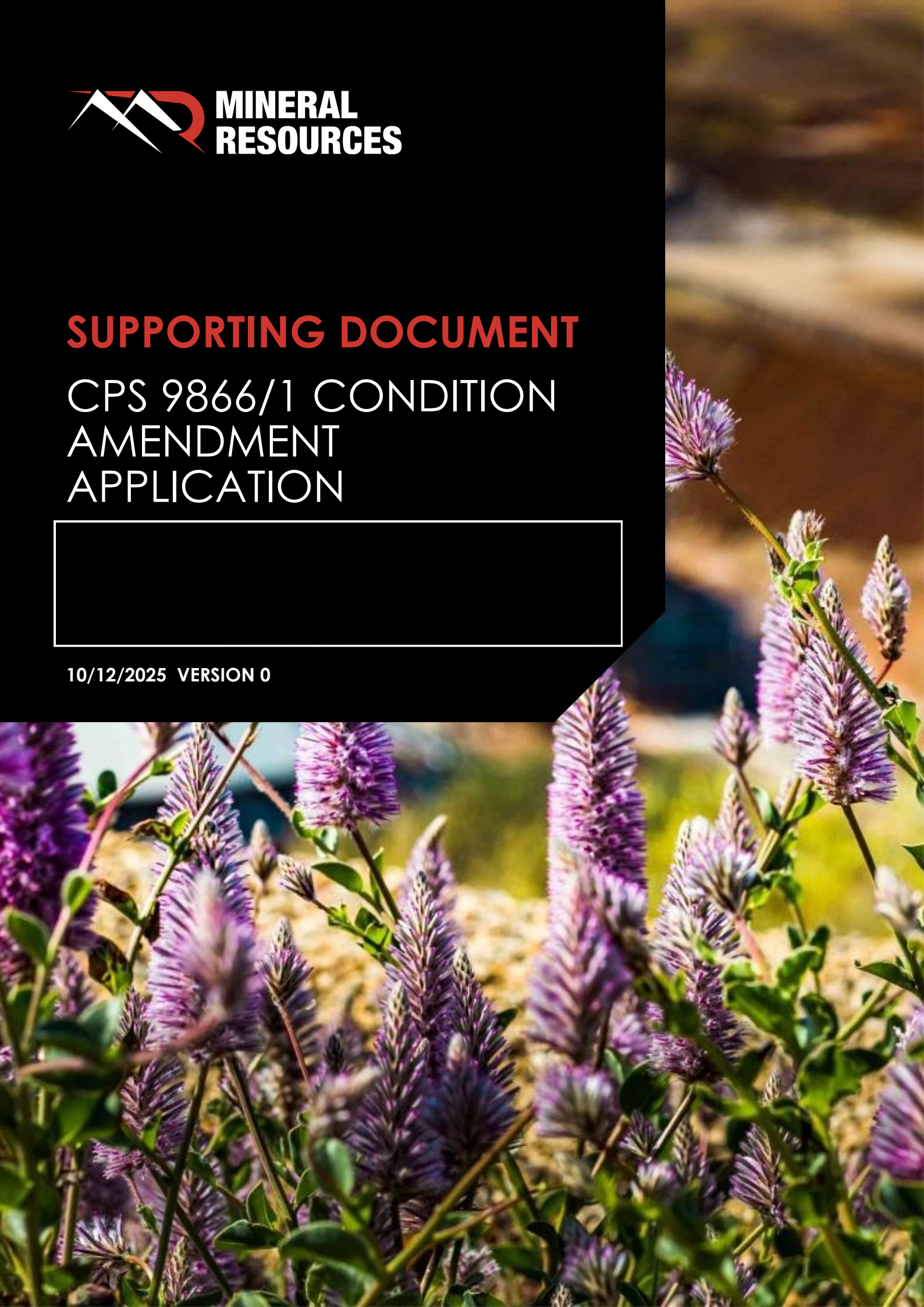
MINERAL RESOURCES

SUPPORTING DOCUMENT

CPS 9866/1 CONDITION AMENDMENT APPLICATION

10/12/2025 VERSION 0



DOCUMENT INFORMATION

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Version	**Issue Date**	**Prepared by**	**Reviewed By**	**Approved By**	**Document Purpose**
0	10/12/2025	A.Cavanagh	A.Cross D. Hodges	J.Cookson	Conditional Amendment Application for CPS 9866/1

Approvals			
Version	**Date**	**Comments**	**Approved by**
0	23/09/2023	CPS 9866/1 Approved	Department of Water and Environmental Regulation

Acknowledgement of Country

MinRes is committed to reconciliation and recognises and respects the significance of Aboriginal and Torres Strait Islander peoples' communities, cultures, and histories. MinRes acknowledges and respects Aboriginal and Torres Strait Islander peoples as the traditional custodians of the land.

EXECUTIVE SUMMARY

Process Minerals International Pty Ltd (PMI), a wholly owned subsidiary of Mineral Resources Limited (MinRes), is seeking amendment to the conditions of Native Vegetation Clearing Permit (NVCP) Purpose Permit CPS 9866/1 for the Mt Marion Lithium Project.

The Purpose Permit allows for the clearing of 120 ha of native vegetation within [redacted] The Mt Marion Lithium Project currently operates under several NVCP Purpose Permits for exploration and mining operations.

The objective of this Application is to remove conditions of the licence in consideration of updated threatened and priority flora information published by Department of Biodiversity, Conservation and Attractions (DBCA) and further short-range endemic (SRE) species survey information conducted for the Mt Marion site.

There are no proposed changes to the clearing limit or boundary approved under the current purpose permit.

The following amendments to Purpose Permit CPS 9866 are requested:

- Removal of conditions that reference species *Eremophila acutifolia*. This species has been delisted from the Western Australia DBCA Priority List due to the identification of large populations, meaning it no longer met the criteria for threatened or priority status.
- Removal of conditions relating to the management of Trapdoor spiders (*Idiosoma sp.)*. Further studies by Bennelongia (2025) have identified that the species found at Mt Marion are not part of the nigrum complex and are therefore not shield-backed trapdoor spiders.

A summary of the proposed changes to the conditions are provided in **Table ES-1.**

Table ES-1: Summary of propsoed conditional changes

Condition Reference	Condition Text	Proposed Action
9	Prior to undertaking any clearing authorised under this Permit, the Permit Holder shall: i. Demarcate the area to be cleared; ii. Any *Eremophila acutifolia* individuals within the area demarcated under condition 9(a), shall be flagged for avoidance, where practical.	MinRes requests that Condition 9 be removed due to the delisting of the species it references (*Eremophila acutifolia*).
10(a)	Prior to undertaking any clearing authorised under this permit, the permit holder shall engage a fauna specialist to undertake clearance surveys within the areas cross-hatched yellow on Figure 1 of Schedule 1 for Shield-backed trapdoor spiders (*Idiosoma sp.*) and Malleefowl (*Leipoa ocellata*), including the identification and inspection of burrows and active and inactive mounds.	MinRes requests that text in Condition 10(a)(b)(c) relating to *Idiosoma sp.* be removed.
10(b)	The Shield-backed trapdoor spider and Malleefowl pre-clearance survey should also include searches for other conservation significant fauna.	MinRes requests that text in Condition 10(a)(b)(c) relating to *Idiosoma sp.* be removed.
10(c)	Where the burrows and mounds are identified under condition 10(a) of this permit, the permit holder shall; i) Flag the location of the burrow(s) and mound(s); ii) Not clear within 50m of a single shield-backed trapdoor spider burrow(s);	MinRes requests that text in Condition 10(a)(b)(c) relating to *Idiosoma sp.* be removed.

Condition Reference	Condition Text	Proposed Action
	iii) Not clear within 200m of matriarchal clusters of Shield-backed trapdoor spider burrows(s) iv) Not clear within 50m of Malleefowl mound(s).	
12	Ensure no clearing occurs within the area cross-hatched red in Figure 2A and 2B of Schedule 2 of this Permit unless first approved by the CEO.	MinRes requests that Condition 12 be removed.

A re-assessment of the ten clearing principles was undertaken, and in summary, the proposed clearing under permit CPS9866/1 is not likely to be at variance with any of the Clearing Principles as per the initial assessment.

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1. INTRODUCTION

Process Minerals International Pty Ltd (PMI), a wholly owned subsidiary of Mineral Resources Limited (MinRes), is seeking amendment to the conditions of Native Vegetation Clearing Permit (NVCP) Purpose Permit CPS 9866/1 for the Mt Marion Lithium Project.

