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## 1. Proposed Activities

Focus Operations Pty Ltd (Focus) is proposing to develop the Dreadnought and Alicia Project (the Project), which encompasses a cutback on the existing Dreadnought open pit and mining of previously approved Alicia open pit to extract gold ore for processing at the nearby Three Mile Hill (TMH) mill.

Focus will require clearing to be conducted to commence both Dreadnought and Alicia open pits. Clearing is also required for supporting mine activities including:

- Waste rock landforms (WRL);
- Run-of-mine (ROM) pad;
- Mine water ponds (MWP);
- Dewatering pipelines;
- Topsoil stockpiles;
- Surface water diversion channels or drains; and
- Other ancillary infrastructure.

A Mining Proposal for the Project will be submitted to Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) in conjunction with other supporting approvals required under applicable legislation prior to commencement of activities.

### 1.1 Location

The Project is located approximately 2km south of the gazetted town site of Coolgardie, which is 40 km southwest of Kalgoorlie-Boulder in the Eastern Goldfields region of Western Australia. The Project is situated within the Shire of Coolgardie local government area and accessed via Focus' network of private haul roads. The Project forms part of a broader tenement package covering the Coolgardie Gold Operations (CGO) owned wholly by Focus and its subsidiaries. The Project regional location is shown in Figure 1.

The Project requires clearing on seven tenements within CGO as detailed in Table 1 below. Proof of ownership of these tenements is provided in **Appendix A**.

*Table 1: Tenement details*

Tenement ID	Holder 1	Holder 2	Area (ha)	Expiry
M15/1114	Focus Minerals Ltd	Focus Operations Pty Ltd	4.43050	14/02/2043
M15/646	Focus Minerals Ltd	Focus Operations Pty Ltd	991.60000	25/03/2035
M15/660	Focus Minerals Ltd	Focus Operations Pty Ltd	11.31000	22/03/2035
M15/958	Focus Minerals Ltd	Focus Operations Pty Ltd	114.30000	14/04/2026
M15/412	Focus Minerals Ltd	-	18.70500	14/02/2031
M15/966	Focus Minerals Ltd	-	554.03000	16/03/2031
M15/1294	Focus Minerals Ltd	Focus Operations Pty Ltd	5.07500	28/03/2043

### 1.2 Disturbance Envelope

Focus is requesting a total allowable clearing area of 220 ha within a disturbance envelope of 407 ha as depicted in Figure 2 and Figure 3 (Note: proposed infrastructure layout is indicative and may change marginally).

