



NORTHERN MINERALS

BROWNS RANGE RARE EARTHS PROJECT

Annual Compliance Assessment Report No 1 Ministerial Statement 986

For reporting period from 20 October 2014 to 31 October 2015

Document Number: BR5-EN-RP-300-001

Revision Number: 0

Date: 8 January 2016

Browns Range Rare Earths Project – Compliance Assessment Report No 1

Executive summary

The Browns Range Rare Earths Project was approved under Ministerial Statement 986, issued on 20 October 2014. The project activities assessed by the EPA and approved by the Minister have not yet substantially commenced. No construction, operational activities or other ground disturbing works related to the project occurred during the reporting period (20 October 2014 to 31 October 2015).

This report is the first annual Compliance Assessment Report for the Browns Range Project. The report has been prepared in accordance with a Compliance Assessment Plan prepared by Northern Minerals and approved by the Office of the EPA. This report presents an evaluation of project compliance against twenty-one audit elements, which are described in detail in the approved audit table (Attachment 2 in Appendix A). No non-compliance matters occurred during the reporting period.

This report will be made publicly available, in accordance with the OEPA's Post Assessment Guideline for Making Information Publically Available (OEPA 2012a).

Browns Range Rare Earths Project – Compliance Assessment Report No 1

Contents

1 Introduction 1

2 Project status 2

3 Compliance summary 4

4 Conformance with Conservation Significant Fauna Plan 5

5 References 6

Appendices

Appendix A – Statement of Compliance

1 Introduction

The Browns Range Rare Earths Project is a proposed rare earths mine and mineral processing operation at a location approximately 160 km south-east of Halls Creek, Western Australia. The project will involve both open cut and underground mining, as well as the development of ore processing facilities and a range of support infrastructure, including; access and haulage roads, an accommodation village, an airstrip, a water supply borefield and pipelines, power generation and transmission facilities, and waste storage facilities. Northern Minerals Limited is the project proponent.

The Environmental Protection Authority (EPA) assessed the Browns Range Project through the 'Assessment on Proponent Information' (API) process (EPA Assessment No 1973), culminating in a report and recommendations to the Minister in August 2014 (EPA Report 1523).

The Western Australian Minister for the Environment granted conditional environmental approval of the Browns Range Rare Earths Project under Part IV of the *Environmental Protection Act 1986* through Ministerial Statement 986, issued on 20 October 2014. Condition 4 of the Ministerial Statement imposes conditions related to compliance assessment and reporting. In particular, Condition 4-6 requires the project proponent to submit an annual compliance report:

The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as agreed in writing by the CEO.

This Compliance Assessment Report is the first annual compliance report prepared for the Browns Range Rare Earths Project. It addresses project compliance with requirements of Ministerial Statement 986 during the reporting period from 20 October 2014 to 31 October 2015. Throughout this report the term "the reporting period" refers to activities and conditions during the period from 20 October 2014 to 31 October 2015.

This report and attached supporting documentation have been prepared in accordance with the approved Compliance Assessment Plan for the Browns Range Project and relevant Office of the Environmental Protection Authority (OEPA) post-assessment guidelines, including (but not limited to) the *Post Assessment Guideline for Preparing a Compliance Assessment Report* (PAG3, 2012d).

2 Project status

Implementation of the Browns Range Project has not yet substantially commenced. No ground-disturbing works authorised under Ministerial Statement 986 have been carried out. Applications for a range of subordinate environmental (and related) approvals were sought during the reporting period. The status of the applications lodged during the reporting period is summarised in Table 1.

