

Annual Compliance Report EPBC 2023/09471 - Lynas Find Project

Reporting Period 13/03/2025 to 12/03/2026

March 2026

PLS

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1 INTRODUCTION

The Pilgangoora Operation is located 80km SSE from Port Hedland, Western Australia in the Pilbara region. The project is situated within the Shire of East Pilbara and on the Wallarenya Pastoral lease (Figure 1-2). The Lynas Find Project (this report) is located approximately 5 km to the north of the existing operations.

The Lynas Find Project consists of an open pit mine and waste rock landform (WRL), as well as miscellaneous supporting infrastructure including transport corridors and topsoil stockpiles. Ore removed from the Lynas Find pit will be processed at the current Pilgangoora site (Figure 1-1).

Initial environmental surveys for Lynas Find identified the presence of Northern Quoll habitat (*Dasyurus hallucatus*) in the proposed project footprint, and consultation was commenced with both the Western Australian Environmental Protection Authority (EPA) and the Commonwealth department of Climate Change, Energy, Environment and Water (DCCEEW) for potential assessment under the Western Australian *Environmental Protection Act* (1986) (EP Act) and the *Environmental Protection and Biodiversity Conservation Act* (1999) (EPBC Act) as a controlled action.

PLS Group Limited (PLS or formerly Pilbara Minerals Ltd) ACN:112425788 Lynas Find Project, Pilbara region, WA (EPBC 2023/09471) became live from 13th March 2025. The approval has a series of conditions, which is outlined in this report and compliance against these conditions.

The approved action is as follows:

To construct and operate an open pit mine which involves land clearing, site preparation, drilling, blasting, excavation, haulage of material mine closure and rehabilitation, located 80km SSE from Port Hedland, Pilbara Region, Western Australia.

The Approved Action is a component of a larger project-the Pilgangoora Project, operated by PLS since 2017. The Approved Action includes construction of an open pit mine (Lynas Find Pit) and Waste Rock Landform (WRL) (Lynas Find WRL) to the north of the current Pilgangoora operations, as well as necessary supporting infrastructure including access and haul roads, laydown areas and topsoil stockpiles. A layout plan has been provided as Figure 1-1, and includes the proposed open pit, waste dump and development envelope.

Waste rock will be transported by haul truck to the Lynas Find WRL, ore will be transported to the existing Pilgan Processing Plant for processing.

The Approved Action includes a development Envelope of 394.86 ha, of which 26.32 ha will comprise of open pit disturbance, and 61.02 ha of disturbance for the WRL, totalling 87.34 ha of total disturbance. Included in the proposed disturbance footprint is a buffer of approximately 23 ha, which allows peripheral disturbance for low impact infrastructure such as access roads and topsoils stockpiles.

Within the Development Envelope, 37.54 ha will be classified as an avoidance area, which will not be disturbed by PLS mining activities. This area includes rocky ridges that have the potential to be utilised as denning habitat for the nationally threatened species, the Northern Quoll, and as such, all efforts will be taken to preserve this habitat.

2 PURPOSE

Condition 38 of EPBC 2023/09471 requires that an Annual Compliance Report (ACR) detailing the previous twelve-month period is prepared and submitted to the Department of Climate Change, Energy, the Environment and Water (DCCEEW). The assessment review period for this ACR is 13 March 2025 to 12th March 2026. The ACR has been prepared in accordance with the DCCEEW's Annual Compliance Reporting Guidelines (2023) in compliance with Condition 38.

The purpose of this report is to document compliance for the reporting period with conditions under EPBC 2023/09471 as required by the conditions outlined below.

“ANNUAL COMPLIANCE REPORTING”

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

39. The approval holder must ensure each compliance report includes:

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

i) each condition attached to this approval decision, and

ii) all commitments made in each plan

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

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

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

40. The approval holder must ensure each compliance report is completed to the satisfaction of the Minister and is consistent with the *Annual Compliance report Guidelines, Commonwealth of Australia 2023*.

41. The approval holder must, within 20 business days following the end of each ACR period, in a format that is easily accessible and downloadable, publish on the website:

a) each compliance report, and

b) a shapefile showing all clearing of protected matters, and their habitat, undertaken within the ACR period.

The compliance status and updates are provided in the Compliance Audit table (Table 1-1)

3 DESCRIPTION OF ACTIVITIES

All clearing within the reporting period has been associated with the Lynas Find haul road and Exploration drilling (Plate 1 and 2). The Lynas Find Haul Road has a total area cleared of 1.89 hectares during the reporting period. Topsoil has yet to be rehandled to the approved topsoil area, pending machinery availability.



Plate 1 Lynas Find Haul Road clearing



Plate 2 Exploration track and drill pad (since cleared). Exploration clearing consisted of 5 drill pads with associated tracks totalling 0.49 hectares. Topsoil was left in-situ and will be used in the future rehabilitation of the pads and tracks.

Works will continue throughout 2026 to develop the Lynas Find Haul Road, to allow access to construct the future pit and waste dump. Other activities throughout the reporting period include:

- Survey work been completed by ERM for the Northern Quoll (*Dasyurus hallucatus*) during the reporting period, as per monitoring requirement commitment of the approved Northern Quoll Management Plan.
- Survey work has also been completed for the Ghost Bat (*Macroderma gigas*) and the Pilbara Leaf Nosed Bat (*Rhinoicteris aurantia*) by ERM and Supersensory Technologies during the reporting period (Reports pending).
- Vegetation monitoring has been completed by Ecotec
- Weed control throughout the development envelope by PLS and Ecotec.
- Monitoring of installed monitoring bores
- Installation of 'Environmentally Sensitive Area' signage.

