

Premier Coal Pit 7 Exploration Drilling

January 2023



Native Vegetation Clearing Permit Amendment Application – Supporting Information

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1 INTRODUCTION

1.1 Background

Premier Coal Limited (Premier) operates the Premier Coal Mine (Premier Mine) located near Collie in the south west of Western Australia. The mine is operated under the *Collie Coal (Western Collieries) Agreement Act 1979* on Mining Lease 70/262SA. Current operations are approved under the *Environmental Protection Act 1986* through Ministerial Statement 416 (MS416) and Environmental Licence L5094.

As part of ongoing operations to supply coal for the domestic market, Premier intends to conduct exploration drilling in the area known as Pit 7 which comprises the CPS9654/1 Permit area (Permit area) and is outside of the approved development envelope of MS416.

Exploration activities are low impact in nature. This is recognized under Regulation 25 of the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004*, which exempts exploration activities approved under the *Mining Act 1978* from Native Vegetation Clearing Permit (NVCP) requirements. Pit 7 is not in an Environmentally Sensitive Area and the only reason the Regulation 25 exemption does not apply is that exploration approval is under the *Collie Coal (Western Collieries) Agreement Act 1979* and not the *Mining Act 1978*.

The location of the Premier Mine and Permit area is shown in Figure 1-1.

1.2 Purpose.

Premier applied for an NVCP on 14 March 2022 to support an exploration program starting in December 2022. The Department of Mines, Industry Regulation and Safety (DMIRS) approved CPS9654/1 on 18 November 2022. A copy of CPS9654/1 is provided in Attachment 2. A copy of the Decision Report is provided as Attachment 3.

CPS9654/1 approves clearing of up to 10 ha inside a 387 ha Permit boundary however imposes conditions that either restrict necessary exploration activities or exceed the requirements necessary to meet the desired environmental outcome. The purpose of this Native Vegetation Clearing Permit (NVCP) amendment application is the amendment of:

- Condition 3
- Condition 4
- Condition 7
- Condition 12a
- Condition 12d(ii)
- Condition 12d(iii)
- Condition 13a
- Condition 15(2)

Further detail on each condition to be amended is provided in Section 6.

Premier is also seeking an increase in the approved clearing area from 10 ha to 12 ha. This is because compliance with existing CPS9654/1 conditions requires additional clearing to access the same drill target sites.

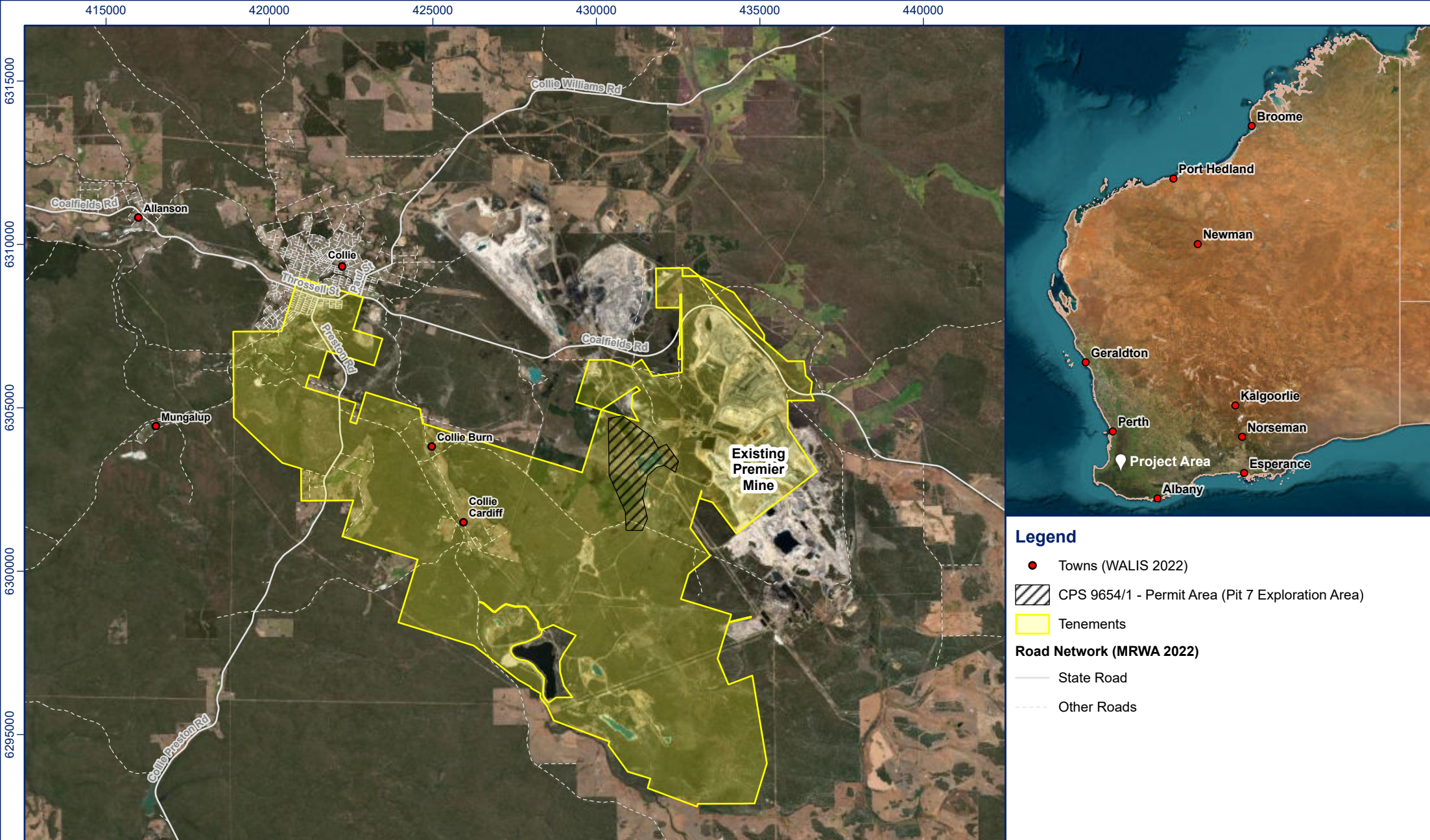
Premier wish to make a correction to the two minor editing errors in CPS9654/1 Conditions 15(2)(a) and 15(4). Further detail is provided in Section 7.

1.3 Index of Attachments


This document is Attachment 1 of this NVCP amendment application. The following documents are also provided as attachments to this amendment (Attachments 4, 5, 7 and 8 were also attached to the original NVCP application):

- Attachment 2: Clearing Permit CPS9654/1
- Attachment 3: Clearing Permit CPS9654/1 Decision Report
- Attachment 4: Detailed Flora and Vegetation Survey Pit 7 Exploration Area (OE 2022a).
- Attachment 5: Basic Vertebrate Fauna Survey Pit 7 Study Area (OE 2022b).
- Attachment 6: Spatial Data for Jarrah/Marri Hillslopes Habitat
- Attachment 7: Mining Lease 262SA
- Attachment 8: Letter of Authority

Spatial data are not included for the Permit area as this is not proposed to be changed in this amendment.



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PROJECT		CLIENT
January 2023	Premier Coal - Collie	 MANAGED BY THE YANCOAL AUSTRALIA GROUP
Figure 1-1		
ADV-AU-000380	Regional Location of the Premier Coal Mine	

2 ENVIRONMENTAL CHARACTERISTICS

2.1 Regional Setting

The 387 ha Permit area is within the Jarrah Forest bioregion, and the Southern Jarrah Forest Sub-region (JF2). The Southern Jarrah Forest subregion can be summarised as “duricrusted plateau of Yilgarn Craton characterised by jarrah-marri forest on laterite gravels, and in the eastern part by wandoo – marri woodlands on clayey soils. Eluvial and alluvial deposits support *Agonis* shrublands. In areas of Mesozoic sediments, jarrah forests occur in a mosaic with a variety of species-rich shrublands. The climate is warm Mediterranean” (Hearn et al. 2002).

2.2 Land Systems and Soils

The Premier Mine area lies within the Collie Basin which covers 230 km². The basin is divided into the Premier Sub-basin to the northeast and the Cardiff Sub-basin (where Pit 7 is located) to the south west. The sub-basins are separated by a basement high (Stockton Ridge) formed by a horst block. The Stockton Ridge is still covered by a thin layer of sediments. The Collie Basin contains three separate coal bearing formations (Ewington, Premier and Muja) which have been faulted creating several isolated structural settings across the basin.

The surface geology of the project area is overlain by Tertiary age gravels, sands and clays known as the Nakina Formation. A laterite cap has developed on the surface in places. The sediments between the coal seams are mainly sandstones with some siltstones and shales.

2.3 Flora and Vegetation

The Permit area is the Menzies Sub-district of the Darling Botanical District, in the South-West Botanical Province. The Menzies Sub-district (southern jarrah forest) covers a total area of 26,572 km², of which 18,715 km² (70 percent) originally supported jarrah and jarrah-marri forest (Beard 1981).

2.3.1 Vegetation Associations

The Premier Mine lies within the Bridgetown Vegetation System as recognised by Beard (1981). Within this system, there is one vegetation association that intersects the Permit area:

- Vegetation Association 3 – Medium Forest; Jarrah-Marri.

Vegetation Association 3 is well represented at all levels (statewide, bioregional [IBRA region and sub-region], and local government authority), with more than 56% of the pre-European extent remaining. Vegetation Association 3 is also well reserved, with more than 15% of the current extent protected for conservation within the Southern Jarrah Forest sub-region (OE 2022a, page 4).

2.3.2 Vegetation Complexes

The pre-1750 distribution of vegetation complexes of the southwest forest region of Western Australia has been mapped at 1:50,000 scale by Matiske and Havel (1998) as part of the biodiversity assessment for the comprehensive regional assessment for the southwest forest region. This database has been used to assess flora and vegetation values as part of the 1999 Regional Forest Agreement.

Onshore Environmental (OE 2022a, page 4) assessed this database as part of flora and vegetation studies. There are two vegetation complexes in the Permit area:

- Cardiff (CF) – Uplands: Open Woodland of *Allocasuarina fraseriana* – *Banksia* species – *Xylomelum occidentale* – *Nuytsia floribunda* on sandy soils on valley slopes in the subhumid zone; and
- Collie (CI) – Uplands: Open Forest of *Eucalyptus marginata* subsp. *marginata* – *Corymbia calophylla* – *Allocasuarina fraseriana* on gravelly sandy upland soils in the subhumid zone.

The Cardiff and Collie vegetation complexes currently have between 54 percent and 71 percent of their pre-European extents remaining within the South West Forest Region. Approximately 15 percent of the current extent of each complex is formally protected for conservation. Both vegetation complexes are therefore determined to be well represented (i.e. greater than 30% of the pre-European extent remaining), and well reserved (i.e. >10 percent of the current extent secured within formal reserves) (OE 2022a, page 5).

2.3.3 *Flora and Vegetation Surveys*

A detailed flora and vegetation survey of the 387 ha Permit area was conducted by Onshore Environmental in October/November 2019 and February 2022 (OE 2022a). A total of 363 plant taxa from 54 families and 173 genera were recorded from the study area. None of the plant taxa recorded from the study area were gazetted as Threatened Flora pursuant to the *Biodiversity Conservation Act 2016* (BC Act) or listed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

- 363 plant taxa from 54 families and 173 genera were recorded from the Permit area.
- No species listed as threatened under the *Biodiversity Conservation Act 2016* (BC Act) or *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) were identified in the Permit area.
- Two Priority 4 (taxa in need of monitoring) species were recorded: *Acacia semitrullata* and *Pultenaea skinneri*.
- Two plant taxa were considered to represent range extensions from their current known distributions: *Acacia trigonophylla* and *Aotus procumbens*.
- 23 introduced species were recorded.
- 13 vegetation types were recorded in 10 broad floristic formations.
- No Threatened Ecological Communities (TECs) listed under the BC Act or EPBC Act were identified.
- No Priority Ecological Communities (PECs) were identified.

