



OLIVE DOWNS COAL MINE

Annual Compliance Report

Environment Protection and Biodiversity Conservation Act 1999 (Cth)

EPBC Approval Reference: 2017/7867



1. Introduction

1.1 Project Context

Olive Downs Coal Mine (the Project) is a large-scale open-cut metallurgical coal mining operation located in the Bowen Basin, Queensland.

Pembroke Olive Downs Pty Ltd (Pembroke) received EPBC approval under reference 2017/7867 for the Olive Downs Project Mine Site and Access Road. The project activities commenced on 20 April 2022, and the Project entered commercial operations in April 2024. During the reporting period the Project operated across the approved Stage 1 area, with the Stage 2 variation approved on 1 August 2025.

1.2 Project Location

The Project is situated in the Isaac Regional Council area, Bowen Basin, Queensland, east of Moranbah and accessed via Barada Barna Road and the mine access road. Stage 1 and Stage 2 project areas are currently active; Stage 3 and Stage 4 areas are future use areas with perquisite conditions.

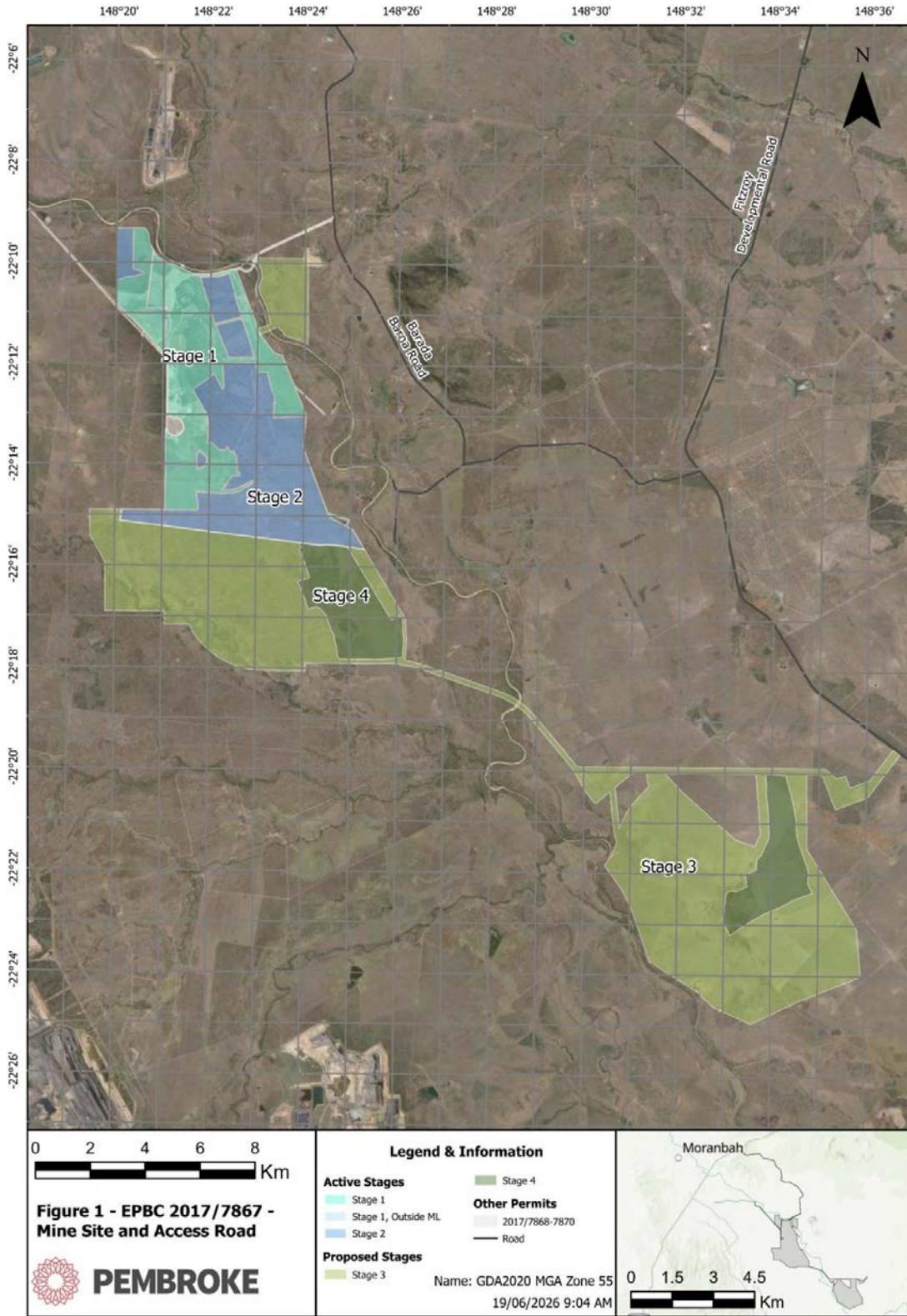


Figure 1 – EPBC 2017/7867 Project Location

1.3 Purpose and Reporting Period

This Annual Compliance Report (ACR) has been prepared by Pembroke to satisfy Condition 72 of EPBC Approval 2017/7867 under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act). The Report covers the 12-month reporting period from **20 April 2025 to 19 April 2026**, representing Year 4 of operations.

Condition 72 sets out the following requirements:

The approval holder must prepare a compliance report for each 12-month period following the date of the commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:

- a. Publish each compliance report on its website within 60 business days following the relevant 12-month period;*
- b. Notify the Department by email that a compliance report has been published on its website within 5 business days the date of publication;*
- c. Keep all compliance reports publicly available on its website for the duration of this approval;*
- d. Exclude or redact sensitive ecological data from compliance reports published on its website; and*
- e. 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.*

The Report, due for publication by 14 July 2026, has been prepared in accordance with the DCCEEW Annual Compliance Report Guidelines (2023). A cross-reference table is provided at Section 3.2. Following submission, this Report will be published on Pembroke's website in accordance with Condition 72(a), with sensitive ecological data excluded per Condition 72(d).

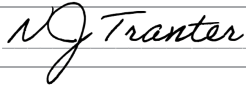
1.4 Approval Holder Details

Organisation	Pembroke Olive Downs Pty Ltd
ABN	53 611 674 376
Project	Olive Downs Coal Mine Site & Access Roads
EPBC Reference	2017/7867
Address	Suite 2, Level 32, 239 George Street, Brisbane, Qld, 4000
Contact Name	Ngaire Tranter, Head of Approvals & Environment
Telephone	07 3177 4940
Email	environment@pembrokeresources.com.au
Website	www.pembrokeresources.com.au

1.5 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) 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 information and documentation supporting this Annual Compliance Report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed	
Full Name	Ngaire Tranter
Position	Head of Approvals & Environment
Organisation	Pembroke Olive Downs Pty Ltd
Date	30 June 2026

2. Description of the Approved Action and Activities

2.1 The Approved Action

The approved action under EPBC 2017/7867 is the construction and operation of Olive Downs Coal Mine. The Project involves open-cut mining of metallurgical coal across four stages as defined in the conditions of approval.

2.2 Activities Undertaken During the Reporting Period

The following key activities were undertaken during the reporting period (20 April 2025 – 19 April 2026):

- Ongoing open-cut coal mining operations within the Stage 1 project area throughout the reporting period.
- Commencement of Stage 2 operations following approval of the Stage 2 variation on 1 August 2025:
 - Stage 2 variation, Stage 2 Offset Area Management Plan (OAMP) and Koala & Greater Glider Conservation Program approval made on 1 August 2025
 - Stage 2 area activities (exploration related) commenced on 23 October 2025; and
 - Notification of Stage 2 commencement to DCCEEW on 27 October 2025 (Attachment E).
- Management of stage 1 and 2 areas occurred in keeping with the Matters of National Environmental Significance (MNES MP) Management Plan including but not limited to:
 - Establishment of koala fencing and planning for future works
 - Sequential clearing and active monitoring and management of threatened species; and
 - Monitoring and management of retained MNES habitats as required.
- Current Groundwater Dependent Ecosystem and Wetland Management Plan (GDEWMP) activities continued throughout the period, including annual independent specialist review and reporting completed 30 January 2026.
- Finalisation of stage 1 offset area legally binding mechanism and preparation of subsequent application package for stage 2 approved offset areas.

3. Compliance Report Requirements

3.1 Conditions of Approval

Condition 72 of EPBC Approval 2017/7867 requires Pembroke to prepare and publish an ACR. The report must be published on Pembroke's website within 60 business days following the relevant 12-month period, with notification to the Department within 5 business days of publication.

3.2 Alignment with DCCEE Annual Compliance Report Guidelines (2023)

This Report has been prepared in accordance with the DCCEE Annual Compliance Report Guidelines (2023). Table 2 cross-references each Guideline requirement to the relevant section of this Report.

Table 2. Alignment with DCCEE Annual Compliance Report Guidelines (2023)

Guideline Requirement	Reference in this Report
EPBC number	EPBC 2017/7867 — Cover page, Section 1.3
Project name	Olive Downs Coal Mine — Cover page, Section 1.1
Approval holder and ACN/ABN	Pembroke Olive Downs Pty Ltd — Section 1.4
Description of the approved action	Section 2
Location of the project	Section 2
Person accepting responsibility — declaration	Section 1.5
Dates for the reporting period	Section 1.3
Date of preparation	Cover page
All conditions listed with compliance designation	Appendix A — Table 1
Management plan specifics and evidence	Appendix A — Table 1
Corrective actions and new environmental risks	Section 5
Sensitive ecological data excluded	Public version — excluded per Condition 72(d)

4. Project Compliance

The compliance of the Project with all 80 conditions of EPBC Approval 2017/7867 during the reporting period is presented in Appendix A (Table 1). A summary of outcomes is provided below.

Table 3. Summary of Compliance Outcomes

Compliance Designation	Conditions
Compliant	40
Non-Compliant	0
Not Applicable	40
Total Conditions	80

During the reporting period 40 conditions were assessed as Compliant, 40 as Not Applicable. There were no reportable non-compliances during the period.

5. Corrective Actions and New Environmental Risks

5.1 Non-Compliance: Condition 10 — Stage 1 Offset Legal Securing Notification

There were no reportable non-compliances or associated environmental investigations during the reporting period.

Managing, monitoring and record keeping improvement opportunities across the project's environmental systems were sought to ensure continuous improvement and ongoing compliance with record keeping practices.

5.2 New Environmental Risks

No new environmental risks beyond those identified in the approved management plans were identified during the reporting period. All environmental monitoring activities were conducted in accordance with the approved MNES MP and GDEWMP, with no trigger value or limit exceedances recorded.

6. References

- EPBC Act Approval 2017/7867 — Variation to Conditions, dated 8 August 2025.
- Stage 1 OAMP approved 23 December 2020, and Year 4 Annual Report (Attachment C).
- Stage 2 OAMP (including Indirect Offsets Plan for Ornamental Snake), approved 1 August 2025 (Attachment A).
- MNES MP, approved 29 March 2022, and Annual Monitoring Report for the reporting period (Attachment B).
- GDEWMP approved 26 September 2023, and Annual Review completed January 2026.
- Pembroke Koala and Greater Glider Conservation Program, approved by DCCEEW (Attachment D).
- DCCEEW Annual Compliance Report Guidelines (2023).

Appendix A — Compliance Table

Table 1 presents the compliance assessment for all conditions of EPBC Approval 2017/7867 for the reporting period 20 April 2025 to 19 April 2026, consistent with the DCCEEW Annual Compliance Report Guidelines (2023).

Compliant	All requirements of a condition have been met, including implementation of management plans or other measures required by those conditions.
Non-Compliant	The requirements of a condition or elements of a condition, including management plans and other measures, have not been met.
Not Applicable	The requirements of a condition or elements of a condition fall outside the scope of the current reporting period.

Table 1. EPBC 2017/7867 — Conditions of Approval, Compliance Status (20 April 2025 – 19 April 2026)

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
Maximum Clearance Limits				
1	Maximum Clearance Limits	The approval holder must not clear outside of the project area.	Compliant	The project is currently operating within the approved stage 1 and 2 project areas. Stage 1 areas were active for the entire reporting period and the stage 2 variation was approved on 1 August 2025 (refer Attachment A). No clearing activities occurred outside of the project areas.
2	Maximum Clearance Limits	During each stage of the action, the approval holder must not clear more than the areas (in hectares) of habitat for each listed threatened species and community as specified in the following table.... Refer permit (dated 08 August 2025) for details	Compliant	MNES clearance limits remained within the allocated disturbances for stage 1 and 2 throughout the reporting period. Refer Attachment B - MNES MP Annual Reporting. Disturbances are managed via Planning processes which incorporate spatial tracking, management and reporting against MNES MP objectives and operational management via Permits to Disturb.
Stage 1 Environmental Offset				
3	Stage 1 Environmental Offset	To compensate for the clearance of habitat for listed threatened species and community for Stage 1 up to the limits as specified in condition 2, the approval holder must provide an environmental offset consistent with the Environmental Offsets Policy.	Compliant	Stage 1 OAMP was approved on 23 December 2020. The management of these areas remains ongoing in keeping with the approved plan.
4	Stage 1 Environmental Offset	The environmental offset to compensate for the clearance of 978.5 ha of Greater Glider (Petauroides volans) habitat for Stage 1 must result in a measured increase in Greater Glider (Petauroides volans) habitat connectivity in the riparian zones within the Stage 1 environmental offset.	Compliant	Stage 1 OAMP Table 2.1 sets out that all offsets have been provided in keeping with this EPBC Permit. Stage 1 offsets are 100% land based and incorporate adequate offset areas for POD's infrastructure EPBC Permits (EPBC Ref 2017/7868, EPBC Ref 2017/7869, EPBC Ref 2017/7870).
5	Stage 1 Environmental Offset	The approval holder must submit a Stage 1 Offset Area Management Plan (OAMP) prepared by a suitably qualified ecologist for the written approval of the Minister. The approval holder must not commence the action until the Stage 1 OAMP has been approved in writing by the	Compliant	No change to prior year's reporting. Stage 1 OAMP was approved in writing by the Minister on 23 December 2020.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		Minister. The approved Stage 1 OAMP must be implemented.		
6	Stage 1 Environmental Offset	The Stage 1 OAMP must include the offset information to compensate for the clearance of listed threatened species and community habitat as provided for in condition 2 in accordance with the principles of the Environmental Offsets Policy.	Compliant	No change to prior year's reporting. Section 6 of Stage 1 OAMP addresses this condition.
7	Stage 1 Environmental Offset	To assess the effectiveness of the management actions in the Stage 1 OAMP to increase Greater Glider (<i>Petauroides volans</i>) habitat connectivity in the riparian zones within the Stage 1 environmental offset, the approval holder must engage an independent suitably qualified expert to undertake an assessment every 5 years from the implementation date of the approved Stage 1 OAMP until the approved Stage 1 OAMP offset completion criteria are achieved.	Compliant	Greater glider habitat connectivity within riparian zones is addressed with Section 6 of Stage 1 OAMP. Annual Stage 1 OAMP - Year 4 report provides further update on progress (refer Attachment C)
8	Stage 1 Environmental Offset	The approval holder must ensure each assessment of the effectiveness of the management actions in the Stage 1 OAMP is: a) subject to a peer-review completed within 6 months of the completion of each such assessment; and b) published on its website with the findings of the peer-review within 6 months of the completion of the peer-review and for the duration of this approval.	Not applicable	In keeping with the Stage 1 OAMP (Year 4), no peer review was applicable during the reporting period. Stage 1 OAMP Table c.1 outlines that peer review is to occur as part of 5-year interim review of the plan.
9	Stage 1 Environmental Offset	The approval holder must legally secure the Stage 1 environmental offset within 2 years from the date that the Stage 1 OAMP is approved by the Minister in writing. The approved Stage 1 OAMP must be attached to the legal mechanism used to legally secure the Stage 1 environmental offset.	Compliant	On 25 June 2025, the Department of Natural Resources and Mines, Manufacturing, and Regional and Rural Development approved the prior submitted Voluntary Declaration on part of lots 5 SP113322 and 11 KL135 as areas of high nature conservation value. As per prior ACR reports the application was historically submitted in 2022 and subsequently revised and approved.
10	Stage 1 Environmental Offset	The approval holder must notify the Department within 5 business days of the mechanism to legally secure the Stage 1 environmental offset being executed.	Compliant	DCCEEW was notified, with detailed supporting information of the confirmed legally binding mechanism, being the Voluntary Declaration, within 5 business days of Pembroke confirming overall consistency with the Stage 1 OAMP requirements for covenants.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
				The Stage 1 OAMP sets out that a Voluntary Declaration would be made and in the longer term a suitable mechanism would be sought, once all collective offsets in advance for the project have been drawn upon, to fulfil requirements that extend past the 20-year active offset management period.
Stage 2 Environmental Offset				
11	Stage 2 Environmental Offset	To compensate for the clearance of habitat for listed threatened species and community for Stage 2 up to the limits as specified in condition 2, the approval holder must provide an environmental offset consistent with the Environmental Offsets Policy.	Compliant	Stage 2 OAMP which included an Indirect Offsets Plan for Ornamental Snake was approved by DCCEEW on 1 August 2025 (Refer Attachment A).
12	Stage 2 Environmental Offset	The environmental offset to compensate for the clearance of 741.43 ha of Greater Glider (<i>Petauroides volans</i>) habitat for Stage 2 must result in a measured increase in Greater Glider (<i>Petauroides volans</i>) habitat connectivity in the riparian zones within the Stage 2 environmental offset.	Compliant	The approved Stage 2 OAMP compensates for 741.43 ha of Greater Glider habitat within the allocated Stage 2 offset areas.
13	Stage 2 Environmental Offset	At least 6 months prior to the commencement of Stage 2, the approval holder must submit a Stage 2 OAMP prepared by a suitably qualified ecologist for the written approval of the Minister. The approval holder must not commence Stage 2 until the Stage 2 OAMP has been approved in writing by the Minister. The approved Stage 2 OAMP must be implemented.	Compliant	Stage 2 OAMP was submitted to DCCEEW for assessment on 20 May 2024 which resulted in the approved Stage 2 EPBC variation on 1 August 2025 (refer Attachment A).
14	Stage 2 Environmental Offset	The Stage 2 OAMP must include the offset information to compensate for the clearance of habitat for each listed threatened species and community as provided for in condition 2 in accordance with the principles of the Environmental Offsets Policy.	Compliant	The approved Stage 2 OAMP and associated Indirect Offsets Plan, in conjunction with the Koala and Greater Glider Conservation Program provides for necessary offsets as per condition 2.
15	Stage 2 Environmental Offset	To assess the effectiveness of the management actions in the Stage 2 OAMP to increase Greater Glider (<i>Petauroides volans</i>) habitat connectivity in the riparian zones within	Not applicable	The Stage 2 OAMP entered year 1 during the reporting period.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		the Stage 2 environmental offset, the approval holder must engage an independent suitably qualified expert to undertake an assessment every 5 years from the implementation date of the approved Stage 2 OAMP until the approved Stage 2 OAMP offset completion criteria are achieved.		
16	Stage 2 Environmental Offset	The approval holder must ensure each assessment of the effectiveness of the management actions in the Stage 2 OAMP is: a) subject to a peer-review completed within 6 months of the completion each such assessment; and b) published on its website with the findings of the peer-review within 6 months of the completion of the peer-review and for the duration of this approval.	Not applicable	Peer review is required as per the Stage 2 OAMP and was not applicable during the reporting period.
17	Stage 2 Environmental Offset	The approval holder must legally secure the Stage 2 environmental offset within 2 years from the date that the Stage 2 OAMP is approved by the Minister in writing. The approved Stage 2 OAMP must be attached to the legal mechanism used to legally secure the Stage 2 environmental offset.	Compliant	During the period the Voluntary Declaration, being the Queensland applicable legally binding mechanism, preparations commenced for the stage 2 offset areas.
18	Stage 2 Environmental Offset	The approval holder must notify the Department within 5 business days of the mechanism to legally secure the Stage 2 environmental offset being executed.	Not applicable	The legally binding mechanism was not executed during the reporting period.
Stage 3 Environmental Offset				
19	Stage 3 Environmental Offset	To compensate for the clearance of habitat for listed threatened species and community for Stage 3 up to the limits as specified in condition 2, the approval holder must provide an environmental offset consistent with the Environmental Offsets Policy.	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.
20	Stage 3 Environmental Offset	The environmental offset to compensate for the clearance of 3532.33 ha of Greater Glider (<i>Petauroides volans</i>) habitat for Stage 3 must, at a minimum, result in a measured increase in Greater Glider (<i>Petauroides volans</i>)	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		habitat connectivity in the riparian zones within the Stage 3 environmental offset.		
21	Stage 3 Environmental Offset	At least 12 months prior to the commencement of Stage 3, the approval holder must submit a Stage 3 OAMP prepared by a suitably qualified ecologist for the written approval of the Minister. The approval holder must not commence Stage 3 until the Stage 3 OAMP has been approved in writing by the Minister. The approved Stage 3 OAMP must be implemented.	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.
22	Stage 3 Environmental Offset	The Stage 3 OAMP must include the offset information to compensate for the clearance of habitat for each listed threatened species and community as provided for in condition 2 in accordance with the principles of the Environmental Offsets Policy.	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.
23	Stage 3 Environmental Offset	To assess the effectiveness of the management actions in the Stage 3 OAMP to increase Greater Glider (<i>Petauroides volans</i>) habitat connectivity in the riparian zones within the Stage 3 environmental offset, the approval holder must engage an independent suitably qualified expert to undertake an assessment every 5 years from the implementation date of the approved Stage 3 OAMP until the approved Stage 3 OAMP offset completion criteria are achieved.	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.
24	Stage 3 Environmental Offset	The approval holder must ensure each assessment of the effectiveness of the management actions in the Stage 3 OAMP is: a) subject to a peer-review completed within 6 months of the completion each such assessment; and b) published on its website with the findings of the peer-review within 6 months of the completion of the peer-review and for the duration of this approval.	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.
25	Stage 3 Environmental Offset	The approval holder must legally secure the Stage 3 environmental offset within 2 years from the date that the Stage 3 OAMP is approved by the Minister in writing. The	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		approved Stage 3 OAMP must be attached to the legal mechanism used to legally secure the Stage 3 environmental offset.		
26	Stage 3 Environmental Offset	The approval holder must notify the Department within 5 business days of the mechanism to legally secure the Stage 3 environmental offset being executed.	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.
Stage 4 Environmental Offset				
27	Stage 4 Environmental Offset	To compensate for the clearance of habitat for listed threatened species and community for Stage 4 up to the limits as specified in condition 2, the approval holder must provide an environmental offset consistent with the Environmental Offsets Policy.	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.
28	Stage 4 Environmental Offset	At least 12 months prior to the commencement of Stage 4, the approval holder must submit a Stage 4 OAMP prepared by a suitably qualified ecologist for the written approval of the Minister. The approval holder must not commence Stage 4 until the Stage 4 OAMP has been approved in writing by the Minister. The approved Stage 4 OAMP must be implemented.	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.
29	Stage 4 Environmental Offset	The Stage 4 OAMP must include the offset information to compensate for the clearance of habitat for each listed threatened species and community as provided for in condition 2 in accordance with the principles of the Environmental Offsets Policy.	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.
30	Stage 4 Environmental Offset	The approval holder must legally secure the Stage 4 environmental offset within 2 years from the date that the Stage 4 OAMP is approved by the Minister in writing. The approved Stage 4 OAMP must be attached to the legal mechanism used to legally secure the Stage 4 environmental offset.	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
31	Stage 4 Environmental Offset	The approval holder must notify the Department within 5 business days of the mechanism to legally secure the Stage 4 environmental offset being executed.	Not applicable	Not applicable during the reporting period. The project remains within the approved stage 1 and 2 project areas.
Koala / Greater Glider Program				
32	Koala / Greater Glider Program	In addition to its obligations under the Environmental Offsets Policy, the approval holder must contribute \$100,000 (GST exclusive and indexed in line with CPI for each year to be equal to the value of \$100,000 on the date of commencement of Stage 2) each year for 10 years to a program where the total contribution will be used for the better protection and long-term conservation of the Koala and Greater Glider in the Bowen Basin.	Compliant	The Koala and Greater Glider Conservation Program is delivered in conjunction with an independent third party via a financial contribution framework which guides the commercial agreements established between the parties. In keeping with the commercial terms, a payment via invoice was made to this external party on 11 August 2025. This has been adopted as the commencement of stage 2 for the purposes of reporting.
33	Koala / Greater Glider Program	The approval holder must submit a framework to make financial contributions to the program for the written approval of the Minister at least 3 months prior to the commencement of Stage 2. The approved framework must be implemented.	Compliant	The Framework was submitted to DCCEEW as part of the Stage 2 OAMP and associated variation package in May 2024.
34	Koala / Greater Glider Program	The approval holder must not commence Stage 2 until it has provided notice, with documentary evidence, to the Department that the: a) framework required under condition 33 has been approved by the Minister in writing; and b) the first financial contribution has been made.	Compliant	As per condition 32 summary, payment was made and notified accordingly to DCCEEW via EPBC Monitoring.
34	Koala / Greater Glider Program	For each subsequent annual financial contribution, the approval holder must provide notice, with documentary evidence, to the Department within 20 business days after each such financial contribution has been made.	Not applicable	No further payments were required during the reporting period.
35	Koala / Greater Glider Program	For each subsequent annual financial contribution, the approval holder must provide notice, with documentary evidence, to the Department within 20 business days after each such financial contribution has been made.	Not applicable	No further payments were required during the reporting period.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
36	Koala / Greater Glider Program	The activities funded by the program must target in the Bowen Basin, at a minimum: a) translocation programs to translocate Koala and Greater Glider individuals from the project area during pre-clearance surveys and clearing to determine its success in reducing individual mortality and its effects on the population size of the Koala and Greater Glider; b) revegetate, rehabilitate and restore habitat in the riparian zones associated with watercourses to create and maintain Koala and Greater Glider habitat connectivity; c) surveys to determine Koala and Greater Glider population density and carrying capacity across the Bowen Basin; and d) implement priorities identified in relevant recovery plans, threat abatement plans and/or approved conservation advices, and evaluate their success and cost effectiveness.	Compliant	The DCCEEW approved Pembroke Koala and Greater Glider Conservation Program outlines the various activities that may be funded by the program (refer Attachment D).
37	Koala / Greater Glider Program	At a minimum, the following information, prepared by an independent suitably qualified expert, must be provided to the Department prior to commissioning each activity: a) commitments, including financial commitments and proposed timeframe, that will be implemented to support the undertaking of the activity; b) the proposed timeframe for undertaking the activity; c) the independent suitability qualified expert/s who has design and will implement the activity; d) timing of a peer-review of the outcomes of the activity; e) the proposed peer-reviewed scientific journal and/or other method/s to ensure the outcomes of the activity is made publicly available; and f) details, with supporting evidence, of the consultation undertaken (including with the Queensland Government and relevant Recovery Teams) on how the activity can complement and/or align with other studies for the Koala and Greater Glider in the Bowen Basin.	Compliant	The DCCEEW approved Pembroke Koala and Greater Glider Conservation Program was developed by independent suitably qualified experts and considers the requirements of condition 37.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
38	Koala / Greater Glider Program	The outcomes of each activity must be subject to a peer-review and must, at a minimum, be published on the approval holder's website for the remaining period of effect of this approval.	Not applicable	The DCCEEW approved Pembroke Koala and Greater Glider Conservation Program sets out the peer review requirements. None were applicable during the reporting period.
39	Koala / Greater Glider Program	A review of outcomes from the financial contributions must commence 5 years after the date of the first financial contribution or as otherwise agreed by the Minister in writing. This review must take into account progress of each activity and any subsequent on-ground actions, as well as the involvement of other holders of approvals under the EPBC Act making financial contributions.	Not applicable	A review was not applicable during the reporting period.
40	Koala / Greater Glider Program	A detailed report of the outcomes of the review must be provided to the Department within 6 months of the date of commencement of the review.	Not applicable	A review was not applicable during the reporting period.
Ripstone Creek Diversion				
41	Ripstone Creek Diversion	At least 15 years prior to the commencement of the Ripstone Creek Diversion, the approval holder must submit a Ripstone Creek Diversion Program (RCDP) for the written approval of the Minister to ensure Greater Glider (<i>Petauroides volans</i>) habitat connectivity is maintained along Ripstone Creek for the duration of this approval.	Not applicable	No activities or planning associated with Ripstone Creek Diversion requirements occurred during the reporting period.
42	Ripstone Creek Diversion	The RCDP must be prepared by a suitably qualified ecologist and include details, with detailed justification, of: a) the activities, and associated timing, for the Ripstone Creek Diversion; b) the description, ecological values and location (maps and shapefiles) of the existing Ripstone Creek channel to be impacted by the Ripstone Creek Diversion; c) the extent (in hectares) and quality of Greater Glider (<i>Petauroides volans</i>) habitat in the existing Ripstone	Not applicable	No activities or planning associated with Ripstone Creek Diversion requirements occurred during the reporting period.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		Creek channel to be impacted by the Ripstone Creek Diversion; d) baseline data, including results from field validation surveys, and quantifiable ecological data on the quality of Greater Glider (<i>Petauroides volans</i>) habitat in the existing Ripstone Creek channel to be impacted by the Ripstone Creek Diversion; e) the outcome to ensure Greater Glider (<i>Petauroides volans</i>) habitat connectivity is maintained along Ripstone Creek for the duration of this approval; f) Ripstone Creek completion criteria to demonstrate that Greater Glider (<i>Petauroides volans</i>) habitat connectivity is maintained along Ripstone Creek; g) Ripstone Creek interim milestones to track progress against ensuring the Ripstone Creek completion criteria are achieved; h) proposed timing of Ripstone Creek interim milestones to track progress against achieving the Ripstone Creek completion criteria; i) details of the actions, and timeframes for implementation, to be carried out to achieve the Ripstone Creek completion criteria; j) details of the nature, timing and frequency of monitoring to inform progress against achieving the Ripstone Creek interim milestones (the frequency of monitoring must be sufficient to track progress towards each set of milestones, and sufficient to determine whether the area of the Ripstone Creek Diversion is likely to achieve those milestones in adequate time to implement all necessary corrective actions); k) proposed timing for the submission of internal monitoring reports which provide evidence demonstrating whether the Ripstone Creek interim milestones have been achieved; l) proposed mitigation strategy, including corrective action/s and their timing, if monitoring activities indicate		

