

Environmental Protection Act 1986

Section 40(2)(a)

NOTICE REQUIRING INFORMATION FOR ASSESSMENT

PERSON TO WHOM THIS NOTICE IS GIVEN

Westralian Iron Pty Ltd (ABN 66 106 448 695)
Unit 2, 2 Richardson St
WEST PERTH WA 6005

PROPOSAL TO WHICH THIS NOTICE RELATES:

Koolanooka Hills – Exploration Proposal (M70/1164-1 and M70/1190-1)

Pursuant to section 40(2)(a) of the *Environmental Protection Act 1986*, I, as a delegate of the Environmental Protection Authority (EPA), require that you provide the EPA with the following information for its assessment.

1. Flora and Vegetation

- **Surveys:** Please provide up to date survey reports that have been used to inform the impact assessment, including figures. Please ensure surveys and data provided are in accordance with EPA's *Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment*.
- **Priority Species:** *Drummondita rubriviridis* is a range-restricted species, with a known total linear distribution of 5 kilometres. It is not clear from the maps provided, the degree to which the proposed impact would fragment the species, or whether other indirect impacts are likely. Please provide further detail on the potential impact to this species (direct and indirect).
- **Rehabilitation:** No evidence has been provided to demonstrate that the proposed mitigation and management actions would be suitable or effective at mitigating potential impacts; and no evidence has been provided which demonstrates the outcome of Westralian Iron's previous rehabilitation in the area. Similarly, there is no evidence that broadcasting of seeds is likely to be an appropriate strategy for effective germination and establishment of the priority species.

Please provide information to demonstrate past rehabilitation success, and justification (trials, evidence) that the proposed mitigation and rehabilitation techniques would be successful.

- Access to site: Given the environmental sensitivity of the Koolanooka Hills, please provide detail on how access to and from the site will be provided in a manner that minimises impacts to the area.

2. Terrestrial Fauna

The information and referral supporting documents are based on out-of-date survey data, the referral supporting document does not adequately recognise the significance of the Koolanooka Hills for fauna. Please address the following:

- Surveys: Aurecon's (2021) impact analysis is based on information from previous surveys (<2006) and it is not clear if previously surveyed areas are within the proposed impact area. Please provide up to date terrestrial fauna surveys which meet the relevant EPAs technical guidance and demonstrate that the survey data is relevant to the site which is under assessment.
- Short range endemics (SRE): SREs have not been discussed in enough detail to assess the potential impact. Please provide further detail on the potential impacts to SREs and include the data which has been used to inform the impact assessment.
- Arid Bronze Azure Butterfly (*Ogyris subterrestris petrina*): the potential impact to the critically endangered Arid Bronze Azure Butterfly (ABAB) is unable to be assessed based on the information as presented. Please provide further information to enable an assessment of the potential impact to this species (e.g. targeted survey results for the host ant species *Camponotus sp. nr. terebrans* if necessary).

3. Social Surroundings

Please provide further detail regarding the Standard Heritage Agreement between Yamatji Southern Regional Corporation and Westralian Iron, including whether this agreement has progressed beyond initial engagement with the Yamatji Southern Regional Corporation. If the agreement is progressing, please provide further information including a description of the scope of the agreement and the proposed timeline to formalising and implementing the agreement.

4. Provision of IBSA data package

It is currently unclear whether an Index of Biodiversity Surveys for Assessments (IBSA) data package for each biodiversity survey report has been submitted in accordance with the Instructions and Form: IBSA Data Packages. These instructions and forms are available on the EPA website www.epa.wa.gov.au/forms-templates/instructions-preparing-data-packages-index-biodiversity-surveys-assessments-ibsa

Please submit your IBSA package and provide the reference number received on submission.

5. Proposal Content Document

Please include a Proposal Content Document, which adequately characterises the proposal. The template and instructions for defining the general proposal content description and the proposal content elements for new proposals can be found on the EPA website at: <https://www.epa.wa.gov.au/forms-templates/instructions-how-identify-content-proposal-proposal-content-document>

6. EP Act Amendments

Amendments to the EP Act were passed by the Western Australian Parliament in November 2020 and recent amendments relating to Part IV of the EP Act came into force on 22 October 2021. To implement the amendments, the EPA has revised its Environmental Impact Assessment (EIA) procedures suite. The revised procedures suite includes the EPA's *Environmental Impact Assessment (Part IV Divisions 1 and 2) Administrative Procedures (2021)*, *Environmental Impact Assessment (Part IV Divisions 1 and 2) Procedures Manual (2021)* and other documents to support EIA.

Additional documents include the *Statement of Environmental Principles, Factors, Objectives and Aims of EIA (2021)*, a number of Interim Guidance documents, and a series of Instructions, Forms and Templates. Information regarding the transitional arrangements and interim guidance is provided on the EPA website [Supplementary materials | EPA Western Australia](#).

It is recommended that the Referral Information documentation be revised to include and address the requested additional information above, including appending any environmental management plans, and survey reports. Please see the EPA's guidance on [How to Prepare an Environmental Review Document](#) for further guidance.

Your response should be sent by email to registrar@dwer.wa.gov.au, marked for the attention of Principal Environmental Officer Natalie McAlpine, or by post to the Environmental Protection Authority, Locked Bag 10, Joondalup DC, Perth WA 6919. Please quote the case number 18107 on any further correspondence.

The EPA will not proceed with its assessment of the proposal until you have provided the requested information and it is considered to be adequate, or if you advise the EPA that the further information is not available and/or cannot be obtained.

Yours sincerely



Prof. Matthew Tonts
CHAIR

11 August 2022