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Dear Phil

RE: RPI25/002: Anglo American – Planet Downs Project (Exploration Drilling) Response to Requirement Notice of 27 February 2025

This document provides information to support the Application for a Regional Interests Development Approval (RIDA) (application reference RPI25/002) (the RIDA Application) for the activities proposed by Anglo American Exploration (Australia) Pty Ltd (Anglo) (the Proponent) within the Gulf Rivers Strategic Environmental Area (SEA) for the Planet Downs Project (the Project).

This document has been prepared by Umwelt (Australia) Pty Ltd (Umwelt) on behalf of Anglo, and provides a response to the Requirement Notice (reference D25/28600, dated 27 February 2025) provided by the Department of State Development, Infrastructure and Planning (DSDIP) for the Project. This response should be read in conjunction with the Assessment Application Form for RPI25/002 (the RIDA Application Form) and the RPI25-002 Anglo American – Planet Downs Project RIDA Application: Supporting Information Report (the Supporting Report).

All exploration activities proposed in the RIDA Application will be conducted in compliance to the Project's Environmental Authority (EA) (P-EA-100269946) and with any additional conditions that may be imposed in the RIDA.

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1.	***Potential erosion and sedimentation*** ***Issue:*** *Limited information has been provided regarding potential erosion and sedimentation from the proposed exploration activities (drilling, temporary access tracks, campsite, and laydown area), including potential impacts during the wet season. Furthermore, the area of interest is susceptible to flooding in accordance with the Queensland Floodplain Assessment Overlay mapping. Limited information has been provided on the impacts of flooding of the proposed infrastructure to the strategic environmental area (SEA) and designated precinct.* ***Actions:*** *Please take the following action:* • *Provide a comprehensive assessment on the erosion and sedimentation potential of the exploration activities considering impacts from the wet season. This assessment must include mitigation strategies and erosion/sediment control measures proposed to be implemented to ensure sensitive receptors (such as the designated precinct and SEA) are not adversely affected. Furthermore, information is required to demonstrate the water quality of the area will not be altered due to the proposed activities.* • *Provide an assessment of the potential impacts of flooding to ensure that water quality is not adversely affected.*
	Response: ***<u>Erosion and Sediment Control</u>*** The Project's EA includes the following conditions relevant to erosion and sediment control for the activities proposed as a part of this RIDA application, which Anglo must adhere to: *A5: The holder of the environmental authority must design, install and maintain adequate banks and/or diversion drains to minimise the potential for storm water runoff to enter disturbed areas.* *A6: The holder of the environmental authority must design, install and maintain adequate erosion and sediment control structures wherever necessary to prevent or minimise erosion of disturbed areas and the sedimentation of any watercourse, waterway, wetland or lake.* *A7: The holder of the environmental authority must ensure that topsoil is removed and stockpiled prior to carrying out any mining activity. Prevent or minimise the mixing and erosion of topsoil and overburden stockpiles.* *B2: When constructing new roads and tracks, the holder of the environmental authority must ensure that the area and duration of disturbance to land, vegetation and watercourses is minimised.* *B28: The holder of the environmental authority must rehabilitate areas disturbed by mining activities to a stable landform similar to that of surrounding undisturbed areas.* *B29: The holder of the environmental authority must spread seeds or plant species that will promote vegetation of a similar species and density of cover to that of the surrounding undisturbed areas or vegetation that is appropriate for providing erosion control and stabilisation of the disturbed areas.* It should be noted that all conditions of the Project's EA, including those noted above, are designed to protect and safeguard sensitive environmental areas, which includes the SEA. At all times, Anglo's activities will be conducted in compliance with all conditions of the Project's EA, and any additional conditions imposed by the RIDA.

