

Attachment B: Statement of Compliance Against Dredge Environmental Management Plan Commitments – 6 October 2024 to 5 October 2025

SECTION IN DEMP	COMMITMENT IN DEMP	COMMENT	COMPLIANT
1.3.3.2	Pilbara Ports and the dredging contractor(s) undertaking the dredging program, shall have a Quality System certified by a third party to be compliant with ISO 9001, or equivalent. Quality records shall be kept for dredging and surveys, data management presentation and interpretation.	Both Pilbara Ports and Boskalis are certified to ISO 9001 standards. Records are contained within Pilbara Ports and Project document management systems. Boskalis accreditation Pilbara Ports Quality Policy	Compliant
Table 8	Implement the Dredge Plume Validation Program. <ul style="list-style-type: none"> Validate the extent of the Project's predicted dredge plume as inferred from hydrodynamic modelling results Monitor the intensity of the actual 'ecological pressure' caused by the backactor dredging-related activities to compare with the predicted impacts on BCH Advance the parameterisation of dredge plume modelling inputs of backactor dredging-related activities to improve predictive dredge plume modelling studies Advance the parameterisation of benthic light attenuation due to suspended solid concentrations in the Pilbara to improve predictive dredge plume modelling studies. 	Pilbara Ports contracted O2 Marine to implement the Dredge Plume Validation Program. The program was completed successfully. The findings of this study enhance the reliability of far-field sediment plume modelling by targeting improvements in numerical modelling set up, ultimately resulting in greater confidence in regulatory compliance and the effectiveness of environmental monitoring and management programs. Refer to Attachment I – Final Dredge Plume Validation Report. Pilbara Ports reference: A1924959	Compliant
Table 8	Dredge hopper doors and seals to be inspected and maintained to prevent loss of dredge spoil during transport.	The Contractor Dredging and Spoil Disposal Management Plan includes provision to use a high-resolution positioning system to control dredge and	Compliant

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		<p>disposal operations. This includes the position, as determined by Global Positioning System (GPS), of the dumping vessel at the commencement of dumping (i.e. hopper doors opened) and at the completion of dumping (i.e. hopper doors closed), including the path / track taken during dumping. A post dredging bathymetry survey confirmed no loss of product.</p> <p>Contractors Dredging and Spoil Disposal Management Plan, Pilbara Ports reference: A1534128</p> <p>Logfiles contain door open and close times. Pilbara Ports reference: qA56870</p> <p>A bathymetric survey was completed 13 October 2024, which was prior to dumping activities. On completion of dredging, another bathymetric survey was undertaken on 15 May 2025. The 'change analysis' confirms no loss of product outside of approved areas. Pilbara Ports reference: A1738394</p>	
Table 8	Dredge spoil to only be dumped within the area allocated by Pilbara Ports, inside the designated spoil grounds listed within the Sea Dumping Permit.	<p>All material was dumped within approved spoil ground (East Lewis Island) – Pilbara Ports reference: fA139087</p> <p>Screenshots of dumping runs graphically demonstrate location of individual spoil disposals. Vessel Logfiles includes vessel location, draft, open / closed status. This is updated several times per minute. Dump Screenshots contained at Pilbara Ports reference: fA139087</p> <p>Logfiles contained at Pilbara Ports reference: qA56870</p>	Compliant

