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Date
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Alcoa of Australia Limited – WA Operations

2023 – 2027 Mining and Management Program - Compliance Assessment Report 2024

For the period 20th December 2023 to 31st May 2024



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Alcoa of Australia Limited –WA Operations


2023 – 2027 Mining and Management Program - Compliance Assessment Report 2024

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Alcoa Director Endorsement	
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Endorsed by	Tanya Simmonds
Position	Interim Vice President Operations - Australia
Signature	

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Terminology

Acronym	Definition
Alcoa	Alcoa of Australia Pty Ltd
CAP	Compliance Assessment Plan
CEO	Chief Executive Officer of DWER
CHP	Cultural Heritage Plan
DBCA	Department of Biodiversity, Conservation and Attractions
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DEMIRS	Department of Energy, Mines, Industry Regulation and Safety
DWER	Department of Water and Environmental Regulation
EPA	Environmental Protection Authority
EP Act	Environmental Protection Act 1986
FCA	Forest Clearing Advice area
GDP	Ground Disturbance Permit
ITAG	Independent Technical Advisory Group
JTSI	Jobs, Tourism, Science and Industry
ML1SA	Mineral Lease 1SA
MMP	2023-2027 Mining and Management Programme
MMPLG	Mining and Management Program Liaison Group
MOG	Mine Operations Group
OEPA	Office of the Environmental Protection Authority
Ramboll	Ramboll Australia Pty Ltd
RFI	Request For Information
WRMP	Water Resources Management Plan

1. Introduction

1.1 Project Background

Alcoa of Australia Limited (Alcoa) mines bauxite and processes it into alumina and further into aluminium. Alcoa’s operations in Western Australia include two (2) mine sites and three (3) refineries.

On 20 December 2023, Alcoa received approval for the 2023 - 2027 Mining and Management Program (2023-2027 MMP Approval, ref: 60- 076783), which covers Alcoa’s proposed exploration and mining operations for Huntly and Willowdale mines within ML1SA (Figure 1 - Figure 3). The approval, issued in accordance with the *Alumina Refinery (Wagerup) Agreement and Acts Amendment Act 1978* and commitment 2 of schedule 2 of Ministerial Statement 728, contains conditions designed to drive risk management associated with operating in the Jarrah Forest, contemporise approval conditions, improve transparency of operational performance, and ensure establishment of management processes to meet Mining and Management Program Liaison Group (MMPLG) and the Minister for State Development expectations.

The MMP approval area excludes mine development activities associated with Myara North or Holyoake mining regions (the Huntly-Pinjarra Revised Proposal) that are currently under consideration by the Environmental Protection Authority (EPA) and the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

As required under Condition 27 of the 2023-2027 MMP Approval, Alcoa has sought and obtained the services of an independent qualified person to monitor and report compliance against the relevant conditions of the approval, as referenced within the condition which has been provided in Table 1 below:

Table 1 Condition 27 – Independent qualified person

Name	Address
Ramboll Australia Pty Ltd	L7, 41 St Georges Terrace, Perth, WA, 6000.

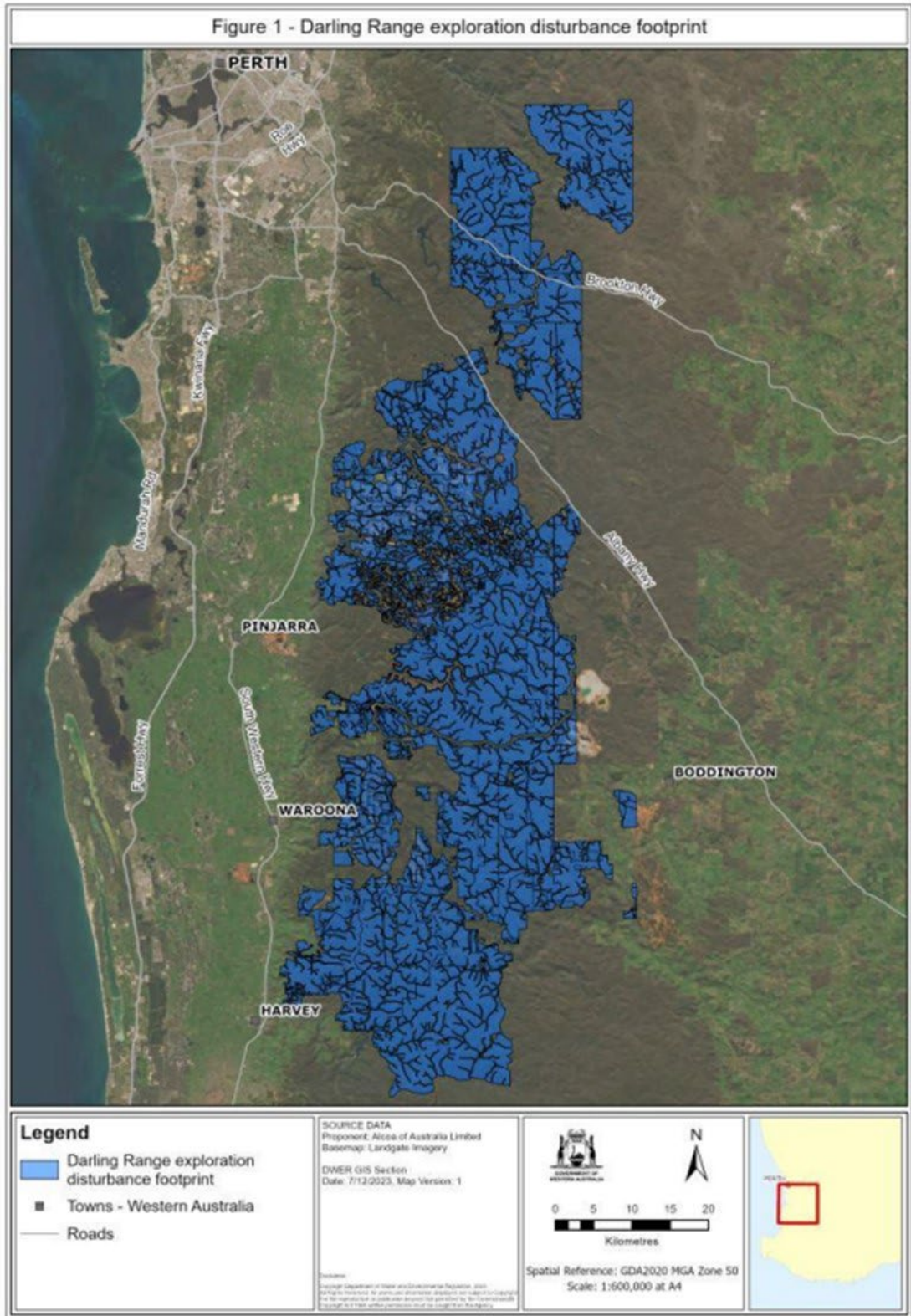


Figure 1 Darling Range Exploration Disturbance Footprint

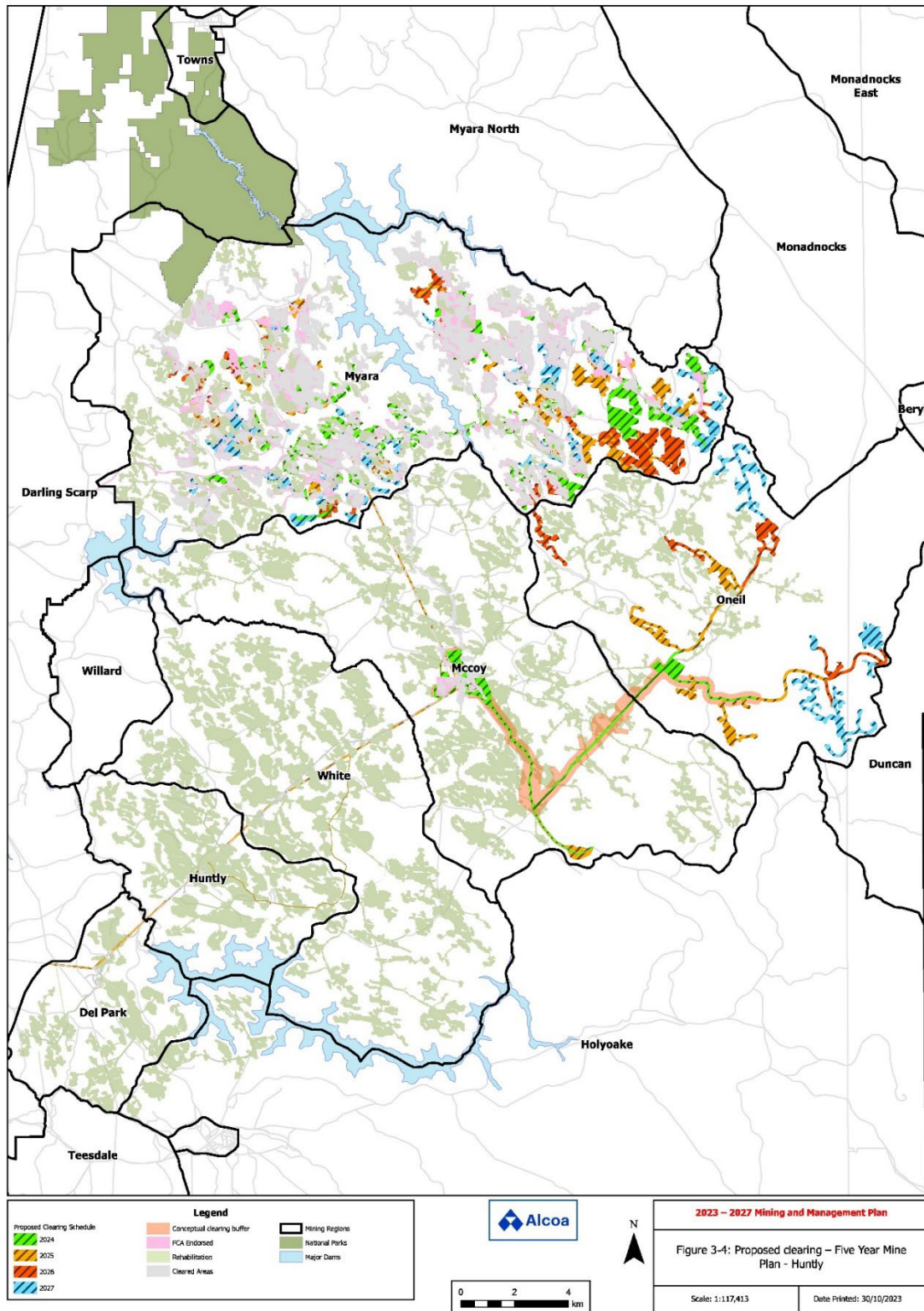


Figure 2 Huntly Mine MMP 5-Year Proposed Clearing Footprint

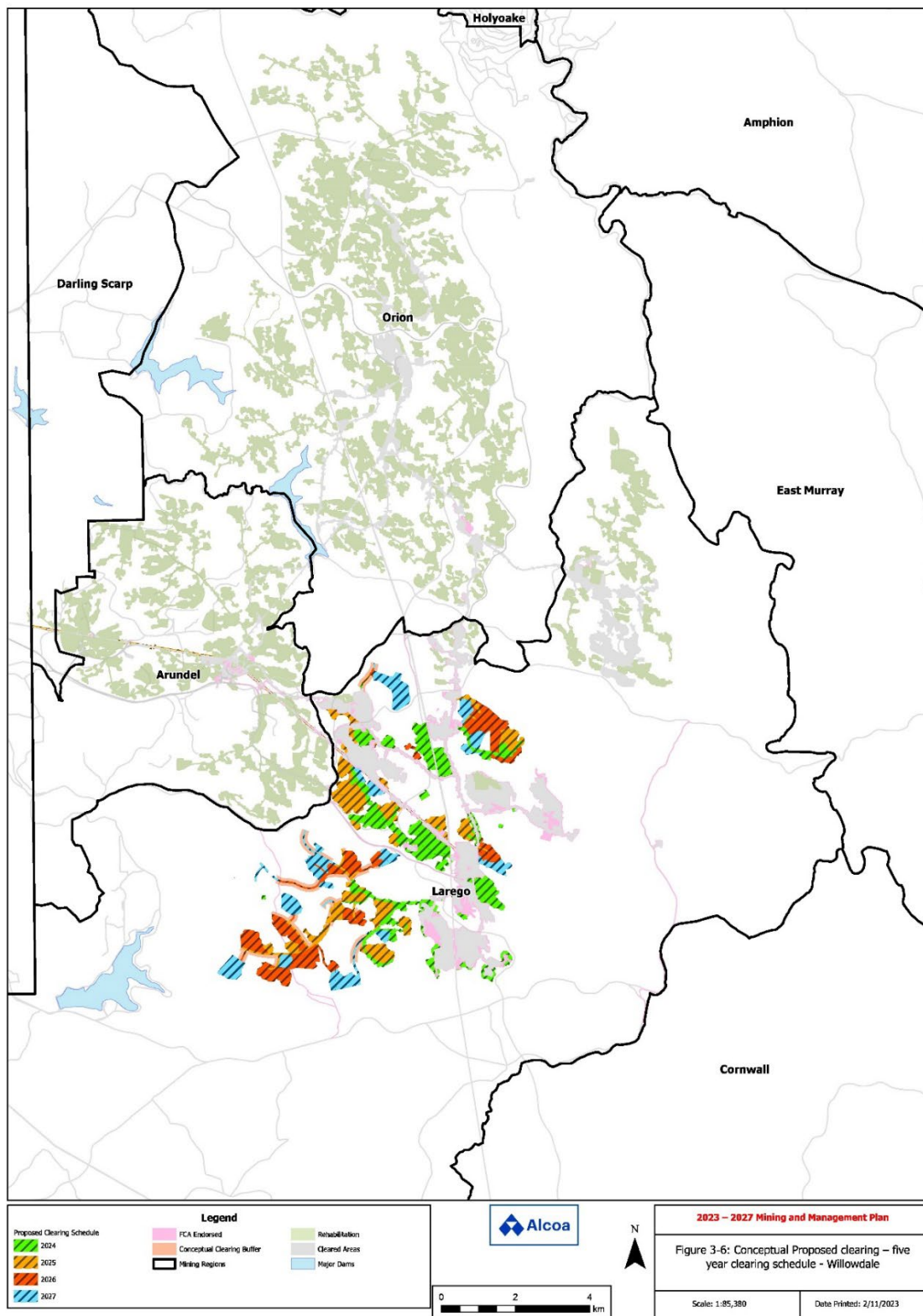


Figure 3 Willowdale Mine MMP 5-Year Proposed Clearing Footprint

1.2 Objectives and scope of work

Condition 32 requires Alcoa to provide a Compliance Assessment Report (CAR) to the State Development Minister on an annual basis. The first CAR is due within six (6) months of the date of the MMP approval and subsequent reports shall be provided annually from that date (Condition 33).

This CAR has been prepared to meet the requirements imposed on Alcoa by the Minister for State Development, through Ministerial Approval (2023-2027 MMP Approval, ref: 60-076783) conditions for Alcoa's 2023-2027 Mining and Management Program (MMP).

The minimum content of the CAR is defined in Condition 35 of the Approval Conditions:

'Each annual Compliance Assessment Report must:

(a) state whether each condition has been complied with, including:

- i. the limitations in conditions 5 and 9;*
- ii. requirements to implement the content of Drainage Control Management Plans or an approved management plan;*
- iii. monitoring requirements;*
- iv. implementation of contingency measures;*
- v. requirements to implement adaptive management; and*
- vi. reporting requirements;*

(b) include the results of any monitoring (inclusive of any raw data) that has been required under these conditions in order to demonstrate that the conditions have been met;

(c) provide evidence to substantiate statements of compliance, or details of where there has been a non-compliance;

(d) describe progress and status of any consultation undertaken to review and update management plans;

(e) include the corrective, remedial and preventative actions taken in response to any potential non-compliance;

(f) be provided in a form suitable for publication on Alcoa's website; and

(g) be prepared and published consistent with the latest version of the Compliance Assessment Plan required by condition 36 which the State Development Minister has approved in writing satisfies the relevant requirements. '

This CAR has been prepared by Ramboll as the independent compliance monitor in accordance with OEPA's *Post Assessment Guideline for Preparing a Compliance Assessment Report* and provides the Compliance Status of the audit elements and a summary of the identified non-compliances and potential non-compliances within the reporting period (20 Dec 2023 – 31 May 2024).

This CAR is based on the Compliance Assessment Plan (CAP) that was developed in response to Conditions 36 and 37 of the MMP approval conditions. The CAP was submitted to the Minister for State Development on the 18th April 2024. The CAP includes the proposed structure and format of this CAR, including the content of both Appendix A and Appendix B.

At the time of writing this CAR, the CAP had yet to be approved by the State Development Minister.

2. Methodology and Approach

2.1 Summary of Compliance Activities

Activities undertaken by Alcoa to meet the MMP approval conditions are summarised below:

- Preparation of Compliance Assessment Plan (CAP).
- Development of this Compliance Assessment Report (CAR).
- Implementing a mine planning and ground disturbance process:
 - Including e.g., Ground Disturbance Permits (GDP) and Ground Disturbance Register.
- Implementing post-clearance validation and reconciliations processes:
 - Including e.g., ArcGIS system.
- Demarcation of black cockatoo nesting trees and associated buffer zones.
- Implementing processes to categorise and manage sump and containment control structures that have the potential to contain environmentally hazardous material. The environmentally hazardous materials sampling program will, at the minimum, include hydrocarbons, PFAS compounds and ethylene glycol.
- Implementing drainage control and preparation and implementation of relevant Drainage Control Management Plans (DCMP).
- Implementing Land Stabilisation Plan and Stabilisation Schedule.
- Flora and fauna surveys.
- Review and update of the Management Plans, and creation and update of the Management Plan Commitments Register.
- Undertaking consultation with the relevant Regulators and stakeholders required by the approval conditions in relation to the development and update of the respective Management Plans.
- Preparation of Full Mining Cycle and Cumulative Scale Catchment Scale Risk Assessment, for upcoming development and consultation with the Independent Technical Advisory Group (ITAG).
- Implementing to the extent practicable the:
 - Water Resources Management Plan.
 - Fauna Management Plan
 - Flora and Vegetation Management Plan
 - Recreational Trails and Facilities Management Plan
- Making information, as required by the MMP Approval, publicly available.

Please refer to the Compliance Monitoring Report in Appendix A and the detailed audit table in Appendix B for further details.

2.2 Compliance Status Criteria

The compliance status of each condition is assigned in accordance with EPA guidelines. The compliance status terms and their definitions are provided in Table 2.

Table 2 Compliance status terms and their definitions

Compliance Status Term	Definition	Guidance on Use
Compliant (C)	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	The term applies to audit elements with: <ul style="list-style-type: none"> ongoing requirements that have been met during the reporting period; and requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'Completed'
Completed (CLD)	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: <ul style="list-style-type: none"> audit elements have a finite period of application (e.g. construction activities, development of a document). the requirement has been satisfactorily completed; and the OEPA has provided written acceptance of 'Completed' status for the audit element.
Not required at this stage (NR)	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant (PNC)	Possible or likely failure to meet the requirements of the audit element.	This term may only be used where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred. Where this term is used, the proponent should advise when investigations will be finalized and provide follow up advice of the outcome.
Non-compliant (NC)	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element have not been met during the reporting period and its status is not 'Completed'.
In-Process (IP)	Where an audit element requires a management or monitoring plan be submitted to the OEPA or another government agency for approval that submission has been made or no further information or changes have been requested by the OEPA or the other government agency and assessment by the OEPA or other government agency for approval is still pending.	The term 'In process' must only be used for the purpose stated in the definition column. 'In process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires ongoing implementation throughout the life of the project (e.g. implementation of a management plan).

3. Project Implementation and Compliance Status

3.1 Summary of Implementation Status

The major implementation milestones of the MMP in the first six months since approval by the State Development Minister are summarised below:

- The justification for the mining contemplated by the MMP within the Serpentine Dam Catchment is required from a social and economic perspective, as required by Condition 3, was submitted to the Minister for State Development.
- Alcoa has demonstrated compliance with Condition 4 and 5 for the first six months of operation under the MMP.
- Effective implementation of the Management Plans provided to support the approval of the MMP has been demonstrated (Condition 13).
- Substantial progress in the development of the revised Management Plans required to be implemented during mining activities conducted under the requirements of the MMP has been made (Condition 17).
- The CAP has been prepared and submitted to the State Development Minister (Condition 36).
- Alcoa has engaged Ramboll as a qualified independent party to conduct the required monitoring (Conditions 27-28) and compliance reporting (Condition 32).

3.2 Condition Compliance Status Summary

Alcoa's compliance against each of the conditions set in the Ministerial Approval of their MMP is presented in the Audit Table in Appendix B. The Audit Table has been formulated in accordance with the OEPA's *Post Assessment Guideline for Preparing an Audit Table* and is currently pending approval by the State Development Minister as part of Alcoa's MMP CAP.

A summary of the assessed conditions and their compliance status is presented below (Table 3). For a full assessment of compliance, please refer to Appendix B.

Table 3 Compliance status summary

Condition number	Compliance status	Condition number	Compliance status
Condition 1	-	Condition 21	NR
Condition 2	C	Condition 22	C
Condition 3	IP	Condition 23	NR
Condition 4	C	Condition 24	NR
Condition 5	C	Condition 25	NR
Condition 6	C	Condition 26	NR
Condition 7	C	Condition 27	C
Condition 8	C	Condition 28	C
Condition 9	C	Condition 29	C
Condition 10	NR	Condition 30	NR
Condition 11	C	Condition 31	NR
Condition 12	C	Condition 32	C
Condition 13	C	Condition 33	C
Condition 14	NR	Condition 34	C
Condition 15	NR	Condition 35	C
Condition 16	C	Condition 36	IP
Condition 17	NR	Condition 37	IP
Condition 18	NR	Condition 38	C
Condition 19	NR	Condition 39	NR
Condition 20	NR	Condition 40	NR

During the reporting period no potential non-compliances or actual non-compliances were identified (refer to details in Appendix B).

4. References

Alcoa of Australia Limited. 2024. Compliance Assessment plan (CAP).

Approved 2023-2027 Mining and Management Program: Huntly and Willowdale. Nov 2023.
Available: [2023-2027 Final MMP.pdf](#)

Ministerial Approval Conditions for the 2023-2027 Mining and Management Program. 20 Dec 2023. Available: [Ministerial Approval Conditions for the 2023-2027 Mining and Management Program.pdf](#)

Exemption Order. 2023. Environmental Protection – Darling Range Bauxite Mining Proposals.

OEPA. 2012. Post Assessment Guideline for Preparing a Compliance Assessment Report.
Available: <https://www.epa.wa.gov.au/preparing-compliance-assessment-report>

OEPA. 2012. Post Assessment Guideline for Preparing an Audit Table. Available:
<https://www.epa.wa.gov.au/sites/default/files/PAG1%20-%20Guideline%20for%20Preparing%20an%20Audit%20Table.pdf>

Appendix A

Compliance Monitoring Report – Condition 28

1. Compliance Monitoring Report

1.1 Monitoring Activities Undertaken

Monitoring required by MMP Condition 28 is summarised below. The monitoring summarised is that undertaken by Ramboll as the independent compliance monitor.

1.1.1 Independent compliance monitor

Monitoring is undertaken by Ramboll as the Independent Compliance Monitor for this MMP, including a requirement to monitor compliance with Conditions 5 and 9. To date, Alcoa has cleared 46.51ha of land and commenced clearing of 101.49ha of the allowable 800ha stipulated by Condition 9.

Monitoring of Condition 5 occurs utilising a documented monitoring procedure that is risk-based and scientifically robust. The monitoring approach is described below:

1.1.1.1 Acquisition and management of data

- Data is acquired from Alcoa on a weekly basis utilising a formal Request for Information (RFI).
- Data is provided utilising a secure file transfer system managed by a third party to retain independence.
- Data is reviewed and saved within Ramboll systems.

1.1.1.2 Evaluating compliance

Desktop

- Compliance is verified through both desktop checks and field verification. Ramboll has developed a Geographical Information System (GIS) mapping database which houses the data provided within the RFI. The basemap includes a variety of information (updated weekly) relevant to MMP Conditions 4 and 5.
- The basemap is updated each week with new data and reviewed to verify compliance with Condition 5 requirements.
- A review of Sentinel-2 satellite imagery to identify newly cleared areas is undertaken weekly.
- A review of completed Ground Disturbance Permits is undertaken.
- Review site turbidity registers to determine potential drainage incident occurrence.
- Develop a field plan based on data review and potential for the risk of environmental harm occurring and / or the risk of a non-compliance with a MMP condition occurring.

Field

The first site monitoring visit occurred on the 8th February 2024. During the months of February, March and April monitoring on site were conducted weekly. In May 2024 the monitoring was increased, and site monitoring visits were conducted three times per week. Site monitoring is increasing so that visits occur every weekday in June and daily, excluding public holidays, in July onwards. Both Huntly and Willowdale mining sites are being monitored. The completed site monitoring dates during the reporting period (20 December 2023 – 20 June 2024) are summarised in Table 4.

Table 4 Dates of on site monitoring at either Huntly or Willowdale during the reporting period 2023/2024

Month	Site monitoring dates
December	-
January	-
February	8 th , 15 th , 22 nd and 29 th
March	7 th , 14 th , 21 st , and 28 th
April	4 th , 11 th , 18 th and 26 th
May	2 nd , 7 th , 9 th , 14 th , 15 th , 16 th , 21 st , 22 nd , 23 rd , 28 th , 29 th and 30 th

Sites for field verification are chosen based on their risk profile, either environmental risk or risk of non-compliance with the MMP conditions. Sites that have the potential to cause environmental harm, for example due to low drainage control capacity, are visited more regularly than other sites with a lower risk profile.

Ramboll’s compliance monitoring procedure, which provides further detail on the monitoring process, has been included as Appendix D to this CAR. Ramboll has evaluated risk profiles at both sites based on the activities conducted on the site and the environmental characteristics of the corresponding site. Ramboll’s risk classification process is summarised in Table 5 and further in Appendix D. Site selection for field verification is conducted at the end of each week for the following week.

Findings are recorded on a Compliance Assessment worksheet, which is then aggregated and summarised for reporting. The worksheets from the monitoring undertaken during the reporting period, constituting the raw monitoring data, are included as Appendix E to this CAR.

Table 5 Huntly and Willowdale Risk Profile and Monitoring Frequency Justification

Alcoa Activity	Site / Environmental Characteristics									
	Prohibited Activity Areas	Restricted Activity Areas					Elevated Risk Conditions		Other Areas	
	Adjacent to FCAs	Within Reservoir Top Water Level 1km buffer	Within Serpentine Pipehead Dam Catchment	Within Reservoir Protection Zone + >16% gradient	Within Reservoir Protection Zone	Black Cockatoo Trees / Significant Trees within or adjacent to area	Ponding shallow groundwater present	When rainfall >20mm forecast or received	Elsewhere in s6 or MMP area	Recorded Incidents
Huntly										
Open areas with Drainage Storage Capacity < 50%	N/A	H	H	H	H	N/A	VH	VH	H	VH
Stabilisation / construction of drainage control	N/A	H	H	H	H	N/A	VH	VH	M	VH
New clearing	VH	M	M	M	M	VH	N/A	H	M	VH
Use / maintenance of existing mining infrastructure	N/A	M	M	M	M	M	H	H	L	VH
Rehabilitation (backfilling, shaping, topsoiling, ripping)	N/A	M	M	M	M	M	M	H	L	VH
Exploration	L	M	M	M	M	M	M	H	L	VH
Turbidity monitoring sensors	N/A	M	M	M	M	N/A	N/A	H	N/A	VH
Other disturbance (e.g. monitoring bore installation)	N/A	M	M	M	M	H	M	M	L	VH

Alcoa Activity	Site / Environmental Characteristics									
	Prohibited Activity Areas	Restricted Activity Areas					Elevated Risk Conditions		Other Areas	
	Adjacent to FCAs	Within Reservoir Top Water Level 1km buffer	Within Serpentine Pipehead Dam Catchment	Within Reservoir Protection Zone + >16% gradient	Within Reservoir Protection Zone	Black Cockatoo Trees / Significant Trees within or adjacent to area	Ponding shallow groundwater present	When rainfall > 20mm forecast or received	Elsewhere in s6 or MMP area	Recorded Incidents
Willowdale										
Open areas with Drainage Storage Capacity < 50%	N/A	H	N/A	H	H	N/A	VH	VH	H	VH
Stabilisation / construction of drainage control	N/A	H	N/A	H	H	N/A	VH	VH	M	VH
New clearing	VH	M	N/A	M	M	VH	N/A	H	M	VH
Use / maintenance of existing mining infrastructure	N/A	M	N/A	M	M	M	H	H	L	VH
Rehabilitation (backfilling, shaping, topsoiling, ripping)	N/A	M	N/A	M	M	M	M	H	L	VH
Exploration	L	M	N/A	M	M	M	M	H	L	VH
Turbidity monitoring sensors	N/A	M	N/A	M	M	N/A	N/A	H	N/A	VH
Other disturbance (e.g. monitoring bore installation)	N/A	M	N/A	M	M	H	M	M	L	VH

1.2 Monitoring Results

This Compliance Monitoring Report provides the results of monitoring required by the MMP Approval Conditions, specifically:

- outlining what monitoring was undertaken of any activities carried out in accordance with condition 18 (b) and (c);
- identifying why the monitoring was capable of substantiating whether the limitations in conditions 5 and 9 are exceeded.

1.2.1 Condition 18 (b) and (c)

For the purposes of this CAR, Condition 18 (b) and (c) are listed in the Audit table (Appendix B) as:

- **Not required at this stage (NR)** - The requirements of the audit element were not triggered during the reporting period.

