Application to Amend NVCP CPS 3215/3 South Parmelia Exploration

Native Vegetation Clearing Permit Amendment Application Supporting Document

May 2024





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1 INTRODUCTION

BHP Iron Ore Pty Ltd (BHP) currently operates a number of Iron Ore mines and associated rail and port infrastructure within the Pilbara region of Western Australia (WA). Current mining operations include the:

- Newman Operations consisting of:
 - The Mount Whaleback hub (including Orebodies 29, 30 and 35) located approximately two kilometres (km) west of Newman Township; and;
 - The Eastern Ridge hub (Consisting of Orebodies 23, 24, 25 25 West and 32) located approximately 5 km east of Newman Township;
- Mining Area C located approximately 90 km north west of Newman Township;
- Orebodies 18 and Wheelarra Hill (Jimblebar) Mine located approximately 35 km east of Newman Township; and
- Yandi Mine located approximately 100 km north west of Newman Township.

Ore from the above mining operations is transported to Port Hedland via the BHP Newman to Port Hedland Mainline (and associated spur lines) and is then shipped out through Port Hedland at the BHP facilities at Nelson Point and Finucane Island.

BHP currently holds Native Vegetation Clearing Permit (NVCP) CPS 3215/3 for the purposes of mineral exploration, geotechnical investigations, hydrological investigations, installation of meteorological masts and LiDAR stations and any associated activities (**Figure 1**). The clearing period for this permit expires on 30 November 2024. BHP is yet to complete the full drilling extends for this deposit and therefore is seeking to make the following amendments to CPS 3215/3:

- Increase the disturbance limit from 140 ha to 200 ha.
- Amend the Permit boundary to exclude recently identified caves (100 m buffer) and waterholes (10 m buffer);
- Extend the permit duration to 30 November 2034;
- Extend the clearing period to 30 November 2029;
- Extend the final reporting date to 30 November 2034; and
- Amend the permit holder name to "BHP Iron Ore Pty Ltd.".

No other changes to the permit are required.

In accordance with Part V Division 2 of the *Environmental Protection Act 1986* (EP Act), BHP hereby refers the application to amend NVCP CPS 3215/3 to the Department of Energy, Mines, Industry Regulation and Safety (DMIRS).

BHP considers that the proposed amendment application will not result in any significant environmental or social impacts and that the proposed Project complies with the 'Ten Clearing Principles', as defined in Schedule 5 of the *Environmental Protection Act 1986* (EP Act).

1.1 LOCATION

The Amendment Application Area is located approximately 50 km northwest of Newman in the Pilbara region of Western Australia (**Figure 1**).

1.2 TENURE

The Amendment Application Area is located on State Agreement Mineral Lease 244SA.

1.3 LOCAL GOVERNMENT JURISDICTION

The Amendment Application Area is located within the Shire of East Pilbara.

1.4 PROPONENT

The Project is managed and operated by BHP Iron Ore on behalf of the owners, the Mount Goldsworthy Joint Venture (MGJV). The split between the partners of the MGJV is as follows:

BHP Minerals Pty Ltd

85%

Itochu Minerals and Energy Australia Pty Ltd

5%

Mitsui Iron Ore Corporation Ptv Ltd

10%



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maintain the natural surface flow.

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1.5 PROJECT DESCRIPTION

The proposed works will involve clearing for the purposes of mineral exploration, geotechnical investigations, hydrological investigations, installation of meteorological masts and LiDAR stations and any associated activities.

1.6 PROJECT CHARACTERISTICS AND COMMITMENTS.

BHP commits to undertake the Project in accordance with the details set out in Table 1.

Table 1 Project Characteristics and Commitments

| Table 1 Project Ch | aracteristics and Commitments | | |
|---|---|--------------------------------|--|
| Permit Characteristics | | | |
| Authorising Agency | DEMIRS | | |
| Permit Title | South Parmelia Exploration Project | | |
| Area to be cleared | 200 hectares | | |
| Amendment Application Area | 4,616.73 ha | | |
| Purpose of the permit | Clearing for the purposes of mineral exploration, investigations, hydrological investigations, installation of m masts and LiDAR stations and any associated activities. | | |
| Tenure | Mineral Lease 244SA. | | |
| Clearing Duration | Until 30 November 2029 | | |
| Permit Duration | Until 30 November 2034 | | |
| Proposed Annual Reporting Date | 01 October for the previous Financial Year | | |
| Proposed Final Reporting Date | 30 November 2034 | | |
| Application boundary | Map Reference: • EXP_027NVCP_001_RevA_0 • EXP_027NVCP_002_RevA_0 • EXP_027NVCP_003_RevA_0 • EXP_027NVCP_004_RevA_0 • EXP_027NVCP_005_RevA_0 BHP Shapefile D2 Reference: https://waio- dctm.bhp.com/D2/?docbase=bhpbio_od_prod&locateId=0b 6fa1&application=ManagedDocuments | 03c41a8475 | |
| Application Commitments | | Section | |
| Populations of Priority flora will be ave | oided by a 10 m buffer where practicable. | 3.4.2 | |
| Control and Management Procedures | ions will be carried out according to BHP's standard Weed s. are identified they will be avoided using a 10 m buffer, where | 6.1 3.4.3 6.7.4 3.4.4 | |
| Active Pebble-mouse mounds will be avoided using a 10 m buffer, where practicable. 3.4.4 6.2 | | | |
| Existing cleared tracks will be used to | o cross Weeli Wolli Creek | 3.6 6.6 6.9 | |
| drainage line. If it is necessary for n | racks will be used to cross the unnamed non-perennial minor ew crossings to be installed, clearing will be kept to a bare level to the surface (i.e. a simple clearing with no bunds) to | 3.6 6.6 6.9 | |



1.7 NVCP RECORDS

BHP reports on each NVCP in accordance with the permit reporting conditions. For a majority of BHP reports on each NVCP in accordance with the permit reporting conditions. For a majority of NVCPs this is incorporated into BHP Iron Ore's Annual Environmental Report (AER) which is submitted to government prior to the 01 October each year.

Clearing commenced in 2009 with a total of 24.88 ha reported in the FY23 AER (BHP, 2023) and a further 5.03 ha cleared in FY24 to date. These cleared areas still required for the purpose for which they were cleared so have not been rehabilitated.

Clearing has been minimised by restricting activities to the minimal required for safety and equipment access. Populations of significant flora have been avoided using the BHP Project Environmental and Heritage Review (PEAHR) procedure. This internal BHP procedure authorises ground disturbing activities. No environmental offsets are required for this NVCP.

2 ASSOCIATED APPROVALS

Any other additional approvals will be sought as required.



3 EXISTING ENVIRONMENT

3.1 CLIMATE

Newman Aero meteorological site (007176) is the closest Bureau of Meteorology (BoM) station to the to the Amendment Application Area. Average annual rainfall at Newman Aero is 318.0 mm (BOM, 2024a). This is mainly derived from tropical storms and cyclones during summer, producing sporadic, heavy rains over the area. Mean monthly rainfall varies from 4.6 mm in September to 71.6 mm in February (BoM, 2024a). Daily rainfall is highly variable; the highest maximum daily rainfall ranges from 34.8 mm in October, to 305.6 mm in February (BoM, 2024a). The mean maximum temperature in summer months (October to March) is 35.2°C to 39.4°C, and mean maximum temperature in winter (April to September) is between 23.0°C and 32.1°C (BoM, 2024a).

Wittenoom meteorological site (005026) is the closest station to the Amendment Application Area that records daily evaporation. Wittenoom is located approximately 120 km northwest of the Amendment Application Area. Mean daily evaporation at Wittenoom throughout the year is 8.6 mm/day (BoM, 2023b), which equates to 3.1 metres per year. Evaporation greatly exceeds rainfall in the region throughout the year and on a month-by-month basis (BoM, 2024b).

3.2 BIOREGION, LANDFORMS AND LAND SYSTEMS

The Amendment Application Area is situated in the following biogeographic sub-region:

• Hamersley subregion (PIL3) of the Pilbara region described as: "Mountainous area of Proterozoic sedimentary ranges and plateaux, dissected by gorges (basalt, shale and dolerite). Mulga low woodland over bunch grasses on fine textured soils in valley floors, and Eucalyptus leucophloia over Triodia brizoides on skeletal soils of the ranges. The climate is semi-desert tropical, average 300 mm rainfall, usually in summer cyclonic or thunderstorm events. Winter rain is not uncommon. Drainage into either the Fortescue (to the north), the Ashburton to the south, or the Robe to the west. Subregional area is 6,215,092ha" (Kendrick, 2001).

The proposed Amendment Application Area is also located in the following land systems, as mapped by van Vreeswyk et al. (2004):

Egerton: Highly dissected hardpan plains, slopes and narrow drainage floors, relief up to 20 m.

McKay: Hills, ridges, plateaux remnants and minor breakaways of sedimentary and meta

sedimentary rocks, relief up to 100 m.

Newman: Rugged high mountains, ridges and plateaux with near vertical escarpments of

jaspilite, chert and shale, the second largest system in the survey area and prominent

in southern parts (e.g. Ophthalmia Range, Hamersley Range), relief up to 450 m.

Platform: Narrow, raised plains and highly dissected slopes on partly consolidated colluvium

below the footslopes of hill systems such as Newman, relief mostly up to about 30 m

but occasionally considerably greater.

These Land Systems are well represented in their bioregions.

3.3 GEOLOGY AND SOILS

The Australian Soil Resource Information System (ASRIS) provides soil and land resource information across Australia. The following two soil types occur within the Amendment Application Area (CSIRO, 2021):

Fa13: Ranges of banded jaspilite and chert along with shales, dolomites, and iron ore formations; some areas of ferruginous duricrust as well as occasional narrow winding valley plains and steeply dissected pediments. This unit is largely associated with the Hamersley and Ophthalmia Ranges. The soils are frequently stony and shallow and there are extensive areas without soil cover: chief soils are shallow stony earthy loams (Um5.51) along with some (Uc5.11) soils on the steeper slopes. Associated are (Dr2.33 and Dr2.32) soils on the limited areas of dissected pediments, while (Um5.52) and (Uf6.71) soils occur on the valley plains.

Fa14: Steep hills and steeply dissected pediments on areas of banded jaspilite and chert along with shales, dolomite, and iron ore formations; some narrow winding valley plains: chief soils are shallow stony earthy loams (Um5.51) along with some (Uc5.11) soils on the steeper slopes. (Dr2.33, Dr2.32) soils which occur on the pediments are more extensive in this unit than in unit Fa13. (Um5.52) and (Uf6.71) soils occur on the valley plains.



3.4 FLORA, VEGETATION AND FAUNA

There have been ten flora and vegetation surveys across the Amendment Application Area. The most relevant surveys are:

- Jinidi Detailed Flora and Vegetation Survey Interim Report: Dry-season (Biologic, 2024a) (Appendix 1);
- Consolidation of Regional Vegetation Mapping BHP Billiton Iron Ore Pilbara Tenure (Onshore Environmental, 2014) (Appendix 2); and
- Flora and vegetation Review Jinidi Iron ore Project (Onshore Environmental, 2012).

There have been nine vertebrate fauna surveys across the Amendment Application Area. The most relevant surveys are:

- Jinidi Targeted Vertebrate Fauna Survey (Biologic, 2024b) (Appendix 3); and
- South Parmelia Level 2 Vertebrate Fauna survey (Biota, 2013).

3.4.1 Vegetation Communities

The Amendment Application Area is located within the Interim Biogeographic Regionalisation for Australia (IBRA) Pilbara Bioregion (Department of Environment and Heritage, 2005). According to the Government of Western Australia (2013), this bioregion is more than 99.9% vegetated (**Table 2**). The vegetation within the Amendment Application Area is classified as the following vegetation associations, as mapped by Beard (1975):

- 18 Low woodland; mulga (Acacia aneura)
- Hummock grasslands, low tree steppe; snappy gum over *Triodia wiseana*.

There is more than 99% of the pre-European vegetation remaining of these vegetation associations (**Table 2**). The Amendment Application Area is not part of any significant remnant vegetation in the wider regional area.

