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8/06/2021 Attention:		

Application for amendment to Clearing Permit CPS 7469/2 – Increase Size of Clearing Boundary and Increase the Amount of Clearing

Please find attached application for an amendment to a clearing permit (C4 Form). Aragon Resources Pty Ltd requests approval to increase the clearing permit boundary area from 196.85 ha to 925.34 ha (increase of 728.49) and increase the amount of clearing from 46 ha to 141 ha (increase of 95 ha). In addition to the above requested amendments, Aragon Resource may be required to clear 17 *Eremophila obliquisepala*, which have already been authorised for removal under Condition 9 (a)(ii).

To assist in the processing and assessment of this application, an index of documents submitted in support of this application is provided below:

- Form C4 Application for an amendment to a clearing permit;
- Aerial photograph clearly identifying the areas of vegetation proposed to be cleared (see Figures 1-5)
- Attachment A A summary of clearing impacts which also provides details of vegetation types/condition and the location of nearby records of flora species of conservation significance;
- Spatial files showing the new proposed clearing permit boundary area, as well as areas to be impacted by clearing and nearby records of conservation significant flora; and
- A copy of the Level 1 Reconnaissance and Targeted Flora Survey Report (Maia, 2017)

Should you require any additional information, or have any queries regarding this request, please contact me on to discuss.

Yours Sincerely

Dear



Attachment A

Summary of Clearing Impacts

Background

The purpose of the proposed clearing is to allow/facilitate access to the Regent Mining Area where development of Regent – Messiah open cut mining operations will take place and for future mine operations at Labouchere Mining Area.

The proposed clearing of an additional 95 ha of native vegetation accounts for 75 ha for the Regent Mine Area and 20 ha for future Labouchere Mine Area, this will occur partially on land that has been previously cleared of native vegetation. However, based on conceptual designs, areas of undisturbed vegetation will require clearing to establish the Regent Mining Area. The actual amount of clearing undertaken at Regent Mine Area is likely to be considerably less than 75 ha once mine area designs are finalised. This is because the proposed clearing area (Figure 3) has included two possible waste dump locations and only one will be in the final clearing area.

Flora and Vegetation

Details and descriptions of the vegetation within the proposed clearing permit envelope are provided in below Table 1. The total vegetation area outlined in Table 1 is 7.34 ha smaller than the application area as spatial data from the survey area completed by Maia in 2017 does not reach the outer edges of the whole application area. Despite this, it is visibly evident that the vegetation types shown in Figure 4 remain consistent throughout the amendment area and no clearing of native vegetation is proposed to occur in unsurveyed areas. While there are a large number of flora species of conservation significance known from the Regent and Labouchere Mining Areas which are within the proposed clearing envelope, only 17 *Eremophila obliquisepala* individuals will be impacted (Table 2). All other conservation significant species have been avoided when developing the mining area. Two possible haul road locations are included in Figure 3 which avoid all priority flora. As a result of avoidance measures flora species of conservation significance that will require removal are well below the removal limit set in current clearing permit CPS7469/2 condition 9. (a)(ii). In order to further reduce potential impacts to the significant species *Gunniopsis propinqua*, areas where this species have been recorded have been excluded from the clearing permit boundary with the exception of one species located in the centre of the envelope.

Measures, such as flagging and placing boundaries around conservation significant flora will be taken to ensure no more than 17 *Eremophila obliquisepala* and no other conservation significant species will be impacted by mining operations. Where *Indigofera gilesii* and *Thryptomene* sp. Leinster (B.J. Lepschi & L.A. Craven 4362) occur within the application area a 10 metre boundary with flagging will be placed to ensure condition 9. (b)(i) is adhered to.

The *Eremophila obliquisepala* proposed to be removed is rated as having low local significance due to the wide distribution, numbers in which it was located and the number and cover of the vegetation types in which it occurs (Maia, 2016).

The application area comprises low to moderate native vegetation diversity and no Threatened/ DRF species (Maia, 2016)

None of the recorded vegetation types are considered to be unique, restricted, associated with a watercourse or are of conservation significance, as all are locally common and occur in surrounding areas. (Maia, 2017).