Compliance with this Condition is not yet able to be formally assessed as no management plans required by Condition 17 (which subsequently trigger the requirements of Condition 18) have been submitted to the State Development Minister at this stage, as the associated timelines for submission are not yet due or have not yet been triggered.

However, it is noted that the below listed management plans required by Condition 17 are due to be submitted to the State Development Minister at the same time as this CAR and as such, substantial progress has been made in the development of these plans. The management plans due on or near the same submission timeline as this CAR are the:

- Fauna Management Plan (within 6 months of the date of the MMP approval);
- Rehabilitation Schedule and Management Plan (by 30 June 2024); and
- Environmentally Hazardous Materials Management Plan (within 6 months of the date of the MMP approval).

As part of this CAR development, Ramboll undertook a review of the current drafts of the above management plans to verify that they included the content required by Condition 18 (b) and (c). Ramboll notes that this does not constitute a finding of compliance at this time as the final versions were not reviewed, however the versions reviewed contained the expected content listed in this Condition at the time of writing.

1.2.2 Condition 5

The process for verifying compliance with Condition 5 is described in detail in Section 1.1.1 and Appendix D. A summary of the monitoring undertaken, and the sites visited at both Huntly and Willowdale, is included in Table 6. Based on the outcomes of this monitoring process, Ramboll is satisfied that Alcoa is compliant with Condition 5.

1.2.3 Condition 9

Alcoa has implemented a systematic ground disturbance and clearing reconciliation process, which has been reviewed by Ramboll during verification activities undertaken as the independent compliance monitor. Ramboll reviewed the following evidence to verify this process:

- Approved Ground Disturbance Permits;
- Ground Disturbance Register;
- Post-clearing inspections and Mine Clearing register (weekly reconciliation); and
- ArcGIS system information, reviewed and updated (monthly reconciliation).

Based on this review, Ramboll is confident that Alcoa’s systematic processes are suitable to track incremental clearing undertaken each calendar year such that the 800ha limit described in Condition 9 is not exceeded. To date, Alcoa has cleared 46.51ha of land and commenced clearing of 101.49ha of the allowable 800ha stipulated by Condition 9.

Table 6 Summary of completed monitoring activities during the reporting period 2023/2024

Month	Monitoring activities		
	Desktop	Huntly	Willowdale
January 2024	Review of clearing, mining, rehabilitation, exploration, and drainage control activities against:	-	-
February 2024	<ul style="list-style-type: none"> Huntly Mine Disturbance Footprint and Native Vegetation Disturbance Footprint; Willowdale Mine Disturbance Footprint; Exploration Disturbance Footprint; Forest Clearing Advice area; Active internal Alcoa Ground Disturbance Permits (GDPs); 	<ul style="list-style-type: none"> Yate 5: exploration drilling checks Downes 16: drainage control Davey 2: drainage control Wittwer 8: FCA boundary checks Stone 13: FCA boundary checks, drainage control, black cockatoo tree inspections Martin 6 & 7: drainage control Rance 6, 7 & 8: drainage control Stone 6: native vegetation clearing boundary checks, drainage control Marshall 12, 13 & 14: FCA boundary checks, drainage control Witter 11: verification of native vegetation clearing boundary 	<ul style="list-style-type: none"> Boto 1 & 2: FCA boundary checks Wills 4: black cockatoo tree inspections
March 2024	<ul style="list-style-type: none"> Alcoa drainage survey and containment structure storage capacity risk assessments; Water reservoir top water level 1km buffer zone; Serpentine Pipehead Dam Catchment Area; 	<ul style="list-style-type: none"> Howson 2: FCA clearing boundary checks, black cockatoo tree inspections Lloyd 1 & 2: drainage control Lloyd 5 & 6: FCA boundary checks Downes 6: FCA boundary checks Kisler 11: FCA boundary checks Martin 3, 5 & 6: FCA boundary checks, drainage control, black cockatoo tree inspections Rance 1: FCA / native vegetation clearing boundary checks, drainage control Rance 2: drainage control Mabbott 1 & 2: drainage control 	<ul style="list-style-type: none"> Gibber 10, 12, 15, 16: drainage control Vaquita 8: drainage control Central 4: checks of MMP clearing boundary, black cockatoo tree inspections Irrawaddy 1: drainage control Minke 3: drainage control Arundel site stormwater management ponds AP1, AP2, AP3, AP4 and AP5 to inspect status of containment structures

Month	Monitoring activities		
	Desktop	Huntly	Willowdale
	<ul style="list-style-type: none"> Reservoir Protection Zones; Areas with an average slope gradient >16%, mapped at 5m resolution (based on Landgate-derived 5m digital elevation model); and Alcoa Black Cockatoo nesting trees and significant trees records. Completed exploration drilling activities. 	<ul style="list-style-type: none"> Ingpen 3: drainage control on road Rance 5: FCA, drainage control, black cockatoo tree inspections Stone 1: drainage control, black cockatoo tree inspections 	
April 2024		<ul style="list-style-type: none"> Simpson 1: drainage control, black cockatoo tree inspections Downes 7 & 8: FCA/native vegetation clearing boundary checks, drainage control, black cockatoos Downes 9: drainage control Downes 10: FCA, drainage control, black cockatoos Wittwer 6: drilling, black cockatoos Stone 5: FCA clearing boundary checks Stone 13: drainage control Marshall 6: within FCA clearing boundary, black cockatoos Kisler 13: within FCA/native vegetation clearing boundary, drainage control, black cockatoo tree inspections Atherton 1: FCA clearing boundary checks, black cockatoo tree inspections Ingpen 3: drainage control in pit Wittwer 7: drilling, black cockatoos Bennett 1: FCA clearing boundary checks, black cockatoo tree inspections SE59: chemical and stormwater facilities 	<ul style="list-style-type: none"> Central 4: black cockatoo tree checks and clearing boundary checks Flinders: clearing boundary checks Wills 6: drainage control Gibber 15: drainage control Wills 2: drainage control
May 2024		<ul style="list-style-type: none"> Radiata 8: drilling Deworboies 1: FCA, drainage control, black cockatoo tree inspections Manning 11: FCA clearing boundary checks 	<ul style="list-style-type: none"> Minke 1: drainage control Boto 2: drainage control Tasman 4: drilling Wills 6 & 7: drainage control

Month	Monitoring activities		
	Desktop	Huntly	Willowdale
		<ul style="list-style-type: none"> • Ingpen 5: drainage control, FCA • Ingpen 8: black cockatoos, boundary serpentine catchment • Dellamaddalena 5: drainage control opportunistically checked • Ingpen 1: FCA, drainage control • Ingpen 2: drainage control, FCA, black cockatoo tree inspections • Downes 3 & 16: black cockatoo inspections • Davey 1: drainage control • Wittwer 3: black cockatoo inspections • Macquarrie 1: drainage control • Stone 9: drainage control, FCA, black cockatoo inspections • Rance 1: within FCA clearing boundary, drainage control • Rance 8: drainage control • Mabbott 1: drainage control • Rhodes 6: drainage control • Rance 4: drainage control, FCA • Ingpen 4: black cockatoos, drainage control • Marshall 3: black cockatoos, drainage control, FCA • Rance 7: drainage control • MacCarthy 7: FCA, drainage control, black cockatoo inspections • Christopher Roberts 1: exploration drilling inspection • Wittwer 11: exploration drilling inspection • Kisler 9: FCA clearing boundary checks • Cable 5: exploration drilling inspection 	<ul style="list-style-type: none"> • Gibber 13: drainage control • Giles 15: exploration drilling • Wills 2: black cockatoo inspections • Sampson dam crossing area, Orion wastewater treatment facilities and storage sumps, Larego oily water pond and DAF holding sumps: chemical and stormwater facilities

Month	Monitoring activities		
	Desktop	Huntly	Willowdale
		<ul style="list-style-type: none"> SE02, PD01, SE61T, SE51T, SE03T: chemical and stormwater facilities Serpentine River causeway crossing inspection 	
June 2024 (until 20 th)		<ul style="list-style-type: none"> Rance 6: FCA boundary checks, black cockatoo tree checks, drainage control Ingpen 8: FCA boundary checks, drainage control Hill 2: FCA boundary checks, black cockatoo tree checks, drainage control Demarte 2: black cockatoo tree checks, drainage control Demarte 5: FCA boundary checks, drainage control Kisler 14: FCA boundary checks, black cockatoo tree checks, drainage control Stone 7: FCA boundary checks, drainage control Kisler 6: black cockatoo tree checks Blacklock 15 and 16: drainage control checks Mabbott 2: Drainage control checks Turbidity monitor checks – SE06T 	<ul style="list-style-type: none"> Turbidity monitor checks – HV07, HV08, HV10

1.3 Summary and Conclusion

Ramboll, as the Independent Compliance Monitor, is of the opinion that the monitoring undertaken to determine compliance with the respective conditions referred to for this Compliance Monitoring Report, is scientifically robust and capable of determining if the conditions have been met.

Based on a review of data provided, as well as through the outcomes of field verification activities, Ramboll is satisfied that Alcoa is compliant with the conditions referenced within this Compliance Monitoring report.

Appendix B

Detailed Summary of Compliance - Audit Table

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
SECTION 1: Overarching conditions and Interpretation								
<p><i>(1) General and Definitions</i></p> <p>The following conditions set out in this document are in addition to the requirements imposed on Alcoa of Australia Limited (Alcoa) by the Environmental Protection (Darling Range Bauxite Mining Proposals) Exemption Order 2023 (Exemption Order) however to the extent that the following conditions may be in their terms or operation inconsistent with the requirements of the Exemption Order in relation to the area of operation of the Exemption Order then the following conditions are subject to and do not detract from the requirements of the Exemption Order.</p> <p>In this document, subject to the context:</p> <p>"date of the MMP approval" means the date that the State Development Minister approved the MMP;</p> <p>"rehabilitation", in relation to an area that has been disturbed, includes -</p> <p>(a) stabilisation of an area; and</p> <p>(b) restoration of the landforms of the area to a state that is as close as practicable to their original undisturbed state; and</p> <p>(c) the return of the native vegetation of the area to a state that is as close as practicable to its original undisturbed state;</p> <p>"stabilise", in relation to an area that has been disturbed, means carry out landscaping, ripping and other appropriate operations to prevent erosion of sediment, promote infiltration and manage surface water runoff, and "stabilisation" has a corresponding meaning;</p> <p>In complying with the following conditions, Alcoa shall ensure compliance by its officers, employees, contractors, subcontractors and agents.</p>								
60-076783:M.1.2	Relinquishment of FCA areas.	<p>(2) Alcoa will treat as not having been endorsed, 1,231 ha of Forest Clearing Advices (FCAs) endorsed prior to 1 September 2023 as defined in Figure 5 of the Exemption Order, being:</p> <p>(a) 1,016 ha of FCA in Huntly; and</p> <p>(b) 214 ha of FCA in Willowdale.</p>	<p>Implement a mine planning and ground disturbance process that ensures disturbance only occurs within approved areas.</p> <p>Implement post-clearance validation and reconciliations processes to verify conformance with the condition.</p>	<p><u>Ground Disturbance Permits</u></p> <p>a) Approved Ground Disturbance Permits.</p> <p><u>Clearing Reconciliations</u></p> <p>b) Post-clearing inspections and Mine Clearing register (weekly reconciliation).</p> <p>c) ArcGIS system, reviewed and updated (monthly reconciliation).</p>	Overall	For the life of the Project	C	<p>No evidence of disturbance within the FCA areas referenced in Condition 2 was found.</p> <p>Evidence:</p> <ul style="list-style-type: none"> Desktop checks and site verification activities as described in Table 6.
60-076783:M.1.3	Mining within the Serpentine Dam Catchment	<p>(3) Within 10 business days of the date of the MMP approval, Alcoa must submit written evidence, to the satisfaction of the State Development Minister, demonstrating that the mining contemplated by the MMP within the Serpentine Dam Catchment is required from a social and economic perspective.</p>	<p>Written evidence submitted to the State Development Minister demonstrating that the mining contemplated within the Serpentine Dam Catchment is required from a social and economic perspective.</p>	<p>a) Written Evidence submitted to the State Development Minister.</p>	Overall	Within 10 days of the MMP Approval.	IP	<p>Submission of the evidence via email by C Fraser (Alcoa) to Minister for State Development, Western Australia observed within the required timeframe.</p> <p>Additional requests for further information from JTSI and DEMIRS were made after submission, with Alcoa providing further information on the 20th March 2024.</p> <p>At the time of writing, formal response that the State Development Minister is satisfied with the submission contents is yet to be received.</p> <p>Evidence:</p> <ul style="list-style-type: none"> Email dated 22nd December 2023 Attachment – Serpentine Dam Catchment – Mining Requirement Justification Letter – D Strange to Minister for State Development dated 20 March 2024

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
60-076783:M.1.4	Environmental Objectives	<p>(4) Any clearing, exploration, mining, or other operations permitted by this MMP approval must be implemented by Alcoa to meet the following environmental objectives:</p> <p>(a) avoiding or otherwise minimising clearing within 50 metres of Black Cockatoo nesting trees; and</p> <p>(b) avoiding or otherwise minimising discharge of environmentally hazardous material outside of containment infrastructure.</p> <p>IF</p> <p>(c) clearing within 50 metres of Black Cockatoo nesting trees; and/or</p> <p>(d) discharges of environmentally hazardous material outside of containment infrastructure, cannot be avoided, Alcoa must provide, to the satisfaction of the State Development Minister, a written report explaining why the relevant avoidance cannot be met prior to the clearing being undertaken.</p>	<p>Implement a survey and management process to enable identification, assessment (for suitability), demarcation and avoidance of black cockatoo nesting trees and associated buffer zones. The process will form part, and be integrated into, the Ground Disturbance Process.</p> <p>Where clearing is required within the 50-metre buffer, implement a reporting process to the State Development prior to the clearing being undertaken. The report will state the reason/s why avoidance cannot be achieved and what mitigation measures will be implemented to minimise the impact the identified nesting tree.</p> <p>Implement post-clearance validation and reconciliations processes to verify conformance with the condition.</p> <p><u>Supplementary Detail</u></p> <p>Black Cockatoo Nesting Trees</p> <p>Black Cockatoo nesting trees will be determined through field surveys undertaken by a suitably qualified and experience person (as defined below), using the following criteria:</p> <ul style="list-style-type: none"> - a tree containing 1 or more hollows that appear to be, or have been, used as a black cockatoo breeding habitat, OR - a tree containing 1 or more hollows that: <ul style="list-style-type: none"> o have a diameter not less than 100mm; and o have a depth not less than 500mm. <p><i>Note: Alcoa is in the process of seeking approval from DWER (in consultation with DBCA) to incorporate additional criteria for classification of Black Cockatoo nesting trees - refer below. If approval is received from DWER, the CAP will be revised and resubmitted to the State Development Minister for approval.</i></p> <p>AND</p> <ul style="list-style-type: none"> o is conducive of being used as a nesting hollow by black cockatoos, as determined by a suitably qualified and experienced person (as defined below). The assessment will consider entry angle and size, hollow chamber size and shape, height from ground (not less than 6 m) and health of the tree. OR o has the potential to develop into a suitable nesting hollow, as determined by a suitability qualified and experience person (as defined below). The assessment will be based on the potential to meet the above criteria. <p>Note: For exploration-related activities, a 'Chance Find' process will be applied in which</p>	<p><u>Black Cockatoo</u></p> <p>a) Pre-clearance survey (and associated reports) undertaken by Black Cockatoo expert (survey, identification, and assessment of Black Cockatoo nesting trees).</p> <p>b) Tags attached to confirmed nesting trees and significant trees, unique ID assigned.</p> <p>c) ArcGIS and associated mine planning processes reviewed and updated to reflect appropriate buffers in relation to the identified black cockatoo nesting and significant trees.</p> <p>d) 'Chance Find' reports (applies to exploration drilling activities), including GPS coordinates and photographs.</p> <p>e) Black Cockatoo Reports, submitted to the State Development Minister.</p> <p><u>Ground Disturbance Permits</u></p> <p>f) Approved Ground Disturbance Permits.</p> <p><u>Clearing Reconciliations</u></p> <p>g) Post-clearing inspections and Mine Clearing register (weekly reconciliation).</p> <p>h) ArcGIS system, reviewed and updated (monthly reconciliation).</p>	Overall	For the life of the Project	C	<p>No evidence of disturbance of nesting or significant black cockatoo trees within the 50m exclusion area. Unique ID tags and buffers for nesting / significant black cockatoo trees were checked while conducting field verification.</p> <p>FCA2023A was approved in the 2022 – 2026 MMP but has been included in the 2023 – 2027 clearing areas. This process was completed prior to the development of this Condition. Alcoa has revisited the clearing areas and determined some black cockatoo trees are within the 50m buffer zone. To meet Condition 4 (c) Alcoa has prepared a report to clarify why clearing cannot be avoided within 50 metres of Black Cockatoo nesting trees and to prove the clearing area has been minimised (0.48 ha) within 50 m of the Black Cockatoo nesting trees. Correspondence received confirmed that Condition 4c did not apply to historically endorsed FCAs</p> <p>Evidence:</p> <ul style="list-style-type: none"> • 2023-2027 MMP Condition 4 Report – Black Cockatoo clearing <ul style="list-style-type: none"> o Submission email of Black Cockatoo Report to Minister for State Development, Western Australia dated 24th January 2024 • Ground Disturbance Register • Black Cockatoo Survey Reports • Mine clearing register • Myara pre-clearance targeted fauna assessment

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information						
			<p>pre-drilling inspections will be undertaken by suitably trained operator/s, with potential black cockatoo nesting trees and significant trees (HUN) tagged and a 10 metre non-drilling buffer subsequently applied.</p> <p>Suitably qualified and experienced person <i>A suitably qualified and experienced black cockatoo person is someone that has demonstrated experience in conducting black cockatoo habitat surveys, specialising in the species of black cockatoos relevant to the region. This expertise includes in-depth and on-ground understanding of their behaviour (including foraging and roosting), habitat (including nesting) and conservation.</i></p>					<ul style="list-style-type: none"> Willowdale Minesite, Black Cockatoo Targeted Assessment 2023 ArcGIS data available of the identified/suspected black cockatoo nesting and significant trees. Review of unique ID tags and buffers for nesting /significant black cockatoo trees. Checked ID tags corresponded to the ArcGIS data. 						
			<p>Implement processes to categorise and manage sump and containment control structures that have the potential to contain environmental hazardous materials. The environmental hazardous materials sampling program will, at a minimum, include the following:</p> <ul style="list-style-type: none"> Hydrocarbons PFAS compounds (refer below for detail) Ethylene glycol <p>Implement monitoring, inspection, investigation/assessment and reporting processes to ensure timely identification, measurement, mitigation and reporting of drainage incidents.</p> <p>Hydrocarbon (HC) and Ethylene Glycol (EG) Criteria</p> <p>Based on the Australian and New Zealand Guidelines for Fresh and Marine Water Quality guidelines, the criteria used for PFAS is provided below for ease of reference.</p> <p>Note: The below referenced guideline levels (and associated standards) are provided as interim guidelines and will be superseded on approval of the final Water Resources Management Plan, refer Condition 14 of the MMP/</p> <table border="1" data-bbox="893 1661 1397 1869"> <thead> <tr> <th></th> <th>Guideline (ug/L)</th> <th>Reference</th> </tr> </thead> <tbody> <tr> <td>Total Petroleum Hydrocarbons (TPH)</td> <td>7</td> <td>ANZECC & ARMCANZ (2000) guidelines – Section 8.3.7</td> </tr> </tbody> </table>		Guideline (ug/L)	Reference	Total Petroleum Hydrocarbons (TPH)	7	ANZECC & ARMCANZ (2000) guidelines – Section 8.3.7	<p><u>Containment Structure / Sump Characterisation</u></p> <p>a) Register of sumps and associated risk characterisation (high / medium / low).</p> <p><u>Inspections</u></p> <p>b) Completed Red Alert Checklists and inspections of high-risk areas.</p> <p>c) Completed pit inspection checklists of active pits and high-risk areas.</p>	Overall	For the life of the Project	C	<p>During field verification activities, wastewater treatment facilities and storage sumps, DAF holding sumps and stormwater management facilities were inspected. No evidence of environmentally hazardous materials leakage was noted.</p> <p>Risk-based classification of sumps is ongoing. Sumps without a current risk classification default to 'high risk' status to take a conservative approach.</p> <p>Evidence:</p> <ul style="list-style-type: none"> Completed Red Alert Checklists Stream Water Quality and PFAS Ambient and Receiving Environment Sampling – Scope of Work Water Resource Management Plan GIS shapefiles of Huntly and Willowdale sumps Desktop checks and site verification activities as described in Table 6 by the independent compliance monitor.
	Guideline (ug/L)	Reference												
Total Petroleum Hydrocarbons (TPH)	7	ANZECC & ARMCANZ (2000) guidelines – Section 8.3.7												

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information															
			<table border="1"> <tr> <td>EG</td> <td>330</td> <td>ANZECC (freshwater low reliability trigger value)</td> </tr> </table> <p>PFAS Criteria Based on the PFAS National Environmental Management Plan Version 2), the criteria used for PFAS is provided below for ease of reference.</p> <table border="1"> <thead> <tr> <th></th> <th>Guideline (ug/L)</th> <th>Reference</th> </tr> </thead> <tbody> <tr> <td>PFOS</td> <td>0.00023</td> <td>99% species protection</td> </tr> <tr> <td>PFOA</td> <td>0.56</td> <td>Drinking Water Quality (Australia Government Department of Health 2019)</td> </tr> <tr> <td>Sum of PFOS + PFHxS</td> <td>0.07</td> <td>Drinking Water Quality (Australia Government Department of Health 2019)</td> </tr> </tbody> </table>	EG	330	ANZECC (freshwater low reliability trigger value)		Guideline (ug/L)	Reference	PFOS	0.00023	99% species protection	PFOA	0.56	Drinking Water Quality (Australia Government Department of Health 2019)	Sum of PFOS + PFHxS	0.07	Drinking Water Quality (Australia Government Department of Health 2019)					
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SECTION 2: Operational restrictions																							
<p>(6) Condition 5 does not apply to:</p> <p>(a) stabilisation or rehabilitation activities; or</p> <p>(b) environmental monitoring activities; or</p> <p>(c) use and maintenance of existing infrastructure; or</p> <p>(d) modification of existing road infrastructure with the written consent of the State Development Minister; or</p> <p>(e) construction of drainage control infrastructure; or</p> <p>(f) mining within 1 kilometre of the top water level of any water reservoir in Myara Central and Myara South carried out before 30 June 2024.</p>																							
60-076783:M.2.5	Activities within Restricted Areas	<p>(5) Alcoa must not undertake any clearing, exploration, mining or other operations:</p> <p>(a) within 1km of the top water level of any water reservoir; or</p> <p>(b) within the Serpentine Pipehead Dam Catchment;</p> <p>(c) in any area with an average slope greater than 16% within the Reservoir Protection Zone of any water reservoir; or</p> <p>(d) within 10 metres of any Black Cockatoo nesting trees or Black Cockatoo significant trees.</p>	<p>Implement exploration planning, mine planning and ground disturbance processes that ensures clearing, exploration, mining and other related operations only occurs within approved areas.</p> <p>Implement post-clearance validation and reconciliations processes to verify conformance with the condition.</p>	<p><u>Ground Disturbance Permits</u></p> <p>a) Approved Ground Disturbance Permits.</p> <p>b) Ground Disturbance Register.</p> <p><u>Exploration Activity Reconciliations</u></p> <p>c) Weekly drilling report.</p> <p>d) Monthly GIS output showing drilling activity locations.</p> <p><u>Clearing Reconciliations</u></p> <p>e) Post-clearing inspections and Mine Clearing register (weekly reconciliation).</p> <p>f) ArcGIS system, reviewed and updated (monthly reconciliation).</p>	Overall	For the life of the Project	C	<p>No evidence of new land disturbance within Restricted Areas as described in parts (a) – (d) of this Condition was observed during the monitoring period.</p> <p>Evidence:</p> <ul style="list-style-type: none"> Ground Disturbance Permit Register Exploration drilling database (updated monthly) Site verification activities as described in Table 6 by the independent compliance monitor. 															
60-076783:M.2.7	Drainage Controls and Stabilisation Activities	<p>(7) If any activity described in paragraphs (b) - (f) of condition 6 is undertaken, the disturbance must be stabilised either within 12 months of the relevant</p>	<p>Implement a drainage control and management program that provides fit for purpose design and construction of drainage control structures for areas where activity</p>	<p><u>Planning</u></p> <p>a) Land Stabilisation Plan and Stabilisation Schedule reviewed and updated based on status of mining activities.</p>	Overall	For the life of the Project	C	<p>Activities described in Condition 6 (a) – (f) have been undertaken during this monitoring period.</p>															

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
		activity ceasing, or within the first available rehabilitation season, whichever is earliest. Alcoa must implement drainage controls in the affected area until the area is stabilised.	(as described in Section 5 and Section 6 (b) – (f)) has ceased. Implement planning processes and associated procedures in relation land stabilisation activities to ensure that stabilisation activities are undertaken per the required timeframes within areas where activity (as described in Section 5 and Section 6 (b) – (f)) has ceased.	b) Drainage control integrated into the mine planning process. <u>Verification</u> c) Review and reconciliation process to track status of mining (including cessation), drainage control, stabilisation activities. d) Signed Completion Criteria checklists following completion of land stabilisation activities. e) Signed Post Construction validation checklists / audits (validating as built vs design drainage controls) – undertaken on a sample basis.				A review of associated land stabilisation plans, stabilisation schedule and drainage controls was undertaken to verify that Alcoa has programs in place to manage land stabilisation. The 12 month timeframe associated with this Condition has not been triggered for the purposes of this CAR, however Ramboll is satisfied that planning processes are being implemented to satisfy this Condition. Evidence: <ul style="list-style-type: none"> • Land stabilisation plans • Land stabilisation schedule • GIS reconciliation process • Site verification activities as described in Table 6 by the independent compliance monitor.
SECTION 3 – Clearing Restrictions								
60-076783:M.3.8	Timing of Clearing Activities - MOG	(8) Alcoa will not undertake any MMP-related clearing until the Mine Operations Group (MOG) has provided its endorsement of the relevant FCA.	Implement mine planning and ground disturbance processes that ensures MMP-related clearing only occurs within FCA areas that have received MOG endorsement. Implement post-clearance validation and reconciliations processes to verify conformance with the condition.	<u>FCA and MOG Endorsement</u> a) FCA Approvals for mining area b) Formal correspondence from MOG endorsing clearing within FCA areas. <u>Ground Disturbance Permits</u> c) Approved Ground Disturbance Permits. d) Ground Disturbance Register. <u>Clearing Reconciliations</u> e) Post-clearing inspections and Mine Clearing register (weekly reconciliation). f) ArcGIS system, reviewed and updated (monthly reconciliation).	Overall	For the life of the Project	C	No evidence of clearing beyond the approved FCA areas was observed during the monitoring period. In 2023, Alcoa has submitted FCA2023a and FCA2023b, of which the latter was amended after the current MMP Approval and received MOG’s endorsement 22 nd May 2024. Evidence: <ul style="list-style-type: none"> • FCA2023a with DCMPs and MOG endorsement dated 8th December 2024 • FCA2023b with DCMPs and MOG endorsement dated 22nd May 2024 • Ground Disturbance Register • 3rd party reviewing the ArcGIS data related to the field verification sites on weekly basis • Site verification activities as described in Table 6 by the

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
								independent compliance monitor. <ul style="list-style-type: none"> Approved GDPs that confirm MOG approval
60-076783:M.3.9	Annual Clearing Limit (hectares)	(9) Alcoa will not clear more than 800ha of native vegetation for MMP-related mining activities per calendar year for the duration of the Exemption Order.	Implement a mine planning and ground disturbance processes that ensures clearing associated with MMP-related mining activities does not exceed 800 hectares within a calendar year. Implement post-clearance validation and reconciliations processes to verify conformance with the condition.	<u>Ground Disturbance Permits</u> a) Approved Ground Disturbance Permits. b) Ground Disturbance Register. <u>Clearing Reconciliations</u> c) Post-clearing inspections and Mine Clearing register (weekly reconciliation). d) ArcGIS system, reviewed and updated (monthly reconciliation).	Overall	For the life of the Project	C	During the first 6 months of the calendar year, Alcoa has cleared 46.51 ha and commenced clearing of 101.49 ha of native vegetation. It is anticipated at this stage that Alcoa will not reach the annual 800 ha clearing cap. Evidence: <ul style="list-style-type: none"> Ground Disturbance Permits Ground Disturbance Register Spatial data of clearing layers showing the most recent update date Email confirming hectares harvested/cleared to date
60-076783:M.3.10	Roll Over of unused Annual Clearing Limit	(10) Unused capacity from the annual clearing cap detailed within Condition 9 may be rolled over into the following year, only following approval from the State Development Minister as part of any subsequent MMP submissions.	Implement processes to monitor annual clearing rates and engage with the State Development Minister to discuss and seek approval for rolling over of unused capacity from the annual clearing cap. Implement a mine planning and ground disturbance processes that ensures clearing associated with MMP-related mining activities does not exceed the approved annual cap (800ha plus an additional hectares approved by the State Development Minister) in a calendar year. Implement post-clearance validation and reconciliations processes to verify conformance with the condition.	<u>Approvals</u> a) Formal correspondence from the State Development Minister in relation to approval of rolling over of unused clearing capacity. <u>Ground Disturbance Permits</u> b) Approved Ground Disturbance Permits. c) Ground Disturbance Register. <u>Clearing Reconciliations</u> d) Post-clearing inspections and Mine Clearing register (weekly reconciliation). e) ArcGIS system, reviewed and updated (monthly reconciliation).	Overall	For the life of the Project	NR	Alcoa has operated for 6 months under this current MMP. No evidence of planned roll over of unused annual clearing capacity is required at this stage. As described in Condition 9, Alcoa implements a mine planning and ground disturbance processes that ensures clearing associated with MMP-related mining activities is monitored. Evidence: <ul style="list-style-type: none"> Ground Disturbance Permits Ground Disturbance Register Desktop checks and site verification activities as described in Table 6 by the independent compliance monitor.

