



Independent Audit Report

Isaac Downs EPBC 2019/8413

10167 Peak Downs Highway, Moranbah, Queensland

Reporting Period: 9 August 2022 – 30 January 2026

Stanmore IP South Pty Ltd

Level 32, 12 Creek Street
Brisbane City QLD 4000 Australia

Prepared by:

SLR Consulting Australia

SLR Project No.: 623.030620.00001

24 March 2026

Revision: 3.0

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
0.1	30 January 2026	Anna Cochrane & Isabelle Farina	Anna Cochrane	Anna Cochrane
1.0	2 February 2026	Anna Cochrane & Isabelle Farina	Sean Wilson	Anna Cochrane
2.0	11 February 2026	Anna Cochrane	Sean Wilson	Anna Cochrane
2.1 Updated draft to address DCCEEW comments	23 March 2026	Anna Cochrane	Anna Cochrane	Anna Cochrane
3.0 Updated to address DCCEEW comments	24 March 2026	Anna Cochrane	Anna Cochrane	Anna Cochrane

Basis of Report

This report has been prepared by SLR Consulting Australia (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Stanmore IP South Pty Ltd (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.



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Appendices

- Appendix A** **EPBC Approval 2019/8413**
- Appendix B** **Audit Scope Criteria & Methodology Statement**
- Appendix C** **DCCEEW Audit Request & Audit Approvals**
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Executive Summary

SLR Consulting Australia (SLR) were engaged Stanmore IP South Pty Ltd (Stanmore) to undertake an Independent Audit (the Audit) for the Isaac Downs Coal Mine (the Project).

This audit has been directed by DCCEEW in correspondence to Stanmore *Direction to conduct Independent Audit – Issac (sic.) Downs Project, near Moranbah, Queensland, EPBC 2019/8413*, dated 1 August 2025, DCCEEW ref: EPBC 2019/8413. Obligations under Condition 30 of the EPBC 2019/8413 approval require Stanmore to commission an audit of compliance against the EPBC approval conditions when requested in writing by the Minister.

This Audit Report assesses compliance for the period 9 August 2022 to 30 January 2026.

SLR undertook a document review in conjunction with a site visit and personnel interviews to determine the project's operational compliance of the project within the auditing period.

Across the 34 primary conditions of the EPBC 2019/8413 Approval, 24 were identified as triggered and therefore identified as assessable for this audit cycle. Seventeen (17; 70.83%) of the assessable conditions of EPBC 2019/8413 were assessed as compliant with the applicable requirements during the audit period, including 3 (12.5%) conditions that were identified as compliant with observation (Conditions 3, 23 and 26). The remaining seven conditions (7, 29.17%) were identified as non-compliant with applicable requirements during the audit period, namely Conditions 1, 4, 11, 17, 25, 28 and 29.

Stanmore's overall score for this audit was 70.83% compliance with assessable, triggered audit criteria. This result indicates Stanmore's commitment to high standards of environmental compliance and performance for the Isaac Downs Coal Mine.

SLR has provided recommendations to address the identified non-compliances. Recommendations have also been provided for Opportunities for Improvement (OFIs) identified during the audit. Improvements identified support Stanmore's ongoing commitment and initiatives to improve compliance management systems and processes for the Project. Implementation of these recommendations will assist Stanmore to further strengthen compliance management systems and processes for the Project.

Stanmore have indicated that they are committed to following up corrective actions to address the identified non-compliant items and opportunities for improvement to further improve the Project's future environmental management and performance. With these actions in place, the Isaac Downs Coal Mine is expected to continue maintaining high standards of environmental management throughout future operations.



Auditor Certification

I, Anna Cochrane,

I certify that, to the best of my knowledge, all information provided in the audit report prepared in accordance with Condition 30 of EPBC Approval 2019/8413 and attached to this audit certification statement is true, correct and complete.

I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both.



Anna Cochrane, BSc GDip SoilSci

Principal Consultant – Environmental Approvals, Closure & Management

Certified Lead Auditor – Environment (C 427136 Exp: 17Mar2026)

DCCEEW Approved Auditor for Isaac Downs EPBC Compliance Audit, 2025

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23 March 2026



1.0 Introduction

1.1 Project Overview

Stanmore IP South Pty Ltd (Stanmore) manages the operation of the Isaac Downs Project (the Project), located approximately 15 km southeast of Moranbah in the Bowen Basin. The physical address of the Project centre Isaac Plains Coal Mine, 10167 Peak Downs Highway, Moranbah, Qld, 4744. EPBC 2019/8413 approval (in Appendix A) was granted for the project on 24 March 2022, with the original permit granted 26 May 2021.

The Project is owned and operated by Stanmore IP South Pty Ltd (Stanmore) and operates under various approvals issued under the Environmental Protection Act 1994 (the EP Act), including Environmental Authority EA0002817, and encompasses activities undertaken on mining leases ML700046, ML700047 and ML700048.

The Project is in Central Queensland, approximately 145 kilometres (km) southwest of Mackay and 10 km south-east of the Moranbah township (Figure 1). The Project forms part of the wider Isaac Plains Coal Complex (Figure 2) and was approved for construction and operation in July 2021. In February 2022 the Dragline was transferred from Isaac Plains East Extension to the Isaac Downs Open Cut operations. Coal from mining operations is processed at the Coal Handling and Preparation Plant (CHPP) which is located within the original Isaac Plains Mining Leases. The Isaac Plains Complex has a remaining life of mine of approximately three years.

The Project was the subject of the Approval which was referred (as the Isaac Plains South Project) under the *EPBC Act* in April 2019. The Referral Decision was issued on 14 May 2019, being Controlled Action Assessment Approach Preliminary Documentation, public notification of the Preliminary Documentation was undertaken on 26 May 2021. The initial Approval (EPBC 2019/8413) was issued to Stanmore IP South Pty Ltd (ABN: 96 625 536 094) on 26 May 2021. The Approved Action is:

“To develop and operate an open cut coal mine and associated infrastructure approximately 10 km south-east of Moranbah, Queensland”



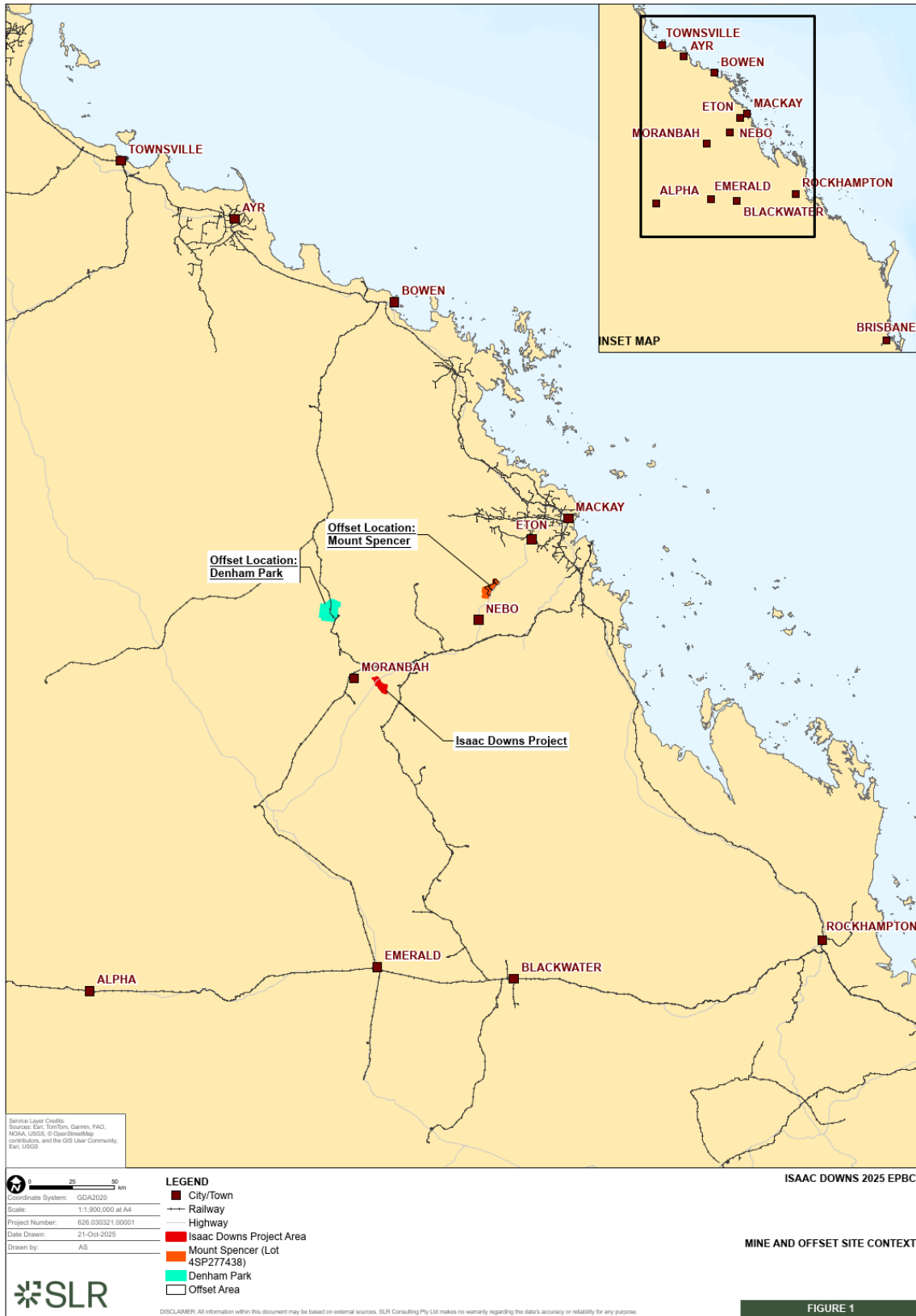


Figure 1: Site Context





Figure 2: Site Setting



For the audit period the responsible department for the Approval was the Department of Climate Change, Energy, the Environment and Water (DCCEEW), referred to as “Department”.

The action subject to the Approval officially commenced on 9 August 2022. This is the first independent environmental audit of the Project EPBC Approval and covers the period of 9 August 2022 to the end of the audit on 30 January 2026.

Specifically, the Approval addresses:

- Clearing of habitat for Koala (*Phascolarctos cinereus*), Greater Glider (*Petauroides volans*), Squatter Pigeon (Southern) (*Geophaps scripta scripta*) (including breeding and foraging habitat) and Ornamental Snake (*Denisonia maculata*); and
- Management and monitoring of Groundwater Dependent Ecosystems.

The approval contains requirements for offsets under the EPBC Act Environmental Offsets Policy (offset policy), including the development of an offset area management plan (OAMP), ornamental snake offset area management plan (OS-OAMP), significant species management plan (SSMP) and a groundwater dependent ecosystem management and monitoring plan (GDEMMP). The management plans outline management and monitoring actions to minimise any impact to Listed threatened species under the *EPBC Act*.

1.1.1 Habitat Impacts and Offset Area

Offset areas are required by the Approval to compensate for the habitat clearing required for the Isaac Downs Project and include impacted habitat for:

- Koala (*Phascolarctos cinereus*) (131.9 ha);
- Greater Glider (*Petauroides volans*) (120.9 ha);
- Squatter Pigeon (Southern) (*Geophaps scripta scripta*) (Breeding habitat - 66.6 ha) (Foraging habitat - 55.5 ha); and
- Ornamental Snake (*Denisonia maculata*) (173.5 ha).

Stanmore had legally secured offset areas within Mt Spencer Station as an offset for residual impacts to Koala habitat, Greater Glider habitat and Squatter Pigeon habitat (breeding habitat and foraging habitat). Although offsets for the Ornamental Snake are required, Mt Spencer Station did not contain habitat to offset these matters. As such, required offsets for the Ornamental Snake are addressed in a separate offset area. The offset areas for the separate Isaac Plains East (IPE) EPBC Approval (2016/7827) and Isaac Plains East Extension (IPEE) EPBC Approval (2019/8548) are located adjacent to the Project offset area (Koala, Greater Glider and Squatter Pigeon) at Mt Spencer. The OAMP was subsequently developed and submitted to the department.

Stanmore had proposed to legally secure the required offset area for the Ornamental Snake habitat on the Denham Park property. Originally, the Ornamental Snake offset was proposed at Nunbank Station, however, the regulatory department raised concerns as to the suitability of the proposed offset location. Following discussions with the department, Stanmore elected to pursue an alternate offset area on Denham Park. The OS-OAMP was subsequently developed and submitted to the department in October 2022 with approval of the plan granted in April 2023. Stanmore requested legal security via voluntary declaration on 12 June 2023 and legally secured the offset on 30 November 2023.



1.2 Audit Reporting Requirement

Obligations under Condition 30 of the EPBC 2019/8413 approval require Stanmore to commission an audit of compliance against the EPBC approval conditions when requested in writing by the Minister.

This is the first Independent Audit of the EPBC approval conducted for the Project, with the scope of works outlined in the following sections designed to align with the DCCEEW's Audit Guidelines and requirements.

Section 1.2 of the Audit Guidelines indicates that, under section 458 of the EPBC Act the Minister or his/her delegate may write to the holder of an EPBC Act approval and require that the approval holder carry out an environmental audit. This can occur when the Minister believes or suspects on reasonable grounds that:

- the approval holder has contravened, or is likely to contravene, a condition of the approval, or
- the impacts on nationally protected matters that the action has, has had or is likely to have, are significantly greater than indicated in the information available to the Minister when the approval was granted.

We further understand that directed environmental audits are generally used when significant or multiple contraventions of conditions that may impact on the matter protected by the approval are suspected.

1.3 Audit Period

The audit period applicable to the assessment of compliance undertaken for this audit is defined as follows:

- Audit period start: 09 August 2022
- Audit period end: 30 January 2026

1.4 Audit Scope, Criteria & Methodology

The scope of the Audit is to assess compliance with the 34 Conditions of the EPBC Approval (EPBC 2019/8413) as is applicable to operations at the Project within the approval boundary.

As per the Minister's request (DCCEEW letter to Stanmore reference EPBC 2019/8413, dated 1 August 2025), the Audit Scope and Audit Criteria must cover project activities and requirements of the conditions of approval during the period from 9 August 2022 to the end of the audit.

The Audit criteria are specified in the approved EPBC Approval EPBC 2019/8413 as follows:

Part A – Conditions specific to the action: Three general conditions apply, covering the following topics:

- Maximum Impact Limits.
- Environmental Offset Requirements.
- Ornamental Snake Offset Area Management Plan (OS-OAMP).
- Offset Implementation Reporting.
- Legal Securing of Environmental Offsets.



- Significant Species Management Plan.
- Conservation of the Koala and Greater Glider in the Bowen Basin.
- Groundwater Dependent Ecosystems (GDEs).

Part B – Standard Administrative Conditions

- Notification of Date of Commencement of the Action.
- Compliance Records.
- Submission and Publication of Plans.
- Annual Compliance Reporting.
- Reporting Non-Compliance.
- Independent Audit.
- Revision of Action Management Plans.
- Completion of the Action.

The Audit Criteria and Methodology applied to conduct this audit is outlined in *Audit Criteria and Methodology Statement, Isaac Downs Project – EPBC Act Referral 2019/8413*, Revision 1.0, 7 October 2025, prepared by SLR and approved by the Department on 10 October 2025, as presented in Appendix B.

1.5 Audit Team

As per DCCEEW’s email to Stanmore dated 9 September 2025 (in Appendix C), SLR auditors Anna Cochrane (Lead Auditor) and Stephen Shoemith (Assistant Auditor) have been accepted by DCCEEW to conduct the audit.

For the Audit, Anna Cochrane led and facilitated the audit including site visit, audit considerations compliance appraisal and preparation of the audit report. As Assistant Auditor, Stephen Shoemith was available to assist the Lead Auditor with review and moderation of audit findings, however this was not required for this audit.

The Auditor was supported by additional specialist project support as follows:

- Helena Howell – Project Director
- Sean Wise - QA/QC Reviewer
- Isabella Farina – Project Support

2.0 Audit Activities

Onsite Audit activities, comprising of site visit, data validation and personnel interviews were undertaken on 9th and 10th of December 2025 by Anna Cochrane and Isabelle Farina of SLR. Further personnel interviews, compliance data validation and report preparation were undertaken remotely between 11th December 2025 and 30th January 2026.

2.1 Audit Participants

Key personnel involved in the audit are provided in Table 1.



Table 1: Audit Participants

Name	Position	Audit Role & Attendance
Anna Cochrane	Lead Auditor (SLR)	Lead the audit program. Convened the audit meetings, interviews, onsite document review, site visit. Lead the audit considerations and reporting. Provided QA/QC review of report documents. Facilitated Audit opening & closing meetings.
Isabelle Farina	Project Support (SLR)	Attended throughout the onsite audit. Assisted with audit interviews, onsite document review and site visit, audit record keeping, audit considerations and reporting. Attended audit opening meeting.
Stephen Shoesmith	Assistant Auditor (SLR)	Available for remote audit assistance (not required for this audit).
Sean Wise	QA/QC (SLR)	Provided QA/QC review of report documents.
Belinda Parfitt	Principal Environment & Community (Stanmore)	Client Key Audit Contact. Attended throughout the onsite audit. Provided environmental data & support. Attended opening & closing meeting.
Jack Jagger	Senior Environmental Advisor (Stanmore)	Attended throughout the onsite audit. Provided environmental data & support. Attended opening meeting.

2.2 Audit Opening and Closing Meetings

An opening meeting was undertaken onsite on 9th December 2025 prior to the onsite component of the audit. The opening meeting provided the opportunity to outline the audit process, methodology and scope, review the schedule and introduce key personnel responsible for environmental management at the Mine.

An audit closing meeting was held on 30 January 2026 via video link, following the site visit to discuss audit findings and recommendations as well as the process for completion and submission of the audit report. The attendees of the meetings are listed in Table 1.

2.3 Site Visit and Interviews

The site component of the audit was undertaken on 9th and 10th December 2025 including site tour to view the site development and operations, and interviews with key Stanmore personnel.

The site tour included the following areas:

- Mine entrance and access road
- Haul roads, access roads and tracks
- Mine infrastructure area (MIA):
 - offices



- equipment and workshop
- storage areas
- Dragline and current pit operations
- Residual void
- In-pit and out-of-pit dump
- Pit protection levee
- Run of Mine (ROM) coal pads
- Dams and water management structures
- Potential future clearing areas
- Rehabilitation areas
- Cultural heritage & community meeting place
- Isaac Riverbank
- Stormwater and surface water drainage arrangements (grass lined swale drains, sedimentation structures, erosion controls)
- Environmental monitoring locations
- Site signage
- Site surroundings
- Surrounding roadways – Isaac Highway

Note - The Project uses existing infrastructure at Isaac Plains Coal Mine (IPCM) for coal processing and raiing, rejects management, power supply and water management.

Information obtained during the interviews conducted, whilst onsite, were directly recorded as evidence. The Audit Team also used the interviews as an opportunity to gain an appreciation of the extent to which the measures in place to manage environmental impacts from operations were understood and implemented.

Photographs taken during the site visit are included in Appendix E.

2.4 Audit Evidence and Document Review

Information was provided by Stanmore prior to, during and following the audit. A large amount of information was made available and/or accessed by the audit team and considered as audit evidence during the audit process, including project approvals, plans, key project documents, monitoring records, reports, correspondence, and other lines of evidence. While this key evidence has been listed in the compliance spreadsheets in Appendix D, it has not been attached to this audit report.

2.5 Compliance Status Descriptions

The terms applied in this Audit Report to describe compliance of the site with the relevant approval documentation are outlined in Table 2, below.



Table 2: Compliance Status Descriptors

Assessment Status	Description
Compliance	A rating of 'compliance' is given when the auditee has complied with a condition or element of a condition.
Non-Compliance	A rating of 'non-compliance' is given when the auditee has not met a condition or an element of a condition.
Not Applicable	A rating of 'not applicable' at the time of the audit is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced or a requirement has not been triggered.
Observation	An 'observation' may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.

3.0 Audit Findings and Recommendations

3.1 Previous Audits

Not relevant to this audit. Given this is the first EPBC Approval audit to be undertaken for the Project, there are no prior audit results for review.

3.1 Current Audit

3.1.1 Compliance Summary

A detailed review of the Project's performance against each of the EPBC 2019/8413 Conditions is presented in the audit compliance tables presented in Appendix D and summarised in Sections 3.1.2 and 3.1.3 below.

3.1.1.1 Overall Compliance with EPBC 2019/8413 Primary Conditions

Across the 34 primary conditions of the EPBC 2019/8413 Approval, 24 were identified as triggered and therefore identified as assessable for this audit cycle. Seventeen (17; 70.83%) of the assessable conditions of EPBC 2019/8413 were assessed as compliant with the applicable requirements during the audit period, including 3 (12.5%) conditions that were identified as compliant with observation (Conditions 3, 23 and 26). The remaining seven conditions (7, 29.17%) were identified as non-compliant with applicable requirements during the audit period, namely Conditions 1, 4, 11, 17, 25, 28 and 29.

Table 3 summarises the overall compliance against EPBC 2019/8413. Figure 3 illustrates the Project's performance against triggered, assessable conditions of EPBC 2019/8413.

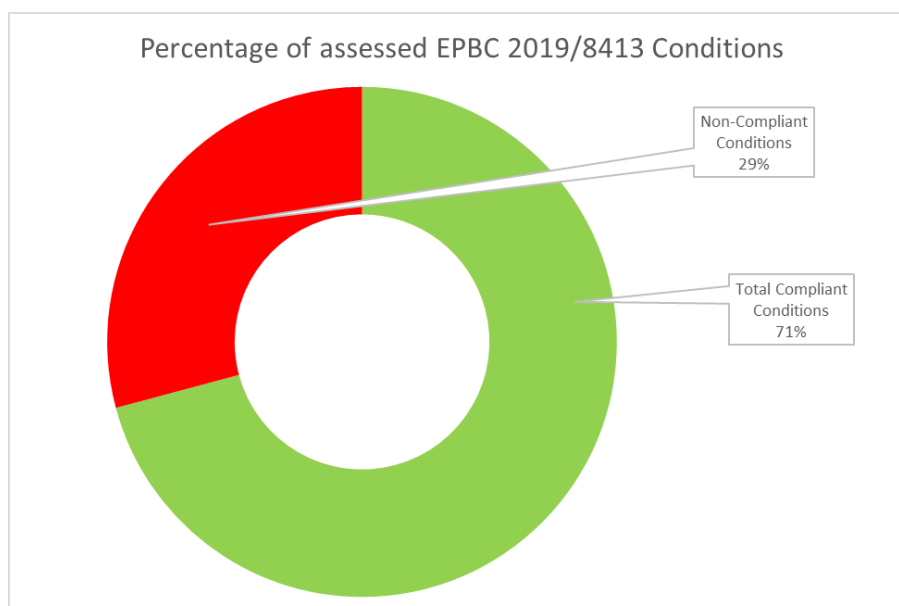
Stanmore's overall score for this audit period was 70.83% compliance with assessable, triggered Conditions of EPBC 2019/8413. This result indicates Stanmore's commitment to high standards of environmental compliance and performance for the Isaac Downs Coal Mine Project. Discussion outlining observations and recommendations for each of the Non-compliances (NC) and Opportunities for Improvement (OFI) identified during the audit process are outlined in Sections 3.1.2 and 3.1.3.



Table 3: Compliance Summary - EPBC 2019/8413 Overall Compliance

Compliance Status	EPBC Approval 2019/8413 Conditions	Total Conditions	Percentage of total Conditions	Percentage of assessed Conditions
Compliant	14	14	41.18%	58.33%
Compliant with observation	3	3	12.50%	12.50%
Total Compliant Conditions	17	17	53.68%	70.83%
Non-Compliant Conditions	7	7	20.59%	29.17%
Not Triggered	10	10	29.41%	n/a
Note only	0	0	0.00%	n/a
Total conditions	34	34	100.00%	n/a
Total assessed conditions (excluding not triggered and notes)	24	24	70.59%	100.00%

Figure 3: Compliance Summary – EPBC 2019/8413 Assessed Conditions



3.1.1.2 Compliance with EPBC 2019/8413 sub-conditions

In addition to assessing the Project’s overall compliance against EPBC 2019/8413 conditions, an assessment against the individual sub-conditions of the approval has been made to provide an additional level of detail illustrating compliance against the individual elements of the Approval.

Within the 34 primary conditions of EPBC 2019/8413, 82 sub-conditions were identified, 58 of which were identified as triggered and therefore assessable for this audit cycle. Forty-seven (47; 81.03%) of the assessable sub-conditions of EPBC 2019/8413 were assessed as



compliant with the applicable requirements during the audit period, including 4 (6.9%) of the that were identified as compliant with observation (Sub-conditions 3, 23, 26 and 26c.). The remaining 11 sub-conditions (18.97%) were identified as non-compliant with applicable requirements during the audit period (Sub-conditions 1, 4, 11, 17, 25a, 25b, 25b)i), 25b)ii), 25d, 28 and 29).

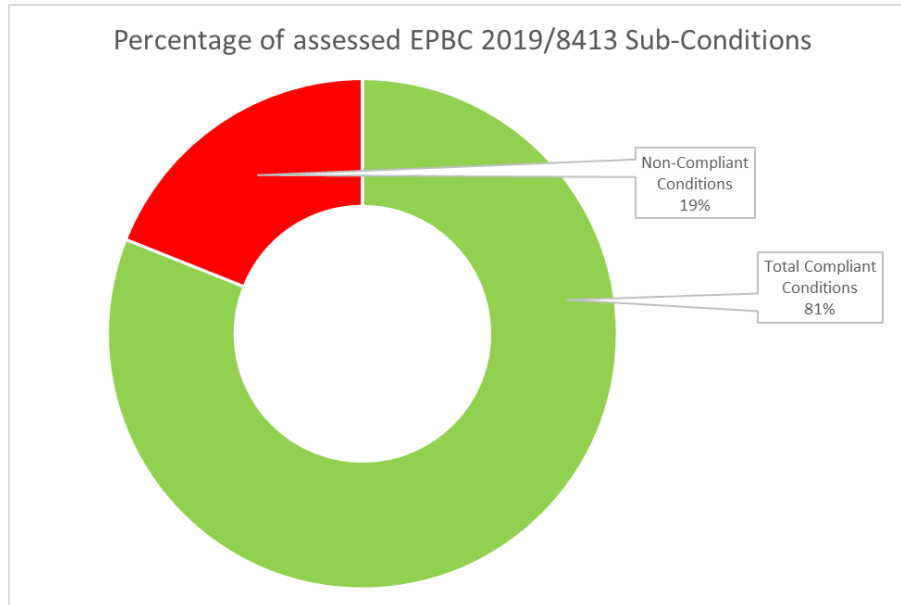
Table 4 summarises the compliance against EPBC 2019/8413 sub-conditions. Figure 4 illustrates the Project’s performance against triggered, assessable sub-conditions of EPBC 2019/8413.

Table 4: Third-Party Audit Compliance Summary

Compliance Status	EPBC Approval 2019/8413 Sub-Conditions	Total Sub-Conditions	Percentage of total Sub-Conditions	Percentage of assessed Sub-Conditions
Compliant Sub-Conditions	43	43	52.44%	74.14%
Sub-Conditions Compliant with observation	4	4	6.90%	6.90%
Total Compliant Sub-Conditions	47	47	59.34%	81.03%
Non-Compliant Sub-Conditions	11	11	13.41%	18.97%
Sub-Conditions Not triggered	22	22	26.83%	n/a
Note only	2	2	2.44%	n/a
Total Sub-Conditions	82	82	100.00%	n/a
Total assessed Sub-Conditions (excluding not triggered and notes)	58	58	70.73%	100.00%



Figure 4: Compliance Summary – EPBC 2019/8413 Sub-Conditions



3.1.2 Non-Compliances

As outlined in the detailed audit findings presented in Appendix D, in determining compliance with the assessable, triggered Audit Criteria, Non-compliances (NC) were identified for seven (7) conditions of EPBC 2019/8413 where required actions or controls had not been fully realised for the development and operation of the Project during the audit period.

The identified non-compliances relate to the following matters:

- **Condition 1: Impact beyond the limits of the project area**
Impacts beyond the EPBC approval boundary were identified in the 2022/2023 Annual Compliance Report, which had not previously been notified to DCCEEW. As outlined in Appendix D, Stanmore notified DCCEEW of the above non-compliances in letter dated 23 November 2023. On 21 March 2024, DCCEEW issued a Warning Letter to Stanmore related to the non-compliance, the content of which also notes that the matter is finalised.

Given the non-compliance occurred during the current Audit Period (9 August 2022 to 30 January 2026), non-compliance with Condition 1 is identified for this Audit. However, the Auditor notes this non-compliance has previously been reported by Stanmore to DCCEEW, and the matter closed by DCCEEW via the formal warning letter issued to Stanmore on 21 March 2024. The Auditor also notes Stanmore has maintained, and continues to maintain compliance with these requirements, and has implemented active monitoring and management measures to ensure ongoing compliance with requirements of the Project's approved impact boundary limits. Therefore, no further action with respect to the identified non-compliance is considered warranted because of this Audit.

- **Condition 4: Ornamental Snake Management Plan (OS-OAMP)**
Non-compliance associated with implementation of the OS-OAMP was noted for the audit period, as follows:



- Written notification of implementation of the OS-OAMP was provided to DCCEEW via email (3 Oct 2023), which was nine (9) days later than the required 6 months of its approval (i.e. before 20 September 2023).
- At the time of the 2024 EPBC Annual Compliance Report, the Year one habitat quality assessment had not been completed. This assessment was subsequently completed on 20 August 2025. In addition, it was observed that land manager reporting had not yet been implemented.
- At the time of the 2025 EPBC Annual Compliance Report, not all elements of the land manager monitoring could be verified as having been implemented due to lack of detail in land manager records, with cattle rotation records limited to 'yes' or 'no'. Specifically, details of cattle grazing numbers and movements were not recorded in monitoring reports.

