# Knox Creek Plain
# EPBC Approval 2014/7143

# Annual Report 2025

*For the period 1 January 2024 to 31 December 2025*

Prepared for submission to the Department of Climate Change, Environment, Energy and Water
epbcmonitoring@dcceew.gov.au

March 2026

Prepared for and on behalf of

**Kimberley Agricultural Investment Pty Ltd**
ABN 60 154 270 194
PO Box 2531 KUNUNURRA WA 6743

And

**Keep Farming Pty Ltd**
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by

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## Document Control

| Date | Version | Reviewed / endorsed by |
|---|---|---|
| 22 February 2026 | Rev A | For client review |
| 19 March 2026 | Rev O | For submission to DCCEEW |

This report has been prepared in consideration of the EPBC *Annual Compliance Report Guidelines 2023* available at https://www.dcceew.gov.au/sites/default/files/documents/annual-compliance-report-guidelines-2023.pdf

**Cover image**: Knox Creek Plain DCCEEW compliance inspection – 25 June 2025. Photo: D. Pearce.

# Description of activities

| | |
|---|---|
| **EPBC number** | **2014/7143** |
| **Project name** | **Knox Creek Plain Irrigation Development, Western Australia** |
| **Approved action** | To develop and irrigate 12,695 hectares of predominantly black soil alluvial plains into cropped agriculture farmland approximately 35 kilometres north-east of Kununurra, Western Australia. |
| **Project location** | Moonamang Road, Kununurra, WA, 6743 |
| **Reporting period** | 1 January 2025 to 31 December 2025 |
| **Date of report preparation** | February/March 2026 |

**EPBC 2014/7143 KNOX CREEK PLAIN - PROPONENT**

**Registered Business Name**: Kimberley Agricultural Investment Pty Ltd
**ACN**: 154 270 194
**ABN**: 60 154 270 194
**Placed and Date of Incorporation**: Registered by Australian Securities and Investments Commission 15/11/2011.
**Address of Registered Office**: Suite G01, Queens Riverside, 8 Adelaide Terrace, East Perth, WA, 6004.
**Address for notices**: PO Box 2531, Kununurra, WA, 6743.
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**Proponent representatives:**

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**Position**: Chief Executive Officer

**EPBC 2014/7143 KNOX CREEK PLAIN - DEVELOPMENT PARTNER**

**Registered Business Name**: Keep Farming Pty Ltd
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**ABN**: 27 640 171 679
**Address**: PO Box 2123 Kununurra WA 6743

**Contact Person**: Mr Ron Greentree
**Position**: Director
**Email**: rtfarming@bigpond.com
**Mobile**: 0427 255 562

# Acronyms and Abbreviations Used

| | |
|---|---|
| AER | Annual Environment Report |
| AFMP | Aquatic Fauna Management Plan |
| C | Compliant |
| CAR | Compliance Assessment Report |
| CLD | Completed |
| DBCA | Department of Biodiversity, Conservation and Attractions |
| DCCEEW | Department of Climate Change, Environment, Energy and Water |
| DCVA | Deed of Consent, Variation and Acknowledgment |
| DPIRD | Department of Primary Industries and Regional Development |
| DSD | (Former) Department of State Development, now JTSI |
| DWER | Department of Water and Environmental Regulation |
| EMP | Environmental Management Program |
| EPA | Environmental Protection Authority (WA) |
| EPBC | Environment Protection and Biodiversity Conservation (Act 1999) |
| FPDP | Final Project Design Plan |
| GMP | Groundwater Management Plan |
| IRG | Independent Review Group |
| KAI | Kimberley Agricultural Investment Pty Ltd |
| MS938 | Ministerial Statement 939 |
| NC | Non-compliant |
| PER | Public Environment Review |
| PNC | Potentially non-compliant |
| SGDMP | Stormwater and Groundwater Discharge Management Plan |
| WA | Western Australia |

# Table of Contents

**DESCRIPTION OF ACTIVITIES** ..... **3**

**ACRONYMS AND ABBREVIATIONS USED** ..... **4**

**DECLARATION OF ACCURACY** ..... **6**

**1.0 OVERVIEW** ..... **7**

1.2 PROJECT UPDATE ..... 7
1.1 DCCEEW COMPLIANCE REVIEW 2025 ..... 10
1.2 SUMMARY OF COMPLIANCE ASSESSMENT FINDINGS AND RECOMMENDATIONS ..... 10

**2.0 APPROVAL CHANGES IN 2025** ..... **15**

2.1 VARIATION TO CONDITIONS ..... 15
2.2 STATEMENT 938 CHANGES AND REVIEW OF ENVIRONMENTAL MANAGEMENT PLAN ..... 15

**3.0 COMPLIANCE WITH EPBC 2014/7143 CONDITIONS** ..... **16**

3.1 COMPLIANCE DESIGNATION ..... 16
3.2 COMPLIANCE ASSESSMENT ..... 17

**4.0 CORRECTING NON-COMPLIANCES** ..... **30**

**5.0 NEW ENVIRONMENTAL RISKS** ..... **31**

**7.0 REFERENCES** ..... **32**

**APPENDIX A – KNOX CREEK PLAIN EMP COMPLIANCE ASSESSMENT 2025** ..... **33**

## FIGURES

Figure 1. Knox Plain – WA EPA-Approved Final Project Design Plan (October 2025) ..... 8
Figure 2. Farm area reduction and buffer area increase in Knox Final Design Plan 2025 ..... 9

## TABLES

Table 1. Knox EPBC-approved versus FPDP areas ..... 7
Table 2. Knox EMP 2025 potential non-compliances impacting EPBC 2014/7143 ..... 12
Table 3. EPBC 2014/7143 Knox Creek Plain - Compliance Table 2024 ..... 17
Table 4. List of EPBC 2014/7143 Evidence Cited ..... 29
Table 5. List of Knox EMP Evidence Cited ..... 29

## APPENDIX A - KNOX 2025 EMP COMPLIANCE ASSESSMENT TABLES

Appendix A Table 1. Soil Conservation Management Actions ..... 33
Appendix A Table 2. Soil monitoring regime. ..... 35
Appendix A Table 3. Chemical management actions ..... 36
Appendix A Table 4. Chemical use monitoring regime ..... 39
Appendix A Table 5. Dust and particulate management actions ..... 39
Appendix A Table 6. Dust and particulate monitoring regime ..... 40
Appendix A Table 7. Weed, plant pathogen and pest animal management actions ..... 40
Appendix A Table 8. Weed, plant pathogen and pest animal monitoring regime ..... 43
Appendix A Table 9. Surface water management actions ..... 44
Appendix A Table 10. Surface water monitoring regime ..... 44
Appendix A Table 11. Groundwater management and monitoring actions ..... 45
Appendix A Table 12. Groundwater contingency actions ..... 47
Appendix A Table 13. Discharge management actions ..... 47
Appendix A Table 14. Discharge monitoring regime and corrective actions ..... 50
Appendix A Table 15. Biodiversity and habitat management actions ..... 51
Appendix A Table 16. Biodiversity and habitat monitoring regime ..... 51
Appendix A Table 17. Buffer management actions ..... 52
Appendix A Table 18. Buffer monitoring regime ..... 54
Appendix A Table 19. Rehabilitation management actions ..... 55
Appendix A Table 20. Rehabilitation monitoring regime ..... 58
Appendix A Table 21. Aboriginal heritage management actions ..... 59
Appendix A Table 22. Aboriginal heritage monitoring regime and corrective actions ..... 60

# 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 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 I have no knowledge of that authorisation being revoked at the time of making this declaration.

| | |
|---|---|
| **Signed** | |
| **Full Name** | **JAMES ENGELKE** |
| **Position** | **GENERAL MANAGER** |
| **Organisation** | **KIMBERLEY AGRICULTURAL INVESTMENT PTY LTD (APPROVAL HOLDER)** |
| **ABN** | **60 154 270 194** |
| **Date** | **____ March 2025** |
| **Signed** | |
| **Full Name** | **RON GREENTREE** |
| **Position** | **DIRECTOR** |
| **Organisation** | **KEEP FARMING PTY LTD (DEVELOPMENT PARTNER)** |
| **ABN** | **27 640 171 679** |
| **Date** | **____ March 2025** |

# 1.0 Overview

On June 16, 2015, the Australian Government Department of the Environment, under delegation of the Minister for the Environment, issued Kimberley Agricultural Investment Pty Ltd (KAI) conditional approval to develop the Knox Creek Plain for irrigated agriculture. Approval 2014/7143 contains fifteen conditions targeted at ensuring the protection of Matters of National Environmental Significance, listed under the *Environment Protection and Biodiversity Conservation (EPBC) Act 1999.* Approval 2014/7143 permits the clearing and development of up to 6,280 hectares of land on the Knox Creek Plain. An additional (minimum) 6,415 hectares is required to buffer the impacts of the development on nearby landscapes.

This document reports on progress against implementation of the conditions of approval, for the period ending 31 December 2025, and has been prepared under the annual compliance report requirement contained in Condition 3 of EPBC 2014/7143.

It will be supplemented by the 2025 Annual Environmental Management Program (EMP) audit of compliance with the requirements of Statement 938, when prepared by the Western Australian Department of Primary Industries and Regional Development (DPIRD) as Proponent for the Statement 938 approval. Statement 938 was issued under the WA Environmental Protection Act 1986 by the Western Australian Minister for the Environment, in relation to the development of the M2 agricultural area, which includes the Knox Creek Plain. The 2025 Statement 938 EMP Compliance Assessment Report (CAR) was not available at the time of preparation and submission of this report.

## 1.2 Project update

Farming of the Knox Plain commenced in January 2025, with 852 hectares (ha) cropped. Development of the remainder of the farm continued.

In October 2025, the WA Environmental Protection Authority (EPA) approved the Knox Final Project Design Plan (FPDP), under the requirements of Ministerial Statement 938. The Knox EPBC approval intersects Ministerial Statement 938 (MS938), in that the EMP referenced in Condition 5 of EPBC 2014/7143 is prepared under MS938. The FPDP included buffer disturbance for stormwater, access and a borrow pit – all of which were included in the Knox EPBC referral and assessment documentation, including the Public Environment Review (PER) document.

The approved FPDP layout is provided in **Figure 1**. A formal variation request to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) is in preparation. The variation request will reflect the management arrangements and transfer of proponency to Keep Farming Pty Ltd; the FPDP as final design; and will include a revised EMP which accurately reflects operating arrangements and conditions.

For reference, the 2014/7143 approval Knox farm and buffer footprints are overlaid with the final design in **Figure *2*.** The farm area has reduced and buffer increased as follows:

***Table 1. Knox EPBC-approved versus FPDP areas***

| Proposed land use | EPBC 2014/7143 approval | Knox FPDP |
|---|---|---|
| **Farm lots (ha)** | 5,570 | 5,760.24 |
| **Infrastructure corridors (ha)** | 485 | |
| **Balancing storage (ha)** | 225 | |
| **Buffer area (ha)** | 6,415 | 6,834.02* |
| **Total hectares** | **12,695** | **12,594.26** |

* *includes buffer disturbance areas for firebreaks, fencing, borrow pit, stormwater outlets etc.*

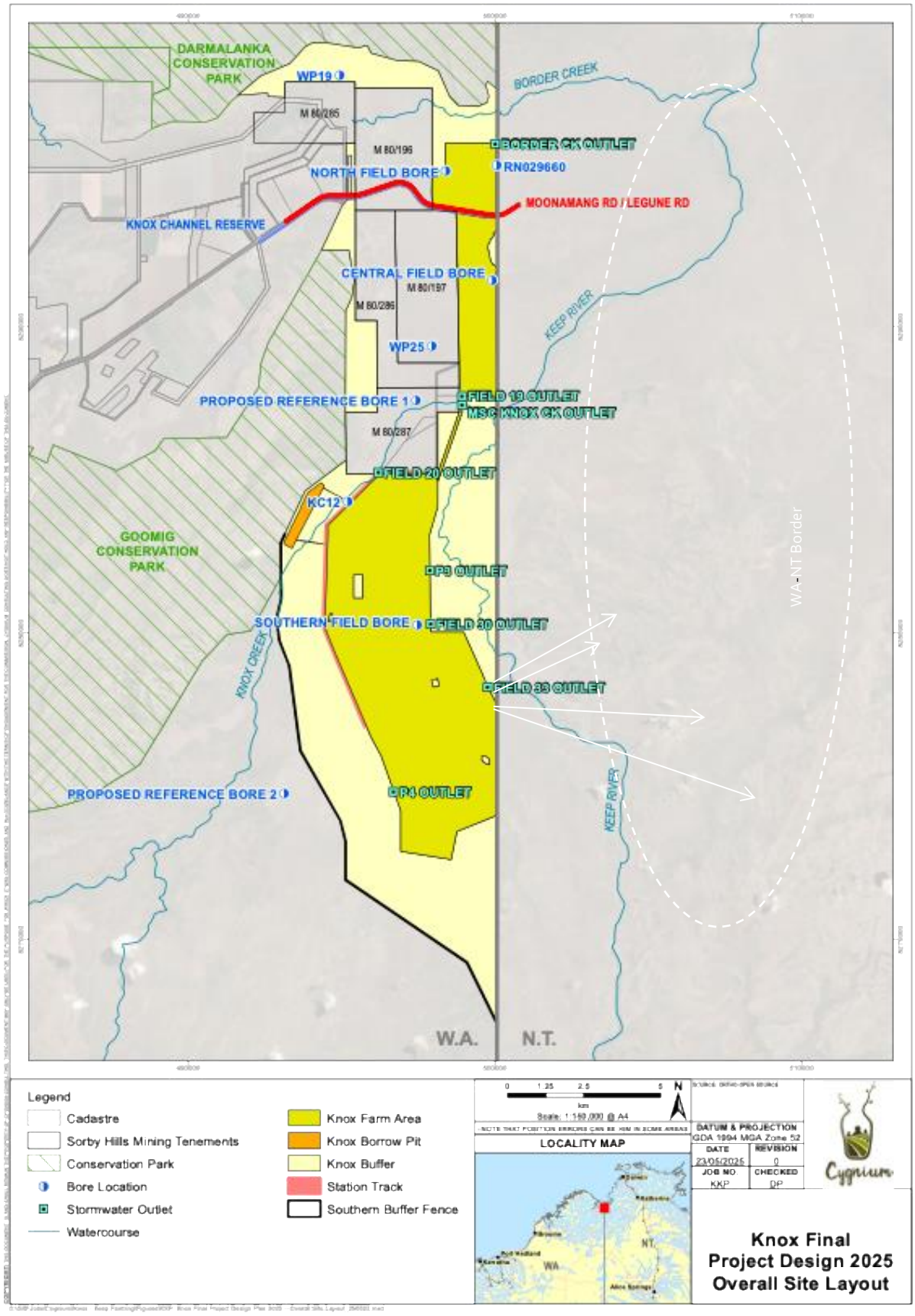


**Figure 1. Knox Plain – WA EPA-Approved Final Project Design Plan (October 2025)**

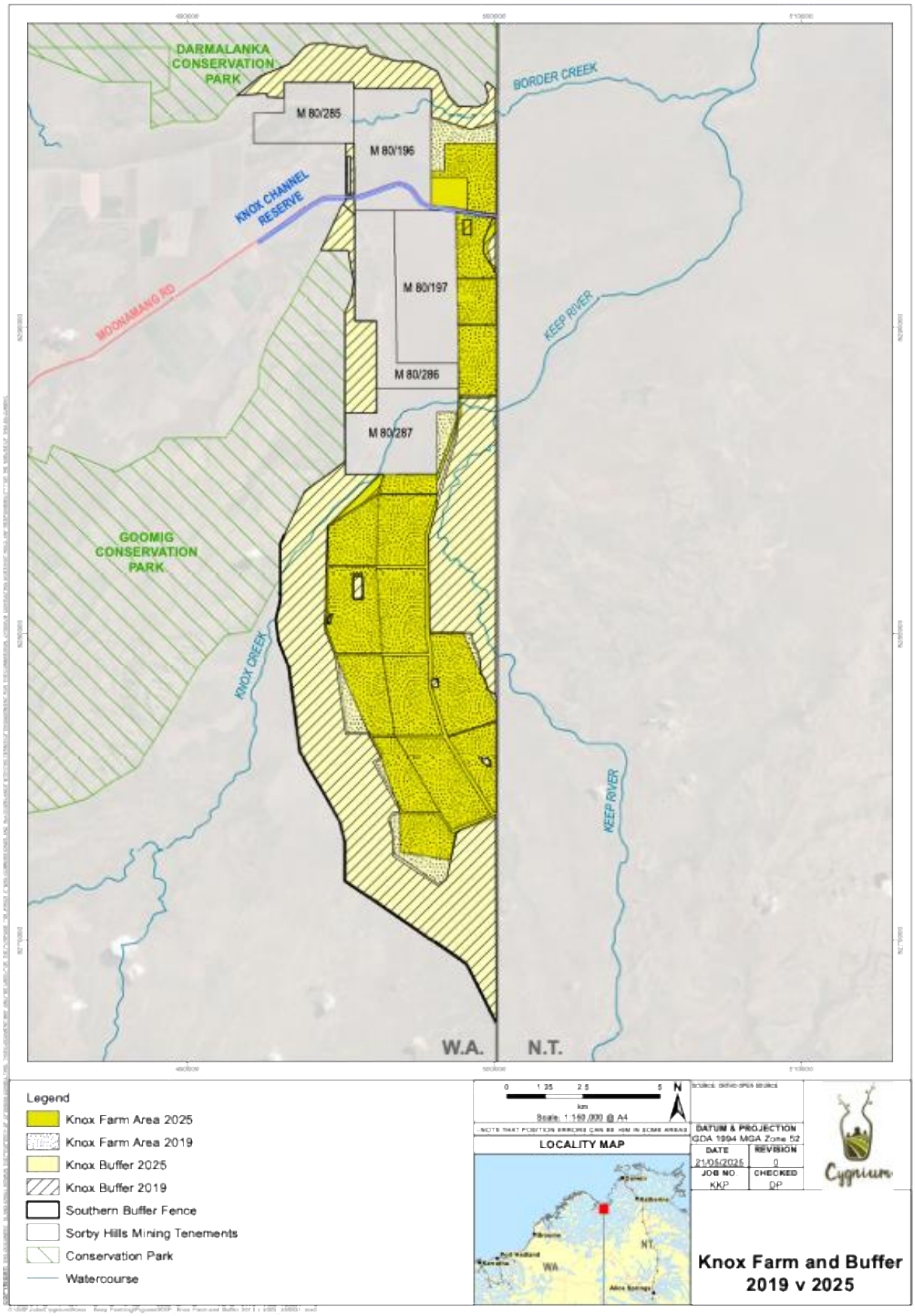


**Figure 2. Farm area reduction and buffer area increase in Knox Final Design Plan 2025**

## 1.1 DCCEEW Compliance Review 2025

On 11 June 2025, DCCEEW advised Keep Farming of a compliance inspection to be conducted on the Knox Creek Plain development, in relation to the conditions of EPBC 2014/7143. Keep Farming provided responses to DCCEEW prior to this visit, in relation to a 'Request for Information' notice that accompanied the notification of inspection.

The compliance inspection was undertaken by DCCEEW officers on 25 June 2025. The DCCEEW compliance officers inspected items identified in the 2023 EMP CAR, and the 2024 EPBC 2014/7143 Annual Environment Report (AER).

On 8 October 2025, DCCEEW issued a 'Notice of Intent – Compliance Action' to Keep Farming in relation to non-compliances under EPBC 2014/7143. Keep Farming provided a formal response to DCCEEW on 17 October 2025.

The response from Keep Farming to DCCEEW is provided as evidence item **2025 EPBC 2014-7143 Condition 2 – Keep Farming Response to DCCEEW**.

On 6 February 2026, Keep Farming received verbal advice that DCCEEW will be issuing a notice to revise the Knox management plans to align these with current management and operations. Formal advice on this matter was yet to be received at the time of preparation of this report.

## 1.2 Summary of Compliance Assessment Findings and Recommendations

Keep Farming's October 2025 response to DCCEEW (noted above) addressed concerns with non-compliance arising from previous reporting.

The 2024 Statement 938 and EMP CAR had not been completed by DPIRD at the time of preparation of this report. DPIRD's 2025 Statement 938 and EMP CAR was also incomplete. Consequently, Keep Farming has undertaken its own internal assessment of compliance with the Knox EMP, which is attached as **Appendix A**.