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		the Ripstone Creek interim milestones will not or have not been achieved; and m) a risk analysis and a risk management and mitigation strategy for all risks to the timely achievement of the Ripstone Creek completion criteria, including a rating of all initial and post-mitigation residual risks in accordance with the risk assessment matrix. <i>Note: The Minister may, throughout the RCDP approval process, seek advice from experts on the draft and/or revised RCDP proposed by the approval holder. As a consequence, specific matters identified through such advice may need to be addressed in a revised RCDP. Where such advice is sought, the approval holder will be provided with the opportunity to submit information and respond to the specific matters identified, in order to ensure the approved RCDP is based on the best available information.</i>		
43	Ripstone Creek Diversion	The approval holder must not commence mining activities in the Ripstone Creek Pit (ODS9) until the RCDP has been approved by the Minister in writing. The approved RCDP must be implemented.	Not applicable	No activities or planning associated with Ripstone Creek Diversion requirements occurred during the reporting period.
44	Ripstone Creek Diversion	The approval holder must not commence the Ripstone Creek Diversion until it demonstrates, to the Minister's written satisfaction, that the Ripstone Creek completion criteria have been achieved.	Not applicable	No activities or planning associated with Ripstone Creek Diversion requirements occurred during the reporting period.
Matters of National Environmental Significance Management Plan				
45	MNES Management Plan	To avoid, mitigate and manage impacts of the action on the listed threatened species and community and their habitat, the approval holder must submit a MNES Management Plan for the written approval of the Minister. The MNES Management Plan must be prepared by a suitably qualified ecologist and in accordance with the	Compliant	The MNES MP received written approval from the Minister on 29 March 2022.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		Department's Environmental Management Plan Guidelines.		
46	MNES Management Plan	The MNES Management Plan must include: a. details of specific environmental outcomes to be achieved for the listed threatened species and community and their habitat; b. interim milestones that set targets at 5-yearly intervals to track progress against achieving the environmental outcomes; c. details of the measures, and timeframes for implementation, that will be taken in the project area to avoid, mitigate and manage impacts on the listed threatened species and community and their habitat during clearance, construction, operation and decommissioning of the action, including but not limited to: i. clearance of one corridor, of a maximum 45 metres in width, in the riparian zone of the Isaac River; ii. clearance of two corridors, of a maximum 60 metres in width, in the riparian zone of the Isaac River; iii. clearance of two corridors, of a maximum 30 metres in width, in the riparian zone of Ripstone Creek; iv. no clearance in the riparian zones of the Isaac River and Ripstone Creek other than that specified in this approval; v. removal and exclusion of grazing from all riparian zones in the project area; vi. installation of rope ladder crossings of the cleared corridors in the riparian zones of the Isaac River and Ripstone Creek to maintain Greater Glider (<i>Petauroides volans</i>) habitat connectivity; vii. enforced vehicle speed limits of 60 kilometres/hour or less; viii. installation of Koala-	Compliant	The approved MNES MP addresses the requirements of Condition 46 (refer Attachment B).

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
	Condition 46 continued	proof fences, without barb-wire, in Koala (<i>Phascolarctos cinereus</i>) (combined populations of Qld, NSW and the ACT) habitat and Greater Glider (<i>Petauroides volans</i>) habitat; ix. installation of Koala poles at Koala-proof fences, with proposed spacing, in Koala (<i>Phascolarctos cinereus</i>) (combined populations of Qld, NSW and the ACT) habitat; d. details on the specific timing, frequency and duration of the measures to be implemented; e. evidence of how the measures are based on best available practices, appropriate standards, and supported by scientific evidence; f. details on how the measures have been developed with consideration of the S.M.A.R.T principle; g. details of the nature, timing and frequency of monitoring to inform progress against achieving the 5-yearly interim milestones (the frequency of monitoring must be sufficient to track progress towards each set of milestones, and sufficient to determine whether the milestones are likely to be achieved in adequate time to implement all necessary corrective actions); h. timing for the submission of internal monitoring reports which provide evidence demonstrating whether the interim milestones have been achieved; i. timing for the implementation of corrective actions if monitoring indicates the interim milestones will not or have not been achieved; j. a risk analysis and a risk management and mitigation strategy for all risks to the successful implementation of the MNES Management Plan and timely achievement of the environmental outcomes, including a rating of all initial and post-mitigation residual risks in accordance with the risk assessment matrix; and k. evidence of how the measures and corrective actions take into account relevant approved conservation advices		

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		and are consistent with relevant recovery plans and threat abatement plans.		
47	MNES Management Plan	The approval holder must not commence the action until the MNES Management Plan has been approved by the Minister. The approved MNES Management Plan must be implemented.	Compliant	As per previous reporting, activities within the Project Area commenced after the approval of the MNES MP and the MNES MP was implemented accordingly (refer Attachment B).
Groundwater Dependent Ecosystem Management Plan				
48	GDEMP Core Requirements	The approval holder must ensure there is no adverse effect on the ecological values of GDEs in, or within 2 kilometres of, the project area from water- related impacts as a result of mining activities of the action.	Compliant	A GDEWMP was developed and approved on 26 September 2023 prior to mining activities occurring.
49	GDEMP Core Requirements	The approval holder must submit a GDEMP for the written approval of the Minister. The GDEMP must be prepared by a suitably qualified water resources expert and in accordance with the Department's Environmental Management Plan Guidelines. The GDEMP must include the following details, with detailed justification, of: a. the location (including maps and shapefiles), extent (in hectares) and description of the ecological values of all GDEs derived from both desktop and site-specific field information; b. a risk-based assessment approach method to determine all low risk GDEs, moderate risk GDEs, high risk GDEs and very high risk GDEs; c. hydrogeological conceptual modelling and surface water modelling, including an ecohydrological model incorporating the stressor-response relationships for all GDEs, local-scale numerical modelling and consideration of cumulative impacts; d. how the modelling is fit-for-purpose to inform the site-specific assessment and the risk-based assessment approach;	Compliant	The project conducts monitoring and management based upon the approved GDEWMP. The works and associated MP are reviewed annually and reported upon by Independent Specialists. The last review was completed on 30 January 2026.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
	Condition 49 Continued	e. a site-specific assessment to verify the results of modelling for predicted moderate risk GDEs, high risk GDEs and/or very high risk GDEs, including consideration of past monitoring data; f. performance criteria, trigger values and limits for moderate risk GDEs, high risk GDEs and/or very high risk GDEs to demonstrate there will be no adverse effect on the ecological values of GDEs from water-related impacts as a result of mining activities of the action; g. an ongoing monitoring program to ensure no adverse effect on the ecological values of GDEs is occurring, including a 12 monthly timeframe for updating all modelling; h. a mitigation strategy, including separate corrective actions, for where trigger values have been reached and/or exceeded for moderate risk GDEs, high risk GDEs and/or very high risk GDEs to ensure limits are not reached and/or exceeded, and consideration of cumulative impacts; i. timing for the submission of internal monitoring reports which provide evidence demonstrating performance against the trigger values and limits, including analysis of trends that indicate that reaching and/or exceeding a trigger value and/or limit is likely during or before the next reporting period; j. a 3-year timeframe for updating all risk ratings derived from the risk- based assessment approach and undertaking, with proposed implementation timeframes, any outstanding site-specific assessments for new predicted moderate risk GDEs, high risk GDEs and/or very high risk GDEs; k. timing for the regular review of the GDEMP to assess the effectiveness of measures and/or corrective actions in ensuring no adverse effect on the ecological values of GDEs is occurring, including details of the effectiveness of updated model predictions;		

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		l. a process for updating the GDEMP to take into account any changes to the existing regulatory arrangements in place to avoid adverse effect on the ecological values of GDEs, not limited to legislation, standards or codes of practice, governance arrangements and existing controls; and m. timing for notifying the Department of whether an environmental offset in accordance with the principles of the Environmental Offsets Policy may be required to be implemented by the approval holder.		
50	GDEMP Core Requirements	The approval holder must not commence mining activities of Stage 1 until the GDEMP has been approved by the Minister in writing. The approved GDEMP must be implemented.	Compliant	The GDEWMP was developed and approved in writing by the Minister on 26 September 2023 prior to the commencement of mining activities.
51	GDEMP Core Requirements	The approval holder must, during the implementation of the GDEMP or a revised GDEMP under condition 78, undertake one or more of the provisions of conditions 52 to 64 if the Minister determines and notifies the approval holder in writing that the action has, or is likely to, reach and/or exceed an approved trigger value.	Compliant	There were no matters or actions associated with trigger value exceedances during the period.
GDEMP Implementation & Offsets (Stages 1-3)				
52	GDEMP Implementation & Offsets (Stages 1-3)	If the approval holder detects that a trigger value for moderate risk GDEs, high risk GDEs and/or very high risk GDEs has been reached and/or exceeded for Stage 1, Stage 2 or Stage 3, the approval holder must report this to the Minister within 5 business days of the detection.	Compliant	There were no matters or actions associated with trigger value exceedances during the period.
53	GDEMP Implementation & Offsets (Stages 1-3)	For high risk GDEs and/or very high risk GDEs, and where a limit is predicted to be reached and/or exceeded after the next 12 months, the approval holder must submit a GDE Offset Strategy prepared by a suitably qualified water resources expert and suitably qualified person and in accordance with the principles of the Environmental Offsets Policy, for the written approval of the Minister. The GDE Offset Strategy must be submitted to the	Not applicable	There were no matters or actions associated with trigger value exceedances during the period.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		Department within 3 months of the detection as specified in condition 52.		
54	GDEMP Implementation & Offsets (Stages 1-3)	For high risk GDEs and/or very high risk GDEs, and where a limit is predicted to be reached and/or exceeded within 12 months, the approval holder must submit a GDE Offset Management Plan, prepared by a suitably qualified water resources expert and suitably qualified person in accordance with the principles of the Environmental Offsets Policy, for the written approval of the Minister. The GDE Offset Management Plan must specify a timeframe for implementation and be submitted to the Department within 3 months of the detection as specified in condition 52.	Not applicable	There were no matters or actions associated with trigger value exceedances during the period.
55	GDEMP Implementation & Offsets (Stages 1-3)	The approval holder must not commence the next stage of the action until the GDE Offset Strategy and/or GDE Offset Management Plan has been approved by the Minister in writing. The GDE Offset Strategy must be implemented.	Compliant	There were no GDE Offset Strategy or Offset Management Plans applicable during the period.
56	GDEMP Implementation & Offsets (Stages 1-3)	If the approval holder detects that a limit has been reached and/or exceeded for Stage 1, Stage 2 and/or Stage 3, the approval holder must report the detection to the Minister within 1 business day of the detection.	Compliant	There were no reportable exceedances during the period.
57	GDEMP Implementation & Offsets (Stages 1-3)	The approval holder must: a. within 5 business days of notifying the Minister of the detection as specified in condition 56, implement a GDE Offset Management Plan that has been approved by the Minister as required condition 55; and/or b. within 3 months of notifying the Minister of the detection as specified in condition 56, submit a GDE Offset Management Plan for the written approval of the Minister. The GDE Offset Management Plan must be prepared by suitably qualified water resources expert and suitably qualified person, and in accordance with the principles of the Environmental Offsets Policy.	Not applicable	No notification events occurred during the period.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
58	GDEMP Implementation & Offsets (Stages 1-3)	The approved GDE Offset Management Plan/s required at condition 57 must be implemented for the remaining duration of this approval or a timeframe otherwise agreed to in writing by the Minister.	Not applicable	No notification events occurred during the period.
59	GDEMP Implementation & Offsets (Stages 1-3)	The approval holder must not commence the next stage of the action until the approved GDE Offset Management Plan is demonstrated, to the Minister's written satisfaction, to be achieving the approved offset completion criteria, or a timeframe otherwise agreed to in writing by the Minister.	Compliant	There were no GDE Offset Strategy or Offset Management Plans applicable during the period.
GDEMP Implementation & Offsets (Stage 4)				
60	GDEMP Implementation & Offsets (Stage 4)	At least 3 years prior to the commencement of Stage 4, the approval holder must submit a Stage 4 GDE Offset Management Plan in the event that there is an adverse effect on the ecological values of GDEs as a result of Stage 4 for the written approval of the Minister. The Stage 4 GDE Offset Management Plan must be prepared by suitably qualified water resources expert and suitably qualified person in accordance with the principles of the Environmental Offsets Policy.	Not applicable	The project is currently operating within the approved stage 1 and 2 project areas.
61	GDEMP Implementation & Offsets (Stage 4)	The approval holder must not commence Stage 4 until the Stage 4 GDE Offset Management Plan is approved by the Minister in writing.	Not applicable	The project is currently operating within the approved stage 1 and 2 project areas.
62	GDEMP Implementation & Offsets (Stage 4)	If the approval holder detects that a trigger value has been reached and/or exceeded for Stage 4, the approval holder must, within 5 business days of the detection: a) report this to the Minister; and b) notify the Minister that the approved Stage 4 GDE Offset Management Plan may be implemented, with timing for implementation, where an adverse effect on the ecological values of GDEs is predicted or known to occur in less than 12 months.	Not applicable	The project is currently operating within the approved stage 1 and 2 project areas.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
63	GDEMP Implementation & Offsets (Stage 4)	If the approval holder detects that a limit has been reached and/or exceeded for Stage 4, the approval holder must: a) report this to the Minister within 1 business day of the detection; and b) implement the approved Stage 4 GDE Offset Management Plan required at condition 61 within 5 business days of the detection.	Not applicable	The project is currently operating within the approved stage 1 and 2 project areas.
64	GDEMP Implementation & Offsets (Stage 4)	The approved GDE Stage 4 Offset Management Plan must be implemented for the remaining duration of this approval or a timeframe otherwise agreed to in writing by the Minister.	Not applicable	The project is currently operating within the approved stage 1 and 2 project areas.
Commencement Notifications				
65	Commencement Notifications	The approval holder must notify the Department in writing of the date of the commencement of the action within 5 business days after the date of the commencement of the action.	Compliant	Commencement of the action was notified within 5 business days as reported within the Year 1 ACR.
66	Commencement Notifications	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 written agreement of the Minister.	Compliant	Commencement of the action was notified within 5 business days as reported within the Year 1 ACR.
67	Commencement Notifications	The approval holder must notify the Department in writing of the date of the commencement of Stage 2, Stage 3 and Stage 4 respectively within 5 business days after the date of the commencement of Stage 2, Stage 3 and Stage 4 respectively.	Compliant	Notification of commencement of stage 2 was made on 27 October 2025 (refer Attachment E).
Compliance Records				
68	Compliance Records	The approval holder must maintain accurate and complete compliance records.	Compliant	Pembroke has an established Environmental Management System which enables accurate record keeping.
69	Compliance Records	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the	Compliant	Compliance records have been made available as per DCCEEW requests during the reporting period.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		timeframe specified in the request. Note: Compliance 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. Summaries of the result of an audit may be published on the Department's website or through the general media.		
Publication & Data Submission				
70	Publication & Data Submission	The approval holder must: a. submit plans electronically to the Department; b. unless otherwise agreed to in writing by the Minister, publish each plan on its website within 20 business days of the date of: i. this approval; or ii. the date a plan is submitted to the Department; or iii. the date a plan has been approved by the Minister in writing; c. exclude or redact sensitive ecological data from plans published on its website or provided to a member of the public; and d. keep plans published on its website for the duration of this approval.	Compliant	All current Management Plans have been published to Pembroke's website and remain accessible.
71	Publication & Data Submission	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under conditions 5, 13, 21, 28, 43, 47, 50, 55, 58 and 61 is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plans within 2 months of each survey event.	Compliant	Data is provided electronically as per the requirements of the various conditions and their associated management plans.
Annual Compliance Reporting				
72	Annual Compliance Reporting	The approval holder must prepare a compliance report for each 12 month period following the date of the commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must: a.	Compliant	This report fulfils the requirements of this condition.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		publish each compliance report on its website within 60 business days following the relevant 12 month period; b. notify the Department by email that a compliance report has been published on its website within 5 business days of the date of publication; c. keep all compliance reports publicly available on its website for the duration of this approval; d. exclude or redact sensitive ecological data from compliance reports published on its website; and e. 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.		
Incident / Non-compliance Reporting				
73	Incident / Non-compliance Reporting	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 but no later than 2 business days after becoming aware of the incident or non-compliance. The notification must specify: a. the condition which is or may be in breach; and b. a short description of the incident and/or non-compliance.	Compliant	No reportable incidents or non-compliances were identified during the period.
74	Incident / Non-compliance Reporting	The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in the plans as soon as practicable but no later than 10 business days after becoming aware of the incident or non-compliance, specifying: 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.	Compliant	No reportable incidents or non-compliances were identified during the period.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
Independent Audit				
75	Independent Audit	The approval holder must ensure that independent audits of compliance with the conditions of this approval are conducted when requested in writing by the Minister.	Not applicable	No requests for independent audits were made during the period.
76	Independent Audit	For each independent audit, the approval holder must: 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.	Not applicable	No requests for independent audits were made during the period.
77	Independent Audit	The approval holder must publish the audit report on its website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on its website for the duration of this approval.	Not applicable	No requests for independent audits were made during the period.
Revision of Approved Plans				
78	Revision of Approved Plans	The approval holder may, at any time, apply to the Minister for a variation to a management plan, program or strategy approved by the Minister under conditions 5, 13, 21, 28, 43, 50, 55, 58 and 61, 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 management plan, program or strategy then, from the date specified by the Minister, the approval holder must implement the revised management plan, program or strategy in place of the previously approved management plan.	Not applicable	No revised management plans, programs or strategies were approved during the period.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
Completion of Action				
79	Completion of Action	Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.	Not applicable	The action remains ongoing.

