



KEYSBROOK MINERAL SANDS MINE COMPLIANCE ASSESSMENT REPORT

OCTOBER 2021

**KEYSBROOK LEUCOXENE
PTY LTD**

*A 100% owned subsidiary of
DORAL MINERAL SANDS PTY LTD*

ABN: 49 137 091 297

**1424 Hopeland Road
NORTH DANDALUP WA 6207**

Phone: (08) 6557 5340

Fax: (08) 9328 9911

admin@klpl.com.au

www.doral.com.au

Rev	Date	Description	By	Approved
A	14/10/21	Draft for review	DO	CB
0	19/10/21	Final	DO	CB

Table of Contents

1.0	Introduction	3
2.0	Proposal Implementation Status	3
3.0	Compliance with Ministerial Statement 810	4
4.0	Non - Compliance and Corrective Actions	4

Appendices

Appendix 1	Statement of Compliance (incorporating Ministerial Statement 810 Audit Table)
Appendix 2	Assessment of Compliance against Schedule 1 of MS810
Appendix 3	Summary Audit Table: Implementation of Management Plans Required Under MS810
Appendix 4	Supporting Information: Keysbrook Mineral Sands Mine Ground Disturbance Summary February 2015 – July 2021
Appendix 5	Supporting Information: Keysbrook Mineral Sands Mine Overview of Declared Weed Control 2017 - 2021
Appendix 6	Supporting Information: Keysbrook Mineral Sands Project Annual Groundwater Monitoring Summary 2020 Groundwater Resource Management, March 2021
Appendix 7	Supporting Information: Keysbrook Mineral Sands Mine Rehabilitation Management Plan Implementation – Select Photographic Evidence
Appendix 8	Supporting Information: Keysbrook Mineral Sands Mine Annual Environmental Noise Compliance Report 2021
Appendix 9	Supporting Information: Keysbrook Mineral Sands Mine Wetland Vegetation monitoring Spring 2020, May 2021
Appendix 10	Supporting Information: Keysbrook Mineral Sands Mine Audit Closure Letter, September 2021

1.0 INTRODUCTION

The Keysbrook Mineral Sands Mine is 70 kilometres south of Perth, on the eastern edge of the Swan Coastal Plain. The mine is in the Shires of Murray and Serpentine-Jarrahdale, near the townships of Keysbrook and North Dandalup. The mine and primary processing plant are operated by Keysbrook Leucoxene Pty Ltd.

The project was assessed by the Environmental Protection Authority (EPA) through a Public Environmental Review and approved by the Minister for the Environment on 19 October 2009 in Ministerial Statement 810 (MS 810). An amendment to Condition 3 and Condition 16 of MS810 was approved through Ministerial Statement 984 (MS 984) on 16 October 2014. Condition 14 was amended on 8 February 2019 through Ministerial Statement 1089.

In August 2019, a Section 45C request was submitted to the EPA for inclusion of Lots 101, 103, 104 and 105 Westcott Rd, Keysbrook into the approved mine area. The inclusion of the four properties constitute an additional 12 months of mine life and provide access to the approved northern mining areas. In October 2019 the EPA approved the application for the inclusion of Lots 101, 103, 104 and 105 Westcott Rd, Keysbrook.

Condition 4-6 of MS810 requires the submission of a Compliance Assessment Report (CAR) prepared in accordance with a Compliance Assessment Plan. This report is the eleventh CAR for the proposal and addresses the period 20 July 2020 to 19 July 2021 (reporting period).

2.0 PROPOSAL IMPLEMENTATION STATUS

Construction of the project commenced in January 2015, and heavy mineral concentrate production commenced in November 2015. The project remained in the operational phase for the duration of the reporting period.

Key activities/developments in the reporting period included:

- Pasture rehabilitation works were completed on 594 hectares, with year 2 rehabilitation works completed on 318ha of pasture. This was a significant increase on the 50 hectares completed in the 2019 season and reflected in part to increased availability of post-mining land following improved tails management.
- A native vegetation rehabilitation program, based on a combination of seeding and 30,000 tube stock seedlings, commenced across 16ha of previously grazed land. Significant site preparation occurred prior to seeding with a series of weed control exercises and standard agricultural discing and ploughing to reduce weed pressure post seeding. The rehabilitation program focused on two discreet areas, with both areas fully fenced with Kangaroo proof fencing, totalling 4.5km.
- During the reporting period DWER undertook an audit of Ministerial Statement 810 to gauge the sites compliance with the ministerial statement conditions. The audit found that the site was compliant with the implementation conditions of Ministerial Statement 810.
- Noise monitoring of major earthmoving equipment onsite to educate noise modelling or compliance and potential future approval applications.
- Completion of a comprehensive environmental monitoring programme.
- Completion of an annual review of groundwater, with no material impact on local groundwater levels or quality identified since the commencement of the proposal.
- Ongoing implementation of a stakeholder engagement programme.

3.0 COMPLIANCE WITH MINISTERIAL STATEMENT 810

Compliance information is provided in the following appendices:

Appendix 1 – Statement of Compliance, incorporating status of compliance with Ministerial Statement 810 in an audit table (Attachment 2)

Appendix 2 - Assessment of compliance against Schedule 1 of MS810.

Appendix 3 – Summary Audit Table: Implementation of Management Plans required under MS810.

Appendix 4 – Supporting Information: Keysbrook Mineral Sands Mine Ground Disturbance Summary February 2015 – July 2021

Appendix 5 – Supporting Information: Keysbrook Mineral Sands Mine Overview of Declared Weed Control 2017 - 2021;

Appendix 6 - Supporting Information: Keysbrook Mineral Sands Project Annual Groundwater Monitoring Summary 2020 (Groundwater Resource Management, March 2021)

Appendix 7 - Supporting Information: Keysbrook Mineral Sands Mine Rehabilitation Management Plan Implementation – Select Photographic Evidence.

Appendix 8 - Supporting Information: Keysbrook Mineral Sands Mine Annual Environmental Noise Compliance Report 2021

Appendix 9 – Supporting Information: Keysbrook Mineral Sands Mine Wetland Vegetation Monitoring Spring 2020, May 2021

4.0 NON - COMPLIANCE AND CORRECTIVE ACTIONS

No material non-compliances with the requirements of Ministerial Statement 810 were identified for the reporting period. Implementation of the proposal has not compromised the environmental objectives of MS810 or of the underlying management plans. Review of the management plans is ongoing to ensure relevance and practicability.

One non-material incidents occurred during the reporting period, with the incident being reported to DWER.

- The one non-material incident, which occurred on 5 February 2020, was a voluntary report to the DWER compliance branch regarding three separate exceedances of the Dust Monitoring PM10 24-hour average trigger value. The three exceedances were not in themselves a breach of the sites Ministerial Statement (MS810) nor were they considered material incidents, rather the voluntary notification was made as a pre-emptive self-reporting approach in the event the site did breach sites ministerial statement 810, in particular condition 15-2 which states:
 - *ensure dust emissions from activities undertaken in implementing the proposal do not cause ambient dust concentration levels outside the boundary of the proposal area that are higher than 50 ug/m3 of Particulate Matter smaller than 10 microns as a 24 hour average, in excess of **five** times per year.*

The exceedances were considered unusual and weather station data indicated the exceedances were potentially a result of unusually strong and sustained easterly winds.

Furthermore and in accordance with the Dust Management Plan, dust lift off was proactively managed through the following measures:

- Planting dust crops during winter and spring – this process involves planting oats into areas that are not fully rehabilitated and is effective in reducing dust lift;
- Suspending mining during high winds – To date, during the reporting period, we have suspended mining (daytime) for a total of 19 hours to reduce further potential dust lift off;
- Commencing mining operations later in the morning once the easterly winds have eased;
- Ceasing afternoon mining operations in strong south westerly winds;
- Running extra water carts during high winds and also after hours in the anticipation of high winds;
- Increasing the fleet of water carts from 2 to 3 for extra application of water and clay fines;
- Running water/clay fines carts overnight 6pm to 6am when strong winds are forecast;
- Application of clay fines as a dust suppressant – Clay fines are a by-product of our processing operations. The application of clay fines via a water cart to provide a 'crust' on the soils surface to reduce dust lift off. To date this has worked with great effect however given the strength and persistence of the recent winds, it has required regular reapplication to open areas.

