RioTinto

Environmental Review Document

Mesa A Hub Revised Proposal

Assessment No. 2107

EPBC 2016/7843

Prepared for Rio Tinto by Eco Logical Australia

RTIO-HSE-0325438

Robe River Mining Co. Pty. Ltd.

December 2018

Invitation to make a submission

The Environmental Protection Authority (EPA) invites people to make a submission on the environmental review for this Proposal.

Robe River Mining Co. Pty. Ltd proposes to extend the life of the Mesa A/Warramboo Iron Ore Project through further development of the existing Mesa A and Warramboo operations and development of nearby deposits: Highway, Tod Bore, Mesa B and Mesa C. The Environmental Review Document (ERD) has been prepared in accordance with the EPA's *Procedures Manual (Part IV Divisions 1 and 2)*. The ERD is the report by the proponent on their environmental review which describes this Proposal and its likely effects on the environment.

The ERD is available for a public review period of two weeks from Monday 10 December, closing on Monday 24 December 2018.

Information on the Proposal from the public may assist the EPA to prepare an assessment report in which it will make recommendations on the Proposal to the Minister for Environment.

Why write a submission?

The EPA seeks information that will inform the EPA's consideration of the likely effect of the Proposal, if implemented, on the environment. This may include relevant new information that is not in the ERD, such as alternative courses of action or approaches.

In preparing its assessment report for the Minister for Environment, the EPA will consider the information in submissions, the proponent's responses and other relevant information.

Submissions will be treated as public documents unless provided and received in confidence, subject to the requirements of the *Freedom of Information Act 1992*.

Why not join a group?

It may be worthwhile joining a group or other groups interested in making a submission on similar issues. Joint submissions may help to reduce the workload for an individual or group. If you form a small group (up to 10 people) please indicate all the names of the participants. If your group is larger, please indicate how many people your submission represents.

Developing a submission

You may agree or disagree with, or comment on information in the ERD.

When making comments on specific elements in the ERD:

- Clearly state your point of view and give reasons for your conclusions.
- Reference the source of your information, where applicable.
- Suggest alternatives to improve the outcomes on the environment.

What to include in your submission

Include the following in your submission to make it easier for the EPA to consider your submission:

- Your contact details name and address.
- Date of your submission
- Whether you want your contact details to be confidential.
- Summary of your submission, if your submission is long.
- List points so that issues raised are clear, preferably by environmental factor.
- Refer each point to the page, section and if possible, paragraph of the ERD.
- Attach any reference material, if applicable. Make sure your information is accurate.

The closing date for public submissions is: Monday 24 December 2018.

The EPA prefers submissions to be made electronically via the EPA's Consultation Hub at https://consultation.epa.wa.gov.au.

Alternatively submissions can be:

- posted to: Chairman, Environmental Protection Authority, Locked Bag 33,
 Cloisters Square WA 6850, or
- delivered to: the Environmental Protection Authority, Level 4, The Atrium, 168 St Georges Terrace, Perth 6000.

If you have any questions on how to make a submission, please contact the EPA Services at the Department of Water and Environmental Regulation on 6364 7000.

Disclaimer and Limitation

This report has been prepared by Rio Tinto's Iron Ore group (**Rio Tinto**), on behalf of Robe River Mining Co. Pty. Ltd (the **Proponent**), specifically for the Mesa A Hub Revised Proposal. Neither the report nor its contents may be referred to without the express approval of Rio Tinto, unless the report has been released for referral and assessment of proposals.

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Acronyms

Actoriyins	
Abbreviation	Description
AH Act	Aboriginal Heritage Act 1972
AHD	Australian Height Datum
Air NEPM	National Environment Protection Measure for Ambient Air Quality
AMD	Acid and metalliferous drainage
ANZECC	Australian and New Zealand Environment and Conservation Council
ARMCANZ	Agriculture and Resource Management Council of Australia and New Zealand
ВНР	BHP Billiton
BWT	Below Water Table
CID	Channel Iron Deposit
CPI	Consumer Price Index
DAA	Department of Aboriginal Affairs
DBCA	Department of Biodiversity, Conservation and Attractions
DBP	Dampier Bunbury Pipeline
DEWHA	Department of the Environment, Water, Heritage and Art
DJTSI	Department of Jobs, Tourism, Science and Innovation
DMA	Decision Making Authorities
DMP	Department of Mines and Petroleum
DMIRS	Department of Mines, Industry Regulation and Safety
DoE	Department of the Environment
DotEE	Department of the Environment and Energy
DPC	Department of the Premier and Cabinet
DPLH	Department of Planning, Lands and Heritage
DRF	Declared Rare Flora
DSEWPaC	Department of Sustainability, Environment, Water, Population and Communities
DWER	Department of Water and Regulation
EC	Electrical Conductivity
EMP	Environmental Management Plan
EP Act	Environmental Protection Act 1986
EPA	Environmental Protection Authority
EPA Services	Environmental Protection Authority Services
EPBC Act	Environmental Protection and Biodiversity Conservation Act 1999
ERD	Environmental Review Document
ESD	Environmental Scoping Document
EWR	Environmental Water Requirements
GDE	Groundwater Dependent Ecosystem
GIS	Geographical Information System

Abbreviation	Description
НТР	Hardcap Pisolite
IBRA	Interim Biogeographical Regionalisation for Australia
IUCN	International Union for Conservation of Nature
KMAC	Kuruma Marthudunera Aboriginal Corporation
KN	Nanutarra Formation
LIC	Local Implementation Committee
LoM	Life of Mine
MEZ	Mining Exclusion Zone
MNES	Matters of Environmental and National Significance
MS 756	Ministerial Statement 756
NGER Act	National Greenhouse and Energy Reporting Act 2007
NTU	Nephelometric Turbidity Unit
PAF	Potentially Acid Forming
Parks and Wildlife	Department of Biodiversity, Conservation and Atractions - Parks and Wildlife Service (Previously known as the Department of Parks and Wildlife)
PEC	Priority Ecological Community
PPV	Peak Particle Velocity
Proponent	Robe River Mining Co. Pty. Ltd.
RTIO	Rio Tinto
Sand Sheet PEC	Priority 3 Sand Sheet Vegetation (Robe Valley) Priority Ecological Community
SCARD	Spontaneous Combustion and Acid Rock Drainage
SRE	Short Range Endemics
TDS	Total dissolved solids
TEB	Terrestrial Ecosystems Branch
TEC	Threatened Ecological Community
the Fund	Pilbara Environmental Offsets Fund
TMP	Troglofauna Management Plan
ТРВ	Basal Pisolite
TPC	Pisolite Clay
TPH	Upper Pisolite
TPM	Mixed/Massive Pisolite
VIA	Visual Impact Assessment
WA	Western Australia
WA Museum	Western Australian Museum
WC Act	Wildlife Conservation Act 1950
WFSF	Waste Fines Storage Facility

EXECUTIVE SUMMARY

Robe River Mining Co. Pty. Ltd. (the Proponent) operates the existing Mesa A/Warramboo Iron Ore Project located approximately 43 kilometres (km) west of Pannawonica in the Pilbara region of Western Australia (Figure ES 1). The Proponent is seeking to extend the life of the Mesa A/Warramboo Iron Ore Project through further development of existing operations and development of new deposits nearby. This will sustain the Mesa A/Warramboo Iron Ore Project total ore feed at up to 25 million tonnes per annum. This sustaining proposal is referred to as the Mesa A Hub Revised Proposal (the Revised Proposal) and is contained within a Development Envelope which includes the existing approved Mesa A/Warramboo Iron Ore Project (Figure ES 2).

The Revised Proposal is a revision of the existing Mesa A/Warramboo Iron Ore Project. The Proposed Change includes extension of the existing above water table Mesa A mine pit, extension of the existing above water table Warramboo Mine pit both above and below water table, and development of new nearby deposits: Highway/Tod Bore (above water table), Mesa B (above water table) and Mesa C (above and below water table) in the mine operations area (Figure ES 3). The Proposed Change also includes development of associated infrastructure, water treatment facilities, extension of the existing Warramboo borefield, processing facilities, water management infrastructure and mineral waste dumps. The Proposed Change will be undertaken in the western portion of the Development Envelope (Figure ES 2).

Mining is anticipated to involve conventional drill, blast, load and haul techniques; with mine dewatering required at Mesa C and Warramboo to facilitate below water table mining. Surplus water generated from dewatering the Warramboo deposit will be used on-site and for wet processing or, where scheduling does not allow this, it will be discharged by controlled release to Warramboo Creek, south-west of the proposed operations. To assist in the management of surplus water discharge to Warramboo Creek, surplus water may also be discharged into existing mine pits at Warramboo enabling passive recharge of water back into the aquifer.

The existing Mesa A/Warramboo Iron Ore Project includes a Mining Exclusion Zone (MEZ) to protect the integrity of the Priority 3 Sand Sheet Vegetation (Robe Valley) Priority Ecological Community (Sand Sheet PEC); retain troglofauna habitat; protect the integrity of the Mesa A escarpment and its fauna habitat, landscape and heritage values. The existing Mesa A MEZ requires a small revision as part of the Proposed Change, to accommodate preferential mining of higher quality ore, additional access and other minor clearing, while still maintaining the values as described above.

The Western Australian Environmental Protection Authority (EPA) has determined that the Proposed Change requires assessment under Part IV of the *Environmental Protection Act 1986*, which provides for the EPA to undertake Environmental Impact Assessment of significant proposals, strategic proposals and land use planning schemes. The Commonwealth Department of the Environment and Energy determined that the Proposed Change is a Controlled Action for listed threatened species and therefore requires assessment under the *Environment Protection and Biodiversity Conservation Act 1999*. The EPA is assessing the Proposed Change on behalf of the Commonwealth under Section 87 of this Act as an accredited assessment.

The purpose of this Environmental Review Document is to provide a report on the environmental review for the Revised Proposal to the EPA. The scope of the

Environmental Review Document is to present an environmental review of the principal components of the Proposed Change, including a detailed impact assessment and description of proposed environmental management measures for the key environmental factors in accordance with the Environmental Scoping Document prepared by the EPA. This Environmental Review Document has been prepared in accordance with the Environmental Impact Assessment (Part IV Divisions 1 and 2) Administrative Procedures 2016 (EPA 2016a) to meet the requirements of Section 40(2)(b) of the *Environmental Protection Act 1986*.

The preliminary key environmental factors relevant to the Proposed Change are (as outlined in the Environmental Scoping Document):

- Flora and Vegetation
- Subterranean Fauna
- Terrestrial Fauna
- Hydrological Processes and Inland Waters Environmental Quality
- Landforms
- Social Surroundings.

During the course of preparation of the Environmental Review Document, 'Air Quality' was requested to be included as an 'Other Environmental Factor' by EPA Services.

The Development Envelope for the Revised Proposal lies within the western Pilbara region, where the key landscape features are the watercourses, with associated pools (Robe River), locally significant riparian vegetation communities (Robe River and Warramboo Creek); and mesa formations which host gorges and rocky hills/breakaway fauna habitats. These landscape features occur in the Development Envelope, providing shelter and foraging opportunities for fauna (in particular fauna that are Matters of National Environmental Significance), including aquatic and cave habitats; habitat for subterranean fauna (troglofauna and stygofauna), and have heritage and amenity values. The Development Envelope also contains three Priority Ecological Communities being: Priority 3 PEC; Sand Sheet Vegetation [Robe Valley], Priority 1 PEC; the Subterranean invertebrate community of mesas in the Robe Valley region and the Priority 1 PEC; the Subterranean invertebrate community of pisolitic hills in the Pilbara.

The main Proposal activities that involve interactions between preliminary key environmental factors, and have the potential to impact significant environmental values, are land disturbance, mine pit excavation, abstraction of groundwater and discharge of surplus water. The Proponent has applied the mitigation hierarchy in the *Western Australian Environmental Offsets Guidelines* (2014) for all proposed activities, to reduce the potential for significant impacts to environmental values as a result of the Proposed Change. The Proposed Change design has focussed on avoiding potentially significant impacts to the environment. After avoidance strategies have been considered, mitigation measures have then been investigated to reduce the remaining significant impacts to an acceptable level.

One of the key features of the Proposed Change design to achieve this outcome is the delineation of a MEZ, which ensures the preservation of the mesa escarpments, through limiting clearing in this area while allowing mining of the internal mesa plateau. This approach is expected to protect a number of key environmental, heritage and amenity values in particular:

Subterranean Fauna

 Retention of at least 50% by volume of connected pre-mining troglofauna habitat at Mesas A, B and C

Terrestrial Fauna

Retention of key habitat features for significant fauna

Landforms

 Preservation of the prominence, scale and structural integrity of the mesas in the landscape

Social Surroundings

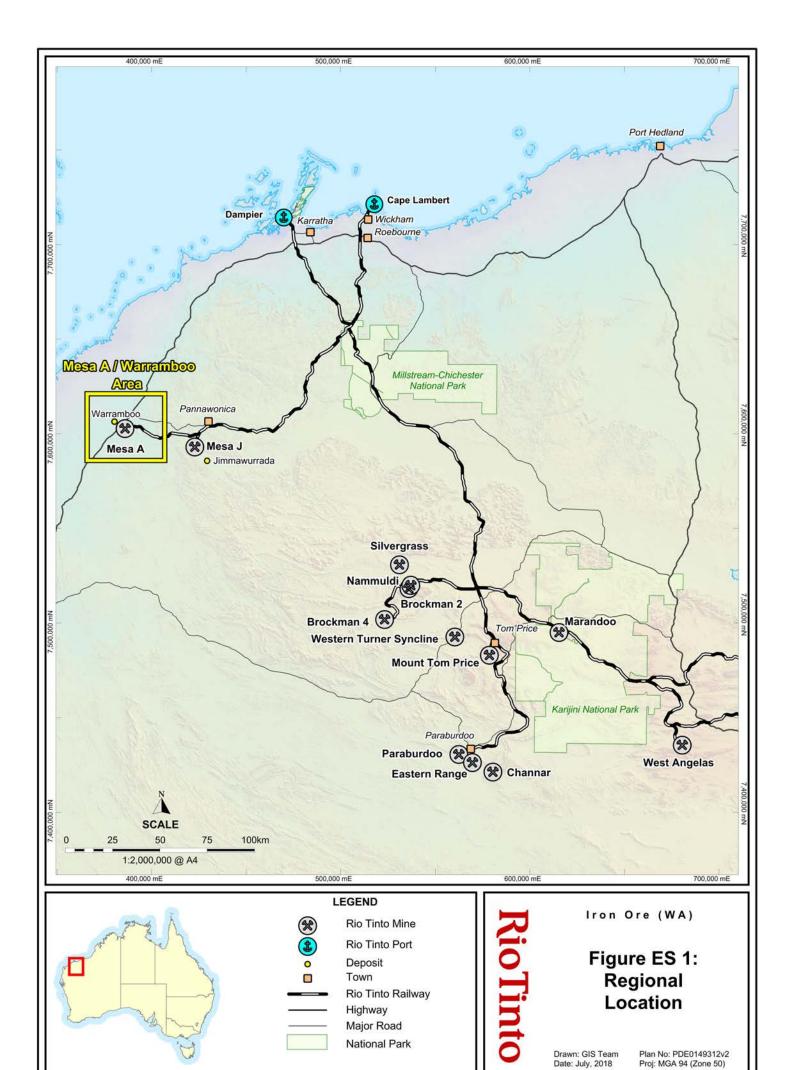
o Retention of key heritage sites.

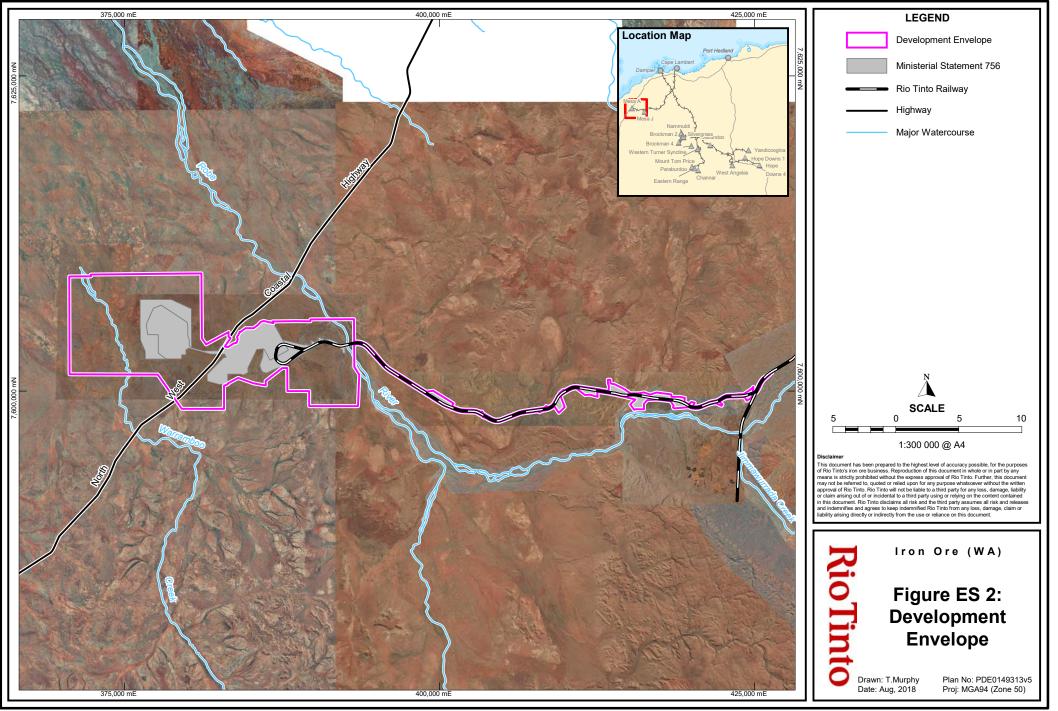
An overview of the Proposed Change, including the key Proposal characteristics, is provided in Table ES 1 and Table ES 2, and a full summary of the Environmental Review including the potential impacts, proposed mitigation and avoidance and residual impacts for each key environmental factor is provided in Table ES 3. A brief summary of the key outcomes of the Environmental Review is provided below.

The Proposed Change will involve the unavoidable clearing of 3,000 hectares (ha) of Good to Excellent condition native vegetation. There will be no direct disturbance to the Sand Sheet PEC as part of this clearing. The Proposed Change also avoids almost all direct disturbance of riparian vegetation associated with the Robe River and Warramboo Creek. The effects of groundwater abstraction and dewatering have been modelled extensively and no irreversible impact on riparian vegetation is anticipated because of dewatering or surplus water discharge. Ongoing monitoring of key environmental values will be undertaken to ensure that no unforeseen impacts occur from dewatering and surplus water discharge and that the significant river and creek systems near the Development Envelope are protected.

The troglofauna and stygofauna habitat present within each deposit is well connected and extends beyond the proposed impact areas. The proposed mitigation strategies for the Proposed Change, including the continuation of the MEZ approach adopted at Mesa A, are expected to be effective in reducing the potential for impacts to subterranean fauna. They should ensure the proposed mining at each deposit can be conducted such that the ecological integrity of troglofauna and stygofauna habitat, as well as the diversity and ecological integrity of the troglofauna and stygofauna assemblages present, are unlikely to be significantly impacted.

The Proponent considers the residual impact associated with the unavoidable clearing of native vegetation in Good to Excellent condition and clearing of two subterranean fauna community PECs and riparian vegetation to be significant. The Proponent proposes the provision of an environmental offset (\$750 per hectare) for the unavoidable clearing of native vegetation in Good to Excellent condition, and an environmental offset at the higher offset rate (\$1,500 per hectare) for the unavoidable clearing of two subterranean fauna community PECs and riparian vegetation. Based on the proposed avoidance of significant areas, proposed mitigation strategies and the continued implementation of existing management strategies (including offsets for the three identified potentially significant residual impacts), the Proponent considers that the EPA objectives can be met for all environmental factors. The Proposed Change is environmentally acceptable and can be adequately managed through the draft Ministerial Statement for the Revised Proposal.





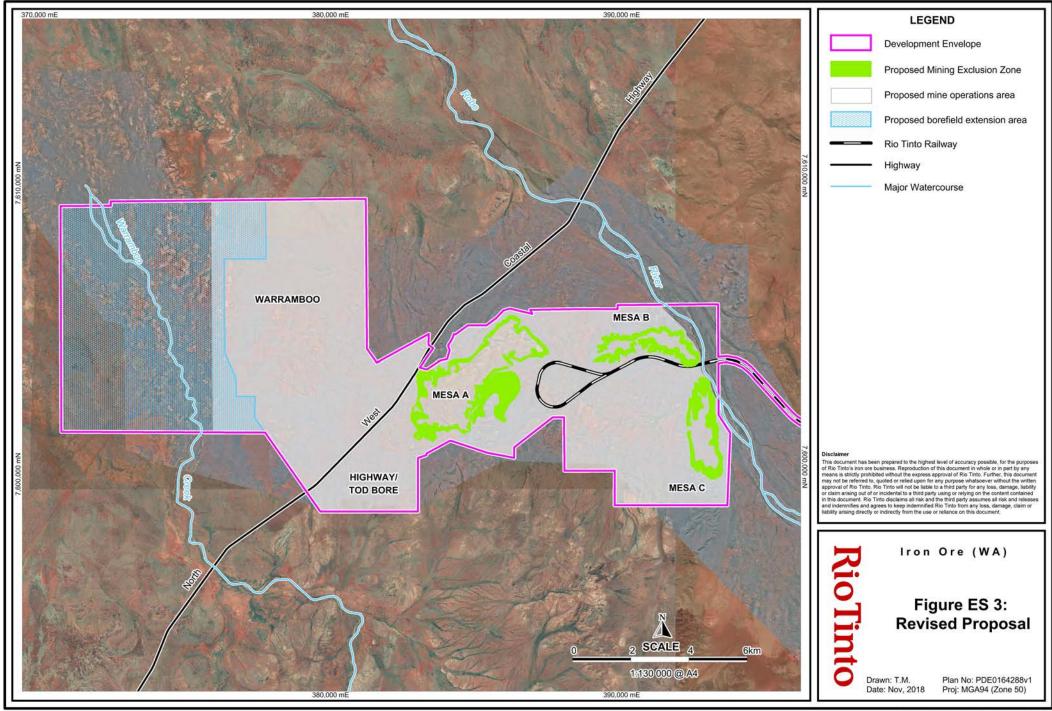


Table ES 1: Summary of the Revised Proposal

Proposal title	Mesa A Hub Revised Proposal	
Proponent name	Robe River Mining Co. Pty. Ltd.	
Short description	The Revised Proposal includes the existing Mesa A/Warramboo Iron Ore Project and a revision which includes development of additional mine pits and associated infrastructure, water treatment facilities, processing facilities and water management infrastructure, as well as expansion of existing mine pits, waste dumps and associated infrastructure.	

Table ES 2: Location and proposed extent of physical and operational elements

Element	Location	Existing approval (Ministerial Statement/s and other regulatory approvals)	Proposed Change	Proposed extent (Mesa A Hub Revised Proposal)
Physical elements				
Mine and associated infrastructure	Figure ES 2	Not more than 3,680 ha (with the exception of clearing in the MEZ, other than the approved portal and other infrastructure as per Figure 2 and Figure 4 of MS 756).	Clearing of no more than 3,000 ha of native vegetation within the Development Envelope of 16,834 ha. Disturbance in the defined Mesa A Mining Exclusion Zone limited to 42 ha, including mining (33 ha), widening of the existing escarpment cut (2 ha) and installation of infrastructure (7 ha). Clearing in the Mesa B and Mesa C Mining Exclusion Zones in accordance with the Environmental Management Plan.	Clearing of up to 6,680 ha within the Development Envelope of 16,834 ha. Disturbance in the Mesa A Mining Exclusion Zone limited to that for the portal and other infrastructure as approved under MS 756 plus additional disturbance limited to 42 ha, including mining (33 ha), widening of the escarpment cut (2 ha) and installation of infrastructure (7 ha). Clearing in the Mesa B and Mesa C Mining Exclusion Zones in accordance with the Environmental Management Plan.
Mining depth	Figure ES 3	Above water table.	Above water table at Mesa A, Mesa B and Highway/Tod Bore. Above and below water table at Warramboo and Mesa C.	Above water table at Mesa A, Mesa B, and Highway/Tod Bore. Above and below water table at Warramboo and Mesa C.
Operational elements				
Water supply and Warramboo dewatering	Figure ES 3	3 gigalitres per annum (GL/a) (licensed under <i>Rights in Water and</i> <i>Irrigation Act 1914</i>)	Abstraction of no more than 15 GL/a (including the current licensed abstraction of 3 GL/a) of groundwater from the Warramboo dewatering (excludes surface water inflow due to rainfall events) and water supply borefield.	Abstraction of no more than 15 GL/a of groundwater from the Warramboo dewatering (excludes surface water inflow due to rainfall events) and water supply borefield.

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Element	Location	Existing approval (Ministerial Statement/s and other regulatory approvals)	Proposed Change	Proposed extent (Mesa A Hub Revised Proposal)
Mesa C dewatering	Figure ES 3	-	Abstraction of no more than 5 GL/a of groundwater from the Mesa C Channel Iron Deposit (CID) aquifer (excludes surface water inflow due to rainfall events).	Abstraction of no more than 5 GL/a of groundwater from the Mesa C CID Aquifer (excludes surface water inflow due to rainfall events).
Surplus water management	Figure ES 3	-	Use on-site, in processing, passive recharge via completed mine pits, and controlled surface discharge to Warramboo Creek. Controlled surface discharge from the Proposed Change to extend along Warramboo Creek no further than 8 km downstream of the discharge point under natural no-flow conditions.	Use on-site, in processing, passive recharge via completed mine pits, and controlled surface discharge to Warramboo Creek. Controlled surface discharge from the Revised Proposal to extend along Warramboo Creek no further than 8 km downstream of the discharge point under natural no-flow conditions.
Ore processing (waste)	Figure ES 3	-	In-pit disposal of waste fines at Warramboo.	In-pit disposal of waste fines at Warramboo.

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Table ES 3: Summary of potential impacts, proposed mitigation and outcomes

Flora and Vegetation	
EPA Objective	To protect flora and vegetation so that biological diversity and ecological integrity are maintained.
Policy and guidance	 EPA policy and guidance EPA Cumulative environmental impacts of development in the Pilbara region: Advice of the Environmental Protection Authority to the Minister for Environment under Section 16(e) of the Environmental Protection Act 1986 (2014) Department of Mines and Petroleum and EPA Guidelines for Preparing Mine Closure Plans (2015) EPA Statement of Environmental Principles, Factors and Objectives (2016) EPA Environmental Factor Guideline: Flora and Vegetation (2016) EPA Environmental Factor Guideline - Inland Waters Environmental Quality (2016) EPA Technical Guidance: Flora and Vegetation Surveys for Environmental Impact Assessment (2016) EPA Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (2016). Other policy and guidance WA Environmental Offsets Policy (2011) WA Environmental Offsets Guidelines (2014).
Potential impacts	 Direct impacts Loss of vegetation due to clearing Loss of conservation significant flora due to clearing. Indirect impacts Loss or degradation of riparian vegetation as a result of groundwater drawdown Loss or degradation of riparian vegetation as a result of surface water discharge Degradation of vegetation due to ingress of weeds Degradation of vegetation due to increased dust deposition.
Mitigation	 Avoid: The Proposed Change has been designed to avoid direct disturbance to the Sand Sheet PEC (excluding impacts within the buffer) The Proposed Change has been designed to avoid known locations of Priority Flora as far as practicable

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- Clearing will only occur in approved ground disturbance areas
- Strict hygiene procedures will be implemented to prevent introduction of new or additional populations of weed species into the Development Envelope.

Minimise:

- The clearing footprint has been reduced to the smallest practicable through project optimisation to reduce the extent of clearing required
- Abstracted groundwater will be used on-site for processing and dust suppression to reduce the need for discharge. Hydrogeological modelling has been and will continue to be undertaken to facilitate understanding of current and future abstraction requirements
- Groundwater abstraction will remain within licence limits and will be minimised to that required to access the below water table resource and meet
 water supply requirements
- The Melaleuca argentea dominated communities and the Melaleuca argentea and Eucalyptus camaldulensis co-dominated community along the Robe River and the Eucalyptus camaldulensis dominated community along Warramboo Creek will be monitored to ensure no irreversible impacts to the health of riparian vegetation occur as a result of dewatering. If required, appropriate mitigation measures will be implemented in accordance with the EMP
- Surplus water will be discharged at a rate that is not expected to cause bank erosion
- Riparian vegetation within the discharge extent will be monitored to ensure there are no irreversible impacts to riparian vegetation health as a result
 of surplus water discharge. If required, appropriate mitigation measures will be implemented in accordance with the EMP
- Weed control will be undertaken annually in the Development Envelope to minimise weed infestations
- The Sand Sheet PEC will continue to be monitored to provide an indication of vegetation condition, community structure and diversity. If required, appropriate mitigation measures will be implemented in accordance with the EMP
- The proposed haul road and construction haul road have been designed such that they are located as far from the Sand Sheet PEC as practicable
 to reduce potential for impacts of dust on the Sand Sheet PEC
- The Proponent will implement dust controls including water sprays, dust suppressants and other measures to minimise the extent of dust deposition on vegetation.

Rehabilitate:

- Disturbed areas will be rehabilitated to create a safe, stable and non-polluting landscape revegetated with native species, to maximise environmental and cultural heritage outcomes and ensure the site does not adversely impact on the current surrounding land use.
- The conditions of the new Ministerial Statement for the Revised Proposal shall require the Proponent to implement a Closure Plan in accordance with the DMP/EPA Guidelines for Preparing Mine Closure Plans. Indicative completion criteria include:
 - Seed used in rehabilitation works is of local provenance (except where seed pre-dates accurate recording of area)
 - Native plants within rehabilitated areas are observed to flower and/or fruit
 - Recruitment of native perennial plants is observed

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Species richness of native perennial plants within rehabilitated areas is not less than reference sites Any weed species recorded within rehabilitation areas are present within the local area Erosion from landforms does not threaten surrounding significant natural ecosystems. Residual Impact: The Proposed Change is expected to result in the unavoidable loss of up to 3,000 ha of vegetation. No disturbance will occur to the Sand Sheet PEC. Disturbance to five vegetation units of high local significance; ChAbAtrTw, EcEvMgAtrCv, AanAbAsyTP, AanAiAatAbTP and CcAanTe will be limited to between 1%-9% of the extent of each of these vegetation types in the western portion of the Development Envelope and disturbance of individuals of the four Priority Flora species will be limited to between 1% - 5% of records in the Rio Tinto database. The Proposed Change involves clearing of 8 ha of riparian vegetation along Warramboo Creek to facilitate installation of the surplus water discharge point. Drawdown of the Mesa C CID aguifer is not expected to result in observable changes to groundwater levels within the Robe River Alluvial Aquifer. Potential indirect impacts from dewatering and surface water discharge into Warramboo Creek may occur, however; no irreversible impact on riparian vegetation is anticipated. Although there may be impacts to the riparian vegetation along Warramboo Creek from both drawdown and **Outcomes** discharge, the low flow channel and alluvial substrate will remain and the functionality of the community is expected to be maintained. Ongoing monitoring of key environmental values along the affected areas of Warramboo Creek will be undertaken to ensure that no unforeseen impacts occur. The Proponent considers that the residual impact from the direct clearing of up to 3,000 ha of native vegetation in Good to Excellent condition, including approximately 8 ha of riparian vegetation is significant and warrants an offset. After the mitigation hierarchy has been applied, including avoidance and minimisation of direct impacts to key flora and vegetation values and the proposed offset, the Proponent considers that the Proposed Change can be managed to meet the EPA's objective for Flora and Vegetation. The proposed loss of vegetation is not expected to cause a loss of biological diversity at the local or regional scale and the ecological integrity of the area surrounding the footprint is expected to be maintained. Offset: The Proponent proposes the provision of an environmental offset (\$750 per hectare) for the unavoidable clearing of native vegetation in Good to Excellent condition, and an environmental offset at the higher offset rate (\$1,500 per hectare) for the unavoidable clearing of riparian vegetation. Subterranean Fauna **EPA Objective** To protect subterranean fauna so that biological diversity and ecological integrity are maintained. **EPA Policy and guidance** DMP and EPA Guidelines for Preparing Mine Closure Plans (2015) Policy and guidance EPA Statement of Environmental Principles, Factors and Objectives (2016) EPA Environmental Factor Guideline: Subterranean Fauna (2016)

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	 EPA Environmental Factor Guideline – Inland Waters Environmental Quality (2016) EPA Technical Guidance: Sampling methods for Subterranean fauna (the content of this Guidance has not yet been updated from EPA Guidance Statement No. 54a: technical appendix to Guidance Statement No. 54) (2016) EPA Technical Guidance: Subterranean fauna survey (2016) (the content of this Guidance has not yet been updated from EPA Guideline 12. Issued June 2013) EPA Instructions on how to prepare an Environmental Review Document (2016) EPA Instruction of how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (2016).
	Other policy and guidance
	 WA Environmental Offsets Policy (2011) WA Environmental Offsets Guidelines (2014).
Troglofauna	
Potential impacts	 Direct impacts Reduction in troglofauna habitat due to mine pit development Loss of individuals and changes to assemblages due to mine pit development. Indirect impacts Clearing of vegetation and placement of mineral waste potentially leading to a reduction in organic inputs into the subterranean environment. Reduced organic inputs may diminish the quality of troglofauna habitat Seepage from the WFSF will generate a saturated zone above the groundwater table, resulting in a temporary reduction in troglofauna habitat Blasting may cause voids within the remnant mesa formations to collapse, resulting in a reduction in troglofauna habitat Exposure of pit faces may cause changes to the temperature and humidity in the subterranean environment, potentially leading to degradation of troglofauna habitat Hydrocarbon spills may result in a reduction in the quality of troglofauna habitat.
Mitigation	 Avoid: Single location and singleton troglofauna will be avoided as far as practicable and their ongoing avoidance will be ensured by the retention of a MEZ Hydrocarbon storage and servicing and re-fuelling of plant and vehicles will not occur within the MEZs at Mesas A, B and C. Minimise: The mine plan has been designed to retain at least 50% by volume of connected pre-mining troglofauna habitat at Mesas A, B and C by delineation
	of a MEZ (and pit floor in the case of Mesa A).

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- Clearing within the MEZs at Mesas A, B and C will be minimised and limited to infrastructure such as tracks, utilities, telecommunications, monitoring stations and abandonment bunds.
- Mineral waste dumps required as part of the Proposed Change will be located either in-pit or off the mesa in order to minimise clearing in the MEZ.
- The conditions of the new Ministerial Statement for the Revised Proposal shall require the Proponent to implement an EMP to ensure suitable troglofauna habitat is retained.
- Troglofauna sampling will be conducted in the Warramboo and Highway/Tod Bore area and in the MEZs at Mesas A, B and C to verify persistence of troglofauna.

Rehabilitate:

- Pits will be backfilled with waste rock material where mine schedules allow and subterranean temperature and humidity at Mesa A will continue to be monitored.
- The conditions of the new Ministerial Statement for the Revised Proposal shall require the Proponent to implement a Closure Plan in accordance with the DMP/EPA Guidelines for Preparing Mine Closure Plans.
- The Closure Plan includes a closure objective to ensure that final landform is stable and considers ecological values and that vegetation is self-sustaining. Progressive rehabilitation will be undertaken which will assist in re-establishing nutrient flows into the subterranean environment.

Residual Impact:

At least 50% by volume of connected pre-mining troglofauna habitat will be retained at Mesas A, B and C by delineation of a MEZ (and pit floor in the case of Mesa A). The mine plans for Mesas A, B and C have also been designed to avoid as many single location and singleton troglofauna as practicable and ensure their ongoing avoidance by the retention of the MEZ.

The troglofauna habitat present within each deposit is well connected and extends beyond the proposed impact areas. Monitoring evidence also indicates that the Mesa A MEZ is functioning as intended, in protecting the ecological integrity of troglofauna habitat and assemblages. The proposed mitigation strategies, including the continuation of the MEZ approach adopted at Mesa A, will ensure the proposed mining at each deposit can be conducted such that the ecological integrity of troglofauna habitat, as well as the diversity and ecological integrity of the troglofauna assemblages present are unlikely to be impacted significantly.

After the mitigation hierarchy has been applied, including retention of connected habitat through designation of a MEZ, the Proponent considers that the residual impact associated with the unavoidable clearing of the Priority 1 PECs is significant for the Troglofauna component of the Subterranean Fauna factor and warrants an offset. Given the proposed mitigation and offset, the Proponent considers that the Proposed Change can be managed to meet the EPA's objective for Subterranean Fauna.

Offset:

Outcomes

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	The Proponent proposes the provision of an environmental offset at the higher offset rate (\$1,500 per hectare) for the unavoidable clearing of areas with other environmental values: Priority Ecological Communities (the Subterranean invertebrate community of mesas in the Robe Valley region and the Subterranean invertebrate community of pisolitic hills in the Pilbara).
Stygofauna	
Potential impacts	 Direct impacts Reduction in stygofauna habitat due to below water table pit excavation at Warramboo and Mesa C (physical removal of habitat) Reduction in stygofauna habitat due to groundwater abstraction resulting in groundwater drawdown at Warramboo and Mesa C Loss of individuals and changes to assemblages due to groundwater abstraction and below water table mining at Warramboo and Mesa C. Indirect impacts Seepage from in-pit disposal of waste fines and reverse osmosis effluent which has the potential to change groundwater chemistry and degrade stygofauna habitat Hydrocarbon and wastewater spills which may result in a reduction in the quality of stygofauna habitat.
Mitigation	Avoid: Additional water requirements will be sourced from an extension to the existing Warramboo borefield, avoiding the requirement for a new borefield impact area. Placing waste fines in-pit at Warramboo avoids the need to disturb a previously undisturbed area. Minimise: Dewatering will be minimised to that required to access the below water table resource. Water from mine dewatering will be used on-site where possible to minimise the requirement for additional groundwater abstraction for operational water supply. The Proponent will abstract groundwater within the licence limits and monitor groundwater levels to ensure impact remains within the predicted range of drawdown. If required, appropriate mitigation measures will be implemented in accordance with the EMP. Hydrocarbons will be handled, stored and disposed of in accordance with legal requirements. Hydrocarbon storage will be inspected on a regular basis to identify any maintenance requirements. Spill response procedures will be followed to contain and clean-up any hydrocarbon spills. Rehabilitation: BWT pits will be backfilled and/or used for storage of waste fines material enabling recovery of groundwater levels and stygofauna habitats following cessation of groundwater abstraction. Hydrocarbon storage and handling facilities will be decommissioned at closure.

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	Residual impact:
	The Proposed Change will result in some impacts to stygofauna habitat and communities; it is unlikely the stygofauna habitat or stygofauna assemblages will be significantly impacted primarily due to the habitat present within each deposit being well connected and extending beyond the proposed impact areas.
	At Warramboo, a small proportion of available habitat will be impacted by the proposed groundwater drawdown and pit excavation and there is a lack of potential barriers to dispersal of stygofauna to the west and north of the area. It is therefore considered that although the Proposed Change will result in the loss of individuals, it is unlikely to significantly affect the ecological integrity of the stygofauna habitat or the diversity and ecological integrity of the stygofauna assemblages in the Warramboo area.
Outcomes	At Mesa C, very little of the deposit is below the water table (5%) and therefore suitable as stygofauna habitat. Studies indicate the Mesa C CID Aquifer is seasonally connected to the extensive stygofauna habitat present in the adjacent Robe River Alluvial Aquifer. Given the extent and connectivity with other primary habitats, such as the Robe River Alluvial Aquifer which is not expected to be impacted by the Proposed Change, it is considered that although the Proposed Change will result in the loss of individuals, it is unlikely to significantly affect the ecological integrity of stygofauna.
	After the mitigation hierarchy has been applied, including consideration of extensive, connected stygofauna habitat at Warramboo and Mesa C, the Proponent considers that the potential impacts can be managed to meet the EPA's objective for Subterranean Fauna.
	Offset:
	The Proponent considers that the potential impacts can be managed for stygofauna as a component of the Subterranean Fauna factor and the residual impact will not be significant enough to warrant application of offsets.
Terrestrial Fauna	
EPA Objective	To protect Terrestrial Fauna so that biological diversity and ecological integrity are maintained.
Policy and guidance	 EPA policy and guidance DMP and EPA Guidelines for Preparing Mine Closure Plans (2015) EPA Environmental Factor Guideline: Terrestrial Fauna (2016) EPA Statement of Environmental Principles, Factors and Objectives (2016) EPA Technical Guidance: Sampling methods for terrestrial vertebrate fauna (the content in this Technical Guidance has not yet been updated from the technical structure of the EPA and the then Department of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of the EPA and the then Department of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of Environment and Conservation issued in Sentember 2010 and titled 'Technical Guidance's principles of Environment and Conservation issued in Sentember 2010 and the Environment and Conservation issued in Sentember 2010 and the Environment and Conservation issued in Sentember 2010 and the Environment and Conservation issued in S
	the technical report of the EPA and the then Department of Environment and Conservation issued in September 2010 and titled 'Technical Guide – Terrestrial Vertebrate Fauna Surveys for Environmental Impact Assessment') (2016)

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	 EPA Technical Guidance: Terrestrial Fauna Surveys (the content in this Technical Guidance has not yet been updated from EPA Guidance Statement No. 56 issued in June 2004) (2016) EPA Technical Guidance: Sampling of short range endemic invertebrate fauna (the content in this Technical Guidance has not yet been updated from EPA Guidance Statement No. 20 issued in May 2009) (2016) EPA Environmental Factor Guideline: Inland Waters Environmental Quality (2016) EPA Instructions on how to prepare an Environmental Review Document (2016) EPA Instruction of how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (2016).
	 Other policy and guidance WA Environmental Offsets Policy (2011) WA Environmental Offsets Guidelines (2014) Department of the Environment, Water, Heritage and the Arts, Survey guidelines for Australia's Threatened Bats (2010) Department of Sustainability, Environment, Water, Population and Communities Survey guidelines for Australia's threatened mammals (2011) Department of Sustainability, Environment, Water, Population and Communities, Survey guidelines for Australia's threatened reptiles (2011) Australian and New Zealand Environment and Conservation Council and Agriculture and Resource Management Council of Australia and New Zealand: Australian Water Quality Guidelines for Fresh and Marine Waters (2000).
Potential impacts	 Direct impacts Loss and/or fragmentation of fauna habitat including breeding, foraging and dispersal habitat due to clearing Loss of individuals from increased vehicle strikes and collisions with fencing. Indirect impacts Alteration of fauna habitat due to altered hydrology arising from groundwater abstraction and increased temporal availability of surface water from discharge of surplus water Loss or degradation of habitat due to noise and vibration Degradation of habitat due to dust and light emissions Degradation of habitat due to altered fire regime, introduction or spread of weeds and changes to feral animal populations Degradation of aquatic fauna habitat due to changes to water chemistry arising from discharge of surplus water.
Mitigation	Avoid: The Proposed Change has been designed to avoid disturbance to Breakaways and Gullies habitat except where escarpment cuts are required to access the mesas (8 ha) The Proposed Change will avoid direct impacts to all recorded potential diurnal/maternal Ghost Bat roosts

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- The Proposed Change will avoid direct disturbance to all but one known nocturnal Ghost Bat roost (one of the 24 caves/shelters recorded in the western portion of the Development Envelope as being used by Ghost Bats)
- The use of barbed wire will be avoided except where legislated
- The surplus water discharge point will be installed in Major River/Creek habitat of Warramboo Creek, not considered to be of significant value to conservation significant aquatic fauna
- Lighting will be directed into the active pits to avoid the mesa escarpments.

Minimise:

- The clearing footprint has been minimised through project optimisation to reduce the extent of clearing required. Specifically, in-pit disposal of waste fines and reverse osmosis plant effluent is proposed rather than development of an external tailings storage facility and evaporation pond
- The Proponent proposes to undertake annual monitoring of Northern Quoll within the Development Envelope. If required, appropriate mitigation measures will be implemented in accordance with the EMP.
- The Proponent will abstract groundwater within the licence limits and monitor groundwater levels, responding appropriately, to ensure the extent of groundwater drawdown remains within the predicted range of impact.
- Surplus groundwater will be utilised on-site for mine operations and processing, where practicable. Surplus water will only be discharged when supply exceeds demand for the duration of abstraction activities only
- The MEZ around Ghost Bat roosts will minimise the potential impact of noise and vibration on roosting Ghost Bats and a Blast Management Framework will be implemented to limit vibration emissions
- Monitoring of Ghost Bat roosts will include blast vibration monitoring for all blasts within 300 metres of the potential diurnal/maternal Ghost Bat
 roosts, and bi-annual collection and analysis (genetic and hormone) of scat samples from across the broader Robe Valley as part of the five year
 Ghost Bat study
- Lighting will be installed only where required, that is, mainly in-pit and operational areas
- Dust emissions will be managed through application of dust suppression methods including water sprays, where applicable
- The Proponent has well established strategies for monitoring and management of the risk of weed ingress, feral animals and increase in fire at its Pilbara operations that will be implemented in the Development Envelope to manage these aspects.

Rehabilitate:

• The conditions of the new Ministerial Statement for the Revised Proposal shall require the Proponent to implement a Closure Plan in accordance with the DMP/EPA Guidelines for Preparing Mine Closure Plans.

Outcomes

Residual Impact:

The Proposed Change will result in the unavoidable loss of fauna habitat (including habitats for conservation significant fauna species) as a result of clearing. None of the habitats recorded are restricted to the Development Envelope; all fauna habitats identified from the Development Envelope occur throughout the Robe Valley. The most significant habitat types in the Development Envelope are the Breakaways and Gullies habitat and Major

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River/Creek habitat which include habitat for Northern Quoll, Pilbara Leaf-nosed Bat, Ghost Bat, Pilbara Olive Python, SREs and aquatic fauna species. Disturbance of the extent of Breakaways and Gullies habitat type present in the western portion of the Development Envelope will be limited to 6%, and disturbance of the extent of Major River/Creek habitat type in the western portion of the Development Envelope will be limited to 1%. There will be no direct disturbance to recorded potential diurnal/maternal Ghost Bat roosts. One recorded nocturnal Ghost Bat roost will be disturbed.

The Proposed Change is not considered likely to result in significant impacts to local populations of conservation significant species, or affect the conservation status of species (including SREs and species of elevated conservation significance) given the retention of key habitat features and minimal impact to key habitat types.

Groundwater abstraction for the Proposed Change is not predicted to result in significant changes to understorey vegetation (fauna habitat) along the majority of the defined flow channel of Warramboo Creek. Discharge of surplus water for the Proposed Change is not predicted to result in significant impacts to Major River/Creek habitat in Warramboo Creek as any potential impacts will be temporary and are expected to be limited to approximately 8 km from the point of discharge.

The Proponent considers that the potential for loss of individuals from increased vehicle strikes and collisions with fencing as well as all potential indirect impacts (noise, vibration, dust, light, altered fire regime, introduction or spread of weeds and changes to feral animal populations) can be managed such that they are unlikely to result in a significant impact to fauna.

After the mitigation hierarchy has been applied, including avoidance of direct impacts to key habitat and key habitat features, the Proponent considers that the Proposed Change can be managed to meet the EPA's objective for Terrestrial Fauna; the proposed loss of habitat is not expected to cause a loss of biological diversity at the local or regional scale and the ecological integrity of the area surrounding the footprint is expected to be maintained.

Offset:

The Proponent considers that the Proposed Change is unlikely to have a significant residual impact on terrestrial fauna and therefore offsets for Terrestrial Fauna values are not proposed.

Hydrological Processes and Inland Waters Environmental Quality

EPA Objective

- To maintain the hydrological regimes of groundwater and surface water so that environmental values are protected.
- To maintain the quality of groundwater and surface water so that environmental values are protected.

EPA Policy and Guidance

Policy and guidance

- DMP and EPA Guidelines for Preparing Mine Closure Plans (2015)
- EPA Environmental Factor Guideline Hydrological Processes (2016)
- EPA Environmental Factor Guideline Inland Waters Environmental Quality (2016)
- EPA Inland Waters of the Pilbara Western Australia (Part 1) (1989)

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	 EPA Inland Waters of the Pilbara Western Australia (Part 2) (1989) EPA Statement of Environmental Principles, Factors and Objectives (2016) EPA Instructions on how to prepare an Environmental Review Document (2016) EPA Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (2016).
	 Other policy and guidance WA Environmental Offsets Policy (2011) WA Environmental Offsets Guidelines (2014) Australian Water Quality Guidelines for Fresh and Marine Waters. (2000) State Water Quality Management Strategy Document No.6. Implementation Framework for Western Australia for the Australian and New Zealand Guidelines for Fresh and Marine Water Quality and Water Quality Monitoring and Reporting (2001) Pilbara Water in Mining Guideline. Report No 34 (2009) Western Australian Water in Mining Guideline. Report No 12 (2013) WRC Statewide Policy No 5 - Environmental Water Provisions Policy for Western Australia (2000) Water Quality Protection Guidelines No. 1 to 11 and Water Quality Protection Note 22 (2000; 2008) Strategic policy 2.09: Use of mine dewatering surplus (2013).
Potential impacts	Changes to groundwater levels as a result of groundwater abstraction Changes to the hydrological regime of Warramboo Creek as a result of surplus water management. Indirect
	Changes to surface and groundwater chemistry in Warramboo Creek and the Yarraloola Aquifer as a result of in-pit storage of waste fines, disposal of effluent from the reverse osmosis plant, surface water flows through operational areas and surplus water management.
Mitigation	 Avoid: Mine design will avoid exposure of potentially acid forming material (PAF) During operations seepage from in-pit storage of waste fines and disposal of effluent from the reverse osmosis plant will mostly be captured by the water supply borefield and re-circulated in the wet plant. Minimise:
	 Hydrogeological modelling has been, and will continue to be, undertaken to facilitate understanding of current and future dewatering and water supply requirements to inform optimisation of groundwater abstraction to reduce impacts. Abstraction will be minimised to that required to access the below water table resources and meet site water requirements.

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- Monitoring of riparian vegetation and groundwater levels will be undertaken along the Robe River adjacent to the predicted drawdown within the Mesa C CID Aquifer. If changes to groundwater levels and vegetation health are detected, then appropriate mitigation measures will be determined in accordance with the EMP.
- Groundwater levels in the Warramboo borefield will be monitored to check that drawdown is occurring consistent with modelled predictions.
- Dewatering water will be utilised on-site in the first instance to supply water for operational purposes. Only surplus water exceeding the operational requirement will be discharged to Warramboo Creek.
- Monitoring of the location of the continuous surface water expression in Warramboo Creek under natural no-flow conditions, including surface water chemistry will be undertaken. If required, appropriate mitigation measures will be implemented in accordance with the EMP.
- Hydrocarbons will be handled, stored and disposed of in accordance with legal requirements.
- Hydrocarbon storage facilities and all associated connections will be within appropriately contained areas and storm water will be collected from these areas and treated to remove hydrocarbons prior to discharge.
- Hydrocarbon storage facilities and bunds will be inspected on a regular basis to identify any leaks or maintenance requirements.
- The Proponent has well established management strategies for the management of PAF materials, While the likelihood of encountering significant quantities of PAF material is considered low; if PAF materials are encountered then existing management strategies within the Rio Tinto Iron Ore (WA) Mineral Waste Management Plan, and the Spontaneous Combustion and ARD (SCARD) Management Plan will be implemented to ensure waste material is adequately geochemically characterised and PAF material that poses an Acid Mine Drainage risk is appropriately managed.
- Water management structures such as windrows around the base of waste dumps and sediment traps will be constructed in key areas to minimise discharge of sediment-laden run-off from the site.

Rehabilitate:

- The conditions of the new Ministerial Statement for the Revised Proposal shall require the Proponent to implement a Closure Plan in accordance with the DMP/EPA Guidelines for Preparing Mine Closure Plans.
- Mine pits will be backfilled to appropriate levels to prevent the formation of pit lakes.

Residual Impact:

The Proposed Change will result in unavoidable groundwater drawdown as a result of dewatering below water table resources and supplying water for processing requirements.

Groundwater drawdown from dewatering at Mesa C is not expected to extend beyond the CID Aquifer. No observable changes are expected to surface water levels or surface water chemistry in the Robe River, groundwater levels in the Robe River Alluvial Aquifer, or surface water levels in the semi-permanent pools near Mesa B. Groundwater abstraction for dewatering and water supply from the Warramboo borefield will lower the groundwater table by up to 36 m and recovery of the groundwater table to 80% of pre-mining groundwater level will take approximately 40 years, with complete recovery of the groundwater level estimated to take up to 140 years. The 13 km section of the defined flow channel of Warramboo Creek within the

Outcomes

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estimated cone of depression of the Warramboo borefield extension will not be affected given the ephemeral nature of the creek and lack of permanent or semi-permanent pools identified in this section of the creek.

Surplus water discharge will alter the seasonal occurrence of surface water in Warramboo Creek by increasing water availability up to 8 km downstream of the discharge point. No erosion is expected, however a temporary decline in vegetation health and localised impacts to fauna species may result along the extent of discharge due to alteration of surface water chemistry and sediment quality.

No significant impacts to surface and groundwater quality are expected from hydrocarbons or PAF.

After the mitigation hierarchy has been applied, no significant residual impact to hydrological processes and inland waters environmental quality values is anticipated and the Proponent considers that the Proposed Change can be managed to meet the EPA's objectives for these factors.

Offset:

The Proponent considers that the Proposed Change is unlikely to have a significant residual impact on hydrological processes and inland waters environmental quality and therefore offsets for these values are not proposed.

EPA Objective The EPA objective for landforms is to maintain the variety and integrity of distinctive physical landforms so that environmental values are protected. EPA policy and guidance EPA Environmental Factor Guideline - Inland Waters Environmental Quality (2016) EPA Environmental Factor Guideline: Landforms (2016) EPA Statement of Environmental Principles, Factors and Objectives (2016) DMP and EPA Guidelines for Preparing Mine Closure Plans (2015) EPA Instructions on how to prepare an Environmental Review Document (2016) EPA Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (2016). Other policy and guidance WA Environmental Offsets Policy (2011) WA Environmental Offsets Guidelines (2014)

WAPC Visual Landscape Planning in Western Australia a manual for evaluation, assessment, siting and design (2007).

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	Divert importat
	Direct impacts:
	 Loss of variety due to removal or degradation of the mesa landforms Loss of the integrity of the mesa landforms due to disturbance.
Potential impacts	
	Indirect impacts
	 Loss or degradation of the ecological values of the mesa landforms Loss or degradation of the social values of the mesa landforms through loss of indigenous heritage and amenity values.
	Loss of degradation of the social values of the mesa fandioms through loss of indigenous heritage and amenity values.
	Avoid:
	Sections of the escarpments with the highest ecological value; the locations and designs of the escarpment cuts for both Mesas B and C were selected to avoid disturbance to these areas
	Potential loss of integrity of the mesa escarpments will be avoided by retaining an escarpment width of at least 30 metres at the top surface.
	Direct impacts to potential diurnal/maternal Ghost Bat roosts at Mesas B and C will be avoided and direct impacts to all but one of the recorded nocturnal Ghost Bat roosts on Mesas A, B and C will be avoided.
	• Retention of the mesa escarpments will avoid impact to significant heritage sites located in the escarpments as well as reducing impacts to visual amenity of the landscape.
	No direct disturbance to rock shelters is proposed, including the rock shelter site on Mesa B with spinifex matting.
	Minimise:
Mitigation	The most prominent feature of the mesas, the escarpments, will be retained excluding minor access cuts.
······gatio	The widths required for the access cuts into the mesa escarpments have been minimised as far as possible.
	The Proposed Change has been designed to retain connected troglofauna habitat of at least 50% of the pre-mining habitat volume on each mesa.
	The implementation of the Blast Management Framework (including management of potential for flyrock) and retention of escarpments with an
	adequate width will minimise any potential impacts to the ecological value of the mesa escarpments, including the caves and rock shelters present on the mesa escarpment.
	The location and layout of the mine and associated infrastructure has been designed to minimise impacts to Aboriginal heritage sites. Where
	impacts to heritage sites cannot be avoided, applications will be made under Section 18 of the <i>Aboriginal Heritage Act 1972</i> in consultation with the Kuruma Marthudunera People.
	Waste dumps near Mesas B and C will remain lower than the surrounding mesas.
	Rehabilitate:
	All disturbed surfaces will be rehabilitated including pit floors to maximise the ecological value

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	Visual impacts will be further minimised through construction of the waste dumps to be aesthetically compatible with the surrounding landscape and through rehabilitation of the waste dumps.		
	Residual Impact:		
	The retention of the escarpments of the mesas, excluding access cuts, will, to a large extent, preserve the prominence and scale of the mesas in the landscape, and therefore the Proposed Change will retain the representation or 'variety' of Robe Pisolite mesas in the Robe Valley. The Warramboo and Highway/Tod Bore deposits are not associated with any elevated landforms and therefore no significant landform values will be affected by the Proposed Change in these areas.		
Outcomes	Given the most valuable feature of the mesa landform will remain largely intact and the structural integrity of the landform will be maintained through retention of an adequate escarpment width, it is considered the proposed loss of small proportions of the mesa escarpments is not expected to significantly impact the variety, integrity, ecological or social values of the landforms at a local or regional scale.		
	After the mitigation hierarchy has been applied, including avoidance of direct disturbance to the majority of the mesa escarpments, including heritage and ecological values, the Proponent considers that the Proposed Change can be managed to meet the EPA's objective for Landforms.		
	Offset:		
	The Proponent considers that the Proposed Change is unlikely to have a significant residual impact on landforms and therefore offsets for the associated values are not proposed for this factor.		
Social Surroundings			
EPA Objective	The EPA objective for social surroundings is to protect social surroundings from significant harm.		
	EPA policy and guidance		
	DMP and EPA Guidelines for Preparing Mine Closure Plans (2015)		
	EPA Environmental Factor Guideline: Social Surroundings (2016)		
Policy and guidance	EPA Instructions on how to prepare an Environmental Review Document (2016) FDA Instructions on how to prepare Environmental Protection Act 1096 Part IV Environmental Management Plans (2016).		
	EPA Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (2016). Other policy and guidance.		
	 Other policy and guidance Department of Aboriginal Affairs and Department of Premier and Cabinet Due Diligence Guidelines, Version 3.0 (2013). 		
	• Department of Apoliginal Arians and Department of Fremier and Capinet Due Diligence Guidelines, Version 3.0 (2013).		

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Potential impacts	 Disturbance of sites of cultural significance Prevention or change to access to a site Changes to the physical and biological attributes of the environment (e.g. pools, creeks, mesa breakaways, bush tucker and bush medicine) which would impact on sites of heritage significance The proposed intersection of the North West Coastal Highway with a mine pit.
Mitigation	 Avoid: The Proposed Change has been designed to avoid direct impacts to sites with high significance, including the Robe River, rock shelter site MBC15_36 on Mesa B with spinifex matting, Warramboo outstation, one ethnographic site and one archaeological site within the approved Warramboo pit footprint. Minimise: The Proposed Change has been designed to minimise direct impacts to Yirrkawiya Gap and escarpments on Mesas A, B and C. Further assessment of sites and salvaging of artefacts is expected to occur. Artefact salvage will ensure the retention of artefact values ex-situ. The Proponent has established an internal system for managing all ground disturbing activities to ensure compliance with heritage commitments and regulatory requirements. The Proponent is committed to consulting with the Kuruma Marthudunera People regarding the Proposed through Local Implementation Committee (LIC) meetings and heritage survey processes. Rehabilitate: The Proponent has developed a Mine Closure Plan consistent with DMP and EPA Guidelines to ensure social surrounds are rehabilitated post closure.
Outcomes	Residual Impact: No disturbance will occur to the key heritage sites of Robe River and associated pools, rock shelter site MBC15_36, Warramboo outstation, one ethnographic site and one archaeological site within the current approved Warramboo Mine footprint, the traditional birthing place and the majority of the mesa escarpments. The Proposed Change has been designed to minimise impacts to Yirrkawiya Gap and the escarpments of Mesas A, B and C. Where impacts to heritage sites cannot be avoided, applications will be made under Section 18 of the Aboriginal Heritage Act 1972 in consultation with the Kuruma Marthudunera People. The Proposed Change will result in direct disturbance to some artefact scatter sites, and may result in indirect disturbance to some rockshelter sites due to vibration. Approximately 51 Section 18 applications are anticipated. Additional surveys and mine planning are required to determine whether heritage sites at the Highway/Tod Bore deposits can be avoided. The Proponent will continue to work in close consultation with the Kuruma Marthudunera People in regards to avoidance and management of site disturbance.

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The Proposed Change will result in reduction in access to some traditional lands due to safety considerations associated with an operating mine site. There is also potential for temporary, localised changes to the availability of bush tucker and bush medicine due to abstraction of groundwater and discharge of surplus water. However, the flora and fauna that occur in the area that may be impacted occur more widely in the Robe Valley and the changes are not expected to impact any specific heritage sites.

After the mitigation hierarchy has been applied, including avoidance of impacts to the most significant heritage sites in the western portion of the Development Envelope, minimisation of disturbance to other sites and the Proponent's commitment to continuing consultation with the Kuruma Marthudunera People regarding the Proposed Change through LIC meetings and heritage survey processes; the Proponent considers that the potential impacts can be managed to meet the EPA's objective for Social Surroundings.

Offset:

The Proponent considers that the Proposed Change is unlikely to have a significant residual impact on Social Surroundings and therefore offsets for this factor are not proposed.

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TERMINOLOGY

The following terminology is used throughout this document:

- Proponent Robe River Mining Co. Pty. Ltd as manager and agent for the Robe River Iron Associates joint venture as set out in Section 1.2
- Mesa A/Warramboo Iron Ore Project the Mesa A/Warramboo Iron Ore Project as approved under Ministerial Statement 756
- Mesa A Hub Revised Proposal (the Revised Proposal) the existing Mesa
 A/Warramboo Iron Ore Project plus the proposed activities (as detailed in Section
 2) that are additional to those approved under Ministerial Statement 756,
 incorporating development of additional mine pits and associated infrastructure,
 water treatment facilities, processing facilities and water management
 infrastructure as well as extension of existing mine pits, waste dumps and
 associated infrastructure.
- Development Envelope the area encompassing the Revised Proposal, including the existing approved infrastructure corridor. The proposed activities will be undertaken in the western portion of the Development Envelope covering the mine pits, borefield and associated infrastructure. No additional disturbance is proposed within the existing infrastructure corridor approved under Ministerial Statement 756.
- Mining Exclusion Zone the area where blasting and excavation of ore will not be undertaken.

1. INTRODUCTION

1.1 Purpose and Scope

Robe River Mining Co. Pty. Ltd. (the Proponent) operates the existing Mesa A/Warramboo Iron Ore Project located approximately 43 kilometres (km) west of Pannawonica in the Pilbara region of Western Australia (Figure 1-1). The current total ore feed from the Mesa A/Warramboo Iron Ore Project is up to 25 million tonnes per annum (Mt/a). The Proponent is seeking to extend the life of the Mesa A/Warramboo Iron Ore Project through further development of the existing Mesa A and Warramboo operations and development of nearby deposits: Highway, Tod Bore, Mesa B and Mesa C. This will sustain the Mesa A/Warramboo Iron Ore Project total ore feed at up to 25 Mt/a. This sustaining Proposal is referred to as the Mesa A Hub Revised Proposal (the Revised Proposal).

The purpose of this Environmental Review Document (ERD) is to provide a report on the environmental review for the Revised Proposal to the Western Australian Environmental Protection Authority (EPA).

The scope of the ERD is to present an environmental review that addresses the requirements outlined in sections 2 to 6 of the Environmental Scoping Document (ESD), including a detailed impact assessment and description of proposed environmental management measures for the key environmental factors in accordance with the ESD prepared by the EPA (Appendix 1).

1.2 Proponent

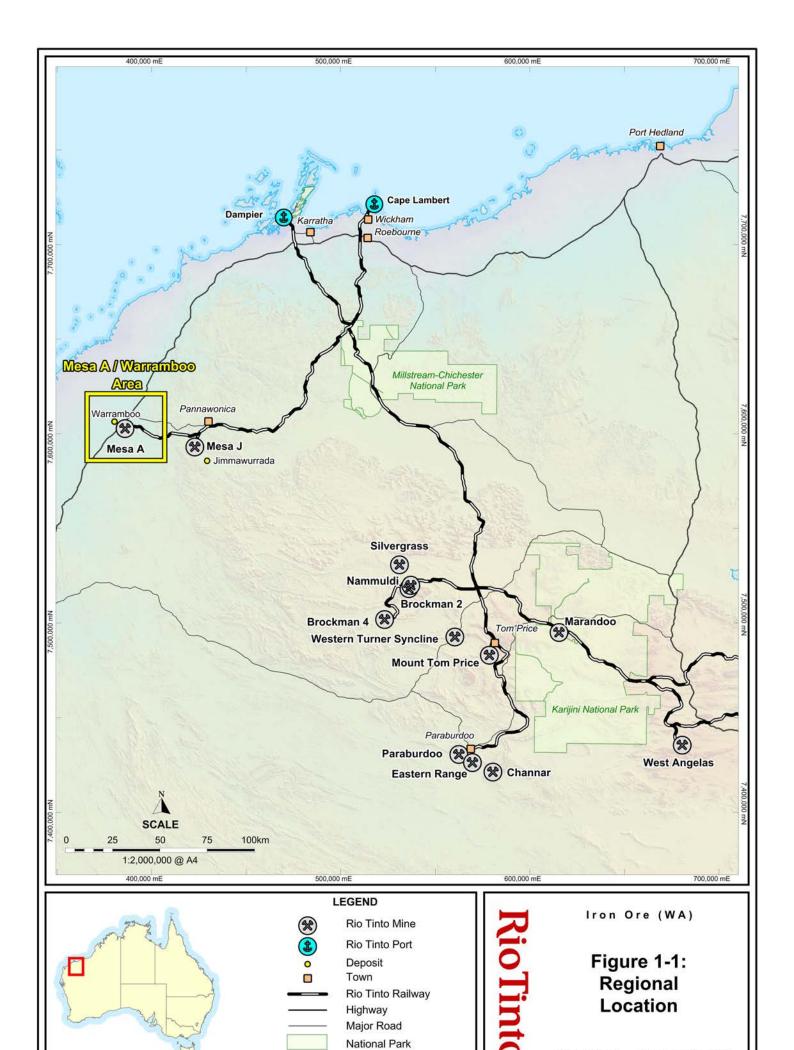
The Proponent for the Revised Proposal is Robe River Mining Co. Pty. Ltd. (ABN 71 008 694 246 / ACN 008 694 246) (a 100% owned Rio Tinto entity), which is the manager and agent for the Robe River Iron Associates joint venture. The joint venture is unincorporated and comprises the following participants:

- Robe River Mining Co. Pty. Ltd. (30 per cent share)
- North Mining Limited (35 per cent share)
- Mitsui Iron Ore Development Pty Ltd (20 per cent share)
- Pannawonica Iron Associates, a partnership carried on by Nippon Steel & Sumitomo Metal Australia Pty Ltd, Nippon Steel & Sumikin Resources Australia Pty Ltd (10 per cent share)
- Cape Lambert Iron Associates, a partnership carried on by Nippon Steel & Sumitomo Metal Australia Pty Ltd, Nippon Steel & Sumikin Resources Australia Pty Ltd and Mitsui Iron Ore Development Pty Ltd (5 per cent share).

The Rio Tinto key contact person in relation to this ERD is:

Fiona Bell
Senior advisor environmental approvals
Rio Tinto

Telephone: (08) 6213 0123 Email: fiona.bell@riotinto.com



Plan No: PDE0149312v1 Proj: MGA 94 (Zone 50)

Drawn: GIS Team Date: February, 2018

1.3 Environmental Impact Assessment Process

The EPA determined that the Proposed Change requires assessment under Part IV of the EP Act which provides for the EPA to undertake Environmental Impact Assessment of significant proposals, strategic proposals and land use planning schemes. This ERD has been prepared in accordance with the Environmental Impact Assessment (Part IV Divisions 1 and 2) Administrative Procedures 2016 (EPA 2016a) to meet the requirements of Section 40(2)(b) of the EP Act.

The Commonwealth Department of the Environment and Energy (DotEE) determined that the Proposed Change is a Controlled Action and therefore requires assessment under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act). The EPA is assessing the Proposed Change on behalf of the Commonwealth under Section 87 of the EPBC Act as an accredited assessment.

The Revised Proposal is subject to the following State Agreement: *Iron Ore (Robe River) Agreement Act 1964.* A State Agreement is a legal contract between the Western Australian Government and a proponent of a major project within the boundaries of Western Australia (WA). A State Agreement details the rights, obligations, terms and conditions for development of a specific project.

1.4 Other Approvals and Regulation

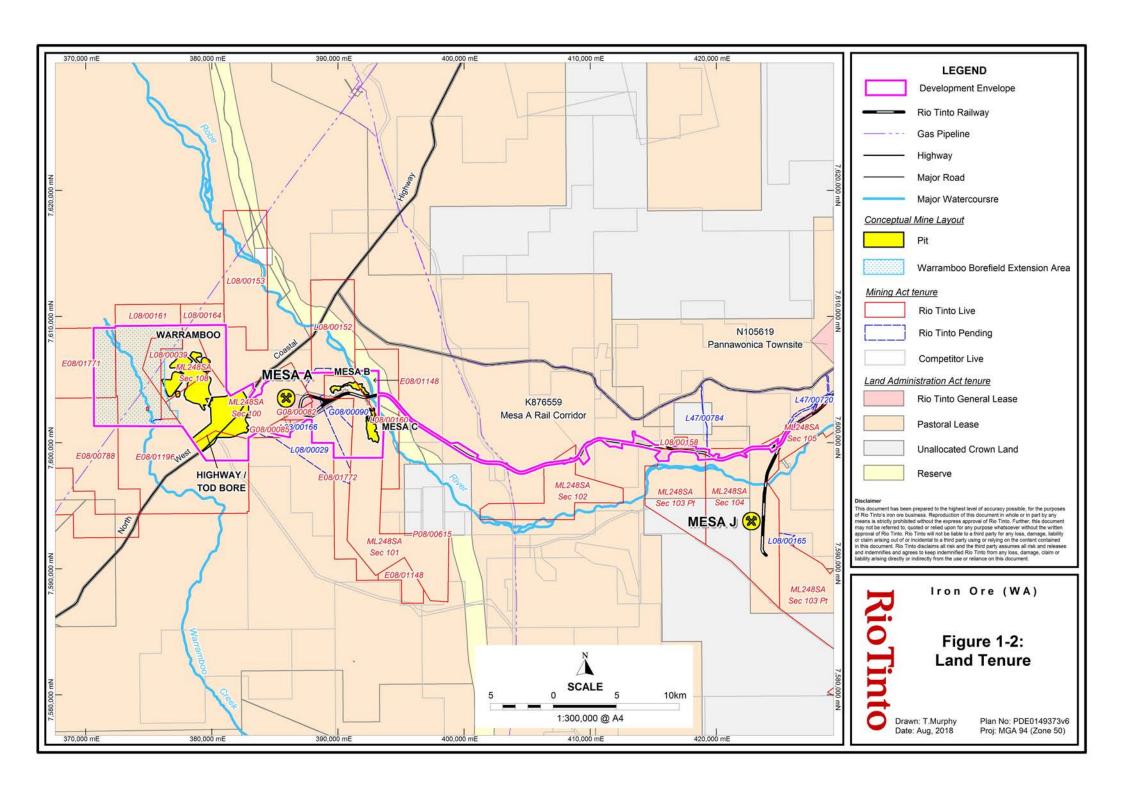
1.4.1 Land tenure

The Robe Valley mining operations, including the approved Mesa A/Warramboo Iron Ore Project, are primarily undertaken on the State Agreement Mineral Lease ML248SA granted pursuant to the *Iron Ore (Robe River) Agreement Act 1964.* ML248SA is held by Robe River Limited (a 100% owned Rio Tinto entity) and sub-leased to the Robe River Iron Associates, pursuant to Mineral Sub-lease No. 1H/79. ML248SA is considered appropriate tenure for mining and mining related infrastructure.