Non-compliances arising from Keep Farming's internal review of the Knox EMP implementation in 2025 are presented in **Table 2**.

Two issues have resulted in the potential non-compliances which have been identified in relation to the 2025 activity on Knox Plain. The potential non-compliances under the EMP inform the related EPBC 2014/7143 conditions.

### 1.2.1 Potential non-compliances and proposed remedies

**Condition 12B**
*"The person taking the action must implement the action in accordance with Sections 10 and 11 of the* Knox Creek Plain Environmental Management Program*, August 2015."*

Condition 12B has a partial (potential) non-compliance relating to clearing outside of the approved stormwater drainage path in late 2025 (noting that the footprint cleared of 2.57ha was less than the WA EPA-approved 2.99ha, with only part of the clearing being outside of the approved footprint). To permanently remedy this potential non-compliance, Keep Farming has submitted an amendment to the WA EPA-approved Knox Final Project Design Plan (FPDP). This amendment and incident details are included in evidence under Condition 10. There is no significant or material impact arising from this matter.

Once the amendment is approved by the WA EPA, a request to vary the Knox development footprint under EPBC 2014/7143 will be forwarded to DCCEEW. *The actual development footprint is smaller than the EPBC 2014/7143 approved development area.* It is noted that the FPDP approved by the WA EPA aligns with the *Typhonium sp. kununurra* offset and protection requirements of the WA Department of Biodiversity, Conservation and Attractions (DBCA).

EMP actions 6, 112, 113, 119 and 120 all have potential non-compliances assigned, due the stormwater outlet actual versus design footprint differences.

**Condition 15A**

"*The person taking the action must implement the action in accordance with Sections 7, 8 and 9 of the* Knox Creek Plain Environmental Management Program August 2015, *to minimise impacts on listed threatened and migratory species in the Keep River*".

Knox EMP section 8 is the Groundwater Management Sub-Plan. EMP actions 83, 84 and 91 all have potential non-compliances assigned in relation to groundwater.

A potential non-compliance arises due to revised modelling not being completed. The modelling update will be remedied following DPIRD's completion of the Goomig modelling, which is part of the same aquifer system. Modelling will also be affected by the (currently unknown) impact of the proposed adjacent Sweetwater agricultural development, which is under assessment as EPBC 2025/10235.

A further potential non-compliance arises from the requirement to increase the high intensity monitoring bores. Keep Farming is in discussion with DPIRD regarding the replacement of bores which were no longer operationally pragmatic; the installation of additional monitoring bores; and the inclusion of additional data loggers to meet the requirements of the Knox EMP Groundwater Management Sub-plan, and therefore compliance with Condition 15A.

*Table 2. Knox EMP 2025 potential non-compliances impacting EPBC 2014/7143*

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| **CLEARING MANAGEMENT** | | | | | | |
| EMP 6 | Delineate the boundaries of the vegetation to be cleared for construction in the field with flagging tape, signage or fencing. | To minimise erosion by preventing unauthorised ground disturbance. | Prior to ground disturbance | 2025.KEMP.3a | PNC | Refer to attached incident report relating to the construction of the central stormwater outlet (2025.KEMP.3a). The as-constructed location of the stormwater outlet was misaligned to the approved area, but nevertheless the footprint cleared was smaller than that approved. This occurred due to site conditions indicating a drainage pathway which varied slightly from the planned route. |
| EMP 112 | Ensure development maps clearly delineate the Buffer Area and Development Area | To prevent unauthorised clearing by ensuring clearing boundaries are appropriately documented. | Prior to ground disturbance | 2025.KEMP.3a | PNC | Refer to incident report re clearing footprint at stormwater outlet (2025.KEMP.3a) / EMP 6. |
| EMP 113 | Delineate the boundaries of the vegetation to be cleared for construction in the field with flagging tape, signage or fencing. | To prevent unauthorised clearing by ensuring clearing boundaries are appropriately marked in the field. | Prior to ground disturbance | 2025.KEMP.3a | PNC | Refer to incident report re clearing footprint at stormwater outlet (2025.KEMP.3a) / EMP 6. |

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| EMP 119 | Compliance of marked clearing boundary with development maps. | Daily | No clearing adjacent to areas where clearing boundaries are not defined. | Report as Environmental Incident and initiate Incident Procedure which shall include:<br>• investigating the cause of the incident,<br>• redefining boundaries. | Refer to EMP 3, and EMP 6.<br><br>2025.KEMP.3a | PNC | Refer to EMP 3, and EMP 6.<br><br>The corrective action has been undertaken as required, per 2025.KEMP.3a. |
| EMP 120 | Extent of clearing and ground disturbance | Daily | No clearing or disturbance outside | Report as Environmental Incident and initiate Incident | Refer to EMP 3, and EMP 6. | PNC | Refer to EMP 3, and EMP 6. |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | along pre-defined boundaries. | | of pre-defined boundaries. | Procedure which shall include:<br>• investigating the cause of the incident<br>• redefining boundaries if due to inadequate boundary marking,<br>• rehabilitating affected area as required in accordance with the Rehabilitation Management Sub-plan,<br>• monitoring the success of remedial action. | 2025.KEMP.3a | | The corrective action has been undertaken as required, per 2025.KEMP.3a. |
| Item | Action | Purpose | Timing | Evidence | Status | Comment | |
| **GROUNDWATER MONITORING** | | | | | | | |
| KEMP 83 | Expand the groundwater monitoring bore network to include:<br>• 'high intensity' regional bores (i.e. auto loggers installed)<br>'low intensity' regional bores (i.e. no auto loggers installed but monitored manually). | To allow the collection of baseline and ongoing groundwater data to guide management. | Install prior to commencement of clearing of farm lots, a minimum of 18 months prior to irrigation. | 2025.KEMP.31a | PNC | This is an historical PNC carried forward from DPIRD (2023 Annual Report) as the timing is 18 months prior to irrigation. The Knox bore monitoring network was expanded (additional to the Goomig network) from 2015, with annual monitoring since that time.<br><br>Groundwater bores on the Knox Creek Plain have been monitored since 2015 including in the capacity of some as Goomig reference bores. A database of field and laboratory records since 2015 is available.<br><br>The previous auditor noted that the monitoring network requires confirmation in consultation with the Goomig-Knox Independent Review Group that operates under EPBC 2010/5491 and EPBC 2010/7143. Until this is completed, the | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | | previous auditor assessed as potentially non-compliant.<br><br>New bore locations are under investigation in conjunction with advice from DPIRD's hydrogeologists, with data loggers to be installed for high intensity monitoring. |
| KEMP 84 | Undertake monitoring of the parameters below for bores established under Item 1 [KEMP 83]<br>High intensity bores:<br>• groundwater levels and temperature (automatic, daily)<br>• EC, pH, TDS, nutrients and pesticides seasonally<br>Low intensity bores:<br>• Groundwater levels, EC, pH, TDS, nutrients, and pesticides seasonally | To collect baseline and ongoing groundwater data to determine any adverse effects to the receiving environment from the Proposal. | Commencing 18 months prior to commencement of irrigation. | 2025.KEMP.31a<br>2025.KEMP.84a<br>2025.KEMP.84b<br>2025.KEMP.84c | PNC | The monitoring regime for the Knox Plain is provided on Page 50 of 2025.KEMP.31a. It does not require seasonal nutrients and pesticides. Laboratory analysis is required three-yearly. The last triennial laboratory analysis was undertaken in 2023 per 2025.KEMP.84b and 2025.KEMP.84c.<br>Annual depth and in-situ water quality analysis is undertaken on the listed Knox bores, per 2025.KEMP.84a.<br><br>The groundwater monitoring regime, distribution of bores and groundwater will be attended to in 2026, informed by the work of DPIRD discussed under KEMP 91. |
| KEMP 91 | Update groundwater model and operation of groundwater management system with monitoring data. | To assist in determining an optimal dewatering strategy and to forecast potential breaches of trigger values within a ten-year period. | Prior to commencement of irrigation and subsequently every 2–4 years depending on monitoring trends. If worst case scenario indicated a breach in trigger levels, modelling must be updated every two years. | 2025.KEMP.91a | PNC | The Knox groundwater model was not updated prior to the commencing of irrigation. However, the Knox groundwater modelling was originally completed by Cymod Systems in 2014 (as previously reported).<br><br>DPIRD has engaged Nullspace Technologies to revise the Goomig groundwater model. Once this is complete, the Knox model can be updated, as this work correlates. The Goomig groundwater model update is due in 2026, and will inform the Knox modelling. |

# 2.0 Approval Changes in 2025

## 2.1 Variation to conditions

No condition variations were issued in 2025.

## 2.2 Statement 938 changes and review of Environmental Management Plan

Ministerial Statement 938 covers both the Weaber Plain (Goomig) and Knox Creek Plain developments. The WA DPIRD, as proponent under Statement 938, is undertaking a full EMP review in early 2026.

It will be submitted to the DCCEEW as required under the (revised) condition 5 of the Knox Creek Plain EPBC approval when the WA government and the EPA complete the revision process. It is noted that the revised EMP will transition to outcomes-based environmental compliance, rather than prescriptive actions currently included in the approved Statement 938 EMP.

# 3.0 Compliance with EPBC 2014/7143 Conditions

Table 3 provides a summary of compliance with EPBC conditions during the period 1 January 2025 to 31 December 2025. Commentary includes the period to February 2026, noting the commencement of farming on Knox in January 2025.

This report is supplemented by the Statement 938 Annual Compliance Assessment Report (CAR) for 2025, to be prepared by DPIRD, which is informed by Appendix A, addressing compliance with the Knox EMP.

The assessment provided in Table 3 is based on evidence collated by Keep Farming and KAI, including responses to DCCEEW and other regulators; site inspections on 20 June 2025 and with DCCEEW on 25 June 2025; and interviews conducted with Keep Farming across the 2025 year and in early 2026.

## 3.1 Compliance Designation

In accordance with Section 3.7 of the *Annual Compliance Report Guidelines* (Commonwealth of Australia, 2023), the following designations have been applied to findings –

***Compliant***
'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.

***Non-compliant***
A designation of 'non-compliant' must be given where the requirements of a condition or elements of a condition, including the implementation of management plans or other measures required by those conditions, have not been met.

***Not applicable***
A designation of 'not applicable' must be given where the requirements of a condition or elements of that condition fall outside of the scope of the current reporting period. For example, a condition that applies to an activity that has not yet commenced.

A designation of '***potentially non-compliant'*** has been included by the auditor, where the requirements are conflicting, outdated, not statutorily achievable, partially met or a combination of these factors. It is noted that where inconsistencies in the action are clear, this is being addressed in the current review of the environment management plans being undertaken by/for DPIRD, which will apply to farming on the Knox.

## 3.2 Compliance Assessment

Table 3. EPBC 2014/7143 Knox Creek Plain - Compliance Table 2024

| Condition Reference | Requirement | Is the Project compliant with this condition? | Evidence / Comments |
|---|---|---|---|
| 1 | Within 30 days after the commencement of the action, the person taking the action must advise the Department in writing of the actual date of commencement. | Compliant. Completed. | The action commenced on 26 May 2020. KAI provided written advice to DAWE on 12 June 2020 confirming the commencement of the action.<br><br>The Department acknowledged receipt of the letter and the commencement of the action in correspondence 15/016402 dated 17 June 2020.<br><br>This condition is therefore considered to have been met. |
| 2 | The person taking the action must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plans required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media. | Compliant. | KAI and Keep Farming are maintaining records of environmental investigations and compliance with the requirements of EPBC 2014/7143.<br><br>Review is undertaken by DPIRD in relation to the associated Statement 938 Environmental Management Plan, which has overlapping obligations. |
| 3 | By 31 March of each year after commencement of the action, the person taking the action must publish a report on their website addressing compliance with the conditions of this approval over the previous 12 months, including implementation of any management plans as specified in the conditions. Non-compliance with any of the conditions of this approval must be reported to the Department within two days of the person taking the action becoming aware of the non-compliance and at the same time as the compliance report is published. The person taking the action must continue to publish the report until such time as agreed in writing by the Minister or the approval has expired. | Compliant | The 2024 EPBC 2014-7143 report was emailed to DCCEEW on 27 March 2025, and uploaded to the website www.kai-australia.com.au on the same day. Annual reports covering the 2016 to 2024 reporting years remain accessible on KAI's website. DPIRD had not completed the 2024 Knox EMP audit at the time of preparation of the 2025 Knox EMP audit (contained herewith).<br><br>**Evidence items:**<br>2025 EPBC 2014-7143 Condition 3 - 2024 Knox Creek Plain Annual Report<br>2025 EPBC 2014-7143 Condition 3 – Annual Environment Report Lodgement Email to DCCEEW<br>2025 EPBC 2014-7143 Condition 3 – Confirmation of Knox AER upload to KAI website |

| Condition Reference | Requirement | Is the Project compliant with this condition? | Evidence / Comments |
|---|---|---|---|
| | | | Per the EMP audit (**Appendix A**), and the attached incident report (**2025.KEMP.3a**), clearing for a stormwater out exceeded the boundary approved under the *Final Project Design Plan* (FPDP) for Knox (**2025 EPBC 2014-7143 Condition 10**). The FPDP is approved under Statement 938. Incident reporting and follow-up with the WA regulator has been undertaken, but was not provided to DCCEEW as a non-compliance as a response has not been received. Given that (a) the final clearing area in this incident (2.57ha) was less than the approved area (2.99ha) and that the as-constructed clearing overlapped substantially with the approved area; (b) the incident has been reported; (c) infrastructure construction in the Knox buffer for drainage and other necessary purposes was authorised in the original Knox approval 2014/7143; and (d) an addendum to the FPDP to accommodate the actual versus designed positioning of the drain has been submitted to the WA EPA, the degree of non-compliance is very low, and therefore this reporting condition is considered to have been met. |
| **4** | Upon the direction of the Minister, the person taking the action must ensure that an independent audit of compliance with the conditions of approval is conducted and submitted to the Minister. The person taking the action must not commence the audit until the independent auditor and audit criteria have been approved by the Minister. The audit report must address the criteria to the satisfaction of the Minister. | Not applicable. | No independent audits were requested by DCCEEW in 2025, however a request for further information was received in June 2025, followed by a site inspection, and a Notice of Intent issued in October 2025.<br><br>**Evidence item:**<br>2025 EPBC 2014-7143 Condition 2 – Keep Farming Response to DCCEEW |
| **5** | The person taking the action may choose to revise the *Knox Creek Plain Environmental Management Program, August 2015*; Bare-rumped Sheathtail Bat Management Plan; and Aquatic Fauna Management Plan, approved by the Minister without submitting it for approval (including under section 14A of the EPBC Act), if the taking of the action in accordance with the revised plan would not be likely to have a new or increased impact. If the person taking the action makes this choice they must: | Not applicable. | There were no finalised revisions to management plans in 2025.<br><br>KAI and Keep Farming have contributed to the revised '*Goomig and Knox Stormwater and aquatic fauna management plan'* for EPBC 2010/5491 and EPBC 2014/7143, which is under preparation by an independent consultant for DPIRD, at the time of preparation of this report. Appropriate Ministerial approvals will be sought once approved by the IRG.<br><br>DPIRD is overseeing the revision of the EMP under Statement 938 requirements, which intersect with EPBC 2014/7143. The Minister will be notified as required under Condition 5 at the appropriate time. |
| | a) Notify the Department in writing that the approved plan has been revised and provide the Department, at least four weeks before implementing the revised plan, with: | | |
| | i. An electronic copy of the revised plan; | | |

| Condition Reference | Requirement | Is the Project compliant with this condition? | Evidence / Comments |
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| | ii. An explanation of the differences between the revised plan and the approved plan; and<br>iii. The reasons the person taking the action considers that the taking of the action in accordance with the revised plan would not be likely to have a new or increased impact. | | |
| 5A | The person taking the action may revoke its choice under condition 5 at any time by giving written notice to the Department. If the person taking the action revokes its choice to implement the revised plan, without approval under Section 143A of the EPBC Act, the plan approved by the Minister must be implemented. | Not applicable. | Not applicable. |
| 5B | If the Minister gives a notice to the person taking the action that the Minister is satisfied that the taking of the action in accordance with the revised plan would be likely to have a new or increased impact, then:<br>i. Condition 5 does not apply, or ceases to apply, in relation to the revised plan; and<br>ii. The person taking the action must implement the plan approved by the Minister.<br>To avoid any doubt, this condition does not affect any operations of conditions 5 or 5A in the period before the day the notice is given.<br>At the time of giving the notice, the Minister may also notify that for a specified period of time condition 5 does not apply to the plan required under the approval.<br>Conditions 5, 5A and 5B are not intended to limit the operation of section 143A of the EPBC Act which allows the person taking the action to submit a revised plan to the Minister for approval. | Not applicable | Not applicable |
| 6 | If the Minister believes that it is necessary or convenient for the better protection of the listed threatened or migratory species to do so, the Minister may request that the person taking the action make specified revisions to the management plans specified in the conditions and submit the revised management plan for | Not applicable | Not applicable. |

| Condition Reference | Requirement | Is the Project compliant with this condition? | Evidence / Comments |
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| | the Minister's written approval. The person taking the action must comply with any such request. The revised approved management plan must be implemented. Unless the Minister has approved the revised management plan, then the person taking the action must continue to implement the management plan originally approved, as specified in the conditions. | | |
| 7 | If, at any time after five years from the date of this approval, the person taking the action has not substantially commenced the action, then the person taking the action must not substantially commence the action without the written agreement of the Minister. | Not applicable.<br><br>Completed. | Not applicable. |
| 8 | Unless otherwise agreed in writing by the Minister, the person taking the action must publish all management plans referred to in these conditions of approval and any baseline information and monitoring results required by these plans on their website. Each management plan must be published on the website within one month of being approved and all baseline information and monitoring results must be published on the website annually, beginning twelve months after the commencement of the action. The person taking the action must continue to publish the approved management plans and baseline information until such time as agreed in writing by the Minister or the approval has expired. | Compliant. | Management plans, previous EPBC 2014/7143 Annual Environment Reports and previous Statement 938 EMP Compliance Assessment Reports can be found on KAI's website at www.kai-australia.com.au<br><br>Weaber Plain (Goomig) EPBC 2010/5491 management plans applicable to the Knox Plain are available online at https://www.wa.gov.au/government/document-collections/ord-expansion-project-australian-environmental-approval-documents<br>Monitoring reports are also published on this website.<br><br>The Statement 938 Compliance Assessment Report for the 2024 year was still in preparation by DPIRD at the time of completion of this annual EPBC report. EMP compliance was thoroughly considered by DCCEEW compliance staff in 2025, as discussed in Section 1.1 of this document. Appendix A provides Keep Farming's assessment of compliance with the Knox EMP in 2025. |
| 9 | ~~Any amendments to Sections of the *Knox Creek Plain Environmental Management Program May 2015* referred to in the conditions below must be submitted to the Department and approved by the Minister prior to any amendments being implemented.~~ | Not applicable.<br><br>Condition revoked 24/4/2017. | Not applicable. |
| 10 | To avoid and/or minimise impacts on listed threatened and migratory species from impacts resulting from the action, the person taking the action must not clear more than 6,280ha of vegetation, as specified by 'Proposed Development Area" in Annexure 1. | Compliant. | A total of 5,462.4 hectares of farmland and infrastructure corridors were cleared on the Knox Creek Plain between 2020 and December 2025, including the central stormwater outlet constructed in 2025.<br><br>**Evidence items:** |

