



**Warrawoona Gold Project
Annual EPBC Compliance Report – 2023-2024
EPBC 2019/8584**

Warrawoona Gold Project: Annual EPBC Compliance Report 2023-2024

Rev	Revision Details	Prepared	Reviewed	Authorised	Date
0	EPBC Compliance Report February 2023 – 2024 Submission to DCCEEW	Zoe Stokes Amy Hutchison	Jayben Lister	Jayben Lister	20/05/2024

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This document has been prepared based on assumptions as reported throughout and upon information and data supplied by others.

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Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed 

Full name (please print) Jayben Lister

Position (please print) Environment and Heritage Manager

Organisation (please print including ABN/ACN if applicable)

Calidus Resources Limited (98 006 640 553)
Keras (Pilbara) Gold Pty Ltd (37 169 795 037)

Date 20/05/2024

1 Introduction

This annual report has been compiled to fulfil the reporting requirements of Calidus Resources Limited's (Calidus) approvals, as listed below.

- Warrawoona Gold Project, Pilbara Region, WA (EPBC 2019/8584)

The Warrawoona Gold Project (EPBC 2019/8584) was approved under Part 9 of the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) on 12 February 2021 and involves the development of the Warrawoona open pit and underground mine site within the Chichester Ranges of the Pilbara region of Western Australia. The first variation to the conditions of EPBC 2019/8584 was approved on the 2 August 2021. A second variation of conditions was approved by DCCEEW on 17 February 2023 namely:

Delete conditions 7, 9, 10, 11, 12, 14, 17, 20 and 39 and substitute with the conditions set out and addressed in **Table 1: Compliance Table for EPBC 2019/8584**.

Revoke conditions 13, 40, 41, 42 and 43.

Compliance for the current reporting period is assessed against the conditions according to variation approved 17 February 2023.

A request for "variation of conditions" to EPBC Controlled Action 2019/8584 was submitted to the DCCEEW in July 2023. This variation is still being assessed by the DCCEEW.

This report fulfils the requirements of condition 33 of EPBC 2019/8584 and is based on the 2023/24 annual reporting period from 27 February 2023 to 27 February 2024.

1.1 WGP Proponent

The Proponent is Calidus Resources Limited. Calidus is also the occupier (the Licensee) for the land within the Prescribed Premises.

Calidus Resources Limited

PO Box 1240, West Perth WA 6872, Australia 6005

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The Calidus contact for information relating to the Annual EPBC Compliance Report is:

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2 Warrawoona Gold Project (EPBC 2019/8584) Compliance Summary

Table 1: Compliance table for EPBC 2019/8584

#	Condition	Evidence	Status
Part A – Conditions specific to the action			
1	To minimise impacts to the Ghost bat, Northern quoll, Pilbara olive python and Pilbara leaf-nosed bat the approval holder must not: <ol style="list-style-type: none"> clear more than 465 ha within the development envelope, including 0.8 ha of rocky breakaway habitat; or clear more than the six temporary refuge sites for bats; or extract more than 1.6 GL per annum of groundwater. 	<p>During the 2023-2024 compliance period</p> <ol style="list-style-type: none"> 88.8ha was cleared within the development envelope. Refer to Appendix I for a map of clearing conducted during the reporting period. To date, 315.95ha has been cleared within the development envelope. (refer to Appendix I) 0.01 hectares of rocky breakaway habitat had been disturbed prior to the commencement of the activity (via exploration works). (refer to Appendix I) No additional temporary refuge sites for bats were cleared. 474,054kL groundwater was extracted within the Development Envelope (refer to Appendix II). 	Compliant
2	To minimise impacts to the Ghost bat, Northern quoll, Pilbara olive python and Pilbara leaf-nosed bat, the approval holder must comply with all requirements of the following conditions of the Western Australian Approval that are consequential for these species: <ol style="list-style-type: none"> Condition 6 (Mining Exclusion Zone); and Condition 7 (Significant Species Management Plan). 	<ol style="list-style-type: none"> Refer to the map in Appendix I; no mining has occurred within the Mining Exclusion Zone. Notice in writing from the CEO of the Western Australian Department of Water and Environmental Regulation (DWER) that the Significant Species Management Plan satisfies the requirements of MS1150 conditions 7-2 and 7-3 was received on 16 September 2020 (refer to Appendix III) A number of exceedances to the limits prescribed in the Significant Species Management Plan were recorded in the reporting period. These included WAD CN limits in the TSF and vibration exceedances at Klondyke Queen (refer to Appendix VII). <p>It should be noted that the vibration exceedances, though reported, were subsequently determined not to be exceedances. The annual Blast Audit provided a detailed recommendation that use of a concrete mounting block for the geophone does not allow</p>	Partially compliant

#	Condition	Evidence	Status
		for accurate recording of blast vibration. The geophone was subsequently relocated directly to base rock at the Klondyke Queen adit entrance. The annual blast audit report was finalised on 24 th January 2024 - Blast It Global Design Process Site Based Audit (refer Appendix IX)	
3	The approval holder must implement the Western Australian Government approved Significant Species Management Plan.	The Significant Species Management Plan (Rev 3.3) continued to be implemented during the compliance period. Refer to the Significant Bat Monitoring Summary (Appendix V) and Significant Species Monitoring: Northern Quoll (Appendix VII).	Compliant
4	The approval holder must notify the Department within 2 business days of requesting any change to the conditions of the Western Australian Approval and within 5 business days of the conditions of the Western Australian Approval being updated or otherwise changed.	Calidus submitted applications on 6 July 2023 for the following variations to both the MS:1150 conditions and conditions of the Controlled Action 2019/8584. <ul style="list-style-type: none"> - Increase throughput from 2.5Mpta to 3Mpta - Disturbance of 7 bat refuges (Addition of the Criterion Adit for disturbance). Assessment is ongoing.	Compliant
5	In the event that monitoring, tests, surveys or investigations indicate exceedance of thresholds specified in the Significant Species Management Plan, the approval holder must provide the Department a copy of the report required by Condition 7-5(5) of the Western Australian Approval at the same time as the report is provided to the Western Australian Government.	Investigations were provided at the same time to both the Western Australian Government (EPA Services) and DCCEEW. Refer to the summary, Non-Compliance Events – March 2023 to February 2024 (Appendix VIII)	Compliant
6	The approval holder must implement all contingency actions and management measures proposed in the report required by Condition 7-5(5) of the Western Australian Approval and within the timeframes recommended in that report.	Investigations were provided at the same time to both the Western Australian Government (EPA Services) and DCCEEW. Refer to the summary, Non-Compliance Events – March 2023 to February 2024 (Appendix VIII)	Compliant
7	To avoid and mitigate impacts to the Pilbara leaf-nosed bat and ghost bat the approval holder must, for the period for which the approval has effect, implement the Action Plan for the Management of Significant Bats (APMSB)	The Action Plan for the Management of Significant Bats continues to be implemented. Refer to the Significant Bat Monitoring Summary (Appendix V).	Compliant

