

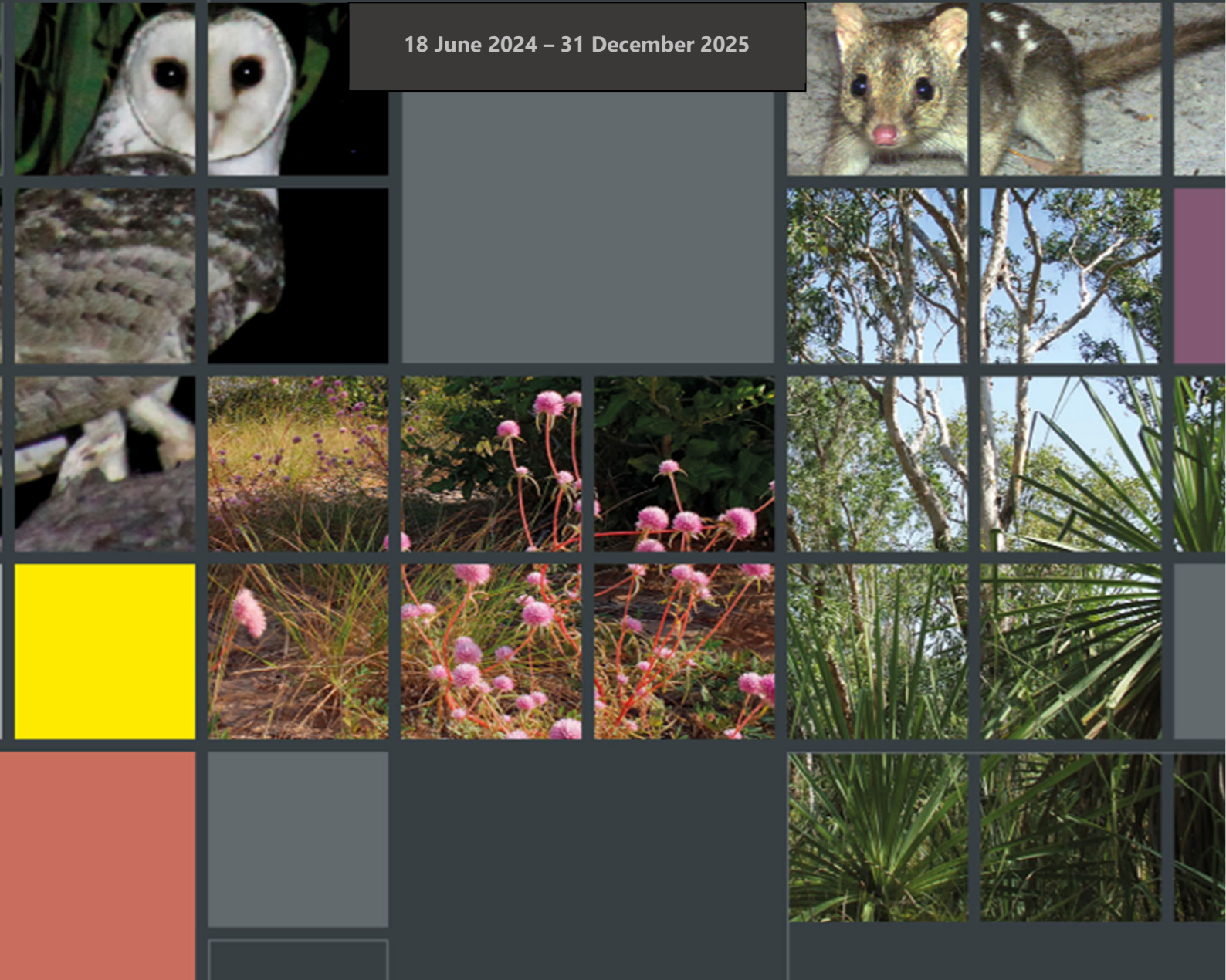


GROOTE EYLANDT MINING COMPANY (GEMCO)

EASTERN LEASES PROJECT (EPBC 2014/7228)

BIODIVERSITY OFFSETS RECONCILIATION REPORT

18 June 2024 – 31 December 2025



DOCUMENT CONTROL

OWNER OF THIS REPORT:

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VERSION HISTORY:

VERSION	DESCRIPTION OF CHANGES	DATE
0	Draft	18/03/2026
1	Final	25/03/2026

PERSONS INVOLVED IN THE REVIEW OF THIS REPORT INCLUDE:

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PERSONS AUTHORISING THIS REPORT:

NAME	TITLE	SIGNATURE	DATE
Robyn Ryan	VP Operations GEMCO	<i>Robyn Ryan</i>	25/3/2026

COVER PAGE AND DECLARATION OF ACCURACY

EPBC NUMBER	EPBC 2014/7228
PROJECT NAME	Eastern Leases Project
PROPONENT/APPROVAL HOLDER AND ACN OR ABN	Groote Eylandt Mining Company Pty Ltd (GEMCO) ABN: 26 004 618 491
THE APPROVED ACTION	Developing an open cut mine in the Eastern Leases (ML31219 and ML31220) and linking the Eastern Leases to the existing GEMCO Mine via new haul roads on Access Authority AA31711
LOCATION OF THE ACTION	Groote Eylandt, Northern Territory
DATE OF PREPARATION OF THE BIODIVERSITY OFFSETS RECONCILIATION REPORT	25/03/2026
PERSON ACCEPTING RESPONSIBILITY FOR THIS REPORT	Robyn Ryan, VP Operations GEMCO

I declare that:

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

Signed

Robyn Ryan

Full name (please print)

Robyn Ryan

Organisation (please print)