Drilling Activities

As stated in the Supporting Report, drilling activities including associated clearing will only occur in the dry season. Clearing of the drill pads (which will be approximately 30 m x 30 m in size) will be undertaken as soon as practically possible prior to activities taking place, to minimise the time that soil is left exposed to limit erosion potential. Sites will be selected on relatively flat topography, and in areas that minimise the amount of vegetation that may need to be cleared. Riparian vegetation, mature trees will be avoided, and no clearing is proposed within 100 m of mapped waterways or wetlands. Topsoils and any materials excavated from the construction of the sumps will be stockpiled on the drill pad in accordance with Condition A7 of the EA.

Erosion and sediment controls will be installed on the drill pads to ensure that any runoff, including from stockpiles, is appropriately managed and contained. Controls will be designed to minimise soil erosion from wind, rain and runoff, and to allow stormwater to pass through or around the site in a controlled manner, in compliance with Conditions A5 and A6 of the EA.

The proposed drilling activities are small scale and temporary in nature. Each drill hole will take approximately one to four weeks to drill depending on drilling depth and ground conditions.

Prior to the commencement of the wet season (which in this region typically occurs from December to March), the drill rig and all drilling equipment will be demobilised off site. All constructed drill holes will be decommissioned, appropriately capped, and rehabilitated in accordance with the EA including Conditions B16 to B20. The drill pads will be rehabilitated to return the drill pad to its pre-disturbed state and to a stable landform similar to that of the surrounding undisturbed areas, in accordance with Condition B28 of the EA. This will include the respreading of topsoils to facilitate natural regeneration of vegetation to maintain compliance with Condition B29 of the EA, and reduce erosion potential of the rehabilitated drill pad.

The requirement for any additional erosion and sediment controls will be assessed by the Project team at the time of construction of the drill pad and drill holes, during drilling, and prior to rehabilitation activities, to ensure full compliance with the EA, including EA Conditions A5 to A7.

The drill pads are very small in size (approximately 30 m x 30 m), and are located on two large cattle stations, Yeldham Station and Gregory Downs Station, that both support a large head of cattle. There are large areas of these cattle stations that are already cleared for farming activities. The construction and use of the drill pads will not significantly impact the water quality values in the region during flood events, beyond what is already experienced from the existing cleared farm areas.

The drilling activities, which will have a total disturbance footprint of approximately 1 ha, will not create an erosion or sedimentation risk that will affect water quality or impact the functioning or environmental attributes of the SEA. The drilling activities will not result in a widespread or irreversible impact on any environmental attributes of the SEA.

Temporary Access Tracks

The temporary access tracks will be constructed within the proposed drilling areas (shown in Figure 2 of the Supporting Report) to link existing tracks to the proposed drill pad. As the exact location for the construction of the drill pads within the proposed drilling areas is unknown at this stage (refer to Section 2.1 of the Supporting Report), it is not possible to provide an exact location or alignment for the proposed temporary access tracks. However, it is estimated that approximately

8 km of temporary access tracks, that are up to 3 m in width, may be required to be constructed. The tracks will be cleared and utilised during the dry season.

There are a large array of existing permanent sealed roads, permanent unsealed roads, and permanent unsealed access tracks that currently traverse both the Gulf Rivers SEA and Designated Precinct, particularly in the vicinity of the proposed drilling areas. The proposed drilling areas are located on two large cattle stations, Yeldham Station and Gregory Downs Station, that both support a large head of cattle. The proposed access tracks in the drilling areas will be aligned to connect with existing permanent farm tracks to reduce the clearing required.

The proposed access tracks are temporary in nature and will only be used for a very short period of time. Each drill hole will take approximately one to four weeks to drill depending on drilling depth and ground conditions. During this time, heavy equipment such as the drill rig, will only traverse the tracks when travelling to the drill site, and following completion of drilling at that site. The drilling crew will arrive on site in light vehicles such as 4WDs, returning to the camp at the end of each shift.

The tracks will be created to follow the natural grade of the topography and will be constructed along ground level. **Plate 1** provides an example of an access track that is typical for a Project of this nature.

