SHIRE OF MENZIES

Mt Ida Road Diversion -

Native Vegetation Clearing Permit Application: Supporting Document

220057-MIG-MTIDA-NVCP
Rev: 0
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DELTA LITHIUM

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Acronyms

Term	Meaning
BC Act	Western Australian Biodiversity Conservation Act 2016
CAM	Central Amphibolite
CGR	Copperfield Granite
BoM	Bureau of Meteorology
DAM	Dick Amphibolite
DBCA	Department of Biodiversity, Conservation and Attractions
DLI	Delta Lithium Limited
DWER	Department of Water and Environment Regulation
DEMIRS	Department of Energy, Mines, Industry Resources and Safety
DPIRD	Department of Primary Industries and Regional Development
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
ha	Hectare
IBRA	Interim Biogeographic Regionalisation for Australia
Km	Kilometres
MAN	Anorthosite
MCP	Mine Closure Plan
MIG	Mt. Ida Gold Pty Ltd
MUR	Murchison Bioregion
MUR01	Eastern Murchison Subregion
NVCP	Native Vegetation Clearing Permit
PEC	Priority Ecological Community
PMST	Protected Matters Search Tool
Project	Mt. Ida Lithium Project
RDM	Red Dirt Metals Limited
ROM Pad	Run of Mine Pad
SDP	Surface Disturbing Permit
TAM	Timoni Amphibolite
TEC	Threatened Ecological Community
UUM	Unexpected Ultramafic
WRL	Waste Rock Landform

1 Introduction

The Mt Ida Road Diversion is being developed by Mt Ida Gold Pty Ltd (MIG) a wholly owned subsidiary of Delta Lithium Limited (DLI or Delta Lithium) (fomally Red Dirt Metals Limited) on behalf of the Shire of Menzies (Shire). The Mt Ida Lithium Project (the Project) is being developed by MIG and requires a realignment of a portion of the Mt Ida and Sandstone roads outside of the planned mining area. The road diversion shall ensure public safety through the avoidance of any potential risks associated with mining activities.

The Mt Ida Road Diversion is located approximately 100km northwest of Menzies, in the Murchison Region (MUR) of Western Australia (Figure 1-1).

Green Values Australia (Green Values) was commissioned by MIG (on behalf of the Shire) to prepare an application under Part V of the *Environmental Protection Act 1986* (EP Act) - Native Vegetation Clearing Permit (NVCP) application. The application will be undertaken on the proposed road alignment route to the Department of Water and Environmental Regulation (DWER) to seek approval for clearing native vegetation on a new road reserve to facilitate construction of the road diversion. Authority has been provided to DLI to apply for a NVCP on behalf of the Shire of Menzies (Appendix 1). The road diversion has been applied for under the underlying crown lease Lot 15 on Deposited Plan 238440 on Crown Land Title LR3135/434.

This document has been prepared to support the NVCP application, which seeks approvals for clearing of up to 11 hectares (ha) of native vegetation within a 46 ha proposed Purpose Permit Area (Figure 1-2). All summary of tenmenents is provided in Table 2-1.

The application for the NVCP (Purpose Permit) is based primarily on the findings of the *Reconnaissance Flora and Vegetation Survey of the Mt Ida Road Diversion,* April *2023* (Native Vegetation Solutions, 2023) and the *Vertebrate Fauna Risk Assessment Mt.Ida – Sandstone Road realignmnet, May 2023* (Terrestrial Ecosystems, 2023). The survey area for both reports was 46 ha (Appendix 5 and Appendix 6) and includes areas that is highly disturbed or cleared due to previous mining activity by other responsible companies.

1.1 Document Purpose

The purpose of this document is to provide the necessary information and justification, as prescribed within the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* to seek approval under Part V Division 2 of the EP Act for the clearing of Native Vegetation. This document has been prepared to support a NVCP application to DWER by MIG, to clear up to 11 ha within a 46 ha Purpose Permit Area located on underlying crown lease Lot 15 on Deposited Plan 238440 on Crown Land Title LR3135/434.

This NVCP document is structured to provide the following information:

- Description and map of the proposed Purpose Permit Area proposed for clearing in regard to location, size and purpose.

- Site overview, with a brief description of local climate, biogeographic region, geology, land use and land systems, soils, hydrology, and hydrogeology.
- Description of the proposed Purpose Permit Area to be cleared in regard to vegetation type, condition and representation in a regional context.
- Presence of significant flora species, including within the proposed Purpose Permit Area.
- Description of broad fauna habitat within the proposed Purpose Permit Area; and
- Discussion of proposed vegetation clearing in relation to the EP Act *Schedule 5 – Principles for clearing native vegetation*.

Figure 1-1: Regional location of the proposed Purpose Permit Area

Figure 1-2: Proposed road diversion layout and associated tenements

2 Background

The proposed Purpose Permit lies within the underlying crown lease Lot 15 on Deposited Plan 238440 on Crown Land Title LR3135/434.

2.1 Contact Details

This permit will be held by MIG on behalf of the Shire of Menzies.

Company Details:

Name: James Croser (Managing Director), Delta Lithium Limited

Trading Name: Delta Lithium Limited

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Authorised Person & Contact Person:

Claire McGuire, Environment & Sustainability Manager

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2.2 Land Holder Authorisation

The Mt Ida Road Diversion is being developed by Mt Ida Gold Pty Ltd (MIG) a wholly owned subsidiary of Delta Lithium (DLI) on behalf of the Shire of Menzies. The authority to submit this NVCP on behalf of the Shire of Menzies is provided in Appendix 1.

A letter of consent has been issued by pastoral station owners, Zenith Australia Investment Holdings and is provided in Appendix 2.

A letter of approval has been issued by Department of Planning, Lands and Heritage for access to clear the land for the proposed road diversion. This is included in Appendix 3.

A letter of consent has been received from Aurenne MIT Pty Ltd, tenement holder of E29/921, P29/2486 and E29/993, which the road diversion will affect. This is included in Appendix 4.

3 Proposed Activities

3.1 Description of Proposed Activities

The proposed Mt Ida Road diversion involves the realignment of the Mt Ida Sandstone road to ensure the safety and well-being of the community by avoiding the potential risks associated with mining activities occurring at the Mt Ida Lithium Gold Project.

The construction of the proposed Mt Ida Road Diversion will involve several steps. Surveying and planning will be completed to determine the optimal alignment for the new road. Earthwork and excavation works will follow, during this stage of construction vegetation and other obstacles will be cleared. The road will comprise 10m pavement and 200mm base cover and will be graded and compacted to ensure stability. To manage water flow effectively, culverts will be installed as per the engineering design. Finally, the road surface will be paved, and signage and road markings will be put in place to provide clear guidance and enhance safety for drivers. Material for the construction of the road will be sourced from the Mt Ida minesite.

An indicative layout of the proposed road diversion is provided as Figure 3-1.

3.2 Estimated Vegetation Disturbance Requirements

The Shire proposes that under this application, up to 11 ha of native vegetation will be cleared within the 46 ha Purpose Permit Area. The proposed layout is shown in Figure 1-2.

Due to past mining and exploration activities, there is existing disturbance on site, covering approximately 2.5 ha. A summary of current and proposed clearing per tenement is included as Table 3-1.

Table 3-1: Existing native vegetation and disturbance in the proposed Purpose Permit Area

	Area (ha)
Total native vegetation in permit area	43.5
Total existing disturbance in permit area	2.5
Proposed purpose permit area	46.0

3.3 Indicative Time

MIG proposes to commence vegetation clearing in Q4 2024. Clearing activities will be implemented concurrent to the construction of the Mt Ida Road diversion.