Attachment A

Stage 2 Variation Approval



Australian Government

Department of Climate Change, Energy,
the Environment and Water

EPBC 2017/7867

[REDACTED]
[REDACTED]
Pembroke Olive Downs Pty Ltd
[REDACTED]
[REDACTED]

Approval of condition variation and draft plans for Olive Downs Project Mine Site and Access Road, near Moranbah, Queensland

Dear [REDACTED]

Thank you for your correspondence to the department requesting the variation of conditions to facilitate Stage 2 of the approval attached to the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval 2017/7867 and for submitting the Stage 2 Offset Area Management Plan and the Koala and Greater glider financial framework as required by these same conditions of approval.

Officers of this department have reviewed the variation request. As delegate of the Minister for the Environment and Water, I have varied conditions 2, 12, 13, 20, 33 and attachments I, J and K as attached to EPBC Act approval 2017/7867 under section 143(1)(c) of the EPBC Act. The action must now be taken in accordance with the varied conditions specified in the variation notification, which has been attached for your information.

Officers of this department have advised me on the Stage 2 Offset Area Management Plan and the Koala and Greater Glider financial framework and the requirements of the relevant conditions for these two plans to be submitted prior to commencement of Stage 2 of the Action. On this basis, and as a delegate of the Minister for the Environment and Water, I have decided to approve the Stage 2 Offset Area Management Plan and the Koala and Greater Glider financial framework. These two plans must now be implemented.

As you are aware, the department has an active monitoring program which includes monitoring inspections, desktop document reviews and audits. Please ensure that you maintain accurate records of all activities associated with, or relevant to, the conditions of approval so that they can be made available to the department on request.

Should you require any further information please contact [REDACTED] or by email to [REDACTED]

Yours sincerely



[REDACTED]

Acting Branch Head

Environment Assessments (Vic, Tas) and Post Approvals Branch

1 August 2025

Attachment B

MNES Management Plan Annual Report



Attexó

Compliance Report Year 5

Matters of National Environmental Significance Management
Plan

Prepared for: Pembroke Olive Downs Pty Ltd

Date: 16/03/2026



Document information

Document	Compliance Report Year 5
Attexo ref	PEM-001
Date	16 March 2026
Prepared by	Dr Elliot Leach, Andrew Jensen
Reviewed by	Rosemary Shearman

Quality information

Rev	Date	Details	Authorisation Name/position	Signature
0	13-03-2026	Final for issue	Rosemary Shearman, Senior Environmental Consultant	

Prepared for:

Pembroke Olive Downs Pty Ltd

Prepared by:

Attexo Group Pty Ltd

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Attexo Group Pty Ltd 2026

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1. Introduction

1.1 Project background

Pembroke Olive Downs Pty Ltd (Pembroke) owns and operates the Olive Downs Coking Coal Project (the Project), a greenfield metallurgical coal mine within the Bowen Basin, located approximately 40 km south-east of Moranbah, Queensland (**Figure 1.1**). The Project was declared a 'controlled action' due to potential for the mine to have a significant impact on matters of national environmental significance (MNES) under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The Project has been approved under the EPBC Act and the Queensland Coordinator-General under the *State Development and Public Works Organisation Act 1971*. For the mine site and access road an approval under EPBC Act was granted on 14 May 2020 (EPBC 2017/7867).

An MNES Management Plan (MMP) for Stage 1 of the Project was prepared to address Conditions 2 and 45 to 47 of the EPBC Act approval, as well as guidance material provided by representatives of the then Department of Agriculture, Water and the Environment (now the Department of Climate Change, Energy, the Environment and Water (DCCEEW)).

The MMP was approved in December 2020. The current version of the MMP was approved by DCCEEW in March 2022 (EMM 2022). An amendment to the MMP will be sought with DCCEEW post the five-year interim review which is being conducted within this same review period.

The project is in Stage 1 and the Stage 2 variation was approved on 1 August 2025. Clearing activity in Stage 2 commenced in October 2026, with formal notification to DCCEEW¹ on 27 October 2025, as per condition 67 of EPBC Permit 2017/7867).

The Project area is shown on **Figure 1.1** and the retained MNES habitats within the Project area subject to ongoing monitoring is shown in **Figure 1.2**.

1.2 MNES Management Plan requirements

In accordance with EPBC Act approval (EPBC 2017/7867), the purpose of the MMP is to describe how impacts on the 'listed threatened species and community' and associated habitats will be avoided, mitigated, and managed.

The applicable 'listed threatened species and community' referenced in the approval are:

- ornamental snake (*Denisonia maculata*)
- squatter pigeon (southern) (*Geophaps scripta scripta*)
- greater glider (*Petauroides volans*)
- koala (*Phascolarctos cinereus*)
- Australian painted snipe (*Rostratula australis*)
- Brigalow (*Acacia harpophylla* dominant and co-dominant) threatened ecological community (Brigalow TEC).

The environmental outcomes to be achieved through implementation of the MMP include the following:

¹ DCCEEW notification made via epbcmonitoring@dcceew.gov.au



- Avoid and minimise injuries or mortality of MNES species during all Project phases, in particular the vegetation clearing phase.
- Disturbance does not occur to MNES habitats and Brigalow TEC outside of approved Project stages.
- MNES habitat areas outside of approved Project stages will be managed to maintain habitat quality and utilisation by MNES on land as part of Stage 1 owned by Pembroke.
- Connectivity is maintained for Greater Glider and Koala. Connectivity structures are installed in proximity to habitats including along riparian corridors of Isaac River. Connectivity structures to be installed include:
 - a. Greater Glider rope crossings;
 - b. Koala exclusion fencing in combination with Koala poles;
 - c. Bridge crossing of Isaac River facilitating Koala movement underneath the bridge including use of Koala furniture.

To achieve these outcomes, the MMP details avoidance, mitigation and management measures required for each Project phase (i.e. vegetation clearance, construction and operations and decommissioning). Performance criteria pertaining to each Project phase are presented in Tables 4.1 to 4.3 in the MMP (EMM 2022).

An additional component of the MMP is the requirement to conduct monitoring of MNES values, habitats and environmental factors such as erosion and dust generation. MNES monitoring activities are detailed in Section 6 of the MMP (EMM 2022).

Finally, there are MMP requirements for reporting and administrative compliance.

1.3 Purpose and structure of this report

In accordance with the Section 7.1 of the MMP (EMM 2022), an annual compliance report is to be prepared at the end of each calendar year to summarise all management, monitoring and corrective actions that have been completed in relation to the Project's impact site in that calendar year. The annual compliance report is to assess these actions against relevant performance criteria, and track progress towards five-yearly interim milestones.

As per the MMP (EMM 2022), the report summarises:

- all management actions that have been completed in that 12-month period;
- all monitoring that has been completed and monitoring results;
- assessment of monitoring results against performance criteria and five-year interim milestones to determine if they are being and or likely to be met; and
- identification of any issues that arose which required intervention or corrective actions to be implemented.

This is the second annual report prepared and covers all information relating to the Project area in Year 5 of operations (i.e. in the 2025 calendar year, with the MMP reporting period being 1 January to 31 December); the previous report covered Years 1-4 (EMM 2025a). Compliance with performance criteria specific to each MNES management measure or MNES monitoring component is assessed in the relevant section in accordance with the *DCCEEW Independent Audit and Audit Report Guidelines* (DCCEEW 2019), as follows:



- **Compliant:** Where there is sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the EPBC Act approval have been complied with during the timeframe.
- **Non-compliant:** Where there is sufficient verifiable evidence to demonstrate that the intent of one or more specific elements of the EPBC Act approval have not been complied with during the timeframe.
- **Not applicable:** EPBC Act approval requirement has an activation or timing trigger that has not been met therefore a determination of compliance could not be made.

Section 2 of the report discusses compliance with required MNES management measures and is divided into sections corresponding to the following Project phases relevant for the activities occurring during the reporting period, noting that no construction related activities occurred within the period (**Section 2.2**).

- **Section 2.1** – vegetation clearing phase
- **Section 2.33** – operation and decommissioning phases.

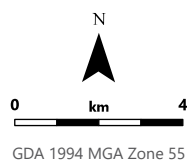
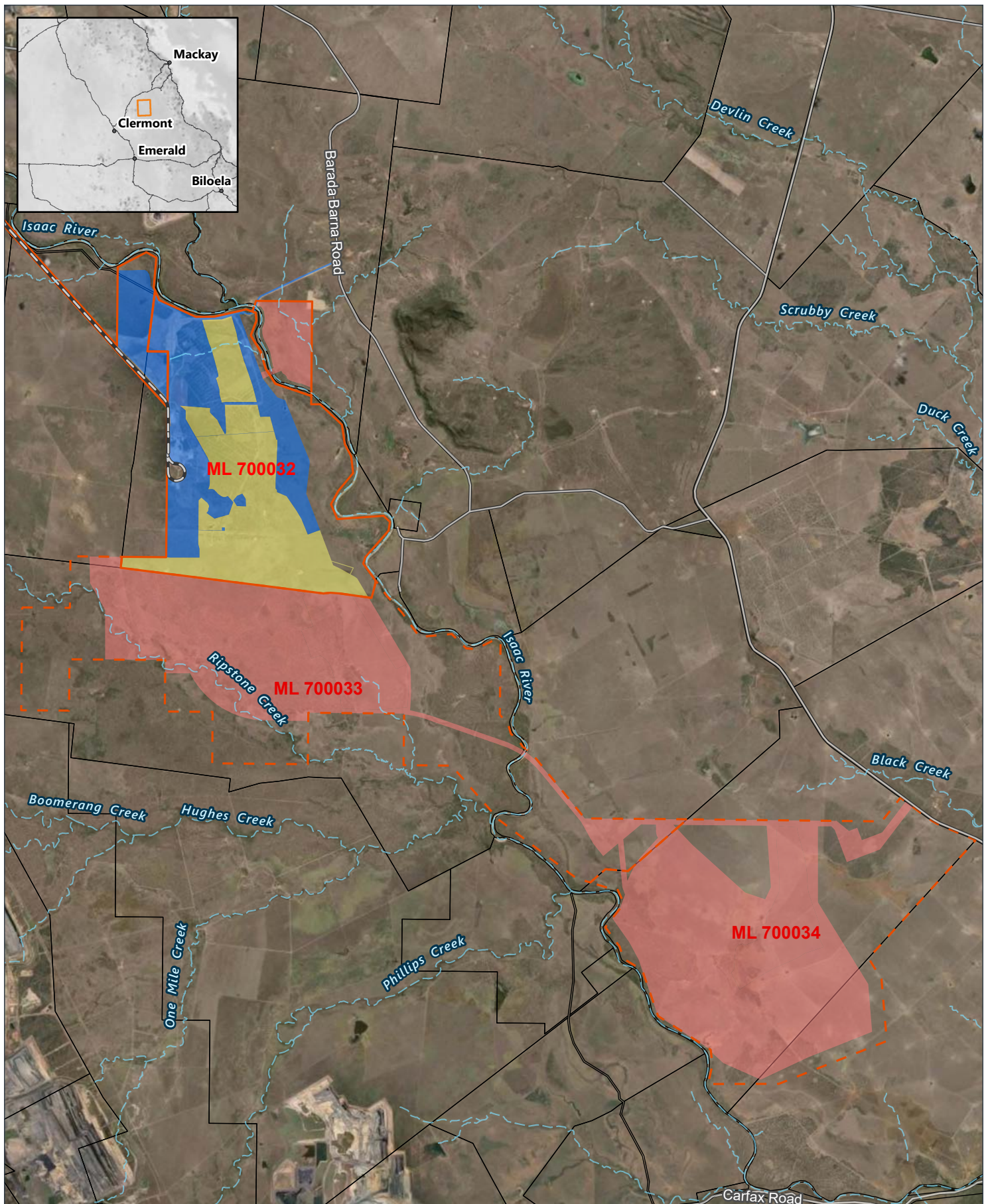
Section Error! Reference source not found. discusses compliance with MMP requirements to conduct monitoring of MNES values, habitats and environmental factors such as erosion and dust generation.

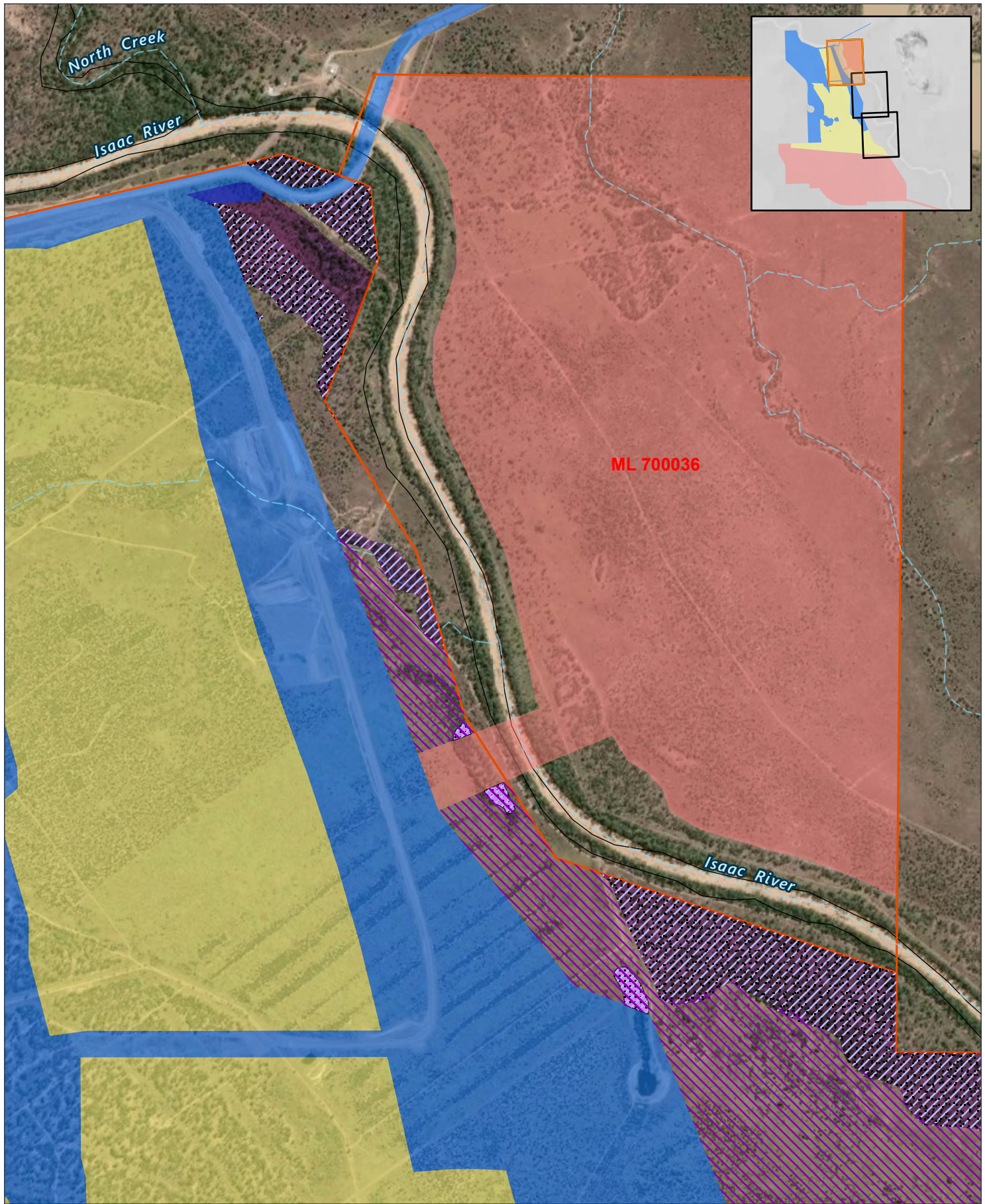
Section 4 discusses the reporting and administrative requirements of the MMP.

Section 5 of the report summarises the challenges associated with implementation of the MMP in Year 5, as well as any interventions or corrective actions implemented.

Section 6 provides a general conclusion and recommendations.

Due to their size, **Appendices A – E** are provided separately (not attached to this report). They are included in the Table of Contents and are referenced in text where appropriate.





