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Native Vegetation Clearing (Purpose) Permit Application Support Document

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Patricia Jean Permit Application Area

Mining Tenure

L 15/130

L 15/177

L 15/283

M 15/630

M 15/636

M 15/781

M 15/827

M 15/1444

Coolgardie Gold Operations

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2. Invertebrate Solutions (2022). Desktop Assessment for Subterranean Fauna for the Coolgardie Gold Project. Prepared for Focus Minerals Ltd May 2022
3. Native Vegetation Solutions (2025). Reconnaissance Flora and Vegetation Survey of the Patricia Jean Project September 2024. Unpublished report prepared for Focus Minerals Limited.
4. Terratree (2022). Targeted Survey and Detailed Flora and Vegetation Survey (Ridge Area) – Coolgardie Gold Project September 2022. Unpublished report prepared for Focus Minerals Limited.
5. Western Ecological (2024). Basic Fauna Survey Patricia Jean Pit Project. Prepared for Focus Minerals Ltd October 2024.
6. Western Ecological (2025). Malleefowl Mound Monitoring – Patricia Jean Pit Addendum – Letter Report to Focus Minerals Ltd February 2025.

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1. Proposed Activities

Focus Operations Pty Ltd (Focus) is proposing to develop the Patricia Jean and Jolly Britain gold deposits within the Coolgardie Gold Central Operations (CGCO). This is an expansion of the CGCO which includes the CNX deposit which adjoins the application area to the east.

These Projects extract ore via open pit and underground mining for processing at the nearby Three Mile Hill (TMH) mill.

Focus will require clearing to commence the mining projects identified above. Clearing will be required for supporting mine activities including:

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

A Mining Development and Closure Proposal (MDCP) for the Projects will be submitted to Department of Mines Petroleum and Exploration (DMPE) in conjunction with other supporting approvals required under applicable legislation prior to commencement of activities.

1.1 Location

The operational area 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 Permit application area appears on eight 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	Holder 1	Holder 2	Granted	Expiry
L 15/130	Focus Minerals Ltd	Focus Operations Pty Ltd	21/02/1990	20/02/2030
L 15/177	Focus Minerals Ltd	Focus Operations Pty Ltd	08/09/1992	07/09/2027
L 15/283	Focus Minerals Ltd	Focus Operations Pty Ltd	04/09/2012	03/09/2033
M 15/630	Focus Minerals Ltd	Focus Operations Pty Ltd	14/02/1993	14/02/2035
M 15/636	Focus Minerals Ltd	Focus Operations Pty Ltd	16/06/1993	17/06/2035
M 15/781	Focus Minerals Ltd	Focus Operations Pty Ltd	12/06/2029	11/06/2031
M 15/827	Focus Minerals Ltd	Focus Operations Pty Ltd	12/06/2029	11/06/2031
M 15/1444	Focus Minerals Ltd	Focus Operations Pty Ltd	17/03/2010	16/03/2031

1.2 Clearing Envelope

Focus is requesting clearing of **250 ha** within the **536.5 ha** permit application area as depicted in **Figure 2** and **Figure 3** (Note: infrastructure layout is indicative and is subject to change).