#	Condition	Evidence	Status
8	A version of the APMSB that includes the Upper Control Limit and Lower Control Limit triggers and justifications for those triggers must be submitted to the Department before commencement of mining activities at the Klondyke Queen pit.	The APMSB with Upper Control Limit and Lower Control Limit triggers and justifications for those triggers was submitted to the Department on 25 June 2021.	Compliant
9	In the event that the monitoring undertaken as required in the approved APMSB demonstrates either: <ul style="list-style-type: none"> a. that the number of Pilbara leaf-nosed bat roosting within the development envelope has not returned to or remained at baseline roosting numbers; or b. that the microclimate conditions of the Bow Bells roost have not remained at or returned to baseline levels within five years after the cessation of mining activities, the approval holder must construct the artificial roost approved in accordance with the requirements of conditions 15 and 16.	The Action Plan for the Management of Significant Bats continues to be implemented. Refer to the Significant Bat Monitoring Summary (Appendix V).	Compliant
10	<u>Mine Closure Monitoring Strategy</u> To avoid and mitigate impacts to the Pilbara leaf-nosed bat and Ghost bat the approval holder must, no later than 30 August 2023, implement Mine Closure Monitoring Strategy approved by the Minister for approval.	The Mine Closure Monitoring Strategy was approved 9 th February 2024 As the Mine Closure Monitoring Strategy was approved 18 days prior to the end of the EPBC 2019/8584 reporting period, no monitoring activities in accordance with the Strategy were undertaken within this reporting period.	Compliant
11	The approval holder must, prior to cessation of mining activities at the Klondyke Queen pit, submit to the department for approval by the Minister a revised Mine Closure Monitoring Strategy.	Noted	Compliant
12	The approval holder must ensure that there is no standing water in the Klondyke Queen pit: <ul style="list-style-type: none"> a) during mining activities below groundwater level, and b) prior to the approval of the revised Mine Closure Monitoring Strategy specified in condition 11. 	Dewatering in the Klondyke Queen Pit commenced January 2023	Compliant

#	Condition	Evidence	Status
13	REVOKED		
14	<p>If the monitoring undertaken as required in the approved Mine Closure Monitoring Strategy specified in condition 11.</p> <p>a. demonstrates that, without anthropogenic supplementation, the Bow Bells roost will not maintain pre-mining water levels continuously for five consecutive years following the cessation of mining activities at the Klondyke Queen pit, the approval holder must continue anthropogenic supplementation to maintain pre-mining water levels for the period for which the approval has effect;</p> <p>b. fails to demonstrate bats are not drinking from the pit lake; and</p> <p>i. the Klondyke Queen pit lake arsenic concentrations; and/or</p> <p>ii arsenic concentrations in bats sampled in the vicinity of the Klondyke Queen pit lake;</p> <p>have exceeded the management triggers specified in the approved Mine Closure Monitoring Strategy, the approval holder must, within 3 months, submit a Mine Closure Management Strategy for approval by the Minister.</p> <p>If the Minister has not approved the Mine Closure Management Strategy within 3 months of the Mine Closure Management Strategy being submitted for approval, the approval holder must within 9 months of submitting the Mine Closure Management Strategy for approval fill the Klondyke Queen pit lake with solid material so that no standing ground water can or will accumulate in the Klondyke Queen pit.</p>	<p>The Mine Closure Monitoring Strategy was approved 9th February 2024</p> <p>As the Mine Closure Monitoring Strategy was approved 18 days prior to the end of the EPBC 2019/8584 reporting period for which this reports applies, no monitoring activities in accordance with the Strategy were undertaken within this reporting period.</p>	Compliant
15	<p>Artificial Roost</p> <p>The approval holder must submit a design for an artificial roost to the Minister for approval before mining activities in the Klondyke Queen pit reach the groundwater level.</p>	<p>The artificial roost design was submitted to DCCEEW on 16 August 2022. Calidus is currently awaiting feedback.</p> <p>PEOF Presentation to DWER October 2023 regarding artificial habitat.</p>	Compliant
16	<p>The artificial roost design must include:</p> <p>a. the coordinates of the proposed location of the artificial roost within the development envelope;</p>	<p>Dewatering in the Klondyke Queen Pit commenced January 2023</p> <p>The artificial roost design was submitted to DCCEEW on 16 August 2022. Calidus is currently awaiting feedback.</p>	Compliant

