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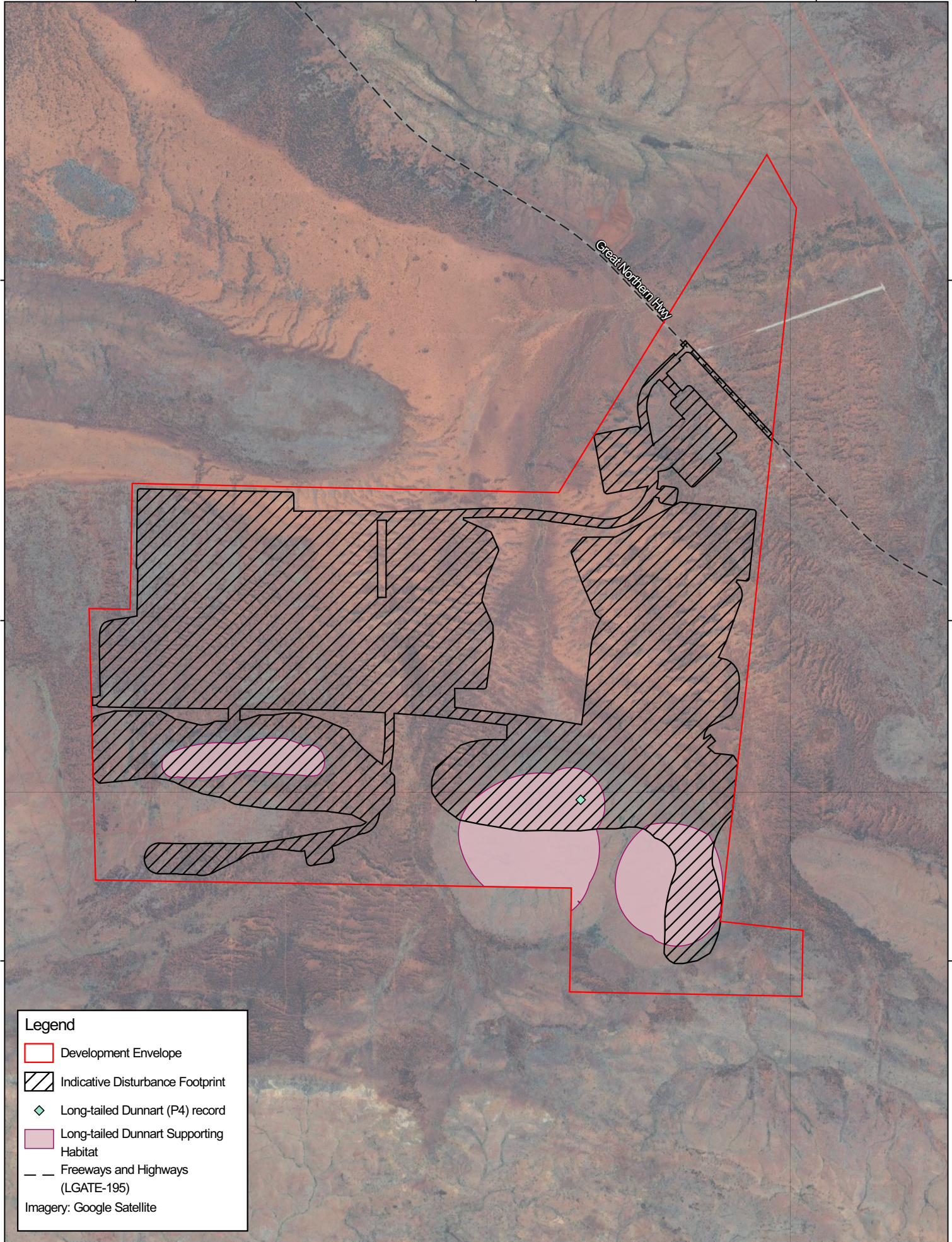
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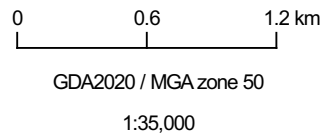
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Legend

- Development Envelope
 - Indicative Disturbance Footprint
 - ◆ Long-tailed Dunnart (P4) record
 - Long-tailed Dunnart Supporting Habitat
 - Freeways and Highways (LGATE-195)
- Imagery: Google Satellite



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 Date: 22/05/2026
 Size: A4
 Author: ASmithers



Figure 4-10: Potential impacts to Long-tailed Dunnart habitat

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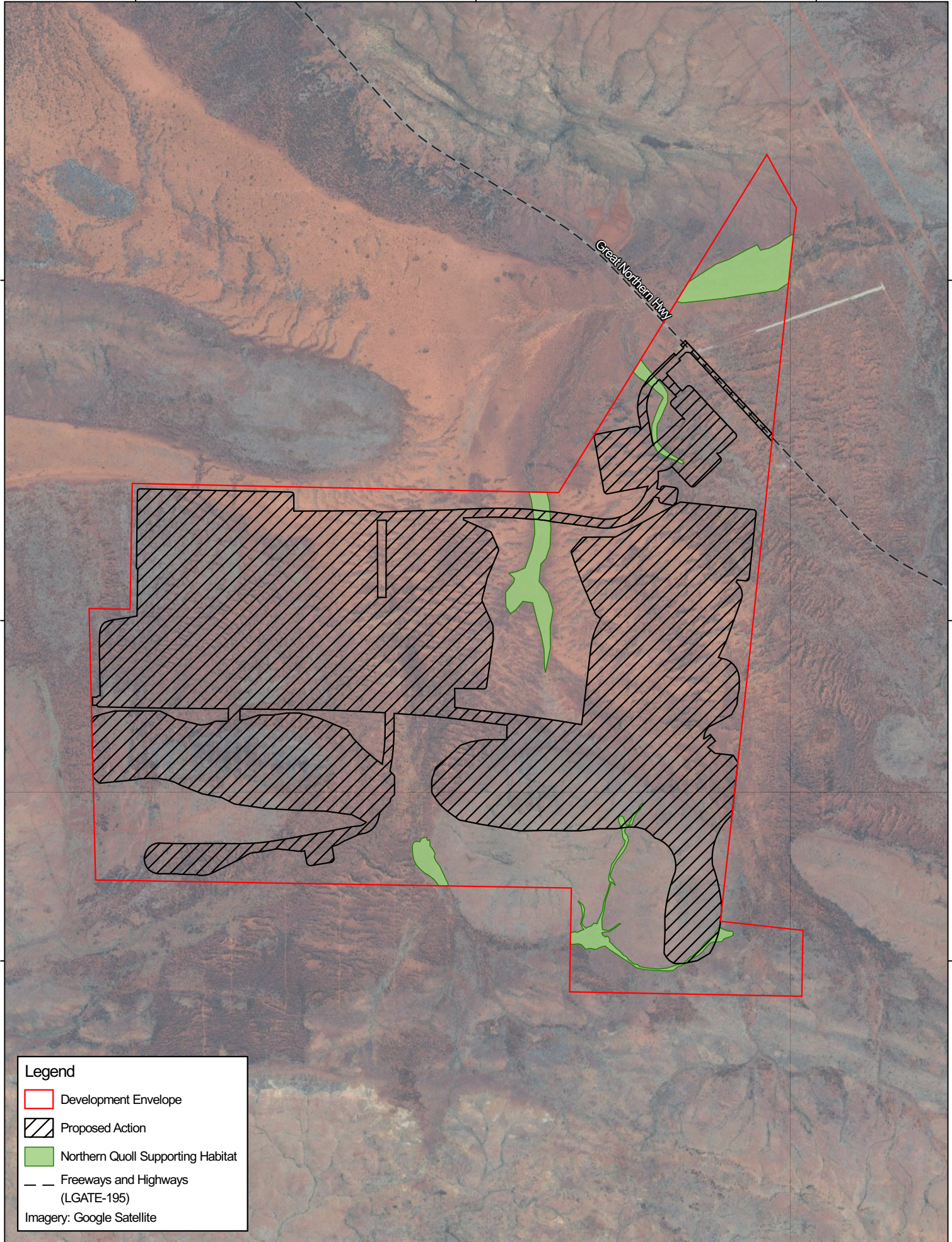
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Legend

- Development Envelope
- Proposed Action
- Northern Quoll Supporting Habitat
- Freeways and Highways (LGATE-195)

Imagery: Google Satellite

0 0.6 1.2 km

GDA2020 / MGA zone 50

1:35,000



Project: 0612_ROU_008
 Date: 22/05/2026
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Figure 4-11: Potential impacts to potential Northern Quoll dispersal habitat

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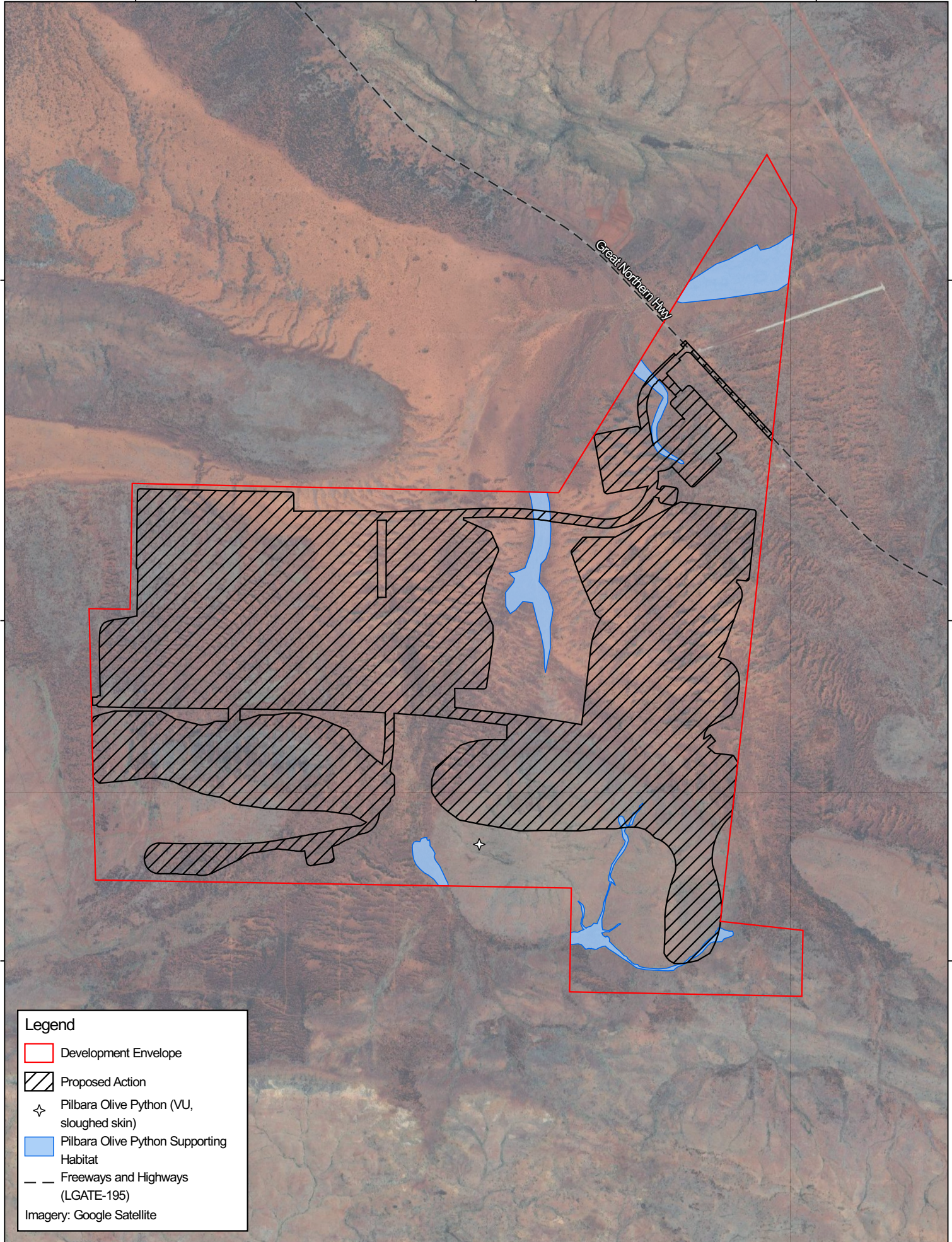
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Legend