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		A bathymetric survey was completed 13 October 2024, which was prior to dumping activities. On completion of dredging, another bathymetric survey was undertaken on 15 May 2025. The 'change analysis' confirms no loss of product outside of approved areas. Pilbara Ports reference: A1738394	
Table 8	Dredge spoil shall be dumped in a manner such that it minimises mounding and optimises spoil ground utilisation for the proposed, and future, maintenance dredging program(s).	<p>As per the Contractor's Dredging and Spoil Disposal Management plan, materials were placed into the spoil ground using a predetermined pattern for dumping to maximise the available capacity of the spoil ground and to ensure safe navigation. Pre-defined 'dump-boxes' were established in the navigation software and used in a predetermined sequence minimising potential mounding from dumping activities.</p> <p>Graphic representation of Dump Boxes available at Pilbara Ports reference: A1738429</p> <p>Contractors Dredging and Spoil Disposal Management Plan, Pilbara Ports reference: A1534128</p>	Compliant
Table 8	Dredge hoppers to only be washed within boundaries of the designated spoil grounds.	<p>As per the Dredging Environmental Management Plan, washing down of the barge was undertaken only within the boundaries of the dredging area or within the boundaries of the offshore spoil grounds. Pilbara Ports reference: A1533502</p> <p>Hoppers require door opening to facilitate washing. Door status is captured in Vessel Logfiles.</p> <p>Logfiles contained at Pilbara Ports reference: qA56870</p>	Compliant

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Table 8	Employ high-resolution positioning system to control dredge and disposal options	<p>GPS was used to track location of each vessel. For the Baldur, individual spud positions and the position of the Baldur's bucket while dredging were recorded.</p> <p>Contractors Dredging and Spoil Disposal Management Plan, Pilbara Ports reference: A1534128</p> <p>Logfiles contain door open and close times. Pilbara Ports reference: qA56870</p> <p>A bathymetric survey was completed 13 October 2024, which was prior to dumping activities. On completion of dredging, another bathymetric survey was undertaken on 15 May 2025. The 'change analysis' confirms no loss of product outside of approved areas. Pilbara Ports reference: A1738394</p> <p>An audit of the dredging contractor was conducted on 12 December 2024 and 27 February 2025. All conditions of the Sea Dumping Permit (SDP) and commitments within the Dredge Environmental Management Plan were complied with. Pilbara Ports reference qA56866</p> <p>Logfiles contained in Objective Folder Pilbara Ports reference: qA56870</p>	Compliant
Table 8	Undertake bathymetric survey of the disposal site (by a suitably qualified person).	<p>Pre and post dredging bathymetric surveys were conducted of the East Lewis Island Spoil Ground.</p> <p>A bathymetric survey was completed 13 October 2024, which was prior to dumping activities. On completion of dredging, another bathymetric survey was undertaken on 15 May 2025. The survey was completed by a Level 1 certified Hydrographic</p>	

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		<p>surveyor from the Dredging Contractor. The 'change analysis' confirms no loss of product outside of approved areas. Pilbara Ports reference: A1738394</p> <p>Final Bathymetry Report. Pilbara Ports reference: A1716576.</p>	
Table 9	<p>Internal training of Marine Fauna Observer(s) (MFO), which provides clear direction on:</p> <ul style="list-style-type: none"> • The area that comprises the 'monitoring zone'3, being the area within a 300 metre radius of the dredge vessel • How to identify marine megafauna (i.e. whales, dolphins, dugong, turtles) that are known or likely to be encountered within the Port • The actions to be undertaken by the MFO in the event of marine fauna being sighted within the monitoring zone • The actions to be undertaken by the MFO in the event of an incident resulting in injury or death of a marine species. 	<p>The Contractor assigned suitably trained MFO to monitor for marine fauna during dredging and blasting activities.</p> <p>The Contractor maintains a MFO Training register which details personnel trained. The Contractor has also provided detail on the training content. Pilbara Ports reference: fA162053</p> <p>The Contractor has provided MFO Logs to Pilbara Ports. The logs contain all marine fauna observations within the monitoring zone during dredging and dumping activities: fA161016</p>	Compliant
Table 9	Minimise impacts of the dredge through underwater noise through proper maintenance of equipment.	<p>The Dredging Environmental Management Plan includes provision for routine maintenance to reduce noise impacts. Pilbara Ports reference: A1533502</p> <p>Servicing of all equipment is scheduled at appropriate intervals and conducted by either the (Dredging Contractor's) vessel Chief Engineer or Superintendent. Work is conducted according to service manuals and Safe Work Method Statement (SWMS).</p> <p>Pilbara Ports conducted an audit of the dredging contractor on 12 December 2024 and 27 February</p>	Compliant

