



SIMEC

MEMBER OF



2021 SOUTH MIDDLEBACK RANGE MINING AREA ANNUAL COMPLIANCE REPORT

Annual Compliance Report 2021
(for MPEPR2021/008)
WPC-229

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Document Control

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AUTHORS: Richard Mason, Kelli-Jo Kovac
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Executive Summary

This Annual Compliance Report (ACR) covers the reporting period 1 January 2021 to 31 December 2021 for operations approved under MPEPR2021/008 (SIMEC Mining reference WPC-108 Rev 8, approved 07/05/2021) for the South Middleback Range (SMR) shown in Figure 1. SMR includes the Iron Chieftain, Iron Knight, Iron Duchess, Iron Magnet, and Iron Duke mining pits. This ACR fulfils the reporting requirements of Regulation 77 of the *Mining Regulations 2020*.

Operations within the SMR in the reporting period included hematite and magnetite mining and the associated activities of crushing, screening, and production of magnetite concentrate. Tailings storage facility (TSF) pre-work was undertaken during the period to make way for the TSF raise 8.

During 2021, mining continued in the Iron Magnet and Iron Duchess Pits. The Ore Beneficiation Plant (OBP) ceased operation in late-2021 and low-grade ore (LGO) is no longer processed prior to export. Magnetite ore is crushed and processed through the concentrator and the magnetite product continues to be pumped to the Pellet Plant in Whyalla as a slurry.

Dust management remains a priority and subject to continuous improvement actions.

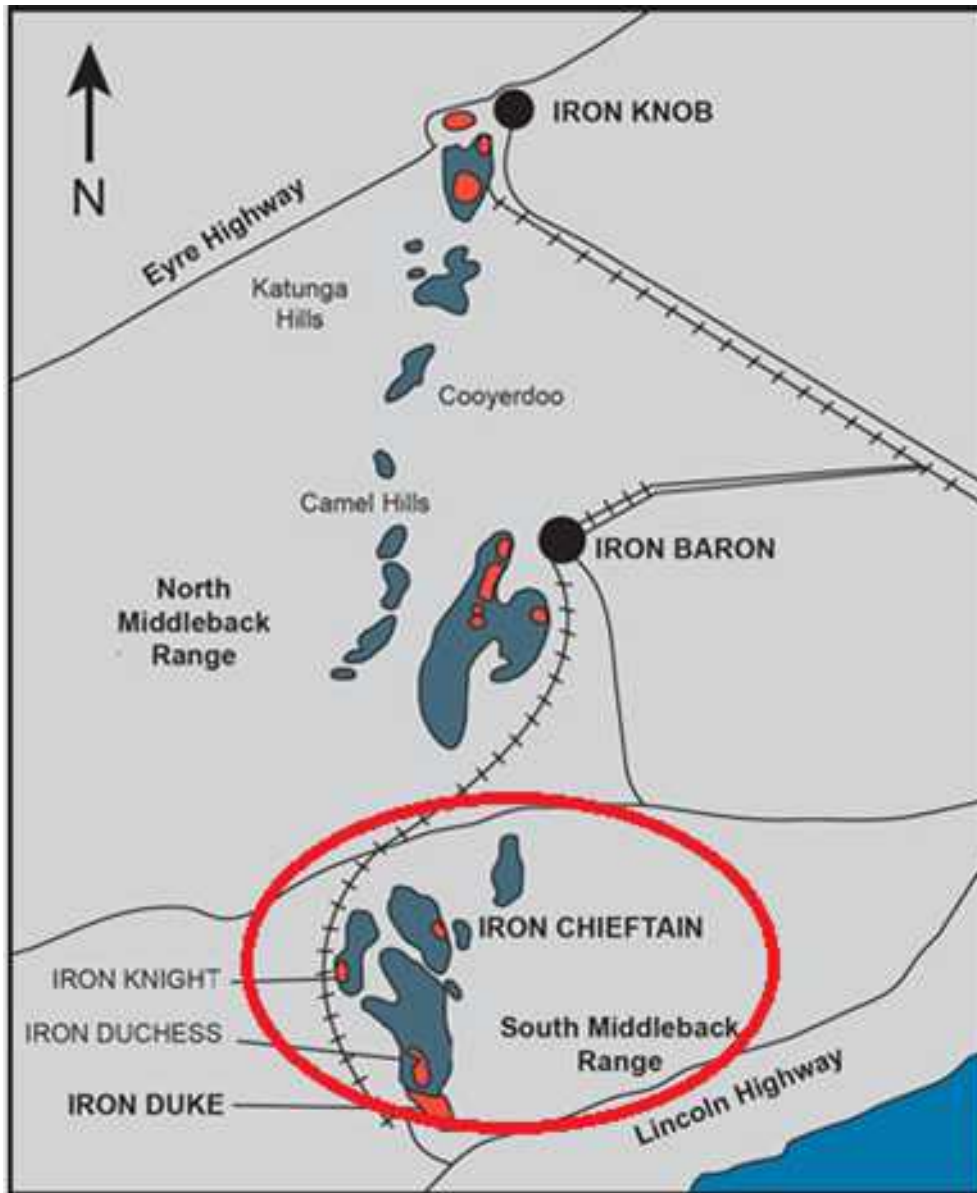


Figure 1 Location of SMR

Determination Terms of Reference 009 Checklist

Section	Included or N/A
1. General Information. Include:	
a. Tenement details	Section 1
b. Name(s) of the tenement holder and mine operator(s)	Section 1
c. Name of the mine operation	Section 1
d. General location details	Section 1
e. Site contact details	Section 1
f. Reference and approved date of relevant PEPR being reported against	Section 1
g. Dates of the reporting period for the report	Section 1
h. Report submission date	Section 1
i. Report author and contact details.	Section 1
2. Tenements	
a. Summary list and the status of currency of all tenements covered by the approved PEPR;	Section 2
b. where the authorised operations extract an amount exceeding 100,000 tonnes per annum or have an estimated rehabilitation liability (as set out in the PEPR/MOP) above \$1,000,000AUD—a plan(s) of the authorised operations showing all tenement boundaries covered by the approved PEPR.	Figure 2, Figure 3, Figure 4
3. Other approvals	
a. Provide a summary list and the status of currency of any other approvals obtained to authorise the mining operation, that are relevant to the achievement of environmental outcomes/objectives within the approved PEPR and or compliance with the tenement conditions.	Section 3
4. Ore reserves and mineral resources. Provide:	
a. A statement of the estimated mine life	Section 4
b. Where the authorised operations extract an amount exceeding 100,000 tonnes per annum or have an estimated rehabilitation liability (as set out in the PEPR) above \$1,000,000AUD:	
i. A statement of the current mineral resource and ore reserve estimates in the tenement area, broken down by individual deposits where possible. Reporting should be compliant with Joint Ore Reserve Committee (JORC) standards or equivalent international codes accepted by the Committee for Mineral Reserves International Reporting Standards (CRIRSCO). Where reporting of mineral resources or ore reserves is provided outside of the scope of these codes, a brief description of the basis of the estimates must be provided (to the satisfaction of DEM), including demonstration that the resource continues to be economically mined at current commodity prices.	Section 4
ii. A statement of any change in the mineral resource and ore reserves from those that form the basis for the mining operation in the approved PEPR; and,	

Section	Included or N/A
<ul style="list-style-type: none"> iii. A summary of any new delineation or exploration drilling activities on the tenement, or any other potential sources of ore (e.g. from nearby mines) that may have a significant effect on the future of production levels and mine life. 	
<p>5. Mining, processing, and waste storage activities. Where the authorised operations extract an amount exceeding 100,000 tonnes per annum or have an estimated rehabilitation liability (as set out in the PEPR/MOP) above \$1,000,000AUD, provide:</p>	
<ul style="list-style-type: none"> a. A summary of the quantity of ore mined and processed in the reporting period, and the expected quantity to be mined and processed in the next reporting period. 	Section 5.1, 5.2, 5.3
<ul style="list-style-type: none"> b. A summary of the quantity of ore currently stockpiled on the tenement, the amount of concentrate or other products exported from the tenement in the reporting period, and the amount expected to be exported in the next reporting period. 	Section 5.1
<ul style="list-style-type: none"> c. A summary of the amount of overburden/waste mined during the reporting period, the amount of overburden/waste to be mined during the next reporting period and the amount of overburden/waste mined since the commencement of authorised operations. 	Section 5.4
<p>6. Compliance with environmental outcomes and leading indicator criteria. Provide:</p>	
<ul style="list-style-type: none"> a. A statement that operations were, or were not, compliant with each environmental outcome (including mine completion outcomes/objectives) specified in the tenement conditions or approved PEPR. The statement must be supported by a summary of measurement criteria data that clearly demonstrates the conclusion that the environmental outcome/objective was (or was not) fully achieved. 	Section 6.1
<ul style="list-style-type: none"> b. Summarise data relating to any leading indicator criteria in the approved PEPR. If any leading indicator criteria have been or will become relevant to the operation of any control strategy, the report must state the actions that were taken and whether the relevant controls strategies continue to be effective. 	Section 6.2
<p>7. Compliance with non-outcome-based tenement conditions. Provide:</p>	
<ul style="list-style-type: none"> a. A statement on the compliance status of any tenement conditions that do not relate to an environmental outcome in the approved PEPR. 	Section 7
<ul style="list-style-type: none"> b. Evidence to support the statement of compliance. 	Table 14
<p>8. Rectification of non-compliances.</p>	
<ul style="list-style-type: none"> a. Where instances of non-compliance have occurred during the current reporting period, provide the following information for each non-compliance (excluding regulation 79(4)(d) leading indicator of the <i>Mining Regulations 2020</i>): <ul style="list-style-type: none"> i. the date of the incident ii. type and description of the reportable incident iii. the date the incident was reported under Regulation 79 of the <i>Mining Regulations 2020</i> or other reporting protocol endorsed by the Government of SA (including the South Australian Uranium Incident Reporting Protocol) iv. the cause of the non-compliance v. any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance 	Section 8

Section	Included or N/A
vi. Where non-compliances under regulation 79 of the <i>Mining Regulations 2020</i> have previously been reported in compliance reports and not fully rectified at the time of reporting, a status update to assess the effectiveness of rectification	
9. Disturbance and rehabilitation activities. Provide a summary of the disturbance and rehabilitation activities, including:	
a. The amount of land disturbed, and activity that created the disturbance, in the reporting period	Section 9
b. Rehabilitation works carried out in the reporting period	Section 9
c. The amount of land where rehabilitation works are completed	Section 9
d. An estimated amount of land to be rehabilitated in the next reporting period	Section 9
e. Strategies implemented to avoid or minimize disturbance	Section 9
f. Any potential improvements learned from previous rehabilitation activities	Section 9
10. Reconciliation of native vegetation clearance. Where the PEPR includes an approved native vegetation management plan (NVMP) for the clearance of native vegetation under the <i>Native Vegetation Act 1991</i> , include:	
a. the approved maximum clearance (as described in the PEPR) in hectares and shown on a plan	Section 10
b. the amount cleared in the reporting period (in hectares and shown on a plan)	Section 10; Figure 6
c. the total amount cleared to date	Section 10
d. an estimated amount to be cleared in the next reporting period.	Section 10
e. provision of information, including annual monitoring and progress reports to demonstrate compliance with the NVMP where the Significant Environmental Benefit (SEB) is being provided by the tenement holder or mine operator by the way of an on-ground SEB offset.	Section 10
11. Environment Protection and Biodiversity Conservation Act 1999 reporting	
a. Where the authorised operations were the subject of an approval under the <i>Commonwealth Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act), include a summary report demonstrating compliance with all EPBC Act approval conditions.	Section 11
12. Exempt land. Provide:	
a. a statement that all waivers for land relevant to the mining operation are in place, and compliant with exempt land provisions, in accordance with Section 9 of the <i>Mining Act 1971</i>	Section 12
b. an update on whether notice has been given to the Mining Registrar that an exempt land agreement has been entered into	Section 12
c. where the authorised operations extract an amount exceeding 100,000 tonnes per annum or have an estimated rehabilitation liability (as set out in the PEPR) above \$1,000,000AUD, provide: <ul style="list-style-type: none"> i. the status of any exempt land, including: <ul style="list-style-type: none"> • name of person entitled to exemption • certificate of title or crown land details • reason for exemption 	Not applicable

Section	Included or N/A
<ul style="list-style-type: none"> • area of exemption (hectares) • date waiver registered • any relevant conditions <p>ii. a plan showing all exempt land relevant to the mining operations. The plan must detail the extent of mining operations at the end of the reporting period</p>	
<p>13. Complaints. Provide a summary of any complaints received during the reporting period. For each complaint provide:</p>	Section 13
<p>a. the date of the complaint</p>	Section 13
<p>b. the nature of the complaint</p>	Section 13
<p>c. whether or not it related to a non-compliance</p>	Section 13
<p>d. what action was taken to address the complaint (or yet to be taken), and</p>	Section 13
<p>e. the date the complaint was resolved</p>	Section 13
<p>14. Management system reviews. Where the authorised operations extract an amount exceeding 100,000 tonnes per annum or have an estimated rehabilitation liability (as set out in the PEPR/MOP) above \$1,000,000AUD, provide a summary of any management system reviews undertaken during the reporting period in order to ensure compliance with relevant tenement conditions and environmental outcomes/objectives (including mine completion outcomes/objectives), including:</p>	Section 14
<p>a. when an audit or review was undertaken</p>	Section 14
<p>b. who undertook the audit or review</p>	Section 14
<p>c. what aspect(s) of the management system was audited or reviewed</p>	Section 14
<p>d. what issues, or recommendations for improvement were noted</p>	Section 14
<p>e. an assessment of any issues identified in the audit or review with the potential to lead to a non-compliance with approved environmental outcomes/objectives, and</p>	Section 14
<p>f. what corrective has been, or will be taken, to address any issues identified</p>	Section 14
<p>15. Verification of uncertainty. Where the authorised operations extract an amount exceeding 100,000 tonnes per annum or have an estimated rehabilitation liability (as set out in the PEPR/MOP) above \$1,000,000AUD, provide:</p>	Section 15
<p>a. a description and status of works undertaken during the reporting period or proposed to be undertaken to address any identified uncertainties or assumptions made in the approved PEPR; and</p>	Section 15
<p>b. a description and status of works undertaken during the reporting period or proposed to be undertaken to address any additional uncertainties or assumptions identified since the PEPR was approved.</p>	Section 15
<p>16. Change to authorised operations and emerging environmental hazards. For the reporting period, provide a summary list of:</p>	
<p>a. any change(s) to authorised operations submitted as a review of a PEPR or submitted as a change notification in accordance with any guidelines published by the department from time to time</p>	Section 16.1
<p>b. any PEPR approvals</p>	Section 16.1
<p>c. any changes to the tenement terms and conditions approved for the reporting period; and</p>	Section 16.1

Section	Included or N/A
d. a description of any new or emerging environmental hazards that apply, or appear to be arising, in relation to authorised operations.	Section 16.2
17. Technical reports.	
a. Provide a summary list of all technical data, studies and reports generated during the reporting period that support the achievement of tenement conditions and environmental outcomes in the approved PEPR.	Section 17
18. Public liability insurance	Section 18

Declaration of Accuracy

SIMEC Mining prepared this document to fulfil the requirement under Regulation 77 of the *Mining Regulations 2020* (Mining Regulations), determining the minimum information required to be provided in a Compliance Report for a holder of a mineral lease and any associated miscellaneous purposes licence under Regulation 77(4)(b) and 77(6)(b) of the *Mining Regulations 2020*.