Plate 1 Example of an Access Track that is Typical of a Project of this Nature

Track construction will be undertaken using equipment such as a grader, backhoe, front end loader or similar. Once cleared, the proposed tracks will be left in their natural state, and will not be sealed, coated, or treated in any way. The tracks will not require any cut and fill earthworks and will not be raised above ground level. Whilst the tracks may need to traverse Sandy Creek, it should be noted that Sandy Creek is ephemeral, and activities in this area will take place during the dry season when the creek is dry and there are no flows. The tracks will not require the construction of any culverts or bridges, and will not involve construction in any waterways. Further information of the waterway crossing points is provided in Section 3.8.1 of the Supporting Report.

To maintain compliance with EA Condition B2, tracks will only be cleared if absolutely necessary, and any clearing is expected to only be light clearing of vegetation, to allow for the safe travel of Project vehicles (4WDs and drill rig) through the area and to facilitate the drilling program. In most instances, and given the sparse nature of the vegetation in the area, it is expected clearing will not be required along the full length of the tracks proposed as a part of this RIDA Application. Clearing of mature trees, shrubs and riparian vegetation will be avoided, and ground vegetation will be retained wherever possible to further reduce any risk of erosion. Where clearing is necessary, tracks will be cleared by applying the "blade up" method to minimise disturbance to topsoil and the roots of trees and shrubs. Any soils that may be cleared during construction of the tracks will be stockpiled in windrows adjacent to the tracks.

The activities will be undertaken over the dry season, do not involve regular use of the tracks, and therefore the activities are highly unlikely to cause any issues with soil compaction or rutting of the tracks. Regrading of the proposed access tracks is not proposed and is not anticipated to be required.

The tracks will be rehabilitated to a stable landform similar to that of the surrounding undisturbed areas at the completion of exploration activities, in accordance with Condition B28 of the EA. Rehabilitation activities will occur following completion of exploration drilling, and prior to the commencement of the wet season. Tracks no longer required will be rehabilitated in accordance with the conditions in the Project's EA, any conditions imposed by the RIDA, and to the satisfaction of the landowner.

The temporary tracks will be constructed, utilised, and rehabilitated during the dry season, and erosion and sediment controls for the temporary tracks are therefore not anticipated to be required. The requirement for any erosion and sediment controls will be assessed by the Project team at the time of construction, during use of the tracks, and prior to rehabilitation activities, to ensure full compliance with the EA, including EA Condition A6.

Further, the proposed tracks are similar to the large number of existing, permanent unsealed tracks in the area, and the construction and use of the temporary tracks will not significantly impact the water quality values in the region during flood events, beyond what is already experienced from the existing permanent tracks.

The access tracks, which will have a total disturbance footprint of approximately 2.4 ha, will not create an erosion or sedimentation risk that will affect water quality or impact the functioning or environmental attributes of the SEA. The access tracks will not result in a widespread or irreversible impact on any environmental attributes of the SEA.

Temporary Camp Site and Laydown Area

At stated in the Supporting Report, the camp will house approximately 10 staff, and will likely comprise caravan-style accommodation, with temporary ablution and wash facilities also provided. A temporary laydown area will also be required to support the exploration program, which will be co-located adjacent to the accommodation camp. In siting these areas, preference will be made to locate these facilities on flat topography in areas with limited existing vegetation to reduce the need for any ground clearing as far as practical. No clearing is proposed within 100 m of mapped waterways or wetlands.

All activities proposed as a part of this RIDA application will occur in the dry season, and therefore the camp and associated facilities will not be required during the wet season. It is therefore not anticipated that erosion and sedimentation controls will be required to be constructed. However,

