



13 June 2026

ACN: 112 287 797

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Dear Sir/Madam,

RE: Native Vegetation Clearing Permit Application for Racetrack Project

Norton Gold Fields Pty Ltd (Norton) are proposing to develop a cutback of Racetrack open pit, including development of new waste rock landforms and other supporting mine activities located approximately 15 km south-west of Broad Arrow and 30 km north-west of Kalgoorlie-Boulder. To support development, Norton are seeking a Native Vegetation Clearing Permit for clearing of up to 480 ha, within a clearing envelope of 3336.45 ha for the purpose of mineral production and associated activities.

This letter provides context for proposed clearing and includes an assessment against the ten clearing Principles, as defined under Schedule 5 of the *Environmental Protection Act 1986*. The proposed clearing is unlikely to be at variance with any clearing principle.

Included within this letter are:

- A completed NVCP application form (NV-F01) (provided separately);
- An ESRI shapefile of the proposed clearing envelope / clearing permit area (provided separately);
- Proof of ownership (Appendix A); and
- Relevant surveys undertaken to support the application (Appendix B, C D and E)

If you have any questions, please contact me on [REDACTED] or via email at [REDACTED]

Yours sincerely,

Revision Summary

Document Name	Racetrack Native Vegetation Clearing Permit Application			
Document Number	AC26-NGF-08(01)			
Revision	Date	Author	Reviewer	Comments
0.1	24/02/2026	M. Holmes	T.Laatz	Draft issued to client
0.2	10/03/2026	M. Holmes	T.Laatz	Final issued to client
1.0	17/03/2026	M. Holmes	T.Laatz	Final document submission
1.1	13/06/2026	T. Laatz	C. Woods	Amendment to address RFI

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1 Proposed Activities

Norton Gold Fields Pty Ltd ('Norton') is one of Australia's largest domestic gold producers, with recent annual productions of up to 260,000 ounces. The company holds a tenement package of more than 1,000 square kilometres (km²) surrounding the 3.8 million tonne per annum (Mtpa) Paddington Mill, 35 kilometres (km) north of Kalgoorlie–Boulder in the Eastern Goldfields region of Western Australia (WA). The Racetrack Project is a brownfields project, located approximately 13 km west of Paddington Mill, with ore being trucked to the mill for processing. Norton are proposing to expand the Racetrack Project (the project), with a significant cutback of Racetrack pit, commencing in 2027, including development of new waste rock landforms and other supporting mine activities.

The Racetrack project will consist of the following disturbances:

- Mining voids;
- Waste dump or overburden stockpiles;
- Run-of mine pad;
- Laydown or hardstand areas;
- Topsoil stockpiles; and
- Transport or service infrastructure corridors.

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

1.1 Location

The Project is located approximately 15 km south-west of Broad Arrow and 30 km north-west of Kalgoorlie–Boulder, in the Goldfields Region of Western Australia and lies within the City of Kalgoorlie Boulder local government area. Majority of the project is situated on Black Flag Pastoral Station and smaller sections on unallocated crown land. The project is accessed via Black Flag–Ora Banda Road. The Project's regional location is shown in **Figure 1**.

Project tenements are held by Paddington Gold Pty Limited, a wholly owned subsidiary of Norton Gold Fields Pty Ltd.

The Project requires clearing on **twenty-four (24)** tenements as detailed in **Table 1** below. Proof of ownership of these tenements is provided in Appendix A.

Table 1: Project Tenements

Tenement	Legal Area (ha)	Holder	Commence	Expiry
M24/79	9.602	Paddington Gold Pty Limited	28/01/1987	27/01/2029
M24/80	4.498	Paddington Gold Pty Limited	12/12/1986	31/10/1985
M24/82	82.735	Paddington Gold Pty Limited	12/02/1986	11/02/2028
M24/102	643.1	Paddington Gold Pty Limited	16/12/1986	15/12/2028
M24/155	385.375	Paddington Gold Pty Limited	06/08/1987	05/08/2029
M24/165	892.85	Paddington Gold Pty Limited	24/12/1987	23/12/2029
M24/166	473.5	Paddington Gold Pty Limited	09/02/1988	08/02/2030
M24/182	141.15	Paddington Gold Pty Limited	14/03/1988	13/03/2030
M24/223	136.05	Paddington Gold Pty Limited	14/03/1988	13/03/2030
M24/227	77.89	Paddington Gold Pty Limited	27/07/1988	26/07/2030
M24/234	370.55	Paddington Gold Pty Limited	13/06/1988	12/06/2030
M24/236	121.85	Paddington Gold Pty Limited	13/06/1988	12/06/2030
M24/256	110.55	Paddington Gold Pty Limited	04/11/1988	03/11/2030
M24/265	264.3	Paddington Gold Pty Limited	02/09/1988	01/09/2030
M24/266	122.75	Paddington Gold Pty Limited	29/09/1988	28/09/2030
M24/267	1.775	Paddington Gold Pty Limited	02/09/1988	01/09/2030
M24/302	985.90	Paddington Gold Pty Limited	8/12/1989	07/12/2031
M24/304	694.65	Paddington Gold Pty Limited	28/03/1990	27/03/2032
M24/390	842.90	Paddington Gold Pty Limited	31/01/1992	30/01/2034
M24/393	849.95	Paddington Gold Pty Limited	24/11/1992	23/11/2034
M24/433	8.3985	Paddington Gold Pty Limited	18/03/1994	17/03/2036
M24/705	4.7225	Paddington Gold Pty Limited	09/07/1999	08/07/2041
M24/710	7.416	Paddington Gold Pty Limited	21/06/1999	20/06/2041
M24/867	4.844	Paddington Gold Pty Limited	15/09/2004	14/09/2046

1.2 Clearing Envelope

Norton is requesting a total allowable clearing area of **480** hectares within a clearing envelope of **3,336.45** hectares as proposed in **Figure 2**.

