



REPORT COMPLIANCE ASSESSMENT REPORT - SPOTTED QUOLL MINE

DATE: 30 SEPTEMBER 2024



DATE	NAME	CHANGE	APPROVED	REVISION
17 Sept 2024	Amy Linkert	Draft		Rev A
17 Sept 2024	Ashleigh Farquharson	Transfer to template		Rev B
19 Sept 2024	Bryan Williams	Final	BW	Rev 1



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1. COMPLIANCE ASSESSMENT REPORT (CAR)

As per Condition 4-6 of MS808 for the Spotted Quoll Mine:

The proponent shall submit a compliance assessment report annually from the date of issue of this Implementation Statement addressing the previous twelve-month period or other period as agreed by the Chief Executive Officer of the Department of Environment and Conservation. The compliance assessment report shall:

- Be endorsed by the proponent's Managing Director or a person, approved in writing by the Department of Environment and Conservation, delegated to sign on the Managing Director'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.
- Indicate any proposed changes to the compliance assessment plan required by condition 4-1.

2. ENDORSEMENT OF CAR

This CAR is endorsed by the proponent's Managing Director or a person, approved in writing by the Department of Environment and Conservation, delegated to sign on the Managing Director's behalf.

Name: Bryan Williams

Position: Head of Environment and Climate

Date: 19/09/2024

Signature:

A handwritten signature in blue ink, appearing to read 'B Williams', written over a light blue horizontal line.

3. COMPLIANCE STATEMENT

IGO has met compliance with all conditions of MS808 and MS822 during the annual reporting period (1 July 2023 to 30 June 2024).



4. POTENTIAL NON-COMPLIANCES AND CORRECTIVE ACTIONS

IGO has made compliance statements to each condition of MS808 and MS822 within Table 1.

Table 1 – Compliance Statement MS808 and MS822

Group	Item	Condition	Compliance Statement	Corrective Action (if applicable)
Proposal Implementation	1-1	The proponent shall implement the proposal as documented and described in schedule 1 of this statement subject to the conditions and procedures of this statement.	The proposal has been implemented in accordance with all elements described in Schedule 1, as detailed in this 2023-24 Compliance Assessment Report.	
Proponent Nomination and Contact Details	2-1	The proponent for the time being nominated by the Minister for Environment under sections 38(6) or 38(7) of the Environmental Protection Act 1986 is responsible for the implementation of the proposal	In 2022, the Forrestania Operation was acquired by IGOF as part of the acquisition of Western Areas Limited. IGOF remains the proponent responsible for the implementation of the project. Notification was submitted on 5 July 2024, following correspondence with the DWER (EPA Services) that commenced on the 18 June 2024.	
	2-2	The proponent shall notify the Chief Executive Officer of the Department of Environment and Conservation of any change of the name and address of the proponent for the serving of notices or other correspondence within 30 days of such change.	In 2022, the Forrestania Operation was acquired by IGOF as part of the acquisition of Western Areas Limited. IGOF remains the proponent responsible for the implementation of the project. Notification was submitted on 5 July 2024, following correspondence with the DWER (EPA Services) that commenced on the 18 June 2024.	



Group	Item	Condition	Compliance Statement	Corrective Action (if applicable)
Time Limit of Authorisation	3-1	The authorisation to implement the proposal provided for in this statement shall lapse and be void five years after the date of this statement if the proposal to which this statement relates is not substantially commenced.	Substantial commencement of the project occurred on the 9 October 2009. A notification letter (Internal Ref. A333984) of substantial works commencement was sent to DWER (EPA Services) on 30 September 2020.	
	3-2	The proponent shall provide the Chief Executive Officer of the Department of Environment and Conservation with written evidence which demonstrates that the proposal has substantially commenced on or before the expiration of five years from the date of this statement	Substantial commencement of the project occurred on the 9 October 2009.	
Compliance Reporting	4-1	The proponent shall prepare and maintain a compliance assessment plan to the satisfaction of the Chief Executive Officer of the Department of Environment and Conservation	A Compliance Assessment Plan (OEP2010/000640-1) was submitted to the CEO and approved in 2010.	
	4-2	The proponent shall submit to the Chief Executive Officer of the Department of Environment and Conservation, the compliance assessment plan required by condition 4-1 at least 6 months prior to the first compliance report required by condition 4-6. The compliance assessment plan shall indicate: 1. the frequency of compliance reporting; 2. the approach and	The CAP, prepared in accordance with the Post Assessment Guideline for Preparing a Compliance Assessment Plan (OEPA, 2012) was approved by the CEO of the DWER (EPA Services) in 2010. (OEP2010/000640-1).	