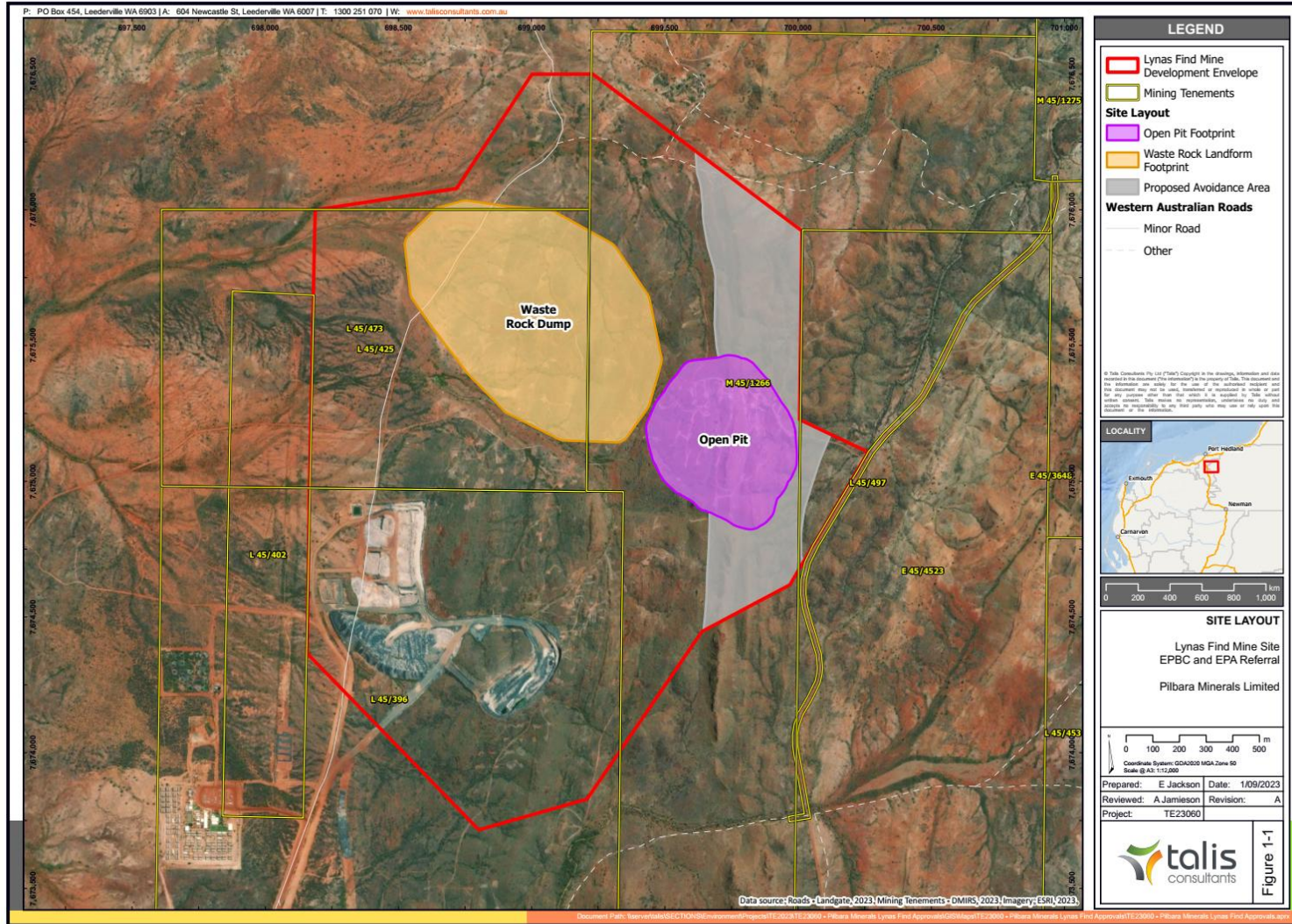


Figure 1-1 Lynas Find Project Development area

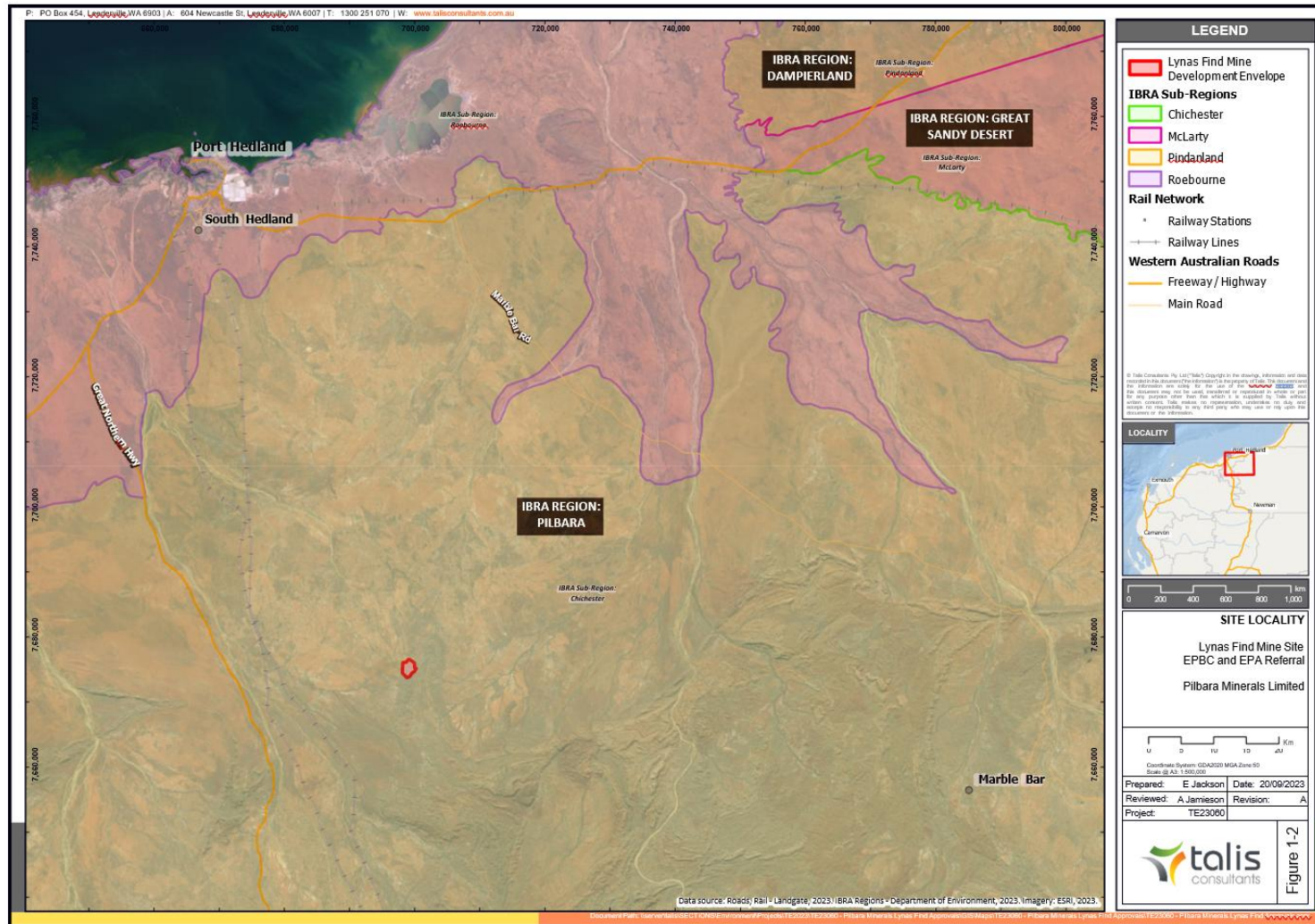


Figure 1-2 Lynas Find Project Site Locality



4 APPROVAL CONDITIONS

Condition Number/reference	Condition	Is the project compliant with this condition? <i>Compliant</i> <i>Non-compliant</i> <i>Not applicable</i>	Evidence/Comments								
1	The approval holder must not:										
	a) Clear outside of the development envelope.	Compliant	No clearing outside of development envelope (Attachment 1-Lynas Find Clearing and Construction Envelope) Note: Historical clearing has occurred outside of the development envelope, prior to the approval as part of previously approved mining operations.								
	b) Construct outside of the development envelope.	Compliant	No construction outside of development envelope (Attachment 1-Lynas Find Clearing and Construction Envelope) Note: Historical construction has occurred outside of the development envelope, prior to the approval as part of previously approved mining operations.								
2	The approval holder must not clear more than:										
	a) a combined total of 87.34 hectares (ha) of native vegetation within the development envelope	Compliant	<table border="1"> <thead> <tr> <th>Combined Total Native Vegetation</th> <th>Clearing of Native Vegetation 2026</th> </tr> </thead> <tbody> <tr> <td>87.34 ha</td> <td>2.09 ha</td> </tr> <tr> <th>Northern Quoll Critical Habitat</th> <th>Clearing of Northern Quoll Critical Habitat</th> </tr> <tr> <td>4.62 ha</td> <td>0 ha</td> </tr> </tbody> </table>	Combined Total Native Vegetation	Clearing of Native Vegetation 2026	87.34 ha	2.09 ha	Northern Quoll Critical Habitat	Clearing of Northern Quoll Critical Habitat	4.62 ha	0 ha
	Combined Total Native Vegetation	Clearing of Native Vegetation 2026									
87.34 ha	2.09 ha										
Northern Quoll Critical Habitat	Clearing of Northern Quoll Critical Habitat										
4.62 ha	0 ha										
b) 4.62 ha of Northern Quoll critical habitat;	Compliant										



	<p>c) 82.72 ha of Northern Quoll supporting habitat;</p>	Compliant	Northern Quoll Supporting Habitat	Clearing of Northern Quoll Supporting Habitat
			87.72 ha	0.89 ha
	<p>d) 5.56 ha of Pilbara Leaf-nosed Bat supporting habitat.</p>	Compliant	Pilbara Leaf-nosed Bat supporting habitat	Clearing of Pilbara Leaf-nosed Bat supporting habitat
			5.56 ha	0.37 ha
<p>Attachment 1-Lynas Find Clearing and Construction Envelope Note: Compliant as per section 2.1, 2.2.1.1 of EMP</p>				
<p>3</p>	<p>To avoid and mitigate harm to the Northern Quoll and its habitat, the approval holder must:</p>			