Existing tenure in and near the Development Envelope is shown in Figure 1-2. The deposits included in the Proposed Change are within ML248SA except for portions of the Mesas B and C deposits that extend into Exploration Licence E08/01148. Conversion of these areas into ML248SA will be required prior to development for mining.

The main co-existing Land Administration Act 1997 tenure in the Development Envelope is the Yarraloola Pastoral Station (Lease N049500). This pastoral lease is held by the Yarraloola Station Partnership which comprises members of the Robe River Iron Associates joint venture. The main ancillary tenure is the Robe River Iron Associates joint venture Land Administration Act 1997 lease for the approved Mesa A railway (Lease K876559). This lease runs between Mesas B and C and forms a tenure connection to the Mesa A mining operation.

Grant of additional tenure and/or conversion of tenure will be required for the development of *the* borefield, waste dumps, pipelines, haul roads and other infrastructure.



1.4.2 Native title

The majority of the Development Envelope lies within the Kuruma Marthudunera Native Title Claim (WC99/012). The Proponent has a Participation Agreement and an Indigenous Land Use Agreement with the Kuruma Marthudunera People that include an established consultation framework for ongoing engagement on relevant aspects of the Proponent's operations. These Agreements set obligations for processes such as land access, tenure acquisition, heritage surveys, environmental management, mining benefit payments and reporting, consultation and communication between the parties.

1.4.3 Other approvals

Other environmental approvals that will be sought as part of the Proposed Change are listed in Table 1-1.

Table 1-1: Other approvals and regulations

Proposed activity	Land tenure/access	Type of approval	Legislation regulating the activity
Clearing of native vegetation in connection with activities outside the Proposed Change (e.g. activities as indicated in Section 2.3.15)	 ML248SA (<i>Mining Act 1978</i> pursuant to the <i>Iron Ore (Robe River) Agreement Act 1964</i>) G08/00082 and G08/00085 (<i>Mining Act 1978</i>) L08/00039, L08/00152, L08/00153 (<i>Mining Act 1978</i>) K876559 (<i>Land Administration Act 1997</i>) Additional/converted tenure. 	Native Vegetation Clearing Permit	EP Act – Part V
Heritage	 ML248SA (<i>Mining Act 1978</i> pursuant to the <i>Iron Ore (Robe River) Agreement Act 1964</i>) G08/00082 and G08/00085 (<i>Mining Act 1978</i>) L08/00039, L08/00152, L08/00153 (<i>Mining Act 1978</i>) K876559 (<i>Land Administration Act 1997</i>) Additional/converted tenure. 	Section 18 consent to disturb a protected site	Aboriginal Heritage Act 1972 (AH Act)
Disturbance to bed and banks of water course	 ML248SA (<i>Mining Act 1978</i> pursuant to the <i>Iron Ore (Robe River) Agreement Act 1964</i>) G08/00082 and G08/00085 (<i>Mining Act 1978</i>) L08/00039, L08/00152, L08/00153 (<i>Mining Act 1978</i>) K876559 (<i>Land Administration Act 1997</i>) Additional/converted tenure. 	Bed and Banks permit	Rights in Water and Irrigation Act 1914

Proposed activity	Land tenure/access	Type of approval	Legislation regulating the activity
Construction of well and groundwater abstraction	 ML248SA (<i>Mining Act 1978</i> pursuant to the <i>Iron Ore (Robe River) Agreement Act 1964</i>) G08/00082 and G08/00085 (<i>Mining Act 1978</i>) L08/00039, L08/00152, L08/00153 (<i>Mining Act 1978</i>) K876559 (<i>Land Administration Act 1997</i>) Additional/converted tenure. 	Licence and Groundwater Operating Strategy	Rights in Water and Irrigation Act 1914
Construction and operation of plant, waste fines facility and waste water treatment facilities and discharge of surplus water	 ML248SA (<i>Mining Act 1978</i> pursuant to the <i>Iron Ore (Robe River) Agreement Act 1964</i>) G08/00082 and G08/00085 (<i>Mining Act 1978</i>) L08/00039, L08/00152, L08/00153 (<i>Mining Act 1978</i>) K876559 (<i>Land Administration Act 1997</i>) Additional/converted tenure. 	Works Approval and Licence	EP Act – Part V

1.4.4 Decision making authorities

Based on the other approvals identified in Table 1-1, the Proponent has revised the list of decision making authorities (DMAs) identified in the ESD and their relevance to the Revised Proposal (Table 1-2).

The Minister for Lands is listed in the ESD as a DMA. However, the Proponent considers the Minister for Lands is unlikely to be a DMA for the Revised Proposal as the Proponent is not currently planning to seek additional tenure under the *Land Administration Act* 1997. Should it become necessary to seek additional tenure under the *Land Administration Act* 1997, the Proponent would consult with the Department of Planning Lands and Heritage (DPLH).

Main Roads WA are listed in the ESD as a DMA. However, the Proponent considers Main Roads WA is unlikely to be a DMA for the Revised Proposal as changes to public roads are not proposed. The section of the North West Coastal Highway that runs through the Highway/Tod Bore deposit will require re-alignment prior to mining of these deposits. It is anticipated that separate approval for the re-alignment of the Highway will be required. Consultation and investigations to determine the most appropriate alignment will be initiated well in advance of commencement of mining of the Highway/Tod Bore deposit.

Table 1-2: Revised decision making authorities and their relevance to the Revised Proposal

Revised list of DMAs	Relevant legislation	
Minister for State Development	Iron Ore (Robe River) Agreement Act 1964	
Minister for Mines and Petroleum	Mining Act 1978	
Minister for Environment	Wildlife Conservation Act 1950 (WC Act) Environmental Protection Act 1986 (EP Act)	
Chief Executive Officer Department of Water and Environmental Regulation (DWER) (formerly the Department of Environmental Regulation and the Department of Water)	Environmental Protection Act 1986 Rights in Water and Irrigation Act 1914	
Executive Director, Environment Department of Mines, Industry Regulation and Safety (DMIRS) (formerly the Department of Mines and Petroleum [DMP])	Mining Act 1978	
State Mining Engineer DMIRS	Mines Safety and Inspection Act 1994	
Minister for Aboriginal Affairs	Aboriginal Heritage Act 1972	

2. THE REVISED PROPOSAL

2.1 Background

2.1.1 Assessment process

The Proposed Change was referred to the EPA under Section 38 of the EP Act on 21 November 2016. On 23 December 2016, the EPA determined that the Proposed Change required environmental assessment as a Revised Proposal at the level of 'Environmental Review – no public review'. The Proposed Change was also referred to the DotEE under the requirements of the EPBC Act on 12 December 2016. The DotEE determined that the Proposed Change is a Controlled Action on 8 February 2017 (EPBC 2016/7843). Following the Proposed Change being declared a Controlled Action under the EPBC Act, the EPA amended the level of assessment to 'Environmental Review – two week public review period' on 16 February 2017 to satisfy the EPBC Act public review requirements. The DotEE and EPA agreed impacts to Matters of National Environmental Significance (MNES) will be assessed by the EPA as an accredited assessment under Section 87 of the EPBC Act.

The EPA endorsed the ESD (Appendix 1) for the Mesa A Hub Revised Proposal on 16 March 2017. The ESD provides an outline of the key environmental factors, a description of the scope of the assessment of the Proposed Change and an indicative timeline for the assessment process.

Since endorsement of the ESD, refinement of the Proposed Change has occurred during the ongoing feasibility study (and more detailed technical studies undertaken). Required amendments to the Proposed Change were identified as listed in Table 2-1 and were approved under s43A of the EP Act on 9 July 2018.

Table 2-1: Amendments to the Proposed Change since referral

Proposed activity	Proposed Change as referred	Proposed Change as approved under s43A
Ground disturbance	Clearing of no more than 2,500 ha of native vegetation within a Development Envelope of 20,184 ha.	Clearing of no more than 3,000 ha of native vegetation within a Development Envelope of 16,834 ha.
Water supply and Warramboo dewatering	Abstraction of no more than 11 GL/a of groundwater from the Warramboo dewatering and water supply borefield (including the currently licensed abstraction rate of 3 GL/a).	Abstraction of no more than 15 GL/a of groundwater from the Warramboo dewatering and water supply borefield (including the current licensed abstraction rate of 3 GL/a).
Water treatment (waste)	Disposal of effluent from the reverse osmosis plant at Warramboo to an evaporation pond.	In-pit disposal of effluent from the reverse osmosis plant at Warramboo.

Should the Proposed Change be approved for implementation, the Proponent proposes that the Revised Proposal be subject to new conditions which replace those of MS 756. A draft Ministerial Statement is provided as Appendix 2. However, it is acknowledged that, the development of the final Ministerial Statement is the responsibility of the Minister.

2.1.2 Existing approval

The Mesa A/Warramboo Iron Ore Project was authorised to commence in November 2007 under Ministerial Statement 756 (MS 756); productive mining commenced at Mesa A in 2010 and at Warramboo in 2012.

The Mesa A/Warramboo Iron Ore Project (as amended1) includes:

- Above water table mining of two deposits: Mesa A and Warramboo
- Out-of-pit mineral waste dumps, low grade ore dumps, and topsoil and subsoil stockpiles
- Run of Mine pads, a crushing and screening plant, stackers, stockyards, train load-out and other materials handling infrastructure
- Support facilities including workshops, power supply infrastructure, hydrocarbon storage, explosives storage, vehicle wash-down areas, laydown areas, offices, laboratories, warehouses, potable water supply from the Warramboo borefield and waste water treatment plants
- Linear infrastructure including heavy vehicle and light vehicle access roads and railway, power and communications networks
- Infrastructure for surface water management including diversion drains and culverts.

The existing Mesa A/Warramboo Iron Ore Project includes a Mining Exclusion Zone (MEZ) across the Priority 3 Sand Sheet Vegetation (Robe Valley) Priority Ecological Community (Sand Sheet PEC) and along most of the length of the Mesa A escarpment and the south-western part of the deposit. The MEZ was established to protect the integrity of the Sand Sheet PEC, retain troglofauna habitat and protect the integrity of the mesa escarpment and its fauna habitat, landscape and heritage values. In addition to the MEZ, the Mesa A/Warramboo Iron Ore Project includes retention of a zone of troglofauna habitat beneath the pit floor (the sub-floor zone).

2.2 Justification

The Proposed Change is the only option suitable for development within the timeframe required to maintain both the type and production rate of iron ore product and efficient operation of the existing Mesa A/Warramboo Iron Ore Project. Robe Valley iron ore is supplied to many steel-producing companies in Japan, Korea and China. The unique technical properties of Robe Valley iron ore establish it as an important component of the iron ore blend in customers' blast furnace feedstock. The Revised Proposal will extend the life of the existing Mesa A/Warramboo Iron Ore Project for approximately ten years and is critical to sustain the Proponent's business activities in the region.

¹ Three amendments to the Mesa A/Warramboo Iron Ore Project have been approved under section 45C of the *Environmental Protection Act 1986* (WA) subsequent to the grant of Statement No. 756.

The Revised Proposal will result in economic benefits for Australia and Western Australia through:

- Contribution to the value of mineral exports
- Royalties and taxation payments
- Capital investment
- Increasing direct and indirect employment opportunities in the region
- Increasing demand for goods and services supporting the regional economy.

The ongoing activities of the Proponent, and more broadly Rio Tinto, in the Pilbara will continue to support social and economic development projects, including:

- Increasing the education, training, employment and business options for local people, including local Aboriginal people
- Funding a range of organisations in the region, including sporting and cultural groups.

The Revised Proposal will continue to make use of Rio Tinto's existing infrastructure, including ports and railway, power, communications and road networks. This will reduce the extent of new infrastructure required and result in a smaller disturbance footprint than would otherwise be required for a project of this scale.

A number of design options have been considered for specific aspects of the Proposed Change. Preferred options have been selected on the basis that they meet project requirements while minimising potential environmental impacts. Options for water supply, surplus water management, haul road routes, waste fines disposal, revision of the Mesa A MEZ and the rationale for the selection of preferred options are discussed as part of the assessment of impacts for relevant environmental factors.

2.3 Revised Proposal Description

2.3.1 Summary of the Revised Proposal

The Revised Proposal is a revision of the existing Mesa A/Warramboo Iron Ore Project, to extend the existing above water table Mesa A mine pit, extend the existing above water table Warramboo Mine pit both above and below water table, and develop four new nearby deposits: Highway (above the water table), Tod Bore (above the water table), Mesa B (above the water table) and Mesa C (above and below the water table) in the mine operations area (Table 2-2; Table 2-3).

The Revised Proposal includes the approved Mesa A/Warramboo Iron Ore Project as approved under Ministerial Statement 756 and the Proposed Changes that are described in this ERD. The Proposed Change to the approved Mesa A/Warramboo Iron Ore Project includes:

· Mine pits:

- Extension of the approved above water table Mesa A mine pit, including a revision of the Mesa A MEZ to accommodate preferential mining of higher quality ore
- Extension of the approved above water table Warramboo Mine pits both above and BWT
- o Development of new above water table mine pits at Mesa B
- o Development of new above and BWT mine pits at Mesa C
- Development of new above water table mine pits at Highway/Tod Bore
- Additional mineral waste management including but not limited to backfilling, outof-pit waste dumps, low grade ore dumps, topsoil and subsoil stockpiles and extensions to existing waste dumps
- Processing facilities including but not limited to a wet processing plant, in-pit waste fines storage facility (WFSF), reverse osmosis plant and disposal of reverse osmosis plant effluent
- Additional support facilities including but not limited to workshops, power supply infrastructure, explosives storage, hydrocarbon storage, laydown areas, laboratory, offices and waste water treatment plants
- Installation of infrastructure such as tracks, utilities, telecommunications, monitoring stations and abandonment bunds in the Mesa A MEZ and the proposed MEZs at Mesas B and C
- Additional surface water management infrastructure including but not limited to diversion drains, levees and culverts
- Additional linear infrastructure including but not limited to heavy vehicle and light vehicle haul and access roads, pipelines and power (including sub-stations) and communications distribution networks
- Warramboo borefield extension
- Dewatering infrastructure including extension to the approved Warramboo borefield and pipelines at Warramboo and new dewatering infrastructure at Mesa C.
- Management of surplus water including use in processing, use on-site, passive recharge via completed mine pits and controlled discharge to Warramboo Creek.

In this ERD, the assessment of environmental impacts associated with the Revised Proposal relates to the Proposed Change to the approved Mesa A/Warramboo Iron Ore Project. The impacts of the approved activities will be considered as part of the cumulative impact assessment. The new elements of the Revised Proposal listed above are referred to as the 'Proposed Change' and the activities associated with the existing Mesa A/Warramboo Iron Ore Project as approved under MS 756 will be referred to as 'approved activities'.

The Development Envelope for the Revised Proposal is shown in Figure 2-1. The Proposed Change will be undertaken in the western portion of the Development Envelope covering the mine pits, borefield and associated infrastructure. No additional disturbance is proposed within the existing infrastructure corridor approved under Ministerial Statement 756. A conceptual layout for the Revised Proposal that may be subject to some change in implementation, is shown in Figure 2-2.

Table 2-2: Summary of the Revised Proposal

Proposal title	Mesa A Hub Revised Proposal
Proponent name Robe River Mining Co. Pty. Ltd.	
Short description	The Revised Proposal includes the existing Mesa A/Warramboo Iron Ore Project and a revision which includes development of additional mine pits and associated infrastructure, water treatment facilities, processing facilities and water management infrastructure, as well as expansion of existing mine pits, waste dumps and associated infrastructure.

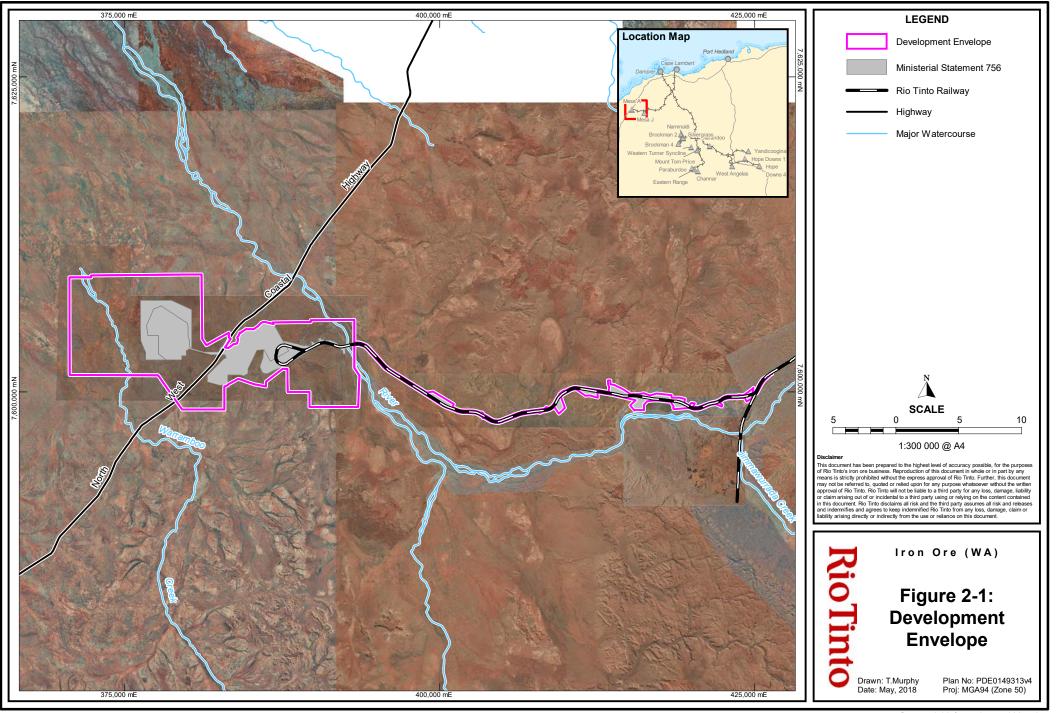
Table 2-3: Location and proposed extent of physical and operational elements

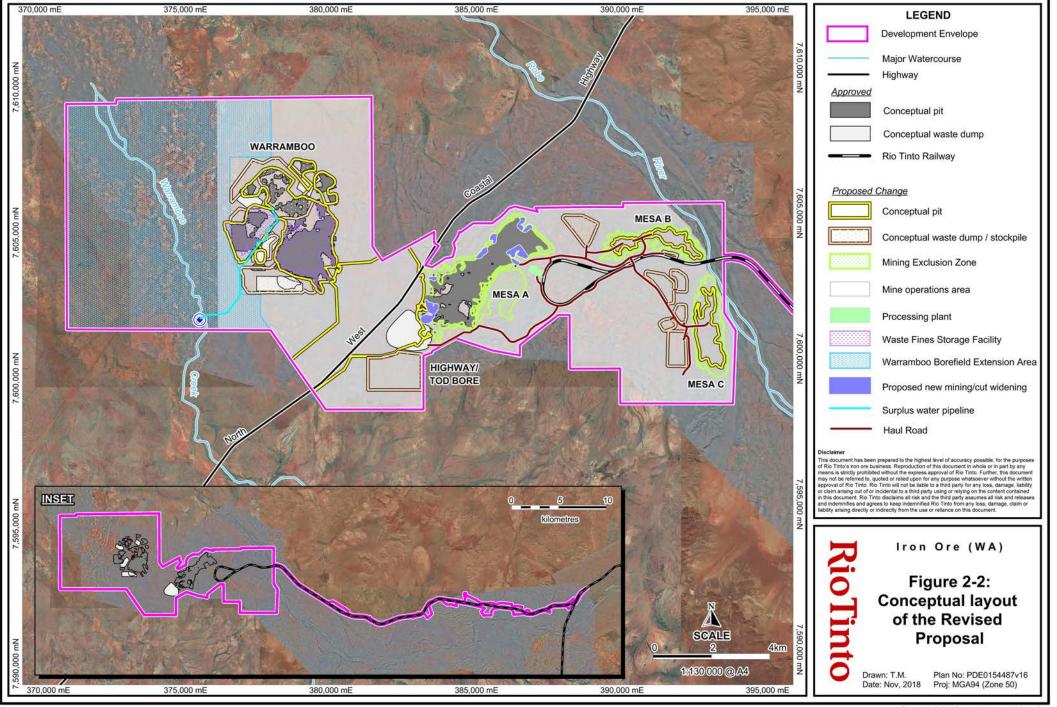
Element	Location	Existing approval (Ministerial Statement/s and other regulatory approvals)	Proposed change	Proposed extent (the Mesa A Hub Revised Proposal)	
Physical elements					
Mine and associated infrastructure	Figure 2-2	Not more than 3,680 hectares (ha) (with the exception of clearing in the MEZ, other than the approved portal and other infrastructure as per Figure 2 and Figure 4 of MS 756).	Clearing of no more than 3,000 ha of native vegetation within the Development Envelope of 16,834 ha. Disturbance in the defined Mesa A MEZ limited to 42 ha, including mining (33 ha), widening of the existing escarpment cut (2 ha) and installation of infrastructure (7 ha). Clearing in the Mesa B and Mesa C MEZs in accordance with the Environmental Management Plan.	Clearing of up to 6,680 ha within the Development Envelope of 16,834 ha. Disturbance in the Mesa A MEZ limited to that for the portal and other infrastructure as approved under MS 756 plus additional disturbance limited to 42 ha, including mining (33 ha), widening of the escarpment cut (2 ha) and installation of infrastructure (7 ha). Clearing in the Mesa B and Mesa C MEZs in	
Infrastructure corridor	Figure 2-1		No change	accordance with the Environmental Management Plan.	
Mining depth	Figure 2-2	Above water table.	Above water table at Mesa A, Mesa B and Highway/Tod Bore. Above and below water table at Warramboo and Mesa C.	Above water table at Mesa A, Mesa B, and Highway/Tod Bore. Above and below water table at Warramboo and Mesa C.	
Operational elements					
Water supply and Warramboo dewatering	Figure 2-2	3 gigalitres per annum (GL/a) (licensed under <i>Rights in Water and</i> <i>Irrigation Act 1914</i>)	Abstraction of no more than 15 GL/a (including the current licensed abstraction of 3 GL/a) of groundwater from the Warramboo dewatering (excludes surface water inflow due to rainfall events) and water supply borefield.	Abstraction of no more than 15 GL/a of groundwater from the Warramboo dewatering (excludes surface water inflow due to rainfall events) and water supply borefield.	

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Element	Location	Existing approval (Ministerial Statement/s and other regulatory approvals)	Proposed change	Proposed extent (the Mesa A Hub Revised Proposal)
Mesa C dewatering	Figure 2-2	-	Abstraction of no more than 5 GL/a of groundwater from the Mesa C CID Aquifer (excludes surface water inflow due to rainfall events).	Abstraction of no more than 5 GL/a of groundwater from the Mesa C CID Aquifer (excludes surface water inflow due to rainfall events).
			Use on-site, in processing, passive recharge via completed mine pits and controlled surface discharge to Warramboo Creek.	Use on-site, in processing, passive recharge via completed mine pits and controlled surface discharge to Warramboo Creek.
Surplus water management	Figure 2-2	-	Controlled surface discharge from the Proposed Change to extend along Warramboo Creek no further than 8 km downstream of the discharge point under natural no-flow conditions.	Controlled surface discharge from the Revised Proposal to extend along Warramboo Creek no further than 8 km downstream of the discharge point under natural no-flow conditions.
Ore processing (waste)	Figure 2-2	-	In-pit disposal of waste fines at Warramboo.	In-pit disposal of waste fines at Warramboo.

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2.3.2 Description of the resource

The deposits between Mesa C and Warramboo are believed to have formed as part of the Robe River palaeochannel in the late Mesozoic to early Tertiary period. The Warramboo and Highway/Tod Bore deposits form part of the buried downstream continuation of the Robe Pisolite deposit present at Mesas A, B and C.

2.3.3 Vegetation clearing and topsoil removal

A maximum of 3,000 ha (in addition to the currently approved 3,680 ha) within the Development Envelope of 16,834 ha will be subject to vegetation clearing.

Clearing of vegetation will occur during pre-strip activities to develop the mine pits and associated infrastructure. Fill for construction purposes will be sourced from the escarpment cuts at Mesas B and C, borrow pits and existing waste dumps in-pit at Mesa A and on the southern side of Mesa A.

Topsoil, subsoil and overburden will be removed during the bulk earthworks phase. Topsoil is an important resource in rehabilitation as it contains a natural seed bank and typically contains significant quantities of organic material and nutrients (required for successful rehabilitation) relative to subsoil or overburden material. Topsoil layers in the Pilbara are highly variable in thickness, ranging from minimal soil development on rocky areas to approximately 300 millimetres (mm) in valley areas. Stripped topsoil, subsoil and cleared vegetation will be stored in out-of-pit stockpiles for later use in areas being rehabilitated.

2.3.4 Mining

The Proposed Change includes development of new open cut mine pits at the Mesa B, Mesa C and Highway /Tod Bore deposits. The mine pits at Mesa B and Highway/Tod Bore will be above the water table; the mine pit at Mesa C will be approximately 90% above and 10% BWT.

The Proposed Change also includes an above water table extension of the existing mine pit at Mesa A and an above and BWT extension of the existing mine pits at Warramboo. Together with current approved mine pits at Warramboo, mining at Warramboo will be approximately 89% above and 11% BWT following implementation of the Proposed Change.

Dewatering of up to 15 GL/a at Warramboo will be required to enable BWT mining of the Warramboo deposit. Dewatering of 5 GL/a at Mesa C will be required to enable BWT mining of the Mesa C deposit.

Mining is anticipated to involve conventional drill, blast, load and haul techniques whereby the blasted material will be excavated and loaded into haul trucks (i.e. bulk mining methods).

2.3.5 Revision of the Mesa A Mining Exclusion Zone

The Mesa A MEZ requires revision to accommodate preferential mining of higher quality ore, additional access and other minor clearing. Proposed disturbance in the current Mesa A MEZ will be limited to 42 ha of which 33 ha is proposed for mining. The proposed mine pit shell has been designed to retain a substantial proportion of troglofauna habitat, maintaining interconnectivity between the material beneath the pit floor and the MEZ and avoiding singleton troglofauna records.

The proposed pit design will continue to meet the requirements of MS 756, Condition 8-1 and will result in retention of at least 50% of estimated total pre-mining material suitable as troglobitic fauna habitat (compared with 52% habitat retention with the current approved pit design). The proposed changes to the pit design will also result in decommissioning of one of the troglobitic fauna habitat monitoring stations; 11 monitoring stations will remain accessible.

The Proposed Change will require 2 ha of additional disturbance in the Mesa A MEZ in order to widen the existing escarpment cut. An additional 7 ha of clearing will be required to allow access to the proposed additional mining areas and retain access to infrastructure, including troglofauna monitoring stations, utilities, telecommunications, and abandonment bunds; such infrastructure is variously required to meet legal obligations and because of lack of alternative suitable locations.

2.3.6 Waste rock and low grade ore handling

Overburden and mineral waste will be used to progressively backfill mine pits where sequencing and schedules allow. Where sequencing and scheduling do not allow waste to be used for backfilling, out-of-pit waste dumps will be utilised. Out-of-pit storage will also be required for low grade ore.

2.3.7 Ore handling, processing and transport

Ore from all deposits will be hauled to Mesa A to tie-in with existing operations. Ore will be crushed at the existing primary crusher at Mesa A and then either directly transported to port or further processed using a wet beneficiation process (wet processing) at a wet processing plant to be constructed near Mesa A as part of the Proposed Change.

2.3.8 Waste fines residue handling

Waste fines will be generated by the wet processing plant and will be pumped from the wet processing plant to an in-pit WFSF to be developed at Warramboo as part of the Proposed Change. In-pit storage of waste fines will occur in an area of the pit that has previously been completely mined out of all ore.

2.3.9 Water supply and management

2.3.9.1 Water supply

Water will be required at the new deposits as part of the Proposed Change for construction and general mining activities, dust suppression on haul roads, and potable water supply. This water will be sourced from existing and new local bores or reticulated from the existing Mesa A header tanks.

Water will also be required for wet processing where not available from mine dewatering activities. This water will be sourced from the Warramboo borefield extension (the existing Warramboo borefield supplies water to the existing Mesa A/Warramboo Iron Ore Project). A reverse osmosis plant may be required for water sourced from the Warramboo borefield, to ensure suitable water chemistry for wet processing. Effluent generated by the reverse osmosis plant will be disposed of in-pit at Warramboo.

Peak water demand for the Revised Proposal is estimated to be up to 15 GL/a.

2.3.9.2 Surplus dewater management

All surplus water generated from dewatering the Mesa C deposit will be used on-site and for wet processing.

Where scheduling allows, surplus water generated from dewatering the Warramboo deposit will be used on-site and for wet processing. Where scheduling does not allow this, the surplus water will be discharged by controlled release to Warramboo Creek, south-west of the proposed operations. To assist in the management of surplus water discharge to Warramboo Creek, surplus water may also be discharged into existing mine pits at Warramboo enabling passive recharge of water back into the aquifer.

This proposed water management approach is consistent with the "Pilbara Water in Mining Guideline" (Government of Western Australia 2009) which identifies options for use and/or release of dewatering discharge as:

- Efficient on-site use, including mitigation of any impacts
- Used for fit-for-purpose activities (such as processing and dust suppression)
- Transferred to meet other demand including other proponents in the area and public water supply
- Injection back into the aquifer
- Controlled release to the environment where the dewater release is allowed to flow (either through a pipe or overland) into a designated water course or wetland.

There is no other mine or water user in close enough proximity to the Development Envelope to make transfer to another proponent feasible and local aquifers are not considered suitable for active re-injection (see Section 8.6.1).

2.3.9.3 Surface water management infrastructure

Operations are located on the fringes of floodplain areas and are mainly outside modelled critical flood levels. Some flood protection for mine pits and ore processing facilities will be installed to minimise production loss due to water ingress or erosion. These will be designed to largely direct water past operational areas within existing flow networks. Local water management may include interception and re-direction of surface flows and is expected to include diversion drains and culverts where required.

2.3.10 Power supply

Power supply for the Proposed Change will include sub-stations and diesel-power generation units. The existing overhead power line between the Pannawonica switchyard and the Mesa A/Mesa J tee-off will be duplicated to provide power for the Proposed Change. Duplication of this section of overhead power line is excluded from the Proposed Change and will be subject to relevant provisions under Part V (Land Clearing and Works Approval/Licensing) of the EP Act.

2.3.11 Road access and infrastructure

New haul roads will be established between Mesas A, B and C (Figure 2-2). Mesa escarpment cuts will be required at Mesas B and C to allow ore to be hauled from the proposed Mesas B and C mine pits to Mesa A. The existing mesa escarpment cut at Mesa A will be widened by approximately 100 m, to allow haul trucks from Mesas B and C to access the primary crusher at Mesa A. Existing tracks at Mesas B and C will be widened by approximately 1 m (including use of rock-breakers if required) to provide temporary access to the tops of the mesas so that the permanent escarpment cuts can be formed.

2.3.12 Workforce and accommodation

Existing fly-in fly-out accommodation at Mesa A will be utilised for the ongoing operations workforce for the Revised Proposal. The existing Mesa A/Warramboo Iron Ore Project workforce will transition as required from Mesa A/Warramboo to the deposits included in the Proposed Change. It is anticipated that the operational workforce will increase by approximately 50 roles with the development of the new deposits and the addition of the wet plant and associated facilities (refer Section 2.3.14).

Additional temporary accommodation will be required to support the construction phase of the Proposed Change. Establishment and operation of a construction camp is excluded from the Proposed Change and will be subject to relevant provisions under Part V (Land Clearing and Works Approval/Licensing) of the EP Act.

2.3.13 Non-mineral waste disposal

The Proponent has existing systems and procedures to collect and recycle waste streams such as hydrocarbon wastes (oil, drums, rags, filters, etc.), tyres, batteries, scrap metal and conveyor belting. These existing systems will be used for the Revised Proposal. Hazardous wastes will be collected and removed for treatment by licensed contractors. General waste from the Mesa A/Warramboo Iron Ore Project is disposed of at the existing Deepdale Landfill. General waste from the Revised Proposal will continue to be disposed of at the Deepdale Landfill. Some inert waste may be disposed of at the Mesa A Hub site.

2.3.14 Other ancillary mining facilities

Existing communications systems will be extended, including installation of fibre optic cables, to support new (proposed) mining areas. Other facilities such as waste water treatment plants, explosive storage, fuel storage, diesel-power generation units, laboratory, workshops, offices and laydown areas will also be required.

2.3.15 Exclusions from the Proposed Change

The scope of the Proposed Change specifically excludes:

- Activities that are part of the existing Mesa A/Warramboo Iron Ore Project as approved under Ministerial Statement 756
- Low impact activities, including drilling and associated activities (such as
 upgrades to existing roads/tracks) for resource evaluation, geotechnical
 assessment and hydrogeological investigations to support the environmental
 assessment of the Proposed Change (to be subject to relevant provisions under
 Part V [Land Clearing] of the EP Act)

- Essential environmental, heritage and other studies/investigations involving fieldwork
- Duplication of a 9 km section of overhead power line between the Pannawonica switchyard and the Mesa A/Mesa J tee-off (to be subject to relevant provisions under Part V [Land Clearing and Works Approval/Licensing] of the EP Act)
- Establishment of a construction camp to support the construction phase of the Proposed Change (to be subject to relevant provisions under Part V [Land Clearing and Works Approvals/Licensing] of the EP Act)
- Establishment of temporary services (communications, water supply and power), temporary concrete batch plant, site offices, access roads and laydown areas to support establishment of a construction camp (to be subject to relevant provisions under Part V [Land Clearing and Works Approval/Licensing] of the EP Act)
- Establishment of borrow pits/quarry to provide suitable material for construction of any items excluded from assessment under Part IV of the EP Act (to be subject to relevant provisions under Part V [Land Clearing] of the EP Act).
- Re-alignment of the North West Coastal Highway to allow access to the Highway/Tod Bore deposit. Separate approval will be sought for this aspect (see Section 2.4).

2.4 Local and Regional Context

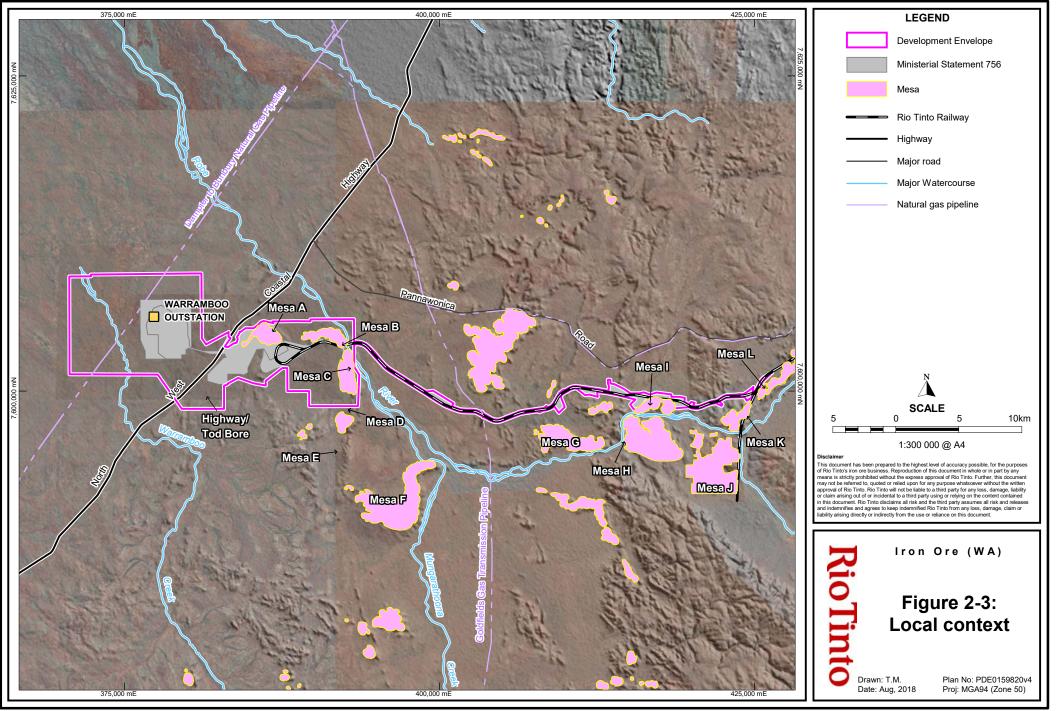
The Revised Proposal is located in the Robe Valley within the Pilbara region of Western Australia, in the Shire of Ashburton (Figure 1-1). The Robe Valley is traversed by the Robe River, which is one of several major river systems in the Pilbara and flows generally westward over approximately 190 km. The Robe River intersects the Development Envelope and passes approximately 50 m to the east of Mesas B and C at its closest point (Figure 2-2). For the majority of its course, the Robe River is ephemeral with a wide, shallow floodplain. During the dry season, surface water is restricted to a series of permanent or semi-permanent pools along sections of the Robe River that are maintained by sub-surface flow.

Warramboo Creek also intersects the Development Envelope and passes approximately 1 km to the west of the Warramboo deposit (Figure 2-2). Warramboo Creek is ephemeral and drains generally from south-east to north-west. It is well-defined for much of its course before it discharges onto the poorly defined scrubland of the coastal plain.

Throughout the Robe Valley, on both sides of the Robe River, numerous mesa formations occur and are comprised primarily of Robe Pisolite² (Figure 2-3). The Robe Valley mesas are mostly elevated areas of land that protrude above the surrounding landscape and have relatively flat tops and steep sides or escarpments. The escarpments of some of the Robe Valley mesas contain deep gullies and/or caves. The Robe Pisolite is believed to have been deposited in the palaeochannels of the ancestral Robe River system and, as a result of regional uplift and subsequent erosion, to have been exposed along the Robe Valley as a series of mesas. The Warramboo and Highway/Tod Bore deposits form part of the buried downstream continuation of the Robe Pisolite deposit present at Mesas A, B and C.

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² Pisolitic ore consists primarily of a mixture of iron minerals with minor clay and silica. The majority of the pisolite is made up of spherical accretions of iron minerals called pisoliths.



The most significant environmental values within and directly adjacent to the Development Envelope include the escarpments of Mesas B and C contain deep gullies that represent significant habitat features for terrestrial fauna. A semi-permanent pool present in the Robe River adjacent to Mesa B, and the riparian vegetation of the Robe River and Warramboo Creek also represent significant habitat features for terrestrial fauna. Vegetation associated with riparian habitat along the Robe River and the Sand Sheet PEC located at the base of the south-eastern side of Mesa A (see Section 5.4) are of high local significance.

Existing land uses in the Development Envelope include pastoral activities (Yarraloola Station and Yalleen Station), mineral exploration, mining activities and Traditional Owner activities such as camping, fishing and hunting (refer to Figure 1-2 for land tenure). The mesa profiles are also used by Traditional Owners as navigational landmarks. The Dampier to Bunbury natural gas pipeline runs to the north-west of the Warramboo deposit, within the Development Envelope and the Goldfields Gas Transmission Pipeline also crosses over the existing Mesa A/Warramboo Iron Ore Project infrastructure corridor (Figure 2-3). The North West Coastal Highway runs between the Mesa A and Warramboo deposits, directly through the Highway/Tod bore deposit (Figure 2-3). This section of the Highway will require re-alignment prior to mining the Highway/Tod Bore deposit. It is anticipated that separate approval for the re-alignment of the Highway will be required. Consultation and investigations to determine the most appropriate alignment will be initiated well in advance of commencement of mining of the Highway/Tod Bore deposit.

3. STAKEHOLDER ENGAGEMENT

3.1 Key Stakeholders

Key stakeholders for the Revised Proposal were identified based on the Proponent's experience in recent and similar project developments in the Pilbara. The following key stakeholders were identified:

- Department of Jobs, Tourism, Science and Innovation (DJTSI) (formerly the Department of State Development)
- Department of Mines, Industry Regulation and Safety (DMIRS) (formerly the DMP)
- DWER, specifically:
 - Environmental Protection Authority Services (EPA Services) (formerly the Office of the Environmental Protection Authority)
 - o Regulatory Services: Water (formerly the Department of Water)
- Department of Biodiversity, Conservation and Attractions (DBCA), specifically Parks and Wildlife Service (formerly the Department of Parks and Wildlife)
- Dampier Bunbury Pipeline (DBP)
- Kuruma Marthudunera People.

3.2 Stakeholder Engagement Process

Consultation on the Proposed Change commenced in 2015 and has included discussions with a number of key stakeholders (Table 3-1). The timing of the consultation program has enabled topics raised to be considered in the early design phase of the Proposed Change, during determination of mitigation measures and as part of the preparation of the ERD.

A draft version of this document was provided to the Kuruma Marthudunera People on 19 July 2018 and the final version will be provided as soon as practicable.

3.3 Stakeholder Consultation

The most common topics/issues raised by stakeholders as part of the stakeholder engagement program (Table 3-1) were:

- Subterranean fauna, including maintenance of adequate troglofauna retention zones and contextual information on presence/absence of subterranean fauna species across the Robe Valley mesas
- Mine closure, including early consideration of abandonment bund placement and installation
- Warramboo outstation (Figure 2-3), particularly exclusion of the outstation from the mining footprint and maintenance of access to the outstation.

Table 3-1: Stakeholder consultation

Stakeholder	Date	Issues/topics raised	Proponent response/outcome
Kuruma Marthudunera People	24 March 2015	The Proponent provided an overview of the scope of the Proposed Change. The Proponent advised the Kuruma Marthudunera People that biological surveys were scheduled and provided maps of the proposed survey locations. The Proponent requested heritage surveys. The Kuruma Marthudunera People sought clarification regarding current access to Warramboo outstation and the proposed mine development schedule.	The Proponent confirmed that access to Warramboo outstation is available provided the drill and blast team is contacted prior to any visit.
Kuruma Marthudunera People	2 September 2015	The Proponent provided an update on the status of biological surveys and provided preliminary results from biological surveys. The Kuruma Marthudunera People discussed mining near the Warramboo outstation.	The Proponent confirmed that the Warramboo outstation will be excluded from mining and that access to the site will be maintained subject to safety constraints. A procedure is in place to allow safe access.
Kuruma Marthudunera People	4 April 2016	The Proponent provided a summary of results from biological surveys and provided information regarding the planned 2016 biological survey work.	No specific response or further action required from the Proponent.
EPA Services ³	10 May 2016	The Proponent provided an overview of the scope of the Proposed Change and a summary of the biological survey results and likely key environmental factors for the environmental assessment of the Proposed Change. EPA Services advised that the Proponent would need to show that the Proposed Change will meet the EPA objective for subterranean fauna. EPA Services recommended a meeting with the Terrestrial Ecosystems Branch (TEB) to discuss the proposed troglofauna habitat retention zones.	The Proponent has completed additional troglofauna studies to demonstrate that the Proposed Change will meet the EPA objective for subterranean fauna (refer Section 6.7). The Proponent met with the TEB on 1 May 2017 following additional troglofauna sampling (refer to entry below).

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³ Formerly the Office of the EPA

Stakeholder	Date	Issues/topics raised	Proponent response/outcome
DMIRS ⁴	30 June 2016	The Proponent provided an overview of the scope of the Proposed Change, the tenure context and tenure requirements and a summary of the likely key environmental factors for the environmental assessment of the Proposed Change. The DMIRS advised that abandonment bund placement and installation need to be considered early in mine planning and mine development to ensure these structures are not precluded from being installed at closure. The DMIRS sought clarification on whether different subterranean fauna	The Proponent acknowledged that the Mine Closure Plan will reflect current closure requirements. The Proponent confirmed that different troglofauna species are generally recorded on different mesas and that contextual subterranean fauna survey work has been undertaken on other mesas in the
		species have been recorded on each mesa and whether contextual work had been undertaken on remaining mesas.	Robe Valley.
DJTSI ⁵	25 August 2016	The Proponent provided an overview of the scope of the Proposed Change.	The Proponent confirmed a Proposal requesting approval for the development will be submitted to the DJTSI following funding approval and approval under Part IV of the EP Act.
Kuruma Marthudunera People	5-6 October 2016	The Proponent discussed tenure requests and cultural heritage management and provided an update on the Life of Mine studies. The Kuruma Marthudunera People agreed that seeking Section 18 consent under the AH Act for potential disturbance to all the rock shelters at Mesas B and C is a logical pathway forward.	The Proponent will work with the Kuruma Marthudunera Aboriginal Corporation to confirm the outcomes required for Section 18 consent for the rock shelters.

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⁴ Formerly the Department of Mines and Petroleum

⁵ Formerly the Department of State Development

Stakeholder	Date	Issues/topics raised	Proponent response/outcome
DWER ⁶	15 November 2016	The Proponent provided an overview of the scope of the Proposed Change. The DWER requested technical engagement prior to development of numerical hydrogeological models. The DWER requested that details of surplus water disposal options be presented during the Environmental Impact Assessment process.	The Proponent conducted technical engagement with the DWER on 14 February 2017 and 15 February 2018 (refer to entries below).
Kuruma Marthudunera People	Eight separate consultation sessions between December 2016 and November 2017	Eight separate consultation sessions were held, the majority of which were part of the Heritage Sub-Committee meetings or the Heritage Advisory Committee meetings. Discussion items included general project design updates, upcoming Section 16 and Section 18 work related to the Proposed Change, the mesa landforms and the hydrology and vegetation of the Robe River.	The Proponent addressed any queries as they arose during the consultation sessions. Regular updates regarding the Proposed Change were requested. Regular updates have been and will continue to be provided.
DMIRS	24 January 2017	The Proponent provided an overview of the Mesa A Hub Closure Plan that is in preparation. The DMIRS commended the fact that abandonment bund design and consideration is incorporated into study outputs. The DMIRS agreed that the Plan can contain some knowledge gaps as long as there is a process to close-out the gaps before the final Closure Plan for the site is submitted.	The Closure Plan will be submitted with the ERD (refer Appendix 3).
DWER	14 February 2017	The Proponent presented a summary of the hydrogeological drilling and monitoring program in the Robe Valley and conceptual hydrogeological models for Mesa C and Warramboo. The DWER queried the lack of evapotranspiration in the Warramboo conceptual model and whether there are likely to be any issues with PAF material. The DWER noted that consideration of cumulative impact assessment for the lower Robe River will be expected as part of the Environmental Impact Assessment.	The Proponent explained that the lack of evapotranspiration in the Warramboo conceptual model is because there is little vegetation along Warramboo Creek that is likely to be utilising groundwater. The Proponent explained that no PAF issues are anticipated based on geology and geochemical

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⁶ Formerly the Department of Water

Stakeholder	Date	Issues/topics raised	Proponent response/outcome
		The proposed consultant to peer review the hydrogeological model was discussed.	assessment undertaken to date (refer Section 8.6.3).
		The Proponent offered to arrange a site visit which was accepted by the DWER.	
Parks and Wildlife Service	24 March 2017	The Proponent provided an outline of the scope of the Proposed Change. The Proponent provided a status update and overview of survey results. Parks and Wildlife Service indicated that the full context for flora and vegetation should be included in the ERD. That is, all available data should be used when discussing species distribution. Parks and Wildlife Service asked if the Sand Sheet PEC is monitored and indicated that the current data should be included in the ERD. Parks and Wildlife Service advised that Ghost Bat roost context needs to be provided including locations of, and information about, roosts outside the Development Envelope, whether the potential diurnal/maternal roost at Mesa A is currently being used by Ghost Bats. Parks and Wildlife Service queried whether the North West Coastal Hwy will remain in the same location once the Highway/Tod Bore deposit is mined. Parks and Wildlife noted that this is a complex Proposal so two weeks for DMA to sign-off isn't really enough. Parks and Wildlife Service suggested a technical consultation session on subfauna and possibly bats (depending on the information provided in the ERD)	The Proponent agreed to provide full vegetation/species context in the ERD (refer Sections 5.4, 5.5 and 1.1). The Proponent agreed to include relevant Sand Sheet PEC monitoring information in the ERD (refer Section 5.4). The Proponent indicated that additional work to assess Ghost Bat roosts is underway (refer Section 7.4). The Proponent indicated that the North West Coastal Highway will require re-alignment prior to mining the Highway/Tod Bore deposit (refer Sections 1.4.4, 2.4 and 9.6). The Proponent agreed to initiate technical consultation after ERD submission.
Kuruma Marthudunera People	4 April 2017	soon after submission of the ERD would be useful. The Proponent provided an update on Life of Mine planning and provided an overview of mine design to minimise heritage impacts. The Proponent also provided an update on the progress of environmental approvals.	No specific response or action required from the Proponent.

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Stakeholder	Date	Issues/topics raised	Proponent response/outcome
DWER	11, 12 April 2017	The Proponent provided an outline of the Proposed Change during a site visit. Discussions were around current understanding and conceptualisation of the hydrology and hydrogeology for all of the Robe Valley existing operations and proposed developments. Items raised by the DWER included: • Discussions around the detail of hydrogeological conceptualisations, gaps in knowledge, and assumptions and how these are being addressed, including how this informs the impact assessment and approach to managing water • Asked what fish species are found in the Robe River • Indication that they would like to see consideration of cumulative impacts both at the local scale of the Proposed Change and also on the broader catchment (Robe Valley) scale • What suite of hydro and environmental monitoring is currently undertaken and frequency, including subterranean fauna • Asked whether there are any significant environmental receptors including any pools in the vicinity • Asked what the extent of the cones of depression would be and if any stygofauna are restricted to the borefield groundwater drawdown area • Asked how much of Warramboo Creek would be impacted by the proposed discharge and for what duration • Asked if there are baseline data for the riparian vegetation of Warramboo Creek • Asked what the discharge water quality into Warramboo Creek would be • Asked what the proposed closure approach for BWT pits is and whether there would be pit lakes.	The queries and requests for technical information have been addressed as far as possible in this ERD. Please refer to the following sections which correspond to each dot point: Section 8 Section 7.4.7.5 Section 8.6.4 Section 8 and Section 6.4.1.2 Section 8.4 Section 8.5.1and 6.5.3.1 Section 8.6.2.2 Section 5.6.2 Section 8.6.3.4 Section 8.7
EPA Services	18 April and 8 June 2017	Discussion of requirements of the ESD, including discussion of some work requirements that aren't technically feasible.	Clarification of the requirements of the ESD was provided by the EPA.

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Stakeholder	Date	Issues/topics raised	Proponent response/outcome
EPA Services (TEB)	1 May 2017	The Proponent provided an outline of the Proposed Change. The Proponent provided a summary of troglofauna sampling and results. The Proponent presented the troglofauna habitat assessment modelling for Warramboo and Highway/Tod Bore deposits. The Proponent also presented conceptual troglofauna habitat retention areas and singleton avoidance areas for Mesas B and C. The EPA Services advised the Proponent to provide justification for the areas, volumes and widths selected as MEZ in terms of suitability for troglofauna. The EPA Services advised that data from troglofauna sampling at Mesa A and analysis of downhole humidity and temperature data should be used to justify selected areas. The EPA Services asked whether the same troglofauna species are present inside and outside the Warramboo impact zone and whether additional sampling will be done. The EPA Services requested that null results through the broader Warramboo area are shown. The proposed changes to the Mesa A MEZ were discussed. The EPA Services advised that the EPA Board would like to do a site visit to see how the Mesa A MEZ is managed. Suggested timing is after submission of the draft ERD.	Justification for selection of the MEZs, including outcomes from analysis of data from Mesa A is provided in Section 6.4.4 of the ERD. The Proponent supports an EPA Board visit to the Development Envelope; this is to be progressed following submission of the ERD. Additional troglofauna sampling has been undertaken in the broader Warramboo area; results are included in the ERD. Further sampling is underway; results are anticipated to become available during the Environmental Impact Assessment process.
DBP	21 August 2017	DBP requirements for installation of infrastructure that will cross the Dampier to Bunbury Natural Gas Pipeline easement were discussed.	The Proponent noted the DBP requirements and has designed the infrastructure accordingly. The Proponent will seek Section 41 approval under the Dampier to Bunbury Pipeline Act 1997 as advised by the DBP.
DWER	12 October 2017	An overview of the Proposed Change and required EP Act Part V approvals was provided.	No specific response or additional action required from the Proponent other than standard application procedures.

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Stakeholder	Date	Issues/topics raised	Proponent response/outcome	
Kuruma Marthudunera People	17 October 2017	An update of the Proposed Change design was provided describing how the Proposed Change has been designed to avoid direct impacts to rock shelters and how Yirrkawiya Gap will be protected. The Proponent stated that Section 16 and Section 18 applications will still be required for the majority of rock shelters at Mesas B and C due to the potential for indirect impacts. The Kuruma Marthudunera People requested further consultation about the rock shelters at Mesa B with spinifex matting (field ID MBC15_36) and the feasibility of protecting these sites.	The Proponent has undertaken further on-site consultation with the Kuruma Marthudunera People regarding site MBC15_36. In agreement with the Kuruma Marthudunera People, the Proponent plans to lodge Section 16 applications for investigation of the spinifex matting. The Proposed Change will avoid disturbance to site MBC15_36.	
DJTSI	21 November 2017	The Proponent advised that tenure applications have been made to support the Proposed Change.	The Proponent will provide a full overview of tenure applications to DJTSI once the full footprint of the area off current tenure is known.	
Kuruma Marthudunera Aboriginal Corporation (KMAC)	15 December 2017	The Proponent presented a 3-dimensional hydrogeological visualisation program for areas in the Robe Valley.	KMAC were pleased with the program and requested the iOS and Android links.	
DJTSI	30 January 2018	The Proponent discussed current and proposed tenure applications relating to the Proposed Change.	No specific response or further action required from the Proponent.	

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Stakeholder	Date	Issues/topics raised	Proponent response/outcome
DWER	15 February 2018	The Proponent provided an update on hydrogeological modelling and the Environmental Impact Assessment for the Proposed Change. DWER queried whether isolated pockets of stygofauna habitat will be created by the proposed drawdown at Warramboo. DWER queried whether the interaction between surface discharge to Warramboo Creek and beneath Warramboo Creek was considered in the hydrogeological modelling.	The Proponent explained that isolated pockets of stygofauna habitat are unlikely to be created at Warramboo as there are no known barriers to stygofauna dispersion and stygofauna habitat will continue to be present below the cone of depression and outside the lateral extent of drawdown. The Proponent explained that the modelling does not consider interaction between discharged surplus water and drawdown because discharge and maximum drawdown are proposed to occur at different times.
Yarraloola Pastoral Station	11 April 2018	The Proponent provided an overview of the Proposed Change. Yarraloola Pastoral Station indicated that the Proposed Change will have only limited impact on the pastoral operation. Yarraloola Station noted three water bores that may dry up as they are not deep enough.	The Proponent will investigate how deep the bores are. The Proponent will update the Pastoral Station updated on changes to infrastructure and progress of the Proposed Change.
DotEE	18 October 2018	The Proponent provided an overview of the Proposal. The Proponent also provided an overview of the most recent survey results on Ghost Bat utilisation of caves in previously mined areas and adjacent to existing Mesa J and A operations and the latest preliminary information on broader Pilbara Leafnosed Bat range extents. Potential offset mechanisms were broadly discussed for iron ore projects in the Pilbara.	No specific response required from the Proponent. The Proponent indicated willingness to provide additional information to DotEE as part of the assessment process.

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4. ENVIRONMENTAL PRINCIPLES AND FACTORS

4.1 EP Act Principles

Table 4-1 provides details on how the EP Act principles have been considered in relation to the Proposed Change. The assessment of the impacts on each environmental factor from the Proposed Change is presented in Sections 5 to 13.

Table 4-1: EP Act principles

Principle Consideration The precautionary principle Comprehensive biological surveys have Where there are threats of serious or irreversible been undertaken for the Proposed Change. damage, lack of full scientific certainty should The results of the biological surveys have not be used as a reason for postponing been used to guide the design phase of the measures to prevent environmental degradation. Proposed Change. Where significant In application of this precautionary principle, potential environmental impacts have been decisions should be guided by: identified, the relative risk has been evaluated and measures have been, and will a) careful evaluation to avoid, where practicable, continue to be, incorporated into the design serious or irreversible damage to the and management of the Proposed Change to environment; and avoid or minimise these impacts where b) an assessment of the risk-weighted practical. consequences of various options. The Proposed Change will make a long-term contribution to the economic prosperity of Western Australia. The Proposed Change will not compromise The principle of intergenerational equity current or foreseeable future land use The present generation should ensure that the options in the area. health, diversity and productivity of the The Proposed Change can be effectively environment is maintained and enhanced for the managed through avoidance, management benefit of future generations. and mitigation measures to ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations. Principles relating to improved valuation, pricing and incentive mechanisms Comprehensive biological surveys have (1) Environmental factors should be included in been undertaken for the Proposed Change the valuation of assets and services. and have identified aspects of the environment that are of conservation (2) The polluter pays principles – those who generate pollution and waste should bear the significance. Where significant potential environmental impacts have been identified, cost of containment, avoidance and abatement. measures have been, and will continue to (3) The users of goods and services should pay be, incorporated into the design and prices based on the full life-cycle costs of management of the Proposed Change to providing goods and services, including the use avoid or minimise these impacts where of natural resources and assets and the ultimate practical. disposal of any waste. The Proponent's Health, Safety, Environmental goals, having been established, Environment, Community and Quality should be pursued in the most cost-effective Management System has established way, by establishing incentive structure, rehabilitation procedures for restoring including market mechanisms, which enable disturbed environments. those best placed to maximise benefits and/or

minimise costs to develop their own solution.

Principle	Consideration	
The principle of the conservation of biological diversity and ecological integrity Conservation of biological diversity and ecological integrity should be a fundamental consideration.	The results from comprehensive biological surveys have been used to guide the design of the Proposed Change. The Proposed Change has been designed to avoid or minimise disturbance to high value habitats in order to maintain biological diversity and ecological integrity. The Proposed Change will be subject to a Mine Closure Plan prepared in accordance with the DMP and EPA Guidelines for Preparing Mine Closure Plans (2015) and the Rio Tinto Closure Standard. This will provide the basis for ensuring that postmining land use objectives are identified (through a consultative process) and can be met. The Proponent will undertake land rehabilitation activities to underpin the mine	
The principle of waste minimisation All reasonable and practicable measures should be taken to minimise the generation of waste and its discharge into the environment.	Application of the Proponent's management policies, systems and procedures, in combination with the Mine Closure Plan, will provide the basis for minimising the generation of waste and its discharge into the environment. Mine planning objectives to minimise stripping ratios, thereby reducing mineral waste materials volumes, will assist in meeting the aims of this principle.	

4.2 EPA environmental factors

The preliminary key environmental factors relevant to the Proposed Change are (as outlined in the ESD):

- Flora and Vegetation
- Subterranean Fauna
- Terrestrial Fauna
- Hydrological Processes and Inland Waters Environmental Quality
- Landforms
- Social Surroundings.

During the course of preparation of the ERD, 'Air quality' was requested to be included as an 'Other Environmental Factor' by EPA Services.

5. FLORA AND VEGETATION

This section describes the flora and vegetation that occur within the western portion of the Development Envelope and provides an assessment of the potential impacts of the Proposed Change to conservation significant flora and vegetation, proposed mitigation measures and the predicted outcome for this key environmental factor.

5.1 EPA Objective

The EPA's objective for flora and vegetation is to protect flora and vegetation so that biological diversity and ecological integrity are maintained.

5.2 Policy and Guidance

The following policy and guidance documents have been considered in the assessment of flora and vegetation.

5.2.1 EPA policy and guidance

- Cumulative environmental impacts of development in the Pilbara region: Advice
 of the Environmental Protection Authority to the Minister for Environment under
 Section 16(e) of the Environmental Protection Act 1986 (EPA 2014)
- DMP and EPA Guidelines for Preparing Mine Closure Plans (DMP and EPA 2015)
- Statement of Environmental Principles, Factors and Objectives (EPA 2018a)
- EPA Environmental Factor Guideline: Flora and Vegetation (EPA 2016b)
- Environmental Factor Guideline Inland Waters Environmental Quality (EPA 2016c)
- EPA Technical Guidance: Flora and Vegetation Surveys for Environmental Impact Assessment (EPA 2016d)
- Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (EPA 2016e).

5.2.2 Other policy and guidance

- WA Environmental Offsets Policy (Government of Western Australia 2011)
- WA Environmental Offsets Guidelines (Government of Western Australia 2014).

5.3 Environmental Scoping Document

Table 5-1 summarises where the requirements of the ESD are addressed in this Section.

Table 5-1: Requirements of the ESD for flora and vegetation

Task number	Requirement of ESD	Comments
1	Identify and characterise flora and vegetation in accordance with the requirements of Technical Guidance - Flora and Vegetation Surveys for Environmental Impact Assessment, December 2016. The survey should take into account areas that are likely to be directly or indirectly impacted as a result of the Proposal. For surveys previously undertaken of the Proposal and adjacent areas, demonstrate how these surveys are relevant and representative of the Development Envelope and if they are consistent with EPA Policy, and summarise their findings.	Section 5.4
2	Undertake baseline mapping of weed affected areas in any area likely to be directly or indirectly impacted by the Proposal.	Section 5.4.6
3	Provide an analysis of the vegetation and significant flora species present and likely to be present within the Development Envelope and indirect disturbance areas outside of the Development Envelope. Include an assessment of the relevance of any vegetation and significant flora species in a local and regional context. Include a quantitative assessment of levels of impact on conservation significant species, communities or vegetation units. For species, this includes numbers and proportions of individuals for the species in a local and regional context, and numbers and proportions of populations directly or potentially indirectly impacted. For communities and vegetation units this includes the area (in hectares) and proportions directly or potentially indirectly impacted.	Sections 5.5 and 1.1
4	Provide a clear set of data that shows the impact (direct, indirect and secondary) from the existing approved project to date against the currently approved footprint and proposed additional impact (direct, indirect and secondary) for the expanded Proposal.	Section 5.5, 1.1, 5.4.4.1
5	Provide information on the current status and outcomes of current activities to ensure that no significant adverse effects through direct or indirect impacts to the Sand Sheet PEC have occurred from the implementation of the Proposal as required by Condition 7-1 in Ministerial Statement 756.	Section 5.4.4.1
6	Review and revise the current Flora and Vegetation management plan in relation to the requirements of Condition 7 in Ministerial Statement 756, to apply to the entire Proposal. The following should be addressed in the plan:	Appendix 4 The draft EMP includes monitoring of the regionally significant Sand Sheet PEC and riparian vegetation

Task number	Requirement of ESD	Comments
	 Invasive species control – control of weeds, in particular through the infrastructure corridor, other transport and/or entry and exit points and in areas of native vegetation including the Sand Sheet PEC and vegetation units considered to have high local significance (e.g. rare units, habitat for conservation significant species) Monitoring program – to monitor the health of significant flora species and vegetation identified, including (but not limited to) the Sand Sheet PEC, <i>Triodia</i> sp. Robe River (M. E. Trudgen et al. MET 12367) P3, <i>Rhynchosia bungarensis</i> P4 and <i>Goodenia nuda</i>. 	considered to be of high and moderate local significance. The mitigation hierarchy has been considered in the design of the Proposed Change. As detailed in Sections 5.5.1 and 5.6.1, the Proposed Change will avoid disturbance to Priority Flora such that the Proposed Change is unlikely to result in significant impacts to Priority Flora. As the Proposed Change is unlikely to result in significant impacts to Priority Flora, monitoring of Priority Flora, monitoring of Priority Flora is not considered warranted. This is consistent with other mining operations.
7	Provide an analysis of any additional potential impacts from the Proposal in relation to dewatering and discharge activities.	Section 5.6.2
8	Provide a detailed description of the cumulative impacts associated with the Proposal, including direct impacts from clearing, and indirect impacts such as groundwater drawdown, altered drainage, changes in water quality, spread of weeds, fragmentation of vegetation, altered fire regime, and dust.	Section 5.6.3
9	Provide tables and maps of the proposed clearing and predicted indirect impact to vegetation and significant flora species, including but not limited to threatened and/or Priority Ecological Communities, threatened flora, Priority Flora, unnamed or new flora species.	Sections 5.5 and 1.1
10	Discuss, and determine significance of, potential direct, indirect (such as dust downstream impacts, weed invasion, etc.) and cumulative impacts (including in relation to the existing project) to flora and vegetation as a result of the Proposal at a local and regional level.	Sections 1.1, 0 and 5.8
11	Demonstrate that all practicable measures have been taken to reduce both the area of the proposed disturbance footprint and the Development Envelope based on progress in the Proposal design and understanding of the environmental impacts.	Section 5.8 and 5.6.1
12	Demonstrate application of the mitigation hierarchy to avoid and minimise impacts to flora and vegetation.	Section 5.8
13	Discuss management measures, outcomes/objectives sought to ensure residual impacts (direct and indirect) are not greater than predicted.	Section 5.8

Task number	Requirement of ESD	Comments
14	Prepare a Mine Closure Plan consistent with DMP and EPA Guidelines for Preparing Mine Closure Plans (2015), which includes methodologies and criteria to ensure progressive rehabilitation of disturbed areas with vegetation composed of native species of local provenance.	Appendix 3
15	Describe the residual impacts for the Proposal and analyse these impacts to identify and detail any that are significant	Section 5.8 and 13
16	Create an offsets position following application of the 'mitigation hierarchy'.	Section 5.8 and 13
17	Demonstrate and document in the ERD how the EPA's objective for this factor can be met.	Section 5.8 and 13

5.4 Receiving Environment

5.4.1 Flora and vegetation studies

Numerous flora and vegetation surveys have been conducted within the western portion of the Development Envelope and the wider Mesa A locality (Biota 2005a, 2006a, 2010a, 2011a, MWH 2016, Stantec 2018). Rio Tinto also conducted a broader study of riparian vegetation communities throughout the Robe Valley to identify the distribution of potential groundwater dependent ecosystems (GDEs) present (Rio Tinto 2017a). A consolidated list of flora and vegetation surveys completed to date is provided in Table 5-2. The most recent survey reports are attached in Appendix 5. Figure 5-1 shows the locations of surveys relevant to the Proposed Change and Figure 5-2 shows flora and vegetation survey sites in the western portion of the Development Envelope.