Table 1: Status of subordinate approvals for Browns Range Project

Environmental aspect / matter regulated	Relevant legislation	Authorisation required	Current status	Administering agency
<p>Prescribed premises categories:</p> <p>(5) (a) processing or beneficiation of metallic or non-metallic ore (b) tailings are tailings or residue from metallic or non-metallic ore are discharged into a containment cell or dam.</p> <p>(6) Mine dewatering: premises on which water is extracted and discharged into the environment.</p> <p>(52) Electrical power generation (fuel other than natural gas) >10 MW.</p> <p>(54) Sewage treatment facility (>100m³/day)</p> <p>(64) Class II or III putrescible landfill site (>20 tpa)</p> <p>(73) Bulk storage of chemicals etc (storage of which acids, alkalis or chemicals that —</p> <p>(a) contain at least one carbon to carbon bond; and</p> <p>(b) are liquid at STP (standard temperature and pressure).</p>	<i>Environmental Protection Act 1986</i>	Works approval and licence or registration under Part V of the EP Act.	<p>Works approval for construction and commissioning of a sewage treatment facility and a Class II landfill was granted on 24 September 2015 (W5837/2015/1).</p> <p>Works approval application has not yet been submitted for Category 5, 6, 52 or 73 prescribed premises.</p> <p>No activities that would trigger a requirement for a Part V works approval or licence were implemented during the reporting period.</p>	Department of Environment Regulation (DER)
"Taking" of protected flora / fauna	<i>Wildlife Conservation Act 1950</i>	Permit to take native fauna	Northern Minerals has committed to applying for a permit to take fauna as part of the Conservation Significant Fauna Management Plan required under	DER

Environmental aspect / matter regulated	Relevant legislation	Authorisation required	Current status	Administering agency
			Condition 6 of Ministerial Statement 986. On the advice of DPAW, Northern Minerals will defer applying for the permit to take until ~2 to 3 months prior to the commencement of construction.	
Taking groundwater or surface water	<i>Rights in Water and Irrigation Act 1914</i>	Section 5C licence	A 5C licence to take up to 790,000 kLpa of water (GWL177452 (3)) was granted on 14 Oct 2015. Water will be sourced from bores previously constructed under permit CAW189465(1), issued on 22 November 2013.	DoW
Accessing or disturbing culturally significant land.	<i>Aboriginal Heritage Act 1972</i>	Section 18 permit	Ethnographic heritage surveys were completed over the whole of the development envelope in August 2015. No culturally significant features were identified within the proposed disturbance areas.	Department of Aboriginal Affairs (DAA)

3 Compliance summary

No non-compliance matters arose during the reporting period. A “Statement of Compliance” (post-assessment form 2) is provided in Appendix A. An updated audit table is provided in Appendix A, Attachment 2.

Of the twenty-one individual audit elements in the approved audit table for the Browns Range Project, thirteen were assigned a compliance status of “not required”, meaning that the requirements of the audit element were not triggered during the reporting period. This largely reflects the fact that the project has not yet substantially commenced. Six audit elements were assigned a compliance status of “compliant”. Two audit elements (M4-1 and M4-2, relating to compliance reporting) were assigned an audit status of “completed”. Details of the compliance status of each audit element are present in the audit table (Attachment 2, Appendix A). Documentary evidence in support of the elements assigned a “compliant” or “completed” audit has been retained by Northern Minerals and is available for inspection by the Office of the EPA.

4 Conformance with Conservation Significant Fauna Plan

The requirement to implement Ministerial Conditions 6-1 through 6-9, which relate actions set out in Northern Minerals Conservation Significant Fauna Management Plan (CSFMP) has not yet been triggered, as the project has not substantially commenced. A draft CSFMP was prepared by Northern Minerals in November 2014 and submitted to the Department of Parks and Wildlife (DPAW) for review and comment. DPAW provided feedback in late December 2014.

Northern Minerals subsequently consulted with DPAW about the appropriate timing for seeking a permit to take fauna, as a precautionary measure in the event that pre-construction surveys would encounter protected fauna which might require relocation. DPAW advised that it would be appropriate to apply for a permit approximately 2 months prior to the planned pre-construction fauna surveys. No construction occurred during the reporting period and no pre-construction fauna surveys were carried out.

5 References

Northern Minerals Limited (2016). Browns Range Rare Earths Project – Compliance Assessment Plan, Ministerial Statement 986, Revision 1, 4 January 2016.

