

ANNUAL COMPLIANCE REPORT

REPORTING PERIOD: 27 FEBRUARY 2024 TO 10 MAY 2025

EPBC 2015/7436

Document No: NRE-0000-H-RPT-N-0034 Rev 0

Project Name: Nolans Rare Earths Project



REVISION HISTORY

16/05/2025	Rev 0	Issued for DCCEEW submission and public release	G. Calderon Environmental Scientist	Y. Smythe McGuinness S. Environmental Scientist	D. Jordan Environment Manager
Date	Revision	Description	Prepared	Reviewed	Approved

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APPENDICES

Note that the following appendices have not been published to the website due to containing sensitive ecological data.

APPENDIX A – BIODIVERSITY MONITORING DATA

ANNUAL COMPLIANCE REPORT

OPERATER NAME: ARAFURA RARE EARTHS LIMITED

PROJECT NAME: NOLANS RARE EARTHS PROJECT

EPBC REFERENCE: 2015/7436

ECR REPORTING PERIOD: 27 February 2024 to 10 May 2025


DATE REPORT PREPARED: 16/05/2025

DISTRIBUTION: DEPARTMENT OF CLIMATE CHANGE, ENERGY, THE ENVIRONMENT AND WATER (DCCEEW)

The Environmental Annual Compliance Report (ACR) must be endorsed by a senior representative of the company who has the appropriate level of delegation.

Declaration of Accuracy

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

Signed	
Full Name	Tommie van der Walt
Position	Chief Projects Officer
Organisation	Arafura Rare Earths LTD – ABN 22 080 933 455
Date	16 May 2025

1.0 DESCRIPTION OF ACTIVITIES

Report Title	Annual Environmental Compliance Report 2024-25
EPBC Number	2015/7436
Project Name	Nolans Rare Earths Project
Approval Holder	<p><i>Previous Company Name:</i> Arafura Resources Limited <i>Current Company Name:</i> Arafura Rare Earths Limited</p> <p>ACN 080 933 455 - ABN 22 080 933 455</p> <p><i>Head Office:</i> Level 6, 432 Murray St Perth WA 6000 PO Box 5773 St Georges Terrace Perth WA 6831 T: +61 8 6370 2800 E: arafura@arulld.com</p>
Approved Action	To construct and operate an open pit rare earths mine, intermediate processing facility using a phosphoric acid pre-leach process and associated support infrastructure
Location of the Project	Approximately 135 km north-west of Alice Springs, Northern Territory (NT)
Reporting Period	27 February 2024 to 10 May 2025
Report Approved By	Tommie van der Walt
Date of Preparation of the Report	16 May 2025

2.0 PURPOSE OF REPORT

This document is the second Annual Compliance Report for EPBC approval 2015/7436, for the year of 2024-2025. This was granted to Arafura Resources Limited (now operating as Arafura Rare Earths Ltd, hereafter referred to as Arafura) on 11 May 2018 under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (the Original Approval) for the Nolans Rare Earth Project (the Project).

The Original Approval was revised, resulting in variations to the conditions, and reissued on 24 October 2024 (the Revised Approval), during the 2024-2025 reporting period. Condition 11 of the Original Approval which governed the annual compliance report, was revoked and replaced by Condition 35 in the Revised Approval. The wording of Condition 11 of the Original Approval and Condition 35 of the Revised Approval are presented below.

Condition 11 of the EPBC Original Approval:

Within three months of every 12-month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of the management plans as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published.

The commencement of the action was 27 February 2023, therefore the reporting period under the Original Approval was 27 February to 26 February each year.

Condition 35 of the EPBC Revised Approval:

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

Part C of the Revised Approval – Definitions:

Annual Compliance Report period or ACR period means each subsequent 12-month period following the date of this approval decision until the expiry date of this approval, unless otherwise specified in writing by the **Minister**.

The date of the Original Approval decision was 11 May 2018, therefore the reporting period under the Revised Approval is 11 May to 10 May each year.

This compliance report (2024-2025) addresses the compliance of the conditions in both the Original Approval and the Revised Approval for the dates each respective approval was valid. As the Revised Approval was issued during the reporting period, the Original Approval is reported against for the period of 27 February 2027 until 23 October 2024; and the Revised Approval is reported against for the period of 24 October until 10 May. As a result, the reporting period is longer than the usual 12-month period in this case. For the next reporting period (2025-2026) the regular 12-month reporting cadence of 11 May to 10 May will commence and be ongoing.

This report has been prepared in accordance with the *Annual Compliance Report Guidelines, Commonwealth of Australia 2023* (the Guidelines), as outlined in Condition 37 of the Revised Approval, shown below.

Condition 37 of the EPBC revised Approval:

The approval holder must ensure each compliance report is completed to the satisfaction of the Minister and is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.

As noted above, Arafura was issued a variation to the EPBC 2015/7436 approval on 24 October 2024. This variation followed a request submitted to the Commonwealth Department of Climate Change, Energy, the Environment, and Water (DCCEEW, the Department) on 25 March 2024 to amend Condition 8 of the Original Approval. The variation allows for the phased approval of Environmental Management Plans (EMPs) required under Conditions 2, 3, 4, 5, and 7 of the Original Approval, prior to the commencement of construction and/or specific activities. This now stages the approval of the required management plans before the commencement of the relevant activities.

3.0 ACTIVITY SUMMARY

Construction activities (the Action) at the Project site commenced with early construction works on 27 February 2023 and continued until mid-October 2023, when operations were temporarily suspended. Works have not recommenced since that time; hence no construction or others work activities were carried out at the Project site during the reporting period.

Since mid-October 2023, onsite activities have focused on continuing to collect baseline monitoring data to meet the environmental requirements outlined in the approved management plans. As well as site security and maintenance activities.

Full construction and resumption of the action is expected to proceed once the necessary approvals and financing are secured, and the Final Investment Decision (FID) is announced.

4.0 DESIGNATION OF COMPLIANCE

A compliance table has been prepared for both the Original Approval (Table 5—1) valid until 23 October 2024; and the Revised Approval (Table 5—2) valid from 24 October 2024 onwards (refer to Section 5.0). Each approval condition has been assigned a compliance status in accordance with the Guidelines, as detailed in Table 4—1 below.

Table 4—1 Designation of Compliance

Designation	Description
Compliant	'Compliant' 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 and other measures, have not been met.
Not Applicable	A designation of 'Not Applicable' must be given where the requirements of a condition or elements of a 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.

5.0 COMPLIANCE TABLE

An individual compliance table has been created to address all conditions of both the Original Approval and the Revised Approval, as detailed below:

- Table 5—1 addresses compliance with the conditions of the Original Approval for the reporting period from 27 February 2024 (the start of the annual compliance period under the Original approval) to 23 October 2024 (the last date the Original Approval conditions were valid).
- Table 5—2 addresses compliance with the conditions of the Revised Approval from the approval issue date of 24 October 2024 to 10 May 2025 (the end date of the reporting period under the Revised Approval).

