12 March 2025

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Mineral House
100 Plain Street
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RE: Amendment to Native Vegetation Clearing Permit 10572/1

Focus Operations Pty Ltd (Focus), a wholly owned subsidiary of Focus Minerals Ltd, is seeking to amend existing clearing permit 10572/1 to remove Condition 10, which relates to fauna management for Chuditch (*Dasyurus geoffroii*) at Dreadnought and Alicia project areas.

This request is based on updated ecological assessments indicating that the project area lies significantly outside the currently confirmed distribution of the Chuditch, making its occurrence in the area highly unlikely. SLR Consulting Australia (SLR, formerly 360 Environmental Pty Ltd) reviewed recent distribution mapping, confirming that the species is not expected within the project boundaries. Initial identification of Chuditch scat was based on visual assessment and distribution mapping; however, definitive identification requires genetic testing, which was not undertaken at the time and is no longer possible. SLR concluded that, on balance of probabilities, Chuditch does not occur within the survey area and that approval conditions related to the Chuditch have little basis and would serve no useful purpose.

Additionally, a targeted pre-clearance survey conducted by Terrestrial Ecosystems in November 2024 at the Alicia project area concluded that the presence of Chuditch in the area is unlikely, again given that the nearest confirmed habitat is approximately 100 km away. Based on these findings, Focus considers Condition 10 is now an unnecessary regulatory burden, as it lacks an ecological basis and does not provide meaningful environmental protection in this context.

For your consideration, we have included the following supporting documents:

- A completed application to amend a clearing permit (Form C4);
- A supporting letter from SLR revising its findings regarding the Chuditch in the 2021 environmental report; and
- A 2024 pre-clearance inspection report for the Alicia project area by Terrestrial Ecosystems.

Should you require any further information, please do not hesitate to contact me at 0427 618 533 or via email at gblick@focusminerals.com.au.

[redacted]

SLR Consulting Australia
Level 1, 500 Hay Street, Subiaco WA 6008, Australia

14 November 2024

[redacted]

Focus Minerals Limited
Level 5, 8 St Georges Terrace
Perth WA 6000

RE: Coolgardie Gold Project Biological Survey - 360 Environmental 2021

[redacted]

360 Environmental Pty Ltd (now SLR Consulting Australia (SLR)) was commissioned by Focus Minerals Limited (FML) to undertake a biological survey to support the environmental approval process for an expansion of FML's Coolgardie operations in 2021. During this survey, 360 personnel observed what they considered to potentially be a Chuditch (*Dasyurus geoffroii*) scat. We understand that, based on the report's finding, the Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) imposed conditions related to the Chuditch.

SLR notes that at the time the 360 Environmental report was written, the Species Profile and Threats Database indicated that the species or species habitat may occur within the survey area. This combined with the scat informed the conclusions made in the report. We note that scat identification cannot be definitive without genetic testing. Such testing would have provided clarity regarding whether the scat was from a Chuditch. Unfortunately, genetic testing was outside the scope of our works and the scat has not been retained and thus cannot be tested now.

In response to your query SLR reviewed the 2021 360 Environmental report findings, including the information on the scat in question, and considered the most up-to-date distribution maps from Strahan's Mammals of Australia (Baker & Gynther, 2023). As noted above scat identification cannot be definitive without genetic testing and the distribution maps indicate that the survey area is outside the currently known distribution of the Chuditch. SLR therefore considers that, on the balance of probabilities, Chuditch does not occur within the survey area and we therefore believe that the approval conditions related to the Chuditch have little basis and would serve no useful purpose.

Regards,

SLR Consulting Australia

[redacted]

TERRESTRIAL ECOSYSTEMS

Ref: 2025-0019-002-st V2

6 February 2025

[redacted]

Re: Pre-clearance inspection for the Alicia project area

[redacted]

Terrestrial Ecosystems is pleased to provide a report on its targeted pre-clearance survey of ~18.2ha of habitat in the Alicia project area (i.e., project area; Figure 1). This assessment was completed to satisfy the conditions of Clearing Permit 10572/1, listed below.

Clearing permit 10572/1:

9. Fauna management – Malleefowl

Where clearing authorised under this Permit is to occur between 1 September and 31 January, the Permit Holder shall:

a) Within two weeks prior to undertaking any clearing, engage an *environmental specialist* to conduct an inspection of the area to be cleared to identify *active (in use) Malleefowl (Leipoa ocellata) mounds*.
b) Where an *active (in use) Malleefowl mound* is identified under Condition 9(a) of this Permit, the Permit Holder shall ensure that no clearing occurs within 200 metres of the mound, during the months of September through to January, unless first approved by the CEO.

