



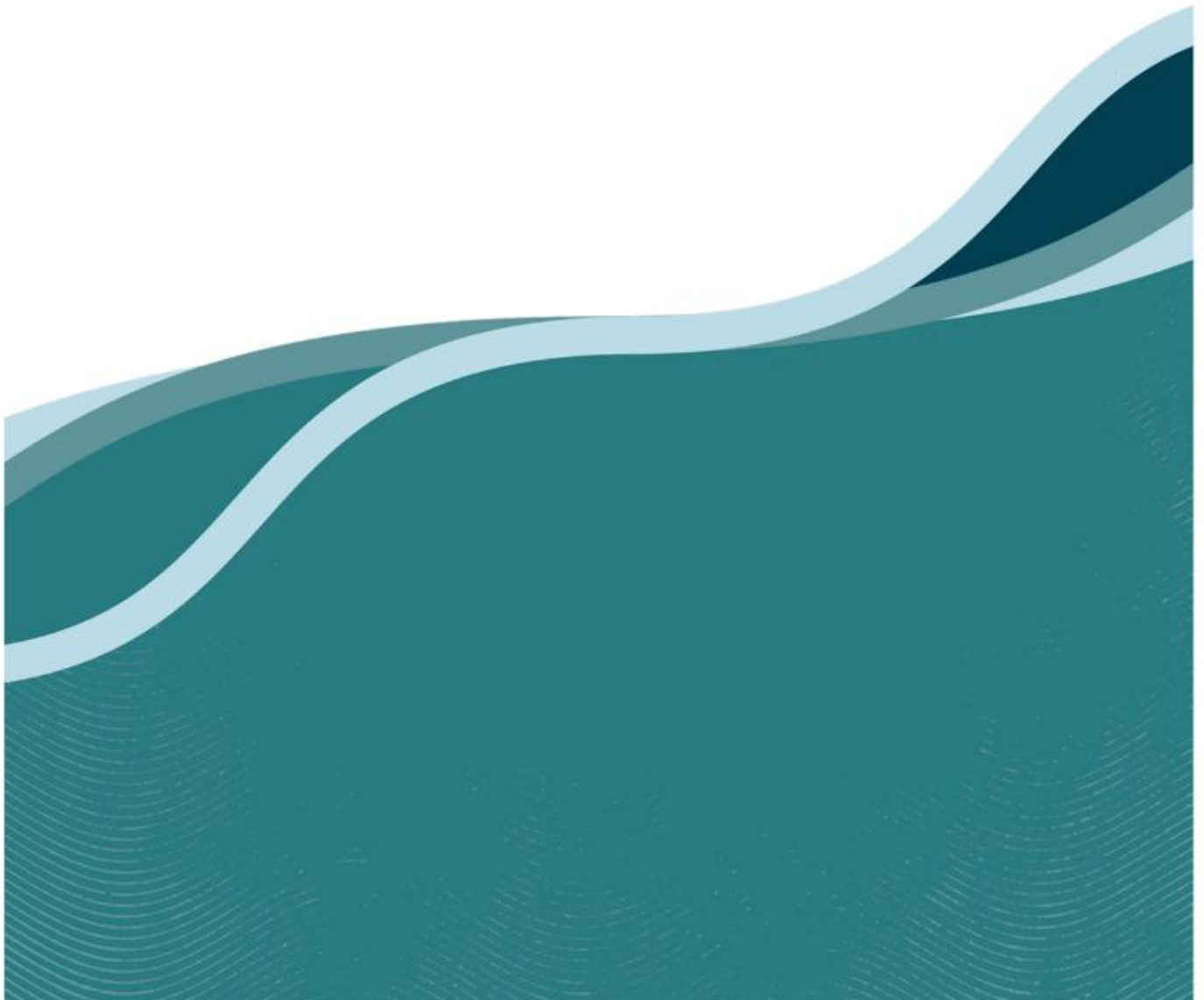
Department of
Primary Industries and
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Ministerial Statement 938 Compliance Assessment Report 2024

(Compliance reporting period 1 January 2024 to 31 December 2024)



Date	Version	Prepared by
12 March 2026	1.0	Renee Zuks and Oliver Basson
16 April 2026	2.0	Oliver Basson

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Acronyms and Abbreviations

Authorisation	Authorisation to take or disturb threatened species, <i>Typhonium</i> sp. Kununurra (Authorisation Number TFL 001-2122 dated 11 April 2021, as amended)
BC Act	<i>Biodiversity Conservation Act 2016</i>
CALIM	Common Area Lease and Infrastructure Management Agreement
CAP	Compliance Assessment Plan
CAR	Compliance Assessment Report
CEO	Chief Executive Officer
DAFWA	Former Department of Agriculture and Food Western Australia
DBCA	Department of Biodiversity, Conservation and Attractions
DPIRD	Department of Primary Industries and Regional Development
DW1GS	DW1 Gauging Station
DWER	Department of Water and Environmental Regulation
EMP	Environmental Management Program
EP Act	<i>Environmental Protection Act 1986</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cwth)
FPDP	Final Project Design Plan
Goomig	Goomig farm area, also known as the Weaber Plain farm area and Weaber Plain Development Area
GL	Gigalitres
ha	Hectare(s)
IRG	Independent Review Group established in accordance with approval EPBC 2010/5491
JTSI	Former Department of Jobs, Tourism, Science and Innovation
KAI	Kimberley Agricultural Investment Pty Ltd
KBC	Kimberley Boab Consulting Pty Ltd
km	Kilometres
MG	Miriuwung and Gajerrong (Corporation)
ML	Megalitres
MS938	Ministerial Statement 938
OIC	Ord Irrigation Cooperative
ORIA	Ord River Irrigation Area
OEPA	Former Office of the Environmental Protection Authority
Proposal	Ord River Irrigation Area Stage 2 (M2 Supply Channel) proposal
RIWI Act	<i>Rights in Water and Irrigation Act 1914</i>
SGDMP	Stormwater and Groundwater Discharge Management Plan
TsK	<i>Typhonium</i> sp. Kununurra
tpa	Tonnes per annum

1. Introduction

Ministerial Statement 938 for the Ord River Irrigation Area Stage 2 (M2 Supply Channel) proposal was published on 12 June 2013 under section 45 of the EP Act. DPIRD administers MS938 on behalf of the Minister for Regional Development.

MS938 provides for the construction of the M2 Supply Channel, the development of up to 33,500 ha of land for irrigated agriculture and associated infrastructure, and environmental buffer areas north-east of Kununurra. The 'M2 area' refers to the agricultural land able to be serviced by the M2 Supply Channel. KAI is the developer of the 'M2 area' farms on the Weaber and Knox Creek Plains in accordance with the Ord Development Agreement executed in December 2013. Keep Farming Pty Ltd is KAI's Development Partner for the Knox Creek Plain.

The M2 area is the second stage of the ORIA. There is no ability to implement that part of the Proposal identified in Schedule 1 of MS938 within the Northern Territory. Figure 1 shows the location of the development and buffer areas on the Weaber (Goomig) and Knox Creek Plains.

Development of the M2 Supply Channel, roads, and farm infrastructure on the Weaber Plain commenced in 2010. The M2 Supply Channel was completed in 2014 and farming at Goomig commenced in 2015. The Goomig farmlands are now fully developed and operational, except for Lots 4, 7, 11, and 15.

Clearing on the Knox Creek Plain commenced and subsequently ceased in 2020 due to presence of the threatened flora species *Typhonium* sp. Kununurra in the area. An authorisation to take or disturb TsK in the Knox Creek Plain development area was granted under section 40 of the BC Act to the Minister for Regional Development on 2 November 2021 (Authorisation Number TFL 001-2122, as amended) and clearing recommenced in May 2022. A total 5,460 ha of native vegetation had been cleared in the Knox development area by the conclusion of the 2023 compliance reporting period, of which 4,949 ha is mapped as suitable habitat for TsK (Figure 1). No clearing was undertaken in 2024.

This Compliance Assessment Report reports on compliance with the conditions set out in MS938 for the period 1 January 2024 to 31 December 2024.

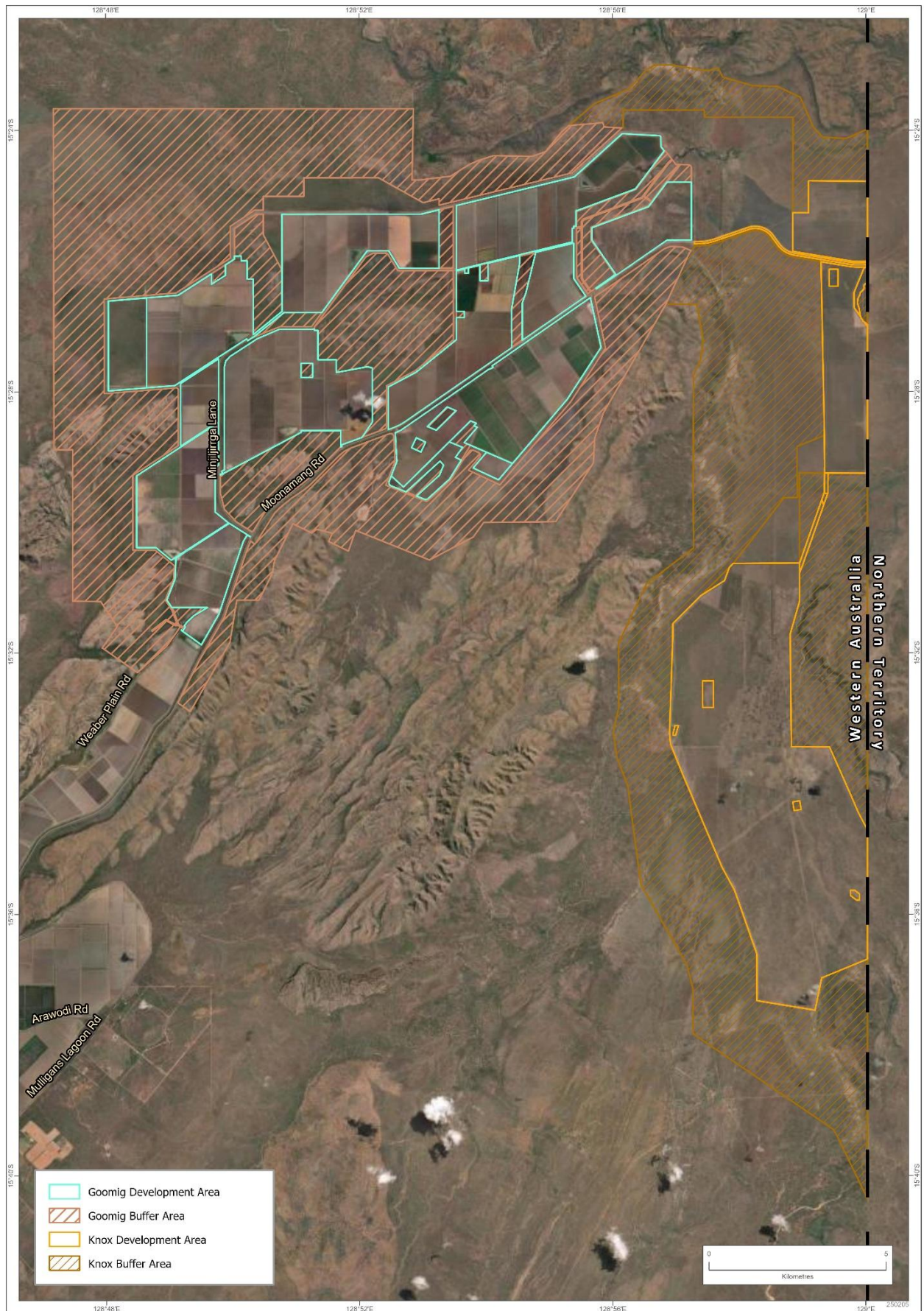


Figure 1. Goomig and Knox Creek Plain development and buffer areas

2. Project approvals

Table 1 lists the programs and plans approved in accordance with conditions 5 and 6 of MS938 by the conclusion of 2024. Table 2 lists other relevant and related approvals.

Table 1. Project details and status of WA EP Act (1986) approvals for the M2 area

Plan	Description
Final Project Design Plan – Weaber Plain (MS938 Condition 6)	Ord River Irrigation Area – Weaber Plain Development Project Phase 1 Final Project Design Plan (Strategen, 2010) Ord River Irrigation Area – Weaber Plain Development Project Phase 2 Final Project Design Plan (Strategen, 2011) Approved by letter from the OEPA dated 15 August 2011.
Environmental Management Program – Weaber Plain (MS938 Condition 5)	Ord River Irrigation Area – Weaber Plain Development Project – Environmental Management Program, October 2013 (Department of State Development and Landcorp, 2013)
Final Project Design Plan – Knox Creek Plain (MS938 Condition 6)	Knox Creek Plain Agricultural Development Final Project Design Plan Amended – July 2019 Revision C (KBC, 2019) Approved by letter from the OEPA dated 4 May 2020.
Environmental Management Program – Knox Creek Plain (MS938 Condition 5)	Ord River Irrigation Area – Knox Creek Plain Environmental Management Program, August 2015 (KBC, 2015)

An amended Knox Creek Plain FPDP (Keep Farming Pty Ltd, 2025) was approved by DWER on 6 October 2025, noting that this was outside of the current reporting period. The revised FPDP involves the following key changes from the previously approved FPDP (dated 2019):

1. A revised farm area and buffer area making these areas consistent with the Authorisation.
2. Proposed 77 ha borrow pit in the environmental buffer area including entry and exit tracks.
3. Eight proposed agricultural stormwater discharge outlets, including infrastructure in the buffer area in association with six of the outlets.
4. Proposed 10.5km station access track and associated drainage infrastructure in the buffer area.
5. Proposed new fencing within the buffer area.

Table 2. Other relevant and related environmental approvals and decisions

Area	Approval /Decision	Approval Authority	Approval Holder	Relevance
Weaber Plain (Goomig)	Approval EPBC 2010/5491 Weaber Plain Development Project	Australian Government Minister for the Environment	Department of Primary Industries and Regional Development	Applies to the Weaber Plain portion of the Proposal and duplicates some MS938 EMP provisions.
Weaber Plain (Goomig)	SWL179228(7) Surface Water License issued under RIWI Act	DWER under delegation	KAI	The Operating Strategy requires compliance with environmental approvals.
Knox Creek Plain	Approval EPBC 2014/7143 Knox Creek Plain Irrigation Development	Australian Government Minister for the Environment	KAI	Applies to the Knox Creek Plain portion of the Proposal and duplicates some MS938 EMP provisions.
Knox Creek Plain	TFL 001-2122 (as amended) Authorisation under section 40 of the BC Act	Minister for Environment	Minister for Regional Development	Applies to the Knox Creek Plain development area and Goomig Lots 4, 7 and 11.
Northern Knox Creek Plain - Moonamang Road	EPBC 2017/7856 'Not a controlled action' decision	Australian Government Minister for the Environment	JTSI	Moonamang Road realignment is part of the Proposal.
Sorby Hills	EPBC 2011/6230 'Not a controlled action' decision Sorby Hills Silver Lead Zinc Project, East Kimberley	Australian Government Minister for the Environment	Boab Metals Pty Ltd	Project area overlaps MS938 Proposal area.
Sorby Hills	EPBC 2023/09576 Open cut mining, tailings storage, evaporation pond, borrow pit and ancillary infrastructure. 'Controlled Action'. Approval issued 29 August 2025	Australian Government Minister for the Environment	Sorby Management Pty Ltd	Project area overlaps MS938 Proposal area.

Area	Approval /Decision	Approval Authority	Approval Holder	Relevance
	(outside of current reporting period).			
Sorby Hills	Ministerial implementation Statements 964 and 1097. Section 45(C) amendments (changes to proposal and conditions) approved 18 December 2024. Sorby Hills Silver Lead Zinc Project, East Kimberley	Minister for Environment	Boab Metals Pty Ltd	Project area overlaps MS938 Proposal area.

3. Current Status

3.1. Weaber Plain (Goomig)

No clearing was undertaken in the Goomig development area in 2024. The Goomig farmlands are now fully developed and operational, except for deferred Lots 4, 7, 11, and 15. Figure 2 shows a satellite image of the Goomig development area dated June 2025.

Cotton, hay and maize were grown in the Goomig farmlands in 2024. Hay was grown under sub-lease. KAI reported in its Surface Water Management Report 2024 that:

- The OIC released 26.1 GL to the Goomig farmlands in 2024 through the M2C3 structure.
- Of this, the offtake meters recorded 20.9 GL delivered to Goomig farms for irrigation during the 2024 irrigation season.
- No water was used by MG Corporation
- The Knox Creek Plain (Keep Farming) required its first water for the purposes of commissioning the Knox Supply Channel.
- Ord Stage 1 D8 tailwater discharge was discontinued during 2023 and stormwater has been rediverted via drainage lines through the Goomig farmland.
- Development of the Knox Creek Plain continued with [cotton] farming in northern Knox commencing in early 2025. Water requirements have been incorporated into Goomig water licence and associated Operating Strategy for 2025.

DPIRD continues to convene the IRG to oversee the hydrological aspects of the Weaber Plain Development Project in accordance with condition 9 of EPBC 2010/549. The IRG met once during the compliance assessment period, on 30 October 2024. The IRG's oversight supports compliance with conditions of EPBC 2010/5491 and, in doing so, supports compliance with the surface and groundwater management actions specified in the Weaber Plain EMP under condition 5 of MS938.

3.2. Knox Creek Plain

A total of 5,460 hectares of native vegetation had been cleared in the Knox Creek Plain development area to the end of 2023. This includes 52 hectares of clearing for the Knox irrigation water supply channel. No clearing of native vegetation was undertaken in 2024. Figure 3 shows the extent of clearing on Knox Creek Plain up to 31 December 2023. Figure 4 shows the satellite imagery from June 2025 which confirms the current clearing extent.

The development of the Knox Creek Plain for agriculture continued in 2024 including the further preparation of farmlands and development of infrastructure. Approximately 600 hectares of sorghum was dryland cropped on Knox Lot 352 on the Knox Creek Plain in 2024. KBC (2025, p.9) reported the following Knox farm development activities in 2024:

- Farm infrastructure (workshop and sheds) completed.
- Workers' accommodation buildings and surrounds 95% completed.
- Machinery gravel pad 80% completed.
- Clearing [tidying] of fields completed.
- M2 extension channel earthworks completed (7,500 lineal metres).

- Flood protection levee around the central Knox area completed (13,100 lineal metres).
- Farm internal main supply channel constructed (5,200 lineal metres).
- Northern farm area flood protection levee completed (3,700 lineal metres).

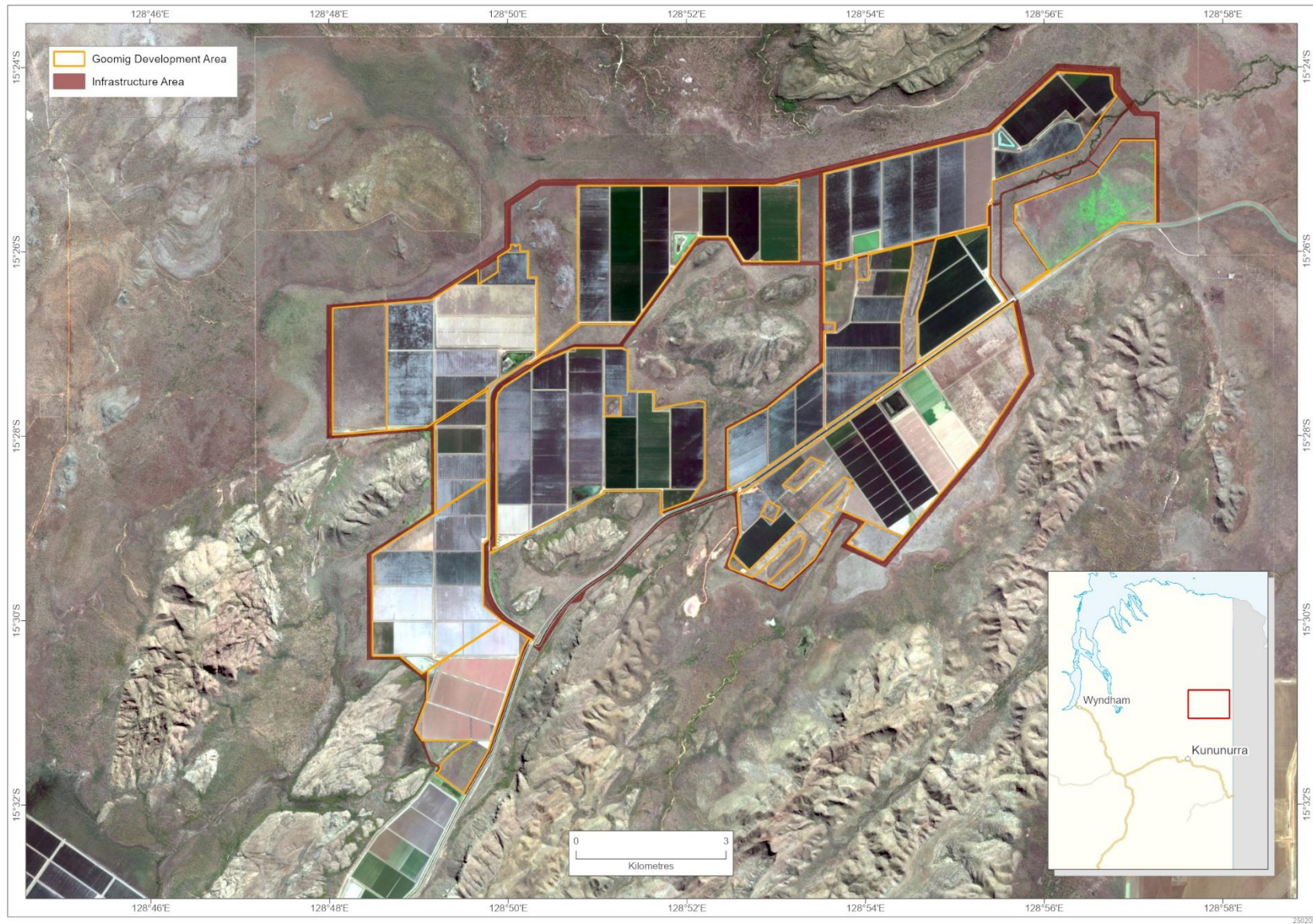


Figure 2. Satellite image of Goomig development area (July 2025)

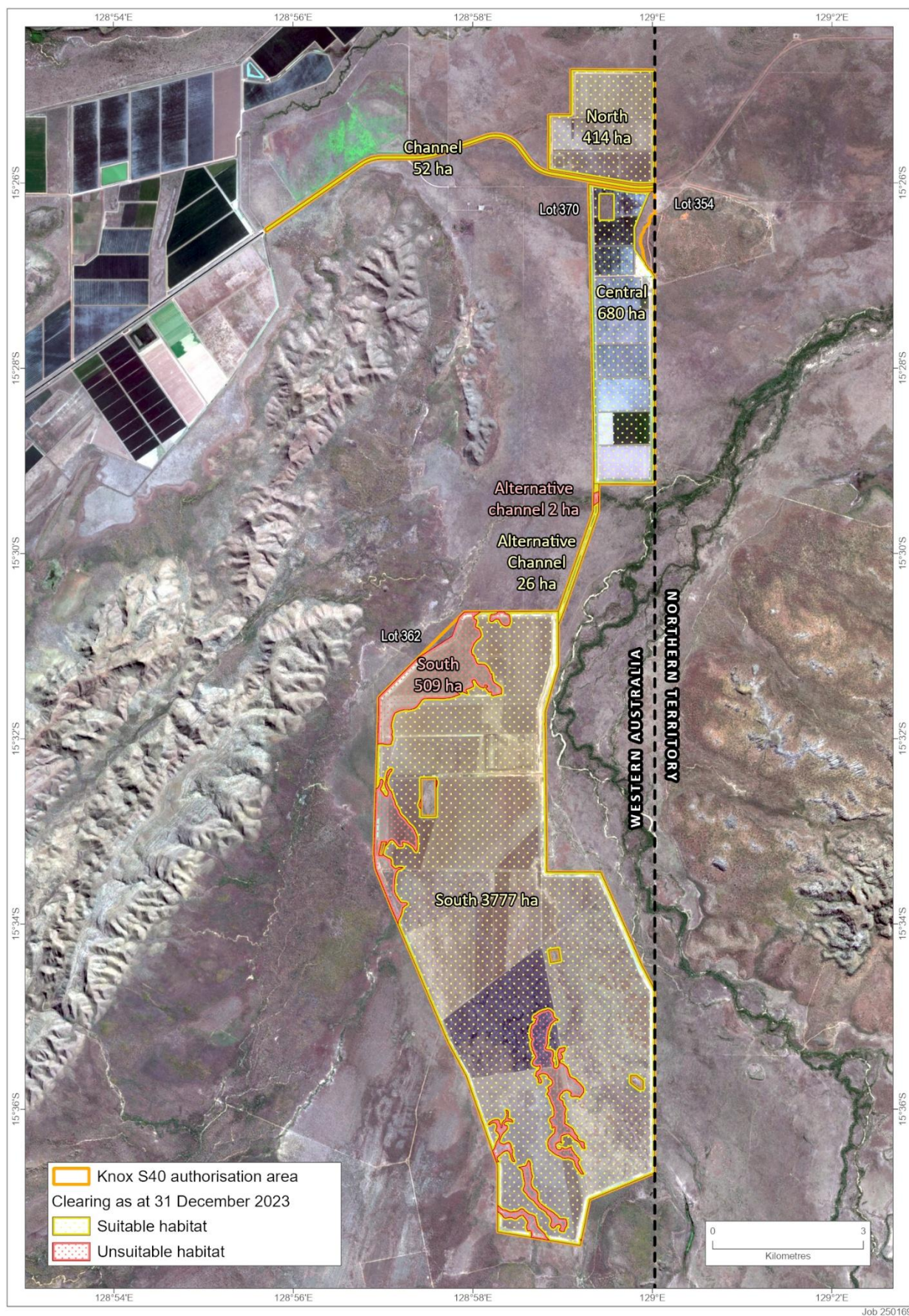
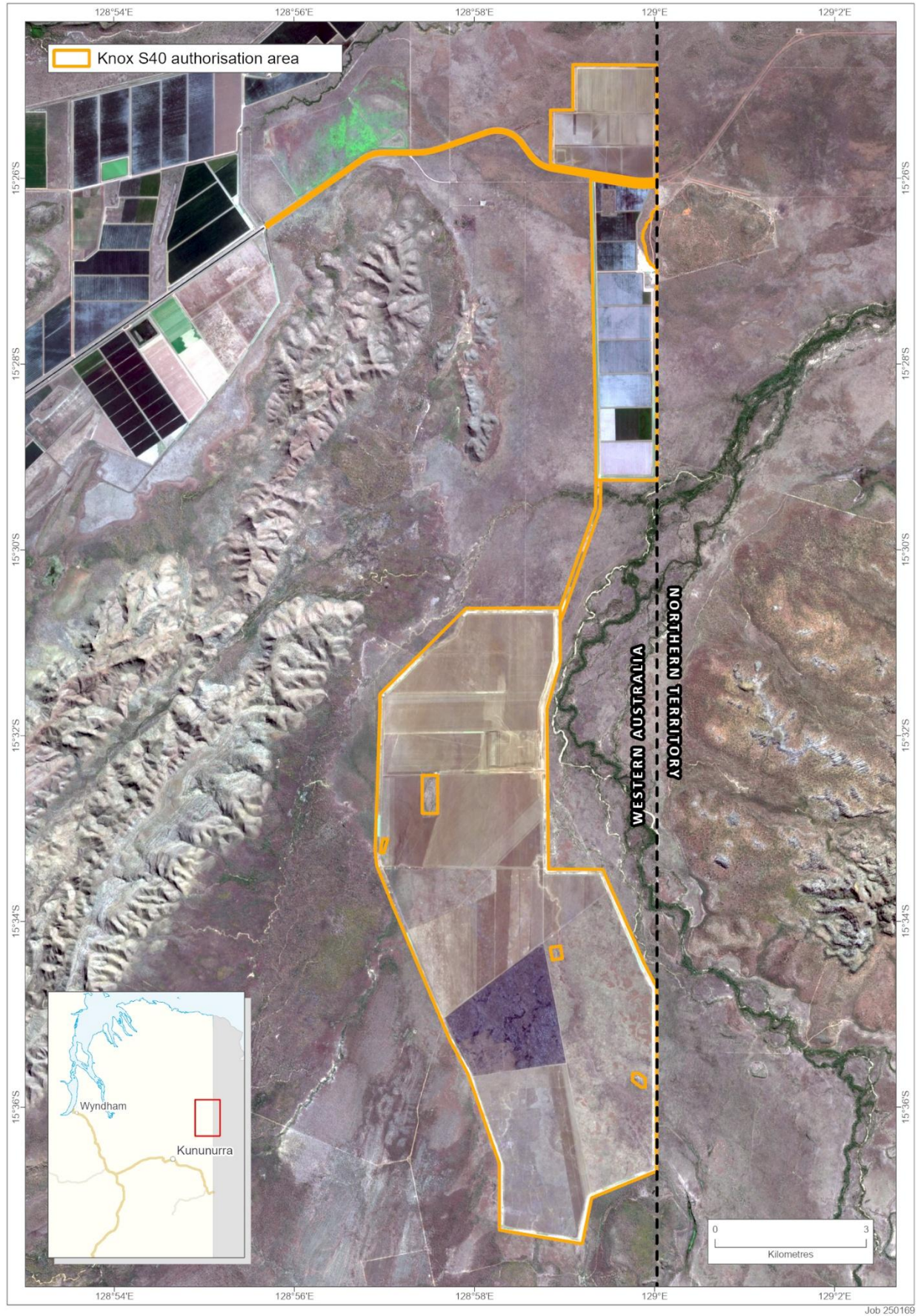


Figure 3. Knox Creek Plain clearing extent to 31 December 2023 (distinguishing suitable and unsuitable TsK habitat, satellite image July 2025)



Job 250169

Figure 4. Satellite imagery of Knox Creek Plain development area (July 2025)

4. Compliance Reporting Requirements

Table 3 lists the requirements of condition 4 (Compliance Reporting) of MS938. The required CAP was approved in 2013. The approved CAP (Strategen 2013) requires the following to be addressed in the CAR in respect to plans required to be implemented in accordance with MS938:

- An overall statement of compliance with the requirement to implement each plan.
- A declaration of compliance status for each of the key requirements and/or objectives of each program/plan including information/documentation which supports/verifies the declared compliance status.
- A review of the performance and effectiveness of each program/plan in achieving the environmental outcomes required, including assessing the results of any required monitoring.

