

12 June 2025

General Manager
Environmental Assessments West (WA, SA, NT) Branch
Department of Climate Change, Energy, the Environment and Water

Dear Sir/Madam,

RE: Bidaminna Project (EPBC 2022/09360) – Section 156A Request to Vary Proposed Action

Image Resources NL (Image) is seeking to develop the Bidaminna Project (Proposed Action), located in the Shire of Dandaragan, approximately 100 kilometres (km) north of Perth in the Western Australia (WA) Wheatbelt region. The Proposed Action is to develop a mineral sand mine, including dredge mining and the construction of processing plants, solar drying ponds and supporting infrastructure, with an estimated mine life of ten years.

The Proposed Action was referred under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth; EPBC Act) in September 2022. The Department of Climate Change, Energy, the Environment and Water (DCCEEW) released its decision that the Proposed Action was a controlled action under Section 75 of the EPBC Act on 15 February 2023 (EPBC 2022/09360) and an accredited assessment approach under the *Environmental Protection Act 1986* (WA; EP Act) was determined on 18 May 2023. DCCEEW determined that the relevant controlling provision for the Proposed Action is:

- Listed threatened species and communities (Sections 18 and 18A of the EPBC Act).

The WA Environmental Protection Authority (EPA; the delegated authority for Environmental Impact Assessment in WA) determined that the Proposed Action required assessment at a Public Environmental Review level of assessment (s. 40(2)(b) and s. 40(4) of the EP Act).

Since the referral of EPBC 2022/09360, Image has also been granted EPBC approval 2024/10076 to undertake mineral resource, geotechnical and groundwater resource test drilling to better define the mineral sand and groundwater resources available at the Bidaminna Project (EPBC 2022/09360).

During a meeting between DCCEEW and Image on 11 April 2025 regarding EPBC 2024/10076, DCCEEW requested that Image submit a Section 156A under the EPBC Act to specify that the mineral resource, geotechnical and groundwater resource test drilling approved under EPBC 2024/10076 was not included in the scope of the EPBC 2022/09360 Proposed Action.

The purpose of this letter is to request a variation to EPBC 2022/09360 under Section 156A of the EPBC Act. The request for variation has been prepared according to section 5.07 - 5.09 of the Environment Protection and Biodiversity Conservation Regulations 2000 (EPBC Regulations) and accordingly provides the following information:

- a) Details of the proposed variation to the Proposed Action;
- b) The reasons for the proposed variation;

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- c) How the impacts of the proposed variation on Matters of National Environmental Significance (MNES) compare with those of the original Proposed Action;
Please note that the following information items listed in section 5.08 of the EBPC Regulations were not applicable (due to no additional impacts) and thus not included:
- d) The impacts of the proposed variation on MNES not considered in the referral or assessment of the original Proposed Action; and
- e) Alternatives, mitigation measures and offsets to compensate for additional impacts on MNES.

INFORMATION FOR A REQUEST TO VARY A PROPOSAL TO TAKE AN ACTION

a) Details of the proposed variation to the Proposed Action :

The proposed variation is only to specify that mineral resource, geotechnical and groundwater resource test drilling are not included in EPBC 2022/09360. Note that the Proposed Action description for EPBC 2022/09360 did not state that mineral resource, geotechnical and groundwater resource test drilling were included, therefore this S156A application only seeks to clarify that these activities are excluded.

The following wording is proposed to be included in the Proposed Action details:

Mineral resource, geotechnical and groundwater resource test drilling activities are not included as part of the Proposed Action.

b) Reasons for the proposed variation

The proposed variation was requested by DCCEEW during a meeting conducted with Image on 11 April 2025 regarding EPBC 2024/10076.

DCCEEW requested Image to specify that the mineral resource, geotechnical and groundwater resource test drilling are not part of EPBC 2022/09360, to avoid any confusion.

c) Comparison of the potential impacts on MNES of the proposed variation

There are no changes to the potential impacts on MNES between the Proposed Action and the proposed variation.

FURTHER ENQUIRIES

Should you have any queries or require any additional information please do not hesitate to contact me at

██████████ or ██████████ from Preston Consulting Pty Ltd at
██████████

Yours faithfully



Senior Consultant – Image Resources NL

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