I, Chris Smyth, OneSteel Manufacturing Pty Limited's Group Manager - Environment, Regulatory and Stakeholder have taken the following steps to review the information in this Annual Compliance Report to ensure its accuracy:

- internal peer reviews by suitably qualified and experienced personnel
- internal process of review by responsible managers

Name	Position or Agent	Signature	Date
Chris Smyth	Group Manager - Environment, Regulatory and Stakeholder		27.09.22

Document Status

Rev No	Authors	Responsible Manager
1	Richard Mason Senior Environmental Advisor	Peter Woods Environment Assurance Manager – Mining Areas
	Kelli-Jo Kovac Environmental Consultant	Chris Smyth Group Manager Environment, Regulatory and Stakeholder

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Abbreviations and definitions

Abbreviation	Definition
DEM	Department for Energy and Mining
DEW	Department for Environment and Water
DEWNR	Department of Environment, Water and Natural Resources
DSD	Department of State Development
IBMA	Iron Baron Mining Area
ILUA	Indigenous Land Use Agreement
LFA	Landscape Function Analysis
LGO	Low Grade Ore
LOM	life of mine
MARP	Mining and Rehabilitation Program
MBR	Middleback Range(s)
ML	Mineral lease
MPL	Miscellaneous purposes licence
OBP	ore beneficiation plant
OMC	outcome measurement criteria
NVMP	Native vegetation management plan
PEPR	Program for Environmental Protection and Rehabilitation
SEB	significant environmental benefit
SMR	South(ern) Middleback Range(s)
TARP	Trigger Action Response Plan
TSF	tailings storage facility
WRD	waste rock dump

Measurements and symbols

Unit	Definition
BCM	bank cubic metres
ha	hectares
Mt	million tonnes

Glossary

bank cubic metre	A measure of volume representing a cubic metre of in-situ rock or material before it is drilled and blasted
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1 General information

Mine name	South Middleback Range (SMR) Iron Chieftain, Iron Knight, Iron Duchess, Iron Magnet, and Iron Duke		
General location	Southern Middleback Range, west of Whyalla on the Eyre Peninsula		
Tenement holder	OneSteel Manufacturing Pty Ltd		
Operating company	SIMEC Mining. Note: SIMEC Mining is a business of OneSteel Manufacturing Pty Limited. Reference to SIMEC Mining (or SIMEC) in this report will be a reference to OneSteel Manufacturing Pty Limited.		
Tenement numbers	ML2648-2654, ML2656-2660, ML2662, ML2663, ML2668, ML2669, ML2677, ML2682, ML2683, ML2701, ML2704-2712, ML4714-2720, ML2729, ML2730, ML4714-4747, ML4761, ML4770-ML4775, ML6055, ML6167, ML6361, ML6362, ML 6441, ML6055, MPL32-34, MPL51-55, MPL67, MPL69, MPL70-74, MPL123 and MPL135		
Program for environment protection and rehabilitation (PEPR)	South Middleback Range Program for Environmental Protection and Rehabilitation	PEPR No.	2021/008
		PEPR approval dated	30 June 2021
Site contact	Name:	Peter Woods – Environment Assurance Manager – Mining Areas	
	Email:	peter.woods@simecgfg.com	
	Phone number	(08) 8640 4149	
Reporting period	From	1 January 2021	To 31 December 2021
Report preparation date	August 2022		
Report authors	Richard Mason and Kelli-Jo Kovac		
Contact details	richard.mason@simecgfg.com		

2 Tenements

Details of existing tenements in the SMR are provided in Table 1. Figure 2 shows the general location of the SMR pits and mining tenement. Figure 3 and Figure 4 show the Mineral Leases (MLs) and Miscellaneous Purpose Licences (MPLs) for Iron Chieftain and Iron Knight. Figure 5 shows the Mineral Leases (MLs) and Miscellaneous Purpose Licences (MPLs) for South SMR Iron Duchess, Iron Magnet, and Iron Duke).

Table 1 SMR tenement summary for the current reporting period

Tenement type	Tenement number	Grant Date	Expiry Date	Status of currency
Miscellaneous Purposes Licences (MPL) – Iron Knight				
MPL	51	15 October 2012	14 October 2033	
MPL	52	15 October 2012	14 October 2033	
MPL	55	15 October 2012	14 October 2033	
MPL	123	12 October 2010	11 October 2025	
Mineral Leases (ML) – Iron Knight				
ML	2657	1 January 1935	30 November 2029	
ML	2663	1 January 1935	30 November 2029	
ML	2704	1 October 1937	30 November 2029	
ML	2717	1 October 1937	30 November 2029	
ML	2718	1 October 1937	30 November 2029	
ML	2719	1 October 1937	30 November 2029	
ML	4735	12 July 1979	11 July 2029	Mining and progressive rehabilitation will continue during 2021 in accordance with PEPR 2021/0603.
ML	4736	12 July 1979	11 July 2029	SIMEC Mining will retain all tenements for the SMR Life of Mine (LOM).
ML	4737	12 July 1979	11 July 2029	Mining and ancillary operations including crushing, screening, rail loading, ore stockpiling, and tailings deposition will continue until ore deposits are fully utilised.
ML	4738	12 July 1979	11 July 2029	
ML	4739	12 July 1979	11 July 2029	
ML	4740	12 July 1979	11 July 2029	
ML	4741	12 July 1979	11 July 2029	
ML	4742	12 July 1979	11 July 2029	
ML	4743	12 July 1979	11 July 2029	Progressive rehabilitation and closure activities will be undertaken as described in approved 2021/0603.
ML	4770	12 July 1979	11 July 2029	
ML	4771	12 July 1979	11 July 2029	
ML	4772	12 July 1979	11 July 2029	A Mine Completion Report will be submitted at least three months prior to Licence relinquishment or expiry.
ML	4773	12 July 1979	11 July 2029	
ML	4774	12 July 1979	11 July 2029	
ML	4775	12 July 1979	11 July 2029	
Mineral Leases (ML) – Iron Chieftain				
ML	2662	1 January 1935	30 November 2029	
ML	2706	1 October 1937	30 November 2029	
ML	4745	12 July 1979	11 July 2029	
ML	4746	12 July 1979	11 July 2029	
ML	4747	12 July 1979	11 July 2029	
ML	6361	12 October 2010	11 October 2025	
ML	6362	12 October 2010	11 October 2025	

Tenement type	Tenement number	Grant Date	Expiry Date	Status of currency
ML	6441	8 December 2014	11 October 2025	
Miscellaneous Purposes Licences (MPL) – Iron Duchess/Magnet/Duke				
MPL	32	15 July 2009	14 July 2030	
MPL	33	15 July 2009	14 July 2030	
MPL	34	15 July 2009	14 July 2030	
MPL	53	15 October 2012	14 October 2033	
MPL	54	15 October 2012	14 October 2033	
MPL	67	22 December 2010	21 December 2031	
MPL	69	23 November 2011	22 November 2032	
MPL	70	23 November 2011	22 November 2032	
MPL	71	23 November 2011	22 November 2032	
MPL	72	23 November 2011	22 November 2032	
MPL	73	23 November 2011	22 November 2032	
MPL	74	23 November 2011	22 November 2032	
MPL	135	1 September 2011	11 July 2029	
Mineral Leases (ML) – Iron Duchess/Magnet/Duke				
ML	2648	1 October 1934	30 November 2029	
ML	2649	1 October 1934	30 November 2029	
ML	2650	1 October 1934	30 November 2029	
ML	2651	1 October 1934	30 November 2029	
ML	2652	1 October 1934	30 November 2029	
ML	2653	1 October 1934	30 November 2029	
ML	2654	1 October 1934	30 November 2029	
ML	2656	1 January 1935	30 November 2029	
ML	2658	1 January 1935	30 November 2029	
ML	2659	1 January 1935	30 November 2029	
ML	2668	1 January 1936	30 November 2029	
ML	2669	1 January 1936	30 November 2029	
ML	2677	1 October 1937	30 November 2029	
ML	2682	1 October 1937	30 November 2029	
ML	2683	1 October 1937	30 November 2029	
ML	2701	1 October 1937	30 November 2029	
ML	2705	1 October 1937	30 November 2029	
ML	2707	1 October 1937	30 November 2029	
ML	2708	1 October 1937	30 November 2029	
ML	2709	1 October 1937	30 November 2029	
ML	2710	1 October 1937	30 November 2029	
ML	2711	1 October 1937	30 November 2029	
ML	2712	1 October 1937	30 November 2029	
ML	2714	1 October 1937	30 November 2029	
ML	2715	1 October 1937	30 November 2029	
ML	2716	1 October 1937	30 November 2029	
ML	2720	1 October 1937	30 November 2029	
ML	4714	12 July 1979	11 July 2029	
ML	4715	12 July 1979	11 July 2029	

Tenement type	Tenement number	Grant Date	Expiry Date	Status of currency
ML	4716	12 July 1979	11 July 2029	
ML	4717	12 July 1979	11 July 2029	
ML	4718	12 July 1979	11 July 2029	
ML	4719	12 July 1979	11 July 2029	
ML	4720	12 July 1979	11 July 2029	
ML	4721	12 July 1979	11 July 2029	
ML	4722	12 July 1979	11 July 2029	
ML	4723	12 July 1979	11 July 2029	
ML	4724	12 July 1979	11 July 2029	
ML	4725	12 July 1979	11 July 2029	
ML	4726	12 July 1979	11 July 2029	
ML	4727	12 July 1979	11 July 2029	
ML	4728	12 July 1979	11 July 2029	
ML	4729	12 July 1979	11 July 2029	
ML	4730	12 July 1979	11 July 2029	
ML	4731	12 July 1979	11 July 2029	
ML	4732	12 July 1979	11 July 2029	
ML	4733	12 July 1979	11 July 2029	
ML	4734	12 July 1979	11 July 2029	
ML	4744	12 July 1979	11 July 2029	
ML	4761	12 July 1979	11 July 2029	
ML	6055	8 September 2013	7 September 2034	
ML	6167	23 November 2011	22 November 2032	

