



3 Water Street Red Hill 4059

T: +61 7 3368 1033

E: information@ardent-group.com.au

W: ardent-group.com.au

ABN: 38 609 696 764

INDEPENDENT COMPLIANCE AUDIT REPORT 2025

EPBC 2010/5642

Version 1.0

RTA Weipa Pty Ltd – Amrun Project

17 April 2025

RIO-016

Document Control Sheet

Ardent Group Pty Ltd	
Street Address:	3 Water Street, Red Hill Qld 4059
Postal Address:	PO Box 320 Red Hill Qld 4059
Phone:	+ 61 7 3368 1033
Email:	information@ardent-group.com.au
Web:	www.ardent-group.com.au

Project:	RIO-016	Issue Date:	17/4/2025
Title:	Independent Compliance Audit Report 2025 – EPBC 2010/5642		
Project Manager:	Lana Shoesmith		
Author:	Lana Shoesmith		
Client:	RTA Weipa Pty Ltd – Amrun Project		
Client Contact	Linda Wells		

Revision Number	Date	Prepared by	Approved by
Rev A	2/04/2025	LS	LW
01	17/04/2025	LS	LW

Table of Contents

1	EXECUTIVE SUMMARY	1
2	INTRODUCTION	2
2.1	Background.....	2
2.2	Status of Project.....	2
3	Audit Objective, Scope and Methodology.....	3
3.1	Overview	3
3.2	Objective	3
3.3	Scope.....	3
3.4	Auditor	3
3.5	Methodology	3
3.6	Reporting.....	4
4	Findings	6
4.1	Overview	6
4.2	Non-Compliances.....	6
4.3	Observations	6
4.3.1	Protection of Matters of National Environmental Significance	6
4.3.2	Additional Observation.....	7
4.4	Not Applicable	10
4.5	Compliance.....	11
	Table 1. Conditions Not Applicable with no further auditing requirements.	7
	Table 2. Conditions found to be Not Applicable for the current audit period.....	10
	Table 3. Conditions found in Compliance for the current audit period.	11
	Appendix 1 Audit Criteria Checklist	
	Appendix 2 Appointment of Independent Auditor and Approval of Audit Criteria	
	Appendix 3 Personnel Interviewed	
	Appendix 4 Auditor’s Declaration of Independence	
	Appendix 5 Auditor’s Certification	

1 EXECUTIVE SUMMARY

RTA Weipa Pty Ltd gained Commonwealth approval on 14 May 2013 to construct and operate a bauxite mine and associated processing and port facilities south of the existing operations at Weipa. The Project involves a staged increase in production to 50 million dry product tonnes per annum of bauxite. Physical works associated with the first construction stage are substantially complete and operations commenced 2nd December 2018.

As part of the Conditions of approval, RTA Weipa is required to ensure that an independent compliance audit is undertaken every three years. Ardent Group Pty Ltd has been contracted by RTA Weipa Pty Ltd to undertake an independent environmental compliance audit to determine compliance with the EPBC Approval (2010/5642) and Sea Dumping Permit (SD2017/3722). This report presents the audit findings.

It was found that RTA Weipa demonstrated compliance with the Conditions of the EPBC Approval 2010/5642 and Sea Dumping Permit 2020/3999. One minor administrative non-compliance was identified relating to late submission of the 2024 bathymetric survey data to the Australian Hydrographic Office.

2 INTRODUCTION

2.1 Background

The Amrun Project (formerly referred to as the South of Embley Project) involves the construction and operation of a bauxite mine and associated processing and port facilities on western Cape York. The Amrun Project is located near Boyd Point, approximately 40km south of Weipa. The Project involves a staged increase in production up to 50 million dry product tonnes per annum of bauxite. The initial production capacity of the Amrun Project is approximately 22.8 million dry product tonnes per annum.

RTA Weipa Pty Ltd has undertaken an Environmental Impact Statement for the SoE Project under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999*. The Project was approved on 14 May 2013 and an EPBC Permit was issued for the South of Embley Bauxite Mine and Port Development, Cape York Queensland (2010/5642). Since this time variations have been made to the conditions (3 June 2014, 9 June 2021 and 3 December 2021).

A Sea Dumping Permit No. SD2010/1762 was issued 29 July 2013 to RTA Weipa Pty Ltd to load for the purposes of dumping, and to dump, capital seabed material derived from the capital dredging to construct new port facilities between Boyd Point and Pera Head south of Weipa; and to develop at the Port of Weipa a roll-on and roll-off barge terminal at Humbug Wharf in the Embley River, a ferry terminal and tug berths at Hornibrook Point in the Embley River, and a combined barge/ferry terminal in the Hey River.

Once capital dredging had been completed, Sea Dumping Permit SD2017/3722 was issued 13/4/2018 to dump dredged material derived from maintenance dredging of the Amrun Port berth pocket and departure channel. Since this time a new Sea Dumping Permit 2020/3999 was issued extending until 31 January 2031.

As part of the EPBC 2010/5642 Conditions of approval (Condition 69), there is a requirement to ensure that an independent compliance audit is undertaken every three years. This is the fourth independent compliance audit relating to the EPBC Approval and Sea Dumping Permit.

2.2 Status of Project

Preliminary Works for the Amrun Project commenced in October 2015 and the Construction started on 12 May 2016. The Operations phase commenced 2 December 2018. Activities undertaken in the current audit period from April 2022 to March 2025 included:

- Shipping and production.
- Bauxite processing infrastructure - operation of the Amrun (Boyd) beneficiation plant.
- Product bauxite stockpiles - operation of beneficiated product stockpiles adjacent to Amrun (Boyd) Port.
- Ancillary infrastructure including diesel-fuelled power station, workshops, warehouse, administration facilities, package sewage treatment plant, temporary waste storage prior to disposal offsite and diesel storage facilities.
- Barge, ferry and tug facilities – operation of a new a roll on/roll off barge and ferry facility at Humbug Wharf, and a new barge and ferry terminal on the western bank of the Hey River.
- On-site camp - Amrun Accommodation Village

- Water infrastructure – operation of a water supply dam on a freshwater tributary of Norman Creek (Arraw Dam (formerly Dam C)), plus pipelines, water treatment plants (for potable water) and artesian bores.
- Port and ship-loading facilities – operation of the Port of Amrun, including ship-loading and tug mooring facilities between Boyd Point and Pera Head.
- Maintenance dredging activities.
- Rehabilitation works.

The Port of Weipa continues to receive deliveries of fuel, cargo, and equipment for the Amrun Project from domestic (mostly the Port of Cairns) and international ports. Materials are then transferred to smaller barges for transport across the Embley River, or by road, to the Amrun Project area.

3 Audit Objective, Scope and Methodology

3.1 Overview

An environmental compliance audit of the Amrun Bauxite Mine and Port Development Approval (EPBC 2010/5642) dated 3 December 2021 and the Sea Dumping Permit SD2020/3999 dated 21 January 2021, was conducted by Lana Shoesmith from Ardent Group Pty Ltd (CEnvP #092; Exemplar Global Master Environmental Auditor #12299) during the period 10-24 March 2025.

This is the fourth independent audit of the EPBC Approval 2010/5642 and associated sea dumping permit.

3.2 Objective

The objective of the audit was to determine compliance with the conditions of EPBC 2010/5642 and Sea Dumping Permit SD2020/3999 to address the requirements of EPBC 2010/5642 Condition 69, which requires that every three years from the date of the approval an independent audit must be conducted and a report submitted to the Minister.

3.3 Scope

The scope of the audit included all activities conducted since the last independent audit conducted in April 2022 until March 2025.

3.4 Auditor

Lana Shoesmith of the Ardent Group Pty Ltd was nominated by Rio Tinto as an independent auditor. This was subsequently approved by DCCEEW on 5 February 2025 (letter of approval included at Appendix 2).

3.5 Methodology

The audit was conducted in accordance with the Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of *Environmental Protection and Biodiversity Conservation Act 1999* (2019). The principles detailed in *ISO19011:2015 Guidelines for Auditing Management Systems* were adhered to as these are suitable for conducting legal compliance audits.

An audit criteria checklist and methodology were prepared and submitted to the DCCEEW for approval. This approval was granted by DCCEEW on 5 February 2025 (letter of approval included at Appendix 2).

The audit was conducted 10-24 March 2025. Documents and records were reviewed. Interviews were conducted with site personnel. Personnel interviewed during the audit are listed in Appendix 3. Evidence relating to implementation of the management plans was reviewed. The audit checklist was progressively completed.

3.6 Reporting

An audit checklist was completed addressing all requirements in the EPBC Approval and Sea Dumping Permits. In accordance with the Independent Audit and Audit Report Guidelines, findings were noted as follows:

Compliance – sufficient evidence provided to demonstrate that the requirements specified within a Condition have been met.

Non-compliance – sufficient evidence provided to demonstrate that the requirements specified in the Condition have not been met.

Observation – issue identified relevant to the protection of a matter of national environmental significance, not strictly related to compliance or non-compliance with a condition or element of a condition

Not applicable (NA) – condition that either:

- Did not require demonstration of the condition at the time of audit as the date had not yet passed; or
- Had to be satisfied after certain events had occurred e.g. notify Department in writing within 5 business days of any observation in the project area of Bare-rumped Sheath-tail Bat; or
- Where the activities specified in the Condition have not yet been required e.g. development of Offset Strategy; or
- The requirements of the condition had previously been satisfied and noted as Compliance in the audit checklist, however were not applicable for the current audit period. Of these, some conditions require no further auditing and are noted as such in the audit checklist.

This audit report summarises the audit findings, drawing attention to any non-compliances and observations; as well as conditions that were not applicable for the current audit period. A summary of compliance is also included.

Appendix 1 details the evidence reviewed (documents, records, interviews and observations) that addresses EPBC2010/5642 and Sea Dumping Permit SD2020/3999; and provides a detailed assessment of compliance for each audit criteria and condition.

Appendix 2 includes the Department of Climate Change, Energy, the Environment and Water approval of the appointment of Lana Shoesmith from Ardent Group Pty Ltd as the independent auditor and approval of the audit criteria and methodology.

Appendix 3 lists the personnel interviewed.

Appendix 4 includes the Auditor's Declaration of Independence signed by the Master Environmental Auditor declaring there is no conflicting or competing interests.

Appendix 5 contains the Auditor Certification signed by the Master Environmental Auditor certifying the findings of the audit in the report as being a true, correct, complete and independent assessment of compliance with the conditions of the EPBC Approval and Sea Dumping Permit.

4 Findings

4.1 Overview

It was found that RTA Weipa demonstrated compliance with the Conditions of the EPBC Approval 2010/5642 and Sea Dumping Permit 2020/3999.

4.2 Non-Compliances

One non-compliance was identified relating to late submission of the 2024 bathymetric survey data to the Australian Hydrographic Office (AHO).

Condition 20 of the SD Permit 2020/3999 requires that “Within two months of the final bathymetric survey being undertaken, RTA must provide a digital copy of the bathymetric surveys to the Australian Hydrographic Office”. This is relevant to condition 19 of the EPBC permit 2010/5642 which requires compliance with the requirements of any permits obtained under the Environment Protection (Sea Dumping) Act 1981.

The 2022 and 2023 bathymetric surveys were sent to AHS within two months, as required. The final 2024 Bathymetric survey was conducted 25/5/24. The digital copy of bathymetric surveys was sent to AHO on 4/9/24, which is over two months.

It should be noted that North Queensland Bulk Ports Corporation (NQBPC) conducted the maintenance dredging for Weipa and Amrun within the same dredge campaign. In 2024 the Weipa dredge campaign was split, substantially extending the completion date of the Weipa component to 18/7/24. The final bathymetry survey for Weipa was completed 27/7/24. It appears as though NAMASYS processed the Amrun and Weipa submissions together.

2/3 of the bathymetric surveys were provided to the AHO within the specified 2 month timeframe. It should be noted that the two month deadline is an arbitrary timeframe as it appears as though AHO do not rapidly process the data. Given that processing the data into the required format is a significant administrative burden, and the dredging campaign at Amrun is not operationally a separate campaign to that of Weipa, consideration could be made to amending the SD#20 condition to submit data to the AHO when requested.

4.3 Observations

4.3.1 Protection of Matters of National Environmental Significance

One observation was identified relating to issues relevant to the protection of a matter of national environmental significance.

Consideration should be made to reviewing the Feral Pig Management Offset Strategy (2016) (FPMOS), specifically to establish new goals and performance indicators and update the Implementation Plan to more accurately reflect the current management actions. It is evident that the Implementation Plan has effectively reduced feral pig numbers, resulting in significant increases in turtle numbers over recent years. Baseline data has now been well established. Furthermore the initial goal to achieve 70 percent reduction in the rate of feral pig nest predation within three years of

commencement of controls has been achieved and subsequently maintained. Additionally, the culling area has been substantially expanded beyond the project area specified in Condition 44. It is noted that the six control options that were initially designed to minimise feral pig predation have now been streamlined to focus on the two most effective options being aerial and ground shooting, which was based on the data gathered during the turtle survey periods.

The Amrun Annual Environmental Monitoring Reports and Annual EPBC Compliance Reports have accurately detailed feral pig eradication campaigns and marine turtle monitoring outcomes. It is well established that the implementation of the FPMOS has enhanced turtle hatchling survivorship by reducing the predation of turtle nests by feral pigs; and it is acknowledged that the feral pig control program has been implemented beyond the required Project Area. It is also noted that the EPBC Permit 2010/5642 does not specify a routine review.

4.3.2 Additional Observation

It is evident that there are conditions within the EPBC permit 2010/5642 that are no longer applicable, as summarised in Table 1. Consideration should be made to review and amend the EPBC permit 2010/5642 to more accurately reflect the existing and ongoing requirements, including removal of redundant conditions and conditions that have been completely satisfied. In particular, conditions with reference to:

- Requirements to be addressed prior to commencement of action
- The Temporary Barge Management Plan
- Construction Stage i
- Operations Stage ii
- Submission of initial documentation relating to commencement of works
- Bare-rumped Sheathtail Bat survey
- Inshore Dolphin Offset Strategy

It should be noted that compliance with the conditions listed in Table 1 was demonstrated during the relevant audit period. Detailed evidence is reported in the audit checklist (Appendix 1).

Table 1. Conditions Not Applicable with no further auditing requirements.

Condition	Summary of Requirement	Justification
1.1, 1.2 2.1 3.1, 3.2 4.1, 4.2.	Requirement to submit for approval a Temporary Barge Plan (TBP).	A TBP addressing all specified requirements was submitted and approved. No works in relation to the TBP have been undertaken. There is no operational requirement for a temporary barge to be built. Therefore, a TBP is not required. No further auditing required.
6.1j	Temporary Barge Plan can be incorporated into Marine and Shipping Management Plan.	Temporary Barge Plan is a separate document. The temporary barge was not constructed hence the TBP is not required. No further auditing required.

Condition	Summary of Requirement	Justification
8.1 8.2 8.3	Requirements relate to submission of the relevant Shipping Management Plan prior to the commencement of the relevant stage (initial construction – stage i), subsequent operations – stage ii, revision of MSMP – stage iii).	Condition 8.1 refers to initial construction stage i, with compliance reported in the 2016 and 2019 EPBC audit reports. Condition 8.2 refers to the operations stage ii, following construction, with compliance reported in 2019 EPBC audit report. Condition 8.3 refers to subsequent revisions of RTA Weipa South of Embley Project Operations Marine and Shipping Management Plan FINAL dated 2 October 2018, with compliance reported in the 2019 and 2022 EPBC audit reports. No further auditing required.
9.1	The subsequent Marine and Shipping Management Plan at condition 8 stage ii must be developed in consultation with relevant Commonwealth agencies, including the Australian Maritime Safety Authority and the Great Barrier Reef Marine Park Authority, and state agencies, including Maritime Safety Queensland.	Condition 8 specifies stage ii is the subsequent plan following the construction stage; while stage iii relates to subsequent revisions of the MSMP. Stage ii has been completed. The Project has been operating in stage iii operations phase during the current audit period. Compliance with the requirements of condition 9.1 were reported in the EPBC 2022 audit report. No further auditing required.
10.1	The Marine and Shipping Management Plan at condition 8, stage ii. must be reviewed, revised and submitted to the Minister for approval within two (2) years of operations commencing.	The Project has been operating in stage iii operations phase during the current audit period. Compliance with the requirements of condition 10.1 was reported in the EPBC 2022 audit report. No further auditing required.
11.1	The approved Construction Marine Shipping Management Plan must be implemented.	Construction has been completed and therefore this plan is no longer applicable, having been replaced by the Operations Marine Shipping Management Plan. Compliance with the Construction MSMP was reported in the EPBC 2016 and EPBC 2019 audit reports. No further auditing required.
11.2	The approved Marine and Shipping Management Plan at condition 8, stage ii. must be implemented for stage ii.	Stage ii, as defined by condition 8 has been completed. The Project operated in stage iii operations phase during the current audit period. EPBC 2022 audit report confirmed the implementation of the Operations Marine and Shipping Management Plan dated April 2021, relevant to stage ii. No further auditing required.

Condition	Summary of Requirement	Justification
29.1, 29.2	Terrestrial Management Plan must be submitted to the Minister for approval at least 6 months prior to commencement of the action and approved prior to commencement of action.	EPBC 2016 audit report confirms that the Terrestrial Management Plan was submitted and approved prior to commencement of action. No further auditing required.
30.1	Within 60 days of the first anniversary of operations commencing, the Terrestrial Management Plan must be reviewed, revised and submitted to the Minister for approval.	EPBC 2022 audit report confirms that the revised Terrestrial Management Plan was submitted within specified timeframe. No further auditing required.
31.1, 31.2, 31.3	Undertake a targeted Bare-rumped Sheath-tail Bat survey and support a research program including provide support to the reference call library.	Survey and research program obligations have been completed, as reported in EPBC 2016 and EPBC 2019 audit reports. No further auditing required.
33.1, 36.1	Requirement for Rehabilitation Strategy to be submitted for approval by 12/12/2022.	Rehabilitation Strategy was submitted for approval by 12/12/2022. No further auditing required
48.1, 48.2	Feral Pig Management Offset Strategy must be submitted for approval prior to commencement of the action	EPBC 2016 audit confirmed Feral Pig Management Offset Strategy submitted as specified. No further auditing required.
49.1 50.1, 50.2 51.1, 51.2, 51.3, 52.1, 53.1 54.1	Inshore Dolphin Offset Strategy	EPBC 2022 audit confirmed all relevant requirements of the Inshore Offset Dolphin Strategy have been demonstrated. Surveys were conducted in line with the commitments specified in the Inshore Dolphin Offset Strategy, contributing to independent research on dolphin species. No further auditing required.
55.1, 55.2	Inshore Dolphin Offset Strategy to be submitted for approval prior to commencement of the action	EPBC 2016 audit confirmed Inshore Dolphin Offset Strategy submitted as specified. No further auditing required.
66.1, 66.2, 66.3, 66.4	Notification requirements to Minister regarding commencement of works.	EPBC 2016 audit confirmed appropriate notifications were made. No further auditing required.
73.1	Commencement of the action must not occur after the first five (5) year anniversary of the date of this approval.	EPBC 2016 audit confirmed action commenced within the five year period. No further auditing required.

4.4 Not Applicable

Table 2 lists the conditions that were found to be not applicable for the current audit period. Those conditions that require no further auditing as they have been fully satisfied or no longer apply are listed above in Table 1. Detailed evidence is reported in the audit checklist (Appendix 1).

Table 2. Conditions found to be Not Applicable for the current audit period.

Condition	Summary of Requirement	Justification
12.1 13.1, 13.2	Measures must be implemented to minimise impacts from pile driving, including requirements relating to marine observers.	No pile driving operations occurred during the audit period.
14.1, 14.2 15.1	Requirements to submit Capital Dredge Management Plan for approval, including specified measures, prior to capital dredging.	Capital dredging plans submitted and approved as required. Capital dredging has been completed. No capital dredging occurred during the audit period.
16.1 17.1	Maintenance Dredging Management Plan/s for all maintenance dredging activities must be submitted to the minister for approval.	EPBC 2022 audit report confirmed the current Long-Term Maintenance Dredge Management Plan 2021 – 2031 was submitted and approved. No new maintenance dredging management plans were submitted during the current audit period.
18.1	The approved Capital Dredge Management Plan/s must be implemented in relation to capital dredge activities.	No capital dredging occurred during the audit period.
SD #1	Specifies terms	No action required
SD#7, SD#8, SD#10	Requirements relating to revision of LMDMP	No revision of the LMDMP has been made.
SD#12	Restrictions on dumping upon sighting marine species.	No marine species were sighted during dredging activities.
SD#13, SD#14	Management of environmental incidents.	No environmental incidents have occurred.
SD#16	Action in response to request by the Department to access site operations to review operation.	No request made.
30.3	The revised Terrestrial Management Plan must be implemented.	The revised Terrestrial Management Plan submitted in February 2025 has not yet been approved and therefore is not yet implemented. The existing TMP was found to be implemented.
31.4, 32.1	Actions to be taken if Bare-rumped Sheathail bats are found, including reporting.	No Bare-rumped Sheathail bats have been found.
36.2, 38.1	Rehabilitation Strategy	The Rehabilitation Strategy has been submitted in accordance but not yet been approved and therefore implementation is not yet required.

Condition	Summary of Requirement	Justification
37.1, 37.2		The Rehabilitation Strategy has been submitted but not yet been approved and therefore revision is not yet required.
39.1, 39.2, 40.1	Offset Strategy	Offset Strategy only required should rehabilitation objectives not meet the success criteria after 10 years.
56.2, 56.3,	Requirement to provide survey data, if requested	No request made.
63.1	Requirement must update specified programs upon request.	No request from the Minister.
67.2	Provide requested records to Department.	No request made.
70.1,70.2	Management of sensitive information.	No examples where material has been identified as culturally sensitive.
75.1,75.2,75.3	Minister request or updating strategies and plans.	Not requested.

4.5 Compliance

Table 3 lists the conditions that were found to be compliant and have ongoing auditing requirements. Detailed evidence is reported in the audit checklist (Appendix 1).

Table 3. Conditions found in Compliance for the current audit period.

Condition	Summary of Requirement	Audit Finding
5.2, 6.1, 7.1, 7.2, 7.3	Marine Shipping Management Plan	Addresses specified criteria
5.1, 10.2		Reviewed, revised, submitted and approved as specified
11.3		Implemented
16.2	Maintenance Dredge Management Plan	Addresses specified criteria
18.2		Implemented
19	Sea Dumping Permit Conditions 2-6, 9,11, 15, 17-19, 21, 22	Implemented
20.1, 20.2, 21.1, 22.1, 23.1, 24.1, 29.3, 30.1	Terrestrial Management Plan	Implemented
25.1 30.2		Reviewed, revised, submitted and approved as specified
25.2, 26.1, 27.1, 27.2, 27.3, 28.1		Addresses specified criteria
33.2, 35.1, 35.2, 35.3	Rehabilitation Strategy	Prepared to address specified criteria. Waiting for Minister approval.
34.1, 34.2		Rehabilitation works have commenced.

Condition	Summary of Requirement	Audit Finding
41.1 42.1 45.3	Traditional Owner consultation and employment opportunities	Traditional Owners were consulted during preparations of Management Plans and Strategies. Employment opportunities have been identified, as specified.
43.1, 44.1	Feral Pig Management Offset Strategy	Implemented
45.1, 45.2 46.1, 46.2 47.1		Addresses specified criteria
56.1, 56.4		Reported in accordance with the approved management plans
57.1, 57.2 58.1 59.1		Reports and plans published as required, with notification provided to department.
60.1, 60.2, 60.3, 60.4, 61.1, 62.1, 62.2	Independent peer reviews	Independent peer reviews completed as specified.
64.1, 65.1 72.1, 72.2	Submission and approval of Management Plans and Strategies	Plans submitted as specified.
67.1	Record keeping	Records kept, as specified.
68.1, 68.2, 68.3	Compliance reports	Published, as specified. Non-compliances reported, as specified.
69.1, 69.2, 69.3	Auditing	Conducted, as specified.
71.1, 71.2	Document register	A register outlining status of specified management plans and strategies is maintained and submitted as required.
74.1	Financial cost	Borne by approval holder.
76.1	Compliance with Management Plans and Strategies	Demonstrated throughout audit.

