

Bidamina Project Site Investigations

Application Number: **02676**

Commencement Date:
07/11/2024

Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

Bidamina Project Site Investigations

1.1.2 Project industry type *

Mining

1.1.3 Project industry sub-type

Mineral sand mine

1.1.4 Estimated start date *

01/02/2025

1.1.4 Estimated end date *

01/04/2027

1.2 Proposed Action details

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

Image Resources NL (Image) is planning to develop the Bidamina Project, a mineral sands mine located approximately 100 kilometres (km) northwest of Perth and 15 km SW of Regan's Ford in the Wheatbelt region of Western Australia (WA) (Attachment 1 Figure Regional Location). The Bidamina Project was referred to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) on 2 February 2023 and received a Controlled Action decision on 15 February 2023 (EPBC 2022/09360).

Image is proposing to complete resource, geotechnical and water resource drilling activities to better define the Project (Proposed Action). Clearing will be required for the following:

- Up to 54 access track extensions approximately 3 m wide;
- Up to 349 drill pads approximately 5 x 10 m each; and
- Water disposal, approximately 0.77 ha.

Access tracks will be created by raised blade clearing, drill pads will require mechanical clearing. It is estimated that up to 5 ha of clearing will be required for the Proposed Action. The Proposed Action will be undertaken within the Development Envelope shown in Attachment 2 Figure Project Area (Project Area).

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

Yes

1.2.3 Is the proposed action the first stage of a staged development (or a larger project)?

No

1.2.4 Related referral(s)

EPBC Number	Project Title
2022/09360	Bidaminna Project

1.2.5 Provide information about the staged development (or relevant larger project).

The Bidaminna Project was referred to DCCEEW in September 2022 (EPBC 2022/09360). DCCEEW determined that the Project was a 'controlled action' and required assessment and approval under the *Environment Protection and Biodiversity Conservation Act, 1999* (EPBC Act), due to potential impacts on the following relevant controlling provisions:

- Listed threatened species and communities (sections 18 & 18A).

The Bidaminna Project will be assessed as an 'accredited assessment' under Part IV of the EP Act. Section 87 of the EPBC Act makes provisions for the EPA to undertake this accredited assessment of the potential impacts to Matters of National Environmental Significance (MNES) on behalf of DCCEEW. The Environmental Scoping Document has been approved and Image are currently preparing the Environmental Review Document.

The Proposed Action is required for resource, geotechnical and water resource drilling which will be used to inform the detailed design of the larger Bidaminna Project.

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

Environmental Protection and Biodiversity Conservation Act 1999

Image is seeking a decision on whether or not environmental approval for the Proposed Action is required under the *Environment Protection and Biodiversity Act 1999* (Commonwealth) (EPBC Act). The Proposed Action is being referred under the EPBC Act, given the potential impacts to MNES.

Image will not be seeking that the WA EPA conduct an accredited assessment for this Proposed Action as the scale of the Proposed Action does not require assessment under Part IV of the Environmental Protection Act 1986 (EP Act).

Environmental Protection Act 1986 (WA)

The Proposed Action does not trigger referral under Part IV of the EP Act.

Image has received approval for some of the proposed actions under Part V Division 2 of the EP Act via a Native Vegetation Clearing Permit (NVCP). Further NVCP applications will be submitted to the Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) as required.

Land Tenure

The Proposed Action is to be implemented entirely on tenements issued under the *Mining Act 1978* (Mining Act).

Rights in Water and Irrigation Act 1914 (WA)

Water resource drilling will require licensing from DWER for the construction and development of a bore to test site water resources.

Mining Act 1978 (WA)

Programmes of Work applications under the Mining Act have been made with further applications to be made in the future.

Other Decision-Making Authorities, Approvals and Regulation

The following environmental approvals will be required to implement the Proposed Action:

- No approval requirements are considered likely to apply under the *Aboriginal Heritage Act 1972* (WA) for the disturbance of Aboriginal heritage sites (if recorded and cannot be avoided).

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. *

The following stakeholders have been consulted with as part of consultation for this referral and the larger Bidaminna Project:

- Commonwealth Government:
 - DCCEEW – pre-referral meeting on 19 March 2024 regarding submission of this referral and potential impacts on MNES.
- State Government:
 - Department of Biodiversity, Conservation and Attractions (DBCA) – Threatened and Priority flora, ecological communities and fauna, offsets;
 - Department of Planning, Lands and Heritage (DPLH) – potential impacts to Aboriginal heritage sites, heritage surveys and offsets;
 - Department of Transport – haulage of product and shipping;
 - DEMIRS – Mining Act tenure, investigations and development approvals, closure and rehabilitation;
 - Department of Water and Environmental Regulation (DWER), (EPA, Industry Regulation and Water Licensing) – Part IV EP Act assessment process, accredited assessment by the EPA, water supply approvals, works approvals and licences under Part V of the EP Act; and

- Relevant Members of Parliament where appropriate/required.
- Other:
 - Shire of Gingin - Local Government Authority;
 - Adjacent private landholders;
 - Relevant ports authority – export operations;
 - Non-government organisations and community groups – impacts to species, habitats or areas of interest to organisations or groups; and
 - The Yued People Native Title Group – Native Title rights and heritage agreements.

Consultation is expected to be ongoing with most of the stakeholders identified throughout the construction, operational and closure phases of the Proposed Action.

Yued Native Title Group

An outcome of consultation with the Yued People is that they will be involved in all ground disturbing activities including clearing and resource drilling.

State Government

As a result of consultation with DBCA, DWER and DEMIRS, Image has been granted an NVCP and Programme of Work for the Proposed Action.