No Priority or Threatened Ecological Communities have been identified in nearby areas (Maia, 2017) and the application area does not intersect the boundary of any conservation areas. The closest conservation area is situated more than 40 km east.

Table 1: Details and de	scription of vegetation	proposed to be cleared
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Vegetation Code		Vegetation Condition			Total (ba) % of veget				
Vegetation of	ouc	2	3	7	rotar (na)		Impacted		
ASL-1		194.15	30.32		224.47		31.13		
ASL-2		194.73	2.66		197.39		27.37		
ASL-3		86.29			86.29		11.97		
ASL-4		5.72			5.72		0.79		
ASL-5		29.75				29.75	4.12		
AWL-1		26.59				26.59	3.69		
MSL-1		72.98				72.98	10.12		
Disturbed		040.04	00.00	77.96		77.96	10.81		
Grand Lotal		610.21	32.98	77.96		721.15			
% of vegeta	ation	84.62	4.57	10.81					
Code			legetation Descrip	tion			Hahitat		
ASI -1	Snar	se Tall Acacia Sh	rubland of either	Acacia incurvaneur:	a or A	Stony flat and			
//02 1	aptai	neura with a Sparse	mixed Low Shrubla	ind (Eremophila phy	llopoda.	and quartz and	d ironstone slopes.		
	Ptilot	tus schwartzii, and S	Scaevola spinescens	s) and Isolated Low	Trees of				
	Acad	ia pruinocarpa and/	or A. citrinoviridis.	,					
ASL-2	Spar	se Tall Shrubland of	Acacia incurvaneur	a and/or A. rhodoph	loia with	Stony flat an	d undulating quartz and		
	a miz	ked Sparse Low Shi	ubland (Eremophila	jucunda subsp. jucu	unda, E.	ironstone pla	ins and ironstone hill		
	obliq	uisepala (P3), Ptilot	us schwartzii) and I	solated Low Trees of	of either	slopes.			
	Grev	illea berryana, Acac	ia citrinoviridis or A.	pruinocarpa.					
ASL-3	Oper	n Tall Shrubland of A	cacia incurvaneura	or A. aptaneura with	a mixed	Crests and u	ipperslopes of ironstone		
	LOW	Open Shrubland (E	remophia latropel s	subsp. Latrobel, E.	Jucunda Molloo	nilis.			
		p. Jucunua and Do	nonaea pacriyrieura cola	a) and +/- Scallered	iviallee				
ASI -4	Spar	se Tall Shrubland o	f Acacia aptaneura	and/or A xiphophyll	a with a	Quartz stony r	lains		
	Spar	se Low Shrubland	of Senna artemisi	oides subsp. oligor	ohvlla x	Quartz storry p	ianis.		
	helm	sii and Solanum las	iophyllum and a Spa	arse Chenopod Shru	bland of				
	Sclei	rolaena eriacantha,	Maireana georgei ar	nd Maireana villosa.					
ASL-5	Oper	n Tall Shrubland of	Acacia cuthbertsonii	subsp. cuthbertson	ii, +/- A.	Minor drainage	e lines and gullies.		
	incur	vaneura or A. rhoo	dophloia with a Spa	arse mixed Low Sh	rubland				
	(Dod	onaea petiolaris, Er	emophila glutinosa a	and E. exilitolia) and	Isolated				
A \ A / I = 1	LOW	Meedland to Low O	novinuis and/or Gre		tonouro	Low hind area	a depressions and broad		
	and	A cyneronhylla yar	cvneronhvlla with a	mixed tall shruhland	(Acacia	drainage lines	is, depressions and broad		
	cuth	bertsonii subsp.	Cuthbertsonii. A.	ramulosa var. lin	ophvlla.	aramage intes			
	Eren	nophila forrestii su	bsp. forrestii) and	a mixed Low Sh	rubland				
	(Indi	gofera monophylla	, Abutilon crypto	petalum and Enc	hylaena				
	tome	entosa var. tomentos	a.						
MSL-1	Spar	se mixed Shrubland	l (Senna glaucifolia,	Eremophila phyllop	oda and	Undulating qu	artz and ironstone stony		
	Ptilo	tus rotundifolius) a	nd a Sparse to O	pen Tussock Grass	sland of	plains.			
Disturbed	Arist	ida contorta.							
Vegetation	n								
Condition So	cale		Eremae	an and Northern B	otanical	Provinces			
1		N/A							
2		Pristine or nearly s	o, no obvious signs	of damage caused b	oy human	activities since	European settlement.		
3		Some relatively sli	ght signs of damage	e caused by human	activities	since European	settlement. For example		
	some signs of damage to tree trunks caused by repeated fire, the presence of some relatively non-aggres						relatively non-aggressive		
	weeds or occasional vehicle tracks.								
3	More obvious signs of damage caused by human activity since European settlement, including some obvious impact on the vegetation structure such as that caused by low levels of grazing or slightly aggressive week					t, including some obvious			
5	Still retains basic vegetation structure or ability to regenerate it after very obvious impacts of human activiti					pacts of human activities			
6		since European se	ttlement, such as gr	azing, partial clearin	g, freque	nt fires or aggres	ssive weeds.		
υ		severely impacted	by grazing, very free	quent lifes, clearing (on withou	t intensive man	activities. Scope for some		
		number of weed si	becies present inclu	ding very addressive	species		agement. Osually with d		
7	Areas that are completely or almost completely without native species in the structure of their vegetation.				re of their vegetation: i.e.				
		areas that are clea	at are cleared or 'parkland cleared' with their flora comprising weed or crop species with isolated native						
		trees or shrubs.							