Figure 1: Regional location

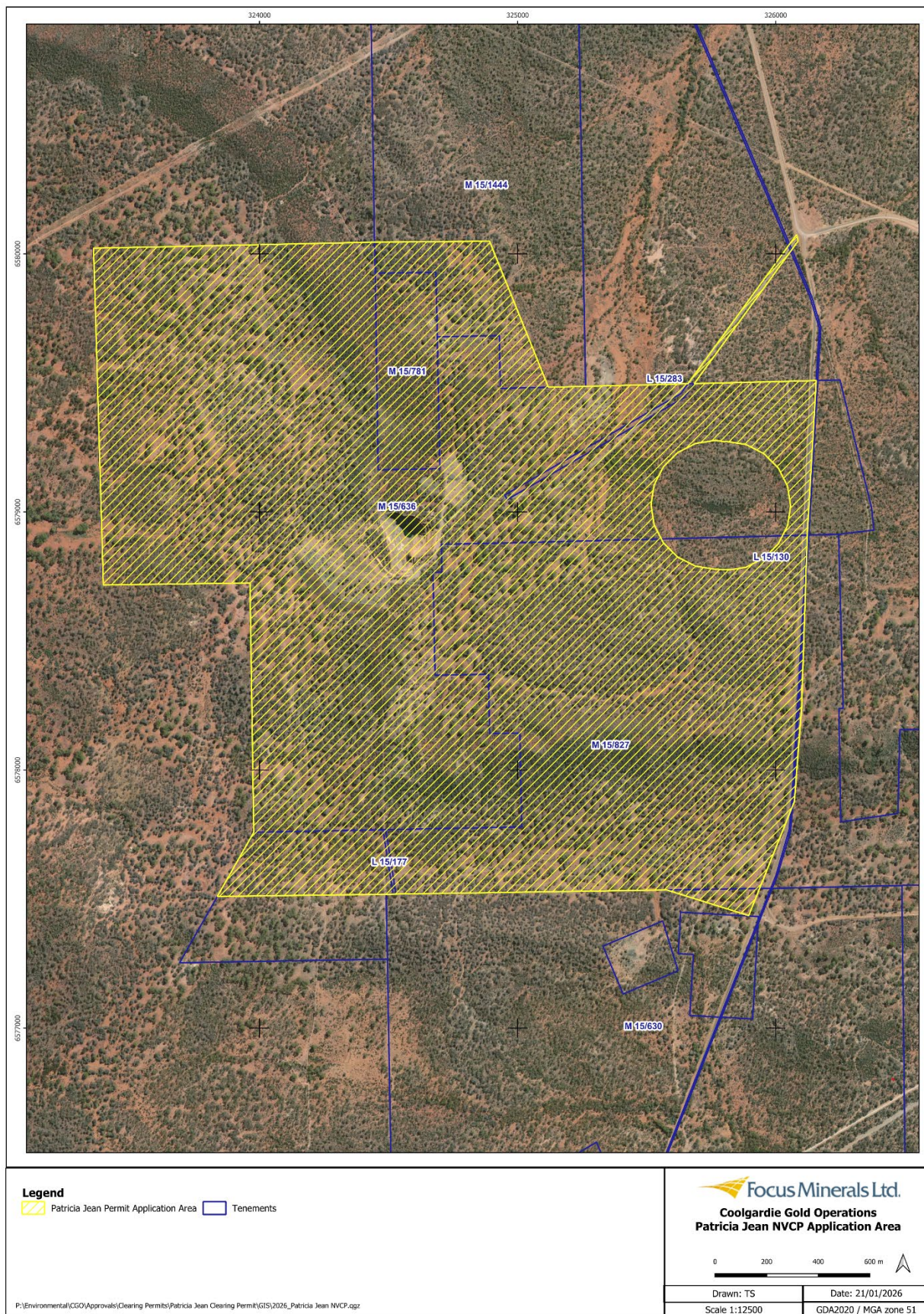


Figure 2: Patricia Jean Permit Application Area

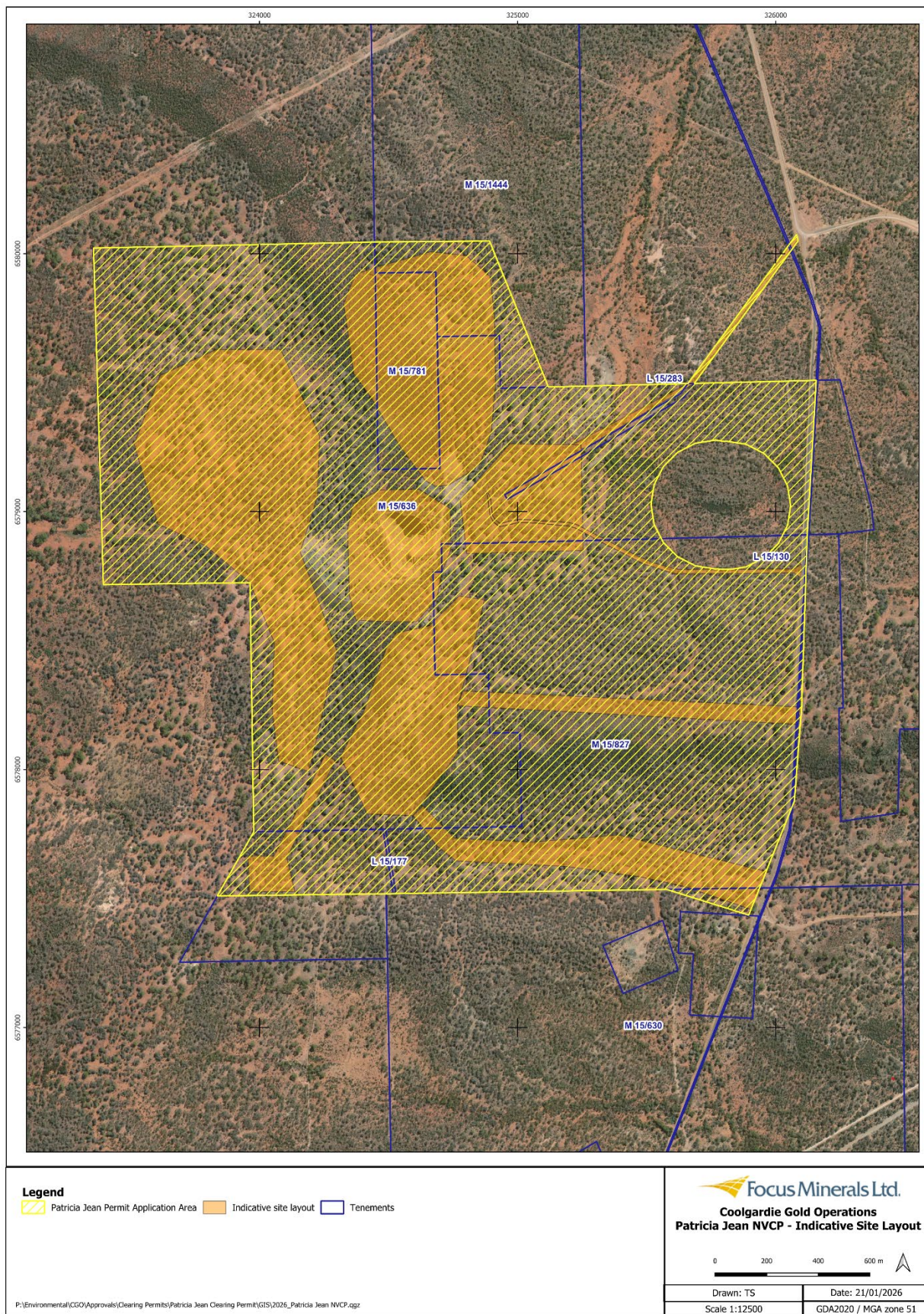


Figure 3: Indicative site layout

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). The nearest active Bureau of Meteorology (BoM) station to the project is Kalgoorlie–Boulder Airport (Station Number 12038) lies 33Km to the northeast of the Project. Climate data from the Kalgoorlie–Boulder Airport weather station is presented in **Figure 4** below.

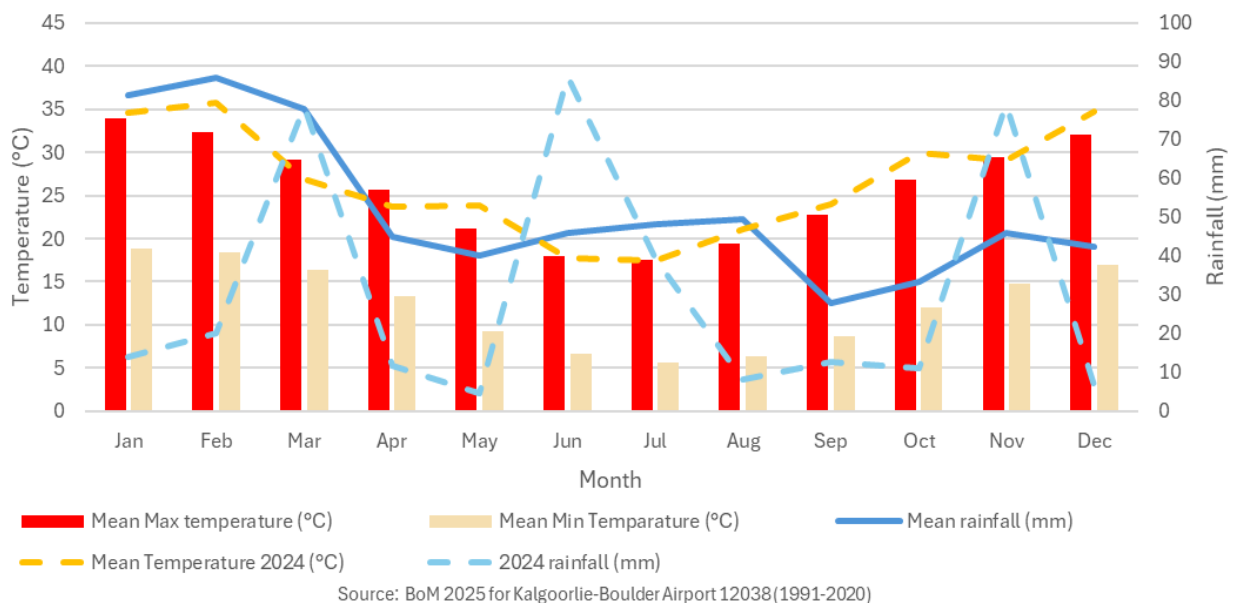


Figure 4: Coolgardie climate data (source: Bureau of Meteorology)

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 February 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 Permit application 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 granulites of the Fraser Range.

2.2.2 Land systems

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 permit application area overlies the area examined by Waddell and Galloway (2023) and mapped within the DPIRD–O27 layer. A summary of the land systems associated with the permit application area appear in Table 2 below.

Table 2: Land systems of the permit application area

Landsystem	Description	Ha within permit application area	Area in permit application area as % total of land system
Coolgardie Land System	Uplands and undulating plains associated with ultramafic greenstones, supporting eucalypt woodlands and halophytic shrublands	333.88	0.23
Coolgardie Disturbed land phase	Disturbed land	5.50	0.12
Gumland system	Extensive pedeplains supporting eucalypt woodlands with halophytic and non-halophytic shrub understoreys	6.38	0.001
Jaurdi Land System	Basalt hills and ridges, supporting acacia shrublands and scattered eucalypt woodlands with mainly non-halophytic understorey	176.38	1.46
Jaurdi Disturbed land phase	Disturbed land	14.36	3.70
TOTAL		536.5	



Figure 5: Land systems of the permit application area

2.2.3 Soils

The permit application area intersects soils as depicted in **Figure 6** (these delineations are consistent with land system boundaries shown in Figure 5). A summary of soil profiles from the broader Coolgardie operation have been recorded and are presented in **Table 3** with descriptions of soil characteristics following.

Table 3: Soil profile descriptions






Photo point	Landform	Soil profile	Vegetation
	Mid-slope very rocky open ground	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. >20cm: hardpan	60 to 70% open bare rocky ground with scattered eucalypt trees and low shrubs (0.3 to 1m)
	Minor gully – historical disturbance	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. >20cm: hardpan	Large eucalypts, medium shrubs and low shrub storey with 50% bare rocky ground
	Top of rocky knoll	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. >20cm: hardpan/competent rock	Scattered salmon gums and small Acacia trees (2 to 4m) with low storey of shrubs (0.5 to 1m)
	Disturbed (WRD footprint)	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. >20cm: hardpan	Bare rock ground with stands of Eucalyptus trees (6 to 8m) and shrubs 1 to 2m of height

Photo point	Landform	Soil profile	Vegetation
	<p>Disturbed (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>

Soil Structure

Strata within soils sampled in the broader project displayed characteristics of Emerson Classes 5 and 3b. Class 5 indicates a tendency for slaking but are not prone to dispersion of the clay element and are naturally stable. Class 3b indicates soils are not prone to slake in their natural state however may exhibit dispersion following severe disturbance. Care will therefore be required when managing these materials to minimise handling, especially when wet.

Soil Drainage

Soil samples from the environs of the Project showed moderately slow (C9) to moderately rapid (C12) drainage classes. This indicates that these soils may be susceptible to surface runoff erosion during high intensity rainfall events particularly where used on slopes of constructed landforms.

Soil pH

Soil pH (H₂O) measures the acidity or alkalinity of the soil in relation to suitability for plant growth. Ratings for soil pH are based on the Land Evaluation Standards for Land Resource Mapping categories (van Gool, 2005). Soil pH (H₂O) in the broader area is relatively consistently alkaline between pH 8.1 to 9.3.

Soil EC

Electrical conductivity (EC) is a measurement of the soluble salts in soils or water. Soil salinity results from natural processes of landscape evolution, hydrological processes and rainfall (Hunt & Gilkes, 1992). Individual EC values in soils ranges from 0.131 dS/m (non-saline) to 0.666 dS/m (moderately saline). Areas that have been subject to disturbance activities can exhibit higher salinities and can be rated as extremely saline.

Soil organic matter

The organic matter content of the soils within the broader area as a measure of the soil organic carbon percentage (SOC%) is low, as is typical of most highly weathered soils in the Goldfields, ranging between 0.71% and 1.93% in natural soils, the oxide waste material at point C12 showed a predictably lower organic component at 0.24%.