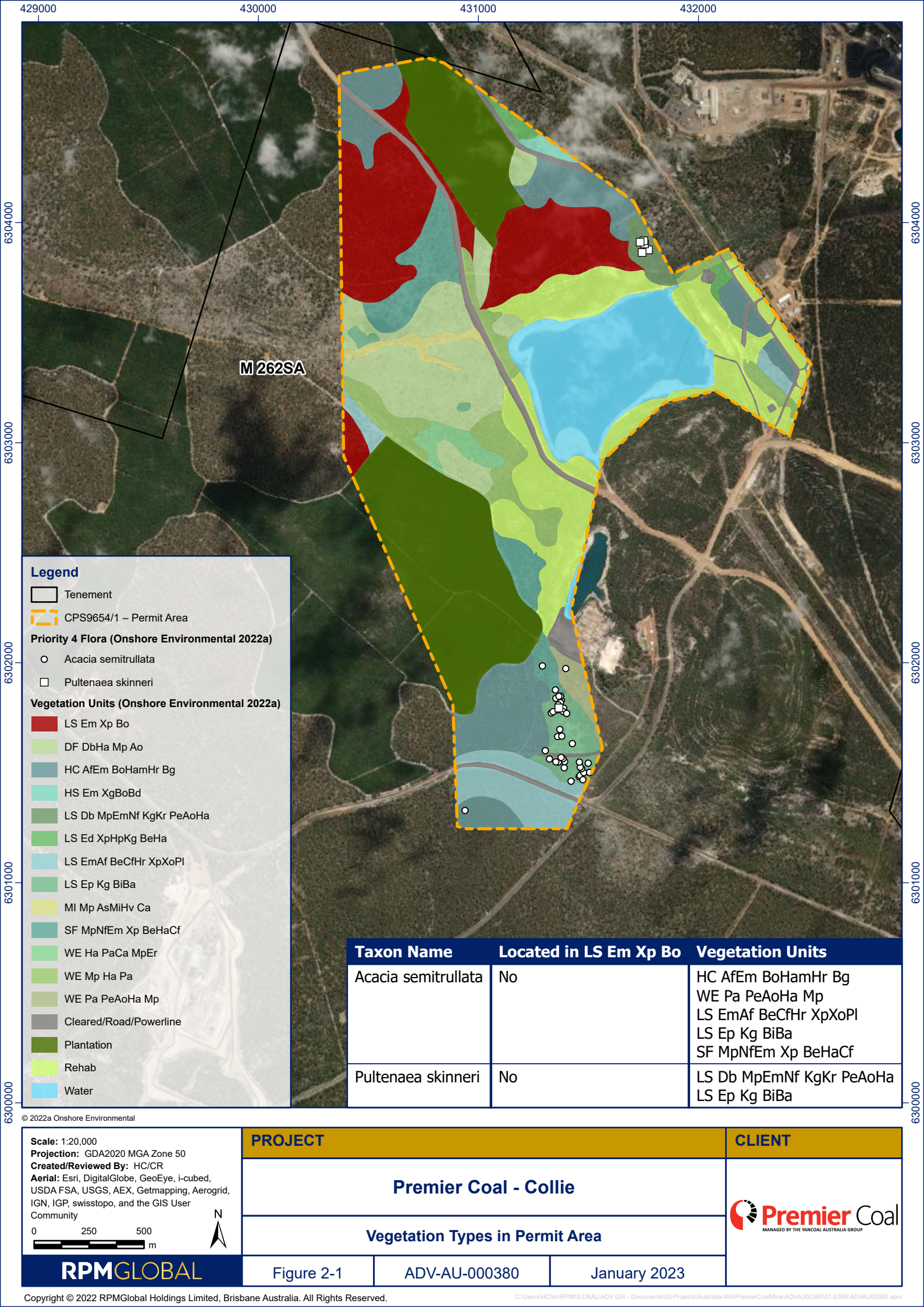
Vegetation types identified by OE (2022a) are described in Table 2-1. Approximately 48% of the Permit area does not support naturally-occurring native vegetation and consists of cleared ground, pine plantation, powerline corridors, native rehabilitation (post-mining), roads, and water filled mining voids. Outside of these areas vegetation condition was predominately rated as very good or excellent, with a small proportion rated good, or degraded. Disturbances included historic logging, establishment of softwood plantation timber, historic mining and exploration, fire, and roads and tracks (OE 2022a).

TABLE 2-1 : VEGETATION TYPES MAPPED IN THE PERMIT AREA

Code	Broad Floristic Formation	Vegetation Description	Condition	Area (ha)	% Of Permit Area	% Of Naturally Occurring Native Vegetation
Hill Crests						
HC AfEm BoHamHr Bg	Allocasuarina Forest	Forest of <i>Allocasuarina fraseriana</i> and <i>Eucalyptus marginata</i> subsp. <i>marginata</i> over Dwarf Scrub D of <i>Bossiaea ornata</i> , <i>Hibbertia amplexicaulis</i> and <i>Hibbertia vaginata</i> , with Open Low Woodland B of <i>Allocasuarina fraseriana</i> , <i>Eucalyptus marginata</i> subsp. <i>marginata</i> and <i>Banksia grandis</i> on grey sand on hill crests and upper hill slopes.	Very Good	38.01	9.82	18.91
Hill Slopes						
HS Em XgBoBd	Eucalyptus Forest	Forest of <i>Eucalyptus marginata</i> subsp. <i>marginata</i> Dwarf Scrub D of <i>Xanthorrhoea gracilis</i> , <i>Bossiaea ornata</i> and <i>Banksia dallaneyi</i> (<i>Trymalium ledifolium</i>) on grey sand on upper hill slopes.	Very Good	1.34	0.35	0.67
Lower Slopes						
LS Em Xp Bo	Eucalyptus Forest	Forest of <i>Eucalyptus marginata</i> subsp. <i>marginata</i> (+/- <i>Allocasuarina fraseriana</i>) over Low Scrub A of <i>Xanthorrhoea preissii</i> over Dwarf Scrub D of <i>Bossiaea ornata</i> (mid slopes) or <i>Bossiaea eriocarpa</i> (lower slopes) on brown loamy sand on mid and lower hill slopes	Excellent	50.15	12.95	24.95
LS Em BeCfHr XpXoPI	Eucalyptus Forest	Forest of <i>Eucalyptus marginata</i> subsp. <i>marginata</i> (<i>Allocasuarina fraseriana</i>) over Low Heath D of <i>Bossiaea eriocarpa</i> , <i>Calytrix flavescens</i> and <i>Hibbertia vaginata</i> (<i>Babingtonia camphorosmae</i> , <i>Styphelia erubescens</i>), with Open Scrub of <i>Xanthorrhoea preissii</i> , <i>Xylomelum occidentale</i> and <i>Persoonia longifolia</i> (<i>Leptospermum erubescens</i> , <i>Allocasuarina humilis</i>) on grey sand on lower slopes.	Very Good	15.51	4.01	7.72
LS EwEd XpHpKg BeHa	Eucalyptus Woodland	Tree Mallee of <i>Eucalyptus decipiens</i> subsp. <i>decipiens</i> over Open Low Scrub A of <i>Xanthorrhoea preissii</i> , <i>Hakea prostrata</i> and <i>Kunzea glabrescens</i> (<i>Acacia saligna</i>) over Open Dwarf Scrub D of <i>Bossiaea eriocarpa</i> and <i>Hypocalymma angustifolium</i> on brown sand on lower slopes.	Good	2.51	0.65	1.25

Code	Broad Floristic Formation	Vegetation Description	Condition	Area (ha)	% Of Permit Area	% Of Naturally Occurring Native Vegetation
LS Ep Kg BiBa	Eremaea Heath B	Heath B of <i>Eremaea pauciflora</i> with Scrub of <i>Kunzea glabrescens</i> and Open Low Woodland A of <i>Banksia ilicifolia</i> and <i>Banksia attenuata</i> on grey deep sand on sandy lower slopes.	Good	8.68	2.24	4.32
LS Db MpEmNf KgKr PeAoHa	Dasypogon Low Heath D	Low Heath D of <i>Dasypogon bromeliifolius</i> with Open Low Woodland A of <i>Melaleuca preissiana</i> , <i>Eucalyptus marginata</i> subsp. <i>marginata</i> and <i>Nuytsia floribunda</i> , Open Scrub of <i>Kunzea glabrescens</i> and <i>Kunzea recurva</i> , and Open Dwarf Scrub C of <i>Pericalymma ellipticum</i> var. <i>ellipticum</i> , <i>Adenanthos obovatus</i> and <i>Hypocalymma angustifolium</i> on grey sand on lower slopes.	Good	3.88	1	1.93
Sandy Flats						
SF MpNfEm Xp BehaCf	Melaleuca Low Woodland A	Low Woodland A of <i>Melaleuca preissiana</i> , <i>Nuytsia floribunda</i> and <i>Eucalyptus marginata</i> subsp. <i>marginata</i> over Open Scrub of <i>Xanthorrhoea preissii</i> over Open Dwarf Scrub C of <i>Bossiaea eriocarpa</i> , <i>Hypocalymma angustifolium</i> , <i>Allocasuarina humilis</i> and <i>Calytrix flavescens</i> over Open Dwarf Scrub D of <i>Dasypogon bromeliifolius</i> on grey sand on sandy flats.	Very Good	16.86	4.35	8.39
Drainage Flats						
DF DbHa Mp Ao	Dasypogon Dwarf Scrub D	Dwarf Scrub D of <i>Dasypogon bromeliifolius</i> and <i>Hypocalymma angustifolium</i> with Open Low Woodland A of <i>Melaleuca preissiana</i> and Open Dwarf Scrub C of <i>Adenanthos obovatus</i> (<i>Kunzea recurva</i>) on grey loamy sand on open drainage flats.	Very Good	35.76	9.23	17.79
Wetland						
WE Mp Ha Pa	Melaleuca Forest	Forest of <i>Melaleuca preissiana</i> over Low Heath D of <i>Hypocalymma angustifolium</i> over Open Tall Sedges of <i>Tremula tremulina</i> on grey clay on wetland.	Very Good	17.82	4.6	8.86