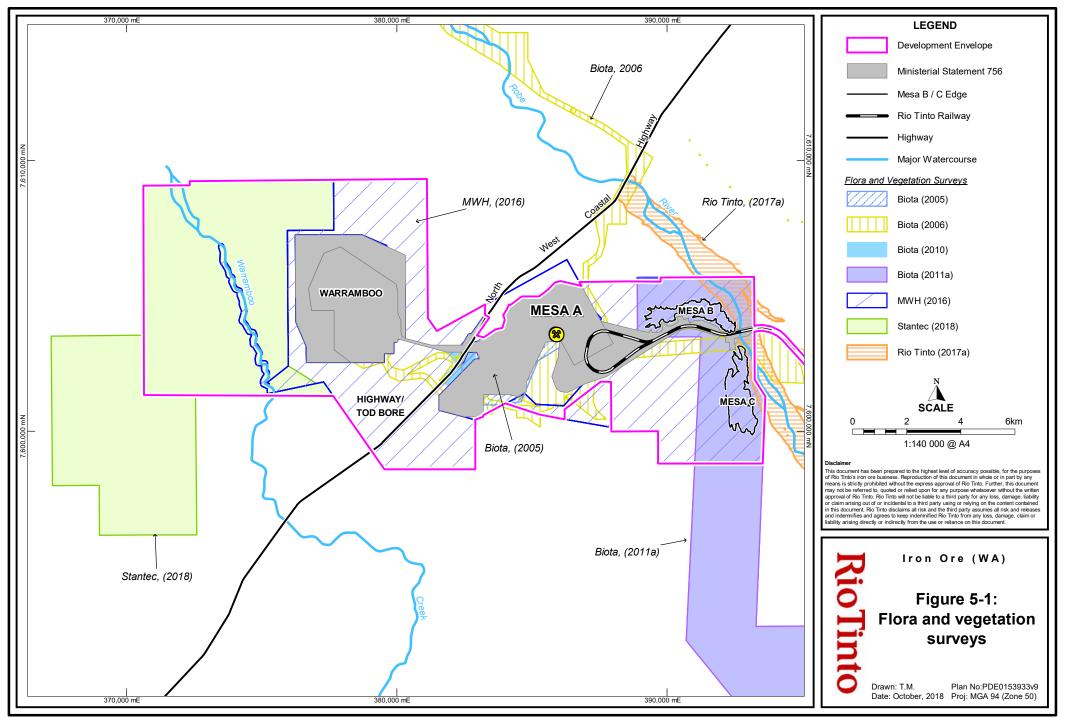
Table 5-2: Summary of supporting flora and vegetation studies

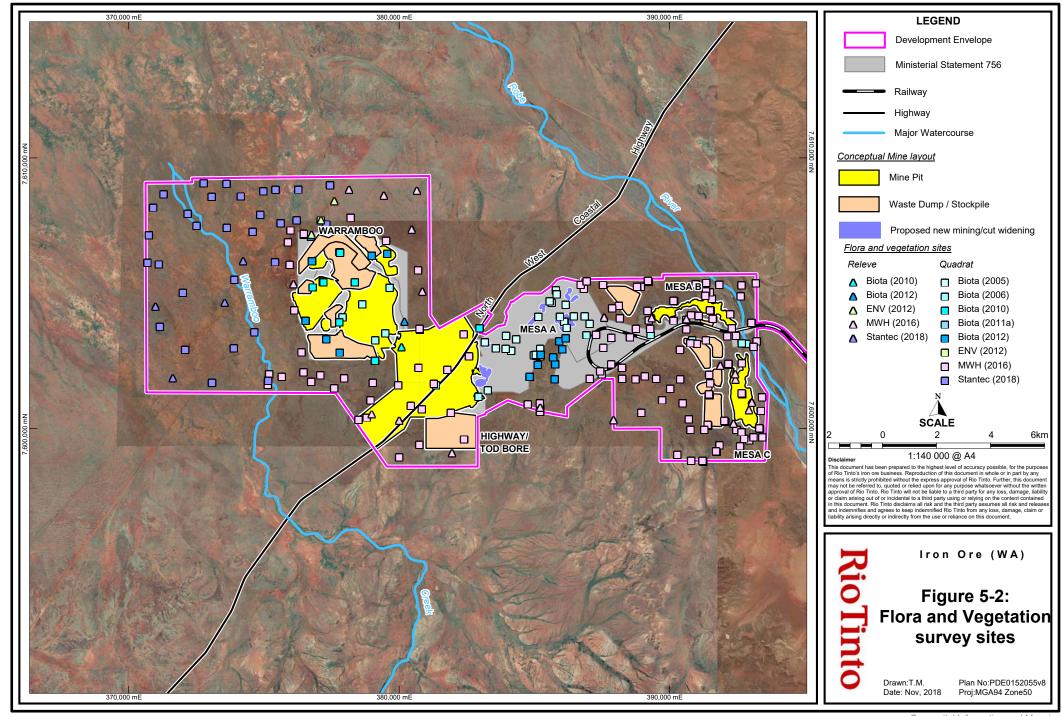
Report	Summary	Survey date
Flora and vegetation assessment Proposed Warramboo Borefield Area Stantec (2018)	A flora and vegetation survey of the Warramboo borefield was undertaken, including review of aerial photography, review of previous mapping, and sampling of quadrats and relevés, mapping of vegetation types, targeted searches for conservation significant flora, vegetation condition assessment and identification of introduced species.	May 2016
Assessment of Groundwater Dependent Vegetation distribution on the Robe River – Targeted Riparian Vegetation Survey – Stage 1 Rio Tinto (2017a)	A survey of Groundwater Dependent Vegetation as an indicator for the presence of terrestrial GDEs. The survey mapped the nature and distribution of Robe River Groundwater Dependent Vegetation, including obligate phreatophytic vegetation communities, assessed significance of the vegetation and interpreted sensitivity to hydrological change.	December 2016 and January 2017
Level 2 Flora and vegetation survey: Mesa B-C, Warramboo BWT, Highway to Tod Bore and Mesa A extension MWH (2016)	A level 2 flora and vegetation survey was conducted across various locations in the western portion of the Development Envelope. The survey included quadrats, relevés, mapping of vegetation units, targeted searches for conservation significant flora, vegetation condition assessment and identification of introduced species.	June and September 2015
Desktop Flora, Vegetation and Fauna Habitat Assessment at Robe Valley Native Vegetation Clearing Permit – Supporting Report Eco Logical Australia (2015)	A desktop assessment to summarise vegetation, flora and fauna assessments in the Robe Valley was undertaken covering a 3,723.5 ha area to address the 10 Clearing Principles to support a Native Vegetation Clearing Permit application process.	May 2015
Warramboo Extension Section 45C Biological Assessment Biota (2012a)	A biological survey of the Warramboo Mine extension area, including a desktop review and a flora and vegetation field survey. The field survey included sampling of quadrats, vegetation mapping and description of vegetation types.	May 2012

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Report	Summary	Survey date
Flora, vegetation and fauna assessment of the Warramboo/Yarraloola access track ENV (2012)	A single season Level 2 Flora and Vegetation assessment and a Level 1 Fauna assessment of Warramboo/Yarraloola access track was undertaken. The survey included vegetation condition mapping, sampling of quadrats, list of vascular plant species present, targeted surveys for Threatened and Priority Flora, Declared Rare Flora (DRF), Threatened Ecological Communities (TECs), Priority Ecological Communities (PECs) and declared and environmental weeds. It also included a review of the survey area to determine conservation significant fauna presence.	July 2012
Baseline Flora and Vegetation Assessment of Robe Valley Mesas (Mesas B, C, D, E, F, H and I) Biota (2011a)	A baseline flora and vegetation survey was conducted including quadrats and relevés of representative areas, mapping of vegetation types and opportunistic records of Priority Flora and weeds.	October 2010
A Vegetation and Flora Survey of Warramboo Summary Report Biota (2010a)	A flora and vegetation survey was conducted in the Warramboo area. This included database searches, review of relevant reports, sampling of quadrats, description and mapping of vegetation types, opportunistic searches for Priority Flora and weeds.	August 2009
A vegetation and flora survey of the proposed Mesa A Transport Corridor, Warramboo Deposit and Yarraloola Borefield Biota (2006a)	A flora and vegetation survey of the Mesa A Transport Corridor, Warramboo Deposit and Yarraloola borefield. The survey included quadrats, mapping of vegetation types and systematic searches for DRF across the entire area and opportunistic records of weed species.	July and September 2005
Vegetation and Flora Survey of Mesa A and G, near Pannawonica Biota (2005a)	A baseline flora and vegetation survey of Mesa A and G was conducted and included a review of other previous botanical work conducted at Mesa A. The survey included survey of drill lines and quadrats on both Mesa A and Mesa G and identified vegetation types, Priority Flora and introduced species.	August 2003 and May 2004

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5.4.2 Regional context

The Interim Biogeographical Regionalisation for Australia (IBRA) Version 7 recognises 89 geographically distinct bioregions based on common climate, geology, landform, native vegetation and species information. The 89 bioregions are further defined into 419 subregions, which are more localised and homogenous geomorphological units within each bioregion.

The Revised Proposal is located within the Pilbara IBRA bioregion, in the north of Western Australia. The Pilbara bioregion is divided into four subregions which include Chichester, Roebourne, Fortescue Plains, and Hamersley. The western portion of the Development Envelope lies within the Hamersley (PIL03) and Roebourne (PIL04) subregions.

The Development Envelope lies within the Eremaean Botanical Province (Beard 1975a) and intersects ten vegetation units defined by Beard (1975a, 1975b), as follows:

- Hammersley 82
- Hammersley 609
- Onslow Coastal Plain 600
- Onslow Coastal Plain 604
- Onslow Coastal Plain 605
- Stuart Hills 29
- Stuart Hills 93
- Stuart Hills 583
- Stuart Hills 603
- Stuart Hills 609.

Each vegetation unit has at least 98% of their pre-European extent remaining.

5.4.3 Vegetation units

A total of 76 vegetation units have been mapped in the western portion of the Development Envelope (Figure 5-3; Table 5-3). Some of the surveys undertaken in the western portion of the Development Envelope overlap one another therefore an amalgamation exercise was undertaken to generate a consolidated set of vegetation mapping and associated vegetation unit descriptions. The vegetation unit descriptions generally align with MWH (2016, 2018) which supersede the previous Biota work. The Rio Tinto (2017a) riparian vegetation mapping is much finer in scale, comprising a small area of the western portion of the Development Envelope and was therefore excluded from the broader list of vegetation units. However, this finer scale mapping has been considered in relation to the assessment of impacts to obligate phreatophytic vegetation (Section 5.6.2).

The dominant vegetation units represented by >500 ha each within the western portion of the Development Envelope are as follows:

- AbAanAatTw Acacia bivenosa, Acacia ancistrocarpa, Acacia atkinsiana tall to mid sparse shrubland over *Triodia wiseana* mid open hummock grassland (1,949 ha)
- **AatCtTw** *Acacia atkinsiana* tall to mid open shrubland over *Corchorus tectus* low sparse shrubland over *Triodia wiseana* hummock grassland (936 ha)

- AanAbAsyTP Acacia ancistrocarpa and Acacia bivenosa tall to mid sparse shrubland with occasional Acacia synchronicia mid shrubs over Triodia sp.
 Peedamulla (A.A. Mitchell PRP 1636) mid open hummock grassland (868 ha)
- CcAsyAanTe Corymbia candida isolated low trees over Acacia synchronicia and Acacia ancistrocarpa tall sparse to isolated shrubland over Triodia epactia mid open hummock grassland (755 ha)
- CcAanAsyTe Corymbia candida isolated low trees over Acacia synchronicia and Acacia ancistrocarpa tall sparse to isolated shrubland over Triodia epactia mid open hummock grassland (610 ha)
- AatAanCtTw Acacia atkinsiana and Acacia ancistrocarpa mid to low open to sparse shrubland over Corchorus tectus low open to sparse shrubland over Triodia wiseana sparse hummock grassland (592 ha)
- AanAiAatAbTP Acacia ancistrocarpa, Acacia inaequilatera, Acacia atkinsiana and Acacia bivenosa tall to mid sparse shrubland over Triodia sp. Peedamulla (A.A. Mitchell PRP 1636) mid open to sparse hummock grassland (581 ha)
- AatAiAarAbTw Acacia atkinsiana, Acacia inaequilatera (Acacia arida) tall open shrubland over Acacia bivenosa open shrubland over Triodia wiseana hummock grassland (535 ha).

Table 5-3: Description of vegetation units

Vegetation Unit	Vegetation Description	Number of quadrats surveyed	Comment
AanAbAsyTe	Acacia ancistrocarpa, Acacia bivenosa and Acacia synchronicia tall to mid open/sparse shrubland over <i>Triodia epactia</i> open hummock grassland	4	
AanAbAsyTP	Acacia ancistrocarpa and Acacia bivenosa tall to mid sparse shrubland with occasional Acacia synchronicia mid shrubs over Triodia sp. Peedamulla (A.A. Mitchell PRP 1636) mid open hummock grassland	4	
AanAbSspTe	Acacia ancistrocarpa and Acacia bivenosa mid open shrubland over Sida sp. Pilbara (A.A. Mitchell PRP 1543) low sparse shrubland over Triodia epactia open hummock grassland.	6	
AanAiAatAbTP	Acacia ancistrocarpa, Acacia inaequilatera, Acacia atkinsiana and Acacia bivenosa tall to mid sparse shrubland over <i>Triodia</i> sp. Peedamulla (A.A. Mitchell PRP 1636) mid open to sparse hummock grassland	3	
AanAsyAteTwTe	Acacia ancistrocarpa, Acacia synchronicia and Acacia tetragonophylla mid open to sparse shrubland over <i>Triodia wiseana</i> and/or <i>Triodia epactia</i> hummock grassland to open hummock grassland.	8	
AanAsyTe	Acacia ancistrocarpa and Acacia synchronicia mid sparse shrubland over Triodia epactia open to sparse hummock grassland.	4	
AarAbTw	Acacia arida and Acacia bivenosa mid open shrubland over Triodia wiseana hummock grassland	5	
AarTw	Acacia arida mid open shrubland over Triodia wiseana hummock grassland	10	

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Vegetation Unit	Vegetation Description	Number of quadrats surveyed	Comment
AarTwTRR	Acacia arida mid open shrubland over Triodia wiseana and Triodia sp. Robe River (M.E. Trudgen et al. MET 12367) hummock grassland	0	This unit is outside the indicative footprint and considered to be very similar to vegetation unit AarTw which had ten quadrats established in it.
AatAanCtTw	Acacia atkinsiana and Acacia ancistrocarpa mid to low open to sparse shrubland over Corchorus tectus low open to sparse shrubland over Triodia wiseana sparse hummock grassland	3	
AatAbAanTl	Acacia atkinsiana, Acacia bivenosa and Acacia ancistrocarpa tall to mid, open to sparse shrubland over <i>Triodia lanigera</i> hummock grassland to open hummock grassland	2	This unit was mapped in 2015 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia.
AatAiAarAbTw	Acacia atkinsiana, Acacia inaequilatera tall open shrubland over Acacia arida, Acacia bivenosa open shrubland over Triodia wiseana hummock grassland	11	
AatCtTw	Acacia atkinsiana tall to mid open shrubland over Corchorus tectus low sparse shrubland over Triodia wiseana hummock grassland	6	Four of the quadrat areas had been recently burned.
AbAanAatTw	Acacia bivenosa, Acacia ancistrocarpa, Acacia atkinsiana and Acacia arida mid open to sparse shrubland over Triodia wiseana hummock grassland	26	
AbAanAiTw	Acacia inaequilatera scattered tall shrubs over Acacia ancistrocarpa, Acacia bivenosa open shrubland to shrubland over Triodia wiseana hummock grassland	10	
AbAanAsyTw	Acacia bivenosa, Acacia ancistrocarpa and Acacia synchronicia tall to mid sparse shrubland over <i>Triodia wiseana</i> mid open hummock grassland	3	

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Vegetation Unit	Vegetation Description	Number of quadrats surveyed	Comment
AbTw	Acacia bivenosa mid sparse to open shrubland over Triodia wiseana hummock grassland	12	
AiAaAbTw	Acacia inaequilatera scattered tall shrubs over Acacia ancistrocarpa, Acacia bivenosa open shrubland to shrubland over Triodia wiseana hummock grassland	11	
AiAbTw	Acacia inaequilatera scattered tall shrubs over Acacia bivenosa scattered low shrubs over Triodia wiseana hummock grassland	7	
AsyAbAanTw	Acacia synchronicia, Acacia bivenosa and Acacia ancistrocarpa low to mid sparse shrubland over <i>Triodia wiseana</i> open hummock grassland	3	
AsyAbTlo	Acacia synchronicia, Acacia bivenosa open shrubland over Triodia longiceps hummock grassland	0	This unit was mapped in 2005 based on mapping notes, with an extent of 2.6 ha all of which is outside the indicative footprint.
АхВр	Acacia xiphophylla mid isolated shrubs over Brachyachne prostrata and Sclerolaena costata open herbland with Triodia epactia isolated hummock grasses	2	This unit was mapped in 2015 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia.
AxSaoEf	Acacia xiphophylla tall sparse shrubland over Senna artemisioides subsp. oligophylla mid sparse shrubland over Eriachne flaccida mid tussock grassland	4	
AxTe	Acacia xiphophylla tall open shrubland over Triodia epactia open hummock grassland	5	
AxTeCHfEb	Acacia xiphophylla tall open shrubland over Triodia epactia scattered hummock grasses over Chrysopogon fallax, Eriachne benthamii scattered tussock grasses	0	This unit was described from two relevés. The mapped extent of this unit is approximately 0.5 ha and is entirely within the western portion of the Development Envelope approved under Ministerial Statement 756.
AxTP ¹	Acacia xiphophylla tall open to sparse shrubland over <i>Triodia</i> sp. Peedamulla (A.A. Mitchell PRP 1636) mid open hummock grassland	5	

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Vegetation Unit	Vegetation Description	Number of quadrats surveyed	Comment
AxTw	Acacia xiphophylla tall open to sparse shrubland over Triodia wiseana open hummock grassland	6	
CcAaAbAsyTeTw	Corymbia candida scattered low trees over Acacia ancistrocarpa, Acacia bivenosa, Acacia synchronicia open shrubland over Triodia epactia, Triodia wiseana hummock grassland	4	
CcAanAbTe	Corymbia candida low open woodland over Acacia ancistrocarpa and Acacia bivenosa tall to mid open to sparse shrubland over Triodia epactia with occasional Triodia wiseana hummock grassland to open hummock grassland	13	
CcAanAiAsyTe	Corymbia candida low open woodland over Acacia ancistrocarpa, Acacia inaequilatera and Acacia synchronicia mid sparse shrubland over Triodia epactia hummock to open hummock grassland	2	This unit was mapped in 2015 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia.
CcAanAsyTe	Corymbia candida isolated low trees over Acacia synchronicia and Acacia ancistrocarpa tall sparse to isolated shrubland over Triodia epactia mid open hummock grassland	5	
CcAanTe	Corymbia candida isolated patches of low trees over Acacia ancistrocarpa mid sparse shrubland over Triodia epactia open hummock grassland with occasional Triodia sp. Peedamulla (A.A. Mitchell PRP 1636)	4	
CcAarCAoTeCHf	Corymbia candida subsp. candida scattered trees over Acacia arida, Cassia oligophylla open shrubland over Triodia epactia hummock grassland and Chrysopogon fallax scattered tussock grasses	1	The mapped extent of this unit is entirely within the western portion of the Development Envelope approved under Ministerial Statement 756.

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Vegetation Unit	Vegetation Description	Number of quadrats surveyed	Comment
CcAatTtTl	Corymbia candida low open woodland over Acacia atkinsiana and Acacia inaequilatera tall shrubland over Triodia lanigera open hummock grassland and Themeda triandra open tussock grassland	2	This unit was mapped in 2015 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia. The mapped extent of this unit is approximately 6 ha.
CcAlTe	Corymbia candida subsp. candida scattered low trees over Acacia ligulata scattered shrubs over Triodia epactia very open hummock grassland	2	This unit was mapped in 2012 and 2015 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia. Mapping notes were also used to describe the unit in the 2012 survey (Biota 2012a).
			The mapped extent of this unit is entirely within the western portion of the Development Envelope approved under Ministerial Statement 756.
CcAsyAanAssTe	Corymbia candida isolated low trees over Acacia synchronicia, Acacia ancistrocarpa and Acacia sclerosperma subsp. sclerosperma tall to mid sparse shrubland over Triodia epactia sparse to open hummock grassland	7	
CcAsyAanTe	Corymbia candida isolated low trees over Acacia synchronicia and Acacia ancistrocarpa tall sparse to isolated shrubland over Triodia epactia mid open hummock grassland	12	
CcChAatAaTe	Corymbia hamersleyana, Corymbia candida scattered low trees to low open woodland over Acacia atkinsiana, Acacia ancistrocarpa scattered tall shrubs to tall open shrubland over Triodia epactia open hummock grassland	0	This unit was described from two relevés. The majority of the mapped extent of this vegetation unit is within the Mesa A MEZ.

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Vegetation Unit	Vegetation Description	Number of quadrats surveyed	Comment
CcSaTeCc	Corymbia candida subsp. candida scattered trees over Acacia ancistrocarpa tall shrubland over Acacia arida, Cassia oligophylla open shrubland over Triodia epactia hummock grassland and Chrysopogon fallax scattered tussock grasses	0	This unit is considered to have insufficient extent in the western portion of the Development Envelope (0.4 ha) to warrant quadrats. Also mapped as CcAarCAoTeCHf from one quadrat.
ChAanTe	Corymbia hamersleyana low open woodland over Acacia ancistrocarpa mid sparse shrubland over Triodia epactia open hummock grassland	2	This unit was mapped in 2015 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia.
ChAarTw	Corymbia hamersleyana scattered low trees over Acacia arida shrubland over Triodia wiseana open hummock grassland	2	This unit was mapped in 2015 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia. The mapped extent of this unit in the western portion of the Development Envelope is approximately 5 ha.
ChAbAtrTw	Corymbia hamersleyana low isolated trees over Acacia bivenosa and Acacia trachycarpa mid sparse to open shrubland over Triodia wiseana hummock grassland to open hummock grassland	4	
ChAtpAanTe	Corymbia hamersleyana isolated to low open woodland over Acacia tumida var. pilbarensis and Acacia ancistrocarpa mid sparse shrubland over Triodia epactia mid open hummock grassland with occasional Chrysopogon fallax and Eragrostis cumingii tussock grassland	3	
ChAtuGwAatAarTw	Acacia tumida var. pilbarensis, Acacia pruinocarpa, Grevillea wickhamii tall open shrubland to open scrub over Acacia atkinsiana, Acacia arida open shrubland to tall open shrubland over Triodia wiseana open hummock grassland and Eriachne mucronata scattered tussock grasses	3	

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Vegetation Unit	Vegetation Description	Number of quadrats surveyed	Comment
ChAtuTwTe	Corymbia hamersleyana scattered low trees over Acacia tumida tall closed scrub over Triodia wiseana, Triodia epactia open hummock grassland	4	
ChCcAanAatAsTe	Corymbia hamersleyana and Corymbia candida low open woodland over Acacia ancistrocarpa, Acacia atkinsiana and Acacia sericophylla over tall to mid sparse shrubland over Triodia epactia open hummock grassland with occasional Triodia wiseana and Triodia sp. Peedamulla (A.A. Mitchell PRP 1636) over isolated patches of tussock grasses dominated by Chrysopogon fallax	5	
ChCcAiAatAbTe	Corymbia hamersleyana, Corymbia candida subsp. Candida scattered low trees over Acacia inaequilatera, Acacia atkinsiana, Acacia bivenosa open shrubland over Triodia epactia closed hummock grassland	4	
ChCfEcTe	Corymbia hamersleyana low open woodland over Acacia ancistrocarpa mid open shrubland over Chrysopogon fallax and Eragrostis cumingii tussock grassland over with Triodia epactia sparse hummock grassland	3	
ChCzAanAtrAtuAat TITe	Corymbia hamersleyana and Corymbia zygophylla low open woodland over Acacia ancistrocarpa, Acacia trachycarpa, Acacia tumida var. pilbarensis and Acacia atkinsiana mid open shrubland over Triodia lanigera and Triodia epactia hummock grassland	2	This unit was mapped in 2005 and 2015 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia.
ChCzAtuAtrCE	Corymbia hamersleyana, Corymbia zygophylla low open woodland over Acacia tumida (Acacia trachycarpa) tall open scrub over *Cenchrus spp.² closed tussock grassland	0	This unit was mapped in 2005 and is a degraded version of ChCzAtuAtrTe Biota (2006a) which was partially re-mapped by MWH (2016) as ChCzAanAtrAtuAatTITe, which was described from two quadrats.

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Vegetation Unit	Vegetation Description	Number of quadrats surveyed	Comment
ChElAiAatAarTw	Corymbia hamersleyana, Eucalyptus leucophloia subsp. leucophloia scattered trees over Acacia atkinsiana, Acacia inaequilatera, Acacia arida open shrubland over Triodia wiseana hummock grassland	2	This unit was mapped in 2009 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia. Two mapping notes were also used to describe this unit. The mapped extent of this unit is entirely within the western portion of the Development Envelope approved under Ministerial Statement 756.
ChGrTuTwTe	Corymbia hamersleyana low open woodland over Gossypium robinsonii tall sparse shrubland over Tephrosia uniovulata and Hibiscus sturtii var. campylochlamys low sparse shrubland over Triodia wiseana and Triodia epactia open hummock grassland	5	
ChGwAtuAiTw	Corymbia hamersleyana low open woodland over Acacia tumida var. pilbarensis, Acacia inaequilatera and Grevillea wickhamii subsp. macrodonta mid open shrubland over Triodia wiseana sparse shrubland	1	This unit was also described from one relevé.
ChGwTe	Corymbia hamersleyana low open woodland over Grevillea wickhamii subsp. Macrodonta tall sparse shrubland over Triodia epactia open hummock grassland	2	This unit was mapped in 2015 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia.
CODcAbAatTw	Codonocarpus cotinifolius scattered low trees over Acacia atkinsiana, Acacia bivenosa low open shrubs over Triodia wiseana very open hummock grassland	0	Two vegetation mapping notes were used to describe this unit. The mapped extent of this unit (6.7 ha) is entirely within the western portion of the Development Envelope approved under Ministerial Statement 756.
CzAanTl	Corymbia zygophylla low isolated trees over Acacia ancistrocarpa tall to mid open shrubland over Triodia lanigera hummock grassland	3	

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Vegetation Unit	Vegetation Description	Number of quadrats surveyed	Comment
CzAtGeTs	Corymbia zygophylla scattered low trees over Acacia tumida var. pilbarensis, Grevillea eriostachya high shrubland over Triodia schinzii hummock grassland	18	
CzEf	Corymbia zygophylla scattered low trees over Acacia tumida var. pilbarensis, Grevillea eriostachya high shrubland over Triodia schinzii hummock grassland	2	This unit was mapped in 2015 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia.
EcAanAtrAbAtuTe	Eucalyptus camaldulensis subsp. refulgens low open woodland over Acacia ancistrocarpa, Acacia trachycarpa, Acacia bivenosa and Acacia tumida var. pilbarensis tall to mid open shrubland over Triodia epactia open to sparse hummock grassland	2	This unit was mapped in 2015 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia. This unit has been subsequently described as EcrAtAanTe from five quadrats.
EcCcAanTe	Eucalyptus camaldulensis subsp. refulgens and Corymbia candida low open woodland over Acacia ancistrocarpa mid open shrubland over Triodia epactia open hummock grassland	1	This unit was also described from transects and mapping notes. This unit has been subsequently described as EcrAtAanTe from five quadrats.
EcEvMgAtrCv	Eucalyptus camaldulensis subsp. refulgens and Eucalyptus victrix low open woodland over Melaleuca glomerata and Acacia trachycarpa tall to mid open shrubland over Cyperus vaginatus sparse sedgeland	5	
EcrAtAanTe	Eucalyptus camaldulensis subsp. refulgens mid open woodland to isolated mid trees over Acacia trachycarpa and Acacia ancistrocarpa tall open shrubland over Triodia epactia mid open hummock grassland	5	

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Vegetation Unit	Vegetation Description	Number of quadrats surveyed	Comment
EcrEvCcAtAssTe	Eucalyptus camaldulensis subsp. refulgens, Eucalyptus victrix and Corymbia candida mid to low woodland over Acacia trachycarpa and Acacia sclerosperma subsp. sclerosperma tall to mid sparse shrubland over Triodia epactia open hummock grassland over *Cenchrus ciliaris², Eulalia aurea and Eriachne benthamii sparse tussock grassland	3	
ElAarAbAtuTwEm	Eucalyptus leucophloia subsp. leucophloia low open woodland over Acacia arida, Acacia bivenosa and Acacia tumida var. pilbarensis tall to mid open shrubland over Triodia wiseana open hummock grassland and Eriachne mucronata sparse tussock grassland	2	This unit was mapped in 2015 to meet EPA Guidance Statement No. 51 (2004) Terrestrial Flora and Vegetation Surveys for Environmental Impact Assessment in Western Australia.
ElAarTw	Eucalyptus leucophloia subsp. leucophloia low open woodland over Acacia arida low open shrubland over Triodia wiseana open hummock grassland	8	
ElAatAarTw	Eucalyptus leucophloia scattered low trees over Acacia atkinsiana (Acacia arida) open shrubland to tall shrubland over Triodia wiseana hummock grassland	3	
ElAatAtuGwTw	Eucalyptus leucophloia subsp. leucophloia low woodland over Acacia atkinsiana, Acacia tumida, Grevillea wickhamii tall shrubland over Triodia wiseana hummock grassland	1	This unit was mapped in 2005, 2009 and 2012. One relevé and mapping notes were also used to describe this unit.
EIAbAsyTw	Eucalyptus leucophloia subsp. leucophloia low open woodland over Acacia bivenosa and Acacia synchronicia mid sparse shrubland over Triodia wiseana hummock grassland	3	
EIAiAbTw	Eucalyptus leucophloia scattered low trees over Acacia inaequilatera scattered tall shrubs over Acacia bivenosa scattered shrubs to open shrubland over Triodia wiseana hummock grassland	0	This unit was re-mapped by MWH (2016) as EIAbAsyTw which has three quadrats.

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Vegetation Unit	Vegetation Description	Number of quadrats surveyed	Comment
ElAprAatAarTw	Eucalyptus leucophloia scattered low tress over Acacia pruinocarpa scattered tall shrubs over Acacia atkinsiana, Acacia arida shrubland over Triodia wiseana open hummock grassland	0	The mapped extent of this unit (0.8 ha) is entirely within the western portion of the Development Envelope approved under Ministerial Statement 756.
EIAtuAbTwERIm	Eucalyptus leucophloia scattered low trees over Acacia pruinocarpa, Acacia atkinsiana tall open shrubland over Triodia wiseana open hummock grassland	2	The mapped extent of this unit (37.1 ha) is entirely within the western portion of the Development Envelope approved under Ministerial Statement 756.
ElAtuTw	Eucalyptus leucophloia subsp. leucophloia low open woodland over Acacia tumida var. pilbarensis tall open shrubland over Triodia wiseana sparse hummock grassland	0	This unit was described from four relevés and was recorded from five small areas (extent between 0.2 ha and 2.2 ha).
ElCcAtuAarTw	Eucalyptus leucophloia subsp. leucophloia, Corymbia candida subsp. candida scattered low trees over Acacia tumida scattered tall shrubs to tall open shrubland over Acacia arida scattered shrubs over Triodia wiseana scattered hummock grasses	1	The mapped extent of this unit (4.4 ha) is entirely within the western portion of the Development Envelope approved under Ministerial Statement 756.
EvCcAtpAccAanEb	Eucalyptus victrix and Corymbia candida mid to low open woodland with occasional Eucalyptus camaldulensis subsp. refulgens over Acacia tumida var. pilbarensis, Acacia colei var. colei and Acacia ancistrocarpa tall sparse shrubland over Eriachne benthamii, *Cenchrus ciliaris², Eulalia aurea and Dichanthium fecundum mid tussock grassland	7	

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Vegetation Unit	Vegetation Description	Number of quadrats surveyed	Comment
R	River or creek beds	Not applicable	
Те	Triodia epactia very open hummock grassland	0	The mapped extent of this unit in the western portion of the Development Envelope is 8.6 ha and is described from a mapping note. The extent of this unit is entirely within the western portion of the Development Envelope approved under Ministerial Statement 756.

¹ This vegetation unit was initially recorded as including *Triodia pungens*. Previously *Triodia epactia* and *Triodia pungens* were used inter-changeably. *Triodia pungens* is now generally considered to occur in the east Pilbara.

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² The Proponent has well established strategies for monitoring and management of the risk of weeds at its Pilbara operations which will continue to be implemented. See Table 5-16 for information on invasive species control.

5.4.4 Significant vegetation

None of the vegetation units within the western portion of the Development Envelope are associated with any TECs currently listed under the EPBC Act or listed by the DBCA. One vegetation unit in the western portion of the Development Envelope, the Sand Sheet PEC, is considered to be of regional significance (CzAtGeTs). A total of five vegetation units in the western portion of the Development Envelope are considered to be of high local significance; two riparian units that are associated with the Robe River (ChAbAtrTw and EcEvMgAtrCv) and three units that support a restricted Priority 1 species (AanAbAsyTP, AanAiAatAbTP and CcAanTe). Twenty vegetation units in the western portion of the Development Envelope are considered to be of moderate local significance. The extent of one of these vegetation types; ElAatAtuGwTw is already approved to be cleared under MS 756 so is not considered further in the assessment of impacts in this ERD. Potential impacts to the remaining 19 vegetation units of moderate local significance are described in Section 5.6.1.1.

The vegetation units of regional significance and high local significance recorded in the western portion of the Development Envelope are summarised in Table 5-4 and are described further below. The vegetation units of moderate local significance are summarised in Appendix 6, and are generally considered to be common in the Mesa A/Warramboo area or have been recorded throughout the Robe Valley. The remaining vegetation units were considered to be of either low local significance (12 vegetation units) or negligible local significance (38 vegetation units) based on the definitions below from information presented by MWH (2016, 2017, 2018):

- High local significance: supports Threatened Flora; supports Priority 1 flora; associated with listed TECs or PECs; or associated with major drainage systems supporting riparian vegetation
- **Moderate local significance:** supports Priority 2 flora, or high density of Priority 3 flora and associated habitat; associated with local drainage systems supporting riparian vegetation; or has limited local representation
- Low significance: supports scattered records of Priority 3 flora, or locally common Priority 4 flora; associated with minor local drainage systems supporting riparian vegetation
- **Negligible significance:** supports Priority 4 flora that are regionally common; or associated with vegetation common across the Pilbara region.

Table 5-4: Significant vegetation units

Code	Description	Location	Significance			
Regional Significance						
CzAtGeTs	Corymbia zygophylla scattered low trees over Acacia tumida var. pilbarensis, Grevillea eriostachya high shrubland over Triodia schinzii hummock grassland	Adjacent to the south- eastern side of Mesa A	This vegetation unit is representative of the Sand Sheet PEC and is a habitat and vegetation type that is atypical for the locality. It is the most northern expression of this vegetation type in the Carnarvon Basin and is poorly represented in the Pilbara region and unrepresented in the reserve system. It supports many species at their northern limits or which exist as disjunct populations including species restricted to the deep red sands of this habitat type (Parks and Wildlife 2014)			
High Local Significance	9					
ChAbAtrTw	Corymbia hamersleyana low isolated trees over Acacia bivenosa and Acacia trachycarpa mid sparse to open shrubland over Triodia wiseana hummock grassland to open hummock grassland	Robe River in the vicinity of Mesas B and C	Supports riparian habitat and associated phreatophytic vegetation of the Robe River major drainage system.			
EcEvMgAtrCv	Eucalyptus camaldulensis subsp. refulgens and Eucalyptus victrix low open woodland over Melaleuca glomerata and Acacia trachycarpa tall to mid open shrubland over Cyperus vaginatus sparse sedgeland	Robe River in the vicinity of Mesas B and C	Supports riparian habitat and GDEs and associated phreatophytic vegetation of the Robe River major drainage system. It also supports <i>Rhynchosia bungarensis</i> (Priority 4).			
AanAbAsyTP	Acacia ancistrocarpa, Acacia bivenosa and Acacia synchronicia tall to mid open/sparse shrubland over Triodia epactia open hummock grassland	Warramboo borefield extension area	Supports Abutilon sp. Onslow (F. Smith s.n. 10/9/61) (Priority 1).			

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Code	Description	Location	Significance
AanAiAatAbTP	Acacia ancistrocarpa, Acacia inaequilatera, Acacia atkinsiana and Acacia bivenosa tall to mid sparse shrubland over <i>Triodia</i> sp. Peedamulla (A.A. Mitchell PRP 1636) mid open to sparse hummock grassland	Warramboo borefield extension area	Supports <i>Abutilon</i> sp. Onslow (F. Smith s.n. 10/9/61) (Priority 1).
CcAanTe	Corymbia candida isolated patches of low trees over Acacia ancistrocarpa mid sparse shrubland over Triodia epactia open hummock grassland with occasional Triodia sp. Peedamulla (A.A. Mitchell PRP 1636)	Warramboo borefield extension area	Supports <i>Abutilon</i> sp. Onslow (F. Smith s.n. 10/9/61) (Priority 1).

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5.4.4.1 Sand Sheet PEC

The Sand Sheet PEC is located immediately adjacent to the south-eastern boundary of the existing Mesa A/Warramboo Iron Ore Project. This PEC is considered to be of regional conservation significance as both a habitat and vegetation type that is atypical for the locality. It is the most northern expression of this vegetation type in the Carnarvon Basin and is poorly represented in the Pilbara region and unrepresented in the reserve system. It supports many species at their northern limits or which exist as disjunct populations including species restricted to the deep red sands of this habitat type (Parks and Wildlife 2014).

Two representations of the Sand Sheet PEC occur within the western portion of the Development Envelope; one of approximately 147 ha and one of 7 ha. These representations each have a mapped buffer of 411 ha and 136 ha respectively (Figure 5-4)⁷. Approximately 64 ha of the Sand Sheet PEC is within the area approved under MS756, of which approximately 3 ha was approved for disturbance. The remainder of the Sand Sheet is within the MEZ and will not be directly impacted.

Monitoring of the Sand Sheet PEC has been conducted since 2008 and is designed to assess the effects of mining operations from the Mesa A/Warramboo Iron Ore project on the Sand Sheet Vegetation Community in order to report on the abundance of weeds and the influence of dust, fire and clearing within the community. The monitoring involves assessing permanent flora quadrats, documenting flora species occurring in the PEC, locating flora of conservation significance, recording introduced species and mapping vegetation condition and other disturbance. The most recent results available are from 2017 (Astron 2017a; Appendix 5).

The condition of the Sand Sheet PEC vegetation in 2017 ranged from Excellent to Poor. Senescence was observed in several species in 2017, and previous years and it was particularly prevalent in *Acacia tumida* var. *pilbarensis* and *Triodia schinzii*. The presence of 'medium' or 'medium' – 'low' dust cover, introduced species (principally Buffel Grass, **Cenchrus ciliaris*), signs of cattle and historical clearing were responsible for the lower condition rating in some areas of the Sand Sheet PEC.

Vegetation condition did not generally differ between the Sand Sheet PEC and the reference areas, which were established south of the Sand Sheet PEC in 2017. The exception was dust scores which tended to be 'medium' to 'low' in the Sand Sheet PEC and 'low' to 'none' at the reference areas. Analysis of remotely sensed imagery indicated that the Sand Sheet PEC vegetation condition was overall relatively stable between 2012 and 2017; the condition of some areas had declined, while the condition of other areas had improved. The main area of decline in condition was along the north-western edge of the Sand Sheet PEC in the period 2016 to 2017. There was no clear evidence that dust loads were affecting plant health within the period of monitoring. Astron (2017a) suggested changes in soil moisture and altered surface water flow may be a driver of vegetation condition in the Sand Sheet PEC and worthy of further investigation.

Astron (2017a) noted that on-ground monitoring results showed a decline in the vegetation cover in the Sand Sheet PEC since the initial 2008 monitoring and specifically, widespread senescence of *Acacia tumida* var. *pilbarensis* (and other species) has been

.

⁷ PEC buffers are shown on the map rather than PEC boundaries as the Conditions for supply of PEC location information allow only buffers to be shown in public reports.

noted during monitoring within the Sand Sheet PEC since 2015 (Biota 2016, Astron 2017a). Analysis of the data showed that the decline in cover amongst the monitored quadrats does not appear to be associated with proximity to the mine footprint. The decline in vegetation cover corresponded with a transition within the Robe Valley from above average rainfall conditions to more average rainfall between 2012 and 2016. However, analysis of the data does not show a direct correlation between vegetation cover and rainfall in the 12 months prior to each survey. This may be due to the presence of local groundwater retaining clay layers beneath parts of the Sand Sheet which undergo periodic cycles of replenishment and decline, allowing some species intermittent access to retained water. If groundwater anomalies are at least partially driving the observed changes in the Sand Sheet PEC, then the observed inter-annual to decadal scale changes in rainfall patterns are likely to be responsible for a substantial proportion of the changes observed. In addition, altered surface water flow patterns and altered fire regime (i.e. excluding fire driven reductions in biomass) as a result of the Mesa A/Warramboo Iron Ore Project may have contributed to the observed decline in vegetation cover. Monitoring conducted in 2016 following above average rainfall in the four months prior to the survey noted recruitment of Acacia tumida var. pilbarensis (Biota 2016). Seedlings and saplings of Acacia tumida var. pilbarensis were also noted in the majority of monitoring quadrats in 2017 (Astron 2017a).

Buffel Grass was the only introduced species recorded during the 2017 monitoring survey. Five introduced species were recorded in the Sand Sheet PEC during the 2016 monitoring, including two species not previously recorded in the Sand Sheet PEC; Speedy Weed (*Flaveria trinervia) and Spiked Malvastrum (*Malvastrum americanum) which were both recorded along the northern boundary of the PEC close to the approved activities. It is not clear whether the approved activities contributed to these records however it is likely the increase in the number of species recorded in 2016 was due to increased monitoring effort since commencement of mining operations at the Mesa AWarramboo Iron Ore Project. Weed infestation areas in the PEC are treated by the Proponent which is the likely reason these weed species were not all recorded again in 2017. Buffel Grass is the most common introduced species, and is most prevalent in the south-east section of the PEC (Biota 2016). As Buffel Grass is known to be an aggressive competitor, the more favourable climatic conditions in 2009, 2011, 2013, 2015 and 2016 would likely have contributed to the spread of this weed within the Sand Sheet PEC (Biota 2016).

5.4.4.2 Riparian vegetation

Riparian ecosystems occur along the Robe River and along Warramboo Creek in and adjacent to the Development Envelope. The riparian vegetation in the vicinity of the Robe River includes GDEs (Figure 5-5).

GDEs are characterised by the presence of species that rely on groundwater, known as phreatophytic species. Such species only inhabit areas where they have access to groundwater in order satisfy at least some proportion of their environmental water requirements (EWR) (Eamus *et al.* 2006 in Rio Tinto 2017a). Phreatophytic species may be classified as either obligate or facultative phreatophytes depending on their reliance on groundwater. Obligate phreatophytes are species for which access to groundwater is critically important to their presence in the landscape. Facultative phreatophytes are those species that opportunistically utilise groundwater to satisfy a proportion of their EWR but, if required (i.e. during extended dry periods), may also satisfy their EWR via stored soil water reserves (Eamus *et al.* 2006 in Rio Tinto 2017a). The tree species *Melaleuca argentea* (obligate phreatophyte), *Eucalyptus camaldulensis* subsp. *refulgens*

(facultative phreatophyte) and *Eucalyptus victrix* (facultative phreatophyte or vadophyte [plants that primarily take up water only from the unsaturated soil above the water table]) are the three most common phreatophytic species within riparian systems of the Pilbara bioregion. Due to its dependence on groundwater, the obligate phreatophyte *Melaleuca argentea* is considered the best indicator of consistently shallow groundwater or permanent (perennial) surface water and as such, this species is also widely considered the best indicator of a GDE. *Eucalyptus camaldulensis* is one of the most broadly distributed Eucalyptus species in Australia and commonly occurs along ephemeral creeklines in the Pilbara.

Riparian vegetation communities associated with the Robe River in the western portion of the Development Envelope are represented by the vegetation units ChAbAtrTw and EcEvMgAtrCv as mapped by MWH (2016) and are considered to be of high local significance. Subsequent detailed mapping of the riparian vegetation of the Robe River from the North West Coastal Highway to near Pannawonica recorded *Melaleuca argentea*, *Eucalyptus camaldulensis* subsp. *refulgens* and *Eucalyptus victrix* adjacent to Mesas B and C (Figure 5-5). The detailed mapping showed that obligate phreatophytic vegetation is relatively common along the Robe River and not restricted to the area adjacent to Mesas B and C (Rio Tinto 2017a).

The pre-mining depth to groundwater along Warramboo Creek throughout the proposed zone of drawdown (Section 8.6.2) is historically approximately 7-26 m below ground level (with the depth as shallow as 7 m in the coastal plain area in the northern extent of the drawdown zone and the depth up to 26 m in the south of the drawdown extent). Warramboo Creek represents a low to moderate sized Pilbara Creek system and generally supports facultative phreatophytic vegetation. Three vegetation units as mapped by MWH (2016) (EcAanAtrAbAtuTe, EcCcAanTe, EcrAtAanTe and EcrEvCcAtAssTe) associated with Warramboo Creek in the western portion of the Development Envelope are considered to be of moderate local significance as they support the facultative phreatophytic species, *Eucalyptus camaldulensis* subsp. *refulgens*, and the facultative (and potentially vadophytic) species, *Eucalyptus victrix* (Appendix 6).

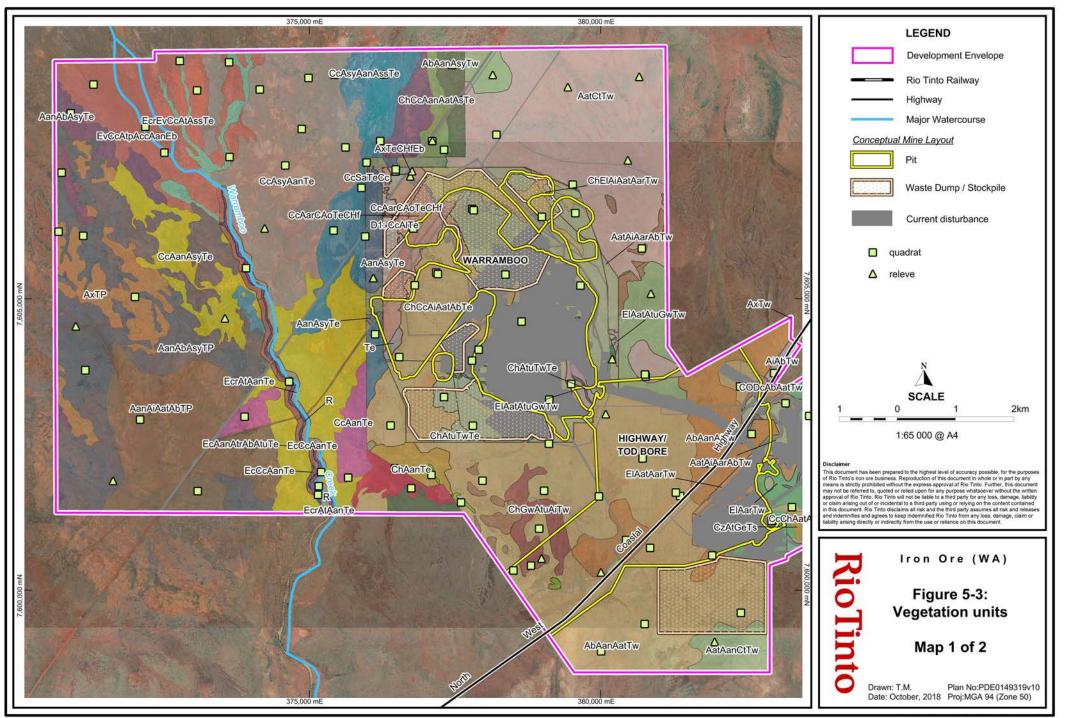
Subsequent additional mapping of the riparian vegetation along Warramboo Creek has been undertaken using high resolution aerial photography. With the advent of digital image sensors with higher resolutions and more stable colour reproduction capabilities, the high resolution aerial photography produced is increasingly recognised as able to allow species recognition. In areas such as the Pilbara where riparian over storeys are generally relatively simple, this has enabled the use of suitable aerial photography to map the distribution of key phreatophytes and delineate areas where more sensitive phreatophytes are present, dominant or co-dominant. The additional mapping of Warramboo Creek delineated five vegetation units (considered to be of moderate local significance) listed in Table 5-5 and shown in Figure 5-6 and provides further definition of, and confidence in, the distribution and extent of phreatophytic communities, particularly the extent of communities in which Eucalyptus camaldulensis subsp. refulgens is dominant or co-dominant. The vegetation units of this more detailed mapping generally align with those of the most recent flora and vegetation assessment of the Warramboo area (Stantec 2018). The more detailed mapping is used for impact assessment throughout this document.

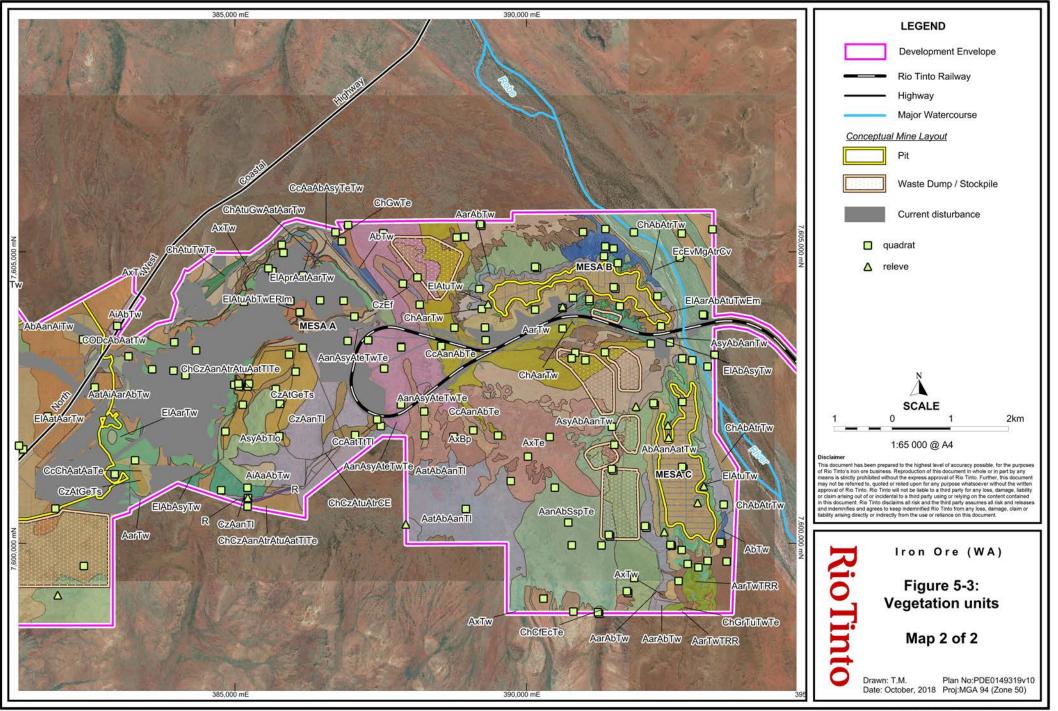
Table 5-5: Description of riparian vegetation units along Warramboo Creek (detailed mapping)

Vegetation Unit	Vegetation Description
EvCcAtpAccA	Eucalyptus victrix and Corymbia candida mid to low open woodland with scattered Eucalyptus camaldulensis subsp. refulgens, Acacia tumida var. pilbarensis, Acacia colei var. colei and Acacia ancistrocarpa tall sparse shrubland, over Eriachne benthamii, *Cenchrus ciliaris, Eulalia aurea and Dichanthium fecundum mid tussock grassland
EcrEvCcAtAs	Eucalyptus camaldulensis subsp. refulgens, Eucalyptus victrix and Corymbia candida mid to low woodland, over Acacia trachycarpa and Acacia sclerosperma subsp. sclerosperma tall to mid sparse shrubland, over Triodia epactia open hummock grassland over *Cenchrus ciliaris, Eulalia aurea and Eriachne benthamii sparse tussock grassland
EcrAtAanTe	Eucalyptus camaldulensis subsp. refulgens mid woodland over Acacia trachycarpa and Acacia ancistrocarpa tall open shrubland over Triodia epactia mid open hummock grassland
EcAanAtrAbAtuTe	Corymbia candida and Eucalyptus victrix low open woodland (with scattered Eucalyptus camaldulensis subsp. refulgens), over Acacia ancistrocarpa, Acacia trachycarpa, Acacia bivenosa and Acacia tumida var. pilbarensis tall to mid open shrubland, over Triodia epactia open to sparse hummock grassland
EcrAtAanAtTe	Eucalyptus camaldulensis subsp. refulgens mid woodland over Acacia trachycarpa, Acacia ancistrocarpa and Acacia tumida var. pilbarensis tall open shrubland over Triodia epactia mid open hummock grassland

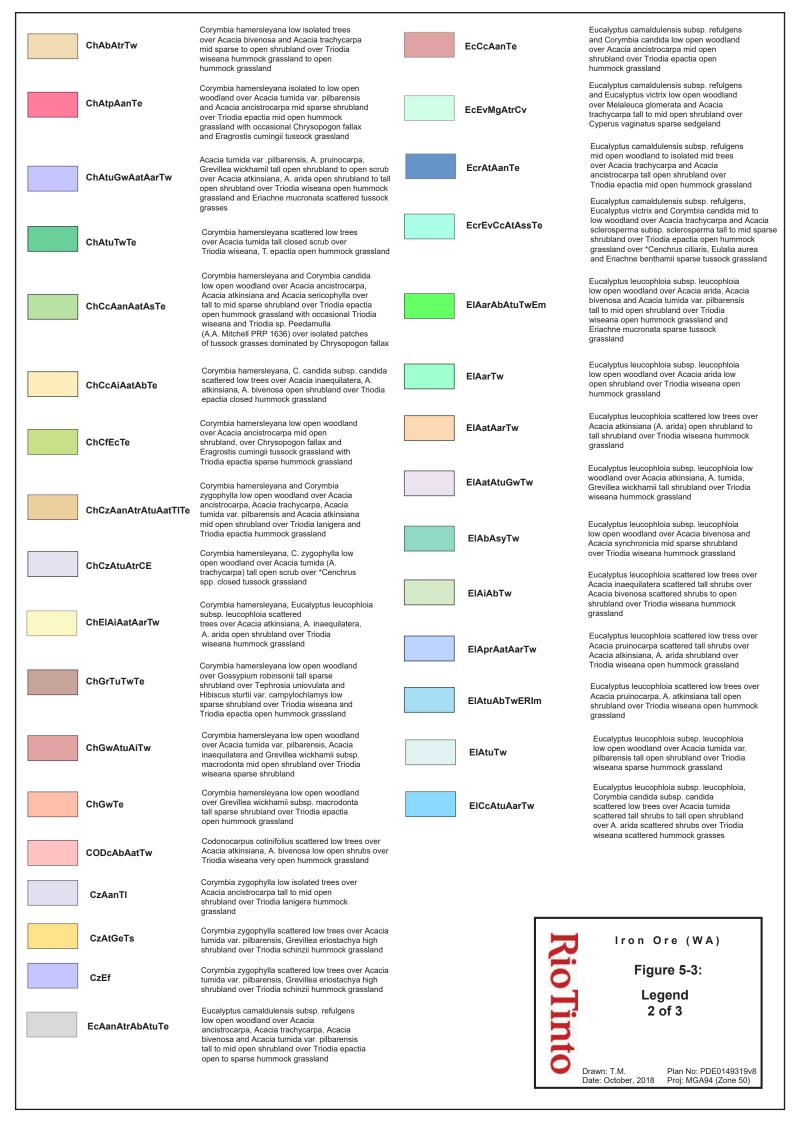
5.4.4.3 Vegetation units AanAbAsyTP, AanAiAatAbTP and CcAanTe

These vegetation units are of high local significance given they support three populations of the Priority 1 taxon *Abutilon* sp. Onslow (F. Smith s.n. 10/9/61). These vegetation types extends over 1,500 ha within the western portion of the Development Envelope (Figure 5-3) and also extend outside the Development Envelope to the north-west.





AanAb	oAsyTe	Acacia ancistrocarpa, Acacia bivenosa and Acacia synchronicia tall to mid open/sparse shrubland over Triodia epactia open hummock grassland	АхТе	Acacia xiphophylla tall open shrubland over Triodia epactia open hummock grassland
AanAb	oAsyTP	Acacia ancistrocarpa and Acacia bivenosa tall to mid sparse shrubland with occasional Acacia synchronicia mid shrubs over Triodia	AxTeCHfEb	Acacia xiphophylla tall open shrubland over Triodia epactia scattered hummock grasses over Chrysopogon fallax, Eriachne benthamii scattered tussock grasses
		sp. Peedamulla (A.A. Mitchell PRP 1636) mid open hummock grassland	AxTP	Acacia xiphophylla tall open to sparse shrubland over Triodia sp. Peedamulla (A.A. Mitchell PRP 1636) mid open hummock grassland
AanAt	oSspTe	Acacia ancistrocarpa and Acacia bivenosa mid open shrubland over Sida sp. Pilbara (A.A. Mitchell PRP 1543) low sparse shrubland over Triodia epactia open hummock grassland	AxTw	Acacia xiphophylla tall open to sparse shrubland over Triodia wiseana open hummock grassland
AanAi	AatAbTP	Acacia ancistrocarpa, Acacia inaequilatera, Acacia atkinsiana and Acacia bivenosa tall to mid sparse shrubland over Triodia sp. Peedamulla (A.A. Mitchell PRP 1636) mid	CcAaAbAsyTeTw	synchronicia open shrubland over i riodia epactia, T. wiseana hummock grassland
AanAs	syAteTwTe	open to sparse hummock grassland Acacia ancistrocarpa, Acacia synchronicia and Acacia tetragonophylla mid open to sparse shrubland over Triodia wiseana and/or Triodia epactia hummock grassland to open hummock grassland	CcAanAbTe	Corymbia candida low open woodland over Acacia ancistrocarpa and Acacia bivenosa tall to mid open to sparse shrubland over Triodia epactia with occasional Triodia wiseana hummock grassland to open hummock grassland
AanAs	syTe	Acacia ancistrocarpa and Acacia synchronicia mid sparse shrubland over Triodia epactia open to sparse hummock grassland	CcAanAiAsyTe	Corymbia candida low open woodland over Acacia ancistrocarpa, Acacia inaequilatera and Acacia synchronicia mid sparse shrubland over Triodia epactia hummock grassland
AarAb	οTw	Acacia arida and Acacia bivenosa mid open shrubland over Triodia wiseana hummock grassland		Corymbia candida isolated patches of low trees over Acacia ancistrocarpa and Acacia synchronicia
AarTw	,	Acacia arida mid open shrubland over Triodia wiseana hummock grassland	CcAanAsyTe	tall to mid sparse shrubland over Triodia epactia mid hummock grassland
AarTw	/TRR	Acacia arida mid open shrubland over Triodia wiseana and Triodia sp. Robe River (M.E. Trudgen et al. MET 12367) hummock grassland	CcAanTe	Corymbia candida isolated patches of low trees over Acacia ancistrocarpa mid sparse shrubland over Triodia epactia open hummock grassland with occasional Triodia sp. Peedamulla (A.A.Mitchell PRP 1636)
AatAa	nCtTw	Acacia atkinsiana and Acacia ancistrocarpa mid to low open to sparse shrubland over Corchorus tectus low open to sparse shrubland over Triodia wiseana sparse hummock grassland	CcAarCAoTeCHf	Corymbia candida subsp. candida scattered trees over Acacia arida, Cassia oligophylla open shrubland over Triodia epactia hummock grassland and Chrysopogon fallax scattered tussock grasses
AatAb	AanTI	Acacia atkinsiana, Acacia bivenosa and Acacia ancistrocarpa tall to mid, open to sparse shrubland over Triodia lanigera hummock grassland to open hummock grassland	CcAatTtTl	Corymbia candida low open woodland over Acacia atkinsiana and Acacia inaequilatera tall shrubland over Triodia lanigera open hummock grassland and Themeda triandra open tussock grassland
AatAiA	AarAbTw	Acacia ancistrocarpa, A. atkinsiana, A. inaequilatera tall open shrubland over A. arida, A. bivenosa open shrubland over Triodia wiseana hummock grassland	CcAlTe	Corymbia candida subsp. candida scattered low trees over Acacia ligulata scattered shrubs over Triodia epactia very open hummock grassland
AatCt	Γw	Acacia atkinsiana tall to mid open shrubland over Corchorus tectus low sparse shrubland over Triodia wiseana hummock grassland	CcAsyAanAssTe	Corymbia candida isolated low trees over Acacia synchronicia, Acacia ancistrocarpa and Acacia sclerosperma subsp. sclerosperma tall to mid sparse shrubland over Triodia
AbAar	nAatTw	Acacia bivenosa, Acacia ancistrocarpa, Acacia atkinsiana and Acacia arida mid open to sparse shrubland over Triodia wiseana hummock grassland	CcAsyAanTe	epactia sparse to open hummock grassland Corymbia candida isolated low trees over Acacia synchronicia and Acacia ancistrocarpa tall sparse to isolated shrubland over Triodia
AbAar	nAiTw	Acacia inaequilatera scattered tall shrubs over Acacia ancistrocarpa, A. bivenosa open shrubland to shrubland over Triodia wiseana hummock grassland		epactia mid open hummock grassland Corymbia hamersleyana, C. candida scattered low trees to low open woodland over Acacia
AbAar	nAsyTw	Acacia bivenosa, Acacia ancistrocarpa and Acacia synchronicia tall to mid sparse shrubland over Triodia wiseana mid open hummock grassland	CcChAatAaTe	atkinsiana, A. ancistrocarpa scattered tall shrubs to tall open shrubland over Triodia epactia open hummock grassland Corymbia candida subsp. candida scattered trees
AbTw		Acacia bivenosa mid sparse to open shrubland over Triodia wiseana hummock grassland	CcSaTeCc	over Acacia ancistrocarpa tall shrubland over A. arida, Cassia oligophylla open shrubland over Triodia epactia hummock grassland and Chrysopogon fallax scattered tussock grasses
AiAaA	ωbTw	Acacia inaequilatera scattered tall shrubs over Acacia ancistrocarpa, A. bivenosa open shrubland to shrubland over Triodia wiseana hummock grassland	ChAanTe	Corymbia hamersleyana low open woodland over Acacia ancistrocarpa mid sparse shrubland over Triodia epactia open
AiAbT	`w	Acacia inaequilatera scattered tall shrubs over A. bivenosa scattered low shrubs over Triodia wiseana hummock grassland	ChAarTw	hummock grassland Corymbia hamersleyana scattered low trees
AsyAt	oAanTw	Acacia synchronicia, Acacia bivenosa and Acacia ancistrocarpa low to mid sparse shrubland over Triodia wiseana open hummock grassland	Γ	over Acacia arida shrubland over Triodia wiseana open hummock grassland
AsyAt	oTlo	Acacia synchronicia, A. bivenosa open shrubland over Triodia longiceps hummock grassland		Figure 5.2:
АхВр		Acacia xiphophylla mid isolated shrubs over Brachyachne prostrata and Sclerolaena costata open herbland with Triodia epactia isolated hummock grasses		Figure 5-3: Legend 1 of 3
AxSao	ÞΕf	Acacia xiphophylla tall sparse shrubland over Senna artemisioides subsp. oligophylla mid sparse shrubland over Eriachne flaccida mid tussock grassland		Drawn: T.M. Plan No: PDE0149319v8 Date: October, 2018 Proj: MGA94 (Zone 50)





Eucalyptus victrix and Corymbia candida mid to low open woodland with occasional Eucalyptus camaldulensis subsp.refulgens over Acacia tumida var.pilbarensis, Acacia colei var. colei and Acacia ancistrocarpa tall sparse shrubland over Eriachne benthamii, *Cenchrus ciliaris, Eulalia aurea and Dichanthium fecundum mid tussock grassland

River or creek beds

Те

Triodia epactia very open hummock grassland



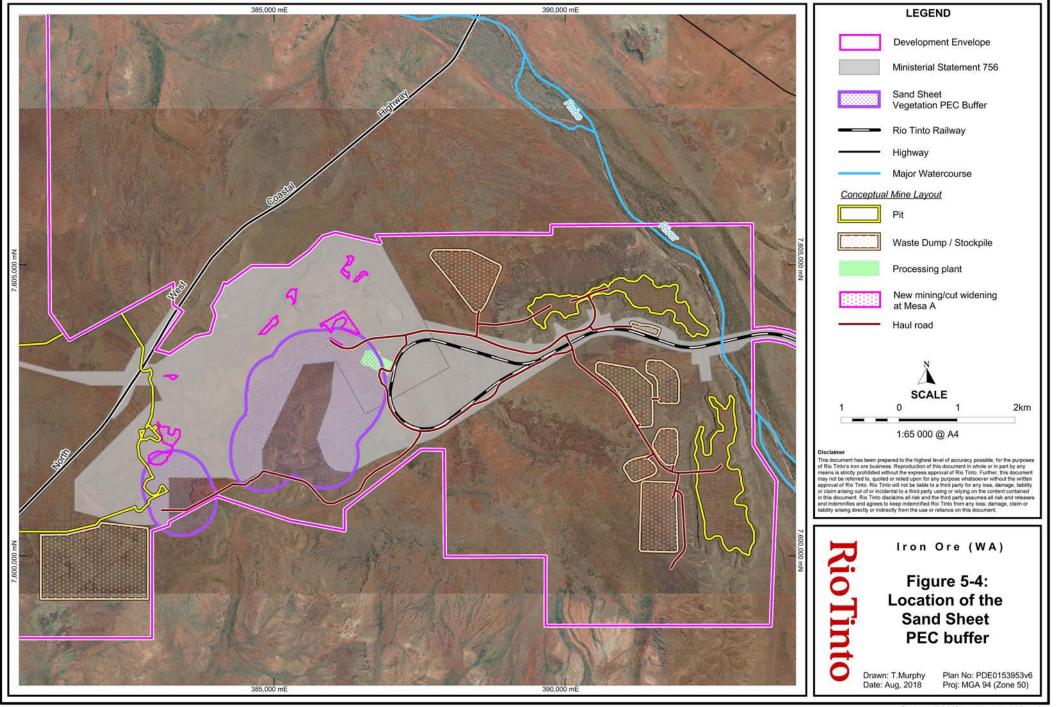
Iron Ore (WA)

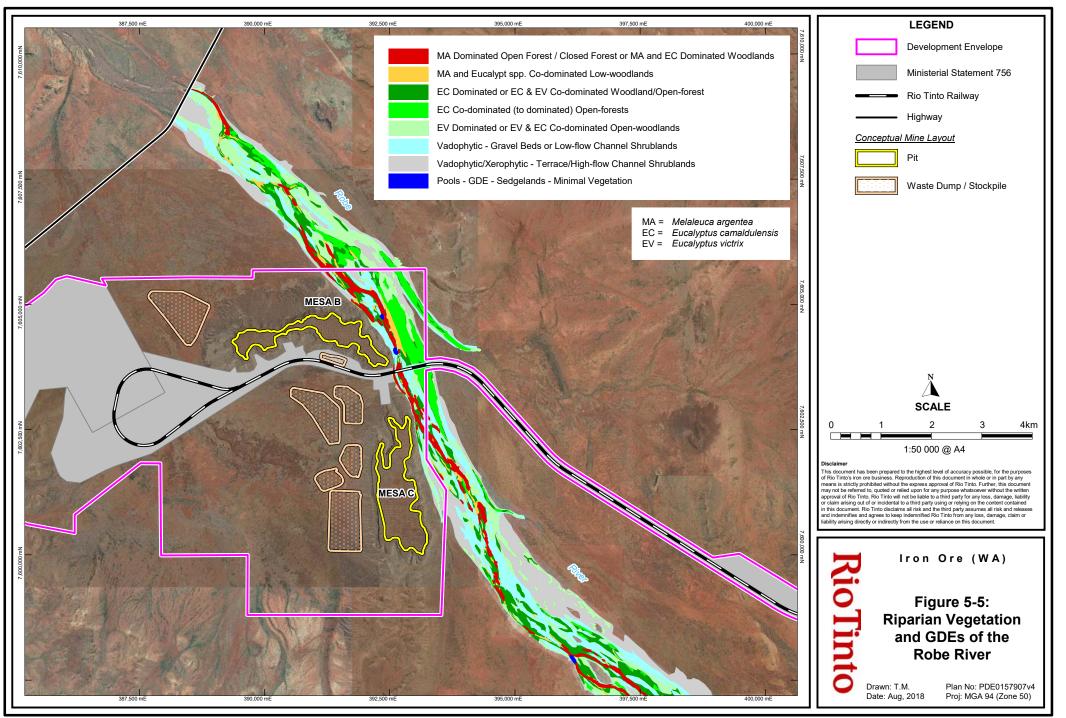
Figure 5-3:

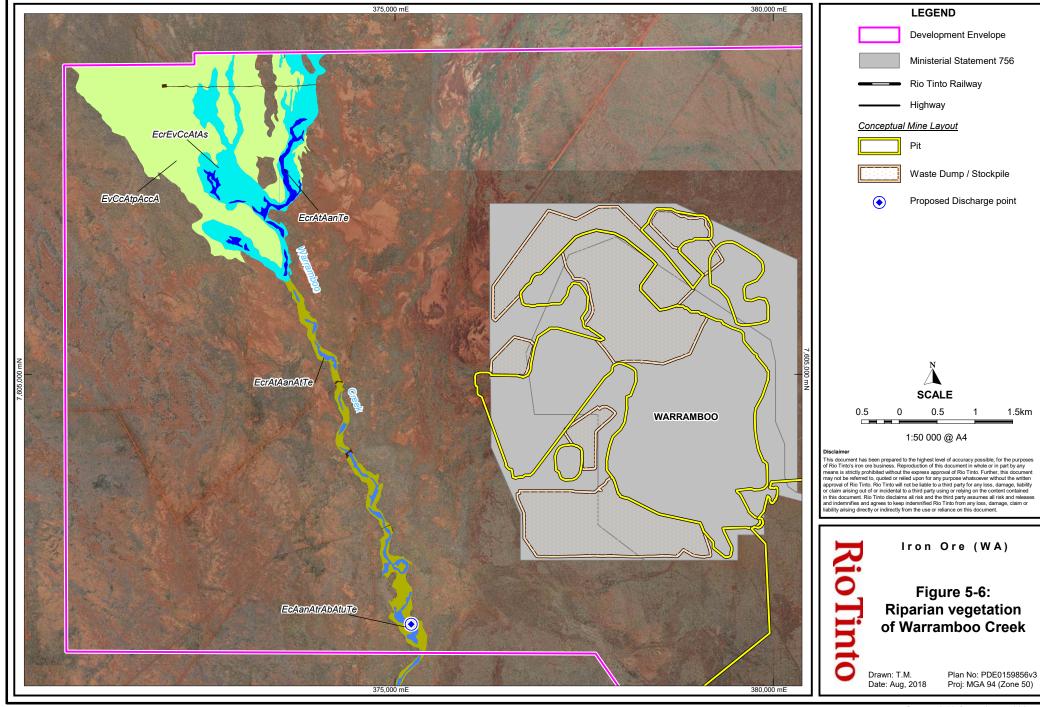
Legend 3 of 3

Drawn: T.M. Date: October, 2018

Plan No: PDE0149319v8 Proj: MGA94 (Zone 50)







5.4.5 Significant flora

A total of 392 vascular flora taxa have been recorded within the western portion of the Development Envelope, comprising 375 native flora taxa and 17 introduced flora taxa (weeds). These flora taxa represent 49 families and 143 genera. No Threatened Flora have been recorded in the western portion of the Development Envelope (MWH 2016; Stantec 2018), nor were any identified in any desktop studies as likely to occur.

Four Priority Flora species have been recorded in the western portion of the Development Envelope; these are identified in Table 5-6 and their recorded locations shown on Figure 5-7.

Table 5-6: Priority species recorded (Biota 2011a; MWH 2016; Stantec 2018).

Taxon	Conservation status	No. of individuals	Number of locations
Abutilon sp. Onslow (F. Smith s.n. 10/9/61)	Priority 1	1,241	242
<i>Triodia</i> sp. Robe River (M.E. Trudgen et al. Met 12367)	Priority 3	34,324	1,218
Goodenia nuda	Priority 4	368	67
Rhynchosia bungarensis	Priority 4	760	29

Two other taxa recorded in the western portion of the Development Envelope are considered range extensions. *Olearia stuartii* was recorded in Warramboo Creek, outside of its recorded range which includes south Pilbara, Murchison and Central Ranges. In addition, *Phyllanthus exilis* was recorded at Warramboo Creek but is more commonly recorded in the Kimberley with only scattered records in the Pilbara. An additional species recorded in the Warramboo area, *Sida platycalyx*, was not considered to be a true range extension, but rather a new population record representing a gap in the current knowledge and distribution (Stantec 2018). Therefore, *Sida platycalyx* is not considered further. Locations of *Olearia stuartii* and *Phyllanthus exilis* records are shown in Figure 5-7.