3.4 Method of Vegetation Clearing

As the road construction is critical to MIG operations at the Mt Ida Lithium Project, construction works shall be undertaken by MIG on behalf of the Shire.

MIG will ensure all clearing and ground disturbance is carried out in accordance with their Ground Disturbance Procedure (Red Dirt Metals Ltd 2023). Noting this, the following methods of vegetation clearing will be implemented during the construction phase of the Project:

- Prior to clearing, a project-specific internal Surface Disturbance Permit (SDP) will be completed and signed off by the Environmental Department.
- Clearing areas will be delineated in accordance with the project-specific internal SDP, the clearing boundary will be surveyed and demarcated with survey pegs and flagging tape.
- Vegetation will be removed prior to topsoil stripping. Vegetation will generally be cleared 'blade up' with bulldozers or graders within the proposed Purpose Permit Area. Diggers and loaders may be used around drainage lines as required.
- Vegetation will typically be stripped and stored to the side of each disturbed are for use in rehabilitation works. Areas with thicker vegetation may need to have the vegetation pushed into piles and mulched.
- An average topsoil salvage depth of 0.2 m of the soil profile within the proposed disturbance areas will be stripped (where possible) and placed in stockpiles (paddock dumped not greater than 2 m in height with adequate distance between them to create a series of mounds and troughs).
- Subsoil may also be stripped and stockpiled separately to ensure adequate capping material and growth medium is collected.
- Any (non-vegetative) surface litter or waste present will be collected and stockpiled in the allocated landfill area.
- Machinery operators will aim to minimise the frequency and intensity of disturbance, so they do not compromise the structural integrity of the soils. Handling of topsoil will be minimised as much as possible especially when wet.
- Soil stripping is planned to occur as close as possible to the time when the proposed mining is scheduled to commence.

3.5 Operational Controls

To ensure that the Mt Ida Road diversion does not contribute to the spread of weed species, MIG and any contractors commissioned by MIG will complete a Weed, Seed, and Hygiene Certificate prior to arrival upon site and adhere to hygiene procedures to minimise the risk of spreading or introducing weeds within the proposed Purpose Permit Area.

Further controls will be placed on vehicles leaving site if the vehicle is considered to have traversed weed-impacted areas. Weed management will be outlined in the MIG Environmental Management Plan.

3.6 Rehabilitation and Maintenance

The road is not planned for rehabilitation, as this will be a permanent road realignment.

Figure 3-3: Indicative road diversion layout

4 Site Overview

4.1 Biogeographic Location

The proposed Purpose Permit Area lies within the Eastern Murchison (MUR01) subregion of the Murchison (MUR) bioregion (Figure 4-1) as outlined by the Interim Biogeographic Regionalisation for Australia (IBRA). The Eastern Murchison subregion covers over 7 million hectares and is described as internally draining, with extensive areas of elevated red desert sandplains with minimal dune development (Native Vegetation Solutions, 2023). The bioregion includes broad plains with red-brown soils and breakaway complexes as well as red sandplains. Vegetation is dominated by Mulga woodlands often with ephemerals, hummock grasslands, saltbush shrublands and halosarcia shrublands (Cowan et al. 2001). The region also contains several Salt Lake systems, such as Lake Ballard.

Figure 4-4: Location of the proposed Purpose Permit Area within the Murchison bioregion

4.2 Climate

The climate within the proposed Purpose Permit Area is classified as Arid and characterised by low rainfall, hot dry summers, and mild winters. Rainfall is evenly distributed between the summer and winter months, however thunderstorm activity in summer months results in slightly larger monthly averages. Evaporation exceeds rainfall in all months and averages over 3,000 mm per year. The highest mean maximum and minimum temperatures from Menzies meteorological station (No. 012052), which is located 85km to the southeast, are in January with an average 35.1°C and 19.7°C, respectively (Bureau of Meteorology, 2022). The lowest mean daily maximum and minimum temperatures occur in July (Figure 4-2).

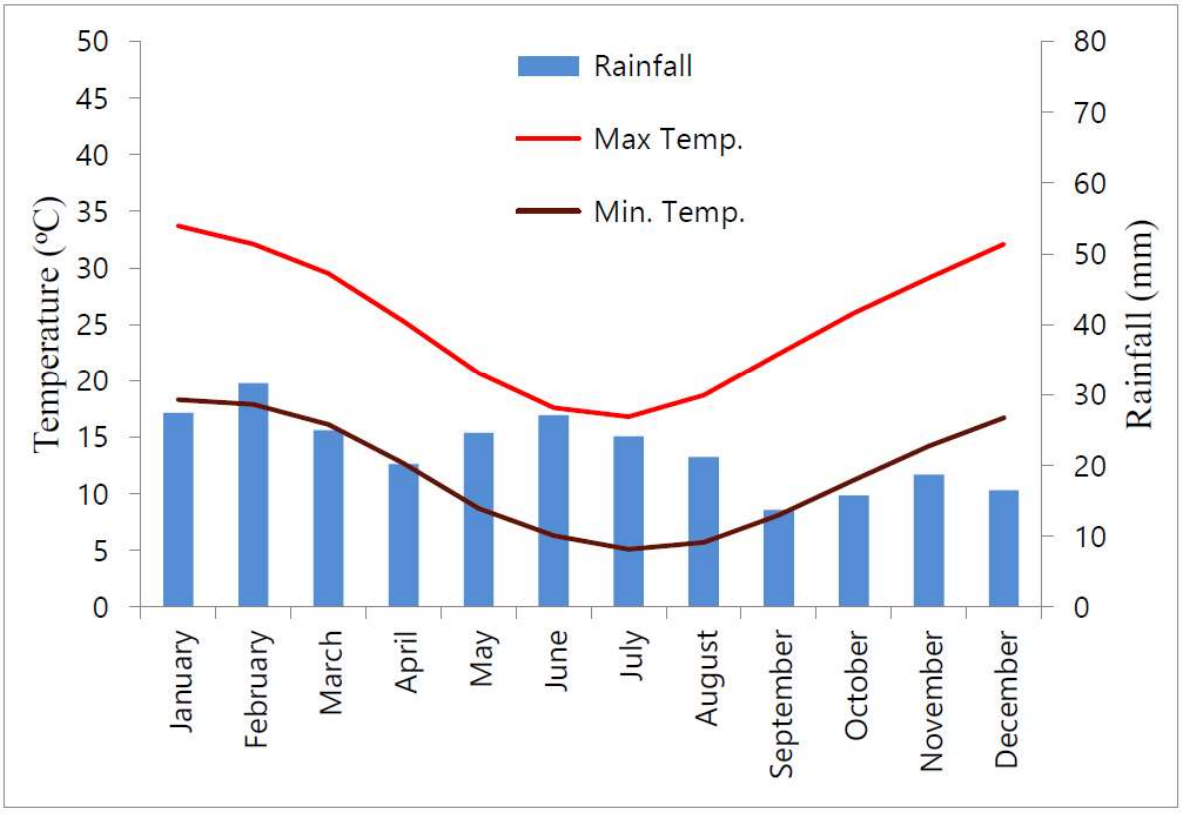

Figure 4-5: Monthly Weather for Menzies meteorological station (No. 012052) (Source: BOM, 2022)

4.3 Land Use

A combination of land uses with a range of different stakeholders are present in the proposed Purpose Permit Area. The principal land uses in the area involve mining and pastoral activities.

Other land uses include recreational prospecting, transport, and tourism. Numerous small and abandoned mines and open shafts are evident throughout the landscape. The proposed Purpose Permit Area has been subject to previous mining exploration and operational activity.