Table 2 Pre European extent of vegetation associations occurring within the Amendment Application Area (Shepherd *et al.*, 2001)

| Vegetation Association | Pre-European Extent (ha) | Current Extent (ha) | % Remaining | Pre-European % in IUCN Class I-IV Reserves |
|--|-----------------------------|------------------------|----------------|--|
| Pilbara IBRA Bioregion | 17,808,657 | 17,733,584 | 99.58 | 6.34 |
| Vegetation type 18 in Western Australia | 19,890,664 | 19,843,409 | 99.76 | 2.13 |
| Vegetation type 18 in the Pilbara IBRA Bioregion | 676,556 | 672,424 | 99.39 | 16.78 |
| Vegetation association 82 within Western Australia | 2,565,901 | 2,553,217 | 99.51 | 10.25 |
| Vegetation association 82 within the Pilbara IBRA | 2,563,583 | 2,550,899 | 99.51 | 10.26 |

A total of five broad floristic formations with 13 vegetation associations have been described and mapped within the Amendment Application Area (Figure 2 and Table 3).

The Onshore Environmental (2014) Consolidation of Regional Vegetation Mapping BHP Billiton Iron Ore Pilbara Tenure (Appendix 1) undertook a detailed review of all previous flora and vegetation surveys across BHP's Pilbara operations (162 baseline flora and vegetation surveys between 2004 and 2013). This review was supported by field visits where the analysis indicated that further information was required to confirm the exact vegetation associations.

Historical survey reports often used different techniques and/or nomenclature, however they generally utilised similar field methods. The Project resolved the inconsistencies between previous vegetation mapping and created one consolidated regional Geographic Information System (GIS) database which:

- Serves as BHP's base line vegetation dataset;
- Maps and describes a total of 53 broad floristic communities with 218 distinct vegetation associations across BHP's Pilbara operations; and
- Provides consistency in methods and nomenclature across BHP's Pilbara operations.



Table 3 Vegetation associations of the Amendment Application Area (Onshore 2014)

| Broad Floristic Formation | | ssociation Description |
|---|--|--|
| Acacia Low Open Forest | HS AcaoAaApr ScaErllAb TbrTw | Low Open Forest of Acacia catenulata subsp. occidentalis, Acacia aptaneura and Acacia pruinocarpa over Open Shrubland of Scaevola acacioides, Eremophila latrobei subsp. latrobei and Acacia bivenosa over Open Hummock Grassland of Triodia brizoides and Triodia wiseana on red brown clay loam on breakaway scree slopes and steep hill slopes. |
| | SP AaApr ErcuColpSo p TpTw | Low Open Forest of Acacia aptaneura and Acacia pruinocarpa over with Low Open Shrubland of Eremophila cuneifolia, Corchorus lasiocarpus subsp. parvus and Solanum phlomoides over Hummock Grassland of Triodia pungens and Triodia wiseana on red brown clay loam on stony plains. |
| Eucalyptus Low Open Forest | MA EcrEvEx ApypAtpGor o TtEuaCyp | Low Open Forest of Eucalyptus camaldulensis subsp. refulgens, Eucalyptus victrix and Eucalyptus xerothemica over High Shrubland of Acacia pyrifolia var. pyrifolia, Acacia tumida var. pilbarensis and Gossypium robinsonii over Open Tussock Grassland of Themeda triandra, Eulalia aurea and Cymbopogon procerus on red brown clay loam on major drainage lines. |
| Petalostylis Shrubland | MI PIAtpAm ChEll TwTp | Shrubland of Petalostylis labicheoides, Acacia tumida var. pilbarensis and Acacia monticola with Low Open Woodland of Corymbia hamerselyana and Eucalyptus leucophloia subsp. leucophloia over Open Hummock Grassland of Triodia wiseana and Triodia pungens on red brown loam on minor drainage lines. |
| Triodia Hummock Grassland | CP TwTa Ese AbPIApyp | Hummock Grassland of Triodia wiseana and Triodia angusta with Open Mallee of Eucalyptus socialis subsp. eucentrica and Open Shrubland of Acacia bivenosa, Petalostylis labicheoides and Acacia pyrifolia var. pyrifolia on light brown clay loam on calcrete plains and rises. |
| | FS Ts CdHc AancAiGrwh | Hummock Grassland of Triodia sp. Shovelanna Hill (S. van Leeuwen 3835) with Low Open Woodland of Corymbia deserticola subsp. deserticola and Hakea chordophylla over Open Shrubland of Acacia ancistrocarpa, Acacia inaequilatera and Grevillea wickhamii subsp. hispidula on red brown sandy loam on footslopes and stony plains. |
| | FS TsTpTw Ell AbApaAanc | Hummock Grassland of Triodia sp. Shovelanna Hill (S. van Leeuwen 3835), Triodia pungens and Triodia wiseana with Low Open Woodland of Eucalyptus leucophloia subsp. leucophloia and Open Shrubland of Acacia bivenosa, Acacia pachyachra and Acacia ancistrocarpa on red brown loam on footslopes, low undulating hills and stony plains. |
| | HC TpTwTs EllCh AarGooKeve | Hummock Grassland of Triodia pungens, Triodia wiseana and Triodia sp. Shovelanna Hill (S. van Leeeuwin 3835) with Low Open Woodland of Eucalyptus leucophloia subsp. leucophloia and Corymbia hamersleyana over Low Shrubland of Acacia arida, Gompholobium oreophilum and Keraudrinia velutina subsp. elliptica on red brown loam on hill crests and upper hill slopes. |
| | HC Tw Ah EkkEgCh | Hummock Grassland of Triodia wiseana with Shrubland of Acacia hamersleyensis and Open Mallee of Eucalyptus kingsmillii subsp. kingsmillii, Eucalyptus gamophylla and Corymbia hamersleyana (mallee form) on red brown loam and silty loam on hill crests. |
| | HS TwTpTbr Ell Ep | Hummock Grassland of Triodia wiseana, Triodia pungens and Triodia brizoides with Low Open Woodland of Eucalyptus leucophloia subsp. leucophloia over Open Mallee of Eucalyptus pilbarensis on red brown loam on steep hill slopes |
| | ME TpTlo ExAciCh PlApypGoro | Hummock Grassland of Triodia pungens and Triodia longiceps with Low Woodland of Eucalyptus xerothermica, Acacia citrinoviridis and Corymbia hamerselyana over High Shrubland of Petalostylis labicheoides, Acacia pyrifolia var. pyrifolia and Gossypium robinsonii on red brown clay loam on medium drainage lines and surrounding floodplains. |
| | SP TsTwTp EgEt AbApaApr | Hummock Grassland of Triodia sp. Shovelanna Hill (S. van Leeuwen 3835), Triodia wiseana and Triodia pungens with Very Open Mallee of Eucalyptus gamophylla and Eucalyptus trivalva over Open Shrubland of Acacia bivenosa, Acacia pachyacra and Acacia pruinocarpa on red brown sandy loam and clay loam on stony plains. |
| <i>Triodia</i> Open Hummock Grassland | SP TpTm AaExAcao ApaErffAads | Hummock Grassland of Triodia pungens and Triodia melvillei with Low Open Woodland of Acacia aptaneura, Eucalyptus xerothermica and Acacia catenulata subsp. occidentalis and Open Shrubland of Acacia pachyacra, Eremophila forrestii subsp. forrestii and Acacia adsurgens on red brown clay loam or silty loam on stony plains and floodplains. |



The Onshore vegetation consolidation project also identified one Threatened Ecological Community (TEC) and six Priority Ecological Communities (PECs) within the Consolidation Study Area. None of the vegetation associations or landforms identified within the boundary of the Amendment Application Area are associated with a TEC or PEC (Onshore Environmental, 2014). The closest PEC the Weeli Wolli Spring Community (Priority 1) which is approximately 1.5 km west of the Amendment Application Area. The NVCP boundary intersects the buffer of this PEC but there should be no impacts on this PEC based on the proposed activities and the surface water management measures that will be implemented (Section 3.6).

The distinct mapped broad floristic communities and vegetation associations identified within Amendment Application Area extend or occur beyond the project boundary. It is considered unlikely that any changes in vegetation associations and local species over the time since the vegetation consolidation project would lead to elevated significance of the vegetation given that none of the vegetation associations identified within the Amendment Application Area were affiliated with any TECs or PECs and there are no vegetation associations within the Amendment Application Area that would be likely to be included in any updates to TEC or PEC listings.

Vegetation condition within the Amendment Application Area ranges from excellent to Completely Disturbed.

3.4.2 Significant Flora

No species listed under the *Environment Protection and Biodiversity Conservation Act*, 1999 (EPBC Act) or gazetted as Threatened Flora species under the *Biodiversity Conservation Act*, 2016 (BC Act) were identified within the Amendment Application Area.

Twelve Priority Flora have been identified adjacent to the Amendment Application Area (**Figure 3**, **Table 4**):

- Acacia bromilowiana (Priority 4);
- Acacia subtiliformis (Priority 3);
- Eremophila naaykensii (Priority 3);
- Eremophila youngii subsp. lepidota (Priority 4);
- Goodenia sp. East Pilbara (A.A. Mitchell PRP 727) (Priority 3);
- Grevillea saxicola (Priority 3);
- Hibiscus sp. Gurinbiddy Range (M.E. Trudgen MET 15708) (Priority 2);
- Indigofera gilesii (Priority 3);
- Lepidium catapycnon (Priority 4);
- Rhagodia sp. Hamersley (M. Trudgen 17794) (Priority 3);
- Rostellularia adscendens var. latifolia (Priority 3); and
- Triodia sp. Mt Ella (M.E. Trudgen 12739) (Priority 3)

Populations of Priority flora will be avoided using a 10 m buffer, where practicable.

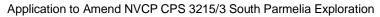


Table 4: Conservation Significant Flora Occurring within the Application Area (Biologic, 2024a; Onshore Environmental, 2012)

