



FORRESTANIA NICKEL PROJECT
SPOTTED QUOLL – COSMIC BOY HAUL ROAD

EPBC APPROVAL (2011/6003)

Compliance Assessment Report

Prepared by: Western Areas Ltd

Prepared for: Department of the Environment.

Date: January 2014

EXECUTIVE SUMMARY

This Compliance Assessment Report (CAR) outlines the current status of compliance of the Western Areas Ltd (Western Areas) owned Spotted Quoll – Cosmic Boy Haul Road (the action) with the implementation conditions set by the Commonwealth Department of Sustainability, Environment, Water, Population and Communities (DSEWPC) in their *Environment Protection and Biodiversity Conservation Act 1999 (EPBC)* assessment approval letter dated the 10th February 2012 (EPBC 2011/6003).

For the reporting period (i.e. 25th April 2012 – 24th April 2013) there have been two known non-compliances with the conditions of approval EPBC 2011/6003. These were that the CAR was not lodged on the Western Areas website within the required timeframe (i.e. before the 24th July 2013) and the results of annual fire monitoring were not reported in the Annual Environmental Reports (AERs) submitted to the Department of Mines and Petroleum (DMP) and the Department of Environment Regulation (DER).

An Audit Table has been developed which summarises compliance with the conditions of EPBC 2011/6003 (see Section 4 of this report).

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1.0 Introduction

The Forrestania Nickel Operations (FNO) are situated approximately 160 kilometres south of Southern Cross and 80 kilometres east of Hyden in the Shire of Kondinin. This is a new mining development by Western Areas Ltd (Western Areas) in an area with a long history of mining and exploration activity. Figure 1 shows the location of the FNP within Western Australia.

At the FNO, Western Areas currently operate the Flying Fox underground nickel mine, Spotted Quoll underground nickel mine, the Cosmic Boy accommodation camp and the Cosmic Boy nickel concentrator. The previously approved Diggers South project currently sits on care and maintenance. Exploration activities continue throughout the Forrestania area.

The Spotted Quoll – Cosmic Boy Haul Road proposal (the action) was assessed by the Department of Sustainability, Environment, Water, Population and Communities or DSEWPC, (which is now the Department of the Environment or DoE), as being a controlled action (EPBC 2011/6003) on the 19th of July 2011 due to the determination by DSEWPC that the action was likely to have a significant impact on “Listed Threatened Species and Communities”.

On the 10th of February 2012, DSEWPC approved the action subject to compliance with ten implementation conditions.

On the 8th March 2012 the action was signed off (Reg# 30654) by the Environmental Division of the Western Australian Department of Mines and Petroleum (DMP).

Ground disturbing activities associated with implementation of the action commenced on the 25th of April 2012.

Figure 2 shows the general layout of the Spotted Quoll – Cosmic Boy Haul Road project.

2.0 Purpose and Scope

EPBC 2011/6003 contains implementation conditions endorsed by the A/g Assistant Secretary Environmental Assessment Branch DSEWPC, by which the project can be implemented. Condition 7 of EPBC 2011/6003 provides details of Compliance Reporting requirements.

Condition 5 states:

Within three months of every 12 month anniversary of the commencement of the action, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any plan(s) as specified in the conditions. These reports must remain on the website for at least 5 years. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published.

3.0 EPBC 2008/4443 Compliance

EPBC 2011/6003 lists 10 implementation conditions for the action. This section of the report compares these conditions with the actions that have been undertaken during project implementation to achieve these so that a measure of compliance can be made.

The reporting period for this Compliance Assessment Report (CAR) is from the 25th of April 2012 to the 24th of April 2013 with the report to have been submitted to the DoE before the 25th of July 2013.

3.1 Condition 1

Statement

Condition 1 of EPBC 2011/6003 relates to the clearing associated with the action and states:

The person taking the action must not clear more than 40.74 hectares (ha) of native vegetation within Mining Leases 77/583, 77/584, 77/586, 77/587, 77588, 77/589, 77/399, Forrestania, WA (Attachment A).

Compliance

Total clearing associated with the construction of the Spotted Quoll to Cosmic Boy Haul Road to date is approximately 37.78 Ha which is well within the total clearing allowance of 40.74 Ha. Disturbance calculations are based on aerial photography analysis.

Compliance has been met for Condition 1 for the reporting period.