- Development Envelope
- Proposed Action
- ✦ Pilbara Olive Python (VU, sloughed skin)
- Pilbara Olive Python Supporting Habitat
- Freeways and Highways (LGATE-195)

Imagery: Google Satellite

0 0.6 1.2 km

GDA2020 / MGA zone 50

1:35,000



Project: 0612_ROU_005
 Date: 22/05/2026
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HANCOCK PROSPECTING

Figure 4-12: Potential impacts to Pilbara Olive Python foraging habitat

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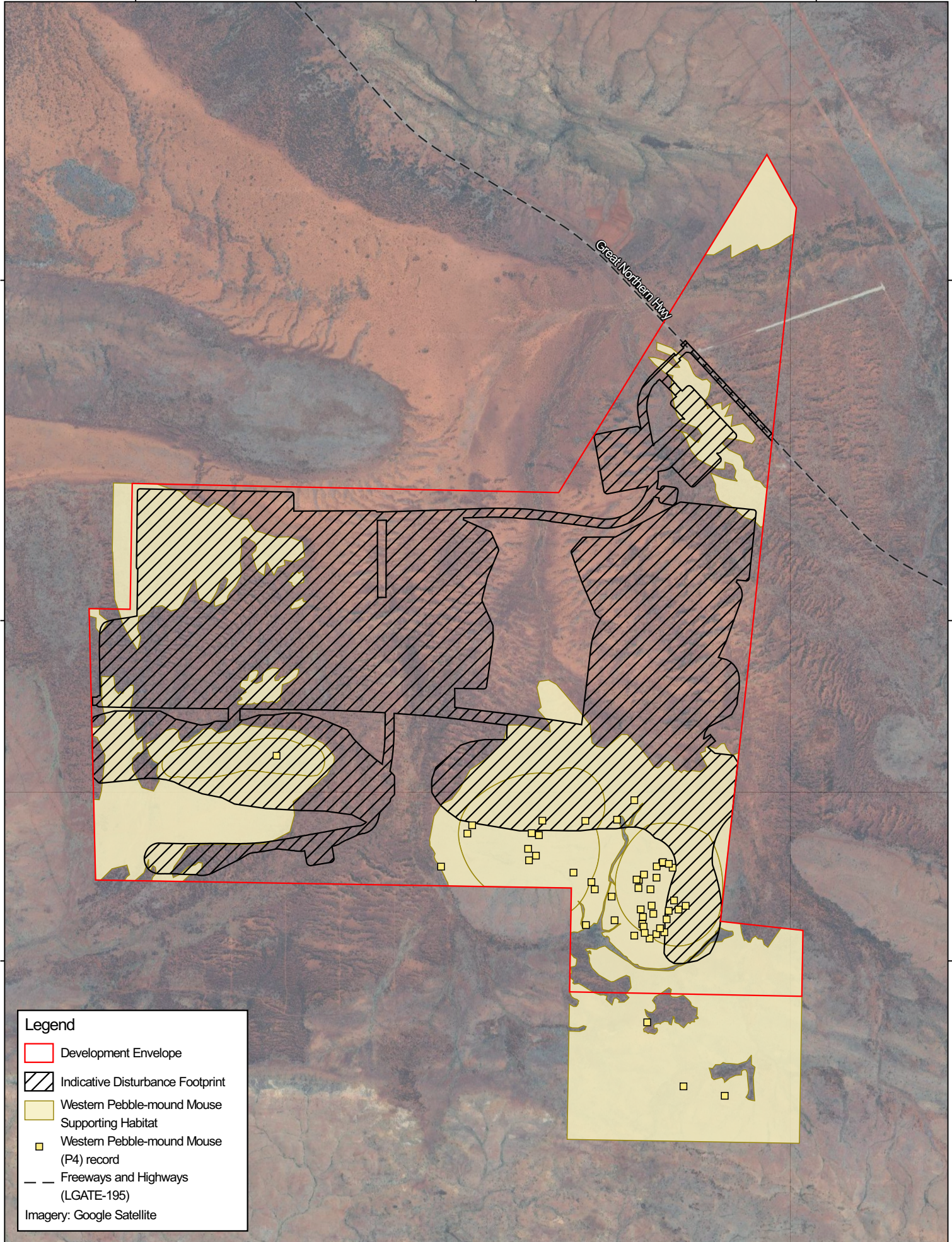
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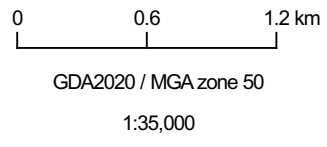
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Legend

- Development Envelope
 - Indicative Disturbance Footprint
 - Western Pebble-mound Mouse Supporting Habitat
 - Western Pebble-mound Mouse (P4) record
 - Freeways and Highways (LGATE-195)
- Imagery: Google Satellite



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Figure 4-13: Potential impacts to Western Pebble-mound Mouse habitat

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4.6 Assessment of Significance of Residual Impacts

4.6.1 General Fauna and Associated Habitat

4.6.1.1 Proposal

4.6.1.1.1 Habitat Loss

The Proposal will result in the loss of 989 ha of native fauna habitats (Table 4-8). An assessment of the impacts of the direct disturbance of fauna habitat has been provided in Table 4-9. Where more detail is warranted (i.e., for specific species), it has been provided in subsequent sections.

Table 4-9: Impacts to fauna habitat

Significant Fauna	Fauna Habitat					Total in Indicative DF
	Spinifex stony plains and rises	Mulga woodlands	Tussock grassland	Rocky hill	Drainage	
Gane's Blind Snake	Nil	Nil	Nil	Supporting	Shelter, foraging and/or dispersal	99.0 ha
Ghost Bat	Supporting	Supporting	Nil	Nil	Shelter, foraging and/or dispersal	532.6 ha
Grey Falcon	Supporting	Nil	Supporting foraging	Supporting	Shelter, foraging and/or dispersal	696.2 ha
Long-tailed Dunnart	Nil	Nil	Nil	Supporting	Nil	95.0 ha
Northern Quoll	Nil	Nil	Nil	Supporting	Shelter, foraging and/or dispersal	99.0 ha
Pilbara Olive Python	Nil	Nil	Nil	Nil	Shelter, foraging and/or dispersal	4.0 ha
Western Pebble-mound Mouse	Supporting	Nil	Nil	Supporting	Nil	331.6 ha

As stated above, none of these habitats are restricted to the DE and will remain well represented within the Survey Area and the surrounding region.

Rocky hill and Drainage habitat types have elevated fauna values and specific limits have been proposed in Section 4.4.2 to ensure that disturbance is minimised in these areas.

Given the widespread nature of the habitats within the DE, impacts at broad fauna habitat scale are therefore more relevant when assessed on a cumulative basis, as detailed in the section below.

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4.6.1.1.2 Fauna Vehicle Strike

There is a risk of fauna death or injury during clearing, mining, or transport. The majority of birds and larger fauna would be expected to disperse from the areas to be cleared as the equipment approaches. It is possible however that there will be some fauna injuries or deaths during these activities. Vehicle strike may lead to fauna injuries or fatalities as light vehicles and trucks will regularly use the access road. Vehicles will be speed restricted along the access road to reduce the likelihood of vehicle strike.

HPPL will implement management measures to minimise this likelihood (refer to Section 4.4.2).

Based on the above, any fauna strike impacts are likely to be rare and not significant on a local or regional scale.

4.6.1.1.3 Feral Fauna

Introduced species were recorded in fauna surveys within the Survey Areas including the European cow (*Bos primigenius taurus*), dromedary camel (*Camelus dromedarius*), feral cat (*Felis catus*), and house mouse (*Mus musculus*) (Rapallo, 2025a). The Proposal has the potential to introduce additional species or increase the population of existing introduced species, through the following vectors:

- Food wastes at work areas; or
- Presence of additional cleared corridors that may be utilised by introduced fauna for access or predation.

The appropriate management and disposal of food wastes will minimise the attraction of feral fauna to the area. No pets will be brought to site. Feral animal controls (eradication) are proposed if required, such as a notable number of sightings, or evidence of predation on native fauna.

With the implementation of controls, potential introduced fauna impacts described above are expected to be able to be appropriately mitigated such that impacts to native fauna are not significant on a local or regional scale.

4.6.1.1.4 Weeds

Weeds have the potential to outcompete and displace native fauna habitat if introduced or conditions are altered to favour their growth. Weeds may be spread and/or introduced by vehicles and equipment, resulting in soil and weed vegetative material being transported around site and being present on equipment entering and exiting site.

Four introduced species were identified during the Rapallo (2024) Survey. None of the weeds recorded during the survey were considered WoNS (Centre for Invasive Species Solutions, 2021), or were they listed as declared pests, prohibited, or requiring a permit under the BAM Act, nor were any of them identified by DBCA as 'Priority Alerts' for the Pilbara region.

Weed control measures are considered suitable to minimise the risk of weed introduction and control the risk of spread.

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4.6.1.1.5 Altered Fauna Behaviour

The Proposal will produce low levels of artificial light and noise emissions. Equipment moving within the mining area will produce noise emissions however during operations this will be limited to the mining DF. Nevertheless, it is expected that some fauna will keep their distance from the mining area while operating. With the implementation of controls potential increased risks to fauna from light or noise emissions are expected to be able to be appropriately mitigated such that impacts are not significant on a local or regional scale.

4.6.1.2 Cumulative Impacts

Cumulative impacts to general fauna habitat in the region is best assessed in the context of remaining extent. This assessment was conducted in terms of total remaining native vegetation in Section 3.6.1. The findings of that assessment identified that all of the vegetation associations that will be impacted will have more than 98% of their pre-European extent remaining (Table 3-11) after all current and planned projects are developed.

4.6.1.3 Summary

The Proposal will result in direct disturbance of approximately 989 ha of native fauna habitat, all of which is considered to be in Good to Excellent condition. While habitats were all noted to be widespread and common in the region, several provide suitable habitat for significant fauna species, discussed separately in the sections below.

It is noted that the Pilbara IBRA region has been identified by the EPA as being at risk of cumulative impacts, however, on a regional scale, cumulative impacts will represent only a small proportion of the remaining vegetation.

4.6.2 Significant Fauna

4.6.2.1 Proposal

4.6.2.1.1 Gane's Blind Snake

The Gane's Blind Snake was confirmed to occur within the Survey Area and is known to occur in the surrounding environment, with 17 records occurring within 50 km of the Proposal. Evidence of ants and some termites have been recorded within this species preferred habitat and as such a population is likely to persist within the Proposal.

As discussed above, the Proposal will result in the clearing of an estimated 97.8 ha of potential Gane's Blind Snake habitat (94.2 ha of Rocky Hill habitat and 5 ha of Drainage habitat). Specific limits have been proposed on each of these habitat types (105 ha and 5 ha respectively) to ensure that impacts to the habitat of this species is minimised. Using these limits, at least 42% of Rocky Hill habitat and 92.5% of Drainage habitat will remain within the Survey Area, with both habitats known to be well represented in the surrounding area.

The mitigation measures proposed to minimise indirect impacts are predicted to result in minimal impacts on habitat and behaviour of this species.

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Given the wide range of this species, the maximum loss of up to 99 ha habitat is considered unlikely to significantly impact the viability of this species.

4.6.2.1.2 Ghost Bat

The Ghost Bat was identified as potentially occurring within the DE; however, no sightings or evidence of its presence was observed during HPPL exploration activities, Aboriginal Heritage surveys, fauna surveys or flora and vegetation surveys (including foot traverses and targeted surveys). This species may occur across the habitats within the DE however only on occasion.

Endemic to Australia, the Ghost Bat population and distribution has declined significantly over the last 200 years and currently has a widespread but patchy distribution across northern Australia (Van Dyck & Strahan, 2008). In the Hammersley IBRA subregion, Ghost Bat populations are often widespread and small, with 1 to 15 individuals typically encountered within a roost, and an estimated population of 350 Ghost Bats across the whole subregion (Bullen, 2021a).

Ghost Bats are most commonly found roosting in caves and disused mineshafts in the Pilbara region, with these sites predominantly found in ironstone geologies (such as Brockman and Marra Mamba banded iron formation or Robe Pisolite channel iron deposit geology and granite rockpiles (Bullen, 2021a)). The availability of suitable roost caves is critical for the species' persistence and survival (Armstrong & Anstee, 2000). One such roost location with high use is located near the Survey Area at Rhodes Ridge (Bullen, 2021a). Ghost Bats are ubiquitous across Rhodes Ridge, to the northwest of the Survey Area, with a number of old mine adits north and south of the Proposal available for this species to roost in within approximately 12 km of the Survey Area (Bob Bullen, pers comms), although the exact locations of these roosts are not available. No caves or otherwise suitable roosting locations, such as adits, were observed in the Survey Area.

