

Positive/Encouraging Comments received during Public Consultation Period 13 Oct thru 7 Nov 2025 incl

Comments	Crimson Response	Email	Letter
Email comment of support citing historic mining disturbance of the site, the project's positive overall environmental impacts, dedicated team, rigour of planning and environmental measures to limit the impact to environment and positive local and national economic impact.	Noted and thankyou for the support.	Y	
Shire has worked with the MGGP team for the past few years and partnered in several fire fighting training activities and looks forward to building on these emergency services possibilities in the future.	Noted and thankyou for the support.	Y	
Letter to Crimson support for the MGGP given the partnering of NMRG and Crimson in conservation initiatives which will materially improve Malleefowl conservation both locally and nationally.	Noted and thankyou for the support.	Y	Y
NACC NRM are familiar with the project and the proponent and has entered into a partnership to implement a significant Malleefowl habitat rehabilitation program in the region as part of its Offsets plan. The set of NACC NRM activities supported by Capricorn Metals directly aligns with our vision and goals for Biodiversity Conservation in NARvis. This project supports the vision that "Terrestrial biodiversity and ecosystem integrity are valued, maintained, improved and restored at a landscape scale". This partnership is enabling a material increase to conservation efforts in the region. Planned activities over the project period provide targeted and informed opportunity to improve Malleefowl habitat in the Northern Agricultural Region, with a focus on the Gunduwa Regional Conservation Association area and the traditional lands of the Badimia people.	Noted, thankyou for the support and the engagement to assist CMM in its preparation of Offsets for the Project..	Y	Y
Email in support of the MGGP citing the healthy working relationship, supported by a Co-operation Deed, AWC has had with CMM since 2024. In summary, AWC views Capricorn as a responsible, pragmatic and willing neighbour in the Mount Gibson area and, given its actions and undertakings thus far, AWC is encouraged and hopeful that the development of the MGGP will be constructive for AWC's conservation efforts in the area.	Noted and thankyou for the support.	Y	
Email in support of the MGGP, citing the good work completed on heritage surveys and the long term working relationship that has developed.	Noted and thankyou for the support.	Y	
Letter to Crimson in support of the MGGP citing Crimson's collaboration with the GRCA in the conservation priorities planned in respect of Malleefowl and tall eucalypt woodlands. The collaboration between Capricorn Metals and GRCA will generate invaluable new funding for regional biodiversity conservation and allow GRCA to materially increase its operations and conservation efforts in the region over the project period.	Noted and thankyou for the support.	Y	Y