	<p>a) Not disturb, clear, construct, or take any part of the Action that may cause harm to protected matters in the avoidance area.</p>	Compliant	<p>No disturbance, clearing, construction has taken part in the avoidance area.</p> <p>Attachment 1 -Lynas Find Clearing and Construction Envelope</p>	
	<p>b) Allow only personnel required to survey or monitor the Northern Quoll population to ensure protected matters are not harmed in the avoidance area.</p>	Compliant	<p>PLS Fauna licensed personnel only conducted on ground surveys (Licence TFA-2425-0239) and Fauna Taking (Relocation) Licence FR28000497</p> <p>Attachment 2-PLS Fauna Licence/s</p>	
	<p>c) Ensure that the avoidance area continues to provide a habitat corridor for dispersal of Northern Quoll by excluding any disturbance from the avoidance area and maintaining its habitat quality.</p>	Compliant	<p>Avoidance area continues to provide a habitat corridor as no clearing has occurred.</p> <p>Ongoing monitoring required.</p> <p>Managed by the comprehensive Land Use Certificate (LUC) process for all clearing applications.</p>	



d) Conduct a pre-clearance survey less than 24 hours prior to any clearing and ensure that any Northern Quoll individual recorded during the pre-clearance survey is immediately trapped and released to nearby appropriate habitat by a suitably qualified fauna handler.

Compliant

All clearing has been conducted under the internal LUC. A requirement of this is a 24-hour pre-clearance survey by licensed personnel. All surveys have been:

- GPS tracked
- Photographic evidence and analysis of findings
- Entered into the database and tracking register
- Completed by licenced personnel

Attachment 3 Lynas Find Haul Road Fauna Survey 1-3

Note: No Northern Quoll have been recorded for any approved clearance walks during the reporting period.

e) Ensure that targeted surveys to determine the population status of Northern Quoll in the development envelope are undertaken by a suitably qualified field ecologist at least once in every three years.

Compliant

Survey conducted by Terrestrial Ecosystems in August 2019. **(Attachment 4-Northern Quoll Survey TE)**

Survey conducted by Ecotec and Animal Plant Mineral (APM) in August 2022. **(Attachment 5-Lynas Find Biological Survey Ecotec/APM)**

Survey conducted by Environmental Resources Management Australia Pty Ltd (ERM) in July 2025. Report includes reference to populations densities (page 21 of attachment 6).

Attachment 6-ERM Flora and Fauna survey

All survey work completed by highly experienced and qualified Ecologists (listed in attachment 7). Recent survey including the Lynas Find project area by ERM was conducted under this Fauna licence **TFA-2425-0194 (Attachment 7-ERM Fauna licence)**.



Note: Fauna licence area map to be referenced in conjunction with Attachment 6-ERM Flora and Fauna survey area map.

