

# MARDIE SALT AND POTASH PROJECT

## ABORIGINAL CULTURAL HERITAGE MANAGEMENT PLAN

3	26 July 2024	Overall document update	Jacqui Jones	Snyman Van Straaten	Shaun Meredith
2	11-Nov-2022	Optimised Mardie Project (OMP) Assessment No. 2336	Janelle Fell	Angela Glover	Angela Glover
1	01-Feb-2022	MS1175 Requirements	Janelle Fell	Angela Glover	Angela Glover
0	02-Dec-2021	Issued for Use	Janelle Fell	Angela Glover	Angela Glover
A	02-Nov-2021	Draft for review	Janelle Fell	Angela Glover	Angela Glover
Revision	Date	Description	Author	Checker	Approver
Document Number		0000-LH-PLN-0001			Total Pages: 97

*Electronic documents, once printed, are non-controlled and may become outdated.*

Refer to Electronic Document Management System for the current version.

## REVISION SUMMARY

Section	Section Title	Key Changes
1	Definitions	Language changes to reflect OMP Acknowledgement of changing legislation, including sections of ACHA and terms of reference
1.1	Definitions	Removed Aboriginal Cultural Heritage Act 2021 (WA)/ACHA & update to definitions to reflect the AHA.
2	Purpose	Reflecting upcoming Legislation changes and revised community expectations of standards around Heritage management Section removed outlining history of RRKAC NT claim area Updated Environmental Conditions for the Mardie Project, including the Optimised Mardie Project, provided by the State Government on 19 October 2023, through Ministerial Statement 1211
2.1	Purpose	Removed section referring to Aboriginal Cultural Heritage Act 2021 and update to the Ministerial Statement No. from 1175 to 1211
2.2	Purpose – Figure 1 Mardie Project Footprint	Figure updated to reflect revised project footprint
2.3	Purpose – Figure 2: Native Title Determination Boundaries	Figure updated to reflect revised project footprint
3.1	Traditional Owner Groups	Grammatical changes
3.2	Land Access Deeds	Included reference to the RRKAC Supplement Deed
3.3	Legislation	Removed reference to ACHA
4.1	Compliance with BCI Systems	Additional information to clarify purpose of INX
4.4	Communication	Inclusion of notice of heritage works occurring on site
5.2	Aboriginal Heritage Site/Place - Types	Updated to reflect AHA review
5.2	Types	Comments re. forthcoming DPLH update of site types
6	Consultation and Fieldworks	Table 6 updated to reflect consultation undertaken November 2021 to July 2022, and July 2022 to July 2024
7.1	Heritage Surveys - Framework	- Changed to reflect updated LAD with YM People - Section added to include reference to intra-indigenous agreement between YM and RRK People - Addition to reflect that WAC must ensure inclusion of RRK People on surveys as per intra-indigenous agreement
7.2	Heritage Surveys - Summary of Reports	Table 3 - updated to include summaries of survey and salvage works undertaken in YM Determination Area to May 2024
7.2	Heritage Surveys - Summary of Reports	Table 4 - updated to include summaries of survey and salvage works undertaken in RRK Area

Section	Section Title	Key Changes
8	Summary of Section 18 Notices and Consents	Table 5 – Relevant Conditions of Consent added Table 5 – Notice Details added for 38619, 38638, and 38637 – not a site, rather a place and 17419 - name and consent date updated
9	Summary of Heritage Finds	Table 6 – updated to include additional survey results Table 7 – updated to include additional survey results
10.1	Measures to Protect Aboriginal Heritage – Key Hazards	Table 8 – Extra Mitigation strategy added under direct human contact
10.2	Measures to Protect Aboriginal Heritage – Heritage Sites Impacts and Management Strategies	Table 9 – Registered Site DPLH ID 17833 and 10536 inserted; Registered Sites DPLH ID 10537, 10351 and 38619 statuses updated; OHP 22932 and 22933 site descriptions updated – not reliably mapped on AHIS, no cultural salvage material found; OHP 38638 and OHP 38637 inserted
10.3	Heritage Sites Impacts and Management Strategies	Table 9 – Update to Peter’s Creek; extent of proposed impacts updated to reflect change in Pond 1 design, so no impact is made to Peter’s Creek Status or Proposed Mitigation – Updated to reflect demarcation and avoidance Mardie Salt 02 – Status updated to salvage and relocation complete April 2024. Disturbance not complete
10.4	Mardie Salt Project – Section 18 Status	Figure 3 Updated to reflect correct project footprint. Figure 4 Updated to reflect correct project footprint.
10.5	Measures to Protect Aboriginal Heritage – Archaeological Salvage	Updated to include terms of a section 18 or agreement with relevant Traditional Owner group; Updated to outline salvage recording documentation
10.5	Measures to Protect Aboriginal Heritage – Archaeological Salvage	Table 10 - Salvage Heritage Places YM Salvage Report Date column added The following Salvage ID sites were updated: <ul style="list-style-type: none"> <li>• Mardie Salt Salvage Pt 13 -18 – relocation area added</li> <li>• Mardie Salt Salvage Pt 49 -70 added</li> <li>• Mardie Salt Salvage Pt 71-77 – relocation area added</li> <li>• Mardie Salt Salvage Pt 78 added</li> <li>• Mardie Salt Salvage Pt 79 to 83 – relocation area added</li> <li>• Mardie Salt Salvage Pt 84-89 – added</li> <li>• Mardie Salt Salvage Pt 90 to 93 – relocation area added</li> <li>• Mardie Salt Salvage Pt 93-97 – added</li> <li>• Mardie Salt Salvage Pt 98 to 100 – relocation area added</li> <li>• New Port Access Road – added</li> </ul> Table 11 – Salvage Heritage Places RRK All sites updated to include relocation area

Section	Section Title	Key Changes
10.6	Measures to Protect Aboriginal Heritage – Demarcation of Heritage Sites	Addition of 'in the Development Envelope' to clarify area covered Table 12 – Demarcation Sites Sites BCI121-01 to BCI121-07 added and relocation area added if relevant; Mt Salt removed (outside Mardie Salt and Project footprint) MC (Mardie Creek) Exclusion Zone 1-3 added Figure 5 – Demarcation Sites updated to reflect new project footprint.
10.7	Aboriginal Heritage Incidents	Inclusion of PBC Heritage Manager to list of persons notified
10.8	Discovery of Human Remains	Inclusion of PBC Heritage Manager to list of persons notified
10.9	Measures to Protect Aboriginal Heritage – Monitoring, Auditing and Reporting	Inclusion of auditing and reporting

Table of Contents

1.	Definitions.....	1
2.	PURPOSE .....	3
3.	COMPANY COMMITMENTS AND OBLIGATIONS .....	6
3.1	Traditional Owner groups.....	6
3.2	Land Access Deeds .....	6
3.3	Legislation.....	6
4.	PROJECT PERSONNEL RESPONSIBILITY .....	7
4.1	Compliance with BCI Systems.....	7
4.2	Roles and Responsibilities .....	7
4.3	Induction and Cultural Awareness Training.....	7
4.4	Communication.....	7
5.	ABORIGINAL HERITAGE SITE / PLACE.....	8
5.1	Definition.....	8
5.2	Types .....	8
6.	CONSULTATION AND FIELDWORKS .....	9
7.	HERITAGE SURVEYS .....	12
7.1	Framework.....	12
7.2	Summary of Heritage Survey Reports .....	13
8.	SUMMARY OF SECTION 18 NOTICES AND CONSENTS.....	17
9.	SUMMARY OF HERITAGE FINDS .....	19
10.	MEASURES TO PROTECT ABORIGINAL HERITAGE .....	20
10.1	Key Hazards.....	20
10.2	Heritage Sites Impacts and Management Strategies .....	21
10.3	Ground Disturbing Activities / Ground Disturbance Permit .....	31
10.4	Aboriginal Monitoring of Ground Disturbing Activities.....	31
10.5	Archaeological Salvage.....	31
10.6	Demarcation of Heritage Sites.....	36
10.7	Aboriginal Heritage Incidents .....	39
10.8	Discovery of Aboriginal Sites (Excluding Human Remains) .....	39
10.9	Discovery of Human Remains.....	39
10.10	Monitoring, Auditing and Reporting .....	40
11.	PLAN REVIEW BY IMPLEMENTATION COMMITTEE .....	40
12.	APPENDICES .....	41
12.1	Appendix A – Reference Documents.....	41
12.2	Appendix B - BCI Cultural Heritage Policy.....	42
12.3	Appendix C - Ground Disturbance Procedure.....	43
12.4	Appendix D - Demarcation and Survey Procedure.....	44

12.5 Appendix E – Incident Reporting and Management Procedure .....	45
12.6 Appendix F - Aboriginal Heritage Management Guidelines for Contractors .....	46

## List of Figures

Figure 1: Mardie Project Footprint .....	4
Figure 2: Native Title Determination Boundaries .....	5
Figure 3: Mardie Salt Project – Section 18 Status .....	29
Figure 4: Mardie Salt Project – Heritage Status .....	30
Figure 5: Demarcation Sites .....	38

## List of Tables

Table 1: Definitions, Terminology and Abbreviations.....	1
Table 2: Summary of Consultations and Fieldworks.....	9
Table 3: Summary of Final Heritage Survey Reports – YM Determination Area .....	13
Table 4: Summary of Final Heritage Survey Reports – RRK Area.....	16
Table 5: Section 18 Notices and Consents .....	17
Table 6: Summary of Heritage Finds – RRK Area .....	19
Table 7: Summary of Heritage Finds – YM Determination Area .....	20
Table 8: Key Hazards to Aboriginal Heritage During Construction .....	20
Table 9: Heritage Sites Impacts and Management Strategies .....	22
Table 10: Salvage Heritage Places – YM.....	32
Table 11: Salvage Heritage Places – RRK.....	36
Table 12: Demarcation Sites.....	36

## 1. DEFINITIONS

Table 1: Definitions, Terminology and Abbreviations

Terminology or Abbreviation	Definition
Aboriginal cultural heritage	Has the meaning given to it by the WA Heritage Act and includes Aboriginal Objects and Aboriginal Sites.
<i>Aboriginal Heritage Act 1972 (WA)/AHA</i>	The Aboriginal Heritage Act affords protection to all Aboriginal sites which can be determined to meet its section 5 definitions, irrespective of whether it is known; has been assessed by the ACMC; or is on the Register of Sites, until the ACHA comes into effect
Aboriginal Heritage Site	Means an area identified to have cultural importance and significance to Aboriginal people. This includes but is not limited to registered heritage sites within the meaning of the AHA.
Aboriginal object	Has the meaning given to it by the WA Heritage Act and includes any "Significant Aboriginal Object" as defined in the Commonwealth Heritage Act.
Aboriginal site	Has the meaning given to it by the WA Heritage Act and includes: (a) Any "Significant Aboriginal Area" as defined in the Commonwealth Heritage Act; and (b) A "site of particular significance" within the meaning of section 237(b) of the Native Title Act,  Whether recorded or not.
ACH	Means Aboriginal Cultural Heritage
ACHMP	Means an ACH Management Plan (the Plan, this Plan) as defined in s177(1) of the AHA
ACMC	Aboriginal Cultural Materials Committee
Agree Site Management	Means the Agreed Site Management Measures contained in this ACHMP.
AHR	Aboriginal Heritage Regulations 1974 (WA)
ASX	Australian Securities Exchange
Avoidance	The relocation of Activities to avoid impacts on or harm to ACH and may include reasonable signage and fencing to protect the ACH from harm.
BCI	BCI Minerals Limited (ASX – BCI) <a href="http://www.bciminerals.com.au">www.bciminerals.com.au</a>
Construction	Means the period, from start to finish, of any Activity associated with the construction or post-construction development of the Project for the purposes of Commercial Production, within the ACHMP Area
Consult	Has the same meaning as in s100 of the ACHA, and consultation has a corresponding meaning
Contractor	Organisation engaged under contract by BCI including Contractor, Sub-Contractor, supplier, site supplier, vendor, seller
Cultural Consultant	Means an RRK person nominated by the Interested Current PBC to assist in the assessment of the location and extent of any ACH within an Agreed ACHMP Area
Department of Planning, Lands and Heritage/DPLH	The Department of Planning, Lands and Heritage (DPLH) means the department responsible for the administration of the Aboriginal Heritage Act 1972 (WA).
Exclusion Zone	Areas required to be fenced or flagged or otherwise excluded from all Activities in accordance with agreed site management measures.

Terminology or Abbreviation	Definition
Ground Disturbance Permit/GDP	Means a permit to conduct work that impacts, marks or disturbs the ground issued pursuant to the Ground Disturbance Procedure.
Ground Disturbing Project Operations	Means Project Operations that are not Low Impact Project Operations and which require machinery, earth moving and construction equipment, including track clearance, trenching, drilling, bulk sampling and construction works.
Harm	Has the meaning given in s15(17) of the AHA and includes to destroy or damage ACH.
Heritage Team	Means the person/s within BCI (and subsidiary entities) responsible for managing the Aboriginal heritage process and impact assessments.
Incident Notification Form	Means a notification in the form in Schedule 5
Incident Reporting and Management Procedure	Means the Incident Reporting and Management Procedure in Schedule 4
LAD	Land Access Deed
Licence to Operate Register	The register of BCIs legal obligations and commitments
Local Aboriginal Cultural Heritage Service (LACHS)	A designated Aboriginal corporation that facilitates management of cultural heritage for local Aboriginal people.
Low Impact Project Operations	Includes aerial surveys, geological mapping, metal detecting, rock chip, hand specimen and soil and drainage sampling, only using hand-held tools and non-ground disturbing environmental, topographical, geophysical (including electrical and magnetic) and other surveys and anything necessary or incidental thereto.
Mardie Project	Mardie Salt & Potash Project
Mardie Salt Project/Project	As shown in Figure 1
New Find	Means an object or a place, not previously identified, that is found during the conduct of Activities and is suspected to be ACH
New Find Preservation Zone	Means an area defined by a circle of ten metre radius centred on a New Find, or such area as determined by the Heritage Manager and agreed by the Company that is required to preserve and protect a New Find
Optimised Mardie Project	Expansion of the approved Mardie Project (Ministerial Statement No. 1175) including expanded concentrator and crystalliser ponds, an increased solar salt and SoP production rate, new secondary seawater intake option, a port facility laydown area, a quarry, and minor changes to the dredge channel.
Plan	Aboriginal Cultural Heritage Management Plan (ACHMP)
Project Operations	Means the exercise of BCIs rights in the area where Mining Act tenure is held.
Project Personnel	Staff, Contractors, Subcontractors, vendors, suppliers, and visitors to the Project
Protected Area	Has the same meaning as defined in S19 of the AHA.
Registrar	The person appointed under the AHA to administer the Register of Aboriginal Sites along with perform other functions as allocated under the Act.
Restricted Work Area (RWA)	Areas within which certain Activities are restricted in accordance with any Agreed Site Management Measures.
RM/Registered Manager	Registered Manager means a person who is appointed registered manager of a mine under section 33 of the Mines Safety and Inspection Act 1994.



Terminology or Abbreviation	Definition
RRK People	Robe River Kuruma People (formerly referred to as the KM People or Kuruma Marthudunera People), and “Robe River Kuruma person” means one of these people
RRK Protected Area	Means an Exclusion Zone, a Restricted Work Area, or a Protected Area within the meaning of the AHA that is within the RRK Area
RRKAC	Robe River Kuruma Aboriginal Corporation RNTBC (ICN 8355, ABN 68 799 375 226)
Salvage	May include collecting, bagging, tagging, cataloguing, or moving of an object of ACH from its location, and relocation to a safe place within the ACHMP Area decided by the Heritage Manager, a Heritage Officer, or a Nominated Senior Cultural Consultant (as the case may be) in agreement with the Company, which will not be unreasonably withheld
Section 16 consent	Means, subject to section 18, the authorisation given by the Registrar under the Aboriginal Heritage Act 1972 to enter upon and excavate an Aboriginal site and the examination or removal of any thing on or under the site in such a manner and subject to conditions the ACMC advise.
Section 18 consent	Means the consent given by the Minister for Aboriginal Affairs to the owner of any land to use the land subject of a heritage site for a specific purpose.
Site	Mardie Salt & Potash Project area
Traditional Owner groups	Refers to the YM People and the RRK People in their capacity as traditional owners, native title holders, agreement counterparts and custodians of the land the subject of the Mardie Salt Project.
WAC	Wirrawandi Aboriginal Corporation ICN 8870
YM People	Yaburara & Mardudhunera People

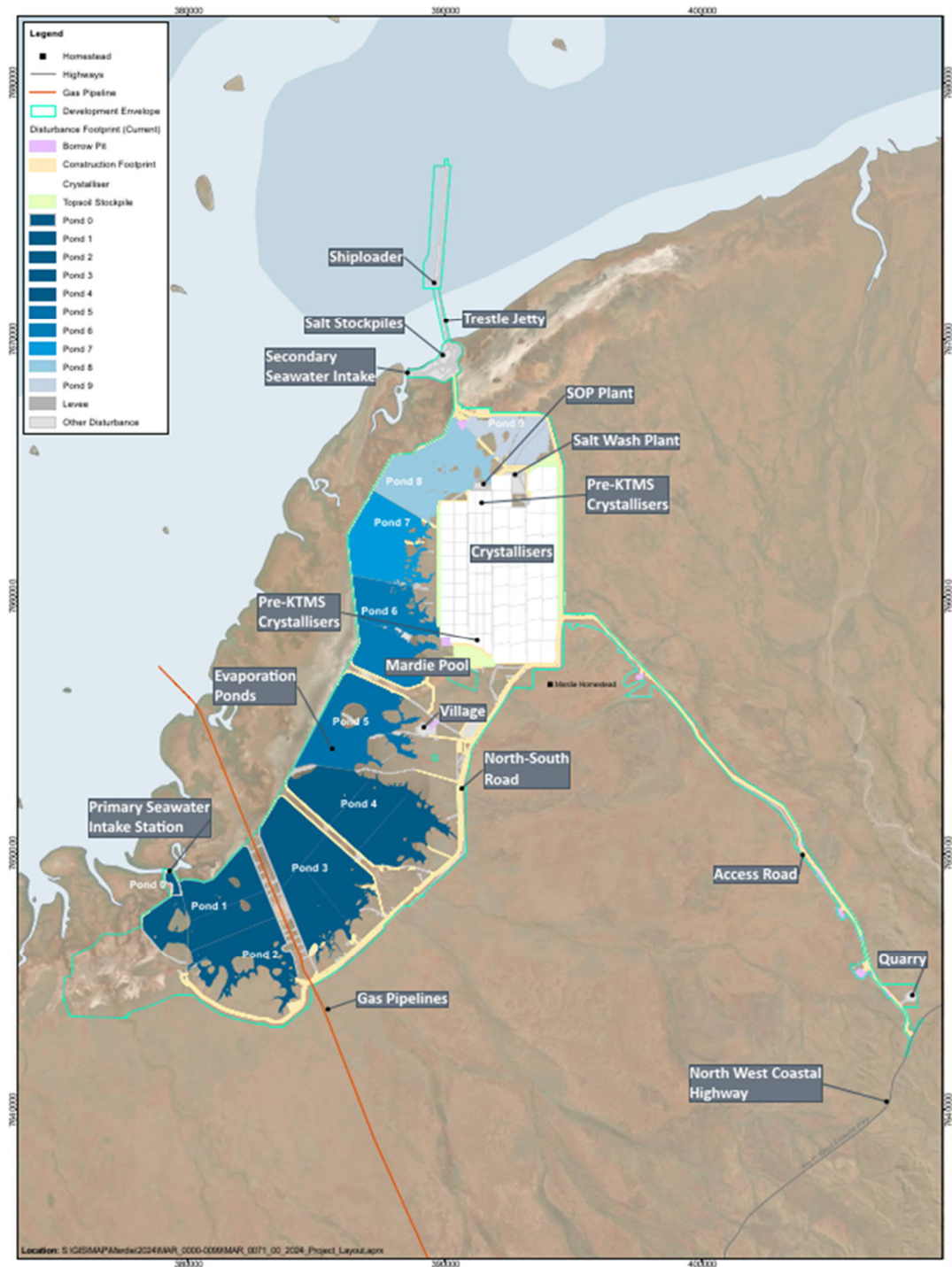
## 2. PURPOSE

The heritage management system at the Mardie Project consists of the executed LADs and this Plan to achieve the outcomes of Ministerial Statement No. 1211, and the Environmental Protection Authority's objectives for Social Surroundings.

This Plan describes the process for the ongoing management of Aboriginal heritage places located within BCI's Project as shown in Figure 1. This Plan sets out steps to be followed by the company, contractors and all employees to identify and manage Aboriginal heritage that may be affected by the Project in a manner that complies with Legislation, the LADs with the relevant Traditional Owner groups and the commitments made to these groups.

This Plan sets BCI's requirements for Project Personnel and goes beyond the minimum legislative requirements and is intended to reflect best practice and what is expected by Traditional Owner groups to manage and protect Aboriginal heritage.

Figure 1: Mardie Project Footprint



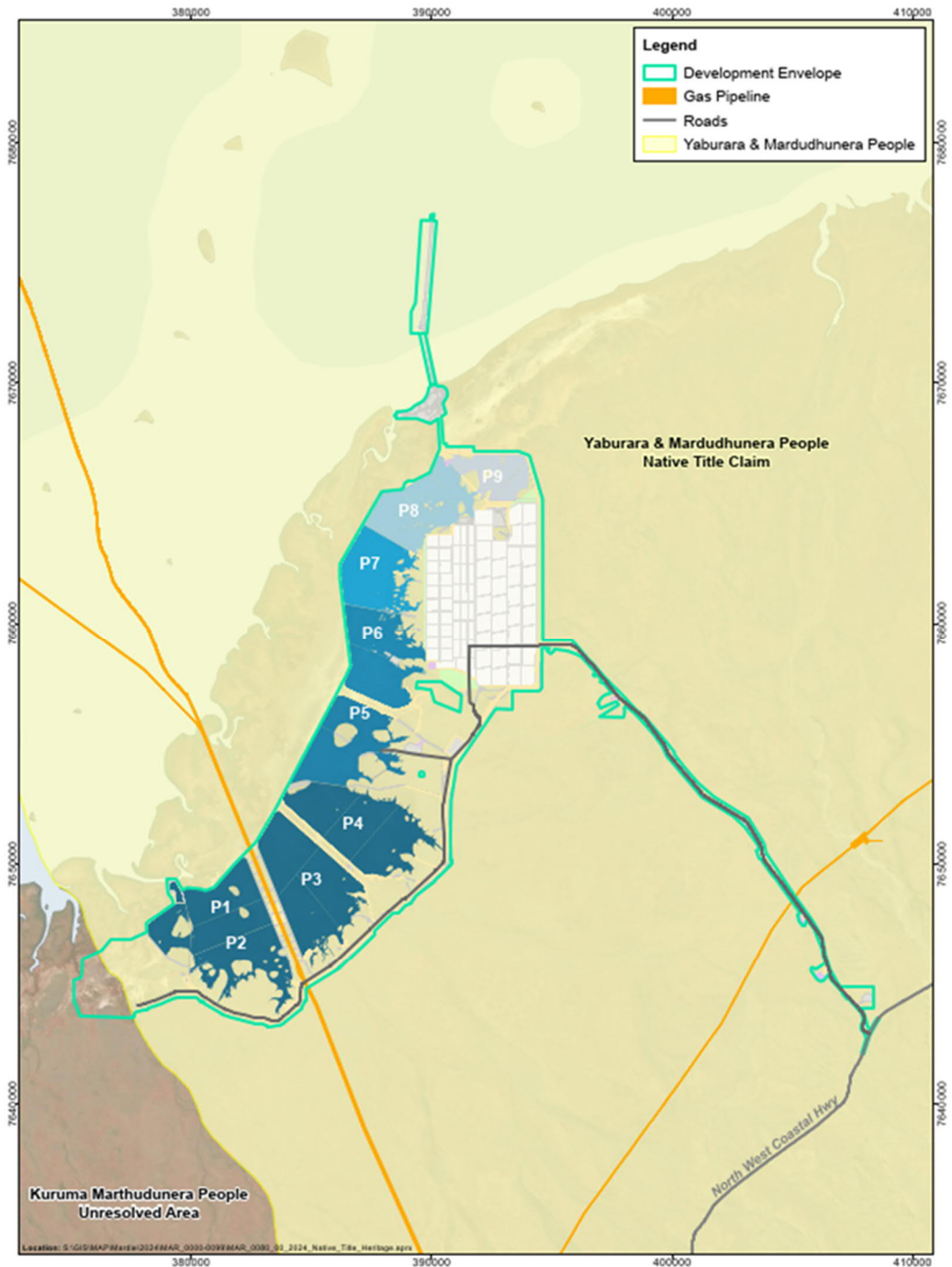
As shown in Figure 2, this Plan covers Project areas within the Yaburara & Mardudhunera Native Title determination area. A very small portion in the southwest of the Project has no current native title claim or determination; however, BCI recognise the enduring connection the RRK People have to this area and formally recognise this, including their rights and obligation to speak for cultural heritage in this area.

