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Published on: 13 September 2022

Statement No. 1197

STATEMENT THAT A PROPOSAL MAY BE IMPLEMENTED
(Environmental Protection Act 1986)

SANJIV RIDGE PROJECT – STAGE 2

Proposal: The proposal will involve the above watertable mining of approximately 10 million tonnes of iron ore from the Glen Herring, Dazzler and Hero pits. The proposal will consist of three new pits, four waste rock dumps and a 4 kilometre haul road connecting it to Stage 1, where ore will be hauled for processing.

Proponent: Atlas Iron Pty Ltd
Australian Company Number 110 396 168

Proponent Address: Level 17, 300 Murray St, Perth WA 6000

Assessment Number: 2313

Report of the Environmental Protection Authority: 1726

Pursuant to section 45 of the *Environmental Protection Act 1986* (EP Act), it has been agreed that the proposal described and documented in Table ES-2 of the proponent's referral supporting document (revision 2) dated 25 November 2021 may be implemented and that the implementation of the proposal is subject to the following implementation conditions and procedures:

Related Assessment Number: 2218

Related Report of the Environmental Protection Authority: 1665

Related Statement to this proposal: 1125

1 Limitations and Extent of proposal

When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents:

| Proposal element | Location | Maximum extent or range |
|-----------------------------|-----------------|---|
| Physical elements | | |
| Development envelope | Figures 1 and 2 | No more than 246 ha |
| Indicative footprint | Figure 2 | No more than 125 ha within a 246 ha development envelope |
| Mine Exclusion Zone (MEZ) | Figure 3 | Exclusion of mining activities, pits, excavation, waste dumps and permanent structures. |
| Operational elements | | |
| Mining | Figure 2 | Up to 3 Mtpa. |
| Timing elements | | |
| Project life | N/A | Up to 4.5 years from date of substantial commencement. |

2 Terrestrial Fauna

2-1 The proponent shall implement the proposal to meet the following environmental outcomes:

- (1) clearing in the fauna habitat type identified as Ironstone Ridgetop shall not exceed 89.1 ha;
- (2) clearing in the fauna habitat type Rocky Ridge and Gorge shall not exceed 25 ha;
- (3) clearing in the fauna habitat type Stony Rises shall not exceed 5.8 ha;
- (4) clearing in the fauna habitat type Rocky Foothills shall not exceed 4.6 ha;
- (5) no adverse impact to the structural integrity, microclimate or viability of the ten (10) bat caves shown in Figure 4; and
- (6) no direct disturbance of bat cave avoidance buffers around ten (10) caves in the development envelope as depicted in Figure 4 and coordinates in Schedule 1;

2-2 The proponent shall implement the proposal to meet the following environmental objective:

- (1) avoid, where possible, and otherwise minimise indirect impacts to listed **conservation significant fauna** species within the development envelope.

2-3 The proponent shall implement the latest version of the Significant Species Management Plan which shall:

- (1) demonstrate how the environmental outcomes in condition 2-1 and the objective of condition 2-2 are achieved;
 - (2) include bat cave avoidance buffers around ten (10) caves in the development envelope as depicted in Figure 4 and coordinates in Schedule 1;
 - (3) include the latest version of the northern quoll monitoring procedure;
 - (4) include the latest version of the ghost bat monitoring procedure;
 - (5) design blasts to perform to the blast criteria at threshold 100 mm/s at caves CO-CA-22, CO-CA-24 and CO-CA-27 for the protection of the structural integrity of bat roosts;
 - (6) specify trigger criteria that will trigger the implementation of management and/or contingency actions to prevent direct or indirect impacts to **conservation significant fauna** species;
 - (7) specify threshold criteria to demonstrate compliance with conditions 2-1 and 2-2;
 - (8) specify monitoring methodology to determine if trigger criteria and threshold criteria have been met;
 - (9) specify management and/or contingency actions which include changes to operations to be implemented if the trigger criteria required by condition 2-3(6) and/or the threshold criteria 2-3(7) have not been met; and
 - (10) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that conditions 2-1 and 2-2 have been met over the reporting period in the Compliance Assessment Report required by condition 8-6.
- 2-4 The proponent must not commence **ground disturbing activities** until the **CEO** has confirmed in writing that the Significant Species Management Plan satisfies the requirements of condition 2-3.
- 2-5 The proponent shall implement the most recent version of the **confirmed** Significant Species Management Plan until the **CEO** has confirmed by notice in writing that the proponent has demonstrated that the environmental outcomes in condition 2-1 and objective detailed in condition 2-2 have been met.
- 2-6 In the event that the environmental outcomes in condition 2-1 are exceeded, or monitoring or investigations at any time indicate an exceedance of threshold criteria specified in the **confirmed** Significant Species Management Plan, the proponent shall:

