

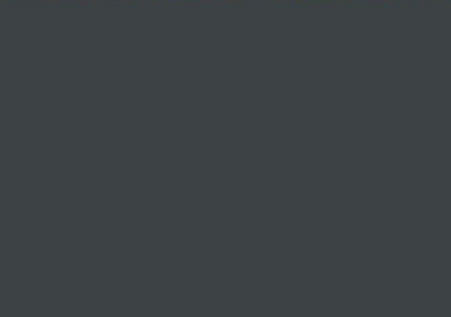
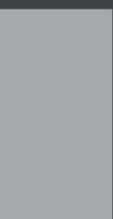
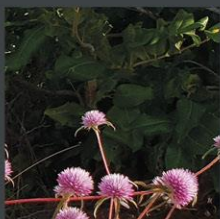
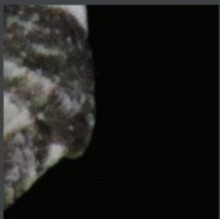
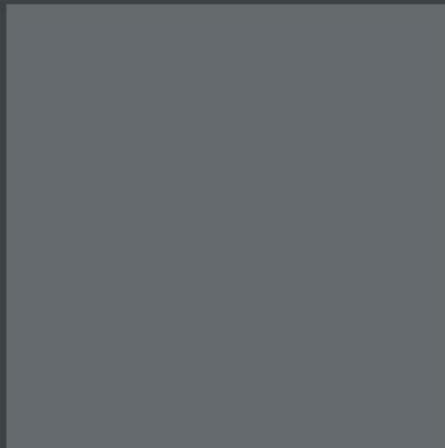


GROOTE EYLANDT MINING COMPANY (GEMCO)

EASTERN LEASES PROJECT (EPBC 2014/7228)

# BIODIVERSITY OFFSETS RECONCILIATION REPORT

(17th June 2022 to 17th June 2024)





## DOCUMENT CONTROL

### OWNER OF THIS REPORT:

NAME	TITLE	COMPANY
Mike Smith	Technical Services Manager	GEMCO

### AUTHORS:

NAME	TITLE	COMPANY
Rohan Wilson	Principal Biodiversity Offsets	GEMCO

### VERSION HISTORY:

VERSION	DESCRIPTION OF CHANGES	DATE
Ver#1	N/A	20/08/2024
Ver#2 (Final)	Section 2.4 additional text	22/08/2024

### PERSONS INVOLVED IN THE REVIEW OF THIS PLAN INCLUDE:

NAME	TITLE	COMPANY
Mike Chapman	Project Studies & Approvals Manager	GEMCO

### PERSONS AUTHORISING THIS PLAN:

NAME	TITLE	SIGNATURE	DATE
Steven Hedges	VP Operations GEMCO	<i>Steven Hedges</i>	22/8/24

## COVER PAGE AND DECLARATION OF ACCURACY

<b>EPBC NUMBER</b>	EPBC 2014/7228
<b>PROJECT NAME</b>	Eastern Leases Project
<b>PROPONENT/APPROVAL HOLDER AND ACN OR ABN</b>	Groote Eylandt Mining Company Pty Ltd (GEMCO) ABN: 26 004 618 491
<b>THE APPROVED ACTION</b>	Developing an open cut mine in the Eastern Leases (ML31219 and ML31220) and linking the Eastern Leases to the existing GEMCO Mine via new haul roads on Access Authority AA31711
<b>LOCATION OF THE ACTION</b>	Groote Eylandt, Northern Territory
<b>DATE OF PREPARATION OF THE BIODIVERSITY OFFSETS RECONCILIATION REPORT</b>	20/08/2024
<b>PERSON ACCEPTING RESPONSIBILITY FOR THIS REPORT</b>	Steven Hedges, VP Operations GEMCO

I declare that:

1. To the best of my knowledge, all the information contained in, or accompanying this biodiversity offsets reconciliation report is complete, current and correct.
2. I am duly authorised to sign this declaration on behalf of the approval holder.
3. I am aware that Section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the *Environment Protection and Biodiversity Conservation Regulations 2000* (Cth). The offence is punishable on conviction by imprisonment or a fine, or both.

Signed



Full name (please print)

Steven John Hedges

Organisation (please print)

Groote Eylandt Mining Company Pty Ltd

Date

22 / 8 / 24.

## **ACKNOWLEDGEMENT**

We acknowledge the Anindilyakwa people, the Traditional Owners of Groote Eylandt where GEMCO operates, and the Indigenous and Tribal Peoples of the lands on which South32 is located and where we conduct our business around the world.

We respect and acknowledge the unique cultural and spiritual relationships that Indigenous and Tribal Peoples have to the land, waters and seas, and their rich contribution to society.

In the spirit of respect and reconciliation, we will continue to support initiatives that strengthen culture and ways of life to ensure their legacy continues and extends to future generations.

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## GLOSSARY

<b>Term/Abbreviation</b>	<b>Description</b>
ALC	The Anindilyakwa Land Council. This is the land council responsible for Groote Eylandt
ALC Rangers	Anindilyakwa Land Council Land & Sea Rangers. This is the Ranger group
BOMP	Biodiversity Offsets Management Plan for the Eastern Leases project
BOS	Biodiversity Offsets Strategy for the Eastern Leases project
Darwin CPI	Darwin Consumer Price Index
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
DEPWS	Northern Territory Department of Environment, Parks and Water Security
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>
Foundation Period	The first two years of the biodiversity offsets program being the 17 <sup>th</sup> June 2022 until 17 <sup>th</sup> June 2024. This first Impact Reconciliation Report covers this period
GEMCO	Groote Eylandt Mining Company Pty Ltd
High Priority Weeds	The eleven weed species that are the focus of offsets management in the BOMP.
Offset management area	The area of Groote Eylandt beyond the GEMCO weed management area. Offsets programs will be undertaken within this area
Reporting Period	The period of time that the Impact Reconciliation Report accounts for. In the case of this first report, the reporting period is synonymous with the 'Foundation Period', 17 <sup>th</sup> June 2022 – 17 <sup>th</sup> June 2024.