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
60-076783:M.3.11	FCA Submissions to the MOG	<p>(11) Alcoa will ensure that FCA submissions to the MOG for pits or haul roads within the public drinking water catchment areas are accompanied by Drainage Control Management Plans (DCMP) that are capable of meeting the requirements of condition 14(b)(iii). DCMPs are conceptual designs and will be developed using the Drainage Design Manual and field data and will include an assessment against the Groundwater Risk Assessment Framework (2021 Forest Clearing Advice 23 March 2022).</p>	<p>Preparation of Drainage Control Management Plans for each pit and/or haul roads located within the public drinking water catchment area. The development of the conceptual plans will:</p> <ul style="list-style-type: none"> be informed by the Drainage Design Manual and relevant field data; and include an assessment against the Groundwater Risk Assessment Framework (2021 Forest Clearing Advice 23 March 2022). 	<p><u>FCA Submissions to the MOG</u></p> <p>a) Drainage Control Management Plans, inclusive of the assessment against the Groundwater Risk Assessment Framework, attached to all FCA submissions to the MOG for pits and haul roads within the public drinking water catchment areas.</p>	Overall	For the life of the Project	C	<p>Alcoa’s procedure to prepare FCAs, including DCMPs was reviewed based on the FCAs originally prepared prior to the current MMP monitoring period. The FCA2023b was amended and partially endorsed by MOG during the current MMP monitoring period (May 2024). Ramboll notes the review of the DCMPs associated with FCA2023B by the MOG raises some concerns on their ability to fully mitigate the potential of discharges from containment infrastructure. The associated recommendation from the MOG is that the DCMPs (and FCA2023B) are endorsed, with additional conditions applied. Given the recent application of these additional conditions, their implementation and associated review of requirements by Ramboll as the Independent Compliance Monitor has not been assessed, and will form part of future compliance monitoring activities.</p> <p>Evidence:</p> <ul style="list-style-type: none"> FCA2023a with DCMPs and MOG endorsement dated 8th December 2024 FCA2023b with DCMPs and MOG endorsement dated 22nd May 2024 Hydrology Review and Assessment of FCA2023B Huntly – Part 1 Summary Advice dated 17th May 2024
60-076783:M.3.12	Clearing associated within >16% average slope areas	<p>(12) Alcoa will ensure that for MOG-endorsed clearing for haul roads or pits where the average slope is greater than 16% or where sub-catchments in which mining disturbance is greater than 30% of the total sub catchment area:</p> <p>(a) pit and drainage control as-builts and details on any design variations will be provided to the MOG twice a</p>	<p>Implement processes to ensure that the following are implemented for MOG-endorsed clearing for haul roads or pits that meet the average slope and % mining disturbance within the sub-catchment area:</p> <ul style="list-style-type: none"> provision of pit and drainage control as-builts and details on any design variations to the MOG twice a year, at least 4 months apart; provision of conceptual rehabilitation designs to the MOG 6 months following FCA endorsement; 	<p><u>Submission of Information to the MOG</u></p> <p>a) Database of pits and facilities that meet the criteria of this condition</p> <p>b) Pit and drainage control as-builts and details on any design variations twice a year, at least 4 months apart;</p> <p>c) conceptual rehabilitation designs 6 months following FCA endorsement.</p> <p><u>Ground Disturbance Permits (avoidance of areas)</u></p> <p>d) Approved Ground Disturbance Permits.</p>	Overall	For the life of the Project	C	<p>Refer to commentary for Condition 11. Condition 12 (a) and (b) and (c) are not yet triggered as clearing within the identified constraints has not been completed. Ramboll reviewed a number of consultant reports for flora and fauna surveys undertaken within the MMP 2023 – 2027 area indicating</p>

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
		<p>year, at least 4 months apart;</p> <p>(b) conceptual rehabilitation designs will be provided to the MOG 6 months after FCA endorsement;</p> <p>(c) no clearing will be undertaken where the topographic wetness index is greater than or equal to 9, and groundwater data availability is less than 12 months;</p> <p>(d) undertake targeted fauna and flora and vegetation surveys for all future clearing under the MMP, as per the Flora and Vegetation and Fauna Management Plans; and</p> <p>Following completion of the work required by condition 26(a), undertake a clearing risk assessment to ensure appropriate avoidance and management measures are implemented for all future clearing under the MMP, and submit these to MOG with each FCA submission.</p>	<ul style="list-style-type: none"> avoidance of clearing where the topographic wetness index is greater than or equal to 9, and groundwater data availability is less than 12 months; execution of targeted fauna and flora and vegetation surveys for all future clearing under the MMP, undertaken in accordance with the respective Flora and Vegetation and Fauna Management Plan. <p>Upon finalisation of the clearing risk assessment methodology, implement processes to ensure clearing risk assessment are undertaken for all future clearing under the MMP, with outcomes attached to the respective FCA submissions.</p> <p>Calculating Mining Disturbance % within total sub-catchment area:</p> <ul style="list-style-type: none"> Current state is calculated on the 10th of each month (allows time for end of month data to be published), at which point each sub-catchment has the area 'cleared' and 'rehabilitated' to date assigned. The percentage of clearing is calculated by dividing the area cleared (at the proposed date if relevant) by the total area of the sub-catchment. If the relevant clearing shape is contributing to a sub-catchment being >30% cleared, then the shape is split to further calculate the proportion of that clearing shape that will contribute to the "over clearing" of a sub-catchment. <p>Note: When completing the analysis for a new submission, the proposed additional clearing for each of the years in the submission are then added to this, i.e., analysing a shape in 2027 would have proposed clearing for 2025, 2026, and 2027 added to the current state to see how much would hypothetically be cleared at the year of the shapes proposed clearing.</p> <p>Calculating Average Slope of an Area</p> <p>In relation to the deriving the average slope for areas, Alcoa will use the original version of the DOLA contours to derive the slope layer. The methodology to be used to develop the slope layer and associated average slope is as follows:</p> <ul style="list-style-type: none"> Clip the contours to the active and future mining region. Run Topo to Raster (available from ArcGIS Pro) with the clipped contours as the input and using the default settings (extent of the contours to be used as the processing extent). Clip the resulting raster to the region of interest using Clip Raster (available from ArcGIS Pro). 	<p>e) Ground Disturbance Register.</p> <p><u>Flora and Fauna Surveys</u></p> <p>f) Completed flora and fauna and vegetation surveys, undertaken in accordance with the respective Flora and Vegetation and Fauna Management Plan.</p>				<p>compliance with condition 12 (d).</p> <p>Evidence:</p> <ul style="list-style-type: none"> FCA2023b with DCMs and MOG endorsement dated 22nd May 2024 Ground Disturbance Permits Ground Disturbance Register Completed/ongoing Flora and Fauna surveys Clearing risk assessment work has not yet commenced, as Condition 26(a) is not yet applicable.

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			<ul style="list-style-type: none"> • Convert the resulting raster to a slope (percent rise) raster using the Slope (available from ArcGIS Pro) tool. • The above steps were completed for each region of interest and merged into a single raster. • The calculation of the pit slope average using the slope layer as describe above is: <ul style="list-style-type: none"> ○ the individual continuous pit polygon (inclusive of current and future clearing) is used to clip the slope raster. ○ the resulting raster properties are used to obtain the mean slope value. <p>Note: Data used to generate the slope average of an area must be dated prior to mining disturbance, or at or prior to 20 December 2023 if mining disturbance occurred in the subject area prior to that date.</p>					
SECTION 4 – Management Plans								
60-076783:M.4.13	Implementation of Management Plans	<p>(13) Alcoa will implement to the extent practicable the plans referred to below until the relevant revised plan is submitted to the State Development Minister in accordance with condition 14:</p> <p>(a) Fauna Management Plan (Version 0) submitted to the Minister for State Development on 13 November 2023, as included in the MMP;</p> <p>(b) Water Resources Management Plan (Version 1) submitted to the Minister for State Development on 13 November 2023, as included in the MMP;</p> <p>(c) Recreational Trails and Facilities Management Plan submitted to the Minister for State Development on 13 November 2023, as included the MMP; and</p> <p>(d) Flora and Vegetation Management Plan submitted to the Minister for State Development on 13 November 2023, as included the MMP.</p>	<p>Execute the requirements within the respective management plans, to the extent practicable.</p> <p>Implement process to assess, monitor and verify implementation conformance with the commitments within the respective Management Plans, with associated improvement programs in place to address identified performance gaps.</p> <p>The assessment will also identify commitments that are considered practicable and record associated justification / reasoning and details of any associated action plans to address the commitment.</p>	<p><u>Management Plan Conformance Tracking</u></p> <p>a) Management Plan Commitments Register</p>	Overall	For the life of the Project	C	<p>Management Plan Commitment Registers have been implemented for the Management Plans mentioned in Condition 13 a – d. Registers include management actions and monitoring commitments and reporting requirements.</p> <p>A review of the plans implementation was undertaken. This review verified through review of associated evidence and records that the plans were being implemented, to the extent practicable.</p> <p>The review undertaken identified known difficulties in fully implementing the Water Resources Management Plan (WRMP) management and monitoring actions as they are currently written. A detailed review of Alcoa’s plans to improve the WRMP implementation was conducted, with Ramboll being satisfied that Alcoa is making best efforts to improve their ability to implement the current plan</p>

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
								<p>and demonstrating progress towards revising the Plan in line with expectations of Condition 17, including better defined monitoring parameters, contingency measures, sampling locations, thresholds, and trigger actions.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Management Plan Commitments Registers provided for the following Management Plans: <ul style="list-style-type: none"> ○ Fauna ○ Water Resources ○ Recreational Trails and Facilities ○ Flora & Vegetation • Stream Water Quality and PFAS Ambient and Receiving Environment Sampling – Scope of Work • Water Resources Management Plan (WRMP) – Scope of Work • Pre-clearance fauna spotter assessments • Flora and Fauna survey reports • Groundwater monitoring bores – monitoring results April 2024
60-076783:M.4.14	Revision of Management Plans	<p>(14) Alcoa will review and update the plans referred to below and submit them to the State Development Minister for approval within the timeframes outlined in condition 17, and in accordance with Environmental Protection Authority’s Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (EPA, 2021):</p> <p>(a) the Fauna Management Plan (Version 0), in consultation with the Department of Biodiversity, Conservation and Attractions (DBCA) and relevant stakeholders so that it:</p>	<p>Review and update the below-referenced Management Plans to address the performance and/or consultation requirements outlined within the Condition.</p> <ul style="list-style-type: none"> • Fauna Management Plan, Version 0 (to be submitted within 6 months of MMP approval date, per Condition 17) • Water Resources Management Plan, Version 1 (to be within 6 months of receiving feedback from the MMPLG, per Condition 17) • Recreational Trails and Facilities Management Plans (to be submitted by 31 December 2024, per Condition 17) • Flora and Vegetation Management Plan (to be submitted within 6 months of MMP approval date, per Condition 17) 	<p><u>Management Plans</u></p> <p>a) Fauna Management Plan, V0 b) Water Resources Management Plan, V1 c) Recreational Trails and Facilities Management Plans d) Flora and Vegetation Management Plan</p> <p><u>Submission and Consultation</u></p> <p>e) Written Evidence showing management plans have been submitted to the State Development Minister in accordance with the submission timeframes outlined within the condition. f) Meeting minutes and/or correspondence provided to /</p>	Overall	Refer to Condition 17 (60-076783:M.4.17) for submission timeframes for the respective management plans. For the life of the Project.	NR	<p>Review and submission of the required management plans to the State Development Minister appears to be on track to be executed in accordance with the given timeframes in Condition 17.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Fauna Management plan, V1.5 • DBCA consultation records • Water Resources Management Plan, V1 • Recreational Trails and Facilities Management Plan

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
		i. satisfies the requirements of conditions 18 and 19; and (b) the Water Resources Management Plan (V1) so that it: i. satisfies the requirements of conditions 18 and 19; ii. satisfactorily addresses comments received by the MMPLG; and iii. includes data and analysis that demonstrates the effectiveness of implementation of drainage controls, stabilisation and rehabilitation at avoiding, minimising and mitigating potential impacts to drinking water quality within water reservoirs, as proposed in each DCMP submitted in accordance with conditions 11 and 16. (c) the Recreational Trails and Facilities Management Plans, in consultation with DBCA and relevant stakeholders so that it: i. satisfies the requirements of conditions 18 and 19; (d) the Flora and Vegetation Management Plan, in consultation with DBCA and relevant stakeholders so that it: i. satisfies the requirements of conditions 18 and 19.	Undertake consultation with the following stakeholder groups in relation to the development of the respective management plans: <ul style="list-style-type: none"> • Department of Biodiversity, Conservation and Attractions (DBCA) and other relevant stakeholders, with respect to <ul style="list-style-type: none"> ○ Fauna Management Plan ○ Flora and Vegetation Management Plan ○ Recreational Trails and Facilities Management Plans • Mining and Management Program Liaison Group (MMPLG) with respect to the Water Resources Management Plan. 	received from the listed Stakeholders for the respective management plans. g) Register (or equivalent) that verifies that all comments received as part of the consultation processes have been adequately addressed or responded to.				<ul style="list-style-type: none"> • Stream Water Quality and PFAS Ambient and Receiving Environment Sampling – Scope of Work • Water Resources Management Plan (WRMP) – Consultant Scope of Work
60-076783:M.4.15	Submission of Management Plans	(15) Alcoa must prepare the management plans referred to below and submit them to the State Development Minister for approval within the timeframes outlined in condition 17 and where relevant, in accordance with Environmental Protection Authority’s Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (EPA, 2021):	Preparation and submission of the below-listed management plans, developed in accordance with the requirements of this conditions: <ul style="list-style-type: none"> • Rehabilitation Schedule and Management Plan (to be submitted by 30 June 2024, per Condition 17) • Environment Hazardous Materials Management Plan (to be submitted within 6 months of MMP approval date, per Condition 17) 	<u>Management Plans</u> a) Rehabilitation Schedule and Management Plan b) Environment Hazardous Materials Management Plan c) ML1SA Operational Cultural Heritage Plan <u>Submission and Consultation</u> d) Written Evidence showing management plans have been submitted to the State Development Minister in accordance with the	Overall	For the life of the Project	NR	Ramboll reviewed the current Rehabilitation Schedule and Management Plan and Environmentally Hazardous Materials Management Plan drafts and verified that current working version contained the required content. Submission of the management plans appears to be on track to be executed in accordance with the given timeframes.

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
		<p>(a) Rehabilitation Schedule and Management Plan that:</p> <ul style="list-style-type: none"> i. initially satisfies the requirements of condition 17(b), and then as part of any subsequent MMP submission; ii. demonstrates that condition 7 has been complied with; iii. includes a detailed rolling 5 yearly stabilisation/ rehabilitation schedule that meets completion criteria and demonstrates an increase each consecutive year in the area (ha) in which stabilisation and rehabilitation activities are being undertaken over the next 4 years, achieving a minimum of 3,159 ha of rehabilitation (cumulative) over this period (2024-2027); and iv. demonstrates that Alcoa is prioritising rehabilitation within public drinking water catchment areas. <p>(b) Environmentally Hazardous Materials Management Plan that:</p> <ul style="list-style-type: none"> i. satisfies the requirements of conditions 18 and 19; and ii. demonstrates how the environmental objective in condition 4(b) will be achieved. <p>(c) ML1SA operational Cultural Heritage Management Plan, in consultation with Gnaala Karla Booja and the Department of Planning Lands and Heritage.</p>	<ul style="list-style-type: none"> • ML1SA Operational Cultural Heritage Plan (to be submitted by 31 December 2024, per Condition 17) <p>Undertake consultation with the following stakeholder groups in relation to the development of the ML1SA operational Cultural Heritage Plan:</p> <ul style="list-style-type: none"> • Gnaala Karla Booja • Department of Planning, Lands and Heritage 	<p>submission timeframes outlined within the condition.</p> <ul style="list-style-type: none"> e) Meeting minutes and/or correspondence provided to / received from the listed Stakeholders in relation to the development of the ML1SA operational Cultural Heritage Plan. f) Register (or equivalent) that verifies that all comments received as part of the consultation processes have been adequately addressed or responded to. 				<p>Alcoa advises that a first draft of the Cultural Heritage Plan has been developed in consultation with stakeholders (Gnaala Karla Booja Aboriginal Corporation and Department of Planning, Lands and Heritage) regarding the development of the ML1SA operational Cultural Heritage Plan.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Rehabilitation Management Plan V1.1 • Environmentally Hazardous Materials Management Plan DRAFT (05/2024) • Email communication – Cultural Heritage Plan
60-076783:M.4.16	Preparation of Drainage Control Management Plans (DCMPs)	<p>(16) If undertaking clearing for pits and haul roads within a public drinking water catchment area, Alcoa must:</p> <ul style="list-style-type: none"> (a) develop a DCMP prior to commencement of the activity; (b) implement the relevant DCMP; 	<p>Implement a mine planning and ground disturbance processes that identifies and governs clearing activities for pits and haul roads within public drinking water catchment areas in accordance with the corresponding DCMP.</p> <p>Preparation (and submission, if required) and implementation of relevant DCMPs where clearing for pits and haul roads within public drinking water catchment area is required.</p>	<p><u>Management Plans</u></p> <ul style="list-style-type: none"> a) DCMP and associated as-built plans for all clearing areas (associated with pits and haul roads) within public drinking water catchment areas. <p><u>Ground Disturbance Permits</u></p> <ul style="list-style-type: none"> b) Approved Ground Disturbance Permits. c) Ground Disturbance Register. 	Overall	For the life of the Project	C	<p>Refer to commentary for Condition 11. The MOG review of the DCMPs noted that Condition 16 (a) included submission of a summary DCMP and four revised DCMPs for FCA2023B Condition 16 (b) – (d) is not yet triggered as clearing for FCA2023B has yet to occur.</p>

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
		(c) provide the State Development Minister with a copy of DCMPs upon his/her request; and (d) provide the State Development Minister with a copy of a DCMP as-builts within four months of construction, upon his/her request.	The DCMP/s are to be integrated into the ground disturbance process and revised where required. Implement post-clearance validation and reconciliations processes to verify conformance with the condition.	<u>Clearing Reconciliations</u> d) Post-clearing inspections and Mine Clearing register (weekly reconciliation). e) ArcGIS system, reviewed and updated (monthly reconciliation). <u>Submission of Plans</u> f) If requested, written evidence showing DCMP and associated as-builts have been submitted to the State Development Minister.				Evidence: <ul style="list-style-type: none"> FCA2023b with DCMPs and MOG endorsement dated 22nd May 2024 Hydrology Review and Assessment of FCA2023B Huntly – Part 1 Summary Advice dated 17th May 2024 Ground Disturbance Permits include a requirement for a DCMP. Ground Disturbance Register
60-076783:M.4.17	Submission of Management Plans	(17) Alcoa must submit the management plans to the State Development Minister within the following time periods, or such other time period should the State Development Minister determine, following a request from Alcoa: (a) revised Fauna Management Plan, within 6 months of the date of the MMP approval; (b) Rehabilitation Schedule and Management Plan, by 30 June 2024; (c) revised Water Resources Management Plan, within 6 months of receiving feedback from the MMPLG; (d) Recreational Trails and Facilities Management Plan, by 31 December 2024; (e) Environmentally Hazardous Materials Management Plan, within 6 months of the date of the MMP approval. (f) ML1SA operational Cultural Heritage Management Plan, by 31 December 2024. (g) Flora and Vegetation Management Plan, by 31 December 2024.	Preparation and submission of the listed management plans, developed in accordance with the requirements of this conditions, and requirements and consultation requirements outlined in: <ul style="list-style-type: none"> Condition 14 Condition 15 	<u>Submission of Management Plans</u> a) Written Evidence showing management plans have been submitted to the State Development Minister in accordance with the submission timeframes outlined within the condition; OR b) Evidence of approval by the State Development to vary the due date.	Overall	For the life of the Project	NR	Submission dates for the management plans required in this Condition have not been triggered at the time of this CAR development. Ramboll undertook a review of the working drafts of these management plans to confirm that the timeframes required by this Condition appeared capable of being met. Submission of the required management plans to the State Development Minister appears to be on track to be executed in accordance with the given timeframes. Evidence: <ul style="list-style-type: none"> Fauna Management Plan, V1.5 Rehabilitation Schedule and Management Plan V1.1 Email conforming that Alcoa has received comments from DEMIRS to their Water Resource Management Plan Environmentally Hazardous Materials Management Plan DRAFT 05/2024 Communications with regulatory bodies – email and engagement register evidence
60-076783:M.4.18	Submission of Management Plans	(18) The management plans required under condition 17 must contain evidence to demonstrate compliance with relevant Operational restrictions and	Management Plan listed in Condition 17 will be prepared in accordance with the requirements of this condition.	<u>Management Plan/s</u> a) Mapping table to be provided within the respective Management Plans outlining which section/s of the	Overall	For the life of the Project	NR	As part of this CAR development, Ramboll undertook a review of the current drafts of those

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
		Clearing restrictions conditions, and must also include: (a) threshold criteria and trigger criteria that are relevant to the environmental impacts that the plans are mitigating and managing; (b) monitoring parameters, sites, control/reference sites, methodology, timing and frequencies, which will be used to measure threshold criteria and trigger criteria; (c) methodology for determining alternate monitoring sites as a contingency if proposed sites are not suitable in the future; (d) data collection and analysis methodologies; (e) adaptive management methodology; (f) contingency measures which will be implemented if threshold criteria or trigger criteria are not met; and (g) reporting requirements.		Management Plans address the requirements of this Condition.				management plans due to be submitted in June 2024 to verify that they included the content required by Condition 18. Ramboll notes that this does not constitute a finding of compliance at this time as the final versions were not reviewed, however the versions reviewed contained the expected content listed in this Condition at the time of writing. Evidence: <ul style="list-style-type: none"> • Fauna Management Plan V1.5 • Rehabilitation Schedule and Management Plan V1.1 • Environmentally Hazardous Materials Management Plan DRAFT 05/2024
60-076783:M.4.19	Scope of Management Plans	(19) The management plans required under condition 17 must, also contain provisions which demonstrate whether conditions 4 (a) and (b) and relevant Operational restrictions and Clearing restrictions conditions are reasonably likely to be met, and must also include: (a) management actions; (b) management targets; (c) contingency measures if management targets are not met; and (d) reporting requirements.	Management Plan listed in Condition 17 will be prepared in accordance with the requirements of this condition.	<u>Management Plan/s</u> a) Mapping table to be provided within the respective Management Plans outlining which section/s of the Management Plans address the requirements of this Condition.	Overall	For the life of the Project	NR	As part of this CAR development, Ramboll undertook a review of the current drafts of those management plans due to be submitted in June 2024 to verify that they included the content required by Condition 19. Ramboll notes that this does not constitute a finding of compliance at this time as the final versions were not reviewed, however the versions reviewed contained the expected content listed in this Condition at the time of writing. Evidence: <ul style="list-style-type: none"> • Fauna Management Plan V1.5 • Rehabilitation Schedule and Management Plan V1.1 • Environmentally Hazardous Materials Management Plan DRAFT 05/2024

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
60-076783:M.4.20	Implementation of Management Plans	<p>(20) Upon submission of each management plan, Alcoa must, to the extent practicable:</p> <p>(a) implement the submitted management plan(s) until receiving notice from the State Development Minister confirming that the management plan(s) satisfies the relevant requirements (i.e. is approved); and</p> <p>(b) following approval by the State Development Minister, implement the most recently approved version of the management plan.</p>	<p>Implement the submitted management plan/s, to the extent practicable, until receiving notice from the State Development Minister confirming that the management plan/s satisfies the relevant requirements. Following approval from the State Development Minister, implement the most recent version of the approved management plans.</p>	<p><u>Management Plan Conformance Tracking</u></p> <p>a) Management Plan Commitments Register</p>	Overall	For the life of the Project	NR	<p>Management Plan Commitments Registers have been implemented for the current Management Plans. Registers include management actions and monitoring commitments and reporting requirements. Ramboll expects that upon approval of the revised management plans, the respective commitments register will be updated by Alcoa.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Management Plan Commitments Registers provided for the following Management Plans: <ul style="list-style-type: none"> ○ Fauna ○ Water Resources ○ Recreational Trails and Facilities ○ Flora & Vegetation
60-076783:M.4.21	Revision and Resubmission of Management Plans	<p>(21) Alcoa:</p> <p>(a) may review, revise and re-submit to the State Development Minister any management plan listed in condition 17 at any time provided it meets the relevant requirements of that management plan, including any consultation that may be required when preparing the management plan; and</p> <p>(b) must review and revise any management plan listed in condition 17 and ensure it meets the relevant requirements of that management plan, including any consultation that may be required when preparing the management plan, as and when directed by the State Development Minister.</p>	<p>Implement a management plan review process to ensure the Management Plans required under the MMP Approval remain representative of operational systems, processes and controls. Any revisions of the management plans will be subject to a formal change management process to ensure that all relevant requirements of the MMP approval are appropriately addressed as part of the revision process.</p>	<p><u>Management Plan Review and Revision Process:</u></p> <p>a) Management Plan review schedule (planned)</p> <p>b) Change Management template, completed for any subsequent revision of a management plan required under this MMP Approval.</p> <p><u>Submission of Management Plans:</u></p> <p>c) Written Evidence showing management plans have been submitted to the State Development Minister</p>	Overall	For the life of the Project	NR	<p>Draft management plans were observed to be undergoing a review process and appeared to be on track to be submitted to the State Development Minister within the given timeframes in Condition 17.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Fauna Management Plan V1.5 • Rehabilitation Schedule and Management Plan V1.1 • Environmentally Hazardous Materials Management Plan DRAFT 05/2024 • Water Resources Management Plan (WRMP) – Scope of Work • Stream Water Quality and PFAS Ambient and receiving Environment Sampling – Scope of Work

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
60-076783:M.4.22	Publishing of Management Plans	(22) Approved management plans, and any revised management plans, must be published on Alcoa's website and provided to the State Development Minister in electronic form suitable for on-line publication within twenty (21) business days of being implemented, or being required to be implemented (whichever is earlier).	All approved Management Plans associated with the MMP approval will be published and made publicly available on Alcoa's website within: <ul style="list-style-type: none"> 21 days of being implemented, or Being required to be implemented (whichever is earlier) 	<u>Management Plans uploaded to Alcoa website:</u> a) Copies of the approved Management Plan will be available at the link (Alcoa - Australia News - Reports and Publications), or equivalent.	Overall	For the life of the Project	C	The current management plans (Condition 13) have been published on Alcoa's website. The new and revised management plans (Condition 17) will be provided to the State Development Minister and published in accordance with Condition 22. Evidence: <ul style="list-style-type: none"> Current Management Plans are publicly available: Alcoa -- Australia News - Reports and Publications
SECTION 5 – Rehabilitation Completion Criteria								
60-076783:M.5.23	Revised Rehabilitation Completion Criteria	(23) Alcoa will consult with the DBCA in the drafting of a revised set of Rehabilitation Completion Criteria and once agreed, provide these to the State Development Minister by 31 December 2024.	In consultation with the DBCA, develop and submit a revised set of Rehabilitation Completion Criteria to the State Development Minister.	<u>Rehabilitation Completion Criteria:</u> a) Revised set of Rehabilitation Completion Criteria b) Correspondence with DBCA in relation to the development of the Rehabilitation Completion Criteria. <u>Submission and Consultation</u> c) Written Evidence showing revised Rehabilitation Completion Criteria has been submitted to the State Development Minister in accordance with the submission timeframes outlined within the condition.	Overall.	Submission by 31 December 2024.	NR	This condition is not yet required.
SECTION 6 – Re-establishment and operation of the Independent Technical Advisory Group								
60-076783:M.6.24	Reestablishment of the ITAG with independent chair	(24) Alcoa will provide adequate resourcing to ensure that the ITAG (formerly Bauxite Hydrology Committee), with an independent chair, is reconstituted by 30 June 2024.	Provision of adequate resourcing and related support to enable the reconstitution (and ongoing activities) of an Independent Technical Advisory Group (ITAG) associated with the Alcoa operations.	<u>Independent Technical Advisory Group</u> a) Terms of Reference for the ITAG, and appointment of independent chair b) Meeting Minutes for the ITAG <u>Provision of Adequate Resourcing and Support to reconstitute the ITAG</u> c) Confirmation from the ITAG independent chair that adequate resourcing has been provided by Alcoa in re-establishing the ITAG OR d) Formal Correspondence with the State Development Minister that demonstrates measures taken by Alcoa in relation to provision of adequate resourcing to support the reconstitution of the ITAG by the due date, if confirmation from the chair is not possible (i.e. should the ITAG not be formally constituted by the due date)	Overall	Establishment by 30 June 2024, in place for the life of the Project.	NR	Alcoa has reserved the expected cost of the ITAG Chair in their budget for 2024. Conversation between JTSI and C Fraser (Alcoa) addressing the reconstitution of ITAG by the 30 th of June was reviewed. Alcoa understands JTSI is undertaking the procurement process, for which it is nearing completion. Evidence: <ul style="list-style-type: none"> Confirmation email of Alcoa's budget for the ITAG Chair dated 7th June 2024 Email confirming JTSI's procurement process is nearing the completion dated 6th June 2024

