5. MONITORING

Monitoring is required to assess of the effectiveness of *Phytophthora* Dieback management controls and will be conducted according to scheduled timetables and on an as-need basis depending on rainfall events and annual climate trends. Monitoring will be undertaken by accredited Dieback Interpreters where required, with Iluka personnel undertaking ongoing field surveillance throughout the year. Components of the Eneabba mine site monitoring programme are provided in **Table 7** below.

As a follow up to the 2007 assessment (Glevan Consulting 2007) a *Phytophthora cinnamomi* occurrence assessment of IPL South, as well as the East and West Operational Areas (Glevan Consulting 2009) was completed to take advantage of the improved disease expression which resulted from above average rainfall in Spring 2008 (**Appendix 5**).

Table 7 *Phytophthora* Dieback Monitoring Program

Parameter	Frequency	Location	Purpose	Responsibility
Phytophthora Dieback Assessment	Biennially	Iluka tenements and adjacent areas which may pose a risk of introduction of *Phytophthora* Dieback into uninfested areas within tenements	To undertake an assessment of High and Moderate risk areas within and adjacent to Iluka tenements and to determine if the disease status of uninterpretable areas has changed.	Environmental Specialists to coordinate DEC accredited Dieback Interpreters
Field Surveillance	Annually	Known infestation areas within Iluka tenements	To sample known infested areas and assess disease front demarcation and adjust buffer zones as required. To determine rate of spread of the pathogen (if any).	Environmental Specialists
Access controls	As required	In-field hygiene stations and signage	To ensure compliance of hygiene stations and field demarcation signage with this Management Plan	Environmental Specialists
Rehabilitation Monitoring	Annually	Rehabilitation Areas	To sample any suspected new infestations in rehabilitation blocks	Rehabilitation Coordinator and Environmental Specialists
In-Field Assessment and Spot Sampling	As disease expression improves following rainfall events	Known or suspected infested sites	To improve demarcation of known infestation sites and ensure appropriate management strategies are in place	Environmental Specialists
Review of Action Plans	Quarterly	Dependent on Action Plan	To ensure appropriateness of Action Plans	Environmental Specialist and Production Superintendents
Process Spot Sampling	Opportunistically following rainfall events	Within process streams	To determine if *Phytophthora* species have been accidentally introduced into the process stream	Environmental Specialists

6. CONTINGENCIES

Remedial actions have been developed if monitoring indicates that the environmental objectives for *Phytophthora* Dieback management are not being, or may not be, achieved (**Table 8**)

Table 8 Triggers and Remedial Action Should Environmental Objectives Not be Achieved

Trigger	Action	Responsibility
Non-adherence to hygiene procedure (to be recorded as Environmental Incident) e.g. vehicles not washed down as required, breaches of access controls.	1. Raise Lost Control Card 2. Investigate cause and assess risk to uninfested areas. 3. Review procedures, (hygiene measures, training, signage etc) 4. Monitor the effectiveness of remedial actions taken.	Environmental Specialists
Observations suggest the possibility that *Phytophthora* Dieback has spread into new area.	1. Identify potential source(s) and vector(s). 2. Investigate through sampling and assessment if the pathogen is present (if present, determine species type) 3. Update operational maps if required 4. Review management controls, seeking further advice from relevant authorities if required. 5. Implement revised Dieback control methods and continue monitoring.	Environmental Specialists
Evidence of *Phytophthora* Dieback spread into adjacent areas including Nature Reserves	1. Immediately notify adjacent landowners and relevant authorities 2. Establish cause and instigate remedial measures (including vector control management) 3. Monitor the effectiveness of remedial actions taken	Environmental Specialists
Phytophthora Dieback detected in rehabilitation areas	1. Determine the extent of the infected area, cause and vector agent 2. Take action to prevent any further spread of the infection (quarantine and vector control) 3. Consider planting Dieback indicator species around the infected area to aid in boundary demarcation and provide a warning system for further spread.	Rehabilitation Superintendent Environmental Specialist

In some instances, contingency actions may be subject to special considerations depending on topography and natural values in the immediate risk area. Contingency plans may include reinstating drainage lines to divert them away from infested areas, or building traps to contain surface runoff from infested areas.