3.2 Condition 2

Statement

- a) *Prior to the commencement of construction the person taking the action must enter into an agreement with a recognised research body to fund a research project that will aid in the future persistence of Carnaby's Black-Cockatoo.*
- b) *Prior to the commencement of the research project, the person taking the action must submit to the Department for endorsement, a document detailing the full scope of the research project. The document must include the rationale for the project, expected timeframes for completion and aims of the project.*
- c) *The person taking the action must provide the sum of two hundred thousand dollars (\$200,000) to the recognised research body for the research project, in annual payments of forty thousand dollars (\$40,000) per year. These payments must be made no later than 31 December of each year after the agreement has been entered into. The person taking the action must provide written evidence to the Department that the agreement has been entered into prior to the commencement of construction.*

Compliance

2a): Western Areas entered into an agreement (the agreement) with the Western Australian Museum (the Museum, which is a recognised research body) on the 2nd February 2012 for a 5 year sponsorship of a Carnaby's Black-Cockatoo (*Calyptorhynchus latirostris*) research program. Commencement of construction occurred on the 25th May 2012 which is close to four months after the agreement was signed.

Compliance has been met for Condition 2a and this condition should now be considered complete.

2b): A document outlining the scope of the Carnaby's Cockatoo research project was included with a copy of the Carnaby's Black-Cockatoo Management Plan (CBCMP) which was submitted in the mail to the DSEWPC on the 28th February 2012. Endorsement for the CBCMP was provided by DSEWPC on the 13th April 2012. The research project did not commence until July 2012 when the first sponsorship payment was due.

Compliance has been met for Condition 2b and this condition should now be considered complete.

2c): The agreement requires Western Areas to donate two hundred thousand dollars (\$200,000) to the Museum in forty thousand dollar (\$40,000) annual payments between 2012 and 2016. The first two payments (2012 and 2013) have been paid to the museum with the 2013 payment being receipted by the museum on the 1st of August 2013. A document detailing the agreement between Western Areas and the Museum was supplied with the Carnaby's Black-Cockatoo Management Plan (CBCMP) which was submitted by mail to the DSEWPC on the 28th of February 2012. Endorsement for the CBCMP was provided by DSEWPC on the 13th April 2012. The research project did not commence until July 2012 when the first sponsorship payment was due.

Compliance has been met for Condition 2c for the reporting period.

3.3 Condition 3

Statement

Within six (6) months of completion of the research project outlined in condition 2, the person taking the action must provide the Department with a copy of the final research report in PDF format.

Compliance

The Carnaby's Cockatoo Research Project is due for completion at the end of the financial year (i.e. July) 2017.

Condition 3 is not applicable for the reporting period.

3.4 Condition 4

Statement

To mitigate potential impacts on the Carnaby's Black Cockatoo, the person taking the action must develop a Carnaby's Black-Cockatoo Management Plan. The Carnaby's Black-Cockatoo Management Plan must include:

- *Vegetation clearing protocols, which must ensure that no more than 40.74 ha of remnant native vegetation on site is removed;*
- *Vegetation clearing protocols should construction take place during the breeding season for the Carnaby's Black-Cockatoo;*
- *Timeframes for staging the clearing and construction works;*
- *Details of revegetation/rehabilitation of the haul road to be undertaken upon decommissioning of the mine;*
- *Planting protocols for rehabilitating the haul road, including procedures for maintenance for a period of two years;*
- *Details of the replanting schedule should the survival rate of revegetation plantings be less than 80% after two years;*
- *Measures to be implemented to manage feral animals;*
- *Measures to be implemented to manage the risk of fire in the area;*
- *Roles and responsibilities of contractors, staff and the person taking the action prior to, during and post construction;*
- *Program for reporting and monitoring; and*
- *Timeframes for the implementation and management of the above measures.*

The Carnaby's Black Cockatoo Management Plan must be submitted to the department for approval prior to construction commencing. If the department approves the plan, the approved plan must be implemented.

Compliance

A CBCMP was submitted to DSEWPC on the 5th April 2012 and was approved on the 13th April 2013 which is prior to commencement of construction which occurred on the 25th April 2012.

A compliance assessment summary report has been completed regarding the implementation of the CBCMP for the reporting period and this has been included as Appendix 1 to the CAR.

One minor non-compliance was noted with regard to the implementation of the CBCMP for the reporting period and that was that the results of fire monitoring (annual fuel load assessments) were not reported in the Annual Environmental Reports (AERs) submitted to the Department of Mines and Petroleum (DMP) and the Department of Environment Regulation (DER). However as the CBCMP has been implemented, in the opinion of Western Areas the intent of the CBCMP has been met for the reporting period.

3.5 Condition 5

Statement

Unless otherwise agreed to in writing by the Minister, the person taking the action must publish the management plan referred to in these conditions of approval on their website and make the plan publicly available. The Management Plan must be published on the website within one (1) month of the Management Plan being approved and must remain there for the length of the approval.

Compliance

The CBCMP was published on the Western Areas website within one month of it being approved. A copy of the CBCMP remains on the Western Areas website where it is publicly available.