Appendix 1

Statement of Compliance (incorporating Ministerial Statement 810 Audit Table)

Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	Keysbrook Mineral Sands Mine
Statement Number	810; 984; 1089
Proponent Name	Keysbrook Leucoxene Pty Ltd
Proponent's Australian Company Number (where relevant)	137 091 297


2. Statement of Compliance Details

Reporting Period	20/07/20 to 19/07/21
------------------	----------------------

Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input type="checkbox"/>	Construction	<input type="checkbox"/>	Operation	<input checked="" type="checkbox"/>	Decommissioning	<input type="checkbox"/>

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

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

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

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

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

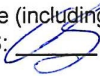
Non-compliance/potential non-compliance 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?
Was the implementation condition or procedure non-compliant or potentially non-compliant?
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?
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)
What was the cause(s) of the non-compliance or potential non-compliance?
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?
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?
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: <ul style="list-style-type: none"> • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. (the above information may be provided as an attachment to this Statement of Compliance)

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

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

4. Proponent Declaration

I, Craig Bovell OHSE Superintendent declare that I am authorised on behalf of Andrew Templeman General Manager (*being the person responsible for the proposal*) to submit this form and that the information contained in this form is true and not misleading.

Signature:.....

Date:.....18/10/20.....

Please note that:

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

5. Submission of Statement of Compliance

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

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

6. Contact Information

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

Manager, Compliance (Ministerial Statements)

Department of Water and Environmental Regulation


Postal Address: Locked Bag 10
EAST PERTH WA 6892

Phone: (08) 6364 700

Email: compliance@dwer.wa.gov.au


7. Post Assessment Guidelines and Forms

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

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

ATTACHMENT 1**Table 1 Compliance Status Terms**

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

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

APPENDIX 1: ATTACHMENT 2 - AUDIT TABLE

Keysbrook Mineral Sands Mine, Ministerial Statements, 810, 984 & 1089
Keysbrook Leucoxene Pty Ltd
Shire of Serpentine-Jarrahdale and Shire of Murray

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

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Phase	Timeframe	Status	Further Information
810:G									
810:M1.1	Proposal Implementation	The proponent shall implement the proposal as documented and described in schedule 1 of this statement subject to the conditions and procedures of this statement.	Project implemented in compliance with these criteria.	Compliance Assessment Report (CAR).	Min for Env	Overall	Ongoing	C	Compliance with Schedule 1 of MS810 compliance addressed at Appendix 2 of 2021 CAR.
810:M2.1	Proponent Nomination and Contact Details	The proponent for the time being nominated by the Minister under sections 38(6) or 38(7) of the Act is responsible for the implementation of the proposal.			Min for Env	Overall	Ongoing	C	
810:M2.2	Proponent Nomination and Contact Details	The proponent shall notify the CEO of any change of the name and address of the proponent for the serving of a notice or other correspondence within 30 days of such change.	Letter notifying CEO of any change in proponent details.	Proponent details correct. Letter notifying CEO of any change in proponent details.	CEO	Overall	Ongoing	C	Proponent changed from MZI Resources to Keysbrook Leucoxene Pty Ltd. Notice of change of proponent revoking MZI Resources as person responsible approved by EPA on 3 rd September 2019
810:M3.1	Time Limit of Authorisation	The authorisation to implement the proposal provided for in this statement shall lapse and be void within five years after the date of this statement if the proposal to which this statement relates is not substantially commenced.	Proposal commenced before 19 October 2014.	Detailed engineering undertaken. Approvals obtained. Photographs and/or production data proving commencement of on-ground works.	Min for Env	Overall	On or before 19 October 2014	CLD	Approval was granted for an extension of timeframe for substantial commencement before 19 October 2019 (Assessment No. 2020: EPA Report No. 1528). Approval through MS984, 26 October 2014. Condition is superseded with MS984 Condition 3.1.
984:M3.1	Time Limit for Proposal Implementation	The proponent shall not commence implementation of the proposal after 19 October 2019, and any commencement, prior to this date, must be substantial.	Proposal commenced before 19 October 2019.	Detailed engineering undertaken. Approvals obtained. Photographs and/or production data proving commencement of on-ground works.	CEO	Overall	On or before 19 October 2019	CLD	Proposal commenced in February 2015 (construction). Notice of substantial commencement with evidence provided to the EPA on the 23 June 2015.
810:M3.2	Time Limit of Authorisation	The proponent shall provide the CEO with written evidence which demonstrates that the proposal has substantially commenced on or before the expiration of five years from the date of this statement.	Letter, together with evidence, notifying CEO that the project has substantially commenced.	Letter notifying CEO that the project has substantially commenced.	CEO	Overall	On or before 19 October 2014	CLD	See 810:M3.1. Condition is superseded with MS984 Condition 3.2.
984:M3.2	Time Limit of Authorisation	The proponent shall provide the CEO with written evidence which demonstrates that the proposal has substantially commenced on or before the expiration of five years from the date of this statement.	Letter, together with evidence, notifying CEO that the project has substantially commenced.	Letter notifying CEO that the project has substantially commenced.	CEO	Overall	On or before 19 October 2019	CLD	Proposal commenced in February 2015. Notice of substantial commencement with evidence provided to the EPA on the 23 June 2015.

APPENDIX 1: ATTACHMENT 2 - AUDIT TABLE

Keysbrook Mineral Sands Mine, Ministerial Statements, 810, 984 & 1089
 Keysbrook Leucoxene Pty Ltd
 Shire of Serpentine-Jarrahdale and Shire of Murray

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Phase	Timeframe	Status	Further Information
810:M4.1	Compliance Reporting	The proponent shall prepare and maintain a compliance assessment plan to the requirements of the CEO.	Prepare a compliance assessment plan and review annually.	Compliance Assessment Plan (CAP). Approval of CAP by CEO.	CEO	Overall	Ongoing	CLD	Letter of approval from CEO of CAP gained on 08 September 2010 and of Audit Program by EPA.
810:M4.2	Compliance Reporting	The proponent shall submit to the CEO the compliance assessment plan required by condition 4-1, at least six months prior to the first compliance report required by condition 4-6, and prior to ground-disturbing activity, whichever is sooner.	The compliance assessment plan shall indicate: a. the frequency of compliance reporting; b. the approach and timing of compliance assessments; c. the retention of compliance assessments; d. reporting of potential non-compliances and corrective actions taken; e. the table of contents of compliance reports; and f. public availability of compliance reports.	CAP	CEO	Pre-construction	On or before 31 May 2010	CLD	CAP submitted on 28 May 2010.
810:M4.3	Compliance Reporting	The proponent shall assess compliance with conditions in accordance with the compliance assessment plan required by condition 4-1.	Undertake compliance assessments as detailed in the Compliance Assessment Plan.	Compliance Assessment Report (CAR).	CEO	Overall	Ongoing (as per CAP)	C	CAR submitted 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020 and 2021.
810:M4.4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the compliance assessment plan required by condition 4-1 and shall make those reports available when requested by the CEO.	All compliance assessments retained in hardcopy and electronic formats.	Reports available on request.	CEO	Overall	Ongoing (as per CAP)	C	2021 CAR available on Doral website.
810:M4.5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within two business days of that non-compliance being known.	The Resident Manager shall advise the CEO in writing of any potential non-compliance as soon as such incidences are known.	Email and follow up letter to CEO dated within two business days of identification of the incident.	CEO	Overall	Within two business days	C	No non-compliances recorded during 2021 report period.
810:M4.6	Compliance Reporting	The proponent shall submit a compliance assessment report annually from the date of issue of this Implementation Statement addressing the previous twelve month period or other period as agreed by the CEO.	The compliance assessment report shall: a. be endorsed by the proponent's Managing Director or a person, approved in writing by the CEO, delegated to sign on the Managing Director's behalf; b. include a statement as to whether the proponent has complied with the conditions; c. identify all potential non-compliances and describe corrective and preventative actions taken; d. be made publicly available in accordance with the approved compliance assessment plan; and e. indicate any proposed changes to the compliance assessment plan required by condition 4-1.	CAR submitted.	CEO	Overall	Annually, by 19 October each year	C	This report, 2021 CAR is the 12 th report.

