



# EPBC Annual Compliance Report 2018/8340

Karreman Quarries

## West Mt Cotton Quarry Expansion

Prepared by:

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SLR Project No.: 625.010599.00001

14 October 2025

Revision: 1.0

## Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1.0	3 September 2025	Ben North	Megan Benham	Megan Benham
	<a href="#">Click to enter a date.</a>			

## Basis of Report

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

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

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



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## **Attachments**

**Attachment 1 – EPBC Determination**

**Attachment 2 – Commencement Letter**

**Attachment 3 – Preclearing letter (Powerline Diversion)**

**Attachment 4 – Preclearing letter (Pit Development)**

**Attachment 5 – Offset Site 1: Pineapple Farm**

**Attachment 6 – Offset Site 2: University Farm**

**Attachment 7 – Offset Site 3: Audale**

**Attachment 8 – Pineapple Farm Offset Reports**

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## 1.0 Introduction

Karreman Quarries Pty Ltd (ACN 10 168 742) are the approval holder for the West Mt Cotton Quarry Expansion at Redland City, Queensland (the 'proponent'). The Action is for the expansion and operation of the existing West Mount Cotton Quarry, and associated infrastructure which was decided on 3 March 2022 (reference: EPBC 2018/8340) (refer to **Attachment 1 – EPBC Determination**).

Condition 24 of the EPBC Act Approval requires an annual compliance report to be prepared and provides the necessary inclusions for the report. This will be the first compliance report for the Action.

The Action was commenced on **22 July 2024**, due to clearing being undertaken in preparation of the relocation of the Energex electricity infrastructure. Since commencing the action, a number of reports / management plans have been prepared for the offset sites for the Action.

- Fire Management Strategies
- Pest Animal Monitoring and Management Plans
- Rehabilitation Plans
- Weed Survey Reports

This audit has been provided as a desktop assessment, no attendance at the impact or offset sites has occurred to inform the audit review. Information reviewed has been sourced from internal documentation, or via the proponent. An assessment against the offset management plans has also not been undertaken at this time as it is acknowledged that the commencement of onsite activities has been delayed due to the engagement of a suitable ecological team by the proponent.

## 2.0 Project Area

The West Mount Cotton Quarry and the proposed extension are wholly located within the West Mount Cotton Key Resource Area – KRA 72 (refer to **Figure 1: Project Area**). The purpose of the Action is to facilitate an extension to the existing pit in order to maintain continuity of supply of aggregates and roadbase materials to meet future demand for construction materials across the Greater Brisbane region.

The proposed quarry extension is located within the resource/processing area boundary of KRA 72 within Lots 1 to 5 on RP 186598 (the 'site'). The quarry extension comprises approximately 60 ha and is expected to be developed over a period of approximately 30 – 50 years (market dependent).

**Table 1: Site Details**

Extension Site and Applicant Details	
<b>Real Property Description</b>	Lots 1 to 5 on RP 186598
<b>Registered Owners</b>	Karreman Quarries Pty Ltd
<b>Tenure</b>	Freehold
<b>Total Lot Area</b>	Lot 1 RP186598: 20.09 ha Lot 2 RP186598: 20.56 ha Lot 3 RP186598: 20.94 ha Lot 4 RP186598: 20.03 ha Lot 5 RP186598: 20.23 ha



<b>Total proposed extension</b>	60 ha
<b>Access</b>	West Mount Cotton Road
<b>Applicant</b>	Karreman Quarries Pty Ltd
<b>Local Government Area</b>	Redlands City Council
<b>Key Resource Area</b>	Mount Cotton Key Resource Area – KRA 72
<b>EPBC Reference</b>	2018/8340
<b>Assessment Manager</b>	Department of Climate Change, Energy, the Environment and Water (the 'department')
<b>Commencement of Use</b>	22 July 2024
<b>Annual Report Due Date</b>	14 October 2025



Figure 1: Project Area

### 3.0 Site Activities

The Action was commenced on 22 July 2024 (refer **Attachment 2 – Commencement Letter**) with initial clearing undertaken along the property boundary as part of the first phase of realigning the Energex powerline and an area directly adjacent to the existing quarry footprint. Subsequent clearing was carried out to enable access to the pit expansion area. Details of both clearing campaigns are provided in the sections below

- **Stage 1: Powerline Diversion** – Attexo was first engaged by Karreman Quarries on the 22 and 23 of July to conduct Animal Breeding Place Surveys on the site. On the 28 and 29 of July Fauna Spotter Catcher activities were undertaken to support the development of a new powerline easement (refer **Attachment 3 – Preclearing letter (Powerline Diversion)**). The areas cleared for this stage are illustrated in **Figure 2: Stage 1 Cleared Areas**.



- **Stage 2: Pit development** – The remaining 4.81 ha was cleared between the 18 and 21 of February 2025. Clearing activities took place immediately south-west of the existing Mt Cotton Quarry within land parcels 1RP186598, 2RP186598 and 3RP186598. The Project Area bordered an existing, cleared powerline easement and encompassed an existing driveway to an abandoned house on 2RP186598 (refer **Attachment 4 – Preclearing letter (Pit Development)**). The areas cleared for this stage are illustrated in **Figure 3: Stage 2 Cleared Areas**.

These works were undertaken under the supervision of a registered fauna spotter. No extraction has occurred in the extension area. Ongoing site management, including weed management and erosion and sediment control, will continue across the next 12 months. Works for the relocation of the powerline were undertaken between June and August 2025.