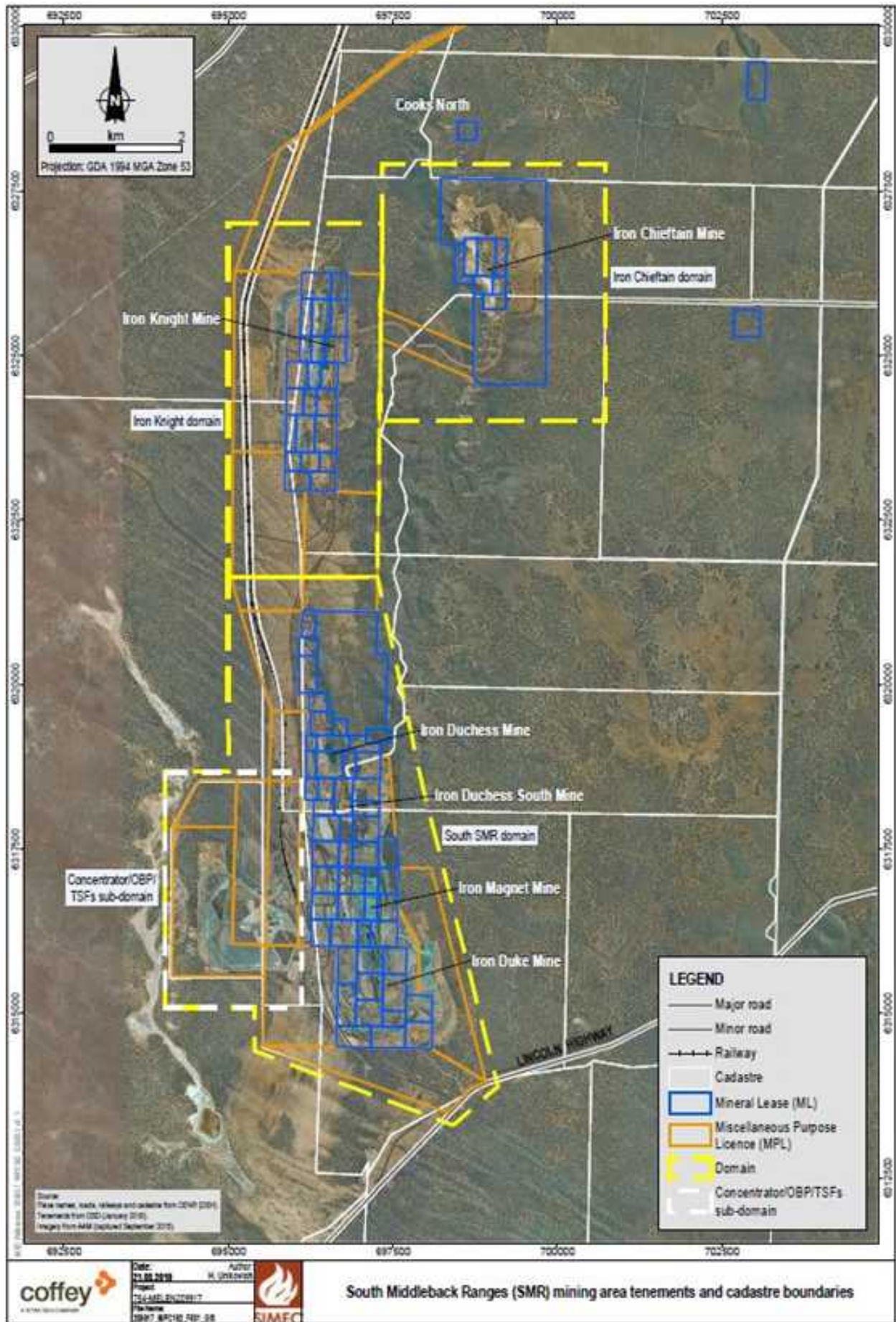


Figure 2 SMR mine layout overview

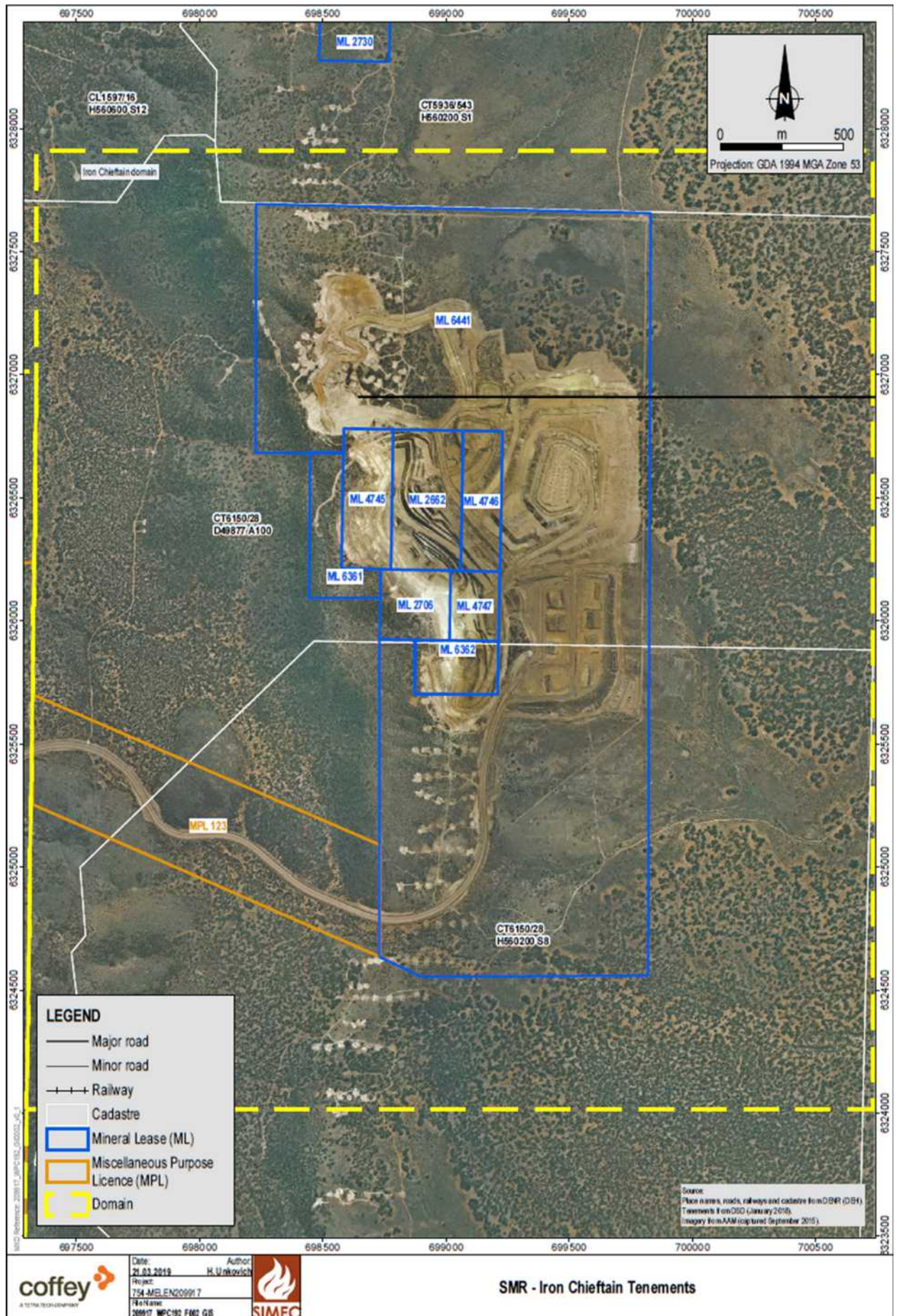


Figure 3 SMR – Iron Chieftain tenements and cadastre boundaries

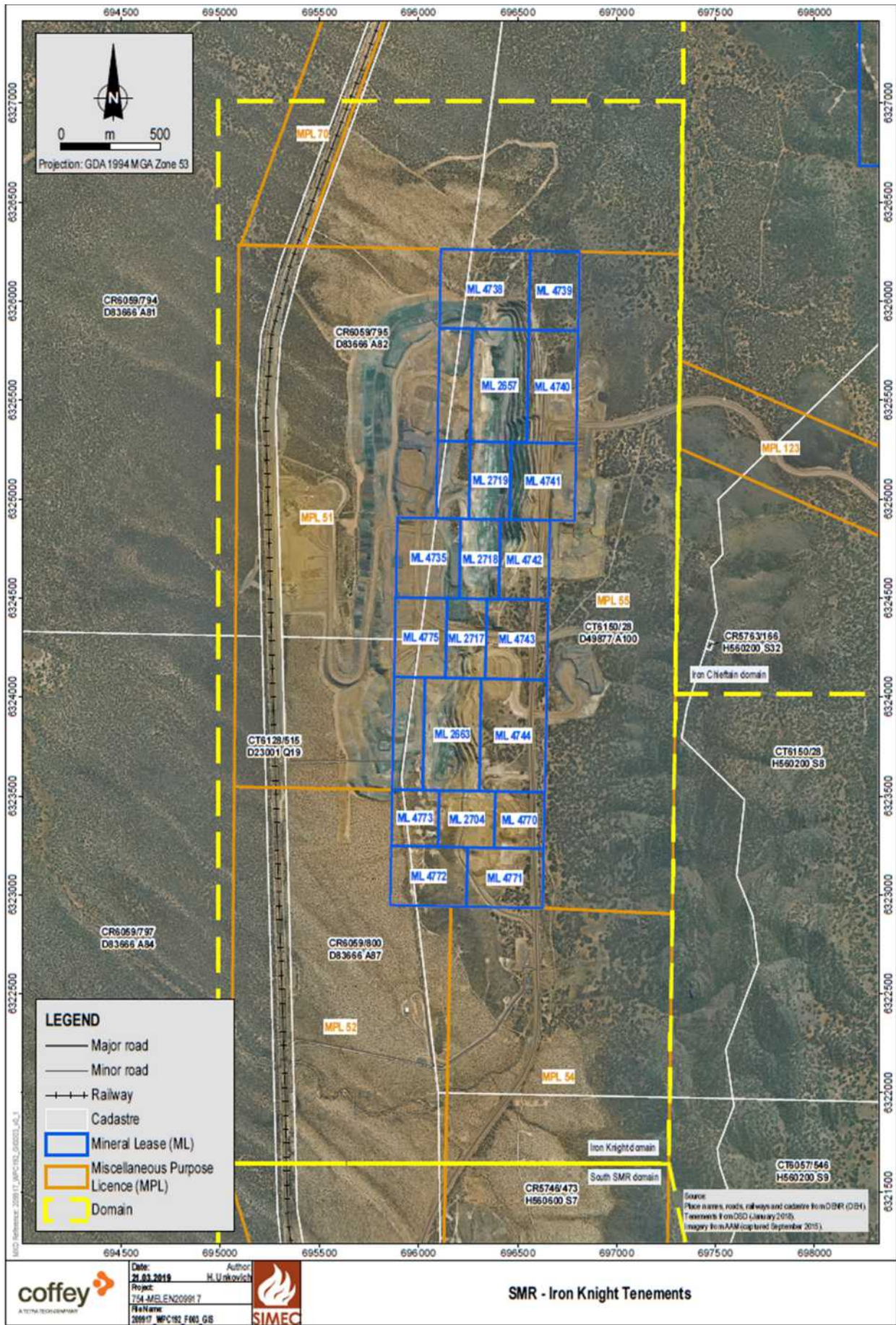


Figure 4 SMR – Iron Knight tenements and cadastre boundaries

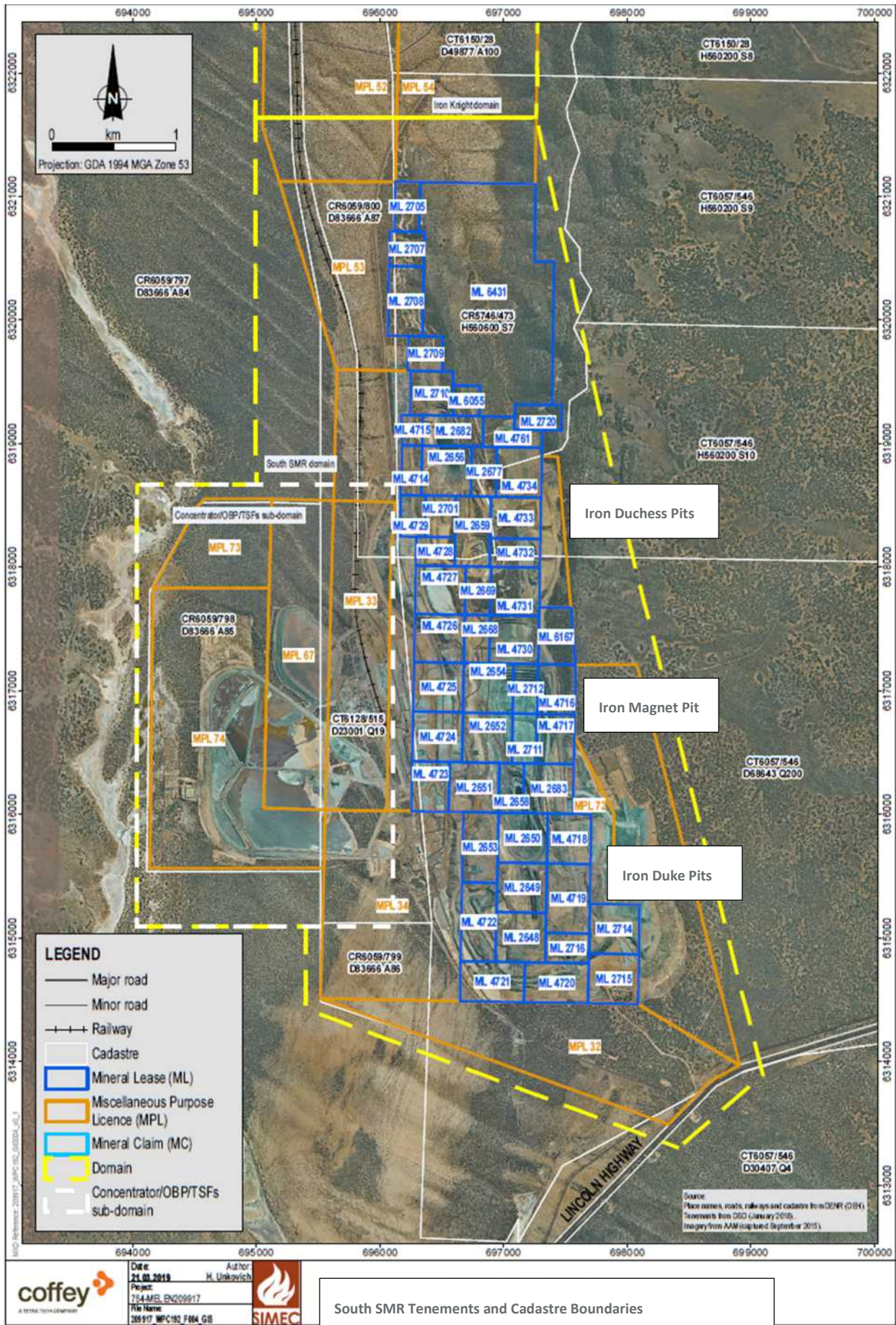


Figure 5 SMR –South SMR (Iron Duke, Magnet and Duchess Pits) tenements and cadastre boundaries

3 Other approvals

Table 2 provides details of additional agreements and licences held for the SMR.

Table 2 Agreement and licences – SMR

Licence, permit or agreement	Regulatory authority or other	Supporting documents	Associated ML, MPL, ML lease condition or outcome measurement criteria
Middleback Ranges SA ILUA:SI2013/002	National Native Title Tribunal	Extract from Register of Indigenous Land Use Agreements	Aboriginal heritage
EPA Licence 17122 (Mineral works)	Environment Protection Authority	Licence held at SIMEC's Environment Assurance Office and copies at work sites	Mineral works
EPA Licence 13109 (Railway Operations)	Environment Protection Authority	Licence held at SIMEC's Environment Assurance Office and copies at work sites	Air quality
DEW (formerly DEWNR) Water Affecting Activity Permit SAAL00005	South Australian Arid Lands Natural Resources Management Board	Permit held at SIMEC's Environment Assurance Office	Stormwater
DEW Water Affecting Activity Permit No. 379747 (Expiry 14/10/2023)	Department for Environment and Water	Permit held at SIMEC's Environment Assurance Office	Stormwater

4 Ore reserves and mineral resources

4.1 Ore reserves and mine life

The estimated mine life for the SMR is currently estimated to be 10 years.

Details of ore reserves and estimated mine life as at the end of December 2021 are provided below for the various pits that comprise the SMR mining area. In 2021 SIMEC reassessed the resource and reserve estimates shown in the following tables using the JORC or JORC-equivalent reporting process. Table 3, Table 4, Table 5 and Table 6 provide details of the total resources and ore reserves, scree totals and low-grade ore (LGO) totals for SMR including any changes between the 2016 JORC and 2021 JORC totals.

4.1.1 Iron Chieftain resource

No mining occurred during the reporting period. No mining occurred during the period.

Table 3 shows the current known reserve and resource in the Iron Chieftain resource area. No mining occurred during the period.

Table 3 Iron Chieftain – total resource and reserve (Fe>47%)

Ore reserves	Mass (Mt)	Mineral Resources	Mass (Mt)	Estimated mine life (years)
Proved	-	Measured		0.25
Probable	0.08	Indicated	1.24	
		Inferred	0	
Total	0.08		1.24	
PEPR	9.5		34.36	
Change	-9.42		-33.1	

4.1.2 Iron Knight

Table 4 shows the current known reserve and resource in the Iron Knight area, and the changes in both compared with the reserves and resources shown in PEPR2021/0603. Mining at Iron Knight did not occur over 2021.

Table 4 Iron Knight – total resource and reserve (Fe >47%)

Ore reserves	Mass (Mt)	Mineral resources	Mass (Mt)	Estimated mine life (Years)
Proved	-	Measured		0.0
Probable	0.0	Indicated	0	
		Inferred	0	
Total	0.0		0	
PEPR	1.41		6.24	
Change	-1.41		-6.24	

4.1.3 Iron Duchess

Table 5 shows the current known and resource in the Iron Duchess Mining area, and the changes in both compared with the reserves and resources shown in PEPR2020/0603. Duchess North was mined during 2021.

Table 5 Iron Duchess – total resource and reserve

Ore reserves	Mass (Mt)	Mineral resources	Mass (Mt)	Estimated mine life (Years)
Iron Duchess North				
Proved	2.6	Measured	0	5
Probable	5.8	Indicated	21.9	
		Inferred	13.1	
Total	8.4		35.0	
PEPR	-		34.94	
Change	+8.4		+0.06	
Iron Duchess South				
Proved	-	Measured	-	0
Probable	0	Indicated	0	
		Inferred	0	
Total	0		0	
PEPR	1.32		2.67	
Change	-1.32		-2.67	

4.1.4 Iron Duke / Iron Magnet

Table 6 shows the current known reserves and resources (sourced from the JORC or JORC equivalent process) in the Iron Duke/Magnet Mining area, and the changes in both compared with the reserves and resources shown in PEPR2020/0603. Mining was undertaken in Iron Magnet in 2021.

Table 6 Iron Duke/Iron Magnet – total resource and reserve

Ore reserves	Mass (Mt)	Mineral resources	Mass (Mt)	Estimated mine life (Years)
Proved	31.6	Measured	25	10 (until 2032)
Probable	27.1	Indicated	175	
		Inferred	245	
Total	58.7		445	
PEPR	62.4		182.9	
Change	-3.7		+262.0	

4.2 Exploration and other ore sources

Exploration drilling activities occurred on the SMR tenements during the period, with 60 holes drilled by exploration rigs at the Duchess and Iron Magnet Pits. Appendix B provides details of the relevant boreholes Drilled. No other potential sources of ore were identified during the period that could have a significant effect on the future production levels and mine life.

5 Mining, processing, and waste storage activities

5.1 Ore mining

Table 7 shows the volumes of ore mined at the SMR. It also includes ore forecast to be mined during the next reporting period and the total of ore stockpiled at the end of the reporting period.

*SMR Ore mined includes both hematite DSO and Magnetite mined.

Table 8 shows ore stockpile volumes for different types of ore as of December 2021.

Table 7 SMR ore mined in the reporting period and forecast for next reporting period

Ore mined Mine life (2011 – 2020) (BCM)	Reporting period Ore mined (BCM)	Next reporting period Ore to be mined (BCM)
18,941,074	1,949,944*	2,156,724
Reason(s) for variations from previous reports	Ongoing assessment of SIMEC resource and reserve estimates.	

*SMR Ore mined includes both hematite DSO and Magnetite mined.

Table 8 Iron Duke/Knight/Magnet stockpiles as of 31 December 2021

Whyalla blend ore (t)	OBP (t)	Magnetite (t)
47,581	Nil	4,795,085

5.2 Ore processing

Table 9 shows the ore tonnages processed for LOM, in the reporting period as expected in the next reporting period.

Table 9 Ore crushed at SMR

Domain	Ore processed Mine life (t)	Reporting period Ore processed (t)
Iron Duke	Not available due to constraints related to obtaining accurate data from commencement of mining	6,793,221
Iron Knight	Not available due to constraints related to obtaining accurate data from commencement of mining	1,109,958*
Iron Duchess	0	0
Iron Magnet	0	0
Total		7,903,179

*Includes Lucas auxiliary crushing of LGO Materials

5.3 Concentrate

Table 10 shows the concentrate tonnages processed at SMR in the reporting period, and the total processed to the end of the reporting period.

Table 10 Concentrate exports from the SMR in the reporting period

Concentrate exported mine life (t)	Reporting period Concentrate exported (t)		Next reporting period Concentrate to be exported (t)
18,422,204 (2011-December 2021)	Concentrator	2,145,029	2,200,000
Total		2,145,029	
Reason(s) for variations from previous reports	No OBP processed in 2021.		

5.4 Overburden / waste

Table 11 shows the volumes of overburden excavated in the reporting period, and total to date.

Table 11 Overburden mined in the SMR in the reporting period

Overburden mined Mine life (2011-2019) (tonnes)	Reporting period Overburden mined (tonnes)	Next reporting period Overburden to be mined (tonnes)
82,709,361	18,849,761	10,317,656
Reason(s) for variations from previous reports	Ongoing assessment of SIMEC resource and reserve estimates.	

6 Compliance with environmental outcomes/objectives and leading indicator criteria

6.1 Compliance with outcomes

Table12 is an overview of SMR compliance against outcomes and associated measurement criteria.

Table12 Compliance with Environmental Outcomes

Outcome	Outcome measurement criteria (OMC)	Compliance status	Compliance Statement	Evidence	Forward work plan
Native Vegetation					
No permanent loss of abundance or diversity to native vegetation through clearance, dust/contaminant deposition, fire or other damage caused by mining operations on or off the tenements, unless prior approval under legislation is obtained	Annual aerial and/or ground surveys at operational areas demonstrates that the total area cleared does not exceed the approved area.	Compliant	Annual aerial and/or ground surveys of operational areas demonstrated that the total area cleared did not exceed the approved areas as defined in MPEPR 2021/008. Ground Survey plus vegetation clearance permit data to the 31 December 2021 (see Section 11 and Section 12 Table 17), of this document. During 2021, 434 goats were removed from the SMR mining operational areas.	Annual aerial surveys. Ground surveys and mapping. SIMEC tracking of vegetation clearance and rehabilitation.	Implement improved internal procedure QP50.65 "Vegetation Clearance". Ensure compliance with vegetation and rehabilitation obligations. Continue mustering and removing goats across SMR, to reduce the likelihood of overgrazing impacts on native vegetation.
No vegetation health impacts to neighbouring properties from dust generated by mining activities	Quarterly internal assessment and annual vegetation dust impact assessment report by external consultant at the vegetation monitoring quadrats (see PEPR 2021/0603 Appendix A-9).	Non-compliant (due to timing of surveys).	No significant vegetation health impacts to neighbouring properties from dust generated by mining activities were recorded in the period. Quarterly/annual vegetation dust impact assessments were completed however inspections were technically non-compliant due to timing constraints as a result of COVID-19 and operational issues.	During 2021 SIMEC completed internal vegetation dust impact surveys in March, July, and September. Due to Covid-19 and operational issues the 2021 external survey was delayed. It was undertaken by EBS Ecology in February 2022 (EBS 2022). As it was not conducted in the calendar year this represents a technical non-compliance. To improve ongoing future monitoring and scheduling a review of the vegetation dust impact survey methodology was completed. All three SIMEC surveys observed a compliant dust score at all 3 mine locations with all three SIMEC surveys showing similar results. EBS also undertook a vegetation dust impact assessment across all previous years and made recommendations for future recording.	Regular observation assessment and improvement opportunities identified and implemented.
Native Fauna					
That there is no permanent loss of native fauna abundance caused by mining operations	Inspections and operational process audits ongoing throughout operation and closure and rehabilitation.	Compliant	Inspections and audits demonstrate that drill collars are capped immediately following exploration activities.	No incidents of uncapped drill collars were recorded within the reporting period.	Continue to monitor and improve inspections for Fauna.