| Condition Reference | Requirement | Is the Project compliant with this condition? | Evidence / Comments |
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| | | | 2025 EPBC 2014-7143 Condition 10 – Knox Creek Plain FPDP Approved October 2025<br>2025 EPBC 2014-7143 Condition 10 – FPDP Approval Letter to DPIRD from EPA<br>2025 EPBC 2014-7143 Condition 10 – Knox Creek Plain FPDP P3 Outlet Amendment March 2026 |
| **11** | To protect the critically endangered Bare-rumped Sheathtail Bat (*Saccolaimus saccolaimus nudicluniatus*) from impacts resulting from the action, the person taking the action must: | Compliant.<br><br>Completed. | The Bare-rumped Sheathtail Bat (BRSB) is now listed as **VULNERABLE** and not Critically Endangered, under the EPBC Act 1999.<br><br>As reported in the 2022 EPBC 2014-7143 Annual Environment Report, Bare-rumped Sheathtail Bat (BRSB) habitat and tree assessments were completed under the guidance of Dr Kyle Armstrong from Specialized Zoological. Subsequently, following requests for resolution of outstanding queries regarding Condition 11 (noting that the BRSB is no longer listed as 'Critically Endangered', but is now listed under the EPBC Act as 'Vulnerable', DCCEEW provided advice as follows:<br>As discussed, further to your request for variation of the conditions attached to this EPBC Act approval and our consideration of a proposed draft, I confirm that, as you have undertaken a survey of the 'potential Bare-rumped Sheathtail Bat (BRSB) habitat areas' with the advice of relevant experts, it is open to you to determine, without any variation of the conditions, that neither BRSB, nor trees in which BRSB might roost, occur in the 'potential BRSB habitat areas' and, on that basis, that the action will not result in the death of any BRSB and that you do not need to have a BRSB Management Plan approved.<br><br>No potential or confirmed BRSB roost trees were identified during the surveys.<br><br>A BRSB Management Plan is therefore not required.<br><br>Consequently, KAI previously advised that it considered that Condition 11 is now resolved. |
| **11A** | Ensure the clearance of the Development Area does not result in the death of any Bare-rumped Sheathtail Bats | Compliant. | |
| **11B** | Conduct Bare-rumped Sheathtail Bat roosting tree surveys of potential Bare-rumped Sheathtail Bat habitat areas in accordance with the advice of a Bare-rumped Sheathtail Bat expert. Bare-rumped Sheathtail Bat roosting tree surveys must identify, tag and map all potential or confirmed Bare-rumped Sheathtail Bat roost trees in the potential Bare-rumped Sheathtail Bat habitat areas and be completed within six months prior to clearance of potential Bare-rumped Sheathtail Bat habitat areas; and | Compliant.<br>Completed. | |
| **11C** | If the Bare-rumped Sheathtail Bat roosting tree surveys identify potential or confirmed Bare-rumped Sheathtail Bat roost trees in the potential Bare-rumped Sheathtail Bat habitat areas, then submit to the Department a Bare-rumped Sheathtail Bat Management Plan (BRSBMP). The BRSBMP must detail how all potential and confirmed Bare rumped Sheathtail Bat roost trees in the potential Bare-rumped Sheathtail Bat habitat areas will be avoided, mitigated or offset. The BRSBMP must be submitted for approval by the Minister. The person taking the action must not commence clearance of potential Bare-rumped Sheathtail Bat habitat areas until the BRSBMP is approved by the Minister. The BRSBMP must be approved by the Minister prior to implementation | Not applicable. | |

| Condition Reference | Requirement | Is the Project compliant with this condition? | Evidence / Comments |
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| | The approved BRSBMP must be implemented and include commitments to: | | |
| **11C(i)** | Consider the implementation of more focused survey methods, such as mist netting, to obtain more refined results. This may be particularly beneficial in the event that the number of potential or confirmed Bare-rumped Sheathtail Bat roost trees identified during Bare-rumped Sheathtail Bat roosting tree surveys is high: | Not applicable. | Not applicable. |
| **11C(ii)** | Conduct all clearance of potential Bare-rumped Sheathtail Bat habitat areas outside of the Bare-rumped Sheathtail Bat breeding season | Not applicable. | Not applicable. |
| **11C(iii)** | Conduct a pre-clearance disturbance regime in accordance with the advice of a Bare-rumped Sheathtail Bat expert | Not applicable. | Completed in 2022 and reported in the 2022 annual report for EPBC 2014-7143. |
| **11C(iv)** | Fell any potential or confirmed Bare-rumped Sheathtail Bat roost trees that cannot be avoided, with care, in the presence of a Bare-rumped Sheathtail Bat expert, and in accordance with the advice of a Bare-rumped Sheathtail Bat expert, so as to avoid mortality of Bare-rumped Sheathtail Bat individuals | Not applicable. | Not applicable. |
| **11C(v)** | Translocate, with the service of a Bare-rumped Sheathtail Bat expert, any Bare rumped Sheathtail Bat that is captured following the felling of a potential or confirmed Bare-rumped Sheathtail Bat roost tree | Not applicable. | Not applicable. |
| **11C(vi)** | Report site locations (both original location site and, if a Bare-rumped Sheathtail Bat is captured, the translocated site) to the Department if any confirmed Bare rumped Sheathtail Bat roost trees are found | Not applicable. | Not applicable. |
| **11C(vii)** | Provide offsets of no less than $100,000 to a trust fund for Bare-rumped Sheathtail Bat research for each confirmed Bare-rumped Sheathtail Bat roost tree cleared for the proposal, to a maximum contribution of $500,000. The offset trust fund and research activities must be approved by the Minister prior to implementation; or | Not applicable. | Not applicable. |

| Condition Reference | Requirement | Is the Project compliant with this condition? | Evidence / Comments |
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| **11C(viii)** | Not clear selected potential or confirmed Bare-rumped Sheathtail Bat roost trees or any vegetation within a 30m zone around these trees | Compliant. | No BRSB potential or confirmed habitat trees were identified in the central stormwater outlet path prior to clearing in 2025. Habitat (vegetation types) are not consistent with BRSB roosting tree presence. |
| **12** | Buffer Management | | |
| **12A** | The person taking the action must establish a buffer area of at least 6,415ha, as specified by "Proposed Buffer Areas" in Annexure 1. | Compliant. | Knox Plain buffer areas totalling 6,896.16 hectares have been identified in the Typhonium management plan endorsed by the WA government (DPIRD, 2023a). This exceeds the minimum required buffer area of 6,415ha. The proposed buffer disturbance, to be reported in the 2025 AER *if* accepted by the WA Government (DBCA and DWER), will reduce the undisturbed buffer area to 6550.8ha, which exceeds the minimum required buffer area by 136.8ha. |
| **12B** | The person taking the action must implement the action in accordance with Sections 10 and 11 of the Knox Creek Plain Environmental Management Program, August 2015. | Potentially non-compliant | **KNOX EMP SECTION 10: BIODIVERSITY AND HABITAT MANAGEMENT SUB-PLAN**<br>**KNOX EMP SECTION 11: BUFFER MANAGEMENT SUB-PLAN**<br>Clearing for the central stormwater outlet, reported as an incident in evidence item 2025.KEMP.3a resulted in potential non-compliances being applied to items EMP 3, EMP 112, EMP 113, EMP 119 and EMP 120.<br><br>**Evidence items:**<br>Refer to Appendix A and evidence cited in Appendix A. |
| **12C** | The person taking the action must ensure that none of the following habitat trees or any vegetation within a 30m zone around these trees are cleared within the Buffer Area: | Compliant. | |
| **12C(i)** | Confirmed or potential Bare-rumped Sheathtail Bat (*Saccolaimus Saccolaimus nudicluniatus*) roosting trees; | Compliant. | No BRSB confirmed or potential roosting trees were cleared or identified within 30m of the stormwater outlet constructed in 2025. |
| **12C(ii)** | Gouldian Finch *(Erythrura gouldiae*) breeding trees; | Compliant. | No Gouldian Finch breeding trees were identified within 30m of the stormwater outlet constructed in 2025. |
| **12C(iii)** | Red Goshawk (*Erythrotiorchis radiatus*) nesting trees; and | Compliant. | No Red Goshawk nesting trees were identified within 30m of the stormwater outlet constructed in 2025. |
| **12C(iv)** | Masked Owl (Northern) (*Tyto novaehollandiae kimberli*) nesting trees. | Compliant. | No Masked Owl nesting trees were identified within 30m of the stormwater outlet constructed in 2025. |
| **12C(v)** | The location and date of any incidental sightings of the species listed in Condition 12.C above must be reported to the Department within 30 days of occurrence. | Compliant. | No incidental sightings of the species listed above have been made by employees or contractors of Keep Farming or KAI in the Knox development area. |
| **13** | Weed and Pest Animal Management | | |

| Condition Reference | Requirement | Is the Project compliant with this condition? | Evidence / Comments |
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| **13A** | The person taking the action must implement the action in accordance with Section 6 of the Knox Creek Plain Environmental Management Program August 2015. | Compliant | **KNOX EMP SECTION 6: WEED AND PEST ANIMAL MANAGEMENT:**<br>Refer to Appendix A.<br>**Evidence item:**<br>2025.KEMP.54a Goomig-Knox Weed Survey Report 2025 |
| **14** | Independent Review Group | | |
| **14A** | The person taking the action must appoint an Independent Review Group (IRG) to review the impacts of the action on aquatic listed threatened and migratory species. The IRG must be established prior to the submission of the Aquatic Fauna Management Plan to the Minister for approval. If a condition of another approval held by the proponent requires an IRG identical in nature, the proponent may meet the relevant requirements of both conditions by appointing a single IRG. The IRG must be established by the person taking the action in accordance with the following requirements: | Compliant. | The Goomig-Knox IRG met on 10 April 2025. Formal merging of the Goomig and Knox IRGs has not occurred, however there is a 50% membership overlap, and the expertise represented by the members meets the IRG requirements per Condition 14A. Each member has been Ministerially approved for membership of at least one of the IRGs on the basis of their expertise.<br><br>The assessment is therefore that the intent of Condition 14A has been met.<br><br>Formal endorsement of the combined Goomig-Knox IRG is advised, and it is recommended that the Proponents jointly write to DCCEEW seeking Ministerial support for the joint IRG. |
| **14A(i)** | The IRG must be funded, resourced and managed by the person taking the action. | Compliant. | Resourcing and executive support to the Goomig-Knox IRG is provided by DPIRD, with participation and input from KAI. |
| **14A(ii)** | The IRG must consist of independent scientific and technical experts, of whom at least one must be a *Glyphis* and *Pristis* expert and two must be technical experts with at least five years' experience in northern Australian surface water and groundwater hydrology, approved by the Minister. | Compliant. | The Goomig-Knox IRG membership consists of<br><br>**David Menzel** (Chair) – also approved Knox IRG Chair.<br>**Dr Ray Evans** – also approved Knox IRG member - technical expert with at least five years experience in northern Australian surface water and groundwater hydrology.<br>**Dr Mark Silburn** (Queensland Government) - technical experts with at least five years experience in northern Australian surface water and groundwater hydrology.<br>**Dr David Morgan** (Murdoch University) - *Glyphis* and *Pristis* expert.<br>**Dr Richard George**, approved Knox IRG Member, also attends the Weaber IRG meetings.<br><br>Ministerial approval of the combined IRG membership is required, including the replacement of Dr Helen Larsen with Dr David Morgan as the Knox approval *Glyphis* and *Pristis* expert. This is administrative and therefore the project is considered to be compliant on this sub-condition as the substantive intent has been met. |
| **14A(iii)** | Terms of Reference for the IRG must be prepared by the person taking the action and submitted for approval by the Minister. The Terms of Reference must include the | Compliant. | Knox IRG Terms of Reference were endorsed in a previous reporting period. There has been no change to the Knox Terms of Reference, noting that formal changes and a request to merge with the Goomig IRG (despite different approval holders) is required. |

| Condition Reference | Requirement | Is the Project compliant with this condition? | Evidence / Comments |
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| | frequency of proposed meetings, tenure of membership, and chairing and quorum arrangements. The Terms of Reference must be approved by the Minister in writing prior to the submission of the *Aquatic Fauna Management Plan* to the Minister for approval. | | Draft Terms of Reference for a formally amalgamated IRG can be found in evidence item 2025.EPBC 2014-7143 Condition 14 – Goomig-Knox Joint IRG – Draft Terms of Reference. It is expected that this revised ToR will be submitted to the Minister in 2026. |
| **14A(iv)** | The IRG must provide advice to the person taking the action on any revisions to the *Aquatic Fauna Management Plan*. The advice of the IRG must also be provided to the Minister. | Compliant. | The Aquatic Fauna Management Plan for the Keep River is currently under review, lead by DPIRD. Formal approval will be sought from the Minister, following IRG review at its February 2026 meeting.<br><br>The revised plan, which incorporates stormwater and groundwater management, will apply to both Goomig and Knox. |
| **14A(v)** | The IRG must assess any exceedances of trigger values and advise changes to the person taking the action as required; and | Compliant. | Trigger values exceeded in the Keep River in 2025 could not be attributed to Keep Farming. Water quality monitoring results were reviewed by the IRG at its February 2026 meeting.<br><br>**Evidence items:**<br>2025.KEMP.31a Goomig-Knox Surface Water Report to IRG<br>2025 EPBC 2014-7143 Condition 14 – IRG Meeting Agenda – 10 April 2025<br>2025 EPBC 2014-7143 Condition 14 – IRG Agenda Items – 25 February 2026 (includes April 2025 minutes) |
| **14A(vi)** | The Minister may seek advice from the IRG at any time. | Not applicable. | No requests from the Minister were received in 2024 in relation to the impacts of the Knox development on aquatic MNES. |
| **15** | Aquatic Fauna Management. | | |
| **15A** | The person taking the action must implement the action in accordance with Sections 7, 8 and 9 of the *Knox Creek Plain Environmental Management Program August 2015*, to minimise impacts on listed threatened and migratory species in the Keep River. | Potentially non-compliant | **KNOX EMP SECTION 7: SURFACE WATER MANAGEMENT SUB-PLAN:**<br>Compliant.<br><br>**KNOX EMP SECTION 8: GROUNDWATER MANAGEMENT SUB-PLAN:**<br>Potentially non-compliant.<br>Refer to discussion in Appendix A Table 11.<br><br>**KNOX EMP SECTION 9: DISCHARGE MANAGEMENT SUB-PLAN:**<br>Compliant.<br><br>**Relevant evidence:**<br>2025.KEMP.31a Goomig-Knox Surface Water Report to IRG 2025<br>2025.KEMP.84a Knox Groundwater Monitoring Field Records 2025<br>2025.KEMP.84b 2023 Groundwater Bores – Stressors and pesticides |

| Condition Reference | Requirement | Is the Project compliant with this condition? | Evidence / Comments |
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| | | | 2025.KEMP.84c 2023 Groundwater Bores - Metals |
| **15B** | In order to mitigate impacts to listed threatened and migratory species in the Keep River from impacts resulting from the action, the person taking the action must prepare an Aquatic Fauna Management Plan (AFMP), in consultation with the IRG. The AFMP must be submitted for approval by the Minister. The person taking the action must not commence clearance of the Development Area until the AFMP is approved by the Minister. The approved AFMP must be implemented. If a condition of another approval held by the proponent requires an AFMP, the proponent may meet the relevant requirements of both conditions by submitting a single plan. If a single plan is submitted, the plan must identify to which approval the sections of the plan relate. The AFMP must include: | **Compliant.** | The Knox AFMP was approved by the Department on 23 December 2016, as previously reported. See notes above under Condition 14A regarding the joint operation of the Weaber and Knox IRGs.<br><br>The revised AFMP for Goomig and Knox was under preparation in 2024 by an independent consultant engaged by DPIRD. This had not been finalised at the time of the preparation of this AER. |
| **15B(i)** | A targeted, non-lethal baseline surveying program for listed threatened species that are likely to occur in the Keep River. This must include the critically endangered Speartooth Shark (*Glyphis glyphis*), the endangered Northern River Shark (*Glyphis garricki*), the vulnerable Dwarf Sawfish (*Pristis clavata*) and the vulnerable Freshwater Sawfish (*Pristis Microdon*), now known as Largetooth Sawfish (*Pristis pristis*). The methodology of the baseline surveying program must be developed in consultation with the IRG. Surveys must be conducted over a period of 3 years and must be undertaken in the four Keep River pools (K1, K2, K3 and K4) and at least three sites in the Keep River estuary. | Compliant.<br><br>Completed. | Baseline aquatic fauna surveys of the Keep River were completed prior to the commencement of farming on the Weaber Plain, under EPBC 2010/5491. Post-development aquatic fauna surveys of the Keep River were undertaken by Indo-Pacific Environmental Pty Ltd under the oversight of the IRG, in relation to the Weaber Plain (Goomig) development impacts, as previously reported.<br><br>Keep River aquatic fauna surveying was undertaken for DPIRD in 2025, as a consequence of dry seasonal rain and stormwater runoff. Toxicant detections in the Keep River were not attributable to KAI.<br><br>**Evidence items:**<br>2025.KEMP.31a Goomig-Knox Surface Water Report to IRG<br>2025 EPBC 2014-7143 Condition 14 – IRG Meeting Agenda – 10 April 2025<br>2025 EPBC 2014-7143 Condition 14 – IRG Agenda Items – 25 February 2026 (includes April 2025 minutes)<br>2025 EPBC 2014-7143 Condition 15 – Ecological Health, Sawfish Survey and Assessment 2025 |
| **15B(ii)** | An outcome-based risk assessment which is based on data collected during the baseline monitoring program and other relevant data to determine the potential risks | Compliant. | The outcome-based risk assessment (WRM, 2015) completed under the requirements of the Weaber Plain (Goomig) EPBC approval 2010/5491 is considered to have met the initial requirements of this sub-condition. |

| Condition Reference | Requirement | Is the Project compliant with this condition? | Evidence / Comments |
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| | to the listed threatened species named in Condition 15.B.i above as well as for the listed vulnerable Green Sawfish (*Pristis zijsron*) and the listed migratory Australian Snubfin Dolphin (*Orcaella heinsohm)* and Indo Pacific Humpback Dolphin (*Sousa chinensis*), at an individual and local population level. | | The IRG reviews monitoring data and exceedances of triggers in the Keep River, in relation to their potential impacts on listed MNES.<br><br>**Evidence items:**<br>2025.KEMP.31a Goomig-Knox Surface Water Report to IRG<br>2025 EPBC 2014-7143 Condition 14 – IRG Meeting Agenda – 10 April 2025<br>2025 EPBC 2014-7143 Condition 14 – IRG Agenda Items – 25 February 2026 (includes April 2025 minutes)<br>2025 EPBC 2014-7143 Condition 15 – Ecological Health, Sawfish Survey and Assessment 2025 |
| **15B(iii)** | Seasonal, site-specific baseline water quality and flow trigger values for the Keep River listed threatened and migratory species determined with reference to the ANZECC guidelines and the advice of the IRG. Until trigger values are established with the advice of the IRG, ANZECC guidelines trigger values for systems with high conservation/ecological value (as defined in the ANZECC guidelines) must be used. Sample analytes must also be determined with the advice of the IRG. | Compliant. | The IRG-informed water quality triggers contained within the '*Goomig Stormwater Discharge Monitoring and Management'* document are applied to the Knox Plain.<br><br>**Evidence items:**<br>2025.KEMP.93a Goomig Stormwater Discharge Monitoring and Management – Interim Management Approach.<br>2025.KEMP.31a Goomig-Knox Surface Water Report to IRG<br>2025 EPBC 2014-7143 Condition 14 – IRG Meeting Agenda – 10 April 2025<br>2025 EPBC 2014-7143 Condition 14 – IRG Agenda Items – 25 February 2026 (includes April 2025 minutes) |
| **15B(iv)** | A monitoring program for the Keep River, Keep River pools, on the Development Area, and of relevant groundwater sites and parameters to be undertaken to monitor water quality and flow with the purpose of enabling early detection of changes so that corrective action can be taken to ensure that trigger values are not exceeded during construction and operation. | Compliant. | Keep River monitoring is undertaken as reported by DPIRD through the Weaber Plain approvals. Reporting is provided by DPIRD to the Weaber Plain IRG.<br><br>**Evidence items:**<br>2025.KEMP.93a Goomig Stormwater Discharge Monitoring and Management – Interim Management Approach.<br>2025.KEMP.31a Goomig-Knox Surface Water Report to IRG<br>2025 EPBC 2014-7143 Condition 14 – IRG Meeting Agenda – 10 April 2025<br>2025 EPBC 2014-7143 Condition 14 – IRG Agenda Items – 25 February 2026 (includes April 2025 minutes) |
| **15B(v)** | A method or mechanism for predicting, modelling and/or monitoring the water quality of the seasonal first flush of water capable of detecting water quality trigger levels for listed threatened and migratory species, | Compliant. | The Keep River water quality monitoring plan and management response requirements overseen by the IRG are applied to the Knox Development in unison with the Goomig development.<br><br>**Evidence items:** |

| Condition Reference | Requirement | Is the Project compliant with this condition? | Evidence / Comments |
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| | developed in consultation with the IRG. This may include onsite monitoring. | | 2025.KEMP.93a Goomig Stormwater Discharge Monitoring and Management – Interim Management Approach.<br>2025.KEMP.31a Goomig-Knox Surface Water Report to IRG<br>2025 EPBC 2014-7143 Condition 14 – IRG Meeting Agenda – 10 April 2025<br>2025 EPBC 2014-7143 Condition 14 – IRG Agenda Items – 25 February 2026 (includes April 2025 minutes) |
| **15B(vi)** | A targeted aquatic fauna monitoring program to be undertaken during construction and operation to measure the success of management measures to inform an adaptive management approach. | Compliant. | **Evidence item**<br>2025 EPBC 2014-7143 Condition 15 – Ecological Health, Sawfish Survey and Assessment 2025 |
| **15B(vii)** | Details of management objectives, management actions, performance standards, corrective actions should trigger values be reached, adaptive management and contingency measures to mitigate impacts on listed threatened and migratory species in the Keep River from changes to flow, water quality from surface water, stormwater and groundwater during construction and operation. | Compliant. | The advice of the Weaber Plain IRG in relation to this sub-condition applies to the Knox development. The performance objectives, management responses, standards and actions developed and adopted in relation to EPBC 2010/5491 are applied to the Knox operations under EPBC 2014/7143.<br><br>**Evidence cited in previous reporting:**<br>EPBC 2014-7143 DPIRD 2023b *Goomig Stormwater Discharge Monitoring and Management – Interim Management Approach*.<br><br>**Evidence items:**<br>2025.KEMP.93a Goomig Stormwater Discharge Monitoring and Management – Interim Management Approach.<br>2025.KEMP.31a Goomig-Knox Surface Water Report to IRG<br>2025 EPBC 2014-7143 Condition 14 – IRG Meeting Agenda – 10 April 2025<br>2025 EPBC 2014-7143 Condition 14 – IRG Agenda Items – 25 February 2026 (includes April 2025 minutes) |

