

# **BHP Iron Ore**

## **EPBC Act Strategic Environmental Assessment**

### **– Annual Environmental Report –**

**July 2025 – June 2026**



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## Abbreviations

| Term                           | Meaning                                                                    |
|--------------------------------|----------------------------------------------------------------------------|
| AER                            | Annual Environmental Report                                                |
| ANFO                           | Ammonium Nitrate Fuel Oil                                                  |
| APOP                           | Assurance Plan and Offsets Plan (Version 2.3)                              |
| AWT                            | Above water table                                                          |
| BHP                            | BHP Iron Ore Pty Ltd                                                       |
| CPWRMP                         | BHP Central Pilbara Water Resource Management Plan                         |
| Cth                            | Commonwealth                                                               |
| DAWE                           | Department of Agriculture, Water and the Environment (now DCCEEW)          |
| DBCA                           | Department of Biodiversity, Conservation and Attractions                   |
| DCCEEW                         | Department of Climate Change, Energy, the Environment and Water            |
| DoEE                           | Department of Environment and Energy (now DCCEEW)                          |
| DWER                           | Department of Water and Environmental Regulation                           |
| ELOR                           | Environmental Legal Obligations Register                                   |
| EMP                            | Environmental Management Plan                                              |
| EPBC or EPBC Act               | <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth) |
| ERI                            | Early Response Indicator                                                   |
| FMP                            | Fauna Management Plan                                                      |
| FY                             | Financial Year                                                             |
| FY2024                         | Financial Year 2024 (1 July 2023 to 30 June 2024)                          |
| FY2025                         | Financial Year 2025 (1 July 2024 to 30 June 2025)                          |
| FY2026 or the reporting period | Financial Year 2026 (1 July 2025 to 30 June 2026)                          |
| GIS                            | Geographical Information Systems                                           |
| GLUP                           | Global Land Use Permit (formerly known as 'PEAHR')                         |
| ha                             | Hectares                                                                   |
| IRR                            | Impact Reconciliation Report                                               |
| MAC                            | Mining Area C                                                              |
| MACEMP                         | Mining Area C Environmental Management Plan                                |
| MACFMP                         | BHP Mining Area C (South Flank) Fauna Management Plan                      |
| mAHD                           | Metres Australian Height Datum                                             |
| MAR                            | Managed Aquifer Recharge                                                   |
| mRL                            | meters Relative Level                                                      |
| MS                             | Ministerial Statement                                                      |
| ng/g                           | Nanogram per gram                                                          |
| OB                             | Orebody                                                                    |
| PEAHR                          | Project Environmental and Aboriginal Heritage Review (now GLUP)            |
| PEOF                           | Pilbara Environmental Offsets Fund                                         |
| POP                            | Pilbara Olive Python                                                       |
| SAA                            | Strategic Assessment Area                                                  |
| SEA                            | Strategic Environmental Assessment                                         |
| SNP                            | Single Nucleotide Polymorphism                                             |
| SSAN                           | Security Storage Ammonium Nitrate                                          |
| TSSC                           | Threatened Species Scientific Committee                                    |
| WA                             | Western Australian                                                         |
| WAIO                           | Western Australian Iron Ore                                                |

# Declaration of Accuracy

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

Signed

 Digitally signed by Tim Day  
DN: cn=Tim Day, c=AU, o=BHP -  
Perth, WA, ou=Asset President  
WAIO, email=tim.day@bhp.com  
Location: Perth, Australia  
Date: 2026.09.22 18:49:34 +08'00'

Full name (please print): Tim Day  
Position (please print): Asset President Western Australian Iron Ore (WAIO)  
Organisation: BHP Iron Ore  
CAN: ACN 008 700 981  
  
Date 22/09/2026

| Rev   | Description of Amendment | Organisation         | Name          |
|-------|--------------------------|----------------------|---------------|
| Rev 0 | Final Report             | BHP Iron Ore Pty Ltd | David Bunting |

# 1 Introduction

BHP Iron Ore Pty Ltd (BHP) holds the Pilbara Strategic Assessment Program (the Program), which was endorsed by the then Minister for the Environment and Energy on 11 May 2017 and an Approval Decision (the Approval) for taking actions in accordance with the Program was issued on 19 June 2017.

The Approval applies to the development of new iron ore mines and associated infrastructure and the expansion of existing iron ore mines and associated infrastructure within a defined Strategic Assessment Area in the Pilbara region of Western Australia (Map 1-1). Key commitments of the Program and conditions of the Approval include preparation and approval of an Assurance Plan and Offsets Plan and undertaking a validation process including preparation of a Validation Notice for each Notifiable Action (Figure 1.2) and Decision Reports for Non-Notifiable Actions.

The Assurance Plan and Offsets Plan were originally separate documents, endorsed by the then Federal Minister for Environment on 11 May 2018. A review of the plans was undertaken in 2022 as part of the first five-year review, with the outcome being a single combined Assurance Plan and Offsets Plan (APOP) (BHP 2023). The APOP was approved as version 2 by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) on 18 April 2023. Following subsequent minor administrative updates, version 2.3 (9 May 2023) is the most recent approved version and is herein referred to throughout this Annual Environmental Report (AER).

In accordance with the conditions of the approval decision relating to the Program, BHP is hereby submitting an AER for the reporting period between 1 July 2025 and 30 June 2026. An outline of the content of the report is provided below:

- Section 1: Introduction - Provides the Approval background and key terminology.
- Section 2: Approval Decision - Outlines compliance with the conditions of the Approval.
- Section 3: Program - Addresses the requirements of an annual report outlined in Part B, Chapter 5 of the endorsed Program.
- Section 4: Assurance Plan and Offsets Plan - Addresses the reporting requirements outlined in version 2.3 of the APOP. (Note that BHP will shortly commence the 10-year review of the APOP (due 19 December 2027) in accordance with Program requirements.)
- Section 5: Program Decisions and Disturbance
- Section 6: Validation Notices - Outlines compliance with obligations within the Validation Notices

Three new Validation Notices became effective during the reporting period (see Section 5 and specific sections mentioned below):

- Orebody 29/30/35 Validation Notice (effective 24 August 2025, see Section 6.10)
- Orebody 25 West Validation Notice (effective 27 April 2026, see Section 6.9)
- Marillana Creek (Yandi) Validation Notice (effective 29 June 2026, activity was not commenced during the reporting period and will be detailed in the next AER)

A further one Validation Notice was prepared during the reporting period but did not become effective. This will be detailed in the next AER:

- Ministers North Validation Notice (effective 3 July 2026)

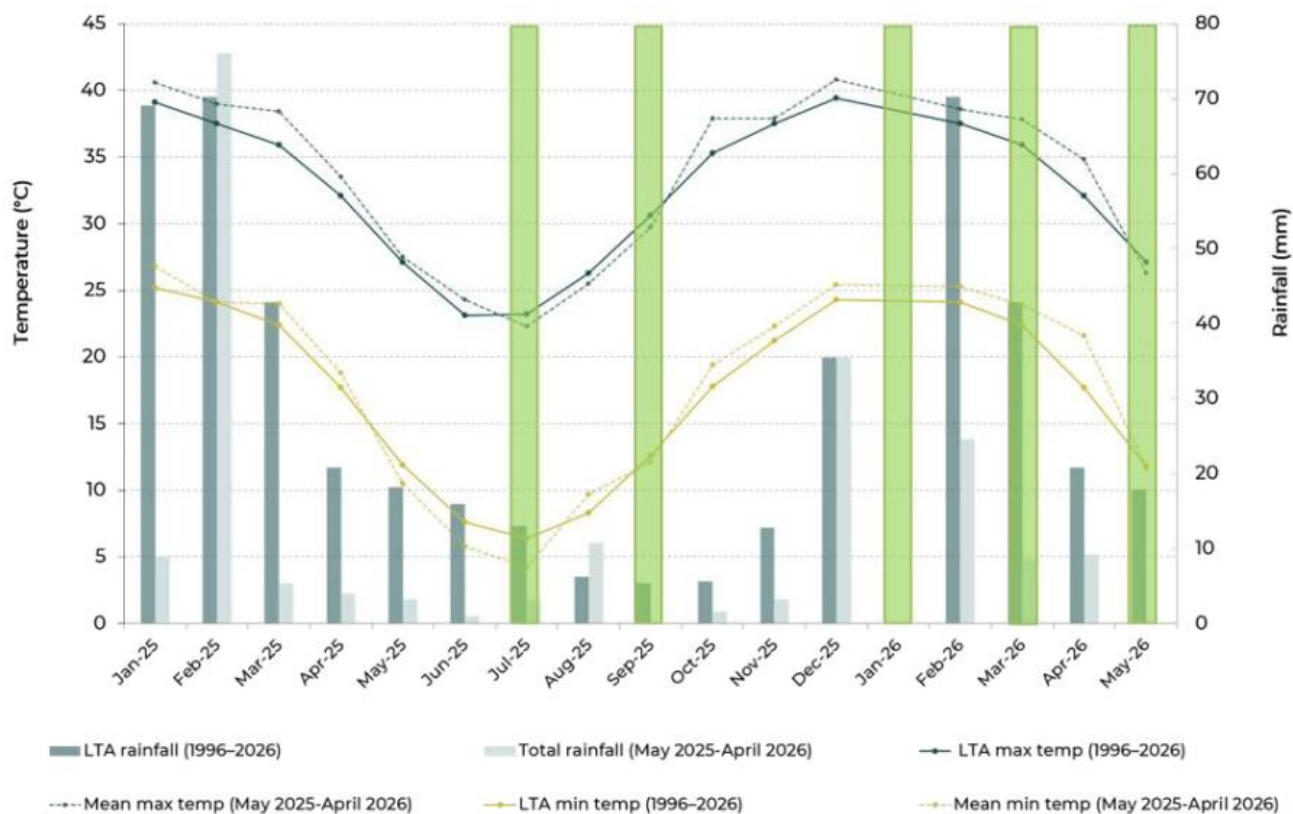
There were eight non-notifiable action Decision Reports finalised during the reporting period (see Section 5):

- Yandicoogina Gorge Mitigation Trial Additional Bore Installation (effective 07 July 2025)
- Yarnima IPG1 Project (effective 10 September 2025)
- Newman Source Water Upgrade (effective 24 March 2026)
- Ministers North Enabling Communication Works (effective 20 March 2026)
- Ministers North 132kV Relocation (effective 20 March 2026)
- Mesa Gap (effective 07 May 2026)
- OB32 Go Line (effective 29 May 2026)
- Yarnima IPG1 Project Amendment (effective 04 June 2026)

There were no non-compliances with the Approval, APOP reporting requirements or Validation Notice requirements identified during the reporting period.

Monitoring has been undertaken in accordance with the Program and specific Validation Notices annual monitoring outcomes for Program Matter species are highly influenced by climatic and rainfall variability (see Figure 1-1) and should be considered in the context of climatic conditions and local population size for the reporting year.

Analysis of population trends over time for relative species Program Matters will be completed using monitoring data and baseline surveys within the APOP 10-year review in accordance with Program requirements.



**Figure 1-1 Current and long-term average climatic data for Newman Aero (green bars indicate Ghost Bat survey periods Central Hub) – (2025-2026 Biologic Environmental Services)**



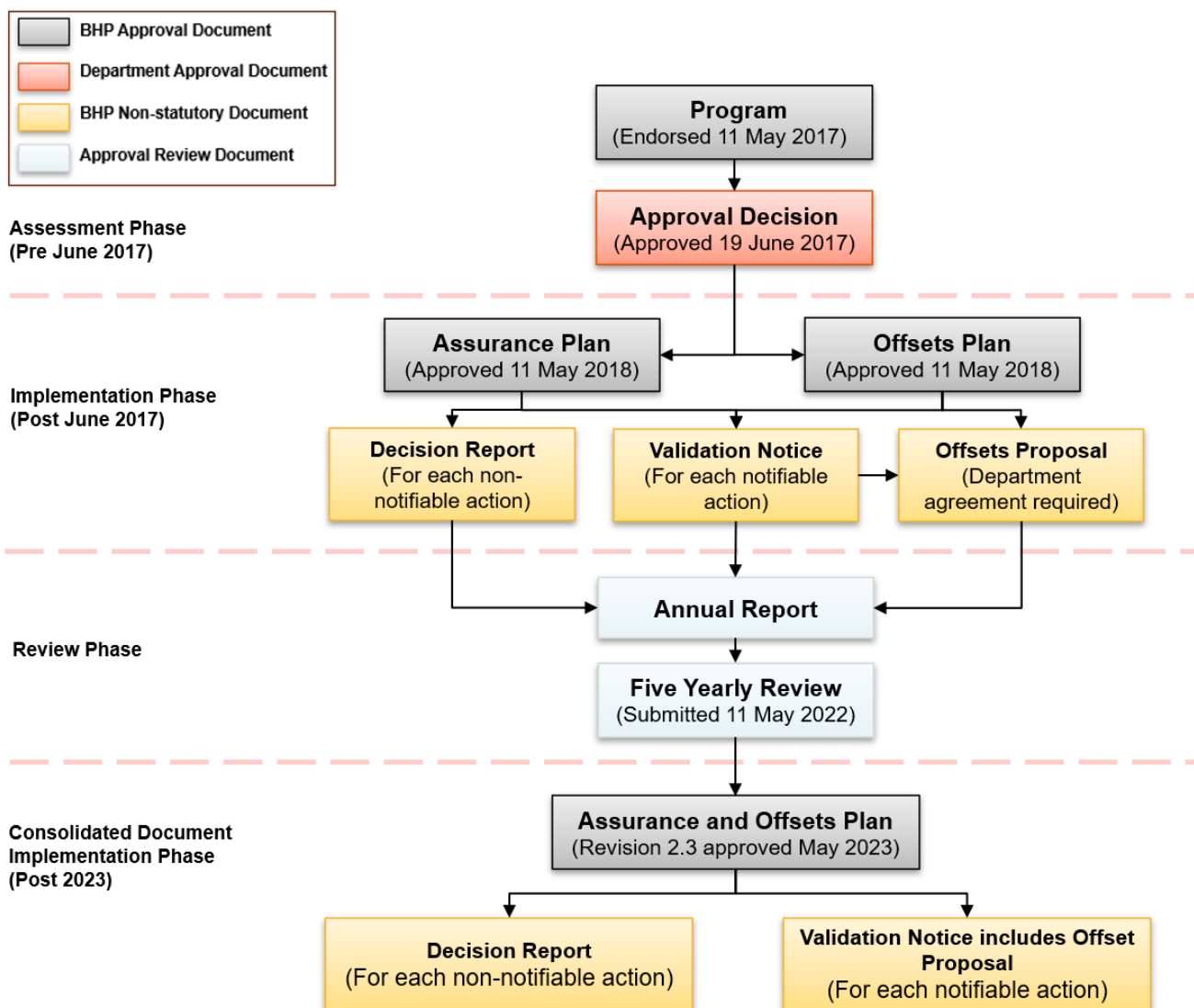


Figure 1-2 BHP Strategic Environmental Assessment – Approval Documents

## 2 EPBC SEA Approval Decision

Table 2-1 assesses compliance against the 10 conditions of the Approval.

**Table 2-1 Audit Table for the EPBC SEA Approval Decision (Approved: 19 June 2017)**

| Condition /Section | Requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | How                                                                                                                                                | Documentation                                                                                                                  | Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Timeframe                                              | Status                                     |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|--------------------------------------------|
| 1                  | The approval holder must implement the endorsed Program.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Implement Assurance Plan, Offset Plan and Validation Notices in accordance with criteria in the Program.                                           | Compliance reported annually in the BHP Iron Ore Strategic Environmental Assessment Annual Environmental Report (BHP SEA AER). | Activities have been implemented in accordance with the endorsed Program (see Conditions 3 and 7).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Life of Approval.                                      | Compliant.                                 |
| 2                  | The approval holder must not make any validation decisions as outlined in Part C of the endorsed Program after 70 years from the date of the Approval.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | No validation decisions to be made after 19 June 2087.                                                                                             | No validation decisions to be made after 19 June 2087.                                                                         | No validation decisions to be made after 19 June 2087.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | No validation decisions to be made after 19 June 2087. | Not relevant to this reporting period.     |
| 3                  | Within 12 months of the date of Approval, the approval holder must prepare and submit for the Minister's written Approval an Assurance Plan and an Offsets Plan in accordance with Section 3 of the endorsed Program.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Prepare and submit an Assurance Plan and Offsets Plan to the satisfaction of the Minister for Environment (or delegate).                           | Submitted Assurance Plan and Offset Plan.                                                                                      | The original Assurance Plan (dated 10 May 2018) and Offsets Plan (dated 10 May 2018) were prepared and submitted to the former Department of Energy and Environment (DoEE) (now DCCEEW) on 1 March 2018. This was within the 12-month timeframe. The Assurance Plan and Offsets Plan were approved by the DoEE on behalf of the Minister on 11 May 2018 (Reference Letter from G. Manning – Assistant Secretary Assessments (WA, SA, NT) and Post Approvals Branch Environment Standards Division dated 11 May 2018). Following a five-year review, a single combined Assurance Plan and Offsets Plan (BHP 2023) was prepared and approved by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) on 18 April 2023. BHP prepared a minor update and version 2.3 then came into effect on 9 May 2023. | Prior to 19 June 2018.                                 | Closed.                                    |
|                    | The approval holder must implement the approved Assurance Plan and Offsets Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Implement Validation Notices and Decisions Reports in accordance with the requirements of the approved Assurance Plan and Offsets Plan.            | Compliance reported annually in the BHP SEA AER.                                                                               | The current Assurance Plan and Offset Plan, version 2.3 (BHP 2023) has been implemented.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Annually for the duration of the Approval.             | Compliant.                                 |
|                    | The approval holder must publish the approved Assurance Plan and Offsets Plan on its website within one (1) month of receiving written notice that the Assurance Plan and Offsets Plan are approved.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Publish the approved Assurance Plan and Offsets Plan on the BHP external website.                                                                  | Submitted Assurance Plan and Offset Plan.                                                                                      | The current Assurance Plan and Offset Plan, version 2.3 (BHP 2023) was available within 1 month of the endorsement of version 2.0 by DCCEEW (endorsement occurred on 18 April 2023 and the current version was published on BHP's website on 9 May 2023: <a href="https://www.bhp.com/-/media/bhp/regulatory-information-media/iron-ore/western-australia-iron-ore/0000/western-australia-iron-ore-pilbara-strategic-assessment-commonwealth/20230509bhpwaioapoprev23.pdf">https://www.bhp.com/-/media/bhp/regulatory-information-media/iron-ore/western-australia-iron-ore/0000/western-australia-iron-ore-pilbara-strategic-assessment-commonwealth/20230509bhpwaioapoprev23.pdf</a> )).                                                                                                                                    | Within 1 month of Approval.                            | Complete.                                  |
| 4                  | <p>Unless otherwise agreed to in writing by the Minister, every five years from the date of Approval, the approval holder must review and revise the Assurance Plan and the Offsets Plan in accordance with Section 4.1 of the endorsed Program. The approval holder must submit the revised Plans for the Minister's Approval within 6 months of the five year anniversary of the date of Approval unless the Minister has agreed in writing that no revisions are necessary. If the approval holder does not submit the revised Plans for Approval, the approval holder may not give any further validation notices under Part C of the endorsed Program until the revised Plans have been submitted and approved.</p> <p>The Minister may, within 60 days of receipt by the Department of the revised Plans, advise the approval holder in writing that<br/>(a) the revised Plans are approved; or<br/>(b) additional revisions are required to be made to the Plans.</p> <p>If the Minister does not advise the approval holder within the 60 days, the revised Plans are taken to have been approved by the Minister and the approval holder must implement the revised Assurance Plan and Offsets Plan.</p> <p>If the Minister requires additional revisions to the Plans, the approval holder has to make the required revisions and resubmit the Plans for Approval.</p> <p>If the revised Plans are not submitted, no further validation notice may be given under Part C of the endorsed Program until the revised Plans have been submitted and approved.</p> | Prepare and submit a review and revision of the Assurance Plan and Offsets Plan to the satisfaction of the Minister for Environment (or delegate). | Five-yearly review document and revised Assurance Plan and Offsets Plan.                                                       | Not relevant within this reporting period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | The latest version (2.3) is dated May 2023.            | Not required during this reporting period. |

| Condition /Section | Requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | How                                                                                                                                                                                                                                          | Documentation                                                                                                                                                           | Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Timeframe                                    | Status                                                                                                                               |
|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
|                    | <p>The Minister has 30 days to advise the approval holder in writing whether the revised Plans are approved. If the Minister does not advise the approval holder within the 30 days, the revised Plans are taken to have been approved and the approval holder must implement the revised Assurance Plan and Offsets Plan.</p> <p>After receiving written notice from the Department that the revised Assurance Plan and Offsets Plan are approved, the approval holder must implement the revised Assurance Plan and Offsets Plan.</p> <p>The approval holder must publish and maintain the revised Assurance Plan and Offsets Plan on its website within one (1) month of receiving written notice from the Department that the plans have been approved.</p>                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                              |                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                              |                                                                                                                                      |
| 5                  | <p>At any time, the approval holder may choose to review and revise the Assurance Plan and/or the Offsets Plan without requiring the Minister's Approval of the revised Plans if the revision does not:</p> <p>(a) include changes to Program Matters Outcomes;</p> <p>(b) affect the achievement or monitoring of Program Matters Outcomes; or</p> <p>(c) include changes to environmental offsets for any Program Matters.</p> <p>If the approval holder makes this choice, the approval holder must notify the Department in writing that the current approved Assurance Plan and/or Offsets Plan has been revised and provide the Department with a copy of the revised Assurance Plan and/or Offsets Plan.</p> <p>The approval holder must implement the revised Assurance Plan and/or Offsets Plan from the date of the written notice to the Department.</p> <p>The approval holder must publish the revised Assurance Plan and Offsets Plan on their website within one (1) month of the written notice to the Department.</p> | Prepare and submit a review and revision of the Assurance Plan and Offsets Plan to the satisfaction of the Minister for Environment (or delegate).                                                                                           | Revised Assurance Plan and Offsets Plan.                                                                                                                                | Not required during this reporting period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Anytime during the duration of the Approval. | Revision not relevant to this reporting period – noting the 10-year APOP review will formally commence in the next reporting period. |
| 6                  | The approval holder must inform any person that they authorise, permit or request to undertake any activity of obligations under the endorsed Program and conditions attached to this Approval that restrict or regulate the undertaking of activities within the strategic assessment area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Obligations are maintained in the legal obligations register and documented within the Global Land Use Permit (GLUP) prior to undertaking activities.                                                                                        | Western Australian Iron Ore (WAIO) Environmental Legal Obligations Register (ELOR) and GLUP documentation.                                                              | All Validation Notice and Decision Report obligations are maintained in BHP's ELOR system and subsequently included in site-specific land use permits, as raised across WAIO operations. Furthermore, all active Validation Notices are published on BHP's website ( <a href="https://www.bhp.com/sustainability/environment/regulatory-information">https://www.bhp.com/sustainability/environment/regulatory-information</a> ) During the reporting year, this requirement continued to be met via the upload of the three new effective Validation Notices and eight new Decision Reports to ELOR, including all relevant obligations. These obligations have been documented/included into relevant land use permits as raised.  | Prior to undertaking activities.             | Compliant.                                                                                                                           |
| 7                  | An upper disturbance limit of 110,000 hectares applies to the approval holder. All activities that result in a direct disturbance will account towards the upper disturbance limit. The approval holder may undertake activities that result in a direct disturbance up to the maximum of 110,000 hectares less any direct disturbance permitted in a section 146B approval given in relation to assets divested by the approval holder and for which a validation notice has been given.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Maintain the program disturbance tracking register.                                                                                                                                                                                          | Program disturbance tracking register.                                                                                                                                  | Section 5 details the current disturbance undertaken during the reporting period against the upper disturbance limit. A total of 28,519.5 ha of disturbance has been allocated via Validation Notices and Decision Reports since July 2018. The current total disturbance has not exceeded the upper disturbance limit of 110,000 ha.                                                                                                                                                                                                                                                                                                                                                                                                | Annually for the duration of the Approval.   | Compliant.                                                                                                                           |
| 8                  | By the first business day in October of each year after the commencement of this Approval, the approval holder must submit a report to the Department and publish the report on its website. The report must address the requirements of an annual report outlined in Part B of the endorsed Program.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Prepare and submit annual report and publish on BHP external website                                                                                                                                                                         | BHP SEA AER.                                                                                                                                                            | <p>This document forms the FY2026 "annual report" under the Approval for the 1 July 2025 to 30 June 2026 period.</p> <p>The FY2025 report was submitted on 25 September 2025 and was available on the BHP website from 1 October 2025. (<a href="https://www.bhp.com/-/media/bhp/regulatory-information-media/iron-ore/western-australia-iron-ore/0000/annual-environmental-reports/sea-aer-fy2025-final---signed.pdf">https://www.bhp.com/-/media/bhp/regulatory-information-media/iron-ore/western-australia-iron-ore/0000/annual-environmental-reports/sea-aer-fy2025-final---signed.pdf</a>)</p> <p>Section 3 documents the requirements of an annual report in accordance with Part B, Chapter 5 Reporting, of the Program.</p> | Annually for the duration of the Approval.   | Compliant.                                                                                                                           |
| 9                  | The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions attached to this Approval, including measures taken to implement the endorsed Program, Assurance Plan and Offsets Plan and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act or used to verify compliance with the conditions attached to this Approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.                                                                                                                                                                                                                                                                                                                                                                      | <ol style="list-style-type: none"> <li>1. Maintain the program disturbance tracking register.</li> <li>2. Document decisions regarding notifiable and Non-Notifiable Actions</li> <li>3. Maintain the legal obligations register.</li> </ol> | <ol style="list-style-type: none"> <li>1. Program disturbance tracking register.</li> <li>2. Validation notices and decision reports.</li> <li>3. WAIO ELOR.</li> </ol> | <ol style="list-style-type: none"> <li>1. Section 5 provides an extract of the Program disturbance tracking register, which details the disturbance undertaken during the reporting period against the upper disturbance limit.</li> <li>2. There were three Validation Notices and eight Decision Reports completed during the reporting period.</li> <li>3. BHP is utilising the WAIO ELOR database to administer and report against legal obligations.</li> </ol>                                                                                                                                                                                                                                                                 | Duration of the Approval.                    | Compliant.                                                                                                                           |
| 10                 | Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions attached to this Approval is conducted and a report submitted to the Minister. The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Appoint a Minister-approved independent auditor to undertake an audit of compliance with conditions.                                                                                                                                         | Independent auditors report.                                                                                                                                            | Not required during this reporting period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | When requested by the Minister.              | Not required during this reporting period.                                                                                           |

3 EPBC SEA Program Part B

Table 3-1 assesses compliance against the seven requirements of the reporting section of the Program.

Table 3-1 Audit Table for the EPBC SEA Program Part B

| Chapter     | Condition/<br>Section | Requirement                                                                                                                                                                                                               | How                                                                          | Documentation                          | Evidence                                                                                                                                                                                                                                                                                                                                                                                                             | Timeframe                                                             | Status                                     |
|-------------|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|--------------------------------------------|
| 5 Reporting | Item 1                | Compliance with the Assurance Plan and Offsets Plan and Validation Notices.                                                                                                                                               | Assess as part of the BHP annual reporting process.                          | BHP SEA AER.                           | Please refer to Table 4-1 as evidence of Assurance Plan and Offsets Plan compliance.<br><br>There were no deviations from or non-compliance with the Validation Notices during the FY2026 reporting period.                                                                                                                                                                                                          | Annually for the duration of the Approval.                            | Compliant.                                 |
|             | Item 2                | Actions determined not notifiable.                                                                                                                                                                                        | Assess activities against the Program and Assurance Plan and Offset Plan     | Decision Report.                       | There were eight non-notifiable actions in the reporting period as identified in Section 5.                                                                                                                                                                                                                                                                                                                          | Duration of the Approval.                                             | Compliant.                                 |
|             | Item 3                | Activities determined to be a notifiable action.                                                                                                                                                                          | Assess activities against the Program and Assurance Plan and Offset Plan.    | Decision Report and Validation Notice. | There were three actions determined to be Notifiable in the reporting period.                                                                                                                                                                                                                                                                                                                                        | Duration of the Approval.                                             | Compliant.                                 |
|             | Item 4                | Progress of notifiable actions, including when notifiable actions have commenced and completed.                                                                                                                           | Review progress of notifiable actions.                                       | Program disturbance tracking register. | See Section 5: Program Decisions and Disturbance and Section 6: Validation Notices.                                                                                                                                                                                                                                                                                                                                  | Annually for the duration of the Approval.                            | Compliant.                                 |
|             | Item 5                | Assets divested through the process described in Section 2.1, noting the status of environmental obligations under this Program at the time of divestment.                                                                | Review BHP divestment activities.                                            | Asset database.                        | No assets, subject to the Program, were divested during the reporting period.                                                                                                                                                                                                                                                                                                                                        | Annually for the duration of the Approval.                            | Not required during this reporting period. |
|             | Item 6                | An account of the upper disturbance limit for all activities taken within the Strategic Assessment Area. This will include any direct disturbance that has occurred in the twelve month period and as a cumulative total. | Maintain the program disturbance tracking register.                          | Program disturbance tracking register. | Details of disturbance undertaken during the reporting period and the cumulative disturbance is provided in Section 5: Program Decisions and Disturbance.                                                                                                                                                                                                                                                            | Annually for the duration of the Approval.                            | Compliant.                                 |
|             | Item 7                | Results of the five yearly review as described in Sections 4.1.1. and 4.1.2.                                                                                                                                              | Prepare and submit a five yearly review to the satisfaction of the Minister. | Five yearly review document.           | Not relevant within the reporting period.<br><br>BHP undertook the first comprehensive review of the implementation framework in 2022, as per the five yearly review document submitted to the DCCEEW on the 16 December 2022.<br><br>The second review (Ten Year Review) is due after 19 December 2026 and before 19 December 2027, as per Table 8.2 in the Assurance Plan and Offset Plan, version 2.3 (BHP 2023). | Second review due after 19 December 2026 and before 19 December 2027. | Not required during this reporting period. |

## 4 EPBC SEA Assurance Plan and Offsets Plan (Version 2.3)

Table 4-1 assesses compliance against the APOP version 2.3 Annual Environmental Report reporting requirements.