# 1 INTRODUCTION

## 1.1 BACKGROUND

The Groote Eylandt Mining Company Pty Ltd (GEMCO) has approval under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) to develop the Eastern Leases Project (the project), an extension to GEMCO's existing manganese mine on Groote Eylandt. EPBC Act approval (EPBC 2014/7228) permits the clearing of 1,525 ha of native vegetation for the project. Clearing is subject to the provision of biodiversity offsets, with the financial value of the offsets being based on the number of hectares cleared for the project. The EPBC Act approval requires GEMCO to submit an offsets reconciliation report every two years describing:

- The extent of clearing undertaken for the project during the preceding two years (i.e. during the "reporting period");
- The value of the offset funds required to be provided as a result of this clearing;
- The way in which the offset funds were spent during the reporting period (i.e. activities undertaken and targets achieved); and
- The offset programs proposed to be undertaken in the next two years.

These requirements are addressed in this report. This Biodiversity Offsets Reconciliation Report is the first one prepared for the project and is for a reporting period from 17th June 2022 until 17th June 2024. The report is structured as follows:

- Section 1 – Provides a brief overview of the Eastern Leases Project, the biodiversity offsets program, contextual information relevant to the report and a summary of the requirements for the reconciliation report, including cross references to where these requirements have been addressed.
- Section 2 – Provides an account of the number of hectares cleared and the value of the offset funds generated in the reporting period.
- Section 3 – Describes the offsets activities that were undertaken during the reporting period and the targets achieved.
- Section 4 – Provides a forward two-year work program for June 2024 to June 2026.
- Section 5 – Considers adaptive management in relation to the offsets program, and whether any adjustments to the program are required.

## 1.2 EASTERN LEASES PROJECT

Groote Eylandt is Australia's third largest island, with a land area of approximately 2,285 km<sup>2</sup>, and is largely undeveloped. GEMCO's existing manganese mine is the main development on the island. There are three townships on Groote Eylandt, namely Alyangula, Angurugu and Umbakumba, as well as several smaller satellite communities (Figure 1). Groote Eylandt is Aboriginal land under the *Aboriginal Land Rights (Northern Territory) Act 1976* (Cth) (ALRA). The Anindilyakwa Land Council (ALC) is responsible for managing this Aboriginal land.

GEMCO has been operating a manganese mine on Groote Eylandt since the 1960s. Its operations include mining manganese ore by open cut mining methods, and then processing the ore in a concentrator to produce washed ore. The washed ore is transported from the mine by road train to GEMCO's port facility at Milner Bay, where it is loaded onto ships.

The Eastern Leases is an additional mining area, to the east of the existing GEMCO mine. The Eastern Leases consists of two mining tenements (ML31219 "Northern Eastern Lease" and ML31220 "Southern Eastern Lease"), and an Access Authority (AA31711 "Access Authority") that connects the mining tenements to GEMCO's existing operations (Figure 1). The Eastern Leases Project commenced on 17<sup>th</sup> June 2022, when clearing for the development of project infrastructure commenced.

## 1.3 BIODIVERSITY OFFSETS

The EPBC Act approval for the project requires GEMCO to provide offsets by funding conservation programs. As per Condition 13(a)(i) of the EPBC Act approval, the value of the funding is based on the number of hectares cleared, specifically \$4,500 is to be spent on offsets for each hectare cleared as part of the project, with a requirement for this rate to increase in accordance with the Darwin Consumer Price Index (Darwin CPI).

The conservation programs are required to benefit the threatened species predicted to be impacted by the project. Condition 11 of the EPBC Act approval requires a Biodiversity Offset Strategy (BOS) to be approved prior to mining activities, and Condition 12 requires a Biodiversity Offset Management Plan (BOMP) to be approved within two years of the commencement of mining activities. The purpose of the BOS is to evaluate the suitability of a suite of conservation actions that could benefit the impacted species and, following this evaluation, describe the strategy to be adopted for providing offsets. The purpose of the BOMP is to describe in detail how the offset strategy in the approved BOS would be implemented, including specific targets and timeframes.

The BOS was approved by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) on 6<sup>th</sup> July 2021 and identified weed management as being the most suitable offsets program for the project. The BOMP was approved on 29<sup>th</sup> April 2024 and identifies the 'high priority' weed species that are the target of the offsets program (BOMP Section 5.3), a set of management actions that must be completed as part of the program (BOMP Section 6, summarised in Table 1), a set of targets with associated timeframes (BOMP Section 6, summarised in Table 2), and a mechanism for monitoring, reporting, and adaptive management of the offsets program (BOMP Section 7). This Impact Reconciliation Report addresses the reporting requirements of the BOMP.

The BOMP divides the biodiversity offsets program into three time periods:

- Foundation Period (first 2 years) i.e. June 2022 – June 2024
- Short-term Period (2-5 years) i.e. June 2024 – June 2027
- Medium-term Period (5-10 years) i.e. June 2027 – June 2032

Each management action outlined in the BOMP has specified targets to be completed by the end of each time period (BOMP Section 6, Table 2).

The BOMP stipulates that although offset funds are generated at the moment of clearing native vegetation, the timing of the spending of those funds must be determined by the BOMP management actions timeframe. Consequently, there will be some years where more offset funds are generated than are spent, and some



years where more offset funds are spent than are generated. In the Foundation Period, for example, which this Impact Reconciliation Report covers, there is a significant amount of vegetation clearing needed for the construction phase of the mining activities, but a proportionally lower amount of offset funding required to be spent, given that the primary focus of the Foundation Period is establishing an approved BOMP as well as the necessary agreements between GEMCO, the ALC and other stakeholders to implement the offsets program.

