



Corunna Downs Project Compliance Assessment Plan

Ministerial Statement 1125

179-LAH-EN-PLN-0001

Revision A

Authorisation

Rev	Reason for Issue	Prepared	Checked	Authorised	Date
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Signatures are required for Revision 0 and above

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1. Purpose

On 12 March 2020 Atlas Iron Pty Ltd (Atlas Iron) received Ministerial approval (MS 1125) to develop the Corunna Downs Project (the Project), an iron ore project located in the Pilbara region of Western Australia, approximately 33 km south of Marble Bar.

This Compliance Assessment Plan (CAP) has been developed to address Condition 4-1 and 4-2 of this approval:

4-1 The proponent shall prepare and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by Condition 4-6, or prior to implementation of the proposal, whichever is sooner.

4-2 The Compliance Assessment Plan shall indicate:

- the frequency of compliance reporting;*
- the approach and timing of compliance assessments;*
- the retention of compliance assessments;*
- the method of reporting of potential non-compliances and corrective actions taken;*
- the table of contents of Compliance Assessment Reports; and*
- public availability of Compliance Assessment Reports.*

This CAP has been prepared in accordance with the Office of the Environmental Protection Authority's (OEPA) Post Assessment Guideline for Preparing a Compliance Assessment Plan, PAG No 2 (OEPA, 2012a).

2. Frequency of Compliance Reporting

In accordance with Condition 4-6 the first Compliance Assessment Report (CAR) shall be submitted fifteen (15) months from the date of issue of Ministerial Statement No. 1125, being 12 June 2021 and will address the twelve (12) month period from the date of issue of this Statement (12 March 2020 to 11 March 2021).

Subsequent CARs shall be submitted annually on the 12 June of each year, or as otherwise agreed in writing by the CEO.

3. Approach and Timing of Compliance Assessments

Compliance with the conditions of Ministerial Statement 1125 shall be conducted in accordance with the approach and timing stipulated in the Audit Table template provided in Appendix A.

4. Retention of Compliance Assessments

In accordance with Condition 4-4 Atlas Iron shall retain all CARs (and supporting information) required by Condition 4-1, for a minimum of seven years following the end of the life of the proposal, in accordance with the PAG No 2 (OEPA, 2012). The end of the life of Proposal is defined as the point at which all implementation conditions have been met and all decommissioning and/or closure works have been completed.

5. Reporting Non-Compliances and Corrective Measures

In accordance with Condition 4-5 Atlas Iron shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known. Serious non-compliances shall be reported as soon as practicable, within 48 hours.

Information to be provided in potential non-compliance report shall include:

- Incident details (what, when, where).
- Assessment of the extent of any associated impacts, where applicable.
- Determination of the cause(s).
- Details of remedial and/or corrective action(s) taken or proposed to be taken, if any.
- Details of any existing preventative measures/controls that were in place and what, if any, amendments have been made to those measures to prevent re-occurrence.

6. Compliance Assessment Report Table of Contents

The CAR shall include the following components, in accordance with the OEPA's Post Assessment Guideline for Preparing a Compliance Assessment Report, PAG No 3 (OEPA, 2012b):

- **Introduction** – Brief details on the Project, including Statement number and the period of time covered by the CAR.
- **Implementation Status** – Brief summary of the Project's implementation status including any issues that have arisen and/or major Project milestones/ achievements.
- **Statement of Compliance** – Prepared in accordance with and including all the information required by the OEPA's Post Assessment Form for a Statement of Compliance (OEPA, 2018 or as may otherwise be current at the time of assessment).

- **Details of Declared Compliance Status** – Details of declared compliance status of each implementation condition of MS 1125, including compliance status of key characteristics of the Project as required by Condition 1-1 (as detailed in Schedule 1-Table 2). Note MS 1125 does not have any conditions requiring implementation of environmental management plans/programs. This Section will be supported by:
 - A **Completed Audit Table** prepared in accordance with OEPA’s Post Assessment Guideline for Preparing an Audit Table, PAG No 1 (OEPA, 2012c), template for which is provided as **Appendix A**.
 - Any information/documentation which supports/verifies statements of compliance (e.g., photos, monitoring data and analysis, consultant reports, registers, maps/aerial etc.).