| Conservation Significant Species | Description | Habitat Relevance | Potential Impact on Species |
|---|--|---|--|
| Priority 2 (DBCA) | | | |
| Hibiscus sp. Gurinbiddy Range (M.E. Trudgen MET 15708) | Hibiscus sp. Gurinbiddy Range (M.E. Trudgen MET 15708) is a large diffuse perennial shrub 1.5 to 2.5 m tall. It has creamish brown to rusty brown erect starshaped hairs densely covering all vegetative parts so as to appear woolly in texture. Flowers are pale mauve with a darker mauve marking at the base (DPaW and Rio Tinto, 2015). | The current distribution of <i>Hibiscus</i> sp. Gurinbiddy Range (M.E. Trudgen MET 15708) is restricted to the southeast Pilbara. The distribution is likely to be wider with additional survey work (Onshore Environmental, 2015). It is known to occur in sheltered/ shaded rocky drainage lines, gullies and gorges, often below associated cliff-lines or rocky ridges of massive ironstone hills and mountain ranges across the southern Pilbara from Newman to Paraburdoo (Rio Tinto & WAH, 2015; WAH, 1998-). There are currently 27 records for this species, each of which has a corresponding specimen held at WAH (WAH, 1998-). This species has been recorded from: • nine location within the Amendment Application Area; • one location excluded from the Amendment Application Area; • one location in the local region northeast of the Amendment Application Area; and • six locations in the broader Pilbara; and • two additional locations within Karijini National Park. | Low The clearing of the record of this species (if required) within the Amendment Application Area would not result in any significant impact upon species distribution as: The preferred habitat for this species rocky drainage lines, gullies and gorges is typically too dangerous to access for exploration activities and therefore unlikely to be disturbed by the proposed activities under this permit; This species is known from within Karijini National Park; and The species is distributed throughout the south-eastern Pilbara region and is considered likely to have a wider distribution. |
| Priority 3 (DBCA) | | | |
| Acacia subtiliformis | A spindly, slender, single-stemmed, erect shrub, growing to 3.5 m in height (WAH, 1998-). The new growth of this species is slightly viscid, resinous, aromatic and produces yellow flowers in June (Maslin, 2018; WAH, 1998-). | Acacia subtiliformis has been recorded in low, undulating country on calcareous rises adjacent to drainage lines and is known only from the Hamersley Range; specifically the Hancock and Ophthalmia Ranges (WAH, 1998-). This species is relatively widely distributed in the Pilbara and has been recorded from: one location within the Amendment Application Area; and 654 other locations in the Southern Pilbara including: | Low The clearing of the single record of this species (if required) within the Amendment Application Area would not result in any significant impact upon species distribution as: 1. This species is known from within Karijini National Park; and 2. There is a large population of this species to the west of the Amendment Application Area; and 3. Other populations across the southern Pilbara. |
| Eremophila naaykensii | An erect, usually dome-shaped, shrub growing to 3.5 m high (Curtis et al., 2022; WAH, 1998-). It has fibrous, grey bark with short "velvety" hairy branchlets, pale greygreen leaves with a shiny silver appearance, and resinous young leaves. It produces white-cream to pale purple flowers typical of the genus from June to October (Curtis et al., 2022; WAH, 1998). | Eremophila naaykensii typically occurs on a variety of rocky ironstone hillslope landforms, often forming a mid to tall shrub layer, particularly in gully / gorge situations (Curtis et al., 2022; WAH, 1998-). There are currently 22 records for this taxon, confined to the Pilbara and Gascoyne regions (WAH, 1998). Its distribution is quite restricted, occurring sporadically from Newman to Paraburdoo, extending north to central Karijini. However, observed frequency of individuals at locations can be extremely common, with numbers often in the hundreds in 50x50 m floristic sample sites. The Biologic (2024a) study recorded this species in rocky gullies, ridges, cliffs and on ironstone hills and summits mainly in the northern and south-western sections of the Survey Area. This species is relatively widely distributed in the Pilbara and has been recorded from: 15 locations within the Amendment Application Area; four locations the local region and A further 15 locations across the broader Pilbara region; and One record in Karijini National Park. | Low The clearing of any of the records of this species (if required) within the Amendment Application Area would not result in any significant impact upon species distribution as: 1. Key habitat for this species (rocky gullies, ridges, cliffs) are typically too dangerous to access for exploration activities and therefore unlikely to be disturbed by the proposed activities under this permit; 2. This species has a wide distribution across the Pilbara; and 3. This species is known from within Karijini National Park. |
| Goodenia sp. East Pilbara (A.A. Mitchell PRP 727) | Goodenia sp. East Pilbara (A.A. Mitchell PRP 727) is an open erect annual or biennial herb that grows up to 0.2 m in height. This species produces yellow flowers between March and September (WAH, 2016). | Goodenia sp. East Pilbara (A.A. Mitchell PRP 727) occurs in red-brown clay soil with calcrete pebbles on low undulating plains or swampy plains in close proximity to major drainage lines. This species is relatively widely distributed in the southern Pilbara and has been recorded from: 136 locations within the Amendment Application Area 821 locations adjacent to the Amendment Application Area (to the north and north east); and A further 63 locations across the Southern Pilbara between Paraburdoo and Mount Cooke. | Low The clearing of any of the records of this species (if required) within the Amendment Application Area would not result in any significant impact upon species distribution as this species relatively widely distributed in the southern Pilbara. |
| Grevillea saxicola | Grevillea saxicola is a single stemmed tree or tall shrub with grey-black rough bark up to 7 m in height with cream flowers (Onshore Environmental 2015; DPaW and Rio Tinto, 2015). | Based on WA Herbarium records, <i>Grevillea saxicola</i> appears to be restricted to the southern Pilbara. It typically occurs on orange / brown loam soils on steep breakaway and scree slopes (often with southerly aspect) (Onshore Environmental 2015). This species has been recorded from: 18 locations within the Amendment Application Area; 29 locations adjacent to the north and north east of the Amendment Application Area; eight locations within Karijini National Park; and 59 other locations across the broader region. | Low While restricted to the southern Pilbara, the clearing of any of the records of this species (if required) within the Amendment Application Area would not result in any significant impact upon species distribution as: 1. This species is found across the broader southern Pilbara; and 2. This species is known from within Karijini National Park. |



| Conservation Significant Species | Description | Habitat Relevance | Potential Impact on Species |
|---|--|---|---|
| Indigofera gilesii | Indigofera gilesii is a shrub growing up to 1.5 m in height. It produces pink or purple flowers between May and August (Onshore Environmental, 2015). | Indigofera gilesii is widely distributed within the southeast Pilbara (west of Newman) and represented in three other bioregions extending east to the Northern Territory border and south to Wiluna. This species is generally found in pebbly loam amongst boulders and outcrops amongst hills. Within and adjacent to the Amendment Application Area this species has been recorded on rocky hill tops and creek lines. This species has been recorded from: | Low The clearing of any of the records of this species (if required) within the Amendment Application Area would not result in any significant impact upor species distribution as: 1. This appears have a large range (distributed parces four bioregions): |
| | | Five locations within the Amendment Application Area; | This species has a large range (distributed across four bioregions); This species is widely distributed within the southeast Pilbara (west of |
| | | 12 locations adjacent to the Amendment Application Area (to the northeast); | Newman); and |
| | | one location within Karijini National Park; and | 3. This species is known from within Karijini National Park. |
| | | 22 other locations outside of the Amendment Application Area. | |
| Rhagodia sp. Hamersley (M. Trudgen 17794) | Rhagodia sp. Hamersley (M. Trudgen 17794) is a shrub or scrambler species growing to a height of 2 to 4 m. Fruit grows in small red drupelets (DPaW and Rio Tinto, 2015). | Rhagodia sp. Hamersley (M. Trudgen 17794) occurs in orange to red loam soils on flood plains. The current known distribution is restricted to the Pilbara IBRA region with increasing numbers of populations recorded in recent years between Tom Price and Newman. This species has been recorded from: • two locations within the Amendment Application Area; | Low The clearing of any of the records of this species (if required) within the Amendment Application Area would not result in any significant impact upor species distribution as: 1. This species has been recorded in large numbers across the broader southern |
| | | 56 locations adjacent to the Amendment Application Area (to the north and east); | Pilbara region outside of the Amendment Application Area; 2. This species is known from within Karijini National Park. |
| | | one location within Karijini National Park; and | 2. This species is known from within Kanjini National Park. |
| | | more than 1,200 locations across the broader region outside of the Amendment Application Area. | |
| Rostellularia adscendens var. latifolia | Rostellularia adscendens var. latifolia is a low shrub to 0.3 m in height. It has blue-purple-violet flowers in April and May (WAH, 2016). | Rostellularia adscendens var. latifolia grows in ironstone soils in protected areas near watercourses or along shaded rocky ridges, often in dry gullies and gorges (DPaW and Rio Tinto, 2015). At times this species is heavily grazed. While Rostellularia adscendens species is widespread from Africa India and south-East Asia and occurs in all Australian States except Victoria this subspecies is only found in the Pilbara (DPaW and Rio Tinto, 2015). | Low The clearing of any of the records of this species (if required) within the Amendment Application Area would not result in any significant impact upor species distribution as: 1. This species is widely distributed within the southeast Pilbara (west of |
| | | This species has been recorded from: | Newman). |
| | | 9 locations within the Amendment Application Area; | 2. there are five records of this species within Karijini National Park; and |
| | | five locations within Karijini National Park; and | 3. This species has been recorded from 239 other locations across the broader region outside of the Amendment Application Area. |
| Triadia an Mt Ella | Triadia an MA Fila (M. F. Trudgen 12720) is a | 239 other locations across the broader region outside of the Amendment Application Area. Triadia an Mt File (M.F. Trudges 13730) across proposed region outside and autorope and fill along a red grafting and installed and autorope and fill along a red grafting and installed area. | |
| Triodia sp. Mt Ella (M.E. Trudgen 12739) | Triodia sp. Mt Ella (M.E. Trudgen 12739) is a diffuse, loose sprawling, rather than rounded perennial hummock grass to 1.5 m wide to 0.4 m in height, which flowers between May | Triodia sp. Mt Ella (M.E. Trudgen 12739) occurs amongst rocks and outcrops on hill slopes and gullies on light orange brown pebbly loam (Onshore Environmental, 2015). It has been recorded from the Gascoyne, Little Sandy Desert and Pilbara bioregions (WAH, 2016) and is considered to be geographically restricted and uncommon, but unlikely to be rare (Trudgen, 1998 in Onshore Environmental, 2015). | Low The clearing of any of the records of this species (if required) within the Amendment Application Area would not result in any significant impact upor species distribution as: |
| | and August (DPaW and Rio Tinto, 2015). | This species has been recorded from: | This species has been recorded in large numbers across the broader southern |
| | | • Seven | Pilbara region outside of the Amendment Application Area; |
| | | 14 locations within the Amendment Application Area; | 2. This species is known from within Karijini and Karlamilyi National Parks. |
| | | four areas excluded from the Amendment Application Area | |
| | | nine locations adjacent to the Amendment Application Area (to the north and northeast); | |
| | | six locations within Karijini National Park; | |
| | | one location within Karlamilyi National Park; and | |
| | | more than 350 other locations across the southern Pilbara and northern Gascoyne regions. | |
| Priority 4 (DBCA) | | | |
| Acacia bromilowiana | Acacia bromilowiana is a tree / shrub typically growing to 6 m but can reach up to 12 m in favourable areas. It has dark grey fibrous bark with leafstalks that are covered in a grey/blue powdery wax coating. It has | Acacia bromilowiana occurs on red skeletal stony loam, orange-brown pebbly, gravel loam, laterite, banded ironstone and basalt and is typically found on rocky hills, breakaways, scree slopes, gorges and creek beds of the Southern Pilbara (WAH, 2016). This species has been recorded from: | Low The clearing of a single record of this species (if required) within the Amendment Application Area would not result in any significant impact upon species distribution as: 1. There are four records of this appears within Karijini National Park; and |
| | yellow/pink flowers between July and August | one location within the Amendment Application Area; four locations within Kariiini National Parks and | There are four records of this species within Karijini National Park; and This species has been recorded from 59 other locations across the broader |
| | (WAH, 2016). | four locations within Karijini National Park; and 59 other locations across the southern Pilbara. | southern Pilbara outside of the Amendment Application Area. |
| Eromonhilo vermeii | Eremophila youngii subsp. lepidota is a | 59 other locations across the southern Pilbara. Eremophila youngii subsp. lepidota occurs on stony red sandy loam and is typically found on flat plains, | Low |
| Eremophila youngii subsp. lepidota | dense, spreading shrub growing from 1 to 3 m high. It has purple-red-pink flowers | floodplains, sometimes semi-saline, clay flats(WAH, 2016) This species has been recorded from: | The clearing of a single record of this species (if required) within the Amendment Application Area would not result in any significant impact upon species |
| | between January to March or June to September (WAH, 2016). | one location within the Amendment Application Area; and | distribution as this species has been recorded from 465 other locations across the broader southern Pilbara outside of the Amendment Application Area |



| Conservation Significant Species | Description | Habitat Relevance | Potential Impact on Species |
|----------------------------------|--|---|--|
| Lepidium catapycnon | Lepidium catapycnon is an open, woody perennial herb / shrub growing between 0.2 to 0.3 m high with distinctive zigzag stems with white flowers in October (DPaW and Rio Tinto, 2015). | Lepidium catapycnon occurs on skeletal soils in open woodland in usually hilly areas, more frequently on south facing slopes (DPaW and Rio Tinto, 2015) in the southern Pilbara (WAH, 2016). Lepidium catapycnon has been identified as a pioneer species that responds rapidly to disturbance, especially fire (Onshore Environmental, 2013). The majority of known populations of this species have been recorded in areas that were recently burnt. This species has been recorded from: 341 locations within the Amendment Application Area 347 locations adjacent to the Amendment Application Area (to the north and north east); 45 locations within Karijini National Park; and Over 400 other locations across the southern Pilbara. | Low The clearing of any of the records of this species (if required) within the Amendment Application Area would not result in any significant impact upon species distribution as: This species has been recorded broadly across the southern Pilbara outside of the Amendment Application Area. This species is known from within Karijini National Park; and This species is a disturbance opportunist. |



3.4.3 Weeds

Seven introduced flora species (weeds) have been recorded within the Amendment Application Area (**Table 5**). Control of established weed populations will be carried out according to BHP's standard *Weed Control and Management Procedures*.