Foraging habitat for Ghost Bats is classified as occurring within 12 km radius of categorised caves (Biologic Environmental, 2020). Bullen (2021a) suggests the Ghost Bat prefer to forage on productive plain areas with thin mature woodland over patchy or clumped tussock or hummock grass (*Triodia* spp.) on sand or stony ground. Isolated trees and trees on the edge of thin thickets on the plains, or trees along the edges of watercourse woodlands, appear to be preferred vantage points for hunting.

Ghost Bats face a significant threat from fatal collisions with barbed wire fences (Woinarski et al., 2014; Threatened Species Scientific Committee, 2016). These incidents are most likely when the bats fly at high speeds close to the ground to conserve energy while commuting or foraging. The danger is heightened because pastoral fences are designed to be minimally visible, making them nearly invisible at night. Best practice in areas close to known Ghost Bat roosts has been to either replace barbed wire with plain wire strands, or to add bat deflectors to the fence (Bullen, 2021a). No barb wire fences will be installed at the Proposal.

Drainage, spinifex plains and rises and mulga woodlands were considered potential foraging habitat for the Ghost Bat. The Proposal will result in the clearing of approximately 532.2 ha of potential Ghost Bat foraging habitat (38% of the mapped extent within the Survey Area). While disturbance areas will change slightly during detailed mine planning, it is likely that at least 62% of foraging habitat will

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remain within the Survey Area, with all impacted habitats known to be well represented in the surrounding area.

The mitigation measures proposed to minimise indirect impacts are predicted to result in minimal impacts on habitat and behaviour of this species.

Given the wide foraging range of this species, the estimated loss of 532.2 ha of foraging habitat is considered unlikely to significantly impact the viability of this species, however given its conservation listing, the loss still represents a loss of habitat. As such offsets are proposed to counterbalance this residual impact (Section 5).

4.6.2.1.3 Grey Falcon

The Grey Falcon was identified as potentially occurring within the DE; however, no sightings or evidence of its presence was observed during HPPL's fauna surveys or any other activities including exploration activities, Aboriginal Heritage surveys, or flora and vegetation surveys (including foot traverses and targeted surveys). This species may potentially occur across the habitats within the DE, however only on occasion.

In the Pilbara region, Grey Falcons are considered rare throughout the Australian mainland, most common in arid inland areas with sporadic records near the coast, with their distribution centred around Australian arid and semi-arid zones (Marchant & Higgins, 1993; Falkenberg, 2011; Schoenjahn, 2013, 2018). This species demonstrates a preference for areas receiving less than 500 mm of rainfall annually.

Critical nesting habitat, such as tall trees along semi-permanent or permanent watercourses and tall artificial structures (e.g., telecommunication towers), is not present within the Survey Area. As a result, suitable nesting opportunities for the Grey Falcon are absent within the boundary of the proposed works. The species typically nests in the tallest trees along watercourses, in particularly river red gum (*Eucalyptus camaldulensis*) and white river gum (*Eucalyptus vitirix*), but and has also been documented nesting on telecommunication towers (Marchant & Higgins 1993; Schoenjahn 2013, 2018). These habitat features are present in the broader landscape but not within the Survey Area itself. The species is known to forage in open and sparsely vegetated habitats, including tussock grasslands, open woodlands, and treeless plains (Olsen & Olsen 1986; Garnett et al. 2011; Schoenjahn 2018). The lack of nesting structures within the Survey Area reduces the likelihood of the species occupying the site for breeding purposes. Based on the available habitat, the Grey Falcon may occasionally traverse or utilise parts of the Survey Area for opportunistic foraging. However, given the absence of suitable nesting habitat within the Survey Area and the species' typically low density, any use of the area is expected to be infrequent and limited in extent.

The Proposal will result in the clearing of approximately 694.5 ha of potential Grey Falcon foraging habitat (24% of the mapped extent within the Survey Area). While disturbance areas will change slightly during detailed mine planning, it is likely that at least 76% of foraging habitat will remain within the Survey Area, with all impacted habitats known to be well represented in the surrounding area.

The mitigation measures proposed to minimise indirect impacts are predicted to result in minimal impacts on habitat and behaviour of this species.

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Given the wide foraging range of this species, the estimated loss of 694.5 ha of foraging habitat is considered unlikely to significantly impact the viability of this species, however given its conservation listing, the loss still represents a loss of habitat. Offsets are proposed to counterbalance this residual impact (Section 5).

4.6.2.1.4 Long-tailed Dunnart

The Long-tailed Dunnart is patchily distributed through the Pilbara, northeastern Goldfields, and Gibson desert, south to the Nullarbor Plain, to central Northern Territory and western South Australia. Its core habitat includes rocky scree slopes with hummock grass and shrubs, and tall open Acacia shrubland and woodlands (Mckenzie et al., 2008), but is also known to inhabit stony soils with hummock grasses, flat-topped hills, sparse mulga over spinifex, lateritic plateaus, sandstone ranges, and breakaways (Western Australian Museum 2023).

Within the Survey Area, the Rocky Hill habitat may have the potential to support Long-tailed Dunnarts, and the populations may persist in areas with abundant invertebrate populations.

The Proposal will result in the clearing of up to 95 ha of supporting habitat for the Long-tailed Dunnart. Specific limits have been proposed on the Rocky Hill habitat type (95 ha) to ensure that impacts to the habitat of this species is minimised. Using this limit, at least 42% of Rocky Hill habitat will remain within the Survey Area, with this habitat known to be well represented in the surrounding area.

The mitigation measures proposed to minimise indirect impacts are predicted to result in minimal impacts on habitat and behaviour of this species.

Given the wide range of this habitat type, the maximum loss of up to 95 ha of habitat is considered unlikely to significantly impact the viability of this species.

4.6.2.1.5 Northern Quoll

The Northern Quoll was identified as potentially occurring within the DE; however, no sightings or evidence of its presence was observed during HPPL's exploration activities, Aboriginal Heritage surveys, fauna surveys or flora and vegetation surveys (including foot traverses and targeted surveys). This species may occur across the habitats within the DE, however only on occasion.

In the Pilbara just over 5% of males and 40% of females will survive to reach a second breeding season (Hernandez-Santin et al., 2019). A recent study into the home ranges of Northern Quoll in the Pilbara found that the average 95% home range for females is 19.8 ha although they may range from 0.5 - 63.65 ha, while males have a significantly bigger 95% home range at an average of 24.2 ha, ranging from 3.42 - 70.71 ha (Cowan et al., 2020).

The Northern Quoll is moderately common through parts of the Pilbara (within 150 km of the coast), usually where suitable rocky habitat is present, which provides denning habitat as well as safety from predators and fire (Hill & Ward, 2010; Turpin & Bamford, 2014). The species is both arboreal and terrestrial, inhabiting ironstone and sandstone ridges, scree slopes, granite boulders and outcrops, drainage lines, tree hollows, and riverine habitats (Braithwaite & Griffiths, 1994; Oakwood 2002). Habitat usually includes rocky areas or structurally diverse woodland or forest used for shelter, with surrounding vegetated habitats used for foraging and dispersal (DotEE, 2016b). Rocky habitats tend

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to support higher population densities, as they offer greater protection from predators and are generally more productive in terms of availability of resources (Braithwaite & Griffiths, 1994; Oakwood 2002).

Other microhabitat features important to the species include rock cover, proximity to permanent water and time since last fire (Woinarski et al., 2008). Close proximity to water sources has been suggested to correspond with higher juvenile recruitment rates (Braithwaite & Griffiths, 1994; Moore et al., 2019). Rocky-riparian areas may offer a protective environment where Northern Quolls can fulfill (most) of their shelter requirements (dens and temporary cover), and where relatively high floristic diversity and topographic complexity likely offer habitat resources for a relatively wider range of prey species (Hernandez-Santin et al., 2022).

In the Pilbara, shelter and denning habitats consists of rock habitats such as ranges, escarpments, mesas, gorges, breakaways, boulder fields, and major drainage lines (DotEE, 2016b). Rocky habitat is a preferred habitat of Northern Quoll, as they are likely less exposed to predation because it provides high densities of structural refuges (Hernandez Santin, 2016).

Within the Survey Area, the rocky hill habitat provides supporting habitat for shelter and foraging, although the shelter available is likely to be more short-term in nature due to majority of crevices and holes being either too shallow or too wide (thus allowing predators to enter) for long-term denning or breeding usage. Some cracks, crevices and holes of appropriate depth and size are present in this habitat, with the occasional tree hollow available, but not enough to support a large population of this species under current pressure of feral cats in the area. There is also a lack of permanent or semi permeant water sources within the Survey Area, which is a limiting factor for Northern Quoll within the arid environment of the Proposal. The remaining habitats may support this species for dispersal or foraging purposes, with prey species observed and the occasional temporary shelter, such as logs, dense spinifex, or rocky crevices, for a dispersing individual.

As discussed above, the Proposal will result in the clearing of up to 989 ha of fauna habitat, of which 5 ha is considered potential Northern Quoll dispersal habitat.

4.6.2.1.6 Pilbara Olive Python

The Pilbara Olive Python was recorded in 2023 within the DE in a rocky drainage gully via a sloughed skin observation.

Given the lack of at least semi-permanent water pools within the DE, it is unlikely to support a local population of these species and would be unlikely to occur outside wet season. However, the drainage lines within the Survey Area may provide suitable supporting foraging and dispersal habitat. The habitat of the Survey Area is not considered critical for this species which prefers rocky outcrops in proximity to deep gorges, gullies, and water holes, such as those found in the surrounding region.

As discussed above, the Proposal will result in the clearing of up to 989 ha of fauna habitat, of which 5 ha is considered Pilbara Olive Python dispersal and foraging habitat.

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4.6.2.1.7 Western Pebble-mound Mouse

Active, inactive, and extinct Western Pebble-mound Mouse mounds were recorded opportunistically within the Survey Area, often on rocky hill habitats or within stony plains and rises habitats. As shown by the mounds within the Survey Area and the abundance of grasses, seeds and insects recorded within the habitats, the species is capable of persisting within the Survey Area.

The spinifex plains and rises and rocky hill habitat may provide denning and foraging habitat for this species. The Proposal will require disturbance of up to 330.8 ha of this potential habitat (37% of the mapped extent within the Survey Area). Additionally, the Proposal may need to remove potential denning mounds that may be used sporadically by this species.

At least 63% of potential habitat will remain within the Survey Area, with this habitat known to be well represented in the surrounding area.

The mitigation measures proposed to minimise indirect impacts are predicted to result in minimal impacts on habitat and behaviour of this species.

Given the wide range of this species and its affected habitats, the maximum loss of up to 330.8 ha of habitat is considered unlikely to significantly impact the viability of this species.

4.6.2.2 Cumulative Impacts

The significant fauna listed above are listed species due to a number of threats, however a common threat is habitat degradation or loss. As stated in Section 3.6.1, all of the vegetation associations that will be impacted will have more than 98% of their pre-European extent remaining (Table 3-11) after all current and planned projects are developed. Broad habitat will therefore remain, however the range of other threats to these species mean that additional pressures from habitat loss could be considered significant.

4.6.2.3 Summary

The Proposal will result in direct disturbance of approximately 989 ha of native fauna habitat, all of which is considered to be in Good to Excellent condition and is utilised (or potentially utilised) by significant fauna species. While habitats were all noted to be widespread and common in the region, the loss of suitable habitat for Threatened Fauna species may be considered significant. If required, offsets may be utilised to counterbalance the impacts of the Proposal (Section 5). Offset requirements are likely to be a condition of approval if the Proposal is assessed under Part IV of the EP Act and will also apply if the Proposal is assessed under the EPBC Act.

