TELFER – HAVIERON PROPOSAL
RESPONSE TO SUBMISSIONS

As part of EPA Referral under Section 38 of the *Environmental Protection Act 1986* a public review period of 3 weeks was prescribed for the Telfer – Havieron Proposal. This commenced on 30 October 2024 and closed on 4 December 2024.

Public submissions were received in addition to further requests for information from the EPA Services (EPAS) and consulted WA Departments. A summary of submissions was provided by the EPAS on 12 February 2025. EPAS requested a response under s.40(6)(b). Greatland's response comprises the following:

- Responses to comments from EPA Services (EPAS) provided in Table 1 of this document
- Responses to public comments provided in Table 2 of this document
- Changes to the Referral Supporting Document (RSD) advertised revision is provided in Table 3 of this document.

The updated package submitted comprises:

- Referral Supporting Document Rev 9, December 2025
- Appendix A – Stakeholder Consultation Register
- Appendix B – Letter of support to EPA
- Appendix C - Detailed Flora and Vegetation Survey - Havieron Mine Area, Stratagen, 2020
- Appendix D - Reconnaisance Flora and Vegetation Survey - Stratagen, 2020
- Appendix E - Detailed Flora and Vegetation Survey - Infrastructure Corridor, Stratagen, 2021
- Appendix F - Flora Desktop Assessment, 2022
- Appendix G - Weed Assessment 2022
- Appendix H - Goodenia hartiana targeted survey August 2024
- Appendix I - Goodenia hartiana targeted surveys map series
- Appendix J - Significant Species Management Plan v2
- Appendix K - Historical flora and veg surveys for Approved Proposal
- Appendix L - Detailed Vertebrate and SRE Survey, Biologic, 2020
- Appendix M - Detailed Vertebrate and SRE Invertebrate Fauna Survey, Infrastructure Corridor, Biologic 2021
- Appendix N - Telfer Conservation Significant Species Assessment, Spectrum 2021
- Appendix O - Telfer Night Parrot Monitoring, Spectrum, 2022
- Appendix P - Havieron Project Bilby monitoring, Biologic, 2021
- Appendix Q - Havieron Project Greater Bilby Monitoring, Biologic, 2022
- Appendix R - Telfer Significant Fauna Monitoring Report, Spectrum, 2023
- Appendix S - Scope 1 Greenhouse Gas Emissions Assessment
- Appendix T - Scope 3 Greenhouse Gas Assessment
- Appendix U - Social Studies
- Appendix V - Biologic Subterranean Fauna Survey 2020
- Appendix W - Biologic Stygofauna Survey and Risk 2022
- Appendix X - Surface Water Assessments
- Appendix Y - Hydrological Report
- Appendix Z - Soil Characterisation Report
- Appendix zAA - Stage 1 Waste Rock Characterisation Report, 2021
- Appendix zBB - Stage2 Waste Rock Characterisation, 2021
- Appendix zCC - Havieron Tailings Characterisation Study, 2021
- Appendix zDD - Mine Closure Plan Rev 4
- Appendix zEE - Offset Management Plan v3
- Appendix zFF - Lake Waurkarlicarly Night Parrot Desktop Review 2022

- Appendix zGG - Lake Waurkalicarly Targeted Night Parrot Survey 2023
- Appendix zHH – Havieron Night Parrot Habitat Review, Nick Leseberg (Adaptive NRM), 2025
- Appendix zII – Targeted Night Parrot habitat survey, Red Dog, 2025

A folder containing redacted appendices is also provided but is not for public display. The redactions relate to the location of Night Parrot confirmed recordings (confidential to align with conservation advice and Martu request) and the location of culturally sensitive information (also at the request of Martu). The Stakeholder Engagement Register also redacts names as is required for publication.

Table 1 – Response to EPA Services comments

EPA SERVICES COMMENT	PROPONENT RESPONSE
Flora and Vegetation	
Comment 1. EPA Services notes the information regarding direct and indirect impacts to priority flora species is limited. Table 11-1 (Residual impact significance model) provided in the revised referral supporting document indicates *Goodenia hartiana* (P2) and *G. nuda* (P4) are highly likely and other priority species may present but exist in dunes and ridgelines that will not be significantly impacted by the proposal. **Action** In the absence of targeted surveys for species that are listed as "likely to occur" in the Flora and Vegetation Reports (Appendix B), provide further discussion to support the statement that the species will not be significantly impacted by the proposal and how impacts will be mitigated if priority species are detected in the disturbance footprint. Cumulative impacts to flora from the existing Telfer mining area and the current proposal should be quantified in the ERD.	**Response to Comment 1 (refer RSD, Section 5):** RSD Section 5 has been significantly revised to provide further commentary on: ▪ Priority species relevant to the proposal and the reasons for that determination ▪ Review and reference to all relevant studies undertaken and inclusion of these as Appendices ▪ Further description and discussion of targeted survey for *Goodenia hartiana,* contextualisation with desktop and baseline surveys and assessment of cumulative impacts from proposed clearance. In summary ▪ Five priority flora species were identified in desktop survey as relevant to the proposed amendment. Of these, only *Goodenia hartiana* is considered significant for the following reasons*:* ○ *Goodenia nuda* (P4) was de-listed and no longer discussed https://www.dbca.wa.gov.au/management/threatened-species-and-communities ○ *Eremophilia tenella* (P1) and *Ptilotus wilsonii* (P1) are associated with rocky ridgelines that are not present within the Havieron Development Envelope (DE) ○ *Indigofera ammobia* (P3) were not recorded and considered unlikely to be present within the Havieron DE (Ecoscape, 2024) ▪ *Goodenia hartiana* (P2) 5-day targeted survey in August 2024 identified 6,610 individuals (1,592 within the proposed disturbance footprint), with an estimated local population (Telfer-Havieron) of 67,000 plants. The potential clearance of *Goodenia hartiana* represents less than 2.5% of the total population and is unlikely to threaten the species survival. Notwithstanding, *Goodenia hartiana* is associated with sand dunes and swales and therefore of high cultural significance to Martu. Disturbance is minimised through use of existing cleared roads, with pre-clearance survey and Martu monitors in place to minimise impacts.

EPA SERVICES COMMENT	PROPONENT RESPONSE
Comment 2. The referral supporting document v6 (RSD) indicates locations of *Goodenia hartiana* (P2) by referencing the *G. hartiana* survey (Syrinx 2008) which was not provided. Considering the historical *G. hartiana* location records and lack of current information, EPA services advises that additional information is required to understand how the impact of 21% to *G. hartiana* was estimated (see Table 4.3: Risk assessment for fauna related impacts provided in Appendix C) and whether it relates to direct, indirect or cumulative impact. **Action** Revise all relevant sections regarding Priority flora *G. hartiana* with current information and include the targeted survey report as appendices.	**Response to Comment 2 (refer RSD, Section 5):** RSD Section 5 has been substantially revised, including a full review and interpretation of *Goodenia hartiana* surveys, cumulative impacts assessment completed, and new maps generated. All referenced surveys are provided as appendices as follows: Appendix H – *Goodenia hartiana* targeted survey, August 2024 Appendix I – *Goodenia hartiana* map series For completeness historical Telfer surveys used in cumulative impact assessment have been combined as a single supporting reference in Appendix K.
Comment 3. EPA Services notes that the Significant Species Management Plan (Appendix C) is inconsistent with the RSD and does not provide sufficient detail on current management effectiveness to ensure environmental impacts can be managed appropriately. **Action** Revise the SSMP to align with contemporary scope and commitments of the proposal, such as clearing limits on threatened fauna habitat, which do not align with the proposal's footprint. Mitigation and management measures should include, but not be limited to: • predator control (pre, during and ongoing for the life of mine) • vehicle movement and clearing time restrictions (construction and operations) • speed restrictions, and • appropriate fire management near and in long unburnt areas	**Response to Comment 3 (refer SSMP v2, Appendix J):** The Significant Species Management Plan has been significantly revised (Version 2) as is provided in Appendix J. Key updates are: • Outcomes more clearly established with trigger and thresholds • Establishment of feral species baseline to ensure the effectiveness proposed abatement program can be measured and triggers and thresholds applied • Traffic controls have been specified, and a commitment to no nighttime haulage until the collection of further data on Night Parrot and Greater Bilby. • Focus on MNES species. It should be noted that the structure of the plan is as per the Commonwealth Department of Climate Change, Energy, Environment and Water (DCCEEW) Guidelines for Environmental Management Plans 2010 to ensure the SSMP can form a statutory plan for EPBC referral. This was discussed with EPAS who are satisfied with this so long as content the content is contemporary and meaningful.
Comment 4. EPA services notes that 17 introduced flora species have been recorded in the Telfer mining area (Appendix B) while none have been recorded in the Havieron proposal and infrastructure corridor area. EPA Services advises that to prevent the spread of introduced species, there is need to review and update current management.	**Response to Comment 4 (refer RSD, Section 5.5 and SSMPv2 Appendix J):** Mitigations for introduced species have been revised in RSD Section 5.5 and an outcome-base mitigation proposed as Outcome 4 of the SSMP, and includes: • annual weed survey, including remote sensing

