachment 1 of this document. This report is endorsed by the Chief Executive Officer of Australian Potash through the use of Form 2.

Attachment A: Post Assessment Form 2: Statement of Compliance

Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	<i>Lake Wells Potash Project</i>
Statement Number	<i>Ministerial Statement 1162</i>
Proponent Name	<i>Australian Potash Limited</i>
Proponent's Australian Company Number <i>(where relevant)</i>	ACN 149 390 394

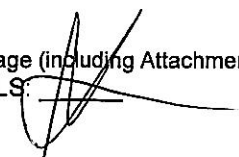
2. Statement of Compliance Details

Reporting Period	<i>1/02/21 to 31/01/22</i>
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Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input checked="" type="checkbox"/>	Construction	<input checked="" type="checkbox"/>	Operation	<input type="checkbox"/>	Decommissioning	<input type="checkbox"/>

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	Attachment 2
<p>An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table must be prepared and maintained in accordance with the Department of Water and Environmental Regulation (DWER) <i>Post Assessment Guideline for Preparing an Audit Table</i>, as amended from time to time. The 'Status Column' of the audit table must accurately describe the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms that may be used by the proponent in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.</p>	

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

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

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

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

Non-compliance/potential non-compliance 3--1

Which implementation condition or procedure was non-compliant or potentially non-compliant?
M1.1
Was the implementation condition or procedure non-compliant or potentially non-compliant?
Non-compliant
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?
26 June 2021

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally Date _____ <input checked="" type="checkbox"/> Reported to DWER in writing Date <u>26/11/2021</u>	<input type="checkbox"/> No

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?
An area of approximately 0.1 ha, comprising a track of 262 m length and 4 m width, was cleared that exceeded the authorised extent of the on-playa development envelope in effect at the time of the clearing. The extent of the impacts were minor and rehabilitation of the cleared area, which is not a permanent feature of the operation moving forward, has been completed.
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)
Refer to Figure 1 below

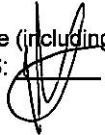
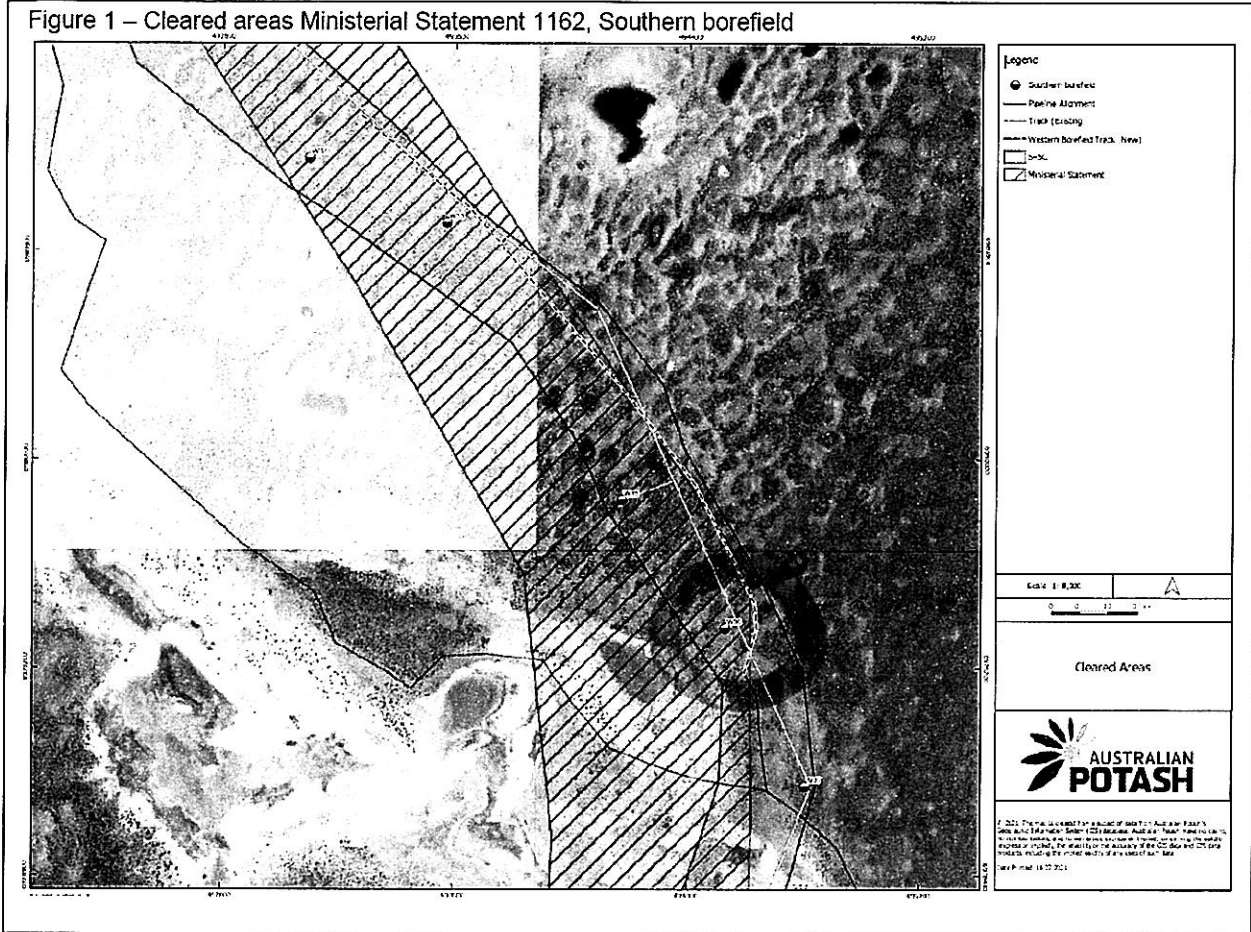
Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.
 INITIALS: 

Figure 1 – Cleared areas Ministerial Statement 1162, Southern borefield



What was the cause(s) of the non-compliance or potential non-compliance?

The incident occurred as a result of a combination of new staff onboarding, the partial implementation (at that time) of ground disturbance procedures and staff familiarity with the project.

What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?

Australian Potash has a fully embedded ground disturbance permit process, a GIS system and uses field based tablets capable of GPS location tracking to manage clearing and boundary identification. All proposed remedial actions to prevent a reoccurrence have been implemented prior to submitting this Compliance Assessment Report.

What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?

Prior to the incident, maps and standard GPS 'chainage' point were used to direct site based clearing activities. The use of GPS handheld units was improved by using a tablet based system that could visually show applicable boundaries at a greater accuracy than the handheld GPS. In addition, boundary demarcation for areas close to the development envelope was introduced with a licensed surveyor.

Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:

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

INITIALS:


- in the reporting period addressed in this Statement of Compliance; and
 - as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.
- (the above information may be provided as an attachment to this Statement of Compliance)

Non-compliance/potential non-compliance 3-2

Which implementation condition or procedure was non-compliant or potentially non-compliant?
M4.5
Was the implementation condition or procedure non-compliant or potentially non-compliant?
Non-compliant
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?
On the 16/7/2021, cleared areas were input into the GIS system for the first time as part of its' setup and initiation. On this day a map was produced that showed the minor area where the clearing described above (M1.1) had exceeded the Ministerial Statement development envelope. APC failed to recognize this at the time and did not report the non-compliance to the CEO of the EPA within 7 days.

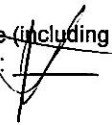
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally Date _____ <input checked="" type="checkbox"/> Reported to DWER in writing Date <u>26/11/2021</u>	<input type="checkbox"/> No

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?
As part of the Section 45C process to revise the project development envelope from the original Ministerial Statement approved area, DWER raised a concern (DWERT6129) that an area of ~0.8 ha of clearing outside the approved Ministerial Statement development envelope (at the time) had occurred. APC subsequently conducted an investigation and showed that ~0.1 ha had been cleared and APC has failed to notify the CEO of the EPA within 7 days of the event becoming known. APC responded to a DWER query (DWERT6129) on 26 November 2021 and subsequently received a letter of warning from DWER on 22 December 2021 (DWERT6129). The extent of the impacts were minor and rehabilitation of the cleared area, which is not a permanent feature of the operation moving forward, has been completed.
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)
Refer to Figure 1 above.
What was the cause(s) of the non-compliance or potential non-compliance?
The non-compliance resulted from unfamiliarity with the Ministerial Conditions at that point in time.
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?
Australian Potash is implementing the INX suite of software products to track incidents and compliance. In addition a compliance training package and presentation is being developed for staff.

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

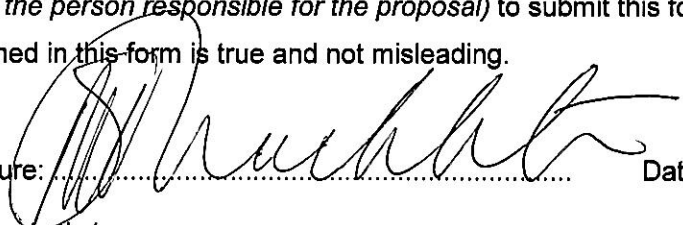
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?
Not applicable
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: <ul style="list-style-type: none">• in the reporting period addressed in this Statement of Compliance; and• as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. (the above information may be provided as an attachment to this Statement of Compliance)

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

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

4. Proponent Declaration Matthew Shackleton
Managing Director & CEO

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

Signature:  Date: 29/04/2022

Please note that:

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

5. Submission of Statement of Compliance

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

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

6. Contact Information

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

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

Postal Address: Locked Bag 10
 Joondalup DC
 WA 6919
 Phone: (08) 6364 7000
 Email: compliance@dwer.wa.gov.au

7. Post Assessment Guidelines and Forms

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

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

INITIALS: 

ATTACHMENT 1

Table 1 Compliance Status Terms

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

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

INITIALS:

Attachment B: Compliance status of key characteristics and MS 1162 Audit Table Lake Wells Sulphate of Potash