Comment (high probability AI generated) submission 7 Nov 2025

Topic	No.	Sub topic	More specific	CMM Response
Euc Woodland (TEC)	2.1	Conservation Status and Regional Context		-
	2.2	Inadequate Assessment of TEC Impacts. The PER must provide:	Detailed mapping of all TEC patches within a 10 km radius of the project area	Regional State sourced and local TEC identified has been included and discussed in S 4.2.2 and illustrated in Fig 31. This includes patches up to 7km from the Development Envelope. Impacts to TEC have been assessed based on the locally defined TEC extent, any further detailed mapping/verification of regionally identified TEC to a local scale would only serve to reduce the Proposal impact to TEC.
			Analysis of the project's impact on landscape connectivity and genetic exchange	The PER and conservation advice detail the TEC is dominated by a complex mosaic of Eucalypt species over an understorey that is highly variable in structure and composition. As outlined in the Approved Conservation Advice (DoE, 2015) there is a lack of specific information about the ecological functional roles for most species that occur in the WA Wheatbelt Woodland TEC. The reductions in patch sizes are not expected to significantly alter any patch's functionality or current landscape connectivity or genetic exchange. The vegetation surrounding the WA Wheatbelt Woodlands in the Development Envelope is largely continuous and occurs extensively outside the Development Envelope, as opposed to the actual WA Wheatbelt region (where most of the known TEC occurs) which has been heavily fragmented by agriculture and therefore landscape connectivity and genetic exchange limited. As outlined in Section 5.4.1 of the PER, whilst salmon gum woodlands have experienced significant decline, this has occurred in the northern and eastern wheatbelt, with 96% of its distribution within the arid zone, which includes the Proposal, remaining uncleared. van Etten (2013) concluded that there was no evidence to indicate that the vegetation types in the Mummaloo area are rare or restricted in their distribution or likely to be threatened by the mining development.
			Assessment of edge effects extending beyond the direct clearing footprint	Edge effects have been discussed in the impact section of the PER. Patches with larger areas /boundaries are less exposed and more resilient to edge effect disturbances such as weed invasion (DoE, 2015). Therefore, patches 6, 7, 8 and 10, have the greatest potential risk of edge effects due to their size after Proposal implementation (less than 4 ha) and being adjacent to the Disturbance Footprint. As discussed in Section 5.4.1 of the PER, the likelihood of indirect impacts/edge effects from the Proposal, after avoidance, mitigation and management measures have been implemented, is considered low. Should any occur, they are expected to be short term and reversible as a result of the implemented avoidance, mitigation and management measures. Avoidance and mitigation actions outlined in Section 5.3, including implementation of Environmental Management Plans (Appendix P and Q), reduces any potential impacts to as low as reasonably practicable.
			Evaluation of cumulative clearing in the context of regional TEC distribution	Section 4.2.2 discusses the impact of clearing on the local TEC extent. As outlined in Section 5.2.1 of the PER, there are no cumulative impacts relevant to the WA Wheatbelt Woodlands TEC in the region. The vegetation surrounding the WA Wheatbelt Woodlands in the Development Envelope is largely continuous and occurs extensively outside the Development Envelope, as opposed to the actual WA Wheatbelt region (where most of the known TEC occurs) which has been heavily fragmented by agriculture.
	2.3	Mining Scale and Duration Concerns	The PER does not adequately address how rehabilitation of such extensive disturbance can achieve pre-mining ecological function within ecologically relevant timeframes (decades to centuries for eucalypt woodland establishment).	Section 6 of the PER discusses offsets to offset the residual impacts of the Proposal including clearing/disturbance to MNES. The post public PER includes a new section detailing mine site rehabilitation. As is standard practice in mine site rehabilitation, there is no intent that eucalypt woodlands will have reached full maturity to meet site completion criteria, rather the rehabilitated landscape is established, self sustaining, and progressing to maturity.
Malleefowl (Leipoa ocellata) - Inadequate Protection Measures	3.1	Species Vulnerability and Decline	The species faces multiple threatening processes including: habitat loss and fragmentation, predation, inappropriate fire regimes and climate change	-
	3.2	Critical Habitat Requirements	MF require; semi-arid to arid shrublands and low woodlands with sandy substrates; Abundant leaf litter for mound construction (approximately 4 tonnes per mound); Long-unburnt habitat (breeding success reduced for up to 40 years post-fire); Large home ranges due to low food resource density.	-
	3.3	Project-Specific Concerns	Direct Habitat Loss: The assessment must quantify; Number of active mounds within the project footprint and 5 km buffer; Total habitat loss in hectares of suitable vegetation types; Proportion of local population affected	Section 4.4 of the PER outlines (and shows on Figures) two active (as at 2024) mounds and eight inactive mounds that are within the Disturbance Footprint. The PER also describes the number of mounds within the Development Envelope (outside the Disturbance Footprint), and mounds recorded in the surrounding area, the hectares of habitat to be cleared, and the proportion of the local population that may be affected.
			Indirect Impacts include; Noise and vibration disturbance during breeding season (April-November); Light pollution affecting nocturnal predator-prey dynamics; Increased vehicle strike risk on access roads; Facilitation of predator access via linear infrastructure; Altered fire regimes from ignition sources and vegetation clearing	Indirect impacts, including noise and vibration, light pollution, vehicle strikes, feral fauna and altered fire regimes have been discussed in Section 5 of the PER.
			Cumulative Impacts: The PER fails to assess cumulative impacts from other mining operations, agricultural clearing, and infrastructure development in the region.	Cumulative impacts (including from other mining operations) are detailed in Section 5.2 of the PER. Except mining operations, there is little to no infrastructure development in the surrounding region and the Proposal is not located in the agricultural region, being approximately 20 km north and 40 km east from the edge of the heavily cleared wheatbelt agricultural zone.

