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24 March 2022

Department of Mines, Industry Regulation and Safety
Locked Bag 100
EAST PERTH WA 6982

Via: DMIRS Online Payment and Application Lodgement Portal

Attention: DMIRS Resource and Environmental Compliance Division

To whom it may concern,

Re: Request to Amend Native Vegetation Clearing Permit 8358/1

Australian Garnet Pty Ltd (Australian Garnet) writes to request an amendment to Native Vegetation Clearing Permit (NVCP) CPS 8358/1. This document provides information related to the amendment, background, existing environment and assessment against the ten clearing principles.

1. PROPOSED AMENDMENT

A Native Vegetation Clearing Permit was submitted for the Lucky Bay Garnet Windfarm Project (the Project) to allow 1.4 ha of native vegetation clearing on mining tenement L70/178 and was granted on 23 May 2019 (CPS 8358-1).

The purpose of this NVCP amendment is to extend the Purpose Permit Area from 1.4 ha to 5.24 ha (an increase of 3.84 ha) on mining tenement L70/178 and general purpose lease G70/253 to allow sufficient area for wind turbine construction pads and access roads widening. Table 1 provides a detailed breakdown of the clearing amendment. Figure 1 shows the current approved and amended Purpose Permit Area (subject to approval).

Table 1: Land Clearing Amendment

Purpose	Clearing Area (ha)
Turbine Pad Amended Area	1.05
Access Roads Amended Area	2.79
Total	3.84
Current Approved (8358/1)	1.4
New Total (approved plus amendment)	**5.24**

An assessment against the ten clearing principles (see Section 4) as per Schedule 5 of the *Environmental Protection Act 1986* (EP Act) was undertaken based on information collected from site specific flora and vegetation and fauna surveys of the Project Area. This assessment of the proposed clearing against the ten clearing principles determined that the proposed additional clearing (3.84 ha) will not be at variance or is unlikely to be at variance with the ten

clearing principles. Appropriate environmental management controls will be implemented as per the original application to ensure potential impacts associated with the clearing are avoided or minimised where practicable.

2. BACKGROUND

The Lucky Bay Garnet Project (inclusive of the Lucky Bay Garnet Windfarm Project) is located in the Shire of Northampton in the Midwest Region of Western Australia, approximately 35 km south of Kalbarri (Figure 2). Seven 600 KW Enercon E40 wind turbines with 21 m long blades are proposed to be installed on top of 76 m tall towers within tenement L70/178 to supplement power needs for the Lucky Bay Garnet Mine Project. This will significantly reduce diesel consumption and greenhouse gas emissions and provide a long-term renewable power supply for the site and potentially other local enterprises. The windfarm will be retained post life of mine and operated by Australian Garnet to sell power to the local grid.

To date, approximately 0.3 ha of clearing within the Purpose Permit Area has been conducted to date. Records are included in Appendix 7.

2.1 TENURE

The Lucky Bay Garnet Project was acquired by Australian Garnet Pty Ltd in February 2021 from Garnet Resources Pty Ltd, who had previously acquired the Project in February 2014 from the previous owners and parent company Altura Mining Limited. Australian Garnet is a wholly owned subsidiary of Resource Development Group Ltd (RDG, ABN 33 149 028 142) listed on the Australian Securities Exchange (ASX) under the symbol RDG.

A summary of the tenement applicable to this Clearing Permit amendment (Lucky Bay Garnet Windfarm Project) is provided in Table 2. Evidence of ownership is provided in Appendix 1.

Table 2: Lucky Bay Garnet Windfarm Tenements

Tenement	Tenement Holder	Area (ha)	Grant Date	Expiry Date
L70/178	Australian Garnet Pty Ltd	42.00	04/02/2016	03/02/2037
G70/253	Australian Garnet Pty Ltd	9.98	12/11/2014	11/11/2035