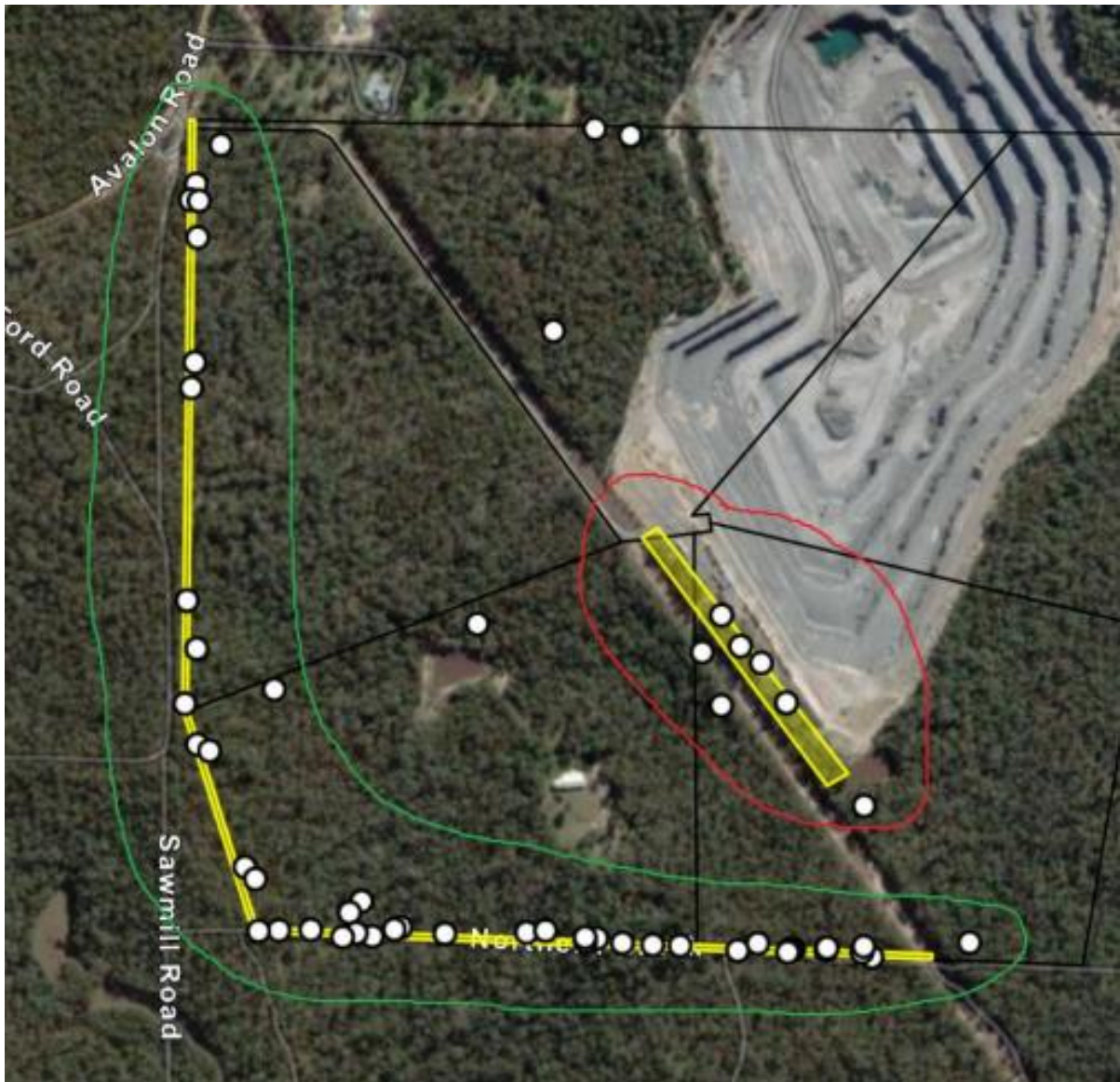


Figure 2: Stage 1 Cleared Areas





Figure 3: Stage 2 Cleared Areas

## 4.0 EPBC Approval Status

Over the course of the last 12 months, two (2) separate change applications have been submitted to the department. A summary of these applications is provided below.

### 4.1 Change 1 – Offset Configuration

A change to the EPBC Approval was submitted on the 18 of September 2024, which comprised a request to reconfigure Offset Site 3 (Audale) and introduced Offset Site 4 (Fulham Road). Ongoing discussions are occurring with the department on this item. It is anticipated that a revised application will be submitted to the department in October 2025.

The changes to the offset package will result in a significant increase to the total offset area, incorporating greater habitat diversity and an improved outcome for the relevant matters of national environmental significance ('MNES'). The proposed changes will also better align with offset requirements under State approvals.



The reconfigured Offset Site 3 will improve connectivity between the offset and the adjoining habitat system; it will better interface with existing infrastructure (fencing) and provides a more practical outcome for grazing operations being conducted on the balance of the property.

## 4.2 Change 2 – Legal Security of Offset Sites

Condition 15 of the EPBC Approval required all offset Sites to be legally secured within 12 months of commencement of the action. The action commenced on 22 July 2024, at which time two (2) offset locations were secured.

A request to change this condition, extending the timeframe by a further 12 months, was lodged on 12 March 2025. This application was intended to avoid non-compliance, given that a decision on the above-mentioned Change 1 (reconfiguration of Audale and addition of Offset Site 4) is yet to be decided.

## 5.0 Offset Sites

Condition 8 of the EPBC Approval states that the approval holder must ensure that each of the following increases to the habitat quality score at each offset Site has been achieved or exceeded within 20 years of the commencement of the action.

**Table 2: Habitat Quality Scores**

	Offset Site 1: Pineapple Farm	Offset Site 2: University Farm	Offset Site 3: Audale
<b>Koala Habitat</b>	2 habitat quality score unit increase	2 habitat quality score unit increase	1 habitat quality score unit increase
<b>Greater Glider Habitat</b>	1 habitat quality score unit increase	1 habitat quality score unit increase	1 habitat quality score unit increase
<b>Grey-Headed Flying Fox Habitat</b>	2 habitat quality score unit increase	3 habitat quality score unit increase	2 habitat quality score unit increase

### 5.1 Offset Site 1: Pineapple Farm

Offset Site 1, which is known as “Pineapple Farm” comprises land located approximately 1.2km to the north-west of the Action on 293 – 297 Avalon Road, Sheldon, Queensland as seen in **Figure 4: Offset areas 1 & 2 locations**. The Lot has a total area of approximately 53.64 ha, with 49.01 ha proposed as the Offset Site. Tree planting and establishment of juvenile trees at the Pineapple Farm over approximately 21 ha has occurred, and surveys have confirmed koala visitation and usage as koala habitat (refer to **Attachment 5 – Offset Site 1: Pineapple Farm**). Since commencement of use several reports have been produced to help facilitate the rehabilitation of the Site.

The site is legally secured under the *Vegetation Management Act 1999* as follows:

- Declaration over part of Lot 1 RP884860 (Redland City Council area) referred to as Pineapple Farm.
- Lodged 21 September 2023
- Decided on 17 May 2024
- Reference PMAV 2023/003125

Interim Performance Targets have been set by the government to ensure compliance with the requirements. These have been provided below:



**Table 3: Interim performance target(s) for Pineapple Farm**

Protected Matter	Habitat Quality Score			
	Year 0	Year 5	Year 10	Year 15
Koala	6.39	6.67	6.94	7.22
Grey Headed Flying Fox	6.16	6.53	6.90	7.27
Greater Glider	4.63	4.85	5.07	5.28

\*Note: This report provides the first annual report, and as such assessment against the Year 5 habitat score is not yet required.