Groote Eylandt Mining Company

Date 25 / 3 / 26

ACKNOWLEDGEMENT

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

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

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

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GLOSSARY

Term/Abbreviation	Description
ALC	The Anindilyakwa Land Council. This is the land council responsible for Groote Eylandt.
ALC Rangers	Anindilyakwa Land Council Land & Sea Rangers. This is the Ranger group.
BOMP	Biodiversity Offsets Management Plan for the Eastern Leases project.
BOS	Biodiversity Offsets Strategy for the Eastern Leases project.
Darwin CPI	Darwin Consumer Price Index.
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water.
DEPWS	Northern Territory Department of Environment, Parks and Water Security. Department functions now replaced by DLPE.
DLPE	Northern Territory Department of Lands, Planning and Environment.
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth).</i>
Foundation Period	The first two years of the biodiversity offsets program being the 17 June 2022 to 17 June 2024. The first Impact Reconciliation Report covered this period.
GEMCO	Groote Eylandt Mining Company Pty Ltd.
High Priority Weeds	The eleven weed species that are the focus of offsets management in the BOMP.
NAIDOC	National Aborigines and Islanders Day Observance Committee
NIAA	National Indigenous Australians Agency
Offset management area	The area of Groote Eylandt beyond the GEMCO weed management area. Offsets programs will be undertaken within this area.
Reporting Period	The period of time that the Impact Reconciliation Report accounts for. In the case of this current report, the reporting period is 18 June 2024 – 31 December 2025.
TARP	Trigger Action Response Plan

1 INTRODUCTION

1.1 BACKGROUND

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

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

These requirements are addressed in this report. This Biodiversity Offsets Reconciliation Report is the second such report prepared for the project and is for a reporting period from 18 June 2024 to 31 December 2025. The report is structured as follows:

- Section 1 – Provides a brief overview of the Eastern Leases Project, the biodiversity offsets program, contextual information relevant to the report and a summary of the requirements for the reconciliation report, including cross references to where these requirements have been addressed.
- Section 2 – Provides an account of the number of hectares cleared and the value of the offset funds generated in the reporting period.
- Section 3 – Describes the offsets activities that were undertaken during the reporting period and the targets achieved.
- Section 4 – Provides a forward two-year work program for June 2026 to June 2028.
- Section 5 – Considers adaptive management in relation to the offsets program, and whether any adjustments to the program are required.

1.2 EASTERN LEASES PROJECT

Groote Eylandt is Australia's fourth largest island, with a land area of approximately 2,285 km², and is largely undeveloped. GEMCO's existing manganese mine is the main development on the island. There are three townships on Groote Eylandt, namely Alyangula, Angurugu and Umbakumba, as well as several smaller satellite communities (**Figure 1**). Groote Eylandt is Aboriginal land under the *Aboriginal Land Rights (Northern Territory) Act 1976* (Cth) (ALRA). The Anindilyakwa Land Council (ALC) is responsible for managing this Aboriginal land.

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

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

1.3 BIODIVERSITY OFFSETS

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

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

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

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

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

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

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

where more offset funds are spent than are generated. In the Foundation Period, for example, there was a significant amount of vegetation clearing needed for the construction phase of the mining activities, but a proportionally lower amount of offset funding required to be spent. This was due to the primary focus of the Foundation Period being establishing an approved BOMP, as well as the necessary agreements between GEMCO, the ALC and other stakeholders to implement the offsets program.

1.4 CONTEXT FOR THE REPORTING PERIOD

The previous Impact Reconciliation Report (submitted 22 August 2024 and approved 21 October 2024 by DCCEEW), covered the 'Foundation Period' of the offsets program, which is the first two years from the commencement of the Eastern Leases Project (17 June 2022 to 17 June 2024). The focus of the Foundation Period was to establish an approved, detailed management plan for the offsets program in consultation with the ALC and the Northern Territory Government, and to establish the necessary systems to start implementing the offsets program. A key focus of the Short-term Period is to ensure that major infestations of high priority weeds on Groote Eylandt have been contained, through weed treatment and further survey of known sites, demonstrating no spread of these weeds beyond areas mapped in the foundation stage. The BOMP contains a detailed account of the offset actions to be undertaken during all periods and the outcomes to be achieved, including specific targets for each outcome.

This current report is the second Impact Reconciliation Report, and should be read in conjunction with the BOMP and the Foundation Period Impact Reconciliation Report.

In preparing this Impact Reconciliation Report, it is considered relevant to recognise that for a significant portion of 2024-2025 that GEMCO was focused on operational recovery from the impacts of Tropical Cyclone Megan (and its associated Tropical Low) that impacted Groote Eylandt in March 2024. The Milner Bay wharf was significantly damaged during the event, and subsequently rebuilt, which resulted in approximately 18 months without ore product shipping for GEMCO operations.

Despite this impact to operations, GEMCO has continued with the BOMP work plan during the reporting period. This included, notably, the recruitment of the Plant Biosecurity Officer (Coordinator) sponsored position under the program, within the ALC Land and Sea Rangers.

1.5 REQUIREMENTS FOR THE RECONCILIATION REPORT

GEMCO is required to prepare and submit an Impact Reconciliation Report to DCCEEW every second year under Condition 13 of the EPBC Act approval. As required in Condition 13(b) of the EPBC Act approval, the first Foundation Period report was submitted on 22 August 2024, and subsequent reports must be submitted by 30 March every two years.

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

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

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

2 RECONCILIATION OF CLEARING, OFFSET FUNDS AND OFFSET PROGRAMS

2.1 CLEARING ACTIVITIES

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

For the reporting period 18 June 2024 to 31 December 2025, a total of 161.66 ha of native vegetation was cleared for exploration and mining. **Figures 2** and **3** show the geographical extent of clearing in the reporting period, and **Table 2** shows the total amount of clearing completed in each quarter.