The Purpose Permit allows for the clearing of 120 ha of native vegetation [redacted] The Mt Marion Lithium Project currently operates under several NVCP Purpose Permits for exploration and mining operations.

To date, approximately 1,005 hectares (ha) has been disturbed under multiple clearing permits and other instruments at the Mt Marion Lithium project (**Table 1**). Approximately 1.17 ha has been cleared under permit CPS9866/1.

The objective of this Application is to remove conditions of the licence in consideration of updated threatened and priority flora information published by Department of Biodiversity, Conservation and Attractions (DBCA) and further short-range endemic (SRE) species survey information conducted for the Mt Marion site. It is requested that the instrument (CPS 9866/1) be updated with consideration of the updated information. **There are no proposed changes to the clearing limit or boundary approved under the current purpose permit.**

Environmental values, including a summary of supporting biological surveys completed to support this application, are provided in Sections 3 and 4. An assessment of the proposed clearing against the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* Clearing Principals has been updated from the initial submission, which considers the key surrounding environmental characteristics and analysis of the relevant supporting biological surveys (Section 6).

1.1 PROPONENT

MinRes operates the Project under a Build-Own-Operate life of mine Mining Services Contract. The Project is jointly owned by MinRes (50%) via its subsidiary Process Minerals International (PMI) and one of the world's largest lithium producers, Gangfeng Lithium Co. Ltd (50%). The joint venture Proponent is named Mt Marion Lithium Management Pty Ltd.

1.2 PERMIT HISTORY

A summary of historical NVCP applicable to the Mt Marion Project under MinRes and PMI are detailed in **Table 1**.

Table 1: NVCP Application History

Permit – CPS Reference	Issued	Expiry	Allocation (ha)	Cleared Total (ha) under permit
9866/1	23/09/2024	23/09/2033	120	1.17
3549/1	24/07/2010	31/03/2014	150	102.33
5245/2	09/01/2013	17/11/2022	200	1.89
6770/1	05/11/2015	28/11/2020	292.23	400.76
6770/2	21/07/2016	28/11/2025	450	
8632/1	13/12/2019	12/01/2030	600	497.09
8632/2	04/05/2023	12/01/2030		

Permit – CPS Reference	Issued	Expiry	Allocation (ha)	Cleared Total (ha) under permit
8632/3	13/12/2023	12/01/2030		
9518/1	25/11/2022	25/11/2034	200	0
10813/1	18/06/2025	18/05/2035	302	1.84
Total Cleared Under MinRes Permits				1,005.08

1.3 LEGISLATIVE FRAMEWORK

The clearing of native vegetation in Western Australia is regulated under Part V of the *Environmental Protection Act 1986* (EP Act) and the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004*. In addition to the matters considered in accordance with section 51O of the EP Act, MinRes also has regard to the following statutes, polices and guidelines:

Legislation of relevance for assessment of native vegetation clearing:

- *Biodiversity Conservation Act 2016* (WA) (BC Act)
- *Conservation and Land Management Act 1984* (WA) (CALM Act)
- *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act)
- *Planning and Development Act 2005*
- *Soil and Land Conservation Act 1945*
- *Rights in Water and Irrigation Act 1914*
- *Aboriginal Heritage Act 1972.*

Other policies and guidance relevant to the Project include:

- Environmental Offsets Policy (Government of Western Australia, 2011)
- A guide to the assessment of applications to clear native vegetation (Department of Environmental Regulation, 2014)
- Procedure: Native vegetation clearing permits (Department of Water and Environmental Regulation, 2021)
- Technical guidance – Flora and Vegetation Surveys for Environmental Impact Assessment (Environmental Protection Authority, 2016)
- Technical guidance – Terrestrial Vertebrate Fauna Surveys for Environmental Impact Assessment (Environmental Protection Authority, 2020) Approved Recovery Plans for threatened species.

Currently the Mt Marion Project operates under the approvals outlined in **Table 2.**

Table 2: Existing Approvals for Mt Marion

Process	Instrument	Approval Authority	Relevant Legislation
Mt Marion Site-wide Mining Proposal	Reg ID 129825	Department of Mines, Petroleum and Exploration	*Mining Act 1978*
Mt Marion Site-wide Mine Closure Plan			

Process	Instrument	Approval Authority	Relevant Legislation
Development Approvals	PA24/08, PA24/03, PA23/13, PA22/08, PA12/2019	Shire of Coolgardie	*Planning and Development Act 2005*
NVCP – Multiple Clearing Permits Currently Held	As per Table 1	Department of Water and Environmental Regulation	Part V Division 2 of the EP Act 1986
Section 26D and 5C licence to construct bores and abstract groundwater	GWL174427, GWL200665. Multiple 26D	Department of Water and Environmental Regulation	*Rights in Water and Irrigation Act 1914*
Prescribed Premises Licence	L9037/2017/1	Department of Water and Environmental Regulation	Part V of the EP Act 1986

1.4 STAKEHOLDER CONSULTATION AND OTHER PLANNING MATTERS

MinRes recognises the value of building positive relationships with key stakeholders and the communities in which it is active. It seeks to engage early, openly, honestly and regularly with the communities impacted by its operations and consider their views in its decision-making with respect to key planning, operational and closure aspects.

A wide variety of stakeholders have been identified within the Purpose Permit Area and include:

- Pastoral Lease Holders
- Native Title Groups
- Other Mining Tenement Holders
- Other Stakeholders (surface rights)
- Statutory Authorities, Government, Business and Community Bodies.

Early consultation regarding the Project has occurred and is ongoing with both the Department of Mines, Petroleum and Exploration (DMPE) and the Shire of Coolgardie. The Purpose Permit Area lies wholly within the Marlinyu Ghoorlie (WC2017/007) Native Title determination.

2. PROJECT DESCRIPTION

2.1 PURPOSE AND METHODOLOGY

The purpose of Purpose Permit CPS 9866/1 is for the clearing of native vegetation as required for mineral exploration activities. The purpose of the permit, and the methods for undertaking clearing, are not proposed to be changed.

2.2 DESCRIPTION OF PROPOSED ACTIVITIES

Purpose Permit CPS 9866/1 allows for 120 ha of proposed clearing within a total boundary of 1,310.67 ha. The approved Permit Area is presented in **Figure 1**.

There are no proposed changes to the clearing limit or boundary approved under the current purpose permit.

2.3 REGIONAL SETTING

The Purpose Permit Area is located within the Coolgardie Botanical District of the Southwestern Interzone. This botanical district is predominantly Eucalypt woodland, becoming open towards the more calcareous soils, where a cover of saltbush-bluebush is evident. The landscape is gently undulating consisting of a deeply weathered surface, dry creeks, and low hills with areas of low elevation consisting of salt lakes and dunes.

2.4 TENURE AND LAND ACCESS

The underlying tenure is [redacted]