1.3.1 Identity: Referring party

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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.

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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	85137515078
Organisation name	Preston Consulting Pty Ltd
Organisation address	Level 1, 226 Adelaide Terrace, Perth, Western Australia, 6000
Referring party details	
Name	Phoebe Ranford
Job title	Environmental Consultant
Phone	0427080869
Email	pranford@prestonconsulting.com.au
Address	Level 1, 226 Adelaide Terrace, Perth, Western Australia, 6000

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	57063977579
Organisation name	IMAGE RESOURCES NL

Organisation address Level 2, 1 Walker Avenue West Perth, Western Australia. 6005

Person proposing to take the action details

Name Graeme Kininmonth

Job title Senior Consultant

Phone (08) 9485 2410

Email gkininmonth@imageres.com.au

Address Level 2, 1 Walker Avenue West Perth, Western Australia. 6005

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. *

Yes, Image has a satisfactory record of responsible environment management since their inception. No significant environmental non-compliances have been identified to-date.
In addition to the Proposed Action, Image has also referred the Atlas Mineral Sands Project (2021/9056) which received approval with conditions in August 2024.
There are no current or previous proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against Image.

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

Image has developed an Environmental Management System (EMS) based on the structure and recommendations detailed in ISO 14001. The EMS has been developed to manage those activities, products and services that may have an impact on the environment. The EMS applies to all of Image's activities in WA. The EMS utilises a risk management process and approach to enable Image to identify, prioritise and manage environmental risks. A copy of Image's Environmental Policy has been provided as Attachment 3 Environmental 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	57063977579
Organisation name	IMAGE RESOURCES NL
Organisation address	Level 2, 1 Walker Avenue West Perth, Western Australia. 6005

Proposed designated proponent details

Name	Graeme Kininmonth
Job title	Senior Consultant
Phone	(08) 9485 2410
Email	gkininmonth@imageres.com.au

Address

Level 2, 1 Walker Avenue West Perth, Western Australia. 6005

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	85137515078
Organisation name	Preston Consulting Pty Ltd
Organisation address	Level 1, 226 Adelaide Terrace, Perth, Western Australia, 6000
Representative's name	Phoebe Ranford
Representative's job title	Environmental Consultant
Phone	0427080869
Email	pranford@prestonconsulting.com.au
Address	Level 1, 226 Adelaide Terrace, Perth, Western Australia, 6000

✔ 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	57063977579
Organisation name	IMAGE RESOURCES NL
Organisation address	Level 2, 1 Walker Avenue West Perth, Western Australia. 6005
Representative's name	Graeme Kininmonth
Representative's job title	Senior Consultant
Phone	(08) 9485 2410
Email	gkininmonth@imageres.com.au
Address	Level 2, 1 Walker Avenue West Perth, Western Australia. 6005