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- This audit table is a summary of the requirements applying to this proposal. Refer to the Statement issued for the proposal under Part IV of the EP Act for details/precise wording of audit elements.
- Code prefixes: M = Minister’s condition, P = Proponent’s commitment, N = Procedure.
- Abbreviations: CAR = Compliance Assessment Report; CEO = Chief Executive Officer of OEPA; Minister for Env = Minister for the Environment; OEPA = Office of the Environmental Protection Authority.
- Compliance Status: C = Compliant, CLD = Completed, NC = Non – compliant, NR = Not Required at this stage. Please note the terms NA = Not Audited and VR = Verification Required are only for OEPA use. IP = In Process may only be used by the proponent in circumstances outlined in Section 2.8 of the *Post Assessment Guideline for Preparing an Audit Table*.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1162:M1.1	Proposal Implementation	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.	Implement project pursuant to Table 2 in Schedule 1 of Ministerial Statement No. 1162.	CAR	Overall	Life of proposal.	Non-compliant	<p>APC flew satellite imagery capture on 18 February 2022, achieving a very high resolution (50 cm) data set using the Airbus Pleiades satellite. Clearing records were used to assess clearing completed as at the end of the compliance year (31 January 2022).</p> <p>Total capture area was 107.3 km² and focussed on the western and northern sections of the site, where ground disturbing activities have occurred. The capture region was extended approx. 750 m to the outside of the development envelope to assess any activities that may have exceeded the authorised extent of Table 2 of Schedule 1 of MS1162.</p> <p>The disturbance areas were cross referenced to internal ground disturbance permits, previous approvals and then categorised and digitised by an external GIS consultant and are summarised below.</p> <p>Non-compliant activity An area of approximately 0.1 ha, comprising a track of 262 m length and 4 m width, was cleared that exceeded the authorised extent of the on-playa development envelope at the time of the clearing event. APC responded to a DWER query (DWERT6129) on 26 November 2021 and subsequently received a letter of warning from DWER on 22 December 2021 (DWERT6129).</p> <p>Compliant activity Apart from the above noted non-compliance, APC implemented all other clearing activities in compliance with Table 2 of Schedule 1 as follows:</p> <p>Physical elements On-playa disturbance: Total disturbance of 29.7 ha was recorded during the compliance year. Cumulative total disturbance is 29.7 ha which remains below the authorised extent of 2,470 ha within the 9,322 ha on-playa development envelope</p> <p>Off-playa disturbance: Total disturbance of 2.6 ha was recorded during the compliance year. Cumulative total disturbance is 2.6 ha which remains below the authorised extent of 750 ha within the 4,629 ha off-playa development envelope</p> <p>Operational elements Brine abstraction: 0 kl of abstraction remains below the authorised abstraction of 17 Gl/yr Process/potable water abstraction: <0.01 kl remains below 0.8 Gl/yr Power plant: Power generation onsite remains below 10 megawatts</p>
1162:M2.1	Contact Details	The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Notify the CEO of any change in proponent details in writing.	Copy of written notification to the CEO of any change in proponent details.	Overall	Within twenty-eight (28) days of any change of name, physical address or postal address.	Compliant	No physical address change or change in name occurred during the reporting period.
1162:M3.1	Time Limit for Proposal Implementation	The proponent shall not commence implementation of the proposal after five (5) years from the date of this Statement, and any commencement, prior to this date, must be substantial.	Provide evidence to the CEO in writing to demonstrate the proposal has substantially commenced.	Photographs to be included in the CAR.	Overall	Substantially commence proposal by 1 February 2026.	Compliant	Section 2 of this Compliance Assessment Report (CAR) is considered notification of substantial project commencement.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1162:M3.2	Time Limit for Proposal Implementation	Any commencement of implementation of the proposal, within 5 years from the date of this statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of 5 years from the date of this statement.	Provide evidence to the CEO in writing to demonstrate the proposal has substantially commenced. Photographs will be included.	Copy of written notification to CEO of substantial commencement. This may be in the form of the first CAR following commencement of construction.	Overall	Provide written evidence and photographs by 1 February 2026.	Compliant	Section 2 of this Compliance Assessment Report (CAR) is considered notification of substantial project commencement.
1162:M4.1	Compliance Reporting	The proponent shall prepare and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation of the proposal, whichever is sooner.	Submit a Compliance Assessment Plan (CAP).	CAP and written evidence of submission.	Overall	Submit CAP by 30 October 2021.	Compliant	APC submitted a Compliance Assessment Plan on 26 October 2021 to the Department of Water and Environmental Regulation and subsequently received notice of approval on 4 November 2021 (Reference: DWERDT521319).
1162:M4.2	Compliance Reporting	The Compliance Assessment Plan shall indicate: <ol style="list-style-type: none"> the frequency of compliance reporting; the approach and timing of compliance assessments; the retention of compliance assessments; the method of reporting of potential non-compliances and corrective actions taken; the table of contents of Compliance Assessment Reports; and public availability of Compliance Assessment Reports. 	Submit CAP with requirements under 4-2.	CAP	Overall	Submit CAP by 30 October 2021.	Compliant	APC submitted a Compliance Assessment Plan on 26 October 2021 to the Department of Water and Environmental Regulation and subsequently received notice of approval on 4 November 2021 (Reference: DWERDT521319).
1162:M4.3	Compliance Reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2 the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.	Once approval is received from the CEO, commence compliance assessment in accordance with the CAP.	CEO letter approving the CAP. CAR	Overall	After receiving notice in writing from the CEO that the CAP satisfies the requirements of condition 4-2.	Compliant	This inaugural Compliance Assessment Report (CAR) has been prepared in accordance with the approved Compliance Assessment Plan (CAP), approval on 4 November 2021 (Reference: DWERDT521319).
1162:M4.4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 4-1 and shall make those reports available when requested by the CEO.	Retain CAR's and make available when requested by the CEO.	CAR	Overall	When requested by the CEO.	Compliant	APC shall retain this completed Compliance Assessment Report on their internal SharePoint and/or CDMS and the associated evidence.
1162:M4.5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.	Written notification to the CEO of potential non-compliances in writing and/or verbally. Any verbal notification must be followed by written notification.	CAR Written notification to CEO advising of any potential non-compliance.	Overall	Within seven (7) days of a non-compliance being known.	Non-compliant	As part of the Section 45C process to revise the project development envelope from the original Ministerial Statement approved area, DWER raised a concern (DWERT6129) that an area of ~0.8 ha of clearing outside the approved Ministerial Statement development envelope (at the time) had occurred. APC subsequently conducted an investigation and showed that ~0.1 ha had been cleared and APC has failed to notify the CEO of the EPA within 7 days of the event becoming known. APC responded to a DWER query (DWERT6129) on 26 November 2021 and subsequently received a letter of warning from DWER on 22 December 2021 (DWERT6129).
1162:M4.6	Compliance Reporting	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO. The Compliance Assessment Report shall: <ol style="list-style-type: none"> Be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf; Include a statement as to whether the proponent has complied with the conditions; Identify all potential non-compliances and describe corrective and preventative actions taken; Be made publicly available in accordance with the approved Compliance Assessment Plan; and Indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1. 	Provide CEO with CAR in accordance with CAP within required timeframe that reports on the previous 12 months.	Submission of CAR	Overall	Submit first CAR by 30 April 2022 after which a CAR is submitted annually.	Compliant	This Compliance Assessment Report complies with M4.6 in the following way: <ol style="list-style-type: none"> Form 2 is included as Attachment 1 and the report is endorsed by the APC CEO. Section 3 contains a statement of compliance. Sections 3.1 and 3.2 identify all potential non-compliances. This report will be made available at: australianpotash.com.au, following submission to DWER. APC has incorporated reporting against the management plans referenced in MS1162 as Attachment 3 of the Compliance Assessment Report and propose to carry this format forward for reporting purposes.
1162:M5.1	Public Availability of Data	Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal, the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)), management plans and reports	Make publicly available all CAPs, CARs and associated documentation on APC's website.	Copies of the CAPs and CARs available on APC's website (https://www.australianpotash.com.au).	Overall	Life of proposal	Compliant	Data will be made available in line with the Compliance Assessment Plan following the submission of this (the first) Compliance Assessment Report. Data will appear at australianpotash.com.au