Table 5—1 Compliance Table EPBC 2015/7436 Original Approval (issued 11 May 2018) for the period 27 February 2024 – 23 October 2024

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
1.	The approval holder must not clear more than 4530 hectares of vegetation within the project area, including no more than: <ul style="list-style-type: none"> i. 267 hectares of Black-footed Rock-wallaby habitat, ii. 123 hectares of Great Desert Skink habitat, and iii. 125 hectares of Brush-tailed Mulgara habitat. 	Compliant	No clearing activities were undertaken during the reporting period. Previous clearing activities were reported in the previous Annual Compliance Report (2023-2024). Clearing undertaken at the Project site to date has been minimal and is well within the limits stipulated in this Condition.
2.	To manage the impacts of groundwater drawdown, the approval holder must submit to the Minister for approval, a Water Abstraction Management Plan that meets the following requirements of Assessment Report 84: <ul style="list-style-type: none"> i. a) to i) of recommendation 3, ii. a) to c) of recommendation 4, iii. a) to g) of recommendation 5, and iv. a) to h) of recommendation 6. 	Compliant	The Water Abstraction Management Plan (WAMP) (Rev 3.4) was approved by the Minister during the reporting period on 14 May 2024. The WAMP meets the requirements of the NT Environment Protection Authority (NT EPA) Environmental Impact Assessment Report 84 issued to Arafura on 21 December 2017 (referred to as Assessment Report 84) as stipulated in this Condition. The approved WAMP is publicly available on Arafura's website: here .
3.	To manage impacts on surface water flow and volume, the approval holder must submit to the Minister for approval, a Kerosene Camp Creek Management Plan that meets requirements a) to d) of recommendation 7 of Assessment	Not Applicable	Planning and design of the Kerosene Camp Creek diversion and preparation of the management plan was progressed during the reporting period, and is ongoing. The management plan is being prepared in accordance with the requirements of Assessment Report 84, as stipulated in this Condition. This EMP was not submitted for approval during the reporting period, and hence this

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	Report 84.		Condition was not applicable. The staging of this EMP was the subject of the application to amend the Original Approval.
4.	To manage contaminants in the waste rock dumps, tailings storage facility, and residue storage facility, the approval holder must submit to the Minister for approval, an Acid and Metalliferous Drainage Management Plan that meets requirements a) to c) of recommendation 8 of Assessment Report 84. The design of the waste storages, and any works undertaken at the waste storages must be administered by a qualified and experienced independent certified engineer.	Not Applicable	Detailed planning and design of the waste rock dumps, tailings storage facility, and residue storage facility were progressed during the reporting period, and is ongoing. The Acid and Metalliferous Drainage Management Plan will be prepared in accordance with the requirements of Assessment Report 84, and administered by an independent certified engineer, once this is complete. This EMP was not submitted for approval during the reporting period, and hence this Condition was not applicable. The staging of this EMP was the subject of the application to amend the Original Approval.
5.	To manage the impacts on terrestrial fauna and flora, the approval holder must submit to the Minister for approval, a Biodiversity Management Plan that meets requirements a) to h) of recommendation 11 of Assessment Report 84.	Compliant	The Biodiversity Management Plan (BMP) (Rev 4.0) was updated and submitted to the Minister for approval during the reporting period, on 17 May 2024. The BMP meets the requirements of Assessment Report 84 as stipulated in this Condition. See Table 5—2 below for details of approval under the Revised Approval.
6.	Surveys required under condition 5 of this approval must be undertaken in accordance with survey guidelines and by a suitably qualified expert. Buffers of	Compliant	Annual biodiversity monitoring surveys was undertaken during the reporting period in accordance with the Biodiversity Management Plan approved under Condition 5. All surveys were undertaken in accordance with the relevant survey guidelines by a suitably qualified expert. Buffers of 200 m were applied to all Great Desert Skink

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	at least 200 meters must be applied to any additional Great Desert Skink warren identified during surveys required under condition 5 of this approval.		warrens identified during these surveys. See Section 6.0 below for details.
7.	<p>To manage the containment of radionuclides and radiation protection of people and non-human biota, the approval holder must submit to the Minister for approval a Radiation Protection Management Plan and a Radioactive Waste Management Plan that meet requirements of:</p> <ul style="list-style-type: none"> i. a) to b) of recommendation 15, and ii. e) and g) of recommendation 16 of Assessment Report 84. <p>The Radiation Protection Management Plan and the Radioactive Waste Management Plan must be developed by a suitably qualified expert based upon guidance material from ARPANSA.</p>	Compliant	<p>During the reporting period Arafura requested the consolidation of the Radiation Protection and Management Plan, and the Waste Management Plan, into one plan. This was agreed, as reflected in the Revised Approval (see Condition 7 within Table 5—2 below).</p> <p>Preparation of a combined Radiation Protection and Radioactive Waste Management Plan (RPRWMP) was undertaken during the reporting period. The plan was developed in accordance with the requirements of Assessment Report 84, ARPANSA guidance material, and by a suitably qualified expert, as stipulated in this Condition. See Table 5—2 below for details of submission under the Revised Approval.</p>
8.	The approval holder must not commence the action until the management plans required by conditions 2, 3, 4, 5 and 7 of this approval, are approved by the Minister.	Compliant	<p>Previous non-compliances under this Condition (during the previous reporting period 2023-2024) have now been rectified. No site works were undertaken during this reporting period.</p> <p>All approved EMPs were implemented once approved by the Minister (this included the WAMP for this reporting period, as required under Condition 2). As well as</p>

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	Once approved by the Minister, the management plans must be implemented.		proactive implementation of the BMP (as required under Condition 5) to collect baseline data, although approval was pending at the time.
9.	Within 10 days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.	Compliant	This condition was met during the previous reporting period (2023-2024). Notification of the commencement of the action was made via email on 07 March 2023, within 10 business days following the action's commencement on 27 February 2023. This is detailed in the previous Annual Compliance Report 2023-24 and confirmed in the ' <i>Commencement of the Action Letter</i> ' issued by the Department on 26 May 2023.
10.	The approval holder 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. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	Compliant	Arafura maintains accurate records substantiating all activities associated with or relevant to the conditions of this approval. Including the measures taken to implement the EMPs required by this approval. These records are summarised in this report, and are available upon request by the Department. No requests for records were received from the Department, or audits conducted, during the reporting period.
11.	Within three months of every 12-month anniversary of the commencement of the action, the approval holder must publish a report on their website	Compliant	This report has been prepared to meet this Condition. It details compliance with the Conditions of approval(s) and implementation of the relevant EMPs. The reporting period under the Revised Approval has been changed (see Section 2.0 above for details). Hence the reporting period is later than the 12-month anniversary

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	addressing compliance with each of the conditions of this approval, including implementation of the management plans as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published.		of the commencement of the action in this case. This is, however, in compliance with the current Revised Approval (see Table 5—2 below). This report will be published on Arafura's website together with all previous annual compliance reports: here . A notification will be provided to the Department at the time of publication. This was undertaken for the previous compliance report (2023-2024), which was published on the website and notification sent on 27 May 2024.
12.	Within 30 days after the completion of the action, the approval holder must advise the Department in writing of the actual date of completion and provide a map clearly defining the date, location and boundaries of the clearing footprint within the project area and be accompanied with a shapefile.	Not Applicable	This condition is not applicable as the action was not completed during the reporting period.
13.	Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted, and a report submitted to the Minister. The approval holder must not commence the audit until the independent auditor and audit criteria have been approved by the Minister in writing. The audit report must address the criteria to the satisfaction of the	Not Applicable	This condition is not applicable as no direction for an independent audit was issued by the Minister during the reporting period.

