

North Kiaka Project Quartzite Mine Expansion

Simcoa Operations Pty Ltd (SIMCOA)

Annual Compliance Report EPBC 2021/9089

72574 | 178,224 (Rev 0)

6 October 2026



We acknowledge the Traditional Custodians of Country throughout Australia and their connection to land, sea and community.

We pay our respect to Elders past, present and emerging and in the spirit of reconciliation we commit to working together for our shared future where every person is respected, valued and has strong sense of belonging.

Caring for Country The Journey of JBS&G
Artist: Patrick Caruso, Eastern Arrernte



Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed



Full name (please print)

___ Greg Phyffer _____

Position (please print)

___ Mine Manager _____

Organisation (please print including ABN/ACN if applicable)
064 653 ___

___ Simcoa Operations Pty Ltd / ABN: 42 009

Date

___ 06 ___ / ___ 10 ___ / ___ 2026 ___

Table of Contents

1.	Introduction	4
1.1	Purpose of this Report	4
1.2	Project Background	4
2.	Current Status	4
3.	Audit Methodology	5
3.1	Audit Plan	5
3.1.1	Purpose and Scope	5
3.1.2	Methodology	5
3.1.3	Audit Terminology	5
4.	Audit Results	7
4.1	Compliance with Conditions of EPBC 2021/9089	7
4.2	Non-compliance	7
4.3	Environmental Risks	7
5.	References	8

List of Tables

Table 1: Summary of the Project	1
Table 2: Key characteristics of the Project	1
Table 3: Persons Consulted during the Audit	5
Table 4: Action Implementation Status	6

List of Figures

Figure 1: Project Location	5
Figure 2: North Kiaka Development Envelope and Disturbance Footprint	3

Appendices

Appendix A	EPBC Approval 2021/9089
Appendix B	Compliance with Conditions of EPBC 2021/9089

Abbreviations

Term	Definition
ACR	Annual Compliance Report
DAWE	Department of Agriculture, Water and the Environment
DBCA	Department of Biodiversity, Conservation and Attractions
DCCEEW	Department of Climate Change, Energy, Environment and Water
DE	Development Envelope
DMPE	Department of Mines, Petroleum and Exploration
EPBC	Environment Protection and Biodiversity Conservation
GWL	Groundwater licence
KSIA	Kemerton Strategic Industrial Area
MNES	Matters of National Environmental Significance
tpa	tonnes per annum
WA	Western Australia
WRL	waste rock landforms

1. Introduction

1.1 Purpose of this Report

This Annual Compliance Report (ACR) addresses the status and compliance of Simcoa Operations Pty Ltd (SIMCOA) with the conditions of *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval 2021/9089 (EPBC 2021/9089; **Appendix A**). This report has been prepared for the purpose of meeting the requirements of Condition 16, 17 and 18 of EPBC 2021/9089, which requires SIMCOA to verify compliance with the conditions of the EPBC approval by preparing an ACR. This ACR assesses the reporting period 17 September 2025 to 16 September 2026, as this period is one year following the date the EPBC approval “date of decision”. This is the first ACR to be prepared under EPBC 2021/9089.

1.2 Project Background

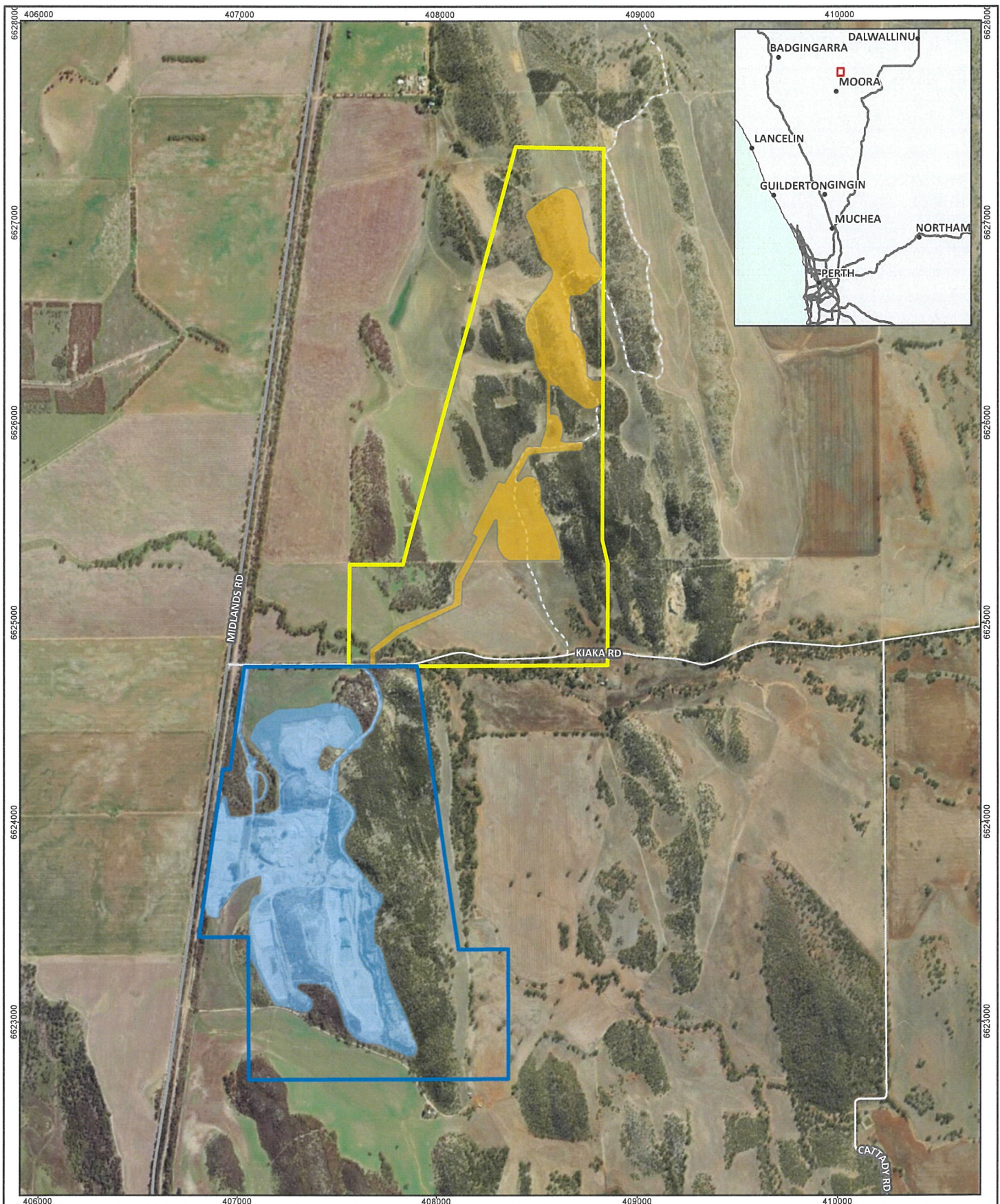
SIMCOA currently operate the Moora Quartzite Mine (Moora Mine), approximately 15 km north of Moora (refer to; **Figure 1**), in the Wheatbelt of Western Australia (WA). The Moora Mine is located on tenements M70/191, G70/91, G70/92, G70/93, and M70/1292. The mine has been operating for over 30 years and includes several existing activities.

A proposed expansion of the existing Moora Mine, known as the North Kiaka Project Quartzite Mine Expansion (the Project) (**Figure 2**), was referred to the then Commonwealth Department of Agriculture, Water and the Environment (DAWE), now the Department of Climate Change, Environment, Energy and Water (DCCEEW), on 25 November 2021. The Project was determined to be a controlled action, requiring assessment and approval under the EPBC Act. The impacts of the Project on Matters of National Environmental Significance (MNES) (listed threatened species and communities) protected under the EPBC Act were assessed under Accredited Assessment under the *Environmental Protection Act 1986* (EP Act) between the WA and the Commonwealth Government. In September 2025, SIMCOA received environmental approval from DCCEEW for the Project.