4.6.3 Short Range Endemic Species

Section 4.3.1 identified that two SRE species (*Antichiropus cristatus* and *Missulena faulderi*) were only recorded within the indicative DF. No habitats were identified as being restricted to the indicative DF or DE. Neither of the two confirmed SRE species have been listed as threatened and both are known to occur outside of the Proposal. Given the small indicative DF, any impacts to these Confirmed SRE species are expected to be minor at a regional scale and are not likely to cause significant disturbances to their populations. In addition to the Confirmed SRE species, the SRE survey recovered one Likely

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Potential SRE (Antichiropus `BDI093'), 10 Unlikely Potential SREs, and 7 Data Deficient Potential SREs, all which correspond to undescribed taxa recognised only by their identification codes. Sixteen of these taxa are currently only known from the Proposal, however, given the widespread nature of the habitats they have been recorded from, none of these taxa is expected to have distributions restricted to the DE.

4.6.3.1.1 Direct Disturbance

Section 4.3.2.4 identified one potential SRE species and two known SRE species occurring within the Proposal. The Proposal disturbance is relatively small and significant proportions of each habitat will be retained. Although two Confirmed SRE species and one Likely Potential SRE species have been recorded from the Proposal, its development is not expected to significantly impact populations of these or any other taxa from SRE groups. The same applies for the identified SRE habitats, which are widespread on a regional scale.

4.6.3.1.2 Habitat

Section 4.3.2.4 provides a detailed assessment of indirect impacts on SRE fauna and their habitat, which showed that indirect impacts would be minimal outside the area of direct disturbance. This assessment is suitable for SREs also, with the Proposal considered unlikely to indirectly impact SRE habitat if the mitigation measures listed in Section 4.4 are implemented.

4.7 Environmental Outcomes

The EPA's environmental objective for this factor is to "protect terrestrial fauna so that biological diversity and ecological integrity are maintained". In the context of this objective: "ecological integrity" is listed as the composition, structure, function and processes of ecosystems, and the natural range of variation of these elements (EPA, 2016b).

HPPL has incorporated extensive avoidance, minimisation and rehabilitation measures into the Proposal design and operational processes, however some direct and indirect impacts to terrestrial fauna are unavoidable. The Proposal will result in disturbance to 989 ha of native terrestrial fauna habitat. All vegetation is considered to be in Good to Excellent condition. All of these habitats are however well distributed throughout the region and species that potentially use the DE generally have relatively wide-ranging distributions and/or will persist in adjoining unaffected areas given the presence of extensive areas of similar habitat nearby.

Significant fauna and SREs were recorded or considered likely to occur and there is the potential for habitat loss for several of these species.

The predicted outcomes for Terrestrial Fauna are therefore:

- Disturbance of no more than 989 ha of native fauna habitat;
- Ensure no disturbance or adverse impacts to more than:
 - 5 ha of Drainage habitat; and
 - 105 ha of Rocky Hill habitat.

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The above outcomes can all be assured by the conditions of a NVCP if the Proposal is not assessed under Part IV of the EP Act. Conditions within NVCPs will require the implementation of management strategies such as limits on native vegetation clearing and speed restrictions/vehicle management.

If assessment under Part IV of the EP Act is undertaken, then limits in the conditions of the Ministerial Statement that reflect the outcomes above would be appropriate.

An objective-based condition is considered to be appropriate for indirect impacts, for example:

“The proponent must ensure the implementation of the proposal achieves the following environmental objective:

Avoid, and where unavoidable, minimise impacts to terrestrial fauna, including Priority and Threatened Flora, and their habitat, from vehicle strike, dust emissions, or spread of environmental weeds, fire, altered hydrological regimes and contamination.”

Commitment to offsetting the residual impacts of the proposal, via either a Ministerial Statement or NVCP approval conditions, and their suitability of offsets as a management option, are discussed in the Offset section (Section 65).

Based on the above, HPPL considers that the Proposal can be implemented such that there are no significant residual impacts to this factor, and the EPA objective can be met.

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5 Social Surroundings

5.1 EPA Environmental Factor and Objective

The EPA Objective for this Environmental Factor is to protect social surroundings from significant harm.

5.2 Relevant Policy and Guidance

Relevant EPA and Commonwealth Government guidance documents for social surroundings are summarised in Table 5-1.

Table 5-1 Policy and guidance relevant to the Social Surroundings Environmental Factor

Policy and Guidance	How guidance has been considered
WA Government	
Key EPA documents	
Statement of Environmental Principles, Factors, Objectives and Aims of EIA (EPA, 2023b)	This document was considered in the preparation of this ERD and to inform EIA. It was used identify the Environmental Factors likely to be impacted by the Proposal and the EPA's objective for each factor.
EIA (Part IV Divisions 1 and 2) Procedures Manual (EPA, 2024b)	This document has been considered in planning for the Part IV approval process and has been used to inform the preparation of this ERD.
EIA (Part IV Divisions 1 and 2) Administrative Procedures (EPA, 2024c)	This document has been considered in planning for the Part IV approval process and has been used to inform the preparation of this ERD.
Instructions on how to prepare an Environmental Review Document (EPA, 2025a)	This document has been considered in planning for the Part IV approval process and has been used to inform the preparation of this ERD.
EIA Practice Guide (EPA, 2025b)	This document has been considered in planning for the Part IV approval process and has been used to inform the preparation of this ERD.
Cumulative Impact Guide (EPA, 2025c)	Not yet released. This document will be considered in a future revision of this ERD once it is released (expected to be in early 2026).
Relevant EPA Factor Guidelines	
Environmental Factor Guideline – Social Surroundings (EPA, 2023a)	This document was considered in the preparation of this section (Section 5) of the ERD.
Relevant EPA Technical Guidance	
INTERIM Technical Guidance Environmental impact assessment of Social Surroundings Aboriginal cultural heritage (EPA, 2023c)	This document has been considered in the design and planning of the Proposal, it has also been considered in the preparation of mitigation measures for the Proposal.
Commonwealth Government	
Key Documents	

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Policy and Guidance	How guidance has been considered
EPBC Act Condition Setting Policy (DAWE, 2020)	This document was used as guidance for the EIA and the development of mitigation measures and likely regulation of the Proposal.
EPBC Act Outcomes-based conditions policy (DotE, 2016)	This document was used as guidance for the EIA and the development of mitigation measures and likely regulation of the Proposal.
Relevant Technical Guidance	
Engage Early – Guidance for proponents on best practice Indigenous engagement for environmental assessments under the EPBC Act (DotE, 2016)	This document was used as guidance for assessment and management of physical and social impacts on Aboriginal Heritage.

5.3 Receiving Environment

5.3.1 Surveys and Studies

Site avoidance Aboriginal Heritage surveys have been conducted across the DE, with Site Investigation assessments in progress for some identified sites.

HPPL has commissioned KNAC to undertake a Traditional Ecological Knowledge (TEK) survey over the Proposal. Biologic Nature and Community Pty Ltd (Biologic) was then in turn engaged by KNAC to document the TEK survey and provide taxonomic confirmation of flora and fauna values of the Proposal (Biologic, 2025; Appendix 5.3).

Additionally, HPPL has undertaken extensive Social Surroundings consultation with KNAC Representatives, including two multi-day consultations consisting of meetings at Newman House and on-Country visits. These on-Country visits included stops at discussion locations across the Proposal area which included the location of proposed infrastructure, mining areas and areas of interest for KNAC Representatives (Preston Consulting, 2025, 2026).

5.3.1.1 Social Surroundings Trips

This section consolidates the concerns raised by KNAC Representatives during the Social Surroundings consultations undertaken in June and November 2025, together with HPPL responses and commitments. It reflects an iterative consultation process, where issues raised during the initial on-Country discussions were revisited, refined and, in many cases, progressed through design changes, additional studies, or specific management commitments during the second consultation. The matters summarised below capture KNAC Representatives' views regarding potential impacts to Country, culture, access, water, heritage, and long-term closure outcomes, and document how HPPL has sought to address these concerns through ongoing engagement, information sharing, and proposed avoidance, mitigation and management measures as the Proposal advances toward environmental approvals.

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5.3.1.1.1 Water (Groundwater and Surface Water)

KNAC Representatives consistently raised concerns about the sustainability of groundwater abstraction, cumulative impacts on water systems, and potential changes to the quality, quantity and flow of water across Country. Water was discussed holistically, without distinction between surface and groundwater, and representatives expressed a strong preference for no impacts to water systems, particularly downstream cultural features such as Eagle Rock Falls and Coondiner Creek.

In response, HPPL undertook groundwater pump testing across three bores and presented results during Trip 2, demonstrating that the aquifers are high yielding, capable of supplying project demand, and expected to experience only minor drawdown with recovery after mining ceases (Appendix 3.4). HPPL committed to ongoing monitoring of groundwater levels and quality, sharing summaries with KNAC, and ensuring abstraction remains within sustainable limits. HPPL also committed to developing and refining water management principles focused on reducing, reusing and recycling water, investigating dust suppression methods that limit water use, and undertaking a cumulative impact assessment for water (Appendix 3.4). Surface water modelling was revised between Trip 1 and Trip 2 to address errors and improve through-flow, with HPPL committing to further optimisation, transparent sharing of results, and inclusion of cumulative impacts in future assessments.

5.3.1.1.2 Cultural Heritage Protection

KNAC Representatives expressed strong concern about the protection of heritage sites, repeatedly emphasising that outcomes such as those experienced at the Juukan Gorge must not occur. Particular concern was raised regarding road works through a large artefact scatter, blasting near heritage sites, dust impacts, and unauthorised access. Representatives also raised the need for Nyiyaparli monitoring and clear on-ground controls.

HPPL responded by confirming that avoidance remains the primary management principle and that heritage discussions will continue through formal heritage forums and the development of a Cultural Heritage Management Plan. HPPL committed to site identification surveys, re-surveying of the large artefact scatter in consultation with KNAC, lodgement of Heritage Information Submission Forms where required, and implementation of Regulation 10 approvals under the *Aboriginal Heritage Act 1972* only where impacts are unavoidable. For road works, HPPL committed to sealing roads to reduce dust, physically stepped out road widths on Country, and agreed to engage KNAC monitors during construction if works proceed near heritage sites. HPPL also committed to implementing speed limits, no-stopping zones, signage, and access restrictions around heritage sites.

5.3.1.1.3 Dust Impacts

Dust was raised as a persistent concern across both consultation trips, particularly regarding impacts on TEK protection areas, culturally significant plants (including Karlkula (Bush Banana, *Leichhardtia australis*) and Karnti marnarnu (Bush Caper, *Capparis lasiantha*)), heritage sites, and overall ecosystem health. KNAC Representatives observed existing dust impacts during site visits and requested stronger, less water-reliant dust controls.

In response, HPPL committed to implementing site-wide dust management measures including reduced vehicle speeds, road sealing near sensitive areas, regular watering where required, and

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investigation of alternative dust suppression methods that reduce water use. Specific commitments were made to develop controls for TEK Ethnobotanical Management Areas (EMA; Figure 5-1), outline dust protection measures for Karlkula (Bush Banana, *Leichhardtia australis*), and integrate dust considerations into design and management planning. HPPL also acknowledged the need to balance dust suppression with water conservation.

