Wilcherry Weednanna Gold and Iron Project

Application Number: **03090** Commencement Date: **13/08/2025** Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

Wilcherry Weednanna Gold and Iron Project

1.1.2 Project industry type *

Mining

1.1.3 Project industry sub-type

Other

1.1.4 Estimated start date *

01/07/2026

1.1.4 Estimated end date *

30/06/2033

1.2 Proposed Action details

1.2.1 Provide an overview of the proposed action, including all proposed activities. *

The Proposed Action (the Wilcherry Weednanna Gold and Iron Project or “WGIP”) is the construction, operation of and closure/rehabilitation of an open cut and underground gold and iron ore mine. The proponent for the WGIP is Alliance (Eyre) Pty Ltd (“Alliance”).

The WGIP is located within existing exploration licence EL6188 on pastoral land approximately 40 km north of Kimba on the Eyre Peninsula, South Australia. Refer to Att1_WGIP_Map Series, Map1_Project Overview for location. The WGIP will be contained within a mining lease area (MLA), which was approved by the South Australian Department for Energy and Mining (DEM) in August 2025 (refer copy of ML 6565 via hyperlink). Land in the immediate vicinity of the WGIP area is currently used for pastoral, minor extractive (borrow pits) and mineral exploration purposes. The WGIP will include:

- Two open pits with underground mining from one pit
- Surface stockpiles
- Gold processing plant
- Tailings storage facility (TSF)
- Waste rock facility (WRF)
- Power plant
- Internal mine road network
- Mine administration office, workshop, ablutions and crib room
- Water supply wellfield (already constructed), water supply pipeline, water treatment plant, water storages and pit dewatering
- Explosives storage
- Mine access road (already constructed)

Refer to Att1_WGIP_Map Series, Map2_Project Layout.

Accommodation for mine personnel will be provided in an existing 80-person accommodation village located in Kimba, South Australia, with personnel transported approximately 40 km to the mine site via existing roads.

The proposed life of mine is seven years including one year of construction, five years of mining (5 years open pit and three years underground, with open pit and underground mining occurring concurrently during years 3-5), and one year of closure and rehabilitation.

The proposed mine will extract and process gold and iron ore. The gold ore will be crushed, milled, and processed on site; gold bars produced on site will be transported by road in armoured vehicles to Adelaide. The iron ore will be crushed and screened on site to generate a Direct Shipping quality ore, which will be transported by road via the Eyre Highway to Whyalla and Port Augusta.

Activities proposed include:

Pre-clearing activities - surveying and environmental monitoring.

Clearing activities - vegetation clearance, removing and stockpiling topsoil/subsoil, and installation of fencing.

Construction activities – excavation of base material; construction of hardstand areas, internal roads and laying of surface water supply pipeline; installation of power supplies, office building, workshop, ablutions and crib room.

Operational activities – excavation of pits; use of explosives; construction of TSF and WRF; installation of water treatment plant; onsite crushing, screening and processing of ore; transportation of gold and iron ore via existing roads; pit dewatering and extraction of groundwater via water supply wellfield; progressive construction of safety bund around pits; and ongoing environmental monitoring. Progressive rehabilitation will occur throughout operations where possible.

Rehabilitation and closure activities (post mine completion) – decommissioning of plant; removal of buildings and surface infrastructure; removal of hardstand areas and internal roads; rehabilitation of TSF and WRF; completion of safety bund around pits; return of topsoil; ongoing environmental monitoring.

The project also includes use of a mine access route linking the project site to Kimba and the Eyre Highway. The mine access route includes Council-maintained (District Council of Kimba) public road, the Drekurmi Road, an existing public access road (PAR) on the pastoral lease of Uno Station, and station tracks, collectively referred to as the “Mine Access Road” for this Project. These are existing unsealed roads, designed and constructed by Council for agricultural use and for a previous mining project. These roads are suitable for the transport of materials and product for the Project. These roads will require ongoing maintenance throughout the life of The Project.

A small section of unsealed road (approximately 550 m) will require construction to connect the existing Mine Access Road to the MLA. This section of new road is being constructed to ensure project traffic will be south of Avoidance Area 1 (refer Att1_WGIP_Map Series, Map 5_ Avoidance Areas). After it is constructed, it will form part of the Mine Access Road.

The Proposed Action is located within the Gawler Rangers Native Title area and contained within the pastoral lease of Uno Station (Leasehold portion CL Volume 1290 Folio 4) and Nonning Station (Leasehold portion CL Volume 1298 Folio 25). Both pastoral leases are held by the Nonning Pastoral Company. Refer to Att1_ WGIP_ Map Series, Map 1_Project Overview for location.

Direct impacts on the environment from the proposed activities include the following:

Native vegetation clearance

Native vegetation clearance will be undertaken to the minimum extent necessary to enable the mine components and infrastructure to be established. Direct clearance of 182.29 ha of native vegetation is expected due to the Proposed Action (approximately 3.9% of the total Project Area). Native vegetation clearance will be subject to a Significant Environmental Benefit offset in accordance with the *Native Vegetation Act 1991 (SA).*

Native vegetation clearance will result in direct loss of potential fauna habitat. However, the impacted habitat is not critical habitat for EPBC listed fauna, and no significant impacts to Matters of National Environmental Significance (MNES) are expected as a result of the Proposed Action (refer to Att2_WGIP SIA, Section 6, Table 6.1, pg 83). Two areas of avoidance (Avoidance Area 1 and Avoidance Area 2, refer Att1_WGIP_Map Series, Map 5_ Avoidance Areas) have been included as part of the design and layout of the Proposed Action to ensure impacts to ecological values are minimised.

Changes to surface water flow

Some change in surface water flow is likely where mine infrastructure intersects ephemeral drainages. This may alter the quantity of water for surface water Environmental Values (EVs) such as terrestrial vegetation or stock dams outside of the Project Area. Stormwater management structures to divert runoff from mine infrastructure have been incorporated into the mine design. Given the stormwater controls that will be put in place for the Project, the surface water quantity effects from the Proposed Action are assessed as negligible. No project infrastructure is expected to permanently alter water flow within the Lake Gilles tributaries.

Sediment loads carried by surface flow are likely to increase due to construction. Therefore, erosion protection and sediment controls have been included in the design of the mine infrastructure. Areas where hazardous materials are stored have been designed to minimise likelihood of any spills contaminating surface water. The WRF has been designed with appropriate stormwater collection and drainage controls. The TSF will be lined and include leakage detection to minimise the potential for seepage that could induce surface expression of seepage impacted water. Overall impacts to surface water quantity from the Proposed Action are expected to be minimal (refer to Att6_WGIP_Water Studies, pg17, and pg20-21).

Groundwater extraction

Groundwater extraction to supply water for the WGIP is expected to have several direct impacts on groundwater, which include groundwater drawdown, changes in groundwater quality, and the potential for contamination.

Groundwater modelling (refer Att6_WGIP_Water Studies, pg 14-16) was undertaken to simulate potential changes to groundwater quantity as a result of mining activities. The modelling indicates that drawdown is not considered to present a threat to the use of stock wells in the region and there will be no change to the water balance of Lake Gilles and surrounds. Terrestrial vegetation in the area is shallow-rooted and not reliant on groundwater for supply, so groundwater use is not expected to impact vegetation. Groundwater Dependent Ecosystems (GDEs) rely on surface expressions of groundwater, but groundwater in the Project Area is deep and saline, making it unlikely to support significant vegetation. Stygofauna are unlikely to exist due to the high groundwater salinity.

The model also simulated the transport of solutes in the groundwater relating to the seepage of potential contaminants from the TSF and the WRF. Results show that the majority of TSF and the WRF seepage is intercepted by the mine pit, leaving only minimal residual solute concentrations (refer to Att6_WGIP_Water Studies, pg 14-16).

Overall, the direct impacts on groundwater from the proposed activities are expected to be minimal and manageable with the implementation of appropriate mitigation measures.

Indirect impacts on the environment from the proposed activities include the following:

- Potential for reduced condition (including abundance or diversity) of native vegetation as habitat due to fugitive dust emissions, or uncontrolled surface water run-off and associated sedimentation.
- Noise emission impacts to threatened species habitat suitability (e.g. blasting, light and heavy vehicles, equipment and machinery).

These indirect impacts will be managed as per the mitigation measures outlined in the WGIP mining application (Alliance 2023), Section 7.3.2 (pg 7-9 to 7-10, Section 7.3.3 (pg 7-11 to 7-13), and Section 7.4.2 (pg 7-15 to 7-16, and Section 7.4.3 (pg 5-17 to 5-19).

The Project Area is 4,726.71 hectares (ha) (rounded to 4,727 ha) in size. The total disturbance footprint of project components is 182.29 ha (rounded to 182.3 ha). It is proposed to establish 51.01 ha (rounded to 51 ha) of Avoidance Areas.

1.2.2 Is the project action part of a staged development or related to other actions or proposals in the region?

No

1.2.6 What Commonwealth or state legislation, planning frameworks or policy documents are relevant to the proposed action, and how are they relevant? *

Commonwealth Legislation

Under The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), Proposed Actions (i.e. activities or projects) with the potential to significantly impact matters protected by the EPBC Act must be referred to the Australian Minister for the Environment to determine whether they are controlled actions and require approval from the Minister.

The following matters are defined as protected matters by Part 3 of EPBC Act:

- matters of national environmental significance (MNES)
- the environment of Commonwealth land
- the environment in general if they are being carried out by a Commonwealth Government agency.

MNES, as defined under the EPBC Act, include:

1. World Heritage properties
2. Places listed on the National Heritage Register
3. Ramsar wetlands of international significance
4. Threatened flora and fauna species and ecological communities
5. Migratory species
6. Commonwealth marine areas
7. Nuclear actions (including uranium mining)
8. Water resources, in relation to coal seam gas or large coal mining development.

The Action is being referred to the Commonwealth Minister for the Environment given the Action's potential impacts to threatened fauna and flora species. No other MNES are considered to be potentially impacted by the Action.

Prior to Alliance acquiring the Wilcherry Weednanna Gold and Iron Project (WGIP), Ironclad Mining Limited (Ironclad) planned to develop an iron ore mining operation at the same location. The iron ore project was given approval by the SA Government in 2011 and received EPBC approval in 2011 under EPBC 2010/5478; however, it did not proceed due to significant economic challenges at the time. It should be noted that the Project Area for the WGIP overlaps with the project area of the previously approved (much larger) IronClad project.

State (SA) Legislation

Mining Act 1971 (SA)

The principal legislation for the regulation of mining in South Australia is the Mining Act, which is administered by the Department for Energy and Mining (DEM). Under this act, the proponent must obtain a mining lease (ML) and have an approved program for environmental protection and rehabilitation (PEPR) in order to proceed with a mining project.

Applications go through a two-stage process before mining operations can begin:

1. Assessment and grant of a mineral tenement (ML)

2. Assessment and approval of a PEPR to operations to commence.

The first stage of this process has been completed. Alliance prepared and submitted a mining application to DEM in February 2023. A copy of the WGIP mining application (Alliance 2023) can be obtained via the link provided.

In August 2025, DEM approved the mining application and granted the ML (refer copy of ML 6565 via hyperlink). Alliance will now undertake the second stage by preparing a PEPR for assessment and approval by DEM.

Landscape South Australia Act 2019 (SA)

The *Landscape South Australia Act 2019* (Landscape Act) promotes sustainable and integrated management of the State's landscapes and provides for their protection. The Landscape Act is the key framework for managing the State's land, water, pest plants and animals, and biodiversity across the State. The Landscape Act is administered by eight regional Landscape SA boards, in partnership with the Department for Environment and Water (DEW). The WGIP is within the South Australian Arid Lands (SAAL) Landscape Management Region (LMR).

Under the Landscape Act, certain areas within the State have been designated 'prescribed water resource areas' in recognition that they require ongoing water resources management. The WGIP is outside any prescribed water resource areas (Landscape SA, 2021) and is therefore not subject to a water allocation plan and does not require a water licence for groundwater extraction. However, water well permits are required for the drilling, testing and operation of any water production wells (bores).

Environment Protection Act 1993 (SA)

The *Environment Protection Act 1993* (EP Act) sets up a framework that imposes both a general environmental duty and a licensing regime where activities of prescribed environmental significance require a licence from the Environment Protection Authority (EPA) to operate. A valid development approval or EPA-issued Works Approval is required prior to granting a licence for a new development. Under the EP Act, mining and mineral processing is a prescribed activity and requires an environmental authorisation in the form of a works approval and/or licence from the EPA to proceed with scheduled activities. The scheduled activities identified in Schedule 1 of the EP Act, which will trigger the requirement for a works approval and licence, are:

- 2(9) mineral works – the conduct of works for processing mineral ores, sands or earths to produce mineral concentrates (relating to the magnetic separation works).
- 3(5) activities producing listed wastes (relating to the presence of asbestos).
- 7(3) crushing, grinding or milling - processing (by crushing, grinding, milling or separating into different sizes by sieving, air elutriation or in any other manner) rock, ores or minerals at a rate in excess of 1 000 tonnes per year not on a mining lease or miscellaneous purposes licence, (relating to the separation of material from borrow pits for road construction).
- 7(7) extractive industries - the conduct of operations involving extraction, or extraction and processing (by crushing, grinding, milling or separating into different sizes by sieving, air elutriation or in any other manner) of sand, gravel, stone, shell, shale, clay or soil, being operations with an extraction production rate exceeding 100,000 tonnes per year (relating to the extraction and crushing and screening of material from borrow pits for road construction.
- 8(2) fuel burning - the conduct of works or facilities involving the use of fuel burning equipment, including flaring (other than flaring at petroleum production, storage or processing works or facilities that do not have a total storage capacity or total production rate exceeding the levels respectively specified in clause 1(5)) or incineration, where the equipment alone or in aggregate is capable of burning combustible matter at a rate of heat release exceeding five megawatts (relating to the use of fuel for power generation.