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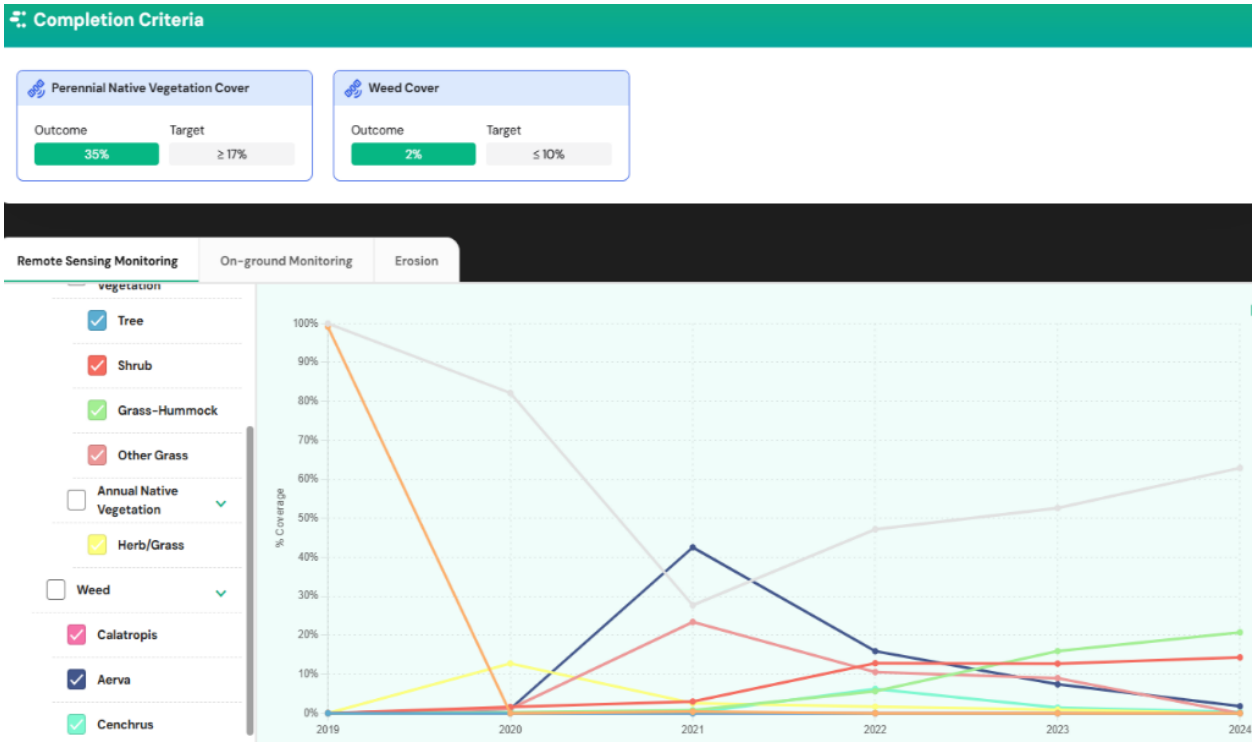
Action Revise introduced flora species mitigation and management to include active management and monitoring practices to reduce introduced species within the approved proposal area and prevent incursion and proliferation into the expanded proposal area.	• Standard hygiene processes including vehicle inspections (weed hygiene certificate required for outside region mobilisation of ground engaging equipment) • procedures to control vehicle and personnel movements within weed infested areas. • management of weed and native vegetation against rehabilitation criteria as outlined in the approved Mine Closure Plan. Similar criteria will be adopted for the Havieron Mine Closure Plan. Successful weed control measures in place at Telfer will be extended to Havieron. An example of due diligence applied to the ongoing management of weeds in rehabilitation areas is shown below, with successful management of Kapok (dark blue line) against criteria for weeds and native vegetation cover:



EPA SERVICES COMMENT	PROPONENT RESPONSE
Terrestrial fauna	
Comment 5. *Pezoporus occidentalis* (night parrot; ranked critically endangered) has been recorded in proximity of the development envelope and critical habitat may be significantly impacted by implementation of the proposal. Based on the information provided, the assessment of important habitat for threatened fauna is inconsistent with the current understanding of species ecology. The documentation classifies night parrots' "primary" habitat types as sand plains, sand dunes and saltpans for roosting, where suitable mature Triodia species occur. Saltpans were also considered "primary" foraging habitat, and sand plains and sand dunes "secondary" foraging habitat. The development envelope contains all three "primary" habitat types; however, the documentation classifies some areas as "secondary" habitat. Given the presence of night parrot in the development envelope, unburnt and long unburnt areas, the presence of Triodia species, and proximity to saltpans, these areas are likely to provide important habitat for night parrot. 6. Macrotis lagotis (greater bilby; ranked vulnerable) have been recorded in the development envelope and may be significantly impacted by implementation of the proposal. Further, greater bilbies are likely to inhabit sand plain and sand dune habitat types where suitable burrowing substrate is present. Unburnt areas of these habitats are considered in the documentation as "primary" breeding, foraging, and dispersal, while burnt areas have been categorised as "secondary" foraging and dispersal habitats. While fire history (time since last burnt and intensity) are likely to be factors influencing greater bilby presence, the effects of fire on greater bilby habitat within the development envelope are unlikely to be permanent. Bilbies use habitats of various fire ages for different food sources. Therefore, classifying burnt habitats as "secondary" habitats is an underestimate of their importance. The fauna surveys provided with the documentation indicate that greater bilby activity has been recorded in areas classified as "secondary" habitat, suggesting that these areas are important for the local population. As above for the night parrot please ensure the assessment of important habitat for threatened fauna is consistent with the current understanding of species ecology.	**Response to Comment 5 (refer RSD, Section 6.5.2 and new Appendices xHH and zII):** Whilst terminology used in the original baseline surveys (Biologic 2020 and 2021) was correct at that time the following changes occurred: • DBCA issued the *Guideline for considering the presence of Night Parrot, Version 1.0, March 2024* • Night Parrot was revised from Endangered to Critically Endangered and DCCEEW issued *Conservation Advice for Night Parrot (Pezoporus occidentalis), 5 September 2025*. In response the revised conservation advice and survey guidelines and to ensure the currency of habitat information, Greatland commissioned a specialist review and targeted survey for Night Parrot habitat as follows: • Havieron Night Parrot Habitat Review, Nick Leseberg, Adaptive NRM, September 2025 – Appendix zHH • Targeted survey for potential Night Parrot habitat along the Telfer to Havieron Development corridor, Red Dog, September 2025 – Appendix zII All previous classification of “primary” and “secondary” habitat has been removed and discussion throughout Section 6.5.2 utilises conservation advice that determines the habitat critical to the survival of Night Parrot includes the combined availability of: **Breeding and roosting habitat**: Low dense vegetation on flat and open terrain. This is most commonly long-unburnt old growth (>20 years old) Triodia patches, but may also be provided by thickets of lignum, dense shrubby samphire, and chenopods **Food resource habitat**: Run-on areas, floodplains, salt or clay pans, salt-lake margins, and other areas of relatively high vegetative or seed productivity such as those associated with paleodrainage systems **Flyways**: areas between feeding and breeding or roosting habitat through which night parrots traverse

