

MARDIE SALT AND POTASH PROJECT

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

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Table of Contents

- 1. Purpose 1**
- 2. Responsibility 1**
- 3. Definitions 2**
- 4. Environmental Policy 3**
- 5. Environmental Objectives 3**
 - 5.1 Key Performance Indicators 3
- 6. Overall Project Activity Description 4**
- 7. Risk Management 4**
- 8. Training and Competency 4**
 - 8.1 Induction Training 5
 - 8.2 Task specific Environmental Training with Competency Assessment 5
 - 8.3 Environmental Awareness Training 6
 - 8.4 Environmental Qualifications 6
- 9. Communication 6**
 - 9.1.1 External Communication 7
- 10. Construction Environmental Management Plans 7**
 - 10.1 Ground Disturbance 8
 - 10.2 Fauna 10
 - 10.3 Erosion and Sediment Control 13
 - 10.4 Acid Sulphate Soils 16
 - 10.5 Waste 17
 - 10.6 Hydrocarbons, Chemicals and Brine 19
 - 10.7 Weeds – Mesquite 22
 - 10.8 Weeds – General 25
 - 10.9 Heritage 26
- 11. Conditional Environmental Management Plans 27**
- 12. Emergency Management 28**
- 13. Incident reporting and Investigation 28**
 - 13.1 Notifiable Incidents 28
 - 13.2 Incident Investigation 28
 - 13.3 Lessons Learnt 29
- 14. Monitoring & Corrective Action 29**
 - 14.1 Audit & Inspection 29
 - 14.1.1 Contractor Audits 30
 - 14.2 Environmental Non-Compliance 30
 - 14.3 Environmental Complaints 30
 - 14.4 Environmental Breach 30
 - 14.5 Reporting 30

15. References..... 31

16. Appendices..... 32

List of Tables

Table 1 Roles and Responsibilities1

Table 2 Definitions.....2

Table 3 Key Performance Indicators3

Table 4 Project Activities4

Table 5 Environmental Training Matrix.....5

Table 6 Environmental Management Strategy for Vegetation Clearing8

Table 7 Environmental Management Strategy for Fauna 10

Table 8 Environmental Management Strategy for Erosion and Sediment Control 13

Table 9 Environmental Management Strategy for Acid Sulphate Soils 16

Table 10 Environmental Management Strategy for Waste..... 17

Table 11 Environmental Management Strategy for Hydrocarbons and Chemicals..... 19

Table 12 Environmental Management Strategy for Mesquite. 22

Table 13 Environmental Management Strategy for Weeds..... 25

Table 14 Heritage Management Strategy 26

Table 15 Incident Investigation Team 29

1. PURPOSE

The purpose of this Construction Environmental Management Plan (CEMP) is to provide the framework for the management of environmental aspects and impacts during the course of the construction of works for the BCI Minerals Limited (the “Company”) Mardie Salt and Potash Project.

This CEMP is to ensure the Company's environmental obligations, including Licence To Operate, are met at all times and by all parties operating on the premises during construction. It provides an overview environmental controls that will be implemented for all identified environmental impacts and sets out conditions under which the Project will proceed.

2. RESPONSIBILITY

All Project key team members shall ensure that the environmental requirements of the Project are complied with. The responsibilities of the key team members and other key project personnel are summarised in Table 1.

Table 1 Roles and Responsibilities

Role	Responsibility
Construction Manager	<ul style="list-style-type: none"> • Ensure works proceed with all necessary environmental approvals, permits in place and in compliance with all applicable legal requirements. • Ensure all project personnel receive environmental inductions and training. • Ensure that all site personnel and contractors are aware of their responsibilities. • Ensure personnel assigned to perform tasks that may impact the environment are competent to do so or are under the direct control of a competent person.
Supervisor / Package Engineer	<ul style="list-style-type: none"> • Ensure that any changes to the schedule of works or work methodology, in particular changes under an approved GDP, are communicated to the Environmental Advisor in a timely manner. • Report all environmental events to the Environmental Advisor or Construction Manager. • Action an appropriate response in accordance with environmental procedures in the event of an environmental incident. • Assist the Environmental Advisor in promoting environmental awareness.
Manager Environment	<ul style="list-style-type: none"> • Determine CEMP implementation and compliance with Licence to Operate conditions
Environmental Advisor	<ul style="list-style-type: none"> • Assist the BCI Manager Environment in determining CEMP implementation and compliance with Licence to Operate conditions. • Ensure the Contractor requirements to the environmental management of works under contract is understood. • Confirm that all necessary environmental controls are implemented and maintained for the duration of the project. • Provide regular environmental progress reports to the Project Manager or delegated other. • On a periodic basis, monitor environmental compliance and supervise high-risk environmental activities when appropriate.

Role	Responsibility
	<ul style="list-style-type: none"> • Can be contacted when required or if unavailable has delegated authority. • Participate in project meetings if requested. • Promote environmental awareness throughout the course of the Project. • Complete and maintain all necessary environmental documentation for the Project, if appropriate. • Report all environmental incidents in a timely manner and assist in investigations as required. Facilitate corrective action as appropriate. Ensure complaints and near misses are documented and managed appropriately. • Ensure any outstanding environmental issues are resolved prior to project completion.
Contractors Employees and Subcontractors	<ul style="list-style-type: none"> • Adhere to the directives of this CEMP and the BCI's Management System and approved Project Environmental Management Plans and procedures. • Act in an environmentally responsible manner. • Report incidents to their supervisors as soon as practicable. • Satisfactorily perform all environmental works as specified by contractual arrangement or recognised authority. • Participate in subsequent investigations and implementation of preventive and corrective action(s) as required. • Attend all required environmental awareness, induction and training sessions. • Recognise the authority of the on-site environmental representative, particularly in the event of an actual or perceived environmental non-conformance, or when remedial action is indicated.

The organization structure will be outlined in the Project Execution Plan (MAR-0000-PM-PEP-EGM-020-0001).

3. DEFINITIONS

Table 2 Definitions

Term	Definition
CEMP	Construction Environmental Management Plan
Company	BCI Minerals Limited
EC	Electrical conductivity
EP Act	Environmental Protection Act
ERD	Environmental Review Document
ESD	Environmental Scoping Document
ESMS	Environment and Social Management System
GLpa	Gigalitres per annum
Ha	Hectare
KPI	Key Performance Indicator
PMC	The Project Management Consultant for this Project is Engenium Pty Ltd

4. ENVIRONMENTAL POLICY

The Company’s Environment and Community policy demonstrates commitment by leadership to the management and continuous improvement of environmental management including complying with applicable laws. This Environment and Community Policy (BCI-ENV-POL-001) shall be displayed on health and safety noticeboards.

5. ENVIRONMENTAL OBJECTIVES

The objective of this CEMP is to provide a framework to.

- take all practicable steps to prevent environmental and cultural heritage incidents in construction activities;
- ensure compliance with applicable environmental requirements as identified in the LTO Register;
- develop, implement and maintain an effective and efficient environmental management system;
- increase environmental and cultural awareness amongst all personnel; and
- support the continual improvement of environmental performance.