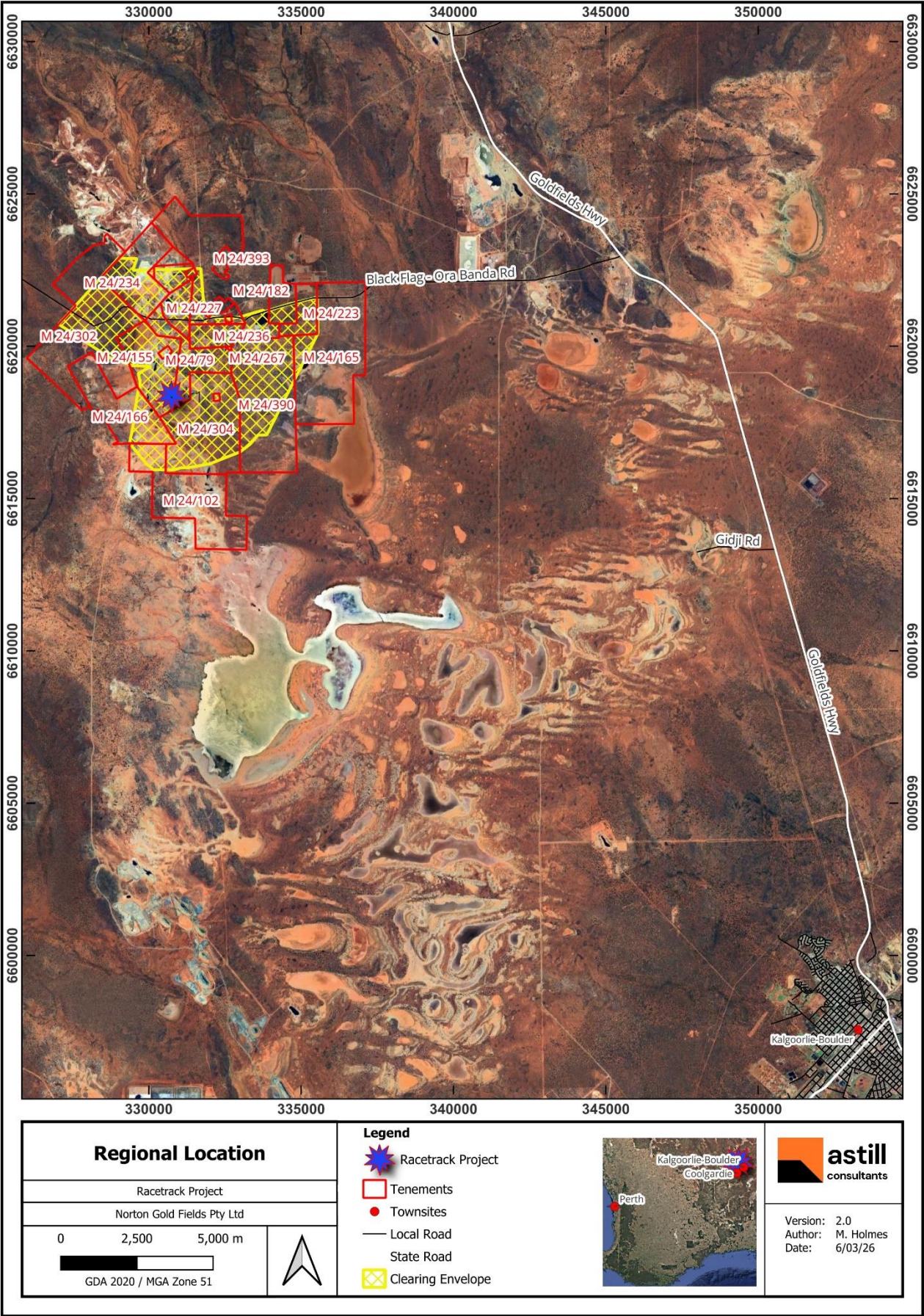


Figure 1: Regional Location

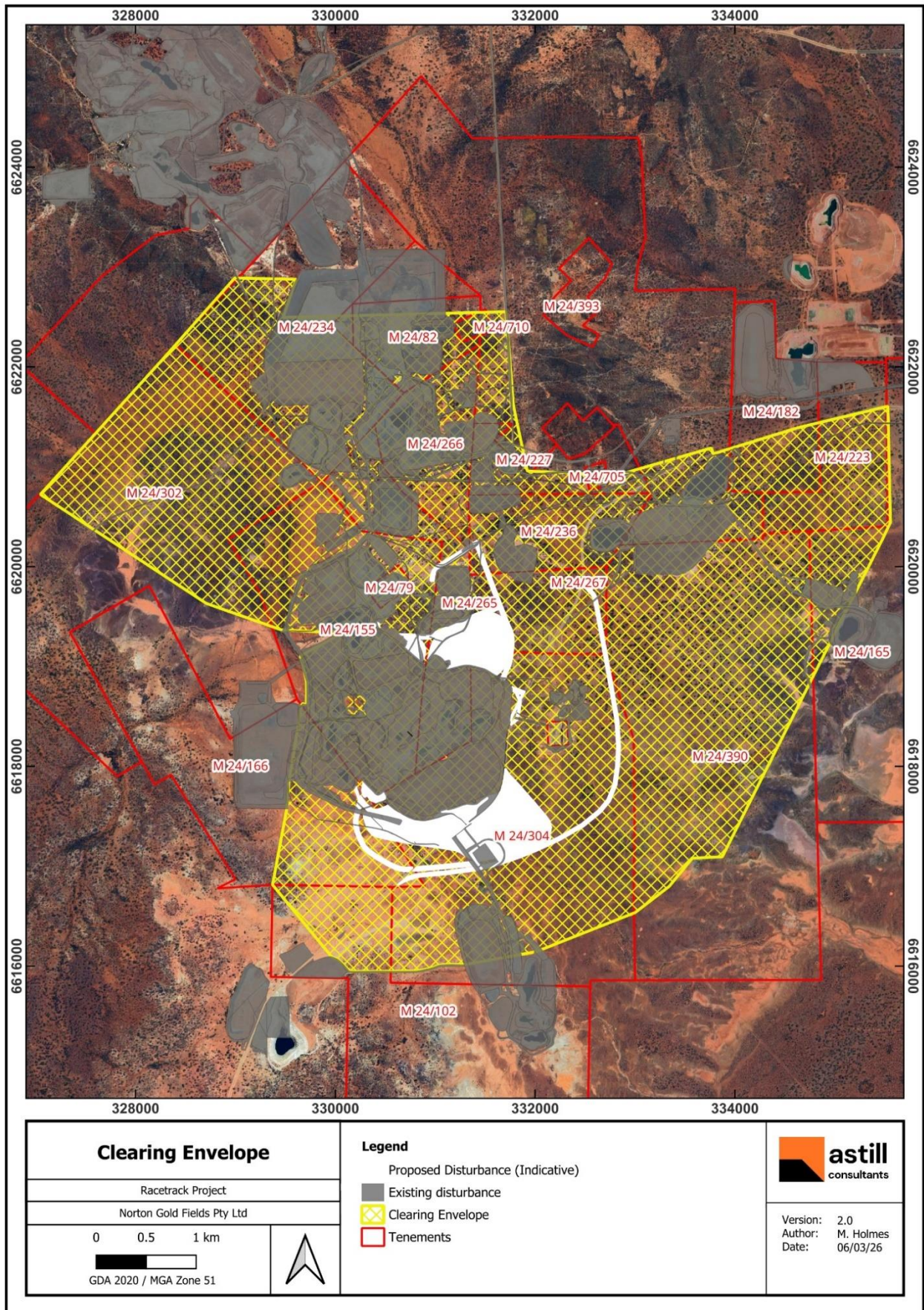


Figure 2: Clearing Envelope

1.3 Climate

Racetrack Project is located within the central climatic subregion of the Goldfields, characterised by hot summers, mild winters, and typically low average rainfall, most of which occurs during the summer months. The nearest Bureau of Meteorology (BOM) weather station to Racetrack is located approximately 5 km north-west at Kalgoorlie-Boulder Airport (Station ID 012038) (BOM, 2025a).

The Project experiences average maximum temperature of 25.4°C, and average minimum temperature of 11.8°C. Mean annual rainfall is 269.6 mm, with a mean 39 days of rain per year (≥ 1 mm). Rainfall is highest in February at 31.8 mm and lowest in September at 13.4 mm (BOM, 2025a). Mean monthly pan evaporation ranges from a maximum of 431 mm in January to a minimum of 93 mm in June (BOM, 2025a). A summary of mean climate statistics is available in

Table 2.

Table 2: Long term average temperature, rainfall and evaporation data

Month	Mean Maximum Temperature (°C)	Mean Minimum Temperature (°C)	Mean Monthly Rainfall (mm)	Mean Monthly Pan Evaporation (mm)
January	33.7	18.4	26.2	387.5
February	32.2	18.0	31.8	302.4
March	29.5	16.2	25.7	266.6
April	25.3	12.8	20.4	174
May	20.8	8.7	24.1	111.6
June	17.6	6.3	27.7	78
July	16.9	5.1	24.0	86.8
August	18.8	5.8	21.3	117.8
September	22.4	8.2	13.4	174
October	26.0	11.3	15.5	260.4
November	29.1	14.2	19.6	309
December	32.1	16.7	15.8	372
Annual	25.4	11.8	265.7	2640.1

Data taken from BOM (2025) Kalgoorlie Boulder Airport Site 012038

Annual Exceedance Probability (AEP) is defined as the chance that specific rainfall events will occur or be exceeded in any given year. BOM Intensity-Frequency-Duration data for the Kalgoorlie region identifies a 1 in 100-year (1% AEP) event as approximately 156 mm of rain in a 24-hour period (BOM, 2025b).

Morning wind conditions are predominantly easterlies while afternoon wind direction is more variable with some westerlies. Average wind speed is 15 km/h with maximum wind gusts generally seen in September-October (BOM, 2025a).

1.4 Landscape

1.4.1 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 lies within the Eastern Goldfields (COO03) subregion of the Coolgardie Bioregion, as defined by the Interim Biogeographic Regionalisation of Australia (IBRA, 2020).

The Eastern Goldfields subregion (5,102,428 ha) lies on the Yilgarn Craton's Eastern Goldfields Terrain, which is described as gently undulating plains with a subdued relief, interrupted in the west with low hills and ridges of Archaean greenstones and in the east by a horst of Proterozoic basic granulite. The 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).

The vegetation consists of Mallees, Acacia thickets and shrub-heaths on sandplains, with diverse Eucalyptus woodlands occurring around salt lakes, on ranges, and in valleys. Salt lakes support dwarf shrublands of samphire. Woodlands and Dodonaea shrubland occur on basic granulite of the Fraser Range, and the area is rich in endemic Acacias.

1.4.2 Soils

The survey area lies within the Kalgoorlie Province, located in the southern Goldfields between Paynes Find, Menzies, Southern Cross and Balladonia. The landscape consists of undulating plains (with some sandplains, hills and salt lakes) on the granitic rocks and greenstone of the Yilgarn Craton. Soils range from calcareous loamy earths and red loamy earths with some salt lake soils to red deep sands, yellow sandy earths, shallow loams and loamy duplexes. Vegetation communities are predominately Eucalypt woodlands with some acacia-casuarina thickets, mulga shrublands, halophytic shrublands and spinifex grasslands.

The Kalgoorlie Province is further divided into six soil-landscape zones, with the survey area located in one zone, the Kambalda Zone. The Kambalda zone (265) is located in the south-eastern Goldfields between Menzies, Norseman and the Fraser Range and contains flat to

undulating plains (with hills, ranges and some salt lakes and stony plains) on greenstone and granitic rocks of the Yilgarn Craton. Soils consist of calcareous loamy earths and red loamy earths with salt lakes soils and some red-brown hardpan shallow loams and red sandy duplexes. Vegetation includes red mallee, blackbutt-salmon gum-gimlet woodlands with mulga and halophytic shrublands (and some spinifex grasslands) (Tille, 2006).

The soil landscape zones are further divided into soil landscape systems, with the survey area located within three landscape systems, as described in **Table 3** and shown in **Figure 3**.

Table 3: Soil Landscape systems

Zone	Landscape System / Mapping Unit	Description
Kambalda	BB5 (265 BB5)	Rocky ranges and hills of greenstones-basic igneous rocks.
	Mx40 (265 Mx40)	Flat to undulating valley plains and pediments; some rock outcrop.
	SV15	Salt lakes and their associated area

Landloch (2019) undertook soil characterisation of 20 soil samples Norton personnel collected from 10 locations across the Mount Pleasant area, including the Racetrack project and its surrounds (**Appendix B**). A single topsoil and subsoil sample was taken for each of the soil samples. Holes were dug with a shovel to 300mm depth or to refusal, with topsoil samples taken from the top 100mm, and subsoil samples from the lower 200–300mm. GPS co-ordinates and photos were recorded at each location. Samples were approximately 1kg in size and were sent to Landloch's facility in Bibra Lake for laboratory analysis.

Of the 10 sample locations, one was located within the Racetrack project area or Mx40 (at time of report, referred to as Tuart) and four were located slightly outside of the project area (Rose Dam South), however were located within one of the three land systems covering the project (BB5) and are hence representative of soils within this land system. The report found the Rose Dam South area may represent an area of localised higher relief and Tuart was dominated by valley plains and pediments and only minor differences in soils was expected. Land System SV15 is located on the perimeter of the clearing envelope and has not been described as it is not proposed for disturbance.

Land quality indicators included in Natural Resource Information (WA) (NR Info) provide a summary of land systems and are provided in **Table 4** for land within the Mx40 and BB5 land

systems. They indicate that the soils are likely to be neutral to alkaline in pH. Water storage capacity tends to be low or moderate.