Exchangeable cations and exchangeable sodium percentage

Exchangeable cations, held on clay surfaces and within organic matter, are an important source of soil fertility and can influence the physical properties of soil. Soils within the broader area demonstrate reasonably consistent exchangeable cation concentration, effective cation exchange capacity and exchangeable sodium percentage with most soils identified as non-sodic. The ESP, exchangeable potassium, magnesium and sodium cation concentrations were very low. Exchangeable calcium is the dominant cation in previous test-work.

Soil Nutrients

The primary plant macro nutrients are; nitrogen (N), phosphorus (P), potassium (K) and sulphur (S). A summary of soils in the broader project area follows.

Nitrogen: plant available concentrations of organic nitrogen are highly variable but generally very low as is typical of highly weathered soils in the region.

Phosphorous: Plant-available P concentrations of the surface soils are variable but classified as low for all samples (<30 mg/kg (Moore, 1998)), which is typical for native soils in the region.

Potassium: The plant-available K concentrations of surface soils are variable, ranging from 91 mg/kg (medium) to 316 (368 C12) mg/kg (high) (Moore, 1998).

Sulphur: Plant-available S concentrations for surface soils range from 4.3 to 18.4 mg/kg. This range is considered low (<8 mg/kg) to high, based on target values for agricultural soils (DPIRD, 2021) however, are considered typical for native soils in the region.

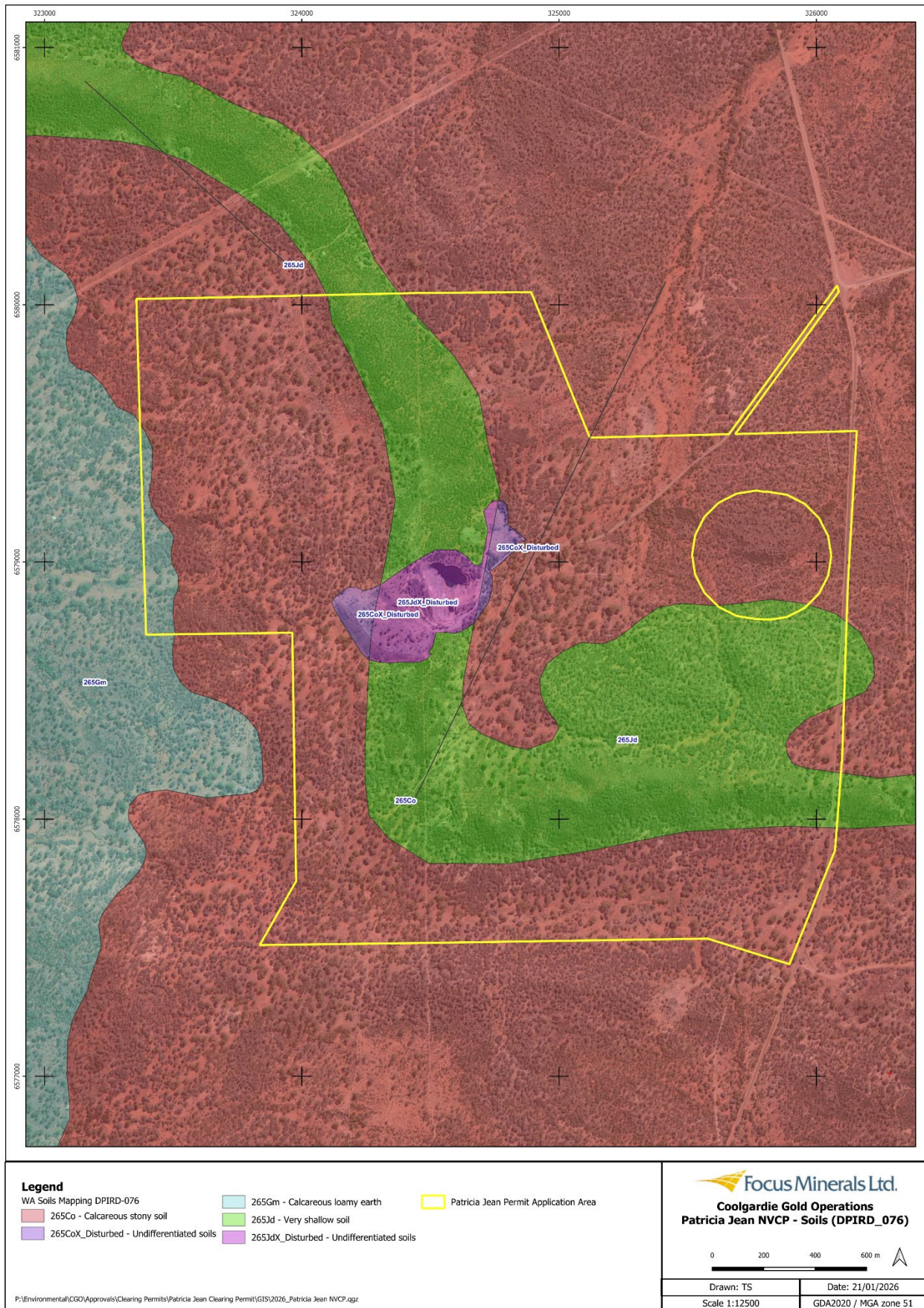


Figure 6: Soils of the permit application area

2.3 Biodiversity

2.3.1 Biological Surveys

Surveys conducted over the permit application area are summarised in Table 4 below. Surveys include both desktop and field assessments to determine the likelihood of significant vegetation flora and fauna within the Permit application 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 extents are shown **Figure 7**. Relevant biological surveys are provided in **Appendix B**.

Table 4: Biological surveys

Survey title	Fieldwork date	Limitations identified	Author / reference	IBSA Reference
CNX Three Mile Hill Coolgardie Gold Project – Biological Surveys (Flora, vegetation, fauna)	October – November 2021	Partial limitation for amphibians	360 Environmental	IBSA-2023-0524
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	None Identified	Invertebrate Solutions Pty Ltd	ISA-0001185
Targeted Survey and Detailed Flora and Vegetation Survey (Ridge Area) – Coolgardie Gold Project.	September 2022	None identified	Terratree	IBSA-2022-0108
Reconnaissance Flora and Vegetation Survey of the Patricia Jean Project	September 2024	None Identified	Native Vegetation Solutions	ISA-0001177
Basic Fauna Survey – Patricia Jean Pit Project and Malleefowl Mound assessment addendum	September 2024	None Identified	Western Ecological	ISA-0001126