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743300N

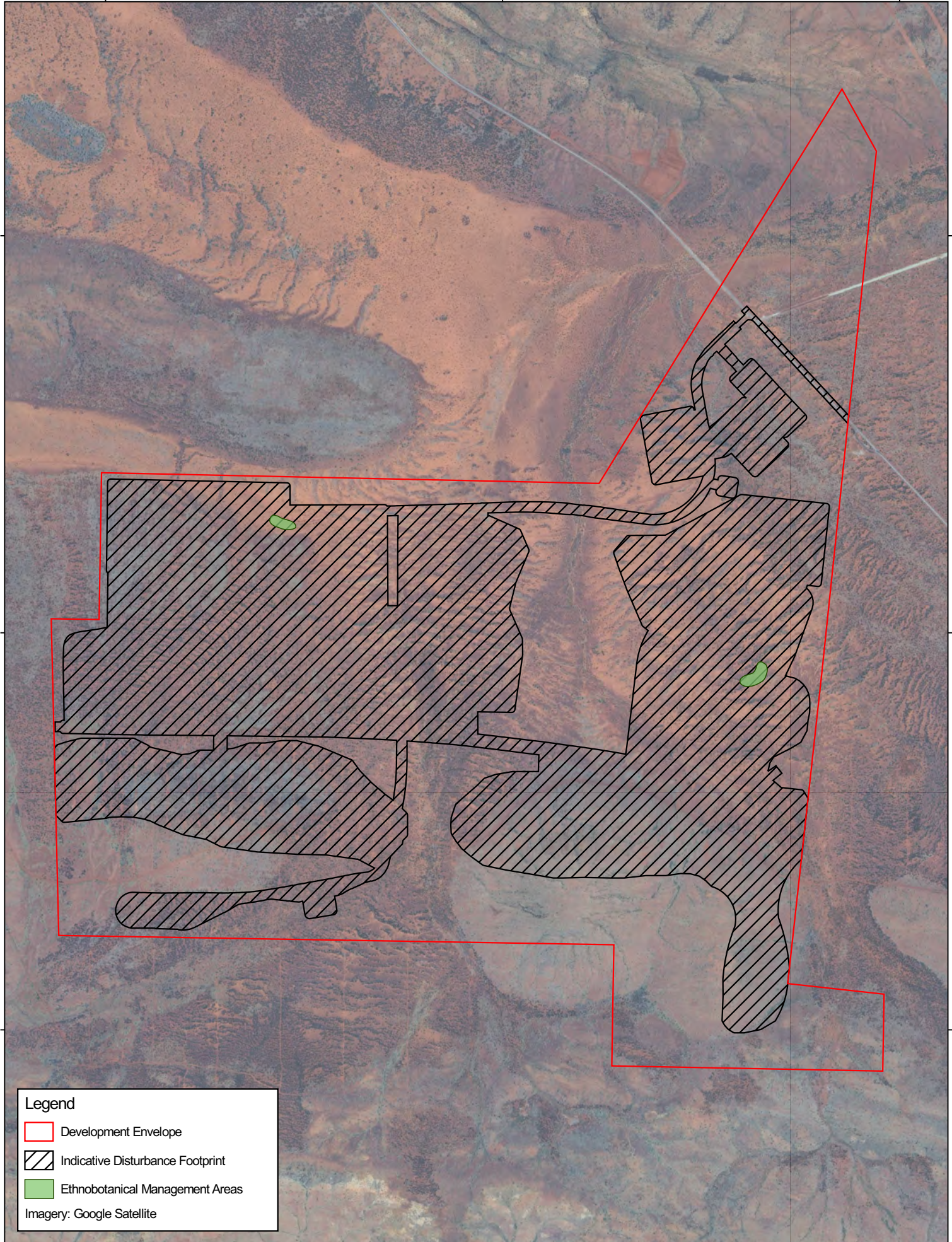
743300N

743050N

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Legend

- Development Envelope
- Indicative Disturbance Footprint
- Ethnobotanical Management Areas

Imagery: Google Satellite

0 0.5 1 km

GDA2020 / MGA zone 50

1:30,000



Project: 0612_ROU_036
 Date: 30/04/2026
 Size: A4
 Author: ASmithers

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Figure 5 1: EMAs within the Proposal

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5.3.1.1.4 Visual Impacts and Landscape Change

KNAC Representatives expressed concern about the visual and cultural impacts of pits and WRLs, and concern that WRLs would permanently block views and alter Country. Representatives requested a clearer understanding of how the landscape would look before mining, during operations, and at closure, including at night.

HPPL responded by presenting preliminary 3D WRL modelling during Trip 2 and committed to expanding visual impact information. This includes providing visual impact assessment (VIA) images from agreed vantage points, showing pre-development conditions, peak operations, closure outcomes, and night-time scenarios. HPPL also committed to aerial imagery and videography prior to ground disturbance and to continuing visual documentation through operations and closure.

5.3.1.1.5 Mine Closure, Backfilling and Rehabilitation

A major concern across both trips was the lack of clarity around mine closure outcomes, particularly the absence of committed pit backfilling and the long-term legacy left for Niyiyaparli people. KNAC Representatives expressed discomfort with large open voids and WRLs remaining post-closure and requested alignment with their closure principles.

HPPL acknowledged these concerns and confirmed that while current mine planning does not guarantee full backfilling, options for progressive and partial backfilling are being considered to reduce WRL size and visual impact. HPPL committed to providing further information on backfilling options, estimated void depths after backfilling, WRL rehabilitation outcomes, and to sharing draft closure planning documentation with KNAC for review. Closure and access outcomes remain a key area for continued engagement.

5.3.1.1.6 Access to Country and Native Title Rights

KNAC Representatives raised concerns that infrastructure, pits and haul roads would restrict access to Country and disrupt hunting, gathering and caring for Country. In Trip 2, specific concern was raised that access to Prairie Downs Road would be cut off during operations, increasing travel distances.

HPPL committed to clarifying alternate access routes, quantifying additional travel distances, and reinstating access to Prairie Downs Road through the Proposal at closure, including ongoing road maintenance post-closure where feasible. HPPL also committed to developing access protocols with KNAC, considering signage and safety measures, and assessing opportunities to restore public access in a controlled manner after mining. Good hunting country near the highway will be managed to ensure maintained access and rehabilitation will be focused on retaining this habitat.

5.3.1.1.7 Camp Location, Infrastructure and Drainage

KNAC Representatives raised issues with the proposed camp location, including impacts to mature trees, culturally important drainage lines, noise, visibility from roads, and increased human movement. Representatives requested relocation to an area requiring less clearing and shared infrastructure where possible.

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In response, HPPL relocated the camp between Trip 1 and Trip 2 and committed to further refinement, including avoiding drainage lines where possible, preserving mature trees, installing culverts to maintain surface flows, and considering alternative layouts such as swapping camp and topsoil stockpile locations. HPPL also committed to providing night-time VIA imaging of the camp to assess visibility and impacts.

5.3.1.1.8 Flora, Fauna and TEK Protection Areas

KNAC Representatives emphasised protection of TEK areas, bush foods, medicine plants, fauna habitat, and mature trees. Strong concern was raised about dust deposition on Karlkula (Bush Banana, *Leichhardtia australis*) and Karnti marnarnu (Bush Caper, *Capparis lasiantha*) and potential clearing of these plants.

HPPL committed to using TEK EMAs to guide clearing decisions and is committed to avoiding direct impacts to these species within the EMA. During construction and operations, safe access within the controlled site will be facilitated for KNAC, including the TEK EMAs. HPPL will identify the two EMAs within its Ground Disturbance Permit processes, ensuring that no direct impacts to the trees of significance result from the implementation of the proposal.

Where impacts are unavoidable (outside of TEK EMAs), HPPL committed to facilitating seed collection, potential plant relocation, weed management planning, and progressive rehabilitation using local native species. HPPL also agreed to prepare and share a Weed Management Plan and restrict unauthorised access to sensitive areas.

HPPL will ensure that the trees of significance within EMAs are protected from indirect impacts such as altered hydrological regimes, dust deposition and weed infestation. Monitoring of the EMAs will be incorporated into the proposal's future site-wide monitoring program.

5.3.1.1.9 Transparency, Participation and Ongoing Engagement

Across both consultations, KNAC Representatives stressed the importance of early involvement, information sharing, and continued participation in monitoring and decision-making.

HPPL committed to providing KNAC with copies of key environmental documents (including this ERD), plain-English summaries of technical studies, opportunities for KNAC monitors during heritage and water-related works, cultural awareness training for staff and contractors, and ongoing engagement as the Proposal progresses through approvals.

5.3.2 Existing Environment

5.3.2.1 Current Land Use

The Proposal is located in the Pilbara region of WA. The Pilbara region is known for its ancient landscapes, rich onshore and offshore resource deposits and one of the world's largest collections of Aboriginal engraved rock art. With a geographic area of over 500,000 km², the Pilbara consists of four Local Government Areas and has key regional centres in Karratha and Port Hedland.

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The resident population of the Pilbara in 2014-15 was estimated at almost 66,000 people, with Aboriginal people comprising about 16%. The region has more than 31 language groups comprising people who have a strong spiritual, physical, and cultural connection to Country.

The Pilbara is important to the economic development of Australia due to its internationally significant deposits of minerals and the processing of liquefied natural gas. Pilbara iron ore sales in 2015-16 totalled over \$46.6 billion, representing 96% of the State's iron ore sales and 53% of the State's mining and petroleum sales value (DBCA, 2023). Mining provides employment for 18,500 people in the Pilbara and mining tenements cover 70% of the region.

Almost 60% of the Pilbara is pastoral land and is primarily focused on commercial cattle grazing. The Pilbara pastoral industry was valued at \$83.5 million in 2013-14 (DBCA, 2023). The conservation reserve system covers 6% of the region, whereas a target of 17% of land in conservation reserve is considered necessary to protect biodiversity (Convention on Biological Diversity, 2010). Pilbara conservation reserves include Karijini National Park, Murujuga National Park, Millstream Chichester National Park, Mungaroo Nature Reserve, the Dampier Archipelago island reserves, and Cane River Conservation Park. These reserves help support a growing tourism industry that attracted more than 820,000 visitors to the Pilbara in 2015, with tourism contributing more than \$578 million to the regional economy. Karijini and Millstream Chichester National Parks are among the best known parks in Australia and are flagship tourism destinations.

Unallocated Crown land comprises 28% of the Pilbara, 16% of which is former pastoral lease that has been purchased or acquired as exclusions under the 2015 pastoral lease renewal program, for inclusion in the conservation reserve system. Three per cent of the region is held in Aboriginal reserves.

5.3.2.2 Local Residents and Community

Sensitive receptors within 15 km of the Proposal include two mining related areas and two naturally occurring tourist attractions (Table 5-2). These receptors were chosen by investigating aerial imagery and known areas of interest.

The area surrounding the Proposal is sparsely populated, with the closest town of substantial population being Newman, approximately 30 km southeast of the Proposal.

Table 5-2 Potential sensitive receptors within 20 km of the Proposal

Name	Significance	Approximate distance to DE (km)
Hope Downs 4 Village	Mine site accommodation	4.5
Ophthalmia Range	Tourist attraction/Aboriginal Cultural Heritage Value	5.7
Hope Downs 4 Mine Site	Mine site	8.0
Mount Newman	Tourist attraction	10.2
Stewarts Pool	Tourist attraction	14.3
Eagle Rock Pool	Tourist attraction/Aboriginal Cultural Heritage Value	15.3

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Name	Significance	Approximate distance to DE (km)
Eagle Rock Falls	Tourist attraction/Aboriginal Cultural Heritage Value	16.3

The Shire of East Pilbara identified the following Local Planning Scheme zones within a 20 km buffer of the Proposal (Department of Planning, Lands and Heritage (DPLH), 2022):

- Rural; and
- Major Road.

No Regional Schemes, State Planning Policies, Structure Plans, or other underlying land descriptions were identified.

Therefore, it is considered that the areas surrounding the Proposal currently provide limited recreational / tourism value.

5.3.2.3 Native Title Holders / Traditional Owners

The Proposal lies entirely within the area of the Niyaparli native title determination (WCD 2018/008) (**Determination Area**) (Figure 1.1). Karlka Niyaparli Aboriginal Corporation (KNAC) is the registered native title body corporate which holds native title rights and interests in trust for the Niyaparli People.

The Determination Area includes the town of Newman, the Aboriginal community of Jigalong, pastoral leases, and major mining sites. Several areas of cultural and environmental significance lie within the Determination Area, including the Fortescue Marsh, Weeli Wollie Creek, Coondiner Pool, Caramulla Creek, Ethel Gorge and Savory Creek.

KNAC's *Niyaparli People & Country Plan Fortescue Marsh 2023-32 (People & Country Plan)* describes the Niyaparli connection to country:

"The Niyaparli people have lived on Ngurra (Country) since its creation, when the earth was soft and ancestral beings shaped the landscape. During this shaping period, the ancestral beings embedded songlines and dreaming across Country and within the law. These sacred stories and songs are the oral repository of Niyaparli knowledge, values, and beliefs. They provide Niyaparli with an intricate knowledge of the land and its seasons, animals, and plants" (Karlka Niyaparli, 2022, p7).

The People & Country Plan explains the Niyaparli belief that all things in the world have kalharra (kinship and connection), including plants, animals and the environment. Accessing country and maintaining healthy country is therefore fundamentally important to the Niyaparli People (Karlka Niyaparli, 2022).

The People & Country Plan also describes what Niyaparli People have observed and experienced to be threats to healthy country, including industry activities, feral animals and weeds, climate change, alternate fire regimes, loss of habitat, impacts to water sources, constraints to implementing cultural

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land management practices, loss of important sites and cultural knowledge over time (Karlka Nyiyaparli, 2022).

5.3.2.4 Heritage and Cultural Values

Aboriginal Heritage values within the DE have been identified through desktop assessments, on-country ethnographic and archaeological heritage surveys and ongoing consultation with Nyiyaparli People.