2.2 CALCULATION OF BIODIVERSITY OFFSET FUNDS

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

At the time of the EPBC Act approval (June 2016), the Darwin CPI was 108.3 points. Quarterly changes in Darwin CPI have been used to recalculate the value of offset funds for each given quarter clearing occurred, using the following formula:

$$\text{(Darwin CPI (quarter in which clearing occurred) } \div \text{ Darwin CPI (previous quarter) } \times \text{ \$Offset Funds per Hectare for Previous Quarter} = \text{Offset Funds Per Hectare (for given quarter)}$$

Updated CPIs have been used for each quarter of clearing for the reporting period for the current report, as shown in **Table 2**. The value of the biodiversity offset funds for the commencement of the reporting period (in June 2024) was calculated in the previous Impact Reconciliation Report as \$5,551.25 AUD per hectare, which provides the starting value in **Table 2**.

2.3 BIODIVERSITY OFFSET FUNDS GENERATED IN THE REPORTING PERIOD

The total value of the biodiversity offset funds generated in the reporting period is \$911,424. A detailed breakdown of these funds is provided in **Table 2**, which shows the hectares cleared, the Darwin CPI at the time of clearing, the CPI adjusted offset funds per hectare and the total offset funds per quarter.

It should be noted that the Australian Bureau of Statistics (ABS) transitioned to a monthly CPI in December 2025, and this has required re-referencing and aligning quarterly index numbers. The quarterly index numbers are now presented on an index reference period of September month 2025 = 100.00 and published to two decimal

places. This change, while resetting the reference starting point, has not changed the percentage movements (increases / decreases) between the periods.

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

Quarter	Darwin CPI	Offset Funds per hectare	Hectares cleared	Offset Funds generated
June 2024	133.6	\$5,551.25	9.15	\$50,793.94
September 2024	133.8	5562.35	37.44	\$208,254.38
December 2024	133.7	5556.79	10.89	\$60,513.44
March 2025	134.6	5606.80	43.17	\$242,045.56
June 2025	135.7 (98.36)^	5668.47	18.16	\$102,939.42
September 2025	100.00	5761.43	42.85	\$246,877.28
December 2025	100.71	5802.34	0	0
Current Reporting Period			161.66	\$911,424
<i>Previous Reporting Period</i>			<i>189.79</i>	<i>\$1,013,007</i>
Total (All Reporting Periods)			351.45	\$1,924,431

^98.36 is the recalculated CPI for June 2025, based off the new reference value of 100.00 for September 2025, to permit calculation for change between June and September 2025 reference reset.

2.4 OFFSET FUNDS SPENT DURING THE REPORTING PERIOD

A total of \$646,056 was spent on biodiversity offset programs during the reporting period.

Three major bodies of work / milestones were completed using biodiversity offset funds in the reporting period, specifically:

1. Recruitment of the Plant Biosecurity Officer role. The Officer was recruited in early November 2024 and commenced work on 27 November 2024.
2. A second large-scale island-wide weed survey, conducted by qualified botanists (consultants) with experience in the identification of transforming weeds in the Northern Territory and on Groote Eylandt, which was conducted 20 May to 24 June 2025. This body of work is described in Sections 5 and 6.4 of the BOMP. The two-year weed surveys remain key to understanding status of the distribution, density and type of transforming weeds, and allowing GEMCO the ability to adequately plan, prioritise and strategically manage high priority weeds to meet the objectives of the BOS.
3. Weed treatment campaigns were conducted in the previous period in April-May 2024, then in the current reporting period in mid-April 2025 to late June 2025, and from early Dec 2025 to the end of the reporting period. This is the second year of weed control work for the program, strategically targeting infestations of high priority weeds were mapped during the island-wide weed surveys.
4. Development of the first BOMP Weed Management Plan for the ALC – encompassing the 11 BOMP weeds and including weed risk profiles – in September 2025.

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

TABLE 3 BIODIVERSITY OFFSET FUNDS SPENT DURING THE REPORTING PERIOD

Date	Project	Activity or Goods	Spent \$AUD
Jun 2024	Weed Treatment	Contract Labour	48,559
		Chemical Supplies / Equipment	10,875
Jul 2024	Weed Treatment	Contract Labour	37,837
		Chemical Supplies / Equipment	8,700
Aug 2024	Weed Treatment	Contract Labour	2,845
		Chemical Supplies / Equipment	435
Dec 2024	Weed Treatment	Chemical Supplies / Equipment	6,292
		Freight	100
Apr 2025	Weed Treatment	Flights	1890 (6 flights)
		Accommodation	2370 (30 nights)
May 2025	Weed Treatment	Flights	1260 (4 flights)
		Accommodation	4345 (55 nights)

