GOVERNMENT OF WESTERN AUSTRALIA

Environmental Protection Authority

Environmental Protection Act 1986

Section 40(2)(a)

NOTICE REQUIRING INFORMATION FOR ASSESSMENT

PERSON TO WHOM THIS NOTICE IS GIVEN
Yindjibarndi Energy Corporation Pty Ltd (ACN: 667 821 865)
Unit 2, Level 13, No. 1 Spring Street
PERTH WA 6000

PROPOSAL TO WHICH THIS NOTICE RELATES:
Baru-Marnda Renewable Energy Project - APP-0029720

Pursuant to section 40(2)(a) of the *Environmental Protection Act 1986*, I, as a delegate of the Environmental Protection Authority (EPA), require that you provide the EPA with the following information for its assessment. A detailed breakdown is provided in Attachment 1.

1. General Requirements
Revise the Referral Supporting Document (RSD) to be consistent with EPA instructions and templates, current factor guidelines, and relevant State and Commonwealth policies and guidance. The RSD should include demonstrated application of mitigation hierarchy, a more detailed cumulative impact assessment, local and regional consideration of residual impacts, and consideration of Environmental Management Plans (EMPs), and inclusion of EMPs if required.

2. Proposal
Include detail on exclusion zones where direct impacts to environmental values within the proposal Development Envelope and describe alternative water supply options if groundwater investigations determine that water resources will not be sufficient.

3. Legislative Context
Provide information on all other decision-making authorities (DMAs), their statutory decision-making processes, and other approvals/licences, as well as clarification of land tenure and rights to access.

4. Stakeholder Engagement
Provide evidence of meaningful engagement and consultation with neighbouring land holders, land users, Traditional Owners, and visitors.

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5. Flora and Vegetation

Provide further information on flora and vegetation values present in the proposal Development Envelope (DE), as well as the 2025 post-wet season detailed flora and vegetation survey report.

6. Terrestrial Fauna

- Provide further information on terrestrial fauna values present or potentially present in the proposal DE including ongoing utilisation surveys and additional surveys where required.
- Conduct Collision Risk Modelling (CRM) or Exposure Risk Modelling (ERM).
- Provide an updated Bird and Bat Management Plan (BBMP).

7. Subterranean Fauna

Undertake a subterranean fauna desktop study and habitat assessment, as well as the appropriate survey type (basic, detailed, targeted) if indicated by desktop study.

8. Inland Waters

Provide further information on inland waters values present in the proposal DE, including hydrogeological conditions and effects of groundwater abstraction, hydrological conditions and flood risk, and undertake further investigations/modelling if required.

9. Social Surroundings

Undertake Aboriginal cultural heritage survey(s) of the proposal DE and provide clarifications relating to the Noise Impact Assessment (Sonus 2025) and Visual Impact Assessment (Ecoscape 2025).

10. Offsets

If significant residual impacts are identified, determine suitable offsets for the proposal which may include contributions to the Pilbara Environmental Offset Fund (PEOF) and/or design and funding of research, revegetation or rehabilitation project(s).

11. Matters of National Environmental Significance

Include an assessment of MNES in the revised RSD.

The Referral Information documentation must be revised to include and address the requested information.

Please provide an indicative timeline of the assessment, including when you expect to provide the requested information, by 13 October 2025.

The revised Referral Information documentation should be lodged via the Environment Online portal APP-0029720 - Baru-Marnda Renewable Energy Project in RFI-0000900. Please quote the reference number APP-0029720 on any further correspondence.

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

Yours sincerely

Darren Walsh
CHAIR

15 September 2025

ATTACHMENT 1: REQUIRED ADDITIONAL INFORMATION

Item		Requested additional information
1. General Requirements		
1a	Form and content	**Action:** - The general form and content of the revised Referral Supporting Document (RSD) should be in accordance with the EPA's Instructions and Template: How to prepare an Environmental Review Document (ERD Template) and the EPA's current environmental factor guidelines.
1b	Index of Biodiversity Surveys for Assessments (IBSA) data	All survey reports and data should be submitted via IBSA Submissions. Only ISBA *submission numbers* (the number assigned prior to data acceptance) were provided with the RSD. **Action(s)** - Confirm the IBSA number of all survey reports attached to the revised RSD. - If survey reports or data are revised after their initial acceptance into IBSA, this data must be updated in IBSA. Contact ibsa@dwer.wa.gov.au for assistance in such cases.
1c	Policy and guidance	**Action(s)** - Review the listed policy and guidance for each key environmental factor. Add additional EPA and other policy and guidance that is relevant to the proposal and the identified environmental values. - Consider relevant recovery plans, conservation advice and/or threat abatement plans for conservation significant species, communities, habitat (supporting, significant, and critical), and ecosystems that are known to occur, or are likely to occur in the vicinity of the proposal. Any instances where published guidance is not followed must be justified.
1d	Mitigation	**Action(s)** - Demonstrate application of the mitigation hierarchy (avoid, minimise, rehabilitate, offset) for all key environmental factors as per the EPA's 'Statement of environmental principles, factors, objectives and aims of EIA' (EPA, April 2023). - Describe any innovative designs/construction techniques that have been incorporated to minimise the disturbance footprint and/or impacts to environmental values. - Where additional mitigation measures are required, these may be detailed in an EMP, with justification provided as to why outcomes-based condition(s) are not considered practical (refer to item 1h).