Comment (high probability AI generated) submission 7 Nov 2025

Topic	No.	Sub topic	More specific	CMM Response
Chuditch/Western Quoll (Dasyurus geoffroii) - Critical Gaps in Assessment	4.1	Conservation Status and Historical Decline	The Chuditch is listed as Vulnerable under the EPBC Act and is Western Australia's largest endemic carnivorous marsupial. The species has disappeared from >90% of its former range (which covered 70% of the Australian continent) following European settlement (Glen et al., 2009; Department of Environment and Conservation, 2012). Current distribution is largely restricted to south-western Western Australia, with persistence primarily attributed to sustained fox and cat control programs such as Western Shield.	-
	4.2	Threatening Processes	Primary threats include; Predation by foxes and feral cats (the most significant threat); Land clearing and habitat fragmentation; Secondary poisoning from rodenticide consumption; Inappropriate fire regimes; Vehicle strike; Competition for food resources with introduced species	-
	4.3	Project-Related Concerns	Habitat Requirements;The project must; Identify and map all denning sites within and adjacent to the project area; Assess impacts on riparian vegetation which provides critical habitat; Evaluate loss of foraging habitat and prey abundance	Section 4.5.2 of the PER outlines that no evidence of Chuditch (and therefore denning sites), has been recorded in the Development Envelope. The translocated animals have dispersed widely, with most records to the north-east of the Development Envelope, where releases were made. There is no vegetation meeting the definition of riparian vegetation in the Development Envelope. Section 5.2 of the PER provides an impact assessment associated with the Proposal, including habitat clearing and degradation, and lighting
			Predator Management ; The PER must demonstrate how the project will maintain or enhance regional predator control effectiveness throughout the 17-year mine life and into closure	The PER details that feral predator control will be undertaken in conjunction with AWC, including provision of funding for deployment of felixer cat control units; collaboration with the National Malleefowl Recovery Group to conduct long term feral predator control to determine the benefit of reducing the abundance of introduced predators such as foxes and cats.
			Rodenticide Risks; The PER must mandate use of non-anticoagulant alternatives and implement monitoring programs to detect sub-lethal impacts.	Consideration will be given to non-anticoagulant rodenticides. If anticoagulant rodenticides are used, they will be first Generation, requiring multiple feeds to be lethal, making them less likely to cause secondary poisoning.
Southern Whiteface - Recently Listed Species			Given the recent listing and limited survey effort specifically targeting this species, the PER should include: Targeted surveys during appropriate seasons using species-specific call playback techniques; Assessment of suitable habitat availability within dispersal distance; Analysis of indirect impacts from habitat modification in adjacent areas; Consideration of cumulative impacts on regional population viability	The Proponent believes the PER adequately addresses these items. As detailed in the PER, a supplementary targeted survey was undertaken in September 2024 (during breeding season) and included a total of 51 km of transects traversed during searches for Southern Whiteface. 11 motion sensitive cameras were also deployed across the Proposal, giving a total camera effort of 627 days. Surveys were undertaken by suitably qualified ecologists with extensive experience in WA fauna. Habitat assessment has been included in the PER in Section 4.6.3, impacts (including cumulative impacts on fauna habitat) have been discussed in Section 5 of the PER.
Insufficient Analysis of Climate Change Impacts	6.1	Threat Multiplier Effects	Projected changes for the Western Australian Wheatbelt include: Increased temperature extremes; Reduced rainfall and increased drought frequency/severity; Altered fire regimes (increased frequency and intensity); Shifts in phenological timing affecting plant-pollinator and predator-prey relationships	-
	6.2	Species-Specific Vulnerabilities	Malleefowl. Mining-induced habitat loss compounds these climate-driven declines by: Reducing available refugia during extreme events; Fragmenting populations and limiting adaptive capacity; Removing genetic diversity needed for climate adaptation	-
			Chuditch. Climate change may alter prey availability and distribution, requiring larger home ranges to maintain energy balance. Increased fire frequency threatens den sites in hollow logs and may force animals into suboptimal habitat where predation risk is elevated	-
			Wheatbelt TEC: The Critically Endangered status reflects inability of these woodlands to regenerate under current conditions. Climate change exacerbates regeneration failure through: Increased seedling mortality during establishment; Extended drought periods exceeding species' tolerance; Altered competitive dynamics favouring weeds; Increased fire frequency preventing maturation to reproductive age	-

