



Ground Disturbance Permit Procedure

All Sites

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Authorisation

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1 Introduction

Ground disturbance is any disturbance of ground or change in land use. This can be to allow for the development of specific works (roads, buildings, workshops etc.) or access to a specific resource (mining pit, borrow pit, groundwater bore), including but not limited to clearing of native vegetation, driving off tracks, earthworks/excavations, geotechnical investigations and drilling. It also includes disturbance of previously rehabilitated areas.

Without the appropriate regulatory approval, it is unlawful to:

- Clear native vegetation
- Impact conservation significant flora and fauna and/or their habitat
- Disturb watercourses
- Disturb Aboriginal heritage sites
- Undertake mining related activities beyond the limits of approval

Atlas ensures all necessary environment and heritage approvals have been obtained prior to any ground disturbance. To ensure all conditions of these approvals are adhered to and impacts to the environment are minimised, all ground disturbance or changes in land use must be undertaken in accordance with this Ground Disturbance Permit (GDP) Procedure.

2 Purpose

The purpose of this procedure is to ensure all ground disturbance is undertaken in compliance with Atlas' standards and regulatory requirements, including but not limited to:

- *Mining Act 1978*
- *Environmental Protection Act 1986 (EP Act)*
- *Environmental Protection (Clearing of Native Vegetation) Regulations 2004*
- *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) (Commonwealth)*
- *Biodiversity Conservation Act 2016 (BC Act)*
- *Aboriginal Heritage Act 1972 (AH Act) and Aboriginal Cultural Heritage Act 2021 (ACH Act)*
- *Rights in Water and Irrigation Act 1914 (RIWI Act)*
- *Native Title Act 1993 (NT Act)*

3 Scope

This procedure applies to all Atlas controlled sites and their activities, employees, contractors and visitors, and is subject to the requirements of the Atlas Health, Safety and Environment (HSE) Standards and applicable environmental legislation.



4 Definitions

Table 1: Definitions

Term	Definition
Atlas	Atlas Iron Pty Ltd
Clearing	As defined in section 51A of the EP Act, clearing means: (a) the killing or destruction of; or (b) the removal of; or (c) the severing or ringbarking of trunks or stems of; or (d) the doing of any other substantial damage to, some or all of the native vegetation in an area, and includes the draining or flooding of land, the burning of vegetation, the grazing of stock, or any other act or activity, that causes — (e) the killing or destruction of; or (f) the severing of trunks or stems of; or (g) any other substantial damage to, some or all of the native vegetation in an area.
Change in land use	Change from one previously disturbed land use to another such as a change from a borrow pit to workshop.
GDP number	A unique identifier assigned to a GDP by the GDP Coordinator at registration and used through to assessment and close out.
Ground disturbance	Any change in land use or disturbance of ground including (but not limited to): clearing of vegetation, clearing of regrowth, driving off tracks, excavations, geotechnical investigations, drilling, installation of buildings, construction of roads, disturbance of rehabilitated areas.
Grubbing	Removal of stumps, roots and vegetation matter from the ground surface.
InControl-INX	Atlas' Incident reporting system.
Mark-out	The physical marking of one or more georeferenced points related to a boundary on-ground.
MRF	Mining Rehabilitation Fund – a pooled fund to which WA mining operators contribute to rehabilitate abandoned mines across the State.
Native vegetation	As defined in sections 3(1) and 51A of the EP Act and Regulations, native vegetation means indigenous aquatic or terrestrial vegetation, and includes dead vegetation unless that dead vegetation is of a class declared by regulation to be excluded from this definition but does not include vegetation in a plantation (unless planted as required under this Act or another law, e.g., rehabilitation).
Pick-up	The surveying and capturing of spatial data relating to an on-ground boundary or area, e.g. an area that has been disturbed
Shall	Mandatory.
Should	Highly desirable but not mandatory.
Topsoil	The upper 200 mm of the soil profile.