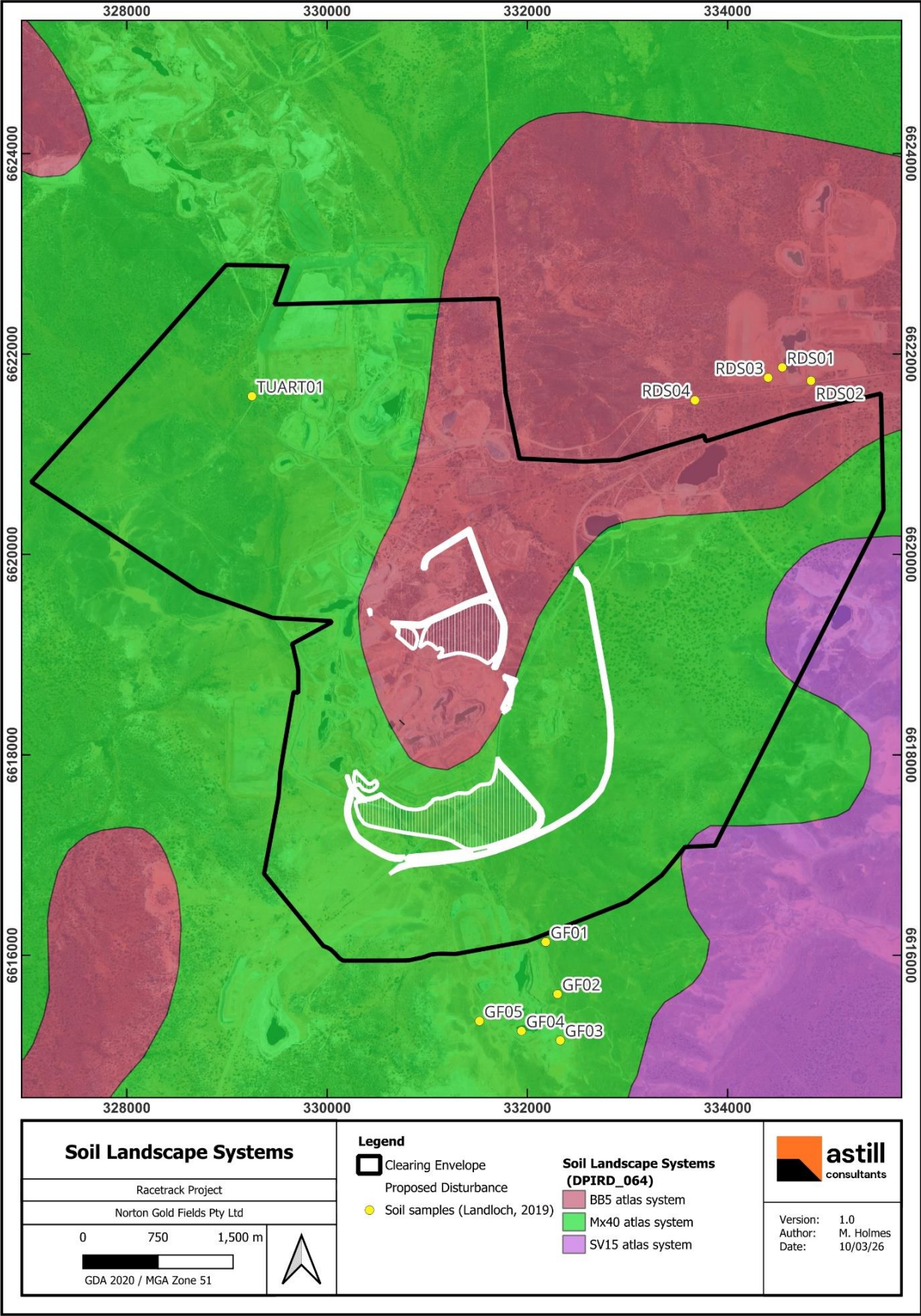


Figure 3: Soil Landscape Systems

Table 4: Soil quality indicators

Soil quality	Mx40	BB5
Acidity at surface – % of the land system that has pH (water) <5.0*	0	0
Acidity at 50–80cm – % of the land system that has pH (water) <5.0*	0	0
Alkalinity at surface – % of the land system that has pH (water) >7.5*	5	90
Salinity at surface – % of the land system that has moderate to extreme surface salinity	0	0
Water repellence susceptibility – % of the land system with high susceptibility	0	0
Soil water storage – % of the land system with extremely low or low capacity	25	0

ASRIS data was used to consider changes in soils with depth within the different land systems. Soils were broadly classified as Kandosols within the Tuart project areas and Calcarosols within the Rose Dam South project area. Kandosols are soils lacking strong texture contrast, have a sandy loam (or heavier) texture, have massive or weakly structure B horizons, and are not calcareous.

Calcarosols are usually calcareous throughout the profile and have sand or loam textures. In many cases the only functional difference between Kandosols and Calcarosols is the degree to which they are calcareous. An extract of the ASRIS digital soils data (derived from remote sensing and very sparse data) for Rose Dam South and Tuart project areas showed:

- Soils at Rose Dam South tend to have alkaline pH, increasing with depth.
- Soils at Tuart tend to have acid to alkaline pH, increasing with depth.
- Soils tend to be non-saline, though Rose Dam South may be slightly more saline than Tuart.
- Loam is textured, becoming heavier with depth.
- Non-sodic at the surface, becoming more sodic with depth.
- Permeable surface soils, becoming less permeable with depth.

1.5 Biodiversity

1.5.1 Biological Surveys

Botanica Consulting conducted a detailed flora and vegetation survey and basic fauna assessment of the southern section of the Project area (approximately 540 ha in extent) in 2025 (Botanica, 2025), attached as **Appendix C**. Field surveys were conducted on 13th to 14th September 2025 by two Botanica personnel traversing the area on foot and using an all-terrain vehicle.

Botanica Consulting also conducted a reconnaissance flora and vegetation survey, basic fauna survey and targeted Mallefowl and Arid Bronze Azure Butterfly survey of the northern section of the project area (approximately 2,450 ha in extent) in 2021 (Botanica, 2021), attached as **Appendix D**. Field surveys were conducted on 30th September and 1st October 2021 involving two Botanica personnel traversing the area on foot and via use of a 4WD and all-terrain vehicle.

Both survey areas can be seen in **Figure 4**.

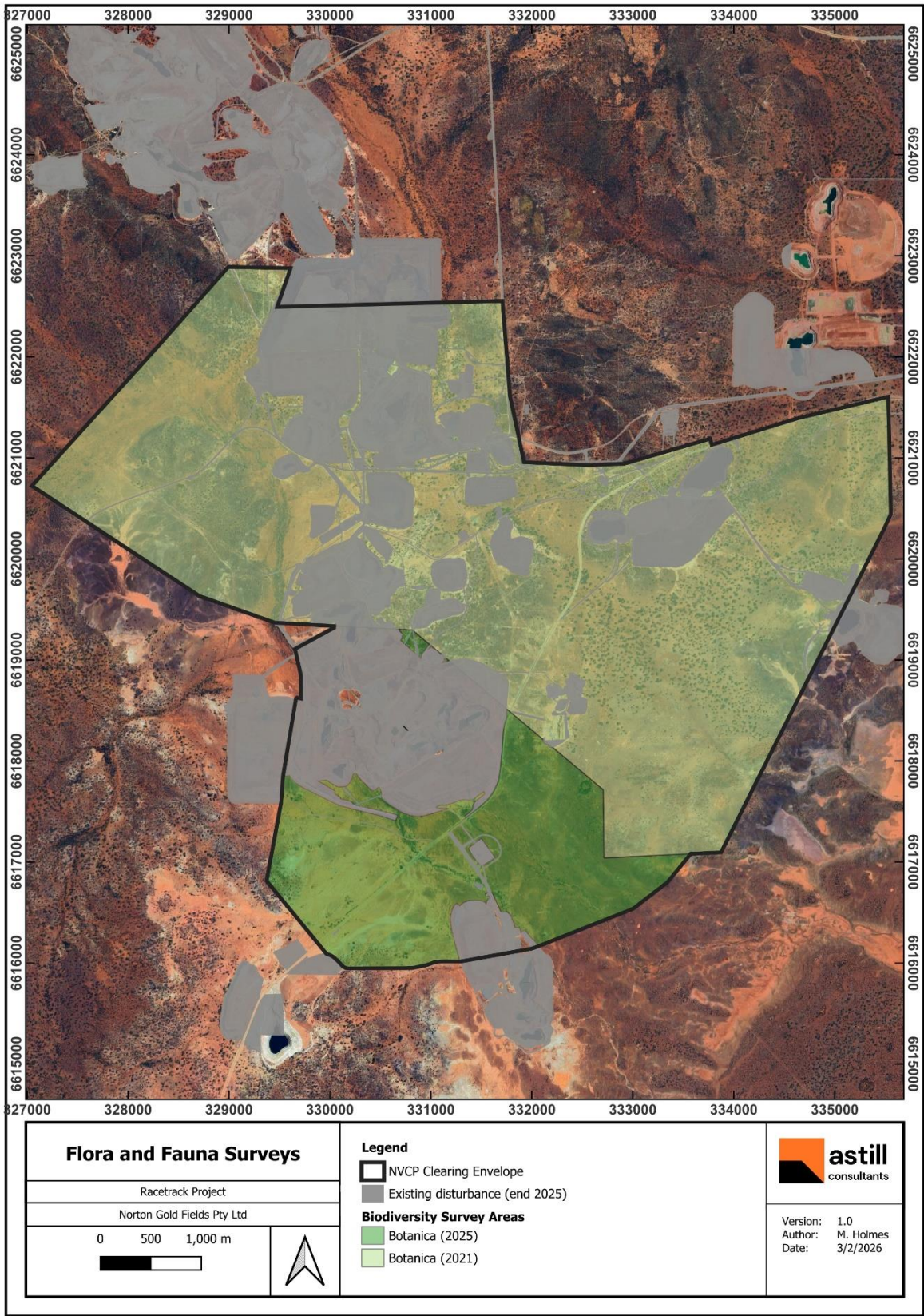


Figure 4: Flora/Vegetation and Basic Fauna Survey

1.5.1.1 Pre-European Vegetation Mapping

The pre-European vegetation association dataset (DPIRD, 2018) indicates there are three vegetation associations occurring within the project area, as listed below in **Table 5**.

Table 5: Pre-European Vegetation Associations

IBRA Subregion	Vegetation Association	Pre-European Extent Remaining (%)	Current Extent within DBCA managed lands (%)	Vegetation Description (Beard, 1990)
Eastern Goldfield (COO03)	Coolgardie 125	98.75	0	Salt lake, lagoon, clay pan.
	Coolgardie 540	95.69	0	Saltbush and/or bluebush with scattered low trees. Mulga and other wattles, Casuarina, Atriplex spp., Maireana spp. with <i>Acacia aneura</i> , <i>A. papyrocarpa</i> , <i>Casuarina pauper</i> .
	Kununulling 468	98.3	0.04	Woodland, other. Goldfields; gimlet, redwood etc. (<i>Eucalyptus salubris</i> , <i>E. oleosa</i>).

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). As shown in **Table 5**, all vegetation associations retain $\geq 90\%$ of the pre-European extent.

Therefore, development within the clearing envelope will not significantly reduce the extent of pre-European vegetation associations or increase the risk of loss.

1.5.1.2 Vegetation Groups

A total of eleven vegetation types were identified within the southern survey area in 2025. These vegetation types were located within five landform types of six NVIS major vegetation groups.

A total of six broad-scale vegetation communities were identified in the northern survey area in 2021. These vegetation types were not classified according to NVIS major vegetation groups (**Table 6** and **Figure 5**).

Table 6: Vegetation Types within the Combined Survey Area

Landform	Vegetation Code	NVIS Major Vegetation Group	Vegetation Type/Description	Image
Clay Loam Plain (CLP)	CLP-COW1	Casuarina Woodlands (MVG 8)	<i>Casuarina pauper</i> mid woodland over <i>Acacia tetragonophylla</i> mid open shrubland over <i>Maireana pyramidata</i> low open chenopod shrubland on clay loam plain.	
	CLP-CS1	Chenopod Shrublands (MVG 22)	<i>Dodonaea viscosa</i> low open shrubland over <i>Tecticornia indica subsp. bidens</i> chenopod shrubland on clay loam plain.	

Landform	Vegetation Code	NVIS Major Vegetation Group	Vegetation Type/Description	Image
	CLP-EW1	Eucalyptus Woodland	<i>Eucalyptus salmonophloia</i> , <i>E. celastroides</i> and <i>Casuarina pauper</i> woodland over <i>Eremophila scoparia</i> , <i>E. parviflora</i> and <i>E. decipiens</i> shrubland over <i>Ptilotus obovatus</i> , <i>Atriplex vesicarius</i> and <i>Olearia muelleri</i> low open shrubland.	
Closed Depression (CD)	CD-MW1	Mallee Woodlands (MVG 14)	<i>Eucalyptus griffithsii</i> open mallee forest over <i>Acacia tetragonophylla</i> mid shrubland over <i>Cratystylis subspinescens</i> low shrubland in closed depression.	