Two other taxa were recorded with anomalous features; *Abutilon* aff. *hannii* and *Tephrosia* aff. *remotiflora* (Peedamulla Form) and represent taxa that have been collected previously, but have not yet been officially assigned a scientific name or described by taxonomists (MWH 2016; Stantec 2018) (Figure 5-7, Table 5-7). The two taxa have been recorded previously from the immediate area and sporadically in the Pilbara region (MWH 2016). Both species have been recorded from a variety of habitats and do not appear to be restricted to a particular landform. Given it is likely these taxa have distributions that extend further than current records show, these species are considered unlikely to be assigned conservation significant status and therefore have not been considered further in the assessment of impacts from the Proposed Change.

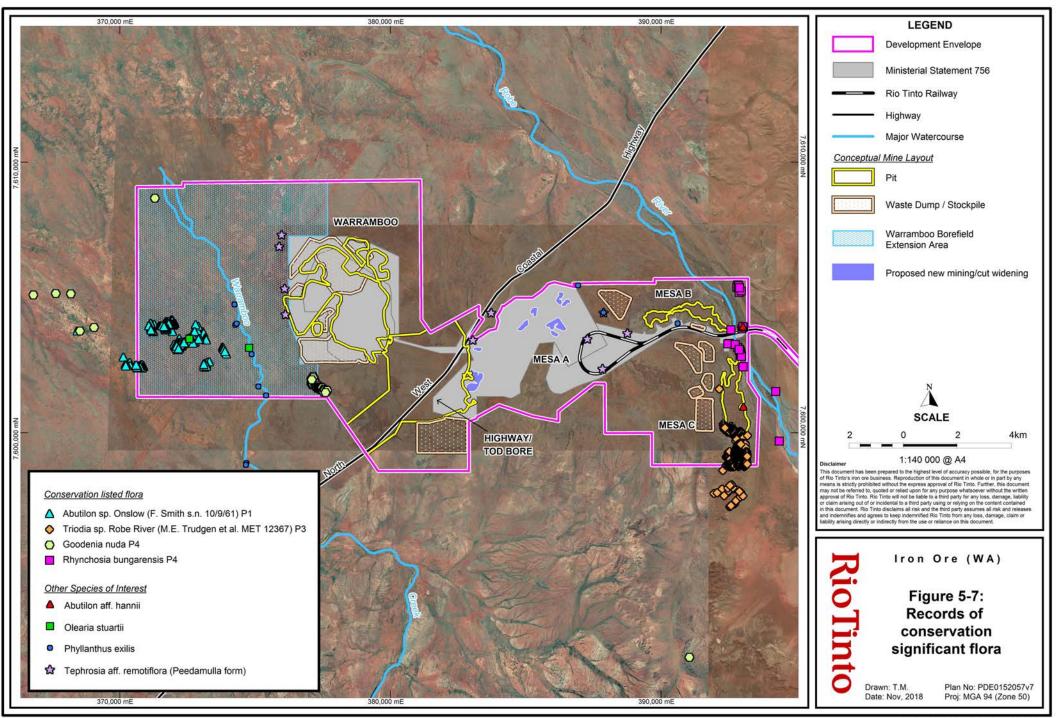


Table 5-7: Other flora species of potential interest recorded (MWH 2016; Stantec 2018)

Taxon	Nearest Known Location	Information
Olearia stuartii	185 km east	Olearia stuartii was recorded on the banks of Warramboo Creek. This species is known to occur in a wide variety of habitats including creek beds and is commonly recorded in the south Pilbara, Murchison and the Central Ranges.
Phyllanthus exilis	140 km east, north-east	Phyllanthus exilis was recorded on creek banks, flat drainage areas and floodways, which is typical for the species. The species is more common in the Kimberley region but scattered locations are present in the Pilbara.
Abutilon aff. hannii	n/a	Abutilon aff. hannii was recorded in the vicinity of Mesas B and C. Pilbara collections of this species are limited and it is likely that Abutilon aff. hannii is a distinct taxon (Mike Hislop, pers comm 21/7/2015, MWH 2016).
Tephrosia aff. remotiflora (Peedamulla form)	n/a	Tephrosia aff. remotiflora (Peedamulla form) was recorded in the vicinity of Mesas A, B and C and also in the proposed Warramboo borefield extension area, and is under consideration to be classified as a distinct taxon (Mike Hislop, pers comm 31/7/2015, MWH 2016).

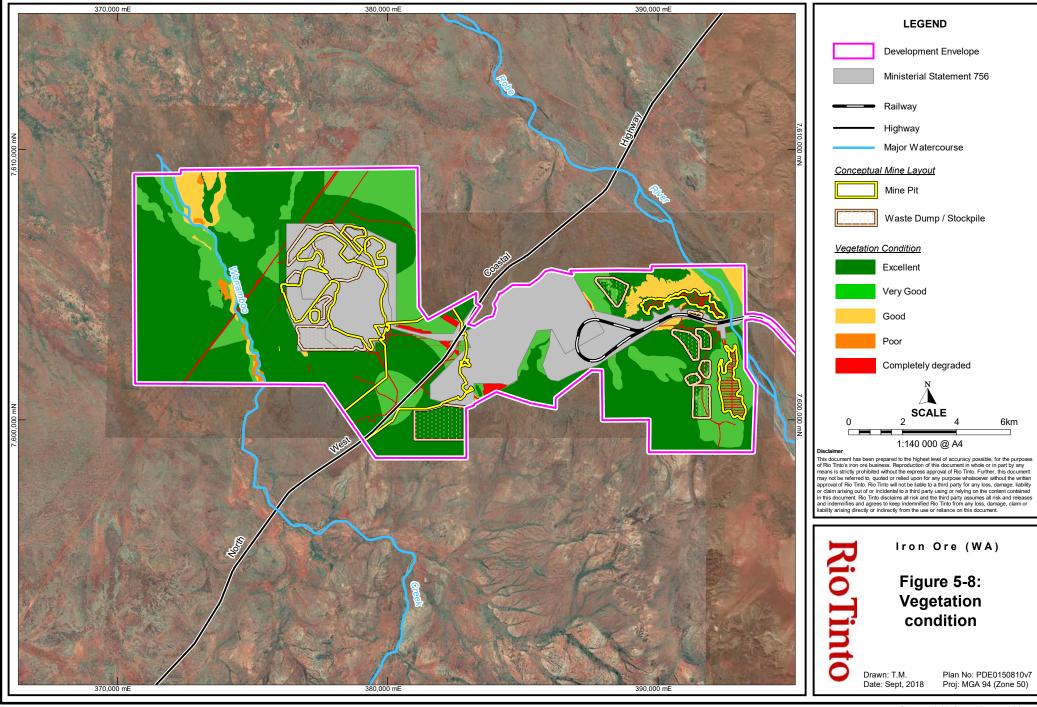
5.4.6 Vegetation condition

Vegetation within the western portion of the Development Envelope was recorded as ranging from Excellent to Completely Degraded (MWH 2016, 2017; Stantec 2018; Figure 5-8). Overall, the majority of vegetation in the western portion of the Development Envelope was in Excellent (58%) or Very Good (27%) condition. Approximately 10% of the western portion of the Development Envelope was considered to be in Completely Degraded condition. This was generally due to high weed infestation, cattle grazing and trampling, mining operations and infrastructure including rail line and previous drill pads and vehicle tracks.

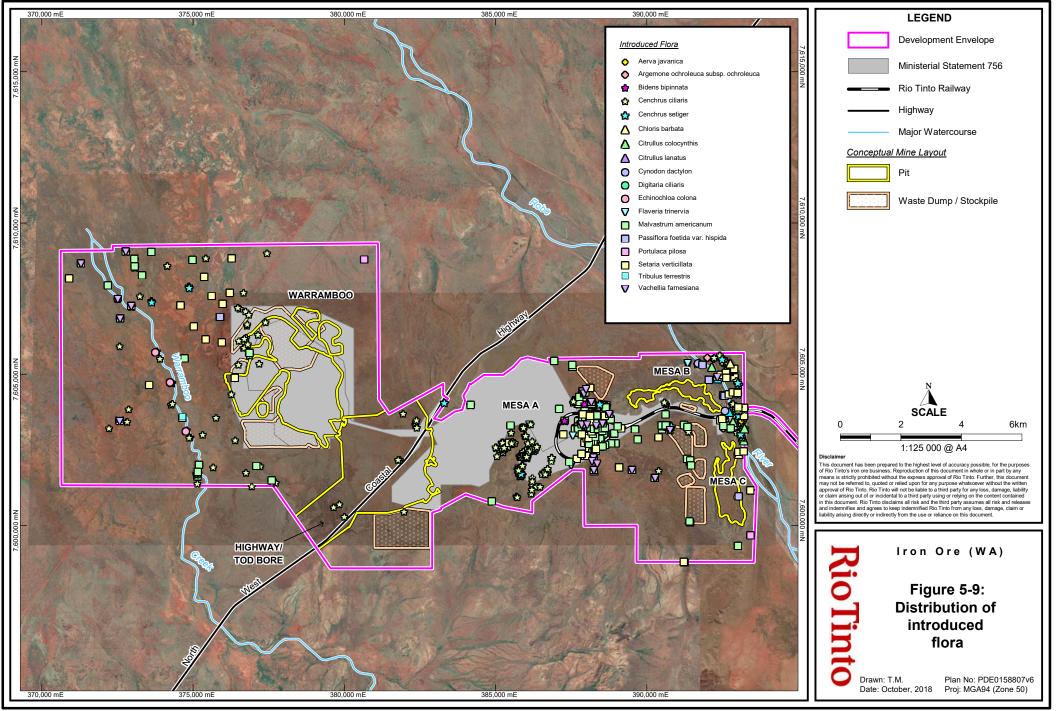
Seventeen introduced flora species have been recorded within the western portion of the Development Envelope as shown in Figure 5-9 and listed in Table 5-8. None of these are Weeds of National Significance or Declared Plant Pests. The majority of weeds recorded in the western portion of the Development Envelope were found in drainage areas, damp areas on stony plains, disturbed areas, inside and surrounding the existing rail loop, historical drilling sites and rehabilitation areas. *Cenchrus ciliaris (Buffel Grass) was the most abundant weed species, recorded across all sites, with the understorey almost replaced by this species in some locations at the southern end of Warramboo Creek (MWH 2016).

Table 5-8: Introduced flora taxa (MWH 2016; Stantec 2018)

Family	Taxon (Common Name)	Record Location
Amaranthaceae	*Aerva javanica (Kapok Bush)	Mesa B and C
Asteraceae	*Flaveria trinervia (Speedy Weed)	Mesa B and C
*Bidens bipinnata		Mesa A
*Citrullus colocynthis (Colocynth)		Mesa B and C
Cucurbitaceae	*Citrullus lanatus (Pie Melon)	Mesa B and C
Fabaceae	*Vachellia farnesiana (Mimosa Bush)	Mesa B and C, Warramboo Borefield
Malvaceae	*Malvastrum americanum (Spiked Malvastrum)	Mesa B and C, Highway to Tod Bore, Warramboo BWT, Warramboo Borefield
Papaveraceae	*Argemone ochroleuca subsp. ochroleuca (Mexican Poppy)	Mesa B and C
Passifloraceae	*Passiflora foetida var. hispida (Stinking Passion Flower)	Mesa B and C, Warramboo Borefield
	*Cenchrus ciliaris (Buffel Grass)	Mesa B and C, Highway to Tod Bore, Wararmboo BWT, Mesa A extension, Warramboo Creek, Warramboo Borefield
	*Cenchrus setiger (Birdwood Grass)	Mesa B and C, Highway to Tod Bore, Mesa A extension, Warramboo Creek, Warramboo Borefield
D	*Chloris barbata (Purpletop Chloris)	Mesa B and C
Poaceae	*Cynodon dactylon (Couch)	Mesa B
	*Digitaria ciliaris (Southern Crabgrass)	Mesa A
	*Echinochloa colona (Awnless Barnyard Grass)	Warramboo Creek, Warramboo Borefield
	*Setaria verticillata (Whorled Pigeon Grass)	Mesa B and C, Warramboo BWT, Warramboo Creek, Warramboo Borefield
Portulacaceae	*Portulaca pilosa	Mesa C and north of Warramboo BWT
Zygophyllaceae	*Tribulus terrestris	Warramboo Borefield



6km



5.5 Potential Impacts

A number of potential impacts are identified in the ESD. The potential direct, indirect and cumulative impacts identified for the Proposed Change on the basis of biological surveys and flora and vegetation assessments are described in Sections 5.5.1 to 5.5.3. The significance of these potential impacts is discussed in Section 5.5.

5.5.1 Direct impacts

Potential direct impacts of the Proposed Change to flora and vegetation have been identified as:

- · Loss of vegetation due to clearing
- Loss of conservation significant flora due to clearing.

Significant vegetation units are described in Section 5.4.4. The significant vegetation units that will potentially be impacted by clearing are presented in Table 5-9. Assessment of potential impacts to these units is provided in Section 5.6.1.

Table 5-9: Potential direct impact to significant vegetation

Code Regional signification	Significance	Extent within western portion of the Development Envelope (ha)	Proposed extent of new activities (ha)	Proposed extent of disturbance (%)
CzAtGeTs	Representative of the Sand Sheet PEC.	143	0	0
High local signif	ficance			
ChAbAtrTw	Supports riparian habitat and associated phreatophytic vegetation of the Robe River major drainage system.	88	1.5	2%
EcEvMgAtrCv	Supports riparian habitat, GDEs and associated phreatophytic vegetation of the Robe River major drainage system.	229	2	<1%
AanAbAsyTP	Supports <i>Abutilon</i> sp. Onslow (F. Smith s.n. 10/9/61) (Priority 1).	868	30	3.5%
AanAiAatAbTP	Supports Abutilon sp. Onslow (F. Smith s.n. 10/9/61) (Priority 1).	581	11	1.9%
CcAanTe	Supports <i>Abutilon</i> sp. Onslow (F. Smith s.n. 10/9/61) (Priority 1).	116	10.5	9%

Section 5.4.5 identifies the Priority Flora species recorded in the western portion of the Development Envelope. Potential direct impacts to Priority Flora species are presented in Table 5-10. Assessment of potential direct impacts to Priority Flora species is provided in Section 5.6.1.

Table 5-10: Potential direct impacts to known populations of Priority Flora

Taxon	Conservation status	No. of individuals	No. of individuals in Rio Tinto database	No. of individuals proposed to be disturbed	Proposed disturbance (% of records in the western portion of the Development Envelope)	Proposed disturbance (%of records in the Rio Tinto database)	Range on Naturemap (km)
Abutilon sp. Onslow (F. Smith s.n. 10/9/61)	Priority 1	1,241	1,284	70	6%	5%	135
<i>Triodia</i> sp. Robe River (M.E. Trudgen et al. Met 12367)	Priority 3	34,324	288,681	1,774	5%	<1%	180
Goodenia nuda	Priority 4	368	10,627	114	31%	1%	880
Rhynchosia bungarensis	Priority 4	760	12,736	38	5%	<1%	430

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5.5.2 Indirect impacts

Potential indirect impacts of the Proposed Change to flora and vegetation have been identified as:

- Loss or degradation of riparian vegetation as a result of groundwater drawdown
- Loss or degradation of riparian vegetation as a result of surface water discharge
- Degradation of vegetation due to ingress of weeds
- Degradation of vegetation due to increased dust deposition.

The vegetation units recorded in the western portion of the Development Envelope, including units associated with Warramboo Creek, are described in Sections 5.4.3 and 5.4.4. Hydrogeological modelling indicates there is limited hydraulic connectivity between the Mesa C CID Aquifer and the Robe River alluvium. Consequently, drawdown of groundwater levels within the Mesa C CID Aquifer is not expected to result in observable changes to groundwater levels within the adjacent Robe River Alluvial Aquifer.

Groundwater drawdown in the Yarraloola Aquifer beneath the ephemeral Warramboo Creek has the potential to impact vegetation units. Three potential impact zones were delineated based on depth to groundwater, available literature on facultative phreatophytes and Rio Tinto's experience with these species within the Pilbara (Section 5.6.2.1, Figure 5-10). Potential impacts to vegetation units in each of the zones were then identified based on the proposed drawdown in each zone as shown in Table 5-11.

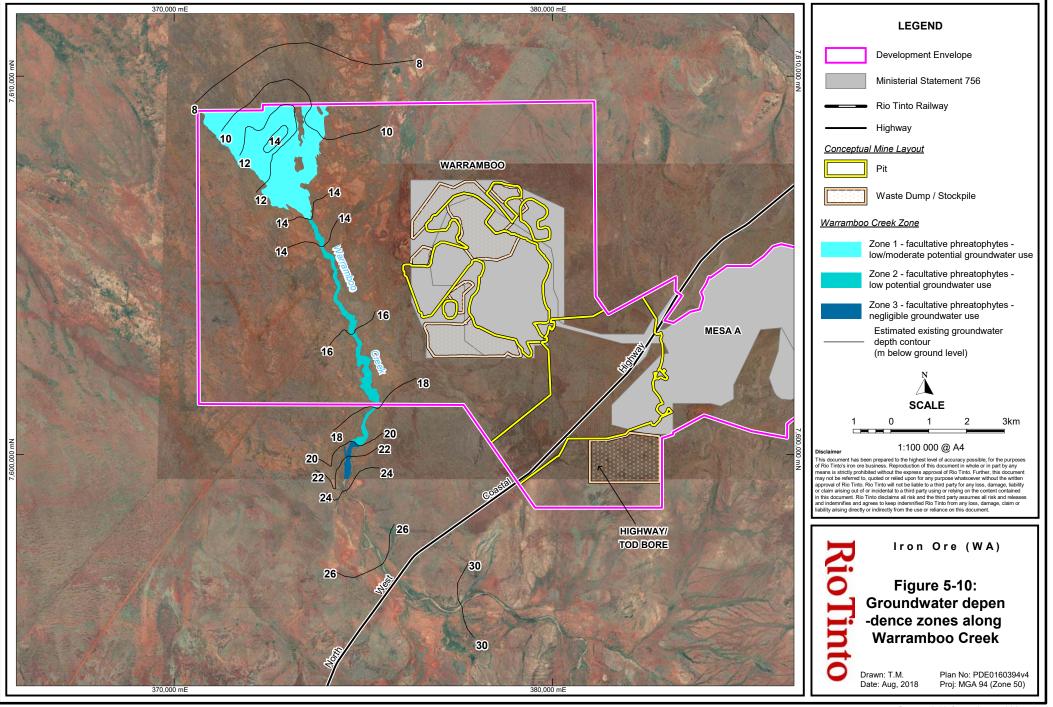


Table 5-11: Potential indirect impacts on vegetation from groundwater drawdown in the Yarraloola Aquifer

Z one	Zone Zone description		Extent	•	Modelled drawdown (m below pre-mining	Tatalor aliani orianioni, oriani obalio alquinoro	
		unit	(ha)	below ground level)	groundwater level)	Overstorey – phreatophytic species	Understorey
The distribution of phreatophytes with increasing lateral spread from channels and general proliferation on the floodplain indicates an increased potential for phreatophytes to access groundwater from the CID/Yarraloola Aquifers. However, some of these	EcrAtAanTe	19	10-14	12-22	 Likely reduction in canopy cover, particularly during extended dry periods Potential increase in mortality of phreatophytic species Potential structural changes due to the longer term influence of increased mortality within phreatophytic populations Some potential for compositional changes within associated species assemblages, but dominant components of the community are unlikely to experience compositional change. 	Some potential for minor	
Zone 1 Low to Moderate potential for phreatophytes to access groundwater	distributional characteristics also indicate reliance upon surface water regimes within the Warramboo Creek system (rather than on groundwater). Seasonal rainfall is expected to continue to provide the majority of riparian water requirements through surface water inputs, soil pore moisture stores and associated small scale, shallow aquifers. Substantial Clay formations	EcrEvCcAtAs	148	9-14	9-22	 Likely reduction in canopy cover during extended dry periods Potential increase in mortality of phreatophytic species Potential structural changes, particularly in denser woodland representations of this community, due to the longer term influence of increased mortality within phreatophytic populations Some potential for compositional changes within associated species assemblages but dominant components of the riparian community are unlikely to experience compositional change. 	changes to abundance of understorey species due to changes in shading of understorey and
Understorey vegetation cover is relatively low and generally impacted by cattle and weed species. The understorey species present are unlikely to have root depth greater than 5-10 m and are highly unlikely to directly access groundwater.	EvCcAtpAccA	368	9-14	6-22	 Likely reduction in canopy cover during extended dry periods Some potential minor increases in mortality of phreatophytic species Structural changes unlikely Compositional change unlikely as baseline composition and structure suggest relatively low potential for reliance on groundwater. 		
	The depth to groundwater and minimal lateral distribution of phreatophytes away from the low flow channel of Warramboo Creek indicate that phreatophytes may access groundwater but any access is minimal and likely to represent only a small	EcrAtAanAtTe	22	14-20	6-26	 Some potential for reduction in canopy cover during extended dry periods Potential increase in mortality of phreatophytic species Structural and compositional changes unlikely. 	
Zone 2 Low potential for phreatophytes to access groundwater	Zone 2 Low potential for phreatophytes to access access is minimal and likely to represent only a small proportion of their water requirements. Longitudinal distribution patterns of <i>E. camaldulensis</i> along the local groundwater height gradient (i.e. decreasing depth to groundwater trends not mirrored by a trend of increasing abundance of <i>E. camaldulensis</i>) suggest that surface water inputs are likely to play a more	EcAanAtrAbAtu Te	74	14-20	6-26	 Some potential for reduction in canopy cover during extended dry periods Some potential for individual tree deaths Structural and compositional changes unlikely. 	Changes to understorey vegetation unlikely

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Zone Zone description	Zone description	Vegetation	Extent	Estimated current local depth to	Modelled drawdown (m below pre-mining	Potential impact where riparian vegetation is able to access the broader groundwater table rather than shallow, small scale aquifers		
	Zone description	unit (ha)		, ,	groundwater level)	Overstorey – phreatophytic species	Understorey	
	Depth to groundwater and lack of lateral spread of	EcrAtAanAtTe	7	>20m	<6m	Changes to canopy cover, structure and composition are unlikely.		
Zone 3 Negligible potential for phreatophytes to access groundwater	phreatophytes away from the low flow channel indicates a low probability that riparian vegetation is dependent on groundwater from the CID/Yarraloola aquifers. If groundwater access is occurring, it is likely that phreatophytes are accessing small alluvial aquifers which are likely to operate independently of the CID/Yarraloola aquifers.	EcAanAtrAbAtu Te	8	>20m	<6m	Changes to canopy cover, structure and composition are highly unlikely.	Changes to understorey vegetation unlikely	

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Discharge of surplus water to the ephemeral Warramboo Creek has the potential to impact riparian vegetation along Warramboo Creek as summarised in Table 5-12.

Table 5-12: Potential indirect impacts from surplus water discharge

Component	Modelled discharge rate (GL/a)	Modelled total discharge volume (GL)	Extent of potential impact to vegetation	Predicted potential impact to vegetation
Discharge to Warramboo Creek	2 to 7	9	Up to 8 km downstream from the discharge point	Temporary changes in structure, cover and health of riparian vegetation

5.5.3 Cumulative impacts

Potential cumulative impacts of the Proposed Change to flora and vegetation are the clearing of vegetation and Priority Flora species in the Robe Valley. Table 5-13 shows approved, current and proposed clearing for the approved activities and the Proposed Change.

Table 5-13: Approved, current and proposed clearing

Approved activities		Proposed Change	Revised Proposal
Clearing approved under Ministerial Statement 756 (ha)	Clearing to end 2017 (ha)	Proposed additional clearing (ha)	Proposed total clearing (ha)
3,680	1,914	3,000	6,680

Detailed mapping at the scale undertaken for the Development Envelope is not broadly available for the Pilbara region. Identification and assessment of potential cumulative impacts to vegetation, therefore, requires broader vegetation mapping such as that completed by Beard (1975a, 1975b) to be used.

Table 5-14 shows the pre-European extent of vegetation units in the Pilbara as defined by Beard (1975a, 1975b), the proposed clearing and the total cumulative clearing taking into account the following historical, proposed and reasonably foreseeable clearing:

- Existing and historical mining projects: Mining operations (Mesa A/Warramboo, Mesa J, Mesa K, East Deepdale and Middle Robe)
- Existing clearing from other infrastructure: Mesa J and Mesa A Railways, borrow pits, power lines, roads and tracks
- Reasonably foreseeable projects: the Proposed Change and the Mesa H Proposal (currently being assessed).

Assessment of cumulative impacts to vegetation is provided in Section 5.6.3.

Table 5-14: Cumulative impacts to vegetation units defined by Beard (1975a, 1975b)

Vegetation unit	Pre-European extent in Pilbara (ha)	Robe Valley historical clearing (% of pre-European extent)	Mesa A Hub proposed clearing (% of pre-European extent)	Total cumulative clearing¹ (% of pre- European extent)
Hammersley 82	2,169,360	<1%	<1%	<1%
Hammersley 609	74,130	2%	<1%	3%
Onslow Coastal Plain 600	67,100	<1%	<1%	<1%
Onslow Coastal Plain 604	15,660	2%	3%	5%
Onslow Coastal Plain 605	88,350	<1%	<1%	<1%
Stuart Hills 29	17,220	1%	2%	3%
Stuart Hills 93	55,610	<1%	<1%	<1%
Stuart Hills 583	242,300	<1%	1%	1%
Stuart Hills 603	54,800	2%	<1%	2%
Stuart Hills 605	25,730	<1%	<1%	<1%

¹ Total cumulative clearing = historical + proposed + reasonably foreseeable

Table 5-15 shows potential cumulative impacts on Priority Flora in the Robe Valley. The existing disturbance provided is the disturbance from implementation of the approved Mesa A/Warramboo Iron Ore Project. Baseline flora surveys for other disturbed areas in the Robe Valley pre-date the Rio Tinto database. Total cumulative disturbance includes disturbance from the approved activities, proposed disturbance for the Proposed Change and reasonably foreseeable disturbance that may occur as part of the Mesa H Proposal. Assessment of cumulative impacts to Priority Flora is provided in Section 5.6.3.

Table 5-15: Cumulative impacts on Priority Flora in the Robe Valley

Taxon	Conservation status	Individuals in Rio Tinto database	Individuals (% of total Rio Tinto records)			
			Disturbance from other approved activities	Disturbance from proposed activities (Mesa H)	Disturbance from Proposed Change	Total cumulative disturbance ¹
Abutilon sp. Onslow (F. Smith s.n. 10/9/61)	Priority 1	1,284			70 (5%)	70 (5%)
<i>Triodia</i> sp. Robe River (M.E. Trudgen et al. Met 12367)	Priority 3	288,681	1 (<1%)	28,293 (10%)	1,774 (<1%)	30,068 (10%)
Goodenia nuda	Priority 4	10,627			114 (1%)	114 (1%)
Rhynchosia bungarensis	Priority 4	12,736	12 (<1%)	121 (1%)	38 (<1%)	171 (1%)

¹Total cumulative disturbance = Mesa A/Warramboo + proposed + reasonably foreseeable

5.6 Assessment of Impacts

5.6.1 Direct impacts

5.6.1.1 Loss of vegetation due to clearing

The Proposed Change involves the clearing of up to 3,000 ha of vegetation to enable construction of the mine and associated infrastructure including mine pits, mineral waste dumps, wet processing plant, borefield and haul roads. During development of the Proposed Change, water supply, haul road route and waste fines disposal options were examined. Preferred options have been selected to meet project requirements while minimising clearing of vegetation, particularly significant vegetation, as described below:

- Water supply: Options considered included an extension to the current borefield at Warramboo, a new borefield at Jimmawurrada (located approximately 40 km south-east of Mesa C) or a combination of the two. Extension of the current borefield at Warramboo was selected as the preferred water supply option as hydrogeological test work showed an extension to the borefield would be able to meet the increased water demand, and the proximity of the existing borefield and proposed extension to the Mesa A Hub will result in less clearing than development of a new borefield at Jimmawurrada
- Haul road routes: Haul road routes have been designed to avoid direct disturbance to the Sand Sheet PEC. The closest proposed disturbance to the main Sand Sheet PEC vegetation will be for the operational and construction haul roads. These roads are proposed to be located to the north and south of the Sand Sheet approximately 120 m from the closest point of the main Sand Sheet. No new disturbance is proposed in the vicinity of the smaller Sand Sheet PEC. An existing track located approximately 55 m south of the closest point of the smaller Sand Sheet PEC will be used as a temporary construction haul road.
- Waste fines disposal: WFSF options considered included in-pit at Warramboo, in-pit at Mesa A and out-of-pit. In-pit storage at Warramboo was selected as the preferred option based upon environmental, operational and closure considerations. One of the key reasons for selecting the in-pit option at Warramboo is that it requires no significant additional clearing.

Clearing will result in loss of vegetation, including loss of vegetation units of conservation significance. The majority of vegetation that may be impacted by the Proposed Change is considered to be in Good to Excellent condition. The majority of vegetation types within the western portion of the Development Envelope are representative of those found on similar landforms in the region (MWH 2016). It is noted that the vegetation types associated with the Stony Plains landform have a flora composition that reflects both the semi-arid vegetation of the Hamersley subregion and the more coastal vegetation of the Roebourne subregion (MWH 2016), consistent with the western portion of the Development Envelope straddling two IBRA subregions. Over 7,000 ha of the vegetation types associated with the Stony Plains landform has been recorded in the western portion of the Development Envelope, representing over 47% of the western portion of the Development Envelope.

No clearing will occur within the Sand Sheet PEC (vegetation type CzAtGeTs). The nearest proposed clearing will be approximately 120 m from the closest point on the Sand Sheet PEC. Clearing will disturb up to 40 ha within the buffer area around the Sand Sheet PEC (representing approximately 7% of the total PEC buffer area of both occurrences). The majority of clearing within the PEC buffer will occur within vegetation units AbAanAatTw, AbAanAiTw and AatAanCtTw, none of which are considered to have any level of conservation significance.

The Proposed Change may impact five vegetation types of high local significance (Table 5-9):

- ChAbAtrTw: Approximately 1.5 ha of this vegetation type may be disturbed in the western portion of the Development Envelope, equating to 2% of the extent of this unit in the western portion of the Development Envelope. Vegetation type ChAbAtrTw is common on the terraces of the Robe River; Rio Tinto has recorded approximately 1,200 ha of this unit along the banks of the river. The proposed disturbance would therefore equate to less than 0.2% of the recorded extent of this vegetation type in the Robe Valley
- **EcEvMgAtrCv**: Approximately 2 ha of this vegetation type may be disturbed, equating to less than 1% of the extent of this vegetation type in the western portion of the Development Envelope.
- AanAbAsyTP, AanAiAatAbTP and CcAanTe: Approximately 30 ha, 11 ha and 10.5 ha of these vegetation types may be disturbed respectively, equating to 3.5%, 1.9% and 9% of the extent of these vegetation types in the western portion of the Development Envelope respectively. These vegetation types are considered to be of high local significance because they support the Priority 1 flora taxon, Abutilon sp. Onslow (F. Smith s.n. 10/9/61). Based on analysis of available aerial imagery and previous records of Abutilon sp. Onslow (F. Smith s.n. 10/9/61), vegetation with the potential to support this priority taxon extends to the north-west for greater than 10 km (Stantec 2018). However, Abutilon sp. Onslow is considered to be restricted to the coastal plains from Onslow (located 51 km west) to the Development Envelope so it is unlikely that the entire mapped extent of these vegetation types support Abutilon sp. Onslow; the significance of the vegetation types would thus be lower in areas where they does not support Abutilon sp. Onslow. Based on the avoidance of direct impact to the Sand Sheet PEC and the limited proportion of high local significance vegetation types that may be directly impacted by the proposed clearing, the proposed impact to high local significance vegetation types is not expected to be significant at a local or regional level.

Approximately 9% of the vegetation mapped in the western portion of the Development Envelope is considered to be of moderate local significance. The vegetation units of moderate local significance are summarised in Appendix 6 and are generally considered to be common in the Mesa A/Warramboo area or have been recorded throughout the Robe Valley. The Proposed Change will result in the total loss of up to 13% of the mapped extent of these vegetation units in the western portion of the Development Envelope, affecting 15 of the 19 vegetation units. The majority of vegetation units of moderate local significance affected will be subject to clearing of less than 30% of their mapped extent in the western portion of the Development Envelope. Three of the vegetation units will be subject to up to approximately 50% of their mapped extent in the western portion of the Development Envelope being cleared; ElAtuAbTwERIm (~33%), ChAtuTwTe (~48%) and CcAaAbAsyTeTw (~48%). ElAtuAbTwERIm is considered to be

common in the Mesa A/Warramboo area (Biota 2005a) and ChAtuTwTe and CcAaAbAsyTeT have both been recorded elsewhere in the Robe Valley based on Rio Tinto's internal database. Therefore, the proposed loss of portions of these units within the western portion of the Development Envelope is not considered to be significant.

Two of the five vegetation units associated with Warramboo Creek that are considered to be of moderate local significance will be impacted by the Proposed Change; EcAanAtrAbAtuTe (approximately 7 ha to be cleared totalling 8% of the mapped extent within the western portion of the Development Envelope) and EcrAtAanAtTe (approximately 1 ha to be cleared totalling 4% of the mapped extent within the western portion of the Development Envelope). Warramboo Creek extends for approximately 51 km, with approximately 12 km of the creek within the Development Envelope. The associated vegetation types are likely to extend beyond the Development Envelope (based on aerial photography) and are not considered to be locally restricted. Therefore, the proposed impact to these vegetation types is not expected to be significant.

5.6.1.2 Loss of conservation significant flora due to clearing

No flora listed as threatened under the WC Act or the EPBC Act will be impacted by the Proposed Change.

The proposed locations of pits, waste dumps and infrastructure are still conceptual. A range of conceptual disturbance footprints have, therefore, been considered during the Environmental Impact Assessment and the maximum disturbance to Priority Flora is presented in this ERD. This approach has been taken in order to limit disturbance to significant environmental values while maintaining some flexibility for development within the Development Envelope. The Proposed Change will preferentially avoid known locations of Priority Flora as far as practicable however clearing will result in the direct loss of some individuals (limited to the maximum disturbance presented in this ERD) of the following conservation significant flora species:

- Abutilon sp. Onslow (F. Smith s.n. 10/9/61) (P1): This species has a range of approximately 135 km on Naturemap (DBCA 2018a). The Rio Tinto database currently contains records of 1,284 individuals and it is likely this species is under-collected and its distribution extends further outside the Development Envelope than current records show. The Proposed Change may disturb up to 5% of records of this species in the Rio Tinto database. Given the low proportion of records to be disturbed and that the species is likely under-collected, it is unlikely that the Proposed Change will result in a significant impact to this species at a local or regional level
- Triodia sp. Robe River (M.E. Trudgen et al. MET 12367) (P3): This species has a range of approximately 180 km on Naturemap (DBCA 2018a). The Rio Tinto database currently contains records of over 280,000 individuals of this species, with 34,324 of those recorded in the western portion of the Development Envelope. In addition, API recorded 24 populations of this species, estimated to contain almost 60 million individuals across a 90,000 ha survey area at their West Pilbara Iron Ore Project (API 2011). The API project is located approximately 80 km south-east of the Development Envelope. The Proposed Change will disturb less than 1% of Rio Tinto records of this species. Given the high number of records, large range of the species and the small proportion of records to be disturbed, it is unlikely that the Proposed Change will result in a significant impact to this species at a local or regional level

- Goodenia nuda (P4): Although restricted to the Pilbara region, Goodenia nuda occurs extensively throughout the Pilbara in a variety of habitats. This species has a range of approximately 880 km on Naturemap (DBCA 2018a). The Rio Tinto database currently contains records of over 10,000 individuals of this species, with 368 of those recorded in the Development Envelope. Although the Proposed Change will disturb up to 31% of the records of this species in the western portion of the Development Envelope, this represents only 1% of records of this species in the Rio Tinto database. This species has been recorded in the local area outside the Development Envelope, namely 3 km to the west (five populations, consisting of over 20 individuals in total), 7 km to the north (four populations, consisting of five individuals in total) and 7-10 km south (two populations, consisting of 12 individuals in total). Given the range of the species and the small proportion of records to be disturbed, it is unlikely that the Proposed Change will result in a significant impact to this species at a local or regional level
- Rhynchosia bungarensis (P4): This species has a range of approximately 430 km on Naturemap (DBCA 2018a). The Rio Tinto database currently contains records of over 12,736 individuals of this species, with 760 of those recorded in the western portion of the Development Envelope. The Proposed Change will disturb less than 1% of records of this species in the Rio Tinto database. Given the range of the species and the small proportion of records to be disturbed, it is unlikely that the Proposed Change will result in a significant impact to this species at a local or regional level.

The Proposed Change may disturb taxa recorded in the western portion of the Development Envelope that are considered range extensions as they are more commonly recorded in other regions. Up to 3% and 1% of records in the Rio Tinto database of *Olearia stuartii* and *Phyllanthus exilis*, respectively may be disturbed. However, both species have numerous records in the Pilbara region and given the small proportion of records to be disturbed it is unlikely that the Proposed Change will result in a significant impact to these species at a local or regional level.

5.6.2 Indirect impacts

5.6.2.1 Loss or degradation of riparian vegetation as a result of groundwater drawdown

Detailed vegetation mapping recorded obligate phreatophytic vegetation along the Robe River adjacent to Mesas B and C (Rio Tinto 2017a). Hydrogeological modelling indicates there is limited hydraulic connectivity between the Mesa C CID Aquifer and the Robe River alluvium. Consequently, drawdown of groundwater level within the Mesa C CID Aquifer is not expected to result in observable changes to groundwater levels within the adjacent Robe River Alluvial Aquifer. Should there be greater hydraulic connectivity between the Mesa C CID Aquifer and the Robe River alluvium than current modelling and hydrogeological investigations indicate, there is potential for stress to individual trees and changes to understorey vegetation along the Robe River within the extent of drawdown. Monitoring of groundwater levels in the alluvial aquifer and vegetation health will be undertaken to confirm the hydrological predictions. If unexpected impacts occur, mitigation will be implemented (Section 5.8).

Approximately 13 km of the defined channel of the ephemeral Warramboo Creek is expected to be inside the modelled cone of depression that will result from abstraction of groundwater from the Warramboo borefield extension. No permanent or semi-permanent pools have been identified in this section of Warramboo Creek. Warramboo Creek

supports facultative phreatophytic vegetation. Abstraction of groundwater from the Warramboo borefield extension may impact the five vegetation units identified during additional mapping as supporting facultative phreatophytic vegetation along Warramboo Creek and onto the flood plain beyond the defined flow channel; EvCcAtpAccA, EcrEvCcAtAs, EcrAtAanTe, EcAanAtrAbAtuTe and EcrAtAanAtTe.

For Australian systems, evidence suggests that reliance on groundwater by terrestrial vegetation is greatly reduced in areas where the water table exceeds a threshold depth, likely to lie between 7 m and 12 m (Benyon et al. 2006; DoW 2009; O'Grady et al. 2010; Zolfaghar et al. 2014), with 10 m suggested as a general threshold (Eamus et al. 2006). Vegetation may potentially access groundwater when the water table is between 10 m and 20 m depth, although it is thought to be negligible in terms of contribution to total plant water use (Zencich et al. 2002). Beyond 20 m depth, the probability of groundwater as a water source for vegetation is regarded as being low. The pre-mining depth to groundwater along Warramboo Creek, throughout the modelled cone of depression, is historically 7-26 m below ground level (with the depth as shallow as 7 m in the coastal plain area in the northern extent of the drawdown zone and the depth up to 26 m in the south of the drawdown extent). Eucalvptus camaldulensis which become established under relatively deep groundwater conditions (i.e. 10 m below ground level and deeper) have been observed to exhibit substantial resilience to changes in groundwater availability. In such situations, exceedance of impact thresholds have been observed leading to canopy decline (without detectable increases in mortality) and removal of selective weaker branches (likely through cavitation and vascular failure), until water demand is reduced to a level where the available root system is better matched to vadose soil resources.

Considering the available literature and Rio Tinto's experience with facultative phreatophytes within the Pilbara, three riparian vegetation impact zones were delineated for Warramboo Creek (Section 5.5.2) enabling assessment of the likely current access of phreatophytic species to groundwater and assessment of potential impacts from changes to groundwater levels Figure 5-10.

The distribution of phreatophytes with increasing lateral spread from channels and general proliferation on the floodplain indicates an increased potential for phreatophytes in Zone 1 to access groundwater from the CID/Yarraloola Aquifers. However, some of these distributional characteristics also indicate reliance upon surface water regimes within the Warramboo Creek system (rather than on groundwater). Therefore, for vegetation units EcrAtAanTe, EcrEvCcAtAs and EvCcAtpAccA in Zone 1, a reduction in canopy cover is likely; particularly during extended dry periods, and mortality of phreatophytic species has potential to increase. There is also potential for structural changes, and some potential for compositional changes, to vegetation units EcrAtAanTe and EcrEvCcAtAs. The vegetation types in Zone 1 are likely to extend beyond the Development Envelope (based on aerial photography) and are not considered to be locally restricted. Therefore, the proposed impact to these vegetation types is not expected to be significant.

Facultative phreatophytic species in Zone 2 may access groundwater but any access is likely to be minimal and represent only a small proportion of their EWR. As noted above, *Eucalyptus camaldulensis* which become established under relatively deep groundwater conditions (i.e. 10 m below ground level as in Zone 2) have been observed to exhibit substantial resilience to changes in groundwater availability. In this Zone surface water inputs are likely to play a more important role than groundwater. Although changes to

groundwater access in Zone 2 may result in a reduction in canopy cover and potentially an increase in mortality of phreatophytic species in vegetation units EcrAtAanAtTe and EcAanAtrAbAtuTe, structural and compositional changes are considered unlikely. As the low flow channel and alluvial substrate will remain, the functionality of the community is expected to be maintained.

Based on depth to groundwater and a lack of lateral spread of phreatophytes away from the low flow channel, it is considered to be a low probability that riparian vegetation in Zone 3 (vegetation types EcrAtAanAtTe and EcAanAtrAbAtuTe) is dependent on groundwater from the CID/Yarraloola aquifers. Changes to canopy cover, structure and composition are considered unlikely in vegetation type EcrAtAanAtTe and highly unlikely in vegetation type EcAanAtrAbAtuTe.

5.6.2.2 Loss or degradation of riparian vegetation as a result of surface water discharge

The controlled discharge of surplus water to Warramboo Creek will change the water availability in a section of Warramboo Creek (up to 8 km) downstream from the discharge point. Surface water discharge will not be continuous during the life of the Revised Proposal. Modelling of discharge shows that continuous flow could extend up to 8 km downstream during periods of discharge. The change in hydrological regime is likely to result in temporary changes to riparian vegetation along Warramboo Creek. It is anticipated that vegetation adaptation to the altered hydrological regime could include new growth and changes in structure and cover. Specifically, it is likely there will be a change of dominance and cover with an increase in the sedges and rushes genera of Bulbostylis, Cyperus, Fimbristylis and Lipocarpha that are currently present at 16 locations and/or quadrats (Scott Walker, MWH, pers. comm. 7 September 2015). It is also possible that Melaleuca species may recruit at these locations due to the available surface water. Changes in dominance cover and richness may be recorded over time; however, the functioning of the community is still likely to be satisfactory (Scott Walker, MWH, pers. comm. 7 September 2015). The vegetation along the creek may also be temporarily affected by cattle and other introduced fauna being attracted to the available water during periods of discharge. The proposed discharge is not continuous and is not expected to have any long-term adverse effects on the riparian vegetation community. Following cessation of discharge, vegetation that has become established as a result of discharge may be affected by a loss of available water. However, it is anticipated that the riparian vegetation will revert to that adapted to an ephemeral system.

The proposed discharge of surplus groundwater via the proposed discharge point at Warramboo Creek may alter surface water chemistry and sediment quality downstream of the discharge point during natural no-flow conditions. Changes to water chemistry and sediment quality may result in short-term changes to vegetation health.

The surface and groundwater chemistry of Warramboo Creek is described in Section 8.4.4 and 8.6.3. Surface water samples collected from Warramboo Creek after rainfall events show the water to be fresh with a neutral to mildly alkaline pH. Total nitrogen levels in Warramboo Creek are generally elevated compared with the Australian and New Zealand Environment and Conservation Council (ANZECC) and Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) 95% aquatic ecosystem protection level (ANZECC/ARMCANZ 2000). Aluminium, total chromium, copper, iron, nitrates, total phosphorus and zinc also show some degree of elevation compared with ANZECC 95% aquatic ecosystem protection levels.

Groundwater chemistry data for samples collected from bores most likely to represent the proposed surplus water discharge were compared with data from surface water samples and ANZECC guidelines. The chemistry of the groundwater proposed for discharge has a neutral to mildly alkaline pH and is considered fresh to brackish. Median concentrations of boron, nitrate, NOx and total nitrogen and also electrical conductivity (EC) in the groundwater are elevated compared with both the surface water in Warramboo Creek and the ANZECC guidelines.

Under natural no-flow conditions, discharged surplus water has the potential to increase salt and some metal concentrations within Warramboo Creek and result in accumulation of salts and metals within sediments for the duration of discharge, potentially causing temporary vegetation stress and decline in vegetation health in an 8 km section of Warramboo Creek. However, during natural flow conditions which occur during rainfall events, discharged surplus groundwater will be diluted and the system flushed (Scott Walker, MWH, pers. comm. 7 September 2015). This will mitigate the potential impacts of short-term increases in salinity on vegetation in the 8 km of Warramboo Creek that may be affected by the proposed discharge.

In regards to potential erosion impacts, discharge of excess groundwater is predicted to occur at a rate which is significantly less than the flow rates generated during flood events and on this basis, discharge is unlikely to overtop the creek bank. Discharge velocities are predicted to be less than 1 m/s which are considered unlikely to result in channel erosion within Warramboo Creek (Rio Tinto 2015a).

5.6.2.3 Degradation of vegetation due to ingress of weeds

Historically, weeds in the Pilbara have been introduced through pastoral activities (EPA 2014). However, weeds are often also able to rapidly invade locations subject to disturbance, land clearing and/or altered hydrological regimes. This can result in replacement of native species and simplification of natural ecosystems.

Most weed species recorded in the western portion of the Development Envelope were recorded in drainage lines, disturbed areas or on the Stony Plains. Movement of cattle and natural drainage represent the major sources of weed distribution in the region.

Limited clearing will occur in drainage lines. Clearing at Warramboo Creek for installation of the discharge point may intersect an existing population of the dominant weed in the western portion of the Development Envelope; *Cenchrus ciliaris, contributing to seed spread. Weed species have the potential to spread further downstream with altered hydrological regimes, specifically, discharge to Warramboo Creek.

The Proponent has well established strategies for the management of weeds at its Pilbara operations to ensure that risks of weed ingress are minimised. This includes management of weeds associated with discharge of surplus water in creeklines. Weed monitoring and management strategies have been and will continue to be implemented to minimise the risk of weed ingress.

5.6.2.4 Degradation of vegetation due to increased dust deposition

Construction and operation of the Proposed Change is likely to increase airborne dust, which in turn may result in increased dust deposition on native vegetation in the western portion of the Development Envelope.

Due to the significance of the Sand Sheet PEC and its proximity to the mining operations, infrastructure has been designed to avoid being in close proximity to the Sand Sheet PEC as far as practicable. Two construction haul road options were considered, a northern route and a southern route. While the northern construction haul route is within existing tenure and represents a shorter haul distance, this route would require new disturbance within 50 m of the Sand Sheet PEC, potentially leading to increased dust deposition on the Sand Sheet PEC. The southern construction haul route is separated by topography from the Sand Sheet PEC and is 120 m away at its closest point so is not expected to result in a significant change in dust deposition on the Sand Sheet PEC.

The wet processing plant is proposed to be located approximately 250m from the northern edge of the main Sand Sheet PEC at its closest point. The wet processing plant is not expected to significantly increase airborne dust as the moisture content of the ore will increase during the beneficiation process.

Winds in the Development Envelope are predominantly southerly to south-easterly (Envall 2017) so dust deposition as a result of the proposed haul road will be higher to the north of the road than to the south of the road where the Sand Sheet PEC lies. Northerly winds which would transport dust from the haul road to the Sand Sheet PEC are relatively infrequent (Envall 2017). Dust monitoring conducted on the Sand Sheet PEC at the point closest to the proposed haul road shows current dust deposition varies between 1.5 g/m²/month and 9.1 g/m²/month with an average of 5.7 g/m²/month. Dust modelling predicts monthly dust deposition will increase by 1.1 g/m²/month at the closest point on the Sand Sheet PEC due to activity on the proposed haul road (Envall 2017). Dust modelling indicates that dust deposition due to activity on the proposed haul road will be below 0.5 g/m²/month 500 m away from the haul road.

Matsuki *et al.* (2016) conducted a study examining the impacts of dust on plant health in semi-arid environments. The study found no evidence of negative impacts on plant health for dust deposition rates up to 77 g/m²/month. Dust deposition monitoring conducted at Mesa A in 2016 approximately 340 m from the current Mesa A mine pit and approximately 100m from the Mesa A plant showed a maximum dust deposition rate of 9.4 g/m²/month (Envall 2017). Based on dust and vegetation monitoring to date, modelled dust deposition for the Proposed Change and the study by Matsuki *et al.* (2016), any decline in vegetation health due to dust deposition is likely to be limited to the area immediately adjacent to the proposed mining operation.

The Proponent has well established strategies for the management of dust emissions at its Pilbara operations. These strategies will continue to be implemented to manage dust emissions. Strategies to manage dust emissions include:

- Minimising exposed surfaces by minimising clearing and rehabilitating disturbed areas no longer in use
- Applying water (or other dust suppressants) to roads, working surfaces and stockpiles as required
- Restricting vehicle access to designated roads and tracks and implementing speed limits to minimise dust generation from roads.

Monitoring will enable dust management performance to be assessed and strategies to manage dust emissions refined where necessary.

The Proposed Change may result in a minor, temporary increase in localised dust deposition on vegetation but is not expected to significantly impact vegetation.

5.6.3 Cumulative impacts

The Proposed Change will result in the clearing of up to 3,000 ha of vegetation, in addition to the 3,680 ha approved under Ministerial Statement 756 for the existing Mesa A/Warramboo Iron Ore Project.

Ten vegetation units as mapped by Beard occur in the Development Envelope. Historical clearing in the Robe Valley has resulted in disturbance to these units with the greatest disturbance being to Hammersley 609 (2% of Pre-European extent), Onslow Coastal Plain 604 (2% of Pre-European extent) and Stuart Hills 603 (2% of pre-European extent) as presented in Table 5-14. The Proposed Change will increase cumulative impacts to vegetation in the Robe Valley. Considering historical, proposed and reasonably foreseeable impacts, cumulative clearing of each vegetation unit will remain low, with the greatest contribution of the Proposed Change to cumulative impacts being to Onslow Coastal Plain 604 and Stuart Hills 29, with proposed clearing for the Proposed Change representing 3% and 2% of the Pre-European extent of these units respectively. The resultant cumulative clearing to these units would be 5% of the pre-European extent of the Onslow Coastal Plain 604 unit and 3% of the pre-European extent of the Stuart Hills 29 unit. Given the small (5% or less) proportion of cumulative disturbance to the vegetation units in the Development Envelope, the Proposed Change is considered unlikely to result in significant impacts to vegetation in the Pilbara region.

Approximately 4 km of Warramboo Creek falls within the current drawdown extent from groundwater abstraction for water supply from the Warramboo borefield to the existing Mesa A/Warramboo Iron Ore Project. Current drawdown in this area is approximately 1-2.5 m. Significant impacts to riparian vegetation in this area as a result of the current drawdown were not expected and have not been observed. It is likely the groundwater in this area represents a small proportion of the EWR of the phreatophytes present, given depth to groundwater in this area (approximately 14-16 metres below ground level) and a generally negligible degree of lateral spread of phreatophytes away from the low flow channel. In addition, flora and vegetation monitoring transects recently established along Warramboo Creek [RTIO CK 4-I, RTIO CK 5-I and RTIO CK 6-I in MWH (2016)] have not demonstrated any areas of reduced vegetation condition deemed to potentially be from drawdown. The areas of poorer vegetation condition in the transects were concluded to be due to cattle, erosion and the presence of weeds.

The Proposed Change will not result in cumulative impacts to riparian vegetation in Warramboo Creek from surplus water discharge as the approved activities do not involve discharge of surplus groundwater. Tracking of the disturbance footprint for the approved activities shows that only two recorded populations of Priority Flora have been disturbed by the existing operation:

- Triodia sp. Robe River (M.E. Trudgen et al. Met 12367): one individual, representing <1% of the records in the Rio Tinto database
- Rhynchosia bungarensis: 12 individuals, representing <1% of the records in the Rio Tinto database.

Considering historical disturbance from the Mesa A/Warramboo Iron Ore Project, the proposed disturbance and reasonably foreseeable disturbance in the Robe Valley, cumulative impacts to Priority Flora species will be 10% or less (Table 5-15). Cumulative impacts to Priority Flora are estimated to be:

- 5% of Rio Tinto records of Abutilon sp. Onslow (F. Smith s.n. 10/9/61)
- 10% of Rio Tinto records of *Triodia* sp. Robe River (M.E. Trudgen et al. Met 12367)
- 1% of Rio Tinto records of Goodenia nuda
- 1% of Rio Tinto records of Rhynchosia bungarensis.

The greatest contribution of the Proposed Change to cumulative impacts is 5% of Rio Tinto records of *Abutilon* sp. Onslow (F. Smith s.n. 10/9/61) and 1% of Rio Tinto records of *Goodenia nuda*. It is, therefore, considered that the Proposed Change will have only a limited contribution to cumulative impacts on Priority Flora in the Robe Valley.

Prior to commencement of mining at the Mesa A/Warramboo Iron Ore Project weed species were relatively widespread, but typically at low densities (Biota 2006a). Various weed species were recorded in the vicinity of Mesas A, B and C during the two-phase survey conducted by Biota 2006a), however none were recorded from Warramboo or the Sand Sheet PEC. Since commencement of the approved activities, six weed species have been recorded in the Sand Sheet PEC, with records subsequently eradicated. None of the recorded species are Weeds of National Significance or declared pests (Biota 2016). The increase in the number of species recorded and locations is likely to be due to increased monitoring effort since commencement of mining operations at the Mesa A/Warramboo Iron Ore Project. Favourable climatic conditions in 2009, 2011, 2013, 2015 and 2016 are likely to have contributed to the recorded spread of Buffel Grass (Biota 2016). The Proposed Change has the potential to increase the spread of weeds within and in the vicinity of the western portion of the Development Envelope due to ground disturbance and increased vehicle movements. This will be managed in accordance with established Rio Tinto weed management and monitoring programs.

The Proposed Change may contribute further dust deposition to a portion of the Sand Sheet PEC located to the south-east of Mesa A. Modelling of dust deposition from a new haul road from the Mesa A/Warramboo Iron Ore Project to Mesa B and Mesa C demonstrates that northerly winds are required to carry dust from the haul road to the Sand Sheet PEC and these are relatively infrequent. The predicted monthly dust deposition from the haul road at the closest point of the Sand Sheet PEC is 1.1 g/m²/month, which is within the standard deviation of the current month to month depositions (Envall 2017).

No other existing or proposed mining operations occur in the vicinity of the Proposed Change that would contribute to cumulative impacts on flora and vegetation.

5.7 Closure

The Mesa A Hub Closure Plan (Rio Tinto 2017b) is the updated closure plan for the Mesa A, B, C, Warramboo, Highway/Tod Bore operations and supersedes previous closure plans for the approved project. It is applicable to mine developments and associated infrastructure, excluding rail and road infrastructure, within the Development Envelope. A summary of the approach to closure of the Revised Proposal and how it relates to the flora and vegetation factor is provided below.

The proposed final land use assumes that the site will be rehabilitated to create a safe, stable and non-polluting landscape revegetated with native species, to maximise environmental and cultural heritage outcomes and ensure the site does not adversely impact on the current surrounding land use. Due to the nature of the mining activity undertaken, the final landform will include large voids and waste dumps, and will therefore be unlikely to support pastoral activities in the immediate vicinity of the mining areas. The final land use will be determined prior to closure during final planning phases and in consultation with relevant stakeholders.

The Mesa A Hub is a relatively new mining area, rehabilitation to date has been limited to areas associated with construction, however encouraging results have been received during monitoring to date. Progressive backfill of pits to meet closure commitments and other opportunistic rehabilitation will be undertaken during operations; however, the majority of rehabilitation will be completed at closure. Rehabilitation areas from other sites in the Robe Valley (Mesa J and Mesa K) are used to guide planned rehabilitation at the Mesa A Hub and to determine likely rehabilitation outcomes. Examples of rehabilitation areas from other sites in the Robe Valley are provided in Section 13 of the Mesa A Hub Closure Plan (Appendix 3).

The key objective for vegetation on rehabilitated land is that it is self-sustaining and compatible with the final land use. This will be measured via rehabilitation monitoring/site inspections and analysis of historical monitoring data. Seed used in rehabilitation works will be of local provenance. Weeds in rehabilitation are managed under the company's Weed Management Strategy which has control measures such as periodic spraying and equipment hygiene procedures.

The additional surface flow of water discharged to Warramboo Creek may result in temporary changes to riparian vegetation during mining. Following cessation of discharge, vegetation that has become established as a result of discharge may be affected by a loss of available water. It is anticipated that the riparian vegetation will revert to that adapted to an ephemeral system following cessation of discharge. As such, the proposed discharge is not expected to have any long-term adverse effects on the riparian vegetation community and management post closure is, therefore, not expected to be required.

5.8 Mitigation

Mitigation strategies to address the potential impacts and predicted outcomes are presented in Table 5-16.

The Mesa A Hub Environmental Management Plan (EMP) (Appendix 4) addresses the key environmental factors which were determined by the EPA as being relevant to the appropriate management of dewatering, surface water discharge, conservation significant vegetation communities and fauna species associated with the Mesa A Hub. The EMP identifies:

- Mitigation strategies proposed to minimise impacts to significant environmental values
- The environmental criteria that the Proponent will use to monitor performance of the mitigation strategies to ensure environmental objectives are met
- Trigger criteria, threshold criteria, trigger level actions and threshold contingency actions aligned with the overall management approach
- The management actions that will be implemented in response to monitoring results.

Table 5-16: Mitigation measures and predicted outcomes for flora and vegetation

Potential impacts	Mitigation to address potential impacts	Predicted outcome		
EPA Objective: To protect flora and vegetation so that biological diversity and ecological integrity are maintained.				
Direct Impact: loss of vegetation and conservation significant flora due to clearing Clearing will remove up to 3,000 ha of native vegetation including vegetation units of local significance and Priority Flora.	The following key management strategies will be implemented to manage the loss of flora and vegetation as a result of clearing: Avoid: The Proposed Change has been designed to avoid direct disturbance to the Sand Sheet PEC (excluding impacts within the buffer). Specifically, all roads avoid interaction with the Sand Sheet PEC. Development of infrastructure avoids interaction with the Robe River riparian zone.	The Proposed Change is expected to result in the unavoidable loss of up to 3,000 ha of vegetation. The Proposed Change is expected to impact five vegetation units of high local significance; ChAbAtrTw, EcEvMgAtrCv, AanAbAsyTP, AanAiAatAbTP and CcAanTe. The Proponent has conservatively estimated disturbance to <10% of the mapped extent of each of thes vegetation types within the western portion of the Development Envelope.		
	The Proposed Change has been designed to avoid known locations of Priority Flora as far as practicable. Priority Flora are also flagged with restriction zones in Rio Tinto's internal GIS system.	Some minor clearing of riparian vegetation will be required to facilitate installation of the discharge point on Warramboo Creek and monitoring points along the Robe River (8 ha).		
	The Proponent will ensure clearing only occurs in approved ground disturbance areas through continued implementation of the Proponent's Approvals Request system Minimise: The clearing footprint has been minimised through project optimisation to reduce the extent of clearing required. Specifically, in-pit disposal of waste fines and reverse osmosis plant effluent is proposed rather than development of an external tailings storage facility The Floring Florin	The Proposed Change is expected to impact four Priority Flora species: • Abutilon sp. Onslow (P1) • Triodia sp. Robe River (P3) • Goodenia nuda (P4) • Rhynchosia bungarensis (P4). Predicted impacts to individuals of these species range between 1%-5% of records in the Rio Tinto database being cleared by the Proposed Change. Each species is		
	and evaporation pond. The Proponent proposes that clearing be subject to a new Ministerial Statement for the Revised Proposal (Appendix 2). Schedule 1 of the Ministerial Statement shall authorise	considered to be generally well represented in the Robe Valley or Pilbara region and/or have large known ranges. Given this, and the small predicted loss of individuals relative to those known to occur across Rio Tinto sites		

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Potential impacts	Mitigation to address potential impacts	Predicted outcome
	clearing of no more than 6,680 ha within the Development Envelope of 16,834 ha. Rehabilitate: The conditions of the new Ministerial Statement for the Revised Proposal shall require the Proponent to implement a Closure Plan in accordance with the DMP / EPA Guidelines for Preparing Mine Closure Plans (2015). The Closure Plan (Appendix 3) includes a closure objective to ensure that vegetation on rehabilitated land is self-sustaining and compatible with the final land use. Indicative completion criteria include:	more broadly, the impacts to these species are unlikely to result in a significant decline in their regional representation. Significant residual impacts will be addressed via the provision of an offset in accordance with EPA requirements.
	 Seed used in rehabilitation works is of local provenance (except where seed pre-dates accurate recording of area) Native plants within rehabilitated areas are observed to flower and/or fruit Recruitment of native perennial plants is observed Species richness of native perennial plants within rehabilitated areas is not less than reference sites Any weed species recorded within rehabilitation areas are present within the local area Erosion from landforms does not threaten 	
	surrounding significant natural ecosystems. Offset: The Proponent proposes the provision of an environmental offset (\$750 per hectare) for the unavoidable clearing of native vegetation in Good to Excellent condition, and an environmental offset at the	

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Potential impacts	Mitigation to address potential impacts	Predicted outcome
	higher offset rate (\$1,500 per hectare) for the unavoidable clearing of riparian vegetation. Other legislation: The Proponent will adhere to the requirements of the WC Act.	
Indirect impact: loss or degradation of riparian vegetation as a result of groundwater drawdown.	The following key management strategies will be implemented to manage the potential loss of flora and vegetation as a result of groundwater drawdown Minimise: Hydrogeological modelling has been and will continue to be undertaken to facilitate understanding of current and future abstraction requirements. Groundwater abstraction will be minimised to that required to access the BWT resource and meet water supply requirements. Groundwater abstraction will remain within licence limits to minimise impacts to the local aquifer. The Proponent proposes to monitor the health of the M. argentea dominated communities and the M. argentea and E. camaldulensis co-dominated community along the Robe River and the E. camaldulensis dominated community along Warramboo Creek to ensure no irreversible impact to the health of riparian vegetation of the Robe River and Warramboo Creek as a result of groundwater abstraction for the Proposed Change. The Proponent proposes that groundwater abstraction be subject to a new Ministerial Statement for the Revised Proposal (Appendix 2). The conditions of the new Ministerial Statement shall require the Proponent to implement an EMP (Appendix 4) to manage groundwater abstraction such that there is no irreversible impact to the health of riparian vegetation of the Robe River and	Current hydrogeological data and modelling indicate limited to no hydraulic connectivity between the Mesa C CID Aquifer and the Robe River alluvial aquifer. Consequently, drawdown in groundwater levels within the Mesa C CID Aquifer is not expected to result in observable changes to obligate phreatophytic species. Should there be greater hydraulic connectivity between the Mesa C CID Aquifer and the Robe River alluvium than current modelling and hydrogeological investigations indicate, there is potential for stress to individual trees along the Robe River in the extent of drawdown. Groundwater drawdown may affect availability of groundwater to facultative phreatophytic vegetation along the 13 km section of the defined flow channel of Warramboo Creek and into the flood plain downstream of the defined channel. In Zone 1 (refer Section 5.5.2) the following may occur: Likely reduction in canopy cover during extended dry periods and potential increase in mortality of phreatophytic species in vegetation units EcrAtAanTe, EcrEvCcAtAs and EvCcAtpAccA Potential structural and compositional changes to vegetation units EcrAtAanTe and EcrEvCcAtAs.

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Potential impacts	Mitigation to address potential impacts	Predicted outcome
	Warramboo Creek as a result of groundwater abstraction for the Proposed Change. Other legislation: Groundwater abstraction has been and will continue to be managed in accordance with the existing Groundwater Licence issued under the <i>Rights in Water and Irrigation Act 1914</i> and associated Groundwater Operating Strategy, and any amendments as required.	In Zone 2 there is potential for a reduction in canopy cover during extended dry periods increase in mortality of phreatophytic species in vegetation units EcrAtAanAtTe and EcAanAtrAbAtuTe; however, structural and compositional changes are considered unlikely. In Zone 3 potential changes to canopy cover, structure and composition are considered unlikely in vegetation type EcrAtAanAtTe and highly unlikely in vegetation type EcAanAtrAbAtuTe. Although there may be impacts to the riparian vegetation along Warramboo Creek, the low flow channel and alluvial substrate will remain and the functionality of the community is expected to be maintained. The Proponent considers that the potential impacts can be managed and the residual impact will not be significant, therefore no offset is proposed.
Indirect impact: loss or degradation of riparian vegetation as a result of surface water discharge Discharge of surplus water into Warramboo Creek is expected to change the hydrological regime of Warramboo Creek from an ephemeral system to one with permanent water available for the duration of discharge. The change to the hydrological regime may impact riparian vegetation. Alteration of sediment quality and surface water chemistry in Warramboo Creek from discharge of surplus water may result in decline in vegetation health.	The following key management strategies will be implemented to manage the impacts to riparian vegetation as a result of discharge of surplus water: Minimise: Abstracted groundwater will be used on-site for processing and dust suppression to avoid discharge as far as practicable. Surplus water will be discharged at a rate which is not expected to cause bank erosion. The Proponent proposes to monitor the health of the riparian vegetation within the discharge extent to ensure there is no irreversible impact¹ to the health of riparian vegetation of Warramboo Creek as a result of surplus water discharge from the Proposed Change.	The Proposed Change is expected to result in temporary changes to riparian vegetation as a result of increased water availability during discharge. Continuous flow may extend up to approximately 8 km downstream of the discharge point during peak discharge conditions. It is anticipated that vegetation adaptation to increased water availability will include new growth and changes in structure and cover. Specifically, it is likely there will be a change of dominance and cover with an increase in the sedges and rushes genera of <i>Bulbostylis</i> , <i>Cyperus</i> , <i>Fimbristylis</i> and <i>Lipocarpha</i> . Once discharge ceases, it is anticipated that the riparian vegetation will revert to that adapted to an ephemeral system.

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Potential impacts	Mitigation to address potential impacts	Predicted outcome
	The Proponent proposes that the discharge of surplus water be subject to a new Ministerial Statement for the Revised Proposal (Appendix 2). The conditions of the Ministerial Statement shall require the Proponent to implement an EMP (Appendix 4) to ensure that discharge of surplus water does not have an irreversible impact on the health of riparian vegetation of Warramboo Creek. Other legislation: The Proponent will adhere to the requirements of the WC Act. Discharge of surplus dewatering water will be managed in accordance with an amended Operating Licence issued under Part V of the EP Act.	Changes to sediment quality and surface water chemistry from surplus water discharge may result in a temporary decline in vegetation health along an 8 km section of Warramboo Creek for the duration of discharge. Natural flow conditions following rainfall events will mitigate the potential impacts of increases in salinity on vegetation in the 8 km section of Warramboo Creek that may be impacted by the proposed discharge. The Proponent considers the potential impacts can be managed and residual impact will not be significant enough to warrant application of offsets.
Indirect impact: degradation of vegetation due to ingress of weeds Ground disturbance and change to the hydrological regime of Warramboo Creek as a result of discharge may introduce or spread weed species within the Development Envelope.	The Proponent has well established strategies for monitoring and management of the risk of weed ingress at its Pilbara operations. The following key management strategies will continue to be implemented to manage weeds: Avoid: The Proponent will implement strict hygiene procedures to prevent introduction of new or additional populations of weed species into the western portion of the Development Envelope. Minimise: The Proponent will undertake annual weed control to minimise weed infestations in the Development Envelope. The Proponent proposes to continue to monitor the Sand Sheet PEC. Monitoring will provide an indication of vegetation condition, community structure and diversity. The Proponent proposes that clearing and discharge of surplus dewatering water be subject to a new Ministerial	The Proposed Change is expected to result in a minor increase in the potential for weed infestation; however, this is not expected to significantly alter the condition of vegetation in the western portion of the Development Envelope. The Proponent considers that the potential impact from weeds can be managed and the residual impact will not be significant enough to warrant application of offsets.

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Potential impacts	Mitigation to address potential impacts	Predicted outcome
	Statement for the Revised Proposal (Appendix 2). Schedule 1 of the Ministerial Statement shall authorise clearing of no more than 6,680 ha within the Development Envelope of 16,834 ha.	
	The conditions of the Ministerial Statement for the Revised Proposal shall require the Proponent to implement an EMP (Appendix 4) to ensure that discharge of surplus water does not have an irreversible impact on the health of riparian vegetation of Warramboo Creek.	
	Rehabilitate: The Proponent proposes that closure be subject to a new Ministerial Statement for the Revised Proposal (Appendix 2). The Ministerial Statement shall require the Proponent to implement a Closure Plan in accordance with the DMP/EPA <i>Guidelines for Preparing Mine Closure Plans</i> (2015). The Closure Plan (Appendix 3) includes a closure objective to ensure that vegetation on rehabilitated land is self-sustaining and compatible with the final land use.	
	Other legislation: Weed management will be in accordance with the requirements of the <i>Biosecurity and Agriculture Management Act 2007</i> .	
Indirect impact: degradation of vegetation due to increased dust deposition	The following key management strategies will continue to be implemented to manage dust emissions:	The Proposed Change is expected to result in a minor increase in dust deposition on vegetation, including the
Dust emissions may impact vegetation within the western portion of the Development Envelope including the Sand Sheet PEC.	Minimise: The Proponent will minimise exposed surfaces by minimising clearing. The Proponent has designed the proposed haul road and construction haul road such that they are located as far from the Sand Sheet PEC as practicable to reduce potential impacts of dust on the Sand Sheet PEC.	Sand Sheet PEC; however, this is not expected to significantly alter the condition of vegetation in the western portion of the Development Envelope. The Proponent considers that the potential impact can be managed and the residual impact will not be significant enough to warrant application of offsets.