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1e	Cumulative impacts	The cumulative impact assessment (CIA) provided in the RSD only considers the combined impacts with the Jinbi Solar Facility. A CIA requires consideration of the total (direct and indirect) impact of the proposal, in addition to the total (direct and indirect) impact of other existing and foreseeable proposals, upon environmental values. The CIA should assess cumulative impacts at a local and regional scale (within 100 km), which is likely to include more proposals/developments than the Jinbi Solar Facility. **Action(s)** - Provide a CIA for each key environmental factor that includes consideration of the direct and indirect impact of other existing and foreseeable proposals (for example, the power transmission infrastructure related to this proposal). See Section 16(e) Cumulative environmental impacts of development in the Pilbara region | EPA Western Australia (2014). - Include a separate CIA section as per the ERD Template, which can include a summary if cumulative impacts are assessed under the key environmental factors. - Include a figure which shows the location of existing and foreseeable proposals considered in the CIA.
1f	Assessing significance of residual impact	**Action(s):** - Reassess the significance of residual impacts (direct, indirect, and cumulative) the proposal is likely to have on key environmental factors in a local and regional context. For guidance on what the EPA may have regard to in its consideration of 'significance' refer to the EPA's 'Statement of environmental principles, factors, objectives and aims of EIA' (EPA, April 2023). The assessment must consider all values with the potential to be impacted, and therefore extends to values outside the indicative disturbance footprint unless the values are protected within defined exclusion zones (see item 2a). - If significant residual impacts are likely, provide details of proposed offsets which can be detailed in the 'offsets' section of the ERD Template (see item 10a).
1g	Assessing environmental outcomes	**Action(s):** - Revise the proposed environmental outcomes in the RSD to conform with the guidance in the EPA's 'Interim Guidance – Environmental outcomes and outcomes-based conditions' (EPA 2021). In doing so, please note the difference between predicting a residual impact and proposing an environmental outcome. Environmental outcomes that have been appropriately formulated, enables the EPA to assess whether the proposal can be implemented to be consistent with the *Environmental Protection Act 1986* (EP Act) principles and with the EPA objectives for relevant environmental factors. - Where environmental outcomes are proposed, proponents should include details about whether and how

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		proposed environmental outcomes can be assured by conditions or other statutory decision-making processes.
1h	Environmental Management Plans (EMPs)	The RSD references the following EMPs: - Construction Environmental Management Plan (CEMP). - Decommissioning and Rehabilitation Plan. - Preliminary Bird and Bat Management Plan (included as Attachment 5). - Surface Water Management Plan. - Cultural Heritage Management Plan. **Action(s):** - Demonstrate application of the EPA's mitigation hierarchy, prioritising the avoidance of impacts to environmental values and achievement of positive environmental outcomes in the first instance. In deciding whether to prepare EMPs, proponents should note the EPA's preference is for outcomes-based conditions rather than EMPs. - EMPs should follow the framework outlined in the EPA's 'Instructions – How to prepare Environmental Protection Act 1986 Part IV environmental management plans (EPA 2024) (EPA's EMP Guidelines). Where the EMP relates to MNES, the plan should also give regard to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) 'Environmental management plan guidelines' (DCCEEW 2024) (DCCEEW's EMP Guidelines), rationalising any differences/contradictions and justifying the approach taken.

1i	Rehabilitation and decommissioning	The RSD includes a commitment to rehabilitate temporary disturbance areas (approximately 735.7 ha) following construction, however, does not detail the approach. Furthermore, the RSD does not include information on the decommissioning phase of the proposal.
		Action(s):
		- Provide further information on proposed rehabilitation and decommissioning. Consider how the following aspects might shape the proposed approach:
		  ○ Aboriginal cultural heritage values (consultation with Traditional Owners).
		  ○ Waste minimisation and circular economy.
		  ○ Tenure relinquishment.
		This information can be included in a Decommissioning and Rehabilitation Plan; however, the revised RSD should provide a summary of the proposed approach.

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1j	Millstream Chichester National Park	Millstream Chichester National Park is an important conservation reserve, containing unusual and outstanding natural values including unique wetlands, a diverse assemblage of flora and fauna, a wide range of intact and varied landscapes of high scenic quality, and important social, cultural and heritage values and uses. The RSD does not adequately assess potential impacts, especially indirect impacts, of the proposal on the Millstream Chichester National Park during construction and operational phases. **Action(s):** - Clearly identify and describe potential impacts (direct and indirect) of the proposal on values and uses of the Millstream Chichester National Park. In undertaking the assessment, consider the strategies, objectives and management actions of the Millstream Chichester National Park and Mungaroona Range Nature Reserve Management Plan No. 69 2011 (DEC 2011). - Justify why new access roads must be constructed within Millstream Chichester National Park, in addition to upgrading the existing track.
2. Proposal		
2a	Spatial data and figures – exclusion zones	The RSD includes a number of avoidance commitments relating to vegetation, flora, significant fauna habitats and Aboriginal heritage values. The delineation of exclusion zones within the proposal DE is recommended where flexibility in the proposal design allows direct impacts to significant environmental values to be avoided. **Action(s):** - Where direct impacts to significant environmental values within the proposal DE can be avoided, apply appropriate exclusion zones to these values where proposal flexibility is not required. - Ensure exclusion zones are demarcated on RSD figure(s) and figure(s) attached to the Proposal Content Document.
2b	Proposal alternatives – water supply	The RSD states the predicted water demand for the proposal is up to 410,000 kL/annum during construction and up to 3,100 kL/annum during the operational phase (of up to 50 years). Since the extent of groundwater held in fractured rock aquifers within the proposal DE is uncertain and remains unconfirmed, further information on alternative water supply options is required. **Action(s)** - Describe alternative water supply options if groundwater investigations determine that water resources available in the proposal DE will not be of sufficient volume, quality or consistency to meet water requirements of the proposal.