Landform	Vegetation Code	NVIS Major Vegetation Group	Vegetation Type/Description	Image
Drainage Depression (DD)	DD-AOW1	Acacia open Woodlands (MVG 13)	<i>Acacia ramulosa</i> low woodland over <i>Dodonaea viscosa</i> mid sparse shrubland over <i>Ptilotus obovatus</i> low shrubland in drainage depression.	
	DD-AS1	Acacia Shrublands (MVG 16)	<i>Acacia tetragonophylla</i> low shrubland over <i>Maireana pyramidata</i> low chenopod shrubland in drainage depression.	

Landform	Vegetation Code	NVIS Major Vegetation Group	Vegetation Type/Description	Image
	DD-EOW1	Eucalypt Open Woodlands (MVG 11)	<i>Eucalyptus clelandiorum</i> low woodland over <i>Eremophila scoparia</i> mid open shrubland over <i>Tecticornia disarticulata</i> low chenopod shrubland in drainage depression.	
	DD-CS1	Chenopod Shrublands (MVG 22)	<i>Acacia tetragonophylla</i> low sparse shrubland over <i>Maireana pyramidata</i> , <i>M. glomerifolia</i> and <i>Atriplex vesicaria</i> low chenopod shrubland in drainage depression.	

Landform	Vegetation Code	NVIS Major Vegetation Group	Vegetation Type/Description	Image
	DD-CSW1	<i>Casuarina</i> Low Sparse Woodland	<i>Casuarina pauper</i> and <i>Acacia caesaneura</i> sparse woodland over <i>Acacia jennerae</i> , <i>Atriplex bunburyana</i> and <i>Grevillea acuaria</i> shrubland over mixed forbs (introduced weed species)	
Open Depression (OD)	OD-CS1	Chenopod Shrubland	<i>Eremophila alternanthera</i> , <i>E. scoparia</i> and <i>E. oldfieldii</i> subsp. <i>angustifolia</i> tall sparse shrubland over <i>Tecticornia disarticulata</i> , <i>T. indica</i> subsp. <i>bidens</i> and <i>Atriplex vesicaria</i> shrubland over <i>Maireana pyramidata</i> , <i>M. sedifolia</i> and <i>M. pentameris</i> low shrubland	

Landform	Vegetation Code	NVIS Major Vegetation Group	Vegetation Type/Description	Image
Sandy Clay Loam Plain (SCLP)	SCLP-CSW1	Casuarina Open Woodland	<i>Casuarina pauper</i> , <i>Alectryon oleifolius</i> subsp. <i>canescens</i> and <i>Pittosporum angustifolium</i> sparse woodland over <i>Eremophila alternanthera</i> , <i>Dodonaea viscosa</i> and <i>Acacia tetragonophylla</i> shrubland over <i>Ptilotus obovatus</i> , <i>Ptilotus helipteroides</i> and <i>Solanum lasiophyllum</i> low shrubland	
Sand Dune (SD)	SD-AOW1	Acacia open Woodlands (MVG 13)	<i>Acacia ramulosa</i> low woodland over <i>Dodonaea viscosa</i> mid sparse shrubland over <i>Ptilotus obovatus</i> low shrubland on sand dune.	

Landform	Vegetation Code	NVIS Major Vegetation Group	Vegetation Type/Description	Image
Rocky Hillslope (RH)	RH-AS1	Acacia Tall Shrubland	<i>Acacia acuminata</i> , <i>Alectryon oleifolius</i> subsp. <i>canescens</i> and <i>Santalum spicatum</i> tall shrubland over <i>Eremophila alternanthera</i> , <i>Dodonaea lobulata</i> and <i>Senna artemisioides</i> subsp. <i>filifolia</i> open shrubland over <i>Atriplex vesicaria</i> , <i>Ptilotus obovatus</i> and <i>Maireana pyramidata</i> low shrubland	
	RH-EOW1	Eucalyptus Open Woodland	<i>Eucalyptus clelandiorum</i> , <i>E. griffithsii</i> and <i>E. yilgarnensis</i> open woodland over <i>Eremophila scoparia</i> , <i>Acacia erinacea</i> and <i>A. hemiteles</i> open shrubland over <i>Ptilotus obovatus</i> , <i>Leichardtia australis</i> and <i>Westringia rigida</i> low open shrubland	

Landform	Vegetation Code	NVIS Major Vegetation Group	Vegetation Type/Description	Image
Rocky Slope (RS)	RS-EOW1	Eucalypt Open Woodlands (MVG 11)	<i>Eucalyptus clelandiorum</i> low open woodland over <i>Senna artemisioides</i> subsp. <i>filifolia</i> mid open shrubland over <i>Maireana georgei</i> low chenopod shrubland on rocky hillslope.	
	RS-COW1	Casuarina Woodlands (MVG 8)	<i>Casuarina pauper</i> low open woodland over <i>Eremophila oppositifolia</i> mid open shrubland over <i>Maireana triptera</i> , <i>Scaevola spinescens</i> and <i>Ptilotus obovatus</i> low open shrubland on hillslope.	

Landform	Vegetation Code	NVIS Major Vegetation Group	Vegetation Type/Description	Image
	RS-AOW1	Acacia open Woodlands (MVG 13)	<i>Acacia ramulosa</i> low open woodland over <i>Dodonaea lobulata</i> low open shrubland over <i>Ptilotus obovatus</i> low open shrubland on hillslope.	

1.5.1.3 Vegetation Condition

Based on the EPA (2016a) definitions, the majority of vegetation combined over the two survey areas was rated as 'good' condition (47.9%). *Vegetation condition within the survey areas ranged from very good (1.2%) to completely degraded (26.6%) Table 7 and Figure 5).* Disturbance in the survey areas was caused by current and historical mining and exploration activities, including access tracks, mining pits, waste landforms and grazing by large feral herbivores including heavy grazing was observed (Botanica, 2025 and 2021).

Table 7: Vegetation Condition Survey Areas

Vegetation Condition	Hectares	% Area
Very Good	30.26	1.2%
Good	1, 211.50	47.9%
Degraded	615.91	24.3%
Completely Degraded	672.43	26.6%

1.5.1.4 Conservation Significant Vegetation

No Threatened Ecological Communities (TEC) listed under the Commonwealth EPBC Act, or the Western Australian BC Act are known to occur within the survey area or within 40 km of the survey area. No DBCA listed Priority Ecological Communities (PEC) are known to occur within the survey area (Botanica, 2025).

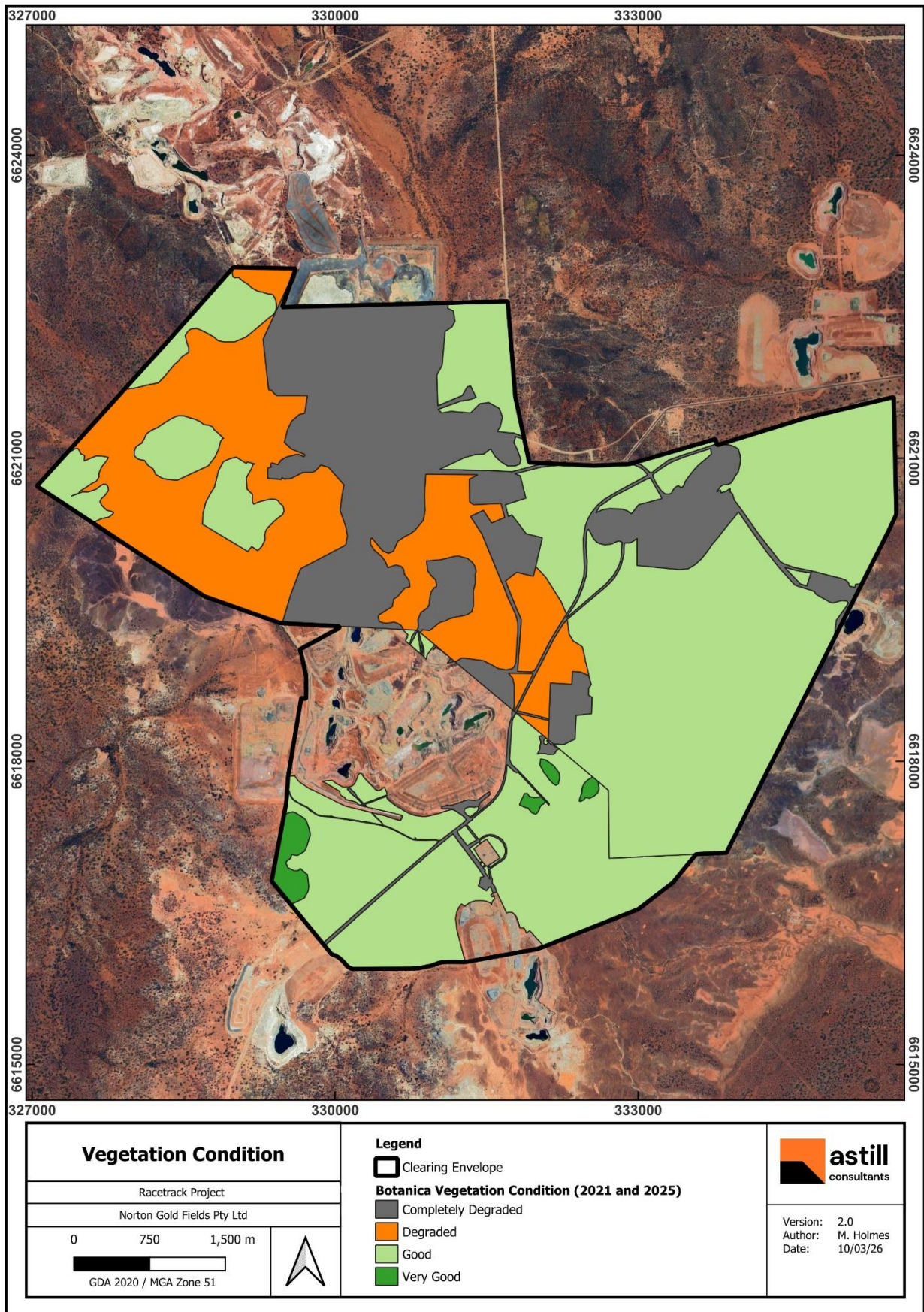


Figure 5: Vegetation Condition

1.5.1.5 Environmentally Sensitive Areas and Conservation Reserves

There are no Environmentally Sensitive Areas (ESA's) located within the clearing envelope, however, one is located approximately 36 km north. The Emu Land System is listed as a Priority 3 Priority Ecological Community (PEC). It is described as a paperbark shrubland and wetland system. It contains fresh or brackish ephemeral lakes and swamps with cane grass, lignum and paperbark shrublands (DBCA, 2023).