Comment (high probability AI generated) submission 7 Nov 2025

Topic	No.	Sub topic	More specific	CMM Response
	6.3	PER Deficiencies	The assessment must: Model projected climate conditions at project mid-point (2033) and closure (2042); Evaluate species' adaptive capacity under combined mining and climate stressors; Design rehabilitation programs using climate-adapted species assemblages and analogues; Incorporate climate change into offset site selection and management	Section 5.2.9 of the PER details that climate change predictions are subjective and difficult to anticipate and a review of long term rainfall data at BoM's Goodlands weather station (# 10026) from 1924 – 2024 and mean maximum temperature data at BoM's Dalwallinu weather station (# 8297) from 1998 – 2024 found no evidence to suggest long term drying is occurring (BoM, 2023a). Higher summer rainfall will likely result in higher evaporation rates, however long term trends of this nature are difficult to define as summer rainfall in the Proposal area can also be influenced by tropical cyclones to the North. As discussed in the PER, progressive rehabilitation will commence early in the operational phase and regrowth is expected to reach maturity in 10-20 years, which is considered a very short time period in the context of climate change. Considering this, if regrowth vegetation is affected by climate change, so will the surrounding remnant vegetation, fauna and their habitat, which will be reflected in the rehabilitation monitoring program which includes monitoring of reference sites (undisturbed vegetation) at the same time as rehabilitation sites. The post public PER includes a new section detailing mine site rehabilitation, including where monitoring indicates that progress towards meeting the completion criteria is not progressing as necessary, contingency actions will be implemented, which may include additional revegetation works, which would consider any affects of, and native species responses to, climate change. Section 6.2 of the PER outlines that Malleefowl offset site selection includes an assessment of climate change projections and likely climatic constraints at the site using the Climate Change in Australia Projection Tools.
Cumulative Impact Assessment Failures	7.1	Regulatory Requirements	The EPBC Act requires assessment of cumulative impacts from the proposed action in combination with other past, present, and reasonably foreseeable future actions (Department of Environment, 2013). For threatened species and communities at high risk of extinction, cumulative impact assessment is essential to understanding whether additional loss is tolerable from a population viability perspective.	Noted, cumulative impacts where they occur and are relevant to the Proposal location, have been included in Section 5 of the PER and considered in the residual impact assessment
	7.2	Regional Context	The Western Australian Wheatbelt has experienced unprecedented landscape transformation: Historical clearing removing >85% of native vegetation; Ongoing agricultural intensification; Multiple mining projects (gold, iron ore, industrial minerals); Infrastructure expansion (roads, powerlines, telecommunications); Climate change impacts already manifesting	Noted, as outlined in the PER, although the Proposal is located within the upper northeastern corner of the Avon Wheatbelt Bioregion of the Interim Biogeographic Regionalisation of Australia (IBRA) it is located approximately 20 km north and 40 km east from the edge of the heavily cleared wheatbelt agricultural zone. The Proposal is approximately 10 km southeast of the Yalgoo Bioregion and due to this proximity, soils and flora/vegetation within the Development Envelope display greater similarities with the Yalgoo bioregion.
	7.3	Assessment Gaps	The PER does not provide adequate cumulative impact assessment for any EPBC-listed species or community. Required analysis includes: For Wheatbelt TEC: • Total TEC clearing in the past 10 years within the relevant IBRA subregion • Approved but not yet implemented clearing • Proposed clearing in submitted but not determined referrals • Analysis of whether additional loss is consistent with recovery objectives • Evaluation of regional TEC condition trajectory	Cumulative impacts where they occur and are relevant to the Proposal location, have been included in Section 5 of the PER and considered in the residual impact assessment As outlined in the PER, although the Proposal is located within the upper northeastern corner of the Avon Wheatbelt Bioregion of the Interim Biogeographic Regionalisation of Australia (IBRA) it is located approximately 20 km north and 40 km east from the edge of the heavily cleared wheatbelt agricultural zone. There are no cumulative impacts relevant to the WA Wheatbelt Woodlands TEC in the region. The vegetation surrounding the WA Wheatbelt Woodlands in the Development Envelope is largely continuous and occurs extensively outside the Development Envelope, as opposed to the actual WA Wheatbelt region (where most of the known TEC occurs) which has been heavily fragmented by agriculture. The Proponent is not aware of any approved but not yet implemented clearing or other referrals submitted but not yet determined relevant to the Proposal. The Consideration of Significant Impact Guidelines – WA Wheatbelt Woodlands table in the PER includes an assessment of Proposal impacts against the recovery objectives of the TEC. The Proponent is not responsible for regional TEC condition and the Proposal is unlikely to impact the condition of TEC outside the Development Envelope
			For Threatened Fauna: • Regional population size and distribution • Trend analysis (declining, stable, increasing) • Other known impacts in the region (mining, agriculture, infrastructure) • Assessment of whether local population can sustain additional loss • Consideration of meta-population dynamics and source-sink dynamics	Local population size and distributions are discussed throughout the PER, analysis of regional population size would only serve to further reduce Proposal impacts on relevant MNES. The lack of publicly available monitoring data for MNES in the region means trend analysis are difficult to undertake. Notwithstanding this, the PER includes consideration of the Proposal against Significant Impact Guidelines for each MNES, of which the Proposal is not considered likely to lead to a long-term decrease in the size of a population of any MNES. Cumulative impacts where they occur and are relevant to the Proposal location, have been included in Section 5 of the PER and considered in the residual impact assessment. Fragmentation and habitat loss impacts have been discussed in the PER. Fauna habitat types and vegetation in the Disturbance Footprint are common in the locality and exist contiguously surrounding the Development Envelope, therefore there are no known sink areas in the local region.

