

West Musgrave Copper and Nickel Project

Compliance Assessment Report - Ministerial Statement 1188

July 2024

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Rev	Originator	Checked by	Approved by	Signature	Date
0	Danie Richter – Senior Advisor – Environment Systems and Compliance	Shoanne Labowitch – Manager: Environment and Secondary Approvals Elina Vuorenmaa – Approvals Lead: West Musgrave Province	Thomas Lynch – Project Director	Thomas Lynch Thomas Lynch (Jul 13, 2024 06:37 GMT+8)	12 July 2024

Purpose

OZ Minerals Musgrave Operations Pty Ltd (OZ) is progressing the development of the West Musgrave Copper and Nickel Project (WMP). The operator of the WMP is OZ Minerals Musgrave Operations Pty Ltd (ABN 39 640 213 341), and is wholly held by BHP Group Limited, a company listed on the Australian Stock Exchange (ASX) (ASX: BHP).

This Compliance Assessment Report - MS 1188 for the West Musgrave Copper and Nickel Project has exclusively been prepared for submission to the Government of Western Australia's Department of Water and Environment Regulation (DWER).

Forward Looking Statements

This Document includes "forward-looking statements". These statements relate to expectations, beliefs, intentions or strategies regarding the future. These statements are identified by the use of words like "anticipate," "believe," "estimate," "expect," "intend," "may," "plan," "project," "will," "would," "should," "seek," and similar expressions. The forward-looking statements reflect views and assumptions concerning future events as of the date of this Document and are subject to future conditions, and other risks and uncertainties, including but not limited to economic and political conditions and sovereign risk. Any forward-looking statements are subject to various risk factors that could cause the project's actual results to differ materially from the results expressed or anticipated in these statements. Such statements are not guarantees of future performance and involve known and unknown risks, uncertainties, assumptions and other important factors (including the risks set out in this document), many of which are beyond the control of OZ and its directors and management. OZ does not give any assurance that the results, performance or achievements expressed or implied by the forward-looking statements contained in this Document will actually occur and cautions individuals not to place undue reliance on these forward-looking statements. OZ has no intention of updating or revising forward-looking statements, regardless of whether new information, future events or any other factors affect the information, contained in this Document, and which may affect the finding, or projections contained in this document, except where required by law. All sections in this Document should be viewed in the context of the entire Document.

Note On Currency

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1. INTRODUCTION

1.1 Background

OZ Minerals Musgrave Operations Pty Ltd (OZ) is proposing to develop the West Musgrave Copper and Nickel Project, referred to as the West Musgrave Project (WMP) or the project. The operator of the WMP is OZ Minerals Musgrave Operations Pty Ltd (ABN 39 640 213 341), and is wholly owned by BHP Group Limited, a company listed on the Australian Stock Exchange (ASX) (ASX: BHP).

The WMP is located in the West Musgrave Ranges of Western Australia approximately 1,300 km north-east of Perth near the intersection of the borders between Western Australia, South Australia and the Northern Territory. The WMP is within the Ngaanyatjarra Native Title determination, and Class A Reserve No. 17614 (for the Use and Benefit of Aboriginal Inhabitants). The nearest towns include the Indigenous Communities of Jameson (Mantamaru) 26 km north, Blackstone (Papulankutja) 50 km east, and Warburton (Milyirrtjarra) 110 km west of the project (see Figure 1).

The project, with a current expected life of approximately 26 years, will consist of:

- Mining of copper and nickel ore from two open cut mine pits using conventional blast, load and haul methods.
- Placement of mine waste into permanent Waste Rock Dumps (WRDs) and dedicated Tailings Storage Facility (TSF) adjacent to mine pit voids.
- Milling and processing of ore using dry grinding (Vertical Roller Mills (VRM)) and flotation to produce separate copper and nickel concentrates.
- Permanent electric power generation facility using a combination of renewable power infrastructure (solar photovoltaic panels, wind turbines and battery energy storage) supported by thermal (fossil fuel) power generation.
- Development of a process/potable water supply borefield that may include a combination of overland and/or underground pipelines for use during construction and operations.
- Miscellaneous infrastructure, including stormwater management infrastructure (bunds and drains), internal roads
 and service tracks, a dedicated site access road, accommodation village/s (approximately 350 beds during
 operations (Living Hub) and 1,100 during construction (including Construction Village)), aerodrome, wastewater
 treatment, landfill and other supporting infrastructure including offices, warehouses and workshops.
- Concentrate will be transported to Esperance via existing roads and rail networks.

A summary of the key project characteristics is presented in Table 1.



Table 1: Key Project Characteristics

Elements	Location	Proposed Extent Authorised					
Physical Element	Physical Element						
Mine and associated infrastructure	Figure 2	Clearing of up to 4,213.3 ha of native vegetation within a Development Envelope of 21,680 ha.					
Operational Element	Figure 2						
Mining voids	Figure 2	 Below water table mining Nebo pit void to be backfilled above water table post-closure Babel pit void to be a permanent and episodic pit lake post-closure 					
Mineral processing plat (MPP)	Figure 2	 Processing of up to 13.5 million tonnes of metallic ore through: Primary and secondary crushing Grinding Flotation, product and waste circuits Concentrate storage Water storage infrastructure 					
Mining waste (waste rock)	Figure 2	Placement of waste rock into permanent WRDs					
Ore processing waste (tailings)	Figure 2	Disposal of tailings into a TSF and/or Nebo pit void					
Temporary electric power generation facility	Figure 2	Up to 60 MW (instantaneous load requirement) of fossil fuel electricity generation.					
Permanent electric power generation facility	Figure 2	 Up to 60 MW (instantaneous load requirement) of fossil fuel electricity generation. Up to 100 MW of solar photovoltaic electricity generation. Up to 100 MW of wind turbine electricity generation. Up to 100 MW of battery energy storage. 					
Water supply	Figure 2	Abstraction of up to 7.5 GL/a of groundwater from the borefield and through dewatering					



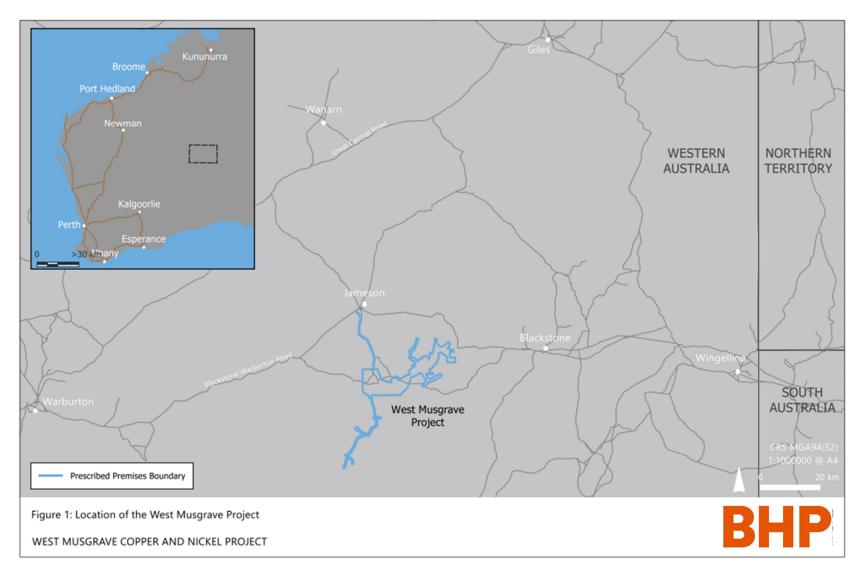


Figure 1: Site Location



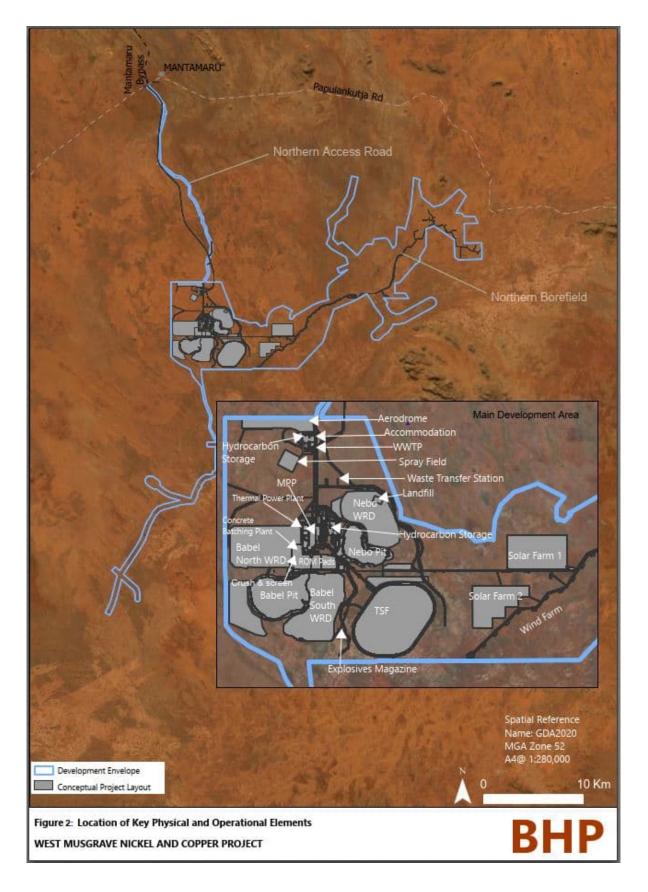


Figure 2: Location of Key Physical and Operational Elements



2. AUDIT PURPOSE AND METHODOLOGY

2.1 Purpose

This report addresses the status and compliance of the West Musgrave Cooper and Nickel Project (WMP) with the conditions outlined in Ministerial Statement 1188 and has been prepared in accordance with the EPA Services Post Assessment Guideline for Preparing a Compliance Assessment Report (August 2012).

Compliance reporting is required under Ministerial Statement 1188 (Condition 10-6). As per requirements of Condition 10-1, a Compliance Assessment Plan (CAP) was submitted to the CEO of DWER on 19 October 2022 and was approved on 18 November 2022. The CAP provides the basis for this assessment. It was noted during the review of the draft CAR that the approved CAP specifies an incorrect reporting period, from 21 March 2023 to 20 March 2024, instead of the appropriate period, being 21 April 2023 to 20 April 2024. A request for amendment of the CAP will be submitted to the Department following submission of this CAR.

This report is therefore the second Compliance Assessment Report (CAR) submitted for the WMP to satisfy Condition 10-6 of Ministerial Statement 1188. It covers the reporting period from 21 March 2023 to 20 April 2024.

2.2 Methodology

An internal audit was undertaken by the West Musgrave Project BHP, Senior Advisor – Environment Systems and Compliance, with assistance from members of the BHP Project and Operations environmental and approvals teams, and the Community team. With respect to the Groundwater Monitoring and Mitigation Plan (GMMP), an independent assessment was provided by EMM to support the findings presented in this CAR.

Key WMP personnel who provided information for the assessment of compliance against each condition and contributed to the preparation of the CAR are:

- BHP WMP Manager Environment and Secondary Approvals (Construction)
- BHP WMP Approvals Lead WM Province.
- BHP WMP Environmental Advisor
- BHP WMP Superintendent: Community and Social Performance.

The methodology consisted of the following steps:

- Compilation of audit tables for MS 1188 and the following management plans:
 - o Cultural Heritage Management Plan (CHMP) Rev3
 - Flora Vegetation Management Plan Rev 1
 - o Groundwater Management and Monitoring Plan Rev 3a
 - Terrestrial Fauna Management Plan Rev 1.
- Verification of the audit tables against the contents of the management plans conducted on a sampling basis and against the requirements of the CAP.
- Preparation of a CAR template and verification against the requirements of the CAP.
- Assessment of each condition of MS 1188 by reviewing available information to support assessments of compliance or non-compliance.



- Recording the finding and the location of the supporting evidence in the audit tables (e.g. on document management system, spatial database, etc).
- Filing of evidence and communications within the BHP document management system for verification and auditing purposes.
- Internal review and clarification of draft findings, including the assessment of additional information, and updating of the audit tables.
- Communication of any detected non-compliances to DWER/EPA via formal email with letter attachment.
- Presentation of draft findings to NgC for their review and comment.
- Incorporation of NgC comments and proposed amendments in the final audit tables, where appropriate and notification to NgC of the responses to their comments.
- Preparation of the summary report and the Statement of Compliance.

On-site audits were conducted as part of the established environmental auditing program in place for WMP. The auditor compiling this compliance report, who is also responsible for the execution of an on-site compliance assessment program, drew on physical verification activities performed during other audits to aid the completion of the assessment. This was supported by the information and evidence provided by the Manager Environment and Secondary approvals, including the provisions of communications, management plans, background information and data to support this compliance assessment. Additional compliance assessment information was obtained from discussions with site environmental advisors, who provided direction to supporting evidence or performed physical checks on behalf of the auditor.



3. IMPLEMENTATION STATUS

During the reporting period, OZ Minerals was acquired by BHP and the WMP project execution (construction) team has transitioned to the BHP Western Australia Major Projects team, who manages a portfolio of large mining development projects.

At the time of writing, the Project is approximately 22% complete. Notable milestones and advances completed during the reporting period include:

- Completion of the majority of the bulk earthworks associated with preparatory works for mineral processing
 plant and non-process infrastructure (notable exclusions being the clearing for mining area (pits and waste
 rock landforms) and the tailings storage facility). As of 20 April 2024, a total of 597.4 ha of clearing had been
 undertaken within the Development Envelope.
- Completion, and CASA certification, of the on-site aerodrome.
- Completion of the construction village (740 persons) and most of the permanent accommodation village structural components (350 persons).
- Substantial progress with the civil components of the Minerals Processing Plant (MPP) and commencement
 of work on major mechanical components such as the Vertical Roller Mills, primary and secondary crushers
 and commencement of dry and wet plant infrastructure.
- Installation of permanent raw and drinking water, sewerage, and electrical services.
- Completion of the permanent wastewater treatment plant and commencement of use of the recycled water for dust suppression.
- Completion of the on-site landfill.
- Substantially progressing investigative work (geohydrological, geotechnical) for the development of major project component such as the Northern Borefield, TSF, solar and wind turbine generator (WTG) locations.
- Ongoing cooperation with the Ngaanyatjarra Council (NgC) regarding infrastructure planning and day-to-day works, such as:
 - Alignment of the Northern Access Road (NAR)
 - o Monitoring during pre-clearing surveys and when new ground disturbance work is performed
 - Early development of pest/feral animal control and seed collection programmes
 - o Consultation regarding the revision of management plans, monitoring activities and monitoring in results, such as for groundwater, dust, fauna management, etc.
- Ongoing cooperation with the NgC to progress community development and local economic development opportunities.



4. AUDIT FINDINGS

The audit assessed compliance over the 12-month reporting period from 21 April 2023 to 20 April 2024. It is the second CAR submitted for the WMP to satisfy Condition 10-6 of Ministerial Statement 1188 and the first CAR where the project was in active construction for the whole of the reporting period. The assessment found that the WMP is compliant with the requirements of MS 1188 in all material respects, and that the implementation of the Project is in accordance with the approved CHMP, FVMP, GMMP, TFMP and Greenhouse Gas Management Plan Rev 3 (GHGMP). Details of the assessment outcomes, including instances of any non-compliance with requirements, are provided in the following sections.

4.1 Ministerial Statement 1188

Details of compliance with MS 1188 are provided in the Audit Table in Appendix 1.

One (1) non-compliance was recorded against Condition M8-1 of Ministerial Statement 1188. It is described below and summarised in Table 2.

4.1.1 Non-compliance with Condition 8-1

Following the acquisition of OZ Minerals by BHP, the name of the proponent remained the same, but the proponent failed to inform the CEO of the change in address. Notification of an administrative non-conformance and the formal change of address was sent to the CEO separately to this CAR on 01 July 2024.

4.2 Management Plans

Four (4) non-compliances with the management measures or commitments contained in the approved management plans endorsed under MS 1188 occurred during the reporting period. The non-compliances are described below and summarised in the respective audit tables.

Conditions 2-3, 3-3, 4-3 and 6-3 of MS 1188 require implementation of the following management plans:

4.2.1 Condition 2-3: Cultural Heritage Management Plan (CHMP)

Assessment outcomes for the approved CHMP are provided in Appendix 2. A single non-compliance with the requirements of the CHMP was recorded during the assessment, however this consequently resulted in a number of non-compliances against specific commitments or management measures detailed in the CHMP.

A breach of the CHMP Golden Rules (#2) on 27 March 2024 involved the following:

An excavator travelled along a non-nominated road outside of the Mining Agreement that passed through an exclusion zone in contravention of the requirements of the Mining Agreement. There was no environmental or heritage damage observed outside of the footprint of the well-formed road, with the excavator and leading light vehicle remaining within the existing formed track at all times. In terms of failed controls that led to the event, the track was previously signposted with 'no-access' signage at both ends; however, signage was missing from the end where access occurred (star pickets still standing in place). Signage for these tracks is installed adjacent to the track (rather than hard barricading) to ensure continued community access to utilise the road(s). The following immediate actions were implemented upon BHP becoming aware of the event:

- Event reported to the CEO of the NgC.
- All regional ground disturbance works and relevant LADPs ceased until audit of signage completed.



- Audit of regional access control signage and rectification of identified deficiencies.
- Escalation process undertaken and full BHP ICAM investigation initiated.
- Initial findings have been communicated to the NgC and the consideration of corrective actions is ongoing in consultation with the NgC.

Notification of this non-conformance was sent to the CEO separately to this CAR on 11 July 2024.

4.2.2 Condition 3-3: Flora and Vegetation Management Plan (FVMP)

Assessment outcomes for the approved FVMP are provided in Appendix 3. No non-compliances with the requirements of the FVMP were recorded during this assessment.

4.2.3 Condition 4-3: Groundwater Monitoring and Management Plan (GMMP)

Assessment outcomes for the approved GMMP are provided in Appendix 4. Two technical non-compliances with the requirements of the GMMP were recorded during this assessment.

GMMP NC 1

Section 2.6.1 of the GMMP specifies "In the event that monitoring, tests, surveys or investigations indicate an exceedance of a threshold criteria, OZ Minerals will report in accordance with the requirements of the relevant Ministerial Statement Condition(s)".

At monitoring bore BMB10-D, results obtained from regular groundwater baseline monitoring at this location returned findings where the measured Electrical Conductivity (EC) was consistently observed (i.e. stable) above the defined trigger values (and intermittently above the threshold value), indicating there is statistical limitations in the baseline range, given that no foreseeable causal effect situated near this bore is noted (due to limited Project related activities). A map indicating the location of the bores in question has been appended to the Statement of Compliance (Appendix 5 of this CAR). The non-compliance was caused by the statistical limitations in the baseline range, given that no foreseeable causal effect situated near this bore is noted (due to limited Project related activities).

The GMMP will be reviewed to address cause and correct baseline for natural and temporal variability in EC

GMMP NC 2

Section 2.6.4 of the GMMP specifies "All reporting discussed in this section will be made specifically available to the Ngaanyatjarra People through the Ngaanyatjarra Council, including where necessary periodic face-to-face meetings to discuss the results and outcomes of monitoring. The Ngaanyatjarra Council will be made aware of any trigger or threshold exceedances within 48 hours of OZ Minerals becoming aware of them".

The below findings where trigger or threshold exceedances were recorded during baseline monitoring activities were not reported to NgC within 48 hours of OZ Minerals (BHP) being aware of the exceedance.

- At BMB10-D, results obtained from regular groundwater baseline monitoring at this location returned findings
 where the measured Electric Conductivity (EC) was consistently observed (i.e. stable) above the defined trigger
 value (and intermittently above the threshold value), indicating there is statistical limitations in the baseline range,
 given that no foreseeable causal effect situated near this bore is noted (due to limited Project related activities).
- During regular groundwater baseline sampling activities, sulphate trigger value exceedances were recorded for four (4) bore locations across the mining area (MMB-01 and MMB-02) and Northern Borefield (BMB-05S and BMB10-S). These exceedances are not inferred to be attributable to the Project, given the limited site activities and are likely a reflection of statistical limitations in the baseline range.

The GMMP will be reviewed to address cause and correct baseline for natural and temporal variability in EC and sulphate.



4.2.4 Condition 6-3: Terrestrial Fauna Management Plan (TFMP)

Assessment outcomes for the approved TFMP are provided in Appendix 5. One non-compliance with the monitoring requirements of the TFMP's objective to "Minimise death or injury to significant fauna as a result of interactions with project-related vehicles or machinery" was identified during the preparation of this CAR. During the reporting period quarterly reviews of records of speed limit non-compliance were not undertaken a specified in the objectives-based EMP. Notification of this non-conformance was sent to the CEO separately to this CAR.

Non-compliances with requirements of the management plans are summarised in Table 2. It is noted that the non-compliances are administrative in nature and have not resulted in environmental harm outside of actions approved by MS1188.

Table 2 -Summary of Audit Non-Compliance Findings

Reference	Condition	Non-compliance Finding
MS 1188, Condition 8-1	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.	The CEO has been notified of the change of address of the proponent.
MS 1188 Condition 6-3 The proponent shall implement the West Musgrave Copper and Nickel Project Terrestrial Fauna Management Plan (Revision 1, September 2021) with the objective of ensuring the environmental outcome of condition 6-1 and the objective of condition 6-2 are achieved. Terrestrial Fauna Management	Monitoring Requirement: Quarterly review of records of speed limit non-compliances.	Quarterly reviews of records of speed limit non-compliances were not undertaken. The CEO has been notified of this non-compliance.
Plan Management Objective: Minimise death or injury to significant fauna as a result of interactions with project-related vehicles or machinery.		
MS 1188 Condition 4-3 The proponent shall implement the latest revision of the Groundwater Monitoring and Management Plan which the CEO has confirmed by	Groundwater Monitoring and Management Plan Section 2.6.1: In the event that monitoring, tests, surveys or investigations indicate an	At BMB10-D, the measured Electric Conductivity (EC) was consistently observed (i.e. stable) above the defined trigger (and intermittently above the threshold value),



Reference	Condition	Non-compliance Finding
notice in writing, addresses the requirements of conditions 4-1 and 4-2.	exceedance of a threshold criteria, OZ Minerals will report in accordance with the requirements of the relevant Ministerial Statement Condition(s).	indicating there is statistical limitations in the baseline range, given that no foreseeable causal effect situated near this bore is noted (due to limited Project related activities).
		The CEO has been notified of this non-compliance.
MS 1188 Condition 4-3 The proponent shall implement the latest revision of the Groundwater Monitoring and Management Plan which the CEO has confirmed by notice in writing, addresses the requirements of conditions 4-1 and 4-2.	Groundwater Monitoring and Management Plan Section 2.6.4: All reporting discussed in this section will be made specifically available to the Ngaanyatjarra People through the Ngaanyatjarra Council, including where necessary periodic face-to-face meetings to discuss the results and outcomes of monitoring. The Ngaanyatjarra Council will be made aware of any trigger or threshold exceedances within 48 hours of OZ Minerals becoming aware of them	The below findings were not reported to NgC within 48 hours of OZ Minerals (BHP) being aware of the exceedance. At BMB10-D, the measured Electric Conductivity (EC) was consistently observed (i.e. stable) above the defined trigger (and intermittently above the threshold value), indicating there is statistical limitations in the baseline range, given that no foreseeable causal effect situated near this bore is noted (due to limited Project related activities). Sulphate trigger value exceedances were recorded in four (4) locations across the mining area (MMB-01 and MMB-02) and Northern Borefield (BMB-05S and BMB10-S) although these exceedances are not inferred to be attributable to the Project, given the limited site activities and are likely a reflection of statistical limitations in the baseline range. The CEO has been notified of this non-compliance.
MS 1188 Condition 2-3 The proponent shall implement the West Musgrave Copper and Nickel Project Cultural Heritage Management Plan (Revision 3, October 2021) with the objective of ensuring that the outcomes of condition 2-1(1) and 2-1(2) and the objectives of condition 2-2(1) and 2-2(2) are achieved.	Cultural Heritage Management Plan The Golden Rule, amongst other management measures, commits BHP not to permit access outside authorised work areas and roads.	A breach of one of the Golden Rules as described under the EPA approved Cultural Heritage Management Plan occurred on 27 March 2024. The failed control that led to the event was that a previously installed 'no-access' sign at the side of the road was missing (star pickets still standing in place). Signage for these tracks is installed adjacent to the track (rather than hard barricading) to ensure continued community access to utilise the road(s) in accordance



Reference	Condition	Non-compliance Finding
		with the commitments of the CHMP and Mining Agreement. After notifying the NgC of the breach, an audit of signage and rectification of deficiencies was performed along with an immediate hold on all works outside of the Central Mining Area while the event could be investigated. A full BHP ICAM investigation has since been initiated and the initial
		findings were communicated to the NgC. The consideration of corrective actions and any community consultation regarding the event is ongoing in consultation with the NgC.
		The CEO has been notified of this non-compliance.



5. OBSERVATIONS

The following observations were made during this assessment and provide context to the audit findings and the status of environmental management within the changing organisational context of the WMP.

- Revision of the Cultural Heritage Management Plan in consultation with the NgC is ongoing. A revised CHMP is required to replace the Appended NgC CHMP, to capture the signing of the Mining Agreement. Further, as the Mining Agreement was signed between BHP and NgC 22 September 2022, the EPA CHMP provisions require updating to reflect the commitments made in the Agreement.
- Regular (weekly, quarterly and yearly) meetings with the NgC concerning environment and approvals, as
 well as heritage subjects, have been well entrenched during the reporting period and continue to serve as
 important mechanisms for obtaining and maintaining free and prior informed consent (FPIC) from the
 traditional owners for planned project activities. The regular communications allow for the timely
 implementation of actions to ensure that both the NgC's and BHP's requirements can be met.



6. STATEMENT OF COMPLIANCE

A Statement of Compliance using the EPA Post Assessment Form 2 is provided in Appendix 6.



7. APPENDICES

A1. APPENDIX 1 - COMPLIANCE AUDIT TABLE FOR MS 1188

Terrestrial Fauna Management Plan Audit Table

TFMP Reference	Element	Requirements	Compliance Status	Evidence
1.4.3	Management Approach Table 12: Minimisation Measures for Direct Impacts to Significant Fauna	A considerable effort was made as part of the S38 application to reorient and reduce the size of Development Envelope to avoid impacts to environmental values. This included a reduction of the Development Envelope from 25,200 ha to 21,679 ha (13.3% reduction), and of the disturbance footprint from 3,961 ha to 3,830 ha resulting in the exclusion of some areas known to support significant fauna (such as the formally proposed Western Access Road and parts of the Southern Monitoring Area where deep sand spinifex occur). Under Attachment 1 to MS1188 (s45 C amendment) the clearing footprint has been increased from 3,830 ha to 4,213.3 ha.		 The requirements will be updated to reflect the amended clearing footprint following the submission of the revised TFMP to address the Section 45C decision report issued 02 February 2024. A considerable effort was made as part of the S45C application to maintain the size of Development Envelope to avoid impacts to environmental values including exclusion of some areas known to support significant fauna (such as the formally proposed Western Access Road and parts of the Southern Monitoring Area where deep sand spinifex occur). The increased clearance area required assessment and justification for each contributing piece of infrastructure. Clearing is less than the approved amount and is all within the approved Development Envelope. Cumulative clearing as 31 March 2024 is 597.4 ha.
		Adjustment of the Development Envelope to exclude habitat known to support significant species (excluded 82 % of Spinifex Sandplain habitat)	С	 Measures to avoid impacts to Sandplain Spinifex habitat are implemented, where possible, including redesign to avoid active skink burrows. No Spinifex Sandplain habitat was cleared during the reporting period. A pre-clearance survey by Lathwida was conducted in April 2023, enabling the design of the pipeline alignment, however due to delays, the pre-clearance required for actual clearing for sandplain spinifex has yet to occur. The Ranger team and TOs have been present for pre-clearing around existing pads developed during the exploration phase of the Project adjacent to SandPlain Spinifex habitat.
		Avoidance through informed design by minimising clearing to the smallest area possible and placing waste in-pit where practicable	С	 Land clearing for the reporting period is 259.8 Ha, bringing the cumulative clearing total to 597.4Ha. No mining waste was produced during reporting period as the project is in construction phase.
		Avoidance or minimisation through informed design by avoiding clearing of habitat for conservation-significant species and, where practicable, micro-sighting infrastructure during construction to avoid significant habitats	С	 A pre-clearance survey was done by Lathwida Environmental before first clearing in areas adjacent to Sandplain spinifex habitat commenced in April 2023. A record of the survey is maintained in the BHP document management system. Additional pre-clearance surveys were conducted by the Ng Ranger group prior to clearing works associated with existing drill pads adjacent to Sandplain Spinifex habitat. Records of pre-clearance surveys are maintained in the BHP document management system. A Register of GDS burrow locations is maintained and new burrow locations are added as and when discovered. Spatial data is maintained in the WMP central GIS database, including 50 metre buffer zones around known burrows. These buffer areas have also been pegged in the field using environmental pegs (blue and white striped caps on fence droppers). Works have been redesigned to avoid known skink burrows. Records of quarterly verification of land disturbance and exclusion zones are maintained in the AGOL-based LADP system to ensure no unauthorised ground disturbance or impacts to fauna has occurred.
		Siting of turbines outside of habitats known to support significant fauna species	NR	No turbines constructed to date.
		Consideration of the swept height of wind turbine blades above the vegetation canopy for wind farm design and development	NR	No turbines constructed to date.
		Exclusion of the use of barbed wire fencing to minimise impacts to bats and avian fauna	С	No barbed wire fencing has been installed on the project. Use of barbed wire has not been supported due to propensity of Camels to rub against the barbed wire and impact fencing integrity.
		Development and implementation of a site-specific internal land and clearing/disturbance procedure and associated permit to prevent clearing outside approved boundaries, and to minimise disturbance to only that required	С	 Construction - Land Access and Disturbance Procedure - issued for use 20/03/2023. All proposed works must have an approved LADP prior to commencement.



TFMP Reference	Element	Requirements	Compliance Status	Evidence
Tabl Me	Management Approach Table 12: Minimisation Measures for Direct Impacts to Significant Fauna	Development and implementation of a site-specific internal land and clearing/disturbance procedure and associated permit to prevent clearing outside approved boundaries, and to minimise disturbance to only that required	С	Records of quarterly verification of land disturbance and exclusion zones are maintained in the AGOL-based LADP system.
		The site induction program would provide information on protection of significant fauna habitats and land access and disturbance authorisation procedures	С	The site induction is mandatory for all employees and contractors. It contains extensive information on the protection of fauna including priority and threatened fauna (Great Desert Skink, Brush Tail Mulgara, Striated Grasswren, Southern Marsupial Mole), fauna habitat and the application inf the LADP system at WMP.
		A pre-clearance survey would be undertaken in Spinifex Sandplain to ensure that proposed clearing is aligned away from signs of Great Desert Skink	С	 Pre-clearance survey undertaken by Lathwida Environmental or Ng Ranger group prior to any proposed clearing work and to support project design to avoid GDS active burrows. Records of pre-clearance surveys are maintained in the BHP Document Management System. No Spinifex Sandplain habitat cleared during the reporting period.
		Implementation of a Feral Animal Monitoring and Control Program	С	 A pest fauna baseline assessment was conducted December 2023 to January 2024 in order to define the current pest fauna populations within the WMP development envelope. The findings of the baseline assessment were then used to develop a draft Pest Fauna Management Plan, which is currently with NgC for review. Quarterly feral fauna audits are conducted assess the management of fauna attractants, feral fauna sighting and interaction trends, and the delivery of feral fauna management interventions such as training and communication. Findings of the audits are maintained in the BHP document management system and actions raised in the BHP event management system as required. Workplace inspections conducted nominally fortnightly review infrastructure status, such as fencing, where installed and any pest fauna sighting, noting the landfill was not operational as of 20 April 2024. Pest and feral fauna observations and interactions are recorded in the BHP event management system to enable trend analysis and management measures to be implemented based on such trends. Wild dog (including dingo) interactions are logged in the BHP event management system. Where required management actions are sought to be implemented in consultation with the NgC. Feral and Pest animal management measures are included in induction material and a series of awareness sessions regarding wild dogs have been delivered to the workforce. Rodent control actions are undertaken by registered pest control service providers and records are maintained.
		 Various aspects of the conceptual and detailed design of the wind farm and individual turbines would take into account the following design features to reduce the risk of avian fauna and bat mortalities: Design of turbine towers with solid structure turbines, as opposed to lattice style structures to prevent birds, particularly raptors, using the turbines as perching and/or nesting locations, increasing the likelihood of rotor collision. 	NR	Turbine design has not been selected at time of this audit.
		 Size of turbines would be as large as practicable to allow the turbines to be more visible to avian fauna species and have lower blade rotational speeds than smaller turbines. Turbines would be designed to create less edges where possible. Provision of visibility enhancement devices. 		
		Progressive rehabilitation would be undertaken on disturbed areas as they become available	NR	Due to the project being in construction, rehabilitation is not yet relevant. Where possible, bore pads and geotechnical testing disturbance areas are rehabilitated upon confirmation that they will not be used in future.