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Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	Minister.		
14.	If, at any time after five years from the date of this approval, the approval holder has not commenced the action, then the approval holder must not commence the action without the written agreement of the Minister.	Not Applicable	This condition is not applicable. As per Condition 9 above, the action was commenced on 27 February 2023, within five years of the issue date of the Original Approval, which was on 11 May 2018.

Table 5—2 Compliance Table EPBC 2015/7436 Revised Approval (issued 24 October 2024) for the period 24 October 2024 – 10 May 2025

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
1.	The approval holder must not clear more than 4530 hectares of vegetation within the project area, including no more than: <ul style="list-style-type: none"> i. 267 hectares of Black-footed Rock-wallaby habitat, ii. 123 hectares of Great Desert Skink habitat, and iii. 125 hectares of Brush-tailed Mulgara habitat. 	Compliant	No clearing activities were undertaken during the reporting period. Previous clearing activities were reported in the previous Annual Compliance Report (2023-2024). Clearing undertaken at the Project site to date has been minimal and is well within the limits stipulated in this Condition.
2.	To avoid impacts of groundwater drawdown on protected matters, the approval holder must submit to the department for the Minister's approval, a	Compliant	As outline in Table 5—1 above, the WAMP was approved under the Original Approval on 14 May 2024. The WAMP meets the requirements of Assessment Report 84, as stipulated in this Condition.

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	<p>Water Abstraction Management Plan that meets the following requirements of Assessment Report 84:</p> <ul style="list-style-type: none"> i. a) to i) of recommendation 3, ii. a) to c) of recommendation 4, iii. a) to g) of recommendation 5, and iv. a) to h) of recommendation 6 <p>The approval holder must commence abstraction of groundwater only in accordance with Condition 8 of this instrument.</p>		<p>No water abstraction activities were carried out during the reporting period, however the monitoring requirements of the WAMP were implemented, as detailed in Section 6.0 below.</p>
3.	<p>To avoid impacts on surface water flow and volume affecting protected matters, the approval holder must submit to the department for the Minister's approval, a Kerosene Camp Creek Management Plan that meets requirements a) to d) of recommendation 7 of Assessment Report 84.</p> <p>The approval holder must commence construction of the Kerosene Camp Creek diversion only in accordance with Condition 8 of this instrument.</p>	Not Applicable	<p>Planning and design of the Kerosene Camp Creek diversion and preparation of the management plan was progressed during the reporting period, and is ongoing. The management plan is being prepared in accordance with the requirements of Assessment Report 84, as stipulated in this Condition.</p> <p>This EMP was not submitted for approval during the reporting period, and hence this Condition was not applicable.</p> <p>No construction activities related to the Kerosene Camp Creek diversion were carried out during the reporting period. Such activities will not commence until the plan is approved, in accordance with Condition 8.</p>
4.	<p>To prevent contaminants in the waste rock dumps, tailings storage facility and</p>	Not Applicable	<p>Detailed planning and design of the waste rock dumps, tailings storage facility, and residue storage facility were progressed during the reporting period, and is ongoing.</p>

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	<p>residue storage facility impacting protected matters, the approval holder must submit to the department for the Minister's approval, an Acid and Metalliferous Drainage Management Plan that meets requirements a) to c) of recommendation 8 of Assessment Report 84.</p> <p>The design of the waste storages, and any works undertaken at the waste storages must be administered by an independent certified engineer.</p> <p>In association with the Acid and Metalliferous Drainage Management Plan, the approval holder must commence construction of the Kerosene Camp Creek diversion and waste storages only in accordance with Condition 8 of this instrument.</p>		<p>Once the detailed designs are complete, the Acid and Metalliferous Drainage Management Plan will be prepared in accordance with the requirements of Assessment Report 84, and administered by an independent certified engineer, as stipulated in this Condition.</p> <p>This EMP was not submitted for approval during the reporting period, and hence this Condition was not applicable.</p> <p>No construction activities related to the waste storages or Kerosene Camp Creek diversion were undertaken during the reporting period. Such activities will not commence until the plan is approved, in accordance with Condition 8.</p>
5.	<p>To manage the impacts of the Action on protected matters under s18 and s18A of the EPBC Act, the approval holder must submit to the department for the Minister's approval, a Biodiversity Management Plan that meets requirements a) to h) of recommendation 11 of Assessment Report 84.</p> <p>The Biodiversity Management Plan must</p>	Compliant	<p>As outlined in Table 5—1 above, the revised BMP (Rev 4.0) was submitted to the Department for the Minister's approval on 17 May 2024.</p> <p>Subsequently, during this reporting period, the BMP Rev 4.0 received the Minister's approval on 24 October 2024, concurrent with issue of the Revised Approval.</p> <p>The BMP meets the requirements of recommendation 11 of Assessment Report 84, and details the surveys to be undertaken, and 200 m buffers to be established around identified Great Desert Skink warrens, as stipulated in this Condition.</p> <p>The approved BMP is publicly available on Arafura's website: here.</p> <p>No clearing activities were carried out during the reporting period, however the</p>

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	<p>specify that all surveys will be undertaken by a suitably qualified expert in accordance with survey guidelines and that no clearing or construction will occur within 200 metres of any Great Desert Skink warren.</p> <p>In association with the Biodiversity Management Plan, the approval holder must commence clearing only in accordance with condition 8 of this approval.</p>		monitoring requirements of the BMP were implemented, as detailed in Section 6.0 below.
6.	Revoked.	Not Applicable	Revoked condition, not applicable to the reporting period.
7.	<p>To ensure that radionuclides and radiation do not harm people and nonhuman biota, the approval holder must submit to the department for the Minister's approval a Radiation Protection and Waste Management Plan that meet requirements of:</p> <ul style="list-style-type: none"> i. a) to b) of recommendation 15, and ii. and g) of recommendation 16 of Assessment Report 84. <p>The Radiation Protection and Waste Management Plan must be developed by a suitably qualified expert based upon guidance material from ARPANSA.</p>	Compliant	<p>During the reporting period, Arafura revised the RPRWMP in response to feedback received from the Department. With submission of the revised RPRWMP Rev 4.0 to the Department for the Minister's approval on 19 March 2025. The plan is currently under assessment by the Department at the time of report preparation.</p> <p>The plan was developed in accordance with the requirements of Assessment Report 84, ARPANSA guidance material, and by a suitably qualified expert, as stipulated in this Condition.</p> <p>No construction activities were undertaken during the reporting period, including works with the potential to cause elevated radiation exposure. No such works will commence on site until this plan is approved by the Minister, in accordance with Condition 8.</p>