222,000 222,300 222,600

6,896,400 6,896,100 6,895,800 6,895,500

N

L 70/170

G 70/253

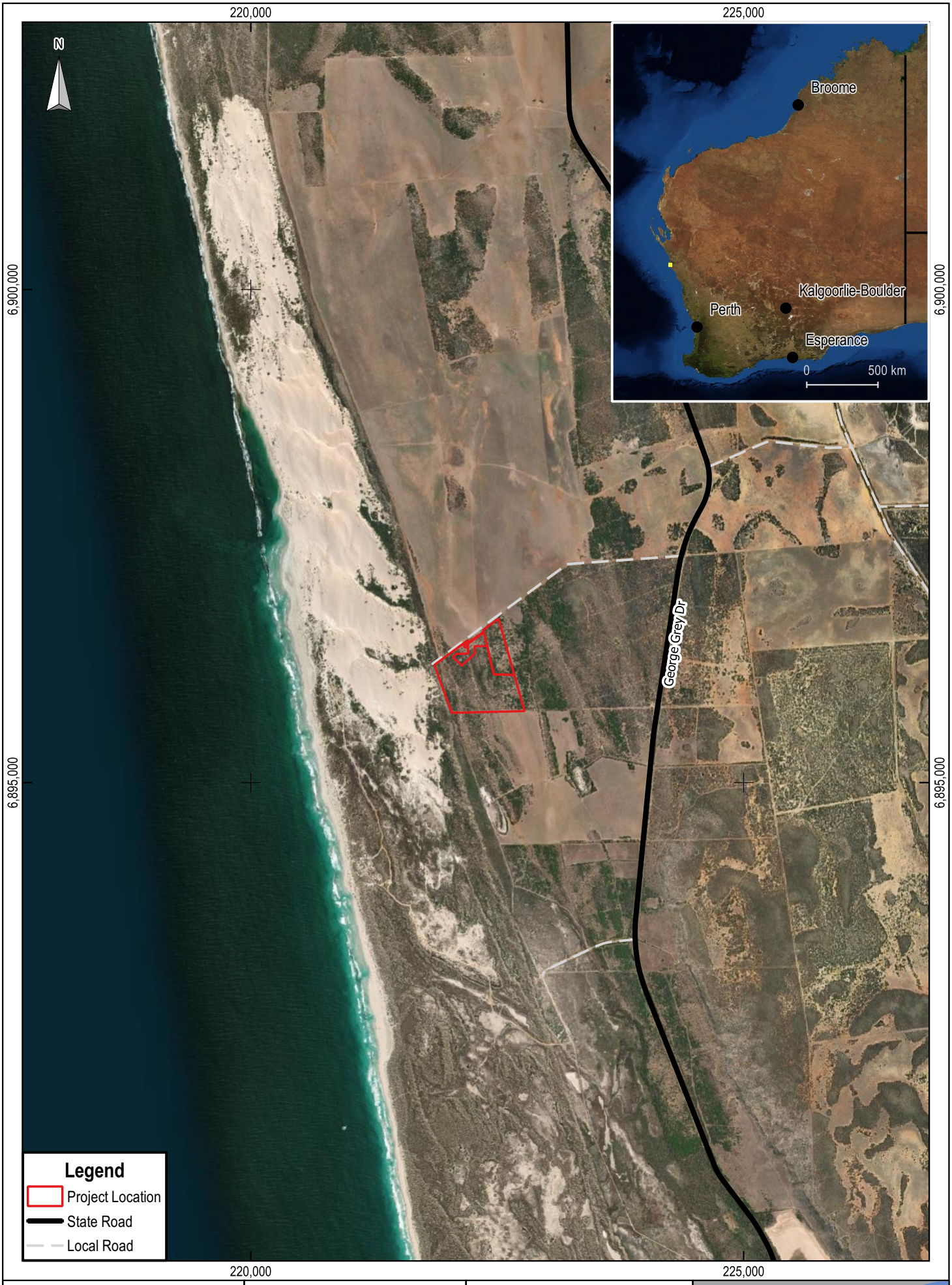
L 70/178

Legend

- Amended Clearing Boundary
- Current Approved Boundary
- Project Tenements

Scale: 1: 3,500 Original Size: A3 Grid: GDA94 / MGA zone 50 (EPSG:28350) 0 75 150 m	Australian Garnet Pty Ltd Lucky Bay Garnet Windfarm Project	**Figure 1** **Current Approved and Amended Boundary**	Martinick Bosch Sell Pty Ltd 4 Cook St West Perth WA 6005 Australia t: +61 8 9226 3166 info@mbsenvironmental.com.au www.mbsenvironmental.com.au

W:\Australian Garnet\Approvals 2021\02 Environmental Approvals\NVCP\CPS 8358\8358 Amendment 2022\3) Refs\GIS\Lucky Bay Windfarm NVCP.qgz 21/03/2022 F1 Approved and Amended Boundary