TFMP Reference	Element	Requirements	Compliance Status	Evidence
1.4.3	Management Approach	Monitoring of analogue and rehabilitated areas would be undertaken to ensure short, medium and long-term rehabilitation objectives are achieved	NR	Project in construction phase. No rehabilitation work has commenced to date.
	Table 12: Minimisation Measures for Direct Impacts to Significant	Ongoing development of monitoring methodology and rehabilitation techniques would occur during the life of the project. Further assessments over time would plot the development of rehabilitated areas against analogue sites and progression towards completion targets	NR	 Project in construction phase. Seed harvesting program design currently under preparation including the engagement of the Indigenous Ranger group.
	Fauna	Preparation and regular update of a Mine Closure Plan consistent with DMIRS and EPA Guidelines for Preparing Mine Closure Plans (DMIRS, 2020)	С	Mine Closure Plan (MCP) Reg ID 103201 approved 11/08/2022 and most recently revised 18 January 2024. The first revision is due August 2027.



FVMP Reference	Element	Requirements	Compliance Status	Evidence
1.4.3	Management Approach Table 13: Minimisation Measures for Indirect Impacts to Significant Fauna	Firebreaks would be maintained around fixed plant areas	С	 Firebreak has been established around the perimeter of accommodation camp and is reflected in NgC Cultural Heritage Permit to Work on WMP Camp Firebreak issued 2022. Specifications for the establishment and maintenance of firebreaks are contained in the Bushfire Management Plan. Fixed plant under construction at time of audit. Adequate firebreaks are currently in place around fixed plant.
		Fire management infrastructure would be maintained on site and in vehicles, along with competent persons for the management of bushfires	С	 Daily vehicle and mobile plant pre-start inspection checks include checks of invehicle fire extinguishers. All fire-fighting equipment is audited quarterly by the relevant contracting partner and by Mercury Fire for BHP-owned firefighting equipment. ERT training schedule includes fire and rescue and is undertaken on a weekly basis. The Bushfire Management Plan was issued for use in August 2022 and contains in formation in firefighting equipment and firefighting training.
		A Hot Works procedure would be put in place to ensure adequate controls are put in place for activities that have the potential to result in bushfire	С	 All hot works outside designated workshop areas are subject to first obtaining a hot works permit. Records of hot work permits are maintained by the various contracting partners and BHP Site Services. Compliance to the hot work permit system is subject to regular WHS workplace inspections and audits. During total fire ban periods, DFES is notified by Site ERT prior to the commencement of hot works, where applicable.
		Fire management protocols and land management would be consulted with the Ngaanyatjarra Council to ensure that aligned fire management outcomes are achieved	С	Land management using controlled burns has been discussed with NgC and is not supported at this time. The current approach is to ensure adequate firebreaks around protected assets through removal of vegetation via grading. Further consultation with the NgC is anticipated.
2.3.1	Reporting Ngaanyatjarra Council and Ngaanyatjarra People	All reporting discussed in Section 2.3 of the TFMP will be made specifically available to the Ngaanyatjarra People through the Ngaanyatjarra Council, including where necessary periodic face-to-face meetings to discuss the results and outcomes of monitoring.	С	Statutory annual reports and fauna-related incident reports, including reports of culturally significant fauna deaths are made available to the NgC and the contents of reports are discussed during regular heritage and environment and approvals meetings, as well as during quarterly Heritage and Liaison committee meetings. Records of the provision of reports and the discussion of results are captured in the minutes of meetings that are maintained in the secure folders in SharePoint for confidentiality considerations.
2.3.2	Annual Reporting	OZ Minerals will prepare Annual Environmental Reports (AERs) to be submitted to regulatory authorities.	С	The first report was submitted to the DEMIRS in August 2023.
		A Compliance Assessment Report (CAR) will be submitted to the Compliance Branch at Government of Western Australia's Department of Water and Environmental Regulation (DWER) at an agreed date.	С	This document forms part of the second CAR that is due on 20 July 2024.
2.3.3	Incident Reporting	In recognition of the conservation status of the four species of significant fauna described in this TFVMP, OZ Minerals will report deaths directly attributable to the project. Relevant regulatory authorities (EPA, DBCA and Department of Mines, Industry Regulation and Safety (DMIRS)) will be notified within seven days of the death being recorded.	С	No deaths of one of the four species of conservation significant fauna were recorded during the reporting period. Records of all reported fauna deaths are captured in the BHP event management system.



FVMP Reference	Element	Requirements	Compliance Status	Evidence
2.3.4	Reporting to the Ngaanyatjarra Council	OZ Minerals will report key data from this TFMP to the Ngaanyatjarra Council, including: Fauna deaths attributable to the WMP, including mortalities of species considered significant to the Ngaanyatjarra people. Feral animal monitoring outcomes. These would be reported and/or presented in accordance with consultation and/or reporting schedules nominated within the Mining Agreement.	С	 All project-attributable fauna deaths, including of species considered culturally significant by the Ngaanyatjarra People are recorded in BHP event management system and reported to the NgC. During the reporting period the following culturally significant animals were killed in vehicle strikes attributable to Project Operations: a goanna on 29/9/2023 a sand goanna on 23/10 2023 a sand goanna on 13/11/2023 a sand goanna on 7/1/2024 a juvenile goanna on 1/2/2024 a juvenile goanna on 9/2/2024 a sand goanna on 9/2/2024 a sand goanna on 9/2/2024 Due to the increase in incidents in early 2024 targeted awareness material was presented to the workforce and appropriate contractors in February 2024. Record of the email notifications to the NgC is saved in the BHP event management system as records and NgC notified via email. Data is also summarised during the Heritage and Liaison Committee meetings. No conservation significant fauna deaths were recorded during the reporting period. The feral and pest animal monitoring program is ongoing, and records of fauna interactions are kept in the BHP event management system. The results of the pest fauna baseline monitoring conducted December 2023 through to January 2024 were presented to NgC during a pest fauna workshop held Q1 2024. The results provide data to develop the integrated pest fauna management plan, currently with NgC for review. The camel and wild dog management program remains under development with the NGC Camel Company, levels are currently manageable, and any control required is at an individual level for wild dogs only.
3.1	Management Review	 Review processes for the TFMP will be based on formalised dates after project commencement and triggers such as: Monitoring results: If site-specific monitoring program results indicate that management targets are not being achieved. Changes in knowledge: If new information about a species' use of the Development Envelope or region is received which would better inform management approaches. Significant changes to project design: The relevance and effectiveness of existing management measures would be considered and amended as appropriate. This Management Plan will also be reviewed and revised following any significant changes to the project from that described within the EPA Section 38 Referral (OZ Minerals, 2021). 	C	 Review commenced Q1 of 2024 arising from Monitoring Results and Changes in Knowledge; to incorporate new knowledge of Great Desert Skink populations and habitat preferences resulting from additional targeted surveys undertaken in Q1/2 2023, as well as integrate recommendation of the Threat Abatement plan for the Great Desert Skink issued by DCCEEW under EPBCA. The revised TFMP is currently under review by NgC prior to submission to address requirements following the Section 45C variation decision report issued 2 February 2024. See above. No significant changes to the Project. Revised plan to be submitted to DWER Q3 2024.
		OZ Minerals will also review this plan within one year following implementation of the project, including a review of the management actions, monitoring methods and reporting requirements.		Revised plati to be subifiitted to DVVLR Q3 2024.
		Following any significant changes, the updated plan will be submitted to DWER for approval.		



TFMP Objective Based EMP Audit Table

Management Objective: Minimise loss of significant fauna habitat and fragmentation as a result of project-related land clearing Key Impacts and Risks:

- Decrease in poorly represented fauna habitat as a result of land clearing for the pipeline and service corridor alignment
- Significant decrease in richness and abundance of fauna, including significant fauna, as a result of interactions with project-related vehicles and machinery or entrapment
- Increase richness and abundance of predator species resulting from project-related attractants (water and food sources) result in higher levels of predation of native fauna

Decrease in the richness and abundance of poorly represented fauna habitat and significant fauna species as a result of project-related altered fire regimes						
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence	
 Clearing in accordance with internal land clearing procedure Minimise amount of active cleared land 	Total project-related land disturbance is to be within the approved Development Envelope and not to exceed the approved area	 Annual reconciliation of land access and disturbance-related survey data with the respective year's aerial imagery Annual review of internal project- related land access and disturbance register relative to actual project- related land disturbance and LADPs 	 Internal project-related Land Access and Disturbance Register and LADPs Mining Rehabilitation Fund (MRF) annual reporting Annual WMP Compliance Assessment Report 	С	 All clearing is authorised and controlled under Land Access and Disturbance Permits (LADP). The LADP approval/planning process helps to minimize the extent of land clearing. Monthly assurance is performed for each LADP by the permit holder to ensure compliance, especially with regard to the avoidance of heritage and ecological exclusion areas and remaining within the approved disturbance envelope. Disturbance is reported monthly using data obtained using survey methods. All clearing records are maintained within the ArcGIS Online (AGOL) based LADP system. The first MRF report was submitted to DEMIRS in July 2023. This document forms part of the second CAR that is due on 20 July 2024. 	
Management Objective: Minimise death or injury to significant fauna in the Development Envelope as a result of project-related land clearing						
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence	
Undertake pre-disturbance surveys: in Spinifox Sandplain habitat to	No reasonably preventable death or injury to significant.	Great Desert Skink burrow location and status data	Pre-disturbance survey records including significant	C	• A GDS pre-clearance survey was conducted by Lathwida Environmental in April 2023. A record of the survey is maintained in the BHP Document Management	

- in Spinifex Sandplain habitat to map all active Great Desert Skink burrows
- o prior to proposed projectrelated land disturbance with adequate lead time (two months is recommended) to allow for design amendment to ensure avoidance of all active **Great Desert Skink burrows**
- o to undertake designation/ demarcation as 'fauna exclusion zones' prior to project-related land disturbance
- · Fauna spotter present during all project-related land disturbance in Spinifex Sandplain habitat
- Where relocation of burrows is required, this will be discussed/agreed with the Department of Biodiversity Conservation and Attractions prior to any relocation being undertaken

- death or injury to significant fauna attributable to projectrelated land disturbance activities
- No loss of active Great Desert Skink burrows due to projectrelated land disturbance
- The Ngaanvatiarra Ranger Teams will be invited to participate in pre- disturbance monitoring activities (subject to fair and reasonable commercial terms)
- collected during predisturbance surveys.
- Fauna spotter to record observations of significant fauna and burrows during projectrelated land disturbance in Spinifex Sandplain habitat, including written records and photographs, where appropriate
- Records of engagement with the Ngaanyatjarra Council relating to participation in pre-disturbance survey work
- Opportunistic identification of fauna mortalities

- records including significant fauna observations and fauna mortality records.
- Fauna spotter recorded significant fauna observations including fauna mortality. GIS records of pre-
- disturbance survey records. fauna exclusion zones and locations of significant fauna recorded by fauna spotter. Annual WMP
- Compliance Assessment Report

- System and the spatial data stored in the central spatial database. Additional pre-clearance surveys were conducted prior to all subsequent clearing work adjacent to Sandplain Spinifex habitat, and to inform final design with respect to the pipeline and bore locations. Records of pre-clearance surveys are maintained in the BHP document management system. A Register of GDS burrow locations is maintained and new burrow locations are added, as and when, discovered. Spatial data is maintained in the WMP central spatial database, including 50 metre buffer zones around known burrows. These buffer areas have also been pegged in the field using environmental pegs (blue and white striped caps on fence droppers).
- GDS habitat locations and GDS exclusion areas were defined in the LADP system, that has been used to ensure that ground disturbance is designed to avoid impacts on GDS habitat. Following a further survey by Lathwida in August 2023 the habitat mapping was further refined but did not change materially from previous mapping. Additional habitat definition was conducted April 2024 to better define the habitat preferences of the GDS and maximise survey coverage. Further pre-clearance surveys will be conducted 2-3 months prior to proposed clearing dates in NBF.
- No Spinifex Sandplain habitat was disturbed during the reporting period; however, spotters are utilised during all clearing work in the Northern Borefield (NBF) as a condition of the LADP. Spotters from the community were present during clearing works associated with the access track associated with the extent of the wind turbine generator alignment.
- There were no deaths of conservation significant fauna attributable to project activities recorded during reporting period. The deaths of culturally significant fauna species due to vehicle interactions have been reported to the NgC. There was no loss of Great Desert Skink burrows during the reporting period
- and no relocations were required.



Management Objective: Minimise deat	h or injury to significant fauna as a resu	Ilt of interactions with project-related veh	nicles or machinery		 Records of invitations to traditional owners to participate in pre-disturbance and disturbance monitoring activities are maintained in the minutes of regular communication between BHP and the NgC as well as the monitoring sheets submitted to NgC after each monitoring event. Pre-clearance survey activities conducted were undertaken by Indigenous Rangers. This document forms part of the second CAR that is due on 20 July 2024.
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
 Speed limits restricted to a maximum of 20 km/hr in close vicinity of Deep Sand Spinifex habitat, 60 km/hr in all other project areas, 80 km/hr on the main northern access road; with appropriate speed limit signage in place. Off-road driving not permitted outside of cleared areas. All fauna-vehicle interactions to be reported with time and location to allow investigation and data collection. Personnel inductions include discussion of speed limit restrictions requirements to report fauna-vehicle interactions and the non-compliance process 	e	Quarterly review of records of speed limit non-compliances Identification of traffic related fauna mortalities through incident report data collection and investigation	 Annual WMP Compliance Assessment Report Internal incident reporting and non- compliance reporting Fauna mortality records Induction records Regulatory agency notification of incident for significant fauna 	C One NC	 Speed limits are clearly demarcated on all roads and on tracks and conditioned in LADPs issued for work in and adjacent to GDS habitat. Inductions include on-site driving requirements, prohibition of off-road driving, information on speed limits and fauna "right of way" rules. Induction records are maintained in the BHP human resources and training system. No deaths of any of the four conservation significant fauna species were recorded during the reporting period. Seven culturally significant fauna deaths associated with vehicle interactions occurred during the reporting period, i.e. Six goannas were killed in interactions with WMP vehicles. All fauna deaths are recorded in the BHP event management system for tracking and auditing purposes. All culturally significant fauna deaths are reported to NgC. Speed monitoring is performed informally by observation only. Instances of speeding are recorded in the BHP event management system and appropriate corrective actions implemented. NC: Quarterly reviews of records of speed limit non-compliance were not undertaken during the reporting period, rather reviews are conducted informally, and site notifications issued when repeat speed limit non compliances are detected. Detected speed limit exceedances are entered into the BHP event management system. Review of speed limit non-compliances within WMP is undertaken ad hoc and via campaigns, responses include workforce education and site wide notices. There is no formal mechanism for monitoring speed limit non-compliances during the Project phase and this will be addressed during the operational phase via the use of Vehicle Management Systems in site vehicles. The transitory nature of the Project phase for different workgroups makes mandatory VMS difficult to implement and enforce. This document forms part of the second CAR that is due on 20 July 2024.



Management Objective: Minimise adverse impacts on significant fauna as a result of project-related pipeline construction								
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence			
 Undertake pre-disturbance surveys: in Spinifex Sandplain habitat to map all active Great Desert Skink (GDS) burrows Prior to project-related land disturbance with adequate lead time (two months is recommended to allow for design amendment to ensure a minimum buffer distance of 50 m between active Great Desert Skink burrows and pipelines to undertake designation/ demarcation as 'fauna exclusion zones' prior to project-related land disturbance Fauna spotter present during all project- related land disturbance in Spinifex Sandplain habitat Daily fauna removal from trenches during pipeline construction Fauna egress installed in open trenches during construction Pipelines in Spinifex Sandplain habitat to be buried or elevated ≥100 mm above the ground at least every 100 m 	 pipeline construction No loss of active Great Desert Skink burrows due to land disturbance for project-related pipelines The Ngaanyatjarra Ranger Teams will be invited to participate in pre- disturbance and disturbance monitoring activities (subject to fair and reasonable commercial terms) 	 Great Desert Skink burrow location and status data collected during pre- disturbance surveys Fauna spotter to record observations of significant fauna and burrows during project-related land disturbance in Spinifex Sandplain habitat, including written records and photographs, where appropriate Records of engagement with the Ngaanyatjarra Council relating to participation in pre-disturbance survey work Daily trench inspections with records of fauna removal during pipeline trenching activities 	 Pre-disturbance survey records including significant fauna observations Fauna spotter recorded significant fauna observations including fauna mortality GIS records of pre-disturbance survey records, fauna exclusion zones and locations of significant fauna recorded by fauna spotter Annual WMP Compliance Assessment Report 	NR	 Conditions relating to pipeline construction are not applicable at this stage as pipeline construction has not commenced during the reporting period. Preclearance surveys were undertaken to ensure proposed pipeline alignment and bore locations avoid active skink burrows. The pipeline will be buried, except for isolated valve and pigging stations to minimise disturbance of Sandplain Spinifex habitat to the greatest extent practicable. A GDS pre-clearance survey was conducted by Lathwida Environmental in April 2023. GDS habitat locations and GDS exclusion areas are defined in the LADP system and central spatial database, which is used to ensure that ground disturbance is designed to avoid impacts on GDS habitat. Following a further survey by Lathwida in August 2023 the habitat mapping was further refined but did not change materially from previous mapping. Additional habitat definition was conducted April 2024 to better define the habitat preferences of the GDS and maximise survey coverage. Further pre-clearance surveys will be conducted 2-3 months prior to proposed clearing dates in NBF to ensure GDS active burrow avoidance during construction. Records of all pre-clearance surveys are maintained in the BHP document management system. A Register of GDS burrow locations is maintained and new burrow locations are added as and when discovered. Spatial data is maintained in the BHP central spatial database, including 50 metre buffer zones around active burrows. These buffer areas have also been pegged in the field using environmental pegs (blue and white striped caps on fence droppers). No Spinifex Sandplain habitat was disturbed during the reporting period; however, spotters are utilised during all clearing work in the Northern Borefield (NBF) as a condition of the LADP. Spotters from the community were present during clearing works associated with the access track following the wind turbine generator alignment. Contractors are required to implement tr			

Management Objective: Minimise adverse impacts to significant fauna as a result of project-related increase in feral animal abundance								
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence			
 Install fencing around domestic waste facilities minimise access to waste Construct and rehabilitate project borrow pits and all other constructed landforms to minimise permanent or long-term water holding Develop, implement and update a Feral Animal Monitoring and Control Program within the Development Envelope for the operational phase in response to construction phase and ongoing monitoring results 	 Minimise feral fauna species access to attractants (e.g. water sources and uncovered waste) Minimise feral fauna species access to ponded water in constructed landforms, including borrow pits Reduced observations of feral fauna species in project attractant areas (landfill, WWTP, water storage ponds, accommodation village) 	Quarterly feral animal monitoring and recording at attractant locations, including: o presence/absence o species o status of fencing o status of attractants (water storage, waste management) Post-rehabilitation earthwork inspections Post-rainfall inspections Workplace inspections (WWTP, landfill, water storages) Opportunistic fauna observations	 Internal incident reports Annual MRF reports Feral fauna species monitoring and control program records Annual WMP Compliance Assessment Report 	С	 New landfill has full fauna exclusion perimeter fence installed and concrete aprons at swinging gates to prevent terrestrial fauna access. Fauna grid extends below ground level. The rock quarry has a groundwater accumulation sump that has been provided with a sloped egress point for larger animals (especially camels). Rock pitching on all inner slopes facilitates egress by smaller animals. The area is not suitable for fencing to prevent fauna access due to ongoing access requirements for sourcing hard rock from the quarry. Camera traps placed at this location have not seen a large increase in pest fauna species, as verified through the baseline assessment conducted Dec2023 – January 2024. The recycled water turkeys' nest has been provided with a sloped egress point for larger animals (especially camels). Rock pitching on all inner slopes facilitates egress by smaller animals. The area is not suitable for fencing to prevent fauna access due to ongoing access requirements for construction. Camera traps placed at this location have not seen a large increase in pest fauna species, as verified through the baseline assessment conducted Dec2023 – January 2024. If anything, this location supports native species such as 			



Management Objective: Minim	nise adverse impacts to significant fauna a	as a result of project-related increase in	eral animal abundance		
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
Management Action	Management Target	Monitoring	Reporting		migratory birds and small local bird species. Project borrow pits are currently in use for construction purposes and not yet ready for rehabilitation. Temporary construction turkeys nests adjacent to the aerodrome were fences and have been infilled and remediated following cessation of use. A pest fauna baseline assessment was conducted December 2023 to January 2024 in order to define the current pest fauna populations within the WMP development envelope. The findings of the baseline assessment were then used to develop a draft Pest Fauna Management Plan, which is currently with NgC for review. Wild dog (including dingo) interactions are logged in the BHP event management system. Where required management actions are sought to be implemented in consultation with the NgC. Feral animal management measures are included in induction material and a series of awareness session regarding dingoes have been delivered to the workforce. Implementation of feral fauna management during construction and operations are managed under an agreement between BHP and the NGC Camel Company. Feral fauna access to attractants is minimised through the use of lidded waste receptacles, adoption of wild dog-resistant waste bins in the village and covering of interim waste skips with heavy netting. Quarterly feral fauna audits are conducted assess the management of fauna attractants, feral fauna sighting and interaction trends, and the delivery of ferauna management interventions such as training and communication. Findings of the audits are maintained in the BHP document management system as required. Pest and feral fauna observations and interactions are recorded in the BHP event management system as required. Pest and feral fauna observations and interactions are recorded in the BHP event management system as required. Rehabilitation of borefield development sumps is ongoing as bores are completed. Some sumps are required to be maintained for future sump testin and will act as attractant following rainfall. These will be rehabi
					 completed. Some sumps are required to be maintained for future sump testin and will act as attractant following rainfall. These will be rehabilitated when borefield construction is finalised. Post rainfall inspections are conducted to identify accumulations of water due to project activities, where required, these accumulations may be drained and tested depending on potential contamination. Pre-rainfall inspections are also conducted to ensure sufficient capacity in bunds etc prior to rainfall to preven
					 overtopping. Opportunistic fauna observations and fauna interactions are logged by all personnel in the BHP event management system.
					 Camera traps are routinely placed across WMP to monitor for pest and significant fauna. Locations are highly variable, and may occur anywhere ther is access, or a potential attractant source, or where reports of feral fauna sightings have been recorded in the BHP event management system.
					 The first MRF report was submitted to DEMIRS in July 2023 This document forms part of the second CAR that is due on 20 July 2024.

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Management Objective: Minimise adverse impacts to significant fauna as a result of project-related altered fire regime								
Management Action	Management Target	Monitoring	Reportin g	Compliance Status	Evidence			
 Develop and maintain a Fire Mitigation Plan and incorporate into the Asset Emergency Management Plan Install and maintain fire extinguishers and firefighting equipment in the project area and on site to relevant Australian Standards Install and maintain firefighting equipment in machinery and vehicles undertaking land disturbance activities Project emergency response personnel trained in fire and bushfire response Vehicles kept to access tracks or cleared areas Develop and implement a Hot Work Permit system Fire management practices developed in consultation with WA Department of Fire and Emergency Services (DFES) and the Ngaanyatjarra Council, including installation and maintenance of firebreaks if required Site induction to include information on prevention, management and response to fires 	 No unplanned fires attributable to project-related activities Minimise the potential environmental damage from project-related extreme or out-of-control wildfires attributed to project-related activities 	Emergency response equipment inspections relative to relevant Australian Standards Annual fire response training exercise including wildlife response Annual review of fire break development for evidence of adequate installation and maintenance	 Internal incident reports Internal project-related Land Disturbance Register and LDPs Hot Work Permit register Induction and training records Annual WMP Compliance Assessment Report 	C	The Bushfire Management Plan (WM-0000-WHS-PLN-0009) was issued for use on 29/08/2022 and is currently under revision. Quarterly fire appliance audits are conducted to ensure compliance with the commitments in this plan. Findings of the audits are maintained in the BHP document management system and actions raised in the BHP event management system, as required. All fire-fighting equipment is audited quarterly by the relevant contracting partner and by Mercury Fire for BHP-owned firefighting equipment. All vehicles and mobile plant are equipped with firefighting equipment that is checked daily as part of the pre-start inspection. All emergency response personnel are trained in fire and bushfire response. Training is conducted weekly. Site rules prohibit departure from defined access tracks during operations. Departure during Project development is conducted only as required and is monitored by inspections and LADP system reporting. A hot works permit system has been established and all hot works outside established workshop areas are recorded in the Hot Works Registers maintained by the various contracting partners and BHP Site Services. DFES are notified of any hot works intended to occur during a total fire ban as required, prior to the works commencing. Information on prevention and response to fires is contained in the site induction material. No fires with the potential to cause environmental harm were recorded within the reporting period. An ozone reacting with a carbon filter fire occurred at the WWTP that caused no environmental harm from bushfires are contained. Arrangements to minimise the potential environmental harm from bushfires are contained in the Bushfire Management Plan (WM-0000-WHS-PLN-0009), that aligns with relevant DFES standard operating procedures. A memorandum of understanding for Mutual Support in Planning and Responding to Emergency Incidents was concluded between DFES and OZ Minerals Musgrave Operations Pty Ltd on 22 August 2022. Firebreak has been established around the p			





A2. APPENDIX 2 – AUDIT FINDINGS FOR CHMP IMPLEMENTATION

Cultural Heritage Management Plan Audit Table

CHMP Reference	Element	Requirements	Compliance Status	Evidence
1.2	Context and Rationale Golden Rules	Do not start ground disturbing or non-ground disturbing work without an approved Land Disturbance Permit (LDP) (for ground disturbing activities) or Permit to Work (PTW) (for non-ground disturbing activities) as issued by the Ngaanyatjarra Council.	C One NC	 Permit to Work 1 issued 28 October 2022, Permit to Work 2.1 (for low impact activities, such as surveys) approved 28/02/2023. Spatial data permits are maintained in the Aconex Document Management System (Aconex) and the BHP spatial database. As per the Mining Agreement and LAD procedure, no works (ground disturbing or otherwise) can occur without an approved PtW or LADP.
				ArcGIS Online (AGOL) LADP layers show that all disturbance on site is covered by an LADP that was approved under the Land Access and Disturbance Procedure. Current evidence showing that all work has been conducted within approved Permit to Work areas are maintained in the BHP spatial database.
				NC A breach of the CHMP Golden Rules occurred 27 March 2024 and involved the following:
				 An excavator operated under guidance was returning from test pitting at the solar array phase 1. The excavator travelled along a non-nominated road within an exclusion zone and outside of the Mining Agreement to return to the Central Mining Agreement. There was no environmental damage outside of the footprint of the well-formed road. In terms of failed controls that led to the event, the track was signposted with 'no-access' signage at both ends; however, signage was missing from one end (star pickets still standing in place). Signage for these tracks is installed adjacent to the track (rather than hard barricading) to ensure continued community access to utilise the road(s). This event also constitutes a breach from the Golden Rules (#2) in
				that a designated transport area was left. • The event was first reported to the NgC in a telephone call by the
				General Manager, West Musgrave Operations to the CEO Ng Council, in April 2024 when the event was detected.
				The following immediate actions were taken:
				All works associated with regional ground disturbance ceased (e.g. borefields, power package, rehabilitation and TSF) whilst the investigation was in progress and so that an audit of no-access signage throughout the development area could be completed.
				The audit of regional signage identified additional areas, where signage installed as required.
				Escalation process undertaken and full BHP ICAM investigation initiated.
				As a result of the BHP ICAM investigation detailed corrective actions were identified to prevent a recurrence of the event. These actions have been raised in the BHP event management system to ensure tracking and close out and include:
				Ensuring all personnel are aware of the requirement to obtain approval for proposed paths used to access work areas before commencing works under an LADP.
				NgC consultation re possible hard barricading
				Improvements to the RightStep geofencing system
				Expediting completion of the East-West access road
				A quality review of implemented actions 30 days after close-out. The full investigation is engaging following PUDG findings NGC have been
				The full investigation is ongoing, following BHP's findings NgC have been provided with further opportunity to review and provide input to the suitability of the actions and further consultation with the community.



CHMP Reference	Element		Requirements	Compliance Status	Evidence
1.2	Context and Rationale	If you are unsur	designated work areas, accommodation areas or transport areas, unless in the case of an emergency	C One NC	Induction covering the golden rules is compulsory for everyone coming to site. Induction material is maintained in ComplyFlow – and
	Golden Rules		re about whether you're operating or traversing through an approved work area, or if you think you've found cultural heritage eletal remains, stop all works within a 50 m radius and tell your supervisor	C One NC	 records of completion recorded and extracted from PeopleTray. Requirements conditioned in individual Land Access and Disturbance Permits (LADP) issued for each scope of work, monthly assurance
			a breach of the 'Golden Rules', or what is thought may be a breach, tell your supervisor immediately. OZ Minerals and the Council must be notified as soon as practicable to determine next steps.	C One NC	activities verify compliance. NC A breach of the CHMP Golden Rules occurred 27 March 2024 and involved the following:
				• An excavator operated under guidance was returning from test pitting at the solar array phase 1. The excavator travelled along a nonnominated road within an exclusion zone and outside of the Minin Agreement to return to the Central Mining Area. The event is considered a non-compliance to the Mining Agreement. There was no environmental damage outside of the footprint of the well-former road. In terms of failed controls that led to the event, the track was signposted with 'no-access' signage at both ends; however, signage was missing from one end (star pickets still standing in place). Signage for these tracks is installed adjacent to the track (rather than hard barricading) to ensure continued community access to utilise the road(s).	
				 This event also constitutes a breach from the Golden Rules (#2) in that a designated transport area was left. The event was first reported to the NgC in a telephone call by the General Manager, West Musgrave Operations to the CEO Ng Council, in April 2004, the attendance of the standard of the CEO Ng Council, 	
					in April 2024 when the event was detected. The following immediate actions were taken:
					All works associated with regional ground disturbance ceased (e.g. borefields, power package, rehabilitation and TSF) whilst the investigation was in progress and so that an audit of no-access signage throughout the development area could be completed.
					The audit of regional signage identified additional areas, where signage installed as required.
					Escalation process undertaken and full ICAM investigation initiated. As a result of the BHP ICAM investigation detailed corrective actions were identified to prevent a recurrence of the event. These actions have been raised in the BHP event management system to ensure tracking and close out and include:
					Ensuring all personnel are aware of the requirement to obtain approval for proposed paths used to access work areas before commencing works under an LADP.
					 NgC consultation re possible hard barricading Improvements to the RightStep geofencing system Expediting completion of the East-West access road
					A quality review of implemented actions 30 days after close-out. The full investigation is ongoing, following BHP's findings NgC have been provided with further opportunity to review and provide input to the suitability of the actions and further consultation with the community.
					 Process of notification to NgC in the event of a potential breach of the Golden Rules is verbal, followed up by written notification. Additional information would be provided as the investigation proceeds and outcomes are developed. Records of communication with NgC for all events are maintained in the Heritage event register and NgC notification register, maintained in the BHP document Management System (SharePoint).
1.7.1.4	Indirect Impacts Table 5: Mitigation	Dust	Vehicles not permitted to leave access tracks or cleared areas without an approved Permit to Work (PTW) from the Ngaanyatjarra Council.	C One NC	 Included in site induction material and a condition of all LADPs. Compliance with LADP is reported on monthly (including spatial data), verified through monthly self-assessment, and during Environmental Department Inspections.