The existing Moora Mine comprises two pits: Main Pit and West Pit, generating 420,000 tonnes per annum (tpa) silica ore. Mined ore is processed through an onsite crushing and screening plant to produce approximately 130,000 tpa of high purity quartzite and approximately 290,000 tpa of waste rock. Processed ore is trucked offsite to the Kemerton Silicon Smelter. Waste rock is deposited on onsite waste rock landforms (WRLs). Mining operations at both open pits are approved to extend below the water table.

The Project consists of one open pit, with mining methods to replicate those currently undertaken at the Moora Mine. The ore body will be mined via drill and blast methods to construct a single open pit above the water table, with a maximum depth of 46 m below ground level. The quartzite material from the North Kiaka pit will be transported, via connecting haul roads, to the Moora Mine for crushing and screening prior to transport of quartzite ore to the Kemerton Smelter in the Kemerton Strategic Industrial Area (KSIA). Waste rock from the mining of the North Kiaka pit will be deposited at the Tonkin WRD, located approximately 0.5 km south of the mine pits, on farmland previously cleared of native vegetation. The predicted life of mine is 19 years for North Kiaka.

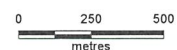
A summary of the Project and the key characteristics are provided in **Table 1** and **Table 2**.



Legend

- North Kiaka Mine Development Envelope
 - Moora Mine Development Envelope
 - North Kiaka Mine Disturbance Footprint
 - Moora Mine Disturbance Footprint
- Roads (LGATE-195)
- Major road
 - Minor road
 - Track

Scale: 1:25,000 at A4



Coord. Sys. GDA2020 MGA Zone 50



Job Number: 71249

Client: Simcoa

Version: A

Date: 02-Apr-2026

Drawn By: jcrute

Checked By: CIngram

**Moora and North Kiaka Mines,
Midlands Rd,
Moora, WA**

PROJECT LOCATION

FIGURE 1



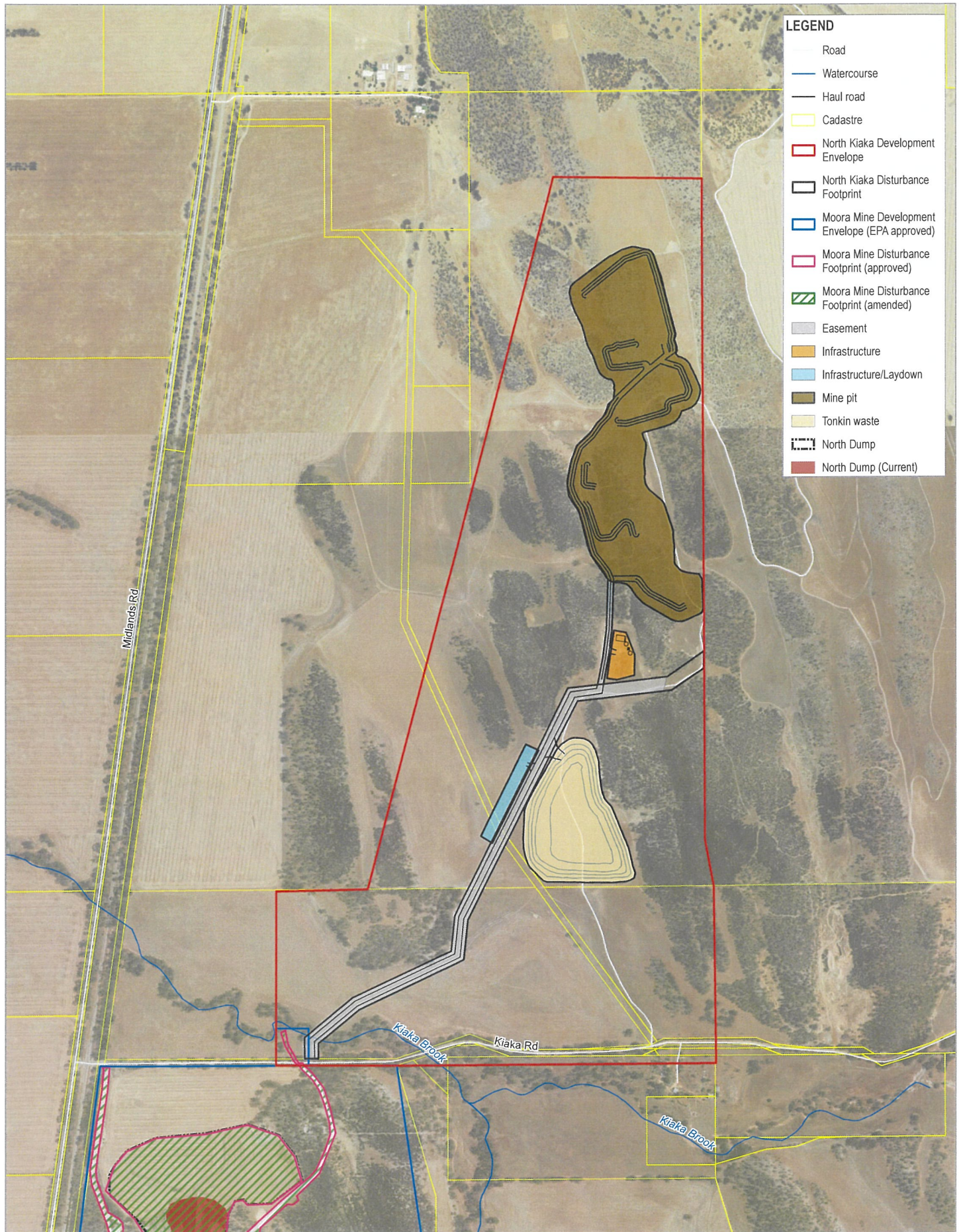
Table 1: Summary of the Project

Summary of the Project	
Project title	North Kiaka Project Quartzite Mine Expansion
Proponent name	Simcoa Operations Pty Ltd (SIMCOA)
EPBC Approval	EPBC 2021/9089
ABN / ACN	42 009 064 653 / 009 064 653
Short description	The Project is to develop a new quartzite mine at the North Kiaka Development Envelope (DE), located 15km north of Moora, Western Australia. The North Kiaka DE is approximately 2 km north-east of the Moora Mine. The Project includes the establishment of: • One mine pit • One WRL (Tonkin WRL) • Hydrocarbon storage area • A linear infrastructure access corridor (easement) • Internal access roads. Associated infrastructure such as workshops, offices, ablutions, car park, laydown and stockpile areas and a weighbridge. The North Kiaka DE layout is shown in Figure 2. It is anticipated the Project will generate approximately 130,000 tpa of lump quartz. Mining and processing of ore at the Project will be undertaken within daylight hours, six (6) days a week, with approximately 12 people onsite.