Table 2: Flora records and impacts to flora species of conservation significance

Flora species recorded in nearby or adjacent areas (Maia, 2017)	Conservation status	Number Recorded (Maia, 2017)	Quantity permitted for removal	Quantity removed to date	Quantity permitted for removal remaining	Number impacted by proposed clearing
Eremophila obliquisepala	P3	3306	1584	87	1497	17
Gunniopsis propinqua	P3	50	1	0	1	0
Indigofera ?gilesii	P3*	2	0	0	0	0
Indigofera gilesii	P3	1	0	0	0	0
Stenanthemum mediale	P3	9	0	0	0	0
Thryptomene sp. Leinster (B.J. Lepschi & L.A. Craven 4362)	P3	10	0	0	0	0

* Likely to be Indigofera gilesii (P3)

One Beard Vegetation Association (BVA) has been mapped within the application area – BVA 18.5, which is well represented at a state-wide, regional, sub-regional and local government scale, with at least 99.68% of pre-European levels of native vegetation remaining (Government of Western Australia, 2018).

Beard Vegetation Association	Description		Extent in Amendment Area (ha)				
18	Low woodland; mu	Ilga (<i>Acacia aneura</i>	728.49				
Vegetation Statistics							
Region	Vegetation Association	Pre-European Extent	Current Extent	% Remaining	% Current Extent in All DBCA- Managed Land (proportion of Pre-European Extent)		
Ctatawida	18	19,892,306	19,843,148	99.75	6.62		
Statewide	29	7,903,991	7,898,973	99.94	6.28		
Murchison Bioregion	18	12,403,172	12,363,252	99.68	4.96		
	29	2,956,382	2,955,695	99.98	3.15		
Augustus Subregion	18	2,425,858	2,424,368	99.94	11.61		
	29	2,188,768	2,185,968	99.87	4.38		
Local Government Area	18	3,117,900	3,111,264	99.79	11.09		
	29	2,854,683	2,851,596	99.89	4.99		

Fauna

Given the small scale of the proposed clearing, and that the vast majority of clearing is to occur on locally common habitat, the vegetation to be cleared is not considered to offer significant habitat for local fauna species. In addition to this, according to available databases, there are no records of conservation significant fauna species known from the local area (20 km radius) (DBCA, 2007).

Watercourses, water quality, flooding and land degradation

The proposed clearing does not intersect any mapped watercourses, however the proposed Regent Mine Area does intersect minor drainage lines and gullies. While the mapped vegetation types have not been identified as riparian, impacts to watercourses will be minimised by avoidance measures wherever possible. Given that the proposed area of clearing is relatively small, impacts to the quality of surface/groundwater, erosion related and/or flooding issues are not anticipated or likely to occur.



Figure 1: Amendment application area



Figure 2: Existing and proposed clearing permit envelope







Figure 4: Vegetation types of the application area



Figure 5: vegetation condition rating of the application area