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3. Legislative Context		
3a	Environmental impact assessment process	**Action(s):** - Discuss key legislative requirements including Part IV of the EP Act and the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Given that Baru-Marnda Renewable Energy Project (the project) has been determined to be a controlled action under s.75 and s.87 of the EPBC Act and an accredited assessment has been agreed between DCCEEW and the EPA, an update to this discussion is required (see Decision Notice EPBC 2025/10222, dated 8 August 2025).
3b	Other approvals and regulation	**Action(s):** - Provide information on all other decision-making authorities (DMAs), their statutory decision-making processes, and other approvals/licences as per the existing format in Table 4-1 of the RSD. The 'approval required' column must specify which proposal element the approval/licence relates to. - Provide a summary of land tenure within proposal DE including existing zoning, tenements and/or lease types. Confirm the proponent has legal access to the land. Include a figure which shows the boundaries of relevant land tenure.
4. Stakeholder Engagement		
4a	Consultation	Since the proposal has the potential to impact land adjacent to the DE (e.g. visual amenity), meaningful engagement and consultation with neighbouring land holders, land users, Traditional Owners, and visitors is also required. **Action(s):** - Provide evidence of meaningful engagement and consultation with neighbouring land holders, land users, Traditional Owners, and visitors regarding visual amenity impacts of the proposal, including but not limited to the Ngarluma Aboriginal Corporation (NAC). - Update Table 5-2 of the RSD to include any additional consultation undertaken. Information should be provided (where available) on key issues/matters raised, outcomes from consultation, and whether matters raised are resolved or outstanding.
5. Environmental Factors and Objectives: Flora and Vegetation		
5a	Values	Attachment 1 'Detailed Flora and Vegetation Assessment' (Mattiske 2025) discusses the likelihood of P2 Priority Ecological Community (PEC) 'Riparian flora and plant communities of springs and river pools with high water

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		permanence of the Pilbara Region' (Riparian Flora PEC), being present in the proposal DE, however, no further information or analysis has been provided in the report or the RSD. Matiske (2025) notes the presence of species that could be considered phreatophyte in relation to Groundwater Dependent Ecosystem (GDE) indicator species, however, no discussion of the groundwater dependence of these species is provided. **Action(s):** - Provide further information or undertake further investigations to clarify/confirm the presence of the Riparian Flora PEC within the proposal DE, noting this PEC may occur in association with vegetation units C2, C3 and C4. - Conduct additional analysis of species that are/or likely to be a phreatophyte, including groundwater requirements/dependence and association with defined GDEs. - Include a figure showing the mapped extent of PECs including sub-communities if present and any proposed exclusion zones. - Include a figure showing the mapped extent of groundwater dependent vegetation / GDEs and any proposed exclusion zones.
5b	Post-wet season detailed flora and vegetation survey	The RSD notes that a post-wet season detailed flora and vegetation survey of the proposal DE (including site access route) was undertaken in early 2025 but was not included as an attachment. **Action(s):** - Attach the 2025 post-wet season detailed flora and vegetation survey report to the revised RSD. In accordance with EPA's Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment (EPA, 2016), the post-wet season survey should ideally: ○ Include the full extent of the proposal DE including the proposed access route, as well as isolated intersection upgrades. ○ Be undertaken 6-8 weeks after major rainfall between March and June, to detect annual and ephemeral species in the Pilbara IBRA Bioregion. ○ Include vegetation mapping for the proposed access route which aligns with Mattiske (2025) vegetation units (Attachment 1 of the RSD), noting this was not possible during the pre-wet season reconnaissance survey of the access route undertaken by RPS (2025) (Attachment 2 of the RSD). It is expected that the 2025 post-wet season detailed flora and vegetation survey(s) report will confirm:

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		○ Presence/absence of conservation significant species (including DBCA-listed priority flora species) with the potential to occur (locations and counts). ○ Abundance of annual species in the proposal DE. ○ Which sub-communities of PEC 'Four Plant Assemblages of the Wona Land System' are present within the proposal DE. Noting RPS (2025) identified the potential presence of three of the four sub-communities of this PEC within the proposed access route. ○ The distribution of potential GDEs in the proposal DE. - Confirm the adequacy of flora and vegetation surveys undertaken and propose additional survey work if required. - Consolidate flora and vegetation figures in the revised RSD to reflect findings from all flora and vegetation surveys undertaken, including the 2025 post-wet season survey.
6. Environmental Factors and Objectives: Terrestrial Fauna		
6a	Values	A preliminary review of the RSD has identified that further information is required on some aspects of terrestrial vertebrate fauna values. **Action(s)** - Identify all significant terrestrial fauna species that have the potential to be impacted by the proposal. Note the EPA's definition of significant terrestrial fauna species (see Environmental Factor Guideline – Terrestrial Fauna (EPA 2016)) extends beyond threatened and priority species. - Provide further information on conservation significant bird and bat species with potential to be impacted by the proposal: ○ Identify seasonal and daily flight paths (including pathways used by migratory species). ○ Assess spatial patterns in the landscape giving regard to key habitat features. - Figures: ○ Update Figure 11 (grey falcon observations) and Figure 12 (fork-tailed swift observations) of the RSD to reflect new information gathered (or locations surveyed) during ongoing bird and bat surveys. ○ Map potential habitats for at-risk significant fauna (including volant and non-volant species) within the proposal DE and include recorded location(s) for each species. ○ Map potential habitats for SRE invertebrates within the proposal DE and surrounding areas, if surveys are undertaken, included recorded location(s) for each species.