Table 2: Key characteristics of the Project

Elements	Proposed extent
Physical Elements	
Mine	The Project will include the development of: • One mine pit • One WRL (Tonkin WRL) • An easement linking North Kiaka DE to Moora Mine • Internal access roads.
Associated infrastructure	The development of the Project will require the following infrastructure for operational purposes: • Administration buildings • Car park • Product stockpiles • Weighbridge • Process area and workshops (to include hydrocarbon storage, refuelling facility, and washdown bay).
Operational Elements	
Water demand	Water requirements for the Project will be sourced from the Moora Mine groundwater bore, which is governed by groundwater licence GWL 104693(6). It is not anticipated that the water requirements for the development and operation of the Project will exceed the current licence. SIMCOA will seek an amendment to the current licence (GWL 104693(6)) to authorise the use of water within mining tenements M70/1292. Upon closure of the Moora

Elements	Proposed extent
	Mine, if required, SIMCOA will seek the necessary approvals under the <i>Rights in Water and Irrigation Act 1914</i> (RiWI Act) to access and use groundwater for the ongoing activities of the Project.
Power	Power for the Project will be provided via an onsite diesel generator.
Overburden / Waste Rock	The Project includes areas for waste rock to be stored, specifically the Tonkin WRL. The WRL has been designed based on the waste having a swell factor of 30%, due to blasting of the rock. The WRL has also been designed to accommodate waste from the pit on the assumption the pits will be partially back filled. The WRL is in an area which has been previously cleared of native vegetation, thereby minimizing the disturbance to native vegetation. The design and location of the WRL will also act as a weed buffer for the adjacent remnant vegetation.
Ore Processing	The processed ore will be transported by dump truck to the Moora Mine where it will be processed and stockpiled before being transported to the Kemerton Smelter.
Ore transport	As per the operations of the Moora Mine, the quartzite ore will be transported via covered truck to Kemerton Smelter located in the KSIA, approximately 17 km north-east of Bunbury in the South West of WA.



Paper Size ISO A3
0 100 200 300
Metres

Map Projection: Transverse Mercator
Horizontal Datum: GDA 1994
Grid: GDA 1994 MGA Zone 50



Simcoa Operations Pty Ltd
Simcoa Environmental Approvals s40AA ERD
Development Envelope and
Disturbance Footprint
North Kiaka DE
and Disturbance Footprint

Project No. 12518217
Revision No. 0
Date 07/06/2023

FIGURE 2

2. Current Status

The Project has not yet commenced. During the reporting period only significant flora and vegetation surveys were undertaken within the Project area. Work was also undertaken at the offset sites, including fencing, installation of firebreaks and weed control.

Clearing, construction and earthworks are expected to commence in the Project area during 2027. Works will also continue at the direct and indirect offsets sites.

3. Audit Methodology

3.1 Audit Plan

3.1.1 Purpose and Scope

This document has been prepared to assess compliance of the Project with the conditions of EPBC 2021/9089 and in doing so address conditions 16, 17 and 18 which state:

16) The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period).

17) The approval holder must ensure each compliance report includes:

a) accurate and complete details of compliance and any non-compliance with:

i) each condition attached to this approval decision, and

ii) all commitments made in each plan,

b) a schedule of all plans in effect in relation to these conditions during the ACR period,

c) accurate and complete details of how each plan was implemented during the ACR period, and

d) if any incident occurred, accurate and complete details of each incident.

18) The approval holder must ensure each compliance report is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.

Any potential non-compliance detected during the reporting period will be provided to the Department at the same time the ACR is published on the Simcoa (Moora Mine) website as required by condition 19.

This ACR addresses the audit period between 17 September 2025 to 16 September 2026. The ACR addresses each condition of EPBC 2021/9089.

3.1.2 Methodology

This ACR was prepared by Tracey Parker (Associate of JBS&G), who is a qualified and registered Exemplar Global Environmental Management Systems Auditor (Certificate No: 134946). The compliance assessment was completed by review of SIMCOA information/documentation. Key persons consulted during the compliance audit are listed in **Table 3** below.

Table 3: Persons Consulted during the Audit

Person and Position	Organisation	Purpose
Chris Naude, Technical Superintendent	SIMCOA	Verification of compliance status of the Project

3.1.3 Audit Terminology

DCCEE (2023) has published ACR Guidelines and terminology from this guidance was applied in this audit (refer to **Table 4**). The Audit Table (refer to **Appendix B**) describes the implementation of actions and compliance with the approval utilising the terminology from **Table 4**.

Table 4: Action Implementation Status

Status	Description
Compliant	'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Non-compliant	A designation of 'non-compliant' must be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not applicable	A designation of 'not applicable' must be given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition that applies to an activity that has not yet commenced.

Source: DCCEEW (2023)

4. Audit Results

The results of the audit of EPBC 2021/9089 are shown in **Appendix B**. A total of 35 conditions were audited from EPBC 2021/9089 during this audit. A statement of compliance is included below.

4.1 Compliance with Conditions of EPBC 2021/9089

Of the 35 conditions in EPBC 2021/9089 (Appendix B):

- 27 were assessed as 'Compliant'; and
- Eight (8) were assessed as "Not applicable".

4.2 Non-compliance

There were no non-compliances identified for EPBC 2021/9089, for the reporting period.

4.3 Environmental Risks

The Project has not yet commenced; there are no environmental risks to report.

5. References

The Department of Climate Change, Energy, Environment and Water (DCCEEW) 2023, Annual Compliance Report Guidelines. Reporting under the *Environment Protection and Biodiversity Conservation Act 1999*, Commonwealth of Australia.

Appendix A EPBC Approval 2021/9089



Notification of approval decision

North Kiaka Project Quartzite Mine Expansion, WA (EPBC 2021/9089)

This decision is made under section 130(1) and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Note that section 134(1A) of the EPBC Act also applies to this approval. That provision provides, in general terms, that if the approval holder authorises another person to undertake any part of the Action, the approval holder must take all reasonable steps to ensure that the other person is informed of any conditions attached to this approval, and that the other person complies with any such conditions.

Approved Action

person to whom the approval is granted (approval holder)	Simcoa Operations Pty Ltd ACN: 009 064 653
Action	To expand the existing Moora Mine, located 15 km north of the Moora town site, approximately 160 km north of Perth, in the Shire of Moora, WA [See EPBC Act referral 2021/9089]

Approval decision

decision	My decision on whether or not to approve the taking of the Action for the purposes of the controlling provision for the Action is as follows.	
	Controlling Provision	Decision
	Listed threatened species and communities (section 18 and section 18A)	Approved
period for which the approval has effect	This approval has effect until 1 September 2057	
conditions of approval	The approval is subject to conditions under the EPBC Act as set out in Annexure A.	

Person authorised to make decision

name and position	Kylie Calhoun Branch Head Environment Assessments West
signature	
date of decision	17 September 2025

Annexure A

Note: Words and terms appearing in **bold** (excluding headings) have the meaning assigned to them at **Part C – Definitions**.

Part A – Avoidance, mitigation, and compensation conditions

CLEARING LIMITS

- 1) The approval holder must not:
 - a) **Clear** outside of the **Action area**.
 - b) **Construct** outside of the **Action area**.
- 2) The approval holder must not **clear** more than:
 - a) 15.58 hectares (ha) of **Carnaby's Black Cockatoo foraging habitat**.
 - b) 17 individuals of ***Acacia aristulata***.
 - c) 15 individuals of ***Daviesia dielsii***.

ENVIRONMENTAL MANAGEMENT PLAN

- 3) To avoid and mitigate **harm** to **Carnaby's Black Cockatoos**, ***Acacia aristulata*** and ***Daviesia dielsii*** as a result of the **Action**, the approval holder must commence implementing the **Environmental Management Plan (EMP)** no later than the **commencement of the Action** and continue to implement the **EMP** until the expiry date of this approval.