There are no Ramsar wetlands of international importance within the clearing envelope or within 40 km. There is one Directory of Important (DIWA) (i.e., wetlands of national importance) within 40 km of the survey area. The Rowles Lagoon Wetland system is listed as a Wetland of National Importance (ANCA Wetlands) and as an Environmentally Sensitive Area (ESA) as listed under the EP Act (Botanica, 2025). This wetland system is located approximately 35 km northwest.

There are no Reserves located in the clearing envelope, the nearest gazetted Reserve is the Kalgoorlie Arboretum (R23840) and is 26 km south. This reserve is gazetted with the Conservation and Parks Commission of WA for the purposes of 'Arboretum'. A map showing the ESA's and Conservation Reserves in proximity to the clearing envelope is shown in **(Figure 6)**.

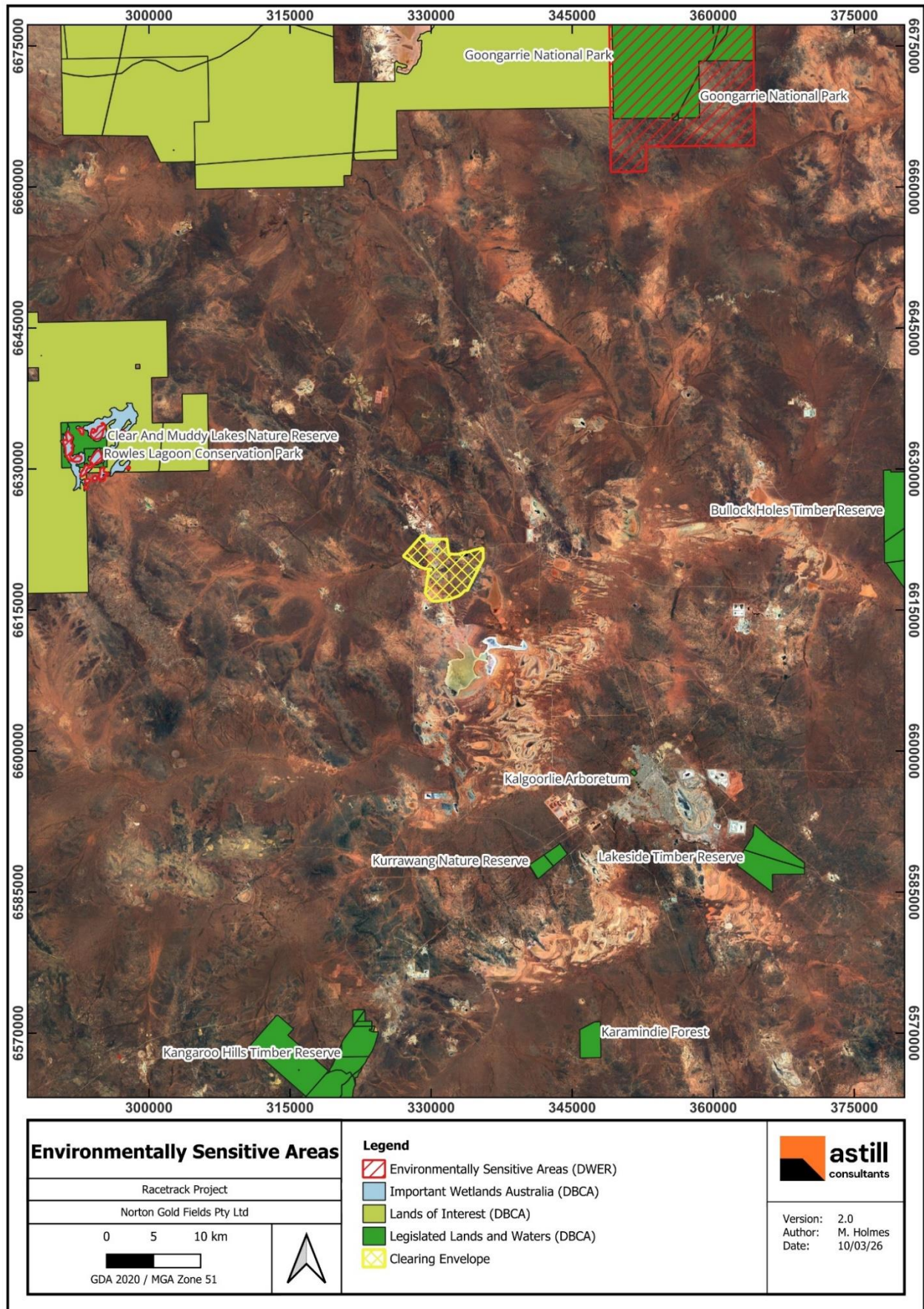


Figure 6: Environmentally Sensitive Receptors

1.5.2 Flora

The detailed flora and vegetation survey covering the southern section of the clearing envelope (Botanica Consulting, 2025) involved a desktop review, followed by a field survey and data collection. Twenty (20 x 20m) quadrats were established within the survey area according to the recommended quadrat size specified in the Environmental Protection Authority (EPA) Guidelines, for the Coolgardie Bioregion and the objective was to have at least three quadrats per vegetation type to capture floristic variations. Quadrats were not established within regrowth/modified vegetation areas. Methods of recording data from the quadrats largely followed those outlined in CSIRO's *Australian Soil and Land Survey Field Handbook* (McDonald *et al.* 2024) and in accordance with EPA Guidelines (2016).

The field survey identified 25 Families, 51 genera and 84 taxa as occurring in the survey area. Chenopodiaceae was the dominant family with 22 species in the survey area over six genera. Dominant genera included *Eremophila* (eight species), *Maireana* (eight species) and *Sclerolaena* (five species). Twenty-three annual flora species were present, eleven of these were introduced flora.

The field survey covering the northern section of the clearing envelope (Botanica Consulting, 2021) was also conducted in accordance with the EPA Guidelines (2016). It identified 117 vascular flora taxa within the survey area. These taxa represented 68 genera across 31 families, with the most diverse families being Chenopodiaceae (20 species), Fabaceae (15 species) and Asteraceae (13 species). Dominant genera include *Eremophila* (12 species), *Maireana* (nine species) and *Acacia* (eight species). Of this total, 10 taxa (8.5%) were introduced (weed) species.

1.5.2.1 Conservation Significant Species

The results of the literature review, combined search of the Flora of Conservation Significance databases (DBCA, 2025a), Dandjoo search (DBCA, 2025) and Protected Matters Search (DCCEEW, 2025) found no Threatened Flora or Priority Flora species had previously been recorded within the survey area.

Twenty-eight (28) Priority flora have previously been collected within a 40 km radius of the survey area. The Protected Matters Search (DCCEEW, 2025) listed *Thelymitra stellata* as possibly being present or having habitat present within 40 km of the survey area, however this only occurs on the Swan Coastal Plain and has not been included in the assessment (WA Herbarium, 1998).

No Threatened Flora taxa are previously known to occur or were identified within the survey areas (Botanica, 2025 and Botanica, 2021).

Two Priority 1 species were identified during the two surveys. One Priority 1 flora species (*Ptilotus rigidus*) was identified at one location, with approximately 12 plants observed, in the 2025 survey area. They are however located away from the proposed disturbance, so should not be impacted by the project (Botanica, 2025).

One Priority 1 flora species (*Ptilotus procumbens*) was recorded immediately adjacent/outside the survey area and will not be disturbed. The *Ptilotus procumbens* population, of approximately

1000 individuals observed over an area of approximately 1 ha, was recorded adjacent to (<100 m) the survey area. This species occurred in the OD-S1 vegetation community and was associated with an open drainage channel. (Botanica, 2021).

The locations of these species are shown in **Figure 7**.

Nine Sandalwood (*Santalum spicatum*) trees were recorded in the 2025 survey area and are situated within the proposed clearing envelope. Sandalwood is widespread over Western Australia and is not listed as a Threatened or Priority flora, however it has value as a forestry product.

1.5.2.2 Introduced Flora

Twelve introduced flora species were observed within the survey area in the 2025 survey. Six of these were observed in low numbers in quadrats, and in disturbed areas and along some tracks. The other six were also observed in disturbed areas and along some tracks. Of these, one (*Asparagus asparagoides*) is listed as a Declared Pest under the BAM Act and is also listed a Weed of National Significance (WoNS) by the Commonwealth DCCEEW (Botanica, 2025).

A similar number of introduced flora, ten (10), were recorded within the 2021 survey area, however there were no recorded Declared Pests or WoNS (Botanica, 2021).