Aboriginal cultural values were identified through field surveys with KNAC Representatives, anthropologists, archaeologists, ethnobotanists, botanists, ecologists, and zoologists.

A desktop assessment comprised a review of government databases and literature, some of which was provided by KNAC. Species identified from the desktop assessment were cross referenced with the list provided by KNAC to get a suite of species likely to occur in the Proposal pre-survey. This list was utilised by the Biologic consultants to select the target areas and as a field guide for potential species with TEK values observed during the survey. Opportunistic sampling, driven by KNAC representatives, also formed an integral part of collected TEK data and values.

5.3.2.4.1 Heritage Values

The DPLH publicly available spatial data layer includes areas defined by Nyiyaparli People. This layer plots an 'Artefact / Scatter' heritage site (Bakers South AS1408) within the Project Area (Figure 1.1) (DPLH, 2021). There are also other places of importance within the Project Area and immediate surrounds, including (but not limited to) Aboriginal Cultural Heritage (ACH) places that are listed on the Western Australian Government's Aboriginal Cultural Heritage Inquiry System, listed on DPLH's Aboriginal Heritage Places layer, or not formally listed anywhere.

A variety of Heritage sites have been identified within the broader tenement and within the Proposal area comprising a mixture of artefact scatters and culturally modified trees. A 25 m buffer has been placed on heritage sites at a minimum to avoid direct impacts. HPPL will continue to work with KNAC Representatives to develop a Cultural Heritage Management Plan.

The precise location of the heritage sites identified by KNAC representatives are considered sensitive and as such are not available for publication, however the locations have been shared with HPPL and used to avoid and minimise impacts to Aboriginal Cultural Heritage.

5.3.2.4.2 Cultural Values

Thirty-one (31) plant species of cultural value were recorded/discussed during the TEK survey. The majority of species are generally common and widespread across the Proposal. Seven species were considered as culturally significant two of these, are uncommon throughout the Proposal:

- Common:
 - Kartanypa – *Hakea lorea/ chordphylla*
 - Parlkarri/ Parlkarringu – *Corymbia hamersleyana*;
 - Parlpinyapa – *Acacia ancistrocarpa*;
 - Paru/ patinyu – *Triodia pungens*; and

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- Vicks Bush - *Stemodia grossa*.
- Uncommon:
 - Karlkula - *Leichhardtia australis*; and
 - Karnti marnarnu - *Capparis lasiantha*.

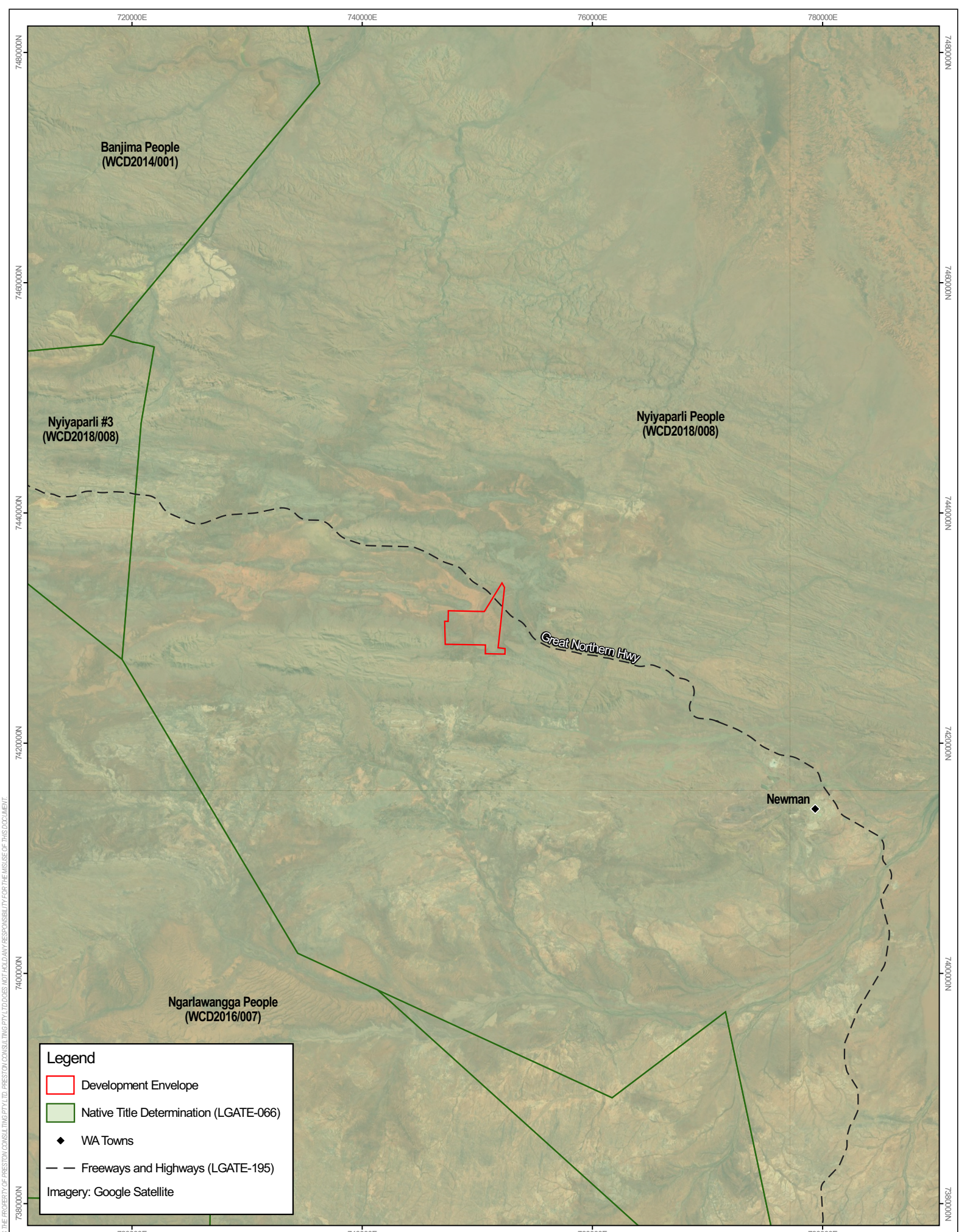
Twelve (12) animal species of cultural value were recorded/discussed during the TEK survey; three mammals, five birds, one reptile and three invertebrates. Most of these were associated with food (eight species) and two have important medicinal uses.

The fauna species identified by the KNAC Representatives as being culturally significant were:

- Jarnkurta/ kalaya/ karlaya – emu (*Dromaius novaehollandiae*);
- Marningarra/ pakarla/ partura – bush turkey/ Australian bustard (*Ardeotis australis*);
- Maruntu/ wantiji – sand goanna (*Varanus gouldii*);
- Milypu/ namirla/ nyamila/ parti – grub/ bardi grub (*Endoxyla leucomochla*);
- Munganya – short-beaked echidna (*Tachyglossus aculeatus*);
- Pajiwitarra/ parkarranykurra/ walana/ warringkura/ warrinpa – plains/ red kangaroo (*Osphranter rufus*); and
- Pikurta – hills kangaroo/ euro (*Osphranter robustus*).

The vegetation type of highest concern to KNAC Representatives were the ‘dense Mulga hardpan plains (mulga banding/groving)’. These areas provided critical habitat for culturally significant plant species. Mapping and protection of this vegetation type isn’t necessarily required, or was requested by KNAC representatives, as it is very widespread in the Survey Area and surrounds, but should be considered for ongoing management. The fauna habitats are suitable for all the culturally significant species, with evidence of kangaroos seen in most of the mulga groves and drainage areas.

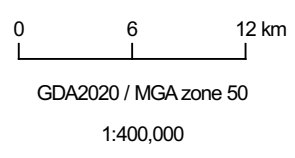
KNAC Representatives also expressed concern for the drainage line that runs through and alongside the Proposal and noted that the drainage line and surrounding trees carry importance.



Legend

- Development Envelope
- Native Title Determination (LGATE-066)
- ◆ WA Towns
- — Freeways and Highways (LGATE-195)

Imagery: Google Satellite



Project: 0612_ROU_009
 Date: 22/05/2026
 Size: A4
 Author: ASmithers



Figure 5-2: Nyiyaparli People Native Title Determination Area

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5.4 Proposed Mitigation

HPPL has mitigated the potential impacts to this factor according to the mitigation hierarchy; avoid, minimise, rehabilitate. Offsets are generally not applied to this factor.

5.4.1 Avoid

The Proposal sits relatively tight around the orebody, leaving relatively little room for WRL, internal roads, infrastructure pads, and services to be placed. However, a general arrangement was able to be developed that minimised disturbance of identified heritage sites, referred to as the 'minimal disturbance' footprint.

The 'minimal disturbance' footprint however was noted to restrict surface water flows due to the need to 'wrap' roads and infrastructure pads around heritage sites. With input from Nyiyaparli Traditional Owners during Social Surroundings workshops, there was a clear priority to minimise impacts to surface water flows from the Round Hill catchment. Additionally, impacts to drainage habitat has been avoided where possible to reduce impacts to culturally significant fauna (as listed in Section 5.3.2.4.2)

The Proposal layout presented in this ERD was developed to reduce impacts to surface water flows through the tenement, but it required the disturbance of additional heritage sites. This Proposal layout presented in this ERD was discussed with Nyiyaparli Traditional Owners during on-going Social Surroundings workshops in the second half of 2025.

The layout of the Proposal presented in this ERD considers impacts to both heritage sites and waterways, balancing impacts to both of these critical features in consultation with Nyiyaparli Traditional Owners. HPPL will avoid direct impacts to important species (TEK) within the EMAs.

5.4.2 Minimise

The following mitigation measures are proposed to ensure that direct and indirect impacts to social surroundings are minimised:

1. **Obtain and comply with Works Approval and Licence issued under Part V of the EP Act.**
 - a. A Works Approval and Licence will be required for the Proposal. The Works Approval and Licence is the primary mechanism for ensuring the design and operation of the Proposal is conducted in a manner that minimises impacts to social surroundings, primarily by minimising dust and noise emissions.
2. **Round Hill Project Agreement.**
 - a. Aboriginal Heritage will be managed in accordance with the Round Hill Project Agreement; and
 - b. HPPL will work with KNAC to develop a Cultural Heritage Management Plan.
3. **Implement industry best-practice management measures for Aboriginal Heritage:**
 - a. Undertake Aboriginal Heritage surveys across any areas proposed to be disturbed or proximal to;
 - b. Vegetation clearing will be managed through internal ground disturbance procedures;

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- c. Boundaries of areas to be cleared or disturbed will be identified by GPS coordinates and maps of boundaries will be provided to dozer operators;
 - d. Progressive clearing will be undertaken; and
 - e. The DE will be developed to the minimum required to ensure safe and adequate construction and operation.
4. **Implement surface water management procedures (Appendix 3.4);**
 5. **Implement industry best practice management measures for flora and vegetation, including culturally significant flora (as listed in Section 3.4.2);**
 6. **Implement industry best practice management measures for terrestrial fauna, including culturally significant fauna (as listed in Section 4.4.2);**
 7. **Limit clearing of 'Drainage' habitat to a maximum of 5 ha; and**
 8. **Where impacts are unavoidable, HPPL will facilitate seed collection, potential plant relocation, weed management planning, and progressive rehabilitation using local native species.**

5.4.3 Rehabilitate

A MCP will be prepared prior to closure in accordance with DMPE Guidelines (2025b) and the Approvals Statement issued to the Proposal under the *Mining Act 1978*. The MCP will describe the rehabilitation and closure of the Proposal, and associated management and monitoring proposed during the closure phase including:

- Materials balance for closure and rehabilitation demonstrating the quantities, availability, and management for all rehabilitation materials;
- Identified knowledge gaps to be filled prior to closure;
- Closure tasks; and
- Completion criteria, monitoring, and reporting during closure.

The key rehabilitation measures from the MCP that relate to social surroundings are summarised as:

1. All mine infrastructure will be removed;
2. The mine will be progressively recontoured; and
3. The mining area will be revegetated with local native species, including species of cultural value; and
4. All infrastructure (including land access barriers other than the mine pit abandonment bund) will be removed.

The MCP will be submitted to DMPE for assessment and approval as per the requirements of the Approvals Statement that will be issued to the Proposal under the *Mining Act 1978*.