4.4 Conservation Reserves and Environmentally Sensitive Areas

The proposed Purpose Permit Area does not overlap with any Environmentally Sensitive Areas (ESAs).

The nearest ESA is Lake Ballard, which is nationally important wetland located approximately 40km southeast from the proposed Purpose Permit Area. Lake Ballard is a large intermittent Salt Lake, it is usually a dry saline basin which fills approximately once every five years. When full, Lake Ballard is an important breeding ground for several water bird species most notably the endemic Banded Stilt (*Cladorhynchus leucocephalus)*, a nomadic wading bird which travels vast distances to breed in shallow saline lakes (DoEE, 2019).

4.5 Land Systems and Soils

Land systems are defined as an area or group of areas throughout which there is a recurring pattern of topography, soils, and vegetation (Tille 2006). An assessment of land systems provides an indication of the occurrence and distribution of vegetation types (Purdie et al. 2004). The proposed Purpose Permit Area contains the Nubev System (40.94%), the Gransal System (52.79%), the Bevon System (4.4%), and the Rainbow System (1.87%) (Table 4-2; Figure 4-3).

Table 4-2: Extent of land systems within the proposed Purpose Permit Area

		Extent within the Purpose Permit Area	
Land System	**Description**	**Extent (ha)**	**Proportion (%)**
Nubev System	Gently undulating stony plains, minor limonitic low rises and drainage floors supporting mulga and halophytic shrublands.	19.06	40.94
Gransal System	Stony plains and low rises based on granite supporting mainly halophytic low shrublands.	24.58	52.79
Bevon System	Irregular low ironstone hills with stony lower slopes supporting mulga shrublands.	2.05	4.40
Rainbow System	Hardpan plains supporting mulga tall shrublands.	0.87	1.87

Figure 4-6: Land Systems of the proposed Purpose Permit Area

4.5.1 Soil Characteristics

The soils of the Eastern Goldfields have been described in general terms by Beard (1978). They typically comprise sandy loams, although skeletal stony soils occur on the rocky ridges, sands occur in the dunes, and sandy clays occur in the bottomlands. Depressions throughout the Eastern Goldfields are generally saline, and large areas of alkaline soils occur where parent materials are close to the surface.

The proposed Purpose Permit Area consists of Unit BE3 and is within the Salinaland Plains Zone (Figure 4-4). The Salinaland Plains Zone is defined as broken slopes and ridges characterised by breakaways, generally on gneissic granites and allied rocks; iron-stone gravel pavement variably present: chief soils seem to be shallow earthy loams (Um5.3) with some shallow (Gn2.12) soils, both underlain by a red-brown hardpan. Associated are a variety of (Dr1) soils, such as (Dr1.32), (Dr1.42), and (Dr1.82), and (Dr1.73) on outwash areas below the breakaways. These soils are often only 6-15 in. deep; some (Um5.11) and (Gc1.12) soils on calcrete (kunkar) platforms between shallow drainage-ways on the outwash areas below the breakaways; some (Um) and (Dr2.32) soils on pediments; and much mottled- and pallid-zone material along the slope of the breakaway with some block laterite (Australian Soil Resource Information System, 2022).

Figure 4-7: Soil landscape zones of the proposed Purpose Permit Area

4.6 Geology

4.6.1 Local Geology

The Permit Area intersects six geological units (Figure 4-5) and are described below.

The Copperfield Granite (CGR). CGR is an extensive granitoid, which forms the core to the Kurrajong Anticline.

The Dick Amphibolite (DAM). A fine to medium grained amphibolite with a 'sparkly hornfels' character, akin to many mafic rocks observed in close proximity to large granitoids in the Yilgarn. Variations in colour and grainsize are observed in outcrop and on drill heaps, suggesting that DAM is a composite of at least 2 different mafic units, although this has not been tested. The unit is approximately 100m thick.

The Anorthosite (MAN). MAN is interpreted to be a single sill, with a thickness of ~300m. It consists of an anorthosite upper portion, (i.e.,>90% plagioclase, var. labradorite) to the west, and a gabbro-anorthosite lower portion (~50-80% plagioclase).

Central Amphibolite (CAM). The Central amphibolite may be equivalent to DAM, with the anorthosite intruded into it.

The Unexpected Ultramafic (UUM). The highly magnetic character of UUM means that it can be traced on aeromagnetic images over the strike length of the lease. Earlier reports suggest that UUM increases in thickness to the south, where it hosts the Unexpected Lode.

The Timoni Amphibolite (TAM). The TAM hosts the 250,000oz Timoni Lode, as well as the Federation Lode ~300m to the west. The TAM has been previously interpreted to consist of sedimentary and volcanic amphibolites.

Figure 4-8: Local geology of the proposed Purpose Permit Area

4.7 Surface Water and Hydrology

The proposed Purpose Permit Area is located within the Lake Raeside catchment. The ground surface slopes gently to the north where a network of ephemeral creeks form. There are no permanent water courses or other surface water features in the area. A small dry watercourse trends north easterly across the proposed Purpose Permit Area. Stream flow occurs only after heavy storms or after persistent low intensity rainfall.

Surface drainage is generally contained in the local creek systems, which eventually flow in years of high rainfall to the salt lakes of Lake Raeside to the north-east and Lake Ballard to the south-east. These lakes are located approximately 40km from the proposed Purpose Permit Area and due to distance and infiltration only the high rainfall events and years reach the regional lakes. Disturbance in the proposed Purpose Permit Area is unlikely to have significant impact on the regional drainage systems.

5 Environmental Values

This section contains information about the environmental characteristics of the proposed Purpose Permit Area, specifically relating to flora, vegetation, and terrestrial fauna values, that may be relevant to this NVCP application. The assessment against the ten clearing principles has also taken into regard the geological, soil characteristics, and hydrogeology to inform the impact predictions.

5.1 Flora

5.1.1 Survey Objective, Area, and Timing

A reconnaissance flora survey was conducted by Native Vegetation Solutions (NVS) in April 2023. The survey area was 46 ha which encompassed and extended beyond the proposed Purpose Permit Area (Figure 5-1). The objective of the survey was to understand the flora and vegetation values of the survey area, including a literature review and a search of the relevant databases, characterising the flora, delineating vegetation units, and providing an assessment of the significance of the flora and vegetation.

5.1.2 Flora of Significance

No Priority Flora or Threatened Flora were recorded in the survey area.

The Department of Biodiversity, Conservation and Attractions (DBCA) database searches revealed no Threatened and four Priority Flora species to occur within a 10km radius of the Survey area (Figure 5-2). The closest Priority Flora was located approximately 1.1 kilometres (km) west of the survey area.

5.1.3 Introduced Flora

No weed species was recorded within the survey area.