10. Fauna management - Chuditch

a) Within two weeks prior to undertaking any clearing authorised under this Permit, the Permit Holder shall engage a *fauna specialist* to undertake clearance surveys for chuditch (*Dasyurus geoffroi*).
b) Where chuditch dens are identified under Condition 10(a), the Permit Holder shall engage a *fauna specialist* to determine if the den is occupied.
c) Within two weeks prior to undertaking any clearing authorised under this Permit, the Permit Holder shall engage a fauna specialist to relocate any Chuditch found under Condition 10(a) and 10(b) of this permit.
d) The Permit Holder shall engage a fauna spotter to traverse the project area ahead of machinery, at the time of clearing and alert machinery operators to avoid injury or mortality to Chuditch or other fauna gazetted within the Wildlife Conservation (Specially Protected Fauna) Notice.
e) Where any chuditch are identified and relocated under Condition 10(a), 10(b), 10(c) and 10(d) of this Permit, the Permit Holder shall include the following in a report submitted to the *CEO*: :

    i. the location of any evidence of chuditch recorded using a Global Positioning System (GPS) unit set to Geocentric Datum Australia 1994 (GDA94), expressing the geographical coordinates in Eastings and Northings or decimal degrees;
    ii. the type of evidence recorded under Condition 10(e)(i) e.g. fauna individuals, burrows, scats, tracks;
    iii. the location and date where any chuditch were relocated using a Global Positioning System (GPS) unit set to Geocentric Datum Australia 1994 (GDA94),

expressing the geographical coordinates in Eastings and Northings or decimal degrees;

iv. the name of the *fauna specialist* that relocated the chuditch under Condition 10(c); and

v. a copy of the fauna licence authorising the relocation of the chuditch under Condition 10(c).

Figure 1. Survey area with search area

Terrestrial Ecosystems' staff have completed numerous pre-clearance inspections, fauna surveys, and fauna assessments in the region and are familiar with the habitats and fauna expected in the project area.

Malleefowl (*Leipoa ocellata*)

Malleefowl is listed as Vulnerable under the *Environment Protection and Biodiversity Conservation Act 1999* (*EPBC Act 1999*) and *Biodiversity Conservation Act 2016* (*BC Act 2016*).

Malleefowl are large, ground-dwelling birds that rarely fly unless alarmed or are perching for the night. Historically, Malleefowl have been found in mallee regions of southern Australia from approximately the 26th parallel of latitude southwards. Before vegetation clearing for agriculture, Malleefowl were abundant in the WA Wheatbelt and many areas to the east. Vegetation clearing for agriculture also opened adjacent bushland to predators, and in the southwest of WA, Malleefowl often now only persist in isolated remnant patches of native vegetation, particularly in the Goldfields.

Malleefowl build distinctive nests that comprise a large mound of soil/rock covering a central core of leaf litter. These nest mounds range in diameter but span more than five metres and may be up to one metre high. Malleefowl are generally monogamous, and once breeding commences, they pair for life. The terrestrial activity of Malleefowl and building their mounds on the ground means that the birds, their eggs, and newly hatched chicks are vulnerable to foxes, cats, and raptors (Benshemesh, 2007; Benshemesh & Burton, 1999; Lewis & Hines, 2014; Priddel & Wheeler, 1990) The presence of active or recently active nest mounds provides a good indication of the presence of Malleefowl in an area.

The preferred habitat for Malleefowl is shrubs and thickets of mallee *Eucalyptus* spp., *Melaleuca lanceolata*, *Acacia linophylla*, and any other dense litter-forming shrublands, however, they are also found in a diverse range of habitat types {Johnstone, 1998 #6782}.

The National Recovery Plan for Malleefowl (Benshemesh, 2007) lists vegetation clearing, habitat fragmentation and isolation, sheep grazing, predation by foxes, and, to a lesser extent, cats, raptors, wild dogs, bushfires, and climate change as the primary threats to the survival of this species. Conservation and preservation strategies are focussed on habitat protection, in particular, the use of conservation reserves (e.g. Australian Wildlife Conservancy's reserve at Mt Gibson, and Bush Heritages reserves at Eurardy and Charles Darwin), improved fire management, fencing to contain sheep or exclude them from remnant vegetation in agricultural lands, habitat regeneration and improved connectivity, reducing goats and predator control (Benshemesh, 2007).