Weeds, Pests, and Pathogens					
No introduction of new species of weeds, nor a sustained increase in abundance of existing weed species in the Licence area, compared to adjoining land	Biannual weed inspection reports and continuous weed mapping demonstrate that new weeds and existing weeds are managed by control measures as per the SIMEC Mining Pest Plant and Animal Control Strategy QP50_62 within six months of documenting the presence of new weed incursions or increase in abundance of existing weeds in the licence area compared to baseline flora and fauna surveys (Bebbington 2009 and 2014)	Compliant	Biannual weed inspections over SMR demonstrated that no new weed and pest incursions When required, incident responses to observed weeds and the success of weed control by tracking implementation of QP50_62 and achieving close out within six months	No new weed incursions or increases in abundance of existing weeds were recorded during weed inspections. Goat grazing continues to impact rehabilitation efforts. 434 goats were removed from SMR in 2021.	Continue to monitor compliance with the Pest Plant and Animal Control Strategy QP50_62
Soils					
Topsoil quality and quantity is maintained	Six-monthly inspection audits demonstrate that topsoil has been stripped, stockpiled (see Figure 56 of PEPR 2021/0603) and maintained in accordance with SIMEC Mining's Soil Management Plan (QP50_66) and that all corrective actions from audits logged and closed out within 60 days or as otherwise agreed with the Regulator	Compliant	Six-monthly inspection of topsoil stockpiles demonstrate that topsoil has been stripped, stockpiled, and maintained in accordance with SIMEC Mining's Soil Management Plan (QP50_66) and that all corrective actions from audits are recorded and closed out within 60 days or as otherwise agreed with the Regulator	Topsoil inspections confirmed that topsoil had been maintained in accordance with QP50.66. No evidence of unauthorised disturbance, all stockpiles are the correct height, free from erosion and signage in place. Two topsoil stockpile inspections were undertaken in 2021, one in each of May and another in October. No corrective actions were required.	Continue to monitor Topsoil stockpiles.
Surface water					
No water contaminated as a result of mining operations leaves the tenement areas or results in loss of, or contamination of, soil on, or off, the tenement/s	Records demonstrate that inspection audits of drainage silt traps (see location plan PEPR 2021/0603, Appendix A-10) are carried out within five days of rainfall events that result in flows of stormwater, or every three months, whichever is the lesser, to determine that culverts are not blocked and that >500 mm of freeboard remains in silt traps and that spillways are not eroded or otherwise damaged, and that all corrective actions from	Compliant	No staining or erosion in drainage channels was detected outside of operational areas to an extent greater than that existing prior to commencement of operations	Storm water inspection audits were completed. No areas of concern identified. All silt traps have adequate freeboard. Good evidence of sediment capture and no major erosion. Maintenance of silt traps was observed and noted to be adequate	Continue to monitor Stormwater infrastructure.

	inspections are logged and closed out within 30 days or as otherwise agreed with the Regulator				
Groundwater					
No changes to groundwater levels that adversely impact vegetation due to Magnetite TSF operations	Records and reports demonstrate that SIMEC Mining is compliant with the Magnetite TSF Management Plan, and that the ground water extraction wells are functioning (refer to PEPR2020/0603 Section 3.9.6) and that monthly groundwater level monitoring at location plan (see PEPR2020/0603 Figure 23), demonstrates a falling trend in groundwater levels to below the vegetation root zone, averaged over a twelve month period and taking into account rainfall events that may naturally raise groundwater levels temporarily. Biannual aerial and ground surveys demonstrate that the TSF vegetation impact area has not increased.	Compliant	TSF vegetation impact monitoring inspections were undertaken. No adverse vegetation impact recorded during the period.	Groundwater levels in bores to the west of the TSF had generally stable and downwards-trending groundwater levels in 2021. Significant rainfall events continue to temporarily elevate groundwater levels in the bores. Below ground level target in 2021. The BHMB series monitoring bores located immediately west of the TSF also showed groundwater level fluctuation in response to significant rainfall events as well.	Continue to monitor compliance of Groundwater Bores. Further Bores to be added at the TSF in 2022.
No changes to groundwater levels that adversely impact vegetation due to Iron Duchess water storage operations	Monthly groundwater monitoring records demonstrate that the groundwater level does not exceed 160m AHD at DMW03 (see Figure 25 PEPR2020/0603)	Compliant	Monthly Groundwater monitoring was undertaken. No adverse rises were recorded during the period.	Monthly ground water levels at DMW3 continued to rise in 2021, consistent with 2020 monitoring observations. From the last reading in November 2020 (148.03 mRL) to January 2021 groundwater rose 0.43m to 148.46mRL. This was the last read before this bore was decommissioned and replaced with DMW04.	Groundwater level trends will continue to be reviewed on a monthly basis
	Annual aerial and/or ground surveys demonstrate that the total area of vegetation cleared does not exceed the approved area as per PEPR 2021/0603, Table 361 (see Section 4.3) when compared to the September 2013 aerial image (see Figure 72; PEPR2020/0603)	Compliant	TSF vegetation impact monitoring inspections were undertaken. No adverse vegetation impact recorded during the period.	Annual vegetation clearing evidence is presented in Section 10 below. Vegetation clearance in 2021 was less than the approved area as per PEPR 2021/0603.	Continue to monitor and improve vegetation clearance and rehab tracking in 2022.

Air Quality					
No nuisance impacts to local residents and the general public from air emissions, dust and odour generated from mining operations	Records demonstrate that complaints of emissions, dust or odour are responded to within 24 hours, are logged and investigated and all corrective actions are closed out within 30 days of receiving a complaint, or as otherwise agreed with the affected party or the Regulator	Compliant	Records demonstrate that complaints of emissions, dust or odour were compliant for the period.	There is an ongoing historical concern related to air quality from a landholder located approximately 8km to the south of Iron Duke that has been the subject of extensive monitoring and assessment. To date, an Impact has not been able to be established. Ongoing monitoring and adherence to onsite controls and automation remain a focus.	Continued focus on dust control and ongoing preparedness to investigate any dust related concerns. Continue to implement Dust TARP (QP50.84 R0) at all SIMEC Whyalla Sites. Installation of automated dust monitoring at SMR is a focus for 2022.
Visual Amenity					
The contrasting and reflective aspects of WRDs and infrastructure are visually softened to blend in with the surrounding landscape	Annual audits against the staged rehabilitation strategy, with the use of annual aerial and ground surveys of the landform development and biennial flora monitoring surveys demonstrate progressive rehabilitation undertaken in accordance with staged rehabilitation strategy for the SMR Mining Area (see PEPR Section 8)	Compliant	Timing and rehabilitation outcomes were achieved in accordance with the Mine Closure and Rehabilitation Plan.	Rehabilitation continued at Iron Duke, Iron Duchess, and Iron Knight (see Figure 6, Figure 7, and Table 17).	Continue to progressively rehabilitate in accordance with PEPR2020/0603
Blasting and Vibration					
No public health, safety and nuisance impacts from air blast overpressure, vibrations, fumes, dust or fly rock caused by blasting undertaken on site	Records show that an independent investigation of recorded incidents related to blasting activities on site, demonstrates that an incident could not have been prevented through implementation and use of reasonable preventative measures and that all incidents as a result of blasting, including fly rock occurrences outside of the blast management zone, or complaints related to blasting are investigated and corrective actions closed out within 30 days or as otherwise agreed with the Regulator	Compliant	Records show no incidents relating to blasting activities occurred during the period as a result of blasting, including fly rock found outside of the blast management zone, or complaints related to blasting.	No incidents were recorded. No complaints of damage were received. No fly rock was found outside of blast management zone.	NA

Public Safety					
No accidents involving the public as a result of exploration and mining activities that could have been reasonably prevented by SIMEC Mining	Records show that an independent investigation of recorded injuries from unauthorised access to the site, demonstrates that an incident could not have been prevented through implementation of reasonable preventative measures and that 100% of incidences of unauthorised access are investigated and corrective actions closed out within 30 days or as otherwise agreed with the Regulator	Compliant	No incidents or accidents resulting from SMR operational traffic or SMR road/rail traffic that could have been prevented by reasonable preventative measures were recorded during the reporting period.	No incidents or injuries were recorded or reported in 2021.	N/A
Adjacent Land Use and Third-Party Property					
No unauthorised damage to adjacent property or infrastructure from mining operations	Records demonstrate that complaints of unauthorised damage are responded to within 24 hours, are logged and investigated and all corrective actions are closed out within 30 days of receiving a complaint, or as otherwise agreed with the affected party or the Regulator	Compliant	No damage to adjacent property or infrastructure was recorded during the reporting period.	No complaints were received in 2021.	Continuous observation, assessment and improvement of dust control systems and procedures.
Heritage					
No disturbance to Aboriginal artefacts, sites of significance or European heritage unless prior approval under the relevant legislation is obtained	Records demonstrate that discoveries of suspected Aboriginal or European artefacts or remains were left without further disturbance, reported to the authorities, and investigated and that work recommenced only after being authorised by the appropriate authority	Compliant	No incidents of discoveries of suspected Aboriginal or European artefacts or remains were recorded during the reporting period.	No incidents of discoveries of suspected Aboriginal or European artefacts or remains were recorded during the reporting period	NA
Road Safety					
No incidents or accidents resulting from road accidents associated with the SMR operational or access traffic that could	Records of independent investigation of all recorded incidents and accidents involving SMR operational traffic, or SMR access road/public road interface traffic demonstrates that the	Compliant	No injuries to members of the public that could have been reasonably prevented were recorded during the reporting period.	No injuries to members of the public that could have been reasonably prevented were recorded during the reporting period.	N/A

have been reasonably prevented	incident could not have been prevented through implementation of reasonable preventative measures and that 100% of incidences of unauthorised access are investigated and corrective actions closed out within 30 days or as otherwise agreed with the Regulator				
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Visual Amenity

Integrate and harmonise final landforms and vegetation with surrounding landscape	Annual Progressive Rehabilitation Compliance Audit and final landform profile and revegetation audit demonstrates WRDs are constructed and remediated to integrate and harmonise the final landform and vegetation with the surrounding landscape as each lift is completed in accordance with the design, closure and rehabilitation strategy described in Section 8 (PEPR2020/0603)	Compliant	Timing and rehabilitation outcomes were achieved in accordance with the Mine Closure and Rehabilitation Plan	Mine Closure and Rehabilitation Plan Tracking and inspection of Rehabilitation	Continue to progressively rehabilitate in accordance with PEPR2020/060 nd Mi3
	Final landform profile and revegetation audit via ground and flora survey demonstrates that all constructed haul roads and open areas are remediated in accordance the design, closure and rehabilitation strategy described in Section 8 (PEPR2020/0603)	Not applicable until mine closure	N/A	N/A	N/A
Re-establishment of mine site ecosystem and landscape function	Annual assessment by internal specialist or external consultant and a final report from a suitably qualified person confirms that Landscape Function Analysis (LFA) indicates that LFA curve has moved above, or is likely to move above the critical threshold of sustainability, which, depending on specific site variables are within the following ranges (stability index; 45-55%,	Compliant	SIMEC Mining use annual Landscape Function Analysis (LFA) to measure the success of rehabilitation and to guide improvements to rehabilitation methods. At this stage, this monitoring is long term and ongoing and no improvements were identified during the reporting period. Any identified improvements will be reported on in future. SIMEC Mining has also undertaken a review of rehabilitation inspection and	Baseline LFA data was collected in December 2013. Follow-up LFA data is collected annually. SIMEC collected LFA data in November 2021 and undertook an external review of LFA.	Continue to collect LFA data annually

	Infiltration index; 30-33%, Nutrient cycling index, 23-28%), on remediated WRDs, haul roads and operational and fixed plant areas. This criterion to remain open until the target is met		survey methodologies leading to improvements in recording and monitoring rehabilitation at SIMEC Mining sites.		
Mine Closure					
Risk to health and safety of the public and fauna are as low as reasonably practical	The completion safety audit demonstrates that WRDs, quarry pit and operational areas are constructed and remediated and that the safety bunds are 10 m outside of the potentially unstable pit edge zone (see Figures 85, 88, 93 and 94), and that, fencing and signage are in place in accordance with the design, closure and rehabilitation strategy described in Section 8. Fencing and signage will be maintained by SIMEC Mining until such time that it is agreed between SIMEC Mining and DSD that SIMEC Mining is no longer responsible for the maintenance	Not applicable until mine closure	Not applicable until mine closure	N/A	N/A
The site is physically stable	Annual and final landform profile compliance audits demonstrate WRDs, pits, and infrastructure areas are constructed and remediated in accordance with design, closure and rehabilitation strategy set out in Section 8 (PEPR2020/0603)	Compliant	Not applicable until mine closure	All internal compliance and EMS audits were completed as scheduled.	Continue to construct and remediate in accordance with design, closure, and rehabilitation strategy
The site will be rehabilitated to a stable condition that supports a resilient, self-sustaining natural ecosystem suitable for the post-mining land use that will be determined in consultation with relevant stakeholders	Site audit at mine closure by an independent professional to demonstrate that the site is rehabilitated as per the closure domain objectives (see Section 8 (PEPR2020/0603)	Not applicable until mine closure	Not applicable until mine closure	N/A	N/A

All infrastructure is removed from the site prior to mine completion	Final closure and divestment audit report demonstrates that all fixed mine infrastructure is demolished disposed of or removed from site within two years of mine closure	Not applicable until mine closure	Not applicable until mine closure	N/A	N/A
All equipment is removed from site prior to mine closure	Final closure and divestment audit report demonstrates that all mobile machinery and equipment is removed from site within 12 months (or as otherwise agreed with DSD) of completion of rehabilitation of all WRDs, haul roads and impacted areas	Not applicable until mine closure	Not applicable until mine closure	N/A	N/A
All mine waste materials left on site are chemically and physically stable	At mine closure records demonstrate all industrial and domestic wastes are disposed of in accordance with the Environment Protection Act 1993, and that all waste mine materials left on site are chemically and physically stable as determined by a site contamination audit conducted by an independent and qualified auditor	Not applicable until mine closure	Not applicable until mine closure	N/A	N/A

6.2 Leading indicator criteria

SMR has 11 Leading indicator criteria under MPEPR2021/008, during the period eight leading indicator criteria were relevant to the operation of a control strategy at SMR's TSF. Table 13 below outlines the leading indicator criteria, the actions that were taken and the relevant controls strategies that were utilised.