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		2025. Photo evidence was collected to demonstrate compliance with approved plans and SDP. Pilbara Ports reference: qA41492 (folders 7c and 7d)	
Table 9	Minimise impacts of light on fauna through the minimisation of unnecessary light sources not required for safe operation of the dredge.	Light mitigation measures are provided in the Contractor Dredging Environmental Management Plan and include downward orientation of lights and avoidance of light spill towards sensitive shore-based habitat. Pilbara Ports reference: A1533502	Compliant
Table 9	Prior to the commencement of the dredging and dumping activities, the dredging contractor must ensure that a check is undertaken, using binoculars from a high observation platform, for marine megafauna within the 'monitoring zone'. If any marine megafauna are sighted in the 'monitoring zone', dredging and dumping activities must not commence until the marine megafauna is no longer observed in the monitoring zone, or the vessel is to move to another area of the dredging/disposal site to maintain a minimum distance of 300 metres between the vessel and any marine species.	MFOs conducted operations in compliance with commitments within the Contractor Dredging Environmental Management Plan (Pilbara Ports reference: A1533502) and Dredging and Spoil Disposal Management Plan. Pilbara Ports reference: A1534128 The Contractor has provided MFO Logs to Pilbara Ports. The logs contain all marine fauna observations within the monitoring zone during dredging and dumping activities. Pilbara Ports reference: fA161016	Compliant
Table 9	Ongoing internal training of MFOs as required to ensure that a trained MFO is always available.	The Contractor assigned suitably trained MFO to monitor for marine fauna during dredging and blasting activities. The Contractor maintains a MFO Training register which details personnel trained. The Contractor has also provided detail on the training content. Pilbara Ports reference: fA162053 Dredging Contractor's list of trained MFOs is available at Pilbara Ports reference: A1845850	Compliant

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Table 9	A log detailing all marine fauna observations within the monitoring zone (during daylight operations only) shall be maintained. The log shall include (as a minimum) the following information: date, name of MFO, time (commencement of pre-dumping observations), time (completion of pre-dumping observations), whether marine megafauna was sighted in the monitoring zone during the pre-dumping monitoring period, type of marine species identified (where possible), general comments on animal behaviour, description of mitigation measures undertaken (e.g. location of fauna monitored until it exited the monitoring zone. Dumping did not occur until fauna exited the monitoring zone), time (commencement of dumping) and time (completion of dumping).	<p>Marine fauna observations were logged and are contained in MFO Field Logs and spreadsheets. There were no incidents of injury or death to marine fauna during dredging or dumping activities.</p> <p>MFOs conducted operations in compliance with commitments within the Contractor Dredging Environmental Management Plan (Pilbara Ports reference: A1533502) and Dredging and Spoil Disposal Management Plan (Pilbara Ports reference: A1534128).</p> <p>The Contractor has provided MFO Logs to Pilbara Ports. The logs contain all marine fauna observations within the monitoring zone during dredging and dumping activities: fA161016</p>	Compliant
Table 9	Report any incidents involving the dredging or dumping activities that result in injury or death to any marine megafauna to Pilbara Ports Dredging and Survey Manager and Pilbara Ports Environment and Heritage department as soon as practicable but within 12 hours. Record the date, time and nature of each incident as well as a description of the species involved. Notify DCCEEW of any incidents involving the dredging or dumping activities that result in injury or death to any marine megafauna.	<p>There were no incidents resulting in injury or death to marine megafauna during dredging or dumping activities. A deceased green turtle washed ashore within the Project area and was reported and immediately investigated by Department of Biodiversity, Conservation, and Attractions (DBCA). DBCA staff determined the injuries were most likely sustained by non-project related vessel strike (outboard engine skeg) by smaller recreational vessel.</p> <p>Report was logged in Pilbara Ports Incident Management System, Incident # 10854. Pilbara Ports reference: A1926332</p>	Compliant
Table 10	WA Department of Primary Industries and Regional Develop (DPIRD 's) 'Vessel Check' risk assessment (https://vesselcheck.fish.wa.gov.au)	Dredging Vessels mobilised from outside of Western Australian waters were subject to Invasive Marine Species (IMS) risk assessments. All vessels	Compliant