Native Vegetation Act 1991 (SA)

The *Native Vegetation Act 1991* (NV Act) (and the Native Vegetation Regulation 2017) is administered by the Native Vegetation Council (NVC). It provides incentives and assistance to landowners in relation to the preservation and enhancement of native vegetation and regulates the clearance of native vegetation. Operations authorised under the Mining Act are exempt from the Native Vegetation Act, provided that clearance is undertaken in accordance with an approved native vegetation management plan. DEM, as the delegated authority with respect to mining operations, approves the native vegetation plan. DEM must be confident the management plan will provide either a significant environmental benefit (SEB) on the site or within the same region of the State, or a payment has been made to the NVC sufficient to achieve a SEB elsewhere in the State.

The Action will require clearance of remnant vegetation. Given the action is in the South Australian Arid Lands (SAAL) Region and is managed by the SAAL Landscape Board (LMR), assessments of vegetation and resultant offsets must be calculated using Rangeland Assessment Methodology (RAM).

Planning, Development and Infrastructure Act 2016 (SA)

The *Planning, Development and Infrastructure Act 2016* (PDI Act) governs the use, development and management of land and buildings and provides a planning system to regulate development within the State, including rules with respect to the design, construction and use of buildings, and other initiatives to facilitate the development of infrastructure, facilities and environments that will benefit the community.

Mining projects that are considered to be of 'major project' status, that is, of major environmental, social or economic impact, are assessed under the PDI Act, as are Prescribed Mining Operations. The project has not been deemed a 'major project', nor does it fit the definition of Prescribed Mining Operations and, therefore, does not require assessment and approval under the PDI Act.

Aboriginal Heritage Act 1988 (SA)

The Aboriginal Heritage Act 1988 (AH Act) provides automatic protection for all Aboriginal sites, objects, and remains—whether registered or not—and makes it an offence to damage or interfere with them without authorisation. The AH Act requires anyone proposing activities that may impact Aboriginal heritage, such as mining, to seek approval from the Minister under Section 23. It also promotes consultation with Traditional Owners and maintains a Central Archive of heritage information to support cultural preservation and compliance.

Proponents of a mining development are required to provide a copy of a search of Aboriginal Heritage sites listed in the Central Archive managed by the Aboriginal Affairs and Reconciliation (AAR) of the SA Department of Premier and Cabinet. A search of the Register of Aboriginal Sites and Objects showed that there are no entries for Aboriginal sites within the mining lease area (including a 250m buffer), refer to Att5_AAR Search Results.

Cultural heritage searches and surveys have been undertaken in the Project Area and significant consultation has taken place between Alliance and GRAC as holders of native title. This culminated in the signing of a Native Title Mining Agreement (NTMA) that includes compensation and heritage management arrangements, which was registered with DEM on 27 October 2022. For note, details of cultural heritage surveys are confidential and cannot be provided by Alliance. Permission to view these must be sought directly from GRAC.

1.2.7 Describe any public consultation that has been, is being or will be undertaken regarding the project area, including with Indigenous stakeholders. Attach any completed consultation documentations, if relevant. *

Alliance developed and implemented a Stakeholder Engagement Plan for the project according to the International Association for Public Participation (IAP2) Public Participation Spectrum (PPS). The Stakeholder Engagement Plan includes stakeholder identification and mapping, key messages and methods of engagement (refer Att4_WGIP_Community Engagement Plan, pg 2). Engagement activities with key stakeholders and community commenced in 2020 and have continued throughout project development. An engagement register is maintained by Alliance to capture engagement activities, issues raised and outcomes, including email communications, phone calls and meetings. A copy of the engagement register is included in Att4_WGIP_Community Engagement Plan, Appendix D. A summary of consultation undertaken to date is as follows.

Local and Regional Community, Businesses and Council

Alliance has had ongoing engagement with the local and regional community, businesses and Council since 2020. Examples of activities include:

- One-on-one briefings with the District Council of Kimba to introduce Alliance and the Wilcherry project (July 2020) and subsequent updates on project status (from late December 2020 to present).
- One-on-one briefing with the City of Whyalla to introduce Alliance and the Wilcherry project (March 2021).
- Provision of Fact Sheet to the Kimba local community and businesses as part of a letter box drop and Facebook notification to inform local community about upcoming information “drop-in” sessions (December 2020). Community information drop-in sessions held in Kimba over three days to identify issues and obtain feedback from Kimba local community and businesses, District Council of Kimba and local landholders (February 2021).
- Attendees at the drop-in sessions held between 3-5 February 2021 representing the Kimba community and businesses expressed positive interest in the project and employment and/or service opportunities. Interested attendees placed on an employment/services register to be updated regarding project opportunities as the project progresses (registrations ongoing).
- Letter drops to residents to provide an update on progress of project to Kimba local community and businesses, District Council of Kimba and local landholders (November 2021).
- Emails to registered contacts regarding community drop-in sessions for project update (early October 2023). Facebook notification to inform local community about upcoming information drop-in sessions (early and mid-October 2023). Community information drop-in sessions held in Kimba over three days to provide project updates, to identify issues and obtain feedback from Kimba local community and businesses, District Council of Kimba and local landholders (late October 2023).
- Local community and business attendees at the October 2023 drop-in sessions showed positive interest in the project and its potential to provide economic development opportunities for Kimba and the region. Interested attendees added to communication and/or employment/services register (registrations ongoing).

Key feedback from consultation with the local and regional community and businesses indicates broad support for the project, particularly with regards to the potential for economic development for Kimba and the surrounding area. Opportunities for local employment and use of local services were also a key feature of the feedback. Alliance has committed to using local goods and services and employing local personnel wherever possible.

Alliance has also been and will continue to be a sponsor of key regional community events such as the Nonning Gymkhana and Motokhana (March 2024 and March 2025) with attendance by Alliance representatives, the Kimba Show (June 2025) and the Kimba Christmas Markets (upcoming December 2025). Alliance is also investigating opportunities with charity FareShare and Council to utilise the commercial-grade kitchen of Alliance’s existing Kimba Accommodation Facility to provide meals for those in need in the region.

Native Title Holders

Proponents of a mining development are required to request a search of Aboriginal Heritage sites listed in the Central Archive managed by the Aboriginal Affairs and Reconciliation (AAR) of the SA Department of Premier and Cabinet. A search of the Register of Aboriginal Sites and Objects showed that there are no entries for Aboriginal sites within the mining lease area (including a 250m buffer) (refer to Att5_AAR Search Results, pg 1).

Cultural heritage searches and surveys have been undertaken in the Project Area and significant consultation has taken place between Alliance and the Gawler Ranges Aboriginal Corporation (GRAC) as holders of native title. This has included compensation arrangements, with agreement having been reached. A Native Title Mining Agreement (NTMA) was registered with DEM on 27 October 2022. Details of the cultural heritage surveys are confidential and cannot be provided by Alliance – permission to view these must be sought directly from GRAC.

Landholder

One-on-one meetings in person or via phone between Alliance and the pastoral lease holder about potential project impacts have been ongoing since March 2021. Draft documentation has been completed, subject to ongoing negotiations of access and compensation agreement.

Government

Alliance has met regularly with the SA Department for Energy and Mining (DEM) about the project since 2020. Other SA government agencies have been engaged as the project has progressed, including formal meetings to discuss project impacts with DEM and the Department for Environment and Water (DEW).

An EPBC pre-referral meeting was held with DCCEEW on 18 June 2025.

1.3.1 Identity: Referring party

Privacy Notice:

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

By completing and submitting this form, you consent to the collection of all personal information contained in this form. If you are providing the personal information of other individuals in this form, please ensure you have their consent before doing so.

The Department of Climate Change, Energy, the Environment and Water (the department) collects your personal information (as defined by the Privacy Act 1988) through this platform for the purposes of enabling the department to consider your submission and contact you in relation to your submission. If you fail to provide some or all of the personal information requested on this platform (name and email address), the department will be unable to contact you to seek further information (if required) and subsequently may impact the consideration given to your submission.

Personal information may be disclosed to other Australian government agencies, persons or organisations where necessary for the above purposes, provided the disclosure is consistent with relevant laws, in particular the Privacy Act 1988 (Privacy Act). Your personal information will be used and stored in accordance with the Australian Privacy Principles.

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☑ **Confirm that you have read and understand this Privacy Notice ***

1.3.1.1 Is Referring party an organisation or business? *

Yes

Referring party organisation details

ABN/ACN	21459872063
Organisation name	The Trustee for Johnston Family Trust T/A Kinesis Projects
Organisation address	8 Rowells Road, Lockleys 5032 SA

Referring party details

Name	Amy Tucker
Job title	Senior Scientist and Stakeholder Engagement Specialist
Phone	0414 917 444
Email	amy@kinesisprojects.com.au
Address	8 Rowells Road

1.3.2 Identity: Person proposing to take the action

1.3.2.1 Are the Person proposing to take the action details the same as the Referring party details? *

No

1.3.2.2 Is Person proposing to take the action an organisation or business? *

Yes

Person proposing to take the action organisation details

ABN/ACN	37095337385
Organisation name	ALLIANCE (EYRE) PTY LTD
Organisation address	Suite 3, 51 - 55 City Road Southbank VIC 3006

Person proposing to take the action details

Name	Steven Gandel
Job title	Chief Executive Officer
Phone	0418151617
Email	steveg@gandelmetals.com.au
Address	Suite 3, 51 - 55 City Road Southbank VIC 3006

1.3.2.14 Are you proposing the action as part of a Joint Venture? *

No

1.3.2.15 Are you proposing the action as part of a Trust? *

No

1.3.2.17 Describe the Person proposing the action's history of responsible environmental management including details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the Person proposing to take the action. *

Alliance (Eyre) Pty Ltd (the applicant) is a wholly owned subsidiary of Alliance Resources Limited.

Alliance Resources Limited is an Australian gold, iron and base metals exploration and development company with projects in South Australia and Western Australia. The entity was listed on the ASX up to 19 July 2022 however, following a formal takeover and compulsory acquisition process, has now become privately owned.

The Company's flagship asset is the Wilcherry Weednanna Gold and Iron Project (WGIP), located within the Gawler Craton on the northern Eyre Peninsula near the township of Kimba in South Australia. Alliance Resources and the WGIP are backed by significant private ownership with extensive experience across Australia and SA.

The parent company of Alliance Resource, Gandel Metals Pty Ltd, holds other interests in the Australian natural resources sector, including significant shareholdings in the following ASX-listed companies:

- Gold producer Alkane Resources Ltd, which owns and operates the Tomingley Gold Mine in central western NSW, the Costerfield Gold-Antimony Mine in central Victoria, the Bjorkdal Gold Mine in Sweden and is developing the Boda Kaiser gold-copper project in central western NSW.
- Rare earths developer Australian Strategic Materials Ltd, which owns the Dubbo Zirconium and Rare Earths Project in central western NSW and operates its Korea Metals Plant in Ochang Province, South Korea, producing rare earth alloy metals for high-technology manufacturing applications globally.

Alliance has not contravened or failed to comply with a provision of a corresponding law or designated Act in connection with authorised operations carried out by Alliance within the proceeding period of 5 years.

The Senior Management Team that will be responsible for constructing, commissioning and operating the WGIP has more than 120 years combined experience in open pit and underground mining projects. The team has an exemplary record of operating projects safely with no significant social, environmental or operational breaches or accidents. The project will be managed under strict geological and survey control to preserve grade and tonnes, under stringent safety operating standards.

Alliance has not had any action(s) previously referred under the EPBC Act or been responsible for undertaking an action referred under the Act.

Alliance is committed to ensuring that the following objectives are met in every phase of the WGIP (construction, operations, closure and post-closure):

1. All activities are undertaken in a manner that is aimed to achieve the objective of 'zero harm'.
2. Legislative compliance with respect to health, safety, the environment and community.
3. The protection of the natural environmental, public safety and amenity.
4. Achievement of the agreed environmental outcomes.

1.3.2.18 If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework

A copy of Alliance's Environmental Policy is provided as Att7_Alliance Env Policy.

1.3.3 Identity: Proposed designated proponent

1.3.3.1 Are the Proposed designated proponent details the same as the Person proposing to take the action? *

Yes

Proposed designated proponent organisation details

ABN/ACN	37095337385
Organisation name	ALLIANCE (EYRE) PTY LTD
Organisation address	Suite 3, 51 - 55 City Road Southbank VIC 3006

Proposed designated proponent details

Name	Steven Gandel
Job title	Chief Executive Officer
Phone	0418151617
Email	steveg@gandelmetals.com.au
Address	Suite 3, 51 - 55 City Road Southbank VIC 3006

1.3.4 Identity: Summary of allocation

Confirmed Referring party's identity

The Referring party is the person preparing the information in this referral.