Scale: 1:50000
Original Size: A4
Image: Copernicus Sentinel Data 2020
Grid: GDA94 / MGA zone 50

Australian Garnet Pty Ltd
Lucky Bay Garnet Windfarm Project

Figure 2

Location Plan

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21/03/2022

3. EXISTING ENVIRONMENT

At the time of the original Purpose Permit application the environmental baseline surveys and information cited was from a Level 1 flora and fauna survey undertaken in September 2008 by Ecoscape Environmental Services (Ecoscape, 2009 - Appendix 2), a Level 2 Flora and Vegetation Survey conducted by Onshore Environmental in 2013 (Onshore 2013 - Appendix 3) and a Level 1 Fauna and Habitat assessment conducted by Bamford Consulting Ecologists in 2013 (Bamford 2013 - Appendix 5).

Since those surveys, additional surveys have been conducted by Onshore Environmental (2022) over the greater Lucky Bay Project Area and serve as the most recent survey data. These surveys also sought to ground truth previous survey efforts. The information contained in the following sections therefore considers all surveys conducted to date. The surveys conducted by Onshore Environmental are as follows:

- Level 2 Detailed Flora and Vegetation Survey (Onshore Environmental, 2022a - Appendix 4).
- Level 2 Detailed and Targeted Terrestrial Vertebrate Fauna Survey (Onshore Environmental, 2022b - Appendix 6).

3.1 FLORA AND VEGETATION

3.1.1 Regional Ecological Systems

The Project Area occurs within the Irwin Botanical District of the Northern Sandplains Region within the Southwest Province. Vegetation was broadly mapped as *Acacia-Casuarina* Thickets and Scrub and mapped more specifically as two units; Low Forest of *Acacia rostellifera* (Greenough 371) and *Acacia rostellifera* Thicket (Greenough 17) on dunes. The remaining pre-European extent for each of the two vegetation associations approximates 10% Greenough 371 and 84% Greenough 17, with less than ten percent of each association currently protected within conservation reserves. Greenough 17 covers the majority of the Project Area with only small portions of the northeast and southeast distributed within Greenough 371 (Onshore, 2022a).

Beard (1990) mapped the vegetation in the Project Area as being Shrublands; *Acacia rostellifera* thicket. The coastal region between Kalbarri and Geraldton has been extensively cleared for agricultural purposes. Much of the vegetation remaining in the region is comprised of fragmented remnants of the pre-European extent (Onshore, 2022a).

3.1.2 Conservation Significant Flora

3.1.2.1 Threatened Flora listed under the Biodiversity Conservation Act 2016 and Environment Protection and Biodiversity Conservation Act 1999

No Threatened flora pursuant to the *Biodiversity Conservation Act 2016 (*BC Act*)* or *Environment Protection and Biodiversity Conservation Act 1999 (*EPBC Act*)* were recorded within the Project Area by any survey (Ecoscape 2009, Onshore 2013 & Onshore 2022).

3.1.2.2 Significant Flora

None of the six priority flora species listed in the (then) Department of Environment and Conservation (DEC) database search as potentially occurring in the 2008 survey area were recorded during the field survey by Ecoscape (2009).

Four Priority taxa were recorded within the flora survey area by Onshore Environmental (Onshore, 2013); *Melaleuca huttensis* (Priority 1)*, Cryptandra glabriflora* (Priority 2), *Anthocercis intricata* (Priority 3) and *Beyeria cinerea* subsp. *cinerea* (Priority 3).

The Onshore report (2022a) revisited the 2013 Priority flora survey findings and detailed examination was undertaken of multiple *Beyeria cinerea* specimens collected from within the Onshore 2013 and 2021 study areas.

All specimens from the 2021 survey were identified as *Beyeria cinerea* subsp. *borealis*. This subspecies is not listed as a Priority flora taxon by the Department of Biodiversity, Conservation and Attractions (DBCA). The specimens recorded from the study area generally have cordate bases and recurved leaves which are more consistent with *Beyeria cinerea* subsp. *borealis.*

Cryptandra glabriflora (Priority 2) was not recorded within the 2021 survey area. The location of previous collections made during the 2013 survey were revisited and confirmed to be *Cryptandra mutila*. It is likely that *Cryptandra mutila* was misidentified as *Cryptandra glabriflora* during the 2013 survey. Seasonal conditions at the time of the Onshore 2013 flora and vegetation survey were rated as poor, with the October survey timing considered relatively late in Spring for the latitude and following a period of below average rainfall. The poor seasonal conditions reduced the quality of flowering and fruiting material and contributed to the misidentification of the above plant taxa.