OFFSETS

- 4) To compensate for the residual significant impacts of the **Action** on **Carnaby's Black Cockatoo**, ***Acacia aristulata*** and ***Daviesia dielsii***, the approval holder must commence implementation of the **Offset Management Plan (OMP)** no later than the **commencement of the Action** and continue to implement the **OMP** at least until the expiry date of this approval. The approval holder must achieve the following environmental outcomes:
 - a) the **habitat quality** of at least 124.67 ha of **Carnaby's Black Cockatoo foraging habitat** at **Cairn Hill Nature Reserve** is a 7 out of 10 at the **commencement of the Action** and is maintained at a 7 out of 10 habitat quality at least until the expiry date of this approval.
 - b) the **habitat quality** of at least 4.33 ha of **Carnaby's Black Cockatoo foraging habitat** at **Cairn Hill North** is a 7 out of 10 at the **commencement of the Action** and is maintained at a 7 out of 10 habitat quality at least until the expiry date of this approval.
 - c) the **baseline population** of ***Acacia aristulata*** and ***Daviesia dielsii*** at the **Offset sites** are maintained or exceeded for the life of this approval.

- 5) The approval holder must, within 5 **business days** of commencing implementation of the **OMP**, notify the **department** of the date on which implementation of the **OMP** commenced.
- 6) The approval holder must ensure **Cairn Hill North** becomes a Class A Nature Reserve vested with the Conservation and Parks Commission and managed by **DBCA**, 5 years after the date of approval.
- 7) The approval holder must manage **Cairn Hill North** in accordance with the **OMP** until the **DBCA** assumes management of **Cairn Hill North**.

Part B – Administrative conditions

COMMENCEMENT OF THE ACTION

- 8) The approval holder must notify the **department** electronically of the date of **commencement of the Action**, within 5 **business days** following **commencement of the Action**.
- 9) The approval holder must not **commence the Action** later than 5 years the date of this approval decision.

COMPLIANCE RECORDS

- 10) The approval holder must maintain accurate and complete **compliance records** and document the procedure for recording and storing **compliance records**.
- 11) If the **department** makes a request in writing, the approval holder must provide electronic copies of **compliance records** to the **department** within the timeframe specified in the request.

Note: **Compliance records** may be subject to audit by the **department**, or by an **independent auditor** in accordance with section 458 of the **EPBC Act**, and/or be used to verify compliance with the conditions. Summaries of the results of an audit may be published on the **department's** website or through the general media.

- 12) The approval holder must ensure that any **monitoring data**, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the *Guidelines for biological survey and mapped data*, Commonwealth of Australia 2018, or as otherwise specified by the **Minister** in writing.
- 13) The approval holder must ensure that any **monitoring data**, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the *Guide to providing maps and boundary data for EPBC Act projects*, Commonwealth of Australia 2021, or as otherwise specified by the **Minister** in writing.
- 14) The approval holder must ensure that any assessment of **habitat quality for Carnaby's Black Cockatoo foraging habitat** is conducted by an **independent suitably qualified ecologist**.
- 15) The approval holder must submit all **monitoring data**, surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the **department** within 20 **business days** of the next anniversary of the date of this approval decision except where otherwise specified in a **plan**.

ANNUAL COMPLIANCE REPORTING

- 16) The approval holder must prepare a **compliance report** for each **Annual Compliance Report period (ACR period)**.
- 17) The approval holder must ensure each **compliance report** includes:
 - a) accurate and complete details of compliance and any non-compliance with:
 - i) each condition attached to this approval decision, and
 - ii) all commitments made in each **plan**,
 - b) a schedule of all **plans** in effect in relation to these conditions during the **ACR period**,
 - c) accurate and complete details of how each **plan** was implemented during the **ACR period**, and
 - d) if any **incident** occurred, accurate and complete details of each **incident**.
- 18) The approval holder must ensure each **compliance report** is consistent with the *Annual Compliance Report Guidelines*, Commonwealth of Australia 2023.
- 19) The approval holder must, within 20 **business days** following the end of each **ACR period**, in a format that is easily accessible and downloadable, publish on the **website**:
 - a) each **compliance report**, and
 - b) a **shapefile** showing all **clearing of protected matters**, and their habitat, undertaken within the **ACR period**.
- 20) The approval holder must:
 - a) Exclude or redact **sensitive biodiversity data** from each **compliance report** and **shapefile** published on the **website** or otherwise provided to a member of the public.
 - b) If **sensitive biodiversity data** is excluded or redacted from a version of a **compliance report** published or otherwise provided to a member of the public, submit the full **compliance report** to the **department** within 5 **business days** of its publication on the **website** and notify the **department** in writing what exclusions and redactions have been made in the version published on the **website** or otherwise provided to a member of the public.
 - c) If **sensitive biodiversity data** is excluded or redacted from a version of a **shapefile** published or otherwise provided to a member of the public, submit the full **shapefile** to the **department** within 5 **business days** of its publication on the **website** and notify the **department** in writing what exclusions and redactions have been made in the version published on the **website** or otherwise provided to a member of the public.
- 21) The approval holder must notify the **department** electronically, within 5 **business days** of each date of publication that the **compliance report** has been published on the **website**. In this

notification, the approval holder must provide the **department** with the web address for where the **compliance report** and related **shapefile** are published on the **website**.

- 22) The approval holder must keep each **compliance report** and related **shapefile** published on the **website** from the first date which that **compliance report** must be published and until the expiry date of this approval.

Note: **Compliance reports** may be published on the **department's** website.

REPORTING NON-COMPLIANCE

- 23) The approval holder must notify the **department** electronically, within 2 **business days** of becoming aware of any **incident**. The approval holder must specify in each notification:
- a) any condition or commitment made in a **plan** which has not been, or may have not been, complied with,
 - b) a short description of the **incident**, and
 - c) the location (if applicable, including co-ordinates), date and time of the **incident**.
- 24) The approval holder must provide to the **department** in writing, within 12 **business days** of becoming aware of an **incident**, the details of that **incident**. The approval holder must specify:
- a) all corrective measures and investigations which the approval holder has already taken in respect of the **incident**,
 - b) the potential impacts of the **incident**,
 - c) the method and timing of any corrective measures that the approval holder proposes to undertake to address the **incident**, and
 - d) any variation of these conditions or revision of a **plan** that will be required to prevent recurrence of the **incident** and/or to address its consequences.

INDEPENDENT AUDIT

- 25) The approval holder must ensure that an **independent audit** of compliance with the conditions is conducted for every **audit period**.
- 26) The approval holder must submit details of the proposed **independent auditor** and their qualifications to the **department** within 10 **business days** following the end of each **audit period**.
- 27) The approval holder must ensure the scope of each **independent audit** is sufficient to determine the compliance status for each condition of approval, and each commitment made in each **plan**.
- 28) The approval holder must ensure the criteria for each **independent audit** and the undertaking of each **independent audit** are consistent with the **Independent Audit and Audit Report Guidelines**.

- 29) The approval holder must submit an **audit report** to the **department** for written agreement from the **department** within 3 months following the end of each **audit period**, or as otherwise directed by the **Minister** in writing.
- 30) The approval holder must ensure each **audit report** is completed to the satisfaction of the **Minister** and is consistent with the **Independent Audit and Audit Report Guidelines** to the extent that the **Independent Audit and Audit Report Guidelines** are consistent with these conditions.
- 31) The approval holder must publish each **audit report** on the **website**, in a format that is easily accessible and downloadable, within 10 **business days** of the date the **department** agrees to that **audit report** in writing.
- 32) The approval holder must notify the **department** within 5 **business days** of the date the **audit report** is published on the **website**. In this notification, the approval holder must provide the **department** with the web address for where the **audit report** is published on the **website**.
- 33) The approval holder must keep each **audit report** published on the **website** from the first date which that **audit report** must be published and until the expiry date of this approval.

