

COBURN MINERAL SAND PROJECT  
ENVIRONMENTAL MANAGEMENT  
PLAN

**Bush Fire Management Plan**

*Prepared for*

**Gunson Resources Limited**

Level 2, 33 Richardson Street  
WEST PERTH

14 November 2006

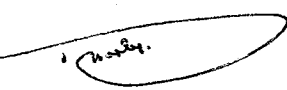
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## Environmental Management Plan Checklist: EAS Form 1b

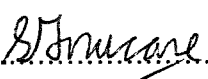
### General Information


Ministerial Statement No	723	Project Title	Coburn Mineral Sand Project
		Proponent	Gunson Resources Limited
EMP Title (including date and version number)	Final Draft Bush Fire Management Plan 14 November 2006 Revision 1		

EMP Content	Yes	No	Comments
Is the document structured according to the EMP guideline?	✓	<input type="checkbox"/>	-
Element - Is the aspect appropriately described?	✓	<input type="checkbox"/>	Refer to Section 1
Current Status – Are the project description and receiving environment details adequate?	✓	<input type="checkbox"/>	Refer to Section 2
Potential Impacts – Are the potential impacts described adequately?	✓	<input type="checkbox"/>	Refer to Section 3
Environmental Objectives – Are the objectives consistent with the Ministerial Statement and the EPA bulletin?	✓	<input type="checkbox"/>	Refer to Section 4
Performance Indicators/Criteria – Are the indicators and criteria used meaningful, sufficient and appropriate?	✓	<input type="checkbox"/>	Refer to Section 5
Are the criteria verifiable and reproducible?	✓	<input type="checkbox"/>	
Implementation strategy – Are the strategies, tasks and the action program adequate for the environmental objectives?	✓	<input type="checkbox"/>	Refer to Section 6
Have roles and responsibilities been identified?	✓	<input type="checkbox"/>	
Have adequate timeframes and priorities been identified?	✓	<input type="checkbox"/>	
Monitoring – Is the program to monitor performance against objectives and criteria adequate?	✓	<input type="checkbox"/>	Refer to Section 7
Are details provided on how/when monitoring will be undertaken and reported?	✓	<input type="checkbox"/>	
Contingencies – Are the mechanisms to identify actual and apparent non-conformance adequate?	✓	<input type="checkbox"/>	Refer to Section 8
Are the actions to address non-conformances adequate?	✓	<input type="checkbox"/>	
Stakeholder consultation – Is a list of major stakeholders and details of how and when they were and will be consulted, provided?	✓	<input type="checkbox"/>	Refer to Section 9
Auditing – Are details of an audit process to demonstrate implementation and compliance provided?	✓	<input type="checkbox"/>	Refer to Section 10
Review and Revision – Is a suitable process to assess the adequacy of the plan detailed?	✓	<input type="checkbox"/>	Refer to Section 11
Reporting – are the reporting details provided adequate?	✓	<input type="checkbox"/>	Refer to Section 12
Key Management Actions Table - Has adequate information been provided in the Table?	✓	<input type="checkbox"/>	Refer to Section 13
Does the table list the key actions, how implementation will be reported and the evidence that will be provided to DoE?	✓	<input type="checkbox"/>	
Figures and Tables – Have relevant figures and tables been provided?	✓	<input type="checkbox"/>	-
Advisory bodies – Has advice been sought from all relevant advisory bodies and incorporated into the EMP?	✓	<input type="checkbox"/>	Advice has been sought from appropriate government regulatory agencies and key stakeholders.
Has evidence of this advice been provided with the document?	✓	<input type="checkbox"/>	Refer to attached cover letter for Proponents response to submissions
Additional Comments			
The EMP has been developed in accord with the DoE EMP guideline.	 ..... Environmental Manager		14 November 2006  Date

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## 1.1 Background

Gunson Resources Limited (Gunson) is developing the Coburn Mineral Sand Project (the Project) in the Shark Bay district of Western Australia (WA), approximately 250 km north of Geraldton and 84 km southeast of Denham. The Project Area is located immediately east of the Shark Bay World Heritage Property (SBWHP). The Project will comprise the mining and processing of a major low grade heavy mineral sand deposit approximately 18 km long, up to 3 km wide and between 10 m and 40 m thick.

The Project was assessed as a Public Environmental Review (PER) under Part IV of the WA *Environmental Protection Act 1986*. In addition, the Project is considered to be a "controlled action" under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The environmental assessment was conducted in accordance with the bilateral agreement between the Commonwealth of Australia and WA, meaning that the Commonwealth accredited the WA environmental impact assessment process.