5.1 Key Performance Indicators

Table 3 Key Performance Indicators

Indicator	Monitoring Mechanism	Target
Ground Disturbance Permit Breach	INX Event Reporting	0
Significant ENV events	Significant events INX Event Reporting	0
Segregation, removal and disposal of rubbish to appropriate waste stream Scrap materials, redundant electrical equipment, packaging from equipment and materials.	Waste Management procedure Correct waste stream segregation Records of disposal	100%
Spill Management	INX Event Reporting	No spills > 200 litres
Dust Management	Provide effective control of all dust and windborne material emanating from site works by use of ground and road watering Daily timesheets and record keeping	As necessary
Weed Management	Weed Inspection Report per vehicle	100% Vehicles Inspected
Environmental Audits (annual)	Audits Completed	Minimum 95% completed
Incident Investigations	INX Event Reporting	Closed within 28 days
Corrective Actions	Overdue corrective actions	0
Toolbox meetings	1 per week (Safety & Environmental KPI combined)	100% attendance

6. OVERALL PROJECT ACTIVITY DESCRIPTION

The below table describes the activities proposed for the Mardie Project. This list is not expansive and will be updated as more detail is available. As the proposed extents below are subject to change, the Company will comply with disturbance limits imposed in regulatory approvals.

Table 4 Project Activities

Element
Physical Elements
Ponds Envelope – evaporation and crystalliser ponds, processing plant, desalination plant, administration, accommodation camp, associated works (access roads, laydown, etc.)
Marine Envelope – trestle jetty export facility, seawater intake and pipeline, bitterns pipeline, outfall diffuser and mixing zone
Terrestrial Infrastructure Envelope – access / haul road, quarry, laydown, groundwater source bores, additional infrastructure
Transshipment Corridor Envelope – channel to allow access for transshipment vessels
Operational Elements
Bitterns discharge
Desalination Plant discharge
Groundwater abstraction
Dredge volume

7. RISK MANAGEMENT

Throughout the project, risks are identified, assessed, and controlled using a number of different tools. The identification of environmental activities and the respective potential impact to the environment is determined following a review of the:

- contract and its associated environmental conditions; and
- actual scope of work and consideration of all applicable legislation, standards, and other conditions.

The Project Risk Register details the relevant environmental aspects, their associated impacts, the mitigation control, and a rating of their significance. Refer to the Project Risk Management Procedure (MAR-0000-RM-PRO-EGM-020-0001).

8. TRAINING AND COMPETENCY

To ensure the project team understand their responsibilities and expectations in relation to environmental management, training and awareness will occur continuously throughout the course of the Project (as indicated in Table 5. The training and awareness requirements for this CEMP have been broken down into the following categories:

- induction training,
- task specific training with competency assessment, and

- awareness training.

Table 5 Environmental Training Matrix

Category	Recipients	Frequency	Items
Induction training	All people on the site	Start of work, return from extended leave, or site access	Site specific induction
Task-specific training with competency assessment	Project personnel / Contractors, as required	As required for activity with potential environmental risks or as a result of high risk task, specific incidents (s) trends.	Selected modules
Awareness	Project personnel / Contractors, as required	Periodic	Toolbox meetings / posters / memos

8.1 Induction Training

All project personnel and visitors seeking to attend site will be subject to a Company, Project and Contractors own Site Induction and induction assessment, in accordance with the Site Induction. This induction will include relevant environmental information.

The Company induction will include the following in relation to environmental awareness:

- Overview of the Environment and Social Management System (ESMS);
- Company legal and other obligations;
- Project specific potential environmental impacts and controls including:
 - weed controls and wash down procedures;
 - ground disturbance and topsoil management;
 - fauna management (both native and pest species);
 - incident notification and procedures;
 - waste management, including litter control and recycling;
 - spill response procedures; and
 - aboriginal heritage awareness.

An induction and training register will be used to record and monitor induction attendance by all personnel.

8.2 Task specific Environmental Training with Competency Assessment

Task specific environmental training (e.g. spill response training, fauna handling training) for some group or individual project personnel will be conducted. Training to be undertaken may be in response to an environmental occurrence or incident(s) or as determined by project leadership. All such training will be documented and participants may be assessed in relation to their competency, if applicable.

8.3 Environmental Awareness Training

An environmental awareness program will be implemented during the Project to assist in maintaining effective environmental management. Awareness training may consist of regular toolbox meetings, posters and memos/alerts. This program will be designed to periodically reiterate the environmental objectives and specific environmental controls for the Project. Topics may include:

- new controls or work instructions,
- reinforcement of induction content,
- results of inspections and audits, and
- awareness of environmental events or incidents.

8.4 Environmental Qualifications

All personnel directly involved in environmental management shall be appropriately qualified to undertake the tasks of the position to which they are appointed.

9. COMMUNICATION

Achieving effective communication between all parties is critical to ensure that the requirements of this CEMP are met. Typical methods of communication on site:

- Pre-start meetings,
- Toolbox talks,
- Project inductions,
- Noticeboards, and
- Environment alerts.

Pre-start and toolbox meetings include delivering key environmental messages and audit and inspection results and communicating environmental risks for the scheduled activities. Pre-start meetings are minuted and available for workers/visitors if required.

The HS and ENV Advisors ensure that relevant documentation is filed electronically, and hard copies made available to personnel. Hard copy documentation made available to personnel typically includes:

- Project Health and Safety Management Plan,
- Project Emergency Management Plan,
- Construction Environmental Management Plan (this Plan),
- Company Policies,
- Safe Work Instructions,
- Critical Control Standards,
- JHA,
- Communication Meeting minutes, and
- Copies of relevant legislation and codes of practice where required.

9.1.1 External Communication

Direct communication with the media and general public is not permitted.

All communications to external parties shall be directed through the Company in accordance with the Project communications requirements.

Any requests from the media or general public are referred to the Company who takes action in accordance with the project's Stakeholder & Communication Management Plan.

All direct communication with statutory authorities is approved by the Company.

10. CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLANS

Environmental Management Plans (EMP) have been developed for environmental factors that have common linkages between the construction activities and potential environmental impacts. For each EMP objectives have been developed to define the desired state of the environmental factor to be achieved. To achieve the EMP objectives, the assigned management actions must be implemented throughout the Project construction phase and evaluated for effectiveness on a periodic basis. Each management action includes auditable timelines, clear identification of record keeping and assigns responsibility. The identified environmental factors include:

- Ground Disturbance,
- Erosion and Sediment Control,
- Soils
- Waste,
- Hydrocarbons and Chemicals, and
- Mesquite and other Weeds.

Several environmental factors must be managed in accordance with management plans that are specified in conditions of approvals – known as regulatory management plans. The following regulatory management plans contain obligations that must be met during construction. These are referenced throughout this Construction Environmental Management Plan where relevant:

- Groundwater Monitoring and Management Plan
- Marine Environmental Quality Monitoring and Management Plan
- Benthic Communities and Habitat Monitoring and Management Plan
- Dredge Management Plan
- Marine Pest Procedures / Management Plan
- Long-term Migratory Shorebird Monitoring and Management Plan
- Illumination Plan
- Marine Turtle Monitoring Program
- Heritage Management Plan
- Monitoring and Adaptive Management Plan.

10.1 Ground Disturbance

Land clearing and topsoil disturbance activities associated with the construction of the Project will be managed through a Ground Disturbance Permit (GDP). The GDP allows for the assessment of the disturbance area to ensure that all environmental approval and heritage obligations are complied with. In addition, the GDP enables the collection of data used for corporate reporting, statutory reporting such as annual environmental reporting and closure liability estimates.