ABN/ACN	21459872063
Organisation name	The Trustee for Johnston Family Trust T/A Kinesis Projects
Organisation address	8 Rowells Road, Lockleys 5032 SA
Representative's name	Amy Tucker
Representative's job title	Senior Scientist and Stakeholder Engagement Specialist
Phone	0414 917 444
Email	amy@kinesisprojects.com.au
Address	8 Rowells Road

Confirmed Person proposing to take the action's identity

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	37095337385
Organisation name	ALLIANCE (EYRE) PTY LTD
Organisation address	Suite 3, 51 - 55 City Road Southbank VIC 3006
Representative's name	Steven Gandel
Representative's job title	Chief Executive Officer
Phone	0418151617
Email	steveg@gandelmetals.com.au
Address	Suite 3, 51 - 55 City Road Southbank VIC 3006

Confirmed Proposed designated proponent's identity

The Person proposing to take the action is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

1.4 Payment details: Payment exemption and fee waiver

1.4.1 Do you qualify for an exemption from fees under EPBC Regulation 5.23 (1) (a)?

Yes

1.4.2 Select reason for exemption

Small Business

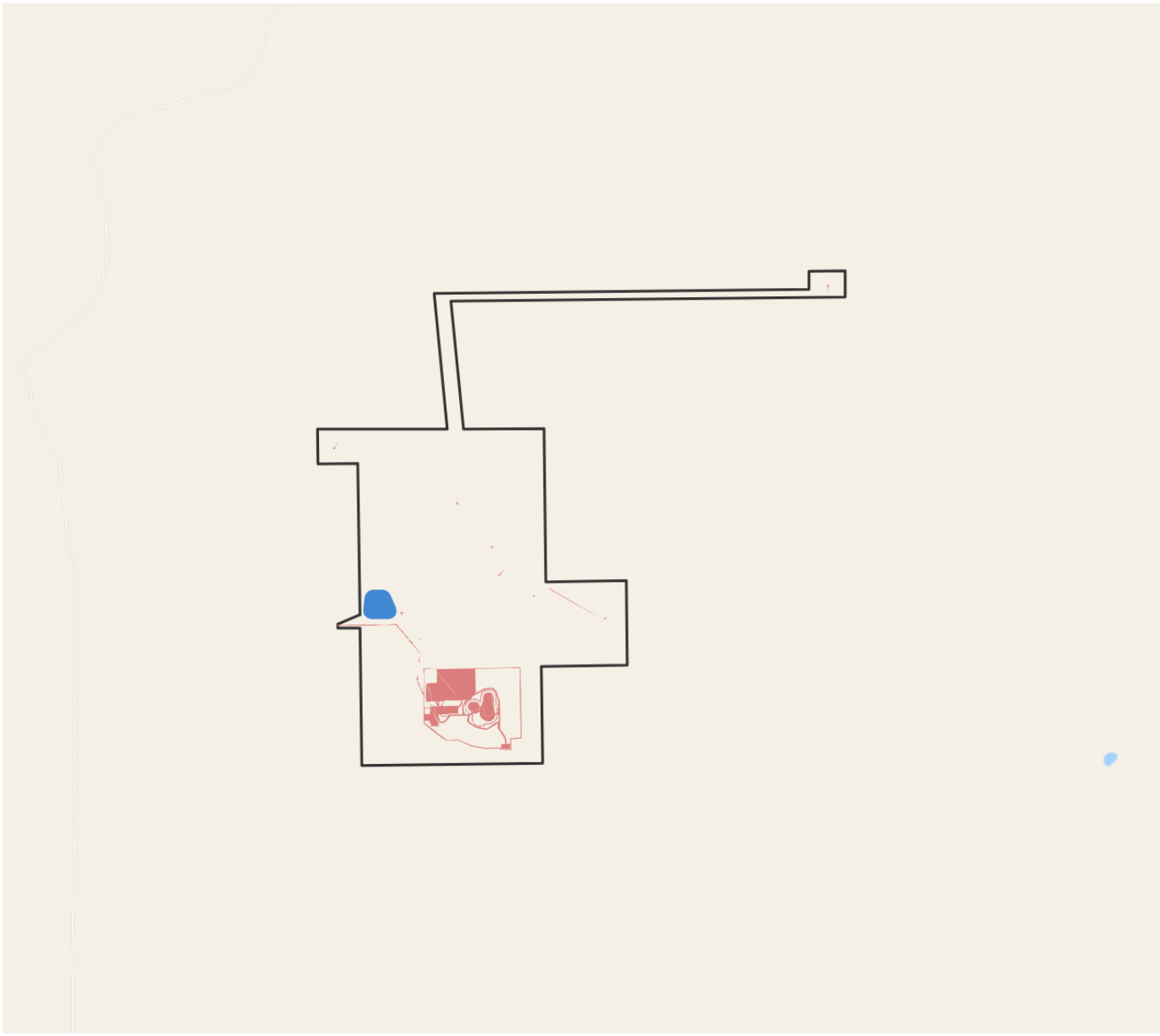
1.4 Payment details: Payment allocation

1.4.11 Who would you like to allocate as the entity responsible for payment?

Person proposing to take the action

2. Location

2.1 Project footprint



Project Area: 4730.62 Ha **Disturbance Footprint:** 182.43 Ha **Avoidance Area:** 51.04 Ha

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

Uno Station, 11.5 km NE of the termination of Drekurmi Road, 40 km north of Kimba, SA

2.2.2 Where is the primary jurisdiction of the proposed action? *

South Australia

2.2.3 Is there a secondary jurisdiction for this proposed action? *

No

2.2.5 What is the tenure of the action area relevant to the project area? *

The mining lease area (MLA) is non-freehold land (Crown Land) held under Pastoral Leases of Uno Station and Nonning Station. Both Pastoral Leases are held by the Nonning Pastoral Company. Mining Lease (ML) 6565 was granted by the SA Department for Energy and Mines (DEM) in August 2025, refer copy of ML 6565 via hyperlink. The MLA is also located within the Gawler Ranges Native Title area.

Att1_WGIP_Map Series, Map 3_Land Parcels and Tenure shows the MLA, exploration licence area, Pastoral Stations, District Council of Kimba area and surrounding conservation areas.

3. Existing environment

3.1 Physical description

3.1.1 Describe the current condition of the project area’s environment.

The Project Area lies within the South Australian Arid Lands (SAAL) Region, which is managed by the SAAL Landscape Board (LMR). From a biodiversity perspective, the Project Area also occurs within the Gawler Bioregion and the Myall Plains subregion. The Project Area supports areas of remnant native vegetation, and land in the immediate vicinity is used for pastoral purposes (primarily sheep grazing). Historically, the area was grazed intensively, and previous land degradation has been associated with overstocking.

The Project Area is dominated by flat sand plains that support mallee communities, alternating between large areas of Western Myall and Black Oak low open woodland. The woodland communities also support shrub layers of variable density and are often dominated by Chenopod low open shrubland. In addition, there is a very small area of open plains with red sandy soils that support Spinifex Hummock Grassland, while open plains with calcareous soils support False Sandalwood low open woodland. Overall, the vegetation in the Project Area is considered to be in moderate to good condition, with limited grazing pressure and minimal weed invasion. Vegetation is more degraded in the areas immediately surrounding existing water supply wells (10-20m buffer), historical exploration areas and water points, transitioning to higher quality vegetation away from these features.

The nearest population centre to the project is Kimba, located approximately 40 km to the south. The nearest regional centre is Whyalla, located 120 km southeast of the Project Area. Adelaide is located approximately 300 km southeast of the Project Area.

The Project Area is located on non-freehold land (Crown Land) held under Pastoral Leases of Uno Station and Nonning Station located on the northern Eyre Peninsula, South Australia. Both Pastoral Leases are held by the Nonning Pastoral Company. The Project Area is zoned Remote Areas and there will be no changes to zoning for this activity. The Project Area is also located within the Gawler Ranges Native Title area.

The land surrounding the Project Area on all sides is zoned Remote Areas and is used for pastoral activities. The land located immediately to the south of the Remote Areas is part of the District Council of Kimba Local Government Area (LGA) and is primarily zoned as Rural and used for cropping.

The Project will make use of a mine access route (the majority of which has already been constructed to a standard suitable for triple road train trucks) linking the project site to Kimba and the Eyre Highway. The mine access route includes Council-maintained (District Council of Kimba) public road, the Drekurmi Road, an existing public access road (PAR) on the pastoral lease of Uno Station and station tracks, collectively referred to as the “Mine Access Road” for this Project. These are existing unsealed roads, designed and constructed by Council for agricultural use and for a previous mining project. These roads are suitable for the transport of materials and product for the Project. These roads will require ongoing maintenance throughout the life of The Project.

A small section of unsealed road (approximately 550 m) will require construction to connect the existing Mine Access Road to the MLA. This section of new road is being constructed to ensure project traffic will be south of Avoidance Area 1 (refer Att1_WGIP_Map Series, Map 5_ Avoidance Areas). After it is constructed, it will form part of the Mine Access Road.

The Mine Access Road from the western boundary of the MLA runs west/south west for approximately 7 km and then turns south for approximately 4 km where it connects to the Drekurmi Road. Drekurmi Road runs approximately 20 km in a southerly direction through agricultural (broad-acre) land towards the township of Kimba, where it intersects with the sealed Buckleboo Road and continues south. After approximately 5.7 km in a south-easterly direction, Buckleboo Road intersects with sealed Tola Road. Product being transported from the mine will turn east at this intersection and travel 3 km east along Tola Road to bypass Kimba and then connect to the Eyre Highway (A1). Personnel travelling to and from the mine site will continue on Buckleboo Road from the Tola Road intersection for an additional 1.5 km before reaching the accommodation village on the western edge of Kimba.

Refer to the WGIP mining application (Alliance 2023), Section 3.13.3, pg 3-165 and Figure 3.13.4 Project-related transport infrastructure and product transport route, pg 3-166 (via hyperlink).

During mine development and construction, personnel will travel in light vehicles and construction equipment/materials will travel via heavy vehicles to and from the Project Area via the route described above. As part of the construction phase a small section (approximately 550 m) of unsealed road will be constructed to connect the existing Mine Access Road to the mining lease area (MLA). This section of new road is being constructed to ensure project traffic will be south of Avoidance Area 1 (refer Att1_WGIP_Map Series, Map 5_ Avoidance Areas). After it is constructed, it will form part of the Mine Access Road.

During mine operations, personnel will travel in a combination of light vehicles and buses to and from the mine site from Kimba via the Buckleboo Road and the Mine Access. Product and equipment/materials will be transported via armoured vehicle (in the case of gold) and trucks/heavy vehicles to and from the mine via the Mine Access Road, Drekurmi Road, Buckleboo Road, Tola Road and the Eyre Highway.

3.1.2 Describe any existing or proposed uses for the project area.

The Project Area is currently used for sheep grazing and is contained within the pastoral leases of Uno Station (119,119 ha) and Nonning Station (298,490 ha). Both pastoral leases are held by the Nonning Pastoral Company. Stocking rates are relatively low and similar to the regional stocking rates. Uno and Nonning stations stock low maintenance Dorper sheep, a cross between the blackhead Persian and the Dorset horn sheep. The Dorper is known for non-selective grazing, coat shedding, general hardiness and rapid growth rates and meat attributes. Other pastoral stations in the region generally stock Merino sheep.

Mining activities have also previously occurred in the Project Area, including exploration for a variety of minerals (including silver, lead, zinc, iron, copper and gold) over the last fifty years. Prior to Alliance acquiring the Wilcherry Weednanna Gold and Iron Project, Ironclad Mining Limited (Ironclad) planned to develop an iron ore mining operation at the same location. The iron ore project was given approval by the SA Government in 2011 and received EPBC approval in 2011 under EPBC 2010/5478; however, it did not proceed due to significant economic challenges at the time.

Alliance has been exploring for gold in the Project Area since 2016 after acquiring 51% of the project. In 2019, Alliance acquired the remaining 49% of the Project, together with the exploration rights for the area. Alliance continues to undertake extensive exploration for gold and other targets in the general Project Area.

The proposed use for the Project Area is the Wilcherry Weednanna Gold and Iron Project (WGIP), a gold and iron ore mine. A mining application was submitted in 2023 to the SA Department of Energy and Mining (DEM) for a mining lease (ML) with an area of approximately 4,716 ha. ML 6565 was granted by DEM in August 2025 (refer copy of tenement document for ML 6565 via hyperlink). The disturbance area associated with mining activities (including construction, operation, and closure/rehabilitation) is approximately 182.3 ha.

The proposed mine will extract and process gold and iron ore. The ore will be crushed, milled, and processed on site; gold bars produced on site will be transported by road in armoured vehicles to Adelaide. The iron ore (dominantly magnetite) will be crushed and screened on site to generate a Direct Shipping quality ore, which will be transported by road via the Eyre Highway to Whyalla and Port Augusta.

3.1.3 Describe any outstanding natural features and/or any other important or unique values that applies to the project area.

The WGIP Project Area is located within the Gawler Rangers Native Title area and the pastoral leases of Uno Station and Nonning Station. At the regional scale, the topography of the Project Area, its immediate surrounds and areas to the south and west are relatively flat. The most elevated areas in this landscape are Wilcherry Hill, in the northwest corner of the Project Area and the group of hills directly south (e.g. Weednanna Hill, Wirrigenda Hill, Yeltana Hill and Muratchina Hill) of the Project Area.

Further afield, the Gawler Ranges, a 40 km to 60 km wide belt regionally running east to west, are located north of the Project Area. Lake Gilles and the Lake Gilles Conservation Park occur 20 km to the east of the Project Area. The Uno Ranges (hills running northwest-southeast) occur between the Gawler Ranges and Lake Gilles.

Refer Att1_WGIP_Map Series, Map 6_ Surrounding Landscape

3.1.4 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

The topography of the Project Area, its immediate surrounds and areas to the south and west, are relatively flat with low undulations and elevations mainly between 250 mAHD and 300 mAHD with a slope direction towards the south east.

Elevation within the Project Area ranges from around 250 m to 300 m above sea level. The most elevated area in the Project Area landscape is Wilcherry Hill, in the northwest corner of the Project Area, at approximately 350m above sea level at its highest point, and the group of hills directly south of the Project Area: Weednanna Hill, Wirrigenda Hill, Yeltana Hill and Muratchina Hill, which stand between 420m and 430m above sea level at their highest points. East of the Project Area, the land gradually slopes down to Lake Gilles, which is situated at approximately 200m above sea level.

Rising to the north of the Project Area are the Gawler Ranges, a 40 km to 60 km wide belt regionally running east to west, with elevations ranging from 150 m to approximately 300 m above sea level. The Uno Ranges (northwest-southeast running hills with elevations of 250 m to 300 m above sea level) sit between the Gawler Ranges and Lake Gilles, approximately 20 km northeast of the Project Area.