The PER (URS, 2005) was issued in July 2005 for an eight-week public review period and the Report and Recommendations of the WA Environmental Protection Authority (EPA) (EPA Bulletin 1211) was published in December 2005. Environmental approval for the Project was granted by the State Minister for the Environment in May 2006 (Ministerial Statement No. 723) and the Commonwealth Environment Minister in July 2006.

## 1.2 Aspect

This Bush Fire Management Plan is part of a series of management plans (MPs) for the Project, that is known collectively as the Environmental Management Plan (EMP). The purpose of the EMP is to provide measures proposed by Gunson to prevent or mitigate potential impacts to the environment and heritage values during construction and operation of the Project. The MPs were developed based upon the impacts identified during the environmental risk assessment process undertaken during the PER, with consideration given to stakeholder comment and issues addressed during the EPA's and Department of Environment and Heritage's (DEH) assessment of the Project.

This Bush Fire Management Plan has been prepared in accordance with Condition 11 of Ministerial Statement No. 723 (see Section 1.4).

There are three basic values that can be potentially threatened by bush fire; human lives, assets and environmental values. Bush fires can pose a threat to people working at the Project site and surrounding properties. There are also considerable economic assets associated with the Project that can be damaged by fire. In addition, the Project is adjacent to the SBWHP and pastoral properties that have high nature conservation values. For these reasons, Gunson considers bush fire management to be an important component of overall environmental, health and safety management.

Fire naturally occurs in the semi-arid environment and has an important role in determining vegetation structure and composition. There is little known about the effect of fire on vegetation communities in the

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region. On surrounding pastoral leases, vegetation structure has been modified by introducing non endemic grasses and grazing of native shrubs and this has probably altered natural fire regimes in some parts (CALM, 2005). Bush fires are a natural factor of the Australian environment and will inevitably occur in the future within the region.

The purpose of this Management Plan is to facilitate effective fire management practices during construction and operation of the Project. The plan aims to manage site operations in a way that prevents fires and protects life, property and the natural and cultural values of the area. Due to the low population densities adjacent to the Project Area, management strategies will be centred on residential operational staff, surrounding landholders and associated infrastructure.

The plan aims to be consistent with the following regional plans and policies:

- Midwest Gascoyne District – Wildfire Response Plan (FESA, 2003);
- Department of Environment and Conservation (DEC) – (formerly CALM) Fire Management Policy Statement No.19 outlined in the Shark Bay Terrestrial Reserves Management Plan 2000 – 2009 (CALM, 2000);
- Shire of Shark Bay - Bush Fire Brigades Local Law (Shire of Shark Bay, 2002); and
- Shire of Shark Bay – Fire Notice and Requirements.

### 1.3 Applicable Legislation

The relevant legislation applicable to the Bush Fire Management Plan includes:

- *Bush Fire Act 1954*; and
- Bush Fires Regulations 1954.

### 1.4 Ministerial Conditions

The Ministerial Conditions relating to Bush Fire Management for the Project from Ministerial Statement No. 723 (dated 22 May 2006) are as follows:

#### ***Bush Fire Management***

11-1 Prior to commencement of ground-disturbing activity, the proponent shall prepare a Bush Fire Management Plan to the requirements of the Minister for the Environment on advice of the Environmental Protection Authority.

11-2 The Bush Fire Management Plan required by condition 11-1 shall include:

1. Bush fire prevention measures;

2. Bush fire detection and reporting procedures;
3. Fire brigade and the proponent's fire suppression equipment and preparedness measures; and
4. Training of personnel for fighting fires.

11-3 The proponent shall implement the Bush Fire Management Plan required by condition 11-1.

11-4 The proponent shall make the Bush Fire Management Plan required by condition 11-1 publicly available.

Note: In the preparation of advice to the Minister for the Environment, the Environmental Protection Authority expects that the advice of the following agencies will be obtained:

- Department of Conservation and Land Management; and
- Fire and Emergency Services Authority.

11-5 The proponent shall report within the Annual Environmental Reports required by condition 5-4 the outcomes of any monitoring programs and performance reviews associated with the implementation of the Bush Fire Management Plan required by condition 11-1.

The requirements of the Bush Fire Management Plan are outlined in Conditions 11-2. Table 1.1 identifies where in this document these requirements have been addressed.