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	In association with the Radiation Protection and Waste Management Plan, the approval holder must commence construction of the action only in accordance with Condition 8 of this instrument.		
8.	<p>i. The approval holder:</p> <p>a. must not commence clearing until the management plan required by condition 5 of this approval is approved by the Minister; and,</p> <p>b. must not commence abstraction of groundwater until the management plan required by Condition 2 of this approval is approved by the Minister. Groundwater extraction must occur only as permitted in this condition at (e); and,</p> <p>c. must not commence any construction of the Kerosene Camp Creek diversion unless the management plan required by condition 3 has been approved by the Minister in writing; and</p> <p>d. must not commence any construction of the Kerosene</p>	Compliant	<p>No clearing, construction, or abstraction of groundwater was undertaken during the reporting period. Compliance with each component of this Condition is outlined below:</p> <p>i.</p> <p>a. The BMP Rev 4.0 received Ministerial approval during the reporting period on 24 October 2024, satisfying the requirements of Condition 5. Clearing activities are therefore now able to be recommenced once the Project is ready to do so.</p> <p>b. The WAMP Rev 3.4 received Ministerial approval on 14 May 2024, satisfying the requirements of Condition 2. Groundwater extraction activities are therefore now able to be recommenced when the Project is ready to do so.</p> <p>c. The Kerosene Camp Creek Management Plan needs to be reviewed and finalised in accordance with the requirements of Condition 3. Construction of the Kerosene Camp Creek diversion is not able to commence prior to approval of this plan by the Minister.</p> <p>d. The Acid and Metalliferous Drainage Management Plan needs to be reviewed and finalised in accordance with the requirements of Condition 4. Construction of the waste storages and the Kerosene Camp Creek diversion is not able to commence prior to approval of this plan by the Minister.</p> <p>e. The RPRWMP was submitted to the Department for the Minister's</p>

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	<p>Camp Creek diversion and waste storages unless the management plan required by Condition 4 has been approved by the Minister in writing; and,</p> <p>e. must not commence any construction within the scope of the approved action at either the Mine site, Processing site or Borefield area, or any other area, unless the management plan required by condition 7 has been approved by the Minister in writing. Construction includes, but is not limited to, the open pit mine, the intermediate processing facility, associated processing support or Borefield infrastructure, the Kerosene Camp Creek diversion or waste storages. Associated processing support infrastructure or construction does not, for this condition, include demountable infrastructure associated with a mine camp.</p> <p>ii. Once approved by the Minister, the management plans must be implemented.</p>		<p>approval. Construction works are not able to proceed until the plan receives approval.</p> <p>ii. All EMPs approved to date have been implemented upon receipt of approval. The 'active' management plans that were approved and hence implemented during the reporting period included the WAMP and the BMP. See Section 6.0 below for details of their implementation.</p> <p>The action previously commenced on 27 February 2023 and continued until mid-October 2023, as detailed in the previous Annual Compliance Report 2023–24. The action did not re-commence during the reporting period. The action is planned to re-commence pending FID and once approval of the required EMPs is achieved for the respective scopes of works.</p>

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Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
9.	Revoked.	Not Applicable	Revoked condition, not applicable to the reporting period.
10.	Revoked.	Not Applicable	Revoked condition, not applicable to the reporting period.
11.	Revoked.	Not Applicable	Revoked condition, not applicable to the reporting period.
12.	Revoked.	Not Applicable	Revoked condition, not applicable to the reporting period.
13.	Revoked.	Not Applicable	Revoked condition, not applicable to the reporting period.
14.	Revoked.	Not Applicable	Revoked condition, not applicable to the reporting period.
15.	The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister or as subsequently revised in accordance with the following conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of any previous version of the action management plan.	Not Applicable	No applications were made to the Minister to vary an action management plan during the reporting period. This Condition was therefore not applicable to the reporting period.
16.	The approval holder may choose to revise an action management plan approved by the Minister under conditions 2, 3, 4, 5 or 7, or as subsequently revised in accordance with these conditions, without submitting it for approval under section	Not Applicable	None of the approved action management plans were revised during the reporting period following their approval. This Condition was therefore not applicable to the reporting period.

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	143A of the EPBC Act, if the taking of the Action in accordance with the RAMP would not be likely to have a new or increased impact.		
17.	<p>If the approval holder makes the choice under condition 16 to revise an action management plan without submitting it for approval, the approval holder must:</p> <ul style="list-style-type: none"> a) Notify the department electronically that the approved action management plan has been revised and provide the department with: <ul style="list-style-type: none"> i. An electronic copy of the RAMP. ii. An electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP. iii. An explanation of the differences between the approved action management plan and the RAMP. iv. The reasons the approval holder considers that taking the Action in accordance with the RAMP would not be likely to have a new or increased impact. v. Written notice of the date on 	Not Applicable	The choice to implement a RAMP under Condition 16 has not been made by Arafura to date. This Condition was therefore not applicable to the reporting period.

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	<p>which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the department.</p> <p>b) Subject to condition 19, implement the RAMP from the RAMP implementation date.</p>		
18.	The approval holder may revoke its choice to implement a RAMP under condition 16 at any time by giving written notice to the department. If the approval holder revokes the choice under condition 16, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under Condition 16.	Not Applicable	The choice to implement a RAMP under Condition 16 has not been made by Arafura to date. This Condition was therefore not applicable to the reporting period.
19.	<p>If the Minister notifies the approval holder that the Minister is satisfied that the taking of the Action in accordance with the RAMP would be likely to have a new or increased impact, then:</p> <p>a) Condition 16 does not apply, or ceases to apply, in relation to the</p>	Not Applicable	The choice to implement a RAMP under Condition 16 has not been made by Arafura to date; and no such notices were received by the Minister during the reporting period. This Condition was therefore not applicable to the reporting period.

