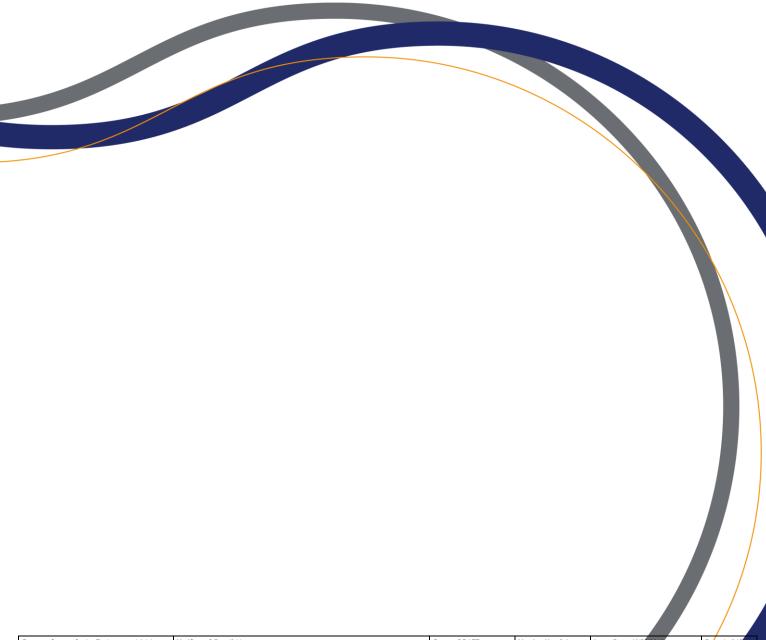


PRO-1730-10 Land Clearing

NOVA OPERATION



Process Owner: Senior Environmental Advisor Verifiers: C Pennifold Status: DRAFT Version No.: 0.1 Issue Date: 15/02/2019 Page 1 of 13



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1. PURPOSE

The purpose of this procedure is to describe the processes for undertaking land clearing activities at the Nova Operation, including approvals and record keeping.

2. SCOPE

In Scope: This document covers the following range of items:

- Land clearing at the Nova Operation
- All stages of:
 - Exploration
 - Construction
 - Operation
 - Rehabilitation; and
 - Closure

Out of Scope: This document does not cover the following range of items:

Land clearing at any other IGO operation or site

This procedure applies to and is intended for the following personnel planning on undertaking land clearing activities:

- IGO employees
- Contractors; and
- Visitors

3. DOCUMENT REVIEW OR CHANGE

This procedure shall be reviewed as a minimum;

- at intervals no greater than every 2 years
- when there is a change in Legislation, Code of Practice, Australian Standard, or other relevant reference
- in the event of an incident to which this procedure was relevant



4. INTRODUCTION

Land clearing refers to all vegetation clearing which may be for exploration (e.g. drilling programs, tracks, pads), construction (e.g. borrow pits, laydown areas, infrastructure (e.g. pipelines, buildings, power lines) access corridors (e.g. haul roads) or other purpose.

Land clearing has the potential to:

- Cause permanent or short-term changes to the landscape
- Reduce the area of plant communities
- Reduce the area of fauna habitats
- Cause wind and water erosion
- Generate dust
- Cause a loss of soil biota in topsoil
- Cause compaction of soil surfaces
- Increase the spread of weeds
- Lead to land contamination
- Increase requirements for rehabilitation

Furthermore, unauthorised land clearing may result in non-compliance with approvals and legislation, which could result in personal and/or company prosecution, fines, and penalties.

Therefore, it is required to tightly control and manage the process for land clearing at the Nova Operation.

4.1 Objectives

The objectives of this procedure are to ensure that:

- Land clearing is conducted in accordance with all legal obligations
- Land clearing is kept to the minimum necessary
- Land clearing is strictly controlled and documented
- Unnecessary impacts to fauna, flora and vegetation is minimised
- The floristic values of the project area are maintained
- Company liabilities and financial costs that result from clearing and rehabilitation are minimised

5. CLEARING APPROVALS

Both external (regulatory) and internal approvals are required before land clearing can commence.

It is the responsibility of the person undertaking the land clearing to ensure that both external and internal approvals are in place before the land clearing commences.

5.1 External Approval

5.1.1 Clearing Permits

Clearing activities in Western Australia are regulated via the *Environmental Protection Act 1986* and the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004*. In accordance with this Act, clearing activities may only be conducted where a Clearing Permit has been granted. Clearing Permits may be obtained from the Department of Mines, Industry Regulation and Safety (DMIRS) as an agreement exists between DMIRS and the Department of Water and Environmental Regulation (DWER) for DMIRS to assess those land clearing applications related to mining activities.