Table 3: Land Tenure

Property	Polygon Identification No.	Certificate of Title	Ownership

Figure 1: NVCP CPS9866/1 Permit Area

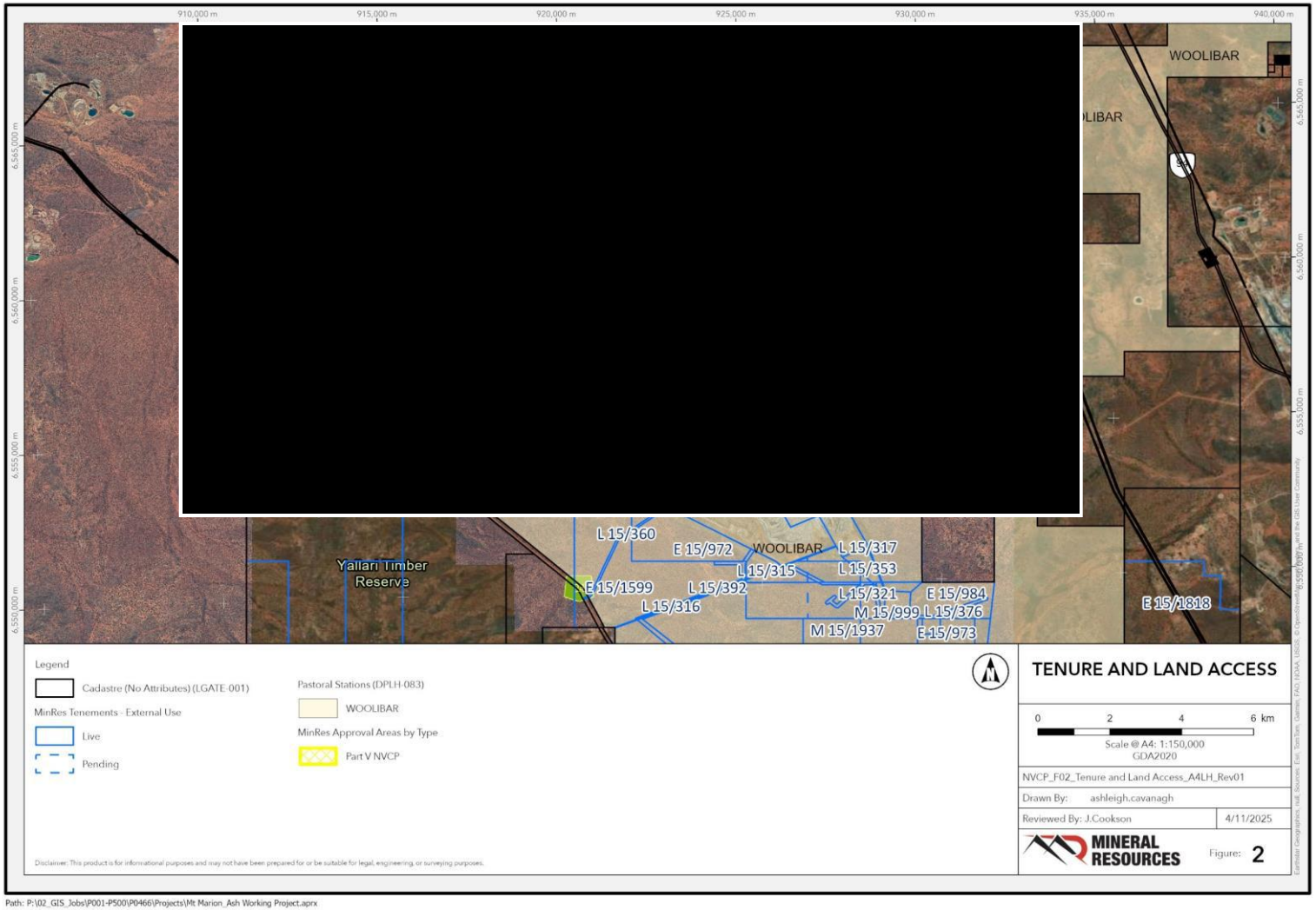

Figure 2: Tenure and Land Access

2.5 PROXIMITY TO DBCA MANAGED LANDS

There are no direct intersections of the permit boundary with any DBCA managed lands. The closest two DBCA managed lands are the Karamindie Forest (200 m North) and Yallari Timber Reserve (50 m South). Kambalda Nature Reserve (13 km south-east), Kambalda Timber Reserve (15 km south-east) and Scahill Timber Reserve (25 km south-west) occur further from the permit boundary. All DBCA managed lands within the vicinity of the permit boundary are presented in **Figure 3**.

2.6 REGIONAL LAND USE

The Permit is located within the Goldfields region of Western Australia which consists predominantly of mining, prospecting, forestry and pastoralist land uses. The Goldfields Woodlands are described as having an exceptionally high diversity of Eucalyptus species, with as many as 170 species occurring within the bioregion (Cowan, 2001). The Permit lies within the Coolgardie Vegetation System. All woodlands in the Coolgardie System have been logged in the past for mining timber and firewood and current vegetation is secondary growth regenerated from seed and coppice (Beard, J.S. 1972).

The Permit area occurs partially within the Woolibar Pastoral Lease (**Figure 2**).

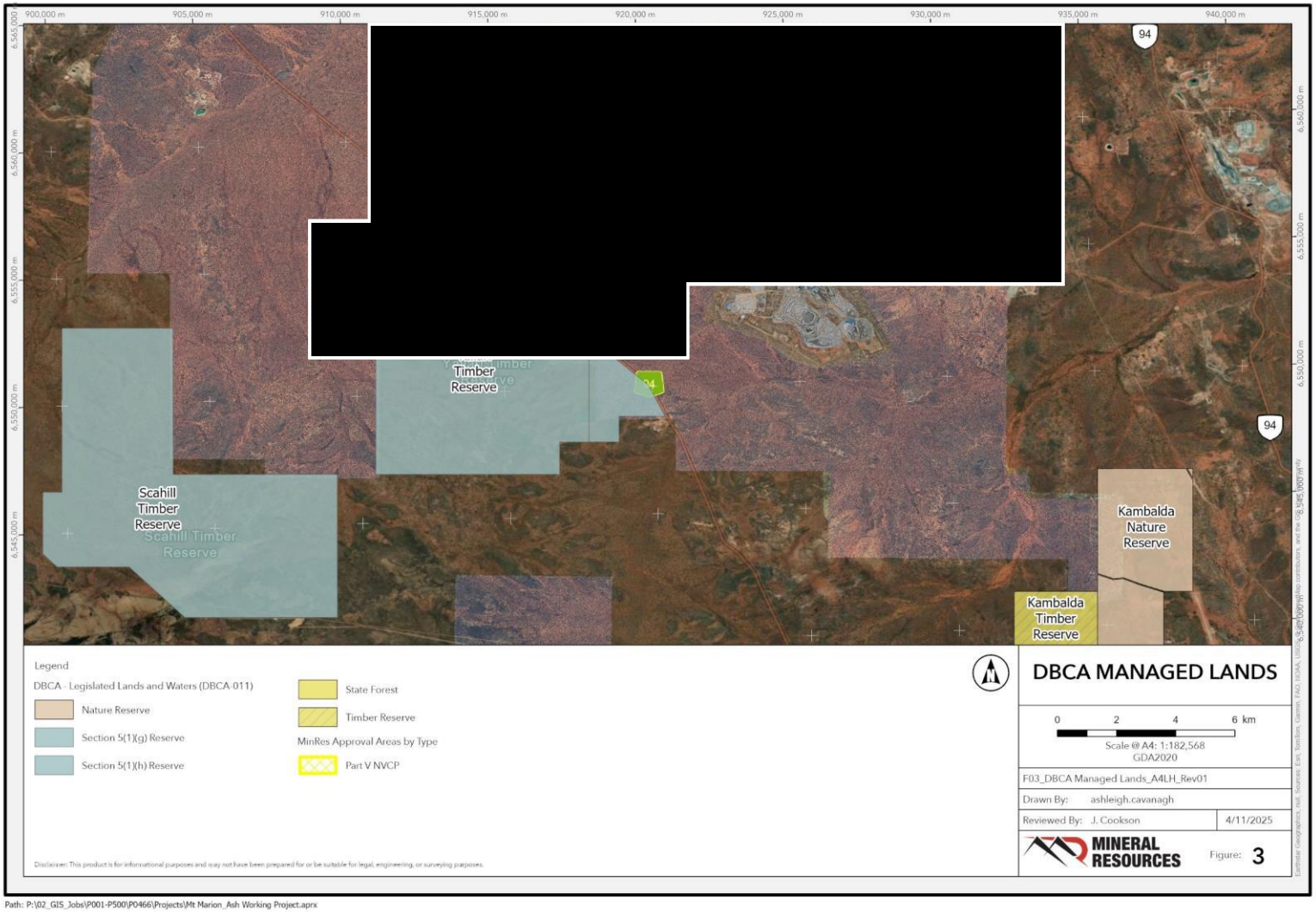

Figure 3: DBCA Managed Lands

3. PROPOSED CONDITION AMENDMENTS

3.1 FLORA MANAGEMENT CONDITION AMENDMENT

Condition 9 of the NVCP Permit document (CPS9866/1) states that for flora management, prior to undertaking any clearing authorised under the permit, the permit holder shall:

a) Demarcate the area to be cleared.

b) Any *Eremophila acutifolia* individuals within the area demarcated under condition 9(a), shall be flagged for avoidance, where practical.

The decision report for the permit considered the potential clearing of 1,581 individuals of *Eremophila acutifolia* (within the proposed clearing footprint) from a total number of 21,395 individuals identified. Given the abundance within the application area and broader region, the clearing of these individuals was not considered to represent a significant impact at a local or regional scale (approximately 7.39% of the local population).