As a party to the agreements made with the Traditional Owner groups, BCI will be responsible for facilitating implementation of the agreement requirements within the Project and will ensure all project contractors and personnel also abide by the agreement requirements.

This Plan has been developed based on the findings of Aboriginal heritage surveys including archaeological and ethnographic assessments and consultation with Aboriginal stakeholder groups.

This Plan is an evolving document and will continue to be updated as more information becomes available about the places, sites and cultural heritage aspects, of the Project area, and further consultation, assessment and salvage is undertaken with the Aboriginal stakeholder groups. It will also be reviewed in conjunction with Traditional Owner groups upon significant legislative or policy change in line with community expectations and standards.

Figure 2: Native Title Determination Boundaries



### 3. COMPANY COMMITMENTS AND OBLIGATIONS

#### 3.1 Traditional Owner groups

The Project area affects land in which the YM People have Native Title Determination (WAD127/1997). The YM People and RRK People have shared rights in relation to historical overlap of areas which cover the Project. BCI formally recognise the RRK People's enduring connection to the area and to the Unresolved Area to the south, identified in Figure 2.

As part of the YM determination, both YM People and RRK People are responsible for protection of country and cultural heritage and have agreed processes for how Traditional Owners manage heritage. BCI understand these processes are to be followed by WAC in managing heritage.

#### 3.2 Land Access Deeds

BCI has entered into a LAD with the YM People (executed November 2012) and another LAD with the RRK People (executed October 2012). A framework for consultation with Traditional Owners is set out in these Deeds along with key obligations for all parties on a range of matters including the management of impacts of the Project on Aboriginal heritage.

In addition to the original LAD, BCI holds a Supplement Deed with RRKAC (executed October 2022), acknowledging that the RRK People continue to assert the Unresolved Area is part of their traditional country in relation to which they continue to hold and exercise native title rights and interests. Under this deed, BCI agreed to comply with the existing protocols outlined in the RRK 2012 LAD, to Mardie Operations that fall within the Unresolved Area.

As part of BCI's agreement with Traditional Owner groups, BCI has committed to:

- Maintain timely, open and flexible communication with the Aboriginal stakeholder groups.
- Consult with the Traditional Owner groups in relation to the management of Aboriginal heritage in their respective areas throughout the life of the project in the agreed manner, including but not limited to:
  - Consultation methods such as a minimum of two Implementation Committee meetings per year, and
  - Continued access to country for traditional laws and customs.
- Endeavour to avoid identified Aboriginal sites where possible, however, should this prove not possible, a section 18 under the Aboriginal Heritage Act (1972) will be applied for.
- Fulfil its statutory obligations under the Aboriginal Heritage Act (1972) and exceeding its statutory obligations in terms of best practice heritage management

#### 3.3 Legislation

The following legislation may apply in relation to the impact of the Project on Aboriginal Heritage:

- Aboriginal Heritage Act 1972 (WA) (AHA)
- Aboriginal Heritage Regulations 1974 (WA)
- Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)
- Criminal Code Compilation Act 1913 (WA)
- Coroners Act 1996 (WA)
- Native Title Act 1993 (Cth)

## 4. PROJECT PERSONNEL RESPONSIBILITY

### 4.1 Compliance with BCI Systems

BCI subsidiaries and Project Personnel agree to abide by and use BCI policies, systems and procedures. All discussion in this Plan referring to systems, data recording, reporting, analysis, document filing, records management, etc. refers to the use of BCI's intranet/internet-based information management system "INX – InForm".

Although Contractors must have their own management plans and systems, all recorded data, hazards/risks observations, assessments, reports, investigations, findings, etc. relating to Project work is entered into INX – InForm to ensure compliance with BCI policies, systems and procedures.

Project Personnel must comply with this Plan along with:

- Incident Reporting and Management Procedure BCI-WHS-PR-009 Rev 0 (Appendix A)
- Cultural Heritage Policy (Appendix B)
- Ground Disturbance and Topsoil Stockpiling Work Instruction BCI-ENV-PRO-001 (Appendix C)
- Demarcation and Survey Procedure WIN-0000-CI-PRO-001 (Appendix D)
- Aboriginal Heritage Management Guidelines for Contractors MAR-PRJ-CPR-005 (Appendix E)

This will ensure Aboriginal heritage obligations applicable to the Project are upheld and respected.

### 4.2 Roles and Responsibilities

The Contractor shall describe the roles and responsibilities of its key Project Personnel who will manage compliance under this Plan.

### 4.3 Induction and Cultural Awareness Training

Before commencing work on site, all Project Personnel must undergo a formalised and mandatory site induction, which includes specific information regarding the Aboriginal heritage values within the Project area and the obligations of all personnel under the AHA. Any Project Personnel conducting work on site for a period over three weeks during the construction and operation phase will be required to complete cultural awareness training within six months of commencing site work.

The purpose of these inductions and training is to increase awareness of Aboriginal culture, and to demonstrate the cultural differences that may arise between a person's own culture and Aboriginal culture and formulate strategies to accommodate these differences. The cross-cultural training program will be developed and delivered in consultation with the Traditional Owner groups

### 4.4 Communication

Project Personnel will continuously communicate with employees to facilitate effective implementation of this Plan, including toolbox and prestart meetings held regularly by each construction crew which will contain appropriate heritage issues based on heritage consideration associated with the proposed activities.

For example, heritage topics may include:

- New heritage management procedures or information.
- Heritage works occurring on site



- Avoidance of sites as communicated in Ground Disturbance Permits.
- Hazard Assessments including consideration of potential heritage impacts.
- Briefing on heritage incidents that have occurred, including actions taken.
- Addressing questions and concerns raised by personnel.
- Reiteration of heritage management information.

## 5. ABORIGINAL HERITAGE SITE / PLACE

### 5.1 Definition

The definition of what constitutes an Aboriginal site as defined by Section 5 of the AHA and is as follows:

- a) Any place of importance and significance where persons of Aboriginal descent have, or appear to have, left any object, natural or artificial, used for, or made or adapted for use for, any purpose connected with the traditional cultural life of the Aboriginal people, past or present.
- b) Any sacred, ritual or ceremonial site, which is of importance and special significance to persons of Aboriginal descent.
- c) Any place which, in the opinion of the Committee, is or was associated with the Aboriginal people and which is of historical, anthropological, archaeological or ethnographical interest and should be preserved because of its importance and significance to the cultural heritage of the State.
- d) Any place where objects to which this Act applies are traditionally stored, or to which, under the provisions of this Act, such objects have been taken or removed.

BCI also recognises Aboriginal people take a broader approach to heritage and cultural values. BCI recognises Aboriginal people have different views on their own definition of a cultural heritage site and this perspective sees Aboriginal cultural heritage sites inextricably linked with the environment and the health of country. Aboriginal people see their sites in relation to one another, linked across the landscape, rather than individually.

### 5.2 Types

A diverse range of places can comprise Aboriginal heritage sites, however, they fall into two basic but overlapping categories: archaeological and ethnographic sites. The following terminology of Aboriginal sites has been taken from the DAA website (2010). BCI recognises Aboriginal people view archaeological and ethnographic sites differently and such sites may not fall neatly or at all into the following descriptors.

- Archaeological sites: Places where cultural material remains are associated with past Aboriginal land use. These may include:
  - Structure: This is a generic label used to describe a range of archaeological features including those interpreted as lizard 'habitats', hunting blinds and stone arrangements.
  - Fish traps: Often stone structures constructed in tidal ocean, river and estuary environments and inland drainage features.
  - Modified Trees: These are trees that show evidence of having been carved or scarred for the purpose of creating territorial markers, the extraction of raw material for the production of items of material culture (such as bowls or shields).
  - Painting: Aboriginal paintings were undertaken on a wide variety of media, but are best known from rock shelters, caves and overhangs where they are protected from the detrimental effects of the weather. A wide variety of motifs, including anthropomorphic, animal and geometric figures were used; stencilled objects are also common.
  - Engraving: Places where designs are carved, pecked or abraded into a rock surface.

- Grinding patches / grooves: These generally take the form of circular smooth depressions found on rocky exposures and are thought to represent activities relating to the production of 'food'.
  - Quarry: These sites can take several forms. In most cases they comprise surface hardstone exposures, which were exploited as a raw material for the manufacture of stone artefacts. Ochre and other mineral pigments were also exploited, usually being mined from naturally occurring deposits.
  - Artefact Scatters: Stone artefact scatters are the most common archaeological component represented throughout Western Australia. In most cases they comprise a surface scatter of stone artefacts, although a sub-surface component may also be present, particularly in depositional environments such as those found in the coastal and sub-coastal areas. Such deposits are particularly significant in terms of the potential afforded for dating the site and examining change over time.
  - Middens: Such sites consist of scatters of humanly deposited shell, usually with a stratified component.
- Ethnographic sites: Places of spiritual importance to Aboriginal people (for religious or other reasons). Such places may have no distinguishing characteristics to alert non-Aboriginal people to their existence. These may include:
    - Ceremonial: These are places that have been used for ceremonial purposes. Although such sites can sometimes be identified by the presence of stone arrangements or modelling of the ground surface, many can only be located through consultation with people who have either direct or indirect knowledge of such sites.
    - Mythological: These sites generally encompass some natural feature, such as a hill or waterway, which is considered significant to contemporary Aboriginal people.
    - Burials: These are generally difficult to identify unless explicitly distinguished by some sort of marker, are known to family and / or community members, or have been recorded in a documentary or oral format.

## 6. CONSULTATION AND FIELDWORKS

Table 2 lists the more significant events and timeline of the consultation process between BCI and the YM People and RRK People to date. Consultation is ongoing and as the project evolves, additional events will be added to Table 2.

Table 2: Summary of Consultations and Fieldworks

GROUP	DATE OF CONSULTATION	CONSULTATION DETAILS
YM People	August 2017	Mardie Project Briefing
RRK People	September 2017	Mardie Project Briefing
YM People	September 2017	Heritage Constraints Assessment
RRK People	September 2018	Heritage Survey
YM People	December 2018	Work Program Clearance
YM People	March 2019	Land Access Deed Negotiations
RRK People	May 2019	Aboriginal Archaeological Work Area Clearance survey

GROUP	DATE OF CONSULTATION	CONSULTATION DETAILS
YM People	July 2019	Salt Royalties Negotiations
YM People	July 2019	Section 18 Consultation Meeting
YM People	August 2019	Salvage and Relocation
YM People	August 2019	Work Program Clearance
YM People	September 2019	Salt Royalties Negotiations
RRK People	July 2020	Archaeological and Ethnographic Site Avoidance survey
YM People	July 2020	Aboriginal Heritage Survey
YM People	September 2020	Aboriginal Heritage Survey
YM People	September 2020	Section 18 Consultation Meeting
RRK People	October 2020	Section 18 Consultation Meeting
YM People	November 2020	WAC Port Negotiations
RRK People	December 2020	Implementation Committee Meeting
YM People	January 2021	WAC Board Meeting
YM People	January 2021	Site Avoidance Aboriginal Heritage Survey
YM People	February 2021	Aboriginal Heritage Survey
YM People	March 2021	Aboriginal Heritage Survey
RRK People	March 2021	Mardie Project Due Diligence Meeting
YM People	March 2021	WAC Port Consultation
YM People	March 2021	WAC Environmental Footprint Consultation
YM People	April 2021	WAC Port Negotiations
YM People	May 2021	Aboriginal Heritage Survey
YM People	June 2021	WAC Members Consultation
RRK People	September 2021	Section 18 Reaffirmation Meeting
RRK People	October 2021	Implementation Committee Meeting
RRK People	November 2021	Archaeologist Survey
RRK People	November 2021	Supplementary Agreement   Accession Deed Discussion
YM People	November 2021	WAC Community Meeting Port ILUA and Restated LAD Consultation
RRK People	November 2021	Ethnographic Survey
RRK People	December 2021	Cultural Heritage Management Plan Consultation
YM People	December 2021	Cultural Heritage Management Plan Consultation
RRK People	December 2021	Archaeological Salvage
YM People	December 2021	Aboriginal Survey and Salvage
YM People	December 2021	WAC consultation – Mardie Pool groundwater drilling
YM People	December 2021	Cultural Awareness Training video consultation
RRK People	December 2021	Cultural Awareness Training video consultation



GROUP	DATE OF CONSULTATION	CONSULTATION DETAILS
RRK People	January 2022	BCI21-05 Discussion
RRK People	February 2022	BCI21-05 Site Recording
YM People	February 2022	Salvage and Relocation
RRK People	February 2022	Site Recording
YM People	February 2022	Implementation Committee Meeting
RRK People	March 2022	Pre-Implementation Committee Meeting Discussion
RRK People	March 2022	Implementation Committee Meeting
YM People	May 2022	Implementation Committee Meeting
YM People	June 2022	Salvage and Relocation
YM People	July 2022	Survey, Salvage and Relocation
YM People	August 2022	Community Day – Traditional Owner site visit
YM People	September 2022	Implementation Committee Meeting
YM People	September 2022	Salvage and Relocation
YM People	October 2022	Cultural Monitoring
YM People	November 2022	Cultural Monitoring – disturbance of sites 10351 and 10536
YM People	November 2022	Water Monitoring Survey
YM People	December 2022	Environmental Monitoring
RRK People	December 2022	Implementation Committee Meeting
YM People	January 2023	Implementation Committee Meeting
YM People	February 2023	Environmental Monitoring
YM People	March 2023	Cultural Monitoring
YM People	March 2023	Environmental Monitoring
YM People	April 2023	Cultural Monitoring
YM People	May 2023	Cultural Monitoring
YM People	May 2023	Implementation Committee Meeting
YM People	June 2023	Cultural Monitoring
YM People	August 2023	Cultural Monitoring
YM People	August 2023	Implementation Committee Meeting
RRK People	September 2023	Environmental Survey
YM People	September 2023	Environmental Survey
YM People	September 2023	Cultural Awareness Training
YM People	September 2023	Cultural Monitoring
YM People	October 2023	Cultural Monitoring
YM People	November 2023	Environmental Survey – Feral Fauna
YM People	November 2023	Environmental Survey – Algal Mat

GROUP	DATE OF CONSULTATION	CONSULTATION DETAILS
YM People	December 2023	Cultural Monitoring
YM People	December 2023	Environmental Survey – Turtle
YM People	January 2024	Environmental Survey - Shorebird
YM People	February 2024	Environmental Survey – Turtle
YM People	February 2024	Salvage and Relocation
YM People	March 2024	Cultural Monitoring - Clearing
YM People	April 2024	Salvage and Relocation
YM People	May 2024	Health, Safety, Environment and Community (HSEC) Forum
YM People	May 2024	Heritage Survey – Mardie Airstrip
YM People	May 2024	Cultural Monitoring – Clearing
YM People	June 2024	Environmental Survey – Algal mats
YM people	June 2024	Environmental Survey – Mangroves
YM People	June 2024	Environmental Survey – Minuria Tridens
YM People	July 2024	Cultural Monitoring - Clearing

## 7. HERITAGE SURVEYS

### 7.1 Framework

BCI entered a LAD with the YM People (restituted and executed in December 2021) and the RRK People (executed October 2012) which sets out key obligations on a range of matters including the management of impacts of the Project on Aboriginal heritage.

BCI also acknowledges that the YM People and RRK People have an intra-indigenous agreement, known as the KM YM ILUA which governs how heritage is addressed between the YM People and RRK People over much of the Mardie Project Area.

BCI must issue a written notice setting out the nature and location prior to conducting any Low Impact Project Operations. WAC or RRKAC as appropriate have 10 business days to advise whether the works will impact on any Aboriginal sites.

Prior to conducting any Ground Disturbing Project Operations, BCI must provide written notice to the WAC or RRKAC as appropriate setting out the works proposed to be undertaken and provide a statement of whether a heritage survey is required in the area. Where a heritage survey is required, BCI must provide a methodology and the date BCI proposes the heritage survey commences. WAC or RRKAC as appropriate are required to provide a list of up to six Aboriginal Consultants and heritage professionals, a date and estimate of reasonable fees and expenses within ten business days. BCI acknowledge WAC must comply with the KM & YM ILUA when establishing survey teams.

Should the Traditional Owners disagree with a statement in the written notice that a heritage survey is required they must, within ten business days, give BCI written notice setting out the reason.

BCI commits to adhering to the conclusions, recommendations and conditions contained in heritage survey reports.

## 7.2 Summary of Heritage Survey Reports

The following Tables list the timeline and report titles for the formal heritage surveys carried out to date; Table 3 lists the summary of final heritage survey reports for the YM People and, Table 4 lists the summary of final heritage survey reports for the RRK People. If additional formal heritage surveys are carried out, this plan and Tables 3 and 4 will be updated accordingly.

Table 3: Summary of Final Heritage Survey Reports – YM Determination Area

DATE	AUTHOR	CONSULANTCY	METHOD	REPORT TITLE
September 2017	Damien Lafrentz	Horizon Heritage Management	Helicopter assessment, landscape review.	Heritage Constraints Assessment for BC Iron Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, September 2017
December 2018	Damien Lafrentz, Philippa Hunter & Nigel Tonkin	Horizon Heritage Management	Ethnographic and Archaeological	Work Program Clearance for the Yaburara & Marthudunera People and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, December 2018
August 2019	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Salvage and Relocation	Salvage and Relocation Report of the Mardie Salt Project Area, South of Karratha, Western Australia, August 2019
August 2019	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Work Program Clearance for the Yaburara & Marthudunera People and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, August 2019
July 2020	Damien Lafrentz & Nigel Tonkin	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, July 2020
September 2020		Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, September 2020

DATE	AUTHOR	CONSULANTCY	METHOD	REPORT TITLE
January 2021	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Site Avoidance Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, January 2021
February 2021	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, February 2021
March 2021	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, March 2021
May 2021	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, May 2021
August 2021	Damien Lafrentz	Horizon Heritage Management	Salvage and Relocation	Wirrawandi Aboriginal Corporation Salvage and Relocation Report of the Mardie Salt Project Area, South of Karratha, Western Australia, August 2021
August 2021	Damien Lafrentz & Aaron Floky	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, July & August 2021
October 2021	Damien Lafrentz & Aaron Floky	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Ltd for the proposed Mardie Salt Project, south of Cape Preston, WA, October 2021
December 2021	Damien Lafrentz	Horizon Heritage Management	Survey and Section 18 Cultural Salvage	Site Avoidance Aboriginal Heritage Survey and Section 18 Cultural Salvage for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, December 2021

DATE	AUTHOR	CONSULANCY	METHOD	REPORT TITLE
February 2022	Carly Sims	Horizon Heritage Management	Survey and Section 18 Cultural Salvage	Site Avoidance Aboriginal Heritage Survey and Section 18 Cultural Salvage for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, February 2022
June 2022	Damien Lafrentz & Aaron Floky	Horizon Heritage Management	Salvage and Relocation	Wirrawandi Aboriginal Corporation Survey and Cultural Salvage Relocation report at the BCI Minerals Mardie Salt Project, south of Karratha, Western Australia, June 2022
September 2022	Damien Lafrentz & Aaron Floky	Horizon Heritage Management	Salvage and Relocation	Wirrawandi Aboriginal Corporation Cultural Salvage Relocation report at the BCI Minerals Mardie Salt Project, south of Karratha, Western Australia, September 2022
April 2024	Damien Lafrentz and Rhys Lucey	Horizon Heritage Management	Salvage and Relocation	Wirrawandi Aboriginal Corporation Cultural Salvage Relocation report for DPLH 38637 Mardie Salt 02 at the BCI Minerals Mardie Salt Project, south of Karratha, Western Australia, April 2024.
May 2024	Damien Lafrentz	Horizon Heritage Management	Heritage Survey	Site avoidance Aboriginal Heritage Survey for Wirrawandi Aboriginal Corporation and BCI Minerals Limited for Miscellaneous Licence L08/325 at the Mardie Salt & Potash Project, south of Cape Preston.

Table 4: Summary of Final Heritage Survey Reports – RRK Area

DATE	AUTHOR	CONSULTANCY	METHOD	REPORT TITLE
May 2019	Wendy Ryan	Gavin Jackson Cultural Resource Management	Archaeological	A Report of the Aboriginal Archaeological Work Area Clearance survey within the BCI Mardie Salt and Potash Project Area, Pilbara, Western Australia
June 2019	Edward M. McDonald	Ethnoscience	Ethnographic	Report on an Ethnographic Site Avoidance Survey of BCI's Mardie Salt & Potash Pilbara, Western Australia
July 2020	John Cecchi	JCHMC	Archaeological and Ethnographic	Report of an Archaeological and Ethnographic Site Avoidance Survey of BCI Minerals Limited Mardie Project
November 2021	Ryan Hovingh	Snappy Gum Heritage Services	Salvage of Isolated Finds	Preliminary Advice of the Salvage of Isolated Finds within BCI Minerals Limited's Mardie Salt Project, southwest of Karratha – November 2021
November 2021	Olivia Norris – Robin Stevens	Stevens Heritage Services	Ethnographic Site Identification Heritage Survey	Report of a Kuruma and Marthudunera Ethnographic Site Identification Heritage Survey at BCI Minerals Pty Ltd's Mardie Salt and Potash Project in the West Pilbara Region of Western Australia
November 2021	Ryan Hovingh	Snappy Gum Heritage Services	Archaeological Survey	Preliminary Advice of the Work Program Clearance Archaeological Survey within the BCI Minerals Limited Mardie Salt Project, southwest of Karratha – November 2021
September 2022	Ryan Hovingh	Snappy Gum Heritage Services	Archaeological Survey, Site Recording and Salvage	Report on the Archaeological Survey, Site Recording and Salvage within the BCI Minerals Limited Mardie Salt Project, southwest of Karratha – November 2021 – March 2022.

## 8. SUMMARY OF SECTION 18 NOTICES AND CONSENTS

Table 5 lists the Section 18 notices and consents that apply to works within the Project.

