

29/05/2023

Native Vegetation Clearing Branch - DMIRS
Mineral House
100 Plain Street, East Perth
WA 6004

By Email: nvab@dmirs.wa.gov.au

Dear Sir/Madam,

RE: APPLICATION TO EXTEND PURPOSE PERMIT CPS8087/2 AND AMEND CONDITIONS 9/10 SUPPORTING INFORMATION

Big Bell Gold Operations Pty Ltd (BBGO) currently holds CPS8087/2 which is due to expire on 7 September 2023. BBGO seeks to extend the duration of the permit for another five years and remove conditions 9 and 10 based on the information and assessment of surveys provided below.

CPS8087/2 Permit Extension Application

Native Vegetation Clearing Permit (NVCP) CPS 8087/2 permits clearing of 319 hectares (ha) of native vegetation across the purpose permit envelope (PPE) between 8 September 2018 and 7 September 2023. 72.13 ha was cleared in the 2021/2022 reporting period with an allocation of 150.39 ha remaining overall. A total of 168.61 ha clearing allocation has been utilised between 8 September 2018 to present.

The permit requires extension to allow native vegetation clearing for future mining activity development, exploration activities and flexibility in making modification to new and existing operational supporting infrastructure. The additional clearing will not exceed the remaining allocation of 150.39 ha under permit CPS 8087/2. This permit underpins Big Bell Gold Operations Pty Ltd (BBGO) approval and compliance programs at the Big Bell, Cuddingwarra and Day Dawn.

Considering CPS 8087/2 is a 'purpose permit', BBGO is seeking a five-year extension.

Removal of Conditions 9 and 10 of CPS8087/2 Permit

BBGO is requesting the removal of conditions 9 and 10 during this renewal process. Conditions 9 and 10 specify inspection and clearing avoidance requirements for 'Fauna Management' relating to the Malleefowl (*Leipoa ocellata*) [and mounds] and Western Spiny-tailed Skink (*Egernia stokesii badia*) respectively. BBGO consider the risk of encountering Malleefowl or Western Spiny-tailed Skink habitation or breeding areas (mounds) as extremely low across the PPE.

NVCP8087/2 Annual Environmental Report for 2021/2022 is provided as Attachment A. This report provides evidence of compliance with conditions of CPS8087/2 and specifies that internal targeted searches of Malleefowl (*Leipoa ocellata*) [and mounds] and Western Spiny-tailed Skink (*Egernia stokesii badia*) that BBGO 'fauna specialists' were unable to locate evidence of their habitation.

To support this request, four technical reports are attached as Attachments B1, B2, B3 and B4. A summary of each report is provided below. Additionally, three figures (Figures 1, 2 and 3) are provided that show relevant technical study areas, associated fauna habitats, internally surveyed areas (conducted via the internal disturbance permitting system) and all historically identified conservation significant species associated with the PPE.

A secondary sign (unknown trace) of a *Leipoa ocellata* was identified in a historical written context as depicted in Figure 3. The secondary sign was located northwest of the Day Dawn Project PPE. BBGO have been unable to verify the dates of this record. Field validation undertaken on the 29th May 2023 confirmed the secondary sign (no evidence of a mound or fauna activity) is no longer present. Furthermore, Recent technical surveys have not found any further evidence of Malleefowls in the region or PPE.

MWH (2015) Targeted Search for Malleefowl Mounds and Western Spiny-tailed Skinks Habitat Summary

MWH (2015) conducted a targeted survey for Malleefowl mounds and Western Spiny-tailed Skink habitats over sections of the Day Dawn Project at the Great Fingall, South Fingall and Yellow Taxi mine areas (Attachment B1). MWH concluded that no evidence of either species were recorded over the study areas and habitat of suitable size and quality is not present.

Outback Ecology (2012) Central Murchison Gold Project. Level 1 Vegetation, Flora and Fauna Assessment Summary

Outback Ecology (2012) conducted an extensive survey across all sites (Big Bell, Cuddingwarra and Day Dawn) within the PPE (Attachment B2). This survey compared the fauna habitat, database/literature records and on-the-ground surveys to provide a combined assessment on the likelihood of Malleefowl and Western Spiny-tailed Skink being present in the PPE.

