



12 December 2016

Chris Stanley
Environmental Protection Authority
Level 8 / 168 St Georges Terrace
PERTH WA 6000

Dear Chris

VENTUREX RESOURCES: SULPHUR SPRINGS ZINC-COPPER PROJECT - EPA REFERRAL

Please find enclosed the EPA referral form and supporting documentation for Venturex Resources Sulphur Springs Zinc-Copper Project (Sulphur Springs/the Project) located 144km south west of Port Headland in the Pilbara region of WA.

As you are aware, the Project has undergone several changes in ownership and development concepts since the initial feasibility study conducted by Outokumpu in 2002. Venturex purchased the Project in 2012 and in 2014 a mining proposal to construct an underground operation with a clearing footprint of 193ha was approved by the Department of Mines and Petroleum.

During 2015 and 2016 Venturex completed an optimisation study on Sulphur Springs that has substantially reduced its implementation and operational risks as well as improving its financial viability. It is proposed to develop the Project utilising an open pit mine to extract the upper portion of the deposit and an underground mine to extract the lower portion. The modified Project, that is the subject of this EPA referral, consists of the following key components:

- An open pit to mine the upper portion of the orebody.
- An underground mine (accessed via a portal within the pit) to mine the remainder of the orebody.
- A conventional processing plant which will produce separate copper and zinc concentrates.
- A conventional 'valley fill' Tailings Storage Facility (TSF) with a combined High Density Polyethylene (HDPE) and compacted low permeability sub-base liner.
- A heap leach facility within the same footprint as the ultimate TSF for recovery of copper from supergene and oxide ores.
- A Solvent Extraction & Electrowinning Plant (SX-EW) adjacent to the processing plant.
- A waste rock dump (WRD) and additional elements such as internal roads and material stockpiles.
- Supporting infrastructure including an accommodation village, waste water treatment plants, mine water treatment plant, surface water management structures and power station.
- Total disturbance footprint of 322ha

Registered & Principal Office

Level 2, 91 Havelock Street, West Perth WA 6005
PO Box 585, West Perth WA 6872

ABN 28 122 180 205

Tel: +61 8 6389 7400
Fax: +61 8 9463 7836

www.venturexresources.com
E: admin@venturexresources.com

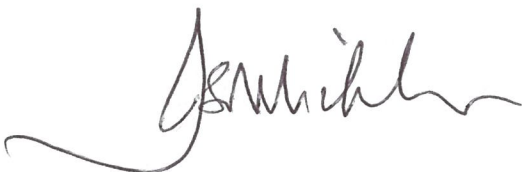
Substantial work on environmental baseline studies and the identification and assessment of environmental impacts and their mitigation has been undertaken on Sulphur Springs to support previous project approvals (CBH PER application in 2006 and Venturex Mining Proposal 2014) and more recently by Venturex for the current Project. The potential environmental impacts of the Project and measures to mitigate them are now well understood. Key changes include:

- Substantially smaller disturbance footprint than contemplated by the previous open pit proposal;
- Additional baseline flora and fauna studies at both a local and regional level conducted since preparation of the CBH PER and 2014 Mining Proposal;
- Investigations carried out on GDE's and subterranean fauna at a local and regional level as part of the 2014 Mining Proposal;
- A modest open pit footprint combined with water-shedding cover design for the integrated TSF and a store and release cover for the WRD;
- Adoption of an industry best practice design TSF (dual-lined - HDPE and compacted low permeability clay lined sub-base);
- Good understanding of potential for acid generation by waste rock achieved from the completion of waste characterisation studies commenced by CBH as part of the PER and the recent development of a detailed model of waste produced by the open pit;
- Careful siting of infrastructure to avoid or minimise clearing of conservation significant flora and fauna habitats; and
- An improved understanding across the industry of acid mine drainage management over the past ten years.

Venturex is seeking a decision from the EPA on the level of assessment required for the Project.

We trust the attached information meets the EPA's referral requirements, however should further information or clarification be required, please do not hesitate to contact Emma Bamforth (M: 0419 919 196) or myself (pH: 6389 7400).

Yours sincerely



JOHN NITSCHKE
Managing Director

Enc



Environmental Protection Authority

Referral of a Proposal to the Environmental Protection Authority under Section 38 of the *Environmental Protection Act 1986*.

EPA REFERRAL
FORM

PURPOSE OF THIS FORM

Section 38 of the *Environmental Protection Act 1986* (EP Act) makes provision for the referral to the Environmental Protection Authority (EPA) of a proposal (significant proposals, strategic proposals and proposals under an assessed scheme) by a proponent, a decision making authority (DMA), or any other person.

The purpose of this form is to ensure that EPA has sufficient information about a proposal to make a decision about the nature of the proposal and whether or not the proposal should be assessed under Part IV of the EP Act. Information provided in the referral form must be brief (no more than 30 pages), sharp and succinct to achieve the purposes of this form.