CHMP Reference	Element		Requirements	Compliance Status	Evidence
	Measures for the Indirect Impacts to Cultural Heritage				Under Permits to Work 1 and 2.1, vehicles are permitted to leave access tracks/roads for purposes of constructing new infrastructure or undertaking surveys.
1.7.1.4	Indirect Impacts Table 5: Mitigation Measures for the Indirect Impacts to Cultural Heritage	Dust			Note Permit to Work system only applies within the Mining Agreement area for the purposes of Project Operations, a number of 'nominated roads' are permitted for use by BHP outside of the agreement area to access more remote areas of the Development Envelope (i.e. Northern Borefields and Power Package areas) NC A breach of the CHMP Golden Rules occurred 27 March 2024 and
					 involved the following: An excavator operated under guidance was returning from test pitting at the solar array phase 1. The excavator travelled along a nonnominated road within an exclusion zone and outside of the Mining Agreement to return to the Central Mining Area. The event is considered a non-compliance to the Mining Agreement. There was no environmental damage outside of the footprint of the well-formed road. In terms of failed controls that led to the event, the track was signposted with 'no-access' signage at both ends; however, signage was missing from one end (star pickets still standing in place). Signage for these tracks is installed adjacent to the track (rather than hard barricading) to ensure continued community access to utilise the road(s). This event also constitutes a breach from the Golden Rules (#2) in that a designated transport area was left.
				С	Addressed in site induction.
			Machinery movements will be confined to defined roads and tracks.	One NC	LADP process used to address approved access areas and requirements conditioned in approved permit.
					Machinery movement during construction is not confined to roads and tracks as land clearing is required to implement the project. These movements are within approved permits to work issued by NgC and controlled by the LADP process.
					NC A breach of the CHMP Golden Rules occurred 27 March 2024 and involved the following:
					 An excavator operated under guidance was returning from test pitting at the solar array phase 1. The excavator travelled along a nonnominated road within an exclusion zone and outside of the Mining Agreement to return to the Central Mining Agreement. There was no environmental damage outside of the footprint of the well-formed road. In terms of failed controls that led to the event, the track was signposted with 'no-access' signage at both ends; however, signage was missing from one end (star pickets still standing in place). Signage for these tracks is installed adjacent to the track (rather than hard barricading) to ensure continued community access to utilise the road(s). This event also constitutes a breach from the Golden Rules (#2) in
					that a designated transport area was left.
			Vehicles required to travel at safe operating speeds on unsealed roads and are restricted from accessing rehabilitated surfaces except for rehabilitation management purposes	С	 Vehicle speed limits are signposted and implemented on site. Compliance is enforced by supervisory personnel and an automatic vehicle checking system (electronic display board) has been implemented on the main site road. Requirement to adhere to posted speed limits reinforcement during pre-start and Simultaneous Operations (SIIMOPs) activities.
					 Major civil contractor (Exact) has implemented satellite speed monitoring. There are no rehabilitated areas as the Project is in construction



CHMP Reference	Element		Requirements	Compliance Status	Evidence												
					phase.												
1.7.1.4	Indirect Impacts		OZ Minerals will seal the offset-T intersection where the northern access road crosses over the Warburton to Blackstone Road to the cutline road. The sealing will include nominally 500 m to 750 m of the northern access road and cutline road, and the area of the Warburton to Blackstone Road between these two intersection points.	NR	Road construction of alternative Northern Access Road to site has not commenced during the reporting period. Intention is to construct alternative access.												
	Table 5: Mitigation Measures for the Indirect Impacts to Cultural Heritage	Dust	An alternative to sealing sections of the Northern Access Road will be a road realignment further from an existing heritage exclusion zone (subject to approval from the Ngaanyatjarra Council and attaining of relevant regulatory approvals)	NR	Recent consultation for the new Northern Access Road (NAR) alignment uncovered that TOs were in the opinion that the proposed NAR is too close to some of the ethnographic sites in the area. As a result, consultation is ongoing to agree on a revised alignment. Records of the latest communication between the NgC and BHP regarding the road realignment are contained in minutes of the West Musgrave Heritage Meetings.												
			Land clearing would be kept to the minimum necessary for development of the project, reducing exposed areas subject to wind erosion.	С	 The area of disturbance as of 20 April 2024 was 597.4 ha. Areas not required for construction in the long term have not been cleared during the reporting period. Clearing minimisation is conditioned in the LADPs and land clearing cannot commence until an approved disturbance layer is issued, taking into consideration the design requirements and approved disturbance footprint under the Mining Proposal for mine activity categories. 												
					 Records of clearing are maintained in LADP system. The extent of clearing in relation to current development areas indicates that excessive clearing was not conducted in relation to current development areas. Wet suppression is implemented to reduce wind erosion arising from roads and exposed surfaces. Application of polymer on non-trafficable areas also utilised where appropriate. 												
															Undertaking of annual (or as otherwise reasonably requested by the Ngaanyatjarra Council) photo-point monitoring for all cultural heritage sites (including archaeology sites) within the main development area and to within 3 km of the main development area and as otherwise reasonably requested by the Ngaanyatjarra Council, to undertake comparative analysis of dust accumulation against control sites. Ngaanyatjarra Senior Knowledge Holders and Traditional Owners will be invited to attend this monitoring through the Ngaanyatjarra Council and will be engaged to attend this monitoring on commercially acceptable terms.	С	 Alternative mechanism with equivalent outcomes to photo point monitoring has been implemented as photo point monitoring raises confidentiality and access issues with respect to sensitive cultural heritage material, restrictions associated with accessing areas outside of the Development Envelope and Mining Agreement areas, and ability to accurately detect dust deposition over heritage areas.
																	Undertake quarterly quantitative monitoring of dust deposition gauges, within the main development area and to within 3 km of the main development area and as otherwise reasonably requested by the Ngaanyatjarra Council, to support analysis of dust accumulation at cultural heritage sites over time and in comparison, against control sites. Ngaanyatjarra Senior Knowledge Holders and Traditional Owners through the Ngaanyatjarra Council will be invited to jointly design dust monitoring programs and attend dust monitoring programs and will be engaged on commercially acceptable terms.
			An exceedance of dust will be determined where the Ngaanyatjarra People or Ngaanyatjarra Council have raised concerns based on photo point monitoring, or formalised grievance and static dust monitoring indicates a significant increase of dust at the specified site, compared with control sites.	С	 Concerns were raised during the reporting period by NgC at the regular environment and approvals meeting help between NgC and BHP, in relation to the dust reporting results submitted to the NgC for depositional dust monitoring. The concerns were raised with respect to a monitoring location within the active works areas adjacent to the crushing and screening plant, which exceeded trigger values for the 12-month rolling average according to the adopted NSW guidelines. Clarification was provided that at the single affected location, the values are below the threshold value and mitigation measures were being implemented. Mitigation measures that have been adopted to address dust levels include polymer application on non-trafficable surfaces, increased 												
					 water cart frequency, installation of water sprays and curtains on crushing circuit. Requirement to adhere to posted speed limits and water cart application on roads mitigates dust generation from trafficable surfaces. 												



CHMP Reference	Element		Requirements	Compliance Status	Evidence
1.7.1.4	Indirect Impacts Table 5: Mitigation Measures for the Indirect Impacts to Cultural Heritage	Dust	Where practicable, land clearing would be undertaken progressively with the amount of active disturbance minimised	С	 Notification of commencement of the Proposal was provided to DWER on 10 July 2022. The area of disturbance on 20 April 2024 was 597.4 ha. Land clearing is conducted to minimise the area of active disturbance to the extent required for short-term construction activities. Records of clearing are maintained in LADP system. The extent of clearing in relation to current development areas indicates that excessive clearing was not conducted in relation to current development areas. Clearing minimisation is conditioned in the LADPs and land clearing cannot commence until an approved disturbance layer is issued, taking into consideration the design requirements and approved disturbance footprint under the Mining Proposal for mine activity categories.
			Progressive rehabilitation would be undertaken on disturbed areas as they become available	NR	Project in construction phase
			Topsoil and vegetation (including woody debris) would be re-spread over rehabilitated areas to act as a seed source and to protect the soil from erosion	NR	Project in construction phase
			Dust managed by watering unsealed roads with a water cart or with fixed sprays as required	С	 Dust suppression activities on trafficable areas are implemented by water cart. Dust generation at crushing activities is managed by the implementation of water sprays on raw ore stockpiles and at the crushers' discharge points. Planned maintenance of the dust suppression system is included in each mobile crusher's total maintenance and was assessed during the Horizontal Earthworks Package audit of 9 January 2024. Mitigation measures that have been adopted to address dust levels include polymer application on non-trafficable surfaces, increased water cart frequency, installation of water sprays and curtains on crushing circuit. Requirement to adhere to posted speed limits and water cart application on roads mitigates dust generation from trafficable surfaces. A notable exclusion are the calcrete stockpiles, that are not watered to prevent the blinding of crusher screens by wet calcrete fines. Visual monitoring of dust generation is increased during calcrete crushing and crushing operations may be stopped under high wind conditions. Excessive dust generation is reported in the event management system. Significant events are reported in the BHP event management system, investigated and actions taken to prevent reoccurrence where required.
			During high winds (wind speeds greater than 40 km/h averaged over 10 minutes), topsoil and overburden stripping and other high dust generating activities would be restricted.	С	 Wind speed restrictions are implemented by operational personnel in consultation with the Environmental Department. During high winds, dust generating activities are evaluated and suspended/postponed based on wind speeds recorded at the on-site weather station and when visibility and dust levels are observed to be at levels deemed unacceptable for ongoing operations by the on-site environment team, as required, in accordance with the Dust Management Procedure (Table 4.1). A condition of the LADPs issued for works required that dust generating activities cease during unfavourable conditions, including wind speeds > 40km/hr and when visibility is impaired prior to that. The weather forecast is discussed during the daily pre-start and forecast high wind conditions are noted to allow for the preparation of dust suppression activities or resequencing of proposed works, as required.
			Spilt ore and materials outside of the ore processing areas would be regularly cleaned up and removed to a designated waste landform or fed into the processing plant.	NR	Project in construction phase
			Bulk products would be transported in covered containers	NR	Project in construction phase
			Vehicle hygiene measures would be adopted for the concentrate storage shed (including covered shed and maintain a system to avoid land contamination during transport of concentrate which will include sprayers, wheel wash stations or similar alternative).	NR	Project in construction phase



CHMP Reference	Element	Requirements		Compliance Status	Evidence
1.7.1.4	Indirect Impacts Table 5: Mitigation Measures for the Indirect Impacts to Cultural Heritage	Dust	Ensure that the cleared area is as small as reasonably required thereby reducing the amount of exposed dust producing surfaces.	С	 The area of disturbance as of 20 April 2024 was 597.4 ha. Land clearing is conducted to minimise the area of active disturbance to the extent required for short-term construction activities. Records of clearing are maintained in LADP system. The extent of clearing in relation to current development areas indicates that excessive clearing was not conducted in relation to current development areas. Clearing minimisation is conditioned in the LADPs and land clearing cannot commence until an approved disturbance layer is issued, taking into consideration the design requirements and approved disturbance footprint under the Mining Proposal for mine activity categories.
			Machinery would be maintained in accordance with original equipment manufacturers (OEMs) requirements to minimise nuisance noise Where necessary equipment would be enclosed to reduce nuisance noise	NR	 All construction equipment is contained in accordance with OEM requirements and verified during daily machinery pre-start activities. No noise complaints have been received to date. Enclosure of equipment has not been deemed necessary for the construction phase.
		Noise	Airstrip would be oriented to ensure cultural heritage sites are not within the approach and take-off angles unless otherwise agreed with Ngaanyatjarra Council.	С	Design of airstrip has taken the location of cultural heritage sites into consideration.
			Equipment design would be specified to be within Australian Standard noise limits.	С	 In the current construction phase, all earthmoving and construction equipment are specified to comply with applicable noise restrictions and relevant Australian Standards. For the operational phase, the Basis of Design document for Mineral Processing Plant dated 8/08/22, updated 23/11/22 (versions A & B), section 6.4 addresses noise requirements and references WM-0000-ENG-DES-0003 design criteria for mechanical equipment.
			Permanent landforms such as WRDs and TSFs would be similar in height to surrounding natural landforms (e.g. <60 m)	NR	Project in construction phase, Project design has taken this into consideration
		Visual Amenity	Progressive rehabilitation would be undertaken on disturbed areas as they become available	NR	Project in construction phase. Progressive rehabilitation commences when disturbed areas (whether in construction or operation) are no longer needed.
			Wind turbines and masts would be removed at closure, or as agreed with the Ngaanyatjarra Council	NR	Project in construction phase
			Lights would be strategically placed and designed to shine towards plant operations and minimise light spill to the environment	NR	Project in construction phase



CHMP Reference	Element		Requirements		Evidence
1.7.1.4	Indirect Impacts Table 5: Mitigation Measures for the Indirect Impacts to Cultural Heritage	Lighting	Design of lighting arrangements with consideration to AS4282-1997: Control of the obtrusive effects of outdoor lighting.	С	 The fixed lighting installations or mobile equipment lights associated with construction activities are not visible from nearby communities nor are impacting the nearby ethnographic sites. For Operation: Basis of Design document for Mineral Processing Plant dated 8/08/22, updated 23/11/22 (versions A & B). References WM-0000- ELE-SPE-0011 Lighting Design and Installation. Impacts of outdoor lighting on ethnographic sites from operations is mitigated by an appropriate placement and orientation of lighting and placement of infrastructure to obstruct light pollution. There are no affected communities in the vicinity of the project.
			Before arriving at the final lighting design, consideration would be given to alternative lighting systems with respect to their capability of fulfilling both the functional and environmental design objectives	NR	Project in construction phase. Functional and environmental design objectives have been considered, including use of solar lighting at the aerodrome
			When there is some flexibility about where an illuminated area/activity can be sighted, it would be located and oriented where it would have the least effect on cultural heritage sites, taking into account any screening which may be provided by the surrounding topography or other physical features such as trees or sand dunes	NR	Project in construction phase. There are no affected communities in the vicinity of the project and cultural heritage sites are generally located away from active work areas.
			The selected light fixtures would have a light output distribution appropriate for the application and would not emit excessive light outside the property boundaries	NR	Project in construction phase. There are no affected communities in the vicinity of the project.
			Louvres, baffles or shields or the like will be added to floodlights to control spill light where this did not significantly influence the performance of the lighting system	NR	Project in construction phase. None of the current fixed lighting installations or mobile equipment lights are visible from nearby communities nor are impacting any ethnographic sites and there is no need to install any louvres, baffles of shields.
			Floodlight locations are often determined by the nature of the activity for which the lighting is provided. Small departures from the recommended positions will be considered if this results in a greater degree of control of the spill light	С	Project in construction phase. Floodlights are maintained in recommended positions when utilised.
1.7.1.4	Indirect Impacts Table 5: Mitigation Measures for the Indirect Impacts to Cultural Heritage	There will be no impact to water holes (water quality and water levels) at the Pilpirrin cultural heritage site, or any other cultural heritage sites as a result project-related activity	С	 The project is in construction phase. This condition is unable to be monitored directly due to the culturally sensitive areas referred to here. To satisfy this condition, it would require a proxy data point, or feedback from Ranger group. Irrespective, drawdown from mining or construction is not triggered yet due to limited water abstraction. The Project footprint is located away from the Pilpirrin cultural heritage site to prevent water quality impacts during construction. Limited groundwater abstraction has occurred during reporting period. 7.99% of Licence allocation. At these volumes the risk of impacts on 	
		Ngaanyatjarra Social and Cultural Surroundings	OZ Minerals will report to the Ngaanyatjarra Council any environmental management exceedance, event or trend of concern that may indicate any environmental management issue, upon OZ Minerals becoming aware of the exceedance, event, or trend, and will send to the Ngaanyatjarra Council any report and correspondence relating to that exceedance, event or trend at the same time it is sent to other third parties (e.g. government regulators).	С	water levels at proximate water holes is considered low. Any environmental management exceedance, event or trend of concern that may indicate any environmental management issue is raised with NgC during the regular environment and approvals meeting with BHP as well as the Heritage and Liaison Committee. NgC are provided with details of all noncompliances reported to regulatory authorities.
		our our unings	OZ Minerals will notify the Ngaanyatjarra Council of any regulated changes to WMP Environmental Management Plans and collaborate with the Ngaanyatjarra Council in the drafting of those changes	С	The Weed Management Plan and Feral Fauna Management Plans are being developed in consultation with the NgC.
			OZ Minerals will convene and resource a Cultural Heritage Management Decision Making Committee (CHMDC) (Section 3.3.3) and other meetings of Ngaanyatjarra Senior Knowledge Holders and Traditional Owners as they may be required from time to time (as notified by the Ngaanyatjarra Council or OZ Minerals)	С	 The Heritage and Liaison Committee as per the Mining Agreement has been performing this role however the CHMP is currently under review. Heritage Committee is currently being discussed through the revision of the CHMP. The Minutes of the Heritage and Liaison Committee meetings for the reporting period are maintained in a secure folder within the BHP document management system. In addition to this, the Oversight Committee, consisting for 30 senior knowledge holders, at least twice a year to discuss heritage impacts and other topics and includes WMP community open days. Details of the Oversight Committee meetings are maintained in a secure folder within the BHP document management system. The last meeting was conducted in May 2023 with an Open Day held in October/November 2023.



CHMP Reference	Element	Requirements	Compliance Status	Evidence
1.7.1.4	Indirect Impacts Table 5: Mitigation Measures for the Indirect Impacts to Cultural Heritage	OZ Minerals will invite Ngaanyatjarra People, through the Ngaanyatjarra Council, to undertake environmental monitoring across all phases of the WMP. If this invitation is accepted, OZ Minerals will pay for this monitoring on agreed fair and reasonable commercial terms.	С	 Ngaanyatjarra people have participated as monitors in environmental activities including dust monitoring, water bore monitoring, weed surveys and great desert skink surveys. Ngaanyatjarra people have also participated as monitors during land clearing activities as required under the Land Access and Disturbance process. During the reporting period 120 different monitoring events were conducted, involving 349 (non-unique) Traditional Owners and 3028 monitoring hours. The Indigenous Ranger Program is based in Jameson and was established in June 2023. The Ranger team has been participating in environmental surveys and monitoring activities within the WMP. BHP is actively exploring opportunities for further engagement around seed collection, weed management, monitoring activities and rehabilitation with the aim to encourage development of indigenous businesses on the lands.
		A program of 'cultural geography' will be commissioned with the Ngaanyatjarra Council and Traditional Owners to characterise the cultural landscape beyond ethnographic sites of importance. This work may include the identification of graves, location of contemporary family connections, further research into the locations of dreaming trails and a deeper appreciation for cultural associations and practices performed in the West Musgrave area. This work will be done to inform chance find protocols, micro siting of infrastructure and provide a body of knowledge that will be used to inform cultural amenity impact offset strategies.	С	Mining Agreement provides for funding for the cultural geography project. As per the Heritage Committee meeting minutes of 24/4/2024 the Scope of Works is still under development by the NgC. The timeframe for implementation will be determined by the NgC.
		Attaining the Ngaanyatjarra People's consent to mine will follow the requirements of the WMP: Negotiation Process Agreement and follows that the Mining Agreement (once in effect) will set out the terms and conditions, including compensation, on which YNP and the Land Council consent to the development and operation of the Nebo-Babel Mine on the existing mining tenements and on any other mining tenements that may be granted in the Exploration Area and the Miscellaneous Licence Area.	С	Mining Agreement has been entered into by OZ Minerals and NgC, effective 22 September 2022 and sets out the terms of agreement for mining on the WMP tenements and within the Mining Agreement area.
		OZ Minerals will, with the involvement of the CHMDC, maintain and meet its obligations pertaining to the protection and management of cultural heritage and the environment through a register of obligations.	С	A Heritage obligations register has been derived from the overall project obligations register and has been made available to the NgC via the Mining Agreement Implementation Manager. Records of correspondence are maintained within the BHP document management system.
		OZ Minerals will comply with the Ngaanyatjarra Council's CHMP, Revision O, dated 18 October 2021.	С	 Mining Agreement was finalised and signed on 22 September 2022. The Agreement requires an update of the October 2021 NgC CHMP appended to this CHMP, which is still in progress. The Mining Agreement provides funding for six NgC full time equivalent roles to support the Ngaanyatjarra Council to engage with the WMP and
		OZ Minerals will continue to meet with and resource the Ngaanyatjarra Council and the Ngaanyatjarra People (as directed in the Mining Agreement (once in effect)) to regularly discuss the WMP, the impacts that have and may arise from the WMP and the actions required to mitigate and manage those impacts.	С	implement the Mining Agreement. During the reporting period, the following roles were filled: CHMP Coordinator, Operations Manager with the Business Development role vacant, however a Business Development role has recently been appointed and will start in June 2024. Regular meetings including joint governance (Liaison, Heritage, and
				Oversight Committees) and topic-specific meetings (environment/approvals, heritage, social impact, contracting, road safety etc.) are held between BHP and NgC to mitigate actions and manage impacts. • Many of the requirements of the NgC CHMP have been incorporated into the EPA approved CHMP. Compliance with the EPA approved CHMP is
				 The NgC CHMP revision to incorporate the Mining Agreement clauses, as per the commitments in the overarching CHMP, is currently under revision by NgC.



CHMP Reference	Element	Requirements	Compliance Status	Evidence
1.7.1.4	Indirect Impacts Table 5: Mitigation Measures for the Indirect Impacts to Cultural Heritage	To mitigate against the risk of perceived impacts to cultural association and aesthetics, OZ Minerals will design and implement monitoring programs, jointly with Ngaanyatjarra People and the Ngaanyatjarra Council, to establish baseline environmental data so that if an impact concern is raised by Ngaanyatjarra People or the Ngaanyatjarra Council, that evidence can be provided as to why that impact event was not caused by the WMP. For example, if Ngaanyatjarra People perceive that water levels and/or water quality at a particular heritage site outside of the Development Envelope has been impacted by the WMP, evidence can be provided, as jointly obtained with Ngaanyatjarra People, as to why such an impact would likely not have arisen from the WMP	C	 Monitoring for groundwater, flora, vegetation, and fauna is described in the approved GMMP, FVMP and TFMP respectively. NgC provided input to each of the plans prior to approval by the EPA. Monitoring results for groundwater, dust, flora and vegetation, weeds and fauna monitoring are made available to the NgC following monitoring events and is discussed during Heritage and Liaison Committee and regular environmental and approvals meetings between NgC and BHP. Meeting minutes are maintained in the BHP document management system. The Indigenous Ranger Program is based in Jameson and was established in June 2023. The Ranger team has been participating in environmental surveys and monitoring activities within the WMP. BHP is actively exploring opportunities for further engagement around seed collection, weed management, monitoring activities and rehabilitation with the aim to encourage development of indigenous businesses on the lands.
		A grievance system will be developed jointly with the Ngaanyatjarra Council to assist with documenting, investigating and responding to complaints made by community groups and stakeholders, and all stakeholder issues and concerns will be proactively addressed. The grievance system will be reviewed as part of the CHMDC standing agenda and records of material grievances included in the annual WMP Compliance Assessment Report.	С	 In accordance with the Mining Agreement a Stakeholder Engagement Program has been prepared and includes a description of the grievance mechanism in relation to cultural heritage that was jointly developed between NgC and BHP. The plan has been developed and is used to manage grievances; the plan is currently under review by BHP. The grievance handling mechanisms implemented by the WMP complies with Section 3.2.7 of this CHMP and the requirements of the BHP, Western Australia Operations Community Complaints Procedure (WA Communities, Number 0072027, Version 11). During the reporting period no grievances were lodged by the Ngaanyatjarra People or any other party.
3.1	Methods for Pre- Clearance Surveys	A revision to this CHMP will be made following the completion of the Mining Agreement to include any changes or updates to the process for pre- clearance surveys.		The CHMP is currently under revision by BHP and the NgC following the Mining Agreement signing in 2022.
		To protect areas of significance, OZ Minerals must request clearance from the Ngaanyatjarra Land Council before proceeding with any works (which have not already been screened and cleared for a particular activity). The form of the request to the Ngaanyatjarra Land Council would come in the form of a formal heritage request, and must include: • Maps, plans and photographs where appropriate • Proposed means of access and locations of access for people and equipment • The location where work will be conducted and an estimated timeframe, scope and techniques to undertake the activity • The items of equipment to be used • Details of the location, and structures that may be erected • The identity of any contractors that may be used and minimum and maximum numbers of people to be involved, including their roles. Following the receipt of notice, the Ngaanyatjarra Land Council and OZ Minerals will undertake (at an agreed expense covered by OZ Minerals) the organisation and implementation of a screening/clearance program by the Scouting Team of the required areas. The tasks of the scouting team may include: • Determine whether proposed activities are likely to damage, disturb or encroach upon or interfere with areas of significance. • Provide OZ Minerals advanced warning to enable relocation of work areas to avoid sites of significance. • To make every reasonable endeavour to proceed with the work at a rate that will avoid standby.	C	 Preclearance surveys are undertaken prior to an approved Permit to Work being issued by NgC in accordance with the requirements of the Mining Agreement. Further to this infield consultation with TOs are undertaken in areas outside the PtW1. Since the conclusion of the Mining Agreement and the subsequent approval of Permit to Work (PtW) 1 (Main Areas) and Permit to Work 2.1 (ancillary areas and studies), that contain the information required by this condition, the request for clearance to enter and disturb an area has been incorporated into the West Musgrave Land Access and Disturbance Request (LADP) process. For areas where comprehensive heritage clearing has been completed (PtW1) the NgC is kept informed of new LADPs, whereas in the PtW 2.1 NgC form part of the approval workflow and are required to perform in-situ monitoring of clearing/ disturbance activity, as conditioned in the Mining Agreement, Permit to Work and LADP. The NgC and West Musgrave team meets weekly to discuss general environment and heritage related items, including new land access and disturbance requirements, that forms part of a "three week lookahead" NgC is provided with a three month lookahead that describe upcoming and ongoing LADP works each month, with accompanying maps, as well as a five week lookahead that incorporates LADP proposed and ongoing as well as planned activities and traffic movements to WMP, with accompanying maps. NgC heritage monitors are required to attend first ground disturbance activities in accordance with the Mining Agreement, Permit to Work and LADP conditions.



CHMP Reference	Element	Requirements	Compliance Status	Evidence
		The scouting team shall consist of the following: Two anthropologists employed or engaged by the Ngaanyatjarra Land Council and agreed to by OZ Minerals A Ilaison officer engaged by the Ngaanyatjarra Land Council Four male and four female Traditional Owners (total of eight): or as otherwise agreed between the parties. The supervising anthropologist shall be responsible for the coordination of the scouting team. OZ Minerals shall appoint a representative to work in association with the scouting team, whose duties include: Accompanying the scouting team to the proposed work areas Identifying the relevant work area locations Providing suitable maps of proposed work areas Relocating infrastructure as needed to avoid significant areas. Communicate with the Ngaanyatjarra Land Council's supervising anthropologist. The Ngaanyatjarra Land Council's appointed supervising anthropologist is duties include: Identifying appropriate Traditional Owners to accompany the scouting team. Coordinate the work of the scouting team. Coordinate the work of the scouting team and the scouting tea	C	 Mining Agreement was finalised and signed on 22 September 2022. Preclearance surveys are undertaken prior to an approved Permit to Work being issued by NgC in accordance with the requirements of the Mining Agreement. Pre-clearance surveys are conducted in accordance with the scouting team requirements. Further to this infield consultation with TOs are undertaken in areas outside the PtW1. All LADPs within Permit to Work Area 1 are issued to Ngaanyatjarra Council for information. LADPs within the Preparatory Permit to Work 2.1 are issued fourteen (14) days prior to the proposed date of commencement of works, with works associated with high impact activities requiring approval by NgC before proceeding. These LADP's are discussed during the weekly NgC-BHP Environment and Heritage meetings and records of discussions and planning are contained in the minutes, as maintained in BHP document management system. Following review by the NgC appointed anthropologist, a team of traditional owners and their representatives are invited to participate in scouting work. Where required, the outcome of the scouting work is used to refine footprints to avoid identified heritage values. Heritage monitors are invited to monitor ground disturbing activities to ensure the protection of sensitive areas is acceptable. During the reporting period 120 monitoring events, involving 349 Traditional Owners and 3028 monitoring hours were conducted. It is noted that the CHMP requires revision to ensure the pre-clearance survey method agreed between BHP and NgC is accurately described and reflects the updated provisions contained in the Mining Agreement. The CHMP is currently under review by the NgC.
3.2.1	Register or Sites	In collaboration with relevant cultural heritage custodians, a register of identified tangible cultural heritage features and intangible cultural heritage features and values within the project area will be developed and maintained.	С	 All identified tangible and intangible heritage values' spatial data is maintained in the WMP spatial database as exclusion zones and an exclusion zone register is maintained in Aconex. The Exclusion Zone Register was last updated 8/12/2023. All identified tangible and intangible heritage values within the development envelope are physically delineated using pink and black zebra capped fence droppers, with the locations confirmed using survey methods. The pegs are situated on the buffer area around the heritage values to ensure protection of the value. Heritage marker locations are pegged and are current on the WMP spatial database as of May 2024. LADPs ensure avoidance of heritage locations through automated geometry screening to ensure avoidance and conditions applied through the LADP. The pegged heritage areas map was last updated May 2024.