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	submitted to Pilbara Ports (including supporting documentation) for all dredging and support vessels (i.e., Dredge vessel and Barges) that mobilise to the Port of Dampier from interstate or international waters. Risk assessment must indicate that the vessel poses a low risk of IMP to Port of Dampier waters.	assessed were determined to represent a low risk of introducing an Invasive Marine Species to WA. IMS assessment of dredging vessels contained at Pilbara Ports reference: fA135454	
Table 10	All vessels will have a ballast water management plan and ballast water exchanges will be in accordance with IMO requirements and the Commonwealth <i>Biosecurity Act 2015</i> .	Ballast water management is a requirement of entering Australian waters. The Biosecurity Status Document obtained from the Department of Agriculture, Fisheries and Forestry mandates that if ballast is to be discharged, a Ballast Water Report must be submitted in accordance with the <i>Biosecurity Act 2015</i> . Management of ballast water is included within the Contractor's Dredging Environmental Management Plan. Pilbara Ports reference: A1533502	Compliant
Table 10	Continue to implement the State Wide Array Surveillance Program (SWASP) in collaboration with DPIRD and WA Port Authorities within Western Australia.	Pilbara Ports continues to participate in the SWASP. Pilbara Ports coordinates deployment of monitoring equipment at numerous sites throughout the Pilbara. There have been no discoveries of new invasive marine pests. <i>Didemnum perlucidum</i> was detected at the Port of Dampier; however, this species has been previously detected at the Port of Dampier and is considered cryptogenic and widespread within Western Australian waters. Past and current SWASP information is at Pilbara Ports reference: fA136793 SWASP Monitoring Reports are generated by DPIRD. There have been no detections of	Compliant

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		<p>Introduced Marine Pests requiring reporting to DPIRD.</p> <p>SWASP Monitoring Reports are contained at Pilbara Ports reference: fA136793</p>	
Table 10	Ballast water management undertaken in accordance with IMO and Commonwealth <i>Biosecurity Act 2015</i> requirements.	<p>Ballast water management is a requirement of entering Australian waters. The Biosecurity Status Document obtained from the Department of Agriculture, Fisheries and Forestry mandates that if ballast is to be discharged, a Ballast Water Report must be submitted in accordance with the <i>Biosecurity Act 2015</i>.</p> <p>Management of ballast water is included within the Contractor's Dredging Environmental Management Plan. Pilbara Ports reference: A1533502</p>	Compliant
Table 10	Notify DPIRD if the introduction of IMPs is suspected in accordance with existing procedures under the collaborative SWASP.	<p>Pilbara Ports continues to participate in the SWASP. Pilbara Ports coordinates deployment of monitoring equipment at numerous sites throughout the Pilbara.</p> <p>There have been no discoveries of new invasive marine pests. <i>Didemnum perlucidum</i> was detected at the Port of Dampier; however, this species has been previously detected at the Port of Dampier and is considered cryptogenic and widespread within Western Australian waters.</p> <p>Past and current SWASP information is at Pilbara Ports reference: fA136793</p> <p>SWASP Monitoring Reports are generated by DPIRD. There have been no detections of Introduced Marine Pests requiring reporting to DPIRD.</p>	Compliant