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
60-076783:M.6.25	Full Mining Cycle Planning and Cumulative Catchment Scale Risk Assessment	(25) Alcoa will, in consultation with the ITAG, develop agreed methodologies for a full mining cycle planning approach and cumulative catchment scale risk assessment, and submit these to the State Development Minister by 31 December 2024.	Alcoa will prepare draft methodologies for a full mining cycle planning approach and cumulative catchment scale risk assessment and undertake consultation with ITAG to refine and finalise the methodologies ahead of submission to the State Development Minister by 31 December 2024.	<u>Development of Methodology</u> a) Correspondence with ITAG in relation to the development of the methodology associated with: <ul style="list-style-type: none"> Full Mining Cycle Planning Approach Cumulative Catchment Scale Risk Assessment) b) Finalised methodology, incorporating feedback received from ITAG and other relevant stakeholders. <u>Submission</u> c) Written evidence of submission to the State Development Minister by 31 December 2024.	Overall	Submission by 31 December 2024.	NR	This condition is not yet required.
60-076783:M.6.26	Submissions of document in consultation with ITAG.	(26) Alcoa will consult with the ITAG to develop the following for submission to the State Development Minister by 31 December 2024, or at a later time as recommended by the ITAG and agreed by the State Development Minister: (a) a risk assessment methodology that enables appropriate avoidance and management measures to be implemented for all future clearing under the MMP; (b) a drainage design manual; and (c) a rehabilitation design manual.	Alcoa will prepare draft risk assessment methodology (aligned with the mitigation hierarchy principles), drainage design manual and rehabilitation design manual and undertaken consultation with ITAG to finalise the respective documents ahead of submission to the State Development Minister by 31 December 2024.	<u>Documentation:</u> a) Risk Assessment Methodology b) Drainage Design Manual c) Rehabilitation Design Manual <u>Submission and Consultation</u> d) Correspondence (including meeting minutes) with ITAG in relation to the development and refinement of the listed documents. e) Written Evidence showing the listed documents have been submitted to the State Development Minister by 31 December 2024.	Overall	Submission by 31 December 2024, or later if agreed by the State Development Minister.	NR	This condition is not yet required.
SECTION 7 - Monitoring								
60-076783:M.7.27	Appointment of Independent Qualified Party	(27) Alcoa must ensure that an independent qualified party undertakes monitoring capable of: (a) determining whether the limitations in conditions 5 and 9 are exceeded; and (b) determining whether the objectives of conditions 4 (a) and (b) have been met.	Refer Section 2.1 of this CAP for details of appointed Independent Qualified Person, and their agreed scope.	<u>Appointment of Independent Qualified Person:</u> a) Written correspondence confirming appointment, including details of their agreed scope of works in relation to their activities with monitoring compliance with the MMP.	Overall	For the life of the Project	C	Alcoa has engaged an independent qualified party (Ramboll Australia Pty Ltd) to undertake the monitoring. Evidence: <ul style="list-style-type: none"> Written agreement of the Scope of Work between Alcoa and Ramboll Written approval from the Minister for Energy, Environment and Climate Action

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
60-076783:M.7.28	Submission of Compliance Assessment Report	<p>(28) Alcoa must submit as part of the Compliance Assessment Report required by condition 32, a compliance monitoring report that:</p> <ul style="list-style-type: none"> (a) outlines what monitoring was undertaken of any activities carried out in accordance with condition 18 (b) and (c); (b) identifies why the monitoring was capable of substantiating whether the limitations in conditions 5 and 9 are exceeded; (c) identifies why the monitoring was scientifically robust and capable of determining whether all conditions have been met; (d) outlines the results of the monitoring and provides the data; and (e) reports whether the conditions have been met, based on analysis of the results of the monitoring. 	<p>Preparation of a Compliance Assessment Report (CAR) in accordance with this condition, and other relevant conditions of the MMP Approval. The CAR will incorporate, as Appendix A, a compliance monitoring report for the corresponding reporting period.</p> <p>The CAR will also be developed in alignment with requirements of <i>Post Assessment Guideline for Preparing a Compliance Assessment Report (OEPA, 2012)</i>.</p>	<p><u>Preparation of Compliance Monitoring Report</u></p> <ul style="list-style-type: none"> a) Compliance Monitoring Report, which will be provided as Appendix A of the respective Compliance Assessment Report (as per Section 2.3.3 of the CAP). 	Overall	For the life of the Project	C	<p>Compliance Monitoring Report has been presented as Appendix A of this CAR. This CAR has been prepared in accordance with requirements of <i>Post Assessment Guideline for Preparing a Compliance Assessment Report (OEPA, 2012)</i>.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Appendix A of this Compliance Assessment Report
SECTION 8 – Compliance, time limits, audits and other conditions								
60-076783:M.8.29	Incident Reporting	<p>(29) If Alcoa becomes aware of a failure of drainage, or discharge from containment infrastructure that includes any potentially environmentally hazardous material, Alcoa must:</p> <ul style="list-style-type: none"> (a) report this to the Department of Water and Environmental Regulation, the Water Corporation and the State Development Minister within 24 hours; (b) implement contingency measures; (c) investigate the cause; (d) investigate environmental impacts; (e) advise rectification measures to be implemented; (f) advise any other measures to be implemented to ensure no further impact; and (g) provide a report to the State Development Minister within twenty-one (21) calendar days of being aware of the potential non-compliance, 	<p>Implement processes to categorise and manage sump and containment control structures that have the potential to contain environmental hazardous materials. The environmental hazardous materials sampling program will, at a minimum, include the following:</p> <ul style="list-style-type: none"> • Hydrocarbons • PFAS compounds (refer below for detail) • Ethylene glycol <p>Implement monitoring, inspection, investigation/assessment and reporting processes to ensure timely identification, measurement, mitigation and reporting of drainage failure incidents or discharge from containment infrastructure that includes any potentially environmentally hazardous material.</p> <p><i>Note: Incidents that trigger the reporting requirements under this condition will be reported using the notification template provided as Appendix D of the CAP.</i></p> <p>PFAS Criteria Refer to PFAS Criteria specified in 60-076783:M.1.4.</p>	<p><u>Containment Structure / Sump Characterisation</u></p> <ul style="list-style-type: none"> a) Register of sumps and associated risk characterisation (high / medium / low) or equivalent. <p><u>Inspections</u></p> <ul style="list-style-type: none"> b) Routine inspections of high-risk sumps c) Completed Red Alert Checklists and inspections of high-risk areas. d) Completed pit inspection checklists of active pits and high-risk areas. <p><u>Notifications and Investigations</u></p> <ul style="list-style-type: none"> e) 24-hour notifications and associated 21-day Investigation Reports (submitted to DWER, Water Corporation and State Development Minister. f) Internal Event Reporting System 	Overall	For the life of the Project	C	<p>During field verification activities, wastewater treatment facilities and storage sumps, DAF holding sumps and stormwater management facilities were inspected. No evidence of environmentally hazardous materials leakage was noted.</p> <p>Risk-based classification of sumps is ongoing. Sumps without a current risk classification default to 'high risk' status to take a conservative approach.</p> <p>Drainage incidents (turbidity) were recorded during the monitoring period, including notification of events to DWER in the required timeframes. The resulting investigations concluded that these incidents were non-mining related, and this was reported to DWER in the 21-day investigation report.</p>

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
		detailing the measures required in conditions 29(a)-(f).						<p>Other turbidity events were recorded as false events, which upon investigation by Alcoa, were found to be due to low stream levels, algal growth on sensors, or debris accumulating around the monitor sensor. Field verification of sensors was undertaken to verify performance and suitability to obtain accurate records.</p> <p>Evidence:</p> <ul style="list-style-type: none"> Completed Red Alert Checklists Stream Water Quality and PFAS Ambient and Receiving Environment Sampling – Scope of Work Water Resource Management Plan GIS shapefiles of Huntly and Willowdale sumps Alcoa Incident Database records Huntly and Willowdale Turbidity Monitor Exceedance Events Register Event Notification Reports -HV16, SM08, HV08 submitted to DWER. Desktop checks and site verification activities as described in Table 6 by the independent compliance monitor.
60-076783:M.8.30	Determining further action required in response to non-compliance.	(30) Failure to comply with the requirements of a condition, constitutes a noncompliance with these conditions. The State Development Minister will consider the contingency measures, rectification or other measures immediately put in place by Alcoa to remedy the non-compliance, before determining further action in response to the non-compliance.	Noted.	Not Applicable.	Overall	For the life of the Project	NR	This condition is not yet required.
SECTION 9 – Compliance and monitoring reporting								

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
60-076783:M.9.31	Provision of surface and groundwater monitoring data	(31) Alcoa will ensure surface water and groundwater monitoring data collected in accordance with the relevant monitoring requirements detailed in condition 28, will be provided to the Department of Water and Environmental Regulation and Water Corporation as per a monitoring schedule agreed by those agencies.	Implement the surface water and groundwater monitoring programs, as per the approved Water Resources Management Plan. Undertaken consultation with the Department of Water and Environment Regulation and Water Corporation to agree on the monitoring schedule in which the monitoring data from the respective programs will be made available to them.	<u>Provision of Monitoring Data (surface and groundwater):</u> a) Formal consultation and correspondence with DWER and Water Corp in relation to the agreed monitoring schedule (which will be outlined and form part of the Water Resources Management Plan) b) Provision of Surface water and Groundwater monitoring data to DWER and Water Corp as per the agreed schedule.	Overall	For the life of the Project	NR	An agreed schedule has yet to be agreed between Alcoa, DWER and Water Corporation on the nature and timing of monitoring data provision. Refer to commentary for Condition 13 on the implementation status of the Water Resources Management Plan. Evidence: <ul style="list-style-type: none"> Communication emails between Alcoa, JTSI, DWER and Water Corp
60-076783:M.9.32	Submission of Compliance Assessment Report	(32) Alcoa must provide an annual Compliance Assessment Report to the State Development Minister for the purpose of determining whether the conditions in this MMP approval are being complied with.	Preparation of a Compliance Assessment Report (CAR) in accordance with this condition, and other relevant conditions of the MMP Approval. The CAR will also be developed in alignment with requirements of <i>Post Assessment Guideline for Preparing a Compliance Assessment Report (OEPA, 2012)</i> .	<u>Compliance Assessment Report/s:</u> a) Compliance Assessment Report/s for each reporting period. b) Record of submission of Compliance Assessment Plan to State Development Minister	Overall	For the life of the Project	C	This CAR was prepared and submitted to State Development Minister on or before the 20 th June 2024. Evidence: <ul style="list-style-type: none"> This CAR
60-076783:M.9.33	Submission of Compliance Assessment Report – timing	(33) Unless a different date or frequency is approved by the State Development Minister, the first annual Compliance Assessment Report must be provided within six (6) months of the date of the MMP approval, and subsequent reports must be provided annually from that date.	Preparation of a Compliance Assessment Report (CAR) in accordance with this condition, and other relevant conditions of the MMP Approval. The CAR will also be developed in alignment with requirements of <i>Post Assessment Guideline for Preparing a Compliance Assessment Report (OEPA, 2012)</i> .	<u>Compliance Assessment Report/s:</u> a) Compliance Assessment Report/s for each reporting period. b) Record of submission of Compliance Assessment Plan to State Development Minister	Overall	Due 20 June 2024.	C	This CAR was prepared and submitted to State Development Minister within six (6) months of the date of the MMP approval. Evidence: <ul style="list-style-type: none"> This CAR
60-076783:M.9.34	Endorsement (Alcoa) of Compliance Assessment Reports	(34) Each annual Compliance Assessment Report must be endorsed by a Director (as defined in the Corporations Act 2001) of Alcoa, or a person approved by a Director of Alcoa to be delegated to sign on behalf of the Director.	Implement an internal review and endorsement process in relation to the Compliance Assessment Report, including signoff process by a Director of Alcoa, or nominated delegate.	<u>Compliance Assessment Report/s:</u> a) Completed Approval / Signature block included on the submitted Compliance Assessment Report/s.	Overall	For the life of the Project	C	Signature block was incorporated in this CAR. Evidence: <ul style="list-style-type: none"> This CAR
60-076783:M.9.35	Content of Compliance Assessment Reports	(35) Each annual Compliance Assessment Report must: (a) state whether each condition has been complied with, including: i. the limitations in conditions 5 and 9; ii. requirements to implement the content of Drainage Control Management Plans or an approved management plan;	Preparation of a Compliance Assessment Report (CAR) in accordance with this condition, and other relevant conditions of the MMP Approval. The CAR will also be developed in alignment with requirements of <i>Post Assessment Guideline for Preparing a Compliance Assessment Report (OEPA, 2012)</i> .	<u>Compliance Assessment Report/s:</u> a) Compliance Assessment Report/s for each reporting period.	Overall	For the life of the Project	C	This CAR for reporting period 2023/2024 was prepared according to Condition 35 of the MMP approval. At the time of developing this CAR, a formal response on the approval of the CAP had not yet been received by the Minister. Evidence: <ul style="list-style-type: none"> This CAR

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
		iii. monitoring requirements; iv. implementation of contingency measures; v. requirements to implement adaptive management; and vi. reporting requirements; (b) include the results of any monitoring (inclusive of any raw data) that has been required under these conditions in order to demonstrate that the conditions have been met; (c) provide evidence to substantiate statements of compliance, or details of where there has been a non-compliance; (d) describe progress and status of any consultation undertaken to review and update management plans; (e) include the corrective, remedial and preventative actions taken in response to any potential non-compliance; (f) be provided in a form suitable for publication on Alcoa's website; and (g) be prepared and published consistent with the latest version of the Compliance Assessment Plan required by condition 36 which the State Development Minister has approved in writing satisfies the relevant requirements.						
60-076783:M.9.36	Preparation and submission of Compliance Assessment Plan	(36) Alcoa must prepare and submit to the satisfaction of the State Development Minister, a Compliance Assessment Plan at least two (2) months prior to the first Compliance Assessment Report required by condition 32.	Preparation of a Compliance Assessment Plan in accordance with Condition 37 and <i>Post Assessment Guideline for Preparing a Compliance Assessment Plan (OEPA, 2012)</i> .	<u>Compliance Assessment Report/s:</u> a) Compliance Assessment Plan (CAP) b) Record of submission of Compliance Assessment Plan to the State Development Minister.	Overall	Two (2) months prior to the first Compliance Assessment Report (date: 20 April 2024)	IP	The CAP was submitted to the State Development Minister on the 18 th of April 2024. At the time of developing this CAR, a formal response on the approval of the CAP had not been received by the Minister. Evidence: <ul style="list-style-type: none"> Submission letter – D Strange to Hon Roger Cook Minister for State Development. Compliance Assessment Plan – April 2024

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
60-076783:M.9.37	Content of Compliance Assessment Plan	<p>(37) The Compliance Assessment Plan must include:</p> <ul style="list-style-type: none"> (a) details of the independent qualified person engaged to undertake monitoring under condition 28; (b) what, when and how information will be collected and recorded to assess compliance; (c) the methods which will be used to assess compliance; (d) the methods which will be used to validate the adequacy of the compliance assessment to determine whether the conditions outlined in this condition set are being complied with; (e) the retention of previous compliance assessments; (f) the table of contents of Compliance Assessment Reports, including audit tables; and (g) how and when Compliance Assessment Reports will be made publicly available. 	Preparation of a Compliance Assessment Plan in accordance with this condition and <i>Post Assessment Guideline for Preparing a Compliance Assessment Plan (OEPA, 2012)</i> .	<p><u>Compliance Assessment Report/s:</u></p> <ul style="list-style-type: none"> a) Compliance Assessment Plan (CAP) 	Overall	For the life of the Project	IP	<p>The CAP was submitted to the Minister for State Development on the 18th of April 2024. At the time of developing this CAR, a formal response on the approval of the CAP had not been received by the Minister.</p> <p>Ramboll has reviewed the submitted CAP and is satisfied that it meets the requirements describe in points (a) – (g) of this condition.</p> <p>Formal approval of the CAP by the Minister is required prior to making this finding compliant.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Submission letter – D Strange to Hon Roger Cook Minister for State Development. • Compliance Assessment Plan – April 2024
SECTION 10 – Public Availability of Data								
60-076783:M.10.38	Publishing of Content on company website	<p>(38) Alcoa must make the following documents publicly available on its website:</p> <ul style="list-style-type: none"> (a) any Mining and Management Plan, accompanying appendices and associated approval conditions, within seven (7) calendar days of receiving notice requiring publication from the State Development Minister; (b) any Management Plan required in accordance with Conditions 13-17 within twenty (21) business days of being implemented, or being required to be implemented (whichever is earlier); (c) any Compliance Assessment Report or other report required to be produced by these conditions within sixty (60) days of being provided to the State Development Minister; and (d) all geospatial data relevant to the MMP approval. 	All information and reports required to be published associated with this condition will be made publicly available on Alcoa’s website.	<p><u>Public Availability of listed documents:</u></p> <ul style="list-style-type: none"> a) Public availability of information required by the MMP Approval will be available at the link (Alcoa - Australia News - Reports and Publications) or equivalent. 	Overall	Per timeframes listed in the table.	C	<p>Documents related to Condition 38 (a) - (d) and Management Plans mentioned in Condition 13 are publicly available on company’s website. The revised and new Management Plans (Condition 17) will be made publicly available within the given timeframe (Condition 38 (b)).</p> <p>It is anticipated that this CAR will be made publicly available within 60 days of being provided to the State Development Minister.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Documents are publicly available via the link: Alcoa -- Australia News - Reports and Publications

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further information
60-076783:M.10.39	Withheld information from company website	<p>(39) If any information or data referred to in condition 38 contains:</p> <p>(a) Copyright material;</p> <p>(b) trade secrets; or</p> <p>(c) confidential information (other than trade secrets) that has commercial value to a person that would be, or could reasonably be expected to be, destroyed or diminished if the confidential information were published,</p> <p>Alcoa may submit a request for approval from the State Development Minister to not make this information or data publicly available and the State Development Minister may agree to such a request if the State Development Minister is satisfied that the information or data meets the above criteria.</p>	Managed on case-by-case basis.	<p><u>Management of Sensitive Data/Information:</u></p> <p>a) Written requests to the State Development Minister to not make certain information or data publicly available, including sufficient justification for the request.</p>	Overall	For the life of the Project	NR	This condition is not yet required.
60-076783:M.10.40	Withheld information from company website	<p>(40) In making a request under condition 39, Alcoa must provide the State Development Minister with an explanation and reasons why the data should not be made publicly available.</p>	Managed on case-by-case basis.	<p><u>Management of Sensitive Data/Information:</u></p> <p>a) Written requests to the State Development Minister to not make certain information or data publicly available, including sufficient justification for the request.</p>	Overall	For the life of the Project	NR	This condition is not yet required.

Appendix C
Identified potential non-compliances within the reporting
period 2023/2024

Potential Non-Compliance Reporting		
SECTION 1 – Preliminary Details		
Description of the Potential Non-Compliance	Location¹	
	Relevant Condition/s	
Details of immediate action/s taken by Alcoa in response to the potential non-compliance		
SECTION 2 – Investigation Outcomes		
Cause/s of the Potential Non-Compliance		
Details of Remedial and/or Corrective Action(s) taken, or proposed to be undertaken		
Description	Status	Target Completion Date
Details of measures that were in place to prevent the potential non-compliance, and what amendments (if any) have been made to the measures to prevent reoccurrence		
Measures in Place	Amendments (if any) made to prevent reoccurrence	

¹ Map showing precise location of the potential non-compliance is to be appended to the report, where appropriate.

Appendix D Compliance monitoring procedure

Alcoa s6 / MMP Compliance Monitoring Procedure

Purpose

The purpose of this monitoring procedure is to provide guidance on the key steps for undertaking compliance monitoring of Alcoa’s mining and exploration activities against conditions stipulated in its s6 *Environmental Protection (Darling Range Bauxite Mining Proposals) Exemption Order 2023 (SL2023/200)*, issued under the *Environmental Protection Act 1986 (EP Act)*, and the 2023 - 2027 Mining and Management Program (MMP) (2023-2027 MMP Approval, ref: 60- 076783), which covers Alcoa’s proposed exploration and mining operations for Huntly and Willowdale mines within ML1SA.

This procedure describes the steps required for:

- Accessing and storing data supplied by Alcoa;
- Assessing data to evaluate compliance;
- Selecting sites for field verification;
- Undertaking field verification; and
- Reporting to Alcoa.

The s6 and MMP compliance monitoring occurred weekly until April 2024, increasing to three times per week in May and five days per week in June. The key tasks are to be carried out on a weekly basis no later than shown in **Table 1**. The steps to carry out each task are described in Sections 1 to 4. Ramboll also has an obligation to monitor against the MMP more broadly, which is addressed in Appendix A.

Table 1 s6 / MMP compliance monitoring tasks

Task	Day				
	Mon	Tue	Wd	Thu	Fri
Receive data from Alcoa and save					
Evaluate data					
Select field sites and send jobsheet to Alcoa					
Inspect field sites					
Write up compliance evaluation					

Send weekly RFI to Alcoa via KPMG					
Provide weekly update to Alcoa					

1. Acquiring and storing data

Step	Description
1.1	<p>1.1.1 On the Friday preceding data acquisition, update the Request for Information (RFI) checklist and send it to KPMG to coordinate data acquisition (cc Alcoa):</p> <p><i>Note: The RFI is to be sent as early as possible on Fridays and by midday at the latest. The weekly FRI template is located on the Ramboll server.</i></p>
1.2	<p>1.2.1 By COB Tuesday, Alcoa is expected to have updated the RFI folders via parcelpost. ParcelPost - Ramboll RFI - All Documents (sharepoint.com)</p> <p>When received, save the RFI checklist data to Ramboll's server.</p> <p>1.2.2 The RFI checklist data is to be saved at two locations:</p> <ul style="list-style-type: none"> 'As received' This data is an archive of data as received, to be used as a reference source if needed. This data is not to be manipulated or changed in any way. Each week, the data is to saved in a folder labelled with the 'week commencing' date to which the data applies (e.g. WC_20240129). 'Working data': This data is to be used for undertaking the various data assessments and evaluations as necessary. Each week, the data is to saved in a folder labelled with the 'week commencing' date to which the data applies (e.g. WC_20240129). <p><i>Note: The updated Black Cockatoo Nest Trees and Significant Trees GIS database received monthly from Alcoa to update the basemap template is to also be saved 'As Received' with naming labelled with the date (eg. 20240129):</i></p>
1.3	<p>1.3.1 File the email in the data received folder for each month so that a record of this is stored.</p>
1.4	<p>1.4.1 Update the GIS_Shapefile_Register saved on the alcoa teams page.</p>

2. Evaluating compliance

Step	Description
2.1	<p>2.1.1 The s6 Monitoring Basemap has been developed for the purposes of conducting weekly data assessments.</p> <ul style="list-style-type: none"> The basemap is called: Basemap_Template.aprx

Step	Description
	<ul style="list-style-type: none"> • The basemap is located on the Ramboll server <p>The basemap contains the following GIS files:</p> <ul style="list-style-type: none"> • Huntly and Willowdale Mine Pit boundaries (provided by Alcoa); • Huntly Turbidity Monitor locations (provided by Alcoa); • Huntly Mine Disturbance Footprint (provided by Alcoa); • Huntly Mine Native Vegetation Disturbance Footprint (provided by Alcoa); • Willowdale Mine Disturbance Footprint (provided by Alcoa); • Exploration Disturbance Footprint (provided by Alcoa); • Forest Clearing Advice Areas (relinquished) (provided by Alcoa); • Reservoir Top Water Level 1km Buffer (provided by Alcoa); • Serpentine Pipehead Dam Catchment Area (provided by Alcoa); • Black Cockatoo Nesting and Significant Trees* (provided by Alcoa); • Reservoir Protection Zones (RPZ) (provided by Alcoa); and • Mount Solus 1.5km buffer (provided by Alcoa); • Slope Analysis >16% at 5m resolution (calculated by Ramboll from derived from Landgate-supplied 5m Digital Elevation Model). <p><i>Note: The intent with the Basemap is to add the weekly RFI checklist data and conduct GIS-based evaluation of compliance against the compliance s6 compliance conditions presented in the Compliance Assessment Plan (CAP). The key conditions for monitoring are those listed in the RFI in Appendix A.</i></p> <p><i>*As Black Cockatoo Nesting and Significant Trees data will have to be updated monthly in the basemap. 10m buffer (50 m buffer if within the 2023a fca area) will also have to be added around the point data.</i></p> <p><i>This is done through:</i></p> <ol style="list-style-type: none"> 1. <i>Selecting view on the top ribbon</i> 2. <i>Select geoprocessing</i> 3. <i>Search for buffer</i> 4. <i>In input features select the 'Black_Cockatoo_Nest_and_Sig_Trees' layer.</i> 5. <i>In output feature class select the area file is to be saved and specify the file name ('Black_Cockatoo_Nest_and_Sig_Trees_10m_Buffer_yyyymmdd')</i>

Step	Description
	<p>2.1.2 Open the s6 Monitoring Basemap and save it as an ArcGIS Project.</p> <ul style="list-style-type: none"> • Save the ArcGIS Project • Save using the following naming convention: [WC_yyyymmdd_S6_compliance] • Add the RFI checklist spatial data to the ArcGIS Project in order to conduct data evaluations and save the ArcGIS Project. Save this in a new group layer within Arcgis entitled RFI_yyyymmdd • Convert RFI checklist spatial data to Geodatabase format. To do this, right click layer, data, export features, under the output feature class in the dialog box select the working directory. On the environment tab, make sure that the data is in the correct projection (this can be done by selecting current map projection which is GDA2020 MGA Zone 50) : Data should be saved within the S6 Geodatabase in the applicable feature dataset eg. Drainage data is saved in drainage and stabilisation feature dataset. <ul style="list-style-type: none"> ➢ Follow naming conventions in the folders noting that for GDPs, the site goes first then the date goes immediately after the site, followed by the pre-existing .shp name. eg. Huntly_20240129_Clinton_Access_Buffer_Low ➢ All received data should be included in the GIS_Shapefile_Register under the 'Received data' sheet. • IF data is provided that will form part of the basemap, this should be saved in the S6_Constraints feature dataset. It should also be updated in basemap_template.aprx to ensure it will be captured in future weeks. All new received data for the basemap should be included in the GIS_Shapefile_Register underthe 'Basemap Template' sheet. <p><i>Note: a new ArcGis Project will be created each week i.e. one for each week's data evaluation.</i></p>
2.2	<p>2.2.1 s6 Condition 2(2) and 2(3) compliance.</p> <p>In the ArcGIS Project, check approved and completed Ground Disturbance Permits (GDPs) and Survey Reconciliations against the:</p> <ul style="list-style-type: none"> • Huntly Mine Disturbance Footprint; • Huntly Mine Native Vegetation Disturbance Footprint S6_2_2ab_Mining_Activities_Huntly_Basemap • Willowdale Mine Disturbance Footprint. S6_2_3ab_Mining_Activities_Willowdale_Basemap <p>Also review the Huntly and Willowdale planning meeting minutes to check for any potential works outside of the approved disturbance footprints.</p> <p>Also review Sentinel-2 satellite imagery to identify newly cleared areas. Sentinel-2 satellite imagery is available via the Sentinel Hub on the Copernicus website: Copernicus Data Space Ecosystem Europe's eyes on Earth</p> <p>Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).</p> <ul style="list-style-type: none"> • The Weekly s6 Compliance Findings Datasheet template is located on the Ramboll server.