Compliance has been met for Condition 5 for the reporting period.

3.6 Condition 6

Statement

The person taking the action must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plan required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.

Compliance

Records are kept in hard copy files and on the Western Areas servers for all activities related to or relevant to the approval. Records are available to the DSEWPC (DoE) or an independent auditor on request.

Compliance has been met for Condition 6 for the reporting period.

3.7 Condition 7

Statement

Within three months of every 12 month anniversary of the commencement of the action, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any plan(s) as specified in the conditions. These reports must remain on the website for at least 5 years. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published.

Compliance

The CAR for the reporting period was due to be completed and published on the Western Areas website by the 24th July 2013. However this did not happen due to this requirement being missed in the FNO compliance work schedule. This has now been rectified and it is anticipated that this will not happen again. A CBCMP Summary Report which addresses compliance with the implementation of the CBCMP is attached as Appendix 1 to the CAR.

Western Areas are non-compliant with Condition 7 for the reporting period.

3.8 Condition 8

Statement

If the person taking the action wishes to carry out any activity otherwise than in accordance with the plan(s) as specified in the Conditions, the person taking the action must submit to the Department for the Minister's written approval a revised version of the plan(s). The varied activity shall not commence until the Minister has approved the varied plan(s) in writing. The Minister will not approve a varied plan(s) unless the revised plan would result in an equivalent or improved environmental outcome over time. If the Minister approves the revised plan(s), that plan(s) must be implemented in place of the plan(s) originally approved.

Compliance

There has been no requirement to carry out any activity otherwise than in accordance with the CBCMP for the reporting period.

Condition 8 is not applicable for the reporting period.

3.9 Condition 9

Statement

If the Minister believes that it is necessary or convenient for the better protection of listed threatened species and communities to do so, the Minister may request that the person taking the action make specified revisions to the plan(s) specified in the Conditions and submit the revised plan(s) for the Minister's written approval. The person taking the action must comply with any such request. The revised approved plan(s) must be implemented. Unless the Minister has approved the revised plan(s), then the person taking the action must continue to implement the plan(s) originally approved, as specified in the conditions.

Compliance

There have been no requests from the Minister to revise the CBCMP during the reporting period.

Condition 9 is not applicable for the reporting period.

3.10 Condition 10

Statement

If, at any time after five years from the date of this approval, the person taking the action has not substantially commenced the action, then the person taking the action must not substantially commence the action without the written agreement of the Minister.

Compliance

The action was substantially commenced on the 25th April 2012.

Compliance with Condition 10 has been met and should be considered complete.

4.0 Audit Table Summary

Table 1 summarises compliance with the EPBC 2011/6003 implementation conditions for the reporting period.

Table 1: Summary statement of project compliance with EPBC 2011/6003 implementation conditions

Condition Number	Subject	Compliance met for current reporting period (25 th April 2012 – 24 th April 2013) Yes, No, N/A
1	<i>The person taking the action must not clear more than 40.74 hectares (ha) of native vegetation within Mining Leases 77/583, 77/584, 77/586, 77/587, 77/588, 77/589, 77/399, Forrestania, WA (Attachment A).</i>	Yes.
2	<p>a) <i>Prior to the commencement of construction the person taking the action must enter into an agreement with a recognised research body to fund a research project that will aid in the future persistence of Carnaby's Black-Cockatoo.</i></p> <p>b) <i>Prior to the commencement of the research project, the person taking the action must submit to the Department for endorsement, a document detailing the full scope of the research project. The document must include the rationale for the project, expected timeframes for completion and aims of the project.</i></p> <p>c) <i>The person taking the action must provide the sum of two hundred thousand dollars (\$200,000) to the recognised research body for the research project, in annual payments of forty thousand dollars (\$40,000) per year. These payments must be made no later than 31 December of each year after the agreement has been entered into. The person taking the action must provide written evidence to the Department that the agreement has been entered into prior to the commencement of construction.</i></p>	Yes for part a); Yes for part b); Yes for part c) for the reporting period.
3	<i>Within six (6) months of completion of the research project outlined in condition 2, the person taking the action must provide the Department with a copy of the final research report in PDF format.</i>	Not applicable for the reporting period.
4	<p><i>To mitigate potential impacts on the Carnaby's Black Cockatoo, the person taking the action must develop a Carnaby's Black Cockatoo Management Plan. The Carnaby's Black-Cockatoo Management Plan must include:</i></p> <ul style="list-style-type: none"> <i>• Vegetation clearing protocols, which must ensure that no more than 40.74 ha of remnant native vegetation on site is removed;</i> <i>• Vegetation clearing protocols should construction take place during the breeding season for the Carnaby's Black Cockatoo;</i> <i>• Timeframes for staging the clearing and construction works;</i> <i>• Details of revegetation/rehabilitation of the haul road to be undertaken upon decommissioning of the mine;</i> <i>• Planting protocols for rehabilitating the haul road, including procedures for maintenance for a period of two years;</i> <i>• Details of the replanting schedule should the survival rate of revegetation plantings be less than 80% after two years;</i> <i>• Measures to be implemented to manage feral animals;</i> <i>• Measures to be implemented to manage the risk of fire in the area;</i> <i>• Roles and responsibilities of contractors, staff and the person taking the action prior to, during and post construction;</i> <i>• Program for reporting and monitoring; and</i> <i>• Timeframes for the implementation and management of the above measures.</i> <p><i>The Carnaby's Black Cockatoo Management Plan must be submitted to the department for approval prior to construction commencing. If the department approves the plan, the approved plan must be implemented.</i></p>	<p>Yes to submission and approval of CBCMP.</p> <p>No to implementation. Fire management monitoring (fuel load assessment) results not reported in Annual Environmental Reports as required by CBCMP.</p>
5	<i>Unless otherwise agreed to in writing by the Minister, the person taking the action must publish the management plan referred to in these conditions of approval on their website and make the plan publicly available. The Management Plan must be published on the website within one (1) month of the Management Plan being approved and must remain there for the length of the approval.</i>	Yes.