This form does not prevent the referrer from providing a supplementary referral report. Should a referrer choose to submit a supplementary referral report please ensure the following.

- i. Information is short, sharp and succinct.
- ii. Attachments are below eight megabytes (8 MB) as they will be published on the EPA's website (exemptions apply) for public comment. To minimise file size, "flatten" maps and optimise pdf files.
- iii. Cross-references are provided in the referral form to the appropriate section/s in the supplementary referral report.

This form is to be used for all proposals¹ which can be referred to the EPA under section 38 of the EP Act; i.e. referrals from: **proponents** of proposals (significant proposals, strategic proposals, derived proposals, proposals under an assessed scheme); **DMAs** (significant proposals); and **third parties** (significant proposals).

This form is divided into several sections, including; Referral requirements and Declaration; Part A - Information of the proposal and proponent; and Part B Environmental Factors. Guidance on successfully completing this form is provided throughout the form and is also available in the EPA's *Environmental Assessment Guideline for Referral of a Proposal under s38 of the EP Act (EAG 16)*.

Send completed forms to

Office of the Environmental Protection Authority
Locked Bag 10, East Perth WA 6892

or

Email: Registrar@epa.wa.gov.au

Enquiries

Office of the Environmental Protection Authority
Locked Bag 10, East Perth WA 6892

Telephone: 6145 0800

Fax: 6145 0895

Email: info@epa.wa.gov.au

Website: www.epa.wa.gov.au

¹ Please note that this form consolidates and replaces the following forms: *Referral of a Proposal by the Proponent to the EPA under section 38(1) of the EP Act*; *Referral of a Proposal by a third party to the EPA under section 38(1) of the EP Act*; and *Referral of a development proposal to the EPA by the decision making authority*.

Referral requirements and Declaration

The following section outlines the referral information required from a proponent, decision making authority and third party.

(a) Proponents

Proponents are expected to complete all sections of the form and provide GIS spatial data to enable the EPA to consider the referral. Spatial GIS data is necessary to inform the EPA's decision.

The EPA expects that a proponent will address Part B of the form as thoroughly as possible to demonstrate whether or not the EPA's objectives for environmental factors can be met.

If insufficient information is provided the EPA will request more information and processing of the referral will commence once the information is provided or the EPA decides to make a precautionary determination on the available information.

| Proponent to complete before submitting form | |
|--|---|
| Completed all the questions in Part A (essential) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Completed all the questions in Part B | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Completed all other applicable questions | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Included Attachment 1 – any additional document(s) the proponent wishes to provide | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Included Attachment 2 – confidential information (if applicable) | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Enclosed an electronic copy of all referral information, including spatial data and contextual mapping but clearly separating any confidential information | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Completed the Declaration | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| What is the type of proposal being referred? <i>* a referred proposal seeking to be declared a derived proposal</i> | <input checked="" type="checkbox"/> significant <input type="checkbox"/> strategic <input type="checkbox"/> derived* <input type="checkbox"/> under an assessed scheme |
| Do you consider the proposal requires formal environmental impact assessment? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| If yes, what level of assessment? <i>API = Assessment of Proponent Information</i> <i>PER = Public Environmental Review</i> | <input type="checkbox"/> API Category A <input type="checkbox"/> API Category B <input type="checkbox"/> PER |

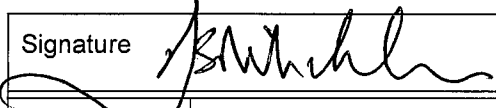
NB: The EPA may apply an Assessment on Proponent Information (API) level of assessment when the proponent has provided sufficient information about:

- the proposal;
- the proposed environmental impacts;
- the proposed management of the environmental impacts; and
- when the proposal is consistent with API criteria outlined in the Environmental Impact Assessment (Part IV Division 1 and 2) Administrative Procedures 2012.

If an API A formal level of assessment is considered appropriate, please refer to Environmental Assessment Guideline No. 14 *Preparation for an Assessment on Proponent Information (Category A) Environmental Review Document EAG 14 (EAG14)*.

Declaration

I, John Nitschke, (*full name*) declare that I am authorised on behalf of Venturex Resources Limited (being the person responsible for the proposal) to submit this form and further declare that the information contained in this form is true and not misleading.

| | | | | | | | |
|-----------|---|--------------------|----------------------------|--------------|---------------|------|--|
| Signature |  | | | Name (print) | John Nitschke | | |
| Position | Managing Director | Organisation | Venturex Resources Limited | | | | |
| Email | john.nitschke@venturexresources.com | | | | | | |
| Address | Level 2 | 91 Havelock Street | | | | | |
| | West Perth | | | | WA | 6005 | |
| Date | 10 th December 2016 | | | | | | |

(b) Decision-making authority

The EPA expects decision-making authorities to complete applicable sections of Part A of the form and provide the proponent an opportunity to provide additional information in Part B of the form where appropriate.