CHMP Reference	Element	Requirements	Compliance Status	Evidence
3.2.2	Land Disturbance Permit and Permit to Work Process	The Land Disturbance Permit (LDP) and Permit to Work (PTW) process will be implemented.	С	 In accordance with Mining Agreement, finalised September 2022, Project Operations cannot proceed without a Permit to Work in place. Permit to Work 1 and 2.1 issued by NgC 2023, compliance implemented and monitored via LADP system. NgC issues Permit to Work authorisation for specific areas based on applications made by BHP. BHP internal process then requires approval of a LAPD prior to any physical on-ground works occurring. The process is consistent with Mining Agreement requirements.
3.2.3	Ngaanyatjarra Monitors	Up to two monitors will be invited to be present when ground is disturbed for the first time, and to help physically demarcate approved work areas prior to the commencement of works. In addition, Ngaanyatjarra monitors will be stationed at land disturbance activities where there is high risk of cultural heritage material, as deemed necessary by OZ Minerals and the Ngaanyatjarra Council, to ensure that clearing and other activities are done in accordance with agreed heritage report requirements, to manage chance finds and to manage other heritage related risks. The Ngaanyatjarra Council has acknowledged that this monitoring may be impractical to implement due to the availability of Ngaanyatjarra People to perform these duties and other constraints. As such, while there is strong intent to implement this monitoring program, the involvement of Ngaanyatjarra monitors is not a strict compliance requirement, however, inviting Monitors to attend is expected.	С	 Requirement to ensure heritage monitors are present during first ground disturbing activities is implemented through LADP system. Notification of upcoming monitoring opportunities is communicated via three week monitoring lookahead, as well as three month and five-week LADP lookaheads issued to NgC. Invitation to participate to monitor made verbally over the phone to NgC Liaison Officers, or NgC, or in person in the community. Daily monitoring information is recorded on a sign in sheet that is completed when monitors accept an invitation to participate. Sign in sheets are maintained in the BHP document management system. During the reporting period a total of 120 sign in sheets were completed. 349 (non-unique) Traditional Owners participated in monitoring events, comprising a total of 3028 monitoring hours. A Cultural Heritage Monitoring Procedure is under review and will be implemented in the next reporting period.
3.2.4	Chance Find Protocol	Through the course of land disturbance activities, sites that have not been previously identified in organised cultural heritage surveys may be encountered or become exposed through the process of excavation. These may include artefacts, skeletal remains or other manifestations of the fulful protect of the protect of th	С	 Chance finds awareness training program PowerPoint presentation forms part of the induction material for every person coming to site. Chance find requirements are communicated via LADPs, chance find posters located throughout West Musgrave offices and work areas. LADP induction and pocketbook communicate chance find requirements to all personnel. A draft Chance Find Procedure has been developed and it is currently under review by NgC. Four chance finds were made during the reporting period, all of which were reported to the NgC and managed in accordance with the chance find procedure. They were: Discovery of an isolated artefact during the clearing of the southernmost Northern Access Road truck turnaround areas on 30 June 2023. The find was reported by phone to the NcG Mining Agreement Implementation Manager. Senior knowledge holders attended the chance find location and relocated the artefact to outside the disturbance footprint. Its final location was pegged, and the spatial data recorded in the WMP spatial database. Identification of a potential calcrete rock hole during test pit excavation within the proposed TSF footprint on 28 November 2023. Following discovery, the hole was excavated by Ngaanyatjarra monitors that were attending the excavation work and the site was demarcated with tape and senior knowledge holders notified. A 50 m exclusion area was demarcated around site. The TSF was redesigned to avoid the site. The NgC subsequently attended the site and, after further consultation, advised that this is not a cultural heritage site. Discovery of an artefact scatter consisting of approximately 40 stone artefacts. The find was reported using the chance find reporting form and was observed by a number Ngaanyatjarra observers. It has been surveyed and recorded in the WMP spatial database. Discovery of a potential stone artefact during a great desert skink survey on 15 February



CHMP Reference	Element	Requirements	Compliance Status	Evidence
3.2.5	Training and Competency	OZ Minerals, in consultation with relevant Ngaanyatjarra stakeholders, will coordinate the development of a cultural induction program and a cultural awareness program.	С	 The cultural induction program forms a module in the online induction process. NgC still developing their own induction program. The BHP induction material is being used in the meantime. Chance finds awareness training program PowerPoint presentation forms part of the induction material for every person coming to site. Chance find requirements are communicated via LADPs, chance find posters located throughout West Musgrave officer and work areas. LADP induction and pocketbook communicate chance find requirements to all personnel.
		A Cultural Induction Program will be delivered to all workforce attending the WMP. The content of the cultural awareness training will be coordinated by OZ Minerals in consultation with the appropriate knowledge holders, and may include: • The significance of cultural heritage to Ngaanyatjarra stakeholders • Relevant cultural heritage legislation • Obligations under this CHMP and Mining Agreement, specifically their responsibilities regarding the protection of identified cultural heritage sites and chance finds. • Types of cultural heritage objects and how to identify them. • Procedures for reporting new cultural heritage sites and objects. A Cultural Awareness Training program will be delivered to all members of the workforce associated with the WMP. The content of the cultural awareness training will be developed in consultation with the appropriate knowledge holders, nominally the Cultural Awareness Program may include: • Cultural awareness • The significance of cultural heritage to Ngaanyatjarra stakeholders • Relevant cultural heritage legislation • Obligations under this CHMP and Mining Agreement, specifically their responsibilities regarding the protection of identified cultural heritage sites and chance finds. • Types of cultural heritage objects and how to identify them. • Procedures for reporting new cultural heritage sites and objects. A broader understanding of Aboriginal history and the impacts of colonisation, historical legislation and key events that have impacted on Aboriginal societies. OZ Minerals recognise the importance of Ngaanyatjarra People's role in communicating how they want their cultural heritage and culture managed as such Ngaanyatjarra People will be invited to participate in the delivery of cultural awareness training (subject to fair and reasonable commercial terms).	C	 A cultural Induction Program has been developed by BHP. All employees, contractors and visitors are required to complete prior to allowance to work on site. Records are maintained within the PeopleTray system. Chance finds awareness training program PowerPoint presentation forms part of the induction material for every person coming to site. Chance find requirements are communicated via LADPs, chance find posters located throughout West Musgrave officer and work areas. LADP induction and pocketbook communicate chance find requirements to all personnel. A cultural awareness training program was developed by NgC. Its implementation involves conduct of 1-day Bush Trips guided by community members of NgC and delivered to senior members of BHP workforce. Participants spend one day on country for cultural familiarisation, appreciation, and awareness. During the reporting period four bush trips were attended by 48 West Musgrave attendees and 158 (non-unique) Traditional Owners. That brings the total since project commencement to six bush trips comprising of 72 West Musgrave attendees and 205 (non-unique) Traditional Owners. The requirements of the Cultural Awareness Training program are also addressed through the Cultural Induction Program developed by BHP. All employees, contractors and visitors are required to complete prior to allowance to work on site. Records are maintained within the PeopleTray system. Chance finds awareness training program PowerPoint presentation forms part of the induction material for every person coming to site. Chance find requirements are communicated via LADPs, chance find posters located throughout West Musgrave officer and work areas. LADP induction and pocketbook communicate chance find requirements to all personnel.



CHMP Reference	Element	Requirements	Compliance Status	Evidence
3.2.6	Demarcation of Sites	Work Areas: Physical demarcation (where necessary) of work sites will take the form of installing visible markers at regular intervals, so that the boundary of approved work areas can be easily ascertained, and to ensure that no encroachment into identified cultural heritage exclusion zones occurs. Parcation of Sites		 Heritage sites are physically identified in the field with pink and black pegs installed by survey methods and the pegged locations form a layer in the BHP spatial database for monitoring and reporting purposes. Note Permit to Work system only applies within the Mining Agreement area for the purposes of Project Operations, a number of 'nominated roads' are permitted for use by BHP outside of the Mining Agreement area to access more remote areas of the Development Envelope (i.e. Northern Borefields and Power Package areas) All identified tangible and intangible heritage values within the development envelope are physically delineated using pink and black zebra capped fence droppers, with the locations confirmed using survey methods. The pegs are situated on the buffer area around the heritage values to ensure protection of the value. Heritage marker locations are pegged and are current on the WMP spatial database as of May 2024. LADPs ensure avoidance of heritage locations through automated geometry screening to ensure avoidance and conditions applied through the LADP.
				The pegged heritage areas map was last updated May 2024.
		Identified Cultural Heritage Sites: In-field demarcation of cultural heritage sites and places of high cultural value will only be demarcated in accordance with the wishes of Traditional Owners (and as documented in Ngaanyatjarra issued cultural heritage survey reports), or upon advice from relevant Traditional Owners or knowledge holders.	С	Cultural heritage exclusion zones and heritage marker locations are maintained on the WMP spatial database. Locations of heritage markers are in accordance with exclusion zones associated with cultural heritage locations and are communicated to NgC via Aconex (document transmittal system) and the dedicated NgC webmap.
				NgC are informed of pegging activities in the three-week monitoring lookahead and invited to attend.
				All identified tangible and intangible heritage values within the development envelope are physically delineated using pink and black zebra capped fence droppers, with the locations confirmed using survey methods. The pegs are situated on the buffer area around the heritage values to ensure protection of the value.
				Heritage marker locations are pegged and are current on the WMP spatial database as of May 2024. LADPs ensure avoidance of heritage locations through automated geometry screening to ensure avoidance and conditions applied through the LADP.
				The pegged heritage areas map was last updated May 2024.
		In the event of a non-compliance with the requirements of this CHMP resulting from monitoring activities or legitimate complaint from a Ngaanyatjarra community member the following incident investigation process will be implemented:	С	A breach of the CHMP Golden Rules occurred 27 March 2024 and involved the following:
		The OZ Minerals representative will notify the Ngaanyatjarra Council (nominally the General Manager for Land and Culture) as soon as reasonably possible with details of the incident or complaint (within 12 hours)		An excavator operated under guidance was returning from test pitting at the solar array phase 1. The excavator travelled along a non-nominated road within an exclusion zone and outside of the Mining Agreement to return to
	Incidents, Issues,	Depending on the seriousness of the incident or claim, OZ Minerals and the Ngaanyatjarra Council may jointly investigate the incident (a decision to be confirmed by Ngaanyatjarra Council; nominally the General Manager for Land and Culture)		the Central Mining Area. The event is considered a non-compliance to the Mining Agreement. There was no environmental damage outside of the
3.2.7	Complaints and Grievance	Where required, OZ Minerals and the Ngaanyatjarra Council will jointly investigate the incident within 48 hours and a report will be issued within 60 hours of receiving the initial incident notification.		footprint of the well-formed road. In terms of failed controls that led to the event, the track was signposted with 'no-access' signage at both ends;
		The progress of the investigation will be communicated on a daily basis to other people as nominated by the Ngaanyatjarra Council and OZ Minerals		however, signage was missing from one end (star pickets still standing in place). Signage for these tracks is installed adjacent to the track (rather than
		Immediately after issuing the investigation report, corrective actions will commence to improve processes to mitigate the risk of another incident.		hard barricading) to ensure continued community access to utilise the road(s).
		 another incident If negligence or purposeful misconduct is identified through the incident investigation disciplinary action may be taken In addition, an issues, complaints and grievance system shall be developed to assist with documenting, investigating and responding to complaints made by community groups and stakeholders, and all stakeholder issues and concerns will be proactively addressed. 		This event also constitutes a breach from the Golden Rules (#2) in that a designated transport area was left.
				The event was first reported to the NgC in a telephone call by the General Manager, West Musgrave Operations to the CEO Ng Council, in April 2024 when the event was detected.
				The following immediate actions were taken:
				 All works associated with regional ground disturbance ceased (e.g. borefields, power package, rehabilitation and TSF) whilst the investigation was in progress and so that an audit of no-access signage



CHMP Reference	Element	Requirements	Compliance Status	Evidence
				 throughout the development area could be completed. The audit of regional signage identified additional areas, where signage installed as required. Escalation process undertaken and full ICAM investigation initiated. As a result of the BHP ICAM investigation detailed corrective actions were identified to prevent a recurrence of the event. These actions have been raised in the BHP event management system to ensure tracking and close out and include: Ensuring all personnel are aware of the requirement to obtain approval for proposed paths used to access work areas before commencing works under an LADP NgC consultation re possible hard barricading Improvements to the RightStep geofencing system Expediting completion of the East-West access road A quality review of implemented actions 30 days after close-out. The full investigation is ongoing, following BHP's findings NgC have been provided with further opportunity to review and provide input to the suitability of the actions and further consultation with the community.
3.2.9	Compliance Register	OZ Minerals will maintain a compliance register detailing all legislative commitments that OZ Minerals has made in relation to cultural heritage management, this will include any requirements stipulated in a Ministerial Statement relating to this CHMP, any regulatory conditions associated with subsequent mining approvals, the future Mining Agreement (and associated annexes, including the Ngaanyatjarra Council CHMP) and any recommendations made in cultural heritage surveys that are signed and countersigned by relevant parties.	С	A Heritage obligations register has been derived from the overall project obligations register and has been made available to the NgC via the Mining Agreement Implementation Manager and shared document managed system. Records of correspondence are maintained in SharePoint.
3.2.10	Information Management	Geospatial data and other information pertaining to the location of exclusion zones and areas cleared for work will be maintained and document controlled in a document control system (Aconex or equivalent). All data generated as part of this CHMP will also be document controlled in a document control system (Aconex or equivalent). It is noted that data pertaining to cultural heritage is of a confidential nature, and as such will only be made available to nominated persons within OZ Minerals who have signed confidentiality statements.	С	 Heritage exclusion zone data and other data generated as a result of the implementation of the CHMP and Mining Agreement are controlled in Aconex and exclusion zones issued to ensure avoidance of heritage locations. Attributes are removed when issuing exclusion zone data to Contracting partners. Last Heritage Exclusion Zone Data update in Aconex was 12/2023. Heritage data maintained in the BHP document management system is access restricted to maintain confidentiality.
3.2.12	Support for Cultural Maintenance Activities	Compensation and offset provisions to manage impacts to cultural amenity and cultural associations will be further developed as part of the Mining Agreement between the Traditional Owners, the Ngaanyatjarra Council and OZ Minerals	C	 The Mining Agreement signed September 2022 provides a comprehensive package of compensation and engagement opportunities to offset impacts to cultural amenity and cultural association. These include funding for: An Indigenous Ranger Program based in Jameson. A cultural geography project to explore and document cultural associations with the impacted area. A demography project to monitor social and cultural impacts of the Project. This is currently work in progress and involves a door-to-door census throughout the Ngaanyatjarra lands. A range of NgC positions to support successful implementation of the Mining Agreement and management and mitigation of Project impacts. Community projects including the construction of a Jameson based community facility, and re-location of community amenities. Support for employment/training and business development. Employment pilot program implemented in early 2023 with two community members employed during the reporting period. There are currently no community employees working at WMP, but the next round of recruitment and employment is under planning. Annual social investment funding to be jointly allocated by the NgC, Ngaanyatjarra People and the Company. Following two rounds of Social Investment proposals, funds have been approved for community projects, and additional funds available in Social Investment Funds, of which a portion is set aside for the development of a community meeting place in Jameson. Further consultation is required for the proposed location and to develop the project scope.



CHMP Reference	Element	Requirements	Compliance Status	Evidence
3.3.1	General - Communication	OZ Minerals will provide ongoing, regular and timely communication to the Ngaanyatjarra People about the WMP.	С	Ongoing communications with the NgC is provided in the following forums: Heritage and Liaison Committee Oversight Committee Meetings Portnightly Environment, Approvals Meetings Fortnightly Heritage Meetings Regular informal phone and email communications Fortnightly WMP General Manager and NgC CEO meetings. Three week monitoring lookahead. Three-month LADP proposed and ongoing works lookahead Five-week LADP proposed and ongoing works lookahead including forecast traffic movements and project updates. Monitoring, infield consultations and site tours with Ng People. Enhancement of in-field monitoring opportunities for community members located at communities more remote from the WMP is currently being explored with NgC
3.3.2	Consultation Register	A consultation register will be maintained to record specific consultation activities relating to cultural heritage protection, incidents or otherwise. This consultation register will include details of consultation activities undertaken, details of people consulted, details of consultation outcomes and any actions that arose as a result of that consultation event. The consultation register will likely form part of the 'incidents, issues, complaints and grievances' system and be reviewed at CHMDC meetings.	C	 Specific heritage events and notifications are maintained in the Heritage event and NgC notification register within the BHP document management system. Records of day-to-day communications are maintained in BHP document management system as separate monitoring sheets and infield consultation sheets. Records of in-field consultation and recommendations are maintained in the BHP document management system. Outcomes for monitoring and in-field consultation are presented during the quarterly Hertiage and Liaison committee meetings. Grievances and complaints are discussed during the annual Oversight Committee, who meet annually to discuss heritage impacts and other topics. Details of the Oversight Committee meetings are maintained in a secure folder within the BHP document management system.
3.3.3	CHMP Consultation	Central to consultation relating to this CHMP is the establishment of the CHMD or equivalent of relevant stakeholders. One role of the CHMDC will be to ensure the regular flow of information pertaining to the implementation of the CHMP (and other matters). The CHMDC will meet monthly unless otherwise agreed. In the event of a serious breach of the provisions of this CHMP, an emergency meeting of the CHMDC will be called. Consultation with CHMDC and other Ngaanyatjarra stakeholders to this CHMP will occur both at key milestones and at a schedule agreed by the CHMDC throughout the life of the project. These milestones include: • Change of project phases (exploration and studies, construction, operations and closure) • At an ongoing schedule to be agreed by the CHMDC (and as defined in the Mining Agreement) Ongoing through the incidents, issues, complaints and grievances process.	C	 The CHMD committee is called the Heritage Committee and functions as a subcommittee of the Liaison Committee as provided for in the Mining Agreement. The Committee includes three representatives of the Company and the Ngaanyatjarra people and four designated NgC representatives. The Committee is required to meet once per quarter during the Construction Phase and once every 6 months during the Production Phase. Meeting minutes are published within 10 business days of the meeting being held. During the reporting period, Heritage and Liaison Meetings were held in March, August and November 2023 and March 2024. The minutes of the meetings are maintained in the BHP document management system. In addition to this, the Oversight Committee, consisting for 30 senior knowledge holders, meets twice annually to discuss heritage impacts and other topics. Details of the Oversight Committee meetings are maintained in a secure folder within the BHP document management system. The last meeting was conducted in May 2023 with an Open Day held in October/November 2023



CHMP Reference	Element	Requirements	Compliance Status	Evidence
3.3.3	CHMP Consultation	Reporting of consultation outcomes will include: A record of meeting minutes of meetings relating to this CHMP. A nanual reporting to the Board of the Ngaanyatjarra Council by the CHMDC regarding the status of this CHMP The incidents, issues, complaints and grievance register All consultation records will be recorded in a document management system (e.g. Landfolio Land Management System, or equivalent). A nominal standing agenda for CHMDC Meetings relating to the management of cultural heritage (including this plan) includes: A pologies, confirmation of attendees, confirmation of minutes Health and safety Action review Review of LDPs issued, status etc. Chance finds, discovery of potential skeletal remains, Tjukurrpa event Incidents, breaches, concerns raised (including emerging environmental concerns, including the potential for compliance breaches) Review of Ngaanyatjarra Access Plan Compliance register review Confirmation of actions arising, allocation of tasks and due dates Other business, next meeting date The membership of the CHMDC may include: Senior Ngaanyatjarra cultural knowledge holders/traditional owners for the WMP area OZ Minerals most senior on-site manager OZ Minerals most senior on-site community relations advisor/manager Ngaanyatjarra Council General Manager Land and Culture (Ngaanyatjarra Council) and/or Ngaanyatjarra Council Principal Anthropologist (Ngaanyatjarra Council)		 Additionally, weekly meetings were held over the entire reporting period and ongoing to cover Environment and Approvals, and Heritage, alternating on a fortnightly basis. Records are maintained in the BHP document management system and circulated to NgC for review prior to finalising. Heritage and Liaison Committee Agenda is specified in the Mining Agreement. The agenda outlined in the requirement was followed at all Heritage and Liaison Committee meetings held during the reporting period. Minutes of the meetings are maintained in the BHP document management system. In addition to this, the Oversight Committee, consisting for 30 senior knowledge holders, meets annually to discuss heritage impacts and other topics. Details of the Oversight Committee meetings are maintained in a
40	OUMAD. D I	This CHMP will be reviewed annually (unless otherwise agreed by the CHMDC) following the signing of the Mining Agreement and prior to moving between project phases e.g. construction, operations and closure. This CHMP may also be reviewed should any of the following occur: Change of project phase e.g., construction to operation, and operations to closure If a significant incident occurs related to the protection of cultural heritage If the CHMDC request that a review is undertaken due to a relevant concern (subject to the outcomes of an incident/complaint investigation) Following completion of the Ngaanyatjarra Council's Cultural Geography Project If relevant State or Commonwealth legislation or policy requirements are updated or amended in relation to Aboriginal Heritage If the project scale and/or configuration changes in such a way that it materially changes the existing risk profile of the project and/or introduces additional potential impacts not previous considered/assessed. Any changes to this CHMP will involve consultation with the Ngaanyatjarra Council and may require approval from the EPA. Where requested by the CHMDC, this CHMP will be independently audited or peer reviewed to validate the effectiveness of this CHMP, and to make suggestions for improvement within the scope of the EP Act	C	meeting was conducted in May 2023. Heritage Committee has been developed. This includes three representatives of the Company and the Ngaanyatjarra people and three designated NgC representatives. The CHMP is currently under revision by the NgC and BHP to capture changes arising from the signing of the Mining Agreement on 23 September 2023.
4.2	CHMP - Review Independent Peer Review	make suggestions for improvement within the scope of the EP ACC	С	arising from the signing of the Mining Agreement on 22 September 2022 No request made for review. The CHMP is currently under revision by the NgC and BHP.



CHMP Objective Based EMP Audit Table

EPA Factors: Social Surroundings

Key Environmental Values: Cultural heritage sites, and to the degree possible the broader landscape in which these sites reside. Key Impacts and Risks:

- Direct and unauthorised impacts to cultural heritage sites (e.g. Tjukurrpa sites)
- Constrain or otherwise changes the nature of land access to cultural heritage sites or areas of the landscape used for customary uses by Traditional Owners
- Indirect impacts to cultural heritage sites through:
- o The deposition of unacceptable levels of dust.
- Reduced amenity associated with noise.

o Reduced amenity associated with noise.							
Management Action	Management Target(s)	Monitoring	Reporting	Compliance Status	Evidence		
 Management Objective: Avoid and minimise direct impacts to pote Comply with Ngaanyatjarra Council issued cultural heritage survey reports, the Ngaanyatjarra Council CHMP (Version O, 18 October 2021) and this CHMP. All currently identified cultural heritage exclusions zones have been excluded from the Development Envelope and as such direct impacts to these sites will be avoided unless otherwise agreed with the Ngaanyatjarra Council. Unless otherwise agreed with the Ngaanyatjarra Council, heritage sites will be avoided and will be demarcated by Ngaanyatjarra People, by way of invitation to the Ngaanyatjarra Council, or as requested by the Ngaanyatjarra Council. Demarcation will be done using highly visible 	ential cultural heritage sites Total project-related land disturbance is to be within the approved Development Envelope and not to exceed the approved area No unauthorised direct impacts to cultural heritage sites including archaeological sites. 100% compliance with the Ngaanyatjarra Council CHMP, Cultural Heritage	Monitoring Annual review of survey data and imagery All activities undertaken for the project must have an approved PTW or LDP defining allowable work areas before activities commence. Each PTW and LDP will clearly identify the work area and conditions under which the activities can be executed. These conditions will ensure compliance with	Internal Land Disturbance Register During construction a quarterly report (or similar, to be agreed with the Ngaanyatjarra Council) will be provided to the Ngaanyatjarra Council and CHMDC that includes maps showing cleared areas, PTW under application, PTW under activity, heritage cleared areas (or to be where a clearance request is pending), exclusion zones and cultural heritage sites, the Development Envelope and a list of live and pending tenements. Quarterly heritage clearance reconciliation reports to be provided to the Cultural Heritage Management Decision Making Committee		Land clearing for the reporting period is 259.8 Ha, bringing the cumulative clearing total to 597.4Ha The Mining Agreement was signed 22 September 2022, after which the CHMP required update (including the Ng CHMP included as an appendix to this CHMP. The CHMP is currently under revision by NgC. In accordance with Mining Agreement, finalised September 2022, Project Operations cannot proceed without a Permit to Work in place. Permit to Work 1		
 materials and where necessary physical barriers to avoid disturbance. Prior to the commencement of any clearing works, the Aboriginal Sites and Objects Register will be reviewed by OZ Minerals as part of the LDP process and applied, and a PTW will be sought and issued by the Ngaanyatjarra Council. OZ Minerals will appoint a Cultural Heritage Management expert for the duration of the project (prior to the commencement of construction until 3 months after the commencement of operations). As project definition increases, further site-specific cultural heritage surveys will be commissioned through the Ngaanyatjarra Council, to manage any uncertainties, and to ensure cultural associations are maintained and appropriate protection is afforded to cultural heritage sites. The development footprint and land clearance areas will be criented to avoid archaeological sites where 	Survey Reports and Ngaanyatjarra Council issued PTW (including any requirements for demarcation). Contract provisions for all OZ Minerals contractors will require compliance to this plan, and failure to comply will result in formal contractual consequences. Demarcation of cultural heritage sites to be maintained in good order. The cultural heritage management expert meets with the NgC General Manager of Culture and	 any directions given in the Mining Agreement (once in effect), Ngaanyatjarra Council issued cultural heritage survey reports and the Ngaanyatjarra Council CHMP. Compile and maintain records of invitation to the Ngaanyatjarra Council, and of Ngaanyatjarra People involvement in the monitoring activities as specified in this CHMP. Annual review of internal land disturbance register and spatial data against exclusion zones and the requirements of Ngaanyatjarra Council issued cultural heritage survey reports. No less than 20% of all issued LDPs are to be audited for those years where 	 (CHMDC) (Section 3.3.3) at their monthly meetings, and to the Ngaanyatjarra Council. Mining Rehabilitation Fund (MRF) annual reporting. Register of invitation to the Ngaanyatjarra Council, and of Ngaanyatjarra People detailing numbers of invitations to participate and numbers of people involved with specified monitoring and management activities. Where breaches of these management actions are identified, an event report will be developed and communicated with the CHMDC and Ngaanyatjarra Council with agreed remedial actions (Section 3.2.7). All events, issues and noncompliances will be maintained in a register that will be reviewed by the CHMDC as per the CHMDC standing agenda in Section 3.3.3. 		 and 2.1 were issued by NgC 2023, and compliance implemented and monitored via LADP system. Note, the Permit to Work system only applies within the Mining Agreement area for the purposes of Project Operations, a number of 'nominated roads' are permitted for use by BHP outside of the agreement area to access more remote areas of the Development Envelope (i.e. Northern Borefields and Power Package areas) NgC issues Permit to Work authorisation for specific areas based on applications made by BHP. BHP internal process then requires approval of a LAPD prior to any physical on-ground works occurring. The process is consistent with Mining Agreement requirements. Compliance with individual LADPs is verified monthly through Contractor Compliance Assessment 		
 be oriented to avoid archaeological sites where practicable. Convene and resource, on a monthly basis, or unless otherwise agreed with the Ngaanyatjarra Council, the Cultural Heritage Management Decision Making Committee (CHMDC) (Section 3.3.3). Where cultural heritage survey gaps exist, commission Ngaanyatjarra Senior Knowledge Holders and Traditional Owners, through the Ngaanyatjarra Council, to undertake heritage surveys prior to undertaking works (project works will be oriented around cultural heritage wherever possible). Implement the Ngaanyatjarra Council's Permit to Work (PTW) procedure. Record compliance within the WMP document control system (Aconex or equivalent). Project personnel do not undertake activities outside 	Heritage at least once per month. At least four meetings of the CHMDC are held annually, or otherwise as agreed by the CHMDC. Representative(s) from OZ Minerals senior executive (CEO and direct reports) and/or members of the OZ Minerals board of directors will meet with the CHMDC and/or Ngaanyatjarra People, the Ngaanyatjarra Council and Ngaanyatjarra Council Board members at	 Quarterly reconciliation of cleared areas and Development Envelope against Ngaanyatjarra Council issued cultural heritage survey reports and PTW during construction, and annually thereafter. Reports to provide details of any 'chance finds' and the subsequent actions taken. Reports to be signed off by WMP General Manager. Ngaanyatjarra People, through the Ngaanyatjarra Council, will be invited to participate in the reconciliation actions on fair and reasonable commercial terms. Joint environmental monitoring (OZ Minerals and Traditional Owners, 	 A summary of audit numbers will be provided in the WMP Compliance Assessment Report, and a description of any nonconformances to these management actions. Annual WMP Compliance Assessment Report (including a summary of the operation of the CHMDC and any material matters raised as they may be relevant to this CHMP) submitted to the EPA. OZ Minerals will provide the Annual WMP Compliance Assessment Report and all related environmental management and monitoring reports and associated raw data to the Ngaanyatjarra Council at the same time the report is sent to EPA. OZ Minerals will also provide any data and reports to the Ngaanyatjarra Council as 		 spreadsheets and on ground survey data. Both the monthly and quarterly validations serve as a reconciliation against approved disturbance areas (LADPs). WMP provides NgC with quarterly ground disturbance reconciliation PDF maps that are presented to NgC in the quarterly heritage oversight and liaison committee meetings. There have been no unauthorised direct impacts to cultural heritage sites including archaeological sites during the reporting period. As project definition has increased, further site-specific cultural heritage surveys have been commissioned through the Ngaanyatjarra Council for the Northern Borefields and future Northern Access Road, to manage any uncertainties, and to ensure 		



Key Environmental Values: Cultural heritage sites, and to the degree possible the broader landscape in which these sites reside. Key Impacts and Risks:

- Direct and unauthorised impacts to cultural heritage sites (e.g. Tjukurrpa sites)
- Constrain or otherwise changes the nature of land access to cultural heritage sites or areas of the landscape used for customary uses by Traditional Owners
- Indirect impacts to cultural heritage sites through:
- o The deposition of unacceptable levels of dust.

Management Action	Management Target(s)	Monitoring	Reporting	Compliance Status	Evidence
lanagement Objective: Avoid and minimise direct impacts to pot	l ential cultural heritage sites			Status	<u> </u>
designated work areas (ground disturbing or non-ground disturbing). Jointly with the Ngaanyatjarra Council, OZ Minerals will work towards developing and commissioning a geofencing system which ensures that work activities are undertaken within defined PTW areas and away from cultural heritage exclusion zones, unless otherwise agreed with the Ngaanyatjarra Council. Geofencing equipment will be checked as part of daily pre-start inspections and will be fully maintained. The efficacy of the geofencing system will be regularly assessed in consultation with the CHMDC. Up to two Ngaanyatjarra People will be invited to be present to monitor work activities when ground is disturbed for the first time, and to help physically demarcate approved work areas prior to the commencement of works. In addition, Ngaanyatjarra monitors will be stationed at land disturbance activities where there is high risk of cultural heritage material, as deemed necessary by OZ Minerals and the Ngaanyatjarra Council, to ensure that clearing and other activities are done in accordance with agreed heritage report requirements, to manage chance finds and to manage other heritage related risks. Monitoring will also be undertaken by Ngaanyatjarra People at other times when reasonably requested by the Ngaanyatjarra Council. Design, implement and review (at least annually), with the Ngaanyatjarra Council, a cultural heritage spatial data management system. Cultural heritage sexclusion zones, and/or areas considered at high-risk of containing cultural heritage sites, and related obligations, to be maintained in this spatial data management system for use in infrastructure design, layout planning, construction and operation. Should removal or destruction of archaeological and/or other cultural heritage sites be required it will be done in accordance with the wishes of the relevant Traditional Owners, the approval of the Ngaanyatjarra Council and in accordance with the WA Aboriginal Heritage Act (or as updated).	 Ngaanyatjarra People, through the Ngaanyatjarra Council, are invited to monitor all WMP work activities when ground is disturbed for the first time (unless otherwise agreed between OZ Minerals and the Ngaanyatjarra Council). Ngaanyatjarra People will be invited to participate in heritage and environmental monitoring on fair and reasonable commercial terms. Where specified in this Plan, OZ Minerals will facilitate Ngaanyatjarra People invitations to undertake monitoring. 	through the Ngaanyatjarra Council) of the WMP on agreed commercial terms, noting that joint monitoring may sometimes not be possible due to lack of availability of Ngaanyatjarra People. • Quarterly physical inspections, and or by other means, of the Development Envelope boundary, cultural heritage exclusion zones and cultural heritage site boundaries by Traditional Owners and the Ngaanyatjarra Council, arranged through the Ngaanyatjarra Council and resourced by OZ Minerals, unless otherwise agreed between the Ngaanyatjarra Council and OZ Minerals. • Review of any changes to, or noncompliances with, the WMP Heritage Commitments, Compliance and Obligations Table to be undertaken at each CHMDC meeting. This table will be jointly established by the Ngaanyatjarra Council and OZ Minerals. • OZ Minerals and the Ngaanyatjarra Council will audit WMP compliance with Ngaanyatjarra Council issued PTW conditions during and at the completion of the authorised works. • The CHMDC will discuss and monitor the effectiveness of the Management Actions (Table 7) and Mitigations (Table 5) and discuss and record lessons learned to support improved cultural heritage management practice across the life of the WMP. This will be a standing agenda item of the CHMDC.	reasonably requested by the Ngaanyatjarra Council. Ngaanyatjarra Council may also provide a report to the EPA pertaining to the operation of the Ngaanyatjarra Council's CHMP (however, it is noted that this is outside of the EPA's regulatory compliance requirements). Review and document the status of implementation of the indirect impact mitigation measures until such time as all the committed mitigation measures have been implemented or are otherwise considered no longer relevant by the Ngaanyatjarra Council.		cultural associations are maintained and appropria protection is afforded to cultural heritage site Amendments to the proposed design have occurre following these in-field consultation activities. A comprehensive, ongoing contractor audit prograw implemented in the reporting period and is progress at the time of reporting. To date the macontractors who are responsible for all infrastructuclearing activities have been audited and were four to be compliant with the LADPs relevant to their wo activities. Audit records are maintained in Aconex at the BHP event management system and were sighted on 25/3/2024. Through ongoing implementation the audit program 100% of LADP's will be audited each reporting period. The WMP LADP cascad relevant conditions of the NgC PtW down to the contractor level to ensure compliance with the conditions relevant to ground disturbing activities. A summary of audit numbers and actions raise following audits is maintained in the BHP eve management system and can be made available up request. Actions raised during audits are allocated at tracked to closure. Heritage sites are physically demarcated in the field Pegged heritage areas map is recorded as a layer the WMP spatial database and are identified in the field with pink and black pegs. To ensure avoidance of cultural heritage The We Musgrave Project (WMP) have developed at commissioned the RightStep Geofencing system the ensures work activities are undertaken within define Permit to Work areas, and away from cultural heritage exclusion zones, unless otherwise agreed with the Ngaanyatjarra Council. The RightStep system has been designed to notify vehicle operators and people of (such as during environmental and heritage survey crews) when they are close to or within a exclusion zone associated with a known area cultural heritage value. WMP has committed to the following: "Jointly with the Ngaanyatjarra Council. Geofencing equipment will exclusion zone associated with a known area cultural heritage value. WMP has committed to the foll



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- Direct and unauthorised impacts to cultural heritage sites (e.g. Tjukurrpa sites)
- Constrain or otherwise changes the nature of land access to cultural heritage sites or areas of the landscape used for customary uses by Traditional Owners
- Indirect impacts to cultural heritage sites through:
- o The deposition of unacceptable levels of dust.
- o Reduced amenity associated with noise.