Attachment 1 provides a Statement of Compliance and declaration for the 2024 compliance assessment period. Information and documentation verifying the declared compliance status is identified within the audit tables (Attachments 2, 3 and 4) and provided separately as evidence.

Table 3. Condition 4 (Compliance Reporting) requirements

4	Compliance Reporting
4.1	The proponent shall prepare and maintain a Compliance Assessment Plan to the satisfaction of the CEO
4.2	The Compliance Assessment Plan shall indicate:
4.2.1	The frequency of compliance reporting
4.2.2	The approach and timing of the compliance assessments
4.2.3	The retention of compliance assessments
4.2.4	Reporting of potential non-compliances and corrective actions taken
4.2.5	The table of contents of compliance reports, and
4.2.6	Public availability of compliance reports.
4.3	The proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by Condition 4-1.
4.4	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by Condition 4-1 and shall make those reports available when requested by the CEO.
4.5	The proponent shall advise the CEO of any potential non-compliance within 7 days.
4.6	The proponent shall submit a compliance assessment report annually from the date of issue of this Statement addressing the previous twelve-month period or other period as accepted by the CEO. The compliance acceptance report shall:

4	Compliance Reporting
4.6.1	Be endorsed by the proponent's Managing Director or a person delegated to sign on the Managing Director's behalf;
4.6.2	Include a statement as to whether the proponent has complied with the conditions
4.6.3	Identify all potential non-compliances and describe corrective and preventative actions taken
4.6.4	Be made publicly available in accordance with the Compliance Assessment Plan, and
4.6.5	Indicate any proposed changes to the Compliance Assessment Plan as required by Condition 4-1.

5. Audit Methodology

This CAR addresses the 12-month period from 1 January 2024 to 31 December 2024. The 2024 audit of compliance with the conditions of MS938 and the associated EMPs (condition 5) has been undertaken to meet the requirements of condition 4 of MS938. The audit was undertaken by qualified auditor, Renee Zuks with assistance provided by Senior Project Officer, Oliver Basson.

The audit table for assessing compliance with the conditions of MS938 addresses each condition by the following elements (i.e., the audit criteria):

- Audit code: Ministerial Statement reference number.
- Subject: The environmental theme/issue.
- Action: What the proponent must do.
- How: The way the requirements of an audit element should be achieved.
- Evidence: Information or data collected to verify compliance, i.e. report/letter/site inspection requirements.
- Phase: Project phase applicable to audit element.
- Timeframe: Specific timing for achieving the requirements of an audit element.
- Status: Notes about the fulfilment of compliance using compliance status terms.
- Further information: Additional comments to support findings, where required.

The audit table for assessing compliance with Schedule 1 of MS938 addresses the key proposal characteristics.

The audit table for assessing compliance with the EMPs approved under condition 5 of MS938 address each management plan provision. Most actions specified in the Knox Creek Plain EMP are the same as the Weaber Plain EMP. Additional audit items are included in the audit table where the Knox Creek Plain EMP differs. These additional items are prefixed 'KEMP'.

In line with the approved CAP, the auditor assessed compliance with each condition, the key proposal characteristics in Schedule 1 and each EMP provision.

The auditor used a range of methods including:

- site inspections
- interview with Keep Farming Pty Ltd (Knox Creek Plain)
- collection and review of monitoring data and assessment against criteria
- review of consultant reports
- communications and collection of evidence from relevant contractors, for example aerial spraying contractor
- review of satellite imagery to confirm the extent of clearing and development is within the scope of Schedule 1
- review and consideration of IRG decisions.

The audit tables include a compliance status field that states the auditor's assessment of compliance with the implementation of the conditions and EMP actions. The auditor has applied the compliance status terms set out in OEPA (2012, p.9).

Table 4. Compliance status terms

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

6. Audit findings

6.1. Compliance with conditions

The results of the audit of compliance with the conditions of MS938 conditions is provided in Attachment 2 (Audit Table A – Ministerial Statement 938 Conditions). Two non-compliance items were found by the auditor (Table 5).

Table 5. MS938 Conditions – Non-Compliances

Condition No.	Audit code	Condition	Audit Finding
4-5	938:M4.5	The proponent shall advise the CEO of any potential non-compliance within 7 days.	Non-compliant The CEO was not advised of all potential non-compliances with EMP provisions within 7 days. These potential non-compliances are listed in Table 6 of this CAR, and in Attachment 4 - Audit Table C – Statement 938 Environmental Management Program.
5-1	938:M5.1	The proponent shall implement the proposal in accordance with the “Environmental Management Programme”, dated July 2011, or subsequent revisions approved by the CEO.	Non-compliant The Proposal is assessed as non-compliant with condition 5-1 given non-compliances or potential non-compliances with 19 of 178 EMP provisions. These 19 potential non-compliances and non-compliances are listed in Table 6 of this CAR, and in Attachment 4 - Audit Table C – Statement 938 Environmental Management Program.

6.2. Compliance with Schedule 1

Condition 1 of MS938 requires implementation of the proposal as documented in Schedule 1 of the Statement. The results of the audit of compliance with the Key Proposal Characteristics in Schedule 1 is provided in Attachment 3 (Audit Table B – Schedule 1 of Statement 938). The Proposal was found to be compliant with Schedule 1.

6.3. Environmental Management Program Compliance

Condition 5 of MS938 requires the proponent to implement the Proposal in accordance with the approved EMP. The results of the audit of compliance with the approved EMPs is provided in Attachment 4 (Audit Table C – Statement 938 Environmental Management Program).

Nineteen (19) non-compliance and potential non-compliance items are reported by the auditor. These are listed in Table 6 and Audit Table C. Table 7 lists twenty (20) 2023 non-

compliance or potential non-compliance items that have been rectified in 2024 and recorded as compliant.

There is some duplication in compliance assessment between 2024 and 2023 due to site inspections for the purpose of the 2023 CAR running late and being undertaken in the first half of the 2024 compliance period. Follow up inspections were undertaken in the second half of the 2024. DPIRD understands this is not the norm but highlights the situation here to explain the anomaly. A similar situation has occurred across 2024-2025. This 2024 report refers to the outcomes of a site inspection undertaken on 16 April 2025. This situation was rectified in 2025 with formal site inspections completed within the compliance period, in June and August 2025.

6.4. Key issues and risks

The prescriptiveness, detail and lack of focus of the current EMPs obscures the key risks associated with Ord Stage 2, one of these being the risk to Keep River aquatic ecological health and threatened species from polluted agricultural stormwater run-off; and the other being rising groundwater levels and associated risk to agricultural lands.

This compliance report records a Compliant status with the discharge management and monitoring actions in the Discharge Management Sub-plan (i.e., EMP 96 to EMP 110 in this CAR). However, this assessment of compliance is on the basis that water quality monitoring is being undertaken and there was responsiveness to exceedances of the water quality trigger criteria. There is no compliance threshold or limit as such for water quality. The stated objective of the Discharge Management Sub-plan is ‘to ensure changes to the water quantity and quality regime within the Border Creek–Keep River system does not adversely affect the downstream environment, which supports EPBC listed species.’ Compliance is ultimately determined through threatened species survey and ecological health monitoring, statistical analysis and a ‘weight of evidence’ assessment. Such survey and assessments were undertaken in 2020, 2021 and 2022 before reducing in frequency to every three years with the most recent survey undertaken in September 2025.

KAI, Keep Farming and MG Corporation committed to no longer use the herbicide product, Dual Gold, containing the active ingredient, metolachlor. However, Ord Stage 1 farms (outside the regulatory regime of MS938) continue to use this product and cause exceedances of Keep River water quality trigger criteria. Bromoxynil was detected above the trigger criteria in early January 2024. In that case the source was the Ord Stage 2 Goomig farmlands. The IRG sought more information about this event at its meeting of April 2025. There is also concern about the impact of having multiple toxicants present at once, potential impacts of additives, such as surfactants and other adjuvants, and pesticide transformation products. These issues and uncertainties are discussed by Reynolds and Morgan (2023).

In 2024, DPIRD completed and reported on a detailed review and analysis of groundwater monitoring data collected since 2014 (Bell et al. 2025). Exceedance of groundwater level and soil salinity criteria identified in that review have been recorded and documented as a non-compliance in this compliance report. DWER was notified of a potential non-compliance by letter dated 13 December 2024. The lead time on a potential response is lengthy, requiring completion of investigations, preparation of a contingency plan (likely involving dewatering) and funding for implementation of such plan.

This compliance report documents a range of non-compliances with buffer management actions and related actions in other sub-plans including cattle destocking, weeds, fire and spray drift management, and the overarching target of maintaining buffer vegetation condition in Very Good or better condition. The need for and effectiveness of such actions

requires review having regard for buffer area environmental values, the surrounding landscape and management context, and the ultimate purpose of the buffer, whether it is intended as a buffer to the surrounding environment, or an offset and conservation area in its own right.

At the time of completing this report, DPIRD had awarded a contract to an environmental consultancy to review and update the MS938 conditions and associated management plans. The consultant will pursue the delivery of outcome-based conditions and management plans addressing key environmental factors only. This is consistent with contemporary guidelines and will improve regulatory efficiency and effectiveness.

7. Conclusion

The audit for the 2024 compliance assessment period found nineteen (19) non-compliances and potential non-compliances with the 178 provisions of the Weaber and Knox Creek Plain EMPs that are required to be implemented in accordance with condition 5 of MS938. Twenty (20) previous non-compliance and potential non-compliance items had been corrected and recorded as compliant in 2024.

The review and update of the approval conditions and management plans is an opportunity to elucidate the key environmental factors for Ord Stage 2 and outcomes for these factors providing for adaptive management, remedying ongoing non-compliance with prescriptive management actions, and reducing compliance assessment and reporting burden for the proponent and regulator while meeting agreed environmental outcomes.

Table 6. MS938 Environmental Management Program – Non-Compliances and Potential Non-Compliances 2024

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period	Corrective actions
EMP 20	[Monitor] Surface and subsoil ESP and pH within the project area. Target: Sodicty levels five years after commencement of irrigation do not exceed an ESP of 6 in surface soils or 15 in subsurface soils.	Compliant	Potentially non-compliant One minor exceedance was recorded in sub-surface soils at buffer sampling site 2 where sodicty was recorded at 15.3, just above the target of 15. No other exceedances were recorded. An exceedance of the sodicty target in the buffer (unirrigated) is likely to be naturally occurring and unrelated to irrigation upon the Goomig farms. However, the buffer is within the project area and therefore this item been assessed as potentially non-compliant.	Minor sodicty exceedance at one sampling site, DPIRD to investigate potential cause and monitor the 2025 results for comparison. If required, remedial action to be identified.
EMP 40 (Chemical management)	Develop emergency response procedures in accordance with Department of Water, Water Quality Protection Note <i>Contaminant spills – emergency response</i> (WQPN No.10).	Potentially non-compliant There are no emergency spill response procedures in place.	Potentially non-compliant The auditor did not see any evidence of emergency response procedures in 2024. However, in early 2025 KAI provided its induction materials which has the following sentence related to chemical spill: “These contain information on the safe handling, storage, and first aid plus emergency procedures in the event of a spill”.	DPIRD to advise KAI and Keep Farming of outstanding requirement. Formal Emergency response procedures to be provided to DPIRD by KAI, Keep Farming and MG Corporation.

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period	Corrective actions
EMP 57 (Weed, plant pathogen and pest animal management)	Implement an induction program for personnel which contains information on: • hygiene procedures • specific soil management requirements in Priority Areas • requirement to remain within designated clearing areas.	Compliant	Potentially non-compliant (Knox) This is conservatively assessed as potentially non-compliant since DPIRD had no evidence of these inductions being undertaken in the 2024 reporting period. In 2024 Keep Farming was still preparing its formal induction materials.	Keep Farming employed an environmental and safety officer in January 2025. Albeit outside of the reporting period, Senior DPIRD staff completed Keep Farming's environmental induction alongside Goomig-Knox IRG members prior to a site visit on 10 April 2025. This involved a PowerPoint presentation and information package addressing health, safety and environmental requirements including the requirement not to enter buffer areas. This potential non-compliance has therefore been rectified and will be reported as such in the 2025 compliant assessment report.
EMP 77 (Weed, plant pathogen and pest animal monitoring)	[Monitor] Presence of declared weeds in farm lots. Target: No declared weed species present.	Compliant	Potentially non-compliant In 2024 there were potentially declared weed species present on the cleared and undeveloped Goomig Lot 15 owned by MG Corporation, therefore this item is assessed as potentially non-compliant.	MG Corporation undertook weed survey and treatment activities on Lot 15 in November 2025. This will be reported in the 2025 compliance assessment report.
KEMP 83 (Groundwater management and monitoring)	Expand the groundwater monitoring bore network to include:	Potentially non-compliant KAI advised that monitoring of existing bores in the Knox and adjacent Spirit Hills (Northern Territory) areas commenced after receipt of	Potentially non-compliant Groundwater bores on the Knox Creek Plain have been monitored over the course of years including	Knox groundwater monitoring network to be confirmed in consultation with the IRG. Keep Farming has arranged meetings with DPIRD for April and June 2026

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period	Corrective actions
	• 'high intensity' regional bores (i.e. auto loggers installed) • 'low intensity' regional bores (i.e. no auto loggers installed but monitored manually).	the EPBC Act approval for the Knox development (EPBC 2014/7143) in 2015. KAI physically located these bores after receiving location details from DPIRD (DAFWA at the time). These bores are additional to the Goomig (EPBC 2010/5491) reference bores located in the Knox area. KAI is reviewing this existing bore network and data to determine its adequacy for groundwater monitoring and management. Until then, this item is assessed as potentially non-compliant.	in the capacity of some of these bores as Goomig reference bores. The Knox groundwater monitoring network requires confirmation in consultation with the Goomig-Knox IRG. Until then, this item is assessed as potentially non-compliant.	to confirm the required bore monitoring network for Knox.
EMP 91 (Groundwater management and monitoring)	Update groundwater model and operation of groundwater management system with monitoring data derived from monitoring data derived from Item 2, 7 and 8 in consultation with the IRG. Prior to commencement of irrigation and subsequently every 2 to 4 years depending on monitoring trends.	Potentially non-compliant The groundwater model has not been updated since the commencement of irrigation, which is inconsistent with the requirement that modelling must be updated every 2 to 4-years. The Goomig project is assessed as potentially non-compliant with EMP 91 given the specified timeframe which has not been formally amended following the IRG's	Non-compliant The groundwater model has not been updated since the commencement of irrigation, which is inconsistent with the requirement that the groundwater model be updated every 2 to 4 years depending on monitoring trends.	DPIRD awarded a contract to a hydrogeological consultant on 20 November 2025 to undertake the Weaber Plain-Goomig groundwater modelling project. Progress will be reported in the 2025 compliance assessment report. DPIRD completed a detailed groundwater data review in 2024 (Bell et al, 2025), which will inform the Goomig groundwater modelling project.

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period	Corrective actions
		endorsement of Bennett et al (2019)'s recommendations.		
EMP 94 (Groundwater contingency actions)	Groundwater levels, soil salinity and quality exceed or are likely to exceed trigger levels	Potentially non-compliant An assessment of 2023 groundwater level and quality data has not been completed therefore this item is assessed as potentially non-compliant.	Non-compliant DPIRD completed a detailed review of groundwater data in 2024 (Bell et al. 2025). This review found that water level triggers have been exceeded at some monitoring sites, in conjunction with exceedance of soil salinity criteria from samples collected from adjacent farm lots; and that water salinity triggers have been exceeded at three sites. DWER was notified of a potential non-compliance with the Groundwater Management Sub-Plan by letter dated 13 December 2024 attaching a copy of the draft Goomig groundwater review report. It was noted in the same letter that the M2 irrigation water supply channel may be leaking more than the EMP commitment to limit seepage rates to less than 2 mm/day.	Refer to Appendix I of Bell et al. 2025 which contains a summary of trigger levels for monitoring bores. Refer to Bell et al. 2025 for evidence that the causes have been investigated. DPIRD commenced M2 channel leakage investigations in collaboration with the Water Corporation in 2025. DPIRD awarded a contract to a hydrogeological consultant in November 2025 to undertake the Weaber Plain-Goomig groundwater modelling project which will review the causes for the onset of shallow water tables and the need for, and impact of, dewatering. The targeted groundwater model currently being prepared by Nullspace Technologies (conceptual model to be delivered May 2026) will inform updated corrective actions relating to groundwater levels.
EMP 125 (Buffer management actions)	Stabilise and revegetate areas identified as containing vegetation below a rating of 'Very	Completed Previously reported as Completed, in error.	Potentially non-compliant This item has been assessed as potentially non-compliant since	Strategen (2015) recommended revision of the revegetation requirements of the EMP in consultation with the OEPA and

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period	Corrective actions
	Good' in accordance with species lists and planting procedures determined in consultation with DPW AND/OR DER.		DPIRD has no explicit evidence of stabilising/revegetating areas of vegetation below a rating of Very Good being undertaken. The timing applicable to this action is for rehabilitation to occur within 12 months of the completion of construction. Landcorp oversaw this through the Leighton contract in 2013-2014. Any rehabilitation undertaken is understood to be documented in older Landcorp records, which DPIRD does not possess. Inspections of buffer condition support that stabilising and revegetating large parts of the buffer are not required. Furthermore, on the advice of Department of Water and Environmental Regulation (DWER), DPIRD has determined that the vegetation condition rating scale is not appropriate for assessing vegetation condition within the Goomig buffer.	deletion of this action if agreed that revegetation is unnecessary due to natural regeneration and other management actions being undertaken. Implement Strategen's (2015) recommendation. DPIRD's work to revise the environmental management plans will address this historic non-compliance and determine which vegetation condition arrangement/scale is suitable for the buffer.
EMP 126 (Buffer management actions)	In consultation with the DPW and/or DER and DoW, revegetate areas within the buffer with species selected specifically for their ability to lower the groundwater	Completed Reported as Completed (in error)	Potentially non-compliant There is no explicit evidence that this action was completed. The timing applicable to this action is for rehabilitation to occur within 12 months of the completion of construction. Rehabilitation of	Strategen (2015) had recommended revision or deletion of this action in consultation with the OEPA and other relevant agencies.

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period	Corrective actions
	table, given the local soil, water and solute settings. Species used in such revegetation will be agreed with the DPW and/or DER and DoW.		disturbed portions of the buffer was undertaken at that time by contractors for LandCorp (Leightons). Rehabilitation involved re-spread of topsoil from the actual locations, with local/endemic seed contained. Monitoring included years of photographic records, and more recent site visits by consultant botanists to assess progress. Natural revegetation has occurred with local species that grow in the respective soil types found in the Goomig buffer.	Implement Strategen's (2015) recommendation. DPIRD's work to revise the environmental management plans will address this historic non-compliance and determine which vegetation condition arrangement is suitable for the buffer.
EMP 132 (Buffer management actions)	Implement the Fire Management Sub-plan.	Potentially non-compliant The Goomig project is non-compliant with the strategies listed in the Fire Management Plan (Strategen 2012). The Fire Management Plan is being implemented in part as follows: • Fire breaks are being maintained and inspected, • Four-wheel drive access around the perimeter of the buffer is available where fencing is installed,	Non-compliant (Goomig) The Fire Management Sub-plan comprising section 5.0 of the Weaber Plain EMP is not being implemented. A fire management plan was drafted to satisfy EPBC 2010/5491 and MS938, however, the plan has not been formally approved. Potentially non-compliant (Knox) Firebreaks were unable to be constructed in the Knox buffer until the FPDP was approved (October 2025), at which point the wet	The Fire Management Plan is prescriptive, out of date, and requires review, including review of the environmental outcome(s) being sought from implementation of buffer area fire management. DPIRD's work to revise the environmental management plans will address this. A fire management guide was prepared in 2025 for Knox.

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period	Corrective actions
		- The western part of the Goomig Project environmental buffer area is subject to controlled burns implemented by DBCA in the adjacent Goomig Conservation Park which forms part of a landscape contiguous with the buffer, - The fire scar, including extent and timing of fires, is monitored through the North Australia & Rangelands Fire Information service.	season prevented this occurring. A fire management guide was prepared in 2025.	
KEMP 132 (Buffer management actions)	Prepare Knox Creek Plain fire management plan in compliance with Shire of Wyndham East Kimberley (SWEK) and Department of Fire and Emergency Services (DFES) requirements.	Potentially non-compliant The auditor understands that a Knox Creek Plain fire management plan has not been prepared.	Non-compliant A Knox Creek Plain fire management plan had not been prepared by the conclusion of the 2024 compliance reporting period.	Keep Farming (2025) stated that 'a fire management plan to meet WA Department of Fire and Emergency Services (DFES) and Shire of Wyndham East Kimberley (SWEK) requirements is in preparation, and will be updated regularly as required under the <i>Knox Creek Plain EMP</i> .' A fire management guide was prepared in 2025 for Knox and has been provided to DPIRD, with this item to be assessed as compliant in 2025.

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period	Corrective actions
EMP 133 (Buffer monitoring regime)	Assess vegetation condition using the Keighery (1994) rating scale and update vegetation condition map. Target: All areas within buffer to be in 'Very Good' or better condition.	Non-compliant DPIRD undertook vegetation/habitat condition assessment at some sites in the north-west of the Goomig buffer and parts of the Knox buffer as part of surveys of a proposed offset conservation area for TsK under the Authorisation. The assessment did not cover the whole buffer and the vegetation condition map has not been updated, therefore this item was assessed as non-compliant.	Non-compliant DPIRD undertook buffer vegetation condition assessment in June 2024. DPIRD hasn't been assessing vegetation against the Keighery scale since 2021 because of the advice of DWER as the state environmental regulator. Vegetation at most monitoring sites was found to be below the target of Very Good condition.	Continue implementing destocking and weed management actions in accordance with the EMPs, and provide additional evidence of weed control. Cause(s) of increased cattle activity in the buffer area compared to previous years to be investigated, and corrective actions continue to be taken to address the causes. DPIRD to address the appropriate vegetation condition scale as part of its work to revise the approved environmental management plans.
EMP 135 (Rehabilitation management actions)	Survey reference sites identified in Item 1 [EMP 134] to determine indicator species, density of native species, % cover of native species, native species richness and % weed cover as outlined in the monitoring procedures.	Potentially non-compliant Rehabilitation activities have been undertaken however the success of these activities has not been formally assessed. Consequently, this item and the related items EMP 136, 138, 139, 162, 163 and 164 have been assessed as potentially non-compliant.	Non-compliant Survey of reference sites had not been undertaken by the conclusion of the 2024 compliance reporting period therefore this item is assessed as non-compliant.	DPIRD engaged environmental consultant, Western Environmental, in 2025 to undertake survey of rehabilitation sites and reference sites and report on the success of rehabilitation through reference to completion criteria, including criteria for indicator species. The assessment report was delivered to DPIRD in October 2025. This will be addressed in the 2025 compliance assessment report. Gelganyem was contracted in 2025 to implement corrective actions.
EMP 136 (Rehabilitation)	Determine parameters and targets for each		Non-compliant	

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period	Corrective actions
management actions)	indicator species as appropriate. e.g. density of indicator species, % cover of indicator species, etc.		This action of determining parameters and targets for indicator species had not been undertaken by the conclusion of the 2024 compliance reporting period therefore this item is assessed as non-compliant.	
EMP 138 (Rehabilitation management actions)	Develop a species list for seed collection based on species known to germinate from seed and/or that can be propagated by nurseries.		Non-compliant Reports by Phoenix Environmental (2024) and Western Environmental (2025) include species lists for rehabilitation and reference sites. A species list specifically for seed collection purposes had not been developed by the conclusion of 2024 therefore this item is assessed as non-compliant.	Western Environmental (2025) provided recommendations for remedial work including recommended spot planting of native upper canopy species at one the of the rehabilitation sites. Gelganyem was contracted in 2025 to implement corrective actions. This will be addressed in the 2025 compliance assessment report.
EMP 139 (Rehabilitation management actions)	Contract experienced seed collector licensed by the DPW AND/OR DER to undertake a seed collection program of plant species endemic to the project area following <i>Florabank Guidelines</i> (Greening Australia 2009).		Non-compliant Seed collectors had not been contracted in 2024 therefore this item is assessed as non-compliant.	The need for this action requires review having regard for the rehabilitation site assessment results and recommendations made by Western Environmental 2025.
EMP 162 (Rehabilitation monitoring regime)	[Monitor] native species richness, density and % cover within rehabilitation sites as outlined in the monitoring procedures.		Non-compliant The rehabilitation monitoring regime had not been undertaken at Goomig rehabilitation sites	DPIRD engaged environmental consultant, Western Environmental, in 2025 to undertake survey of rehabilitation sites and reference sites and report on the success of

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period	Corrective actions
EMP 163 (Rehabilitation monitoring regime)	[Monitor] indicator species in rehabilitation sites.		Non-compliant The rehabilitation monitoring regime has not been undertaken at Goomig rehabilitation sites.	rehabilitation through assessment against completion criteria. The assessment report was delivered to DPIRD in October 2025. Compliance with the requirements of the rehabilitation monitoring regime will be addressed in the 2025 compliance assessment report with reference to the results reported by Western Environmental and corrective actions. The ongoing requirement for biannual monitoring requires review having regard to the results of the Western Environmental (2025) assessment and associated recommendations.
EMP 164 (Rehabilitation monitoring regime)	[Monitor] exotic species richness and % cover within rehabilitation sites as outlined in the monitoring procedures.		Non-compliant The rehabilitation monitoring regime has not been undertaken at Goomig rehabilitation sites.	

Table 7. MS938 Environmental Management Program – Rectified Non-Compliances 2024

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period
EMP 21 (Chemical management)	Prospective land managers will be advised of the requirement to comply with procedures for chemical application, and chemical management legislation	Potentially non-compliant Inspection of the Knox Development operations centre area on 8 April 2024 found improper storage of hydrocarbons and other chemicals. The above indicates that Keep Farming has not been satisfactorily advised of the requirements.	Compliant The Developer (KAI) and the Knox Development Partner (Keep Farming) have been advised and are aware of the requirement to comply with the Knox EMP. The requirement to comply with the environmental approvals, including the approved EMPs, are documented in various agreements.
EMP 22 (Chemical management)	Induct personnel on safe use of chemicals and hydrocarbon management measures, including hydrocarbon handling, disposal, and spill response procedures.	Potentially non-compliant Inspection of the Goomig operations area on Lot 3 on 22 April 2024 found improper storage of chemicals and improper washdown facilities. Inspection of the Knox Development operations centre area on 8 April 2024 found improper storage of hydrocarbons and other chemicals. The above indicates that personnel have not been satisfactorily inducted.	Compliant Follow up inspection of the Goomig operations area on Lot 3 on 28 June 2024 found that chemicals had been removed from site and the washdown facilities had also been removed. Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant. Personnel inductions to continue to be undertaken by KAI and Keep Farming. Keep Farming employed an environmental and safety officer in January 2025 and commenced formal environmental and safety inductions for personnel.
EMP 23 (Chemical management)	Ensure storage of farm chemicals complies with relevant Australian and Western Australian Standards	Non-compliant Inspection of the Weaber Plain (Goomig) operations area on Lot 3 on 22 April 2024 found improper storage of chemicals. Inspection of the Knox Development operations centre area on 8 April 2024 found improper storage of hydrocarbons and other chemicals.	Compliant Follow up inspection of the Goomig operations area on Lot 3 on 28 June 2024 found that chemicals had been removed from site and the washdown facilities had also been removed. Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant. Follow up inspection of the Knox Development operations centre on 28 August 2024 found that the non-compliances had been rectified. Given the

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period
			corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant.
EMP 24 (Chemical management)	All hydrocarbons will be stored in accordance with the following: <i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i> (WA) - Australian Standard AS 1940-2004: The Storage and Handling of Flammable and Combustible Liquids.	Non-compliant Due to improper storage of hydrocarbons recorded during inspection of the Knox operations centre area on 8 April 2024.	Compliant Follow up inspection of the Knox operations centre on 28 August 2024 found that the non-compliances had been rectified. Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant.
EMP 26 (Chemical management)	Maintain appropriate spill response equipment and Material Safety Data Sheet (MSDS) information in all hydrocarbon storage and re-fuelling areas and maintenance areas.	Potentially non-compliant No spill response equipment or MSDSs were observed at Goomig during site inspection on 22 April 2024. No spill response equipment or MSDSs were observed in the diesel storage and refuelling area during site inspection of the Knox operations centre on 8 April 2024.	Compliant Follow up inspection of the Goomig operations centre on 28 June 2024 found spill response equipment was on site. KAI advised that MSDSs were available to staff in digital format. Follow up inspection of the Knox operations centre on 28 August 2024 found spill response equipment in place.
EMP 29 (Chemical management)	Notify DWER of hydrocarbon spills in accordance with the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> .	Potentially non-compliant Due to small hydrocarbon spills observed during Knox site inspection on 8 April 2024. Site inspection outcomes were reported to DWER on 15 April 2024.	Compliant Follow up inspection on 28 August 2024 found that the non-compliances had been rectified. DPIRD notes that the previous minor spills observed were not 'discharges to the environment' in accordance with the <i>Environment Protection (Unauthorised Discharges) Regulations 2004</i>. Given the corrective

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period
			actions and reinstatement of compliance in 2024, this item is recorded as compliant.
EMP 38 (Chemical management)	Design chemical washdown facilities in accordance with Department of Water, Water Quality Protection Notes on: - Mechanical Equipment Washdown (WQPN No. 68) - Chemical Blending (WQPN No. 7).	Potentially non-compliant A washdown area was observed on Goomig Lot 3 during site inspection on 22 April 2024. The washdown area did not appear to be designed in accordance with the relevant guidance note. Mechanical workshop and (potentially) washdown activities are being undertaken within a concrete-floored shed on site at Knox. A full design assessment of these facilities was not completed.	Compliant Follow up inspection on 28 June 2024 found that chemicals had been removed from site and the washdown facilities had also been removed. Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant. DPIRD has provided Keep Farming with Water quality protection note 68 – Mechanical equipment washdown. Keep Farming advised at inspection on 16 April 2025 that there is no vehicle washdown facility on site. Vehicles are presently (dry) blown out and manually wiped clean. There are plans to build a washdown facility.
EMP 39 (Chemical management)	All chemical blending and decanting will be undertaken within a fully contained area.	Potentially non-compliant Site inspection on 22 April 2024 found that some chemical decanting may occur on Lot 3. This is not a fully contained area.	Compliant A follow up inspection of Goomig Lot 3 on 28 June 2024 found agricultural chemicals had been removed from site. KAI and the auditor will continue to monitor whether chemicals will again be stored on Lot 3 without containment. To ensure compliance is maintained, all chemical blending and decanting will be undertaken within a fully contained area, which DPIRD understand isn't yet constructed on Lot 3. Chemical containment facility to be constructed on Lot 3 to provide for chemical blending and decanting, otherwise chemical

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period
			blending and decanting on Lot 3 is to be prohibited. DPIRD to advise KAI accordingly.
EMP 42 (Chemical use monitoring)	Inspection of permanent hydrocarbon storage facilities Frequency: Three monthly Target: All hydrocarbon storage devices comply with appropriate standards and/or regulations	Non-compliant These inspections have not been occurring. Inspection of the Knox operations centre on 8 April 2024 found hydrocarbons storage is non-compliant with relevant standards.	Compliant Keep Farming provided evidence of regular inspections being undertaken. Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant.
EMP 43 (Chemical use monitoring)	Survey vegetation in the Buffer Area for symptoms of damage typical of chemicals being used in the ORIA Frequency: Annually Target: No detectable impact on the buffer	Non-compliant Buffer condition assessment was not undertaken in 2023.	Compliant A buffer vegetation condition assessment was undertaken in the Goomig and Knox buffer areas in June 2024. No damage from chemicals was recorded at the monitoring sites. However, there is evidence of some minor spray drift impacts, with symptoms of potential chemical damage observed at a small edge of the Goomig buffer adjacent to sprayed fields. The target of 'no detectable impact on the buffer' was not met in some locations, as identified by Western Environmental in June 2025. Albeit outside of the 2024 reporting period, the impact was likely in 2024 or earlier. Aerial spraying is undertaken in the Goomig and Knox farmlands. Under the <i>Biosecurity and Agriculture Management (Aerial Application) Regulations 2018</i> , operators are required to record, among other things, the date and time of application of controlled chemical products, estimated wind velocity and direction at the time of application. Accordingly, aerial spraying is regulated by separate legislation.