<p>f) Undertake progressive clearing to retain protected matters habitat for as long as possible.</p>	<p>Compliant</p>	<p>Clearing is being staged by approximately 150m x 150m blocks. This is based on what a Dozer can clear in a 12 hr day shift.</p> <p>Minimal clearing has occurred to date.</p> <p>Attachment 3 Pre-clearance surveys-Lynas Find Project</p>
<p>g) Within 3 years of commencement of dumping, undertake progressive rehabilitation on Waste Rock Landforms to create suitable habitat for the Northern Quoll as outlined in the Section 6 of the Environmental Management Plan.</p>	<p>Not Applicable</p>	<p>No dumping has occurred to date.</p> <p>This will form part of future reports.</p> <p>Artificial Quoll Dens Scope of Work developed, outlining future trials.</p>
<p>h) Undertake monitoring, at least once each year, commencing within 4 years of the commencement of dumping, of the habitat quality of rehabilitated Northern Quoll habitat, in the development envelope, until the objectives relating to Northern Quoll habitat within the Environmental Management Plan (EMP) have been met.</p>	<p>Not Applicable</p>	<p>No dumping has occurred to date.</p> <p>Will form part of future reports.</p>



4	<p>If the approval holder detects the presence, where likely to be affected by the Action, of any protected matter or the habitat of any protected matter not previously reported to the department as part of the referral of this Action or in accordance with this condition, the approval holder must:</p> <p>a) notify the department in writing of the presence and likely extent of any protected matter or the habitat of any protected matter not previously reported to the department within 10 business days of detecting the presence of any protected matter or the habitat of any protected matter not previously reported to the department, and</p> <p>b) not clear any area where the protected matter or the habitat of the protected matter is located unless:</p> <p>i) condition 2 provides for the clearing of that protected matter or habitat of that protected matter, and</p> <p>ii) clearing does not exceed the limit specified in condition 2 for that protected matter or habitat of that protected matter.</p>	Not Applicable	<p>No new protected matters or habitats of protected matters identified.</p> <p>Ongoing survey work is currently underway.</p>
5	<p>To avoid and mitigate harm as a result of the Action on protected matters, the approval holder must commence implementing the Environmental Management Plan (EMP) no later than the commencement of the Action and continue to implement the EMP until the Minister has approved a Revised EMP.</p>	Compliant	<p>Environmental Management Plan being implemented with the commencement of clearing (Lynas Find Haul Road)</p> <p>All conditions of the EMP are being followed as outlined in this report.</p>
6	<p>By implementing the EMP or the Revised EMP, the approval holder must achieve the following environmental outcomes for the protected matters:</p>		



a) No decrease to the local geographic distribution of the Northern Quoll.	Compliant	Ongoing monitoring and survey work commenced. Monitoring data will enable confirmation of outcomes.
b) No decrease to the abundance of Northern Quoll in the development envelope and no decline in population condition through the measurement of the health condition index (HCI) of captured females of the Northern Quoll.	Compliant	Ongoing monitoring and survey work commenced. Monitoring data will enable confirmation of outcomes.
c) No significant decrease to the level of activity or presence of Pilbara Leaf-nosed Bat in the development envelope.	Compliant	Ongoing monitoring and survey work required. Current surveys as per Critical Species Bat Management Plan (CSBMP) commenced 2nd March 2026 with SuperSensory Consultancy. Bat detectors(7) and Acoustic Lures(10) deployed as per requirements of the CSBMP.



7	By implementing the EMP or the Revised EMP, the approval holder must:		
	a) Minimise loss or degradation of habitat.	Compliant	<p>Land Use Certificate process and progressive clearing adopted (staged clearing).</p> <p>Clearing is kept to minimum and governed by mining constraints i.e. haul road widths</p> <p>As per section 2.2.1.1 of the EMP.</p>
	b) Minimise risk of habitat fragmentation and edge effects.	Compliant	<p>Land Use Certificate process and progressive clearing adopted (staged clearing).</p> <p>Clearing is kept to minimum and governed by mining constraints i.e. haul road widths</p> <p>As per section 2.2.1.2 of the EMP.</p>
	c) Reduce risk of faunal displacement and death.	Compliant	<p>Education of workforce through toolbox, pre-start meetings, posters, signage, speed limits.</p> <p>Ongoing monitoring and survey work.</p> <p>Elimination of barbed wire on site to reduce likelihood of fauna deaths i.e. bat species</p>
	d) Reduce impacts from dust, noise, vibration, light emission and fire.	Compliant	<p>Clearing of Haul roads at this stage.</p> <p>Dust is managed by Water carts. Dust monitors in place to monitor levels.</p> <p>As per section 2.2.1.3, 2.2.2.1 and 3.2.5 of the EMP.</p>
e) Prevent attraction of fauna and (both native and feral animals) to the development envelope, particularly storage areas of water and food wastes.	Compliant	<p>Implemented PLS Feral Animal Management plan.</p> <p>Implemented PLS Waste Management plan.</p>	



			<p>Management of landfill by contractor and as per operating licence L9056/2017/1 conditions.</p> <p>Cattle troughs installed on outer perimeter of development envelope.</p> <p>Water bodies (turkeys nests-lined pond) fenced</p> <p>As per section 3.2.4 of the EMP.</p>
f)	Minimise the introduction of weeds.	Compliant	<p>Weed and Seed Certificates in place.</p> <p>All clearing within the development envelope requires equipment to undergo comprehensive Weed and Seed checks as part of the LUC process.</p> <p>Control of weed species in development envelope ongoing-currently being conducted by Ecotec and PLS Environment Team March 2026.</p> <p>Annual vegetation condition monitoring completed by Ecotec March 2026.</p> <p>As per section 3.2.3 of the EMP.</p>
g)	Minimise alteration of surface water flows and surface water quality.	Compliant	<p>Conditions of the LUC - 'not to dam, divert surface water flows. Surface water sampling bottles installed in all major creek areas.</p> <p>Attachment 8-Surface Water Sampling Locations</p>
h)	Avoid impacts on groundwater ecosystems as a result of changes to groundwater quality.	Compliant	<p>PLS can demonstrate no changes to groundwater ecosystems as a result of changes to groundwater quality as per attachment</p>



Vegetation monitoring by PLS and Annual Ecotec
 vegetation monitoring completed March 2026.

**Attachment 8-Surface Water Sampling
 Locations**

Attachment 9-Lynas Find Monitoring Bores

As per section 2.2.2.2 of the EMP.