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	RAMP. b) The approval holder must implement the action management plan specified by the Minister in the notice.		
20.	At the time of giving the notice under Condition 19 the Minister may also notify that for a specified period of time, Condition 16 does not apply for one or more specified action management plans. Note: Conditions 16-20 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised action management plan, at any time, to the Minister for approval.	Not Applicable	The choice to implement a RAMP under Condition 16 has not been made by Arafura to date; and no such notices were received by the Minister during the reporting period. This Condition was therefore not applicable to the reporting period.
21.	Wherever these conditions require the approval holder to submit any plan to the department, all such plans must be submitted to the department electronically.	Compliant	All management plans submitted by Arafura to date have been submitted electronically. This includes submission of: <ul style="list-style-type: none"> The approved WAMP Rev 3.4 submitted via email on 21 February 2024. Refer to Condition 2 under the Original Approval in Table 5—1 above. The approved BMP Rev 4.0 submitted via email on 17 May 2024. Refer to Condition 5 under the Original Approval in Table 5—1 above. The current RPRWMP Rev 4.0 submitted via email on 19 March 2025. Refer to Condition 7 above.

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
22.	<p>Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 30 business days of the date:</p> <ul style="list-style-type: none"> a. of this approval, if the version of the plan to be implemented is specified in these conditions, and b. the plan is approved by the Minister in writing, if the plan requires the approval of the Minister. 	Compliant	<p>The Revised Approval was issued by the Department on 24 October 2024.</p> <p>The requirement to publish the EMPs to the Arafura website within 30 business days was a new requirement of the Revised Approval.</p> <p>At the time of issue of the Revised Approval, there was one EMP that had been previously approved (the WAMP); and one EMP that was approved concurrently with the issue of the Revised Approval (the BMP).</p> <p>Both the WAMP and BMP approved plans were published to the Arafura website on 2 December 2024, which was within the required 30 business days from receipt of approval.</p> <p>These plans are available on Arafura's website: here.</p> <p>This will be undertaken for all subsequent plans following Ministerial approval.</p>
23.	The approval holder must keep all plans published on the website, in a format that is easily accessible and downloadable, from the first date which that plan must be published and until the expiry date of this approval. This requirement applies to all current and superseded versions of plans.	Compliant	<p>The EMPs published on Arafura's website as required under Condition 22 above remain publicly available on the website. They will continue to remain published until the expiry of this approval, including all current and superseded versions of the plans.</p> <p>These plans are accessible: here.</p>
24.	The approval holder is required to exclude or redact sensitive ecological data from any version of a plan before that plan is published on the website or otherwise provided to a member of the public. If sensitive ecological data is excluded or redacted from a plan, the approval holder must notify the	Compliant	<p>Sensitive ecological data was redacted in the published versions of the EMPs (the WAMP and BMP to date) in accordance with this Condition.</p> <p>Notification of the redactions made to the published versions was sent to the Department via email on 6 December 2024.</p>

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	department in writing what exclusions and redactions have been made in the version published on the website.		
25.	The approval holder must notify the department in writing of any proposed change to the relevant Northern Territory environmental approval under the Territory/ Commonwealth bilateral assessment that may relate to protected matters within 2 business days of formally proposing such a change and within 5 business days of becoming aware of any proposed change.	Not Applicable	No proposed changes were made to the relevant Northern Territory environmental approval under the Territory/Commonwealth bilateral assessment that related (or may have related) to protected matters during the reporting period. This Condition was therefore not applicable to the reporting period.
26.	The approval holder must notify the department in writing of any change to the relevant Northern Territory environmental approval under the Territory/ Commonwealth bilateral assessment conditions that may relate to protected matters, within 5 business days of such a change to conditions coming into effect. Such notification must include a copy of the changed conditions to the relevant Northern Territory environmental approval under the Territory/ Commonwealth bilateral assessment showing what changes have been made.	Not Applicable	No changes were made to the relevant Northern Territory environmental approval under the Territory/Commonwealth bilateral assessment that related (or may have related) to protected matters during the reporting period. This Condition was therefore not applicable to the reporting period.
27.	The approval holder must notify the	Compliant	Notification of commencement of the Action was made electronically to the

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Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	department electronically of the date of commencement of the Action, within 5 business days following commencement of the Action.		Department during the previous reporting period (2023-2024) under the Original Approval. Condition 9 of the Original Approval required this notification to be made within 10 days of commencement of the Action which was complied with (see Table 5—1 above); hence the 5-day period did not apply at the time.
28.	The approval holder must not commence the Action later than 5 years after the date of this approval decision.	Compliant	The action commenced on 27 February 2023, which was within five years of the issue date of the Original Approval on 11 May 2018. This Condition has therefore been met.
29.	The approval holder must notify the department electronically of the date of commencement of construction within 5 business days.	Not Applicable	No construction activities were undertaken during the reporting period. This Condition is therefore not applicable to the reporting period. Arafura will notify the Department within 5 business days of the re-commencement of construction activities at the Project site.
30.	The approval holder must maintain accurate and complete compliance records and document the procedure for recording and storing compliance records.	Compliant	Arafura maintains accurate and complete compliance records; and has developed a documented process and requirements for recording and storing compliance records. Arafura maintains an Environmental and Social Management System which includes requirements for and implementation of the control and storage of compliance records. The process is described within the Environmental and Social Management System Framework [NRE-0000-H-PLN-N-0001 Rev 1.0].
31.	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request. Note: Compliance records may be subject to audit by the department, or by an independent auditor in accordance with section 458 of the EPBC Act, and/or be used to verify compliance with the	Not Applicable	No request for compliance records or audits was made by the Department during the reporting period; therefore, this condition was not applicable. Compliance records will be provided upon request by the Department.

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	conditions. Summaries of the results of an audit may be published on the department's website or through the general media.		
32.	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the <i>Guidelines for biological survey and mapped data</i> , Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing.	Compliant	<p>Monitoring data prepared and reported during the reporting period that relates to this Condition includes the ecological data collected in compliance with the BMP. Under the Revised Approval to date, the annual biodiversity monitoring of the Great Desert Skink and of the Black-footed Rock-wallaby was undertaken for the 2024-2025 period.</p> <p>The Great Desert Skink monitoring data was prepared and reported in accordance with the <i>Guidelines for biological survey and mapped data</i> (Commonwealth of Australia 2018), as specified within this Condition (see APPENDIX A).</p> <p>The Black-footed Rock-wallaby monitoring data is currently undergoing analysis and reporting is in preparation – which is also being undertaken in accordance with these guidelines.</p> <p>No additional guidelines or directions have been specified by the Minister at this time.</p>
33.	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the <i>Guide to providing maps and boundary data for EPBC Act projects</i> , Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.	Compliant	<p>Monitoring data prepared and reported during the reporting period that relates to this Condition includes the ecological data collected in compliance with the BMP. Under the Revised Approval to date, the annual biodiversity monitoring of the Great Desert Skink and of the Black-footed Rock-wallaby was undertaken for the 2024-2025 period.</p> <p>The Great Desert Skink monitoring data was prepared and reported in accordance with the <i>Guide to providing maps and boundary data for EPBC Act projects</i> (Commonwealth of Australia 2021), as specified within this Condition (see APPENDIX A).</p> <p>The Black-footed Rock-wallaby monitoring data is currently undergoing analysis and reporting is in preparation – which is also being undertaken in accordance with this guide.</p> <p>No additional guidelines or directions have been specified by the Minister at this time.</p>