A *Minuria tridens* research strategy has been conditionally approved by DWER CEO in accordance with MS1175 condition 5-3(2)(b). In addition, BCI is collaborating with DBCA to identify opportunities for translocation of *M. tridens* plants that cannot be avoided during construction.

Table 6 Environmental Management Strategy for Vegetation Clearing

Ground Disturbance				
Objective	Minimise adverse impacts on the abundance, species diversity, geographic distribution, and productivity of vegetation communities. Minimise disturbance of any protected or listed flora species or ecological communities identified within the Project Area.			
Target	No occurrence of unlawful clearing. No disturbance for outside of the scope of the approved project activities.			
Potential Impacts	<ul style="list-style-type: none"> • Unapproved removal of, or disturbance to, flora, vegetation, and fauna habitat. • Unintentional loss of heritage value. • Soil erosion and sediment loss. • Inadequate materials available for rehabilitation of disturbance areas. • Spread of weeds beyond the Project area and introduction of new weed species to the area. 			
Management Action	Monitoring / Evidence	Timing	Responsibility	Supporting Documents
All vehicles and equipment movement will be restricted to existing tracks, roads and the area proposed for clearing.	Hard barriers Road Signage	Ongoing	Contractor/PMC	Traffic Management Plans

Ground Disturbance				
All areas proposed for clearing will be clearly delineated within an approved clearing area.	GDP	Prior to disturbance activities taking place.	Contractor/PMC	Ground Disturbance Permit. Ground Disturbance and Topsoil Stockpiling Procedure. Ground Disturbance Register
	Ground Disturbance Survey Data	Weekly during clearing activities. Annual aerial image to reconcile disturbance area.	PMC	Ground Disturbance and Topsoil Stockpiling Procedure.
Spatial records of conservation-significant flora and fauna will be used to assess ground disturbance permit applications. <i>Minuria tridens</i> will be managed in accordance with the <i>M. tridens</i> Research/Offset Strategy.	GIS GDP	Ongoing	BCI	Ground Disturbance Permit. Ground Disturbance and Topsoil Stockpiling Procedure.
Vegetation will be removed separately from topsoil where practical and placed in stockpiles. Stockpiles will not impede drainage or present a fire hazard. A minimum of 100mm of topsoil (where available) will be removed and stockpiled. Where possible, topsoil will not be stripped in areas of high mesquite infestation (mapped as Degraded or Poor quality in vegetation mapping) to prevent further spread. Pond floors within the intertidal zone will not be stripped, thus minimising disturbance to aid future rehabilitation. Topsoil stockpiles will be no greater than 2m high.	Topsoil stockpile inspections. Post clearing survey	Weekly during clearing activities. Annual material balance reconciliation.	PMC	Inspections reports

Ground Disturbance				
Any deviation from approved clearing will be reported as an incident to the Project Registered Manager.	Incident Report	Immediately after an incident being reported.	Contractor	Incident reporting procedure

10.2 Fauna

The project site extends across a variety of fauna habitat including marine, tidal creeks, mudflat islands, spinifex grasslands and riparian creeks/pools. Construction activities can cause direct impacts (e.g. fauna strikes, entrapment in excavations) and indirect impacts from habitat destruction, poor waste management, increased feral fauna.

Mardie Road passes through rocky foraging habitat for the endangered Northern Quoll. Northern Quoll are known to scavenge roadkill, the risk of vehicle strike must be managed during construction. Mardie Road is planned to be a gazetted public road during operations.

Management strategies for terrestrial fauna are outlined in Table 7. Refer to the Dredge Management Plan, Marine Turtle Monitoring Program and Underwater Noise Management Procedure for management of marine fauna.

Table 7 Environmental Management Strategy for Fauna

Fauna				
Objective	Minimise adverse impacts on the abundance, species diversity and geographic distribution of fauna. Minimise disturbance of habitat of any protected or listed fauna species identified within the Project Area.			
Target	No occurrence of unlawful clearing. No conservation significant vertebrate fauna mortalities as a result of project activities.			
Potential Impacts	<ul style="list-style-type: none"> • Unapproved removal of, or disturbance to fauna habitat. • Unintentional impacts to fauna of conservation significance. • Fauna injury or mortality through vehicle strike or entrapment in construction areas. 			
Management Action	Monitoring / Evidence	Timing	Responsibility	Supporting Documents

Fauna				
All vehicles and equipment movement will be restricted to existing tracks, roads and the area proposed for clearing.	Hard barriers Road Signage	Ongoing	Contractor/PMC	Traffic Management Plans
Disturbance of habitat for conservation-listed species will be minimised.	GDP assessment to include check of key fauna habitats.	Ongoing	BCI General Manager Landside Projects	Ground disturbance permit procedure. Ground disturbance permits. GIS Spatial data – key fauna habitats.
	Restrict clearing of Northern Quoll foraging habitat associated with the quarry to daytime due to nocturnal activity of the species	During construction	PMC/Contractor	Ground disturbance permit procedure. Ground disturbance permits. GIS Spatial data – key fauna habitats.
Restrict personnel access to Northern Quoll denning/shelter habitat to approved/qualified environmental staff and contractors	Signage on road and generally at habitat boundary	Ongoing	BCI General Manager Landside Projects	N/A
Fauna handlers to be onsite during clearing of conservation-significant fauna habitat.	Clearing procedure (in preparation)	During construction	PMC/Contractor	Clearing Procedure. Ground Disturbance Procedure.
Any deviation from approved clearing will be reported as an incident to the Project Registered Manager.	Incident Report	Immediately after an incident being reported.	Contractor	Incident reporting procedure
Roadkill observed on Mardie Road will be removed and relocated at least 50m away from the road.	Fauna sighting register	Ongoing	All personnel	Fauna Strike Management Procedure (Appendix 1), Fauna sighting register.

Fauna				
Low speed zones implemented in significant fauna habitats as per EPBC 2018/8236 Attachment 7: <ul style="list-style-type: none"> • Around Mardie Pool at all times, and • Northern Quoll foraging habitat on Mardie Road from dusk until dawn 	Speed zone signs installed. Low speed zone implemented	Complete August 2022. Continue through construction.	BCI Operations All personnel	Environmental incident register (INX InControl)
	Random speed checks.	Ongoing	PMC	Incident records – INX InControl
Trenches/excavations designed and managed to minimise fauna entrainment: <ul style="list-style-type: none"> • Open trenches checked for fauna within 2 hours of dawn. • Fauna egress points /refuge placed regularly along the length of open trenches. 	Work area inspection include dawn and end-of-shift trench checks	During excavations	Contractors	Contractor work area daily inspections.
Introduced fauna monitoring: cats, foxes, rabbits, pigs, and cane toads Control program when required.	Fauna sightings register spatial records. Annual introduced fauna survey results. Fauna control records	Annual	PMC	Mardie Fauna sightings register. GIS spatial data.

10.3 Erosion and Sediment Control

Most of the site is located within the influence of high tides, with embankment construction methodology allowing free movement of tides up until closure of the pond perimeter. Landward Project activities will be conducted in a way that will reduce the duration of soil exposure to erosive forces (wind and water) by developing areas progressively as-needed.