Appendix 1 Audit Criteria Checklist

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
TEMPORARY BARGE PLAN					
Condition 1 EPBC 2010/5642 <i>Unless agreed to by the Minister in writing, the approval holder must submit a Temporary Barge Plan to the Minister to manage, avoid and mitigate negative impacts to listed turtle species, including their breeding and foraging habitat, from the construction, operation and decommissioning of the temporary barge facility near Pera Head.</i>					
1.1	Temporary Barge Plan (TBP) must be submitted to the Minister and address construction, operation and decommissioning of the temporary barge facility.	EPBC 2016 Audit Report notes Temporary Barge Plan submitted.	Reviewed EPBC 2016 audit report during the 2019 audit	EPBC 2016 Audit Report	Compliance No further auditing required
1.2	Temporary Barge Plan must manage, avoid and mitigate negative impacts to listed turtle species, including their breeding and foraging habitat, from the construction, operation and decommissioning of the temporary barge facility near Pera Head.	EPBC 2016 Audit Report notes Temporary Barge Plan address all requirements relevant to the construction and operation of the temporary barge facility near Pera Head.	Reviewed EPBC 2016 audit report during the 2019 audit	EPBC 2016 Audit report	Compliance No further auditing required
Condition 2 EPBC 2010/5642 <i>The Temporary Barge Plan must include surveying to ascertain whether active, or potentially active, nests for the listed turtle species are present in the area to be impacted by the temporary barge facility.</i>					
2.1	The Temporary Barge Plan includes surveying to ascertain whether active, or potentially active, nests for the listed	EPBC 2016 Audit Report notes that the Temporary Barge Plan is designed to ensure that the area is surveyed prior to disturbance to determine whether	Reviewed EPBC 2016 audit report	EPBC 2016 Audit report	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	turtle species are present in the area to be impacted by the temporary barge facility.	active or potentially active listed turtle species nests are present.	during the 2019 audit		
Condition 3 EPBC 2010/5642 <i>The Temporary Barge Plan must include adaptive management and mitigation measures to benefit listed turtle species, including as identified in the Final Environmental Impact Statement. The Temporary Barge Plan must include and address effective management strategies to mitigate each potential impact to listed turtle species, desired outcomes, benchmarks, performance indicators and goals, timeframes for reporting and implementation, corrective actions and contingency measures, and responsibility for implementing actions.</i>					
3.1	The Temporary Barge Plan must include adaptive management and mitigation measures to benefit listed turtle species.	Temporary Barge Plan includes adaptive management and mitigation measures to benefit listed turtle species.	Reviewed EPBC 2016 audit report during the 2019 audit	EPBC 2016 Audit report	Compliance No further auditing required
3.2	The Temporary Barge Plan must include and address effective management strategies to mitigate each potential impact to listed turtle species, desired outcomes, benchmarks, performance indicators and goals, timeframes for reporting and implementation, corrective actions and contingency measures, and	Temporary Barge Plan documents effective management strategies to mitigate each potential impact to listed turtle species, desired outcomes, benchmarks, performance indicators and goals, timeframes for reporting and implementation, corrective actions and contingency measures, and specifies the roles with responsibility for implementing actions.	Reviewed EPBC 2016 audit report during the 2019 audit	EPBC 2016 Audit report	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	responsibility for implementing actions.				
Condition 4 EPBC 2010/5642 <i>The Temporary Barge Plan must be submitted to the Minister for approval. Commencement of the temporary barge facility must not occur until the Minister has approved the Temporary Barge Plan. The approved Temporary Barge Plan must be implemented.</i>					
4.1	The Temporary Barge Plan must be approved by the Minister prior to commencement of the temporary barge facility.	Temporary Barge Plan was approved by the Minister. No works in relation to the Temporary Barge Plan have commenced. A Temporary Barge was not constructed.	Reviewed EPBC 2016 audit report during the 2019 audit	EPBC 2016 Audit report	Compliance No further auditing required
4.2	The approved Temporary Barge Plan must be implemented.	EPBC 2019 audit confirmed that a Temporary Barge facility has not been constructed near Pera Heads. No works in relation to the TBP have been undertaken. There is no operational requirement for a temporary barge to be built. Therefore, implementation of the TBP is not applicable.	Reviewed EPBC 2019 audit report	EPBC 2016 Audit report	Not Applicable No further auditing required
MARINE AND SHIPPING MANAGEMENT PLAN					
Condition 5 EPBC 2010/5642 <i>The person taking the action must submit a Marine and Shipping Management Plan, covering all facets of the construction and operation of all marine related precincts for the South of Embley project including, but not limited to, the Boyd Port development, shipping activities, barge and ferry terminals, recreational use of beaches on Mining Lease (ML) 7024 by project workforce and the marine environment, anchoring, and underwater noise (excluding dredge management plans at condition 14 and condition 16) for the Minister's approval and must effectively define, avoid, manage and mitigate against impacts to the following matters of national environmental significance:</i> a. the outstanding universal value of the Great Barrier Reef World Heritage Property; b. Great Barrier Reef National Heritage Place; c. Great Barrier Reef Marine Park;					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
d. Listed turtle species; e. Listed dolphin species; and, f. Dugong (<i>Dugong dugon</i>) and Bryde's Whale (<i>Balaenoptera edeni</i>).					
5.1	Marine and Shipping Management Plan/s (MSMP) must be submitted for minister approval in accordance with condition 8.	Condition 8 allows for the Marine and Shipping MP to be submitted in stages. Stage i is the construction stage and Stage ii relates to operations. Stage iii relates to subsequent revisions of the MSMP. The Project has been operating in stage iii operations phase during the current audit period. EPBC 2016 audit found that the RTA Weipa SoE Project Construction Marine and Shipping Management Plan FINAL 19 November 2015 was submitted in accordance with Condition 8. EPBC 2019 audit found the RTA Weipa SoE Operations Marine and Shipping Management Plan dated 2 October 2018, was submitted in accordance with Condition 8. EPBC 2022 audit reported that a revised SoE Operations Marine and Shipping Management Plan was submitted in accordance with Condition 8. During the current audit period a further revision of the RTA Weipa SoE Operations Marine and Shipping Management Plan was approved by DCCEEW - letter dated 2 September 2024, based on submission 19 April 2024. Issued as R1C.	Reviewed EPBC 2016 audit report Reviewed EPBC 2019 audit report Reviewed EPBC 2022 audit report Email submission 19/4/2024 DCCEEW letter dated 2/9/2024 Interview Environment Superintendent	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report Correspondence to verify updated MSMP submitted for approval Interview	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
5.2	Marine and Shipping Management Plan/s prepared in accordance with condition 8 must effectively define, avoid, manage and mitigate against impacts to the following matters of national environmental significance: a. the outstanding universal value of the Great Barrier Reef World Heritage Property; b. Great Barrier Reef National Heritage Place; c. Great Barrier Reef Marine Park; d. Listed turtle species; e. Listed dolphin species; and, f. Dugong (<i>Dugong dugon</i>) and Bryde's Whale (<i>Balaenoptera edeni</i>).	EPBC 2016 audit found that the RTA Weipa SoE Project Construction Marine and Shipping Management Plan FINAL 19 November 2015 addressed requirements. EPBC 2019 audit and EPBC 2022 audits reported the RTA Weipa South of Embley Project Operations Marine and Shipping Management Plans (OMSMP) current at the time of audit addressed the requirements. The following evidence relates to the RTA Weipa SoE Project Operations Marine and Shipping Management Plan September 2024. Operations Marine and Shipping MP Section 1 outlines the purpose of the plan to address the relevant requirements of the EPBC Approval – these are listed (items a-f). It is noted that the Plan covers all marine based activities, including shipping, associated with the operations phase of the Project. It is noted that the purpose of the Plan is to define, avoid, manage and mitigate potential negative impacts of construction shipping on the MNES as listed in items (a) to (f). Section 5 notes that an overview of the profiles of MNES and previous survey efforts are provided in	Reviewed EPBC 2016 audit report Reviewed EPBC 2019 audit report Reviewed EPBC 2022 audit report Reviewed OMSMP September 2024	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report Evaluation of OMSMP September 2024 to verify impacts are defined and measures are described to avoid, manage and mitigate against impacts to items a-f	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Appendix A and references the EIS for more details. Locations of species are shown. Section 7 describes Potential Impacts, Avoidance, Mitigation and Management associated with the operations phase of the Project on MNES. This section covers requirements relating to: underwater vessel noise; prevention of marine pollution; spill management and response; vessel traffic management; vessel strike management; turbidity; marine pest prevention and response; and lighting management. Reference is made to the Foreshore Access Management Plan to restrict access for unpermitted persons to foreshore areas between Ina Creek and Winda Winda Creek.			
Condition 6 EPBC 2010/5642 <i>The Marine and Shipping Management Plan must incorporate avoidance and mitigation mechanisms for impacts to the outstanding universal value of the Great Barrier Reef World Heritage Property; Great Barrier Reef National Heritage Place: Great Barrier Reef Marine Park; Listed turtle species; Listed dolphin species; Dugong (Dugong dugon) and Bryde's Whale (Balaenoptera edeni), including but not limited to:</i> <i>a. impacts to the marine environment that supports the above listed species traversing, foraging and/or breeding habitat including, seagrass, reefs and corals, listed turtle species nesting and/or foraging habitat;</i> <i>b. impacts from changes to coastal processes, including beach and/or shore erosion from the Boyd Port development, barge facilities and/or ferry facilities and ensure the action does not alter the beach gradients to such an extent that listed turtle species are prevented from and/or impeded in accessing the beach foreshore to nest or listed turtle species hatchlings are prevented and/or impeded from entering the marine environment;</i> <i>c. artificial light related impacts on listed turtle species (including hatchlings) nesting beaches and adjacent marine environment including, but not limited to, lighting from Boyd Port construction and operation, shipping, temporary passenger landing and barge facility between Pera Head and Boyd Bay, and anchored/moored vessels (but excludes operations within the Hey and Embley Rivers);</i>					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		<i>d. measures to ensure shipping activities are undertaken in accordance with the Great Barrier Reef Marine Park Zoning Plan (2003), or its most current version;</i> <i>e. mechanisms to implement best practice mitigation and management measures for ship loading and unloading, and all other aspects of shipping activities to minimise impacts on the marine environment (including bauxite and/or other contamination spills);</i> <i>f. impacts from vessel strike to listed turtle species, listed dolphin species or Dugongs including, but not limited to, restricting vessel speed limits to 6 knots in water depths of 2.5 metres or less; and, implementation of a transit lane in the Hey River and Embley River that follows the greatest water depths;</i> <i>g. impacts from underwater noise including, but not limited to, pile driving activities at Condition 12 and shipping;</i> <i>h. measures that minimise the risk of introduced marine pest species over the life of the project, including ballast water management. The marine pest monitoring program must be consistent with the Department of Agriculture, Fisheries and Forestry's Australian Marine Pest Monitoring Manual (version 2.0), or its most current version;</i> <i>i. impacts associated with recreational use by project employees of listed turtle species nesting habitat (including, but not limited to, implementation of a permit access system for the employees);</i> <i>j. if agreed by the department in writing, requirements of condition 1 to condition 4 may be incorporated into the Marine and Shipping Management Plan;</i> <i>k. impacts identified in the Environmental Management Plan Outlines at Appendix 7-E (Threatened estuarine and Marine species); Appendix 9-A (Non-avian Migratory Species); Appendix 11-A (Great Barrier Reef Marine Park, World Heritage Area and National Heritage Place); and, Appendix 10A (Commonwealth Marine Area) in the Final Environmental Impact Statement; and,</i> <i>l. mechanisms to notify the department in writing within five (5) business days of any confirmed or suspected sighting/s and/or observation/s in the marine environment in and/or around the project area of the Dwarf Sawfish (Pristis clavata); Green Sawfish (Pristis zijsron); Freshwater Sawfish (Pristis microdon); or the Speartooth Shark (Gyphis sp. A).</i>			
6.1	Marine and Shipping Management Plan/s prepared in accordance with condition 8 must incorporate avoidance and mitigation mechanisms addressing a. through l.	EPBC 2019 audit report stated that the RTA Weipa SoE Project Operations Marine and Shipping Management Plan FINAL 2 October 2018 (Operations MSMP) was prepared in accordance with Condition 6.1. EPBC 2022 audit report confirmed RTA Weipa SoE Project Operations Marine and Shipping Management Plan April 2021 (dated 28/4/2021, approved by DoE	Reviewed EPBC 2019 audit report Reviewed EPBC 2022 audit report Reviewed Operations	EPBC 2019 audit report EPBC 2022 audit report Evaluation of revised Operations MSMP	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		6/7/21) was prepared in accordance with Condition 6.1. The evidence listed below 6.1(a) – (l) relates to RTA Weipa SoE Project Operations Marine and Shipping Management Plan September 2024 (dated 2/9/2024, approved by DCCEEW 2/9/24).	MSMP September 2024 to ensure items a-l are addressed. Interview Environment Superintendent	September 2024 Interview	
a	impacts to the marine environment that supports the above listed species traversing, foraging and/or breeding habitat including, seagrass, reefs and corals, listed turtle species nesting and/or foraging habitat;	Operations Marine and Shipping MP Section 7 specifies the requirement to implement measures to address operational shipping and marine activities that could have an impact on the marine environment that support marine species covered by the Plan including traversing, foraging and/or breeding habitat including, seagrass, reefs and corals, listed turtle species nesting and/or foraging habitat.	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to impacts to the marine environment	Compliance
b	impacts from changes to coastal processes, including beach and/or shore erosion from the Boyd Port development, barge facilities and/or ferry facilities and ensure the action does not alter the beach gradients to such an extent that listed turtle species are prevented from and/or impeded in	Operations Marine and Shipping MP Section 6.6 specifies the requirement to implement measures to address impacts associated with changes to coastal processes. The Chith Export Facility is a piled jetty and wharf structure with six piles on the beach/foreshore area and a small dredged footprint approximately 500m from the shoreline. Risk was assessed as negligible and no further mitigation mechanisms are required to address potential changes to coastal processes.	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to impacts from changes to coastal processes	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	accessing the beach foreshore to nest or listed turtle species hatchlings are prevented and/or impeded from entering the marine environment;				
c	artificial light related impacts on listed turtle species (including hatchlings) nesting beaches and adjacent marine environment including, but not limited to, lighting from Boyd Port construction and operation, shipping, temporary passenger landing and barge facility between Pera Head and Boyd Bay, and anchored/moored vessels (but excludes operations within the Hey and Embley Rivers);	Operations Marine and Shipping MP Section 7.4 details the measures to address artificial light related impacts on listed turtle species (including hatchlings) nesting beaches and adjacent marine environment. These measures include: light design, direction of light emission, location, shielding requirements and restrictions in the use of light particularly during peak turtle nesting season. Monitoring of impact of light is to be conducted and an offset management program for marine turtles including feral pig control has been implemented.	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to artificial light	Compliance
d	measures to ensure shipping activities are undertaken in accordance with the Great Barrier Reef Marine Park Zoning Plan (2003), or its most current version;	Operations Marine and Shipping MP Section 7.1.4 specifies the requirement to implement measures to ensure shipping activities are undertaken in accordance with the Great Barrier Reef Marine Park Zoning Plan (2003) and defines Designated Shipping Areas. Contractual arrangements are in place to ensure compliance with the regulatory requirements for shipping through the GBRMP Act and AMSA, MSQ and international requirements.	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to shipping activities	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
e	mechanisms to implement best practice mitigation and management measures for ship loading and unloading, and all other aspects of shipping activities to minimise impacts on the marine environment (including bauxite and/or other contamination spills);	Operations Marine and Shipping MP Section 7.3 covers prevention of marine pollution and includes practices relating to shipping activities to minimise impact on the marine environment. These include: vessel discharge protocols, waste management, spills prevention and management, and Chith Export Facility bauxite spillage management.	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to ship loading and unloading	Compliance
f	impacts from vessel strike to listed turtle species, listed dolphin species or Dugongs including, but not limited to, restricting vessel speed limits to 6 knots in water depths of 2.5 metres or less; and, implementation of a transit lane in the Hey River and Embley River that follows the greatest water depths;	Operations Marine and Shipping MP Section 7.1.1 specifies the requirement to implement measures to reduce the risk of impacts from vessel strike on listed turtle species, listed dolphin species or Dugongs. These include training requirements for vessel masters and crew; provision of lookouts for marine fauna; restricting vessel speed limits to a maximum of six knots in water depths of 2.5m or less; vessel tracking systems; inspections and monitoring.	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to vessel strike	Compliance
g	impacts from underwater noise including, but not limited to, pile driving activities at Condition 12 and shipping;	Operations Marine and Shipping MP Section 7.1.2 specifies the requirement to implement such as maintenance, restricting speed and management of operation of vessel engines, transit route, qualified vessel crew, review of vessels prior to contracting to	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to underwater noise	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		ensure AMSA and MSQ requirements for operation to mitigate underwater noise from vessels. No pile driving activities have been conducted nor are planned during operations.	Interview Environment Superintendent		
h	measures that minimise the risk of introduced marine pest species over the life of the project, including ballast water management. The marine pest monitoring program must be consistent with the Department of Agriculture, Fisheries and Forestry's Australian Marine Pest Monitoring Manual (version 2.0), or its most current version;	Operations Marine and Shipping MP Section 7.2 - requires application, maintenance and certification of antifouling coating; marine pest risk assessments; inspections and cleaning for vessels rated above a low risk; compliance with the Australian Anti-fouling and In-water Cleaning Guidelines; and compliance with any DAF requirements to mitigate the risk of marine pests. The settlement plate program is described. Marine pest inspections and actions in the event of an incursion are detailed. Ongoing consultation with DAF Biosecurity Queensland is required to ensure the monitoring program is consistent with other Ports and the the current version of the Department of Agriculture, Fisheries and Forestry's Australian Marine Pest Monitoring Manual.	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to marine pest species	Compliance
i	impacts associated with recreational use by project employees of listed turtle species nesting habitat (including, but not limited to, implementation of a permit	Marine and Shipping MP Section 7.5 addresses the restriction of access for unpermitted persons to foreshore areas between Ina Creek and Winda Winda Creek. A Foreshore Access Management Plan has been developed.	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to recreational use	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	access system for the employees);	This plan details access for the duration of the Project including recreational activities and specifies the requirement to prevent impacts to turtles and their nesting habitats. Rules for access are specified. The foreshore access permit system is described.			
j	if agreed by the department in writing, requirements of condition 1 to condition 4 may be incorporated into the Marine and Shipping Management Plan;	Not applicable - Temporary Barge Plan prepared to address requirements. Temporary barge not constructed and not required. See notes associated with conditions 1 – 4.	EPBC 2016 Audit Report	EPBC 2016 Audit report provided evaluation of the TBP	Not Applicable No further auditing required
k	impacts identified in the Environmental Management Plan Outlines at Appendix 7-E (Threatened estuarine and Marine species); Appendix 9-A (Non-avian Migratory Species); Appendix 11-A (Great Barrier Reef Marine Park, World Heritage Area and National Heritage Place); and, Appendix 10A (Commonwealth Marine Area) in the Final Environmental Impact Statement; and,	Operations Marine and Shipping MP Section 6 identifies the potential impacts to shipping activities during the operations phase and provides an assessment of risk. Mitigation measures are described and further detailed in Section 7. These are consistent with those proposed in the EIS (RTA Weipa, March 2013) as they relate to shipping activities and as a minimum reflect the proposed measures for threatened estuarine and marine species (Appendix 7-E), migratory species (Appendix 9-A); the GBRWHP and GBRNHP (Appendix 11-A); and the GBRMP (Appendix 10- A).	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to impacts identified in Final EIS, as described	Compliance
l	mechanisms to notify the department in writing within	Marine and Shipping MP Section 3.6 Table 3 and section 7.6 states confirmed sighting of an	Reviewed Operations	Evaluation of Operations	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	five (5) business days of any confirmed or suspected sighting/s and/or observation/s in the marine environment in and/or around the project area of the Dwarf Sawfish (<i>Pristis clavata</i>); Green Sawfish (<i>Pristis zijsron</i>); Freshwater Sawfish (<i>Pristis microdon</i>); or the Speartooth Shark (<i>Giyphis</i> sp. A).	elasmobranch is to be reported within 5 business days of sighting. This includes: Dwarf Sawfish (<i>Pristis clavata</i>); Green Sawfish (<i>Pristis zijsron</i>); Freshwater Sawfish (<i>Pristis microdon</i>); or the Speartooth Shark (<i>Giyphis</i> sp. A).	MSMP September 2024	MSMP relating to notification to department for listed sightings	
Condition 7 EPBC 2010/5642 <i>The Marine and Shipping Management Plan must also include adaptive management strategies to benefit the outstanding universal value of the Great Barrier Reef World Heritage Property; Great Barrier Reef National Heritage Place; Great Barrier Reef Marine Park; listed turtle species, listed dolphin species, Dugong and Bryde's Whale. The Marine and Shipping Management Plan must include and address effective management strategies to mitigate each potential impact, desired outcomes, benchmarks, readily measureable performance indicators and goals, timeframes for reporting and implementation, corrective actions and contingency measures, and specify the persons/ roles with responsibility for implementing actions. The Marine and Shipping Management Plan must provide information detailing Traditional Owner opportunities for employment, and mechanisms for reporting the number of local indigenous person/s actually employed in the implementation of this Plan (consistent with condition 42).</i>					
7.1	Marine and Shipping Management Plan/s prepared in accordance with condition 8 must include adaptive management strategies to benefit the outstanding universal value of the Great Barrier Reef World Heritage Property; Great Barrier Reef National Heritage Place; Great	RTA Weipa SoE Project Operations Marine and Shipping Management September 2024 (Operations Marine and Shipping MP). Adaptive management strategies are included in Sections 6 and 7, as detailed under Condition 6 noted in this checklist.	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to adaptive management strategies	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	Barrier Reef Marine Park; listed turtle species, listed dolphin species, Dugong and Bryde's Whale.				
7.2	The Marine and Shipping Management Plan/s prepared in accordance with condition 8 must include and address effective management strategies to mitigate each potential impact, desired outcomes, benchmarks, readily measurable performance indicators and goals, timeframes for reporting and implementation, corrective actions and contingency measures, and specify the persons/ roles with responsibility for implementing actions.	Operations Marine and Shipping MP Section 7, Table 13 summarises an action plan to implement the mitigation measures identified in sections 6 and 7. Each action plan includes: the potential impact; avoidance, mitigation and management measures; monitoring requirements; residual risk; management objective/goal/targets; performance indicators; timeframe (activity); corrective actions and contingency measures; and responsibilities.	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to management strategies	Compliance
7.3	The Marine and Shipping Management Plan/s prepared in accordance with condition 8 must provide information detailing Traditional Owner opportunities for employment, and mechanisms for reporting	Operations Marine and Shipping MP Section 8 details Traditional Owner employment opportunities associated with marine works and shipping in relation to the Feral Pig Management Offset Strategy; Foreshore Access Permit System; and Inshore Dolphin Offset Strategy. In addition, through the existing Indigenous Land Use Agreement, opportunities for	Reviewed Operations MSMP September 2024	Evaluation of Operations MSMP relating to Traditional Owners	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	the number of local indigenous person/s actually employed in the implementation of this Plan (consistent with condition 42).	employment of Traditional Owners are identified through an employment and training plan. Section 7 provides examples of Traditional Owner employment within the Land and Sea Management Program such as looking for Asian green mussels during beach works and conduct of beach surveys.			
Condition 8 EPBC 2010/5642 <i>The Marine and Shipping Management Plan may be submitted to the Minister in the following stages, but the respective stages must not commence until the Minister has approved each respective version of the plan:</i> <i>i an initial plan related to impacts associated with construction activities, other than Preliminary Works and the pile driving operations carried out in accordance with condition 12 to condition 13;</i> <i>ii a subsequent plan to also reflect impacts associated with operations on the outstanding universal value of the Great Barrier Reef World Heritage Property; Great Barrier Reef National Heritage Place and Great Barrier Reef Marine Park; and,</i> <i>iii subsequent revisions in accordance with condition 10.</i>					
8.1	A Marine and Shipping Management Plan for stage i. must be approved by the Minister prior to commencement of stage i.	EPBC 2016 Audit report confirmed that the RTA Weipa SoE Project Construction Marine and Shipping Management Plan FINAL 19 November 2015 was approved prior to construction. Construction activities have been completed. Verified via EPBC 2019 audit report.	Reviewed EPBC 2016 audit report Reviewed EPBC 2019 audit report	EPBC 2016 Audit report EPBC 2019 Audit report	Compliance No further auditing required
8.2	A Marine and Shipping Management Plan for stage ii. must be approved by the Minister prior to commencement of stage ii.	RTA Weipa South of Embley Project Operations Marine and Shipping Management Plan FINAL dated 2 October 2018 covers operations – Stage ii.	Reviewed EPBC 2019 audit report	EPBC 2019 Audit Report	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		EPBC 2019 audit report confirms that the Operations MSMP was approved by the Minister prior to commencement of operations (2/12/18).			
8.3	A Marine and Shipping Management Plan for stage iii must be approved by the Minister prior to commencement of stage iii.	Stage iii relates to subsequent revisions of RTA Weipa South of Embley Project Operations Marine and Shipping Management Plan FINAL dated 2 October 2018. A subsequent revision of the MSMP was submitted 18 February 2021, with final responses provided to the Minister 27 April 2021. Operations MSMP April 2021 was approved by the Minister 6 July 2021. Reviewed during 2022 EPBC audit.	Reviewed EPBC 2022 audit report	EPBC 2022 Audit Report	Compliance No further auditing required
Condition 9 EPBC 2010/5642 <i>The subsequent Marine and Shipping Management Plan at condition 5 must be developed in consultation with relevant Commonwealth agencies, including the Australian Maritime Safety Authority and the Great Barrier Reef Marine Park Authority, and state agencies, including Maritime Safety Queensland.</i>					
9.1	The subsequent Marine and Shipping Management Plan at condition 8 stage ii must be developed in consultation with relevant Commonwealth agencies, including the Australian Maritime Safety Authority and the Great Barrier Reef Marine Park Authority, and state agencies, including Maritime Safety Queensland.	EPBC 2022 audit report confirmed the Operations Marine and Shipping Management Plan dated April 2021 section 10 Table 14 noted that the comments and RTA Weipa response to the Commonwealth agencies including the Australian Maritime Safety Authority and the Great Barrier Reef Marine Park Authority, and state agencies, such as Maritime Safety Queensland.	Reviewed EPBC 2022 audit report	EPBC 2022 audit report	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
Condition 10 EPBC 2010/5642 <i>Within two (2) years of operations commencing, the Marine and Shipping Management Plan must be reviewed, revised and submitted to the Minister for approval. The Marine and Shipping Management Plan must be reviewed, revised and submitted to the Minister for approval every three (3) years for the next nine (9) years and, unless otherwise agreed by the Minister in writing every five (5) years thereafter for the life of the project.</i>					
10.1	The Marine and Shipping Management Plan at condition 8, stage ii. must be reviewed, revised and submitted to the Minister for approval within two (2) years of operations commencing.	RTA Weipa South of Embley Project Operations Marine and Shipping Management Plan dated 28 April 2021. A subsequent revision of the Marine and Shipping Management Plan was submitted 18 February 2021, with final responses provided to the Minister 27 April 2021. Operations MSMP was approved by the Minister 6 July 2021. It was reported in the EPBC 2022 audit report that the submission date was not within the two years of operations commencing, as specified by Condition 10.1. It was advised that this administrative oversight was identified on 16 December 2020 and the Department was notified on the same day of this non-compliance. Discussions with the Department (P.Patel) established a February 2021 submission date. It is noted that the revision of the MSMP was submitted 18 February 2021. The non-compliance raised in the EPBC 2022 audit was reported as actioned and closed out, fulfilling the requirements of Condition 10.1 to the Minister's satisfaction.	Reviewed EPBC 2022 audit report	EPBC 2022 audit report	Compliance No further auditing required
10.2	The Marine and Shipping Management Plan at condition 8, stage ii. must be reviewed, revised and submitted to the Minister for approval every	The previous version of the Marine and Shipping Management Plan was dated April 2021. Current version was submitted to DCCEEW 19 April 2024, three years from the MSMP date.	Interview Environment Superintendent	Interview Review Operations MSMP	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	three (3) years for the next nine (9) years and, unless otherwise agreed by the Minister in writing every five (5) years thereafter for the life of the project.	Email sent to DCCEEW notes that the updates to the document are grammatical, reference “administering authority”, rather than department names; and update table numbering. Word version showing tracked changes and memo summarising changes was provided. Letter response from DCCEEW dated 2/9/24 confirming acceptance of updated MSMP – issued as R1C.	Operations MSMP Email to DCCEEW dated 19/4/24 DCCEEW letter dated 2/9/24	Correspondence to verify updated MSMP submitted to DoE for approval	
Condition 11 EPBC 2010/5642 <i>The approved Marine and Shipping Management Plan/s must be implemented.</i>					
11.1	The approved Marine and Shipping Management Plan at condition 8, stage i. must be implemented for stage i.	EPBC 2016 and 2019 audit reports confirm that the Construction Marine and Shipping Management Plan was well implemented. Construction activities have finished. Operations commenced 2 December 2018. The MSMP at condition 8, stage i is not applicable to the current audit period. No further auditing is required.	Reviewed EPBC 2016 audit report Reviewed EPBC 2019 audit report	EPBC 2016 audit report EPBC 2019 audit report	Compliance No further auditing required
11.2	The approved Marine and Shipping Management Plan at condition 8, stage ii. must be implemented for stage ii.	Shipping Management Plan dated April 2021, relevant to stage ii. The Project operated in stage iii operations phase during the current audit period. EPBC 2022 audit report confirmed the implementation of the RTA Weipa South of Embley	Reviewed EPBC 2022 audit report	EPBC 2022 audit report	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Project Operations Marine and Shipping Management Plan dated 28 April 2021.			
11.3	The approved Marine and Shipping Management Plan at condition 8, stage iii. must be implemented for stage iii.	“Sara” vessel continues to be in use since 2022 EPBC audit. Inspection conducted by Environmental Superintendent 18/3/2025. Confirmed AMSA and MARPOL requirements. The Sara IMO No 9854818 Docking Completion Report. Special Survey No. 1 – Docking 22/8/2024 – 10/12/2024, scheduled servicing, testing/inspection and maintenance throughout vessel reported – well detailed. Conducted at TRS Shipyard, Cairns. Sludge and oily water removed, coolant drained - disposed on shore at Cairns. Underwater hull blasted and painted, as required. Waste tracked. Remondis receipts. Confirmation waste is disposed of on shore and separated via the waste management plan requirements. Bunkering checklist e.g. 18/3/25 – transfer of oil. JSEA’s signed. Toolbox meeting records e.g. 18/3/25 – JSEA bunker / fuel transfer.	Waste records Oil record book Bunkering records Maintenance records Inspection records Training records Docking Completion Report Interview Environment Superintendent	Interviews Sample of records provided	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Jobs programmed via maintenance scheduling system (Marad) covering maintenance requirements relating to equipment, engines, generator, deck, hull. Sighted records inspect and test. Waste records stored in MARAD e.g. 12/3/25. Sewage disposal records e.g. 23/12/24 – 12/3/25. Oil record book e.g records 30/7/24 – 3/9/24. Marine Pest risk assessment conducted prior to mobilisation – no change since 2022 EPBC audit. Equipment delivery Marine Pest Risk Assessment completed 6/6/24. Barge marine pest risk assessment 8/6/24. Anti-fouling certificate 1/2/22.			