**Table 4-1 Audit Table for the EPBC SEA Assurance and Offsets Plan (Version 2.3)**

| Chapter                                                     | Condition/Section | Requirement                                                                                                                                                                                                                                                                                                                                                                                             | How                                                                                                                      | Documentation                                                     | Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Timeframe                                  | Status     |
|-------------------------------------------------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|------------|
| 8 Implementation, Review, Adaptive Management and Reporting | Item 1            | 8.7 Data Management<br>An annual review of the site monitoring register and the guideline trigger values to ensure the program is efficient, risk based and meets compliance requirements.                                                                                                                                                                                                              | Review site monitoring registers and compliance audits.                                                                  | Site monitoring register and compliance audit reports.            | Site monitoring register reviews have been carried out across operations during the reporting period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Annually for the duration of the Approval. | Compliant. |
|                                                             | Item 2            | 8.7 Data Management<br>Environmental monitoring and measurement equipment is to be maintained/calibrated/verified in accordance with manufacturer's specifications.                                                                                                                                                                                                                                     | Review site monitoring registers and compliance audits.                                                                  | Site monitoring register and compliance audit reports.            | <p>Fauna monitoring programs were undertaken during the reporting period, with a broad objective to understand population demographics, habitat usage and movement relating to the relevant SEA Program Matters species.</p> <p>Methods utilised to detect and monitor Program Matters species include equipment, such as transmitters, radio-telemetry, acoustic/ultrasonic recordings, motion cameras, tissue and scat collection and genetic/DNA sampling. All monitoring techniques with monitoring and measurement equipment were conducted in accordance with manufacturer's specifications and relevant contemporary guidelines.</p> <p>Groundwater level and water quality monitoring was also undertaken during the reporting period where required and where mining and associated activities have the potential to impact on fauna habitat that supports Program Matter species (i.e. permanent waterholes).</p> <p>Maintenance, calibration and verification of equipment associated with water level and water quality sampling and analysis, was undertaken in accordance with the manufacturer's specifications and relevant industry standards. Furthermore, the site-specific Part V Operating Licences and Groundwater Operating Strategies, also outlines the specifications and standards to be adhered to. The details are reported in BHP's State Annual Environmental Report and the Annual Aquifer Report/Triennial Environmental Reports.</p> | Annually for the duration of the Approval. | Compliant. |
|                                                             | Item 3            | 8.7 Data Management<br>Verify source data integrity to determine if the data from a sampling point has been mapped against the correct data program, data type, test methods and units of measurement are accurate.                                                                                                                                                                                     | Review site monitoring registers and compliance audits.                                                                  | Site monitoring register and compliance audit reports.            | <p>Any vertebrate fauna Surveys and monitoring conducted during the reporting period includes a review and verification against existing records and mapping for Program Matter species to ensure that targeted fauna habitat sampling locations, records and measurements are accurate and up to date. Any new information on behaviour, movement and preferred habitat of Program Matters is also considered in future monitoring programs and surveys.</p> <p>Verification of the groundwater level monitoring data was completed during the reporting period. Verification activities included confirming sampling locations, checking monitoring equipment and ensuring consistency with previous monitoring data.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Annually for the duration of the Approval. | Compliant. |
|                                                             | Item 4            | 8.7 Data Management<br>Source monitoring data is analysed against trigger values, trends and outliers, and in consideration of the target environmental outcomes.                                                                                                                                                                                                                                       | Review site monitoring registers and compliance audits.                                                                  | Site monitoring register and compliance audit reports.            | <p>Section 6 provides a review of any Program Matter monitoring programs against any trigger values, trends and outliers to determine if the Program Matter Objectives and Outcomes are being met.</p> <p>Some monitoring results from the period are not yet available due to surveys not aligning with reporting timelines and will be reviewed and reported in the subsequent reporting period.</p> <p>Source monitoring data (groundwater level monitoring data) was compared against trigger values during the reporting period. This is reported in the Annual Aquifer Report/Triennial Aquifer Report for each site operating area.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Annually for the duration of the Approval. | Compliant. |
|                                                             | Item 5            | 8.7 Data Management<br>An investigation is required for any values that are above triggers and thresholds.                                                                                                                                                                                                                                                                                              | Review site monitoring registers and compliance audits.                                                                  | Site monitoring register and compliance audit reports.            | There were no exceedances of triggers or thresholds during the reporting period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Annually for the duration of the Approval. | Compliant. |
|                                                             | Item 6            | 8.10 Annual Environmental Report<br>BHP decisions (Notifiable Actions and Non-Notifiable Actions) in relation to its activities within the SAA, and its compliance in relation to the upper disturbance limit of 110,000 ha specified in section 2.4 of the Program. An outline of offsets applicable to the decision, including offsets required under other legislation will be specified in the AER. | Review progress of Notifiable Actions and Non-Notifiable Actions and maintain the program disturbance tracking register. | <p>BHP SEA AER.</p> <p>Program disturbance tracking register.</p> | <p>Section 5 presents a brief summary of activity completed, as well as disturbance data, for all Notifiable Actions (Validation Notices) and Non-Notifiable Actions (Decision Reports) during the FY2026 reporting period.</p> <p>Section 6 presents a more detailed update on each of the Notifiable Actions (Validation Notices).</p> <p>An outline of offsets applicable to Validation Notices, including offsets required by other legislation are specified in Section 6 of the AER.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Annually for the duration of the Approval. | Compliant  |

| Chapter | Condition/<br>Section | Requirement                                                                                                                                                                                                                                    | How                                                                                                                                                                                       | Documentation                                                                                                                  | Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Timeframe                                                     | Status                                     |
|---------|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|--------------------------------------------|
|         | Item 7                | 8.10 Annual Environmental Report<br>Notifiable Actions identified under the Program during the period covered by the report.                                                                                                                   | Assess activities against the Program and Assurance Plan.                                                                                                                                 | Validation Notice.                                                                                                             | There were three actions determined to be Notifiable Actions (Validation Notices) in the reporting period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Annually for the duration of the Approval.                    | Compliant.                                 |
|         | Item 8                | 8.10 Annual Environmental Report<br>Details of activities within the scope of the Program which were commenced during the period covered by the report but were determined not to be notifiable.                                               | Review progress of Non-Notifiable Actions and maintain the program disturbance tracking register.                                                                                         | BHP SEA AER.<br><br>Program disturbance tracking register.                                                                     | Details of activities, which were determined to be Non-Notifiable (Decision Reports), are provided in Section 5.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Annually for the duration of the Approval.                    | Compliant.                                 |
|         | Item 9                | 8.10 Annual Environmental Report<br>Status of implementation (planned start date, action commenced and planned completion date; and action completed) of all Notifiable Actions.                                                               | Review progress of notifiable actions and maintain the program disturbance tracking register.                                                                                             | BHP SEA AER.<br><br>Program disturbance tracking register.                                                                     | Status of implementation of all Notifiable Actions (Validation Notices) are provided in Section 5.<br><br>Section 6 presents a more detailed update on each of the Notifiable Actions (Validation Notices).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Annually for the duration of the Approval.                    | Compliant.                                 |
|         | Item 10               | 8.10 Annual Environmental Report<br>Assets divested through the process described in section 2.1 of the Program.                                                                                                                               | Review BHP divestment activities.                                                                                                                                                         | Asset database.                                                                                                                | No assets, subject to the Program, were divested during the reporting period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Annually for the duration of the Approval.                    | Not required during this reporting period. |
|         | Item 11               | 8.10 Annual Environmental Report<br>Status of offsets implemented for each Notifiable Action.                                                                                                                                                  | Review progress of offset plans for notifiable actions.                                                                                                                                   | BHP SEA AER.                                                                                                                   | <p>The latest APOP (Version 2.3; BHP 2023), requires that an Offset Proposal section is included in each Validation Notice. The status of offset implementation is reported in Section 6 for each Validation Notice.</p> <p>BHP has committed to implementing offsets via financial contributions to the Pilbara Environmental Offset Fund (PEOF) to offset any residual impacts to Program Matters. Mining Area C – South Flank Validation Notice and the Jimblebar Optimisation Project 1 (for which offsets were considered addressed under state offset requirements and subsequently revised and included in the Jimblebar Optimisation Project Revised Validation Notice, are an exception to this, where Mining Area C – South Flank Validation Notice has a separate Offset Plan (see below).</p> <p>BHP initially submitted the Offsets Plan for Mining Area C-South Flank for review on 14 December 2018. Since this time, BHP has been in discussions with DCCEEW on the Offsets Plan. DCCEEW provided agreement in-principle for Version 0 of the Offsets Plan on 18 July 2025, subject to further review. BHP submitted Version 1 for DCCEEW review on 22 April 2026. A response from DCCEEW was pending at the end of the FY2026 reporting period.</p> <p>During this reporting period, advanced financial offset payments were made to the PEOF for Orebody 25 West and Orebody 29/30/25 Validation Notices. Refer to Section 6 for more information.</p> | Annually for the duration of the Approval.                    | Compliant                                  |
|         | Item 12               | 8.10 Annual Environmental Report<br>Disturbance areas associated with all actions, whether material or non-material, implemented since the Approval, with both the annual disturbance and the total disturbance (since the Approval) included. | Maintain the program disturbance tracking register.                                                                                                                                       | Program disturbance tracking register.                                                                                         | Details of disturbance undertaken during the reporting period, as well as total disturbance (since the Approval) is provided in Section 5.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Annually for the duration of the Approval.                    | Compliant.                                 |
|         | Item 13               | 8.10 Annual Environmental Report<br>Monitoring, management and corrective actions implemented during the reporting period to avoid, mitigate and offset impacts to Program Matters.                                                            | Maintain the program disturbance tracking register.                                                                                                                                       | Program disturbance tracking register.                                                                                         | This is provided in Sections 5 and 6 of this AER.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Annually for the duration of the Approval.                    | Compliant                                  |
|         | Item 14               | 8.10 Annual Environmental Report<br>Outcomes of compliance audits undertaken during the period covered by the report.                                                                                                                          | Review outcomes of compliance audits completed during the reporting period.                                                                                                               | Compliance audit reports.                                                                                                      | One compliance audit and one layered audit were completed during the FY2026 reporting period. Audit outcomes were related to management system improvements, monitoring data analysis and adaptive management. Actions to improve data visibility and analysis will be completed by FY27 H1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Report annually on outcomes for the duration of the Approval. | Compliant                                  |
|         | Item 15               | 8.10 Annual Environmental Report<br>Attainment of Program Matter Objectives and Outcomes.                                                                                                                                                      | <p>Review site monitoring registers and compliance audits undertaken during the reporting period.</p> <p>Prepare and submit a five yearly review to the satisfaction of the Minister.</p> | <p>Compliance audit reports.</p> <p>BHP SEA AER.</p> <p>Five-yearly review document if applicable during reporting period.</p> | <p>Section 6 provides further information on each of the Notifiable Actions (Validation Notices).</p> <p>Five-yearly review not due within the reporting period.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Annually for the duration of the Approval.                    | Compliant                                  |
|         | Item 16               | 8.10 Annual Environmental Report<br>Summary of any exceedances of the Program Matter Outcomes relevant to each Notifiable Action, and corrective actions taken.                                                                                | Review decision reports, notifiable actions and compliance audits undertaken during the reporting period.                                                                                 | Monitoring reports.                                                                                                            | No exceedances of the Program Matter Outcomes were identified during the reporting period. See Section 6.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Annually for the duration of the Approval.                    | Compliant.                                 |

| Chapter                                          | Condition/<br>Section | Requirement                                                                                                                                                                      | How                                                                                                       | Documentation                                                                                                                                                                                                                | Evidence                                                                                                                                                                                                                                                                                                                                                                                                        | Timeframe                                  | Status       |
|--------------------------------------------------|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|--------------|
|                                                  | Item 17               | 8.10 Annual Environmental Report<br>The effectiveness of management and corrective actions to avoid, mitigate and/or offset impacts to Program Matters.                          | Assess management commitments outlined in Validation Notices in the AER.                                  | BHP SEA AER.                                                                                                                                                                                                                 | Section 6 provides further information for each of the Notifiable Actions (Validation Notices).                                                                                                                                                                                                                                                                                                                 | Annually for the duration of the Approval. | Compliant    |
|                                                  | Item 18               | 8.10 Annual Environmental Report<br>Deviations from the Program or from information and management commitments contained in a Validation Notice for a Notifiable Action.         | Review decision reports, notifiable actions and compliance audits undertaken during the reporting period. | Monitoring registers and monitoring report and data review.<br><br>Compliance audit reports.<br><br>Land disturbance data.<br><br>PEOF fund, DWER invoice references and BHP PEOF Registers.<br><br>Event Management System. | There were no deviations from the Validation Notices during the FY2026 reporting period.                                                                                                                                                                                                                                                                                                                        | Annually for the duration of the Approval. | Compliant    |
|                                                  | Item 19               | 8.10 Annual Environmental Report<br>A summary of Pilbara Environmental Offsets Fund (PEOF) Impact Reconciliation Report submitted (refer Section 15.1 of the APOP).              | Land disturbance requiring offset and financial contribution to PEOF summarised in AER                    | PEOF fund DWER invoice reference.                                                                                                                                                                                            | BHP provides a summary of contributions to the PEOF for the reporting period in Section 6 of the AER.                                                                                                                                                                                                                                                                                                           | Annually for the duration of the Approval. | Compliant    |
|                                                  | Item 20               | 8.10 Annual Environmental Report<br>Outcomes of the five yearly reviews where these reviews occur within the reporting period (refer Section 8.12 of the APOP).                  | Prepare and submit a five yearly review to the satisfaction of the Minister.                              | Five-yearly review document and revised Assurance Plan and Offsets Plan.                                                                                                                                                     | Not relevant within this reporting period. The Ten-Year Review is planned for 2027.                                                                                                                                                                                                                                                                                                                             | Every five years.                          | Not required |
| 16 Monitoring, Reporting and Adaptive Management | Item 1                | 16.3 Annual Environmental Report<br>BHP will provide a progress summary of the offsets implemented and achievement of outcomes from the funding provided to the PEOF in the AER. | Review of financial contribution to PEOF through IRRs.                                                    | PEOF fund, DWER invoice references and BHP PEOF Registers.                                                                                                                                                                   | BHP made advanced financial contributions to the PEOF for the two Validation Notices which became effective during the reporting period.<br><br>BHP provides a summary of financial contributions to the PEOF in the discussion in Section 6.<br><br>PEOF have an Implementation Plan and details of current and future projects on their website (see Pilbara Environmental Offsets Fund implementation plan). | Annually for the duration of the Approval. | Compliant    |
|                                                  | Item 2                | 16.3 Annual Environmental Report<br>BHP will prepare an AER as outlined in Section 8.10 of the APOP (see reference to items 1-15 under Section 8.10 of this table)               | Preparation of this SEA AER.                                                                              | This BHP SEA AER.                                                                                                                                                                                                            | This document forms the “AER” under the Approval for the 1 July 2025 to 30 June 2026 period and will be added to BHP’s external website.                                                                                                                                                                                                                                                                        | Annually for the duration of the Approval. | Compliant    |

## 5 Program Decisions and Disturbance

Three notifiable actions became ‘effective’ and eight Non-Notifiable Actions were documented during the reporting period. Table 5-1 lists all the validation notices and decision reports that have been made under the Program to date, the disturbance allocated to each decision and the disturbance completed during the reporting period. Table 5-2 shows the disturbance by habitat type to 30 June 2026 for all Validation Notices and Decision Reports.

**Table 5-1 Program Decisions and Disturbance undertaken during the FY2026 reporting period**

| Project Name                                                       | Activities completed during reporting period | Decision Rationale                                                                                                                                    | Decision Made         | Date Decision Effective From | Proposed disturbance (ha) | Overall cumulative program disturbance remaining (ha) | Activity disturbance June 2018 to June 2025 | Activity disturbance 1 July 2025 to 30 June 2026 (ha) | Total activity disturbance to 30 June 2026 (ha) | Overall cumulative activity disturbance remaining (ha) |
|--------------------------------------------------------------------|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------------------------------|---------------------------|-------------------------------------------------------|---------------------------------------------|-------------------------------------------------------|-------------------------------------------------|--------------------------------------------------------|
| Mining Area C                                                      | Commenced                                    | Project fulfils the triggers of the Assurance Plan for Greater Bilby, Northern Quoll, Pilbara Leaf-Nosed Bat, Ghost Bat and Pilbara Olive Python.     | Validation Notice     | July 2018                    | 16,000.00                 | 94,000.00                                             | 5,004.45                                    | 394.95                                                | 5,399.40                                        | 104,600.60                                             |
| Jimblebar OSA1 Stage 1                                             | Completed                                    | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | August 2018                  | 95.00                     | 93,905.00                                             | 94.73                                       | 0.00                                                  | 94.73                                           | 104,505.87                                             |
| Western Creek Diversion                                            | Completed                                    | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | February 2020                | 15.00                     | 93,890.00                                             | 5.20                                        | 0.00                                                  | 5.20                                            | 104,500.67                                             |
| MAC Surplus Water                                                  | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | April 2020                   | 0.00                      | 93,890.00                                             | 0.00                                        | 0.00                                                  | 0.00                                            | 104,500.67                                             |
| Jimblebar Optimisation Project                                     | Commenced                                    | Project fulfils the triggers of the Assurance Plan for the Greater Bilby, Northern Quoll, Pilbara Leaf-Nosed Bat, Ghost Bat and Pilbara Olive Python. | Validation Notice     | June 2020                    | 2,000.00                  | 91,890.00                                             | 515.43                                      | 0.00                                                  | 515.43                                          | 103,985.24                                             |
| OB31 Stage 1 Clearing                                              | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | December 2022                | 5.00                      | 91,885.00                                             | 0.09                                        | 0.00                                                  | 0.09                                            | 103,985.15                                             |
| Mooka Rail Works                                                   | Completed                                    | Records of Northern Quolls exist within a 500-m buffer of the activity boundary.                                                                      | Validation Notice     | July 2023                    | 23.00                     | 91,862.00                                             | 5.82                                        | 0.00                                                  | 5.82                                            | 103,979.33                                             |
| Jimblebar Optimisation Project Revised                             | Commenced                                    | Program Matter records occur within the Activity Area.                                                                                                | Validation Notice     | September 2023               | 1,042.00                  | 90,820.00                                             | 440.24                                      | 76.86                                                 | 517.10                                          | 103,462.23                                             |
| Newman Hub Western Ridge                                           | Commenced                                    | The Project meets the Notifiable Action Triggers for Northern Quoll, Ghost Bat and Pilbara Olive Python.                                              | Validation Notice     | October 2023                 | 4,266.00                  | 86,554.00                                             | 848.69                                      | 235.40                                                | 1,084.09                                        | 102,378.14                                             |
| Yeerabiddy Rail Works                                              | Completed                                    | Records of Ghost Bats exist within a 500-m buffer of the activity boundary.                                                                           | Validation Notice     | October 2023                 | 60.02                     | 86,494.00                                             | 20.85                                       | 0.00                                                  | 20.85                                           | 102,357.29                                             |
| Thirteen Creek Drilling Program                                    | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | August 2023                  | 11.00                     | 86,483.00                                             | 10.23                                       | 5.25                                                  | 15.47                                           | 102,341.82                                             |
| Rail decarbonisation electrification project                       | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | August 2023                  | 0.02                      | 86,483.00                                             | 0.00                                        | 0.00                                                  | 0.00                                            | 102,341.82                                             |
| Orebody 32 Below Water Table                                       | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | September 2023               | 224.00                    | 86,259.00                                             | 31.79                                       | 1.27                                                  | 33.05                                           | 102,308.77                                             |
| Newman West (Mount Whaleback Mine)                                 | Not Commenced                                | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | November 2023                | 155.00                    | 86,104.00                                             | 0.00                                        | 0.00                                                  | 0.00                                            | 102,308.77                                             |
| Newman Water Treatment Plant Tank Replacement and Upgrades         | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | November 2023                | 7.00                      | 86,097.00                                             | 1.64                                        | 0.00                                                  | 1.64                                            | 102,307.13                                             |
| Jimblebar Met Mast Decision Report                                 | Completed                                    | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | November 2023                | 2.00                      | 86,095.00                                             | 0.26                                        | 0.00                                                  | 0.26                                            | 102,306.87                                             |
| Jugari (Yandicoogina) Gorge Supplementation Trial Project          | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | May 2024                     | 1.00                      | 83,982.00                                             | 0.23                                        | 0.00                                                  | 0.23                                            | 102,306.64                                             |
| Jimblebar Significant Amendment                                    | Commenced                                    | The Project meets the Notifiable Action Triggers for the Ghost Bat and Northern Quoll.                                                                | Validation Notice     | September 2024               | 2067.00                   | 84,028.00                                             | 0.00                                        | 143.75                                                | 143.75                                          | 102,162.89                                             |
| East Pilbara Surplus Water Drilling                                | Commenced                                    | The Project meets the Notifiable Action Trigger for the Greater Bilby.                                                                                | Validation Notice     | October 2024                 | 45.00                     | 83,983.00                                             | 4.66                                        | 34.42                                                 | 39.08                                           | 102,123.81                                             |
| Whaleback Hub Landfarm                                             | Not commenced                                | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | April 2025                   | 12.00                     | 83,970.00                                             | 0.93                                        | 0.15                                                  | 1.08                                            | 102,122.73                                             |
| Newman Water Treatment Plant Tank Replacement and Upgrades (Rev 2) | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | May 2025                     | 1.00                      | 83,969.00                                             | 0.00                                        | 0.00                                                  | 0.00                                            | 102,122.73                                             |
| Homestead Bore 46                                                  | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                                                                 | Non-Notifiable Action | June 2025                    | 38.00                     | 83,931.00                                             | 0.00                                        | 5.17                                                  | 5.17                                            | 102,117.56                                             |

| Project Name                                                     | Activities completed during reporting period | Decision Rationale                                                                                                  | Decision Made         | Date Decision Effective From | Proposed disturbance (ha) | Overall cumulative program disturbance remaining (ha) | Activity disturbance June 2018 to June 2025 | Activity disturbance 1 July 2025 to 30 June 2026 (ha) | Total activity disturbance to 30 June 2026 (ha) | Overall cumulative activity disturbance remaining (ha) |
|------------------------------------------------------------------|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------|-----------------------|------------------------------|---------------------------|-------------------------------------------------------|---------------------------------------------|-------------------------------------------------------|-------------------------------------------------|--------------------------------------------------------|
| Yandicoogina Gorge Mitigation Trial Additional Bore Installation | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                               | Non-Notifiable Action | July 2025                    | 5.4                       | 83,925.56                                             | 0.00                                        | 0.47                                                  | 0.47                                            | 102,117.09                                             |
| Orebody 29/30/35                                                 | Commenced                                    | The Project meets the Notifiable Action Trigger for the Ghost Bat and Pilbara Olive Python.                         | Validation Notice     | August 2025                  | 116.0                     | 83,809.56                                             | 0.00                                        | 0.00                                                  | 0.00                                            | 102,117.09                                             |
| Yarnima IPG1 Project                                             | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                               | Non-Notifiable Action | October 2025                 | 3.0                       | 83,806.56                                             | 0.00                                        | 1.82                                                  | 1.82                                            | 102,115.27                                             |
| Newman Source Water Upgrade                                      | Not commenced                                | Project does not meet the Notifiable Action Triggers.                                                               | Non-Notifiable Action | March 2026                   | 29.0                      | 83,777.56                                             | 0.00                                        | 0.00                                                  | 0.00                                            | 102,115.27                                             |
| Ministers North Enabling Communication Works                     | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                               | Non-Notifiable Action | March 2026                   | 1.1                       | 83,776.46                                             | 0.00                                        | 0.00                                                  | 0.00                                            | 102,115.27                                             |
| Ministers North 132kV Relocation                                 | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                               | Non-Notifiable Action | March 2026                   | 64.5                      | 83,711.96                                             | 0.00                                        | 0.00                                                  | 0.00                                            | 102,115.27                                             |
| Orebody 25 West                                                  | Commenced (permit process)                   | The Project meets the Notifiable Action Trigger for the Ghost Bat, Pilbara Leaf-nosed Bat and Pilbara Olive Python. | Validation Notice     | April 2026                   | 175.0                     | 83,536.96                                             | 0.00                                        | 1.01                                                  | 1.01                                            | 102,114.26                                             |
| Mesa Gap                                                         | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                               | Non-Notifiable Action | May 2026                     | 59.0                      | 83,477.96                                             | 0.00                                        | 8.30                                                  | 8.30                                            | 102,105.96                                             |
| OB32 Go Line                                                     | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                               | Non-Notifiable Action | May 2026                     | 9.8                       | 83,468.16                                             | 0.00                                        | 0.00                                                  | 0.00                                            | 102,105.96                                             |
| Yarnima IPG1 Project Amendment                                   | Commenced                                    | Project does not meet the Notifiable Action Triggers.                                                               | Non-Notifiable Action | June 2026                    | 1.2                       | 83,466.96                                             | 0.00                                        | 0.00                                                  | 0.00                                            | 102,105.96                                             |
| Marillana Creek (Yandi)                                          | Not commenced during the reporting period.   | The Project meets the Notifiable Action Trigger for the Pilbara Olive Python.                                       | Validation Notice     | June 2026                    | 95.0                      | 83,371.96                                             | 0.00                                        | 0.00                                                  | 0.00                                            | 102,105.96                                             |

**Table 5-2 Total Clearing by Habitat Type to 30 June 2026 for all Validation Notices and Decision Reports**

| <b>Habitat Type</b>          | <b>Total clearing [ha] from<br/>July 2018 to June 2025</b> | <b>Total clearing [ha] for<br/>FY2026</b> | <b>Total clearing [ha] for the<br/>SEA from July 2018 to<br/>June 2026</b> |
|------------------------------|------------------------------------------------------------|-------------------------------------------|----------------------------------------------------------------------------|
| Breakaway/Cliff              | 0.07                                                       | 0.00                                      | 0.07                                                                       |
| Claypan                      | 2.21                                                       | 0.04                                      | 2.26                                                                       |
| Drainage Area and Floodplain | 678.80                                                     | 167.02                                    | 845.83                                                                     |
| Gorge and Gully              | 129.44                                                     | 11.24                                     | 140.68                                                                     |
| Hardpan Plain                | 15.15                                                      | 17.07                                     | 32.22                                                                      |
| Hillcrest/Hillslope          | 3,807.42                                                   | 384.50                                    | 4,191.91                                                                   |
| Major Drainage Line          | 23.95                                                      | 5.48                                      | 29.43                                                                      |
| Minor Drainage Line          | 580.58                                                     | 31.98                                     | 612.55                                                                     |
| Mulga Woodland               | 494.74                                                     | 146.44                                    | 641.18                                                                     |
| Sand Plain                   | 364.74                                                     | 60.35                                     | 425.10                                                                     |
| Stony Plain                  | 873.35                                                     | 84.23                                     | 957.58                                                                     |
| Undulating Low Hills         | 0.00                                                       | 0.04                                      | 0.04                                                                       |
| Unmapped                     | 14.79                                                      | 0.42                                      | 15.21                                                                      |
| <b>TOTAL</b>                 | <b>6,985.24</b>                                            | <b>908.82</b>                             | <b>7,894.06</b>                                                            |

## 6 Validation Notices

### 6.1 Mining Area C

Mining Area C is located approximately 100 kilometres (km) northwest of the town of Newman in the Pilbara region of Western Australia. The mine is situated within Mineral Lease 281SA (ML281SA) and Mineral Lease 249SA (ML249SA) and is operated by BHP in accordance with the *Iron Ore (Mount Goldsworthy) Agreement Act 1964*.

The *Mining Area C Validation Notice*, published in June 2018, covers the Mining Area C expansion and Southern Flank mining and infrastructure developments as set out in the notice.