*Table 4. List of EPBC 2014/7143 Evidence Cited*

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| 2025 EPBC 2014-7143 Condition 2 - Keep Farming Reponse to DCCEEW |
| 2025 EPBC 2014-7143 Condition 3 - Annual Environment Report 2024 Lodgement Email to DCCEEW.pdf |
| 2025 EPBC 2014-7143 Condition 3 - Confirmation of Knox AER upload to KAI website.pdf |
| 2025 EPBC 2014-7143 Condition 3 - Knox Creek Plain Annual Report 2024 signed.pdf |
| 2025 EPBC 2014-7143 Condition 10 - FPDP Approval Letter to DPIRD from EPA.pdf |
| 2025 EPBC 2014-7143 Condition 10 - Knox Creek Plain FPDP Approved October 2025.pdf |
| 2025 EPBC 2014-7143 Condition 10 - Knox Creek Plain FPDP P3 Outlet Amendment March 2026 |
| 2025 EPBC 2014-7143 Condition 14 - Goomig-Knox Joint IRG - Draft Terms of Reference.pdf |
| 2025 EPBC 2014-7143 Condition 14 - IRG Agenda Items - 25 February 2026.pdf |
| 2025 EPBC 2014-7143 Condition 14 - IRG Meeting Agenda - 10 April 2025.pdf |
| 2025 EPBC 2014-7143 Condition 15 - Ecological Health, Sawfish Survey and Assessment 2025.pdf |

*Table 5. List of Knox EMP Evidence Cited*

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|---|
| 2025.KEMP.00 Keep Farming Compliance Inspection Report 2025-06-20.pdf |
| 2025.KEMP.2a Knox Plains Environmental Induction. version 3. 2025.pdf |
| 2025.KEMP.2b Worker Induction Document version 3.pdf |
| 2025.KEMP.2c Contractor Induction 2025.pdf |
| 2025.KEMP.3a Incident Report P3 Outlet Realignment Keep Farming 2025-12-11 SIGNED copy.pdf |
| 2025.KEMP.19a Knox Soil Monitoring Site Locations.jpg |
| 2025.KEMP.19b CSBP_Lab_250725_Enviro_001.pdf |
| 2025.KEMP.19c CSBP_Lab_250725_Enviro_002.pdf |
| 2025.KEMP.23a Chemical Storage - Locked 2025-06-20.jpg |
| 2025.KEMP.23b Chemical Storage - Open 2025-06-20.jpg |
| 2025.KEMP.24a Hydrocarbon Storage 2025-06-20.jpg |
| 2025.KEMP.24b Bunded diesel storage 2025-06-20.jpg |
| 2025.KEMP.25a Self-bunded generator on concrete pad |
| 2025.KEMP.26a MSDS file in lunch area of workshop 2025-06-20.jpg |
| 2025.KEMP.26b SDS File 2025-06-20.jpg |
| 2025.KEMP.27a Jack Hawkins PACHE87497 - AQF3 SOA.pdf |
| 2025.KEMP.31a Goomig-Knox Surface Water Report to IRG 2025.pdf |
| 2025.KEMP.41a Drum Muster receipt 18.06.2025.pdf |
| 2025.KEMP.43a Buffer condition report for Goomig and Knox 2025 |
| 2025.KEMP.54a Goomig-Knox Weed Survey Report 2025.pdf |
| 2025.KEMP.84a Knox Groundwater Monitoring Field Records 2025 |
| 2025.KEMP.84b 2023 Groundwater bores - Stressors and pesticides.pdf |
| 2025.KEMP.84c 2023 Groundwater bores - Metals.pdf |
| 2025.KEMP.91a Goomig Groundwater modelling project commencement notice |
| 2025.KEMP.93a Goomig Stormwater Discharge Monitoring and Management - Interim Management Approach.pdf |
| 2025.KEMP.100a IRG Agenda Items - 10 April 2025.pdf |
| 2025.KEMP.100b 2025-2026 Farm Chemical Lists - Calendar for IRG.pdf |
| 2025.KEMP.105a Knox Creek Plain Final Project Design Plan 2025-09-05 - APPROVED.pdf |
| 2025.KEMP.107a DRAFT Goomig and Knox Stormwater and Aquatic Fauna Management Plan.pdf |
| 2025.KEMP.108a IRG Agenda Items - 25 February 2026.pdf |
| 2025.KEMP.110a Ecological Health, Sawfish Survey and Assessment 2025.pdf |
| 2025.KEMP.132a Knox Plain Fire Management Guide 2025.pdf |
| 2025.KEMP.132b Keep Farming Response to DCCEEW Notice - October 2025.pdf |
| 2025.KEMP.170a Knox Proponent Activity Notice - MG Corporation.pdf |

Documents can be provided on request.

# 4.0 Correcting non-compliances

**Condition 12B**
*"The person taking the action must implement the action in accordance with Sections 10 and 11 of the* Knox Creek Plain Environmental Management Program*, August 2015."*

EMP actions 6, 112, 113, 119 and 120 all have potential non-compliances assigned, due the stormwater outlet actual versus design footprint differences.

Condition 12B has a partial (potential) non-compliance relating to clearing outside of the approved stormwater drainage path in late 2025 (noting that the footprint cleared of 2.57ha was less than the WA EPA-approved 2.99ha, with only part of the clearing being outside of the approved footprint). To permanently remedy this potential non-compliance, Keep Farming has submitted an amendment to the WA EPA-approved Knox Final Project Design Plan (FPDP). This amendment and incident details are included in evidence under Condition 10. There is no significant or material impact arising from this matter.

Once the amendment is approved by the WA EPA, a request to vary the Knox development footprint under EPBC 2014/7143 will be forwarded to DCCEEW. *The actual development footprint is smaller than the EPBC 2014/7143 approved development area.* It is noted that the FPDP approved by the WA EPA aligns with the *Typhonium sp. kununurra* offset and protection requirements of the WA Department of Biodiversity, Conservation and Attractions (DBCA).

**Condition 15A**
"*The person taking the action must implement the action in accordance with Sections 7, 8 and 9 of the* Knox Creek Plain Environmental Management Program August 2015, *to minimise impacts on listed threatened and migratory species in the Keep River*".

Knox EMP section 8 is the Groundwater Management Sub-Plan. EMP actions 83, 84 and 91 all have potential non-compliances assigned in relation to groundwater.

A potential non-compliance arises due to revised modelling not being completed. The modelling update will be remedied following DPIRD's completion of the Goomig modelling, which is part of the same aquifer system. Modelling will also be affected by the (currently unknown) impact of the proposed adjacent Sweetwater agricultural development, which is under assessment as EPBC 2025/10235.

A further potential non-compliance arises from the requirement to increase the high intensity monitoring bores. Keep Farming is in discussion with DPIRD regarding the replacement of bores which were no longer operationally pragmatic; the installation of additional monitoring bores; and the inclusion of additional data loggers to meet the requirements of the Knox EMP Groundwater Management Sub-plan, and therefore compliance with Condition 15A.

# 5.0 New environmental risks

New environmental risks and matters for consideration include the following:

- Both Keep Farming and KAI acknowledge the extension to the Threatened Species Scientific Committee (TSSC) assessment of *Typhonium sp. kununurra* for MNES listing under the EPBC Act. Both parties will continue to work with regulators to minimise impacts on this species.
- Keep Farming and KAI are aware of the proposed Sweetwater development of the adjacent Northern Territory portions of the Knox Plain (EPBC 2025/10235). This will have cumulative impact on groundwater responses, reference bore locations, stormwater flows and water quality in the Keep River.

# 7.0 References


Bell, R., Lillicrap, A., and George, R., 2024, Goomig Farmlands: Review and Analysis of Groundwater Monitoring Undertaken from 2014 to 2023. Report to the Independent Review Group (IRG). DPIRD, Perth.

Department of Primary Industries and Regional Development, 2023a, Threatened Species Management Plan Version 1. *Typhonium sp. kununurra.* March 2023. DPIRD, Perth.

Department of Primary Industries and Regional Development, 2023b, Goomig Stormwater Discharge Monitoring and Management (EPBC 2010/5491) Interim Management Approach. Unpublished. DPIRD, Kununurra.

Department of Primary Industries and Regional Development, 2023c, Keep River 2022-2023 Water Quality Monitoring and Management Report. Unpublished. DPIRD, Kununurra.

Department of Primary Industries and Regional Development, 2023d, *Statement 938 Compliance Assessment Report 2023*. DPIRD, Kununurra.

Indo-Pacific Environmental Pty Ltd, 2022, ORIA Stage II Expansion Post-Development Keep River Aquatic Fauna and Target Sawfish Survey 2021. Prepared for the Department of Primary Industries and Regional Development, Perth.

*Indo-Pacific Environmental, 2023, ORIA Stage II Expansion Post Development Keep River Aquatic Fauna & Targeted Sawfish Survey – 2022, Revision C, 16 February 2023.* Prepared for the Department of Primary Industries and Regional Development, Perth.

Kimberley Boab Consulting, 2015, *Knox Creek Plain Environmental Management Program August 2015*. Prepared for Kimberley Agricultural Investment Pty Ltd, Kununurra.

Kimberley Boab Consulting, 2016, *Knox Creek Plain Aquatic Fauna Management Plan*. Prepared for Kimberley Agricultural Investment Pty Ltd, Kununurra.

Kimberley Boab Consulting, 2019, *Knox Creek Plain Final Project Design Plan REV C.* Prepared for the Department of Primary Industries and Regional Development, WA.

Kimberley Boab Consulting, 2022, EPBC 2014/7143 Knox Creek Plain Annual Report 2021. Prepared for Kimberley Agricultural Investment Pty Ltd.

Kimberley Boab Consulting, 2022, EPBC 2010/5491 Annual Environment Report 1 May 2021 to 30 April 2022. Prepared for Department of Primary Industries and Regional Development.
Available at - https://www.wa.gov.au/system/files/2022-11/2010-5491%20Annual%20Environment%20Report%20May%202021%20to%20April%202022%20-%20Signed.pdf

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Kimberley Boab Consulting, 2025, *EPBC 2014/7143 Knox Creek Plain Annual Report 2024*. Prepared for Kimberley Agricultural Investment Pty Ltd.

Specialised Zoological, 2022, Detecting the Bare-rumped Sheath-tailed Bat at Knox Plains, Western Australia. Prepared for the Department of Primary Industries and Regional Development, 4 July 2022, project reference SZ607.

# APPENDIX A – Knox Creek Plain EMP Compliance Assessment 2025

*Appendix A Table 1. Soil Conservation Management Actions*

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 1 | Provide an Information Package to the owner/leaseholder, which outlines:<br>• the susceptibility of soil from disturbed areas to erosion from high intensity rainfall during the wet season.<br>• soil erosion prevention measures.<br>• irrigation strategies to reduce potential impacts of sodicity and salinity.<br>• procedures to monitor soil salinity and sodicity. | To reduce the potential for agricultural practices to result in erosion by ensuring prospective landowners are aware of the appropriate risks and management measures. | At sub-lease/sale of lots | Not applicable | CLD | Item assessed as **completed** in a previous audit period (KBC 2022). |
| EMP 2 | Induct construction personnel on soil erosion control management measures. | To reduce the potential for construction activities to result in erosion by ensuring construction personnel are aware of appropriate management measures. | Within one week of personnel commencing work on-site | 2025.KEMP.00<br>2025.KEMP.2a<br>2025.KEMP.2b<br>2025.KEMP.2c | C | Induction documentation includes erosion.<br><br>Senior DPIRD staff completed Keep Farming's environmental induction alongside Goomig-Knox Independent Review Group members (EPBC 2010/5491) prior to a site visit on 10 April 2025. This involved a PowerPoint presentation and information package addressing health, safety and environmental requirements.<br><br>DCCEEW staff completed the visitor induction on 25 June 2025. |
| EMP 3 | Maintain records of ground disturbing activities that include the date that the boundary of clearing was delineated, the date of clearing and location of topsoil storage. | To provide data to inform management. | During construction of shared infrastructure | 2025.KEMP.3a | C | Note that the timing of this action is for the period **during the construction of shared infrastructure** (roads, main feeder channels and shared drainage networks), and that Keep Farming is not constructing shared infrastructure. An in-situ footprint modification at the central stormwater outlet extended beyond the approved buffer impact area in October 2025. This is a PNC per EMP 6, but is not recorded as PNC here due to the staging inconsistency ("construction of shared infrastructure" indicating the timing for this line item is pre- farm development). Nevertheless, the stormwater outlet clearing records are included in item 2025.KEMP.3a. A shapefile of the disturbance area has been provided to DPIRD by Keep Farming, in conjunction with the incident report. |
| EMP 4 | Restrict ground-disturbing activities to the dry season wherever practicable. | To prevent ground-disturbing activities when the risk of erosion is high. | During construction of shared infrastructure | 2025.KEMP.3a | C | Clearing for the Knox central stormwater outlet was completed in October-November 2025. |
| EMP 5 | Ensure a drainage management system that includes a sediment trap is in place around all borrow pits. | To reduce the potential for erosion of borrow pits to result in adverse environmental impacts. | Prior to ground disturbance | Not required 2025 | NR | No borrow pits are currently in place on Knox. |
| EMP 6 | Delineate the boundaries of the vegetation to be cleared for | To minimise erosion by preventing unauthorised ground disturbance. | Prior to ground disturbance | 2025.KEMP.3a | PNC | Refer to attached incident report relating to the construction of the central stormwater outlet (2025.KEMP.3a). The as-constructed location of the stormwater outlet was misaligned to the approved area, but nevertheless |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| | construction in the field with flagging tape, signage or fencing. | | | | | the footprint cleared was smaller than that approved. This occurred due to site conditions indicating a drainage pathway which varied slightly from the planned route. |
| EMP 7 | Stage clearing of vegetation so that areas are cleared only as required | To reduce the potential for erosion by minimising the area of ground surface exposed at any one time, to allow native animals the chance to move on. | During construction of shared infrastructure | Not required / not applicable | C | Noting that the timing of this action is for the period **during the construction of shared infrastructure** (roads, main feeder channels and shared drainage networks), and that Keep Farming is not constructing shared infrastructure, the action is nevertheless compliant as vegetation is only cleared as required |
| EMP 8 | Restrict movement of construction machinery and equipment to designated tracks and roads. | To prevent unauthorised ground disturbance. | During construction of shared infrastructure | Not required / not applicable | NR | The timing of this action is for the period **during the construction of shared infrastructure** (roads, main feeder channels and shared drainage networks). Keep Farming is not constructing shared infrastructure, and construction machinery is required in-field for farm development. |
| EMP 9 | Maintain records of topsoil stockpiles that include the location of stockpile and location of where topsoil was removed from. | To ensure topsoil is utilised in the most appropriate locations. | During construction of shared infrastructure | Not required / not applicable | NR | Refer to **EMP 8**. |
| EMP 10 | Remove topsoil from:<br>• all areas to be excavated,<br>• all areas where spoil from excavation is to be stored. | To provide a natural source of seed, organic matter and microorganisms for areas to be rehabilitated. | During construction of shared infrastructure | Not required / not applicable | NR | Refer to **EMP 8**. |
| EMP 11 | Stockpile cleared topsoil and subsoil separately, away from irrigation channels, for later use in rehabilitation in accordance with the Rehabilitation Management Sub-plan | To provide a natural source of seed, organic matter and microorganisms for areas to be rehabilitated. | During construction of shared infrastructure | Not required / not applicable | NR | Refer to **EMP 8**. |
| EMP 12 | Install topsoil containment measures such as sediment fencing around stockpiles. | To reduce potential for erosion of topsoil stockpiles. | During construction of shared infrastructure | Not required / not applicable | NR | Refer to **EMP 8**. |
| EMP 13 | Install signage to prevent unauthorised access to the buffer in accordance with the Buffer Management Sub-plan. | To prevent damage to the buffer from unauthorised access. | Prior to ground disturbance | DPIRD evidence item 2024.EMP2a | C | Refer to DPIRD evidence item 2024.EMP2a – File note of site inspection – Knox – 16 April 2025 |
| EMP 14 | Rehabilitate areas disturbed as a result of construction that are no longer required post-construction in accordance with the Rehabilitation Management Sub-plan. | To maximise the potential for successful rehabilitation. | As specified in the Rehabilitation Management Sub-plan | Not applicable | NR | There are no disturbed areas on Knox that are not required post-construction. Keep Farming limits disturbance to permanently required areas. The future (proposed) borrow pit will have its own rehabilitation management plan, under *Mining Act 1978* (WA) closure requirements. |

*Appendix A Table 2. Soil monitoring regime.*

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| EMP 15 | Soil erosion within 50m of construction activities. | Weekly during construction of shared infrastructure | No soil erosion occurring as a result of construction activities. | 1. Investigate cause of erosion.<br>2. Investigate ways to minimise erosion and increase landform stability.<br>3. Implement remedy.<br>4. Monitor success of remedy. | Not required / not applicable | NR | The timing of this action is for the period **during the construction of shared infrastructure** (roads, main feeder channels and shared drainage networks). Nevertheless, Keep Farming monitors erosion during construction, as erosion is counter to the purpose of the construction.<br>The auditor observed records of erosion inspections following the 2025 wet season. |
| EMP 16 | Management of topsoil stockpiles. | Weekly during construction of shared infrastructure | Topsoil stockpiles are being managed appropriately, including no indication of erosion present. | 1. Investigate cause of erosion.<br>2. Investigate ways to minimise erosion and increase landform stability.<br>3. Implement remedy.<br>4. Monitor success of remedy. | Not required / not applicable | NR | The timing of this action is for the period **during the construction of shared infrastructure** (roads, main feeder channels and shared drainage networks). Topsoil is not stockpiled. |
| EMP 17 | Extent of clearing and ground disturbance along pre-defined boundaries. | Weekly during construction of shared infrastructure | No clearing or disturbance outside of pre-defined boundaries (Figure 2). | 1. Report as Environmental Incident and initiate Incident Procedure | 2025.KEMP.3a | NR | The timing of this action is for the period **during the construction of shared infrastructure** (roads, main feeder channels and shared drainage networks). Nevertheless, the stormwater outlet alignment incident was reported per 2025.KEMP.3a. |
| EMP 18 | Soil erosion within 50 m of infrastructure (including roads, channels, sediment basins and hillside drains). | As required after construction, for example after significant rainfall events. | Landform is safe and stable with no soil erosion occurring as a result of runoff from infrastructure. | 1. Investigate cause.<br>2. Identify ways to reduce erosion from infrastructure such as reducing runoff velocity, diverting runoff and application of hydromulch to areas identified as susceptible to erosion from runoff.<br>3. Implement remedy.<br>4. Monitor success of remedy. | 2025.KEMP.00<br><br>Other site inspections:<br>DPIRD April 2025<br>DCCEEW June 2025 | C | No evidence of significant erosion was observed during site inspections. Keep Farming monitors erosion after rainfall events and restores landforms accordingly to maximise farm efficiency and minimise environmental risk. |
| EMP 19 | Surface and subsoil electrical conductivity within the project area, with a specific focus on areas with Aquitaine clay soils, including:<br>• at least one sample from each lot<br>• a representative spread of sites throughout the Buffer Area. | Twelve monthly, commencing prior to clearing and at the end of each dry season during operation of irrigation infrastructure. | Salinity levels do not exceed 400 mS/m in surface or subsurface soils. | 1. Map the distribution of soil with salinity exceeding target levels.<br>2. Investigate cause (which could include determining if salinity is due to a rise in the groundwater or whether the soil chemical status is deteriorating from insufficient irrigation).<br>3. Verify the adequacy of the estimated leaching rate (approximately 100 mm/a) in controlling sodicity in accordance with the Groundwater Management Sub-plan.<br>4. Identify whether remedial action is required, such as installation of field drains in accordance with the Groundwater Management Sub-plan.<br>5. Implement remedial action on a trial basis in areas identified from mapping. | 2025.KEMP.19a<br>2025.KEMP.19b<br>2025.KEMP.19c | C | The original timing requirement of this action was referenced due to the end of the dry season being the end of cropping. That is no longer the case. July is the end of the cotton season (mid- dry season). Soil sampling was undertaken in July 2025, at 100mm (topsoil) and 600mm (subsoil) depths.<br><br>Buffer and farm locations are included in the monitoring sites.<br><br>No samples exhibited soil salinity exceeding 400mS/m. |