8	The approval holder must not exceed any threshold criteria related to protected matters specified in the EMP or the Revised EMP.	Not Applicable	No threshold criteria exceeded at this stage related to protected matters. Ongoing monitoring required.
9	In the event of any exceedance of a threshold criterion related to protected matters specified in the EMP or the Revised EMP, the approval holder must: a) notify the department of the exceedance within 2 business days of becoming aware of the exceedance, b) investigate to determine the cause of the exceedance and submit a report of the findings of this investigation to the department in writing within 20 business days of becoming aware of the exceedance.	Not Applicable	



10	Surface water and ground management	Not Applicable	No Waste Rock Landforms constructed during reporting period. Managed as per EMP Table 3-1
<p>To prevent sediment entering local creek systems, the approval holder must implement the bunding measures at the proposed Waste Rock Landform recommended at “Table 3-1: Management Measures” of the EMP. The approval holder must ensure that water captured within the bunding does not mix with water from the natural creek system. The approval holder must, at least once each year, ensure the integrity of the bund.</p>			
11	To better understand dewatering requirements to ensure that habitat for the protected matters is not impacted, the approval holder must:	Compliant	<p>LFMB001 LFMB002 LFMB004 LFMB005 Installed monitoring bores.</p> <p>Construction of bores</p> <p>Confirmed to DCCEEW on the 1st August 2025 by Maree Heath (PLS Approvals) to Terry Dalton (Approvals Compliance DCCEEW) via email construction of bores.</p>
<p>a) Install a minimum of 4 monitoring bores, prior to the commencement of the Action, within the vicinity of the proposed pit.</p>			
<p>Attachment 9-Lynas Find Monitoring Bores</p>			



	<p>b) Conduct monthly monitoring of groundwater levels and quarterly groundwater quality sampling. All the parameters specified at “Table 3-6: Groundwater Monitoring Parameters” must be measured in compliance with the monitoring frequency specified in Table 3-6.</p>	Compliant	<p>Completed as per Table 3.6. EMP</p> <p>Attachment 10 Groundwater SWL and Water quality Lynas Bores</p>
	<p>c) Establish a baseline of at least 2 years of data relating to water quality and level prior to commencement of mining below the water table and utilise the baseline data to establish standards to develop implementation of environmental controls.</p>	Not Applicable	<p>Water quality and SWL’s monitored since July 2025(6 months of data only).</p> <p>Ongoing monitoring as per EMP.</p> <p>Attachment 10 Groundwater SWL and Water quality Lynas Bores</p>
12	<p>The approval holder must, prior to commencement of mining below the water table, submit to the department for approval by the Minister a revised version of the EMP (a ‘Revised EMP’) that is informed by 2 years of monitoring data collected prior to mining below the water table. The approval holder must not commence mining below the water table until the Minister has approved the Revised EMP in writing or as per condition 23 of this approval. The approval holder must commence implementing the Revised EMP within 14 days of its approval and continue to implement the Revised EMP until the completion of the Action.</p>	Compliant	<p>Revised EMP not submitted to date, as this it not required (due to mining having not commenced).</p>



13	<p>To mitigate the harm to the protected matters and their habitat, in the event that any Potentially Acid Forming material (PAF) is encountered at any point throughout the life of the approval, the approval holder must incorporate management measures including encapsulation above measured groundwater level into a revised EMP to be submitted to the department within 40 business days of encountering the PAF. In the event that the approval holder is required by this condition to submit a Revised EMP to address PAF, the approval holder must implement the approved Revised EMP within 14 days of its approval and continue to implement the revised EMP until the completion of the Action.</p>	Not Applicable	<p>No mining at this stage of the operation. Future mining operations identifying PAF, management measures such as encapsulation will be implemented.</p>
14	<p>To compensate for the residual significant impacts of clearing Northern Quoll critical habitat and Northern Quoll supporting habitat and Pilbara Leaf-nosed Bat supporting habitat, the approval holder must make financial contributions to the Pilbara Environmental Offsets Fund (PEOF).</p>	Compliant	<p>First payment made on the 14/05/26 of \$16,120.05</p> <p>Attachment 11-PEOF payment</p>
15	<p>In contributing to the PEOF the approval holder must:</p>		
	<p>a) contribute funds toward an offset activity or activities that:</p>	Compliant	<p>First payment 14/05/26 of \$16,120.05 made.</p> <p>Attachment 11-PEOF payment</p>
	<p>i) reduces the rate of decline of the Northern Quoll and Pilbara Leaf-nosed Bat,</p>	Not Applicable	Ongoing monitoring required
	<p>ii) ensures viable populations of Northern Quoll and Pilbara Leaf-nosed Bat remain in the Pilbara region,</p>	Not Applicable	<p>Ongoing monitoring required</p> <p>Monitoring as per CSBMP requirements.</p>



iii) has specified outcomes and performance indicators; timeframes and milestones for their achievement,	Compliant	As per EMP
iv) includes sufficient monitoring to detect achievement of performance indicators, milestones, and the outcomes, and	Compliant	As per EMP
v) requires regular reporting to the approval holders of the outcomes of the offset activity or activities their funding has contributed towards.	Compliant	Ongoing
b) Prior to the commencement of the Action, make a payment of AUD 16,120.06 into the PEOF (which is a estimated as 10 per cent of the possible total contribution that will be paid into the PEOF for the entire Action), which will contribute towards achieving the requirements of Condition 15(a) of this approval,	Compliant	Tax invoice paid 14/05/25 Invoice number RI006549 Full amount \$16,120.05 made. Attachment 11-PEOF payment
i) Make biennial payments to the PEOF based on evidence of the actual clearing footprint in accordance with the timing specified in the Lynas Find Project Impact Reconciliation Procedure, which are equivalent to or greater than the value of the following amounts, by adjustment in accordance with the CPI from the date of this approval decision until the date on which the payment is made, of:	Compliant	First payment made 14 th May 2025 Biennial payment due May 2027.
ii) A minimum of \$3,306 AUD (excluding GST) per hectare of Northern Quoll critical habitat cleared.	Not Applicable	At this stage of the project no Northern Quoll critical habitat cleared.



	iii) A minimum of \$1,653 AUD (excluding GST) per hectare of Northern Quoll supporting habitat and Pilbara Leaf-nosed Bat supporting habitat cleared.	Compliant	Biennial payment will be calculated as per condition and paid in May 2027.
	c) Submit evidence of each payment made to the department within 10 business days of the date of making the payment. The initial 10% prepayment may be progressively and proportionately reconciled during the required subsequent payments to the PEOF.	Compliant	Tax invoice paid 14/05/25 Invoice number RI006549 Full amount \$16,120.05 Attachment 11-PEOF payment
	d) Provide details of progress towards, or achievement of, the outcomes specified under condition 15) a) of this approval for the Northern Quoll and Pilbara Leaf-nosed Bat in each compliance report submitted to the department.	Compliant	As per evidence provided under Condition 15.
16	The approval holder must write to the Minister, within 10 business days of being aware or having concerns, that the offset outcomes specified for the projects supported through the approval holder's payments to the PEOF may not be achieved for the Northern Quoll and Pilbara Leaf-nosed Bat.	Not Applicable	
17	Should the Minister determine that the PEOF is likely to fail for one or more protected matter(s), the Minister may write to the approval holder asking to provide evidence that failure has not occurred or is unlikely to occur and nominating a deadline by which this must be provided.	Not Applicable	



