



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2

09/12/2024


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MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Authorisation

Version	Reason for Issue	Prepared	Checked	Authorised	Date
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MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2

Table of Contents

1	Introduction.....	1
2	Project Implementation Status	1
2.1	Project Milestones	1
2.2	Project Issues.....	1
3	Statement of Compliance.....	1
3.1	Proposal and Proponent Details	1
3.2	Statement of Compliance.....	1
3.3	Proponent Declaration	1
4	Details of Declared Compliance Status	2
4.1	Audit Criteria.....	2
4.2	Audit Process	2
4.3	Assessment of Compliance	2
4.4	Compliance Status	3
4.5	Compliance Audit Table.....	4
5	References	17

List of Tables

Table 1. Compliance Status Terminology	2
Table 2. MS 1197 DWER Audit Table	4

List of Appendices

Appendix A. Extent of native vegetation clearing	18
Appendix B. MS 1197 Mine Exclusion Zones Demarcation	20
Appendix C. Monthly Cave Inspection Template.....	22
Appendix D: 23 Extent of clearing in fauna habitat type(s): Ironstone Ridgetop, Rocky Ridge and Gorge, Stoney Rises, and Rocky Foothills.	23
Appendix E. 25	
Confirmation of Approval of Significant Species Management Plan, version 7.	25
Appendix F. Confirmation of Approval of Aboriginal Cultural Heritage Management Plan, version 3. 27	
Appendix G. Notification of Substantial Commencement of the Project.	30
Appendix H. Confirmation of Approval of Impact Reconciliation Procedure, version 2.	32
Appendix I. Confirmation of Approval of Compliance Assessment Plan, version 2.	34
Appendix J. Notification of Change of Proponent Address.....	36



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2

Abbreviations

Atlas	Atlas Iron Pty Ltd
ACHMP	Aboriginal Cultural Heritage Management Plan
CAP	Compliance Assessment Plan
CAR	Compliance Assessment Report
CEO	The Chief Executive Officer of the Department of the Public Service responsible for the administration of section 48 of the Environmental Protection Act 1986
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DWER	Department of Water and Environmental Regulation
EP Act	Environmental Protection Act 1986
EPA	Environmental Protection Authority
GDP	Ground Disturbance Permit
GLpa	Gigalitres per annum
ha	hectares
km	kilometres
MEZ	Mine Exclusion Zone



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2

1 Introduction

Atlas Iron Pty Ltd (Atlas) is operating and developing the Sanjiv Ridge Direct Shipping Ore (DSO) Project (the Project), an iron ore mine located in the Pilbara region of Western Australia, approximately 240 km southeast of Port Hedland and 33 km south of Marble Bar.

Stage 1 of the Project, approved under Ministerial Statement 1125 (MS 1125), involves mining five open pits (Sparrow Lake, Razorback, Shark Gully, Runway North and Runway South), using conventional drill and blast, load and haul methods to extract an iron ore resource of approximately 23.1 million tonnes (Mt) over a mine life of approximately six years. Ore is trucked to the run-of-mine (ROM) pad for crushing and screening with the final product hauled to Utah Point in Port Hedland for export overseas.

Stage 2 of the Project, approved under Ministerial Statement 1197 (MS 1197) is a satellite operation to Stage 1, which will involve the above water table mining of approximately 10 Mt of iron ore from the Glen Herring deposit which is located on an adjacent range 3 km west of Stage 1. Stage 2 will consist of three new pits, four waste rock dumps and a 4 km haul road connecting to Stage 1, where ore will be hauled for processing. No additional groundwater abstraction is required, as water for activities such as dust suppression will be supplied from Stage 1 using existing infrastructure.

As part of MS 1197, published on 13 September 2022, Atlas is required to submit a Compliance Assessment Report (CAR) (this document) to the Department of Water and Environmental Regulation (DWER) annually by 9 of December to satisfy condition 8-6. This CAR is for the reporting period 13 September 2023 to 12 September 2024.

2 Project Implementation Status

2.1 Project Milestones

Ground disturbance and vegetation clearing at Stage 2 commenced on 4 November 2023 with a total area of 24.24 ha cleared during the reporting period.

2.2 Project Issues

There were no Project issues that arose during the reporting period.

3 Statement of Compliance

3.1 Proposal and Proponent Details

Project Title	Sanjiv Ridge Direct Shipping Ore (DSO) Project
Statement Number	1197
Proponent Name	Atlas Iron Pty Ltd
Proponent's Australian Company Number	110396168



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2

3.2 Statement of Compliance

Reporting Period		13 September 2023 to 12 September 2024					
Implementation phase(s) during reporting period (tick relevant phase(s))							
Pre-construction	<input checked="" type="checkbox"/>	Construction	<input checked="" type="checkbox"/>	Operation	<input checked="" type="checkbox"/>	Decommissioning	<input type="checkbox"/>
Audit table for Statement addressed in this Statement of Compliance is provided at attachment:		Table 2					
The audit table has been prepared and maintained in accordance with the DWER <i>Post Assessment Guideline for Preparing an Audit Table</i> , as amended from time to time. The "Status" column of the audit table accurately describes the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance.							
Were all implementation conditions and/or procedures of the Statement compiled within the reporting period (tick the appropriate box)							
No (please proceed to Section 3)				Yes (please proceed to Section 4)		<input checked="" type="checkbox"/>	

3.3 Proponent Declaration

I, Theodore Sprenkels (Superintendent Environment) declare that I am authorised on behalf of Atlas Iron Pty Ltd (being the person responsible for the proposal) to submit this form and that the information contained in this form is true and not misleading.

Signature: 

Date: 9/12/2024

Please Note that:

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



4 Details of Declared Compliance Status

4.1 Audit Criteria

The audit was carried out using the DWER-approved audit table for MS 1197, comprising Ministerial conditions M1-M9 (Section 4.5; Table 2).

4.2 Audit Process

The audit was conducted by Claudia Lewis, Environmental Advisor at Sanjiv Ridge and reviewed by Theodore Sprengels, Environmental Superintendent. The audit was performed at the Project site during November 2024 and involved reviewing documents and records.

No personnel were interviewed during the auditing process.

4.3 Assessment of Compliance

The assessment of compliance was reported against the audit elements of the DWER Audit Table (Table 2), including compliance status of key characteristics of the Project as required by Condition 1-1 (as detailed in Schedule 1- Table 2).

The 'status' field of the audit table describes the implementation of actions and compliance with MS 1197.

The terminology used to describe the status of implementation (Table 1) is consistent with that used by the OEPA (2012).

Table 1. Compliance Status Terminology

Status	Abbreviation Code	Description
Compliance	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.
Potentially non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2

4.4 Compliance Status

There were no Non-Compliances, Potential Non-compliances or In-Process audit elements found during the Audit.

The detailed assessment of compliance with the conditions of MS 1197 is presented in Table 2.

MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2

4.5 Compliance Audit Table

Notes:

- Phases that apply in this table: Pre-Construction, Construction, Operation, Decommissioning, Overall (i.e., where an audit element applies during multiple phases).

Table 2. MS 1197 DWER Audit Table

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information																											
1197:M1	Limitations and Extent of proposal	When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents:	Implement Ground Disturbance Permit Procedure (950-EN-PRO-0006) and Clearing and Grubbing Procedure (950-EN-PRO-0002).	Compliance Assessment Report (CAR).	Overall	Life of Project	C	<p>Compliant.</p> <p><i>Physical elements:</i></p> <ul style="list-style-type: none">A total of 24.24 ha of native vegetation was cleared during the reporting period within the 125 ha indicative footprint.No clearing has occurred outside of the authorised extent of the proposal as defined in Appendix A. <p><i>Operational elements:</i></p> <ul style="list-style-type: none">No mining occurred during the reporting period. <p><i>Timing elements:</i></p> <ul style="list-style-type: none">Substantial development of the Project commenced on 4 November 2023. The Project commenced during this reporting period. <p>Evidence:</p> <p>Appendix A: Extent of Native Vegetation Clearing</p> <p>Attachment A: Sanjiv Ridge Stage 2 - Native Vegetation Clearing Spatial Data</p> <p>Appendix B: MS 1197 Mine Exclusion Zones Demarcation (GIS_3716)</p>																											
		<table><tr><th>Proposal Element</th><th>Location</th><th>Maximum extent or range</th></tr><tr><td colspan="3"><i>Physical Elements</i></td></tr><tr><td>Development envelope</td><td>Figures 1 and 2</td><td>No more than 246 ha</td></tr><tr><td>Indicative footprint</td><td>Figure 2</td><td>No more than 125 ha within a 246 ha development envelope</td></tr><tr><td>Mine Exclusion Zone (MEZ)</td><td>Figure 3</td><td>Exclusion of mining activities, pits, excavation, waste dumps and permanent structures.</td></tr><tr><td colspan="3"><i>Operational elements</i></td></tr><tr><td>Mining</td><td>Figure 2</td><td>Up to 3 Mtpa.</td></tr><tr><td colspan="3"><i>Timing elements</i></td></tr><tr><td>Project life</td><td>N/A</td><td>Up to 4.5 years from date of substantial commencement.</td></tr></table>							Proposal Element	Location	Maximum extent or range	<i>Physical Elements</i>			Development envelope	Figures 1 and 2	No more than 246 ha	Indicative footprint	Figure 2	No more than 125 ha within a 246 ha development envelope	Mine Exclusion Zone (MEZ)	Figure 3	Exclusion of mining activities, pits, excavation, waste dumps and permanent structures.	<i>Operational elements</i>			Mining	Figure 2	Up to 3 Mtpa.	<i>Timing elements</i>			Project life	N/A	Up to 4.5 years from date of substantial commencement.
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Project life	N/A	Up to 4.5 years from date of substantial commencement.																																	





Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1197:M2-1	Terrestrial Fauna	<p>The proponent shall implement the proposal to meet the following environmental outcomes:</p> <p>(1) clearing in the fauna habitat type identified as Ironstone Ridgetop shall not exceed 89.1 ha;</p> <p>(2) clearing in the fauna habitat type Rocky Ridge and Gorge shall not exceed 25 ha;</p> <p>(3) clearing in the fauna habitat type Stony Rises shall not exceed 5.8 ha;</p> <p>(4) clearing in the fauna habitat type Rocky Foothills shall not exceed 4.6 ha;</p> <p>(5) no adverse impact to the structural integrity, microclimate or viability of the ten (10) bat caves shown in Figure 4; and</p> <p>(6) no direct disturbance of bat cave avoidance buffers around ten (10) caves in the development envelope as depicted in Figure 4 and coordinates in Schedule 1.</p>	<p>Implement:</p> <ul style="list-style-type: none"> Ground Disturbance Permit Procedure (950-EN-PRO-0006) Clearing and Grubbing Procedure (950-EN-PRO-0002) Significant Sites Buffer Design Guideline (950-EN-GUI-0002) Significant Sites Demarcation Procedure (950-EN-PRO-0018) Significant Sites Demarcation Standard (950-EN-STA-0002) Blast Management Plan Bat Roost Monitoring Procedure (950-EN-PRO-0019) Northern Quoll Monitoring Procedure (179-EN-PRO-0001 v4) Ghost Bat Monitoring Procedure (179-EN-PRO-0003 v5) 	CAR, GDP records, Site buffer records, related GIS and inspections.	Overall	Life of Project	C	<p>Compliant.</p> <p>(1) A total of 15.23 ha of Ironstone Ridgetop was cleared during the reporting period. A total of 15.23 ha has been cleared since the commencement of the Project.</p> <p>(2) A total of 1.67 ha of Rocky Ridge and Gorge was cleared during the reporting period. A total of 1.67 ha has been cleared since the commencement of the Project.</p> <p>(3) A total of 5.34 ha of Stoney Rises was cleared during the reporting period. A total of 5.34 ha has been cleared since the commencement of the Project. Trigger Criteria was met for this habitat type where the approved fauna habitat clearing reached a 90% limit (5.2 ha) of the 5.8 ha allocation. The trigger criteria actions outlined in the approved Significant Species Management Plan (SSMP) were met through the following:</p> <ul style="list-style-type: none"> Regular survey of the area to capture and assess to date clearing against approval limits. GDP amendments to allow for extra GDP conditions that reduce the likelihood of meeting the threshold criteria. Notification to the Site Senior Executive and relevant stakeholders in regard to the current clearing status and the clearing limit of 5.8 ha. <p>(4) A total of 2.00 ha of Rocky Foothills was cleared during the reporting period. A total of 2.00 ha has been cleared since the commencement of the Project.</p> <p>(5) No adverse impact to the structural integrity, microclimate or viability of the ten (10) bat caves.</p> <p>(6) No direct disturbance of bat avoidance buffers around ten (10) caves in the development envelope as depicted in Figure 4 and in Schedule 1. Demarcation around the ten (10) caves in the development envelope has been undertaken in accordance with the Atlas Significant Site Demarcation Standard and Demarcation Procedure, to protect the caves from inadvertent disturbance from people, vehicles and machinery. The buffers have not been breached by unauthorised people, vehicles or machinery.</p> <p>Evidence: Attachment A: Sanjiv Ridge Stage 2 - Native Vegetation Clearing Spatial Data Appendix B: MS 1197 Mine Exclusion Zones Demarcation (GIS_3716) Appendix C: Monthly cave inspection template Appendix D: Extent Of Clearing in Fauna Habitat Type(S): Ironstone Ridgetop, Rocky Ridge and Gorge, Stony Rises and Rocky Foothills</p>

MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1197:M2-2	Terrestrial Fauna	The proponent shall implement the proposal to meet the following environmental objective: (1) avoid, where possible, and otherwise minimise indirect impacts to listed conservation significant fauna species within the development envelope.	Implement: <ul style="list-style-type: none"> Ground Disturbance Permit Procedure (950-EN-PRO-0006) Clearing and Grubbing Procedure (950-EN-PRO-0002) Fauna Management Procedure (950-EN-PRO-0004) Significant Species Management Plan Native Wildlife Procedure (950-EN-PRO-0011) 	CAR	Overall	Life of Project	C	Compliant. Implementation of the Significant Species Management Plan – Stage 2 (179-EN-PLN 0002 v7). Table 2.2 – Objective-based provisions. The annual SSMP audit is available upon request.
1197:M2-3	Terrestrial Fauna	The proponent shall implement the latest version of the Significant Species Management Plan which shall: (1) demonstrate how the environmental outcomes in condition 2-1 and the objective of condition 2-2 are achieved; (2) include bat cave avoidance buffers around ten (10) caves in the development envelope as depicted in Figure 4 and coordinates in Schedule 1; (3) include the latest version of the northern quoll monitoring procedure; (4) include the latest version of the ghost bat monitoring procedure; (5) design blasts to perform to the blast criteria at threshold 100 mm/s at caves CO-CA-22, CO-CA-24 and CO-CA-27 for the protection of the structural integrity of bat roosts; (6) specify trigger criteria that will trigger the implementation of management and/or contingency actions to prevent direct or indirect impacts to conservation significant fauna species; (7) specify threshold criteria to demonstrate compliance with conditions 2-1 and 2-2; (8) specify monitoring methodology to determine if trigger criteria and threshold criteria have been met; (9) specify management and/or contingency actions which include changes to operations to be implemented if the trigger criteria required by condition 2-3(6) and/or the threshold criteria 2-3(7) have not been met; and (10) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that conditions 2-1 and 2-2 have been met over the reporting period in the Compliance Assessment Report required by condition 8-6.	Implement: <ul style="list-style-type: none"> Northern Quoll Monitoring Procedure Ghost Bat Monitoring Procedure Blast Management Plan GDP Procedure Clearing and Grubbing Procedure Bat Roost Monitoring Procedure (950-EN-PRO-0019) 	CAR, Northern Quoll, Ghost Bat and SSMP results and reporting.	Overall	Life of Project	C	Complaint. Atlas continues to implement the latest version of the Significant Species Management Plan – Stage 2 (179-EN-PLN 0002 v7) for the Project, approved by DWER on 23 August 2023. The 2023 Northern Quoll Monitoring Report was provided to Atlas in May 2024: Northern quolls were detected at all five Impact sites during the 2023 survey. During the 2022 survey, northern quolls were detected at four of the five Impact sites (80% of sites). As northern quolls were detected at the majority (greater than 50%) of Impact sites over the previous two annual consecutive monitoring periods. Northern quoll numbers weren't lower than 50% of baseline levels at all impact sites; the key performance indicators and associated trigger/threshold criteria were not triggered. The 2023 Ghost Bat Monitoring Report was provided to Atlas in May 2024: Based on either short-term monitoring for seven consecutive nights, or continuous monitoring at select sites across 2023, ghost bat activity was recorded at all Impact sites except CO-CA-20. Results of the previous monitoring surveys show that CO-CA-20 is likely only occasionally used by ghost bat. There have been no signs of rockfall or structural damage within any of the Stage 2 sites. Overall, there are no signs that ghost bat activity in the Sanjiv Ridge Study Area, or the suitability of roosts as habitat for ghost bat, have been affected by mining activity. Based on these results, the key performance indicators and associated trigger/threshold criteria were not triggered. Evidence: Appendix B: MS 1197 Mine Exclusion Zones demarcation (GIS_3716). Attachment B: 2023 Northern Quoll Monitoring Report Attachment C: 2023 Ghost Bat Monitoring Report Significant Species Management Plan (179-EN-PLN-0002 v7) approved by DWER on 23 August 2023.

MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1197:M2-4	Terrestrial Fauna	The proponent must not commence ground disturbing activities until the CEO has confirmed in writing that the Significant Species Management Plan (SSMP) satisfies the requirements of condition 2-3.	Obtain CEO written confirmation of acceptance of SSMP.	Written letter from CEO.	Pre-construction	Must not commence ground disturbance until the CEO has confirmed in writing that the Significant Species Management Plan satisfies the requirements of condition 2-3.	CLD	<p>Completed.</p> <p>The Significant Species Management Plan (179-EN-PLN-0002 v7) was approved by the DWER on 24 August 2023, prior to commencement of the Project on 4 November 2024.</p> <p>Evidence:</p> <p>Appendix E: Confirmation of Approval of Significant Species Management Plan, version 7 (DWERT11253).</p>
1197:M2-5	Terrestrial Fauna	The proponent shall implement the most recent version of the confirmed Significant Species Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcomes in condition 2-1 and objective detailed in condition 2-2 have been met.	Implement SSMP.	Written letter from CEO.	Overall	Life of Project	C	<p>Compliant.</p> <p>Atlas continues to implement the most recent version of the confirmed Significant Species Management Plan (179-EN-PLN 0002 v7). See condition 2-3 for further information.</p>
1197:M2-6	Terrestrial Fauna	<p>In the event that the environmental outcomes in condition 2-1 are exceeded, or monitoring or investigations at any time indicate an exceedance of threshold criteria specified in the confirmed Significant Species Management Plan, the proponent shall:</p> <p>(1) report the exceedance in writing to the CEO and DCCEE within seven (7) days of the exceedance being identified;</p> <p>(2) implement the management or contingency actions required by condition 2-3(9) within seven (7) days of the exceedances being reported as required by condition 2-6(1) and continue implementation of those actions until the CEO and DCCEE have confirmed by notice in writing that it has been demonstrated that the threshold criteria are being met and implementation of the management and/or contingency actions are no longer required;</p> <p>(3) investigate to determine the cause of the threshold criteria being exceeded;</p> <p>(4) investigate to provide information for the CEO and DCCEE to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded;</p> <p>(5) provide a further report to the CEO and DCCEE within twenty-one (21) days of the exceedance being reported as required by condition 2-6(1) which shall include:</p> <p>(a) details of management and/or contingency actions implemented;</p> <p>(b) the effectiveness of the management and/or contingency actions implemented against the threshold criteria;</p> <p>(c) the findings of the investigations required by conditions 2-6(3) and 2-6(4);</p> <p>(d) measures to prevent the threshold criteria being exceeded in the future;</p> <p>(e) measures to prevent, control or abate the environmental harm which may have occurred; and</p> <p>(f) justification of the threshold criteria remaining, or being adjusted based on better understanding, demonstrating that outcomes will continue to be met.</p>	Send Incident Report of exceedance to CEO and DCCEE, implement management measures, investigate, provide details of incident, findings etc, as outlined in 2-6(5).	Report/Letter/Email to CEO and DCCEE.	Overall	In the event that the environmental outcomes in condition 2-1 are exceeded.	C	<p>Compliant.</p> <p>There were no exceedances of threshold criteria specified in the approved Significant Species Management Plan (179-EN-PLN 0002 v7) during the reporting period, and therefore did not trigger the reporting requirements of M2-6.</p>

MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1197:M2-7	Terrestrial Fauna	Without limiting condition 2-5 (implementation of the plan) and notwithstanding compliance with condition 2-6 (response to exceedance), the proponent must not cause or allow: (1) a failure to implement one or more management and/or contingency actions, if the relevant threshold criteria have been exceeded; (2) the exceedance of a threshold criteria (regardless of whether the relevant management and/or contingency actions have been or are being implemented); and/or (3) a failure to comply with the requirements of the confirmed Significant Species Management Plan.	Implement management actions, prevent exceedances and comply with the SSMP.	CAR.	Overall	Life of Project.	C	Compliant. There were no exceedances of threshold criteria specified in the Significant Species Management Plan (179-EN-PLN 0002 v7). Therefore, Atlas did not cause or allow: (1) a failure to implement one or more management and/or contingency during the reporting period. (2) the exceedance of a threshold criteria (regardless of whether the relevant management and/or contingency actions have been or are being implemented); and/or (3) a failure to comply with the requirements of the confirmed Significant Species Management Plan.
1197:M2-8	Terrestrial Fauna	The proponent: (1) may review and revise the confirmed Significant Species Management Plan and submit it to the CEO; and (2) shall review and revise the confirmed Significant Species Management Plan and submit it to the CEO as and when directed by the CEO.	Revise and review SSMP.	Letter and revised SSMP sent to CEO.	Overall	Life of Project.	C	Compliant. (1) Atlas did not submit to the CEO a revised Significant Species Management Plan during the reporting period. (2) Atlas was not directed to review and revise the confirmed Significant Species Management Plan and submit it to the CEO during the reporting period.
1197:M3-1	Inland Waters	The proponent shall implement the proposal to meet the following outcome: (1) avoid direct disturbance of the 50 m avoidance buffer around pools CO-WS-04, CO-WS-16, CO-WS-17 and CO-WS-18 as depicted in Figure 3 and coordinates in Schedule 1.	Implement: <ul style="list-style-type: none"> Ground Disturbance Permit Procedure (950-EN-PRO-0006) Clearing and Grubbing Procedure (950-EN-PRO-0002) Significant Sites Buffer Design Guideline (950-EN-GUI-0002) Significant Sites Demarcation Procedure (950-EN-PRO-0018) Significant Sites Demarcation Standard (950-EN-STA-0002) 	CAR, GDP records, Site buffer records and related GIS.	Overall	Life of Project.	C	Compliant. Avoidance buffers around pools CO-WS-04 and CO-WS-16, CO-WS-17 and CO-WS-18 were demarcated in accordance with the Significant Sites Demarcation Procedure (950-EN-PRO-0018). Pools CO-WS-04 and CO-WS-16 form part of the broader Mine Exclusion Zone as listed in Figure 3 of MS 1197. Evidence: Appendix B: MS 1197 Mine Exclusion Zones Demarcation (GIS_3716).
1197:M4-1	Cultural Heritage	The proponent shall implement the proposal to meet the following outcomes: (1) avoid direct disturbance of Aboriginal heritage avoidance buffers and their sites CRD-03-13B and CRD-71-20, located in the exclusion zones as shown in Figure 3 and coordinates in Schedule 1; and (2) subject to reasonable health and safety requirements, allow ongoing access to land utilised for Traditional Owner and custodian access within and surrounding the development envelope during operations.	Implement: <ul style="list-style-type: none"> Ground Disturbance Permit Procedure (950-EN-PRO-0006) Significant Sites Demarcation Procedure (950-EN-PRO-0018) Significant Sites Demarcation Standard (950-EN-STA-0002) Aboriginal Cultural Heritage Management Plan (AHCMP), including cultural land access protocol. 	CAR, heritage site inspection records. Incident reporting system records, relating to: <ul style="list-style-type: none"> Record of ground disturbance within sites and/or their buffers. TO complaint regarding refused access (without reasonable health and safety concern). 	Overall	Life of Project.	C	Compliant. (1) Avoidance buffers around heritage sites CRD-03-13B and CRD-71-20 were demarcated in 2023 as part of the broader Mine Exclusion Zone as listed in Figure 3 of MS 1197. There was no direct disturbance to sites CRD-03-13B and CRD-71-20, and their buffers during the reporting period. (2) Cultural land access protocols for Traditional Owners and Custodians is outlined in Appendix F of the ACHMP and allows for ongoing access for the Nyamal people. During the reporting period no requests from the Nyamal People to access within or surrounding the development envelope were received. Evidence: Appendix B: MS 1197 Mine Exclusion Zones Demarcation (GIS_3716).