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		SWASP Monitoring Reports are contained at Pilbara Ports reference: fA136793	
Table 11	Dredge vessels shall have and implement a Shipboard Oil Pollution Emergency Plan (SOPEP), including having spill control equipment/materials available on board	<p>The Baldur has a Shipboard Oil Pollution Emergency Plan, has ample spill response equipment, and conducts Shipboard Oil Pollution Emergency Plan (SOPEP) drills. Evidence of drills are contained in Project / Vessel Daily Progress Reports.</p> <p>An audit of the dredging contractor was conducted on 12 December 2024 and 27 February 2025. All conditions of the SDP and commitments within the Dredge Environmental Management Plan were complied with. Images showing compliance with this commitment are contained at Pilbara Ports reference: qA41492 (folder 7c and 7d)</p>	Compliant
Table 11	All equipment on board to be maintained and inspected in accordance with the manufacturer's recommendations or dredging contractor's vessel management systems in order to minimise the risk of hydrocarbon leaks.	<p>The Baldur has an electronic maintenance system which schedules required works and servicing. Servicing is undertaken by the vessel's Chief Engineer or Superintendent.</p> <p>An audit of the dredging contractor was conducted on 12 December 2024 and 27 February 2025. All conditions of the SDP and commitments within the Dredge Environmental Management Plan were complied with. Images of Baldur's electronic management system are available at Pilbara Ports reference: qA41492 (folders 7c and 7d)</p>	Compliant
Table 11	Report any discharge of hydrocarbons to the marine environment (irrespective of quantity / volume) to Pilbara Ports Vessel Traffic Services without delay on 08 9159 6556 or VHF Ch 11 or 16.	Incidents of hydrocarbon discharge to the marine environment are reported promptly. Incidents are collated on the Project's Electronic Management Register, which contains links to environmental incident reports and investigations.	Compliant

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		Incidents are logged via the DBHF - Safety and Environment Electronic Management Register and Pilbara Ports Incident Management System. Pilbara Ports reference: A1892054	
Table 11	All reports provided to WA Department of Transport (DoT) electronically via "Pollution Report" (POLREP) form in accordance with Pilbara Ports Port of Dampier Handbook.	<p>All incidents of hydrocarbon discharge to the marine environment were reported to DoT. Reporting and investigations are recorded in Pilbara Ports Incident Management System and collated in the Project's Electronic Management Register.</p> <p>Incidents are logged via the DBHF - Safety and Environment Electronic Management Register and Pilbara Ports Incident Management System. Pilbara Ports reference: A1892054</p>	Compliant
Table 11	A documented report provided to the Pilbara Ports Dredging and Survey Manager on the incident, including (as a minimum) details of the incident, the measures taken, the success of those measures in addressing the incident or risk and any additional measures proposed to be taken.	Reports are provided as part of Incident Management System reporting requirements. For an example of reporting for a spill of hydrocarbon to the marine environment, see Pilbara Ports reference, Incident ID 10448.	Compliant
Table 11	Implement oil spill response measures in accordance with the requirements of Pilbara Ports Marine Pollution Contingency Plan for the Port of Dampier	<p>Hydrocarbon spills to the marine environment are reported through to Vessel Traffic Services (VTS). VTS informs the Pilbara Ports Harbour Master, who then implements response according to "Port of Dampier Marine Pollution Contingency Plan".</p> <p>An audit of the dredging contractor was conducted on 12 December 2024 and 27 February 2025. All conditions of the SDP and commitments within the Dredge Environmental Management Plan were complied with. Pilbara Ports reference: qA41492 (Folder 7c and 7d).</p>	Compliant