The potential presence of Malleefowl in mining, exploration, or infrastructure areas requires that the company manage threats to avoid, minimise, and mitigate potential impacts. This bird has been recorded in the adjacent areas and broader region, however, there are no known records in the project area.

Chuditch (*Dasyurus geoffroii*)

Chuditch is listed as Vulnerable under the *EPBC Act and BC Act*.

The Chuditch is the largest extant carnivorous marsupial in WA. It is usually active from dusk to dawn. Formally known from over 70% of Australia, the Chuditch now has a patchy distribution throughout the Jarrah forest and mixed Karri/Marri/Jarrah forest of southwest WA and other isolated areas. Chuditch are solitary animals for most of their life and den in hollow logs, burrows, culverts, etc. They have also been recorded in tree hollows and rock cavities. Chuditch are opportunistic feeders and forage primarily on the ground at night. Their diet can include other mammals, birds, lizards, and bird and reptile eggs, but the majority is a mixture of large invertebrates (e.g. spiders, scorpions and crickets).

There are no recent records of Chuditch east of the Boorabbin sandplain, so it is unlikely to be present around Coolgardie or in the project area.

Survey methodology

Dr Scott Thompson (Terrestrial Ecosystems Principal Zoologist) completed a site inspection and assessment on 21 November 2024 and 5 February 2025 with the assistance of William Price from Focus Mineral Ltd. The site assessment was conducted using foot transects, and the openness of the habitat determined the density of searches. Plates 1-12 show the variations in habitat type and quality across the site. In addition, five Reconyx Hyperfire 2 camera traps were set out with non-reward lures. The camera traps were set between 21-25 November 2024.

If Malleefowl mounds were located, the Terrestrial Ecosystems zoologist would collect data consistent with the National Malleefowl Monitoring System. At each known location, the mound would be classified on a 6-point rating as follows:

1. Typical crater with raised rim – this is a typical shape of an inactive mound, and it can be open or closed;
2. Mound fully dugout – the characteristic of this profile is that the crater slopes down steeply and at the base, the sides drop vertically to form a box-like structure with side usually 20-30 cm deep. Often litter may have been raked into windrows and may have started to enter the mound;
3. Mound with litter – this is the next stage after profile 2. Litter will have been raked into the mound by Malleefowl and thick layers of litter are evident on the surface. There may or may not be sand mixed with the litter at this stage;
4. Mound mounded up but no crater – this is the typical profile of an active by unopened mound;
5. Mound forms a sandy crater with peak in the centre – this is a profile of an active mound that is in the process of being closed by the Malleefowl; and
6. Mound low and flat without a peak or crater.

In addition to the mound profile rating, details regarding the dimensions and status of each mound would be recorded. Any mounds would be photographed, and the surrounding area would be searched for evidence of activity and use (e.g., scats, footprints, feathers, eggshells, goanna diggings, litter raked, etc.). This search would be conducted within a 25m radius of any mound.

If Malleefowl mounds were found, then Terrestrial Ecosystems' zoologist would place two sticks in an 'X' on top of each recently active mound. These sticks can be used on subsequent visits to determine whether there has been any activity at the mound.

Results

The project area habitat was open with good visibility (Plates 1-12). No Malleefowl tracks or mounds were recorded, and there was no evidence of Chuditch activity in the area. No Chuditch or Malleefowl were recorded on the camera traps.

Some of the project area has recently been cleared for exploration activity. A few fallen trees, stumps, piles of trees, and woody debris were present, but there were no good-quality woodland areas.

Discussion

No vertebrate fauna of conservation significance, no confirmed Chuditch denning sites and no Malleefowl mounds were recorded. Fallen trees and logs cleared during earlier vegetation clearing programs can provide temporary denning habitat for Chuditch, however, the habitat is disturbed so is not likely to be core habitat for Chuditch or Malleefowl.

As with all mining and exploration activities, Terrestrial Ecosystems encourages minimising vegetation clearing where possible so that development does not leave fragmented areas that can reduce habitat connectivity.

Please do not hesitate to contact the undersigned (0407 385 239) if you require any further information.

References

Benshemesh, J. (2007). *National Recovery Plan for Malleefowl*. D. f. E. a. Heritage.

Benshemesh, J., & Burton, P. (1999). *Fox predation on Malleefowl three years after the spread of RCD in Victoria*.

Johnstone, R. E., & Storr, G. M. (1998). *Handbook of Western Australian Birds. Volume I - Non-Passerines (Emu to Dollarbird)*. Western Australian Museum.

