

To: [REDACTED]

From: [REDACTED]

Company: AngloAmerican

SLR Consulting Australia Pty Ltd

cc:

Date: 23 December 2025

Project No. 623.030647.00001

**RE: Offset Area Review
Moranbah North Mine Extension**

Confidentiality

This document is confidential and may contain legally privileged information. If you are not a named or authorised recipient, you must not read, copy, distribute or act in reliance on it. If you have received this document in error, please notify us immediately and delete or destroy the document.

1.0 Introduction

SLR Consulting Australia Pty Ltd (SLR) were commissioned by AngloAmerican to peer review the Annual Offset Area Management Report and Initial Offset Area Condition Report for Moranbah North Mine Expansion. Tracked changes have been applied to each word document. A summary of the review has been provided below.

2.0 Initial Offset Area Condition Report

The Initial Offset Area Condition Report was prepared on the 30 June 2025. This document was reviewed by [REDACTED] an Associate Ecologist with over 17 years' experience on 4th December 2025. Table 1 details SLR's recommendations which could be implemented in subsequent iterations.

Table 1: SLR Comments and Recommendations

Section/Page	Report Text	SLR Comment/Recommendation
Section 1	General comment	SLR notes this report only outlines the finding of surveys conducted on [REDACTED]. SLR also notes that AngloAmerican are in consultation with the Commonwealth about swapping [REDACTED] for [REDACTED]. Therefore, SLR have assumed that there has been no monitoring occurrence for ornamental snake since the Action commenced.
Section 1	General comment	Within the introduction section, it is advised that a copy of the monitoring schedule is provided, with further discussion on how the report aligns to this schedule.
Section 1	General comment	Given the lack of monitoring on [REDACTED] for ornamental snake, it is suggested that a new monitoring program is designed to ensure monitoring is conducted in accordance with the conditions of the EPBC approval. Otherwise, the OAMP variation should account for this.
Section 2	<i>"An assessment to determine baseline values for the [REDACTED] property offset area was completed by E2M and published in</i>	This statement is slightly confusing - earlier in the document it reads <i>"The reporting period is from approval of the OAMP on 6 August 2024 to 30 May 2025"</i> , within this Section, the author states that field surveys were conducted in Dec 2021 and it's

Section/Page	Report Text	SLR Comment/Recommendation
	<i>December 2021. This assessment forms the basis of this Initial Offset Area Condition Report."</i>	<p>this 2021 assessment which forms the basis for this report.</p> <p>SLR has assumed this statement means a survey conducted in 2021 has formed the baseline values and subsequent monitoring (i.e., the monitoring which has informed this report) has been directly compared to this 2021 baseline. However, there is no comparison throughout the document on how the values in 2024/2025 compared to those baseline values in 2021.</p> <p>How does the reader know if there have been improved/declined habitat values? SLR suggest comparisons are applied throughout this report.</p>
Section 2	General comment	<p>The <i>Terrestrial Vertebrate Fauna Survey Guidelines for Queensland</i> (Eyre et al 2022) suggest using spot-assessment techniques for koalas however, there is no mention of this survey effort in the report. We would suggest listing the guidance document which have been used for the survey, and a short explanation as to why some more recent survey techniques have not been applied.</p>
Section 2.5	<i>"The survey period was considered outside of the ornamental snake survey season and therefore the species was not targeted."</i>	<p>In the 'Introduction' section there is text relating to how [REDACTED], which was to be the offset site for Ornamental Snake, was not considered in this report, and that [REDACTED] is only to support Koala, Glider and Squatter Pigeon.</p> <p>This limitation is confusing. It implies that [REDACTED] was surveyed for a species which is not the purpose of the offset site.</p>
	<i>"Habitat suitability assessments for the species were conducted as a proxy for targeted surveys."</i>	<p>It is unclear as to why a habitat assessment would be used as a proxy for a species which is not the purpose of the offset site.</p>
Section 3	<i>"Evidence of koala (Photo1) was observed at numerous locations along riparian corridors within the offset area although no individuals were directly observed during the field survey".</i>	<p>SLR are not convinced that these scratch marks, and only these scratch marks can be considered "evidence of koala"?</p> <p>We recommend that the presence of koala is supported by secondary evidence (i.e., scats or visual observation) before declaring absolute presence.</p>
Section 3.1.2	<i>"...a strong correlation exists between the number of large hollows abundance and the number of greater gliders (Andrews et al., 1994)."</i>	<p>Whilst this does still hold some relevance, recent documentation also suggests the use of a tree's Diameter at Breast Height as detailed in <i>Guide to greater glider habitat in Queensland</i> (DES 2022)</p>
Section 3.1.3	General comment	<p>It would be worth considering proximity to a water source and the use of non-remnant habitats when considering habitat suitability for the species.</p>