	the requirement for any erosion and sediment controls will be assessed by the Project team at the time of construction of the camp and laydown area, during use, and prior to rehabilitation activities, to ensure full compliance with the EA, including EA Conditions A5 and A6. The temporary camp and any structures or consumables associated with the camp and laydown area such as marquees, sun shelters, and core racking, etc will be dismantled and demobilised off site prior to the wet season. As discussed in the response to Items 2 and 3, wastewater, including sewage wastes and greywater, will be appropriately managed in accordance with the waste management requirements of the local council, Anglo's internal waste management procedures, the conditions of the EA, as well as any additional conditions that may be imposed by the RIDA. It is considered unlikely that the construction and operation of the camp and laydown areas will significantly impact the water quality values in the region during flood events. The temporary camp and laydown area, which will have a total disturbance footprint of approximately 0.6 ha, will not create an erosion or sedimentation risk that will affect water quality or impact the functioning or environmental attributes of the SEA. The temporary camp and laydown area will not result in a widespread or irreversible impact on any environmental attributes of the SEA. ***Water Quality*** The terrain of the Project site is characterised by sparsely vegetated, gently undulating open plains, with the primary land use being pastoral and grazing. The waterways in the vicinity of the proposed tracks are ephemeral (as described in Section 3.8.1 of the Supporting Report). The topography in the area is generally flat, and flooding can significantly inundate the area during the wet season, which typically occurs from December to March. As noted in Section 3.8.6 of the Supporting Report, the water quality in the region typically experiences high sediment loads particularly during the high flooding flows of the wet season. Significant flooding typically blankets the area, as can be seen in **Plate 2**. As noted in the Supporting Report, the activities proposed as a part of this RIDA Application: • are very small scale and temporary; • will be constructed, utilised, and rehabilitated during the dry season; • will not involve the construction of waterway crossings; • will not be constructed within 100 m of mapped waterways or wetlands; • will avoid disturbance near surface water features; and • will avoid release of contaminants into the environment. Anglo is bound by the conditions in their EA which are designed to protect and safeguard the environment, including sensitive environmental areas and features, including the SEA. At all times, Anglo's activities will be conducted in compliance with all conditions of the Project's EA, and any additional conditions imposed by the RIDA. By remaining in compliance with the EA, the activities proposed as a part of this RIDA application will not significantly impact the water quality values in the region during flood events, and the activities proposed are not anticipated to impact surface water or groundwater quality.

Plate 2 View of Gregory River during the 2023 Flood Event

Source: https://www.abc.net.au/news/2023-03-15/gulf-of-carpentaria-flooding-photography-aerial-footage/102092778

2 ***Management of Sewerage***

Issue: *Limited information has been provided regarding management of sewerage waste at the temporary campsite.*

Actions: *Please provide details of proposed sewerage management measures in relation to the campsite, inclusive of any potential environmental risks associated.*

Response

The temporary accommodation camp will be run by a suitable third-party camp operator. A tender process will be undertaken by Anglo to engage the camp operator, and as a part of this tender process, the tenderers will be required to submit a waste management plan for Anglo's approval. The waste management plan will include the management of sewage wastes, and will need to meet (as a minimum) all waste management requirements of the local council and Anglo's internal waste management procedures, as well as the conditions of the EA and any additional conditions that may be imposed by the RIDA.

As stated in Section 2.2.2 of the Supporting Report, the camp will house approximately 10 staff, and will likely comprise caravan-style accommodation, with temporary ablution and wash facilities also provided. Sewage wastes will be collected and taken to the approved waste dump point in Gregory Downs (refer **Plate 3**). Portaloos will also be made available on site, and these will be serviced by arrangement with waste management company JJ Richards, who will also provide waste removal services.

The quantity of sewage waste generated by the small number of staff involved in this exploration program is not expected to cause any significant increase in sewage waste that cannot be accepted at or managed by existing disposal facilities. Any environmental risks associated with the generation, collection, transportation and offsite disposal of sewage wastes are considered low.