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| | | | | 6. Monitor success of remedy, increasing the frequency of soil monitoring if salinity exceeds target levels. | | | |
| EMP 20 | Surface and subsoil ESP and pH within the project area, with a specific focus on areas with Aquitaine clay soils, including:<br>• at least one sample from each lot<br>• a representative spread of sites throughout the Buffer Area. | Twelve monthly, commencing prior to clearing and at the end of each dry season during operation of irrigation infrastructure. | Sodicity levels five years after commencement of irrigation do not exceed an ESP of 6 in surface soils or 15 in subsurface soils. | 1. Map the distribution of soil with sodicity exceeding target levels.<br>2. Investigate cause (which could include determining if changes are consistent with the anticipated initial response to land use change, or whether the soil chemical status is deteriorating as a result of insufficient irrigation).<br>3. Verify the adequacy of the estimated leaching rate (approximately 100 mm/a) in controlling sodicity in accordance with the Groundwater Management Sub-plan.<br>4. Identify whether remedial action is required, such as application of gypsum or sulphur.<br>5. Implement remedial action on a trial basis in areas identified by mapping.<br>6. Monitor success of remedy, increasing the frequency of soil monitoring if salinity exceeds target levels. | 2025.KEMP.19a<br>2025.KEMP.19b<br>2025.KEMP.19c | C | Knox soil sampling site 4 exhibited an ESP of 15.0 at 600mm depth. This site is not yet irrigated. The reading indicates high sodicity risk, which is anticipated on dense clay soils.<br><br>Soil pH was monitored at all sites, at both depths. |

*Appendix A Table 3. Chemical management actions*

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 21 | Prospective land managers will be advised of the requirement to comply with procedures for chemical application, and chemical management legislation including:<br>• *Agricultural and Veterinary Chemicals Code Act 1994* (Cwth) and associated acts and regulations<br>• *Health (Pesticides) Regulations 2011*<br>• *Aerial Spraying Control Act 1966* (WA)<br>• *Agricultural Produce (Chemical Residues) Act 1983* (WA)<br>• *Poisons Act 1964* (WA)<br>• *Veterinary Preparations and Animal Feeding Stuffs Act 1976* (WA)<br>• *Agriculture and Related Resources (Spraying Restriction) Regulations 1979.* | To reduce the potential for contamination of the environment by farm chemicals by ensuring that farm owners/managers are aware of the specified procedures for chemical application in the project area and informed of their rights and responsibilities under the relevant Acts and Regulations. | At sub-lease of lots. | Copies of relevant agreements can be provided. | CLD | Keep Farming signed a development agreement with the WA Government in 2024. This document is commercial-in-confidence. Statutory obligations have been articulated. |
| EMP 22 | Induct personnel on safe use of chemicals and hydrocarbon management measures, including hydrocarbon handling, disposal, and spill response procedures. | To reduce the risk of contamination of the environment. | Within one week of personnel commencing work on site | 2025.KEMP.00<br>2025.KEMP.2a<br>2025.KEMP.2b<br>2025.KEMP.2c | C | Induction page 9 addresses chemical management and hydrocarbons. |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 23 | Ensure storage of farm chemicals complies with relevant Australian and Western Australian Standards, including AS 2507-1998 *"The storage and handling of agricultural and veterinary chemicals"* and Department of Water *Toxic and Hazardous Substances – Storage and Use WQPN No. 65.* | To prevent potential contamination of the environment and harm to individuals by ensuring appropriate storage and handling of chemicals. | Ongoing from commencement of ground disturbance | 2025.KEMP.00<br>2025.KEMP.23a<br>2025.KEMP.23b | C | Locked chemical storage observed in Knox workshop 20 June 2025. |
| EMP 24 | All hydrocarbons will be stored in accordance with the following:<br>• *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007* (WA)<br>• Australian Standard AS 1940-2004: The Storage and Handling of Flammable and Combustible Liquids. | To minimise the potential for hydrocarbon contamination of the environment. | Ongoing from commencement of ground disturbance | 2025.KEMP.00<br>2025.KEMP.24a<br>2025.KEMP.24b | C | Hydrocarbon storage observed during site inspection 20 June 2025. Storage areas bunded. *Compliance with the legislation listed has not been assessed. Compliance with the legislation is a statutory obligation.* |
| EMP 25 | Generators will be located on bunded platforms to contain any fuel leaks. | To minimise the potential for spills and leaks to contaminate the environment. | Ongoing from commencement of ground disturbance | 2025.KEMP.25a | C | Generators are bunded. Exampled in evidence item 2025.KEMP.25a |
| EMP 26 | Maintain appropriate spill response equipment and Material Safety Data Sheet (MSDS) information in all hydrocarbon storage and re-fueling areas and maintenance areas. | To minimise the potential for spills and leaks to contaminate the environment. | Ongoing from commencement of ground disturbance | 2025.KEMP.00<br>2025.KEMP.26a<br>2025.KEMP.26b | C | SDS file observed in lunch area of workshop, accessible to all staff. |
| EMP 27 | Persons designated as responsible for the storage and handling of fertiliser on farms be provided with appropriate training and instruction | To prevent potential contamination of the environment by ensuring appropriate storage and handling of fertilisers. | Ongoing from commencement of ground disturbance | 2025.KEMP.27a | C | Keep Farming's in-house agronomist is formally trained in the Transport and Storage of Chemicals (including fertiliser). |
| EMP 28 | Transport dangerous goods in accordance with the *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007* (WA). | To ensure dangerous goods are stored appropriately during transport (e.g. on absorbent material, provision of spill kit, well-ventilated, appropriate documentation and provision of personnel protection equipment for safe handling). | Ongoing from commencement of ground disturbance | Not applicable | Not assessed | This item deals with an activity outside the Project Area. This action reflects a statutory obligation. |
| EMP 29 | Notify the DPW AND/OR DER of hydrocarbon spills in accordance with the *Environmental Protection (Unauthorised Discharges) Regulations 2004*. | To ensure potential spills are appropriately assessed and remediated according to the *Environmental Protection (Unauthorised Discharges) Regulations 2004* as hydrocarbons are a Schedule 1 Material in these Regulations. | In accordance with Incident Response Procedure | 2025.KEMP.00 (for incident register) | C | No significant hydrocarbon spills warranting reporting were recorded in 2025. Minor spills are recorded in incident reports. Note that this action reflects a statutory obligation. |
| EMP 30 | Maintain registers of all chemicals applied on-site as required under applicable chemical usage legislation. | To provide data for review if monitoring indicates unacceptable impacts to the environment. | Ongoing from commencement of ground disturbance | 2025.KEMP.00<br>2025.KEMP.26a<br>2025.KEMP.26b | C | This action reflects a statutory obligation. |
| EMP 31 | Restrict chemical and fertiliser use when the tailwater retention capacity is unavailable | To prevent the transporting of nutrients and chemicals downstream | Ongoing from commencement of ground disturbance | 2025.KEMP.31a | C | The 2025 water monitoring report indicates no downstream chemical contamination, indicating the intent of this action has been met. Figure 2 of this document illustrates tailwater holding on Knox. |
| EMP 32 | Commercial pesticide and herbicide spraying will be undertaken only by operators with the appropriate level of ChemCert accreditation. | To minimise spray drift. | Ongoing from commencement of ground disturbance | 2025.KEMP.27a | C | Keep Farming's in-house agronomist is formally trained in chemical handling and application. |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 33 | Ensure agricultural chemicals are not directly applied to dedicated on-farm access tracks. | To prevent off-site transportation of chemicals in dust lift-off from access tracks. | Ongoing from commencement of ground disturbance | Site inspections – 2025. | C | The auditor saw no evidence of agricultural chemicals being directly applied to on-farm access tracks during multiple inspections and visits undertaken throughout 2025. |
| EMP 34 | Chemicals will be applied in accordance with the product label. | To prevent potential contamination of the environment by ensuring appropriate application of chemicals. | Ongoing from commencement of ground disturbance | 2025.KEMP.27a<br>2025.KEMP.31a | C | Application in accordance with the label is a statutory requirement.<br>Refer to EMP 93 and EMP 102 which deal with water quality outcomes. Knox is assessed as compliant with EMP 34 because of the water quality outcomes achieved. |
| EMP 35 | Maintain a register of all aerial spraying operations. | To minimise potential for environmental impacts by ensuring aerial spraying is carried out in an acceptable manner. | Ongoing from commencement of ground disturbance | Site inspection 2025. | C | This is a statutory obligation on the aerial spraying contractor. Farm chemical spray records are kept on site. |
| EMP 36 | Use accredited operators (e.g. by operators and pilots accredited under the Aerial Agricultural Association of Australia (AAAA) "Spraysafe" program) | To minimise potential for environmental impacts by ensuring aerial spraying is carried out in an acceptable manner, to determine extent of required spray fall-out monitoring. | Ongoing from commencement of ground disturbance | Site inspection 2025. | C | This is an obligation on the aerial spraying contractor. |
| EMP 37 | Notify neighbours within:<br>• 1500 m of an area to be sprayed with ultra-low volume,<br>• 750 m of an area to be sprayed with emulsifiable concentrate by air.<br>Consideration should be given to provide a range of dates in case conditions are not conducive to safely apply the pesticide and to minimise spray drift. | To minimise the risk of adverse health effects caused by spray fall-out. | Ongoing from commencement of ground disturbance | N/A | NR | There are no residential neighbours within 1500m of the Knox development. |
| EMP 38 | Design chemical washdown facilities in accordance with Department of Water, Water Quality Protection Notes on:<br>• Mechanical Equipment Washdown (WQPN No. 68)<br>• Chemical Blending (WQPN No. 7). | To minimise potential for environmental impacts by ensuring appropriate siting (location), design and construction of chemical wash down facilities. | Prior to commencement of planting of crops | Site inspection 2025.<br>2025.KEMP.00 | C | All machinery operated on site is subject to cleaning and handling in the workshop facilities (refer to images in 2025.KEMP.00) which contains concrete flooring and receptacles for 'unclean' materials for appropriate disposal (eg soils). Downstream water monitoring does not indicate chemical run-off from Keep Farming across a broad range of farm chemicals, indicating the outcome has been met. |
| EMP 39 | All chemical blending and decanting will be undertaken within a fully contained area. | To minimise potential for environmental impacts by ensuring chemical spills are contained. | Ongoing from commencement of irrigation | Site inspection 2025.<br>2025.KEMP.00<br>2025.KEMP.23a<br>2025.KEMP.23b | C | Chemical blending on site occurs on concrete flooring, with spill kits available at multiple locations. Downstream water monitoring does not indicate chemical run-off from Keep Farming across a broad range of farm chemicals, indicating the outcome has been met. |
| EMP 40 | Develop emergency response procedures in accordance with Department of Water, Water Quality Protection Note *Contaminant spills – emergency response (*WQPN No. 10). | For determining the appropriate level of response according to the degree (or classification) of the spill. | Prior to commencement of planting of crops | 2025.KEMP.2a | C | |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 41 | Dispose empty chemical containers in accordance with the AgSafe guidelines for disposal of containers. | To minimise potential for environmental impacts by minimising chemical residue in disposed chemical containers. | Ongoing from commencement of irrigation | 2025.KEMP.41a | C | Drum Muster receipt provided in 2025.KEMP.41a. |

*Appendix A Table 4. Chemical use monitoring regime*

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status Knox | Comment |
|---|---|---|---|---|---|---|---|
| EMP 42 | Inspection of permanent hydrocarbon storage facilities | Three monthly | All hydrocarbon storage devices comply with appropriate standards and/or regulations | 1. Non-compliant hydrocarbon storage devices to be replaced/repaired as appropriate. | 2025.KEMP.00 | C | |
| EMP 43 | Survey vegetation in the Buffer Area for symptoms of damage typical of chemicals being used in the ORIA | Annually | No detectable impact on the buffer | 1. Investigate the cause.<br>2. Investigation opportunities to prevent re-occurrences.<br>3. Inform farm owners of outcomes of the survey.<br>4. In the event of chemical discharge contrary to *Environmental Protection (Unauthorised Discharges) Regulations 2004*, report to DPW AND/OR DER. | 2025.KEMP.00<br>2025.KEMP.43a | C | Buffer vegetation condition assessment was undertaken in the Goomig and Knox buffer areas in July 2025. No damage from chemicals was recorded at the monitoring sites. |
| EMP 44 | Inspect storage facilities and mixing and washdown areas, and surrounds for chemical spills | Daily during spray operations<br>Monthly at other times | No chemical spills | • Implement emergency response.<br>• Classify appropriate response.<br>• Notify authorities if High or Moderate incident impact classifications.<br>• Review Emergency Response Plan (for High and Moderate incident impact classes).<br>• Prepare and implement follow-up environmental monitoring (in consultation with DPW AND/OR DER and DoW as required). | 2025.KEMP.00 | C | No evidence of chemical spills observed. |

*Appendix A Table 5. Dust and particulate management actions*

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 45 | Burning of vegetation will occur only at times when prevailing winds direct smoke and ash away from residential areas | To minimise the potential for smoke and ash to affect nearby residents | Ongoing from commencement of ground disturbance | Not applicable | NR | There are no residential areas near to Knox.<br><br>There is workers accommodation at Knox. Impacts on workers are a Keep Farming OHS responsibility. |
| EMP 46 | Provide prospective farm owners/lessees documentation on practices to prevent dust emissions | To reduce the potential for dust generation by minimising ground disturbance | At time of sub-lease | Previously completed. | CLD | The Knox Development Lease requires the Lessee to comply with the Knox Environmental Approvals, which include the Knox EMP. |
| EMP 47 | Proponent shall notify the nearby residences of construction activities and the predicted nature and duration of proposed burning activities | To reduce the potential for community impact by ensuring effective communication | As required | Refer to EMP45 | NR | Refer to EMP45 |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 48 | Cleared construction surfaces and stockpiles will be watered and/or stabilised where practicable to reduce dust lift-off | To reduce the potential for environmental and community impacts by reducing the potential for dust generation | During construction of shared infrastructure | Not applicable | NR | The timing of this action is for the period **during the construction of shared infrastructure** (roads, main feeder channels and shared drainage networks). |
| EMP 49 | Speed limits will be sign-posted and implemented in the project area and will reflect local conditions | To reduce the potential for environmental impacts by reducing the potential for dust generation | Ongoing from commencement of ground disturbance | 2025.KEMP.00<br>2025.KEMP.2a | C | Speed limits are sign-posted around the Knox operations centre and now also addressed at induction. There was no evidence of significant dust impacts to the environment outside the development area from multiple visits to the Knox development area during 2025. |

*Appendix A Table 6. Dust and particulate monitoring regime*

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status Knox | Comment |
|---|---|---|---|---|---|---|---|
| EMP 50 | Visual monitoring | Daily during construction of shared infrastructure | No offsite impact on amenity | • Investigate cause.<br>• Implement additional dust control measures, as appropriate. | Not applicable. | NR | The timing of this action is for the period **during the construction of shared infrastructure** (roads, main feeder channels and shared drainage networks). |
| EMP 51 | Monitor community issues associated with dust/burning | During construction of shared infrastructure | No public complaints relating to dust generated by the project | Public complaints will be recorded and responded to in accordance with the Community Issues Management Sub-plan. | Not applicable. | NR | The timing of this action is for the period **during the construction of shared infrastructure** (roads, main feeder channels and shared drainage networks).<br>Nevertheless, there were no complaints received by Keep Farming regarding dust emissions or burning in 2025. |