On 4 November 2025, Stanmore provided a non-compliance notification to DCCEEW via email related to the administrative non-compliance with Condition 4. This notification was provided in alignment with requirements of Conditions 28 and 29.

Given the above, non-compliance with Condition 4 of EPBC 2019/8413 is identified for this Audit Period, with respect to completion of actions required for implementation of the OS-OAMP. Given Stanmore have previously provided non-compliance notification to DCCEEW as outlined above, no further notification is considered necessary for in response to this audit for identified non-compliance against Condition 4.

- **Condition 11: Legal Securing of Environmental Offsets**
Notification of OS-OAMP offsets (Denham Park area) was emailed to DCCEEW on 11 December 2023, which was seven (7) business days following execution of the VMP Declaration (30 November 2023), therefore non-compliance with this condition is identified for the audit period. This administrative non-compliance was reported in the 2024 annual compliance report. According to the 2025 annual compliance report, this non-compliance was communicated to DCCEEW and is considered to have been addressed. Given this alongside the Auditor's observations of Stanmore's implementation of improved compliance management systems (Cority), no further action is considered warranted for this administrative, low-risk non-compliant finding.
- **Condition 17: Revised Groundwater Dependent Ecosystems Management and Monitoring Plan (GDEMMP)**
The Approval was issued on 24 March 2022, therefore the revised GDEMMP was required to be submitted to DCCEEW by 24 September 2024.

A revised GDEMMP was finalised as the Baseline Assessment: Baseline Data Review and Phase 2, GDEMMP, finalised on 18 March 2023. At the time of the audit, no records confirming submission of this report to DCCEEW within the required 2.5 years from issue of EPBC 2019/8413 (i.e. by 24 September 2024) were available for review.

It is noted that a non-compliance against this part of Condition 17 was raised in the 2024 EPBC Annual Compliance Report. The matter was addressed as a "Compliance (qualified)" finding in the 2025 EPBC Annual Compliance Report, on the basis that the previous Non-Compliance had been addressed through subsequent provision of the updated GDEMMP to DCCEEW (via email from Ken Dunlop to DCCEEW, 12 March 2025).



Given the above, non-compliance against this Condition is identified for the Audit period, The Auditor acknowledges that the updated GDEMMP has since been provided to DCCEEW, which addresses the material requirement that an updated GDEMMP be prepared and provided to the Department.

Evidence of GDEMMP implementation within 12 months of submission to DCCEEW is indicated by completion of the November 2024 Monitoring Report for: Event 2, Phase 2 Monitoring. It is noted that at the time of the audit, evidence indicating DCCEEW's approval of the revised GDEMMP was not available for the Auditor's review.

- **Condition 25: Submission and Publication of Plans.**

Non-compliance with sub-conditions 25a, 25b, 25b)i), 25b)ii) & 25d were identified during the audit period related to instances of required management plans being missing or uploaded late to the Stanmore Project website. Matters identified in the 2023 Annual Compliance Report have been formally closed out by DCCEEW in Warning Letter dated 21 March 2024.

Further non-compliance with elements of Condition 25 were identified in the 2024 & 2025 annual compliance reports, and again in December 2025, in each case related to temporary loss of required project plans and reports from the Project website related to corporate website upgrades.

The Auditor notes that non-compliance related to the 2023 Annual reporting period have previously been closed out by DCCEEW via issue of Warning Letter (21 March 2024). It is also noted that DCCEEW have not required further action regarding matters raised / notified in response to the minor administrative matters raised in the 2024 & 2025 annual compliance reports for Condition 25 compliance.

During audit considerations, Stanmore personnel reported that on 15 December 2025, a corporate website upgrade resulted in the Isaac Downs SSMP, GDEMMP and 2025 Annual EPBC environmental compliance report being removed from the website. These reports were reinstated on 24 December 2025 with request the environmental personnel be included as stakeholders in any future updates to the corporate website information to prevent recurrence of data loss. Notification and reporting required by Conditions 28 & 29 has not been provided to DCCEEW has not been provided for this incident to date, however Stanmore personnel indicated this would be undertaken following submission of this audit report, pending consultation with DCCEEW regarding notifications and reporting for administrative matters raised in annual and audit compliance reports, as outlined below.

At the time of this EPBC Compliance Audit, all required plans and reports were available for download from the Project website. Each of the required documents was accessed by the Auditor during the site visit (9 & 10 December 2025), and again during audit compliance verification activities (28 January 2026).

- **Conditions 28 & 29: Reporting Non-compliances**

Non-compliance with Conditions 28 and 29 were identified during the audit period due to notifications and reports of non-compliance being provided to DCCEEW outside the required timeframes. Matters raised in relation to notifications required and not provided by Stanmore within the required two business days following being made aware of non-compliances against Conditions 1, 28 and 29 following issue of



the 2022 and 2023 annual compliance reports.

While it is noted that the actions contributing to non-compliance with Condition 1 occurred before March 2022, and therefore occurred prior to the audit period, subsequent notifications and reporting actions contributing to substantiated non-compliance against Conditions 28 and 29 were undertaken from 7 November, which is within the current Audit Period and therefore are relevant to this Audit.

DCCEEW issued Warning Letters to Stanmore on 14 March 2023 and again on 21 March 2024, for substantiated contravention of Conditions 1, 28 and 29, and closing out compliance matters for these issues.

As recommended at Condition 25, Stanmore are to consult with DCCEEW regarding protocols for provision of separate notification and reporting for administrative non-compliances identified in annual and audit reports. If necessary, Stanmore will formalise notification and reporting to DCCEEW for the administrative non-compliance as outlined at Condition 25 above, following Stanmore's 14 December 2025 website upgrade and temporary removal of required reports from the Project website. In doing so, Stanmore will ensure notification and reporting aligns with requirements of Conditions 28 and 29.

3.1.2.1 Recommendations to address non-compliances

Recommendations to address the identified non-compliances have been made, and are related to:

- Consider improving Denham Park Land Manager Seasonal Checklists to ensure that they include prompts to ensure that all required information is collected and noted in the report, such as provision of applicable details for cattle numbers and movements, for example. It is recommended that this be aligned with the reporting template for the Mount Spencer offset management area.
- Continue implementing compliance management and monitoring processes to ensure timely development and provision of compliance information is undertaken, and that records are retained for review.
- Consult with DCCEEW regarding protocols for provision of separate notification and reporting for administrative non-compliances identified in annual and audit reports. If necessary, formalise notification and reporting to DCCEEW for the administrative non-compliance identified following Stanmore's 14 December 2025 website upgrade and temporary removal of required reports from the Project website.
- Ensure notification and reporting aligns with requirements of Conditions 28 and 29.

Detailed audit findings, including observations and recommendations outlining the identified non-compliances are summarised in Appendix D for Stanmore's consideration as part of its compliance management actions.

3.1.3 Opportunities for Improvement

In determining compliance with the assessable, triggered Audit Criteria, Opportunities for Improvement (OFI) were identified where opportunity to improve and strengthen operational systems or processes was also identified during the audit assessment.

These opportunities for improvement were identified based on the audit team experience, engagement with agencies and audit participants, and observations related to environmental performance. Recommendations for these improvements are related to:



- **Condition 3: Environmental Offset Requirements**

Review of Habitat Management Objectives for each of the EPBC Annual reports for the Audit Period indicates alignment of management actions with the Habitat Management Objectives for each of the reporting years, although notes on fencing, clearing and some other routine management actions were not always indicated in the land manager's notes. It is recommended that Stanmore consider standardising and improving the Offset Area Land Manager reporting for Mt Spencer offset management area, for example via provision of a reporting / notes template that includes prompts for reporting on land management actions and actions taken within the offset area that align with the OAMP habitat management objectives. Consider aligning land manager reporting for both Mt Spencer and Denham Park offset management areas. Include information such as clearing, fence maintenance, native flora and fauna management and habitat improvements, weed and pest maintenance, water management and water infrastructure improvements, land condition, vegetation management and pasture improvements, maintenance of buildings and structures, erosion control, road maintenance, for example.

- **Condition 3 & 4: Offset Management Plan Reporting**

It is noted that some elements of the proposed annual reporting as outlined in Table 19 of the OAMP and Table 18 of the OS-OAMP have not been implemented by Stanmore. For example, Offset Area Reports for either plan have not been appended to the EPBC Annual Compliance Reports completed within the audit period. Further, evidence of an internal audits of OAMP / OS-OAMP implementation as outlined in was not sighted during the audit.

An improvement opportunity is identified for Stanmore to review and improve the OAMP & OS-OAMP reporting schedules to ensure timely completion of reports as required.

- **Condition 23: Compliance Records**

During the Audit it was noted that access to historic records is held across a combination of Stanmore and contracted Coal Mine Operator (CMO) project team records, personal emails, corporate & personal file drives. Discussion with Stanmore personnel acknowledged the difficulties associated with this, for example following changes in personnel or contractor arrangements. Stanmore personnel indicated that Stanmore have implemented an upgraded compliance management system (Cority) which is in use to identify, manage and track compliance management actions and records; and advised that this system is generally being used to attach compliance records to action items.

Stanmore personnel noted further improvements and developments have been identified and are to be implemented over time for the Cority system, including for example, improving Cority performance for managing large file attachments, improving use of Cority as environmental incident register, and further improvements towards capturing and organising compliance records within the database. Stanmore personnel noted that currently only high potential environmental incidents are included in Cority. An onsite incident management system is currently managed by the contractor CMO, however from 15th December 2025, this will be discontinued when the CMO will change from the contractor to Stanmore. From 15th December, the Cority system to take over as the main environmental incident register for the Isaac Downs Project and therefore will become the 'single source of truth' for environmental compliance records, incident and non-conformance reporting. It is recommended that Stanmore continue implementing and improving compliance



and incident management and monitoring processes to ensure timely development and provision of compliance information is undertaken, and that records are retained for review.

- **Condition 26: Submission and Publication of Plans**

While it is noted that they generally align with the required guidelines and Condition 25, it is noted that current ecological and groundwater monitoring reports do not include explicit reference to the current version of Guidelines for biological survey and mapped data (Revised 16 August 2018).

It is recommended that Stanmore update project specifications and scope of works for preparation of monitoring data that is intended to support compliance against EPBC 2019/8413 to include requirements that the monitoring data aligns with Condition 25 of EPBC 2019/8413, specifically that it is prepared so that it:

1. Aligns with and includes reference to the current version of Guidelines for biological survey and mapped data (Revised 16 August 2018); and
2. Is provided electronically in a format that aligns with requirements of the relevant plans and that is suitable for submission to DCCEE.

- **Condition 29.c: Reporting non-compliances**

Majority of actions arising from incident reports have been listed as completed however should follow up on items that are 'still in progress'. Advice from Stanmore

personnel indicating progress towards closing out actions is noted, including budget approvals for signage etc.

It is recommended that Stanmore continue to review and follow up corrective actions arising from non-compliance / incident notifications and ensure that these are closed out in a timely manner.

3.1.4 Conditions Not Triggered for this Audit

Conditions identified as not triggered for this audit are sub-conditions that are not yet applicable to the environmental conditions or stage of the Project operations, as outlined in the detailed audit findings in Appendix D.

Each of these individual plans should be included in future audit cycles once they become applicable to the Project's stage of development.



4.0 Conclusion

Stanmore IP South Pty Ltd (Stanmore) manages the operation of the Isaac Downs Project (the Project), located approximately 15 km southeast of Moranbah in the Bowen Basin. The physical address of the Project centre Isaac Plains Coal Mine, 10167 Peak Downs Highway, Moranbah, Qld, 4744. Approval under section 143 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC 2019/8413) was granted for the project on 24 March 2022, with the original permit granted 26 May 2021.

SLR was commissioned to undertake an independent environmental audit for the Project, to assess and report on the Project's compliance against the conditions of EPBC 2019/8413. The requirement for audit is triggered by Condition 30 of the approval, which requires Stanmore to ensure an independent audit of compliance is undertaken when requested in writing by the Minister. This audit was requested in correspondence to Stanmore dated 1 August 2025, as referenced below.

This is the first audit against the EPBC Approval (EPBC 2019/8413), covering the audit period 9 August 2022 to 30 January 2026. Within the scope of the audit, consideration was given to the environmental performance of activities allowed by the EPBC approval, and their effects on the surrounding environment.

The audit was conducted consistent with requirements of:

- Conditions 30 and 31 of EPBC 2019/8413;
- *Direction to conduct Independent Audit – Issac (sic.) Downs Project, near Moranbah, Queensland, EPBC 2019/8413*, dated 1 August 2025, DCCEEW ref: EPBC 2019/8413;
- *Approval of Audit Criteria and Methodology – Isaac Downs Project, near Moranbah, Queensland, EPBC 2019/8413*, dated 10 October 2025, DCCEEW ref: EPBC 2019/8413; and
- *Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the Environment Protection and Biodiversity Conservation Act 1999*, Department of Environment and Energy, 2019;
- *Audit Criteria and Methodology Statement, Isaac Downs Project – EPBC Act Referral 2019/8413*, Revision 1.0, 7 October 2025, prepared by SLR and approved by the Department on 10 October 2025; and
- Current best practice auditing protocols including AS/NZS ISO 19011:2014 *Guidelines for quality and/or environmental management systems auditing*.

The onsite component of the audit was undertaken on 9 & 10 December 2025, with SLR being supplied additional documentation and information as requested during site interviews, and during Request for Information (RFI) processes both before and following the onsite component of the audit.

During the audit, it was evident that the operation of the Project is being undertaken in a responsible manner generally consistent with the intent of the EPBC 2019/8413 Approval. Identified non-compliances are generally administrative and low risk and/or have previously been addressed by DCCEEW.

Key strengths of Stanmore's environmental management and performance for the Project as noted during conduct of this audit are noted as follows.



- Stanmore site personnel and environmental staff interviewed demonstrate a thorough appreciation of the environmental issues at the facility and appropriate environmental management measures.
- Effective environmental management measures and practices implemented and evidenced during the site inspection.

Across the 34 primary conditions of the EPBC 2019/8413 Approval, 24 were identified as triggered and therefore identified as assessable for this audit cycle. Seventeen (17; 70.83%) of the assessable conditions of EPBC 2019/8413 were assessed as compliant with the applicable requirements during the audit period, including 3 (12.5%) conditions that were identified as compliant with observation (Conditions 3, 23 and 26). The remaining seven conditions (7, 29.17%) were identified as non-compliant with applicable requirements during the audit period, namely Conditions 1, 4, 11, 17, 25, 28 and 29.

Stanmore's overall score for this audit was 70.83% compliance with assessable, triggered audit criteria. This result indicates Stanmore's commitment to high standards of environmental compliance and performance for the Isaac Downs Coal Mine.

SLR has provided recommendations to address the identified non-compliances. Recommendations have also been provided for Opportunities for Improvement (OFIs) identified during the audit. Improvements identified support Stanmore's ongoing commitment and initiatives to improve compliance management systems and processes for the Project. Implementation of these recommendations will assist Stanmore to further strengthen compliance management systems and processes for the Project.

Stanmore have indicated that they are committed to following up corrective actions to address the identified non-compliant items and opportunities for improvement to further improve the Project's future environmental management and performance. With these actions in place, the Isaac Downs Coal Mine is expected to continue maintaining high standards of environmental management throughout future operations.





**Appendix A EPBC Approval
2019/8413**



VARIATION OF CONDITIONS ATTACHED TO APPROVAL Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413)

This decision to vary conditions of approval is made under section 143 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Approved action

Person to whom the approval is granted Stanmore IP South Pty Ltd
ABN: 96 625 536 094

Approved action To develop and operate an open cut coal mine and associated infrastructure approximately 10 km south-east of Moranbah, Queensland.

Variation

Variation of conditions attached to approval The variation is:
Delete Attachment 1 attached to the approval and substitute with the Attachment 1 attached to this notice.

Date of effect This variation has effect on the date the instrument is signed

Person authorised to make decision

Name and position Kim Farrant
Assistant Secretary
Environment Assessments (Vic, Tas) and Post Approvals Branch

Signature

Date of decision 24 March 2022

Date of decision	Part A - Conditions specific to the action
	Maximum Impact Limits
Original dated 26/05/2021	1) The approval holder must not impact beyond the limits of the project area .
Original dated 26/05/2021	2) The approval holder must not impact more than: <ul style="list-style-type: none"> a. 131.9 ha of Koala (<i>Phascolarctos cinereus</i>) habitat; b. 120.9 ha of Greater Glider (<i>Petauroides volans</i>) habitat; c. 66.6 ha of Squatter Pigeon (southern) (<i>Geophaps scripta scripta</i>) breeding habitat; d. 55.5 ha or Squatter Pigeon (southern) (<i>Geophaps scripta scripta</i>) foraging habitat; and e. 173.5 ha of Ornamental Snake (<i>Denisonia maculata</i>) habitat.
	Environmental Offset Requirements
Original dated 26/05/2021	3) To compensate for the impacts to habitat for listed threatened species up to the limits specified in condition 2.a to 2.d, the approval holder must, prior to the commencement of the action and for the duration of the approval, implement the Offset Area Management Plan (OAMP) .
Original dated 26/05/2021	4) To compensate for the impacts to Ornamental Snake (<i>Denisonia maculata</i>) habitat up to the limits specified in condition 2.e, the approval holder must submit an Ornamental Snake Offset Area Management Plan (OS-OAMP), prepared by a suitably qualified ecologist and consistent with the Environmental offsets policy , within 12 months of the date of the commencement of the action for the written approval of the Minister . The approval holder must implement the approved OS-OAMP, and provide written evidence to the department , within 6 months of the approval of the OS-OAMP.
Original dated 26/05/2021	5) The approval holder must not impact more than 120 ha of Ornamental Snake (<i>Denisonia maculata</i>) habitat unless the OS-OAMP has been approved by the Minister in writing.
Original dated 26/05/2021	6) For every hectare of Ornamental Snake (<i>Denisonia maculata</i>) habitat impacted prior to approval of the OS-OAMP (i.e. prior clearance), the approval holder must provide an offset in addition to the offset for the total impact to Ornamental Snake (<i>Denisonia maculata</i>) habitat .
Original dated 26/05/2021	Note: Condition 6 requires the area of habitat to be input into the impact calculator of the Offsets assessments guide to be the total area of habitat impacted plus prior clearance ($\leq 173.5 \text{ ha} + \text{prior clearance}$).
	OS-OAMP
Original dated 26/05/2021	7) The approval holder must ensure the OS-OAMP required under condition 4 includes the following: <ul style="list-style-type: none"> a. details to demonstrate how the offset(s) proposed compensates for the impacts to Ornamental Snake (<i>Denisonia maculata</i>) habitat and any prior clearance in accordance with the

Date of decision	Part A - Conditions specific to the action
	<p>Environmental offsets policy;</p> <ul style="list-style-type: none"> b. a description of the offset(s), including location, size, condition, environmental values present and surrounding land uses; c. relevant baseline data and other supporting evidence, including results from field validation area surveys and quantifiable ecological data, that documents the presence or likely presence of the Ornamental Snake (<i>Denisonia maculata</i>) and the quality of the Ornamental Snake (<i>Denisonia maculata</i>) habitat within the offset area(s); d. an assessment of the site habitat quality score(s); e. details of how the offset area(s) will provide connectivity with other habitats and biodiversity corridors and/or will contribute to a larger strategic offset for the Ornamental Snake (<i>Denisonia maculata</i>); f. a description and maps (including shapefiles) to clearly define the location and boundaries of the offset area(s), accompanied by the offset attributes (including physical address of the offset area(s), coordinates of the boundary points in decimal degrees and the size of the environmental offsets in hectares); g. specific offset completion criteria derived from the site habitat quality score to demonstrate the improvement in the habitat quality score for Ornamental Snake in the offset area(s) over the period of effect of this approval h. details of the management actions (including timing, frequency, duration and method of outcome measurement), to be carried out to meet the offset completion criteria (the management actions proposed must be consistent with the Environmental management plan guidelines and the approved conservation advice); i. interim performance targets that set targets at 5-yearly intervals for expected progress towards the completion criteria set in condition 7.g; j. details of the nature, timing and frequency of monitoring to inform progress against achieving the interim performance targets (the frequency of monitoring must be sufficient to track progress towards each set of milestones, and sufficient to determine whether the offset area(s) is/are likely to achieve those milestones in adequate time to implement all necessary corrective actions); k. timing for the implementation of corrective actions if monitoring activities indicate the interim performance targets have not been achieved; l. a risk analysis and a risk management and mitigation strategy for all risks to the successful implementation of the OS-OAMP and timely achievement of the offset completion criteria, including for if the offset fails to achieve and maintain the completion criteria; and m. the legal mechanism that will be used for legally securing the offset area(s), such that legal security remains in force over the offset area for at least the period of effect of this approval.

Date of decision	Part A - Conditions specific to the action
	Offset implementation Reporting
Original dated 26/05/2021	<p>8) Within 60 business days after the end of each 5 year period from the date of implementation of the OAMP, until the expiry of this approval, the approval holder must submit to the department, and publish on the website for the remainder of the period of the approval, a report that assesses progress towards achieving and maintaining the completion criteria specified in the OAMP and approved OS-OAMP. The report must:</p> <ul style="list-style-type: none"> a. detail performance achieved against all interim performance targets in the period since the date of implementation with more detail in respect of the period since the last report; b. describe the results and effectiveness of all management actions implemented during the period the subject of that report; c. include all monitoring results, including all confirmed sightings of listed threatened species in a format consistent with the Guidelines for biological survey and mapped data; and d. detail any interim performance targets not met and describe all corrective actions taken and evaluate their effectiveness. <p>Once the completion criteria are achieved, they must be maintained by the approval holder for the remainder of the duration of this approval.</p>
Original dated 26/05/2021	<p>9) Within 60 business days of the 20th anniversary of the date of implementation of the OAMP and the OS-OAMP, the approval holder must submit a report that provides evidence substantiating whether the offset area(s) has/have fully achieved and maintained the completion criteria. If all completion criteria have not been achieved within 20 years from the date of implementation of the OAMP and the OS-OAMP, the approval holder must provide, within 6 months, additional environmental offsets approved by the Minister in writing consistent with the Environmental offsets policy.</p>
	Legal Securing of Environmental Offsets
Original dated 26/05/2021	<p>10) The approval holder must legally secure the offset area(s) described in the OAMP and approved OS-OAMP within 12 months of the approval of the associated plan. The OAMP and approved OS-OAMP must be attached to the legal mechanism used to legally secure the associated offset area(s).</p>
Original dated 26/05/2021	<p>11) The approval holder must provide evidence to the department within 5 business days of the legal mechanism being executed.</p>
Original dated 26/05/2021	<p>12) The legal mechanism used to legally secure the offset area(s) described in the OAMP and approved OS-OAMP must remain in force from the date of obtaining legal security and for at least the remaining period of effect of this approval.</p>
	Significant Species Management Plan

Date of decision	Part A - Conditions specific to the action
Original dated 26/05/2021	13) The approval holder must implement the Significant Species Management Plan (SSMP) for the duration of mining activities .
	Conservation of the Koala and Greater Glider in the Bowen Basin
Original dated 26/05/2021	14) The approval holder must contribute a single payment equivalent to the value of \$23,000 (GST exclusive and indexed in line with CPI on the date of this approval) to a program specified by the Minister in writing where the contribution will be used for the better protection and long-term conservation of the Koala (<i>Phascolarctos cinereus</i>) and Greater Glider (<i>Petauroides volans</i>) in the Bowen Basin.
Original dated 26/05/2021	15) Within 3 months of the date the Minister specifies the program described in condition 14, the approval holder must provide notice to the department , with documentary evidence, that the payment required under condition 14 has been made.
	Groundwater Dependent Ecosystems (GDEs)
Original dated 26/05/2021	16) The approval holder must implement the GDE Management and Monitoring Plan for at least the duration of this approval.
Original dated 26/05/2021	17) The approval holder must submit a revised GDE Management and Monitoring Plan (GDEMMP) for the written approval of the Minister within 2.5 years from the date of this approval. The revised GDEMMP must be adjusted to include the raw baseline data and to set the trigger values and disturbance thresholds . The approval holder must implement the revised GDEMMP as approved by the Minister within 12 months of submitting to the Minister .
Original dated 26/05/2021	18) If the approval holder detects that a trigger value has been reached or exceeded, the approval holder must report this to the department within 5 business days of the detection. Unless evidence can be provided, to the Minister's satisfaction, that the trigger value exceedance is not attributable to mining activities , corrective actions must be implemented within 60 business days of the detection.
Original dated 26/05/2021	19) If corrective actions fail to halt or reverse impacts to GDEs within 24 months from the detection of a trigger level being reached or exceeded, and a disturbance threshold has been exceeded, the approval holder must submit a GDE Offset Strategy within 6 months for the written approval of the Minister . The approval holder must implement the approved GDE Offset Strategy within 12 months of submitting to the Minister .
Original dated 26/05/2021	20) Provided no trigger value has been reached or exceeded under condition 18, resulting in the requirement for a GDE Offset Strategy under condition 19, the approval holder must, within 6 months of completing follow-up surveys , submit a report to the Minister that provides: <ul style="list-style-type: none"> a. a summary memorandum detailing the current habitat quality

Date of decision	Part A - Conditions specific to the action
	<p>score of the GDEs;</p> <p>b. a comparison of the follow-up surveys to the baseline GDE dataset provided in the approved revised GDEMMP, to identify any significant departure from the habitat quality score and/or extent of GDEs when compared to these metrics prior to the commencement of the action; and</p> <p>c. commitments to any future monitoring requirements.</p>

	Part B - Standard administrative conditions
	Notification of Date of Commencement of the Action
Original dated 26/05/2021	21) The approval holder must notify the department in writing of the date of commencement of the action within 10 business days after the date of the commencement of the action .
Original dated 26/05/2021	22) If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister .
	Compliance Records
Original dated 26/05/2021	23) The approval holder must maintain accurate and complete compliance records .
Original dated 26/05/2021	24) 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.
Original dated 26/05/2021	Note: Compliance records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act , and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the department's website or through the general media.
	Submission and Publication of Plans
Original dated 26/05/2021	<p>25) The approval holder must:</p> <p>a. submit plans electronically to the department;</p> <p>b. unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of the date of:</p> <p>i. this approval, if the approved version of the plan is specified in these conditions, or</p> <p>ii. the date a plan has been approved by the Minister in writing, if the plan requires the approval of the Minister;</p> <p>c. exclude or redact sensitive ecological data or commercial or personal data from plans published on the website or provided to a member of the public; and</p> <p>d. keep plans published on the website until the end date of this approval.</p>

	Part B - Standard administrative conditions
Original dated 26/05/2021	26) The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under all plans is prepared in accordance with the Guidelines for biological survey and mapped data , or subsequent revision, and submitted electronically to the department in accordance with the requirements of those plans .
	Annual Compliance Reporting
Original dated 26/05/2021	27) The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action , or otherwise in accordance with an annual date that has been agreed to in writing by the Minister . The approval holder must: <ul style="list-style-type: none"> a. publish each compliance report on the website within 60 business days following the relevant 12 month period; b. notify the department by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication; c. keep all compliance reports publicly available on the website until this approval expires; d. exclude or redact sensitive ecological data or commercial or personal data from compliance reports published on the website; and e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the department within 5 business days of publication.
Original dated 26/05/2021	Note: Compliance reports may be published on the department's website.
	Reporting Non-compliance
Original dated 26/05/2021	28) The approval holder must notify the department in writing of any: incident ; non-compliance with the conditions; or non-compliance with the commitments made in plans . The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify: <ul style="list-style-type: none"> a. any condition which is or may be in breach; b. a short description of the incident and/or non-compliance; and c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.
Original dated 26/05/2021	29) The approval holder must provide to the department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:

	Part B - Standard administrative conditions
	<ul style="list-style-type: none"> a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; b. the potential impacts of the incident or non-compliance; and c. the method and timing of any remedial action that will be undertaken by the approval holder.
	Independent Audit
Original dated 26/05/2021	30) The approval holder must ensure that independent audits of compliance with the conditions are conducted when requested in writing by the Minister .
Original dated 26/05/2021	31) For each independent audit , the approval holder must: <ul style="list-style-type: none"> a. provide the name and qualifications of the independent auditor and the draft audit criteria to the department; b. only commence the independent audit once the audit criteria have been approved in writing by the department; and c. submit an audit report to the department within the timeframe specified in the approved audit criteria.
Original dated 26/05/2021	32) The approval holder must publish the audit report on the website within 10 business days of receiving the department's approval of the audit report and keep the audit report published on the website until the end date of this approval.
	Revision of Action Management Plans
Original dated 26/05/2021	33) The approval holder may, at any time, apply to the Minister for a variation to a plan approved by the Minister , or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act . If the Minister approves a revised plan , the approval holder must then, from the date specified, implement the revised plan in place of the previous plan .
	Completion of the Action
Original dated 26/05/2021	34) Within 20 business days after the completion of the action , the approval holder must notify the department in writing and provide completion data .

Date of decision	Part C - Definitions
	In these conditions, except where contrary intention is expressed, the following definitions are used:
Original dated 26/05/2021	Approved conservation advice means the <i>Approved Conservation Advice for Denisonia maculata (Ornamental Snake) (2014)</i> .