During FY2026, mining at Mining Area C and South Flank Operations progressed in accordance with the WAIO Mining Plan. Activities included the commencement of new mining areas and pit pushbacks, while operations continued across multiple existing pits. Mining was completed in selected pits, enabling the start of backfilling and rehabilitation activities. Supporting infrastructure development also advanced, including haul road construction and expansion, ROM facility upgrades, and overburden storage area expansions to maintain ongoing production and operational efficiency.

The MAC-SF Offsets Management Plan (OMP; Version 0) was submitted to DCCEEW on 27 of June 2025 (with a subsequent revision on 7 July 2025), with approval in principle for the offset measures (feral cat control, ghost bat foraging habitat enhancement and artificial habitat research program) provided by letter on 18 July 2025. A subsequent revision to the OMP (Version 1, April 2026) was submitted to DCCEEW on 20 of April 2026. DCCEEW and BHP are working through the final details of the OMP with final approval anticipated in Q1 FY2027. Early-stage implementation of the OMP has progressed during FY2026.

#### 6.1.1 Validation Notice Deviations

There were no deviations from the Validation Notice during the FY2026 reporting period.

#### 6.1.2 Program Matter Monitoring and Outcomes

The monitoring required to be completed during the reporting period is outlined in Table 6-1. Monitoring results are discussed in the following sections.

**Table 6-1 Program Matter Monitoring Requirements for FY2026 Reporting Period**

| Species              | Monitoring                       | Parameter                                                                | Due Date                                                                                                                                          | Performance Targets                                                                                                                                                      | Performance Target Met                                                                                                      | Trigger Exceeded               | Trends of Concern                                                                                                                                                                      | Applicable Program Matter Outcome                                                                                                                                                        |
|----------------------|----------------------------------|--------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ghost Bat            | Land disturbance reconciliation  | Disturbance to Ghost Bat caves in the activity area during operations    | Annually                                                                                                                                          | No land disturbance within 50 m of 'to be retained High value ghost bat caves' or 'artificial ghost bat roosts'.                                                         | Yes<br><br>No disturbance has occurred on any 'high value retained' ghost bat caves or artificial ghost bat roosts          | No                             | No                                                                                                                                                                                     | No loss of Ghost Bat population/s as a result of Program activities.                                                                                                                     |
|                      |                                  |                                                                          |                                                                                                                                                   | No disturbance to any of the 'to be retained High value ghost bat caves' or 'artificial ghost bat roosts'.                                                               | Yes<br><br>No disturbance has occurred on any 'high value retained' ghost bat caves or artificial ghost bat roosts          | No                             | No                                                                                                                                                                                     |                                                                                                                                                                                          |
|                      |                                  |                                                                          |                                                                                                                                                   | No disturbance to any 'to be retained ghost bat cave' that renders it unsuitable ghost bat habitat.                                                                      | Yes<br><br>No disturbance has occurred on any 'to be retained ghost bat cave' that renders it unsuitable ghost bat habitat. | No                             | No                                                                                                                                                                                     |                                                                                                                                                                                          |
|                      | Ghost Bat viability and presence | Presence/absence of Ghost Bat                                            | July 2028 - Every 5 years during operations. BHP has implemented the annual Ghost Bat monitoring program pursuant to MS1072 Fauna Management Plan | Signs of Ghost Bat use in the 'to be retained' Ghost Bat caves or artificial roosts (if applicable) within the activity area, within 5 years of cessation of operations. | Yes                                                                                                                         | N/A (note: no trigger defined) | No<br><br>Annual monitoring has shown the ghost bat has persisted within the MS1072 development envelope (MAC-SF) and is still utilising the roosts previously known for this species. | No loss of Ghost Bat population/s as a result of Program activities.                                                                                                                     |
| Pilbara Olive Python | Land disturbance reconciliation  | Land disturbance of pools<br>Disturbance of Pilbara Olive Python habitat | Annually                                                                                                                                          | No unauthorised disturbance beyond the activity area                                                                                                                     | Yes<br><br>No disturbance beyond the Activity Area                                                                          | No                             | No                                                                                                                                                                                     | Program activities do not physically disturb or result in adverse changes to the hydrological regimes and/or water quality of the following waterholes: Weeli Wolli Spring, Ben's Oasis. |

| Species                | Monitoring                      | Parameter                                              | Due Date                                          | Performance Targets                                                                       | Performance Target Met                             | Trigger Exceeded               | Trends of Concern                                                                                                                                                                                                   | Applicable Program Matter Outcome                                                                                                                                                        |
|------------------------|---------------------------------|--------------------------------------------------------|---------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------------------------------------|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                        | Population monitoring           | Presence/absence of Pilbara Olive Python               | Five Yearly monitoring. Next survey due July 2028 | Presence of species consistent with baseline data.                                        | Yes                                                | No                             | No<br><br>There are eight records, previous records suggest a resident population exists within MS1072.                                                                                                             | No loss of Pilbara Olive Python population/s as a result of Program activities.                                                                                                          |
|                        | Hydrogeological monitoring      | Groundwater levels                                     | Annually                                          | Monitoring commenced 2 years prior to commencement of dewatering of the eastern deposits. | Yes                                                | No                             | No                                                                                                                                                                                                                  | Program activities do not physically disturb or result in adverse changes to the hydrological regimes and/or water quality of the following waterholes: Weeli Wolli Spring, Ben's Oasis. |
| Greater Bilby          | Land disturbance reconciliation | Disturbance to Greater Bilby habitat                   | Annually                                          | No unauthorised disturbance beyond the activity area                                      | Yes                                                | No                             | No                                                                                                                                                                                                                  | No loss of Greater Bilby population/s as a result of Program activities.                                                                                                                 |
|                        | Population Monitoring           | Presence/absence of Greater Bilby                      | Ten Yearly monitoring. Next survey due July 2028  | Presence of species consistent with baseline data.                                        | Yes                                                | N/A (note: no trigger defined) | No<br><br>There are no historical or recent records of Greater Bilby within the development envelope.                                                                                                               | No loss of Greater Bilby population/s as a result of Program activities.                                                                                                                 |
| Pilbara Leaf-nosed Bat | Land disturbance reconciliation | Disturbance to critical Pilbara Leaf-nosed Bat habitat | Annually                                          | No unauthorised disturbance beyond the activity area                                      | Yes<br><br>No disturbance beyond the Activity Area | No                             | No                                                                                                                                                                                                                  | No loss of Pilbara leaf-nosed bat population/s as a result of Program activities.                                                                                                        |
|                        | Population Monitoring           | Presence/absence of Pilbara Leaf-nosed Bat             | Ten Yearly monitoring. Next survey due July 2028  | Presence of species consistent with baseline data                                         | Yes                                                | N/A (note: no trigger defined) | No<br><br>No PLNB roosts are present so monitoring will only deduce if the species still forages in the area.<br><br>There have only been two previous records of foraging individuals within development envelope. | No loss of Pilbara leaf-nosed bat population/s as a result of Program activities.                                                                                                        |

| Species        | Monitoring                      | Parameter                                         | Due Date                                         | Performance Targets                                  | Performance Target Met                         | Trigger Exceeded               | Trends of Concern                                                                                                                                        | Applicable Program Matter Outcome                                                              |
|----------------|---------------------------------|---------------------------------------------------|--------------------------------------------------|------------------------------------------------------|------------------------------------------------|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| Northern Quoll | Land disturbance reconciliation | Disturbance to significant Northern Quoll habitat | Annually                                         | No unauthorised disturbance beyond the activity area | Yes<br>No disturbance beyond the Activity Area | No                             | No                                                                                                                                                       | No loss of Northern Quoll habitat that supports a population as a result of Program activities |
|                | Population Monitoring           | Presence/absence of Northern Quoll                | Ten Yearly monitoring. Next survey due July 2028 | Presence of species consistent with baseline data.   | Yes                                            | N/A (note: no trigger defined) | No<br>There are three records (two scats, one eDNA record) of the Northern Quoll within the development envelope - all deduced as transient individuals. | No loss of Northern Quoll population/s as a result of Program activities.                      |

### 6.1.3 Population Monitoring

Monitoring of Greater Bilby, Pilbara Olive Python, Leaf-Nosed Bat and Northern Quoll populations was not required during the reporting period as per the Validation Notice.

Based on the Ghost Bat survey conducted during the FY2026 reporting period and a review of the aerially captured spatial data, BHP considers that the following Program Matter Outcome has been achieved for the reporting period:

*No loss of Ghost Bat population/s as a result of Program activities; and*

*Loss of Ghost Bat habitat, including roosts, is offset by measures that maintain or enhance distribution and conservation status of the Ghost Bat.*

Details against each Program Matter Outcome are summarised below and in the Mining Area C – South Flank Offsets Management Plan section.

#### 6.1.3.1 Ghost Bat Monitoring

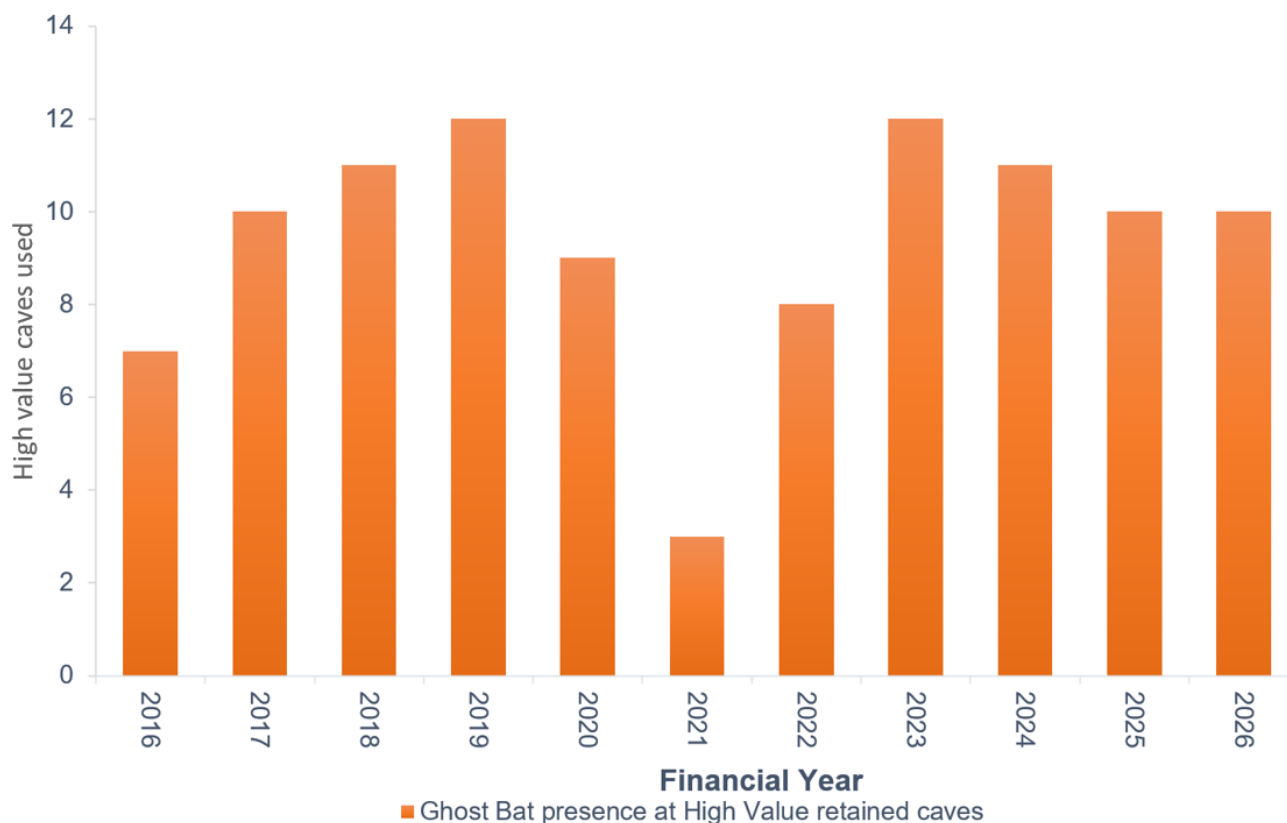
##### Sampling

During the reporting period, five field trips were undertaken as part of the bi-monthly Ghost Bat scat collection monitoring program to determine Ghost Bat viability and presence at high value retained caves, to fulfil the performance target of ‘signs of ghost bat use in the ‘to be retained’ ghost bat caves or artificial roosts’. Monitoring results from scat collection of caves ‘to be retained’ are presented in Table 6-2 below.

**Table 6-2 Bimonthly scat collection monitoring**

| Cave                 | Location    | Jul-25               |                     | Sep-25               |                     | Jan-26               |                     | Mar-26               |                     | May-26               |                     |
|----------------------|-------------|----------------------|---------------------|----------------------|---------------------|----------------------|---------------------|----------------------|---------------------|----------------------|---------------------|
|                      |             | No. of scats present | No. of bats present | No. of scats present | No. of bats present | No. of scats present | No. of bats present | No. of scats present | No. of bats present | No. of scats present | No. of bats present |
| Caves to be retained |             |                      |                     |                      |                     |                      |                     |                      |                     |                      |                     |
| AC1                  | North Flank | 0                    | 0                   | 70                   | 0                   | NE                   | 0                   | 600                  | 0                   | 0                    | 0                   |
| AC2                  | North Flank | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   |
| AC5                  | North Flank | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   |
| AC6                  | North Flank | NE                   | NE                  | NE                   | 0                   | NE                   | 0                   | NE                   | 0                   | 0                    | 0                   |
| AC8                  | North Flank | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   |
| AC9                  | North Flank | 2                    | 0                   | 0                    | 0                   | 4                    | 0                   | 2                    | 0                   | 0                    | 0                   |
| AC13                 | North Flank | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | NE                   | 0                   | 0                    | 0                   |
| AC14                 | South Flank | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 2                    | 0                   |
| AC17                 | South Flank | 9                    | 0                   | 250                  | 2                   | 0                    | 0                   | 0                    | 0                   | 2                    | 0                   |
| AC18                 | South Flank | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   |
| SF4                  | South Flank | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   |
| SF5                  | South Flank | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 2                    | 0                   | 0                    | 0                   |
| SF6                  | South Flank | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 70                   | 0                   |
| SF8                  | South Flank | 150                  | 0                   | 50                   | 0                   | 2                    | 0                   | 80                   | 0                   | 0                    | 0                   |
| SF14                 | South Flank | 3                    | 0                   | 1                    | 0                   | 4                    | 0                   | 9                    | 0                   | 0                    | 0                   |
| SF18                 | South Flank | 1                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 7                    | 0                   |
| SF26                 | South Flank | 0                    | 0                   | 0                    | 0                   | 1                    | 0                   | 6                    | 0                   | 0                    | 0                   |
| SF27                 | South Flank | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | NE                   | 0                   | 0                    | 0                   |
| AR01                 | North Flank | 0                    | 0                   | 0                    | 0                   | NE                   | 0                   | 0                    | 0                   | 0                    | 0                   |
| SF03                 | South Flank | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | NE                   | 0                   | 0                    | 0                   |
| SF09                 | South Flank | 0                    | 0                   | 0                    | 0                   | 1                    | 0                   | 0                    | 0                   | 9                    | 0                   |
| SF28                 | South Flank | 19                   | 0                   | 0                    | 0                   | NE                   | 0                   | NE                   | 0                   | 300                  | 0                   |
| SF30                 | South Flank | 0                    | 0                   | 3                    | 0                   | 0                    | 0                   | 150                  | 4                   | 0                    | 0                   |

Ghost Bat presence at High Value retained caves has observed a marginally decreasing trend over the reporting period but has remained consistent with 2025 presence numbers (Figure 6-1). Ghost bat presence in 2026 has overall remained relatively consistent since 2015, demonstrating that there has been no loss of Ghost Bat population as a result of the Program Activities.



**Figure 6-1 Ghost Bat presence at High Value retained caves in the Mining Area C Validation Notice**

#### 6.1.4 Pilbara Olive Python Hydrological Monitoring

Population monitoring was not required during the FY2026 reporting period for the Pilbara Olive Python, with the next scheduled survey due in July 2028. One Pilbara Olive Python was observed at the Packsaddle camp within the activity area during FY2026 reporting period.

In accordance with the Validation Notice, hydrological monitoring, including groundwater level monitoring was monitored during the FY2026 reporting period. During FY2026 groundwater level monitoring data was collected at the pathway and receptor bores for Weeli Wolli (Table 6-3) and Ben's Oasis (Table 6-4) to ensure activities from the Project do not physically disturb, or result in adverse changes to the hydrological regimes to support long-term persistence and viability of the Pilbara Olive Python.

There were no exceedances or non-compliances relating to trigger and threshold criteria associated with the BHP Central Pilbara Water Resource Management Plan Version 4.1 (BHP 2021) (CPWRMP), referenced in the Mining Area C Validation Notice.

Rainfall during the FY2026 reporting period (189.6 mm) was well below the long-term mean annual rainfall of 319.9 mm for the area, resulting in reduced regional groundwater recharge conditions.

Groundwater levels at Weeli Wolli Spring remained generally stable throughout FY2026, with only minor seasonal fluctuations observed across the receptor monitoring network (see Figure 6-2). Receptor bores GWB0016DM, GWB0016SM, GWB0018DM, GWB0018SM and GWB0032DM remained within historical ranges and showed changes of less than approximately 0.6 m over the reporting period. Early warning bores HEPX0001M and GWB0015M exhibited gradual declining trends; however, these trends are consistent with long-term regional groundwater patterns and are considered reflective of reduced recharge conditions and regional groundwater abstractions by third party operators rather than Project-related impacts.

At Ben's Oasis, groundwater levels exhibited gradual declines during FY2026 (see Figure 6-3). Water levels in receptor bore HDD0001M decreased by approximately 1.4 m over the reporting period, while early warning bores HDD0003M and HDD0004M both declined by approximately 1.8 m. These trends are consistent with reduced seasonal recharge during FY2026 and do not indicate a measurable impact attributable to Project activities.

In addition, groundwater quality monitoring undertaken during FY2026 demonstrated that water quality conditions within the Project area remained stable and within expected ranges. The monitoring results indicate that groundwater chemistry remains consistent with baseline conditions and continues to support the ecological values

associated with Pilbara Olive Python habitat. Accordingly, there is no evidence that Project activities have adversely affected groundwater quality at either receptor during FY2026.

Based on the monitoring undertaken during the FY2026 reporting period, BHP considers that the Program Matter Outcome has been achieved during the reporting period:

*Program activities do not physically disturb, or result in adverse changes to the hydrological regimes and/or water quality of the following waterholes: Weeli Wolli Spring, Ben's Oasis*

**Table 6-3 Groundwater levels for baseline understanding – Weeli Wolli Spring**

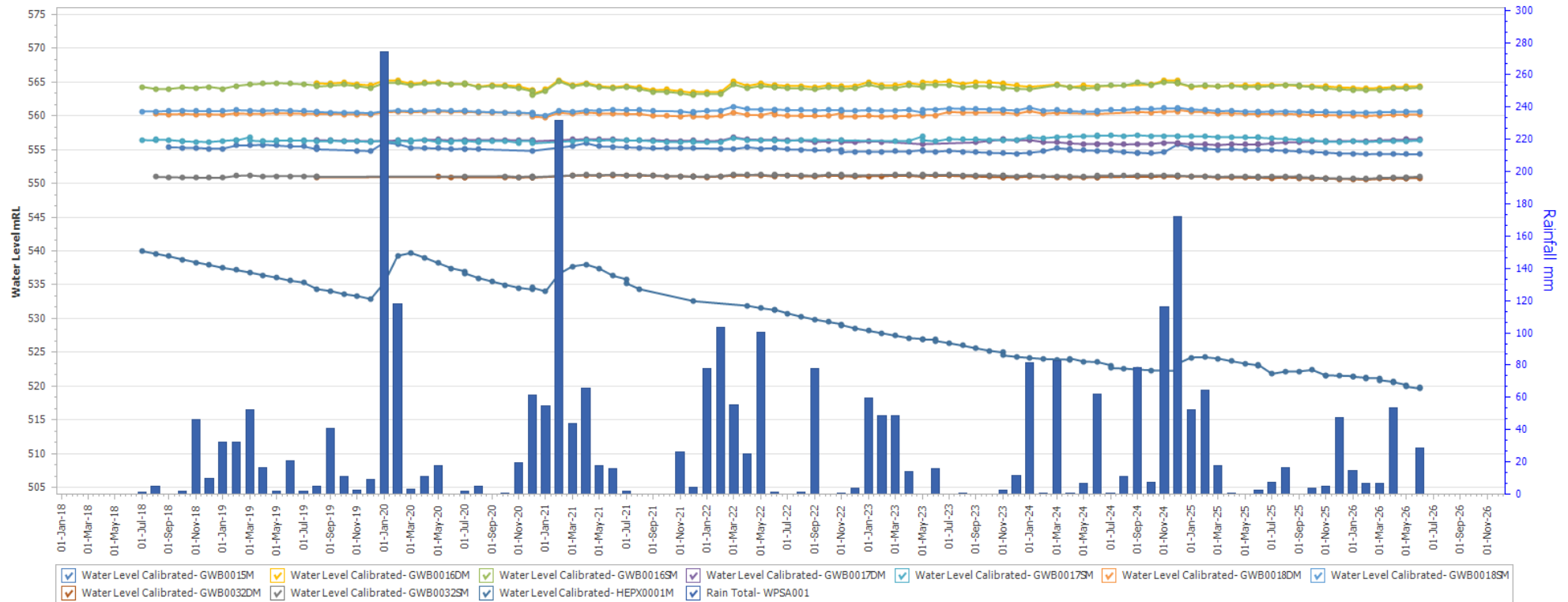
| Sample Point ID      | Weeli Wolli Springs |        |        |        |        |        |        |        |        |        |        |        |
|----------------------|---------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
|                      | FY2026 (mbgl)       |        |        |        |        |        |        |        |        |        |        |        |
|                      | Jul-25              | Aug-25 | Sep-25 | Oct-25 | Nov-25 | Dec-25 | Jan-26 | Feb-26 | Mar-26 | Apr-26 | May-26 | Jun-26 |
| <b>Early Warning</b> |                     |        |        |        |        |        |        |        |        |        |        |        |
| GWB0015M             | 23.84               | 23.93  | 24.02  | 24.16  | 24.22  | 24.32  | 24.36  | 24.32  | 24.35  | 24.40  | 23.84  | 24.38  |
| HEPX0001M            | 88.59               | 88.19  | 88.35  | 88.53  | 89.02  | 89.05  | 89.34  | 89.41  | 89.94  | 90.04  | 88.59  | 90.84  |
| <b>At Receptor</b>   |                     |        |        |        |        |        |        |        |        |        |        |        |
| GWB0016DM            | 4.73                | 4.73   | 4.76   | 4.89   | 4.82   | 4.99   | 5.09   | 5.09   | 5.16   | 5.09   | 4.93   | 4.88   |
| GWB0016SM            | 4.52                | 4.44   | 4.38   | 4.69   | 4.73   | 4.97   | 5.08   | 5.07   | 5.09   | 5.05   | 4.91   | 4.70   |
| GWB0017DM            | 3.58                | 3.42   | 3.31   | 3.24   | 3.14   | 3.18   | 3.10   | 3.08   | 3.07   | 2.94   | 2.88   | 2.84   |
| GWB0017SM            | 3.17                | 3.30   | 3.40   | 3.45   | 3.61   | 3.68   | 3.66   | 3.65   | 3.60   | 3.63   | 3.63   | 3.56   |
| GWB0018DM            | 7.68                | 7.67   | 7.72   | 7.79   | 7.84   | 7.87   | 7.87   | 7.88   | 7.90   | 7.88   | 7.76   | 7.28   |
| GWB0018SM            | 7.57                | 7.54   | 7.55   | 7.59   | 7.62   | 7.63   | 7.63   | 7.67   | 7.66   | 7.63   | 7.53   | 7.48   |
| GWB0032DM            | 5.33                | 5.22   | 5.31   | 5.38   | 5.40   | 5.49   | 5.49   | 5.55   | 5.44   | 5.39   | 5.33   | 5.30   |

**Table 6-4 Groundwater levels for baseline understanding – Ben's Oasis**

| Sample Point ID      | Ben's Oasis   |        |        |        |        |        |        |        |        |        |        |        |
|----------------------|---------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
|                      | FY2026 (mbgl) |        |        |        |        |        |        |        |        |        |        |        |
|                      | Jul-25        | Aug-25 | Sep-25 | Oct-25 | Nov-25 | Dec-25 | Jan-26 | Feb-26 | Mar-26 | Apr-26 | May-26 | Jun-26 |
| <b>Early Warning</b> |               |        |        |        |        |        |        |        |        |        |        |        |
| HDD0004M             | 39.85         | 40.01  | 40.27  | 40.48  | 40.72  | 40.87  | 41.04  | 41.18  | 41.32  | 41.42  | 41.43  | 41.61  |
| HDD0003M             | 45.75         | 45.94  | 46.08  | 46.24* | 46.41* | 46.60* | 46.76* | 46.92* | 47.12* | 47.33* | 47.50* | 47.60* |
| <b>At Receptor</b>   |               |        |        |        |        |        |        |        |        |        |        |        |
| HDD0001M             | 19.18         | 19.32  | 19.52  | 19.72  | 19.98  | 20.09  | 20.22  | 20.44  | 20.57  | 20.59  | 20.52  | 20.61  |

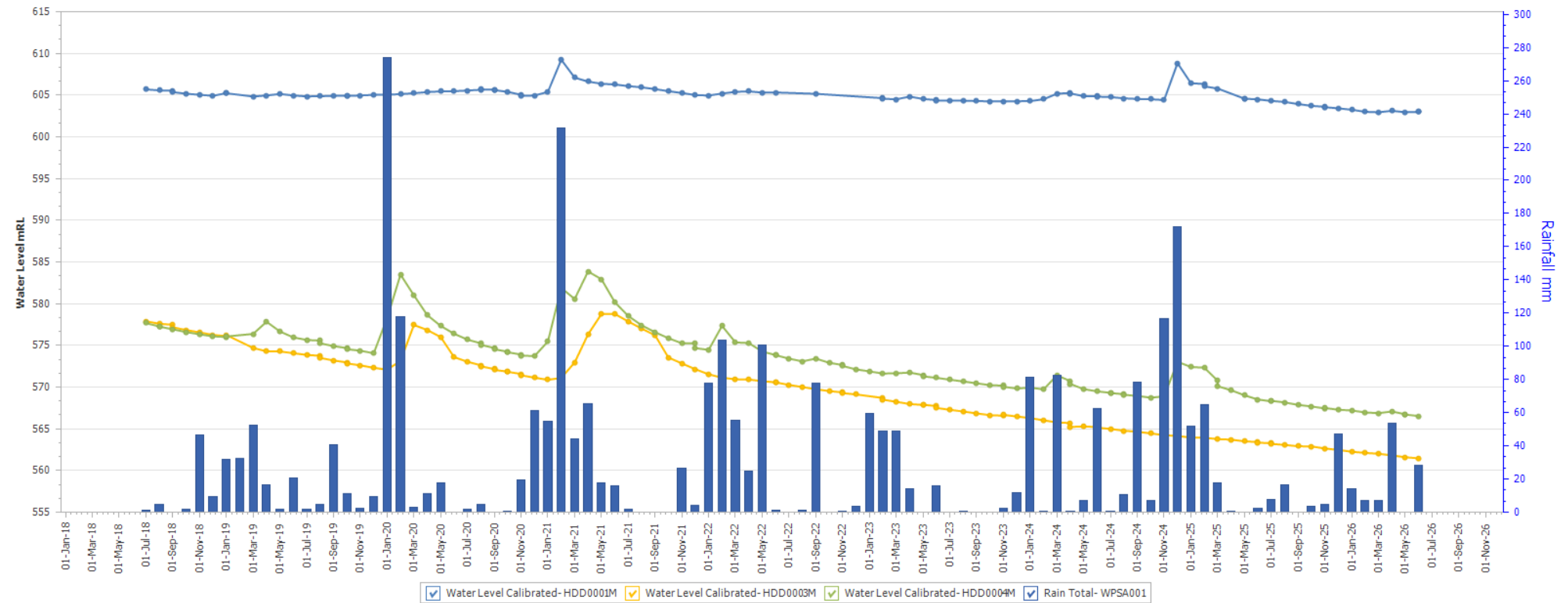
\* Manual dip

### MAC Weeli Wolli Water Levels



**Figure 6-2 Groundwater levels at Weeli Wolli Spring**

### MAC Bens Oasis Water Levels



**Figure 6-3 Groundwater levels at Ben's Oasis**

### 6.1.5 Management Commitments

#### Central Pilbara Land Management Plan

In June 2025 the Department of Climate Change, Energy, the Environment and Water provided in principle approval for the MAC-South Flank Offsets Management Plan to supersede and encompass the commitments of the Central Pilbara Land Management Plan commitments. Note that from FY2027 onwards, the CPLMP commitments will not be reported on.

#### Feral animal control (targeting cats)

Feral cat trapping was implemented during the reporting period. Sporadic sightings were noted throughout operational areas and traps/cages were deployed to trap cats in known areas. A total of three feral cats were trapped in the reporting period. All three were taken to the Shire of East Pilbara Ranger depot.