## 1.4 CONTEXT FOR THE REPORTING PERIOD

This report covers the 'Foundation Period' of the offsets program, which is the first two years from the commencement of the Eastern Leases Project (17<sup>th</sup> June 2022 until 17<sup>th</sup> June 2024). The focus of the Foundation Period is to establish an approved, detailed management plan for the offsets program in consultation with the ALC and the Northern Territory Government, and to establish the necessary systems to start implementing the offsets program. The BOMP contains a detailed account of the offset actions to be undertaken during the Foundation Period and the outcomes to be achieved, including specific targets for each outcome.

This is the first Impact Reconciliation Report, and it therefore heavily references the BOMP for offset actions and targets, and therefore should be read in conjunction with the BOMP. Future Impact Reconciliation Reports will also reference previous reconciliation reports for this information, specifically the two-year forward work plan.

In preparing this Impact Reconciliation Report, it is considered relevant to also report that on 16-17 March Tropical Cyclone Megan, a category 2 storm crossed the south-east coast of Groote Eylandt. The cyclone brought strong winds, heavy rains and more than 680 mm of rain in 48 hours causing significant damage to infrastructure and vegetation across the island. Several roads, bridges, and critical infrastructure used for transporting goods and material supplies to the island were severely damaged. Some critical infrastructure on the island, including the port, is still out of commission.

The biodiversity offset program was temporarily suspended for several weeks as GEMCO re-focused its resources towards urgent repair works caused by the cyclone. Despite this delay, GEMCO managed to complete all weed spraying activities safely and before the end of the reporting period. The recruitment of a dedicated Plant Biosecurity Officer's position within the ALC Land and Sea unit was the only action that was delayed, but this post is expected to be filled before the end of 2024.

## 1.5 REQUIREMENTS FOR THE RECONCILIATION REPORT

GEMCO is required to prepare and submit an Impact Reconciliation Report to DCCEEW every second year under Condition 13 of the EPBC Act approval. As required in Condition 13(b) of the EPBC Act approval, the first report is to be submitted by 31st August 2024 (this report), and subsequent reports must be submitted by 30th March every two years.

Table 1 outlines the specific requirements of this Impact Reconciliation Report, which are derived from the EPBC Act approval as well as the BOMP. It also includes cross references indicating where these requirements have been addressed in the Impact Reconciliation Report.

**TABLE 1 REQUIREMENTS OF THE EPBC ACT APPROVAL AND BOMP TO BE ADDRESSED IN THIS REPORT**

Requirement	Document Sections
<b>EPBC Act Approval (EPBC 2014/7228)</b>	
Condition 13b <i>"Each impact reconciliation report must account for:            work completed and outcomes achieved in the two preceding calendar years            against the agreed work program; and            the work program for the subsequent two (2) year period."</i>	Section 3  Section 4
Condition 13c: <i>"The impact reconciliation report shall:            Require the approval holder to submit spatial data identifying the areas of native            vegetation cleared during the previous two years to 30<sup>th</sup> March; and            include the methodology for calculating the monies required to be expended on            programs and/or actions pursuant to the requirements of this approval."</i>	Appendix 1 (spatial data)  Section 2
Condition 13b: <i>"The first impact reconciliation report will be due by 31<sup>st</sup> August in the second            year following the commencement of the action."</i>	This report was submitted prior to 31 <sup>st</sup> August 2024
<b>Biodiversity Offsets Management Plan</b>	
The impact reconciliation report will contain the following information: <i>"<b>Native vegetation cleared in the Eastern Leases.</b> The report will confirm the            number of hectares of native vegetation cleared in the Eastern Leases during the            reporting period. Spatial data of the vegetation clearing will be supplied along            with the reconciliation report."</i>	Section 2.1, and Appendix 1 (spatial data)
The impact reconciliation report will contain the following information: <i>"<b>Offset monies generated by native vegetation clearing in the Eastern            Leases.</b> The report will confirm the value of offsets funding required as a result            of native vegetation clearing and will describe the methodology used for            calculating the generated offset monies"</i>	Section 2.3
The impact reconciliation report will contain the following information: <i>"<b>Offset works completed and the outcomes achieved.</b> This information will            be provided for the reporting period (typically the preceding two years) and will            be generated by the annual planning process."</i>	Section 3
The impact reconciliation report will contain the following information: <i>"<b>A work program for the subsequent two year period.</b> This information will            be derived from the annual planning process. Proposed work programs will            outline weed management works required to meet the targets for individual            weed species and the overall outcomes for the offsets program."</i>	Section 4

## 2 RECONCILIATION OF CLEARING, OFFSET FUNDS AND OFFSET PROGRAMS

### 2.1 CLEARING ACTIVITIES

Clearing for mining operations in the Eastern Leases commenced on the 17<sup>th</sup> June 2022, with the construction of the haul road corridor. A total of 190 ha of native vegetation was cleared during the reporting period, including clearing for the development of infrastructure such as the haul road, as well as for exploratory drilling that was undertaken in areas that will be mined in future years.

Clearing operations were confined to the dry seasons of 2022 and 2023 and no clearing has been undertaken in the reporting period since the September 2023 quarter. Figures 2 and 3 show the geographical extent of clearing in the reporting period, and Table 2 shows the total amount of clearing completed in each quarter.

### 2.2 CALCULATION OF BIODIVERSITY OFFSET FUNDS

The EPBC Act approval stipulates that offset funds be calculated based on the number of hectares of native vegetation cleared in the Eastern Leases, with up to 1,525 ha of native vegetation permitted to be cleared. The EPBC Act approval sets the value of the biodiversity offset funds at \$4,500 AUD (excluding GST) per hectare of native vegetation cleared, with this value to be adjusted for inflation based on the Darwin CPI.