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6b	SRE Invertebrates	Attachment 4 of the RSD 'Short Range Endemic Desktop Assessment' (Bennelongia, 2024) was not prepared for the proposal and does not assess the potential occurrence of SRE within the proposal DE. The findings and conclusions of this assessment cannot be extrapolated to the proposal. The RSD commits to avoiding direct impacts to the most suitable habitat for SRE invertebrates (vegetation communities C2, C3 and C4). However, other habitats suitable for SRE invertebrates may be present and impacted by the proposal. **Action(s)** - In accordance with the EPA's 'Technical Guidance: Sampling of Short-range Endemic Invertebrate Fauna' (EPA 2016) complete a desktop assessment and risk-based evaluation for SRE invertebrates for the proposal. The 'investigation area' must include the full extent of the proposal DE. The desktop assessment must include mapping of any potential SRE habitat both within the proposal DE and surrounding areas. - If the desktop assessment identifies any restricted habitats or landforms, targeted surveys should be undertaken where potential SRE habitat will be directly impacted.

6c	Baseline surveys	A preliminary review of Attachment 3 of the RSD 'Fauna Assessment Report' (Bamford Consulting Ecologists, 2025), identified that further information is required on the basis that:
		- Methods were not adequate to detect some significant fauna species (e.g. ghost bat – see item 6d).
		- Key habitat features were not adequately described and mapped for some significant fauna species (e.g. Rothschild's rock wallaby, Pilbara olive python, northern quoll).
		Action(s)
		- Provide further information on night parrot to support justification of potential presence / absence of the species within the proposal DE.
		  ○ Map potential night parrot habitat, identifying areas affected by fire and ARU survey locations undertaken.
		  ○ In assessing the potential presence of night parrot in the proposal DE refer to DBCA's Guideline in 6d below. https://www.dbca.wa.gov.au/management/threatened-species-and-communities/resources/threatened-and-priority-fauna-resources
		  ○ If suitable habitat is identified in the proposal DE, ensure acoustic recordings are analysed by a qualified expert experienced in identifying night parrot calls.
		- Identify, describe and map key habitats (breeding, foraging, dispersal areas) for all significant fauna species that are considered residents or regular visitors of the proposal DE. Consider presence of rock piles, caves, crevices,

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		movement corridors (e.g. rocky escarpments, gorges, riparian zones, woodlands), and hunting perches (e.g. Eucalyptus and Corymbia woodlands). - Show survey locations on all terrestrial fauna maps.
6d	Ongoing surveys – birds and bats	It is noted and supported that YEC has committed to conducting additional Bird and Bat Site Utilisation Surveys (BBSUS) during the wet and dry seasons of 2025, as well as throughout the construction and operational phases of the proposal. Refer to the recommendations below when designing and undertaking BBSUS. **Action(s)** - Ongoing BBSUS should consider the requirements outlined in the resources below, as well as new guidance as it becomes available: o DCCEEW's draft Onshore Wind Farm Guidance – Best practice approaches when seeking approval under Australia's national environmental law (May 2024) (or subsequent updated versions, noting a final version of DCCEEW's Onshore Wind Farm Guidance will be published in the coming months). o The Department of the Environment, Water, Heritage and the Arts' (DEWHA's) Survey Guidelines for Australia's Threatened Birds (DEWHA 2017). o DEWHA's Survey Guidelines for Australia's Threatened Bats (DEWHA 2010). o DBCA's 'Guidelines for determining the likely presence and habitat usage of night parrot (*Pezoporus occidentalis*) in Western Australia' (DBCA 2024) available from here. - BBSUS should: o Target at-risk bird and bat species, migratory bird species, and associated habitats (e.g. roosting and nesting sites). o Confirm the movement of species within, into and out of the proposal DE, and the resources they use and require (e.g. foraging, roosting, breeding/maternity sites). o Confirm short-term (day/night foraging) and long-term (seasonal migration) movement patterns. o Be undertaken over at least 24 months capturing each season (8 survey events). o The duration and spatial coverage of each survey event must be adequate to evaluate site utilisation by at-risk species. o Record temperature and wind speed in addition to other environmental variables during each survey event.

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		- Potential roosting caves should be visually inspected by experienced/qualified personnel. Document cave dimensions (e.g. overhangs, entrances, ceiling height, chamber size) with photographs. - If caves are suitable for roosting by ghost bat and/or Pilbara leaf-nosed bat, ARUs should be placed at cave entrances for surveillance. - Conduct targeted surveys for ghost bat during breeding season (September to April), and over multiple seasons/years. If ghost bats are not detected via ARUs placed at cave entrances, the use of acoustic lures (with video recording devices) may assist in detecting individuals in foraging or dispersal habitats outside of potential roosting caves.
6e	Collision and exposure risk modelling	Curtailment limits may be set higher in the absence of adequate data and modelling; therefore, it's recommended that Collision Risk Modelling (CRM) or Exposure Risk Modelling (ERM) (which includes CRM) is undertaken for significant bird and bat species that are likely to be impacted by the proposal. **Action(s):** - Undertake CRM or ERM for significant bird and bat species that are likely to be impacted by the proposal. If CRM or ERM is not undertaken for an at-risk species, provide justification as to why this modelling is not considered necessary. - Ensure the CRM/ERM incorporates seasonality, weather patterns, and species' behavioural responses (e.g. flight height above ground level, direction, patterns, and behaviour under varying wind speeds and weather conditions). Collect data required to inform the CRM/ERM during surveys/monitoring. - Ensure the CRM/ERM is based on reasonable assumptions to classify risk over the operational lifespan of the proposal. - Specify a timeframe for validation and revision of the CRM/ERM using post-construction monitoring data. - Confirm data inputs and sources to the CRM/ERM and state all assumptions and uncertainties.
6f	Avoidance and minimisation measures	The proposed avoidance and minimisation measures does not adequately consider the latest evidence-based research (especially for birds and bats). **Action(s):** - Consider the latest evidence-based avoidance and minimisation measures (and citing the research) when applying the mitigation hierarchy to the proposal. If known evidence-based measures will not be implemented, justify why these measures are not considered suitable. - Avoidance and minimisation measures for birds and bats should be informed by the outcomes of BBSUS, CRM/ERM and post-construction monitoring.