At the time of the application being assessed, *Eremophila acutifolia* was a Priority 3 (P3) species. Definition of a P3 species is:

> *P3: Poorly-known species – known from several locations*
>
> *Species that are known from several locations and the species does not appear to be under imminent threat or from few but widespread locations with either large population size or significant remaining areas of apparently suitable habitat, much of it not under imminent threat.*
>
> *Species may be included if they are comparatively well known from several locations but do not meet adequacy of survey requirements and known threatening processes exist that could affect them. These species need further survey.* (DBCA, 2023)

Eremophila acutifolia was delisted after further fieldwork and population records were collected and considered within the species listing, determining populations were more widespread and stable than historically identified.

Due to the delisting of the species, it is proposed that Condition 9 be removed from the instrument as part of this amendment on the basis that the clearing within the footprint would not cause a significant impact at a local or regional scale to the *Eremophila acutifolia* populations and that the species has been delisted.

3.2 FAUNA MANAGEMENT CONDITION AMENDMENT

Multiple SRE assessments have been completed over the purpose permit area, including:

- Bamford 2022 – Basic Fauna Assessment (Including SRE) (Bamford Consulting Ecologists (BCE), 2022)(**Appendix C**)
- Bennelongia 2024 – Mt Marion Short Range Endemic Survey (Bennelongia, 2025)(**Appendix D**).

During the Bamford 2022 survey, specimens of *Idiosoma spp* were identified north of Mt Marion. Three specimens were collected for identification and all were unidentifiable species of the genus *Idiosoma spp,* with two juveniles and one adult female identified. Identification to a species level was not possible. The precautionary approach was taken, and it was considered possible that the collected specimens were individuals of either one or both of the expected priority-listed Shieldbacked Trapdoor Spider: the Coolgardie Shieldbacked Trapdoor Spider (*Idiosoma*

intermediumi) and/or the Central Eastern Wheatbelt Shield-backed Trapdoor Spider (*Idiosoma mcnamarai*).

Bennelongia were later engaged in 2024 to undertake a desktop assessment and detailed short-range endemic (SRE) survey within area of the Mt Marion Project and surrounds, which had been proposed for exploration and future mining infrastructure. The objectives of the scope were to:

- Characterise the regional SRE invertebrate community within a desktop Search Area
- Identify the occurrence of prospective SRE habitat in the Project and Survey Areas
- Identify confirmed or likely SRE species in the Project and Survey Areas and assess their conservation significance.

Nine broad habitats prospective for SRE Group species were identified within the Survey Area. The most abundant habitat is open Eucalypt woodland. Other widely dispersed but less prominent habitats include drainage lines, rocky hills and shrublands. The open woodlands, rocky hills and drainage lines are all characterised by a Eucalypt overstorey with a mid-storey consisting of sparse heathland including acacia and melaleuca. The rocky hills habitat, as well as occurring on sloped terrain, have protruding rocky areas of greenstone/granite/quartz providing shelter habitat. The shrublands consist of undulating plains of open to closed dense shrubland/heathland of *Melaleuca pauperiflora, Acacia acuminata, Hakea* spp., *Senna* spp., and *Eremophila* spp. with minimal ground cover. None of the broad habitat types were restricted to the Survey Area; rather they appear to be widespread at a regional scale.

Most of the habitat was already disturbed habitat due to clearance, reducing the potential for prospective habitat. Of the remaining area, there are three main habitats prospective for SREs:

- Open Eucalypt Woodland
- Drainage Line
- Rocky Hill

The field program, including hand foraging and dry trapping sampling targeting invertebrates belonging to SRE Groups, was carried out in 2024 over two rounds - thirty sites were sampled from 7th – 4th May and 31 sites were sampled from 15th - 22nd August. In total, 458 records of SRE Groups were recovered from both rounds of survey. This consisted of 642 specimens from at least 74 unique species, including:

- 15 species (20.3 %) were snails
- 19 species (25.7 %) were spiders
- Eight species (10.8 %) were pseudoscorpions
- 11 species (14.9 %) were centipedes, ten species were isopod slaters (13.5 %)
- Five species were scorpions (6.8 %)
- Six species (8.1 %) of millipedes.

Mapping these records onto habitat shows that SRE Group species were recovered from all 52 sample sites and, consequently, all nine habitat types.

The desktop assessment revealed a rich and diverse regional SRE Group community with representation from all seven non-worm groups, and habitat assessment suggested that habitats within the Survey Area are highly prospective for SRE Group species. Nonetheless, only a small proportion of species (two) were regarded as being likely SREs based on our classification system, as many species occupied diverse habitat types.

At least 74 unique species were collected from the survey and of the 72 species-level identifications, no species had confirmed SRE status, and there were no species that were conservation-listed. The breakdown of the SRE statuses of the species identified is as follows:

- Two Potential – Likely SRE
- 17 Potential – Unlikely SRE
- 14 Potential – Data Deficient SRE
- 40 were considered to be Widespread SRE.

The two Potential – Likely species are an isopod slater, *Buddelundia* `BIS554`, and a Bothriembryontid snail, *Bothriembryon* `BGA053`. *Buddelundia* `BIS554` is an isopod slater of family Armadillidae. Neither of the likely SRE species was found in the Project Area from the limited done at that location. *Buddelundia* `BIS554` occurred in patches of shrubland within eucalypt woodland and an open floodplain within a drainage line. *Bothriembryon* `BGA053` occurred in drainage line and floodplains where vegetation consisted of acacia mulga shrubs and eucalypt overstorey. These habitat types are not restricted to the Survey Area and so habitat prospective for the Potential – Likely SRE species extends beyond areas of proposed impact.

Bennelongia were asked to comment further on Mygalomorph spiders, in particular Idiosoma species with consideration of the condition on instrument CPS9866/1. There was an abundant and diverse community of Mygalomorph spiders at the Mt Marion Lithium Project. Of the 19 species collected in the current survey, none were considered to be Potential – Likely but five were considered to be Potential – Data Deficient, based on the low number of samples collected. These are Aname `BMYG244, Teyl`MYG012`, Idiommata sp. `kalgoorlie`, Conothele `MYG554` and Bungulla `BMYG251`. One group within mygalomorph spiders that has conservation significance is the shield-backed trapdoor spiders, i.e., species from the *Idiosoma nigrum* complex. **While three species from the Idiosoma genus were recovered from this survey (I. `BMYG168`, I. `BMYG249` and I. `MYG244`), both morphological and genetic analysis concluded they are not part of the nigrum complex and are therefore not shield-backed trapdoor spiders** (Bennelongia, 2025).

