Annual Compliance Report - Offshore Dredge Spoil Disposal – Mardie Project (EPBC 2024/10054)

REPORTING PERIOD:
28 NOVEMBER 2025 TO 10 SEPTEMBER 2026

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1. DECLARATION OF ACCURACY

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

Signed:

Name: Shaun Meredith

Position: Head of Environment and Heritage

Organisation: Mardie Minerals Pty Ltd
ABN 50 152 574 457

Date: 8 October 2026

2. MARDIE MINERALS PTY LTD AND BCI MINERALS LIMITED

The Mardie Project is 100% owned by the Approval Holder, Mardie Minerals Pty Ltd, ABN 50 152 574 457 (Mardie). Mardie is a wholly owned subsidiary of BCI Minerals Limited, ACN 120 646 924 (BCI).

3. DESCRIPTION OF ACTION AND ACTIVITIES

3.1 Action and Compliance Report details

Mardie was granted approval EPBC 2024/10054 (the Approval) on 28 November 2025 by the Department of Climate Change, Energy, the Environment and Water (DCCEEW), to transport and dispose of dredge spoil from the Capital Dredging Program and the Maintenance Dredging Program of the Mardie Project (EPBC 2018/8236 and EPBC 2022/9169) within defined offshore spoil ground 'DMPA4'in Western Australia (WA) state waters, approximately 20 km offshore from the Mardie Project.

Table 1: Summary of Action and Compliance Report Details

EPBC Numbers	2024/10054
Project Name	Offshore Dredge Spoil Disposal – Mardie Project
Approval Holder and ABN	Mardie Minerals Pty Ltd ABN: 50 152 574 457
Approved Action	To transport and dispose of dredge spoil from the Capital Dredging Program and the Maintenance Dredging Program of the Mardie Project (EPBC 2018/8236 and EPBC 2022/9169) within defined offshore spoil ground 'DMPA4'in Western Australia (WA) state waters, approximately 20 km offshore from the Mardie Project, 80 km southwest of Karratha, Pilbara region, WA (See EPBC Act referral 2024/10054).
Location of Project	80 kilometres south-west of Karratha, in the Pilbara region of Western Australia.
Person accepting responsibility for this Compliance Report	Shaun Meredith
Reporting period	28 November 2025 to 10 September 2026
Date of Compliance Report	8 October 2026

3.2 Description of activities undertaken in reporting period

BCI is undertaking the Mardie Project, a solar salt and sulphate of potash production plant and associated export facility at Mardie, approximately 80 km south-west of Karratha in Western Australia. The Project includes two seawater intakes, brine discharge, evaporation and crystalliser ponds, processing plant, causeway, trestle jetty with associated dredge channel, and supporting infrastructure. To facilitate the export of salt and sulphate of potash, BCI has had to undertake capital dredging works to develop a transhipment berth pocket and transhipment channel.

Mardie Minerals is the holder of Sea Dumping Permit S2024-4074 issued under Sections 19 and 21 of the *Environment Protection (Sea Dumping) Act 1981* for the disposal of up to 355,000 m³ (in situ) of capital dredged material associated with the Project. Capital dredging and associated dredged material disposal activities were undertaken between 12 May 2026 and 12 September 2026, with all disposal activities completed within this period.

4. PURPOSE AND SCOPE

This Annual Compliance Report (ACR) has been prepared to satisfy conditions 31 and 32 of EPBC 2024/10054, as detailed below.

Condition 31

The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period).

Condition 32

The approval holder must ensure each compliance report includes:

a) accurate and complete details of compliance and any non-compliance with:

   i) WA Approval, if a condition attached to this approval decision requires compliance with that WA Approval condition,

   ii) each condition attached to this approval decision, and

   iii) all commitments made in each plan;

b) a schedule of all plans in effect in relation to these conditions during the ACR period;

c) accurate and complete details of how each plan was implemented during the ACR period; and

d) if any incident occurred, accurate and complete details of each incident.

5. OVERVIEW OF MANAGEMENT PLANS

Four management plans are required to be developed, approved and implemented at varying stages of the Action. In accordance with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023, below is a summary of the Management Plans conditionally required under EPBC 2024/10054, their approval status and implementation are summarised below.

5.1 Disease Monitoring and Management Plan

In the event of unusual mortality, or emerging disease of protected matters or detection of harmful algal blooms or biotoxin, attributable to the Action, within two months of detecting any such event, BCI must submit a Disease Monitoring and Management Program to mitigate harm to protected matters to the department for the Minister's approval.

BCI did not detect any incidents of mortality or emerging disease during the reporting period and as such no plan was developed, submitted or implemented during the reporting period.

5.2 Illumination Plan

The Illumination Plan has been developed to monitor and manage potential impacts of artificial light on fauna of conservation significance and their habitats.

During the reporting period, an update to the Illumination Plan was undertaken to accommodate changes to lighting at the Secondary Sea Water Intake. Revision 3 of the Illumination Plan was submitted to DWER and DCCEEW on 20 January 2026. The Plan was approved by DWER on 8 April 2026 and is awaiting approval by the National Environmental Protection Agency (National EPA).

The annual light audits were conducted in September 2025 and September 2026, prior to the annual marine turtle nesting season. Both these audits fall outside the reporting period for this compliance report.

The light monitoring was undertaken in accordance with the Illumination Plan and Marine Turtle Monitoring Program. The 2025 audit found no compliance criteria or plan indicators were exceeded, and the monitoring confirmed compliance with the relevant conditions of MS 1264, EPBC 2018/8236 and EPBC 2022/9169.