Office of the Environmental Protection Authority (2012a) Post Assessment Guideline for Preparing a Compliance Assessment Plan

Office of the Environmental Protection Authority (2012b) Post Assessment Guideline for Preparing an Audit Table

Office of the Environmental Protection Authority (2012c) Post Assessment Guideline for Making Information Publicly Available

Office of the Environmental Protection Authority (2012d) Post Assessment Guideline for Preparing a Compliance Assessment Report

Appendix A – Statement of Compliance (post-assessment Form 2)

Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	<i>Browns Range Rare Earths Project</i>
Statement Number	986
Proponent Name	<i>Northern Minerals Limited</i>
Proponent's Australian Company Number (where relevant)	119 966 353

2. Statement of Compliance Details

Reporting Period	20/10/14 to 31/10/15
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Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input checked="" type="checkbox"/>	Construction	<input type="checkbox"/>	Operation	<input type="checkbox"/>	Decommissioning	<input type="checkbox"/>

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	2
<p>An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table has been prepared and maintained in accordance with the Office of the Environmental Protection Authority's (OEPA) <i>Post Assessment Guideline for Preparing an Audit Table</i>, as amended from time to time and is consistent with the Compliance Assessment Plan approved for the Browns Range Project. The 'Status Column' of the audit table accurately describes the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms used in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.</p>	

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)			
No (please proceed to Section 3)	<input type="checkbox"/>	Yes (please proceed to Section 4)	<input checked="" type="checkbox"/>

Appendix A – Statement of Compliance (post-assessment Form 2)

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

The information required Section 3 must be provided for each non-compliance or potential non-compliance identified during the reporting period covered by this Statement of Compliance.

Non-compliance/potential non-compliance 5-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
Was this non-compliance or potential non-compliance reported to the General Manager, OEPA?	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to OEPA verbally Date _____ <input type="checkbox"/> Reported to OEPA in writing Date _____	<input type="checkbox"/> No
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?	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
What was the cause(s) of the non-compliance or potential non-compliance?	
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?	
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?	
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:	
<ul style="list-style-type: none"> 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. (the above information may be provided as an attachment to this Statement of Compliance)	

Appendix A – Statement of Compliance (post-assessment Form 2)

4. Proponent Declaration

I, Robin Spencer Jones, Project Manager, declare that I am authorised on behalf of Northern Minerals Limited (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: 8 January 2016

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 General Manager of the OEPA 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.

5. Submission of Statement of Compliance

One hard copy and one electronic copy (preferably PDF on CD or thumb drive) of the Statement of Compliance are required to be submitted to the General Manager, OEPA, marked to the attention of Manager, Compliance Branch.

Please note, the OEPA has adopted a procedure of providing written acknowledgment of receipt of all Statements of Compliance submitted by the proponent, however, the OEPA does not approve Statements of Compliance.

6. Contact Information

Queries regarding Statements of Compliance, or other issues of compliance relevant to a Statement may be directed to Compliance Branch, OEPA:

Manager, Compliance Branch

Office of the Environmental Protection Authority

Postal Address: Locked Bag 10
EAST PERTH WA 6892

Phone: (08) 6145 0800

Email: compliance@epa.wa.gov.au

ATTACHMENT 1

Table 2 Compliance Status Terms

Compliance Status Terms	Abbrev	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: <ul style="list-style-type: none"> ongoing requirements that have been met during the reporting period; and requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: <ul style="list-style-type: none"> audit elements have a finite period of application (e.g. construction activities, development of a document); the action has been satisfactorily completed; and the Office of the Environmental Protection Authority (OEPA) has provided written acceptance of 'completed' status for the audit element.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.