Date of decision	Part C - Definitions
Original dated 26/05/2021	Business day means a day that is not a Saturday, a Sunday or a public holiday in the state or territory of the action.
Original dated 26/05/2021	<p>Commencement of the action means the first instance of any specified activity associated with the action including clearing of vegetation and construction of any infrastructure. Commencement of the action does not include minor physical disturbance necessary to:</p> <ul style="list-style-type: none"> i. undertake pre-clearance surveys or monitoring programs; ii. install signage and/or temporary fencing to prevent unapproved use of the project area; iii. protect environmental and property assets from fire, weeds and pests, including erection of temporary fencing and use of existing surface access tracks; or iv. install temporary site facilities for persons undertaking pre-commencement activities so long as these are located where they have no impact on the protected matters.
Original dated 26/05/2021	Completion data means an environmental report and spatial data clearly detailing how the conditions of this approval have been met. The department's preferred spatial data format is shapefile .
Original dated 26/05/2021	Completion of the action means all specified mining activities associated with the action have permanently ceased.
Original dated 26/05/2021	Compliance records means all documentation or other material in whatever form required to demonstrate compliance with the conditions of approval in the approval holder's possession or that are within the approval holder's power to obtain lawfully.
Original dated 26/05/2021	<p>Compliance reports means written reports:</p> <ul style="list-style-type: none"> i. providing accurate and complete details of compliance, incidents, and non-compliance with the conditions and the plans; ii. consistent with the department's <i>Annual Compliance Report Guidelines</i> (2014); iii. include a shapefile of any clearance of any protected matters, or their habitat, undertaken within the relevant 12 month period; and iv. annexing a schedule of all plans prepared and in existence in relation to the conditions during the relevant 12 month period.
Original dated 26/05/2021	Construction means the erection of a building or structure that is or is to be fixed to the ground and wholly or partially fabricated on-site; the alteration, maintenance, repair or demolition of any building or structure;

Date of decision	Part C - Definitions
	preliminary site preparation work which involves breaking of the ground (including pile driving); the laying of pipes and other prefabricated materials in the ground, and any associated excavation work; but excluding the installation of temporary fences and signage.
Original dated 26/05/2021	<p>Corrective action(s) means the measures described in:</p> <ul style="list-style-type: none"> i. the GDEMMP, to be undertaken to halt or reverse impacts to GDEs in the event that trigger values are breached and are a result of mining activities; or ii. the OAMP and OS-OAMP, to be undertaken in offset areas should management measures fail to achieve interim performance targets.
Original dated 26/05/2021	CPI means the Consumer Price Index, sourced from the Australian Bureau of Statistics, based on the change for All Groups CPI over the June to June period (released at the end of June each year).
Original dated 26/05/2021	Department means the Australian Government agency responsible for administering the EPBC act
Original dated 26/05/2021	Disturbance threshold(s) means the ecological trigger thresholds specified in the GDE Management and Monitoring Plan , or, subsequently, in the approved revised GDEMMP when that has superseded the GDE Management and Monitoring Plan , that indicate the requirement(s) for biodiversity offsets in response to impacts to GDEs .
Original dated 26/05/2021	Environmental management plan guidelines means the department's Environmental Management Plan Guidelines (2014), or subsequent revision.
Original dated 26/05/2021	Environmental offsets policy means the EPBC Act Environmental Offsets Policy (2012), or subsequent revision, including the Offset assessment guide .
Original dated 26/05/2021	EPBC Act means the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth).
Original dated 26/05/2021	Follow-up surveys means the GDE surveys, timed to coincide with the driest portion of the year, undertaken at 2, 4 and 6 years after the completion of mining operational activities as described in the GDEMMP .
Original dated 26/05/2021	GDE Management and Monitoring Plan (GDEMMP) means the <i>Groundwater Dependent Ecosystem (GDE) Management and Monitoring Plan</i> (dated 14 April 2021) provided to the department on 16 April 2021, or subsequently varied with the approval of the Minister .

Date of decision	Part C - Definitions
Original dated 26/05/2021	GDE Offset Strategy means a plan consistent with the Environmental Offsets Policy for compensation of impacts to the relevant listed threatened species associated with the GDE .
Original dated 26/05/2021	Greater Glider (<i>Petauroides volans</i>) habitat means all areas of Eucalypt forests or woodlands that contain hollow-bearing trees (e.g. riparian vegetation and dry eucalypt woodland). These include the areas shown shaded green and labelled as 'Habitat' within the project area on the map at Attachment 3.
Original dated 26/05/2021	Groundwater dependent ecosystem(s) (GDE(s)) means the riparian vegetation, coinciding with the alluvial floodplain on the Isaac River, including GDE Area 1 and GDE Area 2, as described in the GDE Management and Monitoring Plan .
Original dated 26/05/2021	Guidelines for biological survey and mapped data means the department's Guidelines for biological survey and mapped data (2018), or subsequent revision.
Original dated 26/05/2021	Habitat quality score is a score on a scale of 0 to 10 representing a site's utility for each listed threatened species , where zero ('0') represents a site of no value to the species, and '10' represents ideal habitat. Unless agreed otherwise by the department , site quality must be composed of 3 points for site condition, 3 points for site context, and 4 points for species stocking rate. These scores must be derived in accordance with the <i>Queensland Guide to determining terrestrial habitat quality: A toolkit for assessing land based offsets under the Queensland Environmental Offsets Policy</i> (Version 1.2, April 2017), or subsequent revision.
Original dated 26/05/2021	Impact(ed) (verb) means to cause any measurable direct disturbance or harmful change as a result of any activity associated with the action. Impact(s) (noun) means any measurable direct disturbance or harmful change as a result of any activity associated with the action.
Original dated 26/05/2021	Incident means any event which has the potential to, or does, impact on one or more protected matters other than as authorised by this approval.
Original dated 26/05/2021	Independent audit: means an audit conducted by an independent and suitably qualified person as detailed in the <i>Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines</i> (2019).
Original dated 26/05/2021	Koala (<i>Phascolarctos cinereus</i>) habitat means any forest or woodland (including remnant, regrowth and modified vegetation communities) containing species that are Koala food trees or any shrubland with emergent Koala food trees. These include the areas shown shaded green and labelled as 'Habitat', and the areas shaded yellow and labelled as

Date of decision	Part C - Definitions
	'Non-remnant Marginal Habitat' within the project area on the map at Attachment 2.
Original dated 26/05/2021	Legal/ly secure/ing/ity means to secure a legal agreement under relevant Queensland legislation, in relation to a site, to provide enduring protection for the site against development incompatible with conservation.
Original dated 26/05/2021	Listed threatened species means the threatened fauna species listed under the EPBC Act for which this approval has effect, being the: <ul style="list-style-type: none"> i. Koala (<i>Phascolarctos cinereus</i>); ii. Greater Glider (<i>Petauroides volans</i>); iii. Squatter Pigeon (southern) (<i>Geophaps scripta scripta</i>); and iv. Ornamental Snake (<i>Denisonia maculata</i>).
Original dated 26/05/2021	Mining activities means all specified activities associated with the action as described in EPBC Act referral 2019/8413, but does not include follow-up surveys and subsequent requirements.
Original dated 26/05/2021	Mining operational activities means specified activities associated with the action in relation to removal of overburden and extraction of coal, as described in EPBC Act referral 2019/8413, but excluding activities occurring after the permanent cessation of operational activities such as rehabilitation and decommissioning.
Original dated 26/05/2021	Monitoring data means the data required to be recorded under the conditions of this approval.
Original dated 26/05/2021	Minister means the Australian Government Minister administering the EPBC Act including any delegate thereof.
Original dated 26/05/2021	Offset Area Management Plan (OAMP) means the <i>Isaac Downs-Offset Area Management Plan</i> (dated 9 April 2021), provided to the department on 9 April 2021, or subsequently varied with the approval of the Minister .
Original dated 26/05/2021	Offset assessment guide means the guidance document titled <i>How to use the Offsets assessment guide</i> (2012), which includes the requirements for habitat quality scores , provided by the department to assist users of the Environmental offsets policy .
Original dated 26/05/2021	Ornamental Snake (<i>Denisonia maculata</i>) habitat means gilgai mounds and depressions with cracking- clay soils and moist areas (particularly within, or close to, habitat that is known to be favoured by its prey [frogs]) with microhabitat features (i.e. logs, woody debris and leaf litter), and Brigalow threatened ecological community. It is shown marked within the project area on the map at Attachment 5 as 'Gilgai in Remnant Vegetation' and 'Gilgai in Cleared Paddocks'.

Date of decision	Part C - Definitions
Original dated 26/05/2021	Plan(s) means any of the documents required to be prepared, approved by the Minister , implemented by the approval holder and/or published on the website in accordance with these conditions (includes action management plans and/or strategies).
Original dated 26/05/2021	Prior clearance means the total area (in hectares) of Ornamental Snake (<i>Denisonia maculata</i>) habitat impacted prior to approval of the OS-OAMP.
Original dated 26/05/2021	Project area means the footprint within which the action will be undertaken, shown shaded beige and labelled as 'Project Footprint' on the map at <u>Attachment 1</u> .
Original dated 26/05/2021	Protected matter(s) means a matter protected under a controlling provision in Part 3 of the EPBC Act for which this approval has effect.
Original dated 26/05/2021	Raw baseline data means the baseline biotic and abiotic data collected in the initial 2 years from the commencement of the action that will be used to define suitable trigger values for the detection of impacts on GDEs as specified in the GDE Management and Monitoring Plan .
Original dated 26/05/2021	Sensitive ecological data means data as defined in the Australian Government Department of the Environment (2016) <i>Sensitive Ecological Data -Access and Management Policy V1.0</i> .
Original dated 26/05/2021	Shapefile means location and attribute information of the action provided in an Esri shapefile format. Shapefiles must contain '.shp', '.shx', '.dbf' files and a '.prj' file that specifies the projection/geographic coordinate system used. Shapefiles must also include an '.xml' metadata file that describes the shapefile for discovery and identification purposes.
Original dated 26/05/2021	Significant Species Management Plan (SSMP) means the <i>Isaac Downs- MNES Significant Species Management Plan</i> (dated 13 April 2021) provided to the department on 16 April 2021, or a subsequent version currently approved by the Minister in writing.
Original dated 26/05/2021	Squatter Pigeon (southern) (<i>Geophaps scripta scripta</i>) breeding habitat means any remnant or regrowth open-forest to sparse, open-woodland or scrub dominated by <i>Eucalyptus</i> , <i>Corymbia</i> , <i>Acacia</i> or <i>Callitris</i> species, on sandy or gravelly soils (including, but not limited to, areas mapped as Queensland land zones 3, 5 or 7) and where groundcover vegetation is less than 33% of the ground area, within 1 km of a suitable, permanent or seasonal waterbody. These include the areas shown shaded dark green and labelled as 'Breeding and Foraging Habitat' within the project area on the map at Attachment 4.
Original dated 26/05/2021	Squatter Pigeon (southern) (<i>Geophaps scripta scripta</i>) foraging habitat means any remnant or regrowth open-forest to sparse, open-woodland or scrub dominated by <i>Eucalyptus</i> , <i>Corymbia</i> , <i>Acacia</i> or

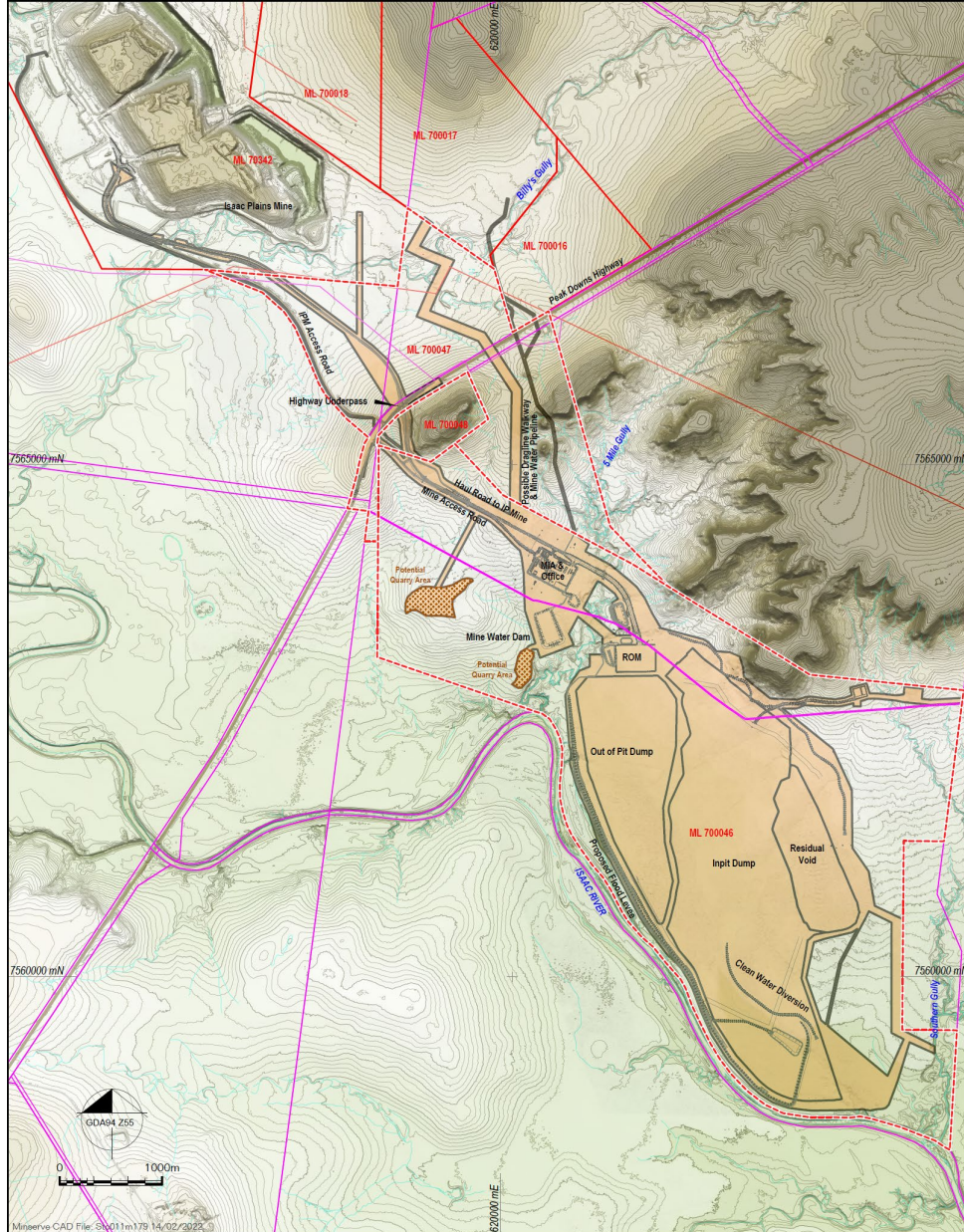
Date of decision	Part C - Definitions
	<p><i>Callitris</i> species, on sandy or gravelly soils (including, but not limited to, areas mapped as Queensland land zones 3, 5 or 7) and where groundcover vegetation is less than 33% of the ground area, within 3 km of a suitable, permanent or seasonal waterbody. These include the areas shown shaded light green and labelled as 'Foraging' within the project area on the map at Attachment 4.</p>
Original dated 26/05/2021	<p>Suitably qualified ecologist: means a person who has professional qualifications and at least three (3) years of work experience managing or studying and preparing prescriptions for the management of Ornamental Snake (<i>Denisonia maculata</i>), and can give an authoritative assessment and advice on the management requirements of Ornamental Snake (<i>Denisonia maculata</i>) using relevant protocols, standards, methods and/or literature.</p>
Original dated 26/05/2021	<p>Suitably qualified person means a person who has professional qualifications, training, skills and/or experience related to the nominated subject matter and can give authoritative independent assessment, advice and analysis on performance relative to the subject matter using the relevant protocols, standards, methods and/or literature.</p>
Original dated 26/05/2021	<p>Trigger value(s) means the ecological thresholds specified in the GDE Management and Monitoring Plan or subsequently in the approved revised GDEMMP when that has superseded the GDE Management and Monitoring Plan which, if reached or exceeded, require the approval holder to undertake investigation and/or corrective action to prevent impacts to GDEs.</p>
Original dated 26/05/2021	<p>Website means a set of related web pages located under a single domain name attributed to the approval holder and available to the public.</p>

Date of decision

Attachments

As varied on the date this instrument was signed

Attachment 1: Project Area



LEGEND

- ML
- Isaac Downs Project MLs
- Project Footprint
- ~ Drainage
- Roads - Major
- Cadastral Boundary
- Topography 1m Contours

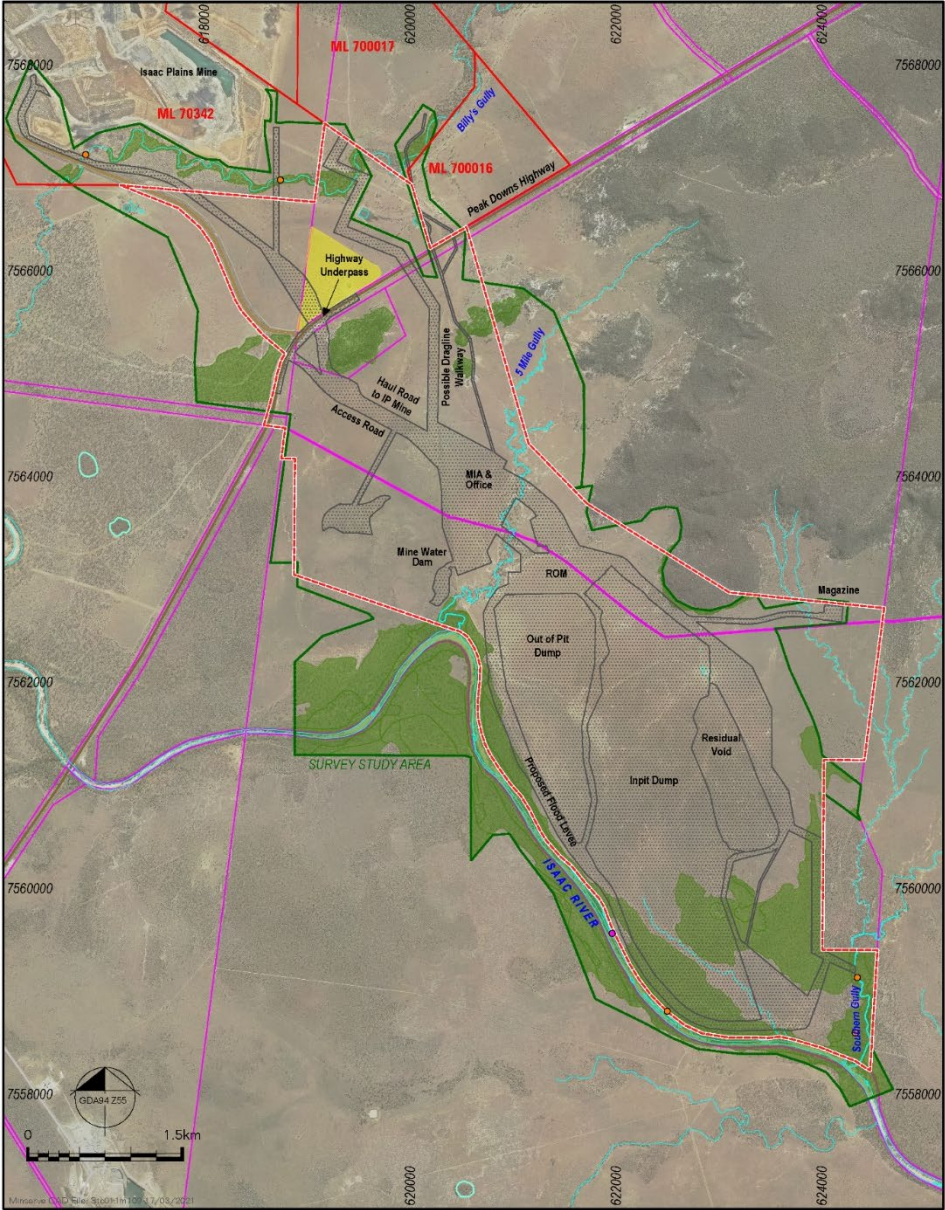
ISAAC DOWNS PROJECT
stanmore
IP South

Revised Attachment 1
Project Area

Date of decision	Attachments
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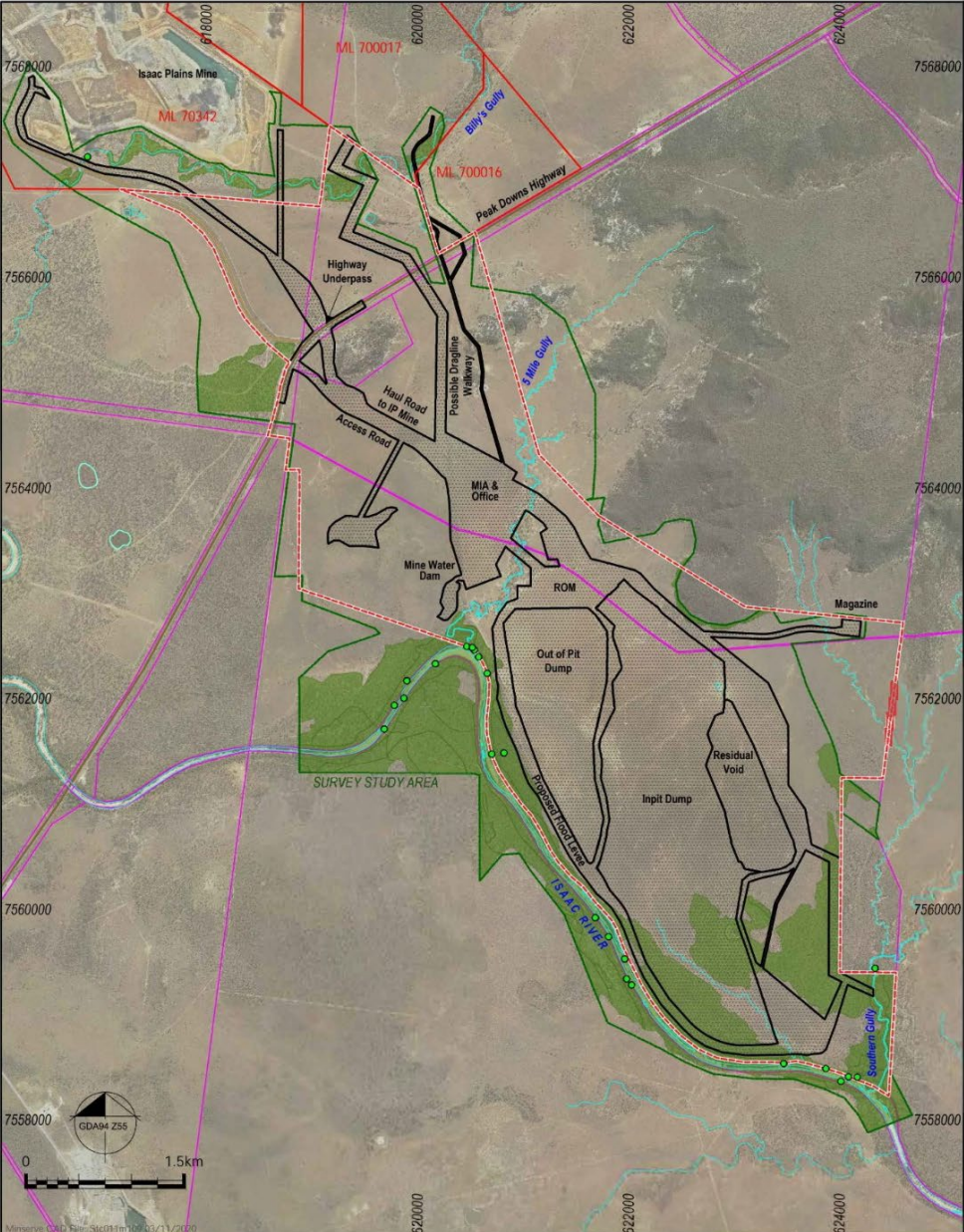



























Original dated 26/05/2021

Attachment 2: Koala (*Phascolarctos cinereus*) habitat



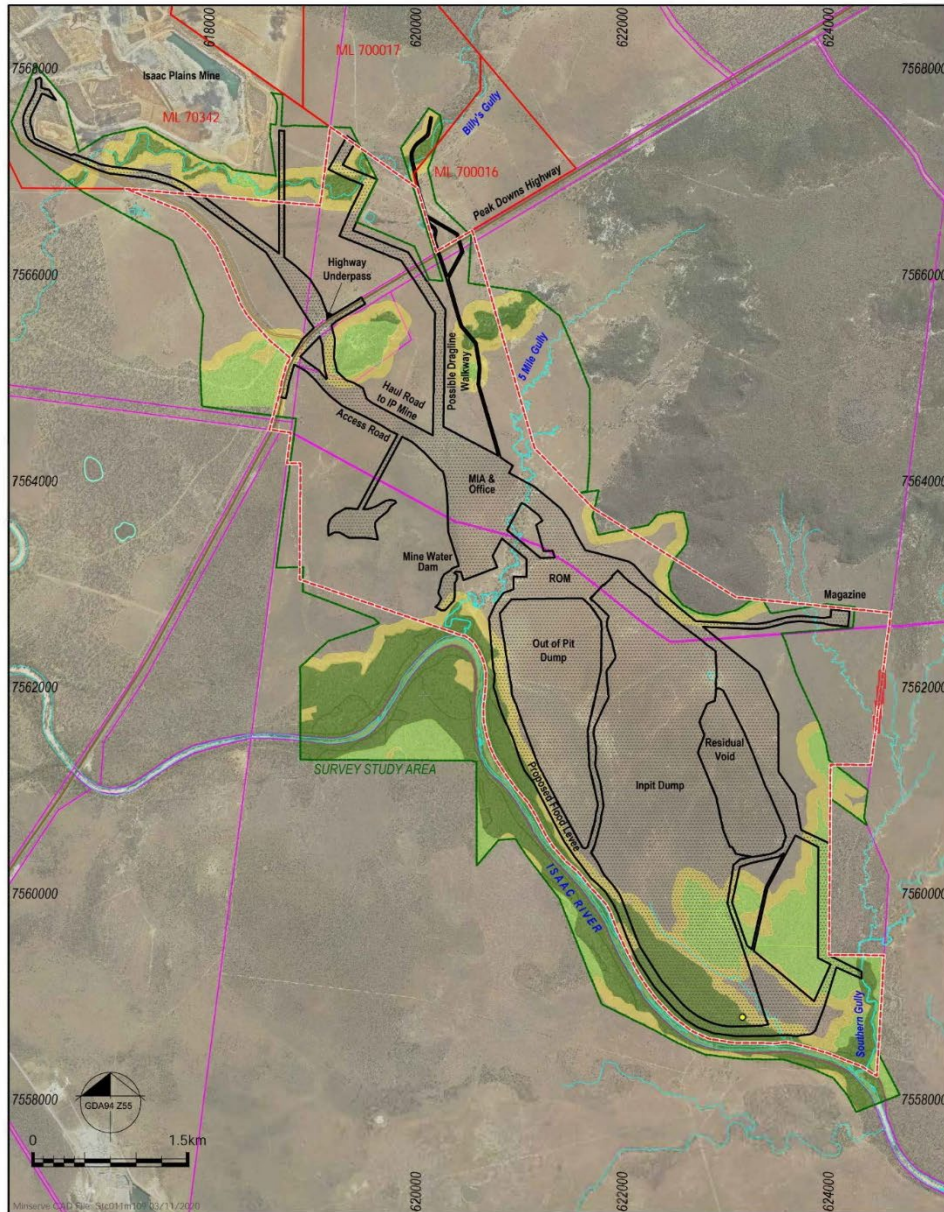
- LEGEND**
- | | |
|--------------------------|---------------------------------|
| ML | Koala Habitat |
| Isaac Downs Project MLAs | Non-remnant Marginal Habitat |
| Drainage | Recorded Locations : Individual |
| Roads - Major | Scat and scratch marks |
| Cadastral Boundary | |
| Ecology Study Area | |
| Disturbance Area | |

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Koala Habitat

Date of decision	Attachments														
Original dated 26/05/2021	<p data-bbox="359 241 1125 280">Attachment 3: Greater Glider (Petauroides volans) habitat</p>  <p data-bbox="375 1534 486 1556">LEGEND</p> <table border="0" data-bbox="375 1556 774 1680"> <tr> <td> ML</td> <td> Greater Glider Habitat</td> </tr> <tr> <td> Isaac Downs Project MLAs</td> <td> Recorded Locations</td> </tr> <tr> <td> Drainage</td> <td></td> </tr> <tr> <td> Roads - Major</td> <td></td> </tr> <tr> <td> Cadastral Boundary</td> <td></td> </tr> <tr> <td> Ecology Study Area</td> <td></td> </tr> <tr> <td> Disturbance Area</td> <td></td> </tr> </table> <p data-bbox="1085 1534 1324 1624">ISAAC DOWNS PROJECT stanmore IP South</p> <p data-bbox="1085 1601 1324 1624">Greater Glider Habitat</p>	 ML	 Greater Glider Habitat	 Isaac Downs Project MLAs	 Recorded Locations	 Drainage		 Roads - Major		 Cadastral Boundary		 Ecology Study Area		 Disturbance Area	
 ML	 Greater Glider Habitat														
 Isaac Downs Project MLAs	 Recorded Locations														
 Drainage															
 Roads - Major															
 Cadastral Boundary															
 Ecology Study Area															
 Disturbance Area															