## 5.2 Offset Site 2: University Farm

Offsite Site 2 which is known as 'University Farm' is located at 1050 Mount Cotton Road, Mount Cotton, Queensland (henceforth referred to as the 'Offset Site 2'). The Site is formally described as Lot 1 on RP98877, Lot 1 on RP50077, Lot 2 on RP169492, and Lot 261 on SP213421. Offset Site 2 is situated approximately 5km East of the operation (refer to **Figure 4: Offset areas 1 & 2 locations**). University Farm has a total area of approximately 51.52 ha, with 45.51 ha proposed as the Offset Site (refer to **Attachment 6 – Offset Site 2: University Farm**).

The site is legally secured under the *Vegetation Management Act 1999* as follows:

- Declaration over of lots 2 RP169492 & 1 RP50077 & 1 RP98877 & 261 SP213421 – (Redland City Council area) referred to as University Farm
- Lodged 21 September 2023
- Decided on 23 May 2024
- Reference PMAV 2023/003135

Interim Performance Targets have been set by the government to ensure compliance with the requirements. These have been provided below:

**Table 4: Interim performance target(s) for University Farm**

Protected Matter	Habitat Quality Score			
	Year 0	Year 5	Year 10	Year 15
Koala	4.67	5.24	5.81	6.38
Grey Headed Flying Fox	5.09	5.72	6.36	7.00
Greater Glider	5.09	5.72	6.36	7.00

\*Note: This report provides the first annual report, and as such assessment against the Year 5 habitat score is not yet required.



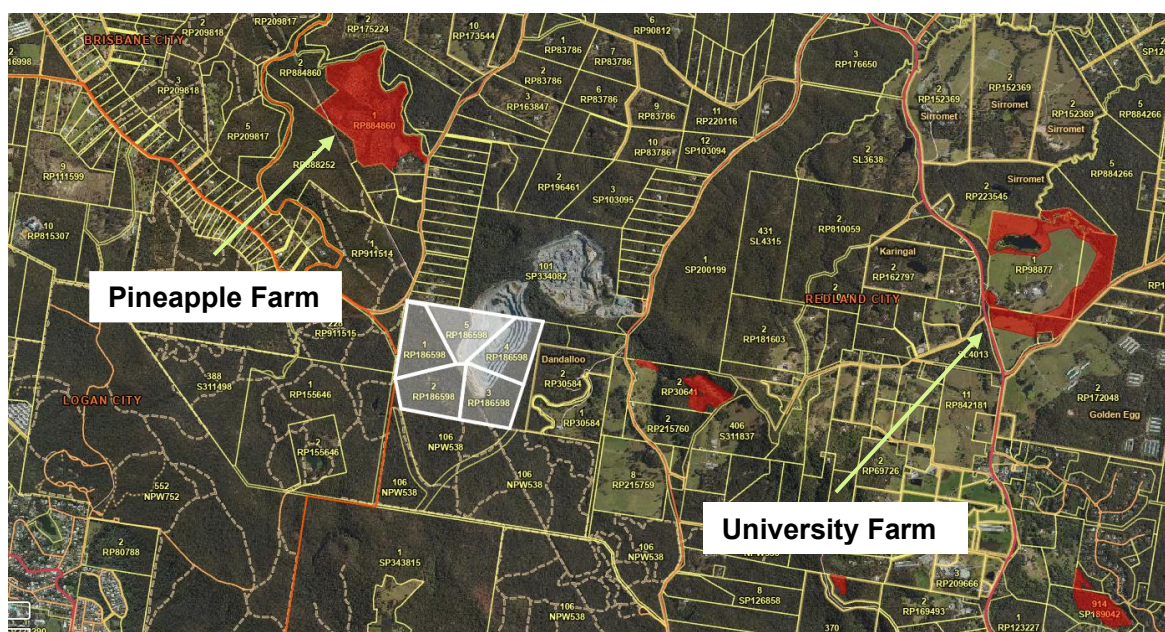


Figure 4: Offset areas 1 & 2 locations

### 5.3 Offset Site 3: Audale

Offset Site 3 referred to as Audale is located on Merlehan Road, Tarome which is 80 km southwest of the Action (refer to **Figure 5: Offset area 3 location**). The offset site is owned by the proponent and encompasses 205 ha and will be secured as a direct offset to acquit the Actions offset obligations (refer to **Attachment 7– Offset Site 3: Audale**).

Table 5: Interim performance target(s) for Audale

Protected Matter	Habitat Quality Score			
	Year 0	Year 5	Year 10	Year 15
Koala	5.50	5.86	6.22	6.59
Grey Headed Flying Fox	6.27	6.61	6.95	7.30
Greater Glider	3.62	4.09	4.56	5.03

\*Note: This report provides the first annual report, and as such assessment against the Year 5 habitat score is not yet required.