Six Priority taxa were recorded within the flora survey area by Onshore (2022a); *Anthocercis intricata* (Priority 3), *Bossiaea calcicola* (Priority 3), *Melaleuca huttensis* (Priority 3), *Ptilotus alexandri* (Priority 2), *Stenanthemum divaricatum* (Priority 3) and *Frankenia confusa* (Priority 4).

Of the six priority taxa recorded, three priority taxon (*Anthocercis intricata*, *Frankenia confusa and Melaleuca huttensis)* were identified within the Lucky Bay Garnet Mine Project Disturbance Envelope however none of these are located within the Lucky Bay Garnet Windfarm Project Purpose Permit Area and will not be impacted by the Project.

3.1.2.3 Vegetation Communities

The 2008 survey conducted by Ecoscape Environmental Services (Ecoscape,2009) identified and delineated six relatively distinct vegetation types using a combination of aerial photography and ground-truthing during the field assessment.

The 2013 survey conducted by Onshore Environmental (Onshore, 2013) identified 19 vegetation communities. The vegetation associations were classified into sixteen Broad Floristic Formations on the basis of canopy structure.

The 2021 survey conducted by Onshore Environmental (Onshore, 2022a) identified a total of 26 vegetation communities, classified as 21 Broad Floristic Formations and occurring on five landform features. The vegetation of the survey area consisted predominantly of undulating low sand dunes and hills supporting shrublands of *Acacia rostellifera*. Lower in the landscape there were claypans and flats supporting localised areas of *Casurina obesa* and *Tecticornia inidica* subsp. *bidens*. Further inland the hillcrests and upper hillslopes supported heaths of *Melaleuca cardiophylla*. Large parts of the survey area have been cleared for grazing. Uncontrolled grazing by domestic stock has occurred throughout remnant vegetation across the survey area, reducing species diversity and increasing weed loading.

Vegetation communities located within the greater Lucky Bay Garnet Project Area (including windfarm) are outlined in Table 3 and Figure 3. *Acacia* Shrubland (6a - good condition and 6b - degraded) exists predominantly within the Lucky Bay Garnet Windfarm Project Permit Area (Figure 3).