Date	Project	Activity or Goods	Spent \$AUD
		Chemical Supplies / Equipment	25,897
		Freight	1,400
Jun 2025	Weed Treatment	Flights	1890 (6 flights)
		Accommodation	2528 (32 nights)
		Contract Labour	83,418
		Freight	6,578
Jul 2025	Weed Treatment	Contract Labour	73,750
		Chemical Supplies / Equipment	13,074
		Freight	5,722
Dec 2025	Weed Treatment	Flights	1260 (4 flights)
		Accommodation	2212 (28 nights)
TOTAL WEED TREATMENT			\$343,237
May 2025	Weed Survey	Flights	1260 (4 flights)
		Accommodation	1106 (14 nights)
Jun 2025	Weed Survey	Contract Labour	47,262
		Flights	4410 (14 flights)
		Accommodation	4424 (56 nights)
July 2025	Weed Survey	Contract Labour	108,420
Sept 2025	Weed Survey	Contract Labour	17,820
Dec 2025	Weed Survey	Contract Labour	1,155
TOTAL WEED SURVEY			\$185,857
Jun 2024 – Dec 2025	Plant Biosecurity Officer Position	Wages	83,419
	Plant Biosecurity Officer Position	Vehicle Hire	21,059
	Plant Biosecurity Officer Position	Equipment	8,492
	Plant Biosecurity Officer Position	Freight	3,178
	Plant Biosecurity Officer Position	PPE, Medical	814
PLANT BIOSECURITY OFFICER POSITION			\$116,962
Spent – Current Reporting Period			\$646,056
<i>Spent – Previous Reporting Period</i>			\$365,007
Total Spent (Previous and Current Reporting Periods)			\$1,011,063

Note – monies spent reporting aligns with invoicing date, and not necessarily when services were completed or goods received. For example, weed treatment expenditure in Jun-Aug 2024 was for control activities conducted in the previous reporting period.

The forecast biodiversity offset monies to be spent during the remainder of the Short-term Period (January 2026 to June 2027) and the Medium-term Period (June 2027 to June 2032) will be higher than previous periods, primarily due to:

- Full development and implementation of structured weed management training modules that are tailored specifically for the needs of the Traditional Owners.
- Full implementation of the community awareness program.

Mining in the Eastern Leases is currently scheduled to be completed around in FY32, which is consistent with the approved lifespan of the BOMP.

3 BOMP OUTCOMES ACHIEVED

3.1 INTRODUCTION

Each management action described in the BOMP has a series of targets associated with it, with the targets to be achieved by the end of each time period (summarised in BOMP Section 6, Table 2). This Impact Reconciliation Report reports on the management action targets from the end of the Foundation Period to December 2025. **Table 4** provides the management action targets from the BOMP and describes progress made towards meeting these targets.

As indicated in **Table 4**, all targets have been fully met for the Foundation Period and for this reporting period (which forms part of the Short-Term Period of the BOMP), with the exception of those discussed below, that are considered to be in progress (partially complete):

- Implementation of quarantine system improvements.
- Community awareness – development of awareness materials in an appropriate format.
- Treating all known and new infestations of Annual Mission Grass.
- Monitoring all populations of Guinea Grass identified in the foundation period.

Further details on progress for these targets is provided in **Table 4** below.

In the previous Impact Reconciliation Report, it was noted that a single infestation of Para Grass could not be accessed for treatment during the 2024 weed treatment program due to cultural reasons (i.e. Sorry Business). The infestation was checked in each subsequent weed treatment campaign during this reporting period, and successfully treated.

3.2 TABLE OF BOMP TARGETS

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

Biodiversity Offset Management Targets	Period Targets	Reporting Status
Foundation Period		
Plant Biosecurity Officer	Plant Biosecurity Officer has been recruited	Complete. Recruitment of the Plant Biosecurity Officer was completed in early November 2024.
Weed Control and Monitoring Targets - Para Grass	Treat 100% of plants in any infestations located during the BOMP weed surveys	Complete. All records of Para Grass were checked and treated during the 2024 weed treatment program with the exception of one infestation on the Angurugu River, which could not be accessed due to cultural reasons. This infestation was visited and treated in each weed campaign during the current reporting period.
Short-Term Period		
Island-Wide Weed Mapping Survey	Repeat island-wide weed mapping survey every two years	Complete. The 2025 survey was undertaken between 20 May to 24 June 2025. The data from the survey informed strategic prioritisation of the weed treatment program. The results of completed weed surveys have been incorporated into the BOMP actions and targets.
Weed Management Plan	Finalise Weed Management Plan once the BOMP has been approved	Complete. The BOMP Weed Management Plan for the ALC, inclusive of the BOMP target weeds and prepared using the results of the island-wide weed survey, was completed in the reporting period. The document is subject to final approval, and will continue to be refined during the course of the BOMP lifespan.
Plant Biosecurity Officer	Plant Biosecurity Officer role is filled	Complete. Recruitment of the Plant Biosecurity Officer was completed in this reporting period, with the Officer commencing work on 27 November 2024 (employment continuing).
Weed Control and Monitoring Targets - Gamba Grass	Continue to monitor infestation sites for recurrence	Complete. The site of the 2023 treated Gamba Grass infestation, along with all known sites from the previous 5 years, were checked for Gamba Grass recurrence during the 2025 weed treatment program.
	Monitor the offset management area for new infestations via the two-yearly island-wide weed survey	Complete. There have been no new infestations recorded during the reporting period.