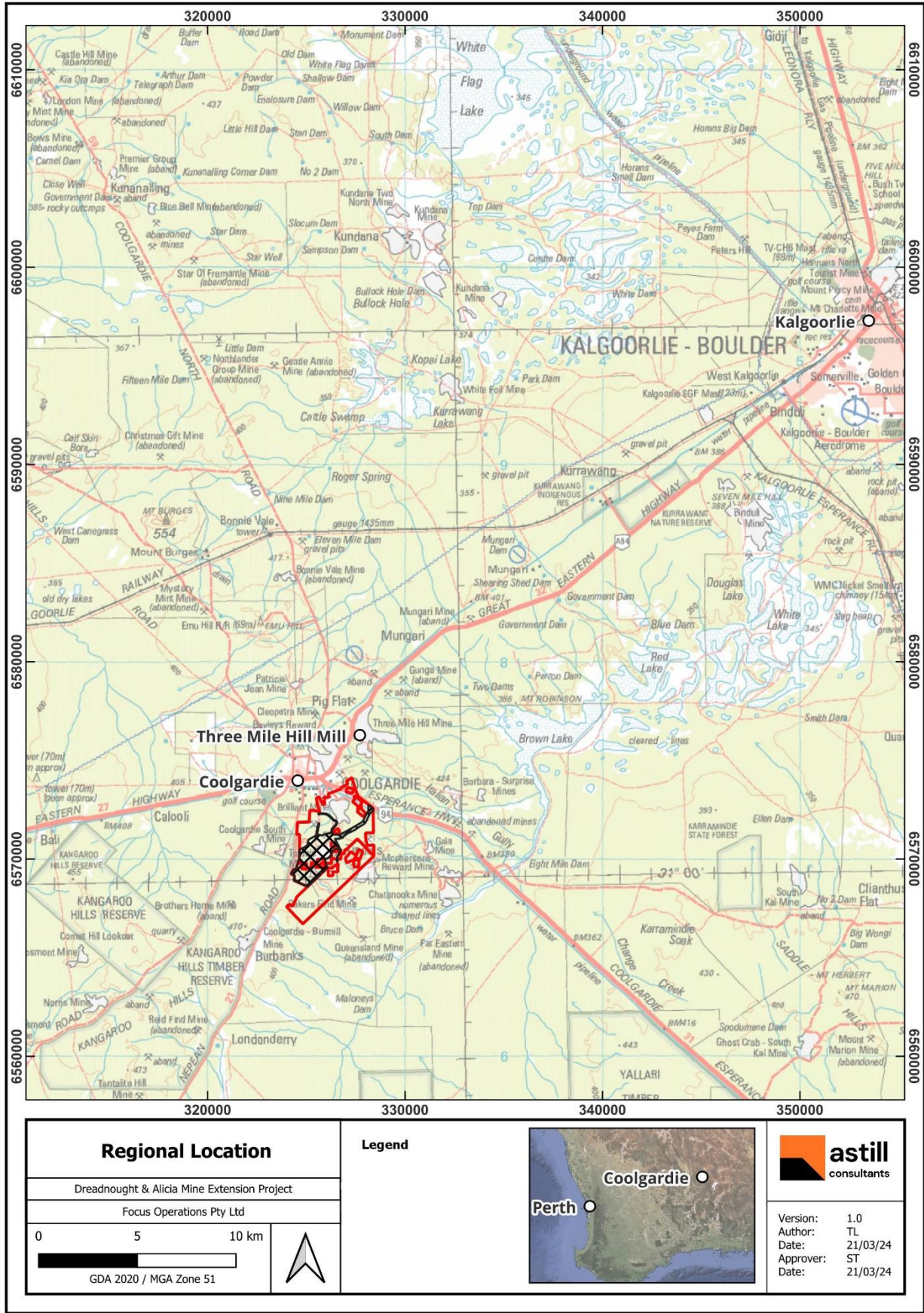


Figure 1: Regional location

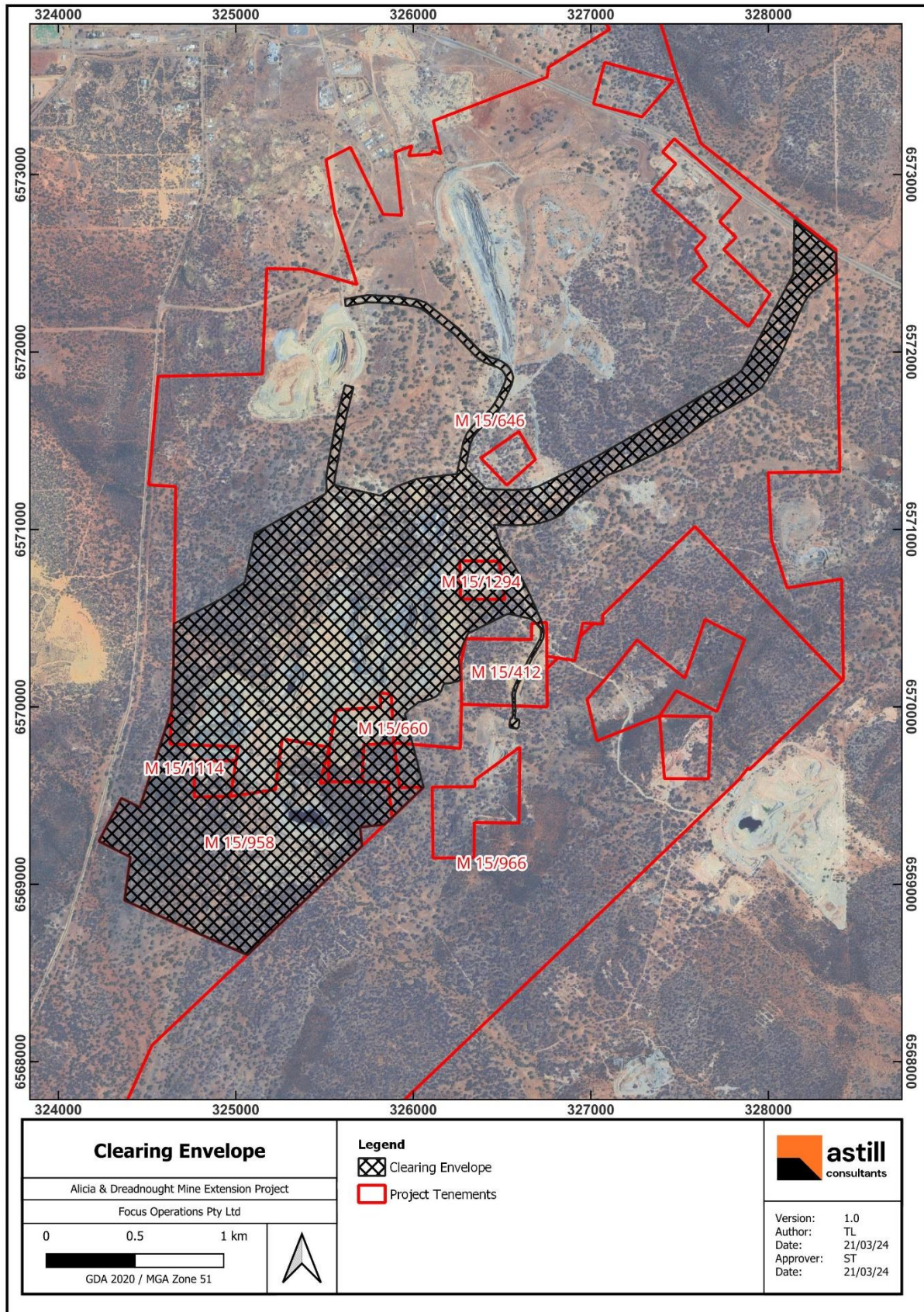


Figure 2: Clearing area

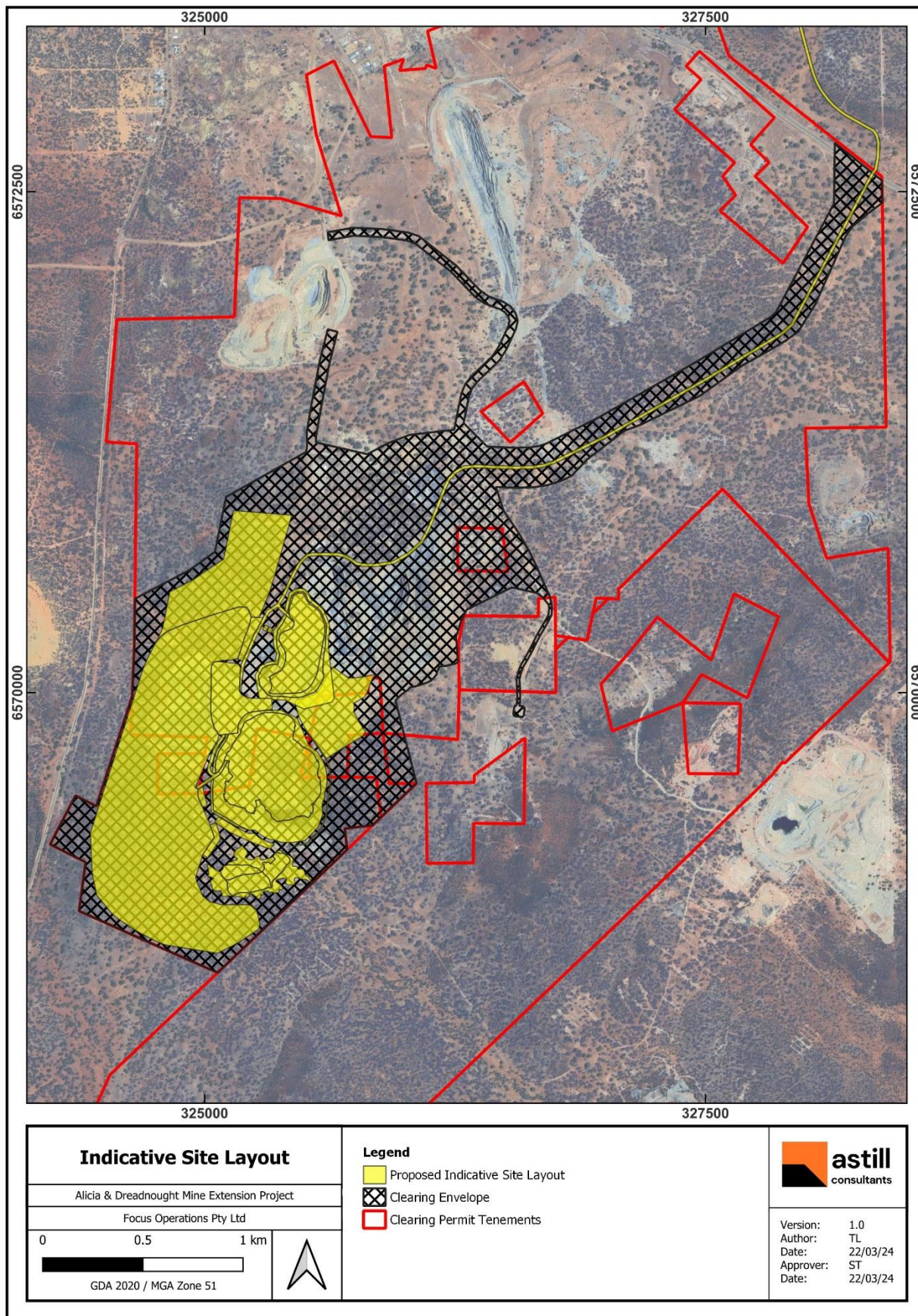


Figure 3: Indicative site plan

## 2. Environmental Setting

### 2.1 Climate

Climate of the Eastern Goldfields subregion is characterised as an arid to semi-arid climate of hot summers and mild winters with annual rainfall of approximately 200 – 300 mm (Beard, 1990; Cowan, 2001). Climate data from Coolgardie’s weather station is presented in Figure 4 below.

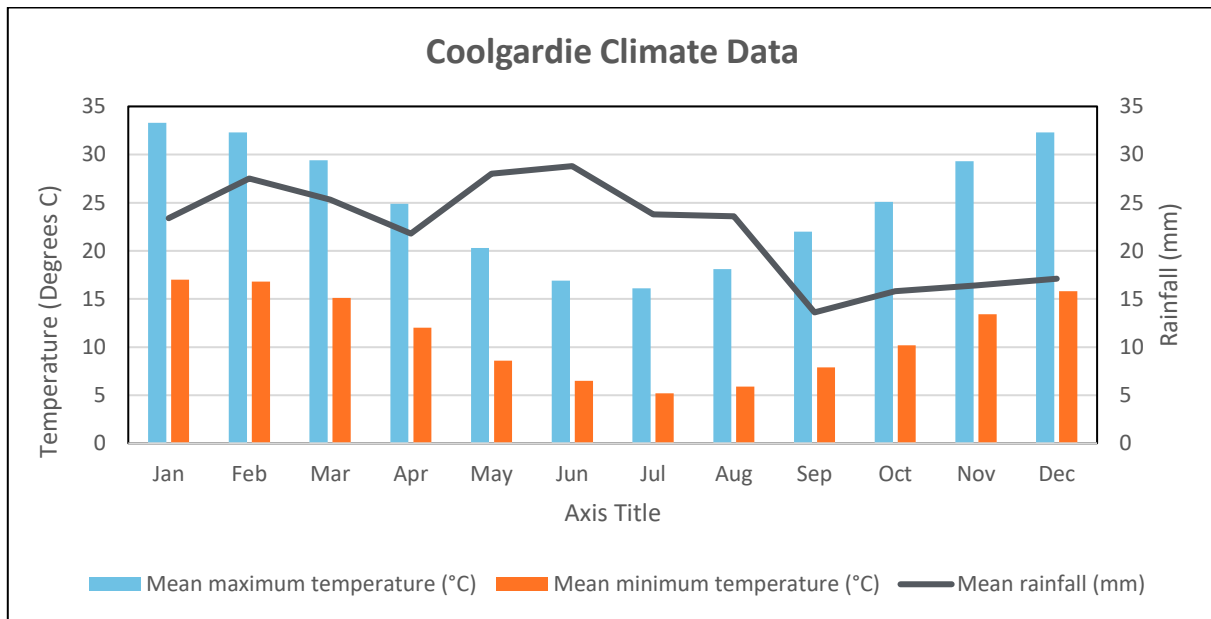


Figure 4: Coolgardie climate data (source: Bureau of Meteorology)

Average long-term annual rainfall is exceeded by average annual evaporation rate (approximately 2,640 mm) by a factor of almost 10 to 1. Evaporation exceeds rainfall in all months of the year, with June having the lowest daily evaporation and January having the highest daily evaporation.

Annual exceedance probability (AEP) is defined as chance that an extreme rainfall event will occur in any given year. Based on AEP calculations by BoM, there is a 1 in 100 (1%) chance that the Project area will receive 50 mm of rain in a 1-hour period, 160 mm for a 24-hour period and 207 mm for a 72-hour period based on AEP calculations (BoM, 2023).

Wind conditions from Kalgoorlie-Boulder airport weather station (#12038) show that morning wind conditions are predominantly easterlies, north-easterlies, and south-easterlies averaging between 12 and 17 km/hr. Afternoon wind direction is variable, and predominantly westerlies, easterlies and south-easterlies averaging between 13 and 18 km / hr.

## 2.2 Landscape

### 2.2.1 Bioregion

The Interim Biogeographic Regionalisation of Australia (IBRA) divides Australia into 89 bioregions based on major biological, geographical and geological attributes. These bioregions are subdivided into 419 subregions as part of a refinement of the IBRA framework (IBRA 2010).

The Project occurs within the Coolgardie bioregion and the Eastern Goldfields subregion (COO3). The Eastern Goldfields subregion lies on Yilgarn Craton's 'Eastern Goldfields Terrains'. The relief is subdued and comprises of gently undulating plains interrupted in the west with low hills and ridges of Archaean greenstones and in the east by a horst of Proterozoic basic granulite. Underlying geology is of gneisses and granites eroded into a flat plane covered with tertiary soils and with scattered exposures of bedrock. Calcareous earths are the dominant soil group and cover much of the plains and greenstone areas. A series of large playa lakes in the western half are the remnants of an ancient major drainage line (Cowan, 2001).

Vegetation of the subregion is dominated by mallees, acacia thickets and shrub-heaths on sandplains. Diverse eucalyptus woodlands occur around salt lakes, on ranges, and in valleys. Salt lakes support dwarf shrublands of samphire. Woodlands and *dodonaea* shrubland occur on basic granitites of the Fraser Range.

### 2.2.2 Soils

The Coolgardie Goldfields are dominated by calcareous earths that cover much of the plains and greenstone areas. Within CGO surface soils tend to comprise red, moist, and well graded sands and sand gravels with traces of silt and clay. The underlying geology is of gneisses and granites eroded into a flat plane covered with tertiary soils and with scattered exposures of bedrock.





The Project area lies entirely within the BB5 land system, as classified by the soil landscapes and land mapping system provided from DPIRD. BB5 is characterised by rocky ranges and hills of greenstones with basic igneous rocks as well as sandplains with brown calcareous loams.


#### 8.1.1 Soil characterisation

Mine Earth were commissioned by Focus to undertake a soil resource assessment for CGO in September 2021, which included five soil sampling locations in undisturbed areas within M15/646 as shown in Figure 5, overlaid with DPIRD soil landscapes. Whilst samples do not directly overlie proposed disturbance footprint of Dreadnought and Alicia open pit disturbances, they are located adjacent and considered highly representative. Soil samples were collected from surface soils up to 200 mm depth, and analysis was undertaken on 0 – 200 mm fractions to understand their rehabilitation implications. Soil profiles are summarised in Table 2 below.