Wherever possible the DMA should obtain relevant spatial information from the proponent and provide this to the EPA with the referral.

| DMA to complete before submitting form | |
|--|---|
| Completed all the questions in Part A (essential) | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Provided Part B to the proponent for completion | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Completed all other applicable questions | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Included Attachment 1 – any supporting information | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Enclosed an electronic copy of all referral information, including spatial data and contextual mapping | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Completed the below Declaration | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Do you consider the proposal requires formal environmental impact assessment? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| What is the type of proposal being referred? | <input type="checkbox"/> significant proposal <input type="checkbox"/> significant proposal under an assessed scheme |

Declaration

I,, (*full name*) submit this referral to the EPA for consideration of the environmental significance of its impacts.

| | | | |
|-----------|------------|--------------|----------|
| Signature | | Name (print) | |
| Position | | Organisation | |
| Email | | | |
| Address | Street No. | Street Name | |
| | Suburb | State | Postcode |
| Date | | | |

(c) Third Party

Third parties are asked to have consideration for the Significance Test outlined in Part A Section 1.5 of this form before referring a significant proposal to the EPA. The EPA will only consider proposals that are likely, if implemented, to have a significant effect on the environment.

Third parties are to provide sufficient information to clearly identify the significant proposal, the proponent, and their reasons for referring the proposal. This can be done by completing as much of Part A of the form as possible, taking into consideration the information available. Third parties may wish to fill in Part B of the form to advance their own views of the significance of the environmental impacts and the need for EPA assessment.

In most cases the EPA will seek additional information from the proponent. This will be to confirm or amend the identity of the proponent, the proposal, and to allow the proponent opportunity to provide its views on the significance of the environmental impacts and the need for EPA assessment.

| Third Party to complete before submitting form | |
|---|--|
| Complete all applicable questions in Part A and B | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Completed the Declaration | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Do you consider the proposal requires formal environmental impact assessment? | <input type="checkbox"/> Yes <input type="checkbox"/> No |

Declaration

I,, (*full name*) submit this referral to the EPA for consideration of the environmental significance of its impacts.

| | | | |
|-----------|------------|--------------|----------|
| Signature | | Name (print) | |
| Email | | | |
| Position | | Organisation | |
| Address | Street No. | Street Name | |
| | Suburb | State | Postcode |
| Date | | | |

PART A: Information on the proposal and the proponent

All fields of Part A must be completed by the proponent and/or decision-making authority for this document to be processed as a referral. Third party referrers are only expected to fill in the fields they have information for.

1 PROPONENT AND PROPOSAL DESCRIPTION

1.1 The proponent of the proposal

| Proponent and/or DMA to complete | |
|--|---|
| Name of the proponent | Venturex Resources Limited |
| Joint Venture parties (if applicable) | N/A |
| Australian Company Number(s) | ABN 11 113 177 432 |
| Postal Address <i>(Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State)</i> | PO Box 585 West Perth WA 6005 |
| Key proponent contact for the proposal <i>Please include: name; physical address; phone; and email.</i> | Name: John Nitschke Company: Venturex Resources Limited Title: Managing Director Address: Level 2, 91 Havelock Street, West Perth WA 6005 Phone: (08) 6389 7400 Fax: (08) 9481 6405 Email: john.nitschke@venturexresources.com |
| Consultant for the proposal (if applicable) <i>Please include: name; physical address; phone; and email.</i> | Name: Karen Ganza / Freea Itzstein-Davey Company: MBS Environmental Address: 4 Cook Street, West Perth WA 6005 Phone: (08) 9226 3166 Fax: (08) 9226 3177 Email: kganza@mbsenvironmental.com.au & Freea@mbsenvironmental.com.au |

1.2 Proposal

Proposal is defined under the EP Act to mean a "project, plan, programme policy, operation, undertaking or development or change of land use, or amendment of any of the foregoing, but does not include scheme". Before completing this section please refer to Environmental Protection Bulletin 17 – Strategic and derived proposals (EPB 17) and Environmental Assessment Guideline for Defining the Key Characteristics of a proposal (EAG 1).