APPENDIX 1: ATTACHMENT 2 - AUDIT TABLE

Keysbrook Mineral Sands Mine, Ministerial Statements, 810, 984 & 1089
 Keysbrook Leucoxene Pty Ltd
 Shire of Serpentine-Jarrahdale and Shire of Murray

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Phase	Timeframe	Status	Further Information
810:M5.1	Performance Review and Reporting	The proponent shall submit to the CEO a Performance Review Report at the conclusion of the first year after the start of implementation and then, at a minimum of triennial intervals, which addresses: a. the major environmental risks and impacts; the performance objectives, standards and criteria related to these; the success of risk reduction/impact mitigation measures and results of monitoring related to management of the major risks and impacts. b. the level of progress in the achievement of best practice environmental performance, including industry benchmarking, and the use of best available technology where practicable. c. improvements gained in environmental management which could be applied to this and other similar projects.	Undertake performance review after the first year following implementation, then triennially.	Performance Review Report (PRR) submitted to CEO. PRR addresses all of the required items.	CEO	Overall	At the conclusion of the first year after the start of implementation and then, at a minimum of triennial intervals.	CLD	Performance Review Report submitted 22 December 2016. Triennial Performance Review Report submitted 18 December 2019.
810:M6.1	Protection of native vegetation	Prior to the commencement of clearing, the proponent shall, in consultation with the DEC, ensure that a minimum of 75 hectares of native vegetation within the area cross-hatched red in Figure 3 is protected in perpetuity by an instrument or instruments approved by the CEO.	Consult with DEC and landowner/s to determine the exact boundaries of 75 hectare offset. Produce maps of this area and accurately peg the ground. Agreement with landowner/s to protect the 75 hectare offset by an approved instrument.	Accurate map of 75 hectare offset. Copy of protection instrument.	Min for Env	Pre-construction	Prior to the commencement of clearing	CLD	Letter from Office of the Environmental Protection Authority (OEPA) dated 29 November 2012 confirming appropriate instrument for protection. Protection instruments granted: • Conservation Covenant dated 08 12 2014 for Lot 202 on deposited Plan 68316. • Agreement to Reserve for Lot 62 on deposited Plan 739.
810:M6.2	Protection of native vegetation	The instrument or instruments referred to in 6-1 shall include the following: a. measures to protect the area from grazing stock. b. measures which have the objective of maintaining a functioning and self-sustaining vegetation community.	The 75 hectare offset shall be fenced. Protection instrument includes rehabilitation and management measures.	Photographs of completed fencing. Protection instrument addresses maintaining self sustaining vegetation in this area.	Min for Env	Pre-construction	Prior to the commencement of clearing	C	Fencing remains intact. Sections upgraded during reporting period. Protection instruments provided to OEPA previously are unchanged.
810:M6.3	Protection of native vegetation	The proponent shall not clear any native vegetation within the proposal area unless the land to be cleared is required for the extraction of mineral ore within six months of the date of the clearing.	All land clearing to be authorised under an internal permit system. Short and long term mining plans developed to base land clearing forecasts on.	Internal clearing permits kept on file. No cleared land left untouched for more than 6 months. Mine plan vs actual mine activity records.	Min for Env	Overall	Ongoing	C	No unauthorised clearing within the reporting period. Mine Plans/Schedule and mine activity available at Doral.
810:M7.1	Protection of watercourses and wetlands	The proponent shall not clear vegetation or undertake mining activities: a. within 20 metres of the banks of watercourses shown in Figure 9 of the PER document. b. within 100 metres of the boundary of a conservation category wetland.	All land clearing to be authorised under an internal permit system. Boundaries of clearing areas near watercourses and conservation category wetlands to be accurately surveyed and flagged.	Map showing extent of cleared areas and buffer areas. Site inspection of buffer areas.	CEO	Overall	Ongoing	C	Plans/Schedule and mine activity available at Doral. Refer to Appendix 4 Ground Disturbance Summary February 2015 – July 2021.

APPENDIX 1: ATTACHMENT 2 - AUDIT TABLE

Keysbrook Mineral Sands Mine, Ministerial Statements, 810, 984 & 1089
 Keysbrook Leucoxene Pty Ltd
 Shire of Serpentine-Jarrahdale and Shire of Murray

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Phase	Timeframe	Status	Further Information
810:M7.2	Protection of watercourses and wetlands	The proponent shall implement management measures (including but not limited to weed and disease control, revegetation and monitoring) in respect to the areas under 7-1 to achieve a functioning and self-sustaining vegetation community.	Implementation of the Weed and Dieback Management Plan. Implementation of the Rehabilitation Management Plan (RMP).	Rehabilitation Management Plan (RMP). Weed and Dieback Management Plan (WDMP). Pre and post project commencement vegetation monitoring within the areas shows no degradation.	CEO	Overall	Ongoing	C	Weed control and native species planting undertaken within and adjacent to watercourse buffers in 2021 (18ha).
810:M8.1	Rehabilitation Management Plan	Prior to the commencement of operations, the proponent shall submit a Rehabilitation Management Plan to the requirements of the CEO.	Prepare Rehabilitation Management Plan and submit to the CEO.	RMP submitted. RMP approval by CEO.	CEO	Pre-construction	Prior to the commencement of operations	C	RMP approval by CEO on 2 March 2012. Revised March 2013 following Change to Proposal under S45C. Revised draft under internal review.
810:M8.2	Rehabilitation Management Plan	The objectives of the Plan are to: a. re-establish self-sustaining local provenance native vegetation cleared in the implementation of the proposal, at a ratio of not less than 1:4:1 (1.4 hectares of revegetation per 1 hectare of vegetation cleared). b. re-establish functioning pasture.	Prepare RMP to meet objectives.	RMP contains required information.	CEO	Pre-construction	Prior to the commencement of operations	C	RMP approval by CEO on 2 March 2012. Revised March 2013 following Change to Proposal under S45C. Revised rehabilitation/revegetation concept achieves native revegetation target. Revegetation programme progressed. Functioning pasture demonstrated in rehabilitation (Appendix 7).
810:M8.3	Rehabilitation Management Plan	The Rehabilitation Management Plan shall: a. describe measures to protect the areas to be revegetated from access, including grazing by stock. b. identify measures to translocate native plant species cleared for mining into revegetated areas. c. identify measures to eradicate weeds in the revegetated areas. d. identify measures to use dieback un-infested topsoil and dieback resistant species in the revegetated areas. e. describe a strategy to revegetate areas, including the use of local species of local provenance, and establishment of middle storey and understorey species. f. identify completion criteria for revegetation. g. outline a revegetation monitoring programme.	Prepared RMP as outlined.	RMP contains required information. Monitoring program developed.	CEO	Pre-construction	Prior to the commencement of operations	C	RMP approval by CEO on 2 March 2012. Revised March 2013 following Change to Proposal under S45C. Currently under revision to improve practicability and reflect amended dieback status (Dieback Risk Assessment Terratree August 2017). Revised draft under internal review.

APPENDIX 1: ATTACHMENT 2 - AUDIT TABLE

Keysbrook Mineral Sands Mine, Ministerial Statements, 810, 984 & 1089
 Keysbrook Leucoxene Pty Ltd
 Shire of Serpentine-Jarrahdale and Shire of Murray

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Phase	Timeframe	Status	Further Information
810:M8.4	Rehabilitation Management Plan	The proponent shall implement the Rehabilitation Plan.	Implementation of the RMP.	Rehabilitation activities completed as per RMP. Monitoring program implemented. Internal annual audit.	CEO	Overall	Ongoing	C	RMP is being implemented.
810:M8.5	Rehabilitation Management Plan	The proponent shall review and revise the Rehabilitation Plan as and when directed by the CEO.	RMP to be reviewed annually and when directed by CEO to ensure it remains relevant.	RMP contains review history.	CEO	Overall	Annually and when directed by the CEO	NR	Revised draft under internal review. Overall native rehabilitation/revegetation concept revised and agreed with key landholder (Lot 300 and Lot 59). Discussions with other landowners ongoing.
810:M8.6	Rehabilitation Management Plan	The proponent shall implement revisions of the Rehabilitation Plan required by condition 8-5.	Implement any revisions to the RMP.	Internal annual audit.	Min for Env	Overall	Ongoing and when directed by the CEO	NR	Plan currently under revision at KLPL initiation.
810:M8.7	Rehabilitation Management Plan	The proponent shall make the Rehabilitation Plan (including all amendments) publicly available in a manner approved by the CEO.	1. Proponents will make documents available on their website for the life of the project, unless otherwise instructed by the CEO. 2. Adherence to a condition in a Statement requiring public availability of documents must occur within 14 days of submission of the documents to the CEO, and 3. 14 days from the date of making documents publicly available, proponents shall provide evidence to the CEO to confirm that advertising or lodgement on website has been completed.	RMP available on Doral website. Date of lodging on web site within 14 days of provision to CEO. Letter to CEO sent within 14 days of plan being on website.	CEO	Overall	Within 14 days of submission and ongoing	C	Approved RMP is available on the Doral Website.
810:M8.8	Rehabilitation Management Plan	The proponent shall ensure grazing stock are excluded from areas described in condition 8-2(a).	Fences shall be constructed around areas rehabilitated to native vegetation.	Photographs of completed fencing. RMP contains measures to exclude stock.	CEO	Overall	Ongoing	C	Fencing intact. Sections upgraded during reporting period (Appendix 7). 57 hectare native rehabilitation area fenced with kangaroo and feral animal proof fencing during the reporting period.
810:M9.1	Weed and Dieback Management	Prior to the commencement of operations, the proponent shall prepare and submit a Dieback and Weed Management Plan to the requirements of the CEO.	Prepare a Weed and Dieback Management Plan and submit to the CEO.	WDMP submitted. WDMP approval by CEO.	CEO	Pre-construction	Prior to the commencement of operations	C	WDMP approval by CEO on 29 June 2011. Revised Weed and Dieback Management Plan (April 2018, ref. 154280) submitted for approval 10 May 2018. Response received 8 May 2019. Meeting with EPA 15 August 2019. Amendments in process.