Table 2. Soil profile descriptions

Photo point	Site	Location	Soil profile	Vegetation
	C8	Mid-slope very rocky open ground	<p>0 – 20cm: single grained sandy soil. Abundant roots from 0 to 10cm, decreasing with depth. Approximately 20 to 30% coarse fragments, ranging from 2 to 60mm in size.</p> <p>&gt;20cm: hardpan</p>	60 to 70% open bare rocky ground with scattered eucalypt trees and low shrubs (0.3 to 1m)
	C9	Minor gully – historical disturbance (WRD footprint)	<p>0 – 20cm: loamy soil with massive structure and moderate amount of roots. Approximately 30 to 40% coarse fragments ranging from 2 to 30mm in size.</p> <p>&gt;20cm: hardpan</p>	Large eucalypts, medium shrubs and low shrub storey with 50% bare rocky ground
	C10	Top of rocky knoll	<p>0 – 20cm: weakly structured soil with large polyhedral aggregates in a loose single grained matrix. Moderate amount of roots and approximately 50% coarse fragments ranging from 2 to 100mm in size.</p> <p>&gt;20cm: hardpan/competent rock</p>	Scattered salmon gums and small Acacia trees (2 to 4m) with low storey of shrubs (0.5 to 1m)
	C11	Brilliant (WRD footprint)	<p>0 – 20cm: single grained loamy soil with abundant roots. Approximately 20 to 30% sub-rounded-angular coarse fragments ranging from 2 to 30mm in size.</p> <p>&gt;20cm: hardpan</p>	Bare rock ground with stands of Eucalyptus trees (6 to 8m) and shrubs 1 to 2m of height

	<p>C12</p>	<p>Brilliant (pit footprint)</p>	<p>0 – 20cm: single-grained loamy oxide mine waste with approximately 10 to 20% coarse fragments, 2 to 20mm in size.</p>	<p>Good establishment of self-seeded vegetation. Remnant Eucalyptus trees, well established saltbush and small shrubs (0.2 to 2m tall)</p>
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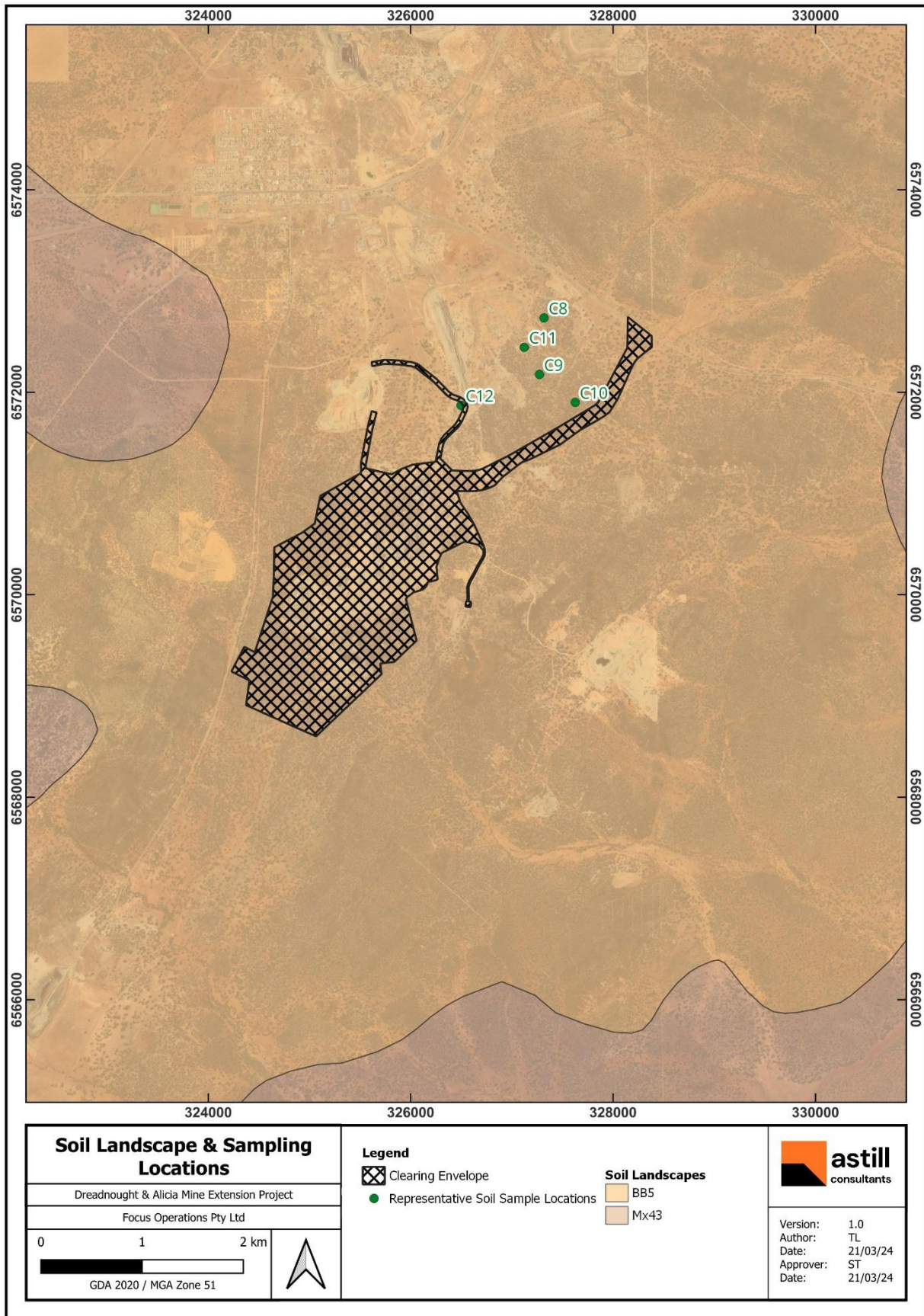


Figure 5: Soil landscape & sampling locations

## 2.3 Biodiversity

### 2.3.1 Biological Surveys

Native vegetation clearing is required to facilitate development of the Project. To support this, multiple biological surveys have been undertaken over the wider Coolgardie Operations Project area with a summary detailed in Table 3 below. Surveys include both desktop and field assessments to determine the likelihood of significant vegetation flora and fauna within the Project area. It is noted that several surveys specifically focus on areas within the Project, while others cover broader areas including areas outside the Project. Biological survey areas are shown in Figure 6 and Figure 7. Relevant biological surveys are provided in **Appendix B**.

*Table 3: Biological surveys*

Survey title	Fieldwork date	Limitations identified	Author / reference
Targeted Flora and Vegetation Survey – Coolgardie Gold Project	November 2020	N/A	Terratree
Targeted Flora Search for <i>Acacia websteri</i> (Priority 1)  Addendum report to Terratree (2021) Targeted Flora & Vegetation Survey – Coolgardie Gold Project	April 2021	N/A	Terratree
Coolgardie <i>Camponotus</i> sp. nr. <i>terebrans</i> Targeted Survey	December 2021	None identified	360 Environmental
Desktop assessment for subterranean fauna for the Coolgardie Gold Project – Alicia, Big Blow, Bonnievale, Brilliant, CNX, Greenfields and Happy Jack Deposit Areas, Coolgardie, Western Australia	May 2022	N/A	Invertebrate Solutions Pty Ltd
CNX Three Mile Hill Coolgardie Gold Project – Biological Surveys	October 2021	None identified	360 Environmental