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Potential impacts	Mitigation to address potential impacts	Predicted outcome
	The Proponent will implement dust controls including water sprays, dust suppressants and other measures to minimise the extent of dust deposition on vegetation.	
	Rehabilitate: The Proponent will rehabilitate disturbed areas that are no longer in use.	

¹Where 'irreversible impact' is defined as, 'an impact resulting in a permanent loss of environmental value(s); or where intensive, and/or un-proven management intervention, potentially over a long timeframe, would be required to restore the environmental value(s)'.

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5.9 Predicted outcome

The Flora and Vegetation values identified in the western portion of the Development Envelope that are considered relevant to the Proposed Change, and the key predicted outcomes for those values are outlined below.

Significant vegetation

- The Sand Sheet PEC
- Riparian vegetation
 - Groundwater Dependent Vegetation along the Robe River (dominated by obligate phreatophytic vegetation - *Melaleuca Argentea*) adjacent to Mesas B and C
 - Riparian vegetation of Warramboo Creek (dominated by facultative phreatophytic vegetation - Eucalyptus camaldulensis and Eucalyptus victrix)
- Vegetation unit AanAbTP which supports two populations of the Priority 1 taxon *Abutilon* sp. Onslow (F. Smith s.n. 10/9/61).

Priority listed flora species

- Abutilon sp. Onslow (F. Smith s.n. 10/9/61) (Priority 1)
- Triodia sp. Robe River (M.E. Trudgen et al. Met 12367) (Priority 3)
- Goodenia nuda (Priority 4)
- Rhynchosia bungarensis (Priority 4).

The key predicted outcomes for the Flora and Vegetation values outlined above are:

- The unavoidable loss of up to 3,000 ha of vegetation.
- No direct disturbance to the Sand Sheet PEC.
- Direct clearing of riparian vegetation along Warramboo Creek as a result of the Proposed Change will be limited to 8 ha
- Disturbance of the vegetation unit of high local significance; AanAbTP as a result
 of the Proposed Change will be limited to 3% of the extent of this vegetation type
 in the western portion of the Development Envelope
- Disturbance of individuals of the four Priority Flora species as a result of the Proposed Change will be limited to between 1%-5% of records in the Rio Tinto database
- Groundwater drawdown may affect availability of groundwater to facultative
 phreatophytic vegetation along the 13 km section of the defined flow channel of
 Warramboo Creek and into the flood plain downstream of the defined channel.
 The potential for impact depends on the existing depth to groundwater and
 vegetation present:
 - In Zone 1 (low to moderate potential for groundwater dependence) there is potential for reduction in canopy cover and increased mortality in vegetation units EcrAtAanTe, EcrEvCcAtAs and EvCcAtpAccA as well as potential for structural and compositional changes to vegetation units EcrAtAanTe and EcrEvCcAtAs
 - In Zone 2 (low potential for groundwater dependence) there is potential for a reduction in canopy cover and individual tree deaths in vegetation units EcrAtAanAtTe and EcAanAtrAbAtuTe
 - In Zone 3 (negligible potential for groundwater dependence) potential impacts to vegetation are unlikely

- Temporary changes to riparian vegetation (including new growth and changes in structure and cover) as a result of increased water availability during discharge up to 8 km downstream of the discharge point during peak discharge conditions.
 Once discharge ceases, it is anticipated that the riparian vegetation will revert to that adapted to an ephemeral system
- Temporary decline in vegetation health up to 8 km downstream of the discharge point due to potential changes to sediment quality and surface water chemistry from surplus water discharge.

The Proponent considers that the residual impact from the direct clearing of up to 3,000 ha of native vegetation in Good to Excellent condition, including approximately 8 ha of riparian vegetation is significant and warrants an offset. The proposed offset is discussed in Section 13. After the mitigation hierarchy has been applied (Table 5-16), including avoidance and minimisation of direct impacts to key flora and vegetation values and the proposed offset, the Proponent considers that the Proposed Change can be managed to meet the EPA's objective for Flora and Vegetation. The proposed loss of vegetation is not expected to cause a loss of biological diversity at the local or regional scale and the ecological integrity of the area surrounding the footprint is expected to be maintained.

6. SUBTERRANEAN FAUNA

This section describes the subterranean fauna that occur within the western portion of the Development Envelope and provides an assessment of the potential impacts of the Proposed Change to conservation significant subterranean fauna, proposed mitigation measures and the predicted outcome for this key environmental factor.

6.1 EPA Objective

The EPA objective for subterranean fauna is to protect subterranean fauna so that biological diversity and ecological integrity are maintained.

6.2 Policy and Guidance

The following policy and guidance documents have been considered in the assessment of subterranean fauna.

6.2.1 EPA policy and guidance

- DMP and EPA Guidelines for Preparing Mine Closure Plans (DMP and EPA 2015)
- Statement of Environmental Principles, Factors and Objectives (EPA 2018a)
- Environmental Factor Guideline: Subterranean Fauna (EPA 2016f)
- Environmental Factor Guideline Inland Waters Environmental Quality (EPA 2016c)
- Technical Guidance: Sampling methods for Subterranean fauna (the content of this Guidance has not yet been updated from EPA Guidance Statement No. 54a: technical appendix to Guidance Statement No. 54) (EPA 2016g)
- Technical Guidance: Subterranean fauna survey (the content of this Guidance has not yet been updated from EPA Guideline 12. Issued June 2013) (EPA 2016h)
- Instructions on how to prepare an Environmental Review Document (EPA 2016i)
- Instruction of how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (EPA 2016e).

6.2.2 Other policy and guidance

- WA Environmental Offsets Policy (Government of Western Australia 2011)
- WA Environmental Offsets Guidelines (Government of Western Australia 2014).

6.3 Environmental Scoping Document

Table 6-1 summarises where the requirements of the ESD are addressed in this Section.

Table 6-1: Requirements of the ESD for subterranean fauna

Task number	Requirement	Comments
18	Provide a desktop study of all surveys of the Proposal area undertaken in accordance with EPA Policy. The study should include: • Justification of how those surveys are relevant and representative of the Development Envelope and if they were carried out using methods consistent with EPA Policy • A comprehensive listing of all subterranean fauna known or likely to occur in the habitats present, and identification of conservation significant fauna species likely to occur in the area.	Section 6.4.1 and 6.5.1
19	Conduct Level 2 subterranean fauna surveys in areas not previously surveyed that are likely to be directly or indirectly impacted as a result of the Proposal. Surveys are to be undertaken in accordance with EPA Policy. The surveys should also consider other areas outside the proposed impact footprint as reference areas.	Section 6.4.1.1 and 6.5.1.1
20	Present a review of previous survey information and operational monitoring, and the results of the subterranean fauna surveys and discuss the potential for direct, indirect and cumulative impacts to subterranean fauna (species, populations and assemblages) and habitat including consideration of altered water regimes and water quality (e.g. nutrient flows) as a result of the Proposal.	Sections 6.4.1, 6.4.2, 6.4.4, 6.5.1, 6.5.2, 6.5.3
21	Assess the impacts to subterranean fauna with reference to relevant impacts from the proposed action (including taking into consideration any relevant guidelines, policies and plans and statutory provisions). For species' which are likely to be impacted, provide information, including maps of habitat extent and an appropriate explanation of the likely distribution of species within those habitats including evidence to demonstrate whether there is habitat connectivity.	Sections 6.4.4 and 6.5.3
22	Provide a detailed description of the potential direct, indirect and cumulative impacts to conservation significant and other species within the Proposal area and on a regional scale.	Sections 6.4.2, 6.5.2, 6.4.4 and 6.5.3
23	Demonstrate application of the mitigation hierarchy to avoid and minimise impacts to subterranean fauna.	Section 6.4.6 and 6.5.5
24	Discuss management measures, outcomes/objectives sought to ensure residual impacts (direct and indirect) are not greater than predicted.	Section 6.4.6 and 6.5.5
25	Review the current Mesa A Subterranean Fauna management plan in relation to the requirements of conditions 5 (Troglobitic fauna monitoring) and 6 (Troglofauna habitat retention) in Ministerial Statement 756, to apply to the entire Proposal including but not limited to areas depicted in Ministerial Statement 756, and how these areas are proposed to change.	Section 6.6

Task number	Requirement	Comments
	The Plan(s) should link to the outcomes of the Subterranean Fauna Peer Review. The following should be addressed in the review, consistent with reviews but not limited to:	
	 Subterranean fauna species and populations and assemblages Key habitat parameters for subterranean fauna, including humidity within the underground spaces which form the habitat of the troglobitic fauna and water quantity and quality for stygofauna Studies on the impacts of blasting and mining on the integrity of troglobitic fauna habitat The effectiveness of re-creating troglobitic fauna habitat through such measures as replacement of waste rock, supported by evidence, including reference to previous trials. 	
26	Revise the current Subterranean Fauna management plan to apply to the entire Proposal.	Section 6.5.5
27	Prepare a Mine Closure Plan consistent with DMP and EPA Guidelines for Preparing Mine Closure Plans (2015) which considers: • The use of Mining Exclusion Zones (MEZ) to protect troglofauna habitat • The use of waste rock to maximise survival of, and possible re-colonisation by, troglobitic fauna; and • The need to retain intact material suitable for troglobitic fauna habitat under the pit floor after mining to facilitate movement of troglobitic fauna between the material below the pit floor and the MEZ.	Sections 6.4.5 and 6.5.4
28	Describe the residual impacts for the Proposal and analyse these impacts.	Sections 6.4.4, 6.5.3, 6.4.6, 6.5.5 and 6.7
29	Create an offsets position following application of the mitigation hierarchy.	Sections 6.7 and 13
30	Demonstrate and document in the ERD how the EPA's objective for this factor can be met.	Sections 6.4.6, 6.5.5 and 6.7

6.4 Troglofauna

6.4.1 Receiving environment

6.4.1.1 Surveys and studies

Troglofauna were first recorded at Mesa A in 2003 as by-catch of stygofauna sampling. Since 2003 numerous troglofauna surveys and assessments have been undertaken across the Robe Valley. The combined coverage of these surveys provides a considerable knowledge base of the troglofauna present in the western portion of the Development Envelope. It should be noted that the average sampling intensity per site has increased since the commencement of sampling in 2003 and that the seasonality of surveys has varied between sampling events. Caution must, therefore, be exercised when comparing results from surveys conducted at different times. The surveys are summarised in Table 6-2 and Figure 6-1 to Figure 6-3 show the troglofauna sampling sites in the western portion of the Development Envelope.

Table 6-2: Summary of supporting troglofauna studies

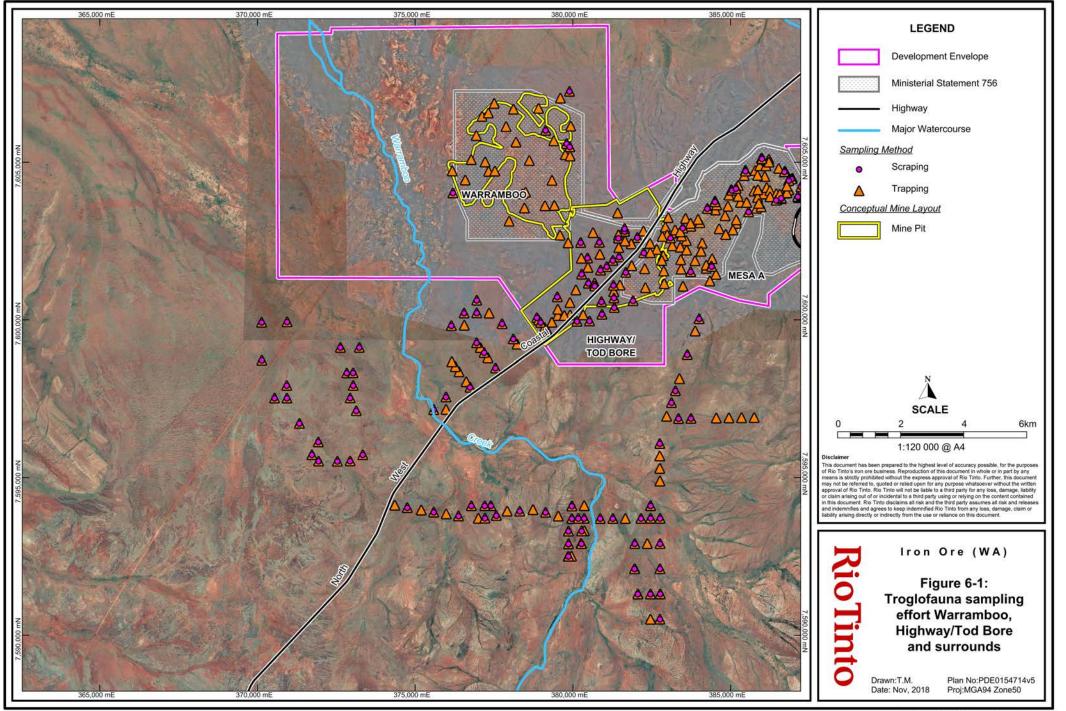
Report	Summary	Survey date
Comparison of Downhole Optical Image Logs in Troglofauna Assessment Holes 2017: Rio Tinto Mesa A, Mesa B and Mesa K Kinetic (2018)	Optical image surveys were conducted at Mesa A, B and K to determine if there was a detectable change in the structure of the boreholes used to monitor troglofauna that may have been induced by mining activities. In 2017, 19 previously monitored holes (ten, three and six holes at Mesa A, B and K respectively) were logged with an optical imaging tool and the images compared with previous monitoring results.	December 2017
Troglofauna habitat data analysis Astron (2017b)	Astron (2017b) undertook a statistical analysis of a set of downhole temperature and relative humidity data from uncased drill holes at Mesa A, Mesa B and Mesa K recorded by Rio Tinto from 2013-2017. The aim of this analysis was to test for impacts of mining at Mesa A on variables which may delimit troglofauna habitat (down hole temperature and relative humidity).	June 2017
Mesa A and Mesa B Annual Compliance Troglofauna Survey 2016 Bennelongia (2017)	Troglofauna sampling in the Mesa A and Mesa B between July and September 2016. A total of 39 drillholes were sampled using 44 traps and 37 net scrapes at Mesa A, and six drillholes were sampled using six traps and five net scapes at Mesa B.	July to September 2016
Mesa A Hub: Warramboo Troglobitic	Biota (2017a) conducted a two-phase troglofauna survey across the Warramboo deposit between June and September 2015 in accordance with relevant EPA guidance and policies. The survey included a desktop review, habitat characterisation and systematic sampling of troglofauna. Survey effort included the deployment of a total of 128 troglofauna traps across 33 drill holes	
Fauna Assessment	and scraping at eight drill holes.	June and October 2015
Biota (2017a)	Habitat characterisation was undertaken, initially using a combination of regional information and site specific geological data. The habitat units identified were assigned a prospectivity to support troglofauna which was then revisited on completion of the field survey sampling component of this study. The prospectivity of the geological units for troglofauna within the study area were categorised as Low, Moderate and High.	

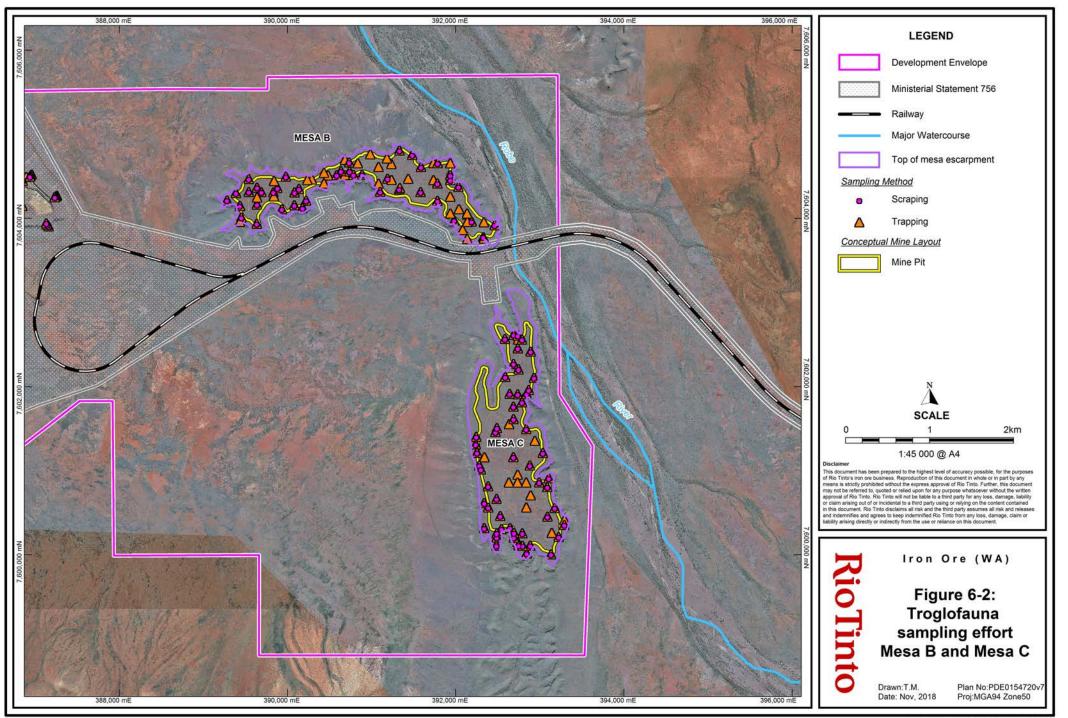
Report	Summary	Survey date
Mesa A Hub: Mesas B and C Troglobitic Fauna Assessment Biota (2017b)	Biota (2017b) conducted a four-phase troglofauna fauna survey across the Mesa B and Mesa C survey areas between June 2015 – September 2016 in accordance with relevant EPA guidance and policies. Over the four sampling phases, 196 traps were installed at Mesa B and 233 at Mesa C. Ninety sites were also sampled using the scraping method. A total of 113 sites were sampled during the study, comprising 50 sites from Mesa B and 63 from Mesa.	April, June, August and October 2015 January, March, July and September 2016
Mesas A and K Targeted Troglofauna Survey Biota (2017c)	Biota (2017c) conducted a two-phase troglofauna survey in disturbed areas at Mesas A and K. A total of 14 sites were sampled at Mesa A and five sites at Mesa K. A total of 86 troglofauna traps were installed with 79 traps recovered. Haul net scraping was also completed for 16 of the 19 sites.	December 2016 to January 2017 February 2017 to March 2017
Mesa A and Warramboo Troglofauna Alignment Bennelongia (2015a)	Taxonomic alignment of troglofauna specimens recorded from Mesa A and Warramboo through further molecular work.	June 2015
Alignment of troglofauna – <i>Ideoblothrus</i> sp. 'Mesa A2' Bennelongia (2015b)	Taxonomic alignment of pseudoscorpions belonging to the genus <i>Ideoblothrus</i> recorded from Mesa A and Mesa B through further molecular work.	August 2015
Mesa A Troglofauna Biennial Compliance Monitoring: 2014 MWH (2014)	Troglofauna sampling at Mesa A and Mesa B between June and September 2014. A total of 41 drillholes were sampled using 132 traps and 40 net scrapes at Mesa A, and ten drillholes were sampled using 26 traps and ten net scapes at Mesa B.	June and September 2014
Mesa A Troglobitic Fauna Compliance Monitoring 2012 Biota (2012b)	Troglofauna sampling in the Mesa A MEZ and Mesa B between May and July 2012. A total of 36 drillholes were sampled using 105 traps at Mesa A, and ten drillholes were sampled using 30 traps at Mesa B.	May and July 2012

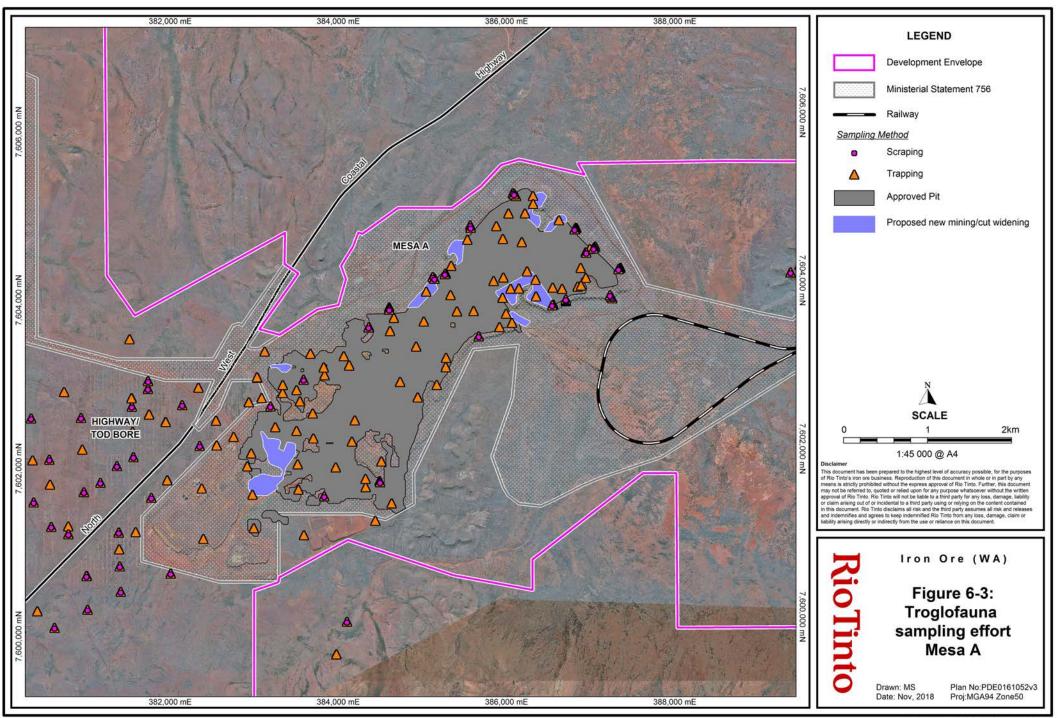
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Report	Summary	Survey date
Mesa A Troglofauna Compliance Report 2010 Biota (2011b)	Troglofauna sampling in the Mesa A MEZ between July and October 2010. A total of 41 drillholes were sampled using 112 traps.	July and October 2010
Mesa A Troglobitic Fauna Studies Update Biota (2007)	Consolidates Mesa A troglofauna sampling data from six sampling phases conducted between 2004 and 2007. Over the six phases of sampling a total of 134 drillholes were sampled using trapping.	December 2006 and February 2007 April and May 2007

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6.4.1.2 Current monitoring and management at the Mesa A/Warramboo Iron Ore Project

The Mesa A/Warramboo Iron Ore Project is managed in accordance with MS 756 and includes a MEZ. The MEZ was established around the periphery of Mesa A, encompassing the escarpments and the south-western part of the deposit where a mesa escarpment is not present. The MEZ was established to protect a number of environmental values including troglofauna habitat and is comprised of CID. In addition to the MEZ, the Mesa A/Warramboo Iron Ore Project includes retention of a zone of troglofauna habitat beneath the pit floor (the sub-floor zone). The sub-floor zone provides connected CID habitat at least 15 m in thickness along the length of the mesa and connects with the MEZ. Together the MEZ and the sub-floor zone provide for retention of approximately 52% by volume of the pre-mining troglofauna habitat.

A Troglobitic Fauna Monitoring Program has been developed and implemented in accordance with Condition 5 of MS 756. The Monitoring Program includes periodic sampling of troglofauna and monitoring of down hole temperature and humidity in the retained habitat in the MEZ. The Monitoring Program also provides for studies on the impacts of blasting on the integrity of troglofauna habitat and the effectiveness of recreating troglofauna habitat through replacement of waste rock. Where relevant to the Proposed Change, the results of troglofauna sampling and habitat monitoring conducted for the Mesa A/Warramboo Iron Ore Project are discussed in Section 6.4.2. Conditions 6 and 8 of MS 756 require mining to be managed to ensure that the actual pit shell contours are within the agreed parameters and that waste rock material is placed to protect and support any projecting 'fingers' of rock in the MEZ. These requirements have been adapted and incorporated into the Mesa A Hub draft EMP and the Mesa A Hub Closure Plan respectively.

6.4.1.3 Habitat

The likely habitats for troglobitic fauna in the study area were characterised using a combination of regional surface geological mapping and site specific data including mapping of thickness above water table of prospective geological units, stratigraphic logging, images and information from drill holes and troglofauna survey results (Biota 2017a, 2017b). The mapping of habitat prospectivity is a comprehensive approach to assessing troglofauna habitat using the collation and integration of all available datasets, including 2D and 3D geological / geophysical data, geological modelling outputs (e.g. using software similar to Leapfrog modelling software) and the physical features of geological formations. This approach is more comprehensive than the often simplistic approach using only 2D surface geological mapping to simply define 'habitat'. A more detailed description of the habitat modelling methodology followed is provided in Appendix 7.

Geological units within the survey areas were categorised as Low, Moderate and High prospectivity for troglofauna based on the following characteristics (Biota 2017a, 2017b; Table 6-3):

- A. Presence of mesocaverns, vugs and interstitial spaces.
- B. Known hydration, weathering or significant cavity zones.
- C. Presence of clay lenses or impeding layers to maintain stable humidity.
- D. The known occurrence of troglofaunal communities from equivalent rock types during past Pilbara surveys.
- E. Occurs above water table within the survey area.

Table 6-3: Troglofauna habitat prospectivity definitions (Biota 2017a, 2017b)

Prospectivity	Definition
High	Majority (four or five) categories confirmed for the geological unit, including E. Troglofauna routinely recorded from same rock type (D).
Medium	Suitable geology likely or known to occur above the water table in the survey area (E). Geology known to have interstices or vugs (A) and troglofauna have occasionally been detected in similar rock types previously (D). Geology may be subject to seasonal inundation (e.g. alluvium and colluvium). Where known, units of high prospectivity were categorised as medium if less than 5 m in thickness.
Low	Suitable geology only occurs B in the survey area. Rock type may have (B), (C) and (E) characteristics but locally lacking suitable habitat space. Troglofauna not known from previous studies sampling of the same geology.

Habitat prospectivity is determined by intrinsic features of the geological strata. Based on the characteristics listed above, three geological units were identified as high and medium troglofauna habitat prospectivity in the western portion of the Development Envelope:

- Robe Pisolite
 - o greater than 5 m thickness (High prospectivity)
 - o less than 5 m thickness (Medium prospectivity)
- Alluvium (Qr) (Medium prospectivity)
- Colluvium (Qg) (Medium prospectivity).

Robe Pisolite (or CID), alluvium and colluvium have been recognised by the EPA as potential troglofauna habitat during past assessments (Biota 2017b). The Robe Pisolite is likely to be the primary habitat for troglofauna in the western portion of the Development Envelope. The 5 m thickness threshold for designating Robe Pisolite as high or medium prospectivity was selected as a conservative threshold based on consideration of:

- The physical dimensions of troglofauna relative to the volume of habitat represented by habitat that is laterally connected with a thickness of 5 m
- Sampling results from the Warramboo and Highway/Tod Bore area where troglofauna have been recorded in areas with Robe Pisolite thickness of less than 5 m and in some areas with Pisolite thickness less than 2 m
- Expert opinion regarding suitable habitat.

Robe Pisolite with thickness >5 m is considered to represent high prospectivity troglofauna habitat. Figure 6-4 shows a plan view of the pre-mining extent and thickness of the troglofauna habitat (Robe Pisolite) at Mesas B and C in relation to the proposed mine pit outlines. Figure 6-5 to Figure 6-8 show typical cross-sections of the Robe Pisolite within Mesas B and C. The figures show that Robe Pisolite is present across the entirety of each mesa formation and there are no known geological barriers or faults within Mesas B and C.

The Priority 1 PEC, the Subterranean invertebrate community of pisolitic hills in the Pilbara, occurs in the Warramboo and Highway/Tod Bore area while the Priority 1 PEC,

the Subterranean invertebrate community of mesas in the Robe Valley region, occurs at Mesas B and C (Figure 6-9)⁸. The locations of these PECs broadly align with the occurrence of pisolite in the area.

The remaining geological units in the western portion of the Development Envelope (Lacustrine deposits (Qi), Eluvium (Qp), Alluvium (Qpt), Conglomerate (Kn and Kny), Ashburton (Wa), Warramboo Sandstone (Ma), Kiangi Creek Formation (Mk) and Granite (Pg)) were identified as low troglofauna habitat prospectivity. Troglofauna have been recorded in these units, however, the physical characteristics of the units suggest they are unlikely to provide core troglofauna habitat Biota (2017a).

Figure 6-10, Figure 6-11 and Figure 6-12 show the modelled troglofauna habitat prospectivity for Warramboo, Highway/Tod Bore and surrounds and Mesas B and C respectively. The figures show the habitat prospectivity as determined from regional surface geology and site specific data including mapping of thickness of prospective geological units, stratigraphic logging, images and information from drill holes and troglofauna surveys. The figures also identify the limit of high confidence habitat modelling, the area over which the Proponent has a high density of drill holes and thus high confidence in the data.

Habitat prospectivity mapping was verified by overlaying specimen results and null records on the habitat prospectivity mapping. Further details of the troglofauna habitat modelling methodology are provided in Appendix 7.

Warramboo, Highway/Tod Bore

Figure 6-13 shows troglofauna records overlaid on modelled troglofauna habitat prospectivity in the vicinity of Warramboo and Highway/Tod Bore. The survey results support the habitat model described above with 87% of conservation significant and potential SRE species recorded in modelled high prospectivity habitat.

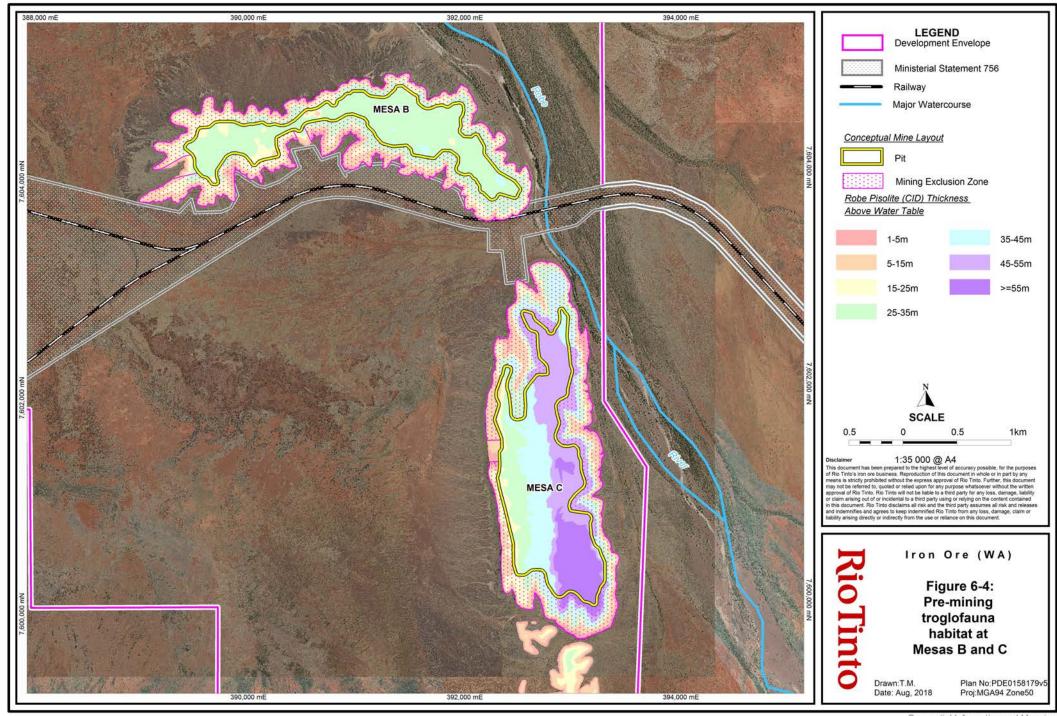
As the habitat model was developed partly from two-dimensional mapping layers, the model can provide a two-dimensional estimate of habitat, that is, an area estimate. The habitat model indicates that the following areas of troglofauna habitat prospectivity currently exist within the limit of high confidence habitat modelling:

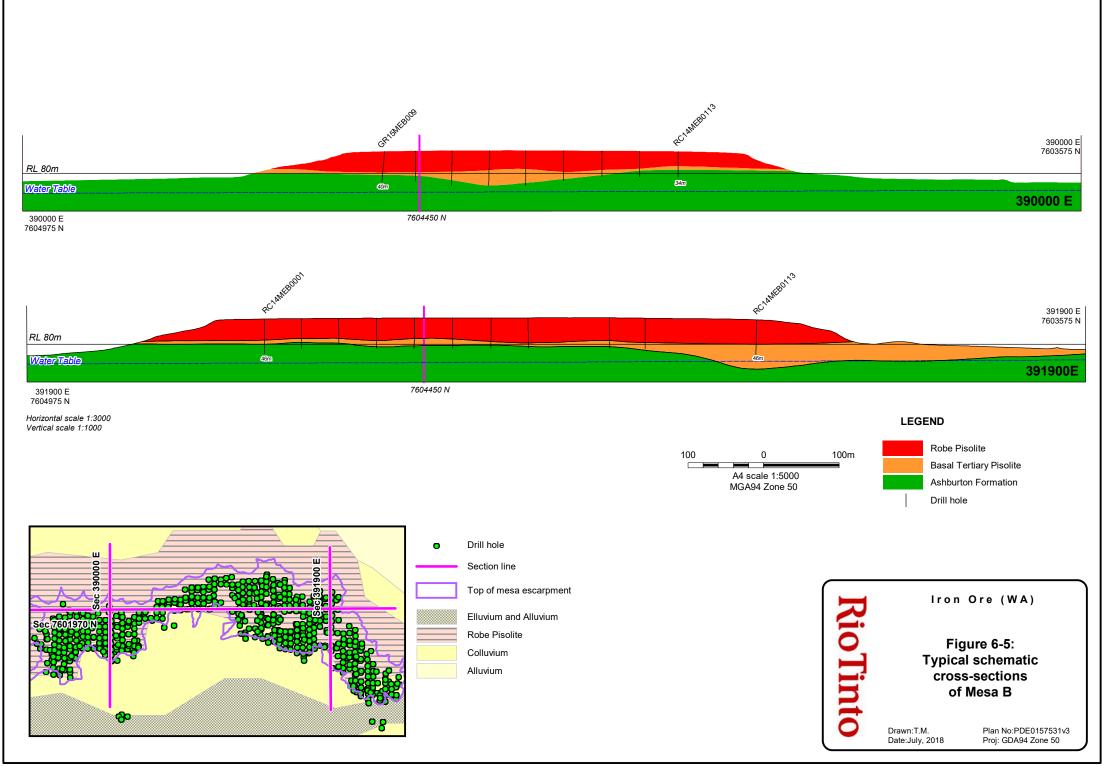
- Approximately 6,136 ha of high prospectivity habitat
- Approximately 9,620 ha of medium prospectivity habitat
- Approximately 54 ha of modelled low prospectivity habitat.

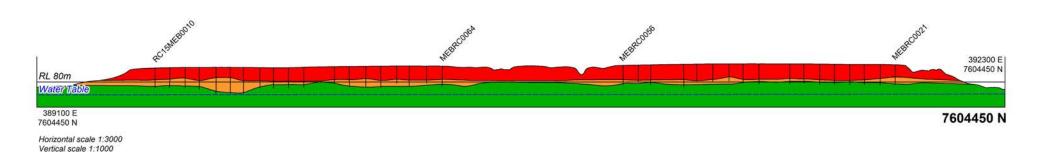
The above area estimates exclude modelled high and medium suitability habitat currently mined under MS 756.

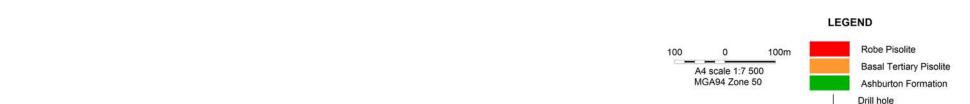
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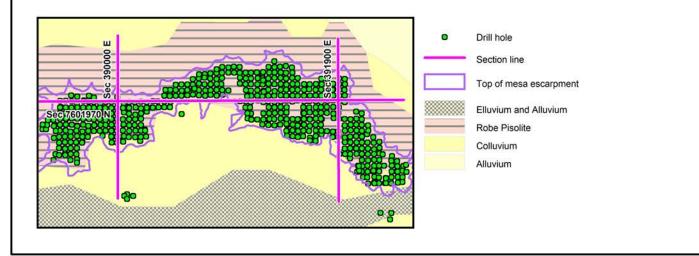
⁸ PEC buffers are shown on the map rather than PEC boundaries as the Conditions for supply of PEC location information allow only buffers to be shown in public reports.

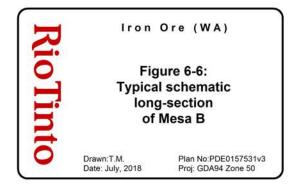


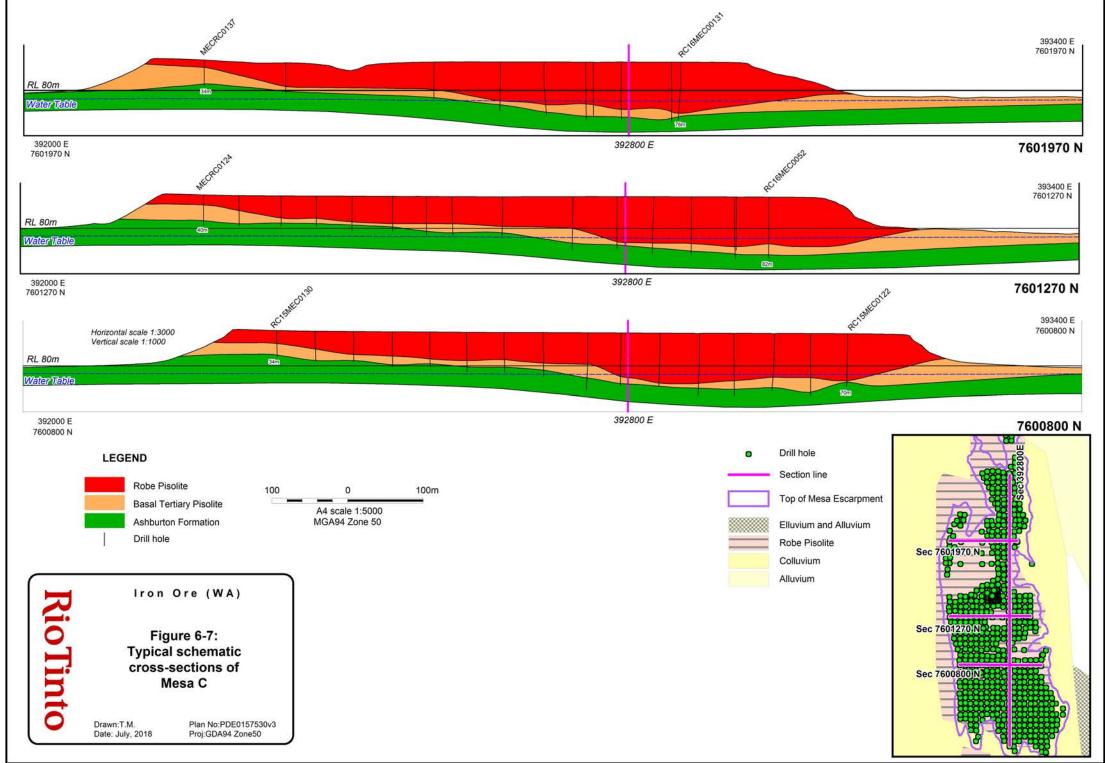


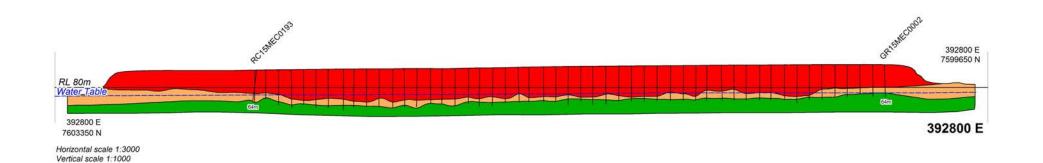


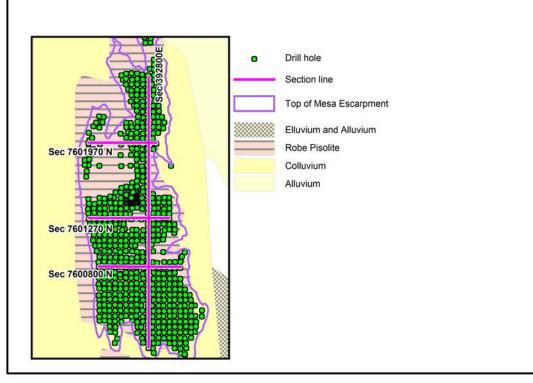


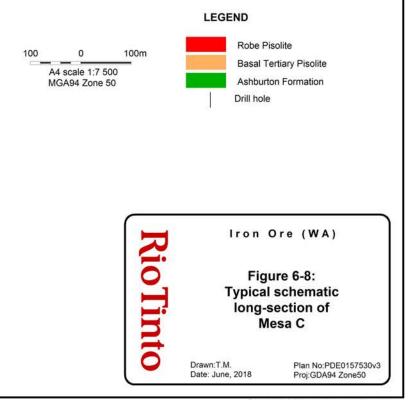


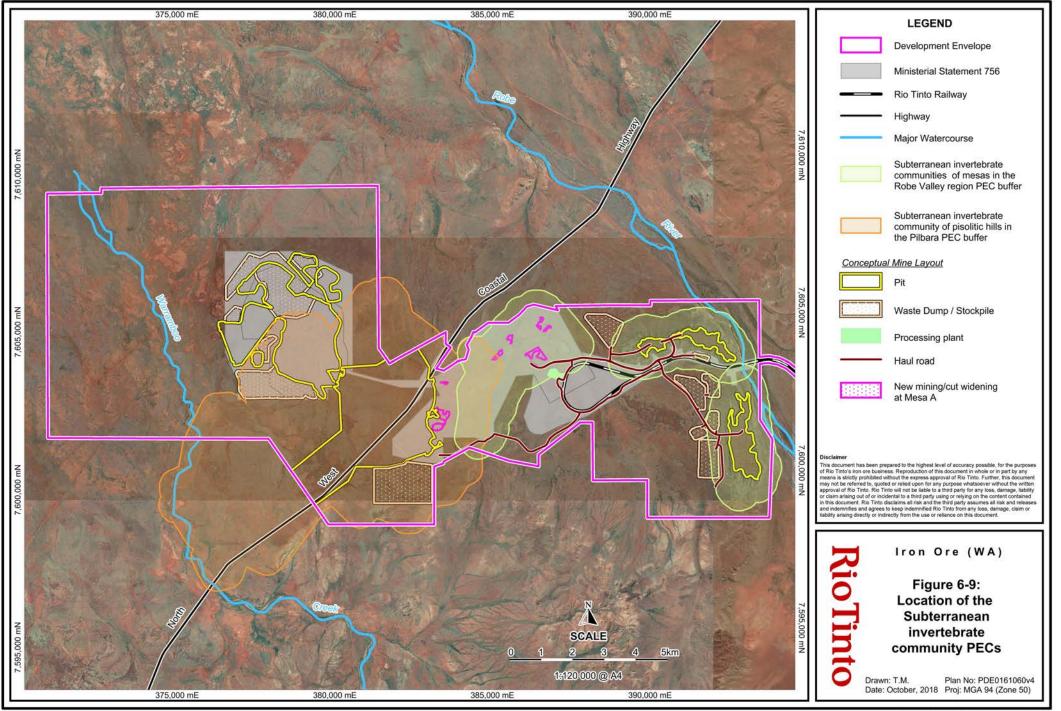


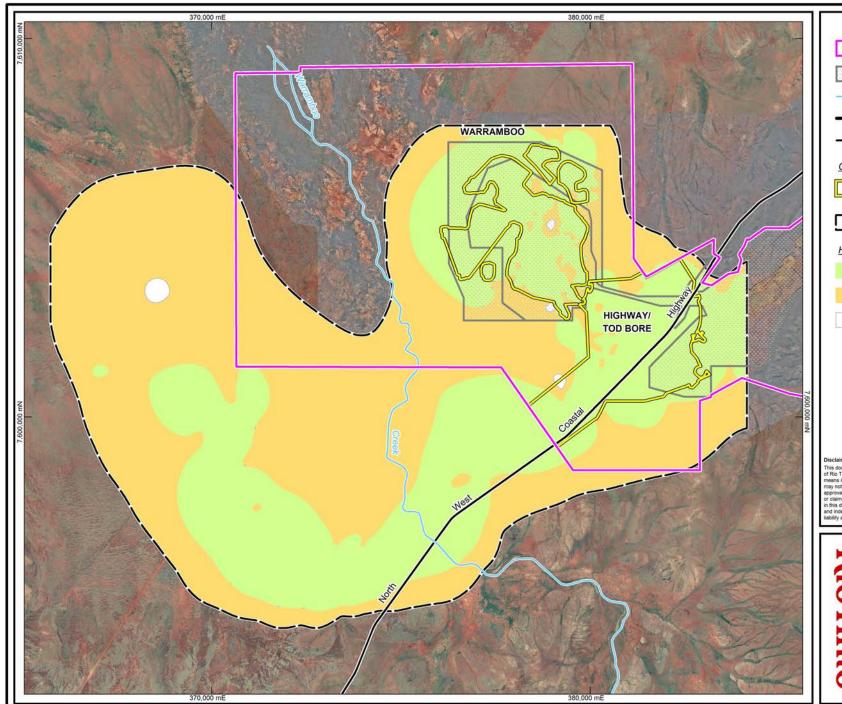


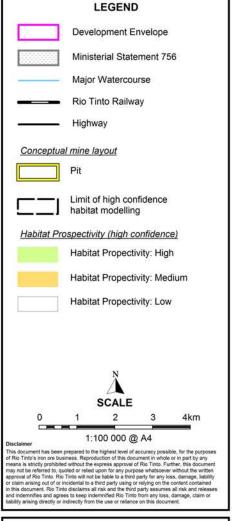










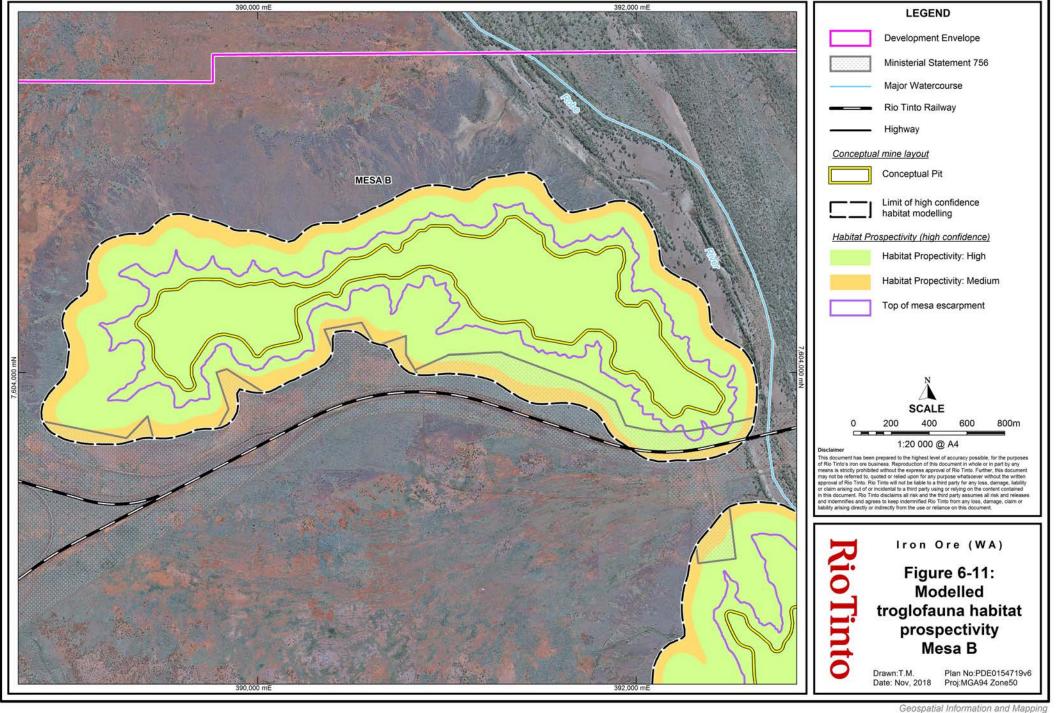


RioTinto

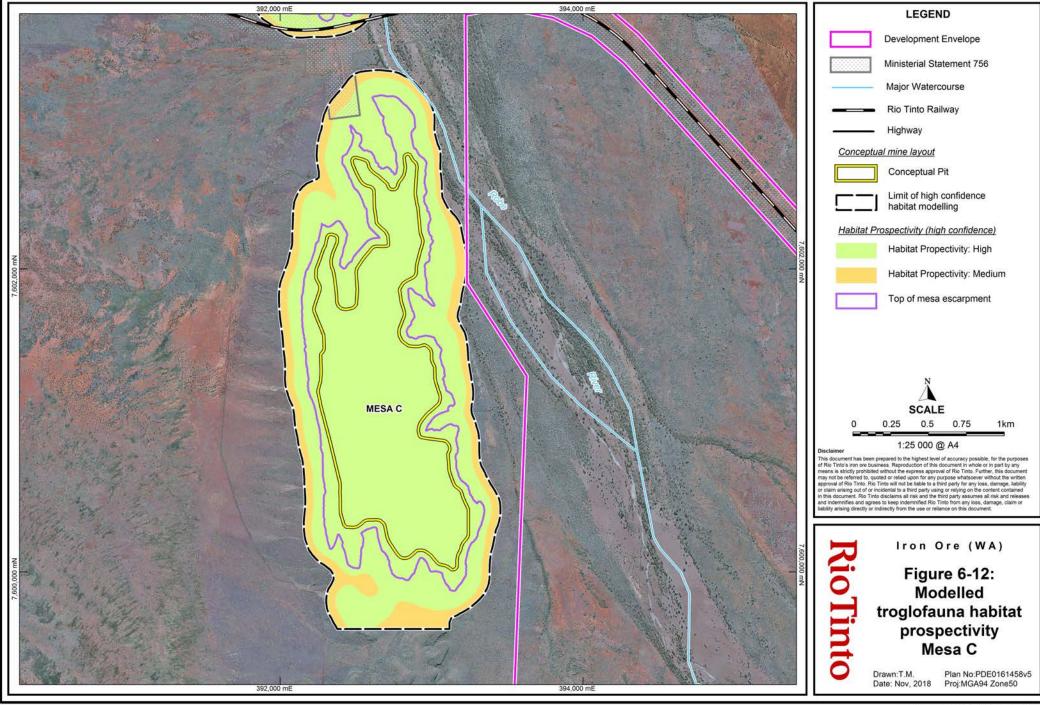
Iron Ore (WA)

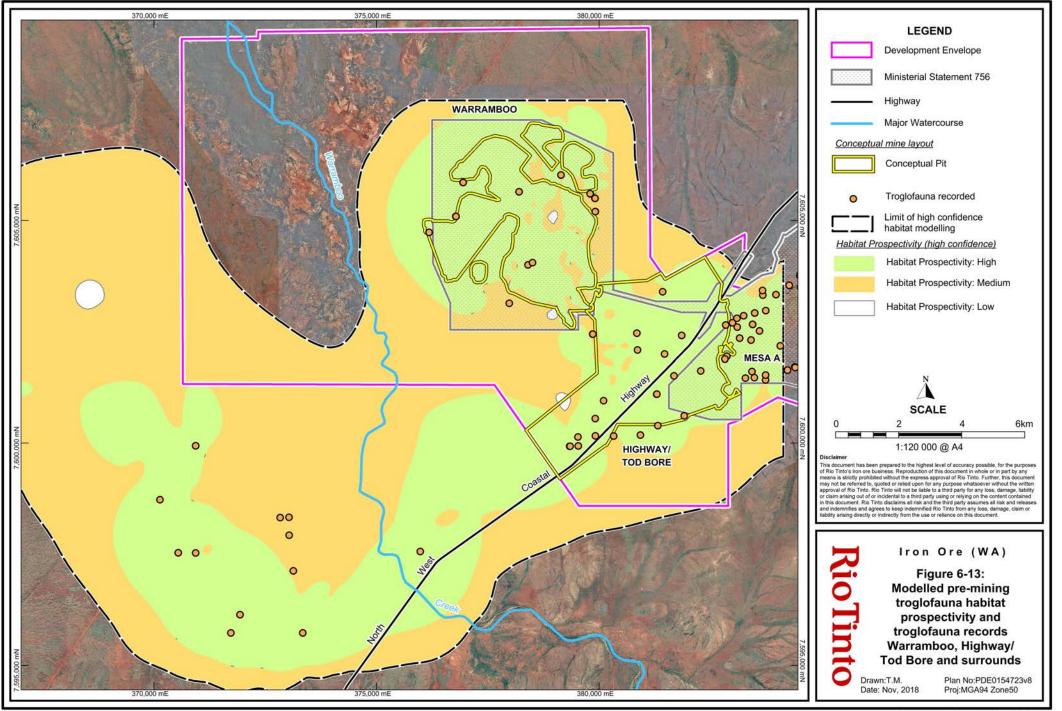
Figure 6-10:
Modelled pre-mining
troglofauna habitat
prospectivity Warramboo,
Highway/ Tod Bore
and surrounds

Drawn:T.M. Date: Nov, 2018 Plan No:PDE0161068v4 Proj:MGA94 Zone50



392,000 mE





Mesa B and Mesa C

Figure 6-14 shows troglofauna records overlaid on modelled troglofauna habitat prospectivity in the vicinity of Mesas B and C. The habitat model indicates that the following areas of troglofauna habitat prospectivity occur in the vicinity of Mesas B and C:

- Approximately 618 ha of modelled high prospectivity habitat
- Approximately 809 ha of modelled medium prospectivity habitat⁹
- Approximately 1208 ha of modelled low prospectivity habitat¹⁰.

Molecular evidence for some troglobitic orders indicates that there is unlikely to be continuous gene flow between the mesas of the Robe Valley. However, five species of conservation significance - either listed as Threatened or with potential SRE status occur on both Mesas B and C:

- Paradraculoides bythius listed as Vulnerable under Schedule 3 of the WC Act
- Hubbardiidae gen. nov. sp. 'SCH052'
- Theriidae sp. 'AT001'
- Haplodesmidae sp. 'DIHAP001'
- Curculionidae sp. 'CCU004/005'.

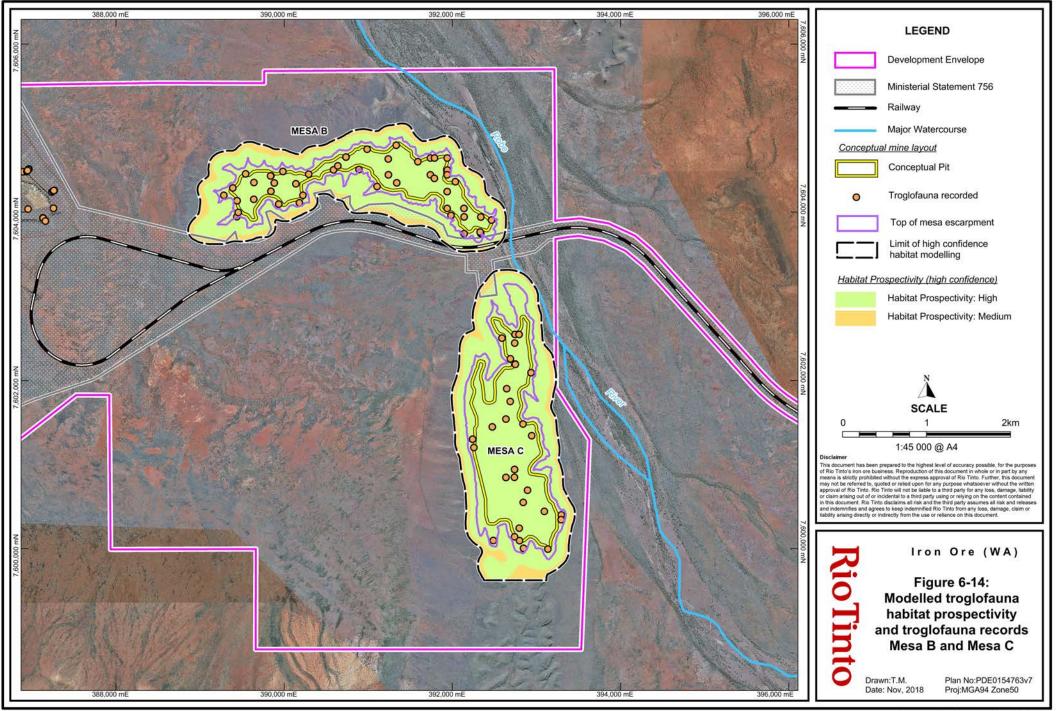
The occurrence of these species on both mesas suggests that the habitats in Mesas B and C may have some connection or were, in geological time, recently connected. Habitat analysis at Mesas B and C to date has not been able to determine the level of connectivity between the mesas and the surrounding colluvium and alluvium (medium habitat prospectivity) (Biota 2017b). In previous studies throughout the Pilbara, areas of weathering or hydrated zones have been identified as potentially occurring in connection with superficial geologies such as colluvium and alluvium and provide possible avenues of gene flow (Biota 2017b).

Although a troglofauna sampling program is underway sampling medium prospectivity habitat between Mesas B and C to examine the degree of habitat connectivity for Mesas B and C, there are currently insufficient data to determine the degree of habitat connectivity and utilisation of the habitat. Given there are insufficient data to determine the degree of habitat connectivity between Mesas B and C and given that proposed mining at Mesas B and C will impact solely on high prospectivity habitat, only modelled high prospectivity habitat is considered when assessing potential impacts on troglofauna at Mesas B and C. This conservative approach allows modelling to be done using a three-dimensional estimate of pisolite thickness with outputs as habitat volume (Section 6.4.2.1).

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⁹ The model domain crops the modelled medium prospectivity habitat; it is likely medium prospectivity habitat continues beyond the current model domain.

¹⁰ The model domain crops the modelled low prospectivity habitat; it is likely low prospectivity habitat continues beyond the current model domain.



Mesa A

Robe Pisolite is the primary habitat for troglofauna at Mesa A. The Mesa A/Warramboo Iron Ore Project approved under MS 756 was designed to retain a total of at least 50% troglofauna habitat behind the Mesa A escarpment and beneath the pit floor as part of the approved activities. The current approved configuration of habitat to be retained is shown in Attachment 2, Figure 3 of MS 756 and reproduced here as Figure 6-15.

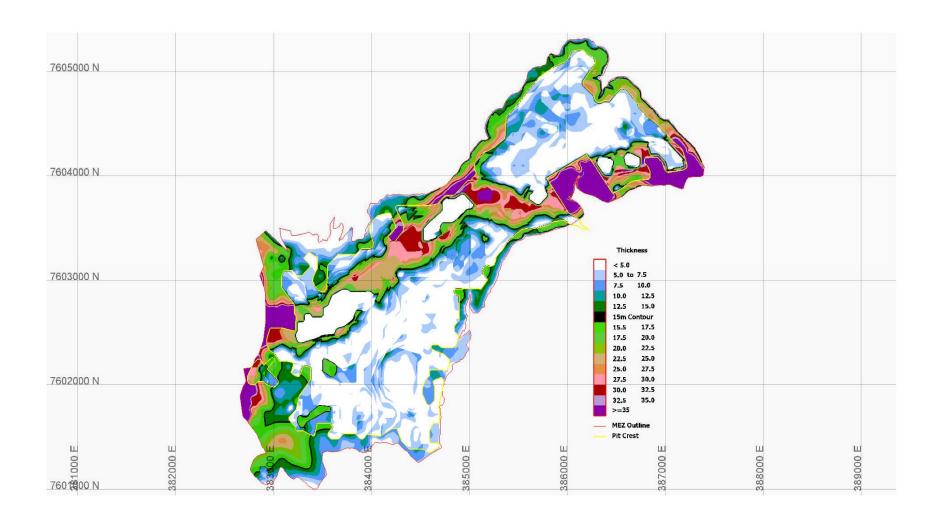


Figure 6-15: Current approved configuration of troglofauna habitat to be retained – Mesa A

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6.4.1.4 Records

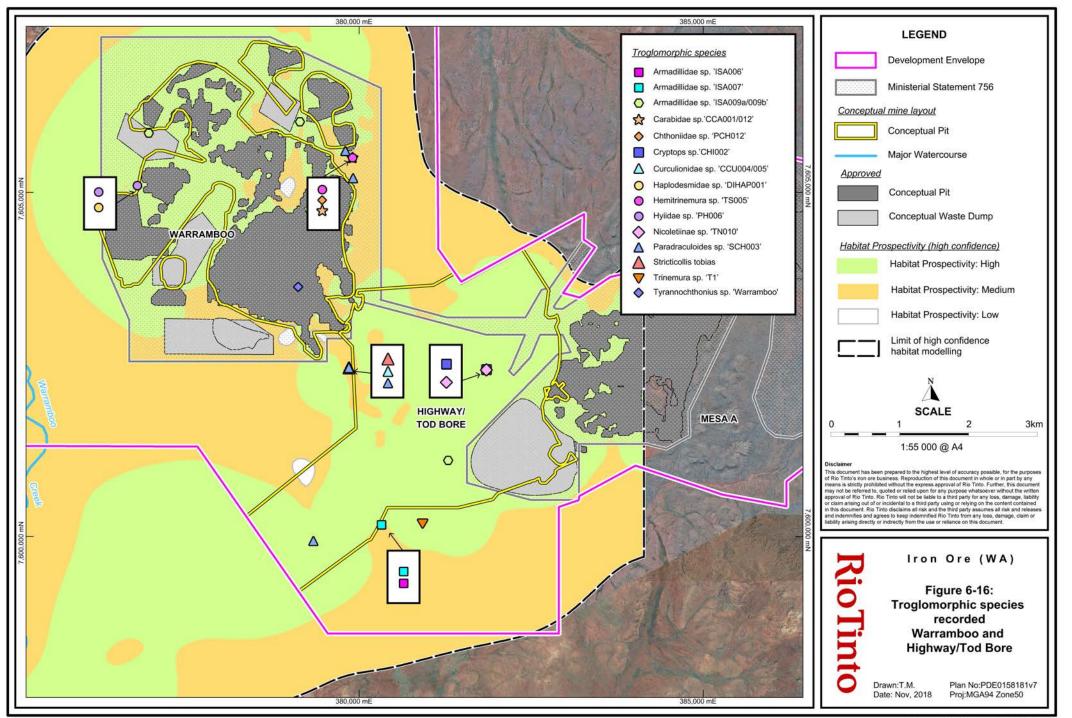
Warramboo, Highway/Tod Bore

A total of 22 troglomorphic species level taxa are known from the Biota (2017a) survey area which includes the Warramboo and Highway/Tod Bore area and part of Mesa A. Of these, 15 species have been recorded in the Warramboo and Highway/Tod Bore area, including 14 potential SREs and one widespread species (Table 6-4 and Figure 6-16).

One widespread species was recorded from the survey area as indicated in Table 6-4. This species is globally widespread and is unlikely to represent a true troglobite or SRE. The potential SRE species are treated as troglobitic and SRE fauna for the purposes of conservative Environmental Impact Assessment.

Table 6-4: Troglomorphic species recorded from Warramboo and Highway/Tod Bore

Order	Species	Conservation significant / SRE	Known locations	
Chilopoda	Cryptops sp.'CHI002'	Potential SRE	Highway/Tod Bore	
	Carabidae sp.'CCA001/012'	Potential SRE	Warramboo Also recorded from Mesa B	
Coleoptera	Curculionidae sp. 'CCU004/005'	Potential SRE	Highway/Tod Bore Also recorded from Mesas A , Mesa B and Mesa C.	
	Stricticollis tobias	Widespread	Highway/Tod Bore Introduced species with a worldwide distribution.	
	Armadillidae sp. 'ISA006'	Potential SRE	Highway/Tod Bore	
Isopoda	Armadillidae sp. 'ISA007'	Potential SRE	Highway/Tod Bore	
isopoda	Armadillidae sp. 'ISA009a/9b'	Potential SRE Warramboo and Highway/Tod Bore Also recorded from Me A		
Polydesmida	Haplodesmidae sp. 'DIHAP001'	Potential SRE	Warramboo Also recorded from Mesa B, Mesa C and Hardey River (215 km south-east of Warramboo)	
	Chthoniidae sp. 'PCH012'	Potential SRE	Warramboo	
Pseudoscorpiones	Tyrannochthonius sp. 'warramboo'	Potential SRE	Warramboo	
	Hyiidae sp. 'PH006'	Potential SRE	Warramboo	
Schizomida	Paradraculoides sp. 'SCH003'	Potential SRE	Warramboo and Highway/Tod Bore	
	Hemitrinemura sp. 'TS005'	Potential SRE	Warramboo	
Zygentoma	Nicoletiinae sp. 'TN010'	Potential SRE	Highway/Tod Bore Also recorded from Mesa B	
	Trinemura sp. 'T1'	Potential SRE	Highway/Tod Bore	



A total of 49 troglomorphic species are known from Mesas B and C (Table 6-5, Figure 6-17, Figure 6-18 and Figure A7-1 and Figure A7-2 in Appendix 7), including:

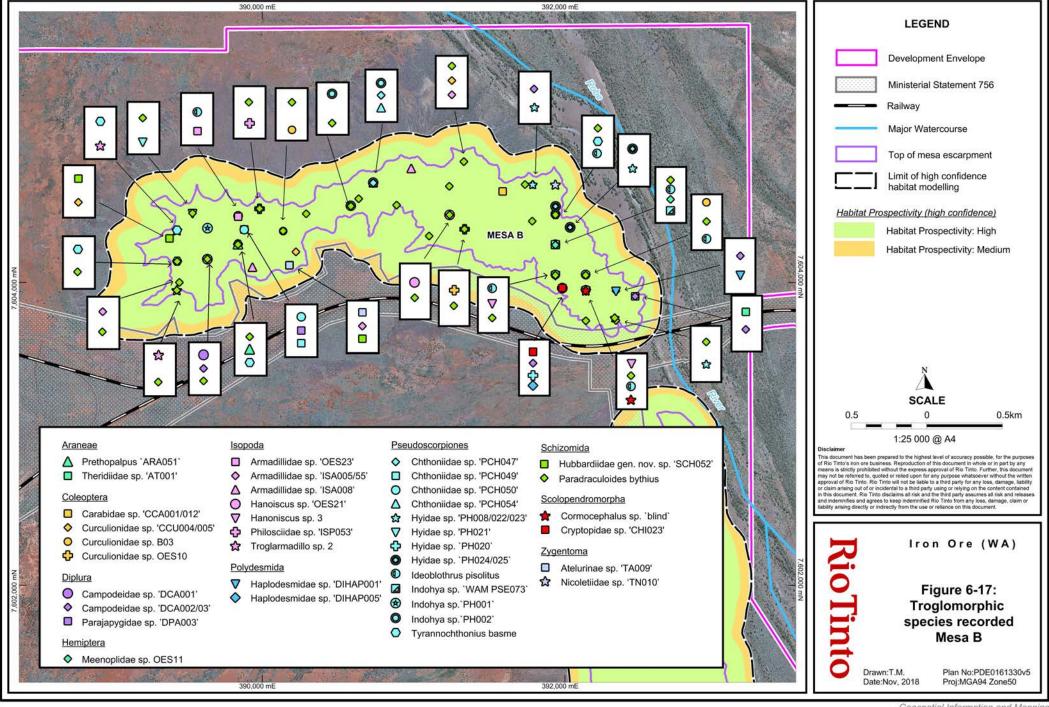
- One conservation significant species: Paradraculoides bythius listed as Vulnerable under Schedule 3 of the WC Act
- One confirmed SRE species: Ideoblothrus pisolitus
- 47 potential SRE species.