Retained MNES species habitat

Figure 1.2

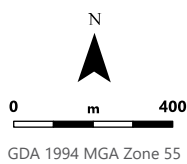
DWG No: PEM-001_071

DATE: 12/03/2026

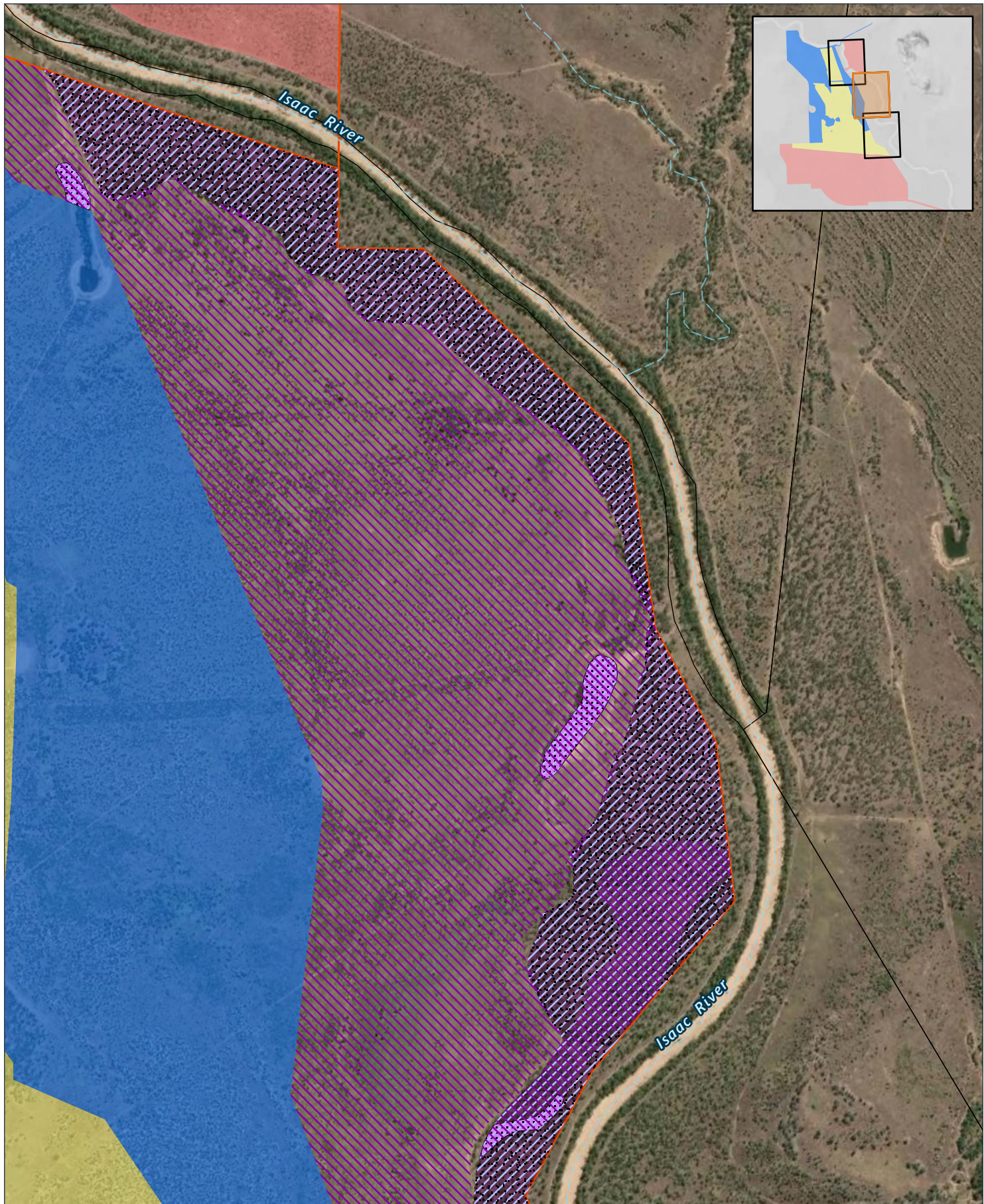
DRAWN: FM

REVIEWED EL

SCALE (A4): 1:19,000



- | | | |
|---------------------------------|--------------------------|--|
| Railways | ML permit granted | Greater Glider Breeding and Foraging Habitat |
| Roads | ML permit application | Koala Potential Breeding and Foraging Habitat |
| Watercourse Lines | Lot Type Parcel | Australian painted-snipe Breeding and Foraging Habitat |
| Stage 1 | Retained MNES habitats | |
| Stage 2 | Squatter Pigeon Habitat | |
| Future mine development stage/s | Ornamental Snake Habitat | |



Retained MNES species habitat

Figure 1.2

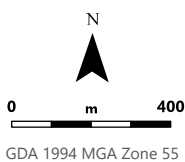
DWG No: PEM-001_071

DATE: 12/03/2026

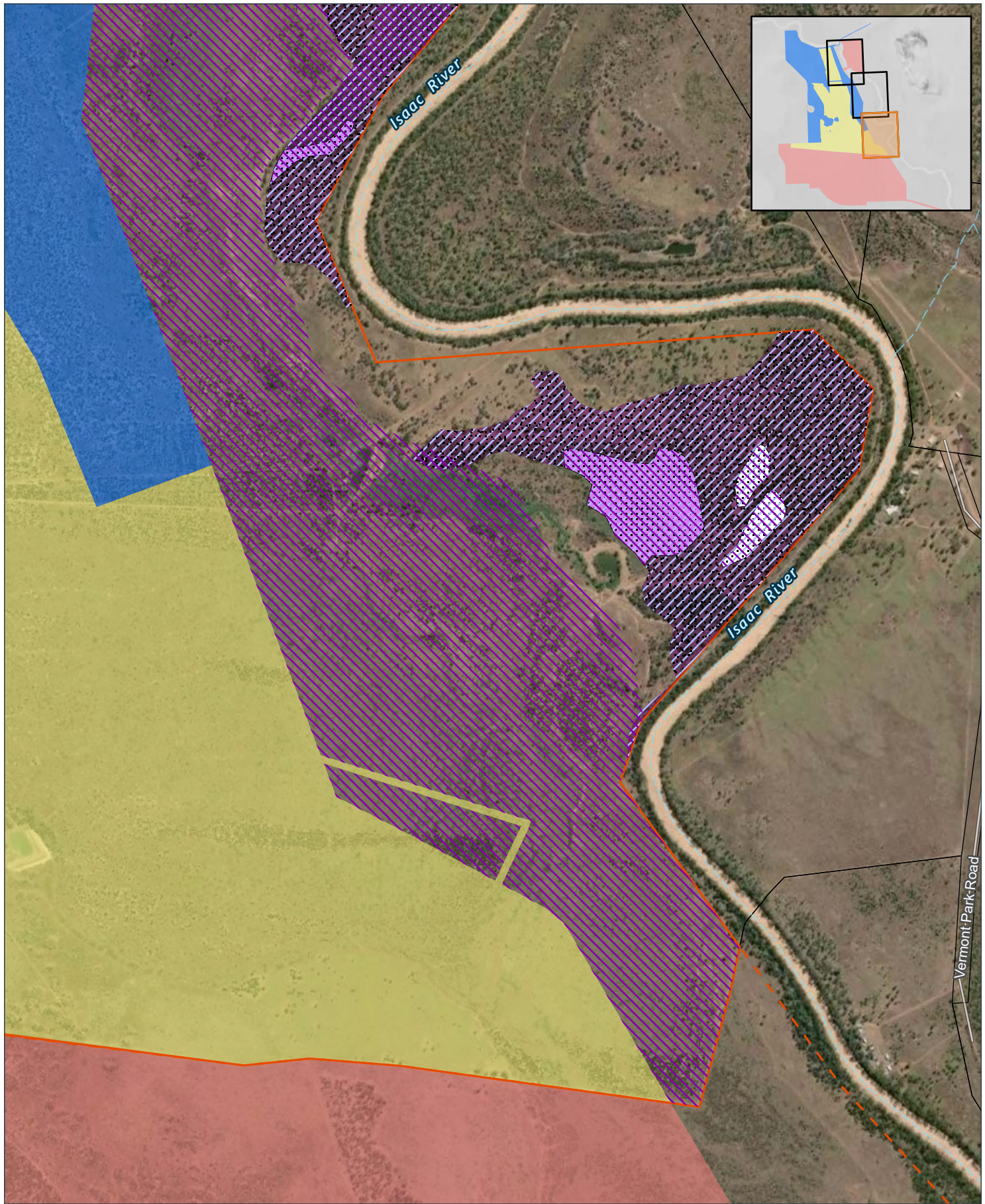
DRAWN: FM

REVIEWED EL

SCALE (A4): 1:19,000



- | | | |
|---------------------------------|--------------------------|--|
| Railways | ML permit granted | Greater Glider Breeding and Foraging Habitat |
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| Future mine development stage/s | Ornamental Snake Habitat | |



Retained MNES species habitat

Figure 1.2

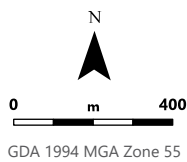
DWG No: PEM-001_071

DATE: 12/03/2026

DRAWN: FM

REVIEWED EL

SCALE (A4): 1:19,000



- | | | |
|---------------------------------|-------------------------------|--|
| Railways | ML permit application | Greater Glider Breeding and Foraging Habitat |
| Roads | Lot Type Parcel | Koala Potential Breeding and Foraging Habitat |
| Watercourse Lines | Retained MNES habitats | Australian painted-snipe Breeding and Foraging Habitat |
| Stage 1 | Squatter Pigeon Habitat | |
| Stage 2 | Ornamental Snake Habitat | |
| Future mine development stage/s | | |



2. MNES management

2.1 Vegetation clearance phase

Vegetation clearance for Stage 1 commenced in 2022 and activities within this area remained ongoing during the period. 2025a). Vegetation clearance for Stage 2 commenced in October 2025 and was ongoing during the period.

This section includes a table (**Table 2.2**) that addresses compliance with each of the performance criteria within the MMP that pertain to the vegetation clearance phase.

2.1.1 MNES habitat clearing limits

As permitted by the EPBC Act approval, and by the MMP, habitat clearing occurred in areas occupied by MNES and supporting associated habitats in Year 5. Clearance of MNES habitat in Stages 1 and 2 to date has been tracked and recorded by Pembroke, as required by the MMP, and is summarised in **Table 2.1**.

Table 2.1: Approved MNES habitat clearing limits (EPBC Permit 2017/7867, dated 1 August 2025) and area of habitat cleared by end of 2025 (Year 5)

MNES	Stage 1 approved clearing limit (ha)	Habitat cleared in Stage 1 (ha)	Stage 2 approved clearing limit (ha)	Habitat cleared in Stage 2 (ha) 2025*
Ornamental snake - important habitat	973.9	564.4	1,373.5	18.78
Squatter pigeon (southern) - breeding habitat	810.45	759.3	439.41	29.8
Squatter pigeon (southern) – foraging habitat	133.76	132.1	255.16	0
Greater glider habitat	932.81	913.1	741.43	29.8
Koala habitat	1,099	1,040.3	724	36.25
Australian painted snipe – breeding habitat	16	5.1	0	0
Brigalow TEC	0	0	0	0

* The habitat cleared in Stage 2 includes areas for exploration and mining purposes.

The MMP states that no clearing of native vegetation and/or disturbance to MNES habitats outside of the approved disturbance limits for each stage is to occur.

In Year 5, Pembroke is within the MNES habitat clearing limits specified in **Table 2.1** and is compliant with the EPBC Act approval. It is noted that there is inconsistency between the current approved MMP



and that this will be addressed through an amendment process which in accordance with the 2025 stage 2 EPBC Act Variation must be submitted to DCCEE prior to August 2026.

Additional performance criteria pertaining to the vegetation clearance phase are assessed in **Table 2.2**.



Table 2.2: Review of vegetation clearance phase performance criteria (see Table 4.1 of MNES Management Plan [EMM 2022])

Performance criteria	Management measure(s)	Compliance findings	Comments	Documentation
1. No clearing of native vegetation and/or disturbance to MNES habitats occurs outside of the approved disturbance limits for each stage	• Installation of delineation structures • Clearing limit inspection • Delivery of the Olive Downs induction program	Compliant.	Clearing teams provided with spatial files delineating approved clearance extents. Supervisor to confirm delineation structures are in place. Personnel and supervisor to physically inspect clearing boundaries. Clearing protocol adhered to. Clearing discussed with the Senior Environmental Advisor (refer section 4.3). Summary of MNES habitat clearing to date provided in Table 2.1.	Pembroke <i>Permits to Disturb</i> provided for clearance activities in 2025 (Permit 48 and Permit 51) have Task Specific Conditions referring to this performance criteria. Clearing procedure is also detailed in Pembroke site inductions, and discussed in daily pre-starts, toolbox talks, etc.
2. Avoid impacts to MNES habitat	• Where practical, retain areas of MNES habitats and/or mature, large trees, hollow-bearing trees or large stags as potential nesting and roosting habitat	Compliant.	Where possible, valuable habitat features (e.g. large hollow-bearing trees) were preserved during clearing activities. To date, this has typically occurred in areas close to the border of Project stages (K. Nicholas pers. comm. 2026).	Pembroke <i>Permits to Disturb</i> provided for clearance activities in 2025 (Permit 48 and Permit 51) have Task Specific Conditions referring to this performance criteria.
3. Maintain and protect a 200 m riparian corridor along Isaac River	• Establish an exclusion zone at the Isaac River riparian corridor • Installation of temporary delineation structures • Implement erosion and sediment control measures • Manage weeds and feral animals in Isaac River riparian corridor to maintain MNES values • Installation of grazing exclusion fencing	Compliant.	The retained MNES habitat and relevant riparian areas within the Project area were clearly demarcated in spatial software, on physical maps, no mining works or vegetation clearing occurred within the retained MNES habitat, and none of the proposed river crossings were developed during the period. Permanent signage demarcating the boundary of the retained MNES habitat area outside of the authorised mining disturbance area has now been installed, and access is limited to those conducting monitoring activities. Weed management was conducted within retained MNES habitat in the project area on multiple occasions during 2025, as well as targeted removal and mulching of lantana. Feral animal control was conducted within retained MNES habitat in the project area throughout 2025 by FVR Contracting. Three greater gliders were recorded as being killed	Weed spraying reports document weed control operations undertaken over multiple days during 6 months of the year. Faunalink Ecological (2025) provides further evidence of weed control activities. FVR Contracting provide quarterly feral animal mitigation reports. GreenLeaf Ecology monthly monitoring reports for August and September 2025 detail the feral cat predation events. Grazing exclusion fencing map provided.



Performance criteria	Management measure(s)	Compliance findings	Comments	Documentation
			and partially eaten by feral cats in 2025 (GreenLeaf Ecology 2025c, d). All three individuals were located within the retained MNES habitat area. As the two males were residents they had stable home ranges and the translocated female had established a stable home range and it had been nearly five months since her release into the retained MNES habitat area. Ongoing site operations and the translocation of the female were not believed to have increased the risk of cat predation of these three individuals. Since the first cat predations were recorded in January 2023, targeted cat control has been implemented through deployment of four felixer machines and a specialist shooter visiting the site four times per year. Other measures have included removal of refuge areas used by feral cats (i.e. lantana thickets and other weed dominated areas) in mid-2025. Due to these combined efforts, feral cat abundance and glider predation incidents have reduced over time. However, despite these efforts, feral cats are adaptable and transient and still occur on the site and would opportunistically prey on greater gliders if they encounter them (B Nottidge pers. comm. 2026). Grazing exclusion fencing was installed within particular sections of the current Stage 1 of the retained MNES habitat areas in 2025. Adjoining landholders have access to riparian areas via their properties and as such the riparian areas that are in close proximity are regularly inspected for cattle access and their owners notified to ensure this third-party activity is minimised where possible.	
4. Identify MNES utilising the site prior to clearing	Conduct pre-clearance ecology surveys	Compliant.	Pre-clearance surveys were conducted in accordance with the MMP by GreenLeaf Ecology.	GreenLeaf Ecology (2025a, b). Appendix A.



Performance criteria	Management measure(s)	Compliance findings	Comments	Documentation
5. Reduce impacts on native wildlife through relocation to adjacent habitats	Identify appropriate release sites for MNES species	Compliant.	Areas suitable for each species likely to be encountered have been previously identified within the retained MNES habitat area (EMM 2025a). This relates to all fauna during the clearing program., with the exception of koala as per best practice for this species	Photos of ecologists / fauna spotter catchers conducting sequential clearing using EWP's provided. Fauna spotter catcher wildlife log provided.
6. No injury or mortality to Koalas during clearing	Koala tagging and monitoring pilot for Stage 1	Compliant	No koalas were injured or killed during clearing activities.	GreenLeaf Ecology and Endeavour Veterinary Ecology monthly koala monitoring / Olive Downs Koala and Greater Glider Clinic reports from 2025. Appendix B
7. Habitat features retained for rehabilitation	Salvage and reuse of habitat features such as hollows	Compliant.	Timber has been salvaged from clearing activities conducted in 2025 and used to build fauna furniture, as well as artificial hollows (nest boxes).	Provision of images showing retained timber used to construct fauna furniture and artificial hollows. GreenLeaf Ecology monthly reporting describes usage of salvaged tree hollows by greater gliders.
8. Native seeds are salvaged for rehabilitation	Seed collection within the Project area	Non-compliant.	Internal planning for commencement of a seed collection program commenced in 2025. At this stage there has been limited rehabilitation taking place as most areas cleared have been required for construction and operations.	NA
9. Greater glider breeding habitat is supplemented	Install nest boxes for greater glider	Compliant.	Installation of nest boxes is ongoing; 545 boxes have been installed in Stage 1 retained MNES habitat areas and >200 have been installed in Stage 2 retained habitat areas to date.	<i>Greater Glider Nest Box Monitoring 2025</i> (Faunalink Ecological 2026). Appendix C.
10. All site personnel are trained and aware of MNES	Delivery of the Olive Downs induction program	Compliant.	MNES training delivered during site induction process.	Thiess-Pembroke MNES Education Powerpoint presentation.
11. MNES species are handled safely and correctly	- Supervision of clearing by fauna spotter catcher - Fauna relocation by suitably qualified fauna spotter catchers	Compliant.	Fauna spotter catchers have been present during all clearing activities in accordance with the MMP, and have ensured that any relocation is conducted in accordance with the MMP. This excludes koalas which were left to relocate of their own accord as per the requirements of the MMP.	Pembroke <i>Permits to Disturb</i> provided for clearance activities in 2025 (Permit 48 and Permit 51) have Task Specific Conditions referring to this performance criteria. Theiess-Pembroke Wildlife Interactions Powerpoint.



Performance criteria	Management measure(s)	Compliance findings	Comments	Documentation
				Photos of ecologists / fauna spotter catchers conducting pre-clearance tree hollow checks using EWP's provided. Post-clearance reporting 2025. Fauna spotter catcher wildlife log provided. Appendix D.
12. Vegetation is cleared sequentially	Two phase clearing of vegetation	Compliant.	Clearing of vegetation in 2025 was conducted in accordance with the MMP.	Pembroke <i>Permits to Disturb</i> provided for clearance activities in 2025 (Permit 48 and Permit 51) have Task Specific Conditions referring to this performance criteria. Photos of ecologists / fauna spotter catchers conducting sequential clearing using EWP's provided. Appendix A and Appendix D.
13. Reporting to be submitted post clearing phase. Report to document mitigation measures implemented, any injuries or mortality and key learnings	Post clearing report	Compliant.	Post clearance reports have previously been prepared for Project clearing activities in 2024 (EMM 2024), and were prepared by GreenLeaf Ecology in 2025.	Post-clearance reporting 2025. Appendix D
14. Prevent vehicle strike on MNES	- Reduce and enforce speed limits - Install wildlife signage	Compliant.	Speed limits on site are enforced. Wildlife signage has been installed at appropriate locations. Safe driving techniques covered in site inductions. Notifications have been given in pre-start meetings relating to tagged koalas in proximity to project infrastructure Trial of virtual fencing ongoing. 'Live' koala signage deployed when monitored koalas approach vehicle tracks.	Photos provided showing wildlife signage and virtual fencing. Theiss-Pembroke Wildlife Interactions Powerpoint. GreenLeaf Ecology monthly reporting describes deployment of 'live' koala signage in proximity to tracks. Appendix A.



Performance criteria	Management measure(s)	Compliance findings	Comments	Documentation
15. Grazing is excluded from riparian zones on land associated with Stage 1 (outside of construction areas)	Installation of grazing exclusion fencing	Compliant	Grazing exclusion fencing was installed within particular sections of the current Stage 1 of the retained MNES habitat areas in 2025. Adjoining landholders have access to riparian areas via their properties and as such the riparian areas that are in close proximity are regularly inspected for cattle access and their owners notified to ensure this third-party activity is minimised where possible. Cattle grazing and full exclusion is only possible within active mining disturbance areas, active within the approved mining leases that form the Project Area. Note that barbed wire has been removed wherever practicable; where not possible, visual indicators have been added to the top strand of barbed wire (K. Nicholas pers. comm. 2026).	Grazing exclusion fencing map.
16. Prevent the introduction and/or spread of weeds and/or disease within the Project area	Hygiene protocols	Compliant.	Olive Downs manages weeds within the Project Area in keeping with Environmental Authority EA0001976, condition H21 Weed Management. Additionally, the Queensland Government's Weed Hygiene declaration is used for vehicles accessing areas outside of mining activities where required. Weed hygiene protocols are covered in <i>Permits to Disturb</i>, which have Task Specific Conditions referring to this performance criteria. Multiple washdown bays are available on site. Weed management was conducted within the retained MNES habitat on multiple occasions during 2025, as well as targeted removal and mulching of lantana.	Pembroke <i>Permits to Disturb</i> provided for clearance activities in 2025 (Permit 48 and Permit 51) have Task Specific Conditions referring to this performance criteria. Weed spraying reports document weed control operations undertaken over multiple days during 6 months of the year.



Performance criteria	Management measure(s)	Compliance findings	Comments	Documentation
17. Prevent soil runoff into watercourses	Erosion and sediment control measures are implemented	Compliant.	The site <i>Erosion and Sediment Control Plan</i> details appropriate procedures for preventing erosion and sedimentation. <i>Permits to Disturb</i> contain a section discussing alteration of overland flow.	<i>Erosion and Sediment Control Plan</i>. Pembroke <i>Permits to Disturb</i> provided for clearance activities in 2025 (Permit 48 and Permit 51) have Task Specific Conditions referring to this performance criteria.
18. Prevent increased levels of dust	- Dust monitoring - Watering of dirt tracks - Reduce and enforce speed limits	Compliant.	Speed limits on site are enforced. Safe driving techniques are covered in site inductions. Dust suppression vehicles operate within the Project area, and on Barada-Barna Road (site access road).	Monthly dust deposition monitoring and automated air quality monitoring is being undertaken on site in accordance with the Project's <i>Air Quality Management Plan</i>. Dust suppression is conducted when necessary within the Project area and along Barada Barna Road. There have been no compliance breaches with regards to the Environmental Authority (EA) issued to the Project. Environmental Authority EA0001976 – Olive Downs Coal Mine, Schedule B: Air, Condition number B6 Dust Management Plan
19. Maintain habitat for MNES outside of the approved disturbance limits	Habitat quality is maintained in MNES habitats outside of approved clearing areas for Stage 1	Compliant.	Weed management was conducted within the retained MNES habitat areas on multiple occasions during 2025, as well as targeted removal and mulching of lantana (removal of fuel load). Feral animal control was conducted within the retained MNES habitat in the project area throughout 2025 by FVR Contracting. Grazing exclusion fencing was installed along the southern boundary of the retained MNES habitat area in 2025 and third-party cattle grazing was monitored and communicated as required.	Weed spraying reports document weed control operations undertaken over multiple days during 6 months of the year. Faunalink Ecological (2025) provides further evidence of weed control activities. FVR Contracting quarterly feral animal mitigation reports. Appendix E.



Performance criteria	Management measure(s)	Compliance findings	Comments	Documentation
20. No uncontrolled fire events as a result of Project activities	• Maintain access tracks and fire breaks • Maintain and use firefighting equipment • Manage fuel loads	Compliant.	Maintenance of access tracks and firebreaks was conducted by Pembroke in 2025. Lantana removal and mulching was conducted within the retained MNES habitat in the project area. All firefighting equipment on site is subject to routine examination. Sites HQ2 and HQ6 were noted to be exceeding 8t/ha in November 2025 and will be incorporated into the fuel load reduction campaigns in 2026 by either slashing, mulching or cool burns (K. Nicholas pers. comm. 2026).	Access track and firebreak maintenance map. Lantana mulching map.



2.2 Construction phase

Construction of mine infrastructure for Stage 1 commenced in 2022 and concluded in 2024. No major construction activities outside of mining operations occurred during the reporting period.



2.3 Operation and decommissioning phases

Operation (i.e. mining related activities) occurred within stage 1 and 2 areas during the period (refer Section 1).

This section includes a table (**Table 2.3**) that addresses compliance with each of the performance criteria within the MMP that pertain to the operation phase; note that decommissioning will not commence until operations cease.