The region surrounding the Project Area is generally dry with no natural permanent surface water bodies or drainage lines. Rainfall is generally low, and any drainage through the Project Area is ephemeral sheet flow following significant rainfall events with limited presence of defined drainage channels. There are a number of ephemeral salt lakes in the wider region including Lake Gilles (approximately 20 km east of the Project Area) and Lake Gairdner (approximately 50 km northwest of the Project Area). Both of these lake systems receive runoff from the Gawler Ranges to the west and are terminal systems that contain large reserves of salt.

Stock and domestic water supplies in the region are typically reliant on surface water runoff into dams. Groundwater is rarely relied upon for these types of water supplies in the region primarily as salinity concentrations exceed what can safely be used by humans and stock without some form of treatment.

3.2 Flora and fauna

3.2.1 Describe the flora and fauna within the affected area and attach any investigations of surveys if applicable.

Summary

The Project Area is located within the plains and rises landform of the Gawler Ranges bioregion and is dominated by mallee and myall woodland over chenopod scrub. The Project Area is also located within the pastoral region on the northern Eyre Peninsula. Existing and surrounding land use is dominated by grazing with infrastructure, consisting of homesteads, associated buildings and access roads, scattered across the landscape.

A number of field studies and surveys have been completed for the Project which support the current understanding of vegetation, habitat and existing ecological values of the Project Area. Information on previous studies is provided in the attached Significant Impact Assessment (SIA), refer Att2_WGIP_SIA, Table 1.1, pg 10-12. A summary of each study and report is as follows:

Historical

1. 2008 Flora and Fauna Survey of the IronClad Wilcherry Hill exploration lease (EL3095) area. A baseline biological survey was undertaken to characterise fauna species and habitat types and included:
   a) Desktop reviews of the Biological Databases of South Australia (BDBSA), South Australian Museum Database and Environment Protection and Biodiversity Conservation (EPBC) Database
   b) Detailed field surveys for flora and landscape, fauna (trapping) and cultural significance.
2. 2010 Targeted Threatened Species Study of the IronClad Wilcherry Hill exploration lease (EL3095) area including:
   a) Surveys for key species that were relevant under the EPBC Act at the time
   b) Habitat assessments and vegetation surveys.
3. 2011 Native Vegetation Condition Monitoring of the IronClad Wilcherry Hill exploration lease (EL3095) area. The baseline vegetation monitoring was conducted at control and impact sites along the proposed haul routes.
4. 2013 Additional Targeted Bird Survey of the IronClad Wilcherry Hill mining lease area. Surveys for key bird species that were relevant under the EPBC Act at the time; Malleefowl and Slender-billed Thornbill (now only State-rated at this location).

Recent

1. 2019 - 2022 Targeted EPBC Species and Habitat Assessments of the Alliance mining lease area for the Wilcherry Weednanna Gold and Iron Project, these reports are provided as Att3_WGIP_EcolAssessments. The assessments included:
   a) Detailed reviews of previous studies
   b) Desktop reviews of the BDBSA and EPBC Protected Matters Search Tool (PMST) from the centre of the mining lease area with a 50km buffer
   c) Targeted field assessments that included characterisation of the vegetation for future vegetation clearance approvals and with regards to suitability for the Western Grasswren and Malleefowl (species identified from the EPBC PMST search) as well as general bird surveys.
2. 2025 EPBC Significant Impact Assessment of the Alliance mining lease area for the Wilcherry Weednanna Gold and Iron Project, provided as Att2_WGIP_SIA. To determine key MNES species relevant to the Project Area, a review of previous ecological studies was undertaken, including a review of desktop studies and PMST reports associated with the corresponding reports, as outlined in Section 2.2 of Att2_WGIP_SIA, pg 20-21. It is worth noting over the course of the Project several species listings under the EPBC Act have changed (i.e. listing events, de-listings and listing status changes).

Threatened Species and Ecological Communities

A number of PMSTs have been run for the Project Area, the most recent in March 2025. The EPBC PMST suggested one Threatened Ecological Community (TEC), 29 threatened species and 10 listed migratory species had potential to occur in the study area. However, based on the ecological investigations in the Project Area and surrounds to date, only 5 threatened species are considered likely to occur, or have potential to occur (refer Att2_WGIP_SIA, Section 2.4, pg 22). A summary of the justification is provided below:

- One TEC, Eyre Peninsula Blue Gum (*Eucalyptus petiolaris*) woodland (Endangered) was highlighted in the PMST as may occur within the 50 km buffer on the Project Area. It has not been identified in the Project Area and is considered unlikely to occur.
- Of the 12 EPBC threatened flora highlighted, ten are unlikely to occur, one is possible, but unlikely, one is known. The Yellow Swainson Pea (*Swainsona pyrophila*) was suggested in the PMST as known and suitable mallee habitat exists across the Project Area. Whilst the species can be triggered by disturbance or fire, preferred habitat of deeper sandy dunefields are not present. This species has not been observed to date and was not observed during on-ground surveys. In addition, given the widespread grazing across the mining lease area, existing disturbance (and rehabilitation) for exploration activities, and extended periods without fire, it is considered unlikely to occur within the Project Area. One individual Nodding Rufoushood (*Pterostylis mirabilis*) was detected in 2019, but despite targeted searching it was not observed in September 2022 (peak detectability is May to December) or during the on-ground vegetation surveys. No other orchids have been detected during any historical surveys at the site. The individual orchid was located in Western Myall over Pearl Bluebush, which is not considered the preferred or known habitat for the species, and it was considered unlikely to persist, particularly in heavily grazed areas. Regardless, the location is distant from proposed Disturbance Footprint and will not be impacted by the Project.
- Of the 17 EPBC threatened fauna highlighted in the PMST, twelve are unlikely to occur, including two species which have not been highlighted in the PMST previously; Flinders Ranges Worm-lizard (*Aprasia pseudopulchella*) and Common Greenshank (*Tringa nebularia*). These species have no suitable habitat within Project Area, and no records within 50 km. Flinders Ranges Worm-Lizard records have a stronghold east of the Eyre Peninsula on along the Flinders Ranges and near Burra, distant from the Project Area. Common Greenshank, a migratory shorebird, are widespread and may occur in dams or Lake Gilles when water is present, dams in the Project Area are heavily grazed and unsuitable.
- Two EPBC threatened fauna species are considered to possibly occur; Blue-winged Parrot (*Neophema chrysostoma*) and Malleefowl (*Leipoa ocellata*). The Blue-winged Parrot does not breed in inland South Australia, but will forage inland (March to September), favouring open country, sand dunes, mallee and acacia shrublands. Whilst there are no records within 50 km of the Project Area, there are records inland further northeast of the project and there is suitable habitat, hence the have potential to occur during the inland migration period. Malleefowl prefer mallee habitats with litter for foraging and litter over deeper sands for nesting. There are limited previous records within 50km of the Project Area (37 to 43 km away), which is on the northern edge of the species range that spans from WA to Victoria / NSW. Suitable foraging habitat, and limited nesting habitat occurs within the Project Area and there are not records within the Project Area. The species has not been detected during previous surveys in the Project Area (refer Att2_WGIP_SIA, Table 3.1, pg 27-32). Based on the above, Malleefowl is only considered to potentially occur in the Project Area.
- Two EPBC listed threatened species are known to occur in the Project Area; Southern Whiteface (*Aphelocephala leucopsis*) and Western Grasswren (*Amytornis textilis myall*), both listed as Vulnerable. Both species were detected in small numbers (2 Western Grasswren, small group of Southern Whiteface) in similar Western Myall over Chenopod habitat along the access road in areas that will be avoided by disturbance.
- The PMST highlighted 10 Migratory species with potential to occur in the Study Area. Of these 10 species, 4 are also listed as threatened and were addressed in the likelihood of occurrence and SIA discussed above; Latham’s Snipe, Curlew Sandpiper, Common Greenshank and Sharp-tailed

Sandpiper. There is no suitable wetland or shorebird habitat or records for these species in the Project Area or Disturbance Footprint. The species are not expected to be permanent residents in the area, they may be occasional overfly or visitors at best, but only if low lying water is present, more likely to visit regional aquatic habitats. As such, significant impacts to these species, as a result of the Project, are unlikely to be significant. Similarly, the impacts for the remaining 6 migratory species are also not likely to be significant. The Fork-tailed Swift is an aerial species, and there are no suitable aquatic habitats for Grey or Yellow Wagtail, or 3 shorebirds (Oriental Plover, Common Sandpiper, Pectoral Sandpiper), refer to Att2_WGIP_SIA, Table 6.2, pg 85-86.

Refer Att2_WGIP_SIA, Table 3.1, pg 27-32 for species likelihood of occurrence for EPBC listed species in the Project Area.

Refer Att2_WGIP_SIA, Table 4.1, pg 36-37 for survey effort against DCCEEW guidelines.

Weeds and Pests

Few introduced species were found throughout the vegetation survey sites, however weed species noted on the pastoral lease area by the landholder included Horehound (*Marrubium vulgare*), Saffron thistle (*Carthamus glaucus*), Apple of Sodom (*Solanum linneanum*), Spearthistle (*Cirsium vulgare*), Wards weed (*Carrichtera annua*), and Tree Tobacco (*Nicotiana glauca*). Refer to the WGIP mining application (Alliance 2023), Section 3.8.6, pg 3-128 (via hyperlink).

Four herbivore pests have been recorded on the mining lease area: sheep (*Ovis aries*), goats (*Capra hircus*), hares (*Lepus europeans*) and rabbits (*Oryctolagus cuninculas*). Two predator pest species were recorded in the area, cats (*Felis catus*) and foxes (*Vulpes vulpes*). Refer to the WGIP mining application (Alliance 2023), Section 3.9.2, pg 3-143.

3.2.2 Describe the vegetation (including the status of native vegetation and soil) within the project area.

Approximately 4727 hectares (ha) of remnant native vegetation is mapped as occurring within the Project Area, noting that this does not discreetly exclude all existing disturbed areas (e.g. pastoral tracks, dams, exploration tracks). The proposed disturbance area includes intact areas as well as areas previously disturbed during exploration. Two constructed farm dams occur within the mining lease area (Weednanna Dam on the southern boundary and Ultima Dam in the centre of the Project Area). Farm tracks are present throughout, and there are minor tracks to existing water supply wells. Overall, the vegetation in the Project Area is considered to be in moderate to good condition, with limited grazing pressure and minimal weed invasion. Vegetation is more degraded in the areas immediately surrounding existing water supply wells (10-20m buffer), historical mineral exploration areas and water points, transitioning to higher quality vegetation away from boreholes (refer Att2_WGIP_SIA, Section 1.5, pg 14-17).

Broadly vegetation within the Project Area is classified as comprising the following:

- Mallee (~ 3217 ha) (includes degraded regrowth
  - Red Mallee (*Eucalyptus oleosa*) / Yorrell (*E. gracilis*) +/- Boree (*Melaleuca pauperiflora ssp. mutica*) open mallee
  - Boree / Red Mallee low open woodland over chenopods.
  - Red Mallee open mallee over Bluebush Daisy (*Cratystylis conocephala*) with Black Oak (*Casuarina pauper*) / Pearl Bluebush (*Maireana sedifolia*)
  - Red Mallee open mallee over Pearl Bluebush +/- Bluebush Daisy
  - Mixed degraded regrowth Red Mallee over mixed chenopods +/- Spinifex (*Triodia irritans*) / Western Myall (*Acacia papyrocarpa*)
  - Black Oak +/- Western Myall +/- Red Mallee open woodland with shrubby understorey (grouped given very small mapping unit)
- Western Myall / False Sandalwood woodlands (~1470 ha)
  - Western Myall woodland over Bluebush Daisy / Intricate Saltbush (*Rhagodia ulicina*)
  - Western Myall low woodland over Pearl Bluebush +/- Bladder Saltbush (*Atriplex vesicaria*)
  - Western Myall over tall shrubland
  - False Sandalwood / Western Myall low open woodland
- Spinifex Hummock Grassland (~13 ha)
  - Porcupine Grass (*Triodia irritans*) hummock grassland
- Chenopod Shrubland (~27 ha)
  - Pearl Bluebush / Intricate Saltbush +/- Samphire sp. (Tecticornia sp.) / Bladder Saltbush.

Refer Att3_WGIP_EcolAssessments (#2 MEM), Section 3.2.1, pg 14-23 for further detail about the vegetation of the Project Area.

A summary of the Disturbance Footprint is provided in Att2_WGIP_SIA, Table 1.3, pg 18.

The most common soils within the Project Area are highly calcareous loams over clay (found in the western portion) and loamy sands over red clay on rock (found in the eastern portion) with topsoils of up to 35cm depth. These types of soil have low to moderate potential for erosion when vegetated. Where slopes are long, considerable runoff may be generated from non-wetting topsoils. Wind erosion susceptibility is low to moderate due to soft sandy to silty surface.

Very shallow soils on rock occur in the central portion of the Project Area where the basement has near-surface expression. Water erosion potential is low to moderate, by sheet wash, creep or water aided mass movement, particularly on slopes steeper than 4%. Wind erosion susceptibility is low where rock mulch and vegetation cover is high, but moderate where cover is sparse.

Dominant soil types within the Project Area are described in the WGIP mining application, Section 3.3.3, pg 3-18 and Table 3.3.1, pg 3.19 (via hyperlink).

There is a low probability that acid sulfate soils occur within the Project Area (refer to the WGIP mining application, Section 3.3.4, pg 3-23).

3.3 Heritage

3.3.1 Describe any Commonwealth Heritage Places Overseas or other places recognised as having heritage values that apply to the project area.

There are no Commonwealth Heritage places or other (non-Indigenous) places recognised as having heritage values that apply to the Proposed Action. Refer to the WGIP mining application for description of heritage places, Section 3.18.2, pg 3-183 (via hyperlink).