Attachment 1 – Compliance status terms

In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the OEPA or another government agency for approval, that submission has been made and no further information or changes have been requested by the OEPA or the other government agency and assessment by the OEPA or other government agency for approval is still pending.	<p>The term ‘In Process’ may not be used for any purpose other than that stated in the Definition Column.</p> <p>The term ‘In Process’ may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).</p>
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Attachment 2 - AUDIT TABLE

Statement Compliance Section

PROJECT: BROWNS RANGE RARE EARTHS PROJECT

STATEMENT 986

Note:

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the Minister's Statement for full detail/precise wording of individual elements.
- Code prefixes: M = Minister's condition, P = Proponent's commitment.
- Acronyms list: CEO = Chief Executive Officer of OEPA; DEC = Department of Environment Regulation; DPAW = Department of Parks and Wildlife; DIA = Department of Indigenous Affairs; DMP = Department of Mining and Petroleum; EPA = Environmental Protection Authority; DoH = Department of Health; DoW = Department of Water, Minister for Env = Minister for the Environment; OEPA = Office of the Environmental Protection Authority.
- Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non – compliant, NR = Not Required at this stage. Please note the terms VR = Verification Required and IP = In Process are only for OEPA use.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status
986:M1.1	Proposal Implementation	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 in Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.	An annual compliance report, including information on the extent and location of land disturbance and rehabilitation will be submitted as part of the Annual Environmental Review and Compliance Assessment Report (CAR) with the first CAR being in January 2016.	This report.	Overall	Ongoing	C
986: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 twenty eight (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.	Changes to the name, physical address or postal address of the Browns Range Project proponent will be notified in writing by registered post to the Chief Executive Officer of the Department of the Public Service of the State responsible for the administration of section 48 of the Environmental Protection Act 1986, or her/his delegate within 28 days of the change	Proponent details have not changed during the reporting period.	Overall	Within 28 days of such change	NR
986:M3.1	Time Limit for Proposal Implementation	The proponent shall not commence implementation of the proposal after the expiration of five (5) years from the date of this Statement, and any commencement, within this five (5) year period, must be substantial.	Letter confirming substantial commencement to be provided to the CEO within 5 years of date of Ministerial Statement.	Project has not yet substantially commenced (as at 31 December 2015).	Construction	Prior to 20 October 2019	NR
986:M3.2	Time Limit for Proposal Implementation	Any commencement of implementation of the proposal, within five (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 five (5) years from the date of this Statement.	Letter confirming substantial commencement to be provided to the CEO within 5 years of date of Ministerial Statement.	Project has not yet substantially commenced (as at 31 December 2015).	Construction	Prior to 20 October 2019	NR
986:M4.1	Compliance Reporting	The proponent shall prepare, submit and maintain a Compliance Assessment Plan to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation, whichever is sooner.	Documented Compliance Assessment Plan to be submitted to the CEO Prior to the commencement of ground disturbing works and no later than 20 July 2015, whichever is earlier.	Draft CAP was submitted to OEPA on 5 March 2015. Revised CAP was submitted on 4 January 2016. The CAP was formally approved by the OEPA on 5 January 2016.	Pre-construction	Prior to the commencement of ground disturbing works and no later than 20 July 2015, whichever is earlier.	CLD
986:M4.2	Compliance Reporting	The Compliance Assessment Plan shall indicate: 1.the frequency of compliance reporting 2.the approach and timing of compliance assessments; 3.the retention of	A Compliance Assessment Plan satisfying the requirements of audit element 4-2 must be submitted to the CEO.	Draft CAP was submitted to OEPA on 5 March 2015 and OEPA comments were received on 12	Overall	Prior to the commencement of ground disturbing works	CLD