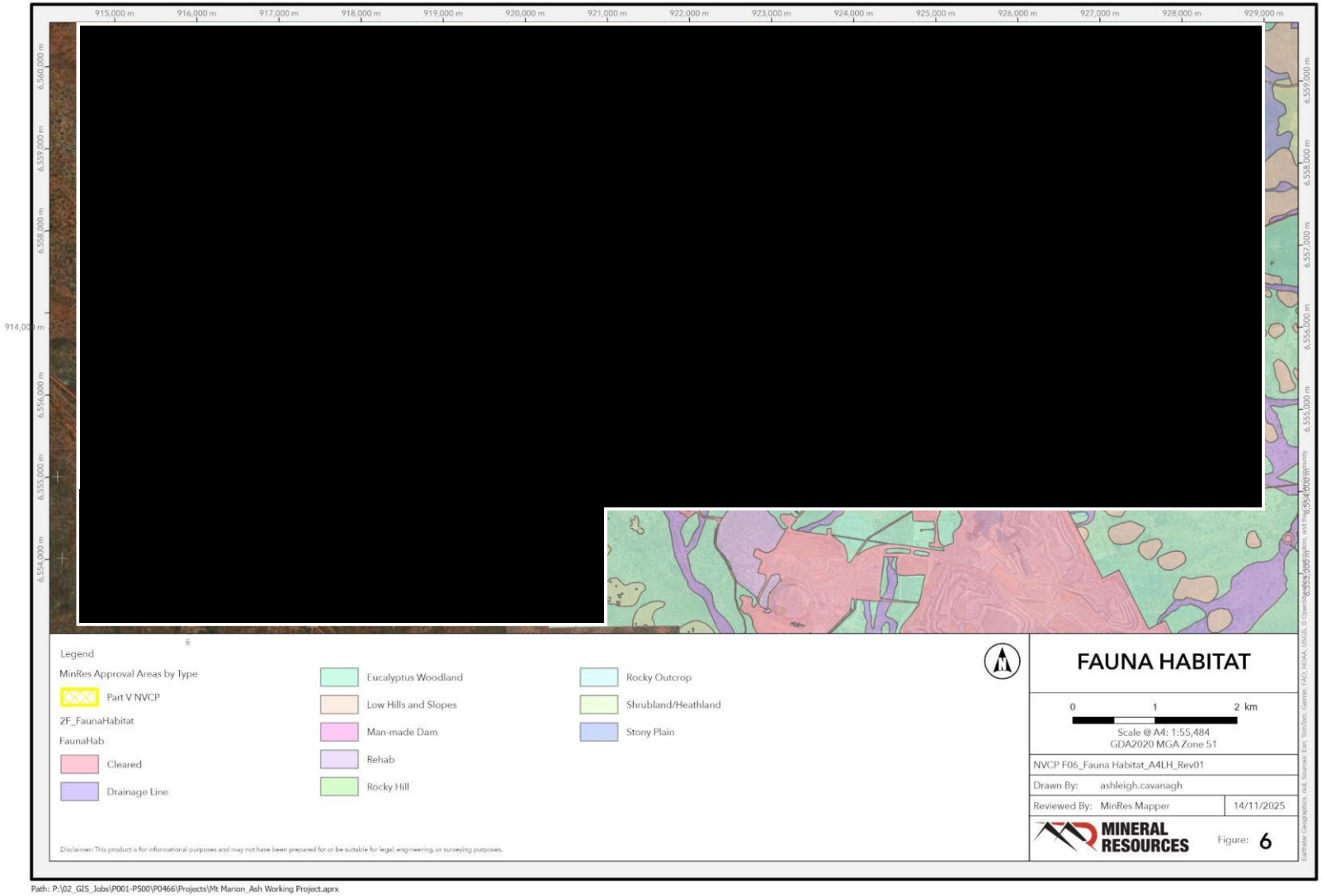

Figure 4: SRE Habitat (Bennelongia, 2025)

Figure 5: SRE Survey Footprint and Locations (Bennelongia, 2025)

There are several conditions listed within the current clearing permit (CPS9866/1) subject to fauna management that are proposed for amendment within this application, further justification on the amendments requested specific to the conditions are summarised in **Error! Reference source not found.**.

The fauna management pre-clearance conditions for CPS9866/1 have combined the requirements for both Malleefowl (*Leipoa ocellata*) and Shield-backed Trapdoor spiders (*Idiosoma sp*.). No changes are proposed to the Malleefowl conditions, and it is recognised that these pre-clearance activities will continue to be complied with when utilising the amended permit.

Table 4: Proposed Changes to CPS9866/1 Conditions

Condition Reference	Condition Text	Discussion/ Change Proposed	Proposed Action
Flora Management -			
9	Prior to undertaking any clearing authorised under this Permit, the Permit Holder shall: a) Demarcate the area to be cleared; b) Any *Eremophila acutifolia* individuals within the area demarcated under condition 9(a), shall be flagged for avoidance, where practical.	*Eremophila acutifolia* has been delisted from the priority species list due to the identification of additional populations no longer allowing the species to classify for the conditions of being considered within the priority species listing. Additionally, during the Permit assessment, it was determined that the removal of selected *Eremophila acutifolia* individuals within the clearing area would not pose a significant risk to local populations.	MinRes requests that Condition 9 be removed.
Fauna Management – Pre-clearance surveys			
10(a)	Prior to undertaking any clearing authorised under this permit, the permit holder shall engage a fauna specialist to undertake clearance surveys within the areas cross-hatched yellow on Figure 1 of Schedule 1 for Shield-backed trapdoor spiders (*Idiosoma sp*.) and Malleefowl (*Leipoa ocellata*), including the identification and inspection of burrows and active and inactive mounds.	Requested removal of this condition based on the outcomes of the Bennelongia (2025) SRE Report, whereby: *'One group within mygalomorph spiders that has conservation significance is the shieldbacked trapdoor spiders, i.e., species from the Idiosoma nigrum complex. While three species from the Idiosoma genus were recovered from this survey (I. `BMYG168`, I. `BMYG249` and I. `MYG244`), both morphological and genetic analysis concluded they are not part of the nigrum complex and are therefore not shield-backed trapdoor spiders.'* Idiosoma sp. identified within the Bennelongia (2025) survey were mygalomorph spiders from the Idiopidae family, known to be widespread species with a range >229 kms and 100 kms (respective of identified species, MBYG168 and MYG244). One Idiosoma sp. (BMYG249) was determined Potential – unlikely for SRE status, with a determined linear range of 36 kms. The initial Bennelongia (2024) SRE survey identified 17 Idiosoma sp. with potential to occur in the area based on historic records within a 100 x 100 km range during their	MinRes requests that text in Condition 10(a)(b)(c) relating to Idiosoma sp. be removed.

Condition Reference	Condition Text	Discussion/ Change Proposed	Proposed Action
		desktop assessment. However, we note that none of these entities are taxonomically considered to be part of the nigrum complex and are therefore not shield-backed trapdoor spiders.	
10(b)	The Shield-backed trapdoor spider and Malleefowl pre-clearance survey should also include searches for other conservation significant fauna.	MinRes notes that subsequent to the approval being provided, numerous supporting surveys have been conducted or received within the area, including: **SRE:** • Bennelongia (2024) SRE Invertebrate Survey at the Mt. Marion Lithium Project. • Bennelongia (2025) Short Range Endemic Survey at the Mt. Marion Lithium Project. These surveys have markedly increased the understanding of the likelihood of conservation significant fauna to occur in the area, and no conservation significant matters have been identified in the relevant areas. MinRes requests Condition 10 be removed from the NVCP instrument, as we feel that this condition is no longer required.	MinRes requests that text in Condition 10(a)(b)(c) be removed.
10(c)	Where the burrows and mounds are identified under condition 10(a) of this permit, the permit holder shall; i) Flag the location of the burrow(s) and mound(s); ii) Not clear within 50m of a single shield-backed trapdoor spider burrow(s); iii) Not clear within 200m of matriarchal clusters of Shield-backed trapdoor spider burrows(s) iv) Not clear within 50m of Malleefowl mound(s).	Given Bennelongia's (2025) statement regarding the absence of shield back trapdoor spiders within the area: *'Both morphological and genetic analysis concluded they are not part of the nigrum complex and are therefore not shield-backed trapdoor spiders.'* There should not be a requirement for pre-clearance survey given the outcomes of the Bennelongia (2025) survey.	MinRes requests that text in Condition 10(a)(b)(c) relating to Idiosoma sp. be removed.
Fauna Management – Shield-backed trapdoor spiders			
12	Ensure no clearing occurs within the area cross-hatched red in Figure 2A and 2B of Schedule 2 of this Permit unless first approved by the CEO.	Given Bennelongia's (2025) statement regarding the absence of shield back trapdoor spiders within the area: 'both morphological and genetic analysis concluded	MinRes requests that Condition 12 be removed.

Condition Reference	Condition Text	Discussion/ Change Proposed	Proposed Action
		they are not part of the nigrum complex and are therefore not shield-backed trapdoor spiders.' Information presented in the Bennelongia (2025) report indicated that the Idiosoma sp. present are unlikely even Short-range endemic (SRE) species. On this basis, MinRes believes there is no conservation requirement to avoid the area cross-hatched red in Figures 2A and 2B of the NVCP instrument (CPS9866).	