All activities were undertaken as per the commitments made within the approved Illumination Plan.

5.3 Dredge and Spoil Disposal Management Plan

Condition 13b) of EPBC 2024/10054 requires the implementation of the Mardie Project Dredge and Spoil Disposal Management Plan (DSDMP) – Revision 5. This management plan was implemented for during the reporting period.

Condition 13a) of EPBC 2024/10054 requires, a revised DSDMP, including appropriate avoidance and mitigation measures recommended by a suitably qualified ecologist to manage harm to protected matters including Sawfish and Shark, to be submitted. During the reporting period, DSDMP (Rev 6) was submitted to DCCEEW for assessment and approval on 16 April 2026, prior to the commencement of the Action.

The DSDMP was further revised after the collection of baseline water quality results. BCI proposed to amend water quality triggers and thresholds based on the available baseline data. After assessment of Revision 7, feedback from DCCEEW was included and Revision 8.2 was submitted for approval. The DSDMP Revision 8.2 was approved for dredging activities under Ministerial Statement 1286, EPBC 2018/8236 and EPBC 2022/9169. BCI is awaiting approval of the revised DSDMP under EPBC 2024/10054 for disposal activities.

During the capital dredging campaign, dumping activities were undertaken in accordance with the approved DSDMP. While DSDMP Revision 8.2 was submitted for approval, it was not approved or implemented for dumping activities during the reporting period.

In addition, as previously notified to the DCCEEW by letter dated 16 April 2026, Mardie Minerals implemented the interim Hybrid Marine Water Quality Monitoring Methodology during the early stages of the capital dredging campaign following damage to the telemetered monitoring network caused by Tropical Cyclone Narelle. The hybrid methodology was implemented until such time when the monitoring network was fully reinstated on 22 July 2026.

The compliance status for commitments made within the DSDMP are outlined in Appendix 2.

5.4 Shipboard Oil Pollution Emergency Plan

The Shipboard Oil Pollution Emergency Plan (SOPEP) was developed for vessels involved in the Mardie Project's capital dredging program. These plans, along with the Best Practise Bunkering Procedure, were published to the BCI website as per the requirement of Condition 9 of EPBC 2024/10054.

The bunkering procedure was implemented during disposal operations however no oil spills were recorded and as such the SOPEP was not implemented during the reporting period.

6. COMPLIANCE WITH APPROVAL CONDITIONS

BCI has considered and assessed its compliance with each of the 49 conditions of EPBC 2024/10054. An assessment of compliance with these conditions and each sub-element is presented in Appendix 1. There were 99 elements assessed for compliance and BCI is reporting compliance with 52 elements, with the remaining 47 elements not applicable during the reporting period.

Appendix 1: EPBC 2024/10054 Compliance Audit Table

Condition Number	Condition	Compliance Status	Evidence/Comments
1(a)	The approval holder must not: a) transport or dispose of dredge spoil material outside of the Action area;	Compliant	To ensure compliance with the condition, all transport and disposal activities were tracked using vessel positioning systems to ensure activities remained within the Action area.
1(b)	The approval holder must not: b) dispose of dredge spoil material outside of the dredge spoil site;	Compliant	The dredge material was placed within the disposal site using split hopper barges, with controlled bottom dumping. To ensure compliance with the condition, all dumping activities were tracked using vessel positioning systems to ensure accurate placement within the disposal site. Daily reports from vessel operators show the vessel positioning systems that ensure accurate placement within disposal site for each disposal event of the dredge material from the split hopper barges.
1(c)	The approval holder must not: c) dispose of dredge spoil material greater than the volume approved for Mardie Projects EPBC 2018/8236 and EPBC 2022/9169.	Compliant	Sea Dumping Permit SD2024-4074 restricted the volume of disposed material to 355,000 m^3 which is less than the volumes approved by EPBC 2018/8236 & EPBC 2022/9169. Progress reports from the contractor indicate that the volume of material disposed is within the stated limits however the final bathymetric surveys are yet to be completed. The final reports will be compiled in consultation with the dredging contractor and provided when available.
2	To avoid and mitigate harm to protected matters, the approval holder must ensure that no disposal operation is undertaken during any period commencing on 1 October and ending on 31 March of the following year.	Compliant	Dredging and disposal activities commenced on 27 April 2026 and ceased on 12 September 2026 which outside of the restricted period.
3(a)	To avoid and mitigate harm to protected matters during good visibility conditions the approval holder must: a) ensure that a Marine Fauna Observer (MFO) is present and able to monitor protected matters at all times during any disposal operation. The MFO must have access to equipment suitable to detect, monitor, and record protected matters at all times and must not undertake any other duties during any disposal operation;	Compliant	The trained and dedicated marine fauna observers had access to suitable equipment to detect, monitor and record marine species throughout dumping activities, including binoculars, and cameras. Observation positions provided clear visibility of the observation and exclusion zones. During the ecological window of June to September, the dedicated marine fauna observers were assigned solely to marine fauna observation duties and did not undertake any other duties. Compliance is evidenced by marine fauna observer logs, daily vessel reports, equipment records and contractor documentation.