Marine Project activities will be conducted in accordance with the MS 1175 approved documents:

- Dredge Management Plan and
- Marine Environmental Quality Monitoring and Management Plan.

Table 8 Environmental Management Strategy for Erosion and Sediment Control

Surface Water				
Potential Impacts – Construction				
Objective	Minimisation of actual or potential environmental harm to receiving environments associated with soil loss and disturbance resulting from work activities. Protect Benthic Community and Marine Habitats beyond the Project development envelope.			
Target	No measure of sediment loss beyond the project footprint.			
Potential Impacts	<ul style="list-style-type: none"> • Increased sediment load from roads, causeways, and embankments. • Loss of BCH, Mangrove or Marine ecosystem function due to loss of light or smothering. 			
Management Action	Monitoring / Evidence	Timing	Responsibility	Supporting Documents
Roads, causeways, and embankments (>2.45 mAHD) will be constructed in accordance with the Embankment Construction Methodology which include provisions to:	Visual embankment inspections including photographic evidence during construction.	Daily	PMC	Daily construction report

Surface Water				
<ul style="list-style-type: none"> • Construct site access roads to include crossfall drainage and erosion resistant surface • Undertake initial civil works in the drier season months (Jul – Dec), as far as schedule allows • Minimise disturbance to existing vegetation • Promptly stabilise exposed areas once civil works are completed • Protect the soil surface by placement of non-erosive material, protection with geotextile and/or use of soil binder • Apply dust suppression by wetting of exposed surfaces (e.g. water truck) 	<p>Water quality monitoring as per the Marine Environmental Quality Monitoring and Management Plan (MEQMMP).</p>	<p>As per the designated monitoring schedule within the MEQMMP.</p>	<p>PMC</p>	<p>MEQMMP</p>
<p>Roads, causeways, and embankments (<2.45 mAHD) will be constructed in accordance Embankment Construction Methodology which include provisions to:</p> <ul style="list-style-type: none"> • Stage works to suit favourable tidal periods (i.e. when site is not inundated), as far as practical • Schedule works so that activities impacted by tides are completed in the early stages of construction • Remove unsuitable material to outside of the area of tidal influence (e.g. designated protected stockpile area) • Install floating sediment curtain 	<p>Water quality monitoring as per the MEQMMP.</p>	<p>As per the designated monitoring schedule within the MEQMMP.</p>	<p>PMC</p>	<p>MEQMMP</p>

Surface Water				
Whole of site flood management: <ul style="list-style-type: none"> • Erosion • Embankment collapse 	Mardie Pool sampling - TSS, electrical conductivity (EC).	Subject to Part V licensing: EC loggers (subject to Traditional Owner consent) checked quarterly or quarterly grab sample. Fortnightly for 3 months after flood event (subject to access availability), then monthly for 3 months.	PMC	Mardie Project surface water sampling procedure (in preparation).
	Mount Salt Mound Spring visual monitoring.	Subject to Part V licensing: Quarterly EC grab sample.	PMC	Mardie Project surface water sampling procedure (in preparation).
	Embankment stability monitoring	Subject to Part V licensing: Monthly Within 24 hours of 1:20 yr ARI.	PMC	Area inspection checklists.
Chemical and hydrocarbon management storage and handling to be in accordance with Australian Standards.	Inspections of chemical/hydrocarbon storage and transfer areas (see Section 10.6 and Section 14.1).	Monthly	PMC	Area inspection checklists.

10.4 Acid Sulphate Soils

The management strategies within Table 8 9 will ensure that the risk of acid sulphate soils is understood and managed.

Table 9 Environmental Management Strategy for Acid Sulphate Soils

Soils				
Potential Impacts – Construction				
Objective	<ol style="list-style-type: none"> 1. Minimisation of actual or potential environmental harm to receiving environments associated with acid sulphate soils. 2. Protect Benthic Community and Marine Habitats beyond the Project development envelope. 			
Target	No impacts to the environment or geotechnical integrity of infrastructure caused by Acid Sulphate Soils or potentially acid forming material.			
Potential Impacts	<ul style="list-style-type: none"> • Contamination of soils, surface waters and marine environment. • Degradation or corrosion of engineered structures. 			
Management Action	Monitoring / Evidence	Timing	Responsibility	Supporting Documents
Conduct geotechnical investigations of potential borrow areas to determine the risk of ASS.	ASS sampling of construction borrow material.	During geotechnical investigations	BCI	Desktop ASS assessment (completed for Original Mardie Project)
	Mapping of ASS/PAF material	Prior to construction	BCI	GIS Spatial database
Excavation and groundwater abstraction will be avoided in areas recorded as posing risk of ASS.	Geotechnical investigations report. GIS spatial mapping.	During construction	Contractors	GIS Spatial database
If required: ASS/PAF material to be managed in accordance with an Acid Sulphate Soils procedure	ASS soil handling records. GIS spatial mapping.	If ASS material is encountered.	Contractors	Acid Sulphate Soil Procedure (if ASS is recorded in the Project) GIS Spatial database

10.5 Waste

The management of hazardous and non-hazardous waste will be standardised during the construction phase to protect human health and the surrounding environment. Waste streams generated during the construction phase will include:

- Wastewater from treatment plants;
- Putrescible waste (food scraps, paper);
- Inert waste (non-hazardous industrial waste);
- Recyclable or reusable materials; and
- Hazardous waste (hydrocarbon/chemical contaminated materials).

The environmental management strategy for waste has been provided in Table 10.

Table 10 Environmental Management Strategy for Waste

Waste				
Objective	Ensure general waste (industrial, inert, recyclable and putrescible waste) is effectively contained and does not interact with the surrounding environment. Apply principles of waste minimisation through careful product selection, reuse and recycling. Waste management practices and procedures meet industry standards and satisfy statutory requirements.			
Target	<ul style="list-style-type: none"> • All waste is either recycled or removed off site by a waste contractor to a licensed waste disposal facility. • No cross contamination of waste 			
Potential Impacts	<ul style="list-style-type: none"> • Dispersal of wastes in project and surrounding areas which result in visual pollution. • Release of hazardous or toxic pollutants into the environment. • Attraction of feral animals because of poor putrescible waste management. 			
Management Action	Monitoring / Evidence	Timing	Responsibility	Supporting Documents
Recyclable/reusable waste will be segregated.	Environmental Inspection	Weekly	PMC	Waste Segregation Register

Waste				
All wastes (putrescible, recyclable, non-reusable) will be sent offsite for disposal.	Environmental Inspection	Weekly	PMC	HSEC Area Inspection Form
Reusable wastes will be catalogued and stored within a designated laydown area.	Environmental Inspection	Weekly	PMC	Waste Segregation Register HSEC Area Inspection Form
All general purpose bins will be lidded and emptied regularly to ensure the lids remain completely shut.	HSEC Area Inspections	Weekly	Contractor	HSEC Area Inspection Form
All hazardous substance will be sent off site for disposal.	Controlled waste tracking forms.	As required.	PMC	Controlled Waste Tracking Procedure

10.6 Hydrocarbons, Chemicals and Brine

Management actions have been assigned for the handling, storage, disposal and clean-up of hydrocarbons and chemicals that will be required during construction phase. These strategies have been summarised in Table 11.