Code	Broad Floristic Formation	Vegetation Description	Condition	Area (ha)	% Of Permit Area	% Of Naturally Occurring Native Vegetation
WE Ha PaCa MpEr	Hypocalymma Dwarf Scrub D	Dwarf Scrub D of <i>Hypocalymma angustifolium</i> over Open Tall Sedges of <i>Tremula tremulina</i> and <i>Cyathochaeta avenacea</i> with Open Low Woodland A of <i>Melaleuca preissiana</i> and <i>Eucalyptus rudis</i> subsp. <i>rudis</i> , Open Scrub of <i>Taxandria linearifolia</i> and <i>Hakea varia</i> , and Open Low Scrub B of <i>Astartea scoparia</i> , <i>Taxandria linearifolia</i> and <i>Melaleuca incana</i> subsp. <i>incana</i> on grey clay / clayey sand on wetland.	Very Good	4.06	1.05	2.02
WE Pa PeAoHa Mp	Tremula Tall Sedges	Tall Sedges of <i>Tremula tremulina</i> with Dwarf Scrub C/D of <i>Pericalymma ellipticum</i> , <i>Adenanthos obovatus</i> and <i>Hypocalymma angustifolium</i> , Open Low Woodland A/B of <i>Melaleuca preissiana</i> , and Open Scrub of <i>Xanthorrhoea preissii</i> , <i>Kunzea glabrescens</i> and <i>Kunzea recurva</i> on grey clayey sand on wetland.	Very Good	2.92	0.75	1.45
Minor Drainage Line						
MI Mp AsMiHv Ca	Melaleuca Low Woodland A	Low Woodland A of <i>Melaleuca preissiana</i> over Low Scrub B of <i>Astartea scoparia</i> , <i>Melaleuca incana</i> subsp. <i>incana</i> and <i>Hakea varia</i> over Very Open Low Sedges of <i>Cyathochaeta avenacea</i> on cream / grey silty clay loam narrowly incised minor drainage lines.	Very Good	3.51	0.91	1.74
		Total Naturally Occurring Native Vegetation		201.01	51.89	100.00
		Cleared		2.60	0.67	
		Plantation (Pine trees)		76.36	19.72	
		Powerline Corridors		1.67	0.43	
		Native Rehabilitation (post-mining)		51.90	13.40	
		Roads		9.74	2.51	
		Water Filled Mining Voids		44.01	11.36	
		Total Permit Area		387.29	100.00	-



Legend

- Tenement
- CPS9654/1 – Permit Area

Priority 4 Flora (Onshore Environmental 2022a)

- Acacia semitrullata
- Pultenaea skinneri

Vegetation Units (Onshore Environmental 2022a)

- LS Em Xp Bo
- DF DbHa Mp Ao
- HC AfEm BoHamHr Bg
- HS Em XgBoBd
- LS Db MpEmNf KgKr PeAoHa
- LS Ed XpHpKg BeHa
- LS EmAf BeCfHr XpXoPl
- LS Ep Kg BiBa
- MI Mp AsMiHv Ca
- SF MpNfEm Xp BeHaCf
- WE Ha PaCa MpEr
- WE Mp Ha Pa
- WE Pa PeAoHa Mp
- Cleared/Road/Powerline
- Plantation
- Rehab
- Water

Taxon Name

Located in LS Em Xp Bo

Vegetation Units

Acacia semitrullata

No

HC AfEm BoHamHr Bg
WE Pa PeAoHa Mp
LS EmAf BeCfHr XpXoPl
LS Ep Kg BiBa
SF MpNfEm Xp BeHaCf

Pultenaea skinneri

No

LS Db MpEmNf KgKr PeAoHa
LS Ep Kg BiBa

Scale: 1:20,000

Projection: GDA2020 MGA Zone 50

Created/Reviewed By: HC/CR

Aerial: Esri, DigitalGlobe, GeoEye, i-cubed,
USDA FSA, USGS, AEX, Getmapping, Aerogrid,
IGN, IGP, swisstopo, and the GIS User
Community

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Premier Coal - Collie

Vegetation Types in Permit Area

Figure 2-1

ADV-AU-000380

January 2023



2.4 Vertebrate Fauna and Habitat

A basic vertebrate fauna survey was conducted within the Pit 7 area in December 2021 and January/February 2022 (OE 2022b). Three fauna habitats were identified in the Permit area:

- **Jarrah/Marri Forest on Hillslopes** – Jarrah (*Eucalyptus marginata*) and Marri (*Corymbia calophylla*) forest and an open low/mid shrub understorey. Contains hollows in large old trees and also has trees with potential for hollows to form in future and potentially provides habitat for Black Cockatoos. Also includes areas with large dead logs that may be suitable as Den sites for chuditch, dense leaf litter and scattered areas of outcropping laterite. Includes post-mining native rehabilitation areas.
- **Wetland/Drainage Zone** – Open tree overstorey of Melaleuca preissiana with scattered Jarrah and Flooded Gum (*Eucalyptus rudis*) on flats with grey clayey sands. Overstorey is less dense and supports fewer hollow-bearing trees than Jarrah/Marri Forest on Hillslopes. The dense understorey is good cover for small mammals, reptiles and birds.
- **Pine Plantation** – Plantations of *Pinus radiata* on grey sands on hillslopes. Provides very little value as fauna habitat, however, does have foraging value for Black Cockatoos.

The habitat types identified are not restricted and are regionally common (OE 2022b, page ii). Habitat areas are provided in Table 2-2 and shown on Figure 2-2.

TABLE 2-2: FAUNA HABITATS IN THE PERMIT AREA

Fauna Habitat	Area (ha)	% Of Permit Area	% Of Total Habitat
Jarrah/Marri Hillslopes	166.8	43.0	50.2
Wetland/Drainage Zone	88.8	22.9	26.8
Pine Plantation	76.4	19.7	23.0
Total Fauna Habitat	332.0	85.6	100.0
Powerline	1.7	0.5	-
Road	9.6	2.5	-
Water	44.2	11.4	-
Total Permit Area	387.5	100.0	-

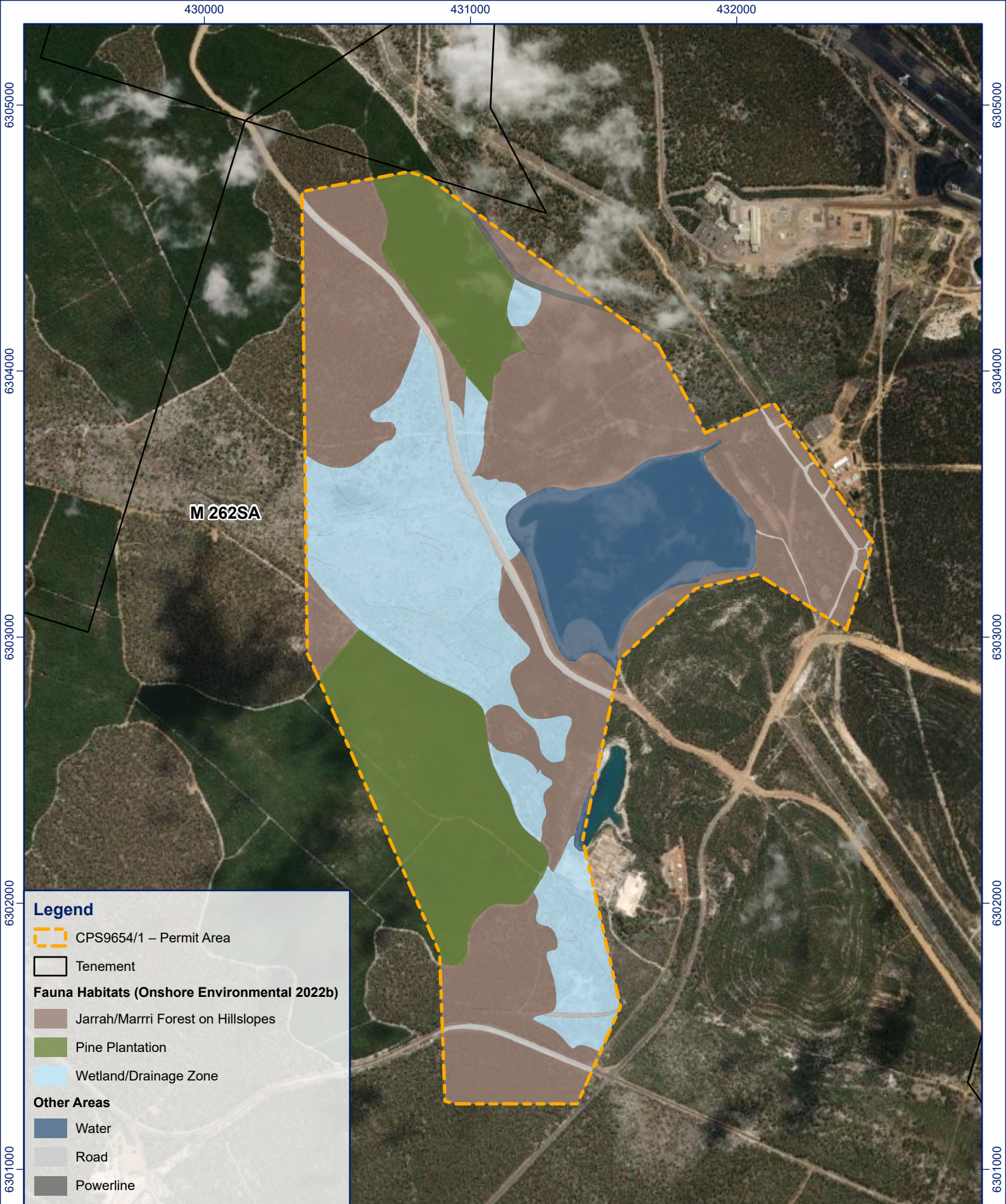
Habitat quality is variable in the Permit area and access tracks, historic mining, logging, fire and dumping are the most significant contributors to decreased habitat quality. Habitat condition was rated good to excellent in areas of naturally-occurring vegetation and pine plantation rated as completely degraded. Areas that have been heavily logged and burnt or rehabilitated after mining have no large trees and a more open understorey, which decreases the availability of hollows and increases pressure from feral predation. Firewood cutting also reduces the availability of log litter which is used as shelter and den sites. Evidence of feral animal disturbance included grazing by pigs; rabbit latrines and warrens, and bees occupying tree hollows.

A total of 235 vertebrate fauna taxa including ten amphibians, 161 birds, four fish, 30 mammals and 30 reptiles have the potential to occur within or surrounding the study area. The habitats within the study area are likely to support 14 conservation significant fauna species (Table 2-3).

TABLE 2-3: CONSERVATION SIGNIFICANT FAUNA LIKELY TO OCCUR IN THE PERMIT AREA

Common Name	Scientific Name	BC Act	EPBC Act	DBCA
Forest Red-tailed Black Cockatoo	<i>Calyptorhynchus banksii naso</i>	Vu	Vu	
Baudin's Cockatoo	<i>Calyptorhynchus baudinii</i>	En	En	
Carnaby's Cockatoo	<i>Calyptorhynchus latirostris</i>	En	En	
Woylie	<i>Bettongia penicillata ogilbyi</i>	Cr	En	
chuditch	<i>Dasyurus geoffroii</i>	Vu	Vu	
Western Ringtail Possum	<i>Pseudocheirus occidentalis</i>	Cr	Cr	
South-western Brush-tailed Phascogale	<i>Phascogale tapoatafa wambenger</i>	SCI		
Peregrine Falcon	<i>Falco peregrinus</i>	Os		
Western Brush Wallaby	<i>Notamacropus irma</i>			P4
Tammar Wallaby	<i>Notamacropus eugenii derbianus</i>			P4
Quenda	<i>Isoodon fusciventer</i>			P4
Dell's Skink	<i>Ctenotus delli</i>			P4

Vu = Vulnerable; En = Endangered; Cr = Critically Endangered; SCI = Special Conservation Interest; Os = Other Specially Protected; P = Priority.




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Scale: 1:18,000
 Projection: GDA2020 MGA Zone 50
 Created/Reviewed By: HC/CR
 Aerial: Esri, DigitalGlobe, GeoEye, i-cubed, USDA FSA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

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PROJECT			CLIENT
Premier Coal - Collie			 Premier Coal <small>MANAGED BY THE VANCOL AUSTRALIA GROUP</small>
Habitat Types in Permit Area			
Figure 2-2	ADV-AU-000380	January 2023	

2.5 Dieback

Phytophthora cinnamomi is a type of water mould or pathogen found in the soil, which kills susceptible plants such as banksias, jarrah and grass trees by attacking their root systems. Dieback is a symptom of a Phytophthora infection and affects more than 40% of the native plant species and half of the endangered species in the south-west of Western Australia.