5 Responsibilities

Table 2: Roles and Responsibilities

Roles	Responsibilities
GDP Applicant – person/contractor proposing to undertake ground disturbance activities.	- Providing the necessary details to the GDP Owner to support completion of the GDP Application Form (950-EN-FRM-0003). - Responsible for all activities related to the GDP and must ensure that they themselves and the GDP operator(s) understand and comply with all conditions of the GDP. - Immediately notifying the GDP Owner and GDP Coordinator of any non-compliance.
GDP Owner – Atlas representative overseeing the proposed ground disturbance activity. <u>Note:</u> A contractor cannot be the GDP Owner. <u>Note:</u> An Atlas employee may be both GDP Applicant and GDP Owner.	- Accountable for all activity related to the approved GDP. - Submit a Ground Disturbance Permit Application Form (950-EN-FRM-0003) in accordance with this procedure, at least seven days ahead of any ground disturbance taking place and with sufficient time for GDP boundary mark-out to be completed. - Ensure adequate time has been allocated to complete all necessary mark out of GDP boundaries and significant sites on approval on GDP and prior to ground disturbance commencing. - Ensure the GDP application area is suitable to achieve intended works and provides enough flexibility to limit the potential requirement for amendment. - Ensure all conditions stipulated on the GDP are understood and adhered to. - Ensure the GDP is distributed and conditions communicated to all stakeholders working under the GDP. - Close-out the GDP within 30 days of completion of activity/works and prior to GDP expiry, including arranging GDP disturbance pick-up. - Apply for any GDP amendments, including time extensions, ahead of GDP expiry. - Ownership and close-out of any non-compliance against the GDP.
GDP Coordinator – Atlas representative	- Register and coordinate assessment of all new GDP applications. This includes maintaining the GDP register (950-EN-REG-0002), and seeking input from the relevant environment, heritage and land access and tenure stakeholders in the assessment of the GDP application. - Ensure all approved GDPs are signed by the relevant parties and saved to the server (950-EN-REG-0002 Ground Disturbance Permit Register). - Ensure all GDPs have been closed out prior to expiry. - Educate and increase awareness of this procedure with all employees and contractors. - Investigate any GDP non-compliance.
GIS Specialist – Atlas representative	Facilitate map creation and disturbance data management.

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Roles	Responsibilities
GDP Assessment Stakeholders – Atlas environment, heritage, land access and tenure representatives	• Determine whether all relevant approvals for the GDP application area are held. • Determine if the proposed activity is acceptable and compliant with all relevant approvals and Atlas HSE standards and procedures. • Document any conditions/compliance requirements that need to be adhered to during ground disturbance (Section 2 of the draft GDP), and where there are no conditions required 'N/A' shall be entered in the appropriate field. • Identify relevant external stakeholder notifications and permissions.
Surveyor (or approved exploration personnel) – may be Atlas or a contractor survey representative	• Mark out the GDP boundary and any avoidance/exclusion areas prior to GDP execution/ground disturbance commencing. • Pick up the area of actual disturbance under the GDP on completion of the activity and supplying this data to the GDP Owner and GDP Coordinator. Disturbance shall be picked up within 30 days and data provided to the GIS Specialist by the end of each month. • Notify the GDP Owner and GDP Coordinator of any potential or detected GDP breaches. • For all exploration activities, the GDP owner is responsible for ensuring set out and pickup is conducted by suitably trained Atlas Iron representative using a DGPS. Where a base station is not available to support DGPS, mark-out and pick-up can be done using a hand-held GPS. However, an additional 10 m buffer will be applied to any sensitive values to account for the device's inaccuracy. Where proposed works occur within this buffer, the GDP Owner will have to arrange a surveyor for more accurate mark-out.
GDP Operator – person directly undertaking the ground disturbance activities (may also be the GDP Applicant)	• Understand and comply with all conditions of the approved GDP. • Ensure they have a copy of the GDP (and associated maps) on them at all times while undertaking the activity. • Ensure they have a handheld GPS loaded with the relevant GDP data when machine control is not fitted to the machine. • Do not work outside the approved GDP area. • Stop work immediately and notify GDP Applicant/Owner where the work cannot be completed in accordance with the GDP (or if they have any uncertainty with regard to the works). Works cannot recommence until which time the GDP owner has sought, obtained and supplied the GDP Operator with an amended GDP.
Environmental Advisor (or approved exploration personnel) – Atlas representative	• Review and assess GDP applications, where they are the nominated GDP Assessment Stakeholder. • Ensure significant sites relevant to the GDP application have been demarcated in accordance with the Significant Site Demarcation Standard (950-EN-STA-0002) and Significant Sites Demarcation Procedure (950-EN-PRO-0018) prior to disturbance commencing. • Undertake regular inspections during ground disturbance when required to ensure compliance with conditions of the GDP (e.g., sufficient depth of topsoil / subsoil is being recovered) and document any non-compliance. • Investigate GDP breaches/non-compliances if and when they occur.
All Atlas Iron Managers, Project Managers and Superintendents	• Ensure that all personnel and contractors are aware of, have access to, and comply with this procedure.

