

Ref: APP-0012904

3 November 2025

Dr. David Abdo
Manager
Department of Water and Environmental Regulation
71 McCombe Road, Bunbury WA 6230

Dear Dr. David Abdo

Re: Mulga Downs Iron Ore Mine - Low Impact Activity Areas

On 24 September 2025, in a meeting between the Mulga Downs Iron Ore Mine (the Proposal) EPA-Services assessing officers and the HanRoy environmental approvals team, the assessing officers requested additional information relating to restricted activity areas within the Development Envelope. An initial response was provided to the EPA-Services on 14 October. Further review has occurred, the outcome of which is provided below.

HPPL internal review of restricted activity areas

On Monday August 11, 2025, HanRoy hosted members of the EPA and EPA Services at the Mulga Downs Iron Ore Project. During the site visit, respective subject matter experts gave an overview of key elements of the Proposal. A key environmental mitigation presented to the EPA/EPA-Services was the implementation of the Fauna Habitat Exclusion Zone (FHEZ) and the FHEZ Corridor. The FHEZ accounts for 1,320.82 ha that has been excised from the Development Envelope where no disturbance as a result of implementation of this Proposal will occur. Adjoining the FHEZ is the FHEZ Corridor, which accounts for 991.45 ha of the Development Envelope. The purpose of the FHEZ Corridor is to ensure connection of the high value habitat within the FHEZ to habitat outside of the Development Envelope.

Following the presentation of the Proposal, Mr. Darren Walsh (EPA Chair) suggested that HanRoy consider the implementation of additional restricted activity areas. Mr. Walsh suggested the northern portion of the Development Envelope would be ideal as it is adjacent to the currently proposed avoidance areas and did not contain mining and/or infrastructure in the mine general arrangement depicted during the site visit.

HPPL reviewed the concept of Low Impact Activity Areas (LIAAs) internally following recommendations from Mr. Walsh during the site visit. The LIAAs were discussed with a working definition considered as “an area intended to accommodate supporting infrastructure—such as water management systems, telecommunications, power reticulation, minor access and environmental/heritage monitoring—while avoiding key mining activities such as proposed or potential ore extraction, processing, and haulage”.

Discussion focussed around two key, large areas that currently have no mine related high impact activities shown as occurring. These areas identified as Area 1 and Area 2 are shown on Figure 1. The general arrangement of the mine shown in this figure is indicative, with continued design revision ongoing as a response to criteria change (such as requests from BNTAC and its representative bodies and the local community) and increased engineering maturity.

Various constraints were identified posing flaws to restricting activities within areas 1 and 2. Area 1 has been identified as containing mineralised ore deposits and is a contingency location for non-process infrastructure. Area 2 represents an overlap with the Mulga Downs Hub and Rail Spur Proposal (Assessment No: 2358). This is a standalone proposal that is currently under assessment with the EPA. Should the Hub and Rail Spur Proposal be implemented, the designation of area 2 as a LIAA under the Mulga Downs Iron Ore Mine proposal would conflict with proposed activities under the Hub and Spur proposal such as the Rail and Stockyard.

One additional area was then assessed for classification as a LIAA; Area 3 shown on Figure 2.

Area 3 is approximately 143ha and is located immediately adjacent to the Fauna Habitat Exclusion Zone (FHEZ) and the FHEZ Corridor. Allocating area 3 as a LIAA will increase the proposed boundary of the FHEZ and FHEZ Corridor from 985m to 1,600m.

Area 3 includes approximately 105ha of Rocky Hills habitat and 3.7ha Drainage line/ floodplain habitat. Also included within Area 3 is MEC075, a category 4, transitory Pilbara leaf-nosed bat cave and as such, is viewed as a valuable and additional avoidance commitment for the project.

Careful consideration has been taken in determining this proposed addition to the FHEZ Corridor and it is noted that the indicative general arrangement footprint for the mine proposal will intersect area 3 as it includes low impact infrastructure such as a communications tower, communications access track and powerline corridor to the communications tower. In addition, Area 3 will also include a portion of conveyor connecting the Mine project with the Hub and Spur proposal when Hub and Spur proposal is constructed.

It is acknowledged that any conveyor corridor within the FHEZ Corridor would likely be subject to a future update, submission and approval of a revised Conservation Significant Fauna Management Plan to ensure the values of the FHEZ and FHEZ Corridor are not compromised by any additional infrastructure.