EPA SERVICES COMMENT	PROPONENT RESPONSE
Additionally, to prevent ambiguity, EPAS requests that the language used in the assessment of threatened fauna habitats is consistent with contemporary EPA assessment terminology (i.e. “critical” and “supporting” habitat). **Action** Undertake an appropriate assessment of important habitat for threatened fauna to allow for accurate assessment of impacts and proposed offset strategy. Note Guidelines for determining the likely presence and habitat usage of night parrot (Pezoporus occidentalis) in Western Australia 2024 can be found Threatened and priority fauna resources | Department of Biodiversity, Conservation and Attractions.	**Water**: Permanent or ephemeral sources of free water, and potentially areas that support vegetation that offers a source of metabolic water for vertebrates; and **Gastrolith sources**: Ironstone plains, rocky breakaways, and other areas where stones of appropriate size and shape can be ingested to aid in food digestion. Specialist desktop review by Dr Nick Leseberg was commissioned by Greatland to understand the nature and potential for Night Parrot presence within and surrounding the Telfer-Havieron area (refer Appendix zHH). This concluded that the area may be utilised for flyways or foraging from time to time but does not provide the long-term stability required to support a persistent population of Night Parrot. On ground assessment was conducted in accordance with revised DBCA *Guideline for considering the presence of Night Parrot, Version 1.0, March 2024* (Red Dog, 2025, refer Appendix zII) using the following contained criteria: • Presence of *Triodia* and/or chenopods with structural complexity (DBCA, 2024a; Leseberg et al., 2022; Murphy, Silcock, et al., 2017) • Fire age of habitat greater than 20 years, with *Triodia* tending to form rings and provide suitable height (>40 cm) and thickness for Night Parrots (DBCA, 2024a; Jackett et al., 2017; Leseberg et al., 2022; Murphy, Silcock, et al., 2017) • Presence of flat-open terrain with few shrubs or trees (Leseberg et al., 2022) • *Triodia* occurring as a mosaic interspersed with fuel-free areas of bare stony ground which do not carry fire (Leseberg et al., 2022; Murphy, Austin, et al., 2017). This confirmed that there is little to no critical habitat within the development envelope comprising the haul road and Havieron Mine, and that the entire proposed 630 ha of clearance comprises flyways. Uncertainty remains regarding the utilisation of flyways and foraging in and around the Telfer-Havieron area. Greatland have proposed a two-year acoustic monitoring program that will be peer reviewed by Dr Nick Leseberg at the design phase (i.e. prior to deployment) and periodically throughout the monitoring period. **Response to Comment 6 (refer RSD Section 6.5.1):** In Biologic 2020, all fauna habitats mapped within the Study Area (5,153.64 ha) occur more broadly within the Regional Mapping Area (outside of the Development Envelope). Of the six fauna habitats mapped within the Regional Mapping Area, Sand Plain was the most widespread, covering approximately 62.7% (113,229.58 ha). This was followed by Stony

EPA SERVICES COMMENT	PROPONENT RESPONSE
	Plain (18.1%, 32,629.26 ha), Sand Dune (7.6%, 13,788.26 ha), Saltpan (5.6%, 10,061.09 ha), Stony Hill/Breakaway (4.7%, 8,4,9.34 ha) and Claypan (0.2%, 287.47 ha). The remaining 1.1% (2,014.83 ha) of the Regional Mapping Area comprised of cleared/disturbed areas, primarily associated with the Telfer Gold Mine. Of these identified fauna habitats, Biologic (2021) undertook a survey and recorded the following for Greater Bilby fauna habitat: • 99.44 ha (3.4%) of primary breeding, foraging and dispersal habitat, comprising areas of relatively mature and unburnt areas of Triodia hummock grassland and open Acacia shrubland • 2,560.58 ha (88.3%) of secondary foraging and dispersal habitat, comprising recently burnt areas or areas at various stages of post-fire regrowth, often dominated by Triodia grassland and Acacia shrubland of varying structure and density • 239.35 ha (8.3%) unsuitable (cleared/ disturbed) habitat. The “EPA RFI” (dated 30 July 2024, (Biologic 2024)) requested further information regarding habitat classification and Biologic responded to the RFI confirming the classification of habitats as below: • Primary: DoE (2013) classification of critical habitat - representing foraging, breeding, roosting and/or dispersal habitat critical for the species. • Secondary: can be “broadly considered as supporting habitat, as they provide habitat for the species but are unlikely to be relied upon for them or are only going to occasional utilise the areas for activities such as foraging and/or dispersal” (Biologic 2024). After reviewing the suggested Threatened and Priority Fauna resources, along with the SPRAT website (DCCEEW 2025b) and the listed conservation advice for this species (TSSC 2016b), it is evident that the fauna reports by Spectrum and Biologic accurately stated the habitat preferences for this species. When a new revision of the RSD is created, we will include a clear definition (within the definitions list and the main report) explaining the “primary” and “secondary” habitat classifications used within the fauna reports and reference habitat classifications "critical" and "supporting" as outlined in the BC Act. Greatland recognises the potential for new growth within the mapped fauna habitats and the possibility of increased habitat usage from supporting (secondary) to critical (primary) habitat in future. However, at the time of reporting, the classifications and conditions of fauna habitats were as stated in the reports. To prevent any harm to newly established critical (primary) habitat,

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	and conservation significant fauna in the area, Greatland Pty Ltd is committed to undertaking pre-clearing surveys before starting construction.
Comment 7. Given the results from night parrot monitoring (Spectrum 2022b) and significant fauna monitoring (Spectrum 2023) are not included in Table 6-3 (Terrestrial Fauna Surveys and related reports-Summary) of RSD, it is unclear whether the results of these surveys have been discussed or incorporated within the RSD and Significant Species Management Plan (SSMP). EPA Services notes that two different surveys for significant fauna species have been conducted within the proposal. It is unclear which data has been considered within the most recent surveys (Spectrum 2022a; 2023), and within the RSD and SSMP. EPA Services notes that the surveys are inconsistently referenced throughout the documents. For instance, a Spectrum (2021) survey has been cited throughout the RSD, however, the survey is not listed in Table 6-3 of the RSD. **Action** Review and revise relevant documents to provide consistent commentary including referencing on the night parrot surveys undertaken.	**Response to Comment 7 (refer RSD, Section 6 and renamed appendices as listed below):** Telfer-Havieron has conducted a number fauna surveys, as detailed in RSD Section 6-3, detailed in Table 6-2 for the Approved Proposal (Telfer) and Table 6-3 for the s.40AA Significant Amendment (Havieron). All fauna appendices and cross referencing have been clarified and checked. Mislabelling and errors have been corrected, and two reports omitted for unknown reasons were added (Spectrum (2022) - "*Telfer Operations Night Parrot Monitoring 2022*", and Spectrum (2023) - "*Telfer Operations significant fauna monitoring"*). Therefore, the fauna section has been reviewed, all appendices provided, and clear cross referencing made. Appendices are labelled as follows: Appendix L - Detailed Vertebrate and SRE Survey, Biologic 2020 Appendix M - Detailed Vertebrate and SRE Invertebrate Fauna Survey, Infrastructure Corridor, Biologic 2021 Appendix N - Telfer Conservation Significant Species Assessment, Spectrum 2021 Appendix O - Telfer Night Parrot Monitoring, Spectrum, 2022 Appendix P - Havieron Project Bilby monitoring, Biologic, 2021 Appendix Q - Havieron Project Greater Bilby Monitoring, Biologic, 2022 Appendix R - Telfer Significant Fauna Monitoring Report, Spectrum, 2023 New surveys were also conducted as a result of updated survey guidelines and conservation advice for Night Parrot (refer response to Comment 5) and are provided as: • Appendix zHH – Havieron Night Parrot Habitat Review, Nick Leseberg (Adaptive NRM), 2025 • Appendix zII – Targeted Night Parrot habitat survey, Red Dog, 2025