Section/Page	Report Text	SLR Comment/Recommendation
Section 3.1.4	General comment	If the [REDACTED] offset property is not for Ornamental Snake, and this report only considers [REDACTED], this section appears to be redundant.
Section 4.1	<i>"All offset areas scored highly due to the largely intact nature of the surrounding landscape."</i>	In Section 3.2.3 it states " <i>The offset area is located within fragmented landscape</i> ". This statement appears to be contradictory.
Section 5	<i>"In summary, the [REDACTED] offset area is suitable to support koala, greater glider and squatter pigeon habitat"</i>	SLR are confused by this statement, and it might be due to the limited information in the introduction section. SLR assumed the [REDACTED] offset property was to deliver offsets for koala, greater glider and squatter pigeon. Therefore, it was assumed that this report was part of an ongoing monitoring program to ensure the quality/condition of the offset site was improving in accordance with the Offset Area Management Plan (OAMP). Given [REDACTED] was an agreed offset property, it was (or should have been) already known that the offset site is suitable to support koala, greater glider and squatter pigeon, this fact was never in doubt. Therefore, this statement seems redundant. What the conclusions hasn't informed the reader is how the offset site is improving in accordance with the OAMP, and any comparisons against the 2021 baseline value (as per our previous comment).

3.0 Annual Offset Area Management Report

The Annual Offset Area Management Report was prepared on the 30 June 2025. This document was reviewed by [REDACTED], an Associate Ecologist with over 17 years' experience on 5th December 2025. Table 2 details SLR's recommendations which could be implemented in subsequent iterations.

Table 2 SLR Comments and Recommendations

Section/Page	Report Text	SLR Comment/Recommendations
Section 1	General comment	SLR notes this report only outlines the finding of surveys conducted on [REDACTED]. SLR also notes that AngloAmerican are in consultation with the Commonwealth about swapping [REDACTED] for [REDACTED]. Therefore, SLR have assumed that there has been no monitoring occurrence for Ornamental Snake since the Action commenced.
Section 1	General comment	It would be advantageous to inform the reader as to when the [REDACTED] offset site was first commenced as an active offset site, and what the full monitoring schedule is.
Page 8	<i>"An offer for the voluntary declaration has been received and discussion with the Department</i>	This suggests the [REDACTED] offset property is still not a legal secured offset. Can any monitoring which has been conducted (and reported on), prior to the OAMP variation being approved and the site becoming



Section/Page	Report Text	SLR Comment/Recommendations
	<i>regarding the terms of the offer are ongoing. The applications are yet to be decided”.</i>	legally secured, count towards the monitoring schedule? SLR suggests a conversation with the regulator is held to confirm AngloAmerican's position. Without agreement from the regulator, it must be assumed that monitoring and management in accordance with compliance criteria, can only commence once the property is legally secured, and the OAMP is formally approved.
Page 8	<i>“Quarterly inspections will monitor and document if there is evidence of recent forestry or timber harvesting activities”.</i>	The table concludes by saying <i>“No unapproved and/or intentional clearing of vegetation within the offset area has been detected”</i> . SLR suggests documenting the dates of when the quarterly inspections were conducted, and by whom. In doing so, it will be clear as to when vegetation loss has occurred from documented audit logs.
Page 9	<i>“Degradation of habitat by overgrazing” row</i>	There is a lack of comment within the 'Reporting Period' column. Evidence is needed to confirm when stock was allowed to graze, and whether cattle were removed during the wet season. Given the site is not legally secure, SLR have assumed this is left blank as grazing cannot be controlled at the time of writing.
Page 9	<i>“Introduction, establishment and spread of non-native weeds including restricted invasive plants listed under the Biosecurity Act 2014 (Qld)” row</i>	Parkinsonia is known within the riparian areas. How has this been treated? No data has been presented to indicate how the site has changed since the initial survey. The reviewer cannot judge if any new weeds have been introduced. SLR recommends that data is provided from the quarterly inspections. SLR also recommends that a criteria (i.e., timeframe, measure of eradication) is provided on how Mealy bugs will serve to eradicate Harissia cactus. This will ensure that there are measurable attributes on the biological control effectiveness.
Page 9	<i>“Pest animal monitoring sites will be established as part of the year 1 survey”</i>	There is no evidence that pest monitoring has been conducted to establish a baseline.
Page 10	<i>“Fire” – row.</i> <i>“Quarterly inspections will monitor and document if there is evidence of wildfire,”</i>	The table details that an inspection was undertaken on 19 June 2025 however, there is no further information what dates the quarterly inspections were conducted, and by whom. SLR recommends the provision of an inspection log. This can be included as an appendix to this report.



In [REDACTED] absence, this technical memorandum has been compiled by [REDACTED]
[REDACTED] using comments provided in the Microsoft Word documents.

Regards,

SLR Consulting Australia Pty Ltd