#### Fire control/management

BHP has conducted controlled back burning during the reporting period. Bushfire permits have been obtained from the Shire of East Pilbara during this time to set fire to bushland for the purpose of fuel reduction in the development envelope.

#### Removal and/or replacement of barbed wire fencing

Barbed wire fence removal was conducted in FY2026.

#### Remove cattle from newly excised land from pastoral leases and construction of exclusion fencing (where applicable)

No updates during the reporting period.

#### Exclusion fencing around waterholes

No updates during the reporting period.

### 6.1.6 Offsets

BHP has prepared the MAC-South Flank Offsets Management Plan (OMP) to address residual impacts identified in the MAC-South Flank Validation Notice. DCCEEW has agreed in-principle to the two proposed direct offset projects – Feral Cat Control, Ghost Bat Foraging Habitat Enhancement, and two supporting research projects - Ghost Bat Artificial Habitat Research and Ghost Bat Habitat Use and Population Dynamics. The specific details of the design, planning and implementation of these projects is outlined in the OMP, which is currently in the final phase of approval by DCCEEW.

Formal monitoring and compliance reporting under the OMP is planned to commence in FY2027, subject to final approval of the OMP by DCCEEW. During FY2026, BHP has been progressing the planning, design and early-stage implementation of the four projects in the OMP as summarised below and has completed the construction of two new artificial roosts at South Flank.

No offsets invoice was received during the reporting period.

#### Feral Cat Control

- Four Felixer cat grooming traps were deployed in the development envelope during the reporting period. The locations were selection based on feral cat observations over a period of time. BHP is in the process of applying for the 1080 licence, so feral cat control via this method can commence during FY2027.
- The planning and design of the baseline surveys for ghost bats, feral predators and ghost bat prey species has progressed during FY2026, with implementation planned to occur during FY2027.
- Planning has progressed with the Department of Biodiversity, Conservation and Attractions (DBCA) for the delivery of an aerial cat baiting program within the offset area in CY2027. The proposed baiting program is subject to further consultation with stakeholders (including Traditional Owners) and approval by DBCA during FY2027.

#### Ghost Bat Foraging Habitat Enhancement Project

- The planning for the ghost bat habitat foraging enhancement project has progressed during FY2026, including a reconnaissance field survey completed to inform the scope and design of the baseline field survey program planned for FY2027.

### **Ghost Bat Habitat Use and Population Dynamics Research Project**

- The Ghost Bat Habitat Use and Population Dynamics Research Project has formally been initiated in FY2026, with a joint research agreement established between BHP and DBCA and early-stage planning and project design underway.

### **Ghost Bat Artificial Habitat Research Project**

This research project is being undertaken by Curtin University and focuses on improving artificial roost design, understanding habitat requirements, and supporting long-term population sustainability for Ghost Bats in the Pilbara. Key achievements of the project during FY2026 include:

- Artificial Roost Design Optimisation.
- Completion of a roost furniture preference trial with captive ghost bat colonies at Perth Zoo and Caversham Wildlife Park.
- Testing of various roost surface treatments to identify preferred hanging and roosting substrates for incorporation into future artificial roost designs.
- Data collection has been completed by the team, and the analysis of results is underway.
- Best-Practice Artificial Roost Guidelines.
- A scientific manuscript has been drafted to consolidate lessons learned from previous artificial roost projects across the Pilbara.
- The publication will provide the first comprehensive best-practice guidelines for ghost bat artificial roost design and implementation.
- The work is being developed through collaboration between mining companies, ecological consultants, and academic researchers, with publication anticipated in FY2027.
- Establishment of a Fauna Habitat Research Group.
- Curtin University has established the Fauna Habitat Research Group through an ARC Early Career Industry Fellowship.
- The program is supported by BHP and several major Pilbara mining companies.
- Research activities include ghost bat conservation and artificial habitat optimisation for multiple native vertebrate species.

### **MAC-South Flank Artificial Ghost Bat Roosts**

- Two new ghost bat artificial roosts have now been completed by BHP at MAC-South Flank during FY2026 (Figure 6-4 to Figure 6-6).
- The artificial roosts were designed through the collaboration of a diverse range of subject matter experts, each contributing their unique skills and knowledge towards the shared goal of achieving successful ghost bat colonisation.
- A key design objective was to replicate important natural roost characteristics, including maintaining a stable, elevated temperature and humidity microclimate suitable for ghost bats.
- Monitoring of the roosts has recently commenced, with the objective of understanding and assessing the effectiveness of these artificial structures over time.



**Figure 6-4 Completed Artificial Ghost Bat Roost (South Flank)**



**Figure 6-5 Completed Artificial Ghost Bat Roost (South Flank)**



**Figure 6-6 Entrance & Internal Roof Design of Artificial Ghost Bat Roost (South Flank)**

#### **6.1.7 Land Disturbance Reconciliation**

Disturbance undertaken during the reporting period under the Mining Area C Validation Notice is detailed in Table 6-5. The disturbance of habitats for all the Program Matters is shown in Map 6-1 and Map 6-2.

No disturbance has been undertaken at Weeli Wolli Spring or Ben's Oasis by BHP. Based on the disturbance and monitoring undertaken during the FY2026 reporting period, BHP considers that the following Program Matter Outcome has been achieved during the FY2026 reporting period:

*Program activities do not physically disturb, or result in adverse changes to the hydrological regimes and/or water quality of the following waterholes: Weeli Wolli Spring, Ben's Oasis;*

The gorge and gully habitats do not support a high-density population of Northern Quolls at Mining Area C. BHP considers that the following Program Matter Outcome has been achieved during the FY2026 reporting period:

*No loss of Northern Quoll habitat that supports a high-density population as a result of Program activities;*

No land disturbance has occurred within 50 m of the retained high value ghost bat caves or artificial Ghost Bat roosts during the reporting period (Figure 7.3). BHP considers that the following performance targets in the Mining Area C Validation Notice have been achieved for the FY2026 reporting period:

*No land disturbance within 50 m of 'to be retained High value ghost bat caves' or 'artificial ghost bat roosts'.*

*No disturbance to any of the 'to be retained High value ghost bat caves' or 'artificial ghost bat roosts'.*

*No disturbance to any 'to be retained ghost bat cave' that renders it unsuitable ghost bat habitat.*

No land disturbance has occurred outside of the activity area (Map 6-1) and disturbance to habitats for each Program Matter remains below the impacts described in the Mining Area C Validation Notice (Table 6-5). BHP considers that the following performance target in the Mining Area C Validation Notice for the Greater Bilby, Pilbara Olive Python and Northern Quoll have been achieved for the FY2025 reporting period:

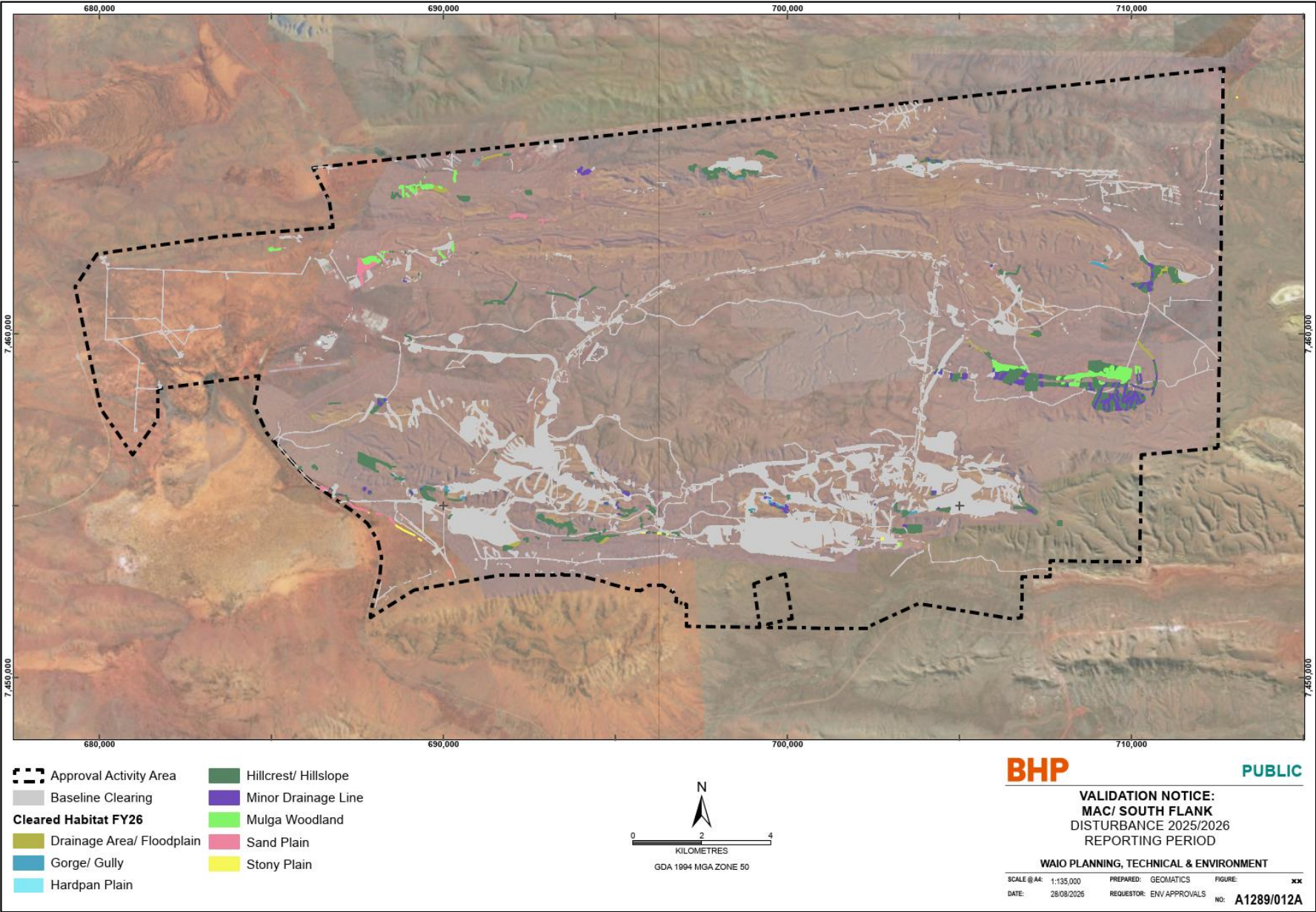
*No unauthorised disturbance beyond the activity area.*

All disturbance to habitats for each Program Matter remain below the impacts predicted during the Validation Process (Table 6-5).

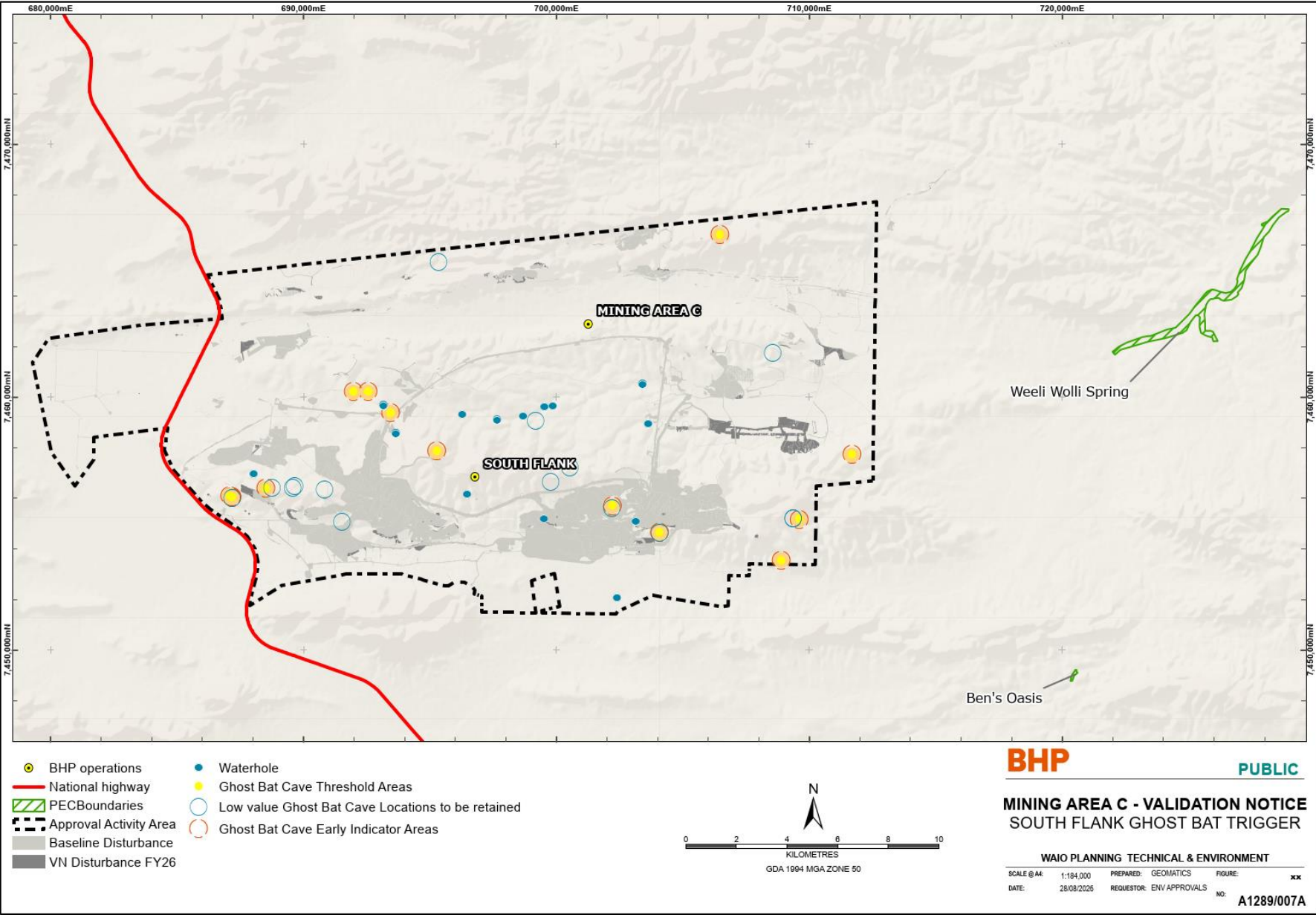
**Table 6-5 Mining Area C Disturbance by habitat type**

| Habitat                       | Activity disturbance<br>July 2025 to June 2026 (ha) | Total Disturbance from<br>July 2018 to June 2026 (ha)                    | Total Predicted<br>Disturbance (ha) |
|-------------------------------|-----------------------------------------------------|--------------------------------------------------------------------------|-------------------------------------|
| <b>Ghost Bat</b>              |                                                     |                                                                          |                                     |
| Foraging Habitat <sup>1</sup> | 324.40                                              | 4,978.24                                                                 | 14,502                              |
| Ghost Bat Caves               | Nil                                                 | Five caves<br>(2019: SF22, 2020: SF15, 2024:<br>AC3 and AC11 2025: SF01) | Thirty-six caves (impact)           |
| <b>Pilbara Olive Python</b>   |                                                     |                                                                          |                                     |
| Gorge/Gully                   | 11.14                                               | 140.09                                                                   | 1,123                               |
| Major Drainage                | 0.51                                                | 0.51                                                                     | 2                                   |
| <i>Total</i>                  | <i>11.65</i>                                        | <i>140.60</i>                                                            | <i>1,125</i>                        |
| <b>Greater Bilby</b>          |                                                     |                                                                          |                                     |
| Sand Plain                    | 12.52                                               | 147.71                                                                   | 236                                 |
| <b>Pilbara Leaf-nosed Bat</b> |                                                     |                                                                          |                                     |
| Gorge/Gully                   | 11.14                                               | 140.09                                                                   | 1,123                               |
| <b>Northern Quoll</b>         |                                                     |                                                                          |                                     |
| Gorge/Gully                   | 11.14                                               | 140.09                                                                   | 1,123                               |

<sup>1</sup> Ghost Bat foraging habitat is based on a buffer of 4 km applied to high value roosts as per Area B outlined in Ministerial Statement 1072.



Map 6-1 Mining Area C VN Habitat Disturbance FY2026



Map 6-2 Mining Area C Ghost Bat Caves and Disturbance

## 6.2 Jimblebar Optimisation Project

Existing mining operations at Jimblebar are located approximately 40 km east of the town of Newman. Existing mining operations include above and below water table mining of open iron ore pits, overburden storage areas and the operation of associated mine, processing and rail infrastructure. Groundwater is abstracted for water supply and to dewater the orebodies.

Surplus water is managed through several methods:

- Transfer to Ophthalmia Dam,
- Controlled creek discharge to Jimblebar Creek and Caramulla Creek,
- MAR at Orebody 18 and Caramulla.

The Jimblebar Optimisation Project Validation Notice (May 2020) came into effect on the 8 June 2020.

No activities occurred under the Jimblebar Optimisation Project Validation Notice (May 2020) in the reporting period.

## 6.3 Revised Jimblebar Optimisation Project Validation Notice

BHP prepared the Revised Jimblebar Optimisation Project Validation Notice (2023) to update offset commitments and identify additional disturbance required for new activities and infrastructure. The revised scope included:

- a solar project,
- Jimblebar enabling works for future beneficiation,
- train load out replacement,
- communications,
- Jimblebar East enabling works.

The Revised Jimblebar Optimisation Project Validation Notice did not reassess or alter the activities described in the original Validation Notice. It was published on 24 August 2023 and came into effect on 25 September 2023.

The following section reports on the reporting period from 1 July 2025 to 30 June 2026. The Revised Validation Notice authorises clearing of up to 1,042 ha, in addition to the 2,000 ha of clearing previously authorised in the original Jimblebar Optimisation Validation Notice (2020).

### 6.3.1 Validation Notice Deviations

There were no deviations from the Validation Notice during the FY2026 reporting period.

### 6.3.2 Program Matter Monitoring and Outcomes

Monitoring requirements for the reporting period are outlined in Table 6-6. Results from the Ghost Bat monitoring program are discussed in Section 6.3.3.1.

**Table 6-6 Program Matter Monitoring Requirements for the Reporting Period**

| Species   | Monitoring                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Parameters             | Timing                                | Performance Targets                                                                                         | Performance Target Met | Trigger Exceeded | Trends of Concern                                                                                                                                               | Applicable Program Matter Outcome                                            |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|---------------------------------------|-------------------------------------------------------------------------------------------------------------|------------------------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| Ghost Bat | <p>Monitoring Ghost Bat presence and usage of the Activity Area.</p> <p>Proposed monitoring includes:</p> <ul style="list-style-type: none"> <li>Category 2 roosts (CJIM-03 and CNIN-03*) at least 6 monthly</li> <li>Category 3 roosts (CNIN-01, CNIN-13, CJIM-09) at least yearly</li> <li>Category 4 roosts (CJIM-01, CJIM-05, CJIM-06, CJIM-08, CJIM15, CJIM17, CJIM-20**, at least two yearly</li> </ul> <p><i>(Monitoring subject to safe access, heritage and tenure restrictions).</i></p> | Presence of Ghost Bat. | Six monthly to two yearly monitoring. | Presence or evidence of presence of Ghost Bat at one or more Ghost Bat roosts over two years of monitoring. | Yes                    | N/A              | <p>No.</p> <p>Monitoring data does not raise any immediate concerns of impacts to local population. trends will be assessed as part of the Ten-year Review.</p> | No loss (or maintain) Ghost Bat colony(s) as a result of Program activities. |

\* Note: During the Validation Notice review completed in August 2023, there was an administrative error and CNIN-01 should be CNIN-03 (category 2 roost).

\*\* Note: As of February 2025, roost CJIM-20 is unable to be monitored due to access constraints to this cave due to heritage restrictions. This cave was last visited in April 2024 and was removed from monitoring program in the April 2025 update of the Terrestrial Fauna EMP.

### 6.3.3 Population Monitoring

Based on the Ghost Bat monitoring conducted during the reporting period, BHP considers that the Project Matter Outcomes have been achieved:

*Minimise loss of critical and supporting habitats of the Ghost Bat as a result of Program Activities within the SAA*

*No loss (or maintain) Ghost Bat colony(s) as a result of program activities*

Ghost Bat monitoring results are discussed in the following sections.

#### 6.3.3.1 Ghost Bat Monitoring

##### Sampling

In FY2026, four field trips were undertaken to assess the presence or absence of Ghost Bats in caves located within or adjacent to the Activity Area, in accordance with the monitoring conditions outlined in the Revised Validation Notice.

**Table 6-7 Jimblebar caves monitored during the reporting period**

| Cave ID  | Roost Type  | Visitation Frequency | July 2025 | Sept 2025 | Jan 2026 | Feb 2026 |
|----------|-------------|----------------------|-----------|-----------|----------|----------|
| CJIM-01  | Category 4  | Two yearly           |           | ✓         |          |          |
| CJIM-03  | Category 3* | Yearly*              | ✓         | ✓         |          | ✓        |
| CJIM-05  | Category 2* | Six monthly*         | ✓         | ✓         |          | ✓        |
| CJIM-06  | Category 4  | Two yearly           | ✓         |           |          |          |
| CJIM-08  | Category 4  | Two yearly           | ✓         |           |          |          |
| CJIM-09  | Category 3  | Yearly               | ✓         | ✓         |          | ✓        |
| CJIM-15  | Category 4  | Two yearly           | ✓         |           |          |          |
| CJIM-17  | Category 4  | Two yearly           | ✓         |           |          |          |
| CJIM-20^ | Category 4  | Not monitored        | -         | -         | -        | -        |
| CNIN-01  | Category 3* | Yearly               | ✓         | ✓         |          | ✓        |
| CNIN-03  | Category 2  | Six monthly          | ✓         | ✓         |          | ✓        |
| CNIN-13  | Category 3  | Yearly               | ✓         |           | ✓        | ✓        |

\* Biologic recommended changes to the following cave categories based on further data:

CJIM-03 changed to Category 3 from Category 2 (Biologic 2026)

CJIM-05 changed from Category 4 to Category 3 (Biologic 2026)

CNIN-01 was upgraded to Category 2 from Category 3 (Biologic in prep)

^ CJIM-20 was not visited and is no longer included within the monitoring program on request of the Traditional Owners.

##### July 2025

During field trip one (14 to 19 July 2026):

- Ten out of the twelve caves were visited.
- Ghost Bat scat was collected at CNIN-01; and
- No Ghost Bat individuals were observed during the field trip.

##### September 2025

During field trip two (25 to 29 September 2025):

- Six out of the twelve caves were visited.
- Ghost Bat scat was collected at CNIN-01; and
- No Ghost Bat individuals were observed during the field trip.

##### January 2026

During field trip three (20 to 22 January 2026), one of the twelve caves was visited and no scats were collected, or Ghost Bats observed during the field trip.

##### February 2026

During field trip four (23 to 27 February), six of the twelve caves were visited and no scats were collected, or Ghost Bats observed during the field trip.

##### Ultrasonic recordings

Bat call detection via ultrasonic monitoring was conducted across several caves during the FY2026 reporting period. Analysis of the acoustic data confirmed the following Ghost Bat call detections at:

- CJIM-05 in July 2025
- CNIN-03 in July, August and September 2025.

Additional ultrasonic data has been collected and is currently undergoing analysis concurrent with the preparation of this report.

#### 6.3.4 Management Commitments

An update on the management commitments is outlined below.

##### Implement feral cat management

Opportunistic sightings of feral cats are reported to the Site Environmental Specialist and/or documented in the BHP Event Management System. No feral cat sightings were formally reported during FY2026. A QR code reporting form will be rolled out across site in FY2027 to improve reporting of feral cat sightings.

A feral cat monitoring program was commenced across Jimblebar in FY2026, which included monitoring of feral cat presence near high value Ghost Bat roosts. Motion activated cameras were deployed during FY2026 at the entrances of the following caves: CJIM-03, CNIN-03, CNIN-09 and CNIN-12. Results of the FY2026 monitoring program are being prepared and will be further discussed in the next reporting period. Insights will inform strategic management approaches to reduce the threat of feral cats in current and future developments.

BHP has secured two *Felixer* grooming traps for targeted feral cat control during FY2027, with the units planned to be deployed at the entrance to Ghost Bat caves (caves to be determined in FY2027). BHP will implement a wider feral cat control program to target feral cats across its tenure in FY2027.

##### Implement fire management

Fire risk is managed through multiple controls across Jimblebar:

- Hot work management procedures are enforced via the BHP permitting system to ensure that any hot works across site complies with the BHP procedures and standards.
- Fire breaks are maintained around powerline corridors, water pipelines, conveyors, and infrastructure. These are managed through scheduled work orders occurring every six to twelve months.
- Designated smoking areas are available at crib huts and administrative buildings to ensure smoking is contained to specified areas and to reduce the risk of fire threats across site.

##### Restrict barbed wire usage

Barbed wire has been limited onsite to areas where required by legislation (i.e. around the Ammonium Nitrate Fuel Oil (ANFO) facility). Conditions are also applied through the GLUP system to ensure that barbed wire is avoided, and where it is required to be used, only single strand barbed wire is used, with bat deflectors installed to deter Ghost Bats.

##### Restrict human access to high value Ghost Bat caves

High value bat caves have been identified within the company's spatial systems which are utilised for the internal GLUP permits. Buffers application to high value bat caves are recorded in these systems and have been excluded from all permits, in accordance with the avoidance commitments made in the Validation Notice. Other than for monitoring no human access occurred other than for monitoring during the reporting period as these restrictions are defined in the company's internal land use permitting system and therefore no works have been permitted within the areas.

Monitoring of Ghost Bat caves was completed outside of the Ghost Bat breeding season (October to January) in FY2026. WAIO also conducted trials of real-time remote bat monitoring systems in 2026, which may enable monitoring with reduced cave access.

#### 6.3.5 Offsets

An advanced ten percent payment of the estimated total offset amount for the Revised Jimblebar Optimisation Project Validation Notice was contributed to the PEOF in October 2023.

The first biennial reporting period and offset payment was triggered in FY2025 through the submission of the Revised Jimblebar Optimisation Project Validation Notice Impact Reconciliation Report (IRR). At the time of the preparation of this annual report, the invoice has not been received for payment from PEOF. The next IRR and associated offset payment will be submitted to PEOF at the end of the current biannual reporting period, in FY28.

Implementation and achievements of offset programs undertaken by PEOF are available on the [PEOF website](#).

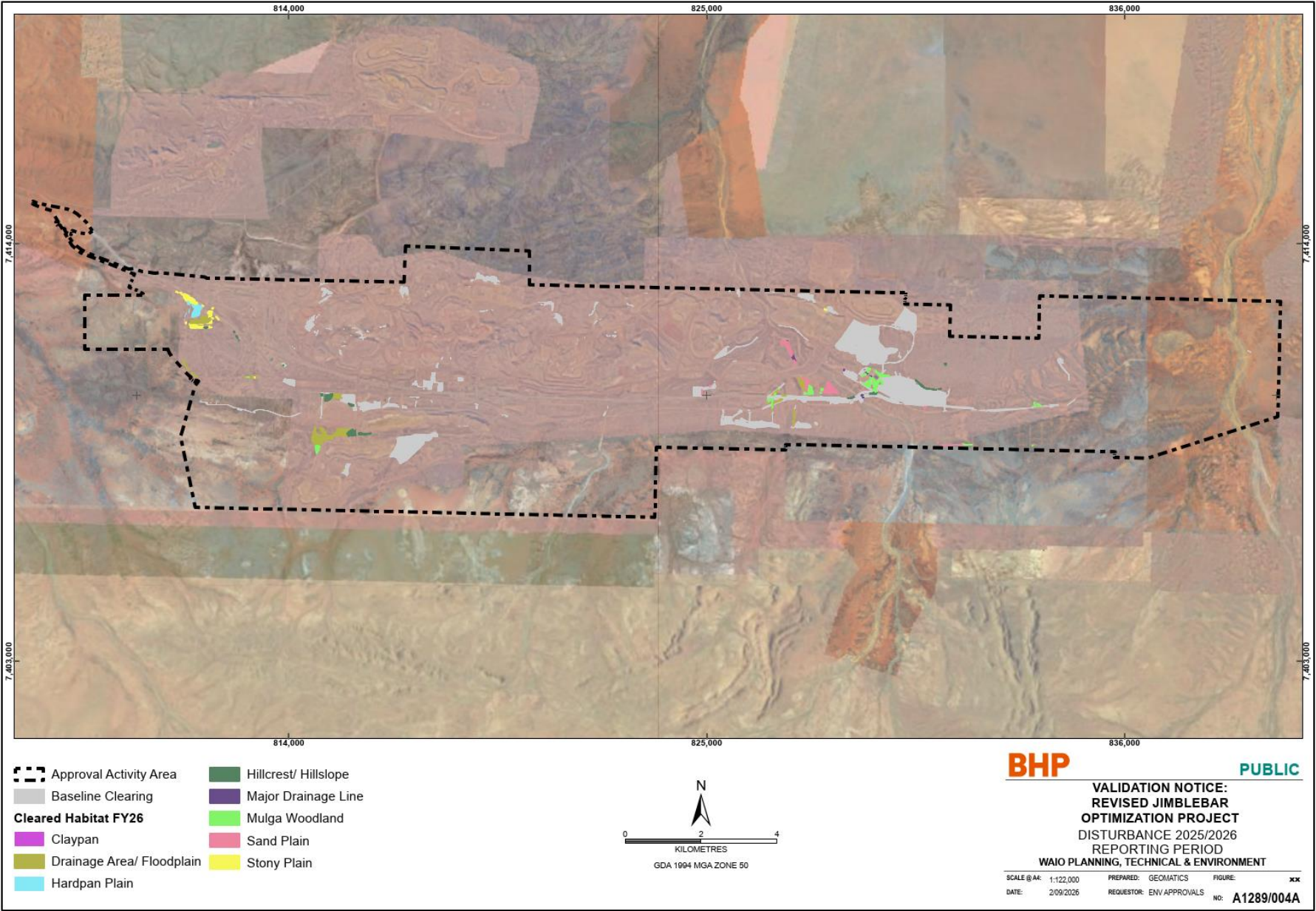
### 6.3.6 Land Disturbance Reconciliation

The disturbance during the reporting period to critical roosting and critical foraging habitats associated with Ghost Bats is detailed in Table 6-8. The Total Predicted Disturbance (ha) is the combined total approved via the previous Jimblebar Optimisation Project Validation Notice and the Revised Jimblebar Optimisation Project Validation Notice.