CPS9654/1 Condition 9 requires vehicle hygiene measures and Condition 10 requires the preparation of a Dieback Management Plan in consultation with the Department of Biodiversity, Conservation and Attractions (DBCA) including requirements for dieback surveys in clearing areas.

2.6 Current Land Use

The Collie Basin Land-use Working Group (1987) listed the primary land-uses in the Collie Basin, in order of priority, as: coal mining, energy infrastructure, water protection/supply, urban, recreation, conservation, forest products, agriculture and quarrying.

Land use within the Permit area primarily consists of State Forest that is managed by DBCA. Current and historical land uses within the Permit area include native timber logging, pine plantations, coal mining, access tracks and power and water infrastructure.

3 EXPLORATION ACTIVITIES

CPS9654/1 allows clearing of up to 10 ha for coal exploration purposes. A description of exploration activities is provided under the subheadings below.

3.1 Access Tracks

Access tracks will be 4 metres in width and will be planned to provide the most direct route practicable to each drill site, where CPS9654/1 Conditions 7 and 12 allow.

There are existing access tracks and roads in the Permit area, which will be used where practicable and if CPS9654/1 Conditions 7 and 12 do not preclude this.

A photo of a typical access track is provided in Plate 1. This photo is not from the Permit area and Premier has not undertaken any clearing under CPS9654/1 at the time of this amendment application.

PLATE 1: TYPICAL EXPLORATION TRACK LEADING TO A DRILL PAD



3.2 Exploration Drill pads

A total of 83 exploration holes are currently planned to be developed within the Permit area between 2023 and 2029 (Table 3-1). As with all exploration programs, the number and locations of drill holes are subject to revision as results become available.

Each drill pad site will be cleared of vegetation and be approximately 600 m² (20 m x 30 m). In order to contain groundwater lifted during drilling, a 3 m x 4 m sump will be excavated to a depth of 2 m and ramped at one end to allow for fauna egress. Wherever practically possible, or when not precluded by Conditions 7 and 12, drill pads will be located within existing cleared areas or lower density vegetation if the geological requirements of the drilling program are still able to be met.

TABLE 3-1: CURRENT EXPLORATION PLAN

Year	Exploration Holes
2023	23
2024	10
2025	10
2026	10
2027	10
2028	10
2029	10
Total Holes	83

A photo of a typical drill pad is provided in Plate 2. This photo is not from the Permit area and Premier has not undertaken any clearing under CPS9654/1 at the time of this amendment application.

PLATE 2: TYPICAL DRILL PAD



3.3 Seismic Survey Lines

To support the resource drilling programs seismic survey activities may also be carried out to allow mapping of geological features such as fault lines and to delineate the resource boundary. The seismic survey vehicles require an operating track width of 4.5 m and some vegetation disturbance will be needed where existing tracks are of insufficient width, or if new sections of track for seismic survey are required. Smaller and more mobile seismic monitors will be distributed either on foot or using All Terrain Vehicles (ATV) or similar.

Wherever practically possible, and when not precluded by CPS9654/1 Conditions 7 and 12, existing tracks and disturbed areas will be followed to minimise the area of vegetation requiring disturbance for the seismic surveys.

3.4 Vegetation Clearing

It is standard practice at Premier to avoid trees with a diameter at breast height (DBH) of greater than 500 mm during exploration clearing to ensure potential hollow-bearing trees are not disturbed. Other trees and large fallen timber that appears habitable for fauna will also be avoided wherever possible.

Clearing for access tracks will consist of track rolling with a raised blade wherever possible to minimise disturbance to vegetation, with some areas requiring lowered blade clearing to allow for safe access of drill rigs and supporting vehicles. Cleared vegetation will be stockpiled for later use in rehabilitation.

Condition 12 of CPS9654/1 mandates targeted surveys for threatened and Priority flora and prevents any clearing of these; Condition 13 sets out pre-clearance chuditch inspection requirements and Condition 14 mandates topsoil and vegetation stockpiling; rehabilitation; and monitoring requirements.

3.5 Rehabilitation

3.5.1 Drill Pads

At the end of each exploration program drill pads that are no longer required will be rehabilitated within 6 months from completion of drilling. This includes:

- Backfilling of sumps with previously excavated material.
- Cutting and capping drill collars 500 mm below ground level and backfilling.
- Stockpiled topsoil and vegetation will be respread over the site.
- Ripping where soil compaction has occurred.
- Monitoring in accordance with CPS9654/1 Condition 14.

3.5.2 Access Tracks

Access tracks developed each year that are no longer required for subsequent drilling programs will be rehabilitated within 6 months from completion of drilling. This includes:

- Respreading of topsoil and vegetation will be respread over cleared areas
- Ripping or scarifying as required to remediate any soil compaction.
- Strategic placement of large logs and fallen timber to prevent access to rehabilitated access tracks.
- Monitoring in accordance with CPS9654/1 Condition 14.

4 DMIRS CONSULTATION ON AMENDMENT

CPS 9654/1 was submitted to DMIRS on 14 March 2022 and granted on 18 November 2022. Premier reviewed the conditions of the permit and contacted DMIRS requesting further discussion. This occurred by phone on 6 December 2022 and by email on 7 December 2022.

5 ACTIVITIES AND RECORDS KEPT UNDER CPS9654/1

CPS9654/1 was granted on 18 November 2022 and permits clearing from 13 December 2022. Condition 15 details recordkeeping requirements and the current status of records is provided in Table 5-1.

TABLE 5-1: CPS9654/1 RECORD-KEEPING REQUIREMENTS

No	Relevant Matter	Specifications	Records
1	In relation to the authorised clearing activities generally.	(a) the location where the clearing occurred, recorded using a Global Positioning System (GPS) unit set to Geocentric Datum Australia 1994 (GDA94), expressing the geographical coordinates in Eastings and Northings; (b) the date that the area was cleared; (c) the size of the area cleared (in hectares); (d) actions taken to avoid, minimise, and reduce the impacts and extent of clearing in accordance with Condition 8; (e) actions taken to minimise the risk of the introduction and spread of weeds and dieback in accordance with Condition 9; and (f) actions taken in accordance with Conditions 5, 10 and 11.	No clearing has been undertaken since CPS9654/1 was granted.
2	In relation to habitat tree management pursuant to Condition 7 of this Permit.	the name and location of each habitat tree, recorded using a Global Positioning System (GPS) unit set to Geocentric Datum Australia 1994 (GDA94), expressing the geographical coordinates in Eastings and Northings, in accordance with Condition 6;	No clearing has been undertaken since CPS9654/1 was granted.
3	In relation to flora management pursuant to Condition 12 of this Permit.	(a) the name and location of each threatened flora and/or priority flora species, recorded using a Global Positioning System (GPS) unit set to Geocentric Datum Australia 1994 (GDA94), expressing the geographical coordinates in Eastings and Northings; (b) actions taken to demarcate each threatened flora and/or priority flora species recorded and their relevant buffers; and (c) actions taken to avoid the clearing of threatened flora and/or priority flora species.	There are no threatened flora species in the Permit area. The locations of two priority 4 species are recorded in the flora survey report provided to DMIRS and in IBSA data uploaded. No clearing has occurred since CPS9654/1 was granted.

No	Relevant Matter	Specifications	Records
4	In relation to fauna management pursuant to condition 13 of this Permit.	<p>(a) the date(s) of inspection(s) by the fauna specialist;</p> <p>(b) a description of the fauna specialist inspection methodology employed; the location of each chuditch (<i>Dasyurus geoffroii</i>) individual identified, recorded using a GPS unit set to GDA94, expressing the geographical coordinates in Eastings and Northings or decimal degrees;</p> <p>(c) the date each chuditch (<i>Dasyurus geoffroii</i>) individual was identified;</p> <p>(d) the date(s) each identified chuditch (<i>Dasyurus geoffroii</i>) individual moved on to adjacent suitable habitat or was relocated to adjacent suitable habitat and a description of the adjacent suitable habitat;</p> <p>(e) the location of each chuditch (<i>Dasyurus geoffroii</i>) den identified, recorded using a GPS unit set to GDA94, expressing the geographical coordinates in Eastings and Northings or decimal degrees;</p> <p>(f) the date each chuditch (<i>Dasyurus geoffroii</i>) den was identified;</p> <p>(g) a photo and description of each chuditch (<i>Dasyurus geoffroii</i>) den identified;</p> <p>the location of each replacement chuditch (<i>Dasyurus geoffroii</i>) den installed, recorded using a GPS unit set to GDA94, expressing the geographical coordinates in Eastings and Northings or decimal degrees;</p> <p>(h) the date each replacement chuditch (<i>Dasyurus geoffroii</i>) den was installed; and</p> <p>(i) a photo and description of each replacement chuditch (<i>Dasyurus geoffroii</i>) den installed and the surrounding suitable habitat.</p>	No clearing has occurred since CPS9654/1 was granted and subsequently no inspections have been undertaken.
5	In relation to the revegetation and rehabilitation management pursuant to Condition 14 of this Permit	<p>(a) The location of any areas revegetated and rehabilitated, recorded using a Global Positioning System (GPS) unit set to Geocentric Datum Australia 1994 (GDA94), expressing the geographical coordinates in Eastings and Northings;</p> <p>(b) a description of the revegetation and rehabilitation activities undertaken; and</p> <p>(c) the size of the area revegetated and rehabilitated (in hectares).</p>	No clearing has occurred since CPS9654/1 was granted and no revegetation has taken place.

6 PROPOSED AMENDMENTS

The proposed amendments to conditions and the relevant rationale for each are set out below. An analysis of the amended clearing permit against the relevant clearing principles is also provided in Section 8.

6.1 Condition 3: Area of Clearing

6.1.1 Current Condition

Condition 3 is: *The Permit Holder must not clear more than **10 hectares** of native vegetation within the area cross-hatched yellow in Figure 1 of Schedule 1.*

6.1.2 Existing Condition Requirements and Justification

Premier originally applied for 12 ha of clearing to support exploration however this was reduced to 10 ha in consultation with DMIRS.

6.1.3 Desired Amendment

The desired amendment is:

- *The Permit Holder must not clear more than **12 hectares** of native vegetation within the area cross-hatched yellow in Figure 1 of Schedule 1.*

6.1.4 Justification for Amendment

Premier predicted the amount of clearing required based on:

- The use of direct routes to proposed drill targets.
- The use of previously cleared areas where possible.

Condition 7 prevents Premier from clearing within 10 m of habitat trees and Condition 12 prevents Premier from clearing within 10 m of Priority flora. Implementation of these conditions will prevent Premier from using direct routes and accessing previously cleared areas requiring additional clearing of 2 ha to support the same exploration program.

The additional 2 ha will increase the amount of clearing in the 387 ha Permit area by 0.5 percentage points (2.6% to 3.1%). This increase is not expected to be at variance to the clearing principles as:

- The Permit area does not host any threatened flora species; Permit conditions require frequented targeted survey and prevent clearing of threatened and Priority flora.
- Vegetation types and fauna habitat types in the Permit area are not restricted and are regionally common.
- No TECs or PECs have been identified in the Permit area.
- Permit conditions prevent the clearing of habitat trees and require pre-clearance inspections for chuditch.
- Permit conditions require stockpiling of topsoil and vegetation; rehabilitation; and monitoring.