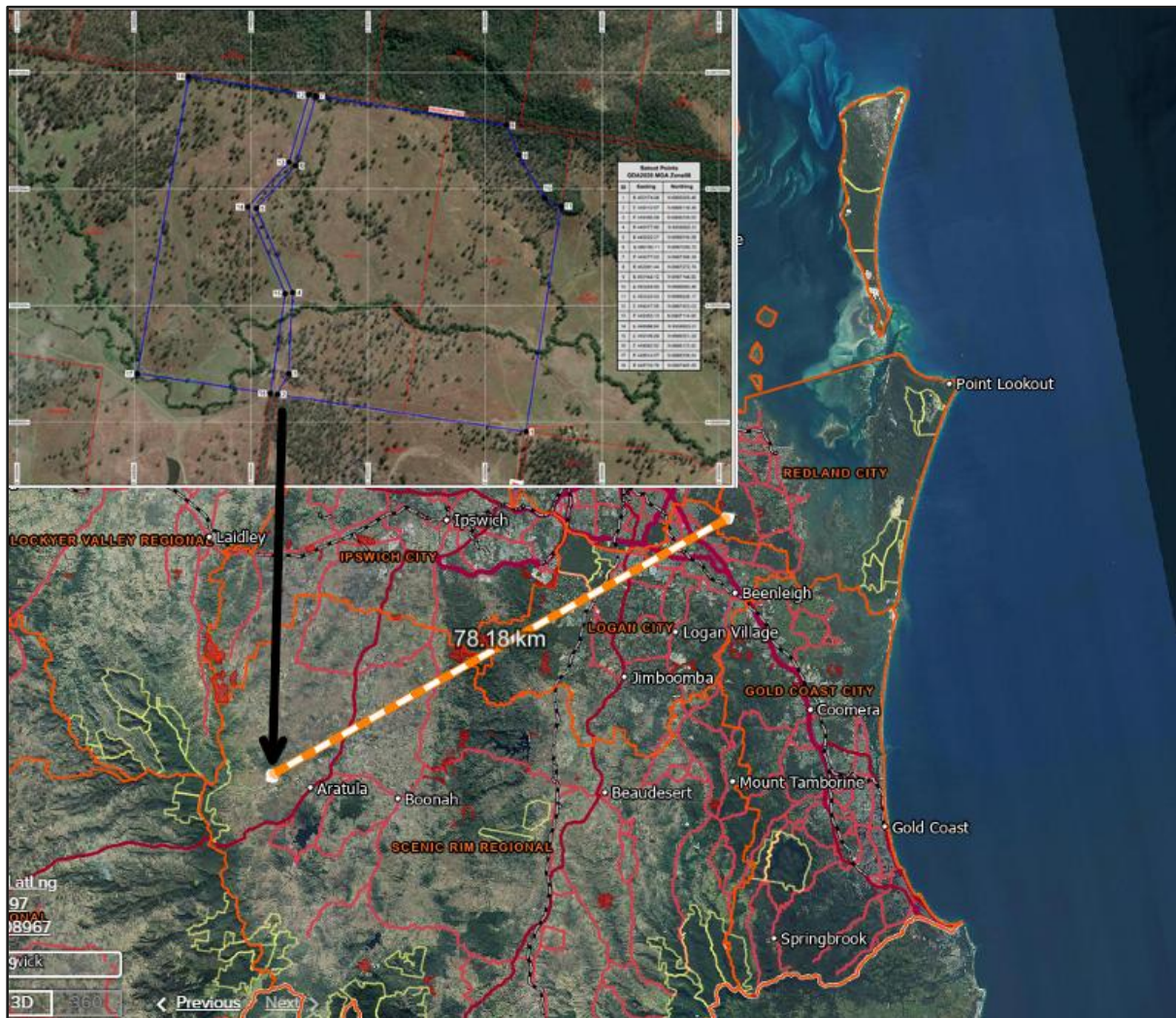


Figure 5: Offset area 3 location

## 5.4 Offset Implementation

### 5.4.1 Project Team

The following companies are engaged to ensure the offsets requirements are met:

- Biodiverse Environmental (The Trustee for Enviro Steward Trust) - Project management and implementation the delivery of the offsets.
- Gondwana Ecology (Justin Watson) – Ecological review, including annual reporting and monitoring.
- Karreman Quarries - Site preparation works and ongoing site management.
- SLR Consulting Australia Pty Ltd – Project management and client liaison.

The project team will be supplemented by sub-consultants as needed, for example weed management, seed collection, fencing contractors etc.

### 5.4.2 Offset Reports

Several plans and strategies have been produced including a Fire management strategy, Rehabilitation Plan, Pest Animal Monitoring and Management Plan, Weed Survey Report for



Offset sites 1 and 2 by Biodiverse. These plans are intended to be implemented in the coming spring. Research and due diligences have been finalised and are in place in anticipation of the remaining components.

Preparation of reports for Audale (Offset site 3) are yet to be undertaken. These will be progressed following confirmation from the department of the reconfiguration of the Audale offset. It is however anticipated that to meet the required habitat quality scores by Year 5, these reports will need to be commenced in anticipation of the department accepting the revised configuration of the offset.

Reports have been prepared for Offset site 4, as this site provides co-located offsets for matters of State environmental significance ('MSES').

A summary of the reports prepared for Offset sites 1 and 2 is provided below with the full documents compiled and attached as **Attachment 8 – Pineapple Farm Offset Reports** and **Attachment 9 – University Farm Offset Reports**.

### **Fire Management Strategies**

The Fire Management Strategy documents outline a coordinated approach to reducing bushfire risk and protecting ecological values within the offset sites. The strategy identifies management zones, fire suppression protocols, and track specifications to support safe access and effective fire control. It also considers threatened flora and fauna, vegetation communities, and biodiversity thresholds to balance environmental conservation with hazard reduction. Fire management blocks are prioritised based on overall risk, ranging from low to very high, ensuring targeted mitigation measures to safeguard assets, cultural heritage, and surrounding landscapes.

### **Pest Animal Monitoring and Management Plans**

The purpose of the Pest Animal Monitoring and Management Plans is to develop landscape-scale control program/management strategies for the control of pest animals and to provide a framework for implementing and coordinating the long-term monitoring and management of pest animals within the Offset Sites. The plans establishes a comprehensive framework to monitor, manage, and control invasive pest species, including wild dogs, feral cats, feral pigs, European foxes, and European rabbits. Developed in accordance with state and federal biosecurity legislation, the plans adopt an adaptive management approach using long-term monitoring, targeted control measures, and collaboration with relevant authorities over the 20-year maintenance period.

### **Rehabilitation Plans**

The Rehabilitation Plans outlines a strategic approach to restoring disturbed areas and enhancing environmental values across the sites. The plans detail staged rehabilitation activities, including soil stabilisation, re-vegetation using locally native species, and long-term monitoring to ensure ecological recovery. They focuses on protecting MSES vegetation by improving habitat quality and supporting biodiversity. The plans adopts adaptive management principles to address site-specific challenges and achieve sustainable rehabilitation outcomes ensuring compliance with state and federal environmental requirements.

### **Weed Survey Reports**

The Weed Survey Reports provide a detailed assessment of existing weed species, their distribution, and potential impacts on native vegetation and ecological values. The reports identify priority invasive species and classifies them based on their threat level to MSES and



MNES vegetation. They suggests targeted control measures within the broader Weed Management Plans to reduce competition with native flora, enhance habitat quality, and support long-term ecological restoration. The surveys serve as a baseline for ongoing monitoring and adaptive management across the.