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
34.	The approval holder must submit all monitoring data (including sensitive ecological data), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 20 business days of the next anniversary of the date of this approval decision except where otherwise specified in a plan.	Compliant	<p>The timeframe of this Condition aligns with the timeframe for the preparation and publication of the ACR (this report). The monitoring data required under this Condition will be submitted to the Department at the time of notification of the publication of this report.</p> <p>The monitoring data collected in relation to this Condition during the reporting period includes the annual biodiversity monitoring conducted in compliance with the BMP. Reports have been prepared of the biodiversity monitoring conducted during 2023-2024 (EcOz 2024); and for the Great Desert Skink during 2024-2025 (EcOz 2025). These reports include detail of the surveys undertaken, the species occurrence, maps, etc. These reports together with the relevant spatial data will be submitted to the Department at the time of notification.</p> <p>The 2024-2025 annual survey data for the Black-footed Rock-wallaby has not yet been prepared or reported. This data will be supplied to the Department once it is available.</p>
35.	The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period).	Compliant	<p>This ACR has been prepared to fulfill this Condition, as well as Condition 11 of the Original Approval (refer to Table 5—1 above).</p> <p>This report covers the following reporting periods under each approval:</p> <ul style="list-style-type: none"> from 27 February 2023 (the start date of the annual compliance period under the Original approval) to 23 October 2024 (the last date the Original Approval was valid); and from 24 October 2024 (issued date of the Revised Approval) to 11 May 2025 (the end date of the ACR period under the Revised Approval).
36.	The approval holder must ensure each compliance report includes: a) accurate and complete details of compliance and any noncompliance with: a. each condition attached to this approval decision, and	Compliant	<p>This ACR has been prepared to meet the requirements of this Condition, as below:</p> <ol style="list-style-type: none"> Compliance with each Condition is covered within this Table 5—2. Compliance with the commitments made in the EMPs is covered within Section 6.0 of this report A schedule of the EMPs in effect during the reporting period is summarised in

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	<ul style="list-style-type: none"> b. all commitments made in each plan, c. a schedule of all plans in effect in relation to these conditions during the ACR period, d. accurate and complete details of how each plan was implemented during the ACR period, and e. if any incident occurred, accurate and complete details of each incident. 		<p>Table 6—1 below</p> <ul style="list-style-type: none"> d. Details of EMP implementation are provided in Section 6.0 of this report e. Details of minor environmental incidents that occurred during the reporting period are addressed in Section 8.0 of this report. These incidents do not, however, meet the definition of an ‘Incident’ under the Revised Approval, as they do not relate to protected matters.
37.	The approval holder must ensure each compliance report is completed to the satisfaction of the Minister and is consistent with the <i>Annual Compliance Report Guidelines, Commonwealth of Australia 2023</i> .	Compliant	This Annual Compliance Report has been prepared in accordance with the <i>Annual Compliance Report Guidelines, Commonwealth of Australia 2023</i> . Any updates required to achieve the satisfaction of the Minister will be made upon request.
38.	<p>The approval holder must, within 20 business days following the end each ACR period, in a format that is easily accessible and downloadable, publish on the website:</p> <ul style="list-style-type: none"> a) each compliance report, and b) a shapefile showing all clearing of protected matters, and their habitat, undertaken within the ACR period. 	Compliant	<p>The end of the ACR period under the Revised Approval is 10 May 2025. This report will be made publicly available on or before 6 June 2025, which is 20 business days following the end of the ACR period.</p> <p>The report will be published in pdf format on Arafura’s website: here.</p> <p>As outlined in Condition 1, no clearing activities were undertaken during the reporting period. Accordingly, no spatial data (shapefiles) are required to be published for this reporting period.</p>

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
39.	<p>The approval holder must:</p> <ul style="list-style-type: none"> a) Exclude or redact sensitive ecological data from each compliance report and shapefile published on the website or otherwise provided to a member of the public. b) If sensitive ecological data is excluded or redacted from a version of a compliance report published or otherwise provided to a member of the public, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public. c) If sensitive ecological data is excluded or redacted from a version of a shapefile published or otherwise provided to a member of the public, submit the full shapefile to the department within 5 business days of its 	Compliant	<p>Sensitive ecological data will be redacted prior to publication of this report, and related shapefiles removed.</p> <p>The full report and associated shapefiles will be provided to the Department within five days of publication of this report – with details provided of the redactions made to the public version – as specified in this Condition.</p>

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	publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.		
40.	The approval holder must notify the department electronically, within 5 business days of each date of publication that the compliance report has been published on the website. In this notification, the approval holder must provide the department with the web address for where the compliance report and related shapefile are published on the website.	Compliant	Notification to the Department regarding the publication of this compliance report will be made electronically within five business days as outlined in this Condition.
41.	The approval holder must keep each compliance report and related shapefile published on the website from the first date which that compliance report must be published and until the expiry date of this approval. Note: Compliance reports may be published on the department's website	Compliant	All ACRs to date are publicly available on Arafura's website: here and will remain publicly accessible until the expiry date of this approval, in accordance with this Condition. This will be undertaken for all future ACRs and any relevant shapefiles as the Project progresses.
42.	The approval holder must notify the department electronically, within 2 business days of becoming aware of any	Not Applicable	No 'Events' occurred during the reporting period as defined within the Revised Approval (including no potential or actual non-compliances with the conditions of approval; or environmental incidents resulting in potential or actual harm to a

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	<p>event. The approval holder must specify in each notification:</p> <ul style="list-style-type: none"> a) any condition or commitment made in a plan which has been or may have been not complied with, b) a short description of the event, and c) the location (if applicable, including co-ordinates), date and time of the event. 		protected matter). This condition is therefore not applicable to the reporting period.
43.	<p>The approval holder must provide to the department in writing, within 12 business days of becoming aware of an event, the details of that event. The approval holder must specify:</p> <ul style="list-style-type: none"> a) all corrective measures and investigations which the approval holder has already taken in respect of the event, b) the potential impacts of the event, c) the method and timing of any corrective measures that the approval holder proposes to undertake to address the event, and 	Not Applicable	No 'Events' occurred during the reporting period as defined within the Revised Approval (including no potential or actual non-compliances with the conditions of approval; or environmental incidents resulting in potential or actual harm to a protected matter). This condition is therefore not applicable to the reporting period.