Original dated 26/05/2021

Attachment 4: Squatter Pigeon (southern) (*Geophaps scripta scripta*) habitat



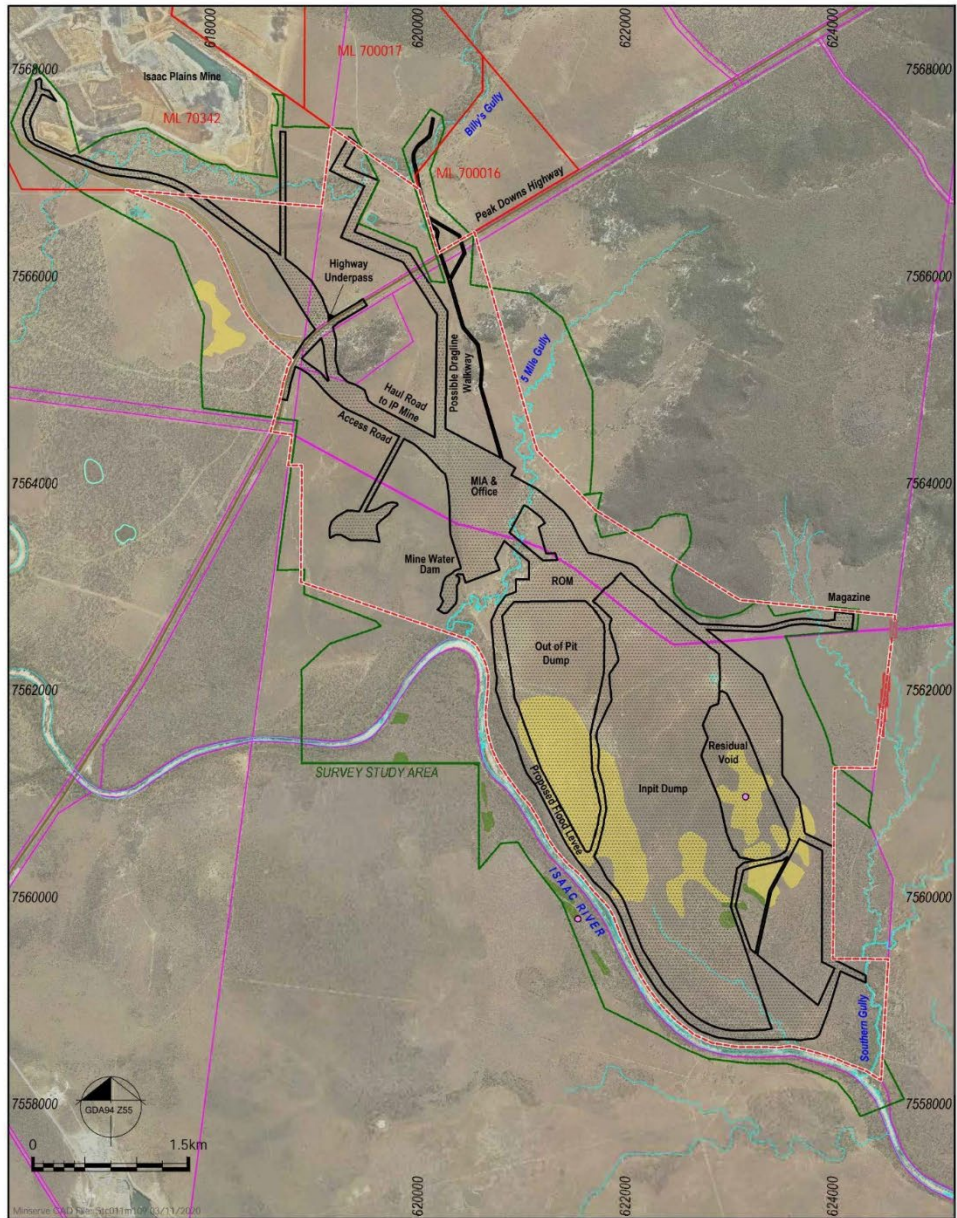
LEGEND

ML	Squatter Pigeon Breeding and Foraging Habitat
Isaac Downs Project MLAs	Foraging
Drainage	Dispersal
Roads - Major	Recorded Locations
Cadastral Boundary	
Ecology Study Area	
Disturbance Area	

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 Squatter Pigeon Habitat

Original dated 26/05/2021

Attachment 5: Ornamental Snake habitat



LEGEND

- | | |
|--------------------------|----------------------------|
| ML | Ornamental Snake |
| Isaac Downs Project MLAs | Gilgai in Cleared Paddocks |
| Drainage | Recorded Locations |
| Roads - Major | |
| Cadastral Boundary | |
| Ecology Study Area | |
| Disturbance Area | |

ISAAC DOWNS PROJECT
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 IP South
 Ornamental Snake Habitat



Appendix B Audit Scope Criteria & Methodology Statement



Audit Criteria and Methodology Statement

**Isaac Downs Project – EPBC Act Referral 2019/8413
Independent Audit 2025**

Stanmore IP South Pty Ltd

Level 15, 133 Mary Street, Brisbane QLD 4000

Prepared by:

SLR Consulting Australia Pty Ltd

Level 1, 382 Sturt Street, Townsville QLD 4810

SLR Project No.: 623.030235.00001

7 October 2025

Revision: 1.0

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1.0	7 October 2025	Alisha Dabonde	Sean Wilson / Stephen Shoesmith / Anna Cochrane	Anna Cochrane
	Click to enter a date.			
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	Click to enter a date.			

Basis of Report

This report has been prepared by SLR Consulting Australia Pty Ltd (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Stanmore IP South Pty Ltd (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.



Executive Summary

An audit of compliance with environmental approval matters to be undertaken for the Isaac Downs Project, near Moranbah, Queensland. A summary of the audit particulars is provided below.

Client	
Audit Location	Isaac Plains Coal Management, Peak Downs Hwy, Moranbah QLD 4744
Audit Period	9 August 2022 to end of the audit (date to be confirmed)
Type of Audit	EPBC Audit
Audit Trigger	As directed by Department of Climate Change, Energy and the Environment (DCCEEW) in: <ul style="list-style-type: none"> • <i>Direction to conduct Independent Audit – Issac (sic.) Downs Project, near Moranbah, Queensland, EPBC 2019/8413</i>, letter from DCCEEW to Stanmore, dated 1 August 2025, DCCEEW ref: EPBC 2019/8413.
Scope of Audit	Conduct an independent audit to review compliance with Commonwealth Conditions in EPBC 2019/8413
DECCEW Approved Auditors	Anna Cochrane & Stephen Shoesmith
Audit Support Team	SLR Consulting Australia Pty Ltd <ul style="list-style-type: none"> • Helena Howell – QA/QC Review • Isabella Farina – Project Support
Approval Holder Representative	Stanmore IP South Pty Ltd <ul style="list-style-type: none"> • Belinda Parfitt – Principal Environment & Community, Isaac Plains Complex



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Appendix A	Audit Criteria and Methodology Template
Appendix B	Audit Team



1.0 Introduction

SLR were engaged by Stanmore IP South Pty Ltd (Stanmore), to undertake the 2025 independent audit of compliance against EPBC 2019/8413 approval conditions for Isaac Downs Project (the Project) as directed by the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

This audit has been directed by DCCEEW in correspondence to Stanmore *Direction to conduct Independent Audit – Issac (sic.) Downs Project, near Moranbah, Queensland, EPBC 2019/8413*, dated 1 August 2025, DCCEEW ref: EPBC 2019/8413. Obligations under Condition 30 of the EPBC 2019/8413 approval require Stanmore to commission an audit of compliance against the EPBC approval conditions when requested in writing by the Minister.

This Audit Criteria and Methodology Statement supports the Commonwealth Conditions of Approval (EPBC 2019/8413) and aligns with:

- *Direction to conduct Independent Audit – Issac (sic.) Downs Project, near Moranbah, Queensland, EPBC 2019/8413*, letter from DCCEEW to Stanmore, dated 1 August 2025, DCCEEW ref: EPBC 2019/8413.
- *Independent Audit and Audit Report Guidelines - for controlled actions which have been approved under Chapter 4 of the Environment Protection and Biodiversity Conservation Act 1999*, Department of the Environment and Energy, Australian Government, 2019 ('the Audit Guidelines').
- *RE: EPBC 2019/8413 - Isaac Downs Project near Moranbah, QLD - Direction to conduct an independent audit*, email from DCCEEW (per Keith Horwood) to Stanmore (per Belinda Parfitt), dated 2 September 2025.

The Isaac Downs Project (the Project) is located in the Northern Queensland, approximately 15km southeast of Moranbah in the Bowen Basin. The mine is part of the Isaac Plains Complex, extracting approximately 3.2 million tonnes (Mt/year) metallurgical coal per year.

The Project is owned and operated by Stanmore IP South Pty Ltd (Stanmore) and operates under various approvals issued under the Environmental Protection Act 1994 (the EP Act), including Environmental Authority EA0002817, and encompasses activities undertaken on mining leases ML700046, ML700047 and ML700048.

1.1 Audit Purpose & Objectives

The purpose of this Audit is to assess compliance with the Project's EPBC approval (EPBC 2019/8413) to confirm that:

1. Conditions of the EPBC approval are being complied with.
2. Assess any impacts on nationally protected matters, including an appraisal of whether these impacts has, has had or is likely to have significantly greater than indicated in the information available to the Minister when the approval was granted.

Audit Objectives align with conditions of the EPBC approval, DCCEEW directions related to conduct of this audit and include:

- Undertake an independent audit as required by the EPBC approval conditions and DCCEEW directions.
- Assess the environmental compliance of the Project against the EPBC approval conditions including any relevant compliance documents prepared to satisfy the compliance under the EPBC approval.



- Provide recommendations to address any identified non-compliance with EPBC approval requirements and details of future audits for any conditions that are not activated.

1.2 Audit Scope

The scope of the Audit is to assess compliance with the Conditions of the EPBC approval (EPBC 2019/8413) as is applicable to operations at the Project within the approval boundary.

The Audit Scope and Audit Criteria must cover project activities and requirements of the conditions of approval during the period from 9 August 2024 to the end of the audit (date to be confirmed pending DCCEEW advice).

1.3 Audit Criteria

The Audit criteria are specified in EPBC approval EPBC 2019/8413 as follows:

Part A – Conditions specific to the action. Three general conditions apply, covering the following topics:

- Maximum Impact Limits.
- Environmental Offset Requirements.
- Ornamental Snake Offset Area Management Plan (OS-OAMP).
- Offset Implementation Reporting.
- Legal Securing of Environmental Offsets.
- Significant Species Management Plan.
- Conservation of the Koala and Greater Glider in the Bowen Basin.
- Groundwater Dependent Ecosystems (GDEs).

Part B – Standard Administrative Conditions

- Notification of Date of Commencement of the Action.
- Compliance Records.
- Submission and Publication of Plans.
- Annual Compliance Reporting.
- Reporting Non-Compliance.
- Independent Audit.
- Revision of Action Management Plans.
- Completion of the Action.

1.4 Audit Team

The audit team comprises two (2) DCCEEW Approved Auditors, to be supported by specialist audit project and QA/QC support as follows:

DCCEEW Approved Auditors:

- Anna Cochrane – Lead Auditor & Project Manager
- Stephen Shoemith – Assistant Auditor



Additional Audit Project Support:

- Helena Howell – Project Director & QA/QC Reviewer
- Isabella Farina – Project Support

All Audit Team members are SLR employees experienced in undertaking environmental compliance reviews and audits, and who are independent of any potential conflicts of interest with the audit to be undertaken. A summary of the audit team's experience is provided as Appendix B.

2.0 Audit Methodology

To achieve audit objectives, the following methodology is proposed:

- Undertake the audit using current auditing best practice and protocols, including the Audit Guidelines issued by the DCCEE and AS/NZS ISO 19011:2019 *Guidelines for quality and/or environmental management systems auditing*.
- Undertake the audit utilising a suitably qualified, experienced and independent auditors accepted by DCCEE, supported where necessary by additional suitably qualified and experienced technical experts who meet the minimum requirements of AS/NZS ISO 19011:2019 *Guidelines for quality and/or environmental management systems auditing*.
- Desktop audit.
- Site verification and Interviews with key personnel.
- Site walkover by audit team.
- Assessment of compliance against the EPBC approval criteria, including an assessment of whether project impacts are in alignment with expected impacts for the audit period.
- Assessment of compliance status of the project operations against the EPBC approval conditions and associated management plans for operations carried out during the audit period.
- Audit report including a detailed evaluation of performance, summary of performance, recommendations to address any identified non-compliances, and suggestions for continuous improvement.
- Audit scoring to indicate compliance status for the respective criterion to be audited.
- The audit report will be subject to SLR's quality control and technical assurance to ensure reliability and accuracy.

3.0 Scope of Works

The scope of work outlined below is similar to staging used on other independent compliance audits successfully undertaken by SLR (Figure 1).





Figure 1 – Audit Stages

3.1 Task 1 - Audit Planning and Engagement

3.1.1 Task 1a – Early Engagement, Planning & Liaison

SLR will facilitate a commencement meeting with Stanmore’s Team to confirm the audit program, methodology and requirements.

It is proposed that Stanmore provides a high-level summary of key systems used to manage EPBC approval compliance and performance, an overview of any known environmental impacts associated with the Project operations, and a description of key activities that have been undertaken during the audit period towards compliance with EPBC approval conditions.

SLR will also undertake consultation with regulators (if required), project initiation and management activities, including project and data systems establishment, site visit arrangements, completion of required inductions, WHS assessments and other associated tasks.

3.1.2 Task 1b - Document Review

The auditor will review the applicable EPBC approval, associated project approvals, reports and other accessible information to help gain a high-level understanding of the current compliance with relevant requirements and status of any previous environmental action items before the site inspection component of the audit begins.

Prior to commencement of the audit, Stanmore will be requested to upload required audit information, including background information, references, and audit evidence into a file share location to be set up by SLR. The file share system will be organised against key sections and criteria of the EPBC approval to streamline the collation and review of audit information and speed up the audit process.

3.1.3 Task 1c - Audit Protocols and RFI

A comprehensive and customised set of Audit Protocols will be prepared for the audit. The Protocols will address the specific requirements of the EPBC approval, and any other applicable requirements relevant to the scope and criteria for the audit. The protocols will also consider information requirements to be provided in the Audit Report, the Audit Guideline requirements, any agency/stakeholder consultation requirements or consultation



feedback, and any other compliance or regulatory review results that may be applicable to the audit scope and criteria. Specifically, it will audit compliance with the following:

- Conditions of the EPBC 2019/8413 approval.

In preparing the Audit Protocols, considerations will also be given to any specific requirements of the following that may also apply, as applicable to activities under the EPBC approval:

- Environmental Authority EA0002817.
- Mining leases ML700046, ML700047 and ML700048.

The Audit Protocols will list the criteria that will be audited against during the audit and will be annotated to function as a Request for Information (RFI) to assist Stanmore with the identification of applicable audit evidence to be collated. Audit Protocols will be provided to Stanmore prior to the commencement of the audit activities to facilitate proactive evidence collation.

It is suggested that document/information that would provide evidence of implementation for each item with the Audit Protocol be collated into individual folders (electronic or hard copy) for every condition/requirement. To facilitate information sharing during the audit, SLR will provide a OneDrive ShareFile link for Stanmore's use.

3.1.4 Task 1d – Audit Plan

Prior to the onsite component of the audit, an Audit Plan will be prepared, in consultation with Stanmore, to confirm the scope, criteria, objectives, audit process, indicative itinerary and personnel and other resources required for successful completion of the audit activities. A draft Audit Plan will be circulated to Stanmore for one (1) round of input prior to it being finalised by SLR.

3.2 Task 2 – Auditing and Compliance Evaluation

3.2.1 Task 2a – Auditing Activities

Compliance and performance against the relevant requirements will be verified through site inspection, document reviews, onsite investigations and supplementary remote auditing as required. While onsite, the Audit Team will review the implementation and effectiveness of compliance management activities and the level of conformance of these activities with relevant requirements. The verification will involve a physical walk through of the project activity areas, interviews with the leadership team, and checking documented evidence relevant to the EPBC approval conditions.

An Audit Opening Meeting will be convened onsite (and via Microsoft Teams if required) to provide for introductions to relevant site personnel and review the Audit Plan and proposed onsite activities.

Following the opening meeting, site walkover of the activity areas of the project will be conducted by the Audit Team. Stanmore will provide a site representative who is knowledgeable of the project activities, EPBC approval and associated compliance activities to accompany the site walkover, and onsite transportation as may be required. Where applicable, photographs will be taken to record the various aspects of the project's environmental conditions and operations.

Onsite audit activities will also include onsite data collection and validation and interviews with relevant site personnel throughout the duration of the onsite component of the audit, to assist in the identification of information relevant to audit trails.



It is proposed that two days will be required on site by the Audit Team to undertake the audit site inspection, interviews, and onsite data verification, supported by up to one day additional remote auditing via Microsoft Teams or similar, if required. Timing and activities for the onsite component of the audit will be outlined in an Audit Plan to be prepared prior to the Audit Team’s attendance onsite.

3.2.2 Task 2b - Compliance Evaluation

SLR will complete an assessment of the Project’s performance and compliance against the audit criteria. Assessment of compliance will be undertaken as per the adopted best practice audit protocols and approaches. This assessment will be undertaken throughout the audit program, incorporating onsite observations and data validation, and offsite desktop review of input information both prior to, and following the onsite component of the audit.

The compliance status for each audit criterion will be determined in accordance with the compliance status descriptors as outlined in Table 1.

Table 1: Compliance Status Descriptors

Assessment Status	Description
Compliant	A rating of ‘compliance’ is given when the auditee has complied with a condition or element of a condition.
Non-Compliant	A rating of ‘non-compliance’ is given when the auditee has not met a condition or an element of a condition.
Not Applicable	A rating of ‘not applicable’ at the time of the audit is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced or a requirement has not been triggered.
Observations	An ‘observation’ may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.
Note: The above ratings will be used by the approved independent auditor. They will also to be used when measuring compliance for management plans, reports, or programs etc (however described) required by conditions.	

3.3 Task 3 – Audit Exit and Reporting

3.3.1 Task 3a - Draft Audit Report and Findings Preparation

The audit methodology and processes, findings of performance and compliance assessment, and any recommended measures/actions to improve correct non-compliances and the environmental performance of the development activities will be incorporated into a Draft Audit Report to be prepared in the approved form to address the scope of the audit:

- The Audit Report will be presented in the prescribed form (as per the Audit Guidelines); supporting information, including Audit Protocols and other information, will be presented in the audit reporting where appropriate.
- The Audit Report will be presented as a summary report outlining compliance and supporting evidence against each relevant audit criterion, addressing overall compliance against the audit criteria, and key recommendations.
- Findings and recommendations included in the Audit Report will aim to be practical and presented in a manner which will facilitate timely and effective implementation.



- The draft audit report will be provided electronically to Stanmore.

3.3.2 Task 3b - Audit Exit Meeting

Following submission of the draft audit report to Stanmore, and prior to finalisation of the report, SLR will facilitate an Audit Exit Meeting with audit and management representatives as nominated by Stanmore.

The Audit Team will present the audit findings and discuss the suggestions for improvement. Acknowledgements will be made, and the key stakeholders will have an opportunity to ask questions.

This meeting will be convened via Microsoft Teams or similar video conferencing platform.

3.3.3 Task 3c - Final Audit Report

Following receipt of feedback/comments from Stanmore, the Audit Report will be finalised and issued to Stanmore for submission to DCCEEW. Finalisation of the audit report will include QA/QC of the report and audit findings.

SLR will provide recommendations in the audit report, which Stanmore may use to inform development of an audit action plan and/or to support an application for amendment to the EPBC approval, should Stanmore deem that to be warranted. Following finalisation, the report will be provided electronically in a format suitable for submission to DCCEEW. It will be the responsibility of Stanmore to submit the completed report to DCCEEW.

4.0 Closure

We trust this Audit Criteria and Methodology Statement provides sufficient detail for your current requirements. Should you require additional information or clarification please do not hesitate to contact me on 0408 052 844.

Yours sincerely

SLR Consulting Australia Pty Ltd



Anna Cochrane, BSc GDip SoilSci
Principal Consultant – Environmental Approvals,
Closure & Management
Certified Lead Auditor – Environment (C 427136
Exp: 17Mar2026)

DCCEEW Approved Auditor for Isaac Downs
EPBC Compliance Audit, 2025

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Stephen Shoesmith
Principal Consultant – Environmental
Approvals, Closure & Management
Certified Lead Auditor – Environment (C-
427136, exp. 23 Jul 2025)

DCCEEW Approved Auditor for Isaac Downs
EPBC Compliance Audit, 2025

sshoesmith@slrconsulting.com



Appendix A Audit Criteria and Methodology Template

Audit Criteria and Methodology Statement

Isaac Downs Project – EPBC Act Referral 2019/8413 **Independent Audit 2025**

Stanmore IP South Pty Ltd

SLR Project No.: 623.030235.00001

7 October 2025



CONDITIONS OF EPBC ACT APPROVAL						
EPBC Approval Condition [No.]		APPROVAL CONDITION				
		Proposed Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding (COMPLIANT, NON-COMPLIANT OR NTO APPLICABLE)
Part A – Conditions specific to the action						
Maximum Impact Limits						
1	The approval holder must not impact beyond the limits of the project area.	Using a desktop, review of the site boundaries and conduct a site visit of boundary area, checking for evidence of keeping within boundary limits.				
2	The approval holder must not impact more than: a) 131.9 ha of Koala (<i>Phascolarctos cinereus</i>) habitat ; b) 120.9 ha of Greater Glider (<i>Petauroides volans</i>) habitat ; c) 66.6 ha of Squatter Pigeon (southern) (<i>Geophaps scripta scripta</i>) breeding habitat ; d) 55.5 ha or Squatter Pigeon (southern) (<i>Geophaps scripta scripta</i>) foraging habitat ; and e) 173.5 ha of Ornamental Snake (<i>Denisonia maculata</i>) habitat .	Habitat Mapping against PTDs applicable to the Report period would be undertaken and compared to the confirmed disturbed areas from the 2023 Compliance Report.				
Environmental Offset Requirements						
3	To compensate for the impacts to habitat for listed threatened species up to the limits specified in condition 2.a to 2.d, the approval holder must, prior to the commencement of the action and for the duration of the	OAMP Reporting to be reviewed. Confirm this was written prior to the commencement of action and				



CONDITIONS OF EPBC ACT APPROVAL						
	approval, implement the Offset Area Management Plan (OAMP) .	maintained throughout the duration of approval.				
4	To compensate for the impacts to Ornamental Snake (Denisonia maculata) habitat up to the limits specified in condition 2.e, the approval holder must submit an Ornamental Snake Offset Area Management Plan (OS-OAMP), prepared by a suitably qualified ecologist and consistent with the Environmental offsets policy , within 12 months of the date of the commencement of the action for the written approval of the Minister. The approval holder must implement the approved OS-OAMP, and provide written evidence to the department , within 6 months of the approval of the OS-OAMP.	Confirm a suitably qualified ecologist prepared an OS-OAMP for the Ornamental Snake (Denisonia maculata) habitat impacts. Ensure it is consistent with the Environmental offsets policy. Confirm dates of the commencement of the action is within 12 months with written approval from the Minister.				
5	The approval holder must not impact more than 120 ha of Ornamental Snake (Denisonia maculata) habitat unless the OS-OAMP has been approved by the Minister in writing.	Confirm there is no more than 120ha of Ornamental Snake (Denisonia maculata) habitat disturbance through compliance reporting, seek evidence of keeping within the bounds of the OS-OAMP.				
6	For every hectare of Ornamental Snake (Denisonia maculata) habitat impacted prior to approval of the OS-OAMP (i.e. prior clearance), the approval holder must provide an offset in addition to the offset for the total impact to Ornamental Snake (Denisonia maculata) habitat .	Check compliance reporting of habitat disturbance through the OS-OAMP, check against dates of approval. If habitat has been removed prior, determine the total additional habitat offset. ($\leq 173.5 \text{ ha} + \text{prior clearance}$).				
	Note: Condition 6 requires the area of habitat to be input into the impact calculator of the Offsets assessments guide					



CONDITIONS OF EPBC ACT APPROVAL						
	to be the total area of habitat impacted plus prior clearance (≤173.5 ha + prior clearance).					
OS-OAMP						
7	<p>The approval holder must ensure the OS-OAMP required under condition 4 includes the following:</p> <p>a. details to demonstrate how the offset(s) proposed compensates for the impacts to Ornamental Snake (Denisonia maculata) habitat and any prior clearance in accordance with the Environmental offsets policy;</p> <p>b. a description of the offset(s), including location, size, condition, environmental values present and surrounding land uses;</p> <p>c. relevant baseline data and other supporting evidence, including results from field validation surveys and quantifiable ecological data, that documents the presence or likely presence of the Ornamental Snake (<i>Denisonia maculata</i>) and the quality of the Ornamental Snake (Denisonia maculata) habitat within the offset area(s);</p> <p>d. an assessment of the site habitat quality score(s);</p> <p>e. details of how the offset area(s) will provide connectivity with other habitats and biodiversity corridors and/or will contribute to a larger strategic offset for the Ornamental Snake (Denisonia maculata);</p> <p>f. a description and maps (including shapefiles) to clearly define the location and boundaries of the offset area(s), accompanied by the offset attributes (including physical address of the offset area(s), coordinates of the boundary points in decimal degrees and the size of the environmental offsets in hectares);</p> <p>g. specific offset completion criteria derived from the site habitat quality score to demonstrate the improvement in the habitat quality score for Ornamental Snake in the offset area(s) over the period of effect of this approval</p>	<p>a) Check the OS-OAMP details how the offset(s) compensates the impacts to the Ornamental Snake (<i>Denisonia maculata</i>) habitat plus any prior clearance in accordance with the Environmental offsets policy</p> <p>b) review the descriptions of the offsets within the OS-OAMP</p> <p>c) review relevant baseline data and supporting evidence from any field validation surveys, quantifiable ecological data, documentation of presence or likely presence of Ornamental Snake (<i>Denisonia maculata</i>) and the quality of the habitat within the offset areas.</p> <p>d) conduct a site habitat quality score.</p> <p>e) review and discuss how offset areas chosen will provide adequate connectivity with other habitats and</p>				



CONDITIONS OF EPBC ACT APPROVAL

<p>h. details of the management actions (including timing, frequency, duration and method of outcome measurement), to be carried out to meet the offset completion criteria (the management actions proposed must be consistent with the Environmental management plan guidelines and the approved conservation advice);</p> <p>i. interim performance targets that set targets at 5-yearly intervals for expected progress towards the completion criteria set in condition 7.g;</p> <p>j. details of the nature, timing and frequency of monitoring to inform progress against achieving the interim performance targets (the frequency of monitoring must be sufficient to track progress towards each set of milestones, and sufficient to determine whether the offset area(s) is/are likely to achieve those milestones in adequate time to implement all necessary corrective actions);</p> <p>k. timing for the implementation of corrective actions if monitoring activities indicate the interim performance targets have not been achieved;</p> <p>l. a risk analysis and a risk management and mitigation strategy for all risks to the successful implementation of the OS-OAMP and timely achievement of the offset completion criteria, including for if the offset fails to achieve and maintain the completion criteria; and</p> <p>m. the legal mechanism that will be used for legally securing the offset area(s), such that legal security remains in force over the offset area for at least the period of effect of this approval.</p>	<p>biodiversity corridors. This needs to be consistent with the larger strategic offset for the Ornamental Snake (Denisonia maculata)</p> <p>f) review shapefiles of location and boundaries of the offset area(s) including the offset attributes, coordinates of boundary points in decimal degrees and the size of the environmental offsets in hectares.</p> <p>g) compare the initial habitat quality score and determine if there has been improvement to the recent habitat quality score of the Ornamental Snake in the offset area(s) over the period of effect of this approval.</p> <p>h) review management actions (including timing, frequency, duration and method of outcome measurement) and determine if it meets the offset completion criteria 9 (the management actions proposed must be consistent with the Environmental management plan guidelines</p>				
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CONDITIONS OF EPBC ACT APPROVAL						
		and the approved conservation advice) i) review the interim performance targets for the 5 yearly intervals for expected progress towards the completion of habitat quality assessments in condition 7.g. j) review their monitoring processes, ensure is consistent with this condition. k) review the timing of the corrective actions if interim performance targets are not being achieved. l) review the risk analysis and risk management and mitigation strategy for all risks identified in the OS-OAMP m) review the legal mechanisms in place for legally securing the offset area(s).				
Offset implementation Reporting						
8	Within 60 business days after the end of each 5 year period from the date of implementation of the OAMP , until the expiry of this approval, the approval holder must submit	Confirm they have published a report, and the report contains all the details listed				