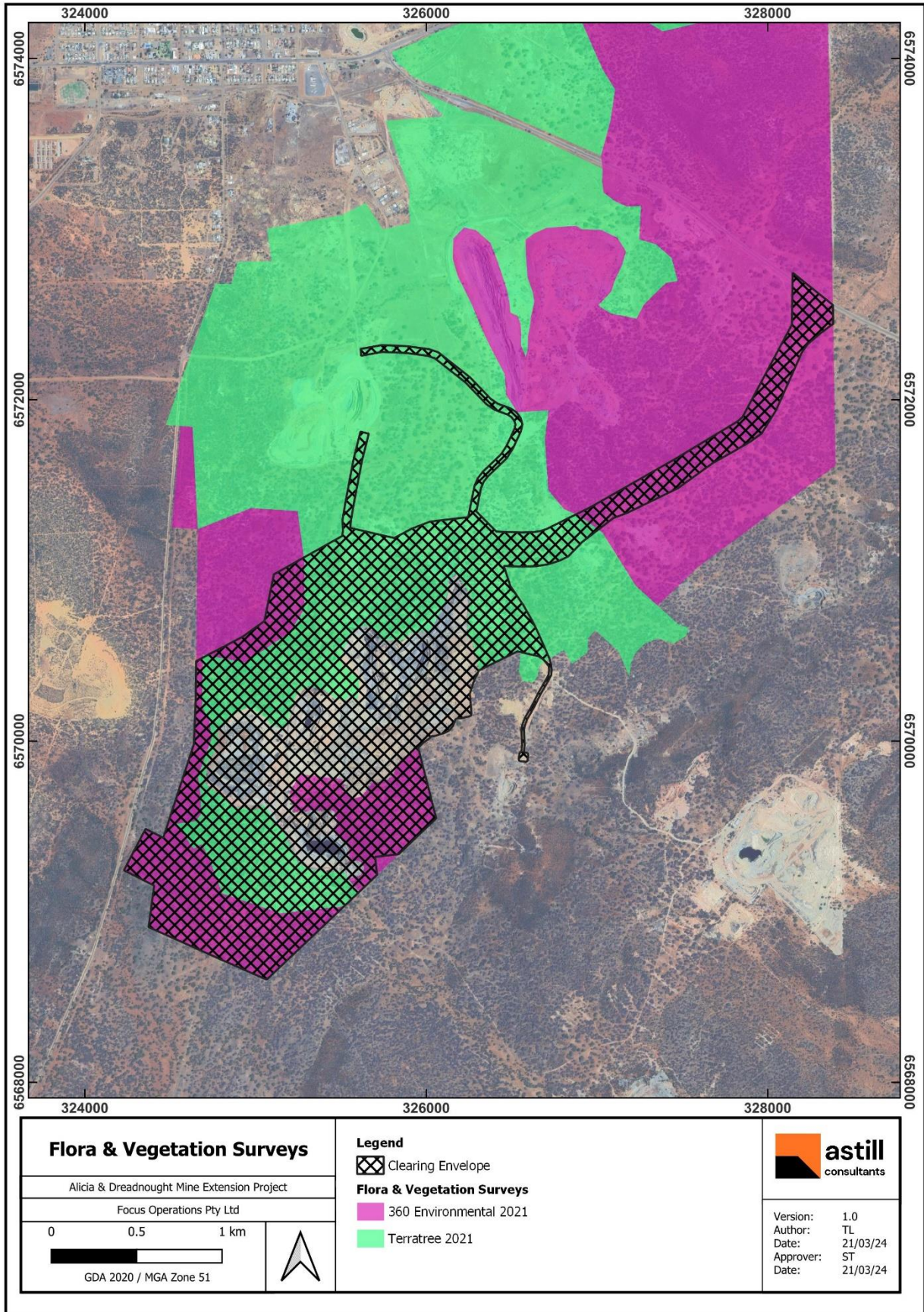


Figure 6: Flora & vegetation surveys

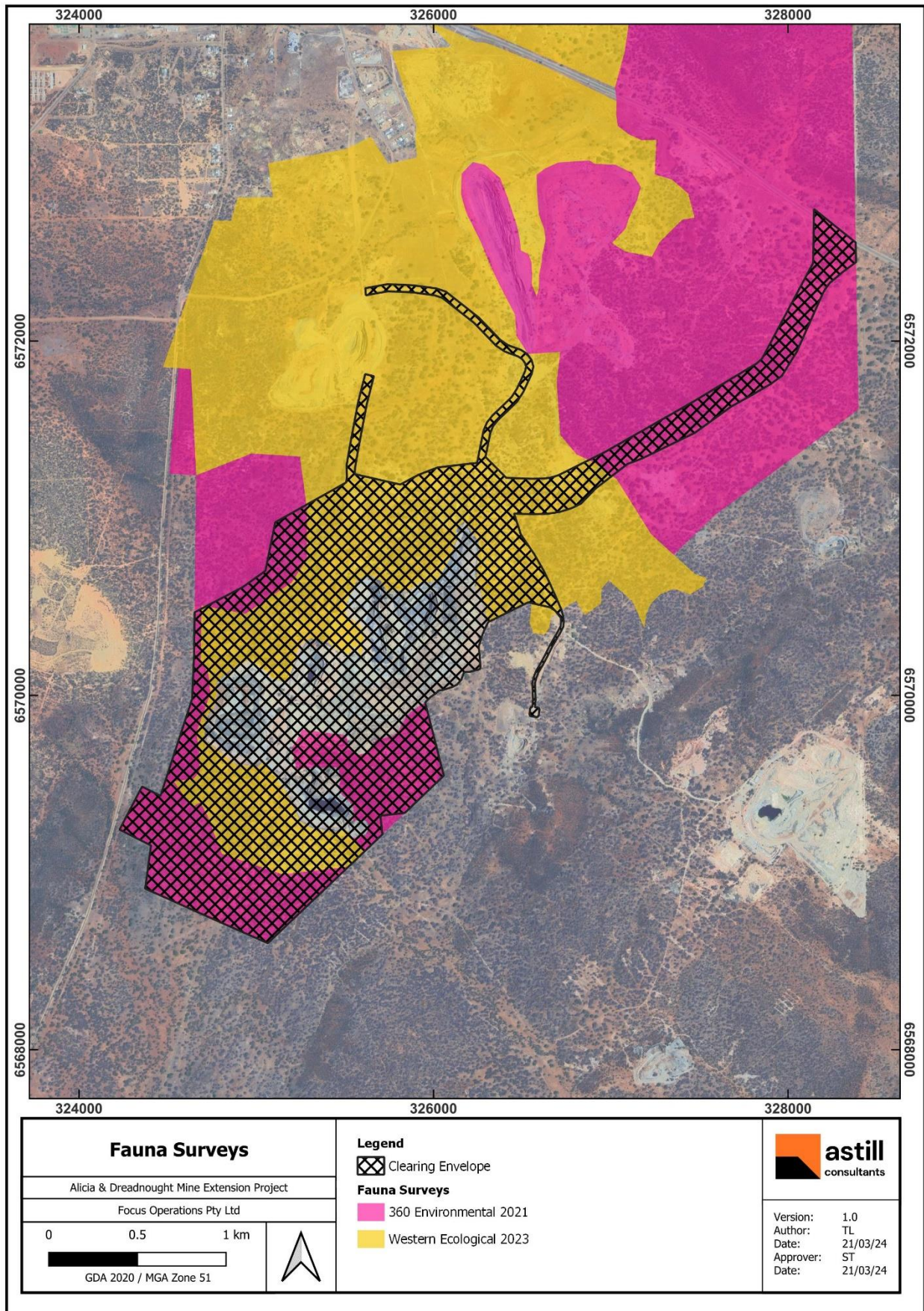


Figure 7: Fauna surveys

### 2.3.2 Vegetation

The Project is located within the Coolgardie Botanical District of the Southwestern Interzone (Beard 1990). This district is comprised primarily of eucalypt woodlands that become more open with an increase in calcareous soils, and an understorey of bluebush and salt bush becomes more evident. The dominant families and genera include the Mimosaceae (*Acacia* spp.), Myrtaceae (*Eucalyptus* spp.), Chenopodiaceae (*Atriplex* spp. and *Maireana* spp.) and Myoporaceae (*Eremophila* spp.).

Pre-European vegetation association dataset (DPIRD, 2019) indicates that the Project area is located within one vegetation association. Areas retaining less than 30% of their pre-European vegetation extent generally experience exponentially accelerated species loss, while areas with less than 10% are considered “endangered” (EPA, 2000). All vegetation associations within the disturbance envelope retain > 95% of their pre-European extent. Development within the disturbance envelope will not significantly reduce the extent of pre-European vegetation associations or increase risk of loss. Vegetation association descriptions are detailed in Table 4 below and shown in Figure 8.

**Table 4: Pre-European vegetation associations**

Vegetation association	Structural description	Floristic description
Coolgardie 9	Woodland Other	Wheatbelt; York gum, salmon gum etc. ( <i>E. loxophleba</i> , <i>E. salmonophloia</i> ). Goldfields; gimlet, redwood etc. ( <i>E. salubris</i> , <i>E. oleosa</i> ). Riverine; rivergum ( <i>E. camaldulensis</i> ). Tropical; messmate, woolybush.

#### 2.3.2.1 Vegetation communities

Vegetation assessments were undertaken via establishment of strategically placed areas to ensure all distinct vegetation communities were characterised. Across all vegetation surveys, four vegetation communities were mapped within the 360 Environmental (2022) survey and also mapped within the Terratree (2021) survey. Vegetation communities within the Project area are described in Table 5 below.

Table 5: Vegetation communities

Survey Area	Name	Landscape position	Community description
360 Environmental (2022)	EsppEiiSaa	Plains, low hills	<i>Eucalyptus salmonophloia</i> mid isolated trees over a mosaic of <i>E. celastroides</i> , <i>E. clelandiorum</i> , and <i>E. torquata</i> low open woodland over <i>Eremophila interstans</i> subsp. <i>interstans</i> ( <i>Eremophila parvifolia</i> subsp. <i>auricampi</i> ) mid isolated shrubs over <i>Senna artemisioides</i> subsp. <i>artemisioides</i> , <i>S. artemisioides</i> subsp. <i>filifolia</i> , and <i>Atriplex vesicaria</i> low open shrubland
	EsEiiAv	Plains	<i>Eucalyptus salmonophloia</i> mid open woodland over <i>Eremophila interstans</i> subsp. <i>interstans</i> ( <i>Eremophila parvifolia</i> subsp. <i>auricampi</i> , <i>Senna artemisioides</i> subsp. <i>filifolia</i> ) tall to mid isolated shrubs over <i>Atriplex vesicaria</i> low open shrubland
	AcEoaDI	Rocky hills	<i>Acacia collegialis</i> ( <i>A. acuminata</i> ) tall shrubland over <i>Eremophila oldfieldii</i> subsp. <i>angustifolia</i> , <i>E. georgei</i> , <i>A. tetragonophylla</i> ( <i>Senna artemisioides</i> subsp. <i>filifolia</i> , <i>Exocarpos aphyllus</i> ) mid shrubland over <i>Dodonea lobulata</i> ( <i>Atriplex vesicaria</i> , <i>Ptilotus obovatus</i> var. <i>obovatus</i> ) low shrubland
	Cleared	Plains	Cleared or historically cleared areas including mine pits and borrow pits (often filled with water), bitumen roads, and dirt tracks. Some of these areas were showing signs of revegetation. With occasional <i>Eucalyptus griffithsii</i> , <i>Atriplex vesicaria</i> , <i>Maireana</i> spp., and assorted weed species
Terratree (2021)	C1	Shallow stony soils, upper slopes	<i>Eucalyptus griffithsii</i> with <i>E. torquata</i>
	C2	Greenstone midslopes	<i>Eucalyptus clelandiorum</i> (Cleland's Blackbutt)
	C3	Drainage lines	<i>Eucalyptus griffithsii</i> ( <i>E. torquata</i> absent)
	C5	Greenstone midslopes, occasionally drainage areas	<i>E. campaspe</i> (Silver-topped gimlet)
	C6	Flats, low lying deep soils	<i>E. Salmonphloia</i> (Salmon gum)



Survey Area	Name	Landscape position	Community description
	C7	Small ironstone mesa	<i>Eremophila oppositifolia</i> (Mesa)
	Degraded	N/A	Cleared areas

### 2.3.2.2 Vegetation Condition

Some areas within the Project area have been subjected to medium to high level disturbances, including historical small and large scale mine excavations, makeshift tracks, cattle grazing, weeds and litter. As such, vegetation condition within the overall survey area was predominantly rated Excellent and ranged to Completely Degraded (where all vegetation had been completely cleared) according to the scale given in Keighery (1994).

As surveyed areas encompassed numerous project areas, the below table presents the vegetation condition areas representative of vegetation within Dreadnought and Alicia clearing envelope area boundary only, as vegetation outside of the boundary will not be affected.

*Table 6: Vegetation condition*

Survey Area	Vegetation Condition	Area (ha)	% of total
360 Environmental (2022)	Excellent	100.61	78.89
	Very Good	15.90	12.47
	Good	6.29	4.93
	Completely Degraded	4.74	3.72
	<b>Total</b>	<b>127.54</b>	<b>100</b>
Terratree (2021)	Very Good	17.63	10.56
	Good	99.70	59.71
	Completely Degraded	49.66	29.74
<b>All</b>	<b>Total</b>	<b>166.98</b>	<b>100</b>

\*Numbers have been rounded to two decimal places for simplicity of data

### 2.3.2.3 Significant vegetation

Desktop searches identified no threatened or priority ecological community within 50 km of the Project area.

The nearest Environmentally Sensitive Area (ESA) is the Rowles Lagoon Conservation Park, located approximately 68km north-west of the Survey Area.

The project area is not located within any listed conservation areas. The nearest conservation area is Kangaroo Hills Timber Reserve, which is situated adjacent to the southernmost section of the survey area, separated by Nepean Road.