3(b)	To avoid and mitigate harm to protected matters during good visibility conditions the approval holder must: b) ensure the MFO undertakes continuous observations of the exclusion zone at the dredge spoil site for at least 30 minutes prior to commencing each disposal operation ;	Compliant	Marine fauna observer logs show that observations were undertaken for at least 30 minutes prior to disposal activities.
3(c)	To avoid and mitigate harm to protected matters during good visibility conditions the approval holder must: c) ensure that if a protected matter is sighted within the exclusion zone at the dredge spoil site, a MFO continuously monitors the protected matter and records in the Marine Fauna Observation Log;	Compliant	Marine fauna observer logs record of all marine fauna sightings recorded during the completion of disposal activities. Records show that any marine fauna within the exclusion zone was monitored and recorded.
3(d)	To avoid and mitigate harm to protected matters during good visibility conditions the approval holder must: d) immediately cease the disposal operation if it is safe to do so if one or more protected matter is sighted within the exclusion zone at the dredge spoil site;	Compliant	Marine fauna observer logs record of all marine fauna sightings recorded during the completion of disposal activities. Records indicate where mitigation action (i.e. shut down/power down or delayed start) to activities were actioned due to marine species being sighted in the exclusion zone.
3(e)	To avoid and mitigate harm to protected matters during good visibility conditions the approval holder must: e) record the shut-down event and required data in the Marine Fauna Observation Log;	Compliant	Marine fauna observer logs record of all marine fauna sightings recorded during the completion of disposal activities. Records indicate where mitigation action (i.e. shut down/power down or delayed start) to activities were actioned due to marine species being sighted in the exclusion zone.
3(f)	To avoid and mitigate harm to protected matters during good visibility conditions the approval holder must: f) ensure that, after any shut-down event, disposal operations do not recommence for a period of at least 30 minutes after the MFO confirms that all protected matters have moved out of the exclusion zone.	Compliant	Marine fauna observer logs record of all marine fauna sightings recorded during the completion of disposal activities. Records indicate where mitigation action (i.e. shut down/power down or delayed start) to activities were actioned due to marine species being sighted in the exclusion zone.
4	To avoid and mitigate harm to protected matters during low visibility, the approval holder must not undertake any disposal operations unless, during the preceding 24-hour period: a) there have not been 3 or more shut-down events at the dredge spoil site; or b) a MFO undertook continuous observation over a period of at least 2 hours in good visibility immediately prior to the disposal operations and no protected matter was observed in the observation zone during that period.	Compliant	During any low-visibility conditions disposal did not occur unless the required conditions had been met.

5	If a protected matter is detected in the exclusion zone during poor visibility, the approval holder must shut down operations if it is safe to do so until the MFO confirms that no protected matter has been observed in the exclusion zone at the dredge spoil site for at least 30 minutes.	Compliant	Disposal operations were ceased, if safe to do so, if protected matters were detected in the exclusion zone and activities not resumed until the MFO had confirmed no protected matter within the zone for 30 minutes.
6	To avoid and mitigate harm to protected matters from vessel strike, the approval holder must implement vessel strike avoidance measures and comply with the vessel approach distances specified in the Dredge and Spoil Disposal Management Plan (DSDMP).	Compliant	The vessel strike avoidance measure stated within the DSDMP were implemented during the reporting period. Marine fauna observer logs record of all marine fauna sightings recorded by trained/dedicated marine fauna observers during dredging and dumping activities. No vessel strikes or harm to marine fauna occurred during disposal activities.
7(a)	To avoid and mitigate harm to protected matters from noise generated as a result of the Action, the approval holder must: a) Implement an observation zone and exclusion zone relevant to the disposal operation;	Compliant	The observation and exclusion zones were implemented as per the DSDMP. Marine fauna observation records provides evidence that these zones were implemented.
7(b)	To avoid and mitigate harm to protected matters from noise generated as a result of the Action, the approval holder must: b) minimise the duration of runtime for vessel engines, thrusters and dredging plant by avoiding stand-by or running mode to the degree practical and consistent with safe operations;	Compliant	Vessel operators reduced engine runtimes to the minimum possible.
7(c)	To avoid and mitigate harm to protected matters from noise generated as a result of the Action, the approval holder must: c) ensure all vessel equipment and machinery is in good condition and subject to regular maintenance.	Compliant	Vessel operators performed regular maintenance to ensure that all equipment was in good working order.
8(a)	To avoid and mitigate harm to protected matters from artificial light as a result of the Action, the approval holder must: a) implement the Mardie Illumination Plan;	Compliant	The Mardie Illumination Plan was implemented during the reporting period. All vessels associated with the Action reduced lighting as far as possible whilst maintaining compliance with safety and maritime requirements.
8(b)	To avoid and mitigate harm to protected matters from artificial light as a result of the Action, the approval holder must: b) ensure there are no artificial light sources other than those required for safe disposal operations as a result of the Action.	Compliant	All vessels associated with the Action reduced lighting as far as possible whilst maintaining compliance with safety and maritime requirements. No other light sources were used for disposal activities.
9(a)	To avoid and mitigate harm to protected matters from harmful chemicals, the approval holder must: a) not commence the Action unless it has developed and published on its website best practice procedures for bunkering, chemical storage and handling and a Shipboard Oil Pollution Emergency Plan;	Compliant	The Shipboard Oil Pollution Emergency Plan and Best Practice Bunkering Procedure were published to the BCI website prior to the commencement of the Action.