Comment (high probability AI generated) submission 7 Nov 2025

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Offset Strategy Concerns	8.1	Limitations of Offsets for Critically Endangered Communities	For Critically Endangered ecological communities facing "extremely high risk of extinction in the wild in the immediate future," offsets present several fundamental problems: Temporal Lag: Eucalypt woodland restoration requires decades to centuries to achieve structural and functional equivalence to mature systems. This timeframe exceeds the 10-year indicative window for extinction risk, meaning offsets cannot address immediate extinction threats. Ecological Equivalence: Recreated or restored woodlands do not provide equivalent ecosystem services and biodiversity values to intact remnants, particularly for specialist species with narrow ecological requirements and long-lived species dependent on habitat continuity. Certainty: Restoration outcomes are inherently uncertain, particularly in degraded landscapes subject to ongoing threatening processes (weeds, altered hydrology, fragmentation, climate change). Success cannot be guaranteed at project approval. Additionality: In heavily cleared landscapes, most potential offset sites are already subject to protection under other legislation or initiatives, questioning whether offsets provide genuinely additional conservation benefits	The offset program has been developed in consultation with DCCEEW, and in accordance with the EPBC Act Environmental Offsets Policy The offsets proposed in the PER do not include Eucalypt woodland restoration, rather maintenance and protection (e.g. conservation estate) of existing TEC woodland at Mummaloo. The direct offset of Revegetation of Malleefowl Habitat in Degraded Wheatbelt Agricultural Land has a 20 year duration and the PER and Revegetation Plan detail a risk assessment, management actions for threatening processes and contingencies should targets and completion criteria not be met. In the heavily cleared landscape, the areas selected for Malleefowl habitat restoration are degraded farmland, not under other legislation or initiatives and not currently suitable as use by Malleefowl. Section 6.2.1 of the PER explains how revegetation of this land will provide benefit to Malleefowl.
	8.2	Offset Calculation Methodology	If offsets are proposed, the PER must transparently document: Offset calculation methodology and all input parameters; Quality assessment of impact and offset sites using standardized metrics; Confidence levels for attribute assessments; Time until ecological benefit realization; Risk of offset failure and contingency measures; Financial provisions for long-term offset management (50+ years); Legal mechanisms ensuring offset permanence	The offset program has been developed in consultation with DCCEEW, and in accordance with the EPBC Act Environmental Offsets Policy. DCCEEW apply their own methodology and input parameters to the calculator to determine the final offset required, therefore the calculation methodology used by the Proponent is irrelevant. The post public PER includes Habitat Quality Score rating tool assessment for all impact and direct offset sites. Risks and contingency measures are included in the PER. The post public PER includes a management action 'Proponent will work to ensure offset sites under revegetation are protected in perpetuity via Conservation Covenant with land holders' and corrective action of 'where Conservation Covenants are not possible, proponent will look to transfer the land to a partner such as AWC for such protection or acquire sufficient land directly for the same purposes.'
	8.3	Direct Offsets vs. Financial Contributions	Direct land-based offsets are strongly preferred over financial contributions to research or programs. Financial offsets do not provide immediate, quantifiable conservation gains for affected species and communities. If direct offsets are proposed, they must: Contain the same threatened species/community as impacted; Be of equal or higher ecological condition; Have secure land tenure and management commitment; Address the same key threats; Provide conservation gains beyond business-as-usual	Noted, the PER details proposed direct offsets as far as possible, with indirect offsets proposed as supplementary. The offset program has been developed in consultation with DCCEEW. The Proponent believes the direct offsets proposed meet the requirements with the EPBC Act Environmental Offsets Policy.
Inadequate Rehabilitation Standards and Completion Criteria	9.1	Mine Closure Realities	Australia has over 50,000 abandoned mines, most not meeting modern rehabilitation standards (Soe, 2021). This legacy demonstrates that achieving meaningful rehabilitation at mining sites is challenging, particularly in water-limited environments with slow natural regeneration rates.	Most abandoned mines are decades old (Soe, 2021) and historically were operated without consideration or requirement for meaningful rehabilitation and closure. Current day mining programs consider closure in the planning and development phase, such as landform design and placement of hostile materials. In Western Australia, mining operations are regulated through the Mining Act 1978 and required to operate under a (state regulator) approved Mine Closure Plan, which outlines rehabilitation methods, completion criteria and corrective actions. Additionally, WA has a Mining Rehabilitation Fund Act 2012, whereby all tenement holders are required to report disturbance data and contribute annually to the fund, with higher contributions required for higher areas of disturbance. This acts as an incentive to tenement holders to undertake rehabilitation as soon as possible to reduce their annual financial liability, whilst enhancing the State's capacity to manage and rehabilitate abandoned mines, leading to better environmental and community safety outcomes.
	9.2	Completion Criteria Requirements	The PER must specify measurable, quantitative rehabilitation completion criteria including; Vegetation structure; Ecosystem Function, Fauna Habitat Values; Weed Control; Temporal Requirements	The post public PER includes a general overview section for mine site rehabilitation, however, mine site closure is regulated by State government agencies under Part IV of the Western Australian Environmental Protection Act 1986 and the Mining Act 1978.
	9.3	Financial Assurance	Given the centuries-long timeframe for eucalypt woodland maturation, financial assurance must be adequate to fund: Active rehabilitation implementation; Decades of monitoring and maintenance; Adaptive management responses to rehabilitation failure; Long-term site management and monitoring post-closure; Contingency for climate change impacts on rehabilitation success	The offsets proposed in the PER do not include Eucalypt woodland restoration, rather maintenance and protection (e.g. conservation estate) of existing TEC woodland at Mummaloo. Section 6.2.2. and 6.3 of the PER detail the offset program, including a risk assessment, management actions and corrective actions for risks including climate change.
Alternatives Assessment Inadequacy	10	Location, Operational, Timing and No Action Alternatives not comprehensively evaluated	For each alternative, the PER must provide quantitative comparison of environmental outcomes, not just economic considerations.	Environmental outcomes associated with Proposal alternatives, including the No Action alternative, have been discussed in Section 2.3 of the PER. The location of the Proposal is constrained by the location of the mineral deposits and there are no location alternatives. Operational management actions (such as progressive clearing, no clearing of active Malleefowl mounds during breeding season, potential for backfilling) have been considered and incorporated into the Proposal to minimise impacts as far as practical.