Table 13 Summary of leading indicator criteria during the reporting period

Reference	Date	Location	Type	Actions and Control strategies
LIN-SMR-2021-01	6/01/2021	SMR-TSF	TSF bh <1.5m	Monthly Groundwater monitoring was undertaken in the period. Groundwater measurements taken in January 2021 confirmed the previously notified (monthly TSF reports during 2020) information that MB1 and MB2 trigger the Leading Indicator, with depths below surface of 1.33 m and 1.17 m respectively. Follow up surveys indicated these wells have shown a falling trend (i.e. improvement compared to the Leading Indicator) since the end of October 2020. TSF rise recorded during the period. Ongoing monitoring and reporting of TSF borehole fluctuations.
LIN-SMR-2021-02	17/02/2021	SMR-TSF	TSF piezo rise	Monthly Groundwater monitoring was undertaken in the period. TSF Piezo rise was recorded during the period and reported accordingly. A VWP malfunction was detected in follow up. Ongoing monitoring and reporting of TSF piezo rise.
LIN-SMR-2021-03	1/04/2021	SMR-TSF	TSF cracking	Monthly inspection to detect cracking at TSF was undertaken. Minor longitudinal cracks in the outer surface of the TSF in the western embankment, near the north-west corner were recorded during the period. Golder advised that they did not have immediate concerns with the stability of the TSF and provided a 2-week monitoring scheme that SIMEC undertook. Ongoing monitoring and reporting of TSF cracking.
LIN-SMR-2021-04	11/05/2021	SMR-TSF	TSF piezo rise	Monthly Groundwater monitoring was undertaken in the period. TSF Piezo rise was recorded during the period and reported accordingly. A VWP malfunction was detected in follow up. Ongoing monitoring and reporting of TSF piezo rise.
LIN-SMR-2021-05	27/05/2021	SMR-TSF	Seepage expansion	Monthly Groundwater monitoring was undertaken in the period. Seepage expansion was monitored in compliance with PEPR requirements. An existing known seepage area near the SW corner of the TSF on the Roo Road became more apparent in the period. Golder was notified, and there were no stability concerns identified. Ongoing monitoring and reporting of TSF Seepage areas was undertaken during the period and is ongoing.
LIN-SMR-2021-06	17/08/2021	SMR-TSF	TSF bh <1.0m	Monthly Groundwater monitoring was undertaken in the period. TSF rise recorded during the period. Ongoing monitoring and reporting of TSF borehole fluctuations.
LIN-SMR-2021-07	01/11/2021	SMR-TSF	TSF piezo rise	Monthly Groundwater monitoring was undertaken in the period. TSF Piezo rise was recorded during the period and reported accordingly. Piezometer measurements in October/November 2021 at Vibrating Wire Piezometer SMR_14_VWP_CV14_PP in the central west of the TSF triggered the Leading Indicator, with a rise of 1 m or more in a month. This was the only Vibrating Wire Piezometer the show this anomalous behaviour at that time. It does not encroach on the alert zone for absolute value provided by Golder referring to the TARP. Golders were contacted for advice and advised it is likely to be anomalous behaviour, as the trend is not shown in other piezometers. Ongoing monitoring and reporting of TSF piezo rise.
LIN-SMR-2021-08	15/11/2021	SMR-TSF	TSF bh <1.5m	Monthly Groundwater monitoring was undertaken in the period. TSF rise recorded during the period. Ongoing monitoring and reporting of TSF borehole fluctuations. As notified on 15/11/21, following a significant rainfall event in November Monitor Bore MB1 rose to less than 1 m below ground level, and MB2 to less than 1.5 m bgl. No TSF stability issues were identified by the Engineer of Record when provided this data.

7 Compliance with non-outcome-based tenement conditions

Table 14 shows review of SMR compliance against non-outcome-based lease conditions.

Table 14 Compliance against SMR non-outcome-based tenement lease conditions in the reporting period

Condition	Compliance status	Evidence
ML2662, ML2706, ML4745, ML4746, ML4747, ML2704, ML2663, ML2717, ML2718, ML2719, ML2657, ML4740, ML4741, ML4742, ML4743, ML4744, ML4770, ML4771, ML4772, ML4773, ML4774, ML4775, ML4735, ML4736, ML4737, ML4738, ML4739, ML6361, ML6362, ML 6441, MPL51, MPL52, MPL54, MPL55, MPL70, MPL123		
Mining operations authorised by this Lease must only be for the recovery of Iron Ore	Compliant	The tenements were only used for the agreed purposes during the reporting period.
The Lessee must not commence or undertake any mining operations on the land until a Mining and Rehabilitation Program (MARP) has been approved by the Minister and a bond has been paid in accordance with Section 62 of the Mining Act 1971	Compliant	Mining and processing operations were undertaken and managed in compliance with MPEPR2021/008 during the reporting period. No request for payment of a bond was received during the reporting period.
The Lessee must prepare a MARP that complied with the requirements of guidelines approved by the Director of Mines and include environmental outcomes and criteria that are developed in consultation with relevant stakeholders	Compliant	Mining and processing operations were undertaken and managed in compliance with MPEPR2021/008 during the reporting period.
The criteria included in the MARP must demonstrate clear and unambiguous achievement of the environmental and mine closure outcomes specified in the Second Schedule by: <ul style="list-style-type: none"> • Including the specific parameters to be measure and monitored by the Lessee • Specifying the locations that the parameters will be measured or how these locations will be determined • Clearly stating the acceptable values for demonstrating achievement of the outcome, with consideration of any inherent errors of measurement • Specifying the frequency of monitoring by the Lessee • Identifying what background or control data are to be used of specify how it will be acquired (if necessary) 	Compliant	Mining and processing operations were undertaken and managed in compliance with MPEPR2021/008 during the reporting period.
The Lessee must review the Mining and Rehabilitation Program (MARP) on request of the Director of Mines within a time specified in the request and submit the revised MARP for approval to the Director of Mines	Compliant	The PEPR was reviewed and renewed during the reporting period.
The Lessee agrees to the approved MARP being made available for public inspection	Compliant	N/A
The Lessee must provide information as requested by and to the satisfaction of the Director of Mines, on the Lessee's capability and competence to comply with the requirements of the Mining Act 1971, the conditions of this Lease, and the MARP in accordance with approved guidelines or as otherwise specified by the Director of Mines	Compliant	All requests for information have been complied with during the reporting period.
The Lessee must provide to the Director of Mines a Mining and Rehabilitation Compliance Report (MARCR) on operations carried out on the Lease and compliance with the approved MARP. The MARCR must be submitted every year, within 2 months after the anniversary of the date the Lease was granted, or at some other time agreed with the Director of Mines in accordance with guidelines approved	Compliant	This document meets the requirements of this item.

by the Director of Mines. The Lessee agrees to the MARCR being made available for public inspection		
The Lessee must if requested by the Director of Mines, undertake an independent audit of achievement of the environmental outcomes in the MARP, by an independent expert approved by the Director of Mines and submit the audit to the Director of Mines. The lessee agrees to the audit being made available for public inspection	Compliant	No requests for audits were received during the reporting period.
At least 3 months prior to Lease relinquishment or expiry, the Lessee must provide to the Minister a Mine Completion Report prepared in consultation with the landowner and in accordance with guidelines approved by the Director of Mines, which demonstrates achievement of the closure criteria as specified in the current MARP	Compliant	Closure of the operation or relinquishment of the lease was not applicable during this reporting period.
The Lessee must prior to commencing operations under this Lease and for the duration of the lease maintain public liability insurance to cover all operations under the Lease (including sudden and accidental pollution) in the name of the Lessee for a sum not less than \$20 million or such greater sum as specified by the Director of Mines, and make such amendments to the terms and conditions of the insurance as the Director of Mines may require	Compliant	Public liability insurance was maintained for the reporting period. Refer to Appendix A.
A copy of the cover note of certificate of currency for the insurance must be provided to the Director of Mines upon request	Compliant	Public liability insurance was maintained for the reporting period. Refer to Appendix A.
If requested by the Director of Mines, the Lessee must engage an independent and reputable risk assessor to prepare a risk assessment report detailing the public liability risks arising out of the conduct of operations on the Lease and recommending the level of amount of public liability cover (in respect of any one occurrence) that should be affected and maintained by the Lessee. In preparing the risk assessment report, the assessor must consult with the landowner and the Director of Mines	Compliant	No request for an independent risk assessment was received during the reporting period.
In specifying the level of insurance required, the Director of Mines accepts no liability for the completeness, adequacy of the sum insured, the limit of liability, the scoped coverage, the conditions, or exclusions of the insurance in respect of how the Lessee may or may not respond to any loss, damage, or liability	Noted	N/A
The Lessee must report any non-compliance with these conditions and approved MARP to the Director of Mines. A verbal notification must be provided within 24 hours, after the Lessee becomes aware of the non-compliance. A written report must be provided within 3 calendar days or such time period as approved by the Director of Mines	Compliant	All non-compliances were reported as appropriate. Refer to Section 8.
In requesting a review of the bond required under the Mining Act 1971 the Minister may request that written quotes from an independent third party approved by the Minister are obtained by the Lessee for the cost of rehabilitating the site to the requirements specified in the approved MARP	Compliant	No request was received to review the bond during the reporting period.
The Lessee must meet all the charges and costs in obtaining and maintaining the Bond	Compliant	SIMEC maintained all charges and costs associated with obtaining and maintaining the Bond.
ML 2652, ML2648 – ML2651, ML 2668 – ML2669, ML2677, ML2682 – ML2683, ML2701, ML2712, ML2714 – ML2716, ML2720		
1. The lessee will during the said term pay or cause to be paid to the Minister of Mines (hereinafter referred to as “the Minister”) at the office of the Department of Mines in the City of Adelaide on behalf of the Governor the rent and other sum hereby reserved at the times and in the manner hereinbefore appointed for payment thereof free and clear of all rates taxes impositions outgoings and deductions whatsoever	Compliant	All taxes and royalties were paid as required during the reporting period.

2. That the lessee will pay and discharge all rates taxes assessments impositions and outgoings which during the said term shall become payable in respect of the said land and premises	Compliant	All taxes and royalties were paid as required during the reporting period.
3. That the lessee will maintain in position during the said term the posts and trenches or piles of stone required by the said to be erected or put on the said land when the same was pegged out as a claim and in addition thereto will paint legibly on such posts the number of this lease	Compliant	All tenements were delineated as required during the reporting period.
4. That the lessee will during the said term make construct and work all mines and so and perform all things authorised by this lease in a fair orderly, skilful and workmanlike manner	Compliant	Operations within the tenements were conducted in a fair, orderly, skilful, and workmanlike manner during the reporting period.
5. That the lessee will during the said term employ and keep constantly employed not less than one man for every ten acres of portion of ten acres except as provided by Regulation No. 125 in mining or prospecting for all metals and mineral except gold in or upon the said land and will whenever thereunto requires by the Minister furnish him with satisfactory evidence that such number of men have been and are so employed due allowance being made by the Minister for machinery or horses employed at the rate of two men for each horse or horsepower of machinery	No longer relevant	N/A
6. The lessee will make such provision for the disposal of silt sludge dirt waste or refuse which may be brought out by the said mines and premises so that the same will not flow or find its way into any stream brook river or water channel or so as to injure or interfere with any land set apart for water supply purposes	Compliant	All waste and surface water were managed in compliance with MPEPR2021/008 during the reporting period.
7. That the lessee will build and keep in proper repair a sufficient and substantial stone wall or other fence around all the pits and shafts which may at any time during the said term be open in any part of the said land and premises for the purpose of this lease so as effectually to prevent all access thereto by all kinds of cattle	Compliant	Land access and public safety was managed in compliance with PEPR2020/0603 during the reporting period.
8. That the lessee will whenever lawfully required do to for at the lessee's own cost and in manner required by any regulations for the time being in force in that behalf cause to be made a survey of the said land and cause to be forwarded to the said Department of Mines a map or plan of such survey	Compliant	No requests for surveys were received from the Department of Mines during the reporting period
9. That the lessee will at all times during the said term keep and preserve the said mines and premises in good order repair and condition and in such good order repair and condition at the end or other sooner determination of the said term deliver peaceable possession thereof and of all and singular the premises hereby leased unto the Governor or the Minister or to some officer authorised by him or them to receive possession thereof	Compliant	Mining operations were kept in good order, in compliance with SIMEC safety and operating management systems.
10. (a) That the lessee will half-yearly in the months of January and July furnish to the Warden of the mining district in which the said land is situated a full and true return showing in respect of the preceding half-year the quantity of stone or ore treated the quantity of metals and mineral taken from the said land and the working expenses incurred in and the gross proceeds and net profits received from the occupation and working of the said land and the sale of all metals and minerals	Compliant	Compliant due to mineral royalties accounting procedures in place between the regulator and SIMEC Mining. SIMEC provides updates annually via this Annual Compliance Report, which includes information on ore reserves and mineral resources. All requests for information were provided as required.
11. That the lessee will permit the pastoral lessee (if any) of the said land at all times to have free access and user for domestic purposes and for the purposes of watering stock to and of any surface water on the said land which shall not have been provided or stored by artificial means by the lessee	Compliant	Pastoral lease holders were permitted access to tenement areas where appropriate.
12. That the lessee will report to a Warden when payable gold is struck or metals precious stones minerals coal shale	Compliant	No other deposits were located during the reporting period.

oil salt or gypsum are found in payable quantities in or upon the said land		
13. The lessee will not during the continuance of the said term without the written consent of the Minister first had and obtained use or occupy or permit to be used or occupied the said land and premises other than for the purpose of exercising the rights and liberties hereinbefore granted	Compliant	The tenements were only used for the agreed purposes during the reporting period.
14. The lessee will not prevent any person who holds a right privilege or authority under the said Acts and regulations or any amendment thereof from exercising the same	Compliant	SIMEC allowed access to tenements where required, and safe to do so.
15. The lessee will not during the said term transfer assign sublet or otherwise dispose of or part with the possession of or mortgage charge or encumber the said land and premises or any part thereof or do not permit to suffer to be done any act matter or thing whereby the said land and premises or any part thereof shall or may be transferred assigned sublet or otherwise disposed of or the possession thereof parted with or mortgaged charged or encumbered to any person or persons for the whole or any part of the said term without the consent in writing of the Minister first hand and obtained for every such purpose	Compliant	SIMEC maintained possession and control of relevant tenements during the reporting period.
16. It shall be lawful for the Governor or the Minister or any person authorised by him or them at all proper and reasonable times during the said term without any interruption from the lessee or the lessee's agents servants or workmen to enter into and upon the said land and premises and into and upon any mines or works that may be found therein to view and examine the condition thereof and whether the same be worked in a proper skilful and workmanlike manner and for such purpose to make use of any of the railroad or other roads or ways machinery and work belonging to the said mines and premises and to examine and take extracts from all books accounts vouchers and documents relating thereto:	Compliant	Requests for entry onto the tenement and inspection of associated operations were accommodated as required during the reporting period.
17. That so far as applicable the provisions of the said Acts and all regulations made thereunder or any amendment of the said Acts are embodied and incorporated herein and the lessee hereby covenants to observe fulfil and perform the same	Compliant	SIMEC conducted mining and processing operations in accordance with relevant Acts and regulations, during the reporting period.
18. The lessee shall on due performance and observance of the covenants conditions and provisos herein contained be entitled to a renewal from time to time of this lease for any period at each renewal not exceeding twenty one years from the expiration of this lease or any renewal thereof at the rent for the time being chargeable by law in respect of leases of the same class as this lease and shall be subject to the covenants conditions and provisions prescribed by any Act or regulations for the time being in force relating to leases of the same class as this lease	Compliant	All tenement renewals were actioned as required during the reporting period.
19. If the said rent be not paid on or before the day hereinbefore appointed for payment thereof a penalty of five pounds per centum shall be added to the said rent and if the said rent and penalty not be paid within one calendar month after the said day a further penalty of ten pounds per centum shall be added and if the said rent and penalties be not paid within one calendar month after the said first month the same shall be recoverable by the Minister by action in any court or competent jurisdiction	Compliant	All rent, taxes and royalties were paid as required during the reporting period.
20. If the lessee shall during the said term commit any breach of or shall fail to comply with any covenant condition or proviso herein contained this lease shall be liable to forfeiture in manner hereinafter provided	Compliant	No breaches were reported during the reporting period.
21. If the said rent shall be in arrear and unpaid for more than three calendar months after the day at which the same is payable under this lease it shall be lawful for the Governor to cancel this lease and the Minister may	Compliant	All rent, taxes and royalties were paid as required during the reporting period.

thereupon insert a notice in the Government Gazette declaring this lease to be forfeited		
22. If the Minister has reason to believe that there has been a breach of or non-compliance with any of the covenants conditions or provisos herein contained other than a breach of the covenant for payment of the said rent or non-compliance with the labour conditions of this lease, the Minister shall give written notice to the lessee specifying the covenants conditions or provisos which he has reason to believe are not being complied with and notifying the lessee that this lease will be liable to forfeiture at the expiration of one month from the date of such notice unless in the meantime such covenants condition or provisos are duly complied with and if at the expiration of such notice such covenants conditions or provisos are still not being complied with by the lessee the Governor may cancel this lease notwithstanding that the rent payable under this lease for the period during which such breach is committed may have been paid and notwithstanding any implied waiver of such breach by the Governor and the Minister shall thereupon insert a notice in the Government Gazette declaring this lease to be forfeited. In case of a breach of the covenant for payment of the said rent or the non-compliance with the said labour conditions the Governor may exercise the power of cancellation without giving the written notice hereinbefore mentioned	Compliant	All rent, taxes and royalties were paid as required during the reporting period. No non-compliance notices were received by SIMEC during the reporting period.
23. A notice of forfeiture as herein before mentioned in the last two preceding provisos so published in the Government Gazette shall be taken to be conclusive evidence that this lease has been legally cancelled and forfeited	Compliant	No forfeiture occurred during the reporting period.
24. In case this lease shall become liable to forfeiture the Minister may (except as to any case coming under the operation of section 70 of the said Acts) extend the period during which the lessee may perform the covenants conditions and provisos of this lease for such time and subject to such terms and conditions as the Minister may think fit and the terms and conditions so imposed by the Minister shall bind the lessee and all transferees mortgagees assignees and other persons claiming through or under him and this lease shall thereafter be constructed as if the said terms and conditions were inserted therein	Compliant	No forfeiture occurred during the reporting period.
25. The lessee shall be at liberty to surrender this lease by giving to the Minister three calendar months' notice in writing of the lessee's desire or intention so to do and upon payment of all arrears or rent up to the date or surrender	Compliant	No surrender of tenement(s) occurred during the reporting period.
26. The lessee shall be at liberty to remove from the said land at any time within: (a) three months of the date of forfeiture or surrender of this lease any plant machinery engines or tools (b) six months from the date of forfeiture or surrender of this lease any ore or other substance mined by virtue of this lease and stacked upon the said land But shall not remove or interfere with any timber in any mine upon said land	Compliant	No forfeiture occurred during the reporting period. No surrender of tenement(s) occurred during the reporting period.
ML4714 – ML4720, ML4722 – ML4734, ML4761		
1. The Lessee will during the said term pay or cause to be paid to the Minister of Mines (hereinafter referred to as "the Minister") at the office of the Department of Mines in the City of Adelaide on behalf of the Governor the rent and further sums hereby reserved at the times and in the manner hereinbefore appointed for payment thereof free and clear of all rates taxes impositions outgoings and deductions whatsoever	Compliant	All rent, taxes and royalties were paid as required during the reporting period.