Group	Item	Condition	Compliance Statement	Corrective Action (if applicable)
		timing of compliance assessments; 3. the retention of compliance assessments; 4. reporting of potential non-compliances and corrective actions taken; 5. the table of contents of compliance reports; and 6. public availability of compliance reports.		
	4-3	The proponent shall assess compliance with conditions in accordance with the compliance assessment plan required by condition 4-1.	Annual Compliance Assessment Reports completed and submitted to the CEO from 2014 onwards. This 2023-24 CAR assesses compliance with the CAP in accordance with the requirements of Condition 4-1.	
	4-4	The proponent shall retain reports of all compliance assessments described in the compliance assessment plan required by condition 4-1 and shall make those reports available when requested by the Chief Executive Officer of the Department of Environment and Conservation.	No requests have been received from the CEO. Compliance Assessment Reports are retained in IGOF's Document Management System and are available to the CEO upon request.	
	4-5	The proponent shall advise the Chief Executive Officer of the Department of Environment and Conservation of any potential non-compliance within two business days of that non-compliance being known.	The requirements of this audit element were not triggered as there were no non-compliances identified for the reporting period.	



Group	Item	Condition	Compliance Statement	Corrective Action (if applicable)
	4-6	The proponent shall submit a compliance assessment report annually from the date of issue of this Implementation Statement addressing the previous twelve month period or other period as agreed by the Chief Executive Officer of the Department of Environment and Conservation. The compliance assessment report shall: 1. be endorsed by the proponent's Managing Director or a person, approved in writing by the Department of Environment and Conservation, delegated to sign on the Managing Director's behalf; 2. include a statement as to whether the proponent has complied with the conditions; 3. identify all potential non-compliances and describe corrective and preventative actions taken; 4. be made publicly available in accordance with the approved compliance assessment plan; and 5. indicate any proposed changes to the compliance assessment plan required by condition 4-1.	IGOF considers the submission of this CAR to be evidence of compliance with condition 4.6. CAR's are uploaded and maintained on IGFO corporate website: (https://www.igo.com.au/site/caring/environment).	
Performance Review and Reporting	5-1	The proponent shall submit to the Chief Executive Officer of the Department of Environment and Conservation, a Performance Review Report at the conclusion of the first year after the start of implementation and then annually, which addresses: 1. the major environmental risks and impacts; the performance objectives, standards and criteria related to	The first Performance Review Report was provided to the CEO of the DWER (EPA Services) in 2011.	



Group	Item	Condition	Compliance Statement	Corrective Action (if applicable)
		<p>these; the success of risk reduction/impact mitigation measures and results of monitoring related to management of the major risks and impacts; 2. the level of progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable; and 3. improvements gained in environmental management which could be applied to this and other similar projects.</p>	<p>Subsequent Performance Review Reports have been submitted to the CEO of the DWER (EPA Services) annually in September.</p>	
Flora and Vegetation	6-1	<p>The proponent shall not cause the loss of the Declared Rare Flora <i>Eucalyptus steedmanii</i> from the implementation of the proposal.</p>	<p>A Steedman's Gum (<i>Eucalyptus steedmanii</i>) Conservation Management Plan (CMP) (v2) was revised and accepted by the DWER (EPA Services) on 22 November 2021.</p>	
			<p>Protective management measures are implemented onsite including clearing controls, dust controls and management of people and vehicular interaction movements.</p>	
			<p>DRF Biannual Internal Memo - <i>Eucalyptus steedmanii</i> Monitoring for the period Q3 & Q4 2023 and Q1 & Q2 2024 (Draft) has continued and based on findings, there are no management actions triggered.</p>	
	6-2	<p>Prior to ground disturbing activities, the proponent shall undertake baseline monitoring of the health and</p>	<p>Baseline monitoring activities including transect/quadrat monitoring were undertaken in</p>	



Group	Item	Condition	Compliance Statement	Corrective Action (if applicable)
		<p>abundance of the Declared Rare Flora <i>Eucalyptus steedmanii</i> populations 2, 3a, 3b, 7 and population 1 (including individuals in close proximity to the haul road and the population fragment to the west of the haul road) identified in Figure 3, schedule 1.</p>	<p>September 2009 prior to ground disturbing activities commencing. A Steedman's Gum (<i>Eucalyptus steedmanii</i>) CMP has been developed and implemented.</p> <p>Monitoring Report on Health and Abundance of the Declared Rare Flora <i>Eucalyptus steedmanii</i> Populations Reporting Period 2023/24. Annual Compliance Assessment Reports; completed and submitted to the CEO from 2011 onwards.</p>	
	6-3	<p>The proponent shall monitor impacts on the health and abundance of the Declared Rare Flora <i>Eucalyptus steedmanii</i> populations as identified in condition 6-2, from activities undertaken in implementing the proposal. This monitoring shall be carried out to the satisfaction of the Chief Executive Officer of the Department of Environment and Conservation.</p>	<p>Annual monitoring of the health and abundance of the Declared Rare Flora <i>Eucalyptus steedmanii</i> has been ongoing since 2009.</p> <p>A Steedman's Gum (<i>Eucalyptus steedmanii</i>) CMP has been developed and implemented.</p> <p>Declared Rare Flora (DRF) Biannual Internal Memo - <i>Eucalyptus steedmanii</i> Monitoring for the period Q3 & Q4 2023 and Q1 and Q2 2024 (Draft).</p> <p>Spotted Quoll Nickel Mine MS 808: Condition 6.4 Monitoring Report on Health and Abundance of the DRF <i>Eucalyptus steedmanni</i> populations, September 2023-24.</p>	