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period
			DPIRD to request KAI and MG Corporation to review spray records and advise cause of the target not being met such as possible chemical application when wind velocity is too high. It must also be considered whether the target is achievable and reasonable in the context of aerial spraying methodology and the purpose of the buffer, which is to absorb some of the impacts of the agriculture and act as a buffer to the adjoining conservation parks. In this regard the buffer is fulfilling its purpose. DPIRD notes that the target of no detectable impact is not a threshold, and appropriate corrective actions will be undertaken for the identified spray drift in accordance with the purpose of the buffer.
EMP 44 (Chemical use monitoring)	Inspect storage facilities and mixing and washdown areas and surrounds for chemical spills. Frequency: Monthly Target: No chemical spills	Potentially non-compliant There was evidence of minor diesel and lubricant spills found during site inspection on 8 April 2024.	Compliant Follow up inspection on 28 August 2024 found that the non-compliances, including small chemical spills, had been rectified. Keep Farming also provided evidence of regular inspections being undertaken. Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant.
EMP 71 (Weed, plant pathogen and pest animal management)	Ensure that waste that may attract pest animals is properly disposed of in as far as is practicable.	Non-compliant There is a landfill at the Knox operations centre observed during site inspection on 8 April 2024.	Compliant The non-compliance was reported to DWER on 15 April 2024. Follow up inspection on 28 August 2024 found that the waste had been removed. Results of soil samples collected from the site were provided to DWER.

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period
			This item is recorded as compliant given compliance was reinstated in 2024.
EMP 72 (Weed, plant pathogen and pest animal management)	Undertake pest eradication program within Buffer Area.	Potentially non-compliant Due to the significant number of cattle observed in the buffer in August 2023.	Compliant Biota (2025) found that cattle activity in Gouldian Finch grass survey plots had increased to more than 50%. Evidence of pigs were observed in the north-west area of the Goomig buffer. Although a formal pest eradication program with the purpose to reduce the risk of pest animals becoming established within the Buffer Area was not in place during the 2024 reporting period, this item is assessed as compliant given suitable corrective actions were implemented. These include investigating the causes, mustering and de-stocking. KAI provided evidence of mustering (destocking) activities being undertaken in the Goomig buffer area in 2024. DPIRD considers that the sustained mustering effort over the past 15 years, has continued and is effective, with annual mustering undertaken in conjunction with the managers of Carlton Hill Station. The de-stocking 'program' is long term and sustained and considered highly effective based on both frequency and thoroughness. Cause(s) of increased cattle activity in the buffer area compared to previous years to be investigated, and corrective actions continue to be taken to address the causes. The reasonableness of requiring the implementation of a feral pig eradication program in the Goomig buffer is questionable. Effectiveness and value are unlikely outside a landscape-wide eradication

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period
			program that also involves Goomig and Knox neighbours and beyond.
EMP 78 (Weed, plant pathogen and pest animal monitoring)	[Monitor] Feral animals (including stock) in the buffer area. Target: No new pest animals or sightings of feral animals	Potentially non-compliant Due to the significant number of cattle observed in the buffer in August 2023.	Compliant DPIRD notes that the action's target is not a threshold, therefore, this is assessed as compliant due to one opportunistic sighting of pig diggings (no pigs themselves). There was no other evidence of pest animals in the buffer area. Stock was monitored, mustered and de-stocked in accordance with the relevant corrective actions. Cause(s) of increased cattle activity in the buffer area compared to previous years to be investigated, and corrective actions continue to be taken to address the causes.
EMP 84 (Groundwater management and monitoring)	Undertake monitoring of required parameters in the expanded groundwater monitoring bore network.	Potentially non-compliant Five bores were out of operation because of previous damage. Groundwater level data loggers were missing at six high intensity bores. Reference bore KC3PB has a pump installed and is supplying water to the Knox operations centre, Some parameters, including major cations and anions, were not included in the analytical suite.	Compliant The five bores previously of operation (11CS10RD, 11CS10RS, 11WP51S, 11WP4R, and 11WP53S) were reinstalled in May 2024. Given the water quality analytical gaps in the September 2023 groundwater monitoring program, DPIRD repeated the program in May 2024 ensuring all required data was collected.
EMP 95 (Groundwater contingency actions)	Levels of chemicals and nutrients exceed scenarios that show: an increasing trend in the concentration of any	Potentially non-compliant Refer to EMP 94	Compliant Bell et al (2025) found interim water quality (salinity) triggers have been exceeded at high intensity response bores 11WP15R, WP13, and WP5. The rising salinity levels are at depth and there are no exposure pathways for the salinity to represent a risk

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period
	chemical (at statistical confidence levels) • an exceedance of the site-specific triggers for a particular chemical over two consecutive years.		to agriculture or the environment, including MNES (Bell et al., p.33). Most bores show no rising or falling trend in total nitrogen (TN) or total phosphorus (TP). Bell et al. (2025, p.36) discuss the possible causes of rising total nitrogen in six bores (including one reference bore, CG2) and total phosphorus in two bores. Natural forms of contamination were suggested as a cause for rising TN in four bores noting organic N as the dominant N species (11WP11RS, 11WP50, 11WP54D and 11WP9RPB). The nitrogen speciation for bore 11WP11RS was in the form of ammonia and it was noted that the bore headworks were broken, so contamination was suggested as a cause. The two bores with rising trends in TP (11WP50 and 11WP54S, either had rising TN (11WP50) or high TN (11WP54S) in the form of organic N. If the form of contamination was natural, such as dead organisms in the well, this would also explain the elevated TP (Bell et al. p.36). Herbicides were detected in some bores. There are no trigger criteria for pesticides in groundwater bores. The groundwater discharge environment is at the Keep River K4 pool. The surface water quality monitoring program has recorded metolachlor (herbicide) exceedances in the Keep River over consecutive years. However, there have been no exceedances in the K4 pool and the metolachlor exceedances downstream are the result of agricultural stormwater run-off rather than groundwater discharge via baseflow at the K4 pool.

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period
EMP 101 (Discharge management actions)	Install a water quality and flow gauging station capable of sampling, on a flow proportional basis (at least sub-daily when required) at the stormwater outlet from the Development Area.	Potentially non-compliant A water quality and flow gauging station was installed during the construction phase. The flow gauging station was not functioning and transmitting data during the compliance period.	Compliant A water quality and flow gauging station was installed at the Goomig stormwater outlet during the construction phase. The flow gauging station was not functioning for a period of years until May 2024 when flow monitoring and data transmission recommenced. The 2024-2025 wet season flow data is provided as evidence of flow monitoring at the stormwater outlet from the Development Area. One Knox stormwater outlet had been installed by the conclusion of 2024 (the 'Field 19 Outlet'). The outlet did not have flow gauging capability by the conclusion of the 2024 compliance period, however, irrigation had not yet commenced on the Knox Creek Plain.
EMP 104 (Discharge management actions)	Monitor water flow at the stormwater outlet from the Development Area, Border Creek and the Keep River, determined in consultation with IRG, DPIRD, DWER and DBCA.	Non-compliant The flow gauging station at the stormwater outlet was not functioning and transmitting data during the compliance period. Flow gauging stations are operational on the Border Creek and Keep River during the compliance period.	Compliant Flow gauging function at the Goomig stormwater outlet was reinstated in May 2024.
EMP 109 (Discharge monitoring regime)	Telemetered flow monitoring at development gauge, existing gauging stations along Border Creek and the Keep River and in groundwater discharge pipe.	Non-compliant The flow gauging station at the stormwater outlet was not functioning and transmitting data during the compliance period. Flow gauging stations were operational on the Border Creek and Keep River during the compliance period.	Compliant Flow gauging function at the Goomig stormwater outlet was reinstated in May 2024.

Item	Action	Audit finding for 2023 compliance period	Audit finding for 2024 compliance period
EMP 131 (Buffer management actions)	Maintain the Buffer Area perimeter fencing, where required, to minimise stock invasion, remove introduced livestock, and continue to remove any subsequent invading livestock, as required, to protect native vegetation condition.	Potentially non-compliant Due to required fence maintenance in some locations.	Compliant DPIRD inspected buffer perimeter fencing and firebreaks in August 2024. Buffer fencing was found to be in good condition. Although cattle were observed in the Goomig buffer area in June 2024 (see EMP72), cattle were destocked from the buffer, the gate that was found to be left open was closed, and the matter was raised with the pastoral station sub-lessee. Ingress of cattle into the buffer generally occurs only during the wet season where fencing across creek lines is destroyed by water flow. Mustering programs are devised around seasonal influences. Cause(s) of increased cattle activity in the buffer should continue to be investigated, including maintenance of permitter fencing, and corrective actions taken to address the causes.

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Strategen (2013a), *Ord River Irrigation Area Stage 2 (M2 Supply Channel), Compliance Assessment Plan – Statement 938*, Revision 2, Strategen Environmental Consultants Pty Ltd., Perth, September 2013.

Strategen (2013b), *Ord River Irrigation Area Stage 2 (M2 Supply Channel), Compliance Assessment Report – Statement 938 [2012]*, report prepared for LandCorp.

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Strategen (2015), *Ord River Irrigation Area Stage 2 (M2 Supply Channel), Compliance Assessment Report – Statement 938 [2014]*, report prepared for LandCorp.

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<https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/aquatic-life-benchmarks-and-ecological-risk>.

Western Environmental Approvals Pty Ltd (2025), *Goomig Buffer Area Rehabilitation Site Assessment – Flora Monitoring*, Prepared for Department of Primary Industries and Regional Development by Western Environmental, September 2025.

Attachment 1 Statement of Compliance

1. Proposal and Proponent details

Proposal Title	Ord River Irrigation Area Stage 2 (M2 Supply Channel)
Statement Number	938
Proponent Name	Minister for Regional Development
Proponent's Australian Company Number	Not applicable

2. Statement of Compliance Details

Reporting Period	1 January 2024 to 31 December 2024
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Implementation phase(s) during reporting period							
Pre-construction		Construction	✓	Operation	✓	Decommissioning	

Audit Tables for Statement 938 addressed in this Statement of Compliance is provided at Attachments:	2, 3 and 4
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Were all implementation conditions and/or procedures of the Statement complied with within the reporting period?			
No (proceed to Section 3)	✓	Yes (proceed to Section 4)	

3. Details of Non-compliance(s) and/or Potential Non-compliance(s)

Which implementation condition or procedure was non-compliant or potentially non-compliant?
<u>Conditions</u> Condition 4-5 and Condition 5-1 <u>Environmental Management Program</u> EMP 20, EMP 40, EMP 57, EMP 77, EMP 83, EMP 91, EMP 94, EMP 125, EMP 126, EMP 132, KEMP 132, EMP 133, EMP 135, EMP 136, EMP 138, EMP 139, EMP 162, EMP 163, EMP 164.
Was the implementation condition or procedure non-compliant or potentially non-compliant?
Condition 4-5 Non-compliant The CEO was not advised of all potential non-compliances with EMP provisions within 7 days. These potential non-compliances are listed in Table 6 of this CAR, and in Attachment 3 - Audit Table C – Statement 938 Environmental Management Program. Condition 5-1 Potentially non-compliant

The Proposal is assessed as non-compliant with condition 5-1 given potential non-compliances and some non-compliances with 19 of 178 EMP provisions.

These are listed in Table 6 of this CAR, and in Attachment 3 - Audit Table C – Statement 938 Environmental Management Program.

On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?

Not applicable

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?

No

Reported to DWER verbally Date _____

Reported to DWER in writing Date: 15 April 2024 and 13 December 2024.

Potential non-compliance items were reported to DWER via email on 15 April 2024 and by letter dated 13 December 2024. DPIRD notes that some reported items were rectified in 2024 or have since been re-assessed as compliant following additional evidence.

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?

Tables 5 and 6 and Audit Tables A (Attachment 2) and C (Attachment 4) provide details of the non-compliances and potential non-compliances.

What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)?

Weaber and Knox Creek Plains

What was the cause(s) of the non-compliance or potential non-compliance?

Tables 5 and 6 and Audit Tables A (Attachment 2) and C (Attachment 4) provide details of the non-compliances and potential non-compliances.

What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?

Refer to Table 6

What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?

Formal agreements are in place committing the Developer, KAI, the Development Partner, Keep Farming, and MG Corporation to complying with MS938 and the underlying management plans, to keeping related records and providing information to DPIRD to enable it to meet annual compliance reporting obligations.

DPIRD reinstated the Goomig-Knox Management Committee in June 2024, in accordance with the Development Agreement between the state and KAI to systematically address compliance matters and to progress overdue reviews and updates to the environmental management programs to bring them in line with contemporary outcome and risk-based approaches.

Provide information/documentation collected and recorded in relation to this implementation condition or procedure:

- in the reporting period addressed in this Statement of Compliance, and
- as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance

Refer to audit tables (Attachment 2, 3 and 4) and the associated Evidence folder.

4. Proponent Declaration

I, Susan Hall, Executive Director, Regional Business Development

declare that I am authorised on behalf of The Minister for Regional Development

(Being the person responsible for the proposal) to submit this form and that the information contained in this form is true and not misleading.

Signature:  Date: 22 June 2026

Please note that:

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

Attachment 2 Audit Table A – Conditions of Ministerial Statement 938

Audit code	Subject	Action	How	Evidence	Phase	Timeframe	Status	Further information
938:M1.1	Implementation	The proponent shall implement the proposal as documented and described in Schedule 1 of this Statement, subject to the conditions and procedures of this Statement.	Implement Proposal as described in Schedule 1	Refer to Attachment 2	Overall	Ongoing	C	Refer to Attachment 3
938:M2.1	Contact details	The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within 28 days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Submit written notification to the CEO of OEPA	Not applicable	Overall	Within 28 days of change of contact details.	NR	Minister for Regional Development nominated as proponent on 12 December 2017.
938:M3.1	Time limit for Proposal Implementation	The proponent shall not commence implementation of the proposal after the expiration of 5 years from the date of this Statement, and any commencement, within this 5-year period, must be substantial.	Substantial implementation of Proposal by 12 June 2018	Not applicable	Overall	By 12 June 2018	CLD	Item assessed as complete in previous auditing period.
938:M3.2	Time limit for Proposal Implementation	Any commencement of implementation of the proposal, within 5 years from the date of this Statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of 5 years from the date of this Statement.	Provide written evidence of substantial commencement of implementation on or before 12 June 2018	Not applicable	Overall	By 12 June 2018	CLD	Item assessed as complete in previous auditing period.
938:M4.1	Compliance reporting	The proponent shall prepare and maintain a Compliance Assessment Plan to the satisfaction of the CEO.	Prepare a Compliance Assessment Plan and submit to the CEO of OEPA for approval	Not applicable	Overall	Ongoing	CLD	Strategen (2013a) Ord River Irrigation Area Stage 2 (M2 Supply Channel), Compliance Assessment Plan – Statement 938 Approved by letter from OEPA dated 2 October 2013.

Audit code	Subject	Action	How	Evidence	Phase	Timeframe	Status	Further information
								Item assessed as complete in a previous audit period.
938:M4.2	Compliance reporting	The Compliance Assessment Plan shall indicate: (a) the frequency of compliance reporting, (b) the approach and timing of compliance assessments, (c) the retention of compliance assessments, (d) reporting of potential non-compliances and corrective actions taken, (e) the table of contents of compliance reports, and (f) public availability of compliance reports.	Prepare a Compliance Assessment Plan addressing all requirements	Not applicable	Overall	Prior to implementation	CLD	Item assessed as complete in a previous audit period.
938:M4.3	Compliance reporting	The proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by Condition 4-1.	Undertake annual compliance assessments in accordance with the approved Compliance Assessment Plan	This Compliance Assessment Report	Overall	Ongoing	C	-
938:M4.4	Compliance reporting	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by Condition 4-1 and shall make those reports available when requested by the CEO.	Prepare and retain Annual Compliance Assessment Reports in accordance with the approved Compliance Assessment Plan Make compliance assessment reports available to CEO of OEPA on request	Reports of all compliance assessments are retained in DPIRD's Objective ECM records keeping system. Reports are also published on DPIRD's website here: https://www.dpird.wa.gov.au/regional-communities/major-projects/ord-expansion-project/ord-expansion-project-western-australian-	Overall	Ongoing	C	-

Audit code	Subject	Action	How	Evidence	Phase	Timeframe	Status	Further information
				environmental-approval-documents/				
938:M4.5	Compliance reporting	The proponent shall advise the CEO of any potential non-compliance within 7 days.	Written correspondence to CEO of OEPA within 7 days of any potential non-compliance	2024.938.M4.5a Ministerial Statement 938 – Notification of potential non-compliance 2024.938.M4.5b Ministerial Statement 938 – Notification of potential non-compliance	Overall	Within 7 days of a potential non-compliance being known	NC	The CEO was not notified of all potential non-compliances prior to submission of this Compliance Assessment Report 2024. Two potential non-compliance items were reported to DWER during the 2024 compliance reporting period. Refer to the evidence items for the details.
938:M4.6	Compliance reporting	The proponent shall submit a compliance assessment report annually from the date of issue of this Statement addressing the previous twelve-month period or other period as accepted by the CEO. The compliance assessment report shall: - be endorsed by the proponent's Managing Director or a person delegated to sign on the Managing Director's behalf, - include a statement as to whether the proponent has complied with the conditions, - identify all potential non-compliances and describe corrective and preventative actions taken, - be made publicly available in accordance with the approved Compliance Assessment Plan, and - indicate any proposed changes to the Compliance Assessment Plan required by Condition 4-1.	Submit Annual Compliance Assessment Reports addressing all requirements annually to OEPA	2024.938.M4.6 Submission of 2023 Compliance Assessment Report	Overall	By June 2014 and annually thereafter	C	Refer to evidence item. DPIRD notes that the submission of this 2024 will be assessed as non-compliant.
938:M5.1	Environmental Management Program	The proponent shall implement the proposal in accordance with the "Environmental Management Programme", dated July 2011, or	Implement approved Environmental Management Programme	Refer to Audit Table C in Attachment 4	Overall	Ongoing	NC	The Proposal is assessed as non-compliant with condition 5-1 because

Audit code	Subject	Action	How	Evidence	Phase	Timeframe	Status	Further information
		subsequent revisions approved by the CEO.						of non-compliances and potential non-compliances with 19 of 178 EMP provisions. These 19 non-compliances and potential non-compliances are listed in Table 6 of this CAR, and in Audit Table C in Attachment 4.
938:M6.1	Final Project Design	The proponent shall implement the proposal in accordance with the “Final Project Design Plan”, dated July 2011, or subsequent revisions approved by the CEO.	Implement approved Final Project Design Plan	2024.938.M6.1a Satellite image of Goomig development area dated June 2025. 2024.938.M6.1b Satellite image of Knox development area dated December 2024 2024.938.M6.1c Satellite image of Knox development area dated December 2024 with development boundary shown.	Overall	Ongoing	C	Established lots on deposited plans are consistent with the approved design plans. The satellite imagery provided as evidence also shows development consistent with approved design plans: Strategen (2010) Ord River Irrigation Area – Weaber Plain Development Project Phase 1 Final Project Design Plan Strategen (2011) Ord River Irrigation Area – Weaber Plain Development Project Phase 2 Final Project Design Plan KBC (2019) Knox Creek Plain Agricultural Development Final Project Design Plan Amended – July 2019 Revision C¹

¹ Revision C was superseded by a revised FPDP dated September 2025 (Keep Farming Pty Ltd, 2025), approved by DWER on 6 October 2025

Audit code	Subject	Action	How	Evidence	Phase	Timeframe	Status	Further information
938:M7.1	Final Decommissioning Plan	At least six months prior to the anticipated date of decommissioning, or at a time accepted by the CEO, the proponent shall prepare a Final Decommissioning Plan designed to ensure that the site is left in a suitable condition, with no liability to the State. The Final Decommissioning Plan shall be prepared in accordance with "Preliminary Decommissioning Plan", approved as part of the "Environmental Management Programme" dated July 2011 and required by Condition 5-1, or subsequent revisions approved by the CEO. The Final Decommissioning Plan shall address: • removal or, if appropriate, retention of plant and infrastructure, • rehabilitation of all disturbed areas to a standard suitable for the accepted new land use(s), and • identification of contaminated areas, including provision of evidence of notification to relevant statutory authorities.	Prepare a Final Decommissioning Plan addressing all requirements and submit to CEO of OEPA for approval in accordance with timeframe	Not applicable	Overall	At least six months prior to the anticipated date of decommissioning or at a time accepted by the CEO	NR	There is currently no intention to decommission the proposal.
938:M7.2	Final Decommissioning Plan	The proponent shall implement the Final Decommissioning Plan required by Condition 7-1 until such time as the CEO determines that decommissioning is complete.	Implement Final Decommissioning Plan	Not applicable	Decommissioning	Until such time as the CEO determines that decommissioning is complete	NR	There is currently no intention to decommission the proposal.
938:M7.3	Final Decommissioning Plan	The proponent shall make the Final Decommissioning Plan required by Condition 7-1 publicly available, to the requirements of the CEO.	Make Final Decommissioning Plan available to stakeholder or public upon request and within 7 days of the receipt of the request	Not applicable	Overall	To the requirements of the CEO	NR	There is currently no intention to decommission the proposal.

Attachment 3 Audit Table B - Schedule 1 of Statement 938

Audit Code	Element	Description	Evidence	Status	Comments
S1_2.1	Land within the Project Area	Project Area 76,000 ha	2024.938.M6.1a Satellite image of Goomig development area dated June 2025. 2024.938.M6.1b Satellite image of Knox development area dated December 2024 2024.938.M6.1c Satellite image of Knox development area dated December 2024 with development boundary shown.	C	Clearing to date is as follows: - Weaber Plain – farm area: 7,416 ha within farm lot area of 7,643 ha (no change in 2024) - Weaber Plain – infrastructure: 943.02 ha, including Moonamang Road realignment (no change in 2024) - Knox Plain – 5,460 hectares, including 52 ha for the Knox Supply Channel TOTAL: 13,819 ha No further clearing was undertaken in 2024.
S1_2.2		Land managed as buffer 42,500ha		C	The established Weaber Plain buffer area is 11,545 ha (Lot 425 on Plan 400992 and Lot 404 on Plan 75732). This is consistent with the approved Phase 2 (Weaber Plain) FPDP that designates a buffer area of approximately 11,470 ha (Strategen 2011). Table 1 in the approved Knox FPDP dated September 2025 identifies a buffer area of 6,834 ha.
S1_2.3		Land for irrigable development 30,500ha		C	As above, a total of 7,416 ha has been cleared for farms and ancillary infrastructure (i.e., irrigable development) within established farm lots in the Weaber Plain development area totalling 7,643 ha. A further 809.2 ha of farm lots (Lots 4, 7, and 11) remained uncleared by the end of the 2024 compliance assessment period. The approved Knox FPDP dated September 2025 provides for a 5,760 ha development area (land for irrigable development). A total of 5,460 ha had been cleared by the end of 2024, including 52 ha for the Knox Supply Channel.
S1_2.4		Infrastructure area 3,000ha		C	A total of 995.02 ha has been cleared for infrastructure to date on the Weaber and Knox Creek Plains, including 52 ha cleared in 2022 for construction of the Knox Supply Channel. No additional clearing occurred in 2024.
S1_2.5	Land outside the Project Area	M2 Channel (lake Kununurra to project area) 690 ha	Not applicable	NR	No clearing was undertaken on land outside the Project Area in 2024.
S1_2.6		Wyndham Port Facilities 1ha	Not applicable	NR	No activity associated with Wyndham Port Facilities occurred in the compliance assessment period.
S1_2.7	Production	Raw sugar 400,000tpa	2024.S1_2.7 Goomig-Knox Surface Water Report 2024 (KAI 2025)	NR	No sugar has been grown in the Project Area since commencement, including the 2024 compliance assessment period. Cotton (180ha), hay (300ha) and maize (2,300ha) were grown on Goomig during the 2024 compliance assessment period.

					Approximately 600ha of sorghum was dryland cropped on Knox Lot 352 in 2024.
S1_2.8		Molasses 160,000tpa	2024.S1_2.7 Goomig-Knox Surface Water Report 2024 (KAI 2025)	NR	As above.
S1_2.9	Infrastructure	Irrigation Channels 160km	Refer to the evidence provided at 938:M6.1.	C	37 km of main supply channels have been constructed to date. An 8.5 km corridor (52 ha) of native vegetation was cleared in 2022 to provide for the construction of the Knox Supply Channel consistent with the Knox Creek Plain FPDP. The Knox Supply Channel is an extension of the M2 supply channel.
S1_2.10		Annual water requirements 740GL	2024.S1_2.7 Goomig-Knox Surface Water Report 2024 (KAI 2025)	C	The annual Goomig-Knox Surface Water Management Report 2024 reports that the OIC released 26.1 GL to the Goomig farmlands in 2024 through the M2C3 structure. Of this, the offtake meters recorded 20.9 GL delivered to Goomig farms for irrigation during the 2024 irrigation season.
S1_2.11		Drains 153km	Refer to the evidence provided at 938:M6.1.	C	51 km of major drains had been constructed prior to commencement of the Knox Creek Plain development. Keep Farming Pty Ltd commenced development of levees and drains in the Knox Creek Plain development area in 2023 with construction continuing in 2024. All drains are within the approved development area.
S1_2.12		Flood protection levees 142km	Refer to the evidence provided at 938:M6.1.	C	48 km of flood protection levees had been constructed prior to the commencement of the Knox Creek Plan development. Keep Farming Pty Ltd commenced development of levees and drains in the Knox Creek Plain development area in 2023 with construction continuing in 2024. All levees are within the approved development area.
S1_2.13		Balancing storage dams (operating volume) 5.6GL	Not applicable	C	As noted by the previous auditor (KBC 2022), balancing storage for the Weaber Plain development is contained within the M2 channel between the M2C3 and M2C4 structures. The reach of the M2 channel between the M2C3 and M2C4 structures holds up to 390 ML, of which 100 ML is considered 'operational storage' (i.e., balancing storage). The approved Knox FPDP identifies two tailwater recycling and balancing storage dams covering 150ha positioned in the southern farm area.
S1_2.14		Roads 161km	Not applicable	C	No roads were constructed in the 2024 compliance assessment period. 49.2 km of roads have been constructed to date: - Moonamang Road - Minjiljirrga Lane - Wooljim Lane - Jandami Lane
S1_2.15		Power lines 165km	Not applicable	C	No power lines have been constructed to date.
S1_2.16	Wyndham Port	Raw sugar store 180,000t	2024.S1_2.7	NR	No sugar was grown in the 2024 compliance assessment period.

			Goomig-Knox Surface Water Management Report 2024 (KAI 2025)		Cotton (180ha), hay (300ha) and maize (2,300ha) were grown on Goomig during the 2024 compliance assessment period. Approximately 600 ha of sorghum was dryland cropped on Knox Lot 352 in 2024.
S1_2.17		Molasses store 75,000	2024.S1_2.7 Goomig-Knox Surface Water Management Report 2024 (KAI 2025)	NR	No sugar was grown for molasses production occurred in the compliance assessment period. Cotton (180ha), hay (300ha) and maize (2,300ha) were grown on Goomig during the 2024 compliance assessment period. Approximately 600ha of sorghum was dryland cropped on Knox Lot 352 in 2024.