At the time of the EPBC Act approval (June 2016), the Darwin CPI was 108.3 points. The formula below was used to calculate the value to be applied to clearing.

$$\frac{\text{Darwin CPI (quarter in which clearing occurred)}}{\text{Darwin CPI (baseline:Q2 2016)}} \times \$4,500 = \text{Offset Funds per Hectare}$$

The example below shows the calculation for the June 2022 quarter (the Darwin CPI was 123.2 in this quarter).

$$\frac{123.2}{108.3} \times \$4,500 = \mathbf{\$5,119/ha}$$

### 2.3 BIODIVERSITY OFFSET FUNDS GENERATED IN THE REPORTING PERIOD

The total value of the biodiversity offset funds generated in the reporting period is \$1,013,007. A detailed breakdown of these funds is provided in Table 2, which shows the hectares cleared, the Darwin CPI at the time of clearing, the CPI adjusted offset funds per hectare and the total offset funds per quarter.

**TABLE 2 AREA OF NATIVE VEGETATION CLEARED AND BIODIVERSITY OFFSET FUNDS GENERATED DURING THE REPORTING PERIOD**

<b>Quarter</b>	<b>Darwin CPI</b>	<b>Offset Funds per hectare</b>	<b>Hectares cleared</b>	<b>Offset Funds generated</b>
June 2016	108.3	\$4,500.00	N/A – For reference only	
June 2022	123.2	\$5,119.11	34.93	\$178,811
September 2022	125.5	\$5,214.68	15.17	\$79,107
December 2022	126.6	\$5,260.39	1.37	\$7,207
March 2023	128.2	\$5,326.87	0	\$0
June 2023	129.7	\$5,389.20	89.20	\$480,716
September 2023	130.9	\$5,439.06	49.12	\$267,167
December 2023	131.5	\$5,463.99	0	\$0
March 2024	132.4	\$5,501.39	0	\$0
June 2024	133.6	\$5,551.25	0	\$0
<b>TOTAL</b>			<b>189.79</b>	<b>\$1,013,007</b>

## 2.4 OFFSET FUNDS SPENT DURING THE REPORTING PERIOD

A total of \$365,007 was spent on biodiversity offset programs during the reporting period.

Two major bodies of work were completed using biodiversity offset funds. They included:

1. A large-scale island-wide weed survey, conducted by qualified botanists (consultants) with experience in the identification of transforming weeds in the Northern Territory and on Groote Eylandt. Field surveys were undertaken by botanists from Cumberland Ecology over three separate occasions in 2023. This body of work was described in Sections 5 and 6.4 of the BOMP. This work is crucial to understanding the present weed situation on Groote Eylandt because it provided a baseline status of the distribution, density and type of transforming weeds, allowing GEMCO the ability to adequately plan, prioritise and strategically manage high priority weeds meeting the objectives of the BOS.
2. A six-week weed treatment program undertaken between April and May 2024. This was the first major weed control work of the offset program. It strategically targeted infestations of high priority weeds that were mapped during the island-wide weed survey.

Offset funds spent on those bodies of work are show in Table 3 below.



**TABLE 3 BIODIVERSITY OFFSET FUNDS SPENT DURING THE REPORTING PERIOD**

<b>Date</b>	<b>Project</b>	<b>Activity or Goods</b>	<b>Monies Spent</b>
May 2023	Island-wide weed survey	First Weed Survey	\$20,900.00
Jun 2023	Island-wide weed survey	First Weed Survey	\$16,565.00
Jul 2023	Island-wide weed survey	Second Weed Survey	\$71,325.00
Aug 2023	Island-wide weed survey	Third Weed Survey	\$37,020.00
Apr-June 2023	Island-wide weed survey	Travel and Accommodation	\$9,166.00
Sept 2023	Island-wide weed survey	Mapping, Analysis, Literature Review	\$18,960.00
Oct 2023	Island-wide weed survey	Drafting Weed Management Plan	\$5,230.00
Nov 2023	Island-wide weed survey	Drafting Weed Management Plan	\$8,930.00
	<b>Island-wide weed survey</b>		<b>\$188,096.00</b>
Mar 2024	Weed Treatment 2024	Chemical Supplies	\$6,392.00
Apr 2024	Weed Treatment 2024	Repairs	\$510.00
May 2024	Weed Treatment 2024	Vehicle Hire	\$9,296.00
May 2024	Weed Treatment 2024	Freight	\$1,632.00
May 2024	Weed Treatment 2024	Contract Labour	\$147,060.00
Apr-May	Weed Treatment 2024	Travel and Accommodation	\$12,021.00
	<b>Weed Treatment 2024</b>		<b>\$176,911.00</b>
<b>TOTAL SPENT</b>			<b>\$365,007.00</b>

The forecast biodiversity offset monies to be spent during the Short-term Period (June 2024 to June 2027) and Medium-term Periods (June 2027 to June 2032) is likely to be higher than what was spent during the Foundation Period. This is due primarily because of:

- The progressive ramping up of the major offset activities summarised in Section 4.2 of this report and described in detail in Section 6 of the BOMP, specifically:
  - the planned employment of a full-time Biosecurity Officer (Weed Management) that will sit within the ALC Land & Sea Rangers organisational structure;
  - the development and implementation of structured weed management training modules that are tailored specifically for the needs of the Traditional Owners;
  - The execution of a larger and ongoing weed treatment program across the island; and
  - The implementation of a community awareness program

It should also be noted that whilst mining in the Eastern Leases is currently scheduled to be completed around June 2028, offset funds will continue to be made available to key activities beyond the closure of the Eastern Leases (consistent with the BOMP and approved total disturbance footprint).

# 3 BOMP OUTCOMES ACHIEVED

## 3.1 INTRODUCTION

Each management action described in the BOMP has a series of targets associated with it, with the targets to be achieved by the end of each time period (summarised in BOMP Section 6, Table 2). This Impact Reconciliation Report covers the entirety of the Foundation Period, and therefore reports on the management action targets for the end of the Foundation Period. Table 4 provides the management action targets from the BOMP and describes progress made towards meeting these targets.

