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24 February 2025

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Dear Phil

**RE: RPI25/001: Anglo American – Planet Downs Project (Access Tracks)
Response to Requirement Notice of 17 February 2025**

This document provides information to support the Application for a Regional Interests Development Approval (RIDA) (application reference RPI25/001) (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 D25/22084, dated 17 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 RPI25/001 (the RIDA Application Form) and the RPI25-001 Anglo American – Planet Downs Project RIDA Application: Supporting Information Report (the Supporting Report). The activities proposed in the RIDA Application will support the exploration activities approved in 2024 under RIDA RPI24/001.

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:

There has been insufficient information provided regarding the potential erosion and sedimentation associated with the proposed access tracks, particularly during the wet season and flooding might affect the proposed infrastructure's impact on the strategic environmental area (SEA) and designated precinct.

Actions:

- a. *Provide further information on the potential impacts of the proposed access tracks during the wet season, detailing mitigation strategies and control measures to safeguard sensitive areas, including the designated precinct and [Strategic Environmental Area]¹ (SEA).*
- b. *Provide further information to evaluate potential flood risks resulting from the works and any measures required to ensure water quality remains unaffected.*

Response:

There are a large array of existing permanent sealed roads, permanent unsealed roads, and permanent unsealed access tracks that traverse both the Gulf Rivers SEA and Designated Precinct, particularly in the vicinity of the 20 km of temporary access tracks that are proposed to be constructed as a part of this RIDA Application (refer to Plate 3.1 of the Supporting Report).

Plate 1 provides an aerial view of the alignment of one of the proposed tracks and illustrates the large number of existing roads and access tracks in the area.

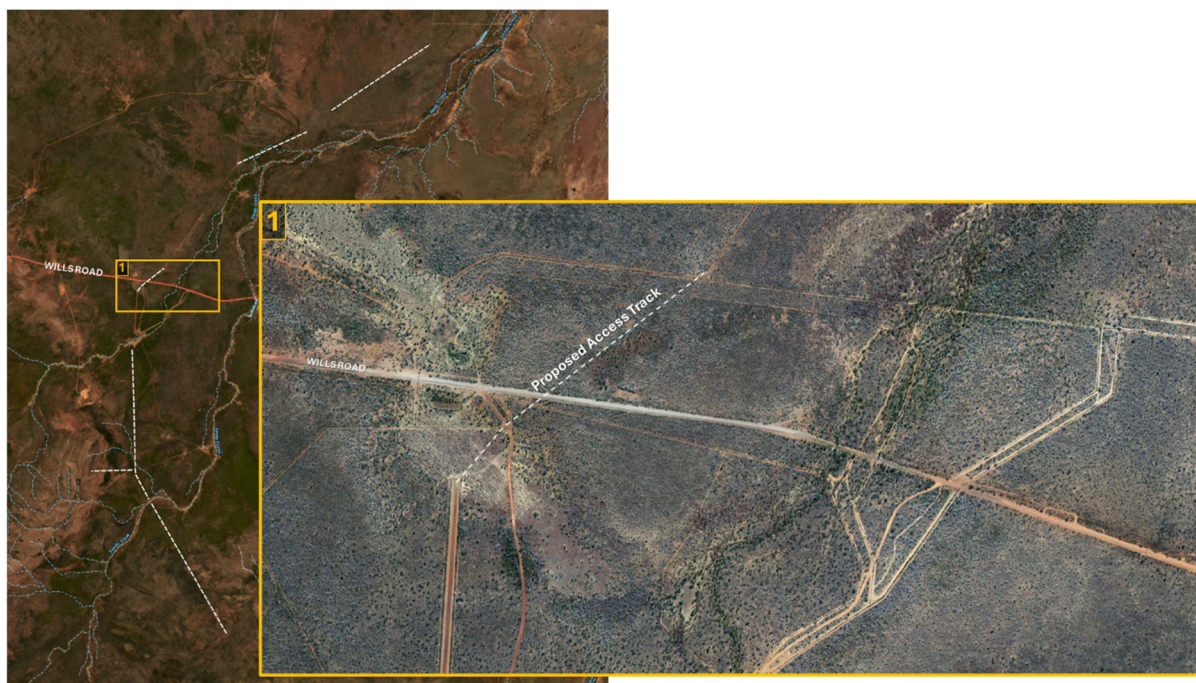


Plate 1 Aerial view of a Proposed Access Track Locations and the Existing Tracks in the Area

Note: Proposed access tracks shown as white dashed lines

¹ Correspondence from DSDIP on 17 February 2025 confirmed a typographical error in the issued Requirement Notice: "Special Ecological Areas" is a typo. It should say "Strategic Environmental Areas".

The proposed temporary tracks are located on two large cattle stations, Yeldham Station and Gregory Downs Station, that both support a large head of cattle. The proposed tracks will be aligned to connect with the existing permanent tracks in the area (refer **Plate 1**).

Erosion and Sedimentation

The Project's EA includes the following conditions relevant to erosion and sediment control and the construction of new tracks, which Anglo must adhere to:

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.

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.

The proposed access tracks are temporary in nature, and likely to be traversed infrequently over the course of a few days whilst the exploration activities (as described in RPI24/001) take place in that area. The tracks will be created to follow the natural grade of the topography and will be constructed along ground level. **Plate 2** provides an example of an access track that is typical for a Project of this nature.

Track construction will be undertaken using equipment such as a front end loader, backhoe 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 will traverse two unnamed tributaries of Sandy Creek at approximately three locations, it should be noted that these tributaries are ephemeral minor drainage lines of stream order 2. 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.



Plate 2 Example of an Access Track that is Typical of a Project of this Nature

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 (likely to be 4WDs, UTVs and survey vehicle) through the area and to facilitate the survey program described in RPI24/001. 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 20 km 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. No topsoil will need to be cleared or stockpiled.

The activities that will be taking place as a part of the exploration program (as described in RPI24/001) 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 unlikely 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 relevant surveys, and prior to the commencement of the wet season.

Further, the temporary tracks will be constructed, utilised, and rehabilitated during the dry season, and erosion and sediment controls are therefore unlikely 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.

All conditions of the Project's EA, including those noted earlier, are designed to protect and safeguard sensitive environmental areas. 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.

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 3**.

The proposed tracks are temporary, and will be constructed, utilised, and rehabilitated during the dry season. The proposed tracks are similar to the large number of existing, permanent unsealed tracks in the area, and there are no mechanisms whereby the construction and use of the temporary tracks will significantly impact the water quality values in the region during flood events, beyond what is already experienced from the existing permanent tracks.

As noted in Section 3.8.6 of the Supporting Report, the activities proposed as a part of this RIDA Application will be undertaken in the dry season, will not involve the construction of waterway crossings, will avoid disturbance near surface water features, and will not release contaminants into the environment. The activities proposed are unlikely to impact surface water or groundwater quality.



Plate 3 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>

Conclusion

At the completion of the surveys, 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 access tracks will not create an erosion or sedimentation risk that will affect water quality, nor will the tracks impact the functioning or environmental attributes of the SEA or Designated Precinct. The access tracks will not result in a widespread or irreversible impact on any environmental attributes of the SEA.

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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