Table 5: Section 18 Notices and Consents

REFERENCE NUMBER	NOTICE DETAILS	CONSENT DATE	CONSENT DETAILS	RELEVANT CONDITIONS OF CONSENT
S18-69-17160	<p>ID 11409 (Mardie Station A) ID 11410 (Mardie Station B)</p> <p>*June 2021 update – 11409 and 11410 removed from the Register of Aboriginal Heritage Places and Objects</p> <p>ID 17833 (Tap Site 2 – not a site, rather a place)</p> <p>ID 22932 (Hadson 2 – not a site, rather a place)</p> <p>ID 22933 (Hadson Midden 1)</p>	22-Jan-20	<p>For the development, operation, maintenance and decommissioning of the Mardie salt and potash project including: feasibility investigations including establishing access tracks, conducting site trials, clearing/construction of access tracks/roads to support project construction and operation, construction of pump stations, solar evaporation ponds, crystalliser ponds and processing plants, construction of supporting infrastructure including but not limited to accommodation village, administration facilities, laboratory, electrical power generation and distribution, waste water treatment plant, waste facilities, communication facilities and maintenance workshops and operation and maintenance of the above and decommissioning and rehabilitation of the above</p>	<p>Provide in writing, the opportunity for Y&amp;M representatives to conduct salvage of Aboriginal sites ID 11409 (Mardie Station A) and ID 11410 (Mardie Station B).</p>

REFERENCE NUMBER	NOTICE DETAILS	CONSENT DATE	CONSENT DETAILS	RELEVANT CONDITIONS OF CONSENT
MIN-2020-1715	<p>10351 (Wiruwandi Plain)</p> <p>10536 (Gas Pipeline 39)</p> <p>10537 (Gas Pipeline 40)</p> <p>* 38619 (Mardie Salt Thalu 01 – removed from application, not to be disturbed)</p> <p>38638 (Mardie Salt 01 – not a site, rather a place)</p> <p>38637 (Mardie Salt 02 – not a site, rather a place)</p>	10-Feb-22	<p>For the development, operation, maintenance and decommissioning of the Mardie salt and potash project including: clearing/construction and upgrade of Mardie Road; minor grading / reshaping of the road to improve safety, installation of fencing along the road; installation of cattle grids along the road, increase road width to 10m (1 lane each way), improve road surface (remains unsealed), maintain current rout of road, some corners may be slightly modified in order to achieve design speed compliance, new material for the road will be sourced from borrow areas along the road alignment, construction water for road upgrade will be sourced from bores (to be sunk still) along the road; construction of crystalliser ponds; construction of gas pipeline; operation and maintenance of the above; and decommissioning and rehabilitation of the above.</p>	<p>Invites, in writing, two Y&amp;M representatives to be present for ground disturbing works on the Land where it intersects Aboriginal sites ID 10351 (Wiruwandi Plain), ID 10536 (Gas Pipeline 39) and ID 10537 (Gas Pipeline 40).</p> <p>Invites, in writing, Y&amp;M representatives to undertake an agreed method of cultural salvaging of Aboriginal sites ID 10351 (Wiruwandi Plain), ID 10536 (Gas Pipeline 39) and ID 10537 (Gas Pipeline 40), which are to be relocated to a nominated location for safe keeping.</p>



REFERENCE NUMBER	NOTICE DETAILS	CONSENT DATE	CONSENT DETAILS	RELEVANT CONDITIONS OF CONSENT
MIN-2020-1714	17429 (Nyungarrarra (Peters Creek))	28-Jan-22	For the development, operation, maintenance and decommissioning of the Mardie Salt and Potash Project including: construction of a pond wall (4.2m high and 3-4m in width) for the purpose of holding sea water; construction of the pond wall will result in diversion of water flows from Peters Creek to the southern boundary of pond 1 towards the coast; operation and maintenance of the pond wall and decommissioning and rehabilitation, post mine closure.	Invites, in writing two RRK (formerly K&M) representatives to be present for ground disturbing works on the Land where it intersects with the boundary of Aboriginal site ID 117429 (Nyungarrarra (Peters Creek)).

## 9. SUMMARY OF HERITAGE FINDS

Table 6 (RRK) and Table 7 (YM) summarise the heritage finds within the Project to date.

Table 6: Summary of Heritage Finds – RRK Area

RRK People		
Category	Identified	Subject to s18 consent
Artefact scatter / Quarries	30 locations, multiple artefacts	-
Engravings	-	-
Grinding Base	13	-
Ethnographic Place	-	-
Shell scatter	16	-
Water Source	-	-
Mythological	4	1

Table 7: Summary of Heritage Finds – YM Determination Area

YM People		
Category	Identified	Subject to s18 consent
Artefact Scatter / Quarries	114	2
Engravings	0	0
Grinding Base	13	2
Ethnographic Place	1	0
Shell scatter	16	0
Water Source	9	0
Mythological	4	2

## 10. MEASURES TO PROTECT ABORIGINAL HERITAGE

### 10.1 Key Hazards

Construction will involve ground disturbing activities and other general access requirements, which will change from time to time as the construction programme evolves. Table 8 lists the generic key hazards expected during construction, and the mitigating strategies to be put in place. Project Personnel will be required to abide by all GDP conditions (refer section 10.3), to ensure these key hazards are managed appropriately and to avoid any potential impacts.

Table 8: Key Hazards to Aboriginal Heritage During Construction

KEY HAZARDS	MITIGATION STRATEGIES
Vehicle / machinery activity	<ul style="list-style-type: none"> <li>• Vehicle and machinery movements limited to areas that have been subject to heritage clearance.</li> <li>• Issuing of ground disturbing permits which clearly delineate approved areas for ground disturbance and outline heritage restrictions.</li> <li>• Demarcation of heritage places and sites as required, to avoid indirect disturbance.</li> <li>• Salvage of materials where requested by the Traditional Owner groups.</li> </ul>
Vegetation clearing	<ul style="list-style-type: none"> <li>• Vegetation clearing limited to areas that have heritage clearance.</li> <li>• Issuing of ground disturbing permits which clearly delineate approved areas for ground disturbance and outline heritage restrictions.</li> <li>• Demarcation of heritage places and sites as required, to avoid indirect disturbance.</li> <li>• Salvage of materials where requested by the Traditional Owner groups.</li> </ul>
Earthworks	<ul style="list-style-type: none"> <li>• Earthworks limited to areas that have been subject to heritage clearance.</li> <li>• Issuing of ground disturbing permits which clearly delineate approved areas for ground disturbance and outline heritage restrictions.</li> <li>• Demarcation of heritage places and sites as required to avoid indirect disturbance.</li> <li>• Salvage of materials where requested by the Traditional Owner groups.</li> </ul>
Maintenance and construction activities	<ul style="list-style-type: none"> <li>• Construction activities limited to areas that have been subject to heritage clearance.</li> <li>• Issuing of ground disturbing permits which clearly delineate approved areas for ground disturbance and outline heritage restrictions.</li> <li>• Aboriginal monitors to be engaged in highly sensitive areas.</li> <li>• Demarcation of heritage places and sites as required to avoid indirect disturbance.</li> <li>• Salvage of materials where requested by the Traditional Owner groups.</li> </ul>

KEY HAZARDS	MITIGATION STRATEGIES
Direct human contact	<ul style="list-style-type: none"> <li>• Demarcation of heritage places and sites as required, to avoid indirect disturbance.</li> <li>• All BCI personnel and contractors will attend compulsory inductions prior to commencing site work and will undergo training in relation to cultural heritage obligations under this Plan.</li> <li>• Any personnel conducting work for over one month will also be required to participate in cultural awareness training to improve their understanding of cultural heritage values within the area.</li> <li>• All BCI personnel adhering to walk and driving tracks.</li> <li>• Site specific rules to restrict site personnel from accessing specified places.</li> </ul>
Generation of dust and vibration (operation of heavy machinery / blasting)	<ul style="list-style-type: none"> <li>• Ongoing monitoring of dust and vibration levels and inspection of heritage places in proximity.</li> </ul>
Changes in hydrology	<ul style="list-style-type: none"> <li>• Ongoing monitoring of water levels.</li> </ul>

## 10.2 Heritage Sites Impacts and Management Strategies

Table 9 lists the heritage sites (by specific ID number) for the Project. The table includes all identified cultural material including previously identified DPLH sites and newly recorded places, along with the expected extent of impact by the Project and the proposed mitigating strategies. BCI also recognises sites of significance to the YM People and RRK People which are included in Table 12. As discussed in Section 10.1 above, the Heritage Team will work with Project Personnel to assess the potential impact to the listed heritage sites for their workplaces, and which will result in workplace specific mitigating actions.

Figure 3 Section 18 status and Figure 4 Heritage status are detailed maps of the Project area. These maps are included to provide a visual representation of the heritage sites and places identified within the Project area.

Table 9: Heritage Sites Impacts and Management Strategies

Heritage place ID	Site Status	Type	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
17429	Registered	Mythological, Named Place	Peter's Creek – Peters Creek was recorded in 1994 by McDonald, Hales and Associates during a survey of the northern section of the Goldfields Gas Transmission Project. The Peters Creek site has a Mardudhunera name which is Nyungarrarra (meaning 'blue sky').	No impact.	Section 18 MIN-2020-1714 – not yet disturbed.  Demarcation and avoidance.
10536	Registered	Artefact/Scatter	The site was recorded by archaeologist Nigel Tonkin and anthropologist Damien Lafrentz in co-operation with YM Traditional Owners in July 2020 DPLH 10536 Gas Pipeline 39 consists of sparse grinding material including mullers, grind stones and hammer stones. A low density artefact scatter is also present	Partial impact – Mardie Road intersects site The Land will be impacted by the construction/clearance and upgrade of the existing Mardie Road and gas pipeline. A salvage program will be arranged prior to disturbance.	Section 18 MIN-2020-1715 Cultural salvage and relocation complete Not yet disturbed
10537	Registered	Artefact/Scatter	The site was recorded by archaeologist Nigel Tonkin and anthropologist Damien Lafrentz in co-operation with YM Traditional Owners in July 2020 DPLH 10537 Gas Pipeline 40 consists of sparse grinding material including mullers, grind stones and hammer stones. A low density artefact scatter is also present	Partial impact – Mardie Road intersects site The Land will be impacted by the construction/clearance and upgrade of the existing Mardie Road and gas pipeline. A salvage program will be arranged prior to disturbance.	Section 18 MIN-2020-1715 Cultural salvage and relocation complete Not yet disturbed

Heritage place ID	Site Status	Type	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
10351	Registered	Mythological	Wiruwandi Plain – This registered mythological site was recorded by Dr Palmer in 1975 and later by Brown in 1979. It extends from Wearawandie Well in the south to Mardie Wool Shed in the north and west of the Mardie-North West Costal Highway Road. It forms part of the Wiruwandi (Boomerang Wood) Dreaming which also includes a hill and a pool. The Plain is located adjacent to the Mardie Salt Project. This site has significance to the YM Aboriginal people as a mythological dreaming story site	Partial impact – Mardie Road intersects site The Land will be impacted by the construction/clearance and upgrade of the existing Mardie Road and gas pipeline.	Section 18 MIN-2020-1715 Disturbance partially complete
38618	Registered	Artefacts/Scatter	Mardie Salt 04 – Artefacts/Scatter	No impact	Demarcation and site avoidance
38619	Registered	Ceremonial, Mythological	Maride Salt Thalu 01 – The site was recorded by archaeologist Nigel Tonkin and anthropologist Damien Lafrentz in co-operation with YM Traditional Owners in July 2020  Mardie Salt Thalu 01 is a Thalu weather site used to increase rain and thunder to help maintain country. It is a naturally occurring iron stone outcropping with the main focus being a large boulder at 397738E 7656806N close to the existing Mardie Road	No impact	Demarcation and site avoidance

Heritage place ID	Site Status	Type	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
6322	Registered	Artefacts/Scatter, Ceremonial, Grinding Patches/Grooves, Midden/Scatter, Skeletal Material/Burial, Camp	Mardie Creek Burial – The burial (human cranium/skull) is located further west from Mardie Pool closer to the coastal tidal zone on a sand ridge covered with spinifex scrub. A low density artefact and shell scatter is noted around the burial area. An extremely large (approx. 500 m x 100 m) high density artefact and shell scatter (Saccostrea spp. Terebralia spp. Anadara spp. And Melo spp.) site numbered in the thousands is found between the burial and Mardie Pool along the northern bank of the Mardie Creek	No impact	Site exclusion zone
17833	Other Heritage Place	Artefact/Scatter, Shell	Tap Site 2 – Recorded by Lantzke in 1999 during an archaeological survey of the Mardie Gasfield Exploration Programme. The site consists of a small scatter of shells and flaked stone artefacts made from chert, dolerite and basalt. It is located on the shore of a salt flat island at 378938E 7646377N	Fully disturb	Cultural salvage and relocation completed Disturbance completed

Heritage place ID	Site Status	Type	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
26578	Other Heritage Place	Artefacts/Scatter, Historical, Midden/Scatter, Mythological, Named Place, Natural Feature, Plant Resource, Water Source	Wirawundi Pool – Recorded in 2009 by AIC anthropologist Alex Lyneham and Mardudhunera Elder Dorrie Wally. Wirawundi is the Mardudhunera name for Mardie. This pool was utilised by Mardudhunera people for water, food and recreation (swimming). It holds great value to many generations of Mardudhunera people and those that worked on the station. There is a creation story (Boomerang) and women's birthing associated with the pool.	No impact	Site exclusion zone
22932	Other Heritage Place	Artefacts/Scatter	Hadson 2 – Recorded in 1990 by Murphy and McDonald in conjunction with representatives from the Mardudhunera group. This artefact scatter consists of flaked stone artefacts and shell fragments (Melo spp. Anadara spp.) on a sand plain in a coastal flat. It is located at 378280E 7647309N.	Fully disturb	The reliable coordinates given on the AHIS are incorrect. No cultural material is located at this location
22933	Other Heritage Place	Artefacts/Scatter, Midden/Scatter	Hadson Midden 1 – Recorded in 1990 by Murphy and McDonald in conjunction with representatives from the Mardudhunera group. This artefact scatter and midden consists of flaked stone artefacts and some shells (Saccostrea spp. Terebralia spp. Anadara spp. And Melo spp.) but, because of the presence of coral blocks and mangrove branches, the shell scatter may be natural. It is located at 385280E 7647309N.	Fully disturb	The reliable coordinates given on the AHIS are incorrect. No cultural material is located at this location

Heritage place ID	Site Status	Type	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
22934	Other Heritage Place	Artefacts/Scatter, Midden/Scatter	Hadson Midden 2 – Artefacts/Scatter, Midden/Scatter	No impact	Demarcation and site avoidance
38638	Other Heritage Place	Camp, Artefact Scatter, Shell Scatter & Grinding	Mardie Salt 01 is an artefact scatter and marine resource (shell lens of predominately <i>Anadara granosa</i> ) exploitation area. The site is a sparsely dispersed artefact scatter of approximately 30-50 pieces of knapped stone, several portable grindstones as well as numerous mullers and hammer stones. Mardie Salt 01 appears to be representative of what has been termed (Meehan, 1982) a 'Home Base'. That is a location where men and women (family groups) regularly get together after collection of the gathered molluscs for consumption. As well as the marine resource collection, the knapped and grinding stone(s) indicates that tool manufacture and food processing has taken place.	Fully disturb	Salvage and relocation of salvage material complete



38637	Other Heritage place	Camp, Artefact Scatter, Shell Midden and Grinding	<p>Mardie Salt 02 – The site was recorded in July 2020 by anthropologist Damien Lafrentz and archaeologist Nigel Tonkin in co-operation with YM Traditional Owners. Mardie Salt 02 is an artefact scatter and marine resource (shell lens of predominately Anadara granosa) exploitation area. The site is a low density artefact assemblage consisting of dolerite, basalt and BIF artefacts. Both the cultural material and shell lens appeared to be embedded in a paleo channel that has been heavily silted and has significant Mesquite infestation. Mardie Salt 02 is a sparsely dispersed artefact scatter of approximately 60-120 pieces of knapped stone, portable grindstones as well as numerous mullers and hammer stones. Mardie Salt 01 appears to be representative of what has been termed (Meehan, 1982) a 'Home Base'. That is a location where men and women (family groups) regularly get together after collection of the gathered molluscs for consumption. As well as the marine resource collection, the knapped and grinding stone(s) indicates that tool manufacture and food processing has taken place.</p>	Fully disturb	<p>Salvage and relocation of salvage material.</p> <p>Salvage and relocation complete, April 2024.</p> <p>Disturbance not complete.</p>
-------	----------------------	---------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------	-----------------------------------------------------------------------------------------------------------------------------------------

Heritage place ID	Site Status	Type	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
38594	Other Heritage Place	Artefacts/Scatter, Grinding Patches/Grooves, Camp	<p>Mardie Salt 03 – The site was recorded by archaeologist Nigel Tonkin and anthropologist Damien Lafrentz in co-operation with YM Traditional Owners in July 2020</p> <p>Mardie Salt 03 is an artefact scatter and grinding site. This site is a moderately sized artefact scatter of approximately 10 – 15 pieces of knapped stone artefacts. Most artefacts were made from locally sourced Chert, with lesser numbers of Ironstone and Mudstone. The site appeared to be a short-term transitional habitation site with the artefact distribution predominately in 4 small clusters with a sparse background scatter. Maximum artefact density was approximately 3m<sup>2</sup>. Most notable at the site was the five grindstones and four mullers with one particular grindstone showing signs of extensive use and resurfacing (pitting)</p>	No impact	Demarcation and site avoidance

Figure 3: Mardie Salt Project – Section 18 Status

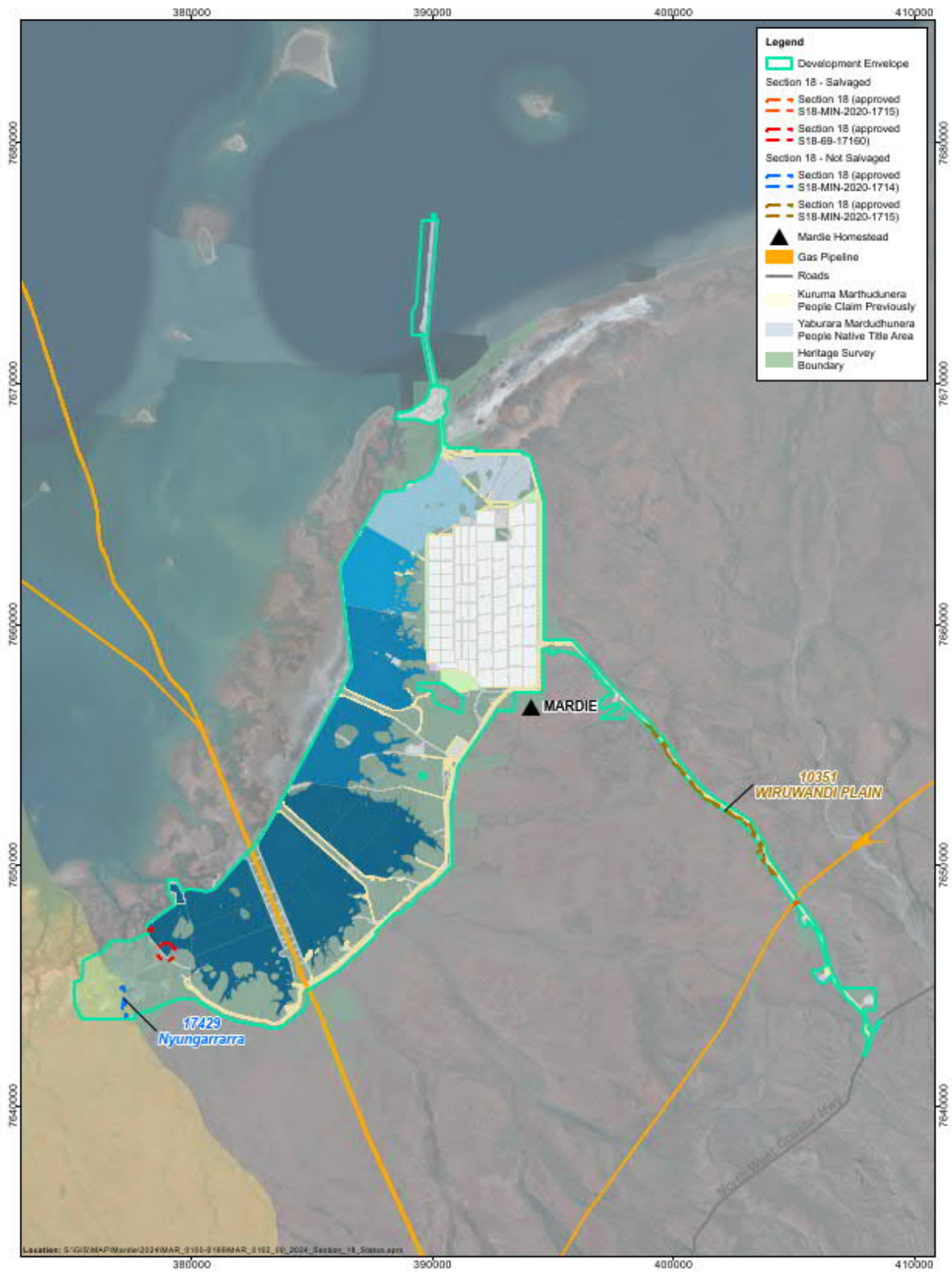
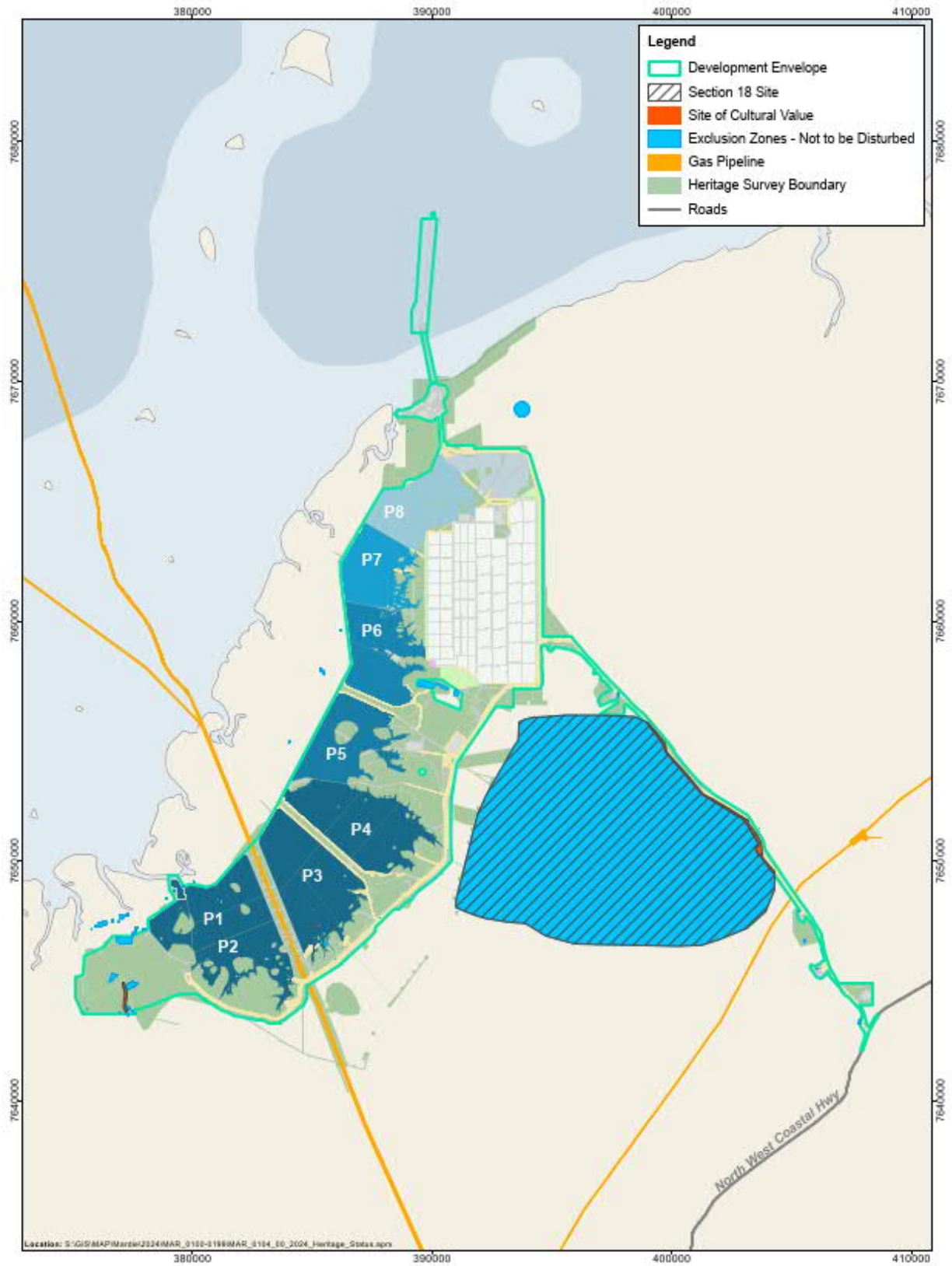


Figure 4: Mardie Salt Project – Heritage Status



### 10.3 Ground Disturbing Activities / Ground Disturbance Permit

Any party undertaking ground disturbing works must request and obtain a GDP from BCI. The Heritage Team will carry out an Aboriginal heritage impact assessment prior to determining any GDP conditions and prior to issuing the approved GDP.