Attachment 4 Audit Table C – Statement 938 Environmental Management Program

Soil conservation management actions

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 1	Provide an Information Package to the owner/leaseholder, which outlines: - the susceptibility of soil from disturbed areas to erosion from high intensity rainfall during the wet season. - soil erosion prevention measures. - irrigation strategies to reduce potential impacts of sodicity and salinity. - procedures to monitor soil salinity and sodicity.	To reduce the potential for agricultural practices to result in erosion by ensuring prospective landowners are aware of the appropriate risks and management measures.	At sub-lease/sale of lots	Not applicable	CLD	CLD	<u>Weaber Plain</u> Item assessed as completed in a previous audit period. <u>Knox Creek Plain</u> Item assessed as completed in a previous audit period (KBC 2022).
EMP 2	Induct construction personnel on soil erosion control management measures.	To reduce the potential for construction activities to result in erosion by ensuring construction personnel are aware of appropriate management measures.	Within one week of personnel commencing work on-site	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025 2024.EMP.2b – Knox northern levee looking east 2024.EMP.2c – Knox northern levee looking west 2024.EMP.2d – Drone images (17 June 2024)	CLD	C	<u>Weaber Plain</u> The Weaber Plain development construction phase is complete. <u>Knox Creek Plain</u> DPIRD site inspection on 16 April 2025 showed no significant erosion (2024.EMP2a). Inspection of Knox northern levees and drains on 14 June 2024 showed no erosion into the adjacent buffer area. Refer to 2024.EMP2b and 2c – Knox northern levee photo Inspection of Knox eastern levees and drains by drone on 17 June 2024 showed no evidence of erosion into the buffer area. Refer to 2024.EMP2d – Drone images (17 June 2024). DPIRD has not obtained evidence of personnel environmental inductions being completed in the 2024 compliance reporting period. However, the evidence provided shows no significant erosion into the surrounding environment. Senior DPIRD staff completed Keep Farming's environmental induction alongside Goomig-Knox Independent Review Group members (EPBC2010/5491) prior to a site visit on 10 April 2025. This involved a PowerPoint presentation and

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
							information package addressing health, safety and environmental requirements.
EMP 3	Maintain records of ground disturbing activities that include the date that the boundary of clearing was delineated, the date of clearing and location of topsoil storage.	To provide data to inform management.	During construction of shared infrastructure	Refer to the evidence provided at 938:M6.1.	CLD	-	<u>Weaber Plain</u> Construction of shared infrastructure on the Weaber Plain was completed in 2014. <u>Knox Creek Plain</u> There is no shared infrastructure being constructed on Knox. No clearing was undertaken in 2024. Development boundaries were surveyed and marked prior to 2024. Satellite and aerial imagery show that clearing does not extend beyond the approved boundaries.
EMP 4	Restrict ground-disturbing activities to the dry season wherever practicable.	To prevent ground-disturbing activities when the risk of erosion is high.	During construction of shared infrastructure	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	CLD	-	<u>Weaber Plain</u> Construction of shared infrastructure on the Weaber Plain was completed in 2014. <u>Knox Creek Plain</u> There is no shared infrastructure being constructed on Knox. No clearing was undertaken in 2024. Construction activities in cleared areas were undertaken prior to the commencement of 2024-2025 wet season rainfall. Site inspection on 16 April 2025 showed no significant erosion (2024.EMP.2a).
EMP 5	Ensure a drainage management system that includes a sediment trap is in place around all borrow pits.	To reduce the potential for erosion of borrow pits to result in adverse environmental impacts.	Prior to ground disturbance	2024.EMP.5a – Area 11 – Sediment traps, drainage and topsoil stockpiles 2024.EMP.5b – Area 11 sediment trap – North (8 May 2025) 2024.EMP.5c – Area 11 sediment trap – South (8 May 2025)	C	NR	There was only one raw materials extraction area within the Proposal area in 2024, located in the Goomig buffer. The site was established during the construction phase and is referred to as the Area 11. Sediment traps are in place in Area 11. Refer to 2024.EMP.5a, 2024.EMP.5b, and 2024.EMP5c. There were no borrow pits established or under development in the Knox buffer area in 2024. The approved Knox FPDP dated September 2025 includes a borrow pit in the Knox buffer area.
EMP 6	Delineate the boundaries of the vegetation to be cleared for construction in the field with flagging tape, signage or fencing.	To minimise erosion by preventing unauthorised ground disturbance.	Prior to ground disturbance	Refer to the evidence provided at 938:M6.1.	NR	C	<u>Weaber Plain</u> No clearing was undertaken in the Weaber Plain development area in 2024.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
							<u>Knox Creek Plain</u> No clearing was undertaken in the Knox Creek Plain development area in 2024 (no clearing since December 2023). There are a few small lots still to be cleared – Lots 370, 354, 362 and 366 in accordance with the approved Knox FPDP dated September 2025.
EMP 7	Stage clearing of vegetation so that areas are cleared only as required	To reduce the potential for erosion by minimising the area of ground surface exposed at any one time, to allow native animals the chance to move on.	During construction of shared infrastructure	-	CLD	-	<u>Weaber Plain</u> Construction of shared infrastructure on the Weaber Plain was completed in 2014. <u>Knox Creek Plain</u> There is no shared infrastructure being constructed on Knox. There was no clearing of vegetation in the Knox development area in 2024. There are a few small lots still to be cleared – Lots 370, 354, 362 and 366 in accordance with the approved Knox FPDP dated September 2025.
EMP 8	Restrict movement of construction machinery and equipment to designated tracks and roads.	To prevent unauthorised ground disturbance.	During construction of shared infrastructure	2024.EMP.8a – File note of site inspection – Knox operations centre – 8 April 2024 2024.EMP.8b – File note of site inspection – Knox operations centre – 28 August 2024 2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	CLD	-	<u>Weaber Plain</u> Construction of shared infrastructure on the Weaber Plain was completed in 2014. <u>Knox Creek Plain</u> There is no shared infrastructure being constructed on Knox. Construction machinery and equipment was restricted to the development area at the time of formal site inspections on 28 April 2024, 28 August 2024 and 16 April 2025; and during other visits to the Knox development area and buffer in 2024.
EMP 9	Maintain records of topsoil stockpiles that include the location of stockpile and location of where topsoil was removed from.	To ensure topsoil is utilised in the most appropriate locations.	During construction of shared infrastructure	2024.EMP.5a – Area 11 – Sediment traps, drainage and topsoil stockpiles	CLD	-	<u>Weaber Plain</u> Construction of shared infrastructure on the Weaber Plain was completed in 2014. Area 11 topsoil stockpiles are recorded (2024.EMP9) <u>Knox Creek Plain</u> There is no shared infrastructure being constructed on Knox. There are no disturbed areas on the

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
							Knox Creek Plain that will require rehabilitation (therefore topsoil has not been stored). The approved Knox FPDP dated September 2025 includes a proposed borrow pit in the Knox buffer area. The FPDP (p.50) states that a rehabilitation plan is under development.
EMP 10	Remove topsoil from: - all areas to be excavated, - all areas where spoil from excavation is to be stored.	To provide a natural source of seed, organic matter and microorganisms for areas to be rehabilitated.	During construction of shared infrastructure	Refer to EMP 9	CLD	NR	Refer to EMP 9
EMP 11	Stockpile cleared topsoil and subsoil separately, away from irrigation channels, for later use in rehabilitation in accordance with the Rehabilitation Management Sub-plan	To provide a natural source of seed, organic matter and microorganisms for areas to be rehabilitated.	During construction of shared infrastructure	Refer to EMP 9	CLD	NR	Refer to EMP 9
EMP 12	Install topsoil containment measures such as sediment fencing around stockpiles.	To reduce potential for erosion of topsoil stockpiles.	During construction of shared infrastructure	2024.EMP.12 – Photo of topsoil stockpile – Area 11 – 13 November 2024	CLD	NR	Refer to EMP 9 Vegetation has regrown over old topsoil stockpiles in Area 11 which mitigates erosion (2024.EMP12).
EMP 13	Install signage to prevent unauthorised access to the buffer in accordance with the Buffer Management Sub-plan.	To prevent damage to the buffer from unauthorised access.	Prior to ground disturbance	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	CLD	C	<u>Weaber Plain</u> There is still some original signage visible, however, the buffer area is practically difficult to access, and entry points are obscure which mitigates unauthorised access. the action is to 'install buffer signage prior to ground disturbance'. This is a pre-disturbance requirement which was met in a previous audit period (2012). In any case, no unauthorised access to the buffer area was observed by DPIRD during multiple visits to the Goomig buffer area over the course of 2024 therefore the purpose of this action has been achieved. The visits to the buffer areas included: - Buffer vegetation condition assessment (June 2024) - Weed monitoring (October 2024) - Groundwater monitoring program (September 2024) - Fencing and fire break inspection (August 2024) - Typhonium surveys (February and March 2024). <u>Knox Creek Plain</u>

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
							Farm biosecurity signs are posted at every ingress point to the Knox development area (see Photo 45 in 2024.EMP.2a) which discourages access to the development area and, consequently, to the buffer areas beyond. There are no signs at the entry points to the buffer area. However, DPIRD notes that the biosecurity signage and that the buffer area is practically difficult to access thus achieving the intent of discouraging people from accessing the area. No unauthorised access to the buffer area was observed by DPIRD during multiple visits to the Knox buffer area over the course of 2024 therefore the purpose of this action has been achieved. The visits to the buffer areas included: • Typhonium monitoring (February 2024). • Buffer vegetation condition assessment (June 2024) • Levee wall inspections (June 2024) • Weed monitoring (September 2024) • Groundwater monitoring program (September 2024)
EMP 14	Rehabilitate areas disturbed as a result of construction that are no longer required post-construction in accordance with the Rehabilitation Management Sub-plan.	To maximise the potential for successful rehabilitation.	As specified in the Rehabilitation Management Sub-plan	Not applicable	CLD	NR	<u>Weaber Plain</u> This item was assessed as completed in a previous audit period. Refer to the Rehabilitation management and monitoring items (EMP162 to EMP165) regarding rehabilitation monitoring. <u>Knox Creek Plain</u> There areas disturbed on the Knox Creek Plain to date that will require rehabilitation. Refer to EMP 9 regarding rehabilitation of proposed borrow pit in the Knox buffer area.

Soil monitoring regime

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 15	Soil erosion within 50m of construction activities.	Weekly during construction of shared infrastructure	No soil erosion occurring as a result of construction activities.	- Investigate cause of erosion. - Investigate ways to minimise erosion and increase landform stability. - Implement remedy. - Monitor success of remedy.	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025 2024.EMP.2b – Knox northern levee looking east 2024.EMP.2c – Knox northern levee looking west 2024.EMP.2d – Drone images (17 June 2024)	CLD	-	<u>Weaber Plain</u> Construction of shared infrastructure on the Weaber Plain was completed in 2014. <u>Knox Creek Plain</u> There is no shared infrastructure being constructed on Knox. Refer to EMP 2. There is no evidence of significant soil erosion associated with construction activities.
EMP 16	Management of topsoil stockpiles.	Weekly during construction of shared infrastructure	Topsoil stockpiles are being managed appropriately, including no indication of erosion present.	- Investigate cause of erosion. - Investigate ways to minimise erosion and increase landform stability. - Implement remedy. - Monitor success of remedy.	2024.EMP.5a – Area 11 – Sediment traps, drainage and topsoil stockpiles 2024.EMP.12 – Photo of topsoil stockpile – Area 11 – 13 November 2024	CLD	-	<u>Weaber Plain</u> This item was assessed as completed in a previous audit. What was previously thought to be a ‘blow out’ in a topsoil stockpile in Area 11 is an intentional drainage intervention in the bund that partly surrounds the southern extraction area (pers comm M.Fawcett, personal communication, 8 May 2025). There are old topsoil stockpiles located in Area 11. Vegetation regrowth over these stockpiles mitigates erosion. <u>Knox Creek Plain</u> There is no shared infrastructure being constructed on Knox. Refer to EMP9
EMP 17	Extent of clearing and ground disturbance along pre-defined boundaries.	Weekly during construction of shared infrastructure	No clearing or disturbance outside of pre-defined boundaries (Figure 2).	Report as Environmental Incident and initiate Incident Procedure	Refer to 938:M6.1 and EMP 3	NR	-	There is no shared infrastructure being constructed on Knox. Refer to 938:M6.1 and EMP 3.

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 18	Soil erosion within 50 m of infrastructure (including roads, channels, sediment basins and hillside drains).	As required after construction, for example after significant rainfall events.	Landform is safe and stable with no soil erosion occurring as a result of runoff from infrastructure.	- Investigate cause. - Identify ways to reduce erosion from infrastructure such as reducing runoff velocity, diverting runoff and application of hydromulch to areas identified as susceptible to erosion from runoff. - Implement remedy. - Monitor success of remedy.	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	C	C	<u>Weaber Plain</u> No significant erosion observed in 2024. <u>Knox Creek Plain</u> Refer to EMP 2. DPIRD site inspection on 16 April 2025 showed no significant erosion (2024.EMP2a).
EMP 19	Surface and subsoil electrical conductivity within the project area, with a specific focus on areas with Aquitaine clay soils, including: - at least one sample from each lot - a representative spread of sites throughout the Buffer Area.	Twelve monthly, commencing prior to clearing and at the end of each dry season during operation of irrigation infrastructure.	Salinity levels do not exceed 400 mS/m in surface or subsurface soils.	- Map the distribution of soil with salinity exceeding target levels. - Investigate cause (which could include determining if salinity is due to a rise in the groundwater or whether the soil chemical status is deteriorating from insufficient irrigation). - Verify the adequacy of the estimated leaching rate (approximately 100 mm/a) in controlling sodicity in accordance with the Groundwater Management Sub-plan. - Identify whether remedial action is required, such as installation of field drains in accordance with the Groundwater Management Sub-plan. - Implement remedial action on a trial basis in areas identified from mapping. - Monitor success of remedy, increasing the frequency of soil monitoring if salinity exceeds target levels.	2024.EMP.19a Soil sampling results Goomig 2024 2024.EMP.19b Soil sampling results Knox 2024 2024.EMP.19c Laboratory results - Goomig soils 2024 2024.EMP.19d Laboratory results - Knox soils 2024	C	C	Refer to evidence documents. 2024 values are below the 400 mS/cm Ece threshold.

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 20	Surface and subsoil ESP and pH within the project area, with a specific focus on areas with Aquitaine clay soils, including: • at least one sample from each lot • a representative spread of sites throughout the Buffer Area.	Twelve monthly, commencing prior to clearing and at the end of each dry season during operation of irrigation infrastructure.	Sodicity levels five years after commencement of irrigation do not exceed an ESP of 6 in surface soils or 15 in subsurface soils.	• Map the distribution of soil with sodicity exceeding target levels. • Investigate cause (which could include determining if changes are consistent with the anticipated initial response to land use change, or whether the soil chemical status is deteriorating as a result of insufficient irrigation). • Verify the adequacy of the estimated leaching rate (approximately 100 mm/a) in controlling sodicity in accordance with the Groundwater Management Sub-plan. • Identify whether remedial action is required, such as application of gypsum or sulphur. • Implement remedial action on a trial basis in areas identified by mapping. • Monitor success of remedy, increasing the frequency of soil monitoring if salinity exceeds target levels.	2024.EMP.19a Soil sampling results Goomig 2024 2024.EMP.19b Soil sampling results Knox 2024 2024.EMP.19c Laboratory results - Goomig soils 2024 2024.EMP.19d Laboratory results - Knox soils 2024	PNC	C	<u>Weaber Plain</u> One minor exceedance was recorded in sub-surface soils at buffer sampling site 2 where sodicity was recorded at 15.3, just above the target of 15. No other exceedances were recorded. The sodicity assessment relates to the impact of adding irrigation water, with the Buffer sites for comparison. An exceedance of the sodicity target in the buffer (unirrigated) is likely to be naturally occurring and not impacted by the addition of water to the Goomig farms. However, the buffer is within the project area and has therefore been assessed as potentially non-compliant. <u>Knox Creek Plain</u> No sodicity exceedances were recorded on the Knox Creek Plain, therefore this item is assessed as compliant.

Chemicals management actions

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 21	Prospective land managers will be advised of the requirement to comply with procedures for chemical application, and chemical management legislation including: • <i>Agricultural and Veterinary Chemicals Code Act 1994</i> (Cwth) and associated acts and regulations • <i>Health (Pesticides) Regulations 2011</i> • <i>Aerial Spraying Control Act 1966</i> (WA) • <i>Agricultural Produce (Chemical Residues) Act 1983</i> (WA) • <i>Poisons Act 1964</i> (WA) • <i>Veterinary Preparations and Animal Feeding Stuffs Act 1976</i> (WA) • <i>Agriculture and Related Resources (Spraying Restriction) Regulations 1979</i>.	To reduce the potential for contamination of the environment by farm chemicals by ensuring that farm owners/managers are aware of the specified procedures for chemical application in the project area and informed of their rights and responsibilities under the relevant Acts and Regulations.	At sub-lease of lots.	Copies of relevant agreements can be provided.	CLD	CLD	<u>Weaber Plain</u> Item assessed as completed in a previous audit period (Strategen 2015). <u>Knox Creek Plain</u> The Developer and the Knox Development Partner have been advised and are aware of the requirement to comply with the Knox EMP. The requirement to comply with the environmental approvals, which include the approved EMPs, are documented in various agreements. However, some non-compliances with the actions in the chemical management were recorded and reported to DWER during the compliance period. These addressed in the following items.
EMP 22	Induct personnel on safe use of chemicals and hydrocarbon management measures, including hydrocarbon handling, disposal, and spill response procedures.	To reduce the risk of contamination of the environment.	Within one week of personnel commencing work on site	2024.EMP.22a – File note of site inspection – Goomig – 22 April 2024 2024.EMP.22b - Email communication requiring rectification of improper chemical management 2024.EMP.8a – File note of site inspection – Knox	C	C	<u>Weaber Plain</u> Inspection of the Goomig operations area on Lot 3 on 22 April 2024 found improper storage of chemicals and improper washdown facilities (refer to 2024.EMP22). <u>Knox Creek Plain</u> Inspection of the Knox Development operations centre area on 8 April 2024 found non-compliances with chemical management actions in the Knox EMP (2024.EMP8a). Follow up inspection of the Goomig operations area on Lot 3 on 28 June 2024 found that chemicals had been removed from site and the washdown facilities had also been removed. Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
				operations centre – 8 April 2024			
EMP 23	Ensure storage of farm chemicals complies with relevant Australian and Western Australian Standards, including AS 2507-1998 <i>“The storage and handling of agricultural and veterinary chemicals”</i> and Department of Water <i>Toxic and Hazardous Substances – Storage and Use WQPN No. 65</i> .	To prevent potential contamination of the environment and harm to individuals by ensuring appropriate storage and handling of chemicals.	Ongoing from commencement of ground disturbance	2024.EMP.22a – File note of site inspection – Goomig – 22 April 2024 2024.EMP.23 – File note of site inspection – Goomig – 28 June 2024 2024.EMP.8a – File note of site inspection – Knox operations centre – 8 April 2024 2024.EMP.8b – File note of site inspection – Knox operations centre – 28 August 2024	C	C	<u>Weaber Plain</u> Inspection of the Goomig operations area on Lot 3 on 22 April 2024 found improper storage of chemicals and improper washdown facilities (refer to 2024.EMP22). Follow up inspection on 28 June 2024 found that chemicals had been removed from site and the washdown facilities had also been removed (refer 2024.EMP23). Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant. <u>Knox Creek Plain</u> Inspection of the Knox Development operations centre area on 8 April 2024 found improper storage and handling of hydrocarbons and other chemicals (2024.EMP8a). The non-compliance was reported to DWER via email on 15 April 2024 (2024.938.M4.5a). Follow up inspection on 28 August 2024 found that the non-compliances had been rectified (2024.EMP8b). Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant.
EMP 24	All hydrocarbons will be stored in accordance with the following: • <i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007 (WA)</i> • Australian Standard AS 1940-2004: The Storage and Handling of Flammable and Combustible Liquids.	To minimise the potential for hydrocarbon contamination of the environment.	Ongoing from commencement of ground disturbance	2024.EMP.22a – File note of site inspection – Goomig – 22 April 2024 2024.EMP.8a – File note of site inspection – Knox operations centre – 8 April 2024 2024.938.M4.5a Ministerial Statement 938 – Notification of	C	C	<u>Weaber Plain</u> Inspection on 22 April 2024 found compliant storage of hydrocarbons (refer photos 8 to 12 in 2024.EMP22). <u>Knox Creek Plain</u> Inspection of the Knox Development operations centre area on 8 April 2025 found improper storage and handling of hydrocarbons and other chemicals (2024.EMP8a). The non-compliance was reported to DWER on 15 April 2024 (2024.938.M4.5a).

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
				potential non-compliance 2024.EMP.8b – File note of site inspection – Knox operations centre – 28 August 2024			Follow up inspection on 28 August 2024 found that the non-compliances had been rectified (2024.EMP8b). Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant.
EMP 25	Generators will be located on bunded platforms to contain any fuel leaks.	To minimise the potential for spills and leaks to contaminate the environment.	Ongoing from commencement of ground disturbance	2024.EMP.22a – File note of site inspection – Goomig – 22 April 2024 2024.EMP.8a – File note of site inspection – Knox operations centre – 8 April 2024	C	C	<u>Weaber Plain</u> Inspection on 22 April 2024 found generators to be appropriately bunded (refer to 2024.EMP22). <u>Knox Creek Plain</u> Inspection of the Knox Development operations centre area on 8 April 2025 found generators to be appropriately bunded (2024.EMP8a).
EMP 26	Maintain appropriate spill response equipment and Material Safety Data Sheet (MSDS) information in all hydrocarbon storage and re-fuelling areas and maintenance areas.	To minimise the potential for spills and leaks to contaminate the environment.	Ongoing from commencement of ground disturbance	2024.EMP.23 – File note of site inspection – Goomig – 28 June 2024 2024.EMP.8b – File note of site inspection – Knox operations centre – 28 August 2024	C	C	<u>Weaber Plain</u> Follow up inspection on 28 June 2024 found spill response equipment was on site. KAI advised that MSDSs were available to staff in digital format. <u>Knox Creek Plain</u> Inspection on 28 August 2024 found spill response equipment in place.
EMP 27	Persons designated as responsible for the storage and handling of fertiliser on farms be provided with appropriate training and instruction	To prevent potential contamination of the environment by ensuring appropriate storage and handling of fertilisers.	Ongoing from commencement of ground disturbance	No assessed	Not assessed	Not assessed	Not assessed
EMP 28	Transport dangerous goods in accordance with the <i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i> (WA).	To ensure dangerous goods are stored appropriately during transport (e.g. on absorbent material, provision of spill kit, well-ventilated, appropriate documentation and provision of personnel protection equipment for safe handling).	Ongoing from commencement of ground disturbance	Not applicable	N/A	N/A	This item deals with an activity outside the Project Area.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 29	Notify the DPW AND/OR DER of hydrocarbon spills in accordance with the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> .	To ensure potential spills are appropriately assessed and remediated according to the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> as hydrocarbons are a Schedule 1 Material in these Regulations.	In accordance with Incident Response Procedure	2024.EMP.22a – File Note of site inspection – Goomig – 22 April 2024 2024.EMP.8a – File note of site inspection – Knox operations centre – 8 April 2024 2024.938.M4.5a Ministerial Statement 938 – Notification of potential non-compliance	C	C	<u>Weaber Plain</u> There was no evidence of hydrocarbon spills observed during site inspection on 22 April 2024 (2024.EMP22). <u>Knox Creek Plain</u> Small hydrocarbon spills were observed during site inspection on 8 April 2024 (2024.EMP8a). The potential non-compliance was reported to DWER on 15 April 2024 (refer to 2024.938.M4.5). Follow up inspection on 28 August 2024 found that the potential non-compliance had been rectified. DPIRD doesn't consider a small hydrocarbon spill can be classified as an unauthorised discharge in accordance with the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>. Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant.
EMP 30	Maintain registers of all chemicals applied on-site as required under applicable chemical usage legislation.	To provide data for review if monitoring indicates unacceptable impacts to the environment.	Ongoing from commencement of ground disturbance	2024.EMP.30a – Goomig 2024 spray records 2024.EMP.30b – Knox 2024 spray records	C	C	Refer to evidence items
EMP 31	Restrict chemical and fertiliser use when the tailwater retention capacity is unavailable	To prevent the transporting of nutrients and chemicals downstream	Ongoing from commencement of ground disturbance	Refer to EMP 97	C	NR	<u>Weaber Plain</u> Refer to EMP 97 <u>Knox Creek Plain</u> Irrigated cropping had not yet commenced in the Knox Creek Plain development area in 2024.
EMP 32	Commercial pesticide and herbicide spraying will be undertaken only by operators with the appropriate level of ChemCert accreditation.	To minimise spray drift.	Ongoing from commencement of ground disturbance	2024.EMP.32a CASA Air Operator's Certificate 2024.EMP.32b Spray safe Pilot Accreditation	C	C	Refer to evidence items

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 33	Ensure agricultural chemicals are not directly applied to dedicated on-farm access tracks.	To prevent off-site transportation of chemicals in dust lift-off from access tracks.	Ongoing from commencement of ground disturbance	Refer to EMP 32	C	C	Pesticide and herbicide spraying is undertaken only by operators with the appropriate accreditation.
EMP 34	Chemicals will be applied in accordance with the product label.	To prevent potential contamination of the environment by ensuring appropriate application of chemicals.	Ongoing from commencement of ground disturbance	-	Not assessed	Not assessed	The auditor did not assess this item directly. DPIRD notes that applying chemicals in accordance with the product label is a legal requirement dealt with under separate legislation. Refer to EMP 93 and EMP 102 which deal with water quality outcomes.
EMP 35	Maintain a register of all aerial spraying operations.	To minimise potential for environmental impacts by ensuring aerial spraying is carried out in an acceptable manner.	Ongoing from commencement of ground disturbance	Refer to EMP30	C	C	Refer to EMP30
EMP 36	Use accredited operators (e.g. by operators and pilots accredited under the Aerial Agricultural Association of Australia (AAAA) "Spraysafe" program)	To minimise potential for environmental impacts by ensuring aerial spraying is carried out in an acceptable manner, to determine extent of required spray fall-out monitoring.	Ongoing from commencement of ground disturbance	Refer to EMP32	C	C	Refer to EMP32
EMP 37	Notify neighbours within: 1500 m of an area to be sprayed with ultra-low volume, 750 m of an area to be sprayed with emulsifiable concentrate by air. Consideration should be given to provide a range of dates in case conditions are not conducive to safely apply the pesticide and to minimise spray drift.	To minimise the risk of adverse health effects caused by spray fall-out.	Ongoing from commencement of ground disturbance	-	C	NR	<u>Weaber Plain</u> KAI has previously advised that the operator of Goomig Lot 16 and Goomig sub-lessees are notified of spray activities and that those operators reciprocate. <u>Knox Creek Plain</u> Irrigated cropping had not yet commenced in the Knox Creek Plain development area in 2024. Neighbours to the Knox development include Legune Station pastoral lessee and Boab Metals, Sorby Hills mining tenement holder.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 38	Design chemical washdown facilities in accordance with Department of Water, Water Quality Protection Notes on: - Mechanical Equipment Washdown (WQPN No. 68) - Chemical Blending (WQPN No. 7).	To minimise potential for environmental impacts by ensuring appropriate siting (location), design and construction of chemical wash down facilities.	Prior to commencement of planting of crops	2024.EMP.22 – File note of site inspection – Goomig – 22 April 2024 2024.EMP.23 – File note of site inspection – Goomig – 28 June 2024 2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	C	C	<u>Weaber Plain</u> Inspection of the Goomig operations area on Lot 3 on 22 April 2024 found improper storage of chemicals and improper washdown facilities (refer to 2024.EMP22). Follow up inspection on 28 June 2024 found that chemicals had been removed from site and the washdown facilities had also been removed (refer 2024.EMP23). Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant <u>Knox Creek Plain</u> Inspection on 8 April 2024 found that mechanical workshop activities are being undertaken within a concrete-floored shed on site. There were no fit-for-purpose chemical washdown facilities onsite but there was also no evidence chemical washdown was being undertaken. Keep Farming advised at inspection on 16 April 2025 that there is no vehicle washdown facility on site. Vehicles are presently (dry) blown out and manually wiped clean. There are plans to build a washdown facility.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 39	All chemical blending and decanting will be undertaken within a fully contained area.	To minimise potential for environmental impacts by ensuring chemical spills are contained.	Ongoing from commencement of irrigation	2024.EMP.22a – File note of site inspection – Goomig – 22 April 2024 2024.EMP.8a – File note of site inspection – Knox operations centre – 8 April 2024 2024.938.M4.5 Ministerial Statement 938 – Notification of potential non-compliance 2024.EMP.8b – File note of site inspection – Knox operations centre – 28 August 2024	C	C	<u>Weaber Plain</u> KAI has previously advised that a dedicated mobile chemical batching plant is used on site. This is a bunded plant that mitigates direct human exposure to chemicals. Farm chemical application machinery self-cleans in the field. It appears from site inspection on 22 April 2024 that some chemical decanting may occur on Lot 3. This is not a fully contained area, therefore the Goomig project was originally assessed as potentially non-compliant with EMP39. <u>Knox Creek Plain</u> It was evident at site inspection on 8 April 2024 that chemicals were being decanted, and possibly blended, outside fully contained areas. While irrigated cropping had not yet commenced in the Knox Creek Plain development area in 2024, the Knox project is assessed as potentially non-compliant with EMP because of the findings of the 8 April 2024 site inspection. Non-compliance was reported to DWER on 15 April 2024 (refer to 2024.938.M4.5). The non-compliance was rectified and confirmed by follow up inspection on 28 August 2024. Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant.
EMP 40	Develop emergency response procedures in accordance with Department of Water, Water Quality Protection Note <i>Contaminant spills – emergency response</i> (WQPN No. 10).	For determining the appropriate level of response according to the degree (or classification) of the spill.	Prior to commencement of planting of crops	-	PNC	PNC	The auditor did not see any evidence of emergency response procedures in the 2024 reporting period.
EMP 41	Dispose empty chemical containers in accordance with the AgSafe guidelines for disposal of containers.	To minimise potential for environmental impacts by minimising chemical residue in disposed chemical containers.	Ongoing from commencement of irrigation	2024.EMP.22a – File note of site inspection – Goomig – 22 April 2024	C	C	<u>Weaber Plain</u> KAI has previously advised that it uses the recycling program at the Ord River District Cooperative (ORDCO). Inspection on 22 April 2024 found empty containers set aside for reuse. <u>Knox Creek Plain</u> Keep Farming advised at inspection on 16 April 2025 that empty chemical containers are disposed of through the local government Drum Muster.