APPENDIX 1: ATTACHMENT 2 - AUDIT TABLE

Keysbrook Mineral Sands Mine, Ministerial Statements, 810, 984 & 1089
 Keysbrook Leucoxene Pty Ltd
 Shire of Serpentine-Jarrahdale and Shire of Murray

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Phase	Timeframe	Status	Further Information
810:M9.2	Weed and Dieback Management	The proponent shall implement the Plan.	Implement WDMP.	Internal annual audit.	CEO	Overall	Ongoing, following the commencement of operations	C	Implementation of plan ongoing. Map of significant weed control activities detailed at Appendix 5.
810:M10.1	Nutrient mobilisation	Prior to the commencement of operations, the proponent is to submit a Nutrient Management Plan to the requirements of the CEO.	Prepare Nutrient Management Plan and submit to CEO.	Nutrient Management Plan (NMP) submitted. NMP approval by CEO.	CEO	Pre-construction	Prior to the commencement of operations	CLD	NMP approval by CEO on 31 July 2012.
810:M10.2	Nutrient mobilisation	The objective of the Plan is to ensure the proposal assists in meeting the water quality objectives of the Peel-Harvey Water Quality Improvement Plan.	Prepare NMP to meet objectives.	NMP.	CEO	Pre-construction	Prior to the commencement of operations	CLD	NMP approval by CEO on 31 July 2012.
810:M10.3	Nutrient mobilisation	The Plan shall: a. outline a programme to monitor nutrient levels within the proposal area and at the downstream boundary of the proposal area. b. identify nutrient trigger levels consistent with the Peel-Harvey Water Quality Improvement Plan. c. identify management actions should a trigger level be reached.	Include details of monitoring programme in NMP.	NMP.	CEO	Construction	Prior to the commencement of operations	CLD	NMP approval by CEO on 31 July 2012.
0.	Nutrient mobilisation	The proponent shall implement the Nutrient Management Plan.	Implement the NMP.	Internal annual audit.	Min for Env	Overall	Ongoing, following the commencement of operations	C	Implementation of plan ongoing.
810:M10.5	Nutrient mobilisation	The proponent shall make the Nutrient Management Plan available to the public in manner approved by the CEO.	1. Proponents will make documents available on their website for the life of the project, unless otherwise instructed by the CEO. 2. Adherence to a condition in a Statement requiring public availability of documents must occur within 14 days of submission of the documents to the CEO. 3. 14 days from the date of making documents publicly available, proponents shall provide evidence to the CEO to confirm that advertising or lodgement on website has been completed.	NMP available on the Doral website. Date of lodging on web site within 14 days of provision to CEO. Letter to CEO sent within 14 days of plan being on website.	DoW	Overall	Within 14 days of submission and ongoing	C	NMP is available on the Doral website.
810:M11.1	Water Management	The abstraction of any groundwater required for the implementation of this proposal shall not materially effect the quality or quantity of groundwater available to other users in the area, or adversely affect the health and condition of native vegetation and ecosystems in the area.	Groundwater monitoring as per Water Management Plan. Abstraction managed as per groundwater licence conditions.	Results of groundwater monitoring programme. Abstraction in compliance with groundwater licence conditions.	DoW	Overall	Ongoing	C	Refer to Appendix 6 Annual Groundwater Monitoring Summary Report 2019 (Groundwater Resource Management March 2020) No impacts to vegetation health, ecosystems, other users identified. Compliance with groundwater licence conditions.
810:M11.2	Water Management	Prior to the commencement of operations, the proponent shall revise the Water Management Plan to the requirements of the Department of Water.	Revise the Water Management Plan and submit to DoW.	Water Management Plan (WMP) submitted to DoW. DoW comments received. WMP review history.	DoW	Pre-construction	Prior to the commencement of operations	CLD	WMP Notification of completion to satisfaction of DoW 28 May 2013.

APPENDIX 1: ATTACHMENT 2 - AUDIT TABLE

Keysbrook Mineral Sands Mine, Ministerial Statements, 810, 984 & 1089
 Keysbrook Leucoxene Pty Ltd
 Shire of Serpentine-Jarrahdale and Shire of Murray

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Phase	Timeframe	Status	Further Information
810:M11.3	Water Management	The objective of the Plan is to comply with condition 11-1.	Prepare WMP to meet objective.	WMP.	DoW	Pre-construction	Prior to the commencement of operations	CLD	WMP Notification of completion to satisfaction of DoW 28 May 2013.
810:M11.4	Water Management	The Plan shall: a. outline a programme to monitor groundwater quality and quantity, including monitoring of bores located on surrounding properties, and at the downstream boundary of the project area, b. monitor the health and condition of native vegetation within the project area to ensure that it is not affected by groundwater drawdown associated with the proposal. c. identify groundwater trigger levels and management actions should a trigger level be reached. d. identify measures to provide an alternative source of water, particularly to surrounding groundwater users, where monitoring in item (a) indicates that mining activities has adversely affected water quality to the point where it cannot be used for its intended purpose or ecosystem maintenance. e. identify measures to ensure that the quality and quantity of groundwater is maintained post-mining. f. identify measures to minimise impacts associated with the discharge of excess water. g. outline a monitoring programme to detect any adverse impacts to the water quality, water levels or vegetation health of the conservation category wetlands adjacent to the mine area. h. identify management measures in the event that monitoring in item (g) detects adverse impacts to conservation category wetlands adjacent to the mine area as a result of the proposal.	Include details of monitoring programme in WMP.	WMP.	CEO	Pre-construction	Prior to the commencement of operations	CLD	WMP Notification of completion to satisfaction of DoW 28 May 2013.
810:M11.5	Water Management	The proponent shall implement the Water Management Plan.	Implement WMP.	Internal annual audit.	CEO	Overall	Ongoing, following the commencement of operations	C	Implementation of plan ongoing.
810:M11.6	Water Management	The proponent shall review and revise the Water Management Plan as and when directed by the CEO.	WMP reviewed annually and when directed by CEO to ensure it remains relevant.	WMP contains review history.	CEO	Overall	Annually and when directed by the CEO	C	WMP revised in 2015 to include water conditions of Works Approval (number W5386/2013/1) WMP (Revision B) 2015. Plan currently under revision.
810:M11.7	Water Management	The proponent shall implement revisions of the Water Management Plan required by condition 11-6.	Implement all revisions to WMP.	Internal annual audit.	Min for Env	Overall	Ongoing and when directed by the CEO	C	WMP (Revision B) is being implemented.

APPENDIX 1: ATTACHMENT 2 - AUDIT TABLE

Keysbrook Mineral Sands Mine, Ministerial Statements, 810, 984 & 1089
 Keysbrook Leucoxene Pty Ltd
 Shire of Serpentine-Jarrahdale and Shire of Murray

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Phase	Timeframe	Status	Further Information
810:M11.8	Water Management	The proponent shall make the Water Management Plan (including amendments) publicly available in a manner approved by the CEO.	1. Proponents will make documents available on their website for the life of the project, unless otherwise instructed by the CEO. 2. Adherence to a condition in a Statement requiring public availability of documents must occur within 14 days of submission of the documents to the CEO. 3. 14 days from the date of making documents publicly available, proponents shall provide evidence to the CEO to confirm that advertising or lodgement on website has been completed.	WMP available on the Doral website. Date of lodging on website within 14 days of provision to CEO. Letter to CEO sent within 14 days of plan being on website.	Min for Env	Overall	Within 14 days of submission and ongoing	C	WMP (Revision B) is available to view via Doral website.
810:M12.1	Acid Sulphate Soils Management	The proponent shall not: a. lower the depth of the water table to below that required for accessing the orebody. b. cause acid sulphate soil contamination either within the proposal area or elsewhere.	Undertake monitoring as per the WMP and Acid Sulphate Soils Management Plan (ASSMP).	Results of Water and Acid Sulphate Soils monitoring programmes.	CEO	Overall	Ongoing	C	Seasonal pit dewatering only. Short term (< 3months) reduction in localised water table. No significant potential acid sulfate soil encountered to date.
810:M12.2	Acid Sulphate Soils Management	The proponent shall implement the Acid Sulphate Soils Management Plan.	Implement Acid Sulphate Soils Management Plan.	Internal annual audit.	CEO	Overall	Ongoing	C	Implementation ongoing
810:M12.3	Acid Sulphate Soils Management	Upon identifying monitoring results indicating exceedance of trigger levels specified in the Acid Sulphate Soils Management Plan the proponent shall: a. report the monitoring results to the CEO within seven days. b. submit details of the management measures proposed to be implemented to address the exceedance results to the CEO within seven days. c. implement the management measures proposed to address the exceedance.	The Resident Manager will inform the CEO in writing of any exceedance of trigger levels as soon as the exceedance is known, together with proposed measures to address exceedance.	Monitoring results. Letter to CEO dated within seven days of identification of exceedance.	CEO	Overall	Within seven days of identifying exceedance of trigger levels	C	No ASS identified during the reporting period.
810:M12.4	Acid Sulphate Soils Management	Details of any reports under the Management Plan or condition 12-3 shall be publicly available in a manner approved by the CEO.	1. Proponents will make documents available on their website for the life of the project, unless otherwise instructed by the CEO. 2. Adherence to a condition in a Statement requiring public availability of documents must occur within 14 days of submission of the documents to the CEO. 3. 14 days from the date of making documents publicly available, proponents shall provide evidence to the CEO to confirm that advertising or lodgement on website has been completed.	ASSMP and trigger level exceedance reports available on the Doral website. Date of lodging on web site within 14 days of provision to CEO. Letter to CEO sent within 14 days of being on website.	CEO	Overall	Within 14 days of submission and ongoing	NR	No reports required to be prepared under ASSMP during the reporting period.