6	<i>The person taking the action must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plan required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.</i>	Yes.
7	<i>Within three months of every 12 month anniversary of the commencement of the action, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any plan(s) as specified in the conditions. These reports must remain on the website for at least 5 years. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published.</i>	No. CAR was not lodged on the Western Areas website within required timeframe.
8	<i>If the person taking the action wishes to carry out any activity otherwise than in accordance with the plan(s) as specified in the Conditions, the person taking the action must submit to the Department for the Minister's written approval a revised version of the plan(s). The varied activity shall not commence until the Minister has approved the varied plan(s) in writing. The Minister will not approve a varied plan(s) unless the revised plan would result in an equivalent or improved environmental outcome over time. If the Minister approves the revised plan(s), that plan(s) must be implemented in place of the plan(s) originally approved.</i>	Not applicable.
9	<i>If the Minister believes that it is necessary or convenient for the better protection of listed threatened species and communities to do so, the Minister may request that the person taking the action make specified revisions to the plan(s) specified in the Conditions and submit the revised plan(s) for the Minister's written approval. The person taking the action must comply with any such request. The revised approved plan(s) must be implemented. Unless the Minister has approved the revised plan(s), then the person taking the action must continue to implement the plan(s) originally approved, as specified in the conditions.</i>	Not applicable.
10	<i>If, at any time after five years from the date of this approval, the person taking the action has not substantially commenced the action, then the person taking the action must not substantially commence the action without the written agreement of the Minister.</i>	Yes. Project has substantially commenced. Condition should be considered complete.

5.0 Conclusion

This CAR outlines the current status of compliance of the Western Areas Ltd owned Spotted Quoll – Cosmic Boy Haul Road proposal with the implementation conditions set out in EPBC 2011/6003.

For the reporting period (i.e. 25th April 2012 – 24th April 2013) there were 2 non-compliances with the conditions of EPBC 2011/6003. Neither non-compliance has resulted in any material environmental harm.