Chemical use monitoring regime

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 42	Inspection of permanent hydrocarbon storage facilities	Three monthly	All hydrocarbon storage devices comply with appropriate standards and/or regulations	Non-compliant hydrocarbon storage devices to be replaced/repared as appropriate.	2024.EMP.22a – File Note of site inspection – Goomig – 22 April 2024 2024.EMP.8a – File note of site inspection – Knox operations centre – 8 April 2024 2024.938.M4.5a Ministerial Statement 938 – Notification of potential non-compliance 2024.EMP.8b – File note of site inspection – Knox operations centre – 28 August 2024 2024.EMP.42 – Keep Farming inspection forms and reporting procedure	C	C	<u>Weaber Plain</u> DPIRD has not assessed whether KAI has been undertaking three-monthly inspections of its hydrocarbon storage facilities. However, KAI's hydrocarbon storage devices are compliant and, therefore, the target is met. Refer to photos 8 to 12 in 2024.EMP22). <u>Knox Creek Plain</u> Inspection of the Knox Development operations centre area on 8 April 2025 found improper storage and handling of hydrocarbons and other chemicals (2024.EMP8a). The non-compliance was reported to DWER on 15 April 2024 (2024.938.M4.5a). Follow up inspection on 28 August 2024 found that the non-compliances had been rectified (2024.EMP8b). Keep Farming also provided evidence of regular inspections being undertaken (2024.EMP42). Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant.

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 43	Survey vegetation in the Buffer Area for symptoms of damage typical of chemicals being used in the ORIA	Annually	No detectable impact on the buffer	- Investigate the cause. - Investigation opportunities to prevent re-occurrences. - Inform farm owners of outcomes of the survey. - In the event of chemical discharge contrary to <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>, report to DPW AND/OR DER.	2024.EMP.133 Buffer vegetation condition assessment 2024	C	C	A buffer vegetation condition assessment was undertaken in the Goomig and Knox buffer areas in June 2024. No damage from chemicals was recorded at the monitoring sites. However, there is evidence of some minor spray drift impacts, with symptoms of potential chemical damage observed at a small edge of the Goomig buffer adjacent to sprayed fields. The target of 'no detectable impact on the buffer' was not met in some locations, as identified by Western Environmental in June 2025. Albeit outside of the 2024 reporting period, the impact was likely in 2024 or earlier. Aerial spraying is undertaken in the Goomig and Knox farmlands. Under the Biosecurity and Agriculture Management (Aerial Application) Regulations 2018, operators are required to record, among other things, the date and time of application of controlled chemical products, estimated wind velocity and direction at the time of application. Accordingly, aerial spraying is regulated by separate legislation. DPIRD to request KAI and MG Corporation to review spray records and advise cause of the target not being met such as possible chemical application when wind velocity is too high. It must also be considered whether the target is achievable and reasonable in the context of aerial spraying methodology and the purpose of the buffer, which is to absorb some of the impacts of the agriculture and act as a buffer to the adjoining conversation parks. In this regard the buffer is fulling its purpose. DPIRD notes that the target of no detectable impact is not a threshold, and appropriate corrective actions will be undertaken for the identified spray drift in accordance with the purpose of the buffer.

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 44	Inspect storage facilities and mixing and washdown areas, and surrounds for chemical spills	Daily during spray operations Monthly at other times	No chemical spills	- Implement emergency response. - Classify appropriate response. - Notify authorities if High or Moderate incident impact classifications. - Review Emergency Response Plan (for High and Moderate incident impact classes). - Prepare and implement follow-up environmental monitoring (in consultation with DPW AND/OR DER and DoW as required).	2024.EMP.22a – File Note of site inspection – Goomig – 22 April 2024 2024.EMP.8a – File note of site inspection – Knox operations centre – 8 April 2024 2024.EMP.8b – File note of site inspection – Knox operations centre – 28 August 2024 2024.EMP.42 – Keep Farming inspection forms and reporting procedure	C	C	<u>Weaber Plain</u> Inspection of the Goomig operations area on Lot 3 on 22 April 2024 found no evidence of chemical spills. <u>Knox Creek Plain</u> Inspection of the Knox Development operations centre area on 8 April 2024 found improper storage and handling of hydrocarbons and other chemicals and some spills (2024.EMP8a). Follow up inspection on 28 August 2024 found that the non-compliances had been rectified (2024.EMP8b). Keep Farming also provided evidence of regular inspections being undertaken (2024.EMP42). Given the corrective actions and reinstatement of compliance in 2024, this item is recorded as compliant.

Dust and particulate management actions

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 45	Burning of vegetation will occur only at times when prevailing winds direct smoke and ash away from residential areas	To minimise the potential for smoke and ash to affect nearby residents	Ongoing from commencement of ground disturbance	Not applicable	C	C	This item is assessed as compliant as there are no residential areas nearby Goomig or Knox. There is workers accommodation at Goomig and Knox. Impacts on workers are for KAI and Keep Farming to manage.
EMP 46	Provide prospective farm owners/lessees documentation on practices to prevent dust emissions	To reduce the potential for dust generation by minimising ground disturbance	At time of sub-lease	A copy of the Knox Development Lease can be provided on request.	CLD	CLD	<u>Weaber Plain</u> This item was assessed as completed in a previous audit period. <u>Knox Creek Plain</u> The Knox Development Lease requires the Lessee to comply with the Knox Environmental Approvals, which include the Knox EMP.
EMP 47	Proponent shall notify the nearby residences of construction activities and the predicted nature and duration of proposed burning activities	To reduce the potential for community impact by ensuring effective communication	As required	Refer to EMP45 (not applicable)	C	C	Refer to EMP45
EMP 48	Cleared construction surfaces and stockpiles will be watered and/or stabilised where practicable to reduce dust lift-off	To reduce the potential for environmental and community impacts by reducing the potential for dust generation	During construction of shared infrastructure	-	CLD	-	<u>Weaber Plain</u> This item was assessed as completed in a previous compliance assessment period. <u>Knox Creek Plain</u> There is no shared infrastructure being constructed on Knox. There was no evidence of significant dust impacts to the environment outside the development area from multiple site visits to the Knox development area in 2024.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 49	Speed limits will be sign-posted and implemented in the project area and will reflect local conditions	To reduce the potential for environmental impacts by reducing the potential for dust generation	Ongoing from commencement of ground disturbance	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	C	C	Speed limits are not sign-posted in the Goomig development area. KAI has previously advised that speed limits are addressed at staff induction. Speed limits are sign-posted around the Knox operations centre (see Photo 1 in EMP2024.EMP2a) and now also addressed at induction. There was no evidence of significant dust impacts to the environment outside the development area from multiple visits to the Goomig and Knox development areas during 2024. Given the environmental outcomes are being met, the Goomig and Knox developments are assessed as compliant with this item.

Dust and particulate monitoring regime

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 50	Visual monitoring	Daily during construction of shared infrastructure	No offsite impact on amenity	- Investigate cause. - Implement additional dust control measures, as appropriate.	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025 2024.EMP.2b – Knox northern levee looking east 2024.EMP.2c – Knox northern levee looking west 2024.EMP.2d – Drone images (17 June 2024).	CLD	-	<u>Weaber Plain</u> This item as assessed as not required for the Goomig development because no shared infrastructure was constructed in 2024. <u>Knox Creek Plain</u> There is no shared infrastructure being constructed on Knox. There was no evidence of significant dust impacts to the environment outside the development area from multiple site visits by DPIRD to the Knox development area in 2024. In addition, there are no residential areas nearby the Knox Creek Plain development areas therefore no risk of impact to residential amenity.

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 51	Monitor community issues associated with dust/burning	During construction of shared infrastructure	No public complaints relating to dust generated by the project	Public complaints will be recorded and responded to in accordance with the Community Issues Management Sub-plan.	-	CLD	-	<u>Weaber Plain</u> This item was assessed as completed in a previous compliance assessment period. <u>Knox Creek Plain</u> There is no shared infrastructure being constructed on Knox. DPIRD understands no complaints have been received by Keep Farming regarding dust emissions or burning in 2024.

Weed, plant pathogen and pest animal management actions

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 52	Conduct a weed survey in the common user infrastructure areas and adjoining areas (up to 100 m) within the Weaber Plain Buffer Area to establish baseline information (i.e. weed species and density/cover/distribution of weeds) and identify Priority Areas for management and control. Priority Areas will be defined by: - weed infested areas (e.g. monocultures of neem trees, weed density/cover greater than 50%) - areas that have declared noxious weed species and Weeds of National Significance (WONS) - areas declared as local priority in consultation with DPW AND/OR DER and DAFWA	To provide data to inform management.	Prior to ground disturbance	Not applicable	CLD	-	<u>Weaber Plain</u> Item assessed as completed in 2012 (Strategen 2013b). Refer to Botanical North (2012a), and Botanical North (2012b). <u>Knox Creek Plain</u> Refer to KEMP 52

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
KEMP 52	Conduct a weed survey to establish baseline information (i.e. weed species and density/cover/distribution of weeds) and identify Priority Areas for management and control. Priority Areas will be defined by: - weed infested areas (e.g. monocultures of neem trees, weed density/cover greater than 50%) - areas that have declared noxious weed species and Weeds of National Significance (WONS) - areas declared as local priority in consultation with DPaW, DAFWA and Ord Land and Water Inc.	To provide data to inform management.	Prior to ground disturbance	Not applicable	-	CLD	Baseline weed survey was undertaken by Ord Land and Water in 2015. Refer to Ord Land and Water (2015) Knox Creek Weed and Vegetation Condition Assessment 2015, unpublished report. This item was assessed as complete at that time.
EMP 53	Establish permanent weed survey transects within 100 m into the Weaber Plain Buffer Area.	To ensure repeatability of ongoing weed monitoring.	Prior to ground disturbance	Refer to EMP54	C	C	DPIRD re-established the permanent weed transects within the Goomig and Knox buffer areas in September and October 2023.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 54	Conduct weed surveys along permanent weed survey transects (and opportunistically between permanent weed survey transects) to establish baseline information (i.e. weed species and density/cover/distribution of weeds) and identify and update Priority Areas for management and control. Priority Areas will be defined by: - weed infested areas (e.g. monocultures of neem trees, weed density/cover greater than 50%) - areas that have declared noxious weed species and Weeds of National Significance (WONS) - areas declared as local priority in consultation with DPW AND/OR DER, DAFWA and Ord Land and Water Inc.	To provide data to inform management.	Annually, from commencement of ground disturbance	2024.EMP.54a – Goomig Project – 2024 Weed Monitoring Program Report 2024.EMP.54b – Knox Project – 2024 Weed Monitoring Program Report 2024.EMP.54c – Goomig and Knox 2024 weed monitoring data	C	C	Weed surveys were conducted along permanent weed transects in September 2024.
EMP 55	Update the extent of Priority Areas which will be defined by: - weed infested areas (e.g. monocultures of neem trees, weed density/cover greater than 50%) - areas that have declared noxious weed species and Weeds of National Significance (WONS) - areas declared as local priority in consultation with DPW AND/OR DER, DAFWA and Ord Land and Water Inc.	To provide data to inform management.	Annually, from commencement of ground disturbance	2024.EMP.54a – Goomig Project – 2024 Weed Monitoring Program Report 2024.EMP.54b – Knox Project – 2024 Weed Monitoring Program Report	C	C	Priority areas for weed management are identified in the weed monitoring reports.

EMP 56	Develop and undertake a weed control program in Priority Areas, except roads.	To ensure effective control of weeds by the appropriate parties.	Prior to ground disturbance	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	C	C	<u>Weaber Plain</u> Goomig assessed as compliant given timing prior to ground disturbance and weed control undertaken in accordance with the 2013 Ord River Irrigation Area – Weaber Plain Development Project Phase 2 Weed Control Program (Strategen, 2013). The concept of a weed control program implies a sustained effort over time, with an outcome. The original 2013 Ord River Irrigation Area – Weaber Plain Development Project Phase 2 Weed Control Program (Strategen, 2013) shows 90% Parkinsonia in the old D8 swamp area. The extract below is the original priority weed area mapping from the 2013 Ord River Irrigation Area – Weaber Plain Development Project Phase 2 Weed Control Program (Strategen, 2013). When comparing the area identified as degraded (above) to the weed proportion (up to 90% Parkinsonia) in the image below, it is evident that sustained improvement has been observed due to years of weed control. Table 3 of the Phase 2 Weed Control Program stated targets of “No more than a 10% statistical increase in weed species density/cover/distribution compared to the results of initial weed survey” and “No new Priority Areas during construction and operation”. This has been achieved. <u>Knox Plain</u> KAI undertakes chemical control of Parkinsonia weed in the Goomig and Knox environmental buffer areas. Keep Farming understands from speaking to KAI that spraying of Parkinsonia was undertaken in May, September and October 2024 in the buffer areas north of the Knox and Goomig developments (2024.EMP.2a). There is no documented evidence of a weed control program or the location and extent of
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Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
							implementation of a program. More reliable evidence of compliance with this management action is required. This item is, therefore, recorded as potentially non-compliant. Despite the above, DPIRD notes from the Knox 2024 weed monitoring program that Parkinsonia was recorded at transects KCWT10 and KCWT9 only, where Parkinsonia was present pre-development. Parkinsonia has not spread to the southern transects, KCWT1 to KCWT7.
EMP 57	Implement an induction program for personnel which contains information on: - hygiene procedures for all vehicles, machinery and equipment upon entering and leaving the Weaber Plain Development Area and/or Priority Areas - specific soil management requirements in Priority Areas - requirement to remain within designated clearing areas.	To reduce the risk of construction activities introducing and/or spreading weeds and plant pathogens by ensuring construction personnel are aware of appropriate management measures and requirements.	Within one week of personnel commencing work on-site	Not assessed	CLD	PNC	<u>Weaber Plain</u> This item was assessed as completed in a previous reporting period given hygiene and soil management actions relate to the construction period and KAI is not currently constructing. Construction activities on Goomig are complete (except for deferred clearing Lots 3, 7 and 11) and Goomig is in its Operations phase. Accordingly, Goomig is assessed as completed. <u>Knox Creek Plain</u> DPIRD has no evidence of these inductions being undertaken in 2024. Senior DPIRD staff completed Keep Farming's environmental induction alongside Goomig-Knox Independent Review Group members (EPBC2010/5491) prior to a site visit on 10 April 2025. This involved a PowerPoint presentation and information package addressing health, safety and environmental requirements including the requirement not to enter buffer areas. There is no development or consequent soil disturbance in Priority Areas which are located within the buffer area.
EMP 58	Prepare guidelines for prospective farmers/lessees that contains information on: - vehicle hygiene measures (e.g. issues of using machinery from southern WA or interstate) - identification, control and reporting of weeds (e.g. weed	To reduce the risk of agricultural activities introducing and/or spreading weeds, plant pathogens and pest animals by ensuring farm owners/managers are aware of appropriate management measures and requirements.	At time of sub-lease	A copy of the Knox Development Lease can be provided on request.	CLD	CLD	<u>Weaber Plain</u> This item was assessed as completed in a previous audit/reporting period (refer to Strategen 2015). <u>Knox Creek Plain</u>

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
	control in tail water ditches, use of fire) • identification and reporting of pest animals, declared noxious weed species and signs of plant pathogens • obligations under the Agricultural and Related Resources Protection Act 1976 (WA) (including the requirement for the occupier of any private land to control declared plants and declared animals on and in relation to that land) • selection of pet animals (e.g. discourage cat ownership) • selection of crops (e.g. no declared noxious weed species) • irrigation and drainage of land (i.e. no water from farming allotments directed into the Weaber Plain Buffer Area).						The Knox Development Lease requires the Lessee to comply with the Knox Environmental Approvals, which include the Knox EMP.
EMP 59	Develop and supply an information package to prospective farm owners/lessees/managers within the project area that contains: • a weed identification key for all species known to occur in the area (key to be developed in consultation with DPW AND/OR DER, DAFWA and Ord Land and Water) • possible control techniques (information on controlling declared noxious weed species can be obtained from DAFWA [2003]) • general soil management and hygiene requirements for farms • reporting requirements.	To reduce the risk of agricultural activities introducing and/or spreading weeds, plant pathogens and pest animals by ensuring farm owners/managers are aware of appropriate management measures and requirements.	At time of sub-lease	Not applicable	CLD	N/A	<u>Weaber Plain</u> This item was assessed as completed in a previous audit period (refer to Strategen 2015). <u>Knox Creek Plain</u> Item not included in Knox EMP

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 60	Topsoil from areas with known declared weed species will be managed in accordance with DAFWA requirements.	To reduce the risk of declared weed species being introduced into/ spread throughout the Buffer Area.	During clearing of farm lots	Not applicable	NR	N/A	<u>Weaber Plain</u> There was no clearing and no topsoil removed from the Weaber Plain development area in 2024. <u>Knox Creek Plain</u> Item not included in Knox EMP
EMP 61	Aquatic weed control shall be undertaken consistent with industry standards	To reduce the risk of aquatic weeds being introduced into/ spread throughout natural watercourses and wetlands near the project area.	Ongoing from commencement of irrigation	2024.EMP.61 Photographic evidence of aquatic weed control - 6 January 2025	C	NR	Aquatic weed control is undertaken in the M2 irrigation channel.
EMP 62	Restrict movement of vehicles and machinery to the limits of the areas to be cleared (thus not affecting the Weaber Plain Buffer Area) by delineating the Weaber Plain Buffer Area (e.g. fence, flags and signs) prior to clearing.	To reduce the risk of weeds being introduced into/ spread throughout the Buffer Area by limiting access.	Ongoing from commencement of ground disturbance	-	NR	NR	<u>Weaber Plain</u> There was no clearing in the Weaber Plain development area in 2024. Lots 4, 7 and 11 remain uncleared. <u>Knox Creek Plain</u> No clearing was undertaken in the development area in 2024. Development boundaries were surveyed and marked prior to clearing in 2022 and 2023. Refer to previous compliance reports for more information.
EMP 63	Access into the Weaber Plain Buffer Area will be via designated access tracks only.	To reduce the risk of weeds being introduced into/ spread throughout the Buffer Area by limiting access.	Ongoing from commencement of ground disturbance	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	C	C	<u>Weaber Plain</u> DPIRD staff accompanied KAI on its annual bore monitoring run in September 2024. Access was via established designated tracks only. Weed and vegetation monitoring sites are accessible via established tracks. <u>Knox Creek Plain</u> No evidence of vehicle disturbance beyond established access tracks was observed during Know site inspection on 16 April 2025. DPIRD staff accompanied KAI on its annual bore monitoring run in September 2024. Access was via established designated tracks only. Weed and vegetation monitoring sites are accessible via established tracks.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 64	Establish clean down site/s at access points to the Weaber Plain Buffer Area, rehabilitation areas (outside of the Buffer Area) and Priority Areas. The clean down site/s will be designed to ensure soil is collected and disposed of in a manner that does not allow the introduction or spread of weeds or plant pathogens. At each permanent clean down site there will be a sign describing the hygiene procedure/s required to be implemented.	To prevent the introduction/ spread of weeds and plant pathogens in the Weaber Plain Buffer Area, rehabilitation areas and Priority Areas.	During construction of shared infrastructure	Not applicable	CLD	N/A	<u>Weaber Plain</u> This item was assessed as completed in a previous audit period. <u>Knox Creek Plain</u> Item not included in Knox EMP.
EMP 65	Clean down all machinery entering the Weaber Plain Development Area to remove vegetative matter, seeds and soil.	To prevent the introduction/ spread of weeds and plant pathogens in the project area.	During construction of shared infrastructure	Not applicable	CLD	-	<u>Weaber Plain</u> Construction of shared infrastructure in the Weaber Plain Development area was completed in a previous audit period.
KEMP 65	Clean down all large machinery entering the Knox Creek Plain Development Area for the first time, to remove vegetative matter, seeds and soil. Each vehicle will be given a 'hygiene sticker' indicating that they have been checked and assessed for hygiene performance.	To prevent the introduction/ spread of weeds and plant pathogens in the project	During construction of shared infrastructure	2024.KEMP.65 – Notices of Intent (NOI) of intent to import subject to permit	-	C	<u>Knox Creek Plain</u> Refer to evidence item 2024.KEMP.65.
EMP 66	Undertake a vehicle hygiene check for all vehicles/machinery entering the construction site for the first time. Each vehicle will be given a 'hygiene sticker' indicating that they have been checked and assessed for hygiene performance.	To prevent the introduction/ spread of weeds and plant pathogens in the project area.	During construction of shared infrastructure	Not applicable	CLD	N/A	<u>Weaber Plain</u> Construction of shared infrastructure in the Weaber Plain Development area was completed in a previous compliance assessment period. <u>Knox Creek Plain</u> Item not included in Knox EMP

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 67	Record in a hygiene logbook (located at all clean-down sites) the: - time and date of clean down of machinery/ vehicle/equipment - method of cleaning machinery and vehicles - signature of the driver (and vehicle hygiene inspector if first inspection).	To provide hygiene data to inform management.	During construction of shared infrastructure	Not applicable	CLD	N/A	<u>Weaber Plain</u> Construction of shared infrastructure in the Weaber Plain Development area was completed in a previous audit period. <u>Knox Creek Plain</u> Item not included in Knox EMP
EMP 68	Certify all soil and fill material sourced from outside the project area as disease and weed free in accordance with DAFWA and DPW AND/OR DER requirements. If certificates cannot be obtained a risk assessment will be carried out on the soil material and only material that is evaluated as a very low risk of having environmental or declared noxious weeds or plant pathogens will be permitted for use.	To prevent the introduction/ spread of weeds and plant pathogens in the project area.	Ongoing from commencement of ground disturbance	2024.EMP.68a – Area 11 extraction area – 13 November 2024 Photo 2024.EMP.68b - Keep Farming Area 11 Weed Risk Assessment EMP 68	C	C	<u>Weaber Plain</u> KAI advised DPIRD that no soil material was imported into Goomig in 2024. <u>Knox Creek Plain</u> Materials were extracted from the Area 11 raw materials extraction area during the compliance assessment period for use in construction of the Knox Development. No materials are imported from outside of the Knox and adjacent Weaber (Goomig) development areas. Area 11 (Goomig) material is considered low risk due to the proximity of the borrow pit. Baseline weed survey of the Goomig Project buffer areas was undertaken by Botanical North in 2012 and did not record any weeds in the Area 11 area. Area 11 is accessed by one road in and out minimising risk of spread of weeds. DPIRD found no evidence of weeds in the main southern extraction area materials stockpile during inspection on 13 November 2024 (2024.EMP68a). There are weeds present in the vegetation surrounding the extraction area and some weed growth on old material stockpiles in the Area 11 central extraction area. This presents a risk of spread of weeds from ongoing use of area. It is unknown whether the central or northern extraction areas were used in the compliance period and, if so, whether weeds were cleared and controlled as per EMP 69. Area 11 is within the MS938 project area. Accordingly, this item is assessed as compliant. Keep Farming provided its Area 11 Weed Risk Assessment (2024.EMP68b).

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 69	Inspect borrow pits and borrow pit access tracks prior to disturbance to ensure weed species are not present. If any weeds are present, they will be cleared and controlled (e.g. physical removal, spray, disposal off-site, burning) from the affected areas prior to commencement of borrow extraction.	To prevent the introduction/ spread of weeds and plant pathogens in the project area.	Prior to ground disturbance	2024.EMP.68a – Area 11 extraction area – 13 November 2024 Photo 2024.EMP.68b - Keep Farming Area 11 Weed Risk Assessment EMP 68	C	C	Refer to EMP 68 above for reasoning regarding compliance status. Although some weeds were present in the vegetation surrounding the extraction area and some weed growth on old material stockpiles in the Area 11 central extraction area, this item is assessed as compliant based on the timing of prior to ground disturbance. No new areas of ground in Area 11 were disturbed in 2024. Weed free material was extracted from existing disturbed (extraction) areas. The Area 11 borrow pit/stockpile is in the Goomig buffer and was used for the Knox Development.
EMP 70	Rehabilitate disturbed areas that are not to be utilised post-construction in accordance with the Rehabilitation Management Sub-plan.	To re-establish native vegetation and reduce and control weed cover.	During construction of shared infrastructure	Refer to EMP 134 to 165	CLD	-	<u>Weaber Plain</u> As noted by the previous auditor (KBC 2022), rehabilitation activities were completed by Leighton Contractors or others for LandCorp at the completion of construction (~2012-14). This includes the construction compound area in the Weaber Plain buffer area adjacent to Moonamang Road and other rehabilitation sites located to the east of Wooljim Lane. Refer to EMP 134 to 165 regarding rehabilitation management actions and monitoring regime. <u>Knox Creek Plain</u> There is no shared infrastructure being constructed on Knox. There are no construction disturbance areas requiring rehabilitation. All laydown and other areas associated with infrastructure construction are within the permanent development area. Future proposed borrow pit in the Knox environmental buffer areas will require rehabilitation.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 71	Ensure that waste that may attract pest animals is properly disposed of in as far as is practicable.	To prevent the encouragement of pest animals by ensuring effective waste disposal.	Ongoing from commencement of ground disturbance	2024.EMP.22a – File Note of site inspection – Goomig – 22 April 2024 2024.EMP.8a – File note of site inspection – Knox operations centre – 8 April 2024 2024.938.M4.5a Ministerial Statement 938 – Notification of potential non-compliance 2024.EMP.8b – File note of site inspection – Knox operations centre – 28 August 2024 2024.EMP.71 – Request for information (RFI) response – 3 September 2024	C	C	<u>Weaber Plain</u> Photo 1 within 2024.EMP22 shows proper disposal of waste in a covered bin at the Goomig operations area. <u>Knox Creek Plain</u> Inspection of the Knox operations centre on 8 April 2024 found a landfill onsite (2024.EMP8a). The non-compliance was reported to DWER on 15 April 2024 (2024.938.M4.5a). Follow up inspection on 28 August 2024 found that the waste had been removed (2024.EMP8b). Results of soil samples collected from the site were provided to DWER (2024.EMP71). This item is recorded as compliant given compliance was reinstated in 2024.

EMP 72	Undertake pest eradication program within Buffer Area.	To reduce the risk of pest animals becoming established within the Buffer Area.	Ongoing from commencement of ground disturbance	2024.EMP.72a – Goomig buffer mustering activities 2024 2024.EMP.72b – Cattle in buffer area 2024.EMP.72c – Pig diggings NWG buffer 2024.EMP.72d – Survey data from 2024-2025 wet season monitoring program	C	C	<u>Weaber Plain</u> KAI provided evidence of mustering (destocking) activities in the Goomig buffer area in 2024 (2024.EMP72a). The following was advised: <i>13/4/24 - around 120 head removed</i> <i>2/8/24 there was Pannel yards run around all buffer zone to remove clean skin cattle as well 30 head removed 26/9/24 around 60 head removed'</i> However, DPIRD observed cattle in the Goomig buffer area while conducting vegetation condition assessments the week of 3 June 2024, in the north-west section of the Goomig buffer. DPIRD requested KAI to destock as soon as possible and ensure the gate to Carlton Hill Station remains closed (2024.EMP72a). Biota (2025) found that cattle activity in Gouldian Finch grass survey plots had increased to more than 50% (refer to Item 10 of Gouldian Finch Conservation Plan implementation – Table 3 Monitoring regime, targets and corrective actions). Evidence of pigs were observed in the north-west area of the Goomig buffer (2024.EMP71c). Although a formal pest eradication program with the purpose to reduce the risk of pest animals becoming established within the Buffer Area was not in place during the 2024 reporting period, this item is assessed as compliant given suitable corrective actions were implemented. These include investigating the causes, mustering and de-stocking. DPIRD considers that the sustained mustering effort over the past 15 years, has continued and is effective, with annual mustering undertaken in conjunction with the managers of Carlton Hill Station. The de-stocking 'program' is long term and sustained and considered highly effective based on both frequency and thoroughness. <u>Knox Creek Plain</u> Keep Farming advised during interview prior to site inspection on 16 April 2025 that KAI undertook destocking of the Knox and Goomig buffer areas in April and May 2024. No cattle were observed during the site inspection on 16 April 2025.
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Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
							Keep Farming further advised that mustering of cattle from the development area and buffer area is an ongoing undertaking in consultation with adjacent pastoral lease holders (Carlton Plain and Legune). Pastoral station management are called as required for mustering purposes. Habitat condition assessment at monitoring sites within the buffer area found habitat to be in Good to Very Good condition and low grazing impact across all monitoring sites (2024.EMP71d). Buffer fencing had not yet been established by the conclusion of the 2024 compliance reporting period. The revised Knox FPDP dated September 2025 includes a buffer fencing plan. Buffer fencing will assist in keeping stock out of the buffer area. Keep Farming cannot eradicate cattle in the buffer since it has no authority (tenure) to manage pests such as pigs or cats in buffer areas.
EMP 73	Install signs at the entry point to any access tracks in the Weaber Plain Buffer Area to discourage people from entering the area.	To reduce the risk of feral cats and dogs becoming established in the Buffer Area.	Prior to commencement of planting of crops	Refer to EMP13	C	C	Refer to EMP13
EMP 74	Ensure stock are removed from the Buffer Area.	To remove stock as an ongoing source of land degradation and a vector for introducing and spreading weeds throughout the Buffer Area.	Ongoing from commencement of ground disturbance	Refer to EMP72	C	C	Refer to EMP72. DPIRD monitors cattle de-stocking and is satisfied it is conducted at best possible practice. Evidence of the corrective actions has been provided to DPIRD and the regulators. KAI provided evidence of mustering (destocking) activities in the Goomig buffer area in 2024. The purpose of the item was achieved by implementing the corrective actions (destocking, and investigating the cause by closing the gate).