Figure 5-9: Flora Survey area Mt Ida Lithium Project

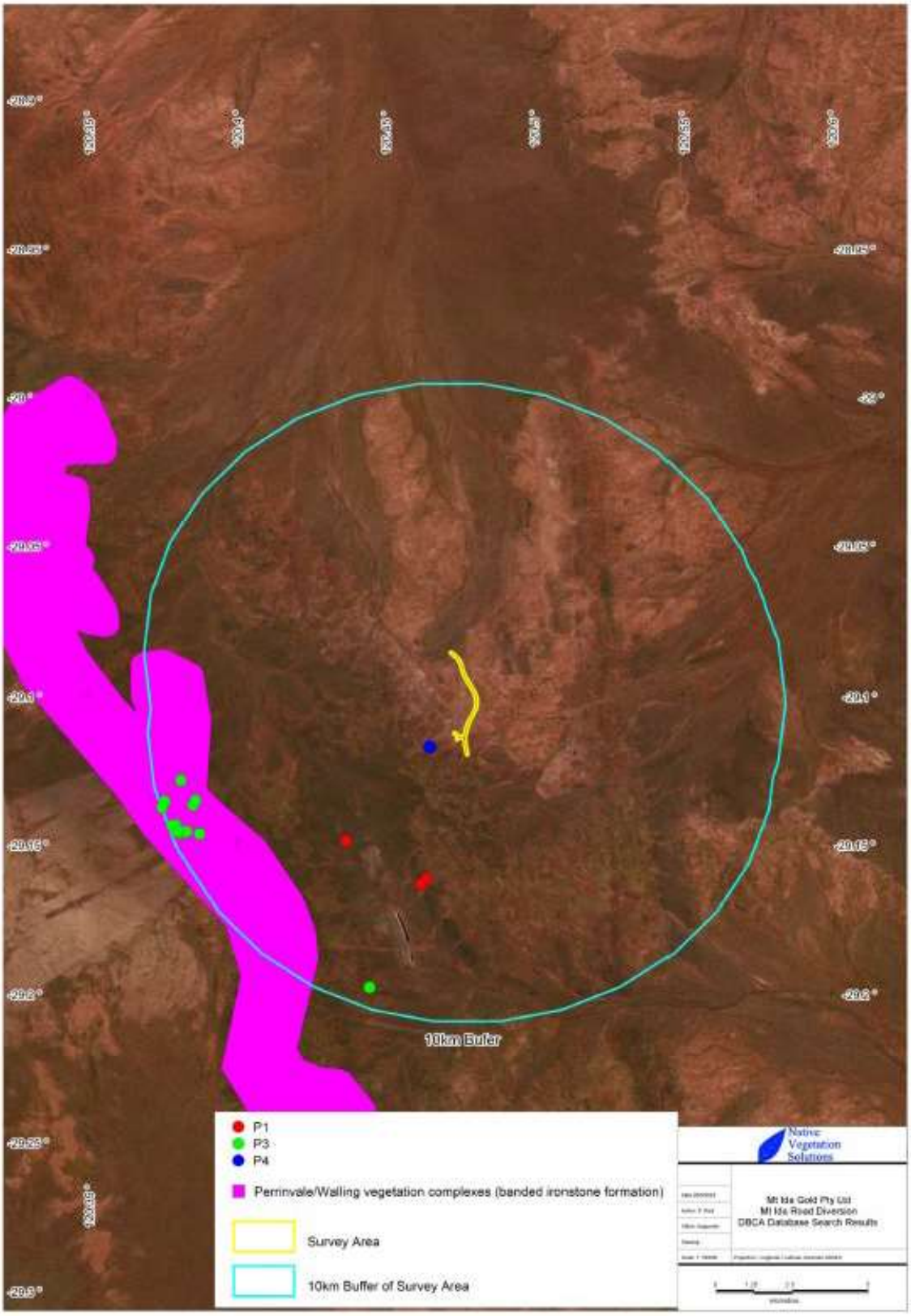

Figure 5-10: DBCA Threatened Flora Database Search Results (Source: NVS, 2023)

5.2 Vegetation

5.2.1 Vegetation Types

A total of 22 Families, 38 Genera and 73 Species were recorded within the survey area. Four major vegetation groups were recorded in the survey area (Figure 5-3). No unique or restricted vegetation communities were identified and all vegetation types are common, widespread, and well represented in the Eastern Murchison subregion (NVS, 2023).

Table 5-3: Vegetation Group Summary (NVS, 2023)

Veg ID	Vegetation Group	Total Survey Extent (ha)	Proportion of Survey Area (%)	Total within permit area (ha)	Total within indicative disturbance footprint (ha)	Representative Photograph
A	Mulga over *Maireana sedifolia* and sclerophyll shrubland	13.77	29.57	13.77	3.5	
B	Mulga Creekline Vegetation	2.84	6.10	2.2	0.6	

Veg ID	Vegetation Group	Total Survey Extent (ha)	Proportion of Survey Area (%)	Total within permit area (ha)	Total within indicative disturbance footprint (ha)	Representative Photograph
C	Mulga Woodland	21.62	46.43	21.62	5.4	
D	Open chenopod shrubland with occasional Mulga overstory	5.92	12.72	5.92	1.1	

Veg ID	Vegetation Group	Total Survey Extent (ha)	Proportion of Survey Area (%)	Total within permit area (ha)	Total within indicative disturbance footprint (ha)	Representative Photograph
N/A	Existing Disturbance	2.41	5.18	2.41	0.3	
TOTAL		45.55	100	**45.55**	**10.9**	

5.2.2 Vegetation of Significance

There was no vegetation of significance mapped within, or adjacent to, the proposed Purpose Permit Area and no vegetation types were analogous to any known Threatened Ecological Communities (TECs) or Priority Ecological Communities (PECs). The Perrinvale/Walling vegetation complexes PEC, listed as P1 under the Western Australian *Biodiversity Conservation Act 2016* (BC Act), is located approximately 7 km west from the proposed Purpose Permit Area (Figure 5-2) and will not be impacted by this proposal.

5.2.3 Vegetation Condition

Vegetation condition in the survey area ranged from 'Completely Degraded' to 'Very Good' condition (Figure 5-4). Evidence of extensive historic exploration and mining activities (by others) as well as a number of access roads were identified throughout the survey area.

Overall, most of the survey area was classified as 'Good.' Areas which were affected by historic exploration and clearing were deemed to be in 'Completely Degraded' condition.

5.2.4 Pre-European Vegetation

The proposed Purpose Permit Area is situated within two vegetation units defined by Beard (1990). The vegetation units identify the pre-European extent of vegetation. The national objectives and targets for biodiversity conservation recognise that the retention of 30% of more of the pre-clearing extent of Beard's vegetation associations is necessary for biological diversity. The extent of the two Beard vegetation units within the survey area is less than 1% of the total area for each scale and above the 30% threshold at a State, bioregional and subregional scale (Table 5-2). The development of the project will not trigger any national objectives for biodiversity conservation.

The implementation of this proposal will not have a detrimental effect on Pre-European vegetation associations.

Table 5-4: Extent of Beard Associations within survey area

Beard Vegetation Association	Description	Extent (ha)	Proportion of Survey Area (%)	Scale			
				WA extent	By IBRA Region (MUR)	By IBRA Sub-region (MUR1)	By Shire (Menzies)
39	Shrublands; mulga scrub.	45.49	97.72	<1%	<1%	<1%	<1%
18	Low woodland; mulga (Acacia aneura).	1.06	2.28	<1%	<1%	<1%	<1%

Figure 5-11: Vegetation Groups within the proposed Purpose Permit Area

Figure 5-12: Vegetation Condition of the proposed Purpose Permit Area

5.3 Terrestrial Fauna

A *Vertebrate Fauna Reconnaissance risk assessment* was undertaken in May 2023 by Terrestrial Ecosystems. The survey area was 46 ha which encompassed and extended beyond the proposed Purpose Permit Area.

5.3.1 Survey Objective and Methods

The objective of the survey was to undertake a basic fauna risk assessment and a search of the proposed Purpose Permit Area for Malleefowl (*Leipoa ocellata*) and their mounds. The purpose of the fauna risk assessment was to determine the potential impacts of disturbance activities on the vertebrate fauna assemblage in the proposed Purpose Permit Area.

The assessment involved a search of online databases including *the Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to identify species potentially occurring in the area and a survey to search for Malleefowl and their mounds and to identify available fauna habitat types.