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)? *

No

1.4.3 Have you applied for or been granted a waiver for full or partial fees under Regulation 5.21A? *

No

1.4.5 Are you going to apply for a waiver of full or partial fees under EPBC Regulation 5.21A?

No

1.4.7 Has the department issued you with a credit note? *

No

1.4.9 Would you like to add a purchase order number to your invoice? *

No

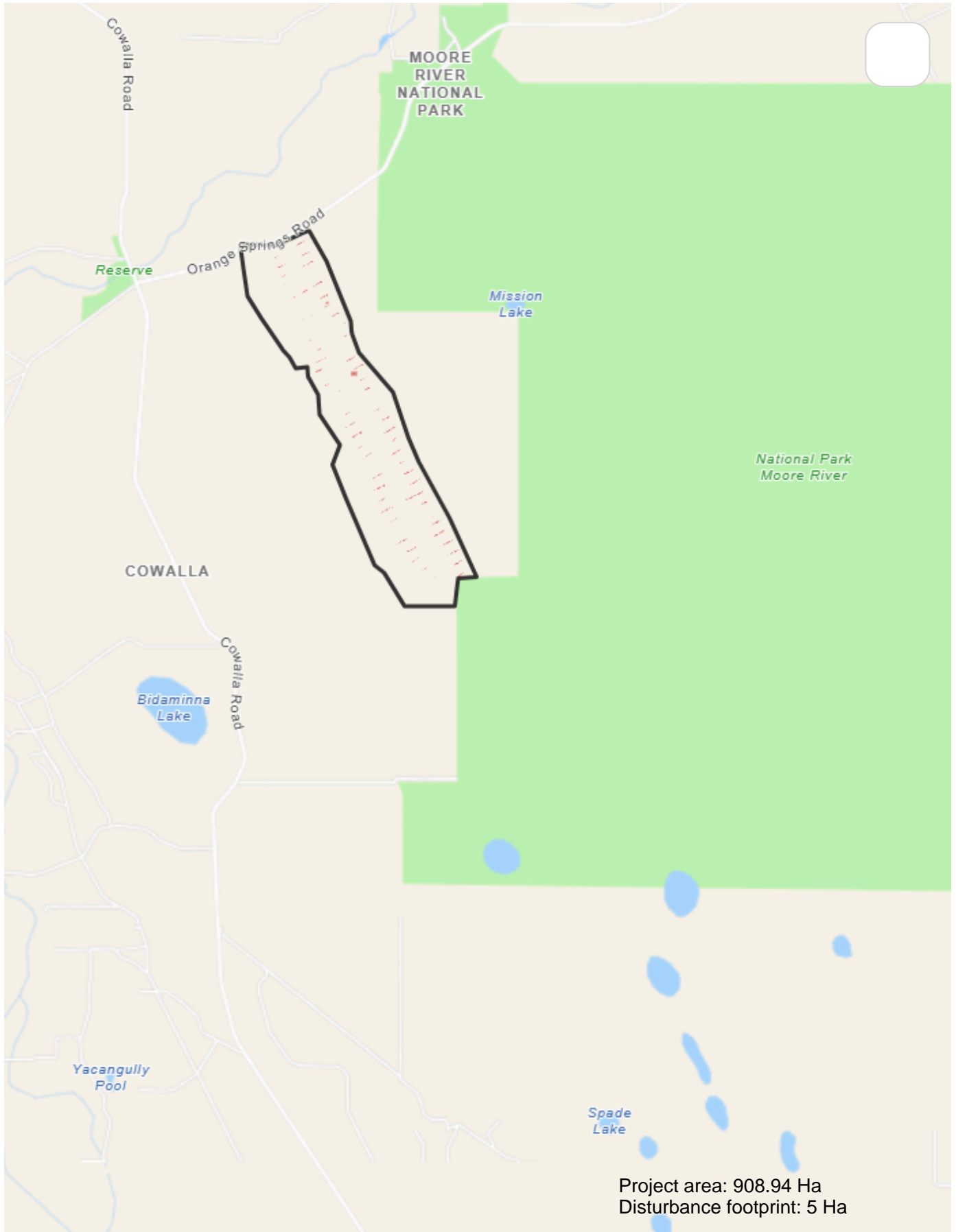
1.4 Payment details: Payment allocation

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

Proposed designated proponent

2. Location

2.1 Project footprint



2.2 Footprint details

2.2.1 What is the address of the proposed action? *

E70/2844, E70/3298, south of 1546 Orange Springs Road, Cowalla WA 6503.

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

Western 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 Proposed Action is to be implemented entirely on E70/2844 and E70/3298 issued under the Mining Act (Attachment 4 Figure Tenure). Underlying this Mining Act tenure is Unallocated Crown Land and a small portion of freehold land.

3. Existing environment

3.1 Physical description

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

The majority of the Project Area is vegetated with vegetation condition considered to be 'Pristine' for most of the *Banksia* woodland areas and most of the dampland shrublands/heaths (Attachment 5 Figure Veg Condition). Vegetation condition was rated lower south of an old east-west fenceline near the southern boundary of the survey area, where past grazing appears to have occurred (Attachment 5 Figure Veg Condition). A small area in the western corner of this area had been cleared and some regrowth was present ('Degraded' and 'Degraded to Completely Degraded').

The annual rainfall average for the region is 579 mm, 13% below the long-term average (Attachment 6 Surface Water Report, Section 3.4, pp 7). The last rainfall event significantly greater than the average was in 1999. The DWER river gauging station 617001 (Quinn's Ford) is located 24 km east of the Proposed Action. Since 2000, there has only been three years that have exceeded the long-term average.

The area to the east of the Project Area is currently zoned as Conservation Purpose (Moore River National Park). The areas to the north, south and west of the Project Area are currently zoned as Rural Smallholding and Rural Uncoded.

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

The majority of the Project Area is located on Unallocated Crown Land, consisting of native vegetation with limited or no current productive land use.

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

Geomorphic wetlands have been digitally mapped by DBCA over the Swan Coastal Plain, including two 'Damplands' which intersect the northern and southern sections of the Project Area (Attachment 6 Surface Water Report, Figure 5, pp 10). The Damplands have been allocated to the 'Conservation Management' Category which is described as "Wetlands which support a high level of attributes and functions". However, it was identified that the areas mapped as Damplands were found to have no particular hydrological characteristics (Attachment 6 Surface Water Report, Section 3.6, pp 11).

Moore River is located more than 1 km north of the Proposed Action. Moore River forms the basis of the Moore River Catchment and is a key component of the regional and local hydrology. The majority of streamflow past Bidaminna originates from the middle of the Moore River Catchment. Moore River is also culturally significant to Aboriginal People as a Waugal Site (Place ID: 20749; Attachment 7 Desktop Heritage Report, Section 7.3, pp 17).

Moore River National Park is located immediately east of the Proposed Action. The park has been set aside for preservation of biodiversity and natural and/or cultural heritage values.

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 Proposed Action is situated beneath a gently west-sloping planar ground surface at an elevation of 57-60 m Australian Height Datum (AHD) (Attachment 6 Surface Water Report, Section 2, pp 2). The local landform is the Bassendean Sands system which reaches a peak elevation of 100 m AHD, forming a local catchment boundary about 4 km east of the site (Attachment 8 Figure Land Systems). The western side of Bassendean Sands where the Proposed Action is situated, is a nearly planar, 0.3% west-sloping surface (Attachment 6 Surface Water Report, Section 3.5, pp 8).

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.

Flora

A detailed flora and vegetation survey of the Project Area was undertaken in November 2021 and May 2022 as part of the survey for the larger Bidaminna Project. The report for this survey is still being prepared however preliminary results have been provided where applicable. Desktop searches were conducted of the Project Area using DBCA data to determine the baseline flora and vegetation values. The following information has been sourced from the desktop searches:

- The Proposed Action lies within an area of the Drummond Botanical Sub-district mapped by Beard (1981) as 'Banksia low woodland on white sand of coastal plain with numerous patches of heath in swamps';
- The majority of the Project Area is comprised of remnant native vegetation;
- No Threatened Flora have previously been recorded within the Project Area;
- Two Threatened Flora species were identified approximately 9 km east of the Project Area:
 - *Darwinia carnea* (Endangered); and
 - *Darwinia acerosa* (Endangered).