18	If, after considering any information provided by the approval holder, the Minister determines that the PEOF has failed for one or all species named in Condition 15 of this approval, the approval holder must submit for the Minister's approval, within 4 months of being notified by the Minister, an Offset Strategy consistent with the principles of the Environmental Offsets Policy to the satisfaction of the Minister.	Not Applicable
19	If the Offset Strategy has not been approved by the Minister in writing within 6 months of the notification by the Minister under condition 18 of this approval, and the Minister notifies the approval holder that the provided Offset Strategy is not suitable for approval, the Minister may, at least 2 months after so notifying the approval holder, approve a version of the Offset Strategy revised by the department.	Not Applicable
20	The approval holder must commence implementation of the approved Offset Strategy within 2 months of the approval of the Offset Strategy by the Minister in writing, or another time as agreed in writing by the Minister. The approval holder must implement the approved Offset Strategy for the life of the approval.	Not Applicable



21	<p>If the approval holder is required to prepare and submit an Offset Strategy for the Minister's approval under Condition 18 of this approval, the Offset Strategy must be prepared by a suitably qualified ecologist and provide a framework for how the residual significant impacts from the approved action on the Northern Quoll and Pilbara Leaf-nosed Bat will be offset. All commitments, including environmental outcomes, management measures, corrective measures, trigger values and performance indicators in the Offset Strategy must be SMART and based on referenced or included evidence of effectiveness. must include:</p> <ul style="list-style-type: none">a) how the strategy will achieve the outcomes required under condition 12(a) of this approval;b) how it accounts for relevant approved conservation advices, recovery plans and threat abatement plans;c) the party to be responsible for implementing the proposed offset(s);d) the location and nature of the proposed offset(s);e) objectives, outcomes, and timeframes for their achievement;f) budget;g) performance and completion criteria for evaluating conservation outcomes;h) project monitoring (with indicators and measures) capable of detecting progress towards and achievement of the required outcomes;i) reporting of specified outputs/offset activities, progress towards and achievement of the required	Not Applicable
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outcomes, and evaluation of appropriateness of measures implemented;

j) a description of the potential risks to the successful implementation of each proposed offset (including but not limited to environmental, administrative, financial, and governance risks);

k) a description of the measures that will be implemented to mitigate risk associated with each proposed offset and a description of the contingency actions that will be implemented if performance or completion criteria are not met;

a. processes to adaptively manage the proposed offset;

b. how the proposed offset is consistent with the Environmental Offsets Policy; and

c. how the approval holder will ensure that the measures to be implemented as part of the Offsets Strategy have no detrimental impact on any protected matters under the EPBC Act.



22	If the approval holder is required to prepare and submit an Offset Strategy for the Minister’s approval under Condition 18 of this approval, the approval holder must implement the Offset Strategy from the date it is approved until the expiry date of this approval	Not Applicable
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23	<p>The approval holder may choose to revise a plan required to be implemented under condition 5 without submitting it for approval under section 143A of the EPBC Act, if:</p> <ul style="list-style-type: none">a) the taking of the Action in accordance with the revised plan would be consistent with the approved Action,b) the taking of the Action in accordance with the revised plan would be consistent with the conditions attached to this approval,c) the taking of the Action in accordance with the revised plan would not be likely to have a new or increased impact, andd) the approval holder notifies the department electronically that it has prepared a revised version of the plan (the 'revised plan'). In notifying the department, the approval holder must specify each condition which references the plan and provide the department with:<ul style="list-style-type: none">i) an electronic copy of the revised plan,ii) an electronic copy of the revised plan marked up with track changes to show the differences between the plan and the revised plan,iii) a comprehensive explanation of all differences between the plan and the revised plan,iv) a declaration that the approval holder has read and understands the <i>Guidance on 'new or increased impact' relating to changes to approved management plans under EPBC Act environmental approvals</i>, Commonwealth of Australia 2017,	Not Applicable	EMP currently under review.
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- v) a comprehensive analysis and detailed discussion on the likelihood that taking the Action in accordance with the revised plan will not have, or will be not likely to have, a new or increased impact,
- vi) written notice of the date on which the approval holder will implement the revised plan (the 'revised plan implementation date'), being at least 30 business days after the date of providing notice of the revision of the plan, or a date agreed to in writing with the department, and
- vii) a copy of the compliance report for the latest ACR period and a statement of any relevant history of compliance (including non-compliance) in relation to the plan. The approval holder must commence implementation of the revised plan from the revised plan implementation date unless otherwise notified in writing by the Minister.



24	<p>If the Minister notifies the approval holder that the Minister is satisfied that the taking of the Action in accordance with a plan which has been revised without submitting it for the Minister's approval would be likely to have a new or increased impact, then:</p> <ul style="list-style-type: none">a) the approval holder's ability to choose to revise a plan without submitting the plan for Minister approval does not apply, or ceases to apply, in relation to the revised plan,b) the approval holder must implement the plan in force immediately prior to that revised plan or a version of the plan specified by the Minister in the notice, andc) the Minister may also notify that, for a specified period, the approval holder's ability to choose to revise a plan without submitting the plan for Minister approval does not apply for one or more specified plans.	Not Applicable
25	<p>The approval holder may, at any time by giving written notice to the department, revoke its choice to implement a plan which has been revised without submitting it for the Minister's approval. If the approval holder revokes the choice to implement a revised plan, the approval holder must implement the plan in force immediately prior to that revised plan.</p>	Not Applicable
26	<p>Wherever these conditions require the approval holder to submit any plan to the department, all such plans must be submitted to the department electronically.</p>	Not Applicable