Attachment 2 - AUDIT TABLE

Statement Compliance Section
PROJECT: BROWNS RANGE RARE EARTHS PROJECT

STATEMENT 986

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status
		compliance assessments; 4.the method of reporting of potential non-compliances and corrective actions taken; 5.the table of contents of Compliance Assessment Reports; and public availability of Compliance Assessment Reports.		March 2015. Revised CAP was submitted on 4 January 2016. The CAP was formally approved by the OEPA on 5 January 2016.		and no later than 20 July 2015, whichever is earlier.	
986:M4.3	Compliance Reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2 the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.	Proponent to assess compliance with each audit element in this table at least annually.	This report.	Overall	Annually	C
986: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.	All annual audit reports shall be retained in hard copy and electronic format, in the manner specified under Northern Minerals' HSE system standards. Copies of reports will be made available to the CEO upon her/his written request.	Copy of this compliance assessment report and supporting audit evidence has been retained by Northern Minerals.	Overall	Ongoing	C
986:M4.5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within fourteen (14) days of that non-compliance being known.	Validated compliance assessment report and incident report (if relevant)	No non-compliance matters have been identified during the reporting period.	Overall	Within fourteen days of the non-compliance being known.	NR
986:M4.6	Compliance Reporting	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as agreed in writing by the CEO. The Compliance Assessment Report shall: 1.be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf; 2.include a statement as to whether the proponent has complied with the conditions; 3.identify all potential non-compliances and describe corrective and preventative actions taken; 4.be made publicly available in accordance with the approved Compliance Assessment Plan; and 5.indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1.	Submit annual compliance assessment reports which 1) are endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf; 2) include a statement of compliance; 3) identify all potential non-compliances and associated corrective/ preventative actions; 4) are made publicly available; and 5) describe any proposed changes to the compliance assessment plan.	This report.	Overall	First compliance report to be submitted no later than 20 January 2016 and thereafter on an annual basis by 1 March each year.	C
986:M5.1	Public Availability of Data	Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)) relevant to the assessment of this proposal and implementation of this Statement.	Validated data and information relevant to the implementation of the Browns Range Project will be made publicly available in accordance with the requirements of Post Assessment Guideline No 4 - Making Information Publicly Available (OEPA, August 2012).	One request for information was received during the reporting period. A representative of the WA Museum requested "access to any parabathynellid crustacean (stygo fauna) specimens and relevant associated data (e.g. molecular sequence data, GPS coordinates for sites from which specimens were collected)..." on 29	Overall	Information to be made available within seven days of receiving written request.	C



Attachment 2 - AUDIT TABLE

Statement Compliance Section
PROJECT: BROWNS RANGE RARE EARTHS PROJECT

STATEMENT 986

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status
				October 2014. Northern Minerals responded to the request for information on 3 November 2014. Northern Minerals also supplied information on subterranean fauna to a postgraduate student at Edith Cowan University who requested access to information as input to her PhD studies.			
986:M5.2	Public Availability of Data	If any data referred to in condition 5-1 contains particulars of: 1. a secret formula or process; or 2.confidential commercially sensitive information; the proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.	If Northern Minerals proposes to decline a request for information on the basis that the information relates to a secret process or formula or is otherwise commercially sensitive information, it will submit a request to the CEO within seven days of receiving a request for the information, providing an explanation and reasons why the data should not be made publicly available.	No requests for information have been declined.	Overall	Information to be made available within seven days of receiving written request.	NR
986:M6.1	Terrestrial Vertebrate Fauna	The proponent shall ensure construction and operational activities of the proposal are carried out in a manner that minimises impacts to conservation significant species of terrestrial vertebrate fauna.	Construction and operational activities will be carried out in compliance with an approved Conservation Significant Fauna Management Plan (CSFMP). Northern Minerals to prepare a Conservation Significant Fauna Management Plan in consultation with the Department of Parks and Wildlife (DPAW)	No construction or operational activities were implemented during the reporting period.	Overall	Ongoing	NR
986:M6.2	Terrestrial Vertebrate Fauna	Prior to the commencement of ground-disturbing activities, the proponent shall prepare a Conservation Significant Fauna Management Plan in consultation with the Department of Parks and Wildlife to the requirements of the CEO to demonstrate condition 6-1 has been met. The Conservation Significant Fauna Management Plan shall include: 1.details of a survey to be undertaken prior to clearing, to identify any conservation significant fauna that may have moved into disturbance areas prior to construction; 2.protocols and procedures to monitor conservation significant fauna, identified by the survey required by condition 6-2(1), during construction and operation; and 3.detailed contingency responses, including translocation, if monitoring required by condition 6-2(2) identifies conservation significant fauna within areas that could be potentially impacted during construction and operation.	The CSFMP will include: 1) details of surveys / inspections to be carried out prior to clearing; 2) protocols and procedures for monitoring conservation significant fauna (if any) identified by the surveys; 3) detailed contingency responses (including translocation) if monitoring identifies the presence of conservation significant fauna that could be impacted by project construction and operational activities.	A draft Conservation Significant Fauna Management Plan was submitted to the Department of Parks and Wildlife on 1 December 2014 for comment. Comments were received on 29 December 2014. A revised CSFMP (incorporating revisions to reflect DPAW comments) will be submitted to DPAW and OEPA at least 2 months prior to the commencement of ground-disturbing activities.	Pre-construction	Prior to the commencement of ground disturbing works.	C
986:M6.3	Terrestrial Vertebrate Fauna	After receiving notice in writing from the CEO that the Conservation Significant Fauna Management Plan satisfies the requirements of condition 6-2, the proponent shall undertake the survey identified in condition 6-2(1) in	Construction and operational activities will be carried out in compliance with an approved Conservation Significant Fauna Management Plan (CSFMP)	A final CSFMP has not yet been submitted. No construction or operational activities have been implemented.	Pre-construction	Prior to the commencement of ground-disturbing activities.	NR