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1197:M4-2	Cultural Heritage	<p>The proponent shall implement the proposal to meet the following objectives:</p> <p>(1) avoid, where possible, and otherwise minimise indirect impacts to Aboriginal heritage sites CRD-03-13B and CRD-71-20, within and surrounding the disturbance footprint; and</p> <p>(2) avoid, where possible, and otherwise minimise direct and indirect impacts to social and cultural places and activities of significance.</p>	Implement ACHMP, including; blast management and monitoring plan, inadvertent discovery protocol and pool monitoring program.	<p>CAR.</p> <p>Incident reporting system records, relating to:</p> <ul style="list-style-type: none">Any incident of rockfall at CRD-03-13BAny TO complaint regarding excessive dust within rockshelter CRD-03-13BAny GDP Breach – where clearing took place without a GDP in an area that had not been appropriately heritage surveyed. <p>TO consultation records</p> <p>Pool monitoring records</p> <p>Survey/commissioning records (reports can only be made available under the discretion from the Traditional Owners).</p>	Overall	Life of Project.	C	<p>Compliant.</p> <p>(1) No indirect impacts to Aboriginal Heritage Sites CRD-03-13B and CRD-71-20 were identified during the reporting period.</p> <p>(2) No indirect or direct impacts to social and cultural places and activities of significance were identified during the reporting period.</p> <p>Atlas provides bi-monthly pool monitoring reports to Nyamal Aboriginal Corporation.</p>



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1197:M4-3	Cultural Heritage	<p>Prior to the ground disturbing activities, or such lesser time approved in writing by the CEO, the proponent shall, in collaboration with the Nyamal Aboriginal Corporation, prepare and submit to the CEO a Cultural Heritage Management Plan, to meet the outcomes specified in condition 4-1 and objectives specified in condition 4-2 and this plan shall:</p> <p>(1) specify the objectives to be achieved, as specified in condition 4-2;</p> <p>(2) include a framework for consultation with traditional owners and custodians via the Nyamal Aboriginal Corporation and other relevant stakeholders during the life of the proposal;</p> <p>(3) include information on ongoing monitoring of permanent water sources including the creeklines that flow between the development envelope and Coongan river;</p> <p>(4) specify operational environmental management activities relevant to cultural heritage;</p> <p>(5) include information on the outcomes of a heritage survey over a 200 m wide area surrounding the development envelope;</p> <p>(6) specify management actions that will be implemented to demonstrate compliance with the objectives specified in condition 4-2;</p> <p>(7) specify target(s) to determine the effectiveness of the management actions;</p> <p>(8) specify monitoring to measure the effectiveness of management actions against management targets;</p> <p>(9) in the event that the outcomes, objectives, and management targets are not achieved, specify a process of review and revision of management actions and changes to activities. Such process must include an investigation to determine the cause of the outcome, objective or management target(s) not being met;</p> <p>(10) report on compliance with the outcomes specified in condition 4-1 and objectives specified in condition 4-2; and</p> <p>(11) provide the format and timing to demonstrate that conditions 4-1, 4-2, and 4-3 have been met for the reporting period in the Compliance Assessment Report required by condition 8-6 including, but not limited to:</p> <p>(a) verification of the implementation of management actions; and</p> <p>(b) reporting on the effectiveness of management actions against the outcomes and objectives.</p>	ACHMP prepared and submitted to CEO for approval.	Letter to CEO with ACHMP.	Pre-Construction	Prior to ground-disturbing activities.	C	<p>Compliant.</p> <p>An Aboriginal Cultural Heritage Management Plan developed in collaboration with the Nyamal Aboriginal Corporation was approved by DWER on 4 October 2023.</p> <ol style="list-style-type: none"> Objectives are specified in Section 1.1 of the ACHMP Framework for consultation is included in Section 2.2 of the ACHMP Monitoring of permanent water sources is addressed in Section 4, Table 4-2 of the ACHMP Operational environmental management activities relevant to cultural heritage are included in Section 4, Table 4-2 of the ACHMP Information on the heritage survey over a 200m wide area surrounding the development envelop is included in Section 2 and Appendix C of the ACHMP Management actions to demonstrate compliance with objectives are specified in Section 4, Table 4-2 of the ACHMP Target(s) to determine the effectiveness of management actions are specified in Section 4, Table 4-2 of the ACHMP Monitoring to measure the effectiveness of management actions against management targets is outlined in Section 4, Table 4-2 of the ACHMP Process to review and revise management actions and changes to activities in the event that outcomes, objectives, and management targets are not achieved is outlined in Section 6.2.1 of the ACHMP Reporting on compliance with outcomes and objectives is addressed in Section 6.2.3 of the ACHMP Format and timing of reporting outlined in Section 6.2.3 and Appendix G of the ACHMP <p>Evidence: Appendix G: Confirmation of Approval of Aboriginal Cultural Heritage Management Plan, version 3.</p>
1197:M4-4	Cultural Heritage	<p>The proponent must not commence ground disturbing activities until the CEO confirmed in writing that the plan submitted under condition 4-3 satisfies the requirements of condition 4-3.</p>	No ground-disturbing activities until CEO approval granted.	Letter from CEO	Pre-Construction	Prior to Ground Disturbing activities.	CLD	<p>Completed.</p> <p>The Aboriginal Cultural Heritage Management Plan was approved by DWER on 4 October 2023.</p> <p>Evidence: Appendix G: Confirmation of approval of Aboriginal Cultural Heritage Management Plan, version 3. Appendix H: Notification of Substantial Commencement of the Project.</p>

MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1197:M4-5	Cultural Heritage	The proponent must implement the most recent version of the confirmed Cultural Heritage Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated the outcomes specified in condition 4-1 and objectives specified in condition 4-2 have been met or are able to be met under another statutory decision-making process.	Continue to implement the authorised/approved ACHMP.	CAR or Letter from CEO confirming outcomes and objectives have been met.	Overall	Life of Project or until CEO confirms outcomes and objectives have been met.	C	Compliant. Atlas continues to implement the most recent version of the confirmed Aboriginal Cultural Heritage Management Plan (179-HE-PLN-0001 v3) for the Project.
1197:M4-6	Cultural Heritage	In the event that monitoring, tests, surveys or investigations indicate non-achievement of outcomes specified in condition 4-1 or the objectives specified in condition 4-2, the proponent must: (1) report the non-achievement in writing to the CEO , and the Nyamal Aboriginal Corporation, within twenty-one (21) days of the non-achievement being identified; (2) investigate to determine the cause of outcome or management target(s) not being achieved; (3) provide a further report to the CEO , Nyamal Aboriginal Corporation, within ninety (90) days of the non-achievement being reported as required by condition 4-7(1) which must include: (a) a description of the cause of outcome or management target(s) being exceeded if known, or analysis of likely causes if not known; (b) the findings of the investigation required by condition 4-6(2); (c) details of revised and/or additional management actions to be implemented to prevent non-achievement; and (d) relevant changes to activities.	Implement ACHMP - including Management Target Non-Achievement Reporting	Non-achievement report	Overall	Life of Project - In the event that monitoring, tests, surveys or investigation s indicate non-achievement t of outcomes/o bjectives	C	Compliant. There was no non-achievement of outcomes specified in condition 4-1 or the objectives specified in condition 4-2 during the reporting period, and therefore did not trigger the response for (1), (2), and (3).
1197:M4-7	Cultural Heritage	In the event that monitoring, tests, surveys or investigations indicate that one or more management action(s) specified in the confirmed Cultural Heritage Management Plan have not been implemented, the proponent must: (1) report the failure to implement the management action(s) in writing to the CEO , Nyamal Aboriginal Corporation, within seven (7) days of identification; (2) investigate to determine the cause of the management action(s) not being implemented; (3) investigate to determine potential environmental harm or alteration of the environment that occurred due to the failure to implement management action(s); (4) provide a further report to the CEO , Nyamal Aboriginal Corporation, within twenty-eight (28) days of the non-compliance being identified, which must include: (a) cause for failure to implement management action(s); (b) the findings of the investigation required by condition 4-7(2); (c) relevant changes to activities; and (d) measures to prevent, control or abate the environmental harm which may have occurred.	Implement ACHMP - including Failure to Implement Reporting	Failure to implement report	Overall	Life of Project - In the event that monitoring, tests, surveys or investigation s indicate that one or more managemen t action(s) have not been implemente d.	C	Compliant. There was no failure to implement the management actions within the confirmed Aboriginal Cultural Heritage Management Plan and therefore did not trigger response for (1), (2), (3), and (4).
1197:M4-8	Cultural Heritage	Without limiting condition 4-5 (implementation of the plan) and notwithstanding compliance with condition 4-6 (response to exceedance), the proponent must not cause or allow: (1) a failure to implement one or more management actions specified in the confirmed Cultural Heritage Management Plan, and/or (2) failure to comply with the requirements of the confirmed Cultural Heritage Management Plan.	Implement ACHMP.	CAR, Failure to implement report	Overall	Life of Project	C	Compliant. There have been no instances of failure to implement or comply with the management actions or requirements of the Aboriginal Cultural Heritage Management Plan.

MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1197:M4-9	Cultural Heritage	The proponent, in consultation with the Nyamal Aboriginal Corporation: (1) may review and revise the confirmed Cultural Heritage Management Plan and submit it to the CEO ; and (2) shall review and revise the confirmed Cultural Heritage Management Plan as and when directed by the CEO .	Implement ACHMP, including ACHMP annual review or as requested by CEO, in consultation with NAC.	ACHMP document control and consultation records	Overall	Life of Project	C	Compliant. In conjunction with the Nyamal Aboriginal Corporation, the Aboriginal Cultural heritage Management Plan is undergoing revision to ensure it meets the requirements of the amended <i>Aboriginal Heritage Act 1972</i> . The revised ACHMP is expected to be endorsed by the NAC in early 2025 and will be submitted to the CEO for review and approval.
1197:M5-1	Offsets	The proponent shall contribute funds to the Pilbara Environmental Offsets Fund calculated pursuant to condition 5-2, to counterbalance the significant residual impacts to: (1) 'Excellent' condition native vegetation; and (2) critical habitat for the northern quoll, ghost bat, Pilbara leaf-nosed bat, and Pilbara olive python.	Pay Offsets in line with Impact Reconciliation Procedure.	Receipt of Payment and GDP GIS records.	Overall	Payment will be made no later than thirty (30) days after receiving invoice from DWER.	C	Compliant Once the Impact Reconciliation Report is submitted in August 2025 and the invoice is received, a payment will be made to the offset fund in accordance with the approved Impact Reconciliation Procedure.
1197:M5-2	Offsets	The proponent's provisional contribution to the Pilbara Environmental Offsets Fund shall be paid after the conclusion of the biennial reporting period specified in conditions 5-5, with the provisional amount to be contributed, calculated based on the clearing undertaken during the biennial reporting period in accordance with the highest applicable rate specified in condition 5-3 for the relevant type of vegetation.	Pay Offsets in line with Impact Reconciliation Procedure.	Receipt of Payment and GDP GIS records.	Overall	Shall be paid after the conclusion of the biennial reporting period specified in conditions 5-5.	C	Compliant. See condition 5-1.
1197:M5-3	Offsets	Calculated on the 2020–2021 financial year, the contribution rates are: (1) \$794 AUD (excluding GST) per hectare of 'Good to Excellent' condition native vegetation within the Chichester IBRA subregion; and (2) \$1,587 AUD (excluding GST) per hectare of critical habitat, northern quoll, ghost bat, Pilbara leaf-nosed bat and Pilbara olive python within the Chichester IBRA subregion.	Pay Offsets in line with Impact Reconciliation Procedure.	Receipt of Payment and GDP GIS records.	Overall	Shall be paid after the conclusion of the biennial reporting period specified in conditions 5-5.	C	Compliant. See condition 5-1.
1197:M5-4	Offsets	The rates in condition 5-3 change annually each subsequent financial year in accordance with the percentage change in the CPI applicable to that financial year.	Check for any changes to rates before payment. Pay Offsets in line with Impact Reconciliation Procedure.	Receipt of Payment and GDP GIS records.	Overall	Check rate changes every year prior to calculation and payment.	C	Compliant. See condition 5-1.

MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1197:M5-5	Offsets	The proponent must prepare and submit a Sanjiv Ridge Stage 2 Project Impact Reconciliation Procedure to the CEO prior to ground disturbing activities which must: (1) spatially define the environmental value(s) identified in condition 5-1; (2) spatially define the areas in respect of which offsets required by condition 5-1 are to be calculated; (3) include a methodology to calculate the amount of clearing undertaken during each year of the biennial reporting period for each of the environmental values identified in condition 5-3; (4) state that clearing calculation for the first biennial reporting period will commence from ground disturbing activities in accordance with condition 5-2 and end on the second 30 June following the commencement of ground disturbing activities ; (5) state that clearing calculations for each subsequent biennial reporting period will commence on 1 July of the required reporting period, unless otherwise agreed by the CEO; (6) indicate the timing and content of the Impact Reconciliation Reports; and (7) be prepared in accordance with Instructions on how to prepare <i>Environmental Protection Act 1986 Part IV Impact Reconciliation Procedures and Impact Reconciliation Reports</i> (or any subsequent revisions).	Submit Sanjiv Ridge Stage 2 Project Impact Reconciliation Procedure to the CEO.	Letter and IRP to CEO.	Pre-Construction	Prior to ground-disturbing activities.	CLD	Completed. The Impact Reconciliation Procedure (179-EN-PLN-0004 v2) was approved by the DWER on 17 February 2023. Evidence: Appendix I: Confirmation of Approval of Impact Reconciliation Procedure version 2.
1197:M5-6	Offsets	The proponent must not commence ground disturbing activities until the CEO has confirmed by notice in writing that the Impact Reconciliation Procedure satisfies the requirements of condition 5-5.	Obtain written approval of IRP.	Letter from CEO.	Pre-Construction	Prior to ground-disturbing activities.	CLD	Completed. The Impact Reconciliation Procedure (179-EN-PLN-0004 v2) was approved by the DWER on 17 February 2023. Evidence: Appendix I: Confirmation of approval of Impact Reconciliation Procedure version 2.
1197:M5-7	Offsets	The proponent: (1) may review and revise the confirmed Impact Reconciliation Procedure; or (2) shall review and revise the confirmed Impact Reconciliation Procedure as and when directed by the CEO by a notice in writing.	Review/revise the IRP as needed.	Up to date IRP revisions, letter from/to CEO.	Overall	Life of Project.	C	Compliant.
1197:M5-8	Offsets	The proponent shall submit Impact Reconciliation Reports in accordance with the confirmed Impact Reconciliation Procedure.	Submit Impact Reconciliation Reports.	Letter and IRRs to CEO.	Overall	Life of Project.	C	Compliant. The first Impact Reconciliation Report (IRR) for the Project is due for submission 30 October 2025 and will cover the biennial reporting period 1 July 2023 to 30 June 2025.
1197:M5-9	Offsets	Despite payment of the provisional contribution, the proponent's liability to make a contribution under this condition shall be finally determined: (1) by the Minister upon application by the proponent in writing to the Minister to reduce in part or whole the proponent's liability under this condition where: (a) a payment has been made to satisfy a condition of an approval under the Environment Protection and Biodiversity Conservation Act 1999 in relation to the proposal; and/or (b) the payment is made for the purpose of counterbalancing impacts of the proposal on matters of national environmental significance identified in condition 5-1; or (2) to be equivalent to the provisional contribution if no application of the kind described in condition 5-9(1) is made within twelve (12) months of the conclusion of the relevant biennial reporting period.	Obtain final determination of liability from CEO in writing.	Letter from CEO.	Overall	Life of Project.	C	Compliant. During the reporting period Atlas did not submit an application in writing to reduce in part or whole Atlas Iron's liability under condition 5-9.

MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1197:M6-1	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 (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Letter notification to CEO as needed.	Letter to CEO.	Overall	Within twenty-eight (28) days of such change.	C	Compliant. A letter of notification of change was issued to DWER on 27 March 2024 informing of change of Atlas' physical address within twenty-eight (28) days. Evidence: Appendix K: Notification of Change of Proponent Address
1197:M7-1	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.	Letter to CEO confirming substantial commencement of project between Ministerial Approval and 5 years.	Letter to CEO.	Construction	Prior to 13 September 2027.	CLD	Completed. Substantial commencement of the Project occurred on 4 November 2023. Evidence: Appendix H: Notification of Substantial Commencement of the Project.
1197:M7-2	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.	Letter to CEO confirming substantial commencement of project between Ministerial Approval and 5 years.	Letter to CEO.	Construction	Following Substantial Commence ment.	CLD	Completed. Substantial commencement of the Project 4 November 2023. Evidence: Appendix H: Notification of Substantial Commencement of the Project.
1197:M8-1	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 8-6, or prior to ground disturbing activities , whichever is sooner.	Produce and submit CAP to the CEO.	CAP.	Pre-construction	At least six (6) months prior to the first Compliance Assessment Report required by condition 8-6, or prior to ground disturbing activities, whichever is sooner.	C	Compliant. Atlas continues to maintain the Compliance Assessment Plan (179-EN-PLN-0005 v1) which was approved by DWER on 8 December 2022, at least six (6) months prior to the commencement of ground disturbing activities on 4 November 2023. Evidence: Appendix J: Confirmation of approval of Compliance Assessment Plan version 2.
1197:M8-2	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.	Address in CAP.	Submitted CAP.	Pre-construction	Prior to Project Commence ment.	CLD	Completed. The Compliance Assessment Plan (179-EN-PLN-0005 v1) was approved by the DWER on 8 December 2022. Evidence: Appendix J: Confirmation of approval of Compliance Assessment Plan version 2.
1197:M8-3	Compliance Reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 8-2, the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 8-1.	Receive approval notice from the CEO, then assess compliance against all items.	CAR.	Overall	Life of Project.	C	Compliant. The Compliance Assessment Report (this report) was prepared in accordance with the approved Compliance Assessment Plan for the reporting period 13 September 2023 to 12 September 2024. This CAR addresses Atlas Irons compliance reporting requirements against MS 1197 conditions and commitments.
1197:M8-4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 8-1 and shall make those reports available when requested by the CEO .	Retain all reports on our ECMS and make available on request.	ECMS records.	Overall	Life of Project.	C	Compliant. All CARs will be retained on Atlas' document management system for a minimum of seven years following the relinquishment of MS 1197. Previous CARs can be made available to the CEO upon request.

MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1197:M8-5	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 CEO.	Overall	Within seven (7) days of that non-compliance being known.	C	Compliant. There were no potential non-compliances that occurred during the reporting period.
1197:M8-6	Compliance Reporting	<p>The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO.</p> <p>The Compliance Assessment Report shall:</p> <ol style="list-style-type: none"> (1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf; (2) include a statement as to whether the proponent has complied with the conditions; (3) identify all potential non-compliances and describe corrective and preventative actions taken; (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 8-1. 	Written correspondence.	Letter to CEO.	Overall	Fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO.	C	<p>Compliant.</p> <p>The first Compliance Assessment Report was submitted to the CEO on 9 December 2023, before fifteen (15) months from the date of issue of Ministerial Statement 1197.</p> <p>This CAR (this report) is for the reporting 13 September 2023 to 12 September 2024 and will be submitted to the CEO by 9 December 2024.</p> <p>This CAR:</p> <ol style="list-style-type: none"> (1) Has been endorsed by a delegate authorised to sign on Atlas' CEO's behalf (Section 3.3) (2) Includes a statement of compliance with conditions (Section 3.2) (3) Identifies any potential non-compliances and describes corrective & preventative actions taken (Section 4.4) (4) Will be published on the Atlas website (Evidence – Appendix F). (5) There are no proposed changes to the Compliance Assessment Plan. <p>Evidence: Environmental Publications can be found on the Atlas Iron website on Environmental Publications Archive - Atlas Iron.</p>
1197:M9-1	Public Availability of Data	Subject to condition 9-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal, the proponent shall make publicly available, in a manner approved by the CEO , all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	Make available on the Atlas's Website or other manner approved by CEO.	Website.	Overall	<p>Within thirty (30) days of the relevant report being submitted or relevant Management Plan being approved.</p> <p>Life of Project.</p>	C	Compliant. All reports and management plans relevant to the assessment of the project are publicly available on the Atlas Iron website. Environmental Publications can be found on the Atlas Iron website on Environmental Publications Archive - Atlas Iron .



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1197:M9-2	Public Availability of Data	If any data referred to in condition 9-1 contains particulars of: (1) a secret formula or process; or (2) confidential commercially sensitive information, or (3) sensitive Aboriginal cultural knowledge; the proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.	Written correspondence.	Letter to CEO.	Overall	If required.	IP	In Progress. The ACHMP has not been made publicly available and nor has any environmental data that may be available in the ACHMP due to reasons of sensitive Aboriginal cultural knowledge. Further to written requests in 2023/2024 Atlas met with Nyamal Aboriginal Corporation in September 2024 and was advised that all culturally sensitive information shall remain confidential due to 'sensitive Aboriginal cultural knowledge'. A letter to the CEO will be submitted requesting approval for culturally sensitive information to remain confidential for the life of the Project.



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2

5 References

OEPA (Office of the Environmental Protection Authority). 2012. Post Assessment Guideline for Preparing a Compliance Assessment Report. Office of the Environmental Protection Authority, Perth, Western Australia. PAG 3. August 2012.