Step	Description
	<p>2.2.2 s6 Condition 2(4). Access the Alcoa s6 Exploration Portal and check weekly completed exploration drill hole locations, and approved and completed Ground Disturbance Permits (GDPs) against the:</p> <ul style="list-style-type: none"> • Exploration Disturbance Footprint. S6_2_4_Darling_Range_Exploration_Disturbance_Footprint_Basemap <p>Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).</p>
	<p>2.2.3 s6 Condition 2(5). Review the following mining production data for Huntly and Willowdale against production limits:</p> <ul style="list-style-type: none"> • mass of ore crushed per week; • end-of-month reconciliation of ore crushed against forecast (when available). <p>Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B). Summed total amounts from willowdale and huntly are saved within the teams page as YDTONNES.xls Generally this is done at the end of the month to save time.</p>
	<p>2.2.4 s6 Condition 2(6). Review the following exploration data against drill-hole limits:</p> <ul style="list-style-type: none"> • weekly drilling report; • end-of-month reconciliation of holes drilled against forecast (when available). • .shp of drilling holes for applicable month. <p>Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B). Summed total amounts from willowdale and huntly are saved in the teams page as exploration drill holes to date.xls</p>
	<p>2.2.5 s6 Condition 3 In the ArcGIS Project, check Huntly and Willowdale approved and completed GDPs, and Survey Reconciliations against the relinquished Forest Clearing Advice Areas GIS layer (S6_3_2_Forest_Clearing_Advice_Area_Basemap) Review the shapefile of monthly exploration drill holes against the relinquished Forest Clearing Advice Areas GIS layer and exploration footprint (S6_3_2_Forest_Clearing_Advice_Area_Basemap) Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).</p>

Step	Description
	<p>2.2.6 s6 Condition 4(2)(a) / MMP Condition 5</p> <p>In the ArcGIS Project, check Huntly and Willowdale approved and completed GDPs, and Survey Reconciliations against the Reservoir Protection Zone (RPZ) 1km Buffer GIS layer (S6_4_2abcde_Basemap)</p> <p>Review the shapefile of monthly exploration holes against the Reservoir Protection Zone (RPZ) 1km Buffer GIS layer (S6_4_2abcde_Basemap)</p> <p>Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).</p> <p>Access sentinel 2 at this link: https://apps.sentinel-hub.com/eo-browser/?zoom=10&lat=41.9&lng=12.5&themeId=DEFAULT-THEME&toTime=2024-03-13T06%3A03%3A31.275Z</p> <p>Review sentinel 2 aerial imagery via the timelapse function. Do this by selecting area of interest in map (willowdale or huntly area- search address), create timelapse animation, visualise, (select true colours option), select dates of the week of interest (include a day from the previous week for comparison), select images that are not obstructed by cloud colour then create timelapse. See previous examples for spatial extent of mine covered.</p> <p>Download and save imagery within the applicable working files folder within the clause 4 folder. Create a new file entitled Sentinel 2 Imagery. Save timelapse files as huntly and Willowdale.</p>
	<p>2.2.7 s6 Condition 4(2)(b)) / MMP Condition 5</p> <p>In the ArcGIS Project, check Huntly and Willowdale approved and completed GDPs, and Survey Reconciliations against the Serpentine Pipehead Dam Catchment Area GIS layer.</p> <p>Review the shapefile of monthly exploration holes against the Serpentine Pipehead Dam Catchment Area GIS layer. (S6_4_2abcde_Basemap)</p> <p>Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).</p>
	<p>2.2.8 s6 Condition 4(2)(c)) / MMP Condition 5</p> <p>In the ArcGIS Project, check Huntly and Willowdale approved and completed GDPs, and Survey Reconciliations against the RPZ + Average Slope > 16% GIS layer.</p> <p>Review the shapefile of monthly exploration holes against the RPZ + Average Slope > 16% GIS layer. (S6_4_2abcde_Basemap)</p> <p>Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).</p>
	<p>2.2.8 s6 Condition 4(2)(d)) / MMP Condition 4 (a) and 5</p> <p>In the ArcGIS Project, check Huntly and Willowdale approved and completed GDPs, and Survey Reconciliations against the Black Cockatoo Nesting and Significant Trees GIS layers (S6_4_2abcde_Basemap)</p> <p>Review the locations of monthly exploration holes against the Black Cockatoo Nesting and Significant Trees GIS layer.</p> <p>Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).</p>

Step	Description
	<p>2.2.9 s6 Condition 5(2) / MMP Condition 4 (b)</p> <p>Review Huntly and Willowdale rehabilitation plans and schedule, land stabilisation plans and schedule, drainage plans for active areas and survey reconciliations of post-stabilisation / post-rehabilitation landforms against drainage plans.</p> <p>Review Exploration completed drill hole checklists and Exploration incident records relating to rehabilitation or drainage (if any).</p> <p>Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).</p> <p><i>Note: It is probable that findings cannot be completed until a site inspection of high risk areas has been conducted. Therefore, it is most likely that the reviews above will be used primarily to identify high risk areas for field verification.</i></p>
	<p>2.2.9 s6 Condition 5(3) and 5(4)</p> <p>In the ArcGIS Project, check Huntly and Willowdale approved and completed GDPs, and Survey Reconciliations against the Reservoir Protection Zones (RPZ) and Mount Solus 1.5km buffer GIS layers (S6_5_3ab_Basemap)</p> <p>Review the shapefile of monthly exploration holes against the Reservoir Protection Zones (RPZ) and Mount Solus 1.5km buffer GIS layers (S6_5_3ab_Basemap).</p> <p>Review Huntly and Willowdale rehabilitation plans and schedule, land stabilisation plans and schedule, drainage plans for active areas and survey reconciliations of post-stabilisation / post-rehabilitation landforms against drainage plans.</p> <p>Review Exploration completed drill hole checklists.</p> <p>Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).</p> <p><i>Note: It is probable that findings cannot be completed until a site inspection of high risk areas has been conducted. Therefore, it is most likely that the reviews above will be used primarily to identify high risk areas for field verification.</i></p>
	<p>2.2.10 s6 Condition 6(2)</p> <p>Review Huntly and Willowdale water turbidity data.</p> <p>Review drainage incident records:</p> <ul style="list-style-type: none"> • Incident Register summary records; • 24 hour incident notification records; • 21 day incident investigation reports; • GIS records of drainage exit points; • Survey data of mud/slurry releases to the environment. <p>Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).</p> <p><i>Note: All incident locations should be inspected in the field.</i></p>

3. Selecting field verification sites and conducting field verifications

Step	Description
3.1	<p>3.1.1. Our approach to selecting sites for field verification is based on risk i.e. the risk of environmental harm occurring and/or the risk of a non-compliance with an s6 or MMP condition occurring, even if it does not result in environmental harm.</p> <p>Appendix D provides a risk profile for Alcoa’s activities in various environmental settings. Some environmental settings relate to site-specific prohibited or restricted activities (e.g. activities near or in FCA areas, RPZs) and some relate to environmental conditions such as the presence of shallow groundwater or rainfall events.</p> <p>The selection of field verification sites for testing compliance (as detailed below) should have regard to the risk profile and monitoring frequency outlined in Appendix D.</p>
3.2	<p>3.2.1. s6 Condition 2(2), 2(3) and 2(4) compliance.</p> <p>If during the evaluation of compliance, mining or exploration activities are detected close-to or outside of the approved disturbance footprints, the sites should be selected for field verification.</p> <p>Record these sites in the Weekly s6 / MMP Field Verification Datasheet (Appendix C).</p> <ul style="list-style-type: none"> • The Weekly s6 Field Verification Datasheet template is located on the Ramboll server. • This can be uploaded for access on the tablet by sending to google drive of either ramboll gmail account. To access on the tablet, open from the google drive and the document should automatically open in Microsoft word. Save in the onedrive folder under the folder field verification sheets. Observations can be typed on the tablet in the field. This can then be opened on pc by logging into the onedrive account. Observations can then be directly copied into the compliance findings worksheet. • Note if you cannot save in the onedrive file, save in the tablets’ ‘my documents’ folder under field verification sheets and once filled with field observations the file can be shared via email.
	<p>3.2.2 s6 Condition 3</p> <p>If during the evaluation of compliance, mining or exploration activities are detected close-to or inside the relinquished Forest Clearing Advice Areas GIS layer, the sites should be selected for field verification.</p> <p>Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).</p>
	<p>3.2.3 s6 Condition 4(2)(a)) / MMP Condition 5</p> <p>If during the evaluation of compliance, mining or exploration activities are detected close-to or inside the Reservoir Protection Zone (RPZ) 1km Buffer GIS layer, the sites should be selected for field verification.</p> <p>Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).</p>

Step	Description
3.2.4	<p>s6 Condition 4(2)(b)) / MMP Condition 5</p> <p>If during the evaluation of compliance, mining or exploration activities are detected close-to or inside the Serpentine Pipehead Dam Catchment Area GIS layer, the sites should be selected for field verification.</p> <p>Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).</p>
3.2.5.	<p>s6 Condition 4(2)(c)) / MMP Condition 5</p> <p>If during the evaluation of compliance, mining or exploration activities are detected close-to or inside the RPZ + Average Slope > 16% GIS layer, the sites should be selected for field verification.</p> <p>Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).</p>
3.2.6	<p>s6 Condition 4(2)(d) / MMP Condition 5</p> <p>If during the evaluation of compliance, mining activities are detected close-to or inside the 10m buffer zones of the Black Cockatoo Nesting and Significant Trees GIS layer, the sites should be selected for field verification.</p> <p>For Exploration activities, select a sub-sample of exploration drill holes for field verification of cockatoo tree buffer distances.</p> <p>Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).</p> <p><i>Note: Approximately 2000 exploration holes are drilled per week. Therefore, exploration drill holes can be sub-sampled on a fortnightly basis for field verification.</i></p>
3.2.7	<p>s6 Condition 5(2)</p> <p>The sites selected in steps 3.1.3 to 3.1.6 for field verification in relation to Conditions 4(2)(a) to 4(2)(d) would also address Condition 5(2).</p> <p>Any additional high-risk sites noted during the evaluation of compliance e.g. steep gradients or gradients towards surface water drainage lines, can also be added to the Weekly s6 Field Verification Datasheet (Appendix C).</p> <p>These sites need to be inspected for adequate stabilisation and drainage control, and, if rehabilitated, verification of as-built landform and drainage against the relevant landform and drainage design.</p>
3.2.8	<p>s6 Condition 5(3) and 5(4)</p> <p>If during the evaluation of compliance, mining or exploration activities are detected close-to or inside the Reservoir Protection Zones (RPZ) and Mount Solus 1.5km buffer GIS layers, the sites should be selected for field verification.</p> <p>Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).</p>
3.2.9	<p>s6 Condition 6(2)</p> <p>All incident locations should be inspected in the field.</p> <p>Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).</p>

Step	Description
3.3	<p data-bbox="268 327 1410 427">3.3.1 Prior to undertaking the field-based verification, send the Weekly s6 Field Verification Datasheet to the Alcoa team (listed in step 1.1.2) to provide advance notice of Ramboll’s intended inspection locations.</p> <p data-bbox="363 443 1299 510">Send a GIS file of the intended inspection locations with the Weekly s6 Field Verification Datasheet.</p> <p data-bbox="363 526 1398 593">Also send the Job Safety Analysis (JSA). A separate, updated JSA must be prepared and submitted for each weekly field inspection.</p> <p data-bbox="268 609 1270 631"><i>Note: Alcoa has advised that Ramboll personnel are to be escorted whilst on site.</i></p>

Step	Description
	<p>3.3.2 Upload the Basemap layers (see step 2.1.1) and intended inspection locations (see step 3.2.1) onto Google Earth and the field tablets to enable site-based verification of locations, proximity to sensitive receptors e.g. Cockatoo Nesting and Significant Trees.</p> <p>To convert a layer on arcgis to google earth, go to geoprocessing tools, conversion tools, layer to KML..KMZ files. Opening the file on the tablet will load the file to google earth pro.</p> <p>3.3.2.1 To upload the chosen sites to Avenza, first zoom to the pit of interest (zoom needs to have the pit of interest covering at least 20% of the screen pit otherwise pdf zoom won't be high enough resolution) on the basemap and select relevant layers for inclusion on the avenza map. On the top ribbon, go to insert and then select new layout.</p> <p>3.3.2.2 In the new layout, select map frame on the top ribbon and scroll to the basemap map and input into the layout. Multiple layouts may need to be created (eg. if pits are far apart from each other)</p> <p>3.3.2.3 To export as a georeferenced pdf, on the top ribbon go to share, and choose export layout. Choose the export as GeoReferenced PDF. On the pop-out tab, select max quality.</p> <p>3.3.2.4 Click export and save pdf in a new folder entitled WC_yyyymmdd. Save file as avenza_yyyymmdd _pitname (yyymmdd referring to day of site visit)</p> <p>3.3.2.4 Upload file to the google drive for either email address and download on tablet.</p> <p>Open the file within google drive on the tablet in avenza maps. Create a new folder entitled yyyymmdd and save the file within this.</p> <p>Upload the fieldsheets word document to the google drive and open in onedrive on the tablet. Save in the fieldsheets folder.</p> <p>Other items required for field verification include:</p> <ul style="list-style-type: none"> • Montana 700i GPS • Hard hat • Safety glasses/ safety sunglasses • Alcoa swipe card • Alcoa Environment Health and Safety Directory (blue booklet) • Tablet for Avenza maps visualisation • Weekly s6 Field Verification Datasheet printed • JSA printed

Step	Description
	<p>3.3.3 During site verifications, the following aspects are to be noted on the Weekly s6 Field Verification Datasheet:</p> <ul style="list-style-type: none"> • clearing beyond demarcated clearing boundaries; • water/mud/contaminant release to the surrounding environment; • erosion extending into the surrounding environment; • <10m proximity to a Cockatoo Nesting or Significant Tree; • exploration drill holes not adequately plugged (potential hazard to fauna); • exploration drill holes not adequately rehabilitated (erosion risk). <p>Additional notes are to be entered onto the Weekly s6 Field Verification Datasheet as required.</p> <p>Mark any pertinent observations e.g. erosion, loss of containment and so forth, on the Montana 700i GPS.</p>
	<p>3.3.4 Alcoa is to be notified of any observed potentially non-compliant activities both verbally (immediately) and in writing (as soon as practicable).</p>
	<p>3.3.5 Completed Weekly s6 Field Verification Datasheets are to be scanned and saved onto the X:drive. If the field verification datasheet was edited on the tablet, download the file and save to the below folder.</p> <ul style="list-style-type: none"> • The location for saving Weekly s6 Field Verification Datasheets is on the Ramboll server. The naming convention to be used for labelling Weekly s6 Field Verification Datasheets is: [yyyymmdd_S6 Field Verification • Field verification photos are to be saved in the 8. Mon. data folder • Relevant files received from site are also to be saved in the 8. Mon. data folder
	<p>3.3.6 Upon completing the field verification, update the findings recorded in the relevant Weekly s6 Compliance Findings Datasheet.</p>
	<p>3.3.7 Upload tracking and waypoint data recorded on the Montana 700i GPS to the map template for this week. Access files from the "GPX" file when the GPS is plugged into laptop. Save .gpx files within the newly created weekly map template</p> <p>Upload and save any screenshots of areas of interest from ArcGIS in the workingdata file for the current week under the relevant clause.</p>
	<p>3.3.8 .gpx files can be uploaded to the weekly map template by using the gpx to features tool in geoprocessing tools. Choose output type as tracks as polylines for tracking or point for waypoints created.</p> <p>3.3.8.1 tracks created in Avenza can be exported to gpx for comparison with Garmin tracks. To do this, access layers on the bottom right corner of the map of interest, click the three dots on the track and select export. Select GPX as the export format and share through email.</p> <p>3.3.8.2 Save gpx files in the ArcGIS project under a new group with the name sites checked_yyyymmdd</p>

Step	Description
	<p>3.3.9 Sites viewed should be added to the Register of Sites visited</p> <p>*Please note that some pits may not be captured in the register of sites visited, but may be in the ArcGIS basemap. This is because the register was created before all pit names and shapefiles were supplied. Please add new pit names to the register as they are visited for site inspection.</p> <p>Add any turbidity monitors viewed as well as any other locations at bottom rows of the register.</p>

4. Reporting

Step	Description
4.1	<p>4.1.1. Weekly reporting: a one-hour weekly 'Teams' meeting is held with Alcoa each Friday at 1:30pm.</p> <p>Aspects to be discussed include:</p> <ul style="list-style-type: none"> • Activities undertaken by Ramboll during the week; • Overview of findings; • Overview of budget status; • Any other aspects relating to process, data quality, or logistical constraints. <p>Minutes are to be taken and issued to all attendees at the end of the meeting.</p> <p>Send any site observations attached to the meeting minutes and update them in the Site observations register saved in the Alcoa teams page. To get photos to fit in the cell, right right click photo, select format picture. Under properties, make sure move and size with cells is selected.</p> <p>Once updated with the weeks observations, upload the Site observations register to the Sharepoint.</p>
4.2	<p>4.2.1. Monthly reports are to be prepared summarising the findings of the preceding calendar month (i.e. 1st day of the month to the last day of the month, inclusive).</p> <ul style="list-style-type: none"> • The s6 Monthly Compliance Report template is located on the Ramboll server. <p>The s6 Monthly Compliance Report will summarise the findings recorded on the relevant Weekly s6 Compliance Findings Datasheet.</p> <hr/> <p>3.1.2 Monthly reports are to be prepared according to the following schedule:</p> <ul style="list-style-type: none"> • DRAFT s6 Monthly Compliance Report is to be issued to Alcoa by the 8th day of each month; • FINAL s6 Monthly Compliance Report is to be sent to the CEO, DWER by the 15th day of each month.

Appendix A RFI checklist template

The RFI is comprised of two parts: the first part colour-coded green addressing monitoring required against the s6 Exemption conditions and the second part colour-coded orange addressing the MMP Approval conditions.

Note that compliance with the s6 Exemption Conditions is required weekly, the MMP Approval Conditions monthly.

Appendix B s6 / MMP Compliance Findings Datasheet

The **s6 / MMP Compliance Findings Datasheet** is comprised of two parts: the first part colour-coded green addressing monitoring required against the s6 Exemption conditions and the second part colour-coded orange addressing the MMP Approval conditions.

This has been done so that all of the monitoring observations for both the s6 Exemption and the MMP Approval Conditions are in the one location.

Note:

- s6 reports are required monthly and would summarise all of the observations recorded in the **s6 / MMP Compliance Findings Datasheet** in each week during on the monthly.
- MMP Reports are required quarterly and would summarise all of the observations recorded in the past three months worth of **s6 / MMP Compliance Findings Datasheets**.

Appendix C s6 / MMP Field Verification Job Sheet

When creating the list of sites to visit in the Field Verification Job Sheet, also check the **Register of Sites Visited** to avoid doubling-up unnecessarily or, conversely, for following up on high-risk sites that may need further verification. The **Register of Sites Visited** is to be updated:

Appendix D Huntly and Willowdale Risk Profile and Monitoring Frequency

Alcoa Activity	Site / Environmental Characteristics										
	Prohibited Activity Areas	Restricted Activity Areas						Elevated Risk Conditions		Other Areas	
	Adjacent to FCAs	Within Reservoir Top Water Level 1km buffer	Within Serpentine Pipehead Dam Catchment	Within Reservoir Protection Zone + >16% gradient	Within Reservoir Protection Zone	Within Mt Solus 1.5km buffer	Black Cockkatoos Trees / Significant Trees within or adjacent to area	Ponding shallow groundwater present	When rainfall >20mm forecast or received	Elsewhere in s6 or MMP area	Recorded Incidents
Huntly											
Open areas with Drainage Storage Capacity < 50%	N/A	H	H	H	H	H	N/A	VH	VH	H	VH
Stabilisation / construction of drainage control	N/A	H	H	H	H	H	N/A	VH	VH	M	VH
New clearing	VH	M	M	M	M	M	VH	N/A	H	M	VH
Use / maintenance of existing mining infrastructure	N/A	M	M	M	M	M	M	H	H	L	VH
Rehabilitation (backfilling, shaping, topsoiling, ripping)	N/A	M	M	M	M	M	M	M	H	L	VH
Exploration	L	M	M	M	M	M	M	M	H	L	VH
Turbidity monitoring sensors	N/A	M	M	M	M	M	N/A	N/A	H	N/A	VH
Other disturbance (e.g. monitoring bore installation)	N/A	M	M	M	M	M	H	M	M	L	VH

Alcoa Activity	Site / Environmental Characteristics										
	Prohibited Activity Areas	Restricted Activity Areas						Elevated Risk Conditions		Other Areas	
	Adjacent to FCAs	Within Reservoir Top Water Level 1km buffer	Within Serpentine Pipehead Dam Catchment	Within Reservoir Protection Zone + >16% gradient	Within Reservoir Protection Zone	Within Mt Solus 1.5km buffer	Black Cockatoo Trees / Significant Trees within or adjacent to area	Ponding shallow groundwater present	When rainfall >20mm forecast or received	Elsewhere in s6 or MMP area	Recorded Incidents
Willowdale											
Open areas with Drainage Storage Capacity < 50%	N/A	H	N/A	H	H	N/A	N/A	VH	VH	H	VH
Stabilisation / construction of drainage control	N/A	H	N/A	H	H	N/A	N/A	VH	VH	M	VH
New clearing	VH	M	N/A	M	M	N/A	VH	N/A	H	M	VH
Use / maintenance of existing mining infrastructure	N/A	M	N/A	M	M	N/A	M	H	H	L	VH
Rehabilitation (backfilling, shaping, topsoiling, ripping)	N/A	M	N/A	M	M	N/A	M	M	H	L	VH
Exploration	L	M	N/A	M	M	N/A	M	M	H	L	VH
Turbidity monitoring sensors	N/A	M	N/A	M	M	N/A	N/A	N/A	H	N/A	VH
Other disturbance (e.g. monitoring bore installation)	N/A	M	N/A	M	M	N/A	H	M	M	L	VH

Risk Ranking / Inspection Priority	Field Verification Frequency
Very High	Inspect representative sites each week
High	Inspect representative sites each week
Moderate	Inspect representative sites every two to four weeks
Low	Inspect representative sites at least every four weeks
N/A	Not applicable – activity not prohibited, restricted, does not occur at that location within s6 area or is not a direct risk factor

Appendix E Compliance monitoring raw data – assessment sheets

MMP Compliance Findings Worksheet February 2024

Condition	Week 1 Date: 29/01 - 4/02/24 (field inspection date 8 th February)	Week 2 Date: 05/02 - 11/02 (field inspection date 15 th February)	Week 3 Date: 12/02-18/02 (field inspection date 22 nd February)	Week 4 Date: 19/02-25/02 Field inspection (29 th February)
4. Environmental Objectives				
60-076783:M.1.4 (4) Any clearing, exploration, mining, or other operations permitted by this MMP approval must be implemented by Alcoa to meet the following environmental objectives: (a) avoiding or otherwise minimising clearing within 50 metres of Black Cockatoo nesting trees	Refer to 5 (d) for monitoring process	Refer to 5 (d) for monitoring process	Refer to 5 (d) for monitoring process	Refer to 5 (d) for monitoring process
(b) avoiding or otherwise minimising discharge of environmentally hazardous material outside of containment infrastructure.			<p>Inspection of drainage control conducted at:</p> <ul style="list-style-type: none"> • Rance 6, 7 and 8 • Wittwer 11 • Marshall 12, 13, 14 and 15. <p>Also discussed drainage control and rehabilitation schedule with Rehab Planner and Short-term Planning Engineer.</p> <p>Rance 6 was identified as currently high risk and is within the Reservoir Top Water</p>	

Condition	Week 1 Date: 29/01 - 4/02/24 (field inspection date 8th February)	Week 2 Date: 05/02 - 11/02 (field inspection date 15th February)	Week 3 Date: 12/02-18/02 (field inspection date 22nd February)	Week 4 Date: 19/02-25/02 Field inspection (29th February)
			<p>Level 1km zone. Clearing occurred 2017, Mining occurred 2018 and Rehab scheduled for May 2024. It was noted that drainage control is being prioritised at Stone 1, Kisler-6 and Mabbot-2 due to high risk, step gradients and location within RPZ.</p> <p>Drainage control at Rance 6 was observed to comprise compartmentalised catchments, basins in rehabbed areas, trenches at base of open area.</p> <p>Rance 8 drainage control involved compartmentalised catchments, trenches at base of open area.</p> <p>Rance 7 has not yet been mined – drainage control comprised timber stockpiled along contour.</p> <p>Wittwer-11 has not yet been mined – drainage control comprised timber stockpiled along contour and water shots installed to promote infiltration.</p> <p>Marshall 12/13/14/15 – entire area under rehab. Drainage risk is rated low by Alcoa. Drainage control</p>	

Condition	Week 1 Date: 29/01 - 4/02/24 (field inspection date 8 th February)	Week 2 Date: 05/02 - 11/02 (field inspection date 15 th February)	Week 3 Date: 12/02-18/02 (field inspection date 22 nd February)	Week 4 Date: 19/02-25/02 Field inspection (29 th February)
			observed comprised rehab ripping on contour, compartmentalised catchments, basins to retain water and promote infiltration, rocky spillway to facilitate control release if basin overflow occurs / subsurface rocky drainage to allow for infiltration, sumps and pipelines to facilitate transfer of collected water if required.	
5. Restricted Activities				
60-076783:M.2.5 (5) Alcoa must not undertake any clearing, exploration, mining or other operations: — (a) within 1 km of the top water level margin of any water reservoir; or	Conducted site visit at Huntly primarily looking at drainage controls in high gradient areas around Mt Solus, specifically: North-West side of the Mt Solus (within 1 km of the Mt Solus constraint zone) Pit Martin 6 (Reservoir Top Water Level 1 km Area). Pit Martin 7 (Reservoir Top Water Level 1 km Area). Pit Davey 2	No spatial files provided to check the activities' location against the restricted area.	A review of Sentinel-2 aerial imagery timelapse from 12/12/23 to 20/02/24 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.	A review of Sentinel-2 aerial imagery timelapse from 27/01/24 to 27/02/24 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.
(b) within the Serpentine Pipehead Dam Catchment Area or		No spatial files provided to check the activities' location against the restricted area.	A review of Sentinel-2 aerial imagery timelapse from 12/12/23 to 20/02/24 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.	A review of Sentinel-2 aerial imagery timelapse from 27/01/24 to 27/02/24 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.

Condition	Week 1 Date: 29/01 - 4/02/24 (field inspection date 8 th February)	Week 2 Date: 05/02 - 11/02 (field inspection date 15 th February)	Week 3 Date: 12/02-18/02 (field inspection date 22 nd February)	Week 4 Date: 19/02-25/02 Field inspection (29 th February)
<p>(c) in any area that –</p> <p>(i) is within the prohibited zone associated with any water reservoir; and</p> <p>(ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%;</p> <p>or</p>		<p>No spatial files provided to check the activities' location against the restricted area.</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 12/12/23 to 20/02/24 did not indicate new disturbance within in any area that –</p> <p>(i) is within the prohibited zone associated with any water reservoir; and</p> <p>(ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%;</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 27/01/24 to 27/02/24 did not indicate new disturbance within in any area that –</p> <p>(i) is within the prohibited zone associated with any water reservoir; and</p> <p>(ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%;</p>
<p>(d) within 10 metres of a black cockatoo nesting tree or a Huntly Mine black cockatoo significant tree; or</p>	<p>No new BC trees identified for the week.</p> <p>Four chance find tree location coordinates provided. Alcos plans to review the chance findings.</p>	<p>No spatial files provided to check the activities' location against the restricted area.</p>	<p>The presence of mapped cockatoo trees and significant trees was checked opportunistically whilst surveying pit boundaries at:</p> <ul style="list-style-type: none"> • Rance 6, 7 and 8 • Wittwer 11 • Marshall 12, 13, 14 and 15. 	

Huntly site photos 22/02/2024



Rance 7: Boundary markers demarcating boundary of clearing



Rance 6: Trench at base of open area for drainage control

Huntly site photos 22/02/2024



Rance 6: compartmentalised catchments, ripping on contour, basins installed in rehabbed areas.

Wittwer-11: water shots (although not yet blasted) to promote infiltration



Marshall 13: sump with pump to transfer water to other side of catchment if required.

Marshall 14: basin installed in rehab, with rocky spillway for controlled release of water if basin capacity is exceeded

Huntly site photos 22/02/2024



Marshall 15: example of compartmentalised catchments, basins created in rehab, contour ripping



Marshall 15: example of compartmentalised catchments, basins created in rehab, contour ripping

Huntly site photos 29/02/2024



Drilling area about 500 m east of Yate 5 (Approx. Coordinates: 432,435 E; 6,395,893 N)



Example of dirt plugged drill hole after drilling.

Huntly site photos 29/02/2024



Examples of small trees pushed over to allow access to drill sites



Example of large tree in the active drilling area (Coordinate: 432,303E; 6,395,825N)

Huntly site photos 29/02/2024



Eastern pit boundary and drainage control feature at Stone 6.



Southern pit boundary at Stone 6.



Stone 6 pit boundary walk track (The relinquished FCA width along the eastern and southern edges was 2 m. GPS accuracy was 3 m)

Willowdale Active Harvest Area Central 4 (07/03/2024)



Active harvest area at Central 4



Examples of pegging to mark harvesting area at Central 4



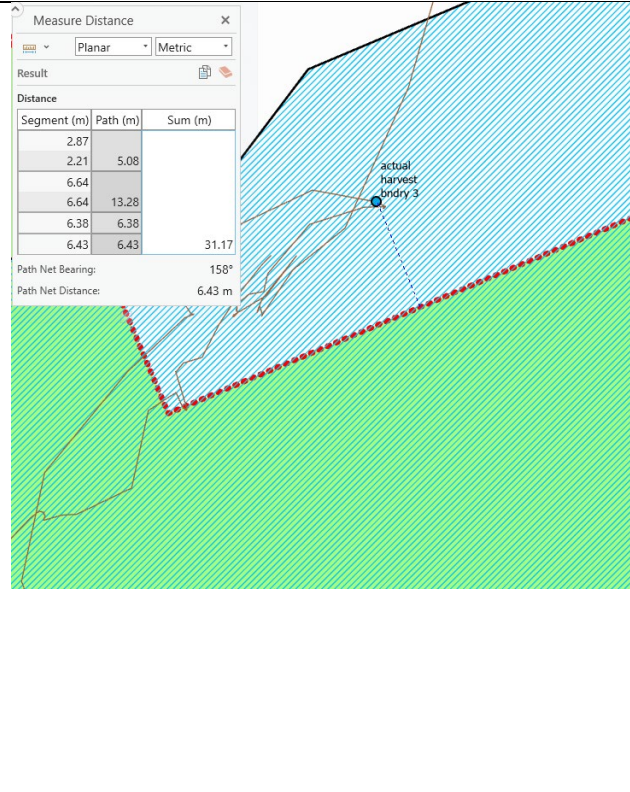
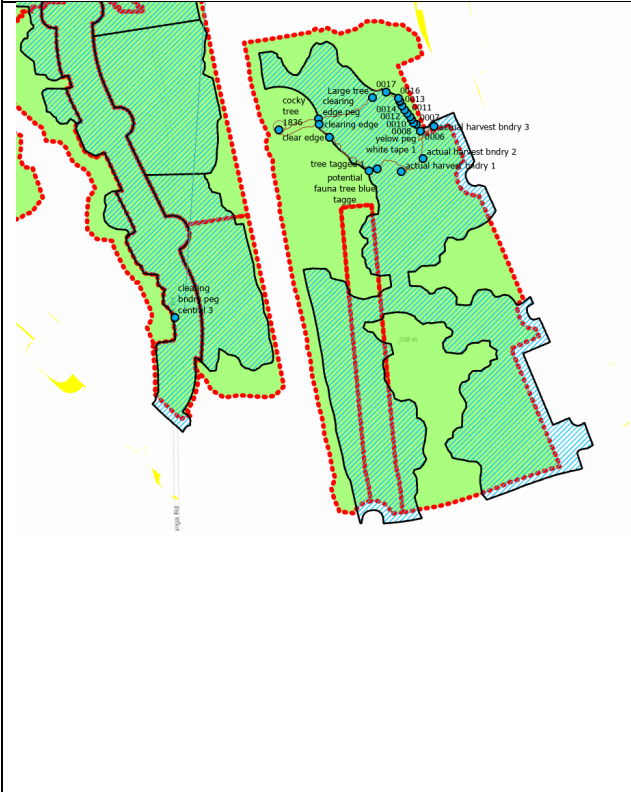
Marked Black Cockatoo Habitat Tree (1836) at Central 4 harvest area



Flagged habitat tree on the harvest area at Central 4

Willowdale site photos 07/03/2024

Active harvest area in Central 4



Solid green–WD MMP 5-Year clearing area.
Hatched Blue–Planned Harvest area

MMP 5-Year clearing area

Actual harvesting boundary (07/03/2024) photo shown in Column 2 of this table.