- (1) report the exceedance in writing to the **CEO** and **DCCEEW** within seven (7) days of the exceedance being identified;
- (2) implement the management or contingency actions required by condition 2-3(9) within seven (7) days of the exceedances being reported as required by condition 2-6(1) and continue implementation of those actions until the **CEO** and **DCCEEW** have **confirmed** by notice in writing that it has been demonstrated that the threshold criteria are being met and implementation of the management and/or contingency actions are no longer required;
- (3) investigate to determine the cause of the threshold criteria being exceeded;
- (4) investigate to provide information for the **CEO** and **DCCEEW** to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded;
- (5) provide a further report to the **CEO** and **DCCEEW** within twenty-one (21) days of the exceedance being reported as required by condition 2-6(1) which shall include:
 - (a) details of management and/or contingency actions implemented;
 - (b) the effectiveness of the management and/or contingency actions implemented against the threshold criteria;
 - (c) the findings of the investigations required by conditions 2-6(3) and 2-6(4);
 - (d) measures to prevent the threshold criteria being exceeded in the future;
 - (e) measures to prevent, control or abate the environmental harm which may have occurred; and
 - (f) justification of the threshold criteria remaining, or being adjusted based on better understanding, demonstrating that outcomes will continue to be met.

2-7 Without limiting condition 2-5 (implementation of the plan) and notwithstanding compliance with condition 2-6 (response to exceedance), the proponent must not cause or allow:

- (1) a failure to implement one or more management and/or contingency actions, if the relevant threshold criteria have been exceeded;

- (2) the exceedance of a threshold criteria (regardless of whether the relevant management and/or contingency actions have been or are being implemented); and/or
- (3) a failure to comply with the requirements of the **confirmed** Significant Species Management Plan.

2-8 The proponent:

- (1) may review and revise the **confirmed** Significant Species Management Plan and submit it to the CEO; and
- (2) shall review and revise the **confirmed** Significant Species Management Plan and submit it to the CEO as and when directed by the CEO.

3 Inland Waters

3-1 The proponent shall implement the proposal to meet the following outcome:

- (1) avoid direct disturbance of the 50 m avoidance buffer around pools CO-WS-04, CO-WS-16, CO-WS-17 and CO-WS-18 as depicted in Figure 3 and coordinates in Schedule 1.

4 Cultural Heritage

4-1 The proponent shall implement the proposal to meet the following outcomes:

- (1) avoid direct disturbance of Aboriginal heritage avoidance buffers and their sites CRD-03-13B and CRD-71-20, located in the exclusion zones as shown in Figure 3 and coordinates in Schedule 1; and
- (2) subject to reasonable health and safety requirements, allow ongoing access to land utilised for traditional owner and custodian access within and surrounding the development envelope during operations.

4-2 The proponent shall implement the proposal to meet the following objectives:

- (1) avoid, where possible, and otherwise minimise indirect impacts to Aboriginal heritage sites CRD-03-13B and CRD-71-20, within and surrounding the disturbance footprint; and
- (2) avoid, where possible, and otherwise minimise direct and indirect impacts to **social and cultural places and activities of significance**.

4-3 Prior to the **ground disturbing activities**, or such lesser time approved in writing by the CEO, the proponent shall, in collaboration with the Njamal Aboriginal Corporation, prepare and submit to the **CEO** a Cultural Heritage Management Plan, to meet the outcomes specified in condition 4-1 and objectives specified in condition 4-2 and this plan shall:

- (1) specify the objectives to be achieved, as specified in condition 4-2;
- (2) include a framework for consultation with traditional owners and custodians via the Njamal Aboriginal Corporation and other relevant stakeholders during the life of the proposal;
- (3) include information on ongoing monitoring of permanent water sources including the creeklines that flow between the development envelope and Coongan river;
- (4) specify operational environmental management activities relevant to cultural heritage;
- (5) include information on the outcomes of a heritage survey over a 200 m wide area surrounding the development envelope;
- (6) specify management actions that will be implemented to demonstrate compliance with the objectives specified in condition 4-2;
- (7) specify target(s) to determine the effectiveness of the management actions;
- (8) specify monitoring to measure the effectiveness of management actions against management targets;
- (9) in the event that the outcomes, objectives, and management targets are not achieved, specify a process of review and revision of management actions and changes to activities. Such process must include an investigation to determine the cause of the outcome, objective or management target(s) not being met;
- (10) report on compliance with the outcomes specified in condition 4-1 and objectives specified in condition 4-2; and
- (11) provide the format and timing to demonstrate that conditions 4-1, 4-2, and 4-3 have been met for the reporting period in the Compliance Assessment Report required by condition 8-6 including, but not limited to:
 - (a) verification of the implementation of management actions; and
 - (b) reporting on the effectiveness of management actions against the outcomes and objectives.