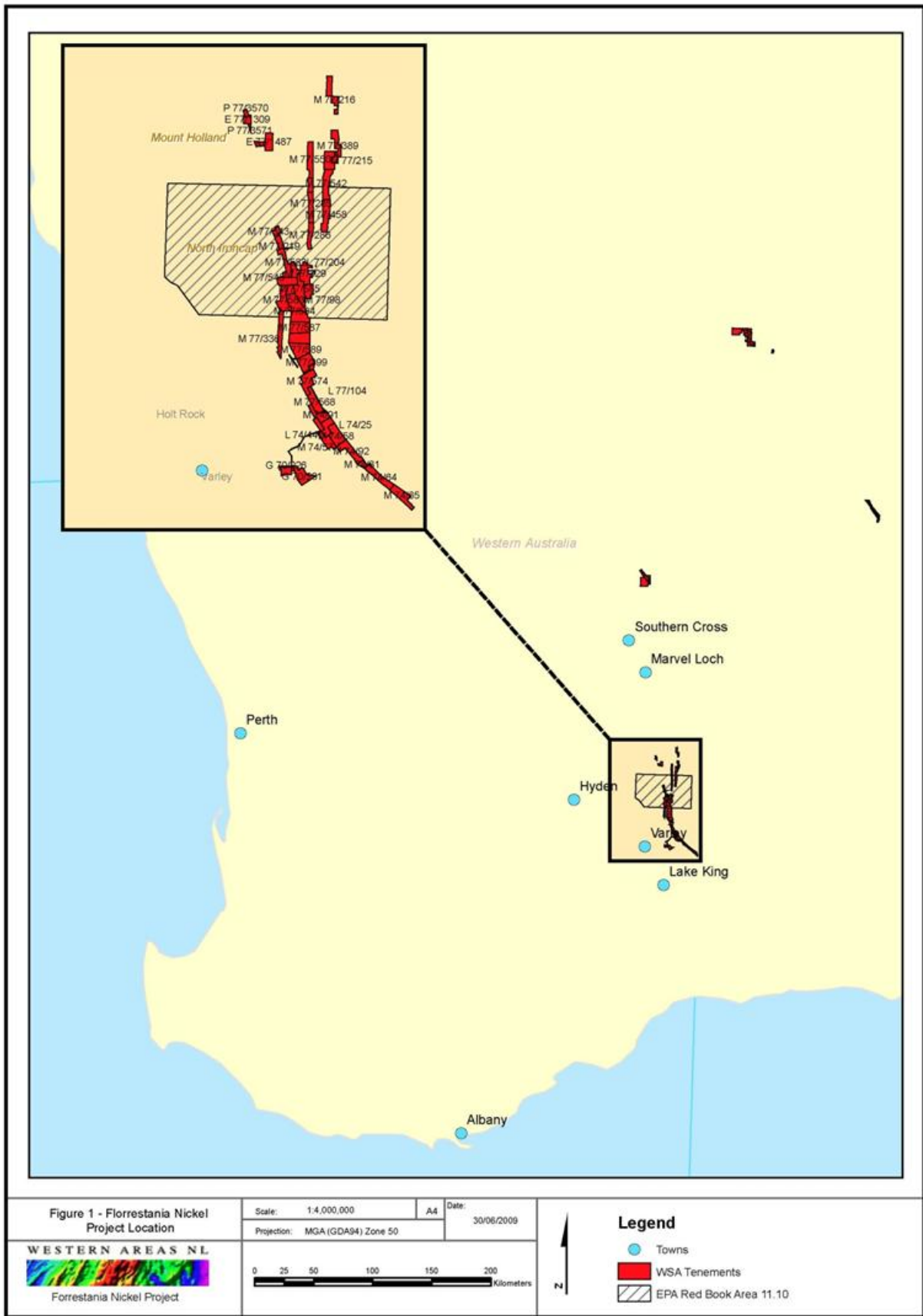
If you have any queries regarding this compliance document please do not hesitate to contact the undersigned.

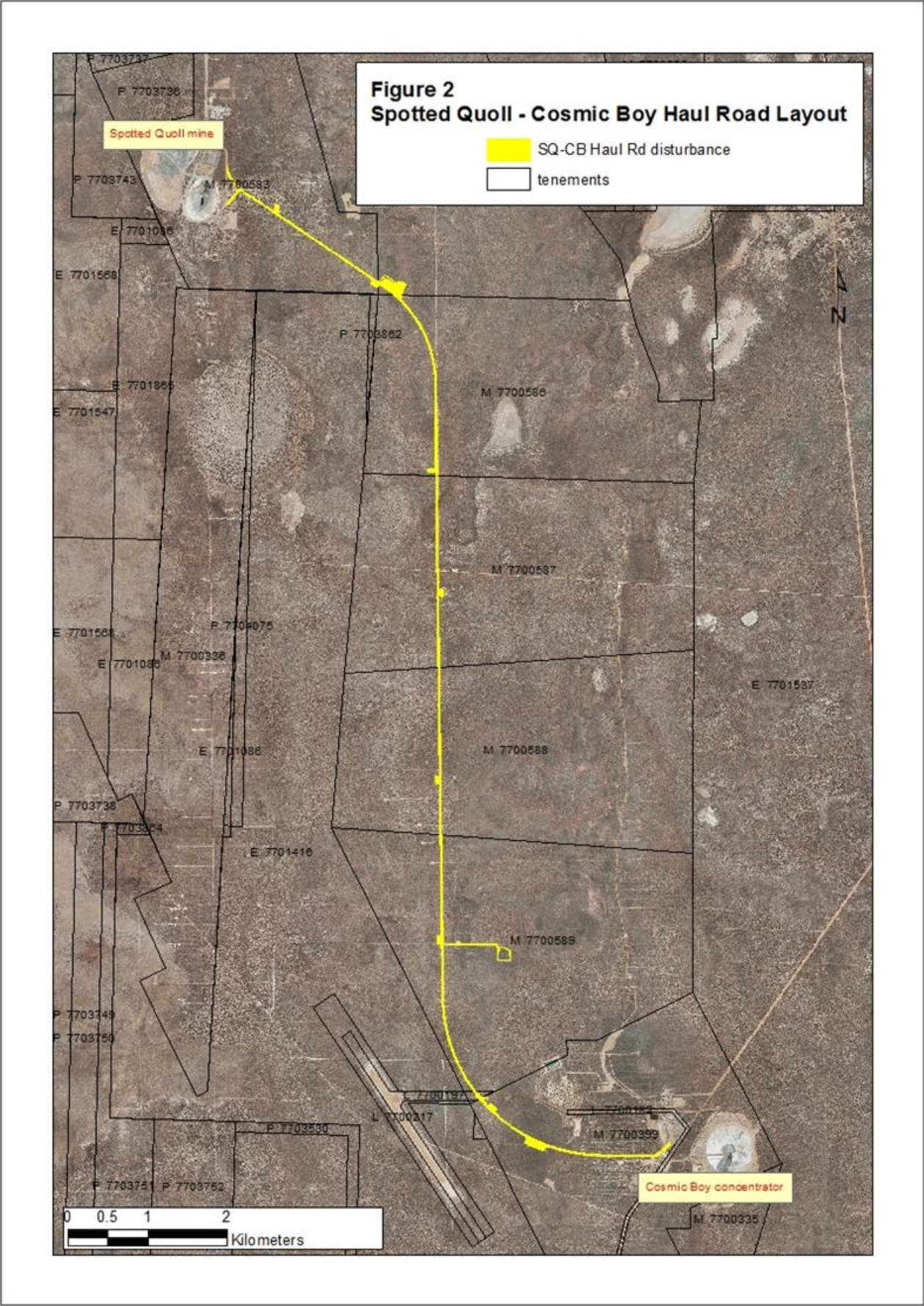
Phil Knapton
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Figures