Biodiversity Offset Management Targets	Period Targets	Reporting Status
	Treat 100% of plants in any new infestations discovered	N/A – no new infestations have been recorded during the reporting period.
Weed Control and Monitoring Targets - Grader Grass	Continue to monitor the roadside infestation sites for recurrence	Complete. The known roadside sites will be continue to be monitored and controlled in each weed treatment campaign.
	Monitor the offset management area for new infestations via the two-yearly island-wide weed survey	Complete. Other infestations have been recorded and treated, particularly the Telstra fibre optic alignment along Umbakumba Road and gravel pits / quarries in and around Angurugu.
	Treat 100% of plants in any new infestations discovered	Complete. Other infestations are expected to be recorded and treated as weed surveys continue across the island.
	Ensure that the Angurugu population does not expand beyond the area in which the species was located during the BOMP weed surveys	Complete. The Grader Grass stand at Angurugu has contracted with ongoing weed treatment. This area will continue to be monitored.
Weed Control and Monitoring Targets – Annual Mission Grass	Continue to monitor treated infestation sites for recurrence	In progress. The island distribution of Annual Mission Grass is high, and will continue to be a significant target for the BOMP over its lifespan.
	Treat 100% of plants in isolated populations (i.e. beyond townships).	In progress. Certain known isolated populations have not currently been accessible to-date due to track conditions and cultural restrictions.
	Monitor the offset management area for new infestations via the two-yearly island-wide weed survey	Complete. It is expected that sites with Annual Mission Grass will continue to be identified in subsequent weed surveys of new areas.
	Treat 100% of plants in any new infestations discovered	In progress. Certain known isolated populations have not currently been accessible to-date due to track conditions and cultural restrictions. The island distribution of Annual Mission Grass is high, and will continue to be a significant target for the BOMP over its lifespan.
Weed Control and Monitoring Targets – Perennial Mission Grass	Continue to monitor prior infestation sites for recurrence.	Complete. All known sites were visited in the 2025 weed treatment and survey campaigns.
	Monitor the offset management area for new infestations via the two-yearly island-wide weed survey	Complete. It is expected that sites of Perennial Mission Grass will continue to be identified in subsequent weed surveys of new areas.

Biodiversity Offset Management Targets	Period Targets	Reporting Status
	Treat 100% of plants in any new infestations discovered	Complete. These sites will be revisited in 2026 to evaluate effectiveness of the control.
Weed Control and Monitoring Targets – Guinea Grass	Continue to monitor the populations that were treated in the foundation period for recurrence	In progress. The island distribution of Guinea Grass is high, and will continue to be a significant target for the BOMP over its lifespan.
	Monitor the offset management area for new infestations via the two-yearly island-wide weed survey	Complete. It is expected that sites of Guinea Grass will continue to be identified in subsequent weed surveys of new areas.
	Treat 100% of plants in any new infestations discovered	Complete. These sites are planned to be revisited in 2026 to evaluate effectiveness of the prior control.
	Ensure that the township populations do not expand beyond the area in which the species was located during the BOMP weed surveys	Complete – these areas were a key focus for the 2025 campaigns. Populations of Guinea Grass are extensive in some townships, and will continue to present a challenge in terms of containment. The township areas will be revisited in 2026 to evaluate effectiveness of 2025 control activities.
Weed Control and Monitoring Targets – Para Grass	Continue to monitor prior infestations sites for recurrence	Complete. All known sites were visited in the 2025 weed treatment and survey campaigns.
	Monitor the offset management area for new infestations via the two-yearly island-wide weed survey	Complete. It is expected that sites of Para Grass will continue to be identified in subsequent weed surveys of new areas.
	Treat 100% of plants in any new infestations discovered	Complete. Other infestations are expected to be recorded and treated as weed surveys continue across the island.
Weed Control and Monitoring Targets – Buffel Grass	Continue to monitor prior infestations sites for recurrence	Complete. All known sites were visited in the 2025 weed treatment and survey campaigns.
	Monitor the offset management area for new infestations via the two-yearly island-wide weed survey	Complete. It is expected that sites of Buffel Grass will continue to be identified in subsequent weed surveys.
	Treat 100% of plants in any new infestations discovered	Complete. Other infestations are expected to be recorded and treated as weed surveys continue across the island.

Biodiversity Offset Management Targets	Period Targets	Reporting Status
Weed Control and Monitoring Targets – Fountain Grass, Olive Hymenachne, Thatch Grass, Molasses Grass	Monitor the offset management area for new infestations via the two-yearly island-wide weed survey	Complete. No records of these species have been made during the reporting period.
	Groote Eylandt remains free of these species	Complete – Groote Eylandt continues to remain free of these species, based on the information available.
Quarantine System	Undertake detailed audit of quarantine system and recommend improvements	Complete. A review with recommendations was conducted by the Plant Biosecurity Officer in October 2025. Refer to Section 5 for key adjustments / adaptive management items for the program.
	Quarantine system improvements implemented	<p>In progress. Some improvements already completed/implemented include:</p> <ul style="list-style-type: none"> • Identifying priority BOMP and NT Class A weeds within transport hubs on Groote Eylandt. • Concurrent inspections with the cane toad biosecurity program including awareness sessions and feedback delivered on biosecurity improvements recommended / required to external parties (e.g. freight operators, AHAC, GCC Contracting). <p>Further recommendations were identified that have been included in the forward work plan (Section 4), with adaptive management / adjustment items also discussed in Section 5 of this report.</p>
	Risk profiles for high priority weeds developed	Complete. These were developed for the 11 BOMP weeds and are included in the BOMP Weed Management Plan that has now been developed.
Trigger Action Response Plan	Standalone TARP procedure developed	Complete. This was developed in August 2025 and communicated to the ALC Rangers and relevant staff.
	TARP procedure implemented in the event of new incursions of high priority weeds	N/A –TARP has not yet been triggered.
Community Awareness	Awareness materials are developed in an appropriate format	In progress. In the reporting period, key awareness materials including weed identification training materials and presentations have been developed and utilised. Further awareness materials will continue to be progressively developed and tailored to target different stakeholder groups and Traditional Owners.

Biodiversity Offset Management Targets	Period Targets	Reporting Status
	Awareness events and sessions are held as per the schedule developed in the annual planning sessions	Complete. Key awareness events have included NT Picnic Day, NAIDOC (National Aborigines and Islanders Day Observance Committee) Week (Umbakumba and Alyangula), and the Community Children’s Christmas Party held by GEMCO in Alyangula.
Training and Capacity Building	An annual training program is established and implemented that offers an appropriately tailored set of weed management courses to ALC Rangers and staff	Complete. A weed management training program has been developed and implemented for ALC Rangers and staff. It should be noted that current funding received by the ALC Rangers from the National Indigenous Australians Agency (NIAA) has met, and continues to meet, all requirements for ALC training. As such, to further the goals of the BOMP for training and capacity building, it is proposed to expand training offerings to key external stakeholders with weed / land management responsibilities on Groote Eylandt (refer to Section 5) for further detail).