2. That the Lessee will pay and discharge all rates taxes assessments impositions and outgoings which during the said term shall become payable in respect of the said land	Compliant	All rent, taxes and royalties were paid as required during the reporting period.
3. That the lessee will maintain in position during the said term the posts and trenches or piles of stone required by the said regulations to be erected or cut on the said land when the same was pegged out as a claim and in addition thereto will paint legibly on such posts the number of this lease	Compliant	All tenements were delineated as required during the reporting period.
4. That the lessee will during the said term make construct and work all mines and do and perform all things authorised by this lease in a fair orderly, skilful and workmanlike manner	Compliant	Operations within the tenements were conducted in a fair, orderly, skilful, and workmanlike manner during the reporting period.
5. The lessee will during the said term employ and keep constantly employed not less than one man for every ten acres in mining or prospecting for all metals and minerals except gold in or upon the said land and will whenever thereunto required by the Minister furnish him with satisfactory evidence that such number of men have been and are so employed, due allowance being made by the Minister for machinery or horses employed at the rate of two men for each horse or horsepower of machinery and provided that if the number of men horsepower and horses employed by the lessee on any one or more of the mineral leases held by the lessee is not less than the total number of men horsepower and horses required to be employed by the lessee on all the mineral leases held by the lessee the lessee shall be deemed to have complied with this covenant	No longer relevant	N/A
6. The Lessee will make such provision for the disposal of silt sludge dirt waste or refuse which may be brought out by the said mines and premises so that the same will not flow or find its way into any stream brook river or water channel or so as to injure or interfere with any land set apart for water supply purposes	Compliant	All waste and surface water were managed in compliance with MPEPR2021/008 during the reporting period.
7. That the lessee will build and keep in proper repair a sufficient and substantial stone wall or other fence around all the pits and shafts which may at any time during the said term be open in any part of the said land and premises for the purpose of this lease so as effectually to prevent all access thereto by all kinds of cattle.	Compliant	Land access and public safety were managed in compliance with MPEPR2021/042 during the reporting period.
8. That the lessee will whenever lawfully required do to so at the lessee's own cost and in manner required by any regulations for the time being in force in that behalf cause to be made a survey of the said land and cause to be forwarded to the said Department of Mines a map or plan of such survey.	Compliant	No requests for surveys were received from the Department of Mines during the reporting period.
9. That the lessee will at all times during the said term keep and preserve the said mines in good order repair and condition and in such good order repair and condition at the end or other sooner determination of the said term deliver peaceable possession thereof and of the land hereby leased unto the Governor or the Minister or to some officer authorised by him or them to receive possession thereof.	Compliant	Mining operations were kept in good order, in compliance with SIMEC safety and operating management systems.
10. That the lessee will permit the pastoral lessee (if any) of the said land at all times to have free access and user for domestic purposes and for the purposes of watering stock to and of any surface water on the said land which shall not have been provided or stored by artificial means by the lessee.	Compliant	Pastoral lease holders were permitted access to tenement areas where appropriate.
11. That the lessee will report to a Warden when gold precious stones coals shale oil gypsum or other minerals other than iron ore or iron bearing substances are found in payable quantities in or upon the said land.	Compliant	No other deposits were located during the reporting period.

12. The lessee will not during the continuance of the said term without the written consent of the Minister first had and obtained use or occupy or permit to be used or occupied the said land and premises other than for the purpose of exercising the rights and liberties hereinbefore granted.	Compliant	The tenements were only used for the agreed purposes during the reporting period.
13. The lessee will not prevent any person who holds a right privilege or authority under the said Acts and regulations or any amendment thereof from exercising the same.	Compliant	SIMEC allowed access to tenements where required, and safe to do so.
14. It shall be lawful for the Governor or the Minister or any person authorised by him or them at all proper and reasonable times during the said term without any interruption from the lessee or the lessee's agents servants or workmen to enter into and upon the said land and into and upon any mines or works that may be found therein to view and examine the condition thereof and whether the same be worked in a proper skilful and workmanlike manner and for such purpose to make use of any of the railroad or other roads or ways machinery and work belonging to the said mines and premises and to examine and take extracts from all books accounts vouchers and documents relating thereto	Compliant	Requests for entry onto the tenements and inspection of associated operations were accommodated as required during the reporting period.
15. If the said rent be not paid on or before the day hereinbefore appointed for payment thereof a penalty of five pounds per centum shall be added to the said rent and if the said rent and penalty not be paid within one calendar month after the said day a further penalty of ten pounds per centum shall be added and if the said rent and penalties be not paid within one calendar month after the said first month the same shall be recoverable by the Minister by action in any court or competent jurisdiction.	Compliant	All rent, taxes and royalties were paid as required during the reporting period.
16. If the lessee shall during the said term commit any breach of or shall fail to comply with any covenant condition or proviso herein contained this lease shall be liable to forfeiture in manner hereinafter provided	Compliant	No breaches were reported during the reporting period.
17. If the Minister has reason to believe that there has been a breach of or non-compliance with any of the covenants conditions or provisos herein contained the Minister shall give written notice to the lessee specifying the covenants conditions or provisos which he has reason to believe are not being complied with and notifying the lessee that this lease will be liable to forfeiture at the expiration of one month from the date of such notice unless in the meantime such covenants condition or provisos are duly complied with and if at the expiration of such notice such covenants conditions or provisos are still not being complied with by the lessee the Governor may cancel this lease notwithstanding that the rent payable under this lease for the period during which such breach is committed may have been paid and notwithstanding any implied waiver of such breach by the Governor and the Minister shall thereupon insert a notice in the Government Gazette declaring this lease to be forfeited	Compliant	No non-compliance notices were received by SIMEC during the reporting period.
18. A notice of forfeiture so published in the Government Gazette shall be taken to be conclusive evidence that this lease has been legally cancelled and forfeited	Compliant	No forfeiture occurred during the reporting period.
19. In case this lease shall become liable to forfeiture the Minister may extend the period during which the lessee may perform the covenants conditions and provisos of this lease for such time and subject during such period of extension to such terms and conditions as the Minister may think fit	Compliant	No forfeiture occurred during the reporting period.
ML6055		
First Schedule		

1. Quarrying operations may be conducted for the recovery of iron ore from the area of the lease	Compliant	The tenements were only used for the agreed purposes during the reporting period.
2. The lessee must ensure that quarrying operations on the land are carried out in an orderly and skilful manner in accordance with a program for mining and rehabilitation of the land approved, from time to time, by the minister	Compliant	Operations within the tenements were conducted in a fair, orderly, skilful, and workmanlike manner during the reporting period.
3. The lessee must submit to the Director, from time to time, at the Director's request, a current plan or survey of the land in the form requested by the director	Compliant	No requests for surveys were received from the Department of Mines during the reporting period
4. The lessee shall ensure that land disturbed by quarrying operations is rehabilitated to achieve a regular landform, to minimise erosion, to establish native vegetation indigenous to the area, and return the land to a grazing after use	Compliant	Progressive rehabilitation was undertaken in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
Second Schedule		
1. The lessee shall ensure that as operations progress to appropriate stages, land disturbed by mining is progressively rehabilitated to facilitate regeneration of native vegetation	Compliant	Progressive rehabilitation was undertaken in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
2. The lessee shall ensure that rare or endangered species of native flora and fauna are identified, and a program implemented to ensure their survival and return to the area after operations are complete	Compliant	Flora and fauna were monitored and managed in compliance with MPEPR202/0603 during the reporting period.
3. The lessee shall ensure that an Environmental Management Plan is prepared, generally, in accordance with the recommendations of the University of South Australia's Centre for Environmental and Recreational Management report "A Biological Study of BHP Mining Leases in the South Middleback Ranges, SA" June 1997, Clark I. The Environmental Management Plan is to be implemented to the satisfaction of the Chief inspector of Mines	Compliant	SMR EMP has been implemented and utilised during the period.
4. The lessee shall ensure that all employees and contractors are made aware of the requirements to operate in a manner that will minimise environmental impact	Compliant	Employees are made aware of environmental management requirements during the reporting via the induction process and toolbox talks.
5. The lessee shall consult with the landowner and shall ensure the provision of grazing rights and the protection of stock by appropriate fencing or provide other compensation as may be agreed or determined in accordance with section 61 of the Mining Act, 1971	Compliant	Landholders were advised of activities as required during the reporting period.
6. The lessee shall ensure that waste dumps are contoured in harmony with the local topography and are constructed in a manner to prevent erosion and retain soil moisture in order to facilitate revegetation	Compliant	Mine closure and rehabilitation were managed in compliance with MPEPR2021/008 during the reporting period.
7. The lessee shall ensure that upon completion of quarrying operations, all plan, equipment, materials, and structures are removed from the site and the land is rehabilitated to the satisfaction of the Chief Inspector of Mines	Compliant	Closure of the operation or relinquishment of the lease was not applicable during this reporting period.
MPL70		
1. The development and operation of a service corridor to contain a power line and buried pipelines to transport concentrate and return water are operations ancillary to mining and may be carried out on the area of the licence	Compliant	The tenements were only used for the agreed purposes during the reporting period.
2. The licensee must ensure that activities ancillary to mining operations are carried out in an orderly and skilful manner in accordance with a program for mining and rehabilitation of the land approved, from time to time, by the minister	Compliant	Operations within the tenements were conducted in a fair, orderly, skilful, and workmanlike manner during the reporting period.
3. The licensee must ensure that land disturbed by activity ancillary to mining is rehabilitated to achieve a safe and stable landform consistent with the surrounding	Compliant	Progressive rehabilitation was undertaken in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.

environment, to minimise erosion and to re-establish native vegetation, indigenous to the area		
Second Schedule		
1. The licensee must ensure that as operations progress to appropriate stages, land disturbed by operations ancillary to mining is progressively rehabilitated to facilitate regeneration of native vegetation	Compliant	Progressive rehabilitation was undertaken in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
2. At least two weeks prior to the commencement of operations ancillary to mining, the licensee must submit to the Minister a report detailing compliance with all the relevant regulatory approvals that apply to the proposed operations	Compliant	Not relevant to this reporting period.
3. The licensee must ensure that all available topsoil is progressively stripped ahead of land disturbance and appropriately managed for use in the rehabilitation of land disturbed by operations ancillary to mining	Compliant	Vegetation clearance, and removal and storage of topsoil, was undertaken as approved and in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
4. The licensee must ensure that all employees and contractors on-site are fully aware of the requirement to operate in a manner that will minimise environmental impact	Compliant	Employees are made aware of environmental management requirements during the reporting via the induction process and toolbox talks.
5. The licensee must abide by the provisions of the Aboriginal Heritage Act, 1988	Compliant	SIMEC undertook mining and processing activities in accordance with relevant Acts and legislation during the reporting period.

MPL72		
1. The construction and operation of a waste rock dump are operations ancillary to mining and may be carried out on the area of the licence	Compliant	The tenements were only used for the agreed purposes during the reporting period.
The licensee must ensure that activities ancillary to mining operations are carried out in an orderly and skilful manner in accordance with a program for mining and rehabilitation of the land approved, from time to time, by the Minister	Compliant	Operations within the tenements were conducted in a fair, orderly, skilful, and workmanlike manner during the reporting period.
The licensee must ensure that land disturbed by activity ancillary to mining is rehabilitated to achieve a safe and stable landform consistent with the surrounding environment, to minimise erosion and to establish native vegetation, indigenous to the area	Compliant	Vegetation clearance, and removal and storage of topsoil, was undertaken as approved and in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
Second Schedule		
1. The lessee must ensure that as operations progress to appropriate stages, land disturbed by mining is progressively rehabilitated to facilitate regeneration of native vegetation	Compliant	Progressive rehabilitation was undertaken in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
2. At least two weeks prior to the commencement of construction or mining the lessee must submit to the Minister a report detailing compliance with all the relevant regulatory approvals that apply to the proposed operations	Compliant	Not relevant to this reporting period.
3. The licensee must ensure that all available topsoil is progressively stripped ahead of land disturbance and must be temporarily stockpiled, for use in the rehabilitation of land disturbed by operations ancillary to mining	Compliant	Vegetation clearance, and removal and storage of topsoil, was undertaken as approved and in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
The licensee must ensure that rare or endangered species of native flora and fauna are identified, and a program implemented to ensure their survival and return to the area after operations are complete	Compliant	Flora and fauna were monitored and managed in compliance with MPEPR2021/0603 during the reporting period.
5. The lessee must ensure that all employees and contractors on-site are fully aware of the requirement to operate in a manner that will minimise environmental impact	Compliant	Employees are made aware of environmental management requirements during the reporting via the induction process and toolbox talks.
6. The licensee must abide by the provisions of the Aboriginal Heritage Act, 1988	Compliant	SIMEC undertook mining and processing activities in accordance with relevant Acts and legislation during the reporting period.

MPL73		
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First Schedule		
1. The construction and operation of a tailings storage facility are operations ancillary to mining and may be carried out on the area of the licence	Compliant	The tenements were only used for the agreed purposes during the reporting period.
2. The licensee must ensure that activities ancillary to mining operations are carried out in an orderly and skilful manner in accordance with a program for mining and rehabilitation of the land approved, from time to time, by the Minister	Compliant	Operations within the tenements were conducted in a fair, orderly, skilful, and workmanlike manner during the reporting period.
3. The licensee must ensure that land disturbed by activity ancillary to mining is rehabilitated to achieve a safe and stable landform consistent with the surrounding environment, to minimise erosion and to establish native vegetation, indigenous to the area	Compliant	Vegetation clearance, and removal and storage of topsoil, was undertaken as approved and in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
Second Schedule		
1. The licensee must ensure that as operations progress to appropriate stages, land disturbed by operations ancillary to mining is progressively rehabilitated to facilitate regeneration of native vegetation	Compliant	Progressive rehabilitation was undertaken in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
2. At least two weeks prior to the commencement of operations ancillary to mining, the licensee must submit to the Minister a report detailing compliance with all the relevant regulatory approvals that apply to the proposed operations	Compliant	Not relevant to this reporting period.
3. The licensee must ensure that all available topsoil is progressively stripped ahead of land disturbance and must be temporarily stockpiled, for use in the rehabilitation of land disturbed by operations ancillary to mining	Compliant	Vegetation clearance, and removal and storage of topsoil, was undertaken as approved and in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
4. The licensee must ensure that rare or endangered species of native flora and fauna are identified and a program implemented to ensure their survival and return to the area after operations are complete	Compliant	Flora and fauna were monitored and managed in compliance with MPEPR202/0603 during the reporting period.
5. The licensee must ensure that all employees and contractors on-site are fully aware of the requirement to operate in a manner that will minimise environmental impact	Compliant	Employees are made aware of environmental management requirements during the reporting via the induction process and toolbox talks.
MPL 74		
First Schedule		
1. The construction and operation of a tailings storage facility are operations ancillary to mining and may be carried out on the area of the licence	Compliant	The tenements were only used for the agreed purposes during the reporting period.
2. The licensee must ensure that activities ancillary to mining operations are carried out in an orderly and skilful manner in accordance with a program for mining and rehabilitation of the land approved, from time to time, by the Minister	Compliant	Operations within the tenements were conducted in a fair, orderly, skilful, and workmanlike manner during the reporting period.
3. The licensee must ensure that land disturbed by activity ancillary to mining is rehabilitated to achieve a safe and stable landform consistent with the surrounding environment, to minimise erosion and to establish native vegetation, indigenous to the area	Compliant	Vegetation clearance, and removal and storage of topsoil, was undertaken as approved and in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
Second Schedule		
1. The licensee must ensure that as operations progress to appropriate stages, land disturbed by operations ancillary to mining is progressively rehabilitated to facilitate regeneration of native vegetation	Compliant	Progressive rehabilitation was undertaken in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
2. At least two weeks prior to the commencement of operations ancillary to mining, the licensee must submit to the Minister a report detailing compliance with all the relevant regulatory approvals that apply to the proposed operations	Compliant	Not relevant to this reporting period.