Rehabilitation will consider species selections for sites that are likely to be infested with *Phytophthora* Dieback so as to reinstate the ecological function and create a self-sustaining vegetation community. Susceptible species that provided foraging habitat for fauna will be replaced with more resistant species where possible. Rehabilitation areas that pose a moderate risk of being infested will be revegetated using both susceptible and resistant species and be monitored for confirmation of the disease status and consequent changes to the risk determination for those areas.

Design of final landform will consider proximity and topographical location in relation to known existing infestations so as to avoid low risk areas becoming infested through autonomous spread of the pathogen. Iluka will support appropriate research that contributes to the control, management and extermination of *Phytophthora* Dieback (Section 8).

7. STAKEHOLDER CONSULTATION AND INVOLVEMENT

Iluka will engage in regular consultation with stakeholders regarding *Phytophthora* Dieback management, including the following;

- Department of Environment and Conservation
- Northern Agricultural Catchment Council
- Local Government Authorities
- Industry groups
- Centre for *Phytophthora* Science and Management (CPSM)
- The Wildflower Society

Iluka is an active member of the Northern Sandplains Dieback Working Party and is committed to continuing this association to ensure appropriate management strategies are implemented across the Northern Sandplains Region.

8. RESEARCH

Appropriate targeted research is the cornerstone to good *Phytophthora* Dieback management. Iluka has a history of supporting research and development programs since the discovery of the pathogen in the Midwest region in the early 1990's. Early support included programs such as:

- 1990 - inaugural member of the Northern Sandplains Dieback Working Party (NSDWP) which supported regional mapping, local field days, forums, PhD student support, training videos, press releases and presentations to the Minister for Environment.
- 1995 - MERIWA Project M188/M247 (Biology and ecology of *Phytophthora citricola* in native plant communities affected by mining)
- 2000 - MERIWA Project M280 (The potential of the fungicide phosphite to control Phytophthora cinnamomi in native plant communities associated with mining)
- 2003 - MERIWA Project M357 (A sampling strategy for *Phytophthora* for "Difficult" sites)

Current research and development planning supports programmes at the Centre for *Phytophthora* Science and Management (CPSM) at Murdoch University and Curtin University with additional support for regional programmes run by the Northern Agricultural Catchments Council (NACC). A range of research themes are supported such as, eradication programmes, life-cycle definition studies, and survivability of *Phytophthora cinnamomi* at depth and within typical sand mine process streams. Research objectives and commitments are reviewed annually.

9. REVIEW, AUDITING & REPORTING

9.1 Review

This management plan will be reviewed and revised by Iluka on a biennial basis and will consider the following:

- Changes to the project or its operations
- Issues raised by stakeholders through the submission of the Annual Environmental Review
- Issues raised through stakeholders in response to any incident which results in a failure to meet any of the commitments to manage *Phytophthora* Dieback
- The latest outcomes of both internal and external research and development programs

When requested the plan will be made available for review by the Northern Sandplains Dieback Working Party and the DEC.

9.2 Auditing

This Management Plan will be audited annually in compliance with the Iluka EHSMS auditing system.

9.3 Reporting

Performance Reporting

Performance against this *Phytophthora* Dieback Management Plan will be reported to the CEO of the DEC through Iluka's Annual Environment Report (AER). Biennial survey/sampling results will be included as an appendix to the AER.

Incident Reporting

In accordance with the Iluka Loss Control Card reporting system, any non-compliance with this management plan will be reported to Iluka site management. Incidents will be ranked for actual and potential risk using the Iluka Risk Ranking Matrix Incidents Reports and associated actions will be entered into the Cintellate database system to track completion of actions.

Complaint Handling

Public complaints will be handled and recorded through the Iluka Community Comments and Complaints Procedures.