#	Condition	Evidence	Status
	<ul style="list-style-type: none"> b. details of the features of the artificial roost that will make it suitable roosting habitat for the Pilbara leaf-nosed bat or ghost bat (including how a microclimate sufficiently matching the baseline data of the microclimate recorded at the Klondyke Queen roost and Bow Bells roost will be provided); and c. the proposed dimensions, which must provide a volume equal to or greater than the impacted roost. 	PEOF Presentation to DWER October 2023 regarding artificial habitat	
17	If the approval holder constructs an artificial roost in accordance with the requirements of condition 9, the approval holder must complete construction of the artificial roost within six months of detecting any exceedance of any requirement specified in conditions 9.a. and 9.b.	<p>The artificial roost design was submitted to DCCEEW on 16 August 2022. Calidus is currently awaiting feedback.</p> <p>PEOF Presentation to DWER October 2023 regarding artificial habitat</p>	Compliant
18	<p>Within 12-months of completing construction of the artificial roost the approval holder must submit to the Department a report signed by an independent suitably qualified field ecologist that includes:</p> <ul style="list-style-type: none"> a. verification, with detailed justification, that the artificial roost provides suitable roosting habitat for Pilbara leafed-nosed bat; b. at least 60 consecutive days of hourly records of the abiotic features inside the artificial roost, including, but not limited to, microclimate that demonstrates the artificial roost is suitable roosting habitat for Pilbara leafed-nosed bat; and c. details, with supporting evidence, of the activity of Pilbara leaf-nosed bat and ghost bat in the artificial roost over the same period. d. The cost of construction of the artificial roost is additional to, and must not be deducted from, contributions to offset funds intended to offset the residual significant impacts to the ghost bat or Pilbara leaf-nosed bat from clearing. 	<p>Dewatering in the Klondyke Queen Pit commenced January 2023</p> <p>The artificial roost design was submitted to DCCEEW on 16 August 2022. Calidus is currently awaiting feedback.</p> <p>PEOF Presentation to DWER October 2023 regarding artificial habitat</p>	Compliant
19	<p><u>Offsets</u></p> <p>To compensate for the residual significant impacts of clearing of up to 465 ha of ghost bat, northern quoll, Pilbara olive python and Pilbara leaf-nosed bat habitat, the approval holder must comply with conditions 20-25 below.</p>	Details of compliance to conditions 20 – 25 are detailed below.	Compliant

#	Condition	Evidence	Status
20	<p>The approval holder must contribute to the Pilbara Environmental Offsets Fund (PEOF). In making the contribution to the PEOF, the approval holder must:</p> <ul style="list-style-type: none"> a. contribute funds towards an offset activity or offset activities that: <ul style="list-style-type: none"> i. is intended to reduce the rate of decline of the ghost bat, northern quoll, Pilbara olive python and Pilbara leaf-nosed bat species; ii. is intended to ensure that a viable population of ghost bat, northern quoll, Pilbara olive python and Pilbara leaf-nosed bat species remains in the Pilbara bioregion; and iii. has specified outcomes and performance indicators; timeframes and milestones for their achievement; sufficient monitoring to detect achievement of performance indicators, milestones and the outcomes; and regular reporting to the approval holder of the outcomes of the monitoring. b. based on evidence of the actual clearing footprint from the date of commencement of the impact to the second 30 June following the commencement of the impact, and then biennially during each subsequent 24 month period ending 30 June, make a payment to the PEOF within 20 business days of receipt of an invoice for payment to the PEOF equivalent to the sum of the following amounts on the date of this approval, by adjustment in accordance with the consumer price index (CPI) from the date of this approval decision until the date on which any payment is made: <ul style="list-style-type: none"> i. at least \$1,542 (excluding GST) for each hectare of ghost bat, northern quoll, Pilbara olive python and Pilbara leaf-nosed bat habitat cleared within the development envelope. c. as an advance payment, prior to commencement of the impact, contribute \$100,000 to the PEOF toward achieving the outcomes set out in condition 20.a. of this approval. This advanced payment is not additional to the annual payments required by condition 20.b. d. submit evidence of each payment made under condition 20.b and 20.c. to the Department within 40 business days of the date of the 	<p>Calidus has submitted the 2022 Impact Reconciliation Report (IRR) to the WA Department of Water and Environmental Regulation (DWER) for approval. Request for Further Information was received on 10 March 2023. A revised IRR was submitted on 18 April 2023. Further comments were received on the datasets on 8 Dec 2023. Calidus are currently working through these queries.</p> <p>The Impact Reconciliation Procedure has been reviewed by EPA Services and have provided feedback to be incorporated into the next revision due in June 2024.</p> <p>Once the 2022 IRR is finalised, DWER will invoice Calidus for the 2022 PEOF contribution. This has not yet occurred.</p> <p>The annual delivery agent report as per condition 20 was due 27 February 2022 but was unable to be compiled due to PEOF factors beyond Calidus' control. The DCCEEW has been notified of this issue and Calidus continues to communicate with state and federal PEOF contacts.</p> <p>Condition 20 was revised on 17 February 2023.</p>	Compliant

#	Condition	Evidence	Status
	<p>payment;</p> <ul style="list-style-type: none"> e. unless otherwise agreed to by the Minister in writing, submit an annual delivery agent report(s) to the Department for each PEOF offset activity that consistent with condition 20(a), funds have been contributed towards. The approval holder must submit the annual delivery agent report(s) every 12-months from the date of the advanced payment required by condition 9(c), or as otherwise agreed to in writing by the Minister. f. write to the Minister, within 10 business days of being aware or having concerns, providing details, that the offset outcomes specified for the PEOF project(s) may not be achieved; and g. on completion of clearing, submit to the Department an impact reconciliation report verified by an independent person. 		
21	<p>If the Minister is reasonably satisfied that there has been, or there is probably going to be, a failure, the Minister may write to the approval holder asking it to provide evidence about whether failure has occurred or is likely to occur and nominating a deadline by which this must be provided.</p>	<p>Not occurred during this reporting period</p>	<p>Compliant</p>
22	<p>If, after considering any information provided by the approval holder by the deadline nominated by the Minister under condition 21 and any other information available to the Minister, the Minister is reasonably satisfied that there has been a failure, the Minister will notify the approval holder of the failure.</p>	<p>Not occurred during this reporting period</p>	<p>Compliant</p>
23	<p>The approval holder must submit for the Minister's approval, within 4 months of being notified by the Minister of a failure, a draft Offset Strategy consistent with the principles of the Environmental Offsets Policy. The approval holder must implement the approved Offset Strategy. The approval holder must commence implementation of the approved Offset Strategy within 2 months of the approval of the draft Offset Strategy by the Minister in writing, or another time as agreed in writing by the Minister.</p>	<p>Not occurred during this reporting period</p>	<p>Compliant</p>