4-4 The proponent must not commence **ground disturbing activities** until the **CEO** confirmed in writing that the plan submitted under condition 4-3 satisfies the requirements of condition 4-3.

4-5 The proponent must implement the most recent version of the **confirmed** Cultural Heritage Management Plan until the **CEO** has confirmed by notice in writing that the proponent has demonstrated the outcomes specified in condition

4-1 and objectives specified in condition 4-2 have been met or are able to be met under another statutory decision making process.

4-6 In the event that monitoring, tests, surveys or investigations indicate non-achievement of outcomes specified in condition 4-1 or the objectives specified in condition 4-2, the proponent must:

- (1) report the non-achievement in writing to the **CEO**, and the Njamal Aboriginal Corporation, within twenty-one (21) days of the non-achievement being identified;
- (2) investigate to determine the cause of outcome or management target(s) not being achieved;
- (3) provide a further report to the **CEO**, Njamal Aboriginal Corporation, within ninety (90) days of the non-achievement being reported as required by condition 4-7(1) which must include:
 - (a) a description of the cause of outcome or management target(s) being exceeded if known, or analysis of likely causes if not known;
 - (b) the findings of the investigation required by condition 4-6(2);
 - (c) details of revised and/or additional management actions to be implemented to prevent non-achievement; and
 - (d) relevant changes to activities.

4-7 In the event that monitoring, tests, surveys or investigations indicate that one or more management action(s) specified in the **confirmed** Cultural Heritage Management Plan have not been implemented, the proponent must:

- (1) report the failure to implement the management action(s) in writing to the **CEO**, Njamal Aboriginal Corporation, within seven (7) days of identification;
- (2) investigate to determine the cause of the management action(s) not being implemented;
- (3) investigate to determine potential environmental harm or alteration of the environment that occurred due to the failure to implement management action(s);
- (4) provide a further report to the **CEO**, Njamal Aboriginal Corporation, within twenty-eight (28) days of the non-compliance being identified, which must include:
 - (a) cause for failure to implement management action(s);
 - (b) the findings of the investigation required by condition 4-7(2);

- (c) relevant changes to activities; and
 - (d) measures to prevent, control or abate the environmental harm which may have occurred.
- 4-8 Without limiting condition 4-5 (implementation of the plan) and notwithstanding compliance with condition 4-6 (response to exceedance), the proponent must not cause or allow:
 - (1) a failure to implement one or more management actions specified in the **confirmed** Cultural Heritage Management Plan, and/or
 - (2) failure to comply with the requirements of the **confirmed** Cultural Heritage Management Plan.
- 4-9 The proponent, in consultation with the Njamal Aboriginal Corporation:
 - (1) may review and revise the **confirmed** Cultural Heritage Management Plan and submit it to the **CEO**; and
 - (2) shall review and revise the **confirmed** Cultural Heritage Management Plan as and when directed by the **CEO**.

5 Offsets

- 5-1 The proponent shall contribute funds to the **Pilbara Environmental Offsets Fund** calculated pursuant to condition 5-2, to counterbalance the significant residual impacts to:
 - (1) 'Excellent' condition native vegetation; and
 - (2) critical habitat for the northern quoll, ghost bat, Pilbara leaf-nosed bat, and Pilbara olive python.
- 5-2 The proponent's provisional contribution to the **Pilbara Environmental Offsets Fund** shall be paid after the conclusion of the biennial reporting period specified in conditions 5-5, with the provisional amount to be contributed, calculated based on the **clearing** undertaken during the biennial reporting period in accordance with the highest applicable rate specified in condition 5-3 for the relevant type of vegetation.
- 5-3 Calculated on the 2020–2021 financial year, the contribution rates are:
 - (1) \$794 AUD (excluding GST) per hectare of 'Good to Excellent' condition native vegetation within the Chichester IBRA subregion; and
 - (2) \$1,587 AUD (excluding GST) per hectare of critical habitat, northern quoll, ghost bat, Pilbara leaf-nosed bat and Pilbara olive python within the Chichester IBRA subregion.