27	<p>Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date:</p> <p>a) of this approval, if the version of the plan to be implemented is specified in these conditions,</p> <p>b) the plan is approved by the Minister in writing, if the plan requires the approval of the Minister,</p>	Compliant	
28	<p>The approval holder must keep all plans published on the website, in a format that is easily accessible and downloadable, from the first date which that plan must be published and until the expiry date of this approval. This requirement applies to all current and superseded versions of plans.</p>	Compliant	<p>A change of domain from Pilbara Minerals to PLS, resulted in this information being unavailable on the website for a period of approximately four months. Once this was identified it was rectified on 2nd April 2026.</p>
29	<p>The approval holder is required to exclude or redact sensitive biodiversity data from any version of a plan before that plan is published on the website or otherwise provided to a member of the public. If sensitive biodiversity data is excluded or redacted from a plan, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.</p>	Compliant	<p>All sensitive biodiversity data has been excluded.</p>
30	<p>The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days following commencement of the Action.</p>	Non-compliant	<p>Email sent 23rd March 2026-commencement date Clearing commenced 27th February 2026 Notification was 17 business days.</p>
31	<p>The approval holder must not commence the Action later than 5 years after the date of this approval decision.</p>	Compliant	<p>Action has commenced February 2026 with the construction of the haul road.</p>



32	The approval holder must notify the department electronically of the date of commencement of mining below the water table, within 5 business days following commencement of mining below the water table.	Not Applicable	No mining has commenced
33	The approval holder must maintain accurate and complete compliance records and document the procedure for recording and storing compliance records.	Compliant	Stored in database and on internal PLS drive
34	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.	Not Applicable	
35	The approval holder must ensure that any monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the <i>Guidelines for biological survey and mapped data</i> , Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing.	Compliant	As provided as attachments in this report.
36	The approval holder must ensure that any monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the <i>Guide to providing maps and boundary data for EPBC Act projects</i> , Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.	Compliant	As provided as attachments in this report.



37	The approval holder must submit all monitoring data, surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 20 business days of the next anniversary of the date of this approval decision except where otherwise specified in a plan.	Compliant	As provided as attachments in this report
38	The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period).	Compliant	As per this Annual Compliance Report 13th March 2025-12th March 2026(the Reporting period)
39	The approval holder must ensure each compliance report includes: a) accurate and complete details of compliance and any non-compliance with: i) each condition attached to this approval decision, and ii) all commitments made in each plan, b) a schedule of all plans in effect in relation to these conditions during the ACR period, c) accurate and complete details of how each plan was implemented during the ACR period, and d) if any incident occurred, accurate and complete details of each incident.	Compliant	As per this Annual Compliance Report 13th March 2025-12th March 2026(the Reporting period)
40	The approval holder must ensure each compliance report is completed to the satisfaction of the Minister and is consistent with the <i>Annual Compliance Report Guidelines</i> , Commonwealth of Australia 2023.	Compliant	Annual Compliance Report Guidelines Commonwealth of Australia 2023 consulted in the development of this report.



41	<p>The approval holder must, within 20 business days following the end of each ACR period, in a format that is easily accessible and downloadable, publish on the website:</p> <ul style="list-style-type: none"> a) each compliance report, and b) a shapefile showing all clearing of protected matters, and their habitat, undertaken within the ACR period. 	Compliant	<p>Annual Compliance Report submitted as pdf Attachment 15-shapefile of all clearing of protected matters.</p>
42	<p>The approval holder must:</p> <ul style="list-style-type: none"> a) Exclude or redact sensitive biodiversity data from each compliance report and shapefile published on the website or otherwise provided to a member of the public. b) If sensitive biodiversity data is excluded or redacted from a version of a compliance report published or otherwise provided to a member of the public, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public. 	Compliant	<p>Sensitive biodiversity data not included in this report</p>
	<ul style="list-style-type: none"> c) If sensitive biodiversity data is excluded or redacted from a version of a shapefile published or otherwise provided to a member of the public, submit the full shapefile to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public. 	Not Applicable	<p>Sensitive biodiversity data not included in this report</p>



43	The approval holder must notify the department electronically, within 5 business days of each date of publication that the compliance report has been published on the website. In this notification, the approval holder must provide the department with the web address for where the compliance report and related shapefile are published on the website.	Not Applicable	This is the first ACR and will be submitted prior to the due date 9 th April 2026. After this date, the ACR will be published on the PLS.com website.
44	The approval holder must keep each compliance report and related shapefile published on the website from the first date which that compliance report must be published and until the expiry date of this approval.	Not Applicable	Not yet submitted
45	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident. The approval holder must specify in each notification: a) any condition or commitment made in a plan which has not been, or may have not been, complied with, b) a short description of the incident, and c) the location (if applicable, including co-ordinates), date and time of the incident.	Not Applicable	No incidents recorded in reporting period



46	<p>The approval holder must provide to the department in writing, within 12 business days of becoming aware of an incident, the details of that incident. The approval holder must specify:</p> <ul style="list-style-type: none"> a) all corrective measures and investigations which the approval holder has already taken in respect of the incident, b) the potential impacts of the incident, c) the method and timing of any corrective measures that the approval holder proposes to undertake to address the incident, and d) any variation of these conditions or revision of a plan that will be required to prevent recurrence of the incident and/or to address its consequences. 	Not Applicable	No incidents recorded in the reporting period
47	<p>The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period.</p>	Not Applicable	Audit period due 2030 as per Condition 47.
48	<p>The approval holder must submit details of the proposed independent auditor and their qualifications to the department within 10 business days following the end of each audit period.</p>	Not Applicable	
49	<p>The approval holder must ensure the scope of each independent audit is sufficient to determine the compliance status for each condition of approval, and each commitment made in each plan.</p>	Not Applicable	



50	The approval holder must ensure the criteria for each independent audit and the undertaking of each independent audit are consistent with the Independent Audit and Audit Report Guidelines.	Not Applicable
51	The approval holder must submit an audit report to the department for written agreement from the department within 3 months following the end of each audit period, or as otherwise directed by the Minister in writing.	Not Applicable
52	The approval holder must ensure each audit report is completed to the satisfaction of the Minister and is consistent with the Independent Audit and Audit Report Guidelines to the extent that the Independent Audit and Audit Report Guidelines are consistent with these conditions.	Not Applicable
53	The approval holder must publish each audit report on the website, in a format that is easily accessible and downloadable, within 10 business days of the date the department agrees to that audit report in writing.	Not Applicable
54	The approval holder must notify the department within 5 business days of the date the audit report is published on the website. In this notification, the approval holder must provide the department with the web address for where the audit report is published on the website.	Not Applicable
55	The approval holder must keep each audit report published on the website from the first date which that audit report must be published and until the expiry date of this approval.	Not Applicable