Table 5 Introduced Flora of the Amendment Application Area

| Species | Common Name | DPAW Rating (DPAW, 2016) | Declared Pest ¹ |
|------------------------|----------------------|-----------------------------|-------------------------------|
| *Bidens bipinnata | Bipinnate Beggartick | Unknown and Rapid | No |
| *Cenchrus ciliaris | Buffel Grass | High and Rapid | No |
| *Cenchrus setiger | Birdwood Grass | High and Rapid | No |
| *Flaveria trinervia | Speedy weed | Unknown | No |
| *Malvastrum americanum | Spiked Malvastrum | High and Rapid | No |
| *Setaria verticillata | Whorled Pigeon Grass | High and Rapid | No |
| *Vachellia farnesiana | Mimosa Bush | High and Rapid | No |

3.4.4 Fauna Habitats and Significant Fauna

Biologic (2024b) identified the following nine vertebrate fauna habitats within the Amendment Application Area (**Figure 4**):

- Calcrete Plain: The Calcrete Plain fauna habitat includes areas where some solid sheets of calcrete were present, but more commonly soils in this habitat were shallow red loams with calcrete rubble. The vegetation occurring differs from that of the surroundings, presumably due to the differences in soil type. Trees are isolated and the shrub layer tends to be sparse, with a low hummock grassland (*Triodia* sp.) dominant.
- Stony Plain: Comprises low-lying open plains and the rolling hills below upland areas, with very slight to no gradient. The substrate consists of gravel and pebbles, with vegetation dominated by *Triodia* and scattered Mulga, eucalpyt and *Acacia* trees, with patches of various small to medium shrub species
- Hillcrest/ Hillslope: Comprises a rocky substrate, often with exposed bedrock, on moderate
 to steep slopes leading into lower footslopes. This habitat was characterised by steep slopes
 with a high proportion of coarse fragments dominated by ironstone. These can contain cracks
 and crevices. Instances of Gorge/ Gully is contained within this habitat. This habitat is usually
 dominated by open *Eucalyptus* woodlands, *Acacia* and *Grevillea* scrublands and *Triodia* low
 hummock grasslands.
- **Breakaway/ Cliff:** Comprises single sided rock faces within steep mid-upper slopes with bare rock outcrops or cliffs (not the entire slope).
- Gorge/ Gully: Characterised by rugged, steep-sided valleys incised into the surrounding landscape. Gorges are deeply incised with vertical cliff faces, while gullies are more open (but not as open as Minor Drainage Lines). Caves and rock pools are most often encountered in this habitat type. Vegetation can be dense and complex in areas of soil deposition or sparse and simple where erosion has occurred.
- Drainage Area/ Floodplain: Lower lying plain often subjected to sheet flow following large rainfall events. Vegetation and substrates of this habitat was variable, often comprising scattered Eucalyptus over Acacia and/or Grevillea shrubs with an understory dominated by Triodia hummock grasses and/or mixed tussock grasses on alluvial substrates, often with heavy clays and gravel. Tussock grasses can be dominant within Drainage Area/ Floodplain habitat as a result of high rainfall events.
- **Minor Drainage Line:** Usually lacks a tall dense upper storey, but with a dense mid storey, including sparse *Eucalyptus* sp., and *Acacia* sp. over tussock grasses and *Triodia* sp. hummock grasses.
- Major Drainage Line: Comprises scattered Eucalyptus and Acacias, or mulga woodland, with
 an understory dominated by tussock grasses. The structure and condition of vegetation often
 varies seasonally, particularly following rainfall events. Vegetation condition often subject to
 heavy cattle grazing. This habitat type is prone to pooling and ponding in areas. Also supports

¹ Biosecurity and Agriculture Management Act, 2007 (BAM Act) s22



the Weeli Wolli PEC, which has groundwater dependent vegetation species including silver cadjeput (*Melaleuca argentea*).

• **Mulga Woodland:** Comprises stands of mulga (*Acacia aneura*) over clay or stony substrates. Differs from other plains by having a monoculture of mulga compared to a diversity of other Acacia species.

The surveys undertaken across the Amendment Application Area have resulted in two fauna species of significance being recorded from within the Amendment Application Area (**Figure 5**):

- Liasis olivaceus subsp. barroni (Pilbara Olive Python) (EPBC Act and BC Act Vulnerable); and
- Pseudomys chapmani (Western Pebble-mound Mouse) (DBCA Priority 4).

One fauna species has been recorded from solely from habitat features which have been excluded from the Amendment Application Area. Given the proximity of the habitat features and the highly mobile nature of these species they are considered to be recorded within the Amendment Application Area:

Macroderma gigas (Ghost Bat) (EPBC Act and BC Act Vulnerable).

Based on the occurrence of the habitat types and significant fauna species previously recorded in the vicinity an additional seven species are considered to potentially occur within the Amendment Application Area (i.e. those considered 'likely' or 'possible' to occur within the Amendment Application Area):

- Anilios ganei (Pilbara Flat-headed Blind-snake) (DBCA Priority 1);
- Apus pacificus (Fork-tailed Swift) (EPBC Act and BC Act Migratory);
- Dasycercus blythi (Brush-tailed Mulgara) (DBCA Priority 4);
- Dasyurus hallucatus (Northern Quoll) (EPBC Act and BC Act Endangered);
- Falco hypoleucos (Grey Falcon) (EPBC Act and BC Act Vulnerable);
- Falco peregrinus (Peregrine Falcon) ('Other Specially Protected Fauna' BC Act); and
- Rhinonicteris aurantia (Pilbara Leaf-nosed Bat) (EPBC Act and BC Act Vulnerable).

An assessment of the potential impact of the proposed clearing on the species of significant fauna that may occur in the application amendment area is provided in **Table 6**.



Table 6 Significant Fauna Potentially Occurring within the Amendment Application Area

| Significant Species | Conservation Status | Distribution and Ecology | Habitat Relevance | Likelihood | Potential Impact on Species |
|--|--|---|--|------------|---|
| Birds | | | | | |
| Fork-tailed Swift (Apus pacificus) | Migratory (EPBC Act) Schedule 5 (BC Act) | The Fork-tailed Swift breeds in north-east and east Asia, wintering in Australia and southern New Guinea (Johnstone and Storr, 1998). Fork-tailed Swifts are entirely aerial within the Pilbara and may forage sporadically over the Amendment Application Area in the summer months, associated with thunderstorms and cyclonic systems (Johnstone and Storr, 1998). | The Fork-tailed Swift is largely an aerial species and has a broad distribution across much of Western Australia. It is viewed as a nomadic species and may fly over the Amendment Application Area. | Likely | Negligible As this species is entirely aerial and not reliant on terrestrial habitats, the impact to this species is considered to be negligible. |
| Grey Falcon (<i>Falco</i> <i>hypoleucos</i>) | Vulnerable (EPBC Act) Vulnerable (BC Act) | The Grey Falcon occurs at low densities across inland Australia. This species frequents timbered lowlands, particularly Acacia shrublands that are crossed by tree-lined drainage systems (Threatened Species Scientific Committee, 2020). The species also frequents spinifex and tussock grassland. | This species has not been recorded however possible nesting habitat occurs for this species in the large trees found in the Minor and Major Drainage Line habitat of the Amendment Application Area. This species may also forage within the drainage line and other broader habitats of the Amendment Application Area | Possible | The proposed clearing activities will have negligible impact on the Grey Falcon as: This species has not been recorded in the Amendment Application Area; Disturbance within the Minor and Major Drainage Line habitat (potential nesting habitat) will be minimised; Its key habitats occur extensively throughout the Pilbara; and this species ability to egress from the area. |
| Peregrine Falcon (<i>Falco</i> peregrinus) | Other Specially Protected Fauna (BC Act) | The Peregrine Falcon is uncommon but wide ranging across Australia. They occur mainly along coastal cliffs, rivers and ranges as well as wooded watercourses and lakes. The Peregrine Falcon nests primarily on cliffs, granite outcrops and quarries, and feed mostly on birds (Johnstone and Storr 1998). | There are no suitable breeding sites in the Amendment Application Area for this species. Although it may forage in this area as part of a wider home range. | Possible | Low The proposed clearing activities are unlikely to impact on the Peregrine Falcon as it has the ability to egress from areas being disturbed. More suitable habitat for this species occurs outside of the Amendment Application Area. |
| Mammals | | | | | |
| Brush-tailed Mulgara (<i>Dasycercus</i> <i>blythi</i>) | Priority 4 (DBCA) (only Brush-tailed Mulgara) | Brush-tailed mulgaras occur in a range of vegetation types, however, the principal habitat is mature hummock grasslands of spinifex, especially <i>Triodia basedowii</i> and <i>T. pungens</i> (Masters <i>et al.</i> , 2003). Note: Woolley, et. al. (2013) noted that the Crest-tailed Mulgara (<i>Dasycercus cristicauda</i>) is unlikely to occur within the Pilbara. | The preferred habitat for this species (Sandplain habitat) is missing from the Amendment Application Area. This species has been recorded to the north of the Amendment Application which is unlikely to represent an important population for the long-term persistence of the species at a local or regional scale. | Possible | Low The preferred habitat for this species is missing from the Amendment Application Area. There are large areas of Sandplain habitat outside of the Amendment Application Area and in the broader region. Should any active Mulgara burrows are identified they will be avoided using a 10 m buffer, where practicable. |
| Ghost Bat (<i>Macroderma</i> <i>gigas</i>) | Vulnerable (EPBC Act) Vulnerable (BC Act) | Ghost Bats are patchily distributed across most of northern Australia, however the recent contraction in the distribution in central Australia has left the Pilbara population of ghost bats isolated by extensive sandy deserts (Worthington-Wilmer et al., 1994). They are generally associated with Gorge / Gully or drainage line habitats, requiring an undisturbed cave, deep fissure or disused mine shaft in which to roost. The Ghost Bat forages in areas of open woodland (Churchill, 2008). | The eight suitable and three unsuitable caves for this species have been clipped from the Amendment Application Area with a 100 m buffer. This species may forage over the Drainage Area/ Floodplain, Stony Plain, Gorge/ Gully, Minor Drainage Line and Major Drainage Line habitats of the Amendment Application Area as part of a larger home range. | Recorded | Low All suitable caves have been clipped from the Amendment Application Area. This species is likely to forage over the habitats within the Amendment Application Area and surrounds, however given the nature of the proposed activities the Ghost Bat is unlikely to be impacted from proposed activities. |
| Northern Quoll (Dasyurus hallucatus) | Endangered (EPBC Act) Endangered (BC Act) | Northern Quoll populations occur in six geographical centres around Australia, including: Drummond Range, central Queensland; the wet tropics of Northern Queensland; northern Cape York Peninsula; northern and western Top End, Northern Territory; north Kimberley and the Pilbara, Western Australia (Braithwaite and Griffiths, 1994). Northern Quoll denning habitat in the Pilbara is associated with rocky habitats or riverine habitats with mature Eucalypt trees with hollows (SEWPaC, 2011). | There are three records of the Northen Quoll north of the Amendment Application Area. The Gorge/ Gully, Breakaway/ Cliff and Major Drainage Line habitats provide key foraging and dispersal habitat for the species. Based on the overall scarcity and concentration of records, the species is unlikely to be reliant on the habitats within the Amendment Application Area for long-term persistence at a local and/or regional scale. based on the results of the current survey. Based on the results of the Biologic (2024b) survey, the occurrence of Northern Quoll local region is unlikely to be representative of an important population. | Possible | Low The proposed clearing activities will have negligible impact on the Northern Quoll as: The records of this species north of the Amendment Application Area are not considered to be representative of an important population; and Disturbance within the Gorge/ Gully, Breakaway/ Cliff and Major Drainage Line habitats will be minimised. the proposed area for clearing is small in a regional context. |
| Pilbara Leaf- nosed Bat (<i>Rhinonicteris</i> aurantius) | Vulnerable (EPBC Act) Vulnerable (BC Act) | The Pilbara Leaf-nosed Bat requires deep caves or disused mine shafts in which to roost (van Dyck and Strahan, 2008), at least in the dry season. These bats have been recorded in isolated populations in the Pilbara, and are present only where suitable roosting niches are available. They are generally sparsely distributed. The Pilbara Leaf-nosed Bat forages in areas of open woodland (Churchill, 2008). | While all known potential bat caves have been clipped from the Amendment Application Area, none of these caves are considered suitable as a permanent or semi-permanent roosts for the Pilbara Leaf-nosed Bat. This species may forage over parts of the Amendment Application Area sporadically as part of a larger home range. | Possible | Low This species may forage over the habitats within the Amendment Application Area and surrounds. No suitable roosting habitat has been identified within the Amendment Application Area and therefore the Pilbara Leaf-nosed Bat would not be dependant on the habitats present within the Amendment Application Area and are therefore unlikely to be impacted from proposed activities. |