EPA SERVICES COMMENT	PROPONENT RESPONSE
Comment 8. The information about night parrot habitat suitability mapping is inconsistent throughout the documents. EPA Services recommends a night parrot report for the proposal to consolidate and justify night parrot survey effort across the proposal. • Night parrot habitat mapping (RSD, Figure 6-5) cites Biologic (2020; 2021) and Spectrum (2021). However, only Biologic (2021) undertook habitat mapping for night parrot. • Acoustic recorders have been deployed outside of mapped suitable night parrot habitat by both Biologic (2020) and Spectrum (2023). It is unclear if mapping of suitable night parrot habitat was consistent or agreed upon by Biologic and Spectrum as night parrot habitat mapping by Biologic (2022) does not appear to have guided the most recent night parrot surveys (Spectrum 2022b; Spectrum 2023). • Not all areas of suitable night parrot habitat have been surveyed. Given SM4 recorders (acoustic recorders) have approximately 200 m detection range, there is inadequate survey coverage within areas of mapped suitable night parrot habitat. Further surveys may be required to adequately cover all suitable nesting night parrot habitat identified by Biologic (2021). **Action** Review, consolidate and justify night parrot survey effort across the proposal. Noting the information within may be confidential due to poaching concerns and should be identified as such.	**Response to Comment 8 (refer RSD Section 6.5.2, with total Night Parrot survey effort in Table 6-9 and acoustic monitoring map in Figure 6-6):** **Response Part a:** Biologic 2020, and Biologic 2021 undertook broad fauna habitat mapping for all conservation significant species that included identifying the habitats preferred by Night Parrots. Additionally, Spectrum 2022b and Spectrum 2023 used desktop assessments to further expand and update the fauna habitat mapping from Biologic 2020. The broad fauna habitats, assessed and identified by the collective fauna reports, are utilised by the Night Parrot and therefore it seems appropriate to reference these within the RSD to determine the likelihood of Night Parrot occurrence. However, only Biologic 2020 (Appendix L), Biologic 2021 (Appendix M) and Spectrum 2022 (Appendix N) undertook targeted (ground-truthed) Night Parrot habitat mapping. The knowledge base has subsequently been revised by Red Dog (2025) based on new survey guidelines (refer response to Comment 5). **Response Part b:** The updated map for the acoustic recorder placements, for Night Parrot habitat and distribution across all surveys is provided in RSD Figure 6-6. The Acoustic survey summarised by Biologic (in Feb 2021), but initially written by Nigel Jackett, provides a detailed analysis of the Acoustic recordings undertaken between 2020 and 2021. Additionally, Spectrum 2022c, also contains a summary by Nigel Jackett about the survey effort and findings. Biologic was contacted and provided a documented response (2024) as follows: Biologic (2024) considered the survey effort for the Night Parrot adequate because it followed the DPaW (2017) *Interim Guideline for preliminary surveys of Night Parrot (Pezoporus occidentalis) in Western Australia*, which was the best available guidance at the time. DPaW (2017) acknowledged that at the time, there was no single survey method that could irrefutably demonstrate the species' absence. Habitat assessments and acoustic recording units were prioritized as the most effective, with the least number of limitations. Furthermore, no minimum sampling requirements for Night Parrot are stipulated by DPaW (2017). The sampling efforts from Biologic between 2020 and 2021 equates to a total of 415 recording nights across 50 locations, with sampling sites revisited following the completion of analysis of sampled sites to refine targeted sampling locations where necessary. The first confirmed detection (two calls) in 2020 indicated potential dispersal or resource-searching behaviour rather than nesting or roosting. Following this, additional acoustic

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	sampling was deployed in critical habitat areas after consultation with experts and stakeholders, ensuring a strategic approach. Despite refined efforts, only a faint single call was recorded post-2020 (confirmation of the identification not possible), further supporting the conclusion that individuals were likely transitory rather than established in the area. Subsequent targeted monitoring surveys (conducted between 2021–2023) by Spectrum did not detect the species again. Of note is that Spectrum (2023) utilised the broad fauna habitat mapping they conducted for all conservation significant species to identify potential Night Parrot habitat sites to place their acoustic recorders, rather than conducting targeted fauna habitat searches, which may be considered a limitation. Spectrum 2022c was missing from the RSD, which was a targeted survey for the Night parrot, conducted between 01 and 23 April 2022, and had a survey effort of 47 nights of acoustic recordings across 8 locations within two separate areas. This included a Call Analysis of 21,978 potential calls, which were manually assessed for Night Parrot vocalizations by Nigel Jackett (leading expert on Night Parrot ecology and call analysis). See RSD Table 6-9 for details.
Comment 9. Given the few locations where night parrot has been recorded, and potential roosting of individual/s in the development envelope, the area represents an important population of night parrot. Based on the nocturnal ecology of the species, the risk of nighttime clearing and vehicle strike on this population may be significant Greater bilby are nocturnal animals, highly mobile, with large foraging ranges, making them vulnerable to vehicle strike at night. There is evidence of greater bilby use of the area throughout the development envelope. The proposal includes the operation of a haul road 24 hours a day. Based on the documentation, a risk assessment on the potential impacts on night parrot and greater bilby from nighttime activities has not been undertaken and mitigation and management measures have not been proposed. **Action** Provide further information or undertake further investigations to clearly demonstrate that the potential risks and impacts on threatened fauna from operating the haul road and/or clearing at nighttime are negligible.	**Response to Comment 9 (refer RSD Section 6, Table 6-14, and SSMP Sections 7.3 and 7.4.5 (Appendix J):** Due to the paucity of vehicle strike data for the region no roadkill modelling or mapping could be completed. Specialist advice and an additional targeted survey have been completed for Night Parrot (refer response to Comment 5). There is little to no critical nesting or roosting habitat within the Havieron proposed clearance of 630 ha, with this being flyway and potential foraging only. Uncertainty about the landscape scale presence of Night Parrot and their actual utilisation of the development envelope has resulted in the proposed two-year acoustic monitoring program. Until this data is available to inform traffic risk assessment, Greatland have committed to no nighttime haulage. If, after assessment and approval Greatland are approved for nighttime haulage, traffic controls are outlined in the SSMP, Sections 7.3 and 7.4.5. Further assessment and mitigations for vehicle strike is provided in RSD Table 6-14. In addition to traffic controls, culverts and ecoducts will be installed along the 55km haul road. This combines with other traffic management controls to lower the risk. However, it is noted that uncertainty means a residual risk remains. This will be accounted for through the proposed offset.

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Comment 10. EPA services notes that bilby monitoring within the proposal to inform management is not adequately described. It is unclear whether all relevant data has been considered. **Action** Provide further information regarding the proposed bilby monitoring to inform management.	**Response to Comment 10 (refer RSD Section 6.5.1 and SSMP (Appendix J):** RSD Section 6.5.1 Greater Bilby section and SSMP have been revised to ensure clarity of objectives and ongoing monitoring.
Comment 11. It is unclear whether all suitable night parrot habitat has been adequately surveyed across the Telfer proposal. Although there are no proposed direct impacts to the primary (nesting) night parrot habitat there are still risks of indirect impacts from the proposal e.g. vehicle strike and lighting. Habitat fragmentation may also be an impact as it remains unclear whether nesting sites are present within the development envelope as not all suitable night parrot habitat may have been surveyed. Given figures within the RSD do not map significant fauna records in relation to the footprint, the impacts from proposal to significant fauna species remains unclear. **Action** Updated figures should be provided to inform assessment.	**Response to Comment 11 (refer RSD Section 6.5.2):** RSD Table 6-9 details all survey effort and monitoring locations shown in Figure 6-6. Discussion has been revised throughout Section 6.5.2.
Terrestrial environmental quality	
Comment 12. The description of current operations states “TSF7, a circular paddock-style TSF, is currently the only active TSF at the operations, receiving tailings slurry from the Telfer processing plant” and “Telfer has demonstrated full compliance as verified through assurance reporting framework.” However, there are two Prohibition Notices under the Mining Act 1978 (Mining Act) in place for TSF7 and an Environmental Protection Notice 202404 (EPN) under the Environmental Protection Act 1986 in place for TSF7 and TSF8. Therefore, it is unclear where tailings generated from the processing of Havieron Ore are to be deposited. TSF8 also recently had a Prohibition Notice under the Mining Act in place and the EPN as mentioned above. **Action**	**Response to Comment 12 (refer RSD Section 12.5):** Tailings deposition will only occur into TSF 7 and TSF 8 and this is outlined in RSD Section 12.5. TSF7 is currently prohibited from receiving tailings pending the completion of remediation works following a seepage issue (details discussed in response to Comment 14).

EPA SERVICES COMMENT	PROPONENT RESPONSE
Provide further information on TSF7 and TSF8 to accurately describe current and future uses including incidents leading to Prohibition Notices (Mining Act) and EPN/s (EP Act), key learnings and adaptive management implemented in order to ensure the EPAs environmental objectives can be met for terrestrial environmental quality.	
Comment 13. EPAS previously requested information on the properties of the Telfer/Havieron mine tailings which are proposed to be used as paste backfill for the Havieron underground be included in the ERD. The proponent response "tailings are already approved for mine backfill at Telfer based on characterisation and test work completed" does not adequately fulfill the EPAS request. **Action** Provide current information on tailings characterisation and test work undertaken. 14. Given tailings are to be deposited into TSF 8 at the Telfer mine site after processing of the Havieron ore, EPA Services expects to see a discussion on the recent events leading to compliance and enforcement notices being issued under both the Mining Act 1978 and the Environmental Protection Act 1986, and what has been actioned to prevent a reoccurrence.	**Response to Comment 13 (refer RSD Section 12.3.3 and 12.3.6):** RSD Section 12.3.3 has been updated with further information on tailings characterisation and testwork for Telfer tailings is presented in Table 12-2. Because tailings are co-deposited the origin of the tailings diverted for paste can either be from processing of Telfer or Havieron ore. Havieron tailings probable characteristics from testwork are discussed in Section 12.3.6. The Proposal is to recover Telfer tailings for transport to Havieron and use in the production of paste backfill for mine stability and safety. Tailings to paste is best practice environmental management and a key waste to resource initiative to preserve tailings facility capacity. The Proposal is for reclamation and use of tailings from the active TSF 7 and from suitable decommissioned TSF 1 – 6. The following outcomes-based management measures apply to the use of any tailings for paste: • Only tailings approved by a Mining Proposal can be reclaimed and used for paste backfill underground at Telfer or Havieron • Tailings transported for use at Telfer must be conditioned or covered to prevent fugitive dust • Tailings must be covered during transport to Havieron (conditioning is not sufficient due to the haul distance) • Storage of tailings prior to incorporation into paste will only be in bunded areas with dust suppression applied to prevent fugitive dust emissions • Addition of dry paste components (tailings and cement) must occur within a contained batch plant. **Response to Comment 14 (refer RSD Section 12.3.4):** In December 2023, and April 2024, there were two significant tailings storage facility events on TSF7 and TSF8 that resulted in Telfer ceasing ore processing for an extended period. The following regulatory instruments were issued: • TSF8 Prohibition Notice issued by DEMIRS 27/12/2023 to prohibit deposition of tailings. This was lifted 13/09/2024.