During the reporting period, no Category 3 or 4 roosts within the Activity Area were cleared.

**Table 6-8 Jimblebar Optimisation Project Revised Validation Notice Disturbance by habitat type**

| Habitat                          | Activity disturbance July 2025 to June 2026 (ha) | Total disturbance as of 30 June 2026 (ha) | Total Predicted Disturbance (ha) |
|----------------------------------|--------------------------------------------------|-------------------------------------------|----------------------------------|
| <b>Ghost Bat</b>                 |                                                  |                                           |                                  |
| <b>Critical roosting habitat</b> |                                                  |                                           |                                  |
| Gorge and Gully                  | 0.00                                             | 0.00                                      | <1 ha                            |
| <b>Critical foraging habitat</b> |                                                  |                                           |                                  |
| Major Drainage Line              | 1.10                                             | 18.52                                     | 233                              |
| Minor drainage line              | 0.00                                             | 18.52                                     | 12                               |
| Mulga Woodland                   | 9.08                                             | 132.56                                    | 1,465                            |
| Drainage Area/Flood Plain        | 28.24                                            | 70.73                                     | 335                              |
| Sand Plain                       | 13.92                                            | 66.61                                     | 407                              |
| Stony Plain                      | 7.55                                             | 8.17                                      | 160                              |
| <b>Total</b>                     | <b>59.89</b>                                     | <b>315.11</b>                             | <b>2,612</b>                     |



**Map 6-3**      **Revised Jimblebar Validation Notice - Habitat Disturbance FY2026**

## 6.4 Mooka Rail Siding

The Mooka Rail Works are located approximately 22 km south of the town of Port Hedland, adjacent to BHP's Newman Main Rail Line in the Pilbara region of Western Australia. This rail line is a critical component of the WAIO Supply Chain, connecting BHP's Iron Ore mines at Newman, Jimblebar, Eastern Ridge, Yandi and Mining Area C with Port Hedland, where it is exported via the Nelson Point and Finucane Island facilities.

The Mooka Rail Works are completed to upgrade existing rail infrastructure and ancillary facilities along a section of the Newman Rail Line known as 'Mooka'.

The activities included:

- Construction of five new rail sidings (low-speed track sections) totalling approximately 5 km.
- Re-alignment of an existing rail siding, including tie-ins.
- Construction of level crossings, access roads, derailleurs, signalling infrastructure and on-tracking points.
- Construction and relocation of supporting infrastructure and underground service.
- Geotechnical works.
- Decommissioning and closure of redundant infrastructure.

In April 2023, BHP submitted the Mooka Rail Siding Validation Notice for public consultation. The Validation Notice was published on 14 June 2023 and came into effect from 4 July 2023.

The Validation Notice was required due to the Notifiable Action trigger being met for the Northern Quoll, with numerous records of the species adjacent to and within the Activity Area.

The Mooka Rail Works Activity commenced as planned in August 2023. During the reporting period, the majority of bulk earthworks and civil construction works were completed.

### 6.4.1 Validation Notice Deviations

No exceedances or deviations from the Mooka Rail Works Validation Notice were identified during the reporting period.

### 6.4.2 Program Matter Monitoring and Outcomes

Monitoring activities required during the reporting period are detailed in Table 6-9. Results from these monitoring programs are discussed in the following sections.

**Table 6-9 Program Matter Monitoring Requirements for FY2026 Reporting Period**

| Species        | Monitoring                                                                                                                                                                                                                   | Parameters                                | Timing                                  | Performance Targets                                                                       | Performance Target Met | Trigger Exceeded | Trends of Concern                                                                                                                                                                                                                                                                                                                                     | Applicable Program Matter Outcome                                                                                                                                                                                             |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|-----------------------------------------|-------------------------------------------------------------------------------------------|------------------------|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Northern Quoll | Biannual monitoring at Sites Quarry 1 (Q1), Quarry 1 Control (Q1C), Quarry 2 (Q2) and Quarry 2 Control (Q2C). Monitoring to be undertaken twice a year. Techniques will include motion camera footage and targeted searches. | Presence or evidence of individuals       | Six monthly monitoring.                 | Presence or evidence of Northern Quoll at one or more sites over two years of monitoring. | Yes                    | No               | No<br><br>Northern Quoll populations have continued to remain low, consistent with the observations at control sites. The trend overall has shown a decline in quoll population attributed to successive years of below average rainfall however BHP's operations have not contributed to a decline in the quoll population within the approval area. | Minimise loss of critical and supporting habitats of the Northern Quoll as a result of Program Activities within the SAA,<br><br>AND<br><br>No loss (or maintain) Northern Quoll colony(s) as a result of program activities. |
|                | Land disturbance reconciliation                                                                                                                                                                                              | Clearing does not exceed 23 ha Sand Plain | Annual land disturbance reconciliation. | No unauthorised disturbance beyond the Activity Area.                                     | Yes                    | No               | No                                                                                                                                                                                                                                                                                                                                                    | No loss of Northern Quoll habitat that supports a high density population as a result of Program activities                                                                                                                   |

### 6.4.3 Population Monitoring

Monitoring of Northern Quoll populations was undertaken during the reporting period, in accordance with the requirements of the Validation Notice.

Based on the results of monitoring conducted during the reporting period, BHP considers that the following Program Matter Outcomes have been achieved:

*Minimise loss of critical and supporting habitats of the Northern Quoll as a result of Program Activities within the SAA.*

*No loss (or maintain) Northern Quoll colony(s) as a result of program activities.*

Monitoring results for the Northern Quoll are discussed in the following sections.

#### 6.4.3.1 Northern Quoll Monitoring

##### Methodology

Surveys were undertaken at the four sites:

- Two impact sites: Quarry 1 (Q1) and Quarry 2 (Q2).
- Two control sites: Quarry 1 Control (Q1C) and Quarry 2 Control (Q2C).

During FY2026, two monitoring surveys were undertaken at four sites:

- post-dry season (November 2025),
- post-wet season (May 2026), (coinciding with male dispersal and the start of the breeding season).

The data collected is an estimate of individuals at each site, which will ultimately test the abundance of the Northern Quoll between the Quarry and Control sites (refer to Table 6-10).

Five long-term motion cameras were installed at each site for four weeks per season. An additional five cameras targeting feral predator species (Feral cat, Dingo and Red Fox) were installed at each site for four weeks, repeated bi-annually concurrently with the Northern Quoll monitoring. Cameras were focussed on tracks and areas that feral predators are more likely to utilise.

Additionally, active searches were conducted for any secondary evidence of Northern Quoll and feral predators. This included searching for tracks, remains, or scats, with any evidence of presence recorded.

Motion camera images were assessed with all recorded vertebrate fauna identified to species level where possible. Northern Quolls were individually identified based on the site, time and date of images captured, and their unique spot markings. Feral predators were also identified.

An estimation of Northern Quoll and feral predator abundance was measured by identifying the number of individuals recorded at each site.

##### Results

Monitoring in 2026 recorded nine Northern Quoll present at two of the four sites (Q2 & Q2C), eight of these were recorded from one Quarry site (Q2). No individuals were recorded from Quarry 1 (Q1) or the Quarry 1 Control (Q1C) for this monitoring year. Eight individuals were recorded at Quarry 2 (Q2), with a single individual recorded over two events. One Northern Quoll was detected at Quarry 2 Control (Q2C) post-wet (Table 6-11).

Individual Northern Quolls were identified from a total of 2,838 motion camera trap nights over the two monitoring events. Site Q2 recorded the highest number of individuals (eight) identified from 73 motion camera triggers. Individual NQ4 recorded at site Q2, was recorded most frequently (a total of 6 times over 5 nights).

Records in 2026 (n=9) slightly increased from the 2025 results, with an additional one individual recorded. Numbers are stable based on the 2026 records. However, the decline overall was recorded across the Quarry sites as well as the Control sites. Quarry site records reduced from 15 individuals in 2023 to 13 individuals in 2024 to seven individuals in 2025 and have stayed stable in 2026. The Control site records declined similarly from four individuals in 2023 to two individuals in 2024 to one individual in 2025 and stayed stable in 2026 (Table 6-11).

As the declines were seen at both the control and impact sites this may indicate that this is a natural population variability. Additionally, climate factors such as lower rainfall over the past two years as well as localised flooding of Quarry 1 due to an isolated weather event in 2022 may further contribute to the decline.

**Table 6-10 Results of Camera Trapping 2025/2026 – Northern Quoll Records**

| Site                   | Individual ID |                    | No. of Triggers |            | No. of Trap Nights |            | Triggers/ Camera trap night |             |
|------------------------|---------------|--------------------|-----------------|------------|--------------------|------------|-----------------------------|-------------|
|                        | (Post-dry)    | (Post-wet)         | (Post-dry)      | (Post-wet) | (Post-dry)         | (Post-wet) | (Post-dry)                  | (Post-wet)  |
| Quarry 1 (Q1)          | -             | -                  | 0               | 0          | 0                  | 0          | 0                           | 0           |
| Quarry 1 Control (Q1C) | -             | -                  | 0               | 0          | 0                  | 0          | 0                           | 0           |
| Quarry 2 (Q2)          | NQ1           | -                  | 2               | 0          | 1                  | 0          | 2                           | 0           |
|                        | -             | NQ3                | 0               | 14         | 0                  | 1          | 0                           | 14          |
|                        | NQ1           | -                  | 1               | 0          | 1                  | 0          | 1                           | 0           |
|                        | -             | NQ4, NQ5, NQ6, NQ7 | 0               | 30         | 0                  | 9          | 0                           | 3.3         |
|                        | -             | NQ6                | 0               | 4          | 0                  | 3          | 0                           | 1.3         |
|                        | -             | NQ4, NQ5, NQ8, NQ9 | 0               | 14         | 0                  | 5          | 0                           | 2.8         |
| Quarry 2 Control (Q2C) | -             | NQ5, NQ8           | 0               | 8          | 0                  | 2          | 0                           | 4           |
|                        | -             | NQ2*               | 0               | 6          | 0                  | 2          | 0                           | 3           |
| Quarry 2 Control (Q2C) | -             | NQ2*               | 0               | 3          | 0                  | 1          | 0                           | 3           |
|                        | -             | NQ2*               | 0               | 3          | 0                  | 1          | 0                           | 3           |
| <b>Total</b>           | <b>9</b>      |                    | <b>3</b>        | <b>79</b>  | <b>2</b>           | <b>23</b>  | <b>1.5</b>                  | <b>3.16</b> |

\* Individual recorded during previous event.

**Table 6-11 Northern Quoll Abundance Over Four Years of Monitoring**

| Site                           | 2011/2012 | 2023      |           |           | 2024      |          |           | 2025     |          |          | 2026     |          |          |
|--------------------------------|-----------|-----------|-----------|-----------|-----------|----------|-----------|----------|----------|----------|----------|----------|----------|
|                                | Total     | Post-dry  | Post-wet  | Total     | Post-dry  | Post-wet | Total     | Post-dry | Post-wet | Total    | Post-dry | Post-wet | Total    |
| <b>Quarry sites</b>            |           |           |           |           |           |          |           |          |          |          |          |          |          |
| Q1                             | 5         | 0         | 0         | 0         | 0         | 0        | 0         | 1        | 0        | 1        | 0        | 0        | 0        |
| Q2                             | 13        | 5         | 10        | 15        | 5         | 8        | 13        | 2        | 4        | 6        | 1        | 7        | 8        |
| <b>Sub-total Quarry sites</b>  | <b>18</b> | <b>5</b>  | <b>10</b> | <b>15</b> | <b>5</b>  | <b>8</b> | <b>13</b> | <b>3</b> | <b>4</b> | <b>7</b> | <b>1</b> | <b>7</b> | <b>8</b> |
| <b>Control sites</b>           |           |           |           |           |           |          |           |          |          |          |          |          |          |
| Q1C                            | 3         | 1         | 1         | 2         | 1         | 1*       | 1         | 0        | 0        | 0        | 0        | 0        | 0        |
| Q2C                            | 6         | 1         | 1         | 2         | 0         | 1        | 1         | 0        | 1        | 1        | 0        | 1        | 1        |
| <b>Sub-total Control sites</b> | <b>9</b>  | <b>2</b>  | <b>2</b>  | <b>4</b>  | <b>1</b>  | <b>1</b> | <b>2</b>  | <b>0</b> | <b>1</b> | <b>1</b> | <b>0</b> | <b>1</b> | <b>1</b> |
| <b>Totals</b>                  | <b>27</b> | <b>19</b> |           |           | <b>15</b> |          |           | <b>8</b> |          |          | <b>9</b> |          |          |

\* Individual recorded during previous event.

#### 6.4.3.2 Feral Predator Monitoring

Monitoring resulted in a total of 12 individual feral predators (eight Feral Cat and four Dingo) recorded across all sites. Post-wet season counts were higher than post-dry season records (Table 6-12).

Five Feral Cats were recorded from the two Quarry sites Q1 and Q2. One Feral Cat was recorded at Q1 over the two monitoring events. Based on the size, shape and stance, the adult Feral Cat at Q2C is likely a resident that was recorded during previous years of monitoring. An additional young cat (not recorded on camera) was observed at Q2C during the post-wet camera installation.

Dingo was recorded at Q2 over two events. A pair of Dingo was recorded during the post-dry season, and a family unit of three individuals was later recorded during the post-wet season (31 May 2026). One Dingo was recorded on a single night (9 May 2026) from Control site Q2C during the post-wet season.

Motion camera triggers were highest at Q2 over two events with a total of 36. This is due to the presence of both Feral Cat and Dingo at the site being recorded over multiple days. Records over two events, with an increase in population during the second, may indicate that these species have a viable population at this site.

Feral predator abundance has remained relatively stable since 2024, with between 9 and 10 individuals being recorded. Feral predator trends at Quarry and Control sites demonstrate an increase in feral predator numbers at Quarry sites. Trends were previously consistent until the 2026 monitoring period. Quarry sites have increase in predator numbers, while numbers at Control sites have decreased (Table 6-13).

**Table 6-12 Results of Camera Trapping 2025/2026 – Predator Records**

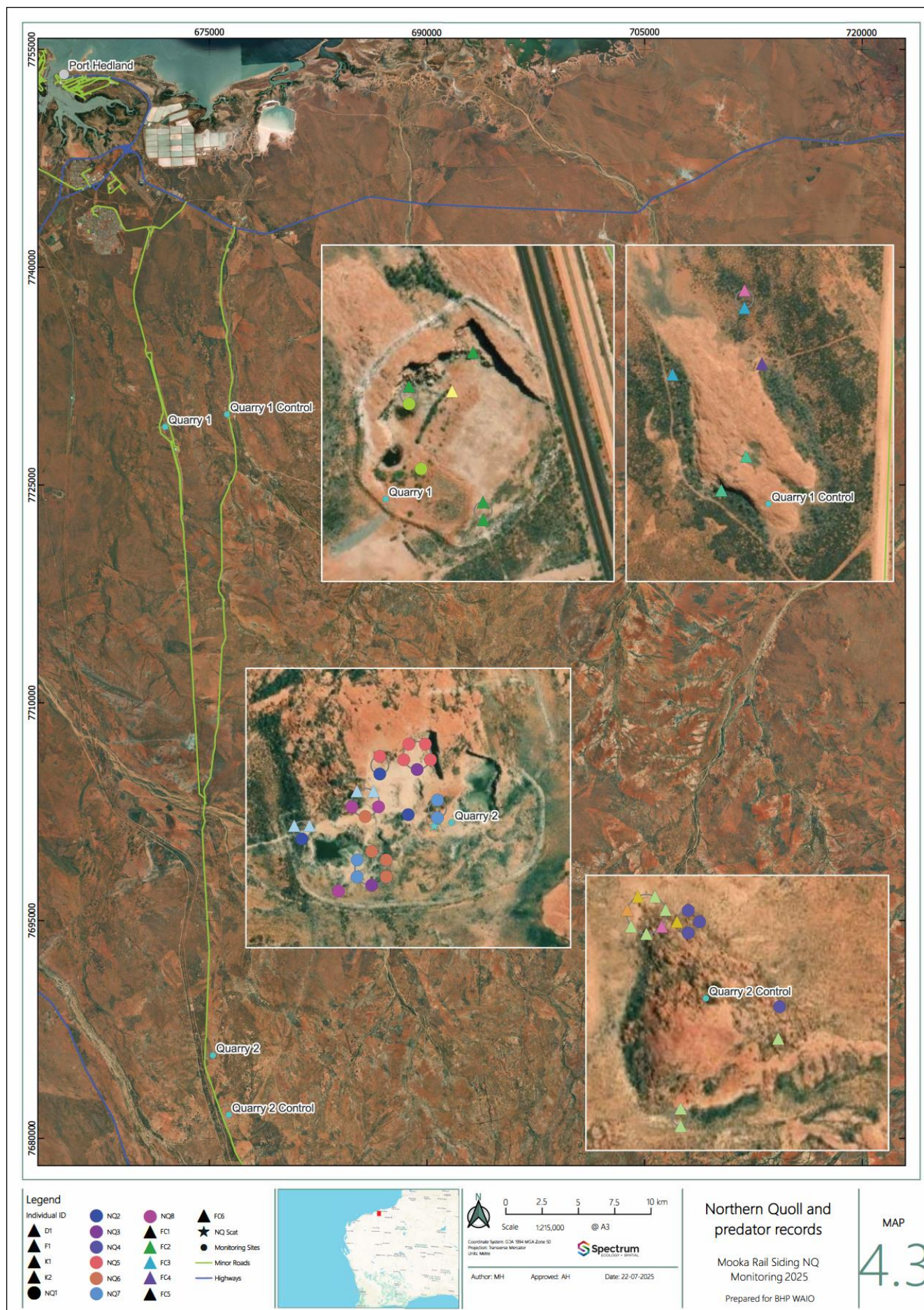
| Site                   | Individual ID |                           | No. of Triggers |          | No. of Trap Nights |          | Triggers/ Camera trap night |          |
|------------------------|---------------|---------------------------|-----------------|----------|--------------------|----------|-----------------------------|----------|
|                        | Post-dry      | Post-wet                  | Post-dry        | Post-wet | Post-dry           | Post-wet | Post-dry                    | Post-wet |
| <b>Quarry sites</b>    |               |                           |                 |          |                    |          |                             |          |
| Quarry 1 (Q1)          | -             | FC3                       | 0               | 4        | 0                  | 2        | 0                           | 2        |
|                        | FC1           | -                         | 1               | 0        | 1                  | 0        | 1                           | 0        |
|                        | -             | FC1                       | 0               | 3        | 0                  | 1        | 0                           | 3        |
|                        | -             | FC3                       | 0               | 2        | 0                  | 2        | 0                           | 1        |
| Quarry 2 (Q2)          | -             | FC4, FC5<br>D1, D2,<br>D3 | 0               | 14       | 0                  | 3        | 0                           | 4.6      |
|                        | -             | FC6                       | 0               | 6        | 0                  | 1        | 0                           | 6        |
|                        | D1, D2        | FC4, FC5<br>D1            | 8               | 7        | 1                  | 2        | 8                           | 3.5      |
|                        | D1            | -                         | 1               | 0        | 1                  | 0        | 1                           | 0        |
| <b>Control sites</b>   |               |                           |                 |          |                    |          |                             |          |
| Quarry 1 Control (Q1C) | -             | FC2                       | 0               | 4        | 0                  | 1        | 0                           | 4        |
|                        | FC2           | -                         | 1               | 0        | 1                  | 0        | 1                           | 0        |
|                        | -             | FC2                       | 0               | 1        | 0                  | 1        | 0                           | 1        |
| Quarry 2 Control (Q2C) | -             | FC6                       | 0               | 1        | 0                  | 1        | 0                           | 1        |
|                        | -             | D4                        | 0               | 3        | 0                  | 1        | 0                           | 3        |
| <b>Total</b>           | 11 (1*)       |                           | 11              | 45       | 4                  | 15       | 2.75                        | 0.3      |

FC = Feral Cat, D = Dingo/Dog. \*Individual recorded during the post-wet camera install (not recorded on motion camera)

**Table 6-13 Feral Predator abundance over four years of monitoring**

| Site                           | 2023*     |          | 2024      |          | 2025     |          | 2026      |          |
|--------------------------------|-----------|----------|-----------|----------|----------|----------|-----------|----------|
|                                | Post-dry  | Post-wet | Post-dry  | Post-wet | Post-dry | Post-wet | Post-dry  | Post-wet |
| <b>Quarry sites</b>            |           |          |           |          |          |          |           |          |
| Q1                             | -         | 1*       | 2         | 0        | 2        | 2        | 1*        | 2        |
| Q2                             | -         | -        | 1         | 1        | 1        | 1        | 2*        | 6        |
| <b>Sub-total Quarry sites</b>  | <b>0</b>  | <b>1</b> | <b>3</b>  | <b>1</b> | <b>3</b> | <b>3</b> | <b>3</b>  | <b>8</b> |
| <b>Control sites</b>           |           |          |           |          |          |          |           |          |
| Q1C                            | 1*        | -        | 2         | 1        | -        | 2        | 1         | 0        |
| Q2C                            | -         | 1*       | 2         | -        | 1        | 4        | 0         | 2        |
| <b>Sub-total Control sites</b> | <b>1</b>  | <b>1</b> | <b>5</b>  | <b>1</b> | <b>1</b> | <b>6</b> | <b>1</b>  | <b>2</b> |
| <b>Totals</b>                  | <b>3*</b> |          | <b>10</b> |          | <b>9</b> |          | <b>10</b> |          |

\* Feral predator abundance was based on Northern Quoll cameras in 2023. Additional feral predator specific cameras were installed in 2024.



Map 6-4 Mooka Northern Quoll and Feral Predator Records

#### 6.4.4 Management Commitments

An update on the management commitments is outlined below.

##### Granite domes utilised by Northern Quoll

No updates during the reporting period.

##### Fire control/management

No updates during the reporting period.

##### Feral animal control

A feral cat trapping programme was executed within the proximity of the Mooka Validation Notice boundary in late 2025. Approximately 15 cats were removed as a result. Feasibility of implementing a feral cat trapping programme within the boundary of the Validation Notice will be investigated for FY2027.

#### 6.4.5 Offsets

In August 2023, BHP provided 100% of the estimated total offset contribution to the PEOF for the loss of 23 ha of supporting habitat for the Northern Quoll.

Given the full financial payment has been made up front, prior to the commencement of works under the Validation Notice, BHP is in discussions with DCCEW and PEOF to remove the requirement for ongoing Impact Reconciliation Reporting.

#### 6.4.6 Land Disturbance Reconciliation

Disturbance undertaken within the Northern Quoll supporting habitat during the reporting period, is provided in Table 6-14.

Ground disturbing activities are assessed in the GLUP system to ensure clearing does not exceed specified limits.

**Table 6-14 Mooka Rail Works Disturbance by habitat type**

| Habitat                   | Activity disturbance July 2025 to June 2026 (ha) | Total disturbance as of 30 June 2026 (ha) | Total Predicted Disturbance (ha) |
|---------------------------|--------------------------------------------------|-------------------------------------------|----------------------------------|
| <b>Northern Quoll</b>     |                                                  |                                           |                                  |
| <b>Supporting Habitat</b> |                                                  |                                           |                                  |
| Sand Plain                | 0.00                                             | 5.82                                      | 23                               |



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## 6.5 Yeerabiddy Rail Siding

The Yeerabiddy Rail Works are located immediately adjacent to the Mining Area C (MAC) Rail Line at Yeerabiddy approximately 13 km north of the MAC mine site, in the Pilbara region of Western Australia. The MAC Rail Line supports the WAIO Supply Chain by connecting the Iron Ore mines at MAC and South Flank Mine to the BHP Rail network.

The Yeerabiddy Rail Works are required to meet the capacity of the MAC and South Flank Mines and will improve efficiency and rail supply chain capacity.

Infrastructure proposed and approved within the Validation Notice 'Activity Area' includes:

- two additional rail sidings approximately 1.5 km and up to 5 km in length,
- level crossings, signals and associated infrastructure,
- access roads to maintain current level of access,
- other ancillary facilities to support the above works.

In August 2023, BHP submitted and published the Yeerabiddy Rail Works Validation Notice for public comment. The Yeerabiddy Validation Notice Rev 1 was finalised on 14 September 2023 and Rev 2 was finalised on 18 September with updates to the disturbance remaining in Table 2.1. The Validation Notice was effective from 12 October 2023.

Works on the Yeerabiddy Rail Works commenced as planned in December 2023 and involved set up of office areas and laydown areas at the southern end of the activity area. Between January 2024 and the end of June 2024, the Notifiable Action had substantively commenced, with most bulk earthworks and civil construction works being completed. Rehabilitation was completed successfully in FY2025 between October 2024 and March 2025, which included rehabilitation of laydown areas and borrow pits. Additionally, the civil, track and signalling scopes carried over into FY2025 with the main commissioning event occurring in September 2024. As all works have been completed there is no further disturbance to report in FY2026.

### 6.5.1 Validation Notice Deviations

No exceedances or deviations from the Yeerabiddy Rail Works Validation Notice were identified during the reporting period.

### 6.5.2 Program Matter Monitoring and Outcomes

The monitoring required to be completed during the reporting period is outlined in Table 6-15. Monitoring results are discussed in the following sections.

**Table 6-15 Program Matter Monitoring Requirements for FY2026 Reporting Period**

| Species   | Monitoring                                                                                                                                                                                                                                                                         | Parameter                      | Due Date            | Performance Targets                                                                   | Performance Target Met                              | Trigger Exceeded | Trends of Concern                                                                                                                                                         | Applicable Program Matter Outcome                                                                                                                                                                           |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|---------------------|---------------------------------------------------------------------------------------|-----------------------------------------------------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ghost Bat | Proposed monitoring is as follows: <ul style="list-style-type: none"> <li>the Category 2 roost (CMIN-03) at least 6 monthly</li> <li>reference sites including but not limited to CMUD-01, CMUD-10 and CACW-31 (pending safe access, heritage and tenure restrictions).</li> </ul> | Ghost Bat presence or evidence | Biannual monitoring | Presence or evidence of presence of Ghost Bat at CMIN-03 over two years of monitoring | No – however see monitoring results discussed below | N/A              | No<br><br>There has been no records of Ghost Bats utilising this cave since its discovery in 2010; no observations have been made since monitoring began in January 2024. | Minimise loss of critical and supporting habitats of the Ghost Bat as a result of the program activities within the SAA<br><br>No loss (or maintain) Ghost Bat colony(s) as a result of program activities. |

### 6.5.3 Population Monitoring

#### 6.5.3.1 Ghost Bat Monitoring

Based on the Ghost Bat monitoring conducted in the FY2026 reporting period, BHP considers the two Program Matter Outcomes have been achieved at the Yeerabiddy Rail Works for the reporting period:

*Minimise loss of critical and supporting habitats of the Ghost Bat as a result of Program Activities within the SAA*

CMIN-03 was mapped and geotechnically assessed in July 2025. There was no evidence of recent collapse however the cave has “a flat roof profile” increasing the risk of roof collapse.

*No loss (or maintain) Ghost Bat colony(s) as a result of program activities.*

There has been no record of Ghost bat activity within CMIN-03 since its discovery in 2010.

Monitoring results are further discussed in the following sections.

#### Sampling

Monitoring at CMIN-03 commenced in January 2024 as part of the MAC and South Flank Ghost Bat Monitoring program. Since monitoring commenced, there has been no scats or evidence of Ghost Bats roosting at CMIN-03.

In FY2026, five field trips were undertaken in July 25, September 25, January 26, March 26 and May 26 as part of the scat collection monitoring program to determine presence/absence of Ghost Bats from scat deposits (refer to Table 6-16). Targeted caves included:

- one cave within 500m of the Validation Notice boundary (CMIN-03)
- three reference caves (CMUD-01, CMUD-10 and CTAN - ACW-31).

Of the monitoring completed in these field trips, there have been no scats or evidence of Ghost Bats roosting in CMIN-03.