Management Action	Management Target(s)	Monitoring	Reporting	Compliance Status	Evidence
Management Objective: Avoid and minimise direct impacts to	potential cultural heritage sites				
					records any intrusion into a heritage exclusion zonand movement outside of approved areas, providin automated notifications to WMP Environment and Secondary Approvals Team regarding the location and severity of the breach. Non-compliance investigation conducted by the WMP Environment and Secondar Approvals Team in response to the notification will be conducted based on the nature and severity of the breach. Breach details provided to WMP by the RightStep system includes the date, time, location severity of breach, and unique reference number of the device that recorded the breach. All recorded breaches will be automatically sent to a central emainbox where the WMP Environment and Secondar Approvals Team will be notified, and appropriate investigation and notification actions initiated in accordance with WM-0000-WHS-PRO-0006 - Even Reporting and Investigation, WM-0000-CRL-PLN-000 - Cultural Heritage Management Plan and the Minin Agreement held with NgC. The use of the RightStep system is a critical control to the effective management of the cultural heritage risk on-site to prevent unauthorised impacts to heritage values particularly in regional areas situated outside of the Central Mine Area (CMA) where hard controls are present to prevent impacts. The use of high accurace GPS systems, in Heavy Equipment and Machiner (HME) is superior to the RightStep tablet, when appropriate and up to date spatial data is used. • Cultural Heritage Monitoring Procedure has been developed and is currently under revision. Heritage
					monitors are invited to attend first groun disturbance works and informed prior to propose works via three week monitoring lookahead, thre month and five-week LADP and upcoming/ongoin works lookahead.
					 BHP developed a dedicated NgC webmap for viewing of the WMP spatial data, including environmental and cultural heritage values.
					 No removal or destruction of archaeological and/o other cultural heritage sites occurred during th reporting period. Isolated artefacts were salvage February 2023 that were situated in immediate wor areas.
					 WMP contract document contains provision specifically requiring contractors work to comply wit environmental and cultural specifications, plans, an approvals. Tender evaluation includes assessment of Ngaanyatjarra opportunities.



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Management Action	Management Target(s)	Monitoring	Reporting	Compliance Status	Evidence
Management Objective: Avoid and minimise direct impac	cts to potential cultural heritage sites				
					 Approved LADPs are accepted by the Contracting partner or entity executing the works, including the conditions and limitations associated with the approved permit. Engagement with NgC including invitations for participation in monitoring and management activities are maintained in Stakeholder Engagement Register. Records of invitations are stored in the BHF
					 document management system. Notice of upcoming works is provided to NgC via the weekly three-week monitoring lookahead and monthly three month and five-week LADP upcoming and ongoing lookahead documentation with accompanying maps.
					 Events entered into the BHP event management system and event outcomes tracked. Events reviewed at Heritage Committee Meeting as an Agenda item and are recorded in the Heritage Event Register and NgC notification.
					 BHP appointed a Cultural Heritage Managemer resource to support the Project up until November 2023 after which a BHP Heritage Specialist for Nicke West commenced supporting heritage work on WMF
					 The BHP appointed Cultural Heritage Managemer resource met with the NgC General Manager of Culture and Heritage at least once per month prior t November 2023, after which the BHP Heritag Specialist for Nickel West commenced supporting heritage work on WMP and attended fortnightly heritage meetings held between BHP and NgC.
					 Regular meetings are held between WMP Asset GI position and NgC CEO. Regular meetings held wit NgC GM Land and Culture.
					 CHMDC committee is now named the Heritage an Liaison Committee. Meeting schedule has bee provided and meetings are held at least quarterly Additional meetings include the Oversight committee and the weekly environment and approvals, an heritage meeting alternated fortnightly.
					Meeting between senior BHP Personnel and the Ngo Board are held annually.
					 Minutes of meetings are maintained in the BH document management system.
					 The first MRF report was submitted to DEMIRS in Jul 2023 This document forms part of the second CAR that i
					due on 20 July 2024.
					 All regulatory reporting documentation is provided to



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- Constrain or otherwise changes the nature of land access to cultural heritage sites or areas of the landscape used for customary uses by Traditional Owners
- Indirect impacts to cultural heritage sites through:
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Management Action	Management Target(s)	Monitoring	Reporting	Compliance Status	Evidence
Management Objective: Avoid and minimise direct impact	s to potential cultural heritage sites	,			
					NgC for information. Key documents such as this CAF and primary approval variations (MS 1188, Part V and Mining Act approvals) are provided to NgC for review and comment prior to submission in accordance with the relevant clauses of the Mining Agreement. NC A breach of the CHMP Golden Rules occurred 27 March 2024 and involved the following:
					An excavator operated under guidance was returning from test pitting at the solar array phase 1. The excavator travelled along a non-nominated road within are exclusion zone and outside of the Mining Agreement to return to the Central Mining Area. The event is considered a non-compliance to the Mining Agreement There was no environmental damage outside of the footprint of the well-formed road. In terms of failed controls that led to the event, the track was signposted with 'no-access' signage at both ends; however, signage was missing from one end (star pickets still standing in place). Signage for these tracks is installed adjacent to the track (rather than hard barricading) to ensure continued community access to utilise the road(s). This event also constitutes a breach from the Golder Rules (#2) in that a designated transport area was left. The event was first reported to the NgC in a telephone
					call by the General Manager, West Musgrave Operation to the CEO Ng Council, in April 2024 when the event wa detected.
					The following immediate actions were taken:
					 All works associated with regional ground disturbance ceased (e.g. borefields, power package, rehabilitation and TSF) whilst the investigation was in progress and so that an audit of no-access signage throughout the development area could be completed.
					 The audit of regional signage identified additional areas, where signage installed as required.
					 Escalation process undertaken and full ICAN investigation initiated.
					As a result of the BHP ICAM investigation detailed corrective actions were identified to prevent recurrence of the event. These actions have been raised in the BHP event management system to ensure tracking and close out and include:
					Ensuring all personnel are aware of the requirement to obtain approval for proposed paths used to access work areas before commencing works under an LADF. The proposed paths used to access to access the proposed paths are as the proposed path
					NgC consultation re possible hard barricadingImprovements to the RightStep geofencing system
					Expediting completion of the East-West access road



Key Environmental Values: Cultural heritage sites, and to the degree possible the broader landscape in which these sites reside. Key Impacts and Risks:

- Direct and unauthorised impacts to cultural heritage sites (e.g. Tjukurrpa sites)
- Constrain or otherwise changes the nature of land access to cultural heritage sites or areas of the landscape used for customary uses by Traditional Owners
- Indirect impacts to cultural heritage sites through:
- o The deposition of unacceptable levels of dust.
- o Reduced amenity associated with noise.

Management Action	Management Target(s)	Monitoring	Reporting	Compliance Status	Evidence
Management Objective: Avoid and minimise direct impacts to pote	ential cultural heritage sites				
					A quality review of implemented actions 30 days after close-out. The full investigation is ongoing, following BHP's findings NgC have been provided with further opportunity to review and provide input to the suitability of the actions and further consultation with the community.
Implement a 'chance find' procedure (will form a condition of LDPs) developed and agreed with the Ngaanyatjarra Council, and managed within the WMP document control system prior to construction commencement and through all project phases thereafter (Aconex or equivalent). The purpose of the chance find procedure is to outline the process that must be followed by OZ Minerals in the event of discovery of cultural heritage material (including skeletal remains) during or immediately prior to land disturbance activities.	Minimise direct impacts on yet to be identified cultural heritage sites (i.e. chance finds)			С	 Chance finds awareness training program PowerPoint presentation forms part of the induction material for every person coming to site. Chance find requirements are communicated via LADPs, as well as chance find posters located throughout West Musgrave officer and work areas. LADP induction and pocketbook communicate chance find requirements to all personnel. Updated Chance Find Procedure is in development. Procedure is being co-developed with NgC.



Management Objective: Maintain access to cultural heritage sites, or areas of the landscape used for customary uses by Traditional Owners								
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence			
 In consultation with Traditional Owners develop and/or maintain access that enable safe and ongoing access to identified cultural heritage sites and areas of the landscape used for customary practices by Traditional Owners In collaboration with Traditional Owners and the Ngaanyatjarra Council enable safe, timely and ongoing access through OZ Minerals tenements for Ngaanyatjarra People. This will include the establishment of new access tracks, facilitating access for Ngaanyatjarra People through the Development Envelope and ensuring that Ngaanyatjarra People can expeditiously (within 60 minutes) open (or have opened for them) locked gates and areas that require access passes, if safe to do so. Ngaanyatjarra Access Plan will be jointly drafted and implemented with the Traditional Owners and Ngaanyatjarra Council OZ Minerals will, on request from the Ngaanyatjarra Council, facilitate access to the Development Envelope and project area for Ngaanyatjarra Council staff and Ngaanyatjarra People subject to reasonable health and safety requirements. During closure planning, access considerations will be undertaken jointly with Traditional Owners, through the Ngaanyatjarra Council. Alternate tracks will be developed jointly with Traditional Owners and the Ngaanyatjarra Council to ensure that access to sites, and movement through the landscape remains as uninhibited as possible, noting that some Traditional Owners have nominated specific locations for alternative access tracks. 	Agreed access plan with the Ngaanyatjarra People, through the Ngaanyatjarra Council, and compliance with that Plan. Ngaanyatjarra Access Plan to be agreed prior to the commencement of construction activities.	As-built track observation. The CHMDC will monitor the implementation of the Ngaanyatjarra Access Plan as a standing agenda item.	WMP Compliance Assessment Report Where breaches of management actions relating to access are identified, an incident report will be developed and communicated with the CHMDC and Ngaanyatjarra Council with agreed remedial actions (Section 3.2.7). All incidents, issues and noncompliances relating to access will be maintained in a register that will be reviewed by the CHMDC as per the CHMDC standing agenda in Section 3.3.3.	C	 Mining Agreement includes provision that the Company must not restrict access by Ngaanyatjarra Council to the Agreement Area except where reasonably required to ensure safety. As the Project is currently and active construction site, access restrictions do apply to protect people and property. Roads and access tracks within the Development Envelope are maintained in the BHP spatial database, including areas deemed to be no-go for BHP employees and WMP personnel. A Shared Access and Road Safety Management Plan was developed and agreed between OZ and NgC in November 2022, the share access plan is currently under review to address progression of the Project and additional infrastructure that has been commissioned, such as the on-site aerodrome. In areas where previous community access tracks are not safe for use during the construction phase, alternative access routes have been agreed and graded, and commitment to restore access during the Operations phase has been made. Access to cultural sites outside of the active works area have been maintained, wherever practicable, during the reporting period. Access arrangements, roads works, road upgrades and road safety initiatives are discussed during quarterly Heritage Committee meeting. As Project is in the construction phase, closure planning is not yet relevant. Noting NgC has reviewed the proposed Mine Closure Plan submitted to DEMIRS. This document forms part of the second CAR that is due on 20 July 2024. 			
Management Objective: Avoid and minimise indirect impacts to potential cultural heritage sites								
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence			
Implement the mitigation measures for indirect impacts to cultural heritage sites detailed in Table 5	Implementation of the indirect impact mitigation and management measures described in Table 5.	Review and document the status of implementation of the indirect impact mitigation measures until such time as all the committed mitigation measures have been implemented or are otherwise considered no longer relevant by the Ngaanyatjarra Council.	A summary of the outcomes of the review is to be provided in the WMP Compliance Assessment Report	С	Please see the evidence presented in reference to CHMP section 1.7.1.4 and indirect impacts above regarding mitigation measures. These include measures relating to indirect impacts such as dust, fire, road alignments and so forth.			



Management Objective: Increase project team cultural awareness	and of the requirements for cultural	heritage protection at the West Musgrave Project			
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
 Develop a site induction package to all persons working on or visiting the WMP, that addresses key requirements of this CHMP, that has been developed with and agreed by the Ngaanyatjarra Council and has been recorded within the WMP document control system (Aconex or equivalent). Implement a site induction package that addresses key requirements of this CHMP. Develop a cultural awareness package that addresses key requirements of this CHMP, and other elements that contribute to cultural competency of WMP workforce that has been developed with and agreed by the Ngaanyatjarra Council and has been recorded within the WMP document control system (Aconex or equivalent). Implement a cultural awareness training program for all permanent workforce and regular visitors to the WMP ((Note: permanent is defined for the purpose of this management plan as a person (employee or contractor) that attends site more than three times or plans to reside onsite for a period of greater than three months). OZ Minerals will invite Ngaanyatjarra People, through the Ngaanyatjarra Council, to deliver the cultural awareness package, and the cultural heritage aspects of the site induction package. When that invitation is accepted, OZ Minerals will pay reasonable costs for Ngaanyatjarra People or Ngaanyatjarra Council representatives to deliver these packages. OZ Minerals, with the Ngaanyatjarra Council, will jointly develop and implement a cultural heritage communication and information plan (unless otherwise agreed). This plan will (but not be limited to) establish points of contact and communication in the Ngaanyatjarra Council and OZ Minerals, what sort of information will be communicated and shared between OZ Minerals, the Ngaanyatjarra Council and Ngaanyatjarra People, methods and styles of communication, roles and responsibilities. 	All project personnel remain within designated cleared areas as defined in Ngaanyatjarra Council issued cultural heritage survey reports Ngaanyatjarra People to be invited to participate in the delivery of the heritage management aspects of site inductions, cultural awareness training and deliver those aspects of the induction and the cultural awareness training (subject to fair and reasonable commercial terms). Cultural awareness training and cultural induction program to commence prior to the commencement of operations All permanent workforce and regular visitors to the WMP receive cultural awareness training and cultural induction Build cultural awareness within project personnel	Induction records confirm that all personnel are inducted prior to the commencement of site-based work, for all persons attending the WMP. Training records confirm that all permanent workforce, which includes employees, contractors, and subcontractors associated with the WMP have undertaken the cultural awareness training program within six (6) months of commencement of employment at WMP. Note: permanent is defined for the purpose of this management plan as a person that attends site more than three times or plans to reside onsite for a period of greater than three months.	A summary of the number of people who have undertaken site inductions, and the cultural awareness training will be provided in the WMP Compliance Assessment Report A summary of the number of people who are eligible to undertake site inductions and the cultural awareness training, relative to the number of people who have undertaken the inductions and training will be provided to Ngaanyatjarra Council on a quarterly basis or as reasonably requested.	C One NC	 A cultural Induction Program has been developed and implemented by BHP pending a completed induction program developed by NgC. All employees, contractors and visitors are required to complete the induction prior to accessing the WMP site. This includes training in Land Access and Disturbance permitting requirements. Records of induction program attendance are maintained with the personnel records of all staff and contractors working on site. A practical cultural awareness training program was developed by NgC. Its implementation involves conduct of one-day Bush Trips guided by Ng community members for senior members of the BHP workforce. Participants spend one day on country with the community members for cultural familiarisation and awareness. During the reporting period four bush trips were attended by 48 West Musgrave personnel and 158 (non-unique) Traditional Owners. The total since project commencement now stands at six bush trips attended by 72 West Musgrave personnel and 205 Traditional Owners. Chance finds and awareness training program is included in the induction material and a LADP booklet that includes chance find information has been produced and distributed to staff and contractors. Mining Agreement provides for compensation of NgC personnel to develop and deliver training materials. NgC is paid as per the Mining Agreement provisions. NC A breach of the CHMP Golden Rules occurred 27 March 2024 and involved the following: An excavator operated under guidance was returning from test pitting at the solar array phase 1. The excavator travelled along a non-nominated road within an exclusion zone and outside of the Mining Agreement to return to the Central Mining Area. The event is considered a non-compliance to the Mining Agreement to return to the Central Mining Area. The event is considered a non-compliance to the Mining Agreement to return to the Central Mining Area. The event is considered a non-compliance to the



Management Action Management Target Monitoring Reporting Compliance Status All works associated with regional ground disturbance ceased (e.g. borefields, power package, rehabilitation and TSF) whilst the investigation was in progress and so that an audit of no-access signage throughout the development area could be completed. The audit of regional signage identified additional areas, where signage installed as required. Escalation packs undertaked to prevent a recurrence of the event management where the actions have been raised in the BHP event management of the event management of the event management to obtain approval for proposed paths used to access work areas before commencing works under an IADP
disturbance ceased (e.g. borefields, power package, rehabilitation was in progress and 5th an audit of no-access signage throughout the development area could be completed. The audit of regional signage identified additional areas, where signage installed as required. Escalation process undertaken and full ICAM investigation process undertaken and full ICAM investigation in the BHP ICAM investigation detailed corrective actions were identified to prevent a recurrence of the event. These actions have been raised in the BHP event management system to ensure tracking and close out and include: Ensuring all personnel are aware of the requirement to obtain approproaces aware of the requirement to obtain approaces work areas before commencing works under an
NgC consultation re possible hard barricading Improvements to the RightStep geofencing system Expediting completion of the East-West access road A quality review of implemented actions 30 days after close-out The full investigation is ongoing, following BHP's findings NgC have been provided with further opportunity to review and provide input to the subtility of the actions and further consultation with the community.

Management Objective: Provide a mechanism to allow for community feedback relating to any issues, complaints and grievances							
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence		
An issues, complaints and grievance system shall be developed to assist with documenting, investigating and responding to complaints made by community groups and stakeholders, and all stakeholder issues and concerns will be proactively addressed	To acknowledge receipt of any feedback within two days of receiving the feedback. To provide a response within two weeks to the community group or stakeholder providing the feedback.	The CHMDC will review the issues, complaints and grievance system as a standing agenda item.	A summary of the outcomes of the review is to be provided in the WMP Compliance Assessment Report.	С	 In accordance with the Mining Agreement, a Stakeholder Engagement Program has been prepared and includes a description of the grievance mechanism in relation to cultural heritage. Since the acquisition by BHP, the Nickel West Grievance Procedure has been adopted for use on the WMP, which complies with the BHP Community Complaints Procedure for Western Australian operations. The grievance handling mechanisms implemented by the WMP complies with Section 3.2.7 of this CHMP and the requirements of the BHP, Western Australia Operations Community Complaints Procedure (WA Communities, Number 0072027, Version 11). As per the applicable BHP grievance classifications, no grievances were recorded during the reporting period. 		





A3. APPENDIX 3 – AUDIT FINDINGS FOR FVMP IMPLEMENTATION

Flora and Vegetation Management Plan Audit Table

FVMP Reference	Element	Requirements	Compliance Status	Evidence
1.4.3	Management Approach Table 7: Minimisation Measures for Direct Impacts to Priority	A considerable effort has been made to reorient and reduce the size of Development Envelope to avoid impacts to environmental values. This has included a reduction of the Development Envelope from 25,200 ha to 21,679 ha (13.3 percent reduction), and of the disturbance footprint from 3,961 ha to 3,830 ha resulting in the exclusion of some significant species (such as the formally proposed Western Access Road and parts of the Southern Monitoring Area where deep sand spinifex occur). Under Attachment 1 to MS1188 (s45 C amendment) the clearing footprint has been increased from 3,830 ha to 4,213.3 ha.	С	 Clearing is less than the approved amount and is all within the approved Development Envelope. Cumulative clearing as of 31 March 2024 is 597.4 ha
	Flora	Project footprint will be designed to avoid priority and significant flora populations where possible	С	 Records of Priority flora locations have been entered into the Project's ArcGIS Online (AGOL) based Land Access and Disturbance Permit (LADP) system. Land disturbance activities are designed, authorised and controlled to avoid priority and significant fauna populations. No priority flora species have been cleared to date.
				 Priority species proximate to work areas and P1 species are demarcated in the field whereby surrounding exclusion areas have been pegged using environmental pegs (blue and white striped caps on fence droppers).
				 Records of all significant and priority flora populations are maintained in the BHP spatial database.
		Clear demarcation would be erected around Priority 1 species where possible, including Aenictophyton anomalum	С	 Priority flora is recorded in GIS system and no Priority flora species have been cleared to date. LADPs issued for works on or near <i>Aenictophyton anomalum</i> populations have clear conditions to avoid, noting these works have been largely non-ground disturbing to date.
				 Aenictophyton anomalum populations are demarcated in the field whereby surrounding exclusion areas have been pegged using environmental pegs (blue and white striped caps on fence droppers) Pegging of environmental values is conducted by survey methods and locations uploaded in the central WMP GIS database for auditing purposes.
				 Verification of demarcation is included as a condition of any LADP that involves ground disturbing works in proximity to Aenictophyton anomalum populations.
		Land clearing would be kept to the minimum necessary for development of the proposed project, and avoid, where possible, Priority 1 species exclusion areas	С	 No clearing has occurred within flora exclusion areas. The extent of clearing is verified monthly by survey methods and records are retained in the WMP GIS database. Pegging of environmental values is conducted by survey methods and locations uploaded in the central WMP GIS database for auditing purposes. Exclusion areas around priority species (50 metres for P1 and 30 metres for P3) are reviewed when reviewing LADP applications and regularly as part of the automated geometry check function using the electronic LADP system. LADP conditions include requirement to avoid priority 1 flora populations.
		Develop and implement a site-specific internal land access and disturbance procedure and associated permit to prevent clearing outside approved boundaries	С	 All clearing is authorized and controlled under Land Access and Disturbance Permits (LADP). The LADP approval/planning process helps to minimise the extent of land clearing and confirms clearing occurs within approved areas are consistent with the Project
				 approvals. Ground disturbance cannot occur until and approved disturbance boundary layer has been issued for the works following the issue of an approved LADP.
				• Monthly assurance is performed for each LADP to ensure compliance, especially with regard to the avoidance of heritage and ecological exclusion areas and remaining within the approved disturbance envelope. Daily automated geometry screening occur against approved LADP work areas, verified cleared areas and environmental and heritage values to ensure work is within approved areas only.
				 The as-constructed clearing extent is confirmed using survey methodology and maintained in the WMP central GIS database.
				 All clearing records are maintained within the ArcGIS Online (AGOL) based LADP system.



FVMP Reference	Element	Requirements	Compliance Status	Evidence
		Known locations of Priority and significant flora species are included in the site's GIS database to ensure locations are avoided where possible during future activities	С	 Known locations of Priority and significant flora species are included as exclusion layers in the ArcGIS based LADP system and is utilised for the avoidance purposes in the LADP approval process. Daily automated geometry screening incorporated into the LADP system screens active LADPs to ensure any updated spatial data is identified that may potentially impact active LADPs. Spatial data associated with Priority and significant flora species is maintained in BHP spatial database. Priority flora species proximate to work areas and P1 species are demarcated in the field whereby surrounding exclusion areas have been pegged using environmental pegs
		Where practicable, land clearing would be undertaken progressively with the amount of active disturbance minimised	С	 (blue and white striped caps on fence droppers) Land clearing is minimised to the areas needed for development, and is postponed to the time of active development, where possible. During the reporting period a total of 259.8 Ha was cleared, bringing the total clearing to 597.4 Ha. The approved clearing footprint is 4,123 ha.
				 Areas not required for construction in the long term have not been cleared during the reporting period. Clearing minimisation is conditioned in the LADPs and land clearing cannot commence until an approved disturbance layer is issued, taking into consideration the design requirements and approved disturbance footprint according to the Mining Proposal and associated mine categories. Records of clearing are maintained in LADP system. The extent of clearing in relation to current development areas indicates that excessive clearing was not conducted in relation to current development areas.
		Existing disturbed areas would be used wherever possible to minimise total ground disturbance	С	 Already disturbed areas are re-used wherever practicable to minimise ground disturbance. Existing roads, tracks and bore pads are being used where practicable. The area disturbed for the exploration camp, which sits in the future waste rock dump (WRD) is now being re-purposed for logistics, lay-downs, waste management and workshops. The landfill, waste transfer station and project washbay facility all occur within the
				 future Nebo Waste Rock Dump footprint. Any construction access tracks are designed to sit within the final road alignment footprint to minimise disturbance. Existing drill pads and access tracks are utilised wherever practicable.
		The site induction program would provide information on priority species, exclusion zones and ground disturbance authorisation procedures	С	Site induction contains relevant information on priority species, procedures for the avoidance of exclusion zones, and the LADP procedures, including the specific LADP competency-based module. Induction material is reinforced via the LADP pocketbook provided to on-site employees.
		Progressive rehabilitation would be undertaken on disturbed areas as they become available	NR	Due to the project being in construction, rehabilitation is not yet relevant. Where possible, bore pads and geotechnical testing disturbance areas are rehabilitated upon confirmation that they will not be used in future.
		Topsoil and vegetation (including woody debris) would be re-spread over rehabilitated areas to act as a seed source and to protect the soil from erosion	NA	Due to the project being in construction, rehabilitation is not yet relevant. Where bore pad and geotechnical investigation rehabilitation is undertaken, vegetation is spread over the rehabilitated area post infill and scarification.
		Local provenance seed and propagated material would be used, if required, to rehabilitate disturbed areas	NR	Due to the project being in construction, rehabilitation is not yet relevant. Scoping of a potential seed collection program is currently being initiated between BHP, NgC and botanists.



FVMP Reference	Element	Requirements	Compliance Status	Evidence
1.4.3	Management Approach	Firefighting equipment would be located on site and emergency personnel would be trained in fire response	С	 Daily vehicle and mobile plant pre-start inspection checks include checks of in-vehicle fire extinguishers. All fire-fighting equipment is audited quarterly by the relevant contracting partner
	Table 8: Minimisation Measures for Indirect			and by Mercury Fire for BHP-owned firefighting equipment.
	Impacts to Priority Flora			 ERT training schedule includes fire and rescue and is undertaken on a weekly basis. The Bushfire Management Plan was issued for use in August 2022 and contains information in firefighting equipment and firefighting training. Plan is currently under revision to capture current site requirements as construction progresses
		Vehicles to keep to access tracks or cleared areas wherever practicable	С	Conditions of LADPs reflect this requirement, with compliance self-reported monthly. This requirement also forms part of all site inductions and the mandatory code of conduct for all drivers attending the site.
		A Hot Work Permit system would be developed and implemented	С	 All hot works outside designated workshop areas are subject to first obtaining a hot works permit. Records of hot work permits are maintained by the various contracting partners and BHP Site Services. Compliance to the hot work permit system is subject to regular WHS audits.
				 During total fire ban periods, DFES is notified by Site ERT prior to the commencement of hot works, where applicable
		All machinery and vehicles undertaking clearing activities would be fitted with firefighting equipment	С	 Daily vehicle and mobile plant pre-start inspection checks include checks of in-vehicle fire extinguishers.
				 All fire-fighting equipment is audited quarterly by the relevant contracting partner and by Mercury Fire for BHP-owned firefighting equipment.
		Fire management practices would be made in consultation with the Department of Fire and Emergency Services (DFES) and the Ngaanyatjarra Council (NGC) including installation and maintaining firebreaks if required, so that potential environmental damage from extreme and out of control wildfires is minimised,	С	 Arrangements to minimise the potential environmental harm from bushfires are contained in the Bushfire Management Plan (WM-0000-WHS-PLN-0009), that aligns with relevant DFES standard operating procedures.
		and infrastructure and the community are protected throughout the life of the project		 Records of correspondence with DFES and the NgC are maintained in the BHP SharePoint system and informed the development of fire response planning.
				 Specifications for the establishment and maintenance of firebreaks are contained in the Bushfire Management Plan
				 A memorandum of understanding for Mutual Support in Planning and Responding to Emergency Incidents was concluded between DFES and OZ Minerals Musgrave Operations Pty Ltd on 22 August 2022.
		The project site induction would include information on prevention and management of fires	С	Information on prevention and response to fires is contained in the site induction material, which is required to be completed by all personnel prior to arriving at site.
		A vehicle hygiene procedure would be implemented for vehicles and equipment coming on to, or returning to, the site for earthmoving	С	• In accordance with the WMP Weed Management Procedure, a weed hygiene procedure has been implemented that requires cleaning of all vehicles and mobile plant before coming to site, details of which are recorded in the Weed Hygiene form. When arriving on site, all vehicles and mobile plant are inspected again to confirm adequate weed hygiene. If suspected weed or seed material is detected, the material must be manually removed and presented for reinspection before being permitted to move around the WMP site.
				 For vehicles bought in from other states, appropriate DPIRD biosecurity clearance information is required before the vehicle/mobile plant is used on site. Weed hygiene inspection records are maintained in the BHP document management system and an inspection sticker is affixed to each vehicle for auditing purposes.



FVMP Reference	Element	Requirements	Compliance Status	Evidence
		Weed control would be implemented on areas to be disturbed for infrastructure	C	 A baseline weed survey was conducted prior to construction commencement (October 2022), which found that weeds were largely located on pre-disturbed areas (roads, access tracks, accommodation village) Two weed species were encountered during the field assessment. These included 266 locations with an estimated 4,661 records of <i>Cenchrus ciliaris</i> (Buffel Grass), and one location represented by 1 plant of <i>Tribulus terrestris</i> (Caltrop). Eradication of buffelgrass was not considered feasible due to its widespread occurrence in the wider region. Given the absence of weeds detected in previously undisturbed areas, no weed control measures were undertaken within undisturbed areas to date prior to site development works in these locations. Weed control of any areas subject to weed infestations, either pre or post disturbance is conducted. Western Botanical completed an additional baseline weed survey in accordance with the FVMP in May 2023. In addition to Buffel grass and Caltrop, the following weed species are present on site: Citrullus colocynthis – Paddymelon Rumex vesicarius – Ruby Dock Hypochaeris radicata – Flat Weed / Hairy Cats Ear Malvastrum Americanum – Spiked Mallow Erodium aureum – Golden Herons-bill / Stroks Bill / Pinweed / Redstem Chloris virgata – Feathertop Rhodes Grass Brassica tournefortii – Mediterranean Wild Turnip Western Botanical, is scheduled to undertake the first annual weed survey, following the baseline survey in 2023, during May 2024 A weed control program was rolled out in Q1 2024 to align with the flowering period and optimal chemical treatment window. Weed control interventions during the reporting period consisted of the chemical treatment and physical removal of Paddy melon (Citrullus colocynthis), treatment of internal roads and drains and fr
		A weed control management plan would be developed to manage known weed infestations and prevent their spread	C	 and the effectiveness of control programs on an ongoing basis. On the basis of the October 2022 and May 2023 baseline weed surveys, Western Botanical has developed a draft weed management plan. A weed control program was rolled out in Q1 2024 to align with the flowering period and optimal chemical treatment window. Weed control interventions during the reporting period consisted of the chemical treatment and physical removal of Paddy melon (<i>Citrullus colocynthis</i>), chemical treatment of internal roads and drains and freshly disturbed areas to minimise colonisation by existing weeds in March 2024. The BHP Environmental Department maintains a map of weed locations and treatment areas to facilitate ongoing monitoring. Whilst undertaking the baseline weed survey in May 2023, two individuals of <i>Aerva Javanica</i> (Kapok Bush) were discovered in the exploration camp. This species has not previously been detected within the Project footprint. The individuals were subsequently removed manually, placed in black bags and disposed of appropriately off site. As the species is a priority species listed under the 'Goldfields Impact and Invasiveness Ratings List', DCBA and NgC were appropriately notified. At the time of compiling this CAR the Weed Management Plan was with NgC for review. It will be implemented during the 2024/5 reporting period.