Application to Amend NVCP CPS 3215/3 South Parmelia Exploration

| Significant Species | Conservation Status | Distribution and Ecology | Habitat Relevance | Likelihood | Potential Impact on Species |
|--|--|---|---|------------|--|
| Western Pebble-mound mouse (<i>Pseudomys</i> <i>chapmani</i>) | Priority 4 (DBCA) | The Western Pebble-mound Mouse is restricted to the Pilbara region, where it is recognised as an endemic species. Abandoned mounds to the east of its current range indicate a decline in distribution (Menkhorst and Knight, 2004). Abandoned mounds in disturbed areas suggest that the species is under threat by grazing and mining activities. The construction of extensive pebble mounds, built from small stones, which typically cover areas from 0.5-9.0 square metres, is characteristic of this species. Mounds are restricted to suitable class stones, and are usually found on gentle slopes and spurs (van Dyck and Strahan, 2008). | This species is common in the Hill Crest / Hill Slope habitat of the local and regional area. There are 17 records of this species within the Amendment Application Area. | Recorded | Low This species was recorded and typically occurs within the Hill Crest / Hill Slope habitats within the Amendment Application Area. While the Hill Crest / Hill Slope is utilised by the Western Pebble-mound Mouse, the proposed area for clearing is small in a regional context and is contiguous with habitats in the local and regional area. Active Pebble- mouse mounds will be avoided using a 10 m buffer, where practicable. |
| Reptiles | | | | | |
| Pilbara Flat- headed Blind Snake (<i>Anilios ganei</i>) | Priority 1 (DBCA) | The Pilbara Flat-headed Blind Snake is a moderately robust blind snake known from widely separated areas between Newman and Pannawonica. A very cryptic species. Most often recorded in rocky or stony areas and considered to be possibly associated with moist gorges and gullies (Wilson and Swan, 2010) | Suitable habitat for this species occurs in the Amendment Application Area, although limited records make habitat relevance hard to assess. However a recording was made by Outback Ecology (2009) within an alluvial floodplain. This habitat type (Drainage Area / Floodplain) occurs in the Amendment Application Area. The Hill Crest / Hill Slope habitats of the Amendment Application Area may also provide suitable habitat for this species, so it may disperse and forage through the Amendment Application Area. | Possible | It is possible that the grading of access tracks and drill pads may result in a localised impact on this species' habitat. Any potential impact is likely to be moderated by the minimal disturbance associated with the clearing activities, and extensive undisturbed areas. Given the regional distribution of Pilbara Flat-headed Blind Snake, the loss of some habitat from the proposed clearing associated with the Amendment Application Area is considered as being low when compared to the expansive areas of suitable habitat remaining and throughout in the Pilbara. |
| Pilbara Olive Python (<i>Liasis</i> <i>olivaceus</i> <i>barroni</i>) | Vulnerable (EPBC Act) Vulnerable (BC Act) | The Pilbara Olive Python's range is restricted to the Pilbara region, north Western Australia and the Dampier Archipelago. Habitat consists of rocky escarpments, gorges and waterholes within the Pilbara Region. The preferred microhabitat for this species are under rock piles, on top of rocks and under spinifex as well as in artificial features such as overburden heaps, railway embankments an sewerage treatment ponds. The species' breeding season occurs from June to August, with males moving long distances in search of breeding females (Wilson and Swan, 2017). | This species may utilise the Drainage Area / Floodplain habitat of the Amendment Application Area in a transitory nature when conditions are suitable. | Recorded | Low The impact upon this species is likely to be low as there are larger areas of suitable rocky habitat and drainage line habitat in a similar or better condition adjacent to the Amendment Application Area and in the wider area. |



3.5 GROUNDWATER

The Amendment Application Area is located in the Pilbara Groundwater Area, proclaimed under the Rights in Water and Irrigation Act 1914 (RIWI Act) (DoW, 2009a).

There are two main aquifers within the Amendment Application Area:

Hamersley – Fractured Rock Aquifer which is described as: "The Precambrian rocks of the Hamersley Basin are principally volcanics, shales and iron formations. Groundwater is contained within fractures within these rocks. The groundwater level may be deep below the surface, and is generally fresh. The main use of this aquifer is for mining and mine dewatering from iron ore mines. Bores have also been drilled for road and railway construction. There will be increasing dewatering from the fractured rocks around iron ore mines as the pits become deeper (DoW, 2015)".

Hamersley – Wittenoom Aquifer: The Wittenoom aquifer is distinguished as a separate aquifer system because the Wittenoom Dolomite is distinct from the other fractured rock aquifers in the Hamersley Basin, having karst development (solution cavities) and being overlain by a thick sequence of valley filled sediments consisting of pisolite, calcrete and alluvium. The Wittenoom Dolomite is the most important aquifer in the province and underlies the main valleys in the Hamersley Range; it is highly transmissive and high yielding where there is karst development. Water levels may be fairly deep. The groundwater is generally fresh. The aquifer has been developed for Tom Price and Marandoo water supply and has been investigated at other localities. There is likely to be significant development pressure on this aquifer for supply to iron ore operations (DoW, 2015b)

3.6 SURFACE WATER

The Amendment Application Area is situated in the Pilbara Surface Water Area, proclaimed under the RIWI Act (DoW, 2009b).

There is one named non-perennial creek, Weeli Wolli Creek, which runs across the north west corner of the application Area. Existing cleared tracks will be used to cross Weeli Wolli Creek.

There are also multiple unnamed non-perennial drainage lines that flow predominately to the north across the Amendment Application Area before joining Weeli Wolli Creek. Where practicable, existing cleared tracks will be used to cross the unnamed non-perennial minor drainage line. If it is necessary for new crossings to be installed, clearing will be kept to a bare minimum and will be constructed flat level to the surface (i.e. a simple clearing with no bunds) to maintain the natural surface flow.

4 ENVIRONMENTAL MANAGEMENT

The management of the environmental aspects of BHP's operations at the Amendment Application Area are managed under the company's AS/NZS ISO 14001:2004 certified Environmental Management System (EMS). The EMS describes the organisational structure, responsibilities, practices, processes and resources for implementing and maintaining environmental objectives at all BHP sites

Additionally, operational controls for environmental management for the Project area are guided by BHP's Charter values. The Charter Values outline a commitment to develop, implement and maintain management systems for sustainable development that drive continual improvement and set and achieve targets that promote efficient use of resources. In order to give effect to the Charter Values, a series of Our Requirements Documents have been developed.

BHP has also developed a Sustainable Development Policy for its operations. The Sustainable Development Policy outlines a commitment to setting objective and targets to achieve sustainable outcomes and to continually improve our performance.

BHP also has an internal Project Environmental and Aboriginal Heritage Review (PEAHR) Procedure. The purpose of the procedure is to manage implementation of environmental, Aboriginal heritage, land tenure and legal commitments prior to and during land disturbance. All ground disturbance activities will meet the requirements of the PEAHR procedure, all relevant legislative and regulatory requirements, the BHP Charter, industry standards, and codes of practice.

All personnel carrying out works associated with clearing activities are required to comply with BHP's Charter Values, BHP's Our Requirements, and relevant legislative and licensing requirements.



5 PROJECT COMPLIANCE WITH THE TEN CLEARING PRINCIPLES

BHP considers that native vegetation clearing within the Amendment Application Area will not result in any significant environmental or social impacts, and complies with the Ten Clearing Principles, as defined in Schedule 5 of the EP Act. **Section 6** provides an assessment of project compliance with the Ten Clearing Principles.



6 ASSESSMENT AGAINST THE TEN CLEARING PRINCIPLES

The information used to assess the application against the Ten Clearing Principles has been based on the findings of multiple baseline surveys (**Section 3**).

6.1 PRINCIPLE A

Native vegetation should not be cleared if it comprises a high level of biological diversity

This proposal is not likely to be at variance to this Principle.

Similar habitat to the Amendment Application Area is located outside the Amendment Application Area. These other areas of similar vegetation type are therefore expected to have a similar biological diversity and conservation value than that of the Amendment Application Area.

The proposed clearing is therefore unlikely to have any significant impact on the biodiversity of the region.

Table 7 provides an assessment of the proposed clearing activities within the Amendment Application Area against the components of clearing Principle A.



 Table 7
 Assessment against Principle A components

| Principle | Criteria | Assessment | Outcome |
|--|--|---|--|
| a) Native vegetation should not be cleared if it comprises a high level of biological diversity. | a1) Native vegetation should not be cleared if it is representative of an area of outstanding biodiversity in the Bioregion. | The native vegetation within the Amendment Application Area is represented in the same condition within the broader region and is not considered to be of outstanding biodiversity in the Bioregion. | Not at variance with clearing principle. |
| | a2) Native vegetation should not be cleared if it has higher diversity of indigenous aquatic or terrestrial plant or fauna species than native vegetation of that ecological community in good or better condition in the Bioregion. | The native vegetation within the Amendment Application Area is in the same condition as other areas of similar vegetation type within the broader region. | Not at variance with clearing principle. |
| | a3) Native vegetation should not be cleared if it has higher diversity of indigenous aquatic or terrestrial plant or fauna species than the remaining vegetation of that ecological community in the local area. | The native vegetation within the Amendment Application Area is not considered to have higher biodiversity and conservation value than that of the surrounding vegetation within the local area. | Not at variance with clearing principle. |
| | a4) Native vegetation should not be cleared if it has higher ecosystem diversity than other native vegetation of that local area. | The native vegetation within the Amendment Application Area is not considered to have a higher ecosystem diversity than other native vegetation of that local area. | Not at variance with clearing principle. |
| | a5) Native vegetation should not be cleared if it has higher genetic diversity than the remaining native vegetation of that ecological community. | The native vegetation within the Amendment Application Area is not considered to have a higher genetic diversity than the remaining native vegetation of that ecological community as the vegetation is contiguous with adjacent native vegetation and has no special features. | Not at variance with clearing principle. |
| | A6) Native vegetation should not be cleared if it is necessary for the continued in situ existence of significant habitat for priority flora species published by the Department of Environment and Conservation. | Five Priority flora species have been recorded in the Amendment Application Area. The records of identified Priority flora populations will be avoided using a 10 m buffer where practicable. | Not at variance with clearing principle. |



6.2 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

This proposal is not likely to be at variance to this Principle.

There are nine broad fauna habitat types within the Amendment Application Area (Figure 3).

The vegetation and habitat found within the Amendment Application Area are considered to be well represented in the Pilbara bioregions.

Three fauna species of significance have been recorded from within the Amendment Application Area (or specific exclusion zones) with an additional seven species considered to potentially occur within the Amendment Application Area (**Table 6**). As described in **Section 3.4.4** and **Table 6** clearing of the Amendment Application Area is expected to have a low impact on these species.

Table 8 provides an assessment of the proposed clearing activities within the Amendment Application Area against the components of clearing Principle B.



 Table 8
 Assessment against Principle B components

| Principle | Criteria | Assessment | Outcome |
|---|--|---|---|
| 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. | b1) Native vegetation should not be cleared if it is or is likely to be habitat for fauna that is declared Specially Protected under the BC Act. | Two BC Act protected species have been recorded from the Amendment Application (or specific exclusion zones) and five BC Act protected species are considered 'possible' or 'likely' to occur within the Amendment Application Area (Table 6). The proposed activities are unlikely to have a significant impact on these species as: All species are wide-ranging and found throughout the broader region; There are no key habitat features (caves and waterhole habitats) within the Amendment Application Area; All species are only likely to forage within the Amendment Application Area; These species do not exclusively depend on any habitat type or feature within the Amendment Application Area; and Similar habitat is well represented outside the Amendment Application Area. | Unlikely to be at variance with clearing principle. |
| | b2) Native vegetation should not be cleared if it is or is likely to be habitat for Priority Listed Fauna. | One Priority fauna species have been recorded within the Amendment Application Area with two species considered 'possible' or 'likely' to occur within the Amendment Application Area. As detailed in Table 6 these species are unlikely to be impacted for the following reasons: The preferred habitat for these species is well represented outside the Amendment Application Area; Similar habitat within close vicinity to the Amendment Application Area was found to be the same or better condition than that of the Amendment Application Area; and Active mounds of the Western Pebble-mound Mouse will be avoided using a 10 m buffer, where practicable. | Not at variance with clearing principle. |
| | b3) Native vegetation should not be cleared if it is or is likely to be habitat for fauna that is otherwise significant. | Habitat found within the Amendment Application Area may be suitable for use by conservation significant fauna, however similar habitat in the same or better condition is widespread in the Amendment Application Area surrounds | Not at variance with clearing principle. |
| | b4) Native vegetation should not be cleared if it provides significant habitat for fauna species in the local area. | Habitat within the Amendment Application Area is not considered significant habitat for fauna species within the local area. Similar habitat to that proposed to be cleared is located to the area surrounding of the Amendment Application Area. | Not at variance with clearing principle. |
| | b5) Native vegetation should not be cleared if it maintains ecological functions and processes that protect significant habitat for fauna. | The clearing of native vegetation is not considered to alter ecological functions and processes that protect significant habitat for fauna. | Not at variance with clearing principle. |



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| Principle | Criteria | Assessment | Outcome |
|-----------|---|--|--|
| | b6) Native vegetation should not be cleared if it forms, or is part of, an ecological linkage that is necessary for the maintenance of fauna. | | Not at variance with clearing principle. |
| | b7) Native vegetation should not be cleared if it provides significant habitat for fauna communities (assemblages) and meta- | The Amendment Application Area is not considered to contain significant habitat for faunal assemblages that are not also present in other areas within the vicinity. | Not at variance with clearing principle. |
| | populations. | The Amendment Application Area is not considered likely to contain geographically isolated fauna populations. | |



6.3 PRINCIPLE C

Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, rare flora

This proposal is not likely to be at variance to this Principle.