The absence of any evidence of Ghost Bat use is consistent with findings for many of the other approximately 34 roosts consistently monitored in the Central Pilbara by BHP. This is also consistent with conservation advice for the species where it is recognised that Ghost Bats move between numerous available roosting caves seasonally or in response to environmental conditions and require a range of roosting sites. Category 2 roosts have been defined in Bullen (2021) with having occupancy as low as 25% of the time. CMIN-03 was categorised by Biologic from a 2010 survey as a high value day roost, based on the presence of scats and cave structure only. The category was then converted to ratings adopted by DCCEEW in 2022 with the application of the precautionary principal. There is no occupancy evidence to demonstrate this roost meets the requirements of a Category 2 roost in accordance with Bullen (2021). No time series data based on observations or ultrasonic recordings has been collected prior to the commencement of monitoring. The present 24-month monitoring program has been unable to establish baseline occupancy for this roost. Records to date show no evidence of Ghost Bat activity in this cave, therefore failing to meet the performance target is not indicative of Ghost Bat loss due to the program's activities.

**Table 6-16 VN Program Matter Monitoring Requirements for FY2025 Reporting Period**

| @Cave                      | Location     | Jul-25               |                     | Sep-25               |                     | Jan-26               |                     | Mar-26               |                     | May-26               |                     |
|----------------------------|--------------|----------------------|---------------------|----------------------|---------------------|----------------------|---------------------|----------------------|---------------------|----------------------|---------------------|
|                            |              | No. of Scats present | No. of Bats Present | No. of Scats present | No. of Bats Present | No. of Scats present | No. of Bats Present | No. of Scats present | No. of Bats Present | No. of Scats present | No. of Bats Present |
| Yeerabiddy Rail Works Site |              |                      |                     |                      |                     |                      |                     |                      |                     |                      |                     |
| CMIN-03                    | Yeerabiddy   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   | 0                    | 0                   |
| Reference Sites            |              |                      |                     |                      |                     |                      |                     |                      |                     |                      |                     |
| CMUD-01                    | Mudlark Well | 0                    | 0                   | 18                   | 0                   | 150                  | 0                   | 1                    | 0                   | 4                    | 0                   |
| CMUD-10                    | Mudlark Well | 1                    | 0                   | 50                   | 0                   | 0                    | 0                   | 5                    | 0                   | 0 <sup>1</sup>       | 0 <sup>1</sup>      |
| CTAN-31 (ACW-31)           | Tandanya     | 0                    | 2                   | 3,500                | 0                   | 5                    | 0                   | 1                    | 0                   | 40                   | 0                   |

<sup>1</sup> Geotech assessed and recommended no entry to cave

#### 6.5.4 Management Commitments

An update on the management commitments is outlined below:

##### Implement Feral Cat Management

Opportunistic sightings of Feral cats are reported to the Site Environmental Specialist and/or documented in the BHP Event Management System. There have been no Feral cat sightings within the Yeerabiddy Activity Area or within the vicinity of CMIN-03 during the FY2026 reporting period. Camera traps targeting cats, were placed at roosts more regularly occupied by the local population of Ghost Bats during the FY2025 period. Visitation rates were commonly low for these roosts suggesting that Feral cats are not targeting roosts but rather moving through the area with an opportunistic feeding strategy. This monitoring program was not continued into FY2026 on this basis. Four Felixer units have been deployed in Mining Area C with the aim of controlling feral cat populations and are managed according to the WAIO Animal and Pest Management Plan. Currently, they are active in photo-mode only for 4 weeks after which they will transition to lethal-mode.

##### Implement Light Spill Management

No night shifts occurred during the reporting period.

##### Implement Fire Management

Hot work management procedures are in place through the BHP permitting system to ensure that any hot works across site comply with BHP procedures and standards.

There were no hot works required for this project under BHP's Hot Work Permit process in FY2026.

Wildfires are managed in collaboration with the Department of Fire and Emergency Services and local authorities. No uncontrolled bush fires occurred within the VN area in the reporting year.

##### Restrict human access to high value Ghost Bat caves

High value bat caves have been identified within the company's spatial systems which are utilised for the internal GLUP permits. Buffers application to high value bat caves are recorded in these systems and have been excluded from all permits, in accordance with the avoidance commitments made in the Validation Notice. Other than for monitoring no human access occurred other than for monitoring during the reporting period as these restrictions are defined in the company's internal land use permitting system and therefore no works have been permitted within the areas.

The first round of biannual Ghost Bat monitoring occurred in January 2024 at cave CMIN-03. The cave is outside of the Yeerabiddy Project Activity Area and as such, the works remained at least 140 m from the cave as per the approved BHP GLUP boundary.

#### 6.5.5 Offsets

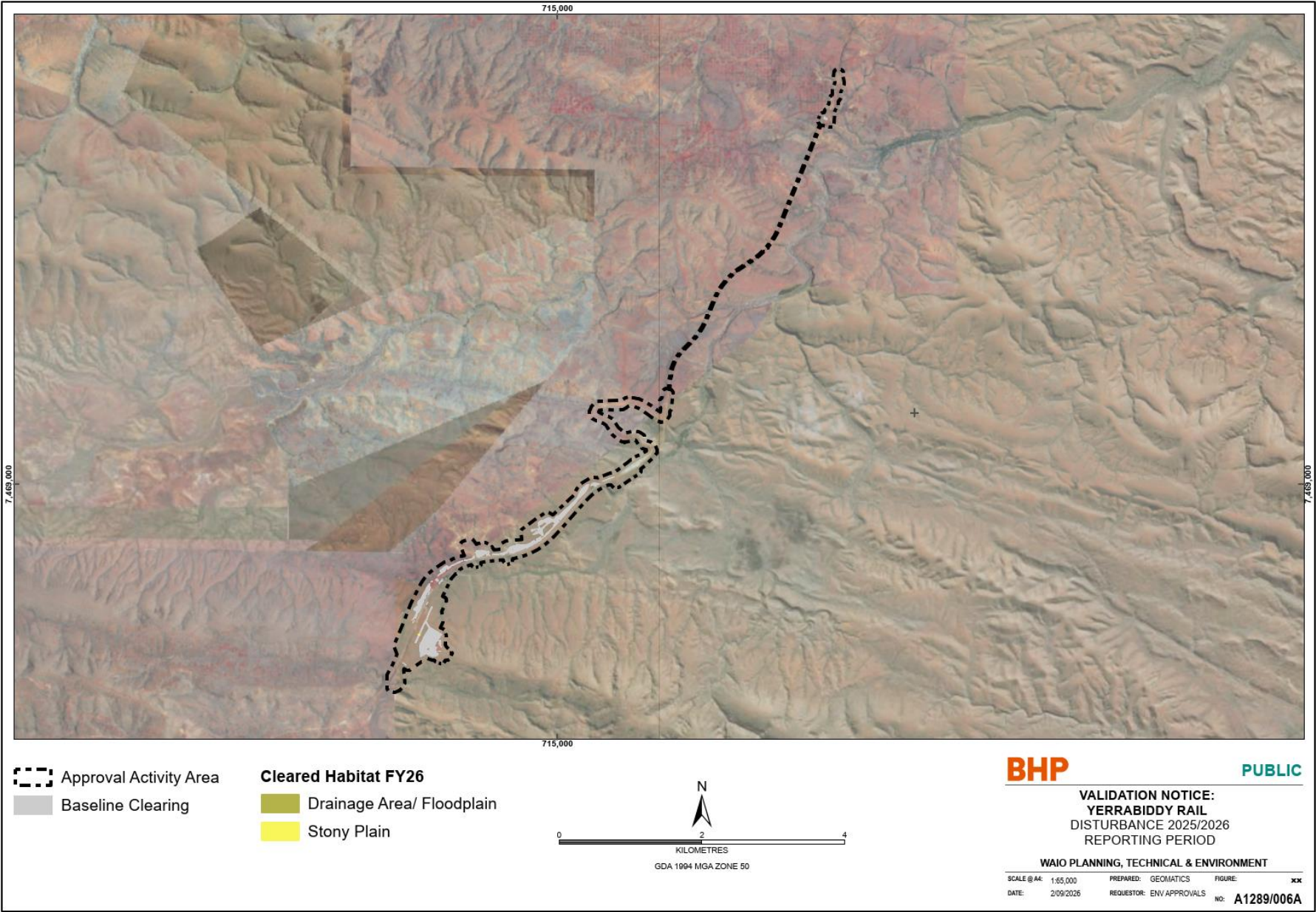
BHP provided financial contributions to the PEOF for the full offset commitment at the commencement of the Validation Notice in October 2023. Offsets applied to the loss of 60.02 ha of critical roosting and foraging habitat for the Ghost Bat, to achieve this Program Matter Objective.

#### 6.5.6 Land Disturbance Reconciliation

The clearing commitments which form part of this Validation Notice are presented in 6-19, including disturbance undertaken by habitat type during the reporting period. During FY2026, all ground disturbance was approved through BHP's internal GLUP process.

**Table 6-17 Yeerabiddy Rail Works Disturbance by habitat type**

| Habitat                          | Activity disturbance between October 2026 to June 2026 (ha) | Total disturbance as of 30 June 2026 (ha) | Total Predicted Disturbance (ha) |
|----------------------------------|-------------------------------------------------------------|-------------------------------------------|----------------------------------|
| <b>Ghost Bat</b>                 |                                                             |                                           |                                  |
| <b>Critical roosting habitat</b> |                                                             |                                           |                                  |
| Breakaway/Cliff                  | 0.00                                                        | 0.00                                      | 0.34                             |
| <b>Critical foraging habitat</b> |                                                             |                                           |                                  |
| Hill Crest/Hill Slope            | 0.00                                                        | 2.03                                      | 8.46                             |
| Minor Drainage Line              | 0.00                                                        | 0.15                                      | 3.01                             |
| Drainage Area/Flood Plain        | 0.00                                                        | 9.81                                      | 21.69                            |
| Stony Plain                      | 0.00                                                        | 8.86                                      | 26.52                            |
| <b>Total</b>                     | <b>0.00</b>                                                 | <b>20.85</b>                              | <b>60.02</b>                     |



Map 6-6    Yeerabiddy Rail Siding Validation Notice Habitat Disturbance FY2026

## **6.6 Western Ridge**

Western Ridge is located approximately 2 km southwest of the town of Newman, in the Pilbara region of Western Australia. It is located adjacent to the Mt Whaleback mine and the Orebody 29/30/35 mine.

Western Ridge was declared a Derived Proposal subject to Ministerial Statement 1105 in September 2023. The Western Ridge Validation Notice took effect on 19 October 2023.

The Western Ridge project includes clearing of up to 4,281 ha within an Activity Area of 7,234 ha for above and below water table mining of four iron ore deposits, overburden storage areas, primary crusher, overland conveyor, haul and access roads, stockpiles, dewatering, creek diversions, discharge of surplus water and associated mine infrastructure and activities.

The Western Ridge project is in execution phase, with construction activities commencing in July 2024.

### **6.6.1 Validation Notice Deviations**

No deviations were reported in the reporting period.

### **6.6.2 Program Matter Monitoring and Outcomes**

The monitoring required to be completed during the reporting period is outlined in Table 6-18. Monitoring results are discussed in the following sections.

**Table 6-18 Monitoring undertaken in the reporting period**

| Species              | Monitoring                                                                                                                                                                                                                                                                                                                                                                                 | Parameter                                    | Due Date                                                                                                                              | Performance Targets                                                                                                                                                     | Performance Target Met | Trigger Exceeded | Trends of Concern                                                                                                            | Applicable Program Matter Outcome                                                                                                                                                                                                           |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|------------------|------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ghost Bat            | Quarterly monitoring at retained caves CWER-01, CWER-03, CWER-10, CWER-16 and CWER-17, using techniques such as scat collection and analysis and motion camera footage, environmental noise and vibration monitoring.. Annual monitoring at CWER-04, CWER-07, CWER-09 and CWER-14 providing safe access is confirmed.                                                                      | Presence or evidence of Ghost Bat presence   | Quarterly monitoring at CWER-01, CWER-03, CWER-10, CWER-16 and CWER-17<br><br>Annual monitoring at CWER-04, CWER-07, CWER-09, CWER-14 | Presence or evidence of presence of Ghost Bat at one or more Ghost Bat caves over one year of monitoring                                                                | Yes                    | No               | No<br><br>Given small baseline population, monitoring of the retained caves raises no concerns with local population trends. | Minimise loss of critical and supporting habitats of the Ghost Bat as a result of Program Activities within the SAA<br><br>AND<br><br>No loss (or maintain) Ghost Bat colony(s) as a result of program activities                           |
| Pilbara Olive Python | Annual monitoring in the wet season of retained Gorge/Gully habitat within the Activity Area and/or temporary surface water features located within the Activity Area and Nankunya (outside of Activity Area). Exact sites are to be confirmed. Methods may include but are not limited to targeted searches, genetic analyses of scats/sloughs/tissue and eDNA markers in water features. | Presence or evidence of Pilbara Olive Python | Annual monitoring in wet season                                                                                                       | Presence or evidence of presence of Pilbara Olive Python over one year of monitoring within the Activity Area and in critical habitat within 500 m of the Activity Area | Yes                    | No               | No                                                                                                                           | Minimise loss of critical and supporting habitats of the Pilbara Olive Python as a result of Program Activities within the SAA<br><br>AND<br><br>No loss (or maintain) Pilbara Olive Python population(s) as a result of Program activities |

### 6.6.3 Population Monitoring

Monitoring of Ghost Bat to date (described in Section 6.6.3.1) demonstrates that the following Program Matter Outcomes for Ghost Bat have been achieved for the reporting period:

*Minimise loss of critical and supporting habitats of the Ghost Bat as a result of Program Activities within the SAA.*

*No loss (or maintain) Ghost Bat colony(s) as a result of program activities*

Monitoring of Pilbara Olive Python (described in Section 6.6.3.2) similarly demonstrates that the following Program Matter Outcomes for Pilbara Olive Python have been achieved for the reporting period:

*Minimise loss of critical and supporting habitats of the Pilbara Olive Python as a result of Program Activities within the SAA.*

*No loss (or maintain) of Pilbara Olive Python population(s) as a result of Program activities.*

Monitoring results for Ghost Bat and Pilbara Olive Python are discussed in the following sections.

#### 6.6.3.1 Ghost Bat Monitoring

Quarterly Ghost Bat monitoring has been carried out throughout the reporting period, as identified in Table 6-19 below.

**Table 6-19 Ghost Bat quarterly monitoring events in the reporting period**

| Cave    | Quarterly Monitoring and Results                                                                                                               |                                                                                                                                                     |                                                                                                                                     |                                                                                                                                               |
|---------|------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
|         | 15 Jul 2025                                                                                                                                    | 29 Sep 2025                                                                                                                                         | 24 Feb 2026                                                                                                                         | 11 Jun 2026                                                                                                                                   |
| CWER-01 | Monitoring equipment serviced and data downloaded. One ghost bat scat collected.                                                               | Monitoring equipment serviced and data downloaded.                                                                                                  | Cave not accessed due to operational constraints.                                                                                   | Geotechnical assessment completed. No ghost bat scat recorded. Ultrasonic data downloaded. Video camera malfunction identified and rectified. |
| CWER-03 | Monitoring equipment serviced and data downloaded. Escort required.                                                                            | Monitoring equipment serviced and data downloaded. Escort and heritage representative required.                                                     | Geotechnical assessment completed. Monitoring equipment serviced. Ultrasonic battery replaced. Three scat sheets remained deployed. | Geotechnical assessment completed. Forty-six ghost bat scats recorded, with 16 collected for analysis. Ultrasonic and video data downloaded.  |
| CWER-10 | Monitoring equipment serviced and data downloaded.                                                                                             | Monitoring equipment serviced and data downloaded.                                                                                                  | Geotechnical assessment completed. Monitoring equipment serviced. Two scat sheets remained deployed.                                | Geotechnical assessment completed. Minor recent rockfall observed. No ghost bat scat recorded. Ultrasonic data downloaded.                    |
| CWER-16 | Monitoring equipment serviced and data downloaded.                                                                                             | Monitoring equipment serviced and data downloaded.                                                                                                  | Geotechnical assessment completed. Monitoring equipment serviced.                                                                   | Monitoring equipment serviced and data downloaded.                                                                                            |
| CWER-17 | Monitoring equipment serviced and data downloaded. Camera communication issues prevented SD card formatting, resulting in potential data loss. | Monitoring equipment serviced and data downloaded. Nine ghost bat scats collected. Potential ultrasonic data loss identified due to SD card issues. | Cave not accessed due to operational constraints.                                                                                   | Geotechnical assessment completed. No ghost bat scat recorded. Ultrasonic data downloaded. Video camera malfunction identified and rectified. |

**Table 6-20 Ghost Bat annual monitoring events in the reporting period**

| Cave    | Annual Monitoring and Results                                                   |                                                                                                                        |
|---------|---------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
|         | 15 July 2025 and 29 September 2025                                              | 29 March 2026                                                                                                          |
| CWER-04 | Monitoring completed. No ghost bat scats recorded. Photo monitoring undertaken. | Geotechnical assessment completed. No Ghost Bat scats recorded. Photo monitoring identified no additional disturbance. |
| CWER-07 | Monitoring completed. No ghost bat scats recorded. Photo monitoring undertaken. | Not monitored during this survey period.                                                                               |
| CWER-09 | Monitoring completed. No ghost bat scats recorded. Photo monitoring undertaken. | Geotechnical assessment completed. No ghost bat scats recorded. Photo monitoring identified no additional disturbance. |
| CWER-14 | Monitoring completed. No ghost bat scats recorded. Photo monitoring undertaken. | Geotechnical assessment completed. No ghost bat scats recorded. Photo monitoring identified no additional disturbance. |

Note, small amount of recent rockfall at CWER10 was documented during the June 2026 inspection, but the cave remains safe to enter.

CWER-01 had missing ultrasonic data between December 2025 and March 2026. The cause of the ultrasonic monitoring data loss could not be determined despite inspections of field equipment and attempts to recover data. Investigations are ongoing, with mitigation measures including deployment of higher temperature-rated industrial SD cards and evaluation of enhanced data recovery methods to reduce the likelihood and impact of future data loss. This issue was rectified and data was successfully recorded from March to June 2026, which was the last attendance of the caves for the 2025-2026 reporting period.

CWER-17 had temporary video camera failures between March and June 2026, due to incorrectly formatted SD cards, which was identified and subsequently rectified.

Reporting of Ghost Bat monitoring data is collated into an annual report. Preparation of the annual report commences after the final monitoring event of the calendar year. The report for the 2025-2026 monitoring was in preparation at the time of AER reporting.

#### 6.6.3.2 Pilbara Olive Python

Monitoring activities for Pilbara Olive Python were carried out in November 2025 and March 2026. The summary is as follows:

- During the 2026 reporting period at Western Ridge, two new individuals were recorded: one adult male (2,550 g, 1,855 mm snout-vent length), found south of Nankunya, in Xanadu Gorge, and one neonate female (115 g, 885 mm snout-vent length), found northwest of Nankunya in a drainage line. Genetic samples were collected from both individuals, bringing the Survey Area total to 12.
- The neonate individual was the first to be recorded at Western Ridge since monitoring commenced in 2022 and provides direct evidence of successful breeding within, or in the immediate vicinity of, the Survey Area during the 2025–2026 breeding season.
- Two of the eight previously tagged individuals were located during the reporting period: POP 219 and POP 220. POP 219 was tracked in November 2025 to a rehabilitated drill area, where it is inferred to have been buried during rehabilitation works; excavation was attempted but the individual could not be recovered and it is considered deceased. POP 220 was opportunistically captured in November 2025 with a transmitter that was no longer functioning; this individual was re-tagged and tracked throughout the reporting period, with seven relocations gained during the two field trips.
- Twenty eDNA samples were collected from four sampling events across three water bodies at Nankunya. All were analysed using the Helix species-specific qPCR probe for the presence of POP. None of the 20 filters amplified sufficiently to be considered positive, and no evidence of POP eDNA was detected at any of the sampled water bodies.
- Since the commencement of radio-tracking at Western Ridge in January 2022, Pilbara Olive Pythons have been observed using four different fauna habitats:
  - Gorge/Gully being the most frequently used across all individuals (72.5 % of location events),
  - Hillcrest/Hillslope (17.5% of location events),
  - Minor Drainage Lines (6.2 % of location events), and
  - Breakaway/Cliff (3.8 % of location events).

No secondary sign was detected during targeted searches.

#### **6.6.4 Management Commitments**

An update on the management commitments is outlined below.

##### **Implement feral cat management**

Feral cat management processes have been adopted to undertake opportunistic trapping. Cameras have been installed at each cave to detect cats and a contractor will be engaged to undertake a control program as required. All interactions with feral animals are reported to allow for management practices to be specific to the areas of interactions.

##### **Implement fire management**

BHP has implemented procedures to ensure high risk tasks, such as hot works, are not carried out at high risk times and that all fire notifications from the relevant authorities are implemented. Emergency services are available to support in the event of any fire incident.

##### **Restrict barbed wire usage**

Barbed wire has been limited onsite to areas where required by legislation. Conditions are also applied through the GLUP system to ensure that barbed wire is avoided, and where it is required to be used, only single strand barbed wire is used, with bat deflectors installed to deter Ghost Bats.

No installation of barbed wire has occurred during the reporting period. Infrastructure that has been procured for the management of dust emissions has been designed and constructed to ensure no barbed wire is utilised on the fencing around the monitoring unit.

There is no active infrastructure established within Western Ridge that has a legal requirement to have barbed wire installed.

##### **Restrict human access to high value Ghost Bat caves**

High value bat caves have been identified within the company's spatial systems which are utilised for the internal GLUP permits. Buffers application to high value bat caves are recorded in these systems and have been excluded from all permits, in accordance with the avoidance commitments made in the Validation Notice. No human access occurred during the reporting period as these restrictions are defined in the company's internal land use permitting system and therefore no works have been permitted within the areas.

#### **6.6.5 Offsets**

An advanced 10 per cent payment of the estimated total offset amount for the Western Ridge Validation Notice was contributed to the PEOF in December 2023.

The first biennial payment was lodged in compliance with the prescribed reporting period. A Request for Information was subsequently received requiring a review of the submitted spatial data. In response, the spatial data was reviewed and resubmitted, with the resubmission finalised on 5 June 2026.

Implementation and achievements of offset programs undertaken by PEOF are available on the [PEOF website](#).

#### **6.6.6 Land Disturbance Reconciliation**

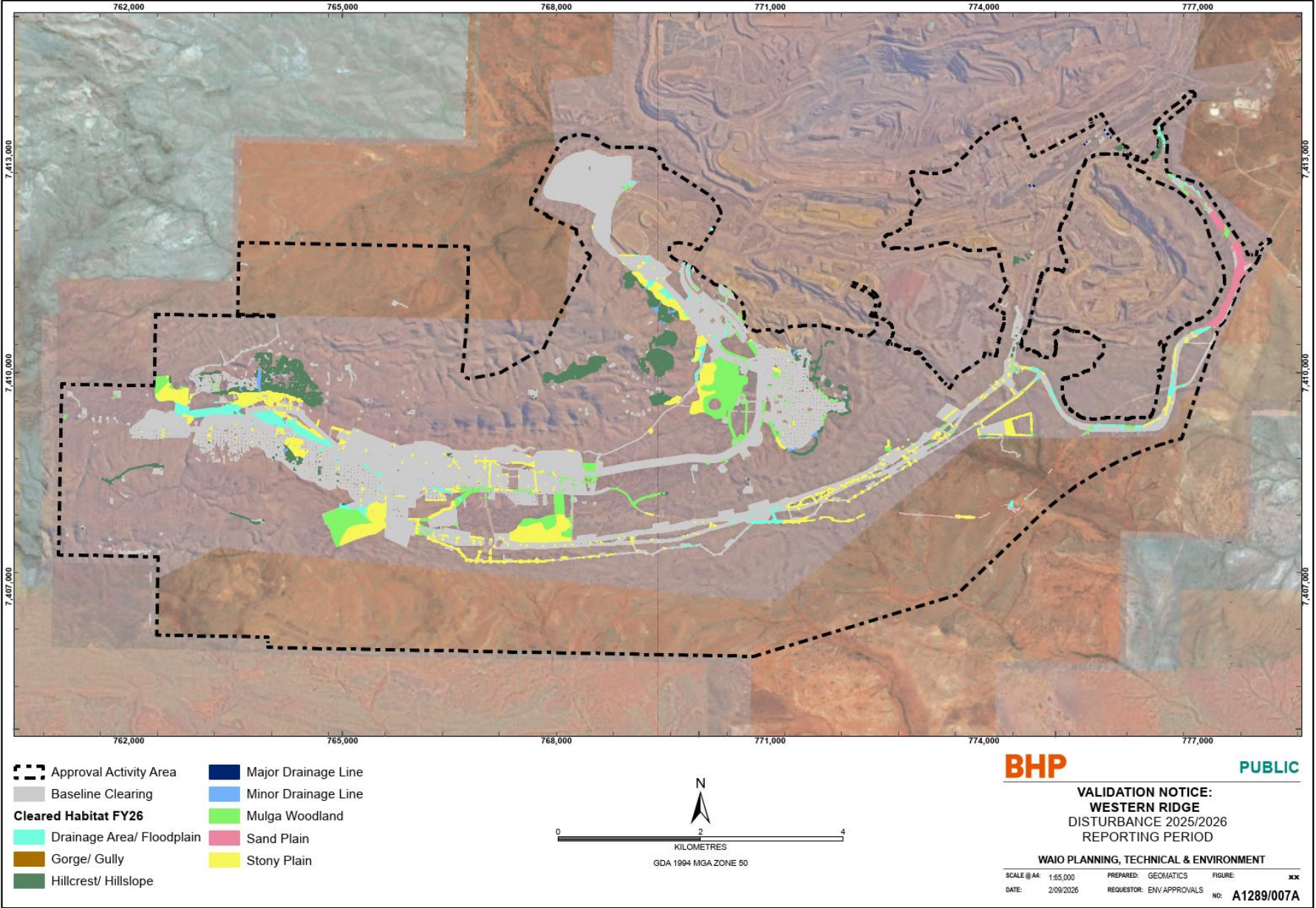
Disturbance undertaken within the Northern Quoll (critical denning and foraging habitat and supporting habitat), Ghost Bat critical roosting, critical foraging habitat and supporting habitat, Pilbara Olive Python critical and supporting habitat, Pilbara Leaf-nosed Bat supporting foraging habitat during the reporting period, is provided in Table 6-21.

Land disturbance is managed through an internal land use permit process which allows for management of clearing within approved limits and avoidance of habitats, where applicable.

**Table 6-21 Western Ridge Disturbance by habitat type**

| Habitat                                      | Activity disturbance July 2025 to June 2026 (ha) | Total disturbance as of 30 June 2026 (ha) | Total Predicted Disturbance (ha) |
|----------------------------------------------|--------------------------------------------------|-------------------------------------------|----------------------------------|
| <b>Northern Quoll</b>                        |                                                  |                                           |                                  |
| <b>Critical denning and foraging habitat</b> |                                                  |                                           |                                  |
| Gorge/Gully                                  | 0.10                                             | 0.57                                      | 108.00                           |
| Breakaway/Cliff                              | 0.00                                             | 0.07                                      | 39.00                            |
| <b>Total</b>                                 | <b>0.10</b>                                      | <b>0.63</b>                               | <b>147.00</b>                    |
| <b>Supporting foraging habitat</b>           |                                                  |                                           |                                  |
| Hillcrest/Hillslope                          | 52.24                                            | 135.58                                    | 1,162.70                         |
| Stony Plain                                  | 73.62                                            | 447.58                                    | 1,469.30                         |
| <b>Total</b>                                 | <b>125.86</b>                                    | <b>583.16</b>                             | <b>2,632.00</b>                  |
| <b>Ghost Bat</b>                             |                                                  |                                           |                                  |
| <b>Critical roosting habitat</b>             |                                                  |                                           |                                  |
| Gorge/Gully                                  | 0.10                                             | 0.57                                      | 108.00                           |
| Breakaway/Cliff                              | 0.00                                             | 0.07                                      | 39.00                            |
| <b>Total</b>                                 | <b>0.10</b>                                      | <b>0.63</b>                               | <b>147.00</b>                    |
| <b>Critical foraging habitat</b>             |                                                  |                                           |                                  |
| Drainage Area/Floodplain                     | 28.71                                            | 208.88                                    | 379.40                           |
| Mulga Woodland                               | 69.40                                            | 274.99                                    | 647.80                           |
| Stony Plain                                  | 73.62                                            | 447.58                                    | 1,469.30                         |
| Minor Drainage Line                          | 0.98                                             | 2.45                                      | 56.00                            |
| <b>Total</b>                                 | <b>172.71</b>                                    | <b>933.90</b>                             | <b>2,552.50</b>                  |
| <b>Supporting habitat</b>                    |                                                  |                                           |                                  |
| Category 4 roosts                            | Nil                                              | Nil*                                      | Five                             |
| <b>Pilbara Olive Python</b>                  |                                                  |                                           |                                  |
| <b>Critical habitat</b>                      |                                                  |                                           |                                  |
| Gorge/Gully                                  | 0.10                                             | 0.57                                      | 108.00                           |
| Breakaway/Cliff                              | 0.00                                             | 0.07                                      | 39.00                            |
| <b>Total</b>                                 | <b>0.10</b>                                      | <b>0.63</b>                               | <b>147.00</b>                    |
| <b>Supporting habitat</b>                    |                                                  |                                           |                                  |
| Minor Drainage Line                          | 0.98                                             | 2.45                                      | 56.00                            |
| <b>Pilbara Leaf-nosed Bat</b>                |                                                  |                                           |                                  |
| <b>Supporting foraging habitat</b>           |                                                  |                                           |                                  |
| Gorge/Gully                                  | 0.10                                             | 0.57                                      | 108.00                           |
| Breakaway/Cliff                              | 0.00                                             | 0.07                                      | 39.00                            |
| Hillcrest/Hillslope                          | 52.24                                            | 135.58                                    | 1,162.70                         |
| Minor Drainage Line                          | 0.98                                             | 2.45                                      | 56.00                            |
| Drainage Area/Floodplain                     | 28.71                                            | 208.88                                    | 379.40                           |
| <b>Total</b>                                 | <b>82.03</b>                                     | <b>347.54</b>                             | <b>1,745.10</b>                  |

\* Note: last years reporting of cave SF11 being disturbed was an administrative error.