Willowdale site photos 07/03/2024

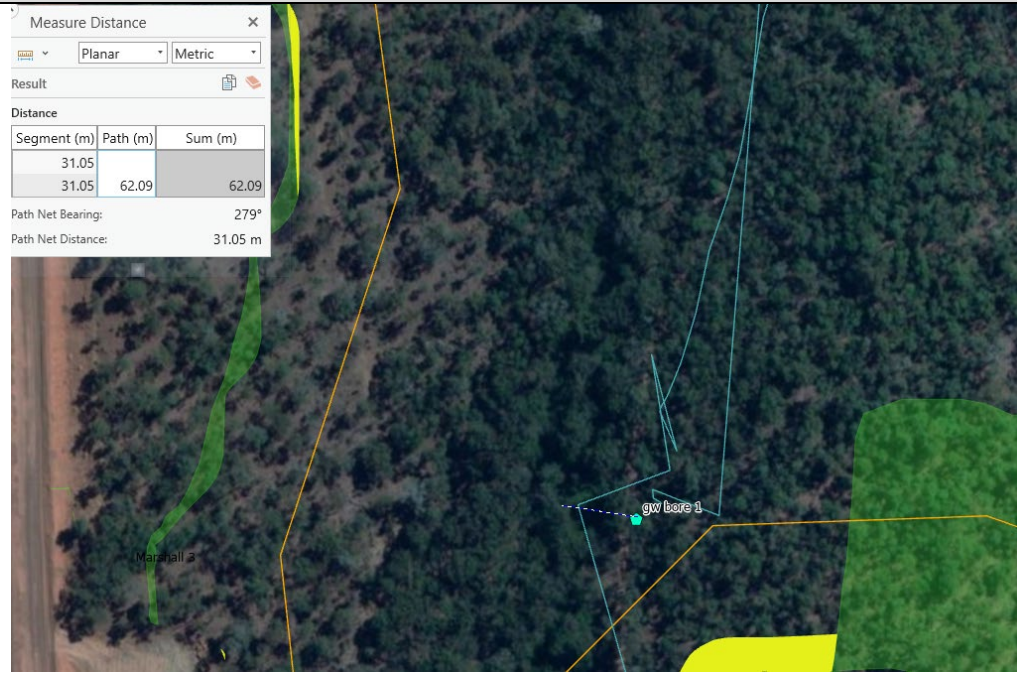


Distance between the surveyed Black Cockatoo tree (#1836) and the pegs marking the harvesting area is about 65 m.

Huntly site photos 07/03/2024



A mound of dirt next to the recently installed groundwater monitoring bore at Lloyd 1 (Coordinates: 416,412 E; 6,408,391N)



Location of the groundwater monitoring bore (shown in column 1)

Huntly site photos 07/03/2024

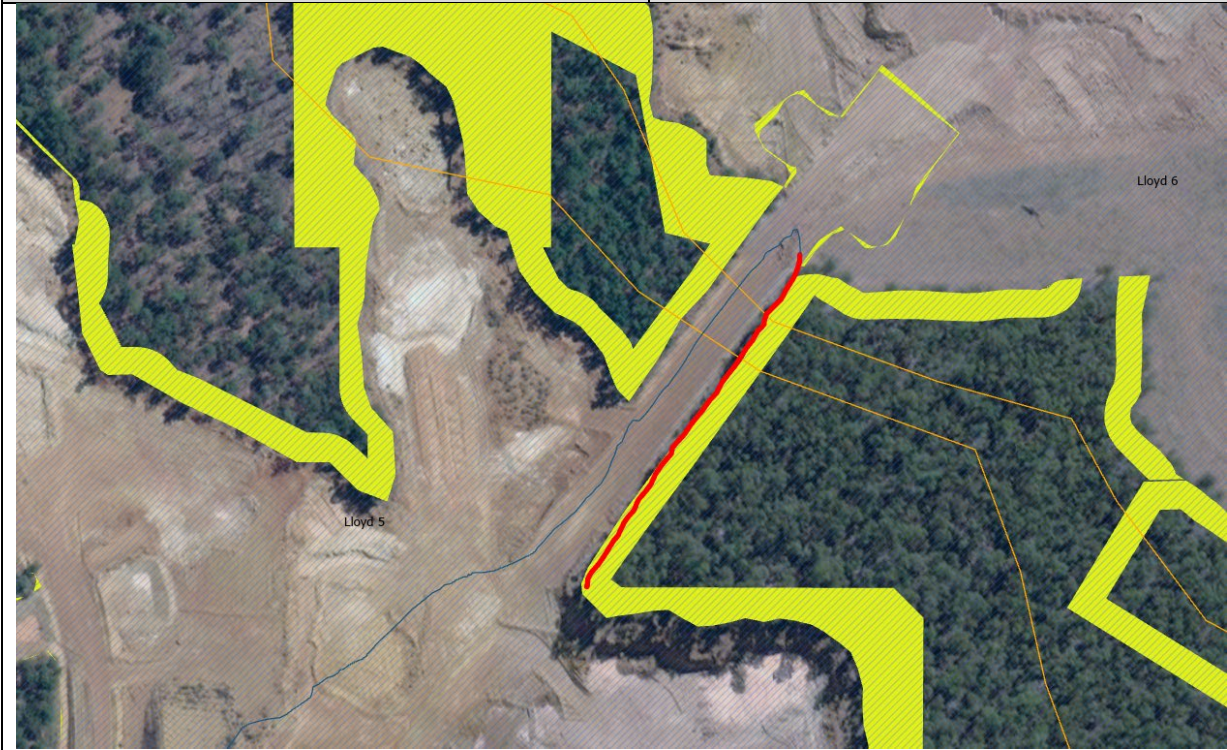


Water runoff flow mark from recently installed groundwater bore at Lloyd 1. The visible white colour is from the chunks of clay left over from the bore drilling. (Coordinates: 416,443 E; 6,408,032 N)



Location of the groundwater monitoring bore (shown in column 1)

Huntly site photos 07/03/2024



Boundary walk checks at Lloyd 5 and lloyd 6

MMP Compliance Findings Worksheet

MARCH 2024

Condition	Week 1 Date: 26/02 - 3/03/24 (Field inspection date 7 March)	Week 2 Date: 04/03 - 10/03 (field inspection date 14 March)	Week 3 Date: 11/03-17/03 (field inspection date 21 March)	Week 4 Date: 18/03-24/03 (Field inspection date 28 March)	Week 5 Date: 25/03 - 31/03/24 (Field inspection date 4 April)
4. Environmental Objectives					
60-076783:M.1.4 (4) Any clearing, exploration, mining, or other operations permitted by this MMP approval must be implemented by Alcoa to meet the following environmental objectives: (a) avoiding or otherwise minimising clearing within 50 metres of Black Cockatoo nesting trees	Refer to 5 (d) for monitoring process	Refer to 5 (d) for monitoring process	Refer to 5 (d) for monitoring process	Refer to 5 (d) for monitoring process	
(b) avoiding or otherwise minimising discharge of environmentally hazardous material outside of containment infrastructure.	Visited the following stormwater management facilities at Arundel (Willowdale) to inspect the current state of the facilities and potentially PFAS contaminated water discharge risk: 1. Arundel site stormwater management ponds: AP1, AP, AP3, AP4	Viewed drainage containment sumps by the main haul road. Sumps were observed to have silt layer at bottom.		Viewed drainage control at the following pits at Willowdale: Minke 3 <ul style="list-style-type: none"> In next years footprint to be rehabbed – moving stockpiles Works in pit-moving clay for 	

Condition	Week 1 Date: 26/02 - 3/03/24 (Field inspection date 7 March)	Week 2 Date: 04/03 - 10/03 (field inspection date 14 March)	Week 3 Date: 11/03-17/03 (field inspection date 21 March)	Week 4 Date: 18/03-24/03 (Field inspection date 28 March)	Week 5 Date: 25/03 - 31/03/24 (Field inspection date 4 April)
	<p>and AP5. These are the series of ponds onsite to store hydrocarbon treated water (lined AP1 and AP2) discharge (unlined AP3, AP4, AP5).</p> <p>2. Currently only the AP1 and AP2 have hydrocarbon treated water. AP 2 is a lined pond connected to the next series on unlined and connected ponds of AP3, AP4 and AP5. AP 5 is the licenced discharge point, but Alcoa is not discharging any water to the environment currently.</p> <p>Water level in AP2 is full of about 50-60 cm free board available. This pond is connected to the next AP 3, AP4 AP5 ponds, which are all dry at the moment, so the current overflow risk from the Pond 2 is low.</p> <p>3. The AP 4 pond is pumped to the recently completed Arundel Pre-Treatment Pond 1 or APTP 2. The APTP 1 and APTP 2 ponds have 50 ML and 60 ML capacity to</p>			<p>next season for rehab</p> <ul style="list-style-type: none"> Sighted trenches Edges of pit observed to have steep >1m ledge before forested areas <p>Gibber 10</p> <ul style="list-style-type: none"> Sighted sumps and drainage trenches Sighted ripping at end of road through Gibber 10 to prevent water entering rehabbed areas Area is to be rehabbed in the next or following season Edges of pit observed to have steep >1m ledge before forested areas <p>Gibber 12</p> <ul style="list-style-type: none"> Sighted trenches from top of Gibber 12 stockpile 	

Condition	Week 1 Date: 26/02 - 3/03/24 (Field inspection date 7 March)	Week 2 Date: 04/03 - 10/03 (field inspection date 14 March)	Week 3 Date: 11/03-17/03 (field inspection date 21 March)	Week 4 Date: 18/03-24/03 (Field inspection date 28 March)	Week 5 Date: 25/03 - 31/03/24 (Field inspection date 4 April)
	<p>hold all site stormwater for the planned PFAS treatment plant.</p> <p>4. Currently Alcoa is shipping PFAS contaminated water from APTP 1 to offsite in preparation for the winter season. The PFAS plant is planned to be commissioned by June/July 2024.</p>			<ul style="list-style-type: none"> • Soil transfer has occurred from next seasons footprint so it can be landscaped <p>Gibber 15</p> <ul style="list-style-type: none"> • Sighted poles with Pink flagging tape marked poles for drainage control for future trenches see photo • Contour sloping downwards towards road and away from forest • Bund on edge preventing water moving out of pit <p>Gibber 16</p> <ul style="list-style-type: none"> • Sighted trench likely recent – trench made of clay • Increased ripping is used for clay to facilitate drainage • Trench used to catch water from up road (see photos of road with hill) • Clear edge with ~50cm cut 	

Condition	Week 1 Date: 26/02 - 3/03/24 (Field inspection date 7 March)	Week 2 Date: 04/03 - 10/03 (field inspection date 14 March)	Week 3 Date: 11/03-17/03 (field inspection date 21 March)	Week 4 Date: 18/03-24/03 (Field inspection date 28 March)	Week 5 Date: 25/03 - 31/03/24 (Field inspection date 4 April)
				<p>between forest and mined area (see photos)</p> <ul style="list-style-type: none"> Sighted groundwater in trench with clay <p>Irawaddy 1</p> <ul style="list-style-type: none"> Sighted dc slots and bunds and clear edge at boundary of pit on forest edge. Most due to be rehabbed next season <p>Vaquita 8</p> <ul style="list-style-type: none"> Sighted trenches in vaquita 8 Pits contour ripped and two bowls in rehabbed area 	
5. Restricted Activities					

Condition	Week 1 Date: 26/02 - 3/03/24 (Field inspection date 7 March)	Week 2 Date: 04/03 - 10/03 (field inspection date 14 March)	Week 3 Date: 11/03-17/03 (field inspection date 21 March)	Week 4 Date: 18/03-24/03 (Field inspection date 28 March)	Week 5 Date: 25/03 - 31/03/24 (Field inspection date 4 April)
<p>60-076783:M.2.5 (5) Alcoa must not undertake any clearing, exploration, mining or other operations: — (a) within 1 km of the top water level margin of any water reservoir; or</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 20/02/24 to 06/03/24 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 1/03/24 to 11/03/24 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.</p> <p>Field verification was conducted at:</p> <ul style="list-style-type: none"> • Rance 1 • Rance 2 • Stone 13 <p>No mining activities were occurring in these areas at the time of field verification.</p> <p><u>Evidence viewed:</u></p> <ul style="list-style-type: none"> • Reservoir_Top_Water_Level_1km_Buffer 	<p>A review of Sentinel-2 aerial imagery timelapse from 6/03/24 to 16/03/24 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 16/03/24 to 21/03/24 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.</p>	<p>Visited Kisler 13 (within RPZ, some areas with slope >16%).</p> <p>Walked along the disturbance boundary and inspected rehabilitation status. The pit is rehabilitated with contour ripping and drainage capture sumps in place.</p> <p>Did not inspect the BC tree (#2652) due to vehicle access to the area (the area has been fully rehabilitated).</p> <p>Visited Ingpen 3 (within RPZ, slope) to inspect drainage control in pits – majority of pit is within the <25% compliance (red).</p> <p>This is a large pit with located in slopy area. The distance from top of the pit to the bottom is about 900 metres. The current drainage controls appear not adequate with sumps that has been cut open by erosions. This pit needs drainage controls work</p>

Condition	Week 1 Date: 26/02 - 3/03/24 (Field inspection date 7 March)	Week 2 Date: 04/03 - 10/03 (field inspection date 14 March)	Week 3 Date: 11/03-17/03 (field inspection date 21 March)	Week 4 Date: 18/03-24/03 (Field inspection date 28 March)	Week 5 Date: 25/03 - 31/03/24 (Field inspection date 4 April)
					<p>before the rainy season. (see photos)</p> <p>A review of Sentinel-2 aerial imagery timelapse from 21/03/24 to 31/03/24 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.</p>

Condition	Week 1 Date: 26/02 - 3/03/24 (Field inspection date 7 March)	Week 2 Date: 04/03 - 10/03 (field inspection date 14 March)	Week 3 Date: 11/03-17/03 (field inspection date 21 March)	Week 4 Date: 18/03-24/03 (Field inspection date 28 March)	Week 5 Date: 25/03 - 31/03/24 (Field inspection date 4 April)
(b) within the Serpentine Pipehead Dam Catchment Area or	A review of Sentinel-2 aerial imagery timelapse from 20/02/24 to 06/03/24 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.	A review of Sentinel-2 aerial imagery timelapse from 1/03/24 to 11/03/24 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area. <u>Evidence viewed:</u> <ul style="list-style-type: none"> Serpentine_Pipehead_Dam_Catchment_Area.shp 	A review of Sentinel-2 aerial imagery timelapse from 6/03/24 to 16/03/24 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.	A review of Sentinel-2 aerial imagery timelapse from 16/03/24 to 21/03/24 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.	A review of Sentinel-2 aerial imagery timelapse from 21/03/24 to 31/03/24 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.

Condition	Week 1 Date: 26/02 - 3/03/24 (Field inspection date 7 March)	Week 2 Date: 04/03 - 10/03 (field inspection date 14 March)	Week 3 Date: 11/03-17/03 (field inspection date 21 March)	Week 4 Date: 18/03-24/03 (Field inspection date 28 March)	Week 5 Date: 25/03 - 31/03/24 (Field inspection date 4 April)
<p>(c) in any area that –</p> <p>(i) is within the prohibited zone associated with any water reservoir; and</p> <p>(ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%;</p> <p>or</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 20/02/24 to 06/03/24 did not indicate new disturbance within in any area that –</p> <p>(i) is within the prohibited zone associated with any water reservoir; and</p> <p>(ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%;</p>	<p>Field verification was conducted at:</p> <ul style="list-style-type: none"> • Rance 1 • Rance 2 • Stone 13 • Stone 1 • Mabbot 1 • Mabbot 2 <p>No mining activities were occurring in these areas at the time of field verification.</p> <p>Evidence viewed</p> <ul style="list-style-type: none"> • Slope_extract Bands_Jarrahdale) dwellingup_combined_Jan_2017_G DDA20.ers • Reservoir_Prohibited_Zone.shp 	<p>A review of Sentinel-2 aerial imagery timelapse from 6/03/24 to 16/03/24 did not indicate new disturbance within in any area that –</p> <p>(i) is within the prohibited zone associated with any water reservoir; and</p> <p>(ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%;</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 16/03/24 to 21/03/24 did not indicate new disturbance within in any area that –</p> <p>(i) is within the prohibited zone associated with any water reservoir; and</p> <p>(ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%;</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 21/03/24 to 31/03/24 did not indicate new disturbance within in any area that –</p> <p>(i) is within the prohibited zone associated with any water reservoir; and</p> <p>(ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%;</p>
<p>(d) within 10 metres of a black cockatoo nesting tree or a Huntly Mine black cockatoo significant tree; or</p>	<p>Inspection at the currently being cleared area at Central 4 in Willowdale indicate the Black Cockatoo tree onsite (#1836) has been tagged and the pegged distance is adequate to meet the MMP requirement. Distance</p>	<p>The presence of mapped cockatoo trees and significant trees was checked opportunistically whilst conducting field verification at:</p> <ul style="list-style-type: none"> • Howson 2 • Stone 13 • Stone 1 		<p>The presence of mapped cockatoo trees and significant trees was checked opportunistically whilst conducting field verification at:</p> <ul style="list-style-type: none"> • Wills 4 (# 4561 status protect). BC tree was observed to be 	

Condition	Week 1 Date: 26/02 - 3/03/24 (Field inspection date 7 March)	Week 2 Date: 04/03 - 10/03 (field inspection date 14 March)	Week 3 Date: 11/03-17/03 (field inspection date 21 March)	Week 4 Date: 18/03-24/03 (Field inspection date 28 March)	Week 5 Date: 25/03 - 31/03/24 (Field inspection date 4 April)
	<p>between the planned harvesting edge marking pegs and the tree was about 65 m.</p>	<p>BC trees at Howson 2 were all observed to be present however one tree was observed to be missing its metal ID tag.</p> <p>Stone 13 BC trees were observed to be present.</p> <p>Stone 1 BC trees were verified to be present.</p> <p>No mining activities were occurring in these areas at the time of field verification.</p> <p><u>Evidence viewed:</u></p> <ul style="list-style-type: none"> Cockatoo trees with missing tags.PNG Black_Cockatoo_Nest_and_Sig_Trees_10m_Buffer_20240129.shp 		<p>present and was within a tree island, however metal tag was missing.</p> <p><u>Evidence viewed:</u></p> <ul style="list-style-type: none"> Black_Cockatoo_Nest_and_Sig_Trees_10m_Buffer_20240129.shp 	

Huntly site photos 07/03/2024

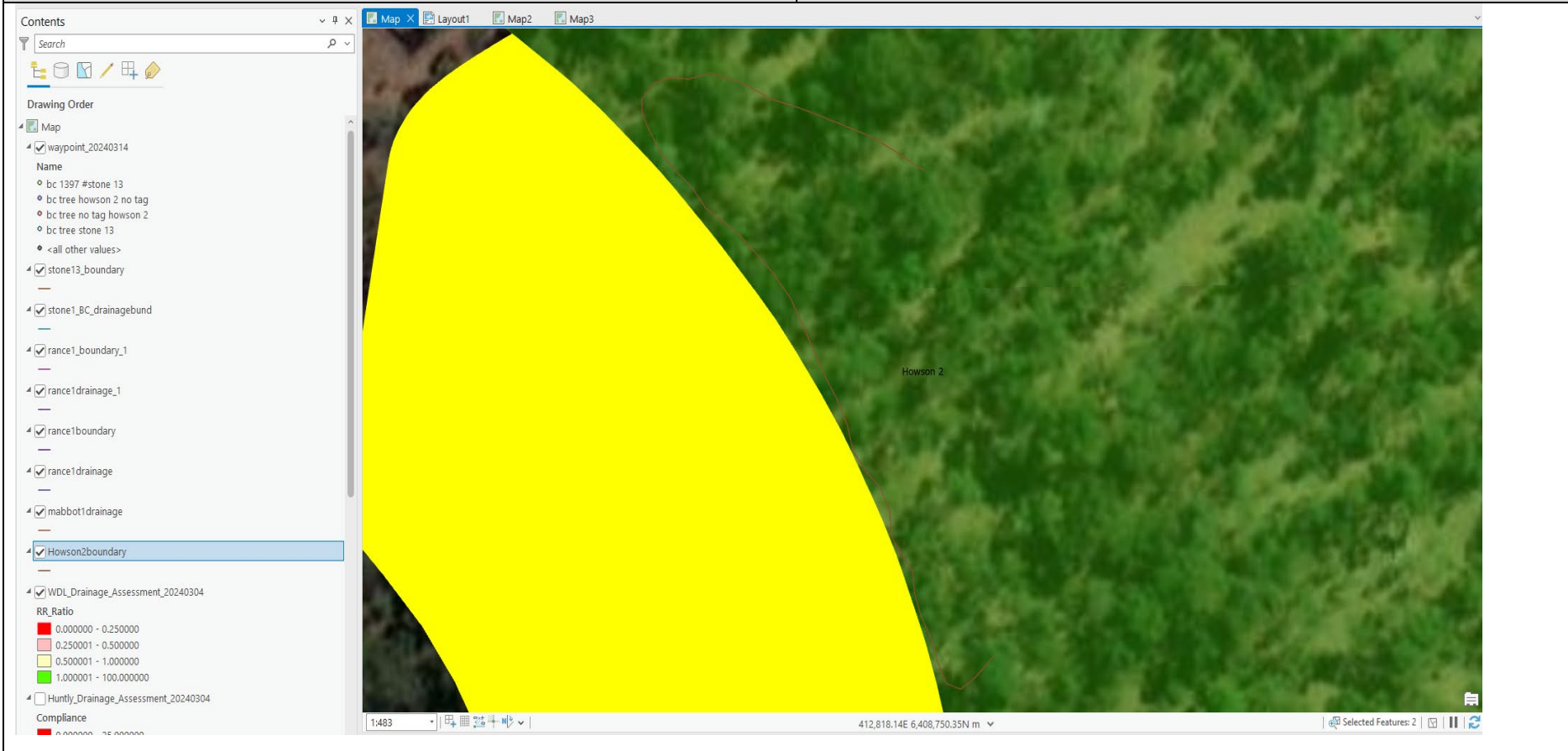


Arundel Pond 2 containing potentially PFAS contaminated water. This pond is lined and connected to the unlined AP3, AP4 and AP5 ponds. AP5 is the licenced discharge point but currently no water is transferred to AP 5. Currently there is no risk of overflow and discharge of the water to the environment from these facilities.



Unlined AP4 pond. Potentially PFAS contaminated water is pumped from this pond to the newly constructed/lined 50 ML APTP 2 pond. Currently no storm water is allowed to move to downstream of this pond at Arundel.

Huntly site photos 14/03/2024



Howson 2 track walked (orange line) to verify clearing boundary against FCA area (yellow polygon).

Huntly site photos 14/03/2024



Howson 2 black cockatoo trees within the Huntly Native Vegetation disturbance footprint.

Huntly site photos 14/03/2024

The screenshot shows a GIS application window with a map of a site. A green polygon highlights a specific area, and two blue circles are overlaid on it. The left circle is labeled 'Howson 2'. The right circle is unlabeled. The map interface includes a 'Contents' panel on the left with a 'Drawing Order' list, a search bar, and various map layers. The bottom of the window features a toolbar and a table with the following data:

OBJECTID	Shape	Date	Region	NestType	TreeSpecie	TreeCondit	TreeDiamet	HollowType	HollowUse	Bees	Camera	NestID	Location
1	Polygon	13/08/2014	Myara	Nest	Marri	Good		Top entry	Recent chewing/wear		Yes	1286	
2	Polygon	13/08/2014	Myara	Possible nest	Marri	Good		Top entry	Old chewing/wear		No	6566	

Howson 2 black cockatoo trees missing metal identification tag. Tree on the right is classified as Nest (requires metal tag), and left is classified as possible nest (doesn't require metal tag).

Huntly site photos 14/03/2024



Rance 1 trench leading to sump segregating rehabilitated area from dieback stockpile.



Rance 1 observed contours and ripping in rehabilitated area with two catchment basins visible.

Huntly site photos 14/03/2024



Rance 2 drainage control (trench and sump)



Stone 13 dishes and machinery working on landscaping.

Huntly site photos 14/03/2024



Mabbot 1 drains



Mabbot 1 drain and pipeline installed for groundwater to be pumped up hill if necessary into upgradient drains.

Huntly site photos 14/03/2024



Mabbot 1 observed groundwater and pump.

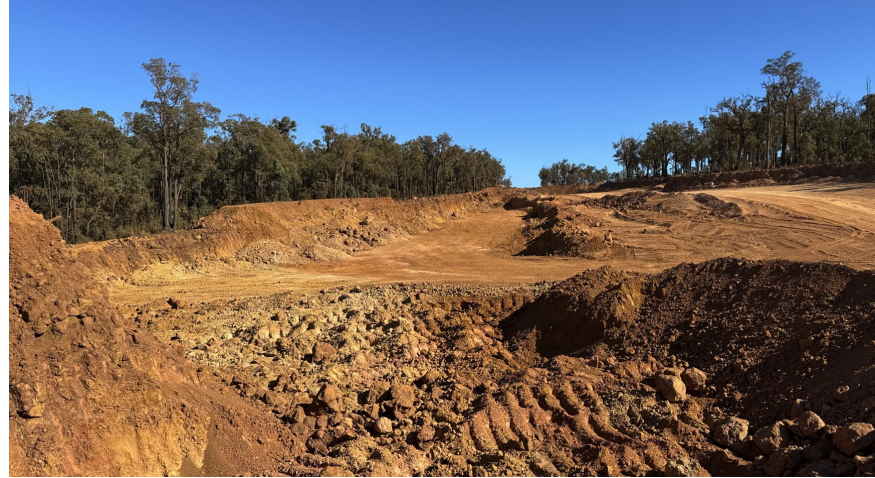


Mabbot 1 dish

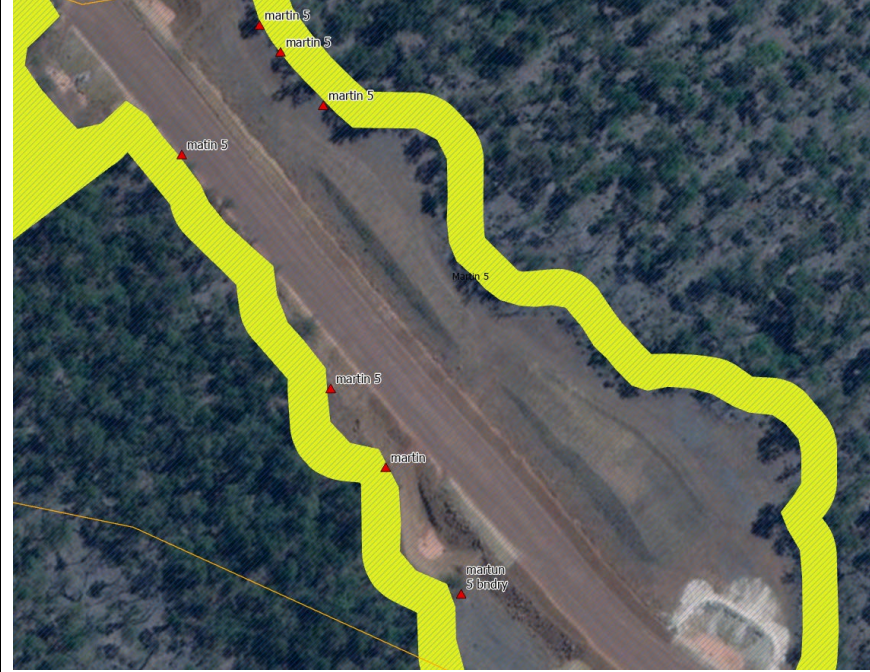


Mabbot 1 depth marker.

Huntly site photos 21/03/2024

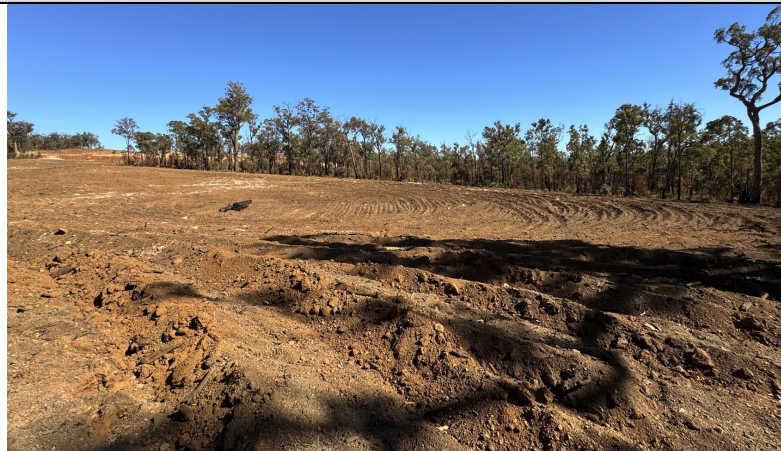


Martin 5 mined pit. Pit walls act as drainage control in this area



Pit boundary check points against the relinquished FCA at Martin 5.