3. The licensee must ensure that all available topsoil is progressively stripped ahead of land disturbance and must be temporarily stockpiled, for use in the rehabilitation of land disturbed by operations ancillary to mining	Compliant	Vegetation clearance, and removal and storage of topsoil, was undertaken as approved and in compliance with MPEPR2021/008 during the reporting period. Refer to Section 7.
4. The licensee must ensure that rare or endangered species of native flora and fauna are identified and a program implemented to ensure their survival and return to the area after operations are complete	Compliant	Flora and fauna were monitored and managed in compliance with MPEPR202/0603 during the reporting period.
5. The licensee must ensure that all employees and contractors on-site are fully aware of the requirement to operate in a manner that will minimise environmental impact	Compliant	Employees are made aware of environmental management requirements during the reporting via the induction process and toolbox talks.
6. The licensee must abide by the provisions of the Aboriginal Heritage Act, 1988	Compliant	SIMEC undertook mining and processing activities in accordance with relevant Acts and legislation during the reporting period.

8 Rectification of non-compliances

8.1 2021 non-compliances

There was one non-compliance recorded during the reporting period relating to the timing of annual external vegetation dust impact survey (not within calendar year 2021). The non-compliance was due to Covid-19 and operational issues. Survey timing for 2022 will be reviewed and planned to ensure compliance.

Table 15 Rectification of non-compliances at SMR in the reporting period

Date of incident	Type of incident	Incident description	Date reported to Minister	Cause of non-compliance	Actions taken and future actions
12/2021	Timing of vegetation dust impact survey	The timing of annual external vegetation dust impact survey (not within calendar year 2021).	N/A	Covid-19 and operational issues.	Timing for 2022 will be reviewed and planned to ensure compliance.

8.2 Outstanding items from previous reports

There are no non-compliances from previous reporting periods, which were not fully rectified at the time of reporting, that require a status update (Table 16).

Table 16 Outstanding items from previous reports

Year	Date of incident	Type of incident	Incident description	Date reported to Minister	Cause of non-compliance	Status
2015	None					
2016	None					
2017	None					
2018	None					
2019	None					
2020	None					

9 Disturbance and rehabilitation activities

9.1 Disturbance and rehabilitation

A total of 130.65ha of vegetation clearance and 17.54ha of rehabilitation occurred in the SMR during the reporting period (Table 17). This table also shows proposed disturbance and rehabilitation for the next reporting period.

Land disturbance during the reporting period was associated with an expansion of the Iron Duchess pit, ramps, and roads (Figure 6).

Rehabilitation works undertaken during the reporting period included progressive rehabilitation at Iron Knight and Iron Chieftain (Figure 7).

Table 17 Disturbance and rehabilitation in the SMR

Sub-Domain	Activity during 2021		Proposed next 12 months	
	Disturbed (ha)	Rehabilitated (ha)	Disturbance (ha)	Rehabilitation (ha)
Iron Chieftain				
Total this period	Nil	Nil	Nil	Nil
Previously reported	80.84	29.71		
Total to date	80.84	29.71		
Iron Knight				
Total this period	Nil	17.54	Nil	Nil
Previously reported	36.38	33.11		
Total to date	38.07	50.65		
South-SMR				
Iron Duchess	130.65	Nil	3.69	Nil
Iron Duke	Nil	Nil		
Iron Magnet	Nil	Nil	5	Nil
Total this period	130.65	Nil		
Previously reported	42.41	45.11		
Total to date	173.06	45.11		
Concentrator and OBP				
Total this period	Nil	Nil		
Previously reported	8.41	Nil		
Total to date	8.41	Nil		
Exploration – E-PEPR 2013-133 (exploration drilling activities on SMR tenements) refer to Appendix B				
Iron Duchess	0.35	Nil	0.3	Nil
Iron Duke	0	Ni		
Iron Magnet	0	Ni		
Iron Knight	0	Ni		
Iron Chieftain	0	Ni		
Total this period	0.35	Nil		



Figure 6 Vegetation clearances in the SMR for the current reporting period



Figure 7 Rehabilitation in the SMR for the current reporting period

9.2 Strategies to minimise disturbance

SIMEC utilises the QP50.65 – vegetation clearance process and a system of checks to minimise disturbance and the clearance of native vegetation at SIMEC Mining sites. The intent of this process is to ensure that all preparation and checks are carried out to the required extent and mistakes in the clearance of vegetation are avoided.

The QP50.65 clearance process is summarised below.

1. The requirement to disturb land or clear native vegetation is identified.
2. All possible alternatives and minimisation of disturbance considered.
3. A written request is submitted to the SIMEC Mining Environment Department accompanied by information, area required and a map.
4. The Environment Assurance Manager or delegate performs a Vegetation Clearance Compliance Assessment (VCCA).
5. If compliant with conditions, the Environment Assurance Manager or delegate and another environmental staff member sign, record and issue the permit to the Operations/Project Manager to proceed with vegetation clearance.
6. The Environment Department is notified on completion of works.
7. Post clearance assessment is completed by the Environment Department.

The QP50.65 process provides a best practice approach to identify and preserve natural vegetation to the greatest extent practicable.

9.3 Rehabilitation improvements

SIMEC Mining use annual Landscape Function Analysis (LFA) to measure the success of rehabilitation and to guide improvements to rehabilitation methods. At this stage, this monitoring is long term and ongoing and no improvements were identified during the reporting period. Any identified improvements will be reported on in future.

SIMEC Mining has also undertaken a review of rehabilitation inspection and survey methodologies leading to improvements in recording and monitoring rehabilitation at SIMEC Mining sites.

10 Reconciliation of native vegetation clearance

10.1 Native vegetation clearance

SIMEC Mining provides 20,872 ha of Significant Environmental Benefit (SEB) offset through the purchase and donation of the Whyalla Conservation Park and Pastoral Lease, an area of high biodiversity, to the National Parks and Wildlife Service (NPWS) as Shirrocoe Reserve. In 2010 Shirrocoe was proclaimed as the Ironstone Hill Conservation Park under the National Parks and Wildlife Act 1972.

Vegetation clearance has occurred over the IBMA, and throughout the Middleback Ranges (MBR), since mining began in the 1930's. As part of SIMEC Mining's environmental management of native vegetation, SIMEC maintains an SEB credit ledger covering all native vegetation clearance by the Company in the MBR since the introduction of the SEB system.

The current MBR PEPR assigns an SEB offset ratio or SEB points value to all SIMEC Mining native vegetation clearing activities. Native Vegetation Council accredited vegetation consultants recommended these ratios or SEB points based on assessment of the biodiversity and conservation values of the vegetation to be cleared.

In accordance with PEPR2020/0603 (and other SIMEC Mining Middleback Ranges PEPRs), SIMEC Mining offsets cleared native vegetation through the use of these SEB credits. From 2021 the SEB points method is used, rather than the hectare ratio method, and payment into the SEB fund (or purchase of SEB points) will be used in the future if sufficient credit points from SIMEC's own SEB areas are not available. New SEB points were assigned in the PEPR approved on the 30th of June and in the Native Vegetation Management Plan (NVMP) approved on 1 December 2021. The total of new points was well within the SEB points available. As required in the PEPR approval letter and referred to in the NVMP approval letter, SIMEC is undertaking an external audit of its SEB ledger to resolve a possible historic miscount of SEB points in the ledger. The audited and agreed new balance of SEB points, if adjustment is required, will be used in PEPR approval from 2022.

Table 18 provide the actual areas of vegetation cleared, the areas rehabilitated for the period and the areas cleared to date.

Table 18 Maximum approved native vegetation clearance areas

SMR Domain	Maximum approved area to be cleared (ha)	Area cleared to-date (ha as of December 2021)
Iron Chieftain		80.84
Iron Knight		38.07
South SMR	609.26	173.06
Concentrator and OBP		8.41
Total		300.38

10.2 Provision of information

The following information was provided to demonstrate compliance with the Native Vegetation Management Plan:

- Review of Uplands SEB Block A photo points – EBS Ecology July 2021.
- Uplands SEB Area – Native Vegetation Management Plan – Annual Progress Update Memo FY2020-21.
- Ongoing Correspondence with NVC.

11 Environment Protection and Biodiversity Conservation Act 1999 Reporting

SIMEC has no requirement to demonstrate compliance with the Commonwealth *Environment Protection and Biodiversity Conservation (EPBC) Act 1999*, as none of the Company's tenements in the SMR mining area are subject to a controlled action under the Act.

12 Exempt land

SIMEC Mining's SMR operation does not impact any land exempt under Section 9 of the Mining Act.

13 Complaints

SIMIC Mining received one complaint regarding SMR operations in 2021 (Table 19).

Table 19 Complaints register – SMR (1 January to 31 December 2021)

Complaint reference	Date complaint received	Nature of the complaint	Was the complaint a result of a PEPR non-compliance?	Resolution date	Action taken
FY21-85	24/5/21	Dust, pollution, and health concerns	No	24/06/21	An investigation was completed. Ongoing monitoring of high wind days and management of activities on and leading up to these days will be undertaken. There will also be an ongoing continued focus on dust control strategies (FDR standard and Automated dust monitoring)

14 Management system reviews

14.1 ISO AS/NZS 14001 audit

Due to COVID-19, SAI Global completed a remote partial integrated audit of SIMEC Mining & Liberty Primary Steel Whyalla Steelworks as part of its ISO AS/NZS 14001 surveillance program (certificate number C10317) in October 2021. The audit was conducted using MS Teams and the provision of some objective evidence through OneDrive. The partial audit was completed successfully and followed up by an on-site “Site Aspects” audit in December which finalised the EMS surveillance audit.

The purpose of the audit was to determine implementation of the business’ management system in ensuring continual compliance with customer, statutory and regulatory requirements, and in meeting its specified objectives; and the conformity of the management system to stated criteria.

The audit has determined that the GFG management system has the ability to ensure the organisation meets its identified applicable statutory, regulatory, and contractual requirements relevant to the scope of certification.

The audit has determined that the GFG management system is effective in ensuring that the organisation can reasonably expect to achieve its defined objectives. The recommendation from the audit was that the current certification to ISO14001:2015 be extended. (SAI Global)

The results of the audit were once again generally positive, there were no non compliances or major non-conformances raised. Nine minor non-conformances (previously known as Areas of Concern) from the audit of the Middleback Ranges mine identified during the audit. None of the non-conformances related to the SMR site specifically.

14.2 Internal reviews and audits

In 2021, SIMEC Mining completed 31 inspections and audits at SMR (Table 20).

Table 20 SIMEC Mining audits and reviews

Date	Audit Type	Classification
January 2021	Stormwater infrastructure inspection – SMR	Internal site
January 2021	Bunding and Biopad Audit – SMR	Internal site
January 2021	Groundwater level and dust deposition monitoring	Internal site
February 2021	Groundwater level and dust deposition monitoring	Internal site
March 2021	Vegetation Dust Impact Inspection	Internal site
March 2021	Rehabilitation LFA	Internal site
March 2021	Groundwater level and dust deposition monitoring	Internal site
April 2021	TSF vegetation impact monitoring – SMR TSF	Internal site
April 2021	Groundwater level and dust deposition monitoring	Internal site
May 2021	Topsoil Stockpile Inspection	Internal site
May 2021	Weed Audit – SMR	Internal site
May 2021	Groundwater level and dust deposition monitoring	Internal site
June 2021	Groundwater level and dust deposition monitoring	Internal site
June 2021	Annual groundwater monitoring	Internal site
July 2021	Waste management audit – SMR	Internal site
July 2021	Groundwater level and dust deposition monitoring	Internal site
July 2021	Vegetation Dust Impact Inspection	Internal site
July 2021	Bunding and Biopad Audit – SMR	Internal site

Date	Audit Type	Classification
August 2021	Stormwater infrastructure inspection – SMR	Internal site
August 2021	SMR Bunding Audit	Internal site
August 2021	TSF vegetation impact monitoring – SMR TSF	Internal site
September 2021	Groundwater level and dust deposition monitoring	Internal site
September 2021	Stormwater infrastructure inspection	Internal site
September 2021	Vegetation dust impact inspection	Internal site
October 2021	Groundwater level and dust deposition monitoring	Internal site
October 2021	Environment Regulatory Compliance Audit – SMR Iron Knight Processing (Bis) (Reg)	Internal site
October 2021	Weed Inspection – SMR	Internal site
October 2021	Topsoil Stockpile Inspection – SMR	Internal site
November 2021	Groundwater level and dust deposition monitoring	Internal site
November 2021	TSF vegetation impact monitoring – SMR TSF	Internal site
December 2021	Vegetation Dust Impact Inspection	External independent

15 Verification of uncertainty

Assumptions or uncertainties related to SMR operations in the reporting period are provided in Table 21 and Table 22.

Table 21 Uncertainties or assumptions relating to the approved PEPR for SMR in the reporting period

Description of assumption or uncertainty	Estimated date to resolve	Progress in reporting period	Confirmed	Forward work plan
Seepage from TSF resulting in groundwater mounding	Ongoing	Perimeter discharge/central decant design transition completed.	Monthly updates to DEM. Annual Update presented to DEM, DEW and EPA in August 2021.	Continue to implement five-year TSF management plan and update and implement Magnetite TSF Operating Manual.
Impact on vegetation health adjacent to the TSF	Ongoing, additional studies proposed for 2022	Monitoring ongoing. The need to improve monitoring methodology was identified.	Surveys using the existing method no longer provide a clear-cut distinction between impacted and not-impacted vegetation. Despite this, groundwater levels have been relatively steady over the past two years and lower than historical values associated with vegetation impacts.	Vegetation health impacts adjacent to the TSF were surveyed internally in 2021. Ongoing surveying will continue in 2022. An external review was undertaken to investigate vegetation health impacts at sites around the TSF. Results of this review will be used to alter ongoing assessment methodologies.

Table 22 Uncertainties or assumptions since the PEPR was approved for SMR in the reporting period

Description of assumption or uncertainty	Estimated date to resolve	Progress in reporting period	Confirmed	Forward work plan
Nil				

16 Changes to authorised operations and emerging environmental hazards

16.1 Changes to mining operations

There were no significant changes to mining operations over 2021. Changes to operations incorporated in the MPEPR submitted in May 2021 included extensions to existing mining areas within the SMR, including Duchess North D and the addition of the DLIMS plant. Further amendments were submitted for approval in December 2021 including the Magnetite Tailings Storage Facility (Mag TSF) Stage 3B buttress improvement works, plus restructuring the PEPR to excise the Native Vegetation Management Plan (NVMP) as a standalone document and no longer contained within the main report.

DEM approved MPEPR 2021/008 on the 30th of June 2021, updating MPEPR2020/0603. As well as Duchess North D mining and the DLIMS plant, the revision included updates to the FY21 rehabilitation works program and environmental monitoring, and other mostly minor updates (see PEPR2021/008 for details). Early works for the TSF Buttress 3B and the separated Native Vegetation Management Plan were, respectively, accepted on the 30th of November by DEM and approved on the 1st of December 2021 by DEW.

16.2 Emerging environmental hazards

No emerging environmental hazards were identified in 2021.

17 Technical reports

Table 23 shows a summary of technical data, studies and reports relevant to the SMR generated during the reporting period 1 January – 31 December 2021.

Table 23 SMR technical data, studies, and reports during the reporting period

Report	Author
TSF Raise 7 – Environmental investigation Reports – Various 2021	Various
DLIMS Project – Environmental investigation Reports – Various 2021	Various
SMR Fauna Monitoring	Ecological Horizons P/L
Vegetation Dust Impact Assessment - November 2021	EBS Ecology

18 Public liability insurance

SIMEC Mining holds insurance to cover legal liability in respect of property damage or personal injury arising out of an occurrence in connection with the Insured's business or products. The limits of liability are \$50,000,000 for any one occurrence, limited in respect of Products Liability to \$50,000,000 in the aggregate for all occurrences for the period of insurance. This insurance is current until 4pm 31 October 2022.