Table 11 Environmental Management Strategy for Hydrocarbons and Chemicals

Hydrocarbons and Chemicals				
Objective	Identify the potential direct and indirect impacts of chemical and hydrocarbons and develop management measures to minimise the potential environmental impacts associated with chemical and hydrocarbon transport, storage, handling and disposal.			
Target	<ul style="list-style-type: none"> All liquid chemicals are stored in accordance with Australian Standard 1940:2004 No spills from bulk storage facilities. All minor spills are remediated effectively. No sites registered under the <i>Contaminated Sites Act 2003</i>. 			
Potential Impacts	<ul style="list-style-type: none"> Contamination of groundwater and surface water due to incorrect storage, handling and spillage of hydrocarbons and chemicals. Dispersal of hydrocarbon wastes within the project and surrounding areas which result in visual pollution. Injury or death to local fauna (uncovered greases/oils etc.). 			
Management Action	Monitoring / Evidence	Timing	Responsibility	Supporting Documents

Hydrocarbons and Chemicals				
<p>Hydrocarbons will either be stored in self-bunded containers or within bunded areas to prevent spills being discharged to the environment.</p> <p>Hydrocarbon bunding will be of sufficient volume for the liquid chemical(s) stored. This required bunding volume will be the greater of, 25% of the total stored capacity or 110% of the capacity of the largest vessel.</p> <p>Liquid chemicals will be stored within a bund compliant with Australian Standards 1940 - 2004.– The storage and handling of flammable and combustible liquids and AS 1692 – Tanks for flammable and combustible liquids.</p>	HSEC area inspections	Weekly	Contractor	HSEC area inspections Form
<p>All mobile plant/equipment will be inspected for potential mechanical failure, that could lead to leaks or spills, by a suitably qualified trade (e.g. mechanic, fitter) prior to operating on Site.</p>	Mechanical inspection.	Prior to utilising equipment.	PMC	Mechanical Inspection Form Mechanical Inspection Register.
<p>Prestart mechanical and safety inspections are conducted.</p>	Equipment prestart inspections.	Daily	Contractor	Prestart Inspection Form
<p>All mobile equipment will be services within a designated service area equipped with an impermeable floor.</p>	HSEC area inspections	Daily	Contractor	HSEC Area Inspections Form
<p>The refuelling truck will be equipped with drip trays, spill recovery and clean up materials</p>	Daily workplace inspection	Daily	Contractor	Daily Workplace Inspection Form
<p>All spills to ground will be recorded as an incident and reported to the Project Registered Manager.</p>	Incident report forms	As required	All	Incident Report Procedure
<p>Hypersaline pipelines will be bunded and/or double cased to ensure containment of spills.</p>	Commissioning report	During commissioning	Contractor	NA
<p>Pipeline pressure/flow leak detection monitoring will be installed and interlocked with the pump, resulting in a shutdown of pumping if the flow drops below a certain level.</p>	Commissioning report	During commissioning	Contractor	NA

Hydrocarbons and Chemicals				
Chemical and hydrocarbon management storage and handling to be in accordance with Australian Standards.	Inspections of chemical/hydrocarbon storage and transfer areas (see also Section 14.1).	Monthly	PMC	Area inspection checklists.

10.7 Weeds – Mesquite

Mesquite is a weed of national significance. At Mardie Project mesquite is a hybrid of *Prosopis glandulosa*, *P. glandulosa x velutina* and *P. pallida*. It is highly invasive and requires integrated management using mechanical, chemical and biological control techniques. Mardie’s objective is to reduce or contain the mesquite infestation within the Project area.

The management strategies within Table 12 have been developed to be consistent with the National Heritage Trust’s [Weed Management Guide – Mesquite – Prosopis species](#) and in consultation with the Pilbara Mesquite Management Committee. Implementation will ensure that mesquite within the Project area is not spread beyond the Project and is controlled within the Project.

Table 12 Environmental Management Strategy for Mesquite.

Weeds				
Objective	To control mesquite within the Project and prevent mesquite from spreading beyond the Project.			
Target	<ul style="list-style-type: none"> Decrease in area within the Development Envelope that is densely infested with Mesquite compared to baseline. No earthmoving equipment enters the Project area containing soil and debris. No mobile equipment leaves site containing weed seeds and/or soil. 			
Potential Impacts	<ul style="list-style-type: none"> Loss or decline in habitat. Reduction in biological diversity. Delayed rehabilitation success. Loss or decline of pastoral productivity. 			
Management Action	Monitoring / Evidence	Timing	Responsibility	Supporting Documents
Establish baseline mapping of mesquite within Optimised Mardie Project area.	Mesquite extent spatial data in GIS.	complete	BCI GIS	ArcGIS spatial layer for Mesquite.

Weeds				
Site inductions and toolbox training to include Mesquite awareness.	Mardie Project Induction. Toolbox topic – Mesquite awareness.	Complete Prior to clearing in Mesquite infested areas of Optimised Mardie Project Development Envelope.	PMC	Mardie Project Induction Powerpoint presentation.
Develop and implement clearing and soil movement procedure for areas infested with Mesquite.	Clearing monitoring.	Prior to clearing in Mesquite infested areas of Optimised Mardie Project Development Envelope.	BCI	Mesquite hygiene procedure (in preparation in consultation with PMMC).
Where possible, topsoil will not be stripped in areas of high mesquite infestation (mapped as Degraded or Poor quality in vegetation mapping) to prevent further spread.	Topsoil stockpile inspections. Post clearing survey	Weekly during clearing activities. Annual material balance reconciliation.	PMC	Inspections reports
Internal Ground Disturbance Permitting procedure to include Mesquite hygiene requirements.	GDP procedure and GDP form.	Complete	BCI	GDP Register
Conduct Mesquite clearing trials.	Mesquite clearing trial results.	Q3 – Q4 2022	BCI Mardie Project	Mesquite clearing trial proposal in consultation with Pilbara Mesquite Management Committee. Mardie Project Mesquite clearing trial report.
Earthmoving equipment will be free of soil and debris prior to entering the Project area.	Vehicle Weed Inspection Form Vehicle Weed Inspection Register	Prior to earthmoving equipment arriving onsite.	Contractor	Vehicle Weed Inspection and Cleaning Procedure. Vehicle Weed Inspection Vehicle Weed Inspection Register

Weeds				
All vehicles leaving the Project are inspected to ensure they are free of weed seeds and soil.	Vehicle Weed Inspection Form Vehicle Weed Inspection Register	Prior to any vehicle leaving site.	Contractors	Vehicle Weed Inspection and Cleaning Procedure. Vehicle Weed Inspection. Vehicle Weed Inspection Register

10.8 Weeds – General

The management strategies within Table 14 will ensure that new weed species are not introduced to the Project area and that weeds from within the Project area are not spread beyond the Project.

Table 13 Environmental Management Strategy for Weeds.