Huntly site photos 21/03/2024



Martin 6 completed rehabilitation area (Coordinate 419,752E; 6,411,054N the lowest point of the pit)



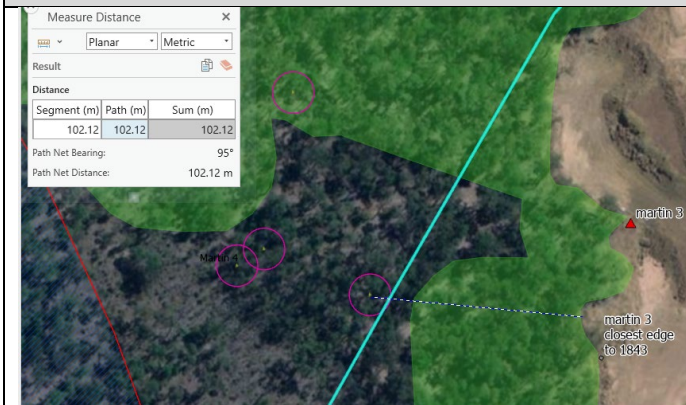
Pit boundary check points against the relinquished FCA at Martin 6.



Sections of the Martin 3 are under mining and the pit acts as sump and no immediate drainage risk.



Huntly site photos 21/03/2024



Martin 3 disturbance boundary and the closest BC tree distance 100 m.

Kisler 11 stabilised and rehabilitated area



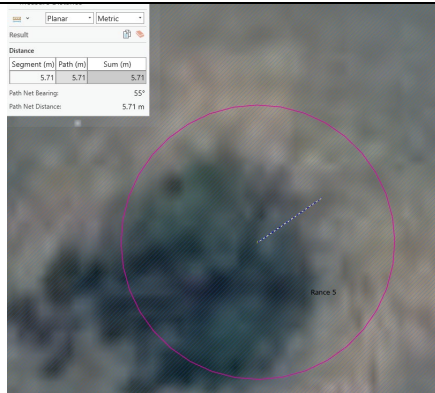
Kisler 11 significant tree (924) and disturbance boundary is > 10 m.

Interim drainage control at Kisler 11. Cut volume to catchment volume ratio is between 25-50% in this area.

Huntly site photos 21/03/2024



Topsoil return at Rance 5. This area is within the 1km dam top water level zone and about 350 m to the nearest stream.

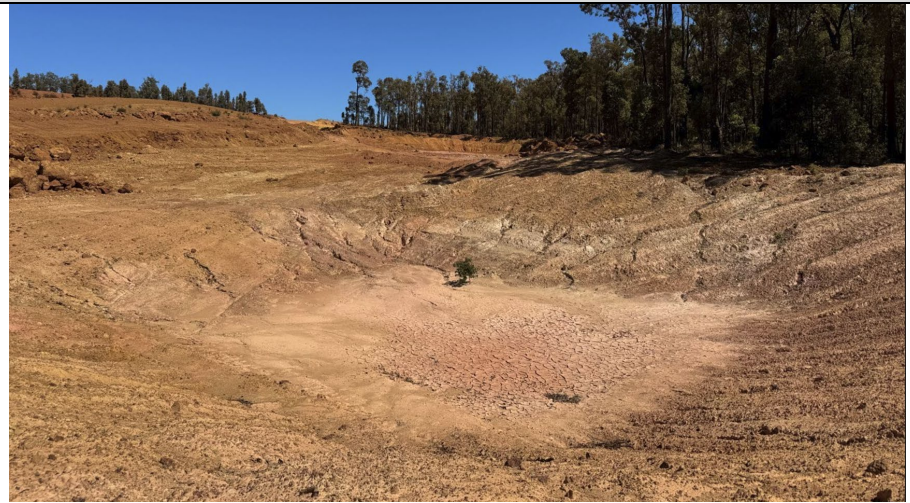


Disturbance boundary less than 10 m to the possible Black Cockatoo nest tree at Rance 5 (#3549) in the right

Huntly site photos 21/03/2024



Downes 6 edge disturbance check points



Drainage control sump at Downes 6

Huntly site photos 21/03/2024



Drainage control sumps at Downes 6

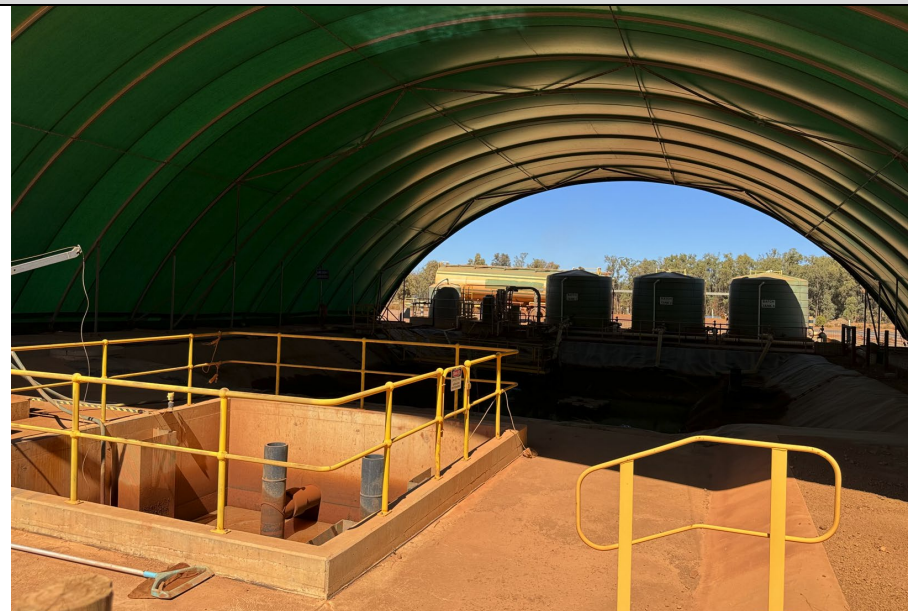


Onsite PFAS Treatment plant and the 190 ML potentially PFAS contaminated water holding pond at Myara

Huntly site photos 21/03/2024



Heavy vehicle fuel farm drainage channels for fuel spill



Potentially hydrocarbon contaminated water from the fuel bay reports to this site UltraSpin water treatment plant holding pond before transported to McCoy site for treatment.

Week 4 photos – 28/03/2024

Willowdale site photos 28/03/2024



Black Cockatoo Tree at Wills 4 – no metal tag present

Willowdale site photos 28/03/2024



Minke 3 – trenches observed



Minke 3- steep edge >1m high at edge of pit before forest area.

Willowdale site photos 28/03/2024



Gibber 10- steep edge >1m high at edge of pit before forest area



Gibber 10 - ripping through road leading to forested area to prevent water entering rehabbed areas.

Willowdale site photos 28/03/2024



Gibber 10 – sump

Willowdale site photos 28/03/2024



Gibber 12 – trenches sumps, and stockpiles at Gibber 12 .

Willowdale site photos 28/03/2024



Gibber 15: Poles with Pink flagging tape marking area for future trenches



Gibber 15 – pit is sloped towards road and away from forested areas. Bund also to prevent water entering forested area to the left.

Willowdale site photos 28/03/2024



Gibber 16 – recently completed trench made of clay



Gibber 16 – recently completed trench made of clay with groundwater present.

Willowdale site photos 28/03/2024



Gibber 16 – clear edge between pit and forest >1m high.

Willowdale site photos 28/03/2024



Irawaddy 1 – trenches



Irawaddy 1 – angled edge and contour away from forest edge



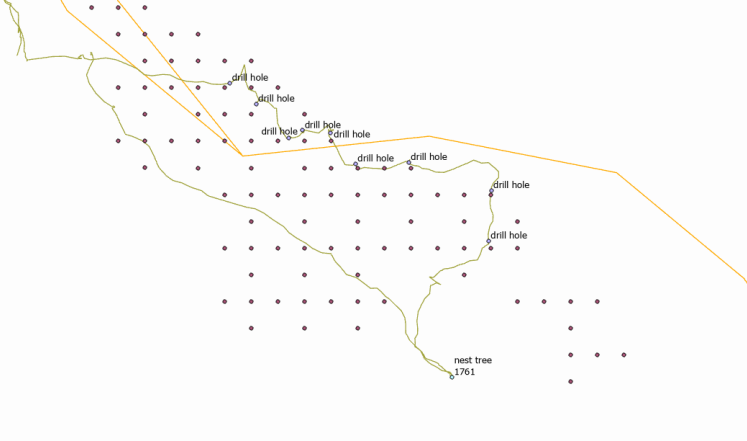

Willowdale site photos 28/03/2024



Vaquita 8 - Trench



Vaquita 8 – contour ripping and bowls at Vaquita 8.

Huntly site photos 04/04/2024	
	
	
<p>Examples of drilled area disturbance in Wittwer 6. The checked areas have minimal disturbance. No disturbance around black cockatoo tree 1761 (not tagged).</p>	

Huntly site photos 04/04/2024



Rehabilitated areas and BC tree 1744 at Bennet 1.

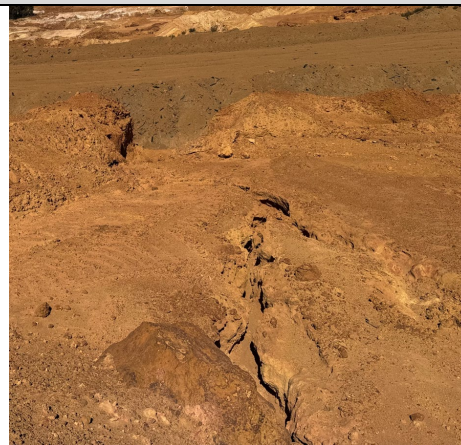


Walk track around disturbed areas at Kisler 13 (left). The bottom of the pit is rehabilitated with drainage controls (contour ripping and drainage control sump) in place (right).

Huntly site photos 04/04/2024



(a)



(b)



(c)



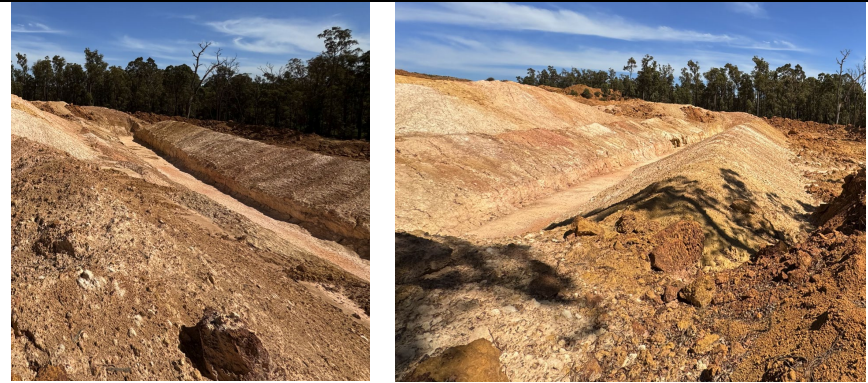
(d)

Drainage control condition at Downes 9. View from the top of the pit (a), sump erosions (b), and the condition of the Ingpen 1 (c) and Ingpen 3 (d) bottom sumps.

Huntly site photos 04/04/2024



Downes 9 edge disturbance check points



Downes 9 drainage control trenches at the top (left) and bottom of the pit (right)



Burnt state of the vegetation cover around turbidity monitor SE59.



MMP Compliance Findings Worksheet April 2024


Condition	Week 1 Date: 25/03 – 31/03/24 (Site verification 4 April)	Week 2 Date: 1/04 – 7/04/2024 (Site verification 11 April)	Week 3 Date: 8/04/2024 – 14/04/2024 (Site verification 18 April)	Week 4 Date: 15/04/2024 – 21/04/2024 (Site verification 26 April)	Week 5 Date: 22/04/2024 – 28/04/2024 (Site verification 2 May)	Week 6 Date: 29/04/2024 – 6/05/2024 (Site verification 7/05/2024, 9/05/2024)
4. Environmental Objectives						
60-076783:M.1.4 (4) Any clearing, exploration, mining, or other operations permitted by this MMP approval must be implemented by Alcoa to meet the following environmental objectives: (a) avoiding or otherwise minimising clearing within 50 metres of Black Cockatoo nesting trees			<p>Visited Willowdale Central 4 pit recently cleared are to inspect Black Cockatoo tree (nest ID 1836) protection buffer.</p> <p>Timber windrows currently placed for drainage control for the harvested areas. See photos.</p> <p>The cleared area was approved FCA (endorsed) 2023A which predates the current MMP. GDP 0065 was issued for the area clearance. As the area was approved for mining before the current MMP, the 50 m black cockatoo tree protection buffer does not apply (Alcoa obtained the exemption letter from the Premier’s office. See attached photo. Alcoa conducts daily monitoring of harvesting and clearing contractors. The BC tree 1836 area has not cleared yet, but 15 m buffer pegs placed around it. See peg locations in the photos.</p> <p>Visited harvest area in Flinders pit in Willowdale. The area clearing is approved by FCA 2023A issued prior to the current MMP approval. Alcoa’s internal GDP 0068 was approved on 28/03/2024. The area is under harvesting. Walked southwestern edge of the area following the clearing boundary pegs. All in approved clearing area. The closest BC tree is about 70 m from the clearing edge. See photos.</p>			
(b) avoiding or otherwise minimising discharge of environmentally hazardous	Visited Downes 9 (within RPZ and 1km top water level margin, slope >16%) for drainage control	Inspected Simpson 1 pit drainage control. Although , the pit is bordered with the Simpson road (which has	Visited Willowdale Gibber 15 to see drainage control. Mining completed at this pit more than 12 months ago	-	Site verification was conducted at Macquarri 1. Dozers were present completing landscaping on	Site verification for wastewater treatment and storage facilities as well as dangerous goods storage

Condition	Week 1 Date: 25/03 – 31/03/24 (Site verification 4 April)	Week 2 Date: 1/04 – 7/04/2024 (Site verification 11 April)	Week 3 Date: 8/04/2024 – 14/04/2024 (Site verification 18 April)	Week 4 Date: 15/04/2024 – 21/04/2024 (Site verification 26 April)	Week 5 Date: 22/04/2024 – 28/04/2024 (Site verification 2 May)	Week 6 Date: 29/04/2024 – 6/05/2024 (Site verification 7/05/2024, 9/05/2024)
material outside of containment infrastructure.	inspection and disturbance extends against relinquished FCAs/NV disturbance footprint. The current drainage controls appear well maintained. See photos.	drainage control sumps) the current drainage control around the bottom area needs more maintenance before rainfall. It is recommended to inspect this area in May 2024.	(WB). New trenches cut in central eastern pit areas to manage high drainage risk in the area. Pit floor ripping also completed in the south-western part of the pit (see photos). The Gibber 15 pit floor ripped areas to be inspected during rainy season. According to WB (drainage Control) the pit floor ripping is an interim measure for drainage control. Visited Willowdale Wills 2 and Wills 6 pits to inspect drainage control. The Alcoa provided drainage risk assessment map was based on November 2023 survey data and no longer valid. Active mining is being undertaken in these pits during the inspection. Alco needs to ensure the drainage assessment maps to be updated when pit activity status is changed.		the east side of the pit. The west side was observed to have already had soil return completed. Contoured bowls at the bottom of the pit were sighted as well as a sump with a pump attached to pump water out. An area of improvement was identified with a diesel spill observed under the pump next to the bottom sump indicating a potential leak from the pump tank. It is recommended for Alcoa to investigate the spill and rectify.	areas was conducted on the 7/05/2024 at Willowdale. The following areas were inspected: Sampson Dam Crossing Area Sumps Orion Wastewater Treatment facilities and storage sumps including washbay and oily water separator Larego oily water ponds and DAF holding sump Stormwater management facilities at larego including sumps, main water treatment area, oily water separator and DAF. Arundle dangerous goods area, stormwater ponds and waste area. On the 9/05/2024, the serpentine crossing causeway was inspected at Huntly Mine. The area was observed to have spill kits and plastic lined sumps with 2x emergency overflow sumps. No areas of concern were identified.
5. Restricted Activities						
60-076783:M.2.5 (5) Alcoa must not undertake any clearing, exploration, mining or other operations: – (a) within 1 km of the top water level margin of any water reservoir; or	Visited Kisler 13 (within RPZ, some areas with slope >16%). Walked along the disturbance boundary and inspected rehabilitation status. The pit is rehabilitated with contour ripping and drainage capture sumps in place. Did not inspect the BC tree (#2652) due to vehicle access to the area (the area has been fully rehabilitated). Visited Ingpen 3 (within RPZ, slope) to inspect drainage control in pits –	A review of Sentinel-2 aerial imagery timelapse from 31/03/24 to 05/04/24 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir. Visited Downes 8 pit high drainage risk assessment area. Drainage control in the area does not appear in good condition. Evidence of erosion creating small channels in the pit. This area is assessed as high risk. Visited Atherton 1 to inspect drainage control. The reported drainage assessment is no longer	A review of Sentinel-2 aerial imagery timelapse from 05/04/24 to 10/04/24 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.	A review of Sentinel-2 aerial imagery timelapse from 10/04/2024 to 20/04/2024 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir. Visited Stone 13 pit area of Huntly mine to for drainage control. Most of the pit, except the southern parts has been rehabilitated during the visit. Drainage controls i.e. ripping and trenches in place in the high drainage risk area. See photos. This area is within Reservoir Top Water Level 1 km buffer.	A review of Sentinel-2 aerial imagery timelapse from 20/04/2024 to 25/04/2024 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.	A review of Sentinel-2 aerial imagery timelapse from 25/04/2024 to 5/05/2024 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.

Condition	Week 1 Date: 25/03 – 31/03/24 (Site verification 4 April)	Week 2 Date: 1/04 – 7/04/2024 (Site verification 11 April)	Week 3 Date: 8/04/2024 – 14/04/2024 (Site verification 18 April)	Week 4 Date: 15/04/2024 – 21/04/2024 (Site verification 26 April)	Week 5 Date: 22/04/2024 – 28/04/2024 (Site verification 2 May)	Week 6 Date: 29/04/2024 – 6/05/2024 (Site verification 7/05/2024, 9/05/2024)
	<p>majority of pit is within the <25% compliance (red). This is a large pit with located in slopy area. The distance from top of the pit to the bottom is about 900 metres. The current drainage controls appear not adequate with sumps that has been cut open by erosions. This pit needs drainage controls work before the rainy season. (see photos)</p> <p>A review of Sentinel-2 aerial imagery timelapse from 21/03/24 to 31/03/24 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.</p>	<p>applicable as the area has now been fully rehabilitated. See photos.</p> <p>Walked along the pit perimeter for any disturbance into FCA areas. No compliance issues observed. See photos.</p>		<p>Visited Marshall 6 pit for disturbance boundary against FCA boundaries. New trenches have been dug in the drainage risk southern parts of the pit. Walked along the FCA boundary and no potential issues noticed. This area is within Reservoir Top Water Level 1 km buffer. See photos.</p> <p>Visited Downes 10 pit to inspect high drainage risk area. The current state of the pit indicates that the Downes 10 pit has been rehabilitated fully for several years. There was visible gully erosion (423,582E: 6,406,210N) from the pit heading into the forested area (see photos). Currently the size of the erosion is not large about 40x50 cm, but could get worse if left without fixing (See photos). This issue is reported to the Alcoa team on the same day.</p> <p>Walked along the tree boundary for FCA disturbance check. See photos.</p> <p>Black Cockatoo nest tree (#685) inspected for nearby disturbance activities. No issues noted.</p>		
<p>(b) within the Serpentine Pipehead Dam Catchment Area or</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 21/03/24 to 31/03/24 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 31/03/24 to 05/04/24 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 05/04/24 to 10/04/24 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 10/04/2024 to 20/04/2024 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 20/04/2024 to 25/04/2024 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.</p> <p>Site verification was conducted at Ingpen 8. Boundary of approved pit marked area was walked and confirmed to be outside of the serpentine pipehead dam catchment area (Ingpen8_20240502.shp)</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 25/04/2024 to 5/05/2024 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.</p>

Condition	Week 1 Date: 25/03 – 31/03/24 (Site verification 4 April)	Week 2 Date: 1/04 – 7/04/2024 (Site verification 11 April)	Week 3 Date: 8/04/2024 – 14/04/2024 (Site verification 18 April)	Week 4 Date: 15/04/2024 – 21/04/2024 (Site verification 26 April)	Week 5 Date: 22/04/2024 – 28/04/2024 (Site verification 2 May)	Week 6 Date: 29/04/2024 – 6/05/2024 (Site verification 7/05/2024, 9/05/2024)
<p>(c) in any area that –</p> <ul style="list-style-type: none"> (i) is within the prohibited zone associated with any water reservoir; and (ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%; <p>or</p>	<p>A review of Sentinel-2 aerial imagery timelapse from 21/03/24 to 31/03/24 did not indicate new disturbance within in any area that –</p> <ul style="list-style-type: none"> (i) is within the prohibited zone associated with any water reservoir; and (ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%; 	<p>A review of Sentinel-2 aerial imagery timelapse from 31/03/24 to 05/04/24 did not indicate new disturbance within in any area that –</p> <ul style="list-style-type: none"> (i) is within the prohibited zone associated with any water reservoir; and (ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%; 	<p>A review of Sentinel-2 aerial imagery timelapse from 05/04/24 to 10/04/24 did not indicate new disturbance within in any area that –</p> <ul style="list-style-type: none"> (i) is within the prohibited zone associated with any water reservoir; and (ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%; 	<p>A review of Sentinel-2 aerial imagery timelapse from 10/04/2024 to 20/04/2024 did not indicate new disturbance within in any area that –</p> <ul style="list-style-type: none"> (i) is within the prohibited zone associated with any water reservoir; and (ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%; 	<p>A review of Sentinel-2 aerial imagery timelapse from 20/04/2024 to 25/04/2024 did not indicate new disturbance within in any area that –</p> <ul style="list-style-type: none"> (i) is within the prohibited zone associated with any water reservoir; and (ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%; 	<p>A review of Sentinel-2 aerial imagery timelapse from 25/04/2024 to 5/05/2024 did not indicate new disturbance within in any area that –</p> <ul style="list-style-type: none"> (i) is within the prohibited zone associated with any water reservoir; and (ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%;
<p>(d) within 10 metres of a black cockatoo nesting tree or a Huntly Mine black cockatoo significant tree; or</p>					<p>BC tree #1710 and #961 was viewed at Wittwer 3. The surrounding area for both trees was not disturbed. BC tree #961 was observed to have fallen over (photo provided) however his information has not been captured in the database.</p> <p>Evidence: BC_NestTrees_20240422.Shp Black_Cockatoo_Nest_and_Sig_Trees_20240129.shp</p> <p>During site inspection at Ingpen 8, BC trees #4930 and #1579 were viewed. The area surrounding the trees was observed to be undisturbed. BC tree #1579 was observed to have been burnt with the top half of the tree fallen however the hollow appeared to still be present in the tree.</p>	<p>Site verification of BC trees at Huntly was carried out on the 07/05/2024. The following trees were sighted:</p> <ul style="list-style-type: none"> #1314 at Ingpen 4 – was viewed. BC tree was a solitary tree on an island with no other trees or vegetation around it. The tree had an old thin metal tag on it with no number. #2830 and #901 were viewed from a distance from within the pit. Trees were viewed to be on two small tree islands within the pit. #6328 at Ingpen 5 – was observed to be within a forested undisturbed area greater than 10 m from the pit edge

Week 2 photos

Huntly site photos 11/04/2024			
			
<p>Drainage control at Stone 5 pit bottom area.</p>		<p>Stone 5 perimeter walk</p>	
			
<p>Unplugged blast drill holes around Stone 5 pit</p>			

Huntly site photos 11/04/2024



Drainage control at Simpson 1 pit bottom area. The current drainage control appears needing more work before rainy season.

Huntly site photos 11/04/2024



Downes 8 drainage risk area. Storm water from this area reports to road sump (right). This area is currently assessed as high drainage risk area.

Huntly site photos 11/04/2024



Fully rehabilitated Atherton 1 pit bottom areas (left) and disturbance boundary walk checks (right)

Willowdale site photos 18/04/2024



Newly cut trenches at Gibber 15 for drainage control

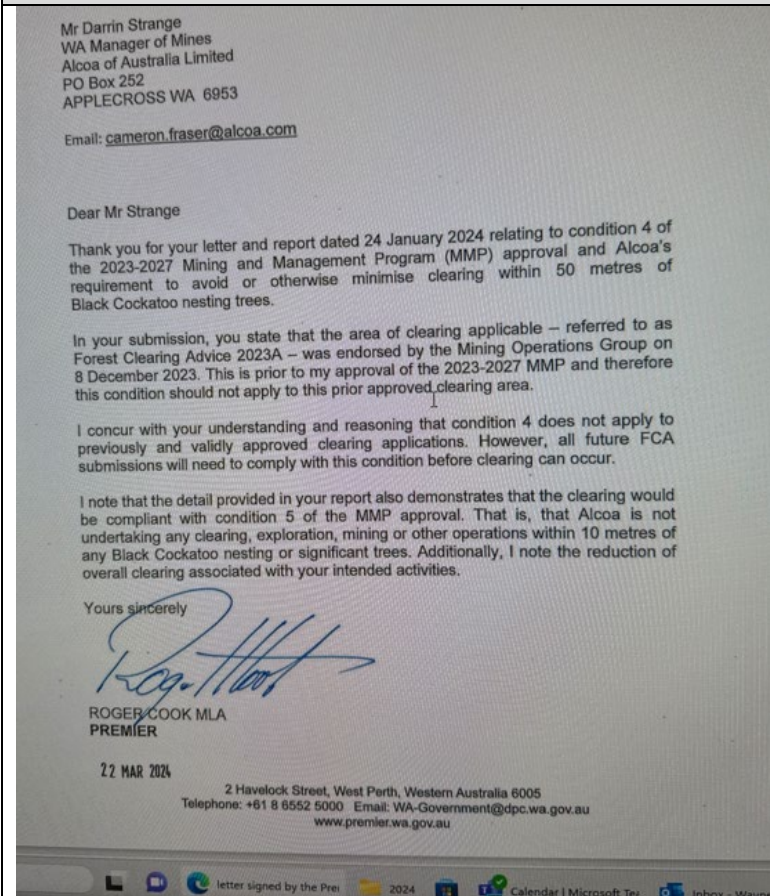


Newly ripped pit floor for stabilisation at Gibber 15

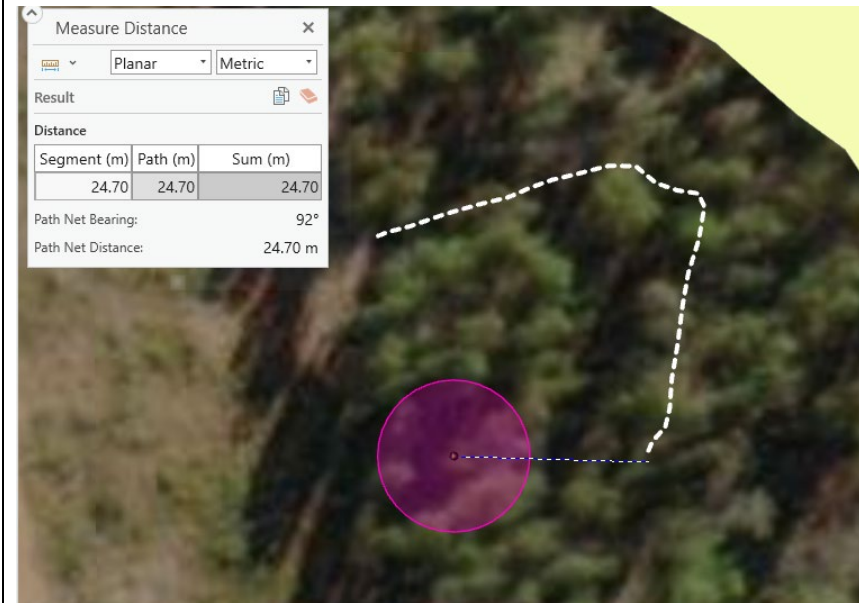


Active mining in Wills 2. The mine face acts as drainage control currently.

Willowdale site photos 18/04/2024



Approval letter exempting the 2023-2027 MMP Condition 4 for previously approved FCA.



New 25m buffer around the BC tree (#1836) in the Central 4 clearing area. White dashed line shows GPS locations of clearing boundary pegs.

Willowdale site photos 18/04/2024



Planned harvest area at Flinders, Willowdale. Red line shows GPS tracking of clearing boundary. The closest BC tree is about 70 m from the clearing edge.



Timber windrows at Central 4, Willowdale cleared areas.