The purpose of the GDP is to ensure BCI provides approval to Project Personnel to disturb land that will not breach obligations under relevant legislation, including the AHA and the other obligations discussed in this Plan.

The GDP will outline the relevant conditions and heritage procedures to be followed for each area of land subject to undertaking the ground disturbing activities.

### 10.4 Aboriginal Monitoring of Ground Disturbing Activities

In some areas of the Project, Aboriginal monitoring may be required during initial ground disturbing activities for highly significant cultural areas or areas not able to be heritage cleared due to dense vegetation. This will be managed as part of BCI's ground disturbance process.

### 10.5 Archaeological Salvage

Archaeological salvage of heritage sites within the Project area may become an agreed mitigation strategy throughout the consultation and approval process for specific heritage places.

This will be managed as part of BCI's ground disturbance process and is subject to obtaining any required approvals. The salvaging process includes recording the cultural material in situ, removing the cultural material within the proposed impact area (pursuant to the terms of a section 18 or with the agreement and cooperation of the relevant Traditional Owner group), relocating the cultural material in accordance with the agreed salvage methodology, either to a designated keeping place or an area outside of the construction footprint and recording the location the cultural material is relocated to.

Materials salvaged to date have been placed in keeping place locations throughout the site:

- Mardie Salt 03 (Mardie Road)
- NS Road Keeping Place
- Mardie Creek Burial Site
- Island 5 (near Peters Creek)
- Mardie Woolshed

All cultural material salvaged from the Project area will be relocated by, and in consultation with, the Traditional Owners. The status of salvaged heritage places is captured in Table 10 for YM and Table 11 for RRK with outstanding salvage in bold text. Relocation details of materials to the preferred keeping place is also documented.

Table 10: Salvage Heritage Places – YM

SALVAGE REPORT DATE	SALVAGE ID	GPS CO-ORDINATES	TYPE / COUNT	RELOCATION AREA
September 2022	Mardie Salt Salvage Pt 1	388745 7662480	Artefacts	Mardie Pool
March 2021	Mardie Salt Salvage Pt 2	394248 7658574	Artefacts	DPLH 6322 Mardie Creek Burial
March 2021	Mardie Salt Salvage Pt 3	394319 7658611	Artefacts	DPLH 6322 Mardie Creek Burial
TBD	Mardie Salt Salvage Pt 4	378248 7645915	34 artefacts	Island 5 near Peters Creek
TBD	Mardie Salt Salvage Pt 5	378405 7646501	18 artefacts	Island 5 near Peters Creek
March 2021	Mardie Salt Salvage Pt 6	385955 7655458	Artefacts	Island 5 near Peters Creek
March 2021	Mardie Salt Salvage Pt 7	394259 7657605	Artefacts	DPLH 6322 Mardie Creek Burial
TBD	Mardie Salt Salvage Pt 8	379383 7647605	7 artefacts	Island 5 near Peters Creek
TBD	Mardie Salt Salvage Pt 9	382403 7647977	7 artefacts	Island 5 near Peters Creek
March 2021	Mardie Salt Salvage Pt 10	394136 7657635	Artefacts	DPLH 6322 Mardie Creek Burial
TBD	Mardie Salt Salvage Pt 11	381560 7648981	51 artefacts	Island 5 near Peters Creek
TBD	Mardie Salt Salvage Pt 12	378859 7645848	32 artefacts	Island 5 near Peters Creek
December 2021	Mardie Salt Salvage Pt 13	378901 7646193	Artefacts	Section 18 Island 5 near Peters Creek
March 2021	Mardie Salt Salvage Pt 14	385967 7655476	Artefacts	Island 5 near Peters Creek
June 2022	Mardie Salt Salvage Pt 15	384135 7653332	Artefacts	North South Road Keeping Place
June 2022	Mardie Salt Salvage Pt 16	384009 7653221	Artefacts	North South Road Keeping Place
June 2022	Mardie Salt Salvage Pt 17	384067 7652889	Artefacts	North South Road Keeping Place
June 2022	Mardie Salt Salvage Pt 18	384832 7653192	Artefacts	North South Road Keeping Place
September 2022	Mardie Salt Salvage Pt 19	387817 7660150	Artefacts	Mardie Pool



SALVAGE REPORT DATE	SALVAGE ID	GPS CO-ORDINATES	TYPE / COUNT	RELOCATION AREA
TBD	Mardie Salt Salvage Pt 20	377784 7645306	45 artefacts	Island 5 near Peters Creek
September 2022	Mardie Salt Salvage Pt 21	387961 7660035	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 22	387913 7661469	Artefacts	Mardie Pool
TBD	Mardie Salt Salvage Pt 23	378693 7646740	14 artefacts	Island 5 near Peters Creek
TBD	Mardie Salt Salvage Pt 26 & 27	388972 7654876 389053 7654796	34 artefacts 2 balor shell fragments	DPLH 6322 Mardie Creek Burial Site
September 2022	Mardie Salt Salvage Pt 28	394103 7660748	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 29	393769 7660528	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 30	393826 7660740	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 31	390491 7655334	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 32	390665 7655507	Artefacts	Mardie Pool
March 2021	Mardie Salt Salvage Pt 33	389662 7655197	Artefacts	DPLH 6322 Mardie Creek Burial Site
March 2021	Mardie Salt Salvage Pt 34	389537 7655002	Artefacts	DPLH 6322 Mardie Creek Burial Site
September 2022	Mardie Salt Salvage Pt 35	390096 7655536	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 36	390216 7655583	Artefacts	Mardie Pool
August 2021	Mardie Salt Salvage Pt 37	406245 7646648	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 38	404992 7648666	Artefacts	Mardie Salt 03
February 2021	Mardie Salt Salvage Pt 39	396734 7658144	Artefacts	DPLH 6322 Mardie Creek Burial Site (temporarily)
September 2022	Mardie Salt Salvage Pt 40	390579 7666643	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 41	391235 7665727	Artefacts	Mardie Pool
August 2021	Mardie Salt Salvage Pt 42	406487 7645795	Artefacts	Mardie Salt 03
September 2022	Mardie Salt Salvage Pt 43	395017 7659864	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 44	394866 7660266	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 45	394559 7660551	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 46	394676 7660371	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 47	394617 7659933	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 48	393522 7657237	Artefacts	Mardie Pool
August 2021	Mardie Salt Salvage Pt 49	406103 7646774	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 50	405835 7646606	Artefacts	Mardie Salt 03

SALVAGE REPORT DATE	SALVAGE ID	GPS CO-ORDINATES	TYPE / COUNT	RELOCATION AREA
August 2021	Mardie Salt Salvage Pt 51	405528 7646800	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 52	405924 7646898	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 53	403697 7650877	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 54	402837 7652007	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 55	402446 7652291	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 56	405731 7646878	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 57	405530 7647119	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 58	405600 7647069	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 59	405569 7647132	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 60	405672 7647298	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 61	405487 7647310	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 62	405732 7647480	Artefacts	Mardie Salt 03
June 2022	Mardie Salt Salvage Pt 63	405600 7647069	Artefacts	North South Road Keeping Place
TBD	Mardie Salt Salvage Pt 64	394028 7662172	Artefacts	TBD
TBD	Mardie Salt Salvage Pt 65	394058 7662054	Artefacts	TBD
TBD	Mardie Salt Salvage Pt 66	394465 7661883	Artefacts	TBD
TBD	Mardie Salt Salvage Pt 67	394448 7661491	Artefacts	TBD
TBD	Mardie Salt Salvage Pt 68	394422 7661536	Artefacts	TBD
TBD	Mardie Salt Salvage Pt 69	394391 7661795	Artefacts	TBD
June 2022	Mardie Salt Salvage Pt 70	389370 7656056	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 71	389889 7656662	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 72	389782 7656643	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 73	392409 7656105	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 74	394274 7657608	Artefacts	Mardie Pool
TBD	Mardie Salt Salvage Pt 75	394397 7657333	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 76	392438 7656189	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 77	392456 7656167	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 78	392513 7656200	Artefacts	
June 2022	Mardie Salt Salvage Pt 79	392249 7656336	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 80	392354 7656153	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 81	392404 7656268	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 82	392257 7656454	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 83	392273 7656477	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 84	394079 7659895	Artefacts	



SALVAGE REPORT DATE	SALVAGE ID	GPS CO-ORDINATES	TYPE / COUNT	RELOCATION AREA
October 2021 June 2022	Mardie Salt Salvage Pt 85	394064 7659997	Artefacts	
September 2022	Mardie Salt Salvage Pt 86	393362 7660428	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 87	392805 7659973	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 88	391893 7659966	Grind Stone	Mardie Pool
September 2022	Mardie Salt Salvage Pt 89	392853 7662120	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 90	393223 7658868	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 91	393410 7658891	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 92	393324 7658689	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 93	393210 7658807	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 94	394475 7661014	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 95	394501 7661046	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 96	394543 7661094	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 97	394230 7660928	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 98	389308 7659463	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 99	389268 7659421	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 100	389326 7659332	Artefacts	Mardie Pool
June 2022	New Port Access Road	391822 7664476	Artefacts	Mardie Pool
September 2022	Mardie Salt 01	389564 7660846	Artefacts	Mardie Pool
April 2024	Mardie Salt 02	391952 7664459	Artefacts	Mardie Woolshed

Table 11: Salvage Heritage Places – RRK

SALVAGE ID	GPS CO-ORDINATES	ARTEFACT COUNT	RELOCATION AREA
Getac 1 – WR:2	375989 7646283	3	Island 5
Getac 1 – WR:4	375753 7645173	1	Island 5
Getac 1 – WR:3	375695 7644474	2	Island 5
Getac 1 – WR:4	375696 7644474	7	Island 5
Getac 1 – WR:5	375696 7644474	1	Island 5
Getac 1 – WR:6	375754 7644494	2	Island 5
Getac 1 – WR:9	376970 7645117	5	Island 5
Getac 1 – WR:12	376804 7645069	2	Island 5
Getac 1 – WR:13	376804 7645069	1	Island 5
Getac 1 – WR:14	376806 7645067	3	Island 5
Getac 1 – WR:15	376801 7645069	Oyster Shell	Island 5
Getac 1 – WR:16	376739 7645061	2	Island 5
Getac 1 – WR:17	376556 7644985	1	Island 5
Getac 1 – WR:1	375999 7646214	2	Island 5
Getac 1 – WR:3	375883 7646069	8	Island 5
Getac 1 – WR:7	376013 7644605	2	Island 5
Getac 1 – WR:8	377008 7645060	5	Island 5
Getac 1 – WR:10	376928 7644975	3	Island 5
Getac 1 – WR:11	376804 7645069	2	Island 5
July 2020 Isolated Artefacts Salvage	44 locations	80 artefacts	Island 5

## 10.6 Demarcation of Heritage Sites

The outer perimeter of any heritage sites or places in the Development Envelope of the Mardie Salt Project/Project will be physically demarcated to avoid any indirect disturbance. Individual demarcation requirements for each site/place are noted in Table 12 and shown in Figure 5.

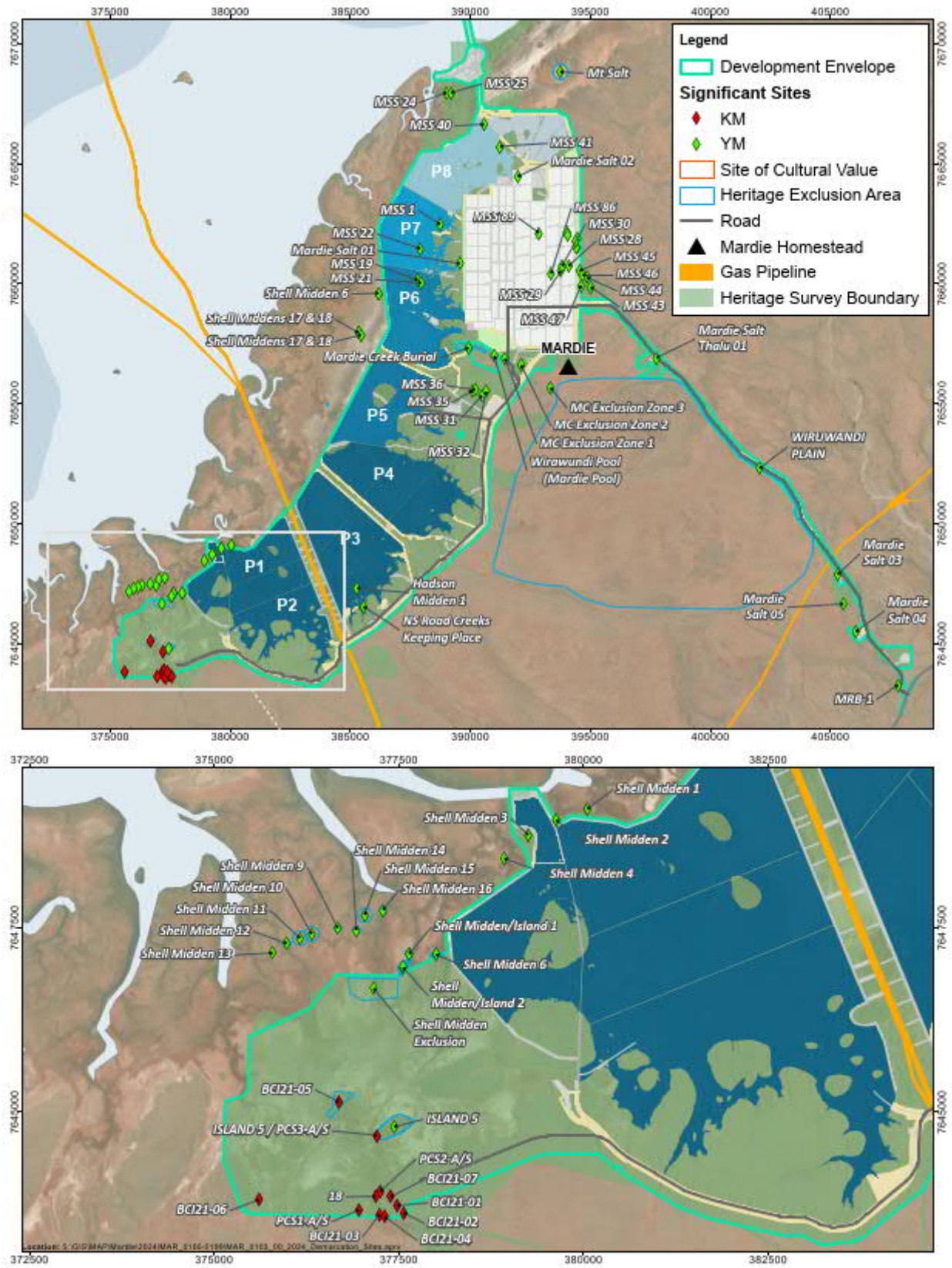
Table 12: Demarcation Sites

SITE ID	GPS CO-ORDINATES	RRK/YM
Peters Creek Scatter 1	376960 7643677	RRK
Peters Creek Scatter 2	377249 7643927	RRK
Peters Creek Scatter 3	377204 7644684	RRK
BCI21-01	377463 7643693	RRK
BCI21-02	377543 7643645	RRK
BCI21-03	377244 7643626	RRK

SITE ID	GPS CO-ORDINATES	RRK/YM
BCI21-04	377329 7643533	RRK
BCI21-05	376749 7645111	RRK
BCI21-06	375632 7643820	RRK
BCI21-07	377366 7643864	RRK
Shell Midden Island 1	377640 7647143	YM
Shell Midden Island 2	377559 7646977	YM
Shell Midden Island 5	377445 7646676	YM
Shell Midden Island 6	378023 7647142	YM
Shell Midden 1	380054 7649111	YM
Shell Midden 2	379642 7648956	YM
Shell Midden 3	379260 7648751	YM
Shell Midden 4	378929 7648435	YM
Shell Midden 6	378023 7647142	YM
Shell Midden 9	376673 7647492	YM
Shell Midden 10	376323 7647413	YM
Shell Midden 11	376163 7647358	YM
Shell Midden 12	375982 7647285	YM
Shell Midden 13	375790 7647156	YM
Shell Midden 14	376926 7647464	YM
Shell Midden 15	377039 7647670	YM
Shell Midden 16	377285 7647739	YM
Shell Midden 17	385432 7657887	YM
Shell Midden 18	385432 7657887	YM
Shell Midden Exclusion	377158 7646676	YM
NS Road Creeks Keeping Place	385561 7646551	YM
Mardie Salt 05	405542 7646658	YM
Mardie Salt Thalu 01	397758 7656913	YM
MC Exclusion Zone 1	391442 7656884	YM
MC Exclusion Zone 2	392123 7656606	YM
MC Exclusion Zone 3	393340 7655661	YM

Demarcation will be in accordance with BCI's Demarcation and Survey Procedure (WIN-0000-CI-PRO-0001).

Figure 5: Demarcation Sites



## 10.7 Aboriginal Heritage Incidents

It is a breach of section 17 of the AHA to disturb or damage an Aboriginal site without prior section 18 Ministerial approval. No ground disturbing work in an Aboriginal heritage site should be conducted without having a GDP issued from BCI and having the appropriate heritage procedures in place.

If inadvertent damage occurs to an Aboriginal heritage site within the Project area, the damaging activity will cease immediately, and the following procedures will be followed:

- Work will cease, the Registered Manager will be contacted, and the area will be cordoned off with surveyor's tape.
- The Registered Manager will contact the Heritage Team to assess the situation to determine the extent of impact and noncompliance.
- The Heritage Team will contact the DPLH and the Traditional Owner group/s' Heritage Managers immediately.
- The incident will be dealt with and reported on according to BCI Incident Management System, using an Incident Notification Form.
- The Heritage Team, along with the Registered Manager, will implement any recommendations or procedures as directed by the DPLH and the Traditional Owner groups.

No work is to be conducted in the area until the investigation is closed-out, and new procedures are in place, if required.

## 10.8 Discovery of Aboriginal Sites (Excluding Human Remains)

Whilst every effort has been undertaken to identify all Aboriginal heritage sites, there may be Aboriginal heritage sites within the project that have not been located either on the surface or subsurface. If cultural material is uncovered or identified, the incident reporting procedure detailed above must be followed along with the following considerations:

- The Heritage Team will contact the Prescribed Body Corporate which will engage Aboriginal monitors or an archaeologist (in its discretion) to assess the material and, among other things, determine whether the material constitutes a site as specified under section 5 of the AHA.
- The archaeologist will conduct the necessary site recording. If the material is determined to constitute a site, the Heritage Team will determine whether there is a section 18 consent in place to disturb heritage sites on that land.
- If the location of the site was subject to a section 18 approval, then the archaeologist along with the Aboriginal monitors will salvage and relocate material in accordance with salvage methodology.
- If the land in which the site is situated is not subject to a section 18 consent, then no work is to be conducted in the area until section 18 consent has been granted by DPLH.
- If the material is not determined to constitute a site under AHA definition, BCI and the Traditional Owner groups will cooperate to determine how to deal with the material.

## 10.9 Discovery of Human Remains

If human remains are uncovered at any stage during the development the incident reporting procedure detailed above must be followed along with the following considerations:

- The Registered Manager will contact the WA Police.



- The Registered Manager will contact the Head of Corporate Affairs and BCIs Heritage Team who will contact the DPLH and the Traditional Owner Group/s' Heritage Manager. Aboriginal monitors and an archaeologist will be invited to site with the police for consultation purposes.
- If the remains are decided to be historical Aboriginal remains, then determination of the procedure will be directed by the DPLH and the Aboriginal stakeholders.
- If the remains are not historical Aboriginal remains, direction from WA Police will be followed.
- No personnel are allowed to disturb, touch or alter in any way the human remains unless they have been authorised by WA Police or the DPLH.

## 10.10 Monitoring, Auditing and Reporting

BCI will conduct monitoring, auditing and reporting through several responsive and proactive methods including:

- BCIs ground disturbance process
- Site visits and inspections
- Field and desktop audits
- Community, employee or duty-holder advice

Annual audits of the level of compliance with this Plan will be conducted. This will include recommendations for follow up actions or changes where necessary to improve auditability, accountability, compliance or address impracticalities of implementation.

The Heritage Team will be responsible for compiling the information for DPLH to satisfy the reporting conditions under each of the Section 18 approvals (sections 318-324 of the ACHA). This will be done in conjunction with the information provided by the relevant contractor undertaking ground disturbing works. Updates will be provided to the appropriate Traditional Owner groups at the same time it is provided to DPLH.

## 11. PLAN REVIEW BY IMPLEMENTATION COMMITTEE

Review of this Plan will be undertaken after the first year and then biannually by the Implementation Committee under the terms of each LAD unless otherwise agreed with WAC and RRRKAC that a review is not required at that time. Reviews of this Plan will also be undertaken where there has been update to any core legislation as identified in Section 3.3.

Any disputes regarding the management of Aboriginal heritage, or failure to comply with the Plan, will be dealt with by the relevant Implementation Committee and/or under the dispute resolution mechanisms of the LAD.

Copies of this Plan and any related procedures will be provided to the relevant Traditional Owner group in draft for their input and then in final form for signing.

Opportunities will be made available for the Implementation Committee to undertake on country assessments during regular committee meetings.

## 12. APPENDICES

### 12.1 Appendix A – Reference Documents

The following documents are available through the BCI INX/InControl system.

No.	Associated Documents	Document Number
1.	Licence to Operate Obligations Register	
2.	Ground Disturbance Procedure	BCI-ENV-PRO-001
3.	Demarcation and Survey Procedure	0000-CI-PRO-001
4.	Incident Reporting and Management Procedure	BCI-WHS-PR-009 Rev 0
5.	Incident Notification Form	BCI-WHS-FM-009 Rev A
6.	Aboriginal Heritage Management Guidelines for Contractors	MAR-PRJ-CPR-005

## 12.2 Appendix B - BCI Cultural Heritage Policy



# CULTURAL HERITAGE POLICY

## 1. PURPOSE

BCI Minerals Limited and its subsidiaries (BCI or Company) is a development and mining company with key assets in Western Australia. BCI is committed to respecting and protecting cultural heritage in areas where the company is conducting exploration and mining related activities during exploration, development, construction, operation and closure phases. BCI is committed to the principles of free, prior and informed consent and forming meaningful partnerships with Traditional Owners on whose land our activities occur.

## 2. POLICY STATEMENT

We will:

- Support the respect for, and preservation of, cultural heritage through implementing a framework for identifying, documenting and managing aspects of cultural significance.
- Strive to carry out activities in a manner that minimises impacts to cultural heritage. Where we have to disturb areas of cultural significance, we work with Aboriginal People and Traditional Owners to manage such disturbance and implement management measures aimed at preserving the cultural values of the area.
- Demonstrate good corporate governance through compliance with relevant legislation relating to cultural heritage.
- Ensure procedures implemented focus on the identification, reporting, recording and protection of any previously unidentified sites during exploration, development, expansion and construction work.
- Work with Aboriginal people and Traditional Owners to ensure all cultural heritage issues and activities are managed in a culturally appropriate and sensitive manner.
- Engage and consult with Aboriginal people and Traditional Owners during all phases of project development, implementation and closure.
- Work with Aboriginal people and Traditional Owners to develop strategic, sustainable business partnerships with BCI Minerals and other key stakeholders.
- Create workplaces where Aboriginal people and Traditional Owners feel welcome and valued;
- Incorporate cultural and heritage site information into site training, including inductions and refreshers.
- Provide all employees and contractors with cross cultural awareness training in partnership with Aboriginal people and Traditional Owners.
- Consult with Aboriginal people and Traditional Owners appropriately before all ground disturbing activities.