4 TWO-YEAR FORWARD WORK PLAN (JUNE 2026 – JUNE 2028)

4.1 INTRODUCTION

The two-year forward work plan, presented in **Table 5**, has been developed in consultation with the ALC during the development of this Impact Reconciliation Report.

According to the BOMP timeframes (Section 3.4 of the BOMP), the forward work plan presented below represents the last year of the Short-term Period and the first year of the Medium-term Period. The actions proposed for the forward work plan in **Table 5** have been designed to ensure that the work undertaken is aligned to the work plan put forward in the BOMP, with cross-references to the relevant sections of the BOMP that detail those offset actions.

4.2 TABLE OF TWO-YEAR FORWARD WORK PLAN

TABLE 5 TWO-YEAR FORWARD WORK PLAN

BOMP Section	Offset Management Action	BOMP Year 5 (June 2026 - June 2027) ¹				BOMP Year 6 (June 2027 - June 2028) ¹			
		September Quarter 2026	December Quarter 2026	March Quarter 2027	June Quarter 2027	September Quarter 2027	December Quarter 2027	March Quarter 2028	June Quarter 2028
Weed Mapping									
5 & 6.4	Undertake island-wide weed mapping survey				Undertake island-wide weed mapping survey				
Plant Biosecurity Coordinator									
6.6.3	Employ Plant Biosecurity Coordinator	Plant Biosecurity Coordinator continued employment							
Weed Control and Monitoring									
6.7	Treat weeds, as per targets for each species. Weed monitoring.	Season reporting	Planning for next control season. Develop scope of works and contract agreements	First round of weed treatment and survey / monitoring	Second and third rounds of weed treatment and survey / monitoring	Season reporting	Planning for next control season. Develop scope of works and contract agreements	First round of weed treatment and survey / monitoring	Second and third rounds of weed treatment and survey / monitoring

¹ Quarter format is shown to align with Darwin CPI quarters.

BOMP Section	Offset Management Action	BOMP Year 5 (June 2026 - June 2027) ¹				BOMP Year 6 (June 2027 - June 2028) ¹			
		September Quarter 2026	December Quarter 2026	March Quarter 2027	June Quarter 2027	September Quarter 2027	December Quarter 2027	March Quarter 2028	June Quarter 2028
Quarantine System									
6.8.2	Quarantine inspections (freight, vehicles, etc)	Ongoing quarantine inspections (freight, vehicles, etc)							
Trigger Action Response Plan									
6.9	Implement TARP	TARP to be enacted as required.							
Community Awareness in Relation to Weeds									
6.10.3 & 6.10.4	Run awareness sessions and events	Awareness sessions and events to be continued to be delivered to community and key stakeholders in accordance with forward schedule.							
6.10.5	Create and distribute awareness materials	Create remainder of awareness materials. Distribute materials as part of awareness sessions. Continual improvement of material type and content to tailor to respective audiences / stakeholder groups.							
Training and Capacity Building									
6.11.2	Develop and implement training courses	Continue to deliver training courses. Continual improvement and refinement of training program. Expansion to community and relevant other land managers with weed management responsibilities on Groote Eylandt.							

BOMP Section	Offset Management Action	BOMP Year 5 (June 2026 - June 2027) ¹				BOMP Year 6 (June 2027 - June 2028) ¹			
		September Quarter 2026	December Quarter 2026	March Quarter 2027	June Quarter 2027	September Quarter 2027	December Quarter 2027	March Quarter 2028	June Quarter 2028
6.11.3	Develop and utilise training materials					Training materials developed and implemented. Continual improvement and refinement of training materials, particularly for Indigenous participants.			
Monitoring, Planning and Reporting									
7.3	Undertake annual planning	Annual planning meetings between ALC and GEMCO for 2 year forward work plan				Annual planning meetings between ALC and GEMCO for 2 year forward work plan			
7.4	Submit Impact Reconciliation Report							Third Impact Reconciliation Report for period 1 January 2026 to 31 December 2027 submitted.	

5 ADAPTIVE MANAGEMENT/ADJUSTMENTS TO THE OFFSETS PROGRAM

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

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

The management actions described in the BOMP are appropriate to achieve the required outcomes from the offsets program, and the resources required to achieve those outcomes remain commensurate with the total offset funds likely to be generated.

In the case of this Impact Reconciliation Report, the following adaptive management / adjustments to the offsets program are recommended from the completed reporting period:

- **Washdown Bay Construction.** Prevention is the most effective method of dealing with weeds, and little to no suitable facilities are available on Groote Eylandt for vehicle washdown to limit weed spread. Basic washdown (washbay) facilities would be particularly advantageous if installed in the following locations:
 - Port Freight facility at Alyangula.
 - ALC Ranger Base at Pole 13.
 - Angurugu.
 - Umbakumba.

The BOMP indicated that location and design of vehicle washdown facilities would be further evaluated for feasibility as additional actions to the program. It is proposed in FY27 to undertake design, costing and trial install of one such facility at the ALC Ranger Base, with a view to further install at the remaining locations should the facility prove successful and model sustainable in terms of usage and maintenance.