EPA SERVICES COMMENT	PROPONENT RESPONSE
	• TSF8 EPN issued by DWER 24/06/2024 to prohibit discharge of tailings or process water into TSF7 and TSF8 and directing that dam safety and environmental investigations are carried out to ensure risk of environmental harm is reduced and determine if pollution had occurred. This was lifted for TSF8 on 20/09/2024, and 14/03/2025 for TSF7 (to be lifted when the Prohibition Notice is lifted). • TSF7 Prohibition Notice issued by DEMIRS 18 April 2024 prohibiting the deposition of tailings slurry and any fluids. This Prohibition Notice continues in force Full details of the investigation, findings and corrective actions are provided in RSD Section 12.3.7. Greatland have worked closely with DEMIRS and DWER on a significant body of work to remediate TSF7 and TSF8 and assure that significant environmental impact has not been caused. RSD Section 12.3.4 outlines the event and response. The failure on TSF8 related to a water ingress through a compromised area of Outer Siltstone Member (OSM) materials liner that was not constructed in accordance with design as per the original Works Approval. The original design has been validated and the area remediated to that design. There is no preventive action available for this failure mode. The failure on TSF7 related to high water level on the dam that had been brought into service on a limited volume because of the TSF8 outage. That lead to 'wicking' of liquor into the central causeway allowing it to flow to the dam wall. As an emergency measure the operational status was not normal. The incident will not occur again given the application of standard operating criteria and surveillance protocols. Both incidents were identified quickly and responded to immediately, and measures to inspect TSFs are reviewed by the statutory 3rd party Engineer of Records.
Inland waters	
15. EPA Services notes the events leading to unauthorised discharges to the environment at Havieron in 2024 have not been discussed within the ERD. EPA Services expects to see a brief discussion describing the contributing factors, the learnings gained, and revised mitigation and management measures to demonstrate a similar event is unlikely to happen again.	**Response to Comment 15 (refer RSD Section 12.3.7):** Commentary regarding the DEMIRS notified hypersaline water discharge in March 2024 (ENV-PBB-189) has been provided in RSD Section 12.3.7. Mitigations have been updated to reflect preventive actions. It should be noted that the root cause of the discharge was ingress of catchment water into the evaporation pond system that is not designed as a catchment control. There is a constraint on evaporation pond capacity and Havieron has been in informal care and maintenance since November 2023 awaiting approval to construct additional ponds. The addition ponds are the ultimate solution to preventing future discharges.

EPA SERVICES COMMENT	PROPONENT RESPONSE
Greenhouse gas emissions	
16. Revise GHG emissions environmental impact assessment consistent with the EPA's Guideline – GHG Emissions (November 2024)	**Response to Comment 16 (refer RSD Section 7):** RSD Section 7 has been revised in accordance with the updated EPA Environmental Factor Guideline – GHG Emissions (November 2024).
Social surroundings	
Comment 17. Human health – Actinolite, a form of asbestos was identified in the Havieron ore. No explicit information is provided to support the claim that the proposed activities do not pose risk to public. It is likely that the ore will still contain actinolite after processing and may be released during various activities, including the export stage. **Action** To ensure the protection of the public EPAS recommends compliance with Guidance Note on Public Health Risk Management of Asbestiform Minerals Associated with Mining and implement a control system for fibrous materials that is consistent with the Management of fibrous materials in Western Australian mining operations guideline developed by DEMIRS.	**Response to Comment 17 (refer RSD Section 10.6):** Whilst PFM identified was below classification of Dangerous Goods and Hazardous Substances, it is noted that it represents an occupational health risk should the material be present in 'asbestiform'[1] at various stages of the process. Current PFM risk assessment and validation will inform final design and controls to prevent workplace exposures and uncontrolled release of fibres at all stages from mine to port. PFM is considered to be sufficiently managed by DEMIRS regulatory processes and clear obligations under the *WHS (Mines) Regulations 2022*, Parts 8.4, 8.5 and 8.9 given the absence of sensitive receptors.
Offsets	
Comment 18. EPA Services notes the information regarding offsets and the offset strategy is inadequate. **Action** Revise offsets and offset strategy consistent with the EPA's Public Advice Considering Environmental Offsets at a Regional Scale.	**Response to Comment 18 (refer RSD Section 13 and Appendix zEE):** The proposed biodiversity Offset has been fully revised in collaboration with JYAC. This is provided in updated RSD Section 13, and the Offset Management Plan provided as Appendix zEE. It should be noted that the offset utilises the EPBC calculator and aligns with DCCEEW guidelines because the species to be offset (Night Parrot and Greater Bilby) are MNES.
Other	
Comment 19. EPA Services notes rehabilitation success at Telfer has been included as a supporting factor in determining significant residual impacts. However,	**Response to Comment 19 (refer RSD Section 12.6.4):**

[1] Not all PFM is asbestiform. 'Asbestiform' is determined by morphology and properties of fibres, including: longer than Longer than 5 µm, width less than 3 µm and with an aspect ratio (length to width) of not less than 3:1; flexible; bio-insoluble.

EPA SERVICES COMMENT	PROPONENT RESPONSE
DEMIRS has raised concerns about the lack of progressive rehabilitation undertaken thus far at the Telfer Mine site. Without confidence that rehabilitation can successfully restore a reasonable degree of ecological function post-disturbance at a large scale, rehabilitation alone has limited value as a mitigation option for reducing the environmental impact of proposals. Until there is greater confidence, alternative steps within the mitigation hierarchy (avoid, minimise, offset) may be more relevant to reduce or offset the impact. **Action** Provide further information to demonstrate successful rehabilitation of the flora and vegetation assemblages at Havieron is likely with regard to restoration or repair of ecosystem processes to support self-sustaining ecosystems that are able to support conservation significant fauna of the area.	Telfer Mine Closure Plan RegID 500231 was approved 3 April 2025. Progressive rehabilitation towards final closure is an expectation of all miners. Greatland have been in recent discussions with DEMIRS about the rate of rehabilitation of high-risk facilities such as waste rock dumps, tailings storage facilities and dump leaches. The quality and the success of the progressive rehabilitation has not been questioned by DEMIRS, however it is noted that there is a strong desire for an increased rate of completion for individual domains. Progressive rehabilitation has been undertaken at Telfer for 20 years across various domains and landforms as they become inactive, including the tailings storage facility (TSF 1 - 3), waste rock dumps (WRDs) (WRD6, WRD10, WRD13 and Southern Waste Dump/OSM64), airport and borefield areas. Rehabilitation trials have been undertaken, which the informs the rehabilitation treatments used for each landform. The trials success was most recently assessed by Mine Earth (Mine Earth 2024) and outlines the treatment that has been most successful at Telfer. This success, and alignment with analogue sites, is increased through the sourcing and use of high-quality endemic seed, mixed specifically to the location and remnant native vegetation. Rehabilitation monitoring is undertaken annually at Telfer using remote sensing metrics, with the results compared to the approved completion criteria identified in the Mine Closure Plan. The 2024 rehabilitation monitoring (Spectrum, 2024) found “remote sensing metrics indicated 75.4% (421.4 ha) of the 559.3 ha of rehabilitated land at Telfer is meeting all completion criteria. The total rehabilitated land achieving all completion criteria increased by 13.8% relative to 2023”. The above demonstrates that successful rehabilitation of flora and vegetation assemblages is likely to be achieved at Havieron.
Comment 20. EPA Services notes several technical reports referenced in the RSD have not been provided. **Action** Revise documentation to list and provide all reports referenced within the ERD.	**Response to Comment 20:** Referenced technical reports are provided and clearer cross-referencing applied throughout the RSD. This listing is provided on the cover page of this response document.
EPA Services notes several of the proposed environmental outcomes for key environmental factors do not appear to be SMART. Where environmental outcomes do not provide confidence that the EPA’s environmental objectives can be met, conditions will be imposed to address these gaps.	A substantial number of best practice mitigations are proposed to achieve environmental objectives for all key and other factors. A suite of outcomes are proposed in the Significant Species Management Plan (Appendix J). Underpinning SMARTER actions at an activity level can only occur once a draft Ministerial Statement is received.