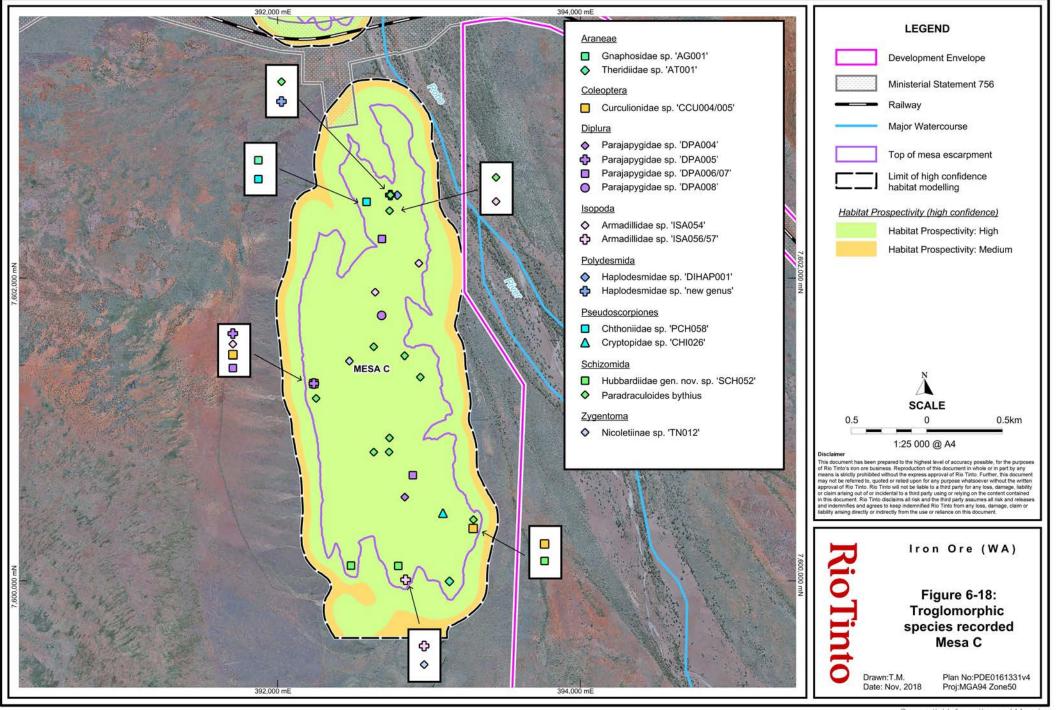
Table 6-5: Troglomorphic species recorded from Mesas B and C

Order	Species	Conservation significant / SRE	Known locations
	Gnaphosidae sp. 'AG001	Potential SRE	Mesa C
Araneae	Prethopalpus sp. 'ARA051'	Potential SRE	Mesa B
	Theriidae sp. 'AT001'	Potential SRE	Mesa B and C
	Carabidae sp. 'CCA001/012'	Potential SRE	Mesa B Also recorded from Warramboo
Coleoptera (Beetles)	Curculionidae sp. 'CCU004/005'	Potential SRE	Mesa B and Mesa C Also recorded from Highway/Tod Bore
	Curculionidae sp. 'OES10'	Potential SRE	Mesa B Also recorded from Mesa A and Mesa K.
	Curculionidae sp. B03	Potential SRE	Mesa B
	Campodeidae sp. 'DCA001'	Potential SRE	Mesa B
	Campodeidae sp. 'DCA002/03	Potential SRE	Mesa B
	Parajapygidae sp. 'DPA003'	Potential SRE	Mesa B
Diplura	Parajapygidae sp. 'DPA004	Potential SRE	Mesa C
	Parajapygidae sp. 'DPA005'	Potential SRE	Mesa C
	Parajapygidae sp. 'DPA006/07'	Potential SRE	Mesa C
	Parajapygidae sp. 'DPA008'	Potential SRE	Mesa C
Hemiptera	Meenoplidae sp. 'OES11'	Potential SRE	Mesa B Also recorded from Mesa A and Mesa K

Order	Species	Conservation	Known locations
Cruoi		significant / SRE	Tanown roodalono
	Armadillidae sp. 'ISA005/55'	Potential SRE	Mesa B
	Armadillidae sp. 'ISA008	Potential SRE	Mesa B
	Armadillidae sp. 'ISA054	Potential SRE	Mesa C
Isopoda	Armadillidae sp. 'ISA056/57'	Potential SRE	Mesa C Also recorded from Mesa H (approximately 28 km east)
	Armadillidae sp. 'OES23'	Potential SRE	Mesa B
	Hanoniscus sp. '3'	Potential SRE	Mesa B
	Hanoniscus sp. 'OES21'	Potential SRE	Mesa B
	Philosciidae sp. 'ISP053'	Potential SRE	Mesa B
	Troglarmidillo sp.	Potential SRE	Mesa B
Polydesmida	Haplodesmidae sp. 'DIHAP001'	Potential SRE	Mesa B and Mesa C Also recorded from Warramboo and Hardey River (approximately 202 km south-east).
(Millipedes)	Haplodesmidae sp. 'DIHAP005'	Potential SRE	Mesa B
	Haplodesmidae sp. 'new genus'	Potential SRE	Mesa C
	Chthoniidae sp. 'PCH047'	Potential SRE	Mesa B
	Chthoniidae sp. 'PCH049'	Potential SRE	Mesa B
	Chthoniidae sp. 'PCH050'	Potential SRE	Mesa B
	Chthoniidae sp. 'PCH054'	Potential SRE	Mesa B
Pseudoscorpiones	Chthoniidae sp. 'PCH058'	Potential SRE	Mesa C
	Indohya sp.`PH001`	Potential SRE	Mesa B
	Indohya sp.'PH002'	Potential SRE	Mesa B
	Hyiidae sp. 'PH008/022/023'	Potential SRE	Mesa B
	Hyidae sp. 'PH020'	Potential SRE	Mesa B

Order	Species	Conservation significant / SRE	Known locations
	Hyidae sp. 'PH021'	Potential SRE	Mesa B
	<i>Hyidae</i> sp. `PH024/025`	Potential SRE	Mesa B
	Ideoblothrus pisolitus	Confirmed SRE	Mesa B
	Indohya sp. 'WAM PSE073'	Potential SRE	Mesa B
	Tyrannochthonius basme	Potential SRE	Mesa B Also recorded from Congo Bore, south of Mesa A.
	Hubbardiidae gen. nov. sp. 'SCH052'	Potential SRE	Mesa B and C
Schizomida	Paradraculoides bythius	Conservation significant (Schedule 3 - Vulnerable)	Mesa B and C
	Cormocephalus sp. `blind`	Potential SRE	Mesa B
Scolopendromorpha (Centipedes)	Cryptopidae sp. 'CHI023'	Potential SRE	Mesa B
	Cryptopidae sp. 'CHI026'	Potential SRE	Mesa C
	Ateluriininae sp.	Potential SRE	Mesa B
Zygentoma (Silverfish)	Nicoletiinae sp. 'TN010'	Potential SRE	Mesa B Also recorded from Highway/Tod Bore
	<i>Nicoletiinae</i> sp. 'TN012'	Potential SRE	Mesa C





Mesa A

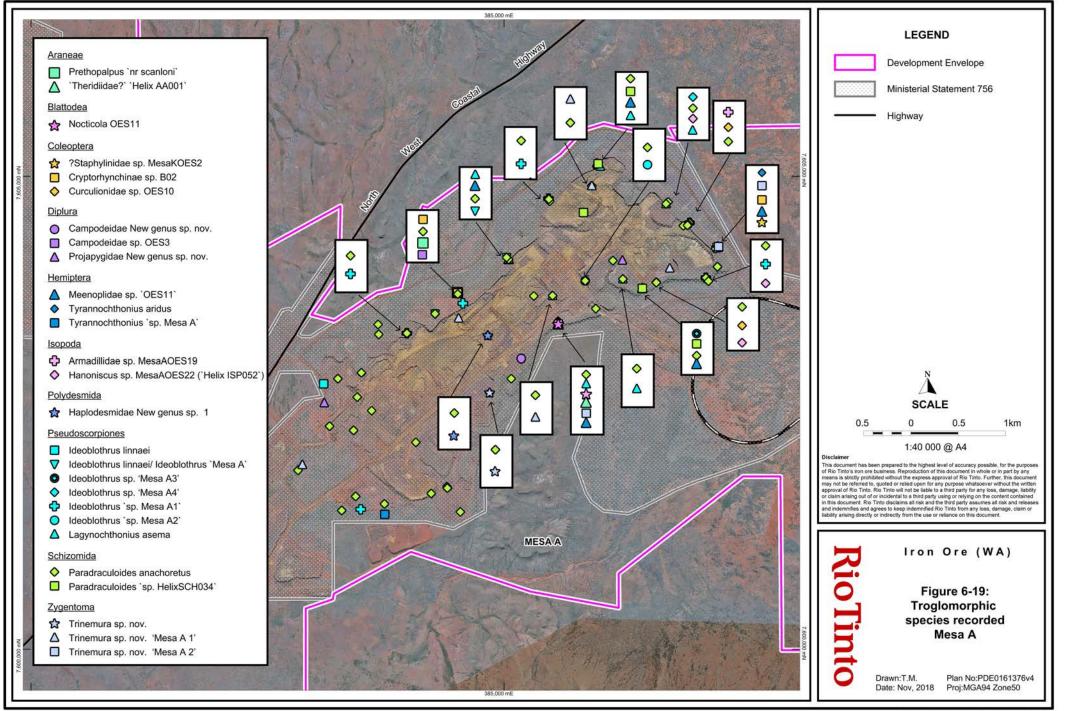
Troglofauna were first recorded at Mesa A in 2003 as by-catch of stygofauna sampling. Multiple phases of targeted troglofauna sampling were conducted at Mesa A during 2005 2006 and 2007 as part of the Environmental Impact Assessment for the Mesa A/Warramboo Iron Ore Project. Biennial troglobitic fauna sampling in the MEZ commenced in October 2010 in accordance with the approved Mesa A Troglofauna Management Plan (Biota 2009a) required by Condition 5 1 of MS 756. A total of 27 troglomorphic species are currently known from Mesa A (Table 6-6, Figure 6-19 and Figure A7-3 in Appendix 7) including:

- Seven confirmed SRE species, including five conservation significant species listed as Threatened species (Vulnerable under Schedule 3 of the WC Act), or as Priority species (Priority 1)
- 20 potential SRE species.

Table 6-6: Troglomorphic species recorded from Mesa A

Order	Species	Conservation Significance / SRE status	Known locations		
	Prethopalpus nr scanloni	Potential SRE	Mesa A		
Araneae	`Theridiidae?` `Helix AA001`	Potential SRE	Mesa A		
Blattodea	Nocticola OES11	Potential SRE	Mesa A and Mesa K		
	Cryptorhynchinae sp. B02	Potential SRE	Mesa A		
Coleoptera	?Staphylinidae sp. MesaKOES2	Potential SRE	Mesa A and Mesa K		
	Curculionidae sp. OES10	Potential SRE	Mesa A, B and K		
	Campodeidae sp. OES3	Potential SRE	Mesa A		
Diplura	Projapygidae new genus sp. nov.	Potential SRE	Mesa A		
	Campodeidae new genus sp. nov.	Potential SRE	Mesa A		
Hemiptera	Meenoplidae sp. `OES11`	Potential SRE	Mesa A, B and K		
Isopoda	Hanoniscus sp. MesaAOES22 (also called `sp. Helix ISP052`)	Potential SRE	Mesa A		
	Armadillidae sp. MesaAOES19	Potential SRE	Mesa A		
Polydesmida	Haplodesmidae new genus sp. 1	Potential SRE	Mesa A		
Doudocornicas	Ideoblothrus linnaei	Conservation Significant (Priority 1)	Mesa A		
Pseudoscorpiones	Ideoblothrus sp. 'Mesa A'	Conservation Significant (Priority 1)	Mesa A		

Order	Species	Conservation Significance / SRE status	Known locations	
	Ideoblothrus sp. 'Mesa A1'	Confirmed SRE	Mesa A	
	Ideoblothrus sp. 'Mesa A2'	Confirmed SRE	Mesa A	
	Ideoblothrus sp. 'Mesa A3'	Potential SRE	Mesa A	
	Ideoblothrus sp. 'Mesa A4'	Potential SRE	Mesa A	
	Lagynochthonius asema	Conservation Significant (Priority 1)	Mesa A	
	Tyrannochthonius sp. 1 (also called T. `sp. Mesa A`)	Conservation significant (Priority 1)	Mesa A	
	Tyrannochthonius aridus	Potential SRE	Mesa A	
Schizomida	Paradraculoides anachoretus	Conservation Significant (Schedule 3 - Vulnerable)	Mesa A	
	Paradraculoides `sp. HelixSCH034`	Potential SRE	Mesa A	
	Trinemura sp. nov.	Potential SRE	Mesa A	
Zygentoma	Trinemura sp. nov. 'Mesa A 1'	Potential SRE	Mesa A	
	Trinemura sp. nov. 'Mesa A 2'	Potential SRE	Mesa A	



6.4.2 Analysis of Robe Valley troglofauna habitats and monitoring results

Historical monitoring and management of troglofauna impacts at Mesa A, Mesa K and other projects in the Robe Valley are relevant to the assessment and mitigation of impacts associated with this Proposed Change. The following sections provide a comparison of habitats within the Robe Valley (6.4.2.1) and a summary of monitoring results adjacent to mining at other sites (6.4.2.2).

6.4.2.1 Habitat comparison of Robe Valley mesas

Mesas A, B and C are part of a series of mesas that are remnants of a palaeochannel formed by sedimentary deposition of iron rich material (Robe Pisolite, more generically known as a CID) within the Robe River palaeochannel between ~23 and ~5 million years ago. Subsequent uplift, erosion and surface water flows have removed much of the adjacent erodible basement material, leaving preserved parts of the paleo-river channels as outcropping mesas.

Similar to the other CID mesas of the Robe Valley, and based on the formations being formed as part of the same downstream extension of the Robe River paleo-channel, Mesas A, B and C comprise the same pisolite geology, with similar inter-stratigraphic features consisting of five primary layers:

- The upper hardcap layer: The Hardcap Pisolite (HTP), which is the
 weathered/laterized surface of the Pisolite, generally around 5 10 m in
 thickness, containing secondary soils, silica and iron. The transition between the
 Hardcap Pisolite and the underlying Pisolite is gradational
- The upper Pisolite: Pisolite (Tp / TPH) has a pisolitic texture, cemented together by a goethitic matrix, with internal interstices (relatively high porosity). This zone includes infrequent clay or hydrated/denatured pisolite zones/lenses
- The lower Pisolite zone: Underlying the Pisolite is the Mixed/Massive Pisolite (TPM) this zone is characterised by a limonitic, denatured/massive appearance and clay is common throughout. This contact is also transitional / gradational to the underlying basal Pisolite. This zone may have been subjected to a variable palaeo-water table, which has resulted in a significant hydration effect in comparison to the overlying Tertiary Pisolite/Tertiary Pisolite Hard
- The Pisolite Clay (TPC) is characterised by bands of predominantly clay-rich material mixed throughout pisolite
- The basal Pisolite (TPB) forms the base of the CID palaeochannel, comprising massive clay-rich limonitic pisolite with remnant pisolite textures.

The CID is incised through the Yarraloola Conglomerate into sediments interpreted to be part of the older Proterozoic Ashburton Formation and the Boolgeeda Iron Formation of the Hamersley Group, which forms the majority of the basement to the CID.

One of the key characteristics of geological units known to provide habitat for troglofauna relates to the physical features, particularly the presence of fractures, cavities, vugs or interstices sufficient in size to accommodate troglofauna. Throughout the Pilbara, a range of geological formations contain, or are more likely to be pre-disposed to containing the necessary physical characteristics that have been shown to provide habitat for troglofauna. In the Development Envelope, the Robe Pisolite is considered to be the geological unit that provides primary habitat for troglofauna as it contains the necessary vugs and cavities to accommodate troglofauna. The clay pockets and lenses within the Robe Pisolite may also contribute to the suitability of the habitat for troglofauna as the

retention of water in or on top of certain clay types may assist in maintaining high humidity levels in the subterranean environment.

The presence of potential cavities at Mesas B and C was compared to those at Mesa A using available information from drill hole data to assess whether any physical differences in troglofauna habitat between the mesas were apparent. For comparative purposes, an analysis of the relative percentages per metre logged of potential cavities (as indicated by a change in the downhole caliper reading of greater than 17 mm) in each stratigraphic layer in Mesas A, B and C was undertaken (Table 6-7). The amalgamated data for HTP, TPH, TPM and TPC indicate that the frequency of occurrence of cavities at Mesas B and C is similar to that at Mesa A. The relative distribution of cavities between the strands varies between the mesas with more cavities present in the HTP and TPH and fewer cavities present in the TPC at Mesa B compared with Mesa A. A slightly lower percentage of cavities per metre logged was recorded in all strands at Mesa C compared with Mesa A. Overall, however, the caliper data show cavities are likely to be present in all strands of the CID and the overall occurrence of cavities is similar in each of the mesas.

Table 6-7: Summary of the occurrence of potential cavities at Mesas A, B and C

Strand	Mesa A Caliper > 17mm (% of total metres logged)	Mesa B Caliper > 17mm (% of total metres logged)	Mesa C Caliper > 17mm (% of total metres logged)
Amalgamated data for HTP, TPH, TPM, TPC	1.4%	2.6%	0.8%
Hardcap Pisolite (HTP)	0.5%	2.2%	0.2%
Pisolite (TPH)	1.8%	4.4%	0.6%
Mixed/Massive Pisolite (TPM)	1.6%	1.7%	1.1%
Pisolite Clay (TPC)	1.0%	0.1%	0.6%

Mesas of the Robe Valley, including Mesas A, B and C were formed through the same broad depositional processes and therefore comprise the same geological units with similar stratigraphy, although the relative proportion of each inter-stratigraphic layer varies between the mesas. The basement and channel morphology, relative portions of clays, and secondary alteration features can vary between the mesas which can translate to variability in cavity, void and interstitial proportions, however the key propensity of the Pisolite to host voids and cavities suitable to support troglofauna remains similar between the mesas.

At order level troglofauna assemblages across the Robe Valley are similar (Table 6-8) indicating that habitats on each mesa are similar with a similar range of ecological niches.

Table 6-8: Order level representation of troglofauna across the Robe Valley

Troglomorphic Order	Mesa A	Mesa B	Mesa C	Mesa H	Mesa K
Araneae	✓	✓	✓	✓	✓
Blattodea	✓			✓	✓
Coleoptera	✓	✓	✓	✓	✓
Diplura	✓	✓	✓	✓	
Geophilomorpha					✓
Hemiptera	✓	✓			✓
Isopoda	✓	✓	✓	✓	✓
Opiliones			✓		✓
Polydesmida	✓	✓	✓		✓
Pseudoscorpiones	✓	✓	✓	✓	✓
Schizomida	✓	✓	✓	✓	✓
Scolopendromorpha	✓	✓	✓	✓	✓
Zygentoma	✓	✓	✓	✓	✓

As mining operations and associated troglofauna monitoring have been underway at Mesa A since 2010 and similar troglofauna habitat is present at other mesas within the Robe Valley, including Mesas B and C, results from the monitoring conducted at Mesa A (and at Mesa K) have been used to guide the design of the Proposed Change and management actions at Mesas B and C.

6.4.2.2 Results of monitoring at Mesa A and other Robe Valley locations

Troglofauna were first recorded at Mesa A in 2003 as by-catch of stygofauna sampling. Multiple phases of targeted troglofauna sampling were conducted at Mesa A during 2005 and 2006 as part of the Environmental Impact Assessment for the Mesa A/Warramboo Iron Ore Project. Active mining commenced at Mesa A in February 2010 under MS 756. Monitoring conducted in accordance with the approved Mesa A Troglofauna Management Plan (Biota 2009a) required under Condition 5-1 of MS 756 includes:

- Biennial troglofauna sampling in the Mesa A MEZ
- · Troglofauna sampling in disturbed habitats
- Subterranean habitat monitoring
- Downhole optical image surveys.

The results of the above monitoring as they pertain to the effectiveness of the Mesa A MEZ in maintaining the biological diversity of the subterranean fauna community are discussed below.

Troglofauna abundance in the Mesa A MEZ

Troglofauna sampling commenced at Mesa A prior to commencement of mining and has continued during mining. Given the inherent sampling limitations in the subterranean environment, an analysis of capture rates was undertaken to normalise the data sets in relation to intensity of sampling. Table 6-10 shows the number of troglofauna specimens collected per 100 holes sampled via trapping¹¹ (capture rate) at Mesa A pre-mining and from the MEZ at Mesa A during mining. For most taxa capture rate is very low with some taxa only known from one record over a ten year sampling period; the capture rate for these taxa is estimated to be approximately one specimen per 300 traps. In contrast, Paradraculoides anachoretus was the most abundant taxa with multiple collections from Mesa A during every sampling round. Capture rate for Paradraculoides anachoretus has, therefore, been included in Table 6-9 along with the capture rate for all troglofauna specimens. Table 6-9 shows that the capture rate of between 61.5 to 163.9 specimens per 100 trapped holes for all troglofauna taxa during mining is similar to the capture rate range of between 51.6 to 164.3 specimens per 100 trapped holes pre-mining. The capture rate for Paradraculoides anachoretus of between 34.1 to 122 specimens per 100 trapped holes during mining is similar to the capture rate of between 29.0 to 92.9 specimens per 100 trapped holes pre-mining.

The statistical power of troglofauna sampling is limited by the sampling methodology. Within the limitations presented by current troglofauna sampling methodology¹², the capture rates of troglofauna from the MEZ at Mesa A during mining are similar to those recorded across Mesa A prior to commencement of mining. If capture rate is taken as a measure of abundance then the similar range in capture rates before and during mining indicates that troglofauna abundance during mining is similar to the abundance recorded prior to commencement of mining.

¹¹ Scraping for troglofauna was not routinely applied as a sampling methodology during the pre-mining phase. To allow for comparison between pre-mining and mining phases, capture rates are calculated exclusive of troglofauna captured via scraping.

¹² Limitations include access to the subterranean environment for sampling (only via drill holes); modification of potential habitat through establishment of drill holes; trapping and scraping methodology may not be appropriate for some species depending on species preferences and mobility; sampling bias towards orebodies; difficulty in determining the specific geological strata that specimens originate from.

Table 6-9: Number of troglofauna specimens and individuals of *Paradraculoides* anachoretus recorded at Mesa A per 100 holes sampled via trapping

	Pre-mining							During mining			
Order	Jan 2005	May 2005	Sep 2005	Aug 2006	Feb 2007	May 2007	Oct 2010	Jul 2012	Sep 2014	Sep 2016	
Total number of trapped holes	11	14	49	31	31	36	41	36	41	39	
Total number of troglofauna specimens recorded per 100 trapped holes	54.5	164.3	81.6	80.6	51.6	75.0	63.4	163.9	92.7	61.5	
Total number of Paradraculoides anachoretus specimens recorded per 100 trapped holes	54.5	92.9	36.7	38.7	29.0	58.3	51.2	122.2	34.1	51.3	

Troglofauna diversity in the Mesa A MEZ

Table 6-10 synthesises the troglobitic fauna sampling results from Mesa A to show the troglobitic and troglomorphic Orders collected from Mesa A between 2003 and 2016, that is before and during active mining. The summary is provided at Order level to allow easier comparison of the results than is possible at the lowest taxonomic level. For completeness, the complete set of records identified to species level is provided in Appendix 7. Sampling prior to mining commencing was conducted across the mesa formation, while sampling during mining operations has been conducted in the MEZ. Despite the inherent limitations in sampling troglofauna, the results confirm the persistence of a troglofauna community at Mesa A of similar general composition to that pre-mining.

Table 6-10: Troglobitic and troglomorphic taxa collected from Mesa A (shown at Order level)

	Pre-mining							During Mining				Combined results of
Order	Dec 2003*	Jan 2005	May 2005	Sep 2005	Aug 2006	Feb 2007	May 2007	Oct 2010	Jul 2012	Sep 2014	Sep 2016	orders recorded during mining
Araneae			✓						✓			✓
Blattodea**								✓	✓	✓		✓
Coleoptera					✓	✓				✓	✓	✓
Diplura	✓		✓	✓			✓			✓		✓
Hemiptera**								✓			✓	✓
Isopoda				✓				✓	✓	✓		✓
Polydesmida	✓						✓	✓				✓
Pseudoscorpiones				✓	✓	✓	✓	✓	✓	✓		✓
Schizomida	✓	✓	√	✓	✓	✓	✓	✓	✓	✓	✓	✓
Scolopendromorpha				✓	✓							
Zygentoma			✓	✓	✓	✓						

^{*} Sampling in 2003 was for stygofauna using haul nets; no troglofauna traps were set

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^{**} Prior to 2010, experts considered that these groups were unlikely to contain troglobitic representatives thus no specimens were recorded during pre-mining surveys. Since 2010 a change in expert opinion has meant that potentially troglobitic Blattodea and Hemipterans are collected and retained for further assessment although there is still uncertainty whether these are truly troglobitic or simply edaphabitic (soil dwelling) species.

During the assessment of the Mesa A/Warramboo Iron Ore Project some troglofauna taxa were identified to be 'at risk' as they had only been recorded in the proposed mining area. The proposed MEZ was revised to include the areas around the records of taxa considered to be 'at risk'. Sampling conducted in the MEZ since that time has resulted in collection of additional specimens of some of the taxa originally considered to be at risk. Specifically, at the time of assessment of the Mesa A/Warramboo Iron Ore Project, Lagynochthonius asema was known from two locations (one of which is in-pit), however it is now known from eight locations and Ideoblothrus sp. 'Mesa A1' was known from three locations (one of which is in-pit) and is now known from four locations.

Troglofauna presence in disturbed habitats

The Proponent is currently undertaking further investigations into the re-colonisation of inpit waste dumps/low grade stockpiles and utilisation of the formation beneath the waste dumps/stockpile by subterranean fauna. Troglofauna sampling (most recently Biota 2017c) has been undertaken in disturbed habitats at Mesas A and K to provide an initial assessment of the suitability and use of disturbed habitats post-impact. Sampling in these areas is limited both spatially and temporally by access to active and historical mining areas, number of drill holes and the stability of drill holes drilled into waste dumps. The limited sampling results to date are presented in Table 6-11. Schizomids, isopods, curculionid beetles and hemipterans were recorded from a formerly mined, rehabilitated pit and waste dumps at Mesa K. As Mesa K was historically mined, pre-mining troglofauna sampling records are not available. However, all but two taxa recorded in pits and dumps at Mesa K were also recorded outside of these impact areas. The two remaining taxa (*Curculionidae* `sp. B01` and *Curculionidae* `sp. B04`) have not undergone complete taxonomic comparison with surrounding specimens so it is possible they have also been recorded elsewhere.

At Mesa A, limited sampling in disturbed areas has recorded three schizomid taxa (*Paradraculoides* sp. 'SCH034', *Paradraculoides anachoretus* and *Paradraculoides* sp.) from areas within the mining operation. Three schizomid specimens were collected from two drillholes (MOB03a and MOB03b) which are approximately 10 m apart in the southern part of the Mesa A pit. An additional five schizomid specimens were recorded from a drillhole (RC16MEA004) in the northern part of the Mesa A pit. Genetic analysis of these five specimens from the northern part of the pit determined the presence of two distinct lineages, equating to two species, *Paradraculoides anachoretus* and *Paradraculoides* sp. 'SCH034'. *Paradraculoides anachoretus* has been widely recorded from Mesa A, including during pre-mining baseline sampling. *Paradraculoides* sp. 'SCH034' has also been previously recorded from two sites within the Mesa A MEZ but was not identified as such during pre-mining baseline sampling.

The presence of troglofauna in disturbed in-pit areas demonstrates that potential habitat exists in or under waste dumps and under the pit during mining. However, only limited sampling has been undertaken to date in disturbed habitats; further work is required to evaluate the diversity of troglofauna present in disturbed habitats and utilisation of those habitats by troglofauna. This includes the under-pit habitat at Mesa A; due to the complexities of sampling in an operating pit, sampling to determine whether troglofauna communities persist under the pit as successfully as in the MEZ is currently limited. There is, therefore, currently a greater level of confidence of troglofauna persistence in the retained habitat behind the escarpment at Mesa A (that is, in the MEZ) than beneath the pit floor; this information has been used to guide the design of the MEZs at Mesas B and C.

Table 6-11: Sampling effort (orange squares) in-pit and waste dumps at Mesa K and Mesa A, along with the number and taxa collected

		Sample year									
Site	Impact type	2005	2010	2011	2012	2013	2014	2015a	2015b	2016	
Mesa K					•			•			
MEKRC1721	Rehabilitated waste dump				2x Isopoda sp. 1x Chthoniidae sp. 2x Paradraculoides sp.						
MEKRC1728	Rehabilitated waste dump							1x <i>Phaconeura</i> `sp. OES10`		1x Paradraculoides kryp	
MEKRC1478	Rehabilitated pit floor			1x Hubbardiidae sp. 1x Paradraculoides kryptus	1x Paradraculoides kryptus	2x <i>?Staphylinidae</i> sp. MesaKOES2	1x Paradraculoides kryptus			1x Phaconeura `sp. OES 1x Curculionidae sp. B04 2x Paradraculoides krypt	
MEKRC1486	Rehabilitated pit floor				1x Hemiptera sp. 1x Paradraculoides sp.	1x Hanoniscus `sp. MesaK1` 2x Paradraculoides kryptus	1x Curculionidae sp. OES10 1x Paradraculoides kryptus	1x Paradraculoides kryptus 1x Curculionidae sp. B01			
RC16MEK0001	Waste dump										
RC16MEK0003	Pit floor										
RC16MEK0004	Pit floor										
RC16MEK0005	Pit floor										
Mesa A								•			
MOB EAST PIT 4 (MOB02a)	Pit floor										
MOB WEST PIT 4 (MOB02b)	Pit floor										
MOB EAST PIT 8 (MOB03a)	Pit floor									1x Paradraculoides sp.	
MOB WEST PIT 8 (MOB03b)	Pit floor									2x Paradraculoides sp.	
MOB NORTH PIT 2 (MOB01a)	Pit floor										
MOB SOUTH PIT 2 (MOB01B)	Pit floor										
RC16MEA001	Pit floor										
RC16MEA002	Pit floor										
RC16MEA003	Pit floor										
RC16MEA004	Low grade waste dump ¹								3x Paradraculoides sp. 'SCH034' 1x Paradraculoides anachoretus	1x <i>Paradraculoides</i> sp. 'SCH034'	
RC16MEA005	Pit floor										
RC16MEA006	Pit floor										

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Cite Import type	Insurant towns	Sample year										
Site	Impact type	2005	2010	2011	2012	2013	2014	2015a	2015b	2016		
RC16MEA007	Pit floor											
Middle Robe	Middle Robe											
M2ERC0076	Pit floor											
M2ERC0103	Pit floor											
M2ERC0095	Pit floor											

¹ This hole was drilled through the low grade waste dump, but also partially into the original pisolite geology below the dump.

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Downhole habitat parameters in the Mesa A MEZ

Subterranean temperature and relative humidity data are collected continuously from uncased drill holes in the MEZ at Mesas A and B and in the areas remaining at Mesa K following historical mining to assess the potential effects of mining on the retained troglofauna habitat. The monitoring programs were established specifically to examine potential changes in temperature and humidity in the retained habitat due to exposure of habitat at mine pit faces. The monitoring programs include potential impact sites at Mesa A (and Mesa K) as well as reference sites at Mesa B. Potential impact sites at Mesa A include sites established along several transects that run perpendicular to the pit face, across the MEZ, to the outer part of the mesa escarpment, thus allowing assessment of potential habitat changes with proximity to the pit face.

Monitoring of temperature and humidity in the subterranean environment presents several challenges. Measuring humidity near saturation is difficult, particularly when an accurate down hole temperature measurement is also required. Modifications to the probe installations at Mesas A, B and K have been made over time to improve the accuracy and reliability of the data collected. A significant change to probe installation was made in 2013 to remove interference between the heater on the humidity probe and the temperature sensor. The data collected post 2013 are more accurate than previously collected data; these data have, therefore, been used for data analysis.

Statistical analysis of the temperature and relative humidity data collected post 2013 was undertaken by Astron Environmental Services (Astron 2017b). The aim of the analysis was to test for impacts of mining at Mesa A on down hole temperature and relative humidity. The analysis showed proximity to the Mesa A pit edge did not influence mean down hole temperature or humidity (Astron 2017b). Increased proximity to the pit edge may result in an increase in the variability of the subterranean humidity due to increased connectivity with the surface climate. However, some of the highest variability in humidity was recorded well away (approximately 100 m) from the pit face and increases in variability in some near-pit locations are within the error margins of the humidity sensors (Astron 2017b). Variations in temperature and humidity values at Mesa A were not significantly different from those recorded from a reference (Mesa B) and an historical mining area (Mesa K) (Astron 2017b). It was, therefore, concluded that mining at Mesa A has had little discernible influence on down hole temperature and humidity in the Mesa A MEZ (Astron 2017b).

Optical image surveys have been conducted periodically in drill holes at Mesas A, B and K since 2009 to allow qualitative assessment of the extent and type of fracturing and cavities in the drill holes in retained troglofauna habitat. Comparison of the images between years allows for identification of any variations to the cavities. Ten previously monitored drill holes at Mesa A were surveyed in 2017. Figure 6-20 shows an example of downhole images recorded. The images in Figure 6-20 were recorded in 2016 and 2017 between 5.3m and 10.3m below the top of the casing in drill hole MEARC2740. The images show no visible changes in the shapes or sizes of voids between 2016 and 2017.

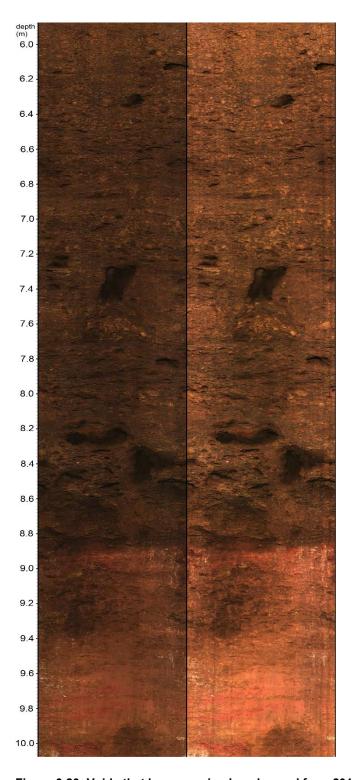


Figure 6-20: Voids that have remained unchanged from 2016 (left) and 2017 (right) in drill hole MEARC2740 at 5.3-10.3m (image supplied by Kinetic Logging Services)

Table 6-12 provides a summary of results from the optical image surveys for the last three years of surveys (Kinetic 2018). Recorded changes were associated with weathering, movement of tree roots and dislodgement of residual dried drilling fluid/mud. Weathering and tree root movement are considered to be a normal variation in the subterranean environment and dislodgement of residual dried drilling fluid/mud is a normal process in drill holes. The images recorded since 2009 show no indications of cavities collapsing (caving in) or generation of anthropogenic fractures of the surrounding rock induced by mining activities.

Table 6-12: Summary of optical image survey results 2015 to 2017 (Kinetic 2018)

Drill hole	Changes identified				
number	2015	2016	2017		
MEARC2740	No detectable change	No detectable change	No detectable change		
MEARC2927	No detectable change	No detectable change	No detectable change		
MEARC4279	No detectable change	Not logged	New root growth 2.7m- 4.2m. Reduced root growth 4.2m-6.8m. No changes to cavities and voids		
MEARC4286	No detectable change	Not logged	No detectable change		
MEARC4288	No detectable change	Not logged	Reduced root growth 2.2m-3.5m. New root growth 4.6m-7m. No changes to cavities and voids.		
MEARC4294	No detectable change	Not logged	No detectable change		
MEARC4301	No detectable change	No detectable change	Change in weathered zones. Residual mud cake from the drilling fluid has been dislodged at 21.6m revealing a cavity.		
MEARC4303	No detectable change	No detectable change	No detectable change		
MEARC4318	Dark spot disappeared. No changes to cavities and voids.	No detectable change	No detectable change		
MEARC4475	Not logged	Not logged	No detectable change (compared with 2013 and 2014 data)		

Summary of Mesa A monitoring results

Troglofauna sampling and habitat monitoring indicate that the Mesa A MEZ is functioning as intended. Within the inherent limitations of troglofauna sampling, the results indicate that a troglofauna community with similar abundance and diversity to the pre-mining community continues to be present at Mesa A. Down hole habitat monitoring shows little discernible influence of mining on subterranean temperature and humidity values with variations in temperature and humidity not significantly different from those at reference sites and proximity to the pit face showing no influence on mean temperature or humidity values. Down hole imagery shows no evidence of degradation of troglofauna habitat through collapse of cavities or generation of new fractures due to mining activities.

6.4.3 Potential impacts

6.4.3.1 Direct impacts

Potential direct impacts of the Proposed Change to troglofauna have been identified as:

- Reduction in troglofauna habitat due to mine pit development
- Loss of individuals and changes to assemblages due to mine pit development.

Reduction in troglofauna habitat due to mine pit development

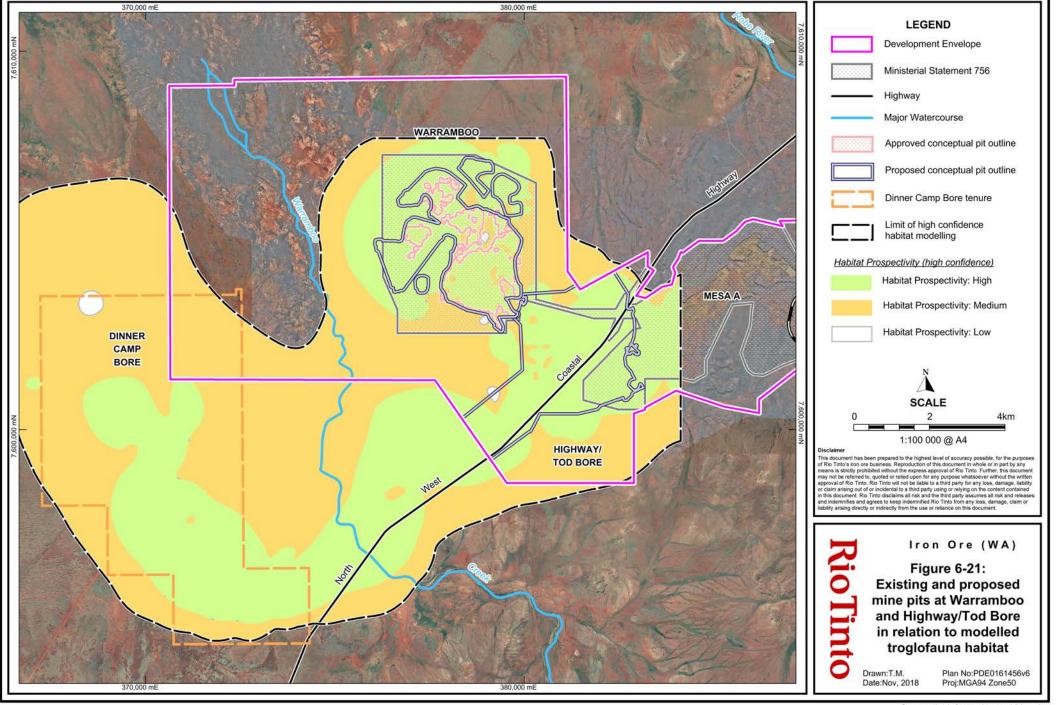
The characteristics of troglofauna habitat and the modelled extent of habitat are described in Section 6.4.1.3.

Warramboo

As discussed in Section 6.4.1.3, high confidence habitat modelling is available in areas with a high density of drill holes. Table 6-13 and Figure 6-21 show the potential troglofauna habitat that will be directly impacted by the proposed mining at Warramboo and Highway/Tod Bore. Assessment of potential impacts of the loss of this troglofauna habitat are provided in Section 6.4.4.1.

Table 6-13: Potential direct impact to troglofauna habitat at Warramboo and Highway/Tod Bore

Habitat prospectivity	Modelled current habitat extent within the limit of high confidence habitat modelling (ha)	Proposed extent of disturbance due to mine pit development			
		Warramboo		Highway/Tod Bore	
		Exte nt (ha)	% of current modelled extent	Extent (ha)	% of current modelled extent
High	6,136	468	8%	1,072	17%
Medium	9,620	59	1%	88	1%
Low	54	5	10%	5	9%



Mesas A, B and C

As discussed in Section 6.4.1.3, a conservative approach, considering only the areas of high prospectivity habitat, has been taken to identify and assess potential impacts to troglofauna habitat at Mesas A, B and C. This conservative approach is based upon three-dimensional modelling data and, therefore, allows an output as a percentage of volume. Through the development of mine pits the Proposed Change will directly impact:

- Up to 2% of the volume of pre-mining troglofauna habitat at Mesa A¹³
- Up to 50% of the volume of pre-mining troglofauna habitat at Mesas B
- Up to 50% of the volume of pre-mining troglofauna habitat at Mesa C.

Loss of individuals and changes to troglofauna assemblages due to mine pit development

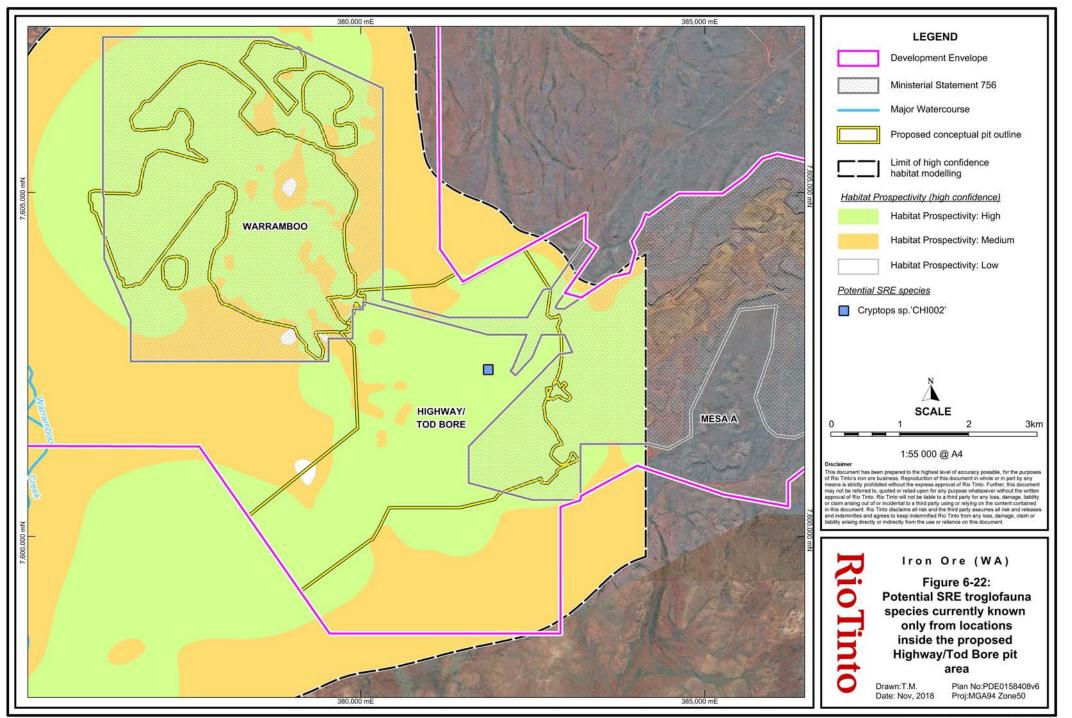
Warramboo

Troglofauna taxa recorded in the survey areas are discussed in Section 6.4.1.4. Nine potential SRE species have been recorded in the Warramboo and Highway/Tod Bore area. One species, *Tyrannochthonius*, sp. 'Warramboo' was recorded in 2005 (Biota 2006c) in an area proposed as a mine pit as part of the Mesa/Warramboo Iron Ore Project. This area was assessed and approved for mining under MS 756. All other troglofauna taxa recorded in proposed impact areas at Warramboo have been recorded elsewhere.

Highway/Tod Bore

One potential SRE species, *Cryptops* sp. 'CHI002', has been recorded only within the proposed Highway/Tod Bore pit area (Figure 6-22).

¹³ Only the volume for the Proposed Change is considered here. The cumulative volume for the approved activities and the Proposed Change is considered in Section 6.4.3.3.



Mesa B and Mesa C

Forty-nine potential or confirmed SRE species have been recorded from Mesas B and C. Ten troglofauna Orders have been recorded from Mesa B of which nine are represented in the proposed MEZ (Table 6-14). Ten troglofauna Orders have also been recorded from Mesa C, of which nine are represented in the proposed MEZ (Table 6-15).

Table 6-14: Troglofauna recorded (Order level) 2005-2016 at Mesa B

	Order recorded		
Order	Mesa B	Mesa B proposed MEZ	
Araneae	✓	✓	
Coleoptera	√	✓	
Diplura	√	✓	
Hemiptera	✓	-	
Isopoda	√	✓	
Polydesmida	√	✓	
Pseudoscorpiones	✓	✓	
Schizomida	✓	✓	
Zygentoma	✓	✓	
Scolopendromorpha	✓	✓	

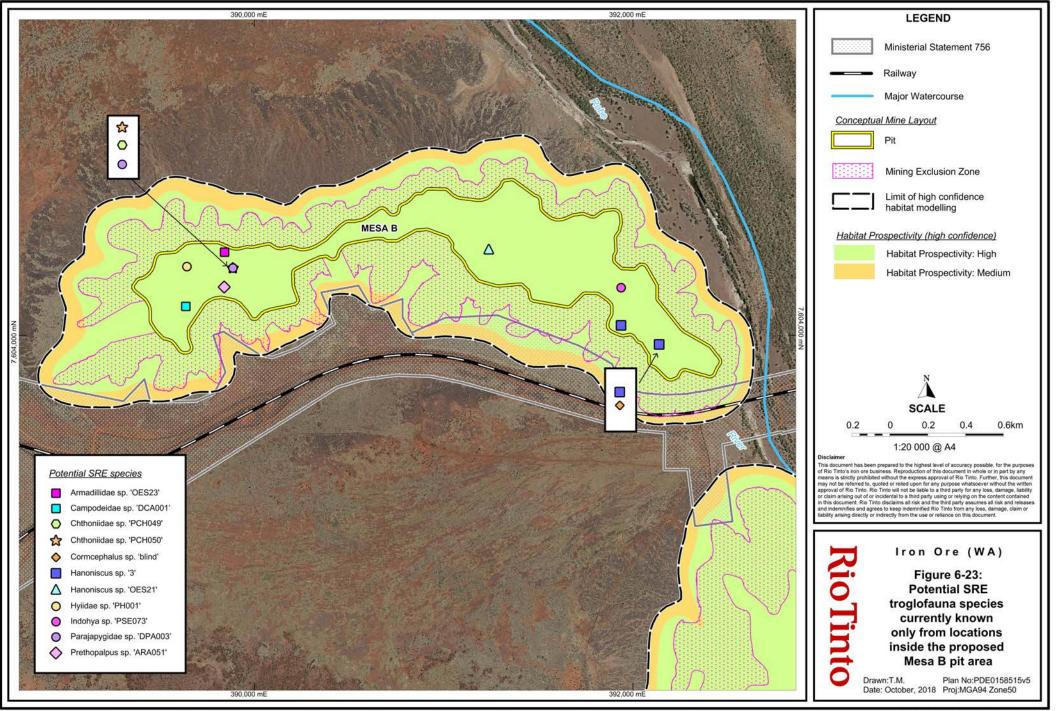
Table 6-15: Troglofauna recorded (Order level) 2005-2016 at Mesa C

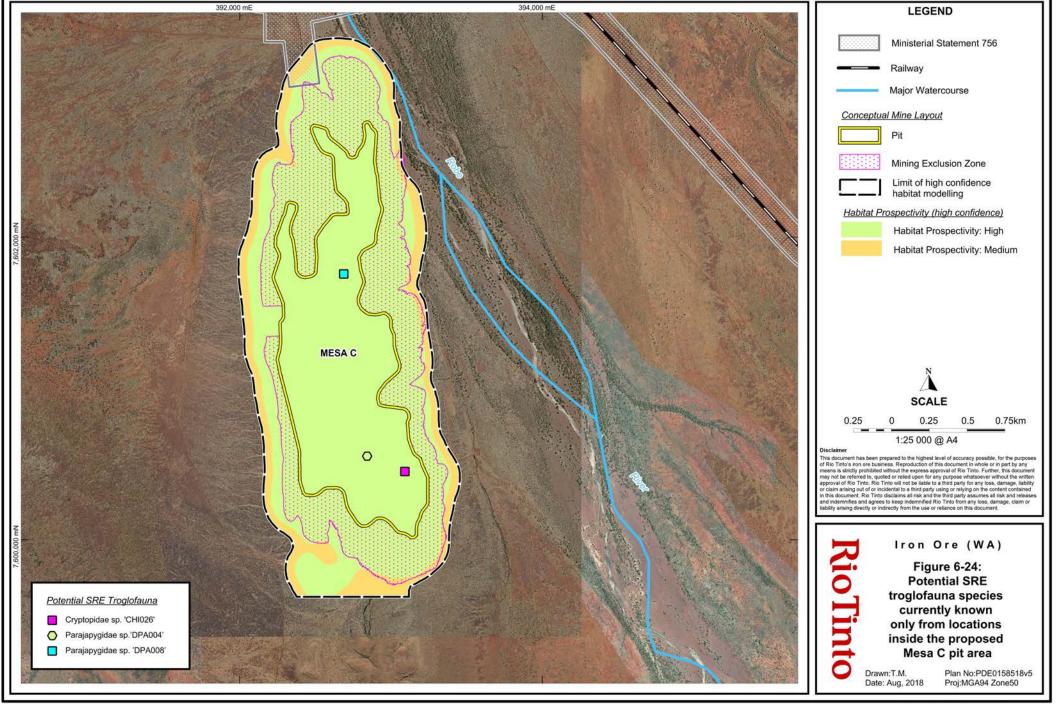
Outer	Order recorded			
Order	Mesa C	Mesa C proposed MEZ		
Araneae	✓	✓		
Coleoptera	✓	✓		
Diplura	✓	✓		
Isopoda	✓	✓		
Opiliones	✓	✓		
Polydesmida	√	✓		
Pseudoscorpiones	✓	✓		
Schizomida	√	✓		
Zygentoma	✓	✓		
Scolopendromorpha	✓	-		

From the above Orders, 11 potential SRE troglofauna species are currently known only from the proposed impact area at Mesa B (Table 6-16, Figure 6-23) and three potential SRE troglofauna species are currently known only from the proposed impact area at Mesa C (Table 6-16, Figure 6-24).

Table 6-16: Potential SRE troglofauna species currently known only from the proposed impact areas at Mesas B and C

Mesa B	Mesa C
Armadillidae sp. 'OES23'	Cryptopidae sp. 'CHI026'
Campodeidae sp. 'DCA001	Parajapygidae sp. 'DPA004'
Chthoniidae sp. 'PCH049'	Parajapygidae sp. 'DPA008'
Chthoniidae sp. 'PCH050'	
Cormcephalus sp. `blind`	
Hanoniscus sp. '3'	
Hanoniscus sp. 'OES21'	
Indohya sp.'PH001'	
Indohya sp. 'PSE073'	
Parajapygidae sp. 'DPA003'	
Prethopalpus sp. 'ARA051'	



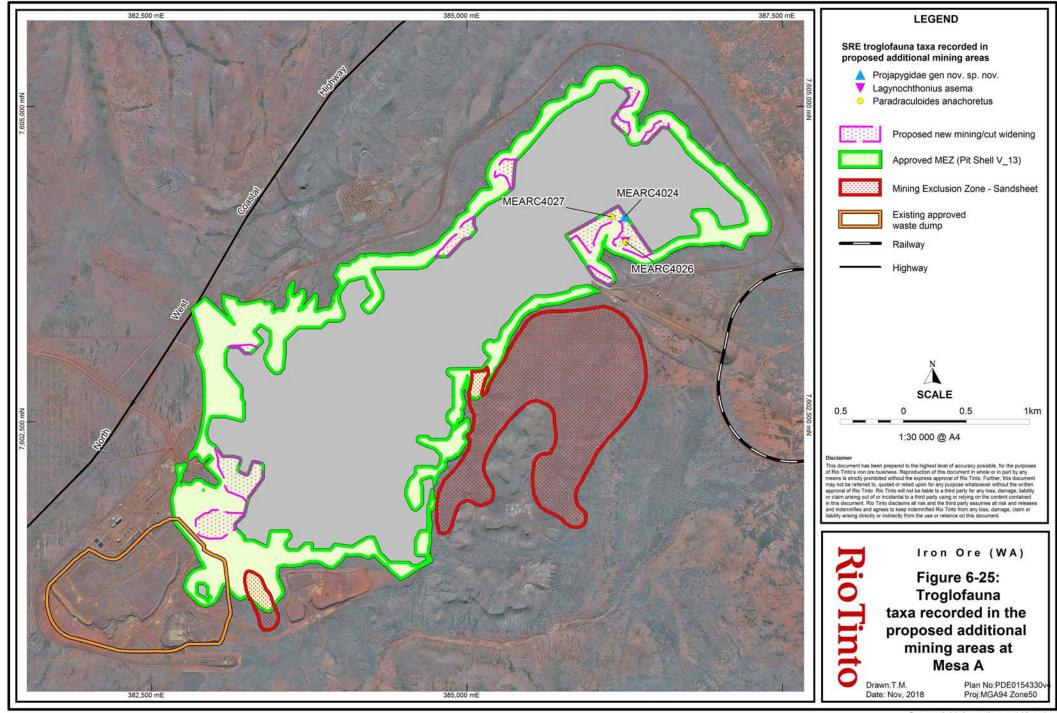


Mesa A

Three SRE troglofauna taxa have been recorded in the proposed additional mining areas at Mesa A as shown in Figure 6-25. All three taxa have also been recorded in the proposed revised Mesa A MEZ (Table 6-17).

Table 6-17: Troglofauna taxa recorded in the proposed additional mining areas at Mesa A

Drill hole	Order	Family	Taxon	Recorded in proposed revised MEZ?
MEARC4024	Diplura	Projapygidae	Genus nov. sp. nov.	Yes
MEARC4026 MEARC4027	Schizomida	Hubbardiidae	Paradraculoides anachoretus	Yes
MEARC4026	Pseudoscorpionida	Cthoniidae	Lagynochthonius asema	Yes



6.4.3.2 Indirect impacts

Potential indirect impacts to troglofauna include temporary loss or degradation of habitat due to mining activities other than mine pit excavation. Mining activities that may result in indirect impacts to troglofauna include:

- Clearing of vegetation and placement of mineral waste potentially leading to a reduction in organic inputs into the subterranean environment. educed organic inputs may diminish the quality of troglofauna habitat
- Seepage from the WFSF will generate a saturated zone above the groundwater table, resulting in a temporary reduction in troglofauna habitat
- Blasting may cause voids and mesocaverns within the remnant mesa formations to collapse, resulting in a reduction in troglofauna habitat
- Exposure of pit faces may cause changes to the temperature and humidity in the subterranean environment, potentially leading to degradation of troglofauna habitat
- Hydrocarbon spills may result in a reduction in the quality of troglofauna habitat.

Considering the high confidence modelling outputs, potential indirect impacts to troglofauna habitat as a result of placement of mineral waste material from the proposed mining at Warramboo and Highway/Tod Bore are shown in Table 6-18. No waste dumps are proposed in high prospectivity habitat (including the proposed MEZs) at Mesas B or C. Therefore, waste dumps for Mesas B and C are not included in Table 6-18.

Table 6-18: Potential indirect impacts to troglofauna habitat in the vicinity of Warramboo from placement of mineral waste

	Modelled	Proposed extent of disturbance due to waste dum			
Habitat	current habitat extent within the limit of high confidence habitat modelling (ha)	Warramboo		Highway/Tod Bore	
prospectivity		Extent (ha)	% of current modelled extent	Extent (ha)	% of current modelled extent
High	6,136	143	2%	81	1%
Medium	9,620	57	1%	160	2%
Low	54	5	9%	0	0%

A significant change in subterranean humidity due to groundwater abstraction is not considered likely. The humidity in the subterranean environment in the Robe Valley is believed to be maintained from a combination of infiltration from rainfall through the porous CID and via fissures and bedding planes; the presence of in-situ moisture content within the CID (including intra clay layers); and the presence of the groundwater table in some areas.

At Mesa A, much of the troglofauna habitat is located at least 20 m above the water table and the retained habitat in the MEZ is not in direct connection with the water table. Numerous troglofauna have been recorded in the MEZ and in areas where troglofauna habitat is located 30 to 40 m above the water table. This indicates that proximity to the water table is not a prerequisite for development and maintenance of suitable troglofauna habitat. As described in section 6.4.2.2, downhole monitoring indicates that mining at

Mesa A has had little discernible influence on down hole temperature and humidity in the Mesa A MEZ (Astron 2017b).

In the western portion of the Development Envelope, only a small volume of troglofauna habitat is in close contact with the water table. Abstraction of groundwater will lower the groundwater table at Warramboo and Mesa C. However, as only a small volume of the troglofauna habitat is currently in close contact with the water table and proximity to the water table has not been demonstrated to be a prerequisite for suitable troglofauna habitat, a significant change in troglofauna habitat due to groundwater abstraction is considered unlikely.

Assessment of the potential indirect impacts to troglofauna and troglofauna habitat is provided in Section 6.4.4.2.

6.4.3.3 Cumulative impacts

The below section presents the incremental impact from the Proposed Change while taking into account previously approved projects. Section 6.4.4.3 discusses the significance of these impacts at each location.

Potential cumulative impacts to troglofauna will occur in the Warramboo and Highway/Tod Bore area as a result of the current and proposed mining operations. Table 6-19 summarises potential cumulative impacts to troglofauna habitat as a result of pit development in the Warramboo and Highway/Tod Bore areas.

Table 6-19: Cumulative impacts to troglofauna habitat as a result of pit development in the Warramboo and Highway/Tod Bore areas

Habitat prospectivity	Modelled premining habitat extent (high confidence) (ha)	Current disturbance (% of pre- mining extent)	Proposed disturbance (% of pre- mining extent)	Total cumulative disturbance (% of premining extent)
High	6,704	8%	23%	31%
Medium	9,675	<1%	2%	2%
Low	54	<1%	19%	19%

The current mine pits at Mesa A have been designed to retain approximately 52% by volume of pre-mining troglofauna habitat¹⁴. The proposed incremental disturbance will be up to 2% by volume of pre-mining troglofauna habitat, resulting in a proposed cumulative impact up to 50% by volume of pre-mining habitat.

Mesas B and C have not previously been approved for mining and the species present are largely isolated to each mesa thus the Proposed Change does not represent part of a cumulative impact to troglofauna communities at Mesas B and C.

¹⁴ Based on current geological and water table data.

Overall cumulative impacts to the two troglofauna PECs in the area are presented in Table 6-20. The calculation for the remaining extent takes into account other foreseeable proposals in the area (Mesa H) as well as existing approved developments (Mesa A and Warramboo).

Table 6-20: Cumulative impacts to troglofauna PECs as a result of pit development at Warramboo, Highway/Tod Bore and Mesas B and C¹⁵

PEC	Original assumed pre-mining extent of PEC (ha)	Current extent after other habitat loss* (% of pre- mining extent)	Extent of proposed disturbance (% of premining extent)	Extent after cumulative disturbance (% of premining extent)
Subterranean invertebrate communities of mesas in the Robe Valley region	13,753	87%	2%	85%
Subterranean invertebrate community of pisolitc hills in the Pilbara	9,890	85%	13%	72%

^{*} Other habitat loss includes impacts that have already occurred or are reasonably foreseeable from other proposed developments

Assessment of the significance of the predicted cumulative impacts to troglofauna and troglofauna habitat is provided in Section 6.4.4.3.

6.4.4 Assessment of impacts

6.4.4.1 Direct impacts

Reduction in troglofauna habitat due to mine pit development

Warramboo

Modelling of troglofauna habitat has been undertaken in and around the Warramboo area to assess the potential impact of mine pit development on troglofauna habitat. Additional mine pit development at Warramboo is largely proposed to be BWT within the previously approved pit footprint thus little additional loss of troglofauna habitat at Warramboo due to mine pit development is proposed. It is estimated that the proposed mine pit development at Warramboo will result in the removal of approximately:

- 468 ha of modelled high prospectivity habitat, representing approximately 8% of the current high prospectivity habitat within the limit of high confidence modelling
- 59 ha of modelled medium prospectivity habitat, representing approximately 1% of the current medium prospectivity habitat within the limit of high confidence modelling.

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¹⁵ Overlaps in mapped PEC extents within the Development Envelope have been ignored.

Based on the habitat model, both high and medium prospectivity habitat at Warramboo extend into areas to the west and north of the proposed pits, including areas outside the western portion of the Development Envelope (Figure 6-21). Given the relatively small proportion of habitat that will be removed by the proposed additional mining at Warramboo and that modelled high and medium prospectivity habitat extend beyond the approved and proposed mine pit areas, the Proposed Change is unlikely to significantly affect the ecological integrity of the troglofauna habitat in the Warramboo area.

Highway/Tod Bore

Modelling of troglofauna habitat has been undertaken in and around the Highway/Tod Bore area to assess the potential impact of mine pit development on troglofauna habitat. Mine pit design for the Highway/Tod Bore area is preliminary and opportunities to reduce the area required will be explored as mine planning progresses. Based on outputs from the habitat model and the current pit outline, high prospectivity habitat will remain around the Highway/Tod Bore area and medium prospectivity habitat will provide connectivity between Warramboo, Highway/Tod Bore and beyond the western portion of the Development Envelope (Figure 6-21). The proposed mine pit development at Highway/Tod Bore will result in the removal of up to:

- 1,072 ha of modelled high prospectivity habitat, representing approximately 17% of the current high prospectivity habitat within the limit of high confidence modelling
- 88 ha of modelled medium prospectivity habitat, representing approximately 1% of the current medium prospectivity habitat within the limit of high confidence modelling.

Drilling data and CID thickness modelling do not indicate any faults or other structural features in the Highway/Tod Bore area that may indicate a discontinuity in habitat. However, limited sampling from the Dinner Camp Bore area south-west of Highway/Tod Bore on the western extent of the high prospectivity habitat mapping (Figure 6-21) did not record representatives of the strongly troglobitic order, Schizomida, which is represented in the broader Warramboo and Highway/Tod Bore area. The majority of sampling in the Dinner Camp Bore area was completed in a stand-alone survey in 2010; no simultaneous sampling was conducted at Warramboo or Highway/Todd Bore. The lack of schizomid records at Dinner Camp Bore may be due to ecological sampling effects, particularly different sampling methodologies and rainfall during and prior to survey. As a consequence, the results from Dinner Camp Bore may not be directly comparable with those at Highway/Todd Bore and Warramboo (Biota 2017a), or may indicate a discontinuity in troglofauna habitat outside the Development Envelope. Additional troglofauna sampling is underway to further investigate habitat connectivity between the Highway/Tod Bore and Dinner Camp Bore areas; further sampling will continue as per EMP management targets.

Given the extent of modelled high and medium prospectivity habitat that will remain around the Highway/Tod Bore area during and after the proposed mining operation, it is likely that further sampling and investigation will demonstrate that the Proposed Change can be managed to retain the ecological integrity of the troglofauna habitat at Highway/Tod Bore.

Mesa B and Mesa C

The Proposed Change has been designed to retain significant volumes of connected troglofauna habitat at Mesas B and C as delineated by a MEZ. Monitoring results from the existing nearby, and geologically similar, Mesa A mining operation have been used to guide the design of the MEZs at Mesas B and C and assess the likely suitability of those designs.

The statistical power of troglofauna sampling is limited by the sampling methodology. Within the limitations presented by current troglofauna sampling methodology, the abundance and diversity of troglofauna recorded from the MEZ behind the escarpment at Mesa A during mining appear to be similar to those recorded across Mesa A prior to commencement of mining (Section 6.4.2.2). Monitoring of down hole temperature and humidity in the retained troglofauna habitat at Mesa A has shown no influence of proximity to the pit face on mean down hole temperature and humidity and variations in temperature and humidity values at Mesa A were not significantly different from those at Mesa B and Mesa K (Astron 2017b). The Proponent, therefore, considers that the Mesa A MEZ is functioning as intended and is providing habitat to maintain the biological diversity and ecological integrity of the subterranean fauna community.

Comparison of sampling results from the Mesa A MEZ with preliminary sampling results from disturbed habitat in waste dumps and beneath the pit floor at Mesas A and K provides greater certainty of persistence of troglofauna in the retained habitat in the MEZ than beneath the pit floor. Based on the performance of the Mesa A MEZ, MEZs have been included in the mine design for Mesas B and C with a focus on retaining connected habitat behind the mesa escarpments, rather than beneath the pit floors.

Although there is some indication, as discussed in Section 6.4.1.3, that there is, or has been in recent geological time, some habitat connectivity between Mesas B and C, the Proponent has taken a precautionary approach and has assumed that the habitat on Mesas B and C is isolated from the surrounding medium prospectivity habitat. In order to retain suitable habitat, and based on experience at Mesa A, MEZs are proposed on Mesas B and C that consist only of modelled high prospectivity habitat.

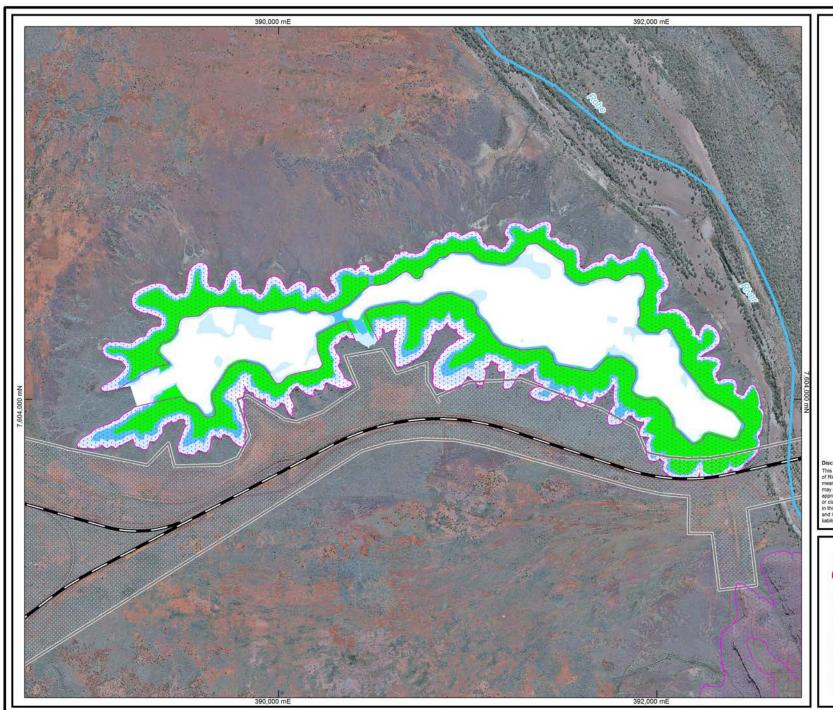
Troglofauna capture rates vary markedly between sampling events. Table 6-21 shows minimum, maximum and overall capture rates at Mesas B and C and in the areas proposed as MEZs at Mesas B and C. The range of capture rates and overall capture rate for each proposed MEZ are similar to the rates for the entire mesa. The similar capture rate for each MEZ compared with the entire respective mesa indicates that the proposed MEZs are representative of the mesa in terms of overall troglofauna utilisation.

Table 6-21: Troglofauna capture rates at Mesas B and C

Location	Capture rate (specimens per 100 holes trapped)			
Location	Minimum rate	Maximum rate	Overall rate	
Mesa B	17	427	155	
Mesa B proposed MEZ*	164	200	178	
Mesa C*	22	133	72	
Mesa C proposed MEZ*	33	147	85	

^{*} Surveys with <6 holes excluded from capture rate calculations.

Figure 6-26 and Figure 6-27 show the thickness of material suitable as troglofauna habitat that is proposed for retention at Mesas B and C (backfill of waste material is not shown in these figures). The MEZ has been designed as far as possible to be a continuous block of habitat greater than 15 m thick with retention of at least 50% by volume of the pre-mining habitat at each mesa. The thickness of habitat is less than 15 m in some parts of the MEZ; this occurs where the pre-mining habitat thickness is naturally less than 15 m.



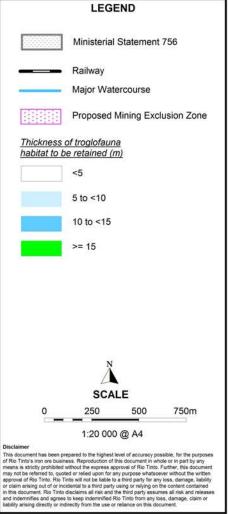
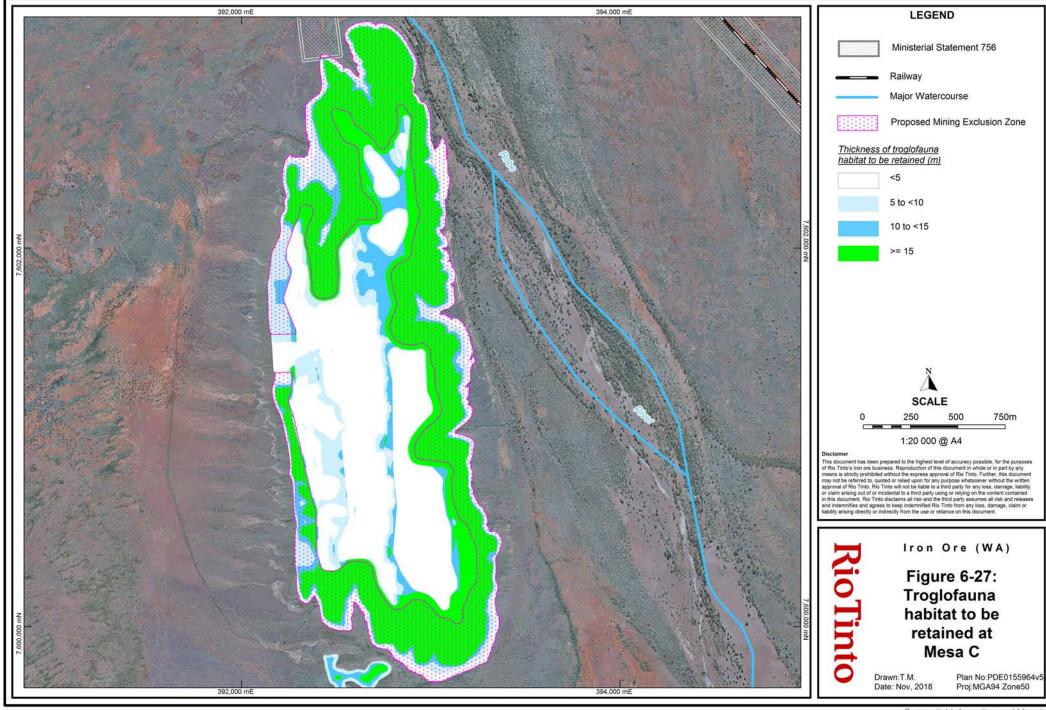


Figure 6-26:

Figure 6-26: Troglofauna habitat to be retained at Mesa B

Drawn:T.M. Date:Nov, 2018 Plan No:PDE0155964v5 Proj:MGA94 Zone50



Retained habitat will be at least 15 m thick (except in areas where the pre-mining habitat thickness is less than 15 m), with a width of at least 50 m on the mesa plateau. The width of retained habitat at the base of the mesa will be significantly greater than 50m due to the natural slopes of the mesa escarpment and due to the formation of benches during mining (rather than a sheer face from the top to the bottom of the pit). Considering troglofauna typically have dimensions in the order of a few millimetres, the Proponent considers that the dimensions of the proposed habitat to be retained are suitable to retain the ecological integrity of the troglofauna habitat.