#	Condition	Evidence	Status
24	<p>The draft Offset Strategy to be provided for the Minister’s approval at condition 23, must be a framework for how the residual significant impacts to the ghost bat, northern quoll, Pilbara olive python, or Pilbara leaf-nosed bat will be offset and must detail:</p> <ul style="list-style-type: none"> a. how the strategy will address the outcomes specified under condition 20.a., including the extent to which the outcomes have been addressed prior to any failure; b. how it accounts for relevant approved conservation advices, recovery plans and threat abatement plans; c. the party to be responsible for implementing the proposed offset; d. the location and nature of the proposed offset; e. detailed objectives, outcomes, and timeframes for their achievement; f. budget; g. performance and completion criteria for evaluating conservation or research outcomes; h. has project monitoring (with indicators and measures) that demonstrates achievement of the outcomes, reporting on agreed outputs/offset activities and includes evaluation; i. a description of the potential risks to the successful implementation of each proposed offset (including but not limited to environmental, administrative, financial, and governance risks); j. a description of the measures that will be implemented to mitigate risk associated with each proposed offset and a description of the contingency measures that will be implemented if performance or completion criteria are not met; k. processes to adaptively manage the proposed offset; l. how the proposed offset is consistent with the Environmental Offsets Policy; and m. how the measures will be implemented as part of the Offsets Strategy to ensure they have no detrimental impact on any threatened species listed under the EPBC Act. 	Not required during this reporting period	Compliant

#	Condition	Evidence	Status
25	<p>If the Minister considers that a draft Offset Strategy consistent with the outcomes specified at condition 24, has not been received within 4 months of the approval holder being notified by the Minister of a failure under condition 22, the Minister may notify the approval holder that:</p> <ul style="list-style-type: none"> a. the draft Offset Strategy does not adequately offset the impacts to the Ghost bat, Northern quoll, Pilbara olive python, or Pilbara leaf-nosed bat, and b. it must submit a draft Offset Strategy to the Minister that is suitable for approval. 	Not required during this reporting period	Compliant
26	<p>If, after 60 business days of receiving this notice, the approval holder does not submit a draft Offset Strategy to the Minister that is suitable for approval, the Minister may require the approval holder to do any of the following:</p> <ul style="list-style-type: none"> a. cease any clearing of habitat for the Ghost bat, Northern quoll, Pilbara olive python, or Pilbara leaf-nosed bat; or b. cease taking the action or part of the action. <p>Recommencement of clearing or the action or part of the action, can occur once the Minister agrees in writing that the requirements of condition 24 have been satisfied.</p>	Not required during this reporting period	Compliant
Part B – Standard administrative conditions			
27	<p>Notification of date of commencement of the action</p> <p>The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.</p>	The date of the commencement of the action was 27 February 2021, DCCEEW (formally DAWE) was notified via email on 25 March 2021.	Compliant
28	<p>If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.</p>	The date of the commencement of the action was 27 February 2021.	Compliant

#	Condition	Evidence	Status
29	<p><u>Compliance records</u></p> <p>The approval holder must maintain accurate and complete compliance records.</p>	<p>This compliance document and previous compliance documents are available on the Calidus Resources website:</p> <p>https://www.calidus.com.au/</p> <p>Refer to the Significant Bat Monitoring Summary (Appendix V) and Significant Species Monitoring: Northern Quoll (Appendix VII)</p>	Compliant
30	<p>If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.</p> <p>Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department’s website or through the general media.</p>	<p>No request was made during the reporting period.</p>	Compliant
31	<p>Submission and publication of plans</p> <p>The approval holder must:</p> <ol style="list-style-type: none"> a. submit plans electronically to the Department; b. unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of the date; <ol style="list-style-type: none"> i. of this approval, if the version of the plan to be implemented is specified in these conditions; or ii. that the plan is submitted to the Minister or the Department if the plan does not require the approval of the Minister but was not finalised before the date of this approval; or that the plan was approved by the Minister in writing, if the plan requires the approval of the Minister; c. exclude or redact sensitive ecological data from plans that are to be published on the website or provided to a member of the public; and d. keep plans published on the website until the end date of this approval. 	<p>The following plans are available on the Calidus Resources website:</p> <p>https://www.calidus.com.au/</p> <ul style="list-style-type: none"> • Significant Species Management Plan (SSMP) (Rev 3.3) • Action Plan for the Management of Significant Bats (APMSB) (Rev 2) 	Compliant

#	Condition	Evidence	Status
32	<p>The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under conditions of this approval, is prepared in accordance with the Department’s Guidelines for biological survey and mapped data (2018) and submitted electronically in accordance with the requirements of the Significant Species Management Plan.</p>	<p>Monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under conditions of this approval have been prepared in accordance with the Department’s Guidelines for Biological S urvey and Mapped Data (2018) and has been submitted electronically in accordance with the requirements of the Significant Species Management Plan.</p> <p>Refer to the Significant Bat Monitoring Summary 2023-24 (Appendix V) and Significant Species Monitoring: Northern Quoll (Appendix VII).</p>	Compliant
33	<p><u>Annual compliance reporting</u></p> <p>The approval holder must prepare a compliance report for each 12- month period following the date of commencement of the action, or otherwise as agreed in writing by the Minister. The approval holder must:</p> <ol style="list-style-type: none"> publish each compliance report on the website within 60 business days following the relevant 12-month period; notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication. This notification must include documentary evidence of the date of publication of the compliance report; keep all compliance reports publicly available on the website until this approval expires; exclude or redact sensitive ecological data from compliance reports published on the website; and where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication. Note: Compliance reports may be published on the Department’s website. 	<p>This compliance report is available on the Calidus website: https://www.calidus.com.au/</p> <p>The documents:</p> <ul style="list-style-type: none"> Significant Bat Monitoring Summary 2023-24 (Appendix V); and Significant Species Monitoring: Northern Quoll (Appendix VII) <p>Contain sensitive ecological data and have been excluded from the version published on the Calidus website but have been submitted to the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW).</p>	Compliant