4. ENVIRONMENTAL SETTING

4.1 CLIMATE

Typically, the climate is characterised as being arid to semi-arid Mediterranean, with mainly winter rainfall as well as summer thunderstorms. The area receives approximately 250-300 mm of rainfall per year. The nearest official meteorological weather station with the most complete and up to date information is Kalgoorlie- Boulder Airport, which is located approximately 32 km north of the survey area (BoM, Bureau of Meteorology, 2023)

The annual average rainfall at Kalgoorlie is 267.7 mm over an average 39.9 rain days. Average rainfall varies across the months, with slightly larger rainfall events falling between January to March and May to July, and the least rainfall received in September. The mean annual minimum temperature at Kalgoorlie is 11.7 °C and the mean annual maximum temperature is 25.3 °C. The coldest temperatures occur in July (mean minimum temperature 5.1 °C), the hottest is January (mean maximum temperature 33.7 °C) and diurnal temperature variations are relatively consistent throughout the year. A summary of monthly averages for temperatures and rainfall recorded at Station 4106 is shown in **Figure 6**.Figure 6 Monthly maximum and minimum temperatures, rainfall and windspeed (BoM,2022)

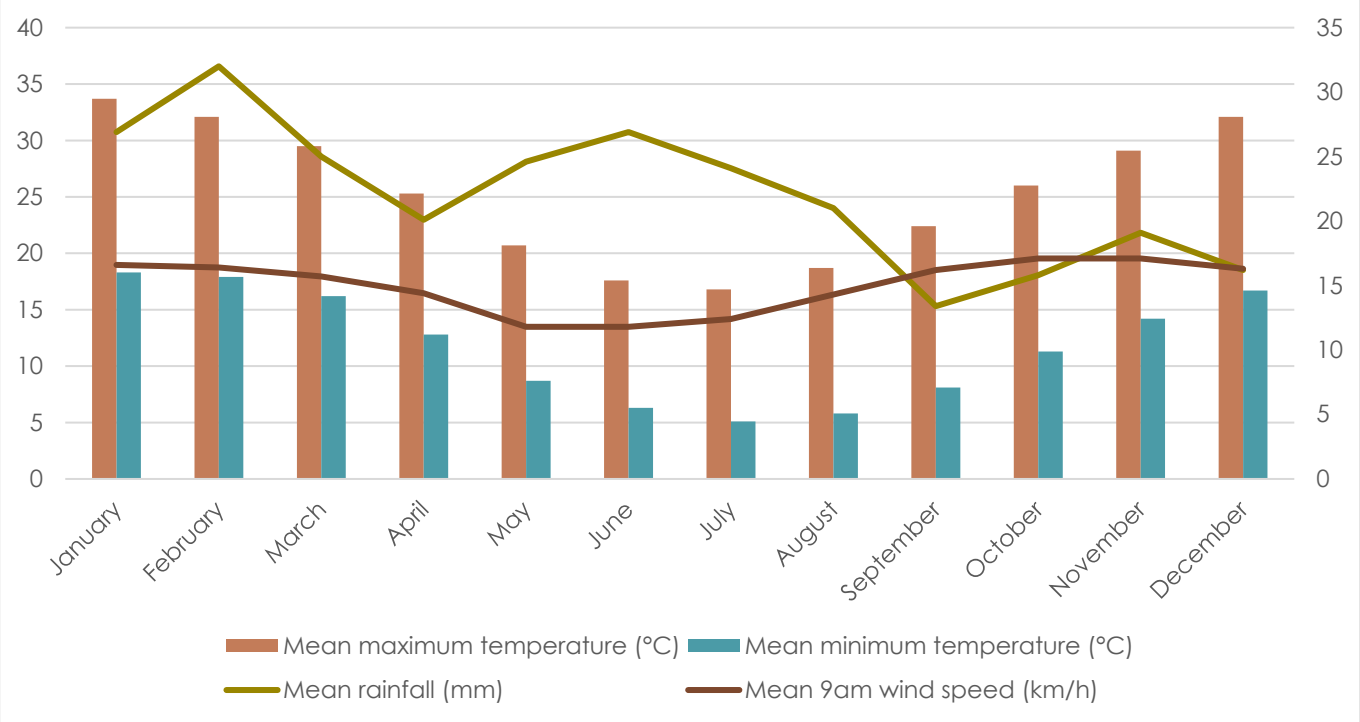

Figure 6 Monthly maximum and minimum temperatures, rainfall and windspeed (BoM,2022)

4.2 UNDERLYING GEOLOGY

The underlying geology of the subregion is gneiss and granites that have eroded into a flat plane covered by tertiary soils and with scattered exposed bedrock. Calcareous earths are the dominant soil group and cover much of the plains and greenstone areas (Cowan 2001). The vegetation associated with this underlying geology typically consists of Mallees, Acacia thickets and shrub-heaths on sandplains. Diverse Eucalyptus woodlands occur around salt lakes, on ranges, and in

valleys. Salt lakes support dwarf shrublands of samphire. Woodlands and Dodonaea shrubland are known to occur on basic granulites of the Fraser Range some distance to the southeast of the survey (CALM, 2002).

The geology of the area is dominated by a north-northwest trending Archaean metamorphosed ultramafic flow sequence of sheared talc amphibole chlorites to high magnesian basalts and interflow sediments. The sequence is intruded by shallow west dipping pegmatites emanating from the large Karamindie granitic intrusion to the southwest of the Project Area.

4.3 SOIL AND SOIL LANDSCAPES

The Permit Area is located across the Kambalda Zone in the Kalgoorlie Province soil landscape region of the Department of Primary Industries and Regional Development (DPIRD) system, which has been described at the regional level as undulating plains (with some sand plains, hills and salt lakes) on the granitic rocks and greenstone of the Yilgarn Carton (DPIRD, 2022). Soil landscape mapping identified Six soil landscapes intersecting the Permit area, as described in **Table 5** and shown in **Figure 7**.

Table 5: Soil Landscape Map Descriptions (DPIRD, 2022)

Soil Landscape Zone	Soil Landscape System	Map Unit Name	Description
265 Kambalda Zone	265Jn	Johnston Land System	Gently undulating plains with occasional granite rises, supporting eucalypt woodlands and non-halophytic shrublands
	9719	Gumland System	Extensive pedeplains supporting eucalypt woodlands with halophytic and non-halophytic shrub understoreys
	41907	Kurrawang Land System	Low hills and ridges, with occasional plateaus and scarps, and undulating stony plains, on metasedimentary and felsic volcaniclastic rocks, supporting scattered eucalypt or casuarina woodlands
	9741	Sedgman System	Gritty surfaced plains with granite outcrop and low granite domes and hills supporting acacia tall shrublands
	41871	Coolgardie Land System	Uplands and undulating plains associated with ultramafic greenstones, supporting eucalypt woodlands and halophytic shrublands
	9721	Graves System	Basalt and greenstone rises and low hills supporting eucalypt woodlands with prominent saltbush and bluebush understoreys