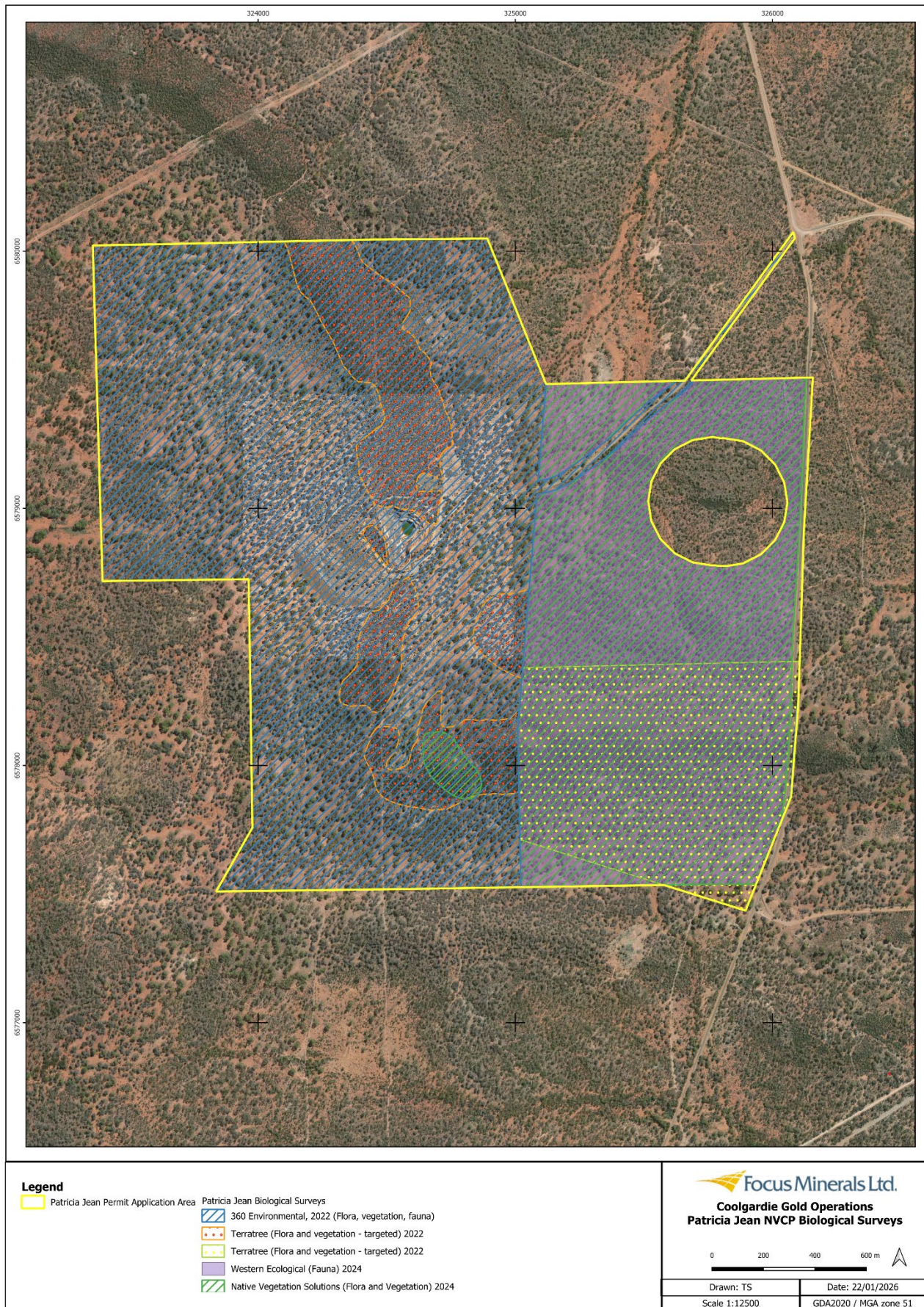


Figure 7: Biological surveys

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 understory 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 Permit application area is located within two vegetation associations. 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). The vegetation associations within the permit application area retain > 95% of their pre-European extent. Development within the permit application area will not significantly reduce the extent of pre-European vegetation associations or increase risk of loss. Vegetation association descriptions appear in Table 5 below and shown in **Figure 8**.

Table 5: 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.
Coolgardie 1294	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.



Figure 8: Pre-European vegetation associations

2.3.2.1 Vegetation Communities

Vegetation assessments were established via relevés or quadrats by 360 Environmental (2022), Terratree (2022) and Native Vegetation Solutions (2024). Vegetation communities within the Permit application area are described in **Table 6** below.

Table 6: 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
	EooEiiDs	Plains	<i>Eucalyptus oleosa</i> subsp. <i>oleosa</i> low open woodland over <i>Eremophila interstans</i> subsp. <i>interstans</i> mid isolated shrubs over <i>Dodonaea stenozyga</i> , <i>Eremophila glabra</i> subsp. <i>glabra</i> , and <i>Olearia muelleri</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>Dodonaea lobulata</i> (<i>Atriplex vesicaria</i> , <i>Ptilotus obovatus</i> var. <i>obovatus</i>) low shrubland
	Ec	Low slopes of rocky hills	<i>Eucalyptus celastroides</i> low woodland
	Cleared	Plains	Cleared or historically cleared areas including mine pits and borrow pits, 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 (2022) (continuous with 360 Environmental 2022 survey)	AcEoaDI	Rocky Ridgeline and slopes Greenstone (Ironstone/Dolerite) conglomerate rocks with quartz and red brown sandy clay loam	Tall Shrubland of <i>Acacia collegialis</i> – Tall shrubland of <i>Acacia collegialis</i> with patches of open mallee woodland of <i>Eucalyptus celastroides</i> , <i>Eucalyptus campaspe</i> , <i>Eucalyptus clelandiorum</i> on slopes with <i>Santalum spicatum</i> and isolated clumps of tall shrubland <i>Eremophila interstans</i> subsp. <i>interstans</i> , <i>Eremophila alternifolia</i> and <i>Santalum acuminatum</i> over mid shrubland <i>Eremophila georgei</i> , <i>Dodonaea microzyga</i> subsp. <i>acrolobata</i> and <i>Dodonaea lobulata</i> over low open shrubland of <i>Leiocarpa semicalva</i> subsp. <i>semicalva</i> , <i>Scaevola spinescens</i> , <i>Sida calyxhymenia</i> , <i>Ptilotus obovatus</i> and/or <i>Solanum lasiophyllum</i> over mixed open forbland of <i>Goodenia havilandii</i> , <i>*Carrichtera annua</i> , <i>Calotis hispidula</i> , <i>Panaetia lessonii</i> , <i>Roepera ovata</i> and <i>Cheilanthes sieberi</i> subsp. <i>sieberi</i> with isolated grasses of <i>Austrostipa eremophila</i> .

Survey Area	Name	Landscape position	Community description
	EsEiiAv	Flats with red brown/orange clay loam and patches of quartz pebbles	Open Forest to Isolated Trees of Eucalyptus salmonophloia – Open forest to isolated trees of <i>Eucalyptus salmonophloia</i> with sparse mallee woodland of <i>Eucalyptus campaspe</i> and <i>Eucalyptus celastroides</i> and/or <i>Eucalyptus clelandiorum</i> over isolated clumps of tall shrubland of <i>Pittosporum angustifolium</i> , <i>Pimelea microcephala</i> subsp. <i>microcephala</i> , <i>Eremophila scoparia</i> , <i>Senna artemisioides</i> subsp. <i>filifolia</i> and/or <i>Atriplex nummularia</i> subsp. <i>spathulata</i> over mid to low open shrubland of <i>Atriplex vesicaria</i> and <i>Scaevola spinescens</i> .
	EsppEiiSaa	Plains and gentle slopes with red brown sandy clay loam with patches of ironstone/ quartz or basalt pebble mantle.	Mixed Eucalypt Open Woodland – Open mallee woodland of <i>Eucalyptus campaspe</i> and <i>E. celastroides</i> with open woodland of <i>Eucalyptus clelandiorum</i> with patches of open woodland of <i>Eucalyptus griffithsii</i> over Isolated clumps of tall shrubland of <i>Eremophila interstans</i> subsp. <i>interstans</i> , <i>Senna artemisioides</i> subsp. <i>filifolia</i> , <i>Eremophila alternifolia</i> and/or <i>Eremophila scoparia</i> over sparse mid shrubland of <i>Atriplex nummularia</i> subsp. <i>spathulata</i> , <i>Dodonaea lobulata</i> , <i>Eremophila glabra</i> subsp. <i>glabra</i> , <i>Scaevola spinescens</i> and/or <i>Pimelea microcephala</i> subsp. <i>microcephala</i> over sparse low shrubland of <i>Atriplex vesicaria</i> , <i>Olearia muelleri</i> , <i>Acacia erinacea</i> and/or <i>Hemigenia teretiuscula</i> often with isolated clumps of grasses <i>Austrostipa elegantissima</i> and <i>*Rostraria pumila</i> with isolated clumps of forbs of <i>*Carrichtera annua</i> and other native ephemerals; <i>Calotis multicaulis</i> , <i>Senecio glossanthus</i> , and <i>Minuria cunninghamii</i> .
Native Vegetation Solutions (2024)	A	-	<i>Eucalyptus campaspe</i> over chenopod shrubland
	B	-	Transitional <i>Eucalyptus</i> woodland
	C	-	<i>Acacia quadrimarginea</i> over mixed sclerophyll shrubland
	D	-	Open <i>Eucalyptus salmonophloia</i> woodland
	E	-	<i>Eucalyptus griffithsii</i> over mixed sclerophyll shrubland
	F	-	<i>Acacia acuminata</i> thicket with occasional <i>Eucalyptus griffithsii</i>
	G	-	Open shrubland
	NA	-	Existing Disturbance

2.3.2.2 Vegetation Condition

Some areas within the permit application area have been subject to disturbance, including historical small and large scale mine excavations, makeshift tracks, cattle grazing, weeds and litter. Vegetation condition within the permit application area was predominantly rated Good but ranged from Excellent to Completely Degraded (where all vegetation had been cleared) with

reference to the Keighery (1994) scale. **Table 7** presents the approximate proportion of area in relation to vegetation condition.

Table 7: Vegetation Condition

Vegetation Condition	Area (ha)	Proportion (%)
Excellent	293	55%
Very Good	165	31%
Good	55	10%
Completely Degraded / Disturbed	23	4%

2.3.2.3 Significant Vegetation

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

The nearest Environmentally Sensitive Area (ESA) is the Rowles Lagoon Conservation Park, located approximately 55km north-west of the permit application area.

The permit application area is not located within any listed conservation areas. The nearest conservation area is Kangaroo Hills Timber Reserve, which is situated approximately 5km south-west of the permit application area.