#	Condition	Evidence	Status
34	<p><u>Reporting non-compliance</u></p> <p>The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify:</p> <ul style="list-style-type: none"> a. any condition which is or may be in breach; b. a short description of the incident and/or non-compliance; and c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available. 	<p>Incidents of non-compliance with the conditions; or non-compliance with the commitments made in plans are Appendix VIII - Non-compliance events March 2023 to February 2024</p>	Compliant
35	<p>The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:</p> <ul style="list-style-type: none"> a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; b. the potential impacts of the incident or non-compliance; and c. the method and timing of any remedial action that will be undertaken by the approval holder. 	<p>Incidents of non-compliance with the conditions; or non-compliance with the commitments made in plans are Appendix VIII - Non-compliance events March 2023 to February 2024</p>	Compliant
36	<p>Independent audit</p> <p>The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.</p>	<p>There were no requests for an independent audit during the reporting period.</p>	Compliant

#	Condition	Evidence	Status
37	<p>For each independent audit, the approval holder must:</p> <ul style="list-style-type: none"> a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department; b. only commence the independent audit once the audit criteria have been approved in writing by the Department; and c. submit an audit report to the Department within the timeframe specified in the approved audit criteria. 	<p>There were no requests for an independent audit during the reporting period.</p>	Compliant
38	<p>The approval holder must publish the audit report on the website within 10 business days of receiving the Department’s approval of the audit report and keep the audit report published on the website until the end date of this approval.</p>	<p>There were no requests for an independent audit during the reporting period.</p>	Compliant
39	<p>Revision of action management plans</p> <p>The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister under conditions 7, 10 and 23, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.</p>	<p>No revision occurred of the Significant Species Management Plan (Rev 3.3) or the Action Plan for the Management of Significant Bats (Rev 2) during the compliance period.</p>	Compliant

#	Condition	Evidence	Status
44	<p>Completion of the action</p> <p>Within 20 business days after whichever is the earlier of:</p> <ul style="list-style-type: none"> • the completion of the action, or • 60 business days before the end date of the period for which this approval has effect, <p>the approval holder must notify the Department in writing and provide completion data.</p> <p>If the completion of the action is unlikely to occur before the end date of the period for which the approval has effect, the approval holder must submit to the Department, before the end date of the period for which the approval has effect, a request, in accordance with the requirements of section 145C of the EPBC Act, to extend the period of effect of the approval.</p>	Completion of the action not triggered during reporting period	Compliant

Table 2: Implementation of the Action Plan for the Management of Significant Bats (APMSB)