5.3.2 Fauna Habitats

One broad fauna habitat was identified from fauna habitat assessments within the proposed Purpose Permit Area (Figure 5-5). This habitat was described as mixed mulga, acacia, and chenopod shrubland. The density of trees and shrubs varies across the area with denser vegetation evident along drainage lines. Some of the proposed Purpose Permit Area is highly disturbed or cleared and is therefore devoid of terrestrial vertebrate fauna.

5.3.3 Fauna Assemblage

Fauna survey data provided by Cowan and How (2004), and Dell and How (1988) provide an indication of the vertebrate fauna assemblage for the proposed Purpose Permit Area. The proposed Purpose Permit Area is mostly sparsely vegetated, and there is very little leaf litter on the ground indicating a limited fauna assemblage with few individuals being present.

5.3.4 Fauna of Significance

Conservation significant species identified in the database searches are outlined in Table 5-3 below.

No threatened species of fauna were identified from the survey effort.

Table 5-5: Conservation species recorded in database searches (Terrestrial Ecosystems, 2022)

Species	DBCA Schedule/ Priority	Status under Commonwealth EPBC Act	Likelihood to occur in the proposed Purpose Permit Area
Night Parrot (Pezoporus occidentalis)	Critically Endangered	Endangered	Highly unlikely to occur in the proposed Purpose Permit Area
Sandhill Dunnart (Sminthopsis psammophila)	Endangered	Endangered	Highly unlikely to occur in the proposed Purpose Permit Area
Malleefowl (Leipoa ocellata)	Vulnerable	Vulnerable	Highly unlikely to occur in the proposed Purpose Permit Area
Chuditch (Dasyurus geoffroii)	Vulnerable	Vulnerable	Highly unlikely to occur in the proposed Purpose Permit Area
Grey Falcon (Falco hypoleucos)	Vulnerable	Vulnerable	Highly unlikely to occur in the proposed Purpose Permit Area
Princess Parrott (Polytelis alexandrae)	Vulnerable	Vulnerable	May infrequently be seen in the proposed Purpose Permit Area
Fork-tailed Swift (Apus pacificus)	Migratory	Migratory	May infrequently be seen in the proposed Purpose Permit Area
Grey Wagtail (Motacilla cinerea)	Migratory	Migratory	Highly unlikely to occur in the proposed Purpose Permit Area
Peregrine Falcon (Falco peregrinus)	Other	-	May infrequently be seen in the proposed Purpose Permit Area
Woma (Aspidites ramsayi)	Priority 1	-	Highly unlikely to occur in the proposed Purpose Permit Area
Mulgara (Dasycercus blythi)	Priority 4	Vulnerable	Highly unlikely to occur in the proposed Purpose Permit Area
Central Long-eared Bat (*Nyctophilus* major tor)	Priority 3	-	Unlikely to occur in the proposed Purpose Permit Area

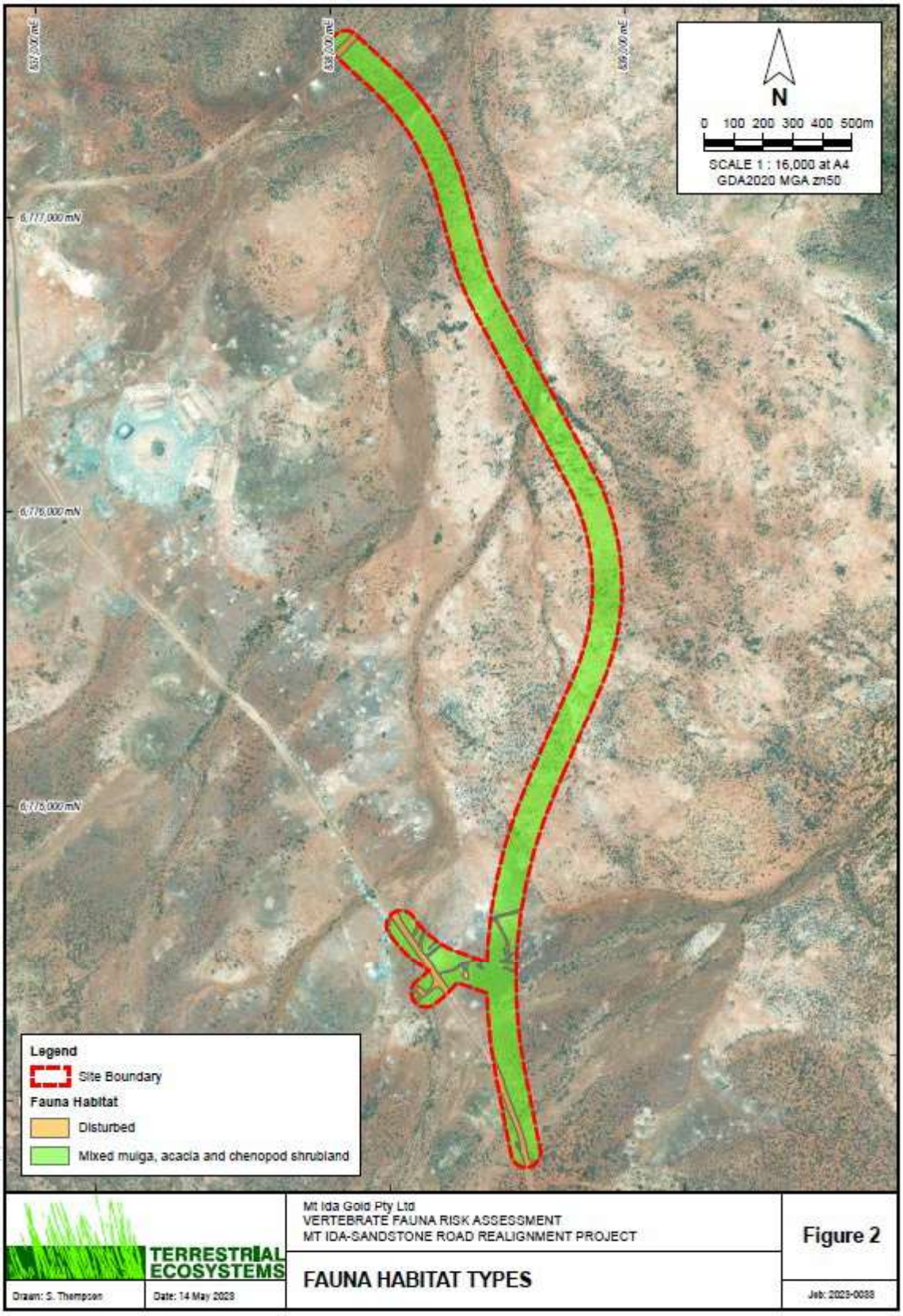

Figure 5-13: Fauna habitat types of the proposed Purpose Permit Area (Source: Terrestrial Ecosystems, 2023)

6 Environmental Management Measures and Rehabilitation

6.1 Approved Policies and Planning Instruments

The clearing of native vegetation in Western Australia is regulated under Part V of the EP Act and the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004*. In addition to the matters required to be considered in accordance with s. 51O of the EP Act, MIG has also had regard for the below statutes, polices and guidelines:

- *Environmental Protection Act 1986* (WA) (EP Act)
- *Biodiversity Conservation Act 2016* (WA) (BC Act)
- *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act)
- *Soil and Land Conservation Act 1945*
- *Rights in Water and Irrigation Act 1914*
- *Aboriginal Heritage Act 1972*
- *Aboriginal Cultural Heritage Act 2021*
- WA Environmental Offsets Policy (Government of Western Australia 2011)
- A guide to the assessment of applications to clear native vegetation: Under Part V Division 2 of the *Environmental Protection Act 1986* (Department of Environmental Regulation 2014)
- Procedure: Native vegetation clearing permits (Department of Water and Environmental Regulation 2021)
- Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment (Environmental Protection Authority 2016)
- Technical Guidance – Terrestrial vertebrate fauna surveys for environmental impact assessment (Environmental Protection Authority 2020b).