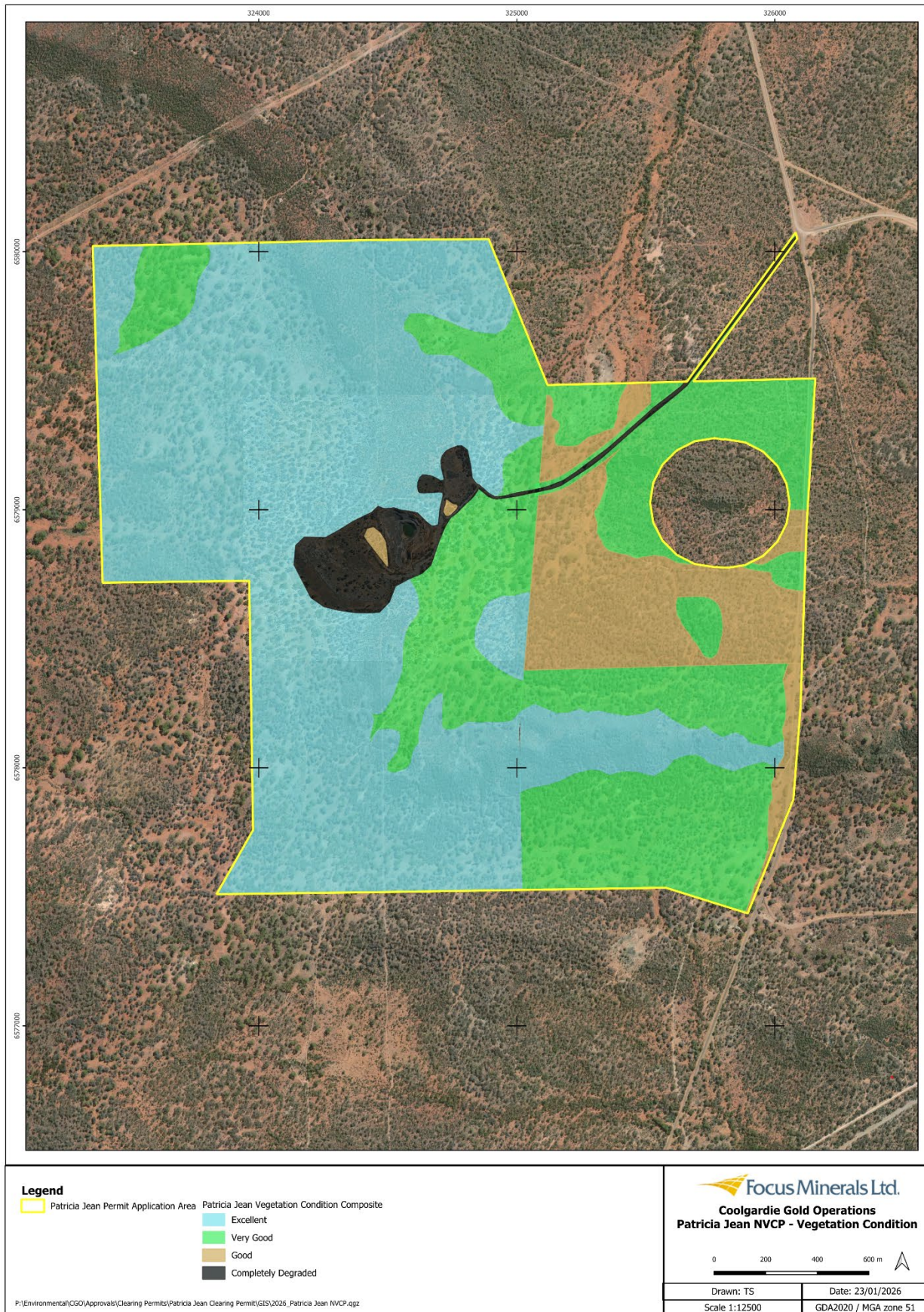


Figure 9: Vegetation condition

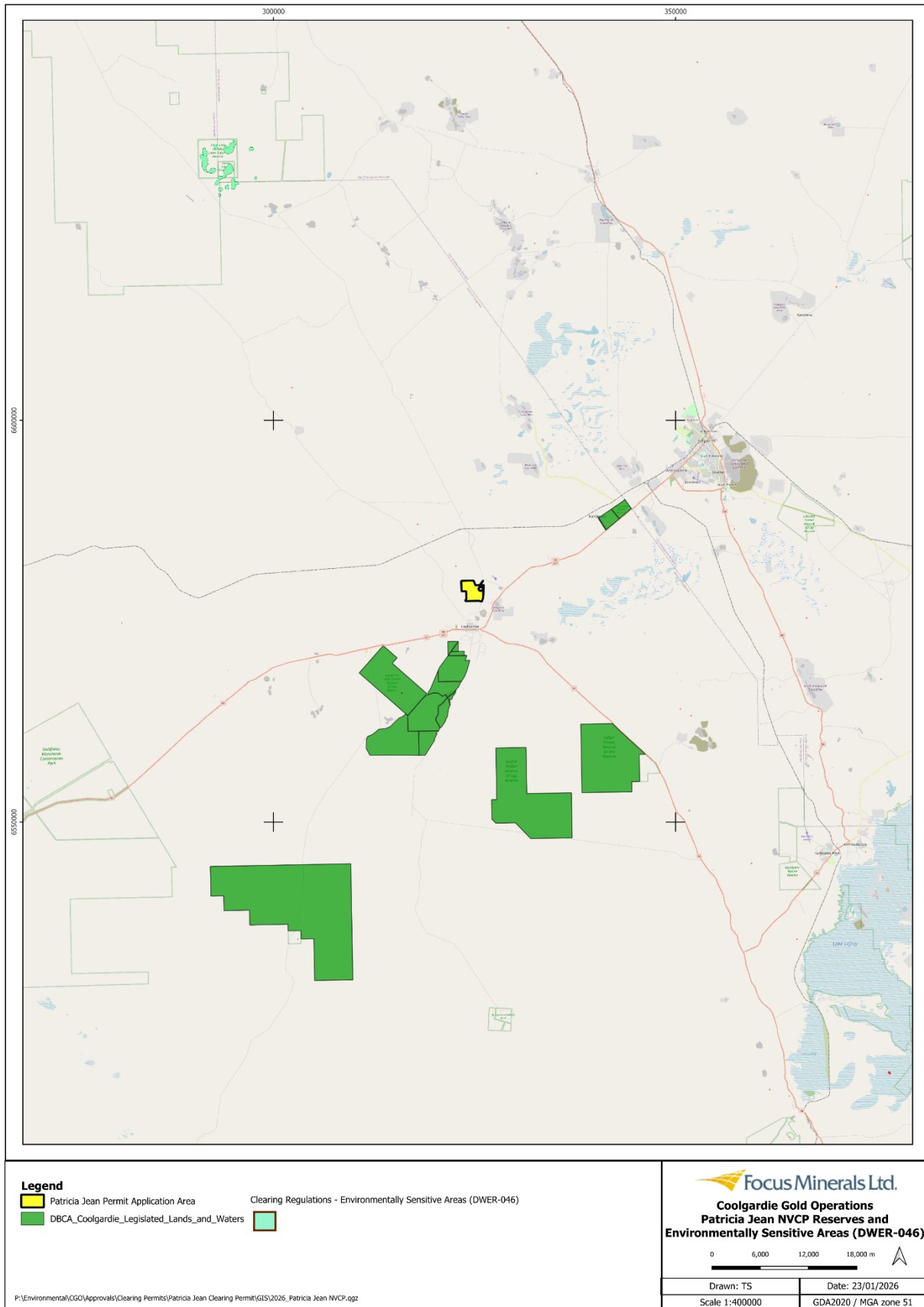


Figure 10: Environmentally sensitive areas

2.3.3 Flora

360 Environmental (2022) surveyed a broader area including Bonnievale, Brilliant, CNX, Three Mile Hill, Lady Loch, Perseverance, Dreadnought and Alicia permit application areas and, accordingly, the larger number of taxa identified (149) includes species from outside the Permit application 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 (2022) also surveyed a within the Patricia Jean permit application area, identifying a total of 88 species across 29 families.

Native Vegetation Solutions (2024) addressed areas formerly covered by Terratree and additional area, identifying a total of 94 taxa across 27 families.

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 8** below.

Table 8: 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 (2022)	88	-	29	-	<i>Chenopodiaceae</i> (13 taxa) <i>Myrtaceae</i> (8 taxa) <i>Scrophulariaceae</i> (7 taxa)
Native Vegetation Solutions (2024)	94	52	27	-	<i>Chenopodiaceae</i> (19 taxa) <i>Scrophulariaceae</i> (10 taxa) <i>Myrtaceae</i> (9 taxa)

*includes areas outside of the Permit application area within broader CGO survey area

2.3.3.1 Threatened and Priority Flora

Based on the most recent database search (DBCA 2023 by Native Vegetation Solutions 2024), a total of 23 flora species of conservation significance had possibility of occurring within 20 km radius of the Permit application area. These comprised one Threatened taxa, nine Priority 1, four Priority 2, seven Priority 3 and two Priority 4 species. A likelihood of occurrence assessment appears in Appendix 2 of Native Vegetation Solutions (2024).