Table 2.3: Review of operations and decommissioning phase performance criteria (from Table 4.3 of MNES Management Plan [EMM 2022])

Performance criteria	Measure(s)	Compliance findings	Comments	Documentation
1. Maintain koala and greater glider connectivity	• Maintain Koala exclusion fencing and escape poles • Maintain glider rope crossings	Compliant.	Permanent koala exclusion fencing has been installed at several key locations within the Stage 1 area, along with koala 'furniture' allowing safe passage through culverts, beneath bridges, etc. Stage 1 Greater Glider rope crossings were installed in 2024, and were inspected twice to ensure integrity in 2025.	Photos and videos of koala 'furniture' at culverts and bridges provided. Photos of inspection forms provided by Pembroke.
2. Prevent dog attacks to native fauna	• No domestic dogs on site • Wild dogs will be controlled	Compliant.	Feral animal control was conducted within the retained MNES habitat areas throughout 2025 by FVR Contracting; FVR mention that dingoes are assisting in suppressing the local feral cat population and recommend they are not targeted in feral animal control.	FVR Contracting quarterly feral animal mitigation reports. Appendix E.
3. Prevent vehicle strike on MNES	• Reduce and enforce speed limits • Install wildlife signage	Compliant.	Speed limits on site are enforced. Wildlife signage has been installed at appropriate locations. Safe driving techniques covered in site inductions. Notifications have been given in pre-start meetings relating to tagged koalas in proximity to project infrastructure. Trial of virtual fencing ongoing. 'Live' koala signage deployed when monitored koalas approach vehicle tracks.	Photos provided showing wildlife signage and virtual fencing. Theiss-Pembroke Wildlife Interactions Powerpoint. GreenLeaf Ecology monthly reporting describes deployment of 'live' koala signage in proximity to tracks. Appendix C.
4. Removal and exclusion of grazing from riparian zones	• Grazing is excluded from riparian zones on land associated with Stage 1 (outside of construction areas) • Wildlife friendly fencing is used	Compliant.	Grazing exclusion fencing was installed within particular sections of the current Stage 1 of the retained MNES habitat areas in 2025. Adjoining landholders have access to riparian areas via their properties and as such the riparian areas that are in close proximity are regularly inspected for cattle access and their owners notified to ensure this third-party activity is minimised where possible. Cattle grazing and full exclusion is only possible within active mining disturbance areas, active within the approved mining leases that form the Project Area. Note that barbed wire has been removed wherever practicable; where not possible, visual indicators	Grazing exclusion fencing map



Performance criteria	Measure(s)	Compliance findings	Comments	Documentation
			have been added to the top strand of barbed wire (K. Nicholas pers. comm. 2026).	
5. Prevent the introduction and/or spread of weeds and/or disease within the Project area	Hygiene protocols	Compliant.	Olive Downs manages weeds within the Project Area in keeping with Environmental Authority EA0001976, condition H21 Weed Management. Additionally, the Queensland Government's Weed Hygiene declaration is used for vehicles accessing areas outside of mining activities where required. The site induction contains information pertaining to weed washdowns and weed hygiene practices. Weed hygiene protocols are covered in site inductions and in <i>Permits to Disturb</i>, which have Task Specific Conditions referring to this performance criteria. A weed washdown bay is available on site. Weed management was conducted within the retained MNES habitat in the project area on multiple occasions during 2025, as well as targeted removal and mulching of lantana.	Pembroke <i>Permits to Disturb</i> provided for clearance activities in 2025 (Permit 48 and Permit 51) have Task Specific Conditions referring to this performance criteria. Weed spraying reports document weed control operations undertaken over multiple days during 6 months of the year.
6. Prevent soil runoff into watercourses	Erosion and sediment control measures implemented	Compliant.	The site <i>Erosion and Sediment Control Plan</i>, developed as per the requirements of EA0001976, details appropriate procedures for preventing erosion and sedimentation. <i>Permits to Disturb</i> contain a section discussing alteration of overland flow.	<i>Erosion and Sediment Control Plan</i>. Pembroke <i>Permits to Disturb</i> provided for clearance activities in 2025 (Permit 48 and Permit 51) have Task Specific Conditions referring to this performance criteria.
7. Reduce light spill into adjacent habitat	Direct lighting away from MNES habitats	Compliant.	No lighting for operational works is directed at or along the retained MNES habitat area. In pit lighting is directed towards infrastructure, maintained within the boundaries of the Levee, located away from the retained MNES habitat area or, where possible, directed away from areas of MNES habitat.	Lighting has been installed in accordance with the MMP; site inspections by the Pembroke Environment Team have confirmed this within the Isaac River riparian area (K. Nicholas pers. comm. 2026). Verbal confirmation that lighting is directed towards operational areas and targeted to manage in-pit visibility. Lighting is managed in keeping with Coal Mine Health and Safety obligations.
8. Ensure all site personnel are trained and aware of MNES	Delivery of the Olive Downs induction program	Compliant.	MNES training delivered during site induction process.	Thiess-Pembroke MNES Education Powerpoint presentation.



Performance criteria	Measure(s)	Compliance findings	Comments	Documentation
9. Ensure safe handling of MNES	Fauna handling to be undertaken in accordance with Appendix B of the MMP.	Compliant.	Fauna spotter catchers and/or ecologists are utilised to safely remove any MNES fauna encountered in construction areas in accordance with the MMP (with the exception of Koala which is to be left to leave of its own accord as per the MMP).	Theiss-Pembroke Wildlife Interactions Powerpoint. Photos of ecologists / fauna spotter catchers handling fauna provided by Pembroke.
10. Ensure no reduction in habitat quality within adjacent areas will occur as a result of the Project	Habitat quality is maintained in MNES habitats outside of approved clearing areas for Stage 1	Compliant.	Weed management was conducted within retained MNES habitat in the project area on multiple occasions during 2025, as well as targeted removal and mulching of lantana (removal of fuel load). Feral animal control was conducted within retained MNES habitat in the project area throughout 2025 by FVR Contracting. Three greater gliders were recorded as being killed and partially eaten by feral cats in 2025 (GreenLeaf Ecology 2025c, d). All three individuals were located within the retained MNES habitat area. As the two males were residents they had stable home ranges and the translocated female had established a stable home range and it had been nearly five months since her release into the retained MNES habitat area. Ongoing site operations and the translocation of the female were not believed to have increased the risk of cat predation of these three individuals. Since the first cat predations were recorded in January 2023, targeted cat control has been implemented through deployment of four felixer machines and a specialist shooter visiting the site four times per year. Other measures have included removal of refuge areas used by feral cats (i.e. lantana thickets and other weed dominated areas) in mid-2025. Due to these combined efforts, feral cat abundance and glider predation incidents have reduced over time. However, despite these efforts, feral cats are adaptable and transient and still occur on the site and would opportunistically prey on greater gliders if they encounter them (B Nottidge pers. comm. 2026).	Weed spraying reports document weed control operations undertaken over multiple days during 6 months of the year. FVR Contracting quarterly feral animal mitigation reports. Faunalink Ecological (2025) provides further evidence of weed control activities. GreenLeaf Ecology's monthly monitoring reports for August and September detail the feral cat predation events. Appendix E and Appendix C.
11. Minimise residual impacts to MNES through progressive rehabilitation post mining	Progressive rehabilitation	NA.	Mining activities are ongoing in Stage 1 and stage 2 areas. No progressive rehabilitation occurred during the period.	NA.



3. MNES monitoring

Pembroke undertakes a monitoring program to ensure the MMP meets the environmental outcomes and performance criteria that have been established (EMM 2022).

The results of the monitoring program will be used to ensure identified avoidance, mitigation and management measures are being implemented effectively, to inform operational management decisions and adaptive management of this MMP. Monitoring will detect the attainment/maintenance of interim performance targets and environmental outcomes and determine if corrective actions are required.

The monitoring methods are:

- specific to the MNES and performance criteria being assessed
- designed to enable a determination if a criteria has been achieved or whether corrective actions are needed
- quantitative and repeatable such that changes over time can be observed through the comparison of monitoring events.

Monitoring conducted in Year 5 is summarised in **Table 3.1** below.



Table 3.1: Review of compliance with MNES Management Plan monitoring commitments

Monitoring component (and relevant section of MMP)	Methodology	Compliance findings	Comments	Documentation
Project area inspections (Section 6.1)	General Project area inspection conducted by a Pembroke environmental representative, to be conducted twice per year, to ensure: 1. Compliance with vegetation clearing limits. 2. Maintenance of access tracks and firebreaks. 3. Efficacy of erosion and sediment control. 4. Efficacy and integrity of fauna crossing structures, fencing, gates and vehicle speed signs. 5. Compliance with hygiene protocols. 6. Efficacy and integrity of livestock exclusion fencing both permanent and temporary. 7. Any occurrence of land degradation, erosion or weed infestation.	Compliant.	Vegetation clearance limits have been adhered to (Table 2.1). Maintenance of access tracks and firebreaks was conducted in 2025. General site inspections in accordance with the MMP are conducted on a regular basis (K. Nicholas pers. comm. 2026). General project area inspections for environmental management purposes are conducted in accordance with the requirements of EA0001976. This includes but is not limited to: Access track and firebreak maintenance Erosion and sediment control monitoring and management; and Weed and pest management activities.	Clearing totals presented in Table 2.1. Access track and firebreak maintenance map provided by Pembroke. Photos of inspection forms provided by Pembroke.
Greater glider crossings and nest box monitoring (Section 6.2).	Rope ladder crossings monitored using remote camera traps. Rope crossings inspected for damage twice annually, and replaced immediately if damaged. Nest boxes to be visually inspected 6 months after installation, and then annually for the first 3 years.	Compliant.	Both rope crossing structures were inspected for damage twice in 2025, with maintenance of weeds around their base conducted following recommendations from the inspection. Nest boxes were last monitored between October 2024 and January 2025 (EMM 2025b) and then between June to August 2025 (Faunalink Ecological 2026). Ten nest box monitoring cameras have been installed so far.	Photos of inspection forms provided by Pembroke. <i>Olive Downs Coking Coal Project Nest Box Monitoring Report - Round 4</i> (EMM 2025b). <i>Greater Glider Nest Box Monitoring 2025</i> (Faunalink Ecological 2026).



Monitoring component (and relevant section of MMP)	Methodology	Compliance findings	Comments	Documentation
Habitat quality monitoring (Section 6.3)	Habitat quality monitoring (HQM) of 10 established survey sites within Stage 1 retained habitat areas to be conducted annually for the first 5 years of the MMP. Results from each monitoring event will be compared to establish that habitat quality has not decreased overall, and any particular individual criteria have not worsened (i.e. weed cover, canopy cover, recruitment etc).	Compliant.	HQM was completed in 2025 by Faunalink Ecological. Habitat quality scores decreased relative to the baseline scores at 2 of the 10 sites monitored (HQ1 and HQ6). All other sites showed small improvements over baseline. FaunaLink Ecological (2025) suggested that "Weed presence and exotic pasture dominance continue to be the most prominent ecological pressures (at the HQM sites), particularly at sites HQ5 and HQ9 where habitat quality remains low. These areas are characterised by exotic grasses with limited structural vegetation." This was determined to be due to high annual rainfall totals (FaunaLink 2025). Targeted weed control is continuing within the retained habitat areas (directly informed by weed monitoring results), and should start to reduce weed cover as the weed seed bank in the soil depletes. They suggest targeted weed control and / or the use of strategic grazing and / or the use of cool burns to improve diversity in the ground layer at these sites.	<i>Ecology Monitoring Report 2025</i> (Faunalink Ecological 2025).
Photo monitoring (Section 6.3.1)	In areas where active management is being undertaken, photo monitoring offers a simple and effective visual means by which to capture the response of the vegetation to management actions. Photo monitoring is to be conducted at the same time as habitat quality monitoring described above.	Compliant.	Photo monitoring completed in 2025 by Faunalink Ecological. No discussion of photo monitoring was provided, though photos were provided in Appendix A, and could be compared to the photos in EMM (2025).	<i>Ecology Monitoring Report 2025</i> (Faunalink Ecological 2025).



Monitoring component (and relevant section of MMP)	Methodology	Compliance findings	Comments	Documentation
Habitat utilisation monitoring (Section 6.3.2)	Habitat utilisation monitoring (HUM) of retained MNES habitats will be undertaken to ensure habitat utilisation by the target MNES fauna species is successfully maintained throughout the project life. For the first five years this will be within retained MNES habitat areas on land owned by Pembroke. HUM includes: Spotlighting in mapped suitable habitat for ornamental snake to confirm ongoing presence of species. Deployment of 5 remote camera traps at water sources for three nights, and diurnal bird surveys at each HQM site targeting squatter pigeon. Surveying (spotlighting) a 21 km length of the Isaac River for koala and greater glider. Surveying 10 permanent transects with nocturnal thermal drone surveys for koala.	Compliant.	HUM was completed in 2025 by Faunalink Ecological. Three ornamental snakes were detected during spotlighting surveys. No squatter pigeons were detected on remote cameras or during diurnal bird surveys conducted by Faunalink, but squatter pigeons were recorded by remote cameras monitoring the fauna culverts, and incidentally throughout 2025. Fifty-six (56) greater gliders were recorded across four nights of spotlighting and thermal drone surveys. Three koalas were detected during thermal drone surveys.	<i>Ecology Monitoring Report 2025</i> (Faunalink Ecological 2025). Photos and videos from remote cameras set to monitor fauna culverts provided by Pembroke.
Weed monitoring (Section 6.4)	Weed monitoring to be conducted at each of the 10 HQM sites, as well as at 6 previously established weed monitoring plots.	Compliant.	Weed monitoring was completed in 2025 by Faunalink Ecological. Since baseline surveys were conducted in 2021, weed cover at most monitoring sites has increased. Targeted weed control is recommended in areas of dense infestation.	<i>Ecology Monitoring Report 2025</i> (Faunalink Ecological 2025).
Pest animal monitoring (Section 6.5)	Pest animal surveys will be undertaken annually for the first three years within the Isaac River corridor, followed by every two years for the remainder of the Project in conjunction with, (and at the same survey locations as) the MNES habitat quality assessment surveys.	Not applicable.	Pest animal surveys were completed by Faunalink Ecological in 2025. These surveys indicated an increase in the numbers of feral pigs present within the retained MNES habitat area.	<i>Ecology Monitoring Report 2025</i> (Faunalink Ecological 2025).



Monitoring component (and relevant section of MMP)	Methodology	Compliance findings	Comments	Documentation
Dust monitoring (Section 6.6)	Pembroke will implement proactive and reactive dust control measures as described in the <i>Olive Downs Air Quality Management Plan</i> to maintain the air quality objectives of that plan.	Compliant.	Monthly dust deposition monitoring and automated air quality monitoring is being undertaken on site in accordance with the Project's <i>Air Quality Management Plan</i> . Dust suppression is conducted in keeping with the air quality management plan requirements for the Project area. There have been no compliance breaches with regards to the EA issued to the Project.	<i>Air Quality Management Plan.</i>
Noise and vibration monitoring (Section 6.7)	Pembroke will implement proactive and reactive noise control measures. To reduce noise emissions at the nearest sensitive receptors throughout the life of the Project, Pembroke will enclose a portion of the overland conveyor and utilise low noise idlers.	Compliant.	Automated noise and vibration monitors are installed at the nearest sensitive receptors as per Schedule D of the Environmental Authority conditions and in accordance with Pembroke Olive Downs-Noise Management Plan and Blast Management Plan. The overland conveyor is planned for construction in Stage 3 and does not form part of the current operational phases.	<i>Noise Management Plan.</i>
Erosion and sediment control (Section 6.8)	During vegetation clearing and construction phases, erosion and sediment control measures will be inspected by a suitably qualified person on a monthly basis, as well as following any significant rainfall event in accordance with the <i>Erosion and Sediment Control Plan</i> for the Project.	Compliant.	The site <i>Erosion and Sediment Control Plan</i> details appropriate procedures for preventing erosion and sedimentation. General site inspections in accordance with the MMP are conducted on a regular basis (K. Nicholas pers. comm. 2026).	<i>Erosion and Sediment Control Plan.</i>



Monitoring component (and relevant section of MMP)	Methodology	Compliance findings	Comments	Documentation
Fire and fuel load monitoring (Section 6.9)	Thresholds for biomass and fuel load are outlined in the grazing management section (Section 5.2.3) of the MMP. Monitoring of weed cover, biomass cover and height of dominant grasses will occur every month while grazing is occurring. This monitoring will be undertaken on an ongoing basis for the life of the Project by the site manager who is responsible for managing livestock and meeting requirements under this MMP.	Compliant.	Fuel load monitoring via rapid assessment is conducted on a regular basis (K. Nicholas pers. comm. 2026); this is intended to inform planning for fire control activities. Grazing is no longer occurring within impact areas.	Survey123 form designed for fuel load monitoring of the offset areas is now being used on the impact areas.



4. Reporting and administration

4.1 Reporting

An annual compliance report is to be prepared at the end of each calendar year. The report will summarise:

- all management actions that have been completed in that 12-month period
- all monitoring that has been completed and monitoring results
- assessment of monitoring results against performance criteria and five-year interim milestones to determine if they are being and or likely to be met
- identification of any issues that arose that required intervention or corrective actions to be implemented.

This document represents the second annual report to have been prepared for the Project, and evaluates Year 5 of the implementation of the MMP.

4.2 Review of MNES Management Plan

A formal review of the MMP is required to commence 12 months prior to the completion of a Project stage and/or be concluded 12 months prior to the commencement of the next Project stage. The last formal review of the MMP was completed by EMM Consulting in 2024 to facilitate the commencement of Stage 2 activities.

No formal review of the MMP was required in 2025. A formal review of the MMP is planned following conclusion of the five-year interim report.

4.3 Responsibilities

All personnel undertaking Project activities are responsible for adhering to the management strategies outlined within this plan. The MMP reflects construction related position descriptions and for the purposes of this audit the following accountabilities are noted:

1. Project Director (MMP reference) is now the Head of Approvals & Environment and is accountable for initiating formal reviews of MMP.
2. Project Environment Manager (MMP reference) is now the Senior Environmental Advisor and is responsible for:
 - a. ensuring implementation of prescribed avoidance, mitigation and management strategies for each phase within this plan
 - b. review results of the review and ensure corrective actions are implemented in a timely and effective manner; and
 - c. record keeping including extents of disturbance for each Phase.
3. Project Site Manager (MMP reference) is now the General Manager, Operations and is accountable for ensuring this MMP is implemented during Project clearing, construction, operation and decommissioning phases.

All responsible persons are aware of their responsibilities under the MMP.



4.4 Data management

The Pembroke Head of Approvals & Environment will be responsible for overseeing and managing all monitoring activities and programs required as part of this MMP. This will include maintaining data records to informing how mitigation and monitoring efforts are tracking towards interim milestones as per the requirements of Condition 46(g) of the EPBC Act approval which states that frequency of monitoring must be sufficient to track progress towards each set of milestones, and sufficient to determine whether the milestones are likely to be achieved.

Data will include field survey data forms, reports, spatial data, camera footage and photos. If required, this data will be made available to DCCEEW upon request; a summary is provided in the compliance tables above.

In 2025, data has been maintained as per the requirements of the MMP; in accordance with *Sensitive Ecological Data – Access and Management Policy V1.0*. (DoE 2016), none of the data pertaining to this report is considered to be 'Sensitive Ecological Data'.

4.5 Incident reporting

Should an incident occur to a MNES such as vehicle strike, or injury or death during vegetation clearing, the Pembroke Senior Environmental Advisor will be notified within 24 hours. An internal review of the incident will be undertaken and an incident report prepared within 5 business days of the Senior Environmental Advisor receiving the notification.

The incident report will include recommendations as to any corrective actions that may be required to prevent the incident reoccurring.

Incident reports for each year are to be included in the annual compliance reports. There were no instances of MNES injury or death resulting from vehicle strike or vegetation clearing in 2025 (K. Nicholas pers. comm. 2026). There were no incidents to report that were applicable to the MMP; as such, no incident reports are appended.

No new environmental risks were recorded in the reporting period.

5. Identified constraints to monitoring and management

There were no major constraints to monitoring and management actions identified during the reporting period. Some minor constraints were identified in reporting reviewed for the preparation of this annual report and review of the supporting monitoring and clearing reports. These are summarised below:

- The MMP requires amendment, as planned for the upcoming period, to ensure it is reflective of the current operational activities and organisational practices.
- Native seed collection has not commenced; this is largely due to ongoing discussions about methodology, timing and approach.
- One weed monitoring site was inundated and unable to be surveyed (Faunalink Ecological 2025).

6. Conclusion and recommendations

In general, Pembroke were compliant with the majority of the performance criteria set out in the MMP for the Project.



A non-compliance was noted for the following performance criteria:

- Native seeds (to be) salvaged for rehabilitation.

The following recommendations may assist in improving outcomes for MNES on an ongoing basis, and could be incorporated into a revised MMP.

- Water sources in proximity to the retained MNES habitat areas to be checked for weed incursion / water quality. Faunalink Ecological noted that weed cover in proximity to the water sources monitored for squatter pigeon was high and may have contributed to the lack of records of the species in 2025 during targeted monitoring.
- Continued reduction of weed cover through weed management program, in combination with targeted reseeding of appropriate native species in areas lacking in understorey. Avoid, as much as practicable, damage to existing canopy trees and other native vegetation. Pembroke are proactively managing this, with the selection of a new weed management contractor in 2025 (K. Nicholas pers. comm. 2026).
- While washdown bays are available on site, and all site vehicles are generally weed-free, a requirement for vehicle hygiene inspection prior to entry to retained MNES habitat outside of authorised disturbance areas is recommended to further minimise the risk of weed incursion.
- Review of remaining areas of barbed wire fencing in proximity to retained MNES habitat within approved project areas, with continued removal of barbed wire sections if possible. Pembroke are proactively managing this on an ongoing basis, with barbed wire to be removed wherever practicable; where not possible, visual indicators have been added to the top strand of barbed wire (K. Nicholas pers. comm. 2026).

7. References

EMM (EMM Consulting Pty Ltd (2022), *MNES Management Plan Olive Downs Coking Coal Project v2*, report prepared for Pembroke Olive Downs Pty Ltd by EMM.

- (2025a), *MNES Annual Report Olive Downs Coking Coal Project*, report prepared for Pembroke Olive Downs Pty Ltd by EMM.
- (2025b), *Olive Downs Coking Coal Project Nest Box Monitoring Report - Round 4*, report prepared for Pembroke Olive Downs Pty Ltd by EMM.