Outback Ecology (2012) concluded that whilst database/literature reviews had identified both the targeted species could theoretically occur in the region, it is unlikely due to the lack of suitable habitat. Outback Ecology (2012) also concluded:

“Fauna habitat assessments of the Study area showed that much of the habitat perceived as potentially suitable for conservation significant species was degraded (e.g. by grazing) and therefore unlikely to support these species. Further, targeted searches for conservation significant species within potentially suitable habitats failed to record any evidence of their presence.”

In summary, Outback Ecology (2012) identified no evidence of Malleefowl and Western Spiny-tailed Skink or suitable habitat for these species in the PPE.

Western Ecological (2021a) Reconnaissance Flora and Vegetation Survey and Basic Terrestrial Fauna Survey Summary

Western Ecological (2021a) conducted a survey of the Accelerator/Indicator mine areas (Attachment B3). This location is located to the north of Big Bell under CPS9228/1 (Accelerator Indicator). Whilst it is not within the extent of CPS8087/2, this survey indicates that there is no suitable habitat for Malleefowl in this region.

Western Ecological (2021a) concluded:

“During the Malleefowl assessment, no suitable habitat was recorded and no Malleefowl, mounds or tracks were recorded. In addition, a lack of database records results in the Malleefowl being considered unlikely to occur in the survey area.”

Western Ecological (2021a) also concluded:

“A total of 33 fauna species, from 23 families were recorded during the field survey. No species of conservation significance were recorded during the field survey and all fauna species recorded are considered relatively common and widespread.”

In summary, no conservation significant species (including Malleefowl and Western Spiny-tailed Skink) were identified during the survey.

Western Ecological (2021b) Basic Terrestrial Fauna Survey Summary

Western Ecological (2021b) conducted a survey of the Tuckabianna mine areas (Attachment B4). This is located to the east of the CPS 8087/2 and covers approved CPS 9435/1. Whilst it is not within the extent of CPS8087/2, this survey indicated that there is no suitable habitat for Malleefowl in this region.

Western Ecological (2021b) concluded:

“During the Malleefowl assessment, no suitable habitat was recorded and no Malleefowl, mounds or tracks were recorded. In addition, a lack of database records results in the Malleefowl being considered Unlikely to occur in the survey area.”

Western Ecological (2021b) also concluded:

“During the survey a total of 37 fauna species, from 25 families were recorded. No species of conservation significance were recorded during the field survey and all fauna species recorded are considered relatively common and widespread in the region.”

In summary, no conservation significant species (including Malleefowl and Western Spiny-tailed Skink) were identified during the survey.

Westgold Resources Pty Ltd Internal Pre-Disturbance Surveys

To ensure land disturbance by BBGO is completed in a comprehensive and responsible manner, a system known as the Land Use Certificate (LUC) has been implemented. This system compares nationally available conservation fauna data, surveyed fauna data and approvals to systematically review and permit internal land disturbance.

Figures 1, 2 and 3 below compares the results from all the combined fauna, fauna habitat, national database, and internal LUC surveys to visualise the extent and high level of confidence that Malleefowl and Western Spiny-tailed Skink are not currently present in the NVCP 8087/2 envelope and are extremely unlikely to be present in the future.

Conclusion

Based on data compiled over ten years of fauna surveys completed by external consultants and internal ‘fauna specialists’, it is reasonable to conclude that the presence of the Malleefowl and Western Spiny-tailed Skink is very unlikely within the CPS 8087/2 PPE. This, along with historic and ongoing pastoral

activity and associated habitat degradation indicates the likelihood of Malleefowl and Western Spiny-tailed Skink in the region as extremely low.

Yours sincerely,

Dean Caporn
Environmental Manager – Cue Gold Operations
Big Bell Gold Operations Pty Ltd

ATTACHMENTS

Attachment	Title
A	CPS8087/2 2022 Annual Environmental Report
B1	<i>MWH (2015). Targeted Search for Malleefowl Mounds and Western Spiny-tailed Skinks Habitat associated with Clearing Permit 5202/3. [currently CPS8087/2]</i>
B2	<i>Outback Ecology (2012). Westgold Resources Limited: Central Murchison Gold Project. Level 1 Vegetation, Flora and Fauna Assessment.</i>
B3	<i>Western Ecological (2021a). Accelerator and Indicator Mining Areas. Reconnaissance Flora and Vegetation Survey and Basic Terrestrial Fauna Survey.</i>
B4	<i>Western Ecological (2021b). Tuckabianna Gold Project. Basic Terrestrial Fauna Survey Report.</i>
C	2023 Authority to act Big Bell Gold Operations