The DBCA database search showed that the '*Banksia attenuata* woodland over species rich dense shrublands SCP20a' (TEC (Endangered)) and '*Banksia* Dominated Woodlands of the Swan Coastal Plain ecological community' TEC (Endangered)) occurred in the survey area (Attachment 9 Figure Desktop TEC). Conservation category wetlands have been mapped in the survey area, but no Ramsar wetlands or Wetlands of National Importance occur in the survey area.

A total of 282 native plant taxa were recorded in the survey area, consisting of one native cycad and 281 species of native flowering plants. Twenty nine (29) weed species were also recorded in the survey area. Native species counts were assessed as moderate for the size of the area surveyed. No Threatened Flora species were recorded during the 2021-2022 Bidaminna survey.

Fauna

Spectrum Ecology Pty Ltd (Spectrum) undertook a desktop study and detailed survey of the Project Area to define the potential terrestrial fauna values present (Attachment 10 Fauna Report). The desktop study identified 311 native and seven introduced vertebrate taxa within the desktop search extent (Attachment 10 Fauna Report, Section 2.1.1, pp 36). Records of 51 significant vertebrate fauna species with the potential of occurring in the Study Area were identified in the desktop study including 43 species listed as Threatened under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

During the detailed fauna assessment field survey work 94 vertebrate fauna species were recorded including one Threatened species; Carnaby's Cockatoo (Endangered) (Attachment 10 Fauna Report, Section 4.3.1, pp 47). The likelihood of occurrence assessment of the remaining 42 Threatened species identified in the desktop study were determined as follows: No other species were considered to have a High likelihood of occurrence, three were considered to have a Medium likelihood of occurrence and the remaining species were considered to have a Low to Very Low likelihood of occurrence (Attachment 10 Fauna Report, Table 5.1, pp 63). The three Threatened species identified as having a Medium likelihood of occurrence are:

- Western Swamp Tortoise (Critically Endangered);
- Western Quoll (Vulnerable); and
- Fork-tailed Swift (Migratory).

A translocated population of Western Swamp Tortoise is known from the Moore River Nature Reserve in the south-east portion where clay soils occur. The Project Area is approximately 10 km northwest of the release location. Previous monitoring has shown that some of the tortoises moved into a swamp 1 km southeast of the release site. The Project Area does not contain suitable swamps for the species but may provide suitable habitat for aestivating individuals. A targeted search of a defined area within the Project Area failed to locate any evidence of aestivating tortoises (Attachment 10 Fauna Report, Table 5.1, pp 71).

Suitable habitat for the Western Quoll occurs within the Project Area however there have not been any recorded in the local area within the last 20 years (Attachment 10 Fauna Report, Table 5.1., pp 63).

The Fork-tailed Swift may occur infrequently within the Project Area due to the association with storm fronts, however use of the Project Area would be limited to flying over for foraging (Attachment 10 Fauna Report, Table 5.1, pp 66).

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

Vegetation condition was considered to be 'Pristine' for most of the *Banksia* woodland areas and most of the dampland shrublands/heaths. Vegetation condition was rated lower south of an old east-west fenceline near the southern boundary of the survey area, where past grazing appears to have occurred. A small area in the western corner of this area had been cleared and some regrowth was present ('Degraded' and 'Degraded to Completely Degraded') (Attachment 5 Figure Veg Condition).

The survey area lies in the Drummond Botanical Sub-District in the Darling Botanical District of the South West Botanical Province of WA. The survey area lies within the Vegetation System Association (VSA) Bassendean-949: 'low woodland or open low woodland' ('low woodland; banksia') (Attachment 11 Figure Pre-European Veg). The current extent of the Bassendean-949 VSA in the Perth Interim Biogeographic Representation of Australia (IBRA) sub-region is 69,621 ha (60.8% of the pre-European extent). Up to 20.8% of the current extent of Bassendean-949 VSA is protected for conservation.

The Proposed Action is located within the Swan Coastal Plain IBRA region and Perth subregion (Attachment 12 Figure IBRA Subregion). The soils of the Swan Coastal Plain are typically sandy with several dune systems running parallel north-south along the plain incorporating a complex series of seasonal fresh water wetlands, alluvial river flats, coastal limestones and offshore islands.

The geology of WA has been mapped at scales of 1:50,000, 1:100,000, 1:250,000, and 1:500,000. The Project Area occurs in the central west of the 1:500,000 scale geological mapping and consists of a single geological unit; K-CYo-sll. This unit is associated with accumulated sand forming broad dune features running parallel to the west coast. K-CYo-sll is described as Interbedded sandstone, siltstone, shale, and claystone; characteristically glauconitic.

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 places recognised as having heritage values relevant to the Project Area.

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

A desktop assessment of Aboriginal heritage values and traditional uses was undertaken by Horizon Heritage in 2021 (Attachment 7 Desktop Heritage Report) and onsite heritage surveys were completed by Trace Enterprises.

The desktop assessment indicated that one known registered Aboriginal Heritage site extends onto the northern section of the Project Area, the Gingin Brook Waggy Site (Attachment 7 Desktop Heritage Report, Map 2, pp 16). The section that intersects the Project Area is the public boundary of the site and not actual

boundary of the registered site as administered by DPLH. The register lists the site type as historical, mythological, camp, hunting place, plant resource and water source. The site file and site boundary have access restrictions, however image will not be impacting this site.

Moore River is located north of the Project Area and is an important landscape feature connected with Yued Noongar Waugal mythological associations. The Moore River has intrinsic spiritual and ceremonial importance and is considered to form the basis of the underlying wellbeing of the Yued Noongar people (Attachment 7 Desktop Heritage Report, Section 7.3, pp 18).