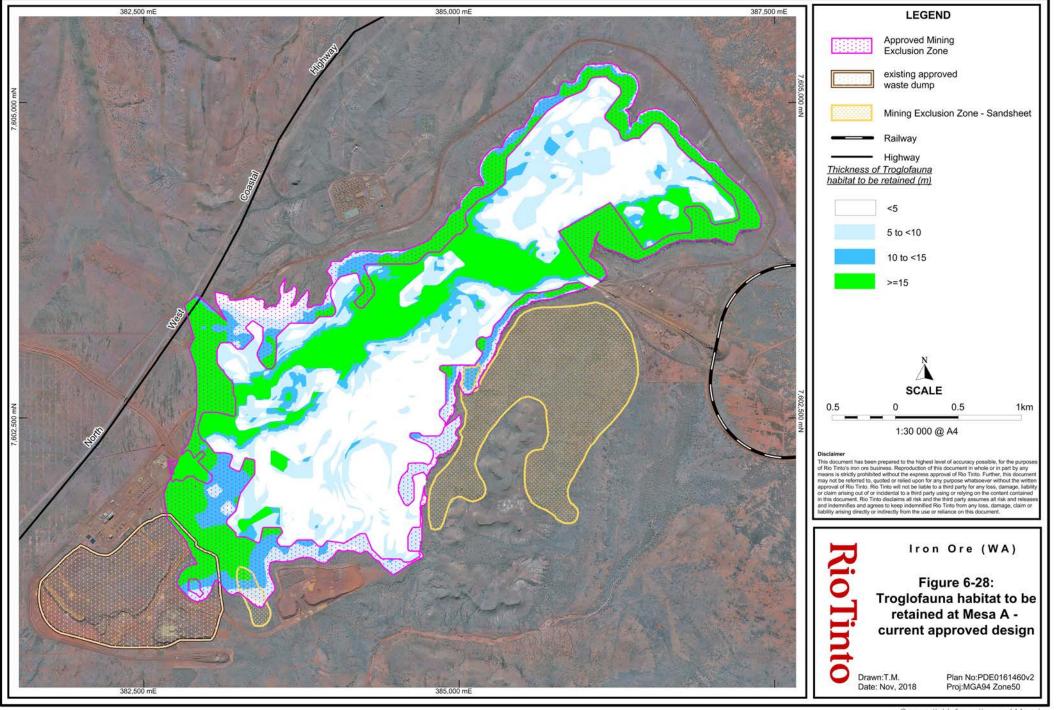
Given that a) the Mesa A MEZ is providing suitable habitat, as evidenced by subterranean temperature and humidity monitoring and troglofauna sampling results; and b) the proposed MEZ designs for Mesas B and C are similar to the Mesa A MEZ and are likely to be representative of the troglofauna habitat throughout both mesas, it is considered that the Proposed Change will retain the ecological integrity of the troglofauna habitat at Mesas B and C.

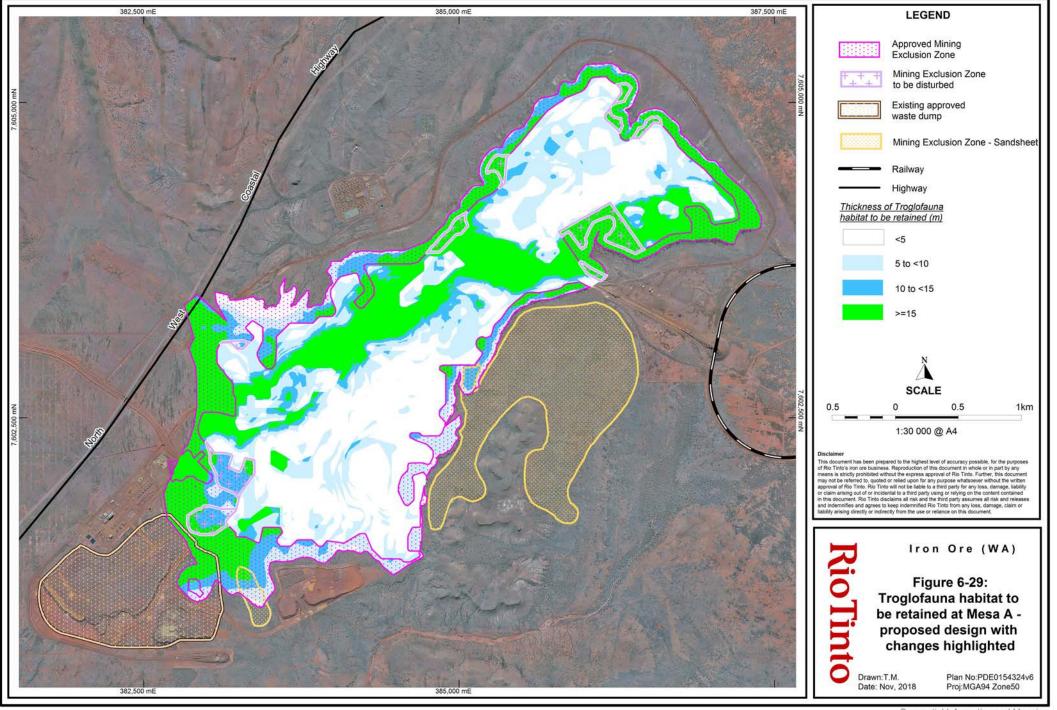
Mesa A

The Proponent proposes to revise the Mesa A MEZ. The proposed disturbance will be limited to 42 ha which includes preferential mining of higher quality ore (33 ha), widening of the existing escarpment cut (2 ha) and essential associated additional light vehicle access roads and other minor clearing in the Mesa A MEZ (7 ha).

In order to achieve minimal impact to the MEZ, several options were examined for extraction of additional ore from Mesa A. The initial option considered was extraction of all high grade and low grade ore from beneath the currently approved pit floor. This option was not pursued as the Proponent considered it would have resulted in unacceptable impacts to remnant troglofauna habitat beneath the pit floor. Subsequent options considered possible revisions to the MEZ behind the Mesa A escarpment. Options were revised to exclude the catchments for the Sand Sheet PEC and singleton troglofauna (troglofauna known from a single specimen) from the proposed mining area. The proposed option was selected on the basis that it will not impact the catchment for the Sand Sheet PEC, will not impact any singleton troglofauna records and will have the lowest impact on troglofauna habitat of the options considered while optimising the extraction of high grade ore.

The proposed changes to the MEZ at Mesa A are small compared with the existing development at Mesa A. Figure 6-28 and Figure 6-29 show the proposed changes to the thickness of retained habitat. The Proposed Change will continue to retain at least 50% by volume of connected pre-mining habitat at Mesa A, with connected habitat thickness beneath the pit floor of greater than 15 m.





Given that the Mesa A MEZ is providing suitable habitat, as evidenced by subterranean temperature and humidity monitoring and troglofauna sampling results, and that the proposed changes to the Mesa A MEZ are minor, it is considered that the Proposed Change will continue to retain the ecological integrity of the troglofauna habitat at Mesa A.

Loss of individuals and changes to troglofauna assemblages due to mine pit development

Excavation associated with mine pit development will result in the direct loss of individuals and has the potential to change troglofauna assemblages. Proposal design followed an iterative process and considered troglofauna records, available habitat and likely connectivity of habitat. Potential impacts of the Proposed Change on each recorded troglofauna taxon were assessed, regardless of whether the taxon had previously been categorised as confirmed SRE, potential SRE or widespread in biological survey reports (Rio Tinto 2018a).

Warramboo

Additional mine pit development at Warramboo is largely proposed to be BWT within the previously approved pit footprint thus little additional loss of troglofauna habitat at Warramboo due to mine pit development is proposed. As noted in Section 6.4.3.1, other than the record of *Tyrannochthonius*, sp. 'Warramboo' which was assessed and approved for disturbance as part of the Mesa A/Warramboo Iron Ore Project, all troglofauna taxa recorded in proposed impact areas at Warramboo have been recorded elsewhere. It is, therefore, considered that the Proposed Change is unlikely to significantly impact the diversity and ecological integrity of the troglofauna assemblage at Warramboo.

Highway/Tod Bore

One potential SRE species, Cryptops sp. 'CHI002', has been recorded only within the proposed Highway/Tod Bore pit area as shown in Figure 6-22. This record is currently a singleton record and represents a potential SRE species. However, this singleton records is unlikely to represent the true distribution of this species and is likely an artefact of sampling effects (Biota 2017a). High and medium prospectivity habitat will continue to be available in the immediate Highway/Tod Bore area within the Development Envelope beyond the proposed impact area. Habitat analysis at Highway/Tod Bore indicates that high, medium and low prospectivity habitat also extends beyond the western portion of the Development Envelope into the wider surrounding region. Drilling data and CID thickness modelling do not indicate any faults or other structural features in the Highway/Tod Bore area that may indicate a discontinuity in habitat. However, limited sampling from the Dinner Camp Bore area south-west of Highway/Tod Bore on the western extent of the high prospectivity habitat mapping outside the western portion of the Development Envelope (Figure 6-21) did not record representatives of the strongly troglobitic order, Schizomida. The lack of schizomid records at Dinner Camp Bore may be due to ecological sampling effects or may indicate a discontinuity in troglofauna habitat outside the Development Envelope (Biota 2017a). Additional troglofauna sampling is underway to further investigate habitat connectivity between the Highway/Tod Bore and Dinner Camp Bore areas.

Given that high and medium prospectivity habitat will continue to be available both within and beyond the western portion of the Development Envelope and that *Cryptops* sp. 'CHI002' is likely to have a wider distribution that extends beyond the proposed impact area, it is likely that further sampling and investigation will demonstrate that the Proposed Change can be managed to retain the ecological integrity of the troglofauna habitat at Highway/Tod Bore.

Mesa B / Mesa C

Although significant, connected troglofauna habitat is to be retained at Mesas B and C, the Proponent has taken a precautionary approach in relation to single location and singleton troglofauna records. The original draft MEZs have been modified several times during mine planning in order to avoid as many single location and singleton troglofauna as practicable. Consistent with Mesa A, revisions of the MEZs aimed to include at least one location in the MEZs for each taxon wherever practicable. This strategy appears to have been effective at Mesa A, with some troglofauna (for example *Lagynochthonius asema* and *Ideoblothrus* sp. 'Mesa A1') originally considered to be at risk but now known from additional locations in the Mesa A MEZ (6.4.2.2). The revisions of the MEZs have resulted in all Orders, except one at Mesa B and one at Mesa C, being represented in the MEZs (Table 6-14, Table 6-15).

Forty-nine conservation significant, confirmed SRE and potential SRE species have been recorded from Mesas B and C of which 27 are known from outside the proposed impact area. Eleven potential SRE troglofauna species at Mesa B are currently known only from locations inside the proposed impact area (Table 6-16) and three potential SRE troglofauna species at Mesa C are currently known only from locations inside the proposed impact area (Table 6-16).

The EPA acknowledges that habitat may be used as a surrogate for inferring distributional boundaries of potentially restricted taxa (EPA 2016g and 2016h). Where a habitat type that supports a species is continuous then the extent of that habitat may be used to infer the likely presence of that species in the same habitat. Figure 6-4 to Figure 6-8 in Section 6.4.1.3 show that Robe Pisolite is present across the entirety of each mesa formation and there are no known geological barriers or faults within Mesas B and C that may restrict troglofauna movement.

The EPA also notes that taxa with greater known distributions may act as surrogates to infer the distributions of poorly sampled species (EPA 2016h). *Paradraculoides bythius*, a conservation significant species listed as Threatened – Vulnerable, has been recorded across the full extent of Mesa B and almost across the full extent of Mesa C (Figure 6-30). Records of the same species from multiple locations indicates that the troglofauna habitat within each mesa is well connected (Figure 6-30).

The occurrence of some taxa from multiple locations within Mesa B and within Mesa C and the absence of known geological barriers and faults from both mesas indicate that the troglofauna habitat within each mesa is well connected. It is, therefore, considered that the troglofauna species currently only recorded from inside the proposed impact area, are likely to have distributions that extend beyond the proposed impact area into the proposed MEZ.

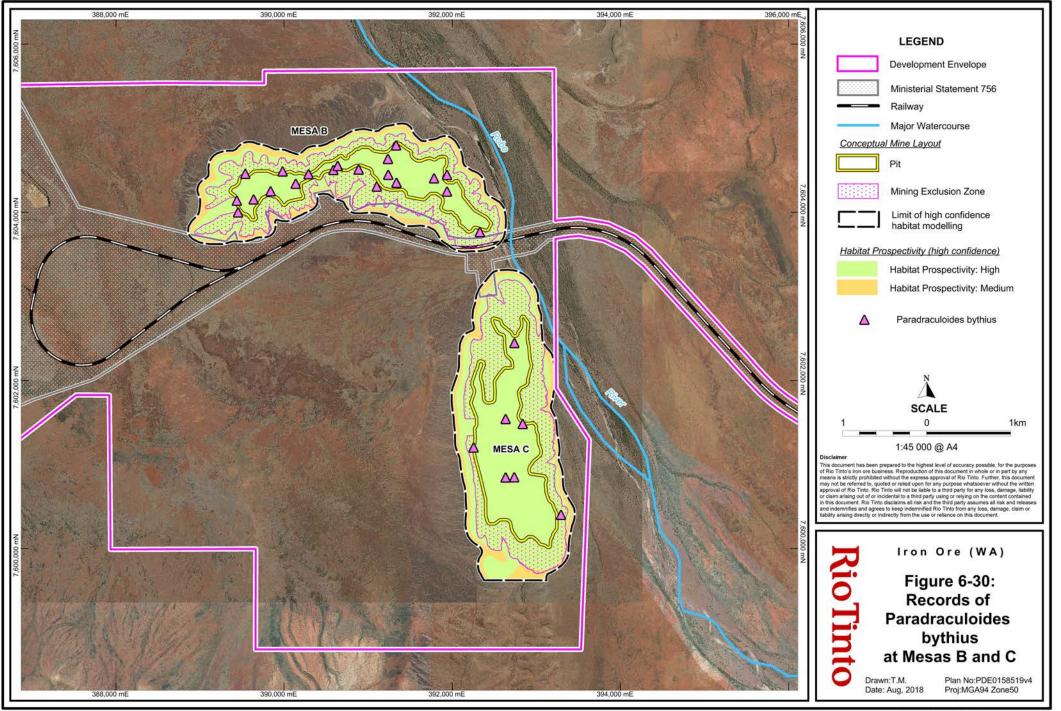
Additional troglofauna sampling will be undertaken with the aim of increasing the recorded occurrences of current single location and singleton troglofauna taxa. Should additional sampling show broader distributions for current single location and singleton taxa around which the MEZs have been designed, the Proponent may seek additional approval to modify the MEZs.

Given the evidence indicating connectivity of the habitat within Mesas B and C, the proposed retention of at least 50% by volume of connected pre-mining habitat at both Mesas B and C and that the MEZs have been designed to incorporate areas with singleton records as far as practicable, it is considered likely that the species recorded only from the proposed impact areas at Mesas B and C have wider distributions that extend beyond the proposed impact area. It is, therefore, considered that the Proposed Change can be managed such that the diversity and ecological integrity of the troglofauna assemblages at Mesas B and C are maintained.

Mesa A

Three SRE troglofauna taxa have been recorded in the proposed additional mining areas at Mesa A as shown in Figure 6-25. All three taxa have been recorded in the proposed revised Mesa A MEZ (Table 6-17).

Given that at least 50% by volume of connected pre-mining habitat will be retained at Mesa A and all documented troglofauna in the proposed additional mining area at Mesa A have been recorded in the revised MEZ, it is considered that the Proposed Change can be managed such that the diversity and ecological integrity of the troglofauna assemblage at Mesa A are maintained.



6.4.4.2 Indirect impacts

Mining-related activities such as clearing of vegetation and placement of mineral waste, disposal of waste fines and reverse osmosis plant effluent, blasting exposure of pit faces and hydrocarbon spills may result in temporary loss or degradation of troglofauna habitat.

Clearing of vegetation

Little is known about the origin of energy (i.e. organic carbon), key taxa or connectivity within the food web of subterranean systems. Organic carbon may originate from surface nutrients and once in the subterranean environment may be transferred cyclically through the system from microbial biofilms, to grazers, to predators. Alternatively, energy may be generated in the subterranean system via chemo-autotrophic processes, where bacteria use alternative metabolic pathways to provide energy inputs (Office of the EPA 2012).

If energy in the subterranean system originates from the surface, clearing of vegetation and placement of mineral waste material may lead to a reduction in organic inputs into the subterranean environment, potentially resulting in a reduction in the quality of troglofauna habitat.

The Proposed Change has been designed to minimise clearing through placement of the WFSF in-pit at Warramboo and placement of mineral waste in mined-out pits wherever practicable. The Proposed Change involves clearing of approximately 143 ha and 57 ha at Warramboo of high and medium prospectivity habitat respectively for placement of mineral waste, representing approximately 2% and 1% of the modelled current extent of high and medium habitat prospectivity respectively within the limit of high confidence modelling. The Proposed Change also involves clearing at Highway/Tod Bore of approximately 81 ha and 160 ha of high and medium prospectivity habitat respectively for placement of mineral waste, representing approximately 1% and 2% of the modelled extent of pre-mining high and medium habitat prospectivity respectively. Waste dump design for the Highway/Tod Bore area is preliminary and opportunities to reduce the area required will be explored as mine planning progresses. Disturbed areas will be rehabilitated once they are no longer required by the Proposed Change.

Results from troglofauna sampling in disturbed habitats (Section 6.4.2.2) indicate that troglofauna utilise habitat in or below mineral waste dumps. It is, therefore, likely that troglofauna will utilise habitat in or below the proposed waste dumps at Warramboo and Highway/Tod Bore, although the extent of likely utilisation is not yet known. Studies of troglofauna utilisation of disturbed habitats are ongoing.

Based on outputs from the habitat model and the waste dump outlines, undisturbed high and medium prospectivity habitat will remain around both the Warramboo and Highway/Tod Bore areas, including beyond the western portion of the Development Envelope (Figure 6-21).

Given that disturbance will be minimised outside mining areas, undisturbed habitat will remain around the Warramboo and Highway/Tod Bore areas and rehabilitation will be undertaken, impacts from loss of vegetation are likely to be localised and temporary and are, therefore, unlikely to significantly degrade troglofauna habitat in the Warramboo and Highway/Tod Bore areas.

The Proposed Change has also been designed to limit new clearing in areas designated as MEZs on Mesas A, B and C to infrastructure such as tracks, utilities, telecommunications, monitoring stations and abandonment bunds; such infrastructure is variously required to access troglofauna monitoring sites, meet legal obligations and

because of lack of alternative suitable locations. Proposed mineral waste dumps at Mesas B and C will be located either in-pit or off the mesa in order to minimise clearing in the MEZ. Disturbed areas will be rehabilitated once they are no longer required by the Proposed Change.

Given that disturbance will be minimised outside mining areas and rehabilitation will be undertaken, impacts from loss of vegetation are likely to be localised and temporary and are, therefore, unlikely to significantly degrade troglofauna habitat.

Waste fines storage

In-pit storage of waste fines (from the entire Proposal) and disposal of effluent from the reverse osmosis plant is proposed at Warramboo. Seepage will generate a saturated zone below the WFSF and above the groundwater table thus reducing troglofauna habitat for the duration of seepage. Partial excavation of this habitat has already occurred from the existing mining operation at Warramboo.

Given the temporary nature of the seepage from the WFSF, in-pit storage of waste fines at Warramboo is unlikely to affect the long-term ecological integrity of the troglofauna habitat in the Warramboo area. High and medium suitability troglofauna habitat will continue to be available around the Warramboo area for the duration of seepage (Figure 6-21).

Blasting activities and vibration

Blasting activities and vibration have the potential to degrade troglofauna habitat by causing voids and mesocaverns within the remnant mesa formations to collapse. Optical image surveys conducted periodically in drill holes at Mesas A, B and K since 2009 show no evidence of degradation of troglofauna habitat from collapse of cavities within the remnant mesa formations from as close as 5m to the pit face (Section 6.4.2.2). Significant degradation of troglofauna habitat in proposed MEZs surrounding proposed pit areas is, therefore, considered unlikely.

Exposure of pit faces

Exposure of pit faces to surface climate may cause changes in the temperature and humidity in the subterranean environment and thereby degrade troglofauna habitat.

Subterranean temperature and relative humidity data are collected continuously from uncased drill holes in the MEZ at Mesa A, at Mesa B and in the areas remaining at Mesa K following historical mining. As discussed in Section 6.4.1.2, statistical analysis of down hole temperature and humidity data showed mining at Mesa A has had little discernible influence on the subterranean temperature and humidity in the Mesa A MEZ (Astron 2017b). These results indicate that the proposed exposure of pit faces at Mesas B and C and minor additional exposure at Mesa A is unlikely to significantly degrade troglofauna habitat in the proposed MEZs.

Hydrocarbon spills

The potential exists for the subterranean environment to be degraded by spills of hydrocarbons. Hydrocarbon storage will be situated off the MEZs and will meet relevant Australian Standards. Hydrocarbon storage will be at ground level below the level of the mesa formation thus reducing the risk of contamination within the retained troglofauna habitat. Servicing and re-fuelling of plant and vehicles will not occur within the MEZs,

although re-fuelling of some vehicles will occur in-pit in unsealed areas. Continued implementation of hydrocarbon and spill management procedures will mitigate the risk of hydrocarbon contamination such that hydrocarbon spills are unlikely to significantly degrade troglofauna habitat.

6.4.4.3 Cumulative impacts

Molecular evidence for some troglobitic orders indicates that there is unlikely to be continuous gene flow between the mesas of the Robe Valley. The cumulative impact to troglofauna in mesa environments, therefore, consists of the separate impacts at each mesa.

Up to 50% of the pre-mining habitat volume at Mesas A, B and C will be removed by the proposed mining operation. At Mesa A, this is the total impact, inclusive of the currently approved impact and the proposed additional impact. Given the retention of a significant volume of habitat and that the Mesa A MEZ is functioning as intended (Section 6.4.2.2), it is considered that the proposed changes to the MEZ at Mesa A are small and the ecological integrity of troglofauna habitat in the Mesa A MEZ will be retained.

The current approved mining operation in the Warramboo area will result in removal of approximately 8% of modelled pre-mining high prospectivity habitat and less than 1% of medium prospectivity pre-mining habitat as a result of mine pit development. Proposed pit development at Warramboo and Highway/Tod Bore will result in removal of an additional 23% of the pre-mining extent of high prospectivity habitat and approximately 2% of the extent of medium prospectivity habitat, resulting in a cumulative impact to approximately 31% of the extent of pre-mining high prospectivity habitat and 2% of the extent of pre-mining medium prospectivity habitat within the limit of high confidence modelling (Table 6-19). Given the availability of modelled high and medium prospectivity habitat that occurs outside the proposed Development Envelope, it is considered that the Proposed Change can be managed to retain the ecological integrity of troglofauna habitat around the broader Warramboo and Highway/Tod Bore areas.

Two Priority 1 PECs relevant to troglofauna are present in the western portion of the Development Envelope and across parts of the Robe Valley. The extent of the Subterranean invertebrate communities of mesas in the Robe Valley region PEC after loss from existing mining operations and foreseeable losses is 87% of the pre-mining extent. The Proposed Change will result in an estimated loss of a further 2%, resulting in 85% of the pre-mining extent of the PEC remaining once all cumulative losses have been considered (Table 6-20). The extent of the Subterranean invertebrate community of pisolitic hills in the Pilbara PEC after loss from existing mining operations and foreseeable losses is 85% of the pre-mining extent. The Proposed Change will result in an estimated loss of a further 13%, resulting in 72% of the pre-mining extent of the PEC remaining once all cumulative losses have been considered (Table 6-20). Although a relatively high proportion of the PECs (85% and 72% of pre-mining extent) will remain once all cumulative losses are considered, the Proponent considers that the residual impact associated with the unavoidable clearing of the Priority 1 PECs, is significant and warrants an offset. The proposed offset is discussed in Section 13.

The nearest existing mining operation is the Mesa J Iron Ore mine located approximately 40 km east of the Development Envelope. The nearest proposed mining operations are the API Management West Pilbara Iron Ore Project located approximately 35 km southeast of the Development Envelope and the Mesa H Proposal located approximately 40 km east of the Development Envelope. Troglofauna assemblages in areas near these

existing and proposed operations differ from those in the western portion of the Development Envelope. These operations are, therefore, unlikely to contribute to cumulative impacts on the troglofauna assemblage in the Mesa A Hub Development Envelope.

6.4.5 Closure

The Mesa A Hub Closure Plan (Rio Tinto 2017b) (refer Appendix 3) represents the updated closure plan for the Mesa A, B, C, Warramboo, Highway/Tod Bore operations and supersedes previous closure plans for the approved project. A summary of the approach to closure in the Proposed Change and how it relates to the Subterranean Fauna environmental factor is provided below.

6.4.5.1 Mining Exclusion Zones (MEZ)

A MEZ was established as part of the Mesa A/Warramboo Iron Ore Project to retain troglofauna habitat both during and post-mining operations. Troglofauna sampling and habitat monitoring have shown that the MEZ at Mesa A appears to be providing suitable troglofauna habitat for the continued persistence of a troglofauna assemblage (Bennelongia 2017, Biota 2010b and 2012b, MWH 2014). Similar MEZs are, therefore, proposed for Mesas B and C. The Proposed Change has been designed to limit new clearing in areas designated as MEZs on Mesas A, B and C. Disturbed areas will be rehabilitated once they are no longer required by the Proposed Change, although it is anticipated that minimal rehabilitation works will be required in the MEZs as disturbance will be minimised.

The habitat contained in the MEZs at Mesas A, B and C will be retained throughout the mining operation and upon closure.

6.4.5.2 Retention of troglobitic fauna habitat under the pit floor

At Mesa A, intact troglofauna habitat has been retained under the mine pit in addition to the MEZ. This habitat contains a block of material that is at least 15 m thick and is connected with the MEZ. As current sampling results provide greater certainty of persistence of troglofauna in the retained habitat behind the escarpment at Mesa A than under the pit floor, the design of the MEZs at Mesas B and C has focussed on retention of habitat behind the escarpments. The proportion of pre-mining habitat to be retained behind the mesa escarpments at Mesas B and C is similar to the total proportion of pre-mining habitat retained at Mesa A behind the mesa escarpments and beneath the pit floor.

6.4.5.3 Placement of waste rock

The closure objectives include a final landform that is stable and considers ecological values. To preserve habitat post closure, the integrity of the mesa escarpment needs to be maintained. Several small areas of escarpment at Mesa A are connected by narrow areas of the MEZ which protrude into the pit. Pits will be backfilled against these narrow areas ('fingers' of MEZ) to ensure landform stability and potential connectivity of troglofauna habitat in the long-term (Rio Tinto 2017b). Backfilling of the Mesa B and C pits will be undertaken where mine scheduling allows. No narrow areas ('fingers') of MEZ are currently planned to protrude into the pit at Mesas B and C; should narrow areas of MEZ be required, a similar backfill strategy would be implemented as that at Mesa A.

The Proponent is currently undertaking further investigations into the re-colonisation of inpit waste dumps/low grade stockpiles by subterranean fauna. Early results from Mesa A

and Mesa K indicate troglofauna utilisation of disturbed habitats (Section 6.4.1.2). However, given only limited sampling has been completed to date in disturbed habitats; further work is required to evaluate the diversity of troglofauna present in disturbed habitats and the utilisation of those habitats by troglofauna.

6.4.6 Mitigation

6.4.6.1 Application of the mitigation hierarchy

Mitigation strategies to address the potential impacts and predicted outcomes are presented in Table 6-22.

The Mesa A Hub EMP (Appendix 4) addresses the key environmental factors which were determined by the EPA as being relevant to the appropriate management of dewatering, surface water discharge, conservation significant vegetation communities and fauna species associated with the Mesa A Hub. The EMP identifies:

- Mitigation strategies proposed to minimise impacts to significant environmental values
- The environmental criteria that the Proponent will use to monitor performance of the mitigation strategies to ensure environmental objectives are met
- Trigger criteria, threshold criteria, trigger level actions and threshold contingency actions aligned with the overall management approach
- The management actions that will be implemented in response to monitoring results.

Table 6-22: Mitigation strategies and predicted outcomes for Subterranean Fauna

Potential impacts	Mitigation to address potential impacts	Predicted outcome
Potential impacts EPA objective: To protect subterranean fauna so that biological diversity and Direct impact: reduction in troglofauna habitat due to mine pit development Excavation for the Proposed Change will remove up to: • 468 ha of modelled high prospectivity troglofauna habitat at Warramboo (8% of current modelled high prospectivity habitat)	Mitigation to address potential impacts d ecological integrity are maintained. The following key management strategies will be implemented to manage impacts to troglofauna as a result of mine pit development: Minimise: The mine plan has been designed to retain at least 50% by volume of connected pre-mining troglofauna habitat at Mesas A, B and C by delineation of a MEZ (and pit floor in the case of Mesa A). The Proponent proposes that mine pit development be subject to a new Ministerial Statement for the Revised	Warramboo It is estimated that the proposed additional pit development at Warramboo will result in loss of 8% and 1% of high and medium prospectivity habitat respectively in the limit of high confidence modelling. Given the relatively small proportion of habitat that will be removed by the proposed additional mining at Warramboo and that modelled high and medium prospectivity habitat extend beyond the approved and proposed mine pit areas, it is
high prospectivity habitat) • 59 ha of modelled medium prospectivity habitat at Warramboo (1% of current modelled medium prospectivity habitat) • 1,072 ha of modelled high prospectivity habitat at Highway/Tod Bore (17% of current modelled high proposes to prospectivity habitat) • 88 ha of modelled medium prospectivity habitat at Highway/Tod Bore (1% of current modelled medium prospectivity habitat at Highway/Tod Bore (1% of current modelled medium prospectivity habitat at Highway/Tod Bore (1% of current modelled medium prospectivity habitat at Highway/Tod Bore (1% of current modelled with waste ruto continue to continue to continue to continue to the condition of pre-mining habitat on Mesa A. Excavation will remove up to 50% by volume of pre-mining habitat on Mesas B and C.	subject to a new Ministerial Statement for the Revised Proposal (Appendix 2). The conditions of the new Ministerial Statement shall require the Proponent to implement an EMP (Appendix 4) to ensure suitable troglofauna habitat is retained. The Proponent also proposes to conduct troglofauna sampling in the Warramboo and Highway/Tod Bore area and in the MEZs at Mesas A, B and C to verify persistence of troglofauna. Rehabilitation: The Proponent proposes to backfill pits with waste rock material where mine schedules allow and to continue to monitor subterranean temperature and humidity at Mesa A. The conditions of the new Ministerial Statement for the Revised Proposal shall require the Proponent to implement a Closure Plan in accordance with the DMP / EPA Guidelines for Preparing Mine Closure Plans (2015). The Closure Plan (Appendix 3) includes a closure	considered the proposed mining at Warramboo can be conducted such that the ecological integrity of troglofauna habitat in the Warramboo area is maintained. Highway/Tod Bore It is estimated that the proposed pit development at Highway/Tod Bore will result in loss of 17% and 1% of high and medium prospectivity habitat respectively in the limit of high confidence modelling. Given the extent of modelled high and medium prospectivity habitat that will remain around the Highway/Tod Bore area during and after the proposed mining operation, it is likely that further sampling and investigation will demonstrate that the Proposed Change can be managed to retain the ecological integrity of the troglofauna habitat at Highway/Tod Bore.

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Potential impacts	Mitigation to address potential impacts	Predicted outcome
	objective to ensure the final landform is stable and considers ecological values. Pit will be backfilled against narrow areas ('fingers') of MEZ where they occur, to ensure landform stability and potential connectivity of troglofauna habitat in the long-term. Other legislation: The Proponent will adhere to the requirements of the WC Act.	Mesas A, B and C The Proposed Change has been designed to retain at least 50% by volume of connected pre-mining habitat at Mesas A, B and C through delineation of MEZs. Data collected from Mesa A indicate that the MEZ at Mesa A is functioning as intended to provide suitable habitat for persistence of troglofauna adjacent to the active mining operation. It is, therefore, considered that the proposed MEZs at Mesas A, B and C will continue to provide suitable troglofauna habitat and that the Proposed Change will retain the ecological integrity of the troglofauna habitat. The Proponent considers that the Proposed Change can be managed to meet the EPA's objective for this factor.
Direct impact: loss of individuals and changes to troglofauna assemblages due to mine pit development Excavation will result in the loss of individuals and has the potential to result in changes to troglofauna assemblages. The troglofauna habitat contained within the mesa landforms at Mesas A, B and C has conservatively been assessed as being isolated from the surrounding landscape.	The following key management strategies will be implemented to manage impacts to troglofauna as a result of mine pit development: Avoid: The mine plans for Mesas A, B and C have been designed to avoid as many single location and singleton troglofauna as practicable and ensure their ongoing avoidance by the retention of a MEZ. Additional sampling will be undertaken with the aim of increasing the recorded occurrences of current single location and singleton troglofauna taxa. Minimise: Impacts to troglofauna taxa and assemblages will be minimised through retention of connected habitat that is at least 50% by volume of the pre-mining troglofauna habitat at Mesas A, B and C through designation of MEZs.	Warramboo Other than the record of Tyrannochthonius, sp. 'Warramboo' which was assessed and approved for disturbance as part of the Mesa A/Warramboo Iron Ore Project, all troglofauna taxa recorded in the proposed impact area at Warramboo have been recorded elsewhere. It is, therefore, considered that the Proposed Change is unlikely to significantly impact the diversity and ecological integrity of the troglofauna assemblage at Warramboo. Highway/Tod Bore One potential SRE troglofauna species, Cryptops sp. 'CHI002', recorded only in the proposed impact area at Highway/Tod Bore will be impacted by the Proposed Change. This single record is unlikely to represent the

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Potential impacts	Mitigation to address potential impacts	Predicted outcome
	The Proponent proposes that mine pit development be subject to a new Ministerial Statement for the Revised Proposal (Appendix 2). The conditions of the new Ministerial Statement shall require the Proponent to implement an EMP (Appendix 4) to ensure suitable troglofauna habitat is retained. Rehabilitation: The conditions of the new Ministerial Statement for the Revised Proposal shall require the Proponent to implement a Closure Plan in accordance with the DMP / EPA Guidelines for Preparing Mine Closure Plans (2015). The Closure Plan (Appendix 3) includes a closure objective to ensure the final landform is stable and considers ecological issues. Other legislation: The Proponent will adhere to the requirements of the WC Act.	true distribution of this species and is likely to be an artefact of sampling effects (Biota 2017a). Given that high and medium prospectivity habitat will continue to be available both within and beyond the western portion of the Development Envelope and that Cryptops sp. 'CHI002' is likely to have a wider distribution that extends beyond the proposed impact area, it is likely that further sampling and investigation will demonstrate that the Proposed Change can be managed to retain the ecological integrity of troglofauna habitat at Highway/Tod Bore. Mesa B and C Fourteen potential SRE troglofauna species are currently known only from the proposed impact areas at Mesas B and C (11 from Mesa B and three from Mesa C). Robe Pisolite is present across the entirety of each mesa formation, no geological barriers or faults are known in Mesas B or C and the confirmed SRE species, Paradraculoides bythius (listed as Threatened — Vulnerable), has been recorded across the full extent of Mesa B and almost across the full extent of Mesa C, indicating that the troglofauna habitat on each mesa is well connected and extends beyond the proposed impact area, into the proposed MEZ. Given the evidence for connectivity of habitat beyond the proposed impact area and the retention of at least 50% by volume of the pre-mining habitat at each mesa, it is considered that the taxa currently recorded only from inside the proposed impact area are likely to have distributions that extend beyond the proposed impact area.

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Potential impacts	Mitigation to address potential impacts	Predicted outcome
		It is, therefore, considered that the Proposed Change can be managed such that diversity and ecological integrity of the troglofauna assemblages at Mesas B and C are maintained.
		Mesa A All troglofauna taxa recorded from the proposed additional mining area at Mesa A have been recorded elsewhere in
		the Mesa A MEZ. It is, therefore, considered that the Proposed Change can be managed such that diversity and ecological integrity of the troglofauna assemblage at Mesa A is maintained.
		The Proponent considers that the Proposed Change can be managed to meet the EPA's objective for this factor.
Indirect impact: temporary reduction in or degradation of habitat due to mining-related activities Mining-related activities such as clearing of vegetation and placement of mineral waste, disposal of waste fines and reverse osmosis plant effluent, blasting, exposure of pit faces and hydrocarbon spills may result in temporary loss or degradation of troglofauna habitat.	The following key management strategies will be implemented to manage impacts to troglofauna from activities that may result in the temporary loss or degradation of habitat.	Given that the Proposed Change has been designed to minimise clearing, including placement of mineral waste in mined out pits wherever practicable and that disturbed areas will be rehabilitated once they are no longer required
	Avoid: Warramboo was selected as the preferred location for the WFSF rather than the alternative location of in-pit at Mesa A in order to avoid impacts to the higher value troglofauna habitat retained in the pit floor at Mesa A.	by the Proposed Change, impacts from loss of vegetation and placement of mineral waste material are likely to be localised and temporary and are unlikely to significantly degrade troglofauna habitat.
	Hydrocarbon storage and servicing and re-fuelling of plant and vehicles will not occur within the MEZs at Mesas A, B and C.	Given the area proposed for the WFSF has been previously mined; that suitable troglofauna habitat exists outside the area; and given the temporary nature of the
	Minimise: Clearing within the MEZs at Mesas A, B and C will be minimised and limited to infrastructure such as tracks, utilities, telecommunications, monitoring stations and abandonment bunds. Mineral waste dumps required	disturbance that may result from seepage from the WFSF, it is considered that the Proposed Change can be managed such that the continuity and ecological integrity of the troglofauna habitat at Warramboo are maintained.

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Potential impacts	Mitigation to address potential impacts	Predicted outcome
	as part of the Proposed Change will be located either in-pit or off the mesa in order to minimise clearing in the MEZ. Rehabilitate: The Closure Plan (Appendix 3) includes a closure objective to ensure that final landform is stable and considers ecological values and that vegetation is self-sustaining. Progressive rehabilitation will be undertaken which will assist in re-establishing nutrient flows into the subterranean environment. Offsets: The Proponent proposes the provision of an environmental offset at the higher offset rate (\$1,500 per hectare) for the unavoidable clearing of areas with other environmental values: PECs (the Subterranean invertebrate community of mesas in the Robe Valley region and the Subterranean invertebrate community of pisolitic hills in the Pilbara).	Monitoring results from Mesa A indicate that vibrations from blasting are not resulting in significant changes to subterranean cavities in the Mesa A MEZ (Section 6.4.1.2). Blasting conducted as part of the Proposed Change is, therefore, unlikely to affect the integrity of troglofauna habitat in the MEZs at Mesas A, B and C. Monitoring at Mesa A indicates that mining has had little discernible influence on the subterranean temperature and humidity in the Mesa A MEZ (Section 6.4.1.2). It is, therefore, considered that exposure of pit faces as part of the Proposed Change is unlikely to significantly alter the subterranean temperature and humidity in the MEZs at Mesas A, B and C. Given the proposed hydrocarbon management measures, hydrocarbon spills are unlikely to significantly degrade troglofauna habitat. The Proponent considers that the Proposed Change can be managed to meet the EPA's objective for this factor.

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6.4.6.2 Management Plan

The management actions in the current Mesa A Troglofauna Fauna Management Plan have been reviewed and, where appropriate, incorporated into the draft Mesa A Hub EMP (Appendix 4). Subject to approval, the Mesa A Hub EMP will supersede the current Mesa A Troglofauna Management Plan.

Review of the sampling of troglofauna conducted under the current Troglofauna Management Plan indicated that the current sampling is providing valuable data that demonstrate persistence of troglofauna in the MEZ at Mesa A. The Proponent considers the troglofauna sampling program can be improved by:

- Increasing the area sampled to include Mesas B and C, Warramboo,
 Highway/Tod Bore and Dinner Camp Bore in addition to the currently sampled area at Mesa A
- Utilising both scraping and trapping troglofauna sampling methods at all holes
- Defining the timing of sampling and the minimum number of holes to be sampled
- Identifying all specimens to species level and aligning specimens with existing taxa/specimens where possible.

The proposed improvements to the current troglofauna sampling program are discussed in further detail in the draft Mesa A Hub EMP (Appendix 4).

Review of the measurement of subterranean temperature and humidity conducted under the current Troglofauna Management Plan indicated that the current monitoring is providing valuable data about the subterranean environment. The Proponent, therefore, proposes to continue monitoring of subterranean temperature and humidity at Mesa A. The proposed changes to the pit design at Mesa A will result in decommissioning of one of the troglobitic fauna habitat monitoring stations; 11 monitoring stations will remain accessible. The Proponent proposes to continue monitoring at Mesa B by relocating the three current reference locations to the proposed MEZ at Mesa B thus ensuring continuity of data collection from Mesa B as far as possible. Establishment of an additional three monitoring locations at Mesa F as reference sites is also proposed. The design of the proposed subterranean temperature and humidity monitoring program thus includes monitoring before mining (Mesa B), during mining (Mesa A and subject to approval, Mesa B) and in reference habitat (Mesa F). Given the mesas in the Robe Valley comprise the same pisolite geology with similar inter-stratigraphic features and similar occurrence of cavities, the subterranean temperature and humidity data collected from Mesas A, B and F will provide data to assess potential impacts of mining that is relevant to all mesas in the Robe Valley.

The impact of blasting and mining on the integrity of troglofauna habitat at Mesa A has been examined annually since commencement of mining in 2010 using an optical televiewer probe. Impacts that could be attributed to mining operations have not been detected. As monitoring of potential impacts from blasting and mining have not been detected over a significant period, it is considered that additional monitoring would not provide any further insight into potential impacts, nor could the results be usefully linked to triggers and thresholds. Optical televiewer assessment has, therefore, not been included in the draft Mesa A Hub EMP.

A review characterising troglofauna habitat and the potential for reconstruction of habitat was undertaken in 2013 (Biota and D.C. Blandford & Associates 2013). The review concluded that air-filled cavities and a constantly high relative humidity are the key

troglofauna habitat requirements. Current methods for placing waste rock material in-pit are unlikely to result in a structure with cavities similar in size and connectivity to those in the natural mesa formations. Despite these limitations sampling from drillholes that run through waste dumps and into the formation below has yielded troglofauna, demonstrating that troglofauna continue to use habitat under waste dumps and/or use the waste dumps themselves. Further work is underway to establish whether the habitat beneath the waste dump or the waste dump itself is being utilised. Troglofauna sampling beneath the pit floor and in waste dumps will continue at Mesas A and K but has not been included in the Mesa A Hub EMP as this sampling is dependent on the limited availability of, and access to, drill holes in the active mining area

6.5 Stygofauna

6.5.1 Receiving environment

6.5.1.1 Surveys and studies

Sampling for stygofauna was undertaken in water monitoring sites, stock-wells and production bores within or near the Warramboo borefield (including sites in the Yarraloola area to the north of the Development Envelope) in 2006 (Biota 2006b). The survey was undertaken to address the potential impacts on stygofauna arising from the then proposed Mesa A/Warramboo Iron Ore Project which required a local groundwater source to supply production water for the proposed mining operations.

One Level 2 stygofauna study has subsequently been undertaken specifically for the Proposed Change (Biota 2017d) which comprised a detailed desktop assessment along with a three phase survey at Warramboo (between June 2015 and December 2016) and a two-phase survey at Mesa C (between December 2016 and March 2017). Biota (2017d) considered stygofauna recorded within the modelled extent of drawdown at Warramboo and Mesa C as well as within an area extending 10 km around the modelled drawdown extent at Warramboo ('Warramboo buffer area') and Mesa C ('Mesa C buffer area') (refer Figure 6-31) and within the broader Robe Valley.

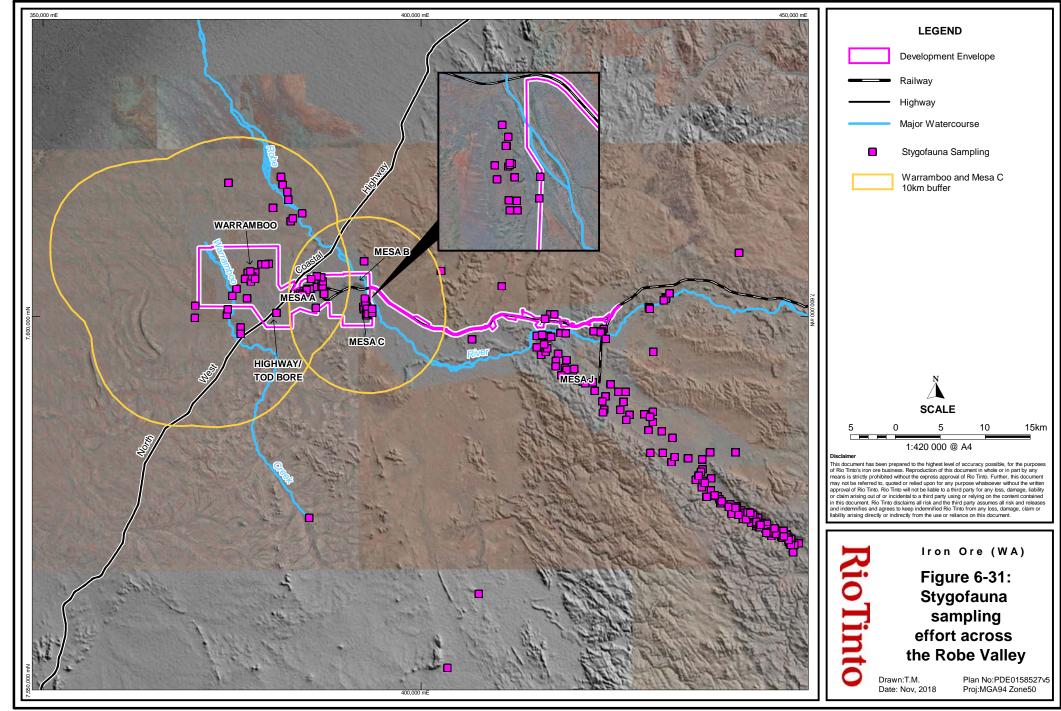
In addition, three aquatic fauna surveys have been undertaken as part of the Proposed Change investigations: a baseline sampling program for aquatic ecosystems of Warramboo Creek in 2016 and 2018 (WRM 2016, 2018); and a baseline sampling program for aquatic ecosystems of the Robe River/Mungarathoona Creek, adjacent to Mesas B and C (WRM 2017). While these surveys do not target subterranean fauna or stygofauna, stygobites (obligate groundwater dwellers) do occasionally get caught as bycatch. Eight stygofauna species were recorded as by-catch during these surveys (five previously recorded and three new species).

Stygofauna sampling effort across the Robe Valley is shown in Figure 6-31. Stygofauna species recorded are described in Section 6.5.1.3 and the aquatic fauna surveys are described further in Section 7.4.

Table 6-23: Summary of supporting stygofauna surveys

Report	Summary	Survey date
Mesa A/Warramboo and Yarraloola Borefield Development Baseline Stygofauna Assessment Biota (2006b)	A survey for stygofauna within or near the Warramboo borefield. Sites sampled included monitoring sites, stock-wells and production bores in the Warramboo borefield area and in the Yarraloola area to the north of the Development Envelope. The survey was undertaken to address the potential impacts on stygofauna arising from the then proposed Mesa A/Warramboo Iron Ore Project to use local groundwater to supply production water for the proposed mining operations.	October 2005
Mesa A Hub: Warramboo and Mesa C Stygofauna Assessment Biota (2017d)	Biota (2017d) undertook a Level 2 stygofauna survey comprising a desktop assessment along with three phases of sampling in and around the Warramboo area (between June 2015 and December 2016), and two phases in and around the Mesa C area (between December 2016 and March 2017). A total of 25 sites were sampled for stygofauna at Warramboo: seven sites located outside of the modelled drawdown extent and 18 sites located within the modelled drawdown extent. A total of 23 sites were sampled for stygofauna at Mesa C: 10 sites located outside the modelled drawdown extent and 13 sites located within the modelled drawdown extent and 13 sites located within the modelled drawdown extent.	April, June, September and October 2015 December 2016 March 2017

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6.5.1.2 Habitat

The hydrogeology of the western portion of the Development Envelope is described in Section 8.4.

The likely habitats for stygobitic fauna in the study area were characterised using regional information, site specific geological data and stygofauna survey results. Four key geological units occur BWT at Mesa C and Warramboo including:

- Robe Pisolite
- Alluvium
- Yarraloola Conglomerate (occurs at Warramboo only)
- Ashburton Formation.

The geology of Warramboo can be broadly summarised as unsaturated alluvium over Robe Pisolite which is then underlain by the Yarraloola Conglomerate and the basal Ashburton Formation. The Ashburton Formation is comprised of highly folded shale and siltstone and as such, generally exhibits little to no permeability, acting hydrologically as an aquiclude. The Ashburton Aquiclude intersects the water table to the west, south-east and east of Warramboo generating a no-flow boundary between Warramboo and Mesa A and between Warramboo and the Robe River. Other than the no-flow boundary generated by the Ashburton Aquiclude, stygofauna sampling results and hydrogeological data indicate that there is unlikely to be any significant physical barrier to stygofauna dispersal within the Yarraloola Conglomerate in the vicinity of the western portion of the Development Envelope and surrounds. Based on Geological Survey of WA 1:250,000 and 1:500,000 surface geology mapping, the Yarraloola Conglomerate is inferred to extend almost 200 km southwest towards the coast from the Development Envelope. The alluvium and unconsolidated material associated with the Robe River are inferred to extend the length of the Robe River; northwest from the Development Envelope to the coast and upstream of the Development Envelope to the headwaters of Bungaroo and Middle Robe/Deepdale, spanning approximately 230 km. Together these geological units are likely to provide primary habitat for stygofauna (Biota 2017d).

The Mesa C Aquifer occurs within the Robe Pisolite. Hydrogeological and geochemical data indicate that under steady state conditions or during seasons with inconsequential rainfall events the Mesa C Aquifer is likely to be isolated from throughflow recharge as the aquifer is bounded to the west and south by the Ashburton Aquiclude and to the east and bottom by the low permeability Ashburton Aquitard (Rio Tinto 2017c). Groundwater flow between the Mesa C Aquifer and the Robe River Aquifer via the Ashburton Aquitard is expected to be very low. Some groundwater flow may occur at the northern tip of the deposit where the Mesa C Aquifer intersects the Robe River Alluvial Aquifer, however, given the clayey nature of the basal pisolite, throughflow is expected to be minimal. During periods of high rainfall, an indirect connection between the Robe River Alluvial Aquifer and the Mesa C CID Aquifer may exist as the water table may rise above the Ashburton Aquitard, inducing infiltration into the Mesa C CID Aquifer from the Robe River streamflow. This recharge flow may then become trapped in the Mesa C CID Aquifer once the water level drops below that of the Ashburton Aquitard (Section 8.4.3.2 and Figure 8-3).

The likelihood of the geological units described above representing suitable habitat for stygofauna was categorised into Low, Moderate and High, based on the following characteristics (Biota 2017d; Table 6-24):

- A. Presence of interstitial spaces or vugs.
- B. Continuity and transmissivity of the local occurrence of submerged geological units.
- C. The known occurrence of stygal communities recorded from equivalent rock types during previous Pilbara surveys.
- D. Absence of large amounts of fine sediments such as clays, silts and sands within the geological unit description.
- E. Substrate permits inflow of surface water and infiltration of nutrients.
- F. Substrate is submerged below the water table.

Table 6-24: Stygofauna habitat prospectivity definitions (Biota 2017d)

Prospectivity	Definition
High	Majority (five or six) of characteristics confirmed for the geological unit, including the presence of continuous, transmissive aquifer (A, B). Geology sufficiently porous to allow nutrient infiltration from surface water run-off (E). Stygofauna routinely recorded from same rock type (C) and partially or completely submerged below the water table (F).
Medium	Unit likely partially or completely submerged below the water table (F). Presence of interstitial spaces (A), low numbers of stygofauna have been recorded from this geology previously (C). Small amounts of fine sediments within the unit (D).
Low	Suitable geological unit may occur only above the water table within the study area. Rock type might have interstitial spaces (A) however may have high levels of fine sediments which reduce usability of spaces. Stygofauna not known from previous studies sampling of the same geology (C).

Of the four key geological units, Alluvium and Robe Pisolite were categorised as high prospectivity habitat and considered likely to provide primary habitat for stygofauna where they occur BWT (Table 6-25 and Figure 6-32). Both the Robe Pisolite and alluvium geological units have been previously identified by the EPA as potential stygofauna habitat (Biota 2017d). The Yarraloola Conglomerate is categorised as having medium habitat prospectivity where it occurs BWT (Biota 2017d; Table 6-25 and Figure 6-32).

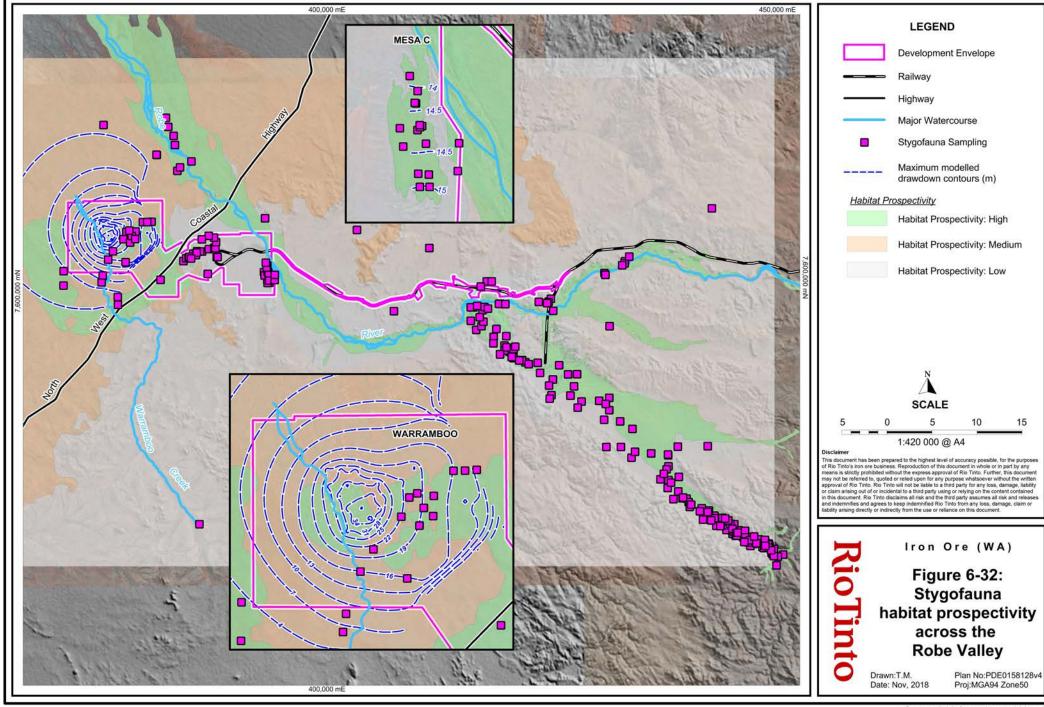
The Ashburton Formation was identified as low prospectivity stygofauna habitat as the general lack of permeability in this unit makes it unsuitable as stygofauna habitat (Biota 2017d; Table 6-25 and Figure 6-32).

Table 6-25: Stygofauna habitat prospectivity of the geological units within the study area

Habitat prospectivity	Geological unit	Description
High	Robe Pisolite	Pisolitic limonite deposits. Occurs along old river channels. Unit predominantly above water table.
	Alluvium	Unconsolidated fluviatile deposits, mostly sand.
Medium	Yarraloola Conglomerate	Polymictic conglomerate, which typically consists of pebbles of chert, BIF and/or quartz in oxidised (limonitic), sandy clays. Predominantly BWT within the study area.
Low	Ashburton Formation	Impermeable basement geological unit predominantly submerged within the study area.

No TECs, PECs or Environmentally Sensitive Areas relating to stygofauna occur in the western portion of the Development Envelope. The Priority 1 PEC, the Stygofauna community of the Bungaroo Aquifer, occurs approximately 30 km south-east of the Development Envelope.

Stygofauna habitat prospectivity across the Robe Valley is shown in Figure 6-32. Habitat prospectivity mapping was verified by overlaying specimen results and null records on the habitat prospectivity mapping.



6.5.1.3 Records

A total of 8,824 stygofauna specimens have been recorded in the broader Robe Valley, from an area spanning from the headwaters of the Bungaroo Valley to west of Warramboo between 2002 and 2016. Of these specimens, a total of 128 stygobitic taxa have been identified, including three species of conservation significance (Biota 2017d):

- Two amphipod species: Nedsia hurlberti and Nedsia sculptilis both listed as Threatened - Vulnerable under Schedule 3 of the WC Act
- The Blind Cave Eel: *Ophisternon candidum* listed as Threatened Vulnerable under the EPBC Act and Vulnerable under Schedule 3 of the WC Act.

In the combined Warramboo and Mesa B buffer areas a total of 85 taxa stygobitic taxa have been identified (Figure 6-33) of which one, *Nedsia hurlberti*, is listed as conservation significant.

A total of 71 stygobitic species have been recorded from the Warramboo buffer area. Of the species recorded only *Nedsia hurlberti* is listed as conservation significant and none are categorised as confirmed SRE species using the WA Museum SRE guidelines (Biota 2017d). The taxa recorded include:

- Nedsia hurlberti
- 16 potential SREs
- 54 widespread species.

The 16 potential SRE taxa are listed in Table 6-26. Species (including *Nedsia hurlberti*) were considered widespread where they were recorded in multiple locations throughout the Pilbara or other locations (such as Barrow Island). These species show little geological restriction and are unlikely to represent true stygobites or SREs.

Table 6-26: Potential SRE stygobitic species recorded from the Warramboo buffer area (Biota 2017d, WRM 2017)*

Order	Species	SRE status	Known locations
Amphipoda	Eriopisidae nov. gen. sp. 'AMM006'	Potential SRE	Warramboo buffer area
	Nedsia sp. 'AMM002'	Potential SRE	Warramboo buffer area
	Nedsia sp. 'AMM003'	Potential SRE	Warramboo buffer area
	Nedsia sp. 'AMM005'	Potential SRE	Warramboo buffer area
	Nedsia sp. 'AMM027'	Potential SRE	Warramboo buffer area
	Nedsia sp. 'AMM028'	Potential SRE	Warramboo buffer area
	Nedsia sp. 'AMM031'	Potential SRE	Warramboo buffer area and Mesa C buffer area
	Niphargidae sp. 'AMN001'	Potential SRE	Warramboo buffer area
	Niphargidae sp. 'AMN008'	Potential SRE	Warramboo buffer area
Bathynellacea	Atopobathynella sp. 'B25'	Potential SRE	Warramboo buffer area

Order	Species	SRE status	Known locations
Podocopida	Cypretta sp. '4'	Potential SRE	Warramboo buffer area
	Humphreyscandona imperfecta	Potential SRE	Warramboo buffer area. Also recorded from Fortescue River site approximately 58 km north of Warramboo and from a site 175km south- east of Warramboo
	Humphreyscandona pilbarae	Potential SRE	Warramboo buffer area Also recorded from Fortescue River site approximately 58 km north of Warramboo
	Meridiescandona sp. '2'	Potential SRE	Warramboo buffer area
	Origocandona sp. '2'	Potential SRE	Warramboo buffer area Also recorded from Fortescue River site approximately 58 km north of Warramboo.
Tubificida	Phreodrilus sp. 'WA32'	Potential SRE	Warramboo buffer area Also recorded from one Department of Parks and Wildlife Pilbara Stygofauna Survey site approximately 50 km west of Warramboo.

^{*} Widespread species excluded

Of the 71 stygobitic species recorded from the Warramboo buffer area, three were recorded during the aquatic fauna surveys undertaken at Warramboo in 2018 (WRM 2018):

- Candonopsis tenuis
- Vestalenula marmonieri
- Parastenocaris jane.

A total of 34 stygobitic species have been recorded from the Mesa C buffer area. Only *Nedsia hurlberti* is listed as conservation significant and none are categorised as confirmed SRE species using the WA Museum SRE guidelines (Biota 2017d). The taxa recorded include:

- Nedsia hurlberti
- 11 potential SREs
- 22 widespread species.

The 11 potential SRE taxa are listed in Table 6-27. The 22 widespread species recorded at Mesa C are unlikely to represent true stygobites or SREs and as such, these species have been excluded from further assessment in this ERD.

Of the 34 stygal taxa, five were recorded during the aquatic fauna surveys undertaken at Mesa B / C (WRM 2017):

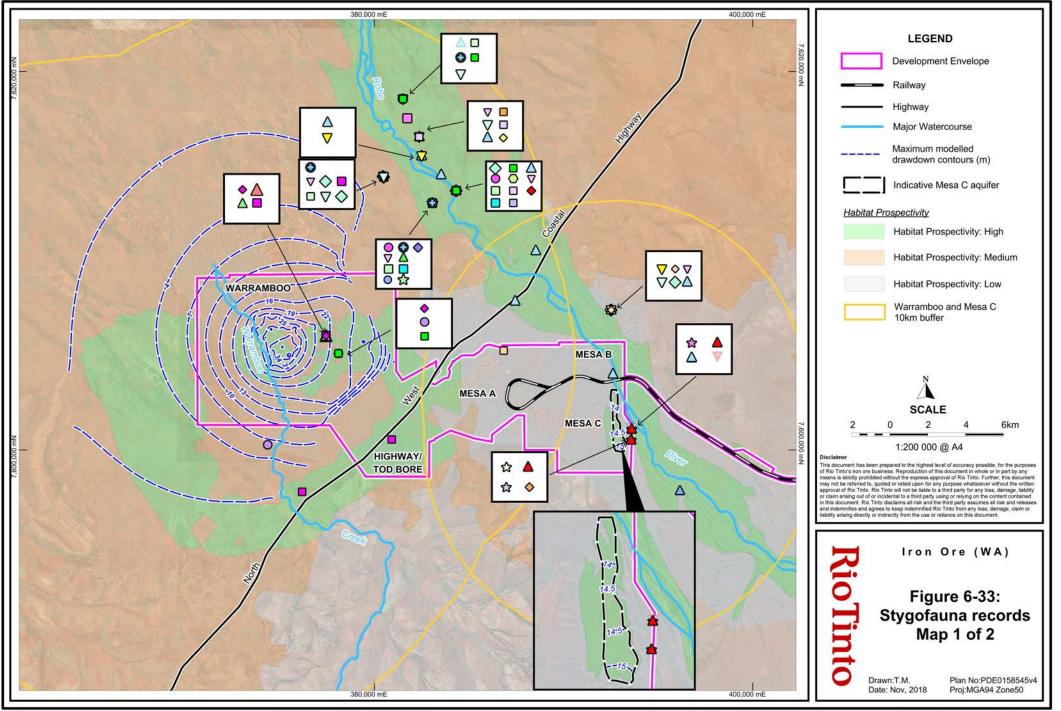
- Pilbarophreatoicus platyarthricus
- Halosbaena tulki
- Nedsia sp. 'AMM001/029/030' (also called Nedsia AMP-Eri-001)
- Candonopsis cf. tenuis
- Vestalenula marmonieri.

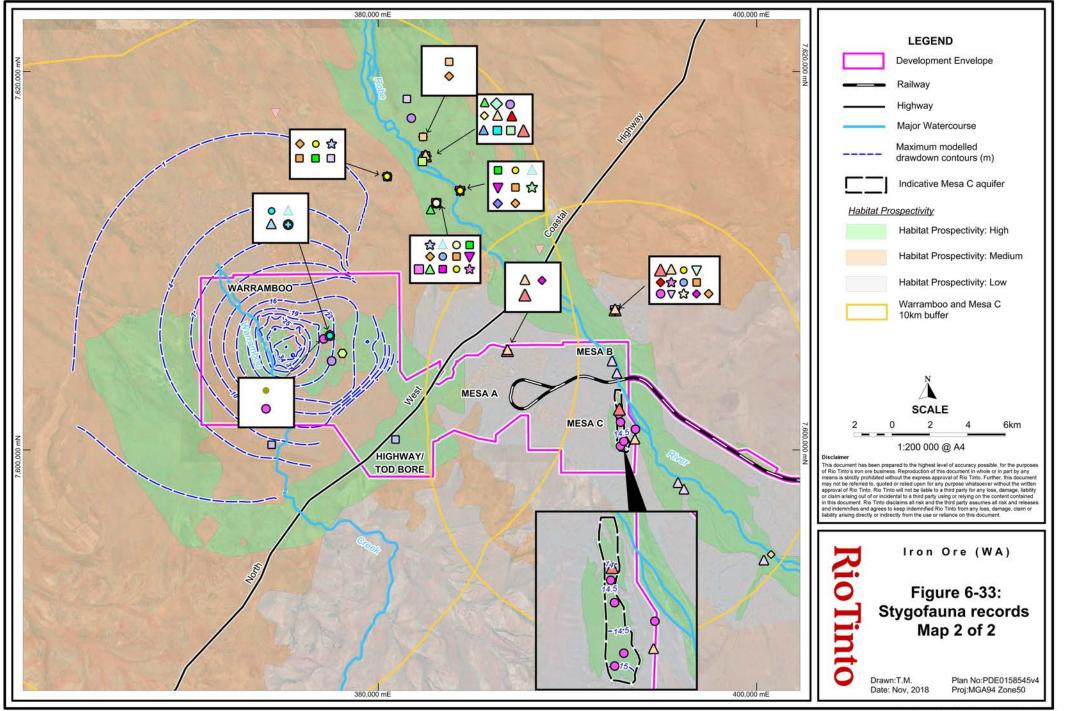
Following subsequent molecular work on the *Nedsia* taxa only *Pilbarophreatoicus* platyarthricus remains as a potential SRE taxa (see Western Australian Museum report in Appendix 2 of Biota 2017). *P. platyarthricus* is known from the Robe River catchment and its tributaries, including Mungarathoona Creek. The remaining four taxa are relatively widespread in the Pilbara region.

Table 6-27: Potential SRE stygobitic species recorded from the Mesa C buffer area (Biota 2017d, WRM 2017)*

Order	Species	SRE status	Known locations
Amphipoda	Nedsia sp. 'AMM004'	Potential SRE	Mesa C buffer area Also recorded from Mesa H
	Nedsia sp. 'AMM031'	Potential SRE	Mesa C buffer area and Warramboo buffer area
	Niphargidae sp. 'AMN007'	Potential SRE	Mesa C buffer area
	Niphargidae sp. 'AMN008'	Potential SRE	Mesa C buffer area
Cyclopoida	Dussartcyclops uniarticulatus	Potential SRE	Mesa C buffer area
Harpacticoida	Lucionitocrella yalleenensis	Potential SRE	Mesa C buffer area Described from site approximately 78 km east of Mesa C
	Megastygonitocrella unispinosa	Potential SRE	Mesa C buffer area Also recorded from Robe River site approximately 47 km north of Mesa C
Isopoda	Pilbarophreatoicus platyarthricus	Potential SRE	Robe River catchment and its tributaries, including Mungarathoona Creek
Ostracoda	Areacandona sp. BOS818	Potential SRE	Mesa C buffer area
Podocopida	Meridiescandona sp. '2'	Potential SRE	Mesa C buffer area
	Pilbaracandona sp. 'BOS526'	Potential SRE	Mesa C buffer area

^{*} Widespread species excluded





LEGEND Stygofauna species Map 1 Aeolosoma sp. 3 Apocyclops dengizicus (Lepeschkin) Areacandona astrepte Karanovic Areacandona scanloni Karanovic Areacandona sp. 'BOS818' Areacandona sp. 4 Arrenurus sp. nov. 2 Atopobathynella sp. 'B25' Atopobathynella sp. A Bathynella sp. 2 Bogidiellidae sp. 1

0 0 0 Candonopsis cf. tenuis Λ Cypretta seurati Gauthier Δ Δ Cypretta sp. 4 Deminutiocandona aenigma Karanovic 0 Dero furcata 0 Diacyclops einslei De Laurentiis et al. **\Q** Diacyclops sobeprolatus Karanovic

0

☼ Dussartcyclops uniarticulatus ■ Elaphoidella humphreysi Karanovic

Elaphoidella nr humphreysi Enchytraeus Pilbara sp. 1 A Enchytraeus Pilbara sp. 2 Eriopisidae nov. gen. sp. 'AMM006'

 ∇ Eriopisidae sp. 'AMM026' Gomphodella hirsuta Karanovic Guineaxonopsis sp. S1

→ Halicyclops (Rochacyclops) roachi De Laurentiis et al.

A Halosbaena tulki ▲ Haptolana yarraloola Humphreyscandona fovea

Humphreyscandona imperfecta Karanovic 0 ☐ Humphreyscandona pilbarae Karanovic and Marmonier

Humphreyscandona woutersi Karanovic and Marmonier ∇

Kagalana tonde Bruce ★ Lucionitocrella yalleenensis Megastygonitocrella unispinosa

Melitidae sp. 1

Stygofauna species Map 2

Meridiescandona sp. 2

Metacyclops pilbaricus Karanovic

Microcyclops varicans

Namanereis sp. '1'

Nedsia nr hurlberti

Nedsia sp. 24

Nedsia sp. 'AMM001/029/030' Δ

0 Nedsia sp. 'AMM002'

0 Nedsia sp. 'AMM003'

0 Nedsia sp. 'AMM004'

Nedsia sp. 'AMM005'

Nedsia sp. 'AMM027'

Nedsia sp. 'AMM028'

Nedsia sp. 'AMM031'

Nematoda sp. 11 Nematoda sp. 2

0 Nematoda sp. 3

Niphargidae sp. 'AMN001' Niphargidae sp. 'AMN008'

公 Niphargidae sp. 'AMN007'

Niphargidae sp. 'AMN008' 公 Orbuscyclops westaustraliensis Karanovic

0 Oribatida group 1

☆ Oribatida group 4

Origocandona sp. 2

Paracyclops chiltoni Paramelitidae sp. 'AMP009'

Paramelitidae sp. 'AMP023'

V Paramelitidae sp. 2

Δ Parapseudoleptomesochra tureei Karanovic

Δ Phreodrilid with dissimilar ventral chaetae

Phreodrilid with similar ventral chaetae

0 Phreodrilus n. sp. WA32

Pilbaracandona rosa Karanovic

V Pilbaracandona sp. 'BOS526'

0 Pilbarophreatoicus platyarthricus

* Pilbarus millsi Bradbury and Williams

Pristina longiseta

Pseudectinosoma galassiae Karanovic

Schizopera roberiverensis

Schizopera roberiverensis Karanovic

Stygonitocrella trispinosa Karanovic 0

0 Stygonitocrella unispinosa Karanovic

Stygoridgewayia trispinosa

Thermocyclops decipiens

Tubificidae stygo type 2A 0

▲ Vestalenula marmonieri

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Iron Ore (WA)

Stygofauna records Legend Map 1 and Map 2

Plan No:PDE0158545v1 Drawn:T.M. Date:February, 2018 Proj:MGA94 Zone50

6.5.2 Potential impacts

A number of potential impacts are identified in the ESD. The potential direct, indirect and cumulative impacts identified for the Proposed Change on the basis of stygofauna surveys and assessments are described in Sections 6.5.2.1 to 6.5.2.3.