COMPLETION OF THE ACTION

- 34) Within 20 **business days** after the **completion of the Action**, and, in any event, at least 20 **business days** prior to the expiry date of this approval, the approval holder must notify the **department** electronically of the date of **completion of the Action** and provide **completion data**. The approval holder must submit any spatial data that comprises **completion data** as a **shapefile**.
- 35) The approval holder must notify the **department** electronically at least 60, but not more than 70, **business days** prior to the expiry date of this approval, that the approval is due to expire.

Note: Section 145C of the EPBC Act entitles the approval holder to request an extension to the period of effect of this approval.

Part C – Definitions

Acacia aristulata means the EPBC Act listed threatened species Watheroo Wattle (***Acacia aristulata***).

Action area means the location of the Action, represented in Attachment A by the zone enclosed by the red line designated 'North Kiaka Development Envelope'.

Annual Compliance Report period or **ACR period** means each subsequent 12-month period following the date of this approval decision until the expiry date of this approval, unless otherwise specified in writing by the **Minister**.

Audit period means each subsequent three-year period following the **commencement of the Action** until the expiry date of this approval unless otherwise specified in writing by the **Minister**.

Audit report means a written report of an **independent audit**.

Baseline population means the number of individuals recorded on each **offset site**, as specified in table 2 of the **OMP**.

Biodiversity data means 'biodiversity data' as described in the *Policy on Accessing and Sharing Biodiversity Data*, Commonwealth of Australia 2024.

Business day means a day that is not a Saturday, a Sunday, or a public holiday in Western Australia.

Carnaby's Black Cockatoo or **CBC** means the EPBC Act listed threatened species Carnaby's Black Cockatoo (*Zanda latirostris* listed as *Calyptorhynchus latirostris*).

Carnaby's Black Cockatoo foraging habitat means any area which provides foraging habitat for **CBC**. The location of **CBC** foraging habitat identified in relation to the **Action Area** and **Offset sites** at the time of this approval decision is represented in Attachment B by the zones shaded light cyan, light blue, blue, purple, light purple and pink, respectively designated as '0', '1', '2', '3', '4', '5', '6' and '7'.

Cairn Hill North means the areas represented at Attachment B by the zone enclosed by the purple line designated 'Cairn Hill North Boundary'.

Cairn Hill Nature Reserve means the area represented at Attachment B by the grey-hatched area designated as 'North Kiaka Offset (BC and TEC)' zone where enclosed by the orange line designated 'Cairn Hill Reserve Boundary'.

Clear, cleared or clearing means the cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ringbarking, uprooting, or burning of vegetation and/or **protected matter** habitat.

Commence the Action or **commences the Action** means the first instance of any on-site **clearing, construction** or other physical activity associated with the Action, but does not include minor physical disturbance necessary to:

- a) Undertake pre-clearance surveys or monitoring programs.
- b) Install signage and/or temporary fencing to prevent unapproved use of the **Action area**, so long as the signage and/or temporary fencing is located where it does not **harm** any **protected matter**.
- c) Protect environmental and property assets from fire, weeds, and feral animals, including use of existing surface access tracks.

- d) Install temporary site facilities for persons undertaking pre-commencement activities so long as these facilities are located where they do not **harm any protected matter**.

Commencement of the Action means the date on which the approval holder **commences the Action**.

Completion data means an environmental report and spatial data clearly detailing how the conditions of this approval have been met.

Completion of the Action means the date on which all activities associated with the approved Action, other than those which provide compensation for the impacts of the Action, have permanently ceased and/or been completed.

Compliance records means all documentation or other material in whatever form required to demonstrate compliance with these conditions of approval (including compliance with commitments made in **plans**) in the approval holder's possession, or that are within the approval holder's power to obtain lawfully.

Compliance report means a written report of compliance with, and fulfilment of, these conditions (including compliance with commitments made in **plans**).

Construction/construct means:

- a) the erection of a building or structure that is, or is to be, fixed to the ground and wholly or partially fabricated on-site,
- b) the alteration, maintenance, repair or demolition of any building or structure,
- c) any work which involves breaking of the ground (including pile driving) or bulk earthworks,
- d) the laying of pipes and other prefabricated materials in the ground, and
- e) any associated excavation work.

Construction does not include the installation of temporary fences or signage or **exploration**.

Daviesia dielsii means the EPBC Act listed threatened species Diels' Daviesia (***Daviesia dielsii***).

DBCA means the Department of the Public Service of Western Australia responsible for the administration of the *Biodiversity Conservation Act 2016* and the *Conservation and Land Management Act 1984* which at the time of writing is the Department of Biodiversity, Conservation and Attractions (**DBCA**).

Department means the Australian Government agency responsible for administering the EPBC Act.

Environmental Management Plan or **EMP** means the document titled 'Environmental Management Plan', Revision 0, S. Speak, B. Neville, March 2023 or the latest subsequent version.

EPBC Act means the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).

Habitat quality means a measure of the overall value of a site and its capacity to support **protected matters**, with respect to site condition, site context and species stocking rate and/or composition, as determined in accordance with Attachment C, or other equivalent habitat scoring tool developed by an **independent suitably qualified ecologist**.

Harm means to cause any measurable direct or indirect disturbance or deleterious change as a result of any activity associated with the Action.

Incident means any:

- a) event which has the potential to, or does, **harm any protected matter**,
- b) potential non-compliance with these conditions, including the administrative requirements,
- c) actual non-compliance with these conditions, including the administrative requirements,
- d) potential non-compliance with one or more commitment made in a **plan**, and/or
- e) actual non-compliance with one or more commitment made in a **plan**.

Independent audit means an audit, conducted by an **independent auditor**, of compliance with and fulfilment of these conditions and the commitments made in **plans**, objectively evaluated against the audit criteria developed by the **independent auditor**, in accordance with the **Independent Audit and Audit Report Guidelines** to the extent that the **Independent Audit and Audit Report Guidelines** are consistent with these conditions.

Independent Audit and Audit Report Guidelines means the *Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines*, Commonwealth of Australia 2019.

Independent auditor means a person, or firm, who:

- a) does not have any individual, financial*, employment* or family affiliation or any conflicting interests with the Action, the approval holder or the approval holder's staff, representatives, or associated persons,
- b) has demonstrated experience in undertaking government-regulated environmental compliance audits, and
- c) holds relevant professional qualifications and accreditations.

*Other than for the purpose of undertaking the role for which the person, or firm, is required.

Minister means the Australian Government Minister administering the **EPBC Act**, including any delegate thereof.

Monitoring data means the data required to be recorded under the conditions of this approval, including **sensitive biodiversity data**.

Offset Management Plan or **OMP** means the document titled *Offset Management Plan*, version C, B. Neville, May 2025 or subsequent versions.

Offset sites means **Cairn Hill North** and **Cairn Hill Nature Reserve**.

Plan means any action management plan or strategy that the approval holder is required by these conditions to implement.

Protected matter means a matter protected under a controlling provision in Part 3 of the **EPBC Act** for which this approval has effect.

Independent suitably qualified ecologist means a person who has relevant professional qualifications and:

- does not have any individual, financial*, employment* or family affiliation or any conflicting interests with the Action, the approval holder or the approval holder's staff, representatives, or associated persons
- at least 3 years of work experience writing and implementing management plans for the habitat of **protected matters**,
- has implemented and reported on management plans for the habitat of **protected matters**, and can demonstrate the implementation of those plans achieved the desired **habitat quality** for habitat of **protected matters**, and
- can give authoritative assessment and advice on the impact of proposed actions and the design of more sustainable practices, this includes for the purposes of offset management to improve the **habitat quality** of the habitat of **protected matters** using relevant protocols, standards, methods and/or literature.

*Other than for the purpose of undertaking the role for which the person, is required.