As indicated in Table 4, all targets have been met, with the exception of two targets which have been subject to a slight delay (refer discussion below). As noted in Section 1.4, much of the offset work for the Foundation Period had already been completed at the time that the BOMP was finalised in April 2024 and so Table 4 cross references the BOMP for a further description of the offset work undertaken in the Foundation Period.

The two targets which have been delayed are as follows:

- The recruitment of the Plant Biosecurity Officer role has been delayed because of disruptions in early 2024 associated with Cyclone Megan. This role will be filled in Q4 2024.
- A single infestation of Para Grass could not be accessed for treatment during the 2024 weed treatment program due to cultural reasons (i.e. Sorry Business). The BOMP anticipates that there may be instances where it is not possible to undertake the on-ground weed management work as scheduled and notes that the weed management targets are subject to the ability to access areas in a safe and culturally appropriate way. Given that it was not possible to access this infestation for cultural reasons, the infestation will be treated as part of the 2025 weed treatment program.

## 3.2 TABLE OF BOMP TARGETS

**TABLE 4 FOUNDATION PERIOD TARGETS FROM THE BOMP AND THEIR STATUS AT THE END OF THE REPORTING PERIOD**

Biodiversity Offset Management Targets	Foundation Period Targets	Reporting Status
<b>Island-wide Weed Mapping Survey</b>	Undertake baseline island-wide weed mapping survey	<p>Complete. The baseline island-wide weed mapping survey was completed as three separate surveys undertaken by appropriately qualified botanists between April and June 2023. The surveys aimed to map all weed species across all accessible parts of Groote Eylandt likely to have weed infestations. The data from the surveys informed strategic prioritisation of the weed treatment program. The results of these surveys have been incorporated into the BOMP actions and targets.</p> <p>Further detail, including a description of the methodology and results, including maps of weeds, is provided in Section 5 of the BOMP.</p>
<b>Audit of Existing Weed Management Systems</b>	Undertake audit of existing weed management systems and recommend improvements	<p>Complete. This audit was undertaken by qualified consultants and involved desktop studies, visits to Groote Eylandt to inspect facilities and consultation with weed managers and practitioners, as well as inspections of freight transfer and port facilities in Darwin. The results of the audit were incorporated into the BOMP actions and targets. It should be noted that GEMCO proactively started these targets immediately prior to the start of the Foundation Period, spending \$112,120 to do so, but has considered this to be in-kind contribution, and has not deducted this amount from the offset funds.</p> <p>Further detail is provided in Section 6.3 of the BOMP.</p>
<b>Weed Management Plan</b>	Prepare a draft Weed Management Plan in consultation with the ALC	<p>Complete. A draft Weed Management Plan has been prepared using the results of the island-wide weed survey. Finalisation of the Weed Management Plan will be undertaken by the Plant Biosecurity Officer during the short-term period. Further detail on the Weed Management Plan is provided in Section 6.5 of the BOMP.</p>

<b>Biodiversity Offset Management Targets</b>	<b>Foundation Period Targets</b>	<b>Reporting Status</b>
<b>Plant Biosecurity Officer</b>	Plant Biosecurity Officer roles and responsibilities agreed with the ALC	Complete. Agreement has been reached between GEMCO and the ALC on the roles, responsibilities and position description for the Plant Biosecurity Officer. Recruitment is planned to commence in Q3 2024, with the role permanently filled in Q4 2024.  Further detail on the Plant Biosecurity Officer role is provided in Section 6.6 of the BOMP.
	Plant Biosecurity Officer has been recruited	Delayed – to be completed in Q4 2024.
<b>Weed Control and Monitoring Targets - Gamba Grass</b>	Undertake a baseline island-wide survey for Gamba Grass.	Complete. This was completed as part of the series of island-wide weed surveys conducted in 2023.
	Treat 100% of plants in any infestations located during the BOMP weed surveys	Complete. A Gamba Grass infestation was treated immediately upon discovery during the island-wide weed survey in 2023. The infestation site, along with all known sites from the previous 5 years were checked for Gamba Grass recurrence during the 2024 weed treatment program.
<b>Weed Control and Monitoring Targets - Grader Grass</b>	Undertake a baseline island-wide survey for Grader Grass	Complete. This was completed as part of the series of island-wide weed surveys conducted in 2023.
	In the roadside populations (i.e. all populations other than the Angurugu population): treat 100% of plants detected during the BOMP weed surveys	Complete. All records of Grader Grass in the roadside populations were checked and treated during the 2024 weed treatment program
<b>Weed Control and Monitoring Targets - Annual Mission Grass</b>	Undertake a baseline island-wide survey for Annual Mission Grass	Complete. This was completed as part of the series of island-wide weed surveys conducted in 2023.
	Treat 100% of plants that were found in the BOMP weed surveys	Complete. All Annual Mission Grass plants found along the Umbakumba Highway and Emerald River/Yenbakwa Road were treated during the 2024 weed treatment program.



<b>Biodiversity Offset Management Targets</b>	<b>Foundation Period Targets</b>	<b>Reporting Status</b>
	along Umbakumba Highway and Emerald River/Yenbakwa Road	
<b>Weed Control and Monitoring Targets - Perennial Mission Grass</b>	Undertake a baseline island-wide survey for Perennial Mission Grass	Complete. This was completed as part of the series of island-wide weed surveys conducted in 2023.
	Treat 100% of plants in any infestations located during the BOMP weed surveys	Complete. All records of Perennial Mission Grass in the offset area were checked and treated during the 2024 weed treatment program.
<b>Weed Control and Monitoring Targets - Guinea Grass</b>	Undertake a baseline island-wide survey for Guinea Grass	Complete. This was completed as part of the series of island-wide weed surveys conducted in 2023.
	Treat 100% of plants in the populations outside of the three townships that were found in the BOMP weed surveys	Complete. All Guinea Grass plants in the populations outside of the three townships were checked and treated during the 2024 weed treatment program.
<b>Weed Control and Monitoring Targets - Para Grass</b>	Undertake a baseline island-wide survey for Para Grass	Complete. This was completed as part of the series of island-wide weed surveys conducted in 2023.
	Treat 100% of plants in any infestations located during the BOMP weed surveys	Delayed – to be completed in 2025.  All records of Para Grass were checked and treated during the 2024 weed treatment program with the exception of one infestation on the Angurugu River, which could not be accessed during the time of the treatment program due to cultural reasons. The BOMP specifies that weed management targets are subject to the ability to access areas in a safe and culturally appropriate way. This infestation will be treated as part of the 2025 weed treatment program.
<b>Weed Control and Monitoring Targets - Buffel Grass</b>	Undertake a baseline island-wide survey for Buffel Grass	Complete. This was completed as part of the series of island-wide weed surveys conducted in 2023.