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		relevant to the assessment of this proposal and implementation of this Statement.						
1162:M5.2	Public Availability of Data	<p>If any data referred to in condition 5-1 contains particulars of:</p> <ol style="list-style-type: none"> a secret formula or process; or confidential commercially sensitive information; <p>the proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.</p>	Written explanation to the CEO as to why data (if any) should not be made publicly available.	Copy of correspondence to the CEO.	Overall	Life of proposal	Not required	The data referred to in condition 5-1 does not contain any secret formula or process or confidential information. APC therefore does not need to request any of the data is not to be made publicly available.
1162:M6.1	Flora and Vegetation – Significant <i>Tecticornia</i> Species	<p>The proponent shall implement the proposal to meet the following environmental outcomes:</p> <ol style="list-style-type: none"> ensure there are no direct or indirect impacts, as a result of the proposal, within a 30-metre distance of the known locations of <i>Tecticornia</i> <i>aff. undulata</i> as shown in Figure 2 and described in Schedule 2 of this Statement, unless the CEO has confirmed by notice in writing that the proponent has demonstrated that the removal of these plants would not significantly impact on <i>Tecticornia</i> taxa in the region; ensure there are no direct or indirect impacts, as a result of the proposal, within a 50-metre distance of the known location of <i>Tecticornia</i> <i>sp. Sterile 1</i>, as shown in Figure 2 and described in Schedule 2 of this Statement, unless the CEO has confirmed by notice in writing that the proponent has demonstrated that the removal of the known individual would not significantly impact on <i>Tecticornia</i> taxa in the region; and ensure there are no direct or indirect impacts, as a result of the proposal, to the known population of <i>Tecticornia willisii</i> as shown in Figure 2 and described in Schedule 2 of this Statement. 	<p>No direct or indirect impacts within 30m distance of known locations of significant <i>Tecticornia</i> species described in Schedule 2 of MS1162.</p> <p>Areas with significant <i>Tecticornia</i> species described in Schedule 2 to be mapped and personnel to be made aware of areas to be avoided.</p>	CAR	Overall	Life of proposal	Compliant	<p>APC has not commenced pumping operations, filling of ponds or ground disturbance activities near to any of the identified populations of <i>Tecticornia</i> in the reporting year. Therefore, there are no direct or indirect impacts and the environmental objectives of M6.1 are being met.</p> <p>APC has deployed environmental signage near to <i>Tecticornia</i> <i>sp. Sterile 1</i>, being the closest location to any active work completed during the compliance year (WB14 pad).</p> <p>The locations of all plants listed in Schedule 2 of MS1162 have been incorporated into APC's GIS system together with a 50 m exclusion buffer and are shown in field based tablets and printed maps. Personnel are made aware of <i>Tecticornia</i> locations during inductions and they appear on printed maps at site.</p> <p>APC has conducted a visual inspection of the area and confirmed no disturbance to the <i>Tecticornia</i> species listed in Schedule 2 has occurred.</p>
1162:M6.2	Flora and Vegetation – Significant <i>Tecticornia</i> Species	To verify that the outcomes of condition 6-1 are met, the proponent shall ensure that monitoring of the known populations of significant <i>Tecticornia</i> species named in condition 6-1 and shown in Figure 2 of Schedule 1 is carried out by suitably qualified personnel, including observations of population extent and plant health, and signs of direct or indirect impacts.	Monitoring of known populations of significant <i>Tecticornia</i> species identified in Schedule 1 is carried out by suitably qualified personnel.	CAR	Overall	Life of proposal	Not required	<p>As per M6.1, APC has not commenced pumping operations, filling of ponds or ground disturbance activities near to any of the identified <i>Tecticornia</i> populations. Therefore, there are no direct or indirect impacts and the environmental objectives of M6.1 are being met.</p> <p>APC has erected signage at <i>Tecticornia</i> locations near WB14 (proximal to <i>Tecticornia</i> <i>sp. Sterile 1</i>) and conducted a visual examination of the plants and surrounding area to ensure there has been no disturbance.</p> <p>A specialist botanical group has been identified and will train local personnel to enable routine monthly monitoring to be conducted. This will commence in mid 2022.</p>
1162:M6.3	Flora and Vegetation – Significant <i>Tecticornia</i> Species	<p>The proponent shall, within two (2) years of this Statement being issued, or in accordance with a schedule approved by the CEO by notice in writing:</p> <ol style="list-style-type: none"> undertake additional survey and/or taxonomic work to clarify the conservation status of <i>Tecticornia</i> <i>aff. undulata</i> and <i>Tecticornia</i> <i>sp. Sterile 1</i>; and provide a report to the CEO demonstrating that the requirements of condition 6-3(1) have been met. 	Undertake additional surveys to clarify conservation of <i>Tecticornia</i> species and provide report demonstrating conditions 6-3(1) have been met.	Written report to CEO	Within two (2) years of MS1162 being issued.	By 31 January 2023 or in accordance with schedule approved by CEO.	Not required	A specialist environmental/botanical consultancy has provided a proposal to undertake these works, which will nominally occur during the flowering period (Oct-Nov) of calendar year 2022. A survey of the species was conducted by the same consulting Botanists in April 2019 and a report provided.
1162:M6.4	Flora and Vegetation – Significant <i>Tecticornia</i> Species	The proponent shall carry out the monitoring required by condition 6-2 monthly, or in accordance with a schedule of monitoring or any subsequent revisions of the schedule of monitoring that the CEO has confirmed by notice in writing is adequate to verify that the outcomes of condition 6-1 have been met.	<p>Undertake monitoring of known populations of significant <i>Tecticornia</i> species identified in Schedule 1 of MS1162 by suitably qualified personnel.</p> <p>Monitoring to include observations of population extent and plant health, and signs of direct or indirect impacts.</p>	CAR Written letter from CEO	Overall	Monthly	Not required	Refer to M6.1 and M6.2.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1162:M6.5	Flora and Vegetation – Significant <i>Tecticornia</i> Species	The proponent shall continue to implement the monitoring required by condition 6-2 until the CEO has confirmed by notice in writing that the outcomes specified in condition 6-1 have been met.	Ongoing monitoring of known populations of significant <i>Tecticornia</i> species identified in Schedule 1 of MS1162 by suitably qualified personnel.	CAR Written letter from CEO	Overall	Monthly	Not required	Refer to M6.1 and M6.2.
1162:M6.6	Flora and Vegetation – Significant <i>Tecticornia</i> Species	If monitoring required by condition 6-2 indicates that the outcomes of condition 6-1 may not be met, the proponent shall notify the CEO within seven (7) days of the potential non-compliance being identified and implement management measures to mitigate any impacts in consultation with the Department of Water and Environmental Regulation (DWER).	If results from monitoring identify potential non-compliance of no direct or indirect impact to significant <i>Tecticornia</i> species identified in Schedule 1, advise CEO in writing. APC to consult with DWER regarding mitigation measures to be implemented.	Written letter to CEO CAR. Copies of correspondence to and from DWER.	Overall	Within seven (7) days of identification of potential non-compliance	Not required	Refer to M6.1 and M6.2.
1162:M6.7	Flora and Vegetation – Significant <i>Tecticornia</i> Species	The proponent shall include the results of monitoring carried out in accordance with condition 6-2, and the details of management measures carried out in accordance with condition 6-6, in the Compliance Assessment Report required by condition 4-6.	Monitoring results and management measures to be included in the CAR.	CAR	Overall	Annually	Not required	Refer to M6.1 and M6.2.
1162:M7.1	Terrestrial Fauna	The proponent shall implement the proposal to meet the following environmental objective: 1. Avoid, where possible, otherwise minimise direct and indirect impacts to significant terrestrial fauna species, including but not limited to the night parrot and great desert skink.	Implementation of APC's <i>Fauna Management Plan - Lake Wells Potash Project</i> .	CAR	Overall	Life of proposal	Compliant	APC implemented the <i>Fauna Management Plan - Lake Wells Potash Project</i> during the compliance period. The EMP has been developed to avoid impacts to the fauna of conservation significance as stated. No ground disturbing activities have occurred in any of the regions near to the identified habitats of these fauna. Refer to Attachment B for implementation status of the EMP.
1162:M7.2	Terrestrial Fauna	In order to meet the requirement of condition 7-1, the proponent shall implement the <i>Fauna Management Plan - Lake Wells Potash Project</i> (18 August 2020), or any subsequent revisions as approved by the CEO.	Implementation of the latest version of APC's <i>Fauna Management Plan - Lake Wells Potash Project</i> .	CAR	Overall	Life of proposal	Compliant	APC implemented the <i>Fauna Management Plan - Lake Wells Potash Project</i> during the compliance period. There were no revisions proposed or requested during the compliance period. Refer to Attachment B for implementation status of the EMP.
