



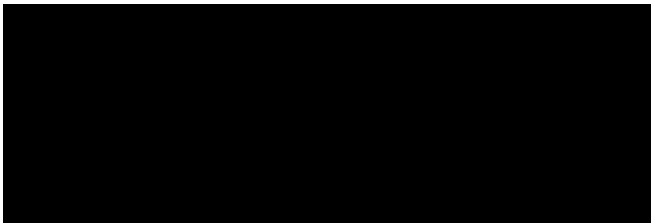
Coogee

Coogee Chlor Alkali Pty Ltd

ABN 72 009 276 635

24 September 2021

By email only



Dear Sir,

RE: NATIVE VEGETATION CLEARING PERMIT APPLICATION

Coogee Chlor Alkali Pty Ltd (CCA) proposes an expansion of its Kemerton Facility (located on Marriott Road, Kemerton) as an in-house managed project.

The proposed Third Expansion (TRES) Project seeks to expand chlorine production capacity from [REDACTED]. This expansion will involve the construction of the following major components along the southern boundary of the lease footprint as shown on Site Layout with Proposed Expansion Project and Proposed Expansion Plant in Attachment 3.

- New electrolysis system including transformer/rectifier
- New brine purification system
- Catholyte system for the new cell room
- Brine dechlorination system for the new cell room
- Chlorine gas drying and compression for the new cell room
- Chlorine gas export system
- New sodium hypochlorite production
- New caustic evaporation production (32% to 50%), capacity [REDACTED] chlorine equivalent

1. LOCATION

The existing facility is located on Part of Lot 1 on Diagram 73196 and Part of Lot 254 on Plan 416516.

The surrounding land uses are predominantly industrial and can be summarized as follows:

- North – BOC Gas
- East – Bushland
- South – Bushland
- West – Tronox

Marriott Road, Kemerton Industrial Park, WELLESLEY WA 6233
PO Box 5051, ROCKINGHAM BEACH WA 6969 | (08) 9797 4343 | www.coogee.com.au

CAPABILITY & COMMITMENT

2. REGULATORY FRAMEWORK

The site is a Major Hazard Facility subject to Dangerous Goods legislation due to the manufacture and storage of chlorine, which is highly toxic and a strong oxidiser in gaseous form.

The existing facility is located off Marriott Road, Kemerton and is a Major Hazard Facility. Operations are governed by the following instruments:

- Ministerial Statement 0066.
- DWER EP License L6036/1988/13 on File Number 2012/007290
- Dangerous Goods License DGS012178
- Safety Report
- DWER Licence to Take Water GWL100789(6)

3. NATIVE VEGETATION CLEARING REQUIREMENTS

In order to construct the works, the facility's footprint will need to be expanded through an extension of both leases to accommodate construction offices and laydown areas. Clearing of native vegetation has been estimated to a maximum of 3.26 Ha as shown in hatched areas of Attachment 4.

As shown by aerial photography the area nominated for clearing is comprised of low quality vegetation showing evidence of previous clearance and degradation.

4. FLORA, VEGETATION AND FAUNA SURVEYS

Specialist consultants have been engaged to carry out the following targeted field surveys as outlined in the Environmental Protection Authority (EPA) Technical Guidance: Flora and Vegetation Surveys for Environmental Impact Assessment (EPA 2016) and EPA Technical Guidance: Terrestrial Vertebrate Fauna Surveys for Environmental Impact Assessment (2020).

1. Winter (August) targeted survey for potential suitable habitat for threatened orchid species, *Drakaea elastica* (listed as Endangered under the EPBC Act and Critical under the BC Act) and *Drakaea micrantha* (listed as Vulnerable under the EPBC Act and Endangered under the BC Act).
2. Spring (September) detailed and targeted flora and vegetation survey, in line with the preferred timing for flora and vegetation and fauna surveys in the region.
3. Spring (September) basic fauna survey.
4. Targeted Black Cockatoo habitat assessment in accordance with the EPBC Act Referral Guidelines for Three Threatened Black Cockatoo Species (DSEWPac 2012) and DotEE's

(now DAWE) Revised draft referral guideline for three threatened black cockatoo species (2017). The tasks that will be undertaken include:

- A comprehensive assessment and mapping of Black Cockatoo breeding, foraging, and roosting habitat, including:
 - Foraging plant species and quality;
 - Presence of feeding signs; and
 - Targeted searches to identify potential and actual breeding trees and recording tree hollow presence/suitability. Locations of potential and actual breeding trees will be taken using a differential GPS unit.

5. Targeted Western Ringtail Possum survey will be undertaken in accordance with Department of Sustainability, Environment, Water, Population and Communities (DSEWPaC [now DAWE]) Survey Guidelines for Australia’s threatened mammals and Department of Parks and Wildlife (DPaW [now DBCA]) Western Ringtail Possum Recovery Plan (2017). The tasks that will be undertaken include:

- A comprehensive assessment and mapping of Western Ringtail Possum habitat; including:
 - Searching for dreys in Peppermint (or other midstorey) trees; and
 - Scat counts.