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There are some situations where a Clearing Permit is not required. These include:

- Clearing for exploration purposes if conducted under an approved Programme of Work.
- Activities authorised under an approved Mining Proposal for clearing up to 10 hectares (ha) per tenement per financial year.
- Activities for Licences to Construct or Alter Wells issued under the Rights in Water and Irrigation Act 1914.
- Activities approved under Part IV of the Environmental Protection Act 1986 in a Ministerial Statement.
- Clearing for maintenance in existing cleared areas, providing the land was lawfully cleared within the previous ten years.
- Clearing for vehicle tracks provided, together with all other exempt clearings in the financial year this does not exceed 1 ha.
- Clearing for a temporary bypass road where the existing road is impassable due to unforeseen damage to that section of road.
- Clearing for maintenance in existing transport corridors.

IGO currently holds the following three Clearing Permits for the Nova Operation, granted under section 51E of the *Environmental Protection Act 1986*:

- Purpose Permit CPS 6253/1, duration from 23 January 2015 to 31 January 2020, for clearing of up to 460.0 ha of native vegetation for the purposes of mineral production and associated infrastructure on tenement M28/376.
- Purpose Permit CPS 6357/1, duration from 23 January 2015 to 31 January 2020, for clearing of up to 80.0 ha of native vegetation for the purpose of airstrip and associated infrastructure on tenement L28/51.
- Purpose Permit CPS 6413/1, duration from 11 April 2015 to 11 April 2020, for clearing of up to 584.5 ha of native vegetation for the purpose of the haul road, borrow pits and associated activities on tenement L69/22.



NOTE:

Each of these Clearing Permits contains conditions which must be adhered to

5.1.2 Malleefowl Surveys

Prior to undertaking any clearing authorised under CPS 6253/1 IGO shall engage a fauna specialist to conduct a fauna survey within the areas to be cleared to identify any Malleefowl (*Leipoa ocellata*) mounds or critical habitat. The results of this survey are provided to DMIRS in a Fauna Survey Report (see Section 7.3). Where Malleefowl mounds are identified, then no clearing of the area can occur without permission from DMIRS.

IGO has previously undertaken fauna surveys across much of tenement M28/376. The areas that have been previously surveyed are recorded in spatial layers available from the Environmental Department, with known locations of Malleefowl mounds marked. If clearing is to be undertaken in an area where surveys have not previously been undertaken, then an additional survey will need to be organised, and sufficient time should be allowed for this.

5.1.3 Programme of Works

The *Mining Act 1978* requires that a Programme of Work (PoW) is lodged in the prescribed manner and approved by the Minister (or a prescribed official) prior to an explorer or prospector conducting any ground disturbing activities with mechanised equipment.

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An application for a PoW is submitted to DMIRS online. Once approved a PoW is usually valid for four years. Any alterations or expansion of the approved activity requires a new PoW application to be lodged and approved. It is expected that rehabilitation of all activities under a PoW is completed within six months from the date of the ground disturbing activity occurring.

5.1.4 Mining Proposals

A Mining Proposal shall be submitted for written approval by DMIRS prior to the commencement of mining operations. The Nova Operation already has several approved Mining Proposals but may need to apply for a new Mining Proposal for activities not covered by these. The Mining Proposals contain detailed information on identification, evaluation and management of significant environmental impacts relevant to the proposed activity.

5.2 Internal Approval

Approval shall be applied for by completing the internal form *Land Clearing - Request FRM-1730-1000*. The Land Clearing Request form shall be assessed and approved by the Environmental Department before any land clearing activities can commence. An example of the Land Clearing Request form is attached as 0. Once approved and signed-off by all parties this document will function as an internal Land Clearing Permit. The process for applying for the permit is described below.

The Applicant requesting clearing authorisation will complete Section 1 of the Land Clearing Request form. Information that must be detailed on the form includes:

- The tenement the clearing is to occur on
- An area to be cleared in hectares
- Purpose of clearing
- Method to be used
- GIS coordinates, or spatial layers of the area to be cleared
- A clearing plan and/or map of the proposed clearing area
- Details of any external approvals already obtained (e.g. PoW number)

The Applicant shall ensure designs, footprints and GPS coordinates are based on accurate information and have been approved by all relevant IGO personnel. A cross-check of approved designs shall be obtained to confirm the area of disturbance, buffers, constraints and the most current information/map/dimensions are being used.