## 6.0 Condition Review

This compliance report provides:

- A review of all conditions of the EPBC approval, noting if compliance or non-compliance with each condition has been achieved; and
- Identifies if a management plan is required under an approval condition and how these will be implemented.

The review adopts the following terms:

- **Compliant**

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

- **Non-compliant**

A designation of ‘non-compliant’ must be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.

- **Not applicable**

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

Findings of non-compliance are accompanied by a summary detailing any corrective measures taken.

As identified in **Table 6: Condition Review** non-compliances have been identified for 4 of the 31 conditions. These have been highlighted Grey for ease of reference. In short, the non-compliant conditioned are:

- **Condition 5:** Condition 5 requires the implementation of all three plans that comprise the Offset Area Management Plan. As previously discussed, an existing application has been made to alter Offset Site 3 (Audale) and include a new Offset Site 4 (Fulham Road). Further, the commencement of the action occurred in part due to the availability of Energex to relocate the powerline infrastructure on site. No extraction has occurred within the extension area to date.
- **Condition 15, 16, 17:** As previously discussed, an existing application has been made to alter Offset Site 3 (Audale) and include new Offset Site 4 (Fulham Road). An application has been made to alter this condition to ensure non-compliance is avoided. This application is yet to be decided.

To mitigate the non-compliances the proponent will endeavour to progress offset implementation as per the approved Offset Management Plans as a matter of priority. Should further non-compliances be identified prior to the next audit, the department will be notified.



**Table 6: Condition Review**

Condition	Project Compliance	Discussion
<b>Part A – Conditions specific to the action</b>		
<b>Maximum clearing limits</b>		
1. The approval holder must not clear outside the project area	Compliant	The clearing undertaken in the first 12 months is limited to that required to facilitate the commencement of the quarry activity, including the clearing for the re-alignment of the powerline and an initial works area.
2. The approval holder must not clear more than 5ha within the project area in any calendar year	Compliant	Refer response to condition 1.
3. The approval holder must not clear more than: a. 52.53ha of koala habitat b. 48.3ha of Greater Glider Habitat c. 48.3ha of Grey-headed flying fox foraging habitat.	Compliant	To date only 5ha of clearing has been undertaken by the proponent.
4. For the protection of koalas in the project area, the approval holder must:		
a. Ensure that a fauna spotter/catcher supervises all clearing activities and is given sufficient authority to ensure that such activities do not cause injury or death of Koalas.	Compliant	As discussed in Section 3.0, a fauna spotter was engaged to oversee the two (2) stages of clearing undertaken during the first 12 months of the activity.
b. Clear in accordance with all provisions for sequential clearing required under Part 3 of the current official version of the <i>Nature Conservation (Koala) Conservation Plan 2017</i> approved under the <i>Nature Conservation Act 1992 (QLD)</i> so as to ensure that Koalas safely move out of areas subject to clearing and into connected areas of Koala habitat.	Compliant	Refer response to 4(a) above.



Condition	Project Compliance	Discussion
<p>c. Install Koala exclusion fencing around all areas of construction work, immediately after clearing and prior to the commencement of construction, so as to prevent koalas entering all areas where construction is taking place. The Koala exclusion fencing around each construction area must remain in place until construction activities within the fenced construction area are completed.</p>	<p>Compliant</p>	<p>No fencing has been provided around the Stage 2 clearing area has been implemented at this time, as no disturbance of the natural surface is understood to have occurred.</p>
<p>d. Implement traffic calming measures and ensure that the speed of all vehicles on construction roads in the project area is no greater than 40km/hr at any time (except in an emergency) so as to minimize the risk to Koalas of vehicle strike.</p>	<p>Compliant</p>	<p>Internal vehicle movements on site are enforced at 40 km/hr under the Environmental management plan.</p>
<p><b>Environmental Offset Requirements</b></p>		
<p>5. To compensate for the clearance of habitat for protected matters up to the limits specified in Condition 3, the approval holder must, prior to the commencement of the action and for the duration of this approval, implement all three plans that comprise the Offset Area Management Plan.</p>	<p>Non-compliant</p>	<p>The proponent is progressing the implementation of the offset area management plans as attached to the current conditions of approval for Pineapple Farm and University Farm. In the last 12 months, this focused on the preparation of several plans and strategies including a Fire management strategy, Rehabilitation Plan, Pest Animal Monitoring and Management Plan, and Weed Survey Report for Offset sites by Biodiverse.</p> <p>It is acknowledged that a change application has been made, which seeks to alter the configuration of Audale and add a new site (Fulham Road). The ongoing discussions with the department on this request has delayed the commencement of offset actions at</p>



Condition	Project Compliance	Discussion
		<p>Audale. These reports will be progressed, and implemented over the next 12 months.</p> <p>In anticipation of Fulham Road being accepted, offset implementation reporting has been, as this site provides co-located offsets for matters of State environmental significance.</p> <p>It is noted that the offset strategy is not staged in a manner which anticipated the initial establishment phase of the activity, and this was in some ways dictated by the need to align with Energex availability to commence the powerline realignment works. This being said, the proponent is aware of the obligations and the limitations on the project specified in Condition 12, which would suspend the operation in the event that the 5 year interim performance targets are not met.</p>
<p>6. In addition to implementing the Offset Area Management Plans, the approval holder must ensure that, within 20 years of the commencement of the action, the following outcomes are achieved at each of the three places that comprise the offset sites:</p> <ul style="list-style-type: none"> <li>a. Average recruitment of woody perennial species in the ecologically dominant layer greater than 75%</li> <li>b. Average tree canopy cover greater than 50% (and less than 200%) of the benchmark for relevant Regional Ecosystems present</li> </ul>	<p>Not applicable</p>	<p>The project has not reached a time where it is reasonable to consider this condition.</p>



Condition	Project Compliance	Discussion
<ul style="list-style-type: none"> <li>c. Average tree canopy height greater than 70% of the benchmark for relevant Regional Ecosystems present</li> <li>d. Average number of large trees greater than 50% of the benchmark for relevant Regional Ecosystems present</li> <li>e. Average native tree species richness greater than 90% of the benchmark for relevant Regional Ecosystems present</li> <li>f. Average weed cover less than 4% of the benchmark for relevant Regional Ecosystems present</li> </ul>		
<p>7. In addition to implementing the Offset Area Management Plans, the approval holder must ensure that, once achieved, the outcomes specified in Condition 6 are maintained for the period of the effect of this approval at each of the three places that comprise the offset sites. If the approval holder can demonstrate that any commitment in the Offset Area Management Plans prevent the achievement or maintenance of the outcomes specified in Condition 6, then the approval holder must submit for approval a revised version of any such Offset Area Management Plans which enables the achievement or maintenance of the outcomes specified in Condition 6.</p>	Not applicable	The project has not reached a time where it is reasonable to consider this condition.
<p>8. In addition to implementing the Offset Area Management Plans, the approval holder must ensure that each of the following increases to the</p>	Not applicable	The project has not reached a time where it is reasonable to consider this condition.