Figure 1 – Location of Forrestania Nickel Operations in Western Australia

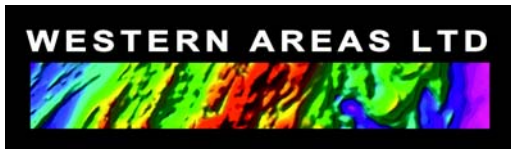
Figure 2 – Spotted Quoll – Cosmic Boy Haul Road proposal – general site layout plan





Appendices

Appendix 1 – Carnaby’s Black-Cockatoo Management Plan compliance assessment summary report



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Appendix 1 – Carnaby’s Black-Cockatoo Management Plan Summary Report: 2012 – 2013

Purpose

This report summarises actions during the previous and current reporting periods to demonstrate compliance with Condition 4 of EPBC 2011/6003.

Condition 4 of EPBC2011/6003 relates to the threatened fauna species *Calyptorhynchus latirostris* (Carnaby’s Black-Cockatoo) and states:

To mitigate potential impacts on the Carnaby’s Black Cockatoo, the person taking the action must develop a Carnaby’s Black Cockatoo Management Plan. The Carnaby’s Black-Cockatoo Management Plan must include:

- *Vegetation clearing protocols, which must ensure that no more than 40.74 ha of remnant native vegetation on site is removed;*
- *Vegetation clearing protocols should construction take place during the breeding season for the Carnaby’s Black Cockatoo;*
- *Timeframes for staging the clearing and construction works;*
- *Details of revegetation/rehabilitation of the haul road to be undertaken upon decommissioning of the mine;*
- *Planting protocols for rehabilitating the haul road, including procedures for maintenance for a period of two years;*
- *Details of the replanting schedule should the survival rate of revegetation plantings be less than 80% after two years;*
- *Measures to be implemented to manage feral animals;*
- *Measures to be implemented to manage the risk of fire in the area;*
- *Roles and responsibilities of contractors, staff and the person taking the action prior to, during and post construction;*
- *Program for reporting and monitoring; and*
- *Timeframes for the implementation and management of the above measures.*

The Carnaby’s Black Cockatoo Management Plan must be submitted to the department for approval prior to construction commencing. If the department approves the plan, the approved plan must be implemented.