Map 6-7 Western Ridge Validation Notice - Habitat Disturbance FY2026

## 6.7 Jimblebar Significant Amendment

The Jimblebar mining operations are located approximately 40 km east of the town of Newman and include above and below water table mining of open iron ore pits, overburden storage areas and the operation of associated mine, processing and rail infrastructure. Groundwater is abstracted for water supply and to dewater the orebodies. Surplus water management includes transfer to Ophthalmia Dam, controlled creek discharge to Jimblebar Creek and Caramulla Creek and MAR at Orebody 18 and Caramulla.

The Jimblebar Significant Amendment Validation Notice was first published for public comment in February 2024 and came into effect on 17 September 2024. This section reports on the Jimblebar Significant Amendment Validation Notice (September 2024) from 1 July 2025 to 30 June 2026.

BHP prepared the Validation Notice to identify additional disturbance required for new activities and infrastructure. New infrastructure and activities included in the Validation Notice include additional overburden storage areas, pit expansions including below water table mining, pipeline corridors, haul roads, creek diversion, processing infrastructure, overland conveyor, beneficiation plant, in-pit tailings storage, topsoil stockpiles, borrow and laydown, communications infrastructure and rehabilitation and closure.

The Jimblebar Significant Amendment Validation Notice (September 2024) did not reassess or change the activity described in original Jimblebar Optimisation Project Validation Notice (2020) or the revised Jimblebar Optimisation Project Validation Notice (September 2023). The Jimblebar Significant Amendment Validation Notice Activity Area overlaps with the Revised Validation Notice Activity Area, however, the activities assessed under the Significant Amendment are in addition to (and not covered by) the Revised Validation Notice.

BHP has also referred Jimblebar Significant Amendment Proposal under Part IV of the *Environmental Protection Act 1986* (EP Act), with approval granted on 8 December 2025.

### 6.7.1 Validation Notice Deviations

No deviations were reported in the reporting period.

### 6.7.2 Program Matter Monitoring and Outcomes

The monitoring required to be completed during the reporting period is outlined in Table 6-22. Monitoring results are discussed in the following sections.

**Table 6-22 Monitoring undertaken in the reporting period**

| Species   | Monitoring                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Parameter              | Due Date                              | Performance Targets                                                                                         | Performance Target Met | Trigger Exceeded | Trends of Concern | Applicable Program Matter Outcome                                            |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|---------------------------------------|-------------------------------------------------------------------------------------------------------------|------------------------|------------------|-------------------|------------------------------------------------------------------------------|
| Ghost Bat | <p>Monitoring Ghost Bat presence and usage of the Activity Area.</p> <p>Proposed monitoring is as follows:</p> <ul style="list-style-type: none"> <li>Category 2 roosts (CJIM-03 and CNIN-03) at least 6 monthly</li> <li>Category 3 roosts (CNIN-01, CNIN-13, CJIM-09) at least yearly</li> <li>Category 4 roosts (CJIM-01, CJIM-05, CJIM-06, CJIM-08, CJIM15, CJIM17, CJIM-20*, at least two yearly</li> </ul> <p>(all pending safe access, heritage and tenure restrictions).</p> | Presence of Ghost Bat. | Six monthly to two yearly monitoring. | Presence or evidence of presence of Ghost Bat at one or more Ghost Bat roosts over two years of monitoring. | Yes                    | N/A              | No                | No loss (or maintain) Ghost Bat colony(s) as a result of Program activities. |

\* As of February 2025, roost CJIM-20 is unable to be monitored due to access constraints to this cave due to heritage restrictions. This cave was last visited in April 2024 and was removed from monitoring program in the April 2025 update of the Terrestrial Fauna EMP.

### 6.7.3 Population Monitoring

Monitoring of Ghost Bat to date (described below) demonstrates that the following Program Matter Outcomes for Ghost Bat have been achieved for the FY2025 reporting period:

*Minimise loss of critical and supporting habitats of the Ghost Bat as a result of Program Activities within the SAA*

AND

*No loss (or maintain) Ghost Bat colony(s) as a result of program activities*

Monitoring results for Ghost Bat is discussed in the following sections.

#### 6.7.3.1 Ghost Bat Monitoring

##### Sampling

In FY2026, four field trips were undertaken to determine presence/absence of Ghost Bats in caves within or adjacent to the activity in line with the monitoring conditions of the Significant Amendment Validation Notice. Cave visiting frequencies outlined within the Validation Notice (Table 6-23) were achieved within the reporting period. Cave entry was permitted, based on geotechnical assessment prior to entry. Cave collapse risk will continue to be assessed, and entry may be restricted in the future if it is determined it is unsafe to enter.

##### July 2025

During field trip one (14 to 19 July 2026):

- Ten out of the twelve caves were visited.
- Ghost bat scat was collected at CNIN-01; and
- No Ghost Bat individuals were observed during the field trip.

##### September 2025

During field trip two (25 to 29 September 2025):

- Six out of the twelve caves were visited.
- Ghost bat scat was collected at CNIN-01; and
- No Ghost Bat individuals were observed during the field trip.

##### January 2026

During field trip three (20 to 22 January 2026), one of the twelve caves were visited and no scats were collected, or Ghost Bats observed during the field trip.

##### February 2026

During field trip four (23 to 27 February), six of the twelve caves were visited and no scats were collected, or Ghost Bats observed during the field trip.

**Table 6-23 Jimblebar caves monitored during the reporting period**

| Cave ID              | Roost Type  | Visitation Frequency | July 2025 | Sept 2025 | Jan 2026 | Feb 2026 |
|----------------------|-------------|----------------------|-----------|-----------|----------|----------|
| CJIM-01              | Category 4  | Two yearly           |           | ✓         |          |          |
| CJIM-03              | Category 3* | Yearly*              | ✓         | ✓         |          | ✓        |
| CJIM-05              | Category 2* | Six monthly*         | ✓         | ✓         |          | ✓        |
| CJIM-06              | Category 4  | Two yearly           | ✓         |           |          |          |
| CJIM-08              | Category 4  | Two yearly           | ✓         |           |          |          |
| CJIM-09              | Category 3  | Yearly               | ✓         | ✓         |          | ✓        |
| CJIM-15              | Category 4  | Two yearly           | ✓         |           |          |          |
| CJIM-17              | Category 4  | Two yearly           | ✓         |           |          |          |
| CJIM-20 <sup>^</sup> | Category 4  | Not monitored        | -         | -         | -        | -        |
| CNIN-01              | Category 2* | Yearly               | ✓         | ✓         |          | ✓        |
| CNIN-03              | Category 2  | Six monthly          | ✓         | ✓         |          | ✓        |
| CNIN-13              | Category 3  | Yearly               | ✓         |           | ✓        | ✓        |

\* Biologic recommended changes to the following cave categories based on further data:

CJIM-03 changed to Category 3 from Category 2 (Biologic 2026)

CJIM-05 changed from Category 4 to Category 3 (Biologic 2026)

CNIN-01 was upgraded to Category 2 from Category 3 (Biologic in prep)

<sup>^</sup> CJIM-20 was not visited and is no longer included within the monitoring program on request of the Traditional Owners.

### Ultrasonic recordings

Bat call detection via ultrasonic monitoring was conducted across several caves during the FY2026 reporting period. Analysis of the acoustic data confirmed the following Ghost Bat call detections at:

- CJIM-05 in July 2025
- CNIN-03 in July, August and September 2025.

Additional ultrasonic data has been collected and is currently undergoing analysis concurrent with the preparation of this report.

### 6.7.4 Management Commitments

An update on the management commitments is outlined below.

#### Restrict barbed wire usage:

Barbed wire has been limited onsite to areas where required by legislation. Conditions are also applied through the GLUP system to ensure that barbed wire is avoided, and where it is required to be used, only single strand barbed wire is used, with bat deflectors installed to deter Ghost Bats.

#### Restrict access to Ghost Bat caves during breeding season:

High value bat caves have been identified as exclusion zones within BHP spatial systems. High value bat caves are excluded from all land use permits, in accordance with the avoidance commitments made in the Validation Notice. Monitoring of Ghost Bat caves was completed outside of the Ghost Bat breeding season (October\* to January).

\*Please note the commencement of the Ghost Bat breeding season has been revised to October in the Significant Amendment Validation Notice

#### Feral cat control:

Opportunistic sightings of feral cats are reported to the Site Environmental Specialist and/or documented in the BHP Event Management System. No feral cat sightings were formally reported during FY2026. A QR code reporting form will be rolled out across site in FY2027 to improve reporting of feral cat sightings.

A feral cat monitoring program was commenced across Jimblebar in FY2026, which included monitoring of feral cat presence near high value Ghost Bat roosts. Motion activated cameras were deployed during FY2026 at the entrances of the following caves: CJIM-03, CNIN-03, CNIN-09 and CNIN-12. Results of the FY2026 monitoring program are being prepared and will be further discussed in the next reporting period. Insights will inform strategic management approaches to reduce the threat of feral cats in current and future developments.

BHP has secured two *Felixer* grooming traps for targeted feral cat control during FY2027, with the units planned to be deployed at the entrance to ghost bat caves. BHP plans to implement a wider targeted feral cat control across its tenure in FY2027.

#### Implement fire management

Hot work management procedures are in place through the BHP permitting system to ensure that any hot works across site comply with the BHP procedures and standards.

Across Jimblebar, fire breaks are implemented around powerline corridors, water pipelines, conveyors, and infrastructure to ensure that fire risks are managed appropriately and to reduce the risk of fire to the Ghost Bat population. Fire break management is maintained through work orders which are scheduled between six to twelve months annually.

Designated smoking areas are available at crib huts and administrative buildings to ensure smoking is contained to specified areas and to reduce the risk of fire threats across site.

### 6.7.5 Offsets

BHP provided an initial ten per cent advance payment of the estimated financial offset contribution to the PEOF on 8 October 2024 and 20 March 2025. Offsets applied to the loss of 871.6 ha of critical habitat, supporting habitat and critical foraging habitat for the Ghost Bat, and 1,206.5 ha of supporting habitat for the Northern Quoll, to achieve the Program Matter Objective.

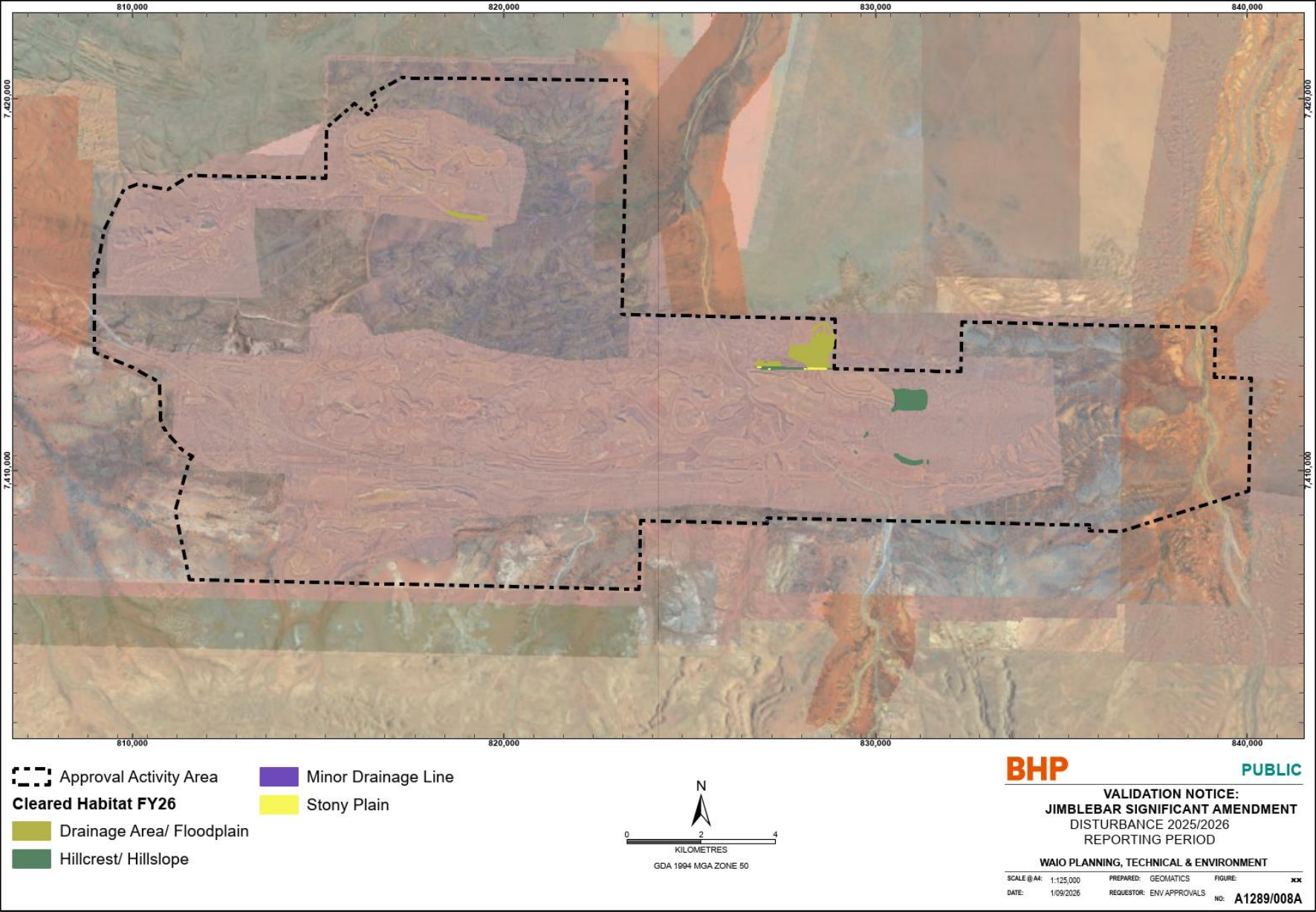
Implementation and achievements of offset programs undertaken by PEOF are shown on the [PEOF website](#). The implementation of current and future offset programs funded by BHPs contributions are discussed further in Section 1-5 above.

### 6.7.6 Land Disturbance Reconciliation

Disturbance undertaken during the reporting period attributable to the Significant Amendment is shown in Table 6-24 below. As disturbance could not begin until the approval of the Jimblebar Significant Amendment Proposal referred under Part IV of the *EP Act*, the clearing during FY2026 is the total clearing to date under the Jimblebar Optimisation Project Revised Validation Notice (v3).

**Table 6-24 Jimblebar Significant Amendment Validation Notice Disturbance by habitat type**

| Habitat                          | Activity disturbance July 2025 to June 2026 (ha) | Total disturbance as of 30 June 2026(ha) | Total Predicted Disturbance (ha) |
|----------------------------------|--------------------------------------------------|------------------------------------------|----------------------------------|
| <b>Ghost Bat</b>                 |                                                  |                                          |                                  |
| <b>Critical roosting habitat</b> |                                                  |                                          |                                  |
| Gorge/Gully                      | 0.00                                             | 0.00                                     | 7.6                              |
| Breakaway/Cliff                  | 0.00                                             | 0.00                                     | 2.5                              |
| <b>Total</b>                     | <b>0.00</b>                                      | <b>0.00</b>                              | <b>10.1</b>                      |
| <b>Critical foraging habitat</b> |                                                  |                                          |                                  |
| Drainage Area/Floodplain         | 87.84                                            | 87.84                                    | 269.3                            |
| Mulga Woodland                   | 0.00                                             | 0.00                                     | 510                              |
| Major Drainage line              | 0.00                                             | 0.00                                     | 16                               |
| Minor Drainage Line              | 0.02                                             | 0.02                                     | 24.9                             |
| <b>Total</b>                     | <b>87.86</b>                                     | <b>87.86</b>                             | <b>820.2</b>                     |
| <b>Supporting habitat</b>        |                                                  |                                          |                                  |
| Sand Plain                       | 0.00                                             | 0.00                                     | 24.4                             |
| Stony Plain                      | 0.72                                             | 0.72                                     | 16.9                             |
| <b>Total</b>                     | <b>0.72</b>                                      | <b>0.72</b>                              | <b>41.3</b>                      |
| <b>Northern Quoll</b>            |                                                  |                                          |                                  |
| <b>Supporting habitat</b>        |                                                  |                                          |                                  |
| Hill Crest/Hill Slope            | 55.17                                            | 55.17                                    | 1,067.1                          |
| Sand Plain                       | 0.00                                             | 0.00                                     | 24.4                             |
| Stony Plain                      | 0.72                                             | 0.72                                     | 16.9                             |
| <b>Total</b>                     | <b>55.89</b>                                     | <b>55.89</b>                             | <b>1,108.4</b>                   |



Map 6-8 Jimblebar Significant Amendment Validation Notice - Habitat Disturbance FY2026

## 6.8 East Pilbara Surplus Water Drilling

The East Pilbara Surplus Water Drilling activity is located 62 km east of Newman and 16 km east of Jimblebar Mine, in the Pilbara Region of Western Australia (Activity Area).

The Activity is required to support the future management of surplus water which has been abstracted to allow mining below the water table at BHP's existing and proposed future eastern Pilbara hub iron ore operations. The aquifer testing that comprises the proposed Activity will inform the selection of the proposed future surplus water management infrastructure and design which will be the subject of future environmental approvals.

The Activity consists of a staged hydrogeological drilling and assessment program, for the purpose of assessing location suitability for potential water reinjection bores and discharge as part of the Eastern Pilbara Regional Surplus Water Project and Managed Aquifer Recharge (MAR) borefield.

The East Pilbara Surplus Water Drilling Validation Notice was first published for comment in July 2024 and came into effect on 13 November 2024. This section reports on 1 July 2025 to 30 June 2026.

### 6.8.1 Validation Notice Deviations

No non-compliances with the conditions of the Eastern Pilbara Surplus Water Drilling Validation Notice were identified during the reporting period.

### 6.8.2 Clearing Commitments

An update on the clearing commitments is outlined below.

#### Clearing limit commitments

BHP has implemented a ground disturbance management system over the project area during the reporting period. All disturbance has remained within the clearing limits as shown in Table 6-25 below.

#### Disturbance to Greater Bilby burrows/diggings commitments

Pre-clearance inspections were undertaken in the Activity Area on three occasions across the year in preparation for a test pumping program, new drilling pads and extensions of existing water sumps. These inspections did not find any evidence of Greater Bilby and were approved to proceed.

A 50 m exclusion zone has been placed around all historical burrows and diggings. All suspected new burrows/diggings will be subject to the same 50 m exclusion zone and further investigations to confirm identification of activity.

### 6.8.3 Management Commitments

An update on the management commitments is outlined below.

#### Implement discharge management plan:

The Discharge Management Plan is implemented and mandated through BHP's land disturbance system. Water quality is constantly monitored and tested before release to the environment, as dictated by the Discharge Management Plan. All water discharged to the environment during the reporting period met the water quality standards as dictated in the Discharge Management Plan.

All wetting fronts during the reporting period were within the predicted limits, as set out in the Discharge Management Plan. Discharge was also managed to prevent scouring and erosion by using scouring rock, containing discharge whenever possible and limiting discharge flow rates.

#### Implement fire management:

Smoking is not permitted anywhere within the Activity Area.

Hot work management procedures are in place through the BHP permitting system to ensure that any hot works across site comply with the BHP procedures and standards.

Across Jimblebar, fire breaks are implemented around powerline corridors, water pipelines, conveyors, and infrastructure to ensure that fire risks are managed appropriately. Fire break management is maintained through work orders which are scheduled between six to twelve months annually. Emergency services are available to support in the event of any fire incident.

#### Implement weed management:

Weed management and hygiene practises are implemented through the GLUP disturbance system. All clearing equipment is required to be cleaned and inspected before beginning ground disturbing works. Weed presence is

investigated through inspections of the work area and if required, formal weed mapping and treatment is implemented.

#### Implement speed restrictions:

Speed limits within the Activity Area gazetted to 40 km/hour and monitored by BHP's IVMS to reduce potential for risk of fauna strike and manage dust.

No speed exceedances were recorded in the Activity Area during the reporting period.

#### Implement feral animal management:

Opportunistic sightings of feral cats and foxes are reported to the Site Environmental Specialist and documented in the BHP Event Management System. There have been no feral cat or fox sightings, or incidents reported during the reporting period. A feral animal trapping program was not required during the reporting period as no opportunistic sightings were reported.

#### 6.8.4 Offsets

BHP provided the ten per cent advance payment based on the predicated total offset contribution in January 2025. Offsets applied to the loss of 45 ha of supporting habitat which supports foraging for the Greater Bilby, to achieve the Program Matter Objective. Disturbance of supporting habitat is outlined below in Table 6-25.

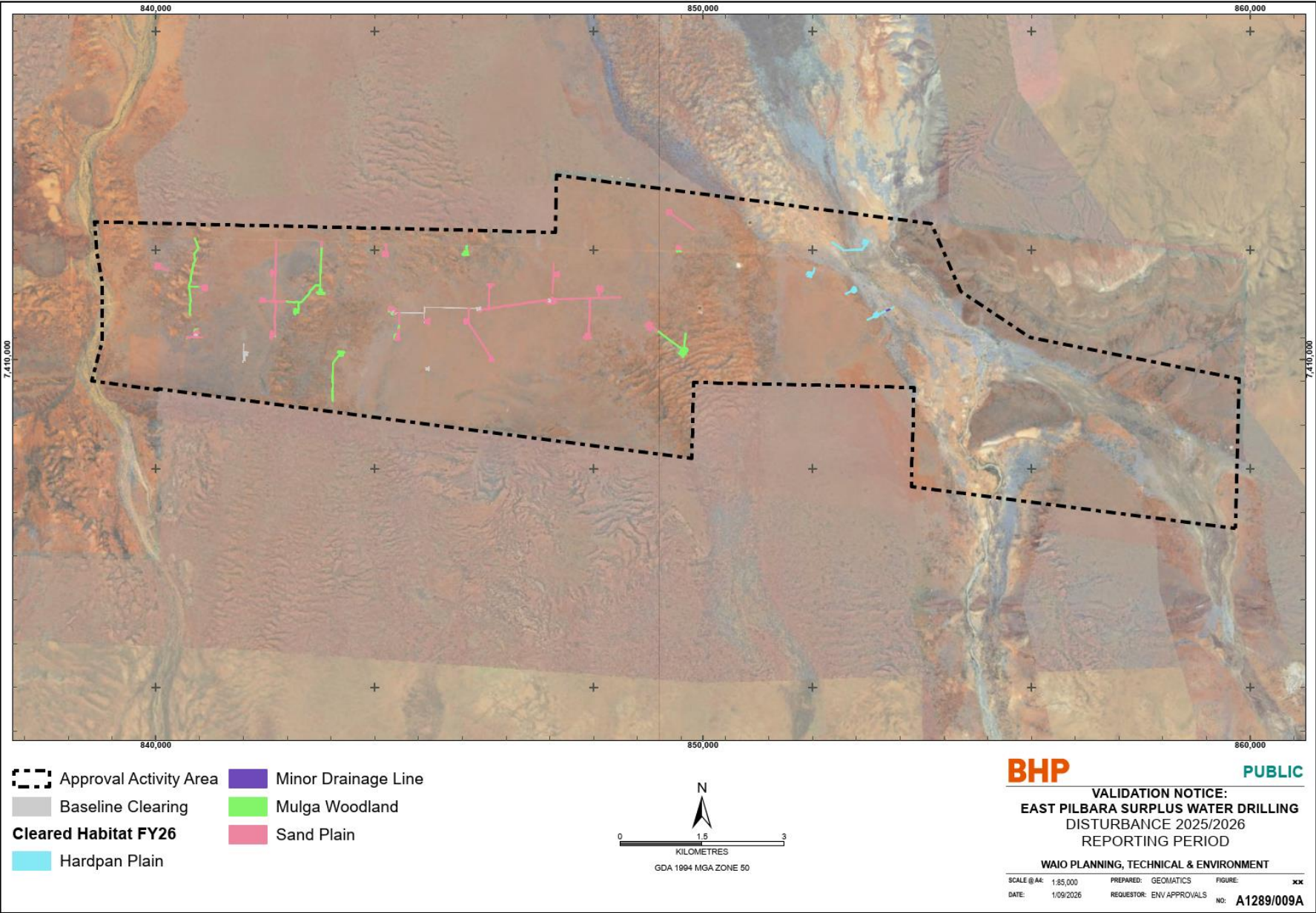
Implementation and achievements of offset programs undertaken by PEOF are shown on the [PEOF website](#). The implementation of current and future offset programs funded by BHPs contributions are discussed further in Section 1-5 above.

#### 6.8.5 Land Disturbance Reconciliation

Land disturbance is managed through an internal land use permit process which allows for management of clearing within approved limits and avoidance of habitats, where applicable. Clearing undertaken during the reporting period and a total of clearing to date is shown in Table 6-25 below.

**Table 6-25 East Pilbara Surplus Water Drilling disturbance by habitat type**

| Habitat                            | Activity disturbance July 2025 to June 2026 (ha) | Total disturbance as of 30 June 2026 (ha) | Total Predicted Disturbance (ha) |
|------------------------------------|--------------------------------------------------|-------------------------------------------|----------------------------------|
| <b>Greater Bilby</b>               |                                                  |                                           |                                  |
| <b>Supporting foraging habitat</b> |                                                  |                                           |                                  |
| Sand Plain                         | 21.26                                            | 25.78                                     | 29                               |
| Mulga Woodland                     | 9.48                                             | 9.63                                      | 15                               |
| Stony Plain                        | 0.00                                             | 0.00                                      | 1                                |
| <b>Total</b>                       | <b>30.74</b>                                     | <b>35.40</b>                              | <b>45</b>                        |



Map 6-9 East Pilbara Surplus Water Drilling Validation Notice - Habitat Disturbance FY2026

## 6.9 Orebody 25 West

The Orebody 25 West (OB25W) project is a satellite iron ore deposit located within BHP's Eastern Ridge iron ore mining operations, located 3.5 km to the north-east of Newman.

OB25 West is included in the SAA of the Program endorsed by the Minister responsible for administering the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) on 11 May 2017.

The OB25 West project includes the following:

- clearing of up to 175 ha of native vegetation
- drilling for resource definition and mine planning
- above water table mining of the OB25W deposit
- construction and operation of associated and supporting infrastructure
- construction and operation of an overburden storage area (OSA)
- closure, decommissioning and rehabilitation.

The OB25 West Validation Notice became effective on 28 April 2026. The Notifiable Action is forecast to commence in FY2027 with the commencement of on ground works and be completed within approximately 15 years, including construction, operation, rehabilitation and closure activities.

### 6.9.1 Validation Notice Deviations

No deviations from the Orebody 25 West Validation Notice were identified in the reporting period.

### 6.9.2 Program Matter Monitoring and Outcomes

The monitoring required during the FY2026 reporting period is outlined in Table 6-1. Monitoring results are discussed in the following sections.