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APPENDIX 1– Risk Tables and Matrix

LIKELIHOOD RATING				
Rating	**Descriptor**	**Definition**	**Probability**	**Frequency**
1	Extremely remote	The event is not expected to occur in most circumstances	1-5%	Less than once in 100 years
2	Remote	The event is not expected to occur in most circumstances	6-10%	At least once in 100 years
3	Rare	The event may occur only in exceptional circumstances	11-20%	At least once in 50 years
4	Unlikely	The event could occur at some time	21-49%	At least once in 25 years
5	Possible	The event should occur at some time	50-75%	At least once in 10 years
6	Likely	The event will probably occur in most circumstances	75-90%	At least once in 2 years
7	Almost Certain	The event is expected to occur in most circumstances	91-99%	At least once per year

CONSEQUENCE RATING				
Rating	**Descriptor**	**Environment**	**Reputation**	**Compliance**
1	Insignificant	Limited damage to area of low significance	Public concern restricted to public complaint	Technical breach of legal obligations without fines or damages claims
2	Minor	Minor effects on biological or physical environment	Minor, adverse local public or media attention and complaints	Breach of legal obligations resulting in minor penalties or damages claims
3	Moderate	Moderate, short-term effects locally, but not affecting ecosystem function	Attention form media and/or heightened concern by local community. Criticism from NGOs	Breach of legal obligations resulting in moderate penalties or damages claims
4	Significant	Serious medium term environmental affects	Significant adverse national media/public/NGO attention	Breach of legal obligations resulting in significant penalties or damages claims
5	Major	Very serious, long-term environmental impairment of ecosystem function	Serious public or media outcry (international coverage)	Breach of legal obligations resulting in major penalties or damages claims, or prosecution.
6	Critical	Critical impact on highly valued species or significant impact on ecosystem function	International multi-NGO and media condemnation	Breach of legal obligations resulting in critical penalties or damages claims, prosecution of directors or senior managers, or loss of ability to operate specific operational areas.
7	Catastrophic	Catastrophic impact on highly valued species, habitat or long-term environmental impairment of ecosystem function	Prolonged international condemnation	Breach of legal obligations resulting in catastrophic penalties or damages claims, imprisonment of directors or senior managers, or loss of ability to operate multiple operational areas.

CONSEQUENCE RATING							
LIKELIHOOD RATING	1	2	3	4	5	6	7
7	7	14	21	28	35	42	49
6	6	12	18	24	30	36	42
5	5	10	15	20	25	30	35
4	4	8	12	16	20	24	28
3	3	6	9	12	15	18	21
2	2	4	6	8	10	12	14
1	1	2	3	4	5	6	7

RISK RATING	DESCRIPTOR
28 - 49	Catastrophic
21 - 27	Major
14 - 20	Moderate
7 - 13	Minor
1 - 6	Insignificant

APPENDIX 2 – Hygiene Procedures

Functional Location	Description
	VEHICLE HYGIENE (IN FIELD) – DIEBACK
	Procedure forHEAVY vehicle clean-down when leaving Phytophthora Dieback Infested area

Protective equipment required:	
Additional Equipment / Tools	Chlorine liquid (Sodium Hypochlorite 12.2%) if required for disinfection Mobile wash-down equipment (if required) Stiff brushes, shovels, crow bar Footbath with chlorine or phytoclean for operators and tools
Hazards / Safety	Uneven surfaces, Working at height, Working under equipment, Manual handling, Trip hazard, Operating high pressure cleaner, Splash-back from hard surfaces, Slippery surface under foot, working with chemicals
Isolations	N/A

TASK	STEPS	KEY POINTS
1. Prior to leaving work area	1. Contact supervisor and/or Iluka Environmental Dept to identify appropriate hygiene equipment suited to equipment that requires clean-down and inspection. 2. Ensure a 'VEHICLE INSPECTION (FIELD SHEET)' is available. 3. Determine the level of hygiene required depending on weather conditions and soil moisture (ie: Dry brushing, high pressure cleaning or chlorine rinse). Refer to VEHICLE INSPECTION (FIELD SHEET).	VEHICLES CANNOT LEAVE HYGIENE INSPECTION POINT WITHOUT AUTHORIZED "VEHICLE INSPECTION FIELD SHEET" SIGN-OFF