PILE DRIVING OPERATIONS

Condition 12 EPBC 2010/5642

The approval holder must ensure that the following measures related to any pile driving operations are implemented to minimise the impacts of underwater noise and disturbance on the following listed threatened species and/or listed migratory species:

- iv. Listed turtle species;*
- v. Listed dolphin species; and*
- vi. Dugong (Ougong dugan) and Bryde's Whale (Balaenoptera edeni). Those measures must include:*

- a. pile driving operations must implement soft start procedures. The soft start procedures must not commence until the above listed species are observed to leave the exclusion zone/s or are not observed in the exclusion zone/s for at least 30 minutes;*
- b. observations for the above listed species must be undertaken over the observation zone by a suitably qualified marine observer, for at least 30 minutes before the commencement of pile driving operations, and during pile driving operations;*
- c. the exclusion zone must be no less than 100 metres from the pile driving operations and be implemented so as to ensure that the above listed species are not exposed to sound exposure levels of greater than or equal to 183 dB re 1µ Pa2 s;*

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	<i>d. pile driving operations must cease if the species listed above are observed within the exclusion zone, and action to cease all pile driving operations within the exclusion zone must be taken within two minutes of the observation, or as soon as possible, if it is unsafe to cease pile driving operations within two minutes. Every 30 days during periods when pile driving operations are occurring, the approval holder must report the number of incidents where pile driving operations did not cease within two minutes;</i> <i>e. pile driving operations must not recommence until the species listed above observed within the exclusion zone are observed to leave the exclusion zone or are not observed to leave the exclusion zone for at least 30 minutes: and,</i> <i>f. only pile driving operations which have commenced prior to sunset or prior to a period of low visibility can continue between the hours of sunset and sunrise, unless pile driving operations are suspended for more than 15 minutes.</i>				
12.1	Measures a. through f. must be implemented for any pile driving operations.	No pile driving works occurred within the current audit period. This was confirmed by the Environment Superintendent.	Interview Environment Superintendent	Interview Determine if pile driving operations have occurred	Not Applicable
a	pile driving operations must implement soft start procedures. The soft start procedures must not commence until the above listed species are observed to leave the exclusion zone/s or are not observed in the exclusion zone/s for at least 30 minutes;	No pile driving works occurred within the current audit period.	Interview Environment Superintendent	Interview	Not Applicable
b	observations for the above listed species must be undertaken over the observation zone by a suitably	No pile driving works occurred within the current audit period.	Interview Environment Superintendent	Interview	Not Applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	qualified marine observer, for at least 30 minutes before the commencement of pile driving operations, and during pile driving operations;				
c	the exclusion zone must be no less than 100 metres from the pile driving operations and be implemented so as to ensure that the above listed species are not exposed to sound exposure levels of greater than or equal to 183 dB re 1µPa ² s;	No pile driving works occurred within the current audit period.	Interview Environment Superintendent	Interview	Not Applicable
d	pile driving operations must cease if the species listed above are observed within the exclusion zone, and action to cease all pile driving operations within the exclusion zone must be taken within two minutes of the observation, or as soon as possible, if it is unsafe to cease pile driving operations within two minutes. Every 30 days during periods when pile driving operations are occurring, the approval holder	No pile driving works occurred within the current audit period.	Interview Environment Superintendent	Interview	Not Applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	must report the number of incidents where pile driving operations did not cease within two minutes;				
e	pile driving operations must not recommence until the species listed above observed within the exclusion zone are observed to leave the exclusion zone or are not observed to leave the exclusion zone for at least 30 minutes;	No pile driving works occurred within the current audit period.	Interview Environment Superintendent	Interview	Not Applicable
f	only pile driving operations which have commenced prior to sunset or prior to a period of low visibility can continue between the hours of sunset and sunrise, unless pile driving operations are suspended for more than 15 minutes.	No pile driving works occurred within the current audit period.	Interview Environment Superintendent	Interview	Not Applicable
QUALIFIED MARINE OBSERVER Condition 13 EPBC 2010/5642 <i>The criteria for a suitably qualified marine observer at condition 12b must be submitted to the Minister for approval and records must be kept of marine observers subsequently engaged. Pile driving operations cannot commence until the criteria has been approved.</i>					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
13.1	Criteria for a suitably qualified marine observer must be submitted to the Minister and approved prior to pile driving operations commencing.	No pile driving works occurred within the current audit period.	Interview Environment Superintendent	Interview	Not Applicable
13.2	Records must be kept of marine observers subsequently engaged for any pile driving operations.	No pile driving works occurred within the current audit period.	Interview Environment Superintendent	Interview	Not Applicable
DREDGING MANAGEMENT PLANS					
Condition 14 EPBC 2010/5642 <i>The approval holder must submit to the Minister for approval a Capital Dredging Management Plan/s for capital dredging activities associated with the South of Embley project. The Capital Dredging Management Plan/s must be prepared in accordance with the Australian Government National Assessment Guidelines for Dredging (2009), or their most current versions, to avoid and mitigate impacts on:</i> i. Commonwealth Marine Area; ii. Listed turtle species; iii. Listed dolphin species; and, iv. Dugong (<i>Dugong dugon</i>) and Bryde's Whale (<i>Balaenoptera edeni</i>).					
14.1	Capital Dredging Management Plan/s for capital dredging activities associated with the South of Embley project must be submitted to the minister for approval.	EPBC 2016 audit report noted the approval of the Dredge Management Plan – Port (Initial Capital Dredging). EPBC 2016 audit report noted the approval of the Capital Dredge Management Plan – River Facilities. No capital dredging occurred during the current audit period.	Reviewed EPBC 2016 audit report Interview Environment Superintendent	EPBC 2016 audit report	Not Applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
14.2	Capital Dredging Management Plan/s must include measures to avoid and mitigate impacts on: i. Commonwealth Marine Area; ii. Listed turtle species; iii. Listed dolphin species; and, iv. Dugong (<i>Dugong dugon</i>) and v. Bryde's Whale (<i>Balaenoptera edeni</i>).	EPBC 2016 audit report noted that the Capital Dredge Management Plans included measures to avoid and mitigate impacts on listed species. EPBC 2019 audit report notes that Capital Dredging has ceased. EPBC 2025 audit confirms no capital dredging occurred within the audit period.	Reviewed EPBC 2016 audit report Reviewed EPBC 2019 audit report Interview Environment Superintendent	EPBC 2016 audit report EPBC 2019 audit report Interview	Not Applicable
Condition 15 EPBC 2010/5642 <i>Capital dredging activities cannot commence until the Capital Dredging Management Plan at condition 14 has been approved.</i>					
15.1	Capital Dredging Management Plan at condition 14 must be approved prior to commencing capital dredging activities.	EPBC 2016 audit report noted that both Capital Dredging Management Plans were approved by DoE prior to commencing capital dredging activities. EPBC 2025 audit confirms no capital dredging occurred within the audit period.	Reviewed EPBC 2016 audit report Interview Environment Superintendent	EPBC 2016 audit report Correspondence showing evidence of approval for DMP-Port and DMP-River prior to commencement of dredging.	Not Applicable
Condition 16 EPBC 2010/5642 <i>The approval holder must submit to the Minister for approval a Maintenance Dredging Management Plan/s for all maintenance dredging activities associated with the South of Embley Project. The Maintenance Dredging Management Plan/s must be prepared in accordance with the Australian Government National Assessment Guidelines for Dredging (2009) and the department's Long-Term Monitoring and Management Plan Requirements for 10</i>					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
<i>year Permits to Dump Maintenance Dredge Material at Sea (July 2012), or their most current versions, to avoid and mitigate impacts for the matters of national environmental significance listed at condition 14.</i>					
16.1	Maintenance Dredging Management Plan/s for all maintenance dredging activities associated with the South of Embley Project must be submitted to the minister for approval.	EPBC 2019 Audit report noted Maintenance Dredging Management Plan – Port March 2018. Letter to DoEE submitting the Maintenance Dredging Management Plan – Port together with the peer review dated 25/11/2017. Email from DoEE dated 9/3/18 noting comments have been adequately addressed and requesting RTAW to submit final version for approval. Letter from DoEE dated 15/3/2018 approving the Maintenance Dredging Management Plan – Port March 2018. EPBC 2022 Audit report noted Dredge Management Plan – Port (Maintenance Dredging) June 2019 submitted to DoEE 14/6/2019 for review. Approved by DoEE 18/6/2019. Amrun Port and River Facilities Long-Term Maintenance Dredge Management Plan (LMDMP) 2021 – 2031 submitted 3/9/2020 via email. Letter from DAWE dated 3/2/2021 approving the Long-Term Maintenance Dredge Management Plan. Amrun Port and River Facilities Long-Term Maintenance Dredge Management Plan (LMDMP)	EPBC 2019 Audit Report EPBC 2022 Audit Report Interview Environment Superintendent	EPBC 2019 audit report EPBC 2022 audit report Interview	Compliance Not applicable to current audit period