Table 3: Vegetation Communities of the Greater Lucky Bay Mine Project Area

Code	Broad Floristic Formation	Description	Condition
2	Eucalyptus Low Woodland	Low Woodland of *Eucalyptus camaldulensis, Eucalyptus sargentii* and *Casuarina obesa* over High Open Shrubland of *Acacia rostellifera, Melaleuca viminea* subsp. *viminea* and *Acacia saligna* subsp. *saligna* over Scattered Low Shrubs of *Atriplex amnicola*	Degraded
4	Eucalyptus Mallee	Low Woodland of *Casuarina obesa* over Low Open Shrubland of *Sarcocornia blackiana, Frankenia pauciflora* and *Dissocarpos paradoxus*	Very Good
5	Acacia Closed Scrub	Closed Scrub of *Acacia rostellifera* over Very Open Annual Tussock Grassland of **Ehrharta longiflora* over Scattered Herbs of **Sonchus oleraceus and *Brassica tournefortii*	Very Good
6a	Acacia High Shrubland	High Shrubland to Open Scrub *Acacia rostellifera* over Open Annual Tussock Grassland of **Avena barbata*, **Bromus rubens and *Ehrharta longiflora* with Open Shrubland of *Rhagodia latifolia* var. *latifolia, Pimelea microcephala* and *Olearia sp. indet.*	Good
6b	Acacia High Shrubland	High Shrubland of *Acacia rostellifera* and *Alyogyne hakeifolia* over Open Annual Tussock Grassland of **Avena barbata*, and **Bromus rubens* over Open Herbland of **Brassica tournefortii* and **Medicago truncata*	Degraded
6c	Acacia High Shrubland	High Shrubland of *Acacia rostellifera* over Open Shrubland of *Rhagodia latifolia* var. *latifolia*, *and Scaevola crassifolia* over Very Open Hummock Grassland of *Spinifex longifolius*	Excellent
6d	Acacia High Shrubland	High Shrubland of *Acacia rostellifera* over Shrubland *Olearia* sp. *indet., Pimelea microcephala* and *Zygophyllum fruticulosum* over Low Shrubland of *Acanthocarpus preissii, Pimelea sessilis* and *Solanum oldfieldii*	Very Good
7	Melaleuca High Shrubland	High Shrubland of *Melaleuca cardiophylla* over Shrubland of *Diplolaena grandiflora, Rhagodia latifolia* var. *latifolia* and *Pimelea microcephala* over Very Open Herbs of **Brassica tournefortii*	Good
9	Melaleuca Open Heath	Open Heath of *Melaleuca cardiophylla* and *Olearia* sp. *indet.* over Low Shrubland of *Comesperma scoparium, Scholtzia* sp. Kalbarri (N. Hoyle 623), and *Acanthocarpus preissii* over Very Open Herbland of **Medicago truncata*, **Brassica tournefortii* and **Lysimachia avensis*	Very Good
12	Rhagodia Shrubland	Shrubland of *Rhagodia latifolia* var. *latifolia*, *Pimelea microcephala* and *Olearia sp. indet*. with High Open Shrubland of *Grevillea argyrophylla*, *Acacia rostellifera* and *Santalum spicatum* over Low Open Shrubland of *Melaleuca cardiophylla*, *Scholtzia* sp. *Kalbarri* (N. Hoyle 623) and *Diplopeltis petiolaris*	Very Good
13	Melaleuca Low Closed Heath	Low Closed Heath of *Melaleuca cardiophylla, Melaleuca campanae* and *Cryptandra arbutiflora* over Very Open Herbs of **Brassica tournefortii* and **Lysimachia arvensis*	Very Good
14	Scholtzia Low Open Heath	Low Open Heath of *Scholtzia* sp. Kalbarri (N. Hoyle 623), *Comesperma scoparium* and *Acanthocarpos preissii* with Open Shrubland of *Olearia sp. indet., Acacia rostellifera* and *Pimelea microcephala* over Scattered Tussock Grass of *Austrostipa crinita*	Very Good
HS Ar OKR	Acacia Scrub	Scrub of *Acacia rostellifera* over Low Scrub B of *Olearia* cf. sp. *Kennedy Range* (G. Byrne 66), Pimelea microcephala and *Rhagodia preissii* subsp. *obovata* over Very Open Herbs of **Brassica tournefortii, Calandrinia polyandra* and **Urospermum picroides* on orange/brown sand on hillslopes	Degraded - Very Good

Code	Broad Floristic Formation	Description	Condition
HS BdAb	*Bromus Open Low Grass	Open Low Grass of **Bromus diandrus* and **Avena barbata* over Open Herbs of **Brassica tournefortii*, **Medicago littoralis* and **Urospermum picroides* with Open Scrub of *Acacia rostellifera* on orange/brown sand on hillslopes	Completely Degraded - Degraded

None of the vegetation associations from the survey areas (Ecoscape 2009, Onshore 2013, 2022a) were affiliated with any Commonwealth-listed Threatened Ecological Communities (TEC).

Both the 2013 and 2021 Onshore Environmental surveys found two vegetation types from the survey areas which support a vegetation structure and composition that shows affinities with the 'Coastal sands dominated by *Acacia rostellifera, Eucalyptus oraria* and *Eucalyptus obtusiflora* Priority Ecological Community (PEC)' (Priority 1):

- HS Eoo - Shrub Mallee of *Eucalyptus obtusiflora* subsp. *obtusiflora* over Open Dwarf Scrub D of *Rhagodia latifolia* subsp*. recta, Roepera fruticulosa* and *Tetragonia implexicoma* over Very Open Herbs of **Brassica tournefortii* and **Urospermum picroide*s on brown sand on hillslopes and gullies; and
- HS Eo - Low Grass of **Ehrharta longiflora* and *Austrostipa flavescens* with Open Shrub Mallee of *Eucalyptus oraria* and *Eucalyptus fruticosa* and Dwarf Scrub C of *Rhagodia preissii* subsp. *obovata*, *Rhagodia latifolia* subsp*. recta* and *Tetragonia implexicoma* on brown sand on hillslopes.

It was determined (Onshore, 2022a) that the two vegetation types were not aligned with the 'Coastal sands dominated by *Acacia rostellifera, Eucalyptus oraria* and *Eucalyptus obtusiflora* PEC' owing to the absence or sparse occurrence of the characteristic tall shrub *Acacia rostellifera*, differences in landform and soil type (not occurring on dunal sands), and extended distance from known occurrences of the PEC (>100 km north of the nearest known PEC occurrence).