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



ENVIRONMENTAL MANAGEMENT PLAN

1.4	Reporting of CS fauna species issues, events, and monitoring results will be undertaken to ensure communication and understanding of the actual measured impacts of the Proposed action on the CS fauna species in the area.	Compliant	No CS species events or issues during the reporting period. Monitoring results as per attachments in this report.
1.5	Environmental Training	Compliant	All personnel coming to site complete Environmental induction training-includes fauna component on CS species. Posters displayed on office walls of Critical species including Northern Quoll. Contractors or the workforce targeted are those that are most likely to come in contact with CS species.
2.2.1.3	Increased risk of feral animals, weeds and fire	Compliant	Feral Animal Management plan implemented Feral cat trapping programs successful to date (26 cats removed in 2025) Weed Management Plan implemented Weed and Seed inspections/Certificates Weed control in project area Fire breaks maintained. Fire response is by onsite ERT.
Table 3-1	Establishment of avoidance area surrounding rocky ridge habitat	Compliant	GIS layer created and used for all Land Use Certificate approvals



Prior to ground clearing, trapping for Northern Quoll will be undertaken within the denning habitat areas	Compliant	No clearing to date within the denning habitat areas. This will form part of this LUC requirement.
Further monitoring and assessment of conservation significant fauna will be undertaken	Compliant	Bat survey work completed March 2026 as per CSBMP Further survey work planned for all CS species.
No clearing outside of approved areas	Compliant	Clearing managed by LUC process with strict controls and conditions. No clearing outside of approved areas as of 1/03/26 All clearing equipment equipped with Minestar technology.
Clearing completed in a staged manner over the years of operation	Compliant	Clearing has been completed in 3 stages to date for the Lynas Find road.
No clearing undertaken without an approved LUC in place	Compliant	All clearing has been with an approved signed LUC with strict controls and conditions. Records maintained in INX(InControl)
No increase in weed infestations on site or within the avoidance zone	Compliant	Weed control completed by Ecotec March 2026 in project area (pending report). Ongoing monitoring required Attachment 16-Lynas Find Weed Hygiene Areas(proposed).
No increase in feral animal populations within the Development envelope	Compliant	Implementation of Feral Animal Management Plan Ongoing trapping programs in development area Ongoing monitoring of feral animals



At this stage undetermined if increase in feral animal populations in project area. Since implementation of the program sightings of cats have been fewer. All surveys to date have recorded cats in low numbers.

No unauthorised fires on site	Compliant	No fires reported outside of natural events
Avoidance zone to be barricaded and signed to prevent unauthorized access	Not Applicable	No mining has commenced Signage on order
No excessive noise emission from site	Not Applicable	No mining has commenced
Rehabilitation planning to commence on WRL within 3 years of commencement of waste rock dumping	Not Applicable	No mining has commenced
Northern Quoll present in provided habitat and rehabilitated areas	Not Applicable	
Bund/surface water diversion constructed around perimeter of the WRL made of competent rock	Not Applicable	

5 STATUS OF ENVIRONMENTAL MANAGEMENT PLANS

Condition 5 requires the approval holder to implement the approved Environmental Management Plan (EMP) no later than the commencement of the Action. Table 2 outlines compliance with the management objectives.

Table 2 Management measures and compliance

MANAGEMENT MEASURE	PERFORMANCE CRITERIA	COMPLIANT (Y/N/NA)	EVIDENCE
Establishment of avoidance area surrounding rocky ridge habitat	No disturbance within avoidance area	Y	QGIS Layer for LUC's Signage on order
Prior to ground disturbance or clearing, trapping for Northern Quoll will be undertaken within denning habitats	Trapping scheduled and undertaken for all clearing within denning habitat	Y	No clearing within denning habitat
Further monitoring and assessment of conservation significant fauna will be undertaken	Targeted conservation significant species surveys to be carried out triennially	Y	Bat monitoring completed March 2026(Super Sensory)
Disturbance to native vegetation will be constrained within clearing boundaries, and minimised	No clearing outside of approved areas	Y	Clearing has occurred within approved areas only
Clearing will be undertaken progressively to retain habitat for as long as possible	Clearing completed in a staged manner over the years of operation	Y	Clearing has been in stages
Internal Land Use Certificates (LUC's) will be required prior to clearing activities commencing	No clearing undertaken without an approved LUC in place	Y	All clearing has been approved under the LUC system
Existing weed infestations on site will be effectively managed to reduce spread and overall density, and hygiene areas will be established around the avoidance zone.	No increase in weed infestations on site or within the avoidance zone	Y	Weed control being completed by PLS Weed control by Ecotec March 2026 Signage on order and hygiene areas selected for avoidance zone
Feral animal management program to be implemented by site staff	No increase in feral animal populations within the Development Envelope	Y	Feral Animal Management Plan implemented
Fires on site to be banned, except for emergency response training in low fire risk conditions	No unauthorised fires on site	Y	No records of unauthorised fires on site in reporting period
In order to avoid fauna mortalities, only authorised vehicles will be permitted on site, and no vehicles will be permitted to enter the avoidance zone outside of emergency conditions	Avoidance zone to be barricaded and signed to prevent unauthorised access	Y	All vehicles on site approved Signage on order for avoidance zone

Equipment is designed to meet occupational noise standards (85 dB over 8 hours, or 140 dB peak), and minimise noise emissions where possible	Noise emissions of plant and equipment to meet noise standards No excessive noise emissions from site	N/A	Mining has not yet commenced
Progressive rehabilitation to be undertaken on landforms	Rehabilitation planning to commence on WRL within 3 years of commencement of waste rock dumping	N/A	Mining has not yet commenced
Rehabilitation of landforms and other cleared areas are to include fauna habitat creation, with investigation into areas suitable to support Northern Quoll	Northern Quoll present in provided habitat and rehabilitated areas.	N/A	Mining has not yet commenced
Bunding of the Lynas Find WRL to prevent loss of sediment to local creek systems	Bund/surface water diversion constructed around the perimeter of the WRL made of competent rock. Water to be captured and does not mix with water from the natural creek system	N/A	Mining has not yet commenced
Additional groundwater monitoring to further understand dewatering requirements	Installation of 4 monitoring bores within the vicinity of the proposed pit	Y	Monitoring bores installed and monitored since July 2026.

6 NON-COMPLIANCES

One non-compliance has been identified during the reporting period(Condition 30)

7 NEW ENVIRONMENTAL RISK

No new environmental risks were identified during the reporting period.

8 OTHER INFORMATION

All information provided in this report and as per attachments.