Condition	Project Compliance	Discussion
<p>habitat quality score at each offset site has been achieved or exceeded within 20 years of the commencement of the action:</p> <ul style="list-style-type: none"> <li>a. Offset Site 1: Pineapple farm               <ul style="list-style-type: none"> <li>i. Koala habitat = 2 habitat quality score unit increase</li> <li>ii. Greater Glider habitat = 1 habitat quality score unit increase</li> <li>iii. Grey-headed Flying-fox foraging habitat = 2 habitat quality score unit increase</li> </ul> </li> <li>b. Offset Site 2: University farm               <ul style="list-style-type: none"> <li>i. Koala habitat = 2 habitat quality score unit increase</li> <li>ii. Greater Glider habitat = 1 habitat quality score unit increase</li> <li>iii. Grey-headed Flying-fox foraging habitat = 3 habitat quality score unit increase</li> </ul> </li> <li>c. Offset Site 3: Audale               <ul style="list-style-type: none"> <li>i. Koala habitat = 1 habitat quality score unit increase</li> <li>ii. Greater Glider habitat = 1 habitat quality score unit increase</li> <li>iii. Grey-headed Flying-fox foraging habitat = 2 habitat quality score unit increase</li> </ul> </li> </ul>		
<p>9. In addition to implementing the Offset Area Management Plans, the approval holder must ensure that, once achieved, each of the increases to the habitat quality score at all offset sites is maintained or exceeded over the period of effect of this approval. If the approval holder can</p>	<p>Not applicable</p>	<p>The project has not reached a time where it is reasonable to consider this condition.</p>



Condition	Project Compliance	Discussion
<p>demonstrate that any commitment in the Offset Area Management Plans prevents the achievement or maintenance of the increases to the habitat quality score specified in Condition 8, then the approval holder must submit for approval a revised version of any such Offset Area Management Plans which enables the achievement or maintenance of the increases to the habitat quality score specified in Condition 8.</p>		
<b>Offset Implementation and Reporting</b>		
<p>10. Within 60 business days after the end of each 5yr period from the commencement of the action, until the expiry of this approval, the approval holder must submit to the department and publish on the website for the remainder of the period of the approval a report specifying in detail progress (or lack thereof) towards achieving and/or maintaining each of the completion criteria. The report must:</p> <ul style="list-style-type: none"> <li>a. Report the outcomes achieved in respect to each interim performance target in the period since the commencement of the action.</li> <li>b. Report in detail the outcomes achieved in respect of each interim performance target in the last 5 years.</li> <li>c. Described the results and effectiveness of all management actions implemented during the last 5 years, including, but not limited to, progress made towards achieving the outcomes specified in Condition 7.</li> </ul>	<p>Not applicable</p>	<p>The project has not reached a time where it is reasonable to consider this condition.</p>



Condition	Project Compliance	Discussion
<p>d. Include all monitoring results, including all confirmed sightings, injuries and mortalities of protected matters in a format consistent with the Guidelines for biological survey and mapped date.</p> <p>e. Detail any interim performance targets not met, describe all corrective actions taken and evaluate their effectiveness</p> <p>f. Identify any further corrective actions and/or adaptive management actions required to meet interim performance targets and/or completion criteria.</p>		
<p>11. Within 60 business days after the end of 20 years from the commencement of the action, the approval holder must submit a report that documents whether or not the entirety of all offset sites have fully achieved and maintained all completion criteria.</p>	<p>Not applicable</p>	<p>The project has not reached a time where it is reasonable to consider this condition.</p>
<p>12. If any interim performance target has not been met in the previous 5-year reporting period, or if any of the completion criteria have not been met within 20 years of commencement of the action, clearing and operations must be suspended. If clearing and operations are suspended in this manner, clearing and operations must not resume until the Minister is satisfied with requirements and/or outcomes required under the conditions of approval, including (but not limited to) conditions 10 and 11.</p>	<p>Not applicable</p>	<p>The project has not reached a time where it is reasonable to consider this condition.</p>



Condition	Project Compliance	Discussion
13. If any completion criterion has not been achieved within 20 years from the commencement of the action, the approval holder must, within 6 months after the end of 20 years from the commencement of the action, submit to the Department for the Minister’s approval an Offset Management Plan for additional offsets to address the shortfall in environmental offsets.	Not applicable	The project has not reached a time where it is reasonable to consider this condition.
14. If an Offset Management Plan for additional offsets is required in accordance with condition 13 and an Offset Management Plan has not been approved by the Minister in writing within 10 months of the end of 20 years from the commencement of the action, operations must cease. In this event, the approval holder may only re-commence operations once an approved Offset Management Plan, or any subsequent version of the Offset Management Plan, is approved by the Minister in writing.	Not applicable	The project has not reached a time where it is reasonable to consider this condition.
<b>Legal Securing of Offsets</b>		
15. The approval holder must legally secure all offset sites within 12 months from the date of the commencement of the action. The associated Offset Area Management Plans must be attached to the legal mechanism used to legally secure the offset sites.	Non-compliant	Condition 15 of the EPBC Approval required all offset sites to be legally secured within 12 months of commencement of the action. The action commenced on 22 July 2024.  Under the <i>Vegetation Management Act 1999</i> the following has been secured: <ul style="list-style-type: none"> <li>- Declaration over part of Lot 1 RP884860 (Redland City Council area) referred to as Pineapple Farm.</li> </ul>