APPENDIX 1: ATTACHMENT 2 - AUDIT TABLE

Keysbrook Mineral Sands Mine, Ministerial Statements, 810, 984 & 1089
 Keysbrook Leucoxene Pty Ltd
 Shire of Serpentine-Jarrahdale and Shire of Murray

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Phase	Timeframe	Status	Further Information
810:M13.1	Performance Bond	As security for the due and punctual observance and performance by the proponent of the requirements of conditions 6, 7, 8, 9, 10, 11, 12 and 15, the proponent shall, prior to commencement of operations, provide to the CEO, to be replaced every five years in accordance with 13-2, a financial assurance for the benefit of both the Minister and the CEO and which is in the form of an unconditional and irrevocable bank guarantee, from a guarantor acceptable to the CEO and in a form acceptable to the CEO, in the amount specified in condition 13-2.	Provide Bank Guarantee to CEO as detailed.	Bank Guarantee.	CEO	Pre-construction	Prior to commencement of operations then ongoing	CLD	Accepted by OEPA on 08 April 2015, as provided in 2015 CAR.
810:M13.2	Performance Bond	The financial assurance shall be for an initial amount of AUS\$3 million and shall be substituted on 1 July every year of operations in accordance with the following schedule: \$5,568 million for the year commencing on 1 July after a minimum of 12 months from the commencement of operations (year 2); \$6,356 million for the subsequent year commencing on 1 July (year 3); \$7,552 million for the subsequent year commencing on 1 July (year 4); \$8,304 million for the subsequent year commencing on 1 July (year 5); \$6,772 million for the subsequent year commencing on 1 July (year 6); \$5,584 million for the subsequent year commencing on 1 July (year 7); \$3,795 million for the subsequent year commencing on 1 July (year 8), with the fixed initial amount of each successive guarantee being indexed to inflation (being the Consumer Price Index, Perth).	Provide Bank Guarantee to CEO as detailed.	Bank Guarantee.	CEO	Overall	1 July each year after a minimum of 12 months from the commencement of operations	C	Accepted by OEPA on 08 April 2015, as provided in 2015 CAR. Year 2 Bond issued and accepted by the OEPA on 30 June 2017 (Guarantee No. DG612613418) EPA letter). Year 3 Bond issued and accepted by DWER on 3 July 2018 (Guarantee No. DG701043418). Year 4 Bond issued and accepted by DWER on 27 September 2019 (Guarantee No. LG0704544). EPAS requested the bond lodgement be delayed until the nominated proponent changed to KLPL which occurred on the 3 Sep 2019. Year 5 Bond issued and accepted by DWER on 27 September 2019 (Guarantee No. LG0704544). EPAS requested the bond lodgement be delayed until the nominated proponent changed to KLPL which occurred on the 3 Sep 2019. Year 6 Bond issued and accepted by DWER on 11 February 2021 (Guarantee No. LG0704988). Confirmation of acceptance of bond was delayed due to department reshuffle. Year 7 Bond issued and accepted by DWER on 15 July 2021 (Guarantee No. LG070094).

APPENDIX 1: ATTACHMENT 2 - AUDIT TABLE

Keysbrook Mineral Sands Mine, Ministerial Statements, 810, 984 & 1089
 Keysbrook Leucoxene Pty Ltd
 Shire of Serpentine-Jarrahdale and Shire of Murray

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Phase	Timeframe	Status	Further Information
810:M13.3	Performance Bond	In the event that the guarantor referred to in condition 13-1 terminates its liability under the bank guarantee by paying to the Minister or the CEO the balance of the financial assurance remaining unpaid, the CEO will hold the financial assurance (being the amount paid by the guarantor upon termination), as security for the due and punctual observance and performance by the proponent of the requirements of conditions 6, 7, 8, 9, 10, 11, 12 and 15, in an interest bearing account nominated by the CEO, with the interest accruing for the benefit of the Minister or the CEO.	N/A	N/A	CEO	Overall	In the event that the guarantor referred to in condition 13-1 terminates its liability	NR	
810:M13.4	Performance Bond	The financial assurance may be called on or used in accordance with section 86E of the Act if the proponent fails to implement the proposal in accordance with conditions 6, 7, 8, 9, 10, 11, 12 and 15.	N/A	N/A	Min for Env	Overall	If the proponent fails to implement the proposal in accordance with conditions 6, 7, 8, 9, 10, 11, 12 and 15	NR	
810:M13.5	Performance Bond	The financial assurance shall be discharged by the CEO and the Minister when the CEO has given the proponent written notice pursuant to section 86F(1) of the Act.	N/A	N/A	Min for Env	Overall	When the CEO has given the proponent written notice pursuant to section 86F(1) of the Act	NR	
810:M14.1	Noise Management	Unless otherwise agreed in writing between the proponent and the owner and any occupier of noise sensitive premises: a) the proposal must comply with the Noise Regulations at any building associated with a noise sensitive use at any noise sensitive premises; and b), outside the hours 0700 to 1900 Monday to Saturday, or on public holidays, no mining activity is to be undertaken within 1,500 metres of any building associated with a noise sensitive use at any noise sensitive premises.	Agreements with owners/occupiers likely to be affected by noise.	Landowner Agreements. Noise monitoring results. Mining activity records.	Min for Env	Overall	Ongoing	C	MZI programme seeking agreements in accordance with progression of the mine plan is ongoing. Compliance with Noise Regulations addressed in quarterly reports to DWER. Condition superseded by 1089:M14.1A and 1089:M14.1 on 8 Feb 2019.
1089:M14.1A	Noise Management	During the period up to twelve (12) months from the date of this Statement, the proponent shall manage the proposal as follows: (1) Unless otherwise agreed in writing between the proponent and the owner and any occupier of noise sensitive premises: a. the proposal must comply with the Noise Regulations at any noise sensitive premises. b. outside the hours 0700 to 1900 Monday to Saturday or on public holidays, no mining activity is to be undertaken within 1,500 metres of any noise sensitive premises. (2) The requirement in condition 14-1A(1) does not apply in respect of noise sensitive premises that are not being used for a noise sensitive purpose.	Agreements with owners/occupiers likely to be affected by noise.	Landowner Agreements. Noise monitoring results. Mining activity records.	Min for Env	Overall	Ongoing	C	KLPL programme seeking agreements in accordance with progression of the mine plan is ongoing. Compliance with Noise Regulations addressed in reports to DWER.

APPENDIX 1: ATTACHMENT 2 - AUDIT TABLE

Keysbrook Mineral Sands Mine, Ministerial Statements, 810, 984 & 1089
 Keysbrook Leucoxene Pty Ltd
 Shire of Serpentine-Jarrahdale and Shire of Murray