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		2021 – 2031 dated 4 February 2021 is the current Maintenance Dredge Management Plan. No new maintenance dredging management plans were submitted during the current audit period.			
16.2	Maintenance Dredging Management Plan/s must include measures to avoid and mitigate impacts on: i. Commonwealth Marine Area; ii. Listed turtle species; iii. Listed dolphin species; and, iv. Dugong (Dugong dugon) and Bryde's Whale (Balaenoptera edeni).	EPBC 2019 and EPBC 2022 audit reports noted that the relevant Maintenance Dredging Management Plans included management measures to address potential impacts to marine turtles and marine mammals. These include fitting turtle exclusion devices, employing trained Marine Fauna Observers, logging sightings, employing procedures to avoid interaction with marine turtles and marine mammals, and management of impacts created by artificial light on turtles. Specified threatened marine mammals, which include the listed turtle and dolphin species, dugongs and Bryde's whale were listed. Amrun Port and River Facilities Long-Term Maintenance Dredge Management Plan (LMDMP) 2021 – 2031 dated January 2021. Section 9.2 notes a works specific Environmental Management Plan will be developed for annual dredging activities and this will include adaptive management measures relating to marine fauna. Management actions are listed to reduce the risk of impacting turtles and specify requirements to delay works until any sighted whales, dugongs, sawfish, marine turtles and dolphins have left the monitoring zone.	Reviewed EPBC 2019 audit report Reviewed EPBC 2022 audit report Interview Environment Superintendent	EPBC 2019 audit report EPBC 2022 audit report Interview to confirm status of LMDMP	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
Condition 17 EPBC 2010/5642 <i>Maintenance dredging activities cannot commence until the Maintenance Dredging Management Plan at condition 16 has been approved.</i>					
17.1	Maintenance Dredging Management Plan at condition 16 must be approved prior to maintenance dredging activities commencing.	2019 EPBC audit found Maintenance Dredging Management Plan – Port March 2018 was approved 15/3/2018 by DoEE; with maintenance dredging first conducted 1-4/5/2018. Maintenance dredging conducted during the audit period was 15,16,28,29 June 2019 only. Maintenance Dredging Management Plan – Port was updated June 2019. Approved 18/6/19. Administrative changes only. EPBC 2022 audit Amrun Port and River Facilities Long-Term Maintenance Dredge Management Plan (LMDMP) 2021 – 2031 submitted 3/9/2020 and approved 3 February 2021.	Reviewed 2019 EPBC audit report Reviewed 2022 EPBC audit report	EPBC 2019 audit report EPBC 2022 audit report	Compliance Not applicable to current audit period
Condition 18 EPBC 2010/5642 <i>The approved Plans at condition 14 and condition 16, and/or their subsequent revisions, must be implemented.</i>					
18.1	The approved Capital Dredge Management Plan/s must be implemented in relation to capital dredge activities.	The Capital Dredging campaign was conducted 26/3 – 19/4 2016. Evidence of implementation of the approved Capital Dredge Management Plan was verified during the 2016 EPBC audit. Monitoring and report requirement specified in the Capital Dredge Management Plan were reviewed	Reviewed 2016 EPBC audit report	Reviewed 2016 EPBC audit report	Not Applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		during this audit and found to be in compliance with the requirements specified. No capital dredging occurred in the audit period. Capital dredging has been completed.			
18.2	The approved Maintenance Dredge Management Plan/s must be implemented in relation to maintenance dredge activities.	Maintenance dredging campaigns during the current audit period were undertaken: 23-25/5/2022 9-11/5/2023 12-14/5/2024 Evidence of implementation of the Amrun Port and River Facilities Long-Term Maintenance Dredge Management Plan (LMDMP) 2021 – 2031 dated February 2021 is documented in the checklist relating to Sea Dumping Permit SD2020/3999 (see below). In terms of implementation, all relevant items confirming compliance with the approved maintenance Dredge Management Plan (LMDMP) were verified. No items were identified that indicated that relevant actions required by the LMDMP had not been undertaken.	Daily dredging records Refer to SD Permit records 2020/3999 Interview Environment Superintendent	Review evidence of implementation of the LMDMP Interview	Compliance
Condition 19 EPBC 2010/5642 <i>The approval holder must comply with the requirements of any permits obtained under the Environment Protection (Sea Dumping) Act 1981, including any conditions attached to the permit/s.</i> NOTE: Applicable sea dumping permit for the current audit period: 2020/3999.					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
General Sea Dumping Permit 2020/3999 dated 20 January 2021 Permit to load for the purposes of dumping, and to dump, up to 480,000 cubic metres (<i>in situ</i>) of dredged material derived from maintenance dredging of the Amrun Port and River Facilities commencing on the date of signature of this permit and extending until 31 January 2031, subject to conditions which are specified in Appendices 1 and 2. <u>Note:</u> RTA Weipa Pty Ltd Long-Term Maintenance Dredge Management Plan – 2021 – 2031 dated February 2021 applies for this Sea Dumping Permit.					
1	Except so far as the contrary intention appears, terms used in the conditions to this permit have the same meaning as such terms in the Act.	No action required. Dredge campaigns for each year: 23-25/5/2022 9-11/5/2023 12-14/5/2024			No action required.
2	RTAW must ensure that no more than 480,000 cubic metres (<i>in situ</i>) of material derived from maintenance dredging of the Amrun Berth Pocket and Departure Channel as specified in the Application, is loaded and dumped.	Bathymetric report confirms total dredged volume for the period covered by SD 2020/3999 was: 2022 - 29,000 cubic metres 2023 – 34,600 cubic metres 2024 - 51,316 cubic metres 2024 bathymetric report states this is the third year of dredging under the current SD permit 2020/3999 with a total cumulative volume of 114,916 cubic metres (24% approved dredge volume). Data is taken from pre-dredge and post-dredge (below-above net figure) – sighted for 2022, 2023, 2024 dredge campaigns.	Bathymetric Reports Dredge volume records Pre and post dredge survey data Interview Environment Superintendent	Dredging records	Compliance
3	RTA must only dump within the disposal site.	Long-term Maintenance Dredging Management Plan (LMDMP) Section 9.2 notes that an EMP will be	LMDMP	Review LMDMP	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		developed for each annual dredge campaign. This shall contain spoil placement requirements. Port of Brisbane Dredging Environmental Management Plan Amrun section 4 specifies that all dredged material will be deposited at the Amrun DPMA. EMPs reviewed May 2022, May 2023, May 2024. Dredge track records included in the final bathymetric surveys reported in the bathymetric reports (2022, 2023, 2024) showed disposal of material was well within the required site. Daily track plots are generated e.g. 23/5/22, 9/5/23, 13/5/24, 14/5/24. TSHD "Brisbane" daily records sighted include hours of operation, location and volume estimates e.g. 23/5/22, 11/5/23, 14/5/24.	Interview Environment Superintendent Dredge EMPs Daily dredge records Bathymetric surveys	Dredging records	
4	RTA must ensure that each load of dredge material is dumped so that the dumped material is distributed evenly over the whole disposal site.	Long-term Maintenance Dredging Management Plan (LMDMP) Section 9.2 notes that an EMP will be developed for each annual dredge campaign. This shall contain spoil placement requirements. Port of Brisbane Dredging Environmental Management Plan Amrun May (2022, 2023, 2024) section 4 specifies that all dredged material will be deposited at the Amrun DPMA and spread evenly.	LMDMP Bathymetric survey reports Daily dredge reports Daily track plots	Review LMDMP Review Dredge EMP Review post dredge survey maps	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Daily reports are generated that specify the activities for the day. Daily track plots are generated e.g. 23/5/22, 9/5/23, 13/5/24, 14/5/24. No concerns related to distribution of dumped material.	Interview Environment Superintendent		
5	RTA must establish by GPS that, prior to dumping, the vessel is within the disposal site.	Long-term Maintenance Dredging Management Plan (LMDMP) Section 9.2 notes that an EMP will be developed for each annual dredge campaign. This shall contain spoil placement requirements. Port of Brisbane Dredging Environmental Management Plan Amrun May (2022, 2023, 2024) section 9.2 specifies that records must include GPS track for each material placement run and GPS track for each dredge run. LMDMP Section 2.6 requires that prior to dumping, the vessel must establish by GPS that it is inside the disposal site before commencing dumping. Records showed disposal of material was well within the required site.	LMDMP Daily dredge records Interview Environment Superintendent	Review daily dredge records to ensure vessel in the appropriate location – all trips	Compliance
6	RTA must implement the approved Monitoring and Management Plan.	SD2020/3999 defines the Monitoring and Management Plan as the Amrun Port and River Facilities Long-term Maintenance Dredge	LMDMP	Review LMDMP Review Dredge Records	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Management Plan 2021 – 2031 dated January 2021 (LMDMP). Implementation of this LMDMP is reported in this checklist.			
7	RTA may submit the Minister's approval a revised version of the Monitoring and Management Plan specified under Condition 6. If the Minister approves such a revised Monitoring and Management Plan, the revised Monitoring and Management Plan must be implemented in place of the original Monitoring and Management Plan specified in Condition 6.	The LMDMP has not been revised since the initial approval.	Interview Superintendent Environment	Interview	Not applicable
8	If the Minister believes that it is necessary or desirable for the better protection of the environment to do so, the Minister may request RTA to make specified revisions to the Monitoring and Management Plan approved under Condition 6 and submit the revised	Advised that the Minister has not requested a revision to the Monitoring and Management Plan (LMDMP).	Interview Superintendent Environment	Interview	Not applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	Monitoring and Management Plan for the Minister's approval. If the Minister approves a revised Monitoring and Management Plan pursuant to this condition, RTA must implement that Monitoring and Management Plan instead of the original Monitoring and Management Plan.				
9	The Monitoring and Management Plan must be available for the life of the permit (electronically) on the RTA website within 30 days of the Monitoring and Management Plan being approved by the Minister.	SD2020/3999 defines the Monitoring and Management Plan as the Amrun Port and River Facilities Long-term Maintenance Dredge Management Plan 2021 – 2031 (LMDMP). This is available on the RTA website. Approved 3/2/21. Note that the 2023 Annual Compliance Report incorrectly reported a non-compliance due to a misunderstanding that the Monitoring and Management Plan referred to in Condition 9 of the SD permit is the LMDMP, which was available on the Project website at the time. EPBC 2022 audit report notes that the LMDMP was available of the Project website.	EPBC 2022 audit RTA website	EPBC 2022 audit Review RTA website	Compliance
10	RTA may revise the Monitoring and Management	No revision of the LMDMP has occurred.	N/A	N/A	Not applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	Plan specified under Condition 6 without submitting for re-approval, if the taking of the action in accordance with the revised Monitoring and Management Plan would not be likely to have a new or increased impact, or reduce the public access.				
11	Prior to the commencement of the dumping activities, RTA must ensure that a check is undertaken, using binoculars from a high observation platform, for marine species within the monitoring zone.	LMDMP requires a check to be undertaken prior to commencement of dumping activities. This requirement is included in the Dredge EMP's. Daily dredge records showed marine observer in place. Name is recorded. E.g. 13-14/5/24. Amrun Environmental Audit Checklist TSHD Brisbane confirms binoculars on board for use .	LMDMP Dredge EMP Daily dredge records Interview Environment Superintendent	Review LMDMP Review dredge records Interview	Compliance
12	If any marine species are sighted in the monitoring zone, RTA must not commence dumping activities until either 20 minutes after the last marine species is observed in the monitoring zone, or the vessel has moved to another area of the disposal site where it can	Dredging marine fauna reporting database shows no sightings of marine species in monitoring zone during maintenance dredging (23,24,25 May 2022; 9,10 May 2023; 13,14 May 2024) – noted as Nil.	Amrun Dredging marine fauna reporting database Interview Environment Superintendent	Review dredging records to evaluate actions on sighting marine mammals and turtles – reviewed all	Not Applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	maintain a minimum distance of 300 metres between the vessel and any marine species.			records for the dredging period	
13	If at any time during the course of the dumping activities, an environmental incident occurs or an environmental risk is identified, all reasonable measures must be taken immediately by RTA to minimise or mitigate the risk or the impact. RTA must provide a report on the environmental incident or environmental risk to the Department within 72 hours, with details of the incident or risk, the measures taken, the success of those measures in addressing the incident or risk and any additional measures proposed to be taken.	No environmental incidents have occurred. Dredging marine fauna reporting database indicates no incidents have occurred. 2022, 2023, 2024.	Dredging marine fauna reporting database Interview Environment Superintendent	Review records to evaluate reporting of incidents	Not Applicable
14	RTA must document any incidents involving the dumping activities that result in injury or death to any	No environmental incidents have occurred in the course of dumping activities that resulted in injury or death to any marine mammals, marine turtles or EPBC Act listed species.	Dredging marine fauna reporting database	Review Dredging marine fauna	Not Applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	marine species. The date, time and nature of each incident and the species involved, if known, must be recorded, and the incident is to be reported to the Department within 72 hours.	Dredging Marine Fauna Database includes a tab for Fauna Observations. Any incidents are to be recorded on this spreadsheet. This includes the requirement to record vessel location and details, observer, sighting details, species, and number of animals in the group, animal behaviour, animal injured (Y/N), distance from dredging, within exclusion zone (Y/N), dredging ceased (Y/N), time details and relevant comments.		reporting database	
15	RTA must ensure that all persons engaged in the dumping activities under this permit, including the owner(s) and person(s) in charge of the vessel, comply with this permit and the requirements of the Act. The fulfilment of these conditions remains the responsibility of RTA.	Advised Port of Brisbane conducts annual training for crew TSHD Brisbane. EMP sign on for all crew – e.g. Amrun May 2024 EMP crew sign on sheet.	Training Records	Review records required by the SD permit	Compliance
16	If requested by the Department, RTA must provide access for at least two nominees of the Department to witness, inspect, examine and/or audit any part of the operations, including any dumping activities or monitoring activities, the vessel or any	Advised that no request from the Department has been made.	Interview Environment Superintendent	Determine if request by Department has been made	Not Applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	other equipment, or any documented records. RTA must provide all reasonable assistance to the nominees of the Department for carrying out their duties.				
17	RTA must make and retain records comprising either weekly plotting sheets or a certified extract of the ship's log which detail: a) the dates and times of when each dumping run commenced and finished; b) the position (as determined by GPS) of the dumping vessel at the beginning and end of each dumping run, including the path of each dumping run; c) the volume of dredge material (in-situ cubic metres) dumped and quantity in dry tonnes for the specified operational period, and compared to the total amount permitted under the permit; d) the person(s) undertaking the marine species observation required in	Daily logs show load number, operation (steam/dredge/discharge), start and finish times, GPS position, load in cubic metres and quantity in dry tonnes, marine species observer name, detail of marine species sighted (nil), vessel master. No actions were required to be taken to address condition 12 as no marine species were sighted. e.g. Logs of Dredge "Brisbane" at Amrun for 23/5/22, 9/5/23, 11/5/23, 14/5/24.	Log of daily discharge records	Review records that show the details of each dumping run	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	Condition 11 and any marine species observed within the monitoring zone for each run, including the date, time and approximate distance from the vessel and any action taken to comply with Condition 12. e) the person(s) responsible for the operation of the vessel at any time during dumping activities.				
18	RTA must retain the records required by Conditions 13, 14 and 17 for verification and audit purposes.	Records relevant to Conditions 13, 14 and 17 were available for the audit.	See Conditions 13,14,17	See Conditions 13,14,17	Compliance
19	RTA must ensure that a bathymetric survey of the disposal site is undertaken by a suitably qualified person. a) prior to the commencement of dumping activities under this permit; and b) within one month of the completion of all dumping activities authorised under this permit.	Surveys prepared by NAMASYS on behalf of North Queensland Bulk Ports Corporation. Spoil ground surveys. Information contained within the Bathymetric Reports. 2022 – 29,000m³ Pre-dredge disposal bathymetry survey completed on 30/4/22 Dredging occurred between 23-25/5/2022 Post-dredge disposal bathymetry survey completed 27/5/22 2023 – 34,600m³ Pre-dredge disposal bathymetry survey completed on 5/5/23	Dredging – pre-survey dredge area and spoil ground Dredging – post-survey dredge area and spoil ground	Records of bathymetric surveys pre and post dredging across all dredging activities conducted	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Dredging occurred between 9-11/5/23 Post-dredge disposal bathymetry survey completed 12/5/23 2024 – 51,316m³ Pre-dredge disposal bathymetry survey completed on 10/5/24 Dredging occurred between 12-14/5/23 Post-dredge disposal bathymetry survey completed 25/5/24 Records confirm bathymetric surveys occurred prior to commencement of dumping and within one month of the completion of all dumping activities authorised under the permit.			
20	Within two months of the final bathymetric survey being undertaken, RTA must provide a digital copy of the bathymetric surveys to the Australian Hydrographic Office.	NAMASYS sends an email to the AHO with links to the bathymetric survey data. Post-dredge 2022 Bathymetric survey conducted 27/5/22. Email to Australian Hydrographic Surveys (AHS) with links to digital copy of bathymetric surveys sent 19/7/22. Within 2 months, as specified. Post-dredge 2023 Bathymetric survey conducted 12/5/23. Email to Australian Hydrographic Surveys (AHS) with links to digital copy of bathymetric surveys sent 13/6/23. Within 2 months, as specified. Post-dredge 2024 Bathymetric survey conducted 25/5/24. Email to Australian Hydrographic Surveys (AHS) with links to digital copy of bathymetric surveys	Email to AHO 4/9/24 Email to AHO 13/6/23 Email to AHO 4/9/24 Interview Environment Superintendent	Evidence of reporting to the Department within two months Interview	(Minor administrative) Non-Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		sent 4/9/24. Over 2 months – minor administrative non-compliance. It should be noted that North Queensland Bulk Ports Corporation (NQBPC) conducted the maintenance dredging for Weipa and Amrun within the same dredge campaign. In 2024 the Weipa dredge campaign was split, substantially extending the completion date of the Weipa component to 18/7/24. The final bathymetry survey for Weipa was completed 27/7/24. It appears as though NAMASYS processed the Amrun and Weipa submissions together. 2/3 of the bathymetric surveys were provided to the AHO within the specified 2 month timeframe. It should be noted that the 2 month deadline is an arbitrary timeframe as it appears as though AHO do not rapidly process the data. Given that processing the data into the required format is a significant administrative burden, and the dredging campaign at Amrun is not operationally a separate campaign to that of Weipa, consideration could be made to amending the SD#20 condition to submit data to the AHO when requested.			
21	RTA must provide a report on the bathymetry to the Department within two	2022 Bathymetric report – SD2020-3999 submitted via email 25/7/22	Email correspondence confirming	Evidence of reporting to the Department	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	months of the final bathymetric survey being undertaken. The report must include a chart showing the change in sea floor bathymetry as a result of dumping activities and include written commentary on the volumes of dumped material that appear to have been retained within the disposal site.	2023 Bathymetric report – SD2020-3999 submitted via email 11/7/23 2024 Bathymetric report – SD2020-3999 – submitted via email 24/7/24 Bathymetric reports include a Difference Plot (May 2022, May 2023, May 2024) a chart showing the change in sea floor bathymetry resulting from the dumping activities. Commentary is provide relating to the material placement area, noting sediment movement is naturally occurring.	report has been uploaded to AHS website Bathymetric reports 2022, 2023, 2024 Interview Environment Superintendent	within two months Interview	
22	To facilitate annual reporting to the International Maritime Organization, RTA must report to the Department by 31 January each year, including on the day of the expiry of the permit or completion of all dumping activities under this permit, information at Appendix 2 to this permit, or in a format as approved by the Department from time to time.	Report provided to the IMO for 2022 submitted via email 30/1/2023 Report provided to the IMO for 2023 submitted via email 29/1/24 Report provided to the IMO for 2024 submitted via email 12/12/24. All reports to the International Maritime Organisation were lodged by the due date.	Sea Dumping Permit International Reporting Requirements	Evidence of annual reporting to IMO	Compliance
Appendix 2	Completion of reporting requirements – due 31 January each year.	See above			

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
CLEARING – TERRESTRIAL MANAGEMENT PLAN					
Condition 20 EPBC 2010/5642 <i>The approval holder must not clear vegetation or remove more than 29,658 hectares of vegetation over the life of the project. The maximum clearing of vegetation for mining areas and infrastructure that can occur in any 12 month period is 4,000 hectares.</i>					
20.1	Total clearing of vegetation to date must be less than 29,658 hectares.	Progressive annual totals reported in EPBC compliance report 2022 - 5,385Ha , 2023 – 5,959Ha , 2024 - 7,440Ha. Annual reporting year May – April. The mine planning end of month report (EOM) data is tallied to calculate annual figures. The source of the EOM comes from survey shape files – extracted from the ArcGIS pro equipment within the machinery. Long term mine management planning team prepare the annual plan, which is reviewed by environmental personnel before approval. ArcGIS online – clearing tracker – sighted red polygons which is the proposed clearing. May-December 2024, taken from monthly shapefile data clearing 565Ha Cumulative total to the end of December 2024 is 8,005Ha.	Amrun clearing inventory spreadsheet End of Month clearing memos e.g. 30/6/22, 30/9/23, 29/8/24 Monthly clearing shapefile data EPBC Annual Compliance Report 2022 EPBC Annual Compliance Report 2023 EPBC Annual Compliance Report 2024	Review system for management of clearing Review clearing records Interview	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
			Interview Superintendent Land & Rehab Interview Land Management Advisor		
20.2	The maximum clearing of vegetation for mining areas and infrastructure in any 12 month period must be 4,000 hectares.	The annual clearing plan is reviewed to ensure that it is well below the annual limit. Amrun clearing inventory is progressively updated, with monthly totals recorded. End of month clearing reports are generated. For example, 30/6/22 185.0Ha cleared. 30/9/23 119.57Ha cleared. 29/8/24 159.78Ha cleared. Annual reporting year May – April reports cumulative total. 2022 - 5,385Ha , 2023 – 5,959Ha , 2024 - 7,440Ha. Note: EPBC 2022 audit report notes previous cumulative total as 1546.2Ha. Records show less than 4,000 hectares is cleared in any 12 month period.	End of Month clearing memos e.g. 30/6/22, 30/9/23, 29/8/24 EPBC Annual Compliance Reports 2022, 2023, 2024 EPBC 2022 audit report Interview Superintendent Land & Rehab Interview Land Management Advisor	Review clearing records Interviews	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding																
Condition 21 EPBC 2010/5642 <i>To mitigate impacts on Red Goshawk (Erythrotriorchis radiates) and Masked Owl (Tyto novaehollandiae kimberli), Listed flora species and Listed migratory species the approval holder must provide vegetation buffer zones from mining area/s (in addition, to buffer zones required under state regulations) for the Environmental Features (as defined in the Queensland Department of Natural Resources and Mines Regional Vegetation Management Code for Western Bioregions (version 2.1, 30 November 2012)) described in following table. The vegetation buffer zones exclude areas of infrastructure.</i>																					
<table><tr><th>Environmental feature</th><th>Vegetation buffer zones</th></tr><tr><td>Stream order one or two</td><td>100m to 200m** from edge of riparian</td></tr><tr><td>Stream order three or four</td><td>100m to 200m** from edge of riparian vegetation</td></tr><tr><td>Stream order five and above</td><td>200m from edge of riparian vegetation</td></tr><tr><td>Natural wetland</td><td>200m from edge of wetland vegetation</td></tr><tr><td>Natural significant wetland</td><td>200m from edge of wetland vegetation</td></tr><tr><td>Tidal areas and marine plants***</td><td>200m from boundary of feature</td></tr><tr><td>Vine forest, coastal vegetation on sand, estuaries</td><td>200m from edge of relevant vegetation type</td></tr></table>						Environmental feature	Vegetation buffer zones	Stream order one or two	100m to 200m** from edge of riparian	Stream order three or four	100m to 200m** from edge of riparian vegetation	Stream order five and above	200m from edge of riparian vegetation	Natural wetland	200m from edge of wetland vegetation	Natural significant wetland	200m from edge of wetland vegetation	Tidal areas and marine plants***	200m from boundary of feature	Vine forest, coastal vegetation on sand, estuaries	200m from edge of relevant vegetation type
Environmental feature	Vegetation buffer zones																				
Stream order one or two	100m to 200m** from edge of riparian																				
Stream order three or four	100m to 200m** from edge of riparian vegetation																				
Stream order five and above	200m from edge of riparian vegetation																				
Natural wetland	200m from edge of wetland vegetation																				
Natural significant wetland	200m from edge of wetland vegetation																				
Tidal areas and marine plants***	200m from boundary of feature																				
Vine forest, coastal vegetation on sand, estuaries	200m from edge of relevant vegetation type																				
• • Set based on site specific factors following field survey. * * * Category B Environmentally Sensitive area as defined by the Environmental Protection Regulation 2008 (Qld).																					
21.1	Vegetation buffer zones as identified must be provided from mining area/s	Terrestrial Management Plan – South of Embley Project – Amrun 28 May 2020 Section 4 details specifications for Environmental Buffer Systems for the listed relevant species. Section 6 describes the implementation of vegetation buffer zones. These	Terrestrial MP Environment Pre-Clearing (pre-disturbance)	Review records to show buffer is being complied with	Compliance																

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		buffers were sighted on Arc GIS Pro – green = vegetation buffers, Pink = wildlife buffers. Environment Pre-Clearing (pre-disturbance) procedure (24/2/2023) specifies detailed requirements. Pre-disturbance surveys are conducted prior to all clearing. All clearing boundaries are recorded on ARC GIS Pro (sighted files). Buffer zones are included in ARC GIS using the Queensland RE layer and additional more detailed sensitive vegetation data. Ground truthing occurs as part of the approval process. An approved permit is required before any clearing activities commence. This includes the requirement for a heritage and environmental approval. This approval lasts for two weeks. If clearing has not been conducted within this timeframe, then another pre-clearing survey must be conducted. Evidence of this was sighted via the Mine Preclear Survey Tracker spreadsheet. Weekly reports are generated by an ecologist to manage clearing approval, with an annual survey report prepared. For example, Amrun Mine Clear Survey Report 2023. Maps attached with details of nest/hollow, bird recording site	procedure (24/2/2023) Cleared survey file – ARC GIS Pro Mine Clear survey tracker spreadsheet Amrun Mine Clear Survey Report 2023 Ecological memo 26/7/22 Pre-clear survey tracker 13/11/24 Interview Land Management Advisor	Evidence of compliance with pre-clearing procedures	