Weeds				
Objective	To ensure that new weed species are not introduced to the Project area and that weeds from within the Project area are not spread beyond the Project.			
Target	<ul style="list-style-type: none"> No new weed species identified in the Project area. No earthmoving equipment enters the Project area containing soil and debris. No mobile equipment leaves site containing weed seeds and/or soil. 			
Potential Impacts	<ul style="list-style-type: none"> Loss or decline in habitat. Reduction in biological diversity. Delayed rehabilitation success. Loss or decline of pastoral productivity. 			
Management Action	Monitoring / Evidence	Timing	Responsibility	Supporting Documents
Earthmoving equipment will be free of all soil and debris prior to entering the Project area.	Vehicle Weed Inspection Form Vehicle Weed Inspection Register	Prior to earthmoving equipment arriving onsite.	Contractors	Vehicle Weed Inspection and Cleaning Procedure. Vehicle Weed Inspection Vehicle Weed Inspection Register
All vehicles leaving the Project are inspected to ensure they are free of weed seeds and soil.	Vehicle Weed Inspection Form Vehicle Weed Inspection Register	Prior to any vehicle leaving site.	Contractors	Vehicle Weed Inspection and Cleaning Procedure. Vehicle Weed Inspection. Vehicle Weed Inspection Register

10.9 Heritage

There are several significant heritage sites identified within the Project area. These sites and the relationships with the traditional owners will be managed as per the heritage strategy summarised in Table 14. See also the approved Mardie Project Heritage Management Plan, as per conditions of MS1175.

Table 14 Heritage Management Strategy

Heritage				
Objectives	To identify and manage aboriginal heritage that may be affected by the Project in a manner that complies with Legislation, the Land Access Deeds with the Yaburara Mardudhunera and Kuruma Mardudhunera Native Title claim groups and the commitments made to these groups.			
Targets	<ul style="list-style-type: none"> No unlawful disturbance of heritage areas. No Project activities to be conducted outside of the Land Access Deeds with the YM and KM Native Title claim groups. 			
Potential Impacts	<ul style="list-style-type: none"> The destruction of significant aboriginal sites and objects. Lost relationships with the YM and KM Traditional Owners. 			
Management Action	Monitoring / Evidence	Timing	Responsibility	Supporting Documents
Heritage sites and their buffer zones will be clearly delineated in the field within the Project area. Access to these areas entry will be prohibited.	Hard barricades and signage	Prior to construction	Contractor	Heritage Sites Register Inspection
Clearing activities to be conducted under the GDP process (refer to Section 10.1)	GDP	Prior to disturbance activities taking place.	Contractor	Ground Disturbance Permit. Ground Disturbance and Topsoil Stockpiling Procedure. Ground Disturbance Register

Heritage				
Should the Contractor or employee become aware of a potential heritage site within an area of proposed clearing, all activity will cease immediately in this area and the Contractor will inform the Mardie Construction Supervisor.	Hazard report	As required.	All	Incident and Hazard Reporting Procedure
Any disturbance to heritage sites will be reported as an incident to the Mardie Environmental Advisor immediately.	Incident Report	As required	All	Incident and Hazard Reporting Procedure

11. CONDITIONAL ENVIRONMENTAL MANAGEMENT PLANS

Conditional Environmental Management Plans have been/are being developed to satisfy the obligations of Ministerial Statement No. 1175 and EPBC 2018/8236 approval. These are listed in Section 10.

BCI is responsible for monitoring compliance with Conditional Environmental Management Plans during construction.

12. EMERGENCY MANAGEMENT

The site-specific Emergency Management Plan has been developed and the Company Incident Management Procedure will be followed in the case of an environmental emergency.

Where significant environmental harm has occurred, or is pending, due consideration must be given to the utilisation of professional response management services.

13. INCIDENT REPORTING AND INVESTIGATION

An incident is any unplanned event, that causes (or has the potential to cause) damage to the natural environment, cultural and heritage areas. An incident can be a 'near miss' event.

All property damage, environmental harm and significant near misses will be verbally reported immediately to the Company as soon as practicable after the incident and in any case in writing within 24 hours of the incident occurring.

The Contractor will report incidents to the Company as soon as practicable after the incident. Incidents will be reported, investigated and managed as per the Company Incident Reporting and Management Procedure (BCI-WHS-PR-009).

13.1 Notifiable Incidents

The Company's Safety, Compliance and Services team shall ensure timely notification to the appropriate statutory regulator in accordance with legislation. If a Notifiable Incident occurs in relation to the Work, the Contractor will complete the following:

- Immediately notify the Construction Manager of the Notifiable Incident.
- Investigate the Notifiable Incident.
- Where site preservation is required by the Environmental requirement, ensure, so far as is reasonably practicable, that the part of the Site where the Notifiable Incident occurred is not disturbed until further direction is given to the Contractor by the Company.
- As soon as is practicable, provide the Company with evidence that the hazards or risks giving rise to the Notifiable Incident have been eliminated or reduced, so far as reasonably practicable, including (if required and subject to legal professional privilege) a copy of its incident investigation report.

13.2 Incident Investigation

All incidents will be investigated as to the Company Incident Management Procedure (BCI-WHS-PR-009).

The incident investigation team will comprise members of the Contractor Management Team and the process may involve taking witness statements, photographs and data collection although this list is not exhaustive.

Table 15 Incident Investigation Team

Classification	Lead Investigator	Investigation Team Members	Other Members	Investigation Type
Significant Outcome Events	ICAM trained Lead Investigator	Immediate Line Supervisor of person involved in incident Site Environmental Personnel & Reps	Company Environmental personnel Legal representative	ICAM
Non-Significant	Supervisor Lead	Personnel involved in incident	Technical Specialists	'5 Whys' Analysis

The incident investigation shall include the following basic elements:

- identify the cause of the incident,
- identify the necessary corrective and preventative action(s),
- identify personnel responsible for carrying out corrective and preventative action (s),
- implement or modifying controls necessary to avoid repetition,
- record any changes in written procedures required, and
- notify the Company of all site environmental issues.

13.3 Lessons Learnt

Information gathered from incident investigations will be analysed to identify lessons and monitor trends. The Contractor is responsible for this analysis and reporting of significant lessons or trends to the Project Team for the purpose of improving environmental systems or practices.

The Company will share the lessons or trends findings across the Project Team, with project stakeholders and others if required.

14. MONITORING & CORRECTIVE ACTION

14.1 Audit & Inspection

Audits will be conducted to ensure the ongoing compliance with regulatory requirements, adequacy and effectiveness of the CEMP, and to facilitate continuous improvement. Environmental audits are planned and scheduled with all other project audits, and detail the type of audit, duration, auditors (including the Lead Auditor), and dates.

The findings from internal audits on the implementation of the CEMP for the project are provided to the Project Manager.

Whenever practicable, personnel conducting an audit address the identified deficiencies immediately during the inspection. In all other cases the Action will be added into the INX InControl Event Management Register and a nominated person will be made responsible for ensuring the action is managed in accordance with the set date for completion. The Environmental Advisor monitors and reports on the progress of rectification of any outstanding corrective actions.

14.1.1 Contractor Audits

Contractors are required to undertake audits of their workspace, as communicated to the Contractor through the tender and contract. Compliance with this requirement is a contract deliverable and is defined in the Contractor Data Requirements.

14.2 Environmental Non-Compliance

Non-compliances raised by project audits are registered and controlled in accordance with Incident Reporting and Investigation and using INX InControl.

Possible non-compliances include regulatory non-compliance, non-compliance with the management measures outlined in this CEMP, and mitigation strategies/ management measures outlined in the CEMP sub-plans.

All non-compliances are registered and controlled using INX InControl.

Where detected, any non-compliance or environmental impact exceeding specified limits are investigated by the Environmental Advisor to determine the extent of possible non-compliance. The non-compliance is corrected as soon as possible with necessary action taken to prevent recurrence.