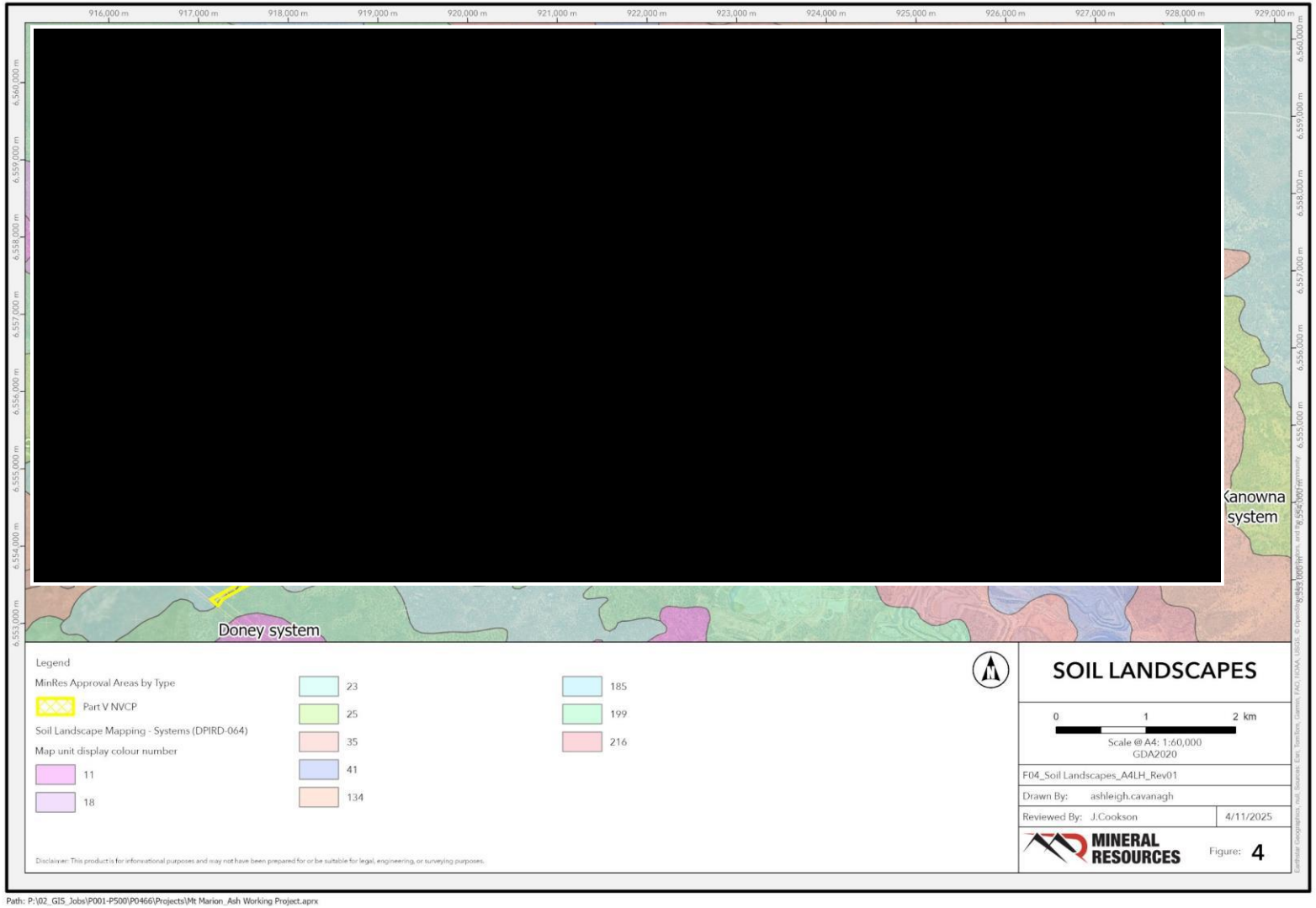

Figure 7: Soil Landscape Systems

4.4 SURFACE WATER

There are no surface water bodies or major drainage systems in the Permit Area. Drainage either broadens out to sheet flow, evaporates or infiltrates to groundwater. Surface water flows onsite are ephemeral and occur only after high rainfall events. Impacts to surface water flows are mitigated through the construction of site drainage infrastructure, including culverts. The risk from water management issues is mitigated and attenuated, as all runoff and drainage within the mining impact zone is contained with bunded areas and clearing footprints.

The closest watercourse is a non-perennial major river, running south-east of the Permit area to Lake Lefroy. This system is 9 km south-east of the Permit Area.

4.5 GROUNDWATER

Aquifers in the Goldfields region comprise two principal types, a fractured rock aquifer of weathered and fractured bedrock, and the sedimentary aquifer of buried palaeochannels. The fractured rock aquifer comprises granitic and gneiss, pegmatite and dolerite dykes, mafic and ultramafic volcanic and metasedimentary rocks (greenstones). These rocks are of low primary porosity and permeability where saturated. In general, fractured rock aquifers tend to be limited aquifers with groundwater contained in localized, structurally controlled zones related to rock competence, with limited storage capacity.

The palaeochannel comprises of a sequence of unconsolidated, medium to coarse quartz sands to clayey sands and gravels, known as the Wollubar Sandstone. The Wollubar Sandstone has both primary porosity and permeability and represents the best target for groundwater supply in the area. The unconsolidated sandstone is confined by the relatively impermeable, weathered Perkolili Shale, comprising a thick sequence of mottled, grey, red brown clay and minor sandy clay. The Wollubar Sandstone, and Goldfield's area palaeochannels, are postulated to act as a drainage system for the surrounding weathered and fractured rock basement. Groundwater quality in the palaeochannel is of poor quality and hypersaline.

4.6 LAND DEGRADATION

Land degradation caused by land clearing and associated activities can cause changes in soil health and landscape functionality including salinity, erosion, acidification, and contamination. This has the potential to ultimately alter the fundamental ability of the land to support biodiversity, ecological processes, conservation significant species, as well as cultural values, anthropogenic uses, and economic growth (Environmental Protection Authority, 2007)

The Permit Area is outside the Land Capability Mapping of the DPIRD land evaluation standards, to assess land degradation and potential land use (van Gool, 2005).

The exploration activities associated with this Project have the potential to locally exacerbate land degradation during operations however regional impacts are anticipated to be minimal when compared to the extensive use of land for Pastoral activities in the Goldfields. The implementation of mitigation measures during operations, and planned rehabilitation works (required by approved Programme of Works approvals) will reduce land degradation impacts and as such it's expected that significant land degradation will not occur as a result of this Proposal.

4.7 FLORA AND VEGETATION

To support the original application Native Vegetation Solutions (2022) had undertaken a Detailed Flora and Vegetation Survey of the Mt Marion Project Area, with the survey area directly correlated with the Permit Area. Given this survey remains valid (5 years validity) and there are no proposed

changes to the clearing allocation or boundary, the information has not been repeated in this application.

4.8 FAUNA AND HABITAT

To support the original application Bamford Consulting Ecologists (2021) conducted a basic and targeted fauna assessment (desktop assessment and targeted survey for conservation significant species) of the Mt Marion Project Area. The survey was completed for a larger project area than the proposed clearing permit boundary. The assessment included the identification of fauna habitat; opportunistic fauna observations; records of bird encounters; and targeted searches for Malleefowl, Chuditch, Arid Bronze Azure Butterfly (associated with *Camponotus* ants) and Trapdoor spiders. Given this survey remains valid (5 years validity) and there are no proposed changes to the clearing allocation or boundary, the information has not been repeated in this application.

This is with the exception of the proposed amendments to the conditions relating to the Trapdoor spiders (*Idiosoma sp.*), and details on the survey supporting this request, as discussed in Section 3.2.

5. AVOIDANCE AND MITIGATION

MinRes has an Environmental Management System (EMS); this system includes awareness training, plans, procedures and forms to avoid, minimise and ensure the effective management of environmental and heritage values.

MinRes has adopted the mitigation sequence for environmental management, which involves avoiding, minimising, and offsetting the significant residual impacts of mining activities on the environment as further defined below. These are considered sufficient to ensure the effective management of environmental risks by the proposal.

Avoid:

- Proposed clearing has been minimised as far as practicable to reduce the extent of disturbance required.
- A Land Activity Permit and the Clearing Procedure will be implemented to ensure all clearing works are compliant with regulatory requirements and are within approved boundaries.
- The area to be cleared shall be clearly demarcated and machinery operators made aware of the operational boundary, following confirmation with the relevant manager.
- Where possible, areas of confirmed Priority Flora will be avoided so that these populations are minimally affected.
- Monitor local Malleefowl population if present.

Minimise:

- Induct and educate personnel on environmental requirements of the Proposal.
- Clearing awareness training undertaken by all personnel involved in clearing activities.
- Vegetation clearing shall be kept to the minimum amount required, as far as practicable.
- Utilise existing access tracks where possible.
- Weed control and management methods will be implemented during operations where required.
- Vehicles and equipment shall not drive over, or parked on, vegetation and/or tree roots, as far as practicable.
- Undertake staged clearing.
- Clearing will be undertaken in a slow, progressive manner towards adjacent native vegetation to allow fauna to move out of the clearing area.
- Utilise already cleared land where suitable for supporting infrastructure.
- Machinery and vehicle movements should be restricted during construction to minimise the potential for vehicle strikes, where practicable.
- Machinery and vehicle movements that must be undertaken between dusk and dawn should be limited to low speeds on access tracks.
- Excavations and trenches will be kept open only as long as needed to undertake the work and egress points will be provided dependant on depth / morphology of the excavation.
- Feral species management where required.
- Manage existing surface water flows where possible.
- Manage and contain surface water flows from disturbed areas.

Rehabilitate:

- Implement appropriate rehabilitation in accordance with the approved Mine Closure Plan (MCP)(Reg ID 120019).
- Undertake progressive rehabilitation at the mine.
- Salvage and stockpile soil and/or habitat features (e.g. vegetation, stumps, logs, boulders) for use in rehabilitation programs.
- All exploration bores shall be capped and rehabilitated as required.

6. ASSESSMENT AGAINST THE TEN CLEARING PRINCIPLES

An assessment has been completed against the Ten Clearing Principles (EP Act 1986, Schedule 5) to determine if there is a likely significant environmental impact as a result of the clearing native vegetation proposed to be cleared in this application. Each principle was assessed in accordance with "A Guide to the Assessment of Applications to Clear Native Vegetation" (DER, 2014). The assessment aligns with the previous statements made within the initial Supporting Document submitted for permit CPS9866/1, with some further commentary on the updated SRE report.