DCCEEW (Department of Climate Change, Energy, the Environment and Water) (2019), *Independent Audit and Audit Report Guidelines*, Commonwealth of Australia, available online:

<https://www.dcceew.gov.au/environment/epbc/publications/independent-audit-report-guidelines>.

DoE (Department of the Environment) (2016), *Sensitive Ecological Data - Access and Management Policy*, Commonwealth of Australia, available online:

<https://www.dcceew.gov.au/sites/default/files/documents/sensitive-ecological-data-access-mgt-policy.pdf>.

GreenLeaf Ecology (2025a), *Pre-Clearance Survey Report: Olive Downs Coking Coal Project July 2025*, report prepared for Pembroke Olive Downs PTY Ltd by GreenLeaf Ecology.

- (2025b), *Pre-Clearance Survey Report: Olive Downs Coking Coal Project November 2025*, report prepared for Pembroke Olive Downs PTY Ltd by GreenLeaf Ecology.



- (2025c), *GLE_ODC_August Monthly Report 2025*, report prepared for Pembroke Olive Downs PTY Ltd by GreenLeaf Ecology.
- (2025d), *GLE_ODC_September Monthly Report 2025*, report prepared for Pembroke Olive Downs PTY Ltd by GreenLeaf Ecology.

Faunalink Ecological (2025), *Ecology Monitoring Report 2025: Olive Downs Stage 1 MNES Management Area*, report prepared for Pembroke Olive Downs PTY Ltd by Faunalink Ecological.

- (2026), *Greater Glider Nest Box Monitoring 2025*, report prepared for Pembroke Olive Downs PTY Ltd by Faunalink Ecological.



Appendix A

Preclearance ecology reports



Appendix B

Koala and glider monitoring reports



Appendix C

Glider nestbox monitoring



Appendix D

Post-clearance reporting



Appendix E

MNES monitoring including weed/pests



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Stage 1 Offset Area Management Plan– 2025 Annual Audit Report

Project	Olive Downs Coal Mine Site and Access Road
EPBC Permit	EPBC Act Referrals 2017/7867, 2017/7869, EPBC 2017/7868, 2017/7870
Plan Reference	2017/7867 - Conditions 2-10, Stage 1 Offset Area Management Plan 2017/7869 - Conditions 1-7, Stage 1 Offset Area Management Plan 2017/7868 - Conditions 1-7, Stage 1 Offset Area Management Plan 2017/7870 - Conditions 1-7, Stage 1 Offset Area Management Plan
Reporting Period	March 2025 – March 2026
Current Project Stage(s)	Stage 1 (entire reporting period) and Stage 2 (as of October 2025)
Relevant activity phases	Management, Monitoring and Ecosystem Health
Prepared by / date	Pembroke Olive Downs Pty Ltd, April 2026

Overview

Overall compliance statement:

The OD Stage 1 Offset Area Management Plan (v3) November 2020 (S1OAMPv3) was implemented in accordance with its requirements during the reporting period. The management measures were considered effective in avoiding, minimising and managing potential impacts to MNES, with minimal non-compliances identified and main objectives of S1OAMPv3 being met.

Total MP specified measures	61
Measures due during reporting period	Refer to Table 4.1 of S1OAMPv3. A total of 57 management or monitoring related activities were due during the current reporting period
Compliant measures	48 management / monitoring activities were completed, and 8 management / monitoring activities were in-progress during the reporting period, with an overall compliance rate of 98% .
Minor/major gaps identified	Active regeneration delayed, remains within 5-year window Washdown bay not installed, requirement under review Barbwire removal not complete; alternative approach with reflectors underway in relevant habitat areas
Overall corrective actions	This reporting period represents Year 4 of management under the S1OAMPv3, with a formal review scheduled at the end of Year 5. The S1OAMPV3 identifies active

Attachment C

Stage 1 OAMP Year 4 Annual Report



revegetation along riparian corridors to improve habitat connectivity as a key action, to commence from Year 3 and be completed by the end of Year 6. While active revegetation has not yet commenced, planning has progressed, including identification of priority areas and installation of monitoring points. Planning has progressed and ecological advice is being sought to ensure future revegetation actions deliver measurable improvements in habitat connectivity and quality.

Some fencing within the offset area continues to contain barbed wire top strands beyond the required timeframe. While fencing remains functional and no fauna injuries were recorded, this represents a timeframe-based non-compliance. Progressive replacement of barbed wire with fauna-friendly alternatives has been identified as a corrective action and will be prioritised in the next reporting period, with works systematically focused on fencing within and adjacent to Greater Glider habitat where the risk of entanglement to arboreal fauna is considered highest.

Biosecurity controls were identified as an area for improvement, with no dedicated wash-down facility currently in place. Although access is infrequent and interim controls are being applied, actions have been identified to establish a compliant wash-down arrangement or alternative biosecurity control program including routine field inspections in line with the Pathogen Management requirements of the S1OAMPV3.

Grazing was used in surrounding paddocks of the offset to manage biomass; however, it was not undertaken within the Stage 1 offset areas within the reporting period. Although technically not a non-compliance because other fuel load reduction measures were conducted and no adverse impacts to biodiversity values were observed, corrective actions have been identified to formalise crash grazing procedures, complete monitoring, and strengthen documentation and accountability to be able to incorporate this management measure effectively in future years.

Summary of Annual MNES MP Review

1.1. Key achievements:

- Installation of approximately 20 km of strategic grazing fencelines on areas adjacent to stage 1 offset areas to enable the appropriate grazing and fuel load reduction on areas within the offset property.
 - Successful completion of the first prescribed burning campaign within the stage 1 offset area to reduce biomass and to mitigate against the effects of uncontrolled bushfires.
 - Preparation works including mechanical weed control and installation of monitoring locations for upcoming revegetation works.

1.2. Key matters:

- Active regeneration campaign planning is currently underway however the program was proposed to commence in year 3. With the delay in commencement of this program, the activities will be consolidated into the current period until the end of year 6 (March 2028) to be compliant with the active revegetation condition.
- A dedicated washdown facility has not progressed due to logistics and the potential for increased onsite introduction of weeds and pathogens. Management practices have shifted to increased vigilance on access



requirements and ensuring appropriate biosecurity measures are used by employees and contractors accessing the offset areas.

1.3. Adaptive responses:

- The introduction of digital capture of chemical weed application has allowed for more consistent records to be kept for weed control campaigns.
- Introduction of the concurrent use of thermal drone alongside conventional spotlighting to detect Greater Gliders, Koala and other arboreal mammals for targeted species monitoring for enhanced detection.

2. Scope and reporting basis

This report summarises implementation and effectiveness of S1OAMPv3 for the reporting period. The methodology applied supports the annual reporting requirements. Documentation reviewed includes monitoring results, milestones and corrective actions.

This is a public version of the reporting submitted to the Department of Climate Change, Energy, Environment & Water. Publication of this report forms part of the Project's main EPBC Permit 2017/7867's Annual Compliance Report (ACR) publication process. This approach has shifted from separate publication events to ensure simplicity, transparency and consistency in Pembroke's reporting processes.



3. Progress and Implementation

MNES outcomes by value	Measure ID/ Criteria No.	Findings	Status	Applicability for period	Evidence summary	Commentary
Improve existing habitat in remnant woodlands.	1	In progress	Implemented (ongoing)	Applicable	Mechanical weed control evidence Revegetation progress workbook	Natural regeneration of woodlands was managed with mechanical weed control measures removing large thickets of Lantana. This measure will be followed by chemical weed control in 2026.
Expand habitat in regrowth woodlands and cleared agricultural grasslands (restoration areas).	2	In progress	Implemented (ongoing)	Applicable	Revegetation progress workbook	Planning for regeneration works occurred with the installation of monitoring points in planned regeneration areas and discussions with nurseries for seed collection activities and tube stock supply.
Active revegetation (seeding/planting) in identified revegetation areas.	3	In progress	Implemented (ongoing)	Applicable	Revegetation progress workbook	Targeted weed management to support regeneration program occurred.
Manage natural regeneration of woodlands in restoration areas	4	In progress	Implemented (ongoing)	Applicable	Mechanical weed control evidence Revegetation progress workbook	Natural regeneration of woodlands in restoration areas was managed with mechanical weed control measures removing large thickets of Lantana. This measure will be followed by chemical weed control in 2026.
Baseline weed mapping surveys.	5	Compliant	Implemented (ongoing)	Not Applicable	Baseline weed survey	Baseline weed survey report completed October 2023
Weeds will be managed in accordance with the project's weed management action plan. The weed action plan is to be developed post baseline	6	Compliant	Implemented (ongoing)	Applicable	Weed management action plan	Completed as previously reported.



MNES outcomes by value	Measure ID/ Criteria No.	Findings	Status	Applicability for period	Evidence summary	Commentary
surveys being completed in Year 1. The weed action plan will be prepared by Pembroke and a suitably qualified contractor identifying specific weed control methods, areas to be targeted and timing for each year.						
Targeted weed control measures	7	Compliant	Implemented (ongoing)	Applicable	Mechanical and chemical control logs and evidence	Recommendations in the weed management plan followed. 2 x Chemical weed control events completed in March (5 days) and August 2025 (4 days), 1 x Mechanical weed control November 25 (5 days).
Minimise fuel loads through crash grazing, slashing and/or hazard reduction burns and cool burns.	8	In progress	Implemented (ongoing)	Applicable	Survey 123 fuel load data and weed survey reporting, Mechanical weed control evidence, prescribed burning reporting, Fencing installation Scope of Work (SoW).	Quadrant fuel load monitoring conducted in July 2025 by Fauna link, conducted again in October/November 2025. Fuel load reduction has occurred across the site with Lantana mulching in some riparian areas, strategic grazing and mosaic burning in 2025. Strategic grazing fencing and infrastructure was installed throughout 2025 to be able to utilise areas of land in-between and adjacent to the offset areas for grazing for biomass control.
Exclude grazing in certain areas. Grazing is excluded from major watercourses and adjacent riparian areas (at least 50 m either side of any major water source) will be fenced off. Off-stream watering points will be installed to ensure cattle have adequate access to water.	9	Compliant	Implemented (ongoing)	Applicable	N/A	Grazing excluded from riparian areas of the stage 1 offset area.



MNES outcomes by value	Measure ID/ Criteria No.	Findings	Status	Applicability for period	Evidence summary	Commentary
During set times of year (wet season) or following significant rainfall (>50 mm in 7 days), grazing will be excluded in gilgai areas to ensure gilgai habitats are protected.	10	Compliant	Implemented (ongoing)	Applicable	N/A	Grazing excluded from gilgai areas during wet season or following significant rainfall.
Educate employees and contractors on general fire awareness and response procedures.	11	Compliant	Implemented (ongoing)	Applicable	Site familiarisation with contractors and visitors	Forms part of site induction. Employees and contractors visiting the Stage 1 Offset Area receive fire response education as a part of site induction procedures.
Create and maintain fire tracks (fire breaks) for fire control.	12	Compliant	Implemented (ongoing)	Applicable	Civil works evidence, Prescribed burning reporting.	Firebreak and Fireline maintenance in April/May 2025 with approximately 115km of graded firebreaks and tracks and 80 km of slashed lines.
Reduce fuel load (see biomass control above)	13	Compliant	Implemented (ongoing)	Applicable	Prescribed burning May 2025	Prescribed burning undertaken by Fireline consultancy occurred in May 2025 creating a mosaic burn of approximately 30% coverage across 445ha within stage 1 offset.
Hazard reduction burns/ Mosaic burning.	14	Compliant	Implemented (ongoing)	Applicable	Prescribed burning May 2026	Prescribed burning undertaken by Fireline consultancy occurred in May 2025 creating a mosaic burn of approximately 30% coverage across 445ha within stage 1 offset.
Baseline feral animal surveys in Year 1.	15	Compliant	Implemented (ongoing)	Not Applicable	Baseline feral animal survey	Baseline feral animal survey report completed in September 2023.
Species specific management controls. Pest fauna to be targeted include; feral pigs, foxes, rabbits, wild dogs, feral cats and cane toads.	16	Compliant	Implemented (ongoing)	Applicable	Pest fauna control reports	Cane toad tadpole trapping was successfully conducted in June, August, October, December 2025 and February 2026. FVR conducted four pest fauna control sessions in March, June, October 2025 and Feb 2026.



MNES outcomes by value	Measure ID/ Criteria No.	Findings	Status	Applicability for period	Evidence summary	Commentary
Fencing to be maintained to allow grazing to be managed.	17	Compliant	Implemented (ongoing)	Applicable	Regular inspections of fencelines conducted by land manager	Fencing throughout the stage 1 offset properties and surrounds are maintained by contractors and the land manager when required.
Fences with barbed wire to be replaced with top strands with no barbed wire.	18	In progress	Implemented (ongoing)	Applicable	Spatial files of fencing removal and retrofitting works	Removal of fences and retrofitting of top strands commenced in Year 3 and is continuing with all fences in proximity to greater glider records and MNES habitat mapping prioritised. 13.7 km of fenceline retrofitted, and 25.7 km of fences completely removed. Approximately 28km of boundary fencelines were fitted with reflective disks to help with visibility for wildlife at approximately 5 m intervals.
Annual maintenance of access tracks will be undertaken, including grading and erosion control measures, using graders and road base materials where required. Access tracks will be no wider than 3 metres in width.	19	Compliant	Implemented (ongoing)	Applicable	Civil works evidence	Track maintenance was undertaken at the same time as firebreaks were graded in May 2025. All tracks were maintained to their original widths.
Washdown bays at the entrances of the Stage 1 offset area will be provided to limit the risk of pathogens spreading onto site. Washdowns of vehicles and machinery will be required each time the site is visited.	20	Non-Compliant	Implemented (ongoing)	Applicable	Vehicle washdown records, Photographic evidence of signage and security.	Contractors and visitors to the offset area are required to washdown vehicles before entering and each time the site is visited and to remain on designated tracks. Washdown facilities are available close by on the mine site. Biosecurity signage at main entrance and access is restricted through signage or security locks at main accesses. The requirement for a washdown facility within the Offset area is under review.



MNES outcomes by value	Measure ID/ Criteria No.	Findings	Status	Applicability for period	Evidence summary	Commentary
If any areas are reasonably suspected to be infected with this pathogen in future (for example, areas of unexplained vegetation death) a targeted sampling, diagnosis and management strategy will be designed to address impacts and further spread.	21	N/A	Implemented (ongoing)	Applicable	N/A	The S10QAMP outlines that Phytophthora cinnamomi and Myrtle rust (Austropuccinia psidii) which are classified as Key Threatening Processes (KTP) under the EPBC Act. Neither Pathogen was detected during the period.
Erosion will be further limited through fencing stock out, revegetating waterways, and managing pigs. Where those controls are not adequate to maintain or improve erosion, appropriate erosion-control measures will be implemented, such as sandbags.	22	Compliant	Implemented (ongoing)	Applicable	Feral animal control reports, strategic fencing works scope	Addressed under broader management actions - Feral animal control, revegetation requirements and track maintenance.
The prohibited activities referred to in the S10AMPv3 are not permitted to occur, unless express written permission is received from Pembroke and DAWE.	23	Compliant	Implemented	Applicable	N/A	No prohibited activities occurred within the offset areas during this period.
All set management actions required in each 12-month period will be evaluated to confirm they have been completed.	24	Compliant	Implemented	Applicable	Audit workbook	An audit of required management actions was prepared for Year 4.
A suitably qualified person will be engaged by Pembroke Resources to	25	Compliant	Implemented	Applicable	Audit workbook	Pembroke Snr Environmental Advisor conducted inspections of Stage 1 Offset area to confirm work has been completed



MNES outcomes by value	Measure ID/ Criteria No.	Findings	Status	Applicability for period	Evidence summary	Commentary
inspect the offset area and confirm work has been completed.						
Audit will occur on an annual basis.	26	Compliant	Implemented	Applicable	Audit workbook	An audit of required management actions was prepared for Year 4 in April 2026
After each monitoring event, the results will be evaluated and measured against the specific management outcomes for that particular matter.	27	Compliant	Implemented	Applicable	Respective reporting of monitoring events	Addressed in each report prepared regarding Year 4 actions. Summarised in the annual report document.
Pembroke will undertake a review of the monitoring program. The review will consider: • Are the monitoring methods effective and providing the information required? • Are the monitoring frequencies suitable? • Is the monitoring program efficient or are there improvements that could be made? • What changes may be justified and why?	28	Compliant	Implemented	Applicable	Respective reporting of monitoring events	Full review required after five years of management actions Corrective actions identified throughout monitoring implemented. Cane toad tadpole trapping noted as ineffective and recommendations made to begin process so this can cease.
Annual report preparation	29	Compliant	Implemented	Applicable	S1OAMPv3 – 2025 Annual Audit Report, EMS	Annual compliance reporting document template to be completed and included with the respective EPBC annual compliance submission.



MNES outcomes by value	Measure ID/ Criteria No.	Findings	Status	Applicability for period	Evidence summary	Commentary
Weed monitoring survey conducted on an annual basis (including permanent weed monitoring transects and photo monitoring points at large infestations)	30	Compliant	Implemented	Applicable	Weed monitoring report	Weed monitoring conducted by Faunalink in July 2025
Pest fauna survey required on an annual basis until Year 5 including camera trapping and spotlighting	31	Compliant	Implemented	Applicable	Year 4 Pest animal survey report	Pest monitoring was conducted by Faunalink in July 2025
Species specific management controls to be implemented following yearly monitoring surveys (when required).	32	Compliant	Implemented	Applicable	Pest fauna control reports	FVR conducted four pest fauna control sessions in March, June, October 2025 and Feb 2026.
Cane toad tadpole trapping to be conducted on a quarterly basis until Year 5.	33	Compliant	Implemented	Applicable	Cane toad tadpole trapping report	Cane toad tadpole trapping conducted 5 times throughout the period.
Fire track maintenance required annually.	34	Compliant	Implemented	Applicable	Civil works evidence	Fire track maintenance conducted in Year 4.
Survey fire tracks annually	35	Compliant	Implemented	Applicable	Annual inspection	Annual inspections of fire tracks post wet season - March 2026
Fuel load assessment required quarterly.	36	In progress	Partially Implemented	Applicable	Survey 123 fuel load data	Fuel load assessments conducted in Year 4.
Fuel load reduction (see Fire management, above) employed when required	37	Compliant	Implemented	Applicable	Prescribed burn report	Controlled burn conducted in May 2025.
Monitor fuel loads via biomass method using quadrats and assessing groundcover and grass height. This is to	38	In progress	Implemented	Applicable	Survey 123 fuel load data and weed survey reporting, Strategic grazing fencing SOW	See Fencing section above for summary of fencing actions. No survey of grazed areas conducted in Year 4 (cattle excluded from offset area).



MNES outcomes by value	Measure ID/ Criteria No.	Findings	Status	Applicability for period	Evidence summary	Commentary
be completed by the grazing manager quarterly (in absence of grazing) and weekly (when cattle are allowed to graze).						No quarterly checklist completed in Year 4. Quadrat sampling completed in 2025, the results from the 2025 fuel load monitoring completed concurrently with the weeds survey were included in the Stage 1 Weed Monitoring Report 2025.
Survey fences and confirm adequate maintenance, and that cattle are excluded from sensitive MNES habitats (e.g. watercourses, gilgai).	39	Compliant	Implemented	Applicable	Spatial files - Fencelines	Fenceline and paddock inspections conducted by Pembroke Environmental personnel and Land Manager to ensure integrity of fencelines surrounding sensitive MNES habitats.
Assess grazed areas for effectiveness in managing fuel load and that no degradation to environmental values is occurring.	40	N/A	N/A	Applicable	N/A	No fuel load reduction grazing currently occurring in Stage 1 Offset areas
Quadrat sampling method should occur monthly to determine trigger levels, and then once a week when grazing is occurring.	41	In progress	Implemented	Applicable	Survey 123 data	Quadrant fuel load monitoring conducted in July 2025 by Fauna link, conducted again in October/November 2025. Monthly and weekly fuel load sampling has not been occurring due to the absence of fuel load reduction grazing.
Quarterly checklist to be filled out by grazing manager that will include: – Weather conditions – Grazing intensity and stock rotation – Fuel load levels at commencement of grazing and completion of grazing and duration (including photos) – Report on general property	42	N/A	N/A	Applicable	N/A	Quarterly checklist not completed by Land Manager due to the absence of fuel load reduction grazing in Stage 1 Offset areas.



MNES outcomes by value	Measure ID/ Criteria No.	Findings	Status	Applicability for period	Evidence summary	Commentary
maintenance activities such as fencing, access track maintenance etc.						
Baseline Bio Condition transects will be established in Year 1 across the offset areas.	43	Compliant	Implemented	Applicable	N/A	Baseline Habitat Quality Report completed in October 2023
In Year 3 Bio Condition transects will be re-assessed and habitat quality scores prepared for each MNES species.	44	N/A	Not Implemented	Not Applicable	N/A	No Habitat Quality monitoring was required in year 4.
Weed invasion / occurrence in ornamental snake habitat assessed as part of weed survey.	45	Compliant	Implemented	Applicable	Weed monitoring report	Weed monitoring conducted by Faunalink in July 2025
Condition of gilgai to be monitored for degradation from cattle, feral pigs or deer.	46	Compliant	Implemented	Applicable	Year 4 Pest animal survey report	Pest monitoring was conducted by Faunalink in July 2025
Permanent spotlighting transects will be established across the MNES habitat area. These will be surveyed at each survey period to support an estimate of population numbers, and how these are changing over time.	47	Compliant	Implemented	Applicable	Stage 1 Offset year 4 Ecological monitoring report	Ornamental Snake targeted survey completed in late April, early May 2026 due to the prolonged wet conditions of the Offset areas.
Locations of ornamental snake sightings recorded to assess habitat utilisation and dispersal.	48	Compliant	Implemented	Applicable	Stage 1 Offset year 4 Ecological monitoring report	Targeted survey completed in late April, early May 2026 due to the prolonged wet conditions of the Offset areas.