A heritage survey was conducted during two trips in October 2023 and March 2024 for the larger Bidaminna Project. This report is still in preparation however preliminary information has been provided where applicable. The survey involved members of Yued Cultural Consultants, Field Representatives and Community Affairs Advisors. The survey concluded that no heritage sites or any other heritage materials were identified and no isolated artefacts were identified. There was a stone that was photographed and marked as a possible stone artefact which was later determined not to be an artefact. The area marked as a Potential Area of Concern is unlikely to meet the requirements of Section 5 and Section 39 of the *Aboriginal Heritage Act 1972*.

The Moore River is a DPLH Registered Aboriginal Heritage Site and is of cultural significance to the Yued People. The Proposed Action will not be impacting the Moore River (DPLH ID 20749).

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. *

A groundwater report is being prepared for the larger Bidaminna Project. The report is still in preparation however preliminary information provided by MWES Consulting has been provided below. The surface water information on the receiving environment has been sourced from a Surface Water Assessment undertaken by MWES Consulting (Attachment 6 Surface Water Report)

- The Bassendean Sand and underlying Yoganup Formation are the main part of the Superficial Aquifer. They are composed almost entirely of quartz sand to a relative depth of 15 - 25m Australian Height Datum (AHD). This aquifer is highly permeable with hydraulic conductivities ranging from 10 - 15m/day;
- The underlying Ascot Formation contains the deeper orebody and is also part of the Superficial Aquifer system. It overlies a shale and siltstone aquitard, the Kardinya Shale member of the Osborne Formation at a relative depth of -2 to +3mAHD. The top of the Ascot Formation aquifer contains calcareous sands with layers of quartz sands that transition to underlying variably cemented calcarenite. A thin, hard limestone layer is often intersected near the base of this sequence. The transition to calcarenite is at 5 – 15 mAHD, but usually around 12 mAHD. This aquifer is less permeable with a hydraulic conductivity of 3.9 m/day;
- Moore River is located north of the Project Area and flows east to west into the Guilderton estuary (Attachment 6 Surface Water Report, Figure 5, pp 10);
- The majority of Moore River streamflow north of the Project Area originates from the middle of the Moore River catchment. Apart from the Moore River, surface drainage features are poorly developed or absent in the vicinity of the Project Area (Attachment 6 Surface Water Report, Section 3.4, pp 6);
- Surface drainage is limited by the coarse sandy substrates, low surface gradients and incoherent landform which is partitioned by dunes at a variety of orientations (Attachment 6 Surface Water Report, Section 3.5, pp 8);

- Field inspection confirmed the absence of any indication of concentrated surface water flow across the site (Attachment 6 Surface Water Report, Section 3.5, pp 11);
- The Project Area is elevated and well drained, the site is not prone to flooding from Moore River (Attachment 6 Surface Water Report, Section 5, pp 16); and
- The Project Area is approximately 16.3 km to the east of the Seaview Park Reserve Public Drinking Water Source Area.

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. *

No World Heritage sites occur within or in proximity to the Project Area. The closest World Heritage site is Shark Bay approximately 448 km north of the Project Area.

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. *

No National Heritage sites occur within or in proximity to the Project Area. The closest National Heritage site is Lesueur National Park, approximately 105 km north of the Project Area.

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.

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. *

No Ramsar Wetlands occur within or in proximity to the Project Area. The closest Ramsar Wetland is Forrestdale and Thomsons Lakes, approximately 117 km south of the Project Area.

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	No	<i>Andersonia gracilis</i>	Slender Andersonia
No	No	<i>Anigozanthos viridis</i> subsp. <i>terraspectans</i>	Dwarf Green Kangaroo Paw
No	No	<i>Banksia mimica</i>	Summer Honeypot
No	No	<i>Caleana dixonii</i>	Sandplain Duck Orchid
No	No	<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
No	No	<i>Calidris ferruginea</i>	Curlew Sandpiper
No	No	<i>Dasyurus geoffroii</i>	Chuditch, Western Quoll
No	No	<i>Drakaea elastica</i>	Glossy-leaved Hammer Orchid, Glossy-leaved Hammer Orchid, Warty Hammer Orchid
No	No	<i>Eleocharis keigheryi</i>	Keighery's Eleocharis
No	No	<i>Grevillea curviloba</i> subsp. <i>incurva</i>	Narrow curved-leaf Grevillea
No	No	<i>Leipoa ocellata</i>	Malleefowl
No	No	<i>Macarthuria keigheryi</i>	Keighery's Macarthuria
No	No	<i>Macroderma gigas</i>	Ghost Bat
No	No	<i>Nannatherina balstoni</i>	Balston's Pygmy Perch
No	No	<i>Numenius madagascariensis</i>	Eastern Curlew, Far Eastern Curlew
Yes	Yes	<i>Pseudemydura umbrina</i>	Western Swamp Tortoise
No	No	<i>Rostratula australis</i>	Australian Painted Snipe
No	No	<i>Tringa nebularia</i>	Common Greenshank, Greenshank
Yes	Yes	<i>Zanda latirostris</i>	Carnaby's Black Cockatoo, Short-billed Black-cockatoo

Ecological communities

Direct impact	Indirect impact	Ecological community
Yes	Yes	Banksia Woodlands of the Swan Coastal Plain ecological community
No	No	Tuart (<i>Eucalyptus gomphocephala</i>) Woodlands and Forests of the Swan Coastal Plain ecological community

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. *

Fauna

The Proposed Action has the potential to result in direct and indirect impacts to Carnaby's Cockatoo (*Calyptorhynchus latirostris*) through low impact disturbance of up to 5 ha of native vegetation. Potential impacts to Carnaby's Cockatoo are described below.