Biodiversity Offset Management Targets	Foundation Period Targets	Reporting Status
	Treat 100% of plants in any infestations located during the BOMP weed surveys	Complete. All plants in the infestations located during the BOMP weed surveys were checked and treated during the 2024 weed treatment program.
<b>Weed Control and Monitoring Targets - Fountain Grass, Olive Hymenachne, Thatch Grass, Molasses Grass</b>	Undertake a baseline island-wide survey for Fountain Grass, Olive Hymenachne, Thatch Grass, Molasses Grass	Complete. This was completed as part of the series of island-wide weed surveys conducted in 2023. No infestations were found of any of these species. Weed management contractors were also instructed to actively search for these species during the 2024 weed control program. No infestations were found on the island.
<b>Trigger Action Response Plan</b>	TARP Framework developed	Complete. The TARP framework was developed as part of the BOMP.  Further detail is provided in Section 6.9 of the BOMP.

# 4 TWO-YEAR FORWARD WORK PLAN (JUNE 2024 – JUNE 2026)

## 4.1 INTRODUCTION

The two-year forward work plan, presented in Table 5, has been developed in consultation with the Anindilyakwa Land and Sea Manager and the Anindilyakwa Indigenous Protected Area Coordinator, with consultation occurring both during the design and creation of the BOMP, and during the development of this Impact Reconciliation Report.

According to the BOMP timeframes (Section 3.4 of the BOMP), the forward work plan presented below represents the first two years of the Short-term Period, (the Short-term Period runs from 17 June 2024 to 16 June 2027). The actions proposed for the forward work plan in Table 5 have been designed to ensure that the work undertaken is aligned to the work plan put forward in the BOMP, and will ensure that the targets for the Short-term Period will be met by the end of the Short-term Period (i.e. by 16 June 2027).

The BOMP provides detailed targets and actions, and hence the forward work plan in Table 5 cross references the relevant sections of the BOMP that detail those offset actions.

## 4.2 TABLE OF TWO-YEAR FORWARD WORK PLAN

**TABLE 5 TWO-YEAR FORWARD WORK PLAN**

BOMP Section	Offset Management Action	BOMP Year 3 (June 2024 - June 2025)				BOMP Year 4 (June 2025 - June 2026)			
		June 17th - September 2024	December Quarter 2024	March Quarter 2025	June Quarter 2025	September Quarter 2025	December Quarter 2025	March Quarter 2026	June Quarter 2026 <sup>1</sup>
<b>Weed Mapping</b>									
5 & 6.4	Undertake island-wide weed mapping survey				Undertake island-wide weed mapping survey				
<b>Weed Management Plan</b>									
6.5	Prepare and finalise Weed Management Plan for ALC			Finalise Weed Management Plan for ALC					
<b>Plant Biosecurity Coordinator</b>									
6.6.1	Recruit Plant Biosecurity Coordinator	Advertise Role	Recruit Plant Biosecurity Coordinator						

<sup>1</sup> Quarter format is shown to align with Darwin CPI quarters.



BOMP Section	Offset Management Action	BOMP Year 3 (June 2024 - June 2025)				BOMP Year 4 (June 2025 - June 2026)				
		June 17th - September 2024	December Quarter 2024	March Quarter 2025	June Quarter 2025	September Quarter 2025	December Quarter 2025	March Quarter 2026	June Quarter 2026 <sup>1</sup>	
6.6.3	Employ Plant Biosecurity Coordinator		Employ Plant Biosecurity Coordinator							
<b>Weed Control and Monitoring</b>										
6.7	Weed spraying and mapping, follow up monitoring		Planning for following control season. Develop scope of works and contract agreements	First round of weed treatment and monitoring	Second and third rounds of weed treatment and monitoring	Closure report from weed treatment season	Planning for following control season. Develop scope of works and contractor quotes	First round of weed treatment and monitoring	Second and third rounds of weed treatment and monitoring	
<b>Quarantine System</b>										
6.8.1	Undertake detailed audit of quarantine system				Audit current quarantine systems and create plan for improvements, specifically for high priority weeds					
6.8.2	Quarantine inspections (freight, vehicles, etc)	Ongoing quarantine inspections (freight, vehicles, etc)								

BOMP Section	Offset Management Action	BOMP Year 3 (June 2024 - June 2025)				BOMP Year 4 (June 2025 - June 2026)			
		June 17th - September 2024	December Quarter 2024	March Quarter 2025	June Quarter 2025	September Quarter 2025	December Quarter 2025	March Quarter 2026	June Quarter 2026 <sup>1</sup>
6.8.2	Develop risk profiles of high priority weed species.				Develop risk profiles				

**Trigger Action Response Plan**

6.9	Develop standalone procedure for TARP				Develop standalone procedure for TARP				
6.9	Implement TARP		Implement TARP as presented in BOMP	Implement TARP as presented in BOMP	Implement TARP as presented in BOMP	Implement Standalone TARP			