Condition	Project Compliance	Discussion
		<p>Lodged 21 September 2023, decided on 17 May 2024 (PMAV 2023/003125)</p> <ul style="list-style-type: none"> <li>- Declaration over part of Lot 2 RP169492 &amp; 1 RP50077 &amp; 1 RP98877 &amp; 261 SP213421 – (Redland City Council area) referred to as University Farm. Lodged 21 September 2023, decided on 23 May 2024 (PMAV 2023/003135)</li> </ul> <p>Legal security of the Audale site has not yet been progressed. This land, which is owned by the proponent, will be secured on confirmation of the revised configuration.</p> <p>A request to change this condition, extending the timeframe by a further 12 months, was lodged on 12 March 2025. This application was intended to avoid non-compliance, given that a decision on the above-mentioned Change 1 (reconfiguration of Audale and addition of Offset Site 4) is yet to be decided.</p>
<p>16. The approval holder must provide to the department evidence of the legal mechanism used to legally secure the offset sites within 5 business days of the legal mechanism being executed.</p>	<p>Non-compliant</p>	<p>It appears that notification to the department of compliance with this condition did not occur. As noted in the response to Condition 15, the department was notified within the change application on 12 March 2025 that two (2) approved offset sites have been legally secured via a Voluntary Declaration process under the <i>Vegetation Management Act 1999</i>.</p>
<p>17. The legal mechanism used to legally secure the offset sites must remain in force from the date of obtaining legal security for at least the remaining period of this approval.</p>	<p>Non-compliant</p>	<p>As discussed in response to Condition 15, the legal security for Audale is not yet held.</p>
<p><b>Part B – Standard administrative conditions</b></p>		



Condition	Project Compliance	Discussion
<b>Notification of date of commencement of the action</b>		
18. The approval holder must notify the department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Compliant	The activity commenced on 22 July 2024. Notification of commencement of the activity was provided to the department on 31 July 2024.
19. If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.	Compliant	The decision was given on 3 March 2022. The action commenced on 22 July 2024, within the 5 years outlined in Condition 19.
<b>Compliance records</b>		
20. The approval holder must maintain accurate and complete compliance records.	Complaint	The proponent has elected a project team to assist in managing accurate records on actions undertaken on the impact and offset sites.
21. If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.  Note: Compliance records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the department’s website or through the general media.	Not applicable	No request has been made by the department to date.
<b>Submission and publication of plans</b>		



Condition	Project Compliance	Discussion
22. The approval holder must: <ul style="list-style-type: none"> <li>a. submit plans electronically to the department</li> <li>b. publish each plan on the website within 20 business days of the date:               <ul style="list-style-type: none"> <li>i. of this approval, if the version of the plan to be implemented is specified in these conditions, or</li> <li>ii. the plan is approved by the Minister, if the plan requires the approval of the Minister.</li> </ul> </li> <li>c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public</li> <li>d. keep plans published on the website until the end date of this approval.</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>a) This compliance audit report will be submitted electronically as per the departments Guideline.</li> <li>b) The EPBC approval documents are available on the Karreman Quarries website for community review.</li> <li>c) The EPBC approval documents are available on the Karreman Quarries website for community review.</li> <li>d) The compliance audit report will be uploaded as per Condition 24.</li> </ul>
23. The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under conditions of this approval, is prepared in accordance with the department’s Guidelines for biological survey and mapped data (2018) and submitted electronically to the department in accordance with the requirements of those plans.	Not applicable	Compliance with Condition 23 will occur as the implementation of the offset management plans is rolled out. We expect subsequent reporting to be undertaken against this criteria.
<b>Annual compliance reporting</b>		
24. The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been	Compliant	This annual compliance report has been prepared in accordance with Condition 24. No information is considered to be sensitive ecological data as defined in the departments <i>Sensitive Ecological Data – Access and Management Policy V1.0</i> .



Condition	Project Compliance	Discussion
<p>agreed to in writing by the Minister. The approval holder must:</p> <ul style="list-style-type: none"> <li>a. publish each compliance report on the website within 60 business days following the relevant 12 month period</li> <li>b. notify the department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication</li> <li>c. keep all compliance reports publicly available on the website until this approval expires</li> <li>d. exclude or redact sensitive ecological data from compliance reports published on the website</li> <li>e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the department within 5 business days of publication.</li> </ul> <p>Note: Compliance reports may be published on the department's website.</p>		
<b>Reporting non-compliance</b>		
<p>25. The approval holder must notify the department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than 2 business days after becoming aware of the</p>	<p>Compliant</p>	<p>The project is non-compliant with Conditions relating to the legal security of all offset sites. This non-compliance was pre-empted with an application submitted to alter the condition prior to the 12 month period.          An administrative non-compliance appears to have occurred in relation to submitting evidence of securing</p>



Condition	Project Compliance	Discussion
<p>incident or non-compliance. The notification must specify:</p> <ul style="list-style-type: none"> <li>a. any condition which is or may be in breach</li> <li>b. a short description of the incident and/or non-compliance</li> <li>c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.</li> </ul>		<p>offset sites within 5 days of receiving this documentation. Again, the department was notified in March 2025 of the securing of two (2) of the offset sites under the <i>Vegetation Management Act 1999</i>. Further information regarding this can be provided if needed.</p>
<p>26. The approval holder must provide to the department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:</p> <ul style="list-style-type: none"> <li>a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future</li> <li>b. the potential impacts of the incident or non-compliance</li> <li>c. the method and timing of any remedial action that will be undertaken by the approval holder.</li> </ul>	<p>Not Applicable</p>	<p>Compliance with Condition 26 will occur as the implementation of the offset management plans is rolled out. We expect subsequent reporting to be undertaken against this criteria.</p>
<p><b>Independent audit</b></p>		
<p>27. The approval holder must ensure that independent audits of compliance with the conditions are conducted at least every 5 years and if requested in writing by the Minister.</p>	<p>Not applicable</p>	<p>The project has not reached a time where it is reasonable to consider this condition.</p>



Condition	Project Compliance	Discussion
28. For each independent audit, the approval holder must: <ul style="list-style-type: none"> <li>a. provide the name and qualifications of the independent auditor and the draft audit criteria to the department</li> <li>b. only commence the independent audit once the audit criteria have been approved in writing by the department</li> <li>c. submit an audit report to the department within the timeframe specified in the approved audit criteria.</li> </ul>	Not applicable	The project has not reached a time where it is reasonable to consider this condition.
29. The approval holder must publish the audit report on the website within 10 business days of receiving the department’s approval of the audit report and keep the audit report published on the website until the end date of this approval.	Not applicable	The project has not reached a time where it is reasonable to consider this condition.
<b>Revision of Management Plans</b>		
30. The approval holder may, at any time, apply to the Minister for a variation to a plan approved by the Minister by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised plan then, from the date specified, the approval holder must implement the revised plan in place of the previous plan.	Compliant	There is an existing application with the department to amend the offset management plans for Audale and include new offset management plans for Fulham Road. Once assessed and approved, these documents will form part of the implementation strategy.
<b>Completion of the action</b>		
31. Within 20 business days after the completion of the action, the approval holder must notify the department in writing and provide completion data.	Not applicable	The project has not reached a time where it is reasonable to consider this condition.