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Weekly pre-clear survey tracker 13/11/24 shows a spreadsheet of areas that can be cleared green, yellow highlight is of concern e.g nest that might require buffer. Includes survey dates. Ecological Memo 26/7/22 Norman Creek Haul Road Ecological Assessment shows planned mine clearing with wildlife protection buffers and revised environmental buffers and vegetation type boundaries. The shapefile generated in ARC GIS PRO specifying the buffer zones and permitted clearing zones are transferred to the GPS system showing clearing zone and buffers in the dozer equipment. No-go zones are programmed to avoid specified areas. This system continues to be well implemented with all processes in relation to establishment and adherence to buffer zones were demonstrated.			
Condition 22 EPBC 2010/5642 <i>Prior to any clearing of vegetation (including for Preliminary Works), surveying must be undertaken to ascertain whether active, or potentially active, nests for the Red Goshawk (Erythrotriorchis radiates) and/or Masked Owl (Tyto novaehollandiae kimberli) are present in the area to be cleared. Surveying must be undertaken for the:</i> <i>a. Red Goshawk – in areas located within one (1) kilometre of permanent water supporting riparian gallery forest or Paperback wetland; seasonally inundated coastal wetlands and seasonal water courses supporting riparian gallery forest, or an estuary; and,</i> <i>b. Masked Owl - in areas within 200 metres of permanent water supporting riparian gallery forest of paperbark wetland, seasonally inundated Paperbark wetlands, seasonal watercourses supporting riparian gallery forest or an estuary.</i>					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
22.1	Prior to any clearing, surveys for Red Goshawk and Masked Owl must be undertaken during nesting and fledging seasons to ascertain whether active, or potentially active, nests for the Red Goshawk and Masked Owl are present.	Terrestrial Management Plan Section 6 requires a Pre-Disturbance Program to be implemented prior to clearing of any vegetation. This consists of pre-disturbance surveys, implementing a range of buffer distances as specified in this EPBC approval, ground truthing buffer requirements based on the findings of surveys, establishing conditions for clearing as required, recording all results and assessments in GIS, issuing ground disturbance permits and implementation of the ground disturbance approval procedure. The Terrestrial Management Plan section 6.1.2 details the survey requirements for the Red Goshawk and the Masked Owl. This includes: determining presence of Red Goshawk (within 1 km of specified locations) and Masked Owls (within 200m of specified locations). Surveys involve walk through. Observations of nest are required to be recorded and assessed. Amrun Project (EPBC 2010/5642) – Annual Environmental Monitoring Reports outlines the method of the pre-disturbance program that is conducted prior to clearing of any vegetation in relation to the Red Goshawk and the Masked Owl, confirming that pre-clear surveys are conducted during nesting and fledgling seasons. Results are reported.	Terrestrial MP Interview Land Management Advisor Amrun Project (EPBC 2010/5642) – Annual Environmental Monitoring Report 2022 Amrun Project (EPBC 2010/5642) – Annual Environmental Monitoring Report 2023 Amrun Project (EPBC 2010/5642) – Annual Environmental Monitoring Report 2024	Review TMP relating to the process for clearing to evaluate requirement for survey and review records showing this occurs Interviews	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		2022 Report dated 12 August 2022 section 3 – reported 2 Red Goshawk pairs, confirmed active nest; 5 confirmed Osprey sightings/ nest activity; 2 suspected osprey due to nest characteristics. Noted that buffer was established. 2023 Report dated 12 August 2023 section 2 – reported 1 Red Goshawk, 3 confirmed active nests (2 recorded from previous survey); 1 incidental Osprey sightings. Noted that buffer was established for the Red Goshawks. 2024 Report dated 9 August 2024 section 2 – reported 2 Red Goshawk confirmed active nest from previous survey; 1 incidental sighting; 2 confirmed Osprey nests; 3 individual Osprey sightings and 1 White-bellied Sea-eagle nest. Noted that buffer was established.	Interview Superintendent Land & Rehab Interview Land Management Advisor		
Condition 23 EPBC 2010/5642 <i>The Pre-disturbance Program must include avoidance, mitigation or management measures (and may include measures in the Final Environmental Impact Statement) if active, or potentially active, nests for the Red Goshawk or Masked Owl are found during surveying, including a 200 metre buffer zone around nest trees. The nest tree and buffer zone cannot be cleared or disturbed until the end of the breeding season (being until fledglings no longer use the nest for habitat).</i>					
23.1	Pre-disturbance Program must include avoidance, mitigation or management measures if active, or potentially active, nests for the Red Goshawk or Masked Owl are found during surveying including a 200	Terrestrial Management Plan Section 6.1.2 specifies requirements for environmental buffers. There is a requirement that specifies that if an active nest is identified, measures will be implemented and a 200m buffer established around nest trees. Clearing of trees with active nests and the buffer zone will not	Reviewed TMP Interview Superintendent Land & Rehab	Review TMP relating to the pre-disturbance program for listed species Interviews	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	metre buffer and avoidance of clearing or disturbing a nest tree and buffer zone until fledglings no longer use the nest for habitat.	occur until the end of the breeding season. Breeding seasons are noted in the Terrestrial MP. Amrun Project (EPBC 2010/5642) – Annual Environmental Monitoring Reports 2022, 2023, 2024 confirm required buffers are established where required, as detailed above in Condition 22.	Interview Land Management Advisor		
Condition 24 EPBC 2010/5642 <i>Information obtained during the Pre-disturbance Program must be used to inform the Terrestrial Management Plan at condition 25.</i>					
24.1	Information obtained during the Pre-disturbance Program must be used to inform the Terrestrial Management Plan at condition 25.	Terrestrial Management Plan V2.1 dated 28 May 2020 includes information from the pre-disturbance program. These included: red goshawk (section 4.1) and the masked owl (section 4.2). It was noted in section 4.3 that bat surveys conducted did not detect Bare-rumped sheath-tail bats however noted that if there were identified in the project area then adaptive measures to avoid and mitigate impacts would be implemented. No specific measures are warranted to mitigate any impacts to listed migratory birds as negligible impacts are expected (section 4.5). Section 4.4 addresses protected flora, utilising survey results. Section 6.1.2 details the pre-disturbance program. This addresses the requirements specified in Condition 25.	Reviewed TMP	Review TMP	Compliance
TERRESTRIAL MANAGEMENT PLAN Condition 25 EPBC 2010/5642 <i>The approval holder must submit a Terrestrial Management Plan covering all of the land based activities associated with the construction and operation of the project for the Minister's approval to effectively define, avoid, adaptively manage and mitigate negative impacts to the following matters of national environmental significance:</i>					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
i. Red Goshawk (<i>Erythrorhynchus radiatus</i>); Masked Owl (<i>Tyto novaehollandiae kimberli</i>); and Bare-rumped Shearwater (<i>Saccolaimus saccolaimus nudiclunatus</i>) ii. Listed migratory bird species; and, iii. Listed flora species.					
25.1	Terrestrial Management Plan must be submitted for Minister's approval.	The EPBC 2016 audit report noted that the RTA Weipa Terrestrial Management Plan – South of Embley Project 14 October 2015 was submitted and approved. The EPBC 2022 audit report reported that in accordance with the requirements of Condition 30, a revised Terrestrial MP was submitted for Approval 3 February 2020 via email to DoEE 30 January 2020, with confirmation receipt received 30 January 2020 from DoEE. Letter dated 12 June 2020 from DAWE approving Terrestrial Management Plan dated 28 May 2020 approving revised Terrestrial MP. An updated version of the TMP was submitted 3/2/2025 to address the requirements of condition 30.2. Acknowledgement email following initial assessment from DCCEEW 24/2/2025. Minister approval of the revised TMP, required under condition 30.2, has not yet occurred.	Reviewed EPBC 2016 audit report Reviewed EPBC 2022 audit report Interview Land Management Adviser Email to DCCEEW 3/2/2025 Email from DCCEEW 24/2/2025	EPBC 2016 Audit Report EPBC 2022 Audit Report Terrestrial MP Confirm no change to Terrestrial MP since 2022 audit	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
25.2	Terrestrial Management Plan must address impacts to the following matters of national environmental significance: i. Red Goshawk (<i>Erythrotriorchis radiates</i>); - Masked Owl (<i>Tyto novaehollandiae kimberli</i>); and - Bare-rumped Sheath-tail Bat (<i>Saccolaimus saccolaimus nudiclunatus</i>) ii. Listed migratory bird species; and, iii. Listed flora species.	Terrestrial Management Plan dated 28 May 2020. Terrestrial MP Section 1 states purpose as documenting principles and practices associated with all land based activities associated with construction and operation to manage, avoid and mitigate potential negative impacts on Matters of National Environmental Significance (as listed i,ii,iii). Reference is made to Conditions EPBC 2010/5642 Conditions 25 to 30. Potential impacts and management measures are summarised: Red Goshawk – section 4.1 Masked Owl – section 4.2. Bare-rumped Sheath-tail Bat section 4.3. Migratory birds – as referred to in Annexure 1 of EPBC 2010/5642 including International Migratory Shorebirds, Waterbirds, Seabirds, Raptors, Woodland Birds, Barn Swallow and Aerial Species. Details of these species are included in Annex B of the Terrestrial MP. Listed flora species (4.4.1 Cooktown Orchid, 4.4.2 Chocolate Tea Tree Orchid, 4.4.3 Beach Nightshade) Section 5 outlines the potential impacts and risks. Section 6 details the avoidance, mitigation and management measures.	Reviewed TMP	Evaluation of TMP relating to addressing impacts to MNES	Compliance
Condition 26 EPBC 2010/5642 <i>The Terrestrial Management Plan must incorporate avoidance and mitigation measures for each impact associated with the project including, but not limited to:</i>					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		<i>a. measures for water related impacts including, but not limited to, erosion, construction and operation of the dam; stormwater runoff, flood events, hydrocarbon spills, sewage, crude or process water, runoff from ore stockpiles, and downstream impacts on watercourses, streams and marine environment (including estuaries);</i> <i>b. measures for pests and weed management, dust management, and fire management:</i> <i>c. implementing the vegetation buffers zones at condition 21; and,</i> <i>d. measures identified in the Environmental Management Plan Outlines at Appendix 5-A (Threatened Flora Species); Appendix 6-C (Threatened fauna species); Appendix 8-A (Avian Migratory Species); and, Appendix 16-B (Water Monitoring and Management Conditions) in the Final Environment Impact Statement.</i>			
26.1	Terrestrial Management Plan must incorporate avoidance and mitigation measures addressing a. through d.	Terrestrial Management Plan dated 28 May 2020. Section 5 outlines the potential impacts and risks. Section 6 details the avoidance, mitigation and management measures.	Reviewed TMP	Evaluation of TMP relating to addressing impacts to items a-d	Compliance See below
26.1a	Water related impacts	Terrestrial MP Section 6.5 Water Management Measures specifies measures to be implemented to minimise impacts on the species covered in the plan related to erosion, dam operation, stormwater runoff, flood events, hydrocarbon spills, sewage, crude or process water, runoff from ore stockpiles, downstream impacts on watercourses, wetlands and marine environment. Measures include: constructing and maintaining appropriate structures, Erosion and Sediment Control Plan, Water Management Plan, surface water monitoring program, controls relating to recycling water and treating effluent, rehabilitation requirements, discharge specifications, dam design specifications for flood mitigation, limiting storage and management of hydrocarbons.	Reviewed TMP	Evaluation of TMP relating to management of water related impacts	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
26.1b	Pests and Weeds, dust and fire	Terrestrial Management Plan section 6.2 Fire. A Fire Management Program was developed with Traditional Owners and the WCCCC including aerial and ground based burning techniques implemented by the Land and Sea Management Programme. This includes annual fire planning and workshops, pre-fire season inspections, fuel reduction burning, monitoring and post-fire season inspections and monitoring. Terrestrial Management Plan Section 6.3 Weed Management Program. Program notes main focus will be early detection and early control of invasive weeds. Priority weed species are listed. Washdown facilities and management of these, weed surveys, mapping including GIS database, training, protocols and access control form the basis of the Weed MP. Terrestrial Management Plan Section 6.4 covers the Feral Pig Control Program, referencing the Feral Pig Management Offset Strategy; as well as Feral Cats and Dogs outlining requirements relating to monitoring, trapping and record keeping. Terrestrial MP Section 6.6 Dust. Measures lists dust abatement measures including: implementation of environmental buffers; restricting the area of disturbance; restricting speed and haul road watering.	Reviewed TMP	Evaluation of TMP relating to management of pests, weeds, dust and fire	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
26.1c	Vegetation buffer zones	Terrestrial Management Plan Section 6.1.1 requires the implementation of the Environmental Buffer System and refers to the set back distances from sensitive vegetation types.	Reviewed TMP	Evaluation of TMP relating to management of vegetation buffer zones	Compliance
26.1d	Measures in the EMP from the EIS	Terrestrial MP Table 9 details the action plans for each species.	Reviewed TMP	Evaluation of TMP relating to management of actions listed in the EIS	Compliance
Condition 27 EPBC 2010/5642 <i>The Terrestrial Management Plan must also include adaptive management strategies to benefit the species listed at condition 25. The Terrestrial Management Plan must include and address effective management strategies to mitigate each potential impact, desired outcomes, benchmarks, readily measureable performance indicators and goals, timeframes for reporting and implementation, corrective actions and contingency measures, and, specify the person/s roles with responsibility for implementing actions. The Terrestrial Management Plan must provide information detailing Traditional Owner employment opportunities, and mechanisms for reporting the number of local indigenous person/s actually employed in the implementation of this Plan (consistent with condition 42).</i>					
27.1	Terrestrial Management Plan must include adaptive management strategies to benefit the species listed at condition 25.	Terrestrial MP Section 5 and section 6. These strategies are summarised in Table 9. Section 4.3 notes that should the Bare-rumped Sheathtail Bat be identified in the Project area, adaptive management measures to avoid and mitigate impacts will be incorporated into the management plan within 6 months of identification of the species.	Reviewed TMP	Evaluation of TMP relating to inclusion of adaptive management strategies	Compliance
27.2	Terrestrial Management Plan must include and address effective management	Terrestrial MP Table 9 details potential impact, species potentially impacted, avoidance mitigation and management measures, desired outcomes and	Reviewed TMP	Evaluation of TMP relating to the inclusion of	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	strategies to mitigate each potential impact, desired outcomes, benchmarks, readily measurable performance indicators and goals, timeframes for reporting and implementation, corrective actions and contingency measures, and specify the persons/ roles with responsibility for implementing actions.	benchmarks and performance indicators; as well as timeframes, corrective actions and contingency measures. Responsibility is listed.		management strategies to mitigate impacts, as listed	
27.3	Terrestrial Management Plan must provide information detailing Traditional Owner opportunities for employment, and mechanisms for reporting the number of local indigenous person/s actually employed in the implementation of this Plan (consistent with condition 42).	MP Section 8 Traditional Owner Employment Opportunities notes Traditional Owner employment opportunities will be available via: Feral Pig Control Program; Feral cat and dog control Program; Weed Management Program; Rehabilitation Program, Water Management Program; Fire Management Program; and Seed collection associated with rehabilitation. Terrestrial MP notes as part of the reporting obligations under the Indigenous Land Use Agreement, quarterly review reports are provided to the WCCCA on RTAW's Indigenous employment and training obligations. This report shall include the number of Indigenous employment opportunities taken up under the Land and Sea Management Programs.	Reviewed TMP	Evaluation of TMP relating to Traditional Owner opportunities and employment	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
Condition 28 EPBC 2010/5642 <i>The Terrestrial Management Plan must be informed by the most current information available to avoid, manage or mitigate impact associated with the project (including, but not limited to National Water Quality Management Strategy, Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC 2000) or most current version/s of these guidelines.</i>					
28.1	Terrestrial Management Plan must be informed by the most current information available to avoid, manage or mitigate impact associated with the project.	Terrestrial MP Section 6 refers to currently available information, with reference to survey results undertaken that inform the revised version of the Terrestrial MP.	Reviewed TMP Interview Land & Rehabilitation Superintendent	Evaluate TMP relating to currency of information Interview	Compliance
Condition 29 EPBC 2010/5642 (Variation dated 3 June 2014) <i>The Terrestrial Management Plan must be submitted to the Minister for approval at least 6 months prior to commencement of the action. The commencement of the action must not occur until the Terrestrial Management Plan has been approved by the Minister. The approved Terrestrial Management Plan must be implemented.</i>					
29.1	Terrestrial Management Plan must be submitted to the Minister for approval at least 6 months prior to commencement of the action.	EPBC 2016 audit report noted the Terrestrial Management Plan was submitted to the Minister 2/1/2015, prior to commencement of the action. Commencement of the action was 12/5/2016.	Reviewed EPBC 2016 audit report	EPBC 2016 Audit Report Correspondence confirming submission of TMP	Compliance No further auditing required
29.2	Terrestrial Management Plan must be approved prior to commencement of the action.	EPBC 2016 audit report noted that the DoE had reviewed the Terrestrial Management Plan and found it to meet the requirements of the relevant conditions.	Reviewed EPBC 2016 audit report	EPBC 2016 Audit Report Correspondence confirming approval from DoE	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
29.3	The approved Terrestrial Management Plan must be implemented.	Evidence as listed below confirms implementation of the current Terrestrial Management Plan. Environmental buffer system and pre-disturbance program – see notes Condition 21, 22, 23. Weed management program - 2022 Amrun Periodic (three yearly) Weed Survey Ecological Report (Ecotone, November 2022). Ongoing implementation of weed management procedures. Amrun Project (EPBC 2010/5642) – Annual Environmental Monitoring Report 2022, 2023, 2024 includes reporting of feral animal management, fire management, weed management and implementation of the pre-disturbance program. Feral Animal Control Annual Report 2022 (21/12/22) – three ground control programs and 2 aerial shooting. Feral Animal Control Annual Report 2023 (18/12/23) – three ground control programs and 2 aerial shooting. Feral Animal Control Annual Report 2024 (24/11/24) – three ground control programs and 2 aerial shooting. Fire management includes aerial and ground based burning taking into account environmental and local	Annual Environmental Monitoring reports 2022, 2023, 2024 Feral Animal Control annual reports 2022, 2023, 2024 2022 Amrun periodic (three-yearly) Weed Survey Interview Superintendent Land & Rehab Interview Senior Advisor Biodiversity Interview Rehab Advisor	Records demonstrating implementation of TMP for the current audit period Interviews	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		neighbour considerations. Annual environmental monitoring reports summarise burning campaigns. No items were identified during the site audit that indicated that relevant actions required by the Terrestrial Management Plan had not been undertaken. Land and Sea Management team work across the program, excluding the pre-disturbance program. Compliance with the Feral Pig Offset Strategy is reported in this audit checklist – Condition 43.			
Condition 30 EPBC 2010/5642 <i>Within 60 days of the first anniversary of operations commencing, a revised Terrestrial Management Plan must be submitted to the Minister for approval. The Terrestrial Management Plan must be reviewed, revised and submitted to the Minister for approval every five (5) years (unless otherwise agreed by the Minister in writing) thereafter for the life of the project. The approved Terrestrial Management Plans, as revised, must be implemented.</i>					
30.1	Within 60 days of the first anniversary of operations commencing, the Terrestrial Management Plan must be reviewed, revised and submitted to the Minister for approval.	EPBC 2022 audit report noted: Operations commenced 2 December 2018. First anniversary of operations commencing 2 December 2019. Email dated 30 January 2020 from DoEE states that submission of the Terrestrial Management Plan on 3 February 2020 is fine. This email is in response to a request from RTA Weipa to submit the Terrestrial MP on this date as the 60 day requirement fell on the Sunday.	EPBC audit report 2022	EPBC audit report 2022 Correspondence confirming submission and approval from Minister	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Terrestrial MP submitted for Approval 3 February 2020, within 60 days of the first anniversary of operations commencing. Letter dated 12 June 2020 from DAWE approving revised Terrestrial Management Plan dated 28 May 2020.			
30.2	Every five (5) years thereafter for the life of the project the Terrestrial Management Plan must be reviewed, revised and submitted to the Minister for approval.	Terrestrial Management Plan Section 9 notes that the Terrestrial MP shall be reviewed, revised and submitted to the Minister for approval within 60 days of the first anniversary of commencement of operations and every five years thereafter for the life of the project. EPBC 2022 audit report noted: Operations commenced 2/12/2018 and the first review occurred as reported in Condition 30.1, with the revised Terrestrial Management Plan dated 28 May 2020. Letter dated 12 June 2020 confirming submission of revised Terrestrial MP and approval of the revised Terrestrial MP Current 2025 notes revised Terrestrial Management Plan was submitted for approval 3/2/2025, within the specified five year period. Current audit: Acknowledgement email following initial assessment from DCCEW 24/2/2025.	EPBC audit report 2022 Email to DCCEW 3/2/2025 Email from DCCEW 24/2/2025	EPBC audit report 2022 Correspondence confirming submission and approval from DCCEW	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Minister approval of the revised TMP, has not yet occurred.			
30.3	The revised Terrestrial Management Plans must be implemented in relation to the avoidance and mitigation measures a. to d. from condition 26 and strategies from condition 27.	The revised Terrestrial Management Plan dated 28 May 2020 is implemented. Details specified in conditions 26 and 27. The Revised Terrestrial Management Plan 2025 has not yet been approved by the Minister.	Revised TMP not yet approved	Records confirming implementation of the revised Terrestrial MP	Not applicable
BAT SURVEY					
Condition 31 EPBC 2010/5642 <i>For the Bare-rumped Sheathtail Bat (Saccolaimus saccolaimus nudicluniatu) the approval holder must:</i> <i>a. undertake a targeted Bare-rumped Sheathtail Bat survey in the project area, using broad spectrum acoustic monitoring prior to the commencement of the action. The survey must cover, as a minimum, the area that was subjected to netting as part of the Final Environmental Impact Statement;</i> <i>b. support a research program being conducted by the Australian Bat Society which will aim to improve the quality of the reference call library for microbats of the Cape York region:</i> <i>c. utilise the reference calls acquired by the research program to analyse the targeted survey results for the Bare rumped Sheathtail Bat {at minimum for those reference calls collected as part of the Final Environmental Impact Survey) and further define habitat preferences for the species; and,</i> <i>d. if the Bare-rumped Sheathtail Bat is identified, adaptive management measures to avoid and mitigate impacts from the project must be implemented in the Terrestrial Management Plan at condition 25 within six (6) months of the identification of the species.</i>					
31.1	A targeted Bare-rumped Sheathtail Bat survey must be undertaken in the project area using broad spectrum acoustic monitoring prior to the commencement of the action and covering the area that was subjected to netting as part of	EPBC 2016 audit report noted that a targeted survey for the bare-rumped sheath-tailed bat in the South of Embley Project area was conducted. The report was issued 21 November 2013, prior to the commencement of action (12/5/2016).	Reviewed EPBC 2016 audit report	EPBC 2016 Audit Report Evidence that the survey has been conducted and covers requirements specified.	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	the Final Environmental Impact Statement.				
31.2	Support must be provided for a research program being conducted by the Australian Bat Society which will aim to improve the quality of the reference call library for microbats of the Cape York region.	EPBC Audit Report 2019 Grant Agreement between the Australasian Bat Society, Inc. and RTA Weipa Ltd dated 20/12/2018 to provide support to the ABS Cape York "Bat Blitz". RTA Weipa to provide a one-off lump sum for ABS to conduct a field survey, collect a set of reference echolocation calls, provide a report and produce an echolocation call guide. An invoice for the agreed amount was raised by the ABS 14/1/2019. Remittance advice from RTA Weipa to ABS providing proof of payment for the full amount dated 13/2/2019.	Reviewed EPBC 2016 audit report Reviewed EPBC 2019 audit report	Evidence of support provided to Australian Bat Society. EPBC 2016 audit report EPBC 2019 audit report	Compliance No further auditing required
31.3	Upon collection by the research program, reference calls must be used to analyse the targeted survey results for the Bare rumped Sheathtail Bat collected as part of the Final Environmental Impact Survey and further define habitat preferences for the species.	EPBC Audit Report 2016 and RPBC Audit Report 2019 Bat survey did not identify any Bare Rumped Sheathtail Bats however habitat preference was described for the <i>S. mixtus</i> and <i>S. flaviventris</i> species. A reference call library has been prepared for all bats in the Cape York region. The reference call for the Bare rumped Sheathtail bat was obtained and used to analyse the SoE survey results. There was no indication of presence of the Bare rumped Sheath-tailed Bat from recordings of bat echolocation. The results of the analysis are described in the Terrestrial Management Plan Section 5.11.1.	Reviewed EPBC 2016 audit report Reviewed EPBC 2019 audit report	Evaluate survey report to determine if species identified Evidence of sighting species Reviewed EPBC 2016 audit report	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		DoEE have approved the Terrestrial Management Plan and accepted this analysis.		Reviewed EPBC 2019 audit report	
31.4	If the Bare-rumped Sheathtail Bat is identified, adaptive management measures to avoid and mitigate impacts from the project must be implemented in the Terrestrial Management Plan at condition 25 within six (6) months of the identification of the species.	EPBC Audit Report 2016, EPBC Audit Report 2019 and EPBC Audit Report 2022 Bat survey did not identify any Bare Rumped Sheathtail Bats. Confirmed during 2025 audit that no Bare-rumped Sheathtail bats have been sighted.	Reviewed EPBC 2016 audit report Reviewed EPBC 2019 audit report Reviewed EPBC 2022 audit report Interview Superintendent Land & Rehab	EPBC 2016 Audit Report EPBC 2019 audit report EPBC 2022 audit report Interview	Not applicable
Condition 32 EPBC 2010/5642 <i>The approval holder must notify the department in writing within five (5) business days of any confirmed or suspected observation/s (including for condition 31) in the project area of Bare-rumped Sheathtail Bat.</i>					
32.1	Department must be notified within five (5) business days of any confirmed or suspected observation/s in the project area of Bare-rumped Sheathtail Bat.	No Bare-rumped Sheathtail bats have been sighted.	Interview Superintendent Land & Rehab	Interview	Not applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
REHABILITATION STRATEGY					
Condition 33 EPBC 2010/5642 (Variation dated 9/6/2021) <i>The approval holder must submit an adaptive Rehabilitation Strategy, covering the construction and operation of the project to ensure the rehabilitated areas are functionally equivalent to the pre-disturbance habitat, to enable similar land use to that of the pre-disturbance habitat, by the following matters of national environmental significance:</i> i. Red Goshawk (<i>Erythrotriorchis radiates</i>); ii. Masked Owl (<i>Tyto novaehollandiae kimberli</i>); iii. Barn Swallow (<i>Hirundo rustica</i>); and, iv. if identified as a result of implementing the requirements of condition 31 and condition 32, the Bare-rumped Sheathtail Bat (<i>Saccolaimus saccolaimus nudicluniatatus</i>).					
33.1	Rehabilitation Strategy must be submitted for Minister's approval in accordance with the timeframe in condition 36.	Condition 36 specifies that the Rehabilitation Strategy should be submitted for approval to the Minister by 12/12/2022. The Rehabilitation Strategy was submitted via email to DCCEEW on 12/12/2022 in accordance with the specified timeframe. The Rehabilitation Strategy has not yet been approved.	Email to DCCEEW 12/12/2022	Evidence of submission	Compliance No further auditing required
33.2	Rehabilitation Strategy must be prepared to ensure the rehabilitated areas are functionally equivalent to the pre-disturbance habitat, to enable similar land use to that of the pre-disturbance habitat, by the following matters of national environmental significance: i. Red Goshawk (<i>Erythrotriorchis radiates</i>);	Amrun Rehabilitation Strategy December 2022 was submitted for Minister approval 12/12/2022. This is still a draft document due to a delay in feedback from the Minister. It is noted that the Draft version of the Rehabilitation Strategy includes a commitment to ensure that the rehabilitated areas will be functionally equivalent to the pre-disturbance habitat for the listed species. Letter from DCCEEW 30/8/24 – Review of plan against conditions of the approval and other relevant	Amrun Rehabilitation Strategy December 2022 Letter from DCCEEW 30/8/24 Interview Superintendent Land & Rehab	Rehabilitation Strategy Interviews	Compliance Note: waiting for Minister approval