*Appendix A Table 7. Weed, plant pathogen and pest animal management actions*

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| KEMP 52 | Conduct a weed survey to establish baseline information (i.e. weed species and density/cover/distribution of weeds) and identify Priority Areas for management and control. Priority Areas will be defined by:<br>• weed infested areas (e.g. monocultures of neem trees, weed density/cover greater than 50%)<br>• areas that have declared noxious weed species and Weeds of National Significance (WONS)<br>• areas declared as local priority in consultation with DPaW, DAFWA and Ord Land and Water Inc. | To provide data to inform management. | Prior to ground disturbance | Not applicable | CLD | Baseline weed survey was undertaken by Ord Land and Water in 2015. Refer to Ord Land and Water (2015) *Knox Creek Weed and Vegetation Condition Assessment 2015*, unpublished report. This item was assessed as complete at that time. |
| EMP 53 | Establish permanent weed survey transects within 100 m into the Weaber Plain Buffer Area. | To ensure repeatability of ongoing weed monitoring. | Prior to ground disturbance | Not required | CLD | DPIRD re-established the permanent weed transects in September and October 2023. |
| EMP 54 | Conduct weed surveys along permanent weed survey transects (and opportunistically between permanent weed survey transects) to establish baseline information (i.e. weed species and density/cover/distribution of weeds) and identify and update Priority Areas for management and control. Priority Areas will be defined by: | To provide data to inform management. | Annually, from commencement of ground disturbance | 2025.KEMP.54a | C | Weed surveys were conducted along permanent weed transects in October 2025. |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| | • weed infested areas (e.g. monocultures of neem trees, weed density/cover greater than 50%)<br>• areas that have declared noxious weed species and Weeds of National Significance (WONS)<br>• areas declared as local priority in consultation with DPW AND/OR DER, DAFWA and Ord Land and Water Inc. | | | | | |
| EMP 55 | Update the extent of Priority Areas which will be defined by:<br>• weed infested areas (e.g. monocultures of neem trees, weed density/cover greater than 50%)<br>• areas that have declared noxious weed species and Weeds of National Significance (WONS)<br>• areas declared as local priority in consultation with DPW AND/OR DER, DAFWA and Ord Land and Water Inc. | To provide data to inform management. | Annually, from commencement of ground disturbance | Refer to EMP54 | C | Priority areas for weed management are identified in the weed monitoring report. |
| EMP 56 | Develop and undertake a weed control program in Priority Areas, except roads. | To ensure effective control of weeds by the appropriate parties. | Prior to ground disturbance | 2025.KEMP.00 | C | Weed control (esp. Parkinsonia) observed during site inspections in June 2025. Refer to site inspection report 2025.KEMP.00 |
| EMP 57 | Implement an induction program for personnel which contains information on:<br>• hygiene procedures for all vehicles, machinery and equipment upon entering and leaving the Weaber Plain Development Area and/or Priority Areas<br>• specific soil management requirements in Priority Areas<br>• requirement to remain within designated clearing areas. | To reduce the risk of construction activities introducing and/or spreading weeds and plant pathogens by ensuring construction personnel are aware of appropriate management measures and requirements. | Within one week of personnel commencing work on-site | 2025.KEMP.00<br>2025.KEMP.2a | C | Vehicle hygiene and weed management included on page 6 of induction. Unauthorised buffer access is addressed on page 4 of the induction. |
| EMP 58 | Prepare guidelines for prospective farmers/lessees that contains information on:<br>• vehicle hygiene measures (e.g. issues of using machinery from southern WA or interstate)<br>• identification, control and reporting of weeds (e.g. weed control in tail water ditches, use of fire)<br>• identification and reporting of pest animals, declared noxious weed species and signs of plant pathogens<br>• obligations under the *Agricultural and Related Resources Protection Act 1976* (WA) (including the requirement for the occupier of any private land to control declared plants and declared animals on and in relation to that land)<br>• selection of pet animals (e.g. discourage cat ownership)<br>• selection of crops (e.g. no declared noxious weed species) | To reduce the risk of agricultural activities introducing and/or spreading weeds, plant pathogens and pest animals by ensuring farm owners/managers are aware of appropriate management measures and requirements. | At time of sub-lease | Not applicable | CLD | The Knox Development Lease requires the Lessee to comply with the Knox Environmental Approvals, which include the Knox EMP. |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| | • irrigation and drainage of land (i.e. no water from farming allotments directed into the Weaber Plain Buffer Area). | | | | | |
| EMP 59 | | | | Not applicable | N/A | Item not included in Knox EMP |
| EMP 60 | | | | | N/A | Item not included in Knox EMP |
| EMP 61 | Aquatic weed control shall be undertaken consistent with industry standards | To reduce the risk of aquatic weeds being introduced into/ spread throughout natural watercourses and wetlands near the project area. | Ongoing from commencement of irrigation | | C | Aquatic weed control is undertaken in the M2 irrigation channel.<br>Evidence of aquatic weeds is monitored in conjunction with the water quality monitoring program which is undertaken via DPIRD. |
| EMP 62 | Restrict movement of vehicles and machinery to the limits of the areas to be cleared (thus not affecting the Weaber Plain Buffer Area) by delineating the Weaber Plain Buffer Area (e.g. fence, flags and signs) prior to clearing. | To reduce the risk of weeds being introduced into/ spread throughout the Buffer Area by limiting access. | Ongoing from commencement of ground disturbance | Not applicable. | NR | Action refers to Weaber Plain.<br>Knox stormwater outlet construction buffer incident discussed under item EMP6 and in evidence item 2025.KEMP.3a. |
| EMP 63 | Access into the Weaber Plain Buffer Area will be via designated access tracks only. | To reduce the risk of weeds being introduced into/ spread throughout the Buffer Area by limiting access. | Ongoing from commencement of ground disturbance | Site inspection 20 June 2025.<br>2025.KEMP.00 | C | Action refers to Weaber Plain.<br>Buffer areas area accessed by authorised personnel only via designated access tracks. |
| EMP 64 | | | | Not applicable | N/A | Item not included in Knox EMP. |
| KEMP 65 | Clean down all large machinery entering the Knox Creek Plain Development Area for the first time, to remove vegetative matter, seeds and soil. Each vehicle will be given a 'hygiene sticker' indicating that they have been checked and assessed for hygiene performance. | To prevent the introduction/ spread of weeds and plant pathogens in the project | During construction of shared infrastructure | Not applicable | NR | The timing of this action is for the period **during the construction of shared infrastructure** (roads, main feeder channels and shared drainage networks). Machinery on site on Knox is now permanently located. First entry clean-downs are required as part of biosecurity obligations for any machines transported from interstate. |
| EMP 66 | | | | Not applicable | N/A | Item not included in Knox EMP |
| EMP 67 | | | | Not applicable | N/A | Item not included in Knox EMP |
| EMP 68 | Certify all soil and fill material sourced from outside the project area as disease and weed free in accordance with DAFWA and DPW AND/OR DER requirements. If certificates cannot be obtained a risk assessment will be carried out on the soil material and only material that is evaluated as a very low risk of having environmental or declared noxious weeds or plant pathogens will be permitted for use. | To prevent the introduction/ spread of weeds and plant pathogens in the project area. | Ongoing from commencement of ground disturbance | Not applicable | C | No materials are imported from outside of the Knox and adjacent Weaber (Goomig) development areas. Area 11 (Goomig) material is considered low risk due to the proximity of the borrow pit. |
| EMP 69 | Inspect borrow pits and borrow pit access tracks prior to disturbance to ensure weed species are not present. If any weeds are present, they will be cleared and controlled (e.g. physical removal, spray, disposal off-site, burning) from the affected areas prior to commencement of borrow extraction. | To prevent the introduction/ spread of weeds and plant pathogens in the project area. | Prior to ground disturbance | Refer to EMP 68 | NR | Refer to EMP 68<br><br>There are presently no borrow pits in the Knox Creek Plain development area or buffer. |
| EMP 70 | Rehabilitate disturbed areas that are not to be utilised post-construction in accordance with the Rehabilitation Management Sub-plan. | To re-establish native vegetation and reduce and control weed cover. | During construction of shared infrastructure | Refer to EMP 162 to 165 | NR | There are no construction disturbance areas requiring rehabilitation on Knox. All laydown and other areas associated with infrastructure construction are within the permanent development area. |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 71 | Ensure that waste that may attract pest animals is properly disposed of in as far as is practicable. | To prevent the encouragement of pest animals by ensuring effective waste disposal. | Ongoing from commencement of ground disturbance | 2025.KEMP.00 | C | Refer to **2025.KEMP.00** for waste management images. |
| EMP 72 | Undertake pest eradication program within Buffer Area. | To reduce the risk of pest animals becoming established within the Buffer Area. | Ongoing from commencement of ground disturbance | Not assessable | Unable to assess | The Knox buffer area is being established in parallel with farm development. The revised Knox FPDP approved in October 2025 includes buffer fencing to exclude cattle. Keep Farming currently has no tenure over the buffer.<br>Keep Farming advised DPRID on 16 April 2025 that mustering of cattle from the development area and buffer area is an ongoing undertaking in consultation with adjacent pastoral lease holders (Carlton Plain and Legune). Pastoral station management are called as required for mustering purposes. Keep Farming records indicates that requests to Carlton Hill and Legune Stations for mustering was made on 9 June 2025.<br>The Shire of Wyndham East Kimberley rangers advised Keep Farming staff in mid-2025 that eradicating neighbour's cattle on your property is illegal. This has been verified. It is governed under the Cattle Trespass, Fencing and Impounding Act 1882 (WA) and the Local Government Miscellaneous Provisions Act 1960 (WA), which are both still in force.<br>**Consequently, Keep Farming cannot eradicate cattle in the buffer. Keep Farming has no authority (tenure) to manage other pests such as pigs or cats in buffer areas.** |
| EMP 73 | Install signs at the entry point to any access tracks in the Weaber Plain Buffer Area to discourage people from entering the area. | To reduce the risk of feral cats and dogs becoming established in the Buffer Area. | Prior to commencement of planting of crops | Refer to EMP13 | C | Refer to EMP13. Buffer access signage is in place. |
| EMP 74 | Ensure stock are removed from the Buffer Area. | To remove stock as an ongoing source of land degradation and a vector for introducing and spreading weeds throughout the Buffer Area. | Ongoing from commencement of ground disturbance | Refer to EMP72 | C | Refer to EMP72. |

*Appendix A Table 8. Weed, plant pathogen and pest animal monitoring regime*

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| EMP 75 | Weed species found along permanent weed survey transects in the buffer | Annually | No new plant pathogens or weed species observed or recorded in the mapped area during construction.<br>No new Priority Areas during construction. | • Map the extent of any new Priority Areas.<br>• Map the distribution of the newly introduced species.<br>• Identify activities that may have potentially introduced the species.<br>• Plan and implement a monitoring or control treatment program.<br>• Re-educate contractors/farm owners/managers of the importance of hygiene control measures. | 2025.KEMP.54a | C | No new plant pathogens or weed species were observed during the 2025 weed survey. |
| EMP 76 | Density/cover/distribution of weed species in the | Annually | No more than a 10% statistical increase in weed species density/ | • Map the extent of any new Priority Areas.<br>• Map the revised extent of the specific weed species within the site. | 2025.KEMP.54a | C | There was no more than 5% weed coverage at any transect. |

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| | permanent weed survey transects and common use infrastructure areas. | | cover/distribution compared to the results of initial weed survey.<br>No new Priority Areas | • Identify activities that may have potentially spread the weed species.<br>• Plan and implement a weed control treatment program.<br>• Apply hygiene control and education measures. | | | |
| EMP 77 | Presence of declared weeds in farm lots. | As required | No declared weed species present. | • Notify DAFWA if required.<br>• Investigate cause.<br>• Undertake weed control in accordance with DAFWA requirements.<br>• Monitor success of weed control. | Site inspection 20 June 2025, and others during audit year. | C | There are no declared weeds in Knox farm lots. Farm lots have been cleared and are either cropped or under development. |
| EMP 78 | Feral animals (including stock) in the buffer area | As required | No new pest animals or sightings of feral animals | • Investigate cause.<br>• Undertake eradication program as required.<br>• Undertake intervention or remediation works (e.g. reduce bins, trapping, re-education). | Site inspection 20 June 2025, and others during audit year. | C | Keep Farming advised DPRID on 16 April 2025 that mustering of cattle from the development area and buffer area is an ongoing undertaking in consultation with adjacent pastoral lease holders (Carlton Plain and Legune). Pastoral station management are called as required for mustering purposes. Keep Farming records indicates that requests to Carlton Hill and Legune Stations for mustering was made on 9 June 2025. |

*Appendix A Table 9. Surface water management actions*

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| KEMP 79 | Induct personnel on surface water management measures. | To reduce the potential for activities to adversely affect surface water values by ensuring construction personnel are aware of appropriate management measures. | Within one week of personnel commencing work on-site | 2025.KEMP.2a | C | Refer to page 5 in induction document. |
| EMP 80 | Construct levees at the perimeter of farmland adjacent to Border Creek to protect them from 1 in 20-year ARI flooding. | To protect farmland, prevent sedimentation of farm soil in Border Creek or the Keep River system. | Prior to commencement of planting of crops | Completed | CLD | Levees have been constructed on the northern perimeter of the Knox farmland adjacent Border Creek, per previous audit reports. |
| EMP 81 | Locate all drains on less permeable soils to minimise seepage to groundwater where possible. Where deeper drains are required, the excavated surface of the drain will be compacted to reduce seepage. | To reduce accessions to groundwater. | Prior to commencement of planting of crops | Site inspection 20 June 2025, and others during audit year. | C | Drainage compaction to reduce permeability and water loss was observed during the internal compliance site inspection on 20 June 2025, and with DCCEEW on 25 June 2025. |

*Appendix A Table 10. Surface water monitoring regime*

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status Knox | Comment |
|---|---|---|---|---|---|---|---|
| EMP 82 | Inspect areas along the banks of channels, watercourses and drainage devices downstream and adjacent to the project area for evidence of erosion. | Ongoing from commencement of ground disturbance | No exposed surfaces outside the channel from which erosion could occur | • Investigate cause.<br>• Implement erosion protection measures, such rock armouring or application of hydromulch to areas identified.<br>• Monitor the effectiveness of remedy. | Site inspection 20 June 2025.<br><br>See also DPIRD: 2024.EMP.2a – File note of site inspection – Knox – 16 April 2025 | C | The auditor observed records of erosion inspections following the 2025 wet season. |

*Appendix A Table 11. Groundwater management and monitoring actions*

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| KEMP 83 | Expand the groundwater monitoring bore network to include:<br>• 'high intensity' regional bores (i.e. auto loggers installed)<br>• 'low intensity' regional bores (i.e. no auto loggers installed but monitored manually). | To allow the collection of baseline and ongoing groundwater data to guide management. | Install prior to commencement of clearing of farm lots, a minimum of 18 months prior to irrigation. | 2025.KEMP.31a | PNC | This is an historical PNC carried forward from DPIRD (2023 Annual Report) as the timing is 18 months prior to irrigation. The Knox bore monitoring network was expanded (additional to the Goomig network) from 2015, with annual monitoring since that time.<br><br>Groundwater bores on the Knox Creek Plain have been monitored since 2015 including in the capacity of some as Goomig reference bores. A database of field and laboratory records since 2015 is available.<br><br>The previous auditor noted that the monitoring network requires confirmation in consultation with the Goomig-Knox Independent Review Group that operates under EPBC 2010/5491 and EPBC 2010/7143. Until this is completed, the previous auditor assessed as potentially non-compliant. Loggers are proposed for new bores; the locations of which are currently under review. |
| KEMP 84 | Undertake monitoring of the parameters below for bores established under Item 1 [KEMP 83]<br>High intensity bores:<br>• groundwater levels and temperature (automatic, daily)<br>• EC, pH, TDS, nutrients and pesticides seasonally<br>Low intensity bores:<br>• Groundwater levels, EC, pH, TDS, nutrients, and pesticides seasonally | To collect baseline and ongoing groundwater data to determine any adverse effects to the receiving environment from the Proposal. | Commencing 18 months prior to commencement of irrigation. | 2025.KEMP.31a<br>2025.KEMP.84a<br>2025.KEMP.84b<br>2025.KEMP.84c | PNC | The monitoring regime for the Knox Plain is provided on Page 50 of 2025.KEMP.31a. It does not require seasonal nutrients and pesticides. Laboratory analysis is required three-yearly. The last triennial laboratory analysis was undertaken in 2023 per 2025.KEMP.84b and 2025.KEMP.84c.<br>Annual depth and in-situ water quality analysis is undertaken on the listed Knox bores, per 2025.KEMP.84a.<br><br>The groundwater monitoring regime, distribution of bores and groundwater will be attended to in 2026, informed by the work of DPIRD discussed under KEMP 91. |
| EMP 85 | | | | | N/A | Item not included in Knox EMP |
| EMP 86 | Expand the groundwater monitoring bore network with the establishment of at least one 'on-farm' bore per farm. | To allow the collection of baseline and ongoing groundwater data to inform management. | Install after clearing of farm lots but prior to commencement of irrigation. | 2025.KEMP.31a<br>2025.EMP.84a | C | Refer to KEMP 87. The original bore monitoring network has been expanded and includes on-farm bores. 2025.KEMP.31a provides a map of the bore network on Knox. |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| KEMP 87 | Determine sampling parameters for 'on farm' bores including:<br>• groundwater levels<br>• EC<br>• pH | To inform management. | Prior to commencement of irrigation and annually after the commencement of irrigation. | 2025.KEMP.31a<br>2025.EMP.84a | C | Groundwater bores on the Knox Creek Plain have been monitored since 2015, prior to the commencement of irrigation. Sampling parameters include groundwater levels, EC, pH, nutrients and other parameters consistent with Goomig, under the schedule outlined in 2025.EMP87a.<br>Now that development and irrigation has substantially commenced on the Knox Creek Plain, the groundwater monitoring bore network and program requires review and confirmation in consultation with the IRG. |
| EMP 88 | Undertake monitoring of the bores established under [EMP 86] for physical, chemical, and nutrient parameters as determined by DWER licence conditions if regional bore ground water quality exceeds triggers. | To increase the monitoring spatial intensity to help determine location and reasons for exceedance. To assist with development of appropriate contingency action. | Annually at commencement of dry season once trigger has been exceeded. | Not applicable | N/A | A licence under the RIWI Act is not required. The groundwater bores are monitoring bores, not abstraction bores.<br>Strategen (2016) recommended that this item be deleted. |
| EMP 89 | Maintain a database of groundwater levels and groundwater quality data based on monitoring results. | To provide data to inform management.<br>To be used in combination with high and low intensity bores where exceedances of triggers are defined. | Ongoing – database to be updated at least every six months with the database to be established prior to June 2013. | 2025.KEMP.31a<br>2025.KEMP.84a | C | Keep Farming (and KAI) maintain a database of groundwater monitoring records and laboratory analysis data. Copies of the databases can be provided on request.<br><br>DPIRD also maintains master databases of groundwater level and quality data. |
| EMP 90 | Establish and maintain a database of groundwater chemical and nutrient parameters. | To provide data to inform management. | Ongoing – database to be updated annually. | Refer to EMP89 | C | Refer to EMP89 |
| KEMP 91 | Update groundwater model and operation of groundwater management system with monitoring data. | To assist in determining an optimal dewatering strategy and to forecast potential breaches of trigger values within a ten-year period. | Prior to commencement of irrigation and subsequently every 2–4 years depending on monitoring trends. If worst case scenario indicated a breach in trigger levels, modelling must be updated every two years. | 2025.KEMP.91a | PNC | The Knox groundwater model was not updated prior to the commencing of irrigation. However, the Knox groundwater modelling was originally completed by Cymod Systems in 2014 (as previously reported).<br><br>DPIRD has engaged Nullspace Technologies to revise the Goomig groundwater model. Once this is complete, the Knox model can be updated, as this work correlates. The Goomig groundwater model update is due in 2026, and will inform the Knox modelling. |
| KEMP 92 | Define the conditions at which various irrigation methods can be utilised for the Knox Creek Plain farms, based on the outcomes of modelling undertaken. | To maximise water use efficiency and minimise potential environmental impacts of shallow groundwater levels by managing irrigated agriculture and/or cropping systems where required, e.g. on leased farms. | Review every five years in association with modelling from the commencement of irrigation. | Not applicable | NR | Not yet required.<br>To be determined following the outcomes of future modelling (refer to comments in relation to KEMP 91). |
| KEMP 93 | Adopt water quality trigger values established under the | To ensure monitoring and management responses | Ongoing | 2025.KEMP.31a<br>2025.KEMP.93a | C | This action relates to the adoption of water quality trigger values for the Keep River which is the receiving environment for agricultural stormwater from the Weaber (Goomig) and Knox Plain developments. |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| | requirements of EPBC Approval 2010/5491 | relate to appropriate trigger levels. | | | | Water quality triggers have been adopted per the "Goomig Stormwater Discharge Monitoring and Management (EPBC 2010/5491)" interim guide prepared by DPIRD. |

*Appendix A Table 12. Groundwater contingency actions*

| Item | Trigger | Corrective action | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 94 | Groundwater levels, soil salinity and quality exceed or are likely to exceed trigger levels | 1. Investigate cause.<br>2. Implement actions consistent with Groundwater Management Plan Appendix 3 (e.g. modify land use/irrigation strategies, groundwater extraction).<br>3. Document changes in Annual Environmental Report (AER). | Refer Groundwater Management Plan Appendix 3 | Previous (DPIRD) evidence item 2024.EMP89 - Bell et al (2025) | Unable to assess | Keep Farming is awaiting data analysis and review by DPIRD hydrogeologists, in relation to groundwater levels and soil quality triggers. This will inform future monitoring and response measures, to be included in the revised Groundwater Management Plan which is currently being prepared for DPIRD. |
| EMP 95 | Levels of chemicals and nutrients exceed scenarios that show:<br>• an increasing trend in the concentration of any chemical (at statistical confidence levels)<br>• an exceedance of the site-specific triggers for a particular chemical over two consecutive years. | 1. Implement Item 8 and 9 (Table 14) to better map the distribution of groundwater exceeding target levels.<br>2. Investigate cause.<br>3. In consultation with the IRG, identify remedial action required, which could include the modification of irrigation and agricultural practices, reducing or ceasing the use of fertiliser and/or chemicals, groundwater abstraction or a combination of these measures.<br>4. Implement remedial action immediately after trigger levels are exceeded or, in consultation with the IRG, at an appropriate time.<br>5. Monitor success of remedy quarterly for 12 months or, following consultation with the IRG and in accordance with the advice from the IRG.<br>6. Document changes in Annual Environmental Report (AER). | Refer Groundwater Management Plan Appendix 3 | Previous (DPIRD) evidence item 2023.EMP91c – 2024 Goomig groundwater review scope | Unable to assess | Keep Farming is awaiting data analysis and review by DPIRD hydrogeologists, in relation to groundwater levels and soil quality triggers. This will inform future monitoring and response measures, to be included in the revised Groundwater Management Plan which is currently being prepared for DPIRD. |