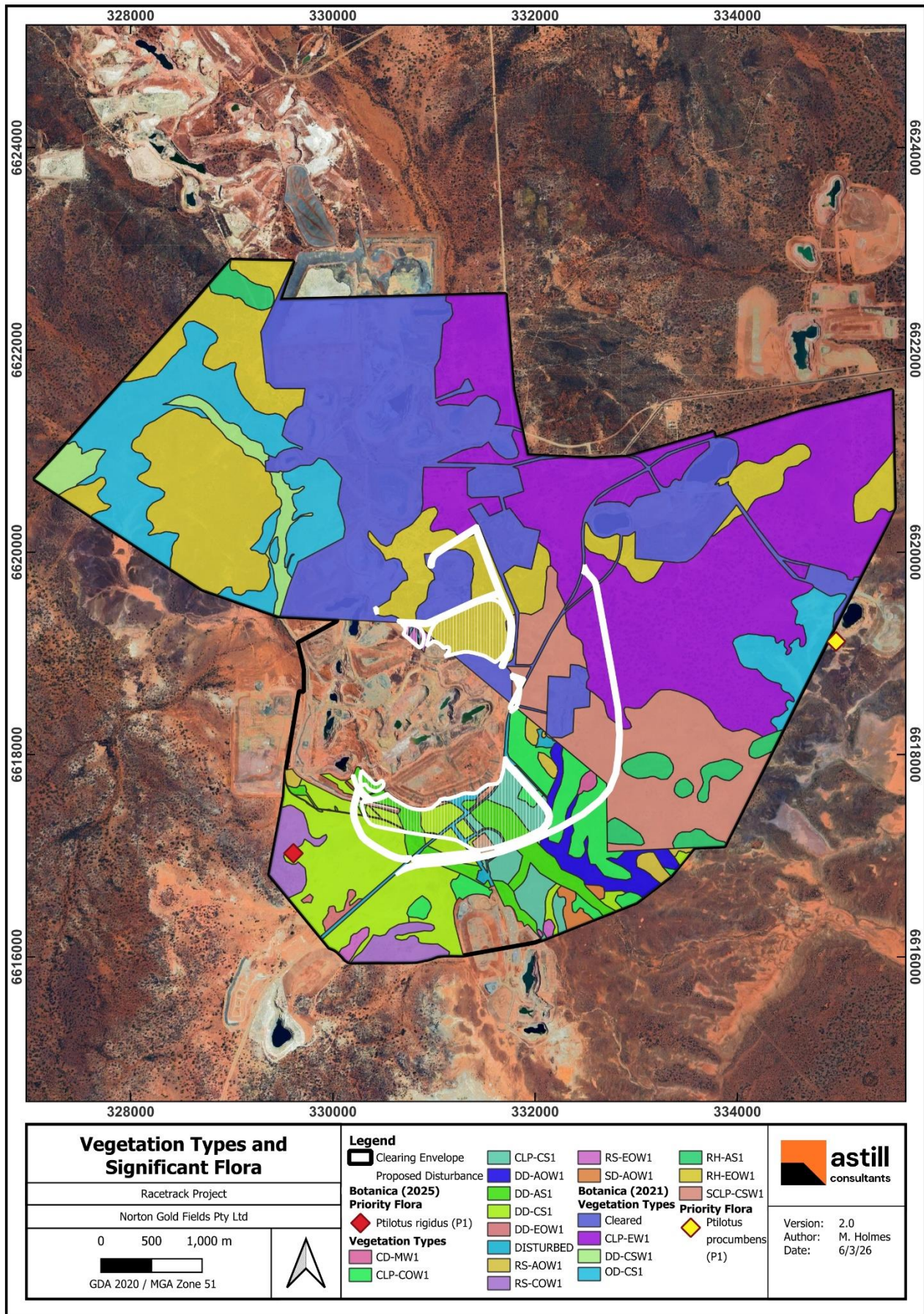


Figure 7: Vegetation Types and Significant Flora

1.6 Fauna

1.6.1.1 Habitat

Based on vegetation and associated landforms identified during the flora and vegetation assessment, six broad scale terrestrial fauna habitats were identified as occurring within the survey of the southern section and the northern section of the clearing envelope, three of which were recorded in both survey areas, resulting in 9 fauna habitats overall (2025 and 2021, Botanica). **Table 8** provides the area and a visual representation of fauna habitat types.

Table 8: Main Terrestrial Fauna Habitats

Fauna Habitat	Habitat Description	Representative Fauna Attributes	Area of Clearing Envelope	Example Image
Acacia shrubland on Rocky Hillslopes	-	-	54.1 ha or 1.6%	

Fauna Habitat	Habitat Description	Representative Fauna Attributes	Area of Clearing Envelope	Example Image
Casuarina sparse woodland in Drainage Depression	-	-	53.1 ha or 1.6%	
Clay loam plain with open Casuarina woodlands	Open <i>Casuarina</i> woodlands over chenopod shrublands on clay loam plain.	• Ground moderately suited to burrowing species. • Low diversity vegetation strata supporting a low avifauna assemblage. • Low vegetation density and low leaf litter supporting some small reptiles.	319.6 ha or 9.6%	

Fauna Habitat	Habitat Description	Representative Fauna Attributes	Area of Clearing Envelope	Example Image
Clay loam plain and/or drainage line with Chenopod shrubs	Low chenopod shrubland, over mixed forbs on a clay loam plain, or drainage depression.	- Ground moderately suited to burrowing species. - Potential refuge for small fauna under shrubs, for example reptile fauna - Low to moderate vegetation density and leaf litter. - Chenopod shrubs provide a food source to avifauna during drought conditions.	510.6 ha or 15.3%	
Clay loam plain with Eucalyptus Woodlands	-	-	720.1 ha or 21.6%	

Fauna Habitat	Habitat Description	Representative Fauna Attributes	Area of Clearing Envelope	Example Image
Closed depression with mallee woodland	Dense Mallee woodland in a closed depression.	- Ground not well suited to burrowing species. - Potential refuge for small fauna under shrubs, for example reptile fauna - Moderate to high vegetation density and leaf litter.	2.8 ha or 0.8%	
Drainage line with Eucalypt open woodlands, and/or Acacia open woodland or shrublands	Open <i>Eucalypt</i> and/or <i>Acacia</i> woodland over chenopod shrubs in drainage depression, low-lying areas.	- Ground moderately suited to burrowing species. - Potential refuge for small fauna under shrubs, for example reptile fauna - Low vegetation density and leaf litter - Chenopod shrubs provide a food source to avifauna during drought conditions.	97.9 ha or 2.9%	

Fauna Habitat	Habitat Description	Representative Fauna Attributes	Area of Clearing Envelope	Example Image
Rocky Hillslope with open Eucalypt and/or Acacia woodlands	<i>Eucalypt</i> and/or <i>Acacia</i> woodlands over <i>Eremophila</i> shrublands on a rocky hillslope.	- Ground not well suited to burrowing species. - Low diversity vegetation strata supporting a low avifauna assemblage. - Rocky areas may provide habitat for small mammals.	516.8 ha or 15.5%	
Sand dune with open Acacia woodland	<i>Open Acacia</i> woodlands over shrublands on a sand dune	- Ground well suited to burrowing species. - Moderate diversity vegetation strata supporting a moderate avifauna assemblage. - Moderate vegetation density and moderate leaf litter supporting some small reptiles.	8.1ha or 0.2%	

1.6.1.2 Significant Fauna

No evidence of significant fauna species was observed during the 2021 or 2025 survey and no fauna habitat was considered suitable to support conservation significant fauna (Botanica, 2025).

The following species of conservation significance were considered with targeted surveys:

Malleefowl (*Leipoa ocellata*)

The habitat in the southern survey area is considered unsuitable for Malleefowl breeding due to the open density of vegetation. Very unlikely that birds would utilise this area at all (Botanica, 2025).

Similarly the targeted Malleefowl survey in the northern survey area did not record any evidence of Malleefowl presence and habitat was considered marginal/or unsuitable for breeding due to poorly developed shrub layer and lack of leaf litter. Although transient individuals may pass through the survey area, it is considered unlikely to represent critical habitat for this species (Botanica, 2021).

Arid Bronze Azure Butterfly – (*Ogyris subterrestris petrina*)

The targeted ABAB survey did not record any individuals or populations of the brown-headed sugar ant within the northern survey area. A total of 63 suitable habitat trees were recorded and visually inspected during the targeted survey. Habitat was considered unsuitable due to the lack of brown-headed sugar ant populations. This species is unlikely to occur within the survey area.

The desktop review identified 21 terrestrial vertebrate fauna species of conservation significance as previously being recorded within 40 km of the survey area (DBCA, 2025b) and/or the species or species habitat that may occur within 40 km of the survey area (DCCEW, 2025). Of those, ten are Threatened species, four are Priority species and seven are listed as migratory wetland birds. Habitat and distribution data was used to determine the likelihood of occurrence within the survey area **Table 9**. It is considered that two taxon would not occur in the survey area, nine are considered unlikely to occur and four are considered to possibly occur.

Table 9: Significant Fauna Likelihood of Occurrence

Taxon	Conservation Status			Habitat Description	Likelihood
	EPBC Act	BC Act	DBCA		
Bird					
Southern Whiteface <i>Aphelocephala leucopsis</i>	VU	VU	–	Found in arid regions across most of the southern half of the Australian continent, Acacia woodlands, particularly those dominated by mulga and drought-resistant chenopod shrub species, including saltbush and bluebush (ALA, 2025).	Possibly Occurs

Sharp-tailed Sandpiper <i>Calidris acuminata</i>	VU	-	MI	Intertidal mudflats, also freshwater swamps and saltwater lakes (ALA, 20256).	Unlikely to Occur. No suitable habitat.
Curlew Sandpiper <i>Calidris ferruginea</i>	CR	CR	-	Prefers muddy edges of shallow fresh or brackish wetlands, with inundated or emergent sedges, grass, saltmarsh or other low vegetation. This includes lagoons, swamps, lakes and pools near the coast, and dams, waterholes, soaks, bore drains and bore swamps, saltpans and hypersaline salt lakes inland (DCCEEW, 2025b).	Unlikely to Occur. No suitable habitat.
Hooded Plover <i>Charadrius cucullatus</i>			P4	Freshwater lakes, freshwater marshes, coastal saline lagoons, and sandy beaches (ALA, 2025).	Unlikely to Occur. No suitable habitat.
Grey Falcon <i>Falco hypoleucos</i>	VU	VU	-	Occurs in arid and semi-arid Australia, acacia shrublands that are crossed by tree-lined water courses, has been observed hunting in treeless areas and frequents tussock grassland and open woodland, especially in winter (DCCEEW, 2025b).	Unlikely to Occur. No suitable habitat.
Malleefowl <i>Leipoa ocellata</i>	VU	VU	-	Scrublands and woodlands dominated by mallee and wattle species (DCCEEW, 2025b).	Possibly Occurs.
Blue-billed duck <i>Oxyura australis</i>	-	-	P4	The blue-billed duck is almost entirely aquatic. DBCA records are from the Rowles Lagoon wetland system.	Unlikely to Occur. No suitable habitat.
Night parrot <i>Pezoporus occidentalis</i>	CR	CR	-	Broad habitat requirements include areas of old-growth spinifex (Triodia) for roosting and nesting, together with foraging habitats that are likely to include various native grasses and herbs, that may or may not contain shrubs or low trees. (DBCA, 2017).	Would not Occur. PMST records state that the species or species habitat may be in the area. Considered to be locally extinct. Suitable habitat not present.
Princess Parrot <i>Polytelis alexandrae</i>	VU	-	P4	Dry inland areas of Spinifex with Eucalypts, desert oaks, Acacias, and sometimes amongst succulents around saltpans. Often far from water (ALA, 2025).	Unlikely to Occur. Known to occur further east in the Great Victoria Desert, although PMST records state that the species or species habitat may be in the area.

Common greenshank <i>Tringa nebularia</i>	EN	–	MI	Inland wetlands and sheltered coastal areas, including mudflats, saltmarshes, river estuaries, deltas and lagoons (ALA, 2025).	Unlikely to Occur. No suitable habitat.
Migratory Shorebirds (inc Common sandpiper, Ruddy turnstone)	MI	IA	–	Prefers muddy edges of shallow fresh or brackish wetlands, with inundated or emergent sedges, grass, saltmarsh or other low vegetation. This includes lagoons, swamps, lakes and pools near the coast, and dams, waterholes, soaks, bore drains and bore swamps, saltpans and hypersaline salt lakes inland (DCCEW, 2025b).	Unlikely to Occur. No suitable habitat. Likely to utilise the Rowles Lagoon wetland system.
Mammal					
Chuditch <i>Dasyurus geoffroii</i>	VU	VU	–	Deserts, woodlands, eucalypt shrubland, open forests and coastal areas. It is now found only in the southwest corner of Western Australia. (ALA, 2025).	Would not Occur. Considered to be regionally extinct, although PMST records state that the species or species habitat may be in the area.
Invertebrate					
Fairy shrimp <i>Branchinella denticulata</i>	–	–	P3	Historical record from Lake Gidgee. Habitat would be claypans, freshwater bodies.	Unlikely to Occur. No suitable habitat.
Inland hairstreak <i>Jalmenus aridus</i>			P2	Open woodland with mature <i>Senna artemisioides</i> ssp. <i>filifolia</i> as well as mixed flowering shrubs with open areas of well drained exposed ground adjoining the hostplants (Eastwood et al, 2023).	Possibly Occurs. Nearest record is 13 km to the east.
Arid bronze azure butterfly <i>Ogyris subterrestris petrina</i>	CR	CR		Known to occur within mature smooth barked Eucalypt woodlands in the Goldfields and Wheatbelt region of WA (DBCA, 2020).	Possibly Occurs. Nearest record is 13 km to the east.