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		- If suitable habitat for *Pezoporus occidentalis* (night parrot) is confirmed to be present and will be directly impacted by the proposal and/or night parrot calls are identified from acoustic recordings, include a requirement for exclusion zones, pre-clearance surveys or contingency actions.
6g	Bird and Bat Management Plan	A preliminary Bird and Bat Management Plan (BBMP) (Coterra 2025) was provided as Attachment 5 to the RSD. **Action(s)** - Update the BBMP in consultation with DWER Green Energy directorate and DBCA. - As per item 1h, the BBMP should be prepared in accordance with the EPA's EMP Guidelines and should give regard to DCCEEW's EMP Guidelines, rationalising any differences/contradictions and justifying the approach taken. Ensure the BBMP adopts DCCEEW's language and terminology preferences. - Ensure the BBMP scope includes non-conservation significant bird and bat species (as well as conservation significant species) that have the potential to be impacted by the proposal (e.g. white-striped free-tailed bat and Gould's wattled bat). - Define specific, measurable environmental outcomes to be achieved through BBMP implementation. - Objectives and outcomes should be underpinned by a robust, long-term approach to monitoring, data analysis, and adaptive management, ensuring that both impact avoidance and continuous improvement are embedded in BBMP implementation. - Include commitments to monitor, manage and report on collision risk and behavioural changes on significant bird and bat species, and to adaptively implement additional measures as needed to achieve the BBMP objectives. - Define impact triggers for initiating adaptive management responses (i.e. the implementation of additional or alternative mitigation measures). - Provision of environmental offsets, to be implemented if impact thresholds are exceeded. - Provide further detail on post-construction mortality monitoring protocols necessary to supporting adaptive management. - Provide further details on the methodology and protocols for carcass surveys (i.e. detectability trials and persistence trials). - Reporting commitments should include annual turbine strike reports, annual mortality rate estimates (for relevant species) and species occurrence records. Species occurrence should be recorded as per the requirements of 'Guidelines for biological survey and mapped data' (Government of Australia 2018). All reporting commitments should have clearly defined reporting intervals.

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		- Provide further details on proposed adaptive management responses should impact triggers be met. The adaptive management framework must, at a minimum:
		  ○ Clearly demonstrate the linkages between environmental outcomes, implementation of mitigation and management measures, monitoring, reporting and investigations, and implementation of corrective actions to ensure environmental outcomes are achieved.
		  ○ Incorporate site-specific data collected through ongoing monitoring activities and take into account changes to turbine risk ratings based on the CRM/ERM.
		  ○ Include a table of species-specific trigger levels with the corresponding management and corrective measures to be implemented if those triggers are exceeded.
		  ○ Commit to assign higher risk profiles to individual turbines for listed species if fatalities exceed predictions.
		  ○ Corrective actions to be implemented (and timeframes) if monitoring indicates environmental outcomes have not been achieved.

6h	Direct and indirect impacts	**Action(s):**
		- Assess potential impacts (direct and indirect) to significant terrestrial fauna, including DBCA-listed priority fauna species and other species considered significant according to the EPA's definition. Give regard to any new findings from ongoing surveys or new assessments completed.
		- Consider the direct and indirect impacts of the proposal on microhabitats within the proposal DE (e.g. caves, gorges, dense vegetation patches, permanent water bodies/pools) and how this might impact significant fauna species that use these microhabitats.
		- Consider how changes to surface water quality and flows might impact species that inhabit riparian vegetation.
		- In assessing potential impacts on birds and bats consider:
		  ○ The risk of displacement or barrier effects and resulting behavioural responses.
		  ○ The flight height of Pilbara leaf-nosed bat and ghost bat during dispersal events between roosting sites, and evaluate the risk of collision with the turbines during these events.
		  ○ The risk of bat attraction to turbines causing an altered flight height.
		  ○ The potential use of caves within the proposal DE by Pilbara leaf-nosed bat and ghost bat as temporary roosts when moving between preferred roosting sites.

7. Environmental Factors and Objectives: Subterranean Fauna		

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7a	Desktop assessment and survey(s)	Attachment 6 'Hydrology and Hydrogeology Assessment' (Pentium Water 2025) states that the "prevalence of stygofauna in the local area is largely unknown" (Section 5.2.1) but potential stygofauna habitat is present "fractured rock and alluvial aquifers" (Section 4.2), and the southern portion of the proposal DE is predicted to have "moderate potential" for GDEs (Figure M). Due to the presence of potential stygofauna fauna habitat within the proposal DE, and the potential for the proposal to impact stygofauna through groundwater abstraction, further information is required. **Action(s)** - Undertake a subterranean fauna desktop study and habitat assessment in accordance with the EPA's 'Technical guidance – Subterranean fauna surveys for environmental impact assessment' (EPA, December 2021) and attach the report to the RSD. The assessment must be undertaken by suitably qualified consultants with expertise in subterranean fauna. Figure 1 of the Technical Guidance provides a flow chart for determining the level of subterranean fauna assessment/survey required. As described in the guidelines (pg.3), *"The basis for evaluating the likelihood of subterranean fauna habitat and species occurrence should be clearly stated with supporting evidence. Subjective, generic or poorly supported conclusions are unlikely to be sufficient justification for not undertaking survey."* - If the subterranean fauna desktop assessment determines that a survey is required, undertake the appropriate survey type (basic, detailed, targeted) in accordance with the EPA's 'Technical guidance – Subterranean fauna surveys for environmental impact assessment' (EPA, December 2021). As described in the guidelines (pg.7), *"A basic survey is required where there is a lack of information or uncertainty in the available data examined through the desktop study, or when the outcome of the desktop study is inconclusive in determining whether subterranean fauna or habitat is likely. A paucity of records is often due to limited sampling effort and does not indicate a lack of subterranean fauna in an area, unless equivalent habitats in the surrounding area have been well sampled and were found to support low communities of fauna."* - If a subterranean fauna survey is undertaken, include figure(s) in the revised RSD showing sampling locations and records.
8. Environmental Factors and Objectives: Inland Waters		
8a	Values	**Action(s):** - Characterise the known and potential occurrence of pools and springs across the proposal DE. Identify occurrences within and outside the mapped extent of GDEs (inc. the Riparian Flora PEC), along surface water