9(b)	To avoid and mitigate harm to protected matters from harmful chemicals, the approval holder must: b) implement the published procedures and, in the event of an oil spill, the published Shipboard Oil Pollution Emergency Plan;	Compliant	The bunkering procedure was implemented during disposal activities. No spills occurred during the reporting period and the Shipboard Oil Pollution Emergency Plan was not required to be implemented.
9(c)(i)	To avoid and mitigate harm to protected matters from harmful chemicals, the approval holder must: c) in the event of any hydrocarbon spill: i) cease the disposal operation at the location of the hydrocarbon spill until the spill has been contained;	Not Applicable	
9(c)(ii)	To avoid and mitigate harm to protected matters from harmful chemicals, the approval holder must: c) in the event of any hydrocarbon spill: ii) undertake a spill investigation to determine cause of the spill and the effectiveness of the response within 5 business days of the spill event;	Not Applicable	
9(c)(iii)	To avoid and mitigate harm to protected matters from harmful chemicals, the approval holder must: c) in the event of any hydrocarbon spill: iii) within 20 business days of any spill event, publish the report of the investigation on the website.	Not Applicable	
10(a)	To minimise indirect impacts of poor water quality on the habitat quality of protected matters, as a result of the Action, the approval holder must: a) implement the monitoring and management measures to protect Benthic Communities and Habitat as specified in the 'Management actions to minimise impacts on Benthic Community Habitats' section in the DSDMP;	Compliant	The monitoring and management actions within the DSDMP were implemented for disposal activities. The final BCH surveys are to be completed within 12 months of disposal completion and are yet to be undertaken. The results from this monitoring will be provided in the next annual report.
10(b)	To minimise indirect impacts of poor water quality on the habitat quality of protected matters, as a result of the Action, the approval holder must: b) ensure that photosynthetically active radiation levels within the dredge disposal site after disposal operation has been completed, do not exceed the pre-dredging baseline as specified in the DSDMP; and	Compliant	The monitoring and management actions within the DSDMP were implemented for disposal activities. The final disposal area monitoring is to be completed within 12 months of disposal completion and are yet to be undertaken. The results from this monitoring will be provided in the next annual report.

10(c)	To minimise indirect impacts of poor water quality on the habitat quality of protected matters, as a result of the Action, the approval holder must: c) ensure that turbidity levels within the Action area after disposal operation has been completed, do not exceed the pre-dredging baseline as specified in the DSDMP.	Compliant	The monitoring and management actions within the DSDMP were implemented for disposal activities. The final disposal area monitoring is to be completed within 12 months of disposal completion and are yet to be undertaken. The results from this monitoring will be provided in the next annual report.
11(a)	In the event of unusual mortality, or emerging disease of protected matters or detection of harmful algal blooms or biotoxin, attributable to the Action, within two months of detecting any such event, the approval holder must submit a Disease Monitoring and Management Program to mitigate harm to protected matters to the department for the Minister's approval. The Disease Monitoring and Management Program must: a) be prepared by a suitably qualified ecologist;	Not Applicable	No usual mortality or emerging disease was detected during the reporting period.
11(b)	In the event of unusual mortality, or emerging disease of protected matters or detection of harmful algal blooms or biotoxin, attributable to the Action, within two months of detecting any such event, the approval holder must submit a Disease Monitoring and Management Program to mitigate harm to protected matters to the department for the Minister's approval. The Disease Monitoring and Management Program must: b) include details of the relevant protected matters and a reference to EPBC Act approval conditions to which the plan refers;	Not Applicable	No usual mortality or emerging disease was detected during the reporting period.
11(c)	In the event of unusual mortality, or emerging disease of protected matters or detection of harmful algal blooms or biotoxin, attributable to the Action, within two months of detecting any such event, the approval holder must submit a Disease Monitoring and Management Program to mitigate harm to protected matters to the department for the Minister's approval. The Disease Monitoring and Management Program must: c) contain a table of commitments made in the plan to achieve the environmental outcomes, and a reference to exactly where these commitments are detailed in the plan;	Not Applicable	No usual mortality or emerging disease was detected during the reporting period.

11(d)	In the event of unusual mortality, or emerging disease of protected matters or detection of harmful algal blooms or biotoxin, attributable to the Action, within two months of detecting any such event, the approval holder must submit a Disease Monitoring and Management Program to mitigate harm to protected matters to the department for the Minister's approval. The Disease Monitoring and Management Program must: d) contain a monitoring program with performance indicators, trigger values for corrective measures, the timing and frequency of monitoring, ensuring monitoring is capable of detecting trigger values and changes in the performance indicators and proposed corrective measures if trigger values are reached.	Not Applicable	No usual mortality or emerging disease was detected during the reporting period.
12	The approval holder must commence implementing the approved Disease Monitoring and Management Program required under condition 11 within one month of the Minister approving it in writing.	Not Applicable	No usual mortality or emerging disease was detected during the reporting period.
13(a)	To avoid and mitigate harm as a result of the Action on protected matters, the approval holder must: a) prior to the commencement of the Action, revise and submit the Dredge and Spoil Disposal Management Plan (DSDMP) for Minister's approval, including appropriate avoidance and mitigation measures recommended by a suitably qualified ecologist to manage harm to protected matters including Sawfish and Shark;	Compliant	During the reporting period, a revised DSDMP (Rev 6), which included avoidance and mitigation measures recommended by a suitably qualified ecologist to manage harm to protected matters including Sawfish and Shark, was submitted to DCCEEW for assessment and approved on 16 April 2026, prior to the commencement of the Action.
13(b)	To avoid and mitigate harm as a result of the Action on protected matters, the approval holder must: b) implement the approved DSDMP until the completion of the Action.	Compliant	The approved DSDMP (Rev 5) was implemented during the reporting period.
14(a)	In implementing the DSDMP, the approval holder must achieve the following outcomes: a) no direct loss of Benthic Community Habitat (BCH) outside of the disposal disturbance footprint.	Compliant	The monitoring and management actions within the DSDMP were implemented for disposal activities. The final BCH surveys are to be completed within 12 months of disposal completion and are yet to be undertaken. The results from this monitoring will be provided in the next annual report.