FVMP Reference	Element	Requirements	Compliance Status	Evidence
2.3.1	Reporting Ngaanyatjarra Council and Ngaanyatjarra People	All reporting discussed in section 2.3 of the FVMP will be made specifically available to the Ngaanyatjarra People through the Ngaanyatjarra Council, including where necessary periodic face-to-face meetings to discuss the results and outcomes of monitoring.		 Statutory annual reports and new flora and vegetation study reports are made available to the NgC, and the contents of reports are discussed during regular heritage and environment and approvals meetings. Records of the provision of reports and the discussion of results are captured in the minutes of meetings that are maintained in the BHP document management system. Topics relevant to the FVMP, including weed management are raised during the NgC Heritage and Liaison Committee meetings.
2.3.2	Compliance Reporting	OZ Minerals will prepare Annual Environmental Reports (AERs) to be submitted to regulatory authorities.	С	The first report was submitted to the DEMIRS in August 2023.
		A Compliance Assessment Report (CAR) will be submitted to the Compliance Branch at Government of Western Australia's Department of Water and Environmental Regulation (DWER) at an agreed date.	С	This document forms part of the second CAR that is due on 20 July 2024.
3.1	Management Review	The FVMP will nominally be reviewed at least every three years from the date of endorsement to ensure that it reflects the current situation with regards to WMP flora management and monitoring.	С	Review of the FVMP is currently in progress to incorporate new knowledge from additional targeted flora surveys undertaken in 2023 and 2024 by Western Botanical and will be submitted to align with the revised MS1188.
		 The FVMP may also be reviewed should any of the following occur: A change in conservation rating of any flora species known to occur in the project area (e.g. the addition of new species and/or an increase or decrease in the conservation rating of any species) The addition or change of infrastructure within WMP that has the potential to significantly change the predicted direct or indirect impacts on Priority flora species, and that was not approved within the scope of the project Any change in operational practices on site that has the potential to significantly change the predicted direct or indirect impacts on Priority flora species, and that was not approved within the scope of the project. 	С	 Review of the FVMP is currently in progress to incorporate new knowledge from additional targeted flora surveys undertaken in 2023 and 2024 by Western Botanical. The current review of the FVMP captures additional surveys along the proposed new Northern Access Road. No significant changes to the Project. Revised plan to be submitted to DWER Q4 2024



FVMP Objective Based EMP Audit Table

Management Objective: Minimise requirements for land clearing and associated loss of priority flora species

Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
Land disturbance kept to the minimum necessary for development of the project Develop and implement a site-specific internal clearing/disturbance procedure and associated land access and disturbance permit (LADP) Where practicable, land clearing undertaken progressively with the amount of active disturbance minimised Existing disturbed areas used wherever possible to minimise total land disturbance	 Total project-related land disturbance is to be within the approved Development Envelope and not to exceed the approved area Disturbance of Priority flora species populations avoided wherever practicable, and otherwise minimised 	 Annual review of land disturbance- related survey data, and comparison with project-related land disturbance on the respective year's aerial imagery, relative to the approved area of project- related land disturbance Annual review of internal project- related land access and disturbance register relative to actual project- related land disturbance and LADPs 	 Internal project-related Land Access and Disturbance Register and LADPs Mining Rehabilitation Fund (MRF) annual reporting Annual WMP Compliance Assessment Report Details (locations and species) of additional priority flora species populations to be forwarded to the DBCA within 6 months of discovery 	C	 Land clearing is minimised to the areas needed for development, and is postponed to the time of active development, where possible. During the reporting period a total of 336.4 Ha was cleared, bringing the total clearing to 597.4 Ha. The approved clearing footprint as per the Section 45C amendment decision issued 02 February 2024 is 4,213.3ha. The current approved clearing footprint under the FVMP is 3,830 ha, which will be amended to 4,213.3 ha in accordance with the amended MS 1188 when the revised FVMP is submitted and approved. All clearing is authorised and controlled under Land Access and Disturbance Permits (LADP). The LADP approval/planning process helps to monitor minimise the extent of land clearing. Monthly assurance is performed for each LADP to ensure compliance, particularly with regard to the avoidance of heritage and ecological exclusion areas and remaining within the approved disturbance envelope. Automated geometry screening is conducted daily to ensure approved LADP work areas remain within approved areas and out of environmental or heritage exclusion areas. A comprehensive, ongoing contractor audit program was implemented in the reporting period and is in progress at the time of reporting. To date the main contractors who are responsible for all infrastructure clearing activities have been audited and were found to be compliant with the LADPs relevant to their work activities. Audit records are maintained in Aconex and the MyOSH system. Through ongoing implementation of the audit program 100% of LADP's will be audited in each reporting period. The WMP LADP cascades relevant conditions of the NgC PtW down to the contractor level to ensure compliance with the conditions relevant to ground disturbing activities. A summary of audit numbers and actions raised following audits is maintained in the BHP event management system and can be made available upon request. Actions raised during audits are allocated a



Management Objective: Minimise project Key Impacts and Risks: Loss of, or degrada		·	altered fire regimes		 demarcated in the field whereby surrounding exclusion areas have been pegged using environmental pegs (blue and white striped caps on fence droppers) One additional priority flora species and one species of interest (SOI) (ID to be confirmed) have been identified within the Development Envelope. The locations of these species have been reported to the relevant government agencies via IBSA. The submission numbers are: IBSASUB-20231211-D966382C: IBSA number: IBSA-IBSA-2023-0552 has been allocated to this submission. IBSASUB-20240625-113375A6. IBSA number: IBSA-2024-0270 has been allocated to this submission. The first MRF report was submitted to DEMIRS in July 2023 This document forms part of the second CAR that is due on 20 July 2024.
Management Action	Management Target	Monitoring	Reporting	Compliance	Evidence
 Develop and maintain a Fire Mitigation Plan and incorporate into the Asset Emergency Management Plan Install and maintain fire extinguishers and firefighting equipment in the project area and on site to relevant Australian Standards Install and maintain firefighting equipment in machinery and vehicles undertaking land disturbance activities Project emergency response personnel trained in fire and bushfire response Vehicles kept to access tracks or cleared areas Develop and implement a Hot Work Permit system Fire management practices developed in consultation with WA Department of Fire and Emergency Services (DFES) and the Ngaanyatjarra Council, including installation and maintenance of firebreaks if required Site induction to include information on prevention, management and response to fires 	 No unplanned fires attributable to project-related activities To minimise the potential environmental damage from project-related extreme or out-of- control wildfires 	Quarterly emergency response equipment inspections relative to relevant Australian Standards Annual fire response training exercise including wildlife response Annual review of fire break development for evidence of adequate installation and maintenance	 Internal incident reports Internal project-related Land Access and Disturbance Register and LADPs Hot Work Permit register Induction and training records Annual WMP Compliance Assessment Report 	Status	 The Bushfire Management Plan (WM-0000-WHS-PLN-0009) was issued for use on 29/08/2022 and is currently under revision. The WMP Fire Mitigation Plan (WM-0000-WHS-PLN-0026) was issued for use on 14 September 2022. Quarterly fire appliance audits are conducted to ensure compliance with the commitments in this plan. Findings of the audits are maintained in the BHP document management system and actions raised in the event management system (MyOSH) as required. All fire-fighting equipment is audited quarterly by the relevant contracting partner and by Mercury Fire for BHP-owned firefighting equipment. All vehicles and mobile plant are equipped with firefighting equipment that is checked daily as part of the pre-start inspection. All emergency response personnel are trained in fire and bushfire response. Training is conducted weekly. Site rules prohibit departure from defined access tracks during operations. Departure during Project development is conducted only as required and is monitored by inspections and LADP system reporting. A hot works permit system has been established and all hot works outside established workshop areas are recorded in the Hot Works Registers maintained by the various contracting partners and BHP Site Services. DFES are notified of any hot works intended to occur during a total fire ban as required, prior to the works commencing. Information on prevention and response to fires is contained in the site induction material. No fires with the potential to cause environmental harm were recorded within the reporting period. An ozone reacting with a carbon filter fire occurred at the WWTP that caused no environmental harm and was contained. Arrangements to minimise the potential environmental harm from bushfires are contained in the Bushfire Management Plan (WM-0000-WHS-PLN-0009), that aligns with relevant DFES standard operating procedures and includes maintenance of fire breaks.



APPENDIX 3 - AUDIT FINDINGS FOR EVMP IMPLEMENTATION

			Appendix 3 - Audit Findings for FVMP Implementation
		F	A memorandum of understanding for Mutual Support in Planning and Responding to Emergency Incidents was concluded between DFES and OZ Minerals Musgrave Operations Pty Ltd on 22 August 2022.
			Firebreak has been established around the perimeter of the accommodation camp, fixed plant and work areas.
			All clearing is authorised and controlled under Land Access and Disturbance Permits (LADP).
			The LADP approval/planning process helps to minimize the extent of and clearing.
		a	Monthly assurance is performed for each LADP by the permit holder to ensure compliance, especially with regard to the avoidance of heritage and ecological exclusion areas and remaining within the approved disturbance envelope. Disturbance is reported monthly using survey data.
			All clearing records are maintained within the ArcGIS Online (AGOL) based LADP system.
			This document forms part of the second CAR that is due on 20 July 2024.



Management Objective: Minimise project-related indirect impacts to priority flora species

Key Impacts and Risks: Loss of, or degradation of, vegetation condition due to project-related indirect impacts from increased abundance and or diversity of weeds

Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
vehicle hygiene procedure implemented for vehicles and equipment coming on to, or returning to, the site for earthmoving Weed control implemented on all project-related areas of disturbance Develop and implement a Weed Control Management Plan to manage known weed infestations and control spread	 No vehicles or equipment brought to site without being cleaned of soil and vegetative matter No new Declared pest species listed under Section 22 of the <i>Biosecurity and Agriculture Management Act, 2007</i> (WA), Weeds of National Significance (see https://weeds.org.au/) and weeds listed on DBCA's 'Goldfields Impact and Invasiveness Ratings List', become established within project-related disturbed areas No increases to weed species' diversity or abundance due to project-related activities 	 Quarterly review of vehicle and equipment hygiene inspection records Annual review of site-wide weed inspection records in disturbance areas 	 Incident reports Weed register Workplace inspection reports Annual WMP Compliance Assessment Report which will include: Details of any new weeds identified Details on the success of control actions 	C	 In accordance with the Weed Management Procedure, weed hygiene practices have been implemented that requires cleaning of all vehicles and mobile plant before coming to site, details of which are recorded in the Weed Hygiene form. When arriving on site, all vehicles and mobile plant are inspected again to confirm adequate weed hygiene If suspected weed or seed material is detected, the material must be manually removed and presented for reinspection before being permitted to move around the WMP site. For equipment and mobile plant bought in from other states, appropriate DPIRD biosecurity clearance information is required before the vehicle/mobile plant is permitted on site. Weed hygiene inspection records are maintained in the BHP document management system and an inspection sticker is affixed to each vehicle for monitoring and auditing purposes. A weed control program was rolled out commencing in Q1 2024 to align with the flowering period and optimal chemical treatment window. Weed control interventions, conducted in March 2024, during the reporting period consisted of the chemical treatment and physical removal of Paddy melon (Citrullus colocynthis), as well as treatment of internal roads and drains and freshly disturbed areas to mitigate and minimise colonisation by existing weeds. The weed treatment program was successful in removing weeds form the former exploration camp and application areas throughout site. These areas will be monitored informally and via the annual weed survey to confirm the effectiveness of the weed treatment activity. Further weed treatment activities will be conducted during optimal periods, depending on the target species, in 2025. One new Weed species, Aerva Javanica (Kapok Bush), listed on DBCA's 'Goldfields Impact and Invasiveness Ratings List', was identified during the reporting period and subsequently removed. One new Weed species forms period and subsequently removed. A quarterly review of vehicle and equipment



Weed Monitoring Audit Table

Phase	Location	Frequency	Survey Method	Compliance Status	Evidence
Prior to Construction	Main Development Area and along infrastructure corridors (Northern Access Road and Northern Borefield). Main focus of baseline will include drainage lines, areas where water accumulates, roadsides	One-off (March to June)	 Targeted Weed Survey Monitoring will include: Date and time of monitoring Weed species observed at specific locations within the Development Envelope (a visual guide will be available for identification of previously recorded Declared and introduced species). GPS location of any species not previously identified and not present within the visual guide Estimate number of plants at each location Reproductive status of weed if possible (e.g. flowering, nonflowering, seed set, seeding, condition) Results of baseline targeted weed survey will be used to determine appropriate quadrats for ongoing monitoring activities 	C	 A baseline weed survey was conducted prior to construction commencement (October 2022), which found that weeds were largely located on pre-disturbed areas (roads, access tracks, accommodation village) Two weed species were encountered during the field assessment. These included 266 locations with an estimated 4,661 records of <i>Cenchrus ciliaris</i> (Buffel Grass), and one location represented by 1 plant of <i>Tribulus terrestris</i> (Caltrop). Eradication of buffelgrass is considered not feasible due to its widespread occurrence in the wider region. Given the absence of weeds detected in previously undisturbed areas, no weed control measures were undertaken within undisturbed areas prior to the commencement of site development works. Western Botanical completed a further baseline weed surveys in May 2023, in accordance with the commitments of the FVMP. In addition to Buffel grass and Caltrop, the following weed species are present on site: Citrullus colocynthis – Paddymelon Rumer vesicarius – Ruby Dock Hypochaeris radicata – Flat Weed / Hairy Cats Ear Malvastrum Americanum – Spiked Mallow Erodium aureum – Golden Herons-bill / Stroks Bill / Pinweed / Redstem Chloris virgata – Feathertop Rhodes Grass Brassica tournefortii – Mediterranean Wild Turnip The annual weed survey is scheduled for May 2024, the findings of which will be presented in the next CAR. A weed control program was rolled out commencing in Q1 2024 into 2024 to align with the flowering period and optimal chemical treatment window of weed of concern with the Development Envelope, including <i>Citrullus colocynthis</i> (Paddymelon) within the old exploration camp footprint. Weed control interventions during the reporting period, conducted in March 2024, consisted of the chemical treatment and physical removal o



Construction and Operation	Sites to be selected as an output of No.1, nominally, these locations may include: Reference site between Mantamaru and Papulankutja communities Along Northern Access Road WMP camp and spray field area Adjacent WMP processing plant WMP WRDs Northern Borefield alignment	Annually (March to June, preferably within 6 to 8 weeks of rainfall)	Targeted annual surveys of high-risk areas as identified as an output of No.1. The survey will include assessment of at least six permanent 50 m x 50 m quadrats (marked with metal stakes and flagging tape) which will be established at each of the locations as identified in the Targeted Weed Survey detailed above (No. 1). The following details will be collected at each location: • Date and time of monitoring • Weed species observed at specific locations within the Development Envelope (a visual guide will be available for identification of previously recorded Declared and introduced species). GPS location of any species not previously identified and not present within the visual guide • Estimate number of plants at each location • Reproductive status of weed if possible (e.g. flowering, nonflowering, seed set, seeding, condition) • Observations relevant to the presence of the new species (i.e. proximity to roads, water sources) • Any control actions taken (i.e. manual removal, spraying etc.)	C	 Western Botanical has been engaged to conduct annual weed surveys in compliance with the survey requirements. Reports for surveys conducted in October 2022 and May 2023 are maintained in the BHP document management systems. The inaugural annual weed survey is scheduled to occur May 2024 and the findings will be presented in the next CAR. The draft Weed Management Plan identified that the ongoing weed monitoring program will focus on the six weed species highlighted for management and listed below: Aerva javanica (perennial) Cenchrus ciliaris (perennial) Citrullus colocynthis (annual) Hypochaeris radicata (annual) Rumex vesicarius (annual), and Tribulus terrestris (annual) The draft Weed Management Plan describes the proposed monitoring of thirteen permanent 50m x 50m quadrats, which have been established across a number of Cenchrus ciliaris (Buffel Grass) populations of varying density, to measure percentage foliar cover of weeds. These quadrats are spatially distributed across the site to provide sample sites that can be used to provide ground calibration for the weed density imagery. At each quadrat the following parameters will be recorded:
Construction and Operation	Main Development Area and along infrastructure corridors (Northern Access Road and Northern Borefield). Main focus of baseline will include drainage lines, areas where water accumulates, roadsides	Every five years (March to June, preferably within 6 to 8 weeks of rainfall)	Targeted Weed Surveys as detailed in No 1.	С	Not yet applicable





A4. APPENDIX 4 – AUDIT FINDINGS FOR GMMP IMPLEMENTATION

GMMP Reference	Element	Requirements	Compliance Status	Evidence
2.6.1	Reporting to Ngaanyatjarra Council and Ngaanyatjarra People	All reporting discussed in this section will be made specifically available to the Ngaanyaljarra People through the Ngaanyaljarra Council, including where necessary periodic face-to-face meetings to discuss the results and outcomes of monitoring. The Ngaanyaljarra Council will be made aware of any trigger or threshold exceedances within 48 hours of OZ Minerals becoming aware of them.	NC	 Under the requirements of Groundwater Licence GWL207745, EMM Consulting prepared the annual Groundwater Monitoring Summary Report, for the period 1 January 2023 to 31 December 2023. The report was submitted to DWER prior to 31 March 2024, as per the requirements of the Licence. The NgC was notified of the submission of the report in the regular Approvals and Environment Meeting held between NgC and BHP 3/4/2024. Discussion of the preparation of the report was recorded in the meeting minutes of 20/3/2024. The total volume of water abstracted for the reporting period is 599,825 kL (7.99% of the annual 7.5GL/year groundwater allocation. No material exceedances of trigger or threshold values occurred during the reporting period. No significant trends in water level or pH were observed for any HSU or the mining area during the reporting period. However, at BMB10-D, the measured EC is consistently (i.e. stable) above the defined trigger, indicating there is statistical limitations in the baseline range, given no causal effect near this bore is noted (due to limited site activities). Sulphate exceedances were recorded in four (4) locations across the mining area (MMB-01 and MMB-02) and Northern Borefield (BMB-05s and BMB10-S) although these exceedances are not inferred to be attributable to the Project, given the limited site activities and are likely a reflection of statistical limitations in the baseline range. No Copper or Nickel trigger levels were exceeded during the reporting period, with measured concentrations well below defined triggers. NCs - Ngaanyatjarra Council was not made aware of the trigger or threshold exceedances associated with electrical conductivity (EC) and sulphate within 48 hours of OZ Minerals (BHP) becoming aware of them. This arose due to the exceedances being regarded as natural and temporal fluctuations in baseline data, whilst also in consideration of the early stages of the
				Project development and lack of appropriate causal factors for the values
2.6.3	Annual and Triannual Aquifer Review	OZ Minerals will prepare annual and triennial (every three years) groundwater monitoring and management reports for submission to DWER (Swan-Avon Region). The annual and triennial groundwater monitoring and management reports will comply with Operational Policy No. 5.12 – <i>Hydrogeological reporting associated with a groundwater well licence</i> (DoW, 2009). The reports will include an assessment of compliance with the GMMP and may include recommendations for changes to the water management system to maintain compliance with the GMMP.	С	 EMM Consulting prepared the annual Groundwater Monitoring Summary Report, for the period 1 January 2023 to 31 December 2023. The report was submitted to DWER in March 2024, as per the requirements of GWL207745. The triennial review will be due March 2025 and will be provided with the next CAR.



GMMP Reference	Element	Requirements	Compliance Status	Evidence
2.6.4	Reporting of Potential Non-Compliance	In the event that monitoring, tests, surveys or investigations indicate an exceedance of a threshold criteria, OZ Minerals will report in accordance with the requirements of the relevant Ministerial Statement Condition(s).	NC	 No material exceedance of threshold criteria occurred during the reporting period. No significant trends in water level or pH were observed for any HSU or the mining area during the reporting period. However, at BMB10-D, the measured EC is consistently (i.e. stable) above the defined trigger, indicating there is statistical limitations in the baseline range, given no causal effect near this bore is noted (due to limited site activities). Sulphate exceedances were recorded in four (4) locations across the mining area (MMB-01 and MMB-02) and Northern Borefield (BMB-05S and BMB10-S) although these exceedances are not inferred to be attributable to the Project, given the limited site activities and are likely a reflection of statistical limitations in the baseline range. No Copper or Nickel trigger levels were exceeded during the reporting period, with measured concentrations well below defined triggers. Exceedances of the trigger values for sulphate and threshold values for electrical conductivity (EC) were not reported at the time of detection, which arose due to the exceedances being regarded as natural and temporal fluctuations in baseline data, whilst also in consideration of the early stages of the Project development and lack of appropriate causal factors for the values
3.1	Management Plan Review	 This GMMP will nominally be reviewed at least every three years from the date of endorsement to ensure that it reflects the thencurrent situation with regards to groundwater monitoring and management. This GMMP may also be reviewed should any of the following occur: As and when directed by the CEO, including (if directed) in consultation with the Ngaanyatjarra Council, as per Condition 4-6(2) of the Ministerial Statement 1188 (20 April 2022). The addition or change of infrastructure within the project that has the potential to significantly change the predicted direct or indirect impacts related to groundwater, that was not approved as a part of the project and would require regulatory approval (e.g. the construction of an additional TSF or WRD, the addition of new dewatering or borefield infrastructure). Any change in operational practices on site that has the potential to significantly change the predicted direct or indirect impacts related to groundwater, and that was not approved as a part of the project and would require regulatory approval (e.g. an increase in abstraction rate, a change in the construction or operational methodologies associated with the TSF or WRD). A change in understanding, status, nature or scale of potential GDEs and/or beneficial users related to this GMMP (e.g. the addition of new third-party groundwater users, identification of additional plant species dependent on groundwater and/or a further understanding of the EWRs and EWPs (WRC, 2000) related to existing identified GDEs). Any changes to this GMMP may require approval from EPA and may involve consultation with relevant stakeholders. 	NR	 The last amendment of the GMMP (Revision 3a) was submitted to DWER on 25 July 2022. A further revision was not required within the reporting period, however a review and rationalisation of the GMMP is currently underway and scheduled for completion Q4 2024.



Terrestrial Groundwater Dependant Ecosystem Uncertainty Studies EMP Audit Table -Table 8

Objective: To maintain the hydrological regimes and quality of groundwater...so that environmental values are protected

Key Environmental Values: Ecosystem health of potential groundwater dependent terrestrial vegetation and beneficial use of groundwater

- Change to groundwater quality and quantity adversely impacts beneficial use and ecosystem health. The changes may arise due to:
 - o Groundwater drawdown associated with groundwater supply development and mine dewatering
 - o Evaporative losses of groundwater from final pit voids, and interaction between pit void(s) and groundwater

Uncertainty	Management Actions	Monitoring	Timings	Compliance Status	Evidence
Uncertainty 1: The hydrogeological numerical model has been informed by data collected from 20 groundwater test bores, a program of geological drilling and geophysical methods. Uncertainty is inherent in most hydrogeological models and will be further refined as part of ongoing geophysical test work, model refinements, and through the adaptive management of the borefield during the project operations, in particular assessing borefield predictions against hydrographs to confirm that the borefield is behaving as predicted.	Monitor rates of drawdown from bores located near to abstraction sites (inside of borefield and mine area groundwater contours) against end of operations hydrographs to confirm that predicted water table drawdown is not significantly different than predicted. Note: where rates of drawdown across the monitoring network are significantly different to those modelled across hydrographs a revision of the hydrogeology model will be triggered to confirm any potential deviation in groundwater contours against existing predictions (as presented herein).	 Water levels at mine monitoring bores MMB-05 to MMB-08 using transducer, dipping or similar. Water levels at borefield monitoring bores BMB-06a to BMB-09a and BMB-06b to BMB- 09b using transducer, dipping or similar. 	 Monthly monitoring of water levels for the first two years of operation or until stabilisation has been reached and the drawdown contours are behaving consistently with hydrographs. Review against hydrographs to occur quarterly. Conformation of whether hydrogeology model updates are needed will occur following the collection of 12 months of data. 	С	 The project is still in construction and the Northern Borefield and mine dewatering bores have not been established. The required monitoring and management actions are not yet relevant. Water levels are being monitored at the installed mine monitoring and borefield bores in accordance with the progressive implementation of monitoring infrastructure during the construction and commissioning period. The groundwater model is currently being updated (EMM 2024 – report in preparation), including improvements to the model mesh and geometry, and re-history matched using additional transient water level and aquifer testing data, and is currently being used to refine the predicted impacts associated with Project water affecting activities, incorporating predictive uncertainty.
Uncertainty 2: While flora and vegetation surveys have been undertaken in much of the area encompassing the predicted 2 m drawdown contour, some areas remain unsurveyed largely due to cultural heritage access restrictions. As a result, there may be some additional areas of potential terrestrial GDEs that remain unsurveyed within the predicted drawdown contours.	potential terrestrial GDE associations	Vegetation mapping using high- resolution aerial imagery, and where necessary, and where access allows, ground truthing using the establishment of vegetation survey quadrats.	Prior to the commencement of mine dewatering and borefield abstraction.	C	 To avoid the need to physically access cultural heritage areas, BHP, in consultation with the Traditional Owner group (Ngaanyatjarra Community, NgC), is considering alternative approaches for identification and monitoring of potentially groundwater dependent vegetation, for example, by remote sensing techniques and capacity building in order for the local indigenous ranger team to conduct on-ground monitoring activities, where appropriate. A GDE ecohydrology assessment was undertaken by AQ2 to expand on previous groundwater dependent vegetation assessment work conducted by AQ2 and CDM Smith. The AQ2 report of November 2023 presented a conceptual ecohydrological model for the Project area vegetation, with a focus on the most likely groundwater using species Corymbia opaca. The study consisted of an additional ecohydrological spatial data analysis (desktop assessment) involving a more extensive and finer resolution dataset than previously used, alternate remote sensing indices and the results of updated numerical groundwater modelling. The report provided additional information around the status of vegetation types identified as potential GDEs and includes information on vegetation health, as observed during a field investigation. The report makes recommendations for possible future work to further validate the conceptual ecohydrological model. The assessment concluded that it is highly likely vegetation in the Project area does not have a connection with groundwater, owing to the presence of massive silcrete above the water table that is impenetrable to plant roots. It also provides hypotheses for the occurrence of Corymbia opaca despite the silcrete barrier.



Objective: To maintain the hydrological regimes and quality of groundwater...so that environmental values are protected

Key Environmental Values: Ecosystem health of potential groundwater dependent terrestrial vegetation and beneficial use of groundwater Key Impacts and Risks:

- Change to groundwater quality and quantity adversely impacts beneficial use and ecosystem health. The changes may arise due to:
 - o Groundwater drawdown associated with groundwater supply development and mine dewatering
 - o Evaporative losses of groundwater from final pit voids, and interaction between pit void(s) and groundwater

Uncertainty	Management Actions	Monitoring	Timings	Compliance Status	Evidence
					 The report was peer reviewed on behalf of the NgC in March 2024. As a result of the peer review and subsequent consultation with the NgC, it was agreed that additional remote sensing work, focusing specifically on the potential for impacts on Desert Oaks (<i>Allocasuarina decaisneana</i>) would be conducted. The major constraint on such a study is that access to areas where Desert Oaks occur is outside of the Development Envelope and Mining Agreement area and restricted to BHP personnel due to cultural sensitivities. An independent peer review conducted by Dr Richard Cresswell of
					EcoLogical, queried some of the findings and limitations described in the AQ2 report in March 2024, the responses to which are currently being reviewed and prepared.
					Whilst not listed as an uncertainty in the GMMP, BHP is committed to continue investigations to determine the groundwater reliance, if any, of Desert Oaks and to develop a record of baseline condition prior to commencement of mining operations. BHP has obtained a proposal from Stantec (April 2024) to compile a monitoring process for Desert Oak utilising remote sensing, together with on-ground assessment that is to be undertaken by Traditional Owners. The monitoring procedure allows for both qualitative and quantitative assessment of the condition of Desert Oaks to understand trends over time. It proposes to use multispectral satellite images to deduce the condition of Desert Oak individuals and populations and derive the historical condition of populations and individuals. The proposal is currently under review by BHP.
Uncertainty 3: The terrestrial GDE assessment has relied on literature, remote- sensing imagery, and professional judgement to identify vegetation associations/mosaics that may represent terrestrial GDEs that could be impacted by the project. Field studies (e.g. measurements of leaf water potentials, etc) could supplement this data to further reduce uncertainty.	 Undertake field-based terrestrial GDE assessments to identify the degree of groundwater dependence (if any) of key plant species within vegetation associations and mosaics identified as possible terrestrial GDEs to determine environmental water requirements. Field-based terrestrial GDE assessments of a stand of Desert Oaks (<i>Allocasuarina decaisneana</i>) known as Exclusion Zone 2, 7.6 km from the main development area (outside all known drawdown contours). Invite the Ngaanyatjarra Council (and their associated specialists) to be involved in the scoping of terrestrial GDE assessments. The Ngaanyatjarra Ranger Team will be invited to participate in any field-based terrestrial GDE survey activities (subject to 	Conduct the following analysis on a minimum of 10 potential terrestrial GDE trees (or as otherwise agreed with EPA or an appropriately qualified ecohydrology specialist) within each identified potential terrestrial GDE: • Leaf water potential (LWP) measurements • Stand/stem basal area calculation • Measure isotopic composition of groundwater, soil water and plant (xylem) water	Prior to the commencement of mine dewatering and borefield abstraction.	C	 An updated ecohydrogeology study has been completed (AQ2 2023 – report under review) that suggests previously identified potentially groundwater dependent vegetation are unlikely to use/rely on groundwater (i.e water needs are likely to be wholly met by soil moisture replenished by rainfall), however BHP is continuing to consider whether additional investigations are required to fully address this uncertainty. Field-based terrestrial GDE assessment were conducted as part of the AQ2 Study (November 2023) and were utilised to provide further clarity around the status of vegetation types identified as potential GDEs. A field-based assessment of a stand of Desert Oaks (<i>Allocasuarina decaisneana</i>) known as Exclusion Zone 2, 7.6 km from the main development area could not be conducted as part of the AQ2 assessment, or prior assessments, due to being located outside of the Development Envelope and the Mining Agreement area, where Project Operations are not permitted to occur as per the relevant clauses of the Mining Agreement. The Desert Oaks are



Objective: To maintain the hydrological regimes and quality of groundwater...so that environmental values are protected

Key Environmental Values: Ecosystem health of potential groundwater dependent terrestrial vegetation and beneficial use of groundwater Key Impacts and Risks:

- Change to groundwater quality and quantity adversely impacts beneficial use and ecosystem health. The changes may arise due to:
 - o Groundwater drawdown associated with groundwater supply development and mine dewatering
 - o Evaporative losses of groundwater from final pit voids, and interaction between pit void(s) and groundwater

Uncertainty	Management Actions	Monitoring	Timings	Compliance Status	Evidence
	fair and reasonable commercial terms)				associated with areas of cultural sensitivity, which also limits access by BHP personnel or consultants to undertake in-field monitoring.
				•	Data and measurements utilised by AQ2 to support the conclusion that plants use water from the unsaturated zone includes:
					 The shallow depth of the silcrete/calcrete
					 The low tree densities, indicating that trees are associated with localised deeper pockets of soil on the calcrete plains that receive localised runoff.
					 Negative pre-dawn leaf water potential
				•	An updated ecohydrogeology study has been completed (AQ2 2023) that suggests previously identified potentially groundwater dependent vegetation are unlikely to use/rely on groundwater (are likely to be wholly met by soil moisture replenished by rainfall), however BHP is continuing to consider whether additional investigations are required to fully address this uncertainty.
				•	Under the Stantec proposal to develop a GDE monitoring procedure, Traditional Owners will be involved in the in-field collection of data associated with the Desert Oaks.