220,000 222,000 224,000 226,000

6,902,000 6,900,000 6,898,000 6,896,000

N

George Grey Dr

Legend

Project Tenements
Amended Clearing Boundary

Vegetation Units

1
10
11
12
13
14
15
16
2
3
4
5
6a
6b
6c
6d
7
8
9
HS Ar
HS Ar OKR
HS BdAb
Cleared

Scale: 1: 25,000
Original Size: A3

Grid: GDA94 / MGA zone 50 (EPSG:28350)

0 0.5 1 km

Australian Garnet Pty Ltd
Lucky Bay Garnet Windfarm Project

Figure 3

Vegetation Communities of the Lucky Bay Garnet Windfarm Project and Surrounding Areas

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W:\Australian Garnet\Approvals 2021\02 Environmental Approvals\NVCP\CPS 8358\8358 Amendment 2022\3) Refs\GIS\Lucky Bay Windfarm NVCP.qgz 18/03/2022 F3 Vegetation Units

3.2 FAUNA AND HABITAT ASSESSMENTS

3.2.1 Habitats

Three fauna habitat types were identified within the greater Lucky Bay Garnet Area during the survey conducted by Bamford Consulting Ecologists (Bamford and McHarrie 2013) and Onshore Environmental (2022b). Acacia Shrubland exists primarily within the Lucky Bay Garnet Windfarm Project Purpose Permit Area (Figure 4). A description of the habitat in the Project Area is provided below.

3.2.1.1 Acacia Shrubland

This habitat provides microhabitats in the form of small logs and other debris, soft sand for burrowing species, a dense lower storey, and thick leaf litter and ground cover. The habitat within the study area has been subjected to multiple disturbances and was generally degraded. Large portions of this habitat had previously been cleared for pasture with areas supporting regrowth vegetation. The habitat is generally of low value and is unlikely to support conservation significant fauna species (Onshore, 2022a).

3.2.2 Conservation Significant Species

3.2.2.1 Threatened Fauna listed under the Biodiversity Conservation Act 2016 and Environment Protection and Biodiversity Conservation Act 1999

No vertebrate fauna species listed under BC Act or EPBC Act was recorded within the Project Area (Onshore 2022b).

3.2.2.2 Fauna recognised by the Department of Biodiversity, Conservation and Attractions

The initial study by Ecoscape (2009) did not identify any fauna of conservation significance within the Lucky Bay Garnet Project tenements. The 2013 field survey conducted by Bamford Consulting Ecologists recorded six vertebrate species of conservation significance in the survey area s (Bamford and McHarrie,2013). The species recorded are listed in (Table 4).

Table 4: Conservation Significant Species recorded in 2013 field survey

Common Name	Scientific Name	Conservation Status
Birds		
White-browed babbler (wheatbelt form)	*Pomatostomus superciliosus*	CS2 P4
Splendid fairy-wren	*Malurus splendens*	CS3
Variegated fairy-wren	*Malurus lamberti*	CS3
White-winged fairy-wren	*Malurus leucopterus*	CS3
Inland thornbill	*Acanthiza apicalis*	CS3
White-browed scrubwren	*Sericornis frontalis*	CS3

The White-browed Babbler (*Pomatostomus superciliosus superciliosus*) was a Department of Environment Conservation (DEC, currently DBCA) listed Priority species at the time of the survey, it has since been de-listed.

The Splendid Fairy-wren, Variegated Fairy-wren, White-winged Fairy-wren, Inland thornbill and White-browed Scrubwren were DEC listed CS3 species at the time of the surveys (2013), however, have now also been delisted.

The 2021 field survey conducted by Onshore Environmental recorded one DBCA listed Priority fauna species within the survey area (Onshore, 2022b). The Zuytdorp Slider (*Lerista humphriesi - P3)* is a slender pale brown/grey skink

characterised by a series of dark dashes and lines. It inhabits Acacia shrublands on yellow sandplains and shelters under wood litter, loose sand and leaf litter (Wilson and Swan 2021). This species was recorded from pit-fall traps at four trap sites with a total of eight individuals recorded within the survey area (Onshore, 2022b). None of the individuals are located within the Lucky Bay Garnet Windfarm Project Purpose Permit Area and are unlikely to be impacted by the Project.