6.2 Management Measures – Avoidance

MIG is committed to appropriately managing its activities and ensuring any potential impacts to the environment are avoided where possible. Where practical, existing disturbed areas will be utilised to minimise clearing requirements.

In addition, MIG are committed to undertaking all compliance monitoring and reporting stipulated by applicable laws and regulations, and the operation will require all employees to exercise appropriate environmental practices.

Environmental management includes:

- identifying risk and hazards
- operational environmental management plans
- training and competencies
- monitoring programs
- auditing and inspections
- incident investigation
- reporting requirements.

6.3 Management Measures – Minimisation

6.3.1 Land Clearing and Flora Management

MIG will ensure all clearing and ground disturbance is carried out in accordance with their Ground Disturbance Procedure. The following actions will be implemented to minimise and manage land disturbance impacts:

- Prior to clearing, an internal Surface Disturbance Permit (SDP) will be completed and signed off by the relevant Environment Department.
- The disturbance permit will identify any conditions that apply to the clearing area (including any protected areas / species to be avoided where practicable).
- The clearing area will be delineated on foot and marked with survey pegs and flagging tape to ensure only the surveyed area is cleared.
- Clearing will not be undertaken until construction is imminent, minimising erosion and dust risks.
- Environmental awareness training will be completed by personnel involved in clearing activities (including identification of flora and fauna of conservation significance).
- A spotter will be used during clearing of external boundaries to ensure clearing remains within approval boundaries.
- Fire management practices will be implemented.
- No burning of vegetation spoil will occur on site.
- All cleared vegetation will be stockpiled for later use in rehabilitation activities.

6.3.2 Weed Management

MIG will aim to prevent the introduction and spread of weeds in the proposed Purpose Permit Area as far as practicable. The following management measures will be implemented to minimise the risk of introducing flora into the proposed Purpose Permit Area:

- Weed, Seed and Hygiene Certificates will be presented as verification prior to mobilisation.
- All vehicles and equipment will be cleaned before mobilisation to the proposed Purpose Permit Area, to remove all dirt and vegetative materials.
- Vehicle and equipment washdown will only occur at an appropriate facility.
- Off-road vehicle use will be strictly controlled with no driving permitted off designated roads.
- Any new weed outbreaks will be recorded in the MIG's Incident Reporting system and managed in accordance with site environmental procedures.
- Any vehicles that may have traversed weed impact areas will be cleaned prior to leaving site.

6.4 Fauna Management

MIG will aim to ensure fauna species are not adversely affected by clearing, including both by direct impacts and impacts to habitat. The following management measures will be implemented to minimise the potential impacts on fauna:

- Pre-clearance surveys within the specified clearing areas will be undertaken in the morning of clearing to search for the presence of significant fauna species.
- No clearing at night will occur to avoid impacting nocturnal species.
- Awareness training will outline the appropriate behaviour and responses in the event of contact with native fauna.
- Native fauna will not be captured, fed, harmed, or disturbed. If relocation is required, site environmental department will be contacted.
- All significant fauna deaths will be reported through the company incident reporting system.
- An SDP will be required for all clearing.
- Open excavations will be monitored regularly to ensure that any trapped fauna is rescued and released as quickly as possible.
- Rehabilitation will be conducted progressively where possible.
- No pets or other animals will be brought to the construction site.
- All bores and drill holes will be capped.

6.4.1 Dust Management

MIG will aim to minimise fugitive dust emissions and other air quality issues created during construction by:

- Using water to suppress dust emission from unsealed roads, stockpiles and work areas as required.
  - Ensure that any saline water used is only sprayed within the haul roads and cleared infrastructure footprints, dribble bars will be used where required.
  - Implement water truck operating procedures and train water cart operators so that personnel are aware of the potential impacts of saline water on vegetation.
- Reducing vehicle speeds as appropriate if dust emission from roads is visually excessive.
- Where possible, operational activities will be scheduled to avoid high winds that may generate excessive dust.
- Report and respond to any community complaints regarding dust emissions that are deemed excessive as an incident.

6.4.2 Soil and Topsoil Management

Topsoil is an important resource for rehabilitation of disturbed sites, which need to be managed effectively. Incorrect management of topsoil can impact upon the soil structure and decrease its usefulness in rehabilitation. Topsoil will be managed by:

- Stockpiling vegetation, topsoil, and subsoil as per the SDP.
- Stripping topsoil to the required depth (average salvage depth of 0.2m).
- Not using topsoil for construction of windrows bulk fill or in surface water management.
- Not using saline water for dust suppression during topsoil / subsoil harvesting or rehandling.
- Not storing materials or equipment on topsoil stockpiles.
- Marking out stockpile locations on maps and recording them in a GIS database, along with volumes.
- Implement weed, seed, and hygiene requirements.

6.4.3 Water Management

The proposed Purpose Permit Area is not located within any major drainage lines or watercourses; therefore, clearing is not expected to impact surface water flow. Additionally, the proposed clearing is not located in proximity to any public drinking water source areas. Surface water management measures will be implemented if required to divert surface water flow from the proposed road diversion. MIG will aim to minimise impacts on the quality of surface water and will avoid unnecessary disturbance to natural surface drainage. General

recommendations for surface water management that will be considered for all mine infrastructure areas include:

- Implement erosion and sediment management measures where there is a risk of:
  - discharge of runoff from construction occurring to downstream environments; and/or
  - discharge of sediment laden runoff.
- Installation of culverts and road drainage options where there are risks of modification to downstream flow.
- Construction and / or maintenance of roadside drainage so that runoff from the road diversion will be contained during rainfall events.

Clearing is unlikely to impact on groundwater quality provided that groundwater contamination from the use of hydrocarbons and chemicals will be actively managed as detailed in Section 6.4.4.

6.4.4 Hydrocarbon Management

MIG will actively manage the storage and use of hydrocarbon in machinery and vehicles to minimise and contain spills and uncontrolled releases to prevent impacts to vegetation, soil and/or water. Increased vehicle activity during construction and operation may result in hydrocarbon spills; however, MIG aims to minimise such occurrences by ensuring that:

- Hazardous materials are approved prior to site entry.
- Hydrocarbons and chemicals are safely stored.
- Hydrocarbons and other hazardous wastes are collected, treated, transported, and disposed of in an environmentally sound manner, in accordance with regulatory and legislative requirements.
- Effective spill clean-up material is readily available at each work site and on all mobile service trucks or vehicles, and where hydrocarbons and chemicals are stored, dispensed and / or used.

7 Assessment Against the 10 Clearing Principles

7.1 Scale of the Proposed Clearing

The proposed Purpose Permit Area covers an area of 46 ha of native vegetation of which 2.2 ha (5%) is in 'Very Good' condition; 40.94 ha (90%) is in 'Good' condition; and 2.41 ha (5%) is in 'Completely Degraded' condition (NVS, 2023) (Table 7-1). NVS (2023) identified four (4) vegetation units that would occur within the permit area. Indicative disturbance is provided in Table 7-2.