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2

Appendix A. Extent of native vegetation clearing

MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2

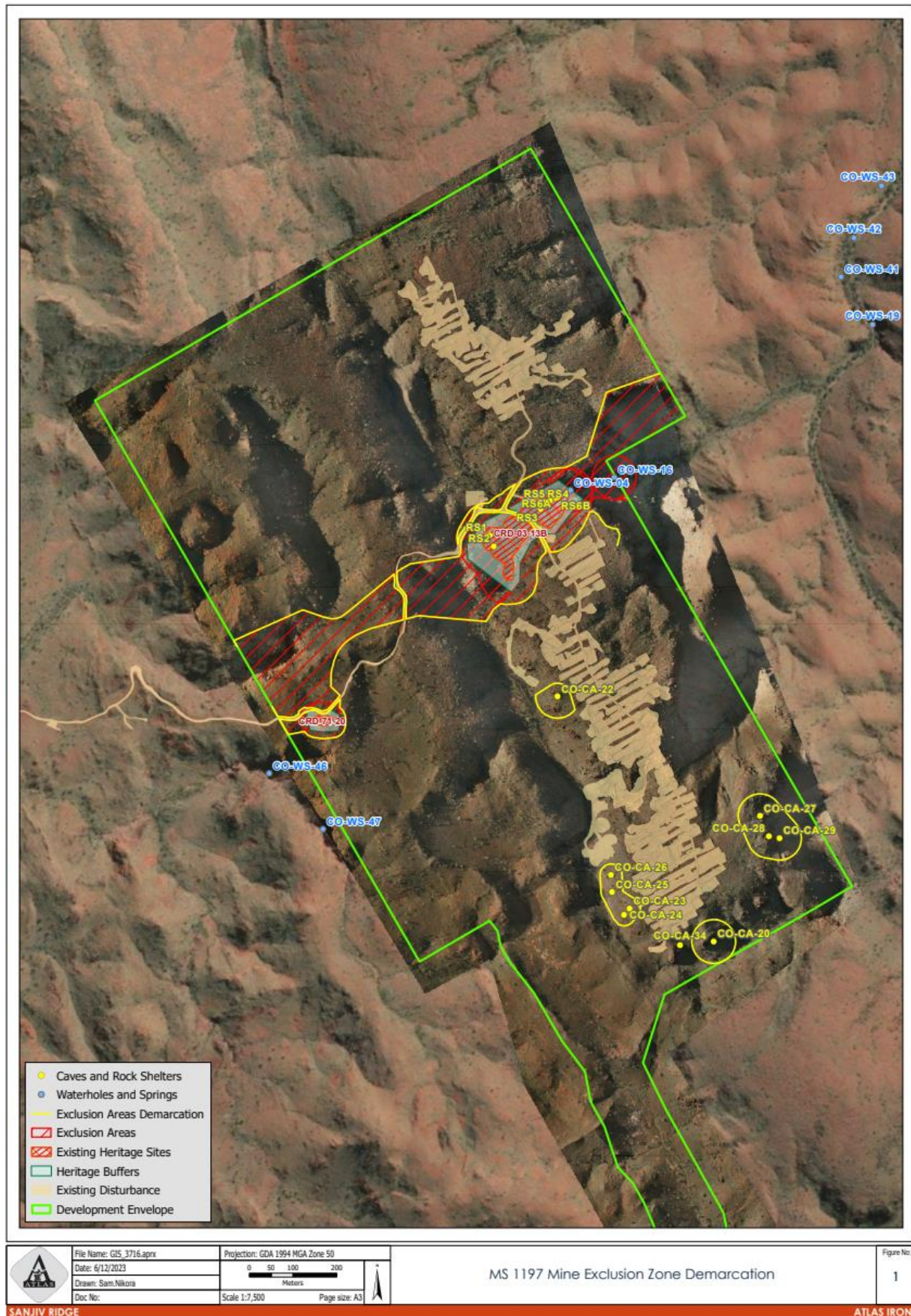




Appendix B. MS 1197 Mine Exclusion Zones Demarcation

MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2





Appendix C. Monthly Cave Inspection Template

Inspection - Environmental

Inspection - Environmental Report - Environmental - Cave Inspection

Environmental - Cave Checklist

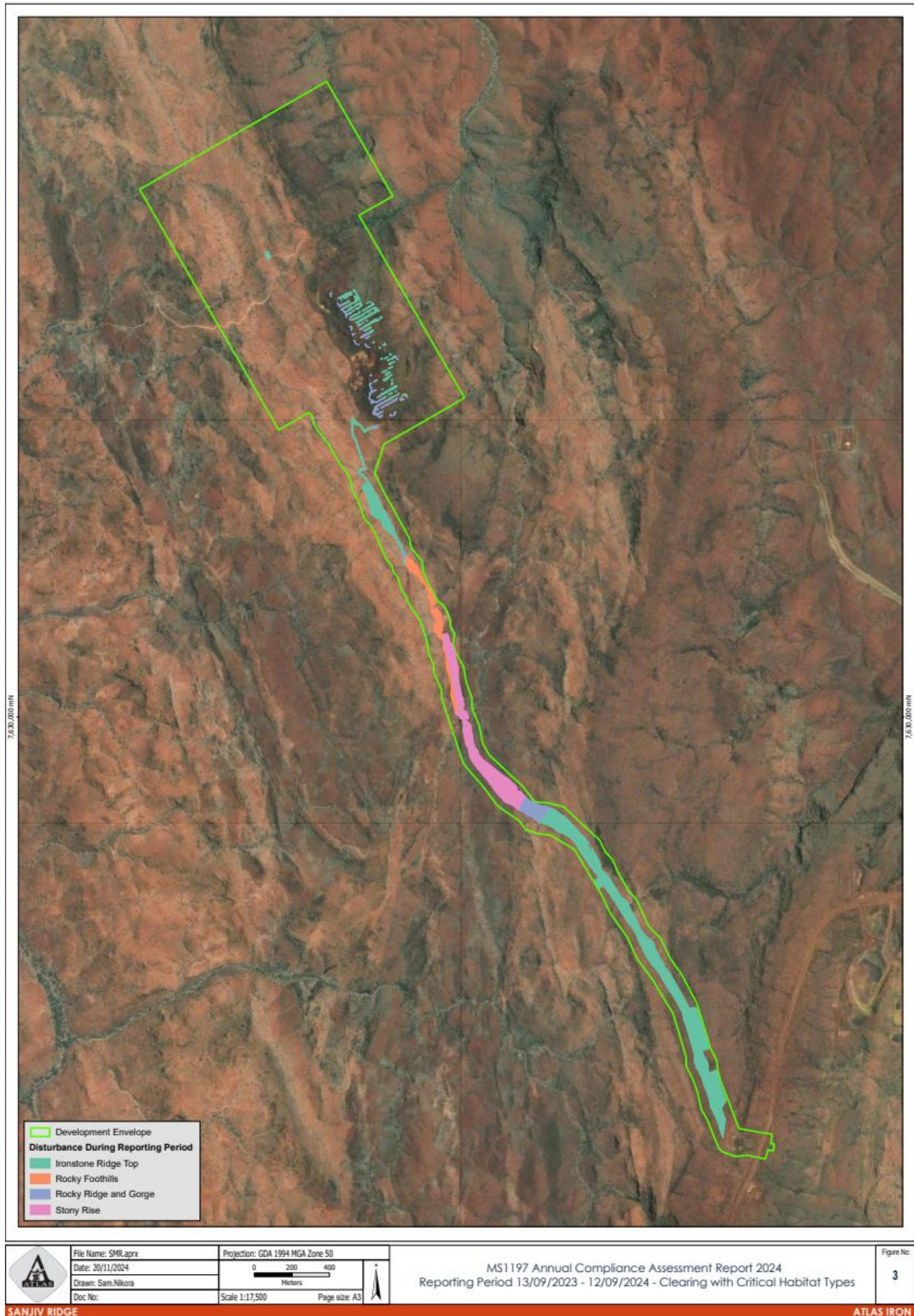
9377

Environmental - Cave Inspection - Environmental - Cave Inspection

Item #	Prompt	Responses	Comments
1	PPE Requirements - Hard hat/caving helmet, head torch	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Assessed	
2	Entrance Safety Assessment - Is water flowing/dripping within the cave?	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Assessed	
3	Entrance Safety Assessment - Is there mobile equipment working within 200m of the cave? Is blasting occurring within 200m of the cave?	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Assessed	
4	Entrance Safety Assessment - Are there any perceived wildlife dangers within the cave? (e.g. snakes)	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Assessed	
5	Entrance Safety Assessment - Are there any signs of recently displaced rock fall?	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Assessed	
6	Visual Assessment Notes - Are there any new open or intersecting joints or fractures along the roof, wall, or bedding planes?	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Assessed	
7	Visual Assessment Notes - Are there any new loose rocks or signs of fresh rock fall within the cave? I	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Assessed	
8	Entrance to Roosting Chamber - Are there any new open or intersecting joints or fractures along the roof, wall, or bedding planes?	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Assessed	
9	Entrance to Roosting Chamber - Are there any new loose rocks or signs of fresh rock fall within the cave?	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Assessed	
10	Roosting Chamber - Are water seeps present?	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Assessed	
11	Roosting Chamber - Are there any new open or intersecting joints or fractures along the roof, wall, or bedding planes?	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Assessed	
12	Roosting Chamber - Are there any new loose rocks or signs of fresh rock fall within the cave?	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Assessed	



Appendix D: Extent of clearing in fauna habitat type(s):
Ironstone Ridgetop, Rocky Ridge and Gorge, Stoney Rises,
and Rocky Foothills.





Appendix E. Confirmation of Approval of Significant Species Management Plan, version 7.



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Government of Western Australia
Department of Water and Environmental Regulation

Your ref: 179-EN-PLN-0002 v7
Our ref: DWERT11253
Enquiries: Nick Gibb, Ph 6364 7917

Theo Sprenkels
Environment Superintendent
Atlas Iron Pty Ltd
Level 17, 300 Murray St
Perth WA 6000

Via email: theo.sprenkels@atlasiron.com.au

Dear Mr Sprenkels

Ministerial Statement 1197 – Sanjiv Ridge Project - Stage 2 – Environmental Management Plan – Approved

Thank you for your letter of 1 August 2023 submitting the Significant Species Management Plan, Atlas Iron, version 7, to the Department of Water and Environmental Regulation (DWER) for review.

I note the plan has been prepared to satisfy condition 2-4 of Ministerial Statement 1197 which states:

- 2-4 The proponent must not commence ground disturbing activities until the CEO has confirmed in writing that the Significant Species Management Plan satisfies the requirements of condition 2-3.

I am satisfied that the Significant Species Management Plan, version 7, 1 August 2023, meets the requirements of condition 2-4 of Ministerial Statement 1197, and that the proponent must now implement the provisions of the Management Plan as required by condition 2.5.

Yours sincerely

Dr Tania Liaghati
Manager
EIA North Branch
for the Chief Executive Officer under authorisation dated 7 October 2022

24 August 2023

Prime House, 8 Davidson Terrace Joondalup Western Australia 6027
Locked Bag 10 Joondalup DC WA 6919
Telephone: 08 6364 7000 Facsimile: 08 6364 7001
www.dwer.wa.gov.au



Appendix F. Confirmation of Approval of Aboriginal Cultural Heritage Management Plan, version 3.



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Government of Western Australia
Department of Water and Environmental Regulation

Your ref: 179-HE-PLN-0001 v3
Our ref: APP-0000197
Enquiries: Nick Gibb, Ph 6364 7917

Chris Deans
Executive General Manager
Atlas Iron Pty Ltd
Level 17, 300 Murray St
Perth WA 6000

Via email: Chris.Deans@atlasiron.com.au

Dear Mr Deans

MINISTERIAL STATEMENT 1197 – SANJIV RIDGE PROJECT – STAGE 2 – ABORIGINAL CULTURAL HERITAGE MANAGEMENT PLAN – APPROVED

Thank you for submitting the Aboriginal Cultural Heritage Management Plan (ACHMP), (version 3, 8 June 2023) to the Department of Water and Environmental Regulation (DWER) for review.

I note the plan has been prepared to satisfy condition 4-3 of Ministerial Statement 1197 (MS1197).

You are reminded that, consistent with condition 4-9, the ACHMP shall be reviewed and revised in consultation with the Nyamal Aboriginal Corporation as and when directed by the Chief Executive Officer of DWER. As a result, it is recommended that you continue to consult with the NAC during the implementation of the Plan.