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		courses (inc. Western Creek and Maitland River and their tributaries). Describe water regimes, ecohydrology and connection to groundwater. - Include figure(s) in the RSD identifying all inland water values present in the proposal DE, mapped against the indicative disturbance footprint. Include mapping of persistent pools (semi-permanent; permanent) and springs. Ensure inland water values are labelled. - Confirm if fractured rock (or other) aquifers targeted for water supply have the potential to interact with alluvial aquifers, pools/springs, or surface waters. Ecohydrological conceptual models can assist with illustrating the mode of occurrence of pools and springs, and identifying potential risk pathways. - Confirm all known and potential users of aquifer(s) targeted for water supply. Consider the cumulative water demand of the proposal in combination with these users. - Determine the volume of water available in aquifer(s) targeted for water supply and whether the supply will meet predicted water needs of the proposal (taking into consideration other users). If the volume of water is determined to be insufficient, identify alternative water supply sources and the volume of water available from these sources.

8b	Hydrological and hydrogeological investigations	A preliminary review of Attachment 6 of the RSD 'Hydrology and Hydrogeology Assessment' (Pentium Water 2025) identified that further information is required to accurately assess the potential impacts to inland waters (and associated values).
		Action(s)
		- Provide designs for all proposed creek crossings, supported by calculations to demonstrate they are appropriately sized to convey the predicted flows. If erosion protection is required, describe the design standard that will be adopted.
		- Provide further information on hydrogeological conditions and effects of groundwater abstraction in the revised RSD, undertaken further investigations and updating the Pentium Water (2025) assessment if required:
		  ○ Describe the presence, yield and hydrogeological parameters of the aquifer(s) targeted for water supply.
		  ○ Identify the potential connectivity between aquifer(s) targeted for water supply and:
		  ▪ alluvial aquifers, pools (permanent; semi-permanent), springs and surface waters.
		  ▪ the Harding Dam Public Drinking Water Source Area (PDWSA).
		  ○ Identify the likely location/distribution of groundwater abstraction wells.
		  ○ Predict the extent of groundwater drawdown (cone of depression) for an individual well giving regard to hydrogeological conditions (e.g. fractured rock aquifers vs alluvial aquifers).

Item		Requested additional information
		○ Assess the potential interception of turbine foundations with aquifers and the need for dewatering (and management of dewater) during construction. - Provide further information on hydrological conditions and flood risk in the revised RSD, undertaking further modelling and updating the Pentium Water (2025) assessment if required: ○ Ensure hydrological modelling and/or the impact assessment can demonstrate the likely impact to hydrological regimes from implementation of the proposal. The assessment must: ▪ Account for construction and post development phases of the proposal. ▪ Consider the potential impact of constructing creek crossings and any changes to the permeability of surfaces. ○ Confirm assumptions/methods used for Hydrologic Engineering Centre River Analysis System (HEC-RAS) modelling: ▪ The delineation of sub-catchments. ▪ Routing and loss parameters adopted, including the initial and proportional loss values, in addition to the method used. Refer to current industry guidelines for flood estimation 'Australian rainfall and runoff – A guide to flood estimation' (Geoscience Australia 2019). ▪ The method used for design simulation (e.g. spatial rainfall variation, areal rainfall reduction, temporal patterns, loss model, any sample methodology such as monte carlo analysis etc.) and provide a summary of the results. ▪ The method used to calculate and distribute effective rainfall (design rainfall minus losses), the manning's coefficients, and boundary condition for the Hydrologic Engineering Centre River Analysis System (HEC-RAS) model. ▪ Scaling of available gauging station data (flood frequency analyses) and how they compare to the peak gauged flows (and flood frequency) by areally scaling using the following formula: Qcatch = Qgauge x (Acatch / Agauge) ^0.7. ○ Provide results of the RunOff Routing on Burroughs (RORB) modelling to demonstrate similarity in results generated by the RORB model compared with the HEC-RAS model. ○ Calibrate / validate RORB and HEC-RAS models: ▪ Using available streamflow gauging information (i.e. stations 709002 and 709007, and if available Main Roads WA data), estimating design flows within the area of interest.