14(b)	In implementing the DSDMP, the approval holder must achieve the following outcomes: b) BCH outside of the disposal Zone of High Influence (ZoHI) recovers to its baseline state or better within five years of the cessation of disposal operations.	Compliant	The monitoring and management actions within the DSDMP were implemented for disposal activities. The final BCH surveys are to be completed within 12 months of disposal completion and are yet to be undertaken. The results from this monitoring will be provided in the next annual report.
14(c)	In implementing the DSDMP, the approval holder must achieve the following outcomes: c) no adverse change as a result of the Action from the baseline state of BCH outside of the ZoHI and Zone of Medium Impact (ZoMI).	Compliant	The monitoring and management actions within the DSDMP were implemented for disposal activities. The final BCH surveys are to be completed within 12 months of disposal completion and are yet to be undertaken. The results from this monitoring will be provided in the next annual report.
14(d)	In implementing the DSDMP, the approval holder must achieve the following outcomes: d) no introduction or establishment of marine pests as a result of the Action;	Compliant	Baseline marine pest monitoring conducted at the Mardie Project identified 5 potential pest species. These were reported to the Department of Primary Industries and Regional Development with no further action required. No introduced marine pests have been detected at the Mardie Project as a result of the Action.
14(e)	In implementing the DSDMP, the approval holder must achieve the following outcomes: e) no mortality, injury, disturbance or displacement of any Humpback whale while migrating through the biologically important area; and	Compliant	Marine fauna observation records show that no mortality, injury, disturbance or displacement of Humpback whales was identified during the reporting period.
14(f)	In implementing the DSDMP, the approval holder must achieve the following outcomes: f) no protected matters are prevented or deterred from undertaking critical behaviours in biologically important areas.	Compliant	Marine fauna observation records show that no protected matters were prevented or deterred from undertaking critical behaviours in biologically important areas.
15	In order to achieve the outcomes outlined in condition 14 the approval holder must undertake disposal monitoring program specified in the DSDMP.	Compliant	The monitoring and management actions within the DSDMP were implemented for disposal activities.
16(a)	The approval holder may choose to revise a plan required to be implemented under condition 13 without submitting it for approval under section 143A of the EPBC Act, if: a) the taking of the Action in accordance with the revised plan would be consistent with the approved Action,	Compliant	The DSDMP was revised in accordance with this condition. Revision 7 of the DSDMP included refinement to the interpretation and application of marine water quality triggers for turbidity and light to better reflect site-specific baseline conditions, while retaining all EPA (2021) guideline values, monitoring requirements, response actions, and cessation thresholds.
16(b)	The approval holder may choose to revise a plan required to be implemented under condition 13 without submitting it for approval under section 143A of the EPBC Act, if: b) the taking of the Action in accordance with the revised plan would be consistent with the conditions attached to this approval,	Compliant	Revision 7 of the DSDMP was consistent with the conditions of this approval.

16(c)	The approval holder may choose to revise a plan required to be implemented under condition 13 without submitting it for approval under section 143A of the EPBC Act, if: c) the taking of the Action in accordance with the revised plan would not be likely to have a new or increased impact,	Compliant	As the change related to the monitoring methodology the revised plan was assessed by BCI to not likely have a new or increased impact.
16(d)(i)	The approval holder may choose to revise a plan required to be implemented under condition 13 without submitting it for approval under section 143A of the EPBC Act, if: d) the approval holder notifies the department electronically that it has prepared a revised version of the plan (the 'revised plan'). In notifying the department, the approval holder must specify each condition which references the plan and provide the department with: i) an electronic copy of the revised plan,	Compliant	An electronic copy of the revised plan was provided to the Department on 8 May 2026, at the time of notification.
16(d)(ii)	The approval holder may choose to revise a plan required to be implemented under condition 13 without submitting it for approval under section 143A of the EPBC Act, if: d) the approval holder notifies the department electronically that it has prepared a revised version of the plan (the 'revised plan'). In notifying the department, the approval holder must specify each condition which references the plan and provide the department with: ii) an electronic copy of the revised plan marked up with track changes to show the differences between the plan and the revised plan,	Compliant	An electronic copy of the revised plan marked up with track changes to show the differences between the plan and the revised plan was provided to the Department on 8 May 2026, at the time of notification.
16(d)(iii)	The approval holder may choose to revise a plan required to be implemented under condition 13 without submitting it for approval under section 143A of the EPBC Act, if: d) the approval holder notifies the department electronically that it has prepared a revised version of the plan (the 'revised plan'). In notifying the department, the approval holder must specify each condition which references the plan and provide the department with: iii) a comprehensive explanation of all differences between the plan and the revised plan,	Compliant	An explanation of the differences between the plans was provided to the Department on 8 May 2026, at the time of notification.

16(d)(iv)	The approval holder may choose to revise a plan required to be implemented under condition 13 without submitting it for approval under section 143A of the EPBC Act, if: d) the approval holder notifies the department electronically that it has prepared a revised version of the plan (the 'revised plan'). In notifying the department, the approval holder must specify each condition which references the plan and provide the department with: iv) a declaration that the approval holder has read and understands the Guidance on 'new or increased impact' relating to changes to approved management plans under EPBC Act environmental approvals, Commonwealth of Australia 2017,	Compliant	A declaration that the approval holder has read and understands the Guidance on 'new or increased impact' relating to changes to approved management plans under EPBC Act environmental approvals, Commonwealth of Australia 2017 was provided to the Department on 8 May 2026, at the time of notification.
16(d)(v)	The approval holder may choose to revise a plan required to be implemented under condition 13 without submitting it for approval under section 143A of the EPBC Act, if: d) the approval holder notifies the department electronically that it has prepared a revised version of the plan (the 'revised plan'). In notifying the department, the approval holder must specify each condition which references the plan and provide the department with: v) a comprehensive analysis and detailed discussion on the likelihood that taking the Action in accordance with the revised plan will not have, or will be not likely to have, a new or increased impact,	Compliant	An analysis and detailed discussion on the likelihood that taking the Action in accordance with the revised plan will not have, or will be not likely to have, a new or increased impact was provided to the Department on 8 May 2026, at the time of notification.