Table 7-6: Vegetation condition and habitats which will be cleared within the proposed Purpose Permit Area

Vegetation Condition	Extent (ha)	Proportion of proposed Purpose Permit Area (%)
Very Good	2.20	4.8%
Good	40.94	89.9%
Completely Degraded	2.41	5.3%

Table 7-7: Vegetation units within the proposed Purpose Permit Area and indicative disturbance

Veg ID	Vegetation Group	Total Survey Extent (ha)	Proportion of Survey Area (%)	Total within permit area (ha)	Total indicative disturbance (ha)
A	Mulga over *Maireana sedifolia* and sclerophyll shrubland	13.77	29.6	13.77	3.5
B	Creekline Vegetation	2.84	6.1	2.84	0.6
C	Mulga Woodland	21.62	46.4	21.62	5.4
D	Open chenopod shrubland with occasional Mulga overstorey	5.92	12.7	5.92	1.1
N/A	Existing Disturbance	2.41	5.2	2.41	0.3
TOTAL		**46.56**	**100**	**46.56**	**10.9**

7.2 Assessment Against the 10 Clearing Principles

The proposed clearing works were assessed against the 10 clearing principles for native vegetation as listed in *Schedule 5 of the EP Act* (Table 7-3). The 10 clearing principles stipulate when native vegetation should not be

cleared. The proposal to clear native vegetation for the Mt Ida Road Diversion is considered in terms of these principles, in accordance with Department of Environmental Regulation (2014) (now Department of Water and Environment Regulation) assessment guidelines. As detailed design has progressed, an Indicative Footprint has been delineated to accommodate the road diversion and is 11 ha within the 46 ha Purpose Permit Area. Clearing will not extend beyond the proposed Purpose Permit Area and MIG commits to avoiding and minimising impacts to significant flora as far as practicable. The following sections address each of the 10 clearing principles as specified in *Schedule 5 of the EP Act*. These assessments have been made using information obtained from existing surveys and reports commissioned by MIG.

Table 7-8: Assessment against the 10 clearing principles of clearing native vegetation within the proposed Purpose Permit Area.

Clearing Principle	Justification of Variance	Variance
Principle (a) Native vegetation should not be cleared if it compromises a high level of biological diversity.	The proposed Purpose Permit Area is 46 ha in area, of which 43.14 ha (95%) contains remnant vegetation. No Priority or Threatened flora species were recorded during the NVS (2023) reconnaissance survey. No PECs or TECs are known to occur within the proposed Purpose Permit Area. One PEC, the Perrinvale/Walling vegetation complexes, listed as P1 under the BC Act, is located more than 7km away from the proposed Purpose Permit Area and will not be impacted by construction. No significant fauna was recorded within the proposed Purpose Permit Area. One broad fauna habitat was identified from fauna habitat assessments with the proposed Purpose Permit Area and is described as mixed mulga, acacia, and chenopod shrubland. Overall, it is considered that the fauna habitat, biological diversity and occurrence of significant species within, and adjacent to, the proposed Purpose Permit Area is widespread throughout the surrounding region and not considered restricted to the area of proposed clearing.	Unlikely to be at variance.
Principle (b) Native vegetation should not be cleared if it compromises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia.	The proposed Purpose Permit Area contains one broad habitat: mixed mulga, acacia, and chenopod shrubland. More than 200 species of vertebrate fauna were identified as part of the Desktop Assessment including nine conservation significant species. Of the conservation significant species, three were identified as infrequently occurring in the proposed Purpose Permit Area, comprising the Princess Parrott (*Polytelis alexandrae*), Fork-tailed Swift (*Apus pacificus*) and Peregrine Falcon (*Falco peregrinus*). The remaining species were considered as Unlikely or Highly Unlikely to occur based on unsuitable habitat as well as the proposed Purpose Permit Area occurring outside the known species range. It is unlikely that significant fauna and their habitats are restricted to within the proposed Purpose Permit Area; therefore, clearing of native vegetation is unlikely to fragment, restrict or isolate any populations of significant fauna species.	Unlikely to be at variance.
Principle (c) Native vegetation should not be cleared if it includes or is necessary	No significant flora was recorded within the proposed Purpose Permit Area or were considered to have the potential to occur. Two individual BC-Act listed *Hermigenia exilis* (P4) was recorded adjacent to the proposed Purpose Permit Area. This species was not detected during the recent surveys conducted by NVS (2023). Therefore, it is considered unlikely that *Hermigenia exilis* is not found to be within the proposed Purpose Permit Area.	Not at Variance

<table>
<tr><th>Clearing Principle</th><th>Justification of Variance</th><th>Variance</th></tr>
<tr><td>for the continued existence of rare flora.</td><td></td><td></td></tr>
<tr><td>Principle (d)
Native vegetation should not be cleared if it compromises the whole or a part of or is necessary for the maintenance of a Threatened ecological community</td><td>No TECs were found to have buffers that overlap the proposed Purpose Permit Area.</td><td>Not at Variance</td></tr>
<tr><td>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.</td><td>The proposed Purpose Permit Area is situated within two vegetation associations being vegetation association 39 (Shrublands; mulga scrub) and vegetation association 18 (Low woodland; mulga (Acacia aneura)).
The significance of clearing a particular vegetation association can be determine by comparing current and pre-European extents (Table 7-3). Vegetation associations retaining less than 30% of their pre-European extent generally experience accelerated species loss at an ecosystem level and are regarded as being ‘vulnerable’, while vegetation types retaining less than 10% of their original extent are regarded as being ‘endangered’. The current extent of the vegetation associations is above the 30% threshold across all three scales of assessment (bioregion, subregion, LGA). In addition, given the small are of the proposed purpose Permit Area, it is unlikely that additional clearing will significantly reduce the overall extends.
Table 7-9: Pre-European extent of vegetation associations in the proposed Purpose Permit Area
<table>
<tr><th>Beard Vegetation Association</th><th>Scale</th><th>Pre-European Extent (ha)</th><th>Pre-European Extent Remaining (%)</th></tr>
<tr><td rowspan="3">39</td><td>Bioregion (MUR)</td><td>1,148,400</td><td>99.10</td></tr>
<tr><td>Subregion (MUR01)</td><td>711,328</td><td>98.68</td></tr>
<tr><td>LGA (Shire of Menzies)</td><td>46,182</td><td>99.77</td></tr>
<tr><td>18</td><td>Bioregion (MUR)</td><td>12,403,172</td><td>99.68</td></tr>
</table>
</td><td>Not at Variance</td></tr>
</table>

Clearing Principle	Justification of Variance	Variance
	Subregion (MUR01): 10,269,896 — 99.66 LGA (Shire of Menzies): 2,010,840 — 99.94	
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.	No wetlands of international or national significance are located within the vicinity of the proposed Purpose Permit Area. Lake Ballard is a listed Environmentally Sensitive Area and a nationally important wetland. However, it is considered unlikely that the native vegetation to be cleared will impact Lake Ballard or other surrounding wetlands and watercourses.	Not at Variance
Principle (g) Native vegetation should not be cleared if the clearing of vegetation is likely to cause appreciable land degradation.	The proposed Purpose Permit Area is located predominantly within the Gransal System (52.7%) which consists of strony plains and low rises on granite supporting mainly halophytic low shrublands and the Nubev System (40.9%) which consists of gently undulating stony plains, minor limonitic low rises and drainage floors. These land systems may be prone to land degradation as a result of clearing, presenting as salinisation and soil erosion. However, the small scale of clearing, proposed management measures and rehabilitation commitments means it is considered unlikely that the proposed clearing will result in salinisation or soil erosion.	Not at Variance
Principle (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.	The proposed Purpose Permit Are does not overlap any ESAs. The nearest ESA is Lake Ballard which is located approximately 40 km from the proposed Purpose Permit Area.	Not at Variance

Clearing Principle	Justification of Variance	Variance
Principle (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.	The proposed Purpose Permit Area is not located within any major drainage lines or watercourses. Therefore, clearing is not expected to impact surface water flow and/or water quality within any watercourse. Additionally, the proposed clearing is not located in proximity to any public drinking water source areas. Surface water management measures will be implemented if required to divert surface water flow away from mining infrastructure and avoid unnecessary disturbance to natural surface drainage. Clearing is unlikely to impact on groundwater quality provided that groundwater contamination from the use of hydrocarbons and chemicals will be actively managed.	Not at Variance
Principle (j) Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence of flooding.	The proposed Purpose Permit Area is not located within any major drainage lines or watercourses. Therefore, clearing is not expected to alter the hydrological regime of the area leading to an increase in the frequency or intensity of flooding.	Not at Variance

8 Stakeholder Consultation

MIG understands that stakeholders are an integral part of day-to-day operations and long-term operational strategy. In recognition of this, MIG will ensure that any communication with stakeholders will be undertaken in accordance with the following principles:

- Consultation is undertaken in a timely manner.
- Consultation is sincere and meaningful.
- Consultation ensures that all affected parties are included, and the information provided is easily accessible.
- Consultation is responsive and any concerns raised will be dealt in accordance with MIG's internal procedures.