6.5.2.1 Direct impacts

Potential direct impacts of the Proposed Change have been identified as:

- Reduction in stygofauna habitat due to BWT pit excavation at Warramboo and Mesa C (physical removal of habitat)
- Reduction in stygofauna habitat due to groundwater abstraction resulting in groundwater drawdown at Warramboo and Mesa C
- Loss of individuals and changes to assemblages due to groundwater abstraction and BWT mining at Warramboo and Mesa C.

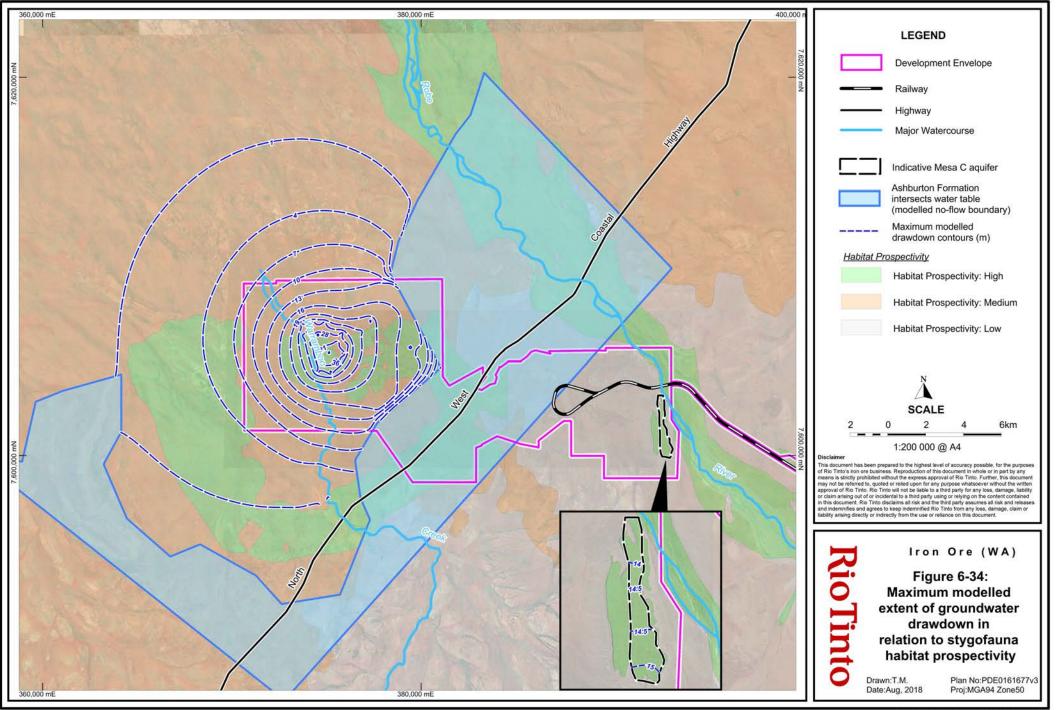
BWT mining and groundwater abstraction are not proposed at Mesas A and B and Highway/Tod Bore, so no direct impacts related to stygofauna are anticipated within these areas.

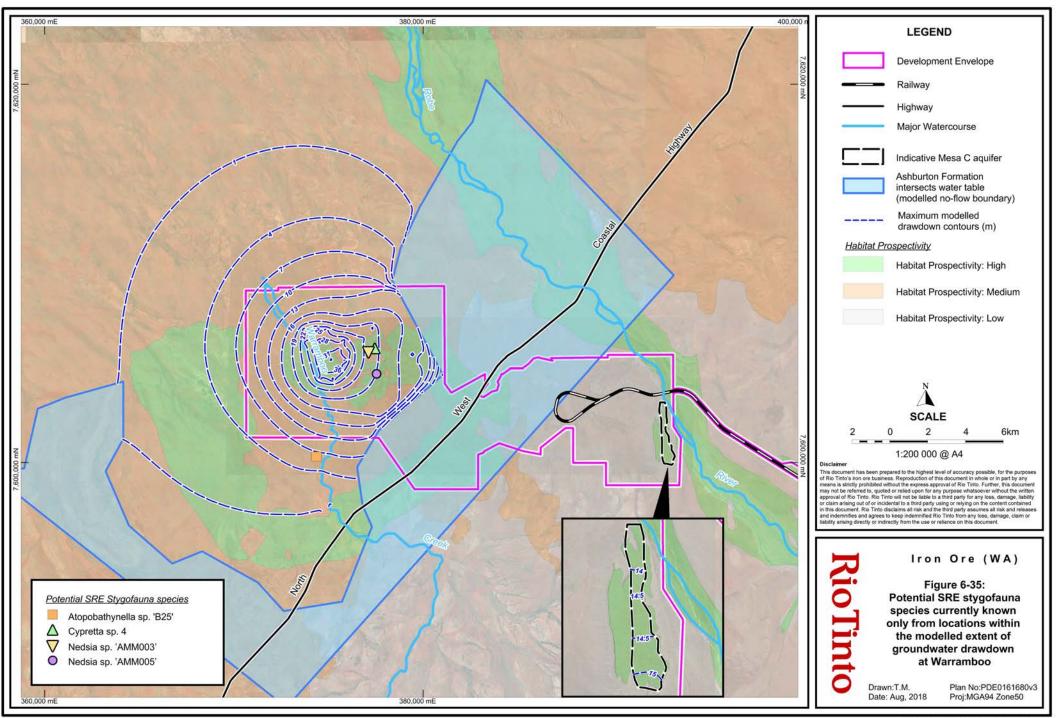
Figure 6-34 shows the maximum modelled extent of groundwater drawdown at Warramboo and Mesa C in relation to modelled stygofauna habitat prospectivity.

Sixteen potential SRE stygofauna species were recorded from the Warramboo buffer area (Table 6-26) of which four are currently known only from within the modelled extent of drawdown at Warramboo (Figure 6-35):

- Atopobathynella sp. 'B25'
- Cypretta sp. '4'
- Nedsia sp. 'AMM003'
- Nedsia sp. 'AMM005'.

Two stygofauna species were recorded at Mesa C (*Nedsia* sp. 'AMM004' and *Nedsia* sp. 'AMM031'). Both of these species have also been recorded from the adjacent Robe River Alluvial Aquifer and the level of genetic divergence between the specimens from the two aquifers was established to be low (Biota 2017d).





6.5.2.2 Indirect impacts

Mining activities other than mine pit excavation and groundwater abstraction which may impact stygofauna through temporary loss or degradation of habitat include:

- Seepage from in-pit disposal of waste fines and reverse osmosis effluent which has the potential to change groundwater chemistry and degrade stygofauna habitat
- Hydrocarbon and wastewater spills which may result in a reduction in the quality of stygofauna habitat.

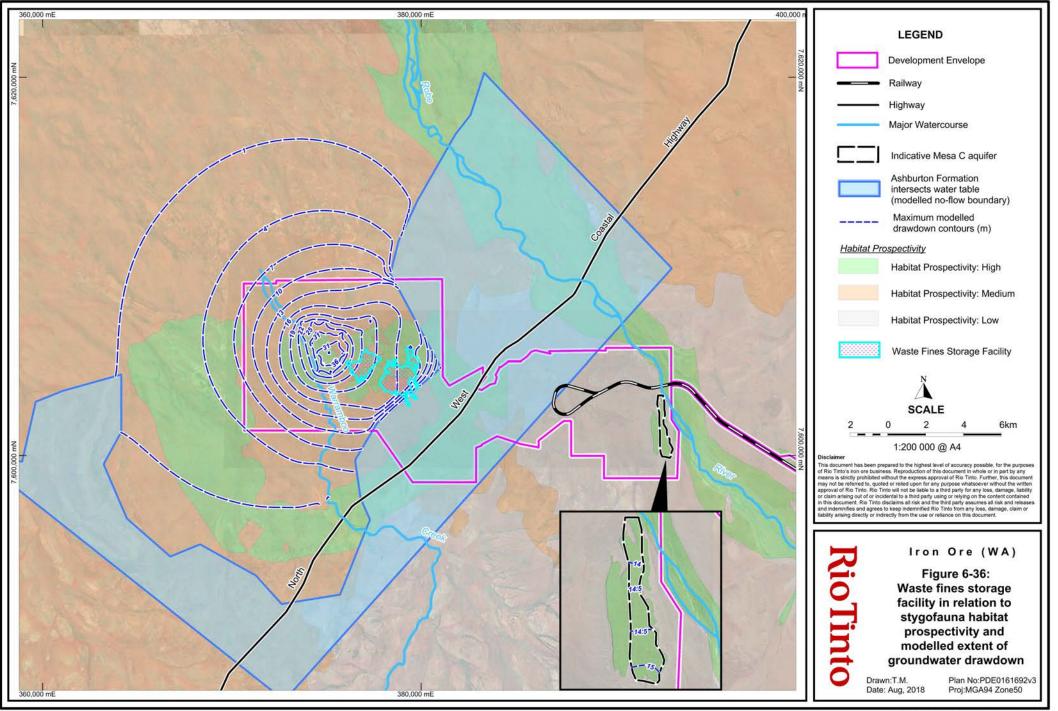
Figure 6-36 shows the location of the proposed WFSF in relation to stygofauna habitat prospectivity and the modelled drawdown contours.

6.5.2.3 Cumulative impacts

Existing and foreseeable groundwater users in the vicinity of the Development Envelope are identified in Section 8.5.3 and include:

- The approved activities
 - Groundwater license allowing up to 3 GL/a to be abstracted from the existing Warramboo borefield
- Yarraloola pastoral station
 - Six pastoral station bores within the modelled extent of drawdown for the Proposed Change
- Department of Main Roads
 - o One bore within the modelled extent of drawdown for the Proposed Change
- The Revised Proposal
 - Abstraction of up to 15 GL/a (including the currently licensed 3 GL/a) from the extended Warramboo borefield
 - o Abstraction of up to 5 GL/a from the Mesa C CID Aquifer.

The abstraction rates from the pastoral station bores and the Department of Main Roads bore are likely to be negligible compared with the proposed abstraction rate for the Proposed Change. Groundwater abstraction from the pastoral station and Department of Main Roads bores are, therefore, unlikely to significantly impact stygofauna habitat.



6.5.3 Assessment of impacts

6.5.3.1 Direct impacts

Reduction in stygofauna habitat due to mine pit development and groundwater abstraction

The habitat characterisation undertaken by Biota (2017d) indicates stygofauna habitat is generally widespread across at least a third of the mapped broader Robe Valley area. The widespread nature of the habitat and the confirmation that at least 63 of the species recorded in the Warramboo and Mesa C buffer areas are considered widespread and occur in the wider Pilbara region, indicate that there is little evidence of significant barriers to dispersal across the mapped high and medium habitat prospectivity areas.

Warramboo

Eighty-nine percent of the Robe Pisolite deposit at Warramboo lies above the pre-mining water table and therefore very little of the deposit is suitable as stygofauna habitat. The Robe Pisolite is incised into the Yarraloola Conglomerate and where the Robe Pisolite intersects the water table, water throughflow is largely unconfined due to the presence of cavities in the Robe Pisolite. The proposed reduction in stygofauna habitat due to BWT mining of the Robe Pisolite at Warramboo is negligible compared with the extent of the connected Yarraloola Conglomerate.

The Yarraloola Conglomerate is considered to represent medium prospectivity habitat in the area (Biota 2017d). The Yarraloola Conglomerate is an extensive regional aquifer that extends to the west of Warramboo. The geology of the Warramboo area and the widespread distributions of most taxa recorded indicate there are unlikely to be any significant barriers to stygofauna dispersal within the proposed impact area or adjacent habitat to the north and west of the modelled extent of drawdown. Based on the inferred extent of the Yarraloola Conglomerate and hydrogeological modelling, it is estimated that the modelled cone of depression would impact less than 2% of the area of the Yarraloola Conglomerate (Rio Tinto 2017c). Extensive stygofauna habitat will, therefore, continue to be available outside the impact area during and after mining operations.

Hydrogeological modelling indicates that water abstraction at Warramboo for mine dewatering and water supply will temporarily reduce the saturated thickness of the aquifer by up to 70% at the centre of the cone of depression, reducing to approximately 2% of the saturated aquifer thickness approximately 12 km from the centre of the cone of depression. Stygofauna habitat (>19 m thick) will, therefore, continue to be available during and after mining operations within the footprint of the proposed groundwater drawdown. Following cessation of groundwater abstraction, recovery of the groundwater table, and hence recovery of stygofauna habitat, is expected to occur. Modelling indicates recovery of the groundwater table to 80% of the pre-mining groundwater level is expected to take approximately 40 years.

Given the small proportion of available habitat that will be impacted by the proposed groundwater drawdown and pit excavation at Warramboo and the lack of potential barriers to dispersal of stygofauna to the north and west of the area, it is considered that the Proposed Change is unlikely to significantly affect the ecological integrity of the stygofauna habitat in the Warramboo area.

Mesa C

Approximately 5% of the Mesa C orebody lies BWT at a depth of approximately 50 m below the surface of the mesa. Very little of the deposit is, therefore, suitable as stygofauna habitat.

As discussed in Section 6.5.1.2, hydrogeological test work indicates that the Mesa C CID Aquifer may be seasonally recharged from Robe River streamflow and the Robe River Alluvial Aquifer during periods of high rainfall. The Robe River Alluvial Aquifer is an extensive aquifer present along the length of the Robe Valley passing in close proximity to Mesa C. This aquifer is considered to represent high prospectivity stygofauna habitat (Biota 2017d). Recharge from the Robe River Alluvial Aquifer is likely to carry stygofauna with it, resulting in stygofauna potentially being deposited in the Mesa C Aquifer or dispersing from the Mesa C Aquifer into the wider groundwater system.

Results of stygofauna sampling from the Mesa C CID Aquifer indicate that recharge of the Mesa C CID Aquifer occurs on a reasonably frequent basis as the two stygofauna species recorded at Mesa C (*Nedsia* sp. 'AMM004' and *Nedsia* sp. 'AMM031') have also been recorded from the Robe River Alluvial Aquifer and the level of genetic divergence between the specimens from the two aquifers was low (Biota 2017d). Together the hydrogeological test work and stygofauna sampling results indicate that the Mesa C CID Aquifer is seasonally connected to the extensive stygofauna habitat present in the adjacent Robe River Alluvial Aquifer.

Given the evidence indicating connection of the Mesa C CID Aquifer with extensive high prospectivity habitat and the small proportion of available stygofauna habitat represented by the Mesa C CID Aquifer, it is considered that the Proposed Change is unlikely to significantly affect the ecological integrity of stygofauna habitat in the Mesa C area.

Loss of individuals and changes to assemblages due to mine pit development and groundwater abstraction

Mine pit excavation and groundwater abstraction will result in the direct loss of individuals. Sixteen potential SRE stygofauna species were recorded from the Warramboo buffer area (Table 6-26) of which five were recorded from within the modelled Warramboo drawdown extent. Of the five species recorded in the Warramboo drawdown extent, four (*Atopobathynella* sp. 'B25', *Cypretta* sp. '4', *Nedsia* sp. 'AMM003', *Nedsia* sp. 'AMM005') have currently been recorded only from within the modelled drawdown extent (Figure 6-35). The single conservation significant species, *N. hurlberti*, recorded in the vicinity of the western portion of the Development Envelope was not recorded within the drawdown extent. Eleven potential SRE species were recorded from the Mesa C buffer area of which two (*Nedsia* sp. 'AMM004' and *Nedsia* sp. 'AMM031') were recorded in the modelled Mesa C drawdown extent. Both of these species have also been recorded outside the modelled drawdown extent.

The EPA acknowledges that habitat may be used as a surrogate for inferring distributional boundaries of potentially restricted taxa (EPA 2016g and 2016h). Where a habitat type that supports a species is continuous then the extent of that habitat may be used to infer the likely presence of that species in the same habitat. The EPA also acknowledges that taxa with greater known distributions may act as surrogates to infer the distributions of poorly sampled species (EPA 2016g and 2016h).

Warramboo

The habitat characterisation undertaken by Biota (2017d) indicates stygofauna habitat is generally widespread across at least a third of the mapped broader Robe Valley area, extending well beyond the modelled impact areas and the Yarraloola Conglomerate is recognised as an extensive regional aquifer (Rio Tinto 2017d). Hydrogeological data indicate that intersection of the Ashburton Formation (known hydrogeologically as the Asburton Aquiclude) with the water table to the south and east of Warramboo generates a no-flow boundary. However, the stygofauna sampling results and geological and hydrogeological data indicate that there is unlikely to be any significant geological or hydrogeological barriers to stygofauna dispersal within the Yarraloola Aquifer to the north and west of the Development Envelope.

Mesa C

The stygofauna sampling results and hydrogeological data indicate that the Mesa C CID Aquifer is hydraulically connected to the extensive stygofauna habitat in the Robe River Alluvial Aquifer on a reasonably frequent basis. This alluvial aquifer is not expected to be impacted by the Proposed Change and therefore represents extensive connected and un-impacted stygofauna habitat. As described above (Section 6.4.3.1), the two stygofauna species recorded at Mesa C (*Nedsia* sp. 'AMM004' and *Nedsia* sp. 'AMM031') have also been recorded from the Robe River Alluvial Aquifer and the level of genetic divergence between the specimens from the two aquifers was confirmed to be low (Biota 2017d) which supports habitat connectivity.

The widespread nature of the habitat and the confirmation that at least 63 of the species recorded are considered widespread and occur in the wider Pilbara region, indicate that little evidence of significant barriers to dispersal across the mapped high and medium habitat prospectivity areas (Biota 2017d). It is therefore considered that the species recorded in the buffer areas at Warramboo and Mesa C, including the four species currently recorded only in the modelled Warramboo drawdown extent, are likely to have wider distributions that extend beyond the proposed impact areas. It is, therefore, considered that the Proposed Change is unlikely to have a significant impact on the diversity and ecological integrity of the stygofauna assemblages in the western portion of the Development Envelope.

6.5.3.2 Indirect impacts

Degradation of habitat due to mining related activities

Waste fines storage

In-pit storage of waste fines (from the entire Proposal) and disposal of effluent from the reverse osmosis plant is proposed at Warramboo. Seepage from in-pit disposal of waste fines and reverse osmosis effluent has the potential to change the local groundwater chemistry and degrade stygofauna habitat.

Based on results of monitoring around the Mesa J waste fines tailings storage facility (refer Section 8.6.3.2) it is anticipated that the proposed WFSF at Warramboo will result in increases in analytes such as salinity, nitrogen, nitrate, NOx and zinc in the immediate vicinity of the WFSF. DHI undertook modelling to assess the potential for changes to water quality as a result of groundwater drawdown extending towards naturally occurring higher salinity areas and seepage from the WFSF, using chloride as a suitable analyte (DHI 2018) (Section 8.6.3.2). The results showed naturally occurring areas of higher

chloride concentration located towards the coast to the west of the Warramboo pits will likely increase the chloride concentrations in some water supply bores over the life of mine, while the higher salinity areas located east of the Warramboo pit will have limited impact on water supply bores. The modelling also indicated groundwater chloride concentrations due to seepage from the WFSF will be contained within the cone of depression resulting from groundwater abstraction and that the majority of the increase in chloride concentration due to the presence of the WFSF will remain beneath the pit area and is not expected to reach water supply bores located approximately 400 m from the pit boundary (DHI 2018). Given chloride is generally a conservative solute, it can be inferred that other changes to groundwater chemistry will also be confined to the cone of depression resulting from groundwater abstraction.

Given that seepage from the WFSF will be confined to the cone of depression from the proposed extension to the Warramboo borefield during operations and that this cone of depression represents a small proportion of available stygofauna habitat (less than 2% of the area of the Yarraloola Conglomerate), it is considered that during operations, the Proposed Change is unlikely to significantly affect the ecological integrity of the stygofauna habitat provided by the Yarraloola Conglomerate.

Placement of waste fines into the WFSF will cease prior to closure. There will then be a limited period of time where seepage occurs from the waste fines until the WFSF dries out through a combination of evaporation and seepage, at which stage rehabilitation of the WFSF will be undertaken. Given the limited period of time required for 'drain-down' of the WFSF at closure and the extensive stygofauna habitat available around the Warramboo area, it is considered that at closure, the Proposed Change is unlikely to significantly affect the ecological integrity of the stygofauna habitat provided by the Yarraloola Conglomerate and the Robe River Alluvial Aquifer.

Hydrocarbon and wastewater spills

The potential exists for groundwater to be degraded by spills of hydrocarbons or wastewater. Hydrocarbons will be handled, stored and disposed of in accordance with legal requirements. Hydrocarbon storage will be inspected on a regular basis to identify any maintenance requirements. Hydrocarbon and spill management procedures are expected to effectively mitigate the risk of contamination.

6.5.3.3 Cumulative impacts

The existing and foreseeable groundwater users in the vicinity of the Development Envelope are identified in Section 6.5.2.3. Groundwater abstraction from the pastoral station and Department of Main Roads bores are unlikely to significantly impact stygofauna habitat as the abstraction rates are likely to be low relative to the size of the aquifer and relative to the groundwater abstraction rates associated with the Proposed Change.

Abstraction of groundwater from the existing Warramboo bore field for water supply to the Mesa A/Warramboo Iron Ore Project is approved under Ministerial Statement 756. The drawdown extent from the current approved groundwater abstraction falls within the modelled drawdown extent for the proposed bore field expansion. The assessment of impacts in Section 6.5.3.1 therefore incorporates the existing and proposed impacts.

No other existing or proposed mining operations that would contribute to cumulative impacts on stygofauna occur in the vicinity of the Development Envelope.

6.5.4 Closure

The Mesa A Hub Closure Plan (Rio Tinto 2017b) represents the updated closure plan for the Mesa A, B, C, Warramboo, Highway/Tod Bore operations and supersedes previous closure plans for the approved project. It is applicable to mine developments and associated infrastructure, excluding rail and road infrastructure, within the Development Envelope.

Following cessation of dewatering at Mesa C, the CID Aquifer groundwater level is unlikely to recover to pre-mining levels under steady state conditions; however, extensive rainfall and possibly increased surface run-off and infiltration into the mesa due to reduced vadose zone are likely to assist water level recovery in the CID Aquifer. The adjacent modelled seasonally connected high prospectivity habitat of the Robe River Alluvial Aquifer is not expected to be impacted by the Proposed Change.

Modelling indicates that the groundwater levels at Warramboo will recover. It is estimated that recovery of the groundwater table to 80% of pre-mining groundwater level will take approximately 40 years, with complete recovery of the groundwater level estimated to take up to 140 years due to anticipated low recharge rates (Rio Tinto 2017c).

A closure task has been identified to assess the potential for seepage from the WFSF into the Yarraloola Aquifer. This will ensure any seepage from the facility is considered in terms of any potential impact to groundwater chemistry and subterranean habitats.

6.5.5 Mitigation

Mitigation strategies to address the potential impacts and predicted outcomes are presented in Table 6-28.

Table 6-28: Mitigation measures and predicted outcomes for stygofauna

Potential impacts	Mitigation to address potential impacts	Predicted outcome				
EPA objective: To protect subterranean fauna so tha	EPA objective: To protect subterranean fauna so that biological diversity and ecological integrity are maintained.					
Direct impacts: Reduction in stygofauna habitat, loss of individuals and changes to assemblages due to mine pit development and groundwater abstraction	The following key management strategies will be implemented to manage impacts to stygofauna as a result of indirect impacts: Avoid: Additional water requirements will be sourced from an extension to the existing Warramboo borefield, avoiding the requirement for a new borefield impact area. Minimise: Dewatering will be minimised to that required to access the BWT resource. Water from mine dewatering will be used on-site where possible to minimise the requirement for additional groundwater abstraction for operational water supply. The Proponent will abstract groundwater within the licence limits and monitor groundwater levels to ensure impact remains within the predicted range of drawdown. Rehabilitation: BWT pits will be backfilled and/or used for storage of waste fines material enabling recovery of groundwater levels and stygofauna habitats following cessation of groundwater abstraction.	Geological/hydrological formation which represent potential stygofauna habitat are extensive in the area, and extend beyond the modelled extent of groundwater impact as a result of the Proposed Change. The Robe Pisolite is incised into the underlying Yarraloola Conglomerate which represents an extensive regional aquifer. The geology of the Warramboo area and widespread distributions of most stygofauna taxa recorded indicate there are unlikely to be any significant barriers to stygofauna dispersal to the west and north of the proposed impact area. Given the estimated saturated aquifer thickness is significantly greater than the maximum modelled drawdown; stygofauna habitat will continue to be available within the proposed borefield extension area and outside the impact area both during and after mining operations. Given the small proportion of available habitat that will be impacted by the proposed groundwater drawdown and pit excavation at Warramboo and the lack of potential barriers to dispersal of stygofauna to the west and north of the area, it is considered that although the Proposed Change will result in the loss of individuals, it is unlikely to significantly affect the ecological integrity of the stygofauna habitat or the diversity and ecological integrity of the stygofauna assemblages in the Warramboo area. Approximately 5% of the Mesa C deposit is BWT at a depth of approximately 50 m below the surface of the mesa. Very little of the deposit is, therefore, suitable as stygofauna habitat. Hydrogeological test work and stygofauna sampling results indicate that the Mesa C CID Aquifer is seasonally connected to the extensive stygofauna habitat present in the adjacent Robe River Alluvial Aquifer. Given the extent and connectivity with other primary habitats, such as the Robe River Alluvial Aquifer which is not expected to be impacted by the				

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Potential impacts	Mitigation to address potential impacts	Predicted outcome
		Proposed Change, it is considered that although the Proposed Change will result in the loss of individuals, it is unlikely to significantly affect the ecological integrity of stygofauna habitat or the diversity and ecological integrity of the stygofauna assemblages in the Mesa C area.
		The Proponent considers that the potential impacts can be managed and the residual impact will not be significant enough to warrant application of offsets.
Indirect impacts: Degradation of habitat due to mining-related activities Seepage from in-pit disposal of waste fines and reverse osmosis effluent and hydrocarbon spills have the potential to degrade stygofauna habitat.	The following key management strategies will be implemented to manage potential indirect impacts to stygofauna habitat: Avoid: Placing fines in-pit at Warramboo avoids the need to disturb a previously undisturbed area. Minimise: Hydrocarbons will be handled, stored and disposed of in accordance with legal requirements. Hydrocarbon storage will be inspected on a regular basis to identify any maintenance requirements. Spill response procedures will be followed to contain and clean-up any hydrocarbon spills. Rehabilitation: Any hydrocarbon spills will be contained and Hydrocarbon storage and handling facilities will be decommissioned at closure. Other legislation: Compliance with the requirements of the Contaminated Sites Act 2003 if contamination occurs.	Based on results of monitoring around the Mesa J waste fines tailings storage facility (Section 8.6.3.2) it is anticipated that the proposed WFSF at Warramboo will result in increases in analytes such as salinity, nitrogen, nitrate, NOx and zinc in the immediate vicinity of the WFSF. Modelling (DHI 2018) has shown that during operations the seepage from the WFSF will be confined to the cone of depression from the Warramboo borefield, representing disturbance to a small proportion of available stygofauna habitat (less than 2% of the habitat provided by the Yarraloola Conglomerate). Groundwater abstraction will cease prior to closure. Following cessation of groundwater abstraction, there will be a limited period of time when the tailings storage facility 'drains-down' and seepage from the WFSF will not be re-circulated through the wet processing plant. Given the extensive stygofauna habitat available around the Warramboo area and the limited period of time required for 'drain-down' of the WFSF at closure, it is considered that the Proposed Change is unlikely to significantly affect the ecological integrity of the stygofauna habitat provided by the Yarraloola Conglomerate. No significant impact on stygofauna habitat is expected from hydrocarbon storage or handling. The Proponent considers that the potential impacts can be managed and the residual impact will not be significant enough to warrant application of offsets.

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6.6 Peer review

A peer review of the proposed impacts to subterranean fauna and the proposed management approach was undertaken by Biologic (Biologic 2018, Appendix 7).

The review considered the potential impacts to subterranean fauna and the suitability of the proposed management of those impacts. In particular, the review focussed on the potential impacts to troglofauna, the potential impacts to retained troglofauna habitat and the suitability of the proposed habitat retention zones to sustain viable troglofauna habitats and assemblages if the Proposed Change were implemented. In doing so, the review considered troglofauna sampling, species assessment and habitat assessment. The review considered all troglofauna sampling, species assessment, habitat monitoring and habitat assessment undertaken in the Development Envelope. The review was conducted in parallel with preparation of the ERD and the draft Mesa A Hub EMP thus the outcomes from the review have been addressed in these two documents.

Table 6.1 of the peer review report (Appendix 7) provides a summary of key items noted during the peer review. Table 6.1 is reproduced below as Table 6-29 with an additional column noting how the Proponent has addressed the key items.

Table 6-29: Summary of key items identified by the subterranean fauna peer review

Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments			
Troglofauna Impact Ass	roglofauna Impact Assessment Documents						
2.1A	Moderate	Small changes to MEZ (33 ha ¹) unlikely to be significant to troglofauna. Unresolved uncertainties surrounding the effectiveness of the MEZ as a strategy for conserving restricted troglofauna species and assemblages.	Preclude any additional changes to the MEZ until uncertainties resolved and greater confidence in the effectiveness of the MEZ.	The Proponent agrees that the Proposed Change to the MEZ at Mesa A is unlikely to be significant to troglofauna. Results and analysis from sampling and monitoring at Mesa A and other areas in the Robe Valley have been included in Section 6.4.2.2. The data collected indicate that the MEZ at Mesa A is functioning as intended to provide suitable habitat for persistence of troglofauna adjacent to the active mining operation.			
2.2.1A	Major	Geological connectivity between Highway/ Tod Bore and CID habitats to the south-west (Dinner Camp Bore) indicated by detailed habitat modelling, but fauna data suggests high species turnover, possible habitat discontinuities. Although it is likely that some habitat occurs beyond impact areas at Highway / Tod Bore, the current information does not allow accurate assessment of how much habitat will be retained following mining.	Further investigations for species / habitat / assemblage comparisons in the following areas; A) high / mod prospective habitats immediately surrounding Highway / Tod Bore pits, B) high / mod prospective habitats extending to southwest of the pits at Highway/ Tod Bore. If no further investigations possible, assess potential for MEZ around Highway/ Tod Bore pits.	The Proponent agrees with the suggested strategy. Additional troglofauna sampling in the broader Warramboo area is currently underway and ongoing sampling is proposed in the Mesa A Hub draft EMP.			

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments
2.2.1B	Major	Current fauna thresholds for high-mod- low prospectivity habitat are not validated by links to fauna occurrence. Although it is likely that some habitat occurs beyond impact areas at Warramboo/ Highway/ Tod Bore/, the current information does not allow accurate assessment of how much will be retained following mining, or what is the likelihood that species known only inside pits will occur there.	Integrate current fauna occurrence records with three dimensional habitat modelling to: A) validate habitat prospectivity categories B) investigate habitat thickness at known occurrence records of different types of troglofauna C) provide a tool for estimating wider potential extent of habitat surrounding known occurrences of a species or an assemblage D) based on potential extent of habitat surrounding all known occurrences of an assemblage, estimate potential amount of habitat retained after mining.	The Proponent agrees with the suggested strategy. Current fauna occurrence records have been integrated with 3-dimensional habitat modelling as described in 6.4.1.3 and in the habitat modelling methodology contained in Appendix 7. Investigation of habitat thickness for known troglofauna records has been undertaken as described in Section 6.4.1.3. Analysis showed that troglofauna have been recorded in the Warramboo and Highway/Tod Bore area where Pisolite thickness is less than 5 m and in some areas where thickness is less than 2 m. The selection of 5 m Pisolite thickness as the threshold for medium prospectivity habitat is therefore considered conservative and provides one of the inputs to the troglofauna habitat assessment which is a tool for estimating the wider potential extent of habitat. The modelled extent of habitat that will remain after mining is provided in Section 6.4.3.1.
2.2.2A	Moderate	Design characteristics of the MEZ: A) 30 m buffer justification B) Justification for protection of a minimum of one known location of P1/2 species C) Issues with compliance monitoring.	A) Clarify justification of MEZ around modelled potential extent of habitat B) Add complexity to better describe current state of knowledge about MEZ effectiveness C) Re-examine compliance monitoring data to add justification of MEZ D) Improve scientific rigour of	The Proponent agrees with the suggested strategy. Additional information regarding troglofauna sampling and habitat monitoring in the Mesa A MEZ has been provided in Section 6.4.2. The data indicate that the Mesa A MEZ is functioning as intended and is providing habitat to maintain the biological diversity and ecological integrity of the subterranean fauna community. The volume of connected habitat retained on each mesa is likely to be a key parameter in determining the ongoing suitability of the retained habitat to support a viable troglofauna population.

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments
			future monitoring plans E) Engage with current and future research to help determine troglofauna minimum habitat requirements.	The designs of the MEZs at Mesas A, B and C, therefore, focussed on retention of at least 50% by volume of connected pre-mining habitat. Other considerations during the design of the MEZs included retention of habitat for single location and singleton troglofauna, heritage values and the geotechnical stability of the retained escarpments at closure. A 50 m minimum escarpment width has been included in the MEZ designs to ensure heritage values are retained and geotechnical stability requirements are more than met. An additional minimum 30 m escarpment width has been applied where the MEZ has been modified to include single location and/or singleton troglofauna records, resulting in an escarpment width of 80 m in some locations. Troglofauna sampling and monitoring of habitat parameters at Mesa A indicate that an escarpment width of 50 m as part of a significant volume of connected habitat is providing suitable troglofauna habitat.
				The MEZ designs aimed as far as practicable to retain at least one location where each troglobitic taxon has been recorded. This is consistent with the approach taken at Mesa A. Taxon originally recorded in only a limited number of locations have now been recorded in other locations in the Mesa A MEZ (Section 6.4.4.1)
				The Proponent has reviewed the troglofauna sampling and habitat monitoring conducted under the current Troglofauna Management Plan. Proposed improvements to sampling and monitoring to improve scientific rigour are discussed in Section 6.4.6.2 and further detailed in the Mesa A Hub draft EMP (Appendix 4).

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments
				The Proponent is actively involved in research projects that aim to improve troglofauna sampling methodologies and knowledge of troglofauna habitat requirements.
2.2.3A	Moderate	Logical flaw: "species [omitted] that were only ever recorded from the draft MEZ and thus never at risk of impact".	Remove or reword statement to avoid contradictions with other assumptions about species occurrence within MEZ. Check numbers of species included in assessment.	The Proponent agrees with the suggested strategy. All recorded troglomorphic taxa have been considered in the Environmental Impact Assessment regardless of whether they were recorded in the original draft MEZs or not (Section 6.4.1.4).
2.2.3B	Moderate	Perception issues with wording: Priority 1 (singletons found only inside pit), and Priority 2 (species known from multiple sites inside pit).	Change wording to avoid perceptions of Priority 1 and 2 species being treated differently.	The Proponent agrees with the suggested strategy. The wording referred to in the peer review was used to assist with internal classification of recorded troglomorphic taxa and is not used in the impact assessment or the ERD.
2.3A	Moderate	30 m minimum buffer issue as in 2.2.2A	See strategy 2.2.2A.	See response to 2.2.2A.
Baseline Troglofauna S	Survey Documents			
3.1.1A	Moderate	Baseline survey issues: A) sampling gaps between Mesas and in moderate to low prospectivity habitats B) Most samples taken from within impact areas (information available at the time of sampling) C) No overall / cumulative assessment of sampling inside/ outside impact areas or comparing different habitat units.	Assess any potential sampling gaps/ artefacts (flow-on effects to inferences regarding potential habitat extent and species occurrence).	The Proponent agrees with the suggested strategy. The Proponent acknowledges that troglofauna sampling between Mesas B and C would provide information about the connectivity and utilisation of the modelled medium and low prospectivity habitat in this area. A sampling program in this area is currently underway but sampling is limited by availability of drill holes and tenure and heritage constraints. Given the lack of sampling between Mesas B and C, the Proponent has taken a conservative approach and has designed the MEZs assuming there is no habitat connectivity between Mesas B and C (Section 6.4.1.3 and Section 6.4.3.1).

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments
				Troglofauna sampling has been conducted in both proposed impact and reference areas. A comparison of troglofauna capture rates for Mesas B and C with capture rates for the proposed respective MEZs is provided in Section 6.4.4.1. The data indicate that the proposed MEZs are representative of the mesa in terms of overall troglofauna utilisation. A comparison of the Order level assemblage present on Mesas B and C with the Order level assemblage present in their proposed respective MEZs is presented in Section 6.4.3.1 and discussed in Section 6.4.4.1. The data indicate that the proposed MEZs contain troglofauna assemblages that are representative at Order level of the assemblage in each mesa with all Orders present on each mesa recorded in the proposed MEZs except one Order at Mesa B and one Order at Mesa C. Sampling between Highway/Tod Bore and Dinner Camp Bore to the south-west is limited and results from the sampling programs may be affected by different sampling methodologies and seasonality. Additional troglofauna sampling is underway to further investigate habitat connectivity between the Highway/Tod Bore and Dinner Camp Bore areas. The Proponent acknowledges that sampling further outside proposed impact areas and in different habitat units would improve knowledge of troglofauna habitat requirements. The Proponent undertakes such sampling where possible but is constrained by availability of drill holes and tenure and heritage
				constraints.
3.1.2A	Moderate	Baseline habitat suitability categories used in baseline reports illogically applied and over simplistic.	Habitat assessment in the baseline studies is superseded by RTIO geological/ geomorphological	The Proponent agrees that the naming conventions applied to habitat categories in the baseline reports were unclear. The Proponent has addressed this issue in the ERD by removing the

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments
			habitat modelling. For areas where this modelling does not extend, baseline habitat assessment categories should be treated as preliminary and inconsistent with fauna information.	unclear nomenclature and delineating areas where there is high confidence in the habitat modelling. The prospectivity of habitat was assessed based on the physical characteristics of the formation providing suitable habitat features known to support troglofauna, for example the presence of cavities, vugs, interstitial spaces and hydrated/weathered zones. This assessment requires sufficient geological data, particularly from drill logs, to be available for each area to be assessed. The area to south of Mesa A (called 'Congo Bore') is an area where limited drill logs are available. Surface geological mapping was, therefore, used in conjunction with the limited drill hole data to assess troglofauna habitat prospectivity in this area. Use of surface geological data generated a low habitat prospectivity classification over the Congo Bore area as presented in Biota (2017a). As noted in Section 3.1.2A of the peer review, the records of troglofauna in this area do not support the low prospectivity classification. Further investigation has shown the habitat modelling in the Congo Bore area to be of low confidence (due to limited drill hole data and indications that surface geological mapping is not representative of the subsurface geology in this area). To more accurately depict the overall reliability of the modelling, the modelling outputs in some areas, including the Congo Bore area, were delineated as 'low confidence' habitat modelling. Evaluation of the modelling input and output data and delineation of low confidence areas in response to peer review item 3.1.2A resulted in the Environmental Impact Assessment presented in the ERD using only high confidence habitat modelling outputs.

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments
3.1.2B	Major	Baseline habitat assessment assumes high connectivity of Warramboo/ Highway/ Tod Bore and Dinner Camp Bore to the south-west, assumptions that are directly contradicted by fauna sampling information showing high species turnover between these areas.	See strategies 2.2.1A, 2.2.1B, and 3.1.1A.	The baseline habitat assessment indicates that there is habitat connectivity between Highway/Tod Bore and Dinner Camp Bore to the south-west. The assessment is based on drilling data and CID thickness modelling, neither of which indicate any faults or other structural features in the Highway/Tod Bore area that may result in discontinuity in habitat. However, limited sampling from the Dinner Camp Bore area did not record the strongly troglobitic order, Schizomida, which is represented in the broader Warramboo and Highway/Tod Bore area. The lack of records for this order may be due to ecological sampling effects (Biota 2017a) or may indicate a discontinuity in troglofauna habitat outside the Development Envelope. Additional troglofauna sampling is underway to further investigate habitat connectivity between the Highway/Tod Bore and Dinner Camp Bore areas.
3.1.2C	Moderate	Baseline habitat assessment in- between high suitability habitats based on less habitat data, untested by sampling (implications for assumptions of habitat discontinuity).	Assessment of habitat connectivity between mesas would benefit from additional sampling/ investigations, pending development of suitable holes. If this is not possible, strategy 2.2.1B may help to highlight potential connectivity for some species.	The Proponent agrees that troglofauna sampling between Mesas B and C would provide information about the connectivity of the modelled medium and low prospectivity habitat in this area. A sampling program in this area is currently underway but sampling is limited by availability of drill holes and tenure and heritage constraints. Given the lack of sampling between Mesas B and C, the Proponent has taken a conservative approach and has designed the MEZs assuming there is no habitat connectivity between Mesas B and C (Section 6.4.1.3 and Section 6.4.3.1).

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments
3.1.3A	Moderate	Inconsistencies in assessment of species ecological status, SRE status, potential distribution between or within baseline reports.	RTIO has advised all species assessments have been updated for the ERD based on cumulative/overall assessment of species ranges, superseding baseline assessments. All species in Table 3.2 should be considered Potential SRE troglobites.	The Proponent agrees that inconsistencies in the assessment of species are present between various sampling reports. The Proponent has addressed this issue in the ERD by considering the potential impacts on all recorded troglomorphic species regardless of whether they have previously been categorised as widespread or not. All species listed in Table 3.2 of the peer review report are, therefore, considered as potential SREs in the ERD (Section 6.4.1.4).
3.2A	Moderate	Baseline species accumulation studies considered unidentified specimens to represent additional species, potentially skewing results.	Reassess species accumulation analyses based on RTIO overall data, using a parsimonious approach to indeterminate or unidentifiable specimens (<i>i.e.</i> omit them). Provide more detail regarding data handling in estimates.	Species accumulation studies were undertaken as part of the baseline studies for the Mesa A/Warramboo Iron Ore Project and reported in Biota (2006c) and Biota (2007). The Proponent noted from those studies it was noted that the low capture rates for troglofauna result in the species accumulation curves appearing to reach an asymptote over several sampling periods until a new taxon is recorded with a resultant step change in the accumulation curve. Given the low capture rates inherent in current troglofauna sampling methods, the Proponent does not consider species accumulation curves to be a good measure of sampling adequacy. Species accumulation curves have, therefore, not been included in the ERD.
3.2B	Moderate	Baseline species accumulation studies inadequately described data handling methods and settings in Estimates used in the analysis.	See strategy 3.2A.	Estimates was used in baseline studies for the Mesa A/Warramboo Iron Ore Project and reported in Biota (2006c) and Biota (2007). Species accumulation curves have not been included in the ERD (refer to peer review number 3.2A), therefore, the methodology used is Biota (2006c) and Biota (2007) in relation to species accumulation curves is not relevant to the current impact assessment.

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments
3.3A	Moderate	It is difficult to reconcile results from previous studies with current survey results, due to the high number of reports and changes in nomenclature and subterranean/ SRE statuses.	RTIO has advised all species identifications and subterranean/ SRE statuses have been updated for the ERD based on cumulative/ overall assessment of species data, superseding previous baseline assessments.	The Proponent agrees that it is difficult to reconcile results from previous survey reports with those from current survey reports due to new taxonomic information and changes in nomenclature that become available after reports are completed. The Proponent manages this issue by maintaining a Geographical Information System database that contains all troglomorphic specimen records. This database is updated as taxonomic revisions and other data become available. The Proponent used this database with current information for all specimens to complete the Environmental Impact Assessment for the ERD.
Troglofauna Compliance	e Monitoring Docu	uments	,	
4.1.1A	Major	Compliance monitoring results unable to indicate whether and to what extent troglofauna assemblages at Mesa A have been affected by mining, due to inadequate species level identifications and comparisons with previous data only at taxonomic order level.	Current and future Troglofauna Management Plan's to require: A) All future compliance monitoring to identify all specimens to species level and undertake full comparisons with baseline sampling and monitoring. B) Consistent framework for nomenclature, reference collections for specimens and genetic sequences.	The Proponent agrees with the suggested strategy. For subterranean fauna groups where suitable expertise to identify specimens to species level exists (e.g. schizomids, pseudoscorpions), identifications have been undertaken consistently to species level during baseline sampling and throughout compliance monitoring for Mesa A. Insufficient expertise was available during the baseline studies to identify specimens from some groups to species level. As expertise and advances in molecular analysis have become available the Proponent has identified new specimens to species level and has attempted to align those with historical specimens. However, many of the original specimens have not been appropriately stored or are too old for successful molecular analysis. The Proponent has reviewed the troglofauna sampling and habitat monitoring conducted under the current Troglofauna

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments
				discussed in Section 6.4.6.2 and further detailed in the Mesa A Hub draft EMP (Appendix 4).
4.1.2A	Moderate	Previous recommendation to reduce compliance monitoring sampling rates not justified by sufficient evidence.	Current and future Troglofauna Management Plan's to require: C) consistent methods and sampling design, seasonality and trap duration etc. D) consideration in sampling design to development of thresholds/ indicators for detecting change in species/ assemblages.	The Proponent agrees with the suggested strategy. The Proponent has reviewed the troglofauna sampling and habitat monitoring conducted under the current Troglofauna Management Plan. Proposed improvements to sampling are discussed in Section 6.4.6.2 and include consistent methods and sampling design. Management targets for troglofauna are proposed in the Mesa A Hub draft EMP (Appendix 4).
4.2A	Moderate	Results of targeted sampling of waste dumps and pit floor limited by numbers of holes and extent of holes through multiple habitat zones.	Further investigations required to establish persistence of troglofauna species/ assemblages beneath pit floor and under waste dumps.	The Proponent agrees further targeted sampling of waste dumps and beneath pit floors is required to establish persistence of troglofauna species and assemblages in these areas. Troglofauna sampling beneath the pit floor and in waste dumps will continue at Mesas A and K but has not been included in the Mesa A Hub draft EMP as this sampling is dependent on the limited availability of and access to drill holes in the active mining area.
4.3A	Moderate	Downhole visual monitoring lacked assessment framework which could be used to validate results.	Either develop scientifically valid assessment framework for down hole visual survey, or pursue alternative methods for physical habitat monitoring.	The down hole optical imagery reports (as provided for the peer review) contain limited examples of the imagery that has been recorded. Additional high quality imagery, such as that shown in Section 6.4.2.2 is available for each hole logged but was not provided, or requested, as part of the peer review. The use of optical imagery was intended to provide a visual record of down hole cavities and voids over time that would

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments	
				allow qualitative assessment of changes in the subterranean environment and assist with visualisation and understanding of the subterranean environment. The types of changes the optical image surveys were to assess were collapse of cavities and generation of new fractures. As discussed in Section 6.4.6.2, very few changes to cavities	
				have been noted since annual collection of optical imagery commenced in 2010. No changes of the magnitude of cavity collapse or generation of new fractures have been recorded, no have any impacts that could be attributed to mining operations been detected. It is, therefore, considered that additional monitoring would be unlikely to provide any further insight into potential impacts. Further optical imagery surveys have, therefore, not been included in the draft Mesa A Hub Environmental Management Plan.	
4.4A	Moderate	Ability to compare current MEZ conditions to baseline habitat conditions constrained by lack of suitable baseline data and issues with environmental probes.	Design a statistically valid troglofauna habitat monitoring program, using more suitable probes, for Mesas B, C, and Warramboo, and begin collecting baseline data without delay to capture full range of seasonal variability.	The temperature and humidity monitoring program conducted as part of the Mesa A Troglofauna Management Plan was designed to allow comparison and analysis of: 1. pre-mining data with data collected during mining 2. data collected from the Mesa A MEZ with data collected from reference sites 3. data collected near the pit face in the Mesa A MEZ with data collected further from the pit face.	

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments
				The Proponent agrees that collection of baseline data should commence as early as possible and has, therefore, already commenced collection of baseline temperature and humidity data at Mesa B. Mesas of the Robe Valley, including Mesas A, B and C were formed through the same broad depositional processes and therefore comprise the same geological units with similar stratigraphy (Section 6.4.2). Given the similarity between the mesas it is considered that down hole temperature and humidity data collected at Mesas A, B, F and K will provide data that can be applied to management of troglofauna habitat at other mesas. The Proponent, therefore, does not consider that establishment of separate baseline monitoring at Mesa C is warranted.
				The objective for collection and analysis of down hole temperature and humidity data is to assess whether an exposed pit face results in changes in the temperature and humidity in the subterranean environment. This was considered to be pertinent to the mesa formation due to the limited lateral extent of the troglofauna habitat. Monitoring results show proximity to the Mesa A pit edge did not influence mean down hole temperature or humidity (Astron 2017b) (Section 6.4.2). Core troglofauna habitat at Warramboo consists of the buried downstream continuation of the Robe Pisolite deposit present at Mesas A, B and C. As such, the troglofauna habitat at Warramboo is less exposed to potential changes in subterranean temperature and humidity. The Proponent, therefore, does not consider that establishment of separate baseline monitoring at Warramboo is warranted.

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments			
Baseline Stygofauna S	Baseline Stygofauna Survey Documents						
5.1A	Moderate	Stygofauna sampling uneven inside/ outside predicted drawdown and across putative habitat types. May have had an effect on sampling artefacts.	Undertake deeper analysis of sampling and fauna results to investigate whether the current data is affected by sampling artefacts or if species/ assemblage occurrence patterns concur with inferred habitat extent and connectivity.	Stygofauna sampling is limited to available water bores in the area. There are limited water bores available for sampling in the northern and western extents of the modelled cone of depression. Hydrogeological test work and modelling indicate that the extensive Yarraloola Aquifer is well connected between the centre of the cone of depression at Warramboo to the north and west of the modelled extent of impact.			
5.2A	Moderate	Stygofauna habitat characterisation over-simplified and lacking validation by species assemblage comparisons (similar to issue 2.2.1A for troglofauna).	More detailed mapping and assessment of stygofauna habitat extent, suitability and connectivity, integrated with fauna occurrence records may improve the assessment (similar to strategy 2.2.1B for troglofauna).	The Proponent agrees that the preliminary stygofauna habitat characterisation was over-simplified. Biota (2017d) considered stygofauna habitat prospectivity across the Robe Valley area based mainly on geological data. At this coarse modelling level a relatively high number of specimens were recorded from areas that were categorised as 'low prospectivity' (Figure 5.8 of Biota (2017d)). However, the majority of the areas categorised as 'low prospectivity' where specimens were collected, were areas where limited drill logs and hydrogeological data were available (i.e. away from areas where the Proponent has undertaken resource evaluation and hydrogeological drilling). The stygofauna habitat modelling output presented in the ERD is at a finer scale than that presented in Biota (2017d) and is based on much greater drill hole data coverage in the vicinity of the western portion of the Development Envelope than is available for the Robe Valley as a whole. The ERD also includes greater consideration of the hydrogeology of the aquifers (that is, stygofauna habitat), rather than focusing on the			

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Peer review number	Classification	Issue	Strategy	ERD section and/or proponent comments
				in the ERD for the western portion of the Development Envelope is of a higher confidence level than the broader scale output for the Robe Valley and the correlation between the habitat prospectivity categorisation and the specimen records is much higher (Figure 6-33 of the ERD).
5.2B	Moderate	Habitat connectivity assessment for Mesa C/Robe River Aquifer at odds with occurrence of shared stygofauna species.	Species assessment in the baselines studies is superseded by RTIO overall assessment for ERD. More detailed mapping and assessment of stygofauna habitat extent, suitability and connectivity, integrated with fauna occurrence records may improve the assessment (similar to strategy 2.2.1B for troglofauna).	The Proponent agrees that the preliminary habitat assessment for Mesa C was unclear. The Proponent has addressed this issue in the ERD by removing the unclear nomenclature and considering the hydrogeology of the aquifer, rather than just the geology of the area (Section 6.5.1.2).
5.2C	Moderate	Stygofauna habitat suitability categories illogically applied and over simplistic (similar to issue 3.1.2A for troglofauna).	More detailed mapping and assessment of stygofauna habitat extent, suitability and connectivity, integrated with fauna occurrence records may improve the assessment (similar to strategy 2.2.1B for troglofauna).	The Proponent agrees that the naming conventions applied to habitat categories in the baseline reports were unclear. The Proponent has addressed this issue in the ERD by removing the unclear nomenclature and considering the hydrogeology of the aquifer, rather than just the geology of the area (Section 6.5.1.2).

¹ This 33 ha refers to the troglofauna habitat that would be removed by the proposed additional mining.

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6.7 Predicted Outcome

The key Subterranean Fauna values identified in the Development Envelopment that are considered relevant to the Proposed Change are:

Significant troglofauna habitat

- The Priority 1 PEC, the Subterranean invertebrate community of mesas in the Robe Valley region, occurs at Mesas B and C
- The Priority 1 PEC, the Subterranean invertebrate community of pisolitic hills in the Pilbara.

Troglofauna taxa

- Conservation significant troglofauna species:
 - o Paradraculoides anachoretus
 - o Paradraculoides bythius
 - o Ideoblothrus linnaei
 - o Ideoblothrus sp. 'Mesa A'
 - o Lagynochthonius asema
 - o Tyrannochthonius sp. 1
- · Confirmed SRE troglofauna species:
 - o Ideoblothrus pisolitus
 - o Ideoblothrus sp. 'Mesa A1'
 - o Ideoblothrus sp. 'Mesa A2'
- Potential SRE troglofauna taxa.

Stygofauna taxa

- Conservation significant stygofauna species: Nedsia hurlberti
- Potential SRE stygofauna taxa.

The key predicted outcomes for the Subterranean Fauna values outlined above are:

- Disturbance to troglofauna habitat on Mesas A, B and C as a result of the Proposed Change will be limited to 50% by volume of connected pre-mining habitat
- Biological diversity and ecological integrity of the troglofauna communities are expected to be maintained given:
 - the small proportion of additional habitat that will be impacted at Mesa A, retention of a significant volume of connected habitat and the evidence that the Mesa A MEZ is functioning as intended
 - retention of significant volumes of connected habitat at Mesas B and C and the evidence that the Mesa A MEZ is functioning as intended
 - the small proportion of habitat that will be impacted at Warramboo and the extent of habitat outside the proposed impact area
 - given the availability of modelled high and medium habitat around the Highway/Tod Bore area and given the Proponent's commitment to further investigate habitat connectivity between the Highway/Tod Bore and Dinner Camp Bore areas

- Biological diversity and ecological integrity of the stygofauna communities are expected to be maintained given:
 - the small proportion of available stygofauna habitat that will be impacted by the proposed groundwater drawdown and pit excavation at Warramboo
 - stygofauna habitat will continue to be available within the proposed borefield extension area at Warramboo and outside the impact area both during and after mining operations
 - the widespread nature of most taxa and the lack of potential barriers to the west and north of the proposed borefield extension area at Warramboo
 - the small proportion of available stygofauna habitat represented by the Mesa C CID Aquifer and the evidence indicating connection of the Mesa C Aquifer with the adjacent, extensive high prospectivity habitat of the Robe River Alluvial Aquifer which is not expected to be impacted by the Proposed Change.

After the mitigation hierarchy has been applied (Table 6-22 and Table 6-28), including retention of connected habitat through designation of a MEZ, and consideration of extensive, connected stygofauna habitat at Warramboo and Mesa C, the Proponent considers that the residual impact associated with the unavoidable clearing of the Priority 1 PECs, the Subterranean invertebrate community of mesas in the Robe Valley region and the Subterranean invertebrate community of pisolitic hills in the Pilbara is significant and warrants an offset. The proposed offset is discussed in Section 13.

Given the proposed mitigation and offset, the Proponent considers that the Proposed Change can be managed to meet the EPA's objective for Subterranean Fauna.

7. TERRESTRIAL FAUNA

This section describes the terrestrial fauna that occur within the western portion of the Development Envelope and provides an assessment of the potential impacts of the Proposed Change to terrestrial fauna values, proposed mitigation measures and the predicted outcome for this key environmental factor.

7.1 EPA Objective

The EPA's objective for terrestrial fauna is to protect terrestrial fauna so that biological diversity and ecological integrity are maintained.

7.2 Policy and Guidance

The following policy and guidance documents have been considered in the assessment of terrestrial fauna.

7.2.1 EPA policy and guidance

- DMP and EPA Guidelines for Preparing Mine Closure Plans (DMP and EPA 2015)
- Environmental Factor Guideline: Terrestrial Fauna (EPA 2016j)
- Statement of Environmental Principles, Factors and Objectives (EPA 2018a)
- Technical Guidance: Sampling methods for terrestrial vertebrate fauna (the
 content in this Technical Guidance has not yet been updated from the technical
 report of the EPA and the then Department of Environment and Conservation
 issued in September 2010 and titled 'Technical Guide Terrestrial Vertebrate
 Fauna Surveys for Environmental Impact Assessment') (EPA 2016k)
- Technical Guidance: Terrestrial Fauna Surveys (the content in this Technical Guidance has not yet been updated from EPA Guidance Statement No. 56 issued in June 2004) (EPA 2016l)
- Technical Guidance: Sampling of short range endemic invertebrate fauna (the content in this Technical Guidance has not yet been updated from EPA Guidance Statement No. 20 issued in May 2009) (EPA 2016m)
- Environmental Factor Guideline: Inland Waters Environmental Quality (EPA 2016c)
- Instructions on how to prepare an Environmental Review Document (EPA 2016)
- Instruction of how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (EPA 2016e).

7.2.2 Other policy and guidance

- WA Environmental Offsets Policy (Government of Western Australia 2011)
- WA Environmental Offsets Guidelines (Government of Western Australia 2014)
- Survey guidelines for Australia's threatened Bats (Department of the Environment, Water, Heritage and the Arts [DEWHA] 2010)
- Survey guidelines for Australia's threatened mammals (Department of Sustainability, Environment, Water, Population and Communities [DSEWPaC] 2011a)
- Survey guidelines for Australia's threatened reptiles (DSEWPaC 2011b)
- Australian Water Quality Guidelines for Fresh and Marine Waters (ANZECC and Agriculture and Resource Management Council of Australia and New Zealand 2000).

7.3 Environmental Scoping Document

Table 7-1 summarises where the requirements of the ESD are addressed in this section.

Table 7-1: Requirements of ESD for terrestrial fauna

Task number	Requirement	Comments
31	Provide a desktop review and analysis of all surveys of the Proposal area undertaken in accordance with EPA Policy and Assessment, Survey guidelines for Australia's threatened mammals. EPBC Act survey guidelines 6.5 (DSEWPaC 2011a), Survey Guidelines for Australia's Threatened Bats. EPBC Act survey guidelines 6.1 (DEWHA 2010) and Survey Guidelines for Australia's threatened reptiles. EPBC Act survey guidelines 6.6 (DSEWPaC 2011b).	Section 7.4
32	The study should include: Justification of how these surveys are relevant and representative of the Development Envelope and if they were carried out using methods consistent with EPA Policy; and A comprehensive listing of vertebrate fauna and short range endemic (SRE) invertebrate fauna known or likely to occur in the habitats present, and identification of conservation significant fauna species likely to occur in the area.	Section 7.4
33	Conduct Level 2 terrestrial fauna and SRE invertebrate surveys in areas that are likely to be directly or indirectly impacted as a result of the Proposal. Surveys are to be undertaken in accordance with EPA Policy and, where available, species-specific survey guidelines for relevant species listed under the <i>Wildlife Conservation Act 1950</i> and the <i>Environment Protection and Biodiversity Conservation Act 1999</i> .	Section 7.4.1
34	Conduct additional targeted surveys for conservation significant fauna that are known to or likely to occupy habitats in the project area if demonstrated to be required based on the results of the desktop study and Level 2 surveys.	Section 7.4.1
35	Specify any MNES being assessed as part of the accredited assessment.	Section 12.3
36	Provide a review of bat populations and habitat in the local and regional area including the existing Mesa A Hub Proposal.	Sections 7.4.3
37	Investigate and provide a description of any potential bat populations and habitat in the Mesa A Hub Revised Proposal area, and potential impacts from the Mesa A Hub Revised Proposal.	Sections 7.4.3

Task number	Requirement	Comments
38	For each relevant conservation significant species, including bat species and SREs, identified as likely to occur within the Proposal area, include:	
	 Baseline information on distribution (including known occurrences), ecology and habitat preferences at both the site and regional levels 	Section 7.4
	Information on the conservation value of each habitat type from a local and regional perspective, including the percentage representation of each habitat type on site in relation to its local and regional context	Section 7.4.3 and 7.5.1
	Size and importance of the population from a local and regional perspective and potential percentage loss of the conservation significant species locally due to loss of habitat	Sections 7.4, 7.5 and 7.6 A qualitative assessment of the size and importance of fauna populations has been provided where possible and the potential percentage loss of habitat has been estimated. The size and importance of populations regionally has been discussed qualitatively using the available information.
	Maps illustrating the known recorded locations of conservation significant species and SRE invertebrates in relation to fauna habitat and the proposed disturbance and areas to be impacted	Figure 7-4, Figure 7-5 and Figure 7-6
	For Bats	
	 Provide evidence for the assertion made in the referral that bats can be expected to safely move from one cave to another if a cave is disturbed by construction or operational activities 	Section 7.6.4
	Detail the extent to which clearing will remove foraging/hunting habitat for these species and the likely impacts of this on the local population	Section 7.6.3, 7.6.4 and 7.6.1.1
	 The extent to which attraction to light sources will impact these species and what might be done to mitigate this. 	Section 7.6.3 and 7.6.4

Task number	Requirement	Comments
	For Northern Quoll:	
	The extent to which clearing will remove hunting habitat and impact the species	Section 7.6.2
	Explanation of how the construction of cuttings will avoid harm to the species.	Section 7.6.2
	For Pilbara Olive Python:	
	The extent to which changes in surface water availability and quality can be expected to impact this species.	Sections 7.6.5, 8.6.3.4 and Table 12-5.
39	Identify the fauna habitat types within and outside the areas of impact. Consider habitat types that provide important ecological function within the Proposal area (e.g. geological features which may support unique ecosystems).	Section 7.4.3
40	Discuss known existing threats to the species, with reference to relevant impacts from the proposed action (including taking into consideration any relevant guidelines, policies, plans and statutory provisions).	Section 7.5
41	Provide a detailed description of the potential direct, indirect (including downstream) and cumulative impacts to conservation significant and other species within the Proposal area and on a regional scale.	Section 7.6
42	Develop a Fauna Management Plan to apply to the entire Mesa A Hub Revised Proposal. The following should be addressed in the plan: • Monitoring of the health and population sizes of threatened species, in particular the following species (all of which are MNES): • Ghost Bat (<i>Macroderma gigas</i> – Vulnerable) • Pilbara Olive Python (<i>Liasis olivaceus barroni</i> – Vulnerable) • Pilbara Leaf-nosed Bat (<i>Rhinonicteris aurantia</i> – Vulnerable) • Northern Quoll (<i>Dasyurus hallucatus</i> – Endangered).	Appendix 4 The draft EMP includes monitoring programs for the Ghost Bat and the Northern Quoll as these are the species with the greatest potential to be impacted by the Proposed Change. No significant impacts to high value habitat for the Pilbara Olive Python or the Pilbara Leafnosed Bat are anticipated as a result of the Proposed Change. Monitoring is, therefore, not considered warranted for these species.

Task number	Requirement	Comments
	Management options to be triggered should monitoring show a decline in health or population sizes of threatened species as a result of implementing the proposal	Appendix 4 and Section 7.8
	Retention of critical habitat where possible, and where not possible justification/explanation is required.	Sections 7.6, 7.8 and 12
43	Demonstrate application of the mitigation hierarchy to avoid and minimise impacts to terrestrial fauna	Section 7.6, 7.7, 7.8 and 12
44	The Proponent should demonstrate that the proposed action is not inconsistent with any relevant policy and guidance, relevant recovery plan and threat abatement plan.	Section 7.6, 7.7, 7.8 and 12
45	Prepare a Mine Closure Plan consistent with DMP and EPA Guidelines for Preparing Mine Closure Plans (2015), which addresses the need for progressive rehabilitation of habitat for conservation significant species.	Appendix 3
46	Describe the residual impacts for the Proposal and analyse these impacts to identify and detail any that are significant.	Section 7.6, 7.8 and 12
47	Create an offsets position following application of the mitigation hierarchy.	Section 7.8 and 13
48	Demonstrate and document in the ERD how the EPA's objective for this factor can be met.	Section 7.6, 7.7, 7.8 and 12

7.4 Receiving Environment

7.4.1 Terrestrial fauna studies

Terrestrial fauna surveys have been undertaken in the Robe Valley area since 1991, covering an area in excess of 72,400 ha. The combined coverage of these surveys provides a considerable knowledge base of the terrestrial fauna present in the western portion of the Development Envelope. Terrestrial fauna surveys have also been undertaken for the approved activities. Table 7-2 summarises the key terrestrial fauna surveys relevant to the Proposed Change.

Survey locations within the Development Envelope are shown on Figure 7-1 and Figure 7-2 and the most recent survey reports are provided in Appendix 8. Figure A8-1 is also provided in Appendix 8 showing the fauna sampling locations in relation to fauna habitat.

Table 7-2: Summary of supporting terrestrial fauna studies

Report	Summary	Survey date
Warramboo borefield Level 2 Fauna Assessment May 2017 Astron Environmental Services (Astron) (2018a)	A dual phase Level 2 vertebrate and Short Range Endemic invertebrate fauna assessment of the Warramboo area covering 4,619 ha was conducted in accordance with EPA policy and guidelines and aligned to requirements of Commonwealth guidelines. The survey included a desktop assessment and field survey including identification of habitat types, trapping, avifauna surveys, use of motion sensor cameras, acoustic bat surveys to detect the presence of Ghost Bat	May and September 2017
(20104)	and Pilbara Leaf-nosed Bat, active searches, targeted searches and nocturnal spotlighting.	
Mesa A Hub – Targeted Night Parrot Fauna Assessment, September 2017 Astron Environmental Services (2018b)	A targeted Night Parrot fauna survey was undertaken within the western portion of the Development Envelope including a desktop literature review, systematic field survey to verify the results of the desktop study and previous Night Parrot records and to record potential Night Parrot observations or records and assess the potential for the survey area to support a resident population of this species. Astron conducted four fauna habitat assessments within the survey area in habitats prospective for Night	September 2017
	Parrot occurrence. The fauna habitat assessments occurred in the best habitat available for this species in the survey area. Fauna habitat assessment is currently the most proficient survey method for describing the habitat for this highly cryptic species and determining likely occurrence of this species.	
Robe Valley Mesas A and C, Ghost Bat roost cave assessment, April 2017 Bat Call WA (2017a)	A targeted assessment of bat conservation values of three caves at Mesas A and C. The purpose of this survey was to assess the conservation values of three caves potentially associated with Ghost bats at Mesas A and C that had been previously identified by environmental surveys and internal Rio Tinto heritage and fauna assessments. This involved a visual assessment of cave geometry and environments and a search for Ghost Bat presence, including roosting bats and/or middens.	April 2017
Mesa B and C Ghost Bat roost cave assessment Bat Call WA (2016)	An assessment of bat conservation values of caves at Mesa B and Mesa C. The assessment included a visual assessment of cave environments for suitability for Ghost Bat and Pilbara Leaf-nosed Bat, along with searches for the presence of Ghost Bat individuals. The study included the perimeters of both Mesas B and C and the surrounding outwash areas immediately adjacent to the mesas.	July 2016

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Report	Summary	Survey date
Level 2 Terrestrial Fauna Surveys: Mesa B-C, Warramboo BWT and Highway to Tod Bore MWH (2015a)	A Level 2 terrestrial fauna survey across the Mesa B, C, Warramboo BWT mine area and Highway to Tod Bore mine areas. The survey was conducted in accordance with EPA policy and guidelines and aligned to the requirements of Commonwealth guidelines. The survey included systematic, targeted and opportunistic sampling of terrestrial vertebrate fauna (mammals, birds, reptiles and amphibians) and potential SRE invertebrate fauna.	May and September 2015
Mesa Façade Assessment – Mesas B and C MWH (2015b)	An assessment to categorise, rank and map the ecological quality of the façades of Mesas B and C. The assessment included a desktop study and field survey to rate the ecological value of, and existing disturbance to, each site and delineate sections of the mesa façades (referred to as escarpments throughout this document) based on these ratings. Both mesas were inspected either via access tracks around the base of the mesas, or from drilling tracks on the mesa plateaus and rated according to quality of habitat for significant flora and fauna.	May 2015
Robe Valley Mesas Fauna Report Biota (2011c)	A single-phase Level 2 survey of a study area encompassing Mesas B, C, D, E, F, H and I to identify and assess fauna assemblages and habitats present in the study area including vertebrate fauna, bats, avifauna and potential SRE species.	October 2010
Fauna Habitats and Fauna Assemblage of the Mesa A Transport Corridor and Warramboo Biota (2006d)	A three stage survey of fauna and fauna habitats in the Mesa A Transport Corridor and Warramboo, including searches for vertebrate fauna, bats, avifauna and invertebrates.	March to August 2005
Fauna Habitats and Fauna Assemblage of Mesa A and G, near Pannawonica Biota (2005b)	A survey of fauna habitats and fauna assemblages within a study area encompassing Mesa A and Mesa G conducted. The survey included searches for vertebrate fauna, bats, avifauna and invertebrates.	May 2004
Mesa A/Warramboo Project Baseline Aquatic Ecosystem Survey Wet Season Sampling 2016 WRM (2016)	A baseline sampling program for aquatic ecosystems in Warramboo Creek upstream and downstream of the proposed Warramboo BWT development. The program documented current ecological condition, including the presence of any aquatic fauna of conservation and/or regional significance.	May 2016

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Report	Summary	Survey date
Mesa B and C Project Baseline Aquatic Ecosystem Survey Wet Season Sampling 2016 WRM (2017)	A baseline sampling program for aquatic ecosystems of the Robe River undertaken on the Robe River and Mungarathoona Creek in the vicinity of Mesas B and C as well as further upstream and downstream. The program documented current ecological condition of these aquatic ecosystems (encompassing surface water chemistry and aquatic faunal assemblages).	May 2016
Warramboo Project: Baseline Aquatic Ecosystem Survey Wet Season Sampling 2018 WRM (2018)	A baseline sampling program for aquatic ecosystems in Warramboo Creek upstream and downstream of the Warramboo BWT development. The aim of the sampling program was to document current ecological condition, including the presence of any aquatic fauna of conservation and/or regional significance, and provide a benchmark against which any future effects of the Warramboo Mine may be assessed. The wet season sampling in April 2018 constitutes the second sampling event as part of establishing a baseline dataset, with previous sampling undertaken in the wet season of 2016 (WRM 2016).	April 2018

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