This increase is required to meeting existing clearing permit conditions. It is not Premier's intention to clear more than is necessary and this amendment is not required if the requested amendments to conditions 7 and 12 are approved.

6.2 Condition 4: Clearing Restricted.

6.2.1 Current Condition

Condition 4 states:

- *the Permit Holder shall not clear native vegetation within the areas shaded red in Figure 1 of Schedule 1.*

6.2.2 Existing Condition Requirements and Justification

DMIRS reasons for Condition 4 are described in Sections 2.3.1. and 2.3.2 of the Decision Report. These sections relate to the following clearing principles:

- Principle A - Native vegetation should not be cleared if it comprises a high level of biological diversity.
- Principle 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.
- Principle C - Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora.

The area shaded red in Figure 1 of Schedule 1 (excluded area) corresponds to vegetation type LS Em Xp Bo. Reasons for excluding vegetation LS Em Xp Bo are documented on page 3 of the Decision Report:

- *The relatively low extent present in the application area.*
- *Suitable habitat for numerous priority and threatened flora species.*
- *Threatened and priority fauna within [this vegetation type].*
- *Suitable habitat (foraging and potential breeding) for black cockatoo species.*
- *Threatened and priority fauna within [this vegetation type].*
- *Being the only vegetation type in excellent condition.*

Additional justifications are provided in Section 3.2.2:

- *the restricted clearing condition in vegetation type “LS Em Xp Bo” will ensure that high quality Jarrah/Marri trees are not disturbed for foraging and potential breeding.*
- *The Western Brush Wallaby and Quenda are known to inhabit a wide range of habitats including low Banksia woodlands, Jarrah/Marri woodlands and moist Melaleuca lowlands. While these priority species inhabit a wide range of habitats, potential impacts to Western Brush Wallaby and Quenda may be minimised by the use of a restricted clearing condition within vegetation type LS Em Xp Bo.*

The decision report acknowledges that there are no TECs and PECs in the Project area (Page 9).

6.2.3 Desired Amendment

The desired amendment is the removal of this condition.

6.2.4 Justification for Amendment

This condition prevents exploration drilling in the centre of the potential coal resource. It also precludes this area from the following environmental assessments to support future mining:

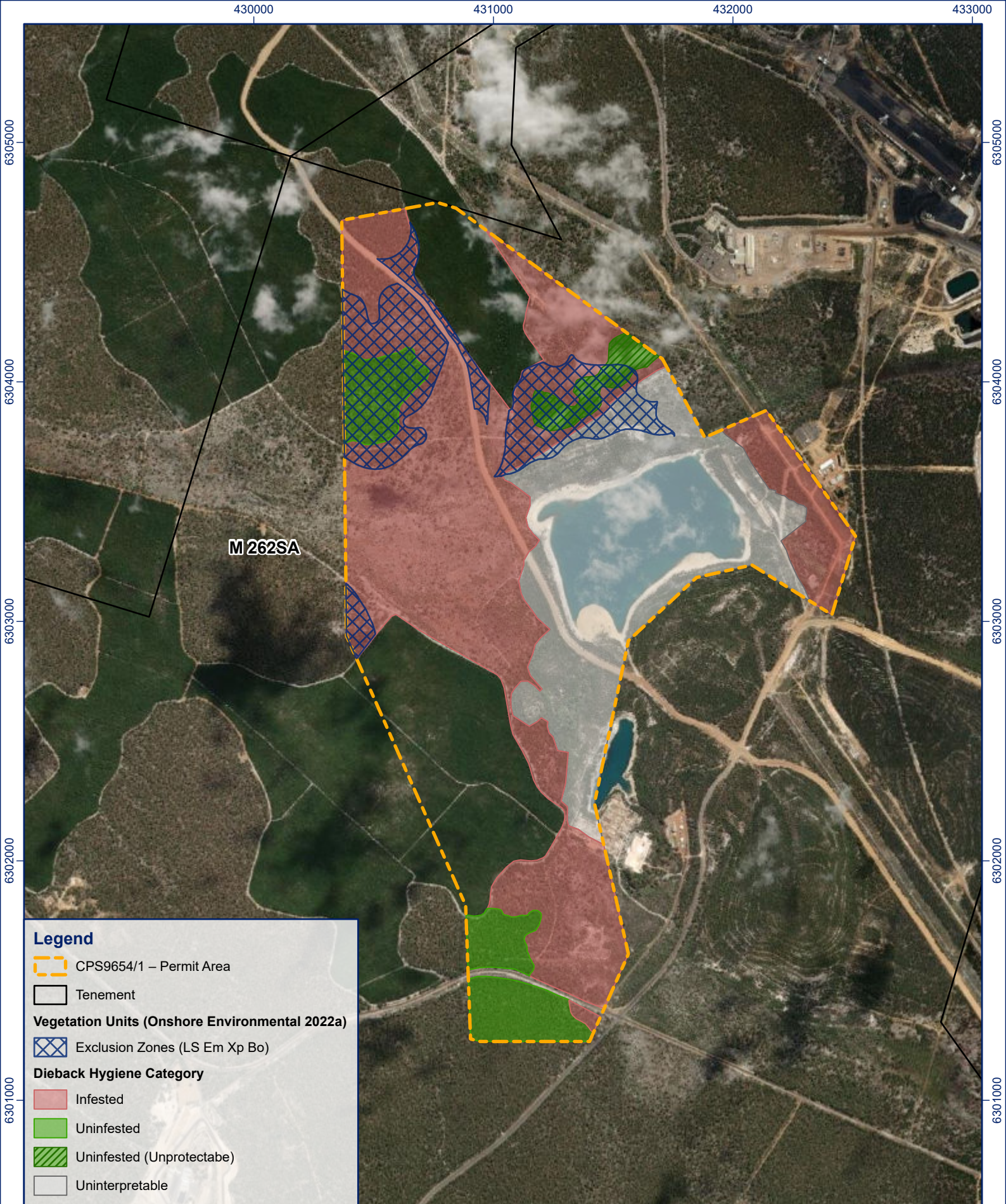
- Fugitive emissions sampling to characterise the greenhouse gas profile.
- Collection of waste characterisation samples from drill core.
- Installation of piezometers into old drill holes to inform hydrogeological studies and monitoring.
- Sampling of stygofauna to support environmental impact assessments.

Premier considers that proposed low-impact exploration disturbance inside the excluded area is not at variance with the Clearing Principles A and C for the following reasons:

- Vegetation LS Em Xp Bo does not have a relatively low extent. It is the most common native vegetation type in the Permit area comprising 50.15 ha or 24.95% of the 201 ha of naturally occurring native vegetation mapped (See Table 2-1). Note that 48% of the 387 ha Permit area does not support native vegetation and consists of cleared areas, historical mine voids, pine plantations and native rehabilitation areas.
- All 13 vegetation types identified in the survey, including LS Em Xp Bo, are well represented regionally, beyond the Permit area (OE 2022a, page ii).
- Vegetation LS Em Xp Bo is not associated with a TEC or PEC (OE 2022a, page ii).
- Targeted survey for threatened flora was undertaken in the Permit area and no threatened species were found (OE 2022a, page ii).
- Targeted survey for priority flora was undertaken in the Permit area and no priority species were found in LS Em Xp Bo. Two Priority 4 (taxa in need of monitoring) species are present in the Permit area, however only in other vegetation types that have not been excluded (See locations in Figure 2-1). Vegetation LS Em Xp Bo does not host unique habitat for priority and threatened flora species and is not necessary for the continued existence of threatened flora.
- The vegetation description table from the Flora Survey Report is included on page 19 of the Decision Report. This describes vegetation LS Em Xp Bo as in Excellent to Very Good condition and notes that there is historical mine exploration and frequent fire disturbance. Excellent on the Keighery vegetation scale does not mean there is no disturbance and there is already mine exploration disturbance evident in this vegetation type along with water pipelines and associated access tracks that support the nearby power station.
- Dieback mapping of the Permit area has since been undertaken and shows that most of the excluded area is infested with dieback (Figure 6-1) indicating that the vegetation is not pristine.
- Potential impacts to flora and biodiversity can be managed by the application of clearing permit conditions 12(a) that requires targeted surveys and 12(d) that prohibits clearing of threatened and priority species. These conditions were considered adequate by DMIRS to prevent impacts in other vegetation types, where conservation significant flora have been found.

Premier considers that the proposed exploration disturbance is not at variance with clearing Principle B as:


- None of the fauna habitats present are locally or regionally restricted (OE 2022b, page ii).
- Fauna habitat mapping includes several vegetation types within Jarrah/Marri Hillslopes habitat (See Figure 6-2). LS Em Xp Bo does not host fauna habitat unique to this vegetation type and additional protection for only this vegetation is not required to protect the broader Jarrah/Marri Hillslopes fauna habitat.
- Impacts to Cockatoo nest hollows and habitat trees can be effectively prevented by the 'no-clearing of habitat trees' condition that is applied in other vegetation types. It is not necessary to prohibit all clearing to prevent impacts to this important habitat.
- The Quenda and Western Brush Wallaby are Priority 4 species (taxa in need of monitoring) and (as stated on page 5 of the Decision Report) occupy a range of habitats. Diggings were recorded in Jarrah/Marri Hillslopes habitat (which includes vegetation types additional to LS Em Xp Bo) and in Wetland/Drainage zone habitat which is not subject to exclusion (OE 2022b, page 30).
- Premier is not proposing to clear significant blocks of vegetation and exploration clearing will be limited to clearing for tracks and drill pads in line with previous disturbance in the excluded area.
- Potential impacts to fauna and habitat can be managed by the application of clearing permit conditions that are considered adequate by DMIRS to prevent impacts to fauna habitat in other vegetation types.