| Proponent and/or DMA to complete | |
|--|---|
| Title of the proposal | Sulphur Springs Zinc-Copper Project (Sulphur Springs Project) |
| What project phase is the proposal at? | <input type="checkbox"/> Scoping <input checked="" type="checkbox"/> Feasibility <input type="checkbox"/> Detailed design <input type="checkbox"/> Other _____ |
| Proposal type <i>More than one proposal type can be identified, however for filtering purposes it is recommended that only the primary proposal type is identified.</i> | <input type="checkbox"/> Power/Energy Generation <input type="checkbox"/> Hydrocarbon Based – coal <input type="checkbox"/> Hydrocarbon Based – gas <input type="checkbox"/> Waste to energy <input type="checkbox"/> Renewable – wind <input type="checkbox"/> Renewable – wave <input type="checkbox"/> Renewable – solar <input type="checkbox"/> Renewable – geothermal <input type="checkbox"/> Mineral / Resource Extraction <input type="checkbox"/> Exploration – seismic <input type="checkbox"/> Exploration – geotechnical <input checked="" type="checkbox"/> Development <input type="checkbox"/> Oil and Gas Development <input type="checkbox"/> Exploration <input type="checkbox"/> Onshore – seismic <input type="checkbox"/> Onshore – geotechnical <input type="checkbox"/> Onshore – development <input type="checkbox"/> Offshore – seismic <input type="checkbox"/> Offshore – geotechnical <input type="checkbox"/> Offshore – development <input type="checkbox"/> Industrial Development <input type="checkbox"/> Processing <input type="checkbox"/> Manufacturing <input type="checkbox"/> Beneficiation <input type="checkbox"/> Land Use and Development <input type="checkbox"/> Residential – subdivision <input type="checkbox"/> Residential – development <input type="checkbox"/> Commercial – subdivision <input type="checkbox"/> Commercial – development <input type="checkbox"/> Industrial – subdivision <input type="checkbox"/> Industrial – development <input type="checkbox"/> Agricultural – subdivision <input type="checkbox"/> Agricultural – development <input type="checkbox"/> Tourism <input type="checkbox"/> Linear Infrastructure <input type="checkbox"/> Rail <input type="checkbox"/> Road <input type="checkbox"/> Power Transmission <input type="checkbox"/> Water Distribution <input type="checkbox"/> Gas Distribution |

| Proponent and/or DMA to complete | |
|--|--|
| | <input type="checkbox"/> Pipelines <input type="checkbox"/> Water Resource Development <input type="checkbox"/> Desalination <input type="checkbox"/> Surface or Groundwater <input type="checkbox"/> Drainage <input type="checkbox"/> Pipelines <input type="checkbox"/> Managed Aquifer Recharge <input type="checkbox"/> Marine Developments <input type="checkbox"/> Port <input type="checkbox"/> Jetties <input type="checkbox"/> Marina <input type="checkbox"/> Canal <input type="checkbox"/> Aquaculture <input type="checkbox"/> Dredging <i>If other, please state below:</i> <input type="checkbox"/> Other _____ |
| Proponent and/or DMA to complete | |
| <p>Description of the proposal – describe the key characteristics of the proposal in accordance with <u>EAG 1</u>.</p> | <p>Proposal Title: Sulphur Springs Zinc-Copper Project</p> <p>Proponent: Venturex Resources Limited</p> <p>Description: The project is located approximately 144 km southeast of Port Hedland and 57 km west of Marble Bar (by road) in the Pilbara Region of Western Australia. Venturex Resources Limited proposes to develop a small open pit and underground mine, construct associated mine infrastructure (including a waste rock dump, heap leach facility, conventional flotation and concentrator processing plant, concentrate storage building, solvent extraction and electrowinning facility (SX-EW), offices, workshop, accommodation village and roads) and discharge tailings to a dual lined (HDPE and compacted clay) tailings storage facility (TSF).</p> <p>Physical Elements:</p> <ul style="list-style-type: none"> • Clearing of no more than 263 ha within an 848.3 ha Development Envelope for an open pit, waste rock dump, processing plant, solvent extraction & electrowinning facility, ponds, explosives storage, accommodation village, and associated mine elements. • Clearing of no more than 58.9 ha within an 848.3 ha Development Envelope for TSF and heap leach facility. <p>Operational Elements:</p> <ul style="list-style-type: none"> • Disposal of no more than 17.5 million loose cubic metres of mining waste rock in a permanent surface waste rock dump. • Deposition of no more than 1.07 Mt of supergene and oxide ore in a lined (primary |