All non-compliances are reported to the Company and clearly identify the corrective/ preventative actions to be taken and the close-out date.

14.3 Environmental Complaints

Third party environmental complaints are managed in accordance with the Company Communication and Consultation processes.

14.4 Environmental Breach

Contractors found to be in breach of this CEMP are managed in accordance with the contract under which they have been engaged.

14.5 Reporting

Environmental performance is reported for the Project in accordance with Project Execution Plan requirements.

Environmental performance is reviewed and documented via minutes of scheduled project meetings utilising inputs from the Environmental Advisor, Construction Manager, and HSE Manager.

15. REFERENCES

Document Number	Description
BCI-ENV-POL-001	Environment and Community Policy
MAR-0000-EV-RRG-BCI-000-0001	ESMS Risk Register
BCI-WHS-PR-1-A	Consultation and Communication procedure
BCI-WHS-PR-009-A	Incident Reporting and Management
BCI-WHS-PR-004-0	Hazard and Task Based Risk Management Procedure
MAR-0000-EV-PRO-BCI-000-003	Ground Disturbance Procedure
BCI-SUS-WI-002	Demarcation and Survey Work Instruction
MAR-0000-EV-PRO-BCI-000-0004	Vehicle Weed Inspection and Cleaning Procedure
BCI-WHS-ST-002-0	Health and Safety Critical Control Standards
BCI-WHS-PRO-022 Previously issued as MAR-0000-HS-PRO-BCI-000-0004	Hazardous Chemical Management
0000-HS-PRO-001 Previously issued as MAR-0000-HS-PRO-EGM-020-0012	Temporary Laydown Procedure
BCI-ENV-PRO-007 Previously issued as MAR-0000-EV-PRO-EGM-020-0005	Spill Response Procedure
BCI-ENV-PRO-005 Previously issued as MAR-0000-EV-PRO-EGM-020-0003	Waste Management Procedure
BCI-ENV-PRO-004 Previously issued as MAR-0000-EV-PRO-EGM-020-0002	Air Quality Management Procedure
BCI-ENV-PRO-003 Previously issued as MAR-0000-EV-PRO-EGM-020-0001	Water Management Procedure
BCI-ENV-PRO-006 Previously issued as MAR-0000-EV-PRO-EGM-020-0004	Fauna Management Procedure
BCI-ENV-PRO-007	Fauna Strike Management Procedure
MAR-WHS-PLN-003	Emergency Management Plan Mardie
MAR-0000-LH-PLN-BCI-000-0002	Stakeholder Engagement Management Plan

16. APPENDICES

Appendix 1

Fauna Strike Management Procedure

MARDIE SALT AND POTASH PROJECT

FAUNA STRIKE MANAGEMENT PROCEDURE

0	08 March 2023	Issued for Use	T Pavlos	J Mahony	J Mahony
Revision	Date	Description	Author	Checker	Approver
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Table of Contents

1. Purpose	1
2. Scope	1
3. Responsibility	1
3.1 Environment Manager	1
3.2 Construction Manager	1
3.3 Environmental Advisor.....	1
3.4 Health and Safety Advisor.....	2
3.5 Fauna Handlers	2
3.6 Site Personnel	2
3.7 All Employees.....	2
3.8 Contractors	2
4. Definitions	3
5. Procedure	3
5.1 General.....	3
5.2 Safety Considerations	4
5.3 General Fauna Strike Management Measures	4
5.4 Specific Management Measures.....	5
5.4.1 Driving	5
5.5 Training and Competency	5
5.6 Audit & Monitoring	5
5.6.1 Incidents, Non-Conformances, and Reporting	6
5.7 Adaptive Management & Review	6
6. References	6

1. PURPOSE

BCI Minerals (The Company) is committed to providing guidance for fauna strike management for work related activities to ensure that the impact to the environment is minimised, this includes:

- Prevent injury or death of listed species of conservation significance (EPBC Act & WC Act) and other native fauna;
- Record all fauna related incidents including injuries and deaths due to mobile equipment strike; and
- Ensure the safety of all BCI personnel and contractors.

2. SCOPE

This procedure applies to all Company personnel, Contractors and sub-contractors undertake works for the Company.

3. RESPONSIBILITY

3.1 Environment Manager

- Ensure trained Fauna Handlers are in place during construction and operational Projects; and
- Support Environmental Advisor to ensure Fauna Spotters are used in accordance with the Ground Disturbance Procedure.

3.2 Construction Manager

The Construction Manager is responsible for:

- Ensuring personnel attend inductions and where required, training courses before they commence site work;
- Communicating any specific fauna interaction considerations at pre-start meetings; and
- Ensuring that the Environmental Advisor is notified of any fauna related incidents.

3.3 Environmental Advisor

The Environmental Advisor is responsible for:

- Coordinating management of and providing advice in the event of fauna injuries or fatalities;
- Maintain qualifications records for Contractors Fauna Handlers;
- Recording fauna encounters in Fauna Interaction Register;
- Reporting fauna encounters, injuries and deaths in accordance with Project requirements, licenses, State and Commonwealth legislation;
- Raising awareness of fauna interaction issues with site personnel;
- Ensuring site personnel are aware of common fauna interactions;

- Ensuring site personnel are aware of species of conservation significance that potentially may be encountered and how to avoid them;
- Ensure speed zones are communicated to personnel via the site environmental induction, toolbox and pre-start meetings; and
- Humanely euthanise critically injured native fauna in accordance with accredited training practices.

3.4 Health and Safety Advisor

The Health and Safety is responsible for

- Providing advice and assistance on occupational health and safety matters regarding fauna interactions; and
- Ensuring the safety of employees is not compromised by imposing the conditions of this procedure.

3.5 Fauna Handlers

Fauna Handlers are responsible for:

- Handling, capturing and relocating fauna where required to the best of their capabilities;
- Reporting fauna encounters to the Environmental Advisor; and
- Assisting the Environmental Advisor with the handling and removal of fauna where required.

3.6 Site Personnel

All site personnel are responsible for:

- Adhering to designated access tracks and roads, drive to speed limits and maintain awareness of fauna, particularly at dawn, dusk and night;
- Reporting all fauna interactions, including dead or injured fauna to a Fauna Handler or the Environmental Advisor as soon as possible, including livestock and other domestic animals; and
- When safe to do so, removing dead fauna from roads in order to reduce the likelihood of other animals who may be present at the carcass also being struck by vehicles;

3.7 All Employees

All employees are responsible for ensuring they comply with the fauna management strategies applied at the site.

3.8 Contractors

All Contractors are responsible for ensuring they comply with the fauna management strategies applied at each site.