The Applicant then gives the Land Clearing Request form to the Environmental Department. It is recommended that the form is submitted at least two weeks prior to the planned commencement date to allow adequate time for assessment.

The Environment Department will assess the form and complete Section 2.

Assessment includes checking:

- the proposed clearing area is within the approved clearing footprint of an External Approval or satisfies exemptions under the Environmental Protection Act.
- the proposed disturbance area for known locations of significant flora and vegetation communities.
- the proposed disturbance area for known significant fauna habitat or species
- the proposed disturbance area for Malleefowl mounds
- the proposed disturbance area for the location heritage sites and culturally significant areas
- if the proposed disturbance will directly impact on watercourses



Assessment also includes:

 Reviewing Mining Proposal commitments and Tenement Conditions for any relevant legal requirements

The Environmental Department will use data from previous surveys, and/or may undertake a visual inspection of the proposed disturbance area as necessary. The Applicant will be informed if further information is required or if there are unexpected delays to the assessment and approval process.

During the assessment, the Environmental Department may place Conditions for Approval in Section 3 of the Land Clearing Request form. These conditions may be generic to the work type, or specific to a particular site.

After an assessment, the Environmental Department will sign Section 4 to indicate approval, and then return the form to the Applicant. The Applicant is responsible for ensuring that all other signatures are obtained for Section 4, including approval from:

- · the IGO Department Manager; and
- Nova General Manager.

The following personnel shall also sign to acknowledge the Conditions of Approval and agree to only undertake the works authorised by the Land Clearing Permit.

- The Applicant
- Project Manager
- Nova Supervisor; and
- Clearing Contractor.



NOTE:

Clearing is not authorised to commence until all parties have signed Section 4.

The final signed hardcopy version of the Land Clearing Request form is given back to the Environmental Department for filing, and the Project Manager keeps a copy.

After the Land Clearing Permit is approved, if the clearing area changes or additional areas are required, then the Applicant shall inform the Environment Department. Either a new Land Clearing Permit will be required, or an update can be made to the existing permit. If any updates occur to an approved Clearing Permit, then a fresh sign off from all personnel is listed in Section 4 of the Land Clearing Request form is required, and all spatial data and maps shall be updated.

6. CLEARING ACTIVITIES

The Project Manager is responsible for ensuring that the approved disturbance area is clearly marked in the field using appropriate GPS equipment and flagging/pegs based on approved mapping data. Infrastructure areas and topsoil stockpile areas shall be clearly delineated. No clearing or stockpiles can occur outside of the area approved under the Land Clearing Permit.

The Project Manager is responsible for discussing best practice clearing methods with the person physically undertaking the work prior to its commencement. The clearing method will be based on approval commitments, internal requirements, and the situation at the specific location to be cleared. It is essential that operators are diligent and follow the Conditions of Approval that are specified in the Land Clearing Permit.

The person who is physically undertaking the work shall follow safety precautions and complete a JSEA before the commencement of the land clearing activity to ensure that all hazards are addressed.

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NOTE:

An Excavation Permit or other Permit to Work may also be required for the job.

Land clearing activities are to be undertaken in accordance with the *Flora Management - Weed and Vehicle Hygiene Management NOV-ENV-FLM-PRO-1730-00* to ensure that the activities do not lead to the spread of environmental weeds.

This includes:

- Ensuring that earthmoving machinery is cleaned prior to undertaking the land clearing
- Limiting the movement of topsoil
- Remaining on existing roads and tracks where possible.

Where track clearing is necessary, raised blade clearing shall be conducted to minimise disturbance and aid rehabilitation efforts. Raised blade clearing involves setting the blade of a bulldozer above ground level and cutting off vegetation at the stem while leaving rootstock and topsoil intact.

A representative from the Environmental Department may inspect the site during or immediately after clearing activities to confirm that all Conditions of Approval as specified in the Land Clearing Permit were adhered to.

6.1 Vegetation Removal

- Vegetation is to be removed separately from soil wherever practicable.
- Vegetation is to be cleared with a raised blade and where possible, branches should be pruned rather than whole trees removed.
- Cleared vegetation shall be placed in stockpiles for later use in rehabilitation activities. Care should be taken to ensure stockpiles do not impede drainage or present a fire hazard for later work to be undertaken in the area.