1162:M7.3	Terrestrial Fauna	The proponent shall continue to implement the <i>Fauna Management Plan - Lake Wells Potash Project</i> (18 August 2020) or any subsequent revisions as approved by the CEO, until the CEO has confirmed by notice in writing that the objective specified in condition 7-1 has been met.	Adherence to the latest version of APC's <i>Fauna Management Plan - Lake Wells Potash Project</i> until CEO advises condition 7-1 has been met by APC.	CAR Written notification from CEO of requirements under the <i>Fauna Management Plan - Lake Wells Potash Project</i> .	Overall	Life of proposal unless written notice from CEO provided.	Compliant	APC implemented the <i>Fauna Management Plan - Lake Wells Potash Project</i> during the compliance period. APC has not received any notice that M7.1 has been met during the compliance period. APC continues to implement the plan.
1162:M7.4	Terrestrial Fauna	The proponent may review and revise the <i>Fauna Management Plan - Lake Wells Potash Project</i> (18 August 2020) or any subsequent revisions as approved by the CEO.	APC's <i>Fauna Management Plan - Lake Wells Potash Project</i> reviewed by APC as approved by the CEO.	Written letter from CEO approving revision to be undertaken. Written letter to the CEO which includes a revised <i>Fauna Management Plan - Lake Wells Potash Project</i> .	Overall	Life of proposal	Compliant	No revision in the current compliance year has been requested by APC.
1162:M7.5	Terrestrial Fauna	The proponent shall review and revise the <i>Fauna Management Plan - Lake Wells Potash Project</i> (18 August 2020) as and when directed by the CEO.	As when directed by the CEO, APC will review and revise the <i>Fauna Management Plan - Lake Wells Potash Project</i> .	Written directive from CEO. Written letter to the CEO which includes a revised <i>Fauna Management Plan - Lake Wells Potash Project</i> .	Overall	Life of proposal as and when directed by the CEO.	Compliant	APC has not been instructed to revise the <i>Fauna Management Plan - Lake Wells Potash Project</i> in the current compliance year.
1162:M8.1	Inland Waters and Subterranean Fauna	The proponent shall implement the proposal to meet the following environmental objectives: 1. avoid, where possible, otherwise minimise impacts to groundwater levels and groundwater quality outside the on-playa development envelope shown in Figure 1 and described in Schedule 2; and 2. avoid, where possible, otherwise minimise impacts to stygofauna habitat.	Implement the latest version of APC's <i>Groundwater Monitoring Strategy - Lake Wells Potash Project</i> .	CAR	Overall	Life of proposal	Compliant	The <i>Groundwater Monitoring Strategy - Lake Wells Potash Project</i> has been implemented in the compliance year to the extent required to achieve the environmental objectives. As per Section 2.2 of the approved <i>Groundwater Monitoring Strategy - Lake Wells Potash Project</i> : Quarterly monitoring will continue, with additional data collected prior to project implementation (i.e. prior to early 2021 at the earliest) added to the baseline dataset. The baseline dataset at the time of project implementation (brine and/or process/potable water extraction) will be used in the assessment of post-implementation data. APC has completed collection of additional baseline data around groundwater levels and quality to assist in managing impacts, once abstraction commences. The environmental objectives are currently being achieved as there has been no substantive commencement of abstraction of playa brine or raw/process water in the compliance year.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1162:M8.2	Inland Waters and Subterranean Fauna	In order to meet the objectives of condition 8-1, the proponent shall implement the <i>Groundwater Monitoring Strategy – Lake Wells Potash Project</i> (20 August 2020), or any subsequent revisions as approved by the CEO.	Implement the latest version of APC's <i>Groundwater Monitoring Strategy – Lake Wells Potash Project</i> .	CAR	Overall	Life of proposal	Compliant	Refer to M8.1.
1162:M8.3	Inland Waters and Subterranean Fauna	The proponent shall continue to implement the <i>Groundwater Monitoring Strategy - Lake Wells Potash Project</i> (20 August 2020) or any subsequent revisions as approved by the CEO, until the CEO has confirmed by notice in writing that the objective specified in condition 8-1 has been met.	Implement the latest version of APC's <i>Groundwater Monitoring Strategy - Lake Wells Potash Project</i> until advised in writing by CEO that condition 8-1 has been met.	CAR Written notice from CEO the objective under condition 8-1 has been met.	Overall	Life of proposal	Compliant	APC have implemented the <i>Groundwater Monitoring Strategy</i> during the reporting period and has not received notification from the CEO that the objectives of Condition 8-1 have been met. APC will continue to implement the strategy until such time.
1162:M8.4	Inland Waters and Subterranean Fauna	The proponent shall submit a revised <i>Groundwater Monitoring Strategy</i> within fifteen (15) months of the commencement of operations that analyses the results of the first twelve (12) months of monitoring during operations to demonstrate that the requirements of condition 8-1 can be met.	Analysis of results of first 12 months of Groundwater Monitoring which is to be used to revise APC's <i>Groundwater Monitoring Strategy</i> .	CAR Written letter to the CEO which includes a revised <i>Groundwater Monitoring Strategy</i> .	Operations	Within 15 months of commencement of operations	Not required	Operations have not yet commenced.
1162:M8.5	Inland Waters and Subterranean Fauna	The proponent may review and revise the <i>Groundwater Monitoring Strategy - Lake Wells Potash Project</i> (20 August 2020) or any subsequent revisions as approved by the CEO.	If decided by APC, review and revise the <i>Groundwater Monitoring Strategy - Lake Wells Potash Project</i>	CAR Written letter to the CEO which includes a revised <i>Groundwater Monitoring Strategy</i> .	Overall	Life of proposal	Compliant	APC submitted a revised <i>Groundwater Monitoring Strategy – Lake Wells Potash Project</i> as part of the proposed Section 45C amendments. The S45C approval was granted at the end of the compliance year and the revised <i>Groundwater Monitoring Strategy</i> is not considered relevant for the present compliance year.
1162:M8.6	Inland Waters and Subterranean Fauna	The proponent shall review and revise the <i>Groundwater Monitoring Strategy - Lake Wells Potash Project</i> (20 August 2020) as and when directed by the CEO.	Written direction from CEO. Review and revise <i>Groundwater Monitoring Strategy - Lake Wells Potash Project</i> .	CAR Written direction from CEO. Written letter to the CEO which includes a revised <i>Groundwater Monitoring Strategy</i> .	Overall	Life of proposal	Not required	APC was not directed by the CEO to review and amend the <i>Groundwater Monitoring Strategy - Lake Wells Potash Project</i> strategy during the reporting period.
1162:M9.1	Cultural Heritage Management	The proponent shall implement the proposal to meet the following environmental objective: avoid where possible and minimise impacts to heritage sites and cultural values.	Implement the requirements of the Cultural Heritage Management Plan.	CAR	Overall	Life of proposal	Compliant	APC manages this via anthropological and archaeological surveys and in line with our legislative obligations to protect and preserve any sites that are identified during the course of these surveys. All surveys have been conducted with suitably qualified Anthropologists/Archaeologists in conjunction with Traditional Owner(s) with connection to country. This objective is being achieved through the implementation of the CHMP.
1162:M9.2	Cultural Heritage Management	To ensure that the objective of condition 9-1 is met, the proponent shall prepare a Cultural Heritage Management Plan. The Plan shall include: 1. the methodology and scope of pre-clearance surveys to be conducted prior to disturbance in areas identified to be at high risk of including heritage sites or other cultural values; 2. management actions to be undertaken where sites or cultural values are identified, to meet the objective of condition 9-1(1); 3. a framework for consultation with relevant stakeholders during the life of the proposal, including the timing of consultation relative to the stages of the project, the form of consultation for each stage identified, information to be provided before and during consultation, including spatial data and maps, and actions to be implemented in the event that consultation cannot be conducted due to the inability to schedule consultation events. In the event that all attempts to schedule consultation are unsuccessful, the proponent must continue to implement the plan; and 4. contingency actions to be implemented in the event that management actions required by condition 9-2(2) have not been implemented, including but not limited to consultation with relevant agencies.	Prepare a Cultural Heritage Management Plan that includes the methodology of pre-clearance surveys, management actions for identified sites, framework for consultation with stakeholders and contingency actions which includes consultation with relevant agencies.	Copy of CHMP	Overall	Life of proposal	Completed	The CEO approved CHMP on 26 July 2021.
1162:M9.3	Cultural Heritage Management	The Cultural Heritage Management Plan shall be reviewed by an independent person determined by the CEO on advice of the appropriate knowledge- holders and the proponent.	Provide CHMP to suitably qualified independent consultant to review Plan as determined by the CEO.	Report by reviewer of CHMP.	Pre-operation	By June 2021	Completed	A review was completed by Gavin Jackson Cultural Resource Management in May 2021.
1162:M9.4	Cultural Heritage Management	The Cultural Heritage Management Plan shall be approved by notice in writing from the CEO prior to the commencement of operation.	Approved CHMP prior to commencement of operation.	Written letter from CEO.	Pre-operation	Prior to commencement of operation.	Completed	CEO approved CHMP on 26 July 2021