16(d)(iv)	The approval holder may choose to revise a plan required to be implemented under condition 13 without submitting it for approval under section 143A of the EPBC Act, if: d) the approval holder notifies the department electronically that it has prepared a revised version of the plan (the 'revised plan'). In notifying the department, the approval holder must specify each condition which references the plan and provide the department with: vi) written notice of the date on which the approval holder will implement the revised plan (the 'revised plan implementation date'), being at least 30 business days after the date of providing notice of the revision of the plan, or a date agreed to in writing with the department, and	Compliant	The notification provided the date for implementation of the revised plan (19 June 2026) being no less than 30 business days after providing notification.
16(d)(vii)	The approval holder may choose to revise a plan required to be implemented under condition 13 without submitting it for approval under section 143A of the EPBC Act, if: d) the approval holder notifies the department electronically that it has prepared a revised version of the plan (the 'revised plan'). In notifying the department, the approval holder must specify each condition which references the plan and provide the department with: vii) a copy of the compliance report for the latest ACR period and a statement of any relevant history of compliance (including non-compliance) in relation to the plan	Compliant	A statement of any relevant history of compliance (including non-compliance) in relation to the plan was provided to the Department on 8 May 2026, at the time of notification.
17	The approval holder must commence implementation of the revised plan from the revised plan implementation date unless otherwise notified in writing by the Minister .	Compliant	The revised plan was not implemented as approval under Sea Dumping Permit SD2024-7074, which is also required, has not been received.
18(a)	If the Minister notifies the approval holder that the Minister is satisfied that the taking of the Action in accordance with a plan which has been revised without submitting it for the Minister's approval would be likely to have a new or increased impact, then: a) the approval holder's ability to revise a plan without submitting the plan for Minister approval does not apply, or ceases to apply, in relation to the revised plan,	Not Applicable	Not notification from the Minister in regard to DSDMP (Rev 7) was received.

18(b)	If the Minister notifies the approval holder that the Minister is satisfied that the taking of the Action in accordance with a plan which has been revised without submitting it for the Minister's approval would be likely to have a new or increased impact, then: b) the approval holder must implement the plan in force immediately prior to that revised plan or a version of the plan specified by the Minister in the notice, and	Not Applicable	Not notification from the Minister in regard to DSDMP (Rev 7) was received.
18(c)	If the Minister notifies the approval holder that the Minister is satisfied that the taking of the Action in accordance with a plan which has been revised without submitting it for the Minister's approval would be likely to have a new or increased impact, then: c) the Minister may also notify that, for a specified period, the approval holder's ability to revise a plan without submitting the plan for Minister approval does not apply for one or more specified plans.	Not Applicable	Not notification from the Minister in regard to DSDMP (Rev 7) was received.
19	The approval holder may, at any time by giving written notice to the department, revoke its choice to implement a plan which has been revised without submitting it for the Minister's approval. If the approval holder revokes the choice to implement a revised plan, the approval holder must implement the plan in force immediately prior to that revised plan.	Not Applicable	BCI did not revoke its choice to implement a plan.
20	Wherever these conditions require the approval holder to submit any plan to the department, all such plans must be submitted to the department electronically.	Compliant	All plans required by this approval have been submitted to the Department electronically.
21(a)	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date: a) of this approval, if the version of the plan to be implemented is specified in these conditions,	Compliant	All approved plans (DSDMP – Rev 5, Illumination Plan) have been published to the BCI website within the specified timeframe.
21(b)	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date: b) the plan is approved by the Minister in writing, if the plan requires the approval of the Minister,	Not Applicable	No plan was approved by the Minister in accordance with this approval during the reporting period.

21(c)	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date: c) the plan is submitted to the department in accordance with a requirement of these conditions, if the plan does not require the approval of the Minister.	Compliant	The Shipboard Oil Pollution Emergency Plan and Best Practise Bunkering Procedure did not require Ministerial approval and were published to the BCI website within the specified timeframe.
22	The approval holder must keep all plans published on the website, in a format that is easily accessible and downloadable, from the first date which that plan must be published and until the expiry date of this approval. This requirement applies to all current and superseded versions of plans.	Compliant	All plans remain on the BCI website.
23	The approval holder is required to exclude or redact sensitive biodiversity data from any version of a plan before that plan is published on the website or otherwise provided to a member of the public. If sensitive biodiversity data is excluded or redacted from a plan, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.	Not Applicable	No sensitive information is included in the plans.
24	The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days following commencement of the Action.	Compliant	BCI notified the Department of the commencement of the Action on 29 April 2026 (BCI Ref: 0000-EV-LET-0623) which is within the 5-day timeframe.
25	The approval holder must not commence the Action later than 5 years after the date of this approval decision.	Compliant	The Action was commenced within 5 years after the date of this approval decision.
26	The approval holder must maintain accurate and complete compliance records and document the procedure for recording and storing compliance records.	Compliant	BCI maintains accurate and complete compliance records and has a procedure for document recording and storage.
27	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.	Not Applicable	No request has been received.
28	The approval holder must ensure that any monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guidelines for biological survey and mapped data, Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing.	Compliant	All data collected meets the requirements.