Direct Impacts:

- Disturbance of up to 5 ha of foraging habitat; and
- Mortality and injury of individuals from vehicle strike (unlikely).

Indirect Impacts:

- Potential indirect impacts to habitat health; and
- Alterations to behaviour as a result of noise.

A translocated population of Western Swamp Tortoise is known from the Moore River Nature Reserve in the south-east portion where clay soils occur. The Project Area is approximately 10 km northwest of the release location. Previous monitoring has shown that some of the tortoises moved into a swamp 1 km southeast of the release site. The Project Area does not contain suitable swamps for the species but may provide suitable habitat for aestivating individuals. A targeted search within a portion of the Project Area failed to locate any evidence of aestivating tortoises (Attachment 10 Fauna Report, Table 5.1, pp 71). If any aestivating tortoises are present during commencement of the Proposed Action, there is potential for individuals to be directly impacted and therefore pre-clearance surveys are proposed. The likelihood of the Western Swamp Tortoise occurring is Medium (Attachment 10 Fauna report, Table 5.1, pp 71).

Flora

A detailed flora and vegetation survey was undertaken in 2021 and 2022 and 282 native plant taxa were recorded during the surveys, consisting of one native cycad and 281 species of native flowering plants, as well as two weed species. Native species counts were assessed as moderate for the size of the area surveyed. No Threatened Flora species were recorded during the surveys.

Potential impacts to flora are described below:

Direct:

- Clearing resulting in the direct disturbance of individuals.

Indirect:

- Indirect impacts associated with dieback and contamination.

An assessment for the likelihood of occurrence was conducted for significant Flora previously recorded within 10 km radius of the survey area (from DBCA database searches, September 2021 and updates) and for the Protected Matters search results of federally listed Threatened flora (EPBC Act). Based on this initial assessment, the following Threatened Flora were considered likely to occur:

- *Ptychosema pusillum* (Vulnerable) (Low to Moderate);
- *Paracaleana dixonii* (*Caleana dixonii*) (Critically Endangered) (Low to moderate);

- *Andersonia gracilis* (Critically Endangered) (Moderate);
- *Anigozanthos viridis* subsp. *Terraspectans* (Vulnerable) (Moderate);
- *Lepidosperma rostratum* (Critically Endangered) (Moderate); and
- *Macarthuria keigheryi* (Critically Endangered) (Moderate).

Threatened flora records (if found) will be avoided by the Proposed Action.

Ecological Communities

The DBCA database search showed that the '*Banksia* Woodlands of the Swan Coastal Plain ecological community' TEC (Endangered) (Banksia Woodland TEC) occurred in the survey area.

The Protected Matters search listed the following TECs:

- Banksia Woodland TEC ('likely to occur');
- 'Clay Pans of the Swan Coastal Plain' (Critically Endangered) ('likely to occur');
- 'Empodisma peatlands of southwestern Australia' (Endangered) ('may occur');
- 'Honeymyrtle shrubland on limestone ridges of the Swan Coastal Plain' (Critically Endangered) ('may occur'); and
- 'Tuart (*Eucalyptus gomphocephala*) Woodlands and Forests of the Swan Coastal Plain ecological community' (Critically Endangered) ('likely to occur').

Of these, only the Banksia Woodland TEC was recorded in the survey area (Attachment 13 Figure Recorded TECs) (refer below).

The *Banksia* woodland units in the survey area, 'BaBm', 'BaBmBi', 'Bi' and 'Bp', meet the criteria to be characterised as the federally listed TEC Banksia Woodland TEC (Attachment 14 Figure Veg Types). An assessment of the *Banksia* woodland units in the survey area against the diagnostic criteria for the Banksia Woodland TEC found that all the mapped areas of the units 'BaBm', 'BaBmBi', 'Bi' and 'Bp' met the criteria for the TEC. However, vegetation condition thresholds for minimum 'patch' size apply in assessing if an area of Banksia woodland qualify as Banksia Woodland TEC. For *Banksia* woodland to be considered as part of the TEC, 'a patch should meet at least the Good Condition category' and 'no minimum patch size applies' for areas in 'Pristine' condition. The Banksia Woodland TEC in the survey area is calculated to be 1,764.2 ha in area.

Vegetation condition was considered to be 'Pristine' for most of the Banksia woodland areas and most of the dampland shrublands/heaths. This is reflected in the fact that no weeds were recorded in 31 of the 49 quadrats in the survey area.

The Proposed Action will result in direct and indirect impacts to Banksia Woodland TEC through low-impact disturbance up to 5 ha of native vegetation. Potential impacts to Banksia Woodland TEC are described below.

Direct Impacts:

- Direct disturbance of Banksia Woodland TEC understorey.

Indirect Impacts:

- Potential indirect impacts associated with dieback and contamination.

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. *

The key impacts of the Proposed Action include disturbance of understorey native vegetation that is representative of the Banksia Woodlands TEC, foraging habitat for Carnaby's Cockatoo and potentially aestivating habitat for the Western Swamp Tortoise.

No Carnaby's Cockatoo breeding or roosting habitat was observed within the survey area (Attachment 10 Fauna Report; Section 4.1, pp 36). The Carnaby's Cockatoo was recorded on four occasions inside the Survey Area, two records were made of the species flying over the survey area and an additional two records were made via foraging evidence. This species has previously been recorded inside the survey area on five occasions and there are over 300 records from the area surrounding the survey area.