5.5 Potential Environmental Impacts

5.5.1 Identified Environmental Impacts

The implementation of the Proposal will result in direct and indirect impacts to Aboriginal cultural heritage and traditional uses of the land.

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There are no potential impacts to recreational, tourism or other sensitive receptors that require management.

5.5.2 Predicted Environmental Impacts

Table 5-3 defines the predicted impacts (direct, indirect, and cumulative) on the social values for this factor in a local and regional context.

Table 5-3 Predicted impacts on social surroundings

Social value and current extent	Potential direct impact	Potential indirect impact	Impacts associated with other proposals	Total cumulative impact
Traditional and cultural uses of the land Aboriginal Cultural Heritage values identified within the DE as an outcome of heritage surveys.	Direct impacts proposed to heritage sites as a result of ground disturbance. Clearing of 989 ha of vegetation within Nyiyaparli Country that may contain TEK species and areas used for cultural or traditional purposes.	Amenity impacts associated with noise and dust emissions. Restriction of access to Country. Potential indirect impacts to heritage sites.	The nearest significant Proposal, the Pilbara Energy Project Expansion, is located 0.4 km Northeast. Operations on Nyiyaparli Country comprise Projects proposed by (but not limited to): <ul style="list-style-type: none"> • APA Group; • BHP; • FMG; • Rio Tinto; • HPPL; • Mineral Resources; and • Roy Hill. 	Disturbance of sites as a result of the Proposal and additional impacts associated with Projects within the Nyiyaparli native title determination area. Disturbance of native vegetation that may be used by Nyiyaparli People.

5.6 Assessment of Significance of Residual Impacts

5.6.1 Proposal

The Proposal has been designed to minimise impacts on both Aboriginal Cultural Heritage and other cultural and traditional values, specifically local creek lines. Social Surroundings consultation has been undertaken during two on-Country trips and a TEK survey. Key topics raised included:

- Creek line and surface water impacts;
- Groundwater abstraction impacts;
- Potential restrictions to the access of the land;
- Impacts to Ophthalmia range;
- Impacts to known Aboriginal Cultural heritage sites (direct and indirect);
- Camp design (return of animals to Country);
- Closure and rehabilitation; and
- Cumulative impacts of mining within the Determination Area.

HPPL has implemented the 'minimal disturbance' footprint to reduce the extent of impacts to Country.

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The development of a CHMP for the Proposal with KNAC and KNAC Representatives will outline an agreed management approach for Cultural Heritage and will be modified and updated as required.

The Proposal will result in the following unavoidable impacts to Social Surroundings:

- Impacts to heritage sites that are the subject of ongoing site identification level recording;
- Temporary and permanent (post-closure) disturbance of Country; and
- Restriction of access for traditional uses during the life of the Proposal.

HPPL continue to consult with KNAC and the Nyiyaparli People through the processes within the Round Hill Project Agreement with the aim of managing impacts to Aboriginal Cultural Heritage and traditional values.

5.6.2 Cumulative Impacts

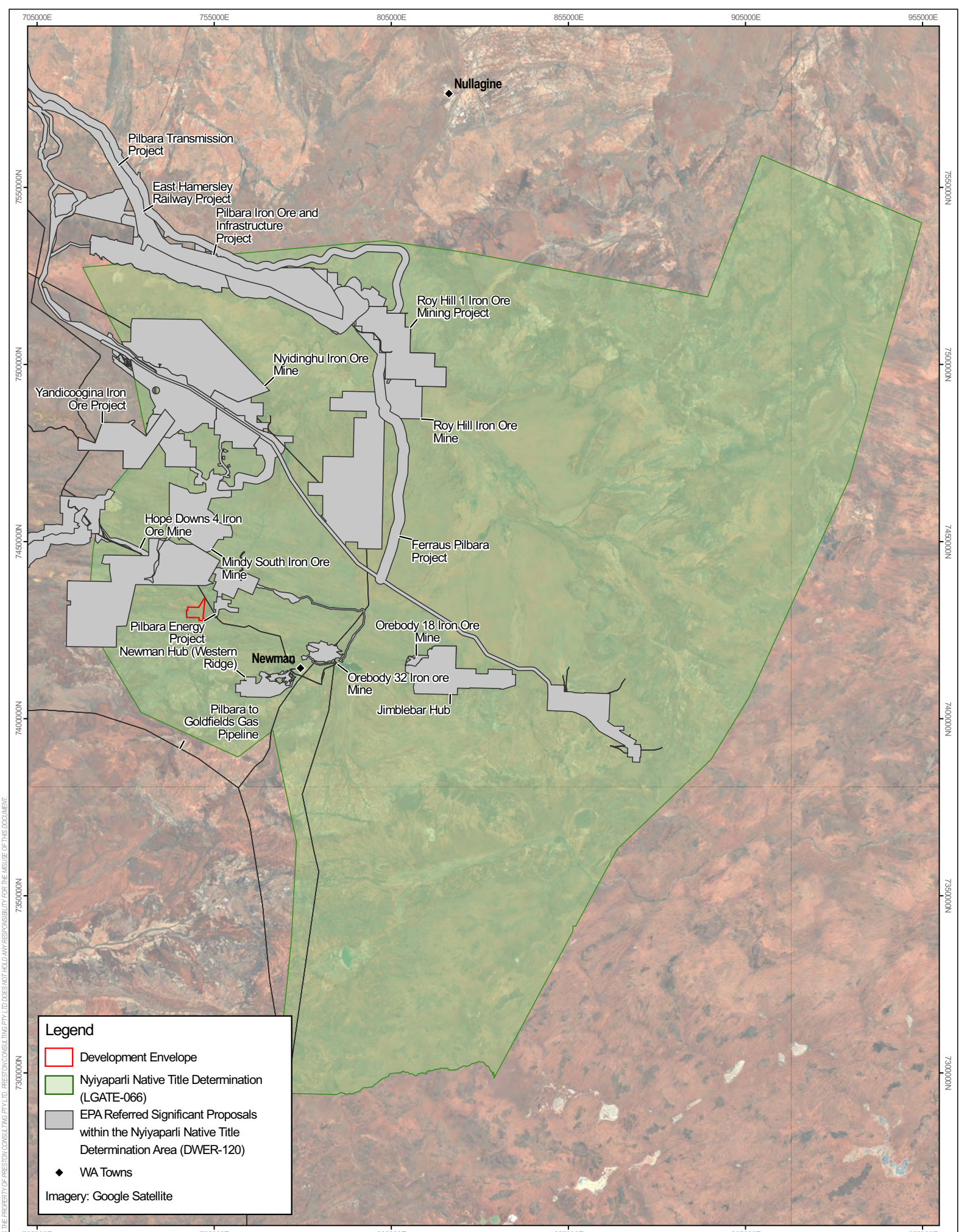
The Proposal is to be developed on Nyiyaparli Country, which already contains a large number of existing and planned mining projects. A total of 41 EPA significant Projects have been proposed or are currently operating within the Determination Area under Part IV of the EP Act.

Figure 5-3 shows the DE's of EPA Significant Proposals located within the Determination Area. There is limited public information on disturbance to heritage values associated with other Proposals, however, it is acknowledged that the implementation of some of these projects will result in the loss of heritage values in addition the sites proposed to be disturbed for the Proposal.

Figure 5-3 illustrates the significant extent of mining within the Determination Area. While this Proposal is relatively small in the context of other mining operations within the Determination Area, it will incrementally add to the scale of cumulative impacts. Cumulative impacts were a key discussion point during Social Surroundings consultation, and the design of the Proposal was revised to minimise both local and regional impacts (such as downstream impacts on creek line flows).

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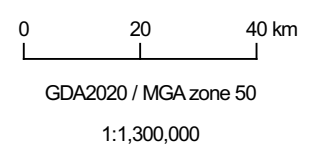
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Legend

- Development Envelope
- Nyiyaparli Native Title Determination (LGATE-066)
- EPA Referred Significant Proposals within the Nyiyaparli Native Title Determination Area (DWER-120)
- WA Towns

Imagery: Google Satellite



Project: 0612_ROU_025
 Date: 18/12/2025
 Size: A4
 Author: ASmithers



Figure 5-3: EPA Significant Proposals within the Nyiyaparli Native Title Determination Area

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5.7 Environmental Outcomes

The EPA’s environmental objective for this factor is to “protect social surroundings from significant harm” (EPA, 2023a).

The Proposal has incorporated extensive avoidance, minimisation and rehabilitation measures into the Proposal design and operational processes to ensure that social surroundings impacts are minimised.

The Proposal is expected to result in negligible impacts to local residents, tourism and community given the lack of observed recreational or other use of the land. Impacts associated with dust and noise will be managed by a works approval under Part V of the EP Act and no sensitive receptors are in close proximity to the Proposal.

There are no listed European Heritage values which occur within the DE and therefore there are no predicted impacts to European Heritage and values.

HPPL has conducted extensive Aboriginal Heritage ethnographic and archaeological surveys across the DE. HPPL will endeavour to avoid any sites identified during these surveys. HPPL will obtain and comply with approvals under the AH Act for any Aboriginal Heritage sites that are to be disturbed.

HPPL will ensure ongoing consultations with KNAC throughout the life of the Proposal. This includes:

- Matters pertaining to Heritage sites and places in line with the Round Hill Project Agreement;
- Management of TEKs and EMAs;
- Development of a Cultural Heritage Management Plan;
- Development of the Mine Development and Closure Proposal (MDCP), especially regarding backfill and waste rock landform design and integration of species of cultural value in rehabilitation plans;
- Detailed layout and design, including road/access options and accommodation location.

The predicted outcomes for Social Surroundings are therefore:

- Disturbance to Aboriginal Heritage Places limited to the sites identified by Nyiyaparli People during surveys (inclusive of the lodged site); and
- No restrictions on Traditional Owner’s access to Country, unless for safety reasons.

Based on the above, HPPL considers that the Proposal can be implemented such that there are no significant residual impacts to this factor, and the EPA objective can be met.

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6 Offsets

Environmental offsets are actions that provide environmental benefits which counterbalance the significant residual impacts of a proposal. Offsets may be utilised where it is accepted that the residual impacts of a proposal remain significant, after avoidance, minimisation and rehabilitation have been pursued. Consistent with the WA Environmental Offsets Guidelines (Government of WA, 2014), offsets can be proposed where they are able to counterbalance, and are related to, the Proposal's residual impacts.

Offsets are the last of the four steps in the mitigation hierarchy (Avoid, Minimise, Rehabilitate and Offset). They are only applied to counterbalance residual significant impacts when the other steps have already been applied to a Proposal.

HPPL has commissioned numerous environmental surveys and studies for the Proposal. The surveys determined that there were key environmental values that required protection including terrestrial fauna habitat. Changes to the Proposal design have been made to avoid and minimise significant impacts to the relevant Environmental Factors during Proposal construction and operations.

6.1 Summary of Significant Residual Impacts

The WA Environmental Offsets Guidelines (Government of WA, 2014) states:

“In general, significant residual impacts include those that affect rare and endangered plants and animals (such as declared rare flora and threatened species that are protected by statute), areas within the formal conservation reserve system, important environmental systems and species that are protected under international agreements (such as Ramsar listed wetlands) and areas that are already defined as being critically impacted in a cumulative context. Impacts may also be significant if, for example, they could cause plants or animals to become rare or endangered, or they affect vegetation which provides important ecological functions”.

The assessments conducted in Sections 3 and 4 have utilised the findings of the numerous surveys and studies completed for the Proposal. HPPL has assessed the residual impacts of the Proposal against the residual impact significance model provided in the WA Environmental Offsets Guidelines (Government of WA, 2014).

The proposed residual impacts are based on the current indicative DE, which is conservative and will continue to be refined as necessary during the planning phase of the Proposal.

Proposed offsets are not limited to Part IV assessment and can be a requirement of Part V approvals (NVCP conditions and management) if a 'not assessed' decision is proposed.

As described in the preceding sections of this ERD, the Proposal's predicted residual impacts on the environmental values are summarised in Table 6-1.