**Community Awareness in Relation to Weeds**

6.10.3 & 6.10.4	Run awareness sessions and events		Awareness Sessions/event		Awareness Sessions/event		Awareness Sessions/event		Awareness Sessions/event
6.10.5	Create and distribute awareness materials			Create materials	Distribute materials as part of awareness session	Create materials	Distribute materials as part of awareness session	Create materials	Distribute materials as part of awareness session

BOMP Section	Offset Management Action	BOMP Year 3 (June 2024 - June 2025)				BOMP Year 4 (June 2025 - June 2026)			
		June 17th - September 2024	December Quarter 2024	March Quarter 2025	June Quarter 2025	September Quarter 2025	December Quarter 2025	March Quarter 2026	June Quarter 2026 <sup>1</sup>
<b>Training and Capacity Building</b>									
6.11.2	Develop and implement training courses			Develop prospective training courses		Implement training courses		Develop prospective training courses	Implement training courses
<b>Monitoring, Planning and Reporting</b>									
7.3	Undertake annual planning		Annual planning meetings between ALC and GEMCO for 2 year forward work plan			Annual planning meetings between ALC and GEMCO for 2 year forward work plan	Annual planning meetings between ALC and GEMCO for 2 year forward work plan		
7.4	Submit Impact Reconciliation Report							Second Impact Reconciliation Report for period 17th June 2024 to 31st December 2025 submitted	

## 5 ADAPTIVE MANAGEMENT/ADJUSTMENTS TO THE OFFSETS PROGRAM

Section 7.6 of the BOMP outlines the adaptive management framework for the offsets program, and a central part of that framework is the Impact Reconciliation Report. The BOMP notes that:

*“Any adjustments to the offsets program will be addressed via the impact reconciliation report prepared every two years. In the event of adjustments to the work described in the BOMP, the report will describe the changes and confirm that they do not significantly change the outcomes to be achieved”.*

In the case of this first Impact Reconciliation Report, no adjustments to the offsets program are recommended or requested at this time. The management actions described in the BOMP are appropriate to achieve the required outcomes from the offsets program, and the resources required to achieve those outcomes are commensurate with the total offset funds likely to be generated.

## 6 REFERENCES

Eastern Leases Biodiversity Offsets Management Plan (2024). Accessed at: [https://www.south32.net/docs/default-source/operations/gemco/eastern-leases-project-biodiversity-offsets-management-plan---approval-letter.pdf?sfvrsn=c0a7d5dc\\_3](https://www.south32.net/docs/default-source/operations/gemco/eastern-leases-project-biodiversity-offsets-management-plan---approval-letter.pdf?sfvrsn=c0a7d5dc_3)

GEMCO Eastern Leases Biodiversity Offset Strategy (2021). Accessed at: [https://www.south32.net/docs/default-source/operations/gemco/eastern-leases/gemco-eastern-leases-biodiversity-offset-strategy\\_june-2021.pdf?sfvrsn=a0a54747\\_3](https://www.south32.net/docs/default-source/operations/gemco/eastern-leases/gemco-eastern-leases-biodiversity-offset-strategy_june-2021.pdf?sfvrsn=a0a54747_3)

Eastern Leases EPBC Act Approval (EPBC 2014/7228). Accessed at: [https://www.south32.net/docs/default-source/operations/gemco/eastern-leases/eastern-leases-epbc-act-approval-\(epbc-2014-7228\)-\(department-of-the-environment-23-june-2016\).pdf?sfvrsn=690b7c7a\\_3](https://www.south32.net/docs/default-source/operations/gemco/eastern-leases/eastern-leases-epbc-act-approval-(epbc-2014-7228)-(department-of-the-environment-23-june-2016).pdf?sfvrsn=690b7c7a_3)