- 5-4 The rates in condition 5-3 change annually each subsequent financial year in accordance with the percentage change in the **CPI** applicable to that financial year.
- 5-5 The proponent must prepare and submit a Sanjiv Ridge Stage 2 Project Impact Reconciliation Procedure to the **CEO** prior to **ground disturbing activities** which must:
- (1) spatially define the environmental value(s) identified in condition 5-1;
 - (2) spatially define the areas in respect of which offsets required by condition 5-1 are to be calculated;
 - (3) include a methodology to calculate the amount of clearing undertaken during each year of the biennial reporting period for each of the environmental values identified in condition 5-3;
 - (4) state that clearing calculation for the first biennial reporting period will commence from **ground disturbing activities** in accordance with condition 5-2 and end on the second 30 June following the commencement of **ground disturbing activities**;
 - (5) state that clearing calculations for each subsequent biennial reporting period will commence on 1 July of the required reporting period, unless otherwise agreed by the **CEO**;
 - (6) indicate the timing and content of the Impact Reconciliation Reports; and
 - (7) be prepared in accordance with Instructions on how to prepare *Environmental Protection Act 1986 Part IV Impact Reconciliation Procedures and Impact Reconciliation Reports* (or any subsequent revisions).
- 5-6 The proponent must not commence **ground disturbing activities** until the **CEO** has confirmed by notice in writing that the Impact Reconciliation Procedure satisfies the requirements of condition 5-5.
- 5-7 The proponent:
- (1) may review and revise the **confirmed** Impact Reconciliation Procedure;
or
 - (2) shall review and revise the **confirmed** Impact Reconciliation Procedure as and when directed by the **CEO** by a notice in writing.
- 5-8 The proponent shall submit Impact Reconciliation Reports in accordance with the **confirmed** Impact Reconciliation Procedure.

5-9 Despite payment of the provisional contribution, the proponent's liability to make a contribution under this condition shall be finally determined:

- (1) by the Minister upon application by the proponent in writing to the Minister to reduce in part or whole the proponent's liability under this condition where:
 - (a) a payment has been made to satisfy a condition of an approval under the *Environment Protection and Biodiversity Conservation Act 1999* in relation to the proposal; and/or
 - (b) the payment is made for the purpose of counterbalancing impacts of the proposal on matters of national environmental significance identified in condition 5-1; or
- (2) to be equivalent to the provisional contribution if no application of the kind described in condition 5-9(1) is made within twelve (12) months of the conclusion of the relevant biennial reporting period.

6 Contact Details

6-1 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.

7 Time Limit for Proposal Implementation

7-1 The proponent shall not commence implementation of the proposal after five (5) years from the date of this Statement, and any commencement, prior to this date, must be substantial.

7-2 Any commencement of implementation of the proposal, on or before five (5) years from the date of this Statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of five (5) years from the date of this Statement.

8 Compliance Reporting

8-1 The proponent shall prepare and maintain a Compliance Assessment Plan which is submitted to the **CEO** at least six (6) months prior to the first Compliance Assessment Report required by condition 8-6, or prior to **ground disturbing activities**, whichever is sooner.

8-2 The Compliance Assessment Plan shall indicate:

- (1) the frequency of compliance reporting;
 - (2) the approach and timing of compliance assessments;
 - (3) the retention of compliance assessments;
 - (4) the method of reporting of potential non-compliances and corrective actions taken;
 - (5) the table of contents of Compliance Assessment Reports; and
 - (6) public availability of Compliance Assessment Reports.
- 8-3 After receiving notice in writing from the **CEO** that the Compliance Assessment Plan satisfies the requirements of condition 8-2, the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 8-1.
- 8-4 The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 8-1 and shall make those reports available when requested by the **CEO**.
- 8-5 The proponent shall advise the **CEO** of any potential non-compliance within seven (7) days of that non-compliance being known.
- 8-6 The proponent shall submit to the **CEO** the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the **CEO**.

The Compliance Assessment Report shall:

- (1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf;
- (2) include a statement as to whether the proponent has complied with the conditions;
- (3) identify all potential non-compliances and describe corrective and preventative actions taken;
- (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and
- (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 8-1.

9 Public Availability of Data

9-1 Subject to condition 9-2, within a reasonable time period approved by the **CEO** of the issue of this Statement and for the remainder of the life of the proposal, the proponent shall make publicly available, in a manner approved by the **CEO**, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.