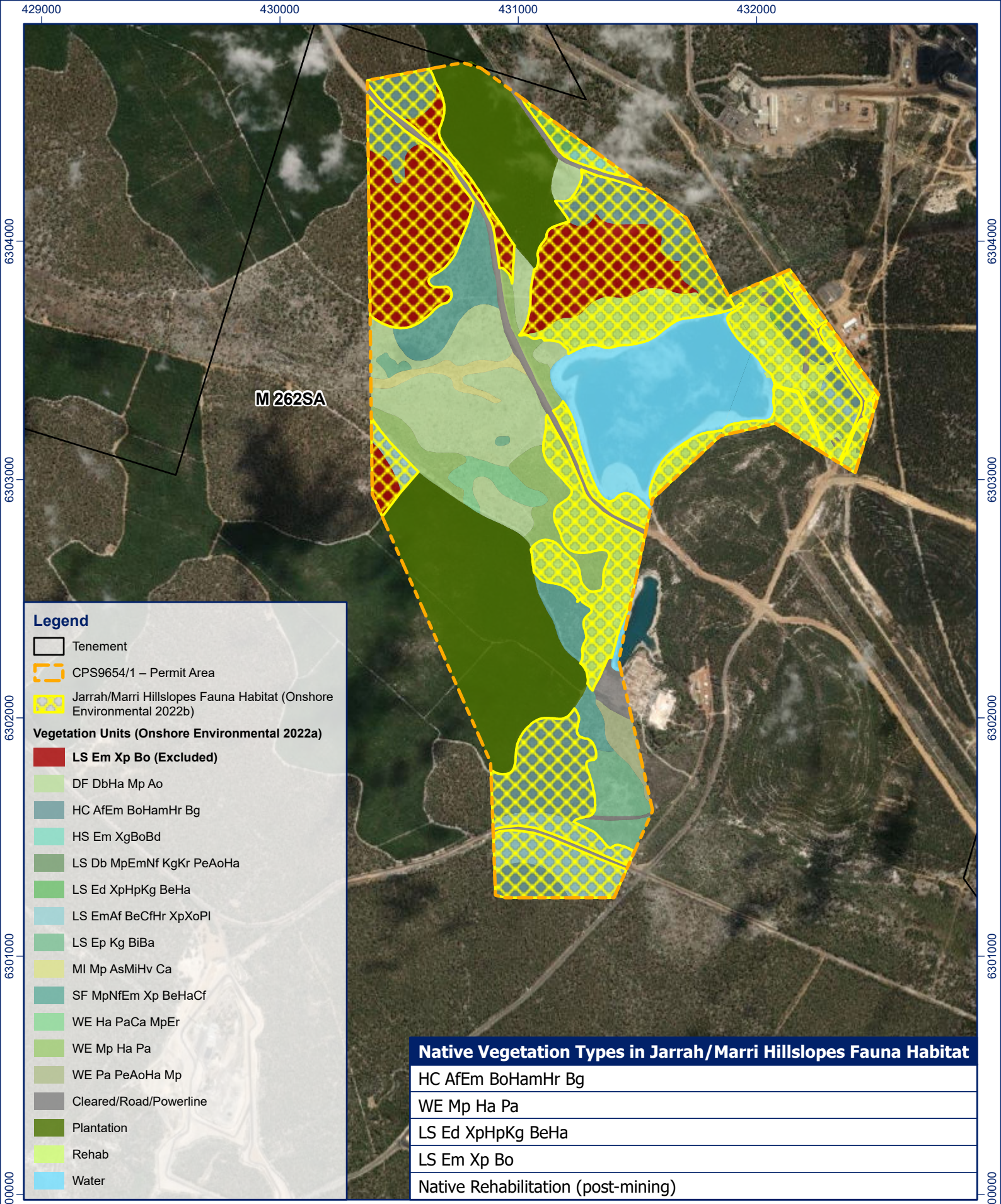


Scale: 1:20,000
 Projection: GDA2020 MGA Zone 50
 Created/Reviewed By: HC/CR
 Aerial: Esri, DigitalGlobe, GeoEye, i-cubed, USDA FSA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

0 250 500 m

RPMGLOBAL

PROJECT			CLIENT
Premier Coal - Collie			 MANAGED BY THE YANCOAL AUSTRALIA GROUP
Phytophthora Dieback Occurrence Map and Exclusion Zones			
Figure 6-1	ADV-AU-000380	January 2023	




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Scale: 1:20,000
Projection: GDA2020 MGA Zone 50
Created/Reviewed By: HC/CR
Aerial: Esri, DigitalGlobe, GeoEye, i-cubed, USDA FSA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

0 250 500 m

RPMGLOBAL

PROJECT		CLIENT
Premier Coal - Collie		 MANAGED BY THE YANCOAL AUSTRALIA GROUP
Vegetation Types in Jarrah/Marri Hillslopes Fauna Habitat		
Figure 6-2	ADV-AU-000380	

6.3 Condition 7: Clearing Not Authorised (tree diameter)

6.3.1 Current Condition

The current condition is:

- The Permit Holder must ensure that **no clearing occurs within 10 metres of any habitat trees.**

6.3.2 Existing Condition Requirements and Justification

Reasons for this Condition are described in Section 3.2.2. of the Decision Report, which is relevant to the following clearing principle:

- Principle 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.

Habitat trees are defined in Table 2 of the permit as trees that have a diameter, measured at 150 centimetres from the base of the tree, of 50 centimetres or greater (or 30 centimetres or greater for *Eucalyptus salmonophloia* or *Eucalyptus wandoo*). This definition includes trees without nest hollows.

Recognising the importance of habitat trees for black cockatoos, Premier committed to not disturbing any trees with hollows or any tree with a diameter at breast height greater than 50 centimetres in the clearing permit application. This ensures that no nest hollows, or future nest hollows are impacted.

The purpose of Condition 7 is to prevent impacts to Black Cockatoo habitat which include nesting hollows and trees that may develop nesting hollows in future. Section 3.2.2 of the Decision Report discusses the importance of nesting hollows and habitat trees. The recommended condition on page 5 is:

- *Fauna management (black cockatoo breeding habitat) - No clearing of trees that are greater than 50 centimetres in diameter at breast height (150 centimetres above ground level).*

The Decision Report does not include any discussion of the need for an additional 10 m buffer around habitat trees and Condition 7 of CPS 9654/1 appears to exceed the recommended condition to ensure that Clearing Principle B is met.

6.3.3 Desired Amendment

The desired amendment is:

- The Permit Holder must ensure that **no clearing of habitat trees occurs and no habitat trees are killed as a result of drilling activities.**

6.3.4 Justification for Amendment

Premier agrees that habitat trees should not be cleared, however does not agree that a 10 m buffer is required to ensure that habitat trees are protected.

Habitat tree density varies in the state forest and there may be areas where this 10 m restriction is not possible to achieve or results in an increase in clearing. For example, where a 4 m wide track is required to access a drill pad, a gap of 24 m would need to extend between two habitat trees (to allow for the 4 m wide track and a 10 m buffer from each of the two trees). This may result in additional clearing in order to find a route that meets this condition rather than choosing a more direct path. Plate 3 shows an existing exploration track inside the MS416 Development Envelope passing between habitat trees. No trees were impacted by this clearing and the use of this direct route would not be possible under CPS9654/1.

Additionally, application of the current condition may not allow sufficient space for suitable drill pads at required targets where tree density is high. Reducing the size of drill pads impacts the safety of operations.

Premier does not propose to condition and compact soil, as would happen on construction sites where Tree Protection Zones (TPZs) should be considered to protect the roots of habitat trees. Clearing of vegetation around habitat trees will not impact tree roots and there are no risks to habitat trees associated with clearing for exploration tracks and drill pads.

After clearing has occurred, the drill hole and sump may impact tree roots. Condition 7 imposes a 314 m² TPZ around each habitat tree and the areas of sumps and drill holes are compared to this TPZ in Table 6-1. A typical drill sump is 3.8% of the TPZ and a drill hole is 0.01% of the TPZ. As no other excavations are proposed, this is unlikely to impact the viability of habitat trees. Exploration drilling within 10 m of habitat trees has occurred for decades in the Collie area and no impacts have been noted. Photos of habitat trees unimpacted by adjacent clearing are provided in Plate 3, Plate 4, and Plate 5.

TABLE 6-1: SUMP AND DRILL HOLE AREAS COMPARED TO 10 M TREE PROTECTION ZONE

Area	Area (m ²)	% Of TPZ
10 m TPZ	314	-
Sump	12	3.8
Drill hole	0.04	0.01

The purpose of the 10 m restriction is the protection of habitat trees. Removal of the 10 m restriction will allow Premier to minimise clearing by using direct routes to drill targets, however the proposed outcomes-based condition that no habitat trees are killed as a result of drilling activities still captures the purpose of the 10 m restriction.

PLATE 3: ACCESS TRACK PASSING BETWEEN HABITAT TREES UNIMPACTED BY ADJACENT CLEARING



PLATE 4: HABITAT TREE ALONG POWERLINE CORRIDOR NOT IMPACTED BY ADJACENT CLEARING, ROAD CONSTRUCTION AND MAINTENANCE



PLATE 5: HABITAT TREE ADJACENT TO SHOTS RIVER ROAD NOT IMPACTED BY ADJACENT CLEARING OR ROAD CONSTRUCTION AND MAINTENANCE



6.4 Condition 12a: Flora Management (Survey)

6.4.1 Current Condition

The current condition is:

- *Prior to undertaking any clearing authorised under this Permit, the Permit Holder shall engage a botanist to conduct a targeted flora survey of the **Permit Area** for the presence of threatened flora listed in the Wildlife Conservation (Rare Flora) Notice and priority flora in accordance with EPA Technical Guidance.*

6.4.2 Existing Condition Requirements and Justification

Reasons for this Condition 12(a) are described in Section 3.2.1 of the Decision Report. The following clearing principles are relevant to this Section:

- Principle–A - Native vegetation should not be cleared if it comprises a high level of biological diversity
- Principle–C - Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora.

Condition 12(a) requires Premier to undertake a targeted survey of the entire 387 ha permit area even though only 10 ha of clearing is permitted. Condition 12(e) clarifies that a targeted survey less than two years old will satisfy this condition.

Section 3.2.1 of the decision report discusses the potential presence of threatened and priority flora and the need for flora conditions *to minimise impacts to priority and threatened flora from the proposed clearing activities* (page 3).

The recommended condition on page 4 is:

- *Flora – pre-clearing flora surveys and avoid any identified threatened or priority flora species.*

6.4.3 Desired Amendment

The desired amendment is:

- Prior to undertaking any clearing authorised under this Permit, the Permit Holder shall engage a botanist to conduct a targeted flora survey of **clearing areas** for the presence of threatened flora listed in the Wildlife Conservation (Rare Flora) Notice and priority flora in accordance with EPA Technical Guidance.

6.4.4 Justification for Amendment

Premier agrees that a targeted survey is required to ensure that threatened and priority flora are not impacted. Premier disagrees that a targeted survey of the entire Permit area is required to prevent impacts to threatened and priority flora. Targeted surveys should only be required in clearing areas as:

- threats from clearing will only occur in clearing areas.
- Application of condition 12(a) to clearing areas is sufficient to ensure that threatened and priority species are avoided in accordance with Principles A and C.
- Application of Condition 12 beyond clearing areas, and in this instance to an area 38 times larger than the approved clearing area does not provide any additional benefit in terms of avoiding threatened and priority flora.

6.5 Condition 12d(ii): Flora Management (Priority Flora)

6.5.1 Current Condition

Condition 12(d)(ii) currently states:

- *Where threatened flora or priority flora are identified in relation to Condition 12a of this permit, the Permit Holder shall ensure that no clearing of identified priority flora occurs.*

6.5.2 **Existing Condition Requirements and Justification**

Reasons for this condition are discussed in Section 3.2.1. of the Decision Report, which is relevant to the following clearing principles:

- Principle A - Native vegetation should not be cleared if it comprises a high level of biological diversity
- Principle C - Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora.

Section 3.2.1 of the decision report discusses the potential presence of threatened and priority flora and the need for flora conditions *to minimise impacts to priority and threatened flora from the proposed clearing activities* (page 3).

The recommended condition on page 4 is:

- *Flora – no clearing of priority flora (Acacia semitrullata and Pultenaea skinneri) identified within the application area.*

The condition has been applied to all priority flora and not just the two species recommended in the Decision Report.

6.5.3 **Desired Amendment**

The desired amendment is:

- Where threatened flora or priority flora are identified in relation to Condition 12a of this permit, the Permit Holder shall ensure that no clearing of identified priority flora occurs; **unless first approved by the CEO.**

6.5.4 **Justification for Amendment**

Premier agrees that clearing of priority flora should be avoided, however should be allowed with the permission of the CEO.

Premier considers this amendment is not at variance with Clearing Principles A and C as:

- Allowing for the permission of the CEO for clearing would be consistent with conditions 12(d)(i) and 12(d)(iii).
- The CEO will still be able to assess whether any proposed clearing of priority flora is at variance with the clearing principles, or if Premier has taken all practicable measures to avoid clearing of priority species without having to assess an additional amendment to CPS 9654/1 or a new clearing permit application.