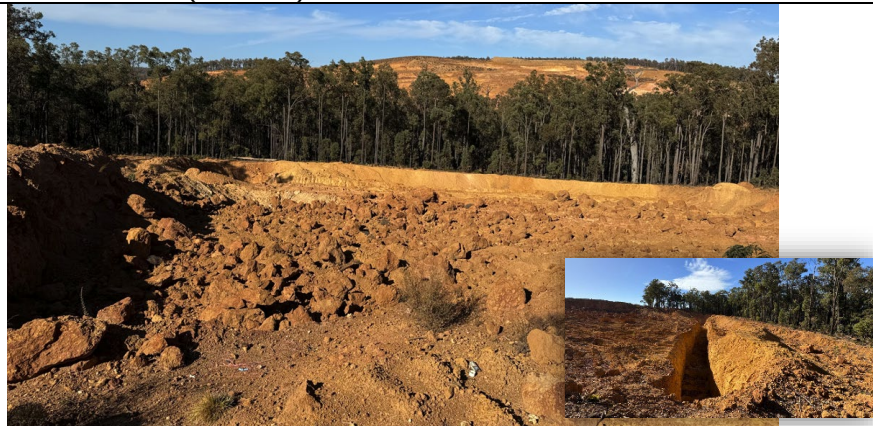
Huntly site photos 26/04/2024



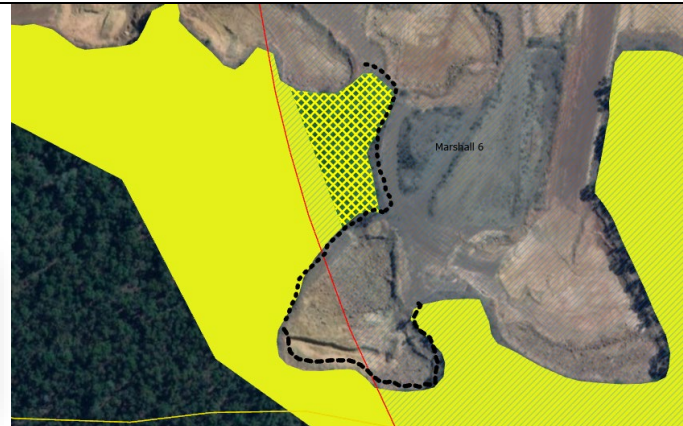
Drainage Control at Stone 13 drainage risk southern parts of the pit. Photo location (blue dot) is shown in the inset.



Rehabilitated areas around Black Cockatoo Tree (nest ID 1396)



Marshall 6 drainage controls trench

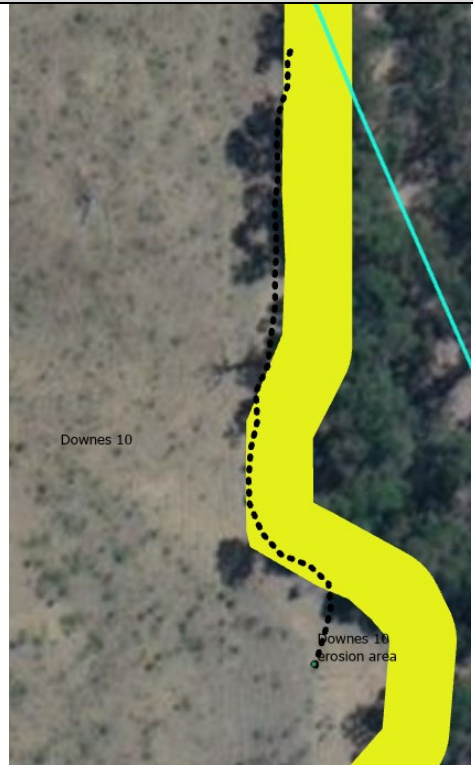


FCA boundary check wlk track

Huntly site photos 26/04/2024



Erosion from the rehabilitate areas of Downes 10.
Coordinates: (423,582E: 6,406,210N)



FCA area disturbance check track (GPS
Garmin Montana 700)



Black Cockatoo nest tree (#685). No disturbance noted within 10 m around the tree.

Flagging tape pegged boundaries at Witter 3 for GDP_001115



Drill hole at Elliot 3



Example of disturbance at Elliot 3



Example of disturbance at Radiata 8



Drill holes at Radiata 8



H marked tree at Radiata 8



Large tree 1 at Radiata 8



Large trees and exploration drill holes at Radiata 8



Black dots - Large Trees

Brown/green dots - exploration drill holes

Pink dots - GPS marked drill holes (differ from actual marked drill holes due to GPS accuracy)

Contour bowl and ripping at Macquarrie 1



Sump at Macquarrie 1



SE02 turbidity monitor in stream with pipe



Initial turbidity reading



Samson Dam crossing area sumps



AOI - Samson Dam crossing area stormwater capture point filled with leaves



Site observations – Huntly - Thursday 9/05/2024

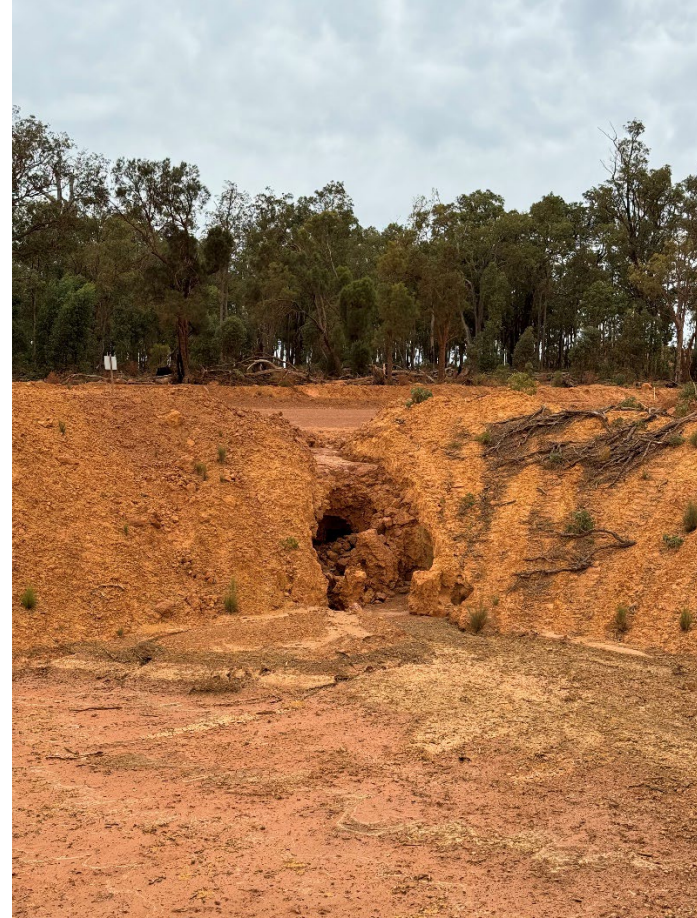
BC tree #1314 viewed at Ingpen 4



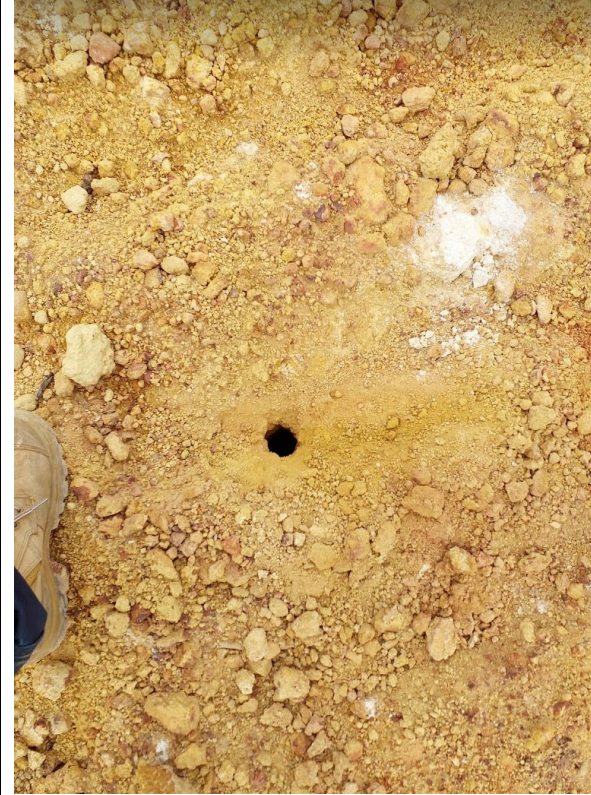
BC tree #2830 and #901 viewed from a distance at Ingpen 4



Road sump 3 with collapsed wall (next to BC tree #1314) at Ingpen 4



Exploration drill hole at Davey 5 (rehabbed). GPS coordinates are 424,520.83E 6,409,732.41N m. The hole has now been closed with a rock.



Erosion observed at Dellamaddalena 5 – photo from bottom of contour bowl looking up



Ponding in contour bowl at Dellamaddalena 5



Erosion at Dellamaddalena 5 – looking down to pond in contour bowl. At this point the erosion was ~1m deep.



Another erosion area at Dellamaddalena 5



Dellamaddalena 5 – contour bowl



Turbidity Monitor PD01 – Water observed to be clear and running



Slight erosion lines observed on track when walking down to Turbidity Monitor PD01.



Bush track to PD01 – slight water erosion lines observed



Ingpen 1 drainage area



Ingpen 1 drainage area



Ingen 1 drainage control trench



Ingen 5 contoured bowls and dc corrugation



MMP Compliance Findings Worksheet May 2024

Condition	Week 1 Date: 29/04/2024 – 6/05/2024 (Site verification 7/05/2024, 9/05/2024)	Week 2 Date: 06/05/2024 – 12/05/2024 (Site verification 14/05/2024, 15/05/2024, 16/05/2024)	Week 3 Date: 13/05/2024 – 19/05/2024. (Site verification 21/05/24, 22/05/24, 23/05/24)	Week 4 Date: 20/05/2024 – 26/05/2024 (Site verification 28/05/24, 29/05/24, 30/05/24)	Week 5 Date: 27/05/2024 – 02/06/2024 (Site verification 3,4,5,6,7/06/2024)
4. Environmental Objectives					
60-076783:M.1.4 (4) Any clearing, exploration, mining, or other operations permitted by this MMP approval must be implemented by Alcoa to meet the following environmental objectives: (a) avoiding or otherwise minimising clearing within 50 metres of Black Cockatoo nesting trees	This condition monitored as part of 5 (d) process	This condition monitored as part of 5 (d) process	This condition monitored as part of 5 (d) process	This condition monitored as part of 5 (d) process	This condition monitored as part of 5 (d) process
(b) avoiding or otherwise minimising discharge of environmentally hazardous material outside of containment infrastructure.	Site verification on the 9/05/2024 for drainage control was conducted at Ingpen 1, Ingpen 4, Ingpen 3, Davey 1 and Dellamadadena 5. No areas of concern were identified 6. cross The bottom boundary of the Ingpen 1 pit adjacent to the	Site verification for drainage control on the 15/05/2024 was conducted at Huntly at the following locations : <ul style="list-style-type: none"> • Marshall 3 • Mabbott 1 • Davey 1 • 3-4 m walls at the pit edge were observed at 	Site verification was conducted at Blacklock 14 at Huntly (within RPZ and 16% area and partially within the top 1km water level buffer). Drainage control was viewed to be good with pit walls approximately 3 metres high and new basins and trenches recently constructed within the pit. Some gully erosion was	Site verification was conducted at MCarthy7/Deworboise 1 at Huntly on the 29/05/2024. <i>A culvert under the road adjacent to the pit was observed to feed into the pit. A stream of water was observed around the edge of the pit boundary, as well as entering into the pit. Coordinates were taken as</i>	05/06/2024 – Huntly <u>Demarte 2</u> <ul style="list-style-type: none"> • DC within the pit at the <100% drainage capacity areas was good with pit edges approx. 2-3 metres tall. In the <25% drainage capacity areas, water was

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	<p>forested area was walked to identify any areas of drainage concern. Multiple areas including a trench within the pit and sumps were observed to be filled with water, however no areas of drainage concern were identified.</p> <p>Drainage control was inspected at Ingpen 4. Drainage control was viewed to be good, pits were contoured to contain water.</p> <p>Road sump 3 was observed to be collapsed. GPS waypoint was taken (20240509_waypoints.shp, rd sump with collapsed wall).</p> <p>Ingpen 5 was rehabbed and observed to have good</p>	<p>Marshall 3 before the forest boundary. Old ripping lines were also observed.</p> <p>However the pit was quite steep and marked as <25% dc capacity. There was no other measures in place for dc such as a pump. Ripping was also not on contour and would facilitate flow of water to the bottom of the pit.</p> <ul style="list-style-type: none"> Walls from the pit edge at Mabbott 1 ere approx. 2m high at the lowest point. White clay was observed to have been recently moved, as well as construction of a drainage basin towards the bottom of the pit. These were reported to 	<p>sighted in the pit but this looked older than the newly constructed drainage basin and trench and would feed into the newly constructed drainage control areas.</p> <p>During site inspection, 2 open blast holes were sighted. GPS points and photos were taken and blast holes were plugged with rocks.</p>	<p>(411,854.48E 6,404,882.12N m) <i>Some water was also found to be pooling inside corrugation close to forest edge gps point taken (411,648.27E 6,404,798.08N m) potential for this to spill into forest with heavier rain.</i></p>	<p>observed to be flowing to a contoured lower point in the middle of the pit. Further drainage control may be needed in this area to prevent water from entering rehabbed areas during heavier rainfall.</p> <p><u>Demarte 5</u></p> <ul style="list-style-type: none"> Drainage control viewed was good – some water was within the pit but captured in low contoured area of the pit. A new trench was sighted at the pit edge which had approx. 20cm of water inside. Pit walls were approx. 3-5 m tall. <p><u>Rance 6</u></p> <ul style="list-style-type: none"> DC within the <100% drainage capacity area

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	<p>drainage control in place, contoured pit and bowls.</p> <p>Davey 1 was observed to have new trenches in previously marked <25% drainage containment areas as well as new ripping. The edge of the pit adjacent to the forested edge was viewed to have adequate drainage control in place.</p> <p>Dellamadadena was observed to have to major drainage erosion lines which at some points were approximately 1m deep. These streamlines fed into a contour bowl. Further erosion was also observed around the Dellamadadena track. This pit was already rehabilitated.</p>	<p>have occurred after the large rainfall event on the 02/05/2024. A drainage sump with a pump and sensors was also observed within the pit. This was partially filled with water. Some faint erosion lines were evident on cleared pit border area, however these stayed in the middle of the cleared border and did not enter he forested area.</p> <ul style="list-style-type: none"> Newly installed 4 stage sump system at Davey 1 was observed. This was reported to be a mix of new sumps as well as upgrades to pre-existing sumps. A partially filled trench within the pit was also sighted. No AOC were noted. 			<p>was adequate – sighted trench and bowl. Some gully erosion was also sighted but that flow pathway was now blocked with a dirt wall.</p> <ul style="list-style-type: none"> In <25% and <50% drainage capacity area improved drainage control may be needed. Main drainage control in place is at sump/bowl at pit edge located at 32.428674 S, 116.177986E. Running water Sighted along bush track, followed to source which appeared to be a natural spring. Water did not originate from pit photo of dry dirt at pit taken for verification Path walked is tracked on gps.

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					<p>06/06/2024 – Huntly</p> <p><u>Hill 2</u></p> <ul style="list-style-type: none"> • gully erosion has formed at rehabbed edge of pit next to road. Gps coordinates at 32.427783 S, 116.107690 E • Gully erosion within pit feeding to contour bowl. Gps coordinates 32.427090 S, 116.106409 E • Runoff sighted along pit boundary and into fca area coordinates taken 32.425179 S, 116.104446 E– Area has been rehabbed <p><u>Inqpen 8</u></p> <p>DC within pit is good – sighted rocks in place for drainage control, boundary walls approximately 1 metre</p>

Condition	Week 1 Date: 29/04/2024 – 6/05/2024 (Site verification 7/05/2024, 9/05/2024)	Week 2 Date: 06/05/2024 – 12/05/2024 (Site verification 14/05/2024, 15/05/2024,16/05/2024)	Week 3 Date: 13/05/2024 - 19/05/2024. (Site verification 21/05/24 ,22/05/24, 23/05/24)	Week 4 Date: 20/05/2024 – 26/05/2024 (Site verification 28/05/24, 29/05/24, 30/05/24)	Week 5 Date:27/05/2024 – 02/06/2024 (Site verification 3,4,5,6,7/06/2024)
					tall and snipped wood in windrows. Walked pit boundary and no evidence of drainage failure found.
5. Restricted Activities					
60-076783:M.2.5 (5) Alcoa must not undertake any clearing, exploration, mining or other operations: – (a) within 1 km of the top water level margin of any water reservoir; or	A review of Sentinel-2 aerial imagery timelapse from 25/04/2024 to 5/05/2024 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.	Unable to review sentinel 2 aerial imagery due to cloud coverage.	A review of Sentinel-2 aerial imagery timelapse from 25/04/2024 to 15/05/2024 did not indicate new disturbance within 1 km of the top water level margin of any water reservoir.	Unable to review sentinel 2 aerial imagery due to cloud coverage.	Unable to review sentinel 2 aerial imagery due to cloud coverage.
(b) within the Serpentine Pipehead Dam Catchment Area or	A review of Sentinel-2 aerial imagery timelapse from 25/04/2024 to 5/05/2024 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.	Unable to review sentinel 2 aerial imagery due to cloud coverage.	A review of Sentinel-2 aerial imagery timelapse from 25/04/2024 to 15/05/2024 did not indicate new disturbance within Serpentine Pipehead Dam Catchment Area.	Unable to review sentinel 2 aerial imagery due to cloud coverage.	Unable to review sentinel 2 aerial imagery due to cloud coverage.

Condition	Week 1 Date: 29/04/2024 – 6/05/2024 (Site verification 7/05/2024, 9/05/2024)	Week 2 Date: 06/05/2024 – 12/05/2024 (Site verification 14/05/2024, 15/05/2024, 16/05/2024)	Week 3 Date: 13/05/2024 – 19/05/2024. (Site verification 21/05/24, 22/05/24, 23/05/24)	Week 4 Date: 20/05/2024 – 26/05/2024 (Site verification 28/05/24, 29/05/24, 30/05/24)	Week 5 Date: 27/05/2024 – 02/06/2024 (Site verification 3,4,5,6,7/06/2024)
(c) in any area that – (i) is within the prohibited zone associated with any water reservoir; and (ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%; or	A review of Sentinel-2 aerial imagery timelapse from 25/04/2024 to 5/05/2024 did not indicate new disturbance within in any area that – (i) is within the prohibited zone associated with any water reservoir; and (ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%;	Unable to review sentinel 2 aerial imagery due to cloud coverage.	A review of Sentinel-2 aerial imagery timelapse from 25/04/2024 to 15/05/2024 did not indicate new disturbance within in any area that – (i) is within the prohibited zone associated with any water reservoir; and (ii) has an average slope (based on the Landgate derived slope dataset) greater than 16%;	Unable to review sentinel 2 aerial imagery due to cloud coverage.	Unable to review sentinel 2 aerial imagery due to cloud coverage.
(d) within 10 metres of a black cockatoo nesting tree or a Huntly Mine black cockatoo significant tree; or	Site verification of BC trees at Huntly was carried out on the 07/05/2024. The following trees were sighted: <ul style="list-style-type: none"> #1314 at Ingpen 4 – was viewed. BC tree was a solitary tree on an island with no other trees or vegetation around it. The tree had an old thin metal tag on it with no number. 	Site verification of BC trees was carried out on the 15/05/2024 at Marshall 3 and Mabbott 1. The following BC trees were sighted: <ul style="list-style-type: none"> #1859 at Marshall 3. This tree was inside an uncleared forest area. BC tree 5664 was not found. This tree was marked to be ~5m from tree #1859 in BC nest 	Site verification of BC trees was carried out on the 23/05/2024 at Wittwer 3. BC tree #6339 was sighted in an undisturbed forested area. GDP boundaries at Kisler 9 and Manning 11 were walked. No potential black cockatoo trees were sighted in the area at Kisler 9, however one large tree was sighted at Manning 11 at (412,636.98E 6,408,085.57N m). Pictures provided below.	29/05/2024 - Huntly During site verification of Manning 2 GDP 156, no potential significant trees were sighted within the GDP area. Presence of BC tree #2442 (on tree island in the middle of the pit) was confirmed. BC tree 5778 was sighted at Deworboise 1/ MCarthy 7. The tree was in an uncleared area and had no metal tag. BC tree 6315 was sighted at Ingpen 2. The tree was in	5/06/2024 – Huntly <ul style="list-style-type: none"> Sighted BC tree #1284 at Rance 6 – tree didn't have metal tag but was marked with a H. Tree was in uncleared forest area Sighted BC tree #1459 on tree island in pit of Demarte 2. 6/06/2024 – Huntly

Condition	Week 1 Date: 29/04/2024 – 6/05/2024 (Site verification 7/05/2024, 9/05/2024)	Week 2 Date: 06/05/2024 – 12/05/2024 (Site verification 14/05/2024, 15/05/2024, 16/05/2024)	Week 3 Date: 13/05/2024 – 19/05/2024. (Site verification 21/05/24, 22/05/24, 23/05/24)	Week 4 Date: 20/05/2024 – 26/05/2024 (Site verification 28/05/24, 29/05/24, 30/05/24)	Week 5 Date: 27/05/2024 – 02/06/2024 (Site verification 3,4,5,6,7/06/2024)
	<ul style="list-style-type: none"> #2830 and #901 were viewed from a distance from within the pit. Trees were viewed to be on two small tree islands within the pit. #6328 at Ingpen 5 – was observed to be within a forested undisturbed area greater than 10 m from the pit edge 	<p>trees data (BC_NestTrees_20240422)</p> <ul style="list-style-type: none"> BC tree #1378 was sighted at Mabbott 1. The tree was located in an uncleared forest area. 		<p>an uncleared area and had no metal tag.</p>	<ul style="list-style-type: none"> sighted BC tree# 1259 on tree island at Hill 2 - part of tree has fallen and tag has been burnt off but tree is still alive and has growth at foot of tree. Sighted bc tree #1850 in fca uncleared area. Tree had tag. The top part of tree had fallen off.
(e) on or after 1 January 2027, within 50 metres of a black cockatoo nesting tree.	NA till 2027	NA till 2027	NA till 2027	NA till 2027	NA till 2027

Water pooled on bush track used to access turbidity monitor SE61T



Minor erosion on walking track to SE61T



BC tree 1378 at Mabbot 1



Trench with Pump at Mabbott 1



Fresh clay moved for drainage control at Mabbott 1



Drainage basin at Mabbott 1



Trench at Mabbott 1



Drainage sump at davey 1



BC tree 1859 at Marshall 3



Appendix F Ground Disturbance Permit Master Spreadsheet

Permit ID	Mine Site	Activity	Clearing ID	Area (ha)	Within Section 6 Area	Approval	Pit ID	Approved/Denied	Date of Approval	Clearing Complete (Y/N)
GDP_00007	Huntly	Clearing	D04/21	10.4	Yes	MMP	Ingpen 8	Approved	12/12/2023	Y
GDP_00052	Huntly	Clearing	D77/13	1.73	Yes	MMP	Stone 6	Approved	29/04/2024	N
GDP_00053	Huntly	Clearing	D76/13	1.39	Yes	MMP	Parker 2	Approved	6/06/2024	N
GDP_00054	Huntly	Clearing	D16/17, D09/20, D136/13	5.22	Yes	MMP	Ingpen 2	Approved	29/04/2024	N
GDP_00055	Huntly	Clearing	D80/13	0.57	Yes	MMP	Kisler 11	Approved	10/05/2024	N
GDP_00057	Huntly	Clearing	D32/14 D21/17	1.4	Yes	MMP	Rance 1	Approved	29/04/2024	N
GDP_00060	Huntly	Clearing	D49/18	0.53	Yes	MMP	Blacklock 15	Approved	9/05/2024	N
GDP_00062	Huntly	Clearing	D57/19, D56/19	0.76	Yes	MMP	Downes 1-3	Approved	9/05/2024	N
GDP_00064	Huntly	Clearing	D25/15	0.82	Yes	MMP	Manning 11	Approved	10/05/2024	N
GDP_00065	Willowdale	Clearing	23-F5503-4	15.15	No	MMP	Central 4	Approved	23/02/2024	Y
GDP_00066	Willowdale	Clearing	23-F5503-1, 23-F5503-2, 23-F5427-1, 23-F5427-2, 23-F5427-3, 23-F5427-4	24.93	No	MMP	Central 3	Approved	23/02/2024	N
GDP_00067	Willowdale	Clearing	23-F5426-1, 23-F5426-2	4.95	No	MMP	Blaxland 10	Approved	23/02/2024	N
GDP_00068	Willowdale	Clearing	23-F5515-1, 23-F5515-2, 23-F5515-3, 23-F5519-1, 23-F5519-2, 23-F5519-3, 23-F5520-1, 23-F5520-2, 23-F5520-3, 23-F5523-1, 23-F5523-2, 23-F5523-3, 23-F5523-4	59.4	No	MMP	Flinders 1-6	Approved	28/03/2024	N
GDP_00069	Willowdale	Clearing	23-G5525-1, 23-G5525-2	23.45	No	MMP	Oxley 6, 9 and 10	Approved	6/05/2024	N
GDP_00070	Willowdale	Clearing	23-F5527-1, 23-F5527-2	1.74	No	MMP	Bass 1	Approved	6/05/2024	N
GDP_00082	Willowdale	Clearing	23-F5611-2	1.3	No	MMP	Bass 4	Approved	17/06/2024	N
GDP_00083	Willowdale	Clearing	23-F5611-1	5.55	No	MMP	Bass 5	Approved	28/03/2024	N
GDP_00084	Willowdale	Clearing	23-F5513-1, 23-F5513-2, 23-F5519-3	19.6	No	MMP	Flinders 9	Approved	29/05/2024	N
GDP_00086	Huntly	Clearing	D07/20	0.12	Yes	MMP	Roberts 10	Approved	15/05/2024	N
GDP_00087	Huntly	Clearing	D74/19, D28/16	1.65	Yes	MMP	Manning 17	Approved	15/05/2024	N
GDP_00088	Huntly	Clearing	D74/19	1.01	Yes	MMP	Warburton 1	Approved	15/05/2024	N
GDP_00090	Huntly	Clearing	D30/19	1.38	Yes	MMP	Downes 16	Approved	10/05/2024	N
GDP_00096	Willowdale	Clearing	Conveyor 374	1.065	No	MMP	Conveyor 374	Approved	28/03/2024	N
GDP_00109	Huntly	Clearing	D30/20	1.78	Yes	MMP	Kisler 9	Approved	10/05/2024	N
GDP_00110	Huntly	Clearing	D20/19	3.08	Yes	MMP	Rhodes 5	Approved	10/05/2024	N
GDP_00111	Huntly	Clearing	D34/15	2.35	Yes	MMP	Stone 3	Approved	29/04/2024	N
GDP_00115	Huntly	Clearing	D122/21, D123/21	10.2	No	MMP	Wittwer 3	Approved	10/05/2024	N
GDP_00116	Huntly	Clearing	D76/13	0.9	No	MMP	Macquarrie 1	Approved	15/05/2024	N
GDP_00117	Huntly	Clearing	D22/18	0.22	No	MMP	Warburton 3	Approved	15/05/2024	N
GDP_00121	Huntly	Clearing	D26/15	0.88	No	MMP	Marshall 4	Approved	15/05/2024	N
GDP_00123	Willowdale	Clearing	23-F5503-4	1.26	No	MMP	Central 4	Approved	11/06/2024	N
GDP_00128	Huntly	Clearing	D124/21	1.64	No	MMP	Wittwer 4	Approved	12/06/2024	N
GDP_00129	Huntly	Clearing	D21/18	0.97	No	MMP	Ellar 3	Approved	6/06/2024	N
GDP_00133	Huntly	Clearing	D49/18	1.09	No	MMP	Blacklock 15/16	Approved	27/05/2024	N
GDP_00138	Huntly	Clearing	D104/13	0.54	No	MMP	Kisler 10	Approved	16/05/2024	N
GDP_00139	Huntly	Clearing	D16/17	1.4	No	MMP	Ingpen 4	Approved	16/05/2024	N
GDP_00144	Huntly	Clearing	D27/16 D10/19 D05/20	10.67	No	MMP	Roberts 15, Manning 10	Approved	27/05/2024	N
GDP_00154	Huntly	Clearing	D19/19	4.67	No	MMP	McCarthy 1	Approved	15/5/2024	N
GDP_00156	Huntly	Clearing	D67/13	0.86	No	MMP	Manning 2	Approved	15/05/2024	N
GDP_00157	Huntly	Clearing	D30/15	2.5	No	MMP	Kisler 10	Approved	15/05/2024	N
GDP_00158	Huntly	Clearing	D47/17	0.91	No	MMP	Kisler 9	Approved	27/05/2024	N
GDP_00161	Huntly	Clearing	D127/21	3.61	No	MMP	Wittwer 8	Approved	15/05/2024	N
GDP_00162	Huntly	Clearing	D45/17	2.11	No	MMP	Mabbott 2	Approved	27/05/2024	N
GDP_00163	Huntly	Clearing	D125/21	3.9	No	MMP	Iannetta 2	Approved	27/05/2024	N
GDP_00165	Huntly	Clearing	D103/13	1.27	No	MMP	Downes 10 Schou 1	Approved	6/06/2024	N
GDP_00166	Huntly	Clearing	D62/19	1.68	No	MMP	Roberts 8	Approved	27/05/2024	N
GDP_00167	Huntly	Clearing	D121/20	0.42	No	MMP	Rhodes 9	Approved	27/05/2024	N
GDP_00168	Huntly	Clearing	D19/20	1.07	No	MMP	Karri 18	Approved	27/05/2024	N
GDP_00169	Huntly	Clearing	D136/13	0.48	No	MMP	Hills 1 Marshall 7	Approved	12/06/2024	N
GDP_00171	Huntly	Clearing	D67/13	0.52	No	MMP	Manning 2	Approved	6/06/2024	N
GDP_00172	Huntly	Clearing	D20/19	0.3	No	MMP	Rhodes 7	Approved	12/06/2024	N
GDP_00173	Huntly	Clearing	D56/19	1.01	No	MMP	Downes 3	Approved	12/06/2024	N