Objective: To maintain the hydrological regimes and quality of groundwater...so that environmental values are protected

Key Environmental Values: Ecosystem health of potential groundwater dependent terrestrial vegetation and beneficial use of groundwater

- Change to groundwater quality and quantity adversely impacts beneficial use and ecosystem health. The changes may arise due to:
 - o Groundwater drawdown associated with groundwater supply development and mine dewatering
 - Evaporative losses of groundwater from final pit voids, and interaction between pit void(s) and groundwater

 Evaporative losses of grounds 	water from final pit voids, and interaction between	pit void(s) and groundwater			
Uncertainty	Management Actions	Monitoring	Timings	Compliance Status	Evidence
Uncertainty 4: Further studies, coupled with ongoing monitoring, is required to better understand the tolerance of terrestrial GDEs to water table drawdown, and thereby inform the (Environmental Water Provision) EWP required to sustain ecosystem function. This work would support the setting of site-specific criteria for EWPs. Note: ongoing assessment of EWP would only be required should the baseline assessment (detailed in Uncertainty 3) confirm that identified potential terrestrial GDE associations, are groundwater dependent.	 Assess environmental water requirements of potential terrestrial GDEs and quantify suitable EWPs for all identified terrestrial GDEs identified within the impacted area (i.e. within the 2 m drawdown contour). Based on these studies refine water table drawdown and groundwater quality EWP that are considered protective of ecosystem health and update trigger criteria, threshold criteria and management within this GMMP as required. The Ngaanyatjarra Council will be invited to comment on the establishment of site-specific criteria for GDE EWPs The Ngaanyatjarra Ranger Team will be invited to participate in any field based terrestrial GDE survey activities (subject to fair and reasonable commercial terms) 	 Undertake ongoing seasonal monitoring, for a period adequate to reduce uncertainty, comprising: LWP Water table depth (continuous data collection using a transducer or similar) 	Ongoing seasonal monitoring to be undertaken quarterly following the commencement of mine dewatering and borefield abstraction.	C	 BHP is currently considering the need for ongoing hydrogeological investigations to investigate potential seasonality of groundwater use, if any, and where reliance is inferred, to assist with understanding the potential water requirements of the ecosystem. Further studies that have been recommended by AQ2 include: End of dry season LWP / leaf moisture content Re-measurement of <i>C.opaca</i> stem diameter for determination of long-term stem growth increments Further quantification of <i>C.opaca</i> lateral root system morphology Water table monitoring in and around mining areas and sentinel bores in sensitive areas is ongoing. These studies and quarterly monitoring will be commenced once mine dewatering and the abstraction at the northern borefield has commenced. BHP is currently considering the need for ongoing hydrogeological investigations to investigate potential seasonality of groundwater use, if any, and where reliance is inferred, to assist with understanding the potential water requirements of the ecosystem.



Outcomes Based EMP for Groundwater - Table 12

Key Environmental Values: Ecosystem health of potential groundwater dependent terrestrial vegetation and beneficial use of groundwater

- Change to groundwater quality and quantity adversely impacts beneficial use and ecosystem health. The changes may arise due to:
 - o Groundwater drawdown associated with groundwater supply development and mine dewatering
 - o Evaporative losses of groundwater from final pit voids, and interaction between pit void(s) and groundwater
 - Seepage from mine waste landforms (TSF and WRDs)
 - o Release of water or hazardous materials from potential contaminant sources (including WRDs, TSF, hazardous goods storage areas and equipment)

o Release of Water (
Outcome	Criteria	Monitor	Frequency	Reporting	Compliance Status	Evidence	
Outcome 1: Groundwater management infrastructure operates as per design to minimise adverse impacts to environmental values	 Trigger Criteria: 68% of the predicted drawdown at 2 m water table drawdown contour, and/or a reference site near Jameson over two consecutive monitoring events Monitoring bores within drawdown contours (inside of borefield and mine area groundwater contours) against end of operations hydrographs to confirm that predicted water table drawdown is not significantly different than predicted. Note: where rates of drawdown across the monitoring network are significantly different to those modelled in hydrographs a review or revision of the hydrogeology model will be triggered to confirm any potential deviation in groundwater contours against existing predictions (as presented herein). Threshold Criteria: Equal to the predicted drawdown at 2 m water table drawdown contour and/or a reference site near Jameson at any single monitoring event; and subsequent investigations determine that the impacts are likely a result of the implementation of the proposal 	 Indicator: Groundwater levels Method: Field collection or automation of groundwater level using a transducer or manual dipping. EC and pH would also be collected. Location (Figure 6): Monitoring bores at the 2 m water table drawdown contour: Mine: MMB-01 to MMB-04 Northern Borefield: BMB-01 to BMB-04 and BMB-06a) Near Jameson: CMB-01 Control sites: CMB-01 to CMB-04 Monitoring Bores within the drawdown contours used to confirm accuracy of drawdown predictions: Mine: MMB-05 to MMB-08 Borefield: BMB-06a to BMB-09a and BMB-06b to BMB-09b The Ngaanyatjarra Ranger Team will be invited to participate in any field-based water monitoring activities (subject to fair and reasonable commercial terms) 	 Monthly data collection, A review of this frequency will occur on an annual basis. Quarterly review of drawdown against hydrographs Determination of whether hydrogeology model update is required will occur at the end of 12 months of data collection. 	 Annual compliance assessment report (if the Plan is conditioned under the EP Act) (DWER – Compliance Branch) Annual Aquifer Assessment Report (DWER – Swan-Avon Region) Triennial (every three years) Aquifer Review (DWER – Swan Avon Region) 	• •	Water levels trends were measured by both automatic pressure transducers as well as manual dips. Water levels across the mining area and Northern Borefield in all HSU s were generally stable, consistent with the minimal groundwater abstractions occurring for construction during the reporting period. The exception is BMB-10D in the Pidinga Formation in the Northern Borefield, which shows an instantaneous decline of around 1.5m in April 2023, which is likely to be caused by a logger deployment issue (as no abstraction has occurred in the region and no other bores show this type of trend). Given the Project is within the construction period, the nominated monitoring locations that require monitoring for drawdown trends, against defined triggers have not yet been installed (BMB-04S, BMB-04D BMB-06S, BMB-06D). However, it is considered unlikely that any drawdown attributable to the Project would be occurring in the areas nearby identified receptors (Jameson, Linton Bore), given the very limited groundwater abstractions occurring onsite (<10% of entitlement, limited to construction supply bores in the Mining area). Following the recent groundwater model update (EMM 2024 -report in preparation) and ongoing predictions, it may be considered appropriate to revise the triggers based on probabilistic outcomes, to provide more robust	



Key Environmental Values: Ecosystem health of potential groundwater dependent terrestrial vegetation and beneficial use of groundwater

- Change to groundwater quality and quantity adversely impacts beneficial use and ecosystem health. The changes may arise due to:
 - o Groundwater drawdown associated with groundwater supply development and mine dewatering
 - o Evaporative losses of groundwater from final pit voids, and interaction between pit void(s) and groundwater
 - o Seepage from mine waste landforms (TSF and WRDs)
 - o Release of water or hazardous materials from potential contaminant sources (including WRDs, TSF, hazardous goods storage areas and equipment)

Outcome	Criteria	Monitor	Frequency	Reporting	Compliance Status	Evidence
						metrics for preventing impacts. The Northern Borefield has not been constructed and mine dewatering has not commenced during reporting period. Water is abstracted for constructions purposes only well below the abstraction limit. Trigger and threshold criteria are therefore not relevant at present.
						 Groundwater monitoring has been implemented and water balance volumes are maintained in the BHP document management system. Data visualization and bore location maps are managed in the EMM Groundwater Field Data Visualisation tool.
						 Groundwater monitoring limited to areas where BHP has secured access from NgC via the Permit to Work process, in accordance with the Mining Agreement provisions mandating that Project Operations can only occur within the Agreement area and in accordance with an approved Permit to Work.
						 Monitoring of groundwater is confined to existing production and observation wells detailed within the Groundwater Operating Strategy. All monitoring activities were conducted by BHP personnel.
						 Participation in water monitoring activities has been proposed to the Ranger coordinator.
						 The annual Groundwater Monitoring Summary Report, for the period 1 January 2023 to 31 December 2023 was submitted to DWER in March 2024, as per the requirements of GWL207745.



Key Environmental Values: Ecosystem health of potential groundwater dependent terrestrial vegetation and beneficial use of groundwater

- Change to groundwater quality and quantity adversely impacts beneficial use and ecosystem health. The changes may arise due to:
 - o Groundwater drawdown associated with groundwater supply development and mine dewatering
 - o Evaporative losses of groundwater from final pit voids, and interaction between pit void(s) and groundwater
 - o Seepage from mine waste landforms (TSF and WRDs)
 - o Release of water or hazardous materials from potential contaminant sources (including WRDs, TSF, hazardous goods storage areas and equipment)

Outcome	Criteria	Monitor	Frequency	Reporting	Compliance Status	Evidence
Outcome 2: Groundwater management infrastructure will be managed to ensure groundwater table drawdown is no greater than 1 m south of Linton Bore (towards the Cavanaugh Range)	 Trigger Criteria: 68% of the predicted 1 m drawdown at a monitoring bore adjacent to Linton Bore over two consecutive monitoring events (in comparison to a reference bore). And/or rate of drawdown at Linton Bore is greater than 0.1 m/year (over and above natural variation) over a 12-month period. Threshold Criteria: Equal to the predicted 1 m water table drawdown at a monitoring bore adjacent to Linton Bore at any single monitoring event (in comparison to a reference bore); and subsequent investigations determine that the impacts are likely a result of the implementation of the proposal. And/or rate of drawdown at a site adjacent to Linton Bore is greater than 0.2 m/year (over and above natural variation) over a 12-month period. 	 Indicator: Groundwater levels and hydrograph Method: Field collection or automation of groundwater level using a transducer or manual dipping. EC and pH would also be collected. Location (Figure 6): Monitoring bores near Linton Bore (BMB-00) Control sites: CMB-01 to CMB-04 The Ngaanyatjarra Ranger Team will be invited to participate in any field-based water monitoring activities (subject to fair and reasonable commercial terms) 	Monthly data collection A review of this frequency will occur on an annual basis Quarterly review of drawdown against hydrographs		NR	The triennial review will be due March 2025 and will be provided with the next CAR. Monitoring at this location (Linton Bore and further south) has not been able to be undertaken at this stage as land access for the installation of monitoring bores to monitor impacts on Linton Bore is outside of the Mining Agreement area and within culturally sensitive areas. Monitoring at Linton Bore would require an installation of an additional monitoring bore, which has not been possible due to restricted access to the area. Abstraction for the Project has been limited during the construction phase (7.99% of 7.5 GL/yr allocation during the reporting period). The Northern Borefield has not been developed and mine dewatering has not commenced to date. The Ngaanyatjarra Ranger Team have been invited to participate in field-based water monitoring activities within the Mining Agreement area, and future opportunities to undertake these activities within areas outside of the Agreement area, such as Linton Bore, will be discussed with the Ranger team. Discussions with NgC ongoing as to future compliance with this requirement and alternative methods
						to satisfy requirements.



Uncertainty	Criteria	Monitor	Frequency	Reporting	Compliance Status	Evidence
Outcome 3: No adverse impacts to groundwater quality outside of assessed impact areas as a result of implementing the proposal	Trigger Criteria: An exceedance of groundwater quality guideline values (see Table 9) in comparison to reference sites over two consecutive monitoring events	 Indicator: Hydrochemistry concentrations Method: Field sample collection and laboratory analysis Location (Figure 6): Selected reference sites as 'threshold locations' downstream of key project infrastructure (TSF, WRD and processing plant) Selected reference sites as 'control 	Quarterly		С	Abstraction for the Project has been limited during the construction phase (7.99% of 7.5 GL/yr allocation during the reporting period). Northern Borefield has not been developed and mine dewatering has not commenced. Groundwater monitoring has
	Threshold Criteria: An exceedance of site- specific background threshold criteria in any single monitoring event in comparison to reference sites; and subsequent investigations	 locations' upstream from key project infrastructure The Ngaanyatjarra Ranger Team will be invited to participate in any field-based water monitoring activities (subject to fair and reasonable commercial terms) 				been implemented as above. Of the 42 nominated/planned monitoring bores, 8 have been installed and monitoring has begun at all installed bores. These bores are all sampled monthly.
	determine that the impacts are likely a result of the implementation of the proposal				•	Groundwater monitoring limited to areas where BHP has been granted access by NgC via the Permit to Work process.
						Monitoring of groundwater confined to existing production and observation wells detailed within the Groundwater Operating Strategy. All monitoring activities were conducted by BHP personnel.
						No significant trends in water level or pH were observed for any HSU or the mining area during the reporting period. However, at BMB10-D, the measured EC is consistently (i.e. stable) above the defined trigger, indicating there is statistical limitations in the baseline range, given no causal effect near this bore is noted (due to limited site activities).
						Sulphate exceedances were recorded in four (4) locations across the mining area (MMB-01 and MMB-02) and Northern Borefield (BMB-05S and BMB10-S) although these exceedances are not inferred to be attributable to the Project, given the limited site activities and are likely a reflection of statistical limitations in the
						baseline range. No Copper or Nickel trigger levels were exceeded during the reporting period, with measured



Uncertainty	Criteria	Monitor	Frequency	Reporting	Compliance Status	Evidence
					Julius	concentrations well below defined triggers. The Ngaanyatjarra Ranger Team has been invited to participate in field-based water monitoring activities.
Outcome 4: No adverse impact to confirmed terrestrial GDEs outside of the 2 m water table drawdown contour. Note: This outcome would only be relevant should the baseline potential terrestrial GDE program confirm the presence of GDEs, and if confirmed, this outcome would only occur should the trigger criteria for Outcome 1 be triggered	 Trigger Criteria: A statistically significant difference in primary parameter (Appendix B) trends at sites of confirmed terrestrial GDEs between the 2 m and 0.5 m water table drawdown contours compared to baseline monitoring values over two consecutive monitoring events Threshold Criteria: A statistically significant difference in primary parameter (Appendix B) trends at sites of confirmed terrestrial GDEs between the 2 m and 0.5 m water table drawdown contours compared to reference sites over four consecutive monitoring events; and subsequent investigation determine that the impacts are likely a result of the implementation of the proposal 	 Indicator: Vegetation health and condition (Appendix B) Method: Visual assessment of vegetation health (photos and visual assessment), collection of leaf water potential data, and/or more regional methods such as NDVI or LiDAR to evaluate tree heights. Location (Figure 6): At locations of confirmed terrestrial GDEs between the 2 m and 0.5 m water table contours (TBA based on uncertainty surveys detailed in Table 8) Control sites away from key project infrastructure, and their potential impacts (if available) The Ngaanyatjarra Ranger Team will be invited to participate in any field-based water monitoring activities (subject to fair and reasonable commercial terms) 	In the event that groundwater trigger criteria detailed in Outcome 1 or Outcome 2 are triggered, visual assessments and collection of leaf water potential would occur quarterly	 Annual compliance assessment report (if the Plan is conditioned under the EP Act) (DWER – Compliance Branch) Exceedance reporting (on trigger and threshold criteria) (DWER – Compliance Branch) Reporting on contingencies 	NR	 To clarify the uncertainty concerning GDEs, it was agreed with the NgC that additional remote sensing work, focusing specifically on the potential for impacts on Desert Oaks (Allocasuarina decaisneana) would be conducted. The major constraint on such a study is that access to areas where Desert Oaks occur is outside of the Development Envelope and Mining Agreement area, and restricted due to cultural sensitivities. BHP has obtained a proposal from Stantec (April 2024) to compile a monitoring process for Desert Oak utilising remote sensing, together with on-ground assessment that is to be undertaken by Traditional Owners. The monitoring procedure allows for both qualitative and quantitative



Uncertainty	Criteria	Monitor	Frequency	Reporting	Compliance Status	Evidence
						assessment of the condition of Desert Oaks to understand trends over time. It proposes to use multi-spectral satellite images to deduce the condition of Desert Oak individuals and populations and derive the historical condition of populations and individuals. The proposal is currently under assessment by BHP.
Outcome 5: No adverse impact to vegetation within the Desert Oak Heritage Exclusion Zone	 Trigger Criteria: A statistically significant difference in vegetation health and condition at designated monitoring sites within exclusion zone 2 (Appendix B) compared to baseline monitoring values over two consecutive monitoring events Threshold Criteria: A statistically significant difference in vegetation health and condition at designated monitoring sites within the exclusion zone 2 (Appendix B) compared to baseline monitoring values over four consecutive monitoring events and subsequent investigation determine that the impacts are likely a result of the implementation of the proposal. 	 Indicator: Vegetation health and condition Method: Visual assessment of vegetation health (photos and visual assessment). Location (Exclusion Zone 2) The Ngaanyatjarra Ranger Team will be invited to participate in any field-based vegetation health monitoring activities (subject to fair and reasonable commercial terms) 	Annual	 Annual compliance assessment report (if the Plan is conditioned under the EP Act) (DWER – Compliance Branch) Exceedance reporting (on trigger and threshold criteria) (DWER – Compliance Branch) 	NR	Abstraction for the Project has been limited during early construction phase (<10% of total allocation). The Northern Borefield has not been developed and mine dewatering has not been required to date. Access to the Desert Oak Exclusion Zone has been restricted due to their location, which has prevented commencement of baseline monitoring. Accessing Desert Oaks for monitoring and assessment purposes is still under discussion with NgC. As these are located outside of the Development Envelope and the Mining Agreement area, where Project Operations are not permitted to occur as per the relevant clauses of the Mining Agreement. BHP has obtained a proposal from Stantec (April 2024) to compile a monitoring process for Desert Oak utilising remote sensing, together with on-ground assessment that is to be undertaken by Traditional Owners. The monitoring procedure allows for both qualitative and quantitative assessment of the condition of Desert Oaks to understand trends over time. It proposes to use multi-spectral satellite images to deduce the condition of Desert Oak individuals and populations and derive the historical condition of populations and individuals. The proposal is currently under assessment by BHP.



APPENDIX 4 - AUDIT FINDINGS FOR GMMP IMPLEMENTATION

Uncertainty	Criteria	Monitor	Frequency	Reporting	Compliance Status	Evidence
						 Discussions with NgC are ongoing to identify alternative remote vegetation condition monitoring techniques that may be acceptable.





A5. APPENDIX 5 - AUDIT FINDINGS FOR TFMP IMPLEMENTATION

Terrestrial Fauna Management Plan Audit Table

TFMP Reference	Element	Requirements	Compliance Status	Evidence
1.4.3	Management Approach Table 12: Minimisation Measures for Direct Impacts to Significant Fauna	A considerable effort was made as part of the S38 application to reorient and reduce the size of Development Envelope to avoid impacts to environmental values. This included a reduction of the Development Envelope from 25,200 ha to 21,679 ha (13.3% reduction), and of the disturbance footprint from 3,961 ha to 3,830 ha resulting in the exclusion of some areas known to support significant fauna (such as the formally proposed Western Access Road and parts of the Southern Monitoring Area where deep sand spinifex occur). Under Attachment 1 to MS1188 (s45 C amendment) the clearing footprint has been increased from 3,830 ha to 4,213.3 ha.		 The requirements will be updated to reflect the amended clearing footprint following the submission of the revised TFMP to address the Section 45C decision report issued 02 February 2024. A considerable effort was made as part of the S45C application to maintain the size of Development Envelope to avoid impacts to environmental values including exclusion of some areas known to support significant fauna (such as the formally proposed Western Access Road and parts of the Southern Monitoring Area where deep sand spinifex occur). The increased clearance area required assessment and justification for each contributing piece of infrastructure. Clearing is less than the approved amount and is all within the approved Development Envelope. Cumulative clearing as 31 March 2024 is 597.4 ha.
		Adjustment of the Development Envelope to exclude habitat known to support significant species (excluded 82 % of Spinifex Sandplain habitat)	С	 Measures to avoid impacts to Sandplain Spinifex habitat are implemented, where possible, including redesign to avoid active skink burrows. No Spinifex Sandplain habitat was cleared during the reporting period. A pre-clearance survey by Lathwida was conducted in April 2023, enabling the design of the pipeline alignment, however due to delays, the pre-clearance required for actual clearing for sandplain spinifex has yet to occur. The Ranger team and TOs have been present for pre-clearing around existing pads developed during the exploration phase of the Project adjacent to SandPlain Spinifex habitat.
		Avoidance through informed design by minimising clearing to the smallest area possible and placing waste in-pit where practicable	С	 Land clearing for the reporting period is 259.8 Ha, bringing the cumulative clearing total to 597.4Ha. No mining waste was produced during reporting period as the project is in construction phase.
		Avoidance or minimisation through informed design by avoiding clearing of habitat for conservation-significant species and, where practicable, micro-sighting infrastructure during construction to avoid significant habitats	С	 A pre-clearance survey was done by Lathwida Environmental before first clearing in areas adjacent to Sandplain spinifex habitat commenced in April 2023. A record of the survey is maintained in the BHP document management system. Additional pre-clearance surveys were conducted by the Ng Ranger group prior to clearing works associated with existing drill pads adjacent to Sandplain Spinifex habitat. Records of pre-clearance surveys are maintained in the BHP document management system. A Register of GDS burrow locations is maintained and new burrow locations are added as and when discovered. Spatial data is maintained in the WMP central GIS database, including 50 metre buffer zones around known burrows. These buffer areas have also been pegged in the field using environmental pegs (blue and white striped caps on fence droppers). Works have been redesigned to avoid known skink burrows. Records of quarterly verification of land disturbance and exclusion zones are maintained in the AGOL-based LADP system to ensure no unauthorised ground disturbance or impacts to fauna has occurred.
		Siting of turbines outside of habitats known to support significant fauna species	NR	No turbines constructed to date.
		Consideration of the swept height of wind turbine blades above the vegetation canopy for wind farm design and development	NR	No turbines constructed to date.
		Exclusion of the use of barbed wire fencing to minimise impacts to bats and avian fauna	С	No barbed wire fencing has been installed on the project. Use of barbed wire has not been supported due to propensity of Camels to rub against the barbed wire and impact fencing integrity.
		Development and implementation of a site-specific internal land and clearing/disturbance procedure and associated permit to prevent clearing outside approved boundaries, and to minimise disturbance to only that required	С	 Construction - Land Access and Disturbance Procedure - issued for use 20/03/2023. All proposed works must have an approved LADP prior to commencement.



TFMP Reference	Element	Requirements	Compliance Status	Evidence
1.4.3	Management Approach Table 12: Minimisation Measures for Direct Impacts to Significant Fauna	Development and implementation of a site-specific internal land and clearing/disturbance procedure and associated permit to prevent clearing outside approved boundaries, and to minimise disturbance to only that required	С	Records of quarterly verification of land disturbance and exclusion zones are maintained in the AGOL-based LADP system.
		The site induction program would provide information on protection of significant fauna habitats and land access and disturbance authorisation procedures	С	The site induction is mandatory for all employees and contractors. It contains extensive information on the protection of fauna including priority and threatened fauna (Great Desert Skink, Brush Tail Mulgara, Striated Grasswren, Southern Marsupial Mole), fauna habitat and the application inf the LADP system at WMP.
		A pre-clearance survey would be undertaken in Spinifex Sandplain to ensure that proposed clearing is aligned away from signs of Great Desert Skink	С	 Pre-clearance survey undertaken by Lathwida Environmental or Ng Ranger group prior to any proposed clearing work and to support project design to avoid GDS active burrows. Records of pre-clearance surveys are maintained in the BHP Document Management System. No Spinifex Sandplain habitat cleared during the reporting period.
		Implementation of a Feral Animal Monitoring and Control Program	C	 A pest fauna baseline assessment was conducted December 2023 to January 2024 in order to define the current pest fauna populations within the WMP development envelope. The findings of the baseline assessment were then used to develop a draft Pest Fauna Management Plan, which is currently with NgC for review. Quarterly feral fauna audits are conducted assess the management of fauna attractants, feral fauna sighting and interaction trends, and the delivery of feral fauna management interventions such as training and communication. Findings of the audits are maintained in the BHP document management system and actions raised in the BHP event management system as required. Workplace inspections conducted nominally fortnightly review infrastructure status, such as fencing, where installed and any pest fauna sighting, noting the landfill was not operational as of 20 April 2024. Pest and feral fauna observations and interactions are recorded in the BHP event management system to enable trend analysis and management measures to be implemented based on such trends. Wild dog (including dingo) interactions are logged in the BHP event management system. Where required management actions are sought to be implemented in consultation with the NgC. Feral and Pest animal management measures are included in induction material and a series of awareness sessions regarding wild dogs have been delivered to the workforce. Rodent control actions are undertaken by registered pest control service providers and records are maintained.
		 Various aspects of the conceptual and detailed design of the wind farm and individual turbines would take into account the following design features to reduce the risk of avian fauna and bat mortalities: Design of turbine towers with solid structure turbines, as opposed to lattice style structures to prevent birds, particularly raptors, using the turbines as perching and/or nesting locations, increasing the likelihood of rotor collision. 	NR	Turbine design has not been selected at time of this audit.
		 Size of turbines would be as large as practicable to allow the turbines to be more visible to avian fauna species and have lower blade rotational speeds than smaller turbines. Turbines would be designed to create less edges where possible. Provision of visibility enhancement devices. 		
		Progressive rehabilitation would be undertaken on disturbed areas as they become available	NR	Due to the project being in construction, rehabilitation is not yet relevant. Where possible, bore pads and geotechnical testing disturbance areas are rehabilitated upon confirmation that they will not be used in future.



TFMP Reference	Element	Requirements	Compliance Status	Evidence
1.4.3	Management Approach	Monitoring of analogue and rehabilitated areas would be undertaken to ensure short, medium and long-term rehabilitation objectives are achieved	NR	Project in construction phase. No rehabilitation work has commenced to date.
	Table 12: Minimisation Measures for Direct Impacts to Significant	Ongoing development of monitoring methodology and rehabilitation techniques would occur during the life of the project. Further assessments over time would plot the development of rehabilitated areas against analogue sites and progression towards completion targets	NR	 Project in construction phase. Seed harvesting program design currently under preparation including the engagement of the Indigenous Ranger group.
	Fauna	Preparation and regular update of a Mine Closure Plan consistent with DMIRS and EPA Guidelines for Preparing Mine Closure Plans (DMIRS, 2020)	С	Mine Closure Plan (MCP) Reg ID 103201 approved 11/08/2022 and most recently revised 18 January 2024. The first revision is due August 2027.



FVMP Reference	Element	Requirements	Compliand Status	e	Evidence
1.4.3	Management Approach Table 13: Minimisation Measures for Indirect Impacts to Significant Fauna	Firebreaks would be maintained around fixed plant areas	С	•	Firebreak has been established around the perimeter of accommodation camp and is reflected in NgC Cultural Heritage Permit to Work on WMP Camp Firebreak issued 2022. Specifications for the establishment and maintenance of firebreaks are contained in the Bushfire Management Plan. Fixed plant under construction at time of audit. Adequate firebreaks are currently in place around fixed plant.
		Fire management infrastructure would be maintained on site and in vehicles, along with competent persons for the management of bushfires	С	•	Daily vehicle and mobile plant pre-start inspection checks include checks of invehicle fire extinguishers. All fire-fighting equipment is audited quarterly by the relevant contracting partner and by Mercury Fire for BHP-owned firefighting equipment. ERT training schedule includes fire and rescue and is undertaken on a weekly basis. The Bushfire Management Plan was issued for use in August 2022 and contains in formation in firefighting equipment and firefighting training.
		A Hot Works procedure would be put in place to ensure adequate controls are put in place for activities that have the potential to result in bushfire	С	•	All hot works outside designated workshop areas are subject to first obtaining a hot works permit. Records of hot work permits are maintained by the various contracting partners and BHP Site Services. Compliance to the hot work permit system is subject to regular WHS workplace inspections and audits. During total fire ban periods, DFES is notified by Site ERT prior to the commencement of hot works, where applicable.
		Fire management protocols and land management would be consulted with the Ngaanyatjarra Council to ensure that aligned fire management outcomes are achieved	С	sup pro	nd management using controlled burns has been discussed with NgC and is not pported at this time. The current approach is to ensure adequate firebreaks around otected assets through removal of vegetation via grading. Further consultation with e NgC is anticipated.
2.3.1	Reporting Ngaanyatjarra Council and Ngaanyatjarra People	All reporting discussed in Section 2.3 of the TFMP will be made specifically available to the Ngaanyatjarra People through the Ngaanyatjarra Council, including where necessary periodic face-to-face meetings to discuss the results and outcomes of monitoring.	С	cul rep me Red mii	atutory annual reports and fauna-related incident reports, including reports of lturally significant fauna deaths are made available to the NgC and the contents of ports are discussed during regular heritage and environment and approvals eetings, as well as during quarterly Heritage and Liaison committee meetings. Ecords of the provision of reports and the discussion of results are captured in the nutes of meetings that are maintained in the secure folders in SharePoint for infidentiality considerations.
2.3.2	Annual Reporting	OZ Minerals will prepare Annual Environmental Reports (AERs) to be submitted to regulatory authorities.	С	The	e first report was submitted to the DEMIRS in August 2023.
		A Compliance Assessment Report (CAR) will be submitted to the Compliance Branch at Government of Western Australia's Department of Water and Environmental Regulation (DWER) at an agreed date.	С	Thi	is document forms part of the second CAR that is due on 20 July 2024.
2.3.3	Incident Reporting	In recognition of the conservation status of the four species of significant fauna described in this TFVMP, OZ Minerals will report deaths directly attributable to the project. Relevant regulatory authorities (EPA, DBCA and Department of Mines, Industry Regulation and Safety (DMIRS)) will be notified within seven days of the death being recorded.	С	dui	deaths of one of the four species of conservation significant fauna were recorded iring the reporting period. Records of all reported fauna deaths are captured in the IP event management system.



FVMP Reference	Element	Requirements	Compliance Status	Evidence
2.3.4	Reporting to the Ngaanyatjarra Council	OZ Minerals will report key data from this TFMP to the Ngaanyatjarra Council, including: Fauna deaths attributable to the WMP, including mortalities of species considered significant to the Ngaanyatjarra people. Feral animal monitoring outcomes. These would be reported and/or presented in accordance with consultation and/or reporting schedules nominated within the Mining Agreement.	C	 All project-attributable fauna deaths, including of species considered culturally significant by the Ngaanyatjarra People are recorded in BHP event management system and reported to the NgC. During the reporting period the following culturally significant animals were killed in vehicle strikes attributable to Project Operations: a goanna on 29/9/2023 a sand goanna on 23/10 2023 a goanna on 13/11/2023 a sand goanna on 7/1/2024 a goanna on 23/1/2024 a juvenile goanna on 1/2/2024 a goanna on 9/2/2024 Due to the increase in incidents in early 2024 targeted awareness material was presented to the workforce and appropriate contractors in February 2024. Record of the email notifications to the NgC is saved in the BHP event management system as records and NgC notified via email. Data is also summarised during the Heritage and Liaison Committee meetings. No conservation significant fauna deaths were recorded during the reporting period. The feral and pest animal monitoring program is ongoing, and records of fauna interactions are kept in the BHP event management system. The results of the pest fauna baseline monitoring conducted December 2023 through to January 2024 were presented to NgC during a pest fauna workshop held Q1 2024. The results provide data to develop the integrated pest fauna management plan, currently with NgC for review. The camel and wild dog management program remains under development with the NGC Camel Company, levels are currently manageable, and any control required is at an individual level for wild dogs only.
3.1	Management Review	 Review processes for the TFMP will be based on formalised dates after project commencement and triggers such as: Monitoring results: If site-specific monitoring program results indicate that management targets are not being achieved. Changes in knowledge: If new information about a species' use of the Development Envelope or region is received which would better inform management approaches. Significant changes to project design: The relevance and effectiveness of existing management measures would be considered and amended as appropriate. This Management Plan will also be reviewed and revised following any significant changes to the project from that described within the EPA Section 38 Referral (OZ Minerals, 2021). OZ Minerals will also review this plan within one year following implementation of the project, including a 	С	 Review commenced Q1 of 2024 arising from Monitoring Results and Changes in Knowledge; to incorporate new knowledge of Great Desert Skink populations and habitat preferences resulting from additional targeted surveys undertaken in Q1/2 2023, as well as integrate recommendation of the Threat Abatement plan for the Great Desert Skink issued by DCCEEW under EPBCA. The revised TFMP is currently under review by NgC prior to submission to address requirements following the Section 45C variation decision report issued 2 February 2024. See above. No significant changes to the Project. Revised plan to be submitted to DWER Q3 2024.
		review of the management actions, monitoring methods and reporting requirements. Following any significant changes, the updated plan will be submitted to DWER for approval.		