29	The approval holder must ensure that any monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guide to providing maps and boundary data for EPBC Act projects, Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.	Compliant	All data collected meets the requirements.
30	The approval holder must submit all monitoring data, surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) for disposal operations undertaken within the Annual Compliance Report period as part of a compliance report, as per Condition 30, electronically to the department except where otherwise specified in a plan.	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be provided during the reporting period.
31	The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period).	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be provided during the reporting period.
32(a)(i)	The approval holder must ensure each compliance report includes: a) accurate and complete details of compliance and any non-compliance with: i) each condition attached to this approval decision, and	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be provided during the reporting period.
32(a)(ii)	The approval holder must ensure each compliance report includes: a) accurate and complete details of compliance and any non-compliance with: ii) all commitments made in each plan,	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be provided during the reporting period.
32(b)	The approval holder must ensure each compliance report includes: b) a schedule of all plans in effect in relation to these conditions during the ACR period,	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be provided during the reporting period.
32(c)	The approval holder must ensure each compliance report includes: c) accurate and complete details of how each plan was implemented during the ACR period,	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be provided during the reporting period.
32(d)	The approval holder must ensure each compliance report includes: d) if any incident occurred, accurate and complete details of each incident.	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be provided during the reporting period.

33	The approval holder must ensure each compliance report is completed to the satisfaction of the Minister and is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be provided during the reporting period.
34(a)	The approval holder must, within 20 business days following the end of each ACR period, in a format that is easily accessible and downloadable, publish on the website: a) each compliance report, and	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be published during the reporting period.
34(b)	The approval holder must, within 20 business days following the end of each ACR period, in a format that is easily accessible and downloadable, publish on the website: b) a shapefile showing all disposal of dredge, undertaken within the ACR period.	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be published during the reporting period.
35(a)	The approval holder must: a) Exclude or redact sensitive biodiversity data from each compliance report and shapefile published on the website or otherwise provided to a member of the public.	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be published during the reporting period.
35(b)	The approval holder must: b) If sensitive biodiversity data is excluded or redacted from a version of a compliance report published or otherwise provided to a member of the public, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be published during the reporting period.
35(c)	The approval holder must: c) If sensitive biodiversity data is excluded or redacted from a version of a shapefile published or otherwise provided to a member of the public, submit the full shapefile to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be published during the reporting period.
36	The approval holder must notify the department electronically, within 5 business days of each date of publication that the compliance report has been published on the website. In this notification, the approval holder must provide the department with the web address for where the compliance report and related shapefile are published on the website.	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be published during the reporting period.

37	The approval holder must keep each compliance report and related shapefile published on the website from the first date which that compliance report must be published and until the expiry date of this approval.	Not Applicable	This is the first annual report under this approval and as such no report or data was required to be published during the reporting period.
38(a)	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident. The approval holder must specify in each notification: a) any condition or commitment made in a plan which has not been, or may have not been, complied with,	Not Applicable	No incidents relating to disposal activities were identified during the reporting period.
38(b)	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident. The approval holder must specify in each notification: b) a short description of the incident, and	Not Applicable	No incidents relating to disposal activities were identified during the reporting period.
38(c)	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident. The approval holder must specify in each notification: c) the location (if applicable, including co-ordinates), date and time of the incident.	Not Applicable	No incidents relating to disposal activities were identified during the reporting period.
39(a)	The approval holder must provide to the department in writing, within 12 business days of becoming aware of an incident, the details of that incident. The approval holder must specify: a) all corrective measures and investigations which the approval holder has already taken in respect of the incident,	Not Applicable	No incidents relating to disposal activities were identified during the reporting period.
39(b)	The approval holder must provide to the department in writing, within 12 business days of becoming aware of an incident, the details of that incident. The approval holder must specify: b) the potential impacts of the incident,	Not Applicable	No incidents relating to disposal activities were identified during the reporting period.
39(c)	The approval holder must provide to the department in writing, within 12 business days of becoming aware of an incident, the details of that incident. The approval holder must specify: c) the method and timing of any corrective measures that the approval holder proposes to undertake to address the incident, and	Not Applicable	No incidents relating to disposal activities were identified during the reporting period.
39(d)	The approval holder must provide to the department in writing, within 12 business days of becoming aware of an incident, the details of that incident. The approval holder must specify: d) any variation of these conditions or revision of a plan that will be required to prevent recurrence of the incident and/or to address its consequences.	Not Applicable	No incidents relating to disposal activities were identified during the reporting period.