CONDITIONS OF EPBC ACT APPROVAL						
	<p>to the department, and publish on the website for the remainder of the period of the approval, a report that assesses progress towards achieving and maintaining the completion criteria specified in the OAMP and approved OS-OAMP. The report must:</p> <p>a. detail performance achieved against all interim performance targets in the period since the date of implementation with more detail in respect of the period since the last report;</p> <p>b. describe the results and effectiveness of all management actions implemented during the period the subject of that report;</p> <p>c. include all monitoring results, including all confirmed sightings of listed threatened species in a format consistent with the Guidelines for biological survey and mapped data; and</p> <p>d. detail any interim performance targets not met and describe all corrective actions taken and evaluate their effectiveness.</p> <p>Once the completion criteria are achieved, they must be maintained by the approval holder for the remainder of the duration of this approval.</p>	<p>in condition 8.a, 8.b, 8.c and 8.d</p>				
9	<p>Within 60 business days of the 20th anniversary of the date of implementation of the OAMP and the OS-OAMP, the approval holder must submit a report that provides evidence substantiating whether the offset area(s) has/have fully achieved and maintained the completion criteria. If all completion criteria have not been achieved within 20 years from the date of implementation of the OAMP and the OS-OAMP, the approval holder must provide, within 6 months, additional environmental offsets approved by the Minister in writing consistent with the Environmental offsets policy.</p>	<p>After the 20 year anniversary of the date of implementation of the OAMP a review of the report must be conducted, evidencing the compliance with this condition.</p>				



CONDITIONS OF EPBC ACT APPROVAL						
Legal Securing of Environmental Offsets						
10	The approval holder must legally secure the offset area(s) described in the OAMP and approved OS-OAMP within 12 months of the approval of the associated plan. The OAMP and approved OSOAMP must be attached to the legal mechanism used to legally secure the associated offset area(s).	Review proof of dates of the offset area(s) legally secured within the 12 months of the approval of the plan.				
11	The approval holder must provide evidence to the department within 5 business days of the legal mechanism being executed.	Review the dates of submission, to determine if the client provided evidence to the department within the 5 business days.				
12	The legal mechanism used to legally secure the offset area(s) described in the OAMP and approved OS-OAMP must remain in force from the date of obtaining legal security and for at least the remaining period of effect of this approval.	Determine if legal mechanism used to legally secure offset area(s) are in force from the date of obtaining legal security for the remainder of the period of approval in effect.				
13	The approval holder must implement the Significant Species Management Plan (SSMP) for the duration of mining activities .	Confirm and review documentation if approval holder has implemented a Significant Species Management Plan (SSMP) during mining activities.				
Conservation of the Koala and Greater Glider in the Bowen Basin						
14	The approval holder must contribute a single payment equivalent to the value of \$23,000 (GST exclusive and indexed in line with CPI on the date of this approval) to a program specified by the Minister in writing where the contribution will be used for the better protection and long-	Check if approval holder has submitted \$23,000 (GST exclusive and indexed in line with CPI on the date of this				



CONDITIONS OF EPBC ACT APPROVAL						
	term conservation of the Koala (<i>Phascolarctos cinereus</i>) and Greater Glider (<i>Petauroides volans</i>) in the Bowen Basin.	approval) to a program specified by the Minister				
15	Within 3 months of the date the Minister specifies the program described in condition 14, the approval holder must provide notice to the department , with documentary evidence, that the payment required under condition 14 has been made.	If minister has specified determine a program, check the dates of approval holder has provided evidence of payment to the department within the 3 months				
Groundwater Dependent Ecosystems (GDEs)						
16	The approval holder must implement the GDE Management and Monitoring Plan for at least the duration of this approval.	Check and review the GDE Management and Monitoring Plan (GDEMMP)				
17	The approval holder must submit a revised GDE Management and Monitoring Plan (GDEMMP) for the written approval of the Minister within 2.5 years from the date of this approval. The revised GDEMMP must be adjusted to include the raw baseline data and to set the trigger values and disturbance thresholds . The approval holder must implement the revised GDEMMP as approved by the Minister within 12 months of submitting to the Minister .	Confirm approval holder has submitted a revised GDEMMP for written approval of the minister within 2.5 years from date of approval. Confirm the revised GDEMMP contains raw baseline data and to set the trigger values and disturbance thresholds. Confirm the approval holder has implemented the revised GDEMMP within 12 months of submission.				
18	If the approval holder detects that a trigger value has been reached or exceeded, the approval holder must report this to the department within 5 business days of the detection. Unless evidence can be provided, to the Minister's	Determine if the trigger value has been reached or exceeded and what documentation has been				



CONDITIONS OF EPBC ACT APPROVAL						
	satisfaction, that the trigger value exceedance is not attributable to mining activities, corrective actions must be implemented within 60 business days of the detection.	submitted and within 5 business days of detection. Confirm when corrective actions were implemented (needs to be within 60 business days).				
19	If corrective actions fail to halt or reverse impacts to GDEs within 24 months from the detection of a trigger level being reached or exceeded, and a disturbance threshold has been exceeded, the approval holder must submit a GDE Offset Strategy within 6 months for the written approval of the Minister . The approval holder must implement the approved GDE Offset Strategy within 12 months of submitting to the Minister .	If threshold is hit confirm the approval holder has submitted a GDE Offset Strategy (GDEOS) within 6 months with written approval from the Minister. Confirm the approved GDEOS has been implemented within 12 months of submission.				
20	Provided no trigger value has been reached or exceeded under condition 18, resulting in the requirement for a GDE Offset Strategy under condition 19, the approval holder must, within 6 months of completing follow-up surveys , submit a report to the Minister that provides: a. a summary memorandum detailing the current habitat quality score of the GDEs ; b. a comparison of the follow-up surveys to the baseline GDE dataset provided in the approved revised GDEMMP, to identify any significant departure from the habitat quality score and/or extent of GDEs when compared to these metrics prior to the commencement of the action ; and c. commitments to any future monitoring requirements.	a) Review follow-up surveys, and submission reports to the minister provides a current habitat quality score of the GDEs. b) review the comparison of the follow up surveys against baseline GDE dataset provided in the approved revised GDEMMP. c) review what the commitments to future monitoring entail.				



CONDITIONS OF EPBC ACT APPROVAL						
Part B - Standard administrative conditions						
Notification of Date of Commencement of the Action						
21	The approval holder must notify the department in writing of the date of commencement of the action within 10 business days after the date of the commencement of the action .	Confirm dates of notice to the department for the Commencement of action was submitted within 10 business days.				
22	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister .	Confirm dates of commencement. IF the approval holder did not commence within 5 years, then the approval holder needs to provide evidence of correspondence with the Minister and not commence without that agreement.				
Compliance Records						
23	The approval holder must maintain accurate and complete compliance records .	Review all documentation of compliance records and review accuracy and completeness				
24	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.	For any requests from the department, approval holder must provide an electronic copy within their compliance records to review.				
	Note: Compliance records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act , and or used to verify compliance with the conditions. Summaries of the result of					



CONDITIONS OF EPBC ACT APPROVAL						
	an audit may be published on the department's website or through the general media.					
Submission and Publication of Plans						
25	<p>The approval holder must:</p> <p>a. submit plans electronically to the department;</p> <p>b. unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of the date of:</p> <p style="padding-left: 40px;">i. this approval, if the approved version of the plan is specified in these conditions, or</p> <p style="padding-left: 40px;">ii. the date a plan has been approved by the Minister in writing, if the plan requires the approval of the Minister;</p> <p>c. exclude or redact sensitive ecological data or commercial or personal data from plans published on the website or provided to a member of the public; and</p> <p>d. keep plans published on the website until the end date of this approval.</p>	<p>Review all plans electronically submitted to the department was within 20 business days (Unless agreed otherwise by the minister),</p> <p>Ensure there is exclusion and redaction of sensitive information of ecological data or commercial, personal data.</p> <p>Determine if the plans are kept on the website until end of approval.</p>				
26	<p>The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under all plans is prepared in accordance with the Guidelines for biological survey and mapped data, or subsequent revision, and submitted electronically to the department in accordance with the requirements of those plans.</p>	<p>Ensure approval holder's monitoring data complies with the Guidelines for biological survey and mapped data, subsequent revision and submitted to the department</p>				
Annual Compliance Reporting						
27	<p>The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:</p>	<p>Confirm and review the annual compliance report was conducted and completed within 12 months following the date of commencement of the</p>				



CONDITIONS OF EPBC ACT APPROVAL						
	<p>a. publish each compliance report on the website within 60 business days following the relevant 12 month period;</p> <p>b. notify the department by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication;</p> <p>c. keep all compliance reports publicly available on the website until this approval expires;</p> <p>d. exclude or redact sensitive ecological data or commercial or personal data from compliance reports published on the website; and</p> <p>e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the department within 5 business days of publication.</p>	<p>action or different date agreed to with the Minister</p> <p>Confirm if the compliance report has been published on the website within 60 business days following the report</p> <p>Confirm the reports are publicly available until the approval expires</p> <p>Exclusion and redaction of ecological or sensitive information have been completed on all published reports</p> <p>In the event of redaction, a full compliance report has been submitted to the department within 5 business days.</p>				
	<p>Note: Compliance reports may be published on the department's website.</p>					
Reporting Non-compliance						
28	<p>The approval holder must notify the department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no</p>	<p>Any incidents or non-compliance with the conditions and have been notified to the department within two business days after</p>				



CONDITIONS OF EPBC ACT APPROVAL					
	<p>later than two business days after becoming aware of the incident or non-compliance. The notification must specify:</p> <p>a. any condition which is or may be in breach;</p> <p>b. a short description of the incident and/or non-compliance; and</p> <p>c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.</p>	<p>awareness of the incident and non-compliance.</p> <p>Within the notification confirmation the approval holder has confirmed the condition that has been breached,</p> <p>A short description has been provided of the incident or non-compliance.</p> <p>Location (including coordinates) date, time has been provided.</p>			
29	<p>The approval holder must provide to the department the details of any incident or non compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:</p> <p>a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;</p> <p>b. the potential impacts of the incident or non-compliance; and</p> <p>c. the method and timing of any remedial action that will be undertaken by the approval holder.</p>	<p>Review dates of corrective actions submitted to the department for any incidents or non-compliance with the conditions of commitments made in the plans have been provided within 10 business days.</p> <p>The notification must provide corrective actions,</p> <p>Potential impacts resulting from the incident or non-compliance</p> <p>And method and timing of any remedial action undertaken.</p>			



CONDITIONS OF EPBC ACT APPROVAL						
Independent Audit						
30	The approval holder must ensure that independent audits of compliance with the conditions are conducted when requested in writing by the Minister .	Provided proof that the independent audits of compliance are conducted upon Minister's request.				
31	For each independent audit , the approval holder must: <ul style="list-style-type: none"> a. provide the name and qualifications of the independent auditor and the draft audit criteria to the department; b. only commence the independent audit once the audit criteria have been approved in writing by the department; and c. submit an audit report to the department within the timeframe specified in the approved audit criteria. 	Evidence of independent audit must provide Name and qualifications of the independent auditor and the draft audit criteria have been provided to the department Submission of audit report to the department within a timeframe specified in the approved audit criteria has been met.				
32	The approval holder must publish the audit report on the website within 10 business days of receiving the department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	Submission of the audit report published on the website within 10 business days of receiving the department's approval of the audit report.				
Revision of Action Management Plans						
33	The approval holder may, at any time, apply to the Minister for a variation to a plan approved by the Minister , or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act . If the Minister approves a revised plan, the approval holder must	Ensure any variations of management plans have been submitted for approval by the minister in accordance with the conditions and requirements of section 143A of the EPBC Act.				



CONDITIONS OF EPBC ACT APPROVAL						
	then, from the date specified, implement the revised plan in place of the previous plan .	Confirm with approval holder if implementation of variation has been conducted.				
Completion of the Action						
34	Within 20 business days after the completion of the action , the approval holder must notify the department in writing and provide completion data .	Notification to the department within 20 business days after completion of action was submitted with completion data.				





Appendix B Audit Team

Audit Criteria and Methodology Statement




Isaac Downs Project – EPBC Act Referral 2019/8413
2025

Independent Audit

Stanmore IP South Pty Ltd

SLR Project No.: 623.030235.00001

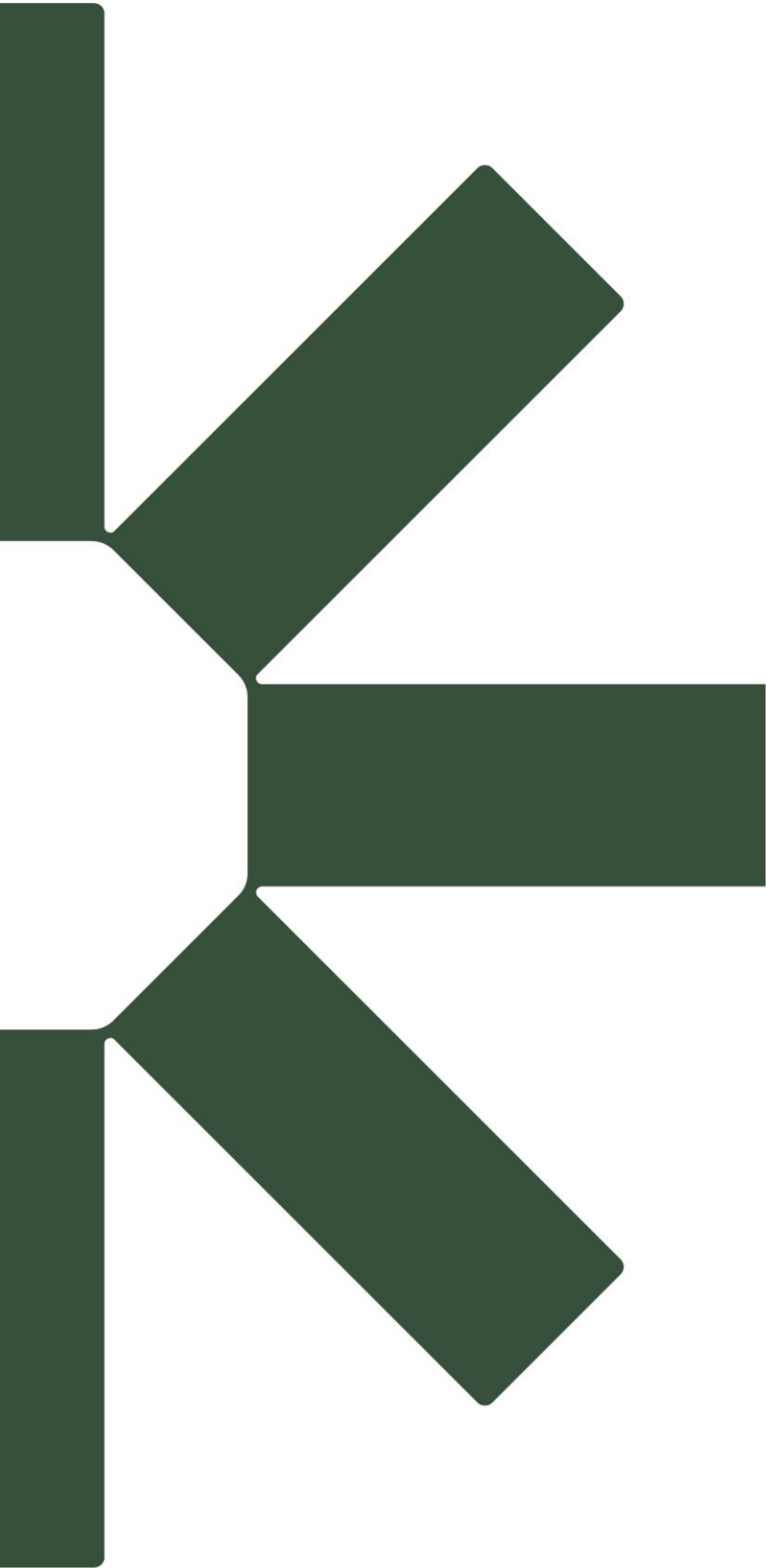
7 October 2025

Name & Role	Qualifications	Experience
DCCEEV APPROVED INDEPENDENT AUDITORS		
<p>Anna Cochrane Principal Consultant - Environmental Approvals, Closure & Management Certified Lead Auditor Townsville, QLD Project Manager / Auditor</p> 	<p>Graduate Diploma in Soil Science Bachelor of Science (Geology) Lead Auditor (ISO 14001:2015 Environment; Certificate No. C-427136, expires 17 Mar 2026) Internal Auditor (ISO 9001 Quality), ISO 22000 Food Safety, ISO 31000 Risk, ISO 45001 OH&S, ISO 55001 Asset) Certificate IV (Workplace Assessment & Training) Lead ICAM Incident Investigator) Level 1 Incident Controller – AIIMS</p>  	<p>Anna is an environmental, safety and systems manager with almost 30 years' experience in contaminated sites, industrial facilities, water treatment (desalination), infrastructure and waste management matters across a wide range of major project, operational and green/brownfield facilities, including senior environmental manager / specialist roles across a wide range of projects and operational facilities.</p> <p>Anna was an Authorised Officer of the Victorian Environment Protection Authority, was accredited as Environmental Auditor for the Victorian Desalination Project and has been accepted by NSW DPHI as Environmental Auditor for conduct of Independent Environmental Audits of major project approvals in NSW. Anna has also completed several independent Third-Party Environmental Audits for project Environmental Approvals in Queensland.</p> <p>Spending 6 years as Environmental Manager for the Victorian Desalination Project, Anna was responsible for overseeing the environmental management of 256Ha rehabilitation of former coal mining and agricultural land to develop the VDP's Ecological Reserve. In addition, Anna was responsible for managing natural and feature landscapes within the 65Ha desalination plant, 85km pipeline easement and other associated infrastructure. Since joining SLR in January 2022, Anna has been engaged in compliance auditing and supporting the development of environmental approvals, rehabilitation plans including Progressive Rehabilitation and Closure Plans (PRCPs) for a range of mines in QLD and NSW.</p> <p>Anna's experience includes environmental assessment, remediation, compliance, due diligence, licensing, incident response, Integrated Management Systems (IMS), auditing, and certification management. Anna has particular interest in supporting operational HSEQ compliance and performance within complex regulatory, contractual compliance and asset management frameworks. Anna was awarded runner-up in Suez Australia 2021 Innovation Awards, for development and implementation of innovative waste reduction and recycling initiatives.</p>
<p>Stephen Shoemith Principal Consultant - Environmental Assessment & Management Certified Lead Auditor Newcastle, NSW Auditor</p>	<p>Master of Integrated Environmental Management Bachelor of Environmental Science Lead Auditor (ISO 14001:2015 Environment; Certificate No. C-427136, expires 23 Jul 2026)</p>	<p>Stephen is a Principal Consultant in the SLR Environmental Assessment & Management team and has demonstrated environmental auditing, management, impact assessment and policy experience.</p> <p>Stephen has significant Coal Mining experience, centred in NSW (site and corporate experience) in environmental management, project management, extraction plans, environmental impact assessment, land restoration, decommissioning and closure planning, risk assessment as well as facilitation and preparation of Management Plans.</p>



Name & Role	Qualifications	Experience
	 	<p>Stephen has also worked as a regulator within the NSW Department of Planning, Industry and Environment, which included post approval reviews, Policy reforms and Major Project Assessments. Stephen also has a range of experience undertaking compliance reviews, environmental compliance audits and supporting environmental compliance needs for a wide range of major projects and operational industrial facilities.</p>
ADDITIONAL AUDIT PROJECT SUPPORT		
<p>Helena Howell Principal Consultant - Environmental Management, Permitting & Compliance Mackay</p> <p>Project Director / QA/QC</p> 	<p>Bachelor of Science (Australian Environmental Studies)</p>	<p>Helena joined SLR in 2023 and, as a Principal Consultant, brings with her over 20 years' practical experience in both site based and corporate environment positions across mining, minerals processing, construction and manufacturing sites. She has more than 10 years direct operational experience in coal and metalliferous mines both open cut and underground and understands the nature of the risks and management strategies inherent to such operations.</p> <p>Helena's environmental experience is complemented by her project management skills which have been developed whilst delivering complex programs of work, specifically in the mining, manufacturing, and linear infrastructure sectors. Examples include the timely delivery of land access and environmental approvals function for a national construction program and, the timely delivery of legislative reforms including, conducting legislative reviews and stakeholder engagement, submission of legislative amendments to Queensland Cabinet for consideration, and implementation of subsequent amendments.</p> <p>As a consultant, Helena has delivered several PRCPs and major EA Amendments for high profile sites across Queensland and has been involved in compliance and approval processes within the mining and construction industries within Queensland, Western Australia and the Northern Territory.</p>
<p>Isabella Farina Project Consultant – Environment, Management, Permitting & Compliance Townsville</p> <p>Project Support</p> 	<p>Bachelor of Science (Zoology & Ecology)</p>	<p>Isabelle has been a part of the environmental management, permitting and compliance team at SLR since July 2023. During this time, she has had the opportunity to develop her skills within a mix of industries including mining and infrastructure.</p> <p>As part of her experience within SLR she has developed knowledge of relevant environmental legislation and acoustics monitoring practices to support projects such as, EA amendments and applications, compliance audits, mine closure planning, management plan creation and approvals registers for works. She has also gained experience with a range of programs such as R Script and ArcGIS Pro.</p>





Making Sustainability Happen



**Appendix C DCCEEW Audit
Request & Audit
Approvals**



Our reference: EPBC 2019/8413

Belinda Parfitt
Principal Environment & Community
Stanmore IP South Pty Ltd
PO Box 635
MORANBAH QLD 4744

Dear Belinda

**Direction to conduct Independent Audit - Issac Downs Project, near Moranbah, Queensland
EPBC 2019/8413**

I am writing in relation to the Issac Downs project, which was approved on 26 May 2021 under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), with 34 conditions of approval (EPBC 2019/8413).

The Department of Climate Change, Energy, the Environment and Water (department) requests that an independent audit of compliance with the conditions of the EPBC 2019/8413 approval be undertaken.

Condition 30 of the approval states that the approval holder must ensure that independent audits of compliance with the conditions are conducted when requested in writing by the Minister.

The Audit Scope and Audit Criteria must cover project activities and requirements of the conditions of approval during the period from 9 August 2022 to the end of the audit.

I request that you provide the name and qualifications of the proposed auditor to the department no later than 20 business days from the date of this letter. It is your responsibility to ensure the auditor is independent as defined by your conditions of approval and in accordance with the attached Independent Audit and Audit Report Guidelines.

If you have any questions regarding this matter, please contact Keith Horwood at audit@dcceew.gov.au.

Yours sincerely

Kim Morgan
A/g Director Environmental Audit
Compliance and Enforcement Branch
1 August 2025

Attachments:

Attachment A – EPBC 2019/8413 Varied conditions of approval
Attachment B – Independent Audit and Audit Report Guidelines



Australian Government
**Department of Climate Change, Energy,
the Environment and Water**

Our ref: EPBC 2019/8413

Belinda Parfitt
Principal Environment & Community
Stanmore IP South Pty Ltd
PO Box 635
MORANBAH QLD 4744

Dear Belinda

**Approval of Audit Criteria and Methodology – Isaac Downs Project, near Moranbah, Queensland
EPBC 2019/8413**

I refer to your correspondence dated 7 October 2025, submitting the audit criteria and methodology for the independent audit of the Isaac Downs Project (EPBC 2019/8413). I note the project was approved under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 26 May 2021.

I acknowledge receipt of the details of the nominated audit team of Anna Cochrane and Stephen Shoesmith from SLR Consultancy Australia Pty Ltd.

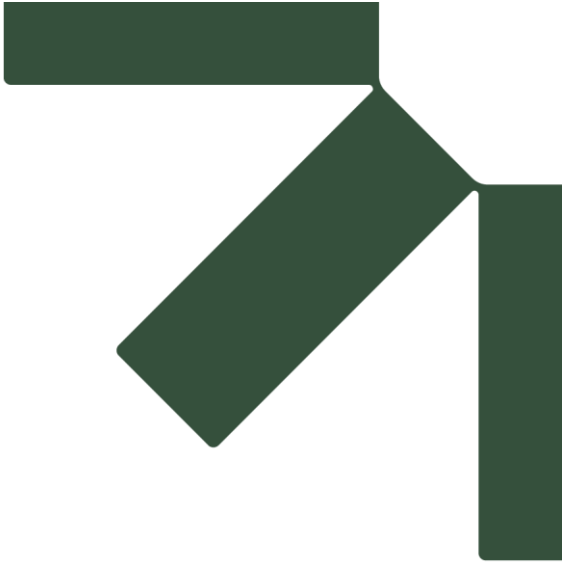
I approve the audit criteria and methodology prepared by SLR consultancy Australia, and request that you submit the independent audit report to the Department of Climate Change, Energy, the Environment and Water by no later than 2 February 2026. I look forward to receiving a copy of the audit report.

If you have any questions regarding this matter, please contact Keith Horwood at audit@dcceew.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Th' followed by a flourish.

Thomas Long
Director Environmental Audit
Compliance and Enforcement Branch
10 October 2025



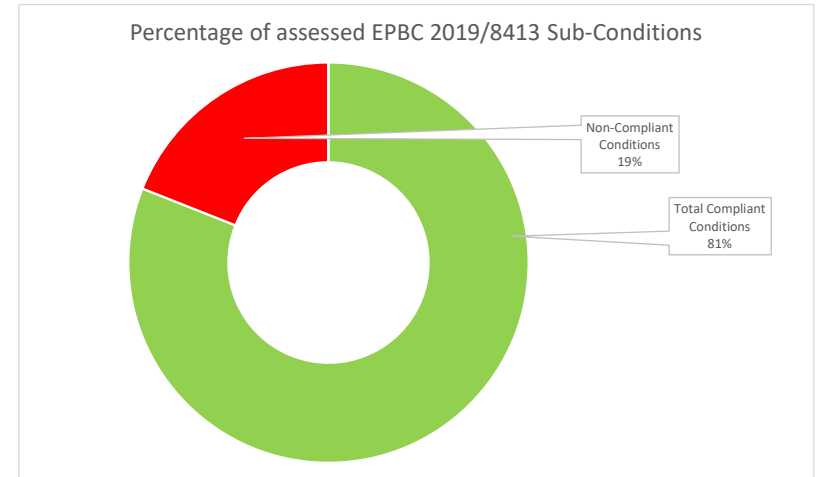
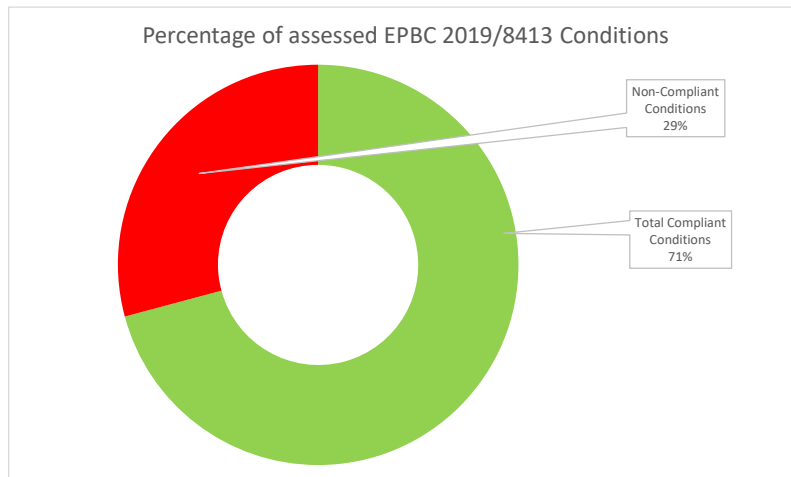
Appendix D Audit Compliance Table

Third-Party Environmental Audit

Proponent Stanmore IP South Pty Ltd
Approval: EPBC Approval EPBC 2019/8413
Project: Isaac Downs Coal Mine
Approval Authority Department of Climate Change, Environment, Energy and Water (DCCEEW)
Audit Period 9 August 2022 - 30 January 2026
Site Visit Dates 9 & 10 December 2025

Compliance Status	EPBC Approval 2019/8413 Conditions	Total Conditions	Percentage of total Conditions	Percentage of assessed Conditions
Compliant	14	14	41.18%	58.33%
Compliant with observation	3	3	12.50%	12.50%
Total Compliant Conditions	17	17	53.68%	70.83%
Non-Compliant Conditions	7	7	20.59%	29.17%
Not Triggered	10	10	29.41%	n/a
Note only	0	0	0.00%	n/a
Total conditions	34	34	100.00%	n/a
Total assessed conditions (excluding not triggered and notes)	24	24	70.59%	100.00%

EPBC Approval EPBC 2019/8413 Sub-conditions	Total Sub-Conditions	Percentage of total Sub-Conditions	Percentage of assessed Sub-Conditions
43	43	52.44%	74.14%
4	4	6.90%	6.90%
47	47	59.34%	81.03%
11	11	13.41%	18.97%
22	22	26.83%	n/a
2	2	2.44%	n/a
82	82	100.00%	n/a
58	58	70.73%	100.00%



EPBC Approval EPBC 2019/8413

Proponent: Stanmore IP South Pty Ltd
Approval: EPBC Approval EPBC 2019/8413
Project: Isaac Downs Coal Mine
Approval Authority: Department of Climate Change, Environment, Energy and Water (DCCEEW)
Audit Period: 9 August 2022 - 30 January 2026
Site Visit Dates: 9 & 10 December 2025

Y - Compliance	Y - Compliance
NA - Not applicable	NA - Not applicable
Note only	Note only