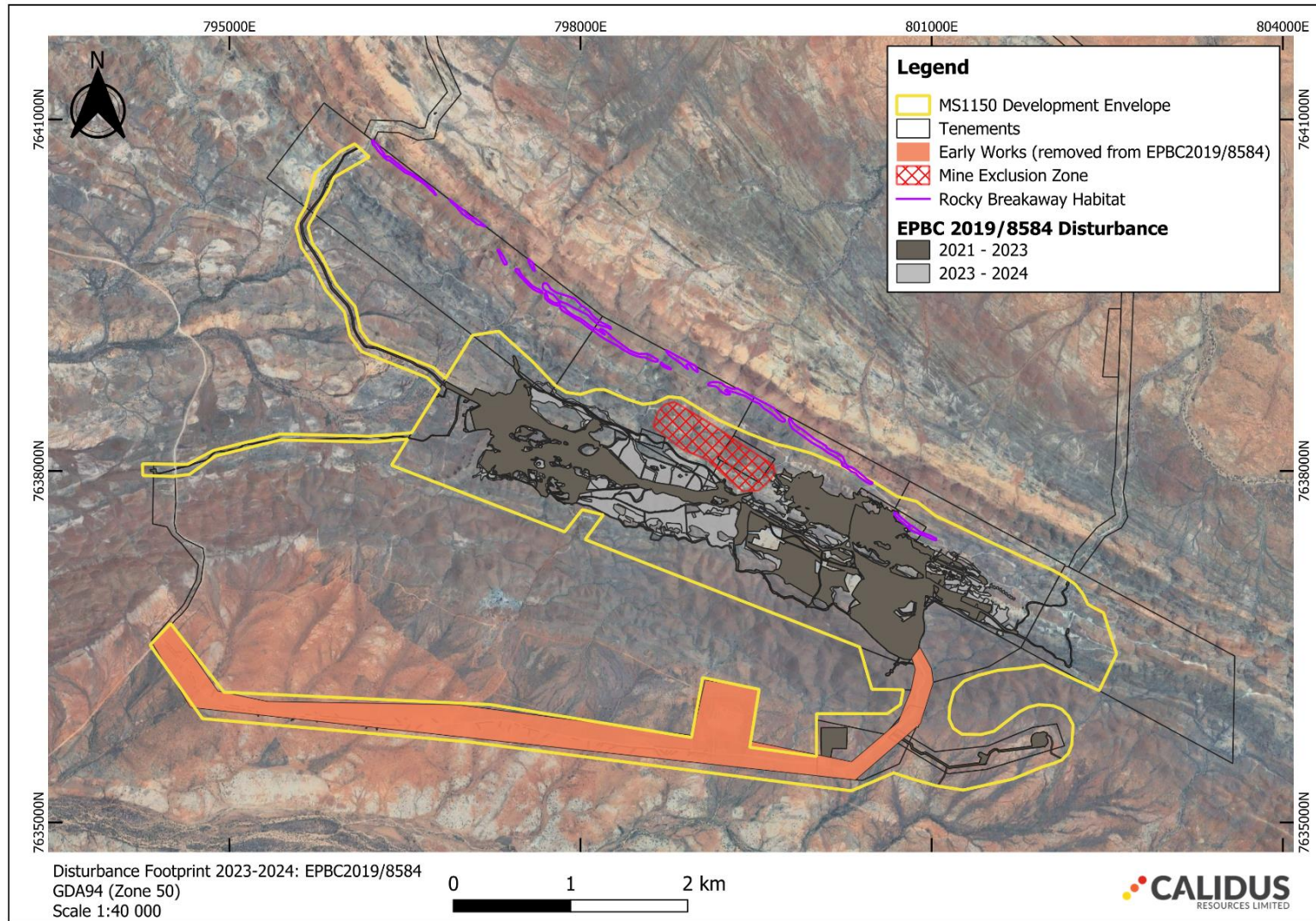
Number	Trigger and threshold	Monitoring and Targets	Evidence	Status
Outcome: Minimise disturbance to Pilbara Leaf-nosed bats as a result of the project.				
Target: No abandonment of Bow Bells South roost by Pilbara Leaf-nosed bats as a result of the project.				
Activity: Dewatering				
1.	<p>Trigger Criteria:</p> <p><u>Humidity</u></p> <p>Percentage humidity records at Bow Bells South workings are not to fall below the baseline average (to be set prior to Klondyke Open pit dewatering activities commencing using baseline data collected up until that time)</p> <p><u>Groundwater Drawdown</u></p> <p>Modelling indicates drawdown cone of depression is approaching the Bow Bells South workings (modelling indicates will not be impacted until Year 4 from commencement of dewatering, if at all) Monitoring bores to be installed between Klondyke Open Pit and Bow Bells South</p> <p><u>Pilbara Leaf-nosed bat Activity</u></p> <p>Bow Bells Pilbara Leaf-nosed bat Activity long-term Lower Control Limit (as per Table 8.1.1)</p>	<p>Humidity levels in the Klondyke Queen and Bow Bells South workings is monitored continuously via HOBO units.</p> <p>Quarterly standing water levels in monitoring bores at Klondyke and near Bow Bells South occurred (minimum quarterly monitoring via manual dipping)</p> <p>The groundwater model will be recalibrated each year once pit dewatering has commenced.</p> <p>Permanent echolocation call detectors (continuous near real time monitoring via SM4 units) recording Pilbara leaf-nosed bat and Ghost bat activity at Bow Bells South and Klondyke Queen. Quarterly interpretation occurs by a Calidus consultant Ecologist.</p> <p>An annual regional survey count is conducted to confirm the entire colony is at Bow Bells South and Klondyke Queen and is not roosting elsewhere.</p> <p>Annual manual count or infra-red camera (census) is used to calibrate SM4 data</p>	<p>Microclimate and Significant Bat Activity Monitoring is detailed in the Significant Bat Monitoring Summary (Appendix V).</p> <p>The conditions within the historic workings of Bow Bells and Klondyke Queen greatly impede the placement of HOBO units however Calidus considers them to be in the best locations possible. Refer to Memorandum – Microclimate monitoring (appendix VI)</p> <p>Dewatering of the main mine area commenced in January 2023.</p> <p>The groundwater model recalibration was completed during the reporting period and will be used to inform future abstraction/dewatering rates.</p> <p>Groundwater data is available in Appendix II</p>	Compliant

Number	Trigger and threshold	Monitoring and Targets	Evidence	Status
Outcome: Minimise disturbance to Klondyke Queen historic workings as a result of the project.				
Performance Indicator: No permanent damage to Klondyke Queen historic workings as a result of the project. Activity: Blasting				
2.	<p>Trigger Criteria:</p> <p><u>Blast Vibration Monitoring</u></p> <p>Vibration limit of greater than 10mms⁻¹ is recorded on the blast vibration monitor at Klondyke Queen</p>	<p><u>Ghost bat Monitoring</u></p> <ol style="list-style-type: none"> Permanent echolocation call detectors recording Ghost bat activity at Klondyke Queen Visual Roost Monitoring via motion cameras during the blasts to determine if there is a Ghost bat response during blasting. <p><u>Blast Monitoring</u></p> <p>Permanent Blast monitoring station at Klondyke Queen to monitor:</p> <ol style="list-style-type: none"> peak particle velocity (PPV – mms⁻¹); and wave form trace. <p><u>Meteorological Monitoring</u></p> <p>To ensure blasts are fired in favorable conditions a weather station located adjacent to Klondyke Queen is monitored for:</p> <ul style="list-style-type: none"> Temperature Wind Speed and Direction <p><u>Structural Monitoring</u></p> <p>Klondyke Queen inspected after blasts within 500m</p> <p><u>Noise Monitoring</u></p> <p>To ensure noise levels within the roost are below 70dB</p>	<p>Noise and Vibration Monitoring and Significant Bat Activity Monitoring: refer to the document titled Significant Bat Monitoring Summary 2023-24 (Appendix V).</p> <p>No exceedances of 70 decibels noise limit.</p> <p>3 exceedances of 10 mms⁻¹ vibration limit:</p> <ul style="list-style-type: none"> 17/08/2023 10.48mm/s 08/12/2023 11.78mm/s 03/01/2024 12.62mm/s <p>It should be noted that the vibration exceedances, though reported, were subsequently determined not to be exceedances. The annual Blast Audit provided a detailed recommendation that use of a concrete mounting block for the geophone does not allow for accurate recording of blast vibration. The geophone was subsequently relocated directly to base rock at the Klondyke Queen adit entrance. The annual blast audit report was finalised on 24th January 2024 - Blast It Global Design Process Site Based Audit (refer Appendix IX)</p> <p>Refer to the Non-compliance events March 2023 to February 2024 (Appendix VIII)</p> <p>Structural Monitoring – post blast inspections occurred for Klondyke Queen adit. No structural deterioration was noted from the inspections.</p>	Non-compliant