| Proponent and/or DMA to complete | | | | | | | | | |
|--|--|--------------|-----------|----------|---|----------|---|----------|--|
| | <p>HDPE liner, compacted sub-base and secondary HDPE liner) heap leach facility.</p> <ul style="list-style-type: none"> • Disposal of no more than 1.5 Mtpa of process tailings in a 'valley fill' dual lined (HDPE and compacted clay) tailings storage facility. | | | | | | | | |
| Timeframe in which the proposal is to occur (including start and finish dates where applicable). | <p>Current planning is working towards the following timelines.</p> <ul style="list-style-type: none"> • Aim to complete feasibility study and permitting by Q1 2017. • Aim to commence construction by Q4 2017 • Aim to commence operations by Q2 2018 <p>Life of Mine is currently estimated to be 11 years.</p> | | | | | | | | |
| Details of any staging of the proposal. | <p>This is not a staged proposal. The current mining schedule has approximately 1.07 Mt of supergene and oxide ore being mined from the surface from the commencement of mining at Sulphur Springs. The opportunity exists to mine this portion of the ore body separate to the sulphide ore, and process the material via heap leach and SX-EW plant prior to commencing underground mining activities.</p> | | | | | | | | |
| What is the current land use on the property, and the extent (area in hectares) of the property? | <p>The majority of the Sulphur Springs Zinc-Copper Project is located on Unallocated Crown Land and the current land use is exploration. The northern section of the site access road and accommodation village lie within the Panorama and Strelley Pastoral leases.</p> <p>Proposed elements will sit wholly within mining leases and miscellaneous licences owned by Venturex Resources Limited, which encompass an area of approximately 7,061 ha.</p> | | | | | | | | |
| <p>Have pre-referral discussions taken place with the OEPA?</p> <p>If yes, please provide the case number. If a case number was not provided, please state the date of the meeting and names of attendees.</p> | <p>Yes. Meetings held to discuss the project with OEPA are summarised in the table below.</p> <table border="1"> <thead> <tr> <th>Meeting Date</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>10/03/16</td> <td>Chris Stanley, Marie Heath, John Nitscke, James Guy, Kristy Sell, Karen Ganza</td> </tr> <tr> <td>10/05/16</td> <td>Chris Stanley, Anthony Sutton, John Nitscke, Kristy Sell, Karen Ganza</td> </tr> <tr> <td>16/11/16</td> <td>Chris Stanley, John Nitscke, Emma Bamforth, Freea Itzstein-Davey</td> </tr> </tbody> </table> | Meeting Date | Attendees | 10/03/16 | Chris Stanley, Marie Heath, John Nitscke, James Guy, Kristy Sell, Karen Ganza | 10/05/16 | Chris Stanley, Anthony Sutton, John Nitscke, Kristy Sell, Karen Ganza | 16/11/16 | Chris Stanley, John Nitscke, Emma Bamforth, Freea Itzstein-Davey |
| Meeting Date | Attendees | | | | | | | | |
| 10/03/16 | Chris Stanley, Marie Heath, John Nitscke, James Guy, Kristy Sell, Karen Ganza | | | | | | | | |
| 10/05/16 | Chris Stanley, Anthony Sutton, John Nitscke, Kristy Sell, Karen Ganza | | | | | | | | |
| 16/11/16 | Chris Stanley, John Nitscke, Emma Bamforth, Freea Itzstein-Davey | | | | | | | | |

| Proponent and/or DMA to complete | |
|--|-----|
| DMA (Responsible Authority) to complete | |
| <p>For a proposal under an assessed scheme (as defined in <u>section 3 of the EP Act</u>, applicable only to the proponent and DMA) provide details (in an attachment) as to whether:</p> <ul style="list-style-type: none"> • <i>The environmental issues raised by the proposal were assessed in any assessment of the assessed scheme.</i> • <i>The proposal complies with the assessed scheme and any environmental conditions in the assessed scheme.</i> | N/A |

1.3 Strategic / derived proposals

Complete this section if the proposal being referred is a strategic proposal or you are seeking the proposal to be declared a derived proposal. Note: Only a proponent may refer a strategic proposal and seek a proposal to be declared a derived proposal.

| Proponent to complete | |
|---|---|
| Is this referred proposal a strategic proposal? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are you seeking that this proposal be declared a derived proposal? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| If you are seeking that this proposal be declared a derived proposal, what is the Ministerial Statement number (MS #) of the associated strategic proposal? | MS #: _____ |

1.4 Location

Proponents and DMAs must provide spatial data. Please refer to EAG 1 for more detail. The latest spatial data **must** be provided with the referral, displaying the current condition of the proposal area.

| Proponent, DMA and Third Party to complete | |
|--|--|
| Name of the Local Government Authority in which the proposal is located. | Shire of East Pilbara |
| Location: a) street address; lot number; suburb; and nearest road intersection; or b) if remote the nearest town; and distance and direction from that town to the proposal site. | The Sulphur Springs project is located approximately 57 km to the West of Marble Bar and 144km south-east of Port Headland in the Pilbara Region of WA. |
| Have maps and figures been included with the referral (consistent with <u>EAG 1</u> where appropriate)? <i>The types of maps and figures which need to be provided (depending on the nature of the proposal) include:</i> <ul style="list-style-type: none"> maps showing the regional location and context of the proposal; and figures illustrating the proposal elements. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (See Figures 1, 2, 3 and 4 of the Supporting Document for project location, land tenure and proposed elements). |
| Proponent and DMA to complete | |
| Have electronic copies of spatial data been included with the referral? NB: <i>Electronic spatial (GIS or CAD) data, geo-referenced and conforming to the following parameters:</i> <ul style="list-style-type: none"> GIS: polygons representing all activities and named; CAD: simple closed polygons representing all activities and named; datum: GDA94; projection: Geographic (latitude/longitude) or Map Grid of Australia (MGA); format: ESRI geodatabase or shapefile, MapInfo Interchange Format, Microstation or AutoCAD.. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