6.6 **Condition 12d(iii): Flora Management (Priority Flora)**

6.6.1 **Current Condition**

Condition 12d(iii) currently states:

- *Where threatened flora or priority flora are identified in relation to Condition 12a of this permit, the Permit Holder shall ensure that no clearing occurs within 10 metres of identified priority flora, unless first approved by the CEO.*

6.6.2 **Existing Condition Requirements and Justification**

Reasons for this condition are discussed in Section 3.2.1. of the Decision Report, which is relevant to the following clearing principles:

- Principle A - Native vegetation should not be cleared if it comprises a high level of biological diversity
- Principle C - Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora.

Section 3.2.1 of the decision report discusses the potential presence of threatened and priority flora and the need for flora conditions *to minimise impacts to priority and threatened flora from the proposed clearing activities* (page 3).

The recommended condition on page 4 is:

- *Flora – no clearing of priority flora (Acacia semitrullata and Pultenaea skinneri) identified within the application area.*

The recommended condition and the Decision Report do not mention the need for a 10 m buffer around priority species. Condition 12(d)(ii) has been applied to all priority flora and not just the two species recommended in the Decision Report.

6.6.3 **Desired Amendment**

The desired amendment is the removal of this condition.

6.6.4 **Justification for Amendment**

Premier agrees that clearing of priority flora should be avoided, however a 10 m buffer is not required to prevent impacts to priority species.

Premier considers this amendment is not at variance with Clearing Principles A and C. The following points are the rationale for the amendment:

- Application of the condition may not allow sufficient space for suitable drill pads at required targets where priority flora density is high. Reducing the size of drill pads impacts the safety of operations.
- Application of the condition would require a 24 m spacing between priority species to allow sufficient room for buffer requirements and a 4 m wide exploration track. This may result in an increase in clearing to meet the buffer requirements as Premier may not be able to use direct routes or parts of existing disturbed areas to access drill pads.
- The resulting increase in the clearing of native vegetation to meet the 10 m buffer requirement would potentially be at variance with Condition 8, which requires the avoidance and minimisation of clearing of native vegetation.
- Impacts to priority species are effectively avoided by amended Condition 12(d)(ii), which prevents clearing of any priority flora without the permission of the CEO.

6.7 **Condition 13a: Fauna Management (chuditch)**

6.7.1 **Current Condition**

Condition 13a is:

- *Up to one week prior to undertaking clearing of any of the area cross-hatched yellow in Figure 1 of Schedule 1, that area shall be inspected by a **fauna specialist** to identify chuditch (*Dasyurus geoffroii*) dens and individuals.*

6.7.2 **Existing Condition Requirements and Justification**

Reasons for this condition are provided in Section 3.2.2. of the Decision Report, which is relevant to the following clearing principle:

- Principle 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.

Potential impacts to chuditch and chuditch habitat are discussed in Section 3.2.2. of the Decision Report in paragraphs 4 and 5 on page 5. This includes the importance of den sites and that although no evidence of chuditch was found in fauna surveys, they are likely to occur as there is suitable denning and foraging habitat in parts of the Permit area. Fauna management conditions are required for *pre-clearing inspection for dens, relocation of individuals occupying identified dens, and replacement/relocation of confirmed dens in adjoining habitat.*

The recommended condition on page 5 is:

- *Fauna management (chuditch denning habitat) – if clearing is to occur between August and December, that area shall be inspected by a fauna specialist to identify chuditch (Dasyurus geoffroii) dens and individuals.*

Table 2 of CPS 9654/1 defines a fauna specialist as someone with:

- A tertiary qualification in environmental science or equivalent.
- A minimum of 2 years work experience in fauna identification and surveys of fauna native to the region being inspected or surveyed.
- A valid fauna licence issued under the *Biodiversity Conservation Act 2016*.

Condition 13(a) requires the person undertaking the chuditch inspection has a fauna licence, although the purpose of the inspection is to identify whether dens or individuals are present and handling and relocation of chuditch are not required for this purpose.

The area cross hatched yellow in Figure 1 of CPS 9654/1 is the entire Permit Area including habitat types where no chuditch habitat is present and areas of pine plantation where the clearing provisions of the EP Act do not apply.

6.7.3 ***Desired Amendment***

Premier desires two amendments to this condition:

- Up to one week prior to undertaking clearing of any of the area cross-hatched yellow in Figure 1 of Schedule 1, that area shall be inspected by an **environmental specialist** to identify chuditch (*Dasyurus geoffroii*) dens and individuals.
- A reduction in the area where inspections are required to only include habitats where the clearing provisions of the EP Act apply and chuditch denning habitat may be present. These areas are shown in Figure 6-3 and spatial data have been included in Attachment 6.

6.7.4 ***Justification for Amendment***

Premier agrees that chuditch inspections are required to prevent impacts to individuals and denning habitat where there are likely to be dens present, however the person undertaking the inspection should not require a fauna licence. The inspections should also not be required in areas which have been assessed as unlikely to have denning habitat.

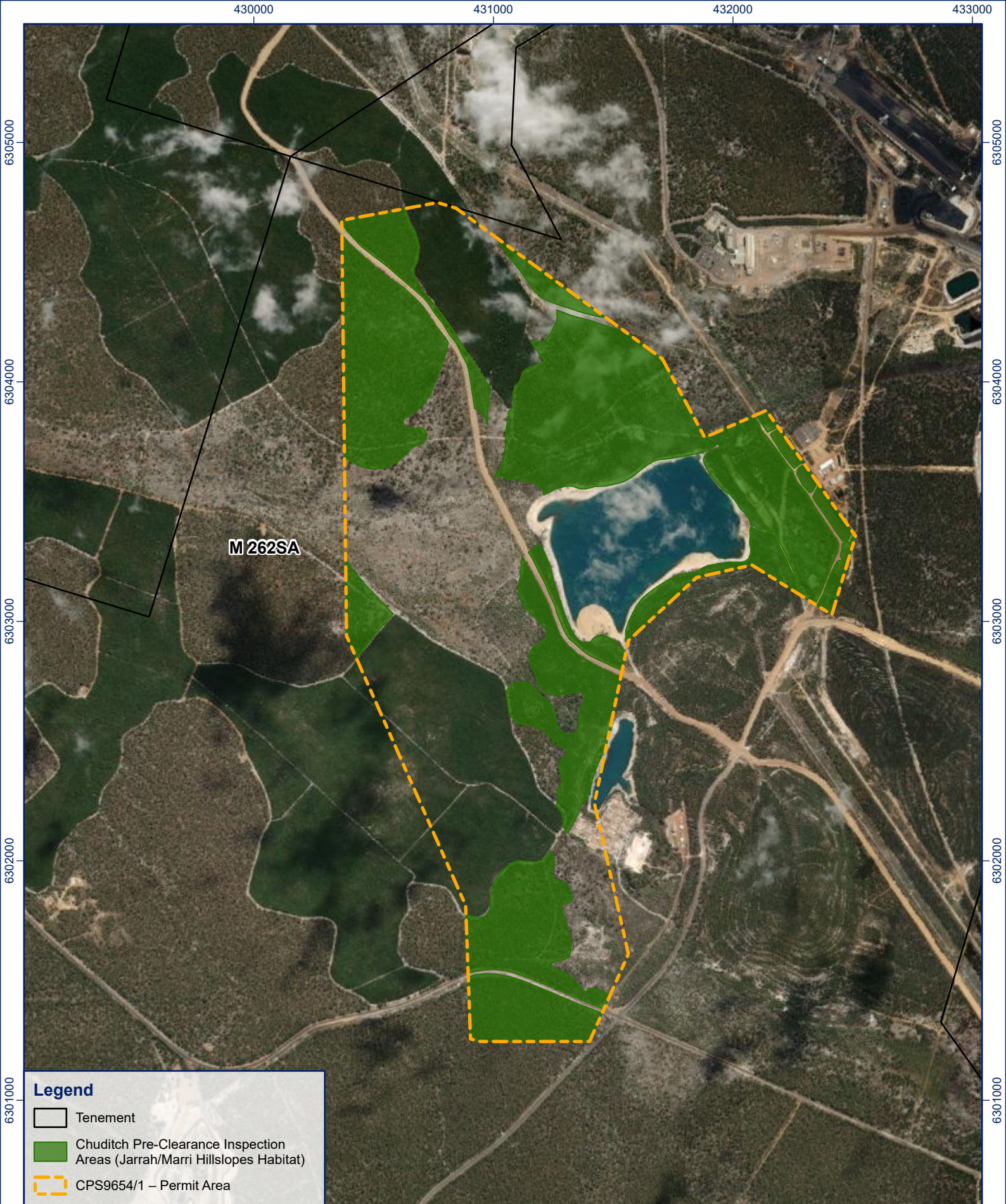
Premier considers that amending this condition to allow inspections by an Environmental Specialist instead of a Fauna Specialist is not at variance with Clearing Principle B as:

- The BC Act only requires fauna licences for the handling and relocation of native fauna. A condition that requires the person undertaking the chuditch inspection to have a fauna licence goes beyond the requirements of the BC Act and is not warranted.

- Most clearing areas are unlikely to have chuditch dens. In almost all circumstances where a chuditch den is found, the drill site can be moved and disturbance to the den avoided. Only in exceptional circumstances will relocation of the drill site be unavoidable, and a fauna licence required to disturb the den to determine whether chuditch are present; and to relocate any chuditch found.
- Exploration drill targets evolve throughout a drilling campaign and frequently change as results become available. The availability of experienced contractors with fauna licences is a real and practical constraint that may cause delays to drilling, including in the majority of clearing areas where no chuditch dens are present.
- Premier agrees that pre-clearance surveys should be undertaken by suitably experienced and qualified personnel. An environmental specialist as defined in Table 2 of CPS 9654/1 captures sufficient experience and qualifications and must be someone with:
 - A tertiary qualification in environmental science or equivalent.
 - experience relevant to the type of environmental advice that an environmental specialist is required to provide under this Permit.
- The desired environmental outcome of Condition 13 is to ensure that chuditch and chuditch denning habitat are identified prior to clearing so that impacts can be avoided. A chuditch inspection undertaken by an environmental specialist is just as effective at protecting and maintaining chuditch habitat in accordance with Clearing Principle B as a chuditch inspection by a fauna specialist.
- Amending this condition would in no way limit Premier's legal responsibility under the BC Act to engage a licenced fauna specialist should relocation be required. Premier has noted and agrees with the requirement in Condition 13(b)(ii) that a fauna specialist is required for relocation.

Premier considers that amending the area where pre-clearance inspections are required for chuditch to be restricted to Jarrah/Marri Forest on Hillslopes habitat only is not at variance with Clearing Principle B as:


- According to the Fauna Survey Report (OE 2022b, page 31), denning habitat for the chuditch is only expected to occur in the Jarrah/Marri Forest on Hillslopes habitat type.
- chuditch denning habitat can be maintained in accordance with Clearing Principle B if chuditch inspections are only undertaken in Jarrah/Marri Forest on Hillslopes Habitat.
- There is no additional environmental or conservation benefit associated with pre-clearance inspections in other habitat types present, as these vegetation types are either poor chuditch habitat or no dens have previously been recorded.
- The clearing provisions of the EP Act do not apply to pine plantation habitat, which is also unsuitable for chuditch.