6.2 Topsoil Stripping and Stockpiles

- Topsoil stripping is to be conducted when soils are not saturated and during periods of low winds.
- Topsoil will be stripped and harvested to a depth of approximately 100mm during clearing activities.
- In areas where significant soil disturbing activities will be undertaken, a further 100 300mm of the subsoil is also to be harvested where practical.
- Topsoil, subsoil, and vegetation are to be stockpiled separately.
- Topsoil and subsoil are to be stockpiled in mounds no more than 2m high to minimise erosion and the deterioration of soil structure, valuable organic matter and seed viability.
- Topsoil is not to be stockpiled where it could be contaminated by spraying of saline water or lost by erosion.
- Stockpiles will be strategically located away from drainage lines, and concentrated surface
 water flows, trafficable areas and areas where contaminating substances are used or stored.
 The topsoil stockpile storage areas documented in the approved Land Clearing Permit shall
 be used.
- Where a drilling sump is to be constructed the substrate soil from digging the sump is to be stockpiled separately for backfilling of the sump at the completion of works.

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6.3 Post-Disturbance Survey

After the clearing activities have been undertaken the Project Manager is responsible for ensuring the area that was cleared is surveyed. This survey shall be completed in a timely manner. GPS or equivalent accuracy equipment shall be used. The actual-clearing survey data shall be provided to the Environmental Department to allow comparison with the approved clearing area and for updating of records.



In the event that unapproved clearing has occurred, this will be reported as an environmental incident and actioned accordingly.

7. REPORTING

7.1 Incident Reporting

If an employee determines that unapproved clearing has occurred, they are responsible for informing their Supervisor as soon as possible. The Supervisor shall inform the Environmental Department and ensure that the event is entered into the INX InControl reporting system as an Environmental Incident.

Unapproved clearing that constitutes an incident may be:

- Land clearing without a Nova internal Land Clearing Permit.
- Land clearing that deviated outside of the area approved by the Nova internal Land Clearing Permit.
- Land clearing outside the approved conditions in the Nova internal Land Clearing Permit.

The incident shall be investigated to determine the environmental impact, cause of the incident, and whether the incident is externally reportable. An investigation shall be undertaken by the relevant Manager, with support from the Environmental Department. Appropriate preventative and corrective actions should be assigned within INX InControl and implemented.

In the event clearing occurred without external regulatory approval or outside of the area authorised by the external approval, then this will be an externally reportable incident. The Environmental Department will report the incident to the appropriate regulators.

7.2 Annual Reports

The Annual Clearing Permit Report covers the financial year and is submitted to DMIRS by 31 July of each year, and describes all clearing activities undertaken under permits 6253/1, 6357/1, and 6413/1.

The Annual Clearing Permit Report shall contain the following information:

- Demonstration of adherence to all conditions of the permits
- The total amount of clearing
- The location where the clearing occurred (in GDA94 geographical coordinates)
- The date the area was cleared
- The size of the area cleared (in hectares)
- The purpose for which clearing was undertaken.

Data on the amount of land that has been disturbed is also included in the Annual Environmental Reports and Mining Rehabilitation Fund Reports that are submitted to DMIRS annually.

The Environmental Department is responsible for preparing the annual reports, ensuring they contain all the required information, and submitting them to the regulators.

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7.3 Fauna Survey Reports

When a fauna survey has been conducted as per Section 5.1.2, then the results of the survey shall be provided in a report to DMIRS.

The Fauna Survey Report must include:

- the location of each Malleefowl mound, recorded using a Global Positioning System (GPS)
 unit set to Geocentric Datum Australia 1994 (GDA94), expressing the geographical
 coordinates in Eastings and Northings or decimal degrees
- the location of the Malleefowl critical habitat, recorded using a GPS unit set to GDA94, expressing the geographical coordinates in Eastings and Northings or decimal degrees
- the methodology used to survey the area, establish the Malleefowl critical habitat, and identify the mounds
- the extent of the Malleefowl critical habitat shown on a map
- a description of the critical habitat found.

The fauna specialist consultant will prepare the fauna survey report, and the Environmental Department will submit the report to DMIRS.

8. TRAINING AND AWARENESS

The Nova Site induction informs employees, contractors and visitors about the requirement to have an approved Land Clearing Permit prior to commencing land clearing. Information is also available to personnel via the online Document Management System (DMS). The Environmental Department shall provide training and awareness materials to key work groups as required to reduce the risk of an unauthorised clearing.