Weed, plant pathogen and pest animal monitoring regime

Item	Activity and location	Frequency*	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 75	Weed species found along permanent weed survey transects in the buffer	Annually	No new plant pathogens or weed species observed or recorded in the mapped area during construction. No new Priority Areas during construction.	- Map the extent of any new Priority Areas. - Map the distribution of the newly introduced species. - Identify activities that may have potentially introduced the species. - Plan and implement a monitoring or control treatment program. - Re-educate contractors/farm owners/managers of the importance of hygiene control measures.	2024.EMP.54a – Goomig Project – 2024 Weed Monitoring Program Report 2024.EMP.54b – Knox Project – 2024 Weed Monitoring Program Report 2024.EMP.54c – Goomig and Knox 2024 weed monitoring data	C	C	<u>Weaber Plain</u> Annual survey of weed transects was undertaken in October 2024 (2024.EMP54a). The 2024 survey recorded seven weed species, including species sighted off-transect: <i>Parkinsonia aculeata</i> <i>Sida acuta</i> <i>Stylosanthes scabra</i> (Vogel) <i>Calotropis procera</i> <i>Vachellia farnesiana</i> <i>Hyptis suaveolens</i> <i>Passiflora foetida</i> It is unclear how many species were recorded at baseline, although five are mentioned in the report (Botanical North 2012): <i>Parkinsonia aculeata</i> <i>Sida</i> species <i>Hyptis suaveolens</i> <i>Passiflora foetida</i> Sicklepod This item is assessed as compliant because annual survey of weed transects was completed. It is not possible to determine whether the target has been met given the ambiguity of the baseline weed survey results as reported in Botanical North (2012). <u>Knox Creek Plain</u> Annual survey of weed transects was undertaken in October 2024 (2024.EMP.54b). The 2024 survey recorded the same species as recorded at baseline: <i>Parkinsonia aculeata</i> <i>Hyptis suaveolens</i> <i>Sida cordifolia</i> <i>Vachellia farnesiana</i> This item is assessed as compliant as no new weed species were recorded.

Item	Activity and location	Frequency*	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 76	Density/cover/distribution of weed species in the permanent weed survey transects and common use infrastructure areas.	Annually	No more than a 10% statistical increase in weed species density/cover/distribution compared to the results of initial weed survey. No new Priority Areas	- Map the extent of any new Priority Areas. - Map the revised extent of the specific weed species within the site. - Identify activities that may have potentially spread the weed species. - Plan and implement a weed control treatment program. - Apply hygiene control and education measures.	Refer to EMP 75	C	C	<u>Weaber Plain</u> This item is assessed as compliant because annual survey of weed transects was completed. However, it is not possible to determine whether the target has been met given the baseline survey report (Botanical North 2012) does not include this data. <u>Knox Creek Plain</u> This item is assessed as compliant because annual survey of weed transects was completed. However, it is not possible to determine whether the target has been met as the baseline survey report does not include any data on weed species density, cover or distribution at the weed transect sites.
EMP 77	Presence of declared weeds in farm lots.	As required	No declared weed species present.	- Notify DAFWA if required. - Investigate cause. - Undertake weed control in accordance with DAFWA requirements. - Monitor success of weed control.	-	PNC	C	<u>Weaber Plain</u> KAI advised DPIRD that there are no declared weeds on KAI-managed farm lots. KAI explained that declared weeds presence would be detrimental to the cropping program, so there is a commercial imperative to manage weeds on farm. There are potentially declared weed species present on the cleared and undeveloped Goomig Lot 15 owned by MG Corporation, therefore this item is assessed as potentially non-compliant. <u>Knox Creek Plain</u> Keep Farming advised that monitoring for declared weeds is undertaken weekly on farm and reporting of observed weeds of national environmental significance is included in staff inductions.
EMP 78	Feral animals (including stock) in the buffer area	As required	No new pest animals or sightings of feral animals	- Investigate cause. - Undertake eradication program as required. - Undertake intervention or remediation works (e.g. reduce bins, trapping, re-education).	Refer to EMP72	C	C	Refer EMP72 and to Table 6 This has been assessed as compliant due to one opportunistic sighting of pig diggings (no pigs themselves) was observed in the buffer and there were sightings of stock. There was no other evidence of pest animals in the buffer area. Monitoring of feral animals (stock) was undertaken and destocking (a corrective action) occurred.

Surface water management actions

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 79	Induct personnel on surface water management measures, including: - M2 channel may receive effluent from the Kununurra Wastewater Treatment Plant - the potential risks from <i>Burkholderia pseudomallei</i>, which is found dormant in soils and the potential for its dispersion through irrigation processes.	To reduce the potential for activities to adversely affect surface water values by ensuring construction personnel are aware of appropriate management measures.	Within one week of personnel commencing work on-site	-	CLD	-	<u>Weaber Plain</u> This item was assessed as completed in a previous reporting period.
KEMP 79	Induct personnel on surface water management measures.	To reduce the potential for activities to adversely affect surface water values by ensuring construction personnel are aware of appropriate management measures.	Within one week of personnel commencing work on-site	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025 2024.EMP.2b – Knox northern levee looking east 2024.EMP.2c – Knox northern levee looking west 2024.EMP2d – Drone images (17 June 2024).	-	C	<u>Knox Creek Plain</u> DPIRD has no evidence of <u>construction</u> personnel inductions on surface water management measures being undertaken in 2024. Despite this, DPIRD found no evidence of significant erosion associated with construction activities. Refer to the evidence provided in relation to EMP 2 in relation to soil erosion control management measures. This item is assessed as compliant on this basis.
EMP 80	Construct levees at the perimeter of farmland adjacent to Border Creek to protect them from 1 in 20-year ARI flooding.	To protect farmland, prevent sedimentation of farm soil in Border Creek or the Keep River system.	Prior to commencement of planting of crops	2024.EMP.2b – Knox northern levee looking east 2024.EMP2c – Knox northern levee looking west	CLD	C	<u>Weaber Plain</u> Item assessed as completed in a previous compliance period. <u>Knox Creek Plain</u> Levees have been constructed on the northern perimeter of the Knox farmland adjacent Border Creek. Refer to the photos provided as evidence (2024.EMP2b and 2c).

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 81	Locate all drains on less permeable soils to minimise seepage to groundwater where possible. Where deeper drains are required, the excavated surface of the drain will be compacted to reduce seepage.	To reduce accessions to groundwater.	Prior to commencement of planting of crops	-	CLD	Not assessed	<u>Weaber Plain</u> Item assessed as completed in a previous audit period. Drains are sited in accordance with the approved Weaber Plain Phase 2 FPDP (Strategen 2011). <u>Knox Creek Plain</u> DPIRD has no evidence to assess compliance with this item. KAI advised in previous audit interviews that this requirement is achieved through consideration of data from test holes and the utilisation of experienced personnel.

Surface water monitoring regime

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 82	Inspect areas along the banks of channels, watercourses and drainage devices downstream and adjacent to the project area for evidence of erosion.	Ongoing from commencement of ground disturbance	No exposed surfaces outside the channel from which erosion could occur	- Investigate cause. - Implement erosion protection measures, such rock armouring or application of hydromulch to areas identified. - Monitor the effectiveness of remedy.	2024.EMP.82 – Erosion protection at stormwater outlet to Border Creek 2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	C	C	<u>Weaber Plain</u> Channels and drains are inspected annually as part of the CALIM audit. There is one stormwater drainage discharge point from the Goomig development area. Rock armour has been installed downstream of the discharge point (2024.EMP82a). <u>Knox Creek Plain</u> Refer to the file note of site inspection of 16 April 2025 (2024.EMP2a – photos 33, 34, 38 and 39).

Groundwater management and monitoring actions

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 83	Expand the groundwater monitoring bore network to include: - at least 20 'high intensity' regional bores - at least 30 'low intensity' regional bores. Regional bore locations shown in Appendix 3	To allow the collection of baseline and ongoing groundwater data to guide management.	Install prior to commencement of clearing of farm lots and at least 18 months before the commencement of irrigation.	Item assessed as completed in previous auditing period	CLD	-	<u>Weaber Plain</u> This item was assessed as completed in a previous reporting period, however, the Goomig reference bores on the Knox Creek Plain have become redundant with the development of the Knox Creek Plain. This issue needs to be resolved through the identification and confirmation of alternative reference bore sites in consultation with the IRG. DPIRD is meeting with Keep Farming in April and June 2026 to discuss new locations for replacement reference bore sites on Knox. Refer to KEMP 83 below.
KEMP 83	Expand the groundwater monitoring bore network to include: 'high intensity' regional bores (i.e. auto loggers installed) 'low intensity' regional bores (i.e. no auto loggers installed but monitored manually).	To allow the collection of baseline and ongoing groundwater data to guide management.	Install prior to commencement of clearing of farm lots, a minimum of 18 months prior to irrigation.	Not applicable (refer to comments)	-	PNC	<u>Knox Creek Plain</u> This is an historical PNC carried forward from DPIRD (2023 Annual Report) as the timing is 18 months prior to irrigation. The Knox bore monitoring network was expanded (additional to the Goomig network) from 2015, with annual monitoring since that time. Groundwater bores on the Knox Creek Plain have been monitored over the course of years including in the capacity of some of these bores as Goomig reference bores. The Knox groundwater monitoring network requires confirmation in consultation with the Goomig-Knox Independent Review Group that operates under EPBC 2010/5491 and EPBC 2010/7143. Until then, this item is assessed as potentially non-compliant. Keep Farming notes that (KAI 2025, p.37): 'The Knox bore network was expanded post-EPBC approval with the identification and annual monitoring of regional and Knox-located bores which were additional to the original Goomig bore network. The monitoring results have been included with EPBC and Statement 938 reporting since that time and provided to the Independent Review Group (IRG). - A review of the Knox bore network commenced in 2024. Recommended new bore locations for farm and reference bores on the Knox Plain have been provided to DPIRD in the FDDP (March 2025).

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
							Knox bores have been monitored annually since 2015 and continue to be monitored. New bores are planned for installation.' Loggers are proposed for new bores; the proposed locations of which are currently under review and will be discussed with DPIRD at scheduled meetings in April and June 2026, and then confirmed through consultation with the IRG.
EMP 84	Undertake monitoring of the parameters determined under Item 2 in bores established under Item 1 [EMP 83].	To collect baseline and ongoing groundwater data to determine any adverse effects to the receiving environment as a result of the Proposal.	Commencing 18 months prior to commencement of irrigation. High intensity bores: - groundwater levels and - temperature (automatic, daily) - EC, pH, TDS, major cations and anions, nutrients, and pesticides seasonally. Low intensity bores: - groundwater levels, EC, pH, TDS, nutrients and - pesticides seasonally.	2024.EMP.84 – Field data and manual depth – Sept-Oct 2024 Laboratory Certificates of Analysis can be provided on request.	C	-	Bores 11CS10RD, 11CS10RS, 11WP51S, 11WP4R, and 11WP53S were reinstalled in May 2024. Three of these bores are high intensity monitoring bores. The annual monitoring program was undertaken between 25 September and 7 October 2024. The program collected the following data from high and low intensity bores: - Groundwater levels including logger data acquisition and manual depth measurements, - Field temperature, EC, TDS, salinity, pH and turbidity, - Laboratory EC, TN, TP, TSS, and pesticides in select bores. Three Goomig reference bores (KC13, KC3 and KC3A) located on the Knox Creek Plain were recorded destroyed. Loggers were missing from bores 11WP56D and 10WP33 and the battery to the logger at KC3PB was flat. Groundwater monitoring was also undertaken in May 2024 to address data gaps from the previous September 2023 groundwater monitoring program including alkalinity, major cations and anions, and metals in high intensity bores.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
KEMP 84	Undertake monitoring of the parameters below for bores established under Item 1 [KEMP 83] High intensity bores: - groundwater levels and temperature (automatic, daily) - EC, pH, TDS, nutrients and pesticides seasonally Low intensity bores: - Groundwater levels, EC, pH, TDS, nutrients, and pesticides seasonally	To collect baseline and ongoing groundwater data to determine any adverse effects to the receiving environment from the Proposal.	Commencing 18 months prior to commencement of irrigation.	2024.EMP.84 – Field data and manual depth – Sept-Oct 2024	-	C	Refer to evidence.
EMP 85	Undertake monitoring of the chemical and nutrient parameters determined by DWER licence conditions in bores established under Item 1	To collect baseline and ongoing groundwater data.	Annually at commencement of dry season commencing 12 months prior to operation of irrigation infrastructure.	-	N/A	N/A	<u>Weaber Plain</u> A RIWI Act licence is not required for monitoring bores. Stategen (2015) auditors recommended deletion of this action. This recommendation is retained. <u>Knox Creek Plain</u> Item not included in Knox EMP
EMP 86	Expand the groundwater monitoring bore network with the establishment of at least one 'on-farm' bore per farm.	To allow the collection of baseline and ongoing groundwater data to inform management.	Install after clearing of farm lots but prior to commencement of irrigation.	Bennett et al. (2019)	N/A	C	<u>Weaber Plain</u> At its meeting on 27 February 2020, the IRG accepted the recommendations of Bennett et al. (2019) including that (p.22): 'We do not believe that the installation and monitoring of the extra "farm bores", as proposed in the EPBC conditions (at the time when it was envisaged that there could be multiple land managers within the Goomig Farmlands), is required or necessary.'
EMP 87	Determine sampling parameters for 'on farm' bores in consultation with the IRG including: - groundwater levels - EC - pH	To inform management.	Prior to commencement of irrigation and annually after the commencement of irrigation.	N/A	N/A	-	<u>Weaber Plain</u> Refer to EMP 86

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
KEMP 87	Determine sampling parameters for 'on farm' bores including: - groundwater levels - EC - pH	To inform management.	Prior to commencement of irrigation and annually after the commencement of irrigation.	2024.EMP.84 – Field data and manual depth – Sept-Oct 2024	-	C	<u>Knox Creek Plain</u> Groundwater bores on the Knox Creek Plain have been monitored for years prior to the commencement of irrigation including groundwater levels, EC, pH, nutrients and other parameters consistent with Goomig. The groundwater monitoring bore network and program going forward requires resolution now that development and irrigation has substantially commenced on the Knox Creek Plain,
EMP 88	Undertake monitoring of the bores established under [EMP 86] for physical, chemical, and nutrient parameters as determined by DWER licence conditions if regional bore ground water quality exceeds triggers.	To increase the monitoring spatial intensity to help determine location and reasons for exceedance. To assist with development of appropriate contingency action.	Annually at commencement of dry season once trigger has been exceeded.	N/A	N/A	N/A	Refer to EMP85 and EMP86
EMP 89	Maintain a database of groundwater levels and groundwater quality data based on monitoring results.	To provide data to inform management. To be used in combination with high and low intensity bores where exceedances of triggers are defined.	Ongoing – database to be updated at least every six months with the database to be established prior to June 2013.	A copy of the databases can be provided on request. 2024.EMP.89 - Bell et al (2025)	C	C	DPIRD maintains master databases of groundwater level and quality data. A copy of the databases can be provided on request. DPIRD completed a detailed groundwater data review in 2024 (Bell et al, 2025).
EMP 90	Establish and maintain a database of groundwater chemical and nutrient parameters.	To provide data to inform management.	Ongoing – database to be updated annually.	2024.EMP.89 - Bell et al (2025) A copy of the databases can be provided on request.	C	C	Refer to EMP89

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 91	Update groundwater model and operation of groundwater management system with monitoring data derived from Item 2, 7 and 8 in consultation with the IRG .	To assist in determining an optimal dewatering strategy and to forecast potential breaches of trigger values within a ten-year period.	Prior to commencement of irrigation and subsequently every 2–4 years depending on monitoring trends. If worst case scenario indicated a breach in trigger levels, modelling must be updated every two years.	Refer to Tenders WA https://www.tenders.wa.gov.au/watenders/index.do Tender Ref: DPIRD2025101 – Weaber Plain-Goomig groundwater modelling project.	NC	-	The groundwater model has not been updated since the commencement of irrigation, which is inconsistent with the requirement that the groundwater model be updated every 2 to 4 years depending on monitoring trends. Recent previous compliance reports have recorded potential non-compliance with this item given the IRG's endorsement, on 27 February 2020, of Bennett et al's (2019) recommendation that: <i>...as the modelling schedule was predicated on clearing and development occurring at a faster rate, and the modelled response was forecast to be greater than to that observed, we consider a change in Condition 12E is also warranted. The modelling update should also follow the next water level and chemistry review – such that at least another four years of water level data and two more comprehensive chemistry samples (from high intensity bores) and two more selective chemistry samples (from low intensity bores) can be collected and analysed.</i> However, this item is now assessed as non-compliant given trigger criteria have been exceeded. DPIRD awarded a contract to a hydrogeological consultant on 20 November 2025 to undertake the Weaber Plain-Goomig groundwater modelling project. Progress will be reported in the 2025 compliance assessment report. DPIRD completed a detailed groundwater data review in 2024 (Bell et al, 2025), which will inform the Goomig groundwater modelling project.
KEMP 91	Update groundwater model and operation of groundwater management system with monitoring data.	To assist in determining an optimal dewatering strategy and to forecast potential breaches of trigger values within a ten-year period.	Prior to commencement of irrigation and subsequently every 2–4 years depending on monitoring trends. If worst case scenario indicated a breach in trigger levels, modelling must be updated every two years.	-	-	NR	Irrigation on the Knox Creek Plain had not yet commenced in 2024. The original groundwater model for Knox was prepared by Cymod Systems in 2014, meeting the 'prior to the commencement of irrigation' requirement of this action.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 92	Define the conditions at which various irrigation methods can be utilised for the leased farms on the Weaber Plain development, based on the outcomes of future modelling undertaken.	To maximise water use efficiency and minimise potential environmental impacts of shallow groundwater levels by managing irrigated agriculture and/or cropping systems where required, e.g. on leased farms.	Review every five years in association with modelling from the commencement of irrigation.	Not applicable	NR	-	<u>Weaber Plain</u> To be determined following the outcomes of future modelling.
KEMP 92	Define the conditions at which various irrigation methods can be utilised for the Knox Creek Plain farms, based on the outcomes of modelling undertaken.	To maximise water use efficiency and minimise potential environmental impacts of shallow groundwater levels by managing irrigated agriculture and/or cropping systems where required, e.g. on leased farms.	Review every five years in association with modelling from the commencement of irrigation.	Not applicable	-	NR	<u>Knox Creek Plain</u> To be determined following the outcomes of future modelling.
EMP 93	Adopt ANZECC guidelines trigger values for a 'high conservation/ecological value system' for three years then adopt appropriate site-specific trigger levels for chemicals and nutrients in accordance with ANZECC & ARMCANZ guidelines (2000).	To ensure monitoring and management responses relate to appropriate trigger levels.	For the initial three years, after which site-specific triggers will be adopted.	2024.EMP.93a Keep River 2023-2024 Water Quality Monitoring and Management Report 2024.EMP.93b DRAFT Keep River 2024-2025 Water Quality Monitoring and Management Report	C	-	<u>Weaber Plain</u> PC99 ² default guidelines values have been adopted for toxicants. PC99 is the concentration protective of 99% of species. This protective concentration is applicable to high conservation/ecological values systems (ANZG 2018). The approved SGDMP under EPBC 2010/5491 adopts PC99 (termed 99% ANZECC in the SGDMP) as an 'early detection indicator'. Site specific guideline values have been adopted for physicochemical stressors, including nutrients. These values were derived from the baseline water quality monitoring program data (Bennett and George 2014) and endorsed by the IRG at its meeting on 3 December 2014. The 2023-2024 and 2024-2025 Keep River Water Quality Monitoring and Management Reports are provided as evidence of adoption of these trigger values.

² **protective concentration (PC)** the concentration of a substance that is predicted to protect a specified percentage of species from adverse effects (Australian & New Zealand Guidelines for Fresh & Marine Water Quality (ANZG) 2018). The approved Surface and Groundwater Discharge Management Plan (EPBC 2010/5491) applies PC99 as an 'early detection indicator'. This protective concentration is applicable to **high conservation/ecological values systems**.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
KEMP 93	Adopt water quality trigger values established under the requirements of EPBC Approval 2010/5491	To ensure monitoring and management responses relate to appropriate trigger levels.	Ongoing	2024.EMP.93a Keep River 2023-2024 Water Quality Monitoring and Management Report 2024.EMP.93b DRAFT Keep River 2024-2025 Water Quality Monitoring and Management Report	-	C	<u>Knox Creek Plain</u> Refer to EMP 93

Groundwater contingency actions

Item	Trigger	Corrective action	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 94	Groundwater levels, soil salinity and quality exceed or are likely to exceed trigger levels	- Investigate cause. - Implement actions consistent with Groundwater Management Plan Appendix 3 (e.g. modify land use/irrigation strategies, groundwater extraction). - Document changes in Annual Environmental Report (AER).	Refer Groundwater Management Plan Appendix 3	2024.EMP.89 - Bell et al. (2025) Refer to Tenders WA https://www.tenders.wa.gov.au/watenders/index.do Tender Ref: DPIRD2025101 – Weaber Plain-Goomig groundwater modelling project.	NC	Not assessed	<u>Weaber Plain</u> DPIRD completed a detailed review of groundwater data in 2024 (Bell et al. 2025). This review found that water level triggers have been exceeded at some monitoring sites, in conjunction with exceedance of soil salinity criteria from samples collected from adjacent farm lots; and that water salinity triggers have been exceeded at three sites. Refer to Bell et al. 2025 which contains a summary of trigger levels for monitoring bores and evidence that the causes have been investigated. DWER was notified of a potential non-compliance with the Groundwater Management Sub-Plan by letter dated 13 December 2024 attaching a copy of the draft Goomig groundwater review report (Bell et al.2025). It was noted in the same letter that the M2 irrigation water supply channel may be leaking more than the EMP-noted engineering design of seepage rates to less than 2 mm/day. DPIRD commenced M2 channel leakage investigations in collaboration with the Water Corporation in 2025. DPIRD awarded a contract to a hydrogeological consultant in November 2025 to undertake the Weaber Plain-Goomig groundwater modelling project which will review the causes for the onset of shallow water tables and the need for, and impact of, dewatering. The targeted groundwater model currently being prepared by Nullspace Technologies (conceptual model to be delivered May 2026) will inform updated corrective actions relating to groundwater levels. <u>Knox Creek Plain</u> The Knox EMP does not identify trigger criteria for groundwater levels, soil salinity or water quality, therefore, compliance with this item has not been assessed for the Knox Creek Plain. Criteria need to be identified and confirmed to monitor changes and risk, and to trigger timely response actions.

Item	Trigger	Corrective action	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 95	Levels of chemicals and nutrients exceed scenarios that show: - an increasing trend in the concentration of any chemical (at statistical confidence levels) - an exceedance of the site-specific triggers for a particular chemical over two consecutive years.	- Implement Item 8 and 9 (Table 14) to better map the distribution of groundwater exceeding target levels. - Investigate cause. - In consultation with the IRG, identify remedial action required, which could include the modification of irrigation and agricultural practices, reducing or ceasing the use of fertiliser and/or chemicals, groundwater abstraction or a combination of these measures. - Implement remedial action immediately after trigger levels are exceeded or, in consultation with the IRG, at an appropriate time. - Monitor success of remedy quarterly for 12 months or, following consultation with the IRG and in accordance with the advice from the IRG. - Document changes in Annual Environmental Report (AER).	Refer Groundwater Management Plan Appendix 3	2024.EMP.89 - Bell et al. (2025)	C	NR	<u>Weaber Plain</u> Bell et al (2025) found interim water quality (salinity) triggers have been exceeded at high intensity response bores 11WP15R, WP13, and WP5. The rising salinity levels are at depth and there are no exposure pathways for the salinity to represent a risk to agriculture or the environment, including MNES (Bell et al., p.33). Most bores show no rising or falling trend in total nitrogen (TN) or total phosphorus (TP). Bell et al. (2025, p.36) discuss the possible causes of rising total nitrogen in six bores (including one reference bore, CG2) and total phosphorus in two bores. Natural forms of contamination were suggested as a cause for rising TN in four bores noting organic N as the dominant N species (11WP11RS, 11WP50, 11WP54D and 11WP9RPB). The nitrogen speciation for bore 11WP11RS was in the form of ammonia and it was noted that the bore headworks were broken, so contamination was suggested as a cause. The two bores with rising trends in TP (11WP50 and 11WP54S, either had rising TN (11WP50) or high TN (11WP54S) in the form of organic N. If the form of contamination was natural, such as dead organisms in the well, this would also explain the elevated TP (Bell et al. p.36). Herbicides were detected in some bores. There are no trigger criteria for pesticides (herbicides, insecticides and fungicides) in groundwater bores. The groundwater discharge environment is at the Keep River K4 pool. The surface water quality monitoring program has recorded metolachlor (herbicide) exceedances in the Keep River over consecutive years. However, there have been no exceedances in the K4 pool and the metolachlor exceedances downstream are the result of agricultural stormwater run-off rather than groundwater discharge via baseflow at the K4 pool. <u>Knox Creek Plain</u> Cropping had only just commenced on the Knox Creek Plain in the 2024 compliance reporting period limited to a portion of Lot 352. Therefore, it is too early to assess groundwater quality trends associated with cropping on the Knox Plain.

Discharge management actions

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 96	Construct a tailwater retention area on each farm lot sufficient to retain stormwater runoff during the periods most critical (low flow periods) to the Keep River system in consultation with DAFWA and the Office of the Environmental Protection Agency.	Capacity to manage runoff to avoid transporting chemicals downstream.	Prior to commencement of irrigation	2024.EMP.96 Goomig Farmland stormwater retention areas – planned and constructed	C	-	<u>Weaber Plain</u> Water retention areas are constructed across the Goomig farm area sufficient to capture 25 mm of stormwater run-off. Retention area locations are shown in evidence item 2024.EMP96. Farm Lot 15 is yet to be developed. The Lot 15 stormwater retention area will be constructed upon farm development. Lots 4, 7, 11 and 15 remain uncleared and not yet in operation.
KEMP 96	Construct a tailwater retention area on each farm lot sufficient to retain stormwater runoff during the periods most critical (low flow periods) to the Keep River system.	Capacity to manage runoff to avoid transporting chemicals downstream.	Prior to commencement of irrigation	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	-	C	<u>Knox Creek Plain</u> Photos 31, 32, 35, 36 and 37 show drainage and retention channels around Knox Lot 352. These drainage and retention channels are also evident in aerial imagery dated May 2024.
EMP 97	No usage of chemicals and fertilisers when the tailwater retention capacity is unavailable.	To prevent the transporting of nutrients and chemicals downstream.	Ongoing from commencement of farming	2024.EMP.93a Keep River 2024-2025 Water Quality Monitoring and Management Report 2024.EMP.93b Keep River 2024-2025 Water Quality Monitoring and Management Report	C	NR	On-farm tailwater recycling avoids discharge of tailwater to the environment. Chemicals are used during the wet season having regard for rainfall, rainfall/weather forecasts, and environmental flows. The Keep River 2023-2024 and 2024-2025 Water Quality Monitoring and Management Reports (2024.EMP93a and 93b) detail water quality monitoring and management information, including responses to exceedances of trigger criteria.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 98	Provide an Information Package to prospective landowners/lessees, which: • outlines the susceptibility of soil to erosion from high intensity rainfall during the wet season, • encourages maintenance of crop cover during the wet season to reduce soil erosion, • outlines optimal irrigation strategies to reduce potential impacts of sodicity and salinity, • includes information regarding identification of salinity and sodicity and mechanisms to report this to the Proponent.	To minimise the potential for agricultural practices to result in erosion by ensuring prospective landowners are aware of the risks and appropriate management measures.	At sublease of farm lots	Not applicable	CLD	CLD	<u>Weaber Plain</u> Item assessed as completed in a previous audit period (Strategen 2015) <u>Knox Creek Plain</u> Item assessed as completed in the 2021 audit period (KBC 2022).
EMP 99	Determine AUSRIVAS trigger score levels for aquatic macro-invertebrates in consultation with the IRG.	To manage the discharge of stormwater and surplus groundwater to protect the downstream environment and EPBC listed species.	Prior to commencement of irrigation	-	CLD	-	Condition 11F of EPBC 2010/5491 was amended on 28 March 2014 to require the following in place of AUSRIVAS trigger score levels: 11F. Use of best practice multivariate analyses on species level macro-invertebrate and fish assemblage data, within an adequate experimental design (as defined in the Aquatic Fauna Management Plan required under condition 10), using multiple indices of 'ecological condition' and a 'weight of evidence' approach, to assess any change in ecological health of Keep River pools (K1, K2 & K3) relative to baseline and upstream reference sites.
KEMP 99	Adopt water quality trigger levels, as developed in consultation with the IRG under EPBC Approval 2010/5491 and EPBC 2014/7143.	To manage the discharge of stormwater and surplus groundwater to protect the downstream environment and EPBC listed species.	Prior to commencement of irrigation	Refer to EMP 93	-	C	Refer to EMP 93