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	ii. Masked Owl (<i>Tyto novaehollandiae kimberli</i>); iii. Barn Swallow (<i>Hirundo rustica</i>); and, iv. if identified at condition 31 or condition 32, the Bare-rumped Sheathail Bat (<i>Saccolaimus saccolaimus nudiclunatus</i>).	requirements provides feedback that is currently being worked through. Resubmission is planned within the coming months.			
Condition 34 EPBC 2010/5642 <i>The land area to be progressively rehabilitated over the life of the project must be no less than 28,880 hectares. Unless otherwise specified in the approved Rehabilitation Strategy at condition 33, rehabilitation works must commence within two (2) years:</i> <i>i. following mining in the area/s where it has been completed; or,</i> <i>ii. following decommissioning and removal of any infrastructure, in each area where that infrastructure will not be retained at the end of the project.</i>					
34.1	The land area to be progressively rehabilitated over the life of the project must be no less than 28,880 hectares.	End of month land clearing and rehab figures are internally reported e.g. Rehab for Amrun: May 2023 0Ha, February 2024 51.7Ha, January 2024 32.75Ha.	End of month rehab reports Interview Superintendent Land & Rehab	Rehabilitation records Interview	Compliance
34.2	Rehabilitation works must commence within two (2) years of land disturbance categories i. or ii. occurring.	Rehabilitation has occurred where mining in an area has been completed. It was advised that there are no instances where rehabilitation has not occurred where mining was completed over two years ago. Rehabilitation works are not yet required as to date relating to infrastructure (ii) as there are no areas where infrastructure has been decommissioned and removed – not applicable.	Interview Superintendent Land & Rehab Interview Rehab Advisor	Interview s	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
Condition 35 EPBC 2010/5642 <i>The Rehabilitation Strategy must include adaptive management strategies to benefit the species listed at condition 33. The Rehabilitation Strategy must include measures outlined in the Final Environment Impact Statement and address effective management strategies to identify desired outcomes, benchmarks, readily measurable performance indicators and goals, timeframes for reporting and implementation, corrective actions and contingency measures, and, specify the person/s roles with responsibility for implementing actions. The Rehabilitation Strategy must provide information detailing Traditional Owner employment opportunities, and mechanisms for reporting the number of local indigenous person/s actually employed in the implementation of this Strategy, (consistent with condition 42).</i>					
35.1	Rehabilitation Strategy must include adaptive management strategies to benefit the species listed at condition 33.	Condition 36 requires a Rehabilitation Strategy to be submitted by 12/12/2022. This is waiting for Minister approval. The Rehabilitation Strategy includes adaptive management strategies to benefit the listed species.	Draft Rehabilitation Strategy	Review Rehabilitation Strategy	Compliance
35.2	Rehabilitation Strategy must include and address effective management strategies to mitigate each potential impact, desired outcomes, benchmarks, readily measureable performance indicators and goals, timeframes for reporting and implementation, corrective actions and contingency measures, and specify the persons/ roles with responsibility for implementing actions.	Items specified under condition 35.2 are included in the Rehabilitation Strategy, which has not yet been approved. Letter from DCCEEW 30/8/24 – Review of plan against conditions of the approval and other relevant requirements provides feedback that is currently being worked through. Resubmission is planned within the coming months	Draft Rehabilitation Strategy Letter DCCEEW 30/8/24 Interview Superintendent Land & Rehab	Draft Rehabilitation Strategy Interview	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
35.3	Rehabilitation Strategy must provide information detailing Traditional Owner opportunities for employment, and mechanisms for reporting the number of local indigenous person/s actually employed in the implementation of this Plan (consistent with condition 42).	Draft Rehabilitation Strategy includes traditional owner employment opportunities (section 10).	Draft Rehabilitation Strategy	Review Rehabilitation Strategy	Compliance
Condition 36 EPBC 2010/5642 (Variation dated 3 December 2021) <i>The Rehabilitation Strategy must be submitted to the Minister for approval by 12 December 2022, or as otherwise agreed in writing by the Minister. The approved Rehabilitation Strategy must be implemented.</i>					
36.1	Rehabilitation Strategy must be submitted to the Minister for approval by 12 December 2022, or as otherwise agreed by the Minister.	The Rehabilitation Strategy was submitted via email to DCCEEW on 12/12/2022 in accordance with the specified timeframe. The Rehabilitation Strategy has not yet been approved.	Email to DCCEEW 12/12/22	Review correspondence confirming submission	Compliance No further auditing required
36.2	The approved Rehabilitation Strategy must be implemented in relation to the land disturbance categories i. and ii. in condition 34.	The Rehabilitation Strategy submitted by the relevant date has not been approved by the Minister. Therefore Condition 36.2 is not applicable.	N/A	N/A	Not applicable
Condition 37 EPBC 2010/5642 <i>Unless otherwise agreed to by the Minister in writing, every five (5) years from the first anniversary of the approval of the Rehabilitation Strategy at condition 33 a reviewed Rehabilitation Strategy must be submitted to the Minister. The approved Rehabilitation Strategy must be implemented.</i>					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
37.1	Rehabilitation Strategy must be reviewed, revised and submitted to the Minister for approval every five (5) years thereafter for the life of the project.	A Rehabilitation Strategy was submitted on 12/12/2022. This has not yet been approved by the Minister. A revised Rehabilitation Strategy is not yet required – not applicable.	N/A	N/A	Not applicable
37.2	Revised Rehabilitation Strategy must be implemented in relation to the land disturbance categories i. and ii. in condition 34.	A Rehabilitation Strategy was submitted on 12/12/2022. This has not yet been approved by the Minister. A revised Rehabilitation Strategy is not yet required – not applicable.	N/A	N/A	Not applicable
Condition 38 EPBC 2010/5642 <i>If the rehabilitation objectives identified for species identified at condition 33 do not meet any of the success criteria for any of these species as described in the approved Rehabilitation Strategy at condition 33 after 10 years of rehabilitation commencing, or as otherwise agreed in the approved Rehabilitation Strategy, the approval holder must notify the Minister in writing within 20 business days of the area (hectares) over which the rehabilitation objectives and success criteria were not met.</i>					
38.1	If the rehabilitation objectives in Condition 33 do not meet any of the success criteria detailed in the approved Rehabilitation Strategy after 10 years of rehabilitation commencing, or as otherwise agreed in the approved Rehabilitation Strategy, the Minister must be notified in writing within 20 business days of the area (hectares) over	Requirements apply when the success criteria specified in the rehabilitation objectives of the approved Rehabilitation Strategy have not been achieved after 10 years of rehabilitation commencing. The submitted Rehabilitation Strategy has not yet been approved by the Minister. 10 years have not passed since rehabilitation commencement.	N/A	N/A	Not applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	which the rehabilitation objectives and success criteria were not met.				
OFFSET STRATEGY					
Condition 39 EPBC 2010/5642 <i>Within six (6) months of notifying the Minister at Condition 38, the approval holder must submit to the Minister for approval an Offset Strategy outlining the offset to be provided for the matters of national environmental significance identified at condition 33. The related offset must be in accordance with the Environmental Protection and Biodiversity Conservation Act 1999 Environmental Offset Policy (October 2012), or its most current version.</i>					
39.1	Within six (6) months of notifying the Minister at condition 38, an Offset Strategy outlining the offset must be provided to the Minister for approval for the matters of national environmental significance identified at condition 33 submitted.	An Offset Strategy is not required, as no notification to the Minister relating to condition 38 has been made, as Condition 38 is not applicable.	N/A	N/A	Not applicable
39.2	The offset must be in accordance with the Environmental Protection and Biodiversity Conservation Act 1999 Environmental Offset Policy (October 2012), or its most current version.	An Offset Strategy is not required.	N/A	N/A	Not applicable
Condition 40 EPBC 2010/5642 (Variation dated 3 December 2021) <i>The approved Offset Strategy must be implemented.</i>					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
40.1	Following approval, the Offset Strategy must be implemented.	An Offset Strategy is not required.	N/A	N/A	Not applicable
CONSULTATION					
Condition 41 EPBC 2010/5642 <i>The approval holder must consult with Indigenous people in accordance with the process under the Indigenous Land Use Agreement (known as the Western Cape Communities Coexistence Agreement) during preparation of management plans and strategies specified in this approval.</i>					
41.1	Traditional Owners must be consulted through the WCCCA during preparation of Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy.	Review of the EPBC 2016 audit report showed the WCCCA were consulted in the preparation of the following plans: - Temporary Barge Plan - Marine and Shipping Management Plan - Capital Dredging Plan – River - Capital Dredging Plan – Port - Inshore Dolphin Strategy - Terrestrial Management Plan - Feral Pig Offset Strategy Review of the EPBC 2019 Audit Report showed that the Traditional Owners were consulted in the development of the Maintenance Dredge Management Plan. EPBC 2022 audit report: Amrun Project Social Impact Management Plan 2021 Report. It was confirmed that all Plans and Strategies have been lodged with the Western Cape Communities Coexistence Agreement (WCCCA) Coordinating Committee.	Review EPBC 2016 audit report Review EPBC 2019 audit report Review EPBC 2022 audit report Review Draft Rehabilitation Strategy	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report Evaluate each of the listed plans to ensure there is detail relating to Traditional Owner consultation	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Amrun Port and River Facilities Long-Term Maintenance Dredge Management Plan (LMDMP) 2021 – 2031. Meeting minutes 5/8/2020. Current audit: Draft Rehabilitation Strategy (section 9) includes details relating to WCCA consultation and a register of responses from the WCCA.			
EMPLOYMENT OPPORTUNITIES					
Condition 42 EPBC 2010/5642 <i>The approval holder must identify employment opportunities (e.g. under an Indigenous Land and Sea Program or seed collection associated with rehabilitation activities) for Indigenous persons to facilitate the implementation of the conditions specified in this approval.</i>					
42.1	Traditional Owner employment opportunities must be identified within Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy.	EPBC 2016 audit report noted compliance within the following plans: Terrestrial MP; Construction Marine and Shipping Plan; Feral Pig Management Offset Strategy; Temporary Barge Plan; Inshore Dolphin Offset Strategy; Capital Dredge Management Plan – River Facilities; Capital Dredge Management Plan – Port. EPBC 2019 audit report noted compliance with the Maintenance Dredge Management Plan Advised Wik and Wik Waya operators are employed as Land and Sea Advisors within the Land Sea Management Program. Work includes seedling planting; weed management surveys, and weed management activities; fire management activities; turtle surveys; and feral pig management. Employee	Reviewed EPBC 2016 audit report Reviewed EPBC 2019 audit report Reviewed EPBC 2022 audit report Correspondence Superintendent – Indigenous	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report Review programs that reflect the commitments made in the plans.	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		numbers:7 during 2022, 9 during 2023 and 14 during 2024. Initiatives including exclusively employing Wik and Wik Waya operators within the LSMP; Aurukun Community Commute commenced in 2023 encouraging employment opportunities at Amrun, with return home on days off; Work Readiness Program in Mine Operations linking community led programs to employment; and regular engagement with Aurukun schools and youth organisations in the community to provide information on employment opportunities and support organisations with donations and sponsorship to address employment gaps. Rio Tinto Amrun facebook page 6 July 2023 Community Commute details. Draft Rehabilitation Strategy includes traditional owner employment opportunities (section 10).	Employment & Development Rio Tinto Amrun Facebook page e.g. 6 July 2023		
FERAL PIG MANAGEMENT OFFSET STRATEGY					
Condition 43 EPBC 2010/5642 <i>The approval holder must implement an adaptive Feral Pig Management Offset Strategy to reduce the annual level of feral predation on listed turtle species nests for the period of this approval.</i>					
43.1	Feral Pig Management Offset Strategy must be implemented in accordance with timeframes identified in the approved Strategy.	Feral Pig Management Offset Strategy 2016 Feral Animal Control Annual Report 2022 (21/12/22) – 3 ground control programs and 2 aerial shooting.	Feral Pig MOS Feral Animal Monitoring Annual Reports	Evaluate evidence relating to implementation	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Feral Animal Control Annual Report 2023 (18/12/23) – 3 ground control programs and 2 aerial shooting. Feral Animal Control Annual Report 2024 (24/11/24) – 3 ground control programs and 2 aerial shooting. Turtle nest monitoring occurs with GIS data recorded – sighted GIS databased for turtles (2024 data).	2022, 2023, 2024 Interview Environment Superintendent Turtle data survey records Interview Superintendent Land & Rehab Interview Environment Advisor Interview Land and Sea Specialist Interview Senior Advisor Biodiversity	of the Feral Pig MOS Interviews	
Condition 44 EPBC 2010/5642 <i>The Feral Pig Management Offset Strategy must be implemented at a minimum, in the project area as described in Figure 7-23 of the Final Environmental Impact Statement</i>					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
44.1	Feral Pig Management Offset Strategy must be implemented in accordance with the areas identified in the approved Strategy.	Appendix B shows feral pig control areas, as described in the EIS Figure 7-23. It is noted that the culling program has expanded beyond these limits. GIS Mapping shows areas where feral animal control has been undertaken – sighted 2024 data.	Reviewed Feral Pig MOS GIS Mapping data 2024	Evaluate Feral Pig MOS relating to surveying of turtles	Compliance
Condition 45 EPBC 2010/5642 <i>The Feral Pig Management Offset Strategy must include surveying to develop significantly robust baseline data for listed turtle species nesting in the project area and desired outcomes, benchmarks, readily measurable performance indicators and goals, timeframes for reporting and implementation, corrective actions and contingency measures, and, specify the person/s roles with responsibility for implementing actions. The Feral Pig Management Offset Strategy must provide information detailing Traditional Owner employment opportunities, and mechanisms for reporting the number of local indigenous person/s actually employed in the implementation of this Strategy (consistent with condition 42).</i>					
45.1	Feral Pig Management Offset Strategy must include surveying to develop significantly robust baseline data for listed turtle species nesting in the project area	Section 6.1 Feral Pig MOS describes turtle nest monitoring to develop the data to determine improvements to the survey approach over time.	Reviewed Feral Pig MOS Reviewed EPBC 2016 audit report Reviewed EPBC 2019 EPBC audit report	EPBC 2016 audit report EPBC 2019 EPBC audit report Evaluate Feral Pig MOS relating to surveying of turtles	Compliance
45.2	Feral Pig Management Offset Strategy must include desired outcomes, benchmarks, readily measurable performance indicators and	Appendix D of the Feral Pig MOS is the implementation plan. Consideration should be made to reviewing the Feral Pig Management Offset Strategy specifically to	Reviewed Feral Pig MOS	Evaluate Feral Pig MOS relating to setting of outcomes	Compliance Observation

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	goals, timeframes for reporting and implementation, corrective actions and contingency measures, and, specify the person/s roles with responsibility for implementing actions.	establish new goals and performance indicators and update the Implementation Plan to more accurately reflect the current management actions. It is evident that the Implementation Plan has effectively reduced feral pig numbers, resulting in significant increases in turtle numbers over recent years. Baseline data has now been well established. Furthermore the initial goal to achieve 70 percent reduction in the rate of feral pig nest predation within three years of commencement of controls has been achieved, and subsequently maintained. Additionally, the culling area has been substantially expanded beyond the project area specified in Condition 44. It is noted that the six control options that were initially designed to minimise feral pig predation have now been streamlined to focus on the two most effective options being aerial and ground shooting, based on the data gathered during the turtle survey periods. The Amrun Annual Environmental Monitoring and Annual EPBC Compliance Reports have accurately detailed feral pig eradication campaigns and marine turtle monitoring outcomes. It is well established that the implementation of the FPMOS has enhanced turtle hatchling survivorship by reducing the predation of turtle nests by feral pigs; and it is acknowledged that the feral pig control program has been implemented beyond the required Project Area. It is also noted that the EPBC Permit 2010/5642 does not specify a routine review.	Interview Superintendent Land & Rehab Interview Environment Advisor Interview Land and Sea Specialist Interview Senior Advisor Biodiversity	Interview	

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
45.3	Feral Pig Management Offset Strategy must provide information detailing Traditional Owner opportunities for employment, and mechanisms for reporting the number of local indigenous person/s actually employed in the implementation of this Plan (consistent with condition 42).	Section 9 Feral Pig MOS notes the Traditional Owner employment opportunities extend to the Feral Pig Control Program, particularly with turtle nest monitoring. It is noted that the extent of opportunities in feral pig control shall depend on the final control techniques adopted.	Reviewed Feral Pig MOS	Evaluate Feral Pig MOS relating to Traditional Owner employment opportunities	Compliance
Condition 46 EPBC 2010/5642 <i>The Feral Pig Management Offset Strategy must adhere to the department's Threat Abatement Plan for Predation, Habitat Degradation, Competition and Disease Transmission By Feral Pigs, or its most current version. The Feral Pig Management Offset Strategy must also adhere to the Humane Pest Animal Control: Code of Practice And Standard Operating Procedures (that is currently being updated), or its most current version.</i>					
46.1	The Feral Pig Management Offset Strategy must adhere to the department's Threat Abatement Plan for Predation, Habitat Degradation, Competition and Disease Transmission By Feral Pigs, or its most current version.	Appendix C of the Feral Pig MOS provides a comparison to the <i>Threat Abatement Plan for Predation, Habitat Degradation, Competition And Disease Transmission By Feral Pigs</i> (Department of the Environment and Heritage 2005).	Reviewed Feral Pig MOS	Evaluate Feral Pig MOS relating to Threat Abatement Plan	Compliance
46.2	The Feral Pig Management Offset Strategy must adhere to the Humane Pest Animal Control: Code of Practice and Standard Operating	It is noted in Section 5 Feral Pig MOS that the feral pig control measures adopted shall adhere to the <i>Humane Pest Animal Control: Code of Practice and Standard Operating Procedures</i> (NSW Department of Primary Industries, 2005).	Reviewed Feral Pig MOS Feral Animal Monitoring	Evaluate Feral Pig MOS relating to Humane Control of Feral Pigs	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	Procedures (that is currently being updated), or its most current version.	Feral Animal Monitoring Annual Reports (2022, 2023, 2024) confirm adherence to the Humane Pest Animal Control: Code of Practice.	Annual Reports 2022, 2023, 2024		
Condition 47 EPBC 2010/5642 <i>The findings from the Feral Pig Management Offset Strategy must be used to inform the Marine and Shipping Management Plan at Condition 5 on an ongoing basis.</i>					
47.1	The findings from the Feral Pig Management Offset Strategy must be used to inform the Marine and Shipping Management Plan at condition 5 on an ongoing basis.	Section 8 Feral Pig MOS notes that the findings from the Feral Pig Management Offset Strategy must be used to inform the Marine and Shipping Management Plan under Condition 5 EPBC Act Approval on an ongoing basis. Operations Marine Shipping Management Plan September 2024. Reference is made to the Feral Pig MOS, including development of offset programs for marine turtles. OMSMP notes that the Feral Pig MOS will provide specific direction of the marine operations and addressed in the plan. The OMSMP also includes the latest turtle survey results required by the FPMOS showing that the turtle survey results are used to inform the OMSMP management measures. The Operations MSMP notes that surveys have identified feral pigs as a key threatening process for the survival of turtles along the Amrun Project coastline. As part of the approval conditions to offset potential shipping activities a feral pig offset program was required.	Reviewed OMSMP Reviewed Feral Pig MOS	Review OMSMP Review Feral Pig MOS	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
Condition 48 EPBC 2010/5642 (Variation dated 3 June 2014) <i>The Feral Pig Management Offset Strategy must be submitted to the Minister for approval at least 6 months prior to the commencement of the action. The commencement of the action must not occur until the Feral Pig Management Offset Strategy has been approved by the Minister.</i>					
48.1	Feral Pig Management Offset Strategy must be submitted to the Minister for approval at least 6 months prior to commencement of the action.	EPBC 2016 Audit Report noted that the Feral Pig Management Offset Strategy dated 24/4/15 has been reviewed by officers of the Department and found to meet the relevant conditions. This occurred at least six months prior to commencement of the action 12/5/2016.	Review EPBC 2016 Audit Report	EPBC 2016 Audit Report	Compliance No further auditing required
48.2	Feral Pig Management Offset Strategy must be approved prior to commencement of the action.	EPBC 2016 Audit Report noted that the Feral Pig Management Offset Strategy dated 24/4/15 has been reviewed by officers of the Department and found to meet the relevant conditions. This occurred at least six months prior to commencement of the action 12/5/2016.	Review EPBC 2016 Audit Report	EPBC 2016 Audit Report	Compliance No further auditing required
DOLPHIN OFFSET STRATEGY					
Condition 49 EPBC 2010/5642 <i>The approval holder must implement an Inshore Dolphin Offset Strategy to inform knowledge about the distribution and abundance of local and regional populations of listed dolphin species in the Western Cape York area, and identification of habitat utilised by listed dolphin species.</i> RTA Weipa Inshore Dolphin Offset Strategy South of Embley Project					
49.1	Inshore Dolphin Offset Strategy must be implemented to inform knowledge about the distribution and abundance of local and regional populations of listed dolphin species.	SoE Project Inshore Dolphin Offset Strategy July 2015 specifies that the two principal objectives of the strategy are to provide a better understanding of the distribution, habitat use and abundance of Australian snubfin and Australian humpback dolphins within the study area; and to contribute information toward the	Inshore Dolphin Offset Strategy EPBC 2016 audit report	EPBC 2016 audit report EPBC 2019 audit report	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		National Inshore Dolphin Strategy. Design summary and sampling procedures are described. EPBC 2016 audit report reviewed the Baseline Survey and found the requirements specified in the Strategy were implemented. EPBC 2019 audit report noted that three surveys have been conducted: Amrun Project 2016 Inshore Dolphin Survey Summary – Blue Planet Marine (7-19/7/2016). Amrun Project 2017 Inshore Dolphin Survey Summary – Blue Planet Marine (14-27/10/2017). Amrun Project 2018 Inshore Dolphin Survey Summary – Blue Planet Marine (13-26/10/2018). EPBC 2022 audit report: Amrun Project 2019 Inshore Dolphin Survey Report 9/8/2021 – Blue Planet Marine (11-25 October 2019). Report used all data from previous surveys, as well as the 2019 results. These surveys were conducted in line with the commitments specified in the Inshore Dolphin Offset Strategy. In terms of implementation, all relevant items confirming compliance with the Inshore Offset Dolphin Strategy were demonstrated.	EPBC 2019 audit report EPBC 2022 audit report Interview Environment Superintendent	EPBC 2022 audit report	

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		No items were identified that indicated that relevant actions required by the Inshore Offset Dolphin Strategy had not been undertaken.			
Condition 50 EPBC 2010/5642 <i>The Inshore Dolphin Offset Strategy must be implemented at a minimum, in the marine environment between latitude 12.60°S and latitude 13.35°S and must include provision for the Inshore Dolphin Offset Strategy actions to be undertaken prior to construction, during construction and periodically after construction (for a minimum period of 13 years following the commencement of construction, but not necessarily every year) of the Boyd Port and river facilities.</i>					
50.1	Inshore Dolphin Offset Strategy must be implemented in accordance with the approved Strategy.	EPBC 2016 audit report reviewed the Baseline Survey and found the requirements specified in the Strategy were implemented. EPBC 2019 audit report noted three surveys have been conducted, as specified in the strategy: Amrun Project 2016 Inshore Dolphin Survey Summary – Blue Planet Marine (7-19/7/2016). Amrun Project 2017 Inshore Dolphin Survey Summary – Blue Planet Marine (14-27/10/2017). Amrun Project 2018 Inshore Dolphin Survey Summary – Blue Planet Marine (13-26/10/2018). EPBC 2022 audit report: Amrun Project 2019 Inshore Dolphin Survey Report 9/8/2021 – Blue Planet Marine (11-25 October 2019). The next survey is required within 10 years. In terms of implementation, all relevant items confirming compliance with the Inshore Offset Dolphin Strategy were demonstrated.	Inshore Dolphin Offset Strategy EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report Interview Environment Superintendent	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
50.2	Inshore Dolphin Offset Strategy actions are to be undertaken prior to construction, during construction and periodically after construction.	EPBC 2016 audit report noted the survey prior to construction had been undertaken. EPBC 2019 audit report verified 3 surveys had been undertaken during construction: 7-19/7/2016, 14-27/10/2017, 13-26/10/2018. Construction commenced 12/5/2016. Operations commenced 2/12/2018. Current 2022 audit confirmed survey conducted 11-25/10/2019.	Inshore Dolphin Offset Strategy EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report Interview Environment Superintendent	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report	Compliance No further auditing required
Condition 51 EPBC 2010/5642 <i>The Inshore Dolphin Offset Strategy must contribute to independent research on listed dolphin species, and specify targeted outcomes, benchmarks, readily measureable performance indicators and goals, timeframes for reporting and implementation, and the person/s roles with responsibility for implementing actions. The Inshore Dolphin Offset Strategy must provide information detailing Traditional Owner employment opportunities, and mechanisms for reporting the number of local indigenous person/s actually employed in the implementation of this Strategy (consistent with condition 42).</i>					
51.1	Inshore Dolphin Offset Strategy must contribute to independent research on listed dolphin species.	EPBC 2016 audit report reviewed the Inshore Dolphin Offset Strategy and surveys conducted and found that the Inshore Dolphin Offset Strategy provided research data relating to dolphin population dynamics in relation to distribution, number and behaviour. No change to the Dolphin Strategy has been made or required since this time.	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		EPBC 2022 audit report: Amrun Project 2019 Inshore Dolphin Survey Report (Blue Planet Marine 9/8/2021) states “Having successfully completed surveys and met the Strategy objectives in 2014, 2016, 2017, 2018 and 2019, the combined datasets and analyses from this study provide an important contribution to knowledge about humpback, bottlenose and snubfin dolphins in the region, in particular that the sampling area is part of larger systems for all three species. These data allow for more informed management and planning decisions to be made as the Project continues in its operational phase, as well as to provide information to help assess the conservation status of inshore dolphin species in northern Australian waters.” The Inshore Dolphin Offset Strategy has contributed to independent research on listed dolphin species. It is noted that the Dolphin Offset Strategy requires at least one post-construction survey, which has been conducted. Amrun Project 2019 Inshore Dolphin Survey Report (Blue Planet Marine 9/8/2021) states “Having successfully completed surveys and met the Strategy objectives in 2014, 2016, 2017, 2018 and 2019, the combined datasets and analyses from this study provide an important contribution to knowledge			