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1162:M9.5	Cultural Heritage Management	The proponent shall implement the approved Cultural Heritage Management Plan, or the most recent version, which the CEO has confirmed by notice in writing satisfies the requirements of condition 9-2.	Implement CHMP, or most recent version that the CEO confirms meets the requirements of condition 9-2.	Written letter from CEO confirming CHMP satisfies MS requirements. CAR.	Pre-operation	As soon as CHMP has been approved.	Compliant	The approved Cultural Heritage Management Plan (CHMP) has been implemented in accordance with requirements of this condition. An assessment of the management targets contained in the CHMP is provided as further information in Attachment C.
1162:M9.6	Cultural Heritage Management	The proponent may review and revise the Cultural Heritage Management Plan or any subsequent revisions as approved by the CEO.	APC to seek approval from CEO prior to review and revision of CHMP.	Written letter of approval from CEO. CAR Written letter to CEO providing revised CHMP.	Overall	Life of proposal	Compliant	APC has not requested to review or revise the Cultural Heritage Management Plan following approval.
1162:M9.7	Cultural Heritage Management	The proponent shall review and revise the Cultural Heritage Management Plan as and when directed by the CEO by notice in writing.	APC to review and revise CHMP when directed by the CEO in writing.	Written direction from CEO. CAR Written letter to CEO providing revised CHMP as directed.	Overall	Life of proposal	Compliant	APC has not received any instruction to review or revise the CHMP following its' initial acceptance.
1162:M9.8	Cultural Heritage Management	The proponent shall continue to implement the approved Cultural Heritage Management Plan, or any subsequently approved revisions, until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 9-1 is being and will continue to be met.	Implementation of most current version of CHMP until advised in writing by CEO that 1162:M9.1 has been and continues to be met.	Written letter from CEO providing direction on implementation of CHMP.	Overall	Life of proposal	Compliant	Implementation of the CHMP remains current as of 21/05/2021.. Implementation against the CHMP requirements is assessed at Attachment C There have been no revisions of the document given that our processes are currently compliant with the obligations set out in the approved version.
1162:M9.9	Cultural Heritage Management	In the event of failure to implement management actions detailed in the approved Cultural Heritage Management Plan, the proponent shall notify the CEO in writing within seven (7) days of the non-compliance being identified and shall immediately implement the contingency actions described in the plan as required by condition 9-2(4).	Notify the CEO of any non-compliance with the CHMP. Implement contingency actions in CHMP following a non-compliance.	Written letter to CEO of any non-compliance. Written letter to CEO advising of contingency actions undertaken.	Overall	Within 7 days of any non-compliance	Compliant	There have been no failures to implement actions/compliance issues or contingency actions as part of the CHMP.