- Support Aboriginal people and Traditional Owners in the development and implementation of commercial and business opportunities.
- Maintain open communication with Aboriginal people and Traditional Owner Groups.
- Communicate this policy to all BCI employees and make it available to the public.
- Communicate to the contractors with which we partner BCI's expectation that they will also fully comply with this policy and applicable legislation.

Alwyn Vorster  
 Managing Director  
 BCI Minerals Limited

## DOCUMENT CONTROL



0	5 May 2022	Issued for use	J Fell	A Glover	Board
Revision	Date	Description	Author	Checker	Approver
<b>Document Number</b>		<b>BCI-ESM-POL-002</b>			<b>Total Pages: 2</b>

*Electronic documents, once printed, are non-controlled and may become outdated.  
 Refer to Electronic Document Management System for the current version.*

## 12.3 Appendix C - Ground Disturbance Procedure

# Ground Disturbance Permit Procedure

## DOCUMENT CONTROL

				
7	04 Oct 2023	Issued For Use	J Neilson	D Smith
6	08 Sep 2023	Issued For Use	J Neilson	D Smith
5	18 Aug 2023	Issued For Use	J Neilson	D Smith
4	05 Jan 2023	Issued For Use	J Neilson	D Smith
3	17 Nov 2022	Issued For Use	J Neilson	D Smith
2	7 Oct 2022	Issued For Use	J Neilson	D Smith
1	31 Mar 2022	Issued For Use	J Neilson	D Smith
0	26 Oct 2021	Issued For Use	J Neilson	B Sterling
Revision	Date	Description	Author	Approver
<b>DOCUMENT NUMBER:</b>		<b>BCI-ENV-PRO-001</b>	<b>Total Pages: 16</b>	

*Electronic documents, once printed, are non-controlled and may become outdated.*

*Refer to Document Management System for the current version.*

## Table of Contents

<b>1.</b>	<b>Purpose</b> .....	<b>3</b>
<b>2.</b>	<b>Objectives</b> .....	<b>3</b>
<b>3.</b>	<b>Requirement</b> .....	<b>3</b>
<b>4.</b>	<b>Scope</b> .....	<b>3</b>
<b>5.</b>	<b>Definitions</b> .....	<b>4</b>
<b>6.</b>	<b>Responsibility</b> .....	<b>5</b>
<b>7.</b>	<b>Legislation</b> .....	<b>5</b>
<b>8.</b>	<b>GDR Process</b> .....	<b>7</b>
8.1	Application and Review .....	8
8.1.1	GDR Applicant.....	8
8.1.2	Endorsement .....	9
8.1.3	Application Review Meeting .....	10
8.1.4	GD Advisor .....	10
8.2	Assessment .....	10
8.3	Approval.....	11
8.4	Implementation and Closure.....	12
8.4.1	GDP Implementation .....	12
8.4.2	Disturbance Activity Permit .....	12
8.4.3	GDP Closure .....	13
8.5	GDP Validity.....	14
8.6	GDP Changes.....	14
8.7	Unauthorised Ground Disturbance .....	14
8.8	Awareness .....	14
<b>9.</b>	<b>GDP Audit Procedure</b> .....	<b>14</b>
9.1	GDP Monthly/Quarterly Desktop Disturbance Audit .....	14
9.2	GDP Closure Desktop Review .....	15
9.3	Site Visit .....	15
9.4	GDP Audit Report .....	15
9.4.1	GDP Results Communication.....	15
<b>10.</b>	<b>References</b> .....	<b>16</b>

## 1. PURPOSE

The purpose of this Procedure is to describe the process and requirements for obtaining, implementing, and closing out works related to any Ground Disturbance for all BCI Projects and Operations.

A Ground Disturbance Permit (GDP) comprised of the Ground Disturbance Request (GDR) which is assessed against the company LTO obligations and a Disturbance Activity Permit (DAP) which details how you must undertake the ground disturbing activity.

A GDP is required to assess any construction works, disturbance or interaction with the ground, this includes any previously disturbed ground if it is for a change of purpose. A GDP is not required for maintenance works, i.e., grading an existing road. However, maintenance works should never create new clearing/disturbance.

An approved GDP authorises the activities described in the GDR Application to be undertaken; it also details the Conditions associated with the works.

A GDP protects the environment, the company (BCI) and the employee/contractor by ensuring compliance with government approvals and conditions.

## 2. OBJECTIVES

The objectives of this Procedure are to outline a process designed to:

- Minimise ground disturbance to the extent possible.
- Manage ground disturbance activities in compliance with all relevant legislative and legal obligations and to be within approved boundaries.
- Identify all known cultural and environmentally sensitive areas to prevent unauthorised disturbance.
- Identify all available topsoil for recovery and stockpiling for later use in rehabilitation works.
- Ensure all completed ground disturbance is surveyed, recorded, and reported.
- Ensure there is authorisation to build the proposed facilities on previously disturbed ground.

## 3. REQUIREMENT

A GDP and DAP is required for any work, operation or activity that results in disturbance of the earth, including but not limited to excavation, digging, trenching, cultivating, drilling, topsoil stripping, land levelling, quarrying, clearing, and construction, including access to the work site. It is important to note that this includes disturbance of marine sediments from piling and dredging activities.

## 4. SCOPE

This Procedure applies to all BCI personnel (including all employees, contractors, and visitors) involved in ground disturbing activities, or the approval of those activities, to be undertaken on all BCI Projects or Operations.

## 5. DEFINITIONS

Term	Definition
Advisor Ground Disturbance	BCI employee assigned to coordinate the ground disturbance approval process.
BCI	BCI Minerals Limited and all subsidiaries.
BCI personnel	BCI personnel (including employees, contractors, and visitors)
Conditions	Specific, non-negotiable requirements that must be met whilst undertaking approved ground disturbance activities.
Environmental Advisor	BCI site-based employee responsible for providing functional support and undertaking compliance activities at the Project site.
GIS Team	BCI Geographic Information System (GIS) employees (or delegates) responsible for the dissemination of quality spatial data, analysis, and mapping products to support the ground disturbance process.
Ground Disturbance	Any work, operation or activity that results in a disturbance of the earth, including but not limited to excavation, digging, trenching, cultivating, drilling, topsoil stripping, land levelling, quarrying, clearing. It is important to note that this includes disturbance of marine sediments from piling and dredging activities.
Ground Disturbance Procedure (GDP)	A Ground Disturbance Permit (GDP) comprised of the Ground Disturbance Request (GDR) which is assessed against the company LTO obligations and a Disturbance Activity Permit (DAP) which details how you must undertake the ground disturbing activity.
Ground Disturbance Request (GDR)	BCI procedure that manages all work, including clearing through the Ground Disturbance Procedure system which ensures assessment of our LTO obligations, and all government regulatory approvals are in place prior to the commencement of works. It also details the Conditions that must be adhered to in connection with the activities.
GDR Applicant	BCI Employee or Contractor assigned with the task of obtaining the GDP, ensuring all pre application constraint analyses are conducted before application submission, verification of clearing data and closeout of the GDP.
GDR Application Review	The process of reviewing the GDR application to allow it to progress to assessment. The review is undertaken by the responsible package engineer or appropriate BCI personnel.
GDP Owner	BCI Employee or Contractor responsible for ensuring all works are undertaken in accordance with the GDP Conditions.
GDR Signatories	BCI representatives assigned to approve relevant Sections of a GDR.
Manager Environment & Approvals	BCI employee responsible for all environmental approvals, along with measuring and reporting on environmental and social compliance across the BCI business.
Principal - Land Access & Heritage	BCI employee responsible for land access and heritage approvals.

Term	Definition
Senior Site Executive	BCI employee (or delegate) accountable for all activities on the Project site.
Disturbance Activity Permit	Site internal permit submitted by GDP Owner to Site Environmental Advisor once GDP has been issued, allows for clearing work to commence. Includes General Information, Environmental Review, pre-start work controls. Application to be assessed up to 3 days after submission.
Site Inspector and Site Supervisor	BCI or Contractor employee responsible for supervising the ground disturbance activities on the project site.

## 6. RESPONSIBILITY

All BCI personnel (including employees, contractors, and visitors) involved in ground disturbing activities, or the approval of those activities, to be undertaken on BCI Projects or Operations must ensure that they understand and comply with the requirements of this Procedure.

All BCI personnel must immediately stop and report to their supervisor any ground disturbance work if they believe any potential unauthorised ground disturbance or breach of a GDP, or this Procedure might have occurred.

A GDP only authorises the clearing or disturbance of the ground, it doesn't authorise depth disturbance or negate other controls such as the dig permit, these permits still need to be acquired.

## 7. LEGISLATION

This Procedure (and the ground disturbance process it describes) is designed to manage compliance with applicable legislation. Relevant Legislative Requirements includes, but is not limited to the following:

- *Aboriginal Heritage Act 1972 (WA).*
- *Environmental Protection Act 1986 (WA).*
- *Environmental Protection and Biodiversity Conservation Act 1999 (Cth).*
- *Environmental Protection (Clearing of Native Vegetation) Regulations 2004 (WA).*
- *Heritage Act 2018 (WA).*
- *Mine Safety and Inspection Act 1995 (WA).*
- *Mines Safety and Inspection Regulations 1995 (WA)*
- *Mining Act 1978 (WA).*
- *Native Title Act 1993 (Cth).*
- *Rights in Water and Irrigation Act 1914 (WA).*
- *Wildlife Conservation Act 1950 (WA).*
- *EPA Guidance Statements No. 51 and No. 56 (Terrestrial Flora and Fauna).*
- *Land Administration Act 1997 (WA).*

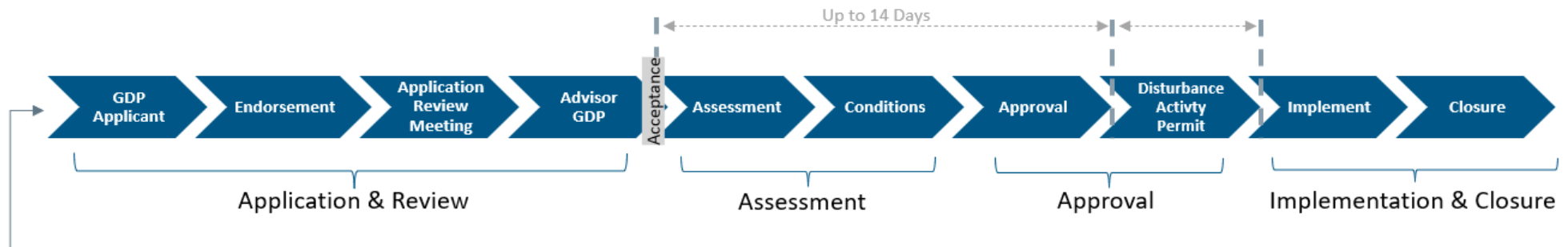
This Procedure (and the ground disturbance process it describes) is designed to manage compliance with BCI's Licence to Operate (LTO).



BCI is committed to preserving its LTO and ensuring BCI's compliance with these obligations.

A breach of the LTO obligations may place BCI in breach of one or more Licence Instruments or relevant Legislative Requirements, may jeopardise BCI's Licence to Operate and could consequently place the Project at risk.

## 8. GDR PROCESS



There are four main phases of the ground disturbance lifecycle:

- Application and Review
- Assessment.
- Approval, and
- Implementation and Closure.

Each phase has its own requirements that needs to be met to allow progression to the next phase, which are described in detail below.

GDRs are assessed and are specific to the activities outlined in section 1 of the GDR Application. Any activities and methodologies that are not described (thus not assessed) in section 1 will need a new GDR so that those activities can be assessed.

Should any works be undertaken that are different to those described within the approved GDP it will be considered a breach of the GDP, e.g., a GDP issued for a borrow pit cannot be used as a laydown area.

## 8.1 Application and Review

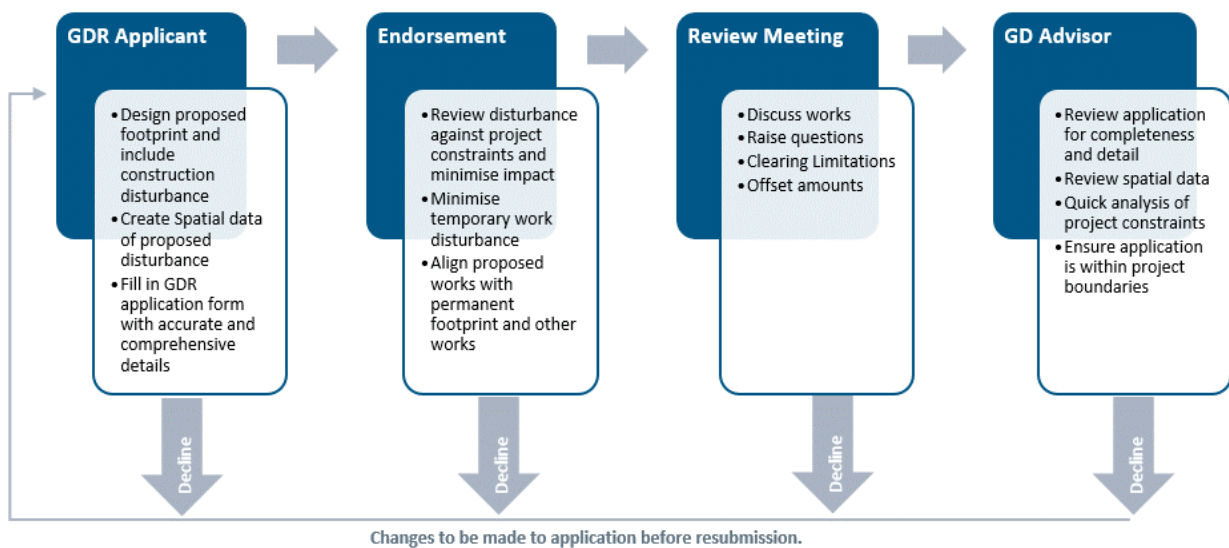
There are four steps as part of this phase as described below.

- GDR Application.
- Endorsement
- GD Advisor/Manager Assessment, and
- Application Review Meeting

To enable the application to be assessed, it needs to have appropriate information and details. Should the application not contain enough information or not meet LTO requirements, the request will be declined, and the Applicant to make the necessary adjustments and re-submit the application.

Advice from the GD Advisor/Manager will be given on the required changes needed to allow the application to progress to the next phase.

Prior to the application progressing to Assessment phase, an Application Review Meeting is required between the GDR applicant, Manager Environment, Manager Land Access & Heritage, and Manager Spatial Services (or delegates) to determine if there are any issues that require addressing. This step enables any questions or concerns to be raised before moving to the assessment phase.



### 8.1.1 GDR Applicant

Prior to any ground disturbance activity being undertaken on BCI Projects or Operations, a GDR Application Form (**BCI-ENV-FRM-001**) must be completed, which is available through Document Control/InEight.

The GDR applicant will describe in detail the proposed works to be undertaken and provide justification on why the clearing of the proposed area is required. The application will consider all disturbance works required to complete the task including but not limited to mining activities, construction, bore installation, borrow pits, levee walls, construction laydowns, access roads, topsoil stockpiles, turkey's nests, etc. If the description is too vague, i.e., not detailed enough, the applicant will be asked to provide additional information.

The application should consider access to the work location. i.e., should existing tracks not be suitable, a new track or additional clearing may be required to access the site and bring in the required equipment.

For ease of assessment, it is recommended to avoid the use of engineering/construction acronyms and jargon as the GDR will be reviewed by subject matter experts who may not understand the language.

The accompanying spatial data must be in the form of enclosed boundary polygons in ESRI shapefile/geodatabase format (preferred) or CAD format (Datum GDA2020 Zone 50). Please note, Google Earth .kmz/kml files will not be accepted.

Where practicable the proposed works should take into consideration the use of existing cleared areas and minimise any new areas to be cleared.

The GDR Applicant is responsible for ensuring Section 1 of the GDR form is complete, and that all required documentation/spatial data is provided with the GDR Application.

It is assumed that the application boundary will be the limit of disturbance. i.e., the whole application boundary will be cleared. When the GDR Application form is complete, the GDR Applicant must email it to [gdp@bciminerals.com.au](mailto:gdp@bciminerals.com.au) for assessment and approval.

### 8.1.2 Endorsement

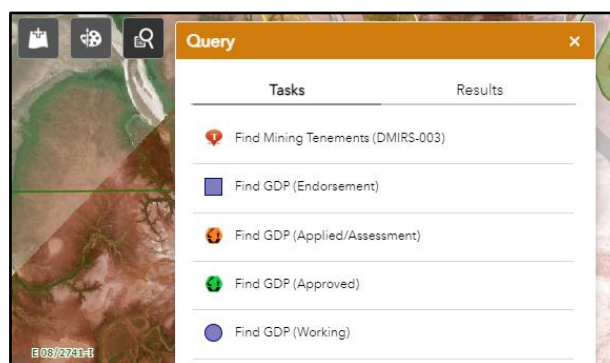
Each application will need to be reviewed and endorsed by the responsible package engineer or the relevant BCI person who is responsible for the works package.

Once an application is submitted, the spatial data for each application will be loaded into the BCI Webmapping platform for review and the responsible package engineer or the relevant BCI personnel will be notified of its availability.

The Endorser will consider the following:

- Review proposed disturbance against project constraints and project boundaries and minimise impact. e.g., MS1175 clearing limits.
- Review proposed disturbance against the approved project footprint and provide justification for any works outside this footprint.
- Minimise temporary work disturbance. Where possible temporary works (e.g., Construction laydown) should be located where they have the least impact on project constraints and where possible in the same location of future permanent works.

To view the application boundaries in Webmaps, load the GDP Overview and Constraints map, click on Query Tool, GDP (Working) and select relevant GDP.



The relevant application boundary will be loaded into the layers list and highlighted in the map.

Should there be any issues identified at this stage, the GDR Endorser will liaise with the GDR Applicant to adjust the application boundary.

When the GDR Endorser is satisfied with the proposed area and there are no issues with the application boundary, the Advisor Ground Disturbance will organise the Application Review Meeting.

### 8.1.3 Application Review Meeting

Prior to the application progressing to Assessment phase, an Application Review meeting may be required between the GDR applicant, GDR Endorser, Manager Environment, Manager Land Access & Heritage, Site Environment Advisor and Manager Spatial Services (or delegates) to determine if there are any issues that require addressing.

This quick half hour meeting enables any questions or issues to be raised, to ensure compliance with project boundaries and whether the application intersects any project No-Go areas (e.g., heritage sites) etc and will allow any issues to be resolved which may hold up the assessment and approval of the GDP.

Please refer to the Application Review Checklist (0000-EV-CHK-0001), available through Document Control for the proposed agenda items for this meeting.

### 8.1.4 GD Advisor

Once any concerns raised during the Application review meeting have been addressed the GDR will be reviewed by the GD Advisor.

This phase of the process is a detailed quick check to ensure that any disturbance outside the proposed project footprint is accounted for, and that priorities and timelines can be managed.

Should the application be incomplete, not include spatial data, have incorrect spatial data, not contain enough information, or have incorrect details it will be declined.

The Applicant is responsible for making the necessary adjustments and re-submitting the application.

Once satisfied, the GD Advisor will notify the Applicant and Endorser the GDR has been accepted and will progress to the assessment phase.

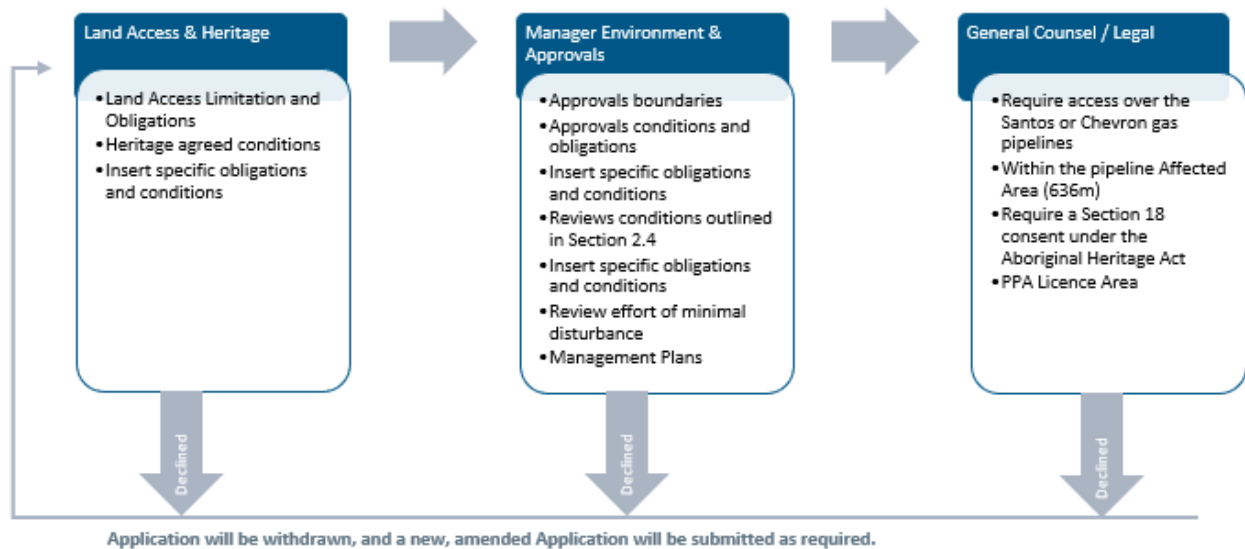
## 8.2 Assessment

The assessment phase may take up to 14-days in total, however all efforts will be made for a quick turnaround.

Note: any major changes required to the assessment boundary will reset the 14-day assessment period.

The following signatories will assess the application:

- Specialist, Land Access and Tenure.
- Specialist, Heritage.
- Manager Environment Approvals, and if required
- General Counsel/ Legal.



The Application boundary will be assessed 'as is', as a minimum, the application will be assessed against the following details:

- Environmental approval boundaries.
- Ministerial Statement disturbance limitations
- Land tenure boundaries
- Heritage survey and monitoring areas.
- Cultural heritage sites and/or exclusion zones
- Any known environmentally sensitive areas
- Known major watercourses (if applicable).
- Bore locations.
- Pastoral station infrastructure.
- Petroleum pipelines, affected area, safety zones and exclusion areas.
- Utility services.

The GDR Signatories will review the Application and insert any additional specific Conditions within the Application form (Section 2).

Should the assessment identify that the proposed ground disturbance activities cannot proceed, the applicant will be notified as soon as possible to discuss and jointly agree on a process for resolving the issue in conjunction with relevant stakeholders/subject matter experts.

At any stage if the application does not adhere to any constraint or LTO obligation, signatories can decline the Application. A new amended Application will need to be submitted to GDR for Approval and Acceptance.

Advice from the GD Advisor or signatories will be given on the required change to allow the application to progress to the next phase.

Any works described below will be escalated to BCI's Legal Team for review and authorisation.

- Require access via the temporary crossing over the Santos/Chevron gas pipelines.
- Within the Affected Area (636m) of the Santos/Chevron gas pipelines (Mardie Project); or
- Require a Section 18 consent under the *Aboriginal Heritage Act, 1972*
- PPA Licence area

### 8.3 Approval

Once Section 2 of the Application has been completed a GDP number will be assigned to the GDR and it will be loaded into DocuSign for GDP Signatories authorisation.

GDP Approval (Section 3 of the Application) will then take place, with all signatories reviewing and signing the document when they are satisfied with content. If there are any errors/omissions discovered, revert to Section 2 of the document again.

The final step in approval is review and acceptance and sign off on all conditions by the Senior Site Executive.

The Senior Site Executive will accept the conditions and responsibility by signing the Permit (Section 4 of Permit).

When all signatures have been received, the Advisor Ground Disturbance will issue the approved GDP and spatial data (ESRI Shapefile format) to the Applicant through Doc Control. The approved and final GDP will be provided to BCI employees and Contractors via InEight.