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		about humpback, bottlenose and snubfin dolphins in the region, in particular that the sampling area is part of larger systems for all three species. These data allow for more informed management and planning decisions to be made as the Project continues in its operational phase, as well as to provide information to help assess the conservation status of inshore dolphin species in northern Australian waters. Importantly, Wik Waya Traditional Owners (TOs) have been involved in all five surveys, gaining skills and experience in monitoring of dolphin populations and increasing capacity for any future dolphin survey and monitoring opportunities.” Based on this report, further surveys are not required to satisfy Condition 51.			
51.2	Inshore Dolphin Offset Strategy must specify outcomes, benchmarks, readily measurable performance indicators and goals, timeframes for reporting and implementation, corrective actions and contingency measures, and, specify the person/s roles with responsibility for implementing actions.	Section 4 details the targeted outcomes, benchmarks and goals for the implementation of the strategy. Section 5 lists performance indicators. Reporting and implementation are detailed in section 6. Section 8 nominates accountabilities and responsibilities for implementing the Strategy, with the nominated environmental professional for the Project responsible for enabling the surveys to be conducted.	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
51.3	Inshore Dolphin Offset Strategy must provide information detailing Traditional Owner opportunities for employment, and mechanisms for reporting the number of local indigenous person/s actually employed in the implementation of this Plan (consistent with condition 42).	Section 3.3 notes that the Traditional Owners will be given the opportunity to participate in all surveys as observers and to assist researchers during the survey.	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report	Compliance No further auditing required
Condition 52 EPBC 2010/5642 <i>The Inshore Dolphin Offset Strategy must be developed in consultation with the department.</i>					
52.1	Inshore Dolphin Offset Strategy must be developed in consultation with the department.	EPBC 2016 audit report noted that the Strategy has been developed in consultation with DoE and approved by the Department.	Reviewed EPBC 2016 audit report	EPBC 2016 audit report	Compliance No further auditing required
Condition 53 EPBC 2010/5642 <i>The approval holder must fund the Inshore Dolphin Offset Strategy to a minimum of \$800,000 (GST exclusive) and a maximum of \$1,200,000 (GST exclusive).</i>					
53.1	Cost of implementing Inshore Dolphin Offset Strategy must be estimated to be between \$800,000 (GST exclusive) and a maximum of \$1,200,000 (GST exclusive).	EPBC 2016 audit report noted that there was a commitment to fund the Strategy at a minimum of \$800,000 to a maximum of \$1,200,000 (GST exclusive). It is noted that the original fee proposal prepared 26/9/2014 was \$1,192,350. EPBC 2019 audit report noted: 2014-2016 spend was \$258,000 and 2017-2018 spend on the Dolphin Offset Strategy was \$674,000.	Reviewed EPBC 2016 audit report Reviewed EPBC 2019 audit report	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		2019 spend was \$285,000 – invoice sighted. It is noted that a total of \$1,217,000 has been spent on the dolphin surveys relating to the implementation of the Dolphin Offset Strategy. This amount exceeds the upper limit specifies in Condition 53 and therefore the evidence indicated a technical administrative non-compliance, and was reported as such. It is noted that the Department (DAWE) acknowledged via email (3/9/2021) that the reporting requirements under Condition 68 have been met. This exceedance of money spent on the dolphin strategy was reported in the 2022 EPBC audit report. It was also reported in the 2022 EPBC annual compliance report and highlighted in the email sent (11/8/22). Email from DCCEEW confirms the department has reviewed this minor administrative non-compliance and decided no further compliance action will be taken in relation to this matter. As reported at Condition 51.1 the requirements of the Dolphin Strategy have been met.	Reviewed EPBC 2022 audit report Inshore Dolphin Offset Strategy South of Embley Project Email to DCCEEW 11/8/22 Email from DCCEEW 10/10/22 Interview Environment Superintendent		
Condition 54 EPBC 2010/5642 <i>The findings from the Inshore Dolphin Offset Strategy, including corrective actions and contingency measures relating to operations, must be used to inform the Marine and Shipping Management Plan at condition 5 on an ongoing basis.</i>					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
54.1	Findings from the Inshore Dolphin Offset Strategy must be used to inform Marine and Shipping Management Plan from condition 8, stage ii.	Results of the five dolphin survey results required by the Inshore Dolphin Offset Strategy informed the updated Operations Marine Shipping Management Plan April 2021, as required by condition 8, stage ii.	Reviewed OMSMP EPBC 2022 audit report	Review OMSMP EPBC 2022 audit report	Compliance No further auditing required
Condition 55 EPBC 2010/5642 (Variation dated 3 June 2014) <i>The Inshore Dolphin Offset Strategy must be submitted to the Minister for approval at least 6 months prior to the commencement of the action. The commencement of the action must not occur until the Inshore Dolphin Offset Strategy has been approved by the minister.</i>					
55.1	Inshore Dolphin Offset Strategy must be submitted to the Minister for approval at least 6 months prior to commencement of the action.	EPBC 2016 audit report noted that the Dolphin Offset Strategy was submitted on 14/5/2013. Commencement of the action was 12/5/2016.	Reviewed EPBC 2016 audit report	EPBC 2016 audit report	Compliance No further auditing required
55.2	Inshore Dolphin Offset Strategy must be approved prior to commencement of the action.	EPBC 2016 audit report noted a letter dated 28/7/15 referring to updated Inshore Dolphin was found to meet the requirements of the relevant conditions and on this basis, as a delegate of the Minister, the Strategy was approved.	Reviewed EPBC 2016 audit report	EPBC 2016 audit report	Compliance No further auditing required
SURVEY DATA					
Condition 56 EPBC 2010/5642 <i>All survey data and methodology collected for the project must be recorded in accordance with approved management plans. When requested by the department, the approval holder must provide to the department survey data and information related to matters of national environmental significance. This information must be provided within 30 business days of request, or in a timeframe agreed to by the department in writing. The department may use the survey data for other purposes. The approval holder must also provide the survey data and methodology, within 30 business days, to anyone who requests the survey data and methodology in writing. Notification of the availability of the survey data and methodology must be provided on the approval holder's website for the duration of this approval.</i>					
56.1	Survey data and methodology collected for the project must be recorded in accordance	Since the EPBC 2022 audit, the following surveys have been conducted and reported in accordance with the approved management plans:	Annual Environmental Monitoring	Review sample of survey data and	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	with approved management plans.	Fauna and flora surveys, as reported in this checklist at Conditions 22. Weed management program - 2022 Amrun Periodic (three yearly) Weed Survey Ecological Report (Ecotone, November 2022). Marine turtle monitoring 2022, 2023, 2024. Marine pest monitoring 2022, 2023, 2024. Details were reported in Annual Environmental Monitoring Reports 2022, 2023, 2024. No examples were identified where required surveys were not conducted.	Reports 2022, 2023, 2024 Weed survey report 2022	methodology when reviewing implementation of the approved management plans	
56.2	Records must be made available within 30 business days of request by the Department. Such documents may be subject to audit by the Department and used to verify compliance with the conditions of approval.	No requests for records have been made by the Department.	Interview Environment Superintendent	N/A	Not applicable
56.3	Records must be made available within 30 business days on request by anyone	No requests for records have been made by the Department.	Interview Environment Superintendent	N/A	Not applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	who requests the survey data in writing.				
56.4	Notification of the availability of the survey data and methodology must be provided on the approval holder's website for the duration of this approval.	The Amrun Project website https://www.riotinto.com/operations/australia/weipa specifies an email address "for requests or enquiries about survey data and methodology collected by the Amrun Project". Under downloads section on website. All reports are available on the website, including survey data and methodology.	Reviewed website and noted availability of reports	Review website	Compliance
WEBSITE Condition 57 EPBC 2010/5642 <i>Every 12 months after the commencement of the action, unless otherwise agreed to in writing by the Minister, the approval holder must publish on their website, for the duration of the project (including decommissioning), all the survey methodology, reports and related analysis of survey data for current program/s, plants, strategies or other conditions specified in this approval for each individual matter of national environmental significance. The department must be notified within ten (10) business days of publication.</i>					
57.1	Every 12 months after the commencement of the action all survey methodology, reports and related analysis of survey data for current program/s, plans, strategies or other conditions specified in this approval for each individual matter of national environmental significance	Commencement of the action occurred 12/5/2016. Annual environmental monitoring reports that include pre-disturbance monitoring, weed management, fire management, feral animal management, marine turtle monitoring and marine pest monitoring are published on the website. In the current audit period, the following have been published.	Project website review Interview Environment Superintendent	Review project website	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	must be published on Project website.	Amrun Project Annual Environmental Monitoring 2022 (12/5/21 – 11/5/22). Amrun Project Annual Environmental Monitoring 2023 (12/5/22 – 11/5/23). Amrun Project Annual Environmental Monitoring 2024 (12/5/23 – 11/5/24) There was no evidence to indicate that survey results or reports related to current programs and plans have not been published on the Project website.			
57.2	The department must be notified within ten (10) business days of publication.	Annual compliance report 2022 was submitted via email 11/8/2022. The letter stated that the compliance report was placed on the Amrun project website on 11/8/2022. Annual compliance report 2023 was submitted via email 11/8/2023. The letter stated that the compliance report was placed on the Amrun project website on 11/8/2023. Annual compliance report 2024 was submitted via email 9/8/2024. The letter stated that the compliance report was placed on the Amrun project website on 9/8/2024.	Letter to DCCEEW 11/8/22 Letter to DCCEEW 11/8/23 Letter to DCCEEW 9/8/24	Verification of departmental notification	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		All letters were written noting compliance with reporting requirements relevant to Conditions 57, 68 and 71.			
Condition 58 EPBC 2010/5642 <i>Within five (5) business days from this approval, the approval holder must publish the Final Environmental Impact Statement on their website for the duration of the project, including decommissioning.</i>					
58.1	Within five (5) business days from this approval the Final Environmental Impact Statement must be published on Project website and remain on the website for the duration.	EPBC 2016 audit report noted Final EIS (Commonwealth) available on Project website within five days of EPBC approval. South of Embley Environmental Impact Statement was sighted on website.	EPBC 2016 Audit Report Reviewed website	EPBC 2016 Audit Report Review website	Compliance
Condition 59 EPBC 2010/5642 <i>Unless otherwise agreed to in writing by the Minister the approval holder must publish, for the life of the project including decommissioning, all current approved programs/s, plan/s, review/s (including the Independent Peer Reviews) or strategies referred to in these conditions of approval on their website. Each of the approved program/s, plan/s or strategies (including revised versions) must be published on the approval holder's website within one (1) month of approval.</i>					
59.1	Within one (1) month of approval by the Minister unless otherwise agreed to in writing by the Minister, the Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s, Terrestrial Management Plan,	EPBC 2016 and EPBC 2019 audit reports noted that the relevant management plans and associated independent peer reviews were available on the project website. Current audit confirmed these documents are published on current Project website. http://www.riotinto.com/australia/key-project-documents-16128.aspx	Review EPBC 2016 Audit Report Review EPBC 2019 Audit Report Review EPBC Audit Report 2022	EPBC 2016 Audit Report EPBC 2019 Audit Report EPBC 2022 Audit Report Review website	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy (including independent peer reviews) must be published on Project website.	Temporary Barge Plan July 2015 (confirmed 10/5/2022) Temporary Barge Plan July 2015 – Response to Reviewer (14/12/14) (confirmed 10/5/2022) Capital Dredge Management Plan – Port (Initial Capital Dredging) November 2015 (confirmed 10/5/2022) Capital Dredge Management Plan – Port – Response to Reviewer (13/8/15) (confirmed 10/5/2022) Capital Dredge Management Plan – River Facilities 16 September 2015 (confirmed 10/5/2022) Capital Dredge Management Plan – River Facilities - Response to Reviewer (11/11/14) (confirmed 10/5/2022) Maintenance Dredge Management Plan – Port (approved 15/3/18). Construction Marine and Shipping Management Plan 26 July 2017 (confirmed 10/5/2022) Construction Marine and Shipping Management Plan – Response to Reviewer (14/7/15) (confirmed 10/5/2022) Terrestrial Management Plan 14 October 2015 Terrestrial Management Plan – Response to Reviewer (2/1/15) (confirmed 10/5/2022) Inshore Dolphin Strategy July 2015) (confirmed 10/5/2022) Inshore Dolphin Strategy – Response to Reviewer (24/11/15) (confirmed 10/5/2022) Feral Pig Management Offset Strategy August 2015) (confirmed 10/5/2022)		Review correspondence to demonstrate date documents were uploaded to website	

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Feral Pig Management Offset Strategy – Response to Reviewer) (confirmed 10/5/2022) Operations Marine Shipping Management Plan April 2021 (confirmed 10/5/2022) Operations Marine Shipping Management Plan April 2021 – Response to Reviewer (6/8/2018) (confirmed 10/5/2022) Amrun port and river facilities long-term maintenance dredge management plan 2021 – 2031 January 2021 (confirmed 10/5/2022) Operations Marine Shipping Management Plan September 2024 (confirmed 10/9/24) screen shot email from Publication Team confirming upload Rehabilitation Strategy – not yet approved by the Minister, therefore not yet included on website.			
PEER REVIEW					
Condition 60 EPBC 2010/5642 <i>Unless otherwise agreed in writing by the Minister, each program/s, plan/s, or strategies specified in the conditions must be independently peer reviewed prior to submission to the Minister for approval. The approval holder must nominate an Independent Peer Reviewer to the Minister. The person/organisation/technical committee conducting the independent peer review must be approved by the Minister, prior to the commencement of the review. The independent peer review criteria must be agreed to by the Minister and any reviews undertaken must address the criteria to the satisfaction of the Minister.</i>					
60.1	Independent Peer Reviews must be completed for the Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging	EPBC 2016 audit report reviewed the following: Temporary Barge Plan July 2015 Temporary Barge Plan July 2015 – Response to Reviewer (14/12/14) Capital Dredge Management Plan – Port (Initial Capital Dredging) November 2015	Review EPBC 2016 audit report Review EPBC 2019 audit report	Review EPBC 2016 audit report Review EPBC 2019 audit report	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy.	Capital Dredge Management Plan – Port – Response to Reviewer (13/8/15) Capital Dredge Management Plan – River Facilities 16 September 2015 Capital Dredge Management Plan – River Facilities - Response to Reviewer (11/11/14) Construction Marine and Shipping Management Plan 19 November 2015 Construction Marine and Shipping Management Plan – Response to Reviewer (14/7/15) Terrestrial Management Plan 14 October 2015 Terrestrial Management Plan – Response to Reviewer Inshore Dolphin Strategy July 2015 Inshore Dolphin Strategy – Response to Reviewer (24/11/15) Feral Pig Management Offset Strategy August 2015 Feral Pig Management Offset Strategy – Response to Reviewer Feral Pig Management Offset Strategy July 2016 Feral Pig Management Offset Strategy – Response to Reviewer Maintenance Dredge Management Plan – Port March 2018 Maintenance Dredge Management Plan – Port Response to Reviewer Amrun port and river facilities: long-term maintenance dredge management plan Independent Peer Review 31 August 2020	Review EPBC 2022 audit report Interview Principal Advisor Approvals and Compliance	Review EPBC 2022 audit report Review evidence of Independent Peer Reviews being conducted prior to submission Interview	

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Rehabilitation Strategy – not yet approved by the Minister. Peer review completed 20/4/21 and submitted with Rehabilitation Strategy.			
60.2	Independent Peer Reviewers must be approved by the Minister prior to the commencement of the review for the Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy.	EPBC 2016 audit report noted approval of nominated independent peer reviewers and review criteria for: Mr Stephen Raaymakers – Temporary Barge Plan and Construction Marine and Shipping Management Plan Dr Jim Stoddart – Capital Dredge Management Plan – River Facilities, Maintenance Dredge Management Plans, Long-Term Dredge Management Plan Dr Lyndon Brooks – Inshore Dolphin Offset Strategy Dr David Dique – Terrestrial Management Plan Dr Andrew Bengsen – Feral Pig Management Offset Strategy It was noted that the Officers of the Post Approvals Section had reviewed the information provided and was satisfied that the peer review criteria, qualifications, experience and the level independence of the nominated peer reviewers meet the requirements of the relevant approval conditions. It was noted that, as a delegate of the Minister, the three nominated peer reviewers and the review criteria for the above plans and strategy were approved. EPBC 2019 audit report noted approval Letter dated 3/4/2018 approving Dr James Stoddart as the independent peer review and approval of	Review EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report Interview Principal Advisor Approvals and Compliance	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report Interview	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		proposed review criteria for the Operations Shipping Management Plan. Letter dated 24/7/2019 approving Dr James Stoddart as the independent peer review and approval of proposed review criteria for the Long-term Maintenance Dredge Management Plan. Rehabilitation Strategy – not yet approved by the Minister. Approval of peer reviewer provided in DAWE letter 9/6/21.			
60.3	Independent peer review criteria must be agreed to by the Minister for the Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy	EPBC 2016 audit report noted approval of nominated independent peer reviewers and review criteria for: Mr Stephen Raaymakers – Temporary Barge Plan and Construction Marine and Shipping Management Plan Dr Jim Stoddart – Capital Dredge Management Plan – River Facilities Dr Lyndon Brooks – Inshore Dolphin Offset Strategy Dr David Dique – Terrestrial Management Plan Dr Andrew Bengsen – Feral Pig Management Offset Strategy It was noted that the Officers of the Post Approvals Section had reviewed the information provided and was satisfied that the peer review criteria, qualifications, experience and the level independence of the nominated peer reviewers meet the requirements of the relevant approval conditions. It	Review EPBC 2016 audit report Review EPBC 2019 audit report Review EPBC 2022 audit report	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		was noted that, as a delegate of the Minister, the three nominated peer reviewers and the review criteria for the above plans and strategy were approved. EPBC 2019 audit report Letter dated 3/4/2018 approving Dr James Stoddart as the independent peer review and approval of proposed review criteria for the Operations Shipping Management Plan. Letter dated 31/8/2017 approving Dr James Stoddart as the independent peer review and approval of proposed review criteria for the Dredge Management Plan – Port (Maintenance Dredging). Letter dated 24/7/2019 approving Dr James Stoddart as the independent peer review and approval of proposed review criteria for the Long-term Maintenance Dredge Management Plan. DAWE Letter dated 11/6/21 approving peer review criteria for Rehabilitation Strategy.			
60.4	Independent Peer Reviews must address the criteria to the satisfaction of the Minister for the Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s,	The EPBC 2016 audit report noted that for each document submitted, criteria for independent peer review were submitted and approved by DoE. Subsequently documents with independent peer review reports which were assessed by DoE and ultimately approved in line with evidence shown in Condition 60. This demonstrates Independent Peer	Review of EPBC 2016 audit report Review of EPBC 2019 audit report	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	Maintenance Dredging Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy	Reviews have addressed the criteria to the satisfaction of the Minister. The 2019 audit showed that this also occurred for the Operations Marine Shipping Management Plan and the Dredge Management Plan – Port (Maintenance Dredging). Rehabilitation Strategy – not yet approved by the Minister.	Review of EPBC 2022 audit report		
Condition 61 EPBC 2010/5642 <i>The reviews undertaken for condition 60 must include an analysis of the effectiveness of the avoidance and mitigation measures in meeting the objectives, targets or management measures identified in the program/s, plants or strategies being reviewed.</i>					
61.1	Independent Peer Reviews must include an analysis of the effectiveness of the avoidance and mitigation measures in meeting the objectives, targets or management measures identified in the Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy.	The EPBC 2016 audit report noted that for each document submitted, criteria for independent peer review were submitted and approved by DoE. Subsequently documents with independent peer review reports which were assessed by DoE and ultimately approved in line with evidence shown in Condition 60. This demonstrates Independent Peer Reviews have addressed the criteria to the satisfaction of the Minister. It was noted that the peer reviews included an analysis of the effectiveness of the avoidance and mitigation measures in meeting the objectives, targets or management measures identified in the Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy,	Review of EPBC 2016 audit report Review of EPBC 2019 audit report Review of EPBC 2022 audit report	EPBC 2016 audit report EPBC 2019 audit report EPBC 2022 audit report	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy. The 2019 audit showed that the peer reviews included the same level of detail for the Operations Marine Shipping Management Plan and the Dredge Management Plan – Port (Maintenance Dredging). DoEE approved the peer reviews for both documents. Long-term Maintenance Dredge Management Plan has been accepted following independent peer review. Rehabilitation Strategy – not yet approved by the Minister.			
Condition 62 EPBC 2010/5642 <i>Unless otherwise specified in these conditions or notified in writing by the Minister, the approval holder must provide to the Minister, a copy of all advice and recommendations made by the Independent Peer Reviewer for program/s, plants, or strategies, and an explanation of how the advice and recommendations will be implemented, or an explanation of why the approval holder does not propose to implement certain recommendations.</i>					
62.1	Independent Peer Reviews including all advice and recommendations must be provided to the Minister for Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s,	EPBC 2016 audit report noted that each independent review specifies the review criteria, independent review comments and the response to the peer review comments. The independent peer review report including all advice and recommendations and the responses have been submitted to the DoE and subsequently approved for all plans and strategies. The 2016 EPBC audit report covered the Temporary Barge Plan, Marine and Shipping Management Plan	2016 EPBC Audit Report 2019 EPBC Audit Report 2022 EPBC Audit Report	2016 EPBC Audit Report 2019 EPBC Audit Report 2022 EPBC Audit Report	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy.	(construction), Dredging Management Plan River and Ports, Terrestrial Management Plan, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy. The EPBC 2019 audit reviewed the independent peer reviews for the Maintenance Dredging Management Plan and the Operations Shipping Management Plan. Long-term Maintenance Dredge Management Plan 2021-2031 accepted by Minister. Rehabilitation Strategy Peer Review was submitted with the Rehabilitation Strategy, which has not yet approved by the Minister.		Review independent review reports Review response to reports	
62.2	Rio Tinto responses to Independent Peer Reviews must be provided to the Minister for Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy.	Each independent review specifies the review criteria, independent review comments and the response to the peer review comments. The independent peer review report including all advice and recommendations and the responses have been submitted to the DoE and subsequently approved for all plans and strategies. Correspondence relating to the approval is detailed throughout this checklist. The 2016 EPBC audit report covered the Temporary Barge Plan, Marine and Shipping Management Plan (construction), Dredging Management Plan River and Ports, Terrestrial Management Plan, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy.	EPBC 2016 Audit Report EPBC 2019 Audit Report	EPBC 2016 Audit Report EPBC 2019 Audit Report	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		The 2019 EPBC Audit Report reviewed the independent peer reviews for the Maintenance Dredging Management Plan and the Operations Shipping Management Plan. Independent review of Long-term Maintenance Dredge Management Plan reviewed. Rehabilitation Strategy not yet approved.			
Condition 63 EPBC 2010/5642 <i>If the Minister is not satisfied that the final revised version of the plan/s, program/s or strategies specified in this approval adequately addresses the condition/s specified in the approval, the approval holder will be notified in writing by the Minister that they must update a plan/s, program/s or strategies to meet the condition/s that have not been adequately addressed.</i>					
63.1	If notification provided by the Minister that condition/s specified in the approval are not adequately addressed any approved plan/s, program/s or strategies must be updated.	No notification provided – not applicable.	N/A	N/A	Not applicable
Condition 64 EPBC 2010/5642 <i>For any plan/s and/or strategy specified in this approval that is to be approved by the Minister, the approval holder must ensure the Minister is provided at least 60 business days for review and consideration of the programs/s, plan/s, or strategies specified in this approval, unless otherwise agreed in writing by the Minister. This does not apply to urgent changes required to protect the environment or repair or mitigate any damage that may or will be, or has been, caused by the action to any matter protected by Part 3 of the EPBC Act for which the approval has effect.</i>					
64.1	Minister must be provided at least 60 business days for review and consideration of the Temporary Barge Plan,	EPBC 2016 audit report noted that the Temporary Barge Plan, Marine and Shipping Management Plan, Dredging Management Plan-Port, Dredging Management Plan-River, Terrestrial	Reviewed EPBC 2016 audit report	EPBC 2016 audit report	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy.	Management Plan, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy have all been approved by the Minister prior to the commencement of the relevant activity, where that activity has actually commenced. EPBC 2019 audit report noted that the Operations Marine Shipping Management Plan was submitted to and approved by the Minister prior to commencement of shipping. Maintenance Dredge Management Plan – Port was submitted and approved prior to the first occurrence of maintenance dredging. Rehabilitation Strategy submitted 12/12/22, however not yet approved by Minister.	Reviewed EPBC 2019 audit report Reviewed EPBC 2022 audit report Email to DCCEEW 12/12/22 Details noted throughout this checklist.	EPBC 2019 audit report EPBC 2022 audit report Evaluate all relevant plans to ensure these were approved prior to commencement	
Condition 65 EPBC 2010/5642 <i>To avoid duplication, the approval holder may provide the Minister with any plan/s, program/s or strategies prepared for the State provided the plan/s, program/s or strategies meets the conditions specified in this approval. The plan/s, program/s or strategies must include a cross reference table that clearly identifies:</i> <i>a. the condition specified in this approval for which the plan/s, strategy or program/s is being provided; and</i> <i>b. the relevant folder, chapter, section number and page number in the plan/s, program/s or strategies where the condition has been addressed.</i>					
65.1	If any plan/s, program/s or strategies prepared for the State are to be provided to the Minister for approval they must include a cross reference table that clearly identifies:	EPBC audit reports for 2016, 2019 and 2022 all noted that all plans reviewed included the appropriate cross reference table. For example, Long-term Maintenance Dredge Management Plan – Table 2 specifies the relevant EPBC Approval Conditions and the relevant section to address the Conditions are listed.	EPBC 2016 audit report EPBC 2019 audit report	EPBC 2016 Audit Report EPBC 2019 Audit Report	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	a. the condition specified in this approval for which the plan/s, strategy or program/s is being provided; and b. the relevant folder, chapter, section number and page number in the plan/s, program/s or strategies where the condition has been addressed.		EPBC 2022 audit report	EPBC 2022 Audit Report	
COMMENCEMENT DATES					
Condition 66 EPBC 2010/5642					
<i>Within ten (10) days after the commencement of preliminary works, construction, operation and/or commencement of the action, the approval holder must advise the Minister in writing of the actual date of commencement.</i>					
66.1	Within 10 days following commencement of preliminary works written notification must be provided to the Minister advising the actual date of commencement.	Reviewed EPBC audit 2016. Preliminary works commenced 21/10/2015.	Reviewed during EPBC audit 2016	EPBC Audit Report 2016	Compliance No further auditing required
66.2	Within 10 days following commencement of construction written notification must be provided to the Minister advising the actual date of commencement	Letter dated 18/5/2016 to Department of Environment advising of commencement of action and commencement of construction as being 12/5/2016. This notification was provided to the Minister within 10 days.	Reviewed during EPBC audit 2016 Reviewed during EPBC audit 2019	EPBC Audit Report 2016 EPBC Audit Report 2019	Compliance No further auditing required