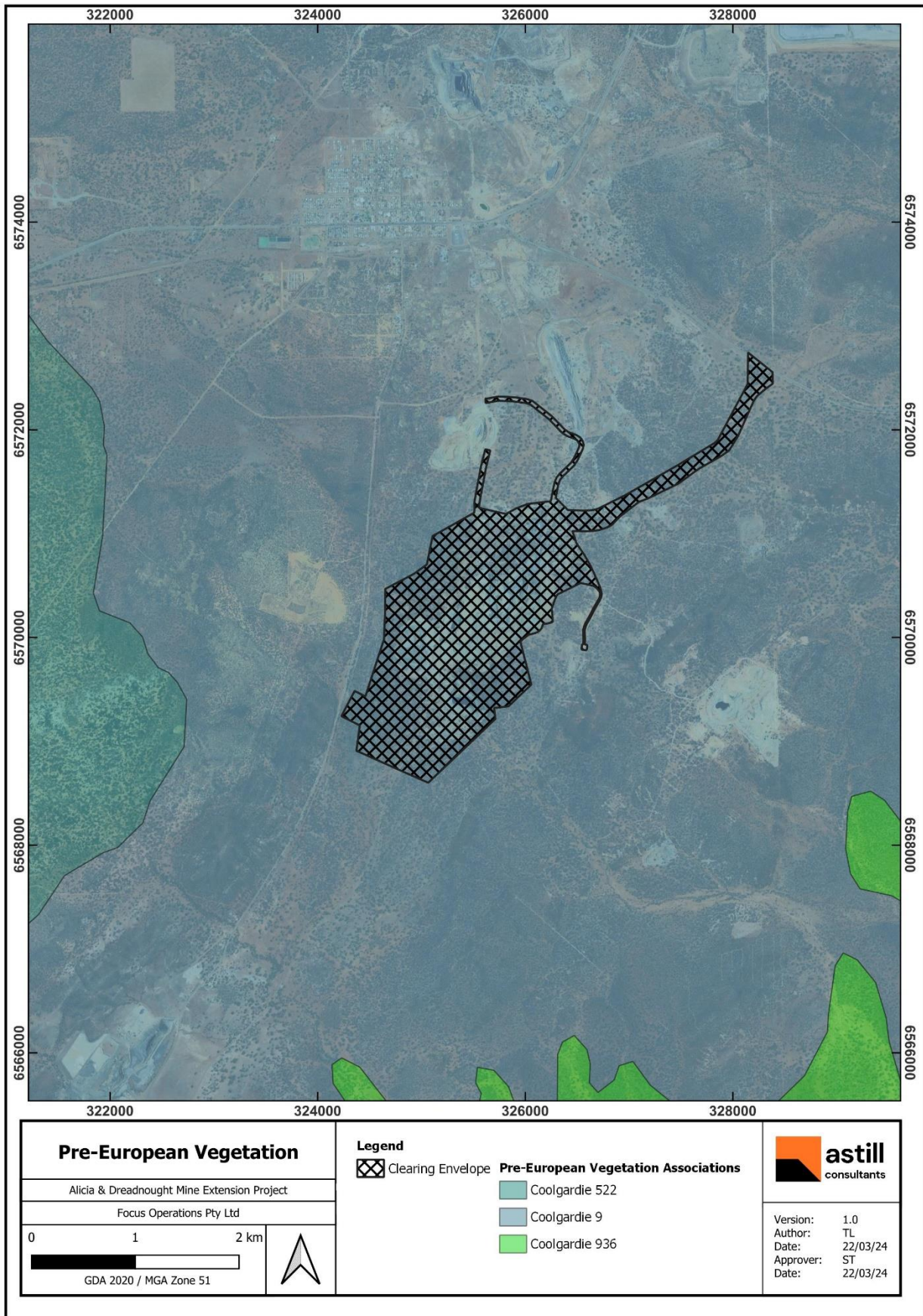


Figure 8: Pre-European vegetation associations

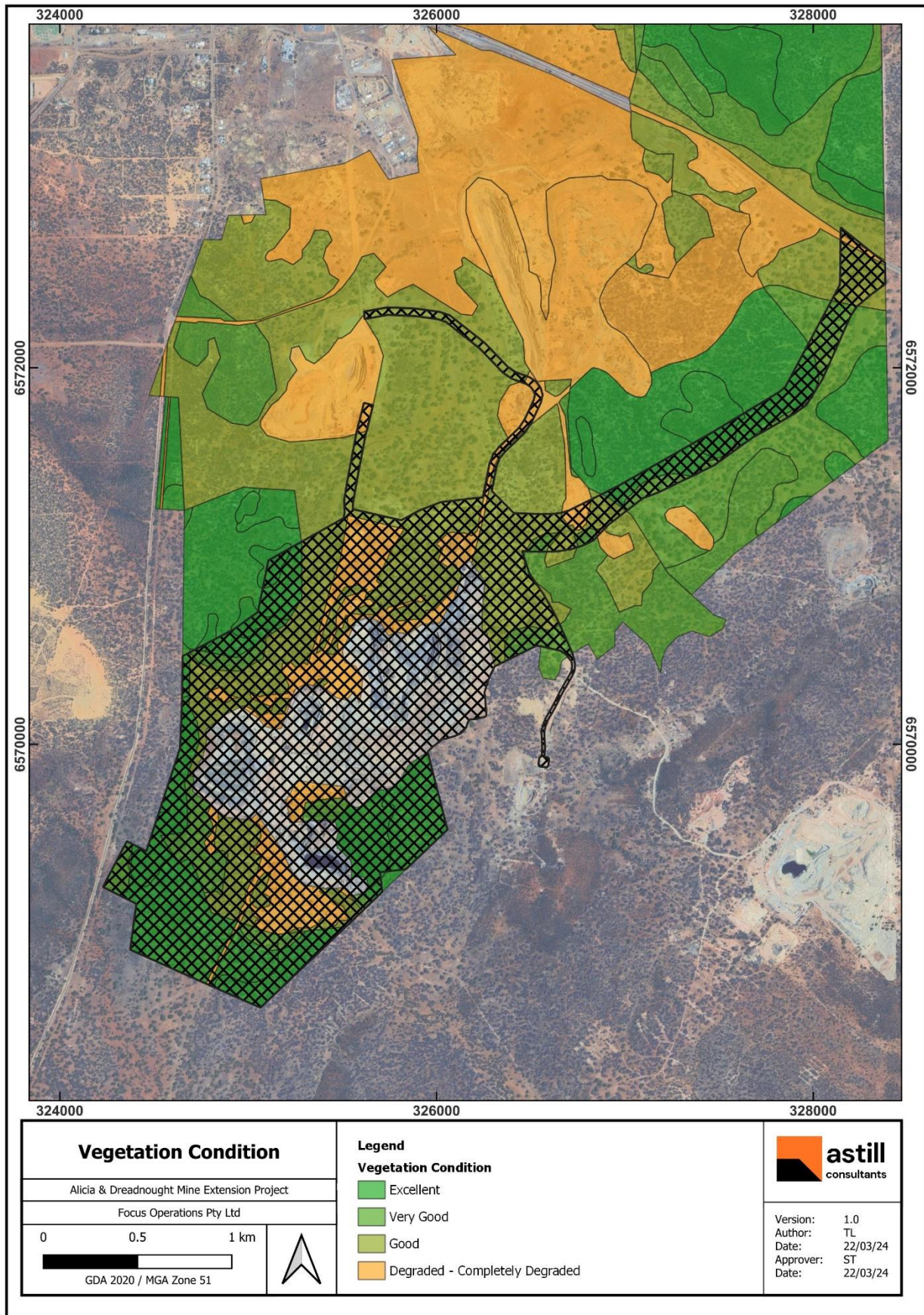


Figure 9: Vegetation condition

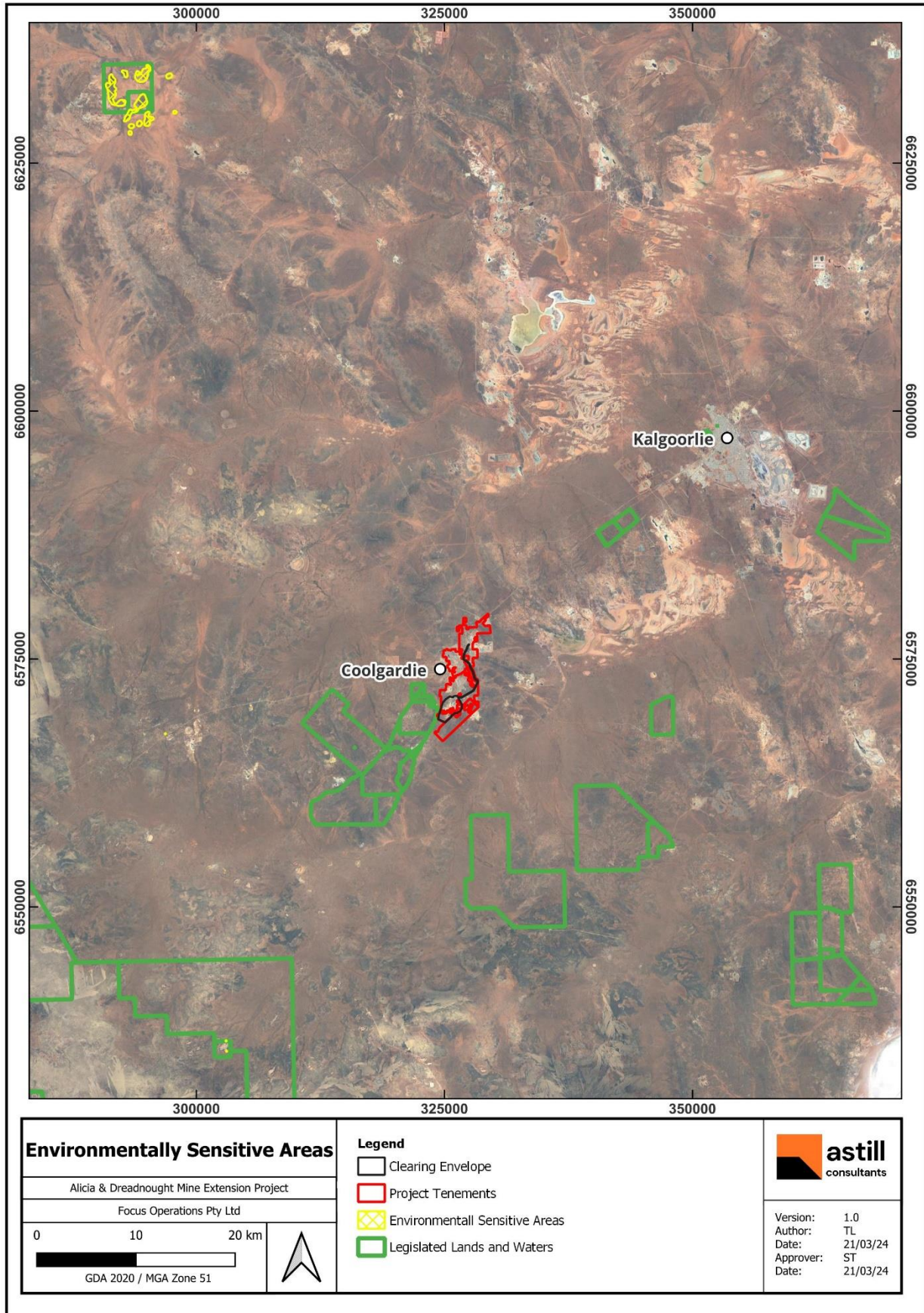


Figure 10: Environmentally sensitive areas

### 2.3.3 Flora

360 Environmental (2022) surveyed a broader area including Bonnievale, Brilliant, CNX, Three Mile Hill, Lady Loch, Perseverance, Dreadnought and Alicia project areas and, accordingly, the larger number of taxa identified (149) includes species from outside the Project area that is the focus of this application. Dominant families included Chenopodiaceae (26 taxa) and Myrtaceae (15 taxa). The most dominant genera were *Eucalyptus* (12 taxa) and *Eremophila* (10 taxa).