No Threatened (Declared Rare) flora or Ecological Communities (TECs or PECs) were recorded during field surveys of the permit application area. One Priority flora, *Eremophila praecox* (P2) was recorded within the permit application area.

2.3.3.2 Introduced Flora

A total of 14 introduced flora species were recorded in the various flora and vegetation surveys of the permit application area. A summary of introduced flora identified are provided in **Table 9** below.

One Weed of National Significance (WoNS) was identified in the permit application area, *Opuntia stricta*; restricted to isolated occurrences.

Table 9: Introduced flora in the permit application area

Species name	Common name	WoNS
<i>Asphodelus fistulosus</i>	Onion Weed	No
<i>Carrichtera annua</i>	Ward's Weed	No
<i>Centaurea melitensis</i>	Maltese Start Thistle	No
<i>Cuscuta planiflora</i>	Red Dodder	No
<i>Dittrichia graveolens</i>	Stinkwort	No
<i>Lysimachia arvensis</i>	Pimpernel	No
<i>Medicago laciniata</i>	Tattered Medic	No
<i>Medicago minima</i>	Wooly Burr Medic	No
<i>Oligocarpus calendulaceus</i>	-	No
<i>Opuntia stricta</i>	Common Prickly Pear	Yes
<i>Rostraria pumila</i>	Roughtail	No
<i>Rumex vesicarius</i>	Ruby Dock	No
<i>Salvia verbenaca</i>	Wild Sage	No
<i>Sonchus oleraceus</i>	Milk Thistle	No

2.3.4 Fauna

Fauna surveys over the Permit application area have included basic fauna assessments (previously known as level 1 fauna assessments), targeted survey for Malleefowl 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 10** below.

Table 10: 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
Western Ecological (2024)	423	22	0	19	2	1


*includes areas outside of the Permit application area within broader CGO survey area

2.3.4.1 Fauna habitat

Broad fauna habitats have been mapped in the Permit application 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 11** below.

Table 11: 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. Malleefowl may forage in this habitat.	
	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. Malleefowl may forage in this habitat but unlikely to nest in the habitat due to rocky substrate.	
	Cleared areas	Cleared or historically cleared areas including mine pits and borrow pits (often filled with water), bitumen roads, and dirt tracks	
Western Ecological (2024)	Mixed Eucalyptus Woodland	Mallee Eucalyptus woodland consisting of mixed eucalypts including <i>Eucalyptus salmonophloia</i> , <i>E. griffithsii</i> , <i>E. torquate</i> , <i>E. clelandiorum</i> and <i>E. Campaspe</i> over scattered tall shrubs of <i>Acacia</i> , <i>Eremophila</i> and <i>Senna</i> on sandy flats or low hill slopes	
	Rocky Ridge	Rocky Ridge habitat consisted primarily of mixed <i>Acacia</i> and <i>Eremophila</i> tall shrubs, over mixed herbs on high rock ridges	

Survey	Habitat type	Description	Example image
	Acacia Shrubland	Acacia Shrubland habitat consisted of dense mixed Acacia shrubs, over sparse mixed grasses on sandy soils. This is suitable nesting habitat for Malleefowl.	

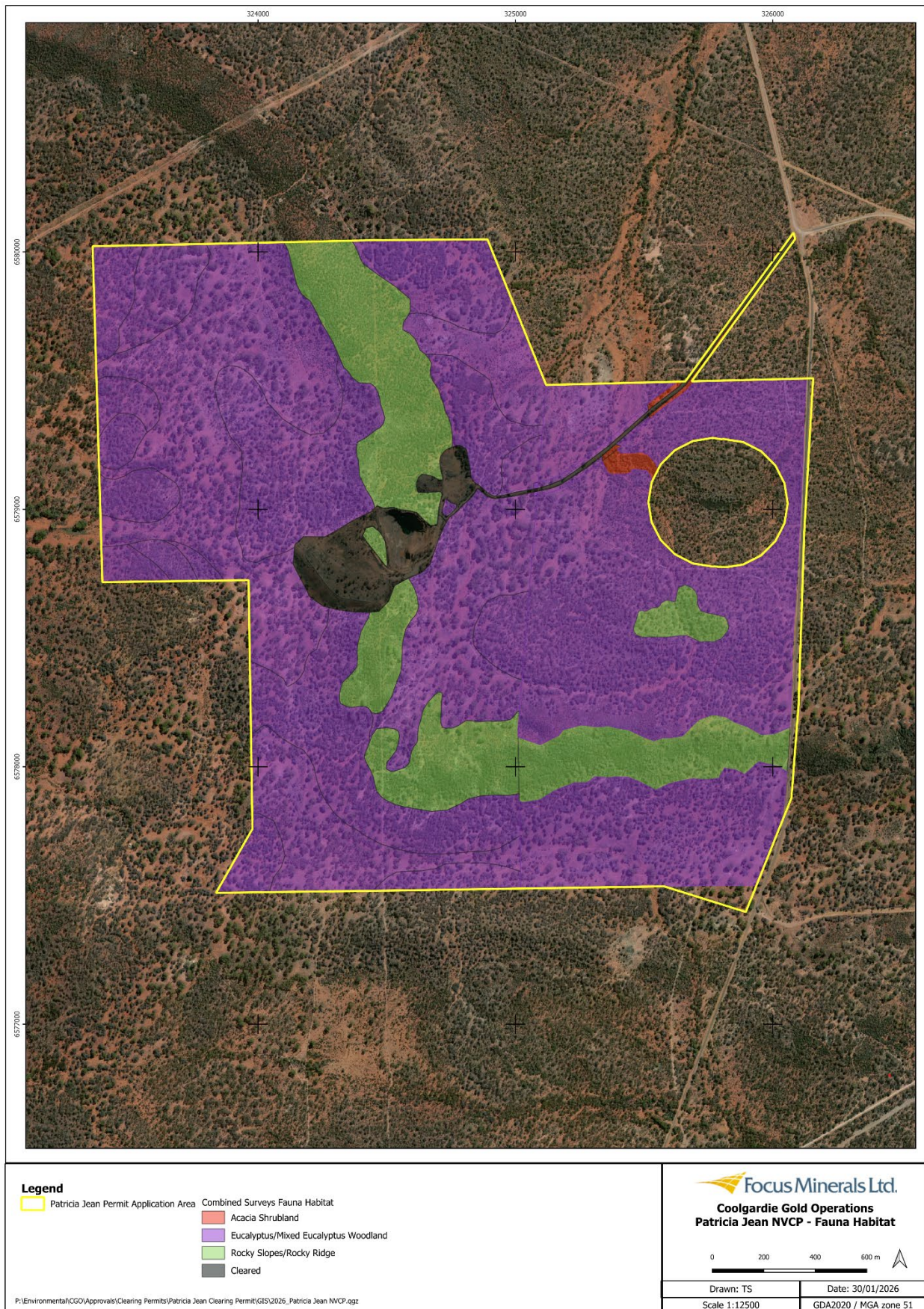


Figure 11: Fauna Habitat of the permit application area

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 Permit application area.

Malleefowl were recorded during the Western Ecological (2024) survey within the permit application area. Acacia Shrubland habitat is suitable for nesting and the other habitat types are suitable for foraging. A comprehensive assessment of the Malleefowl mounds was completed (by Western Ecological) with camera trapping over ~4 months from September 2024 documenting a nesting pair at the active mound location within Acacia Shrubland habitat. The mound locations have been excluded from the permit application area with a 250-metre buffer.

Suitable habitat exists within the permit application area for the Inland Hairstreak *Jalmenus aridus*, and Arid Bronze Azure Butterfly *Ogyris subterrestris petrina* (ABAB). The Inland Hairstreak has a breeding population approximately 7 km south-west of the permit application area, characterised by open woodland with mature *Senna artemisioides* ssp. *filifolia* as well as mixed flowering shrubs with open areas of well drained. The ant *Froggattella kirbii* must be present (Eastwood *et.al.*, 2023). This habitat appears within the permit application area.

The ABAB has an association with mature smooth barked Eucalypts and the sugar ant *Camponotus* sp. nr. *terebrans*. While smooth barked Eucalypts appear within the permit application area, broader surveys within the Coolgardie area have not uncovered any new populations of ABAB and an absence of *Camponotus terebrans* ants.

While Chuditch was recorded at the time of 360 Environmental survey (from a scat) this has since been recanted as a mistaken scat identification by subsequent correspondence between Focus and DMPE. Explanation and correspondence regarding this record appear attached as **Appendix C**.

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 12** below. Where habitat does not exist (ephemeral wetland/marsh) species with records in proximity to the permit application area have been provided a low likelihood of occurrence.