Item		Requested additional information
		▪ Estimate the peak flows using the method developed by Flavell for the Pilbara area of Western Australia, as documented in Flavell, D. 2012, Design Flood Estimation in Western Australia, Australian Journal of Water Resources, 16(1), 1-20). Compare the results of the RORB and HEC-RAS modelling to the results of the Flavell method. ○ Discuss the level of uncertainty in RORB and HEC-RAS model estimates to provide a better understanding of the associated flood risk.
8c	Direct and indirect impacts	The RSD does not adequately assess potential impacts to inland waters values. **Action(s)** - Update the assessment of potential impacts (direct and indirect) to inland waters values, to include consideration of: ○ Potential impact of proposal on hydrological flows, flood risk and quality of surface waters. ○ Potential impact of groundwater drawdown (from groundwater abstraction) on: ▪ Alluvial aquifers, pools/springs, surface waters; and associated values (inc. groundwater dependent vegetation and GDEs including stygofauna if present). ▪ Harding Dam PDWSA. ▪ Other water users. Any conclusion of 'no likely impact' must be justified with evidence. ○ Consider the minimum separation distance required between groundwater abstraction wells and the mapped extent of groundwater dependent vegetation and GDEs, to ensure the cone of depression from drawdown does not impact these values. In undertaking this assessment, give regard to the groundwater requirements/dependence of phreatophyte species associated with defined GDEs. ○ Potential impacts of taking water from alternative water supply sources (if determined to be required).
8d	Application of the mitigation hierarchy	The RSD notes that groundwater abstraction wells will be located away from both the Harding Dam PDWSA and groundwater dependent vegetation. However, Attachment 6 (Pentium Water 2025) maps prospective areas for groundwater drilling, which appear to overlap with the mapped extent of riparian vegetation and GDE Riparian Flora PEC (Attachment 1, Mattiske 2025). **Action(s)**

Item		Requested additional information
		- When establishing exclusion zones (refer to item 2a) consider delineating an exclusion zone for groundwater abstraction wells to ensure the cone of depression from groundwater abstraction does not overlap with the mapped extent of groundwater dependent vegetation. - Describe how proposal infrastructure (especially creek crossings) has been designed to maintain hydrological flows, and measures that will be implemented to minimise erosion and sedimentation impacts to surface waters. - Develop a monitoring and response action programme for surface water in the proposal DE, consider: o Suitable locations for routine water and sediment quality monitoring based on findings of the Pentium Water (2025) assessment. Explain why each location was chosen and provide a figure that shows these locations. For further information on physio-chemical parameters see 'Information guidelines explanatory note - deriving site-specific guideline values for physico-chemical parameters and toxicants' (Huynh & Hobbs 2019). o Inspections following high flow events to confirm infrastructure is appropriately sized / intact, and to assess erosion / sedimentation impacts. If preferred monitoring, impact triggers and adaptive management response can be detailed in a Surface Water Management Plan. - Describe how proposal infrastructure interacting with surface and groundwater resources will be decommissioned and rehabilitated (see item 1i).
9. Environmental Factors and Objectives: Social Surroundings		
9a	Aboriginal Cultural Heritage	The proposal DE intersects 11 registered sites and 6 lodged places, with the indictive disturbance footprint intersecting the boundary of registered Aboriginal heritage site 'Powerline survey 087' (ID 10894). YEC is currently in the process of undertaking detailed heritage surveys across the proposal DE in collaboration with Yindjibarndi Aboriginal Corporation (YAC) and Yindjibarndi Ngurra Aboriginal Corporation (YNAC) representatives and in accordance with the endorsed Indigenous Land Use Agreement (ILUA) and Heritage Protection Agreement (HPA). Additional Aboriginal heritage may be identified during these surveys. Any disturbance to Aboriginal heritage values would require approval under the *Aboriginal Heritage Act 1972* (AH Act). **Action(s)** - Undertake Aboriginal cultural heritage survey(s) of the proposal DE (note: the survey extent must include the full extent of the DE and the isolated intersection upgrades).

Item		Requested additional information
		- Consult with the Department of Planning Lands and Heritage (DPLH) regarding the provision of updated Aboriginal heritage information from the surveys conducted and to identify any approvals required under the AH Act (see also 4c). - In assessing direct and indirect impacts to Aboriginal cultural heritage values consider outcomes of the Aboriginal cultural heritage survey(s) and the EPA's Technical Guidance 'Environmental impact assessment of Social Surroundings – Aboriginal cultural heritage' (November 2023). Include an assessment of potential indirect impacts to Aboriginal heritage values outside the proposal DE, for example: o Culturally significant rivers, pools (permanent; semi-permanent) and springs. o Aboriginal heritage values of the Millstream Chichester National Park. o Visual amenity impacts to the Lore Ceremony and Weymul Community. o Visual amenity impacts to adjacent Aboriginal cultural landscapes (including potential disruption to navigation of Aboriginal people through their lands).
9b	Amenity (Noise)	A preliminary review of Attachment 7 – Sonus Noise Impact Assessment (Sonus NIA) and the Yindjibarndi Wind Farm noise model (dated August 2025) notes the following: - The Sonus NIA provides two separate noise impact assessments (NIAs): S8467C1 'Baru Project' and S8467C2 'Marnda Project'. - The predicted noise levels at sensitive receivers does not account for cumulative noise generated from S8467C1 'Baru Project' and S8467C2 'Marnda Project'. - The predicted noise level at the Nguarrawaana community assumes the generator will continue to run for the duration of the proposal life. **Action(s)** - Since the predicted noise level is 33 dB(A) at the closest noise sensitive receiver (the Nguarrawaana community) which is just below the assigned noise limit of 35 dB(A) for '*noise sensitive premises: highly sensitive area'* under the WA Environmental Protection (Noise) Regulations 1997 (Noise Regulations) (Table 1 of regulation 8), the revised RSD must: o Describe how the mitigation hierarchy has been applied to minimise noise impacts to noise sensitive receivers (especially the Nguarrawaana community). o Consider the potential cumulative impact of modulation on predicted noise levels at sensitive receivers. o Propose how YEC will ensure turbines are free of excessive levels of tonality and/or impulsiveness (e.g. maintenance routines).