- **Expansion of Target Audience for Weed Control Training.** A weed management training program has been developed and implemented for ALC Rangers and staff. Current funding from NIAA received by the ALC Rangers has met, and continues to meet, all requirements for ALC training, As such, to further the goals of the BOMP for training and capacity building, it is proposed to expand training offerings to key external stakeholders with weed / land management responsibilities on Groote Eylandt. Improved awareness and targeted weed control activities by trained stakeholders in their own areas of managements will complement the control activities of the BOMP in the adjacent offset management area.
- **Suitable 4WD Light Vehicle.** The available hire vehicles have proven limited in their ruggedness for Groote Eylandt track conditions and in their ability to support the required weed spray units. A suitably configured dual-cab 4WD with required accessories will be purchased for the program in 2026.
- **Concurrent Weed Survey and Weed Treatment activities.** To-date, weed survey and weed treatment activities under the BOMP have occurred in separate campaigns. In the future, wherever practicable, it is proposed for weed survey (botanist) and weed control teams to operate concurrently. This will allow immediate treatment of identified weeds and knowledge sharing and upskilling of Rangers / weed control contractors. As weed surveys were initially proposed for two-year intervals, this would increase the frequency and therefore overall outlay for the surveys.

- **Expansion of Chemical Storage for Program.** The quarantine system audit identified that the current available chemical storage shed for herbicides for the program is too small to meet storage requirements. As such, a larger compliant chemical storage shed will be purchased and installed in 2026.
- **GIS specialist input.** No specialist GIS capability is available in the ALC Rangers, and GEMCO has limited in-house resources to meet all GIS support requirements across its operations. As such, GIS specialist input will be sought externally as needed to improve and expand the existing BOMP weed mapping platform, increasing useability and rigour in tracking weed records and treatment activities.

6 REFERENCES

Eastern Leases Biodiversity Offsets Management Plan (2024). Accessed at:

https://www.south32.net/docs/default-source/operations/gemco/eastern-leases-project-biodiversity-offsets-management-plan---approval-letter.pdf?sfvrsn=c0a7d5dc_3

GEMCO Eastern Leases Biodiversity Offset Strategy (2021). Accessed at:

[https://www.south32.net/docs/default-source/operations/gemco/eastern-leases/biodiversity-offsets/eastern-leases-biodiversity-offset-strategy-\(epbc2014_7228_june-2021\).pdf?sfvrsn=52bce3f7_1](https://www.south32.net/docs/default-source/operations/gemco/eastern-leases/biodiversity-offsets/eastern-leases-biodiversity-offset-strategy-(epbc2014_7228_june-2021).pdf?sfvrsn=52bce3f7_1)

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Eastern Leases Biodiversity Offsets Reconciliation Report (2024). Accessed at:

[https://www.south32.net/docs/default-source/operations/gemco/eastern-leases/biodiversity-offsets/bomp-reconciliation-report-\(epbc2014_7228-aug-2024\).pdf?sfvrsn=8f53cb9b_3](https://www.south32.net/docs/default-source/operations/gemco/eastern-leases/biodiversity-offsets/bomp-reconciliation-report-(epbc2014_7228-aug-2024).pdf?sfvrsn=8f53cb9b_3)