Plate 3 Waste Dump Point at Gregory

3	***Waste (including wastewater)*** ***Issue:*** *Insufficient information has been provided regarding waste, inclusive of wastewater, anticipated to be produced on site. Further, no management plan has been detailed for waste. The current Environmental Authority regarding waste is not deemed appropriate for managing the wastes within the SEA (and therefore, further conditioning might be required).* ***Actions:*** *Provide a detailed assessment of the type and amount of waste expected to be produced by the proposed exploration activities over the lifetime of the project. Also provide information regarding waste management plans and disposal practices, inclusive of potential associated environmental risk.*
	Response The temporary accommodation camp will be run by a suitable third-party camp operator. A tender process will be undertaken by Anglo to engage the camp operator, and as a part of this tender process, the tenderers will be required to submit a waste management plan for Anglo's approval. The waste management plan will need to meet (as a minimum) all waste management requirements of the local council and Anglo's internal waste management procedures, as well as the conditions of the EA and any additional conditions that may be imposed by the RIDA. All general refuse and recyclable wastes will be collected in designated closed waste receptacles, and will be transported as required to the Gregory Downs licenced refuse facility for disposal, with bottles recycled at container drop off locations, such as that provided at the nearby Gregory Downs Hotel. General maintenance of vehicles and equipment may take place on site if required. Maintenance activities will be undertaken in accordance with EA conditions. Any regulated wastes that may be generated by this general maintenance, such as waste oil and filters, will be separated by waste type

	and collected in designated regulated waste receptacles. The regulated wastes will be transported to Burketown Council's licenced waste facility for disposal. If detailed maintenance is required, the vehicles or equipment will be taken to a local licenced mechanics workshop for servicing. Waste management company JJ Richards will also provide waste removal services for the Project. The quantity of general and regulated wastes that may be generated by the exploration program is not expected to cause any significant issues for waste disposal that cannot be accepted at or managed by the existing waste disposal and management facilities. It is estimated that approximately 150 litres per person per day of greywater may be generated through showering, basin use, and washing facilities. In accordance with Condition B15 of the Environmental Authority, this greywater will be released to the environment, away from the camp and any waterways, and in accordance with any additional council requirements for the management of greywater. This water is expected to be of a quality akin to the greywater produced in typical domestic situations and released onto residential gardens and lawns. As the proposed activities are taking place during the dry season, it is expected that the greywater generated on site will either evaporate quickly or soak into the upper soil layers. This small amount of daily water release is not considered to carry any significant environmental risk, will not impact surface or groundwater quality, and will not significantly impact the functioning of the SEA. Sewage wastes are discussed in our response to Item 2.
4	***Hydrological processes*** ***Issue:*** *The expanded land disturbance area may impact the natural hydrological processes, including channel flow, overland flow, floodplain flow paths, groundwater interactions and beneficial flooding in the area.* ***Actions:*** *Provide information on the location of the proposed clearance lines[1] in relation to intersection with Groundwater Dependant Ecosystems and mapped watercourses.*
	Response There are no seismic activities proposed as a part of this RIDA application. None of the proposed activities intersect mapped watercourses, apart from a single crossing point that may be required to traverse Sandy Creek to access the western side of the proposed southern drilling area. As noted in the response to Item 1 and Section 3.9.4 of the Supporting Report, Sandy Creek is ephemeral, and activities in this area will take place during the dry season when the creek is dry and there are no flows. The track through Sandy Creek will not require the construction of any culverts, bridges or other structures in the creek bed. The exact location of this crossing point will be determined in the field at the time of the surveys. The crossing point will be located such that clearing of vegetation, including any riparian vegetation is avoided as far as practicable. The crossing point will only be utilised if the ground is considered sufficiently stable to allow the safe movement of the drilling equipment across the creek bed. This crossing point is not expected to impact the functioning of the creek system, nor the functioning of the biodiversity corridor. Further information of the waterway crossing points is provided in Section 3.8.1 of the Supporting Report.

[1] Following receipt of the Requirement Notice, DSDIP advised that, in citing "clearance lines", the Assessing Agency was querying impacts from clearing for seismic lines and associated tracks. As this application does not include seismic activities, DSDIP advised that this issue should be responded to in relation to clearing for access tracks.

The proposed activities are not located in areas identified as potential aquatic groundwater dependent ecosystems (GDEs) nor subterranean GDEs. Some parts of the areas identified for the proposed activities overlap areas shown on the Bureau of Meteorology (BoM) GDE atlas as being moderate potential terrestrial GDEs (refer **Figure 1**).