Comment (high probability AI generated) submission 7 Nov 2025

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Monitoring and Adaptive Management Deficiencies	11	Monitoring Program Requirements	The PER must specify: Threatened Species Monitoring: • Population abundance and demographic parameters • Breeding success rates (Malleefowl mound activity) • Spatial distribution and habitat use • Evidence of predation (scat analysis, camera traps) • Body condition and reproductive health indicators TEC Condition Monitoring: • Fixed plot floristic surveys (minimum 5-year intervals) • Structural parameters (tree recruitment, canopy health) • Threatening processes (weed invasion, dieback, fire) • Reference site comparison Impact Detection: • Control-impact-before-after (BACI) design • Sufficient statistical power to detect 20% change • Spatially explicit sampling capturing gradient of impact • Peer-reviewed methodologies	The post public PER outlines monitoring actions, timeframes and corrective actions that have been designed to capture the progress towards the relevant Proposal completion criteria.
	11	Adaptive Management Triggers	The PER must specify quantitative triggers initiating adaptive management responses: 20% decline in local Malleefowl population or breeding activity; Detection of predator population increase in project area; TEC condition decline >1 condition class; Rehabilitation not meeting trajectory predictions; Offset site threatening process escalation	The post public PER outlines monitoring actions and targets that have been designed to capture the progress towards the relevant Proposal completion criteria, and includes corrective actions should targets and/or completion not be achieved.
	11	Independent Verification and Reporting	Monitoring should include independent verification by qualified ecologists not employed by the proponent. Results should be publicly available with annual reporting and 5-year comprehensive reviews	Monitoring will be undertaken by suitably qualified environmental personnel, which may/may not include personnel employed by the Proponent in the Environment Department. As detailed in Section 6.5 of the PER, the annual (post Proposal approval) compliance report will address how the conditions of the offsets, environmental outcomes, or milestones are met and the progress on management actions during the 12-month period. A copy will be provided to the DCCEEW at the time of publishing and stored for periodic technical review and evaluations of the monitoring program and timeframes for implementing program components. A relevant review committee, including a suitably qualified ecologist, will undertake the periodic technical review and evaluation of the plan. Technical reviews will address, at a minimum, monitoring risks and response to risk levels and changing circumstances.
Inadequate Reference to Rec'y & Threat Abatement Plans	12		The PER must demonstrate consistency with: MF & Chuditch Recovery Plans; Predation (feral cat) Threat Abatement plan and Cons Advice for TEC	The PER discusses Recovery Plans, Threat Abatement Plan and TEC Conservation Advice throughout the document and how the Proposal has been developed in consideration of these documents.
Recommendations	13	Assessment Requirements	1. Conduct comprehensive, multi-season surveys for all EPBC-listed species using standardised, peer-reviewed protocols 2. Complete detailed TEC condition assessment and mapping extending 10 km from project boundary 3. Undertake quantitative cumulative impact assessment at regional scale for all EPBC matters 4. Model climate change impacts on threatened species and TEC over project lifetime 5. Provide transparent alternatives assessment with quantitative environmental outcomes comparison	1. Comprehensive baseline studies and investigations have been undertaken to understand the environmental, economic and social values of the Proposal and surrounds. The work was undertaken by suitably qualified personnel with extensive knowledge of the Western Australian flora/fauna. 2. Local TEC identified mapping includes patches up to 7km from the Development Envelope. Impacts to TEC have been assessed based on the locally defined TEC extent, any further detailed mapping/verification of regionally identified TEC to a local scale would only serve to reduce the Proposal impact to TEC. 3. Cumulative impacts where they occur and are relevant to the Proposal location, have been included in Section 5 of the PER and considered in the residual impact assessment 4. Section 5.2.9 of the PER details that climate change predictions are subjective and difficult to anticipate. Section 6.2.2 and 6.3 of the PER detail the offset program, including a risk assessment, management actions and corrective actions for risks including climate change. 5. Environmental outcomes associated with Proposal alternatives, including the No Action alternative, have been discussed in Section 2.3 of the PER.