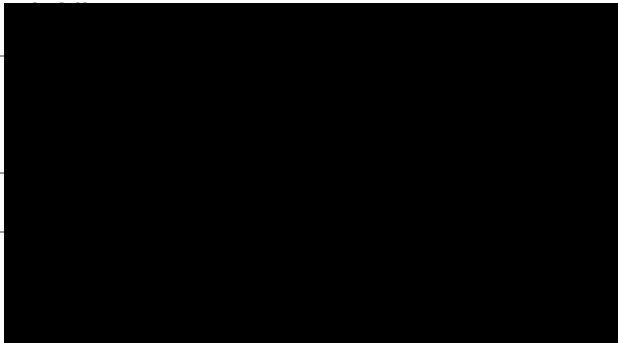
A consolidated flora, vegetation and fauna survey report and IBSA package is under preparation for submission to DWER to support this application. With the Winter survey completed in August and the Spring survey completed in mid-September, a final report is expected mid-October for submission.

Preliminary survey findings indicate the number of trees of foraging and breeding quality within the nominated area for clearing to be minimal, with no trees of nesting quality for black cockatoos identified due to the poor crown formation. There was no evidence of ringtail possum activities found within the area.

5. Stakeholder engagement

The following review Communication and Consultation Processes has been undertaken to identify key Stakeholders.

Table 1: Stakeholder Consultation

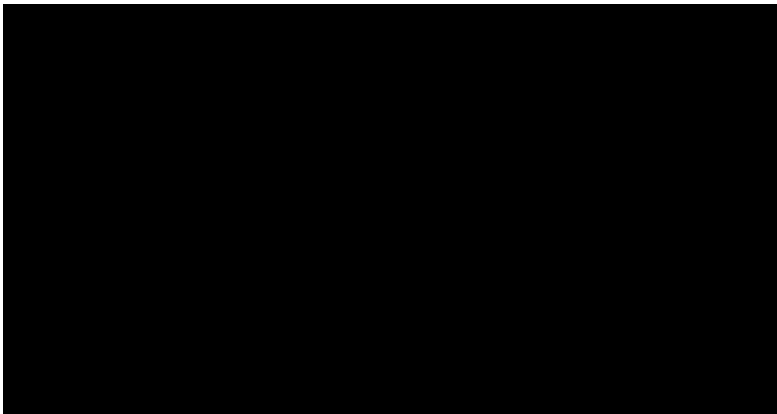
Stakeholder	Mechanism	Comments
Regulator DMIRS	Direct contact	
Regulator DWER	Direct contact	
Community	Direct contact	
Neighbours: Tronox / Cockburn Cement / BOC Gas / Western Power	Direct Contact	

6. OTHER APPROVALS

The following review of Approvals Processes has been undertaken to ascertain project requirements.

Table 2: Approval Requirements

Approvals	Type	Required	Comments
Department of Jobs, Tourism, Science and Innovation	Development Approval	No	
Local Government Shire of Harvey	Development Application Building Licenses Uncertified Building Approval Surveyors Certificate of Design Compliance Certificate of Construction Compliance Notice of Completion Building Classification	YES	<ul style="list-style-type: none"> Development approval (DAP/DA) Building Exemption
Port Authority¹	Development Application	NO	
Brookfield Rail / PTA	Rail Access / Crossing / Connection	NO	
National Office of Rail Safety	Rail Crossing/Connection	NO	
Department of Mines, Industry Regulation & Safety	Safety Case Pipeline Registration DG Licenses	YES	<ul style="list-style-type: none"> Safety Report DG Licence
Department of Water and Environmental Regulation	Works Approval Native Vegetation Clearing Permit Licence to Take Water Public Consultation	YES	<ul style="list-style-type: none"> Works approval EP and Groundwater Abstraction Licenses Land Clearing Permit
LandCorp	Site Lease	YES	<ul style="list-style-type: none"> Lease extension
DBNGP	Pipe Crossing	NO	
Dept. Of Main Roads	Crossing/Connection	NO	
Telstra	Communications	NO	
Western Power	Electricity Power	NO	
Alinta Gas	Gas	NO	
Other Pipeline Owners, e.g., BHP	Pipe Crossing	NO	



Index of Attachments

Attachment 1:	Application for a clearing permit (purpose permit) FORM C2	☒
Attachment 2:	Certificate of Titles	☒
Attachment 3:	Premises Maps	☒
Attachment 4:	Proposed Clearing Areas	☒
Attachment 5:	Proposed Fee Calculation	☒
Attachment 6:	Written authority to act on behalf of landowner, authority to access land and conduct clearing.	☒
Attachment 7:	Authorisation to act as representative of the occupier	☒
Attachment 8:	EFT Transaction Record for Native Clearing Permit Application Fee Payment	☒