TFMP Objective Based EMP Audit Table

Management Objective: Minimise loss of significant fauna habitat and fragmentation as a result of project-related land clearing Key Impacts and Risks:

- Decrease in poorly represented fauna habitat as a result of land clearing for the pipeline and service corridor alignment
- Significant decrease in richness and abundance of fauna, including significant fauna, as a result of interactions with project-related vehicles and machinery or entrapment
- Increase richness and abundance of predator species resulting from project-related attractants (water and food sources) result in higher levels of predation of native fauna

• Decrease in the richness and abundance of poorly represented fauna habitat and significant fauna species as a result of project-related altered fire regimes

- Door case in the heliness and aba	best case in the nonliness and abundance of poorly represented radia habitat and significant radia species as a result of project related after earlier regimes								
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence				
Clearing in accordance with internal land clearing procedure Minimise amount of active cleared land	Total project-related land disturbance is to be within the approved Development Envelope and not to exceed the approved area	Annual reconciliation of land access and disturbance-related survey data with the respective year's aerial imagery Annual review of internal project- related land access and disturbance register relative to actual project- related land disturbance and LADPs	 Internal project-related Land Access and Disturbance Register and LADPs Mining Rehabilitation Fund (MRF) annual reporting Annual WMP Compliance Assessment Report 	С	 All clearing is authorised and controlled under Land Access and Disturbance Permits (LADP). The LADP approval/planning process helps to minimize the extent of land clearing. Monthly assurance is performed for each LADP by the permit holder to ensure compliance, especially with regard to the avoidance of heritage and ecological exclusion areas and remaining within the approved disturbance envelope. Disturbance is reported monthly using data obtained using survey methods. All clearing records are maintained within the ArcGIS Online (AGOL) based LADP system. The first MRF report was submitted to DEMIRS in July 2023. This document forms part of the second CAR that is due on 20 July 2024. 				
Management Objective: Minimise deat	n or injury to significant fauna in the De	velopment Envelope as a result of projec	t-related land clearing						
Management Action	Management Target	Monitoring	Reporting	Compliance	Evidence				

Undertake pre-disturbance surveys:

- in Spinifex Sandplain habitat to map all active Great Desert Skink burrows
- prior to proposed projectrelated land disturbance with adequate lead time (two months is recommended) to allow for design amendment to ensure avoidance of all active Great Desert Skink burrows
- to undertake designation/ demarcation as 'fauna exclusion zones' prior to project-related land disturbance
- Fauna spotter present during all project-related land disturbance in Spinifex Sandplain habitat
- Where relocation of burrows is required, this will be discussed/agreed with the Department of Biodiversity Conservation and Attractions prior to any relocation being undertaken

- No reasonably preventable death or injury to significant fauna attributable to projectrelated land disturbance activities
- No loss of active Great Desert Skink burrows due to projectrelated land disturbance
- The Ngaanyatjarra Ranger Teams will be invited to participate in pre- disturbance monitoring activities (subject to fair and reasonable commercial terms)
- Great Desert Skink burrow location and status data collected during predisturbance surveys.
- Fauna spotter to record observations of significant fauna and burrows during projectrelated land disturbance in Spinifex Sandplain habitat, including written records and photographs, where appropriate
- Records of engagement with the Ngaanyatjarra Council relating to participation in pre-disturbance survey work
- Survey workOpportunistic identification of fauna mortalities

 Pre-disturbance survey records including significant fauna observations and fauna mortality records. Status

 Fauna spotter recorded significant fauna observations including fauna mortality.
 GIS records of pre-

disturbance survey records.

- fauna exclusion zones and locations of significant fauna recorded by fauna spotter.

 Annual WMP Compliance
 - Assessment Report

- A GDS pre-clearance survey was conducted by Lathwida Environmental in April 2023. A record of the survey is maintained in the BHP Document Management System and the spatial data stored in the central spatial database. Additional pre-clearance surveys were conducted prior to all subsequent clearing work adjacent to Sandplain Spinifex habitat, and to inform final design with respect to the pipeline and bore locations. Records of pre-clearance surveys are maintained in the BHP document management system. A Register of GDS burrow locations is maintained and new burrow locations are added, as and when, discovered. Spatial data is maintained in the WMP central spatial database, including 50 metre buffer zones around known burrows. These buffer areas have also been pegged in the field using environmental pegs (blue and white striped caps on fence droppers).
- GDS habitat locations and GDS exclusion areas were defined in the LADP system, that has been used to ensure that ground disturbance is designed to avoid impacts on GDS habitat. Following a further survey by Lathwida in August 2023 the habitat mapping was further refined but did not change materially from previous mapping. Additional habitat definition was conducted April 2024 to better define the habitat preferences of the GDS and maximise survey coverage. Further pre-clearance surveys will be conducted 2-3 months prior to proposed clearing dates in NBF.
- No Spinifex Sandplain habitat was disturbed during the reporting period; however, spotters are utilised during all clearing work in the Northern Borefield (NBF) as a condition of the LADP. Spotters from the community were present during clearing works associated with the access track associated with the extent of the wind turbine generator alignment.
- There were no deaths of conservation significant fauna attributable to project activities recorded during reporting period. The deaths of culturally significant fauna species due to vehicle interactions have been reported to the NgC.
 There was no loss of Great Desert Skink burrows during the reporting period and no relocations were required.



Management Objective: Minimise deat	h or injury to significant fauna as a resu	ult of interactions with project-related veh	nicles or machinery		 Records of invitations to traditional owners to participate in pre-disturbance and disturbance monitoring activities are maintained in the minutes of regular communication between BHP and the NgC as well as the monitoring sheets submitted to NgC after each monitoring event. Pre-clearance survey activities conducted were undertaken by Indigenous Rangers. This document forms part of the second CAR that is due on 20 July 2024.
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
 Speed limits restricted to a maximum of 20 km/hr in close vicinity of Deep Sand Spinifex habitat, 60 km/hr in all other project areas, 80 km/hr on the main northern access road; with appropriate speed limit signage in place. Off-road driving not permitted outside of cleared areas. All fauna-vehicle interactions to be reported with time and location to allow investigation and data collection. Personnel inductions include discussion of speed limit restrictions requirements to report fauna-vehicle interactions and the non-compliance process 	e	 Quarterly review of records of speed limit non-compliances Identification of traffic related fauna mortalities through incident report data collection and investigation 	 Annual WMP Compliance Assessment Report Internal incident reporting and non- compliance reporting Fauna mortality records Induction records Regulatory agency notification of incident for significant fauna 	C One NC	 Speed limits are clearly demarcated on all roads and on tracks and conditioned in LADPs issued for work in and adjacent to GDS habitat. Inductions include on-site driving requirements, prohibition of off-road driving, information on speed limits and fauna "right of way" rules. Induction records are maintained in the BHP human resources and training system. No deaths of any of the four conservation significant fauna species were recorded during the reporting period. Seven culturally significant fauna deaths associated with vehicle interactions occurred during the reporting period, i.e. Six goannas were killed in interactions with WMP vehicles. All fauna deaths are recorded in the BHP event management system for tracking and auditing purposes. All culturally significant fauna deaths are reported to NgC. Speed monitoring is performed informally by observation only. Instances of speeding are recorded in the BHP event management system and appropriate corrective actions implemented. NC: Quarterly reviews of records of speed limit non-compliance were not undertaken during the reporting period, rather reviews are conducted informally, and site notifications issued when repeat speed limit non compliances are detected. Detected speed limit exceedances are entered into the BHP event management system. Review of speed limit non-compliances within WMP is undertaken ad hoc and via campaigns, responses include workforce education and site wide notices. There is no formal mechanism for monitoring speed limit non-compliances during the Project phase and this will be addressed during the operational phase via the use of Vehicle Management Systems in site vehicles. The transitory nature of the Project phase for different workgroups makes mandatory VMS difficult to implement and enforce. This document forms part of the second CAR that is due on 20 July 2024.



Management Objective: Minimise adverse impacts on significant fauna as a result of project-related pipeline construction							
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence		
 Undertake pre-disturbance surveys: in Spinifex Sandplain habitat to map all active Great Desert Skink (GDS) burrows Prior to project-related land disturbance with adequate lead time (two months is recommended to allow for design amendment to ensure a minimum buffer distance of 50 m between active Great Desert Skink burrows and pipelines to undertake designation/ demarcation as 'fauna exclusion zones' prior to project-related land disturbance Fauna spotter present during all project- related land disturbance in Spinifex Sandplain habitat Daily fauna removal from trenches during pipeline construction Fauna egress installed in open trenches during construction Pipelines in Spinifex Sandplain habitat to be buried or elevated ≥100 mm above the ground at least every 100 m 	 pipeline construction No loss of active Great Desert Skink burrows due to land disturbance for project-related 	 Great Desert Skink burrow location and status data collected during pre- disturbance surveys Fauna spotter to record observations of significant fauna and burrows during project-related land disturbance in Spinifex Sandplain habitat, including written records and photographs, where appropriate Records of engagement with the Ngaanyatjarra Council relating to participation in pre-disturbance survey work Daily trench inspections with records of fauna removal during pipeline trenching activities 	GIS records of pre-disturbance	NR	 Conditions relating to pipeline construction are not applicable at this stage as pipeline construction has not commenced during the reporting period. Preclearance surveys were undertaken to ensure proposed pipeline alignment and bore locations avoid active skink burrows. The pipeline will be buried, except for isolated valve and pigging stations to minimise disturbance of Sandplain Spinifex habitat to the greatest extent practicable. A GDS pre-clearance survey was conducted by Lathwida Environmental in April 2023. GDS habitat locations and GDS exclusion areas are defined in the LADP system and central spatial database, which is used to ensure that ground disturbance is designed to avoid impacts on GDS habitat. Following a further survey by Lathwida in August 2023 the habitat mapping was further refined but did not change materially from previous mapping. Additional habitat definition was conducted April 2024 to better define the habitat preferences of the GDS and maximise survey coverage. Further pre-clearance surveys will be conducted 2-3 months prior to proposed clearing dates in NBF to ensure GDS active burrow avoidance during construction. Records of all pre-clearance surveys are maintained in the BHP document management system. A Register of GDS burrow locations is maintained and new burrow locations are added as and when discovered. Spatial data is maintained in the BHP central spatial database, including 50 metre buffer zones around active burrows. These buffer areas have also been pegged in the field using environmental pegs (blue and white striped caps on fence droppers). No Spinifex Sandplain habitat was disturbed during the reporting period; however, spotters are utilised during all clearing work in the Northern Borefield (NBF) as a condition of the LADP. Spotters from the community were present during clearing works associated with the access track following the wind turbine generator alignment. Contractors are required to implement tr		

Management Objective: Minimise adverse impacts to significant fauna as a result of project-related increase in feral animal abundance							
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence		
 Install fencing around domestic waste facilities minimise access to waste Construct and rehabilitate project borrow pits and all other constructed landforms to minimise permanent or long-term water holding Develop, implement and update a Feral Animal Monitoring and Control Program within the Development Envelope for the operational phase in response to construction phase and ongoing monitoring results 	 Minimise feral fauna species access to attractants (e.g. water sources and uncovered waste) Minimise feral fauna species access to ponded water in constructed landforms, including borrow pits Reduced observations of feral fauna species in project attractant areas (landfill, WWTP, water storage ponds, accommodation village) 	Quarterly feral animal monitoring and recording at attractant locations, including: o presence/absence o species o status of fencing o status of attractants (water storage, waste management) Post-rehabilitation earthwork inspections Workplace inspections (WWTP, landfill, water storages) Opportunistic fauna observations	 Internal incident reports Annual MRF reports Feral fauna species monitoring and control program records Annual WMP Compliance Assessment Report 	С	 New landfill has full fauna exclusion perimeter fence installed and concrete aprons at swinging gates to prevent terrestrial fauna access. Fauna grid extends below ground level. The rock quarry has a groundwater accumulation sump that has been provide with a sloped egress point for larger animals (especially camels). Rock pitching on all inner slopes facilitates egress by smaller animals. The area is not suitable for fencing to prevent fauna access due to ongoing access requirements for sourcing hard rock from the quarry. Camera traps placed at this location have not seen a large increase in pest fauna species, as verified through the baseling assessment conducted Dec2023 – January 2024. The recycled water turkeys' nest has been provided with a sloped egress point for larger animals (especially camels). Rock pitching on all inner slopes facilitates egress by smaller animals. The area is not suitable for fencing to prevent fauna access due to ongoing access requirements for construction. Camera traps placed at this location have not seen a large increase in pest fauna species, as verified through the baseline assessment conducted Dec202 – January 2024. If anything, this location supports native species such as 		



Management Action	Management Target	Monitoring	Reporting	Compliance	Evidence
nanagement Action	widilagement larget	Worldonling	Keporting	Status	
					 migratory birds and small local bird species. Project borrow pits are currently in use for construction purposes and not y ready for rehabilitation.
					 Temporary construction turkeys nests adjacent to the aerodrome were fen and have been infilled and remediated following cessation of use.
					A pest fauna baseline assessment was conducted December 2023 to Janua 2024 in order to define the current pest fauna populations within the WM development envelope. The findings of the baseline assessment were ther used to develop a draft Pest Fauna Management Plan, which is currently w NgC for review. Wild dog (including dingo) interactions are logged in the B event management system. Where required management actions are sought to be implemented in consultation with the NgC. Feral animal management measures are included in induction material and a series of awareness sess regarding dingoes have been delivered to the workforce.
					 Implementation of feral fauna management during construction and operations are managed under an agreement between BHP and the NGC Camel Company.
					 Feral fauna access to attractants is minimised through the use of lidded wareceptacles, adoption of wild dog-resistant waste bins in the village and covering of interim waste skips with heavy netting.
					 Quarterly feral fauna audits are conducted assess the management of faur attractants, feral fauna sighting and interaction trends, and the delivery of fauna management interventions such as training and communication. Findings of the audits are maintained in the BHP document management system and actions raised in the BHP event management system as require
					 Pest and feral fauna observations and interactions are recorded in the BHP event management system to enable trend analysis and management measures to be implemented based on such trends.
					 Rehabilitation of borefield development sumps is ongoing as bores are completed. Some sumps are required to be maintained for future sump ter and will act as attractant following rainfall. These will be rehabilitated whe borefield construction is finalised.
					 Post rainfall inspections are conducted to identify accumulations of water to project activities, where required, these accumulations may be drained tested depending on potential contamination. Pre-rainfall inspections are conducted to ensure sufficient capacity in bunds etc prior to rainfall to pre overtopping.
					 Opportunistic fauna observations and fauna interactions are logged by all personnel in the BHP event management system.
					 Camera traps are routinely placed across WMP to monitor for pest and significant fauna. Locations are highly variable, and may occur anywhere the is access, or a potential attractant source, or where reports of feral fauna sightings have been recorded in the BHP event management system.
					The first MRF report was submitted to DEMIRS in July 2023
					• This document forms part of the second CAR that is due on 20 July 2024.



Management Objective: Minimise adverse impacts to significant fauna as a result of project-related altered fire regime								
Management Action	Management Target	Monitoring	Reportin q	Compliance Status	Evidence			
 Develop and maintain a Fire Mitigation Plan and incorporate into the Asset Emergency Management Plan Install and maintain fire extinguishers and firefighting equipment in the project area and on site to relevant Australian Standards Install and maintain firefighting equipment in machinery and vehicles undertaking land disturbance activities Project emergency response personnel trained in fire and bushfire response Vehicles kept to access tracks or cleared areas Develop and implement a Hot Work Permit system Fire management practices developed in consultation with WA Department of Fire and Emergency Services (DFES) and the Ngaanyatjarra Council, including installation and maintenance of firebreaks if required Site induction to include information on prevention, management and response to fires 	No unplanned fires attributable to project-related activities Minimise the potential environmental damage from project-related extreme or out-of-control wildfires attributed to project-related activities No unplanned fires attributed related environmental damage from project-related extreme or out-of-control wildfires attributed to project-related activities	Emergency response equipment inspections relative to relevant Australian Standards Annual fire response training exercise including wildlife response Annual review of fire break development for evidence of adequate installation and maintenance	Internal incident reports Internal project-related Land Disturbance Register and LDPs Hot Work Permit register Induction and training records Annual WMP Compliance Assessment Report	C	The Bushfire Management Plan (WM-0000-WHS-PLN-0009) was issued for use on 29/08/2022 and is currently under revision. Ouarterly fire appliance audits are conducted to ensure compliance with the commitments in this plan. Findings of the audits are maintained in the BHP document management system and actions raised in the BHP event management system, as required. All fire-fighting equipment is audited quarterly by the relevant contracting partner and by Mercury Fire for BHP-owned firefighting equipment. All vehicles and mobile plant are equipped with firefighting equipment that is checked daily as part of the pre-start inspection. All emergency response personnel are trained in fire and bushfire response. Training is conducted weekly. Site rules prohibit departure from defined access tracks during operations. Departure during Project development is conducted only as required and is monitored by inspections and LADP system reporting. A hot works permit system has been established and all hot works outside established workshop areas are recorded in the Hot Works Registers maintained by the various contracting partners and BHP Site Services. DFES are notified of any hot works intended to occur during a total fire ban as required, prior to the works commencing. Information on prevention and response to fires is contained in the site induction material. No fires with the potential to cause environmental harm were recorded within the reporting period. An ozone reacting with a carbon filter fire occurred at the WWTP that caused no environmental harm from bushfires are contained in the Bushfire Management Plan (WM-0000-WHS-PLN-0009), that aligns with relevant DFES standard operating procedures. A memorandum of understanding for Mutual Support in Planning and Responding to Emergency Incidents was concluded between DFES and OZ Minerals Musgrave Operations Pty Ltd on 22 August 2022. Firebreak has been established around the perimeter of the accommodation camp, fixed plant and work areas. All clearing is authoris			





A6. APPENDIX 6 - STATEMENT OF COMPLIANCE

Statement of Compliance

Proposal and Proponent Details

Proposal Title	The proposal is to develop two copper and nickel deposits (Babel pit and Nebo pit) within the West Musgrave Ranges of Western Australia.
Statement Number	MS 1188
Proponent Name	OZ Minerals Musgrave Operations Pty Ltd 640 213 341
Proponent's Australian Company Number (where relevant)	640 213 341

Statement of Compliance Details

Reporting Period	21/03/23 to 20/04/24
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Implementation phase(s) during reporting period (please tick ü relevant phase(s))							
Pre-construction		Construction	✓	Operation		Decommissioning	

Audit Table for Statement addressed in this Statement of	2
Compliance is provided at Attachment:	2

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) *Post Assessment Guideline for Preparing an Audit Table*, 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.

This Statement of Compliance is included as Appendix 6 of the CAR. Audit tables for MS 1188 and the required management plans are Appendices 1 to 5 of the CAR.

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)	✓	Yes (please proceed to Section 4)	

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

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

Non-compliance/potential non-compliance 0-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?
8-1
Was the implementation condition or procedure non-compliant or potentially non-compliant?
Non-compliant Non-compliant
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?
20/3/2024

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?			
▼ Yes	o Reported to DWER verbally ✓ Reported to DWER in writing	Date Date 01/07/2024	□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?

The CEO has not been notified of the change of the principal place of business address of the proponent (on 2/5/2023) following acquisition of OZ Minerals by BHP. There are no environmental impacts associated with the non-compliance.

What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)

No applicable

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

An oversight on the part of the proponent.

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?

The non-compliance was reported to the CEO separately to this CAR on 01 July 2024 and the updated address provided.

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?

The WMP will be implementing an electronic compliance management system to assist with the management of compliance to the conditions of approvals. Previously obligations were tracked manually in an Excel-based obligations register.

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

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)

- Notification of Change of Principal Place of Business Address was sent to DWER on 1 July 2024. An automated acknowledgement of receipt was received om the same day.
- Notification of non-compliances 3-1 to 3-4 was sent to DWER on 1 July 2024. An
 automated acknowledgement of receipt was received om the same day.

Non-compliance/potential non-compliance 0-2

Which implementation condition or procedure was non-compliant or potentially non-
compliant?
Terrestrial Fauna Management Plan
Was the implementation condition or procedure non-compliant or potentially non-
compliant?
Non-compliant Non-compliant
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?
20/3/2024

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?			
✓ Yes	o Reported to DWER verbally ✓ Reported to DWER in writing	Date Date 01/07/2024	□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?

Quarterly reviews of records of speed limit non-compliances were not undertaken as required by the monitoring actions specified for the Management Objective: *Minimise death or injury to significant fauna as a result of interactions with project-related vehicles or machinery.*

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)

No applicable

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

An oversight on the part of the proponent and review measures undertaken via alternative mechanisms

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?

The non-compliance was reported to the CEO separately to this CAR. The proponent will implement a quarterly reminder in the compliance management system to perform the review and include this activity as part of the quarterly fauna audit undertaken by the WMP site environmental team.

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?

The WMP will be implementing an electronic compliance management system to assist with the management of compliance to the conditions of approvals. Previously obligations were tracked manually in an Excel-based obligations register.

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

- 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)

Notification of non-compliances 3-1 to 3-4 was sent to DWER on 1 July 2024. An automated acknowledgement of receipt was received on the same day.

Non-compliance/	potential non-co	mpliance 0-3

Which implementation condition or procedure was non-compliant or potentially non-
compliant?
Groundwater Monitoring and Management Plan
Was the implementation condition or procedure non-compliant or potentially non-
compliant?
Potentially non-compliant
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?
Multiple

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?			
▼ Yes	o Reported to DWER verbally ✓ Reported to DWER in writing	Date Date 01/07/2024	□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?

Section 2.6.1: In the event that monitoring, tests, surveys or investigations indicate an exceedance of a threshold criteria, OZ Minerals will report in accordance with the requirements of the relevant Ministerial Statement Condition(s).

At BMB10-D, the measured Electric Conductivity (EC) was consistently observed (i.e. stable) above the defined trigger (and intermittently above the threshold value), indicating there is statistical limitations in the baseline range, given that no foreseeable causal effect situated near this bore is noted (due to limited Project related activities).

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)

BMB10-D, refer to attached map (attachment 1)

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

Statistical limitations in the baseline range, given that no foreseeable causal effect situated near this bore is noted (due to limited Project related activities).

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?

Nil, review GMMP to address cause and correct baseline for natural and temporal variability in EC

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?

Nil, review GMMP to address cause and correct baseline for natural and temporal variability in EC

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

- 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) Notification of non-compliances 3-1 to 3-4 was sent to DWER on 1 July 2024. An automated acknowledgement of receipt was received on the same day.

Non-compliance/potential non-compliance 0-4

Which implementation condition or procedure was non-compliant or potentially non-
compliant?
Groundwater Monitoring and Management Plan
Was the implementation condition or procedure non-compliant or potentially non-
compliant?
Non-compliant Non-compliant
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?
Multiple

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?			
✓ Yes	o Reported to DWER verbally ✓ Reported to DWER in writing	Date Date 01/07/2024	□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?

Section 2.6.4: All reporting discussed in this section will be made specifically available to the Ngaanyatjarra People through the Ngaanyatjarra Council, including where necessary periodic face-to-face meetings to discuss the results and outcomes of monitoring. The Ngaanyatjarra Council will be made aware of any trigger or threshold exceedances within 48 hours of OZ Minerals becoming aware of them.

The below findings were not reported to NgC within 48 hours of OZ Minerals (BHP) being aware of the exceedance.

At BMB10-D, the measured Electric Conductivity (EC) was consistently observed (i.e. stable) above the defined trigger (and intermittently above the threshold value), indicating there is statistical limitations in the baseline range, given that no foreseeable causal effect situated near this bore is noted (due to limited Project related activities).

Sulphate trigger value exceedances were recorded in four (4) locations across the mining area (MMB-01 and MMB-02) and Northern Borefield (BMB-05S and BMB10-S) although these exceedances are not inferred to be attributable to the Project, given the limited site activities and are likely a reflection of statistical limitations in the baseline range.

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)

BMB10-D, MMB-01 and MMB-02, refer to attached map (attachment 1)

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

Statistical limitations in the baseline range, given that no foreseeable causal effect situated near this bore is noted (due to limited Project related activities).

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?

Nil, review GMMP to address cause and correct baseline for natural and temporal variability in EC and sulphate.

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?

Nil, review GMMP to address cause and correct baseline for natural and temporal variability in EC and sulfate.

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

- 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)

Notification of non-compliances 3-1 to 3-4 was sent to DWER on 1 July 2024. An automated acknowledgement of receipt was received on the same day.

Non-compliance/potential non-compliance 0-5

Which implementation condition or procedure was non-compliant or potentially non-compliant?

Cultural Heritage Management Plan

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)? 27 March 2024

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?			
✓ Yes	o Reported to DWER verbally ✓ Reported to DWER in writing	Date Date 11/07/2024	□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?

The breach of the CHMP Golden Rules (#2) on 27 March 2024 involved the following: An excavator travelled along a non-nominated road within an exclusion zone and outside of the Mining Agreement in contravention with the requirements of the Mining Agreement. There was no environmental or heritage damage outside of the footprint of the well-formed road.

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)

Please refer to the attached map (Attachment 2) for an indication of the roads involved and the location of the non-compliance.

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

In terms of failed controls that led to the event, the track was signposted with 'no-access' signage at both ends; however, signage was missing from one end (star pickets still standing in place). Signage for these tracks is installed adjacent to the track (rather than hard barricading) to ensure continued community access to utilise the road(s).

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?

- Event reported to the CEO of the NgC.
- All regional ground disturbance works ceased until audit of signage completed.
- Audit of regional access control signage and rectification of identified deficiencies.
- Escalation process undertaken and full BHP ICAM investigation initiated. Initial findings were communicated to the NgC and the consideration of corrective actions is ongoing in consultation with the NgC.

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?

Roadside signage indicating the exclusion zone was previously put in place, but the relevant sign was missing. An audit of access control signage was conducted, and deficiencies corrected. Further preventive measures, including hard barricading are being investigated with the NgC.

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

- 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)

Notification of this non-compliance was sent to DWER on 11 July 2024. An automated acknowledgement of receipt was received on the same day.

Proponent Declaration

I, <u>Shoanne Labowitch, Manager: Environment and Secondary Approvals</u>, declare that I am authorised on behalf of <u>Thomas Lynch</u>, <u>Project Director – West Musgrave Project</u> (being the person responsible for the proposal) to submit this form and that the information contained in this form is true and not misleading.

Jordan	11-Jul-2024
Signature: Shoanne Labowitch (Jul 11, 2024 22:17 GMT+8)	
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.

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.

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

Post Assessment Guidelines and Forms

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

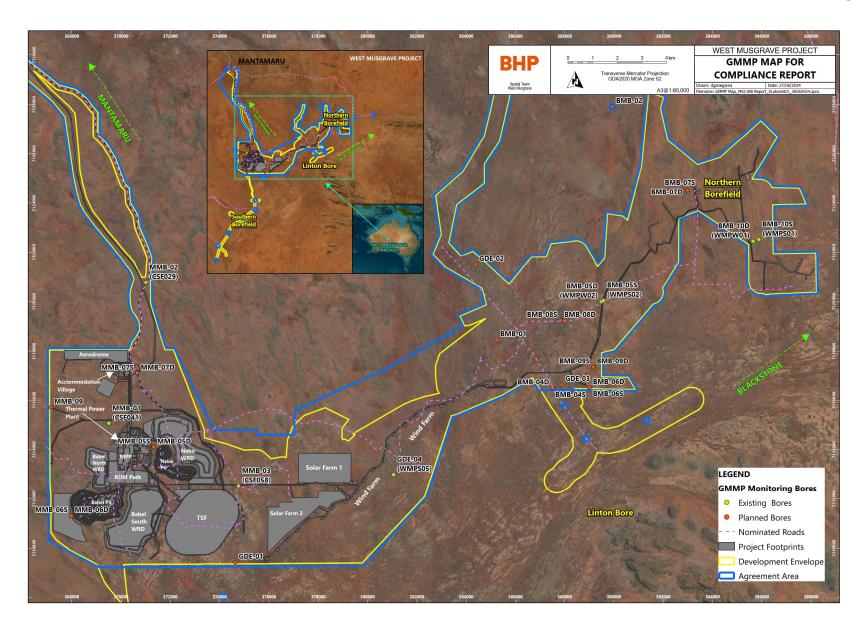
ATTACHMENT 1

Table 1 Compliance Status Terms

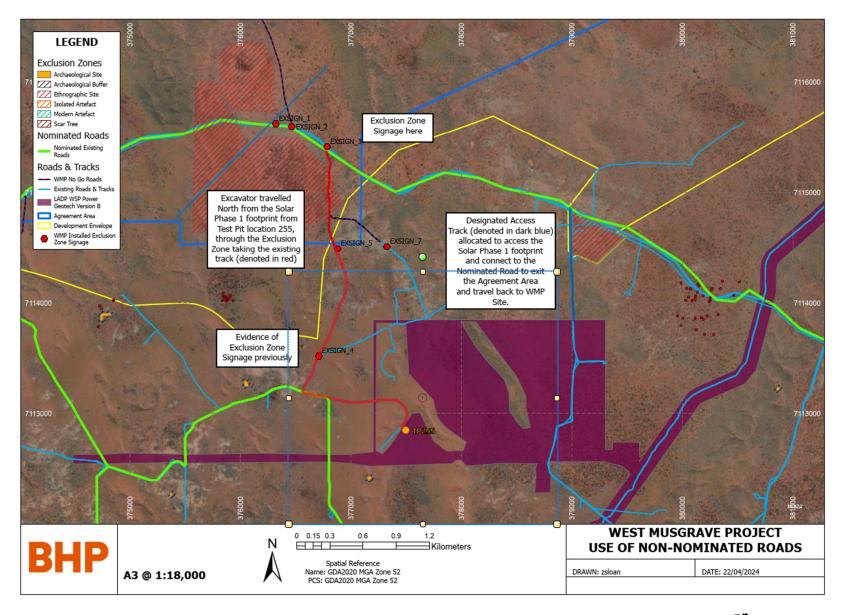
Compliance Status Terms	Abbrev	Definition	Notes
Compliant	С	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	 This term applies to audit elements with: ongoing requirements that have been met during the reporting period; and requirements with 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: 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 finalised 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	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).
		pending.	

ATTACHMENT 1



ATTACHMENT 2



BHP

WMP_CAR-MS1188_2024

Final Audit Report 2024-07-12

Created: 2024-07-11

By: Shoanne Labowitch (Shoanne.Labowitch@bhp.com)

Status: Signed

Transaction ID: CBJCHBCAABAA_82_BBceaesXQ8U1EUwgZlhqyFlksfUM

"WMP_CAR-MS1188_2024" History

Document created by Shoanne Labowitch (Shoanne.Labowitch@bhp.com)

2024-07-11 - 2:11:50 PM GMT- IP address: 163.116.211.47

Document emailed to thomas.lynch@bhp.com for signature

2024-07-11 - 2:16:47 PM GMT

Document emailed to Shoanne Labowitch (Shoanne.Labowitch@bhp.com) for signature

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Shoanne Labowitch (Shoanne.Labowitch@bhp.com) has agreed to the terms of use and to do business electronically with BHP BILLITON GROUP OPERATIONS PTY L

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2024-07-12 - 10:35:50 PM GMT- IP address: 130.41.62.171

Signer thomas.lynch@bhp.com entered name at signing as Thomas Lynch

2024-07-12 - 10:37:07 PM GMT- IP address: 163.116.215.31

Thomas Lynch (thomas.lynch@bhp.com) has agreed to the terms of use and to do business electronically with BHP BILLITON GROUP OPERATIONS PTY L

2024-07-12 - 10:37:09 PM GMT- IP address: 163.116.215.31

Document e-signed by Thomas Lynch (thomas.lynch@bhp.com)

Signature Date: 2024-07-12 - 10:37:09 PM GMT - Time Source: server- IP address: 163.116.215.31



Agreement completed. 2024-07-12 - 10:37:09 PM GMT