*Appendix A Table 13. Discharge management actions*

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| KEMP 96 | Construct a tailwater retention area on each farm lot sufficient to retain stormwater runoff during the periods most critical (low flow periods) to the Keep River system. | Capacity to manage runoff to avoid transporting chemicals downstream. | Prior to commencement of irrigation | 2025.KEMP.31a | C | Figure 2 of 2025.KEMP.31a illustrates tailwater holding on Knox. There were no tailwater incidents in 2025. |
| EMP 97 | No usage of chemicals and fertilisers when the tailwater retention capacity is unavailable. | To prevent the transporting of nutrients and chemicals downstream. | Ongoing from commencement of farming | 2025.KEMP.31a | C | Figure 2 of 2025.KEMP.31a illustrates tailwater holding on Knox. Tailwater recycling and holding are practiced on Knox. There were no tailwater incidents in 2025. |
| EMP 98 | Provide an Information Package to prospective landowners/lessees, which:<br>• outlines the susceptibility of soil to erosion from high intensity rainfall during the wet season, | To minimise the potential for agricultural practices to result in erosion by ensuring prospective landowners are aware of the risks and appropriate management measures. | At sublease of farm lots | Not applicable | CLD | Assessed as completed in previous audits. |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| | • encourages maintenance of crop cover during the wet season to reduce soil erosion,<br>• outlines optimal irrigation strategies to reduce potential impacts of sodicity and salinity,<br>• includes information regarding identification of salinity and sodicity and mechanisms to report this to the Proponent. | | | | | |
| KEMP 99 | Adopt water quality trigger levels, as developed in consultation with the IRG under EPBC Approval 2010/5491 and EPBC 2014/7143. | To manage the discharge of stormwater and surplus groundwater to protect the downstream environment and EPBC listed species. | Prior to commencement of irrigation | 2025.KEMP.31a<br>2025.KEMP.93a | C | Water quality triggers have been adopted per the "Goomig Stormwater Discharge Monitoring and Management (EPBC 2010/5491)" interim guide prepared by DPIRD (2025.KEMP.93a). |
| KEMP 100 | Establish and update annually, a list of key analytes (chemicals and nutrients) to be sampled, based on-farm practices as part of ongoing water quality monitoring | To ensure key chemicals and nutrients are included in water quality monitoring. | Prior to commencement of planting of crops, then ongoing annually | 2025.KEMP.100a<br>2025.KEMP.100b<br>2025.KEMP.31a | C | Annual farm chemical (pesticide) updates are undertaken in consultation with the IRG. Chemicals to be used in 2025 were provided to the IRG meeting in October 2024. Evidence item 2025.KEMP.100a provides the record of the meeting. Evidence item 2025.KEMP.100b provides the agenda paper for the February 2026 IRG meeting which addresses this requirement, and includes a 2025 calendar outlining seasonal chemical use on Knox (and Goomig).<br>2025.KEMP.31a provides sampling results from 2025. |
| KEMP 101 | Install a water quality and flow gauging station at the stormwater outlet from the Development Area. | Install a water quality and flow gauging station at the stormwater outlet from the Development Area. | To determine flow rate from the Project Area to inform management. | 2025.KEMP.31a | C | While Knox remains under construction, gauging equipment has not yet been installed, but monitoring of water quality and downstream erosion is undertaken manually/visually to meet the intent of this action. Surface water loggers will be installed on stormwater outlets as the Knox farm development and outlet construction continues. The intent has been met in the interim. Refer also to 2025.KEMP.109.<br>Note that there is no timing obligation on this action. |
| EMP 102 | Monitor water quality at the stormwater outlet from the Development Area, in consultation with DPIRD, DWER and DBCA. | To determine salinity and nutrient contribution from the Project Area to inform management. | On a flow proportional basis (with the ability to sample sub-daily as required) | 2025.KEMP.31a | C | 2025.KEMP.31a provides sampling results from 2025, including sampling at the Knox stormwater outlet, and downstream in the Keep River. |
| KEMP 102 | Monitor water quality at the stormwater outlet from the Development Area | To determine salinity and nutrient contribution from the Project Area to inform management. | On a flow proportional basis (with the ability to sample sub-daily as required) | 2025.KEMP.31a | C | 2025.KEMP.31a provides sampling results from 2025, including sampling at the Knox stormwater outlet, and downstream in the Keep River |
| EMP 103 | Ensure the flow gauging stations at Border Creek and the Keep River have the required accuracy to measure low flow rates in consultation with the Northern Territory NRETAS and IRG. | To provide flow data to manage the discharge of stormwater and surplus groundwater. | Prior to commencement of planting of crops | 2025.KEMP.31a | C | A service agreement with associated technical specifications was established with the Northern Territory Government in October 2013 and extended in 2018.<br>Refer to the Northern Territory Government Water Data Portal for evidence of the Northern Territory Government's continued delivery of these services. https://ntg.aquaticinformatics.net |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| | | | | | | 2025.KEMP.31a provides results from 2025, including flows in Border Creek and Keep River, taken from the NT water data portal.<br>This action is now complete, given that the timing was 'prior to the commencement of the planting of crops'. |
| KEMP 104 | Monitor water flow at the stormwater outlet from the Development Area and the Keep River to preserve and protect the water quality of the Keep River | To preserve and protect the water quality of the Keep River and EPBC listed species, prevent erosion of the banks of the Keep River and provide maximum mixing potential. | Ongoing from commencement of irrigation | 2025.KEMP.31a | C | 2025.KEMP.31a provides sampling results from 2025. |
| EMP 105 | Develop and implement an adaptive groundwater and stormwater discharge program that addresses:<br>• design and location of dewatering infrastructure,<br>• design and location of discharge infrastructure,<br>• discharge rates, rules, and contingency actions,<br>• monitoring locations and requirements including infrastructure and setup,<br>• written evidence of any Northern Territory Government permits that are required for discharge of<br>• groundwater, management measures that ensure discharge of water will not impact on water quality in Border Creek/Keep River; this includes erosion protection measures. | To provide information for adaptive management of the discharge of stormwater and surplus groundwater. | Ongoing after sale/lease of farmland and prior to the commencement of stormwater and groundwater discharge from operational farms | 2025.KEMP.31a<br>2025.KEMP.93a<br>2025.KEMP.105a | C | The Interim Stormwater Discharge Monitoring and Management Approach document (2025.KEMP.93a) provides the current discharge rules.<br>2025.KEMP.105a provides approved discharge locations under the revised Knox Final Project Design Plan (FPDP). |
| KEMP 106 | Refine the discharge dilution model/relationship based on river flow monitoring data | To determine when flow rates at the Keep River fall below a minimum flow rate to enable flushing. | Prior to commencement of irrigation | 2025.KEMP.31a<br>2025.KEMP.93a<br>2025.KEMP.105a<br><br>See also previous years' evidence items re IRG and stormwater discharge | C | The Interim Stormwater Discharge Monitoring and Management Approach document (2025.KEMP.93a) provides the current discharge rules.<br>2025.KEMP.105a provides approved discharge locations under the revised Knox Final Project Design Plan (FPDP).<br><br>This action is now complete, given that the timing was 'prior to the commencement of irrigation'. |
| EMP 107 | Refine the discharge dilution model/relationship based on flow monitoring data from the Development Area and the Keep River system and water quality characteristics of stormwater from the Development Area. | To determine when flow rates at the Keep River fall below a minimum flow rate to enable flushing. | On a seasonal basis, commencing 12 months after commencement of irrigation | 2025.KEMP.31a<br>2025.KEMP.93a<br>2025.KEMP.105a<br>2025.KEMP.107a | C | The Interim Stormwater Discharge Monitoring and Management Approach document (2025.KEMP.93a) provides the current discharge rules.<br><br>A revised Stormwater and Aquatic Fauna Management Plan is in preparation (via DPIRD) see 2025.KEMP.107a. |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| KEMP 108 | Review/refine trigger values for the Keep River pools. | To update discharge model. | Annually | 2025.KEMP.31a<br>2025.KEMP.93a<br>2025.KEMP.100a<br>2025.KEMP.105a<br>2025.KEMP.108a | C | Trigger values are considered annually at IRG meetings and following review of water quality data for the previous year. |

*Appendix A Table 14. Discharge monitoring regime and corrective actions*

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| KEMP 109 | Telemetered flow monitoring at the development gauge, and the existing gauging station on the Keep River and in groundwater discharge pipe. | Continuous (hourly) flow monitoring when stormwater or groundwater discharge occurs. | No discharge of surplus groundwater to the Keep River unless there is sufficient threshold natural flow.<br>No significant impact on the health of aquatic ecosystems from stormwater and surplus groundwater. | 1. Investigate cause. This could include examining management practices and identifying instances where water may have been unnecessarily discharged during low flow periods.<br>2. Conduct an intensive water quality sampling program upstream and downstream of the discharge point.<br>3. Immediately initiate processes to identify whether remedial action is required, in consultation with the IRG. Remedial actions could include:<br>• releasing irrigation water from the M2 channel into Knox Creek<br>• increasing groundwater pumping into the Ord Stage 1 or 2 supply channel during periods of low river flow<br>• installing additional erosion protection<br>• educating farm owners/managers<br>• revision of management practices (including groundwater discharge rules).<br>4. Implement remedial action/s.<br>5. Monitor success of remedial action/s quarterly for a period of 12 months<br>6. Report on any findings as a result of monitoring. | 2025.KEMP.31a | C | Telemetered flow monitoring is yet to be installed on the Knox stormwater outlet commissioned in 2025. Monitoring is manual/visual. Telemetered flow monitoring downstream at the Keep River gauge indicates no unseasonal flows.<br><br>This item has been classified as compliant because the intent has been met (In the context of the current stage of construction) and can be shown using downstream telemetered data, and because only stage 1 of Knox is currently cropped. Surface water loggers will be installed on stormwater outlets as the Knox farm development and outlet construction continues.<br><br>There is no groundwater discharge pipe. |
| KEMP 110 | Utilise the aquatic ecology monitoring conducted under EPBC Approval 2010/5491 as an indicator of the outcomes of the combined Weaber and Knox management. | Ongoing | No detrimental change in the AUSRIVAS macroinvertebrate category and in fish assemblage composition that is caused by the action. This can be resulting from stormwater, surplus groundwater and groundwater seepage increases, as compared against reference sites that reflect natural variability in ecosystem health. | 1. Immediately investigate cause over a period of at least 12 months through reviewing management practices and determining whether ecological health of aquatic fauna has deteriorated.<br>2. Identify remedial action required. Remedial actions could include:<br>• releasing irrigation water from the M2 channel into Border Creek to flush fresh water to the Keep River<br>• increasing the pumping rates of the eastern bores to reduce groundwater seepage<br>• increasing groundwater pumping into the Ord Stage 1 or 2 supply channel during periods of low river flow<br>• potentially, pending analysis, discharging groundwater into the lower Keep River estuary<br>• installing additional erosion protection<br>• educating farm owners/managers<br>• revision of management practices (including groundwater discharge rules)<br>• review flow monitoring data. | 2025.KEMP.107a<br>2025.KEMP.110a | C | Refer to 2025.KEMP.110a for findings of the *Ecological Health, Sawfish Survey and Assessment 2025*. |

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| | | | | 3. Implement remedial action/s, as required, immediately or at a time determined with the IRG to be appropriate.<br>4. Monitor success of remedial action/s at least quarterly for 12 months.<br>5. Report on any findings in Annual Environmental Report (AER) as a result of monitoring. | | | |

*Appendix A Table 15. Biodiversity and habitat management actions*

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 111 | Induct personnel on biodiversity and habitat management measures | To minimise potential for adverse environmental impacts by ensuring personnel are informed of appropriate environmental management procedures. | Within one week of personnel commencing work on-site | 2025.KEMP.00<br>2025.KEMP.2a | C | Induction pages 4, 6, 7. |
| EMP 112 | Ensure development maps clearly delineate the Buffer Area and Development Area | To prevent unauthorised clearing by ensuring clearing boundaries are appropriately documented. | Prior to ground disturbance | 2025.KEMP.3a | PNC | Refer to incident report re clearing footprint at stormwater outlet (2025.KEMP.3a) / EMP 6. |
| EMP 113 | Delineate the boundaries of the vegetation to be cleared for construction in the field with flagging tape, signage or fencing. | To prevent unauthorised clearing by ensuring clearing boundaries are appropriately marked in the field. | Prior to ground disturbance | 2025.KEMP.3a | PNC | Refer to incident report re clearing footprint at stormwater outlet (2025.KEMP.3a) / EMP 6. |
| EMP 114 | Restrict movement of construction machinery and equipment to designated tracks and roads | To minimise disturbance by consolidating vehicle access to designated areas. | Ongoing from commencement of ground disturbance | Site inspection 20 June 2025 | C | Construction machinery and equipment is used on farm, and is moved on tracks. Induction includes speed limits and requirements to stay on tracks (p8). |
| EMP 115 | Stage clearing of vegetation so that areas are cleared only as required. | To minimise the area of exposed surfaces at any one time and to allow native animals the chance to move on. | During construction of shared infrastructure | Refer to EMP 7 | C | |
| EMP 116 | Manage topsoil in accordance with the Soil Management Sub-plan | To provide a natural source of seed, organic matter, and microorganisms for areas to be rehabilitated. | During construction of infrastructure | Site inspection 20 June 2025 | C | Refer to EMP 9. Topsoil storage is not required. Topsoil is spread for farm use. |
| EMP 117 | Give native animals encountered on-site the opportunity to move on if there is no threat to personnel safety in doing so. | To prevent injury or death to native animals. | Ongoing from commencement of ground disturbance | 2025.KEMP.00 | C | No incident reports re interaction with native animals. |
| EMP 118 | Call the nominated carer or Wildlife Hotline to rescue sick or injured native animals if they are encountered. | To prevent loss of native animals. | Ongoing from commencement of ground disturbance | 2025.KEMP.00 | C | No incident reports re interaction with injured native animals. |

*Appendix A Table 16. Biodiversity and habitat monitoring regime*

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| EMP 119 | Compliance of marked clearing boundary with development maps. | Daily | No clearing adjacent to areas where clearing boundaries are not defined. | Report as Environmental Incident and initiate Incident Procedure which shall include:<br>• investigating the cause of the incident,<br>• redefining boundaries. | Refer to EMP 3, and EMP 6.<br><br>2025.KEMP.3a | PNC | Refer to EMP 3, and EMP 6.<br><br>The corrective action has been undertaken as required, per 2025.KEMP.3a. |
| EMP 120 | Extent of clearing and ground | Daily | No clearing or disturbance outside of | Report as Environmental Incident and initiate Incident Procedure which shall include: | Refer to EMP 3, and EMP 6. | PNC | Refer to EMP 3, and EMP 6. |

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| | disturbance along pre-defined boundaries. | | pre-defined boundaries (Figure 1). | • investigating the cause of the incident<br>• redefining boundaries if due to inadequate boundary marking,<br>• rehabilitating affected area as required in accordance with the Rehabilitation Management Sub-plan,<br>• monitoring the success of remedial action. | 2025.KEMP.3a | | The corrective action has been undertaken as required, per 2025.KEMP.3a. |

*Appendix A Table 17. Buffer management actions*

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 121 | Control vehicle access to the buffer through designated tracks, and provision of signage to inform of restrictions to areas, including speed restrictions, hygiene protocols, and to advise that no off-track driving is permitted. | To minimise impacts to the buffer by consolidating and restricting access | At all times | 2025.KEMP.00<br>2025.KEMP.2a | C | Buffer areas area accessed by authorised personnel only via designated access tracks.<br>Induction includes speed limits and requirements to stay on tracks (p8). |
| KEMP 121 | Control vehicle access to the buffer through designated tracks, and provision of signage to inform of restrictions to areas. | To minimise impacts to the buffer by consolidating and restricting access | At all times | 2025.KEMP.00<br>2025.KEMP.2a | C | Buffer areas area accessed by authorised personnel only via designated access tracks.<br>Induction includes speed limits and requirements to stay on tracks (p8). |
| EMP 122 | Control human access to the buffer through provision of and signage at entry points to Buffer Area advising of restrictions and no unauthorised access. | To minimise impacts to the buffer by restricting access | At all times | 2025.KEMP.00<br>2025.KEMP.2a | C | Buffer areas area accessed by authorised personnel only via designated access tracks.<br>Induction includes speed limits and requirements to stay on tracks (p8). |
| KEMP 123 | Induct all personnel constructing or utilising infrastructure within the Buffer Area, including roads and groundwater bores. | To minimise potential for adverse environmental impacts by ensuring personnel are informed of environmental management procedures | Within one week of commencing work on-site | 2025.KEMP.00<br>2025.KEMP.2a | C | Only approved personnel (eg Environmental Officer and staff conducting essential monitoring) can enter the buffer. |
| EMP 124 | Assess and map vegetation condition within the buffer according to the Keighery (1994) Vegetation Condition rating scale. | To provide data to inform management. | Prior to ground disturbance | Not applicable | CLD | Item assessed as completed in a previous audit period. Baseline vegetation condition assessment and mapping was undertaken in 2015 (Ord Land and Water 2015). |
| EMP 125 | Stabilise and revegetate areas identified as containing vegetation below a rating of 'Very Good' in accordance with species lists and planting procedures determined in consultation with DPW AND/OR DER. | To better enable the Buffer Area to fulfil its intended role and purpose by restoring ecological integrity and function to degraded areas. | Within 12 months of completion of construction of infrastructure | Not yet required. | NR | Construction of infrastructure in buffer (eg fencing) has not yet commenced. |
| KEMP 125 | Stabilise and spread topsoil (if available) in areas identified as containing vegetation below a rating of 'Very Good' | To better enable the Buffer Area to fulfil its intended role and purpose by restoring | Within 12 months of completion of | Not yet required | NR | Construction of infrastructure in buffer (eg fencing) has not yet commenced. |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| | in accordance with species lists and planting procedures determined in consultation with DPW. | ecological integrity and function to degraded areas. | construction of infrastructure | | | |
| KEMP 126 | If required for degraded areas, revegetate areas within the buffer with species selected specifically for their ability to lower the groundwater table, given the local soil, water and solute settings. | To improve the ability of the buffer to reduce the potential impacts of elevated groundwater levels and minimise diffuse groundwater discharge (including salts) to downstream watercourses. | Within 12 months of completion of construction of infrastructure and as determined to be required in consultation with DPW. | Not yet required | NR | Construction of infrastructure in buffer (eg fencing) has not yet commenced. |
| EMP 127 | Undertake weed control in areas identified as containing vegetation below a rating of 'Very Good', focusing on the most degraded areas first and in accordance with procedures detailed in the Weed, Plant Pathogen and Pest Animal Management Sub-plan. | To better enable the Buffer Area to fulfil its intended role and purpose by restoring ecological integrity and function to degraded areas. | Within 12 months of completion of construction of infrastructure and ongoing | Not yet required | NR | Construction of infrastructure in buffer (eg fencing) has not yet commenced. |
| EMP 128 | Liaise with DPW with regard to their plans for implementation of the State Cane Toad Strategy (DEC 2009) in the Development Area. | To reduce the potential effect of cane toads on the Buffer Area. | As required | Not applicable | N/A | Item assessed as completed in a previous audit period (refer to Strategen 2015). |
| EMP 129 | Provide information to land owners and Traditional Owners, on the Cane Toad Strategy for Western Australia (DEC 2009). | To reduce the potential effect of cane toads on the Buffer Area | At sublease of farm lots | Not applicable | N/A | Item assessed as completed in a previous audit period (refer to Strategen 2015). |
| EMP 130 | Investigate the possibility of extending the DPW AND/OR DER Traditional Owner Ranger Program (Kununurra based) into the Buffer Area or incorporating other Indigenous management initiatives – consult with MG Corporation regarding shared responsibilities for maintenance of the Buffer Area. | To maximise opportunities for involvement of Traditional Owners in ongoing management of the Buffer Area | Ongoing | Not applicable | NA | Item assessed as completed in a previous audit period (refer to Strategen 2015). |
| EMP 131 | Maintain the Buffer Area perimeter fencing, where required, to minimise stock invasion, remove introduced livestock, and continue to remove any subsequent invading livestock, as required, to protect native vegetation condition | To ensure species and habitats within the Buffer Area are not adversely affected by stock grazing | Ongoing | 2025.KEMP.105a | NR | The buffer infrastructure plan was approved in the revised FPDP in October 2025 (2025.KEMP.105a).<br><br>Once the fencing is in place, maintenance will be required. |
| KEMP 132 | Prepare Knox Creek Plain fire management plan in compliance with Shire of Wyndham East Kimberley (SWEK) and Department of Fire and Emergency Services (DFES) requirements. | To identify fire risk areas, prevention, and control strategies. | Prior to ground disturbance | 2025.KEMP.132a<br>2025.KEMP.132b<br>2025.KEMP.00<br>2025.KEMP.23a | C | Refer to 2025.KEMP.132b for detailed discussion re fire management on the Knox Plain.<br><br>A fire management guide has been prepared (2025.KEMP.132a). |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| | Firebreak and buffer management access construction and annual maintenance in compliance with SWEK and/or DFES requirements. | To assist in fire containment in the event of wildfire or controlled burns. | Ongoing from commencement of ground disturbance | | | Firebreaks were unable to be constructed in the buffer until the FPDP was approved (October 2025), at which point the wet season prevented this occurring.<br>Flammable products are stored appropriately.<br>There were no wildfires or escaped fires originating on the Knox Plain in 2025. |
| | Inspect fuel hazards within various zones and implement fire hazard reduction. | To minimise risk of uncontrollable fire outbreak. | Annually | | | |
| | Ensure correct storage and isolation of flammable substances. | To reduce risk of fire. | Ongoing | | | |
| | Obtain fire permits for controlled burns. | To ensure compliance with local government requirements and to restrict burning to when climatic conditions are such that risk of wildfire is minimised. | Ongoing | | | |
| | Investigate all fires originating in the Knox Creek Plain. | To prevent re-occurrence where possible. | Ongoing | | | |