**Attachment C: Compliance status for Fauna Management Plan, Groundwater Monitoring Strategy and Cultural Heritage Management Plan
Lake Wells Sulphate of Potash**

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- This audit table is a summary of the requirements contained in the corresponding management plan referred to in MS 1162.
- Code prefixes: M = Minister’s condition, P = Proponent’s commitment, N = Procedure.
- Abbreviations: CAR = Compliance Assessment Report; CEO = Chief Executive Officer of OEPA; Minister for Env = Minister for the Environment; OEPA = Office of the Environmental Protection Authority.
- Compliance Status: C = Compliant, CLD = Completed, NC = Non – compliant, NR = Not Required at this stage. Please note the terms NA = Not Audited and VR = Verification Required are only for OEPA use. IP = In Process may only be used by the proponent in circumstances outlined in Section 2.8 of the *Post Assessment Guideline for Preparing an Audit Table*.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
Fauna Management Plan – Lake Wells Potash Project (18 August 2020)								
1162:P1	Fauna Management Plan Commitments - Clearing	No loss of Great Desert Skink and/or Brush-tailed Mulgara burrows due to land clearing activities (adjacent to access road).	<ul style="list-style-type: none"> • Pre-clearing surveys (Great Desert Skink, Brush-tailed Mulgara) • Mapping of active burrows and designation/demarcation as ‘no go’ areas prior to clearing • Fauna spotter present during land clearing activities 	Survey reports in the CAR	Construction	Survey within 1 month of clearing	Compliant	<p>APC has a requirement to survey prior to clearing in certain specified areas. There has been no clearing near to the specified areas (access road) in the compliance period and therefore no surveys have been conducted.</p> <p>Site access predominantly utilised the existing Lake Wells Road in an unaltered format.</p> <p>APC has identified these areas in their GIS system</p> <p>APC has conducted clearing in compliance with internal clearing permit requirements.</p>
1162:P2	Fauna Management Plan Commitments - Clearing	No clearing outside of approved clearing areas.	Clearing in accordance with internal clearing Permit requirements	<p>Survey data and aerial imagery</p> <p>Clearing register</p> <p>Annual report</p>	Construction	Ongoing	Compliant	APC has conducted clearing in compliance with internal clearing permit requirements.
1162:P3	Fauna Management Plan Commitments - Clearing	Vegetation returns consistent with approved MCP closure criteria.	Rehabilitation of temporary cleared areas	Vegetation cover and quality (e.g. species diversity, % cover, weed cover)	Construction	Biannual (spring and autumn)	Compliant	All currently cleared areas are active and there has been no requirement to rehabilitate any areas as yet.
1162:P4	Fauna Management Plan Commitments – Vehicle Strikes	No impact to Great Desert Skink burrows (adjacent to access road).	<p>Speed limits implemented for Project areas with a maximum of 60 km applied to travel on the Access Road.</p> <ul style="list-style-type: none"> • Vehicle movements along the access road will occur during daylight hours only (except for emergency vehicles). • Off road driving will not be permitted by any APC personnel or contractors unless occurring within the Project footprint and prior to the development of access tracks. 	<p>Targeted surveys</p> <p>Internal Incident Reports</p> <p>Annual assessments, following Project implementation, of the mapped populations.</p>	Operations	<p>Ongoing</p> <p>Annual assessments</p>	Not required	The Project is not in the operations phase. Speed limits have been applied around the site and access is restricted to existing established paths.
1162:P5	Fauna Management Plan Commitments – Vehicle Strikes	No loss of Great Desert Skink, Brush-tailed Mulgara and/or Night Parrot due to vehicle strike	Operations phase observations and records of fauna mortality due to vehicle strike.	Fauna observations, injury or mortality events.	Operations	Ongoing	Not required	The project is not in the operations phase. APC records environmental incidents using an incident management system maintained by the lead engineer (GRES).
1162:P6	Fauna Management Plan Commitments – Feral Animals	<ul style="list-style-type: none"> • All feral animal attractants (e.g. uncovered waste and water sources) fenced to minimise accessibility to feral animals • Feral animal control programs implemented for attractant areas in response to monitoring results. • Reduced observations of feral animals recorded within three months of implementation of control programs. 	<ul style="list-style-type: none"> • Fence domestic waste facilities within Off Playa Development Envelope • Project borrow pits constructed and rehabilitated to minimise permanent water holding ability • Operations phase feral animal monitoring • Predator control program implemented within the Development Envelopes in response to results of project specific monitoring. 	<ul style="list-style-type: none"> • Monthly deployment of camera traps for not less than 5 nights, following Project implementation, until closure phase. • Ongoing opportunistic observations. 	Operations	<p>Monthly</p> <p>Ongoing</p>	Not required	<p>The project is not in the operations phase. However, APC has commenced camera trap monitoring using motion activated cameras in the specified locations to gather baseline data.</p> <p>Due to the low number of personnel in the village during the compliance year, the old exploration rubbish tip continued to be used. A new tip will be established that will be fenced as personnel numbers increase.</p>
1162:P7	Fauna Management Plan Commitments - Fire	No impacts to native vegetation as a result of Project-related fire	<ul style="list-style-type: none"> • Firefighting equipment will be maintained within light vehicles, earth moving equipment and buildings. • Fire breaks will be installed, as required, to manage the risk to people and infrastructure. • Management procedures including hot work permits will be applied to minimise the risk of accidental fire. 	Internal Incident Reports	Operations	Ongoing	Not required	<p>The project is not in the operations phase. APC did not record any Project related fire events during the compliance period.</p> <p>During the compliance period (24/11/2021) DMIRS conducted a site inspection (SV-105-433298) which included inspection of fire fighting resources. As a result of the inspection the fire break around the diesel fuel tank was increased.</p> <p>APC has fire breaks around buildings and other infrastructure.</p> <p>A water cart is available onsite for fire fighting and/or an IBC trash pump/hose reeler arrangement. Fire extinguishers are present in</p>

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								vehicles and infrastructure. A DFES bushfire management plan has been registered and a contact process established with the nearest neighbouring operation, Regis Resources, for additional fire fighting support if required.
1162:P8	Fauna Management Plan Commitments - General	No loss of known Great Desert Skink burrows due to Project impacts (fire, land clearing, vehicle strike)	Operations phase surveys to monitor Great Desert Skink burrow locations in relation to infrastructure.	Surveys	Operations	Ongoing	Not required	The Project is not in the operations phase. APC has not conducted any surveys to monitor Great Desert Skink burrow locations.
Groundwater Monitoring Strategy¹ (20 August 2020)								
1162:P9	Brine abstraction	Groundwater abstraction volumes within limit (17 GL/annum)	Monitoring of abstraction volumes	Annual reporting of groundwater monitoring program within CAR. Reporting within 5C licences	Operations	Monthly during operations	Not required	The <i>Groundwater Monitoring Strategy – Lake Wells Potash Project</i> has been implemented in the compliance year to the extent required to achieve the environmental objectives. As per Section 2.2 of the approved <i>Groundwater Monitoring Strategy – Lake Wells Potash Project</i> : Quarterly monitoring will continue, with additional data collected prior to project implementation (i.e. prior to early 2021 at the earliest) added to the baseline dataset. The baseline dataset at the time of project implementation (brine and/or process/potable water extraction) will be used in the assessment of post-implementation data. APC has completed collection of additional baseline data around groundwater levels and quality to assist it in managing impacts, once abstraction commences. The environmental objectives are currently being achieved as there has been no substantive commencement of abstraction of playa brine or raw/process water in the compliance year.
1162:P10	Brine abstraction	No significant increases in salinity in Off-Playa bores.	Monitoring to ensure salinity at individual bore(s) is not ≥20% greater than highest baseline salinity value from same season.	Annual reporting of groundwater monitoring program within CAR.	Operations	Monthly during operations	Not required	Refer to 1162:P9
1162:P11	Brine abstraction	No significant decrease in groundwater level in Off-Playa bores.	Monitoring of groundwater level (field)	Annual reporting of groundwater monitoring program within CAR. Reporting trigger exceedances to the CEO of DWER within 21 days of the trigger exceedance becoming known.	Operations	Monthly during operations	Not required	Refer to 1162:P9
1162:P12	Process/potable water abstraction	Groundwater abstraction volumes within limit (0.8 GL/annum)	Monitoring of abstraction volumes	Annual reporting of groundwater monitoring program within CAR. Reporting within 5C licences	Operations	Monthly during operations	Not required	Refer to 1162:P9
1162:P13	Process/potable water abstraction	No significant increases in salinity in Off-Playa bores.	Monitoring to ensure salinity at individual bore(s) is not ≥20% greater than highest baseline salinity value from same season.	Annual reporting of groundwater monitoring program within CAR. Reporting trigger exceedances to the CEO of DWER within 21 days of the trigger exceedance becoming known.	Operations	Monthly during operations	Not required	Refer to 1162:P9
1162:P14	Process/potable water abstraction	No significant decrease in groundwater level in Off-Playa bores.	Monitoring of groundwater level (field)	Annual reporting of groundwater monitoring program within CAR. Reporting trigger exceedances to the CEO of DWER within 21 days of the trigger exceedance becoming known.	Operations	Monthly during operations	Not required	Refer to 1162:P9
1162:P15	Station bores	No significant increases in salinity in Off-Playa bores.	Monitoring to ensure salinity at individual bore(s) is not ≥20% greater than highest baseline salinity value from same season.	Annual reporting of groundwater monitoring program within CAR. Monthly reporting to station owner.	Operations	Monthly during operations	Not required	Refer to 1162:P9