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 100	Establish and update annually, a list of key analytes (chemicals and nutrients) to be sampled, based on-farm practices as part of ongoing water quality monitoring in consultation with DPIRD, DWER and the IRG.	To ensure key chemicals and nutrients are included in water quality monitoring.	Prior to commencement of planting of crops, then ongoing annually	2024.EMP.100 – Record of IRG Meeting held on 30 October 2024.	C	-	The annual farm chemical (pesticide) update was undertaken in October 2024 in consultation with the IRG. Refer to the Record of Meeting held on 30 October 2024 provided as evidence (Agenda Item 6 – Annual farm chemical update). Farm chemical analytes are analysed by the laboratory within larger chemical analysis suites therefore monitoring results are delivered for more than 100 chemical analytes, including the list endorsed by the IRG.
KEMP 100	Establish and update annually, a list of key analytes (chemicals and nutrients) to be sampled, based on-farm practices as part of ongoing water quality monitoring	To ensure key chemicals and nutrients are included in water quality monitoring.	Prior to commencement of planting of crops, then ongoing annually	Refer to EMP 100	-	C	Knox annual farm chemical updates are undertaken in conjunction with Goomig annual farm chemical updates. Refer to EMP100.
EMP 101	Install a water quality and flow gauging station capable of sampling, on a flow proportional basis (at least sub-daily when required) at the stormwater outlet from the Development Area.	To determine flow rate from the Project Area to inform management.	Prior to commencement of planting of crops	2024.EMP.101 - 2024-2025 flow data from stormwater outlet	C	-	<u>Weaber Plain</u> A water quality and flow gauging station was installed during the construction phase. The flow gauging station was not functioning for a period of years until May 2024 when flow monitoring and data transmission recommenced. The 2024-2025 wet season flow data is provided as evidence of flow monitoring at the stormwater outlet from the Development Area. (2024.EMP101).
KEMP 101	Install a water quality and flow gauging station at the stormwater outlet from the Development Area.	Install a water quality and flow gauging station at the stormwater outlet from the Development Area.	To determine flow rate from the Project Area to inform management.	-	-	NR	<u>Knox Creek Plain</u> One Knox stormwater outlet had been installed by the conclusion of 2024 (the 'Field 19 Outlet'). This outlet is in the south-west corner of Lot 352 and discharges to the Knox Creek (see Photos 33 and 34 in 2024.EMP2a). The outlet did not have flow gauging capability in 2024, however, irrigated cropping had not yet commenced on the Knox Creek Plain.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 102	Monitor water quality at the stormwater outlet from the Development Area, in consultation with DPIRD, DWER and DBCA.	To determine salinity and nutrient contribution from the Project Area to inform management.	On a flow proportional basis (with the ability to sample sub-daily as required)	2024.EMP.93a - Keep River 2024-2025 Water Quality Monitoring and Management Report 2024.EMP.93b Keep River 2024-2025 Water Quality Monitoring and Management Report	C	-	<u>Weaber Plain</u> DPIRD monitors water quality at the Goomig stormwater outlet at least weekly during the wet season and when there is stormwater discharge. Water quality is also monitored in the Border Creek and the Keep River. The 2023-2024 and 2024-2025 Keep River Water Quality Monitoring and Management Reports are provided as evidence.
KEMP 102	Monitor water quality at the stormwater outlet from the Development Area	To determine salinity and nutrient contribution from the Project Area to inform management.	On a flow proportional basis (with the ability to sample sub-daily as required)	Not applicable	-	NR	<u>Knox Creek Plain</u> Irrigated cropping had not yet commenced on the Knox Creek Plain in 2024. Keep Farming commenced water quality monitoring at the stormwater outlet in 2025 alongside commencement of cotton production.
EMP 103	Ensure the flow gauging stations at Border Creek and the Keep River have the required accuracy to measure low flow rates in consultation with the Northern Territory NRETAS and IRG.	To provide flow data to manage the discharge of stormwater and surplus groundwater.	Prior to commencement of planting of crops	2024.EMP.103 – NT-WA Agreement for provision of hydrographic services Refer to the Northern Territory Government Water Data Portal: <u>Data - The NT Water Data Portal (aquaticinformatics.net)</u> Gauging Stations: G8100225 – Keep River – Legune Rd Xng, and G8100106 – Border Crk – Weaber Range	C	-	Refer to evidence items

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 104	Monitor water flow at the stormwater outlet from the Development Area, Border Creek and the Keep River, determined in consultation with IRG, DPIRD, DWER and DBCA.	To preserve and protect the water quality of the Keep River and EPBC listed species, prevent erosion of the banks of the Keep River and provide maximum mixing potential.	Ongoing from commencement of irrigation	Refer to EMP 101 and EMP 103	C	-	Refer to EMP 101 and EMP 103
KEMP 104	Monitor water flow at the stormwater outlet from the Development Area and the Keep River to preserve and protect the water quality of the Keep River	To preserve and protect the water quality of the Keep River and EPBC listed species, prevent erosion of the banks of the Keep River and provide maximum mixing potential.	Ongoing from commencement of irrigation	2024.EMP.103 – NT-WA Agreement for provision of hydrographic services Refer to the Northern Territory Government Water Data Portal: Data - The NT Water Data Portal (aquaticinformatics.net) Gauging Stations: G8100225 – Keep River – Legune Rd Xng, and G8100106 Border Crk - Weaber Range	-	NR	<u>Knox Creek Plain</u> One Knox stormwater outlet had been installed by the conclusion of 2024 (the 'Field 19 Outlet'). This outlet is in the south-west corner of Lot 352 and discharges to the Knox Creek (see Photos 33 and 34 in 2024.EMP2a). The outlet did not have flow gauging capability by the conclusion of the 2024 compliance period, however, irrigation had not yet commenced on the Knox Creek Plain. Keep River flow was monitored (refer to EMP103).

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 105	Develop and implement an adaptive groundwater and stormwater discharge program that addresses: - design and location of dewatering infrastructure, - design and location of discharge infrastructure, - discharge rates, rules, and contingency actions, - monitoring locations and requirements including infrastructure and setup, - written evidence of any Northern Territory Government permits that are required for discharge of groundwater, - management measures that ensure discharge of water will not impact on water quality in Border Creek/Keep River; this includes erosion protection measures.	To provide information for adaptive management of the discharge of stormwater and surplus groundwater.	Ongoing after sale/lease of farmland and prior to the commencement of stormwater and groundwater discharge from operational farms	Refer to Tenders WA https://www.tenders.wa.gov.au/watenders/index.do Tender Ref: DPIRD2025101 – Weaber Plain-Goomig groundwater modelling project. 2024.EMP.93a Keep River 2023-2024 Water Quality Monitoring and Management Report 2024.EMP.93b DRAFT Keep River 2024-2025 Water Quality Monitoring and Management Report	C	C	- The design and location of groundwater dewatering infrastructure has not been completed. This will be informed by the outcomes of the Weaber Plain-Goomig groundwater modelling project for which a contract was awarded on 20 November 2025. - Groundwater discharge to the Keep River K1 pool or estuary as contemplated by the approved EPBC 2010/5491 Groundwater Management Plan is not yet planned therefore design and location of discharge infrastructure, discharge rates, rules and contingency actions have not yet been determined and relevant permits from the Northern Territory Government have not yet been obtained. - There is only one stormwater outlet from the Goomig development area, where the DW1 gauging station is located. The gauging station was installed in 2013. One Knox stormwater had been installed by the conclusion of the 2024 compliance period (refer to KEMP101). Other Knox stormwater outlet locations and design were in planning phase. - The surface water quality monitoring and management program is reported in the 2023-2024 and 2024-2025 Keep River Quality Monitoring and Management Reports. Monitoring locations are illustrated in those reports which are provided as evidence. - Key management measures to ensure discharge of agricultural stormwater water will not impact on water quality include: - Farmers have elected not to use metolachlor on Goomig and Knox due to the downstream risk to aquatic fauna - avoidance of discharge of tailwater by recycling tailwater on-farm - capture of the first flush stormwater into water storages on-farm and retention until capacity is exceeded or when capacity needs to be returned to capture stormwater during periods of low environmental flows. - on-farm management practices, including pesticide selection and application practices. - farmer education and extension activities. - water quality and flow monitoring and data sharing.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 106	Refine the discharge dilution model/relationship based on river flow monitoring data and water quality history from the Ord Stage 1 D4 drain and available water quality data from the Keep River system.	To determine when flow rates at Border Creek and the Keep River fall below a minimum flow rate to enable flushing.	Prior to commencement of irrigation	Romero (2023) Managing Water Quality to Enable Future Irrigation Development in the Kimberley Region 2024.EMP.93a Keep River 2023-2024 Water Quality Monitoring and Management Report 2024.EMP.93b DRAFT Keep River 2024-2025 Water Quality Monitoring and Management Report	C	-	An improved understanding of the discharge dilution relationship was achieved through commissioning of GHD to update the Keep River hydrodynamic model and run discharge scenarios for select farm chemical analytes using flow monitoring data from the Development Area, Border Creek, and Keep River gauging stations. This work is reported in Romero (2023). In practice, the minimum river flow rates to enable flushing depends on the specific chemical (each have different mobilities, degradation rates and PC99 levels) and its concentration at a given location. DPIRD assesses chemical presence and concentration through implementation of a water quality monitoring program when there is stormwater discharge during the wet season. Therefore, DPIRD knows with certainty whether flow rates fall below a minimum to enable flushing, although in hindsight given time taken to receive water quality results from the laboratory. It is not possible to cease stormwater discharge once on-farm storage capacity has been exceeded. The management options at this point include: • Consideration of weather and rainfall forecasts to assess whether flows may increase and naturally flush concentrations from the river, • Release of fresh irrigation water from the M2 irrigation water supply channel, • Cessation of further farm chemical application. • Future farm practice improvement.
KEMP 106	Refine the discharge dilution model/relationship based on river flow monitoring data	To determine when flow rates at the Keep River fall below a minimum flow rate to enable flushing.	Prior to commencement of irrigation	Refer to EMP 106	-	C	
EMP 107	Refine the discharge dilution model/relationship based on flow monitoring data from the Development Area and the Keep River system and water quality characteristics of stormwater from the Development Area.	To determine when flow rates at the Keep River fall below a minimum flow rate to enable flushing.	On a seasonal basis, commencing 12 months after commencement of irrigation	Refer to EMP 106	C	NR	
EMP 108	Refine flow trigger values for the Keep River and Border Creek gauging station based on the refined discharge dilution model and Operational Surface Water Model.	To determine when flow rates at Border Creek and the Keep River fall below a minimum flow rate to enable flushing.	Ongoing after sale/lease of farm lots or commencement of farming activity	Refer to EMP106	C	-	
KEMP 108	Review/refine trigger values for the Keep River pools.	To update discharge model.	Annually	Not applicable	-	C	

Discharge monitoring regime and corrective actions

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 109	Telemetered flow monitoring at development gauge, existing gauging stations along Border Creek and the Keep River and in groundwater discharge pipe.	Continuous (hourly) flow monitoring when stormwater or groundwater discharge occurs.	No discharge of surplus groundwater to the Keep River unless there is sufficient threshold natural flow. No significant impact on the health of aquatic ecosystems from stormwater and surplus groundwater.	- Investigate cause. This could include examining management practices and identifying instances where water may have been unnecessarily discharged during low flow periods. - Conduct an intensive water quality sampling program upstream and downstream of the discharge point. - Immediately initiate processes to identify whether remedial action is required, in consultation with the IRG. Remedial actions could include: - releasing irrigation water from the M2 channel into Border Creek - increasing groundwater pumping into the Ord Stage 1 or 2 supply channel during periods of low river flow - installing additional erosion protection - educating farm owners/managers - revision of management practices (including groundwater discharge rules). - Implement remedial action/s. - Monitor success of remedial action/s quarterly for a period of 12 months - Report on any findings as a result of monitoring.	Refer to the Northern Territory Government Water Data Portal: Data - The NT Water Data Portal (aquaticinformatics.net) Gauging Stations: G8100225 – Keep River – Legune Rd Xng, and G8100106 – Border Crk – Weaber Range 2024.EMP101 - 2024-2025 flow data from stormwater outlet	C	-	Refer to EMP 101 and EMP 103

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
KEMP 109	Telemetered flow monitoring at the development gauge, and the existing gauging station on the Keep River and in groundwater discharge pipe.	Continuous (hourly) flow monitoring when stormwater or groundwater discharge occurs.	No discharge of surplus groundwater to the Keep River unless there is sufficient threshold natural flow. No significant impact on the health of aquatic ecosystems from stormwater and surplus groundwater.	- Investigate cause. This could include examining management practices and identifying instances where water may have been unnecessarily discharged during low flow periods. - Conduct an intensive water quality sampling program upstream and downstream of the discharge point. - Immediately initiate processes to identify whether remedial action is required, in consultation with the IRG. Remedial actions could include: - releasing irrigation water from the M2 channel into Knox Creek - increasing groundwater pumping into the Ord Stage 1 or 2 supply channel during periods of low river flow - installing additional erosion protection - educating farm owners/managers - revision of management practices (including groundwater discharge rules). - Implement remedial action/s. - Monitor success of remedial action/s quarterly for a period of 12 months - Report on any findings as a result of monitoring.	Refer to KEMP 104	-	NR	Refer to KEMP 104

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 110	Aquatic ecology monitoring (including aquatic invertebrates and fish) in the Keep River pools (K1, K2, K3 and K4) and threatened aquatic ecology monitoring at three sites in the Keep River estuary (EST1, EST2, EST3).	Annually in the late dry season from the commencement of the action. Initially for three years to establish a baseline, and then for a further three years post-development. If there is no detectable effect on any of the species included in the aquatic monitoring program, then frequency is reduced to three-yearly, or in response to known events that may result in exceedances of site-specific trigger values for water quality Keep River.	No detrimental change in the AUSRIVAS macroinvertebrate category and in fish assemblage composition that is caused by the action. This can be resulting from stormwater, surplus groundwater and groundwater seepage increases, as compared against reference sites that reflect natural variability in ecosystem health.	1. Immediately investigate cause over a period of at least 12 months through reviewing management practices and determining whether ecological health of aquatic fauna has deteriorated. 2. Identify remedial action required. Remedial actions could include: • releasing irrigation water from the M2 channel in Border Creek • increasing the pumping rates of the eastern bores to reduce groundwater seepage. • increasing groundwater pumping into the Ord Stage 1 or 2 supply channel during periods of low river flow • potentially, pending analysis, discharging groundwater into the lower Keep River estuary • installing additional erosion protection • educating farm owners/managers • revision of management practices (including groundwater discharge rules) • review flow monitoring data. 3. Implement remedial action/s, as required, immediately or at a time determined with the IRG to be appropriate. 4. Monitor success of remedial action/s at least quarterly for 12 months. 5. Report on any findings in Annual Environmental Report (AER) as a result of monitoring.	2024.EMP.110 – Contract award – Keep River aquatic ecology monitoring	C	-	Baseline monitoring was undertaken in 2011, 2012 and 2013. Monitoring was undertaken for three years post development in 2020, 2021 and 2022. Both baseline and post-development monitoring programs were conducted in the Keep River pools and estuary sites and at five reference locations. The outcomes of the 2020 to 2022 surveys indicated the Goomig project had not caused any adverse change to Keep River ecological health. The IRG agreed at its meeting of March 2023 that the frequency of survey can be reduced to three-yearly with the next survey to be undertaken in 2025.

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
KEMP 110	Utilise the aquatic ecology monitoring conducted under EPBC Approval 2010/5491 as an indicator of the outcomes of the combined Weaber and Knox management.	Ongoing	No detrimental change in the AUSRIVAS macroinvertebrate category and in fish assemblage composition that is caused by the action. This can be resulting from stormwater, surplus groundwater and groundwater seepage increases, as compared against reference sites that reflect natural variability in ecosystem health.	1. Immediately investigate cause over a period of at least 12 months through reviewing management practices and determining whether ecological health of aquatic fauna has deteriorated. 2. Identify remedial action required. Remedial actions could include: • releasing irrigation water from the M2 channel into Border Creek to flush fresh water to the Keep River • increasing the pumping rates of the eastern bores to reduce groundwater seepage • increasing groundwater pumping into the Ord Stage 1 or 2 supply channel during periods of low river flow • potentially, pending analysis, discharging groundwater into the lower Keep River estuary • installing additional erosion protection • educating farm owners/managers • revision of management practices (including groundwater discharge rules) • review flow monitoring data. 3. Implement remedial action/s, as required, immediately or at a time determined with the IRG to be appropriate. 4. Monitor success of remedial action/s at least quarterly for 12 months. 5. Report on any findings in Annual Environmental Report (AER) as a result of monitoring.	Refer to EMP 110	-	C	Refer to EMP 110

Biodiversity and habitat management actions

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 111	Induct personnel on biodiversity and habitat management measures	To minimise potential for adverse environmental impacts by ensuring personnel are informed of appropriate environmental management procedures.	Within one week of personnel commencing work on-site	-	C	C	There is no available evidence to confirm that personnel environmental inductions were being undertaken in 2024. However, potential adverse terrestrial biodiversity impacts were minimised because there was no clearing in the Weaber Plain or Knox development areas in 2024 and personnel are restricted from accessing the buffer areas, other than authorised personnel.
EMP 112	Ensure development maps clearly delineate the Buffer Area and Development Area.	To prevent unauthorised clearing by ensuring clearing boundaries are appropriately documented.	Prior to ground disturbance	Refer to approved FPDPs	C	C	Refer to approved FPDPs: Strategen (2010) Ord River Irrigation Area – Weaber Plain Development Project Phase 1 Final Project Design Plan Strategen (2011) Ord River Irrigation Area – Weaber Plain Development Project Phase 2 Final Project Design Plan KBC (2019) Knox Creek Plain Agricultural Development Final Project Design Plan Amended – July 2019 Revision C ³
EMP 113	Delineate the boundaries of the vegetation to be cleared for construction in the field with flagging tape, signage or fencing.	To prevent unauthorised clearing by ensuring clearing boundaries are appropriately marked in the field.	Prior to ground disturbance	Refer to the evidence provided at 938:M6.1.	C	C	<u>Weaber Plain</u> No clearing was undertaken in the Weaber Plain development area in 2024. <u>Knox Creek Plain</u> No clearing was undertaken in the Knox Creek Plain development area in 2024 (no clearing since December 2023). There are a few small lots still to be cleared – Lots 370, 354, 362 and 366 in accordance with the approved Knox FPDP dated September 2025.

³ Revision C was superseded by a revised FPDP dated September 2025 (Keep Farming Pty Ltd, 2025), approved by DWER on 6 October 2025

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 114	Restrict movement of construction machinery and equipment to designated tracks and roads.	To minimise disturbance by consolidating vehicle access to designated areas.	Ongoing from commencement of ground disturbance	2024.EMP.8a – File note of site inspection – Knox operations centre – 8 April 2024 2024.EMP.8b – File note of site inspection – Knox operations centre – 28 August 2024 2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	C	C	<u>Weaber Plain</u> Construction of shared infrastructure on the Weaber Plain was completed in 2014. There was no construction activity in the Weaber Plain development area in 2024. <u>Knox Creek Plain</u> Construction machinery and equipment was restricted to the development area at the time of formal site inspections on 28 April 2024, 28 August 2024 and 16 April 2025; and during other visits to the Knox development area and buffer in 2024.
EMP 115	Stage clearing of vegetation so that areas are cleared only as required.	To minimise the area of exposed surfaces at any one time and to allow native animals the chance to move on.	During construction of shared infrastructure	-	C	C	<u>Weaber Plain</u> Construction of shared infrastructure on the Weaber Plain was completed in 2014. No clearing was undertaken in 2024. <u>Knox Creek Plain</u> There was no clearing of vegetation in the Knox development area in 2024. There are a few small lots still to be cleared – Lots 370, 354, 362 and 366 in accordance with the approved Knox FPDP dated September 2025.
EMP 116	Manage topsoil in accordance with the Soil Management Sub-plan	To provide a natural source of seed, organic matter, and microorganisms for areas to be rehabilitated.	During construction of infrastructure	2024.EMP.5a – Area 11 – Sediment traps, drainage and topsoil stockpiles	NR	C	<u>Weaber Plain</u> Construction of shared infrastructure on the Weaber Plain was completed in 2014. The location of Area 11 topsoil stockpiles is recorded (2024.EMP5a) <u>Knox Creek Plain</u> There are no disturbed areas on the Knox Creek Plain that will require rehabilitation (therefore topsoil has not been stored). The approved Knox FPDP dated September 2025 includes a proposed borrow pit in the Knox buffer area. The FPDP (p.50) states that a rehabilitation plan is under development.
EMP 117	Give native animals encountered on-site the opportunity to move on if there is no threat to personnel safety in doing so.	To prevent injury or death to native animals.	Ongoing from commencement of ground disturbance	-	C	C	There is no available evidence to confirm compliance status with this item. However, the risk of native animal injury or death was low as there was no native vegetation clearing in the Weaber Plain or Knox development areas in 2024.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 118	Call the nominated carer or Wildlife Hotline to rescue sick or injured native animals if they are encountered.	To prevent loss of native animals.	Ongoing from commencement of ground disturbance	-	C	C	Refer to EMP 117

Biodiversity and habitat monitoring regime

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 119	Compliance of marked clearing boundary with development maps.	Daily	No clearing adjacent to areas where clearing boundaries are not defined.	Report as Environmental Incident and initiate Incident Procedure which shall include: - investigating the cause of the incident, - redefining boundaries.	Not applicable	NR	NR	<u>Weaber Plain</u> No clearing was undertaken in the Weaber Plain development area in 2024. <u>Knox Creek Plain</u> No clearing was undertaken in the Knox Creek Plain development area in 2024.
EMP 120	Extent of clearing and ground disturbance along pre-defined boundaries.	Daily	No clearing or disturbance outside of pre-defined boundaries (Figure 1).	Report as Environmental Incident and initiate Incident Procedure which shall include: - investigating the cause of the incident - redefining boundaries if due to inadequate boundary marking, - rehabilitating affected area as required in accordance with the Rehabilitation Management Sub-plan, - monitoring the success of remedial action.	Not applicable	NR	NR	<u>Weaber Plain</u> No clearing was undertaken in the Weaber Plain development area in 2024. <u>Knox Creek Plain</u> No clearing was undertaken in the Knox Creek Plain development area in 2024.

Buffer management actions

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 121	Control vehicle access to the buffer through designated tracks, and provision of signage to inform of restrictions to areas, including speed restrictions, hygiene protocols, and to advise that no off-track driving is permitted.	To minimise impacts to the buffer by consolidating and restricting access	At all times	Access tracks are visible on aerial imagery.	C	-	Vehicular access to the Goomig buffer area is limited to three entry points and established access tracks including track to the DW1 gauging station. There is no visible signage at entry points to the buffer area, however, the entry points are gated and practically difficult to access thus achieving the purpose of this management action.
KEMP 121	Control vehicle access to the buffer through designated tracks and provision of signage to inform of restrictions to areas.	To minimise impacts to the buffer by consolidating and restricting access	At all times	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	-	C	There is no signage at entry points to the buffer area, however, the entry points are obscure and practically difficult to access thus achieving the purpose of this management action. In addition, farm biosecurity signs are posted at ingress points to the Knox development area (see Photo 45 in 2024.EMP2a) which discourages access to the development area and, consequently, to the buffer areas beyond. No evidence of vehicle disturbance beyond established access tracks was observed during site inspection on 16 April 2025. DPIRD staff accompanied KAI on its annual bore monitoring run in September 2024. Access was via designated tracks only.
EMP 122	Control human access to the buffer through provision of signage at entry points to Buffer Area advising of restrictions and no unauthorised access.	To minimise impacts to the buffer by restricting access	At all times	-	C	-	There is no visible signage at entry points to the buffer area, however, the entry points are gated and practically difficult to access thus achieving the purpose of this management action. No unauthorised access to the buffer area was observed by DPIRD during multiple visits to the Goomig buffer area over the course of 2024 therefore the purpose of this action has been achieved. The visits to the buffer areas included: • Buffer vegetation condition assessment (June 2024) • Weed monitoring (October 2024) • Groundwater monitoring program (September 2024) • Fencing and fire break inspection (August 2024) • Typhonium surveys (February and March 2024).

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 123	Induct all personnel constructing or utilising infrastructure within the Buffer Area, including roads, channels, groundwater bores and the phone tower, to advise on protocols for hygiene, wildlife encounters, prohibited activities etc.	To minimise potential for adverse environmental impacts by ensuring personnel are informed of environmental management procedures	Within one week of commencing work on-site	Refer to comments.	C	-	Goomig buffer access in 2024 was for TsK survey, groundwater monitoring and other environmental compliance monitoring and management activities. These activities are undertaken by experienced DPIRD and KAI staff aware of protocols. No infrastructure was constructed in the Goomig buffer area in 2024. The phone tower is located adjacent to the access track to the DW1 gauging station, therefore access to the tower for maintenance purposes presents low risk to the buffer area.
KEMP 123	Induct all personnel constructing or utilising infrastructure within the Buffer Area, including roads and groundwater bores.	To minimise potential for adverse environmental impacts by ensuring personnel are informed of environmental management procedures	Within one week of commencing work on-site	-	-	C	Access to the Knox the buffer area in 2024 was for TsK and groundwater monitoring and other environmental compliance monitoring and management activities. These activities are undertaken by experienced DPIRD and KAI staff aware of protocols. No infrastructure was constructed in the Knox buffer area in 2024.
EMP 124	Assess and map vegetation condition within the buffer according to the Keighery (1994) Vegetation Condition rating scale.	To provide data to inform management.	Prior to ground disturbance	-	CLD	CLD	<u>Weaber Plain</u> Item assessed as completed in a previous audit period. Baseline vegetation condition assessment and mapping was undertaken in 2011 (Botanical North 2011). <u>Knox Creek Plain</u> Item assessed as completed in a previous audit period. Baseline vegetation condition assessment and mapping was undertaken in 2015 (Ord Land and Water 2015).

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 125	Stabilise and revegetate areas identified as containing vegetation below a rating of 'Very Good' in accordance with species lists and planting procedures determined in consultation with DPW AND/OR DER.	To better enable the Buffer Area to fulfil its intended role and purpose by restoring ecological integrity and function to degraded areas.	Within 12 months of completion of construction of infrastructure	-	PNC	-	This item was assessed as completed in a previous audit period (KBC 2021). Strategen (2015) had recommended revision of revegetation requirements in consultation with the OEPA and deletion of this action if agreed that revegetation is unnecessary due to natural regeneration and other management actions being undertaken. This item has been assessed as potentially non-compliant since DPIRD has no explicit evidence of stabilising/revegetating areas of vegetation below a rating of Very Good being undertaken. The timing applicable to this action is for rehabilitation to occur within 12 months of the completion of construction. Landcorp oversaw this through the Leighton contract in 2013-2014. Any rehabilitation undertaken is understood to be documented in older Landcorp records, which DPIRD does not possess. Inspections of buffer condition support that stabilising and revegetating large parts of the buffer are not required. Furthermore, on the advice of Department of Water and Environmental Regulation (DWER), DPIRD has determined that the vegetation condition rating scale is not appropriate for assessing vegetation condition within the Goomig buffer.
KEMP 125	Stabilise and spread topsoil (if available) in areas identified as containing vegetation below a rating of 'Very Good' in accordance with species lists and planting procedures determined in consultation with DPW.	To better enable the Buffer Area to fulfil its intended role and purpose by restoring ecological integrity and function to degraded areas.	Within 12 months of completion of construction of infrastructure	Refer to EMP 70	-	NR	Construction of infrastructure is not yet complete. Strategen's (2015) recommendation (refer to EMP125) is also applicable to Knox.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 126	In consultation with the DPW and/or DER and DoW, revegetate areas within the buffer with species selected specifically for their ability to lower the groundwater table, given the local soil, water and solute settings. Species used in such revegetation will be agreed with the DPW AND/OR DER and DoW.	To improve the ability of the buffer to reduce the potential impacts of elevated groundwater levels and minimise diffuse groundwater discharge (including salts) to downstream watercourses.	Within 12 months of completion of construction of infrastructure and as determined to be required in consultation with DPW AND/OR DER and DoW	-	NC	-	This item was assessed as completed in a previous audit period (KBC 2021), however, there is no evidence that this action was completed. Strategen (2015) had recommended revision or deletion of this action in consultation with the OEPA and other relevant agencies.
KEMP 126	If required for degraded areas, revegetate areas within the buffer with species selected specifically for their ability to lower the groundwater table, given the local soil, water and solute settings.	To improve the ability of the buffer to reduce the potential impacts of elevated groundwater levels and minimise diffuse groundwater discharge (including salts) to downstream watercourses.	Within 12 months of completion of construction of infrastructure and as determined to be required in consultation with DPW.	-	-	NR	Construction of infrastructure in Knox buffer (eg fencing) has not yet commenced. Strategen's (2015) recommendation (refer to EMP125) is also applicable to Knox.