2. De-mobilizing from work area	4. Proceed to Dieback Hygiene Point (**DHP**) and park up <u>in front of DHP</u> for primary inspection. 5. Standard tramming procedure when transiting work areas. 6. Vehicles must remain within Dieback infested area at all times until hygiene completed.	ALL VEHICLES MUST PASS HYGIENE INSPECTION BEFORE LEAVING WORK AREA
3. Pre-inspection	7. Ensure vehicle is appropriately 'isolated' before conducting inspections of running gear etc. 8. Caution: follow any vehicle specific isolations or procedures before working under, on top of, or between articulation/pinch points, transmission or hydraulic arms etc. 9. Inspect all surfaces that have come into contact with dieback contaminated soil (including inside of vehicle cabin). 10. Remove any 'heavy soiling' by shovel or other means (large clay balls, oversize, significant build-up of sand etc on transmission, chains etc). 11. Inspect all areas for vegetative material (roots, bark, branches, seeds, weeds etc) and remove. 12. All material removed must remain within the Dieback infested area.	Maintain proper manual handling technique if shovelling, hammering or pulling.
4. Primary cleaning	13. Advance onto the first half of the DHP ramp. (ensure all of vehicle is on the ramp). 14. Ensure vehicle is appropriately Iiolated and safe to prevent rolling off DHP ramp. 15. Caution: follow any vehicle specific isolations or procedures before working under, on top of, or between articulation/pinch points, transmission or hydraulic arms etc. 16. Check operational condition of wash-down unit if required (contact appropriate supervisor for instructions). 17. Using appropriate cleaning method identified at STEP 3, conduct primary cleaning of all surfaces to ensure all loose or remaining hard compacted soil is removed. 18. TRACK VEHICLES: Make sure the underside of tracks are inspected and cleaned before proceeding to the next stage.	Use appropriate PPE when using water cleaners or when dusty. Beware of splash-back if using high pressure cleaners.
5. Final wash-down	19. Advance onto second half of DHP ramp with additional operator or inspector checking underside of wheels tracks etc to ensure minimal contaminated material advances to the final clean-down stage. 20. Use secondary separation material such as conveyor belt if required (check with Iluka Environmental Dept). 21. Ensure vehicle is appropriately isolated and safe to prevent rolling off DHP ramp. 22. Caution: follow any vehicle specific isolations or procedures before working under, on top of, or between articulation/pinch points, transmission or hydraulic arms etc. 23. Final inspection should include (where appropriate), under engine compartment hoods, operators compartment (foot rest, pedals etc), and in extreme dust conditions, dust extractors or filter box's. 24. In moist soil conditions, final rinse with water dosed with chlorine (drinking water standard).	Additional PPE is required if using chlorine (refer to SWI for handling concentrated chlorine)

6. Vehicle inspection and sign-off	Prior to moving off the DHP, the operator/supervisor must complete a VEHICLE INSPECTIONS (FIELD SHEET) and have it signed-off by an authorized Iluka person	
EXAMPLE: Dozer at final wash-down (DHP constructed from large oversize sloping towards camera which drains back into dieback infested area)		Left track being cleaned, note impacted hard mud still stuck to right track which has yet to be cleaned. Dozer was moved twice to inspect underside of tracks.
EXAMPLE: Dozer at final wash-down	 	High pressure cleaning of impacted mud on hard-to-get joints on dozer blade Foot bath with chlorine on oversize DHP pad at exit point for operator hygiene while cleaning on oversize pad

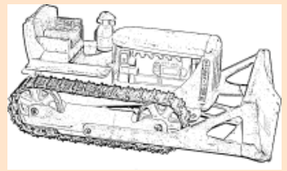
DIEBACK HYGIENE PAD FLOW DIAGRAM – START AT STATION **'A'** WHICH IS IMMEDIATELY *BEFORE* HYGIENE PAD, AND THEN MOVE ONTO PAD TO COMPLETE STATIONS **'B'** AND **'C'**.