**Table 1.1  
Management Plan Requirements**

<b>Ministerial Condition</b>	<b>Requirement</b>	<b>Where Addressed in this MP</b>
11-2 (1)	The Bush Fire Management Plan shall include bush fire prevention measures.	Section 6
11-2 (2)	The Bush Fire Management Plan shall include bush fire detection and reporting procedures.	Section 6 and 12
11-2 (3)	The Bush Fire Management Plan shall include fire brigade and the proponent's fire suppression equipment and preparedness measures.	Section 6
11-2 (4)	The Bush Fire Management Plan shall include training of personnel for fighting fires.	Section 6

## 2.1 Project Overview

The Project proposed in the PER included mining and processing of ore from ten open cut pits. However, during the environmental assessment process, Gunson decided to seek approval to develop only nine pits until operational data became available to validate and refine the prediction of environmental impacts associated with Pit 10. Consequently, the main components of the Project comprise:

- nine open-cut mine pits;
- up to two processing plants that will be relocated as mining progresses northwards;
- a borefield;
- haul roads and access corridors;
- offices, workshops and other supporting infrastructure; and
- an accommodation camp.

The key characteristics of the approved Project are summarised in Table 2.1.

**Table 2.1**  
**Key Characteristics of the Coburn Mineral Sand Project**

Element	Description
Project Life	Approximately 12 Years.
Number of Pits	Nine pits.
Rate of Mining	Approximately 2,300 tonnes per hour (tph) for the first two years, increasing to 4,600 tph in Year 3 (~15 million tonnes per hour (tpa) for Years 1 and 2, and 30 million tpa for Years 3 to 12).
Mining Method	Dozers and in-pit screening modules.
Estimated Footprint of Disturbance	Approximately 3,695 hectares.
Rate of Processing	Approximately 2,200 tph for the first two years increasing to 4,400 tph in Year 3 (~140,000 tpa of Heavy Mineral Concentrate from Year 1 increasing to 280,000 tpa from Year 3).
Estimated Volume of Tailings	2,180 tph for each 2,200 tph concentrator.
Volume of Process Water	Up to 18 GL/annum at full production.
Estimated Total Volume of Refined Product	Ilmenite – 1,400 kilotonnes (kt) HiTi – 380 kt Zircon – 660 kt

Source: Schedule 1 of Ministerial Statement No. 723

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## 2.2 Existing Environment

Fire has long been part of the Australian environment and has played an important role in shaping the flora and fauna (Smith, 1995). Fire occurs in most vegetation types and is a major factor affecting plant diversity, with impacts on both the “expression” and the “distribution” of diversity (Gill, 1996). This diversity is achieved through removing adult plants and recycling nutrients.

The Shark Bay area is located within a transitional climatic region that experiences an overlap of tropical and temperate zones, resulting in hot dry summers and mild winters. The area is classified as Hot Grassland (summer drought) by the Bureau of Metrology (2006). The Project Area comprises a complex dune system with high local relief and lower relief dunes with rolling terrain. Winds in the summer are primarily southerlies and south westerlies.

Surveys undertaken as a part of the PER identified the vegetation as part of the Tamala System, comprising tree heath with scattered trees. None of the communities identified during the surveys were listed as Threatened Ecological Communities. The vegetation in the Project Area is dominated by *Acacia* and *Triodia* species with varying amounts of organic material over the soil surface.

A total of eight native mammal species, 61 bird species and 45 reptile species were identified from in the Project Area. Most of the vertebrate species recorded during the surveys have a widespread distribution throughout the semi-arid region and are not restricted to individual habitats. Three species known to occur in the vicinity of the Project Areas are listed under the EPBC Act. These species include, Malleefowl (*Leipoa ocellata*), Thick-billed Grasswren (*Amytornis t. textilis*) and the Hamelin Skink (*Ctenotus zasticus*). These species are listed as ‘Vulnerable,’ under the Act, and are unlikely to be affected by localised spot fires in the Project Area.

The Project Area is located adjacent to the southeast boundary of the SHWHP which covers 2.2 million ha, including the marine reserves and terrestrial areas. Approximately 20 km north of the Project Area is Hamelin Pool Marine Nature Reserve. Zuytdorp Nature Reserve (also referred as Cooloomia Nature Reserve) is located south of the Project Area and is a Class C reserve with an area of 58,850 ha. The southern portion of the mine is located on the Coburn pastoral lease, while the northern portion of the mine is located on the Hamelin pastoral lease. To the south-east of the site is the Nerren Nerren pastoral lease, which is currently being used as grazing land for sheep and goats. The Bush Fire Management Plan aims to be consistent with these surrounding land uses in respect to fire management.

Fires are started from two possible causes:

- Natural events such as lightning strikes and storms; and
- Human-induced or anthropogenic events which include sparks from welding or grinding activities or from onsite accommodation areas and the transport and storage of diesel fuels.