Figure 1: Big Bell Domain – Conservation Significant Fauna, Internal and External Surveys



Figure 2: Cuddingwarra Domain – Conservation Significant Fauna, Internal and External Surveys

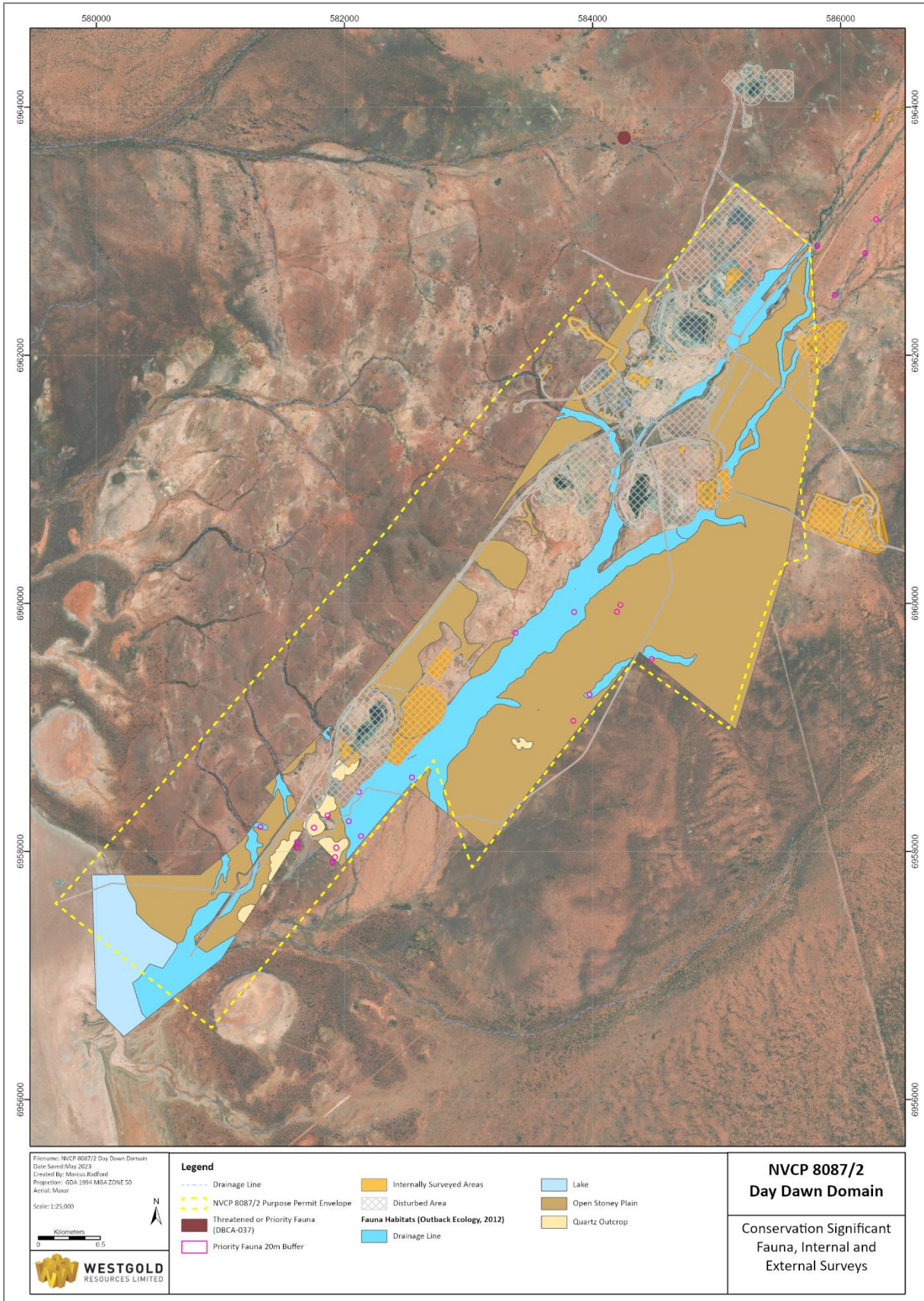


Figure 3: Day Dawn Domain – Conservation Significant Fauna, Internal and External Surveys