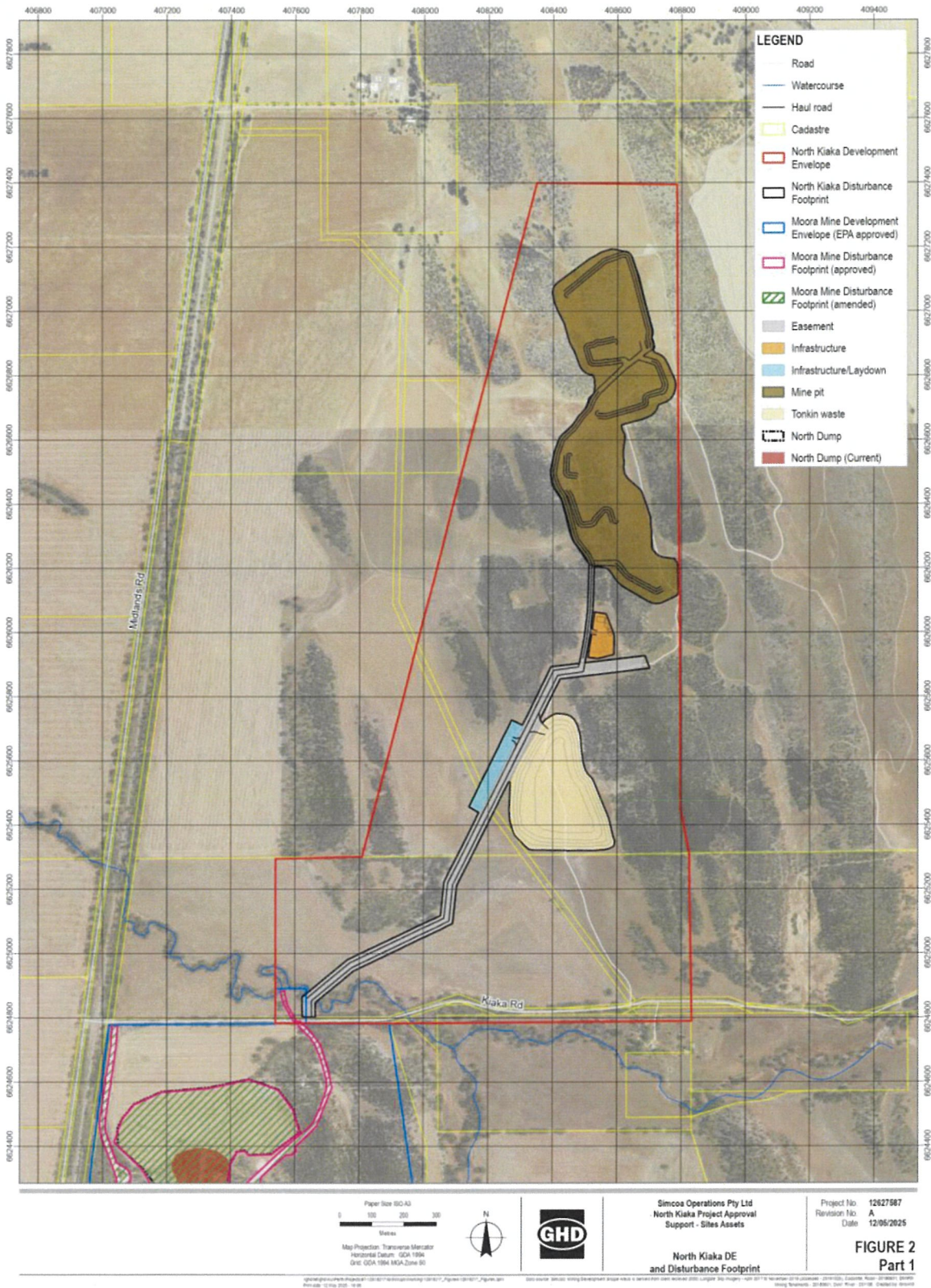
Sensitive biodiversity data means **biodiversity data** which, if released, published or otherwise exposed, may result in **harm** to the relevant **protected matter** as a result of the intentional or unintentional misuse of that **biodiversity data**.

Website means a set of related web pages located under a single domain name attributed to the approval holder and available to the public.

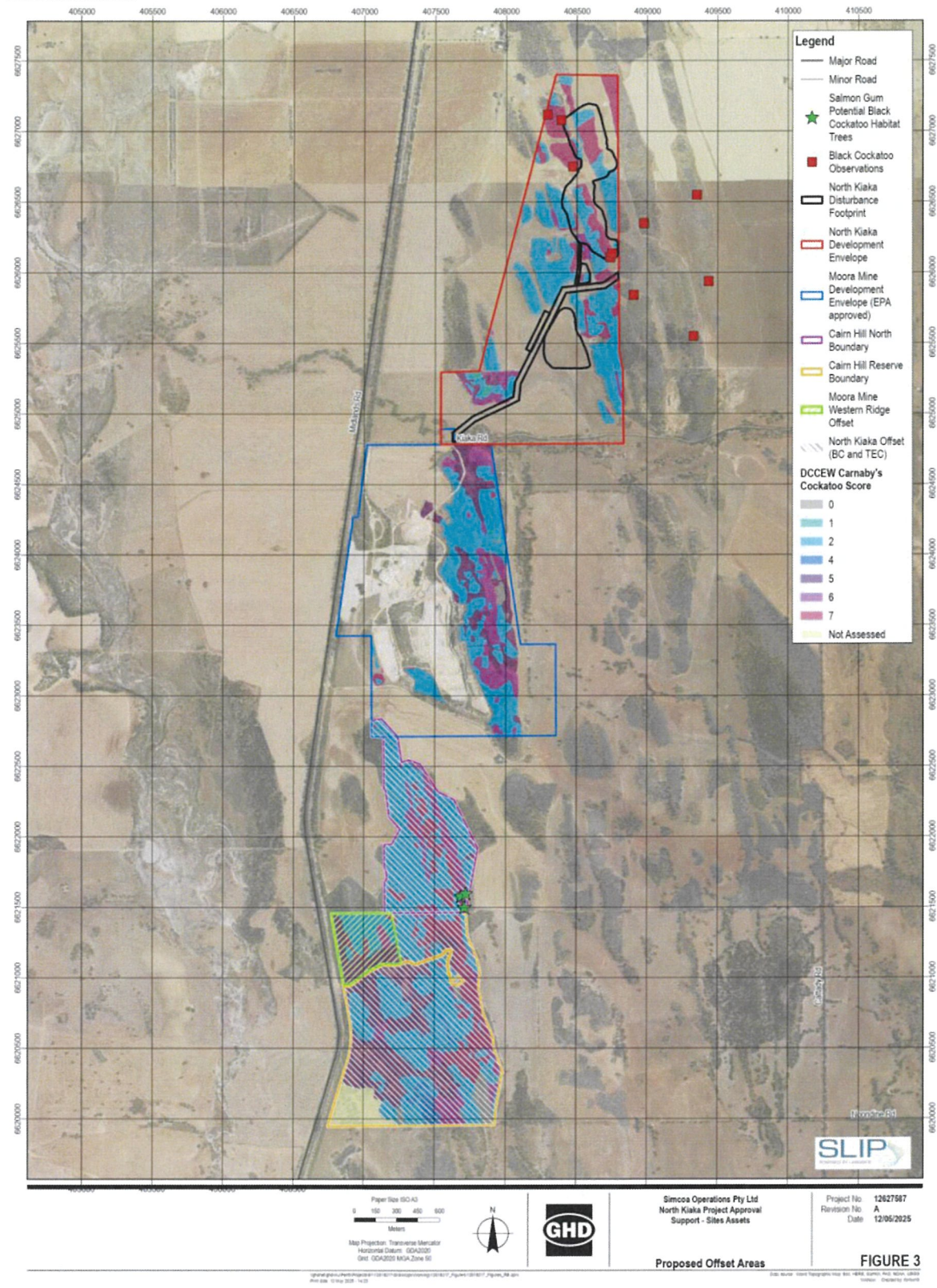
Attachments

- A: North Kiaka Development Envelope
- B: Offset Areas
- C: Habitat quality scoring