3 Supporting Documentation

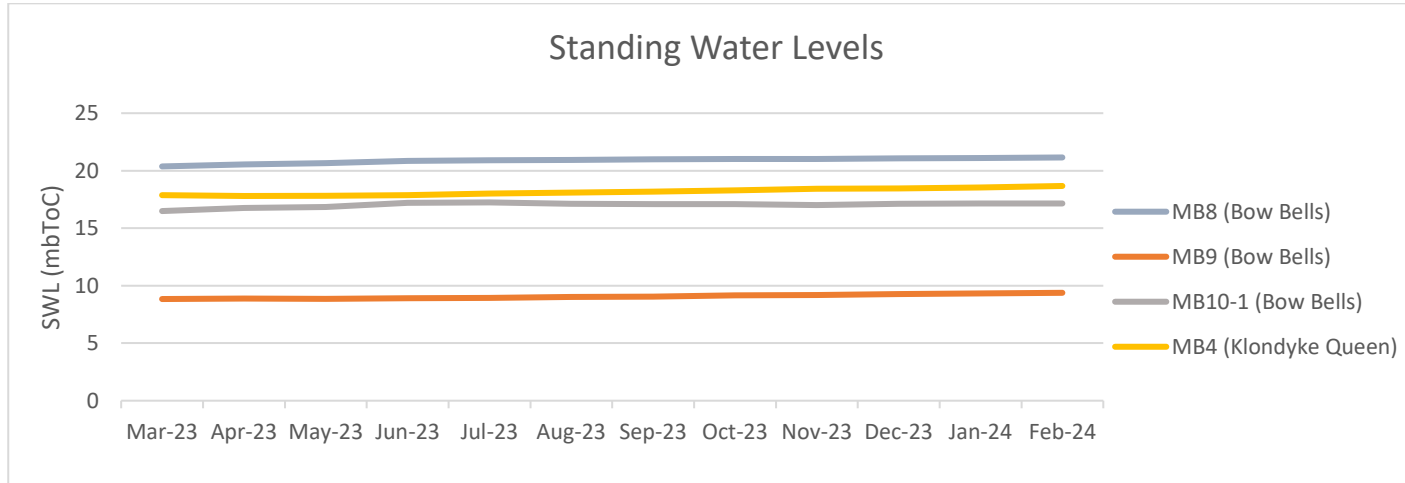
Number	Title	Description
Appendix I	Disturbance Footprint – Warrawoona Gold Project February 2022-2023	Map of clearing conducted for the 2023 – 2024 compliance period
Appendix II	Groundwater Data	Summary of groundwater abstraction for the 2023 – 2024 compliance period
Appendix III	Significant Species Management Plan Approval	Written approval from the Department of Water and Environmental Regulation regarding the Significant Species Management Plan (CRL-ENV-PLN-006).
Appendix IV	Noise and Vibration Data	Downloaded monitoring data from permanent fixed unit February 2023- 2024 (Saros software)
Appendix V	Warrawoona Gold Project Significant Bat Monitoring Summary EPBC 2019/8584 Compliance Period: February 2023 to February 2024	Summary of actions conducted for the 2023 – 2024 compliance period contained in the Significant Bat Summary report.
Appendix VI	Memorandum – Microclimate Monitoring	
Appendix VII	Warrawoona Gold Project: 2023 Significant Species monitoring: Northern Quoll	Annual monitoring of Northern Quoll report conducted by Biologic in July 2023
Appendix VIII	Non-compliance events March 2023 to February 2024	Summary of non-compliance events in
Appendix IX	Annual Blast Audit – Blast It Global Design Process Site Based Audit	Annual Blast Audit conducted by Blast It Global – included audit of noise and vibration monitoring equipment
<p>* Document not published on the Calidus website as it contains Sensitive Ecological Data (as per Sensitive Ecological Data – Access and Management Policy V1.0, Department of the Environment, January 2016, https://www.environment.gov.au/system/files/resources/246e674a-feb1-4399-a678-be9f4b6a6800/files/sensitive-ecological-data-access-mgt-policy.pdf) including locational data of highly desirable, collectable or commercially valuable taxa. All documents identified above have been provided to the DCCEEW, in accordance with relevant reporting requirements</p>		

Appendix I – Disturbance Footprint - Warrawoona Gold Project February 2023-2024



Appendix II – Ground Water Data

Standing Water Levels (SWL) at relevant monitoring bores (meters below top of casing: mbToC)



Bore ID	SWL	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24
MB8 (Bow Bells)	mbToC	20.37	20.55	20.645	20.84	20.9	20.94	20.98	21.01	21.02	21.08	21.1	21.15
MB9 (Bow Bells)	mbToC	8.84	8.88	8.86	8.92	8.93	9.01	9.06	9.15	9.19	9.28	9.32	9.38
MB10-1 (Bow Bells)	mbToC	16.49	16.76	16.83	17.2	17.24	17.12	17.09	17.09	17.01	17.13	17.14	17.16
MB4 (Klondyke Queen)	mbToC	17.86	17.8	17.82	17.88	18.01	18.09	18.19	18.29	18.42	18.45	18.55	18.67

Abstraction volumes March 2023 – February 2024

Bore ID	Units	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Total
PB5	kL	5313	2620	3586	3813	4253	2855	2951	3012	5313	979	2367	2282	474054
PB6	KL	1502	2355	1688	1022	979	2664	2343	1758	2264	793	1838	1960	
PB8	kL	20563	22869	21278	24189	21597	20493	22024	19446	34469	7331	18200	17944	
PB9	KL	6456	6379	6290	5766	5311	4057	3643	3216	4894	1264	2487	2503	
CRA	kL	*	*	*	*	*	*	*	*	*	*	*	*	
PB10	KL	6040	2956	4761	6149	139	*	*	*	*	*	*	*	
DB1	kL	6070	2813	2465	1216	556	3020	3045	2547	4028	1198	1467	2167	
DB2	KL	921	944	984	626	1233	1333	1172	1321	1788	862	1548	1796	
Copenhagen Pit	kL									8189	2176	214	674	
Klondyke Pit	KL		6759	1804	5173	2755	5664	6013	1044	2164	216	623	2242	
Total	kL	46865	47695	42856	47954	36823	40086	41191	32344	63109	14819	28744	31568	