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1162:P16	Station bores	No significant decrease in groundwater level in Off-Playa bores.	Monitoring of groundwater level (field)	Annual reporting of groundwater monitoring program within CAR. Monthly reporting to station owner.	Operations	Monthly during operations	Not required	Refer to 1162:P9
Cultural Heritage Management Plan (26 May 2021)								
1162:P17	Cultural Heritage Management Plan Commitments - Induction	Require all employees and contractors to complete an Aboriginal Heritage & Cultural Awareness Induction before working within the PDE.	Inspection of completed records of Employee and Contractor Site inductions signed by employees/contractors and supervisor/OHS&E manager as recorded in the Training Register to determine if Management target is being met.	Report of inspection of Training Register to be a component of monthly management reporting to APL management.	Overall	Monthly during construction, quarterly thereafter	Compliant	Slides 37-39 of the general site induction cover Aboriginal Heritage & Cultural Awareness. Individual names and completion records of site inductions are held with the lead engineer, GRES. Induction statistics are reported as part of the monthly safety statistics.
1162:P18	Cultural Heritage Management Plan Commitments - Heritage Information System	Maintain on-site heritage information system	GIS Department Supervisor to inspect on-site heritage information system to determine if Management target is being met.	GIS Department Supervisor to report monthly • whether Management target is being met; • summary of on-site heritage information system.	Overall	Monthly	Compliant	The heritage information system is maintained through the use of an online GIS tool, which is replicated in the field through the use of tablets. In addition to this there are printed maps contained key information. A summary of heritage related information is contained in the monthly management report, updates are made as and when additional information becomes available. The management target is being met through this review process.
1162:P19	Cultural Heritage Management Plan Commitments - Ground Disturbance	No new ground disturbing work on PDE if (1) proposed work is on High Risk Heritage Site (HRHS) Area; and (2) Pre-Clearance Archaeological Survey required	Inspect HRHS Areas to identify any unauthorised ground disturbance • Check Ground Disturbance Permit register for regularity of Ground Disturbance Permits	Reporting of number and validity of pre-clearance proposal forms to be a component of monthly reporting to APL management	Overall	Weekly during construction; monthly following construction	Compliant	There has been no work conducted in HRHS areas. APC has undertaken an additional pre-clearance archaeological survey, subsequent to the end of the current compliance period, in March 2022, as part of planning and to examine a potential HRHS area.. There are currently no HRHS areas contained in the project development envelope (PDE).
1162:P20	Cultural Heritage Management Plan Commitments - Ground Disturbance	Undertake pre-Clearance Archaeological Survey, if required	Inspect Ground Disturbance Permits to determine if Management target is being met	Reporting of summary of Ground Disturbance Permits and Pre-Clearance Archaeological Surveys to be a component of monthly reporting to APL management.	Overall	Monthly	Compliant	There have been 6 ground disturbance permits issued and approved by the APC CEO/MD. All these permits are compliant with the Archaeological Survey requirements (legislative and CHMP based obligations). Evidence in Ground disturbance permits process and monthly management reports.
1162:P21	Cultural Heritage Management Plan Commitments - Ground Disturbance	No disturbance to identified heritage sites (unless authorised APC CEO or authorised delegate).	Civils Manager to inspect identified heritage sites for demarcation and unauthorised disturbance.	Reporting of review of registers and field inspections of demarcated areas to be provided to APC CEO monthly by Construction Manager.	Overall	Weekly during construction, monthly following construction	Compliant	There have been no heritage sites identified that have been authorised to be disturbed. APC adopts a policy of avoidance.
1162:P22	Cultural Heritage Management Plan Commitments - Ground Disturbance	Undertake review of pre-clearance archaeological survey reports	Heritage Department Supervisor to inspect GIS database and on-site heritage information to determine whether Management target is being met;	Heritage Department Supervisor to report monthly to APC management: whether Management target is being met; summary of review of pre-clearance archaeological surveys reports	Overall	Monthly	Compliant	Archaeological survey reports are reviewed and the results integrated into the GIS system. A summary of reviews is contained in the monthly management report which has determined this target is being met.
1162:P23	Cultural Heritage Management Plan Commitments - General	Comply with Ministerial Consent conditions under s18 of the AH Act	Nil (No Ministerial Consent conditions)	Nil (No Ministerial Consent conditions)	Overall	N/A	Not required	Not required – No Ministerial Consent Conditions apply.
1162:P24	Cultural Heritage Management Plan Commitments - General	No denial of access to heritage sites or places of cultural value (unless unavoidable).	Heritage Department Supervisor to inspect any access areas to determine whether Management target is being met	Heritage Department Supervisor to report monthly to APC CEO whether Management target is being met. Summary of access details	Overall	As and when received	Compliant	APC has not denied access to any heritage sites or places.

¹ Note: The Groundwater Operating Strategy used for the purposes of assessing compliance 1 February 2020 to 31 January 2021 in this Compliance Assessment Report is the Version August 2020. A revised Groundwater Operating Strategy was submitted as part of the Section 45C referral and is considered to have come into effect at the same time as the granting of the S45C (being 25 January 2022). Due to the relatively immaterial differences between the plans and short time period that the February 2021 plan covers, this assessment is based on the August 2020 plan.