Upon receipt of the authorised GDP, the Applicant is to:

- Become familiar with the GDP, including reviewing, and ensuring they understand all Conditions.
- Where it is identified that a Condition cannot be met, the Applicant shall liaise with the Advisor Ground Disturbance as soon as possible to discuss and jointly agree on a process for resolving the issue (in conjunction with relevant stakeholders/subject matter experts).

## 8.4 Implementation and Closure

### 8.4.1 GDP Implementation

Once a GDP has been issued, the GDP Applicant and Owner are responsible for familiarising themselves and any personnel involved with the works of the conditions of the GDP. The GDP or works supervisor shall ensure that all personnel involved in the ground disturbing works have signed-on (Section 4) verifying that they have read and understood each of the Conditions.

The Applicant or works supervisor will forward a copy of the completed section 4 of the application to the GD Advisor ([gdp@bciminerals.com.au](mailto:gdp@bciminerals.com.au)) once everyone has signed onto the GDP.

### 8.4.2 Disturbance Activity Permit

The last critical control prior to any Ground Disturbing activities is the application of a Disturbance Activity Permit (DAP). The DAP form (0000-EV-FRM-0006) is available through Document Control.

The GDP Owner must have an approved Disturbance Activity Permit before any works can commence.

A Disturbance Activity Permit will be required before any ground disturbing activities occur in both the terrestrial and marine environments.

The DAP ensures, where applicable:

- That all critical controls are in places as notified in the overarching GDP.
- The approved disturbance boundary is surveyed, demarcated, and flagged in accordance with the BCI demarcation standard (**Mardie Salt and Potash Project Demarcation and Survey Procedure 0000-CI-PRO-0001**).
- Ensure that any known environmentally or culturally significant or restricted areas as identified in the GDP Conditions are surveyed, demarcated, and flagged. This includes,



but not limited to whether there is a requirement for Cultural Monitoring or Fauna Spotters/ Marine Fauna Observers to be present during clearing activities.

- The GDP holder or works supervisor shall ensure a complete copy of the GDP is available at the location of the ground disturbance until all the works specified in the GDP are complete.
- All relevant parties involved in undertaking disturbance works are required to sign onto the DAP to show they have understood all controls and measures are in place.
- The Disturbance Activity Permit is only valid for 30-days (unless agreed with the Senior Site Executive or Alternate Senior Site Executive), if works extend beyond this period a new Disturbance Activity Permit will be required to be issued from the Senior Environmental Advisor or delegate.
- There can be many DAP's within an overarching GDP.

Note, no ground disturbance shall occur until the approved area has been surveyed, flagged (not applicable to works within the marine environment) and the Disturbance Activity Permit signed onto by all relevant parties.

The Ground Disturbance Permit (GDP) will remain the overarching document and the Disturbance Activity Permit (DAP) will be the site based document to serve as a final checklist to ensure all controls are in place. DAP's will be closed out when the works relevant to the specific DAP are closed out i.e., for piling activities this would include the completion of each bent and the noise data (where applicable) has been received.

#### 8.4.3 GDP Closure

To enable the overarching GDP to be closed, there are several considerations which need to be signed off on the Disturbance Activity Permit(s), including:

- Post Disturbance Inspection.
- Reporting of any environmental incidents associated with the GDP.
- Rehabilitation (where applicable).
- Submission of topsoil records.
- Removal of pegs upon completion of close out.
- Submission of spatial data to BCI's GIS Department.

All ground clearing activities are required to be surveyed and 'as cleared' data sent to BCI GIS [gis@bciminerals.com.au](mailto:gis@bciminerals.com.au). The GIS team will convert the data and send to the Site Environmental Advisor's for verification. Once the data is verified the Disturbance Activity Permit will be closed and Ground Disturbance Advisor will notify the applicant to submit Section 5 Post Disturbance Confirmation. The Ground Disturbance Advisor will organise for the GDP to be closed.

At a minimum the as cleared data supply will hold information on extents of features on Ground (including defining topsoil stockpiles), Description of Features, GDP number, DAP Number, in accordance with **MAR-0000-GT-STD-BCI-000-0001 GDP and Utility Services data delivery standard and MAR-PRJ-CPR-003 - CAD Build Drawing Presentation Manual**.

Once the disturbance boundaries have been imported into the GIS, the GIS team will engage with the GDP applicant and Senior Environmental Advisor to ensure correct attribution of data in accordance with our annual government reporting requirements and to satisfy LTO obligation reporting.

All active GDP's will have aerial imagery captured every three months at a minimum to review compliance with the approved boundary.

The GDP Applicant is required to complete Section 5 of the GDP and submit the signed documentation to the Advisor Ground Disturbance ([gdp@bciminerals.com.au](mailto:gdp@bciminerals.com.au)).

Once received, the Advisor Ground Disturbance will note the GDP as "closed" in the BCI GDP Register and no further works can be undertaken under this GDP.

## **8.5 GDP Validity**

The GDP is only valid for the scope of works described in the GDP application, or until any environmental approval, tenement or agreement associated within the GDP expires or is revoked (whichever comes first). The Ground Disturbance Permit is valid for a period of 12 months from the date of approval, or the end date specified on the GDR, whichever is sooner. If work not undertaken within this time a new GDR Application must be submitted.

## **8.6 GDP Changes**

GDRs are assessed on the scope of work outlined in section 1 of the GDR application.

Any change in scope that deviates from the specific works will require a new GDR application, so the new scope of works can be assessed.

Any works that are undertaken that deviate from that outlined in section 1 of the GDR application will be treated as an incident to be investigated in accordance with the BCI Incident Investigation Process.

## **8.7 Unauthorised Ground Disturbance**

Any breach of this Procedure and/or Conditions within a GDP are to be reported immediately to the Site Supervisor who will treat the matter as an incident in accordance with the BCI Incident Investigation Process.

## **8.8 Awareness**

It is the responsibility of the relevant BCI (and Contractor) Manager to ensure that all personnel involved in GDP applications or ground disturbing activities are familiar with and understand this Procedure.

## **9. GDP AUDIT PROCEDURE**

To assist in the prevention and avoidance of GDP non-compliances, a GDP audit procedure will be conducted by BCI via a five-step process.

### **9.1 GDP Monthly/Quarterly Desktop Disturbance Audit**

The routine audit will investigate whether the following processes are being met:

- Spatial data is provided by the contractor/GDR applicant including actual cleared area, topsoil stockpiles and volume, and utility service locations.
- Disturbance is within GDP boundary and the shapefile is in the correct location.
- Upholding of specific GDP conditions (e.g., monitoring data requirements or fauna spotter catcher engagement etc.).
- Ensure disturbance is as described in Section 1 of GDR Application.

- Updating of clearance dashboard calculations to ensure clearing limits (MS1175, EPBC 2018/8236 and NVCP's) are being met.
- Corrective actions followed accordingly for any incidents.

## 9.2 GDP Closure Desktop Review

Once the GDP has been closed, a Desktop Review will be completed within two weeks of the closure. This audit process will undertake the same steps outlined in section 9.1, in addition to investigation of the following process:

- Capturing of completed disturbance with RPAS/aerial imagery.

## 9.3 Site Visit

A site visit will be conducted within two weeks of the completion of the GDP Closure Desktop Review to provide evidence to support the audit. The process includes but is not limited to:

- Ground truthing.
- Checking the area of ground disturbance to confirm there is no unauthorised clearing.
- Collection of photographic evidence of cleared area.
- Conducting of interviews.

## 9.4 GDP Audit Report

A GDP Audit Report will be conducted within two weeks of the completion of the GDP Site Visit. The process includes:

- A summary of works completed (attach closed out GDP), including but not limited to; incidents, total area disturbed, volume of topsoil, vegetation type cleared, fauna sightings, heritage sightings, cultural monitors present as required, and priority species sighted or impacted in cleared area.
- Update and summary of clearance dashboard calculations to ensure clearing limits (MS1175, EPBC 2018/8236 and NVCPs) are not exceeded.
- Summaries of both the desktop review and site visit activities.
- Compliance determination.
- Learnings and relevant actions resulting from GDP audit.

### 9.4.1 GDP Results Communication

Results will be communicated via the following processes:

- Internal communications with site and business.
- Development of GDP Audit folder.
- Use of INX software (InControl and In-Form).
- Development and on-going contributions to a GDP Audit spreadsheet (including a summary of audit and compliance commentary with a link to the report and evidence).


## 10. REFERENCES

Document Number	Definition
BCI-ENV-FRM-001	GDR Permit Application Form
0000-EV-FRM-0004	Application Review Checklist
0000-EV-FRM-0006	Disturbance Activity Permit
0000-CI-PRO-0001	Mardie Salt and Potash Project Demarcation and Survey Procedure
MAR-0000-GT-STD-BCI-000-0001	GDP and Utility Services data delivery standard
MAR-PRJ-CPR-003	CAD Build Drawing Presentation Manual

## 12.4 Appendix D - Demarcation and Survey Procedure

# MARDIE SALT AND POTASH PROJECT

## DEMARCATIION AND SURVEY PROCEDURE

			2021.10.21 13:33:44 +08'00'		Digitally signed by Gareth Fleming DN: cn=Gareth Fleming, c=AU, o=BCI Minerals, ou=Projects, email=g.fleming@bciminerals.com.au Date: 2021.10.21 15:14:40 +08'00'
0	15-Oct-2021	Issued for Use	J Armstrong	A Mitchell	G Fleming
B	15-Oct-2021	Issued for review	J Armstrong	A Mitchell	G Fleming
A	16-Apr-2021	Draft for review	L Purves	N Dixon	M Klvac
Revision	Date	Description	Author	Checker	Approver
<b>Document Number</b>		<b>0000-CI-PRO-0001</b>			<b>Total Pages: 5</b>

*Previously Issued as MAR-0000-EV-PRO-BCI-000-0002*

*Electronic documents, once printed, are non-controlled and may become outdated.  
Refer to Electronic Document Management System for the current version.*

## Table of Contents

<b>1. Purpose</b> .....	<b>1</b>
<b>2. Scope</b> .....	<b>1</b>
<b>3. Responsibility</b> .....	<b>1</b>
<b>4. Standards</b> .....	<b>1</b>
<b>5. Definitions</b> .....	<b>1</b>
<b>6. Safety</b> .....	<b>1</b>
<b>7. PPE and Materials Required</b> .....	<b>1</b>
<b>8. Requirements</b> .....	<b>2</b>
8.1 Survey Requirements .....	2
8.2 GIS and Data Requirements .....	2
8.3 Demarcation and Flagging Requirements.....	3
8.3.1 Demarcation of Ground Disturbance/Clearing Areas.....	3
8.3.2 Pegging Aboriginal Heritage Sites .....	3
<b>9. Records</b> .....	<b>4</b>
<b>10. References</b> .....	<b>4</b>
<b>Appendices</b> .....	<b>5</b>

## List of Appendices

Appendix 1 : Demarcation and Flagging Poster



## 1. PURPOSE

The purpose of this document is to:

- To identify survey standards ahead of proposed ground clearing/disturbance activities for exploration, development, construction and operational purposes in relation to heritage and environmental matters.
- To identify demarcation and flagging standards for exploration, construction, operations and safety purposes in relation to heritage and environmental matters. This will ensure that no unapproved clearing or ground disturbance is undertaken or disturbance to an area of environmental or heritage significance.

## 2. SCOPE

This work instruction covers the survey and demarcation/flagging of areas associated with operations, safety, exploration, heritage and the environment by BCI Minerals (BCI) employees and contractors on any BCI operated site.

## 3. RESPONSIBILITY

All BCI staff and contractors are responsible for implementing this Work Instruction.

## 4. STANDARDS

Nil.

## 5. DEFINITIONS

Nil.

## 6. SAFETY

Personnel are to ensure they complete a Task Hazard Analysis Form (THA) (BCI-OHS-FM-005D) prior to undertaking activities outlined within this Work Instruction.

## 7. PPE AND MATERIALS REQUIRED

PPE	Materials
Safety Glasses	Demarcation cones/flagging tape
Sunscreen (optional)	Hammer
High visibility long sleeve shirt	Steel droppers/wooden pegs
Steel cap boots	Wire cutters or pliers
Long pants (with Gators where applicable)	GPS
Hard hat	Map
Gloves (optional)	Two-way radio / Sat phone / Tracker (if remote)

PPE	Materials
Fly net (optional)	Water

## 8. REQUIREMENTS

### 8.1 Survey Requirements

All surveys being undertaken for BCI projects, whether for environment, heritage, exploration, mining or construction works, are to ensure the following is undertaken:

- Areas of significance are to be demarcated in accordance with flagging colours specified in Section 8.3. Areas of significance include:
  - Environmental sites
  - Cultural heritage sites.
- Ground Disturbance demarcation in accordance with flagging colours specified in Section 8.3
- GPS coordinates are to be recorded for all areas of significance and forwarded to the BCI Minerals GIS Coordinator (detailed in Section 8.2).

### 8.2 GIS and Data Requirements

It is a requirement that all new or modified spatial data relating to all BCI projects are supplied to the BCI Mineral GIS Coordinator within 1 week of completion of all surveys/works.

Acceptable data formats:

- Shapefile (preferred);
- MapInfo;
- DXF;
- DWG; and
- DGN.

Required information includes:

- • Site ID's;
- • X/Y coordinates;
- • Survey dates; and
- • What was identified (i.e. bore type, GDP ).

The survey extent will also be recorded. This is required by BCI to determine future survey areas, fulfill reporting obligations and to assist in site auditing. In the event GIS data cannot be supplied, at a minimum, a marked-up map is to be provided which the GIS Coordinator can then digitise.

### 8.3 Demarcation and Flagging Requirements

The following demarcation/flagging to be used in is listed below.

Area	Purpose	Demarcation/Flagging Type
Operations	Operational Hazards	Orange Cones with White Socks
	Active Workshop	Red Cones with Green Socks
Safety	Danger	Red and White Flagging Tape
	Hazards	Black and Yellow Flagging Tape
All Areas	Ground Disturbance/Clearing	Pink Flagging Tape
Heritage	Significant Sites	White PVC Pipe
Environment	Significant Sites	Blue and White Striped Flagging Tape
Exploration	Proposed Drill Holes	Yellow or Red Flagging Tape

A demarcation/flagging information poster is to be displayed on site on pin up boards to inform BCI employees and contractors of the demarcation/flagging procedure. This poster is provided as Appendix 1.

#### 8.3.1 Demarcation of Ground Disturbance/Clearing Areas

The outer perimeter of proposed disturbance/clearing areas is to be pegged at line of sight to demarcate the extent of the clearing/disturbed area (spacing may need to be reduced to 'line of site' in the event thick vegetation is encountered). Each peg must have pink flagging tape securely tied around the top of the peg and the relevant Ground Disturbance Permit (GDP) Number written on it. Three pegs must also be placed at each corner of the proposed clearing/disturbance area, with pink flagging tape running between them to clearly identify the corner extents of the proposed clearing/disturbance area.

Specific requirements in relation to clearing/disturbance areas are provided in the Ground Disturbance and Topsoil Stockpiling Work Instruction (BCI-SUS-PRO-002-2).

#### 8.3.2 Pegging Aboriginal Heritage Sites

White PVC pipe are to be placed every 5m around the edge of a heritage site. This creates a strong visual boundary.

Pegging heritage sites is to be undertaken as follows:

- Ensure all equipment (detailed in Section 7) is packed in the vehicle prior to leaving.
- Upload the Aboriginal Heritage Site polygon onto a GPS device.
- Drive to the Aboriginal Heritage Site and park close by using existing tracks where possible.
- Begin walking around the perimeter of the Aboriginal Heritage Site using the GPS, and carrying a supply of star pickets and PVC pipe.
- Drive a star picket in the ground every 5 meters, place PVC Pipe over star picket and continue for entire perimeter.

Heritage sites considered to be of high significance require additional protection to ensure avoidance. These sites are to be pegged as detailed above, however star pickets are used in conjunction with PVC

pipe to create a more permanent boundary. Wire is also to be run between PVC Pipe using star pickets, and signage installed

## 9. RECORDS

All survey and GIS information is to be collected as per the relevant standards or company procedures and will be stored at the BCI Head Office.

## 10. REFERENCES

Document Number	Title
MAR-0000-LH-PLN-BCI-000-0001	Cultural Heritage Management Plan.
BCI-SUS-PRO-002-2	Ground Disturbance and Topsoil Stockpiling Procedure
BCI-WHS-PR-004-0	Hazard and Task Based Risk Management Procedure

## APPENDICES

Appendix	Document Number/Author/Source
Appendix 1 – Demarcation and Flagging Poster	N/A

**Appendix 1 Demarcation and Flagging Poster**

<p><b>Active Workshop</b></p> 	<p><b>Operational Hazards</b></p> 
<p><b>Safety – Danger</b></p> 	<p><b>Safety – Hazards</b></p> 
<p><b>Ground Disturbance/Clearing</b></p> 	<p><b>Heritage - Significant Sites</b></p> 
<p><b>Environment - Significant Sites</b></p> 	<p><b>Exploration – Proposed Drill Holes</b></p> 

## 12.5 Appendix E – Incident Reporting and Management Procedure



# BCI MINERALS LIMITED

## INCIDENT REPORTING AND MANAGEMENT

			Natalie Eastough <small>Digitally signed by Natalie Eastough Date: 2021.11.17 15:10:29 +0800</small>	Hannah Elms <small>Digitally signed by Hannah Elms Date: 2022.01.25 09:08:41 +0800</small>	Jim Cooper <small>Digitally signed by Jim Cooper Date: 2022.01.25 16:20:05 +0800</small>
0	17/11/2021	Issued for Use	N. Eastough	H. Elms	J. Cooper
A	19/02/2021	Initial	S. Howitt	C. Louw	C. Louw
<b>Revision</b>	<b>Date</b>	<b>Description</b>	<b>Author</b>	<b>Checker</b>	<b>Approver</b>
<b>Document Number</b>	<b>BCI-WHS-PRO-009</b>				<b>Total Pages: 22</b>

*Previously Issued as BCI-WHS-PR-009-A and BCI-WHS-GUI-001-A*

*Electronic documents, once printed, are non-controlled and may become outdated.  
Refer to Intranet or Electronic Document Management System for the current version.*

## Contents

<b>1. Purpose.....</b>	<b>3</b>
<b>2. Scope .....</b>	<b>3</b>
<b>3. RESPONSIBILITY.....</b>	<b>3</b>
<b>4. Incident Management .....</b>	<b>4</b>
4.1 Immediate Actions .....	4
4.2 Notification & Reporting .....	5
4.2.1 All Incidents.....	5
4.2.2 Notifiable Incidents .....	5
4.2.3 Potentially fatal incidents / Significant incidents.....	6
4.2.4 Emergency Contact Notification .....	6
4.2.5 Legal Professional Privilege Process.....	7
4.2.6 Communication Matrix .....	7
4.3 Incident Classification .....	8
4.3.1 Counting days lost or restricted work days.....	8
4.3.2 Injury Classification Matrix.....	9
<b>5. Incident Investigation .....</b>	<b>12</b>
5.1 General Investigation Requirements .....	12
5.1.1 Severity Matrix to determine level of Investigation .....	13
5.2 Planning.....	13
5.3 Data Collection – PEEPO ME .....	14
5.4 Data Organisation .....	15
5.4.1 Constructing a Timeline .....	15
5.4.2 5 WHYS .....	16
5.4.3 ICAM Analysis.....	16
5.5 Just Culture.....	18
5.6 Investigation Outcomes – Corrective and/or Preventative Actions .....	19
5.7 Record and Report the Findings.....	20
5.8 Monitor, Review and Close Out .....	21
<b>6. Communication of Incidents and Lessons Learnt.....</b>	<b>21</b>
<b>7. DEFINITIONS &amp; REFERENCES .....</b>	<b>21</b>

## 1. PURPOSE

The purpose of this incident management procedure is to address the requirements associated with the initial response, reporting, classification and investigation of incidents within BCI Minerals (BCI). This procedure outlines requirements for effective finalisation, corrective actions and communication of incidents to ensure lessons are learnt. The reporting and recording of incidents include:

- Injury / Illness
- Environmental incidents
- Community / Heritage
- Equipment loss or damage
- Security related incidents (theft, assault, extortion etc.)
- Near Miss events

This procedure also outlines a process for near miss reporting and investigation and regulatory agency notification for any statutory reporting of notifiable work-related injuries, dangerous incidents and/or critical incidents.

## 2. SCOPE

The requirements of this document and its subsidiary documentation and systems shall apply to all workers and other persons performing work or related activities under BCI control. If a visitor is involved in an incident on a BCI site, they will also be required to participate in compliance with this procedure.

## 3. RESPONSIBILITY

Roles	Responsibility
Executive Team Member	<ul style="list-style-type: none"> <li>• Escalation of any significant incident occurrences to the Managing Director (MD) as required.</li> <li>• Ensure sufficient resources within their control are applied to fully implement all aspects of this procedure, including investigation requirements.</li> <li>• Review and approval of Incident Cause Analysis Method (ICAM) incident reports, ensuring adequacy of investigation and implementation of all corrective actions.</li> <li>• Seek legal opinion regarding if any investigation requires legal professional privilege.</li> <li>• For significant incidents, authorisation of work to return following required investigation activities have been completed and implementation of immediate actions.</li> </ul>
Registered Manager	<ul style="list-style-type: none"> <li>• Registered Manger (RM) responsible for ensuring mine record book and accident logbook entries are made as required by legislation.</li> <li>• For significant incidents, authorise work to return following required investigation activities have been completed and implementation of immediate actions.</li> <li>• Review and approve all incident reports and investigation findings ensuring adequacy of investigation and implementation of all corrective action.</li> <li>• Ensure all required personnel are trained to carry out investigations.</li> <li>• Ensure lessons learnt are communicated.</li> </ul>

Roles	Responsibility
Line Supervisor and/or Line Superintendent	<ul style="list-style-type: none"> <li>• Ensure immediate action is taken, as required, to minimise risk within the workplace. This includes but is not limited to: suspending operations in immediate vicinity, ensuring evacuation processes, ensuring appropriate treatment for injuries is obtained and securing the scene.</li> <li>• Ensure a process is in place for ensuring the area involved in an incident is contained and commence the initial investigation at the scene of an incident.</li> <li>• Immediate escalation of significant events to the responsible Executive Manager.</li> <li>• Classification of incidents, and when required seek advice from health and safety or the Registered Manager regarding classification.</li> <li>• Ensure all incident details are entered into the incident management system.</li> <li>• Ensuring all personnel under their supervision comply with this procedure.</li> <li>• Responsible to ensure all non-significant investigation requirements completed and actions closed out appropriately.</li> <li>• Cooperate with any regulatory bodies (EPA, DMIRS) associated with incident reporting and/or incident investigation.</li> </ul>
Health and Safety Department	<ul style="list-style-type: none"> <li>• Assist and support with any incident classification, reporting and investigation processes.</li> <li>• Assist with the communication regarding lessons learnt with BCI sites.</li> <li>• Ensure this procedure is reviewed and updated according to required frequency.</li> <li>• Facilitate the implementation of the requirements of this procedure, including providing advice, training and support.</li> <li>• Audit compliance in relation to this procedure and any associated referenced documentation.</li> <li>• Responsible for ensuring a process is in place for the reporting any notifiable incidents to the regulator, pursuant to legislation.</li> </ul>
Employees and Contractors	<ul style="list-style-type: none"> <li>• Shall report all incidents within timeframe requirements to their line supervisor.</li> <li>• Make the incident area safe (where safe to do so) to ensure the health, safety and welfare of any person(s) affected are protected.</li> <li>• Participate in any incident investigations as required under this procedure.</li> <li>• Adhering to the requirements as outlined in this procedure.</li> </ul>

## 4. INCIDENT MANAGEMENT

### 4.1 Immediate Actions

#### Emergency Response

- Personnel shall take immediate steps to stabilise or quarantine the area, if safe to do so, and not disturbed unless actions are required to save life or prevent further loss.
- Immediate, appropriate medical attention shall be arranged for injured and affected persons.
- Notify site emergency response personnel following the emergency response process.
- Personnel involved in or witness to the event, are to be provided an appropriate level of care and concern post the incident to ensure they are not adversely affected. This may include making available rest before return to work up to employee assistance program information (BSS).