**Table 6-26 Program Matter Monitoring Requirements for FY2026 Reporting Period**

| Species              | Monitoring                                               | Parameter                                                                                                   | Due Date                     | Performance Targets                                                                                   | Performance Target Met                              | Trigger Exceeded                 | Trends of Concern                                                                                                             | Applicable Program Matter Outcome                                                                                                                                                                     |
|----------------------|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------------------------------------------------|-----------------------------------------------------|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ghost Bat            | Land disturbance reconciliation                          | Disturbance to Ghost Bat critical and supporting habitat, and compliance with Mining Exclusion Zones (MEZs) | Annually                     | No unauthorised clearing within MEZs or beyond approved disturbance limits.                           | Yes<br><br>No unauthorised disturbance within MEZs. | No                               | No<br><br>New VN, no significant disturbance or blasting in activity area, no monitoring reports complete yet to show trends. | Minimise loss of critical and supporting habitats of the Ghost Bat as a result of Program Activities within the SAA; and no loss (or maintain) Ghost Bat colony(s) as a result of Program activities. |
|                      | Biannual cave monitoring at CER-06                       | Presence or evidence of Ghost Bat use                                                                       | Biannually during operations | Monitoring completed in accordance with the Validation Notice and outcomes used to inform management. | Yes<br><br>Monitoring of CER-06 complete.           | No                               | No<br><br>New VN, no significant disturbance or blasting in activity area, no monitoring reports complete yet to show trends. | No loss (or maintain) Ghost Bat colony(s) as a result of Program activities.                                                                                                                          |
|                      | Vibration monitoring for blasting within 300 m of CER-06 | Ground vibration at cave entrance                                                                           | During relevant blasting     | Vibration does not exceed 15 mm/s at CER-06, or adaptive management is implemented.                   | Yes<br><br>No blasting occurred this year.          | No                               | No<br><br>New VN, no significant disturbance or blasting in activity area, no monitoring reports complete yet to show trends. | Minimise loss of critical and supporting habitats of the Ghost Bat as a result of Program Activities within the SAA.                                                                                  |
| Pilbara Olive Python | Land disturbance reconciliation                          | Disturbance to Pilbara Olive Python critical and supporting habitat                                         | Annually                     | No unauthorised disturbance beyond the Activity Area and approved habitat disturbance limits.         | Yes<br><br>No disturbance beyond approved limits.   | No                               | No<br><br>New VN, no significant disturbance in activity area, no monitoring reports complete yet to show trends.             | Minimise loss of critical and supporting habitats of the Pilbara Olive Python as a result of Program Activities within the SAA.                                                                       |
|                      | Opportunistic records and vehicle strike reporting       | Sightings, secondary evidence and vehicle strike records                                                    | Ongoing during operations    | Records are reported and reviewed to inform adaptive management where required.                       | Yes<br><br>No vehicle strikes.                      | No<br><br>No reported sightings. | No<br><br>New VN, no significant disturbance in activity area, no monitoring reports                                          | Minimise loss of critical and supporting habitats of the Pilbara Olive Python as a result of Program Activities within the SAA.                                                                       |

| Species                | Monitoring                         | Parameter                                                                                                | Due Date                     | Performance Targets                                                                                   | Performance Target Met                        | Trigger Exceeded | Trends of Concern                                                                                             | Applicable Program Matter Outcome                                                                                                 |
|------------------------|------------------------------------|----------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------------------------------------------------|-----------------------------------------------|------------------|---------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
|                        |                                    |                                                                                                          |                              |                                                                                                       |                                               |                  | complete yet to show trends.                                                                                  |                                                                                                                                   |
| Pilbara Leaf-nosed Bat | Land disturbance reconciliation    | Disturbance to Pilbara Leaf-nosed Bat critical foraging and supporting habitat, and compliance with MEZs | Annually                     | No unauthorised clearing within MEZs or beyond approved disturbance limits.                           | Yes<br>No disturbance beyond approved limits. | No               | No<br>New VN, no significant disturbance in activity area, no monitoring reports complete yet to show trends. | Minimise loss of critical and supporting habitats of the Pilbara Leaf-nosed Bat as a result of Program Activities within the SAA. |
|                        | Biannual cave monitoring at CER-06 | Presence or evidence of Pilbara Leaf-nosed Bat use                                                       | Biannually during operations | Monitoring completed in accordance with the Validation Notice and outcomes used to inform management. | Yes<br>Monitoring of CER-06 complete.         | No               | No<br>New VN, no significant disturbance in activity area, no monitoring reports complete yet to show trends. | Minimise loss of critical and supporting habitats of the Pilbara Leaf-nosed Bat as a result of Program Activities within the SAA. |

### 6.9.3 Population Monitoring

Monitoring of Ghost Bat to date (described in Table 6-26) demonstrates that the following Program Matter Outcomes for Ghost Bat have been achieved for the reporting period:

*Minimise loss of critical and supporting habitats of the Ghost Bat as a result of Program Activities within the SAA*

*No loss (or maintain) Ghost Bat colony(s) as a result of program activities*

*Minimise loss of critical and supporting habitats of the Ghost Bat as a result of Program Activities within the SAA.*

Monitoring of Pilbara Olive Python (described in Table 6-26) similarly demonstrates that the following Program Matter Outcomes for Pilbara Olive Python have been achieved for the reporting period:

*Minimise loss of critical and supporting habitats of the Pilbara Olive Python as a result of Program Activities within the SAA.*

Monitoring of Pilbara Leaf-nosed Bat to date (described in Table 6-26) similarly demonstrates that the following Program Matter Outcomes for Leaf-nosed Bat have been achieved for the reporting period:

*Minimise loss of critical and supporting habitats of the Pilbara Leaf-nosed Bat as a result of Program Activities within the SAA.*

Monitoring results for Ghost Bat, Pilbara Olive Python and Pilbara Leaf-nosed Bat are discussed in the following sections.

#### 6.9.3.1 Ghost Bat and Pilbara Leaf-nosed Bat Monitoring

Following the commencement of this Validation Notice on 28 April 2026, a suitably qualified consultant was engaged to undertake biannual monitoring. Monitoring site CER-06 was inspected on 23 February 2026 for routine servicing of monitoring equipment and data retrieval. No evidence of Ghost Bat or Pilbara Leaf-nosed Bats were observed during the inspection.

Vibration monitoring results will be reported once blasting activities commence. Blasting within the OB25W area is currently scheduled to begin in January 2028.

#### 6.9.3.2 Pilbara Olive Python

Monitoring activities for Pilbara Olive Python are undertaken on a regional scale across Eastern mine operations, including within the Ophthalmia Dam catchment area and Newman Operations. There were no records or observations of Pilbara Olive Python reported during the reporting period, for the OB25 Activity Area.

### 6.9.4 Management Commitments

An update on the management commitments is outlined below. Further detail will be added once monitoring and implementation records are available.

#### Restrict human access to cave CER-06

Cave CER-06 has been identified as a high-value bat cave. Access is restricted through the application of a no-access buffer in internal permitting systems, which excludes the cave from all authorised work activities and permits, consistent with the avoidance commitments outlined in the Validation Notice.

#### No unauthorised disturbance within Mining Exclusion Zones

No updates during the reporting period.

#### Adaptive management for vibration exceedances at cave CER-06

No updates during the reporting period.

#### Implement feral cat management

All personnel are required to report opportunistic feral cat sightings to the Site Environmental Specialist. Reported sightings are recorded and assessed, and cage trapping is undertaken where required in accordance with BHP's feral animal management procedures. No feral cat management incidents requiring additional controls were reported during the reporting period.

#### Implement weed management

Weed hygiene controls were implemented throughout the reporting period. All new vehicles, mobile equipment and machinery were required to be cleaned prior to undertaking ground-disturbing activities. Work areas were

inspected for the presence of weeds, and where identified, appropriate weed mapping, monitoring and treatment actions were implemented in accordance with site weed management requirements.

### Restrict barbed wire fence usage

No barbed wire fencing was installed during the reporting period. Should barbed wire be required for legislative or operational reasons, its use would be limited to single-strand barbed wire fitted with bat deflectors to minimise the risk of impacts to Ghost Bats, consistent with the management commitment.

### Implement dust management

BHP implements dust management at Eastern Ridge in accordance with Part V Licence L6942/1997/13 (subject to the *Environmental Protection Act 1986* (WA)), including maintaining and operating dust controls such as water and bulk ore conditioning sprays, partial enclosures, stockyard and stacker sprays, water carts, chemical suppressants and speed restrictions. Continuous air quality and meteorological monitoring informs trigger investigations and operational responses, including additional suppression or modification of ore-handling activities where required.

### Implement fire management

Fire risk is managed through multiple controls across Eastern Ridge:

- Hot work management procedures are enforced via the BHP permitting system to ensure that any hot works across site complies with the BHP procedures and standards.
- Fire breaks are maintained around powerline corridors, water pipelines, conveyors, and infrastructure. These are managed through scheduled work orders occurring every six to twelve months.
- Designated smoking areas are available at crib huts and administrative buildings to ensure smoking is contained to specified areas and to reduce the risk of fire threats across site.

### 6.9.5 Offsets

Offsets are required for residual impacts to Ghost Bat, Pilbara Olive Python and Pilbara Leaf-nosed Bat habitat. The Validation Notice proposes offsets through the Pilbara Environmental Offsets Fund, including a 10% advance payment and subsequent biennial payments based on reconciled clearing. The required upfront offset payment has been made, with payment confirmed by receipt RR051542 against invoice RI007718 (deposit date 2 June 2026).

### 6.9.6 Land Disturbance Reconciliation

Disturbance undertaken within the Ghost Bat critical habitat and supporting habitat, Pilbara Olive Python critical and supporting habitat, Pilbara Leaf-nosed Bat supporting foraging habitat during the reporting period, is provided in Table 6-27.

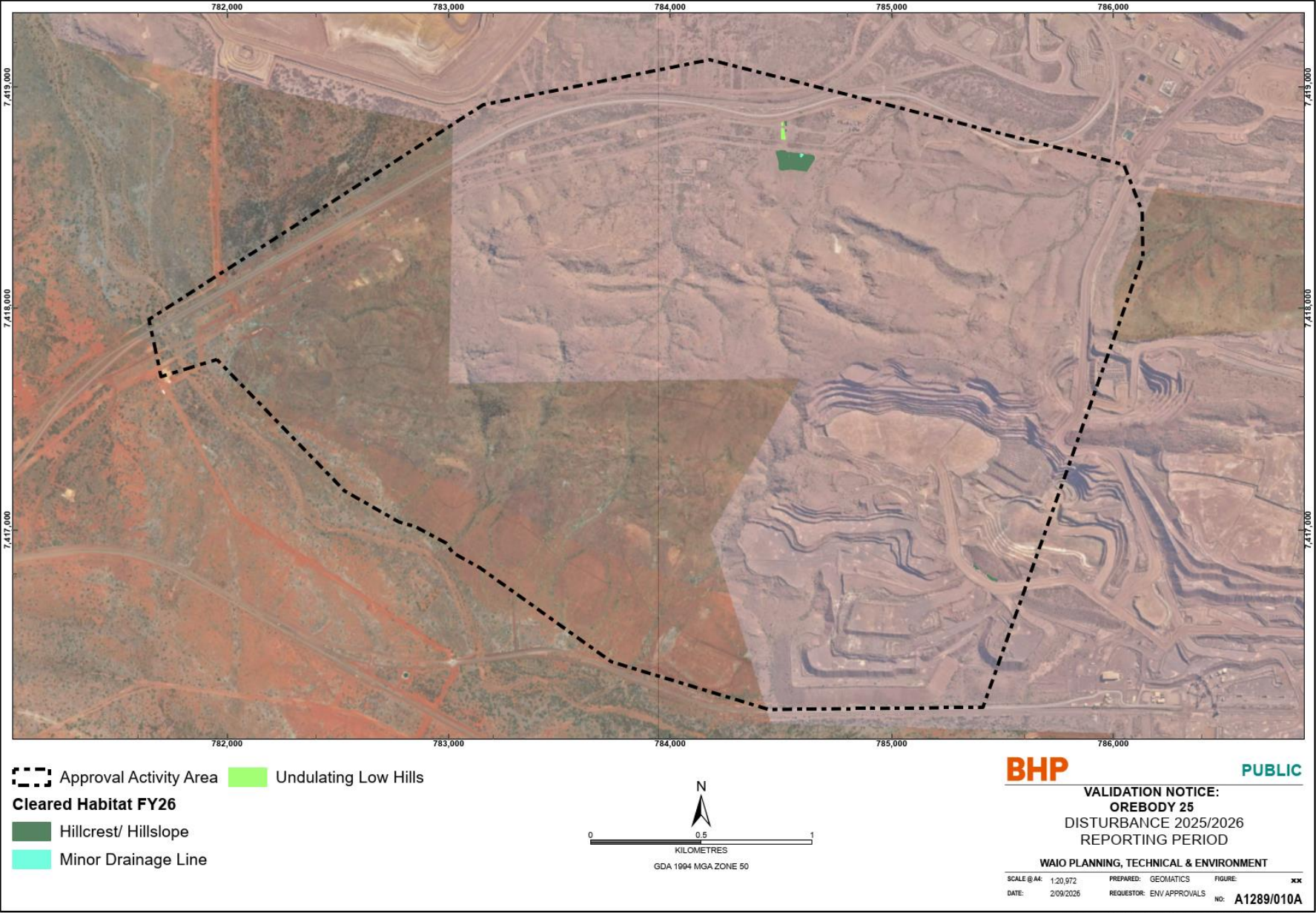
Land disturbance is managed through an internal land use permit process which allows for management of clearing within approved limits and avoidance of habitats, where applicable.

**Table 6-27 Orebody 25 West disturbance by habitat / Program Matter**

| Habitat / Program Matter       | Activity disturbance between April 2026 to June 2026 (ha) | Total disturbance as of 30 June 2026 (ha) | Total Predicted Disturbance (ha) |
|--------------------------------|-----------------------------------------------------------|-------------------------------------------|----------------------------------|
| <b>Ghost Bat</b>               |                                                           |                                           |                                  |
| Clearing of critical habitat   |                                                           |                                           |                                  |
| Breakaway/Cliff                | 0.00                                                      | 0.00                                      | 1.0                              |
| Gorge/Gully                    | 0.00                                                      | 0.00                                      | 3.0                              |
| <b>Total</b>                   | 0.00                                                      | 0.00                                      | 4.0                              |
| Clearing of supporting habitat |                                                           |                                           |                                  |
| Drainage Area/Floodplain       | 0.00                                                      | 0.00                                      | 2.8                              |
| Minor Drainage Line            | 0.01                                                      | 0.01                                      | 10.0                             |
| Sand Plain                     | 0.00                                                      | 0.00                                      | 0.1                              |
| Stony Plain                    | 0.00                                                      | 0.00                                      | 1.2                              |
| Undulating Low Hills           | 0.04                                                      | 0.04                                      | 12.8                             |
| <b>Total</b>                   | 0.05                                                      | 0.05                                      | 26.9                             |
| <b>Pilbara Olive Python</b>    |                                                           |                                           |                                  |
| Clearing of critical habitat   |                                                           |                                           |                                  |
| Breakaway/Cliff                | 0.00                                                      | 0.00                                      | 1.0                              |
| Gorge/Gully                    | 0.00                                                      | 0.00                                      | 3.0                              |
| <b>Total</b>                   | 0.00                                                      | 0.00                                      | 4.0                              |
| Clearing of supporting habitat |                                                           |                                           |                                  |

| Habitat / Program Matter       | Activity disturbance<br>between April 2026 to<br>June 2026 (ha) | Total disturbance as of 30<br>June 2026 (ha) | Total Predicted<br>Disturbance (ha) |
|--------------------------------|-----------------------------------------------------------------|----------------------------------------------|-------------------------------------|
| Drainage Area/Floodplain       | 0.00                                                            | 0.00                                         | 2.8                                 |
| Hillcrest/Hillslope            | 0.96                                                            | 0.96                                         | 139.4                               |
| Minor Drainage Line            | 0.01                                                            | 0.01                                         | 10.0                                |
| <b>Total</b>                   | <b>0.97</b>                                                     | <b>0.97</b>                                  | <b>152.2</b>                        |
| <b>Pilbara Leaf-nosed Bat</b>  |                                                                 |                                              |                                     |
| Clearing of supporting habitat |                                                                 |                                              |                                     |
| Breakaway/Cliff                | 0.00                                                            | 0.00                                         | 1.0                                 |
| Drainage Area/Floodplain       | 0.00                                                            | 0.00                                         | 2.8                                 |
| Gorge/Gully                    | 0.00                                                            | 0.00                                         | 3.0                                 |
| Hillcrest/Hillslope            | 0.96                                                            | 0.96                                         | 139.4                               |
| Minor Drainage Line            | 0.01                                                            | 0.01                                         | 10.0                                |
| Sand Plain                     | 0.00                                                            | 0.00                                         | 0.1                                 |
| Undulating Low Hills           | 0.04                                                            | 0.04                                         | 12.8                                |
| <b>Total</b>                   | <b>1.01</b>                                                     | <b>1.01</b>                                  | <b>169.1</b>                        |

Based on the information available at the time of preparing this section, no deviations from the Program or the OB25 West Validation Notice were identified during the reporting period.



Map 6-10 Orebody 25 West Validation Notice - Habitat Disturbance FY2026

## 6.10 Orebody 29/30/35 Validation Notice

The Orebody 29/30/35 mine, is located approximately 7 km west south-west of Newman, in the Pilbara Region of Western Australia and is located next to the existing Mt Whaleback mining operations.

The expansion area subject to the Validation Notice, is included in the SAA of the Program endorsed by the Minister responsible for administering the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) on 11 May 2017.

Under the Orebody 29/30/35 Validation Notice, the mine expansion includes the following key activities and elements:

- increase the rate of groundwater abstraction for mine dewatering at Orebody 29/30/35 from the previous authorised extent of 8 Gigalitres per annum (GL/a) to 24.5 GL/a
- increase the discharge of surplus water to Ophthalmia Dam from 8 GL/a to 20.8 GL/a
- construction and operation of a new surplus water pipeline to discharge additional surplus water to Ophthalmia Dam
- clearing of up to 116 hectares (ha) for the expansion of mine pits, additional OSAs, construction of pipeline and associated laydown areas, and a ramp.

The Orebody 29/30/35 Validation Notice became effective on 24 August 2025. During FY2026, implementation of the Notifiable Action commenced and compliance obligations were tracked in accordance with the Validation Notice.

### 6.10.1 Validation Notice Deviations

No deviations from the Orebody 29/30/35 Validation Notice were identified during the reporting period.

### 6.10.2 Program Matter Monitoring and Outcomes

Monitoring results will be included in the FY2027 AER, as FY2026 reports are not yet finalised.

Program matter monitoring requirements are outlined in the table below.

**Table 6-28 Program Matter Monitoring Requirements for FY2026 Reporting Period**

| Species   | Monitoring                      | Parameter                                                         | Due Date                                               | Performance Targets                                                                                                                      | Performance Target Met                                  | Trigger Exceeded | Trends of Concern                                        | Applicable Program Matter Outcome                                                                                   |
|-----------|---------------------------------|-------------------------------------------------------------------|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|------------------|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| Ghost Bat | Barbed wire fencing inspection  | Bat deflectors/reflectors installed where barbed wire is required | Post-installation/as required for barbed wire controls | Restrict barbed wire usage                                                                                                               | Yes<br><br>Barbed wire restricted within activity area. | No               | No<br><br>New VN, need further data to understand trends | Minimise loss of critical and supporting habitats of the Ghost Bat as a result of Program Activities within the SAA |
|           | Land disturbance reconciliation | Disturbance to Ghost Bat habitat and Category 4 caves             | Annually                                               | No disturbance to Category 4 Ghost Bat caves OB35-04 and OB35-05                                                                         | Yes                                                     | No               | No<br><br>New VN, need further data to understand trends | No loss/maintain Ghost Bat colony(s) as a result of program activities.                                             |
|           |                                 |                                                                   |                                                        | Clearing not to exceed 116 ha native vegetation including no more than 14.28 ha Ghost Bat critical habitat and critical foraging habitat | Yes<br><br>No disturbance beyond approved limits        | No               | No<br><br>New VN, need further data to understand trends |                                                                                                                     |

### 6.10.3 Management Commitments

An update on management commitments is outlined below.

#### Restrict barbed wire usage:

Barbed wire has been limited onsite to areas where required by legislation. Conditions are also applied through the land disturbance system to ensure that barbed wire is avoided, and where it is required to be used, only single strand barbed wire is used, with bat deflectors installed to deter Ghost Bats.

#### Implement fire management

Fire risk is managed through multiple controls across Newman West including Orebodies 29 30 35.

- Hot work management procedures are enforced via the BHP permitting system to ensure that any hot works across site complies with the BHP procedures and standards.
- Fire breaks are maintained around powerline corridors, water pipelines, conveyors, and infrastructure. These are managed through scheduled work orders occurring every six to twelve months.
- Designated smoking areas are available at crib huts and administrative buildings to ensure smoking is contained to specified areas and to reduce the risk of fire threats across site.

#### Implement weed management

Weed management and hygiene practises are implemented were implemented in accordance with the BHP WAIO Weed Management Procedure during the reporting period. In accordance with the procedure, a weed hygiene inspection and if required, clean was undertaken on earth-moving equipment before ground disturbing activities were undertaken. Annual weed survey and control programs were undertaken throughout the Activity area.

#### Implement feral animal control

Opportunistic sightings of feral cats are reported to the Site Environmental Specialist and/or documented in the BHP Event Management System. Trapping of feral cats was undertaken within Newman mine operations during FY2026. BHP plans to implement a wider targeted feral cat control across its tenure in FY2027.

#### Implement dust management measures

BHP implements dust management at Whaleback in accordance with Part V Licence L4503/1975/14 (subject to the *Environmental Protection Act 1986* (WA)), including maintaining and operating dust controls such as water sprays, dust extraction and collection systems, stockyard water cannons, water carts, chemical suppressants and speed restrictions. Continuous air quality and meteorological monitoring informs trigger investigations and operational responses, including additional suppression or modification of ore-handling activities where required.

### 6.10.4 Offsets

Offsets are required for residual impacts to Ghost Bat and Pilbara Olive Python habitat. BHP provided an initial ten per cent advance payment of the estimated financial offset contribution to the PEOF in December 2025. Offsets applied to the loss of 18.83 ha of critical habitat, supporting habitat and critical foraging habitat for the Ghost Bat, and 2.14 ha of supporting habitat for the Pilbara Olive Python, to achieve the Program Matter Objective.

Implementation and achievements of offset programs undertaken by PEOF are shown on the [PEOF website](#). The implementation of current and future offset programs funded by BHPs contributions are discussed further in Section 1-5 above.

### 6.10.5 Land Disturbance Reconciliation

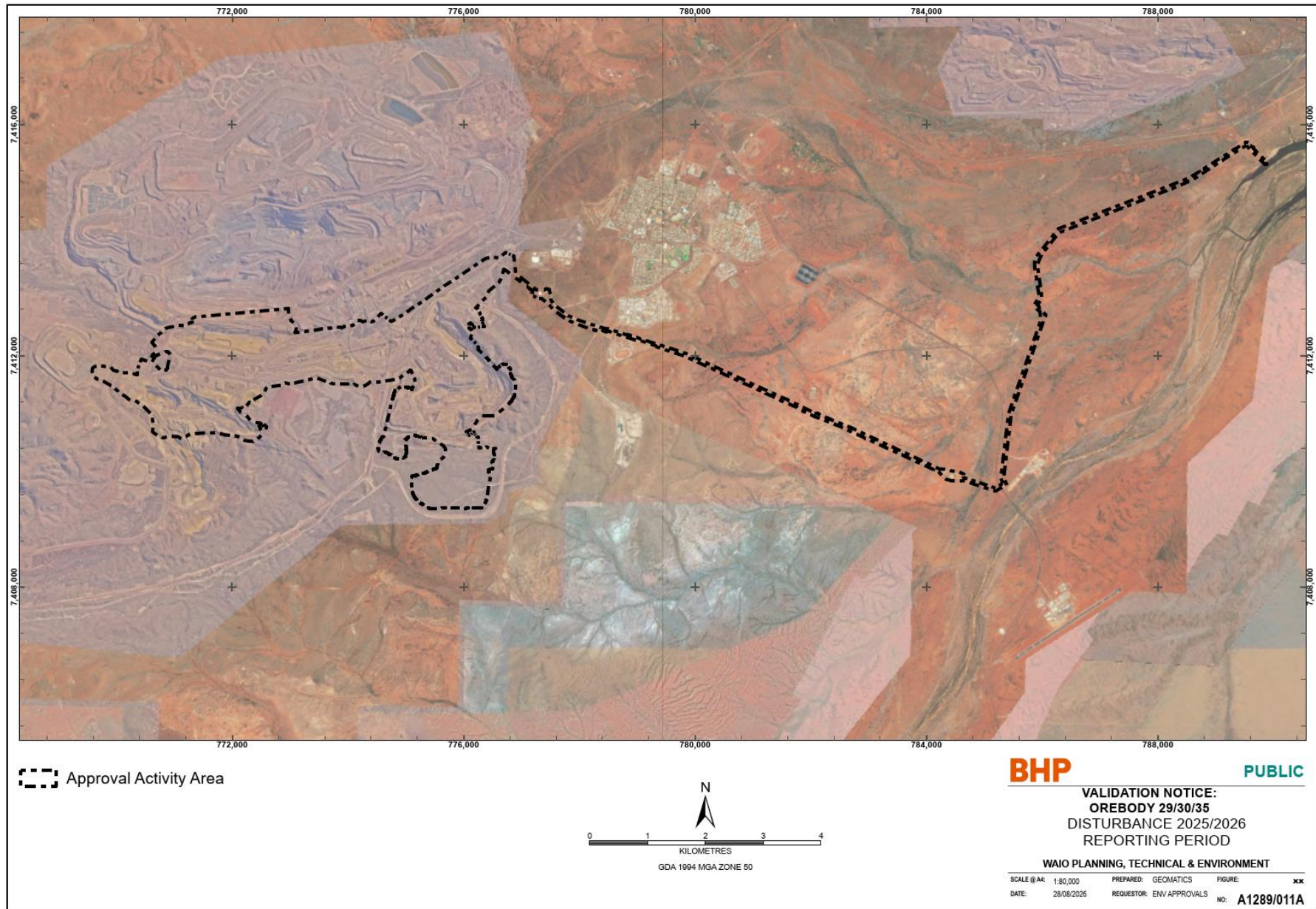
Disturbance undertaken within the Ghost Bat critical habitat and supporting habitat and Pilbara Olive Python critical and supporting habitat is provided in Table 6-29.

Land disturbance is managed through an internal land use permit process which allows for management of clearing within approved limits and avoidance of habitats, where applicable.

**Table 6-29 OB29/30/35 disturbance by habitat type / Program Matter**

| Habitat                                                                 | Activity disturbance<br>August 2025 to June<br>2026 (ha) | Total Disturbance from<br>August 2025 to June 2026<br>(ha) | Total Predicted<br>Disturbance (ha) |
|-------------------------------------------------------------------------|----------------------------------------------------------|------------------------------------------------------------|-------------------------------------|
| <b>Ghost Bat</b>                                                        |                                                          |                                                            |                                     |
| Clearing of critical habitat                                            |                                                          |                                                            |                                     |
| Breakaway/Cliff                                                         | 0.00                                                     | 0.00                                                       | 0.01                                |
| <b>Total</b>                                                            | <b>0.00</b>                                              | <b>0.00</b>                                                | <b>0.01</b>                         |
| Clearing of critical foraging habitat within 12 km of Category 2 roosts |                                                          |                                                            |                                     |
| Major Drainage Line                                                     | 0.00                                                     | 0.00                                                       | 0.17                                |
| Minor Drainage Line                                                     | 0.00                                                     | 0.00                                                       | 1.44                                |
| Sandy/Stony Plain                                                       | 0.00                                                     | 0.00                                                       | 0.36                                |
| Stony Plain                                                             | 0.00                                                     | 0.00                                                       | 12.3                                |
| <b>Total</b>                                                            | <b>0.00</b>                                              | <b>0.00</b>                                                | <b>14.27</b>                        |
| Clearing of supporting habitat                                          |                                                          |                                                            |                                     |
| Drainage Area/Floodplain                                                | 0.00                                                     | 0.00                                                       | 0.41                                |
| Wetland                                                                 | 0.00                                                     | 0.00                                                       | 0.05                                |
| Medium Drainage Line                                                    | 0.00                                                     | 0.00                                                       | 0.07                                |
| Stony Plain                                                             | 0.00                                                     | 0.00                                                       | 0.33                                |
| Sandy/Stony Plain                                                       | 0.00                                                     | 0.00                                                       | 3.69                                |
| <b>Total</b>                                                            | <b>0.00</b>                                              | <b>0.00</b>                                                | <b>4.55</b>                         |
| <b>Pilbara Olive Python</b>                                             |                                                          |                                                            |                                     |
| Clearing of critical habitat                                            |                                                          |                                                            |                                     |
| Breakaway/Cliff                                                         | 0.00                                                     | 0.00                                                       | 0.01                                |
| Wetland                                                                 | 0.00                                                     | 0.00                                                       | 0.05                                |
| <b>Total</b>                                                            | <b>0.00</b>                                              | <b>0.00</b>                                                | <b>0.06</b>                         |
| Clearing of supporting habitat                                          |                                                          |                                                            |                                     |
| Hillcrest/Hillslope                                                     | 0.00                                                     | 0.00                                                       | 0.40                                |
| Major Drainage Line                                                     | 0.00                                                     | 0.00                                                       | 0.17                                |
| Medium Drainage Line                                                    | 0.00                                                     | 0.00                                                       | 0.07                                |
| Minor Drainage Line                                                     | 0.00                                                     | 0.00                                                       | 1.44                                |
| <b>Total</b>                                                            | <b>0.00</b>                                              | <b>0.00</b>                                                | <b>2.08</b>                         |

Based on the information available at the time of preparing this section, no deviations from the OB29/30/35 Validation Notice were identified during the reporting period.



**Map 6-11 Orebody 29/30/35 Validation Notice - Habitat Disturbance FY2026**