Noting that the *Aboriginal Cultural Heritage Act 2021* has been announced to be repealed, it is expected that the ACHMP is revised within 4 weeks of the *Aboriginal Heritage Legislation Amendment and Repeal Bill 2023* being enacted. The revised plan must be submitted for review and approval by the Chief Executive Officer of DWER.

Prime House, 8 Davidson Terrace Joondalup Western Australia 6027
Locked Bag 10 Joondalup DC WA 6919
Telephone: 08 6364 7000 Facsimile: 08 6364 7001
www.dwer.wa.gov.au



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2

Notwithstanding the above, I am satisfied that the ACHMP, (version 3, 8 June 2023) meets the requirements of condition 4-3 of MS1197, and that the proponent must now implement the provisions of the Management Plan as required by condition 4-5.

Yours sincerely

Dr Tania Liaghati

Manager, EIA North Branch

EPA Services

for the Chief Executive Officer under authorisation dated 7 October 2022

04 October 2023



Appendix G. Notification of Substantial Commencement of the Project.



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Saturday, 11 November 2023

Senior Manager, Compliance Branch (Ministerial Statements)
Department of Water and Environmental Regulation
Prime House, 8 Davidson Terrace
Joondalup WA 6027

Attention: Senior Manager, Compliance Branch

RE: Sanjiv Ridge DSO Project, Ministerial Statement No. 1197 – Time Limit for Proposal Implementation

As per Condition 7-2 of MS 1197 for the above Project, please be advised that:

Condition 7-1: Atlas Iron Pty Ltd (Atlas) commenced substantial implementation of the proposal on Saturday 4 November 2023. Implementation of the proposal occurred within 5 years of the publishing date of MS 1197 (i.e. 12 September 2022).



Figure 1 - Substantial Commencement of the action

Condition 7-2: This letter is considered by Atlas to be written evidence of implementation of the proposal, and has been provided prior to the expiration date of MS 1197 (i.e. 12 September 2027).

Please do not hesitate to contact me on 0422 014 390 if you require any additional information or have any questions.

Yours sincerely,

Theo Sprenkels
Environment Superintendent

Atlas Iron Pty Ltd ABN 63 110 396 168

Level 17, Raine Square
300 Murray Street
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MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2

Appendix H. Confirmation of Approval of Impact Reconciliation Procedure, version 2.



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Government of Western Australia
Department of Water and Environmental Regulation

Your ref: 179-EN-PLN-0004 v2
Our ref: DWERT11358
Enquiries: Dave Abdo, Ph 97264146

David Morley
Principal Approvals Advisor
Atlas Iron Pty Ltd
PO Box 7071
Cloisters Square PO WA 6850

Dear Mr Morley

SANJIV RIDGE PROJECT STAGE 2 – ATLAS IRON PTY LTD – IMPACT RECONCILIATION PROCEDURE – APPROVED

Thank you for submitting the amended Sanjiv Ridge Project Stage 2 Impact Reconciliation Procedure (179-EN-PLN-0004 v2) (the IRP), to the Department of Water and Environmental Regulation (DWER) for review, in accordance with Conditions 5 of Ministerial Statement 1197 (MS 1197). The amended IRP was received by DWER on 22 December 2022, along with additional spatial data updates received on 15 February 2023.

DWER has reviewed the amended IRP against the requirements of Condition 5 and considers that the amended IRP meets the requirements of Condition 5 of MS 1197.

DWER prefers that Impact Reconciliation Report (IRR) submissions are emailed (but will also accept documents and CDs submitted by post), please send IRR email submissions to:

- registrar@dwer.wa.gov.au; and
- peof@dwer.wa.gov.au

Where files exceed 25 MB, please contact DWER (via the above email addresses) to arrange uploading to the Cloud. An IRR data package must be submitted with an IRR as an attachment.

If you have any queries regarding this correspondence, please contact Dr Dave Abdo on 9726 4146 or dave.abdo@dwer.wa.gov.au.

Yours sincerely

Dr Tania Liaghati
Manager, EIA North Branch
EPA Services

17 February 2023

Prime House, 8 Davidson Terrace Joondalup Western Australia 6027
Locked Bag 10 Joondalup DC WA 6919
Telephone: 08 6364 7000 Facsimile: 08 6364 7001
www.dwer.wa.gov.au



Appendix I. Confirmation of Approval of Compliance Assessment Plan, version 2.



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Government of Western Australia
Department of Water and Environmental Regulation

Your ref: 179-EN-PLN-0005 MS1197
Our ref: DWERDT672041
Enquiries: Leah Petrie, Ph (08) 6364 7216

Mr Theo Sprenkels
Environmental Superintendent
Level 17, Raine Square
300 Murray Street
Perth WA 6000

Dear Mr Sprenkels,

MINISTERIAL STATEMENT 1197 – SANJIV RIDGE PROJECT – STAGE 2 – COMPLIANCE ASSESSMENT PLAN APPROVAL

I refer to the *Sanjiv Ridge Project – Stage 2 Compliance Assessment Plan (CAP)* submitted by Atlas Iron Pty Ltd on 16 October 2022.

The Department of Water and Environmental Regulation (the department) has reviewed the CAP and determined it to meet the requirements of Conditions 8-1 and 8-2 of Ministerial Statement 1197. Any future amendments to the CAP are to be submitted to the department for approval.

As per Condition 8-6, your first compliance assessment report is due on 13 December 2023 and annually thereafter. All correspondence relating to the statement should be addressed to the Senior Manager, Environmental Compliance at compliance@dwer.wa.gov.au.

If you have any queries, please contact Leah Petrie on (08) 6364 7216 or Leah.Petrie@dwer.wa.gov.au.

Yours sincerely

Kelly Faulkner
**EXECUTIVE DIRECTOR
COMPLIANCE AND ENFORCEMENT**

*for the Chief Executive Officer
under Notice of Delegation date 25 October 2021*

8 December 2022

Prime House, 8 Davidson Terrace Joondalup Western Australia 6027
Locked Bag 10 Joondalup DC WA 6919
Telephone: 08 6364 7000 Facsimile: 08 6364 7001
www.dwer.wa.gov.au



Appendix J. Notification of Change of Proponent Address



MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



Wednesday, 27 March 2024

Compliance Branch (Ministerial Statements)
Department of Water and Environmental Regulation
Prime House, 8 Davidson Terrace
Joondalup WA 6027

Attention: Compliance Branch (Ministerial Statements)

Notification of Change of Proponent Address

As part of several Ministerial Statement conditions issued to Atlas Iron Pty Ltd (Atlas), there is a requirement to notify the CEO of the Department of Water and Environmental Regulation (DWER) of any changes to their contact details, namely their physical address, within **twenty-eight days** of this change.

Atlas would like to notify DWER that as of COB 15th March 2024, Atlas relinquished their principal place of business address of Level 17 Raine Square, 300 Murray Street, Perth. They will be relocating their principal place of business address to **1314 Hay Street, West Perth (6005)**, with the intention of occupying these offices by the 3 April 2024.

Atlas' current list of active Ministerial Statements is outlined below (Table 1). Should any correspondence need to be communicated through to Atlas, can we request these be distributed via email in the interim, or be sent to the newly nominated address after the designated relocation date of 3 April 2024.

Table 1: Atlas' current list of active Ministerial Statements and associated conditions.

Project	Statement No.	Project Title	Approval Date	Condition
Sanjiv Ridge	1125	Corunna Downs Project	12 March 2020	2-1
"The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State."				
Sanjiv Ridge	1197	Sanjiv Ridge Project – Stage 2	13 September 2022	6-1
"The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State."				
Miralga Creek	1154	Miralga Creek DSO Project	23 November 2020	2-1
"The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State."				
Pardoo	775	Pardoo Iron Ore Mine	03 October 2008	2-2
"The proponent shall notify the Chief Executive Officer (CEO) of the Department of Environment and Conservation of any change of the name and address of the proponent for the serving of notices or other correspondence within 30 days of such change."				

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West Perth WA 6005

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E atlas@atlasiron.com.au
W atlasiron.com.au

Atlas Iron Pty Ltd ABN 63 110 396 168

MS1197 Compliance Assessment Report 2023-2024

Sanjiv Ridge Direct Shipping Ore (DSO) Project – Stage 2



A completed *Post Assessment Form 3 - Notification of Change of Proponent Address and or Name* has also been supplied with the change of address details and relevant contact information should there be any further queries.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Theo Sprenkels'.

Theo Sprenkels
Environment Superintendent

Attachments - FORM_PAF3-Notification of Change of Proponent Address and or Name - 2017