No species listed under the EPBC Act or gazetted as Threatened under the BC Act were recorded in the Amendment Application Area. Three species listed as Priority Flora by the DBCA have been recorded in the Amendment Application Area (**Section 3.4.2**).

Table 9 provides an assessment of the proposed clearing activities within the Amendment Application Area against the components of clearing Principle C.



 Table 9
 Assessment against Principle C components

| Principle | Criteria | Assessment | Outcome |
|--|---|--|--|
| c) Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, rare flora. | c1) Native vegetation should not be cleared if it is necessary for the continued <i>in situ</i> existence of populations of Threatened Flora under the <i>BC Act 2016</i> | No Threatened flora species were recorded in the Amendment Application Area. | Not at variance with clearing principle. |
| | c2) Native vegetation should not be cleared if it is necessary for the continued <i>in situ</i> existence of other significant flora. | No species listed under the EPBC Act or other significant flora species were recorded in the Amendment Application Area. | Not at variance with clearing principle. |



6.4 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

This proposal is not likely to be at variance to this Principle.

None of the vegetation associations or landforms identified within the boundaries of CPS 3215/3 are associated with a TECs or PECs (Onshore Environmental, 2014). The closest PEC the Weeli Wolli Spring Community (Priority 1) which is approximately 1.5 km west of the Amendment Application Area (**Section 3.4.1**).

The NVCP boundary intersects the buffer of this PEC but there should be no impacts on this PEC based on the proposed activities and the surface water management measures that will be implemented (Section 3.6).

Table 10 provides an assessment of the proposed clearing activities within the Amendment Application Area against the components of clearing Principle D.



 Table 10
 Assessment against Principle D components

| Principle | Criteria | Assessment | Outcome |
|--|--|--|--|
| 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. | d1) Native vegetation should not be cleared if threatened ecological communities listed under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 are present. | No EPBC Act TECs are present in the Amendment Application Area. | Not at variance with clearing principle. |
| | d2) Native vegetation should not be cleared if it is necessary for the maintenance of Threatened Ecological Communities listed under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999. | No EPBC Act TECs or associated native vegetation will be impacted by the proposed works. | Not at variance with clearing principle. |
| | d3) Native vegetation should not be cleared if other significant ecological communities are present. | No significant ecological communities are known to occur or are likely to occur within the Amendment Application Area. | Not at variance with clearing principle. |
| | d4) Native vegetation should not be cleared if it is necessary for the maintenance of other significant ecological communities. | No DBCA listed TECs or associated native vegetation will be impacted by the proposed works. | Not at variance with clearing principle. |
| | d5) Native vegetation should not be cleared if it is necessary for the continued <i>in situ</i> existence of significant examples of priority threatened ecological communities published by the Department of Environment and Conservation. | No DBCA listed PECs or associated native vegetation will be impacted by the proposed works. | Not at variance with clearing principle. |



6.5 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

This proposal is not likely to be at variance to this Principle.

The habitat and vegetation within the Amendment Application Area is well represented in the Land Systems of the region (**Section 3.4.1**), and therefore it is unlikely individual species would be restricted to a particular habitat and vegetation occurring in the Amendment Application Area.

Table 11 provides an assessment of the proposed clearing activities within the Amendment Application Area against the components of clearing Principle E.



 Table 11
 Assessment against Principle E components

| Principle | Criteria | Assessment | Outcome |
|---|--|---|--|
| 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. | e1) Native vegetation should not be cleared if the remaining native vegetation represents less than 30%, or the clearing would reduce the representation of remaining native vegetation to less than 30% in the Bioregion (or subregion where applicable). | Clearing native vegetation within the Amendment Application Area will not reduce the extent of native vegetation below 30% in the bioregion or subregion. | Not at variance with clearing principle. |
| | e2) Native vegetation should not be cleared if an ecological community represents less than 30% of its original extent or clearing would reduce the representation of any ecological community to less than 30% of its original extent in the Bioregion (or subregion where applicable). | Clearing native vegetation within the Amendment Application Area will not significantly reduce the known extent of the ecological community from pre-European extents. Current remaining extents of the vegetation communities in the bioregion are almost 100% of pre-European extents. | Not at variance with clearing principle. |
| | e3) Native vegetation should not be cleared if clearing would reduce an ecological community to less than 1% of the Bioregion (or subregion where applicable) | Clearing native vegetation within the Amendment Application Area will not significantly reduce the known extent of the vegetation community in the bioregion. | Not at variance with clearing principle. |
| | e4) Native vegetation should not be cleared if the remaining native vegetation represents less than 30% or the clearing would reduce the representation of remaining native vegetation to less than 30% in the Local Area. | Clearing native vegetation within the Amendment Application Area will not reduce the representation of remaining native vegetation to less than 30% in the local area. | Not at variance with clearing principle. |
| | e5) Native vegetation should not be cleared if an ecological community represents less than 30% of its original extent or clearing will reduce the representation of any ecological community to less than 30% of its original extent in the Local Area. | Clearing native vegetation within the Amendment Application Area will not reduce the representation of any ecological community to less than 30% of its original extent in the local area. | Not at variance with clearing principle. |
| | e6) Native vegetation should not be cleared if clearing would reduce any ecological community to less than 1% of the Local Area. | Clearing native vegetation within the Amendment Application Area will not significantly reduce the known extent of the vegetation community in the local area. | Not at variance with clearing principle. |



6.6 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

This proposal is unlikely to be at variance to this Principle.

There is one named non-perennial creek, Weeli Wolli Creek, which runs across the north west corner of the application Area. Existing cleared tracks will be used to cross Weeli Wolli Creek.

There are also multiple unnamed non-perennial drainage lines that flow predominately to the north across the Amendment Application Area before joining Weeli Wolli Creek. Where practicable, existing cleared tracks will be used to cross the unnamed non-perennial minor drainage line. If it is necessary for new crossings to be installed, clearing will be kept to a bare minimum and will be constructed flat level to the surface (i.e. a simple clearing with no bunds) to maintain the natural surface flow.

Table 12 provides an assessment of the proposed clearing activities within the Amendment Application Area against the components of clearing Principle F.



 Table 12
 Assessment against Principle F components

| Principle | Criteria | Assessment | Outcome |
|--|---|---|--|
| f) Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland. | f1) Native vegetation should not be cleared if it is growing in a watercourse or wetland that has been identified as having significant environmental values. | No permanent watercourses or wetlands are located within with the Amendment Application Area. There is one named non-perennial creek, Weeli Wolli Creek, which runs across the north west corner of the application Area. Existing cleared tracks will be used to cross Weeli Wolli Creek. There are also multiple unnamed non-perennial drainage lines that flow predominately to the north across the Amendment Application Area before joining Weeli Wolli Creek. Where practicable, existing cleared tracks will be used to cross the unnamed non-perennial minor drainage line. If it is necessary for new crossings to be installed, clearing will be kept to a bare minimum and will be constructed flat level to the surface (i.e. a simple clearing with no bunds) to maintain the natural surface flow. | Not at variance with clearing principle. |
| | f2) Native vegetation should not be cleared if it provides a buffer area for watercourses and wetlands identified in criteria (f1) and (f2). | No permanent watercourses or wetlands are located within with the Amendment Application Area. There is one named non-perennial creek, Weeli Wolli Creek, which runs across the north west corner of the application Area. Existing cleared tracks will be used to cross Weeli Wolli Creek. There are also multiple unnamed non-perennial drainage lines that flow predominately to the north across the Amendment Application Area before joining Weeli Wolli Creek. Where practicable, existing cleared tracks will be used to cross the unnamed non-perennial minor drainage line. If it is necessary for new crossings to be installed, clearing will be kept to a bare minimum and will be constructed flat level to the surface (i.e. a simple clearing with no bunds) to maintain the natural surface flow. | Not at variance with clearing principle. |
| | f3) Native vegetation should not be cleared if water tables are likely to change and adversely affect ecological communities that are wetland or groundwater dependent. | Due to the small scale of clearing this project is not considered likely to adversely alter water tables, and as such will not impact on any ecological communities that are wetland or groundwater dependent. | Not at variance with clearing principle. |



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| Principle | Criteria | Assessment | Outcome |
|-----------|---|--|--|
| | f4) Native vegetation should not be cleared if it is growing in other watercourses or wetlands. | No permanent watercourses or wetlands are located within with the Amendment Application Area or in association with any other immediate watercourses or wetland in the surrounding area. | Not at variance with clearing principle. |



6.7 PRINCIPLE G

Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation

This proposal is not likely to be at variance to this Principle.

Land degradation may include impacts such as erosion, changes to pH, water logging, salinisation or spread of weeds. These potential impacts are assessed in the sections below. **Table 13** provides an assessment of the proposed clearing activities within the Amendment Application Area against the components of clearing Principle G.

Given the relatively small amount of clearing required for the project, the proposed management strategies for weed species within the Amendment Application Area and the low susceptibility of the soils to erosion, it is considered that the project will not be at variance to Principle G.

6.7.1 Erosion

It is not anticipated that the removal of vegetation will contribute to increased amounts of wind or water erosion in the Amendment Application Area or adjacent areas.

6.7.2 Changes to pH

The Amendment Application Area is not in an area at risk of acid sulphate soils and there are no recorded acid sulphate soils within the Amendment Application Area. It is not expected that the proposed clearing will result in changes to soil pH.

6.7.3 Water logging and salinisation

It is not expected that there will be a significant reduction in groundwater uptake due to the proposed clearing. No water logging or increased salinisation is expected to occur as a result of the proposed clearing.

6.7.4 Weeds

Seven introduced flora species have been recorded in the Amendment Application Area (**Table 4**). None are listed as a Declared Pest under the BAM Act. These are typical introduced species commonly recorded in the Pilbara region.

Control of established weed populations will be carried out according to the *BHP Weed Control and Management Procedure*.



Table 13 Assessment against Principle G components

| Principle | Criteria | Assessment | Outcome |
|---|--|--|---|
| g) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation. | g1) Native vegetation should not be cleared if wind or water erosion of soil is likely to be increased (on or off site). | Soil erosion is not anticipated to occur as any areas cleared will be revegetated where practicable, if not required for infrastructure. | Not considered to be at variance with clearing principle. |
| | g2) Native vegetation on land with soils with high or low pH should not be cleared. | The Amendment Application Area is not considered to contain soils at risk of having acid sulphate soils present. No vegetation on soils with significantly low (or high) pH will be impacted by the proposed works. | Not at variance with clearing principle. |
| | g3) Native vegetation should not be cleared if water logging is likely to be increased (on or off site). | It is not expected that water logging would be increased by the clearing of native vegetation within the Amendment Application Area. | Not at variance with clearing principle. |
| | g4) Native vegetation should not be cleared if land salinisation is likely to be increased (on or off site). | Soil salinity is not considered to be increased in the Amendment Application Area (on or off site) by the clearing of native vegetation. | Not at variance with clearing principle. |



6.8 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

This proposal is not likely to be at variance to this Principle.

The Amendment Application Area is not within any conservation areas as listed by the DBCA or those protected under the EPBC Act. The closest conservation area is Karijini National Park which is more than 50 km west of the Amendment Application Area.

The Amendment Application Area is not considered to form an ecological linkage to these conservation areas.

An assessment of the proposed clearing activities within the Amendment Application Area against the components of clearing Principle H is provided in **Table 14** below.