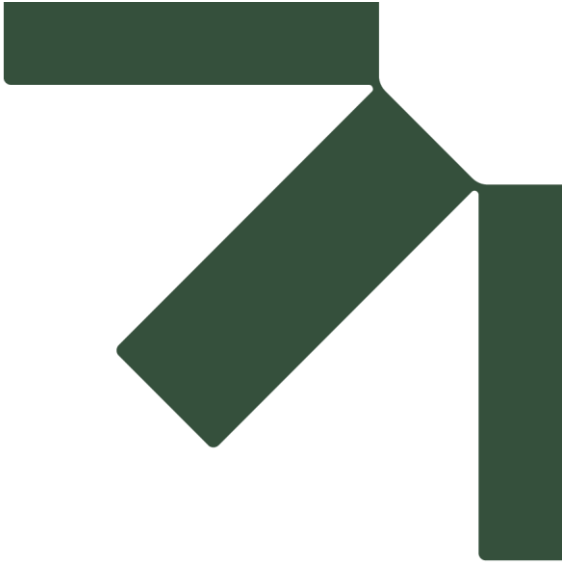
EPBC Approval Condition Number	Compliance Requirement	Proposed Verification Method	Audit Evidence Considered	Documents Sighted	Determination	Compliance Finding - EPBC Approval Primary Conditions	Compliance Finding - EPBC Approval Sub-Conditions
Part A – Conditions specific to the action							
Maximum Impact Limits							
1	The approval holder must not impact beyond the limits of the project area.	Using a desktop, review of the site boundaries and conduct a site visit of boundary area, checking for evidence of keeping within boundary limits.	-Sighted disturbance overlays in Stanmore ESRI Geospatial (GIS) Portal - shows approved disturbance areas. Data is reviewed and refreshed annually as part of habitat clearance verification for annual EPBC compliance report. -Approved disturbance areas as defined in Project's EA and EPBC Approvals. -EPBC Annual Compliance Reports – 2023, 2024 & 2025. -Permit to disturb system implemented, includes assessment of approved disturbance areas & maps (examples sighted). -Annual EPBC disturbance area reconciliation maintained by Stanmore Environmental Representatives. -Site Inspection – sighted limit of disturbance markers, fencing and pegs. -Personnel interviews – described Permit to Disturb processes, disturbance area monitoring and corrective action protocols. Also indicated that in early 2025 a review was completed against all Stanmore sites. Isaac Downs was very clear where the boundary sits. This matter is checked annually through annual returns and annual EA audits. Permit to disturb has section on EPBC clearing. -Permits to Disturb – 182, 2023-04-001, 184, 194, 195, 196v3, 198, 202, 205, 209, 210, 213, 214, 220v3, 221, 223 -Authorised boundary spatial data. -NearMap & Google Earth imagery (retrieved 28 January 2025).	-Variation of Conditions Attached to Approval, Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413) -Environmental authority EA0002817, last reviewed 1 February 2024, effective 12 March 2025 -Stanmore Isaac Complex Operations Viewer - ESRI ArcGIS viewer - Permit to disturb IPC-ENV-PRO-02.08.04 F_RM 001 Permit to Disturb - Permit 220v3 SIGNED.pdf and associated map - Isaac Downs - Disturbance Permit #220v3 - Highway Clearing - South 02.09.2025 -EPBC Act Annual Compliance Report 2023, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 4 November 2023, Revision: 2 - SLR Consulting Australia Pty Ltd -EPBC Act Annual Compliance Report 2024, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 5 November 2024, Revision: 1 - SLR Consulting Australia Pty Ltd -EPBC Act Annual Compliance Report 2025, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 3 November 2025, Revision: 1 - SLR Consulting Australia Pty Ltd -Incident Report following non-compliance with conditions – Isaac Downs Project, EPBC 2019/8413, letter from Stanmore to DCCEEW, 16 November 2023 -Warning Letter - Contravention of Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) approval for Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413), 21 March 2024 -Letter: Warning Letter - Contravention of Environment Protection and Biodiversity Conservation Act 1999 for EPBC 2019/8413, 14 March 2023, Thomas Long - DCCEEW -Isaac Downs EPBC 2019/8413 - Annual Habitat Reconciliation - 2025/014 EPBC ID Clearing bp.xlsx -Permits to Disturb - Polygons - from 201710 bp at 2025/014.xlsx -Permits to Disturb – 182, 2023-04-001, 184, 194, 195, 196v3, 198, 202, 205, 209, 210, 213, 214, 220v3, 221, 223 -Approved disturbance zone shapefiles -Site visit 9 & 10 December 2025 -Personnel interviews	The 2023 EPBC Annual Compliance Report identified two areas of mapped disturbance that were outside the EPBC boundary but at the time had not been identified in the previous 2021/2022 compliance report or associated correspondence, including: 1. An area of approximately 0.2 ha associated with levee armour rock on the outside batter of the flood levee was identified outside the approval boundary. The disturbance occurred during the period of the previous compliance report; however, the area was not included in correspondence with the EPBC regulator and is required to be reported as a non-compliance in this compliance report. It is noted that this area was reported to the Queensland regulator as it was also outside approved area of the Environmental Authority. 2. A laydown pad located outside the Northwestern edge of the approval Boundary was identified. However, this area it was constructed prior to the project being referred under the EPBC Act. Disturbance of this area had been subject to self-assessment against EPBC matters and determined not to have significant impact on MNES. Therefore, this area is not considered relevant to the EPBC permit. Disturbance of levee constituted non-compliance with Condition 1 of EPBC 2019/8413. Stanmore notified DCCEEW of the above non-compliances in letter dated 23 November 2023. On 21 March 2024, DCCEEW issued a Warning Letter to Stanmore related to the non-compliance, the content of which also notes that the matter is finalised. To monitor compliance and minimise future risk of non-compliance with the approved disturbance areas, Stanmore has implemented a Permit to Disturb process and undertakes routine environmental inspections including monitoring operations are only within the marked and approved boundaries. In addition, Stanmore regularly reviews disturbance area polygons and maintains a habitat reconciliation process to further monitor compliance with Condition 1 of EPBC-8413. Compliance is further monitored through EPBC Annual Reporting, EA Annual Returns and EA audit processes. Given the non-compliance occurred during the current Audit Period (9 August 2022 to 30 January 2026, non-compliance with Condition 1 is identified for this Audit. However, the Auditor notes this non-compliance has previously been reported by Stanmore to DCCEEW, and the matter closed by DCCEEW via formal warning letter issued to Stanmore on 21 March 2024. The Auditor also notes Stanmore has maintained, and continues to maintain compliance with these requirements, and has implemented active monitoring and management measures to ensure ongoing compliance with requirements of the Project's approved impact boundary limits. Therefore, no further action with respect to the identified non-compliance is considered warranted as a result of this Audit. DCCEEW issued a Warning Letter to Stanmore on 14 March 2024, for contravention of Conditions 1, 28 and 29, understood to be related to matters arising from the 2021-2022 EPBC Annual Compliance Report findings (prior to commencement of this Audit Period), noting that DCCEEW consider the compliance matters for these issues to be closed. The Auditor notes that the non-compliance matters raised in this Warning letter occurred outside the current Audit period, therefore are not considered further in this Audit.	N - Non-compliance	N - Non-compliance
2	The approval holder must not impact more than:	Habitat Mapping against PTDs applicable to the Report period would be undertaken and compared to the confirmed disturbed areas from the 2023 Compliance Report.	As above	As above	Areas for associated fauna are monitored and internally approved via Stanmore's Permit to Disturb (PTD) process and are tracked via Stanmore's habitat reconciliation spreadsheet. At the time of this audit, the following estimate areas were recorded: - Koala: 46.67 ha (65.23 ha remaining until approval limit reached) - Greater Glider: 45.87 ha (75.03 ha remaining until approval limit reached) - Squatter Pidgeon (Breeding): 28.4 ha (38.2 ha remaining until approval limit reached) - Squatter Pidgeon (Foraging): 17.78 ha (37.72 ha remaining until approval limit reached) - Ornamental Snake: 134.71 ha (38.79 ha remaining until approval limit reached) The annual compliance reporting process also includes review and reconciliation of MNES species habitat mapping against PTD. Compliance for each of 2023, 2024 & 2024 reporting years.	Y - Compliance	Y - Compliance
2a	a) 131.9 ha of Koala (<i>Phascolarctos cinereus</i>) habitat.	As above	As above	As above		Y - Compliance	Y - Compliance
2b	b) 120.9 ha of Greater Glider (<i>Petauroides volans</i>) habitat.	As above	As above	As above		Y - Compliance	Y - Compliance
2c	c) 66.6 ha of Squatter Pigeon (southern) (<i>Geophaps scripta scripta</i>) breeding habitat.	As above	As above	As above		Y - Compliance	Y - Compliance
2d	d) 55.5 ha or Squatter Pigeon (southern) (<i>Geophaps scripta scripta</i>) foraging habitat.	As above	As above	As above		Y - Compliance	Y - Compliance
2e	e) 173.5 ha of Ornamental Snake (<i>Denisonia maculata</i>) habitat.	As above	As above	As above		Y - Compliance	Y - Compliance
Environmental Offset Requirements							
3	To compensate for the impacts to habitat for listed threatened species up to the limits specified in condition 2.a to 2.d, the approval holder must, prior to the commencement of the action and for the duration of the approval, implement the Offset Area Management Plan (OAMP).	OAMP Reporting to be reviewed. Confirm this was written prior to the commencement of action and maintained throughout the duration of approval.	-Stanmore project website includes current approved OAMP. -EPBC Annual Compliance Reports – 2023, 2024 & 2025 were issued within 3 months of every 12-month anniversary of the commencement of the action. Also indicate compliance and implementation of OAMP for the respective review periods and provided detailed review against the OAMP's Habitat Management Objectives. -Quarterly land management reports were provided for the offset area. -OAMP reporting could be improved – observation.	-Project environmental records on Stanmore website: https://stanmore.au/sustainability/reports/environmental-reports/#isaac-plans-complex , last retrieved 28 January 2026 -Letter: RE: Notification of Date of Commencement of the Action - Isaac Downs Project, 9 August 2021, Jon Romcke - Stanmore -Letter: Commencement of the Action - Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413), 10 August 2021, Thomas Long - DAWW -Email: FW: Notification of Commencement of the Action - Isaac Downs Project (SEC=OFFICIAL), 10 August 2021, Jon Romcke - Stanmore -Isaac Downs - Offset Area Management Plan: EPBC 2019/8413, Base Consulting Group Pty Ltd, ref J0053, Rev 03, 14 December 2021 -Offset area quarterly land manager reports for Mt Spencer – July 2022 to June 2025 -EPBC Act Annual Compliance Report 2023, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 4 November 2023, Revision: 2 - SLR Consulting Australia Pty Ltd -EPBC Act Annual Compliance Report 2024, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 5 November 2024, Revision: 1 - SLR Consulting Australia Pty Ltd -EPBC Act Annual Compliance Report 2025, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 3 November 2025, Revision: 1 - SLR Consulting Australia Pty Ltd	COMPLIANT & approval of the OAMP: COMPLIANT - The OAMP was developed and prepared to support the referral under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999. The OAMP was dated 14 December 2021 and implemented from that date, which is prior to the commencement of the action on 9 August 2022. 2. Implementation of the OAMP: COMPLIANT - The OAMP was implemented during the audit period. Initial habitat quality assessment was completed in July and October 2020, as summarised in Sections 4.1 and 4.2 of the OAMP. Quarterly land manager reports were provided for the Audit period which included notes on rainfall, stock rotation, and weed and pest management. Fence maintenance was not specifically referenced in these reports, however, it is understood to be a routine land management activity for Mt Spencer Station (the offset area). OBSERVATION - Review of Habitat Management Objectives for each of the EPBC Annual Reports for the Audit Period indicates alignment of management actions with the Habitat Management Objectives for each of the reporting years, although notes on fencing, clearing and some other routine management actions were not always indicated in the land manager's notes. 3. OAMP Reporting: OBSERVATION - The Auditor notes that some elements of the proposed annual reporting as outlined in Table 19 of the OAMP have not been implemented by Stanmore. For example, neither an Offset Area Report have been appended to the EPBC Annual Compliance Reports completed within the audit period, as indicated in Table 19. Further, evidence of an internal audit of OAMP implementation as outlined in Table 19 was not sighted during the audit. An improvement opportunity is identified for Stanmore to review and improve the OAMP reporting schedule to ensure timely completion of reports as required. RECOMMENDATIONS: 1.Improve the Offset Area Land Manager reporting for Mt Spencer offset management area to ensure that it includes prompts for reporting on land management actions and actions taken within the offset area that align with the OAMP habitat management objectives. Consider aligning this checklist with the reporting template for the Denham Park offset management area, as suggested in recommendation made at Condition 4. Include information such as clearing, fence maintenance, native flora and fauna management and habitat improvements, weed and pest maintenance, water management and water infrastructure improvements, land condition, vegetation management and pasture improvements, maintenance of buildings and structures, erosion control, road maintenance, for example. 2.Review and improve reporting against the schedule outlined in Table 19 of the OAMP to ensure timely completion of reports as required.	O - Observation	O - Observation
4	To compensate for the impacts to Ornamental Snake (<i>Denisonia maculata</i>) habitat up to the limits specified in condition 2.e, the approval holder must submit an Ornamental Snake Offset Area Management Plan (OS-OAMP), prepared by a suitably qualified ecologist and consistent with the Environmental offsets policy, within 12 months of the date of the commencement of the action for the written approval of the Minister. The approval holder must implement the approved OS-OAMP, and provide written evidence to the department, within 6 months of the approval of the OS-OAMP.	Confirm a suitably qualified ecologist prepared an OS-OAMP for the Ornamental Snake (<i>Denisonia maculata</i>) habitat offsets. Ensure it is consistent with the Environmental offsets policy. Confirm dates of the commencement of the action is within 12 months with written approval from the Minister.	-OS-OAMP approval -EPBC Annual Compliance Report 2023 – indicates compliance with Condition 4. -EPBC Annual Compliance Report 2024 - indicates non-compliance regarding ongoing implementation of the OS-OAMP for the reporting period, including: Year one habitat quality assessment (2023) inclusive of targeted ornamental snake survey could not be evidenced. Also, no Annual compliance report was evidenced. Improvement opportunity for implementation of land manager reports, preferably via a template, was also identified. -EPBC Annual Compliance Report 2025 – indicates partial non-compliance regarding ongoing implementation of the OS-OAMP due to lack of detail on land manager reporting template and reports, with cattle rotation records limited to 'yes' or 'no'. Recommendation was provided that improved reporting quantifying cattle numbers and dates of movements should be implemented to ensure the OS-OAMP is properly implemented. -Denham Park Improvements list provided by land manager (Pini Grazing) shows land management actions and improvements for the offset management area, dated between 20 February 2023 and 10 April 2025. Records improvements made to water infrastructure, land condition, vegetation management and pasture improvement, pest and weed eradication / management; house, sheds and yard facilities; erosion control and roads, fencing. -Written notification of OS-OAMP implementation – submitted to DCCEEW late and did not include baseline habitat assessment. -EPBC Offset Area Baseline Monitoring Report – satisfies	-Denham Park – Ornamental Snake Offset Area Management Plan: EPBC 2019/8413, Base Consulting Group Pty Ltd, ref J0053.3 Ornamental Snake Offsets, Rev 3, 20 March 2023 -Email: EPBC Approval 2019/8413 Commencement of OAMP (Ornamental Snake at Denham Park), Stanmore – Hardy Wincon, 3 Oct 2023 (email confirming implementation of the OS-OAMP) -RE: Request for a declared area on lot 23 on SP262530 - Isaac Regional Council (the property) - Offer of draft declaration; letter from Laura Smith, Department of Resources to Stanmore, 1 November 2023, including associated Request, draft Declaration, map and Draft Cover Letter. -Internal Stanmore emails indicating signature for acceptance and return of the above draft declaration - Email: FW: V/Dec Offer - Denham Park: Dept of Res Ref: 2023/002154, 2 November 2023, Hardy Wincon – Stanmore -Denham Park Land Manager Seasonal Checklist, August 2024 -Denham Park Land Manager Seasonal Checklist, September 2024 -Denham Park Land Manager Seasonal Checklist, August 2025 -Denham Park Improvements, Pini Grazing, undated -EPBC Offset Area Baseline Monitoring Report Isaac Downs Mine Offset Denham Park EPBC 2019/8413, Base Consulting Group Pty Ltd, Ref J0718, rev B, 20 August 2025 -Weed spraying report for spraying of <i>Harrisia cactus</i> : Offset Dronehab Denham Park 2024 Spraying - 4 Harrisia Cactus: 2024-04-17T19:4, AgLeader AgFiniti -Approval of Offset Area Management Plan for Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413); letter from DCCEEW to Stanmore, approving the Denham Park – Ornamental Snake Offset Area Management Plan (20 March 2023), dated 6 April 2023 -GIS and PTD records and information, as outlined at Condition 1, above. -Email: Stanmore IP South Pty Ltd EPBC 2019/8413 Reporting Non-Compliance with Condition 4, 4 November 2025, Belinda Parfitt - Stanmore	COMPLIANT & approval of the OS-OAMP: COMPLIANT - Review of the OS-OAMP indicates it was prepared by suitably qualified and experienced ecologists. CVs are provided in Appendix B of the OS-OAMP. Section 2.2 of the OS-OAMP provides an overview of the alignment between the OS-OAMP and the Environmental offsets policy. The approved OS-OAMP indicates a draft of the OS-OAMP was first provided to DCCEEW on 14 April 2022, which was within the required 12 months of issue of EPC 2019/8413 (24 March 2022). After various revisions and consultation with DCCEEW, the OS-OAMP was approved on 20 March 2023. 2. Implementation of the OS-OAMP: NOT COMPLIANT - Written notification of implementation of the OS-OAMP was provided to DCCEEW via email (3 Oct 2023), which was nine (9) days later than the required 6 months of its approval (i.e. before 20 September 2023). Evidence sighted. The Auditor notes non-compliance with Condition 4 was reported in the 2024 EPBC Annual Compliance Report related to implementation of the OS-OAMP for the reporting period, due to the Year one habitat quality assessment not having been completed. It is also noted that no Annual compliance report was evidenced, and an improvement opportunity for implementation of land manager reports, preferably via a template, was also identified. The baseline habitat assessment was completed on 20 August 2025, evidence sighted. The Auditor also notes a partial non-compliance was reported in the 2025 EPBC Annual Compliance Report related to implementation of the OS-OAMP for the reporting period. This was due to lack of detail on land manager records, with cattle rotation records limited to 'yes' or 'no'. Recommendation was provided that improved reporting quantifying cattle numbers and dates of movements should be implemented to ensure the OS-OAMP is properly implemented. On 4 November 2025, Stanmore provided a non-compliance notification to DCCEEW via email related to the administrative non-compliance with Condition 4. This notification was provided in alignment with requirements of Conditions 28 and 29. Given the above, non-compliance with Condition 4 of EPBC 2019/8413 is identified for this Audit Period, with respect to completion of actions required for implementation of the OS-OAMP. Given Stanmore have previously provided non-compliance notification to DCCEEW as outlined above, no further notification is considered necessary for in response to this audit for identified non-compliance against Condition 4. 3. OS-OAMP Reporting: OBSERVATION - The Auditor notes that some elements of the proposed annual reporting as outlined in Table 18 of the OS-OAMP have not been implemented by Stanmore. For example, neither an Offset Area Report nor the Ecological Condition Report (i.e. the Offset Area Baseline Monitoring Report, Base Group, 20 August 2025) have been appended to the EPBC Annual Compliance Reports completed within the audit period, as indicated in Table 19. Further, evidence of an internal audit of OS-OAMP implementation as outlined in Table 19 was not sighted during the audit. An improvement opportunity is identified for Stanmore to review and improve the OS-OAMP reporting schedule to ensure timely completion of reports as required. RECOMMENDATIONS: 1.Improve the Denham Park Land Manager Seasonal Checklist to ensure that it includes prompts to ensure that all required information is collected and noted in the report, such as provision of applicable details for cattle numbers and movements, for example. Consider aligning this checklist with the reporting template for the Mount Stanley offset management area, as suggested in recommendation made at Condition 4. 2.Review and improve reporting against the schedule outlined in Table 18 of the OS-OAMP to ensure timely completion of reports as required.	N - Non-compliance	N - Non-compliance
5	The approval holder must not impact more than 120 ha of Ornamental Snake (<i>Denisonia maculata</i>) habitat unless the OS-OAMP has been approved by the Minister in writing.	Confirm there is no more than 120ha of Ornamental Snake (<i>Denisonia maculata</i>) habitat disturbance through compliance reporting, seek evidence of keeping within the bounds of the OS-OAMP.	-OS-OAMP approval -EPBC Annual Compliance Reports – 2023, 2024 & 2025, indicating compliance with this condition. -GIS and PTD records and information, as outlined at Condition 1, above.	-Isaac Downs - Offset Area Management Plan: EPBC 2019/8413, Base Consulting Group Pty Ltd, ref J0053, Rev 03, 14 December 2021 -Denham Park – Ornamental Snake Offset Area Management Plan: EPBC 2019/8413, Base Consulting Group Pty Ltd, ref J0053.3 Ornamental Snake Offsets, Rev 3, 20 March 2023 -Approval of Offset Area Management Plan for Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413); letter from DCCEEW to Stanmore, approving the Denham Park – Ornamental Snake Offset Area Management Plan (20 March 2023), dated 6 April 2023 -GIS and PTD records and information, as outlined at Condition 1, above.	The OS-OAMP indicates that the maximum of 120 ha of Ornamental Snake habitat had been impacted up to the date of issue (at 20 March 2023) and that shapefiles of the impacted areas have been provided to DCCEEW by Stanmore. Given the OS-OAMP has since been approved, further disturbance of Ornamental Snake habitat up to the approved area is allowed provided this is in accordance with the conditions and specified in EPBC 2019/8413.	Y - Compliance	Y - Compliance
6	For every hectare of Ornamental Snake (<i>Denisonia maculata</i>) habitat impacted prior to approval of the OS-OAMP (i.e. prior clearance), the approval holder must provide an offset in addition to the offset for the total impact to Ornamental Snake (<i>Denisonia maculata</i>) habitat.	Check compliance reporting of habitat disturbance through the OS-OAMP, check against dates of approval. If habitat has been removed prior, evidence of the total additional habitat offset. (<173.5 ha + prior clearance)	-As above -Legal mechanisms securing required OS-OAMP offsets, as outlined for Conditions 10 to 12 below.	-Isaac Downs - Offset Area Management Plan: EPBC 2019/8413, Base Consulting Group Pty Ltd, ref J0053, Rev 03, 14 December 2021 -Denham Park – Ornamental Snake Offset Area Management Plan: EPBC 2019/8413 (20/03/2023) -Letter: Approval of Offset Area Management Plan for Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413), 6 April 2023, Kim Farrant - DCCEEW -Compliance records as outlined for Conditions 10 to 12 below.	This condition is compliant as the approved OS-OAMP outlines the 1,020 ha of offset area proposed to be secured at Denham Park. Stanmore have legally secured the required offsets, evidence and the legal mechanisms for which are outlined in compliance assessment against Conditions 10 to 12 below.	Y - Compliance	Y - Compliance
	Note: Condition 6 requires the area of habitat to be input into the impact calculator of the Offsets assessments guide to be the total area of habitat impacted plus prior clearance (<173.5 ha + prior clearance)		-Section 2.1.1.1 and section 4.3.2 of the OS-OAMP	-Denham Park - Ornamental Snake Offset Area Management Plan: EPBC 2019/8413 (20/03/2023)	Consideration of the total impact area requiring offsets is outlined in Section 2.2.2.2 of the OS-OAMP, and is calculated as 293.5 ha (i.e. the 120ha impacted prior to approval of the OS-OAMP plus 173.5 ha impact area). Section 4.3.2 of the OS-OAMP indicates that this 293.5 ha area has been considered in the EPBC Offset Area impact calculator attributes.	Y - Compliance	

EPBC Approval Condition Number	Compliance Requirement	Proposed Verification Method	Audit Evidence Considered	Documents Sighted	Determination	Compliance Finding - EPBC Approval Primary Conditions	Compliance Finding - EPBC Approval Sub-Conditions
OS-OAMP							
7	The approval holder must ensure the OS-OAMP required under condition 4 includes the following:		*Table 3 in section 2.1.1.2 of the OS-OAMP outlines compliance against Condition 7 requirements.	Denham Park - Ornamental Snake Offset Area Management Plan: EPBC 2019/8413 (20/03/2023)	Condition is compliant as the OS-OAMP was found to be prepared in accordance with the Department Environmental Management Guidelines.	Y - Compliance	Y - Compliance
7a	a. details to demonstrate how the offset(s) proposed compensates for the Impacts to Ornamental Snake (Denisonia maculata) habitat and any prior clearance in accordance with the Environmental offsets policy ;	a) Check the OS-OAMP details how the offset(s) compensates the impacts to the Ornamental Snake (Denisonia maculata) habitat plus any prior clearance in accordance with the Environmental offsets policy	Refer to section 4.3, 5.0 and 5.1 of OS-OAMP	As above	As above		Y - Compliance
7b	b. a description of the offset(s), including location, size, condition, environmental values present and surrounding land uses;	b) review the descriptions of the offsets within the OS-OAMP	Refer to section 4.3 of OS-OAMP	As above	As above		Y - Compliance
7c	c. relevant baseline data and other supporting evidence, including results from field validation surveys and quantifiable ecological data, that documents the presence or likely presence of the Ornamental Snake (Denisonia maculata) and the quality of the Ornamental Snake (Denisonia maculata) habitat within the offset area(s);	c) review relevant baseline data and supporting evidence from any field validation surveys, quantifiable ecological data, documentation of presence or likely presence of Ornamental Snake (Denisonia maculata) and the quality of the habitat within the offset areas.	Refer to section 3.2.1.5, 4.3 and Appendix D of OS-OAMP	As above	As above		Y - Compliance
7d	d. an assessment of the site habitat quality score(s) ;	d) conduct a site habitat quality score.	Refer to section 4.3 of OS-OAMP	As above	As above		Y - Compliance
7e	e. details of how the offset area(s) will provide connectivity with other habitats and biodiversity corridors and/or will contribute to a larger strategic offset for the Ornamental Snake (Denisonia maculata) ;	e) review and discuss how offset areas chosen will provide adequate connectivity with other habitats and biodiversity corridors. This needs to be consistent with the larger strategic offset for the Ornamental Snake (Denisonia maculata)	Refer to section 4.3 of OS-OAMP	As above	As above		Y - Compliance
7f	f. a description and maps (including shapefiles) to clearly define the location and boundaries of the offset area(s), accompanied by the offset attributes (including physical address of the offset area(s), coordinates of the boundary points in decimal degrees and the size of the environmental offsets in hectares);	f) review shapefiles of location and boundaries of the offset area(s) including the offset attributes, coordinates of boundary points in decimal degrees and the size of the environmental offsets in hectares.	Refer to section 4.3 of OS-OAMP	As above	As above		Y - Compliance
7g	g. specific offset completion criteria derived from the site habitat quality score to demonstrate the improvement in the habitat quality score for Ornamental Snake in the offset area(s) over the period of effect of this approval	g) compare the initial habitat quality score and determine if there has been improvement to the recent habitat quality score of the Ornamental Snake in the offset area(s) over the period of effect of this approval.	Refer to section 5.1 of OS-OAMP	As above	As above		Y - Compliance
7h	h. details of the management actions (including timing, frequency, duration and method of outcome measurement), to be carried out to meet the offset completion criteria (the management actions proposed must be consistent with the Environmental management plan guidelines and the approved conservation advice);	h) review management actions (including timing, frequency, duration and method of outcome measurement) and determine if it meets the offset completion criteria 9 (the management actions proposed must be consistent with the Environmental management plan guidelines and the approved conservation advice)	Refer to section 5.0 and 6.0 of OS-OAMP	As above	As above		Y - Compliance
7i	i. interim performance targets that set targets at 5-yearly intervals for expected progress towards the completion criteria set in condition 7.g;	i) review the interim performance targets for the 5 yearly intervals for expected progress towards the completion of habitat quality assessments in condition 7.g.	Refer to section 5.1 of OS-OAMP	As above	As above		Y - Compliance
7j	j. details of the nature, timing and frequency of monitoring to inform progress against achieving the interim performance targets (the frequency of monitoring must be sufficient to track progress towards each set of milestones, and sufficient to determine whether the offset area(s) is/are likely to achieve those milestones in adequate time to implement all necessary corrective actions);	j) review their monitoring processes, ensure is consistent with this condition.	Refer to section 5.1 of OS-OAMP	As above	As above		Y - Compliance
7k	k. timing for the implementation of corrective actions if monitoring activities indicate the interim performance targets have not been achieved;	k) review the timing of the corrective actions if interim performance targets are not being achieved.	Refer to section 7.0 of OS-OAMP	As above	As above		Y - Compliance
7l	l. a risk analysis and a risk management and mitigation strategy for all risks to the successful implementation of the OS-OAMP and timely achievement of the offset completion criteria, including for if the offset fails to achieve and maintain the completion criteria; and	l) review the risk analysis and risk management and mitigation strategy for all risks identified in the OS-OAMP	Refer to section 9.0 of OS-OAMP	As above	As above		Y - Compliance
7m	m. the legal mechanism that will be used for legally securing the offset area(s) , such that legal security remains in force over the offset area for at least the period of effect of this approval	m) review the legal mechanisms in place for legally securing the offset area(s).	Refer to section 4.6 of OS-OAMP	As above	As above		Y - Compliance
Offset Implementation Reporting							
8.1	Within 60 business days after the end of each 5 year period from the date of implementation of the OAMP , until the expiry of this approval, the approval holder must submit to the department , and publish on the website for the remainder of the period of the approval, a report that assesses progress towards achieving and maintaining the completion criteria specified in the OAMP and approved OS-OAMP . The report must:	Confirm they have published a report, and the report contains all the details listed in condition 8.a, 8.b, 8.c and 8.d	*OAMP *OS-OAMP & approval	*Isaac Downs - Offset Area Management Plan: EPBC 2019/8413, Base Consulting Group Pty Ltd, ref J0053, Rev 03, 14 December 2021 *Denham Park - Ornamental Snake Offset Area Management Plan: EPBC 2019/8413 (20/03/2023) *Letter: Approval of Offset Area Management Plan for Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413), 6 April 2023, Kim Farrant - DCCEEW	Condition is currently not triggered as the OAMP was implemented from 14 December 2021. This condition is triggered at once the 5 year period from the date of implementation of the OAMP has been reached. This date has been determined to be 15 December 2026.	NA - Not applicable	NA - Not applicable
8a	a. detail performance achieved against all interim performance targets in the period since the date of implementation with more detail in respect of the period since the last report;	As above	As above	As above	As above		NA - Not applicable
8b	b. describe the results and effectiveness of all management actions implemented during the period the subject of that report;	As above	As above	As above	As above		NA - Not applicable
8c	c. include all monitoring results, including all confirmed sightings of listed threatened species in a format consistent with the Guidelines for biological survey and mapped data ; and	As above	As above	As above	As above		NA - Not applicable
8d	d. detail any interim performance targets not met and describe all corrective actions taken and evaluate their effectiveness ;	As above	As above	As above	As above		NA - Not applicable
8.2	Once the completion criteria are achieved, they must be maintained by the approval holder for the remainder of the duration of this approval.	As above	As above	As above	As above		NA - Not applicable
9	Within 60 business days of the 20th anniversary of the date of implementation of the OAMP and the OS-OAMP , the approval holder must submit a report that provides evidence substantiating whether the offset area(s) has/has fully achieved and maintained the completion criteria. If all completion criteria have not been achieved within 20 years from the date of implementation of the OAMP and the OS-OAMP , the approval holder must provide, within 6 months, additional environmental offsets approved by the Minister in writing consistent with the Environmental offsets policy .	After the 20 year anniversary of the date of implementation of the OAMP a review of the report must be conducted, evidencing the compliance with this condition.	As above	As above	Condition is currently not triggered as the OAMP was implemented from 14 December 2021. The OS-OAMP was implemented from 6 April 2023. This condition is triggered at once the 20 year period from the date of implementation of the OAMP has been reached. This date has been determined to be 15 December 2041 for the OAMP and 6 April 2043 for the OS-OAMP.	NA - Not applicable	NA - Not applicable