The Certificate of Currency is shown in **Appendix A**.

Appendix A: Certificate of Currency



Jamison Castro
Account Executive

Marsh Pty Ltd
ABN 86 004 651 512
One International Towers Sydney
100 Barangaroo Avenue
SYDNEY NSW 2000
PO Box H176
AUSTRALIA SQUARE NSW 1215
PH 02 8864 8888
jamison.castro@marsh.com
marsh.com.au

08 November 2021

CERTIFICATE OF CURRENCY COMBINED LIABILITY INSURANCE

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE HOLDER. IT DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICY. IT IS PROVIDED AS A SUMMARY ONLY OF THE COVER PROVIDED AND IS CURRENT ONLY AT THE DATE OF ISSUE. FOR FULL PARTICULARS, REFERENCE MUST BE MADE TO THE CURRENT POLICY WORDING

INSURED

GFG Alliance Australia (comprising of Liberty Infrabuild Ltd, Liberty Primary Metals Australia Pty Ltd, SIMEC (Australia) Mining Pty Ltd, GFG Foundation (Australia) Ltd, Jahama Property Services Pty Ltd, Liberty ONESTEEL Corporate Services Pty Ltd, Liberty GREENPOWER Pty Ltd & SIMEC Energy Australia Pty Ltd) and all companies under their effective management control and all subsidiary corporations and related body corporates as defined in the Corporations Act 2001 (including those acquired or incorporated during the Period of Insurance) for their respective rights and interests

OTHER INTERESTED PARTIES

Noting the rights of; Minister for Mineral Resources and Energy for their respective rights and interests

PERIOD OF INSURANCE

From 4:00pm local standard time on 31/10/2021 to 4:00pm local standard time on 31/10/2022

Any subsequent period for which the Insured has requested and the Insurer has accepted.

INSURER

NAME	POLICY NUMBER	PARTICIPATION %
HDI Global SE Australia	110-01810346-14112 & 110-01810346-14123	100

INTEREST INSURED

Legal Liability to third parties for personal injury and/or property damage (including loss of use of property not damaged) happening during the period of insurance arising out of the business and/or the products as a result of an occurrence. All charges, expenses, legal and other costs incurred as the result of an Occurrence

LOCATION

South Middleback Ranges Mining Area

SOLUTIONS...DEFINED, DESIGNED, AND DELIVERED.



COVERING

All sums which the insured shall become legally liable to pay for Compensation in accordance with the law of any country or assumed under contract or agreement in respect of:

- a) Personal Injury
- b) Property Damage
- c) Advertising Liability

As a result of an Occurrence and happening in connection with the Insured's Business or Products.

TERRITORIAL LIMITS

Worldwide

LIMITS OF LIABILITY

The limit of the Insurer's liability:

- shall apply exclusive of indemnity provided for under Additional Supplementary Payments
- shall not exceed the following amounts except as otherwise provided in the Policy

Primary Cover

- | | |
|---|--------------|
| • Public Liability - any one occurrence | \$50,000,000 |
| • Product Liability - annual aggregate | \$50,000,000 |

Indemnity is subject to the terms and conditions of the Policy, including any applicable Sub-Limit of Liability and Deductible.

In accordance with the ongoing commitment by Marsh to quality management philosophies, this certificate has been verified for accuracy of content by:

Yours faithfully,



Jamison Castro
Account Executive



Jamison Castro
Account Executive

Marsh Pty Ltd
ABN 86 004 651 512
One International Towers Sydney
100 Barangaroo Avenue
SYDNEY NSW 2000
PO Box H176
AUSTRALIA SQUARE NSW 1215
PH 02 8864 8888
jamison.castro@marsh.com
marsh.com.au

04 November 2020

CERTIFICATE OF CURRENCY COMBINED LIABILITY INSURANCE

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE HOLDER. IT DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICY. IT IS PROVIDED AS A SUMMARY ONLY OF THE COVER PROVIDED AND IS CURRENT ONLY AT THE DATE OF ISSUE. FOR FULL PARTICULARS, REFERENCE MUST BE MADE TO THE CURRENT POLICY WORDING

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GFG Alliance Australia (comprising of Liberty Infrabuild Ltd, Liberty Primary Metals Australia Pty Ltd, SIMEC (Australia) Mining Pty Ltd, GFG Foundation (Australia) Ltd, Jahama Property Services Pty Ltd, Liberty ONESTEEL Corporate Services Pty Ltd, Liberty GREENPOWER Pty Ltd & SIMEC Energy Australia Pty Ltd) and all companies under their effective management control and all subsidiary corporations and related body corporates as defined in the Corporations Act 2001 (including those acquired or incorporated during the Period of Insurance) for their respective rights and interests

OTHER INTERESTED PARTIES

Noting the rights of; Minister for Mineral Resources and Energy for their respective rights and interests

PERIOD OF INSURANCE

From 4:00pm local standard time on 31/10/2020 to 4:00pm local standard time on 31/10/2021

Any subsequent period for which the Insured has requested and the Insurer has accepted.

INSURER

NAME	POLICY NUMBER	PARTICIPATION %
Zurich Insurance Australia Limited	72 2232551 GLR & 72 2232552 GLR	100

INTEREST INSURED

Legal Liability to third parties for personal injury and/or property damage (including loss of use of property not damaged) happening during the period of insurance arising out of the business and/or the products as a result of an occurrence. All charges, expenses, legal and other costs incurred as the result of an Occurrence

LOCATION

South Middleback Ranges Mining Area

SOLUTIONS...DEFINED, DESIGNED, AND DELIVERED.



COVERING

All sums which the insured shall become legally liable to pay for Compensation in accordance with the law of any country or assumed under contract or agreement in respect of:

- a) Personal Injury
- b) Property Damage
- c) Advertising Liability

As a result of an Occurrence and happening in connection with the Insured's Business or Products.

TERRITORIAL LIMITS

Worldwide

LIMITS OF LIABILITY

The limit of the Insurer's liability:

- shall apply exclusive of indemnity provided for under Additional Supplementary Payments
- shall not exceed the following amounts except as otherwise provided in the Policy

Primary Cover

- | | |
|---|--------------|
| • Public Liability - any one occurrence | \$50,000,000 |
| • Product Liability - annual aggregate | \$50,000,000 |

Indemnity is subject to the terms and conditions of the Policy, including any applicable Sub-Limit of Liability and Deductible.

In accordance with the ongoing commitment by Marsh to quality management philosophies, this certificate has been verified for accuracy of content by:

Yours faithfully,



Jamison Castro
Account Executive

Appendix B: Exploration Vegetation Clearance and Rehabilitation - Boreholes

HOLEID	PROJECTCODE	PROSPECT	TENEMENTID	AMG66_53_East	AMG66_53_North	RL	DEPTH	STARTDATE	ENDDATE	GEOLOGIS	REHAB_ST	AZIMUTH	INCLINAT	HOLE_STA	MGA94_5	MGA94_5	MGA94_5	DRILL_TYS	SUMPS	SUMP_SIZE	PADSIZE	PADSIZE_COMMENTS
DS098RC	DC	Iron Duchess	ML4733	696862.28	6318075.887	359.094	364	12-May-21	14-May-21	W.GIULIAN		270	-80	D	696991.6	6318247	359.094	RC	0		600	Pad Extension existing 20m x 20m Actual clearance 10m x 20m
DS184RD	DC	Iron Duchess	ML4731	696847.367	6317704.679	363.255	300.5	9-Aug-21	28-Aug-21	P.NGUYEN		175	60	D	696976.6	6317876	363.255	DDH	2	6m x 3m	600	Pad Extension existing 20m x 20m Actual clearance 10m x 20m
DS185RD	DC	Iron Duchess	ML4731	696880.91	6317757.355	370.145	320.3	29-Aug-21	17-Sep-21	P.NGUYEN		355	-65	D	697010.2	6317928	370.145	DDH	2	6m x 3m	600	Pad Extension existing 20m x 20m Actual clearance 10m x 20m
DS186DD	DC	Iron Duchess	ML4732	696854.408	6318002.321	368.736	360	18-May-21	10-Aug-21	P.NGUYEN		355	70	D	696983.7	6318173	368.736	DDH	2	6m x 3m	600	Pad Extension existing 20m x 20m Actual clearance 10m x 20m
DCDGT01	DN	Duchess D	ML2708	696313.77	6320054.32	356.358	180.5	18-Jun-21	18-Jul-21	P.NGUYEN		250	-55	D	696443	6320225	356.358	DDH	2	6m x 3m	600	20m x 30m plus 100m x 5m track
DCDGT03	DN	Duchess D	ML2708	696031.15	6319855	222.115	0			P.NGUYEN		90	-55	P	696160.4	6320026	222.115	DDH	2	6m x 3m	625	25m x 25m plus 20m x 10m track
DCDGT04	DN	Duchess D	ML2708	696076	6320084.57	246.497	106.2	26-May-21	11-Jun-21	P.NGUYEN		90	-55	D	696205.3	6320256	246.497	DDH	2	6m x 3m	625	25m x 25m

Exploration drillhole details 2021

HOLEID	PROSPECT	TENEMENTID	RL	DEPTH	STARTDATE	ENDDATE	REHAB_DATE
DCB008RC	Iron Duchess	ML2710	235.866	136	25-Feb-21	25-Feb-21	25-Aug-21
DCB009RC	Iron Duchess	ML6055	236.039	142	25-Feb-21	25-Feb-21	25-Aug-21
DCB010RC	Iron Duchess	ML6055	235.848	154	25-Feb-21	26-Feb-21	26-Aug-21
DCB011RC	Iron Duchess	ML2682	235.727	148	11-Mar-21	12-Mar-21	12-Sep-21
DCB012RC	Iron Duchess	ML2682	235.976	166	26-Feb-21	26-Feb-21	26-Aug-21
DCB014RC	Iron Duchess	ML2682	235.865	148	8-Mar-21	11-Mar-21	11-Sep-21
DCB015RC	Iron Duchess	ML2682	235.974	178	6-Mar-21	6-Mar-21	6-Sep-21
DCB016RC	Iron Duchess	ML2682	235.962	178	7-Mar-21	8-Mar-21	8-Sep-21
DCB018RC	Iron Duchess	ML2682	236.045	166	4-Mar-21	4-Mar-21	4-Sep-21
DCB022RC	Iron Duchess	ML2682	235.938	190	5-Mar-21	5-Mar-21	5-Sep-21
DCB025RC	Iron Duchess	ML2682	235.585	184	2-Mar-21	3-Mar-21	3-Sep-21
DCB027RC	Iron Duchess	ML2682	235.73	196	1-Mar-21	2-Mar-21	2-Sep-21
DCB029RC	Iron Duchess	ML2682	235.946	196	1-Mar-21	1-Mar-21	1-Sep-21
DCB031RC	Iron Duchess	ML2682	235.287	214	27-Feb-21	1-Mar-21	1-Sep-21
DCB033RC	Iron Duchess	ML2682	235.868	202	26-Feb-21	27-Feb-21	27-Aug-21
DS098RC	Iron Duchess	ML4733	359.094	364	12-May-21	14-May-21	14-Nov-21

HOLEID	PROSPECT	TENEMENTID	RL	DEPTH	STARTDATE	ENDDATE	REHAB_DATE
DS106RC	Iron Duchess	ML4733	320.153	418	19-Mar-21	23-Mar-21	23-Sep-21
DS111RC	Iron Duchess	ML2659	358.428	190	8-Apr-21	9-Apr-21	9-Oct-21
DS113RC	Iron Duchess	ML4733	346.299	160	9-Apr-21	11-Apr-21	11-Oct-21
DS113RCA	Iron Duchess	ML4733	346.299	364	11-Apr-21	14-Apr-21	14-Oct-21
DS117RC	Iron Duchess	ML4733	346.635	388	14-Apr-21	19-Apr-21	19-Oct-21
DS123RC	Iron Duchess	ML4733	344.967	364	28-Apr-21	2-May-21	2-Nov-21
DS131RC	Iron Duchess	ML4733	319.873	394	24-Mar-21	28-Mar-21	28-Sep-21
DS133RC	Iron Duchess	ML4731	353.429	478	9-Feb-21	13-Feb-21	13-Aug-21
DS161RC	Iron Duchess	ML4733	359.391	334	8-May-21	11-May-21	11-Nov-21
DS163RC	Iron Duchess	ML2659	364.154	430	3-Apr-21	8-Apr-21	8-Oct-21
DS164RC	Iron Duchess	ML4731	336.255	292	15-Mar-21	18-Mar-21	18-Sep-21
DS175RC	Iron Duchess	ML4734	319.873	472	29-Mar-21	2-Apr-21	2-Oct-21
DS176RC	Iron Duchess	ML4761	327.712	400	14-Feb-21	17-Feb-21	17-Aug-21
DS177RC	Iron Duchess	ML4761	327.804	448	12-Mar-21	15-Mar-21	15-Sep-21
DS178RC	Iron Duchess	ML4761	328.175	466	17-Feb-21	20-Feb-21	20-Aug-21
DS181RC	Iron Duchess	ML4731	336.375	430	4-Feb-21	8-Feb-21	8-Aug-21
DS184RD	Iron Duchess	ML4731	363.255	300.5	9-Aug-21	28-Aug-21	1-Jul-00
DS185RD	Iron Duchess	ML4731	370.145	320.3	29-Aug-21	17-Sep-21	1-Jul-00
DS186DD	Iron Duchess	ML4732	368.736	360	18-May-21	10-Aug-21	1-Jul-00
DS187RD	Iron Duchess	ML4733	351.656	68.1	10-Aug-21	30-Sep-21	30-Mar-22
DS188RC	Iron Duchess	ML4731	285.944	454	20-Feb-21	24-Feb-21	24-Aug-21
DS189RC	Iron Duchess	ML6431	328.042	298	10-Jun-21	13-Jun-21	13-Dec-21
DS190RC	Iron Duchess	ML6431	327.745	274	17-Jun-21	18-Jun-21	18-Dec-21
DS192RC	Iron Duchess	ML6055	327.943	442	14-Jun-21	16-Jun-21	16-Dec-21
DS193RC	Iron Duchess	ML6055	328.091	406	3-May-21	6-May-21	6-Nov-21
DS194RC	Iron Duchess	ML6055	328.026	256	18-Jun-21	19-Jun-21	19-Dec-21
DS196RC	Iron Duchess	ML4761	328.063	352	25-May-21	27-May-21	27-Nov-21
DS197RC	Iron Duchess	ML4761	327.979	412	5-Jun-21	7-Jun-21	7-Dec-21
DS198RC	Iron Duchess	ML4761	319.493	316	27-May-21	29-May-21	29-Nov-21
DS199RC	Iron Duchess	ML4761	323.739	250	17-May-21	19-May-21	19-Nov-21
DS200RC	Iron Duchess	ML4761	323.664	406	6-May-21	16-May-21	16-Nov-21

HOLEID	PROSPECT	TENEMENTID	RL	DEPTH	STARTDATE	ENDDATE	REHAB_DATE
DS201RC	Iron Duchess	ML4761	323.798	250	20-May-21	22-May-21	22-Nov-21
DS202RC	Iron Duchess	ML2677	324.117	250	8-Jun-21	10-Jun-21	10-Dec-21
DS203RC	Iron Duchess	ML2677	323.805	424	3-Jun-21	4-Jun-21	4-Dec-21
DS204RC	Iron Duchess	ML2677	324.021	364	22-May-21	24-May-21	24-Nov-21
DS205RC	Iron Duchess	ML2677	311.09	250	1-Jun-21	2-Jun-21	2-Dec-21
DS206RC	Iron Duchess	ML2677	310.217	268	30-May-21	1-Jun-21	1-Dec-21
DS207RC	Iron Duchess	ML2677	310.196	364	29-May-21	30-May-21	30-Nov-21
DS208RD	Iron Duchess	ML4733	345.728	339.4	30-Sep-21	5-Nov-21	1-Jul-00
DCDGT01	Duchess North	ML2708	356.241	180.5	18-Jun-21	18-Jul-21	1-Jul-00
DCDGT04	Duchess North	ML2708	246.206	106.2	26-May-21	11-Jun-21	11-Dec-21
MG176RD	Iron Magnet	ML6167	235.773	111.4	10-Jun-21	17-Jun-21	1-Jul-00
MG178RC	Iron Magnet	ML4730	268.053	448	25-Apr-21	28-Apr-21	28-Oct-21