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Phase	Timeframe	Status	Further Information
1089:M14.1	Noise Management	After the period up to twelve (12) months from the date of this Statement, the proponent shall manage the proposal as follows, unless varied by 14-2 or 14-3: 1. no Mineral Processing Activity is to be undertaken at any time within two (2) kilometres of a highly sensitive area. 2. during the Day and Evening periods, no Mining Operations are undertaken within two (2) kilometres of a highly sensitive area. 3. during the Night Period, no Mining Operations are undertaken within three point three (3.3) kilometres of a highly sensitive area.	Agreements with owners/occupiers likely to be affected by noise.	Landowner Agreements. Noise monitoring results. Mining activity records.	Min for Env	Overall	Ongoing	C	Annual Noise Compliance Report 2021 is available to view via Doral website.
810:M14.2	Noise Management	Prior to an agreement being executed under 14-1, the proponent is to ensure owners and occupiers obtain independent legal advice on the meaning and effect of any such agreement.	Ensure owners/occupiers are aware of their right to independent legal advice on noise agreements.	Letter to affected owners/occupiers.	Min for Env	Overall	Prior to an agreement being executed under condition 14-1	G	All agreements have been subject to legal review by legal practitioners representing the owner/occupier. Condition superseded by 1089:M14.2 on 8 Feb 2019.
810:M14.2	Noise Management	The requirements in condition 14-1 do not apply in respect of a particular highly sensitive area if: 1) The proponent and the landowner and occupier of that highly sensitive area have agreed otherwise in writing. 2) Notwithstanding any agreement referred to in 14-2(1): a. Noise Emission levels received Indoors during the Evening period do not exceed 30 dBLA10 + Influencing Factor (Tonal adjustment is applicable). b. Noise Emission levels received Indoors during the Night Period do not exceed 25 dBLA10 + Influencing Factor (Tonal adjustment is applicable). c. The proponent shall ensure that highly sensitive areas have appropriate acoustic attenuation to demonstrate that Noise Emission levels received Indoors as defined in conditions 14-2(2)(a) and 14-2(2)(b) can be met at all times. d. The proponent shall assume worst case conditions for modelling and attenuation, to be verified by an independent acoustic, to be reported in accordance with condition 14-9.	Ensure owners/occupiers are aware of their right to independent legal advice on noise agreements. Undertake noise monitoring in accordance with the Noise Monitoring Plan.	Letter to affected owners/occupiers. Noise monitoring results, Quarterly and annual Acoustic Reports submitted.	Min for Env	Overall	Ongoing	C	All agreements have been subject to legal review by legal practitioners representing the owner/occupier. Quarterly reports submitted for Q1, Q2, Q3, Q4, Q5, Q6, Q7, Q8, Q9, Q10, Q11, Q12 and 23rd October 2018 to 19th July 2019 of operations. Annual Noise Compliance Report submitted for 2019, 2020 and 2021. Annual Noise Compliance Report for 2021 submitted with CAR (Appendix 8) and available on Doral Website.
810:M14.3	Noise Management	Unless registered on the relevant land title, an agreement obtained under 14-1 does not bind successive owners or occupiers.	Ensure discussions are held with owners/occupiers if changes to the current owners/occupiers occur.	Letter to affected owners/occupiers.	CEO	Overall	N/A	NR	Condition superseded by 1089:M14.3 on 8 Feb 2019.

APPENDIX 1: ATTACHMENT 2 - AUDIT TABLE

Keysbrook Mineral Sands Mine, Ministerial Statements, 810, 984 & 1089
 Keysbrook Leucoxene Pty Ltd
 Shire of Serpentine-Jarrahdale and Shire of Murray

Audit Code	Subject	Requirement	How	Evidence	Satisfy	Phase	Timeframe	Status	Further Information
810:M14.3	Noise Management	The requirements in condition 14-1 may be varied or substituted if: 1) the proponent prepares and submits a Noise Management and Monitoring Plan (NMMP) to the CEO, in accordance with condition 14-4, which demonstrates that reduced distances will achieve compliance with the Noise Regulations. 2) the CEO approves in writing the NMMP for the purpose of varying condition 14-1. 3) the proponent implements the provisions of the approved NMMP.	Complete and submit a Noise Management and Monitoring Plan (NMMP) and ensure, post approval, the provisions within the plan are implemented.	Approved Noise Management and Monitoring Plan (NMMP)	CEO	Overall	Ongoing	NR	Not required at this stage.
810:M14.4	Noise Management	Noise monitoring shall be undertaken in a manner consistent with the Noise Monitoring Plan, and shall include monitoring of noise levels at a location or locations representative of the noise sensitive premises closest to the active mining area for which the proponent does not have written agreement in place under 14-1.	Undertake noise monitoring in accordance with the Noise Monitoring Plan.	Noise monitoring results. Mining activity records.	CEO	Overall	Ongoing in accordance with the Noise Management Plan	C	Implementation of Noise Monitoring Plan ongoing. Quarterly Noise Reports submitted to OEPADWER Condition superseded by 1089:M14.4 on 8 Feb 2019.
810:M14.4	Noise Management	The NMMP submitted under condition 14-3(1) must include: 1) a calibrated noise model that assumes worst case meteorological conditions for noise propagation and tonal characteristics at all times, that is validated by an independent acoustic expert, 2) noise monitoring to include noise levels at a location or locations representative of the highly sensitive area closest to the area for which varied distances to those defined in condition 14-1 are proposed to apply. 3) details of management measures, including but not limited to, any actions undertaken to reduce noise emissions from the proposal, monitoring, and reporting. 4) community consultation that has been undertaken, including any agreement on implementation of noise mitigation measures with residents. 5) the procedure and data reporting to demonstrate compliance in the event of a community complaint regarding operational noise, or at the request of the CEO.	Complete and submit a Noise Management and Monitoring Plan (NMMP) and ensure, post approval, the provisions within the plan are implemented.	Approved Noise Management and Monitoring Plan (NMMP)	CEO	Overall	Ongoing	NR	Not required at this stage.
810:M14.5	Noise Management	The proponent shall submit quarterly reports to the CEO, prepared by an independent acoustic expert, which include the following: a, reviews noise monitoring methodology and results for the quarter; b, an assessment of the extent to which noise emissions from the proposal comply with the Noise Regulations; and c, details of any management or other measures that the proponent has implemented, or proposes to implement, to abate emissions, and to prevent non-compliance with the Noise Regulations, and the effectiveness of any measures that have been implemented.	Engage a noise consultant to prepare quarterly acoustic reports.	Quarterly Acoustic Reports submitted.	CEO	Overall	Quarterly, within four weeks of the end of the quarter, with the first report due within four months of the commencement of operations	C	Quarterly reports submitted for Q1, Q2, Q3, Q4, Q5, Q6, Q7, Q8, Q9, Q10 & Q11 of operations. Condition superseded by 1089:M14.5 on 8 Feb 2019.
810:M14.5	Noise Management	The proponent shall review and revise the NMMP as and when directed by the CEO.	Revise NMMP and submit to CEO.	NMMP review history. NMMP approval by CEO.	CEO	Overall	As directed by CEO.	NR	Not required at this stage.

Appendix 2

Assessment of Compliance against Schedule 1 of MS810

Schedule 1 of MS810 Compliance Status

Audit Code	Element	Requirement		Status	Further Information
Schedule 1 of MS810	Proposal Summary	An area of up to 30 hectares will be progressively mined at any time.		Compliant	Mine Plan (Requirement interpreted as 30 ha of mine face and clearing ahead of mining. Once mined open ground classified as tailing area)
		Waste from the processing will be used as backfill in the mined areas.		Compliant	Mine Plan
		Backfilled areas will be progressively re-contoured and stabilised prior to topsoil replacement and return to pasture or native vegetation.		Compliant	Mine Plan. Rehabilitation areas
Schedule 1 of MS810:Table1	Land Tenure over the mining area	Keysbrook	North Dandalup	Compliant	Mine area is on private freehold land.
		<ul style="list-style-type: none"> Part Lot 56 Westcott Rd Part Lot 57 Elliott Rd Part Lot 1 Elliott Rd Part Lot 52 Westcott Rd Part Lot 111 Westcott Rd Lot 112 Westcott Rd Lot 113 Westcott Rd Part Lot 6 Westcott Rd Part Lot 63 Hopeland Rd Lot 112 Westcott Rd Lot 101 Westcott Rd Lot 103 Westcott Rd Lot 104 Westcott Rd Lot 105 Westcott Rd 	<ul style="list-style-type: none"> Part Lot 62 Hopeland Rd Part Lot 59 Westcott Rd Part Lot 300 Westcott Rd Part Lot 49 Readheads Rd Part Lot 7 Readheads Rd Part Lot 6 Readheads Rd Part Lot 44 Readheads Rd 		

2021 COMPLIANCE ASSESSMENT REPORT

Audit Code	Element	Requirement	Status	Further Information
	Life of Mine	Approximately 9 Years	Compliant	Project commenced in February 2015. Productive mining commenced in October 2015.
	Product Quantity	Approximately 1 020 000 tonnes of heavy mineral concentrate.	Compliant	Doral Annual Financial Reports
	Pit Depth	Average 2 metres below ground level, and up to 6 metres on sandy dunes	Compliant	Survey Records, Mine Plans
	Proposal Area	Up to 1,532 hectares	Compliant	Aerial imagery, mine plans. Appendix 4 Note: Proposal area treated as mine area + WCP area as per Figure 2 Attachment 3 of MS 810 (i.e excludes other infrastructure footprint on existing cleared land)
	Dewatering	In-pit sumps to dewater the superficial Bassendean Sand aquifer at 0.2 gegalitres per annum	Compliant	Appendix 6 Keysbrook Mineral Sands Project Annual Groundwater Monitoring Summary 2020 (Groundwater Resource Management, March 2021) identified net recharge of superficial aquifer from production water circuit.
	Bore abstraction	Up to 1.8 gegalitres per annum from two bores into the deep Leederville aquifer	Compliant	Appendix 6 Keysbrook Mineral Sands Project Annual Groundwater Monitoring Summary 2020 (Groundwater Resource Management, March 2021)

Appendix 3

Summary Audit Table

Implementation of Management Plans required under MS810.