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Roles	Responsibilities
All employees, contractors and visitors	- Adhere to this procedure and any advice/instruction issued to them from the Environmental Advisor (or nominated responsible person). - Report all incidents and non-compliances with this procedure to your Supervisor as soon as possible.

6 Process

Table 3: GDP Process



GDP Owner:

- Complete a GDP Application Form (950-EN-FRM-0003)**, in consultation with **GDP Applicant**.
 - It is the **GDP Owner's** responsibility to ensure the form is completed correctly and clearly to ensure the application is not delayed or rejected.
 - When creating the GDP boundary, consider and include as needed:
 - access to the GDP area
 - temporary construction/laydown areas
 - allowance for topsoil and vegetation stockpiles
 - windrowing requirements (where permitted)
 - locating all works within approval and site boundaries
 - avoiding known exclusion areas and sensitive environmental and/or heritage values
 - flexibility to allow minor design alterations without seeking GDP amendment
- Submit the GDP Application Form (950-EN-FRM-0003)** via email to GroundDisturbance@atlasiron.com.au. All applications shall be submitted with required attachments, including map(s), spatial data in shapefile or GPX format and any approvals (e.g., POW). Applications sent to any other address may not be processed.

Note: GDP applications should be submitted at least 7 days prior to proposed activity. A suitable window for GDP boundary mark-out and demarcation prior to disturbance should also be factored into application timeframes.



GDP Assessment

GDP Coordinator:

3. **Enter the GDP application into the GDP Register** (950-EN-REG-0002) and assign unique GDP number (assigned consecutively, with three-digit site/project reference e.g., GDP-MIR-001). If a GDP application is cancelled, reasoning should be recorded in the register and the number should not be reallocated.
4. **Prepare a draft GDP** using the Ground Disturbance Permit template (950-EN-TEM-0001).
5. **Coordinate the assessment** including seeking clarification from the **GDP Owner** if required, and seeking input and compiling comments from relevant **GDP Assessment Stakeholders**, who are to complete the relevant context specific condition parts of Section 2 of the draft GDP.
 - If during the assessment process, it is determined the works cannot proceed as proposed, discussions shall be held with the **GDP Owner** and/or **GDP Applicant** to provide reasoning, and to amend the GDP application where possible.
6. **Issue the GDP** to the **GDP Owner** and save signed GDP copy to the server. Ensure all data files issued to relevant stakeholders are in the correct format (GPX) for field use, for example GDP boundaries, heritage sites, fauna/flora areas.

GDP Owner and GDP Applicant:

7. **Review and sign Section 3 of the GDP (Permit Acceptance)** acknowledging that you have read and understand all of the conditions of the GDP. The GDP is not considered to be approved/valid until Section 3 has been signed and returned to the **GDP Coordinator**.