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Table 12	All vessels to comply with the requirements of the Port of Dampier Handbook Section 39.1 Management and Discharge of Shipboard Wastes. This includes sewage, grey water, oil or oily mixtures, garbage, cargo hold and deck washing / cleaning and waste incineration	An audit of the dredging contractor was conducted on 12 December 2024 and 27 February 2025. All conditions of the SDP and commitments within the Dredge Environmental Management Plan were complied with. Waste discharge records and garbage disposal management plan was in place. Images of waste manifest and waste transfer are available at Pilbara Ports reference: qA41492 (Folder 7d)	Compliant
Table 12	Controlled waste, including hydrocarbons and oily water, shall be stored in appropriately labelled receptacles and be correctly disposed of ashore not to be discharged to sea. Controlled waste shall be disposed of ashore (as required) via licenced controlled waste contractor, and waste tracking sheets to be retained.	Controlled waste, including hydrocarbons and oily water, are stored in appropriately labelled receptacles and have been correctly disposed of ashore with no discharge to sea. An audit of the dredging contractor was conducted on 12 December 2024 and 27 February 2025. All conditions of the SDP and commitments within the Dredge Environmental Management Plan were complied with. Images of waste manifest and waste transfer are available in folder 7d at Pilbara Ports reference: qA41492	Compliant
Table 12	Solid and liquid wastes and hazardous materials shall be stored in appropriately labelled receptacles and be correctly disposed of ashore (as required) through a licenced waste contractor, and waste tracking sheets to be retained.	Solid and liquid wastes and hazardous materials were stored in appropriately labelled receptacles and were correctly disposed of ashore (as required) through a licensed waste contractor. Waste tracking sheets were retained. An audit of the dredging contractor was conducted on 12 December 2024 and 27 February 2025. All conditions of the SDP and commitments within the Dredge Environmental Management Plan were complied with. Images of waste manifest and waste transfer are available in folder 7d at Pilbara Ports reference: qA41492	Compliant

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Table 12	Number of incidents where waste has entered the marine environment, or incorrect storage / segregation.	<p>There were no reported or detected incidences of incorrect storage or segregation of waste.</p> <p>An audit of the dredging contractor was conducted on 12 December 2024 and 27 February 2025. All conditions of the SDP and commitments within the Dredge Environmental Management Plan were complied with. Images of waste storage and segregation are available in folders 7c and 7d at Pilbara Ports reference: qA41492</p>	Compliant
Table 12	To mitigate the risk of waste and/or hydrocarbon pollution impacting EPBC listed marine fauna and EPBC listed birds: All waste must be stored in labelled containers which can accommodate the type, volume, and frequency of use and with covers or lids that close effectively and are used effectively to prevent the escape of waste whether aided by wind, fauna, spillage or other circumstance.	<p>There were no reported or detected incidences of incorrect storage or segregation of waste.</p> <p>An audit of the dredging contractor was conducted on 12 December 2024 and 27 February 2025. All conditions of the SDP and commitments within the Dredge Environmental Management Plan were complied with. Images of waste storage and segregation are available in folders 7c and 7d at Pilbara Ports reference: qA41492</p>	Compliant
Table 12	Certificate to demonstrate sewage treatment / disinfection system is approved in accordance with MARPOL and International Sewage Prevention Certificate provided to Pilbara Ports.	<p>The Baldur has a current International Sewage Pollution Prevention Certificate, valid to 17 February 2026.</p> <p>Pilbara Ports reference: A1945145</p>	Compliant
Table 12	<p>Reporting evidence:</p> <ul style="list-style-type: none"> Vessel garbage disposal log for all discharges to shore Waste delivery receipts for all discharges to shore. Controlled waste tracking forms for controlled waste (hydrocarbons and oily water). 	<p>Vessel garbage disposal and waste discharge evidence was collected and incidents reported.</p> <p>An audit of the dredging contractor was conducted on 12 December 2024 and 27 February 2025. All conditions of the SDP and commitments within the Dredge Environmental Management Plan were complied with. Images of waste manifest and waste</p>	Compliant

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	<ul style="list-style-type: none"> Any incident of discharge (e.g., uncontrolled or unauthorised) of solid or liquid wastes to the marine environment (irrespective of quantity / volume) shall be reported to PPA Vessel Traffic Services without delay on 9159 6556 or VHF Ch 11 or 16. A documented report on any solid or waste spill incident shall be submitted to Pilbara Ports Dredging and Survey Manager, including (as a minimum) details of the incident, the response measures taken, the success of those measures in addressing the incident or risk and any additional measures proposed to be taken. 	<p>transfer are available in folder 7d at Pilbara Ports reference: qA41492</p> <p>All incidents were reported and documented within the DBHF - Safety and Environment Electronic Management Register and Pilbara Ports Incident Management System. Pilbara Ports reference: A1892054</p>	