EPA SERVICES COMMENT	PROPONENT RESPONSE
EPA Services advises the proponent to liaise with Industry Regulation (DWER) if a decision will be made to backfill the underground operations at Havieron, as this will require an assessment under Part V of the EP Act. **Action** Liaise with DWER to ensure early engagement on the requirements of any Part V under the BC Act.	Greatland will continue to liaise with the Department of Water and Environmental Regulation (DWER) relating to Prescribed Premise Categories outlined in Schedule 1 of the EP Regulations. Whilst reclamation of tailings for paste backfill requires an approved Mining Proposal (refer RSD Section 12), the use of that material in underground workings will be encompassed in the Mining Proposal for recovery of Havieron ore (scheduled for late 2027). As part of mine closure planning, if there is potential for waste disposal within the mine shaft at closure this will be specifically discussed with DWER.
EPA Services advises the proponent to liaise with the Department of Biodiversity, Conservation, and Attraction (DBCA) with regard to section 40 authorisation under the Biodiversity Conservation Act 2016 (BC Act). Based on the information provided, section 40 authorisation under the BC Act may be required for the take of threatened fauna. It is important to note that the definition for the take of fauna under the BC Act includes both direct take (i.e. to kill, injure, harvest or capture) and indirect take (i.e. to cause or permit any killing, injuring, capture or harvest). **Action** Liaise with DBCA to ensure early engagement on the requirements of any s. 40 authorisation under the BC Act.	Wording has been revised to remove any reference to the 'take' of fauna. There is an unlikely situation where pre-clearance bilby survey may identify an active burrow, work will cease and consultation with DBCA undertaken.

Table 2 – Response to Public Submissions

No.	PERSON OR ENTITY	SUBMISSION	PROPONENT RESPONSE
General			
1.	Submitter B	The actual impact of the proposal is unclear as the Referral Supporting Document (RSD) and the Proposal Content Document (PCD) do not provide a breakdown of disturbance by activity. It is difficult to identify high-risk activities as the documents do not include figures and tables detailing the disturbance footprint or infrastructure location. The submitter also noted that the proponent previously exceeded the approved disturbance footprint at the Telfer mine site.	Disturbance by activity is contained within Mining Proposals and not generally within environmental referrals. The Mining Proposal is available online through DMPE website. Maps throughout the RSD and the Proposal Content Document show the existing and proposed disturbance footprint and outline the mine infrastructure. Maps showing proposed infrastructure developments at Havieron have been provided to JYAC and the Martu at Relationship Committee Meetings during 2022 and 2023.

No.	PERSON OR ENTITY	SUBMISSION	PROPONENT RESPONSE
			Greatland acquired Telfer in 2024 and note as part of sale due diligence that operations at Telfer have been conducted in accordance with environmental approvals. The basis for the comment regarding exceeding approved disturbance is unclear.
2.	Submitter B	The proponent does not assure confidence regarding adequate protection of vegetation during works given the documents do not define what constitute a "large" tree and due to the use of the phrase "where this is possible".	The inclusion of specific protection of "large" trees where possible was identified by Martu monitors during an inspection of the Camp Dome Road corridor in 2024, and the documentation reflects the wishes of those Martu monitors. The broader context is that there is a requirement to undertake improvement works (including widening and straightening) on that road within an identified corridor, and that Martu monitors indicated a preference that road works avoid large trees if possible. Martu did not elaborate on what actually constitutes a "large" tree but Eucalyptus camaldulensis is an obvious inclusion. Greatland have committed to undertake monitoring with Martu during project development to minimize impacts to the existing tree canopy.
3.	Submitter B	The information regarding the length of the life of mine (LoM) is inconsistent across the documents. Whilst the referral supporting document includes the life of mine of 18 years, the groundwater drawdown modelling conducted by Rockwater was based on LoM of 13 years.	Confirming the current Life of Mine proposal for Havieron is 13 years of mining operations followed by 5 years of rehabilitation. This aligns with the groundwater modelling done by Rockwater, and submission has been updated.
4.	Submitter B	One submitter noted that the approval of the amended Groundwater Licence Operating Strategy (GLOS) requires confirmation of the presence of continuity of stygofauna habitat and lower drawdown impacts. The submitter queried whether this work has been undertaken or whether the proponent is required to undertake further work due to questionable suitability of groundwater drawdown modelling undertaken for a shorter life of mine.	The Rockwater model is for the drawdown period of the mine, which is 13 years and is not in question.
5.	Submitter B	The information regarding the potentially fibrous material and respirable fibres identified in Havieron ore references two memos authorised by Glossop Consultancy. One submitter queried why these memos were not published with the other documents.	Potentially fibrous materials are a workplace health and safety issue and determined not to be a public health issue. Greatland has provided technical reports to JYAC who are the key stakeholder.

No.	PERSON OR ENTITY	SUBMISSION	PROPONENT RESPONSE
			Greatland have undertaken a risk assessment and developed the Naturally Occurring Asbestos Management Plan for Havieron. This document identifies all the tasks from exploration, drilling, mining, crushing, material handling, stockpiling, loading/unloading, haulage, processing, cons handling and tailings. Identification of all risks, the available controls, and a thorough assessment and outcome of how Greatland are going to monitor and manage any risks over the course of the project. There are no fibrous materials in the over-burden. However, once environmental approvals are in place the project will implement the abovementioned measures as part of the Havieron Mining Proposal Stage 2 that is currently under development for the mining phase of the project.
Flora and Vegetation			
6.	Submitter A	The proposal has the potential to have an impact to high quality habitat for significant flora as a result of clearing of additional 630 ha vegetation that includes priority flora species in excellent condition. The proponent needs to review and reduce the scale of clearing and disturbance.	Clearing has been reduced to as low as reasonably practicable through the use of Sub-Level Open Stoping mine method (i.e. no open pit), re-use of existing processing plant at Telfer, and use of existing historically cleared areas. RSD Section 5 outlines the mitigations to avoid vegetation types that may contain priority species or provide ecosystem dependencies, being 1d, 6c, 6i, VT3, V17 and *Eucalyptus camaldulenis*. This occurs through design and during pre-clearance targeted surveys. *Goodenia hartiana* (P2) is widespread within and surrounding the Development Envelope. Direct losses will be minimised where possible but, given the extent, are not considered significant. Commentary of *G. hartiana* is provided in RSD Section 5.
Subterranean fauna			
7.	Submitter A	One submitter raised concerns about the potential impacts of proposal to stygofauna.	Stygofauna sampling was completed on 33 groundwater bores established at Havieron and 41 existing bores at Telfer (Biologic, 2020). An additional 25 samples and DNA analysis on a sub-set

No.	PERSON OR ENTITY	SUBMISSION	PROPONENT RESPONSE
		• The submitter highlighted that the volume of groundwater (2 GL per annum) to be abstracted for the proposal is estimated to have a significant impact to stygofauna by reducing available potential habitat by 15 percent. The proponent should implement controls to maintain potential habitat to ensure a recovery of stygofauna in the area. • Seepage from the waste rock landform poses risk to stygofauna and their habitat. Given seepage issues have been previously occurred at TSF7, sufficient controls should be applied to prevent contamination from acid forming waste rock, hydrocarbons, chemicals and saline water.	of those was completed (Biologic, 2021). Habitat modelling was completed based on the Havieron hydrogeological model to determine impacts on stygofauna habitats from the drawdown of groundwater associated with abstraction of mine water (Rockwater, 2021). More than 500 specimens belonging to eight stygal taxa and nine amphibious taxa were recorded across 13 of the 33 bores in the Havieron study area. The remaining 20 sites monitored recorded no specimens. Of the 17 taxa, four occurred outside the predicted groundwater drawdown zone, and a further nine are known to be regionally widespread. These 13 taxa will not be impacted by the Havieron Proposal. Of four taxa within the predicted drawdown zone: two are at locations where groundwater drawdown will be insignificant; and two are in a zone predicted to have drawdown of a maximum of 1m. Whilst the latter is not considered significant, ongoing monitoring and model validation against actual drawdown is required to confirm this and is likely to be an approval condition.
Terrestrial fauna			
8.	Submitter A	The submitter raised concerns about potential impacts of the proposal to terrestrial fauna. Specific issues raised included: • The proposal will result in high quality habitat fragmentation, loss and degradation. • Given the potential presence of short-range endemic invertebrates (SRE invertebrates) within the proposal area, the proposal has the potential to result in significant decline in SRE populations. Additional data should be obtained to confirm the presence of SRE invertebrate habitat and mitigations should be applied accordingly.	A Detailed Vertebrate and SRE Survey was completed by Biologic in 2020 and 2021 (refer Appendices L and M). Furthermore, detailed assessment of this issues is provided in Section 6 of the referral. All surveys are provided as appendcies. The greatest linear fragmentation risk is the proposed haul road. The design utilises an existing cleared road and has designed in the order of 50 culverts and eco-ducts along the 55km road.
9.	Submitter A	Offsets have been proposed for the loss of habitat for night parrot and greater bilby. However, the offsets will provide no additional habitat for critical habitat lost due to clearing. The submitter states that detailed protection strategies for conservation significant flora and fauna should be applied, and if required, a scientifically rigours biodiversity offsets strategy should be applied.	No critical nesting or roosting habitat for night parrot or active greater bilby burrow will be cleared. The offset is Assessment of significant impacts against EPBC criteria is provided in RSD Section 14 and takes into account traffic strike risk in addition to land clearance.