The Proposed Action will result in 5 ha of disturbance to understorey foraging habitat associated with Banksia Woodlands, this equates to 0.3% of the recorded habitat within the survey area, and the majority of which is limited to raised blade clearing for drilling activities.

Image will undertake track rolling where possible to avoid mechanical clearing of vegetation. This method of disturbance is considered to be low impact. This approach will be more favourable for promoting regrowth over conventional methods (like mulching or clearing). Image is committed to minimising impacts as far as possible and will avoid impacts to dominant *Banksia* sp. and other co-dominant tree species that are key characteristics of the Banksia Woodland TEC. Only part (groundcover and understorey) of the TEC will be impacted therefore disturbance for drilling activities should be considered a minor impact to Banksia Woodlands TEC. This approach also avoids mature foraging species for the Black Cockatoo.

Mature foraging species are unlikely to be disturbed and the majority of native vegetation subject to disturbance (track rolling) is expected to recover in the short term. Based on the discussion above, Image has determined that impacts from the Proposed Action are not significant.

The Western Swamp Tortoise was not identified during the detailed fauna survey or during the pre-clearance survey. The Project Area does not contain any suitable swamps for the species. There is some uncertainty whether the Project Area is used as aestivating habitat. However, Image intends to complete pre-clearance surveys and any individuals identified will be avoided.

Based on the discussion above, Image has determined that impacts from the Proposed Action are not significant.

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. *

As discussed in Section 4.1.4.6, the Proposed Action is not expected to have a significant residual impact on any protected matters.

Image has extensively planned the Proposed Action and will continue to undertake planning and refinements of the drilling to limit the extent and magnitude of impacts. The information provided in the baseline and targeted surveys were used to identify areas of significance, refine the activities, and determine mitigation and avoidance strategies. Image has quantified and assessed the significance of the impacts from the Proposed Action against the environmental values of the Project Area. The assessment has considered the impacts in a local, regional and cumulative context.

The Proposed Action will impact only 5 ha of native vegetation which represents only 0.2% of the surveyed extent of Banksia Woodlands TEC and 0.2% of local Carnaby's Cockatoo foraging habitat. In addition to the relatively small impact proposed, the nature of the clearing (avoiding large trees and track rolling for access) means the native vegetation is likely to recover relatively quickly.

Image has determined that with the implementation of the avoidance and mitigation measures proposed, impacts from the Proposed Action on protected matters are not determined to be significant and therefore the Proposed Action should not be considered a Controlled Action. A 'not a controlled action – particular manner' is expected to be appropriate in this case.

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. *

Image has commissioned ecological surveys within and surrounding the development envelope to determine potential MNES impacted by the Proposed Action. Information from these surveys was used to refine the design and footprint of the Proposed Action to ensure that potential impacts are avoided and minimised as much as possible.

To avoid significant impacts to Carnaby's Black Cockatoo:

- Prior to commencement of the Action, Image will record the location of all Eucalyptus trees with a DBH of at least 500 millimetres (mm) within any portion of the Action area where disturbance is to occur;
- Within the 48 hours prior to drilling in any portion of the Action area, the person taking the Action must inspect all Eucalyptus trees within that portion of the Action area to determine if any hollows are being utilised by Carnaby's Cockatoo;
- In respect of each Eucalyptus tree with a DBH of at least 500 mm, Image will not:
 - Clear within 2 times the height of that tree from the edge of the tree canopy of that tree; and
 - Drill within 2 times the height of that tree from the edge of the tree canopy of that tree.

To minimise the impact of the activities on the environment, Image proposes the following control measures:

- Complete pre-clearance surveys for aestivating Western Swamp Tortoises and avoid any located where Tortoises are found;
- The extent of vegetation disturbance is limited to 5 ha;
- The method of vegetation clearing is limited to raised blade clearing for access tracks;
- Image will implement the Exploration Environmental Management Plan, (Attachment 15 EEMP). Mitigation measures in this referral are in addition to those proposed in the EEMP;
- The extent of vegetation clearing will be managed through internal ground disturbance procedures;
- Environmental surveys have been completed to identify and avoid areas of environmental significance;
- Image will conduct line surveys prior to moving to each drill hole to determine and choose the 'path of least resistance', minimising the extent of disturbance to larger shrubs and trees;
- Disturbance areas will be identified using GPS coordinates and demarcated using tape and pickets;
- Mapped disturbance areas will be provided to operators to restrict disturbance to mapped areas only;
- All rubbish will be managed appropriately and taken off site for disposal;
- Activities are limited to drilling (geological and hydrological investigations) and clearing for access;
- Materials used for demarcation will be removed once the Proposed Action is complete;
- Access will be via existing tracks where possible;
- All vehicles, equipment and personnel will be inspected and cleaned as required to prevent the incidental spread of weeds and dieback;
- Prior to traversing vegetation, Image personnel will walk the intended path to spot vertebrate fauna to prevent injury or death; and
- Fauna injuries or fatalities will be reported to Image environmental personnel.

Image has limited the scope of drilling activities to minimise impacts as far as practical, Drilling activities are limited to:

- Access to drill sites will be raised blade clearing;
- Drilling and collection of sample material using a low impact rig;
- All waste (excess cuttings and intercepted ground water) will be collected and removed;

- A small area of vegetation and topsoil will be cleared (by hand) to provide a safe working area around the drill rig. This topsoil will be used to rehabilitate drill holes once they are no longer required; and
- Relocation of deadwood (fallen timber and logs) by hand.

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

No offsets are being proposed for this Proposed Action. Impacts to protected matters can be suitably minimised through mitigation measures so that there are no significant residual impacts expected.