* CRA bore decommissioned, PB10 turned off July 2023

Appendix III- Significant Species Management Plan Approval



Government of Western Australia
Department of Water and Environmental Regulation

Our ref: DWERT 5679
Enquiries: Troy Sinclair, Ph 6364 6425
Email: troy.sinclair@dwer.wa.gov.au

Mr Paul Brennan
Chief Operating Officer
Calidus Resources Limited
Email: paul@calidus.com.au

Dear Mr Brennan

WARRAWOONA GOLD PROJECT - MINISTERIAL STATEMENT 1150 - SIGNIFICANT SPECIES MANAGEMENT PLAN - APPROVED

Thank you for your email of 11 September 2020 submitting the Significant Species Management Plan (CRL-ENV-PLN-006, Rev 3.3, September 2020) to the Department of Water and Environmental Regulation (DWER) for review. This Plan was reviewed by DWER on 11 September 2020.

I note the plan has been prepared to satisfy condition 7-1 of Ministerial Statement 1150 (MS 1150) which states:

7-1 Prior to ground disturbing activities, unless otherwise agreed by the CEO, the proponent shall finalise and submit a revision of the Significant Species Management Plan (CRL-ENV-PLN-006-19 Rev 2, May 2020) in consultation with the agency responsible for the administration of the Biodiversity Conservation Act 2016 (being at the time of this Statement the Department of Biodiversity, Conservation and Attractions). The Significant Species Management Plan shall, when implemented, meet the following environmental objective:

- (1) avoid where possible, and minimise direct and indirect impacts to significant fauna and their habitat, including, but not limited to:
 - (a) Pilbara leaf-nosed bat;*
 - (b) ghost bat;*
 - (c) Pilbara olive python; and*
 - (d) northern quoll.**

I am satisfied with the preparation of the Significant Species Management Plan (CRL-ENV-PLN-006, Rev 3.3, September 2020) and consider the requirements of condition 7.1 of MS 1150 have been met.

Prime House, 8 Davidson Terrace Joondalup Western Australia 6027
Locked Bag 10 Joondalup DC WA 6919
Telephone: 08 6364 7000 Facsimile: 08 6364 7001
www.dwer.wa.gov.au

Please note any changes to the management actions or targets of the Significant Species Management Plan (CRL-ENV-PLN-006, Rev 3.3, September 2020) would require the approval of DWER.

Yours sincerely



Anthony Sutton
EXECUTIVE DIRECTOR
EPA SERVICES

16 September 2020

Appendix IV– Noise and Vibration Data

Appendix V – Significant Bat Monitoring Summary 2023-24

Appendix VII – Warrawoona Gold Project: 2023 Significant Species monitoring: Northern Quoll

Appendix VIII – Non-compliance events - March 2023 to February 2024

Date	Description	Investigation/Outcome
7-May-23	Northern Quoll mortality on haul road	Vehicle impact.
9-Jun-23	WAD CN levels in decant 31.2 mg/L against compliance limit of 30mg/L	Investigation found incorrect sampling methods.
17-Aug-23	Blasting vibration limit of 10mm/s exceedance with 10.48mm/s recorded at 13:00 on 17/08/23 at Klondyke Queen roost following blast in King West.	Investigation found that the K Factor not accurately calculated.
3-Oct-23	WAD CN in supernatant pond(s) in TSF are intermittently exceeding 30 mg/L	<p>Initially reporting October 3rd, 2023. This non-compliance is ongoing with monthly updates provided to DWER and DCCEEW. Since October 3rd, WAD CN levels over the prescribed limit of 30mg/L have been recorded on 127 days. Significant actions undertaken by Calidus to address this non-compliance are listed below:</p> <ul style="list-style-type: none"> - Principle Metallurgist recruited to lead the project of determining the cause of the high WAD CN levels in supernatant water in the TSF. - Multiple external consultants engaged to provide testing guidance and data analysis of those test results - Process pond construction has commenced as the high level of WAD CN in the process water were continually circulating through the plant – this will allow the treatment of WAD-CN from being re-circulated through the plant / tailings. - Hydrogen Peroxide dosing tests of the process water have showed this greatly reduces the WAD CN levels so this will be implemented in the process water pond. - Caros Acid reactor (manufacture) engaged to assist in optimal performance. - Ongoing testing with regard to reagents usage and ratios <p>- No sign of fauna mortality as a result of CN poisoning.</p> <p>These actions are ongoing to resolve the WAD-CN non-compliances and both the DCCEEW and the EPA Services will continue to be updated on progress.</p>
8-Dec-23	Blasting vibration limit of 10 mm/s exceedance with 11.78 mm/s recorded at 08:08 on 8/12/2023 at Klondyke Queen roost following blast in King West.	Audit of blast monitoring equipment determined it was not installed correctly. Concrete mount retains vibration thus not enabling the vibration the KQ roost to be accurately measured. EPBC advised of the audit finding.

Date	Description	Investigation/Outcome
3-Jan-24	Blasting vibration limit of 10 mm/s exceedance with 12.62 mm/s recorded at 12:59 on 3/01/2024 at Klondyke Queen roost following blast in King West.	Audit of blast monitoring equipment determined it was not installed correctly. Concrete mount retains vibration thus not enabling the vibration the KQ roost to be accurately measured. EPBC advised of the audit finding.

Appendix VIII – Annual Blast Audit – Blast It Global Design Process Site Based Audit, 24th January 2024