 Table 14
 Assessment against Principle H components

| Principle | Criteria | Assessment | Outcome |
|---|---|--|--|
| 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. | h1) Native vegetation should not be cleared if it contributes significantly to the environmental values of a conservation area. | The vegetation of the Amendment Application Area does not contribute to the environmental values of a conservation area. | Not at variance with clearing principle. |
| | h2) Native vegetation should not be cleared if that vegetation provides a buffer to a conservation area. | There are no conservation areas within the vicinity of the Amendment Application Area. | Not at variance with clearing principle. |
| | h3) Native vegetation should not be cleared if the land contributes to an ecological linkage to a conservation area. | The nearest conservation area is 50 km west of the Amendment Application Area. | Not at variance with clearing principle. |
| | h4) Native vegetation should not be cleared if it provides habitats not well represented on conservation land. | There are no habitats within the Amendment Application Area that are not well represented on conservation land. | Not at variance with clearing principle. |



6.9 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

This proposal is not likely to be at variance to this Principle.

Appropriate surface water management practices will be implemented to minimise erosion and minimise potential impacts on the quality of surface water. The clearing is unlikely to cause deterioration in the quality of any surface or underground water.

Existing cleared tracks will be used to cross Weeli Wolli Creek.

Where practicable, existing cleared tracks will be used to cross the unnamed non-perennial minor drainage line. If it is necessary for new crossings to be installed, clearing will be kept to a bare minimum and will be constructed flat level to the surface (i.e. a simple clearing with no bunds) to maintain the natural surface flow.

Table 15 provides an assessment of the proposed clearing activities within the Amendment Application Area against the components of clearing Principle I.



Table 15 Assessment against Principle I components

| Principle | Criteria | Assessment | Outcome | |
|---|---|---|--|--|
| 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. | i1) Native vegetation should not be cleared if clearing the vegetation will reduce the quality of surface or underground water in proclaimed, gazetted or declared areas or catchments. | The clearing of native vegetation is not considered likely to alter the quality of surface or ground water within the Amendment Application Area due to the limited nature of the clearing within the Amendment Application Area. | Not at variance with clearing principle. | |
| | i2) Native vegetation should not be cleared if sedimentation, erosion, turbidity or eutrophication of water bodies on or off site is likely to be caused or increased. | Localised erosion will not impact any waterbodies as clearing will be restricted to a bare minimum near surface water features and cleared areas that are no longer required will be revegetated. | Not at variance with clearing principle. | |
| | i3) Native vegetation should not be cleared if water tables are likely to change significantly altering salinity or pH. | The clearing of native vegetation is not considered likely to alter the quality of surface or ground water within the Amendment Application Area. | Not at variance with clearing principle. | |
| | i4) Native vegetation should not be cleared if the clearing is likely to alter the water regimes of groundwater-dependent ecosystems on or off site, causing degradation to the biological communities associated with these systems. | The clearing of native vegetation is not considered likely to alter the regimes of surface or groundwater dependent vegetation within the vicinity of the Amendment Application Area. | Not at variance with clearing principle. | |



6.10 PRINCIPLE J

Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding

This proposal is not likely to be at variance to this Principle.

Massive surface water runoff and localised flooding occurs following intense rainfall events during December to April. However, the incidence or intensity of flooding is not likely to be significantly influenced by the proposed vegetation clearing. It is highly improbable that surface runoff generated from the cleared area could create sufficient concentrated water volumes to cause even a localised flood event. Drainage infrastructure will be designed to ensure that post-construction flows will not differ significantly from pre-construction flows. Therefore the proposed clearing is unlikely to cause or exacerbate the incidence or intensity of flooding.

Table 16 provides an assessment of the proposed clearing activities within the Amendment Application Area against the components of clearing Principle J.



 Table 16
 Assessment against Principle J components

| Principle | Criteria | Assessment | Outcome |
|---|---|---|--|
| j) Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence of flooding. | j1) Native vegetation should not be cleared if it is likely to lead to an incremental increase in peak flood height. | The clearing of native vegetation is not considered likely to cause any alteration to peak flood height. | Not at variance with clearing principle. |
| | j2) Native vegetation should not be cleared if it is likely to lead to an incremental increase in duration of flood peak. | The clearing of native vegetation is not considered likely to cause any impact on duration of flood peak. | Not at variance with clearing principle. |



7 HERITAGE

The Land Access Unit is the internal group within BHP that manages Aboriginal heritage matters. The Land Access Unit is responsible for ensuring that BHP complies with the *Aboriginal Heritage Act*, 1972, and all other state and federal heritage legislation. All land disturbance activities are subject to ethnographic and archaeological surveys as part of an internal PEAHR. The PEAHR process ensures that all heritage sites in the vicinity of the Project Area are identified and avoided where practicable.

The Amendment Application Area is located within the Nyiyaparli People Native Title Claim (WC2005/006). Ethnographic and archaeological surveys of the Application Area have been conducted in consultation with the Nyiyaparli people. A number of heritage sites were identified within the Amendment Application Area (site details are not provided here out of respect of the wishes of the Traditional Owners).

If any heritage site cannot practicably be avoided, BHP Iron Ore would consult the relevant traditional owners and seek approval under the *Aboriginal Heritage Act 1972* before the site is disturbed.

8 CONCLUSION

The proposed clearing in the Amendment Application Area is unlikely to be at variance to any of the Ten Clearing Principles. CPS 3215/3 authorises the clearing of up to 200 ha. To date BHP has cleared 29.91 ha and the clearing of a further 170.09 ha within an Amendment Application Area of 4,616.73 ha is unlikely to have any significant negative impacts on biodiversity and environmental values in the area.