MNES outcomes by value	Measure ID/ Criteria No.	Findings	Status	Applicability for period	Evidence summary	Commentary
Weed invasion / occurrence in koala habitat assessed as part of weed survey.	49	Compliant	Implemented	Applicable	Weed monitoring report	Weed monitoring conducted by Faunalink in July 2025
Complete koala surveys to determine the presence of the species within the offset area (various methods).	50	Compliant	Implemented	Applicable	Stage 1 Offset year 4 Ecological monitoring report	Targeted survey completed in November 2025.
Location of koala sightings recorded to assess habitat utilisation and dispersal.	51	Compliant	Implemented	Applicable	Stage 1 Offset year 4 Ecological monitoring report	Targeted survey completed in November 2025.
Weed invasion / occurrence in squatter pigeon habitat assessed as part of weed survey.	52	Compliant	Implemented	Applicable	Weed monitoring report	Weed monitoring conducted by Faunalink in July 2025
Complete squatter pigeon surveys to determine the presence of the species within the offset area (various methods).	53	Compliant	Implemented	Applicable	Stage 1 Offset year 4 Ecological monitoring report	Targeted survey completed in November 2025.
Location of squatter pigeon sightings recorded to assess habitat utilisation and dispersal.	54	Compliant	Implemented	Applicable	Stage 1 Offset year 4 Ecological monitoring report	Targeted survey completed in November 2025.
Weed invasion / occurrence in Australian painted snipe habitat assessed as part of weed survey.	55	Compliant	Implemented	Applicable	Weed monitoring report	Weed monitoring conducted by Faunalink in July 2025
Complete Australian painted snipe surveys to determine the presence of the species within the offset area (various methods).	56	Compliant	Implemented	Applicable	Stage 1 Offset year 4 Ecological monitoring report	Targeted survey completed in late April, early May 2026 due to the prolonged wet conditions of the Offset areas.



MNES outcomes by value	Measure ID/ Criteria No.	Findings	Status	Applicability for period	Evidence summary	Commentary
Location of Australian painted snipe sightings recorded to assess habitat utilisation and dispersal.	57	Compliant	Implemented	Applicable	Stage 1 Offset year 4 Ecological monitoring report	Targeted survey completed in late April, early May 2026 due to the prolonged wet conditions of the Offset areas.
Weed invasion / occurrence in greater glider habitat assessed as part of weed survey.	58	Compliant	Implemented	Applicable	Weed monitoring report	Weed monitoring conducted by Faunalink in July 2025
Complete greater glider surveys to determine the presence of the species within the offset area (various methods).	59	Compliant	Implemented	Applicable	Stage 1 Offset year 4 Ecological monitoring report	Targeted survey completed in November 2025.
Location of greater glider sightings recorded to assess habitat utilisation and dispersal.	60	Compliant	Implemented	Applicable	Stage 1 Offset year 4 Ecological monitoring report	Targeted survey completed in November 2025.
Nest box installation and occupation monitoring. Cameras to be used to determine if Greater Gliders are using nest boxes, or if other species are competing for nest boxes.	61	Compliant	Implemented	Applicable	R5 Nest Box monitoring report	A total of 56 nest boxes were installed in 2023. Round 5 monitoring was undertaken in June 2025. Monitoring results confirmed that 15 nest boxes (26.8%) were actively occupied by Greater Gliders at the time of survey, supporting a total of 20 individuals. Five of the occupied nest boxes contained two individuals, while the remaining ten boxes contained a single individual.



4. Non-compliance, incidents and corrective actions

Issue/Non conformance	Related measure ID / MNES value	Corrective action	Status	Commentary
All fences with top barbed wire to be replaced within first 6 months of Year 1 was not completed.	Criterion 18, Fencing	Continue with the removal of top strands of barbed wire throughout the remainder of the stage 1 offset property.	Ongoing	Sections of fencing within the biodiversity offset property retain barbed wire top strands beyond the required timeframe, constituting a timeframe-based non-compliance. While fencing remains stock-proof and no fauna injury or mortality was recorded during the reporting period. A review and risk assessment process commenced during the period to inform necessary updates to this management plan.
Washdown bay at the entrances of the Stage 1 offset area has not been provided to limit the risk of pathogens spreading onto site.	Criterion 20, Pathogen management	Requirement for installation of washdown bay is under review.	Ongoing	Access to the offset area is limited. Controls are in place to restrict vehicle access and promote biosecurity awareness. Due to the limited services or alternatives in close proximity to the Stage 1 Offset area, this requirement is currently under review.



5. Adaptive management and improvements

Lesson / Trigger	Change made or proposed	Reason / Expected benefit
Pest animal surveys completed in 2025 identified an increase in feral pig activity within stage 1 Offset area	Targeted feral pig management will be prioritised in affected areas suggested by feral animal control contractor, with control measures to be implemented in accordance with biosecurity and animal welfare requirements. Monitoring of feral animal activity will continue to inform management effectiveness.	Reduces pressure on MNES habitat and ground layer vegetation, limits soil disturbance and degradation, and supports the ongoing condition and ecological function of retained MNES habitat.
Opportunity to improve record-keeping by incorporating biosecurity checks into routine field inspection forms.	Establishment of clear access protocols for the offset property, including: Defined approved access points only, vehicle access limited to essential activities only and visual inspection of vehicles prior to entry during wet conditions.	To reduce the risk of introducing or spreading soil-borne pathogens (e.g. Phytophthora spp.) within the biodiversity offset area by strengthening access controls, hygiene practices, and monitoring. Improved biosecurity measures will better protect vegetation communities and biodiversity values, increase alignment with the intent of the Management Plan, and reduce future compliance risk.
The non-completion of monthly quadrat fuel load monitoring during the reporting period highlighted that monitoring responsibilities and scheduling were not sufficiently formalised. Reliance on ad-hoc or informal arrangements increased the risk of monitoring requirements being overlooked during periods of competing operational priorities.	Plan monthly quadrat fuel load monitoring with clearly assigned responsibility and calendar scheduling.	Clearly assigning responsibility and implementing calendar-based scheduling for monthly quadrat fuel load monitoring (access permitting) is expected to ensure monitoring is undertaken at the required frequency and in accordance with the S1OAMPV3. This will improve the consistency and reliability of fuel load data, support timely identification of trigger levels, and enable proactive fuel and fire risk management, thereby enhancing protection of biodiversity values and reducing future compliance risk.
Implementation of effective crash grazing to reduce biomass with appropriate monitoring and reporting completed by grazing manager has not been conducted during the reporting period.	Implement crash grazing and associated monitoring and reporting for biomass control	Grazing was undertaken within the surrounding pastoral property; however, crash grazing was not implemented or documented in accordance with the S1OAMPV3 within the confines of the stage 1 Offset property. Although technically not a non-compliance due to other means of fuel reduction being utilised (prescribed burning) and no adverse impacts to biodiversity values were observed, a corrective action has been identified to formalise the grazing checklist, complete quadrat sampling at required frequencies, and complete annual inspections and effectiveness assessments in line with the S1OAMPV3 for crash grazing to commence in 2026., post wet season.



6. Declaration

I declare that this annual report accurately reflects implementation of S1OAMPv3 for the stated reporting period and is supported by the underlying audit workbook and project records.

Prepared by	Kerryn Nicholas, Senior Environmental Advisor
Reviewed & approved by	Ngairé Tranter, Head of Approvals & Environment
Date of release	30 June 2026



END OF DOCUMENT

Attachment D

Koala and Greater Glider Conservation Program

Olive Downs Complex Koala & Greater Glider Program Framework

05 June 2025
PBODC-ODC-CNS-001



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Not applicable

Document History

Revision	Date	Status	Purpose	Author
1	May 2024	Draft	Draft for approval	
2	12 Feb 2025	Update	Updates based upon DCCEEW and external party feedback	
3	07 April 2025	Final	Document finalisation	
4	05 June 2025	Update	Based upon DCCEEW change to variation condition 36 (a)	

1. Introduction

This document provides the framework of the financial contributions that will be delivered by Pembroke Olive Downs Pty Ltd (Pembroke) to support environmental conservation in the Bowen Basin. As per the conditions of the approval for the Olive Downs Mine Site an Access Road (EPBC2017/7867) (the Approval) under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), Pembroke is required to contribute funds to deliver conservation outcomes of koala and greater glider in the Bowen Basin through the delivery of a conservation program.

This document is set out as follows:

- Section 2: Description of the Koala & Greater Glider Conservation Program (the Program), designed to support the Program outlined in Section 3.
- Section 3: Koala & Greater Glider Conservation Program (the Program), as applicable to the conditions of approval EPBC 2017/7867.

2. Koala & Greater Glider Conservation Program

Pembroke as the approval holder will engage an independent organisation to establish the Program to meet its obligations under the Approval.

Pembroke will make contributions to the Program. A Steering Committee will be established to manage the distribution of the Program in line with the objectives of the Conservation Program. This section outlines the mechanism proposed to manage and administer the Program.

The initial objective of the Program is to implement the activities required through the Conservation Program in accordance with conditions of the Approval.

Once established the Steering Committee will determine the suitability of broadening the participation and funding opportunities by Third-Parties with EPBC Approvals. This determination would be made within year 1 of the establishment of the Program and will be at the independent delivery party's discretion.

2.1 Administration of the Program

Administration of the funds will occur via standard commercial practices of invoices provided by the delivering party to Pembroke which detail the Steering Committee agreed and DCCEEW approved activities.

In keeping with recognised and accepted accounting practices the allocation of funds for the Program will be auditable and traceable within Pembroke's financial reporting processes.

This process will be guided by the commercial agreement between the parties for delivery of this program. The finalised agreement between the parties will be provided to DCCEEW for the Department's internal review and confidential record keeping.

2.2 Steering Committee

The initial year 1 steering Steering Committee will constitute two representatives of Pembroke and two representatives of the independent party engaged to undertake the Conservation Program.

The Parties to the Steering Committee will be organisational based and will retain independent agency for their respective organisational activities and will deliver this program in good faith and with a collaborative regional focus upon the listed conservation outcomes of this Program. This document serves as the project charter and guidance documentation for the program with guidance and adaptation measures to be incorporated with the annual review and reporting mechanisms that stipulate DCCEEW engagement and/or approval.

The Steering Committee will determine the focus of the Conservation Program and the assignment of suitably qualified persons to undertake the activities under the Conservation Program. Where determined as required by the Steering Committee external advice will be sought from a suitably qualified ecologist regarding the delivery of proposed actions.

In keeping with the intent of this program, the Steering Committee will at a minimum meet biannually, via Teams, to determine annual delivery programs and review progress.

2.3 Delivery of the Conservation Program

The objectives that will be considered by the Program are as follows:

- Contribute \$100,000 (GST exclusive and indexed in line with CPI for each year to be equal to the value of \$100,000 on the date of commencement of Stage 2)1 each year for 10 years to a program where the total contribution will be used for the better protection and long-term conservation of EPBC Act listed koala (*Phascolarctos cinereus*) (endangered) and greater glider (*Petauroides volans*) (endangered) in the Bowen Basin from the commencement of Stage 2 of the Project (as defined by the Approval)
- Engage suitably qualified person/s to scope and develop activities that will be funded by the Conservation Program. These activities will be endorsed by Pembroke prior to providing to DCCEEW for approval.
- Revegetate and rehabilitate habitat in the riparian zones associated with watercourses to create and maintain koala and greater glider habitat connectivity.

Additional activities to be considered by the Steering Committee include:

- implementation of actions that will support a greater understanding of the species dispersal across different habitat types, including in response to vegetation clearing which may include the tracking of koalas and greater glider
- surveys to contribute towards understanding koala and greater glider population density and carrying capacity across the Bowen Basin
- implementation of priorities identified in relevant recovery plans, threat abatement plans and/or approved conservation advices, and evaluate their success and cost effectiveness.

2.4 Publication

Pembroke reserve the right to publicise and report on the provision of funding. The recipient of the Program must obtain the Proponent's agreement before releasing any announcements, or conducting any publicity events for the Program.

The approved plan (this document) will be published to Pembroke's website, as the approval holder, in accordance with Condition 70 of the approval.

Outcomes of the Program's implementation is to be made publicly available (in accordance with the Approval). At a minimum, the peer-review of the outcomes of the Activities are to be published on the Approval holder's website. Reviews can also be published in a relevant scientific journal.

2.5 Reporting

Annual reporting will be provided by the Approval holder to the Commonwealth Department of Environment to document the progress of Activities, notable results of baseline and monitoring surveys and the status of the Program.

In accordance with Approval condition 16 (a) a report will be prepared at the completion of each Activity to document the methods, results, conclusions and relevant management recommendations. The report will be published on the Approval holder's website.

In accordance with conditions 33, 34 and 36 of the Approval, financial contributions will be reported in addition to the technical activity reporting.

In accordance with condition 40 of the Approval the first financial review must commence upon the year five anniversary of first funds contribution. The report must be submitted to DCCEEW within 6 commences of commencement, being 5 years and six months from first funds contribution. Further information regarding reporting commitments, relevant approval conditions and timing is provided with Table 6. This review must capture any other financial contributions made by third parties including other EPBC approval holders to fund the Program.

Further details of the reporting requirements associated with this program are provided in section 4.4 of this document.

3. Koala & Greater Glider Conservation Program

3.1 Background and Objectives

The Koala & Greater Glider Conservation Program aims to implement conservation outcomes and benefits in the region by providing an opportunity for industry to lead the implementation of research and studies and on-ground activities. The Program is established to align with conditions of Approval (EPBC 2017/7867) for the Olive Downs Mine and Access Road. The Program is funded by contributions made by the Approval holder.

The objective of the Program is to deliver activities that provide conservation gains to the conservation of the Greater Glider and Koala within the Bowen Basin.

The design of the activities will consider the current threats and conservation advice listings for targeted species to ensure that the Program achieves outcomes that align with DCCEE policy. The outcomes of the activities will be documented and published to inform what is best practice for conservation.

For clarity in the context of Pembroke's broader approvals, the activities of this program are designed to be separate and additional to Pembroke's prior Stage 1 and emerging Stage 2 research obligations.

The objectives must also specifically link back to address the conditions of the Approval (EPBC 2017/7867 – conditions 32 to 40), as related to the Approval holder making financial contributions to a program managed by an independent entity that implements activities to achieve conservation of the koala and greater glider. Through the Program, the Approval holder must comply with the conditions of Approval.

The objectives of the Program and the mechanism to implement the activities to meet these objectives is outlined in **Section 4.3** and has been scoped to allow the Approval holder to meet the conditions of the Approval which drive for conservation gains in the Bowen Basin.

3.2 Limitations

A number of limitations may be realised during the implementation of the Conservation Program and should be considered when scoping the activities in the early stages:

- Funds available may limit the scope of the activities. When preparing the activity plans, costs of implementation must consider the funds available. It is recommended that consultation and engagement with third parties is undertaken to seek additional buy-in or identify opportunities to target efforts, noting that third-parties may not necessarily be contributing members to the Program..
- The Steering Committee will be responsible for ensuring an independent peer review is conducted by an appropriate subject matter expert. If there are challenges to engage roles to meet the definitions in the Approval, the Approval holder will engage with the DCCEE to ensure the fund management is compliant with the condition of Approval.

3.3 Scope of Program

The initial scope of the Program is primarily to achieve compliance with the conditions of Approval (EPBC 2017/7867) with a specific focus upon supporting conservation activities targeting koala and greater glider populations. To demonstrate that the Approval conditions can be met through the Program, clear references are made to condition requirements.

To inform the scope of the Program, a list of definitions and roles and responsibilities have been detailed in Table 1 and Table 2.

TABLE 1 DEFINITIONS

TERM	DEFINITION
Activity Plan	An activity plan will be prepared by an independent suitably qualified expert and detail the scope, objective and implementation of each activity. Benchmarks for outcomes will be established to inform reporting and peer-review.
Approval	EPBC 2017/7867 Olive Downs Mine Site and Access Road. The Conservation Program is to be prepared and implemented in accordance with the conditions of Approval to ensure compliance.
Conservation Program	The Koala & Greater Glider Conservation Program will be managed by the Steering Committee. The Conservation Program is to achieve conservation benefits in the Bowen Basin and consider the requirements of the conditions of the Approval.
the Program	The Koala & Greater Glider Conservation Program. The Program financial distributions are managed by the Steering Committee and will form part of the Company's audited financial reporting

A number of roles are identified as participants to the successfully delivery of the Program, including those that are defined in the Approval.

TABLE 2 ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY
Approval holder	- Pembroke Olive Downs Pty Ltd. - Contributor to the Conservation Program in accordance with EPBC Act conditions of approval. - Responsible for compliance against conditions of the Approval (EPBC 2017/7876) and submission of documents to comply with conditions.
The Department	- Department means the Australian Government agency responsible for administering the EPBC Act. - the relevant Department issuing the Approval, managing compliance with conditions and to receive reporting regarding the outcomes of the Program.
Independent suitably qualified expert (as defined in EPBC 2017/7876)	- that does not have individually, or by employment or family affiliation, any conflicting or competing interests with the approval holder and/or suitably qualified ecologist; - with at least a postgraduate degree (or equivalent) in Greater Glider ecology and/or Koala ecology; and - with a minimum 10 years of relevant experience in Greater Glider ecology and/or Koala ecology research, including at least 1 year experience in Australia.
Peer-review (as defined in EPBC 2017/7876)	means reviewed by at least 1 recognised subject matter expert independent to the suitably qualified ecologist and independent suitably qualified expert.
Suitably qualified ecologist (as defined in EPBC 2017/7876)	means a person who has professional qualifications and at least 3 years of work experience designing and implementing surveys for the listed threatened species and community and their habitat, and can give an authoritative assessment and advice on the presence and habitat requirements of the listed threatened species and community using relevant protocols, standards, methods and/or literature.

Suitable qualified person (as defined in EPBC 2017/7876)	means a person who has professional qualifications, training, skills and/or experience related to the nominated subject matter and can give authoritative independent assessment, advice and analysis on performance relative to the subject matter using the relevant protocols, standards, methods and/or literature.
Steering Committee	- Responsible for directing the Funds. - Includes 2 representatives of the Approval holder and 2 representatives of the independent consultant - Oversees the implementation of the Conservation Program and Activities. - Manages conservation program and funding arrangement. - Undertakes the reviews of the outcomes at 5 years.

3.4 Program Schedule

The Program will be funded over a ten-year period, via the Program, during which activities will be established and implemented to meet the objectives. **Table 3** provides an overview of the proposed Program schedule over the ten years. Where relevant, timeframes specified in the Approval have been included to ensure compliance with specified timeframes.

TABLE 3 CONSERVATION PROGRAM SCHEDULE

YEAR	STAGE	ACTIONS
1	Establishment	The commencement of Year 1 will coincide with the commencement of Stage 2. The actions of Year 1 include: - Initial financial allocation made to the Program at the commencement of Stage 2. - Establishment of the Steering Committee. - Engagement of Independent Suitably Qualified Expert. - Consultation with government environmental agencies, local environmental groups and council to inform scope of Activities. - Determining scope of Activity Plans for the Conservation Program to be prepared by an Independent Suitably Qualified Expert.
2-5	Implementation	The actions between Years 2-5 include: - Continued annual contributions to the Program. - Prior to the commissioning of each activity, provide to the Department information prepared by a suitably qualified person in accordance with condition 37. - Implementation of Activity Plans. - If any Activity Plans are concluded during these Years, a peer-review of the outcomes is to be undertaken and provided to the Department and published online.
5	Review	Specifically at Year 5: A review of outcomes from the financial contributions must commence 5 years after the date of the first financial contribution or as otherwise agreed by the Minister in

		writing. This review must take into account progress of each activity and any subsequent on-ground actions. Commissioning a detailed report of the outcomes from the review must be provided to the Department 6 months of the commencement of the review.
6-10	Implementation	The actions between Years 6-10 include: - Continued contributions to the Program. - Prior to the commissioning of each activity, provide to the Department information prepared by an independent suitably qualified expert in accordance with condition 37. - Implementation of Activity Plans. - If any Activity Plans are concluded during these Years, a peer-review of the outcomes is to be undertaken and provided to the Department and published online. - Implement outcomes of the 5-yearly review.

4. Scope of Conservation Program

4.1 Koala

4.1.1 Habitat

The koala (*Phascolarctos cinereus*) occurs widespread across many bioregions in Queensland from the coast to the central state from far north as Einasleigh Uplands and Wet Tropics to South-East Queensland. Records of the species are found in Desert Uplands, Central Mackay Coast, Mitchell Grass Downs, Mulga Lands, Brigalow Belt North and Brigalow Belt South.

In Queensland, koala habitat consists of southern and central western subhumid woodlands, and a number of eucalypt woodlands adjacent to waterbodies. The density of records in the Brigalow Belt bioregion is high in comparison to other bioregions (based on data in 2016 (Adams-Hosking et al. 2016)).

Habitat critical to the survival of the species is defined (in accordance with the Approved Conservation Advice (DAWE, 2022a)) as typically characterised by Eucalyptus forests and woodlands providing resources sufficient for foraging, breeding, growth and movement such as food and shelter trees.

The Olive Downs Complex is located within the Brigalow Belt bioregion and Northern Bowen Basin subregion. In accordance with the definition of habitat critical to the survival of the species, the following State Regional Ecosystems (REs) were mapped in the Olive Downs Complex area:

- eucalypt open forests to woodlands on floodplains (i.e. REs 11.3.3, 11.3.4, 11.3.7 and 11.3.25);
- eucalypt dry woodlands on inland depositional plains (i.e. REs 11.3.2, 11.5.3, 11.5.8c, 11.5.9, 11.5.9b and 11.9.2);
- vegetation surrounding and within the lacustrine and palustrine wetlands (i.e. REs 11.3.27f, 11.3.27i, 11.3.3c and 11.5.17); and
- regrowth woodland or shrubland with known koala food trees or shrublands with emergent koala food trees.

4.1.2 Threats and Recovery

Koala individuals and populations are impacted by climatic and anthropogenic changes to their environment. These changes result in impacts to population size of the listed Koala and distribution through associated ecologically threatening processes of habitat loss, fragmentation and degradation, exacerbation of disease impacts, disruption of population processes, impediments to safe movement and loss of genetic diversity (DAWE, 2022b).

The Approved Conservation Advice (DAWE, 2022a) identifies several threats impacting koala populations, including:

- loss of climatically suitable habitat
- increased intensity/frequency of drought, heatwaves and bushfire
- declining nutritional value of foliage
- clearing and degradation of koala habitat
- encounter mortality with vehicles and dogs
- koala retrovirus and chlamydia.