Mark-out and Spatial Data Upload

Surveyor (or approved Exploration personnel):

8. **Mark-out the approved GDP boundary** and demarcate any avoidance/exclusion areas and/or significant sites in accordance with permit conditions and as directed by the **GDP Owner**. For exploration projects where mark-out of certain sections of the GDP boundary is considered impractical or unsafe (due to topography or large distances), the mark-out of the GDP boundary may be reduced to only apply to sections where proposed disturbance falls within 50m of the GDP boundary. Any such exemptions must be assessed and approved by the Environmental Advisor prior to ground disturbance commencing. All other demarcation requirements (i.e. for significant heritage, flora, and fauna sites) still apply in the event a GDP boundary mark-out exemption is sought.
9. **Ensure the GDP Owner has been provided relevant, accurate spatial data** associated with the GDP (GDP boundary, design files, topsoil locations and significant site boundaries).
10. **Complete/sign Section 4.1** and return to **GDP Owner**.

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Significant Site Demarcation

Environmental Advisor (or approved Exploration personnel):

11. **Ensure demarcation of all avoidance/exclusion areas and/or significant sites relevant to the GDP has been completed** in accordance with the Significant Site Demarcation Standard, Significant Sites Demarcation Procedure, and permit conditions; and prior to ground disturbance occurring.
12. **Update the Significant Site Register** with all relevant details.
13. **Complete/sign Section 4.2** and return to **GDP Owner**.

Ground Disturbance Works

GDP Operator(s):

14. **Review all GDP conditions and sign Section 4.3 of the GDP** acknowledging that you have read, understood and will comply with all of the conditions of the GDP, and provide a copy to the **GDP Owner** and **GDP Applicant** prior to undertaking the activity.
15. **Undertake all activities in accordance with approved/final GDP.**
 - Only conduct work if a handheld GPS loaded with the relevant GDP data is carried in the machine, where machine control is not fitted to the machine.
 - A hardcopy of the approved GDP should be on hand at all times during the disturbance activity.
 - Stop work immediately and notify the **GDP Applicant** and **GDP Owner** where the work cannot be completed in accordance with the GDP. Works should not recommence until the **GDP Owner** has sought (i.e. re-submitted the GDP Application Form), obtained and supplied the **GDP Operator** with a revised and signed GDP. If an amendment is required (i.e. change to disturbance area or GDP extension), the **GDP Coordinator** will expedite the assessment.

Ground Disturbance Pick-up

Surveyor (or approved Exploration personnel):

16. **Survey/pick up of the actual ground disturbance** as directed by the **GDP Owner**. All spatial data, attributed with the appropriate MRF classification (where relevant), shall be provided to the **GDP Owner** and **GIS Specialist** in shapefile or GPX format within 30 days following completion of works.
17. **Sign Section 5.1 of the GDP** and return to the **GDP Owner**.

GDP Owner:

18. **Complete Section 5.2 of the GDP** and return to the **GDP Coordinator**.
 - Any GDP non-compliance shall be recorded in INX as an incident and investigated accordingly.

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GDP Coordinator:

19. **Save all close-out data to the server** and provide to **GIS Specialist**.

- If the close-out has not been received prior to the GDP's expiry date, contact the **GDP Owner** to prompt completion. If more time is required to complete the works, this should be communicated by the **GDP Owner** and the GDP modified or closed out and a new GDP issued, dependent on the circumstances.

7 References

7.1 Internal Document References

Document Number	Document Title
950-EN-FRM-0003	Ground Disturbance Permit Application Form
950-EN-REG-0002	Ground Disturbance Permit Register
950-EN-TEM-0001	Ground Disturbance Permit Template
950-EN-PRO-0002	Clearing and Grubbing Procedure
950-EN-PRO-0015	Weed Hygiene Procedure
950-EN-STA-0002	Significant Site Demarcation Standard
950-EN-PRO-0018	Significant Sites Demarcation Procedure

7.2 External References

External Reference (Legislation, Guidelines, Standards and Codes of Practice)
None.