Comment (high probability AI generated) submission 7 Nov 2025

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	13	Design Modifications	6. Redesign project to avoid all areas of TEC and high-quality threatened species habitat 7. Minimise clearing footprint through: pit optimisation, co-location of infrastructure, and progressive rehabilitation 8. Implement seasonal constraints during Malleefowl breeding season (April-November) 9. Design infrastructure to minimise habitat fragmentation (fauna crossings, revegetation corridors)	6. The Proposal has been designed to avoid and minimise impacts to areas of highest ecological value within the Proposal. The residual impacts are unavoidable, and offsets have been proposed for those considered significant residual impacts to MNES. 7. The Proposal has been designed to avoid or minimise potential impacts as far as reasonably practicable. The PER discusses progressive rehabilitation. 8. The PER details that there will be no Malleefowl mounds cleared during the breeding season without prior assessment of mound activity (in accordance with the National Malleefowl Monitoring Manual (National Malleefowl Recovery Team 2020)). Active mounds (as determined by the National Malleefowl Monitoring Manual) will not be cleared during Malleefowl breeding season. 9. The PER outlines the Disturbance Footprint will increase the boundary of an 'island' of disturbed land within the surrounding, continuous native vegetation and is not expected to pose any change to the landscape permeability for fauna, including Malleefowl. Linear infrastructure (such as roads, pipelines, bunds etc.) have the potential to pose a barrier to fauna movement for some smaller, ground-dwelling, non-volant fauna but, given the scale of the Proposal, and the vast areas of surrounding native vegetation, this is expected to have negligible impact on the connectivity of MNES fauna populations. The impacts of habitat clearing and fragmentation, and mitigation and management actions have been discussed in the PER.
	13	Mitigation and Management	10. Develop and implement comprehensive predator control program exceeding regional baseline effort 11. Prohibit anticoagulant rodenticides; mandate alternative control methods 12. Establish impact-free buffer zones around confirmed Malleefowl mounds (minimum 1 km) 13. Implement best-practice weed hygiene and fire management protocols 14. Design rehabilitation using climate-adapted species assemblages and reference ecosystems	10. Implementation of feral predator monitoring and control will be undertaken in partnership with AWC (to support and enhance their existing program) and the National Malleefowl Recovery Group to continue the Adaptive Management Predator Experiment (AMPE) to determine the benefit of reducing the abundance of introduced predators, particularly foxes, on Malleefowl populations. 11. Consideration will be given to non-anticoagulant rodenticides. If anticoagulant rodenticides are used, they will be first Generation, requiring multiple feeds to be lethal, making them less likely to cause secondary poisoning. 12. The PER discusses Malleefowl mounds and monitoring that consistently showed no relationship between distance from mining and mound activity, with known records of mounds being worked <50m of clearing being carried out. Proposal avoidance, mitigation and management measures are included in Section 5.3 of the PER. 13. Section 5.3.3 and 5.3.10 outline mitigation measures that will be implemented to manage the risk of invasive species and fires. 14. As discussed in the PER, progressive rehabilitation will commence early in the operational phase and regrowth is expected to reach maturity in 10-20 years, which is considered a very short time period in the context of climate change. Considering this, if regrowth vegetation is affected by climate change, so will the surrounding remnant vegetation, fauna and their habitat, which will be reflected in the rehabilitation monitoring program which includes monitoring of reference sites (undisturbed vegetation) at the same time as rehabilitation sites. The post public PER includes a new section detailing mine site rehabilitation, including where monitoring indicates that progress towards meeting the completion criteria is not progressing as necessary, contingency actions will be implemented, which may include additional revegetation works, which would consider any affects of, and native species responses to, climate change.
	13	Offsets	15. If impacts are unavoidable, provide direct land-based offsets at ratios reflecting TEC criticality (minimum 10:1) and species vulnerability 16. Ensure offset sites contain the same threatened communities and species 17. Secure offsets in perpetuity through binding legal agreements 18. Implement offset management before impact occurs 19. Provide adequate financial assurance for long-term offset management (50+ years)	The offset program included in the PER has been developed in consultation with DCCEEW, and in accordance with the EPBC Act Environmental Offsets Policy.
	14	Monitoring and Reporting	20. Implement scientifically robust monitoring programs with BACI design and adequate statistical power 21. Establish clear, quantitative adaptive management triggers with pre-determined responses 22. Ensure independent verification and public reporting of monitoring results 23. Commit to minimum 15-year post-closure monitoring	The post public PER details monitoring programs, timings, targets and corrective actions for targets/completion criteria not being met. As detailed in Section 6.5 of the PER, the annual (post Proposal approval) compliance report will address how the conditions of the offsets, environmental outcomes, or milestones are met and the progress on management actions during the 12-month period. A copy will be provided to the DCCEEW at the time of publishing and stored for periodic technical review and evaluations of the monitoring program and timeframes for implementing program components. A relevant review committee, including a suitably qualified ecologist, will undertake the periodic technical review and evaluation of the plan. Technical reviews will address, at a minimum, monitoring risks and response to risk levels and changing circumstances.