Table A3.1: Air Quality and Dust Management Plan Summary Audit Table

Section	Element	Requirement		Compliance Status	Evidence/Comments
1.1	Air Quality and Dust Objectives and Targets	Objective	Target		
		Ensure dust emissions from activities undertaken in implementing the proposal do not cause ambient dust concentration levels outside the boundary of the proposal area that are higher than:			<ul style="list-style-type: none"> Revised plan submitted for approval 13 June 2018 (Air Quality and Dust Management Plan, ref 154918 June 2018). Plan was approved by EPA on 20 March 2020.
		1,000 µg/m ³ of Total Suspended Particulates as a 15 minute average.	Ambient dust concentrations do not exceed 1,000 µg/m ³ at the nearest sensitive receptor or beyond the site boundary.	C	<ul style="list-style-type: none"> Additional E-Bam continuous TSP monitor commissioned 8 November 2017. No validated excursions of the TSP limit attributable to proposal implementation during the reporting period. Data is stored and accessed via a proprietary web-based platform provided by Envirosuite Ltd.
		50 µg/m ³ of PM10 as a 24 hour average, no more than five times per year.	Ambient dust concentrations do not exceed 50 µg/m ³ of PM10 at the nearest sensitive receptor or beyond the site boundary.	C	<ul style="list-style-type: none"> Three validated events of PM10 exceeding 50 µg/m³ attributable to mining operations recorded in the reporting period. Data is stored and accessed via a proprietary web-based platform provided by Envirosuite Ltd.

APPENDIX 3 MANAGEMENT PLAN IMPLEMENTATION

Section	Element	Requirement		Compliance Status	Evidence/Comments
		Identify measures to reduce dust emissions.	Implement measures to reduce dust emissions as identified in this AQDMP.	C	Dust suppression measures implemented including: <ul style="list-style-type: none">• Suspension, or modification, of field operations• Surface stabilisation using sprayed clay mixture or cover crop• Utilisation of 3 water trucks• Rehabilitation of open ground• Dust cropping of unrehabilitated open ground

APPENDIX 3 MANAGEMENT PLAN IMPLEMENTATION

Section	Element	Requirement		Compliance Status	Evidence/Comments
		Ensure that dust emissions do not harm or adversely affect environmental values or the health, welfare and amenity of people and land uses.	Less than 2 valid complaints related to dust and air quality received in a calendar year.	NC	<p>Nine valid dust complaints (related to three specific dust events) received during the reporting period. These complaints were related to three specific dust events which occurred between January and February 2021. These dust events were voluntarily reported to DWER Compliance Branch on 5 February 2021. Subsequently the EPA undertook a rigorous audit of the site to assess compliance against Ministerial Statement 810. The audit concluded on 10 September 2021, with the following closure statement:</p> <p><i>'The Department of Water and Environmental Regulation has reviewed the evidence provided and the outcome of the audit and advises that Keysbrook Leucoxene Pty Ltd is found to be compliant with the implementation conditions of Ministerial Statement 810.'</i></p> <p>The audit closure letter is available in Appendix 10.</p>

Table A3.2: Acid Sulphate Soil Management Plan Summary Audit Table

Section	Element	Requirement		Compliance Status	Evidence
1	Management Objectives and Targets	Objective	Target		
		Avoid disturbance of PASS soils.	No inadvertent disturbance of PASS soils.	C	<ul style="list-style-type: none"> No material disturbance of PASS to date (source: KLPL ASS Results spreadsheet).
		Prevent acid generation from disturbed soils.	Acidity and metal concentrations in surface and groundwater to be maintained at pre-mining levels.	C	<ul style="list-style-type: none"> Monitoring data does not indicate any adverse trend in acidity and metal concentrations (source: KLPL water monitoring spreadsheet).
		All employees and contractors will be aware of ASS issues relating to the project and their responsibilities.	All employees and contractors instructed on content of the ASSMP in the induction process.	C	<ul style="list-style-type: none"> ASS information included in induction presentation, notwithstanding limited risk.
6	Management and Mitigation Measures	<ul style="list-style-type: none"> Undertake materials monitoring (ore, tails, mine void floor). Undertake water quality monitoring (in pit sump, process water recovered from backfilling, process water dam). 		C	<ul style="list-style-type: none"> Monitoring programme implemented (KLPL ASS Results spreadsheet, KLPL water monitoring spreadsheet).
		<ul style="list-style-type: none"> Implement measures to mitigate acid risk 		NR	<ul style="list-style-type: none"> No PASS material disturbed.

Table A3.3: Noise Monitoring Plan Summary Audit Table

Section	Element	Requirement	Compliance Status	Evidence
1	Aim	Set out a noise monitoring regime for the Keysbrook Mine that: <ul style="list-style-type: none"> provides for effective management of project noise emissions. 	C	<ul style="list-style-type: none"> Several Noise Monitoring Plans applicable to reporting period: <ul style="list-style-type: none"> Noise Monitoring Plan, August 2011, 511442-11b, Lloyd George Acoustics Noise Monitoring Plan (Keysbrook Leucoxene, September 2017) <i>updated plan submitted to DWER September 2017.</i> Enhanced noise monitoring exceeded requirements of monitoring plans.
		<ul style="list-style-type: none"> provides an informed basis for planning noise reduction and improvement measures. 	C	<ul style="list-style-type: none"> Structured noise attenuation programme implemented (ongoing).
		<ul style="list-style-type: none"> enables assessment and demonstration of compliance with applicable assigned levels at nearby noise sensitive premises to the extent that is reasonable and practicable. 	C	<ul style="list-style-type: none"> Keysbrook environmental noise compliance assessments and reporting completed. Annual Noise Compliance Report 2021 (Appendix 8 as required under MS1089) undertaken by SVT Engineering Consultants/Wood Group. Keysbrook Mineral Sands Mine Section 46 Inquiry Report (KLPL, June 2017). Keysbrook Mineral Sands Mine – Inquiry Under Section 46 of the Environmental Protection Act 1986 to Amend Ministerial Statement 810 Inquiry Report (KLPL, Dec 2018).

Table A3.4: Nutrient Management Plan Summary Audit Table

APPENDIX 3 MANAGEMENT PLAN IMPLEMENTATION

Section	Element	Requirement	Compliance Status	Evidence
1	Purpose	<ul style="list-style-type: none"> • Ensure proposal assists in meeting the water quality objectives of the Peel Harvey Water Quality Improvement Plan. • Outline a program to monitor nutrient levels within the proposal area and at the downstream boundary of the proposal area. • Identify nutrient trigger levels consistent with the Peel-Harvey Water Quality Improvement Plan. • Identify management actions should a trigger level be reached. • Minimise the export of nutrients, especially phosphorus and nitrogen, from the project area during operational and decommissioning phases of the project. 	C	<ul style="list-style-type: none"> • Management plan approved.
3 - 6	Management	<ul style="list-style-type: none"> • Implement land rehabilitation programme • Manage fertiliser applications based on soil sampling and following consultation with Department of Primary Industries and Regional Development (DPIRD). 	C	<ul style="list-style-type: none"> • 592ha pasture rehabilitation completed to 15 July 2021. Sampling indicates improved nutrient retention capacity. • Soil amendment programme based on agronomist advice. • Fertiliser regime on rehabilitated pasture determined in consultation with agronomist.

APPENDIX 3 MANAGEMENT PLAN IMPLEMENTATION

Section	Element	Requirement	Compliance Status	Evidence
7	Monitoring	<ul style="list-style-type: none">• Implement soil testing programme prior to ground disturbance and of reconstructed soils.• Evaluate clay properties for re-incorporation into soil.• Implement water quality monitoring programme.	C	<ul style="list-style-type: none">• Soil sampling completed.• Clay material characterised – favourable for nutrient retention.• Water monitoring programme implemented (ongoing).

Table A3.5: Rehabilitation Management Plan Summary Audit Table

Section	Element	Requirement	Compliance Status	Evidence
1	Objectives	<ul style="list-style-type: none"> Re-establish self-sustaining local provenance native vegetation cleared in the implementation of the proposal, at a ratio of not less than 1.4 to 1 (1.4 hectares of revegetation per 1 hectare of vegetation cleared). Re-establish functioning pasture. 	C	<ul style="list-style-type: none"> 16ha of native revegetation planting undertaken in 2021, bringing the total of native revegetation undertaken to 60ha. Native revegetation corridor planting completed during rehabilitation period (Appendix 7). 2017, 2018, 2019, 2020 and 2021 pasture rehabilitation demonstrating establishment of functioning pasture (Appendix 7). Native vegetation rehabilitation program, based on a combination of seeding and 30,000 tube stock seedlings, commenced across 16ha of previously grazed land. Rehabilitation Management Plan under revision. Improved native rehabilitation concept developed and agreed with key landholder (Lot 300 and Lot 59).