Table 12: Significant fauna likelihood of occurrence

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.	Recorded
<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.	Unlikely

Species name	Common name	Conservation status		Assessment	Likelihood
		EPBC Act	BC Act		
<i>Dasyurus geoffroii fortis</i>	Chuditch	VU	VU	A scat was found within the 360 Environmental survey area which was identified in the field as Chuditch (later discounted). On review the consulting ecologist decided that although suitable habitat was present, given the known distribution of this species its presence at this site is unlikely.	Unlikely
<i>Jalmenus aridus</i>	Inland Hairstreak		P1	Suitable habitat present within the survey area, more recent records within 7 km of permit application area.	Possible
<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.	Unlikely
<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.	Unlikely
<i>Falco peregrinus</i>	Peregrine Falcon	-	OS	Two records from 2013 and 2014 70km from the survey area. There is a lack of wooded watercourses and rivers required for hunting.	Unlikely
<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.	Unlikely
<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.	Unlikely
<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.	Unlikely
<i>Pezoporus occidentalis</i>	Night Parrot	EN	CR	No records within 100km of the survey area. No suitable habitat within the survey area.	Unlikely
<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.	Unlikely
<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.	Unlikely
<i>Calidris alba</i>	Sanderling	MI, MA	IA	Nearest record in Kalgoorlie. No suitable habitat within the survey area.	Unlikely
<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.	Unlikely

Species name	Common name	Conservation status		Assessment	Likelihood
		EPBC Act	BC Act		
<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.	Unlikely
<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.	Unlikely
<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.	Unlikely
<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.	Unlikely
<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.	Unlikely
<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.	Unlikely
<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.	Unlikely
<i>Macrotis lagotis</i>	Bilby	VU	VU	No nearby records. No suitable habitat present.	Unlikely

*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, OS – Other Specially Protected, IA/MI – Migratory, MA – Marine, P – Listed as Priority by DBCA.

2.3.4.3 Short Range Endemics

Habitat types in the Permit application 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 Permit application area.

2.3.4.4 Subterranean fauna

Invertebrate Solutions (2022) undertook a desktop assessment for subterranean fauna (stygo fauna and troglo fauna) for CGO, including parts of the Permit application area. A combination of regional information, geological, hydrogeological and database searches were used to inform likelihood of subterranean fauna in the permit application 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, 2022).

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. The Western

Ecological Survey (2024) identified one introduced species (*Oryctolagus cuniculus*), while also capturing dingoes during Malleefowl mound camera trapping in 2024. A summary of introduced fauna is in **Table 13** below.

Table 13: 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>	Dingo/Dog
	<i>Vulpes vulpes</i>	Red fox
	<i>Equus caballus</i>	Horse
	<i>Felis catus</i>	Cat
	<i>Oryctolagus cuniculus</i>	Rabbit

2.4 Surface Hydrology

The permit application area lies across a catchment divide for the Raeside–Ponton and Lake Lefroy catchments, that locally drain north and west; and south–east respectively (see Figure 12). 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.

Clearing within watercourses is likely to have minor impacts to these ephemeral drainage lines. Being at the top of the catchment, it is likely that drainage diversion infrastructure requirements will be minimal to ensure that flood risks to the Project are mitigated whilst preserving natural flow paths.

Significant water bodies in the regional vicinity of the project include the ephemeral lakes, Brown Lake (8.5 km east), Kurrawang Lake (12 km north), Red Lake (14 km east), White Lake (18 km east) and Lake Douglas (26 km northeast).

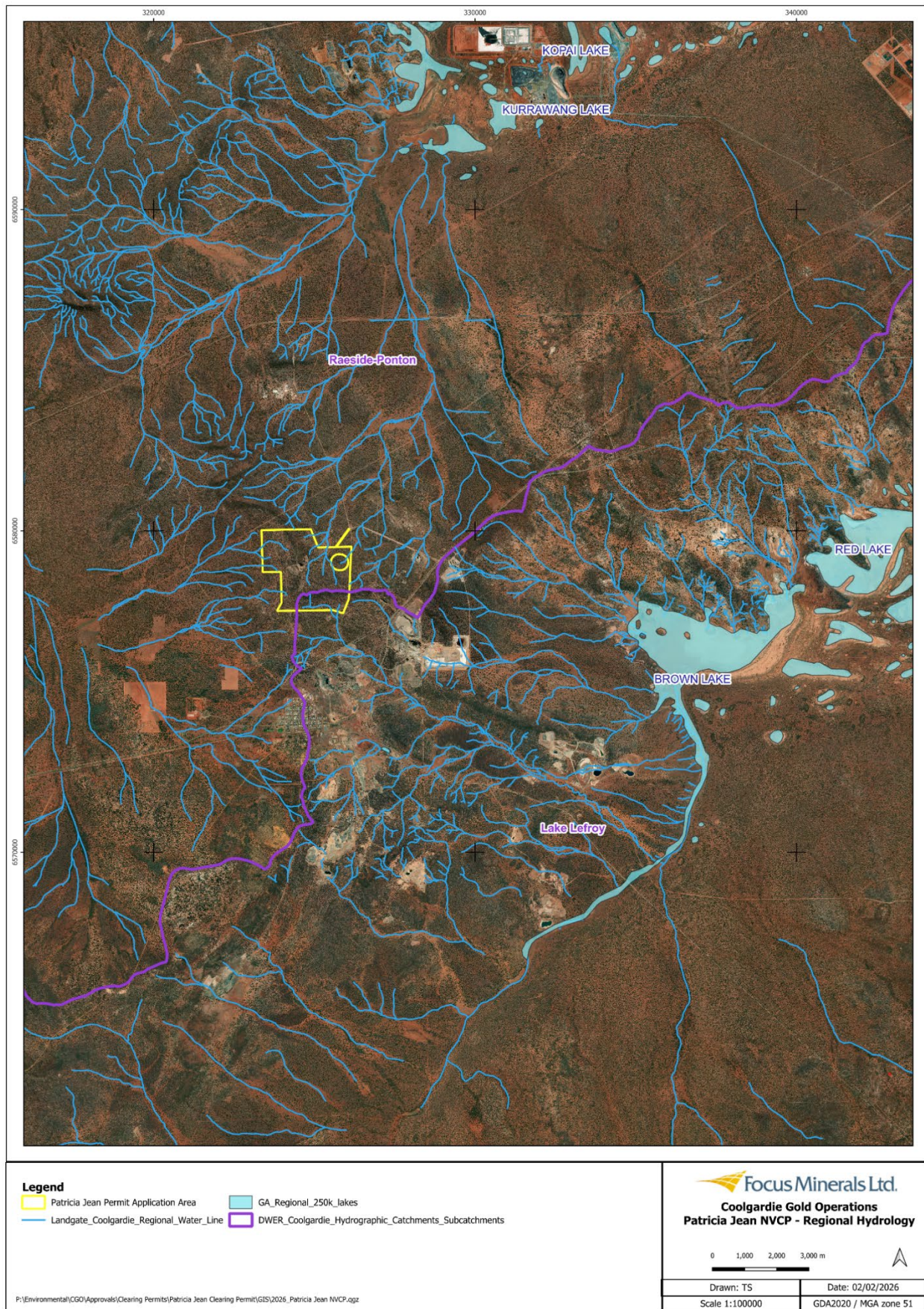


Figure 12: Regional surface water flows

2.5 Heritage

2.5.1 Native Title

There is no Native Title Determination across the Permit application area at present.

There is one registered Native Title claim over the Permit application area, Marlinyu Ghoorlie Claim (WC2017/007). It is expected that this claim will be determined in the near future and to this end Focus has negotiated an agreement with the Marlinyu Ghoorlie Native Title Claimant group.

2.5.2 Aboriginal Heritage

A search of DPLH Aboriginal Cultural Heritage Inquiry System (ACHIS) in August 2025 identified that no Registered or Lodged Aboriginal Heritage Sites intersect with the permit application area.

One lodged place; Roundhead/Ngumarn, lies 830 metres south of the application area. The closest registered sites are Mingarri, 2,300 metres north-west of the application area; Kurrkurti, 2,500 metres south of the application area; and Kurkutjutana, 3,000 south of the application area.

A summary of relevant Heritage Places is provided in **Table 14** and the location of Aboriginal Site DPLH boundaries is shown in **Figure 13**.

Table 14: Summary of Aboriginal Heritage Sites

Site Name	Place ID	Description
Roundhead/ Ngumarn	32761	Ceremonial, Mythological, Rockshelter, Birth Place, Camp, Hunting Place, Meeting Place, Natural Feature, Plant Resource – Female access only
Mingarri	1487	Mythological, camp, water source – No gender restrictions
Kurrkurti	1475	Ceremonial, Water Source – No gender restrictions
Kurkutjutana	3009	Ceremonial, Mythological, Camp, Meeting Place, Plant Resource, Water Source – No gender restrictions

Based on the above information, and confidential surveys and correspondence maintained by Focus, it is determined that the proposed operations will not detrimentally affect any of these Aboriginal heritage sites or 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.