220,000 222,000 224,000 226,000

6,902,000

6,900,000

6,898,000

6,896,000

N

George Grey Dr

Legend

Project Tenements

Amended Clearing Boundary

Fauna Habitats

Acacia Shrubland

Melaleuca Shrubland

Pasture

Scale: 1: 25,000
Original Size: A3

Grid: GDA94 / MGA zone 50 (EPSG:28350)

0 0.5 1 km

Australian Garnet Pty Ltd
Lucky Bay Garnet Windfarm Project

Figure 4

Fauna Habitats of the Lucky Bay Garnet Windfarm Project and Surrounding Areas

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3.2.2.3 Threatened Fauna listed under the BC Act and EPBC Act

No threatened vertebrate fauna species listed under the EPBC Act or Scheduled under the BC Act were recorded from the Lucky Bay Garnet Project Area, including the Lucky Bay Garnet Windfarm Project Area.

3.3 HYDROLOGY

The Lucky Bay Garnet Project Area is located in the coastal subcatchment of the Greenough River basin. It lies within the Northampton Coast surface water management area. The catchment is characterised by numerous small catchments that drain internally to local depressions with no clearly defined drainage lines or connection to other catchments. There are no surface drainage features within or adjacent to the Project Area. The low relief and sandy costal soils do not facilitate surface water flows (URS,2010).

The Lucky Bay Garnet Project Area is located near the southern end of the onshore Carnarvon Basin and consists of a relatively thin layer of Quaternary alluvial, aeolian and shoreline deposits, named the Superficial Formations, unconformably overlying the Ordovician-aged Tumblagooda Sandstone. Approximately 30 km to the east of the Project Area are the Proterozoic rocks of the Northampton Block inlier. The groundwater levels over the Project Area vary from about 0 m to 15 m Australian Height Datum (mAHD). Groundwater flow is in a west to south-westerly direction towards the coast and the hydraulic gradients are higher to the east of the mineral sand deposits which may reflect lower hydraulic conductivities in the Tumblagooda Sandstone than the Superficial Formations. Groundwater in the Project Area is fresh to brackish and used by local landholders for pastoral and agricultural activities (URS, 2010).

The Lucky Bay Garnet Windfarm Project will not influence groundwater or surface water flows or quality. There are no watercourses, wetlands or Public Drinking Water Source Areas, within or in close proximity to the Project Area.

4. ASSESSMENT OF CLEARING PRINCIPLES

Clearing applications are assessed against ten principles outlined in Schedule 5 of the EP Act 1986. These principles aim to ensure that all potential impacts resulting from removal of native vegetation are assessed in an integrated way and apply to all lands throughout Western Australia. The principles address four environmental areas: biodiversity significance, land degradation, conservation estate and ground and surface water quality.

Outcomes, discussion, potential impacts, and the additional management and mitigation measures (where necessary) associated with the amendment to the Purpose Permit Area for the Lucky Bay Garnet Windfarm Project are listed in Table 5.

Table 5: Assessment Against Clearing Principles

Principle	Clearing Principle	Outcome	Discussion and Potential Impact	Additional Mitigation and Management Measures
A	Native vegetation should not be cleared if it comprises a high level of biological diversity.	Not at variance	Biological diversity is not significantly different to other areas locally or regionally. No Threatened flora or fauna are located within the amendment area. There is potential for the spreading of existing weed species and the introduction of new weed species in the Project Area however, weed management conditions are present in the current approved clearing permit that will be adhered to when clearing, alongside the implementation of the Australian Garnet Clearing Procedure. Given the widespread nature of the vegetation communities and absence of threatened flora or fauna or ecological communities in the Purpose Permit Area, the proposed clearing is considered not at variance with Clearing Principle A.	No additional measures are proposed.
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.	Not at variance	The fauna surveys did not identify any Threatened or Priority fauna species occurring within the Lucky Bay Garnet Windfarm Project Area (Ecoscape 2009, Bamford 2013, Onshore 2022).	No additional measures are proposed.