Terratree (2021) also surveyed a broader area of the CGO, identifying a total of 95 species across 28 families, with 9 species unable to be identified due to being sterile at time of survey.

The suite of flora taxa recorded during the surveys is considered typical for the area (Beard 1990). A summary of the flora survey is presented in Table 7 below.

**Table 7: Flora abundance**

Survey	Species number (field search)				
	Total	Genera	Families	Unidentified	Dominant families
360 Environmental (2022)*	149	78	35	18	<i>Chenopodiaceae</i> (26 taxa) <i>Myrtaceae</i> (15 taxa)
Terratree (2021)	95	-	28	9	<i>Scrophulariaceae</i> , <i>Chenopodiaceae</i>

\*includes areas outside of the Project area within broader CGO survey area

#### 2.3.3.1 Threatened and Priority Flora

Based on database searches, a total of 90 flora species of conservation significance had possibility of occurring within 50 km of the Project area, comprising of three Threatened taxa, 27 Priority 1, 14 Priority 2, 40 Priority 3, and six Priority 4 species. (360 Environmental, 2022).

Terratree's desktop search of a 20km radius indicated a total of 24 flora species of conservation significance as possibly occurring, comprising one Threatened, ten Priority 1, four Priority 2, seven Priority 3 and two Priority 4 flora species. (Terratree, 2021).

No Threatened (Declared Rare) or Priority Flora or Ecological Communities (TECs or PECs) were recorded during field surveys of the Project area.

Eighteen taxa could not be identified to species level because they were sterile at the time of survey during the 360 Environmental survey, and nine were unable to be identified during Terratree's survey. None of the unknown flora taxa were analogous to Threatened or Priority flora taxa identified by the database searches as likely to occur within the survey area, nor were they representative of flora of other significance.

Following surveys, one Priority 1 species, *Acacia websteri* was recorded in the survey area (360 Environmental, 2022), however it was approximately 7 km north of this project area. Consequently, there is a low risk of Priority flora species being impacted by clearing activities.

### 2.3.3.2 Introduced Flora

A total of three introduced flora species were recorded in the 360 Environmental (2022) survey of Alicia and Dreadnought project areas. A summary of introduced flora identified within the survey area are provided in Table 8 below.

Two Weeds of National Significance (WoNS) were identified in the survey area, but none were found within the project area.

*Table 8: Introduced flora*

Survey Area	Species name	Common name	WoNS
360 Environmental (2022)	<i>Asphodelus fistulosus</i>	Onion Weed	No
	<i>Euphorbia drummondii</i>	Milkweed	No
	<i>Salvia verbenaca</i>	Wild Sage	No
Terratree (2021)	<i>Agave americana</i>	Century plant/Agave/Yucca	No
	<i>Asphodelus fistulosus</i>	Onion Weed	No
	<i>Lycium ferocissimum</i>	African Boxthorn	Yes
	<i>Opuntia stricta</i>	Common Prickly Pear	Yes
	<i>Schinus mole</i>	Peppertree	No

### 2.3.4 Fauna

Fauna surveys over the Project area have included basic fauna assessments (previously known as level 1 fauna assessments), targeted survey for *Camponotus* sp. nr. *terebrans*, and a subterranean fauna desktop review. Fauna surveys have demonstrated that most fauna identified during field observations are common and widespread, with fauna abundance by taxa summarised in Table 9 below.

*Table 9: Fauna abundance*




Survey	Species number (desktop search)	Species number (field search)				
		Total	Amphibians	Birds	Mammals	Reptiles
360 Environmental (2022)*	311	61	0	42	10	9

\*includes areas outside of the Project area within broader CGO survey area

#### 2.3.4.1 Fauna habitat

Broad fauna habitats have been mapped in the Project area and described in each biological survey. Fauna habitats are considered relatively common and representative of the local area and are widespread through the region. Fauna habitats with example images are summarised in Table 10 below.

Table 10: Fauna habitats

Survey	Habitat type	Description	Example image
360 Environmental (2022)	Eucalyptus woodland	Mixed <i>Eucalyptus</i> sp. woodlands over <i>Acacia</i> sp. <i>dodonea</i> sp. <i>Eremophila</i> sp. or <i>Melaleuca</i> sp. mixed shrublands. Peeling bark, woody debris, leaf litter and hollow logs were observed throughout this habitat type. These microhabitat features provide shelter for small reptiles and mammals. The canopy of trees provides shelter and foraging habitat for birds.	
	Rocky slopes	<i>Acacia collegialis</i> ( <i>A. acuminata</i> ) tall shrubland over <i>Eremophila oldfieldii</i> subsp. <i>angustifolia</i> , <i>E. georgei</i> , <i>Acacia tetragonophylla</i> ( <i>Senna artemisioides</i> subsp. <i>filifolia</i> , <i>Exocarpos aphyllus</i> ) mid shrubland over <i>Dodonaea lobulata</i> ( <i>Atriplex vesicaria</i> , <i>Ptilotus obovatus</i> var. <i>obovatus</i> ) low shrubland. Leaf litter, peeling bark, rock crevices, and woody debris provide shelter for small reptiles and mammals. Shrublands provide shelter and foraging habitat for birds, reptiles and mammals.	
	Disturbed areas	Cleared or historically cleared areas including mine pits and borrow pits (often filled with water), bitumen roads, and dirt tracks. .	

2.3.4.2 Significant fauna

Based on combined desktop and field assessments across surveys, an assessment was carried out on likelihood of significant fauna species occurring in the Project area. Evidence of Western Quoll scat was recorded during the survey, and whilst Malleefowl were not recorded during the survey, have been listed as a high likelihood of occurring in the area when considering habitat types noted in the field.

It should be noted that while habitats onsite are considered possibly suitable, some or all may be marginal in extent/quality and therefore fauna species considered as possibly occurring may in fact only visit the area for short periods as infrequent vagrants. A summary of significant fauna likelihood is detailed in Table 11 below.



Table 11: Significant fauna likelihood

Species name	Common name	Conservation status		Assessment	Likelihood
		EPBC Act	BC Act		
<i>Leipoa ocellata</i>	Malleefowl	VU	VU	Recent records within 1km of the survey area. Suitable habitat present, unburned mallee and woodland with abundant litter and low scrub.	High
<i>Apus pacificus</i>	Pacific Swift (Fork-tailed Swift)	MI, MA	IA	Three records within 100km of the survey area. Species may fly over the survey area as it covers a wide range of airspace over varied habitat.	Low
<i>Dasyurus geoffroii fortis</i>	Chuditch	VU	VU	A scat was found within the survey area during the current survey. Identified to be this species. Some suitable habitat present – mallee shrubland.	Recorded
<i>Jalmenus aridus</i>	Inland Hairstreak		P1	Nearest record 19km NE of the survey area. Suitable habitat present within the survey area.	Medium
<i>Ogyris subterrestris petrina</i>	Arid Bronze Azure Butterfly	CR	CR	No recent records. Suitable habitat present, i.e. smooth barked <i>Eucalyptus</i> sp.	Medium
<i>Falco hypoleucos</i>	Grey Falcon	VU	VU	No recent nearby records. Some records within 100km of the survey area. Preferred nesting habitat absent. May use survey area for hunting.	Low
<i>Calyptorhynchus latirostris</i>	Carnaby's Cockatoo	EN	EN	This species was recorded 30km NE of the survey area in Kalgoorlie. However, these records occur well outside the known distribution of the species and likely represent a vagrant occurrence of the taxon.	Low
<i>Thinornis cucullatus</i>	Hooded Plover (Hooded Dotterel)	MA	P4	Closest record 42km NE of the survey area. No suitable habitat within the survey area.	Low
<i>Motacilla cinerea</i>	Grey Wagtail	MI, MA	IA	Survey area is well outside the distribution of this species. Some suitable habitat present in parts, i.e. water bodies.	Low
<i>Pezoporus occidentalis</i>	Night Parrot	EN	CR	No records within 100km of the survey area. No suitable habitat within the survey area.	Low
<i>Actitis hypoleucos</i>	Common Sandpiper	MI, MA	IA	Three recent records within the survey area. Some suitable habitat present, i.e. interior wetlands – narrow muddy edges of billabongs.	Previously recorded
<i>Calidris acuminata</i>	Sharp-tailed Sandpiper	MI, MA	IA	Nearest record 15km NW of the survey area. Suitable habitat present, i.e. water bodies.	Medium
<i>Calidris alba</i>	Sanderling	MI, MA	IA	Nearest record in Kalgoorlie. No suitable habitat within the survey area.	Low

Species name	Common name	Conservation status		Assessment	Likelihood
		EPBC Act	BC Act		
<i>Calidris ferruginea</i>	Curlew Sandpiper	CR, MI, MA	CR, IA	Nearest record 15km NW of survey area. Suitable habitat within the survey area, i.e. around lakes, dams.	Medium
<i>Calidris melanotos</i>	Pectoral Sandpiper	MI, MA	IA	Survey area is well outside the distribution of this species area. Some suitable habitat present in parts, i.e. inland water bodies.	Low
<i>Calidris ruficollis</i>	Red-necked Stint	MI, MA	IA	Nearest record 15km NW of survey area. No suitable habitat within the survey area, i.e. mudflats.	Low
<i>Tringa brevipes</i>	Grey-tailed Tattler	MI, MA	IA, P4	Nearest record 20km NE of survey area. No suitable habitat within the survey area, i.e. coastal.	Low
<i>Tringa glareola</i>	Wood Sandpiper	MI, MA	IA	Nearest record 30km NE of the survey area. Suitable habitat within the survey area, i.e. freshwater wetlands.	Medium
<i>Tringa nebularia</i>	Common Greenshank	MI, MA	IA	Recent record within the survey area. Suitable habitat within the survey areas, i.e. temporary inland wetlands.	Previously recorded
<i>Plegadis falcinellus</i>	Glossy Ibis	MI, MA	IA	Only record 27km NE of the survey area in Kalgoorlie. Some suitable habitat present, i.e. temporary wetlands.	Medium
<i>Myrmecobius fasciatus</i>	Numbat	EN	EN	No nearby records. Some suitable habitat is present, i.e. eucalypts and wandoo woodland. The only natural population exist well outside the survey area in the far north of WA.	Low
<i>Macrotis lagotis</i>	Bilby	VU	VU	No nearby records. No suitable habitat present.	Low

\*Conservation Status: State – Listed under Biodiversity Conservation Act 2016 or Department of Biodiversity, Conservation and Attractions Conservation List, Federal – Listed under Environmental Protection and Biodiversity Conservation Act 1999. CR – Critically Endangered, EN – Endangered, VU – Vulnerable, IA/MI – Migratory, MA – Marine, P – Listed as Priority by DBCA.