Lewis, M., & Hines, M. (2014). *Malleefowl activity at nesting sites increase fox and other feral animal visitation rates* Proceedings of the 5th National Malleefowl Forum 2014,

Priddel, D., & Wheeler, R. (1990). Survival of Malleefowl *Leipoa ocellata* chicks in the absence of ground-dwelling predators. *Emu, 90*, 81-87.

Plate 1. Project area habitat

Plate 2. Project area habitat

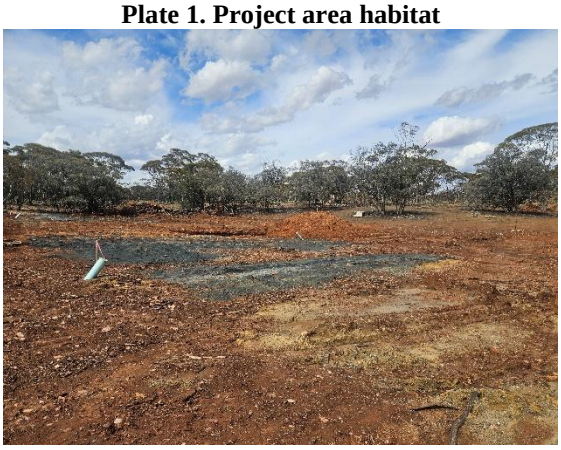

Plate 3. Project area habitat

Plate 4. Project area habitat

Plate 5. Project area habitat

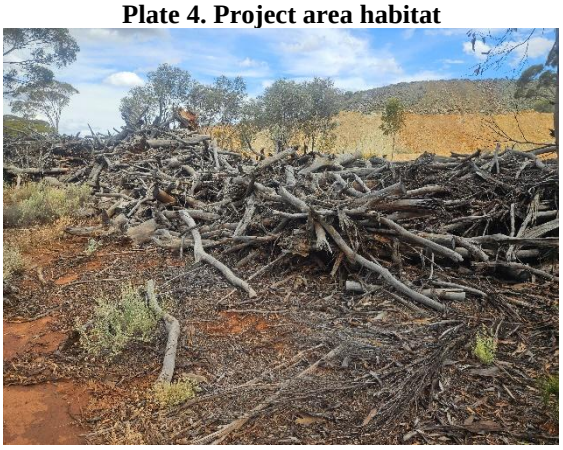

Plate 6. Project area habitat

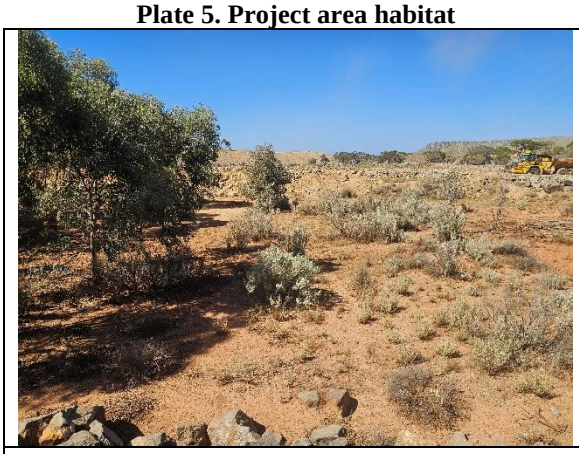

Plate 7. Project area habitat

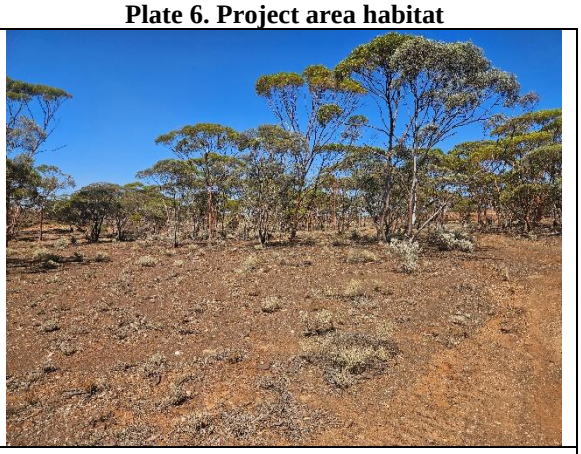

Plate 8. Project area habitat

	
Plate 9. Project area habitat	**Plate 10. Project area habitat**
	
Plate 11. Project area habitat	**Plate 12. Project area habitat**

Disclaimer

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