9-2 If any data referred to in condition 9-1 contains particulars of:

- (1) a secret formula or process; or
- (2) confidential commercially sensitive information, or
- (3) sensitive Aboriginal cultural knowledge;

the proponent may submit a request for approval from the **CEO** to not make these data publicly available. In making such a request the proponent shall provide the **CEO** with an explanation and reasons why the data should not be made publicly available.

[signed on 12 September 2022]

Hon Reece Whitby MLA

MINISTER FOR ENVIRONMENT; CLIMATE ACTION

| |
|---|
| Key decision-making authorities consulted under section 45(2): |
|---|

| |
|----------------------------------|
| Minister for Aboriginal Affairs |
| Minister for Mines and Petroleum |

Table 1: Abbreviations and definitions

| Acronym or abbreviation | Definition or term |
|--|---|
| CEO | The Chief Executive Officer of the Department of the Public Service of the State responsible for the administration of section 48 of the <i>Environmental Protection Act 1986</i> , or the CEO's delegate. |
| Clearing | Has the same meaning as in section 51A of the EP Act. |
| Conservation significant fauna | Threatened fauna species listed under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> and or the <i>Biodiversity Conservation Act 2016</i> . |
| Confirmed | Means, at the relevant time, in relation to a plan required to be made and submitted to the CEO, the plan that the CEO confirmed, by notice in writing, meets the requirements of the relevant condition. |
| CPI | The All Groups Consumer Price Index numbers for Perth compiled and published by the Australian Bureau of Statistics. |
| DCCEEW | Department of Climate Change, Energy, the Environment and Water |
| EP Act | <i>Environmental Protection Act 1986</i> |
| Ground disturbing activities | Any ground disturbing activity undertaken in the implementation of the proposal, including any clearing, civil works or construction, other than preliminary works to which approval has been given under the EP Act. |
| ha | Hectares |
| m | Metres |
| Mining Activities | Excavation of pits and construction of waste rock dumps |
| Mine Exclusion Zone | The Mine Exclusion Zone (MEZ) as delineated in Figure 3. Exclusion of mining activities, pits, excavation, waste dumps and permanent structures. |
| mm/s | Millimetres per second |
| Mtpa | Million tonnes per annum |
| IBRA | Interim Biogeographic Regionalisation for Australia |
| Pilbara Environmental Offsets Fund | A special purpose account that has been created pursuant to section 16(1)(d) of the <i>Financial Management Act 2006</i> by the Department of Water and Environmental Regulation. |
| Social and cultural places and activities of significance | Places and activities that are important to the Aboriginal people of the State, and are recognised through social, spiritual, historical, scientific or aesthetic values, as part of Aboriginal tradition, including the Coongan River. |