FIGURES



EASTERN LEASES PROJECT

Location Plan

FIGURE 1



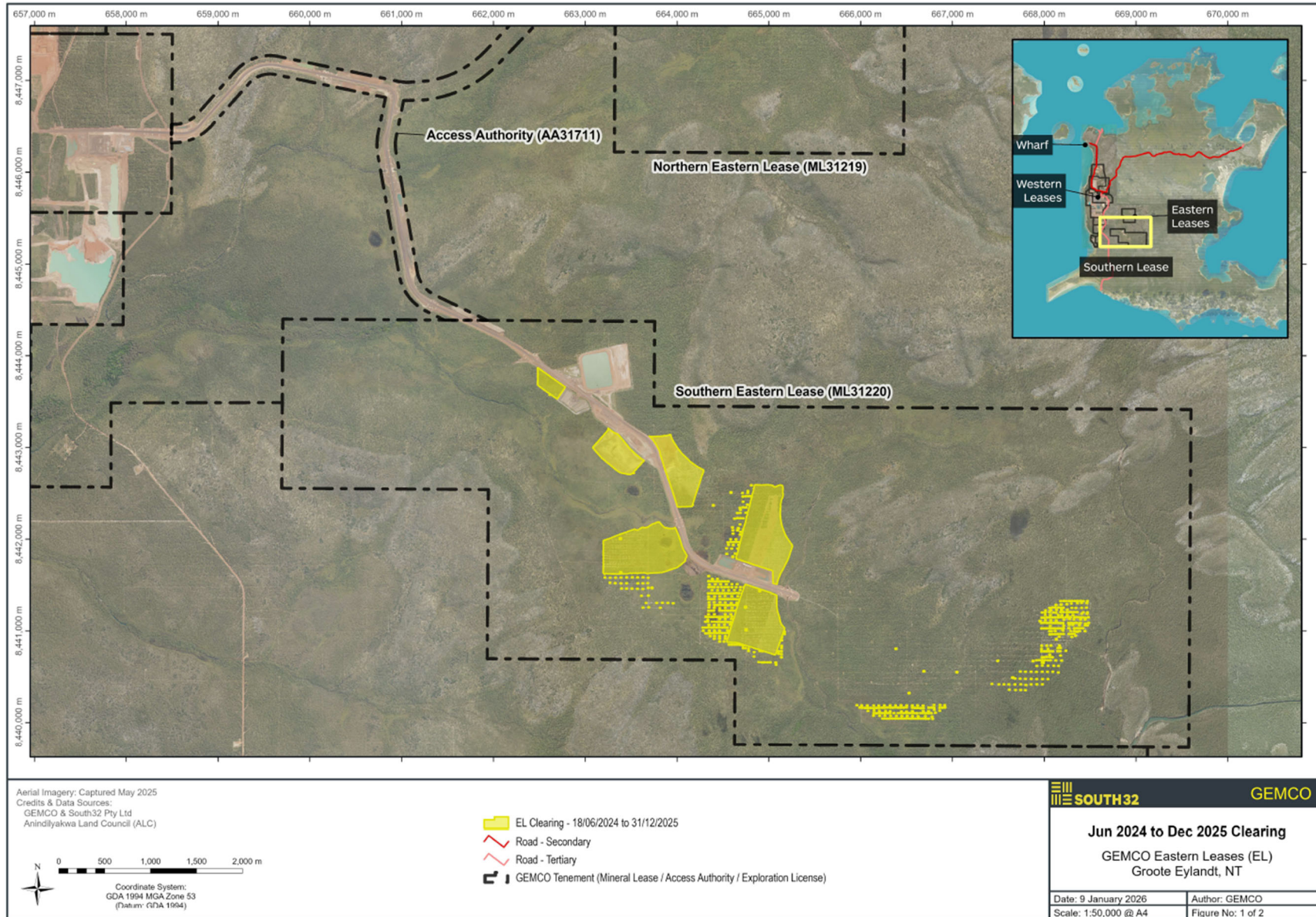


FIGURE 2 TOTAL AREA CLEARED IN THE EASTERN LEASES DURING THE REPORTING PERIOD (JUNE 2024 – DECEMBER 2025)

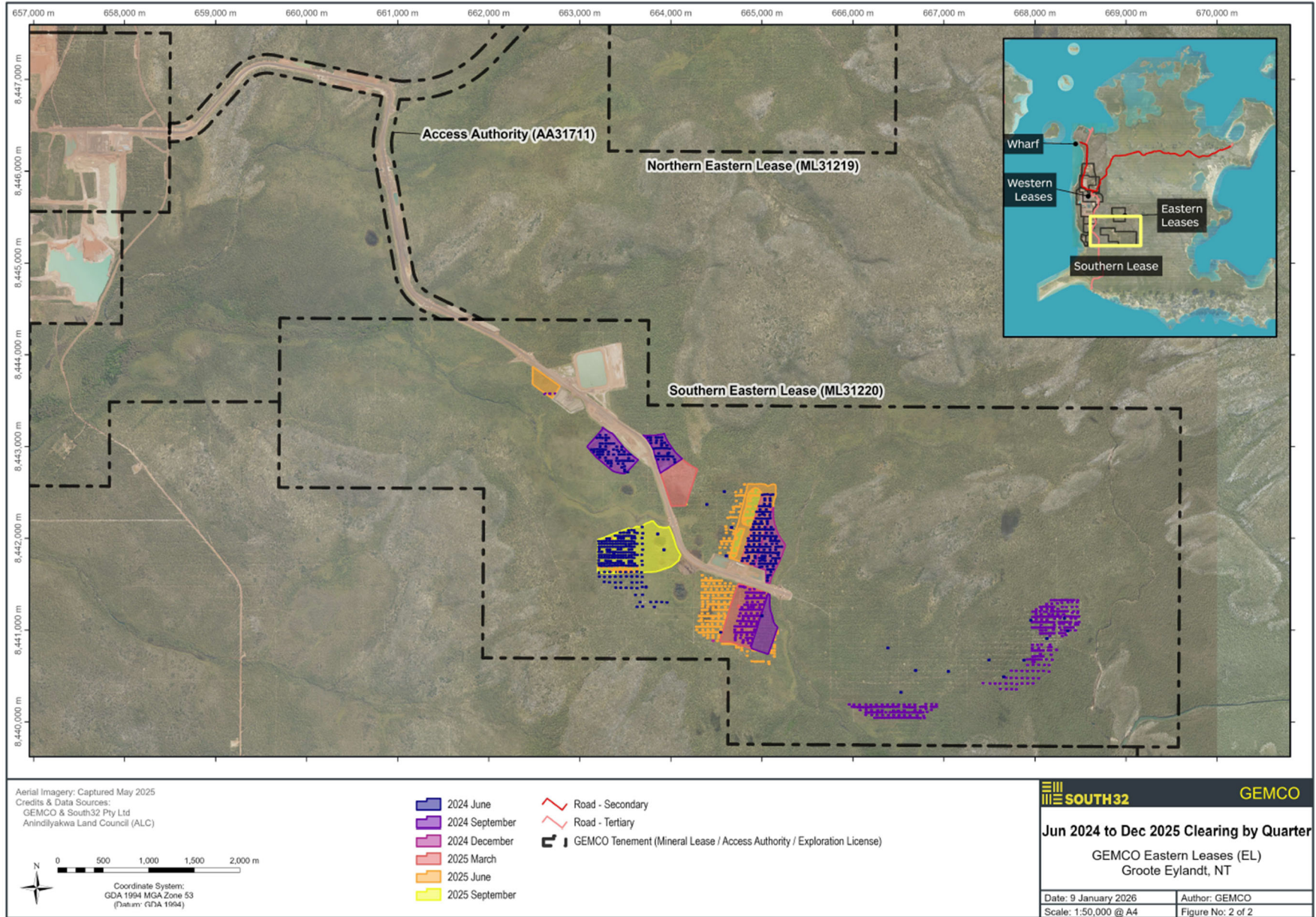


FIGURE 3 CLEARING IN THE EASTERN LEASES BY QUARTER DURING THE REPORTING PERIOD (JUNE 2024 – DECEMBER 2025)