## 7.0 Closure

The purpose of this report is to demonstrate annual compliance with the requirements set out under Condition 24 of the EPBC Approval. This report provides an update on activities undertaken since the commencement of the action and outlines progress made towards achieving the approved environmental outcomes.

The approved action commenced on 22 July 2024, involving the relocation of an existing electricity infrastructure easement situated within the defined expansion area. Since the commencement of works, 5 hectares of vegetation have been cleared within the designated impact area. All clearing activities have been undertaken under the supervision of a qualified fauna spotter-catcher to ensure compliance with environmental obligations and to minimise impacts on protected species and habitat.

A dedicated project team has been engaged to oversee the implementation of the Offset Management Plans in accordance with the EPBC approval. These plans have been developed with the objective of meeting the Year 5 habitat quality targets and ensuring long-term environmental gains within the designated offset areas. Ongoing monitoring and adaptive management measures are being undertaken to ensure that offset objectives remain on track.

It is noted that there remains some uncertainty regarding the configuration of Offset Site 3 (Audale) and introduction of Offset Site 4 (Fulham Road). To ensure compliance timeframes are met and potential delays are minimised, it is recommended that the proponent proactively implements the revised configuration as soon as practicable, subject to final approval.

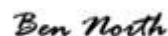
The legal security of Offset Site 3 (Audale) will be submitted under the *Vegetation Management Act 1999* within two months following approval of the reconfigured offset site. This will ensure that offset obligations under the EPBC approval are legally binding and provide long-term protection for the designated habitat areas.

Sincerely,

**SLR Consulting Australia Pty Ltd**



**Megan Benham**  
Principle Consultant – Planning



**Ben North**  
Project Consultant – Planning



**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 Quinton A Leed

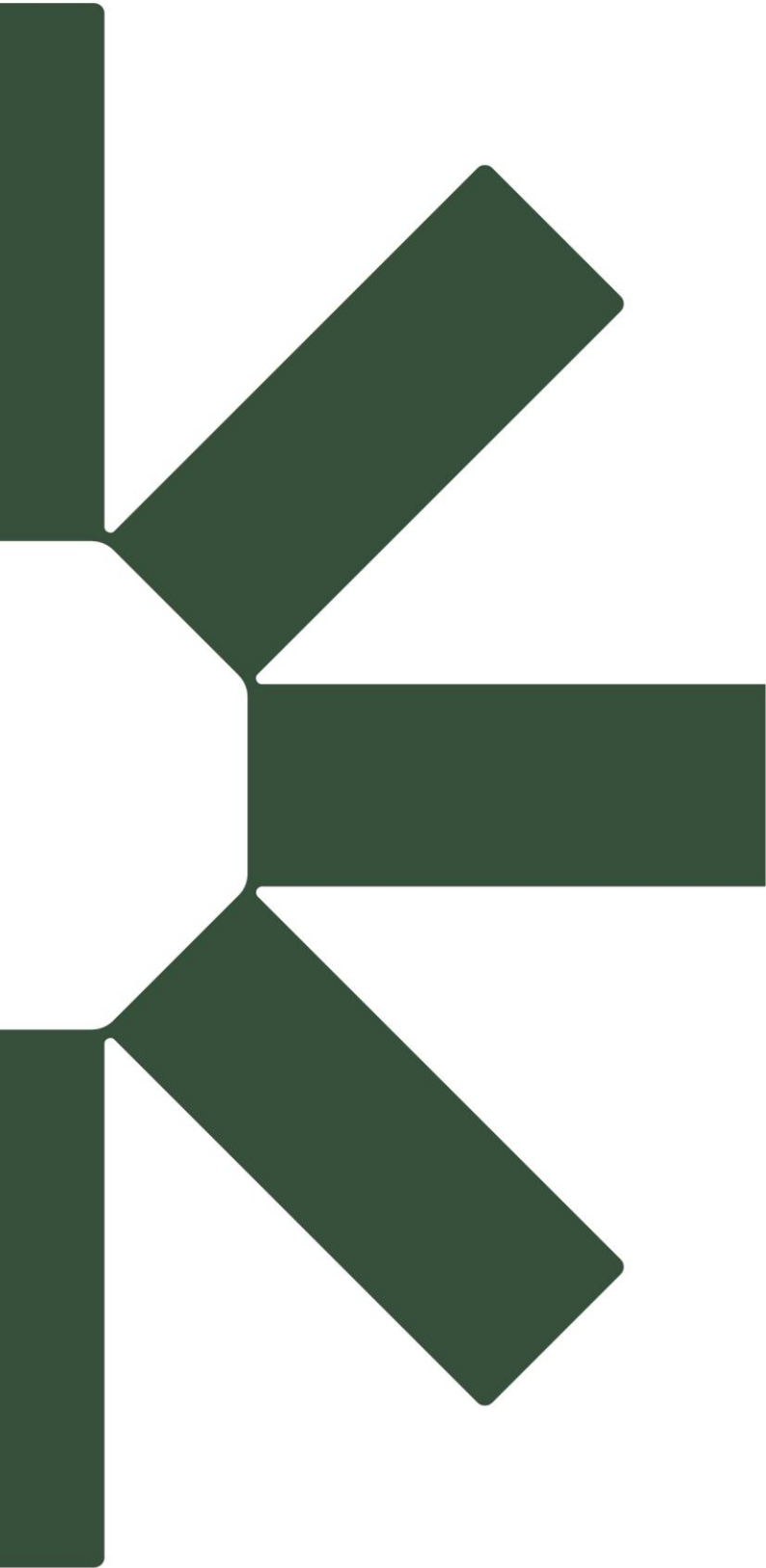
Full name (please print) Quinton Alan Leed

Position (please print) Operations Manager

Organisation (please print including ABN/ACN if applicable) Karreman Quarries 60010168742

Date 14 / 10 / 2025





Making Sustainability Happen