Carnaby’s Black-Cockatoo Management Plan Management Actions Compliance

Compliance is discussed in relation to each objective of the approved Carnaby’s Black-Cockatoo Management Plan (CBCMP) in Table 1 as follows:

Table 1: Compliance assessment against objectives of the CBCMP

Management Objective	Management Action	Timing	Responsibility	Compliance assessment	Compliance met for reporting period (25 th April 2012 – 24 th April 2013): Yes, No, N/A
(1) Avoid and minimise impacts on Carnaby's Black-Cockatoo habitat	(1) Disturbance will be in accordance with Forresteria Nickel Project Ground Disturbance Request Procedure (WANL-ENV-PRO-012).	During clearance	Environmental Manager	All clearing undertaken during the project was approved prior to disturbance through the internal Ground Disturbance Request Procedure. Copies are available on file.	Yes
	(2) Ensuring no more than 40.74 ha of remnant native vegetation is removed in the project area.	During clearance	Onsite Environmental Officer	An analysis of the disturbance footprint for the Haul Road from aerial photography shows that only 37.78 Ha was disturbed for establishment of the haul road.	Yes
	(3) Prior to clearing commencing, the haul road will be walked by WANL Environmental staff and areas to be cleared will be well-defined to avoid over clearing.	Prior to clearing	Onsite Environmental Officer	The clearing footprint was flagged by survey and checked by WANL environmental personnel both prior to and following clearing.	Yes
	(4) All clearing will be supervised by the Environmental staff.	During clearing	Onsite Environmental Officer	All clearing activities were checked daily by WANL environmental personnel.	Yes
	(5) During Clearing operations daily 'toolbox' meetings will be held to discuss proposed clearing during the day.	During clearing	Onsite Project Manager	Tool box and/or prestart meetings held daily prior to commencement of the day's activities. Records kept in the daily reports for the project which are kept on file.	Yes
	(6) WANL environmental staff will monitor and record vegetation cleared weekly.	During clearing	Onsite Project Manager	Western Areas environmental personnel inspected the haul road site regularly and vegetation disturbance activities were reported in the daily reports for the project.	Yes
	(7) Restricting traffic to established roads and parking areas so as not to disturb vegetation.	Ongoing	Onsite Project Manager	Dedicated park up areas were established for construction of the project.	Yes
	(8) Induction of employees to ensure disturbance is confined to areas identified clearly in the field.	Ongoing	Onsite Environmental Officer	All staff and contractors undertake both a general site induction and site specific haul road induction prior to commencing work on the project. Induction records kept on file.	Yes
	(9) Areas of vegetation disturbed temporarily during the construction of the haul road will be rehabilitated as soon after construction as	Ongoing	Onsite Environmental Officer	All temporary borrow pits and turn around points not required for ongoing project use have been rehabilitated.	Yes

	practicable.				
	(10) All large trees and stags with hollows will be avoided where possible.	During clearance	Construction personnel	All large trees that could be avoided were flagged and their locations reported to construction personnel. Records kept in daily reports.	Yes
	(11) If clearing is to occur during the breeding season, the following actions will be implemented. (a) Each potential breeding hollow within 400m will be assessed by a suitably qualified environmental professional prior to clearing. (b) WANL environmental staff will create exclusion zones with yellow and black caution flagging tap around any active breeding hollows and prohibit all staff and contractors from entering this area without permission of the WANL environmental staff. (c) Clearing for the project during Carnaby's Black-Cockatoo breeding season will be restricted to those areas of the haul road outside a 400m zone from any potential breeding hollow.	Prior to clearing for (a) and (b). During clearing for (c).	Onsite Environmental Officer	All clearing for the project undertaken between the 25 th April 2012 and approximately the 15 th May 2012 which is outside the breeding season for Carnaby's Cockatoo.	N/A

	(12) All staff and contractors will attend a compulsory environmental induction which will include information on Carnaby's Black-Cockatoo, in particular photos and details on breeding hollows and foraging habitat. Information about the known locations of the species, species management and incidents will be provided to staff and contractors.	Prior to clearing	Onsite Environmental Officer	All staff and contractors undertake both a general site induction and site specific haul road induction prior to commencing work on the project. These induction include a component relating to rare fauna management onsite including Carnaby's Black-Cockatoo. Induction records kept on file.	Yes
	(13) A copy of this management plan to be distributed to staff and contractors working on the construction of the proposed haul road.	Prior to clearing	Environmental Manager	A copy of the CBCMP was made available to the Western Areas project manager and the main construction contractor during construction operations.	Yes
(2) Fire Management	(1) Firebreaks will be constructed and maintained in the project area in accordance with legislative requirements.	Ongoing	Forrestania General Manager	Firebreaks have been established around all buildings in line with legislative requirements. A network of roads has been established as a part of project implementation and these act as firebreaks and as access in the event of a fire.	Yes
	(2) Undertake annual fuel-loading assessments on WANL tenements and consider appropriate management options in consultation with DEC and FESA.	Annually	Onsite Environmental Officer	Staff undertake annual fuel load assessments at selected sites at the Forrestania Nickel Operations. Records are kept on file.	Yes
	(3) Conduct a baseline fuel loading assessment prior to the commencement of the project to determine the background levels of potential fire risks.	Prior to clearing	Onsite Environmental Officer	Staff undertake annual fuel load assessments at selected sites at the Forrestania Nickel Operations. Records are kept on file. An assessment was undertaken along the internal haul route on the 18/11/2011 prior to commencement of construction.	Yes