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	<i>Actitis hypoleucos</i>	Common Sandpiper
No	No	<i>Apus pacificus</i>	Fork-tailed Swift
No	No	<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
No	No	<i>Calidris ferruginea</i>	Curlew Sandpiper
No	No	<i>Calidris melanotos</i>	Pectoral Sandpiper
No	No	<i>Motacilla cinerea</i>	Grey Wagtail
No	No	<i>Numenius madagascariensis</i>	Eastern Curlew, Far Eastern Curlew
No	No	<i>Tringa nebularia</i>	Common Greenshank, Greenshank

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. *

Spectrum identified one Migratory species with a Medium likelihood of occurring within the Project Area, the Fork-tailed Swift (Attachment 10 Fauna Report, Table 5.1, pp 66). The Fork-tailed Swift may occur infrequently within the Project Area due to the association with storm fronts, however use of the Project Area would be limited to flying over for foraging (Attachment 10 Fauna Report, Table 5.1, pp 66). The disturbance of 5 ha of vegetation is unlikely to have any impact on the Fork-tailed Swift.

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 include any actions that would involve nuclear exposure above natural levels.

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.

—

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. *

The Proposed Action will occur on land.

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 Proposed Action is in WA.

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 a coal mining or coal seam gas 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.

—

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 will not occur within Commonwealth Land. The closest Commonwealth Land to the Proposed Action is Lancelin Defence Training Area, approximately 30 km north of the Project Area.

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.

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.

*

No activity is being proposed in any places overseas.

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. *

Image wishes to conduct further exploration activities to determine a more accurate Mineral Resource Estimate. This estimate is required to define the viability of the Bidamina Project. The current design has been developed to minimise the environmental and social impacts as much as possible while maintaining investment viability for the Proposed Action.

5. Lodgement

5.1 Attachments

1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 1 Figure Regional Location.pdf Attachment 1 Figure Regional Location		No	High
#2.	Document	Attachment 2 Figure Project Area.pdf Attachment 2 Figure Project Area		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	Attachment 3 Environmental Policy.pdf Attachment 3 Environmental Policy		No	High

2.2.5 Tenure of the action area relevant to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 4 Figure Tenure.pdf Attachment 4 Figure Tenure		No	High

3.1.1 Current condition of the project area's environment

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 5 Figure Veg Condition.pdf Attachment 5 Figure Veg Condition		No	High
#2.	Document	Attachment 6 Surface Water Report.pdf Attachment 6 Surface Water Report		No	High

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

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 6 Surface Water Report.pdf Attachment 6 Surface Water Report		No	High
#2.	Document				

Attachment 7 Desktop Heritage Report.pdf Attachment 7 Desktop Heritage Report	No	High
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3.1.4 Gradient relevant to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 6 Surface Water Report.pdf Attachment 6 Surface Water Report		No	High
#2.	Document	Attachment 8 Figure Land Systems.pdf Attachment 8 Figure Land Systems		No	High

3.2.1 Flora and fauna within the affected area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 10 Fauna Report.pdf Attachment 10 Fauna Report		No	High
#2.	Document	Attachment 9 Figure Desktop TEC.pdf Attachment 9 Figure Desktop TEC		Yes	High
#3.	Link	Vegetation of Western Australia [cartographic material] / compiled by J.S. Beard...; prepared by the https://catalogue.nla.gov.au/catalog/200493			High

3.2.2 Vegetation within the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 11 Figure Pre-European Veg.pdf Attachment 11 Figure Pre-European Veg		No	High
#2.	Document	Attachment 12 Figure IBRA Subregion.pdf Attachment 12 Figure IBRA Subregion		No	High
#3.	Document	Attachment 5 Figure Veg Condition.pdf Attachment 5 Figure Veg Condition		No	High

3.3.2 Indigenous heritage values that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 7 Desktop Heritage Report.pdf Attachment 7 Desktop Heritage Report		No	High

3.4.1 Hydrology characteristics that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 6 Surface Water Report.pdf Attachment 6 Surface Water Report		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	Attachment 10 Fauna Report.pdf Attachment 10 Fauna Report		No	High
#2.	Document	Attachment 13 Figure Recorded TECs.pdf Attachment 13 Figure Recorded TECs		No	High
#3.	Document	Attachment 14 Figure Veg Types.pdf Attachment 14 Figure Veg Types		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	Attachment 10 Fauna Report.pdf Attachment 10 Fauna Report		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	Attachment 15 EEMP.pdf Attachment 15 EEMP		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	Attachment 10 Fauna Report.pdf Attachment 10 Fauna Report		No	High

5.2 Declarations

Completed Referring party's declaration

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

ABN/ACN	85137515078
Organisation name	Preston Consulting Pty Ltd
Organisation address	Level 1, 226 Adelaide Terrace, Perth, Western Australia, 6000
Representative's name	Phoebe Ranford
Representative's job title	Environmental Consultant

Phone 0427080869
Email pranford@prestonconsulting.com.au
Address Level 1, 226 Adelaide Terrace, Perth, Western Australia, 6000

- 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, **Phoebe Ranford of Preston Consulting Pty Ltd**, 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 57063977579
Organisation name IMAGE RESOURCES NL
Organisation address Level 2, 1 Walker Avenue West Perth, Western Australia. 6005
Representative's name Graeme Kininmonth
Representative's job title Senior Consultant
Phone (08) 9485 2410
Email gkininmonth@imageres.com.au
Address Level 2, 1 Walker Avenue West Perth, Western Australia. 6005

- 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, **Graeme Kininmonth of IMAGE RESOURCES NL**, 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, **Graeme Kininmonth of IMAGE RESOURCES NL**, 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. *