3.3.2 Describe any Indigenous heritage values that apply to the project area.

The native title holders over the Project Area are the Gawler Ranges People, who represent a collaboration between the Kokatha and Barngarla People. The Gawler Ranges Aboriginal Corporation (GRAC) was incorporated on the 16 December 2011 and administers land on behalf of the Gawler Ranges People.

Proponents of a mining development are required to request a search of Aboriginal Heritage sites listed in the Central Archive managed by the Aboriginal Affairs and Reconciliation (AAR) of the SA Department of Premier and Cabinet. A search of the Register of Aboriginal Sites and Objects showed that there are no entries for Aboriginal sites within the mining lease area (including a 250m buffer) (refer to Att5_AAR Search Results, pg 1).

Cultural heritage searches and surveys have been undertaken in the Project Area and significant consultation has taken place between Alliance and GRAC as holders of native title. This culminated in the signing of a Native Title Mining Agreement (NTMA) that includes compensation and heritage management arrangements. A NTMA was registered with DEM on 27 October 2022. For note, details of cultural heritage surveys are confidential and cannot be provided by Alliance. Permission to view these must be sought directly from GRAC.

Summary Cultural Heritage Sites within the Project Area

Seven of the site locations identified in the cultural heritage survey are located within or on the boundary of the Project Area. All sites are connected to a Seven Sister's Dreaming story and song line.

Due to the culturally sensitive nature of this knowledge for both Aboriginal men and women, exact details and locations of these places cannot be included in this section. A brief observation of each site relevant to the Project is provided below.

- Site 1: a large scattering of quartz material which is a highly significant dreaming place due to the relationship with a Dreaming path and song line. A scattering of stone artefacts was also identified in this area.
- Site 2: an ancestral living area. A number of significant trees, including black oak, were also situated in this area. These trees form part of the Dreaming track. There was also a scatter of quartz artefacts in this area.
- Site 3: a highly significant Dreaming place that forms an important part of the song line. This site is also highly significant due to containing a number of rock holes in the area, which are important sources of water. This area contained four small rock holes with one large rock hole also identified. A large artefact scatter was also identified in this area.
- Site 4: an extensive series of boulders and smaller rock protruding from the ground which has significance in association with the Seven Sister's Dreaming story and song line.
- Site 5: an extensive series or boulders and smaller rocks with significance as a women's Dreaming site.
- Site 6: was a photo point of an area that was later determined to be non-significant.
- Site 7: a highly significant Dreaming place associated with a song line.

Other sites were identified during the cultural heritage survey but fall outside of the currently proposed Project Area.

During cultural heritage surveys, and through discussions with male and female representatives of GRAC, a series of exclusion zones and heritage management conditions were established and will be implemented by Alliance.

3.4 Hydrology

3.4.1 Describe the hydrology characteristics that apply to the project area and attach any hydrological investigations or surveys if applicable. *

The majority of the Project Area is located in the north-western portion of the closed Lake Gilles water catchment system, which drains towards Lake Gilles in the southeast. Lake Gilles is a narrow, approximately 70 km long, terminal salt lake which acts as the main surface and groundwater discharge feature for this catchment.

Surface water

The Project Area has no permanent natural water bodies however, there are a number of ephemeral salt lakes: Lake Gilles approximately 20 km east of the Project Area, and Lake Gairdner, approximately 50 km northwest of the Project Area. Both of these lake systems receive runoff from the Gawler Ranges to the west and are terminal systems that contain large reserves of salt.

Rainfall events sufficient to result in runoff are erratic, usually associated with low pressure cells moving northeast across the Eyre Peninsula. Sub-catchments within the proposed mining lease area indicate surface water flows from the west (from Wilcherry Hill and Weednanna Hill) in an easterly direction (refer Att6_WGIP_Water Studies, pg 7). There are two constructed ephemeral surface water bodies (stock dams) within the Project Area; Weednanna Dam is located on the southern boundary and Ultima Dam is located in the centre of the Project Area. A further 13 dams are within a 10 km radius of the Project Area, however, even the large dams dry out on occasion due to low rainfall in the area.

No Ramsar Wetlands occur on the Eyre Peninsula or within the vicinity of the Project (refer to Att6_WGIP_Water Studies, pg 6).

Groundwater

The geology in the area is dominated by the basement rocks of the Gawler Craton which underlie the whole study area. These basement lithologies are mantled by a thick weathered zone of kaolinised saprolite clay. Overlying the saprolite clay are Cenozoic sediments of variable thickness. The three hydrostratigraphic units (HSUs) relevant to the Project Area can be summarised as follows (refer to Att6_WGIP_Water Studies, pg 3):

1. Tertiary and quaternary sediments consisting of aeolian sand, Pleistocene gravel, clay and silt, Pooraka Formation (silty clays). This HSU is unsaturated in the Project Area with a thickness of 0 – 2 m.
2. Saprolite consisting of weathered basement. This HSU is an aquitard with a thickness of approximately 50 m regionally, and thinner within the Project Area.
3. Fractured rock consisting of basement suites including Donnington Suite, Gawler Range Volcanics, Hutchinson Group, Sleaford Complex, Lincoln Complex, Lower Middleback Jaspillite, Hiltaba Suite. This HSU is a confined/semi-confined aquifer with a thickness greater than 100 m. Groundwater supplies for the Project Area will be drawn from existing water supply wells that within this HSU.

Groundwater levels are almost exclusively deeper than 5 m below ground level, indicating minimal interactions with surface water environments. There has been no significant temporal change in groundwater levels between 2010 and 2024. Groundwater salinities within the fractured rock system range from 25,000 – 35,000 mg/L (refer to Att6_WGIP_Water Studies, pg 4).

The Project Area is located in a semi-arid to arid climate with relatively low groundwater recharge. Groundwater is generally deep and saline and flows towards the east from the site (refer to Att6_WGIP_Water Studies, pg 5). Groundwater flow predominantly occurs through fractures in basement rocks (the primary aquifer), with areas of greater fracturing resulting in higher permeability.

The Proposed Action is not within an area where the water resources are prescribed.

4. Impacts and mitigation

4.1 Impact details

Potential Matters of National Environmental Significance (MNES) relevant to your proposed action area.

EPBC Act section	Controlling provision	Impacted	Reviewed
S12	World Heritage	No	Yes
S15B	National Heritage	No	Yes
S16	Ramsar Wetland	No	Yes
S18	Threatened Species and Ecological Communities	Yes	Yes
S20	Migratory Species	No	Yes
S21	Nuclear	No	Yes
S23	Commonwealth Marine Area	No	Yes
S24B	Great Barrier Reef	No	Yes
S24D	Water resource in relation to large coal mining development or coal seam gas	No	Yes
S26	Commonwealth Land	No	Yes
S27B	Commonwealth Heritage Places Overseas	No	Yes
S28	Commonwealth or Commonwealth Agency	No	Yes

4.1.1 World Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.1.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.1.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

There are no World Heritage Properties within or near the Proposed Action (confirmed via the EPBC Act Protected Matters Report, March 2025) (refer Att2_WGIP_SIA, Appendix A). The nearest World Heritage Site is the Willandra Lakes Region in NSW, located approximately 600 km to the east from the Proposed Action.

4.1.2 National Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.2.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.2.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

There are no National Heritage Places within or near the Proposed Action (confirmed via the EPBC Act Protected Matters Report, March 2025) (refer to Att2_WGIP_SIA, Appendix A).

The nearest national heritage place is the Ediacara Fossil Site in Nilpena which is located approximately 230 km northeast of the Proposed Action on the eastern side of Lake Torrens.

4.1.3 Ramsar Wetland

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.3.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.3.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

There are no Wetlands of International Importance (Ramsar Wetlands) within or in close proximity to the Proposed Action (confirmed via the EPBC Act PMST reports (refer to Att2_WGIP_SIA, Appendix A). The nearest Ramsar wetland is the Coorong and Lakes Alexandrina and Albert located approximately 350 km south south-east from the Proposed Action.

4.1.4 Threatened Species and Ecological Communities

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Threatened species

Direct impact	Indirect impact	Species	Common name
No	Yes	Amytornis textilis myall	Western Grasswren (Gawler Ranges)
No	Yes	Aphelocephala leucopsis	Southern Whiteface
No	No	Caladenia tensa	Greencomb Spider-orchid, Rigid Spider-orchid
No	No	Calidris acuminata	Sharp-tailed Sandpiper
No	No	Calidris ferruginea	Curlew Sandpiper
No	No	Falco hypoleucos	Grey Falcon
No	No	Gallinago hardwickii	Latham's Snipe, Japanese Snipe
No	No	Hibbertia crispula	Ooldea Guinea-flower
No	No	Leipoa ocellata	Malleefowl
No	No	Limosella granitica	Granite Mudwort
No	No	Neophema chrysostoma	Blue-winged Parrot
No	No	Pedionomus torquatus	Plains-wanderer
No	No	Pterostylis mirabilis	Nodding Rufoushood
No	No	Pterostylis xerophila	Desert Greenhood
No	No	Rostratula australis	Australian Painted Snipe
No	No	Sminthopsis psammophila	Sandhill Dunnart
No	No	Stagonopleura guttata	Diamond Firetail
No	No	Swainsona pyrophila	Yellow Swainson-pea

Ecological communities

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4.1.4.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.4.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

Threatened Ecological Communities (TECs)

No Impacts Expected

The PMST report (refer Att2_WGIP_SIA, Appendix A) suggested the Eyre Peninsula Blue Gum (*Eucalyptus petiolaris*) Woodland TEC may occur within the 50km buffer area only. The TEC is a woodland with canopy dominated by Eyre Peninsula Blue Gum (*Eucalyptus petiolaris*), known to occur with sheltered valleys and lower hill slopes and along watercourses on the Eyre Peninsula of SA. These landform features do not occur within the Project Area and the TEC has not been identified during any of the on-ground surveys. The TEC is therefore considered unlikely to occur. Refer Att2_WGIP_SIA, Table 3.1, pg 27-32.

It is considered that there will be no direct or indirect impact to the Eyre Peninsula Blue Gum (*Eucalyptus petiolaris*) Woodland TEC (or any TECs) as a result of the Proposed Action.

Listed Threatened Flora Species

No Significant Impacts Expected

12 EPBC listed threatened flora species were identified in the recent PMST report for the Project Area and Study Area (50 km buffer around the Project Area) (refer Att2_WGIP_SIA, Appendix A) and assessed for likelihood of occurrence in the Project Area, Disturbance Footprint, and potential for significant impacts as a result of the Action.

Endangered species include:

- Jumping-jack Wattle (*Acacia enterocarpa)*
- Greencomb Spider-orchid, Rigid Spider-orchid (*Caladenia tensa*)
- *Frankenia plicata*
- Hale Dwarf Greenhood (*Pterostylis sp. Hale (R.Bates 21725)*)

Vulnerable species include:

- Neat Wattle, Resin Wattle (SA) (*Acacia rhetinocarpa*)
- Winter Spider-orchid (*Caladenia brumalis*)
- Ooldea Guinea-flower (*Hibbertia crispula*)
- Granite Mudwort (*Limosella granitica*)
- Silver Daisy-bush, Silver-leaved Daisy, Velvet Daisy-bush (*Olearia pannosa subsp. pannosa*)
- Nodding Rufoushood (*Pterostylis mirabilis)*
- Desert Greenhood (*Pterostylis xerophila*)
- Yellow Swainson-pea (*Swainsona pyrophila)*

11 of the 12 species were considered unlikely to occur based on a lack of suitable habitat in the Project Area and limited or no records in the surrounding 50 km area around the Project Area. These species were also not detected during vegetation and habitat surveys within the Project Area (refer Att2_WGIP_SIA, Table 1.1, pg 10-12).

It is therefore considered that there will be no direct or indirect impact to 11 of the 12 flora species as a result of the Proposed Action.

Nodding Rufoushood was detected in the Project Area and is therefore considered known to occur. 1 individual was detected in 2019, but despite targeted searching it was not observed in September 2022 (peak detectability is May-December) or during the on-ground vegetation surveys. The individual plant was located in Western Myall over Pearl Bluebush, which is not considered the preferred or known habitat for the species, and it was considered unlikely to persist, particularly in heavily grazed areas. The location is distant from the Disturbance Footprint and will not be impacted by the Project. Refer Att2_WGIP_SIA, Table 3.1, pg 27-32. The location of the isolated individual will be avoided through establishment of Avoidance Area 2 (refer Att1_WGIP_Map Series, Map 5_ Avoidance Areas).

It is considered that there will be no direct or indirect impact to the Nodding Rufoushood as a result of the Proposed Action.

Listed Threatened Fauna Species – Overview

No significant impacts expected

Several EPBC listed threatened fauna species were identified in the PMST (Att2_WGIP_SIA, Appendix A) as either potentially occurring or present in the Project Area which may potentially be impacted by the Action. Att2_WGIP_SIA, Table 3.1, pg 27-32 provides an assessment of the likelihood of occurrence of each of these threatened fauna species, a review of historic records, desktop findings and in-field assessments and an assessment of the potential impacts arising from the Action by addressing the Commonwealth Significant impact Criteria. Only 4 species (birds) are considered likely to be, or potentially present in the Project Area.