1.5 Significance test and environmental factors

| Proponent, DMA and Third Party to complete | |
|--|---|
| What are the likely significant environmental factors for this proposal? | <input type="checkbox"/> Benthic Communities and Habitat <input type="checkbox"/> Coastal Processes <input type="checkbox"/> Marine Environmental Quality <input type="checkbox"/> Marine Fauna <input checked="" type="checkbox"/> Flora and Vegetation <input type="checkbox"/> Landforms <input type="checkbox"/> Subterranean Fauna <input type="checkbox"/> Terrestrial Environmental Quality <input checked="" type="checkbox"/> Terrestrial Fauna <input type="checkbox"/> Hydrological Processes <input type="checkbox"/> Inland Waters Environmental Quality |

| Proponent, DMA and Third Party to complete | |
|---|--|
| | <input type="checkbox"/> Air Quality & Atmospheric Gases <input type="checkbox"/> Amenity <input type="checkbox"/> Heritage <input type="checkbox"/> Human Health <input type="checkbox"/> Offsets <input checked="" type="checkbox"/> Rehabilitation and Decommissioning (See section 4 of the Supporting Document for further information). |
| Having regard to the Significance Test (refer to Section 7 of the <i>EIA Administrative Procedures 2012</i>) in what ways do you consider the proposal may have a significant effect on the environment and warrant referral to the EPA? | <p><i>Please outline in two paragraphs or less.</i></p> <p>Development of the project will include clearing of approximately 27 ha of habitat that may be suitable for the Northern Quoll (<i>Dasyurus hallucatus</i>), clearing in the vicinity (but outside the 50 m environmentally sensitive area) for known <i>Pityrodia sp. Marble Bar</i> individuals and development of an open pit, waste rock dump and integrated heap leach and TSF in a remote greenfields mining area.</p> <p>Venturex believes that through the implementation of management plans and education of the workforce it can meet the EPA objectives for flora and vegetation and terrestrial fauna. Furthermore, rehabilitation and decommissioning of the project will, as a minimum, use accepted industry practices and be managed in accordance with the Mine Closure Plan Guidelines jointly published by the EPA and DMP. Venturex will also trial technologies as they emerge that might help to mitigate any potential long term environmental impacts of the project.</p> <p>(See section 4.0 of the Supporting Document for identification of environmental factors and assessment of potential impacts information).</p> |

1.6 Confidential information

All information will be made publically available unless authorised for exemption under the EP Act or subject to the Freedom of Information Act 1992.

| Proponent to complete | |
|--|---|
| Does the proponent request that the EPA treat any part of the referral information as confidential? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <p><i>Ensure all confidential information is provided in a separate attachment in hard copy.</i></p> | |

2 REGULATORY CONSIDERATIONS

This section applies to the Local, State and Commonwealth regulatory considerations for the referred proposal.

2.1 Government approvals

2.1.1 State or Local Government approvals

| DMA to complete | |
|---|---|
| What approval(s) is (are) required from you as a decision-making authority? | |
| Is rezoning of any land required before the proposal can be implemented? If yes, please provide details. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

2.1.2 Regulation of aspects of the proposal

Complete the following to the extent possible.

| Proponent to complete | |
|--|---|
| Do you have legal access required for the implementation of all aspects of the proposal? <i>If yes, provide details of legal access authorisations / agreements / tenure.</i> <i>If no, what authorisations / agreements / tenure is required and from whom?</i> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The Sulphur Springs Project is located on granted mining leases M45/494, M45/653 and M45/1001 and granted miscellaneous licences L45/166, L45/170, L45/173, and L45/189. |

Outline both the existing approvals and approvals that will be / are being sought as a part of this proposal.

| Proponent to complete | | | |
|--|---|--------------------------------------|--|
| Aspects* of the proposal | Type of approval | Legislation regulating this activity | Which State agency /entity regulate this activity? |
| Abstraction / Dewatering | Existing Approvals: <ul style="list-style-type: none"> Groundwater Licence GWL 165207(4). Groundwater Licence GWL 176408(3). Approvals Sought: <ul style="list-style-type: none"> Amendment to GWL 165207 (4) to increase abstraction volume from 0.15ML/yr to 0.75ML/yr. Amendment to GWL 176408(3) to transfer part of existing allocation from Atlas Iron Limited to Venturex Resources Limited. | <i>R/VI Act 1914</i> | Department of Water |
| Ore processing, sewage treatment, landfill and power generation. | Approvals Sought: <ul style="list-style-type: none"> Works Approval and Environmental Licence | <i>EP Act 1986 – Part V</i> | Department of Environment Regulation |