40	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period.	Not applicable	The first audit period finishes on 27 November 2028 and no independent audit was required during the reporting period.
41	The approval holder must submit details of the proposed independent auditor and their qualifications to the department within 10 business days following the end of each audit period.	Not applicable	The first audit period finishes on 27 November 2028 and no independent audit was required during the reporting period.
42	The approval holder must ensure the scope of each independent audit is sufficient to determine the compliance status for each condition of approval, and each commitment made in each plan.	Not applicable	The first audit period finishes on 27 November 2028 and no independent audit was required during the reporting period.
43	The approval holder must ensure the criteria for each independent audit and the undertaking of each independent audit are consistent with the Independent Audit and Audit Report Guidelines.	Not applicable	The first audit period finishes on 27 November 2028 and no independent audit was required during the reporting period.
44	The approval holder must submit an audit report to the department for written agreement from the department within 3 months following the end of each audit period, or as otherwise directed by the Minister in writing.	Not applicable	The first audit period finishes on 27 November 2028 and no independent audit was required during the reporting period.
45	The approval holder must ensure each audit report is completed to the satisfaction of the Minister and is consistent with the Independent Audit and Audit Report Guidelines to the extent that the Independent Audit and Audit Report Guidelines are consistent with these conditions.	Not applicable	The first audit period finishes on 27 November 2028 and no independent audit was required during the reporting period.
46	The approval holder must publish each audit report on the website, in a format that is easily accessible and downloadable, within 10 business days of the date the department agrees to that audit report in writing.	Not applicable	The first audit period finishes on 27 November 2028 and no independent audit was required during the reporting period.
47	The approval holder must notify the department within 5 business days of the date the audit report is published on the website. In this notification, the approval holder must provide the department with the web address for where the audit report is published on the website.	Not applicable	The first audit period finishes on 27 November 2028 and no independent audit was required during the reporting period.
48	The approval holder must keep each audit report published on the website from the first date which that audit report must be published and until the expiry date of this approval.	Not applicable	The first audit period finishes on 27 November 2028 and no independent audit was required during the reporting period.

49	Within 20 business days after the completion of the Action, and, in any event, at least 20 business days prior to the expiry date of this approval, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data. The approval holder must submit any spatial data that comprises completion data as a shapefile.	Not applicable	The expiry of the approval is 24 November 2084.

Appendix 2: DSDMP Compliance Audit Table

Commitment Number	Commitment	Compliance Status	Evidence/Comments
1	Water quality management - Implement the Marine Water Quality Monitoring Program (MWQMP) during disposal operations.	Compliant	A MWQMP was implemented during disposal operations. As previously notified to the DCCEEW by letter dated 16 April 2026, Mardie Minerals implemented the interim Hybrid Marine Water Quality Monitoring Methodology during the early stages of the capital dredging campaign following damage to the telemetered monitoring network caused by Tropical Cyclone Narelle. The hybrid methodology was implemented until such time when the monitoring network was fully reinstated on 22 July 2026.
2	Disposal plume validation - Undertake disposal plume validation/verification monitoring where required.	Compliant	The disposal assessment reviewed 22 events between 24 May and 6 June 2026. Disposal-related turbidity was detected for six events only at ZOHI2, approximately 550 m north-east of DMPA4, during ebb or slack tide conditions. Turbidity returned to background within approximately 2–3 hours, with no attributable response at other monitoring sites and no conclusive PAR reduction. The results indicate a localised, short-duration near-seabed plume and support the conclusion that the Baird (2024, 2025) disposal modelling assumptions were likely conservative.
3	Protection of BCH - No direct loss of benthic communities and habitats outside the approved disposal footprint.	Compliant	No disposal activities occurred outside of the disposal area which suggests that there would be no direct loss of BCH. The post-disposal Benthic Communities and Habitat (BCH) survey is scheduled to be undertaken by our consultant, O2 Marine, during October/November 2026 in accordance with the commitments contained within the approved DSDMP. Accordingly, the results of the BCH survey will not be available at the time this annual report is submitted and will be provided at a future date once finalised.

4	BCH monitoring - Implement the Benthic Habitat Monitoring Program for disposal-related impact assessment.	Compliant	The Benthic Habitat Monitoring Program was implemented during the reporting period. The post-disposal Benthic Communities and Habitat (BCH) survey is scheduled to be undertaken by our consultant, O2 Marine, during October/November 2026 in accordance with the commitments contained within the approved DSDMP. Accordingly, the results of the BCH survey will not be available at the time this annual report is submitted and will be provided at a future date once finalised.
5	Marine fauna management - Implement marine fauna observation, exclusion zones and shutdown procedures during disposal operations.	Compliant	Marine fauna observer logs record of all marine fauna sightings recorded during the completion of disposal activities. Records show that observation and exclusion zones were implemented and any marine fauna observed within the exclusion zone resulted in the required management actions being undertaken.
6	Artificial light management - Implement the Project Illumination Plan to minimise impacts to marine fauna.	Compliant.	Artificial lighting is managed in accordance with the approved Illumination Plan (under Approval Decisions EPBC 2018/8236 & 2022/9169) to minimise impacts on marine fauna. Compliance obligations were incorporated into contractor requirements, project inductions, pre-start briefings and operational procedures, and implementation was overseen by project and environmental personnel.
7	Hydrocarbon management - Implement SOPEP, bunkering and chemical handling procedures.	Compliant.	See Condition 9 in the EPBC 2024/10054 audit table
8	Spill reporting - Immediate notification and investigation of any hydrocarbon spill.	Not applicable.	No hydrocarbon spills were recorded during the reporting period.
9	Waste management - No unauthorised discharge of waste to the marine environment.	Compliant	There were no reportable unauthorised discharges of waste to the marine environment incidents during dumping activities. All waste was disposed at an offsite WA authorised landfill facility.
10	Marine pest management - Comply with Marine Pest Management Procedure, ballast water requirements and Vessel Check process.	Compliant	The Introduced Marine Pest Management Plan was implemented during the reporting period. All requirements of this plan were complied with.

11	Marine fauna records - Maintain records of all marine fauna sightings, exclusions and management actions.	Compliant.	All marine fauna sightings recorded during the completion of disposal activities have been maintained.
12	Completion reporting - Prepare Marine Fauna Completion Report and Final Marine Water Quality Monitoring Report.	Not Applicable	These reports are to be completed within 12 months following completion of dredging and are yet to be completed. The reports will be provided with the next annual report.