4. DEFINITIONS

Term	Definition
BCI	BCI Minerals Limited
Biodiversity	The variety of all life forms: the different plants, animals and micro-organisms, the genes they contain and the ecosystems they form; often considered at three levels: genetic diversity, species diversity and ecosystem.
Conservation	The protection, preservation, management, sustainable use, restoration, and enhancement of the natural environment.
Contractor	Persons appointed to undertake the works as described in the Contract.
Ecosystem	A community or an assemblage of communities of organisms, interacting with one another and the environment in which they live.
EMP	Environmental Management Plan
Environmental Impact	A change in the make-up, function, or appearance of the environment.
EPBC Act	Commonwealth Environmental Protection and Biodiversity Conservation Act 1999
ESA	Environmentally Sensitive Area
JHA	Job Hazard Analysis, a risk assessment conducted for work activities.
TEC	Threatened Ecological Community
The Company	BCI Minerals Limited
Station Owner	Pastoral Management Proprietary Limited (PMPL)
WC Act	Western Australian Wildlife Conservation Act 1950

5. PROCEDURE

5.1 General

Fauna protection is mandated by Commonwealth and State legislation. All works undertaken will include measures to minimise the impact to fauna. Threatened species and ecological communities searches have been conducted to ensure threatened species and communities are known, mapped, and avoided.

Threatened species include:

- Species listed as critically endangered, endangered, vulnerable, and migratory species under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999*; and
- Species listed as critically endangered, endangered, vulnerable, migratory, conservation dependent or specially protected under the *Western Australian Wildlife Conservation Act 1950*.

Where identified, locations of significant fauna habitat may be sign-posted and speed limits enforced.

Site activities such as vehicle movements, noise and artificial light emissions can have an adverse effect on fauna. A consequence of these activities includes habitat fragmentation (i.e. the removal or interruption of natural habitats), the subsequent displacement and/or death of fauna.

Risks associated with fauna strikes will be captured under the site risk assessment conducted to ensure strategies can be implemented to minimise negative environmental impacts, in accordance with BCI Risk Management procedure. Where a breach of a requirement in this procedure, or any license or approval conditions relating to fauna does occur, it will constitute an incident and will be reported immediately in accordance with the BCI Incident Reporting and Management Procedure and where necessary the appropriate statutory authorities.

5.2 Safety Considerations

Impacts with moving vehicles can cause injury or death of native fauna. The establishment of new roads and introduction of additional vehicles, particularly during the construction phase, have the potential to adversely impact on fauna. Between dusk and dawn, when some fauna are more active, are times when these interactions could be more prevalent.

If an animal is struck, then the body should be checked to confirm the animal is deceased. Additionally, in the case of marsupials, pouches should be checked for joeys. If the pouch contains a live joey, the live joey should only be removed by a qualified fauna handler. If the animal is deceased, it should be moved at least 50m from the road to eliminate the risks associated with fauna congregating at the carcass on the road edge.

Personnel must be aware of risks associated with handling injured or recently deceased fauna. Such risks include:

- Physical injuries, such as bites and scratches from animals;
- Cuts, abrasions, slips, trips and falls resulting from fauna encounters;
- Envenomation by venomous fauna (e.g. snakes);
- Allergies to animal parts such as hair and feathers; and
- Zoonosis (i.e. particular diseases found in animals that may be transmitted to humans).

A general fauna handling JHA will be used to assess hazards and risks and the controls to be implemented during general fauna encounters on site.

5.3 General Fauna Strike Management Measures

General mitigation measures include but are not limited to:

- All driving activities will be confined to designated and approved areas;
- Speed limits will be assigned to all site tracks and roads;
- Low speed limits will be imposed from dusk to dawn through significant fauna foraging habitat;
- All personnel undergo a familiarisation drive upon returning to site, where any changes to road conditions will be communicated;
- Fauna strike incidents will be recorded in INX;
- Euthanasia of native fauna is to be done by the Environmental Advisor and approved licensed Fauna Handlers only;
- Any stock requiring handling, removal or euthanasia is to be done by the Station Owner or by the Station Owner's delegate, under the Station Owner's approval;

- If injured fauna is found, personnel are not to interfere and are to keep some distance so as not to cause additional stress to the animal or potential injury to themselves;
- Injured fauna must be reported to the Environmental Advisor or Fauna Handler immediately;
- If dead fauna is found, report to Environmental Advisor or Fauna Handler. The pouch (if present) must be checked for young, and the carcass removed away from worksites (including roads) if appropriate and where safe to do so. All personnel are responsible for removing dead fauna from roads where practicable;
- Personnel will be made aware of appropriate actions regarding fauna interactions during their induction;
- Fauna management procedures will be reviewed in event of injury or fatality of conservation-listed fauna species as a result of a fauna strike.

5.4 Specific Management Measures

5.4.1 Driving

Specific management measures to mitigate the potential impacts from driving light vehicles, heavy mobile equipment, machinery, and equipment include the following:

- Vehicle movements will be confined to defined haul roads and access tracks;
- Vehicles are prohibited from leaving the designated project area footprint without an approved Ground Disturbance Permit;
- All personnel must drive to conditions and adhere to speed limits applied to haul roads (maximum 60 km/h) and access tracks (maximum 40 km/h);
- Low speed zones implemented in significant fauna habitats as per EPBC 2018/8236 Attachment 7:
 - Around Mardie Pool at all times, and
 - Northern Quoll foraging habitat on Mardie Road from dusk until dawn.
- If safe to do so, road kills must be removed from the road to a minimum distance of 50m away from the road into the vegetation to avoid further impacts on fauna, such as birds of prey feeding on carcasses; and
- All fauna injured or killed on roads or tracks must be reported to the Environmental Advisor as soon as possible.

5.5 Training and Competency

Communicating fauna management strategies will be conducted through general inductions and site-specific inductions carried out by the Company and Contractors. Other communication methods are also used to communicate strategies as detailed in the Consultation and Communication procedure.

5.6 Audit & Monitoring

Regular compliance auditing will be conducted to ensure management plans, procedures and regulatory authority licensing and permits are being adhered to.

The following types of audits may be conducted on the project site:

- Regulatory Authority auditing and inspections by the Department of Water and Environmental Regulation, Department of Biodiversity, Conservation and Attractions, and Department of Mines, Industry Regulation and Safety;
- Statutory Annual Environmental Reporting; and
- Internal auditing.

All audit findings are captured, and corrective actions responsibility will be assigned to appropriate personnel to ensure a timely close out.

An audit schedule has been developed for the site. Ongoing inspections and monitoring will be conducted in accordance with Company requirements.

5.6.1 Incidents, Non-Conformances, and Reporting

Results of any auditing, monitoring, and testing will be provided to the Environmental Advisor for information and action where incidents have been identified.

All fauna injuries and deaths will be regarded as an incident and must be reported immediately via the BCI Incident Management Procedure.

Records of fauna interactions, injuries, deaths, or entrapments will be kept by the Environmental Advisor.

The Environmental Manager coordinates reporting of fauna interactions, injuries and deaths to State and Commonwealth regulators in accordance with license conditions and legislative requirements.

5.7 Adaptive Management & Review

BCI is committed to improving environmental results and management practices throughout implementation of this management plan and has therefore implemented an adaptive management approach.

At a minimum, this plan will be reviewed annually through the construction phase and every two years during operation. It will also be updated based on review outcomes. The review will take into account whether management targets are being achieved or are likely to be achieved and will identify any updates required to realise the targets.

In the event of increased frequency of vehicle fauna strikes, an investigation will be done, including review of incident reports to check for patterns in fauna behaviour during daylight hours, locations of high fauna activity and the effectiveness of this procedure. Depending on the findings of the investigation, speed limits may be revised and/or fauna crossings installed.

6. REFERENCES

Document Number	Description
BCI-WHS-PR-009-A	BCI Incident Reporting and Management
BCI_WHS_SWP_009	Risk Management