9. RECORDS

During the assessment of each Land Clearing Request form, it is assigned an Internal Land Clearing Permit Number.

All completed Land Clearing Request forms are saved in hardcopy in the Environmental Department office area, and electronically in the folder for the relevant internal Land Clearing Permit. These folders are found at O:\006-Nova Operation\001 Sustainability\003 Environment\Land Clearing Permits. The folder for each permit should also include any maps, spatial files (e.g. layers), photos, or other supporting documentation related to the land clearing request/permit.

It is essential that a record is kept of the location where the clearing occurred in GDA94 geographical coordinates, either in eastings and northings or as decimal degrees.

Details on each Land Clearing Request form are entered into the Nova Internal Clearing Permit Register by the Environmental Department. The register is saved at O:\006-Nova Operation\001 Sustainability\003 Environment\Land Clearing Permits. This spreadsheet is also used by the Environmental Department to track the disturbance occurring on each Tenement for preparation of annual reports.

The Environmental Department retains spatial files containing the areas that have been surveyed for Malleefowl and the locations of all identified Malleefowl mounds.



10. DEFINITIONS AND ABBREVIATIONS

Term	Definition					
Land Clearing	The killing, destruction of, removal of, or substantial damage to some or all of the native vegetation in an area					
DWER	Department of Water and Environmental Regulation					
DMIRS	Department of Mines, Industry Regulation and Safety					
GDA94	Geocentric Datum Australia 1994					
GPS	Global Positioning System					
JSEA	Job Safety and Environmental Analysis – an administrative tool used to help identify the hazards, risks and controls involved in the task being undertaken					
PoW	Programme of Work					

11. ACCOUNTABILITIES

Role	Responsibility					
General Manager	 Ensure adequate processes are established to communicate relevant information with internal and external stakeholders. Ensure adequate resources are provided to meet the requirements of this procedure. Ensure compliance is maintained with the requirements of this procedure. Review and approve all Land Clearing Permits 					
Environmental Advisors	 Ensure adequate processes are established to communicate relevant information with internal and external stakeholders. Ensure adequate resources are provided to meet the requirements of this procedure. Ensure compliance is maintained with the requirements of this procedure. Review and approve all Land Clearing Permits 					
Project Manager	 Ensure adequate processes are maintained to communicate relevant information with internal stakeholders. Ensure adequate resources are provided to meet the requirements of this procedure. Ensure compliance with the requirements of this procedure is maintained within the department. 					
Managers, Superintendents and Seniors	 Ensure adequate processes are established to communicate relevant information with internal stakeholders. Ensure adequate resources are provided to meet the departments' requirements of this procedure. Ensure compliance with the requirements of this procedure is maintained within the department. 					
Area Supervisors	 Ensure adequate processes are maintained to communicate relevant information with internal stakeholders. Ensure adequate resources are provided to meet the requirements of this procedure. Ensure compliance with the requirements of this procedure is maintained within the department. 					
IGO Personnel, Contractors, Sub-contractors and Visitors	Ensure compliance with the requirements of this procedure.					



12. REFERENCES AND RELATED DOCUMENTATION

Legislation and Regulations							
	Mining Act 1978						
ACTS	Rights in Water and Irrigation Act 1914.						
	Environmental Protection Act 1986						
Regulations	Environmental Protection (Clearing of Native Vegetation) Regulations, 2004						
Other Legal Obligation	Other Legal Obligations						
Internal	Nova Project Stage 1 Mining Proposal M28/376 (REG ID 52685)						
internal	• CPS 6253/1, CPS 6357/1, and CPS 6413/1						
Standards, Codes of P	Standards, Codes of Practice and Industry Guidelines						
Internal • IGO Group Environment Standard 5: Land Use & Biodiversity Management							
External	 A Guide to the Exemptions and Regulations for Clearing Native Vegetation (Government of Western Australia 2014) 						
Referenced and Relate	ed Documentation						
	Land Clearing - Request FRM-1730-1000						
	Permit to Work NOVA-SWP-OHS-017						
Internal	Flora Management - Weed and Vehicle Hygiene Management NOV-ENV-FLM-PRO-1730-00						
	Fauna Management PRO-1735-10						