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	d) any variation of these conditions or revision of a plan that will be required to prevent recurrence of the event and/or to address its consequences.		
44.	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period.	Not Applicable	As defined in the Revised Approval, the 'Audit period' means <i>each subsequent five-year period following the commencement of the Action until the expiry date of this approval unless otherwise specified in writing by the Minister</i> . The Action commenced on 27 February 2023. The first audit period therefore ends on 26 February 2028 (unless otherwise specified in writing by the Minister). An audit will be undertaken at such time. This condition is therefore not applicable to the reporting period.
45.	The approval holder must submit details of the proposed independent auditor and their qualifications to the department within 10 business days following the end of each audit period.	Not Applicable	No audit was required during the reporting period. This condition is therefore not applicable to the reporting period.
46.	The approval holder must ensure the scope of each independent audit is sufficient to determine the compliance status for each condition of approval, and each commitment made in each plan.	Not Applicable	No audit was required during the reporting period. This condition is therefore not applicable to the reporting period.
47.	The approval holder must ensure the criteria for each independent audit and the undertaking of each independent audit are consistent with the <i>Environment Protection and Biodiversity Conservation</i>	Not Applicable	No audit was required during the reporting period. This condition is therefore not applicable to the reporting period.

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	<i>Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019.</i>		
48.	The approval holder must submit an audit report to the department for written agreement from the department within 3 months following the end of each audit period, or as otherwise directed by the Minister in writing.	Not Applicable	No audit was required during the reporting period. This condition is therefore not applicable to the reporting period.
49.	The approval holder must ensure each audit report is completed to the satisfaction of the Minister and is consistent with the <i>Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019.</i>	Not Applicable	No audit was required during the reporting period. This condition is therefore not applicable to the reporting period.
50.	The approval holder must publish each audit report on the website, in a format that is easily accessible and downloadable, within 10 business days of the date of the department agrees to the audit report in writing.	Not Applicable	No audit was required during the reporting period. This condition is therefore not applicable to the reporting period.
51.	The approval holder must notify the department within 5 business days of the date the audit report is published on the website. In this notification, the approval holder must provide the department with	Not Applicable	No audit was required during the reporting period. This condition is therefore not applicable to the reporting period.

Condition Number	Condition	Is the Project Compliant with this Condition?	Evidence/comments
	the web address for where the audit report is published on the website.		
52.	The approval holder must keep each audit report published on the website from the first date which that audit report must be published and until the expiry date of this approval.	Not Applicable	No audit report has been required to be completed to date. This condition is therefore not applicable to the reporting period.
53.	Within 20 business days after the completion of the Action, and, in any event, at least 20 business days before this approval expires, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data. The approval holder must submit any spatial data that comprises completion data as a shapefile	Not Applicable	The Action was not completed during this reporting period. This condition is therefore not applicable to the reporting period.
54.	The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire. Note: Section 145C of the EPBC Act entitles the approval holder to request an extension to the period of effect of this approval.	Not Applicable	The expiry date of the Revised Approval is 31 December 2069. This condition is therefore not applicable to the reporting period.

6.0 IMPLEMENTATION OF ENVIRONMENTAL MANAGEMENT PLANS

As detailed in Section 5.0 above, there are five (5) EMPs required under the conditions of approval for EPBC 2015/7436, in both the Original and Revised Approval. A summary of the status of the five required EMPs is provided in Table 6—1 below. To date, two of these EMPs have been approved by the Minister, and were implemented during the reporting period, as detailed below.

Table 6—1 Status of Environmental Management Plans required under EPBC Approval 2015/7436

Required Management Plan	Status	Current Requirement
Biodiversity Management Plan – Rev 4.0	Approved	Required prior to commencement of clearing
Water Abstraction Management Plan – Rev 3.4	Approved	Required prior to groundwater extraction
Radiation Protection and Waste Management Plan – Rev 4.0	Submitted, under review	Required prior to commencement of construction
Kerosene Camp Creek Management Plan	In preparation	Required prior to construction of the creek diversion
Acid and Metalliferous Drainage Management Plan	In preparation	Required prior to construction of the creek diversion and waste storages

The commencement of the action and completion of early site works at the Project site in the previous reporting period ‘activated’ the Biodiversity Management Plan (BMP) and Water Abstraction Management Plan (WAMP) - due to the site clearing works and water abstraction from bores undertaken.

As described in Section 3.0, early construction works were completed over an approximate 8-month period from 27 February to mid-October 2023. Limited water abstraction was undertaken during this time, over 3 months from 08 August to 27 October 2023, concurrent with grant of the groundwater extraction licence for the borefield on 08 August 2023.

No further site construction work or water abstraction has been undertaken since mid-October 2023, hence no activities associated with the action were completed during the current reporting period. The Project is awaiting FID to recommence construction activities.

As a result, during the reporting period Arafura focused on carrying out its ongoing environmental monitoring program to collect baseline data – with implementation of the monitoring requirements stipulated within the BMP and WAMP. It is anticipated the extended baseline data will be useful as a comparison point for environmental impact assessment during the construction and operational phases.

The following Table 6—2 details the implementation of the above-mentioned management plans during the reporting period. Commentary is provided regarding implementation and observations from the monitoring.

Table 6—2 Implementation of Environmental Management Plans during the reporting period

Management Plan	Evidence/comments
Water Abstraction Management Plan Rev 3.4	<p>Groundwater monitoring</p> <p>Extensive baseline groundwater monitoring was conducted during the studies to inform the Environmental Impact Statement. Ongoing monitoring has continued since, including during early construction activities to date. Monitoring activities have been undertaken to meet the requirements of the groundwater licensing requirements outlined in L10013 (issued for the borefield on 20 March 2023, and amendment issued on 08 August 2023), L10010 (issued for the mine site on 25 August 2022, and amendment issued on 16 July 2024), and WAMP Rev 3.4. Monitoring will continue throughout both construction and operational phases.</p> <p>The monitoring program includes:</p> <ul style="list-style-type: none"> ▪ Groundwater level ▪ Groundwater quality ▪ Flow meter readings ▪ Climate data. <p>The monitoring program is conducted on a quarterly, bi-annual and annual basis, with data analysed on a regular basis, generally after each collection round. A monitoring report will be provided at the end of the two-year baseline groundwater monitoring program (as specified in WAMP Rev 3.4), which began following the commencement of water abstraction in August 2023. The report will be provided to the Department with the following annual compliance report.</p> <p>Data collection includes:</p> <p>Standard water levels collected manually and with in-situ automatic dataloggers.</p> <p>Water quality collected using in-field measurements and water sampling at relevant groundwater monitoring/ production bores.</p> <p>Field measurements taken include:</p> <ul style="list-style-type: none"> ▪ Temperature ▪ Acidity (pH) ▪ Electrical Conductivity (EC) ▪ Dissolved Oxygen (DO) ▪ Oxidation-Reduction Potential (ORP) ▪ Turbidity ▪ Laboratory analysis taken include: <ul style="list-style-type: none"> ▪ Electrical Conductivity (EC) ▪ Total Dissolved Solids (TDS) ▪ Total Suspended Solids (TSS) ▪ Turbidity ▪ Total Hardness ▪ Total Acidity and Alkalinity ▪ Major ions (CaCO₃, CO₃, HCO₃, Ca, Mg, K, Na, Cl, SO₄, NO₃) ▪ Metal total and dissolved (Al, As, B, Ba, Cd, Co, Cu, Fe, Li, Pb, P, Mn, Hg,