Overarching strategies and recovery actions and provide scope and direction to manage and mitigate threats to koala to provide conservation outcomes for the species. Actions within the Approved Conservation Advice is supported by the National Recovery Plan for the Koala (DAWE, 2022b), released by the Australian Government following the uplisting of the species to endangered in February 2022.

Policy provides guidance to stakeholder group on how the described actions can be implemented participate in outcomes-focused recovery actions. The on-ground strategies are informed by targeted research initiatives and engagement with experts to determine the effective implementation practices. The overarching strategies are:

- Supporting strategies
 1. Build and share knowledge
 2. Engage and partner with community in listed koala conservation
 3. Increase the area of protected habitat for the listed koala
 4. Integrate listed koala conservation into policy, statutory and land use plans.
- On-ground strategies
 5. Strategically restore listed koala habitat
 6. Actively manage listed koala metapopulations.

Each strategy is supported by prioritised actions and descriptions of the objective and how each should be implemented.

For the purposes of the conservation program, these strategies and actions are to be considered in design and implementation of the action plans to improve conservation of the koala in the Bowen Basin in line with government policy.

4.2 Greater glider

4.2.1 Habitat

The distribution of greater glider (southern and central) (*Petauroides volans*) in Queensland ranges from near Proserpine south into New South Wales. The species is an arboreal nocturnal marsupial, largely restricted to eucalypt forests and woodlands. Habitat depends on the resources available such as large, continuous patches of eucalypt forest, hollow-bearing trees and cool microclimatic forest/woodland areas. Distinction is made between denning and foraging habitat.

Within the Olive Downs Complex, greater glider habitat includes remnant and regrowth forest or woodland which contain suitable hollow bearing trees. This includes:

- all areas of eucalypt open forests to woodlands on floodplains (i.e. REs 11.3.3, 11.3.4, 11.3.7 and 11.3.25);
- eucalypt dry woodlands on inland depositional plains (i.e. REs 11.3.2, 11.5.3, 11.5.8c, 11.5.9, 11.5.9b and 11.9.2);
- vegetation surrounding and within the lacustrine and palustrine wetlands (i.e. REs 11.3.27f, 11.3.27i, 11.3.3c and 11.5.17);
- acacia woodland dominated / co-dominated by *E. cambageana* (i.e. RE 11.4.8); and
- patches of regrowth eucalypt forest or woodland with suitable hollow-bearing trees (primarily stags) (DPM Envirosciences 2019).

4.2.2 Threats and Recovery

Greater gliders were uplisted to endangered in 2022 due to continuing impact on the population of the species driven by key threats such as an increase in frequency and intensity of bushfires, inappropriate prescribed burning, climate change, land clearing and timber harvesting (DCCEEW, 2022).

The Approved Conservation Advice for greater glider identifies the following threats impacting on the species:

- Inappropriate fire regimes
- Habitat clearing and fragmentation
- Timber harvesting
- Barbed wire fencing (entanglement)
- Increased temperatures and changes to rainfall patterns
- Hyper-predation by owls
- Competition from *Cacatua galerita* (Sulphur-crested cockatoos)

Predation by feral cats and European red foxes.

Conservation and recovery actions are aimed at protecting habitat from natural hazards and changes in land use, particularly hollow-bearing trees and food trees and reduce impacts from habitat disturbance and modification. Many of the actions prioritise avoidance of habitat disturbance and ensuring that the identified threats have been appropriately considered and managed. A summary of the conservation and management priorities (relevant to the scope of this program) include:

Habitat loss, disturbance and modification:

- Protect and maintain sufficient areas of suitable habitat, including denning and foraging resources and habitat connectivity, to sustain viable subpopulations throughout the species' range.
- Where hollows are limiting, consider the use of nest boxes and artificial hollows that are suitable for the species. Monitor use of these structures to ensure they are being utilised, and revise designs or placement as required.
- Restore habitat and connectivity:
 - where habitat has been substantially fragmented, disturbed or modified,
 - between small habitat patches and larger areas of contiguous forest,
 - at a landscape scale through projects such as the Great Eastern Ranges Initiative, to facilitate movement and recolonisation of areas impacted by fires, droughts or other factors, and to provide opportunities for the species to adapt to the changing climate,
 - following climate-ready restoration guidelines (e.g. Hancock et al. 2018), and
 - following the National Restoration Standards (Standards Reference Group SERA 2021).

Climate change:

- Undertake habitat restoration to improve micro-climate conditions in areas at high risk of extreme temperatures and drought.

Invasive species:

- Develop and implement longer-term strategies to control predation by the European red fox and feral cat, as detailed in the relevant Threat Abatement Plans.

Other actions can be undertaken to support conservation and inform effective implementation such as surveys and research opportunities. Information and research priorities can be developed to investigate how the species interacts with habitat and moves across the landscape. The conservation advice for the species recommends survey and monitoring priorities which focuses on:

- determine trends in abundance and distribution,
- ascertain the status and viability of subpopulations,
- assess the impacts of compounding threats, and
- evaluate the relative benefits and effectiveness of management actions.

For the purposes of the conservation program, these strategies and actions are to be considered in design and implementation of the action plans to improve conservation of the koala in the Bowen Basin in line with government policy.

4.3 Conservation Program Activities

Independent suitably qualified expert/s will be appointed by the Steering Committee to develop activities for the Conservation Program that will be funded by contributions made over 10 years, targeting koala and greater glider in the Bowen Basin. The focus will extend outside of the Olive Downs Mine and broader Complex to also consider areas across the Bowen Basin to achieve broader conservation outcomes for these species. These activities will be detailed in activity plans prepared in accordance with approval condition 37, which stipulates the following:

At a minimum, the following information, prepared by an independent suitably qualified expert, must be provided to the Department prior to commissioning each activity:

- a) commitments, including financial commitments and proposed timeframes, that will be implemented to support the undertaking of the activity;*
- b) the proposed timeframe for undertaking the activity;*
- c) the independent suitably qualified expert/s who has designed and will implement the activity;*
- d) timing of a peer-review of the outcomes of the activity;*
- e) the proposed peer-reviewed scientific journal and/or other method/s to ensure the outcomes of the activity is made publicly available; and*
- f) details, with supporting evidence, of the consultation undertaken (including with the Queensland Government and relevant Recovery Teams) on how the activity can complement and/or align with other studies for the Koala and Greater Glider in the Bowen Basin.¹*

Consultation with relevant stakeholders will occur during the development of these activities. All reasonable efforts will be made to collaborate with academic organisations including supervising and supporting honours, Masters or PhD students as well as Indigenous groups and local government.

Activity plans are to be developed to include:

- Description of the activity;
- Objectives for the activity and performance outcomes to be achieved;
- How the activity will be implemented;
- Who will implement the activity;
- Overview of consultation undertake to inform the activity plan with stakeholders including, but not limited to, environmental groups, government agencies and universities;
- Funds committed to achieve the performance outcomes;
- Timing of peer-review reporting; and
- Timing of the activity completion and outcomes report issued.

In accordance with the Approval, the Conservation Program is to provide better protection and long-term conservation outcomes for the koala and greater glider in the Bowen Basin and, at a minimum, Program activities in condition 36 as follows:

- Translocation programs to translocate Koala and Greater Glider individuals from the project area during pre-clearance surveys and clearing to determine its success in reducing individual mortality and its effects on the population size of the greater glider;
- Revegetate, rehabilitate and restore habitat in the riparian zones associated with watercourses to create and maintain koala and greater glider habitat connectivity;
- Surveys to determine koala and greater glider population density and carrying capacity across the Bowen Basin; and
- Implement priorities identified in relevant recovery plans, threat abatement plans and/or approved conservation advices, and evaluate their success and cost-effectiveness.

In addition to the activities required by the Approval, examples of activities that can be investigated and further scoped by independent suitably qualified experts for koalas and greater glider are provided in **Table 4** and **Table 5**. These activities are to be designed to achieve the objectives of the Conservation Program. The suggested activities consider research and on-ground implementation in line with species recovery plans as well as opportunities present to manage and mitigate known threats to the species.

¹ Approval Condition 37

The review to be undertaken at Year 5 can assist with scoping the activities of the subsequent 5 years; outcomes of the review may identify gaps in the Program or direct efforts to perform more effectively.

Table **OFFICIAL** 4 Activities to achieve conservation outcomes for koala in the Bowen Basin

ACTIVITY	OUTCOME	DESCRIPTION AND IMPLEMENTATION	CONSISTENCY WITH SPECIES LISTING ADVICE/ PLANS
Koala population and dispersal study across various sites in Bowen Basin. Objective is to establish presence of koala populations and population size, home range size, habitat preferences and dispersal patterns. Data will also be obtained on population health and identify localised threats. Genetic information could also be gathered on different koala populations in the Bowen Basin. Within this context the works will consider Koala translocation² practices associated with operational clearing practices to determine the influence upon individual mortality and the localised population.	<i>The koala population study will provide critical information on the size and health of koala populations in Bowen Basin and inform required management actions. It will also be used as baseline to monitor over time to track the changes in populations. The outcome of this activity can be used to inform the implementation of other activities of the Conservation Program.</i>	The objective is to establish a greater understanding of koala populations and their dispersal patterns across the Bowen Basin. This will allow these populations to be better understood, monitored and protected over time. Similar to koala population studies in South-East Queensland, a baseline of population data can be gathered to understand koala population densities, dispersal patterns, habitat preferences and threats. This baseline data can then be used to monitor how these populations are tracking over time. It will also help to inform management actions to ensure their long-term sustainability in the Bowen Basin. Opportunities could be explored to collar and track individuals across different locations to obtain accurate information on translocation practices, habitat utilisation, health and dispersal patterns including use of cleared or disturbed land versus remnant bushland. Implementation: Opportunities to tie in with existing koala studies with academic institutions will be explored, or funding a masters or PhD student.	The proposed koala population study is consistent with the Koala Recovery Plan (DAWE 2022). The recovery plan states: • Substantial gaps exist in our knowledge of the distribution, population size and trends of the listed Koala in northern and inland Queensland. • Undertaking research on koala populations is a priority 2 action identified as 'essential' (DAWE 2022). • Objectives of the recovery plan are to be able to demonstrate area of occupancy of representative sample of koala populations is maintained or increased, and population health is maintained or improved. The proposed koala population study for Bowen Basin would support these objectives and provide meaningful information on these inland populations.

² Translocation in this instance is as defined by the International Union for the Conservation of Nature (IUCN) which states "the human-mediated movement of an organism from one area to another".

		Year 1 would include writing up the research study. Years 2 to 4 would be implementing the study and Year 5 writing up results.	
Reduce koala mortality on roads by working with road authorities in the Bowen Basin to identify koala “hot spots” and fund measures to reduce mortality.	<i>The activity will reduce koala injury and mortality as a result of vehicle strike and therefore improve the viability of the local population.</i>	The objective of this activity is to reduce koala mortality on roads. There are a number of major highways across the Bowen Basin that have a high volume of vehicles and trucks which intersect koala habitats. The Peak Downs Highway results in a high number of koala deaths each year. The objective of this action is to identify hot spots for koala mortality and install measures to reduce the number of deaths. It may include use of flashing signs at key times of the day and breeding season telling motorists to slow down and look out for koalas. Implementation: The activity may include installation of exclusion fencing and/or installation of larger culverts to direct koalas to under the road. Other technology could be explored such as installation of remote cameras at hot spots that have inbuilt artificial intelligence (AI) to detect an animal the size of a koala. If a koala is detected, a sound and flashing light can be triggered to deter the koala from crossing, and also alert a motorist. Where possible monitoring should also be implemented to gauge the effectiveness of these measures. Year 2 may be to identify areas of highway or road in Bowen Basin that have merit for work to be done to reduce koala deaths. Year 3 will be installing the proposed measures.	A reduction in koala deaths will support the goal of the Koala Recovery Plan which is to stop the trend of decline in population size of the listed koala, by having resilient, connected, and genetically healthy metapopulations across its range, and to increase the extent, quality and connectivity of habitat occupied. Vehicle strike is a recognised threat to koalas. In particular, young males in breeding season are often struck by vehicles as they move larger distances to mate³. Avoiding and mitigating direct threats is a priority 2 action identified as ‘essential’ (DAWE 2022).

³ Dexter. C.E, 2023, Koalas in space and time: Lessons from 20 years of vehicle-strike trends and hot spots in South East Queensland, Austral Ecology, vol 49, Issue 2.

Year 4 would be writing up results of the activities including any monitoring results.

Identify riparian corridor vegetation for restoration and/or revegetation in the Bowen Basin. These riparian corridors will either be known to be utilised by koalas, or the area is currently degraded but is a known critical linkage between habitat patches.

Through the restoration/revegetation of the riparian corridor, there will be an increase in the availability of foraging habitat and safe dispersal for the species. These restoration areas will be on land where the area will be conserved and protected on title to ensure long term outcomes.

The activity will result in an increase in protected koala habitat, increase in foraging resources and connectivity for the species between habitat areas.

In consultation with stakeholders across Bowen Basin including local governments, mining companies and other third parties, locations will be assessed and selected to undertake restoration of riparian corridor vegetation.

Implementation: suitable sites will be selected to undergo targeted actions to improve the quality of habitat and availability of habitat features and resources for the key species. This may include revegetation or weed and pest management.

Note that available budget will scope the extent to which this activity will be implemented and will inform the location and size of efforts, however targeted sites could overlap with areas also supporting greater glider habitat values.

To maximise the efficiency of investment, it may be possible to utilise land owned by a local or state government that may be willing to allow the restoration to occur and apply a legally binding mechanism on that land to ensure the area was protected from future development.

Ongoing maintenance should be considered when scoping this activity plan as access may be required for a period of time.

Year 1 would be establishing budgets and undertaking consultation to identify the appropriate site.

Years 2 to 3 would be completing the revegetation/restoration actions.

Years 4 and 5 would be maintenance and reporting

Restoring koala habitat and increasing the overall area of protected koala habitat on private or leasehold land is a priority 1 action (DAWE 2022). The goal of the recovery plan is to increase the extent, quality and connectivity of habitat occupied.

Objectives include:

- Strategically restore listed Koala habitat (Strategy 5)
- Identify spatially and temporally strategic areas of high priority for: (i) restoration and revegetation based on Koala and eucalypt population viability; (ii) climate and fire refugia; and (iii) corridors facilitating movement and metapopulation processes of Koalas,
- Increasing the overall area of protected koala habitat (Strategy 3).

Table 5 Activities to Achieve Conservation Outcomes for Greater Glider

ACTIVITY	OUTCOME	DESCRIPTION AND OBJECTIVE	CONSISTENCY WITH SPECIES LISTING ADVICE/ PLANS
Determine what is the success rate of translocated greater gliders in Central Queensland? Can translocation be used as an effective mitigation measure for the greater glider, and under what conditions does translocation succeed?	<i>The activity will support an understanding as to whether translocating greater glider could be an effective mitigation measure.</i>	Explore potential to collar and relocate greater glider from Stage 2 impact area at Olive Downs to suitable adjacent habitat. Implementation: Monitor these individuals over a period of at least 12 months to gain information on their health, dispersal, habitat utilisation including the use of nest boxes. Do the species survive translocation and how far do they disperse? Year 1 will be developing this research study. Year 2 and 3 will be implementing this study. Year 4 will be writing up results.	Conservation Advice for greater glider (southern and central) (DCCEEW 2022) identifies land clearing and fragmentation of habitat as key threats to the species. Therefore, gaining more detailed information on the species dispersal patterns, and ability to recolonise in areas they are translocated into from a clearing area, will be key to understanding if this is a useful management tool. Understanding their dispersal will also help inform future management actions in relation to clearing distances they can cross, how often they may go to ground, and where threats lie.
Nest box study Do greater gliders use nest boxes? Do they have a preference for a certain type of nest box and is temperature a determining factor? Do nest boxes provide supplementary denning habitat for greater glider in non-remnant forest? Can nest boxes provide denning habitat in areas	<i>This activity will identify the effectiveness of nest boxes to provide denning habitat for Greater Glider and if they will allow Greater Glider to colonise new areas of habitat. Outcomes of this study will be shared to inform implementation and success of nest boxes.</i>	This activity will tie in with the greater glider translocation and monitoring study as well as build on work being done for Stage 1 of the Olive Downs Project. There are already over 500 nest boxes installed to compensate for hollows lost in Stage 1. Implementation: additional nest boxes will be installed to compensate for lost hollows in Stage 2. To inform the implementation of nest boxes in Stage, a nest box study will evaluate the success of installed nest boxes in Stage 1. The study could:	Conservation Advice for greater glider (DCCEEW 2022) summarises poor results from previous nest box programs. However the nest boxes installed at Olive Downs targeting greater glider are showing good success rates with > 10% of all boxes containing greater glider including females and young. Being able to understand the effectiveness of nest boxes as a supplementary denning resource is

that would not normally support them.

Undertake a comprehensive nest box monitoring program to determine uptake by resident and translocated greater gliders and non-target species.

- Determine the use/success of the nest boxes, including confirming if they provide denning resources for translocated gliders
- establish any preference for nest box types
- does installing nest boxes in areas with no natural hollows provide them with more suitable denning habitat to disperse into; and
- determine if temperatures in nest boxes affect utilisation by greater glider.

Year 1 will include developing the research study.

Years 2 to 4 will be undertaking monitoring of nest boxes and tracking use of greater glider including translocated gliders.

Year 5 will be writing up results. and may include installation of nest boxes for Stage 2.

critical for the conservation of the species into the future. If hollows are lost either through approved clearing or bushfire for example, nest boxes can supplement or provide an alternative denning resource in a short timeframe while natural hollows develop. Understanding what makes the nest boxes most effective will be an important part of the study. Monitoring nest boxes is one of the conservation and management priorities of conservation advice (DCCEEW 2022). The outcomes of the study can inform implementation of nest boxes across the country and may improve the success rate of utilisation.

Identify a riparian corridor for restoration and /or revegetation in Bowen Basin. These riparian corridors will either be known to be utilised by greater glider, or the area is currently degraded but a known critical linkage between habitat patches.

Through the restoration/revegetation of the riparian corridor it will increase the availability of foraging, denning and dispersal habitat for the species.

These restoration areas will be on land where the area will be conserved and protected on

The proposed activity will result in restoration of greater glider habitat, an increase in foraging resources and improved connectivity between habitat patches.

In consultation with stakeholders across Bowen Basin including local governments, mining companies and other third parties, locations will be assessed and selected to undertake restoration of riparian corridor vegetation.

Implementation: suitable sites will be selected to undergo targeted actions to improve the quality of habitat and availability of habitat features and resources for the key species. This may include revegetation or weed and pest management.

Note that available budget will scope the extent to which this activity will be implemented including inform the location and size of efforts, however targeted sites could overlap with areas also supporting koala habitat values.

To maximise the efficiency of investment, it may be possible to utilise land owned by a local or state government that may be willing to allow the restoration to

The Conservation Advice for greater glider (DCCEEW 2022) identifies the restoration of habitat and connectivity as a key conservation action. It is recommended to occur where habitat has been substantially fragmented, disturbed or modified, areas between small habitat patches and larger areas of contiguous forest, and follow climate -ready restoration guidelines.

title to ensure long term outcomes.

Explore potential to supplement these riparian corridors with nest boxes to build on success at Olive Downs.

occur and apply a legally binding mechanism on that land to ensure the area was protected from future development. Ongoing maintenance should be considered when scoping this activity plan as access may be required for a period of time.

Year 1 would be establishing budgets and undertaking consultation to identify the appropriate site.

Years 2 to 3 would be completing the revegetation/restoration actions.

Years 4 and 5 would be maintenance and reporting.

4.4 Reporting

The Approval specifies conditions that require the Approval to report on the implementation and outcomes of the funding contributions and success of the Conservation Program.

Table 6 outlines the program of reporting required to meet the conditions of Approval.

Table 6 Program of reporting

DOCUME NT	RESPONSI BITY	TIMING	SUBMISSI ON REQUIRE D TO THE DEPARTM ENT	RELEVA NT CONDITI ON
Financial Framework supported by Conservation Program	Approval holder	Prior to commencement of Stage 2 Year 1	Yes	33 and 34
Annual Financial Contribution Reporting	Approval holder	Notice of fulfilled financial contribution to DCCEEW to occur annually within 20 business days of total allocated financial contribution being achieved Year 2 onwards	Yes	35
Activity Plan	Suitably qualified person/s Independent suitably qualified expert	Activities Implemented Report provided to the Department prior to commissioning of each activity	Yes	36, 37

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Peer-review	Approval holder to support steering committee engagement of a suitably qualified ecologist	At the completion of each Activity Year 5	Yes and made publicly available	38
Financial contribution review	Approval holder	Must commence 5 years after the date of the first financial contribution Report provided to the Department within 6 months of the commencement of the review – being 5 years and 6 months	Yes	39 and 40
Final report	Approval holder	End of Year 10	No	-

References

Department of Agriculture, Water and the Environment, February 2022a, Conservation Advice for *Phascolarctos cinereus* (Koala) combined populations of Queensland, New South Wales and the Australian Capital Territory, <http://www.environment.gov.au/biodiversity/threatened/species/pubs/85104-conservation-advice-12022022.pdf>.

Department of Agriculture, Water and the Environment, March 2022b, National Recovery Plan for the Koala *Phascolarctos cinereus* (combined populations of Queensland, New South Wales and the Australian Capital Territory), <https://www.dcceew.gov.au/sites/default/files/documents/recovery-plan-koala-2022.pdf>.

Department of Climate Change, Energy, the Environment and Water, July 2022, Conservation Advice for *Petauroides volans* (greater glider (southern and central)) <https://www.environment.gov.au/biodiversity/threatened/species/pubs/254-conservation-advice-05072022.pdf>.

IUCN/SSC (2013). Guidelines for Reintroductions and Other Conservation Translocations. Version 1.0. Gland, Switzerland: IUCN Species Survival Commission, viiii + 57 pp.

Attachment E

Stage 2 Commencement Notification

27 October 2025

EPBC Compliance
Department of Climate Change, Energy, the Environment and Water
Via email/[REDACTED]

Subject: Notification commencement of Stage 2 action

To Whom It May Concern,

In accordance with EPBC Referral 2017/7867 Conditions 67 the purpose of this letter is to formally advise the Department that activities associated with the stage 2 action commenced on 23 October 2025.

Should you require any further information, please do not hesitate to contact me on 07 3177 4940 or via email at ngaire.tranter@pembrokeresources.com.au.

Yours sincerely,

[REDACTED]

[REDACTED]

Head of Approvals & Environment