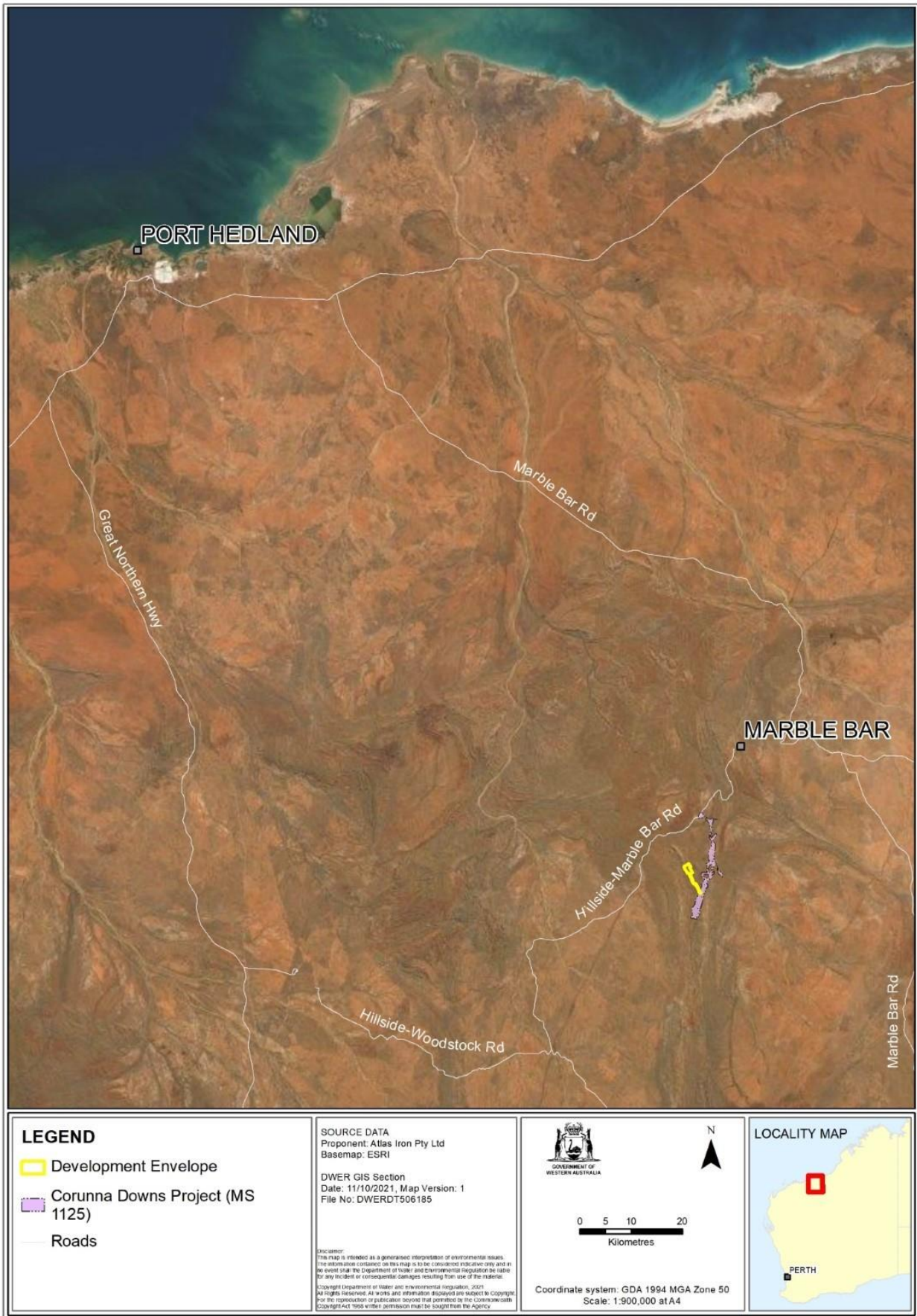
Figures (attached)

Figure 1: Project location and the development envelope

Figure 2: Development envelope and indicative footprint

Figure 3: Mine Exclusion Zone, Cultural Heritage buffers and water feature buffers within the development envelope

Figure 4: Bat cave avoidance buffers within the development envelope



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Unique Record ID

Figure 1: Project location and development envelope



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Figure 2: Development envelope and indicative footprint