Management Plan	Evidence/comments
	<p>Mo, Ni, Rb, Se, Sr, Ag, U, Th and Zn).</p> <p>Flow meter readings from the production bores, including pastoralist bores to monitor surrounding groundwater use.</p> <p>Climate data obtained from two rain gauges and a main weather station, including but not limited to rainfall, temperature, wind, solar radiation and humidity.</p> <p>Vegetation monitoring</p> <p>Baseline vegetation monitoring was conducted as part of the studies to inform the Environmental Impact Statement, which led to the identification of potential groundwater-dependent ecosystems (GDEs) across the borefield area, and the selection of twelve (12) vegetation monitoring sites for ongoing monitoring throughout the construction and operational phases.</p> <p>An ongoing vegetation monitoring program has been established at each vegetation monitoring site, starting in August 2024. This is in accordance with the monitoring requirements in the WAMP Rev 3.4. The monitoring program includes:</p> <p>Field measurements of vegetation health</p> <p>Remote sensing measurements of vegetation health indices, including NDVI.</p> <p>Measurements to date provide baseline data of vegetation health (including potential GDEs). The ongoing monitoring program will monitor for any potential changes in vegetation health (including potential GDEs) over time and in response to Arafura's water abstraction (once works recommence). The vegetation monitoring program during the reporting period was in development and will continue to be refined, in particular with improvements planned to the remote sensing technology and methodology used.</p>
Biodiversity Management Plan Rev 4.0	<p>Biodiversity monitoring</p> <p>A biodiversity monitoring program began following commencement of the action on 27 February 2023, in accordance with the BMP.</p> <p>The biodiversity monitoring program undertaken during the reporting period represents baseline monitoring, and included targeted monitoring for:</p> <ul style="list-style-type: none"> Great Desert Skink (<i>Liopholis kintorei</i>) (Vulnerable EPBC Act; Vulnerable TPWC Act) Central Australian Rock-wallaby (<i>Petrogale lateralis centralis</i>) (Vulnerable EPBC Act; Near Threatened TPWC Act) Predator species - Cat (<i>Felis catus</i>), Fox (<i>Vulpes vulpes</i>) and Dingo (<i>Canis lupus dingo</i>) <p>Biodiversity monitoring reports (see APPENDIX A) have been prepared for each annual monitoring period (2023-2024; and 2024-2025). Reports include detail of the biodiversity monitoring survey effort, methodology and results over the reporting period (EcOz, 2024), in compliance with the BMP.</p> <p>[REDACTED]</p> <p>Ongoing implementation of control measures</p> <p>Ongoing implementation of mitigation controls was carried out on site during the reporting period in compliance with the requirements of the BMP, as relevant to the scope of works undertaken. These controls included, but were not limited to:</p>



Management Plan	Evidence/comments
	<p>The establishment of 200 m buffer zones around all known Great Desert Skink warrens, within which no clearing or construction works were allowed.</p> <p>Restriction of vehicle speeds when crossing or approaching Great Desert Skink warren buffer zones.</p> <p>Restriction of vehicles to use existing tracks when on site.</p>

7.0 CORRECTING NON-COMPLIANCES

There were no non-compliances during the reporting period.

8.0 ADDRESSING ENVIRONMENTAL INCIDENTS

Two environmental incidents occurred during the reporting period. The remedial actions and further details are provided in Table 8—1 below. Both events were fully addressed with all remedial actions undertaken, and the events closed out by the time of reporting.

These events do not meet the definition of an ‘Incident’ as defined within the Revised Approval, as they do not relate to protected matters. No ‘Events’ occurred during the reporting period as defined within the Revised Approval (including no potential or actual non-compliances with the conditions of approval; or environmental incidents resulting in potential or actual harm to a protected matter).

Table 8—1 Environmental Incidents during the reporting period

Date	Short Description	Work Area	Remedial Actions Taken	Status
24/09/2024	During a routine environmental inspection at the Turkey’s Nest, a deceased reptile was discovered. The relevant Arafura personnel were notified, and an incident report was completed to investigate the cause of death and recommend appropriate control measures. The species was subsequently identified as belonging to the <i>Varanidae</i> (monitor lizard) family.	Turkey’s Nest	Improve the perimeter fencing around the Turkey’s Nest to prevent / deter wildlife from entering. Intensify the regular inspections to ensure the fencing remains in good condition and that no wildlife have passed through or over. Extend current egress matting along the sides of the Turkey’s Nest to allow wildlife to safely climb out if they accidentally fall in.	Closed
15/01/2025	While retrieving a data logger installed at one of the pastoralist monitoring bores, a snake approximately 50 cm in length was found coiled around the data logger’s string. This was a near miss - the snake was not harmed, and was released at the time it was found.	Monitoring bore	Cap all open pastoralist monitoring bores included in the monitoring network. Engage with pastoralists to inform them of the proposed remedial actions, and emphasise the importance of keeping the bores capped to prevent impacts to native fauna.	Closed

9.0 NEW ENVIRONMENTAL RISKS

No new environmental risks not previously considered in the environmental risk assessment of the Project were identified during the reporting period.

10.0 REFERENCES

Title	Document Number
Biodiversity Monitoring 2023-24. Nolans Rare Earths Project. EcOz, 2024.	Ref. 231687-54
Great Desert Skink (<i>Liopholis kintorei</i>) Monitoring 2024-25: Nolans Rare Earths Project, EcOz, 2025.	Ref. 248203-13

11.0 ABBREVIATIONS AND DEFINITIONS

Abbreviation	Meaning
Original Approval	EPBC Approval 2015/7436 granted to Arafura Resources Limited on 11 May 2018
Revised Approval	Variation of EPBC Approval 2015/7436 issued to Arafura on 24 October 2024
Arafura	Arafura Rare Earths Ltd (previously Arafura Resources Limited)
BMP	Biodiversity Management Plan
Department	The Australian Government agency responsible for administering the EPBC Act – DCCEEW at this time
DCCEEW	Department of Climate Change, Energy, the Environment and Water (Commonwealth)
DEPWS	Department of Environment, Parks and Water Security (NT)
EMP	Environmental Management Plan
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Commonwealth)
FID	Final Investment Decision
GDE	Groundwater Dependent Ecosystem
Minister	The Australian Government Minister administering the EPBC Act including any delegate thereof
NT	Northern Territory
NT EPA	Northern Territory Environment Protection Authority
WAMP	Water Abstraction Management Plan

APPENDIX A BIODIVERSITY MONITORING DATA

1. Biodiversity monitoring 2023-24 Nolans Rare Earths Project (EcOz 2024)
2. Great Desert Skink (*Liopholis kintorei*) Monitoring 2024-25: Nolans Rare Earths Project (EcOz 2025)

These documents are for public disclosure due to containing sensitive ecological data. These documents have been provided to the Department.