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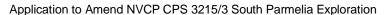
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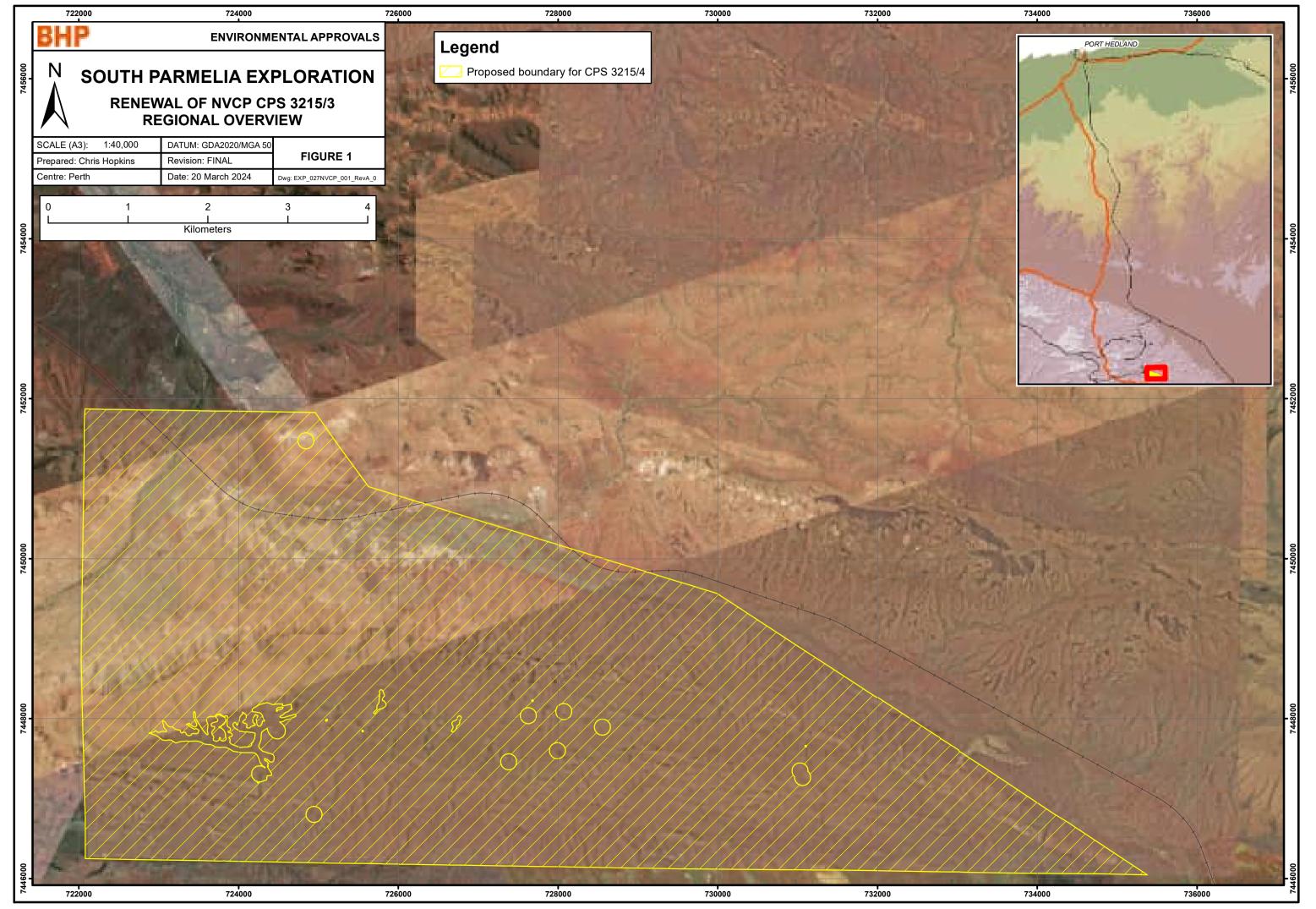
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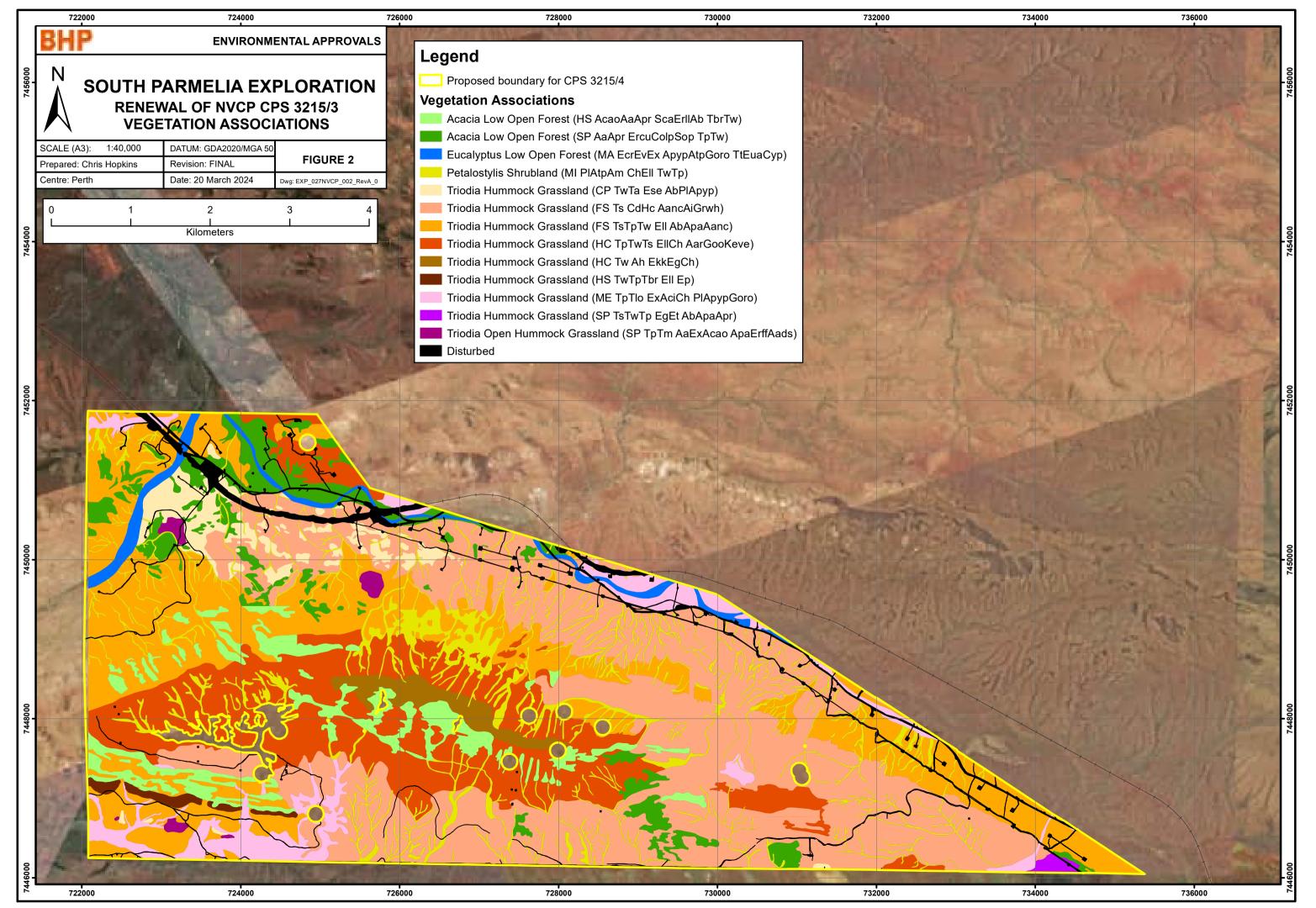
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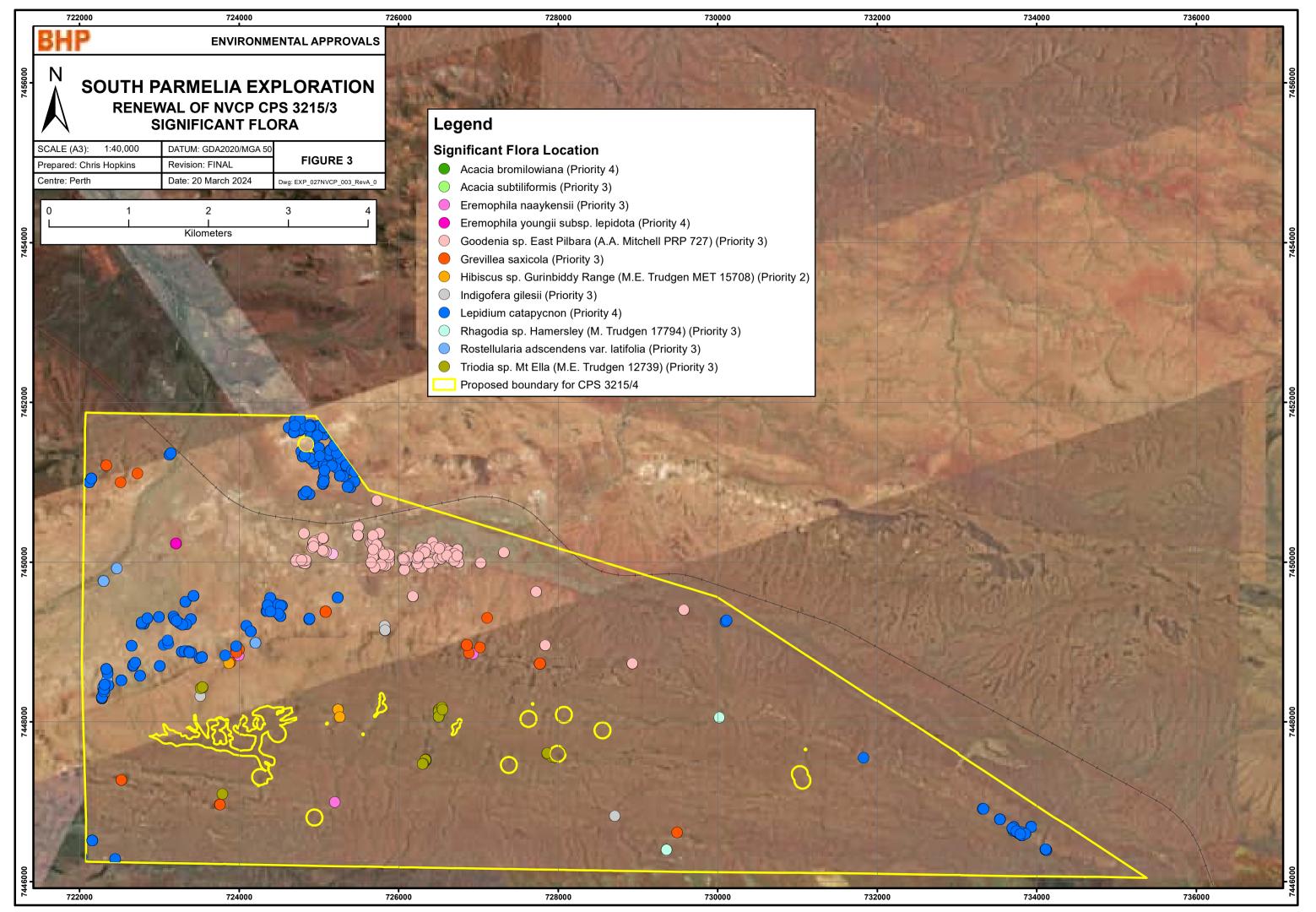
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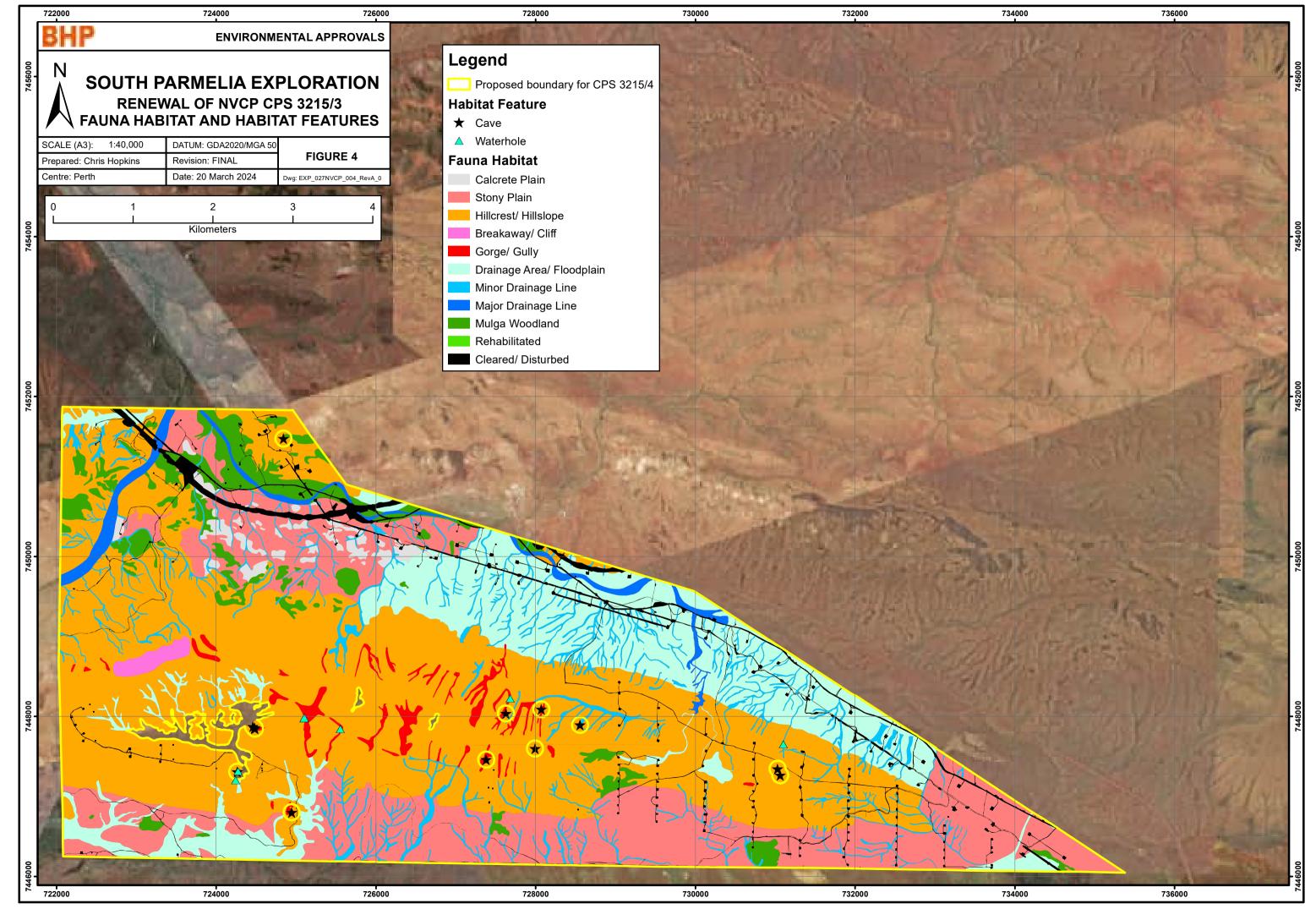


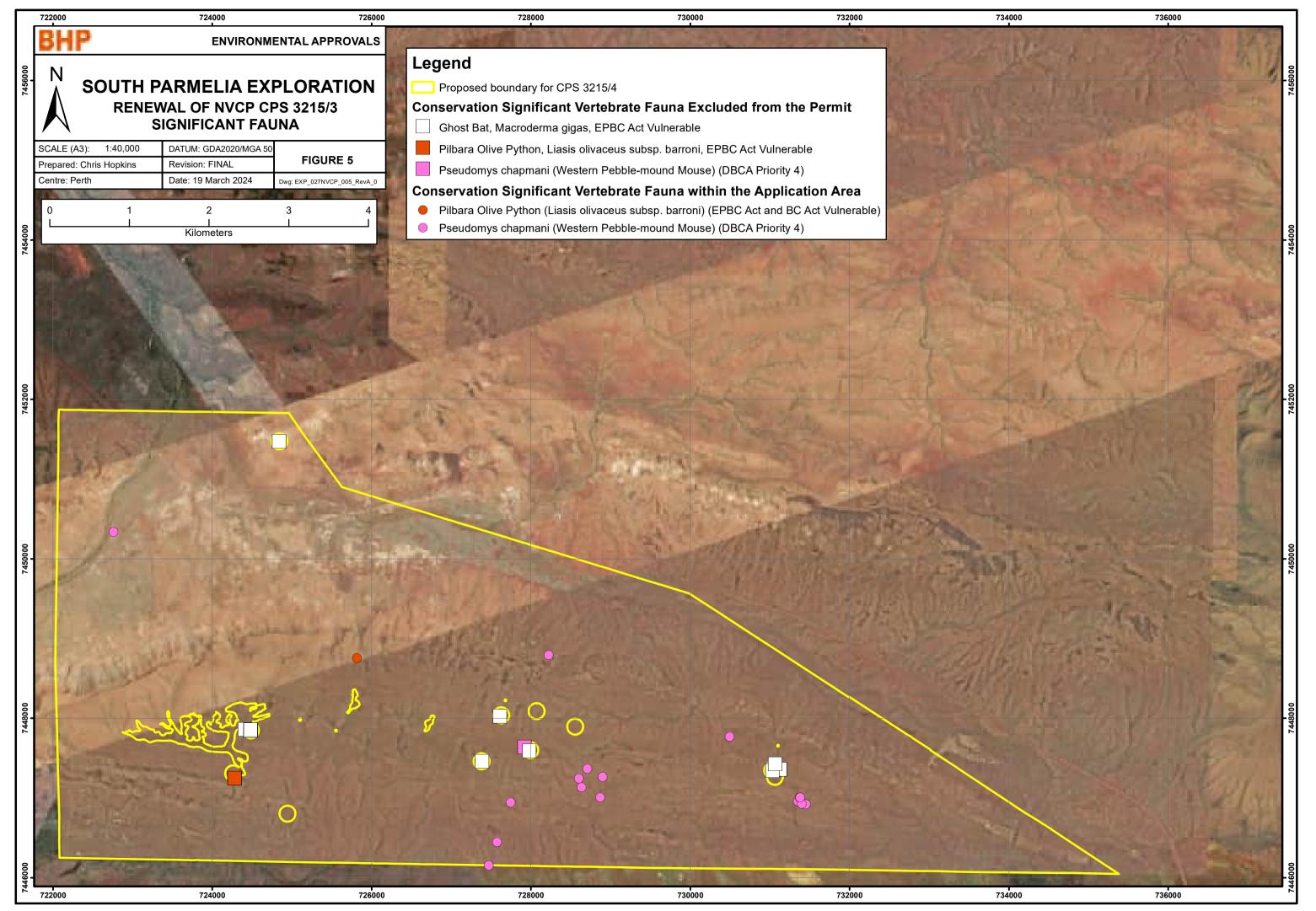
Figures













Appendices



| Appendix 1: | Jinidi Detailed Flora and | d Vegetation 3 | Survey Interim | Report: D | ry-season |
|-------------|---------------------------|-----------------------|----------------|-----------|-----------|
| | (Biologic, 2024a) | | | | |



| Appendix 2: | Consolidation of Regional Vegetation Mapping BHP Billiton Iron Ore |
|-------------|--|
| | Pilbara Tenure (Onshore Environmental, 2014) |



| Appendix 3: Ji | inidi Targeted Ve | rtebrate Fauna | Survev | (Biologic. | 2024b) |
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