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25th February 2021

Technical Review - Mt Weld Rare Earths Project: Detailed Flora and Vegetation Survey

Mt Weld Mining Pty Ltd, a subsidiary of Lynas Corporation Ltd, commissioned Stantec Australia Pty Ltd (Stantec), to undertake a two-phase detailed flora and vegetation survey within tenements associated with, and adjacent to the Mt Weld mine site. The intent of the survey was to inform proposed applications to the Environmental Protection Authority to modify approved limits on disturbance areas and development envelopes prescribed in Ministerial Statement 476. More specifically, Lynas will be seeking to undertake an additional 499 ha of disturbance.

A preliminary technical review following completion of the phase 1 survey was undertaken on the 17th June 2020 by Mr Geoff Cockerton of Western Botanical. The review identified dry seasonal conditions as being a significant limitation, "leading to a high proportion of flora not being able to be identified". Otherwise, the review focused on a summary of the results, some taxonomic issues, and a few minor grammatical errors.

A second technical review following completion of the phase 2 survey was undertaken on the 26th of November 2020 by Dr Darren Brearley of Onshore Environmental. The review was made against the latest technical guidance for flora and vegetation for environmental impact assessment (EPA 2016), and identified a number of potential issues related to:

- dry seasonal conditions over both phases of the survey resulting in high numbers of collections not able to be identified to species level, the annual and ephemeral flora component being under-sampled (including absence of the previously recorded Priority 3 flora taxon *Goodenia lyrata*);
- the inclusion of records from unbounded releve sites assessed during historical reconnaissance surveys, with data from bounded quadrats assessed during the detailed two phase 2020 survey (and associated inconsistencies in the database); and
- species accumulation curve did not reach asymptote, suggesting that the study area had been under-sampled.

On the 8th of December 2020, Stantec provided a written response to 28 of the potential issues raised by Onshore Environmental during the November 2020 technical review. There was agreement to amend eight of the potential issues raised.

A teleconference with Mr Adam Cargill (Lynas), Mr Peter Jansen (KASA Consulting), Mr Daniel Roocke (Stantec) and Dr Darren Brearley (Onshore Environmental) was subsequently held on the 13th of January 2021 to further discuss outstanding potential issues identified during the technical review that had not been amended by Stantec. Immediately following the teleconference, Onshore Environmental emailed a list of five recommended actions to address specific outstanding review comments. On the 23rd of January 2021 this list was formally provided as an excel spreadsheet.

On the 19th of February 2021 Onshore Environmental rece<mark>ived the updated (version 3) detailed flora</mark> and vegetation survey report (Stantec 2021), along with the excel spreadsheet detailing how all five recommendations had been addressed. A review of the version 3 report was completed on the 24th of February 2021, which did not result in any further recommended amendments.

In the opinion of Dr Darren Brearley, the version 3 report is compliant with the EPA technical guidance for flora and vegetation surveys (EPA 2016). It is noted that survey timing for both phases of the 2020 field survey were undertaken under poor seasonal conditions contributed by low monthly rainfall during 2019 and 2020 for the Laverton area.

References

EPA, Environmental Protection Authority. (2016) Technical Guidance - Flora and Vegetation Surveys for Environmental Impact Assessment Environmental Protection Authority, Western Australia.

Stantec, A. (2021) Mt Weld Rare Earths Project: Detailed Flora and Vegetation Survey - Phase 2. Prepared for Lynas Corporation Ltd, February 2021.

Yours sincerely

Dr Darren Brearley

Director & Principal Botanist

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