Attachment A: North Kiaka Development Envelope and disturbance footprint



Attachment B: Offset Areas





Attachment C: Habitat quality scoring, DCCEEW, 2025

Indicator	Score	Detail		Offset quality
Site Condition				
		Foraging value	Details	
Vegetation condition and structure. Habitat features	7	Very High	Carnaby's Black Cockatoo Native kwongan heath and shrubland (>30% projected foliage cover), banksia and eucalypt woodlands with >50% projected foliage cover. Low percentage (< 5%) of tree deaths.	
	6	High	Carnaby's Black Cockatoo Native kwongan heath and shrubland (>25% projected foliage cover), banksia and eucalypt woodlands with >40% projected foliage cover. Low percentage (< 10%) of tree deaths.	
			Carnaby's Black Cockatoo Native kwongan heath and shrubland (>20% projected foliage cover), banksia and eucalypt woodlands with 30-40% projected foliage cover; OR > 60% projected foliage cover but veg. condition reduced due to tree deaths (up to 20%).	
	4	Moderate	Carnaby's Black Cockatoo Native kwongan heath and shrubland, banksia or eucalypt woodlands with 20-30% projected foliage cover. Moderate percentage of tree deaths (30-40%).	
	3	Low to moderate	Carnaby's Black Cockatoo Native kwongan heath and shrubland, banksia or eucalypt woodlands with 10-20% projected foliage cover.	
	2	Low	Carnaby's Black Cockatoo Native kwongan heath and shrubland, banksia and eucalypt woodlands with <10% projected foliage cover; OR Paddocks and/or urban areas with scattered foraging trees such as banksias, marri.	
	1	Negligible to low	All species Scattered specimens of known food plants but projected foliage cover of these is <2%. May include: paddocks or urban areas with scattered foraging trees.	
Vegetation	0	None	All species	

condition and structure. Habitat features		No Proteaceae, eucalypts or other potential sources of food. May include bare ground or developed sites devoid of vegetation (e.g. infrastructure, roads, gravel pits).	
Totals			

Site Context				
Proximity of the site in relation to other habitat.	3	Site is within 6km of known breeding site.	or	Site is within 12km of other foraging resources with site condition of at least 3.
	2	Site is within 12km of known breeding site.	or	Site is within 15km of other foraging resources with site condition of at least 4.
	1	Site is within 15km of known breeding site.	or	Site is between 15km and 20km of other foraging resources with site condition of at least 5.
	0	Site is further than 15km from known breeding site.	or	Site is further than 20km from other foraging resources.
Totals				

Final Totals					
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Appendix B Compliance with Conditions of EPBC 2021/9089

Table B1: Compliance with Conditions of EPBC 2021/9089

Condition Number / Reference	Condition	Is the Project Compliant with this Condition?	Evidence/Comments
1	The approval holder must not: a) Clear outside of the Action area. b) Construct outside of the Action area.	Not applicable	The Project did not commence during the reporting period. There was no clearing or construction works within the Project area.
2	The approval holder must not clear more than: a) 15.58 hectares (ha) of Carnaby's Black Cockatoo foraging habitat. b) 17 individuals of <i>Acacia aristulata</i> . c) 15 individuals of <i>Daviesia dielsii</i> .	Not applicable	The Project did not commence during the reporting period. There was no clearing within the Project area.
3	To avoid and mitigate harm to Carnaby's Black Cockatoos, <i>Acacia aristulata</i> and <i>Daviesia dielsii</i> as a result of the Action, the approval holder must commence implementing the Environmental Management Plan (EMP) no later than the commencement of the Action and continue to implement the EMP until the expiry date of this approval.	Not applicable	The Project did not commence during the reporting period. Simcoa were not required to implement the EMP.
4	To compensate for the residual significant impacts of the Action on Carnaby's Black Cockatoo, <i>Acacia aristulata</i> and <i>Daviesia dielsii</i> , the approval holder must commence implementation of the Offset Management Plan (OMP) no later than the commencement of the Action and continue to implement the OMP at least until the expiry date of this approval. The approval holder must achieve the following environmental outcomes: a) the habitat quality of at least 124.67 ha of Carnaby's Black Cockatoo foraging habitat at Cairn Hill Nature Reserve is a 7 out of 10 at the commencement of the Action and is maintained at a 7 out of 10 habitat quality at least until the expiry date of this approval. b) the habitat quality of at least 4.33 ha of Carnaby's Black Cockatoo foraging habitat at Cairn Hill North is a 7 out of 10 at the commencement of the Action and is maintained at a 7 out of 10 habitat quality at least until the expiry date of this approval. c) the baseline population of <i>Acacia aristulata</i> and <i>Daviesia dielsii</i> at the Offset sites are maintained or exceeded for the life of this approval.	Not applicable	The Project did not commence during the reporting period. Simcoa were not required to implement the OMP.
5	The approval holder must, within 5 business days of commencing implementation of the OMP, notify the department of the date on which implementation of the OMP commenced.	Not applicable	The Project did not commence during the reporting period. Simcoa were not required to implement the OMP and thus were not required to notify the department of the date on which implementation of the OMP commenced.
6	The approval holder must ensure Cairn Hill North becomes a Class A Nature Reserve vested with the Conservation and Parks Commission and managed by DBCA, 5 years after the date of approval.	Compliant	SIMCOA will ensure Cairn Hill North becomes a Class A Nature Reserve vested with the Conservation and Parks Commission and managed by DBCA, within 5 years after the date of approval (i.e., by 17 September 2020). During the reporting period SIMCOA undertook several actions at Cairn Hill North to progress this requirement: - Fenced the offset area. - Prepared a terms sheet for parties affected by Cairn Hill North forming a Class A Nature Reserve - Met with the Department of Mines, Petroleum and Exploration (DMPE) about relinquishing (surrendering) part of the mining tenement which overlaps Cairn Hill North. - Consulted with the DBCA regarding the offset areas.
7	The approval holder must manage Cairn Hill North in accordance with the OMP until the DBCA assumes management of Cairn Hill North.	Not applicable	The draft OMP is in the process of being finalised and being lodged with the DWER. Once approved by DWER it will be implemented.
8	The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days following commencement of the Action.	Not applicable	The Project did not commence during the reporting period.
9	The approval holder must not commence the Action later than 5 years the date of this approval decision.	Not applicable	The approval decision was 17 September 2025, therefore five (5) years post the date of approval is 17 September 2030. The Project has not yet commenced. Simcoa still has time to commence the Project prior to this time limit coming into effect.