## Notification and classification

- Report incident internally per communication matrix in this procedure
- Any incident that results in a death, serious injury or illness, incapacity or is deemed by the involved person to be potentially classified as a significant incident shall be reported to the department executive and corporate HS immediately.
- For serious incidents, ensure scene is preserved until authorities give permission to re-enter the area. Further emergency response requirements are detailed with the BCI Emergency Management Plan and associated protocols.

## Commence Investigation

- Identify what evidence at the scene requires cataloging/ securing before scene is disturbed
- Take photographs/survey (required immediately due to the risk of contamination)
- Identify involved and associated personnel to schedule availability for interviews
- Test for substance abuse as required by procedure
- All Potentially Fatal / Significant Incidents must be investigated using the ICAM or equivalent methodology.

## 4.2 Notification & Reporting

### 4.2.1 All Incidents

Verbal notification of the incident shall occur as soon as reasonably practicable, but within the shift the incident occurred in, to their line manager.

Where the worker and their line manager are contractors, the line manager shall also notify the BCI package / area lead as soon as reasonably practicable and with in the shift the incident occurred in.

Initial details of the incident shall be entered into INX within 24 hours of the incident occurring

All incident investigations are to be completed with in fourteen days of the initial incident report by the incident owner

Exemptions are by exception, and shall be approved by the Registered Manager or Department Executive as applicable.

Personnel with knowledge of the event are prohibited from posting to social media in relation to the involved person, or the event itself unless thy are an authorised BCI spokesperson (refer to social media policy)

### 4.2.2 Notifiable Incidents

Notifiable incident is any event that a regulator identifies as being reportable to them, to ensure information remains current personnel must refer to the relevant regulator website and guidelines. Regulatory bodies that BCI may be required to report to include:

- WA Commerce / DMIRS
- Energy Safety
- Department of Environment
- Department of Health
- Port Authority

Following a Notifiable Incident, immediate verbal and written notification shall be provided to the relevant authority by the Registered Manager.

The Registered Manager shall ensure the record is updated in the relevant logbook and notification to the appropriate District Inspector.

#### **4.2.3 Potentially fatal incidents / Significant incidents**

The incident owner shall notify their line manager of all potential significant / potentially fatal incidents immediately, regardless of the time of the day or the day of the week.

Once the incident classification has been confirmed, the line manager shall inform the Registered Manager who is then to notify the Department Executive and Corporate HS immediately.

An ICAM or Equivalent level of investigation shall be completed and signed off by the incident owner within 14 days of the incident date (exemption by exception)

Significant events such as severe injuries, high potential events or rule breaches may, at the discretion of the Managing Director, require an 'immediate teleconference' to gain further incident detail and ensure business focus. This shall be facilitated by the Executive Team member and Principal Health and Safety, or delegate, within 24 hours of the event occurring.

Legal Professional Privilege (LPP) shall be used in the case of fatalities and should be considered for other cases of actual significant incidents and serious injuries

Work shall not resume until the Registered Manager / Senior Site Official has confirmed that actions have been taken to reduce the risk of recurrence and authorised work to resume.

#### **4.2.4 Emergency Contact Notification**

Where incidents, or injuries are of a particularly significant nature, and the involved person(s) is conscious, they are to be asked if they wish their emergency contact to be notified.

Where the involved person(s) is unable to provide their consent, the SSO, senior HS or licenced health care practitioner can make the decision to notify their emergency contact in consultation with the involved persons line manager.

In the first instance, any such notification should be performed by HS or People and Services, who may elect to have the involved persons line manager with them at the time of the notification.

Notifications to emergency contact shall be made promptly in an appropriately dignified and understanding manner.

Determine details of information to be notified, who will be notified and notification team

- Basic details to be provided to emergency contact, subject to each specific circumstance include:
  - Name of the involved person (no other names provide due to respect for other families)
  - Date and time of the incident
  - General location of incident
  - A brief Factual summary of the events surround in the incident as directly pertaining to the involved person
  - Details of company employee assistance program and any other available support
- Fatality - preferably in person as soon after the police have visited
- No fatality – by phone with the intent to meet face to face

#### 4.2.5 Legal Professional Privilege Process

Any incident or event which falls within the actual or potential level 4 or 5 classification shall be assessed for Legal Privilege between the Executive Manager and Principal Health and Safety as soon as is practically possible.

Any potential Legal Privilege events shall be immediately referred to BCI General Counsel and Managing Director.

Once an event has been escalated through legal privilege, information may only be shared (including, but not limited to government agency) upon obtaining approval by the BCI Legal Counsel.

- a) Scope legal involvement and include key stakeholders
  - Person responsible for area, e.g. the Registered Manager
  - A HS representative
  - BCI Legal Counsel
- b) Engage external legal support if determined as required
- c) Review legal risk and determine needs, communicating LPP process to investigation team prior to the commencement of investigation
- d) Allow adequate time before the start of the investigation to prepare LPP documentation

#### 4.2.6 Communication Matrix

The following notification process shall apply to relevant incidents as a minimum

Incident Type	Line Manager	Site HS	Register Manager	Dept. Executive	Corporate HS Manager	Head of People & Services	General Counsel	Managing Director
<b>Fatality</b>	Phone ASAP	Phone ASAP	Phone ASAP	Phone ASAP	Phone ASAP	Phone ASAP	Phone ASAP	Phone ASAP
<b>Potentially Fatal / Significant Incident</b>	Phone ASAP	Phone ASAP	Phone ASAP	Phone ASAP	Phone ASAP	INX notification	Email	Email
<b>Non work related Medical Evacuation</b>	Phone ASAP	Phone ASAP	Phone ASAP	Email	Email	Email for employee only		
<b>Industrial Disputes</b>	Phone	Phone	Phone	Phone business hours or email		Phone	Email	
<b>Other Injuries</b>	Phone within shift	Phone within shift	Phone within shift	Phone within shift	Phone within shift			
<b>Other events</b>	Phone within shift	Phone within shift	Email / INX notification	Email / INX notification	Email / INX notification			



## 4.3 Incident Classification

All incidents are classified based on their type of incident (injury, environment, equipment damaged etc), the severity of the damage and if the incident is work related or non-work related

Establishing work relatedness is required for all incidents. Incidents shall be reported, recorded, and appropriately classified, and determined whether an incident is work-related or non-work related.

Work-related incidents include those activities that are required to be carried out under the direct control of BCI and include activities performed by an BCI employee or contractor while performing their usual duties of employment and include; work related injuries, damage, production loss and non-conformances.

Incidents shall be classified in accordance with the incident classification definitions. More than one incident classification may be chosen, except for a near miss. The Incident Classification Matrix shall be utilised to ensure accurate classification of an injury or illness.

An incident is any unwanted event (incident) which is reportable to the BCI Minerals business. Incidents can include any of the following;

- Any Injury / Illness event
- Environmental incidents
- Community / Heritage loss or damage
- Equipment loss or damage
- Security related incidents (theft, assault, extortion etc.)
- Near Miss events

A potentially fatal incident or significant incident is any incident that had the potential to result in a fatality or permanent disabling injury

An injury is any wound or damage to the body resulting from an event in the work environment. Examples include (but are not limited to):

- Cut, puncture, laceration, abrasion, fracture, bruise, chipped tooth, amputation, electrocution and burns;
- Sprain and strain injuries to muscles, joints and tissues when they result from a slip, trip, fall or other similar accident.

Illnesses include both acute and chronic illnesses. Examples include (but are not limited to):

- Skin diseases or disorders caused by work exposure to chemicals, plants or other substances (e.g. contact dermatitis, eczema or rash caused by primary irritants and sensitizers);
- Respiratory conditions caused by work associated with breathing hazardous biological agents, chemicals, dust, gas vapours or fumes at work (e.g. silicosis, asbestosis and metal fume fever);
- Poisoning caused by work including disorders evidenced by abnormal concentrations of toxic substances in blood, tissue, bodily fluids or breath caused by the ingestion or absorption of toxic substances into the body. (e.g. poisoning by lead, mercury and gases.
- Noise induced hearing loss (as defined in OSHA);
- All other occupational illnesses including illnesses resulting from environmental heat and other effects of exposure to low temperatures (e.g. heatstroke and frostbite).

### 4.3.1 Counting days lost or restricted work days

- Do not include the day of the injury/illness;
- Record only rostered days as opposed to calendar days;
- Fatalities: Record as 220 days and stop counting;
- Stop counting lost or restricted days after 180 days;

- If the worker has left the company for reasons unrelated to the injury/illness, stop day count from the termination date;
- If the worker has left the company due to the injury/illness, continue to count days in accordance with usual roster, based on medical certification supplied by the insurer;
- If the worker has been transferred to new duties permanently, record as Restricted
- Work Injury or Illness, but stop the day count on the date when made permanent (subject to a minimum of one (1) day)

### 4.3.2 Injury Classification Matrix

Type	Guideline/Definition
<b>Work Related Injury / Illness</b>	<ul style="list-style-type: none"> <li>• A personal injury by incident arising out of or in the course of employment or whilst the worker is acting under the employer’s instructions.</li> <li>• An injury or illness where an event or exposure in the work environment caused or contributed to the condition or significantly aggravated a pre-existing condition.</li> <li>• A disease contracted in the course of employment at or away from place of employment and to which the employment was a contributing factor and contributed to a significant degree.</li> <li>• The recurrence, aggravation or acceleration of any pre-existing disease where the employment was a significant contributing factor (remains work related only until the recurrence, aggravation or acceleration resolves).</li> <li>• Specified industrial diseases.</li> </ul>
<b>Total Recordable Injuries / Illnesses</b>	<ul style="list-style-type: none"> <li>• Fatality</li> <li>• Lost time injury/illness</li> <li>• Restricted Work Injury/Illness</li> <li>• Medical Treatment Injury / illness</li> </ul>
<b>Lost time injury or illness</b>	<p>A Lost Time Injury/illness covers any work-related injury or occupational illness which resulted in the injured/ill person unable to perform regular duties for a complete shift or period of time after the injury/illness and as prescribed by a suitably qualified medical practitioner. An LTI is recorded even if the injured/ill person returned to work despite the medical practitioner recommending time away.</p> <p>A Lost Time Injury/Illness shall not be recorded for:</p> <ul style="list-style-type: none"> <li>• Time spent travelling or waiting for diagnosis following an incident (unless the injury/illness subsequently becomes classified as an LTI or RWI).</li> <li>• Fatalities.</li> </ul>
<b>Restricted duties injury or illness</b>	<p>A restricted work injury/illness results in a person being unable to perform the full scope of their own job and which results in them being given alternate or modified duties for at least a full scheduled shift following the injury.</p> <p>A restricted work injury/illness requires medical certification from a medical practitioner that specifies what the physical capabilities / restrictions are.</p> <p>A Restricted Work Injury/illness is an occupational injury or illness where, as a result of and based on medical certification, the employee is either:</p> <ul style="list-style-type: none"> <li>• Assigned to other duties on a precautionary basis for more than three consecutive shifts after the injury occurred; or</li> <li>• Assigned to other duties on a temporary basis; or</li> <li>• The employee worked at a permanent job less than full time; or</li> <li>• The employee worked at their permanent job but could not perform all the duties normally connected with it; or</li> <li>• The employee completes work normally despite a necessary restriction from the medical practitioner.</li> </ul>
<b>Precautionary Duties</b>	<p>A period of 72 hours from the time the work-related injury or illness being assessed, where medical assessment, signs and symptoms suggest the worker will generally manage normal duties if specific tasks are avoided to prevent further aggravation. Reviews must be completed every 12 hours.</p>

	<p>A certificate from a medical practitioner advising the individual is unable to undertake full normal duties shall be recorded as RWI</p>
<p><b>Medical treatment injury or illness</b></p>	<p>Medical treatment injury/illness includes cases where a person is injured at work or receives an occupational illness and is sent to a medical practitioner for medical treatment and is subsequently able to resume the full scope of their job without losing further time or being placed on restricted duties.</p> <p>The following are examples of what would generally be classified as Medical Treatment:</p> <ul style="list-style-type: none"> <li>• Use of prescription medication</li> <li>• Administration of a course of non-prescription medication at prescription strength as ordered by the treating physician;</li> <li>• Surgery;</li> <li>• Admission to hospital or medical facility to receive medical treatment;</li> <li>• Application of stitches/sutures;</li> <li>• Removal of a foreign body embedded in the eye by a medical practitioner (scrape);</li> <li>• Removal of a foreign body from a wound that requires a local or general anaesthetic;</li> <li>• Infection of a wound that requires oral or intravenous antibiotics;</li> <li>• Any treatment administered intravenously;</li> <li>• Dental treatment resulting from a work injury;</li> <li>• Physiotherapy, occupational therapy or chiropractic treatment for more than three consecutive shifts post injury;</li> <li>• Positive x-ray diagnosis</li> </ul> <p>People other than doctors may administer medical treatment. For example, closure of a wound by a first aid provider by suturing in the absence of a doctor, would constitute classification of that injury as a Medical Treatment Injury</p>
<p><b>First Aid injury or illness</b></p>	<p>A First Aid Injury/Illness is recorded when first aid treatment is required as a result of a work related injury or illness. Treatments listed here are to be reported as first aid regardless of the professional status of the person providing the treatment. First aid treatments include:</p> <ul style="list-style-type: none"> <li>• The administration of prescription only medications by a medical practitioner including: <ul style="list-style-type: none"> <li>○ Antibiotics to prevent infection;</li> <li>○ Anti-inflammatories for less than three consecutive shifts post injury;</li> </ul> </li> <li>• Analgesia for initial pain management (single dose) where no other medical treatment results;</li> <li>• Using a non-prescription medication at non-prescription strength;</li> <li>• Administering tetanus immunisations;</li> <li>• The conduct of diagnostic procedures, such as x-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes (e.g., eye drops to dilate pupils);</li> <li>• Cleaning, flushing or soaking wounds on the surface of the skin;</li> <li>• Using wound coverings such as bandages, Band-Aids, gauze pads etc.; or using butterfly bandages, Steri-Strips or non-prescription medical glue</li> <li>• Using hot or cold therapy;</li> <li>• Using any totally non-rigid means of support, such as elastic bandages, wraps, nonrigid back belts etc.</li> <li>• Using temporary immobilization devices while transporting an accident victim (e.g. splints, slings, neck collars, back boards etc.). Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;</li> <li>• Using eye patches;</li> <li>• Removing foreign bodies from the eye using only irrigation or a cotton / plastic tipped swab;</li> <li>• Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;</li> <li>• Using finger guards;</li> <li>• Using massages</li> </ul>

	<ul style="list-style-type: none"> <li>• Drinking fluids for relief of heat stress</li> </ul>
<b>Report only</b>	<p>Minor work-related injuries that do not require any treatment but are simply reported. These injuries will be recorded in the treatment book by the Treating Officer and within INX. Minor injuries include things such as:</p> <ul style="list-style-type: none"> <li>• Minor lacerations and other injuries not requiring any form of treatment.</li> <li>• Bruises that do not cause any significant discomfort or require any form of treatment.</li> </ul>
<b>Non work related Injury</b>	<p>The Non-Work Related (NWR) Injury classification relates to injuries that arise by accident which are not directly attributable to work activities, or a specific workplace. NB: This classification should always be reviewed considering any accepted workers' compensation claim. Each of the following shall be classified as Non-Work-Related Injuries:</p> <p><b>CAMP INJURY</b></p> <p>Any injury resulting from activities in a camp or voluntary funded extra-curricular activity which are unrelated to work activities, e.g. camp sports, gymnasium related, funded sporting injuries, etc.</p> <p>NB: Although not considered work-related for the purpose of this procedure, these injuries may still be compensable under the workers' compensation legislation.</p> <p><b>JOURNEY INJURY</b></p> <p>Any injury by accident arising out of, or during the course of a worker's employment, during a journey between a place of residence and the worker's place of employment (including the airport for FIFO workers); or where the journey is a substantial deviation or interruption of, a journey made for any reason unconnected with the worker's employment</p> <p><b>REPORT / ASSESSMENT ONLY (NON-WORK RELATED)</b></p> <p>Minor non-work-related injuries that do not require any treatment but are simply reported e.g. minor lacerations, bruises and other injuries that do not require treatment or cause any significant discomfort</p> <p><b>NON-SPECIFIC EVENT INJURY</b></p> <p>Any injury that occurs that is not associated with a specific workplace event, or that arises without a specific date or time of incident.</p> <p><b>Other Non-Work Related</b></p> <ul style="list-style-type: none"> <li>• Any injury that results solely from normal body movements (e.g. tying a shoelace, sneezing) provided the action does not involve a job related motion and the work environment does not contribute to the injury/illness.</li> <li>• Presenting with localised pain to a body part after waking up, treatment and reporting of injuries that have occurred whilst on rostered days off, personal medical conditions etc.</li> <li>• Any injury sustained in the workplace, when the worker was not engaged in any duty at work that could have placed stress on the affected body part or was not exposed to any chemical or physical agent that could be associated with the observed injury/illness.</li> <li>• Presenting with the common cold or flu.</li> <li>• Any injury or illness attributed to an event or activity not related to work or the work environment (e.g. person trips for no apparent reason while walking across a level workshop floor).</li> <li>• An injury occurring solely as a result of injured person eating, drinking, preparing food for personal consumption or personal grooming.</li> <li>• The person visiting the workplace as a 'member of the public'.</li> <li>• An injury sustained while the person was working from a home office but not engaged in work activities (e.g. domestic chores).</li> <li>• The signs/symptoms of an injury surface at work but result from a non-work related event or illness. NB: The work environment/task must have significantly aggravated a pre-existing injury or illness before the case becomes work related.</li> <li>• Symptoms predominantly attributed to a non work related illness or injury (e.g. dehydration attributed to an illness involving lack of food or fluid intake or vomiting and/or diarrhoea).</li> </ul>

## 5. INCIDENT INVESTIGATION

### 5.1 General Investigation Requirements

The investigation of incidents is a line responsibility, and all investigations shall be led by a line Supervisor or Manager with relevant investigation training. The Lead Investigator shall have adequate training and knowledge in investigation methodology relevant to the level of investigation required (e.g. ICAM or 5 Why).

Where there is no ICAM trained Lead Investigation, an alternative methodology may be applied. HS representatives and any relevant Subject Matter Experts (SME) shall provide support to or facilitate the investigation process.

All persons associated with, or witness to, an incident are required to participate constructively in the investigation and reporting process.

All incident investigations shall be documented on the Incident Investigation Report and key findings entered electronically.

BCI Minerals will investigate all incidents. Incident investigations shall:

- Be conducted by persons with the required level of knowledge and training, which may include the use of subject matter experts;
- Capture all relevant information regarding the incident including identifying the factors that lead to the incident or other system failure;
- Undertake root cause analysis to understand the fundamental cause of the incident;
- Recommend appropriate corrective actions to be taken; and
- Prompt a review of process and/or procedures.

Key steps include:

- Planning: Establishing an investigation team;
- Gathering data;
- Identifying contributing factors; and
- Identifying corrective actions.

The investigation process should commence no later than 24 hours after the incident being reported and be documented in the investigation report template.

For the purposes of determining severity and investigation level, each incident is classified based on actual and potential risk

- Actual risk - The outcome of that occurrence.
- Potential risk - The maximum reasonable potential consequence of any incident shall be determined by considering the effectiveness of existing controls.

Refer to the Severity Matrix in 4.4.2 of this procedure to determine level of investigation

### 5.1.1 Severity Matrix to determine level of Investigation

Investigation Type	Level	Score	Health & Safety	Environmental	Reputation	Compliance	Damage or Cost Impact	Works Interruption
ICAM	Severe	5	Fatality or TPD	Regional impact, loss of flora and fauna or loss of highly valued species.	Long term public condemnation, permanent brand damage.	Multiple major breaches of law resulting in executive imprisonment, loss of license to operate.	>\$10M	>1month
	Major	4	Lost time injury	Large impact, ability to rehabilitate.	Localised, long term impact, out of BCI control, serious brand damage.	Multiple significant breaches of law resulting in prosecution.	\$5M - \$10M	1 week – 1month
	Serious	3	Restricted duties injury or illness	Localised, regulatory breach. Significant clean up required	Localised, long term damage to brand but manageable.	Single significant breach of law resulting in prosecution. Failure to meet standard audit.	\$2.5M - \$5M	1 day – 1 week
5 WHYS	Medium	2	Medical treatment injury or illness	Localised, moderate clean up required.	Localised and short term.	Minor breach of law resulting in regulatory notice	\$1M - \$2.5M	8-24hrs
	Minor	1	Near miss / First Aid injury or illness	Localised, minor clean up required	Localised and temporary.	Single minor breach with Informal notice.	< \$1M	<8hrs
Report only	Insignificant	-	Injury or illness not needing first aid	Single on site event causing no harm	Informal complaint (rumour)		<10k	<1hr

## 5.2 Planning

The level of planning and depth / breadth of the investigation activities is variable depending on the seriousness or complexity of the event.

The seriousness of the event will in most cases naturally contain the investigation effort however, the investigator / investigation team will need to ensure their effort matches the level of control expected to be achieved from the investigation outcome (i.e. papercuts don't need extensive timeline or 5 Why).

Appoint the investigation team. This should be carried out promptly. It is important that the appointed team members have no biases and have sufficient experience and technical knowledge to carry out the investigation.

- For report only and minor level incidents an investigation a team is not required, nor is significant planning. Medium level incidents requiring 5 WHYS may on occasion require additional resources and a team approach.
- For all significant incidents or incidents determined as requiring ICAM investigations a team is required. Investigation planning steps follow on how to proceed.
- Conflict of interest – Depending on the nature / seriousness of the event the line management responsible for area/activity may be required to be isolated from the investigation process.
- On approval from the SSO/ Department Executive/ Corporate Safety, The line management responsible for the area of the incident may participate in the ICAM but may not lead the / facilitate the ICAM.

### 5.3 Data Collection – PEEPO ME

The third step of the Investigation process is to collect all relevant information that will help you in understanding the incident and the events leading up to it. It is highly likely that a lot of information will already have been collected. If this is the case, the team needs to categorise this information, highlight what is missing, and identify what else needs to be collected.

Data collected needs to be valid (and validated) and reliable.

- Valid evidence is that which is directly related to the investigation – provide some examples.
- Reliable evidence is that which would be exactly the same even if it was collected in another means (i.e. it is able to be proven).
- Items/ objects including documents may only be removed from the scene by authorisation of the lead investigator

Utilise the PEEPO process for identifying information that will assist in building your timeline and 5 WHYS, also consider Materials and Energy (PEEPO ME)

**People** You need to find out who was involved in the incident; who witnessed the incident; and gather all the available information from these people about things such as: People involved; Positions of injured workers; Presence and location of witnesses; Experience and training received; Physical limitations

Supervision; Rosters.

**Environment** You need to ask yourself ‘What environmental conditions were evident at the time of the incident?’ and collect information about things such as: Weather conditions; Time of the day; Housekeeping; Conditions such as noises and lighting; Dust; fumes; toxic substances; Photographs of the scene;

**Equipment** You need to find out if any equipment/materials contributed to the incident and collect information about things such as: Equipment involved/type of work being done/fit for purpose; Machine design/modifications; Maintenance history/inspections/defects/evidence of prior failures; Age/condition/safety systems/hazardous substances.

**Procedures** Collect information about things such as: Safe Operating Procedures – available/known/used?; Risk assessments (JHA); Material Safety Data Sheets (MSDSs); Permit to Work/Isolation/Tagging; Equipment manuals and procedures

**Organisation** Management has a responsibility to provide a safe workplace and this must also be considered during an investigation; you need to find information about such things as: Leadership/culture/monitoring;



Risk management system; Change management procedure; Organisation structure including Supervision; Communication; Consultation; Design; Maintenance programs

**For non-significant incidents** this can be a simple process using the PEEPO toolkit to make sure you have all the information you need. (make notes).