In summary, HPPL has actively explored the potential for LIAAs within the Development Envelope in response to EPA recommendations. Subject to any future BNTAC and or project requirements, and an agreed definition of LIAA, the inclusion of area 3 into the FHEZ Corridor is proposed.

By way of separate correspondence, we will provide further detail on the most recent and forthcoming consultation with Banjima, BNTAC and their advisors.

For any further information or queries in relation to this matter, please contact me at brett.mcguire@hanroy.com.au.

Kind regards

Brett McGuire

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Manager Environment and Approvals

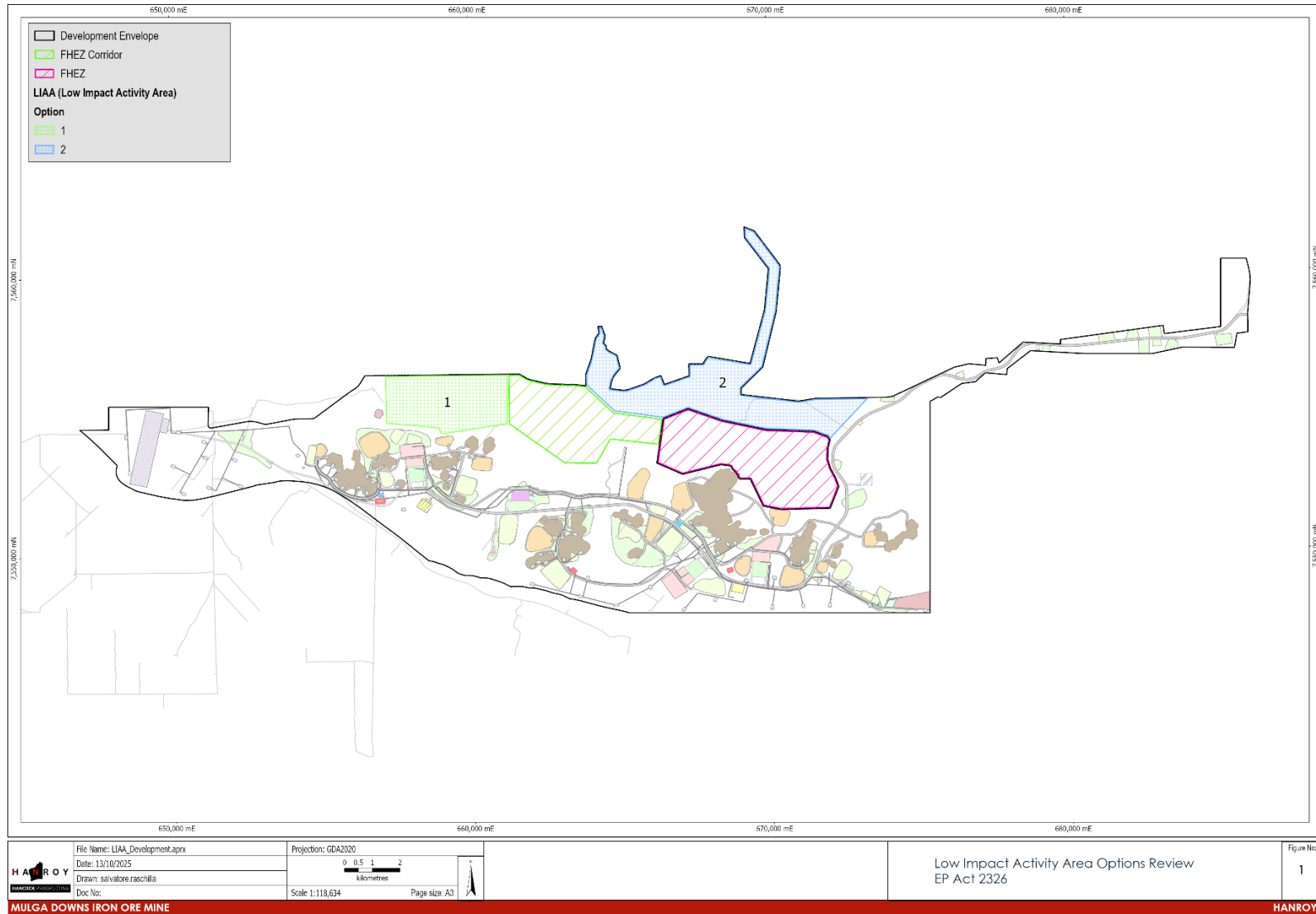


Figure 1: Low Impact Activity Area Options Review

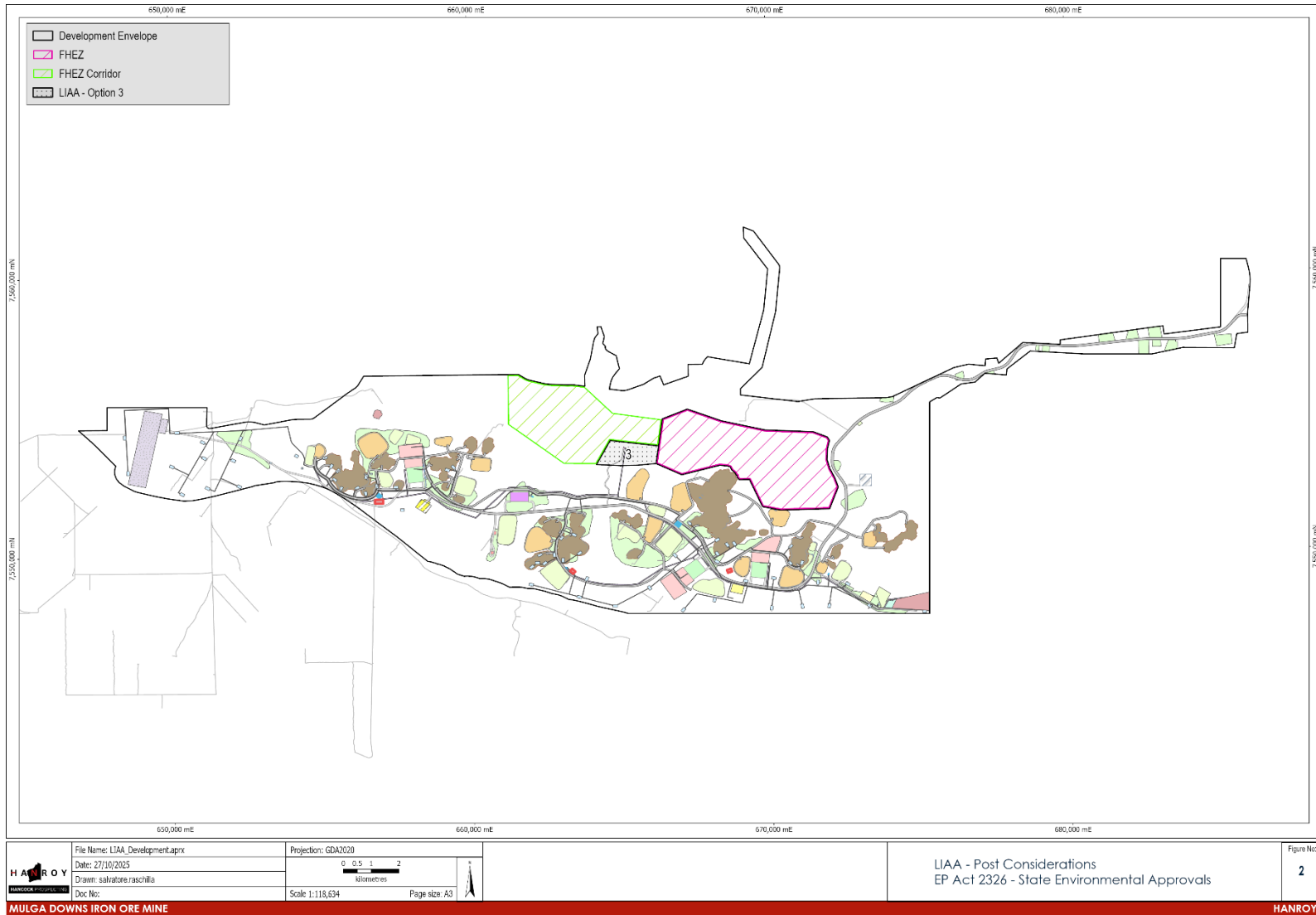


Figure 2 Low Impact Area Option - Area 3