Listed Threatened Birds

Western Grasswren (Gawler Ranges) (*Amytornis textilis myall*) - *Vulnerable*

No significant impacts expected

Western Grasswren is considered known in the Project Area (refer to Att2_WGIP_SIA, Table 4.1, pg 36-37. There are 57 (43 recent) BDBSA records within 50 km of the Project Area, and 3 records of the species within the Project Area, recorded during the 2008 survey at 3 sites, a highly probable sighting in 2019 and a definite sighting of two individuals in 2022. The 2019 and 2022 detections were both at the same site as the 2008 survey, which is adjacent an existing station track, suggesting the species can persist through ongoing agricultural and exploration activities in the Project Area. They have not been detected in the Mallee habitats at the site. The location where they are known to occur, whilst not within the Disturbance Footprint, will be protected through the establishment of Avoidance Area 1 (refer Att1_WGIP_Map Series, Map 5_ Avoidance Areas). The majority (69%) of the Project Area is considered to be not suitable habitat for the species (3,286 ha). The disturbance footprint represents 6.8 ha (approximately 0.14% of the Project Area) of what is considered to be atypical (suitable) habitat. No preferred habitat has been identified in the Project Area, i.e. habitat characterised by Black Bluebush low shrubland, Australian Boxthorn low shrubland and Western Myall low woodland along drainage lines or near artificial water points, refer Att1_WGIP_Map Series, Map 8_Project Area Western Grasswren Habitat Mapping.

Potential direct and indirect impact pathways relevant to this species are:

- Clearance of potential Western Grasswren habitat (via vegetation clearance)
- Introduction of invasive weed species or pests impacting potential habitat
- Increased level of weed species or disease impacting on potential habitat
- Injury/mortality from collisions with vehicles
- Increased feral animal predation or competition.

Southern Whiteface (*Aphelocephala leucopsis*) - Vulnerable

No significant impacts expected

The Southern Whiteface is considered known to be present in the Project Area (refer Att2_WGIP_SIA, Table 3.1, pg 30). There are 18 BDBSA records (2006-2019) and 18 Birdlife records (1999-2019) of the species within 50 km of the Project Area. The species was detected during targeted surveys of the Project Area in October 2019 (1 site, several birds on 3 occasions) and in September 2022 (at 3 sites). The species was also recorded in historical surveys in mallee over chenopod habitats (refer Att2_WGIP_SIA, Table 4.1, pg 36-37 and Att3_WGIP_EcolAssessments (#3 Cover letter), pg 2). Given the broad definition of suitable habitat for the Southern Whiteface, all of the Project Area is conservatively considered to be suitable habitat for the species (refer Att1_WGIP_Map Series, Map 9_Project Area Southern Whiteface Habitat Mapping).

Potential direct and indirect impact pathways relevant to this species are:

- Clearance of potential habitat for proposed infrastructure creating a loss of potential general foraging habitat, and or temporary roosting habitat
- Injury/mortality from collisions with vehicles
- Introduction of invasive weed species or disease impacting on habitat
- Increased feral animal predation or competition.

Malleefowl (*Leipoa ocellata*) - Vulnerable

No significant impacts expected

Malleefowl is considered as possibly occurring in the Project Area (refer Att2_WGIP_SIA, Table43.1, pg 37). There are 16 BDBSA records, of which 6 (2003-2014) were within 50 km of the Project Area, but none within 5 km of Project Area. Mallee habitat within the Project Area is only considered suitable for foraging (refer Att2_WGIP_SIA, Table 4.1, pg 37 and Att1_WGIP_Map Series, Map 10_Project Area Malleefowl Habitat Mapping). The depth of litter is suitable in some areas, but the lack of deep sand underneath is not considered suitable for creation of Malleefowl mounds and successful breeding. 3 Malleefowl inactive/disused mounds were identified approximately 6 km west of the Project Area during historical surveys. 2 of the 3 mounds had fresh tracks at the time of the 2008 surveys. No further evidence of Malleefowl was found during targeted species surveys in 2010 (2 inactive mounds, no tracks detected), vegetation monitoring in 2011 or searches during RAM assessments of the Project Area in 2019 and 2022. Suitable habitat exists to the west of the Project Area in the vicinity of the identified mounds (approximately 6 km west of the Project Area (refer Att3_WGIP_EcolAssessments, (#1 Targeted Survey) Figure 3-1, pg 34).

Potential direct and indirect impact pathways relevant to this species are:

- Clearance of potential foraging habitat
- Injury/mortality from collisions with vehicles
- Introduction of invasive weed species or disease impacting on potential habitat
- Increased feral animal predation or competition.

Blue-winged Parrot *(Neophema chrysostoma)* - Vulnerable

No significant impacts expected

Blue-winged Parrot is considered as possibly occurring in the Project Area, only during its inland, non-breeding winter migration (foraging and temporary roosting only). There are suitable occasional foraging/roosting habitats in the Project Area that would support the species if present during winter migration, such as Chenopod Shrubland, Western Myall open woodlands, Mallee and Spinifex hummock grassland. These are general non-critical habitats and are extensive across the broader region. No breeding habitat is present and the species does not breed in SA (refer to Att2_WGIP_SIA, Table 4.1, pg 37, Att1_WGIP_Map Series, Map 11_Project Area Blue-winged Parrot Habitat Mapping).

Potential direct and indirect impact pathways relevant to this species are:

- Clearance of potential winter migration foraging or temporary roosting habitat
- Injury/mortality from collisions with vehicles
- Introduction of invasive weed species or disease impacting on potential habitat
- Increased feral animal predation or competition.

4.1.4.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact? *

No

4.1.4.6 Describe why you do not consider this to be a Significant Impact. *

Att2_WGIP_SIA, Table 3.1, pg 27-32 provides a comprehensive description of the likelihood of occurrence of species potentially present through a review of historic records, desktop findings, in-field assessments, and provides an assessment of the potential impacts from the Proposed Action by addressing the Commonwealth Significant impact Criteria.

The assessment of the Action against all potentially relevant MNES has demonstrated that the Action is unlikely to have a significant impact on any threatened species or ecological community. There is the potential for minor impacts to 5 threatened species, 2 of which have not been confirmed as present within the Project Area:

1. Nodding Rufoushood - one recorded in 2019, no further records subsequently
2. Southern Whiteface - confirmed present
3. Western Grasswren - confirmed present
4. Malleefowl - potentially present
5. Blue-winged Parrot - potentially present

Nodding Rufoushood

The species is known from 12 discrete locations on the Eyre Peninsula in SA, with an estimated area of 190 km2 (19,000 ha) thought to comprise about 220 plants. The species occurs in coastal areas and up to 100 km inland between Kimba and Cleve, and all known populations are located on private property. The species primarily occurs among rocks on hilly slopes in Broombush scrub, but will also occur in callitris and eucalypt woodland on brown stony loams and rocky mallee heathland, and eucalypt associations including Ridge-fruited Mallee (*Eucalyptus incrassata*), Beaked Red Mallee (*E. socialis*) mid mallee woodland over Broombush tall shrubland. These habitats are not present in the Project Area. Refer Att2_WGIP_SIA, Section 5.1, pg 39-40.

During the 2019 survey one individual plant was recorded located in the northeast corner of the Project Area in grazed chenopod low open shrubland with emergent Western Myall on the edge of Western Myall woodland over Bluebush Daisy / Intricate Saltbush +/- Pearl Bluebush, which is not the typical habitat for the species. It has not been recorded again, despite several on-ground surveys, and the presence of an important population of the species is considered highly unlikely.

Clearance of up to 0.55 ha of the habitat type where the species was recorded represents approximately 0.003% of the species' EOO (19,000ha). At most clearance for the Project is 157.7 ha (known record and low suitability habitat), which represents 0.83% of the specie's EOO. Taking into consideration the species has only been recorded on one occasion within the Project Area in atypical habitat and is not in the Disturbance Footprint, impacts are not considered to be ecologically significant to this species. The area where this orchid was detected will be avoided (refer Att1_WGIP_Map Series, Map 5_ Avoidance Areas). **Significant impacts to the species as a whole as a result of the Proposed Action are not expected.**

Western Grasswren

The threatened species advice suggests all populations of the Western Grasswren are considered to have high conservation value. More recently, the Action Plan for Australian Birds and IUCN assessments data suggest there is a single population of approximately 10,000 individuals. This population is known to extend west to northwest of Whyalla for approximately 170 km, and includes the Project Area. It is thought that approximately 20% of the Western Grasswren population occurs within the Department of Defence (DoD) Cultana Training Area near Whyalla. The individuals detected in the Project Area would be considered part of small family groups towards the western edge of the entire population which spans over 170 km.

The Conservation Advice for the species suggests the SA population has an AOO of 600 km2 (60,000 ha). More recent estimates in the Action Plan for Australian Birds suggest that the AOO for the SA population is 760 km2 (76,000 ha) and the Extent of Occurrence (EOO) is 19,000 km2 (1,900,000) ha. Refer Att2_WGIP_SIA, Section 5.2, pg 48-49.

The permanent clearance of approximately 6.8 ha of suitable habitat within the Project Area represents 0.01 % of the species AOO (76,000 ha). A further 170 ha of primarily mallee habitat (mapped as not suitable), which is not a known habitat associated with the species, represents 0.2 % within the species AOO. The location where the species has previously been detected on the western side of the Project Area will be avoided (refer Att1_WGIP_Map Series, Map 5_ Avoidance Areas) and is contiguous with vast areas of similar atypical, but suitable habitat. There is no highly preferred habitat in the Project Area, i.e. habitat characterised by Black Bluebush low shrubland, Australian Boxthorn low shrubland and Western Myall low woodland along drainage lines or near artificial water points. Based on the above and with the implementation of mitigation measures (including the establishment of an Avoidance Area around where the species was recorded), **the long-term impact from the direct clearance of up to 6.8 ha of atypical/suitable (but not highly preferred habitat) is considered negligible**.

Southern Whiteface

There are two subspecies of Southern Whiteface; South-west Southern Whiteface (*A.l. castaneiventris*), occurs in central and southern WA and South-east Southern Whiteface (*A. l. leucopsis*) occurs in eastern WA to southern NT, southern Qld all of SA and NSW, and northern Vic. The latter subspecies is considered to have the larger more stable estimated population of the two (400,000 individuals).

The entire species' AOO is 7,000,000 ha across an EOO of 419,000,000 ha. The AOO estimate for the South-east subspecies is 6,000,000 ha within an EOO of 380,000,000 ha. From a bioregional perspective the Gawler IBRA Bioregion AOO for the species is 375,600 ha (within an EOO of 15,085,800 ha). Refer Att2_WGIP_SIA, Section 5.3, pg 58-59.

Vegetation mapping undertaken for the Project Area suggests the majority of the area would be considered suitable for Southern Whiteface nesting, foraging or roosting (i.e. undisturbed open woodland or tall shrubland with grasses and/or dense litter cover, or trees or shrubs supporting hollows) (refer Att1_WGIP_Map Series, Map 9_Project Area Southern Whiteface Habitat Mapping). Individuals present are expected to be part of the broader population across arid SA, rather than any specific important population. Clearance of up to 182.3 ha of potentially suitable habitat (within a broader Project Area of 4727 ha) represents approximately 0.05% of the species' AOO within the Gawler IBRA Bioregion, and a substantially smaller portion of the entire AOO. Locally, individuals of the species would be expected to move into vast areas of suitable habitat to the north, east and west of the Project Area. **Significant impacts to the species as a whole as a result of the Action are not expected.**

Malleefowl

Malleefowl is wide-ranging in mallee dominant habitats, and associated adjoining habitats such as dense acacia shrublands, Scrub Pine (*Callitris verrucosa*), Broombush (*Melaleuca uncinata*) (for foraging). Deep sandy soils and abundance of leaf litter are required for breeding/nesting.

No specific important populations have been defined for the species with all populations considered equally important. The AOO for the species is most recently estimated at 5,000,000 ha. Refer Att2_WGIP_SIA, Section 5.4, pg 67-68.

Permanent clearance of approximately 182.3 ha of mallee and adjacent Acacia habitats represents 0.004 % of the species AOO (5,000,000 ha). Given the extremely broad distribution of Malleefowl across much of Australia, limited previous records within the Study Area and presence of only suitable foraging habitat (but not suitable nesting habitat, refer Att1_WGIP_Map Series, Map 10_Project Area Malleefowl Habitat Mapping), the Malleefowl is considered to potentially occur within Mallee habitats that occur within the Project Area. Disturbance estimates provided above are highly conservative, as is the AOO of 5,000,000 ha. With no confirmed records of the species within the Project Area, **long-term significant impacts to the Malleefowl, as a result of the Disturbance Footprint and activities associated with the Proposed Action, are considered negligible.**

Blue-winged Parrot

Blue-winged Parrots breed on mainland Australia south of the Great Dividing Range in southern Vic and sometimes in the far south-east of SA. During non-breeding periods (from Autumn to early Spring), they occur from northern Vic, eastern SA, south-western Qld and western NSW. Refer Att2_WGIP_SIA, Section 5.5, pg 76.

The Blue-winged Parrot has not been detected within 50 km of the Project Area. There are suitable occasional foraging habitats in the Project Area that would support the species if present during winter migration (March to September) (refer Att1_WGIP_Map Series, Map 11_Project Area Blue-winged Parrot Habitat Mapping), such as mallee and acacia shrublands and open chenopod areas, suitable during periods of inland migration. This species was not observed during the surveys of the project and study area. Breeding does not occur on mainland Australia, hence no breeding habitat is present in the Project Area or Disturbance Footprint. These non-critical habitats are extensive in the region. Based on the above this species is considered possible during winter migration (foraging only). The Project Area is unlikely to support an important population of this species.

The Blue-winged parrot has a broad distribution during non-breeding season across large areas of south-eastern and central Australia and is considered potentially present at times. However, due to the broad species distribution, limited amount of preferred foraging habitat in the Project Area and the fact that the species does not breed within inland Australia, **significant impacts to the species are not expected**.

4.1.4.7 Do you think your proposed action is a controlled action? *

No

4.1.4.9 Please elaborate why you do not think your proposed action is a controlled action. *

The majority of the Proposed Action within the Project Area occurs in an environment which has been influenced by decades of pastoral activity and exploration activities.