### 2.3.4.3 Short Range Endemics

Habitat types in the Project area are regionally common and with a high degree of habitat connectivity, and therefore it is unlikely that any short-range endemic (SRE) species is restricted to the Project area.

### 2.3.4.4 Subterranean fauna

Invertebrate Solutions (2021) undertook a desktop assessment for subterranean fauna (stygofauna and troglifauna) for CGO, including the Project area. A combination of regional information, geological, hydrogeological and database searches were used to inform likelihood of subterranean fauna in the project area. This assessment concluded that there was little habitat for subterranean fauna present due to lack of fracturing in fine-grained geological units (Invertebrate Solutions, 2021).

### 2.3.4.5 Introduced fauna

Introduced fauna are widely established within the regional area. A total of seven introduced fauna species were recorded within the 360 Environmental (2022) survey area. A summary of introduced fauna is in Table 12 below.

Table 12: Introduced fauna

Survey Area	Species Name	Common Name
360 Environmental (2022)	<i>Capra hircus</i>	Goat
	<i>Bos primigenius taurus</i>	European Cattle
	<i>Canis familiaris</i>	Dog
	<i>Vulpes vulpes</i>	Red fox
	<i>Equus caballus</i>	Horse
	<i>Felis catus</i>	Cat
	<i>Oryctolagus cuniculus</i>	Rabbit

## 2.4 Hydrology

The project area lies close to the top of a series of catchments that drain north, east and south. Though catchments are relatively small, stormwater flows are large enough to require management of interaction with site infrastructure, including roads. Drainage lines and flow paths crossing roads and stormwater across site generally can be managed using floodways and/or culverts.

Significant water bodies in the regional vicinity of the project include Brown Lake (13 km northeast), Red Lake (20 km northeast), White Flag Lake (37 km northeast) and Lake Douglas (26 km northeast). Clearing within watercourses is likely to have minor impacts to these ephemeral drainage lines. Drainage diversion infrastructure will be installed to ensure that flood risks to the Project are mitigated whilst preserving natural flow paths.

## 2.5 Hydrogeology

The greenstone rocks in the Coolgardie area are described as generally hosting local aquifers containing saline to hypersaline groundwater (Kern, 1995). Groundwater storage is limited to secondary porosity present in discrete, local-scale fractures. Based on limited interconnectivity of the aquifers, recharge is likely to be local (Kern, 1995).

Groundwater levels in the project area are highly variable, ranging from 5 to 35 metres, and TDS ranges between 30,000 to 151,000 mg / L, which is considered hypersaline. Groundwater has limited use outside of mining and negligible hydrogeological impacts are anticipated to occur from clearing activities.

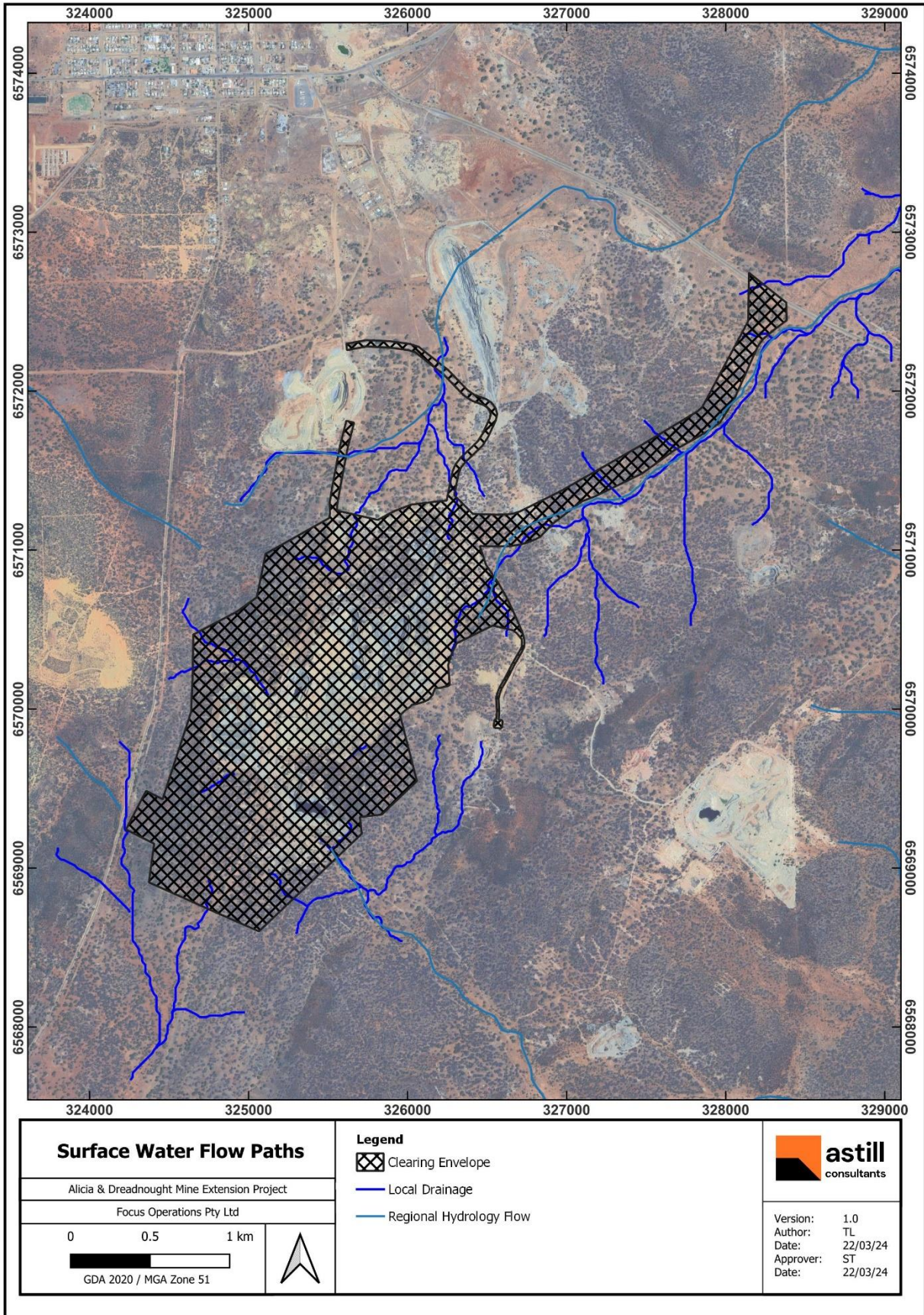


Figure 11: Surface water flows

## 2.6 Heritage

### 2.6.1 Native Title

There is no Native Title Determination across the Project area.

There is one registered Native Title claim over the Project area, Marlinyu Ghoorlie Claim (WC2017/007). Focus is currently negotiating an agreement with the Marlinyu Ghoorlie Native Title Claimant group.

### 2.6.2 Aboriginal Heritage

A search of DPLH Aboriginal Cultural Heritage Inquiry System (ACHIS) in November 2023 identified that one (1) Registered Aboriginal Sites interacts with the disturbance envelope, two (2) Lodged places, and one other Lodged place lies adjacent, but not within the clearing envelope.

The Registered site is listed as Tjunti-Nya (ID 3008). An additional two Lodged places called NCA-02 (ID 39399) and NCA-03 (ID 39398) interact with the disturbance envelope but are not registered sites. Lodged site MG2206-NCA-01 (ID 39400) lies adjacent the clearing envelope boundary. It is important to note that these sites have 2 km by 2 km buffers shown on ACHIS around the specific site locations to protect their whereabouts. Several other Aboriginal Sites surround disturbance envelope within a 5 km radius around the Coolgardie townsite. The location of Aboriginal Site DPLH boundaries is shown in Figure 23.

Tjunti-Nya is listed with the types: ceremonial, mythological, rockshelter, and other, with female access only. The specific location of this site is confidential, however based on signed statements to Focus provided by relevant knowledge holders, as well as information provided by DPLH, the location is over 600 m west of the disturbance envelope on the adjacent side of Nepean Road.

Lodged place NCA-02 is listed as a potential burial site and correlates to small area located approximately 1 km north of the disturbance envelope.

Lodged place NCA-03 is listed with the types of skeletal material / burial and correlates to small area located approximately 500 m north of the disturbance envelope.

Based on the above information, and confidential surveys and correspondence maintained by Focus, it is determined that the disturbance envelope will not interact with any of these Aboriginal heritage sites and mining activities will not impact on heritage values.

Focus continues to maintain engagement with traditional owners and Native Title claimants on a regular basis, with intent to foster a robust relationship built on mutual respect and understanding for both parties to continue to work together alongside mining operations.

### 2.6.3 European Heritage

A search of State Heritage Office inHerit database in January 2024 showed no Statutory Heritage Listings in vicinity of the Project.