2.5.3 European Heritage

A search of State Heritage Office inHerit database in January 2026 showed no Statutory Heritage Listings in vicinity of the permit application area. The closest was recorded as Toorak Hill Reservoir, 1,450 metres to the south of the application area.

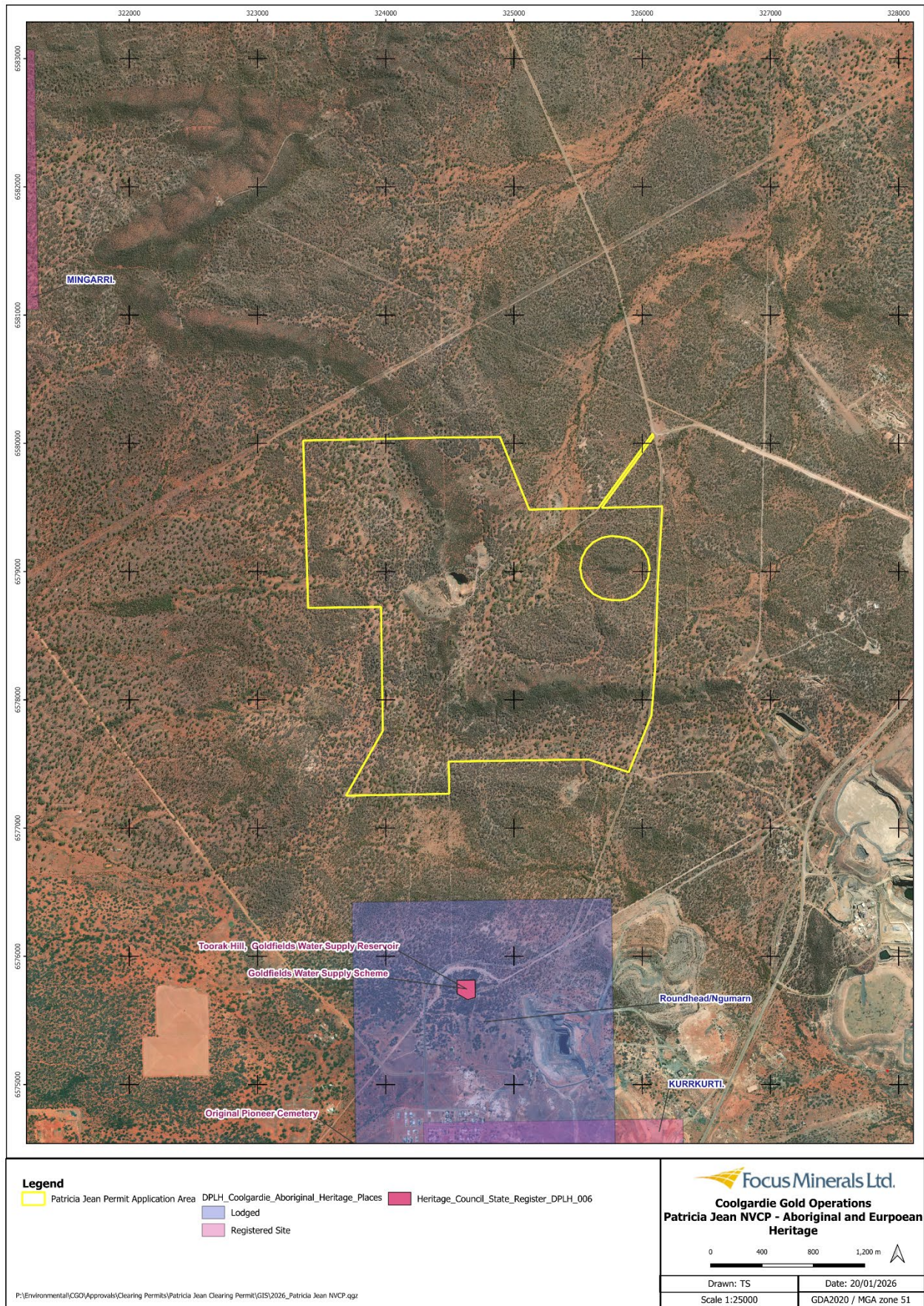


Figure 13: Aboriginal and European heritage

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 15** below.

Table 15: 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 Permit application area is not considered to comprise a high level of biological diversity as vegetation is typical of the surrounding region. The vegetation within the Permit application 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. An active mound identified within survey areas was excluded from the permit application area – providing a 250-metre buffer of vegetation around the location. In considering local and regional records, Malleefowl have a wide range and habitat present within the Permit application area is contiguous with habitat outside the Permit application area. Proposed clearing is unlikely to impact on the maintenance of suitable habitat 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) species were recorded in the Permit application area during any of the vegetation and flora surveys. A single record of Priority 2 species, <i>Eremophila praecox</i> (P2) was identified within the permit application area. While unlikely to be cleared, removal of the single plant will not have a significant impact on the conservation status of this taxa.	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 Permit application 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 Permit application area includes pre-European vegetation association Coolgardie 9 and Coolgardie 1294 with remaining extents of >95% across the Coolgardie Bioregion. The clearing represents a minor portion of vegetation in an area well connected to surrounding vegetation. Removal of vegetation will not reduce the extent of the pre-European vegetation association to less than 95 %.	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 Permit application area. Minor ephemeral surface water flow paths exist through the Permit application 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 permit application area contains a proportion of historic mining disturbance and newer exploration disturbance. Following completion of the Project, activities will be rehabilitated in accordance with an approved MDCP and respective Mine Closure Plan.</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 Permit application area. The nearest ESA is Rowles Lagoon, located approximately 68 km northwest, and the nearest conservation area is Kangaroo Hills Timber Reserve, located approximately 7 km to the south-west of the permit application area.</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 Permit application area. Groundwater in the region is hypersaline and has limited uses outside of the mining industry. Groundwater recharge is slow and is unlikely to 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 delineated by a ridge that forms a catchment divide within the permit application area.</p> <p>Ephemeral drainage lines in the Permit application 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. Clearance Mitigation Hierarchy

4.1 Avoidance

4.1.1 Design

The mine site layout will be designed to prioritise use of previously disturbed areas, in preference to clearance of native vegetation. The indicative disturbance areas within this application target the previously cleared locations (pit, waste dump, access tracks and historic exploration activities) to reduce the size and scale of new clearing.

Clearing areas will be kept to the minimum required for mine activities and undertaken progressively as required.

4.1.2 Process

Prior to any clearing, a surface disturbance permit (FML-ENV-FORM-02) will be authorised by Focus' environmental department to ensure clearing is coordinated and 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*).

4.1.3 Methodology

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.

Vegetation will be cleared by mechanical clearing. Equipment required to undertake and support clearing activities may include a combination of:

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

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.

4.2 Mitigation

An Environmental Management Plan (EMP) for CGO is in force and subject to continuous improvement. This 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.

4.2.1 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.

4.2.2 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.

4.2.3 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:

- Mallefowl exclusion zone to ensure nesting habitat preserved;
- 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, thereby deterring invasive fauna species; and
- Personnel are prohibited from direct contact with fauna, including feeding.

4.2.4 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.

4.2.5 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.

4.2.6 Rehabilitation

Rehabilitation of cleared areas will occur in accordance with the CGO Mine Closure Plan (MCP) which will be revised to include the Project and will be submitted in accordance with the Approvals Statement for this Project.

5. References

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Western Ecological (2024). Basic Fauna Survey Patricia Jean Pit Project. Prepared for Focus Minerals Ltd October 2024.

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6. Appendices

Appendix A: Proof of ownership

Appendix B: Biological surveys

7. 360 Environmental (2022) CNX Three Mile Hill Coolgardie Gold Project Biological Surveys. Prepared for Focus Minerals Ltd June 2022.
8. Invertebrate Solutions (2022). Desktop Assessment for Subterranean Fauna for the Coolgardie Gold Project. Prepared for Focus Minerals Ltd May 2022
9. Native Vegetation Solutions (2025). Reconnaissance Flora and Vegetation Survey of the Patricia Jean Project September 2024. Unpublished report prepared for Focus Minerals Limited.
10. Terratree (2022). Targeted Survey and Detailed Flora and Vegetation Survey (Ridge Area) – Coolgardie Gold Project September 2022. Unpublished report prepared for Focus Minerals Limited.
11. Western Ecological (2024). Basic Fauna Survey Patricia Jean Pit Project. Prepared for Focus Minerals Ltd October 2024.
12. Western Ecological (2025). Malleefowl Mound Monitoring – Patricia Jean Pit Addendum – Letter Report to Focus Minerals Ltd February 2025.

Appendix C: Chuditch mis-identification correspondence

Appendix A: Proof of ownership

Appendix B: Biological surveys

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