In summary, the proposed clearing under permit CPS9866/1, considerate of the requested changes to the conditions, is not likely to be at variance with any of the Clearing Principles as per the initial assessment. A full assessment of the proposed NVCP Application against Clearing Principles is shown in **Table 6.**

Table 6: Assessment of the Proposal against the Ten Clearing Principles

Red – Likely to be at variance, **Orange** – May be at variance, **Green** – Not likely to be or not at variance.

Clearing Principle	Impact Category	Assessment of Clearing Principle
(a) Native vegetation should not be cleared if it comprises a high level of biological diversity	**Not likely to be at variance**	There are no anticipated differences between the original assessment and this amendment submission. It remains valid that the clearing under this permit will not be a variance with Clearing Principal (a), as the only conditions that are proposed for amendment in relation to native vegetation, are for the species *Eremophila acutifolia*. The species has been delisted since the submission and approval of the original CPS8966/1 application, and therefore it is proposed that the associated condition (Condition 9) be removed from the amended instrument. It remains valid that there are no threatened or priority ecological communities, no reserves, conservation areas or other DBCA managed lands and that the management measures previously proposed under this permit, are expected to ensure minimal risk to the biodiversity values within the area.
(b) Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia.	**Not likely to be at variance**	The original discussion for Clearing Principal (b) included a statement from BCE (2022) which noted the overall residual impact of the clearing on conservation significant species was negligible. The habitat types within the survey area were not fragmented or threatened by edge effect. Three types of VSAs were observed [redacted] and considered important for fauna. BCA (2022) states that although population decline is inevitable with some habitat loss, the significance depends on proportion of VSA and populations impacted. Most of the project area contains VSAs that are well represented in the region (BCE, 2022). BCA (2022) identified Trapdoor Spider burrows and two Malleefowl mounds within the CPS9866/1 area, with one of these mounds being recent but inactive. Impacts to Malleefowl and Malleefowl mounds can be effectively managed through reconnaissance assessment of areas proposed for exploration by MinRes' field technicians prior to exploration. Further SRE surveys undertaken by Bennelongia (2025) identified the existing *Idiosoma spp* to a morphological level, confirming that the species that occur within the CPS9866/1 and surrounds, are not of conservation significance. As further discussed in Section **Error! Reference source not found.**, three species from the *Idiosoma* genus were recovered from this survey (I. `BMYG168`, I. `BMYG249` and I. `MYG244`), however both morphological and genetic analysis concluded they are not part of the nigrum complex and are therefore not shield-backed trapdoor spiders. MinRes will continue to avoid and minimise impacts to significant fauna habitat when clearing under the permit. Clearing therefore is unlikely to be at variance to this principle.
(c) Native vegetation should not be cleared if it includes, or is necessary for the	**Not likely to be at variance**	At the time of the original assessment for CPS9866/1, *Eremophila acutifolia* (P3) were listed as a priority species and populations were dominant lower stratum species. It was stated within the assessment that large numbers were present throughout the local and regional area and the species was well

Clearing Principle	Impact Category	Assessment of Clearing Principle
continued existence of, rare flora.		documented by previous flora surveys. The species has since been delisted from the Priority Species list and this amendment proposed to remove conditions subject to the species. Based on the above, the proposed clearing is unlikely to impact on the continued existence of rare flora and is not likely to be at variance to this 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.	**Not likely to be at variance**	Desktop searches identified no PEC or TECs within 50 km of the survey area. Field surveys confirmed that there was no PEC or TECs within the survey area, and hence the permit area for CPS9866/1. The clearing of native vegetation is therefore not at variance to this 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.	**Not likely to be at variance**	All per the assessment of Clearing Principle (e) within the initial assessment, species composition and vegetation types within the CPS9866/1 permit area are typical of the local region and not considered to be unusually diverse (NVS, 2022). Based on the low level of disturbance, the lack of fragmentation of vegetation and vegetation condition generally rated as 'Good' to 'Very Good' (Keighery, 1994), the area proposed subject to CPS9866/1 and proposed to be cleared, is not considered to be remnant vegetation. As noted in BCE (2022), the project area lies within the Coolgardie Vegetation System. All woodlands in the Coolgardie System have been logged in the past for mining timber and firewood and current vegetation is secondary growth regenerated from seed and coppice (Beard, 1972). Given the above, the clearing of native vegetation is unlikely to be at variance to this 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.	**Not likely to be at variance**	As per the initial assessment for CPS9866/1 permit area, there are no permanent watercourses or wetlands within or in the vicinity of the survey area. The nearest water bodies are located over 10 km to the north of the proposed clearing area (Lake Douglas, Lake Red and Lake Brown), with the next closest water body being Lake Lefroy, located approximately 26 km to the southeast of the proposed clearing area. The clearing of native vegetation is unlikely to be at variance to this principle.
(g) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.	**Not likely to be at variance**	As per the initial assessment of CPS9866/1 permit area, any clearing of native vegetation within the survey area has the potential to cause soil and wind erosion. The landscape units for this survey area are Kambalda (265) and Norseman (266) (DPIRD, 2019). Both have similar topography with variations in calcareous loamy earths, which when extensively cleared and left unrehabilitated, are prone to erosion. The area is arid, and unlikely to flood or become waterlogged with minor ephemeral water courses recorded in vegetation surveys by GHD (2018). The potential for soil erosion and appreciable land degradation to occur from the implementation of this proposal is unlikely. The clearing of native vegetation is unlikely to be at variance to this principle.

Clearing Principle	Impact Category	Assessment of Clearing 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.	**Not likely to be at variance**	No reserves, conservation areas or other DBCA-managed estates are located within the survey area. Two conservation areas occur adjacent to the survey area: • Karamindie Forest, northwest of the project • Yallari Timber Reserve, southwest of the access to the project. As per the initial assessment, the proposal is not anticipated to significantly impact upon either of the areas above or affect the values associated with these areas. The clearing of native vegetation under this permit is unlikely to be at variance to this 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.	**Not likely to be at variance**	The survey area is located in the *Rights in Water and Irrigation Act 1914* (RIWI Act) listed Goldfields Groundwater Area (DWER, 2022) and the Salt Lake Basin Surface Water Management Area and Sub-area. No rivers or surface water bodies listed under the RIWI Act were identified within the survey area. There are minor ephemeral drainage lines located within the survey area. No lakes, wetlands or natural water bodies were recorded in the survey area. Average rainfall for the area is 270 mm and relatively evenly distributed throughout the year. However, rainfall is erratic from year to year. During heavy localised rainfall events erosion may occur in cleared areas leading to temporary soil erosion and/or sedimentation, particularly in the vicinity of ephemeral drainage lines. Clearing within or near a drainage line will continue to be avoided where possible. As per the initial assessment, clearing of vegetation under this permit is unlikely to cause appreciable deterioration in the quality of surface or underground water. The clearing of native vegetation is unlikely to be at variance to this principle.
(j). Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.	**Not likely to be at variance**	The climate of the region is described as semi-arid with an average annual rainfall of 270 mm. Rainfall is relatively evenly spread throughout the year but can occur in heavy localised falls. Based on an average daily evaporation rate of 7.2 mm, any surface water resulting from rainfall events is likely to be relatively short lived. In addition, the survey area is surrounded by native vegetation, and it is likely that a large proportion of runoff will be absorbed by this natural environment. There are no permanent drainage channels or wetlands within or in the vicinity of the survey area. There is one minor ephemeral drainage line within the survey area that is only likely to flow following heavy rain. The survey area is characterised by flat to gently undulating plains with silty clay soils and occasional rocky rises scattered throughout the survey area. Any surface flow is expected to be minimal, and it is unlikely that clearing for exploration in the Permit Area will lead to an appreciable increase in runoff that could cause, or exacerbate, the incidence of flooding. There are no extensively cleared areas of riverbank, paddock, pasture or fallow land near the proposal area that could exacerbate flooding. As per the initial assessment of this permit, the clearing of native vegetation is unlikely to be at variance to this principle.

7. REFERENCES

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MINERAL RESOURCES

APPENDIX A
CERTIFICATE OF TITLE

MINERAL RESOURCES

APPENDIX B
LAND ACCESS AUTHORISATION

MINERAL RESOURCES

APPENDIX C
BAMFORD CONSULTING ECOLOGISTS (2022) FAUNA ASSESSMENT

MINERAL RESOURCES

APPENDIX D

BENNELONGIA (2025) MT MARION SHORT RANGE ENDEMIC SURVEY

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