Terrestrial GDEs are defined as:

> *Terrestrial ecosystems which require access to groundwater on a permanent or intermittent basis to meet all or some of their water requirements so as to maintain their communities of plants and animals, ecological processes and ecosystem services. Terrestrial GDEs are terrestrial ecosystems dependent on the subsurface presence of groundwater accessed via their roots at depth. This may be indicated by prolonged vegetation vigour during times of lower surface water availability.*
> Source: https://wetlandinfo.des.qld.gov.au/wetlands/facts-maps/gde-background/gde-faq/#q=

The temporary access tracks will be constructed within the proposed drilling areas (as shown in **Figure 1**) to link existing tracks to the proposed drill pad. No tracks will be constructed within the biodiversity corridor of Sandy Creek. As the exact location for the construction of the drill pads within the proposed drilling areas is unknown at this stage (refer to Section 2.1 of the Supporting Report), it is not possible to provide an exact location or alignment for the proposed temporary access tracks. However, it is estimated that approximately 8 km of temporary access tracks, that are up to 3 m in width, may be required to be constructed. The tracks will be cleared and utilised during the dry season.

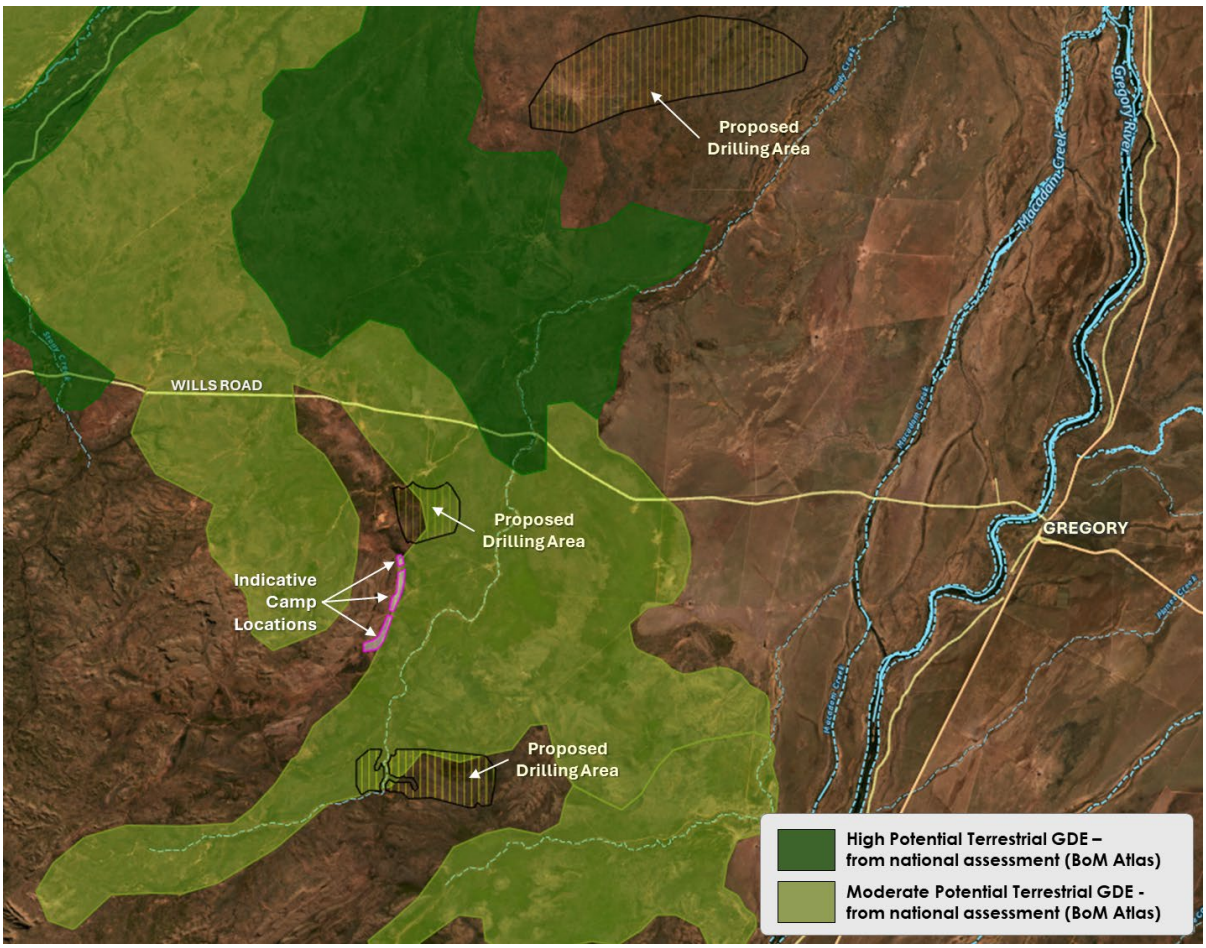

Figure 1 Potential Terrestrial GDEs in the Vicinity of the Proposed Activities

	Any clearing for the proposed activities, including the proposed access tracks, is limited to ground surface clearing, and this may involve the clearing of some vegetation. However, track alignments, which will be a maximum of 3 m in width, will be chosen to avoid any clearing of mature trees and shrubs wherever possible, in accordance with Condition B2 of the EA. Where clearing is necessary, tracks will be cleared by applying the "blade up" method to minimise disturbance to topsoil and the roots of trees and shrubs. It is highly unlikely that the creation of temporary access tracks will impact the functioning of any terrestrial GDEs that may be in the area. The access tracks will also not intersect groundwater, and will therefore have no groundwater interactions. The proposed access tracks are temporary, and following completion of the exploration program, all disturbed areas will be rehabilitated to leave the environment in the condition it was prior to the commencement of the program. Rehabilitation will be undertaken in