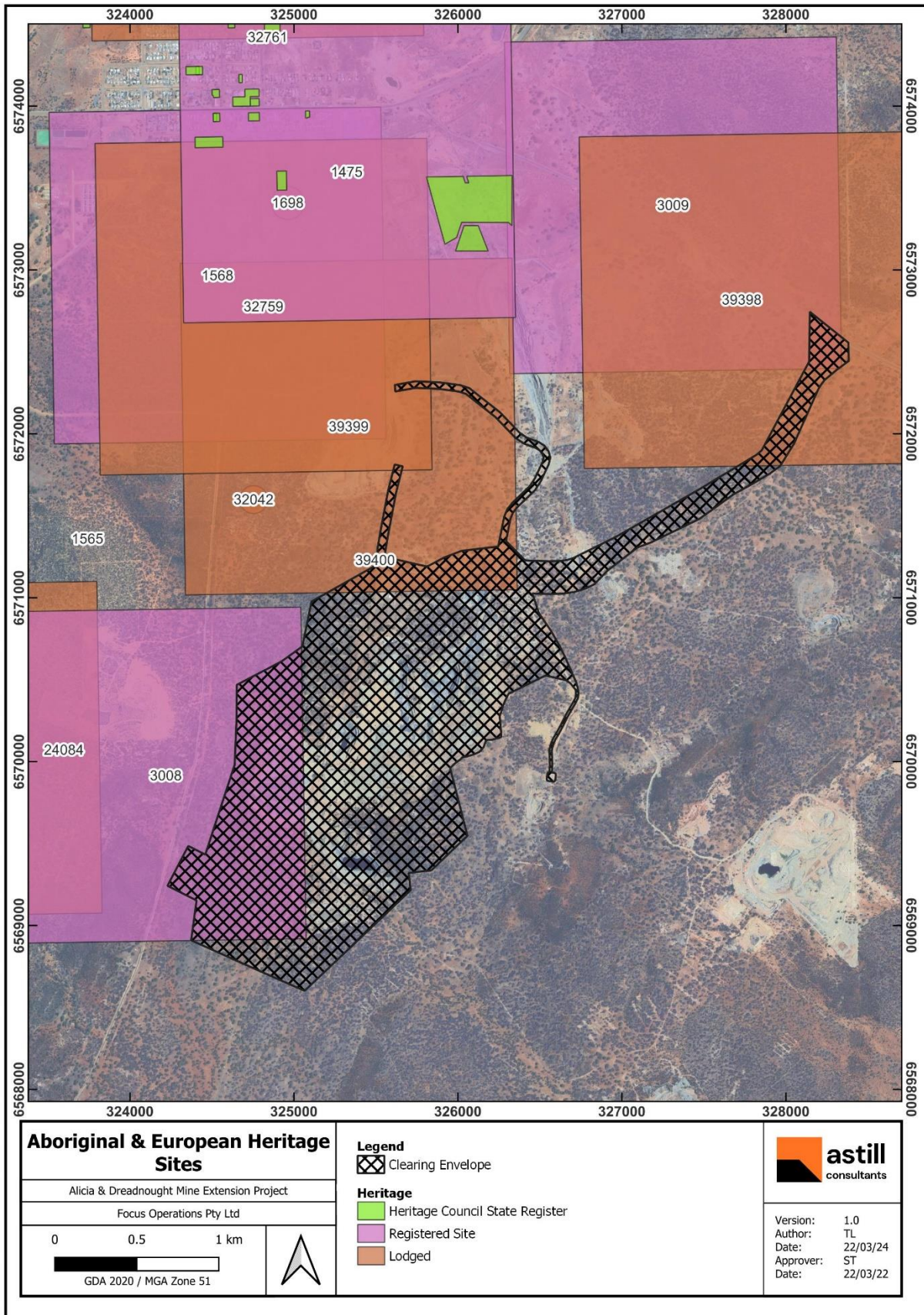


Figure 12: Heritage sites

### 3. Assessment Against Clearing Principles

An assessment against each of the ten clearing principles as defined under Schedule 5 of the EP Act demonstrates that the proposed clearing is unlikely to be at variance with any of principles as outlined in Table 13 below.

Table 13: Clearing principles assessment

Clearing principle	Assessment	Outcome
a) Native vegetation should not be cleared if it comprises a high level of biological diversity.	The Eastern Goldfields subregion is rich and diverse in its flora; however, most species (excluding Priority species) are wide ranging and usually occur in at least one, and often several, adjoining subregions (Cowan, 2001). The Project area is not considered to comprise a high level of biological diversity as vegetation is typical of the surrounding region. The vegetation within the Project area has been impacted by historical and recent disturbances, reducing vegetation quality.	Unlikely to be at variance to this principle.
b) Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia.	Conservation significant species considered to be potentially present in the area include Malleefowl and Western Quoll. No active or inactive nests were identified within the Project area, and one Western Quoll scat was identified during a fauna survey. Both species have a wide range, and habitat present is analogous to the surrounding area and is not considered to be significant for this species,	Unlikely to be at variance to this principle.
c) Native vegetation should not be cleared if it includes or is necessary for the continued existence of rare flora.	No Threatened (Declared Rare) or Priority flora species were recorded in the Project area during any of the vegetation and flora surveys. Following surveys, one Priority 1 species, <i>Acacia websteri</i> was identified approximately 7km from the project area, but will not be impacted by this project.	Unlikely to be at variance to this principle
d) Native vegetation should not be cleared if it comprises the whole or a part of or is necessary for the maintenance of a threatened ecological community.	There are no known TECs or PECs located within a 50 km radius of the Project area. No vegetation analogous to TECs or PECs were recorded in any of the vegetation and flora surveys.	Not at variance to this principle
e) Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared	The Project area includes pre-European vegetation association Coolgardie 9 with remaining extents of 97.78% remaining across the Coolgardie Bioregion. The clearing represents a minor portion of vegetation in an area well connected to surrounding vegetation.	Not at variance to this principle
f) Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.	There are no permanent watercourses or wetlands in the Project area. Minor ephemeral surface water flow paths exist through the Project area, however vegetation associated with these are not distinct to these areas and are not considered riparian vegetation.	Unlikely to be at variance to this principle

<p>g) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.</p>	<p>The disturbance envelope contains a significant proportion of historic mining disturbance and newer exploration disturbance, and following completion of the Project activities will be rehabilitated in accordance with an approved MCP.</p>	<p>Unlikely to be at variance to this principle</p>
<p>h) Native vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area.</p>	<p>There are no conservation areas or DBCA-managed lands in the Project area. The nearest ESA is Rowles Lagoon, located approximately 68 km northwest, and the nearest conservation area is Kangaroo Hills Timber Reserve, located adjacent to the project, but not within the boundary.</p>	<p>Not at variance to this principle.</p>
<p>i) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.</p>	<p>There are no permanent surface water features in the Project area. Groundwater in the region is hypersaline and has limited uses outside of the mining industry. Groundwater recharge is slow and will not be impacted by clearing activities.</p>	<p>Unlikely to be at variance to this principle</p>
<p>j) Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.</p>	<p>The climate is semi-arid with an average annual rainfall under 300 mm. Catchment areas are small and defined by hills to the south and north of the Project area. Ephemeral drainage lines in the Project area are likely to only flow as shallow overland flow. Drainage diversion infrastructure will be installed to ensure that flood risks to the Project are mitigated whilst preserving natural surface water flow paths.</p>	<p>Unlikely to be at variance to this principle</p>



## 4. Clearing Process

Vegetation will be cleared by mechanical clearing. Clearing areas will be kept to the minimum required for mine activities and undertaken progressively as required. Existing disturbances will be utilised where possible.

### 4.1 Equipment

Equipment required to undertake and support clearing activities may include a combination of:

- Dozer;
- Loader;
- Excavator;
- Water Cart; and
- Service Vehicles.

### 4.2 Methodology

Prior to any clearing, a surface disturbance permit (FML-ENV-FORM-02) will be authorised by Focus' environmental department to ensure clearing is able to be undertaken under a clearing permit or valid clearing exemption (i.e., Regulation 20 of the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004*).

Proposed clearing will be demarcated by a surveyor using high visibility tape / survey pegs to ensure clear visual boundaries for operators prior to clearing commencement or alternatively a spotter with handheld GPS will guide clearing. A toolbox meeting will be held between the supervisor and clearing operator to ensure awareness of clearing areas and any areas to be avoided.

Where practicable raised blade clearing will be used. Where this is not practicable, topsoil will be stripped to 200 mm depth and stockpiled for use in rehabilitation, along with removed vegetation. Once clearing has been completed, surveyors will complete a pickup of cleared areas and provide the data to the environmental department for their records and external reporting obligations.

### 4.3 Rehabilitation

Rehabilitation of cleared areas will occur in accordance with the CGO Mine Closure Plan (MCP) which is being revised to include the Project and will be submitted by June 2024, with the Mining Proposal submitted to DEMIRS in tandem with this application.

## 5. Environmental Management

An Environmental Management Plan (EMP) for CGO was updated in May 2023. This updated EMP outlines the Environmental Management System (EMS) and management strategies and procedures for key environmental areas including those that related to clearing activities (i.e., air quality, fauna, land and soils, vegetation, and weeds). Applicable management measures are summarised below.

### 5.1 Air quality

Dust is generated from clearing activities, topsoil stripping and spreading. Excessive dust can increase local particulate levels, impacting surrounding vegetation and sensitive receptors.

The following management measures will be implemented to mitigate air quality impacts:

- Weather conditions are monitored, and dust impacts are assessed during clearing;
- Topsoil stripping and spreading activities will be restricted if dust cannot be adequately controlled during periods of high winds; and
- Water carts are available and utilised for wetting down of soils as required.

### 5.2 Land and soils

Land and soils may be impacted by clearing activities including minor hydrocarbon spills and poor topsoil stripping and handling practises. These impacts may have long term effects on rehabilitation performance.

The following management measures will be implemented to conserve land and soil resources:

- Regular inspections and maintenance of machinery including daily pre-starts;
- Spill kits closely available during clearing activities;
- Stripping topsoil to a maximum depth of up to 200 mm;
- Topsoil stripping to be undertaken as close as possible to commencement of activities; and
- Soils to be paddock-dumped into stockpiles of no greater than 2 m in height and have adequate distance between them to create a series of mounds and troughs.

### 5.3 Fauna

Fauna impacts (vehicle strike) during clearing activities may result in injury or death of native fauna or livestock. Whilst not all incidents are avoidable, impacts can be minimised.

The following management measures will be implemented to reduce the risk to fauna:

- Speed limits will be signed and enforced;
- Any injury or death of fauna will be recorded and investigated;
- Access to food wastes will be minimised by ensuring effective storage and disposal; and
- Personnel are prohibited from direct contact with fauna, including feeding.

## 5.4 Vegetation

Vegetation clearing can be minimised through design controls and ensuring that clearing only occurs as required.

The following management measures will be implemented to minimise vegetation clearing:

- Utilising existing disturbances where possible for mine infrastructure;
- Choosing paths of least resistance through vegetation when siting roads and other linear infrastructure (where practicable); and
- Retention of canopy trees where possible.

## 5.5 Weeds

Activities which disturb land and soils including clearing have the potential to create favourable conditions for weed infestation. Weeds can be difficult to eradicate once introduced and prevention of weed infestation has long term benefits for rehabilitation outcomes.

The following management measures will be implemented to manage weed impacts:

- All vehicles and equipment arriving on site will be free of soil, seeds, and vegetative matter;
- Movement of vehicles and equipment will be restricted to areas to be cleared; and
- Weed spray programs may be implemented on a seasonal basis to eradicate identified weed infestations.

## 6. References

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- Terratree (2021). Targeted Flora Search for Acacia websteri (Priority 1). Prepared for Focus Minerals August 2021.
- Western Ecological (2023a). Coolgardie Gold Project Basic Terrestrial Fauna Survey Report. Prepared for Focus Minerals Ltd May 2023.

## 7. Appendices

### Appendix A: Proof of ownership

### Appendix B: Biological surveys

1. Coolgardie *Camponotus* sp. nr. *terebrans* Targeted Survey (360 Environmental, May 2022)
2. CNX Three Mile Hill – Coolgardie Gold Project Biological Surveys (360 Environmental 2022)
3. Targeted Flora and Vegetation Survey – Coolgardie Gold Project (Terratree, 2021)
4. Targeted Flora Search for *Acacia websteri* (Priority 1) (Terratree, 2021)
5. CGP Basic Terrestrial Fauna Survey Report (Western Ecological 2023a)

## **Appendix A: Proof of ownership**

## Appendix B: Biological surveys