The Proposed Action does not represent a controlled action because potential impacts to threatened ecological communities or threatened species are only plausible for 5 threatened species (Nodding Rufoushood, Western Grasswren, Southern Whiteface, Malleefowl and Blue-winged Parrot), only 3 of which (the Nodding Rufoushood, Western Grasswren and Southern Whiteface) have been confirmed as present within the Project Area despite substantial survey effort. Only 1 individual of the orchid species has been detected in habitat that is atypical for the species and subject to grazing and which is not within the proposed Disturbance Footprint. The Southern Whiteface is widespread across the Gawler IBRA region and suitable habitat for the species occurs throughout much of northern Eyre Peninsula, making Project related impacts comparatively insignificant. There is no Western Grasswren preferred habitat within the Project Area, with only areas of atypical (but still suitable) habitat present. The species has been identified at locations which are avoided by the Disturbance Footprint, and establishment of an Avoidance Area will protect these areas during Project development.

Each of the 5 MNES species which are known to be, or potentially present, has substantially larger AOOs than any areas of habitat which would be disturbed by the Proposed Action, and local populations are not considered to represent specific important populations of these species. No habitat deemed as critical refuge habitat, or as critically important for the survival of any of the species is disturbed by the Proposed Action.

Att2_WGIP_SIA, Table 3.1, pg 27-32 and Section 5, pg 36-82 provides a comprehensive description of the likelihood of occurrence of each species identified as potentially present through a review of historic records, desktop findings, in-field assessments and provides an assessment of the potential impacts arising from the Proposed Action by addressing the Commonwealth Significant impact Criteria.

A significant body of recent and historical scientific and environmental baseline data has been collected to support the referral which provides a high level of certainty within the assessment of the potential impact.

Att2_WGIP_SIA, Table 1.1, pg 10-12, includes a summary of the field studies and reports completed which provide valuable data to inform the current understanding of vegetation, habitat and existing ecological values of the Project Area.

Refer to Att2_WGIP_SIA, Table 4.1, pg 36-37 for a summary of the survey effort for the five key species relevant to the Project against DCCEEW criteria.

Nodding Rufoushood

Only one individual of this orchid species was detected (in 2019) in habitat that was considered atypical for the species and it has not been detected since, despite repeated survey effort on site. The location of the record is not within the Disturbance Footprint and an Avoidance Area around the location of where the orchid was recorded will be established. The species is known from 12 discrete locations on the Eyre Peninsula in South Australia, with an estimated area of occurrence 190 km2 (19,000 ha) thought to comprise about 220 plants. The species occurs in coastal areas and up to 100 km inland between Kimba and Cleve, and all known populations are located on private property. The species preferred habitats are not present in the Project Area and are not within the Disturbance Footprint. As a worst case estimate, 157.7 ha of disturbance of similar atypical habitat as per the location if the single record as well as other low suitability habitat outside of any known and potentially important populations of the species, does not constitute a significant impact to the species as a whole, and subsequently this species does not trigger a controlled action (refer Att2_WGIP_SIA, Table 1.1, pg 10-12 and Section 5.1, pg 39-48).

Western Grasswren

The Western Grasswren, has been detected in the Project Area (in the northwest corner), persisting at the site through pastoral and exploration activities. The species was detected at the same location in 2008, 2010, with a probable sighting in 2019, and a further two individuals detected in 2022. The habitat where the species was detected is considered atypical but suitable (i.e. not the preferred habitat of taller, denser shrubs typically located on broad ephemeral water courses or run-on areas) and extends well to the north outside the Project Area. The Disturbance Footprint will only impact minimal areas of similar atypical habitat (6.8 ha), which represents 0.01% of the species Area of Occupancy (76,000 ha). The location where the species has been detected is not within the Disturbance Footprint and will be protected through the establishment of an Avoidance Area (refer Att1_WGIP_Map Series, Map 5_ Avoidance Areas). The species has vast areas (> 1,463 ha within the Project Area) of similar habitat to retreat to and has persisted at the site through exploration activities and ongoing pastoral activities. The location where the species has previously been detected is contiguous with vast areas of similar habitat. Overall, these negligible impacts are considered unlikely to be ecologically significant to this species, and subsequently this species does not trigger a controlled action (refer Att2_WGIP_SIA, Table 1.1, pg 10-12 and Section 5.2, pg 48-58).

Southern Whiteface

The Southern Whiteface, a species which is broadly distributed across most of Australia south of the tropics, has been detected within the Project Area and may utilise habitat within the Disturbance Footprint. This species has an AOO of 7,000,00 ha across an EOO of 491,000,000 ha spanning large parts of arid and interior Australia which would be rarely surveyed. From a regional perspective, the Project occurs in the Gawler Bioregion, where the species AOO is 375,600 ha across an EOO of 15,085,800 ha. The Disturbance Footprint for the Action represents a fraction of the overall distribution of the subspecies within the Gawler Bioregion, and the Action does not dissect any known population in two. Disturbance from the Action (182.3 ha, which represents 0.05% of the Gawler Bioregion AOO) will impact areas of generic non-critical habitat of which there are vast areas adjacent the Project Area which provide suitable habitat for the species. Impacts are therefore not considered to be significant in the context of the species as a whole, and subsequently this species does not trigger a controlled action (refer Att2_WGIP_SIA, Table 1.1, pg 10-12 and Section 5.3, pg 58–66).

Malleefowl

Malleefowl have an extremely broad distribution of across much of Australia within a AOO of 5,000,000 ha. Given previous records within the wider Study Area and presence of suitable foraging habitat, the Malleefowl is considered to potentially occur within mallee habitats that occur within the Project Area.

Whilst 3 historic Malleefowl mounds (2 inactive, 1 disused) have been recorded along the mine access road 6 km west of the Project Area (in 2008), the species has not been recorded despite numerous follow-up surveys. Suitable habitat exists to the east and west of the Project Area, however, habitat within the Project Area is deemed suitable only for foraging. Within the Disturbance Footprint the permanent clearance of up to 182.3 ha of general foraging habitat represents less than 0.004% of the reported AOO of the species. Based on this and the fact that the species has not been detected in the Project Area (or Disturbance Footprint), potential impacts are considered to be negligible and considered unlikely to result in significant impacts to the species and subsequently this species does not trigger a controlled action (refer Att2_WGIP_SIA, Table 1.1, pg 10-12 and Section 5.4, pg 67-76).

Blue-winged Parrot

The Blue-winged parrot has a broad distribution during non-breeding season across large areas of south-eastern and central Australia and is only considered potentially present at times. Whilst suitable generic overwintering foraging and roosting habitat is present, there are no records within 50 km of the Project Area. Given the broad species distribution, limited amount of preferred overwintering foraging habitat in the Project Area and Disturbance Footprint and the fact that the species does not breed within inland Australia, significant impacts to the species are not expected, and subsequently this species does not trigger a controlled action (refer Att2_WGIP_SIA, Table 1.1, pg 10-12 and Section 5.6, pg 76-82).

Migratory species

Non-breeding migrants only are potential very temporary occurrences in, or flyovers of, the Project Area following substantial rain events. The Project Area does not support important habitat for these species. Significant impacts to migratory species are not expected and therefore does not trigger a controlled action.

TEC

The Eyre Peninsula Blue Gum (*Eucalyptus petiolaris*) Woodland community is suggested as 'may occur within the buffer area' (PMST), however, this TEC is considered unlikely based upon a suite of ecological studies and habitat assessments undertaken to date. Significant impacts to a TEC are not expected and therefore does not trigger a controlled action.

4.1.4.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

Att2_WGIP_SIA, Section 5.1.2 (pg 43), 5.2.2 (pg 51), 5.3.2 (pg 61), 5.4.2 (pg 70) and 5.5.2 (pg 79) includes mitigation measures designed to avoid and minimise impacts to EPBC listed threatened species. Comprehensive description of the likelihood of occurrence of each species and an assessment of the potential impacts arising from the Action addressing the Commonwealth Significant impact Criteria are provided in Att2_WGIP_SIA, Table 3.1, pg 27-32.

During the design process for the Proposed Action, infrastructure locations were positioned wherever practicable to avoid or minimise impacts to any habitats which were deemed potentially suitable to EPBC listed species. This included avoidance where practicable of any identified:

- areas of low woodland, or higher density and taller shrublands, to reduce potential impacts to Southern Whiteface
- known locations where threatened species have been detected (e.g. 2 individual Western Grasswren, several Southern Whiteface and one Nodding Rufoushood orchid plant).

Two Avoidance Areas will be established (refer Att1_WGIP_Map Series, Map 5_ Avoidance Areas), with Avoidance Area 1 located in the area where Western Grasswren have been recorded and Avoidance Area 2 located around where there was a single record of the Nodding Rufoushood orchid.

4.1.4.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

As no significant impacts to Listed threatened species, threatened ecological communities or migratory species are anticipated, no specific offsets have been considered under the EPBC Act.

Offsets are required for native vegetation loss in South Australia, as specified under the *Native Vegetation Act 1991* (SA). The area (or cost) of offset required increases when the vegetation to be cleared supports threatened species (including both State and Commonwealth threatened species). In South Australia, developments which are approved under the Mining Act (such as the Proposed Action) apply for clearance of native vegetation concurrently within the approval process (Program for Environment Protection and Rehabilitation (PEPR)). Alliance has submitted a mining application for the purpose of undertaking the approved mining and processing operations and native vegetation clearance applications to the Native Vegetation Council (NVC) will be included as part of the PEPR approval.

A Native Vegetation Data Report (NVDR and or Native Vegetation Management Plan (NVMP) attached to the PEPR will outline the clearance required, the type and condition of vegetation to be cleared, and the required offset (under the SA Native Vegetation Act) and how the environmental offset (termed Significant Environmental Benefit (SEB)) will be achieved. Alliance is giving consideration to establishment of an on-ground SEB offset, which would likely provide protection to similar habitats to those being disturbed, and as such potential habitat for the MNES species discussed here. An on-ground offset would be dependent on successful negotiations with landholders and has not yet been finalised.

4.1.5 Migratory Species

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Species	Common name
No	No	Actitis hypoleucos	Common Sandpiper
No	No	Apus pacificus	Fork-tailed Swift
No	No	Calidris acuminata	Sharp-tailed Sandpiper
No	No	Calidris ferruginea	Curlew Sandpiper
No	No	Calidris melanotos	Pectoral Sandpiper
No	No	Charadrius veredus	Oriental Plover, Oriental Dotterel
No	No	Gallinago hardwickii	Latham's Snipe, Japanese Snipe
No	No	Motacilla cinerea	Grey Wagtail
No	No	Motacilla flava	Yellow Wagtail

4.1.5.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.5.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

Ten EPBC listed migratory species are identified as either potentially occurring or present in the Project Area which may potentially be impacted by the Proposed Action.

Migratory wetland (wading species) identified by the PMST (refer to Att2_WGIP_SIA, Appendix A), that were not already addressed under threatened species, included Common Sandpiper (*Actitis hypoleucos*), Pectoral Sandpiper (*Calidris melanotos*) and Oriental Plover and Oriental Dotterel (*Charadrius veredus*). Suitable habitat for these wading species in the Project Area only includes several farm dams when water is present. These dams are unlikely to support suitable food resources for migratory waders or represent important habitat for any of these species. Hence suitable habitat for these migratory waders is very limited, extremely localised, and temporary, and these species are also considered as only potential occurrences in the Project Area and unlikely to be in, or reliant on habitat within, the Disturbance Footprint.

Similarly, three Migratory marine species were identified by the PMST (refer to Att2_WGIP_SIA, Appendix A); Fork-tailed Swift (*Apus pacificus*), Grey Wagtail (*Motacilla cinerea*) and Yellow Wagtail (*Motacilla flava*). The Fork-tailed Swift is an overfly species and no unique or critical habitat is likely to occur in the Project Area or Disturbance Footprint. Similarly, there is no suitable habitat for the Wagtail species, also considered unlikely to occur in the Project Area or Disturbance Footprint.

Potential direct and indirect impact pathways relevant to these migratory wading species are:

- Loss of small areas of highly ephemeral temporary suboptimal habitat (farm dams).
- Injury or mortality from collisions with vehicles.
- Introduction of invasive weed species or disease impacting on non-critical habitat.
- Increased feral animal predation or competition.

The Fork-tailed Swift / Pacific Swift is considered possible as a fly-over species, however no potential direct or indirect impact pathways were identified as it is an aerial species.

No EPBC listed Migratory species or their habitat have been identified within the Project Area based on surveys undertaken to date (with the exception of farm dams). Migratory species are considered to be only very temporary and transient visitors to the Project Area, if present at all, given the lack of permanent water bodies or other suitable habitat, and the highly ephemeral nature of habitats which may retain water following substantial rainfall events. Following any substantial rainfall events, habitats which are more suitable than those within the Project Area are expected to be available more broadly across the landscape.

Migratory species which may potentially be temporarily present do not breed in Australia, so the Action would not disturb any breeding activity.

Att2_WGIP_SIA, Table 6.2, pg 85-86 provides a comprehensive description of the likelihood of occurrence of each Migratory species identified as potentially present through a review of historic records of the species, desktop findings and in-field assessments, and provides an assessment of the potential impacts arising from the Action by addressing the Commonwealth Significant impact Criteria for Migratory Species.

4.1.6 Nuclear

4.1.6.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.6.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action does not involve a nuclear action. No uranium mining will occur. No radiological characteristics have been identified with the gold and iron ore bodies that are subject to the Proposed Action. Refer the WGIP mining application (Alliance 2023), Section 3.4.3, pg 3-29 of the mining application (via hyperlink) for a geological description of the deposit.

4.1.7 Commonwealth Marine Area

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.7.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.7.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

There are no Commonwealth Marine Areas within or near the Proposed Action (confirmed via the EPBC Act Protected Matters Report, March 2025, refer Att2_WGIP_SIA, Appendix A). The Proposed Action does not interact with the marine environmental.