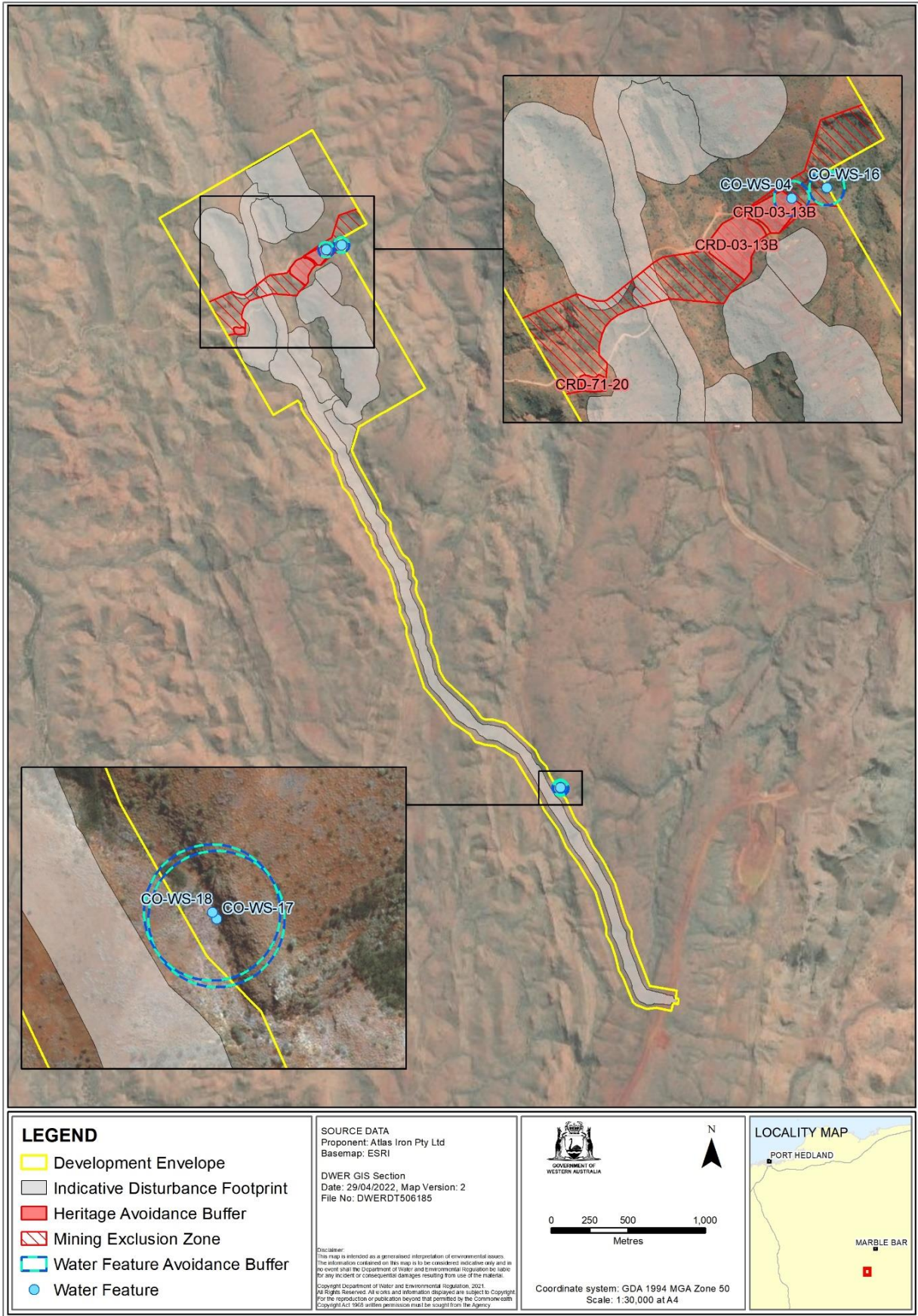


Figure 3: Mine Exclusion Zone, Cultural Heritage buffers and water feature buffers within the development envelope