7. Public Availability of Reports

In accordance with Condition 5-1 of MS 1125, Atlas Iron intend to publish all CARs on the company’s website, within 30 days of submission to the CEO, unless otherwise approved by the CEO in accordance with Condition 5-2.

8. Revision of Compliance Assessment Plans

Atlas Iron shall review and revise the CAP as required to reflect any changes made to the Project or Ministerial Statement where the change impacts on any actions or requirements of the CAP. Note MS 1125 does not have any conditions requiring implementation of environmental management plans/programs.

9. References

OEPA, 2012a. Post Assessment Guideline for Preparing a Compliance Assessment Plan. A WWW document accessed on 19 May 2020 from <https://www.epa.wa.gov.au/sites/default/files/PAG2%20-%20Guideline%20for%20Preparing%20a%20CAP.pdf>. Office of the Environmental Protection Authority. Perth, Western Australia.

OEPA, 2012b. Post Assessment Guideline for Preparing a Compliance Assessment Report. A WWW document accessed on 19 May 2020 from <https://www.epa.wa.gov.au/sites/default/files/Publications/PAG3%20-%20Preparing%20a%20CAR.pdf>. Office of the Environmental Protection Authority. Perth, Western Australia.

OEPA, 2012c. Post Assessment Guideline for Preparing an Audit Table. A WWW document accessed on 19 May 2020 from <https://www.epa.wa.gov.au/sites/default/files/PAG1%20-%20Guideline%20for%20Preparing%20an%20Audit%20Table.pdf>. Office of the Environmental Protection Authority. Perth, Western Australia.

OEPA, 2018. Post Assessment Form for a Statement of Compliance. A WWW document accessed on 19 May 2020 from <https://www.epa.wa.gov.au/post-assessment-forms>. Office of the Environmental Protection Authority. Perth, Western Australia.



Appendix A – Compliance Audit Table Template

Notes:

- Phases that apply in this table: Pre-Construction, Construction, Operation, Decommissioning, Overall (i.e., where an audit element applies during multiple phases).
- Acronyms list: CEO = Chief Executive Officer of DWER; DWER = Department of Water and Environmental Regulation; EPA = Environmental Protection Authority; Minister for Env = Minister for the Environment.
- Compliance Status: C = Compliant, CLD = Completed, NR = Not Required at this stage, PNC = Potentially Non-compliant, NC = Non – compliant, IP = In Process.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1125:M1.1.1	Proposal Implementation	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act. Authorised extent (a) in Schedule 1, Table 2 of MS1125 is: <i>Clearing no more than 423.11 ha of native vegetation within the 2,257.6 ha development envelope.</i>	Implementation of Ground Disturbance Permit Procedure (950-HSE-EN-PRO-0001).	Compliance assessment report	Overall	For the life of the Proposal		
1125:M1.1.2	Proposal Implementation	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act. Authorised extent (b) in Schedule 1, Table 2 of MS1125 is: <i>Abstracting no more than 1.1 GLpa from borefields.</i>	Implementation of Site Water Operating Plan, approved under Groundwater License GWL176960.	Compliance assessment report	Overall	For the life of the Proposal		
1125:M2.1	Contact Details	The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Written correspondence.	Letter to the CEO notifying of any change of the name and address of the proponent.	Overall	Within 28 days of such change		
1125:M3.1	Time Limit for Proposal Implementation	The proponent shall not commence implementation of the proposal after five (5) years from the date of this Statement, and any commencement, prior to this date, must be substantial.	Compliance Assessment Report	Photos demonstrating substantial commencement of Project	Construction	Prior to 12 March 2025		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1125:M3.2	Time Limit for Proposal Implementation	Any commencement of implementation of the proposal, on or before five (5) years from the date of this Statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of five (5) years from the date of this Statement.	Written correspondence - Compliance Assessment Report	Photos demonstrating substantial commencement of Project	Construction	Prior to 12 March 2025		
1125:M4.1	Compliance Reporting	The proponent shall prepare and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation of the proposal, whichever is sooner.	Prepare Compliance Assessment Plan (this document) in accordance with approval and guideline requirements.	Approved CAP. OEPA approval of CAP (this document).	Overall	12 December 2020 or prior to implementation of the Proposal whichever is sooner		
1125:M4.2	Compliance Reporting	The Compliance Assessment Plan shall indicate: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments; (4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.	Prepare Compliance Assessment Plan (this document) in accordance with approval and guideline requirements.	Approved CAP. OEPA approval of CAP (this document).	Overall	12 December 2020		
1125:M4.3	Compliance Reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2, the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.	Compliance Assessment Report prepared in accordance with approved Compliance Assessment Plan	Submission of CAR to the CEO	Overall	Annually – 12 June		
1125:M4.4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 4-1 and shall make those reports available when requested by the CEO.	All Compliance Assessments will be retained for a minimum of seven years following the end of the life of the proposal.	Can provide on request by the CEO.	Overall	When requested by the CEO		
1125:M4.5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.	Written correspondence.	Letter to the CEO.	Overall	Within 7 days of non-compliance being known		
1125:M4.6	Compliance Reporting	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement	Compliance Assessment Report	Submission of CAR to the CEO	Overall	Annually – 12 June		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO. The Compliance Assessment Report shall: (1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf; (2) include a statement as to whether the proponent has complied with the conditions; (3) identify all potential non-compliances and describe corrective and preventative actions taken; (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1.						
1125:M5.1	Public Availability of Data	Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal, the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	All reports and management plans relevant to the assessment of the Project are publically available on EPA website. All reports required by Condition 6-2 and 7-1 will be made publically available on Atlas Iron website in accordance with Condition 5-1 and 5-2.	Atlas website	Overall	Within one (1) m of Commonwealth Government acceptance/ approval of management plan or report, unless otherwise approved by CEO in accordance with Condition 5-2		
1125:M5.2	Public Availability of Data	If any data referred to in condition 5-1 contains particulars of: (1) a secret formula or process; or (2) confidential commercially sensitive information, the proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.	Written correspondence.	Letter to the CEO including reasons/explanation as to why the data should not be made publically available.	Overall	For the life of the Proposal		
1125:M6.1.1	Pilbara Leaf-Nosed Bat	The proponent must design and implement the proposal to meet the	Cave CO-CA-03 inclusive of 50 m buffer	Compliance assessment report	Overall	For the life of the Proposal		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		following environmental outcomes to minimise impacts on the Pilbara leaf-nosed bat: (1) maintain a 50-metre buffer around the lateral extent of cave CO-CA-03 as shown in Figure 3 of Schedule 1	has been excised from Development Envelope. Implementation of Ground Disturbance Permit Procedure (950-HSE-EN-PRO-0001).					
1125:M6.1.2	Pilbara Leaf-Nosed Bat	The proponent must design and implement the proposal to meet the following environmental outcomes to minimise impacts on the Pilbara leaf-nosed bat: (2) maintain a 340-metre buffer around the lateral extent of cave CO-CA-01 as shown in Figure 4 of Schedule 1.	Cave CO-CA-01 inclusive of 340 m buffer has been excised from Development Envelope. Implementation of Ground Disturbance Permit Procedure (950-HSE-EN-PRO-0001).	Compliance assessment report	Overall	For the life of the Proposal		
1125:M6.2	Pilbara Leaf-Nosed Bat	The proponent shall provide the CEO with copies of all reports and data relating to the Pilbara leaf-nosed bat required under conditions 1, 2, 3 and 4 of the Final Approved Decision Notice 2017/7861 Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i> within one (1) month of their provision to the Commonwealth Government.	Electronic submission (email)	Email correspondence /transmittal	Overall	Within one (1) month of their provision to the Commonwealth Government.		
1125:M7.1	Offsets	The proponent shall provide the CEO with copies of all reports, data and proof of money paid into a conservation offset fund, relating to the Pilbara leaf-nosed bat required under condition 5 of the Final Approved Decision Notice 2017/7861 under the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i> within one (1) month of their provision to or receipt from the Commonwealth Government.	Electronic submission (email)	Email correspondence /transmittal	Overall	Within one (1) month of their provision to or receipt from the Commonwealth Government.		