1.6.1.3 Short Range Endemics

A Short Range Endemic (SRE) and subterranean fauna desktop assessment of the Racetrack project area was conducted by Botanica in 2026 (Botanica, 2026).

A review of the records of invertebrates found 49 invertebrates had previously been recorded within 25 km of the project area. Many of the records (n=20) were unidentifiable or could not be identified to species or morphospecies. Two of the records were potential SRE, however were data deficient and required further surveys. Three records had conservation listings in WA. These are discussed further in **Table 10** below.

Table 10: Potential SRE's known to occur within 25km of Project Area

Phylum	Class	Order	Family	Recorded Name	SRE Status	Comments
Arthropoda	Branchiopoda	Anostraca	Thamnocephalidae	<i>Branchinella denticulata</i>	Potential SRE, data deficient Listed as Priority 3 fauna in WA.	Known from nine records and two populations in WA, one is south of Exmouth, one is in the Goldfields. Listed as Priority 3 fauna in WA. This fairy shrimp and could occur in the wetlands to the south and east of the survey area but would not occur in the survey area.
Arthropoda	Insecta	Coleoptera	Buprestidae	<i>Castiarina danesi</i>	Potential SRE, data deficient	Two records in Australia, one in WA, one in SA. Jewel beetle. No date for the record is supplied, however the record puts locality as Coolgardie, therefore unlikely to be in the survey area. Jewel beetles are generally not considered in the SRE groups.
Arthropoda	Insecta	Lepidoptera	Lycaenidae	<i>Jalmenus aridus</i>	Listed as Priority 2 fauna in WA	These were surveyed for in the survey area, (Botanica, 2025b) and are unlikely to occur in the survey area.
Arthropoda	Insecta	Lepidoptera	Lycaenidae	<i>Ogyris subterrestris petrina</i>	Listed as Critically endangered under EPBC Act, and BC Act.	

SRE species are defined as having overall ranges of less than 10,000 km² with specialised habitat characteristics of short-range endemics (Harvey, 2002).

Given the project area had no habitat likely to support SREs, restricted habitats or geographic features of a smaller size that may be more likely to support unique taxa, and given the level of previous disturbance in the area, it was concluded it was unlikely any SREs would occur in the project area (Botanica, 2026).

1.6.1.4 Subterranean Fauna

Botanica SRE and Subterranean Fauna desktop assessment found limited surveys or desktop assessments on subterranean fauna in and around Kalgoorlie–Boulder (**Appendix E**).

The desktop geological assessment of the survey area found that sheetwash or alluvial units in the survey area were expected to be thin and therefore unlikely to host calcrete hosted aquifers. However, Norton have identified that calcrete is locally developed within the overburden and has been intersected in drilling as discontinuous horizons averaging approximately four metres in thickness". Botanica concluded that the survey area may contain suitable habitat for stygofauna based on available desktop information (Botanica Consulting, 2026).

The majority of non-marine stygofauna are intolerant to salinity. Most are found in freshwater (>3,000mg/L/TDS) but some will tolerate salinities above this level. Groundwater in the Paddington area is hypersaline, with Total Dissolved Solids (TDS) from recent groundwater sampling (Quarter 2 2025) ranging from 18,800 mg/L at Racetrack Pit to and 116,000 mg/L at Racetrack West Pit. It is therefore considered highly unlikely that stygofauna are present.

1.6.1.5 Introduced Fauna

Introduced mammals including cattle, cats and European rabbits were observed in the survey area during the 2025 field survey (Botanica, 2025).

1.7 Hydrology

The Racetrack Project and its immediate surrounds are located within DWER regional Salt Lake Basin, where streams and drainage lines flow to inland lakes. According to the Geoscience Australia database (Geosciences Australia, 2015), there are no permanent/ perennial inland waters in the survey area. There are however, numerous minor ephemeral drainage lines intersecting the clearing envelope (**Figure 8**).

Groundwater Dependent Ecosystems (GDE) include biological assemblages of species such as wetlands or woodlands that use groundwater either opportunistically or as their primary water source. For the purposes of this report, a GDE is defined as any vegetation community that derives part of its water budget from groundwater and must be assumed to have some degree of groundwater dependency. According to the BoM *Atlas of Groundwater Dependent Ecosystems* database (BoM, 2025b), there are no known or potential aquatic GDEs in the survey area. The survey area contains two potential terrestrial GDEs, which are rated as 'High' potential, however these are 'Bare areas/ salt lakes'.

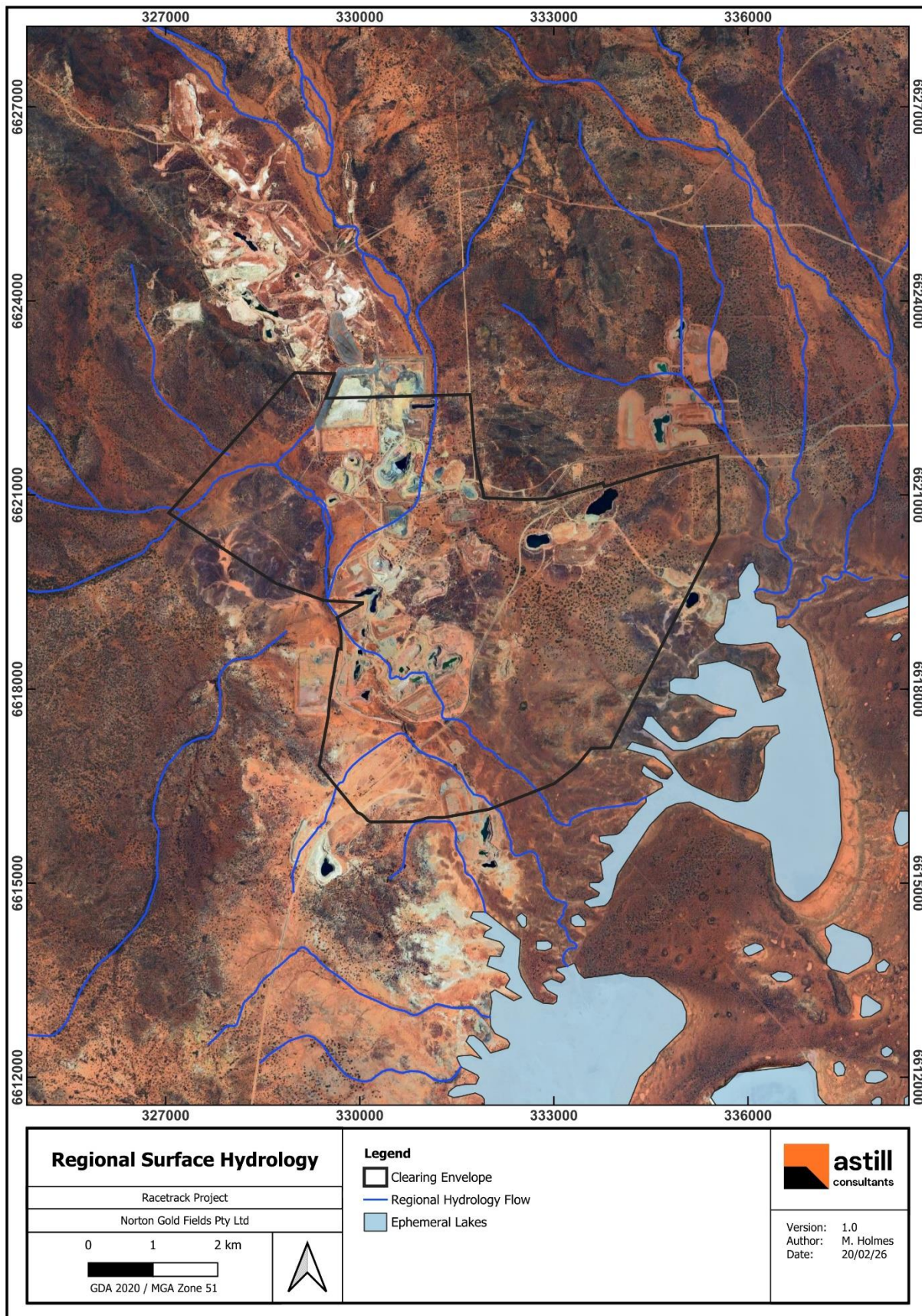


Figure 8: Regional Surface Water Hydrology

1.8 Heritage

1.8.1 Native Title

There is currently one Native Title claim over the Project area, Marlinya Ghoorlie Native Title Claimant Group (WC2017/007). Norton has consulted with Marlinya Ghoorlie Native Title Claimant Group in relation to the Project and maintains appropriate engagement with relevant knowledge holders and the Native Title Claimant group.

1.8.2 Aboriginal Heritage

A search of the Department of Planning, Lands and Heritage (DPLH) Aboriginal Cultural Heritage Inquiry System (ACHIS) in February 2026 identified (4) four registered and (2) two lodged sites within or intersecting the clearing envelope (**Figure 9**). Specific site details are specified in **Table 11** below.

Table 11: Aboriginal Heritage Sites

Site Name /ID	Status	Place Type	Assessment
Booree Yearee Gaa (ID 22885)	Lodged	Ritual / Ceremonial; Landscape / Seascape Feature	Indicative disturbance is outside the site boundary. Site will not be disturbed.
Mt Pleasant 4A (ID 21702)	Lodged	Artefacts / Scatter	Located north-western boundary of clearing envelope. Site will not be disturbed.
Black Flag Lake Graves (ID 18382)	Lodged	Burial	Indicative disturbance is outside the site boundary. Site will not be disturbed.
Mt Pleasant O3 (ID 15262)	Registered	Artefacts / Scatter; Camp; Ritual / Ceremonial; Historical; Meeting Place; Quarry	This site has as a 2 km by 2 km buffer shown on ACHIS. Site will not be disturbed.
Saxon Helmet (ID 36687)	Registered	Artefacts / Scatter	Located western boundary of clearing envelope. Site will not be disturbed.
Mt Pleasant 9A (ID 21710)	Registered	Artefacts / Scatter	Located western boundary of clearing envelope. Site will not be disturbed.
Mt Pleasant 10 (ID 21713)	Registered	Artefacts / Scatter	Indicative disturbance is outside the site boundary. Site will not be disturbed.

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

Norton 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.

1.8.3 European Heritage

All European heritage places listed in the WA State Register are protected under the *Heritage Act 2018*. A search of DPLH's inHerit database in February 2016 shows there are no heritage places located in vicinity of the Project. The closest heritage place (included in the State Heritage Register) is the Royal Flying Doctor Service base 07534 (Place no. 07534) located approximately 26 km south west of the clearing envelope.