Condition Number / Reference	Condition	Is the Project Compliant with this Condition?	Evidence/Comments
10	The approval holder must maintain accurate and complete compliance records and document the procedure for recording and storing compliance records.	Compliant	Accurate and complete compliance records will be recorded, maintained and stored as each ACR is prepared. Each ACR will report which records are recorded and maintained to achieve compliance with this EPBC approval. SIMCOA will use their document control system (B3.3) to record and store ACRs and accompanying documents.
11	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request. <i>Note: Compliance records may be subject to audit by the department, or by an independent auditor in accordance with section 458 of the EPBC Act, and/or be used to verify compliance with the conditions. Summaries of the results of an audit may be published on the department's website or through the general media.</i>	Not applicable	During the reporting period the department did not request any electronic copies of compliance records.
12	The approval holder must ensure that any monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guidelines for biological survey and mapped data, Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing.	Not applicable	No monitoring data, surveys, maps or other spatial and metadata was required (under the conditions of this approval) to be prepared during the reporting period.
13	The approval holder must ensure that any monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guide to providing maps and boundary data for EPBC Act projects, Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.	Not applicable	No monitoring data, surveys, maps or other spatial and metadata was required (under the conditions of this approval) to be prepared during the reporting period.
14	The approval holder must ensure that any assessment of habitat quality for Carnaby's Black Cockatoo foraging habitat is conducted by an independent suitably qualified ecologist.	Not applicable	No assessment of habitat quality for Carnaby's Black Cockatoo foraging habitat was undertaken during the reporting period.
15	The approval holder must submit all monitoring data, surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 20 business days of the next anniversary of the date of this approval decision except where otherwise specified in a plan.	Not applicable	No monitoring data, surveys, maps, other spatial and metadata and species occurrence record data (sightings and evidence of presence) was required to be lodged to the department during the reporting period.
16	The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period).	Compliant	This ACR is the first compliance report to be prepared for this EPBC approval. The ACR period is 17 September 2025 to 16 September 2026.
17	The approval holder must ensure each compliance report includes: a) accurate and complete details of compliance and any non-compliance with: i) each condition attached to this approval decision, and ii) all commitments made in each plan, b) a schedule of all plans in effect in relation to these conditions during the ACR period, and c) accurate and complete details of how each plan was implemented during the ACR period, and d) if any incident occurred, accurate and complete details of each incident.	Compliant	This ACR includes: a) accurate and complete details of compliance and any non-compliance with: i) each condition attached to this approval decision – refer to Appendix C. ii) all commitments made in each plan – Not applicable (plans not yet required to be implemented). b) a schedule of all plans in effect in relation to these conditions during the ACR period – Not applicable (plans not yet required to be implemented). c) accurate and complete details of how each plan was implemented during the ACR period – Not applicable (plans not yet required to be implemented). d) if any incident occurred, accurate and complete details of each incident – Not applicable (no incidents during the reporting period).
18	The approval holder must ensure each compliance report is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.	Compliant	This ACR has been prepared in accordance with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.
19	The approval holder must, within 20 business days following the end of each ACR period, in a format that is easily accessible and downloadable, publish on the website: a) each compliance report, and b) a shapefile showing all clearing of protected matters, and their habitat, undertaken within the ACR period.	Compliant	a) The 2026 ACR will be published on the Simcoa website within 20 business days following the end of each ACR period. b) No clearing was undertaken during the reporting period – No applicable.
20	The approval holder must: a) Exclude or redact sensitive biodiversity data from each compliance report and shapefile published on the website or otherwise provided to a member of the public. b) If sensitive biodiversity data is excluded or redacted from a version of a compliance report published or otherwise provided to a member of the public, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public. c) If sensitive biodiversity data is excluded or redacted from a version of a shapefile published or otherwise provided to a member of the public, submit the full shapefile to the department within 5 business days of its publication on	Not applicable	No sensitive biodiversity data has been excluded or redacted from the ACR.

Condition Number / Reference	Condition	Is the Project Compliant with this Condition?	Evidence/Comments
	the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.		
21	The approval holder must notify the department electronically, within 5 business days of each date of publication that the compliance report has been published on the website. In this notification, the approval holder must provide the department with the web address for where the compliance report and related shapefile are published on the website.	Compliant	Within 5 business days of the date of publication of the 2026 ACR on the Simcoa website, Simcoa will provide to the department the web address where the compliance report is posted. A related shapefile will not be published on the website as no clearing was undertaken during the reporting period.
22	The approval holder must keep each compliance report and related shapefile published on the website from the first date which that compliance report must be published and until the expiry date of this approval. <i>Note: Compliance reports may be published on the department's website.</i>	Compliant	Simcoa will maintain each ACR on the Simcoa website until the expiry date of this approval (i.e., 1 September 2057).
23	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident. The approval holder must specify in each notification: a) any condition or commitment made in a plan which has not been, or may have not been, complied with, b) a short description of the incident, and c) the location (if applicable, including co-ordinates), date and time of the incident.	Not applicable	No incidents occurred during the reporting period.
24	The approval holder must provide to the department in writing, within 12 business days of becoming aware of an incident, the details of that incident. The approval holder must specify: a) all corrective measures and investigations which the approval holder has already taken in respect of the incident, b) the potential impacts of the incident, c) the method and timing of any corrective measures that the approval holder proposes to undertake to address the incident, and d) any variation of these conditions or revision of a plan that will be required to prevent recurrence of the incident and/or to address its consequences.	Not applicable	No incidents occurred during the reporting period.
25	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period.	Not applicable	An independent audit was not due to be undertaken during the reporting period. The independent audit period is each subsequent three-year period following the commencement of the Action (i.e., 17 September 2025 to 16 September 2028). The audit period has not yet ended. The independent audit will be undertaken after 16 September 2028.
26	The approval holder must submit details of the proposed independent auditor and their qualifications to the department within 10 business days following the end of each audit period.	Not applicable	An independent audit was not due to be undertaken during the reporting period. The audit period has not yet ended. The independent audit will be undertaken after 16 September 2028.
27	The approval holder must ensure the scope of each independent audit is sufficient to determine the compliance status for each condition of approval, and each commitment made in each plan.	Not applicable	An independent audit was not undertaken during the reporting period, as it was not due. It is due after 16 September 2028.
28	The approval holder must ensure the criteria for each independent audit and the undertaking of each independent audit are consistent with the Independent Audit and Audit Report Guidelines.	Not applicable	An independent audit was not undertaken during the reporting period, as it was not due. It is due after 16 September 2028.
29	The approval holder must submit an audit report to the department for written agreement from the department within 3 months following the end of each audit period, or as otherwise directed by the Minister in writing.	Not applicable	An independent audit was not undertaken during the reporting period, as it was not due. It is due after 16 September 2028.
30	The approval holder must ensure each audit report is completed to the satisfaction of the Minister and is consistent with the Independent Audit and Audit Report Guidelines to the extent that the Independent Audit and Audit Report Guidelines are consistent with these conditions.	Not applicable	An independent audit was not undertaken during the reporting period, as it was not due. It is due after 16 September 2028.
31	The approval holder must publish each audit report on the website, in a format that is easily accessible and downloadable, within 10 business days of the date the department agrees to that audit report in writing.	Not applicable	An independent audit was not undertaken during the reporting period, as it was not due. It is due after 16 September 2028.
32	The approval holder must notify the department within 5 business days of the date the audit report is published on the website. In this notification, the approval holder must provide the department with the web address for where the audit report is published on the website.	Not applicable	An independent audit was not undertaken during the reporting period, as it was not due. It is due after 16 September 2028.
33	The approval holder must keep each audit report published on the website from the first date which that audit report must be published and until the expiry date of this approval.	Not applicable	An independent audit was not undertaken during the reporting period, as it was not due. It is due after 16 September 2028.
34	Within 20 business days after the completion of the Action, and, in any event, at least 20 business days prior to the expiry date of this approval, the approval holder must notify the department electronically of the date of completion	Not applicable	The Project has not yet been completed.

Condition Number / Reference	Condition	Is the Project Compliant with this Condition?	Evidence/Comments
of the Action and provide completion data. The approval holder must submit any spatial data that comprises completion data as a shapefile.			
35	The approval holder must notify the department electronically at least 60, but not more than 70, business days prior to the expiry date of this approval, that the approval is due to expire.	Not applicable	This approval has not yet expired. It is due to expire on 1 September 2057.

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