APPENDIX 3 MANAGEMENT PLAN IMPLEMENTATION

Section	Element	Requirement	Compliance Status	Evidence
3.2	Rehabilitation procedures	<ul style="list-style-type: none"> Vegetation clearing – material salvaged (nest hollows, timber, firewood, seed); remnant material mulched. Topsoil stripping and storage. Reconstructed landform similar to pre-mining contours. Use of appropriate pasture seed mixes, fertiliser types and rates. 	C	<ul style="list-style-type: none"> Preparatory works for native vegetation ongoing (e.g. seed collection, plant translocation) (Appendix 7). Native vegetation rehabilitation program, based on a combination of seeding and 30,000 tube stock seedlings, commenced across 16ha of previously grazed land. 594ha pasture rehabilitation completed to 15 July 2021. Discussions with landholders as to detailed land plans (post rehabilitation) ongoing.
6	Monitoring	<p>Monitoring to assess:</p> <ul style="list-style-type: none"> The physical stability of the landform of rehabilitated areas. The success of vegetation establishment in rehabilitated areas. 	NR	<ul style="list-style-type: none"> Monitoring native revegetation performance was not required to be carried out in the reporting period. Visual checks of pasture rehabilitation indicate good plant establishment and ground stability across multiple seasons.

APPENDIX 3 MANAGEMENT PLAN IMPLEMENTATION

Section	Element	Requirement	Compliance Status	Evidence
5	Conceptual Rehabilitation Plan	Reviewed on an annual basis.	C	<ul style="list-style-type: none">• Rehabilitation Management Plan under revision to improve practicability and reflect amended dieback status (Dieback Risk Assessment Terratree August 2017).• Overall native rehabilitation/ revegetation concept revised and agreed with key landholder (Lot 300 and Lot 59).• Consultation with other landowners ongoing.

Table A3.6: Water Management Plan Summary Audit Table

Section	Element	Requirement		Compliance Status	Evidence
1.2	Objectives and Targets	Objective	Target		
		Abstraction of groundwater does not materially affect the quality of groundwater available to other users in the area.	Monitoring indicates groundwater remains fit for applicable beneficial uses.	C	<ul style="list-style-type: none"> No impact to date Appendix 6 Annual Groundwater Monitoring Summary 2020 (Groundwater Resource Management, March 2021).
		Abstraction of groundwater does not materially affect the quantity of groundwater available to other users in the area.	Monitoring indicates the quantity of groundwater remains above that allocated to other users in the area.	C	<ul style="list-style-type: none"> No impact to date Appendix 6 Annual Groundwater Monitoring Summary 2020 (Groundwater Resource Management, March 2021).
		Abstraction of water does not cause adverse, long term impacts to the water quality or levels of Conservation Category wetlands.	Monitoring indicates water quality and levels are within trigger levels.	C	<ul style="list-style-type: none"> No proposal related adverse trends identified to date. Some water level trigger exceedances recorded, and levels recovered naturally with seasonal rainfall. Appropriateness and relevance of triggers to be reviewed, as recommended by reviewing hydrogeologist - Annual Groundwater Monitoring Summary 2020 (Groundwater Resource Management March 2021).
		Abstraction of groundwater does not	Monitoring indicates no adverse, long term	C	<ul style="list-style-type: none"> No adverse change recorded in wetland vegetation monitoring to date (Wetland Vegetation Monitoring Spring 2016 (Rockwater

APPENDIX 3 MANAGEMENT PLAN IMPLEMENTATION

Section	Element	Requirement	Compliance Status	Evidence
		adversely impact on the health and condition of native vegetation associated with Conservation Category wetlands.		May 2017); Wetland Vegetation Monitoring Autumn 2017 (Rockwater October 2017); Wetland Vegetation Monitoring Autumn 2018 (Rockwater, October 2018). <ul style="list-style-type: none"> Wetland Vegetation Monitoring Spring 2019 (Rockwater, January 2020) (Appendix 9). Wetland Vegetation Monitoring Spring 2020 (Rockwater, May 2021) (Appendix 9).
		To prevent or minimise any deterioration in surface water quality.	C	<ul style="list-style-type: none"> Plant stormwater passes through settling ponds and/or process water dam. Sewage wastewater treated through Shire approved apparatus. No water quality impact attributable to proposal implementation identified (Appendix 6 Annual Groundwater Monitoring Summary 2020 (Groundwater Resource Management March 2021).
		Monitor surface and ground water quality.	C	<ul style="list-style-type: none"> Extensive water monitoring programme implemented Appendix 6 Annual Groundwater

APPENDIX 3 MANAGEMENT PLAN IMPLEMENTATION

Section	Element	Requirement		Compliance Status	Evidence
			monitoring procedures.		Monitoring Summary 2020 (Groundwater Resource Management March 2021).
		Comply with regulatory requirements.	Compliance with all statutory conditions on water management and monitoring at Keysbrook.	C	<ul style="list-style-type: none">Appendix 6 Annual Groundwater Monitoring Summary 2020 (Groundwater Resource Management March 2021).

Table A3.7: Weed and Dieback Management Plan Summary Audit Table

Section	Element	Requirement		Compliance Status	Evidence
1.2	Weed and Dieback Management Objectives and Targets	Objective	Target		
		Weed Management			
		Prevent introduction of new weed species and/or spread of existing weed species as a result of mining.	No new weeds species or infestations as a result of mining practices.	C	<ul style="list-style-type: none"> No new weed species identified to date.
		Control of weeds to ensure the protection of remnant vegetation and vegetation within twenty metres of the banks of watercourses or within 100 meters of the boundary of the conservation category wetland.	No new weeds species or infestations in remnant vegetation or watercourse/wetland vegetation as a result of mining practices.	C	<ul style="list-style-type: none"> Proposal implementation has not impacted remnant vegetation areas outside of approved mine area. Watercourses are predominantly degraded (some are constructed irrigation channels) with limited remnant native vegetation. Weed control programme implemented within and around proposal area (Appendix 5).

APPENDIX 3 MANAGEMENT PLAN IMPLEMENTATION

Section	Element	Requirement		Compliance Status	Evidence
		Weeds in newly disturbed areas will be controlled as rehabilitation behind mining progresses.	6 months after rehabilitation, less than 10% weed species in rehabilitated areas.	NR	<ul style="list-style-type: none"> • Weed suppression undertaken over 16ha in advance of 2021 native revegetation corridor planting. • Weed suppression undertaken over 50ha in advance of 2022 native revegetation corridor planting. • Weed suppression undertaken on 2019 and 2020 native revegetation streamline planting. • Weed control in pasture areas constrained to declared weed species (Rehabilitation Management Plan). No declared species identified in inspections to date. Target/objective revised in updated plan submitted for approval on 10 May 2018 (Weed and Dieback Management Plan (April 2018). Comments received from EPA.
1.2		Dieback Management			

APPENDIX 3 MANAGEMENT PLAN IMPLEMENTATION

Section	Element	Requirement		Compliance Status	Evidence
	Weed and Dieback Management Objectives and Targets	Prevent spread of Dieback from Dieback Infected areas to Dieback Free Areas as a result of mining activities.	No spread of Dieback within the mine areas as a result of mining.	C	<ul style="list-style-type: none"> No Dieback free areas confirmed within the proposal area. A large majority of the proposal area is uninterpretable due to the absence of indicator species and some pocketed areas as dieback infected. (Phytophthora Dieback Assessment, Terratree 2013). Given the absence of indicator species in much of the proposal area, highly disturbed nature of remnant native vegetation and history of cattle grazing: <ul style="list-style-type: none"> ➤ it is not possible to reliably assess dieback spread. ➤ the consequences of any dieback spread on biodiversity values are negligible (Letter report to KLPL, Terratree, 14 August 2017). Weed and Dieback Management Plan revised to, in part, better reflect the dieback status of proposal area. Revised plan submitted for approval on 10 May 2018.
		Identify and implement measures to limit Dieback risk through the movement of topsoil.	Topsoil from Dieback infected areas not utilised in rehabilitation of Dieback free areas.	C	<ul style="list-style-type: none"> No dieback free areas identified (Phytophthora Dieback Assessment Terratree 2013).
		Identify and implement measures to protect Dieback free topsoil from contamination.	All topsoil from Dieback free areas stockpiled separately to topsoil from Dieback infected areas. All topsoil stockpiles signposted correctly.	C	<ul style="list-style-type: none"> No Dieback free areas identified (Phytophthora Dieback Assessment Terratree 2013).

APPENDIX 3 MANAGEMENT PLAN IMPLEMENTATION

Section	Element	Requirement		Compliance Status	Evidence
		Include awareness training into site induction and training programs.	100% inclusion of all site personnel in induction programs.	C	<ul style="list-style-type: none">Employee and contractor induction completed.

Appendix 4

Supporting Information:

Keysbrook Mineral Sands Mine

Ground Disturbance Summary

February 2015 – July 2021