accordance with the conditions in the Project's EA, any conditions imposed by the RIDA, and to the satisfaction of the landowner. As shown in the response to Item 1, flooding in the area is typically widespread and blankets the area. All activities will take place during the dry season, and tracks will be constructed at ground level. The activities will not impede floodplain flow paths or overland flow, nor will the tracks affect beneficial flooding. Further, no clearing is proposed within 100 m of mapped waterways or wetlands, and therefore the activities will not impact natural hydrological processes nor channel flow.
5	***Resource Activities within the Designated Precinct of the SEA*** ***Issue:*** *Sections 2.1 and 2.2 of the RIDA Application Supporting Report state that drill pads and access tracks (respectively) will be located to avoid activities within the SEA Designated Precinct. However, Section 3.1 of this report states that activities are proposed within the SEA and the Designated Precinct. The sections of the report are contradictory.* ***Actions:*** *Confirm whether or not resource activities will be undertaken within the SEA Designated Precinct. If resource activities are to be undertaken within the SEA Designated Precinct, please provide additional information on the nature of any proposed encroachment within the Designated Precinct, including the provision of detailed responses to the SEA environmental attributes at Part 3, s9 and the SEA criteria in Schedule 2, Part 5, s 14 and s15(1)(b)(i) - (iii) of the RPI Regulation.*
	Response This is a typographical error. Section 3.1 of the Supporting Report should read (amended text shown in underline): ***3.1 Strategic Environmental Area*** *The Project site covers an area of approximately 649,780 ha, and approximately 231,283 ha of the Gulf Rivers SEA overlaps the Project site (**Figure 2**). Of this, approximately 31,462 ha is SEA Designated Precinct. The activities proposed as a part of this RIDA Application are proposed to take place within the SEA, however no activities are proposed within the SEA Designated Precinct (**Figure 2**).*

We trust this information meets your requirements for the assessment of our application against the SEA criteria Schedule 2, Part 5 of the *Regional Planning Interests Regulation 2014*. Please do not hesitate to contact the undersigned should you require clarification or further information.

Yours sincerely

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