No.	PERSON OR ENTITY	SUBMISSION	PROPONENT RESPONSE
			The biodiversity offset targets a 3,200 ha area within the Lake Waukarlicarly IPA, focusing specifically on the riparian zone surrounding the salt lakes. This area is suitable because it does provide potential habitat for Night Parrot and Greater Bilby but requires conservation effort to manage habitat quality (currently assessed as a starting quality of 7) and ease threats to species such as cats, fox and camel (refer RSD Section 13 for further information on suitability, ecological gain, and calculations). The offset actions are designed to increase the population, provide for species extended range, and increase high quality habitat towards a final quality of 10 for the target species. The offset is informed by current conservation advice, Martu knowledge, and Annual Work Planning is undertaken through the adaptive management process outlined in Figure 5 of the OMP (Appendix zEE). Greatland and Martu ecological advisors have undertaken the first field trip for planning of year 1 offset actions as part of the Adaptive Management Framework. As an additional note, the offset has been revised to formally include Greater Bilby.
10.	Submitter A	The proposed evaporation ponds pose risk to fauna due to likely drowning and/or consumption of contaminated water. Considering that the risk to migratory birds and bats from ponds has not been assessed, the proponent should apply sufficient mitigations to protect wildlife from accessing the evaporation ponds and undertake wildlife monitoring including recording the number of fauna fatalities. Conditions should be applied to mitigate the associated risks.	Evaporation ponds are fenced, egress matting installed, and the facility inspected daily. An additional assessment of migratory birds listed under s.20 of the EPBC Act has been completed and is provided in RSD Section 14.
11.	Submitter B	The proponent has revised Outcome 2 for the greater bilby that states: *"No removal of primary (critical) habitat for the greater bilby*". Considering that it is unclear whether the definition of critical habitat refers to mapped critical habitat or to the definition of critical habitat provided on page 83 of the RSD, the submitter believes that the proponent may still remove active bilby burrows found within the development envelope.	Whilst terminology used in the original baseline surveys (Biologic 2020 and 2021) was correct at that time the DCCEEW Recovery Plan for the Greater Bilby (Macrotis lagotis) 2023 was released. This considers Greater Bilby across its distribution to be a metapopulation and any location where the species are known or likely to occur within that distribution to be critical habitat. This terminology has been adopted and the classification of Greater Bilby habitat revised throughout the RSD. Greatland consider the land clearance of up to 630 ha to be critical habitat that could be

No.	PERSON OR ENTITY	SUBMISSION	PROPONENT RESPONSE
			used by Greater Bilby. For this reason, it has been formally included in the offset. The commitment made is to “No removal of active Greater Bilby burrows”. Where these are identified in pre-clearance surveys, they are either avoided and a 100m buffer established as land clearance passes (noting this is accompanied by Martu fauna spotters). If avoidance is not possible then DBCA relocation protocols will be applied in accordance with the Significant Species Management Plan (Appendix J). It should be noted that Greater Bilby are highly mobile and the actual utilisation of the Havieron development envelope as identified through annual population monitoring is low and sporadic in response to resources. Pre-clearance survey by a trained ecologist accompanied by Martu who hold ecological knowledge, is therefore vital. Fauna spotters at the time of land clearance provide final due diligence that dispersal or burrow evacuation has occurred.
12.	Submitter B	The documents outline the assessment of direct impacts to night parrot habitat due to its removal. However, the proponent did not undertake assessment to quantify indirect impacts to night parrot individuals and population.	As agreed with JYAC, indirect impacts have been considered in the Biodiversity Offset Management Plan. Monitoring (Appendix J), with conservation actions and survey activities planned annually through the Adaptive Management Framework that ensures both Greatland and JYAC have approved the funding and Martu resources can be allocated.
13.	Submitter B	The proposed mitigation measures associated with the implementation of speed limits during certain hours in order to reduce direct impacts on conservation significant species are not likely to accurately quantify impacts from vehicle strikes. To accurately quantify and assess the effectiveness of the proposed mitigation measures, one submitter suggests undertaking daily or biweekly inspections along the 500 metre stretch of road surrounding active significant fauna sites.	Greatland believes that the proposed measures are adequate to mitigate impacts to conservation-significant species. Recent engagement with JYAC confirmed that both parties agreed that inspections in this manner are not a prudent methodology for protection. Inspections are undertaken continuously, and the reporting protocol will be applied throughout Life of Mine. Any notifiable incidents pertaining to Bilby and/or NP are reported to JYAC through the Martu Relationship Committee.

No.	PERSON OR ENTITY	SUBMISSION	PROPONENT RESPONSE
Inland waters			
14.	Submitter B	The proponent's documents state the approximate life of mine is 18 years excluding rehabilitation and closure stage. The drawdown modelling undertaken by Rockwater is based on a 13-year life of mine. One submission queries whether additional drawdown modelling is appropriate for the actual proposed operational life.	Confirming the current Life of Mine proposal for Havieron is 13 years of mining operations followed by 5 years of rehabilitation. This aligns with the groundwater modelling done by Rockwater, and submission has been updated.
Greenhouse gas emissions			
15.	Submitter A	The proposal's total greenhouse gas (GHG) emissions over the project life pose substantial residual and cumulative risk to the environment and will contribute to emissions and climate impacts of Western Australia. The proposal should provide additional mitigations to GHG emissions to minimise the environmental impacts from climate change. The proponent should provide further details on their Net Zero Management Plan.	In accordance with the Greenhouse Gas Emissions Policy for Major Projects (2024) the Telfer – Havieron Proposal will be governed by the *National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015* and not be included in a Ministerial Statement should the proposal be approved. Strict rules apply to meeting facility-specific emissions intensity values and requiring integrity-based offsets for any emissions above baseline. The RSD Section 7 has been revised to meet the revised EPA Factor Guideline: Greenhouse Gas Emissions (November, 2024). The trajectory of emission is downwards based on the progressive depletion of Telfer mineral reserves. Greatland are also reviewing the renewables strategy to employ all practicable means of reducing GHG emissions and emissions intensity.
Social surroundings			
16.	Submitter B	The proposed outcome for social surrounding stating "No direct disturbance to any heritage exclusion zones developed in consultation with the Martu Traditional Owners" should be revised to include both direct and indirect disturbance impacts.	In accordance with the requirements of our ILUA with JYAC, extensive cultural heritage surveys have taken place on areas subject the proposed Havieron project. Exclusion zones identified during these surveys are an important part of cultural heritage protection. This includes direct and indirect. As part of Greatland's ongoing protection of cultural heritage, Greatland are working with JYAC and Martu to conduct regular