Attachment 2 - AUDIT TABLE

Statement Compliance Section

PROJECT: BROWNS RANGE RARE EARTHS PROJECT

STATEMENT 986

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status
		accordance with the Conservation Significant Fauna Management Plan.					
986:M6.4	Terrestrial Vertebrate Fauna	On completion of the survey required by condition 6-2(1) the proponent shall report to the CEO the results of the survey identified in condition 6-2(1).	Results of surveys shall be reported to the CEO	Fauna surveys have not yet been implemented. No construction or operational activities have been implemented	Pre-construction	Within 1 month of completion of the survey, or as required by the CSFMP.	NR
986:M6.5	Terrestrial Vertebrate Fauna	Prior to ground-disturbing activities, the proponent shall implement the management actions in accordance with the requirements of conditions 6-2(2) and 6-2(3).	Northern Minerals will prepare and implement a Conservation Significant Fauna Management Plan to the requirements of the CEO	A final CSFMP has not yet been submitted. No construction or operational activities have been implemented.	Overall	Prior to commencement of ground disturbing activities and as required through construction and operation phases.	NR
986:M6.6	Terrestrial Vertebrate Fauna	The proponent shall continue to implement the management actions in accordance with the Conservation Significant Fauna Management Plan until the CEO has confirmed by notice in writing that it has been demonstrated that the objective in condition 6-1 has been met and therefore the implementation of the management actions is no longer required.	Northern Minerals will implement a Conservation Significant Fauna Management Plan until the CEO has advised that the management actions described in the CSFMP are no longer required.	A final CSFMP has not yet been submitted. No construction or operational activities have been implemented.	Overall	Until notification has been received from the CEO that implementation of the CSFMP is no longer required.	NR
986:M6.7	Terrestrial Vertebrate Fauna	The proponent may review and revise the Conservation Significant Fauna Management Plan.	Northern Minerals may review and revise the CSFMP	A revised CSFMP (incorporating revisions to reflect DPAW comments) will be submitted to DPAW and OEPA at least 2 months prior to the commencement of ground-disturbing activities.	Overall	Ongoing	NR
986:M6.8	Terrestrial Vertebrate Fauna	The proponent shall review and revise the Conservation Significant Fauna Management Plan as and when directed by the CEO.	Northern Minerals will review and revise the Conservation Significant Fauna Management Plan as and when directed by the CEO.	The CEO has not requested revision of the CSFMP.	Overall	When required by the CEO.	NR
986:M6.9	Terrestrial Vertebrate Fauna	The proponent shall implement the latest revision of the Conservation Significant Fauna Management Plan, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 6-2.	Northern Minerals will implement the latest revision Conservation Significant Fauna Management Plan to the requirements of the CEO	A final CSFMP has not yet been submitted. No construction or operational activities have been implemented.	Overall	Until notification has been received from the CEO that implementation of the CSFMP is no longer required.	NR