A stakeholder engagement register will be developed and updated regularly to record all stakeholder consultations.

Table 8-10: Stakeholder consultation undertaken for the proposed Purpose Permit Area

Date	Stakeholder	Type	Description of Consultation
16/02/2022	Zenith Holdings	Email	Notification of proposed drill program to be undertaken on Riverrina and Perrinvale pastoral staions
1/03/2022	DoW	Phone call	Discussion if a GWL was required
6/05/2022	Albury Lynch	Phone call	request to undertake cultural awareness training in June
27/07/2022	Aurenne	Meeting	Meeting with Aurenne Environmental Dept to discuss upcoming plans and synergies for environmental knowledge
15/09/2022	Perrinvale	In person	Ricki (station owner) reached out to RDT for assistance to assist with improving his water bore pad
14/10/2022	Sturt Meadows	Email	Email to Sturt Meadows notifying of proposed PoW
18/11/2022	Sturt Meadows	Email	Discussion regarding water licence and application to search for water
6/12/2022	DMIRS	Meeting	Approvals discussion for DSO submission and road realignment
12/12/2022	Shire of Menzies	Meeting	Discussion on Mt Ida - Sandstone road movement, Mt Ida will apply for permits and design and present to the council for a meeting on

Date	Stakeholder	Type	Description of Consultation
			23/1/2023. Well supported for development of area and Shire is happy to work together
12/01/2023	Shire of Menzies	Email	CM request of traffic counter of Mt Ida - Sandstone Road
12/01/2023	Sturt Meadows	Email	Response to email received on 12/1/2023
17/01/2023	DPLH	Email	Followup to phone call for the removal and exemption of tenement conditions
1/02/2023	Juno Minerals	Meeting	Meeting to discuss options of movement of Mt Ida Road within the boundaries of Juno Minerals
6/02/2023	Mick Crowley	Phone Call	requesting an additonal 14 days of water access for the Golden Vale area.
14/02/2023	Perrinvale Pastoralist	Phone call	Discussion regarding water access
15/02/2023	Shire of Menzies	Meeting	Discusussion between RDT and CEO - Rob Stewart on road realignment and DSO project plan
24/02/2023	DWER- DOW	Email	RFI re application for groundwater licence 053444 at Timoni
28/02/2023	Aurenne	In person	Project update and company synergies for both
2/03/2023	Shire of Menzies	Phone call	Projects followup with road design and information to progress
3/03/2023	DMIRS	Email	Submisison of NVCP Application to support the Mining Proposal
15/03/2023	Juno Minerals	Meeting	Road diversion and syngergies of operations for the DSO Project
17/03/2023	Zenith Holdiing	Phone Call	Organise to meet and introduction to discuss the Mt Ida Project
20/03/2023	Zenith Holdiing	Meeting	Introduction to Manager of riverrina nad Perrinvale Stations owned by Zenith Australia Group. General introduction to the Project plans and proposed road diversions.
27/03/2023	Zenith Holidays	Email	Email to Zenith regarding meeting discussion - road access bores and water access.

Date	Stakeholder	Type	Description of Consultation
6/04/2023	Shire of Menzies	Email	Notification of advertisement in the West Australian and Kalgoorlie Miner for the road diversion advertisement
2/05/2023	Zenith Holdings - Riverina and Perrinvale Station	Email	Notification of Red Dirt Metals changing name to Delta Lithium on the Mt Ida Road Diversion. Notification of the final design being accepted by the Shire of Menzies and the 35 day advertisement period finishing on 12 May 2023. Notificaton that an NVCP will be submitted.
11/05/2023	Aurenne	Email	Notification to Aurenne to apply for POW to undertake test pits on proposed road diversion.
11/05/2023	DMIRS	Email	NVCP (CPS10121/1) Permit granted pending no appeals
24/05/2023	Aurenne	Email	Access to Aurennte Airstrip for Emergencey purposes
25/05/2023	Shire of Menzies	Meeting	Presentation of Mt Ida Road Diversion to council for approval
25/05/2023	Shire of Menzies		Road Diversion approved by Council meeting - notification of agenda
28/05/2023	Aurenne	Meeting	Site visit to determine access route to the Aurenne Airstrip for emergency purposes.
1/06/2023	Shire of Menzies	Email	Letter from Shire of Menzies to DPLH regarding the Mt Ida Road Closure and Diversion
8/06/2023	Shire of Menzies	Phone call	Discussion regarding gravel pit access and road diversion construction requirements.
9/06/2023	Shire of Menzies	Phone call	Discussion on road diversion construction without DPLH approval.
14/06/2023	Aurenne	Phone call	Phone call with Aurenne Environmental Manager to discuss options of using material from their WRL or gravel pits, COO and MD of companies to discuss options and agreements to be drafted.
19/06/2023	Aurenne	Meeting	Discussion on meeting and agreements to construct roads and access to tenure
19/06/2023	Zenith Holdings	Meeting	Discussion on meeting and agreements to construct roads and access to tenure
16/7/2023	Zenith Holidings	Meeting	Discussion on meeting and agreements to construct roads and access to tenure

Date	Stakeholder	Type	Description of Consultation
16/8/2023	Zenith Holdings	Meeting	Signature of Agreement and consent letter received.
8/9/2023	DPLH	Email	DPLH and Landagate discussions on additional information requirements from Shire of Menzies.
16/11/2023	DPLH	Phone call	Requesting an update on road status application.
20/11/2023	DPLH	Phone call	Phone discussion with DPLH regarding the road application, still pending review
31/1/2023	DPLH	Phone call	Assessment of application underway
28/3/2024	DPLH		Survey Instructions received
10/4/2024	Shire of Menzies		Notification of survey instructions received and discussion of planning when NVCP received.

9 Conclusion

MIG proposes to clear no more than 11 ha of native vegetation with a 46 ha Purpose Permit Area as part of the development of the Project. The proposed clearing is not at Variance to EP Act Schedule 5 clearing principles (c), (d), (e), (f), (g), (h), (i) and (j). Clearing is unlikely to be at variance to EP Act Schedule 5 clearing principle (a) or (b) based on the small scale of clearing, proposed management measures and rehabilitation commitments.

Development of the Project will result in the loss of some vegetation and terrestrial fauna habitat. However, the fauna habitat is regionally widespread and is not considered restricted to the area of clearing. Similarly, a significant extent of the vegetation association is present elsewhere and a small proportion is already degraded during to previous mining and exploration activity. Finally, an absence of conservation significant species within the proposed Purpose Permit Area indicates the proposed clearing will not affect the conservation values for vegetation, flora, or fauna.

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