*Appendix A Table 18. Buffer monitoring regime*

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| EMP 133 | Assess vegetation condition using the Keighery (1994) rating scale and update vegetation condition map. | Annually commencing within 12 months of the commencement of the action. | All areas within buffer to be in 'Very Good' or better condition. | Investigate cause, e.g. cattle intrusion, loss of seed through heavy rains.<br>Take appropriate remedial actions, e.g. feral animal eradication programs, stabilise and revegetate area.<br>Monitor success of remedy (annually at time of regular monitoring). | 2025.KEMP.43a | C | On DWER's advice, DPIRD collects quantitative data to monitor buffer area condition following the guide for '*Establishing Pastoralist Monitoring Sites in the Grasslands'* (DPIRD 2020) and the '*Pasture Condition Guide for the Kimberley'* (Ryan 2013) rather than the Keighery rating scale stipulated in this monitoring item. Vegetation condition ratings were also made in accordance with EPA (2016) *Technical Guidance*. The buffer vegetation condition map has not been updated. Only 1 site of the 11 on Knox was considered in poor condition, with the remainder including 8 'very good' and 2 'good'.<br>Site KNX11, upstream and 5km from the Knox development, and north of Border Creek remains in poor condition. This condition is historic, and reflects grazing and the presence of weeds *Parkinsonia* (<1% cover) and *Panicum decompositum*. This site is virtually inaccessible from the Knox development, and is adjacent to the DBCA Darrmalanka Conservation Park.<br><br>The inset image, taken from 2025.KEMP.43a, indicates the location. It is fair to assess that Keep Farming cannot be held responsible for the condition of this site which is 5km from the Knox development and isolated from the development by Border Creek. |

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| | | | | | | | Consequently, despite the target of all areas being in very good condition not being met, a non-compliance should not be applied to this action. |

*Appendix A Table 19. Rehabilitation management actions*

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 134 | Select reference sites in buffer and conservation areas containing landforms and vegetation comparable (or likely to have been comparable) to those of planned disturbance areas not required post-construction. | To locate suitable sites against which to compare rehabilitation success. | Prior to ground disturbance | NA | NR | There are no areas proposed for rehabilitation in the Knox Creek Plain area in the immediate future. The proposed Knox borrow pit will require rehabilitation in the future. Rehabilitation planning is a requirement of mine (including borrow pit) closure under the *Mining Act 1978* (WA). |
| EMP 135 | Survey reference sites identified in Item 1 [EMP 134] to determine indicator species, density of native species, % cover of native species, native species richness and % weed cover as outlined in the monitoring procedures. | To provide data against which rehabilitation success can be measured. | Prior to ground disturbance and quarterly throughout the rehabilitation process | NA | NR | |
| EMP 136 | Determine parameters and targets for each indicator species as appropriate. e.g. density of indicator species, % cover of indicator species, etc. | To enable specific aspects of rehabilitation success to be measured. | Prior to ground disturbance | Refer to EMP 134 and EMP 135 | NR | Refer to EMP 134 and EMP 135 |
| EMP 137 | Undertake a weed survey of the project area to establish baseline information in accordance with the Weed, Plant Pathogen and Pest Animal Management Sub-plan. | To provide data to inform management. | As specified in the Weed, Plant Pathogen and Pest Animal Management Sub-plan | Not applicable | CLD | Item assessed as completed in a previous audit period. Refer to Ord Land and Water (2015). |
| EMP 138 | Develop a species list for seed collection based on species known to germinate from seed and/or that can be | To maximise potential for rehabilitation success by ensuring | As required for rehabilitation | Refer to EMP 134 and 135 | NR | Refer to EMP 134 and 135 |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| | propagated by nurseries (may require consultation with nurseries and rehabilitation specialists in the area). | appropriate species are used in seeding/planting. | | | | |
| EMP 139 | Contract experienced seed collector licensed by the DPW AND/OR DER to undertake a seed collection program of plant species endemic to the project area following *Florabank Guidelines* (Greening Australia 2009) including:<br>• gathering information and targeting certain species<br>• undertaking seed collection in the optimum season for the species<br>• collecting only mature seed<br>• determining seed collection method (e.g. natural seed fall, collection by hand, mechanical harvesting, etc.<br>• maintaining detailed record sheets to provide evidence that the seed is local provenance, e.g. date of collection, time of collection, person undertaking collection etc.<br>• preparing material for transportation. | To maximise potential for rehabilitation success by ensuring seed collection is undertaken in accordance with appropriate guidelines and procedures. | As required for rehabilitation | Refer to EMP 134 and 135 | NR | Refer to EMP 134 and 135 |
| EMP 140 | Ensure all seed to be used in rehabilitation is sourced from species that are endemic to the area/local provenance (unless otherwise authorised by the DPW AND/OR DER). | To ensure species used in rehabilitation have adaptations to suit local conditions. | As required for rehabilitation | Refer to EMP 134 and EMP 135 | NR | |
| EMP 141 | Monitor the progress of seed collection and store and process seed in accordance with the seed collection and direct seeding procedure. | To maximise potential for rehabilitation success by ensuring seed collection is undertaken appropriately. | As required for rehabilitation | Refer to EMP 134 and EMP 135 | NR | |
| EMP 142 | Implement hygiene management actions as outlined in the Weed, Plant Pathogen and Pest Animal Management Sub-plan. | To maximise potential for rehabilitation success by preventing the introduction and/or spread of weeds and plant pathogens into rehabilitation areas. | As specified in the Weed, Plant Pathogen and Pest Animal Management Sub-plan | | NR | Refer to EMP 134 |
| EMP 143 | Control stock within buffer area in accordance with the Weed, Plant Pathogen and Pest Management Sub-plan. | To maximise potential for rehabilitation success by preventing stock from entering rehabilitation areas. | As specified in the Weed, Plant Pathogen and Pest Animal Management Sub-plan | Refer to EMP 72 and EMP 78 | C | Refer to EMP 72 and EMP 78.<br>No cattle were observed in the Knox Buffer during the DPIRD site inspection on 16 April 2025. Keep Farming further advised that mustering of cattle from the development area and buffer area is an ongoing undertaking in consultation with adjacent pastoral lease holders (Carlton Plain and Legune). Pastoral station management are called as required for mustering purposes. |
| EMP 144 | Ensure all foreign material is removed from the site to be recycled or reused where practicable, or disposed of off-site before rehabilitation is carried out. | To enable rehabilitation to commence. | Prior to rehabilitation | Not applicable | NR | There are no areas proposed for rehabilitation in the Knox Creek Plain area. |
| EMP 145 | Areas suspected to be contaminated by spills or leaks of hydrocarbons and/or inappropriate disposal of wastes will be investigated to determine the presence and/or level of contamination. | To determine whether rehabilitation areas are required to be remediated. | Prior to rehabilitation | Not applicable | NR | Refer to EMP 144 |
| EMP 146 | Remediate any soils that are determined to be contaminated. | To maximise potential for rehabilitation success by ensuring | Prior to rehabilitation | Not applicable | NR | Refer to EMP 144 |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| | | rehabilitation areas are not contaminated. | | | | |
| EMP 147 | Disturbed areas will be stabilised through a combination of contouring and slope stabilisation as required. | To minimise erosion of rehabilitated landforms. | Progressively as disturbed areas are no longer required | Not applicable | NR | Refer to EMP 144 |
| EMP 148 | All rehabilitation areas will be reshaped and contoured to blend with adjacent relief and drainage as far as practicable. This will include:<br>• the removal of impediments to run-off<br>• diversion of surface run-off around borrow pits to prevent flooding and potential instability of pit walls<br>• where necessary filling of borrow pits with subsoil to level of natural ground surface. | To minimise erosion of rehabilitated landforms. | During the rehabilitation process | Not applicable | NR | Refer to EMP 144 |
| EMP 149 | All tracks to be rehabilitated will be ripped or scarified to minimise compaction. | To maximise potential for rehabilitation success by allowing roots and water to penetrate the soil profile. | During the rehabilitation process | Not applicable | NR | Refer to EMP 144 |
| EMP 150 | Remove topsoil from cleared areas and manage in accordance with the Biodiversity and Habitat Management Sub-plan. | To provide a natural source of seed, organic matter and microorganisms for areas to be rehabilitated. | During construction of shared infrastructure | Not applicable | NR | Refer to EMP 144.<br>There is no shared infrastructure under construction on Knox. |
| EMP 151 | Ensure material to be used for rehabilitation (e.g. topsoil, cleared vegetation, etc.) does not contain declared weeds. | To maximise potential for rehabilitation success by preventing the introduction and/or spread of declared weeds into rehabilitation areas. | Prior to rehabilitation | Not applicable | NR | Refer to EMP 144 |
| EMP 152 | Relocate stripped topsoil and (if applicable) cleared vegetation directly to areas required to be rehabilitated, where possible. | To maximise the benefits of using topsoil and mulch by minimising storage time. | During construction of shared infrastructure | Not applicable | NR | Refer to EMP 144<br>There are no current areas requiring future rehabilitation on the Knox Creek Plain, therefore topsoil has not been relocated or stockpiled.<br><br>There is no shared infrastructure under construction. |
| EMP 153 | Spread stripped topsoil evenly across areas to be rehabilitated (to a nominal depth of approximately 100–150 mm). Work parallel with the contours as far as practicable, to minimise the creation of preferential drainage pathways. | To provide a natural source of seed, organic matter and microorganisms for areas to be rehabilitated. | During rehabilitation process | Not applicable | NR | Refer to EMP 144 |
| EMP 154 | Rake rehabilitation areas to minimise potential impacts from compaction. | To maximise potential for rehabilitation success by allowing roots and water to penetrate the soil profile. | After spreading of topsoil and prior to placement of cleared vegetation | Not applicable | NR | Refer to EMP 144 |
| EMP 155 | Where direct replacement of rehabilitation material (e.g. topsoil, cleared vegetation, etc.) is not possible, stockpile material for later use in rehabilitation activities. | To provide a natural source of seed, organic matter and microorganisms for areas to be rehabilitated. | During construction of shared infrastructure | Not applicable | NR | Refer to EMP 144 |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 156 | Locate stockpiles of rehabilitation material (e.g. topsoil, cleared vegetation, etc.) within already disturbed areas wherever possible. | To minimise disturbance. | Ongoing from commencement of ground disturbance | Not applicable | NR | Refer to EMP 144 |
| EMP 157 | Restrict topsoil stockpile height to less than 2 m. | To conserve native seed banks for direct propagule return, reduce the risk of self-composting and provide opportunities for the roots of temporary vegetation growing on the topsoil stockpile to reach the deepest parts of the stockpile, thereby sustaining many micro-organisms. | Ongoing from commencement of ground disturbance | Not applicable | NR | Refer to EMP 144 |
| EMP 158 | Where topsoil is not available, import topsoil in consultation with the Department of Parks and Wildlife (DPW) Kununurra office. | To provide a natural source of seed, organic matter and microorganisms for areas to be rehabilitated. | Prior to rehabilitation | Not applicable | N/A | Refer to EMP 144 |
| EMP 159 | Provide temporary fencing and signage around rehabilitation areas. | To minimise disturbance to rehabilitation areas by restricting access. | During rehabilitation process | Not applicable | NR | Refer to EMP 144 |
| EMP 160 | Inspect borrow pits no longer required following construction to ensure all pits are backfilled and rehabilitated such that they are free draining. | To ensure timely and appropriate rehabilitation of borrow pits. | As required | Not applicable | NR | Not currently required. |
| EMP 161 | Where there is insufficient subsoil for backfilling:<br>• import material for backfilling in consultation with DPW if applicable,<br>• ensure pits are rehabilitated to minimise standing shallow water as much as possible. | To minimise the creation of mosquito breeding habitat. | As required | Not applicable | NR | Refer to EMP 160 |

*Appendix A Table 20. Rehabilitation monitoring regime*

| Item | Activity and location | Frequency/ timing | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| EMP 162 | Native species richness, density and % cover within rehabilitation sites as outlined in the monitoring procedures. | Twice annually (in May and October). | Mean native species richness, plant density and % cover in the rehabilitation site after five years (including at least two wet seasons where >75% of the long-term average rainfall has fallen) is greater than:<br>• 70% of the mean % cover of natives in the reference sites<br>• 70% of the mean native species richness in the reference sites. | 1. Identify cause.<br>2. Implement approach to remedy cause, which could include:<br>• application of fertilisers or wetting agents etc. if applicable<br>• implement supplementary direct seeding or seedling planting program in accordance with procedures<br>• review rehabilitation process and amend if appropriate.<br>3. Monitor success of approach. | Refer to EMP 134 and EMP 135 | NR | Refer to EMP 134 and EMP 135 |
| EMP 163 | Indicator species in rehabilitation sites. | Twice annually (in May and October). | As determined in accordance with Table. | 1. Identify cause.<br>2. Implement approach to remedy cause, which could include:<br>• application of fertilisers or wetting agents etc. if applicable<br>• implement supplementary direct seeding or seedling planting program in accordance with procedures.<br>• review rehabilitation process and amend if appropriate. | Refer to EMP 134 and EMP 135 | NR | Refer to EMP 134 and EMP 135 |

| Item | Activity and location | Frequency/ timing | Target | Corrective action | Evidence | Status | Comment |
|---|---|---|---|---|---|---|---|
| | | | | 3. Monitor success of approach. | | | |
| EMP164 | Exotic species richness and % cover within rehabilitation sites as outlined in the monitoring procedures. | Twice annually (in May and October). | Exotic flora species:<br>no greater than 10% increase in weed species density/cover/distribution compared to reference sites<br>no Declared Plants present on-site six months following completion of construction.<br>no infested areas as defined in the Weed, Plant Pathogen and Pest Animal Management Sub-plan<br>no local priority areas as defined in the Weed, Plant Pathogen and Pest Animal Management Sub-plan<br>no new weed species present. | 1. Identify cause.<br>2. Identify the weeds, their location and coverage.<br>3. Implement remedy which could include:<br>• implementing a weed control program<br>• reinforcing management actions in the Weed, Plant Pathogen and Pest Animal Management Sub-plan and Rehabilitation Management Sub-plan.<br>4. Monitor success of control. | Refer to EMP 134 and EMP 135 | NR | Refer to EMP 134 and EMP 135 |
| EMP 165 | Erosion within and adjacent to rehabilitation sites. | Opportunistically following heavy rainfall events. | Ensure landform is safe and stable with no erosion occurring 18 months after rehabilitation.<br>Reconstructed landform can withstand exceedance of average rainfall occurrences for a period of 10 years. | 1. Identify cause of erosion.<br>2. Consult expert to determine appropriate remedy which may include:<br>• Installing culverts<br>• Installing stormwater diversion structures.<br>3. Implement remedy.<br>4. Monitor success of remedy. | Refer to EMP 134 and EMP 135 | NR | Refer to EMP 134 and EMP 135<br><br>No erosion evident within or adjacent to Weaber Plain rehabilitation sites. |

*Appendix A Table 21. Aboriginal heritage management actions*

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 166 | Implement an induction program for personnel and contractors/consultants, and an information package for farm owners/managers, both of which containing information on:<br>• significance of Aboriginal heritage and the potential impacts of the project<br>• procedures to report potential new sites<br>• obligations under the *Aboriginal Heritage Act 1972* (WA)<br>• requirements for the protection of known Aboriginal sites. | To ensure protection of known sites of Aboriginal heritage significance in accordance with the requirements of the *Aboriginal Heritage Act 1972* (WA), to improve knowledge of Aboriginal cultural heritage in non-indigenous people associated with the project. | Within one week of personnel commencing work on-site | 2025.KEMP.2a | C | Refer to page 3 of Knox induction. |
| EMP 167 | Document the location of protected areas on development design plans and make available to planners, agents, contractors, and relevant personnel. | To ensure protection of known sites of Aboriginal heritage significance in accordance with the requirements of the *Aboriginal Heritage Act 1972* (WA), to improve knowledge of Aboriginal cultural heritage in | Prior to ground disturbance | 2025.KEMP.167a | C | KAI's Knox Creek Plain previous Final Project Design Plan (FPDP) (Revision C) (KBC 2019) confirms that heritage sites are retained in the buffer areas, as previously surveyed and marked.<br>This carries into the Knox FPDP approved by the EPA in October 2025. |

| Item | Action | Purpose | Timing | Evidence | Status | Comment |
|---|---|---|---|---|---|---|
| EMP 168 | Flag the boundaries of project areas to ensure activities do not intrude into areas where Aboriginal sites are present. | non-indigenous people associated with the project. | Prior to ground disturbance | Not applicable | C | Aboriginal heritage sites are protected within buffer areas. Buffer access is not permitted outside of designated tracks, per earlier action items.<br>Refer to EMP 167 |
| EMP 169 | Place 'No Go' signage along boundaries immediately adjacent to Buffer Areas around protected Aboriginal sites. | | Prior to ground disturbance | Not applicable | C | Aboriginal heritage sites are protected within buffer areas. Buffer access is not permitted outside of designated tracks, per earlier action items.<br>Refer to EMP 167 |
| EMP 170 | If a suspected heritage site is detected follow procedures as outlined in the Heritage Site Detection Procedure. Potential heritage sites include stone/shell scatters (middens), stone tools, rock paintings and engravings, grinding patches, scar trees, ochre sites/quarries, and skeletal remains. | To ensure protection of previously unrecorded Aboriginal heritage sites detected during construction/clearing activities in accordance with the *Aboriginal Heritage Act 1972* (WA). | Ongoing from commencement of ground disturbance | 2025.KEMP.170a | C | Keep Farming referred the proposed borrow pit to MG Corporation for heritage assessment in October 2025. |
| EMP 171 | | | | | | Item not included in Knox EMP |
| EMP 172 | | | | | | Item not included in Knox EMP |
| EMP 173 | The MG Corporation will be briefed on proposed works and work schedules and informed of detailed aspects of the project. | Ensure regular ongoing involvement of the Miriuwung and Gajerrong people in heritage management throughout the life of the project, in accordance with the OFA and OES. | Prior to ground disturbance | 2025.KEMP.170a | C | Refer to EMP 170. |
| EMP 174 | The MG Corporation will be involved in inspections of the Project Area throughout construction (with supporting briefing). | | Quarterly and as required | | C | Refer to EMP 170. |
| EMP 175 | Meet with MG Corporation to discuss broader issues of Aboriginal cultural heritage and heritage protection in and around the buffer, and associated social impact. | | Annually and as required | 2025.KEMP.170a | C | Keep Farming meets with MG Corporation through the Goomig-Knox Management Committee facilitated by DPIRD, as well as meeting on an as-required basis, for example in relation to the borrow pit heritage clearance. |
| EMP 176 | | | | | N/A | Item not included in Knox EMP |

*Appendix A Table 22. Aboriginal heritage monitoring regime and corrective actions*

| Item | Activity and location | Frequency | Target | Corrective action | Evidence | Status Knox | Comment |
|---|---|---|---|---|---|---|---|
| EMP 177 | Signage or temporary fencing/ tape showing heritage site locations. | Daily during clearing and construction | No disturbance to sites not approved to be disturbed under Section 18 of the *Aboriginal Heritage Act 1972* (WA). | Report as Environmental Incident and initiate Incident Procedure, including:<br>• stopping work in the vicinity of the boundary investigating the cause of the disturbance<br>• redefining boundaries if due to inadequate boundary marking<br>• rehabilitating vegetation in the area as required in accordance with the Rehabilitation Management Sub-plan<br>• restore the 'site' (e.g. scatters or middens could have been buried, rock art altered, skeletal remains exposed) – develop a remedial plan in consultation with appointed archaeologist and MG Corporation | Not applicable | C | Clearing in 2025 was limited to the stormwater discharge outlet for the central block on Knox. There are no Aboriginal heritage sites near to that location.<br><br>No Aboriginal heritage incidents reported in 2025. |

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|---|---|---|---|---|---|---|---|
| | | | | • monitoring the success of remedial action.<br>Consult with the Department of Aboriginal Affairs and MG Corporation to determine actions required to restore the site to its original condition. | | | |
| EMP 178 | | | | | | N/A | Item not included in Knox EMP |