EPBC Approval Condition Number	Compliance Requirement	Proposed Verification Method	Audit Evidence Considered	Documents Sighted	Determination	Compliance Finding - EPBC Approval Primary Conditions	Compliance Finding - EPBC Approval Sub-Conditions
Legal Securing of Environmental Offsets							
10	The approval holder must legally secure the offset area(s) described in the OAMP and approved OS-OAMP within 12 months of the approval of the associated plan. The OAMP and approved OS-OAMP must be attached to the legal mechanism used to legally secure the associated offset area(s).	Review proof of dates of the offset area(s) legally secured within the 12 months of the approval of the plan.	<ul style="list-style-type: none"> OAMP OS_OAMP & associated approval OAMP offsets - Vegetation Management Declaration has been made for the Denham Park offset area for the required OAMP offsets. A Titles search undertaken by Stanmore for the Mt Spencer offset area indicates that Vegetation Management Act Notices have been registered against the property title to secure the required offset area. OS-OAMP offsets - Vegetation Management Declaration has been made for the Denham Park offset area for the required OS-OAMP offsets. A Titles search undertaken by Stanmore for the Denham Park offset area indicates that Vegetation Management Act Notices have been registered against the property title to secure the required offset area. 	<p>OAMP OFFSETS:</p> <ul style="list-style-type: none"> Isaac Downs - Offset Area Management Plan: EPBC 2019/8413, Base Consulting Group Pty Ltd, ref J0053, Rev 03, 14 December 2021 Letter: Re: Declaration made on part of Lot 4 on SP277438 - Isaac Regional Council, 19 May 2022 from Sandra Wrayman, Department of Natural Resources to David William Wright (Stanmore Coal), and attached Notice of Declaration (2022/000638) ss19E - 19L of the Vegetation Management Act 1999; and attached Property Map of Assessable Vegetation PMAV 2022/000839 Titles Queensland Current Titles Search for Title reference 51023297 (including Lot 4 on SP277438), dated 10 December 2025 <p>OS-OAMP OFFSETS:</p> <ul style="list-style-type: none"> Denham Park - Ornamental Snake Offset Area Management Plan: EPBC 2019/8413 (20/03/2023) Letter: Approval of Offset Area Management Plan for Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413), 6 April 2023, Kim Farant - DCCEEW Letter: Request for a declared area on lot 23 on SP262530 - Isaac Regional Council (the property) - Offer of draft declaration, 1 November 2023, Laura Smith - Department of Resources Email: FW: V/Dec Offer - Denham Park: Dept of Res Ref: 2023/002154, 2 November 2023, Hardy Winčen - Stanmore Email: EPBC 2019/8413 Condition 11, from Hardy Winčen (Stanmore) to DCCEEW, 11 December 2023 including attached Declaration notice - approval Vegetation Management Act 1999 Sections 19E to 19G (20 June 2023); Property Map of 11 Assessable Vegetation PMAV 2023/002155; Voluntary Declaration Management Plan for the ID offset area within Lot 23 SP262530 (14/06/2023); and Voluntary Declaration Management Plan Reduced Part 2 Letter: RE: Declaration over part of lot 23 on SP262530 - Isaac Regional Council (the property) as an area of high nature conservation value, 30 November 2023, Laura Smith - Department of Resources. Including attachments: Declaration notice 2023/002154, Declared area map (DAM) 2023/002154, Property Map of Assessable Vegetation (PMAV) 2023/002155; Information notice about the decision to make PMAV 2023/002155; Voluntary Declaration Management Plan for the ID offset area within Lot 23 SP262530 Titles Queensland Current Titles Search for Title reference 51034554 (including Lot 23 on SP262530), dated 30 January 2026 	Available records indicate that OAMP offsets were secured for the Mt Spencer area by 20 May 2022, which is outside the Audit Period; however is noted to be within 12 months of issue of the EPBC approval and commencement of the action (9 August 2022). OS-OAMP offsets at Denham Park were secured by VMP Declaration on 30 November 2023, which is within 12 months of the OAMP approval (6 April 2023).	Y - Compliance	Y - Compliance
11	The approval holder must provide evidence to the department within 5 business days of the legal mechanism being executed.	Review the dates of submission, to determine if the client provided evidence to the department within the 5 business days.	As above	As above	OAMP offsets (Mt Spencer area) were secured prior to issue of the EPBC approval, and therefore provision of notification to the Minister for these offsets is outside this Audit Period (9 August 2022 to 31 January 2026). Notification of OS-OAMP offsets (Denham Park area) was emailed to DCCEEW on 11 December 2023, which was seven (7) business days following execution of the VMP Declaration (30 November 2023), therefore non-compliance with this condition is identified for the audit period. This administrative non-compliance was reported in the 2024 annual compliance report. According to the 2025 annual compliance report, this non-compliance was communicated to DCCEEW and is considered to have been addressed. Given this alongside the Auditor's observations of Stanmore's implementation of improved compliance management systems (Corly), no further action is considered warranted for this administrative, low-risk non-compliant finding.	N - Non-compliance	N - Non-compliance
12	The legal mechanism used to legally secure the offset area(s) described in the OAMP and approved OS-OAMP must remain in force from the date of obtaining legal security and for at least the remaining period of effect of this approval.	Determine if legal mechanism used to legally secure offset area(s) are in force from the date of obtaining legal security for the remainder of the period of approval in effect.	As above	As above	Current Title searches confirm the legal mechanisms remain in place for both the Mt Spencer and Denham Park offset areas.	Y - Compliance	Y - Compliance
Significant Species Management Plan							
13	The approval holder must implement the Significant Species Management Plan (SSMP) for the duration of mining activities.	Confirm and review documentation if approval holder has implemented a Significant Species Management Plan (SSMP) during mining activities.	<ul style="list-style-type: none"> PTD process and example permits - Part C of PTD includes SSMP considerations. SSMP EPBC Annual Compliance Reports - 2023, 2024 & 2025. Table 3 of Appendix A provides compliance review of SSMP implementation, indicating compliance for 2023, 3 Opportunities for Improvement for 2024, and 1 x Opportunity for Improvement for 2025 reporting year. Personnel interviews - outlining the PTD process, environmental monitoring and controls, fauna and flora clearance processes. Site visit observations of clearing areas and no-go areas marked onsite, operations within designated and marked areas. 	<ul style="list-style-type: none"> Isaac Downs - MNES Significant Species Management Plan: Stanmore IP South Pty Ltd, Base Consulting Group Pty Ltd, ref J0053, Rev 0, 12 March 2021 Permits to Disturb - 182, 2023-04-001, 184, 194, 195, 196v3, 198, 202, 205, 209, 210, 213, 214, 220v3, 221, 223 Isaac Downs EPBC 2019/8413 - Annual Habitat Reconciliation - 2025/014 EPBC ID Clearing bp.xlsx Permits to Disturb - Polygons - from 2017/10 to 2025/014.xlsx Stanmore Isaac Complex Operations Viewer - ESRI ArcGIS Viewer - Permit to disturb IPC-ENV-PRO-02.08.04 F_RM 001 Permit to Disturb - Permit 220v3 SIGNED.pdf and associated map - Isaac Downs - Disturbance Permit #220v3 - Highway Clearing - South 02.09.2025 EPBC Act Annual Compliance Report 2023, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 4 November 2023, Revision: 2, SLR Consulting Australia Pty Ltd EPBC Act Annual Compliance Report 2024, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 5 November 2024, Revision: 1, SLR Consulting Australia Pty Ltd EPBC Act Annual Compliance Report 2025, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 3 November 2025, Revision: 1, SLR Consulting Australia Pty Ltd 	Available compliance records and observations indicate that Stanmore have implemented the SSMP throughout the Audit Period and that the SSMP requirements are embedded into business-as-usual environmental risk control measures including Permit to Disturb processes. The detailed review of SSMP implementation completed on 3 November 2025 as part of the 2025 EPBC Compliance Reporting process is considered indicative of the status of SSMP implementation at the time of this Audit. Given this current Audit commenced with the 9 & 10 December 2025 site visit, a further detailed analysis has not been undertaken for this audit. Four minor opportunities for improvement were identified during the 2024 and 2025 EPBC compliance review processes, related to haul road speed limits, signage and training; mining contractor induction package to include reference to the EPBC MNES and site requirements (including weeds and pests, machinery washdown, roads & tracks significant fauna, etc.) to ensure compliance with SSMP requirements; and recommendation that more regular clean up of coal spillage at Billy's Gully Road be scheduled. It is noted that the 2025 OFI related to the mining contractor's induction package was a repeated opportunity identified in the 2024 report. It is understood from discussion with Stanmore personnel during the Audit that these OFIs are being addressed. For example, budget has been approved for installation of Wildlife Deterrent Guidelines (x2) for 2026; signage for Billy's Gully and Smoky Creek to remind drivers to slow down and weed inspections are implemented.	Y - Compliance	Y - Compliance
Conservation of the Koala and Greater Glider in the Bowen Basin							
14	The approval holder must contribute a single payment equivalent to the value of \$23,000 (GST exclusive and indexed in line with CPI on the date of this approval) to a program specified by the Minister in writing where the contribution will be used for the better protection and long-term conservation of the Koala (Phascolarctos cinereus) and Greater Glider (Petauraeus volans) in the Bowen Basin.	Check if approval holder has submitted \$23,000 (GST exclusive and indexed in line with CPI on the date of this approval) to a program specified by the Minister	<ul style="list-style-type: none"> Personnel interviews Stanmore internal email providing annual check confirming no payments have ever been made or requested under this requirement. EPBC Annual Compliance Reports - 2023, 2024 & 2025 indicating compliance for each of the reporting years relevant to this Audit period 	<ul style="list-style-type: none"> Email: RE: EPBC IPEE Approval 2019/8548 and ID 2019/8413 Koala and Greater Glider program, 14 October 2025, Belinda Parfitt - Stanmore EPBC Act Annual Compliance Report 2023, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 4 November 2023, Revision: 2, SLR Consulting Australia Pty Ltd EPBC Act Annual Compliance Report 2024, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 5 November 2024, Revision: 1, SLR Consulting Australia Pty Ltd EPBC Act Annual Compliance Report 2025, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 3 November 2025, Revision: 1, SLR Consulting Australia Pty Ltd 	Not triggered - The minister has never specified or requested a payment to be made. Included in the annual EPBC Compliance reports.	NA - Not applicable	NA - Not applicable
15	Within 3 months of the date the Minister specifies the program described in condition 14, the approval holder must provide notice to the department, with documentary evidence, that the payment required under condition 14 has been made.	If minister has specified determine a program, check the dates of approval holder has provided evidence of payment to the department within the 3 months	As above	As above	As above	NA - Not applicable	NA - Not applicable
Groundwater Dependent Ecosystems (GDEs)							
16	The approval holder must implement the GDE Management and Monitoring Plan for at least the duration of this approval.	Check and review the GDE Management and Monitoring Plan (GDEMMP)	<ul style="list-style-type: none"> GDEMMP issue (21 April 2021). Evidence of GDEMMP implementation via baseline assessment & review report and monitoring report. EPBC Annual Compliance Reports - 2023, 2024 & 2025 indicating compliance for each of the reporting years. 	<ul style="list-style-type: none"> GDEMMP - Groundwater Dependent Ecosystem (GDE) Management and Monitoring Plan, Isaac Downs Project, 14 April 2021 (Revised following DAWE review), David Stanton - 3d Environmental Groundwater Dependent Ecosystem Monitoring and Management Plan - Isaac Downs Mine - Baseline Assessment: Baseline Data Review and Phase 2, GDEMMP_Rev 2 (March 2023), revision 2, 18 March 2023, 3d Environmental Groundwater Dependent Ecosystem Monitoring and Management Plan - Isaac Downs Mine, Monitoring Report for: Event 2, Phase 2 Monitoring, November 2024, Initial V1_Report, 23 March 2025, David Stanton - Watermark Eco EPBC Act Annual Compliance Report 2023, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 4 November 2023, Revision: 2, SLR Consulting Australia Pty Ltd EPBC Act Annual Compliance Report 2024, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 5 November 2024, Revision: 1, SLR Consulting Australia Pty Ltd EPBC Act Annual Compliance Report 2025, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 3 November 2025, Revision: 1, SLR Consulting Australia Pty Ltd 	The GDEMMP was finalised on 21 April 2021, which is prior to commencement of the current Audit Period (9 August 2022). During the Audit Period, the GDEMMP has been implemented for the Project, as evidenced by completion of GDEMMP baseline assessment and baseline data review report (March 2023); and GDEMMP Monitoring Report for: Event 2, Phase 2 Monitoring (23 March 2025). Compliance observations are supported by EPBC Annual Reporting observations for the Audit Period, indicating compliance against this condition.	Y - Compliance	Y - Compliance
17	The approval holder must submit a revised GDE Management and Monitoring Plan (GDEMMP) for the written approval of the Minister within 2.5 years from the date of this approval. The revised GDEMMP must be adjusted to include the raw baseline data and to set the trigger values and disturbance thresholds. The approval holder must implement the revised GDEMMP as approved by the Minister within 12 months of submitting to the Minister.	Confirm approval holder has submitted a revised GDEMMP for written approval of the minister within 2.5 years from date of approval. Confirm the revised GDEMMP contains raw baseline data and to set the trigger values and disturbance thresholds. The approval holder must implement the revised GDEMMP within 12 months of submission.	<ul style="list-style-type: none"> EPBC 2019/8413 (issued 24 March 2022) Revised GDEMMP issued 18 March 2023 Email submission of GDEMMP to DCCEEW (12 March 2025). EPBC Annual Compliance Reports - 2023, 2024 & 2025 indicating non-compliance for 2024 and qualified compliance for 2025 reporting years. Stanmore email submitting revised GDEMMP to DCCEEW (12 March 2025). GDEMMP monitoring event and report (November 2024, report issued 23 March 2025). 	<ul style="list-style-type: none"> Variation of Conditions Attached to Approval, Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413) Groundwater Dependent Ecosystem Monitoring and Management Plan - Isaac Downs Mine - Baseline Assessment: Baseline Data Review and Phase 2, GDEMMP_Rev 2 (March 2023), revision 2, 18 March 2023, 3d Environmental Email: Stanmore Resources Isaac Downs Mine EPBC 2019/8413 Revised GDE Monitoring Program, 12 March 2025, Ken Dunlop (Stanmore), submitting copy of March 2023 revised GDEMMP to DCCEEW EPBC monitoring inbox. Groundwater Dependent Ecosystem Monitoring and Management Plan - Isaac Downs Mine, Monitoring Report for: Event 2, Phase 2 Monitoring, November 2024, Initial V1_Report, 23 March 2025, David Stanton - Watermark Eco EPBC Act Annual Compliance Report 2023, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 4 November 2023, Revision: 2, SLR Consulting Australia Pty Ltd EPBC Act Annual Compliance Report 2024, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 5 November 2024, Revision: 1, SLR Consulting Australia Pty Ltd EPBC Act Annual Compliance Report 2025, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 3 November 2025, Revision: 1, SLR Consulting Australia Pty Ltd 	The Approval was issued on 24 March 2022, therefore the revised GDEMMP was required to be submitted to DCCEEW by 24 September 2024. A revised GDEMMP was finalised as the Baseline Assessment: Baseline Data Review and Phase 2, GDEMMP, finalised on 18 March 2023. At the time of the audit, no records confirming submission of this report to DCCEEW within the required 2.5 years from issue of EPBC 2019/8413 (i.e. by 24 September 2024) were available for review. It is noted that a non-compliance against this part of Condition 17 was raised in the 2024 EPBC Annual Compliance Report. The matter was addressed as a "Compliance (qualified)" finding in the 2025 EPBC Annual Compliance Report, on the basis that the previous Non-Compliance had been addressed through subsequent provision of the updated GDEMMP to DCCEEW (via email from Ken Dunlop to DCCEEW, 12 March 2025). Given the above, non-compliance against this Condition is identified for the Audit period, The Auditor acknowledges that the updated GDEMMP has since been provided to DCCEEW, which addresses the material requirement that an updated GDEMMP be prepared and provided to the Department. Evidence of GDEMMP implementation within 12 months of submission to DCCEEW is indicated by completion of the November 2024 Monitoring Report for: Event 2, Phase 2 Monitoring. It is noted that at the time of the audit, evidence indicating DCCEEW's approval of the revised GDEMMP was not available for the Auditor's review.	N - Non-compliance	N - Non-compliance
RECOMMENDATION: Continue implementing compliance management and monitoring processes to ensure timely development and provision of compliance information is undertaken, and that records are retained for review.							
18	If the approval holder detects that a trigger value has been reached or exceeded, the approval holder must report this to the department within 5 business days of the detection. Unless evidence can be provided, to the Minister's satisfaction, that the trigger value exceedance is not attributable to mining activities, corrective actions must be implemented within 60 business days of the detection.	Determine if the trigger value has been reached or exceeded and what documentation has been submitted and within 5 business days of detection. Confirm when corrective actions were implemented (needs to be within 60 business days).	Review of monitoring results against trigger values.	<ul style="list-style-type: none"> Groundwater Dependent Ecosystem Monitoring and Management Plan - Isaac Downs Mine - Baseline Assessment: Baseline Data Review and Phase 2, GDEMMP_Rev 2 (March 2023), revision 2, 18 March 2023, 3d Environmental Groundwater Dependent Ecosystem Monitoring and Management Plan - Isaac Downs Mine, Monitoring Report for: Event 2, Phase 2 Monitoring, November 2024, Initial V1_Report, 23 March 2025, David Stanton - Watermark Eco 	Review of available reports indicated that the GDEMMP trigger values were not breached for either the March 2023 or November 2024 GDEMMP monitoring events.	NA - Not applicable	NA - Not applicable
19	If corrective actions fail to halt or reverse impacts to GDEs within 24 months from the detection of a trigger level being reached or exceeded, and a disturbance threshold has been exceeded, the approval holder must submit a GDE Offset Strategy within 6 months for the written approval of the Minister. The approval holder must implement the approved GDE Offset Strategy within 12 months of submitting to the Minister.	If threshold is hit confirm the approval holder has submitted a GDE Offset Strategy (GDEOS) within 6 months with written approval from the Minister. Confirm the approved GDEOS has been implemented within 12 months of submission.	As above	As above	Not triggered, based on review of results as outlined at Condition 18, above.	NA - Not applicable	NA - Not applicable
20	Provided no trigger value has been reached or exceeded under condition 18, resulting in the requirement for a GDE Offset Strategy under condition 19, the approval holder must, within 6 months of completing follow-up surveys, submit a report to the Minister that provides:	As above	As above	As above	As above	NA - Not applicable	NA - Not applicable
20a	a. a summary memorandum detailing the current habitat quality score of the GDEs;	a) Review follow-up surveys, and submission reports to the minister provides a current habitat quality score of the GDEs.	As above	As above	As above	NA - Not applicable	NA - Not applicable
20b	b. a comparison of the follow-up surveys to the baseline GDE dataset provided in the approved revised GDEMMP, to identify any significant departure from the habitat quality score and/or extent of GDEs when compared to these metrics prior to the commencement of the action; and	b) review the comparison of the follow up surveys against baseline GDE dataset provided in the approved revised GDEMMP.	As above	As above	As above	NA - Not applicable	NA - Not applicable
20c	c. commitments to any future monitoring requirements.	c) review what the commitments to future monitoring entail.	As above	As above	As above	NA - Not applicable	NA - Not applicable