	(4) As required by state mining legislation, the Forrestania Nickel project will maintain an Emergency Response team trained in Emergency Response which includes the outbreak of fire both on the surface and underground. This team will be deployed where required in the event of an out-break of fire.	Ongoing	Forrestania General Manager	The Emergency Response Team has been established in line with legislative requirements and is active. Training in bushfire and other emergency response is ongoing.	Yes
	(5) Vehicles will be fitted with two-way radios that can also be used in an emergency situation.	Ongoing	Onsite Project Manager	All vehicles used onsite contain either a UHF or VHF radio or both so that communications can be established in an emergency situation.	Yes
	(6) Public bushfire danger warnings from the Bureau of Meteorology will be used to predict the level of bushfire risk within the Project Area.	Ongoing	Onsite Project Manager	Notifications from the Shire of Kondinin and from DFES are received onsite to alert of Total Fire Ban days and when there are Harvest and Total Vehicle Movement Bans in place.	Yes
	(7) Fire management monitoring requirements will be reviewed after the initial 12 months of operation and adjusted if necessary.	Annually	Environmental Manager	A review of the site Fire Management Plan was undertaken in October 2013 and updated as required.	Yes
	(8) All WANL employees and contractors will be required to report any potential fire risks to the site manager via their supervisor.	Ongoing	All site employees and contractors	Site hazard and incident reporting procedures are in place to allow for hazards and incidents to be reported and managed accordingly. Staff are regularly encouraged to report all hazards and incidents during site safety meetings.	Yes
	(9) All records of fire management monitoring kept in accordance with this plan will be summarised in the Annual Environmental Review, which will be submitted to the Department of Mines and Petroleum and DEC.	Ongoing	Environmental Manager	Fire management monitoring records have not been summarised in the Annual Environmental Reports to DMP or DEC (now DER). This will be rectified for the next reporting period.	No
(3) Feral Animal Control	(1) Annual 1080 baiting will occur at strategic locations in the Forrestania region.	Annually	Environmental Manager	1080 baiting is undertaken as required at the FNO by the Eastern Wheatbelt Declared Species Group in accordance with state baiting legislation.	Yes
	(2) Undertake annual trapping for feral cats.	Annually	Onsite Environmental Officer	Trapping for cats is undertaken annually by Western Areas staff.	Yes.

	(3) Food waste will be disposed into local rubbish tips near Cosmic Boy and Spotted Quoll mining areas.	Ongoing	All site employees and contractors	All food waste is disposed in local rubbish tips or in bins that are emptied weekly with waste transported to the local Shire waste transfer station.	Yes.
	(4) Local rubbish tips will be fenced and compacted with soil regularly to limit the availability of edible waste to both feral and native animals.	Ongoing	Forrestania General Manager	Local rubbish tips are managed in accordance with site licensing conditions and the relevant regulations.	Yes.
(4) Monitor Carnaby's Black-Cockatoo populations	(1) Establish a regular monitoring programme for local populations in conjunction with WA Museum research project.	2012	Environmental Manager	The Carnaby's Black-Cockatoo Research Program includes field investigations within the vicinity of the Forrestania area. In addition, onsite staff and contractors are encouraged to report sighting of Carnaby's Black-Cockatoo to site environmental staff. Reported sightings are recorded in a fauna log which is filed on the site server.	Yes.
	(2) Monitoring programme to be undertaken by WA Museum	Annually	Environmental Manager	Staff from the WA Museum including Mr Ron Johnstone and Mr Tony Kirkby undertake all monitoring associated with the Carnaby's Black-Cockatoo research project.	Yes.
(5) Regular review of the Conservation Management Plan	(1) Develop annual reports in accordance with statutory requirements including reports to DSEWPC and DEC.	Annually	Environmental Manager	Compliance assessment report meets the reporting requirements of the CBCMP.	Yes.
	(2) Review Conservation Management Plan	Once every 5 years	Environmental Manager	The review of the CBCMP is due before April 2017.	N/A.

Discussion

One minor non-compliance with the requirements of the CBCMP was noted during the compliance assessment. This was that the results of fire monitoring (fuel load assessments) were not reported in the Annual Environmental Reports (AERs) submitted to the Department of Mines and Petroleum (DMP) and the Department of Environment Regulation (DER) as per the CBCMP commitment (Objective 2, Action 9). However despite this in the opinion of Western Areas the intent of the CBCMP has been met for the reporting period.