**For Significant incidents:** The planning starts off with a brainstorming exercise lead by the ICAM facilitator; all team members should be involved. As you collect information some things maybe added and others discarded as not relevant to the event.

A PEEPO chart is drawn up and data that needs to be collected or is already collected is written on 'sticky notes' and stuck in the relevant area of PEEPO. This technique allows easy rearrangement of the data.

**Delegate tasks;** Once the PEEPO Chart has been completed, data that has not yet been collected or information that requires further investigation must be prioritised and delegated as a task to the team. Some low priority data may not need to be collected. Tasks should be assigned in priority order and each should have a completion time/date. Tasks can be completed by individual team members or small groups.

**Regroup;** When all the data is collected, the team regroups and shares their findings. When the group believes they have collected all the relevant information, they are ready to start organising the data.

## 5.4 Data Organisation

During the data collection phase of the investigation, you should have collected as many relevant facts as possible. As a supervisor, what do you do with the data? How does it help? How many sources of information are enough? Which sources would you regard as 'stronger' evidence?

Organising the collected data allows complex information to be simplified and identifies the factors that really matter, as well as identifying and highlighting for relationships between the contributing factors. Organising the data will help you understand the incident and the events leading up to it, and help you identify contributing factors and underlying causes.

There are two key phases in organising data:

1. Constructing a timeline.
2. '5 whys' analysis (based on the timeline).

Timeline and 5 Whys can be built concurrently or consecutively (information identified by placing in timeline may effect 5 Why and vice versa) Doesn't need to be complicated but must be sequential and factual.

- For Significant incidents: Brainstorm with your investigation team using a whiteboard/ wall and sticky notes
- For Non-significant incidents use the PEEPO Excel template to organise the information you have collected.

### 5.4.1 Constructing a Timeline

A timeline is a concise and accurate description of an incident, in sequential order; it may go back many years. A timeline must be completed for all non-significant and significant investigations (not required for simple reports), as this is how you start your 5 WHY. The complexity and size of the timeline will depend on the incident.

A well-constructed timeline: Paints a 'word picture' of the sequence of events; Is the first step in the analysis process; Is the investigation's centrepiece from which critical information is identified and corrective actions



developed; Each step on the timeline must be supported by evidence gathered during the investigation; Identifies areas where more info is required; Leads to the next step – identifying contributing factors (A list of factors that contributed to the incident occurring)

1. Identify the main event (the incident)
2. Go back (pre-event) then forward (post event), identifying events in the sequence
3. For each event, detail relevant conditions at the time and date of that event
4. Mark any events that need more investigation

Validate your data (This step is extremely important to ensure the Team’s findings are accurate and credible)

#### 5.4.2 5 WHYS

There are often a number of reasons why a person did or did not do something – the challenge is in digging deep enough to truly get to the bottom of the issue. The answers to these questions are also much easier to correct than ‘worker carelessness’.

The ‘5 whys’ process is applied to the timeline. It consists of a structured discussion to identify the contributing factors and underlying causes. The process is: For each key event (not all events) in the timeline, ask the question ‘Why?’ Continue to ask ‘Why?’ from the preceding response until the question cannot be answered

Start with the first step in the sequence of events (Timeline);

1. Ask: ‘Did something in this step contribute to the incident?’  
(Yes = contributing factor; No = non contributing factor).
2. If ‘Yes’, ask ‘why’ the event happened; write the answer below the event.
3. If the answer doesn’t identify the underlying cause, ask ‘why’ again and write that answer down.
4. Does not have to be ‘5 Whys’ – sometimes an event does not need a ‘why’
5. Repeat steps 3 and 4 until you identify the underlying cause (5 ‘whys’ is a guide).
6. When why can no longer be answered you have reached:
  - A control point (Organisational Factor)
  - A point that is beyond organisational control
  - A point where more data needs to be collected to answer why
7. Continue to the next step in the sequence of events.

#### 5.4.3 ICAM Analysis

Similar to Hierarchy of control, where Elimination, Isolation, substitution and engineering are the most effective methods of preventing an incident reoccurrence. Organisational factors and absent / failed defences are the categories where focussing improvements will have the most impact.

The ICAM process enables us to look beyond the intentional or unintentional actions and develop methods to trap (place barriers before) errors, violations and failures to prevent them reaching the lowest common denominator, where there is the greatest amount of variability.

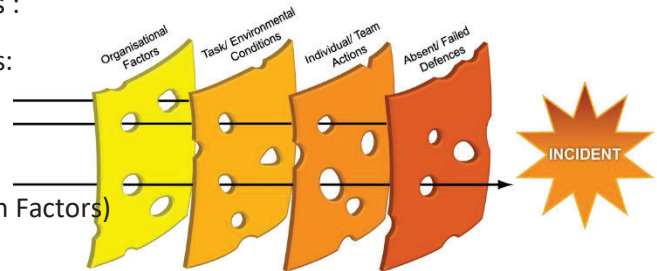
In the first stage of the analysis the objective is to extract each piece of factual information from the investigation findings or draft incident report, and to classify them into one of the five contributing levels. Some things will just be facts and will not be contributory to the event.

As you proceed continually ask why and the gaps will eventually be filled. Resist the temptation to speculate at this stage.

Using data from the Timeline and 5 Whys, and the provided check questions on the following slides, classify the incident findings and identify the contributing levels :

➤ The non contributing facts And the Four Categories:

1. The absent/failed defences
2. The individual/team actions
3. The task/environmental conditions (work & Human Factors)
4. The organisational factors & type



The four ICAM categories are further divided into subcategories and within each subcategory there is a numbered list of factors. This information is contained in a chart called the ICAM Categories and Factors Chart. (Refer Quick References).

The ICAM Categories and Factors Chart is a key document to use during the ICAM analysis as it provides the coding system that you need to use in the final report in INX. It an invaluable guide when analysing and classifying the data. The codes are not meant to be checklists but are valuable for data entry and trend analysis. Refer to the PEEPO 5 WHY and ICAM template

### 1) Absent or Failed Defences

- Factors that result from inadequate or absent defences that failed to detect and protect against technical and human failures
- Last minute measures that did not prevent the outcome of the incident or mitigate/reduce its consequences
- A 'defence' is a form of protection against hazards. For example, warning lights, guards, and emergency exits.
- An 'absent' defence refers to a control that was not put in place.
- A 'failed' defence refers to a control that was in place, but did not provide the required protection.

### 2) Individual / Team Actions

- Errors or violations carried out by either individuals or a team that led directly to the incident
- Typically associated with people having direct contact with equipment or material
- Always committed 'actively' (someone did or didn't do something)

#### Human Error Types

1. **Slips** – errors that occur which the right intention or plan is incorrectly carried out. These usually occur during well-practiced and familiar tasks in which action are largely automatic.
2. **Lapses** – failures to carry out an action. Lapses typically involve failures of memory
3. **Mistakes** – involve deficiencies or failures in the judgement process. These occur when rules are applied incorrectly or knowledge relevant to the situation is inadequate, and a flawed plan is developed. When carried out, the plan will not lead to the desired outcome.
4. **Violations** – deliberate deviations from safe operating practices, procedures, standards or rules. These can be further categorised as:
  - Routine (the breach of rules or corner cutting has become implicitly accepted, and a normal activity)
  - Exceptional (one off violation enacted in unusual circumstances)
  - Acts of sabotage (deliberate action intended to cause damage)

### 3) Task/ Environmental Conditions (Work Environment & Human Factors)

Describe something about the:

- task demands
- work environment
- individual capabilities, or
- human factors

That promoted errors and/or violations, or that undermined the effectiveness of system defences? Examples may include noise, dust, fatigue, time pressure, complacency etc. For example:

- There was a lot of dust present in the atmosphere
- Housekeeping in the area was poor
- There were time restraints due to the shutdown
- He was known as a reckless driver; his nickname was 'Speedy'

### 4) Organisational Factors

The next step of the analysis is to identify which of the organisational factor types are primarily implicated in producing the identified task/environmental conditions, allowed them to go unaddressed or undermined the systems defences. These may include management decisions, processes and practices

Identify the presence of a standard Organisational Factor before the incident, which:

- produced adverse task/ environmental conditions, or allowed them to go unaddressed?
- promoted or passively tolerated errors or violations?
- undermined or removed the system defences?

Examples:

- The organisation did not provide induction training
- The organisation did not have up-to-date procedures
- The organisation did not enforce routine maintenance schedules

## 5.5 Just Culture

Just Culture is a concept related to systems thinking which emphasizes that mistakes are generally a product of faulty organizational cultures, rather than solely brought about by the person or persons directly involved. In a just culture, after an incident, the question asked is, "What went wrong?" rather than "Who caused the problem?".

A just culture helps create an environment where individuals feel free to report errors and help the organization to learn from mistakes. This is in contrast to a "blame culture" where individual persons are fired, fined, or otherwise punished for making mistakes, but where the root causes leading to the error are not investigated and corrected. In a blame culture mistakes may be not reported but rather hidden, leading ultimately to diminished organizational outcomes.

In a system of just culture, discipline is linked to inappropriate behaviour, rather than harm. This allows for individual accountability and promotes a learning organization culture.

In this system, honest human mistakes are seen as a learning opportunity for the organization and its employees. The individual who made the mistake may be offered additional training and coaching. However, wilful misconduct may result in disciplinary action such as termination of employment—even if no harm was caused.

## 5.6 Investigation Outcomes – Corrective and/or Preventative Actions

A key part of an incident investigation is to use the data you've collected and analysed to determine why the event happened and to stop it from happening again. One of the primary reasons for conducting incident investigations is to prevent a recurrence. It is critical for the investigation team to recommend corrective actions that directly address the underlying causes.

Actions resulting from an incident investigation may be:

1. **Preventive** – actions to stop something from happening.
2. **Corrective** – actions to correct something that was absent, went wrong/failed, or did not work.

The lead investigator shall ensure all actions arising from the incident investigations are discussed with the person being assigned the action before assigning them in INX. **Speaking to the person you're assigning actions to first, is not only polite but it prevents actions from becoming rejected or overdue because**

- the person couldn't do them in the timeframe,
- the person is the wrong person to do the job
- the person is going on leave
- the action is simply not appropriate.

When making recommendations, you need to use the hierarchy of controls with the objective of eliminating or substituting the hazard via engineering fixes or similar. However, short-term administrative or PPE controls may be considered as 'stop gap' measures until the longer-term fix is implemented. Ensure actions do not weaken existing defences or introduce new hazards, check;

- Risk assessment
- Safety in Design
- Trial/ test before implementing wholesale changes
- Management of change

If you follow these guidelines, you will create SMARTA recommendations; that is, they will be: **Specific, Measurable, Achievable, Realistic, Timely, Agreed**

- Start with an action word.
- State precisely what has to be done (don't try to save the world).
- Have only one task to be completed within each recommendation.
- Write down the department responsible for the action.
- Write down the name of the person responsible for the action.
- Record the date on which the action will be closed out.

It is important to note that the investigation team only makes recommendations. These recommendations only become corrective/preventative actions when management has endorsed them and assigned resources, responsibilities, and time frames. The Manger shall:

- Ensure the recommended remedial measures and corrective actions are implemented as soon as practicable following the conclusion of the investigation; and
- Ensure that all lessons learned are communicated throughout the organisation;

## 5.7 Record and Report the Findings

Timeline and information, timely reporting for timely actions to prevent reoccurrence

- Initial report entered into INX within 24hrs of incident occurring
- Investigate and close out the event in INX within 14 days
- Attach all data collected for the event in INX as a formal record of the investigation:
  - Photos
  - Statements
  - Diagrams
  - Timeline and '5 whys'

Injury Classification completed and checked by HS personnel only. Descriptions in incidents can lead to confusion for personnel who are not familiar with the site/ type of work/ location or technical information. Therefore it is important to ensure information is simple or explained;

- Avoid using acronyms, where necessary - use the expanded version with the acronym in brackets the first use in the document
- Use plain English – no complex terms where possible
- Provide definitions for technical or equipment terms as required
- Do not use personnel names in the incident description
- Include photographs that provide context (taken from a distance not just close ups)
- Include diagrams if required

**Complete all fields.** Be as specific as possible. Obviously the greater the information provided in INX, the better the feedback provided with trends and analysis for discussion with relevant personnel on site. If “other” is selected for everything, the information provided will mean nothing.

Ensure the **risk ranking** of the event matches the **potential** severity – does the ranking (e.g., High 16) match the severity (e.g., of first aid case)? Obviously, you can't have a potential High-Level event that only has potential for a first aid injury.

**Key learnings** are things that people show know or could learn from the incident. Use the contributing factors identified in 5 whys to identify the underlying factors and key learnings – You can have more than one.

**Add actions** – remember the SMARTA principle. Always contact the person you are going to send an action to make sure they are the right person to send it to – and to make sure the due date is appropriate. This will ensure they don't reject it and you end up with an overdue action to explain to management.

**Add your attachments** – In attachments and comments there is a drop-down box that allows you to select “file” then simply go through the process as if attaching something to an email.

**Incident close out** - It is important to review the entire incident to ensure all fields have been completed, risk ratings are adequate and other information such as injury classifications have been entered. Also ensure that you include a comment prior to signing off.

## 5.8 Monitor, Review and Close Out

- All incidents and assigned corrective actions shall be managed by the electronic registers and closed out within a suitable time frame that is agreed by all key stakeholders. Incidents and actions unable to be closed out within the agreed timeframe shall be monitored monthly.
- Events representing the greatest health and safety risk shall be given priority when undertaking corrective actions.
- Executive Manager shall review level 4 and 5 events and corrective actions monthly for risk control effectiveness.

## 6. COMMUNICATION OF INCIDENTS AND LESSONS LEARNT

It is essential that the workforce is briefed and understands the learnings from all incidents and investigations. Managers shall ensure that Supervisors present information regarding incidents through an appropriate forum (e.g. pre-start meetings, toolbox meetings, organised stop work meetings, notice boards and alerts or bulletins). These briefings shall outline the known facts without attributing blame, and provide information about any preventative actions undertaken, changes to procedures, and lessons learned.

Lessons learned and changes to operating practices or procedures that arise from each incident investigation shall be communicated to site personnel via safety meetings, pre-start meetings and/or toolbox meetings. Using the following templates

- Event Share (minor and moderate severity incidents)
- PFI SPI TRI Review (Potentially Fatal, Significant Potential, Total Recordable Injury)
- Industry Event Share (external incident share – ensure relevance is identified)
- Improvement share (improvements, innovations and learnings not arising from incidents)

For PFI/SPI/ TRI, an additional HS meeting with executives should be convened to ensure these lessons learned are communicated efficiently and effectively. In these meetings Improvement shares should also be included to maintain balance and celebrate success.

All incidents and investigative outcomes shall be reviewed by management and Health and Safety Representatives on a regular basis.

## 7. DEFINITIONS & REFERENCES

Term	Definition
Reportable Incident	Is any incident or unwanted event which is reportable to the BCI Minerals business and loaded into the online database
Notifiable Incident	Is any incident or unwanted event which is reportable to a regulatory department (DMIRS, WorkSafe, AMSA)
Recordable Injury	Any actual workplace injury which results in a Fatality, Lost Time Injury (LTI), Restricted Work Injury (RWI) or Medically Treated Injury (MTI).
Incident Classification	The classification of all incidents by Impact Type and Consequence Level
Injury and Illness	Any occupational injury or illness which results from a work-related event.
BCI Minerals	Means BCI Minerals, principle to the projects on which it operates

Term	Definition
Legal Privilege	Is a rule of law protecting communications between legal practitioners and their clients from disclosure under compulsion of court or statute
Legal Counsel	This refers to the BCI Minerals Legal department
S.M.A.R.T. Methodology	<ul style="list-style-type: none"> <li>• Specific – target a specific area for improvement.</li> <li>• Measurable – quantify or at least suggest an indicator of progress.</li> <li>• Assignable – specify who will do it.</li> <li>• Realistic – state what results can realistically be achieved, given available resources.</li> <li>• Time-related – specify when the result(s) can be achieved.</li> </ul>
Therapeutic treatment	Successful prevention, diagnosis and treatment of a physical and mental illness, improvement of symptoms of illness' as well as beneficial alternation or regulation of the physical or mental status of the body.
Palliative treatment	Remedy that alleviates pains or the symptoms of diseases or disorder without affecting a cure or treating the injury.

ICAM Methodology
Emergency Management Plan



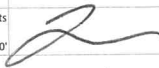
Abbreviation	Term
ICAM	Incident Cause Analysis Method
LTI	Lost Time Injury
MTI	Medical Treated Injury
RWI	Restricted Work Injury
FAI	First Aid Injury
HS	Health and Safety
HCE	Health Case Event
NWR	Non-Work Related
DMIRS	Department of Mines, Industry Regulation and Safety
SMART	Smart, measurable, assignable, realistic and timeframe
SRS	Safety Regulation System (DMIRS)
SPI / SI	<ul style="list-style-type: none"> <li>• Significant Potential Incident / Significant Incident</li> </ul>
MD	Managing Director
MSIA	Mines Safety and Inspection Act 1994 (WA)
MSIR	Mines Safety and Inspection Regulation 1995 (WA)
PFI	Potentially Fatal Incident
TRI	Total Recordable Injury (= Medical Treatment + Restricted Work + Lost Time Injury)

12.6 Appendix F - Aboriginal Heritage Management Guidelines for Contractors



# MARDIE SALT AND POTASH PROJECT

## ABORIGINAL HERITAGE MANAGEMENT GUIDELINE FOR CONTRACTORS

					
			<small>L. Smithers 2021.10.15 13:47:35 +08'00'</small>	<small>David Sourbutts 2021.10.15 14:44:27 +08'00'</small>	
1	12 Oct 2021	Re-Numbering Doc	L Smithers	D Sourbutts	A Glover
0	10 Jun 2021	Issued for Use	L Smithers	D Sourbutts	A Glover
Revision	Date	Description	Author	Checker	Approver
<b>Document Number</b>		<b>MAR-PRJ-CPR-005</b>			<b>Total Pages: 5</b>

*Previously issued as MAR-0000-EV-GDL-EGM-020-0002*

## Table of Contents

<b>1. Purpose and Scope .....</b>	<b>1</b>
<b>2. Definitions.....</b>	<b>1</b>
<b>3. Specification Requirements.....</b>	<b>1</b>
3.1 Potential Impact to Aboriginal Heritage Sites.....	1
3.2 Aboriginal Heritage Management Requirement .....	1
3.2.1 Conducting Ground Disturbing Works.....	2
3.2.2 Demarcation of Aboriginal Heritage Avoidance Sites.....	2
3.2.3 Training and Inductions .....	3
3.2.4 Aboriginal Heritage Incident Management .....	3
3.3 Monitoring and Reporting Requirements.....	3
<b>4. References.....</b>	<b>3</b>

## 1. PURPOSE AND SCOPE

The purpose of this guideline is to outline requirements for employees and Contractors in relation to the procedures to be followed for Aboriginal heritage management and compliance.

## 2. DEFINITIONS

Term	Definition
Aboriginal heritage site	A site that is surveyed and verified as being important to Aboriginal culture
Company	BCI Minerals Limited
Contractor	Organisation engaged under contract by the Company
GDP	Ground Disturbance Permit
Ground Disturbance	Any activity having an impact on the ground surface
Ground Disturbance Permit	A permit issued by the Company authorising ground disturbing works

## 3. SPECIFICATION REQUIREMENTS

Every Company employee and Contractor is required to exercise due care and to comply with all permits and licences when conducting work to minimise the risk of impacting upon Aboriginal heritage sites.

### 3.1 Potential Impact to Aboriginal Heritage Sites

Activities that involve large scale disturbances of land have a high potential to impact on Aboriginal heritage sites. Potential impacts may include:

- physical damage to Aboriginal archaeological and ethnographic sites;
- damage to sites caused by vibration related to drill and blast activities;
- discarding of litter and debris, in or near Aboriginal heritage sites;
- defacing or vandalism of objects forming part of Aboriginal heritage sites;
- removal of artefacts or objects from Aboriginal heritage sites;
- unauthorised photography or video of Aboriginal heritage sites;
- altering of demarcated boundaries of identified Aboriginal heritage sites; and
- impacts to site from releasing of large volumes of pump test water.

### 3.2 Aboriginal Heritage Management Requirement

The following requirements apply to all aspects of Aboriginal heritage management:

- All Company personnel and Contractors will complete a site induction which includes a topic on heritage.
- There will be no ground disturbing activities without a compliant Ground Disturbance Permit (GDP) (BCI-SUS-FM-001).

- The GDP will incorporate knowledge of previous Aboriginal heritage surveys and the identification of avoidance sites within or adjacent to the proposed work area.
- All reasonable precautions will be taken to protect Aboriginal heritage sites from damage caused by construction, operation and associated activities.
- Representatives of the relevant Native Title Group will be engaged to monitor construction work, as required.

### 3.2.1 Conducting Ground Disturbing Works

The requirements for Aboriginal heritage management during ground disturbing works are as follows:

- Prior to the commencement of any ground disturbing work a compliant GDP will be in place.
- Employees and Contractors will not enter or allow the ground to be disturbed within Aboriginal heritage sites.
- If the employee / Contractor identifies anything suspected as having Aboriginal heritage value, they will:
  - cease all work in the area,
  - mark the area with pink and black heritage tape or bunting, and
  - inform the immediate supervisor who will notify the RM.
- If the employee / Contractor identifies suspected human skeletal remains, they will:
  - cease all work in the area,
  - mark the area with pink and black heritage tape or bunting,
  - inform the immediate supervisor who will notify the RM, and
  - the RM will ensure that the Police Service is notified as soon as possible.
- The Company will advise of any further action required following the cessation of work in an area due to the discovery of any Aboriginal heritage artefacts or skeletal remains.
- Aboriginal heritage avoidance sites indicated on the GDP will be demarcated as specified in Section 3.2.2 of this Guideline.
- Any impact to a known Aboriginal heritage site will be reported immediately to the RM and an incident report lodged through the incident reporting system in accordance with the Incident Reporting and Management Procedure (BCI-WHS-PR-009).
- Contractors engaged to undertake blasting activities within 100 metres of any Aboriginal heritage site will, prior to the commencement of blasting works, submit to the Company a blasting procedure for review and comment.

### 3.2.2 Demarcation of Aboriginal Heritage Avoidance Sites

Aboriginal heritage sites shown on GDPs will be marked in the following way:

- Where the Aboriginal heritage site is within GDP boundaries or located within 10 metres of a GDP boundary, subject to any additional or different requirements in the GDP, the site will be marked with star pickets with continuous orange bunting and pink and black striped flagging tape attached.
- Where the Aboriginal heritage site is more than 10 metres outside the GDP boundary, the site will be marked with pink and black flagging tape only.

As Aboriginal heritage sites that are not within or adjacent to works areas will not always be flagged, off-road driving and access to areas outside of approved GDP areas is not permitted.

### 3.2.3 Training and Inductions

The Company will ensure that all employees and Contractors are aware of their responsibilities to protect Aboriginal heritage sites within and adjacent to Project construction areas through the heritage topic in the site induction.

### 3.2.4 Aboriginal Heritage Incident Management

Any impact to an Aboriginal heritage site will be recorded as an incident, and the Incident Reporting and Management Procedure (BCI-WHS-PR-009) will be followed.

Incident reporting, investigations and corrective actions will be managed via the Incident Reporting and Management Procedure (BCI-WHS-PR-009).

Any unauthorised impact to an Aboriginal heritage site will be reported externally by the Company to the Department of Aboriginal Affairs and may lead to penalties being applied under the Aboriginal Heritage Act 1972.

## 3.3 Monitoring and Reporting Requirements

All work conducted in relation to a GDP will be monitored by the Company and Contractor to ensure that GDP boundaries and Aboriginal heritage sites are not breached.

## 4. REFERENCES

Document Number	Description
BCI-WHS-PR-009	Incident Reporting and Management Procedure
BCI-SUS-FM-001	Ground Disturbance Permit
	Aboriginal Heritage Act 1972