Group	Item	Condition	Compliance Statement	Corrective Action (if applicable)
	6-4	The proponent shall submit annually the results of monitoring required by condition 6-3 to the Chief Executive Officer of the Department of Environment and Conservation.	Spotted Quoll Nickel Mine MS 808: Condition 6.4 Monitoring Report on Health and Abundance of the Declared Rare Flora <i>Eucalyptus steedmannii</i> populations. September 2023-24 (Ref. ID 0095230). Annual Monitoring Report for Declared Rare Flora (DRF) 2023/24. Annual Compliance Assessment Reports; completed and submitted to the CEO from 2011 onwards.	
	6-5	In the event that monitoring required by condition 6-3 indicates a decline in the health or abundance of Declared Rare Flora <i>Eucalyptus steedmannii</i> outside the areas to be cleared: 1. the proponent shall report such findings to the Chief Executive Officer of the Department of Environment and Conservation within 21 days of the decline being identified; 2. provide evidence which allows determination of the cause of the decline; 3. if determined by Chief Executive Officer of the Department of Environment and Conservation to be a result of activities undertaken in implementing the proposal, the proponent shall submit actions to be taken to remediate the decline to the Chief Executive Officer; and 4. the actions to remediate the decline of Declared Rare Flora shall be undertaken upon approval of the	A letter was provided to the CEO on 26/07/2017 regarding potential decline in vegetation health from dieback. The Annual 2023/24 Monitoring Program did not identify any potential decline in the health or abundance of Declared Rare Flora <i>Eucalyptus steedmannii</i> .	



Group	Item	Condition	Compliance Statement	Corrective Action (if applicable)
		Chief Executive Officer of the Department of Environment and Conservation.		
	6-6	The proponent shall make the monitoring reports required by condition 6-5 publicly available in a manner approved by the Chief Executive Officer of the Department of Environment and Conservation.	Reports are uploaded and maintained on IGFO corporate website: (https://www.igo.com.au/site/caring/environment).	
Fauna	7-1	The proponent shall implement measures identified in Chapter 6.3 of the Environmental Protection Statement for the Proposed Spotted Quoll Mine, prepared by Coffey Environments Pty Ltd, Perth, Western Australia (July 2009) to prevent adverse impacts to Malleefowl along the haul road.	A Malleefowl Management Plan Revision 3.1 dated 2022 (Draft) has been developed and implemented. Annual Compliance Assessment Reports; completed and submitted to the CEO from 2011 onwards.	
Mine Closure and Rehabilitation	8-1	Prior to the commencement of ground-disturbing activities, the proponent shall conduct surveys of the proposal area to collect baseline information on the following: 1. pre-mining soil profiles; 2. groundwater levels; 3. surface water flows; 4. vegetation complexes; 5. landscape and landforms; and 6. material characterisation.	Baseline data meeting the requirements of Condition 8-1 was supplied to PIMS in September 2009 prior to ground disturbance activities commencing.	



Group	Item	Condition	Compliance Statement	Corrective Action (if applicable)
	8-2	<p>The proponent shall submit a Rehabilitation and Mine Closure Plan which is to be prepared to the requirements of the CEO of the Office of the Environmental Protection Authority with the advice of other agencies as appropriate within 12 months of the commencement of ground disturbing activities. The Rehabilitation and Mine Closure Plan shall cover: 1. landform design and material characterisation outcomes; 2. rehabilitation completion criteria consistent with Environmental Protection Authority Guidance Statement No. 6 Guidance for the Assessment of Environmental Factors: Rehabilitation of Terrestrial Ecosystems to provide a self-sustaining, functional ecosystem comprising native vegetation of local provenance species; 3. progressive rehabilitation timelines and monitoring against key performance indicators; 4. annual reporting procedures; 5. procedures to review and revise the Rehabilitation and Mine Closure Plan; 6. measures for preventing groundwater contamination outside of the final pit void; and 7. in the event that a pit lake forms, management measures for ensuring the site is inaccessible to fauna identified as being at risk of impact and for protecting the surrounding native vegetation from potential adverse impacts. The management measures are to be</p>	<p>A Rehabilitation and Mine Closure Plan (RMCP) was developed for the FNO and approved by the DEMIRS in 2013, in accordance with the DEMIRS "Guidelines for Preparing Mine Closure Plans guidelines (2016)".</p> <p>There have been various revisions to this plan; including the 1.4 resubmission of the RMCP Rev 1.4, dated September 2021.</p> <p>A revised RMCP is due in September 2024.</p>	