The nearest Commonwealth marine area is the Western Eyre Marine Park, located over 200 km to the south of the Project off the coast of Port Lincoln.

The Action does not interact with the marine environment in any way and there are no impacts to this MNES.

4.1.8 Great Barrier Reef

4.1.8.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.8.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Great Barrier Reef is distant from the Proposed Action (confirmed via the EPBC Act Protected Matters Report, March 2025, refer Att2_WGIP_SIA, Appendix A). The Proposed Action does not interact with the marine environmental.

The closest point of the Great Barrier Reef Marine Park is located over 1,800 km north-east of the Proposed Action (confirmed by NatureMaps DEW 2025 and the EPBC Act PMST, refer to Att2_WGIP_SIA, Appendix A).

4.1.9 Water resource in relation to large coal mining development or coal seam gas

4.1.9.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.9.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action is not directly or indirectly associated with a coal seam gas development or large coal mining development.

4.1.10 Commonwealth Land

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.10.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.10.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action does not directly or indirectly interact with any Commonwealth Land.

4.1.11 Commonwealth Heritage Places Overseas

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.11.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.11.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

There are no Commonwealth Heritage Places Overseas that apply to the Proposed Action, hence there will be no significant impact.

4.1.12 Commonwealth or Commonwealth Agency

4.1.12.1 Is the proposed action to be taken by the Commonwealth or a Commonwealth Agency? *

No

4.2 Impact summary

Conclusion on the likelihood of significant impacts

You have indicated that the proposed action will likely have a significant impact on the following Matters of National Environmental Significance:

None

Conclusion on the likelihood of unlikely significant impacts

You have indicated that the proposed action will unlikely have a significant impact on the following Matters of National Environmental Significance:

- World Heritage (S12)
- National Heritage (S15B)
- Ramsar Wetland (S16)
- Threatened Species and Ecological Communities (S18)
- Migratory Species (S20)
- Nuclear (S21)
- Commonwealth Marine Area (S23)
- Great Barrier Reef (S24B)
- Water resource in relation to large coal mining development or coal seam gas (S24D)
- Commonwealth Land (S26)
- Commonwealth Heritage Places Overseas (S27B)
- Commonwealth or Commonwealth Agency (S28)

4.3 Alternatives

4.3.1 Do you have any possible alternatives for your proposed action to be considered as part of your referral? *

No

4.3.8 Describe why alternatives for your proposed action were not possible. *

The location of the Proposed Action is constrained by the location of the mineral resources which will be subject to mining as part of the Proposed Action. The mine design and layout has been optimised to minimise clearance of native vegetation, wherever practicable.

A number of development scenarios have been considered for the Proposed Action, including alternatives for mining methods and power requirements. Options considered included:

- Open pit mining versus underground mining, or a combination of the two
- Diesel/gas fired power generation versus a combination of thermal, wind and solar power.

A combination of open pit and underground methods for mining was determined to be the best option for gold, given the style of mineralisation, depth of mineralisation, ore grades, overall mining costs and resource recovery. Iron ore mining was considered suitable to exclusively open pit mining methods. The preferred orientation and shape of the open pits was refined through an optimisation process to maximise gold and iron ore recovery.

The possibility of future open pit and underground mining of the resource exists, should mineralised structures continue at sufficient grades and widths to justify mining.

Opportunities for installation of renewable power generation have been investigated including solar and wind farm options, however it was determined that this will not be cost effective for the initial operation and therefore traditional diesel/gas fired generators will be utilised. If use of renewable power generation is determined to be feasible in the future and solar/wind generation is installed, the diesel generators would then provide backup power.

Refer to the WGIP mining application (Alliance 2023), Section 4.1.4, pg 4-9 (via hyperlink) for additional details.

5. Lodgement

5.1 Attachments

1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1_WGIP_Map Series.pdf Maps relevant to the Project Area	13/08/2025	Yes	High
#2.	Document	Att1_WGIP_Map Series_REDACTED_V2_2025_08_28.pdf Maps relevant to the Project Area REDACTED version	13/08/2025	Yes	High
#3.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	12/08/2025	Yes	High
#4.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_28.pdf EPBC Significant Impact Assessment REDACTED version	28/08/2025	No	High
#5.	Document	Att6_WGIP_Water Studies.pdf Summary of hydrology studies for the project	30/07/2025	No	High
#6.	Link	WGIP mining application https://catalog.sarig.sa.gov.au/dataset/mesac304..			High
#7.	Link	WGIP ML6565 tenement document https://www.energymining.sa.gov.au/__data/assets..			High

1.2.6 Commonwealth or state legislation, planning frameworks or policy documents that are relevant to the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att5_AAR Search Results.pdf Search results from the Register of Aboriginal Sites and Objects (SA)	17/02/2023	No	High
#2.	Link	WGIP mining application https://catalog.sarig.sa.gov.au/dataset/mesac304..			High
#3.	Link	WGIP ML6565 tenement document https://www.energymining.sa.gov.au/__data/assets..			High

1.2.7 Public consultation regarding the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att4_WGIP_Engagement Plan.pdf Stakeholder engagement plan with engagement register as at 11/8/2025	30/10/2023	Yes	High
#2.	Document				

		Att4_WGIP_Engagement Plan_REDACTED_V2_2025_08_28.pdf Stakeholder engagement plan with engagement register as at 11/8/2025 REDACTED version	30/10/2023	No	High
#3.	Document	Att5_AAR Search Results.pdf Search results from the Register of Aboriginal Sites and Objects (SA)	16/02/2023	No	High

1.3.2.18 (Person proposing to take the action) If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att7_Alliance Env Policy.pdf Alliance's environmental, social and governance (ESG) policy	17/07/2025	No	High

2.2.5 Tenure of the action area relevant to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1_WGIP_Map Series.pdf Maps relevant to the Project Area	12/08/2025	Yes	High
#2.	Document	Att1_WGIP_Map Series_REDACTED_V2_2025_08_28.pdf Maps relevant to the Project Area REDACTED version	12/08/2025	No	High
#3.	Link	WGIP ML6565 tenement document https://www.energymining.sa.gov.au/__data/assets..			High

3.1.1 Current condition of the project area's environment

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1_WGIP_Map Series.pdf Maps relevant to the Project Area	12/08/2025	Yes	High
#2.	Document	Att1_WGIP_Map Series_REDACTED_V2_2025_08_28.pdf Maps relevant to the Project Area REDACTED version	12/08/2025	No	High
#3.	Link	WGIP mining application https://catalog.sarig.sa.gov.au/dataset/mesac304..			High

3.1.2 Existing or proposed uses for the project area

	Type	Name	Date	Sensitivity	Confidence

#1.	Link	WGIP ML6565 tenement document https://www.energymining.sa.gov.au/__data/assets..	High

3.1.3 Natural features, important or unique values that applies to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1_WGIP_Map Series.pdf Maps relevant to the Project Area	12/08/2025	Yes	High
#2.	Document	Att1_WGIP_Map Series_REDACTED_V2_2025_08_28.pdf Maps relevant to the Project Area REDACTED version	12/08/2025	No	High

3.2.1 Flora and fauna within the affected area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	11/08/2025	Yes	High
#2.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_12.pdf EPBC Significant Impact Assessment REDACTED version	12/08/2025	No	High
#3.	Link	WGIP mining application https://catalog.sarig.sa.gov.au/dataset/mesac304..			High

3.2.2 Vegetation within the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	11/08/2025	Yes	High
#2.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_12.pdf EPBC Significant Impact Assessment REDACTED version	12/08/2025	No	High
#3.	Document	Att3_WGIP_EcolAssessments.pdf Ecological assessments for the project	21/03/2023	No	High
#4.	Document	Att3_WGIP_EcolAssessments_REDACTED.pdf Ecological assessments for the project REDACTED version	30/10/2023	No	High
#5.	Link	WGIP mining application https://catalog.sarig.sa.gov.au/dataset/mesac304..			High

3.3.1 Commonwealth heritage places overseas or other places that apply to the project area

Type	Name	Date	Sensitivity	Confidence
#1.	Link	WGIP mining application https://catalog.sarig.sa.gov.au/dataset/mesac304..		High

3.3.2 Indigenous heritage values that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att5_AAR Search Results.pdf Search results from the Register of Aboriginal Sites and Objects (SA)	16/02/2023	No	High

3.4.1 Hydrology characteristics that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att6_WGIP_Water Studies.pdf Summary of hydrology studies for the project	29/07/2025	No	High

4.1.1.3 (World Heritage) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	11/08/2025	Yes	High
#2.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_28.pdf EPBC Significant Impact Assessment REDACTED version	28/08/2025	No	High

4.1.2.3 (National Heritage) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	11/08/2025	Yes	High
#2.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_28.pdf EPBC Significant Impact Assessment REDACTED version	28/08/2025	No	High

4.1.3.3 (Ramsar Wetland) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	11/08/2025	Yes	High
#2.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_28.pdf EPBC Significant Impact Assessment REDACTED version	28/08/2025	No	High

4.1.4.2 (Threatened Species and Ecological Communities) Why your action has a direct and/or indirect impact on the identified protected matters

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1_WGIP_Map Series.pdf Maps relevant to the Project Area	12/08/2025	Yes	High
#2.	Document	Att1_WGIP_Map Series_REDACTED_V2_2025_08_28.pdf Maps relevant to the Project Area REDACTED version	12/08/2025	No	High
#3.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	11/08/2025	Yes	High
#4.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_28.pdf EPBC Significant Impact Assessment REDACTED version	28/08/2025	No	High
#5.	Document	Att3_WGIP_EcolAssessments.pdf Ecological assessments for the project	20/03/2023	No	High
#6.	Document	Att3_WGIP_EcolAssessments_REDACTED.pdf Ecological assessments for the project REDACTED version	20/10/2023	No	High

4.1.4.6 (Threatened Species and Ecological Communities) Why you do not consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1_WGIP_Map Series.pdf Maps relevant to the Project Area	12/08/2025	Yes	High
#2.	Document	Att1_WGIP_Map Series_REDACTED_V2_2025_08_28.pdf Maps relevant to the Project Area REDACTED version	12/08/2025	No	High
#3.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	11/08/2025	Yes	High
#4.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_28.pdf EPBC Significant Impact Assessment REDACTED version	28/08/2025	No	High

4.1.4.9 (Threatened Species and Ecological Communities) Why you do not think your proposed action is a controlled action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1_WGIP_Map Series.pdf Maps relevant to the Project Area	12/08/2025	Yes	High
#2.	Document	Att1_WGIP_Map Series_REDACTED_V2_2025_08_28.pdf Maps relevant to the Project Area REDACTED version	12/08/2025	No	High

#3.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	11/08/2025	Yes	High
#4.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_28.pdf EPBC Significant Impact Assessment REDACTED version	28/08/2025	No	High

4.1.4.10 (Threatened Species and Ecological Communities) Avoidance or mitigation measures proposed for this action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att1_WGIP_Map Series.pdf Maps relevant to the Project Area	12/08/2025	Yes	High
#2.	Document	Att1_WGIP_Map Series_REDACTED_V2_2025_08_28.pdf Maps relevant to the Project Area REDACTED version	12/08/2025	No	High
#3.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	11/08/2025	Yes	High
#4.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_28.pdf EPBC Significant Impact Assessment REDACTED version	28/08/2025	No	High

4.1.5.3 (Migratory Species) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	11/08/2025	Yes	High
#2.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_28.pdf EPBC Significant Impact Assessment REDACTED version	28/08/2025	No	High

4.1.6.3 (Nuclear) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	WGIP mining application https://catalog.sarig.sa.gov.au/dataset/mesac304..			High

4.1.7.3 (Commonwealth Marine Area) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	11/08/2025	Yes	High
#2.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_28.pdf EPBC Significant Impact Assessment REDACTED version	28/08/2025	No	High

4.1.8.3 (Great Barrier Reef) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att2_WGIP_SIA.pdf EPBC Significant Impact Assessment	11/08/2025	Yes	High
#2.	Document	Att2_WGIP_SIA_REDACTED_V2_2025_08_28.pdf EPBC Significant Impact Assessment REDACTED version	28/08/2025	No	High

4.3.8 Why alternatives for your proposed action were not possible

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	WGIP mining application https://catalog.sarig.sa.gov.au/dataset/mesac304..			High

5.2 Declarations

Completed Referring party's declaration

The Referring party is the person preparing the information in this referral.

ABN/ACN	21459872063
Organisation name	The Trustee for Johnston Family Trust T/A Kinesis Projects
Organisation address	8 Rowells Road, Lockleys 5032 SA
Representative's name	Amy Tucker
Representative's job title	Senior Scientist and Stakeholder Engagement Specialist
Phone	0414 917 444
Email	amy@kinesisprojects.com.au
Address	8 Rowells Road

☑ Check this box to indicate you have read the referral form. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

☑ By checking this box, I, **Amy Tucker of The Trustee for Johnston Family Trust T/A Kinesis Projects**, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

Completed Person proposing to take the action's declaration

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	37095337385
Organisation name	ALLIANCE (EYRE) PTY LTD
Organisation address	Suite 3, 51 - 55 City Road Southbank VIC 3006
Representative's name	Steven Gandel

Representative's job title	Chief Executive Officer
Phone	0418151617
Email	steveg@gandelmetals.com.au
Address	Suite 3, 51 - 55 City Road Southbank VIC 3006

☑ Check this box to indicate you have read the referral form. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

☑ I, **Steven Gandel of ALLIANCE (EYRE) PTY LTD**, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

✔ Completed Proposed designated proponent's declaration

The Proposed designated proponent is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

☑ Check this box to indicate you have read the referral form. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

☑ I, **Steven Gandel of ALLIANCE (EYRE) PTY LTD**, the Proposed designated proponent, consent to the designation of myself as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. *

☐ I would like to receive notifications and track the referral progress through the EPBC portal. *