| | | | |
|---|--|----------------------|-----------------------------------|
| Land Clearing | <p>Existing Approvals:</p> <ul style="list-style-type: none"> Native Vegetation Clearing Permit CPS 5658/1 issued to Venturix Resources Limited in 2014 permits clearing of up to 193 ha for the project. <p>Approvals Sought:</p> <ul style="list-style-type: none"> An amendment to CPS 5658/1 to permit clearing an additional 128.9 ha. | EP Act 1986 – Part V | Department of Mines and Petroleum |
| Mining, ore processing, supporting infrastructure | <p>Existing Approvals:</p> <ul style="list-style-type: none"> Mining Proposal REG ID 40542 granted for aspects of the project in 2014. Site wide Mine Closure plan for aspects of the project approved in 2014. <p>Approvals Sought:</p> <ul style="list-style-type: none"> Mining Proposal for current (amended) project elements. Mine Closure Plan to address current (amended) project elements. | Mining Act 1978 | Department of Mines and Petroleum |

*e.g. mining, processing, dredging

2.1.3 Commonwealth Government Environment Protection and Biodiversity Conservation Act 1999 approvals

Refer to the assessment bilateral agreement between the Commonwealth of Australia and the State of Western Australia for assistance on this section.

| Proponent to complete | |
|---|--|
| 1. Does the proposal involve an action that may be or is a controlled action under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>If no continue to Part A section 2.1.4.</i> |
| 2. What is the status of the decision on whether or not the action is a controlled action? | <input checked="" type="checkbox"/> Proposal not yet referred <input type="checkbox"/> Proposal referred, awaiting decision <input type="checkbox"/> Assessed – controlled action <input type="checkbox"/> Assessed – not a controlled action |
| 3. If the action has been referred, when was it referred and what is the reference number (Ref #)? | Date: _____ Ref #: _____ |
| 4. If the action has been assessed, provide the decision in an attachment. Has an attachment been provided? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. Do you request this proposal to be assessed under the bilateral agreement? | <input type="checkbox"/> Yes <input type="checkbox"/> No |

Complete the following to the extent possible for the Public Comment of EPBC Act referral documentation.

| Proponent to complete | |
|--|---|
| 6. Have you invited the public to comment on your referral documentation? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 7. How was the invitation published? | <input type="checkbox"/> newspaper <input type="checkbox"/> website |
| 8. Did the invitation include all of the following? | |
| (a) brief description of the action | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| (b) the name of the action | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| (c) the name of the proponent | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| (d) the location of the action | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| (e) the matters of national environmental significance that will be or are likely to be significantly impacted | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| (f) how the relevant documents may be obtained | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| (g) the deadline for public comments | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| (h) available for public comment for 14 calendar days | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| (i) the likely impacts on matters of national environmental significance | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| (j) any feasible alternatives to the proposed action | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| (k) possible mitigation measures | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 9. Were any submissions received during the public comment period? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 10. Have public submissions been addressed? If yes provide attachment. | <input type="checkbox"/> Yes <input type="checkbox"/> No |

2.1.4 Other Commonwealth Government Approvals

| Proponent, DMA and Third Party to complete | | | |
|---|-------------------|---|--|
| Is approval required from other Commonwealth Government/s for any part of the proposal? | | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| <i>If yes, please complete the table below.</i> | | | |
| Agency / Authority | Approval required | Application lodged? | Agency / Local Authority contact(s) for proposal |
| | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |

3. SUPPORTING INFORMATION

Please attach copies of any relevant information on the proposal, supporting evidence and / or existing environmental surveys, studies or monitoring information undertaken and list the documents below.

| Proponent, DMA and Third Party to complete | | | |
|---|---|-------------------|--|
| (1) | Sulphur Springs Project EPA Referral Supporting Document December 2016 | MBS Environmental | The Supporting Document provides detailed information regarding the proposed Sulphur Springs Zinc-Copper Project and associated environmental impact assessment. |
| (2) | | | |
| (3) | | | |

PART B: ENVIRONMENTAL FACTORS

The purpose of Part B is to assist the EPA to determine the significance of the likely environmental impacts of the proposal in accordance with the EPA's *Environmental Assessment Guideline for Environmental factors and objectives* (EAG 8) and *Environmental Assessment Guideline for Application of a significant framework in the EIA process* (EAG 9). Referrers completing Part B should refer closely to EAG 8 and EAG 9.

The EPA has prepared *Referral of a Proposal under s38 of the EP Act EAG No.16 - Appendix A* (Appendix A) to assist in identifying factors and completing the below table. Further guidance can be found in the guidance and policy documents cited in Appendix A under each factor.