Principle	Clearing Principle	Outcome	Discussion and Potential Impact	Additional Mitigation and Management Measures
			The fauna and fauna habitats occurring within the Project Area are considered to be typical of the region, and are well represented in surrounding areas (Ecoscape, 2009 Onshore 2022). As such, the proposed clearing is unlikely to impact significant habitat for Threatened or Priority fauna and is therefore not at variance to Clearing Principle B.	
C	Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, Threatened (rare) flora.	Not at Variance	Site specific surveys have not identified any Threatened Flora Species present within or adjacent to the approved or proposed amended Purpose Permit Area and is therefore not at variance to Clearing Principle C.	No additional measures are proposed.
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 (TEC).	Not at Variance	No TECs listed under either the EPBC Act or the BC Act are within the Lucky Bay Garnet Windfarm Project Area or surrounds. Therefore, the proposed clearing will have no impacts on a TEC and is not at variance to Clearing Principle D.	No additional measures are proposed.
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.	Not at Variance	The Purpose Permit Area is broadly mapped as Beard vegetation association 17: Shrublands; *Acacia rostellifera* thicket. Approximately 84% of the pre-European extent of	No additional measures are proposed.

Principle	Clearing Principle	Outcome	Discussion and Potential Impact	Additional Mitigation and Management Measures
			this vegetation association remains uncleared at the state, bioregional, and subregional level. The vegetation to be cleared is not significant as a remnant of native vegetation in an area that has been extensively cleared and the proposed clearing will not be at variance with Clearing Principle E.	
F	Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.	Not at Variance	There are no watercourses or wetlands within or nearby the approved or amended area. As such, the proposed clearing is not considered to be at variance with Clearing Principle F.	No additional measures are proposed.
G	Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.	Unlikely to be at variance	The landform of the Lucky Bay Garnet Windfarm Project Area is described as sandy hillslopes (Onshore Environmental, 2013 & 2022). While the sandy soils may be at risk of wind erosion if vegetation cover is removed, the small area of additional proposed clearing is unlikely to result in appreciable land degradation. As such, the Project is unlikely to be at variance with Clearing Principle G.	No additional measures are proposed.
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 areas.	Not at Variance	The amendment area is not within a conservation area or DWER managed lands. The nearest DBCA (formerly DPaW) managed land is the Utcha Well Nature Reserve,	No additional measures are proposed.

Principle	Clearing Principle	Outcome	Discussion and Potential Impact	Additional Mitigation and Management Measures
			located approximately 2.6 kilometres south of the Purpose Permit application area. The proposed clearing is unlikely to have any impact on any conservation areas and is not at variance with Clearing Principle H.	
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.	Unlikely to be at variance	There are no permanent water bodies, wetlands or groundwater dependent ecosystems near the Project. There are no water management areas in the Project Area. There are no surface drainage features within or adjacent to the Project Area. The proposed windfarm will not influence groundwater or surface water flows or quality and is unlikely to be at variance to Clearing Principle I.	No additional measures are proposed.
J	Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence of flooding.	Unlikely to be at variance	Overall, the proposed clearing will have no detectable increased impact on flooding potential for the Project Area or its immediate surrounds. Therefore, the proposed clearing will not be at variance with Clearing Principle J.	No additional measures are proposed.

5. CONCLUSION

The vegetation and habitats present within the amended Purpose Permit Area are well represented on a regional scale. It is considered there are likely to be only minor local impacts from loss and fragmentation of vegetation.

The proposed clearing will not impact significantly upon the ten clearing principles and a range of environmental management procedures are in place as per the original purpose permit application to ensure that clearing will be managed to minimise any potential adverse impacts.

6. REFERENCES

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APPENDICES

APPENDIX 1: PROOF OF OWNERSHIP

APPENDIX 2: ECOSCAPE.2009. HADDINGTON RESOURCES LUCKY BAY - LEVEL 1 FLORA AND FAUNA ASSESSMENT.

APPENDIX 3: ONSHORE ENVIRONMENTAL. 2013. LUCKY BAY GARNET PROJECT LEVEL 2 FLORA AND VEGETATION SURVEY. PREPARED FOR AUSTRALIAN GARNET PTY LTD.

APPENDIX 4: ONSHORE ENVIRONMENTAL. 2022A. LUCKY BAY GARNET PROJECT DETAILED FLORA AND VEGETATION SURVEY

APPENDIX 5: BAMFORD CONSULTING ECOLOGISTS. 2013. BALLINE GARNET PROJECT – FAUNA ASSESSMENT.

APPENDIX 6: ONSHORE ENVIRONMENTAL. 2022B. LUCKY BAY GARNET PROJECT DETAILED VERTEBRATE FAUNA SURVEY. PREPARED FOR AUSTRALIAN GARNET PTY LTD

APPENDIX 7: CLEARING RECORDS