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Table 6-1 Summary of residual impacts – Part IV EP Act Environmental Values

Environmental value	Other associated values	Residual Impacts
'Good' to 'Excellent' condition native vegetation	Ghost Bat, Grey Falcon, Northern Quoll, Pilbara Olive Python	Clearing of up to 989 ha of good to excellent condition native vegetation / fauna habitat, including: <ul style="list-style-type: none"> • 532.2 ha of potential supporting habitat for the Ghost Bat; • 694.5 ha of potential supporting habitat for the Grey Falcon; • 5 ha of potential supporting dispersal habitat for the Northern Quoll; and • 5 ha of supporting habitat for the Pilbara Olive Python.

HPPL has assessed the residual impacts of the Proposal against the residual impact significance model provided in the WA Environmental Offsets Guidelines (EPA, 2014a). The findings of this assessment are provided in Table 6-2.

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Table 6-2 Assessment against residual impact significance model

Part IV Environmental Factors	Vegetation and Flora						
				Terrestrial Fauna			
Part V Clearing Principles	C: Rare flora	D: TECs	E: Remnant vegetation	F: Wetlands and waterways	H: Conservation areas	A: High biological diversity	B: Habitat for fauna
Residual impact that is environmentally unacceptable and cannot be offset	No residual impacts are considered to meet this criterion						
Significant residual impacts that will require an offset – all significant residual impacts to species and ecosystems are protected by statute or where the cumulative impact is already at a critical level	No Threatened Flora records are located within the DE.	No residual impacts are considered to meet this criterion - no TEC's or PEC's recorded within the DE.	Residual impacts to vegetation in 'good' to 'excellent' condition are likely to meet this criterion: Up to 989 ha of good to excellent condition native vegetation, including potential habitat for significant flora and fauna.	No residual impacts are considered to meet this criterion as no wetlands or waterways that are protected by statute lie within the DE.	No residual impacts are considered to meet this criterion as no conservation areas that are protected by statute occur within the DE.	No residual impacts are considered to meet this criterion as no areas of high biological diversity were identified within the DE.	Some significant residual impacts associated with terrestrial fauna habitat including: Up to 5 ha of disturbance to potential supporting habitat for Pilbara Olive Python; 532.2 ha of disturbance to potential supporting habitat for the Ghost Bat; 5 ha of disturbance to potential supporting dispersal habitat for the Northern Quoll; and 694.5 ha of disturbance to potential supporting habitat for the Grey Falcon.
Significant residual impacts that may	Some significant residual impacts	No other residual impacts are	Potential indirect impacts	No residual impacts are	No residual impacts are	No residual impacts are	Potential indirect impacts to terrestrial

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<p>require an offset – any significant residual impacts to potentially threatened species and ecosystems, areas of high environmental value or where the cumulative impact may reach critical levels if not managed</p>	<p>associated with priority flora (to be determined once detailed assessment of desktop data has been undertaken.</p>	<p>considered to meet this criterion – refer above.</p>	<p>to good to excellent quality vegetation may occur, although the extent of impact is likely to be minimal and not require offsets.</p>	<p>considered to meet this criterion: refer above.</p>	<p>considered to meet this criterion: refer above.</p>	<p>considered to meet this criterion: refer above.</p>	<p>fauna may occur, although the extent of impact is likely to be minimal and not require offsets.</p>
<p>Residual impacts that are not significant</p>	<p>No known Threatened Flora listed under the EPBC Act or BC Act will be disturbed. Priority flora species were recorded within the development envelopes. Based on the assessments of these species in Section 11.5, the Proposal is unlikely to significantly impact the local or regional extent of these species.</p>	<p>No other residual impacts are considered to meet this criterion – refer above.</p>	<p>Clearing of vegetation that is in poor or degraded condition will occur as a result of the Proposal however this is not considered to be a significant residual impact.</p>	<p>No other residual impacts are considered to meet this criterion – refer above.</p>	<p>No other residual impacts are considered to meet this criterion – refer above.</p>	<p>No other residual impacts are considered to meet this criterion – refer above.</p>	<p>Clearing of fauna habitat that is in poor or degraded condition will occur as a result of the Proposal however this is not considered to be a significant residual impact.</p>

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6.2 Details of Proposed Offsets

Table 6-3 describes the potential measures proposed to offset the residual impacts associated with the Proposal.

If this Proposal is not assessed under Part IV of the EP Act, offsets will be conditioned within a NVCP and if necessary, an Offset strategy/plan will be drafted for the Proposal. Both outcomes will result in compliance within the requirements of the WA Environmental Offsets Guideline (EPA, 2014a).

Table 6-3 Proposed offsets

Offset	Type	Details	Relevant value
Contribution to the PEOF ('base rate') for direct impacts to 'Good' to 'Excellent' condition native vegetation / fauna habitat. This vegetation includes broad foraging or dispersal habitat for Pilbara Olive Python, Northern Quoll, Ghost Bat and Grey Falcon.	PEOF: Direct—preservation of existing habitat and management	The PEOF provides conservation programs designed to offset key species and habitats typically impacted in the Pilbara bioregion.	Pilbara Olive Python Northern Quoll Ghost Bat Grey Falcon Good to Excellent quality native vegetation

6.3 Assessment of Offsets

HPPL has completed a WA Offsets Template as per the requirements of the WA Environmental Offsets Guideline (EPA, 2014a), provided in Table 6-4.

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Table 6-4 WA offsets policy template

Existing Environment/Impact	Mitigation			Significant Residual Impact	Offset Calculation Methodology				
	Avoid and Minimise	Rehabilitation Type	Likely Rehab Success		Type	Risk	Likely Offset Success	Time Lag	Offset Quantification
<p>Good to Excellent Condition native vegetation / fauna habitat – clearing of up to 989 ha of good to excellent condition native vegetation, including potential habitat for significant flora and fauna species.</p> <p>Pilbara Olive Python– clearing of up to 5 ha of supporting habitat.</p> <p>Ghost Bat – clearing of up to 532.2 ha of potential supporting habitat.</p> <p>Grey Falcon – 694.5 ha of potential supporting habitat.</p> <p>Northern Quoll – 5 ha of potential supporting dispersal habitat.</p>	<p>Avoid: The majority of Drainage vegetation has been avoided.</p> <p>Minimise: Minimise clearing within good to excellent vegetation</p> <p>Industry standard clearing controls</p> <p>Compliance with Part IV EP Act approval, Part V EP Act Works Approval and Licence, and Mining Act.</p> <p>Limits on Drainage and Rocky Hill habitat</p>	<p>Decommission and remove infrastructure; All infrastructure will be removed from site;</p> <p>All long-term disturbance areas will be respread with topsoil (or ripped and seeded if topsoil is no longer viable) and rehabilitated;</p> <p>All earthmoving equipment will be cleaned free of any soil material to minimise the risk of weed introduction;</p> <p>Where practicable, depressions attributable to mining operations will be contoured to be free draining or provide for fauna egress in the event of temporary pooling events.</p>	<p>Can the environmental values be rehabilitated/ Evidence?</p> <p>Likely, Pilbara rehabilitation methods are well established, particularly for mining operations.</p> <p>Operator experience in undertaking rehabilitation?</p> <p>HPPL will utilise experienced rehabilitation personnel at closure.</p> <p>What is the type of vegetation being rehabilitated?</p> <p>Various</p> <p>Time lag?</p> <p>Up to several decades for vegetation to fully re-establish.</p> <p>Credibility of the rehabilitation proposed (evidence of demonstrated success)</p> <p>Credible, Pilbara rehabilitation methods are well established and while success has been varied, additional scientific information is likely to be available at closure.</p>	Yes	Contribution to the PEOF at the 'Hamersley – base' rate for direct impacts to Good to Excellent quality vegetation / habitat	Low – PEOF well-established for offsets in the Pilbara	<p>Can the values be defined and measured?</p> <p>Yes – value to ecosystem can be measured</p> <p>Operator experience/Evidence?</p> <p>PEOF managers will manage the offset</p> <p>What is the type of vegetation being revegetated?</p> <p>N/A</p> <p>Is there evidence the environmental values can be re-created (evidence of demonstrated success)?</p> <p>N/A</p>	Minimal—manages vegetation and affected species soon after payment.	Offset would protect/improve/maintain the quality of significant areas of these environmental values.

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6.4 Offset Principles

Six principles support the assessment and decision-making process undertaken by the WA Government in relation to the use of environmental offsets. These principles are set out in the Environmental Offsets Policy (EPA, 2011). The Proposal and proposed offsets have been assessed against each of these principles, as provided in Table 6-5.

Table 6-5 Assessment of the proposed offsets against the six principles

Number	Principle	Consideration
1	Environmental offsets will only be considered after avoidance and mitigation options have been pursued.	HPPL has applied the mitigation hierarchy by identifying measures to avoid, minimise and rehabilitate. The primary action taken to meet this policy's requirements was site selection and design, which avoided and minimised impacts to key environmental features, and reduced the required disturbance to the smallest size possible.
2	Environmental offsets are not appropriate for all projects.	It is acknowledged that offsets are not appropriate for all projects. Numerous mine designs were assessed to ensure the impacts are at a scale of significance where offsets are appropriate. As the Proposal may result in significant residual impacts to fauna habitat and vegetation, an offset is considered to be appropriate.
3	Environmental offsets will be cost-effective, as well as relevant and proportionate to the significance of the environmental value being impacted.	HPPL will contribute funding into the PEOF for residual impacts to terrestrial fauna habitats and good to excellent condition vegetation. The PEOF has been developed to be cost-effective for potential significant residual impacts in the Pilbara and is relevant and proportionate to the Proposal's potential significant residual impacts.
4	Environmental offsets will be based on sound environmental information and knowledge.	PEOF is managed and implemented by DWER with advice from the fund's advisory group. It is expected that PEOF meets this principle. The proposed management and conservation programs will be designed to ensure the offsets are based on sound environmental information and knowledge.
5	Environmental offsets will be applied within a framework of adaptive management.	PEOF is adaptively managed to adjust its delivery over time as more information and opportunities become available. The proposed management and conservation programs will be developed to include a review and revision component to ensure it utilises the most up-to-date information and research measures.
6	Environmental offsets will be focused on longer term strategic outcomes.	PEOF investment will target areas with a high density of both state and Commonwealth environmental values, and where land tenure enables legal access and longevity for offset outcomes. The proposed management and conservation programs will be designed to be focused on longer term strategic outcomes.

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7 Glossary

Term	Definition
AH Act	<i>Aboriginal Heritage Act 1972</i>
ALA	Atlas of Living Australia
AWT	Above water table
BAM Act	<i>Biosecurity and Agriculture Management Act 2007</i>
BC Act	<i>Biodiversity Conservation Act 2016</i>
BoM	Bureau of Meteorology
DAWE	Department of Agriculture, Water and the Environment
DBCA	Department of Biodiversity, Conservation and Attractions
DBLH	Drill, Blast, Load & Haul method
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DE	Development Envelope
DF	Disturbance Footprint
DMPE	Department of Mines, Petroleum and Exploration
DotEE	Department of the Environment and Energy
DPIRD	Department of Primary Industries and Regional Development
DPLH	Department of Planning, Lands and Heritage
DSEWPaC	Department of Sustainability, Environment, Water, Population and Communities
DSO	Direct Shipped Ore
DWER	Department of Water and Environmental Regulation
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EMA	Ethnobotanical Management Area
EN	Endangered
EP Act	<i>Environment Protection Act 1986</i>
EPA	Environmental Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
ERD	Environmental Review Document
GHG	Greenhouse gas emissions
GLpa	Gigalitres per annum
GWP	Global warming potential
HPPL	Hancock Prospecting Pty Ltd
IBRA	Interim Biogeographic Regionalisation for Australia
IBSA	Index of Biodiversity Surveys for Assessments
KNAC	Karlka Nyiyaparli Aboriginal Corporation
MCP	Mine Closure Plan
MDCP	Mining Development and Closure Proposals
MI	Migratory

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Term	Definition
Mining Act	<i>Mining Act 1978</i>
MNES	Matters of National Environmental Significance
Mtpa	Million tonnes per annum
NGERS	National Greenhouse and Energy Reporting Scheme
Pumajina	Parnpajinya Aboriginal Reserve and community
PEC	Priority ecological community
PER	EPBC Act Public Environment Report
Proposal	Round Hill Project
RIWI Act	<i>Rights in Water and Irrigation Act 1914</i>
ROM	Run of Mine
SRE	Short-range endemic
t CO ₂ -e	Tonnes of carbon dioxide equivalent
TEC	Threatened ecological community
VU	Vulnerable
WA	Western Australia
WoNs	Weeds of National Significance
WRL	Waste Rock Landforms

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