Scale: 1:20,000
Projection: GDA2020 MGA Zone 50
Created/Reviewed By: HC/CR
Aerial: Esri, DigitalGlobe, GeoEye, i-cubed, USDA FSA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

0 250 500 m

RPMGLOBAL

PROJECT			CLIENT
Premier Coal - Collie			
Areas Requiring Pre-clearance Chuditch Inspections			
Figure 6-3	ADV-AU-000380	January 2023	

6.8 Condition 15(2): Habitat Tree GPS Recording

6.8.1 *Current Condition*

Condition 15(2) currently states:

- *In relation to habitat tree management pursuant with Condition 7 of this permit, the name and location of each habitat tree, recorded using Global Positioning System (GPS) unit set to Geocentric Datum Australia 1994 (GDA94), expressing the geographical coordinates in Eastings and Northings, in accordance with Condition 6.*

6.8.2 *Existing Condition Requirements and Justification*

Condition 15 details the record keeping requirements of the permit. These are not discussed in the Decision Report.

Condition 15(2) requires Premier to record the individual GPS co-ordinates of habitat trees in the Jarrah Forest. The application of the condition is not clear – as Condition 7 precludes Premier from clearing habitat trees, it could mean:

- Every tree not cleared in the Permit area needs to be individually recorded.
- No habitat trees need to be recorded as none are cleared.
- Habitat trees near clearing areas should be recorded.

6.8.3 *Desired Amendment*

The desired amendment is to clarify that habitat trees only need to be recorded inside clearing areas and to correct the reference to Condition 6:

- In relation to habitat tree management pursuant with Condition 7 of this permit, the name and location of each habitat tree inside clearing areas, recorded using Global Positioning System (GPS) unit set to Geocentric Datum Australia 1994 (GDA94), expressing the geographical coordinates in Eastings and Northings, in accordance with Condition 7.

6.8.4 *Justification for Amendment*

Premier considers this amendment is not at variance with Clearing Principle B as:

- The condition relates to record-keeping only and does not influence any environmental outcomes.
- Where tree hollows were encountered in the fauna survey (OE 2022b), GPS co-ordinates were recorded. In line with accepted practice, individual habitat trees were not recorded across the survey area, however habitat tree density was estimated based on the number of habitat trees present in 50 m x 50 m quadrats.
- Table A2 (page 28) of the Referral Guideline for 3 WA Threatened Black Cockatoo Species (Commonwealth of Australia 2022) states that an estimated number and location of potential nesting trees is required in the assessment and approval stage for impacts to breeding habitat. Habitat tree density is an accepted method for determining state and federal offsets that would be required if Premier was proposing to clear habitat trees. As Premier is not clearing any habitat trees, reporting requirements should not be more onerous than approvals in which clearing of habitat trees is granted.
- Condition 7 prevents the clearing of habitat trees. As no habitat trees will be cleared, habitat tree density in the Permit area will not change.

7 PROPOSED CORRECTIONS

There are two minor editing errors in CPS9654/1. These are summarised in Table 7-1.

TABLE 7-1: CORRECTIONS TO CPS9654/1

Condition	Potential Error	Proposed Correction
15(2)(a)	Condition states in accordance with Condition 6.	This should state in accordance with Condition 7. *This correction is also noted in Section 6.8.3.
15(4)	List in right column of table ends with (a).	List should end with (i).

8 ASSESSMENT OF CLEARING PRINCIPLES

Clearing applications are assessed against 10 principles listed Schedule 5 of the EP Act. An assessment of the proposed amendments against these principles is provided in Table 8-1. As this is an amendment application, the left three columns of Table 8-1 show DMIRS' assessment of the original NVCP application in the Decision Report. The right two columns provide an assessment after all amended clearing conditions have been applied.

TABLE 8-1: ASSESSMENT OF PROPOSED AMENDMENTS AGAINST CLEARING PRINCIPLES

Original CPS9654/1			Assessment of amendment	
Assessment against the clearing principles	Variance level	Is further consideration required?	Assessment	Variance Level
<p>Principle (a): “Native vegetation should not be cleared if it comprises a high level of biodiversity.”</p> <p>Assessment:</p> <p>The area proposed to be cleared is situated within the Collie State Forest; contains foraging and potential breeding habitat for Threatened and Priority fauna species; may contain suitable habitat for Threatened flora and contains two Priority flora species (OE 2022a; OE 2022b; GIS Database).</p>	At variance	Yes	<p>Detailed flora survey of Permit area has been undertaken:</p> <ul style="list-style-type: none"> No TECs or PECs were identified. No threatened species were identified. Two priority 4 species were identified. 13 Vegetation types identified in Permit area are not restricted and are regionally common. <p>Amended Conditions prevent impacts to biodiversity:</p> <ul style="list-style-type: none"> Condition 8 requires the minimisation of clearing. Condition 9 requires weed and dieback prevention and management. Condition 10 requires the implementation of a dieback management plan. Condition 12 requires targeted survey of clearing areas in two years prior to any clearing and prevents clearing of threatened and priority species. Condition 14 requires rehabilitation and subsequent monitoring of areas no longer required. <p>With the above conditions in place, the proposed activities are unlikely to be at variance with this principle.</p>	Not likely to be at variance

Original CPS9654/1			Assessment of amendment	
Assessment against the clearing principles	Variance level	Is further consideration required?	Assessment	Variance Level
<p>Principle (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.”</p> <p><u>Assessment:</u></p> <p>The area proposed to be cleared contains foraging and potential breeding habitat for conservation significant fauna (OE 2022b).</p>	At variance	Yes	<p>Fauna survey has been undertaken in Permit area, which hosts habitat for threatened and priority species, however habitat types in the Permit area are regionally common and are not restricted.</p> <p>Amended Conditions prevent impacts to fauna and fauna habitat:</p> <ul style="list-style-type: none"> • Condition 7 prevents the clearing of habitat trees. • Condition 8 requires the minimisation of clearing. • Condition 9 requires weed and dieback prevention and management. • Condition 10 requires the implementation of a dieback management plan. • Condition 13 requires pre-clearance inspections for chuditch; the relocation of chuditch from clearing areas and the replacement of any dens destroyed. • Condition 14 requires rehabilitation and subsequent monitoring of areas no longer required. <p>With the above conditions in place, the proposed activities are unlikely to be at variance with this principle.</p>	Not likely to be at variance

Original CPS9654/1			Assessment of amendment	
Assessment against the clearing principles	Variance level	Is further consideration required?	Assessment	Variance Level
<p>Principle (c): “Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora.”</p> <p><u>Assessment:</u></p> <p>The area proposed to be cleared may contain habitat for flora species listed under the BC Act (OE 2022a).</p>	May be at variance	Yes	<p>Detailed flora survey of Permit area has been undertaken:</p> <ul style="list-style-type: none"> No TECs or PECs were identified. No threatened species were identified. Two priority 4 species were identified. 13 Vegetation types identified in Permit area are not restricted and are regionally common. <p>Amended condition 12:</p> <ul style="list-style-type: none"> Requires targeted survey of clearing areas in two years prior to any clearing. Prevents clearing within 50 m of any threatened flora that may be identified in future. Prevents clearing of priority species without the permission of the CEO. <p>Condition 14 requires rehabilitation and monitoring of areas no longer required.</p> <p>As no threatened flora have been identified during two-season detailed survey and clearing permit conditions require targeted survey for threatened flora in clearing areas, the proposed activity is unlikely to impact any threatened species.</p>	Not likely to be at variance
<p>Principle (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.”</p> <p><u>Assessment:</u></p> <p>The area proposed to be cleared does not contain species that can indicate a threatened ecological community (OE 2022b; GIS Database).</p>	Not likely to be at variance	No	No change – No TECs have been identified in the Permit area.	

Original CPS9654/1			Assessment of amendment	
Assessment against the clearing principles	Variance level	Is further consideration required?	Assessment	Variance Level
<p>Principle (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.”</p> <p>Assessment:</p> <p>The application area occurs within the Jarrah Forrest Interim Biogeographic Regionalisation of Australia (IBRA) bioregion, in which approximately 53.25% of the pre-European vegetation remains (GIS Database; Government of Western Australia 2019).</p> <p>The vegetation within the application area has been mapped as Beard vegetation association 3 (GIS Database; OE 2022a). This vegetation association is well represented at both a state and bioregional level (>60% pre-European extent remaining) (Government of Western Australia 2019). Given the amount of vegetation remaining in the local area and bioregion, the vegetation proposed to be cleared is not considered to represent remnant vegetation.</p>	Not likely to be at variance	No	No Change – All 13 vegetation types identified in the Permit area are well represented beyond the permit area (OE 2022a, page ii).	

Original CPS9654/1			Assessment of amendment	
Assessment against the clearing principles	Variance level	Is further consideration required?	Assessment	Variance Level
<p>Principle (f): “Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.”</p> <p><u>Assessment:</u></p> <p>There are no permanent watercourses or wetlands within the area proposed to clear (GIS Database). There are three ephemeral watercourses within the application area, however there has been no riparian vegetation identified within the application area (GIS Database; OE 2022a).</p> <p>Given there are no permanent watercourses or wetlands and associated riparian vegetation recorded within the application area, the proposed clearing is unlikely to impact on native vegetation growing in, or in association with, a watercourse or wetland.</p>	Not likely to be at variance	No	No change.	

Original CPS9654/1			Assessment of amendment	
Assessment against the clearing principles	Variance level	Is further consideration required?	Assessment	Variance Level
<p>Principle (g): “Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.”</p> <p>Assessment:</p> <p>The mapped soils are considered moderately susceptible to wind or water erosion and nutrient export. To minimise potential land degradation in the form of erosion, a staged clearing condition has been applied to the permit.</p> <p>Condition:</p> <p>The Permit Holder shall not clear native vegetation unless the purpose for which the clearing is authorised is enacted within 6 months of the authorised clearing being undertaken.</p>	May be at variance	No	No change.	
<p>Principle (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 area.”</p> <p>Assessment:</p> <p>The application area is situated within the Collie State Forest (GIS Database). The Collie State Forest is managed by the Department of Biodiversity, Conservation and Attractions.</p>	May be at variance	Yes	No change	

Original CPS9654/1			Assessment of amendment	
Assessment against the clearing principles	Variance level	Is further consideration required?	Assessment	Variance Level
<p>Principle (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.”</p> <p><u>Assessment:</u></p> <p>The application area is within a Country Areas Water Supply Area (GIS Database), however the majority of the application area is within the low salinity risk Zone D and is unlikely to impact on groundwater quality provided rehabilitation is enacted at the end of each drilling program (which has been applied to this permit) (DWER 2022; GIS Database).</p> <p>The Collie River South (a major river) is located approximately 4 kilometres south east of the application area and there are several ephemeral drainage lines within the application area that link to the Collie River South (GIS Database), there is a potential to impact on the quality of surface water during periods of high rainfall. As such, a watercourse condition is required to manage potential surface water quality impacts.</p> <p><u>Condition:</u></p> <p>Vegetation management (watercourse and drainage line surface flow) - The permit holder is to maintain existing watercourse and drainage line flows.</p>	May be at variance	No	No change.	

Original CPS9654/1			Assessment of amendment	
Assessment against the clearing principles	Variance level	Is further consideration required?	Assessment	Variance Level
<p>Principle (j): “Native vegetation should not be cleared if the clearing of the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.”</p> <p>Assessment:</p> <p>There are two water filled mining voids within the application area, which may cause flooding in periods of high rainfall. Overflow of these voids are predicated to flow to lower elevations, where ephemeral drainage lines occur and may cause of exacerbate the incidence of flooding. As such, a surface water flow condition is required to minimise the likelihood of flooding or water logging.</p> <p><u>Condition:</u></p> <p>Where a watercourse or drainage line is to be impacted by clearing, the Permit Holder shall ensure that the existing surface flow is maintained.</p>	May be at variance	No	No change.	

9 REFERENCES

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