Item		Requested additional information
		○ Propose how YEC intend to verify noise levels generated by key proposal infrastructure and actual noise levels at sensitive receivers (i.e. what post-construction noise monitoring is proposed). The influence of seasons and time of day should be considered. ○ Propose adaptive management measures to further minimise noise impacts if noise complaints are received. ○ Consider alternative power supply options for the Nguarrawaana community other than the existing diesel generator (e.g. Battery Energy Storage System), how this would affect background noise levels and masking of noise generated by the proposal; and what additional noise minimisation measures are available if noise levels exceed 35 dB(A) and/or complaints are received by the community. - Ensure the noise impact assessment reports provide all the details relevant to noise modelling undertaken including, but not limited to: ○ Ground absorption used as G coefficient. ○ Locations and height of noise sources (including Easting and Northing coordinates). ○ Sound power level data from the manufacturer for all sources. - When assessing noise impacts in the revised RSD, ensure terminology is consistent with the WA Noise Regulations (i.e. use of 'noise sensitive premises' rather than 'associated receivers'). - Describe any amenity (noise) concerns arising from the social impact assessment or consultation undertaken and how these are being addressed.
9c	Amenity (Visual)	Attachment 8 of the RSD 'Visual Impact Assessment' (Ecoscape 2025) appears comprehensive and in accordance with current published guidelines (based on a preliminary review), however, further information on the assessment approach and outcomes is required in the revised RSD. **Action(s)** - Include further information from the Ecoscape 2025 report describing the visual impact assessment approach and outcomes in the revised RSD. - Justify locations selected by Ecoscape 2025 for photo montage analysis, and which locations are at variance to the visual management objectives of the assessment. - Describe any amenity (visual) concerns arising from the social impact assessment or consultation undertaken and how these are being addressed.
10. Offsets		

Item		Requested additional information

10a	Significant residual impacts and offsets	As per the RSD, the proposal requires clearing of up to 4,986.4 hectares (ha) of native vegetation in predominately excellent condition, which provides habitat for significant fauna species. Despite the commitment to rehabilitate temporary disturbance areas following construction, it is considered that there may still be a significant residual impact.
		Action(s)
		- Identify and quantify significant residual impacts of the proposal on flora and vegetation and terrestrial fauna in the revised RSD.
		  ○ Complete the *offset template* (see example in Appendix 1 of the WA Environmental Offsets Guidelines) available at DWER's Environmental Offsets page.
		  ○ Complete the *residual impact significance model table* (see example on Page 11 of the WA Environmental Offsets Guideline) available at DWER's Environmental Offsets page.
		- If significant residual impacts are identified, determine suitable offsets for the proposal which may include contributions to the Pilbara Environmental Offset Fund (PEOF) and/or design and funding of research, revegetation or rehabilitation project(s) that would contribute to improved environmental outcomes for environmental values where significant residual impacts are expected. It is recommended that YEC initially consults with DWER regarding PEOF, to identify if there are suitable offset opportunities available through the fund.
		  Environmental matters accommodated under PEOF which the proposal will impact (and where significant residual impacts are possible) include, but are not limited to:
		  ○ Good to excellent vegetation which is also habitat for conservation significant fauna
		  ○ Good to excellent vegetation
		  ○ Riparian vegetation
		  ○ Ghost bat foraging habitat
		  ○ Northern quoll foraging habitat
		  ○ Pilbara leaf-nosed bat foraging habitat
		  ○ Pilbara olive python habitat.
		  Refer to Table 1 and Table 2 of the Pilbara Environmental Offsets Fund Implementation Plan for further information.
		- Whatever offset approach is pursued by YEC, the following additional information must be included in the revised RSD:

Item		Requested additional information
		○ Demonstrate consideration of the six principles outlined in the WA Environmental Offsets Policy and WA Environmental Offset Guideline. ○ Demonstrate consideration of the Commonwealth '*Environment Protection and Biodiversity Conservation Act 1999* Environmental Offset Policy' (Government of Australia 2012). ○ Assess whether and how the proposed offset will counterbalance the significant residual impact, having regard to the EPA's 'Public Advice – Considering Environmental Offsets at a Regional Scale' (EPA, 2024). YEC must provide sufficient evidence about and assess whether (and how) an offset is likely to counter-balance a significant residual impact. ○ Outline how the offset aligns with relevant plans and policies, such as recovery plans. ○ Provide evidence that supports the success or viability of the offset. - If contributions to the PEOF are proposed to offset significant residual impacts in part, or full, provide an Impact Reconciliation Procedure (IRP) as an attachment to the revised RSD. The IRP, including the relevant spatial data, must be prepared in accordance with Instructions: Preparing Impact Reconciliation Procedures and Impact Reconciliation Reports (or any subsequent revisions). - It is recommended that DBCA be consulted regarding offsets that relate to significant residual impacts to matters relevant to the *Conservation and Land Management Act 1984* and/or *Biodiversity Conservation Act 2016*. - It is recommended that DCCEEW be consulted regarding offsets that relate to significant residual impacts to matters listed under the EPBC Act.
11. Matters of National Environmental Significance		
11a	MNES	The project was determined to be a controlled action under s.75 and s.87 of the EPBC Act on the 8 August 2025 (see Decision Notice EPBC 2025/10222). The controlling provisions were: - Listed threatened species and communities (sections 18 and 18A of the EPBC Act) - Listed migratory species (sections 20 and 20A of the EPBC Act). As the project will be assessed by accredited assessment as agreed between DCCEEW and the EPA, an MNES section is required in the revised RSD as per the ERD Template.