Group	Item	Condition	Compliance Statement	Corrective Action (if applicable)
		practicable and in accordance with best practice mine closure safety and environmental standards.”		
Procedures	N1	The Minister for Environment will determine any dispute between the proponent and the Environmental Protection Authority or the Department of Environment and Conservation over the fulfilment of the requirements of the conditions.	No disputes for the reporting period.	1
	N2	The proponent is required to apply for a Works Approval and Licence for this project under the provisions of Part V of the Environmental Protection Act 1986.	Works Approval 4499-1/2008/1. Expiry Date 27 September 2012. Licence L8041/1990/5. Expiry Date 18 July 2027.	2
	N3	Where a condition lists advisory bodies, it is expected that the proponent will obtain the advice of those listed as part of its compliance reporting to the Department of Environment and Conservation.	No advice required for this reporting period.	



5. PUBLIC AVAILABILITY OF CAR

CAR's relating to Spotted Quoll MS808 are made available on IGO's website. The web address is as follows: <https://www.igo.com.au/site/caring/environment>

6. CHANGES TO COMPLIANCE ASSESSMENT PLAN

There are no proposed changes to the compliance assessment plan for the Spotted Quoll mine under MS808 and MS822.

APPENDIX 1: PERFORMANCE REVIEW REPORT

Appendix 1 sets out to meet Condition 5-1 of MS808 for the Spotted Quoll Mine which states that; the proponent shall submit to the Chief Executive Officer of the Department of Environment and Conservation, a Performance Review Report at the conclusion of the first year after the start of implementation and then annually, which addresses:

- The major environmental risks and impacts; the performance objectives, standards and criteria related to these; the success of risk reduction/impact mitigation measures and results of monitoring related to management of the major risks and impacts.
- The level of progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable.
- Improvements gained in environmental management which could be applied to this and other similar projects.

6.1 Major Environmental Risks and Impacts

The major environmental risks for the Forresteria Nickel Operation (FNO) Spotted Quoll Project are fire and unauthorised vegetation clearing due to the threat on Humans, DRF (*Eucalyptus steedmanii*) and priority species. Fire is managed by having a trained and competent Emergency Response team led by qualified Emergency Service Coordinators. Unauthorised vegetation clearing is managed by robust internal land clearing processes and ensuring correct procedures are regularly communicated site wide. Once land use permits are in place, supervision by the environmental department is carried out and spatial clearing and rehabilitation data is recorded.

6.2 Sound Environmental Performance

FNO has achieved a sound environmental performance in all aspects of high and medium risk pathways. The high and medium risks identified are, environmental weed infestation, dust, greenhouse gas emissions, direct animal mortality, feral animals, hyper-saline water, changes to groundwater hydrology, hydrocarbon and hazardous material spills and inadequate revegetation regeneration. FNO continues to manage these risks by applying industry benchmarking and using best technologies where applicable.

6.3 Environmental Management Improvements

A list of environmental improvements for the Spotted Quoll project were implemented this reporting period; The use of a LiDAR survey of FNO's tenements was completed to increase the knowledge base of current and new malleefowl mounds. The results of the survey will be ground-truthed, and new identified malleefowl mounds will be added to future monitoring. Incorporating a new and innovative camera capture method on all malleefowl mounds was devised by the environmental team. This provides valuable data on malleefowl and feral animal activity on all active malleefowl mounds. A targeted Chuditch Survey by an external contractor was undertaken to increase the FNO knowledge base of the Chuditch population after the 2019/2020 fires. The results of the survey will depict the locations of artificial habitat dens in the next Financial Year. As well as trapping, an external contractor began the use of 1080 and eradicat baiting in the FNO feral animal control strategy. As part of the preparation on the next iteration of the FNO Mine Closure Plan further geochemical characterisation studies were undertaken to identify any Potentially Acid Forming materials to inform the final rehabilitated land form design. Progressive rehabilitation continued, including biennial rehabilitation monitoring program using ground surveys, and where possible remote sensing techniques. These results are used to guide further rehabilitation efforts at the FNO. A waste resource recovery program was broadened, which reduced the amount of polypipe, fire extinguishers, white goods and scrap steel



in the on-site landfill. Furthermore, FNO continues the ongoing maintenance and continual improvement of the EMS in line with the ISO 14001 standard as well as the ongoing review and continuous improvement of key environmental management plans.