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
66.3	Within 10 days following commencement of operation written notification must be provided to the Minister advising the actual date of commencement	Letter dated 7/12/2018 advising Department of the Environment and Energy that operations commenced on 2/12/2018.	Letter dated 7/12/2018 re commencement of operations	EPBC Audit Report 2019	Compliance No further auditing required
66.4	Within 10 days following commencement of the action written notification must be provided to the Minister advising the actual date of commencement.	Commencement of the action is defined in EPBC Permit 2010/5642 b) any works that are required to be undertake for construction (except exploration, site investigation and preliminary works). Construction commenced 12/5/2016. Letter dated 18/5/2016 to Department of Environment advising of commencement of action and commencement of construction as being 12/5/2016. This notification was provided to the Minister within 10 days.	Reviewed during EPBC audit 2016 Reviewed during EPBC audit 2019	EPBC Audit Report 2016 EPBC Audit Report 2019	Compliance No further auditing required
RECORD KEEPING					
Condition 67 EPBC 2010/5642 <i>The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the plan/s or strategies as specified in these conditions and make them available upon request to the department. Such records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the department's website. The results of audits may also be published through the general media.</i>					
67.1	Accurate records of activities must be maintained in relation to activities associated with or relevant to the conditions of approval.	Throughout the audit it was evident that appropriate and accurate records substantiating activities relevant to the approval were maintained. This extended to monitoring, training, dredging, surveys, inspection checklists and correspondence.	Assessed throughout audit	Assess records throughout audit	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
67.2	Records must be made available on request by the Department. Such documents may be subject to audit by the Department and used to verify compliance with the conditions of approval.	It was advised that no request has been made by the Department to make records available, therefore not applicable.	Interview Environment Superintendent	Interview	Not applicable
REPORTING					
Condition 68 EPBC 2010/5642 <i>Within three (3) months of every 12 month anniversary of commencement of the action the approval holder must publish a report on their website, for the duration of the project including decommissioning, addressing compliance with the conditions of this approval over the previous 12 months, including implementation of any management plan/s or strategies as specified in the conditions. Non-compliance with any of the conditions of this approval must be reported to the department at the same time as the compliance report is published. Within five (5) days after publication, the person taking the action must provide the Minister with a copy of the report/s.</i>					
68.1	Compliance report/s must be published within three (3) months of every 12 month anniversary of commencement of the action.	Annual compliance report 2022 was submitted via email 11/8/2022. The letter stated that the compliance report was placed on the Amrun project website on 11/8/2022. Annual compliance report 2023 was submitted via email 11/8/2023. The letter stated that the compliance report was placed on the Amrun project website on 11/8/2023. Annual compliance report 2024 was submitted via email 9/8/2024. The letter stated that the compliance report was placed on the Amrun project website on 9/8/2024.	Letter dated 11/8/2022 Letter dated 11/8/2023 Letter dated 9/8/2024 Project website	Evaluate correspondence relating to compliance reporting Review project website	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Annual compliance reports have been published on the Project website within the three month period of the 12 month anniversary of commencement of the action, as require by Condition 68.1.			
68.2	Non-compliance with any of the conditions of this approval must be reported to the department at the same time as the compliance report/s is published.	2022 EPBC Annual Compliance Report states one non-compliances related to condition 53 exceedance of the upper limit of \$1,200,000 associated with the Inshore Dolphin Offset Strategy. Email from DCCEEW confirms the department has reviewed this minor administrative non-compliance and decided no further compliance action will be taken in relation to this matter. 2023 EPBC Annual Compliance Report states two non-compliances were identified referencing the same administrative error which related to Condition 9 of the SD permit and Condition 19 of the EPBC permit. This was later found to be an error and should have been reported as no non-compliances. The Monitoring and Management Plan referred to in Condition 9 of the SD permit 2020/3999 is defined as the Long-term Dredge Management Plan, which was available of the website. Condition 19 of this EPBS Permit 2010/5642 requires implementation of the SD (hence the reason for reporting a non-compliance). In response the Department noted the reported non-compliance with condition 19. This incident has been	Letter dated 11/8/2022 Email from DCCEEW 10/10/22 Letter dated 11/8/2023 Letter dated 9/8/2024 Interview Environment Superintendent Interview Principal Advisor Approvals and Compliance	Evaluate correspondence relating to compliance reporting	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		recorded and may be taken into account if further non-compliances occur, however the Department has chosen to take no further action at this stage. 2024 EPBC Annual Compliance Report states no non-compliances.			
68.3	Copy/s of the compliance report/s must be provided to the Minister within five (5) days after publication.	2022 Annual compliance report was dated 11/8/2022 and provided to the department 11/8/2022. DCCEEW email response 21/4/2023. 2023 Annual compliance report was dated 11/8/2023 and provided to the department 11/8/2023. DCCEEW email response 3/1/2024. 2024 Annual compliance report was dated 9/8/2024 and provided to the department 9/8/2024. Compliance reports are provided to the Minister within 5 days of publication.	Letter dated 11/8/22 Letter dated 11/8/23 Letter dated 9/8/24	Review correspondence relating to advice to Minister	Compliance
AUDITING					
Condition 69 EPBC 2010/5642 <i>Every three years from the date of this approval, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.</i>					
69.1	Every three years from the date of this approval independent audit/s of compliance with the	First independent audit - Ardent Group Independent Compliance Audit Report EPBC 2010/5642 version 1 dated 17 June 2016.	EPBC audit report 2016	EPBC audit report 2016	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	conditions of approval must be conducted and audit report submitted to the Minister.	Second independent audit - Ardent Group Independent Compliance Audit Report EPBC 2010/5642 version 1 dated 15 May 2019. Third independent audit - Ardent Group Independent Compliance Audit Report EPBC 2010/5642 version 1 dated 15 June 2022 submitted via email 27/6/2022. Email 27/6/22 from DCCEEW acknowledging receipt of EPBC 2022 audit report. Fourth independent audit – current audit (March 2025). Independent audit conducted every three years. Evidence reviewed confirmed reports submitted to the Minister, as required.	EPBC audit report 2019 EPBC 2022 audit report Email 27/6/22 to DCCEEW Email 27/6/22 from DCCEEW	EPBC audit report 2019 EPBC 2022 audit report Current audit report Review correspondence relating to submission of audit report	
69.2	The independent auditor/s must be approved by the Minister prior to the commencement of the audit.	DAWE letter dated 5/2/2025 Reference EPBC 2010/5642 approves nominated independent auditor from Ardent Group Pty Ltd.	DCCEEW Letter dated 5/2/2025	Review correspondence relating to auditor approval	Compliance
69.3	Audit criteria must be agreed to by the Minister and the audit report/s must address the criteria to the satisfaction of the Minister.	DCCEEW letter dated 5/2/2025 Reference EPBC 2010/5642 approves audit criteria submitted on 15/1/25 for the current audit. Relevant to the 2022 EPBC audit -	Email to DCCEEW 15/1/25 DCCEEW Letter dated 5/2/2025	Review correspondence relating to audit criteria	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Submission of the 2022 EPBC audit report (V1 dated 15/6/22) occurred via email submission of the audit report on 27/6/22. Letter dated 11/10/2022 confirms that the 2022 EBC audit report satisfied the requirements of the approval under the EPBC Act. Letter noted that in relation to the two non-compliances raised (late submission of revised MSMP with respect to Condition 10; and exceedance of the maximum amount specified in the Inshore Dolphin Offset Strategy for the funding of dolphin surveys, required by Condition 53), the department considered the information provided in the 2022 audit report and noted there was no significant environmental impact resulting from the non-compliances therefore no further action will be taken.	Email 27/6/22 to DCCEEW Email 27/6/22 from DCCEEW Letter DCCEEW 11/10/22		
SENSITIVE INFORMATION Condition 70 EPBC 2010/5642 <i>For the purposes of reporting at Condition 68, where material required under condition 41 and Condition 42 is culturally sensitive and cannot be disclosed at the explicit and written consent of the relevant Indigenous people with rights, claims or interests in the area, the approval holder must advise the department of the extent to which it cannot comply with condition 41 and Condition 42 or that reason.</i>					
70.1	The department must be advised where material required under condition 41 and condition 42 is culturally sensitive and cannot be disclosed for the purposes of reporting at condition 68 at	There have been no examples where material is culturally sensitive and cannot be disclosed.	N/A	N/A	Not applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	the explicit and written consent of the relevant Indigenous people with rights, claims or interests in the area.				
70.2	The department must be advised of the extent to which Rio Tinto cannot comply with condition 41 and 42 or that reason.	There have been no examples where material is culturally sensitive and cannot be disclosed.	N/A	N/A	Not applicable
RECORD REGISTER					
Condition 71 EPBC 2010/5642 <i>Where the conditions require the approval holder to submit a program/s, plan/s or strategies for the Minister's approval, the approval holder must maintain a register recording:</i> <i>a. the date on which each plan was approved by the Minister;</i> <i>b. if a plan has not been approved, the date on which it was, or is expected to be, submitted to the Minister;</i> <i>c. the dates on which reports on the outcomes of reviews have been approved by the Minister; and,</i> <i>d. the dates on which the subsequent reviews are due.</i>					
71.1	A register must be maintained which records the dates required by a. to d. for the Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset	South of Embley Bauxite Mine and Port Development (Amrun Project) (EPBC 2010/5642) Register of Programs, Plans and Strategies) lists document, independent review approved by Minister, independent review submitted to Minister, management plan and independent review expected to be submitted to Minister, comments received, response to comments (subsequent reviews i.e. #2 and #3, as relevant). Dates recorded for Inshore Dolphin Offset Strategy, Feral Pig Offset Strategy, Temporary Barge Plan, Terrestrial Management Plan, Terrestrial Management Plan Review, River Facilities	Reviewed Register	Review register to ensure it is complete in line with the listed requirements.	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
	Strategy and Inshore Dolphin Offset Strategy.	Capital Dredge Management Plan, Port Dredge Management Plan – Initial Capital Dredge Plan, Construction Marine and Shipping Management Plan, Operations Marine Shipping Management Plan, Operations Marine Shipping management Plan Review, Dredge Management Plan – Port (Maintenance Dredging 2018 – 2020), Dredge Management Plan – Port (Maintenance Dredging Long Term). Due dates are recorded for required reviews of management plans e.g. Operations Marine Shipping Management Plan reviews 2026, 2029 then every 5 years. Terrestrial Management Plan due 2025.			
71.2	The register must be submitted to the department at the time the annual compliance report is published.	Letter dated 11/8/2022 to Department of Climate Change, Energy, the Environment and Water in reference to annual reporting and publication requirements. The EPBC Register of Programs, Plans and Strategies Register was attached to the letter with the annual compliance report. Letter dated 11/8/2023 to Department of Climate Change, Energy, the Environment and Water in reference to annual reporting and publication requirements. The EPBC Register of Programs, Plans and Strategies Register was attached to the letter with the annual compliance report.	Letter dated 11/8/22 Letter dated 11/8/23 Letter dated 9/8/24	Review correspondence to ensure the register is submitted at the time of the annual compliance report	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
		Letter dated 9 August 2024 to Department of climate Change, Energy, the Environment and Water in reference to annual reporting and publication requirements. The EPBC Register of Programs, Plans and Strategies Register was attached to the letter with the annual compliance report (attachment 4).			
Condition 72 EPBC 2010/5642 <i>If the approval holder wishes to carry out any activity otherwise than in accordance with a programs/s. plan/s or strategies as specified in the conditions, the approval holder must submit to the department for the Minister's written approval a revised version of that programs/s, plan/s or strategies. The varied activity must not commence until the Minister has approved the varied programs/s, plants or strategies writing. The Minister will not approve a varied programs/s, plan/s or strategies unless the revised programs/s, plants or strategies would result in an equivalent or improved environmental outcome over time. If the Minister approves the revised programs/s, plan/s or strategies they must be implemented in place of the plants or strategies originally approved.</i>					
72.1	Where changes have been required in activities described in the Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy, revised versions of the plan(s) must be submitted to the Minister for approval.	In the current audit period, changes have been made to: RTA Weipa SoE Project Operations Marine and Shipping Management Plan September 2024 (dated 2/9/2024, approved by DCCEEW 2/9/24), as required by Condition 10.2	Interview Environment Superintendent Operations Marine and Shipping Management Plan 2024 Email to DCCEEW dated 19/4/24	Review of documents relating to revision of plans Interview	Compliance

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
72.2	Approval for varied management plan(s) and/or monitoring programs(s) must be received from the Minister in writing prior to commencement of the variation.	RTA Weipa SoE Project Operations Marine and Shipping Management Plan September 2024 (dated 2/9/2024, approved by DCCEEW 2/9/24). Minor changes only.	Evidence specified in Condition 10.2 demonstrating implementation of plans DCCEEW letter dated 2/9/24	Review of documents relating to plan variation and implementation of actions relating to changes.	Compliance
Condition 73 EPBC 2010/5642 <i>If, at any time after the first five (5) year anniversary of the date of this approval, the approval holder has not commenced the action, then the approval holder must not commence the action without the written agreement of the Minister.</i>					
73.1	Commencement of the action must not occur after the first five (5) year anniversary of the date of this approval without the written agreement of the Minister.	EPBC 2016 audit report confirming the Commencement of the Action occurred within the five year anniversary of the EPBC2010/5642 dated 14/5/2013. Action has commenced within specified timeframe. 2022 audit confirmed.	EPBC 2016 audit report	EPBC 2016 audit report	Compliance No further auditing required.
Condition 74 EPBC 2010/5642 <i>The financial cost of adhering to the conditions specified in this approval will be borne by the approval holder.</i>					
74.1	The financial costs of adhering to the conditions specified in this approval must be borne by the approval holder.	Audit demonstrates that there is adherence to the conditions specified in the approval. Advised that the approval holder has incurred the costs.	Audit Checklist	Evidence throughout audit	Compliance
Condition 75 EPBC 2010/5642 <i>If the Minister believes that it is necessary or convenient for the better protection of World Heritage properties (sections 12 & 15A), National Heritage Place (section 158 & 15C), Listed threatened species and communities (sections 18 & 18A), Listed Migratory Species (section 20 & 20A), Commonwealth Marine</i>					

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
<i>Area (sections 23 & 24a) and Great Barrier Reef Marine Park (sections 248 and 24C) to do so, the Minister may request that the approval holder make specified revisions to the programs/s, plan/s or strategies specified in the conditions and submit the revised programs/s, plan/s or strategies for the Minister's written approval. The approval holder must comply with any such request. The revised approved programs/s, plan/s or strategies must be implemented. Unless the Minister has approved the programs/s, plan/s or strategies then the approval holder must continue to implement the programs/s, plants or strategies originally approved, as specified in the conditions.</i>					
75.1	If the Minister requests specified revisions for the better protection of World Heritage properties (sections 12 & 15A), National Heritage Place (section 158 & 15C), Listed threatened species and communities (sections 18 & 18A), Listed Migratory Species (section 20 & 20A), Commonwealth Marine Area (sections 23 & 24a) and Great Barrier Reef Marine Park (sections 248 and 24C), approved plan/s, program/s or strategies must be updated and submitted to the Minister for approval	No requests received from the Minister.	Interview Environment Superintendent	N/A	Not applicable
75.2	Updated plan/s, program/s or strategies must be implemented in relation to the relevant conditions for implementation of plan/s, program/s or strategies in this approval.	Not applicable - no requests received from the Minister.	N/A	N/A	Not applicable

Audit Criteria	Compliance Requirement / Audit Criteria	Auditor Evidence	Verification Method (Evidence)	Measurements Made (Sample)	Compliance Finding
75.3	Previously approved plan/s, program/s or strategies must continue to be used until the Minister has approved the updated plan/s, program/s or strategies.	Not applicable - no requests received from the Minister.	N/A	N/A	Not applicable
Condition 76 EPBC 2010/5642 <i>The approval holder must undertake the action in accordance with, and ensure persons that are under the direction or control of the approval holder for the South of Embley Bauxite Mine and Port Development project comply with, the approved plan/s, program/s or strategies to avoid, mitigate, manage and offset impacts to outstanding universal value of the World Heritage properties (sections 12 & 15A). National Heritage Place (section 15B & 15C), Listed threatened species and communities (sections 18 & 18A), Listed Migratory Species (section 20 & 20A), Commonwealth Marine Area (sections 23 & 24a) and Great Barrier Reef Marine Park (sections 24B and 24C).</i>					
76.1	Project activities and persons undertaking project activities must comply with the Temporary Barge Plan, Marine and Shipping Management Plan, Capital Dredging Management Plan/s, Maintenance Dredging Management Plan/s, Terrestrial Management Plan, Rehabilitation Strategy, Feral Pig Management Offset Strategy and Inshore Dolphin Offset Strategy.	Audit demonstrates that there is adherence to the conditions specified in the approval. All personnel interviewed understood the relevant requirements and were able to provide examples of implementation, as they applied to the scope of works conducted during the audit period.	Audit Checklist	Evidence throughout audit	Compliance

Appendix 2

Appointment of Independent Auditor and Approval of Audit Criteria

OFFICIAL



Australian Government
Department of Climate Change, Energy,
the Environment and Water

Our ref: EPBC 2010/5642

Mr Glenn Woodrow
Principal Advisor Approvals & Compliance
RTA Pty Ltd
155 Charlotte Street
Brisbane Qld 4000

Dear Glenn,

South of Embley Bauxite Mine and Port Development EPBC 2010/5642

I refer to your correspondence dated 15 January 2025, nominating an independent auditor from Ardent Group Pty Ltd and submitting the audit criteria for the South of Embley Bauxite Mine and Port Development (EPBC 2010/5642), approved under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) on 14 May 2013.

I approve the nominated auditor from Ardent Group Pty Ltd to conduct the independent audit required under condition 69 of the EPBC 2010/5642 approval and agree to the audit criteria prepared by them. I request that you submit the independent audit report to the Department of Climate Change, Energy, the Environment and Water by no later than 20 May 2025. I look forward to receiving a copy of the audit report.

If you have any questions regarding this matter, please contact Chris Kerin at audit@dcceew.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Helen Hodgkins'.

Helen Hodgkins
A/g Director Environmental Audit
Compliance and Enforcement Branch
5 February 2025

DCCEEW.gov.au
John Gorton Building, King Edward Terrace, Parkes ACT 2600 Australia

Appendix 3 Personnel Interviewed

Name	Role	Comments
Linda Wells	Environment Superintendent	Opening, Closing Meeting, Interview, Audit Liaison
Stuart Rech	Environment Advisor - Amrun	Opening, Closing Meeting, Interview, Audit Liaison
Lachy Johnson	Superintendent Land & Rehab	Opening, Closing Meeting, Interview
Marcus Payne	Land & Sea Specialist	Opening, Closing Meeting, Interview
Zara Hepple	Rehabilitation Advisor	Interview, Closing Meeting,
Raine Hitch	Land Management Advisor	Opening, Closing Meeting, Interview
Adam Bratt	Environment Monitoring Officer	Opening Meeting, Interview
Glenn Woodrow	Principal Advisor Approvals and Compliance	Opening, Closing Meeting, Interview
Lauren Barton	HSE Business Partner	Opening Meeting only
Sean Fagan	Senior Advisor Biodiversity	Interview, Closing Meeting

Appendix 4 Auditor's Declaration of Independence



Australian Government
Department of the Environment and Energy

Independent Audit and Audit Report Guidelines

For controlled actions which have been approved under Chapter 4 of the *Environment Protection and Biodiversity Conservation Act 1999*

2019

© Commonwealth of Australia, 2019.

Appendix A—Auditor's Declaration of Independence

I, Lana Shoesmith of Ardent Group Pty Ltd 3 Water Street, Red Hill, Queensland 4059

declare that to the best of my knowledge and belief I and my organisation do not have any conflicting or competing interests with:

The Auditee, RTA Weipa Pty Ltd – Amrun Project, the Auditee's staff or representatives or other persons associated with the Auditee, including any personal, financial, business or employment relationship, except to the extent detailed below.

The project to be audited EPBC 2010/5642 Amrun Project (formerly known as South of Embley Project).

I shall notify the Department of the Environment within seven days of any change in these circumstances or any other change that may affect my independent status.

I shall at all times observe any professional code of conduct and/or ethics applicable to undertaking audits (i.e. – as prescribed by the agency with which I hold accreditation/membership). I take full responsibility for any factual inaccuracy or mistake made in giving this declaration, particularly to the extent that others rely upon the truth of this declaration. I acknowledge that the Department of the Environment may request further information to verify my independence at any time.

Details of any personal, financial, business or employment relationship with the Auditee, the Auditee's staff, representatives or associated persons. (This is in the context of both the person making the declaration and the organisation that they are employed by – specify 'nil' if none):

- Conducted Independent EPBC 2010/5642 audit Amrun Project (2016, 2019, 2022)
- Conducted Annual Independent Coordinator General audits (2016, 2017, 2019 – desktop; and 2018)
- Conducted third party independent compliance audit EPML00562613 - ML7031 (2019, 2022)
- Conducted third party independent compliance audit EPML00725113 - ML6024 and ML7024 (2020, 2023)
- Conducted Third Party assurance review Weipa operations (2021)
- No other work has been conducted related to the Amrun Project or for Rio Tinto by myself or by Ardent Group.

Details of any personal, financial, business or employment relationship with the project to be audited. (This is in the context of both the person making the declaration and the organisation that they are employed by - specify 'nil' if none):

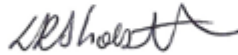
- Conducted Independent EPBC audit Amrun Project (2016, 2019, 2022)
- Conducted Annual Independent Coordinator General audits (2016, 2017, 2019 – desktop only; and 2018)
- Conducted third party independent compliance audit EPML00562613 - ML7031 (2019, 2022)
- Conducted third party independent compliance audit EPML00725113 ML6024 and ML7024 (2020, 2023)
- Conducted Third Party assurance review Weipa operations (2021)
- No other work has been conducted related to the Amrun Project by myself or by Ardent Group.

Details of audit qualifications and professional accreditations/memberships. (Include copies of current audit qualifications and current professional accreditations/memberships):

- Registered Master Environmental Auditor – Exemplar Global #12299
- Certified Environmental Practitioner – CEnvP #092
- Member Institute of Australia and New Zealand – EIANZ #55061
- Bachelor of Science (Honours) and Graduate Diploma Environmental Management

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both. An extract of section 491 of the EPBC Act is attached

Signed

A handwritten signature in black ink, appearing to read "LShoesmith", written over a horizontal line.

Full name (please print) Lana Shoesmith

Organisation (please print) Ardent Group

Date 6/11/2024

Footnote:

- Where an organisation or a team of auditors is nominated to undertake the audit, each individual that is nominated is to complete a separate declaration.
- The curriculum vitae of all audit team members are to be submitted with the declaration outlining their relevant experience and qualifications.

Appendix 5 Auditor's Certification

Audit Report-Auditor's Certification

Auditor Details: Lana Shoesmith, General Manager, Audits and Compliance, Ardent Group Pty Ltd,

3 Water Street Red Hill, Queensland 4059, phone: 07 3368 1033

Auditor's qualifications and/or experience:

- Exemplar Global Master Environmental Auditor #12299
- Certified Environmental Practitioner CEnvP #092
- Member Environmental Institute of Australia and New Zealand EIANZ #55081
- Bachelor of Science (Honours) and Graduate Diploma Environmental Management

Auditor's declaration:

I, Lana Shoesmith

- For environmental audits that are required by a condition of an *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both.

A handwritten signature in black ink, appearing to read 'LShoesmith', with a stylized flourish at the end.

Signature:

Date: 17/04/2025