APPENDIX 1 - LAND CLEARING - REQUEST FORM

igo		Land Clearing -	- Reque	est		FRI	и-1730-1000	lgo		Land Clearing - Request	FRM-1	1730-1000
UNDER NO CIRCUMSTANCES SHALL ANY CLEARING OF VEGETATION TAKE PLACE WITHOUT CONSENT FROM SECTION 3: CONDITIONS OF APPROVAL (ENVIRONMENTAL DEPARTMENT TO COMPLETE)			
REGULATORY AUTHORITIES AND WITHOUT APPROVAL BY THIS FULLY COMPLETED AND SI THE FINAL REQUEST FORM AND SUPPORTING DOCUMENTATION SHALL BE KEPT WITH THE ENVIRONME							ITE	CONDITION		APPLI YES	CABLE	
					BE REI I WIIII IIIE ERVI	TOWNERT AC DET ANT	men.	1 1	Earthmoving machine cleared.	ery is to be cleaned of soil and vegetative matter prior to entering the area to be		
		ECIFIED ON THIS REQUES OVED TO BE PERFORMED		KIWI	Permit No.			2		es and other vehicles to be restricted to the limits of the areas to be cleared.		
SECT	TON 1: APPLICA	ATION DETAILS (APPLICA	NT TO	O CON	MPLETE)			3		psoil is to be stripped and stockpiled at a maximum height of 2m at a location near sted, away from drainage lines, and away from tracks.		
Reque	sted by				Date	/	1	4		eared with a raised blade and stockpiled separately for use in rehabilitation.		
Depart	tment				Tenement			5		gging the sump is to be stockpiled separately for back filling of the sump at		
Contra	ector				Area (ha)			8	completion of works.	e rehabilitated within 6 months of completion of drilling.		
Reaso	n							7	Facure that are larger	elearing occurs within 50m of the significant fauna habitat or heritage site that is at		
Descri	ption								the following coordinational Conditions of App			
Metho	d							7100		and the same of th		
ITEM	REQUIREMENTS					YES	NO		_			
1	Are the GIS coordina	tes attached?										
2	Are spatial files attack	hed?										
3	Is a detailed Clearing	Plan attached?										
4	Is a Map attached?							SE/	CTION 4: ADDROV	/AL AND ACCEPTANCE (ALL PARTIES)		
5	Is an Excavation Pen	mit required?								MENCE UNTIL ALL PARTIES HAVE SIGNED THE BELOW SECTION		
_	If yes, reference:						_	/ apy	prove the land clearing act	ivities as described in this Land Clearing Request form, provided that all Conditions	of Approval	are
6	Is this part of a Progr	amme of Works (PoW)?						adh	ered to.	Name Signature	Date	
	If Yes, reference:						_	Env	ironmental Department	Name Signature	Date	
7	Is this part of a Mining	g Proposal?										_
If Yes, reference:					IGO	Department Manager		/ /	1			
Planned Commencement Date: Planned Completion Date:			/	/	Nov	a General Manager		/ /	/			
SECT	ION 2: SITE AS	SESSMENT DETAILS (ENV	VIDON	IMEN	TAL DEDARTMEN	T TO COMPLET	Ε\	l aci		to the Conditions of Approval, and I will only undertake land clearing as authorised	by this Land	l Clearing
ITEM	REQUIREMENT	SESSMENT DETAILS (EN	YES		DETAILS/COMMEN		L.)		Title	Name Signature	Date	
1	Has DMIRS granted	approval through a PoW, MP or			DETTUE OF O SIMILIFE			App	licant		/ /	/
2	Is this clearing exempt from the requirements of the							Proj	ect Manager		/	/
_	Vegetation) Regulati	ons 2004?	_					Nov	a Supervisor		/	
3	specialist?	rvey been conducted by a fauna						Clea	ring Contractor		/	
4	Could the clearing in watercourses?	npact on drainage lines or							-			
5	vegetation communit	Could the clearing impact on significent flore or vegetation communities?							CTION 5: FINAL S SPONSIBLE PERSON		COMP	LETED
6	Could the clearing impact on significant fauna habitat or species?									TASK Final signed version of this form provided to the Environmental Department.	YES	NO
7	Could the election impost on bestern sites as								licant	Copy to be kept by the Project Manager. Nova Internal Land Clearing Permit Register updated, and relevant spatial data	ata 0 0	
8	Vegetation Type: Soil T			Soil Type:	il Type:			ronmental Department layers reviewed and updated. Completed a post-disturbance survey to verify the area that was actually				
9	9 Plant Species Present:			· · · · · · · · · · · · · · · · · · ·			Proj	ect Manager	disturbed. Provide survey data to the Environmental Department.			
Process Owner: Sentor Shutormental Ashor Verifienc C Pennithor Werifienc C												