EMP 127	Undertake weed control in areas identified as containing vegetation below a rating of 'Very Good', focusing on the most degraded areas first and in accordance with procedures detailed in the Weed, Plant Pathogen and Pest Animal Management Sub-plan.	To better enable the Buffer Area to fulfil its intended role and purpose by restoring ecological integrity and function to degraded areas.	Within 12 months of completion of construction of infrastructure and ongoing	2024.EMP.54a – Goomig Project – 2024 Weed Monitoring Program Report	C	NR	<u>Weaber Plain</u> Strategen's (2015) recommendation is applicable to this item. DPIRD considers the action of targeting vegetation below a rating of Very Good, focusing on the most degraded areas has been undertaken. KAI undertakes annual chemical control of Parkinsonia weed in priority areas in the buffer. It is noted from the Goomig 2024 weed monitoring program that the % cover of weeds along weed transects is not higher than the previous year and there was no new weed species recorded. <i>The Goomig project – 2024 Weed Monitoring Program (2010.5491.2025.032)</i> identified Parkinsonia at transect WMP_w2 transect. The Goomig Weed Survey Report 2025 found that weed monitoring transect WMP_w2 no longer contained Parkinsonia in October 2025. DPIRD considers this as evidence, along with the GLAW ledger, that specific Parkinsonia treatment has been undertaken in the degraded areas. The previously degraded areas near Goomig Lot 3 have had historic weed control. The original 2013 Ord River Irrigation Area – Weaber Plain Development Project Phase 2 Weed Control Program (Strategen, 2013) showed 90% Parkinsonia in the old D8 swamp area. <i>The Goomig project – 2024 Weed Monitoring Program</i> shows that sustained improvement has been observed due to years of weed control by KAI. DPIRD considers this is evidence of a weed control program being undertaken over the 11 year period since 2013. DPIRD's work to revise the environmental management plans will address this historic non-compliance and determine which vegetation condition arrangement is suitable for the buffer. <u>Knox Creek Plain</u> Construction of infrastructure in Knox buffer (eg fencing) has not yet commenced. Strategen's (2015) recommendation (refer to EMP125) is also applicable to Knox.
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Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 128	Liaise with DPW with regard to their plans for implementation of the State Cane Toad Strategy (DEC 2009) in the Development Area.	To reduce the potential effect of cane toads on the Buffer Area.	As required	Not applicable	CLD	N/A	Item assessed as completed in a previous audit period (refer to Strategen 2015).
EMP 129	Provide information to land owners and Traditional Owners, on the Cane Toad Strategy for Western Australia (DEC 2009).	To reduce the potential effect of cane toads on the Buffer Area	At sublease of farm lots	Not applicable	CLD	N/A	Item assessed as completed in a previous audit period (refer to Strategen 2015).
EMP 130	Investigate the possibility of extending the DPW AND/OR DER Traditional Owner Ranger Program (Kununurra based) into the Buffer Area or incorporating other Indigenous management initiatives – consult with MG Corporation regarding shared responsibilities for maintenance of the Buffer Area.	To maximise opportunities for involvement of Traditional Owners in ongoing management of the Buffer Area	Ongoing	Not applicable	CLD	NA	Item assessed as completed in a previous audit period (refer to Strategen 2015).
EMP 131	Maintain the Buffer Area perimeter fencing, where required, to minimise stock invasion, remove introduced livestock, and continue to remove any subsequent invading livestock, as required, to protect native vegetation condition	To ensure species and habitats within the Buffer Area are not adversely affected by stock grazing	Ongoing	2024.EMP.131 Goomig Fencing and Firebreak Inspection – August 2024	C	NR	<u>Weaber Plain</u> DPIRD inspected buffer perimeter fencing and firebreaks in August 2024. Buffer fencing was found to be in good condition. Although cattle were observed in the Goomig buffer area in June 2024 (see EMP72), cattle were destocked from the buffer, the gate that was found to be left open was closed, and the matter was raised with the pastoral station sub-lessee. Ingress of cattle into the buffer generally occurs only during the wet season where fencing across creek lines is destroyed by water flow. Mustering programs are devised around seasonal influences. Cause(s) of increased cattle activity in the buffer should continue to be investigated, including maintenance of perimeter fencing, and corrective actions taken to address the causes. <u>Knox Creek Plain</u> Knox Creek Plain buffer perimeter fencing has not yet been established. The revised Knox FPDP dated September 2025 includes a fencing plan.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 132	Implement the Fire Management Sub-plan.	To reduce the potential for impacts of fire on the buffer, infrastructure, MNES populations and habitats	Ongoing	2024.EMP.131 Goomig Fencing and Firebreak Inspection – August 2024 Refer to Fire Scars by Year on the Northern Australia & Rangelands Fire Information website: https://www.firenorth.org.au/nafi3/	NC	-	The Fire Management Sub-plan comprising section 5.0 of the Weaber Plain EMP is not being implemented. A fire management plan was drafted to satisfy EPBC 2010/5491 and MS938, however, the plan was not finalised and approved. The draft plan requires overhaul so that it is based on risk and outcomes. Some fire management actions are being undertaken including: - Approximately 7,000ha of irrigated fields, large channels and sealed roads provide effective firebreaks for the south-easterly-originating fires which have historically affected the Goomig area. - Maintenance and inspection of fire breaks, - Maintenance of access tracks. - The western part of the Goomig Project environmental buffer area is subject to controlled burns implemented by DBCA in the adjacent Goomig Conservation Park which forms part of a landscape contiguous with the buffer, - The fire scar, including extent and timing of fires, is monitored through the North Australia & Rangelands Fire Information service.
KEMP 132	Prepare Knox Creek Plain fire management plan in compliance with Shire of Wyndham East Kimberley (SWEK) and Department of Fire and Emergency Services (DFES) requirements.	To identify fire risk areas, prevention, and control strategies.	Prior to ground disturbance	Refer to Fire Scars by Year on the Northern Australia & Rangelands Fire Information website: https://www.firenorth.org.au/nafi3/	-	NC	A Knox Creek Plain fire management plan had not been prepared by the conclusion of the 2024 compliance reporting period. Keep Farming (2025) stated that ‘a fire management plan to meet WA Department of Fire and Emergency Services (DFES) and Shire of Wyndham East Kimberley (SWEK) requirements is in preparation, and will be updated regularly as required under the Knox Creek Plain EMP.’
	Firebreak and buffer management access construction and annual maintenance in compliance with SWEK and/or DFES requirements.	To assist in fire containment in the event of wildfire or controlled burns.	Ongoing from commencement of ground disturbance		-	PNC	A fire management guide was prepared in 2025 for Knox and has been provided to DPIRD, with this item to be assessed as compliant in 2025.
	Inspect fuel hazards within various zones and implement fire hazard reduction.	To minimise risk of uncontrollable fire outbreak.	Annually		-	PNC	KAI (2025) reported that:

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
	Ensure correct storage and isolation of flammable substances.	To reduce risk of fire.	Ongoing		-	PNC	- Keep Farming notes that most local fires originate to the south-east in the NT or are controlled DBCA burns in the Goomig (Pincombe Range) Conservation Park. The construction of Knox farms and channels between the border and Goomig acts as significant firebreak to the Goomig Conservation Park buffer. - Extending the buffer firebreak network requires additional clearing (and maintenance). Keep Farming has included the buffer fencing and firebreak footprint in the FDDP provided to DPIRD in March 2025.' The Knox buffer area remained unburnt during the 2024 compliance reporting period. Refer to Fire Scars by Year on the Northern Australia & Rangelands Fire Information website: https://www.firenorth.org.au/nafi3/
	Obtain fire permits for controlled burns.	To ensure compliance with local government requirements and to restrict burning to when climatic conditions are such that risk of wildfire is minimised.	Ongoing		-	PNC	
	Investigate all fires originating in the Knox Creek Plain.	To prevent re-occurrence where possible.	Ongoing			PNC	

Buffer monitoring regime

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 133	Assess vegetation condition using the Keighery (1994) rating scale and update vegetation condition map.	Annually commencing within 12 months of the commencement of the action.	All areas within buffer to be in 'Very Good' or better condition.	Investigate cause, e.g. cattle intrusion, loss of seed through heavy rains. Take appropriate remedial actions, e.g. feral animal eradication programs, stabilise and revegetate area. Monitor success of remedy (annually at time of regular monitoring).	2024.EMP.133 Buffer vegetation condition assessment 2024	NC	NC	DPIRD undertook buffer vegetation condition assessment in June 2024. The assessment report is provided as evidence (2024.EMP133). Vegetation at most monitoring sites was found to be below the target of Very Good condition. Five of 16 sites in the Goomig buffer were assessed as being in poor condition: GOO2 GOO3, GOO4, GOO8 and GOO14. The assessment report notes evidence of moderate to heavy grazing at site GOO8 and site GOO14 seems to be heavily inundated over the wet season with sections of bare earth recorded. The report does not comment on the possible cause of the poor condition ratings at sites GOO2, 3 or 4. One of 11 sites in the Knox buffer was assessed as being in poor condition. The one poor condition site (KNX11) with the most frequently recorded plant being a sedge.

Rehabilitation management actions

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 134	Select reference sites in buffer and conservation areas containing landforms and vegetation comparable (or likely to have been comparable) to those of planned disturbance areas not required post-construction.	To locate suitable sites against which to compare rehabilitation success.	Prior to ground disturbance	2024.EMP.134 – Memo report on reference site selection and monitoring procedures (Phoenix Environmental 2024)	C	NR	<u>Weaber Plain</u> DPIRD engaged environmental consultant, Phoenix Environmental, in March 2024 to survey historic rehabilitated areas (in the Goomig buffer area), identify, and select appropriate reference sites; and provide a methodology for rehabilitation assessment for the rehabilitated areas. This work was completed and a memo report delivered to DPIRD in August 2024 (2024.EMP134). This item is now assessed as compliant despite the timing requirement not being met. <u>Knox Creek Plain</u> There were no areas under or requiring rehabilitation in the Knox Creek Plain area in 2024. The proposed borrow pit site identified in the Knox FPDP dated September 2025 will require rehabilitation in future.
EMP 135	Survey reference sites identified in Item 1 [EMP 134] to determine indicator species, density of native species, % cover of native species, native species richness and % weed cover as outlined in the monitoring procedures.	To provide data against which rehabilitation success can be measured.	Prior to ground disturbance and quarterly throughout the rehabilitation process	Western Environmental (2025) – to be addressed in the 2025 compliance assessment report	NC	NR	<u>Weaber Plain</u> Survey of reference sites had not been undertaken by the conclusion of the 2024 compliance reporting period therefore this item is assessed as non-compliant. DPIRD engaged environmental consultant, Western Environmental, early 2025 to undertake survey of rehabilitation sites and reference sites and report on the success of rehabilitation. The assessment report was delivered to DPIRD in October 2025. This will be addressed in the 2025 compliance assessment report. <u>Knox Creek Plain</u> Refer to EMP 134

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 136	Determine parameters and targets for each indicator species as appropriate. e.g. density of indicator species, % cover of indicator species, etc.	To enable specific aspects of rehabilitation success to be measured.	Prior to ground disturbance	Western Environmental (2025) – to be addressed in the 2025 compliance assessment report	NC	NR	<u>Weaber Plain</u> This action of determining parameters and targets for indicator species had not been undertaken by the conclusion of the 2024 compliance reporting period therefore this item is assessed as non-compliant. DPIRD engaged environmental consultant, Western Environmental, in 2025 to undertake survey of rehabilitation sites and reference sites and report on the success of rehabilitation through reference to completion criteria, including criteria for indicator species. The assessment report was delivered to DPIRD in October 2025. This will be addressed in the 2025 compliance assessment report. <u>Knox Creek Plain</u> Refer to EMP 134
EMP 137	Undertake a weed survey of the project area to establish baseline information in accordance with the Weed, Plant Pathogen and Pest Animal Management Sub-plan.	To provide data to inform management.	As specified in the Weed, Plant Pathogen and Pest Animal Management Sub-plan	-	CLD	CLD	Item assessed as completed in a previous audit period. Refer to Botanical North (2011), Botanical North (2012a), Botanical North (2012b) and Ord Land and Water (2015).
EMP 138	Develop a species list for seed collection based on species known to germinate from seed and/or that can be propagated by nurseries (may require consultation with nurseries and rehabilitation specialists in the area).	To maximise potential for rehabilitation success by ensuring appropriate species are used in seeding/planting.	As required for rehabilitation	2024.EMP.134 – Memo report on reference site selection and monitoring procedures (Phoenix Environmental 2024) Western Environmental (2025)	NC	NR	Reports by Phoenix Environmental (2024) and Western Environmental (2025) include species lists for rehabilitation and reference sites. A species list specifically for seed collection purposes had not been developed by the conclusion of 2024 therefore this item is assessed as non-compliant. Western Environmental (2025) provided recommendations for remedial work including recommended spot planting of native upper canopy species at the rehabilitation sites. This will be addressed in the 2025 compliance assessment report.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 139	Contract experienced seed collector licensed by the DPW AND/OR DER to undertake a seed collection program of plant species endemic to the project area following <i>Florabank Guidelines</i> (Greening Australia 2009) including: - gathering information and targeting certain species - undertaking seed collection in the optimum season for the species - collecting only mature seed - determining seed collection method (e.g. natural seed fall, collection by hand, mechanical harvesting, etc. - maintaining detailed record sheets to provide evidence that the seed is local provenance, e.g. date of collection, time of collection, person undertaking collection etc. - preparing material for transportation.	To maximise potential for rehabilitation success by ensuring seed collection is undertaken in accordance with appropriate guidelines and procedures.	As required for rehabilitation	-	NC	NR	Seed collectors have not been contracted therefore this item is assessed as non-compliant. However, the need for this action requires review having regard for the rehabilitation site assessment results and recommendations by Western Environmental 2025.
EMP 140	Ensure all seed to be used in rehabilitation is sourced from species that are endemic to the area/local provenance (unless otherwise authorised by the DPW AND/OR DER).	To ensure species used in rehabilitation have adaptations to suit local conditions.	As required for rehabilitation	Refer to EMP 134 and EMP 135	NR	NR	No sourcing of seed was undertaken in 2024.
EMP 141	Monitor the progress of seed collection and store and process seed in accordance with the seed collection and direct seeding procedure.	To maximise potential for rehabilitation success by ensuring seed collection is undertaken appropriately.	As required for rehabilitation	Refer to EMP 134 and EMP 135	NR	NR	No seed collection was undertaken in 2024.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 142	Implement hygiene management actions as outlined in the Weed, Plant Pathogen and Pest Animal Management Sub-plan.	To maximise potential for rehabilitation success by preventing the introduction and/or spread of weeds and plant pathogens into rehabilitation areas.	As specified in the Weed, Plant Pathogen and Pest Animal Management Sub-plan	-	C	NR	<u>Weaber Plain</u> Rehabilitation sites were not accessed in 2024, other than for environmental field survey undertaken by Phoenix Environmental on 18 April 2024. <u>Knox Creek Plain</u> Refer to EMP 134
EMP 143	Control stock within buffer area in accordance with the Weed, Plant Pathogen and Pest Management Sub-plan.	To maximise potential for rehabilitation success by preventing stock from entering rehabilitation areas.	As specified in the Weed, Plant Pathogen and Pest Animal Management Sub-plan	Refer to EMP 72	C	C	Refer to EMP72. Stock was observed in the buffer and corrective actions implemented to muster and de-stock. Therefore, this is assessed as compliant.
EMP 144	Ensure all foreign material is removed from the site to be recycled or reused where practicable or disposed of off-site before rehabilitation is carried out.	To enable rehabilitation to commence.	Prior to rehabilitation	-	NR	NR	<u>Weaber Plain</u> There were no areas under rehabilitation in the 2024 compliance assessment period. The Area 11 basic raw materials area is still active. A mine closure plan has been prepared to guide the progressive rehabilitation of Area 11. Rehabilitation has not commenced. <u>Knox Creek Plain</u> There were no areas requiring or under rehabilitation in the Knox development area or buffer area in 2024.
EMP 145	Areas suspected to be contaminated by spills or leaks of hydrocarbons and/or inappropriate disposal of wastes will be investigated to determine the presence and/or level of contamination.	To determine whether rehabilitation areas are required to be remediated.	Prior to rehabilitation	-	NR	NR	Refer to EMP 144
EMP 146	Remediate any soils that are determined to be contaminated.	To maximise potential for rehabilitation success by ensuring rehabilitation areas are not contaminated.	Prior to rehabilitation	-	NR	NR	Refer to EMP 144
EMP 147	Disturbed areas will be stabilised through a combination of contouring and slope stabilisation as required.	To minimise erosion of rehabilitated landforms.	Progressively as disturbed areas are no longer required	-	NR	NR	Refer to EMP 144

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 148	All rehabilitation areas will be reshaped and contoured to blend with adjacent relief and drainage as far as practicable. This will include: - the removal of impediments to run-off - diversion of surface run-off around borrow pits to prevent flooding and potential instability of pit walls - where necessary filling of borrow pits with subsoil to level of natural ground surface.	To minimise erosion of rehabilitated landforms.	During the rehabilitation process	-	NR	NR	Refer to EMP 144
EMP 149	All tracks to be rehabilitated will be ripped or scarified to minimise compaction.	To maximise potential for rehabilitation success by allowing roots and water to penetrate the soil profile.	During the rehabilitation process	-	NR	NR	Refer to EMP 144
EMP 150	Remove topsoil from cleared areas and manage in accordance with the Biodiversity and Habitat Management Sub-plan.	To provide a natural source of seed, organic matter and microorganisms for areas to be rehabilitated.	During construction of shared infrastructure	2024.EMP.5a – Area 11 – Sediment traps, drainage and topsoil stockpiles	CLD	-	No shared infrastructure is being constructed. There are topsoil stockpiles in the Area 11 raw materials extraction area.
EMP 151	Ensure material to be used for rehabilitation (e.g. topsoil, cleared vegetation, etc.) does not contain declared weeds.	To maximise potential for rehabilitation success by preventing the introduction and/or spread of declared weeds into rehabilitation areas.	Prior to rehabilitation	-	NR	NR	Refer to EMP 144
EMP 152	Relocate stripped topsoil and (if applicable) cleared vegetation directly to areas required to be rehabilitated, where possible.	To maximise the benefits of using topsoil and mulch by minimising storage time.	During construction of shared infrastructure	-	NR	NR	Refer to EMP 144
EMP 153	Spread stripped topsoil evenly across areas to be rehabilitated (to a nominal depth of approximately 100–150 mm). Work parallel with the contours as far as practicable, to minimise the creation of preferential drainage pathways.	To provide a natural source of seed, organic matter and microorganisms for areas to be rehabilitated.	During rehabilitation process	-	NR	NR	Refer to EMP 144

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 154	Rake rehabilitation areas to minimise potential impacts from compaction.	To maximise potential for rehabilitation success by allowing roots and water to penetrate the soil profile.	After spreading of topsoil and prior to placement of cleared vegetation	-	NR	NR	Refer to EMP 144
EMP 155	Where direct replacement of rehabilitation material (e.g. topsoil, cleared vegetation, etc.) is not possible, stockpile material for later use in rehabilitation activities.	To provide a natural source of seed, organic matter and microorganisms for areas to be rehabilitated.	During construction of shared infrastructure	-	NR	NR	Refer to EMP 144
EMP 156	Locate stockpiles of rehabilitation material (e.g. topsoil, cleared vegetation, etc.) within already disturbed areas wherever possible.	To minimise disturbance.	Ongoing from commencement of ground disturbance	-	NR	NR	Refer to EMP 144
EMP 157	Restrict topsoil stockpile height to less than 2 m.	To conserve native seed banks for direct propagule return, reduce the risk of self-composting and provide opportunities for the roots of temporary vegetation growing on the topsoil stockpile to reach the deepest parts of the stockpile, thereby sustaining many micro-organisms.	Ongoing from commencement of ground disturbance	-	NR	NR	Refer to EMP 144
EMP 158	Where topsoil is not available, import topsoil in consultation with the Department of Parks and Wildlife (DPW) Kununurra office.	To provide a natural source of seed, organic matter and microorganisms for areas to be rehabilitated.	Prior to rehabilitation	-	NR	N/A	Refer to EMP 144
EMP 159	Provide temporary fencing and signage around rehabilitation areas.	To minimise disturbance to rehabilitation areas by restricting access.	During rehabilitation process	-	NR	NR	Refer to EMP 144
EMP 160	Inspect borrow pits no longer required following construction to ensure all pits are backfilled and rehabilitated such that they are free draining.	To ensure timely and appropriate rehabilitation of borrow pits.	As required	-	NR	NR	Refer to EMP 144

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 161	Where there is insufficient subsoil for backfilling: - import material for backfilling in consultation with DPW if applicable, - ensure pits are rehabilitated to minimise standing shallow water as much as possible.	To minimise the creation of mosquito breeding habitat.	As required	Not applicable	NR	NR	Refer to EMP 144

Rehabilitation monitoring regime

Item	Activity and location	Frequency/timing	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 162	Native species richness, density and % cover within rehabilitation sites as outlined in the monitoring procedures.	Twice annually (in May and October).	Mean native species richness, plant density and % cover in the rehabilitation site after five years (including at least two wet seasons where >75% of the long-term average rainfall has fallen) is greater than: 70% of the mean % cover of natives in the reference sites 70% of the mean native species richness in the reference sites.	- Identify cause. - Implement approach to remedy cause, which could include: - application of fertilisers or wetting agents etc. if applicable - implement supplementary direct seeding or seedling planting program in accordance with procedures - review rehabilitation process and amend if appropriate. - Monitor success of approach.	-	NC	NR	<u>Weaber Plain</u> The rehabilitation monitoring regime has not been undertaken for years. DPIRD engaged environmental consultant, Western Environmental, in 2025 to undertake survey of rehabilitation sites and reference sites and report on the success of rehabilitation through assessment against completion criteria. The assessment report was delivered to DPIRD in October 2025. Compliance with the requirements of the rehabilitation monitoring regime will be addressed in the 2025 compliance assessment report with reference to the results reported by Western Environmental. <u>Knox Creek Plain</u> There were no areas requiring or under rehabilitation in the Knox development area or buffer area in 2024.

Item	Activity and location	Frequency/timing	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 163	Indicator species in rehabilitation sites.	Twice annually (in May and October).	As determined in accordance with Table.	1. Identify cause. 2. Implement approach to remedy cause, which could include: • application of fertilisers or wetting agents etc. if applicable • implement supplementary direct seeding or seedling planting program in accordance with procedures. • review rehabilitation process and amend if appropriate. 3. Monitor success of approach.	-	NC	NR	Refer to EMP 162
EMP164	Exotic species richness and % cover within rehabilitation sites as outlined in the monitoring procedures.	Twice annually (in May and October).	Exotic flora species: no greater than 10% increase in weed species density/cover/distribution compared to reference sites no Declared Plants present on-site six months following completion of construction. no infested areas as defined in the Weed, Plant Pathogen and Pest Animal Management Sub-plan no local priority areas as defined in the Weed, Plant Pathogen and Pest Animal Management Sub-plan no new weed species present.	1. Identify cause. 2. Identify the weeds, their location and coverage. 3. Implement remedy which could include: • implementing a weed control program • reinforcing management actions in the Weed, Plant Pathogen and Pest Animal Management Sub-plan and Rehabilitation Management Sub-plan. 4. Monitor success of control.	-	NC	NR	Refer to EMP 162

Item	Activity and location	Frequency/timing	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 165	Erosion within and adjacent to rehabilitation sites.	Opportunistic following heavy rainfall events.	Ensure landform is safe and stable with no erosion occurring 18 months after rehabilitation. Reconstructed landform can withstand exceedance of average rainfall occurrences for a period of 10 years.	1. Identify cause of erosion. 2. Consult expert to determine appropriate remedy which may include: - Installing culverts - Installing stormwater diversion structures. 3. Implement remedy. 4. Monitor success of remedy.	-	NC	NR	No significant erosion was observed within or adjacent to rehabilitation sites from opportunistic monitoring.

Aboriginal heritage management actions

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 166	Implement an induction program for personnel and contractors/consultants, and an information package for farm owners/managers, both of which containing information on: - significance of Aboriginal heritage and the potential impacts of the project - procedures to report potential new sites - obligations under the <i>Aboriginal Heritage Act 1972</i> (WA) - requirements for the protection of known Aboriginal sites.	To ensure protection of known sites of Aboriginal heritage significance in accordance with the requirements of the <i>Aboriginal Heritage Act 1972</i> (WA), to improve knowledge of Aboriginal cultural heritage in non-indigenous people associated with the project.	Within one week of personnel commencing work on-site	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025 2024.EMP.166 – Goomig-Knox Management Committee meeting minutes – 12 June 2025	C	C	<u>Weaber Plain</u> There is no evidence that an induction program was being implemented during the 2024 compliance reporting period. However, it is noted that no clearing was undertaken in the Weaber Plain development area in 2024 and known Aboriginal heritage sites are retained in the buffer areas. <u>Knox Creek Plain</u> There is no evidence that an induction program was being implemented during the 2024 compliance reporting period. However, it is noted that: - The approved Knox FPDP retains known heritage sites in the buffer areas. - Satellite imagery shows retention of those areas in accordance with the approved FPDP (see Figure 4 of this report). - Inspection on 16 April 2025 confirmed ORIA98-02 (randomly selected for inspection) remained undisturbed by surrounding development. - The MG Corporation representative attending the Goomig-Knox Management Committee meeting on 12 June 2025 confirmed that sufficient discussions and dialogue between Keep Farming and MG Corporation are occurring satisfying the involvement and engagement requirements of the Aboriginal Cultural Heritage Management Sub-plan. For the above reasons and having regard to the purpose of the management action, this item is assessed as compliant.
EMP 167	Document the location of protected areas on development design plans and make available to planners, agents, contractors, and relevant personnel.	To ensure protection of known sites of Aboriginal heritage significance in accordance with the requirements of the <i>Aboriginal Heritage Act 1972</i> (WA), to improve knowledge of Aboriginal cultural heritage in non-indigenous people associated with the project.	Prior to ground disturbance	Refer to approved Knox FPDP dated September 2025 and superseded FPDP Rev C dated 2019.	CLD	C	<u>Weaber Plain</u> Item assessed as completed in a previous audit period. Refer to McMullen Nolan Group (2013). <u>Knox Creek Plain</u> Buffer areas incorporating Aboriginal sites are shown in the approved FPDP.

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 168	Flag the boundaries of project areas to ensure activities do not intrude into areas where Aboriginal sites are present.		Prior to ground disturbance	-	CLD	C	<u>Weaber Plain</u> Item assessed as completed in a previous audit period. <u>Knox Creek Plain</u> Refer to EMP 166
EMP 169	Place 'No Go' signage along boundaries immediately adjacent to Buffer Areas around protected Aboriginal sites.		Prior to ground disturbance	-	CLD	C	<u>Weaber Plain</u> Item assessed as completed in a previous audit period. <u>Knox Creek Plain</u> Refer to EMP 166
EMP 170	If a suspected heritage site is detected follow procedures as outlined in the Heritage Site Detection Procedure. Potential heritage sites include stone/shell scatters (middens), stone tools, rock paintings and engravings, grinding patches, scar trees, ochre sites/quarries, and skeletal remains.	To ensure protection of previously unrecorded Aboriginal heritage sites detected during construction/clearing activities in accordance with the <i>Aboriginal Heritage Act 1972</i> (WA).	Ongoing from commencement of ground disturbance	-	C	Not assessed	<u>Weaber Plain</u> No clearing was undertaken in the Weaber Plain development area in 2024. <u>Knox Creek Plain</u> There is no evidence available to assess compliance with this item.
EMP 171	Site heritage monitors from MG Corporation issued with a permit under Section 16 of the <i>Aboriginal Heritage Act 1972</i> (WA) will be on-site to monitor clearing and earthworks activities.		Ongoing from commencement of ground disturbance	Not applicable	C	N/A	<u>Weaber Plain</u> No clearing was undertaken in the Weaber Plain development area in 2024. <u>Knox Creek Plain</u> Item not included in Knox EMP
EMP 172	A qualified archaeologist issued with a permit under Section 16 of the <i>Aboriginal Heritage Act 1972</i> (WA) will be available to come to site if a suspected heritage site is uncovered.		As required	Not applicable	C	N/A	<u>Weaber Plain</u> No clearing was undertaken in the Weaber Plain development area in 2024. <u>Knox Creek Plain</u> Item not included in Knox EMP

Item	Action	Purpose	Timing	Evidence	Status Weaber	Status Knox	Comment
EMP 173	The MG Corporation will be briefed on proposed works and work schedules and informed of detailed aspects of the project.	Ensure regular ongoing involvement of the Miriung and Gajerrong people in heritage management throughout the life of the project, in accordance with the OFA and OES.	Prior to ground disturbance	2024.EMP.166 – Goomig-Knox Management Committee meeting minutes – 12 June 2025	C	C	DPIRD re-established the Management Committee under the Ord Development Agreement in June 2024 to reinstate coordinated and ongoing engagement between the Developer, KAI (and Development Partner, Keep Farming), MG Corporation and the state in finalising the Ord Stage 2 development and related matters. The MG Corporation representative at the Goomig-Knox Management Committee meeting on 12 June 2025 confirmed that sufficient discussions and dialogue between Keep Farming and MG Corporation are occurring satisfying the involvement and engagement requirements of the Aboriginal Cultural Heritage Management Sub-plan.
EMP 174	The MG Corporation will be involved in inspections of the Project Area throughout construction (with supporting briefing).		Quarterly and as required	2024.EMP.166 – Goomig-Knox Management Committee meeting minutes – 12 June 2025	C	C	Refer to EMP 173
EMP 175	Meet with MG Corporation to discuss broader issues of Aboriginal cultural heritage and heritage protection in and around the buffer and associated social impact.		Annually and as required	2024.EMP.166 – Goomig-Knox Management Committee meeting minutes – 12 June 2025	C	C	Refer to EMP 173
EMP 176	Establish cultural heritage database with GIS records of site locations in the project area.	Establish and maintain up-to-date records on Aboriginal heritage sites within the project area.	Prior to ground disturbance	Refer to McMullen Nolan Group (2013)	C	N/A	<u>Weaber Plain</u> Refer to McMullen Nolan Group (2013) <u>Knox Creek Plain</u> Item not included in Knox EMP

Aboriginal heritage monitoring regime and corrective actions

Item	Activity and location	Frequency	Target	Corrective action	Evidence	Status Weaber	Status Knox	Comment
EMP 177	Signage or temporary fencing/ tape showing heritage site locations.	Daily during clearing and construction	No disturbance to sites not approved to be disturbed under Section 18 of the <i>Aboriginal Heritage Act 1972</i> (WA).	Report as Environmental Incident and initiate Incident Procedure, including: - stopping work in the vicinity of the boundary investigating the cause of the disturbance - redefining boundaries if due to inadequate boundary marking - rehabilitating vegetation in the area as required in accordance with the Rehabilitation Management Sub-plan - restore the 'site' (e.g. scatters or middens could have been buried, rock art altered, skeletal remains exposed) – develop a remedial plan in consultation with appointed archaeologist and MG Corporation - monitoring the success of remedial action. Consult with the Department of Aboriginal Affairs and MG Corporation to determine actions required to restore the site to its original condition.	2024.EMP.2a – File note of site inspection – Knox – 16 April 2025	C	C	<u>Weaber Plain</u> No clearing was undertaken in the Weaber Plain development area in 2024. <u>Knox Creek Plain</u> The approved Knox FPDP retains known heritage sites in the buffer areas. KAI has previously confirmed the following approach to ensuring that clearing and disturbance is confined to the development area: - Survey of development boundaries by a licensed surveyor (SML Land Surveyors). - Marking of boundaries with star pickets and tape. - Marking of boundary ahead of the dozer. - Clearing of boundaries first. It is further noted that: - Satellite imagery shows retention of buffer areas in accordance with the approved FPDP (see Figure 4 of this report). - Inspection on 16 April 2025 confirmed ORIA98-02 (randomly selected for inspection) remained undisturbed by surrounding development.
EMP 178	Aboriginal monitors to check ground-disturbance work areas.	For each new area to be disturbed.	To identify new sites before clearing occurs.	Refer to Heritage Site Detection Procedure.	Not applicable	C	N/A	<u>Weaber Plain</u> No clearing was undertaken in the Weaber Plain development area in 2024. <u>Knox Creek Plain</u> Item not included in Knox EMP

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