# FIGURES



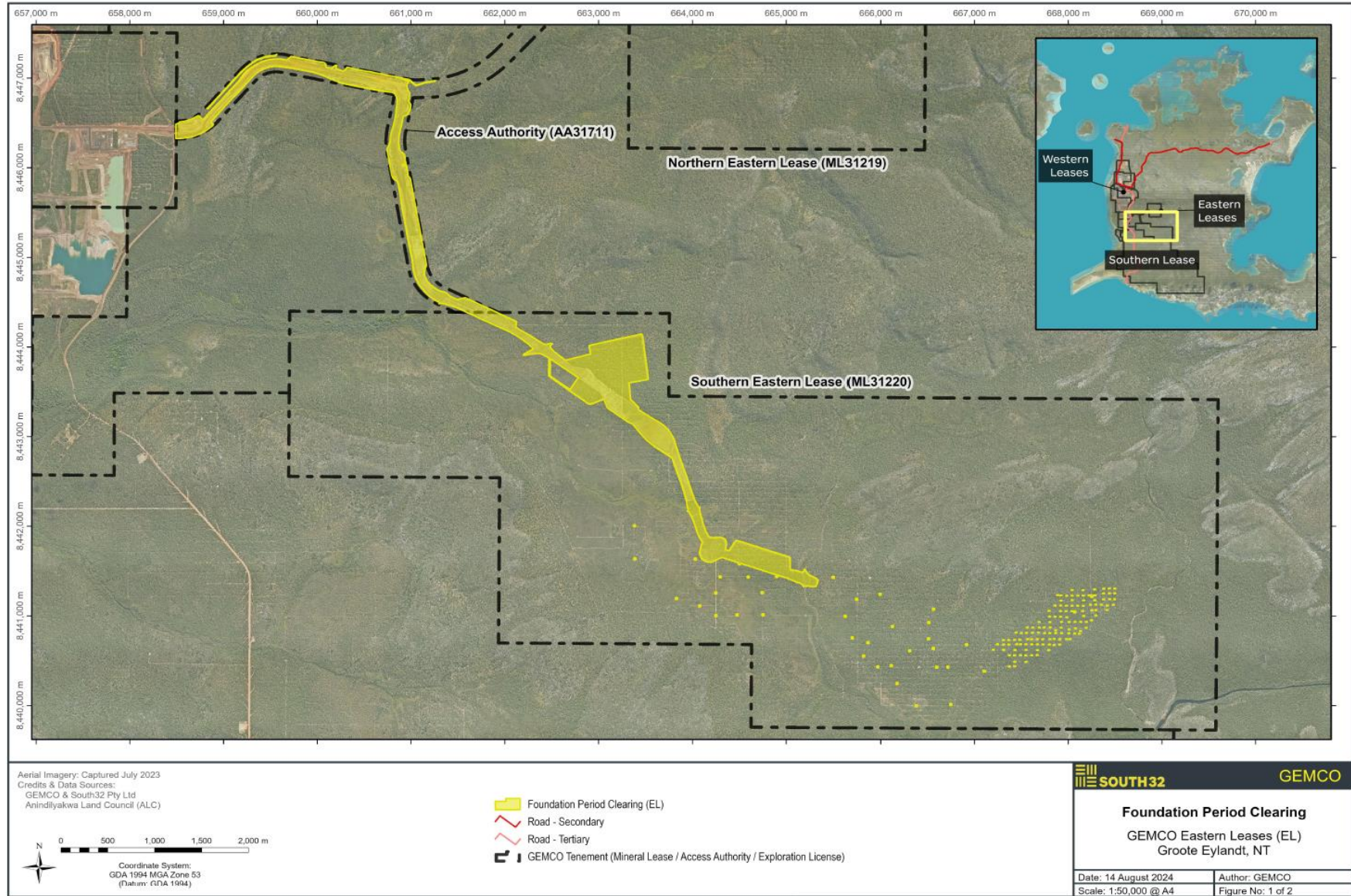


EASTERN LEASES PROJECT

Location Plan

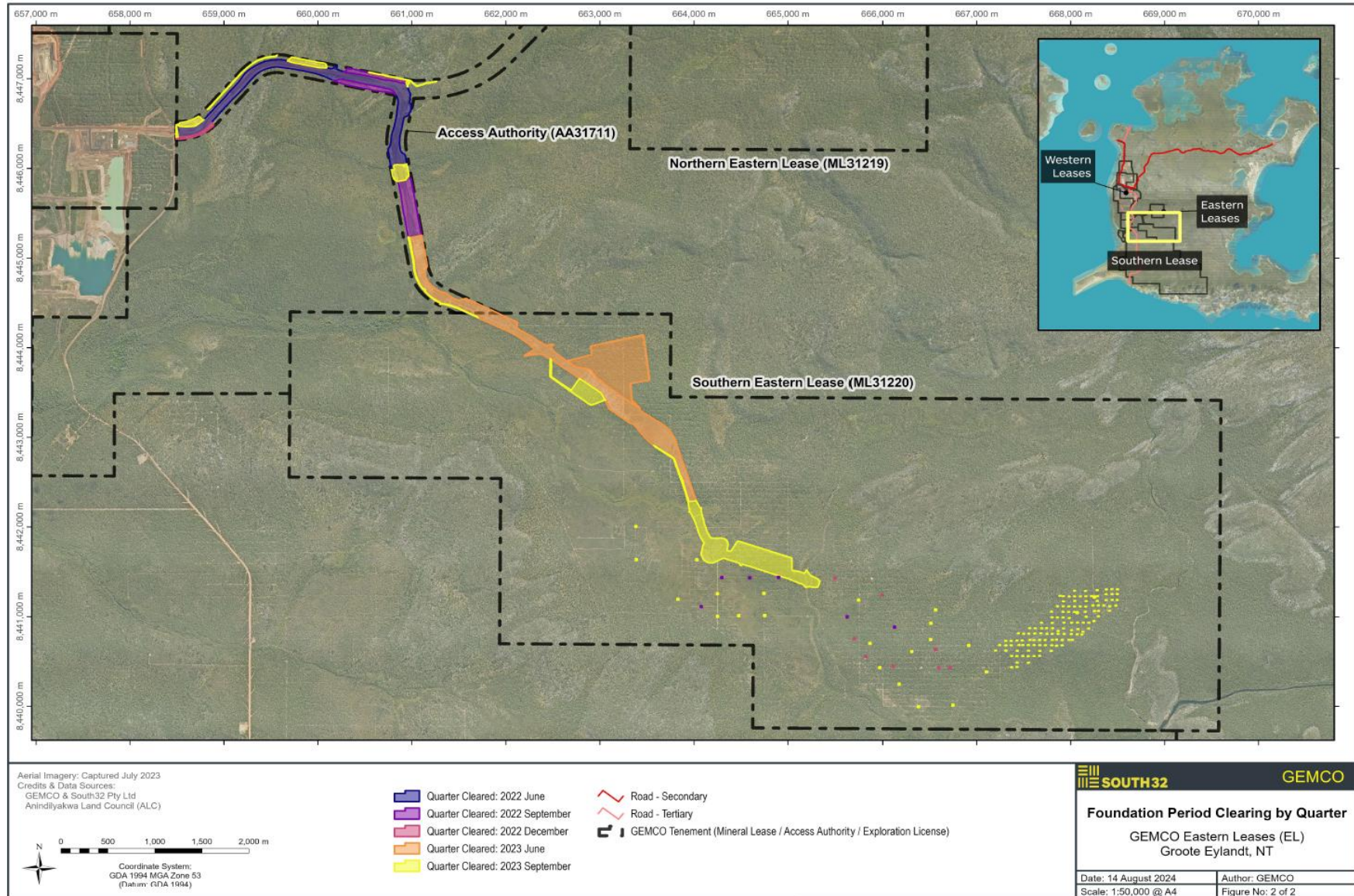
FIGURE 1





**FIGURE 2 TOTAL AREA CLEARED IN THE EASTERN LEASES MINING PROJECT DURING THE REPORTING PERIOD (JUNE 2022 – JUNE 2024).**





**FIGURE 3 CLEARING IN EASTERN LEASES MINING PROJECT BY QUARTER DURING THE REPORTING PERIOD.**