How to complete Part B

For each environmental factor, that is likely to be significantly impacted by the implementation of the proposal, make a copy of the table below and insert a summary of the relevant information relating to the proposal. The table can be broken down into more than one table per factor, if the need arises. For example the hydrological processes factor can be presented in two separate tables, one for surface water and one for groundwater, or similarly one for construction and one for operations.

For complex proposals a supplementary referral report can be provided in addition to the referral form. If this option is chosen the table must still be completed (summaries are acceptable) to assist the Office of the EPA with statistical reporting and filtering proposals for processing.

Proponents expecting an API level of assessment must provide information in accordance with the EPA's *Environmental Assessment Guideline for Preparation of an API-A environmental review document* (EAG 14).

For each of the significant environmental factors, complete the following table (Questions 1 – 10).

| Proponent to complete. DMA and Third Party to complete to the best of their knowledge. | | |
|---|---|--|
| 1 | Factor, as defined in <u>EAG 8</u> | <ul style="list-style-type: none"> • Flora and vegetation. • Terrestrial fauna. • Rehabilitation and decommissioning. |
| 2 | EPA Objective, as defined in <u>EAG 8</u> | See section 4.0 of the Supporting Document for identification of environmental factors and assessment of potential impacts information. |
| 3 | Guidance - what established policies, guidelines, and standards apply to this factor in relation to the proposal? | See section 4.0 of the Supporting Document for identification of environmental factors and assessment of potential impacts information. |

| Proponent to complete. DMA and Third Party to complete to the best of their knowledge. | | |
|---|--|---|
| 4 | <p>Consultation - outline the need for consultation and the outcomes of any consultation in relation to the potential environmental impacts, including:</p> <ul style="list-style-type: none"> • <i>anticipated level of public interest in the impact;</i> • <i>consultation with regulatory agencies; and</i> • <i>consultation with community.</i> | See Section 5.0 of the Supporting Document for stakeholder consultation information. |
| 5 | <p>Baseline information - describe the relevant characteristics of the receiving environment.</p> <p><i>This may include: regional context; known environmental values, current quality, sensitivity to impact, and current level of cumulative impacts.</i></p> | See Section 3.0 of the Supporting Document for existing environment information. |
| 6 | <p>Impact assessment - describe the potential impact/s that may occur to the environmental factor as a result of implementing the proposal.</p> | See section 4.0 of the Supporting Document for identification of environmental factors and assessment of potential impacts information. |
| 7 | <p>Mitigation measures - what measures are proposed to mitigate the potential environmental impacts? The following should be addressed:</p> <ul style="list-style-type: none"> • <i>Avoidance - avoiding the adverse environmental impact altogether;</i> • <i>Minimisation - limiting the degree or magnitude of the adverse impact;</i> • <i>Rehabilitate – restoring the maximum environmental value that is reasonably practicable; and</i> • <i>Offsets – actions that provide environmental benefits to counterbalance significant residual environmental impacts or risks of a project or activity.</i> | See section 4.0 of the Supporting Document for identification of environmental factors and assessment of potential impacts information. |

| Proponent to complete. DMA and Third Party to complete to the best of their knowledge. | | |
|---|--|--|
| 8 | <p>Residual impacts – review the residual impacts against the EPA objectives.</p> <p><i>It is understood that the extent of any significant residual impacts may be hard to quantify at the referral stage. Referrers are asked to provide, as far as practicable, a discussion on the likely residual impacts and form a conclusion on whether the EPA's objective for this factor would be met if residual impacts remain. This will require:</i></p> <ul style="list-style-type: none"> • <i>quantifying the predicted impacts (extent, duration, etc.) acknowledging any uncertainty in predictions;</i> • <i>putting the impacts into a regional or local context, incorporating knowable cumulative impacts; and</i> • <i>comparison against any established environmental policies, guidelines, and standards.</i> | <p>See section 4.0 of the Supporting Document for identification of environmental factors and assessment of potential impacts information.</p> |
| 9 | <p>EPA's Objective – from your perspective and based on your review, which option applies to the proposal in relation to this factor? Refer to <u>EAG 9</u></p> | <p><input checked="" type="checkbox"/> <i>meets the EPA's objective</i></p> <p><input type="checkbox"/> <i>may meet the EPA's objective</i></p> <p><input type="checkbox"/> <i>is unlikely to meet the EPA's objective</i></p> |
| 10 | <p>Describe any assumptions critical to your conclusion (in Question 9). e.g. <i>particular mitigation measures or regulatory conditions.</i></p> | <p>See section 4.0 of the Supporting Document for identification of environmental factors and assessment of potential impacts information.</p> |

In circumstances where there was some uncertainty on the level of significance of a particular factor it is recommended that a brief summary (no longer than 1 - 2 paragraphs) is provided on the steps taken to determine why a factor was not considered to be significant.