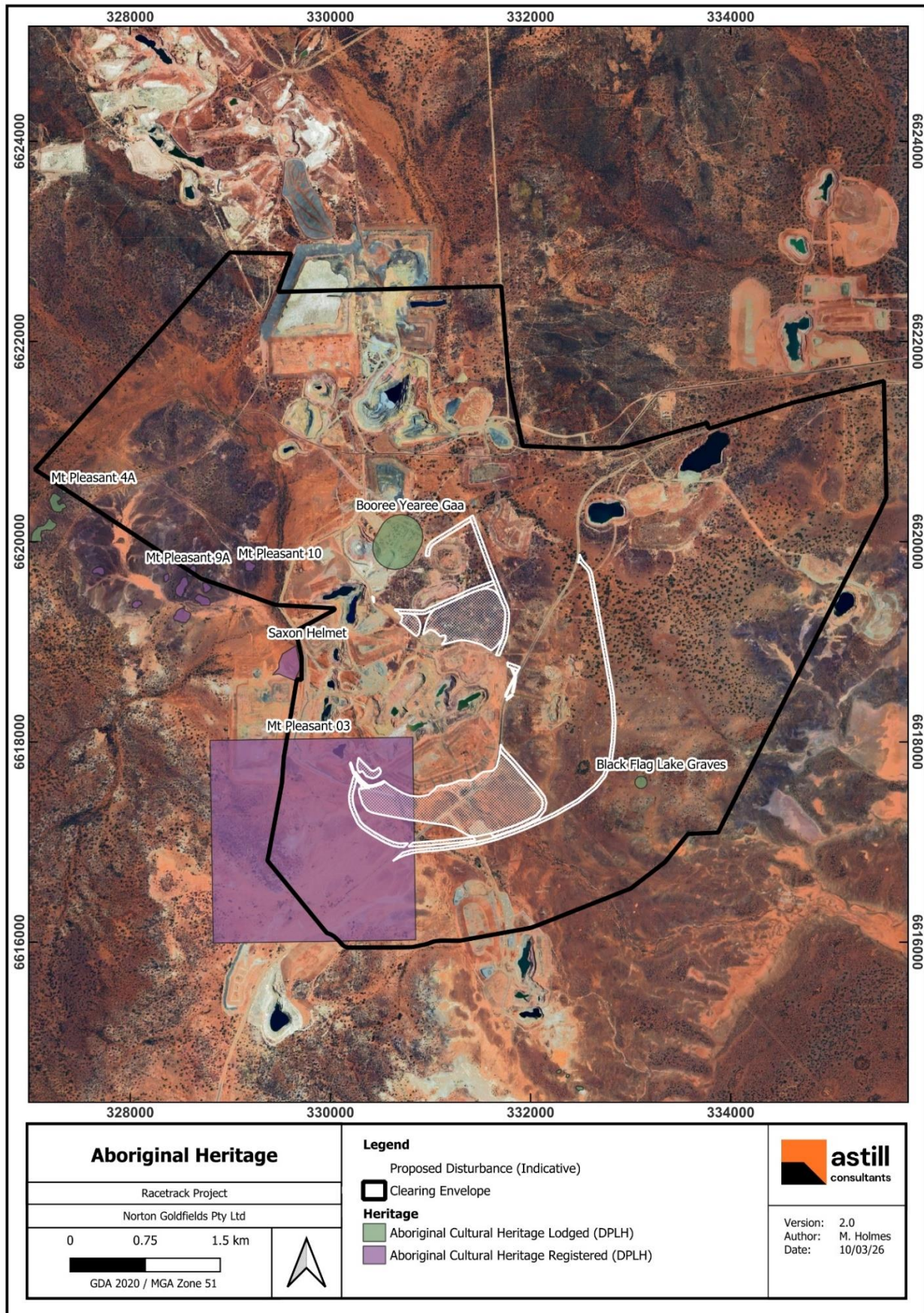


Figure 9: Aboriginal Heritage

2 Assessment Against Clearing Principles

An assessment against each of the ten clearing principles as defined under Schedule 5 of the *Environmental Protection Act 1986* demonstrates the proposed clearing is unlikely to be at variance with any of principles as outlined in **Table 12** below.

Table 12. Clearing Principles Assessment

Clearing principle	Assessment	Outcome
a) Native vegetation should not be cleared if it comprises a high level of biological diversity.	Vegetation identified within the survey area is not considered to be of high biological diversity and is well represented outside of the survey area (Botanica 2021 and 2025). There are no Threatened or Priority Ecological Communities within the survey area.	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.	The desktop and on ground assessment concluded it was unlikely any conservation significant fauna would occupy the survey area (Botanica, 2025). Botanica's targeted Malleefowl and ABAB fauna searches did not record any evidence of significant fauna within the survey area (Botanica, 2021).	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 Flora taxa are previously known to occur or were identified within the survey areas (Botanica, 2021 and 2025). Populations of Priority 1 flora species (<i>Ptilotus rigidus</i>) were recorded during the 2025 survey at one location, however these plants are located away from the proposed disturbance, so should not be impacted (Botanica, 2025). Populations of Priority 1 flora species (<i>Ptilotus procumbens</i>) were recorded during the 2021 survey, located less than 100m outside the survey area and will not be disturbed. (Botanica, 2021).	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.	No Threatened or Priority Ecological Communities (T/PECs) were identified within the survey area.	Not at variance to this principle
e) Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared	The Project area is located within three vegetation sub-associations: Coolgardie 125, Coolgardie 540 and Kununulling 468. All three vegetation sub-associations have more than 90% of their pre-European extent remaining.	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.	The Project and its immediate surrounds are located within a DWER regional Salt Lake Basin, where streams and drainage lines flow to inland lakes. There are no permanent/ perennial inland waters in the survey area. There are two minor ephemeral drainage lines that intersect the survey area.	Not at variance to this principle

g) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.	The surrounding region remains largely uncleared. Clearing within the survey area is not considered likely to lead to land degradation issues such as salinity, water logging or acidic soils.	Unlikely to be at variance to this 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.	No conservation areas, Environmentally Sensitive Areas or Nationally Important Wetlands occur within or adjacent to the clearing envelope.	Not at variance to this 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.	Multiple minor ephemeral drainage lines intersect the survey areas. Two vegetation communities associated with watercourses were recorded within the northern survey area; DD-CSW1 and OD-CS1 which represent 53.1 ha (2.1%) and 266 ha (10.9%) of this survey area respectively (Botanica, 2021). Disturbances within the survey area are not expected to cause deterioration in the quality of water on the surface or underground.	Unlikely to be at variance to this principle
j) Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.	Rainfall in the Eastern Goldfield subregion has an average rainfall of ~200 – 300mm. Clearing within the survey area is not likely to increase the incidence or intensity of flooding within the survey area or surrounds.	Unlikely to be at variance to this principle

3 Clearing Process

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

Norton maintain an internal Ground Disturbance Procedure which will be adhered to for all clearing activities conducted.

3.1 Equipment

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

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

3.2 Methodology

Clearing will be authorised under a clearing permit or valid clearing exemption (i.e., Regulation 20 of the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004*). Clearing will also

be authorised internally via an approved Ground Disturbance Permit assessed and issued by the Norton Environmental Team.

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 the clearing. A meeting will be held between the supervisor and clearing operator to ensure awareness of clearing areas and any areas to be avoided.

Where practicable, raised blade clearing will be used. Where this is not practicable, topsoil will be stripped to between 20 to 30mm 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 for records and external reporting obligations.

3.3 Rehabilitation

Rehabilitation of cleared areas will occur in accordance with the revised MDCP.

As the Racetrack project area has a history of disturbance, it is understood there will be limited availability of topsoil for recovery and existing topsoil stockpiles will be degraded due to time being held in situ. It is therefore expected a shortage of topsoil materials will be available for rehabilitation of cleared areas and strategies to address this shortfall in topsoil volumes to achieve rehabilitation outcomes are being put in place.

Any stripped vegetation will be reincorporated during rehabilitation to boost organic carbon, being track rolled by dozer and respread as the topsoil is applied.

A native seed mix will be applied across Project rehabilitation areas, and where rehabilitation monitoring determines it is necessary, additional re-seeding will be undertaken.

4 Environmental Management

Norton, in line with its environmental Policy, is committed to continual improvement and adopts an adaptive management approach to all environmental risks from its operations. Norton maintains an Environmental Management System (EMS) and implement management strategies and procedures for key environmental areas including those that relate to clearing activities (i.e. air quality, fauna, land and soils, vegetation, and weeds). Applicable management measures are summarised below.

4.1 Air quality

Dust is generated from blasting, mining, 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:

- Operate in accordance with Norton's Dust Management Plan;
- 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 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 suitable topsoil to a depth between 100 to 150 mm, or up to 300mm may be harvested to provide additional volume if required;
- To preserve soil integrity as much as practicable, soils will only be stripped and moved during dry conditions;
- Topsoil stripping to be undertaken as close as possible to commencement of activities; and
- Soils to be paddock-dumped into stockpiles or pushed into windrows of no greater than 2 m in height, in designated locations and have adequate distance between them to create a series of mounds and troughs.
- Vegetation and woody material will be collected and stockpiled separately for use in rehabilitation.

4.3 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. Norton has a Fauna Management Plan which provides guidance to employees and contractors on Norton sites and outlines commitments to minimise impacts to fauna around all project areas.

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

- Speed limits will be signed and enforced;
- When land clearing is conducted it shall be done in a slow, progressive manner, in one direction, to allow fauna opportunity to move into adjacent native vegetation ahead of the clearing activity;
- Train personnel on fauna awareness;
- Access to food wastes will be minimised by ensuring effective storage and disposal; and
- Personnel are prohibited from direct contact with fauna, including feeding.

4.4 Vegetation

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

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

- Utilising existing disturbances where possible for mine infrastructure;

- Prevent vegetation impacts of saline water spills via appropriate management of in-pit dewatering, raw water ponds and saline pipelines including placement of pipelines within v-drains, use of catch pits, visual inspections, maintaining freeboards;
- Areas to be cleared are demarcated using flagging, pegs etc. No clearing or disturbance is to occur outside marked areas;
- Clearing is undertaken in accordance with design plans, site surveys, ground disturbance permits, and clearing permits; and
- Retention of canopy trees, including Sandalwood, where possible.

4.5 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 mobile 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 as per Norton's Weed Management Plan to eradicate identified weed infestations.

5 References

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Appendix A: Proof of Ownership

Appendix B: Soil Characterisation (Landloch, 2019)

Appendix C: Flora and Vegetation and Basic Fauna Survey (Botanica, 2025)

Appendix D: Flora and Fauna Assessment of the Racetrack / Tuart Project (Botanica, 2021)

Appendix E: SRE and Subterranean Fauna Assessment (Botanica, 2026)