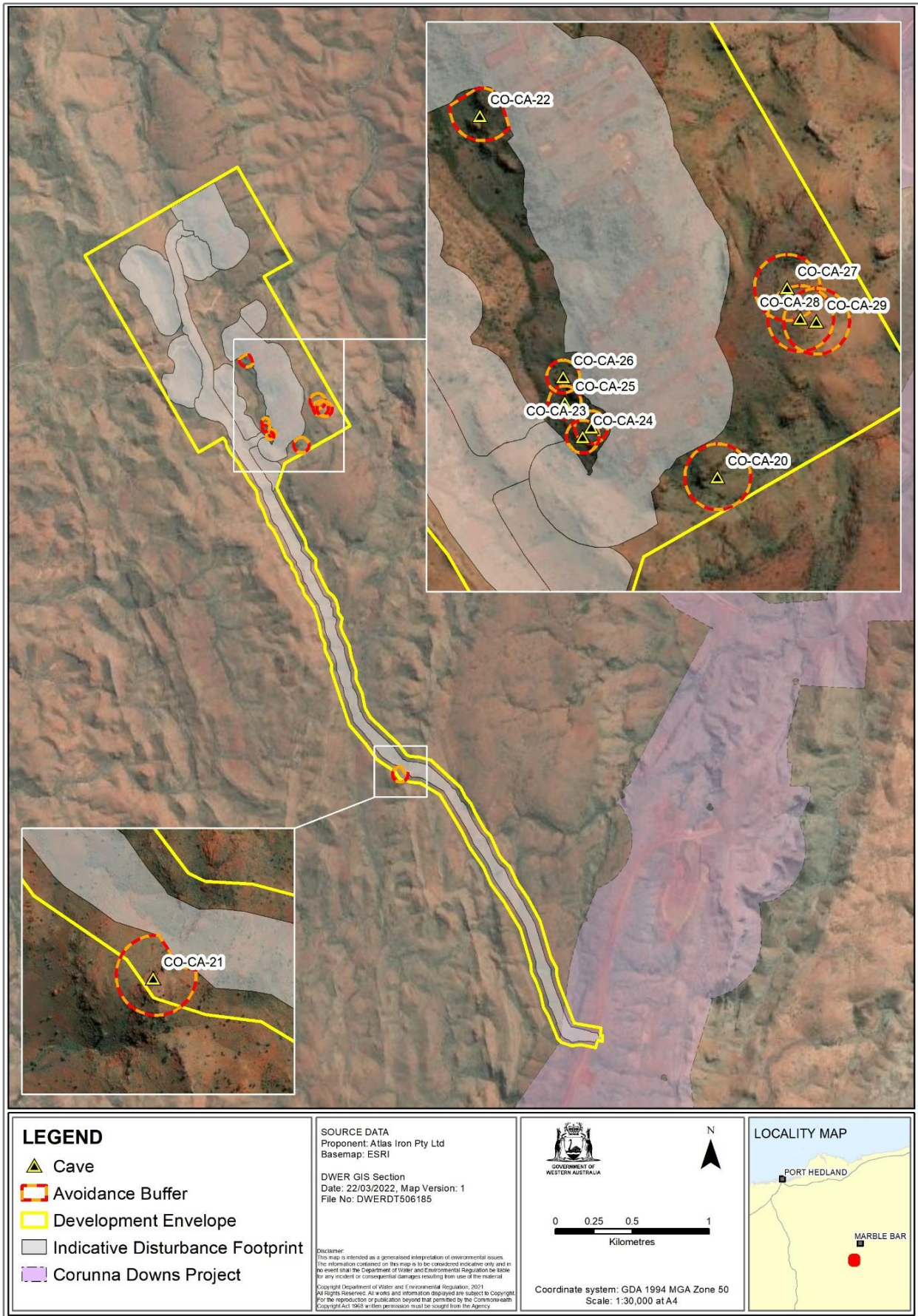


Figure 4: Bat cave avoidance buffers within development envelope

Schedule 1

All coordinates are in metres, listed in Map Grid of Australia Zone 51 (MGA Zone 51), datum of Geocentric Datum of Australia 1994 (GDA94).

Coordinates defining the development envelope shown in Figure 2 are held by the Department of Water and Environmental Regulation, Document Reference Number DWERDT506162.

Coordinates defining the Mine Exclusion Zone, Cultural Heritage buffers and the water feature buffers shown in Figure 3 are held by the Department of Water and Environmental Regulation, Document Reference Number DWERDT589618.

Coordinates defining the defining the bat cave buffers shown in Figure 4 are held by the Department of Water and Environmental Regulation, Document Reference Number DWERDT589613.

ATTACHMENT 1 TO STATEMENT 1197

NOTICE OF CHANGES TO IMPLEMENTATION CONDITIONS

(section 45C(5) of the *Environmental Protection Act 1986*)

SANJIV RIDGE PROJECT STAGE 2

Pursuant to section 45C(1)(b) of the *Environmental Protection Act 1986*, the implementation conditions applying to the above proposal are changed in accordance with this Notice. I consider these changes to be of a minor nature and desirable to amend implementation conditions relating to an approved proposal.

[Signed 29 September 2023]

PROFESSOR MATTHEW TONTS
CHAIR
ENVIRONMENTAL PROTECTION AUTHORITY

1. Condition 4-3 is deleted, and replaced with:

- 4-3 Prior to the ground disturbing activities, or such lesser time approved in writing by the CEO, the proponent shall, in consultation with the Njamal Aboriginal Corporation, prepare and submit to the CEO a Cultural Heritage Management Plan, to meet the outcomes specified in condition 4-1 and objectives specified in condition 4-2 and this plan shall:
- (1) specify the objectives to be achieved, as specified in condition 4-2;
 - (2) include a framework for consultation with traditional owners and custodians via the Njamal Aboriginal Corporation and other relevant stakeholders during the life of the proposal;
 - (3) include information on ongoing monitoring of permanent water sources including the creeklines that flow between the development envelope and Coongan river;
 - (4) specify operational environmental management activities relevant to cultural heritage;
 - (5) include information on the outcomes of a heritage survey over a 200 m wide area surrounding the development envelope;

- (6) specify management actions that will be implemented to demonstrate compliance with the objectives specified in condition 4-2;
- (7) specify target(s) to determine the effectiveness of the management actions;
- (8) specify monitoring to measure the effectiveness of management actions against management targets;
- (9) in the event that the outcomes, objectives, and management targets are not achieved, specify a process of review and revision of management actions and changes to activities. Such process must include an investigation to determine the cause of the outcome, objective or management target(s) not being met;
- (10) report on compliance with the outcomes specified in condition 4-1 and objectives specified in condition 4-2; and
- (11) provide the format and timing to demonstrate that conditions 4-1, 4-2, and 4-3 have been met for the reporting period in the Compliance Assessment Report required by condition 8-6 including, but not limited to:
 - (a) verification of the implementation of management actions; and
 - (b) reporting on the effectiveness of management actions against the outcomes and objectives.