No.	PERSON OR ENTITY	SUBMISSION	PROPONENT RESPONSE
			inspections of identified cultural heritage exclusion zones of the project area.
Other			
17.	Submitter A	The submitter asserts that the proposal should implement a comprehensive decommissioning strategy prior to end of field life. The proponent needs to demonstrate that sufficient funds are secured for implementation of full decommissioning and rehabilitation tasks to the highest standard.	This forms part of the statutory obligation under the *Mining Act 1978* for a Mining Proposal to be submitted and approved by DMPE. These have now been combined in WA to be a Mining Development and Closure Plan (MDCP) to formally link the whole of mine cycle through to decommissioning and rehabilitation. This is in advanced drafting and will be finalised if approvals are received.
18.	Submitter B	Given the emergency water discharge occurred from the existing Havieron evaporation ponds in March 2024, one submitter raised concerns about the suitability of proposed mitigation measures to prevent potential overflow of evaporation ponds. Although the document states that evaporation ponds will have adequate freeboard to prevent over-tipping and sufficient capacity for rainfall events, it is unclear how much freeboard will be incorporated.	Evaporation Ponds are approved and licensed under Part V of the Environmental Protection Act. Background on the rationale behind the mitigation measures was included in the Havieron Prescribed Premise Operating Licence Application for Evaporation Ponds 1-3 which was provided to JYAC in September 2024. Freeboard of 500mm is designed into account for wave runup and direct rainfall. An additional salt allowance of 300mm is also included in future ponds. Greatland is committed to sharing project information with JYAC, ensuring ongoing consulting and collaborating with JYAC.
19.	Submitter B	The revised referral supporting document includes the following mitigation measure of the management of soils: "*Any material used for construction (particularly in in the Havieron infrastructure corridor) shall be considered appropriate. Dispersive or saline material will not be avoided as a construction material*". One submission outlines that the stated mitigation measure is not appropriate, and the proponent needs to revise this mitigation measure as it suggests the likely use of dispersive or saline material for construction.	Topsoil that is removed during construction is stockpiled as per Works Approval conditions and managed to ensure it can be used in rehabilitation of areas for mine closure. Topsoil is not used in construction. The criteria for use of sub-soils or waste materials is specified in civil construction documents and based on confirmed non-dispersive properties and competence of materials. Discussion has been added to the updated RSD (refer Section 12.3.5).

No.	PERSON OR ENTITY	SUBMISSION	PROPONENT RESPONSE
20.	Submitter B	The proposed mitigation measures for the management of tailings lack details regarding the controls for seepage and dust emissions.	Tailings are managed through the existing facilities at Telfer, mitigation measures relating to tailings are dealt with under various Telfer Mining Proposals (Mining Act) and Licenses (Part V of the Environmental Protection Act). The RSD Section 12.3 has been updated to provide more details both on Havieron tailings and existing storage facilities at Telfer that will receive them.
21.	Submitter B	Proposed offset strategy is inadequate and does not compensate the potential impacts to night parrot and greater bilby: • The proposed 1:1 ratio does not fully account the indirect impacts to night parrot, greater bilby and great desert skink. The submitter noted that a 1:5 ratio is standard in other regions of Western Australia and can increase to 1:20 in exceptional cases. • The project offset funding is limited to five years of the Havieron operations, whereas the Telfer/Havieron project has a life of mine of 18 years. It is unclear whether the proposed offset area of 630 ha, which does not account for previous disturbances of 7,460 ha at Telfer and Havieron sites is sufficient to ensure night parrot primary habitat is maintained and improved in the lake Waukarlicarly offset area.	The Offset Management Plan has been substantially revised and will fund Annual Work Plans covering an area of approximately 3,200ha, the Offset Area, over the life of the Havieron project. Te assessed impact rating for the offset is 94.44% for Night Parrot and 249.37% for Greater Bilby against an EPBC minimum requirement of 90%. Refer Appendix zEE - Offset Management Plan for full calculations and further discussion. This revised Offset Management Plan has been agreed by JYAC and the first planning field trip with Martu completed in November 2025.

Table 3 - Updates to RSD

General updates throughout RSD Revision 9
• RSD Revision 9 has been aligned both in language and structure to the *EPA Instructions: How to prepare an environmental review document, March 2024*. This ensures all required sections in a manner conforming to EPA expectations. • The term 'Amended Proposal' previously used to describe the Havieron Mine proposal has been changed to 'Significant Amendment' throughout the RSD to reflect the *EP Act* terminology and avoid confusion. • Supporting appendices for flora, vegetation and fauna are presented as stand-alone documents rather than the previously merged appendices. This allows for clearer referencing and ease of navigation. • RSD has been changed to a Greatland document and is submitted directly by the proponent rather than in a consultant format. Whilst it is acknowledged that a 'track changed' revision is normally submitted it was not possible given the change from consultant format and wholesale changes to the structure of the document. For this reason a section-by-section statement of changes is provided below.

RSD advertised Revision 6 section number and title	RSD Revision 9 section number and title	Changes and reason
1. Introduction 1.1 Purpose and scope 1.2 Referral history 1.3 Proponent details	1 Proposal 1.1 Proposal content 1.2 Proposal alternatives 1.3 Local and regional context	• Structure aligned with EPA instructions. • Provide the accepted Project Contents Document (PCD) as a table. • Proponent changed from Newcrest Operations Limited to Greatland Pty Ltd in November 2024. • Referral history included in Document Control section showing each revision. • Tenure table revised to reflect the current status of tenure ownership.
2. The Proposal 2.1 Approved Proposal (Telfer) 2.2 Amended Proposal – Telfer-Havieron Gold Mining Project 2.3 Justification and Proposal Alternatives 2.4 Local and Regional Context	Incorporated into Section 1	To align with EPA instructions.
	2 Legislative context 2.1 Environmental impact assessment process 2.2 Other approvals and regulation	Section structured to align with EPA instructions. Only minor streamlining of content for readability.
3. Stakeholder Engagement 3.1 Stakeholders	3 Stakeholder Engagement 3.1 Key stakeholders	Section structured to align with EPA instructions.

RSD advertised Revision 6 section number and title	RSD Revision 9 section number and title	Changes and reason
3.2 Stakeholder Engagement Process 3.3 Stakeholder Consultation	3.2 Stakeholder engagement process 3.3 Stakeholder consultation outcomes	Only minor streamlining of content for readability. New Appendix B added (letter of support from JYAC representing Martu Traditional Owners).
4. Object and Principles of the EP Act 4.1 Principles 4.2 Environmental factors	4 Object and Principles of the EP Act 4.1 Principles 4.2 Environmental factors	Only minor formatting changes for readability. Clearer determination of the relevance of all environmental factors presented in Table 4-2.
5. Flora and Vegetation	5. Flora and Vegetation – Key Factor	Substantially revised to reflect the requests for further information. Appendices split and more clearly referenced within the section. Additional sub-section added for cumulative impact assessment undertaken for *Goodenia hartiana*
6. Terrestrial fauna	6. Terrestrial fauna – Key Factor	Substantially revised to reflect the requests for further information. Appendices split and more clearly referenced within the section. Additional information provided in Night Parrot sub-section to convey study effort and other requested information. New Appendices zHH (specialist Night Parrot habitat review) and zII (targeted Night Parrot habitat survey) added.
7. Greenhouse Gas Emissions	7. Greenhouse Gas Emissions	Updated to align to the revised Environmental Factor Guideline: Greenhouse gas emissions, 2024. Greenhouse Gas Management Plan (formerly Appendix F) removed to reflect regulation under the Federal Safeguard Mechanism.
8. Social Surrounds	8. Social Surroundings – Key Factor	Minor revisions to more clearly outline studies undertaken and to improve readability. New Appendix B referenced (letter of support from JYAC representing Martu Traditional Owners).

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9. Subterranean Fauna	9. Subterranean Fauna – Key Factor	Minor revisions to improve readability and referencing.
10. Other Environmental Factors 10.1 Air quality	10. Air quality	Minor revisions to improve readability.
10.2. Inland Waters 10.3 Terrestrial Environmental Quality	11. Inland Waters – Key Factor	Title of section elevated and revised to reflect EPA determination of Inland Waters as a key factor. Minor revisions to improve readability and referencing.
	12. Terrestrial Environmental Quality – Key Factor	Title of section elevated and revised to reflect EPA determination of Terrestrial Environmental Quality as a key factor. Section 12.3.4 substantially updated to reflect requests for information regarding Telfer Tailings Storage Facilities. Added Section 12.3.7 to provide requested information on Havieron hypersaline water and a discharge event.
11. Offsets	13. Offsets	Substantially revised
12. Ministerial Statement Changes	Removed	Greatland have declined to provide this optional section and propose to work collaboratively with the EPA given the Significant Amendment will be governed by a single Ministerial Statement across the Telfer – Havieron Proposal.
13.Holistic and Cumulative Impact Assessment	Incorporated into Section 15	Now presented in Sections 15 Holistic Impact Assessment
	14. Matters of National Environmental Significance	New section provided to align with EPA instructions. This section outlines the EPBC referral, Significant Impact Assessment for MNES species against EPBC criteria. This section also provides alignment of the proposed action against conservation advice.

RSD advertised Revision 6 section number and title	RSD Revision 9 section number and title	Changes and reason
	15. Holistic Impact Assessment	Provided as a stand-alone section and includes reference to cumulative assessments undertaken for Flora and Vegetation, and Terrestrial Fauna to avoid significant repetition. Cumulative impacts are also clearly discussed in the Executive Summary.