EPBC Approval Condition Number	Compliance Requirement	Proposed Verification Method	Audit Evidence Considered	Documents Sighted	Determination	Compliance Finding - EPBC Approval Primary Conditions	Compliance Finding - EPBC Approval Sub-Conditions
Part B - Standard administrative conditions							
Notification of Date of Commencement of the Action							
21	The approval holder must notify the department in writing of the date of commencement of the action within 10 business days after the date of the commencement of the action.	Confirm dates of notice to the department for the commencement of action was submitted within 10 business days.	•EPBC 2019/8413 •Correspondence indicating commencement of the action.	•Variation of Conditions Attached to Approval, Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413) •Letter: RE: Notification of Date of Commencement of the Action - Isaac Downs Project, 9 August 2021, Jon Romcke - Stanmore •Letter: Commencement of the Action - Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413), 10 August 2021, Thomas Long - DAWE •Email: FW: Notification of Commencement of the Action - Isaac Downs Project [SEC=OFFICIAL], 10 August 2021, Jon Romcke - Stanmore	The action commenced on 9 August 2022 and was notified in writing to DCCEEW the same day.	Y - Compliance	Y - Compliance
22	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.	Confirm dates of commencement. If the approval holder did not commence within 5 years, then the approval holder needs to provide evidence of correspondence with the Minister and not commence without that agreement.	As above	As above	Not triggered as action was commenced within 5 years of the approval.	NA - Not applicable	NA - Not applicable
Compliance Records							
23	The approval holder must maintain accurate and complete compliance records.	Review all documentation of compliance records and review accuracy and completeness	•Compliance records as referenced in this Audit report. •Personnel interviews – outlining current compliance management system arrangements, planned improvements and further opportunities for improvement.	•Compliance records as referenced in this Audit report.	During the Audit, compliance records were generally and readily available for review on request by the Auditor. A wide range of compliance records have been made available for the Auditor's review, including project approvals, management plans, compliance correspondence (letters, emails), monitoring and incident reports, etc. The Project's compliance records were observed to be accurate and completed adequately. For example, PTDs and environmental reports sighted during the audit were noted to have been adequately and accurately completed. In addition, evidence indicating routine technical and quality review being undertaken across the range of compliance records, reports and associated data by Stanmore site, corporate, and specialist personnel including legal, environmental, operations, management representatives as relevant to the documentation. An internal data loss incident report (Post Data Loss Incident Report (24/06/24) for an event that occurred on 28 May 2024 was reviewed by the compliance assessor as part of the compliance assessment for the 2024 EPBC Annual Compliance Report. The Auditor understands that spatial files, permits, and email communication was able to be restored for all PTDs impacted in the audit period. It is noted that the lost data was restored to the extent practicable and corrective actions implemented to prevent recurrence. Therefore, this event is not considered to be material with respect to an assessment of overall compliance with Condition 23 for the current Audit Period. These observations support the Auditor's opinion that overall, Stanmore are compliant with Condition 23 for this Audit period. OBSERVATIONS: During the Audit it was noted that access to historic records is held across a combination of Stanmore and contracted Coal Mine Operator (CMO) project team records, personal emails, corporate & personal file drives. Discussion with Stanmore personnel acknowledged the difficulties associated with this, for example following changes in personnel or contractor arrangements. Stanmore personnel indicated that Stanmore have implemented an upgraded compliance management system (Corly) which is in use to identify, manage and track compliance management actions and records; and advised that this system is generally being used to attach compliance records to action items. Stanmore personnel noted further improvements and developments have been identified and are to be implemented over time for the Corly system, including for example, improving Corly performance for managing large file attachments, improving use of Corly as environmental incident register, and further improvements towards capturing and organising compliance records within the database. Stanmore personnel noted that currently only high potential environmental incidents are included in Corly. An onsite incident management system is currently managed by the contractor CMO, however from 15th December 2025, this will be discontinued when the CMO will change from the contractor to Stanmore. From 15th December, the Corly system to take over as the main environmental incident register for the Isaac Downs Project and therefore will become the 'single source of truth' for environmental compliance records, incident and non-compliance reporting. RECOMMENDATION: Continue implementing and improving compliance and incident management and monitoring processes to ensure timely development and provision of compliance information is undertaken, and that records are retained for review.	O - Observation	O - Observation
24	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.	For any requests from the department, approval holder must provide an electronic copy within their compliance records to review.	•DCCEEW compliance correspondence applicable to the Audit period. •EPBC Annual Compliance Reports – 2023, 2024 & 2025 – indicating no written requests received from DCCEEW during the Audit Period. •Personnel interviews – indicating no written requests received from DCCEEW during the Audit Period.	•Email: Stanmore Resources Isaac Downs EPBC 2019/8413 Annual Compliance Report, Attachment 626.30163 IDM EPBC Compliance 2023 Final_Optimized.pdf, 2 November 2023, Belinda Parfitt - Stanmore •Email: Stanmore Resources - Isaac Downs EPBC 2019/8413 Annual Compliance Report, Attachment 626.030235 IDM EPBC Compliance 2024 for Issue.pdf, 5 November 2024, Belinda Parfitt - Stanmore •Email: Stanmore Resources - Isaac Downs EPBC 2019/8413 Annual Compliance Report, Attachment 626.030321 IDM EPBC Compliance 2025 FOR ISSUE.pdf, 4 November 2025, Belinda Parfitt - Stanmore •Letter: RE: Isaac Downs Coal Mine - 7 November 2022; Notification to DCCEEW, 23 November 2022, Paddy Kearney - Stanmore •Letter: Incident Report following non-compliance with conditions - Isaac Downs Project, EPBC 2019/8413, 16 November 2023, Dave Adams - Stanmore •Letter: Warning Letter - Contravention of Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) approval for Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413), 21 March 2024, Karina Richards – DCCEEW •EPBC Act Annual Compliance Report 2023, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 4 November 2023, Revision: 2, SLR Consulting Australia Pty Ltd •EPBC Act Annual Compliance Report 2024, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 5 November 2024, Revision: 1, SLR Consulting Australia Pty Ltd •EPBC Act Annual Compliance Report 2025, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 3 November 2025, Revision: 1, SLR Consulting Australia Pty Ltd	Not triggered. Based on available information and advice from Stanmore personnel, DCCEEW have not made any written requests for electronic copies of compliance records during the Audit Period.	Y - Compliance	Y - Compliance
	Note: Compliance records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the department's website or through the general media.	Any Department compliance audit reports, results and associated correspondence with the Department.	N/A	N/A	N/A		Note only
Submission and Publication of Plans							
25	The approval holder must:					N - Non-compliance	
25a	a. submit plans electronically to the department;	Review all plans electronically submitted to the department was within 20 business days (Unless agreed otherwise by the minister).	•Review of Stanmore website (9 & 10 October 2025; 28 January 2026), showing management plans and reports available for Isaac Downs EPBC and associated upload dates. •OS-OAMP approval. •EPBC annual compliance reports, indicating non-compliance with Condition 25 for each of the 2023, 2024 and 2025 reporting years. •Non-compliance correspondence including DCCEEW Warning Letter regarding identified non-compliance with Condition 25 during the Audit Period. •Personnel interviews	•Project environmental management plans and reports on Stanmore website: https://stanmore.au/sustainability/reports/environmental-reports/#isaac-plains-complex , last retrieved 28 January 2026. Showing EPBC-related management plans available for Isaac Downs EPBC and associated upload dates. •Environmental Offset Area Management Plan for Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413); letter from DCCEEW to Stanmore, approving the Denham Park - Ornamental Snake Offset Area Management Plan (20 March 2023); dated 6 April 2023 •EPBC Act Annual Compliance Report 2023, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 4 November 2023, Revision: 2, SLR Consulting Australia Pty Ltd •EPBC Act Annual Compliance Report 2024, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 5 November 2024, Revision: 1, SLR Consulting Australia Pty Ltd •EPBC Act Annual Compliance Report 2025, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 3 November 2025, Revision: 1, SLR Consulting Australia Pty Ltd •Email: Stanmore Resources Isaac Downs EPBC 2019/8413 Annual Compliance Report, Attachment 626.30163 IDM EPBC Compliance 2023 Final_Optimized.pdf, 2 November 2023, Belinda Parfitt - Stanmore •Email: Stanmore Resources - Isaac Downs EPBC 2019/8413 Annual Compliance Report, Attachment 626.030235 IDM EPBC Compliance 2024 for Issue.pdf, 5 November 2024, Belinda Parfitt - Stanmore •Email: Stanmore Resources - Isaac Downs EPBC 2019/8413 Annual Compliance Report, Attachment 626.030321 IDM EPBC Compliance 2025 FOR ISSUE.pdf, 4 November 2025, Belinda Parfitt - Stanmore •Letter: RE: Isaac Downs Coal Mine - 7 November 2022; Notification to DCCEEW, 23 November 2022, Paddy Kearney - Stanmore •Email: Stanmore Resources Isaac Downs EPBC 2019/8413 Uploaded to Website SSMP and GDEMMP, 16 November 2023, Belinda Parfitt - Stanmore (1 of 2 emails) •Email: Stanmore Resources Isaac Downs EPBC 2019/8413 Uploaded to Website SSMP and GDEMMP, 16 November 2023, Belinda Parfitt - Stanmore (2 of 2 emails) •Letter: Incident Report following non-compliance with conditions - Isaac Downs Project, EPBC 2019/8413, 16 November 2023, Dave Adams - Stanmore •Letter: Warning Letter - Contravention of Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) approval for Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413), 21 March 2024, Karina Richards – DCCEEW •Email: FW: Environmental Reports on Website Urgent updates required, 2 February 2026, Belinda Parfitt - Stanmore	As per the Approval (EPBC 2019/8413) relevant plans include: • OAMP (Finalised 14 December 2021; uploaded 21 December 2021) • OS-OAMP (Approved 06 April 2023; uploaded 29 June 2023) • SSMMP (Finalised 12 March 2021; uploaded 25 October 2022) • GDEMMP (Submitted 12 March 2025; uploaded 25 October 2022) The 2023 EPBC annual compliance report identified non-compliance with Condition 25 due to: • The OS-OAMP having been uploaded to the Stanmore Website on the 29 June 2023, outside of the required 20 business days; and • The SSMMP and GDEMMP were not located on the Stanmore website. Stanmore notified DCCEEW of the above non-compliances in email dated 16 November 2023, and investigation report dated 23 November 2023. On 21 March 2024, DCCEEW issued a Warning Letter to Stanmore related to the non-compliance, the content of which also notes that the matter is finalised. Further incidences of non-compliance with elements of Condition 25 are identified and were reported in the 2024 & 2025 annual compliance reviews as follows: • Data loss incident that occurred on 28 May 2024, that resulted in temporary loss of data from the Stanmore website (identified in the 2024 annual compliance report); and • The SSMMP and GDEMMP were not located on the Stanmore website during the 2024 & 2025 annual compliance reviews, despite evidence having previously been showing this had been corrected as of 16 November 2023. The documents were not present on 16 October 2024 during the 2024 EPBC compliance review, nor on 1 October 2025 during the 2025 review. It is noted that both documents were present on the website during the audit site visit (9 & 10 December 2025), and again during audit compliance verification activities (28 January 2026). Advice provided by Stanmore personnel (pers. Comm. Belinda Parfitt) indicated that, contrary to reporting provided in the 2025 annual compliance report, the data loss incident of 28 May 2024 did not impact required plans and records published to the Project website. A website upgrade in late 2023 is understood to have temporarily impacted the availability of some reports. On 31 October 2025, Stanmore provided a non-compliance notification for the 2025 annual compliance review observation to DCCEEW via email. It is noted that this notification was provided prior to Stanmore being formally made aware of the non-compliance (on issue of the report dated 4 Nov 2025). Therefore, it is deemed that this notification was provided in alignment with requirements of Conditions 28 and 29. The Auditor notes that non-compliance related to the 2023 Annual reporting period have previously been closed out by DCCEEW via issue of Warning Letter (21 March 2024). It is also noted that DCCEEW have not required further action regarding matters raised / notified in response to the 2024 & 2025 annual compliance reports. During audit considerations, Stanmore personnel reported that on 15 December 2025, a corporate website upgrade resulted in the Isaac Downs SSMP, GDEMMP and 2025 Annual EPBC environmental compliance report being removed from the website. These reports were reinstated on 24 December 2025 with request the environmental personnel be included as stakeholders in any future updates to the corporate website information to prevent recurrence of data loss. Notification and reporting required by Conditions 28 & 29 has not been provided for this incident to date, however Stanmore personnel indicated this would be undertaken following submission of this audit report, pending consultation with DCCEEW regarding notifications and reporting for administrative matters raised in annual and audit compliance reports, as outlined below. Given the above, non-compliance with Condition 25 is identified for this audit period, although it is noted that these matters are administrative and low risk in nature. The Auditor notes that at the time of this EPBC Compliance Audit, all required plans were available for download from the Project website. Each of the required plans was accessed by the Auditor during the site visit (9 & 10 December 2025), and again during audit compliance verification activities (28 January 2026). RECOMMENDATION: Consult with DCCEEW regarding protocols for provision of separate notification and reporting for administrative non-compliances identified in annual and audit reports. If necessary, formalise notification and reporting to DCCEEW for the administrative non-compliance identified following Stanmore's 14 December 2025 website update and temporary removal of required reports from the Project website. Ensure notification and reporting aligns with requirements of Conditions 28 and 29.	N - Non-compliance	N - Non-compliance
25b	b. unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of the date of approval.	As above	As above	As above	As outlined at Condition 25.a), not all required information was available on the Project website within 20 business days as required by Condition 25.b). Refer above for compliance considerations and recommended outcomes.	N - Non-compliance	N - Non-compliance
25b(i)	i. this approval, if the approved version of the plan is specified in these conditions;	As above	As above	As above	As outlined at Condition 25.a), not all required information was available on the Project website within 20 business days as required by Condition 25.b.i). Refer above for compliance considerations and recommended outcomes.	N - Non-compliance	N - Non-compliance
25b(ii)	ii. the date a plan has been approved by the Minister in writing, if the plan requires the approval of the Minister;	As above	As above	As above	As outlined at Condition 25.a), not all required information was available on the Project website within 20 business days as required by Condition 25.b.ii). Refer above for compliance considerations and recommended outcomes.	N - Non-compliance	N - Non-compliance
25c	c. exclude or redact sensitive ecological data or commercial or personal data from plans published on the website or provided to a member of the public; and	Ensure there is exclusion and redaction of sensitive information of ecological data or commercial, personal data.	As above	As above	Not triggered as no sensitive ecological data or commercial or personal data was excluded or redacted from plans published on the website or provided to the public.	NA - Not applicable	NA - Not applicable
25d	d. keep plans published on the website until the end date of this approval.	Determine if the plans are kept on the website until end date of approval.	As above	As above	As outlined at Condition 25.a), not all required information was available on the Project website for the duration of the Audit period as required by Condition 25.d. Refer above for compliance considerations and recommended outcomes.	N - Non-compliance	N - Non-compliance
26	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under all plans is prepared in accordance with the Guidelines for biological survey and mapped data, or subsequent revision, and submitted electronically to the department in accordance with the requirements of those plans.	Ensure approval holder's monitoring data complies with the Guidelines for biological survey and mapped data, subsequent revision and submitted to the department	•Ecological and groundwater monitoring data and reports as outlined in this Audit.	•Ecological and groundwater monitoring data and reports as outlined in this Audit.	Based on information reviewed during this audit, the Auditor considers that monitoring data prepared for the project including for the OAMP, OS-OAMP and GDEMMP are prepared in general accordance with relevant guidelines applicable to those ecological and groundwater datasets, and in general accordance with requirements of Condition 26. The GDEMMP was updated during the Audit Period and provided to DCCEEW. None of the other plans have required submission to the Department during the Audit Period. All required plans have been approved and assessed as compliant during previous reviews. OBSERVATION: While it is noted that they generally align with the required guidelines and Condition 25, it is noted that current ecological and groundwater monitoring reports do not include explicit reference to the current version of Guidelines for biological survey and mapped data (Revised 16 August 2018). RECOMMENDATION: Update project specifications and scope of works for preparation of monitoring data that is intended to support compliance against EPBC 2019/8413 to include requirements that the monitoring data aligns with Condition 25 of EPBC 2019/8413, specifically that it is prepared so that it: 1. Aligns with, and includes reference to the current version of Guidelines for biological survey and mapped data (Revised 16 August 2018); and 2. Is provided electronically in a format that aligns with requirements of the relevant plans and that is suitable for submission to DCCEEW.	O - Observation	O - Observation
Annual Compliance Reporting							
27	The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:	Confirm and review the annual compliance report was conducted and completed within 12 months following the date of commencement of the action or different date agreed to with the Minister	•Stanmore Project website: https://stanmore.au/sustainability/reports/environmental-reports/#isaac-plains-complex , last retrieved 28 January 2026. Showing EPBC-related reports available for Isaac Downs EPBC and associated upload dates. •EPBC Annual compliance reports – 2022, 2023, 2024 & 2025. •Timeanddate - Business Date Calculator: Business Days from Today or Any Date:				

EPBC Approval Condition Number	Compliance Requirement	Proposed Verification Method	Audit Evidence Considered	Documents Sighted	Determination	Compliance Finding - EPBC Approval Primary Conditions	Compliance Finding - EPBC Approval Sub-Conditions
27b	b. notify the department by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication;	Confirm the Department was notified of publication within five business days of the date of publication.	As above	+Email: Stanmore Resources - Isaac Downs Mine EPBC 2019/8413 Annual Compliance Report, 4 November 2025, Belinda Parfitt - Stanmore +Email: Stanmore Resources - Isaac Downs Mine EPBC 2019/8413 Annual Compliance Report, 5 November 2024, Belinda Parfitt - Stanmore +Email: Stanmore Resources - Isaac Downs Mine EPBC 2019/8413 Annual Compliance Report, 2 November 2023, Belinda Parfitt - Stanmore +Email: Stanmore Resources - Isaac Downs Mine EPBC 2019/8413 Annual Compliance Report, 2 November 2023, Belinda Parfitt - Stanmore +Email: RE: Stanmore Resources Limited EPBC 2019/8413 Annual Compliance Report, 7 November 2022, Danie Mude, Stanmore	Emails notifying DCCEEW sighted for each reporting period. It is noted that the 2022 Annual Compliance Report was revised on 8 November 2022. The revised report has replaced the initial version on the Stanmore website. Given the report was provided to DCCEEW via weblink to the Project website version, given the timing and current availability of the updated report for the purposes of this Audit, DCCEEW are deemed to have received the revised version of the report.		Y - Compliance
27c	c. keep all compliance reports publicly available on the website until this approval expires;	Confirm the reports are publicly available until the approval expires	As above	As above	Review of available records indicates all required EPBC compliance reports have been available on the project website since their date of upload.		Y - Compliance
27d	d. exclude or redact sensitive ecological data or commercial or personal data from compliance reports published on the website, and	Exclusion and redaction of ecological or sensitive information have been completed on all published reports	As above	As above	Not triggered as no sensitive ecological data or commercial or personal data was excluded or redacted from plans published on the website or provided to the public.		NA - Not applicable
27e	e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the department within 5 business days of publication.	In the event of redaction, a full compliance report has been submitted to the department within 5 business days.	As above	As above	As above		NA - Not applicable
	Note: Compliance reports may be published on the department's website	n/a	n/a	n/a	n/a		Note only
Reporting Non-compliances							
28	The approval holder must notify the department in writing of any incident, non-compliance with the conditions, or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify:	Any incidents or non-compliance with the conditions and have been notified to the department within two business days after awareness of the incident and non-compliance.	+Non-compliance correspondence including DCCEEW Warning Letters, notifications, reports and other correspondence regarding identified non-compliances with Condition 28 during the Audit Period. +Personnel interviews – outlining circumstances and corrective actions associated with the non-compliance events. +Site visit observations of compliance management system integration and use within Stanmore business-as-usual environmental compliance management processes. +Personnel interviews	+Letter: RE: Isaac Downs Coal Mine - 7 November 2022; Notification to DCCEEW, 23 November 2022, Paddy Kearney - Stanmore +Letter: Warning Letter - Contravention of Environment Protection and Biodiversity Conservation Act 1999 for EPBC 2019/8413, 14 March 2023, Thomas Long - DCCEEW +Email: Stanmore Resources - Isaac Downs EPBC 2019/8413 Non-compliance with conditions, 3 November 2023, Belinda Parfitt - Stanmore +Email: RE: Stanmore Resources Isaac Downs EPBC 2019/8413 Non-compliance with conditions [SEC-OFFICIAL], 16 November 2023, Belinda Parfitt - Stanmore +Letter: Incident Report following non-compliance with conditions - Isaac Downs Project, EPBC 2019/8413, 16 November 2023, Dave Adams - Stanmore +Letter: Warning Letter - Contravention of Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) approval for Isaac Downs Project, near Moranbah, Queensland (EPBC 2019/8413), 21 March 2024, Karina Richards - DCCEEW +Isaac Downs EPBC Compliance Report Isaac Downs Coal Mine EPBC 2019/8413, 2 November 2022, as revised 8 November 2022, SGM Environmental Pty Ltd +EPBC Act Annual Compliance Report 2023, Isaac Downs - EPBC Act Referral 2019/8413, SLR Project No.: 626.030163.00001, 4 November 2023, Revision: 2, SLR Consulting Australia Pty Ltd	During the Audit Period, Stanmore provided written notification to DCCEEW of four non-compliances against EPBC 2019/8413 conditions as follows: +7 November 2022 – The 2022 Annual EPBC Compliance Report (issued to Stanmore on 2 November 2022) identified disturbance had occurred outside the approved Project footprint, contributing to non-compliance against Condition 1 of the EPBC Approval. While it is noted that the actions contributing to this non-compliance with Condition 1 occurred before March 2022, and therefore occurred prior to the audit period, subsequent notifications and reporting actions contributing to substantiated non-compliance against Conditions 28 and 29 were undertaken from 7 November, which is within the current Audit Period and therefore are relevant to this Audit. +3 November 2023 – An administrative non-compliance with conditions 28 and 29 was identified in the 2023 annual compliance report, which related to formally notifying the Department of a non-compliance which was included in the previous (2021/2022) compliance report. Email notification of this incident was provided on 4 November 2023, with a formal report provided via letter dated 16 November 2023. +31 October 2025 - An administrative non-compliance with Condition 25 was notified to DCCEEW following the 2025 EPBC Annual Compliance Report related to availability of the SSMP and GDEMMP on the Project website. This notification addressed requirements of Condition 27 and 28. It is noted that this notification was provided prior to Stanmore being formally made aware of the non-compliance (on issue of the report dated 4 Nov 2025). Therefore, it is deemed that this notification was provided in alignment with requirements of Conditions 28 and 29. +4 November 2025 – An administrative non-compliance with Condition 4 was reported following issue of the 2025 EPBC Annual Compliance Report (dated 4 Nov 2025), related to implementation of the OS-OAMP for the reporting period. This notification was provided in alignment with requirements of Conditions 28 and 29. In the 7 Nov 2022 & 3 Nov 2023 incidents above, Stanmore failed to provide written notification of the identified non-compliances within the required two business days. DCCEEW issued Warning Letters to Stanmore on 14 March 2023 and again on 21 March 2024, for substantiated contravention of Conditions 1, 28 and 29 related to each of the above events respectively. In both cases, DCCEEW indicate in the Warning correspondence that the compliance matters for these issues are closed. Given the above, non-compliance against Condition 28 is identified for this Audit Period. That said, however, the Auditor notes the 2022 & 203 matters have been formally closed by DCCEEW, and that to date, DCCEEW have not required any further action related to the 2024 & 2025 notifications listed above. RECOMMENDATION: As recommended at Condition 25, Stanmore are to consult with DCCEEW regarding protocols for provision of separate notification and reporting for administrative non-compliances identified in annual and audit reports. If necessary, Stanmore will formalise notification and reporting to DCCEEW for the administrative non-compliance identified at Condition 25 following Stanmore's 14 December 2025 website upgrade and temporary removal of required reports from the Project website. In doing so, Stanmore will ensure notification and reporting aligns with requirements of Conditions 28 and 29.	N - Non-compliance	N - Non-compliance
28a	a. any condition which is or may be in breach;	Within the notification confirmation the approval holder has confirmed the condition that has been breached.	As above	As above	Condition is compliant as the condition in breach is included in the notifications.		Y - Compliance
28b	b. a short description of the incident and/or non-compliance, and	A short description has been provided of the incident or non-compliance.	As above	As above	Condition is compliant as a short description of the incident is included in the notifications.		Y - Compliance
28c	c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.	Location (including coordinates) date, time has been provided.	As above	As above	Condition is compliant as the location of the incident is included in the notifications.		Y - Compliance
29	The approval holder must provide to the department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:	Review dates of corrective actions submitted to the department for any incidents or non-compliance with the conditions of commitments made in the plans have been provided within 10 business days.	As above	As above	Not compliant for the Audit period due to reports being provided to DCCEEW outside of the required 10-day timeline, i.e.: +22 Nov 2022 – Report was provided to DCCEEW more than 10 business days after becoming aware of the event (2022 compliance report issued 2 Nov 2022) – NOT COMPLIANT +16 Nov 2023 - Report was provided to DCCEEW more than 10 business days after becoming aware of the event (2022 compliance report issued 2 Nov 2022) – NOT COMPLIANT However, as outlined at Condition 28 above, given DCCEEW have formally closed these matters and the Auditor's observations of Stanmore's ongoing commitment to the implementation and improvement of environmental compliance management practices, no further action with respect to the above identified non-compliances is considered warranted because of this Audit. Further potential non-compliance with Condition 28 is identified during the audit period, due to additional incidences of non-compliance with elements of Condition 25 that were identified during the 2024 & 2025 annual compliance reports for which separate notifications and reporting has not been provided other than that which is within the 2024 and 2025 annual compliance reports. These matters are considered administrative and low risk. RECOMMENDATION: As outlined at Conditions 25 and 27 above, Stanmore are to consult with DCCEEW regarding protocols for provision of separate notification and reporting for administrative non-compliances identified in annual and audit reports. If necessary, Stanmore will formalise notification and reporting to DCCEEW for the administrative non-compliance identified at Condition 25 following Stanmore's 14 December 2025 website upgrade and temporary removal of required reports from the Project website. In doing so, Stanmore will ensure notification and reporting aligns with requirements of Conditions 28 and 29.	N - Non-compliance	N - Non-compliance
	a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;	The notification must provide corrective actions.	As above	As above	Condition is compliant as corrective actions arising from the incident is included in the notifications.		Y - Compliance
	b. the potential impacts of the incident or non-compliance; and	Potential impacts resulting from the incident or non-compliance.	As above	As above	Condition is compliant as the potential impacts of the incident is included in the notifications.		Y - Compliance
	c. the method and timing of any remedial action that will be undertaken by the approval holder.	And method and timing of any remedial action undertaken.	As above	As above	Timing is included in the notifications. OBSERVATION: Majority of actions have been listed as completed however should follow up on items that are 'still in progress'. Advice from Stanmore personnel indicating progress towards closing out actions is noted, including budget approvals for signage etc. RECOMMENDATION: Review corrective actions arising from non-compliance / incident notifications and ensure that these are closed out in a timely manner.		O - Observation
Independent Audit							
30	The approval holder must ensure that independent audits of compliance with the conditions are conducted when requested in writing by the Minister.	Provided proof that the independent audits of compliance are conducted upon Minister's request.	+DCCEEW email & letter to Stanmore requesting the audit be conducted. +Stanmore & SLR contractual emails and associated correspondence including Stanmore Purchase Order issued to SLR to undertake the Audit. +Stanmore, SLR and DCCEEW correspondence outlining Auditor independence and qualifications, and DCCEEW subsequent approval of the Auditor and Assistant Auditor. +Lead Auditor direct engagement in the above. +This audit process.	+Email: RE: EPBC 2019/8413 - Isaac Downs Project near Moranbah, QLD - Direction to conduct an independent audit [SEC-OFFICIAL], 2 September 2025, Keith Horowitz - DCCEEW +Stanmore Purchase Order 450270781 issued to SLR Consulting Australia Pty Ltd	An independent audit of compliance against the conditions of approval EPBC 2019/8413 was requested by the Department on the 1 August 2025.	Y - Compliance	Y - Compliance
31	For each independent audit, the approval holder must:	Evidence of independent audit must provide	As above	As above	Audit documents as referenced at Conditions 30 and 31.		Y - Compliance
31a	a. provide the name and qualifications of the independent auditor and the draft audit criteria to the department;	Name and qualifications of the independent auditor and the draft audit criteria have been provided to the department	As above	As above	+Letter: RE: Isaac Downs Project, near Moranbah, Queensland – EPBC 2019/8413: Independent Audit 2025 – Managing Potential Conflict of Interest, 14 August 2025, ref 632.030620.00001, Anna Cochrane & Stephen Shoosmith, SLR Consulting Australia Pty Ltd. +Email: RE: EPBC 2019/8413 - Isaac Downs Project near Moranbah, QLD - Direction to conduct an independent audit [SEC-OFFICIAL], 27 August 2025, Belinda Parfitt, Stanmore	Stanmore provided the name and qualifications of the proposed independent Auditor and Assistant Auditor to DCCEEW in email dated 27 August 2025.	Y - Compliance
31b	b. only commence the independent audit once the audit criteria have been approved in writing by the department; and	Verify records indicating audit commencement date.	As above	As above	+Letter: Approval of Audit Criteria and Methodology - Isaac Downs Project, near Moranbah, Queensland EPBC 2019/8413, 10 October 2025, Thomas Long - DCCEEW +Audit site visit, 9 & 10 December 2026	The Audit Criteria and Methodology were approved on 10 October 2025. This audit commenced with site visit activities on 9 & 10 December 2025. Therefore, this condition is compliant.	Y - Compliance
31c	c. submit an audit report to the department within the timeframe specified in the approved audit criteria.	Submission of audit report to the department within a timeframe specified in the approved audit criteria has been met.	As above	As above	+Letter: Approval of Audit Criteria and Methodology - Isaac Downs Project, near Moranbah, Queensland EPBC 2019/8413, 10 October 2025, Thomas Long - DCCEEW +This audit report.	Not yet triggered. The approval for the Audit Criteria and Methodology specifies that the audit report be submitted to DCCEEW by 2 February 2026. Stanmore are on track to comply with this requirement..	NA - Not applicable
32	The approval holder must publish the audit report on the website within 10 business days of receiving the department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	Submission of the audit report published on the website within 10 business days of receiving the department's approval of the audit report.	As above	As above	As above	Not yet triggered. Observations of Stanmore's EPBC compliance management systems and processes indicates that they are on track to comply with this requirement within 10 days of receiving DCCEEW's approval of the independent audit report.	NA - Not applicable
Revision of Action Management Plans							
33	The approval holder may, at any time, apply to the Minister for a variation to a plan approved by the Minister, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised plan, the approval holder must then, from the date specified, implement the revised plan in place of the previous plan.	Ensure any variations of management plans have been submitted for approval by the minister in accordance with the conditions and requirements of section 143A of the EPBC Act. Confirm with approval holder if implementation of variation has been conducted.	+As outlined at Condition 17, above.	+As outlined at Condition 17, above.	This condition is compliant as the only variation to a plan approved by the Minister during the audit period was the revised GDEMMP as discussed in Condition 17. Information reviewed during the audit including website records and subsequent monitoring reports indicate Stanmore have implemented this updated plan in place of the previous version.	Y - Compliance	Y - Compliance
Completion of the Action							
34	Within 20 business days after the completion of the action, the approval holder must notify the department in writing and provide completion data.	Notification to the department within 20 business days after completion of action was submitted with completion data.	+Observations, information and evidence sighted during this audit process. +Site visit 9 & 10 December 2025 – confirming site operations and management actions are underway. +Personnel interviews – as above.	+Documents as referenced in this audit report. +Site visit 9 & 10 December 2025 – confirming site operations and management actions are underway. +Site visit 9 & 10 December 2025 – as indicated in this report.	Not triggered. Condition 34 is not triggered as at the time of the audit, the action is ongoing.	NA - Not applicable	NA - Not applicable



Appendix E Photographs

Isaac Downs 2025 EPBC Independent Audit Photolog

Photo 1: Neighbouring property with disturbance (10 December 2025)



Photo 2: Mine Water Dam (10 December 2025)



Photo 3: Isaac Downs ROM (with rehab in the foreground) (10 December 2025)



Photo 4: Isaac Downs ROM Dam 1 (10 December 2025)



Photo 5: Isaac Downs ROM Dam 1 (10 December 2025)



Photo 6: Revegetation on slope at Isaac Downs North West Dump (10 December 2025)



Photo 7: Isaac Downs ROM Dam 2(10 December 2025)



Photo 8: Drain Isaac Downs Mine Affected Water Drain (10 December 2025)



Photo 9: Monitoring camera for drain (10 December 2025)



Photo 10: Area with vegetation boundary marker near topsoil stockpiles

(10 December 2025)



Photo 11: View towards Isaac River (10 December 2025)



Photo 12: Scar tree at meeting spot (10 December 2025)



Photo 13: Scar tree at meeting spot (10 December 2025)



Photo 14: Southern Sediment Dam (10 December 2025)



Photo 15: Isaac Downs Highwall (Southern End) - recently topsoil stripped. (10 December 2025)



Photo 16: Vegetation line along approved disturbance area on highwall at Isaac Downs (10 December 2025)



Photo 17: Vegetation line along approved disturbance area (10 December 2025)



Photo 18: soil stockpile (10 December 2025) (not the best example of how we store topsoil though – this is just a temporary dozer push stockpile that is waiting relocation to final stockpile placement).

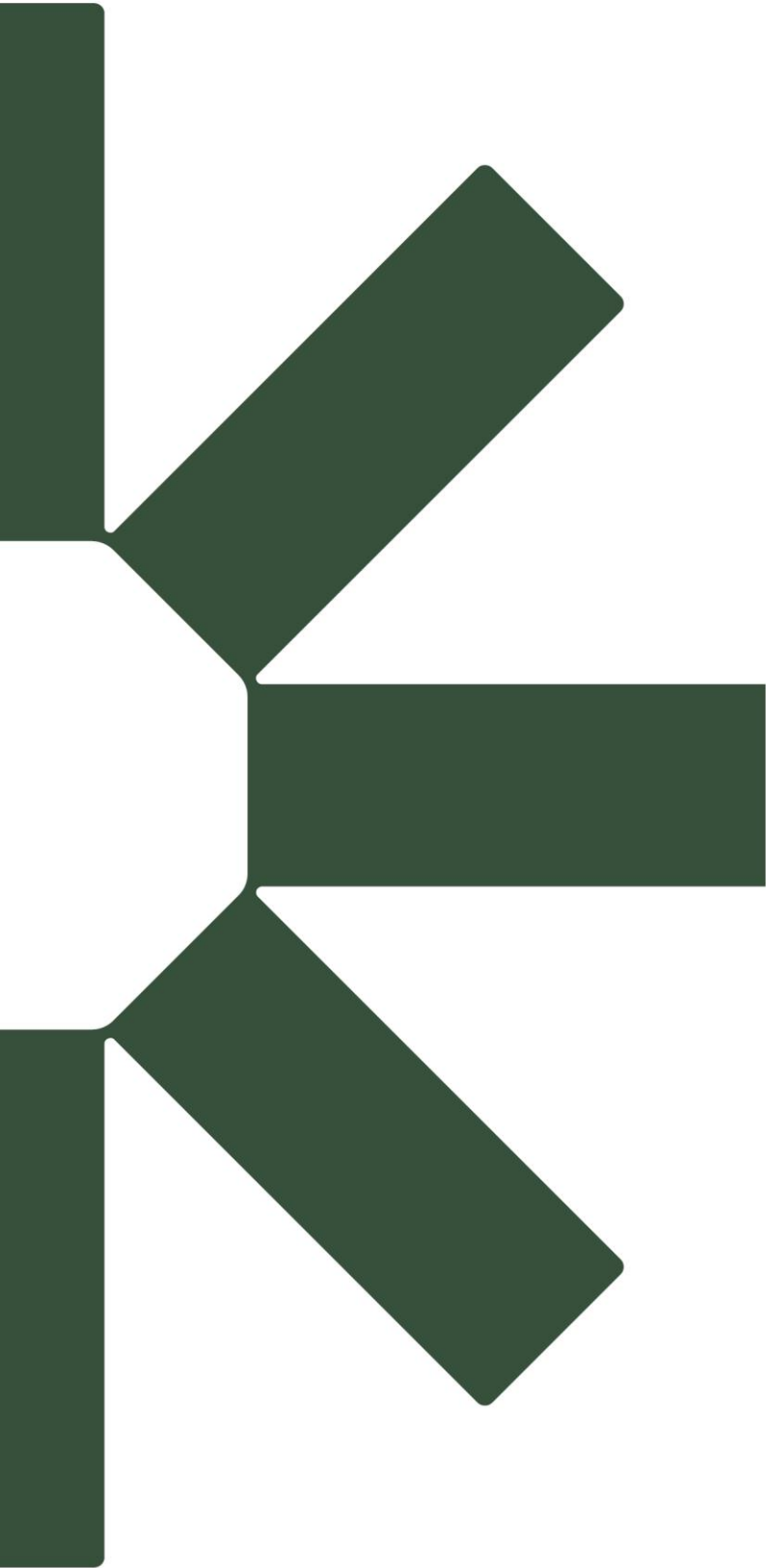


Photo 19: Pit with dragger Dragline (10 December 2025)



Photo 20: ROM pad (10 December 2025)





Making Sustainability Happen