Comments received (one day late) on 8 Nov 2025

Topic	No.	Sub topic	More specific	CMM Response
Malleefowl Offsets and offsets quantum	1	No evidence is provided that Malleefowl are present at or near the proposed offset site/s. There is a very considerable risk that the revegetation offset will provide no conservation gain to the species unless the site is connected to habitat occupied by the species, such as habitat containing active mounds		NACC NRM Revegetation Standards, Methodology and Monitoring Approach outlines that sites will be identified and prioritised according to Malleefowl neighbourhood mapping and population viability assessment. The proven approach taken by NACC NRM in past restoration programs makes establishing landscape linkages a key deciding factor in land selection, significantly improving the likelihood of Malleefowl recolonising restored areas. Each offset site will have a Revegetation Plan developed by NAAC which includes the site selection criteria that must be met in deeming a site suitable to meet offset requirements. These include that the site must be able to sustain suitable vegetation types for supporting local Malleefowl populations and the site must be within known Malleefowl range and prioritised revegetation areas (as assessed against Parsons Malleefowl Neighbourhoods). Each Revegetation Plan will also detail the revegetation site location relative to known Malleefowl records. The Revegetation Plan for the first site (Fitzsimons) has been/will be provided to DCCEEW for approval, with subsequent sites to utilise this Plan as a detailed template.
	2	A habitat quality score is not provided for the impact site, and so one is unable to discern whether the quality score of 7/10 is sufficient to meet policy objectives;	- proposed offset management measures may not be adequate to attain the desired future quality; - the Strategy's monitoring, reporting and adaptive management regime is not suited to monitoring progress towards, likely or actual attainment of the quality score of 7/10; and - Strategy implementation is unlikely to trigger timely and effective corrective actions if Crimson is failing/fails to achieve the desired future quality.	The post public PER includes a HQS for the impact site, being VSA 1 and VSA 2 within the Disturbance Footprint scored as an averaged 8/10 (Optimal), whilst VSA 3 to VSA 6 have been scored as an averaged 3.25 (Marginal) and VSA 7 and VSA 8 considered Limited to Unsuitable. A HQS rating tool has now been developed and will be included in the post public PER and each Revegetation Plan and used for assessment against the completion criteria of revegetation sites achieving a 7/10. The Revegetation Plan details completion criteria (year 20), milestone targets (years 3,5,10), monitoring and corrective actions if targets are not met.
	3	no method is proposed for consistently assessing Malleefowl habitat quality, on a 0-10 scale, at the impact and offset sites at project commencement, and that can be used to demonstrate attainment of 'future quality with offset'		
	4	there is no indication or commitment to a plausible timeframe to attain the quality score of 7/10, across the entire offset site		
Euc Woodland (TEC) Information	1	Table 42 claims that a 100% direct offset will be achieved by protecting 34ha of Eucalypt Woodland TEC from approved iron ore mining, and weed and fire management to maintain offset quality at a score of 8/10;	As with the Malleefowl offset, key information for Woodland TEC offset decision-making is lacking. There is no: - quality score for the impact site, although I assume this to be at most 8/10; - method for consistently assessing and monitoring TEC quality, on a 0-10 scale, at the impact and offset sites, and that enables a repeatable differentiation between e.g. 7/10 and 8/10; and - proposed timeframe for the period over which, under management by Top Iron Pty Ltd, Woodland TEC condition is likely to decline from 8/10 to 7/10.	The post public PER includes a habitat rating tool for the impact site TEC, being 7. The proposed offset has been revised to a size of 135.8 ha with a start quality of 8/10, future without offset 6/10, and future with offset 8/10. This provides an offset value of 127%. The HQS will be used for assessment against the completion criteria of MIOP maintaining a HQS of 8/10.
	2	Table 50: 'Offset Values for the Mummalo offset site' claims 104% direct offset by reference to 35.2ha and offset site start quality of 8/10, future without offset quality of 0/10 and future with offset quality of 8/10.		