A

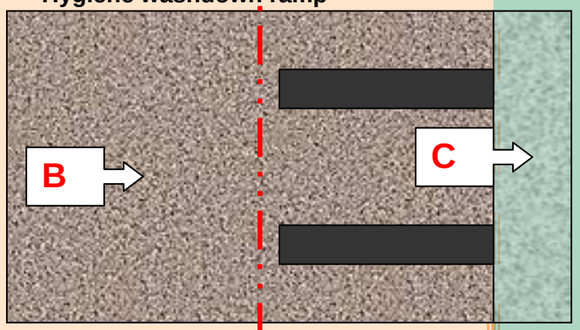
Pre-washdown park-up area

- remove all vegetation
- remove heavy soil/clay using shovel
- clean as much as possible
- keep spoils in the dieback infested area

A

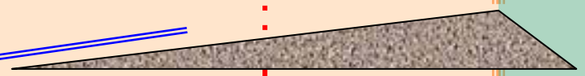


Hygiene washdown ramp



Dieback Free area

All wash water flows back to infested area



Side view of hygiene ramp

B

1st washdown

- high pressure hose down with water
- clean off as much as possible
- concentrate on hard to get at areas (chassis, underside of tracks, engine area and trailing hitches etc.)
- Move forward onto next station and park up on conveyor belt after inspecting all areas.

Dieback infested area

C

2nd washdown

- high pressure hose down with chlorinated water
- conveyor belt as secondary 'isolation' from ground
- focus on new areas of track or tread which were inaccessible at first washdown station
- Inspect inside of cab floor (use chlorinated water with brush if mud is in floor and peddles)
- Inspect footwear, brush and disinfect with chlorine water.

Final inspection and sign-off of "**Vehicle Inspection Field Sheet**"

Author: M.Mannion

Version: 1.5 Date: April 21, 2008

Modified: Date:

IN-FIELD TEMPORARY DIEBACK HYGIENE RAMP FOR HEAVY EARTHMOVING EQUIPMENT

Hygiene ramp constructed with oversize material. Ramp section steps up immediately in front of LV with wash water returning to dieback infested area (vegetation in background)

Side view of hygiene ramp. Surface fall of the hard stand is to the right with surface water return back to infested area.

Initial inspection removed all vegetation (sticks, roots, leaves etc) with heavy soil fouling removed with spade-work.
Dozer then walked onto first part of ramp for initial stiff brush cleaning and high pressure wash. Photo’s show first stage cleaning after dozer walked onto front of ramp.

Dozer walked forward to inspect and wash track guides and behind track shoes. Second stage finished off with chlorine wash with dozer walked onto conveyor belt for final inspection (inset; tool and footbath wash-trough with metal separation mats. Dirty wash side to the left of trough with clean side to the right). Final inspection includes inspection under engine canopy, inside operator cabin with floor brushed and pedals inspected for mud etc.

Vehicle cannot move from final stage inspection without completion and sign-off of a ‘vehicle inspection field sheet’ (see below).

A ‘flow diagram’ was attached to the mobile wash-down tank to reinforce wash/inspection procedure (see below)

APPENDIX 3 – Vehicle and Machinery Hygiene Inspection (Field Sheet)

VEHICLE INSPECTIONS (FIELD SHEET) - DIEBACK HYGIENE

Note: this sheet must be signed off by the operator of the vehicle and an Iluka supervisor.

If in doubt, call Eneabba Environmental Department 9956 9557 (Mike Mannion 0427778935)

ILUKA Eneabba Operations

Vehicle Operator: ……..

Area Supervisor: ……..

1 Date: ……..

2 Area: ……..

3 Inspection site: ……..

4 Weather conditions: ……..

5 Soil conditions: ……..

6 Describe activities undertaken in dieback area:

……

……

Vehicle type (tick):

LV	☐	Dump Truck	☐
Dozer	☐	Other	☐
Excavator	☐		
Loader	☐		
Scraper	☐		

Vehicle identification:……

Hygiene practice undertaken during inspection *(forward signed sheets to Environmental Department)*

1 Was vehicle separated from contaminated soil? ☐

2 Method of separation ……..

3 Was wash water directed back to dieback area? ☐

4 What method of cleaning was used?

Dry brush down	☐
Wet hose down	☐
Chlorine wash	☐
High pressure rinse	☐

Who inspected the vehicle?

Name: ……..

Position: ……..

	yes/no
Is this vehicle free of soil/mud?	☐
Is this vehicle free of vegetation?	☐

Signed:

Operator: ……..

Inspector: ……..

Author: M.Mannion	
Version: 1.5	Date: April 21, 2008
Modified:	Date:

APPENDIX 4 – Ground Disturbance Permit and Approval Process

Ground Disturbance Permit
Midwest Operations

Flow Chart of Internal Approval Process

ILUKA