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## 2.3 Fire History

### *Pre-European*

There are little data available to draw accurate conclusions about the fire regimes in the region before European settlement. Aboriginal people have occupied the region for thousands of years. It is likely that the vegetation would have been burnt regularly by the Aboriginal people. Bush fires in the region would have also been started by lightning strikes throughout the summer season. The flora and fauna of the area has adapted to recover from fire.

### *Post-Settlement*

There is only limited documentation of the fire history of the neighbouring properties. In recent years, many of the fires in the region have resulted from human activities (CALM, 2005). Several fires have occurred in the inland portion of Zuytdorp Nature Reserve over the past few decades (CALM, 2000).

In 2000, CALM released the Shark Bay Terrestrial Reserves Management Plan 2000-2009 (CALM, 2000). The plan addresses current fire management practices on selected conservation reserves in the Shark Bay area. Three burning regimes have been applied to the various reserves:

- no planned burn areas;
- prescribed burn buffers; and
- habitat management burns.

The DEC's fire management procedures are carried out in accordance with the *Bush Fires Act 1954* and The DEC's's Fire Management Policy Statement No.19, which is currently being reviewed. The policy outlines strategies for fire suppression, use of fire, liaison, public awareness and research. The Department's goals for fire management are as follows:

- to protect community and environmental values on lands managed by the Department from damage or destruction from wildfire; and
- to use fire as a management tool to achieve land management objectives, in accordance with designated land use priorities (CALM, 2000).

The DEC is of the view that unplanned fires may be suppressed or left to burn depending on the risk to life, property and environmental values, the environmental impacts of suppression activity and the feasibility of suppression.

The Project Area covers the Coburn, Hamelin and Meadow pastoral leases. Coburn pastoral lease is owned by Gunson, while Hamelin and Meadow pastoral leases are privately owned. The responsibility and management of fire prevention and suppression will be shared over the three leases.

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Different land uses in the vicinity of the Project Area have meant that differing management strategies and agencies are currently in place. Each land use type and their fire management strategies are listed below.

- **SBWHP (west and south of the Project Area):** This area is managed by the DEC and a policy of fire management for the protection of World Heritage values and the overall integrity of the World Heritage Property has been adopted. In the event of a significant fire in the area that has the potential to degrade the values of the World Heritage Property, personnel will be mobilised from regional areas such as Denham, Kalbarri and Geraldton.
- **Meadow and Hamelin pastoral leases (east and north east of the Project Area) –** These pastoral leases are privately leased and managed and therefore fire management and suppression is the responsibility of the pastoral lease holder. The local fire fighting services such as the Shire of Shark Bay, DEC and/or Fire and Emergency Services (FESA) would be mobilised in the event of a significant bush fire.

In summary, a number of organisations have a role in the management of fire prevention and suppression in the region. This emphasises the need for a Bush Fire Management Plan which identifies threats and risks and sets out measures which must be followed to minimise fire-related problems. The plan will assign responsibilities for implementation and ensures lines of responsibility and accountability are clearly understood by all parties. Mutual arrangements will be established between other hazard management agencies on a neighbourly basis.

The impact of the Project on fire management may include:

- Increased possibility of accidental fire in the region;
- Loss of life;
- Damage to infrastructure such as fences, machinery and site buildings;
- Loss of stock from surrounding pastoral leases;
- Increased susceptibility of erosion or invasion by weeds following a fire disturbance;
- Loss of vegetation and flora species; and
- Loss of localised fauna habitat and species in the event of a fire.

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### 4.1 Principles

The Bush Fire Management Plan has two underlying principles. These are:

- Every reasonable measure must be taken to protect assets, site personnel, visitors and surrounding neighbours and stock from bush fire; and
- Management of people and assets must be integrated with management of the ecosystem within the Project Area and surrounding area.

To meet these principles, the plan will be developed in consultation with the Shire of Shark Bay, DEC (Denham Office) and FESA (Midwest Gascoyne District Office).

### 4.2 Objectives of the Bush Fire Management Plan

The three main objectives of the Bush Fire Management Plan are as follows:

- To protect life and assets within the Project Area and neighbouring properties from the threat of bush fires;
- To conserve and minimise impacts on natural ecosystems; and
- To ensure effective and cooperative arrangements for fire management between the various Project stakeholders and neighbouring properties.

Gunson will implement the “Comprehensive Approach” to emergency management as outlined in FESA (2003) Wildfire Response Plan to address the objectives above. This provides for a comprehensive and systematic way of managing hazards. The approach separates the management aspects into four elements:

- Prevention;
- Preparedness;
- Response; and
- Recovery.

In addition, it is necessary that the provisions of this plan fit within the provisions of the overarching EMP for the Project.

The effectiveness of the Bush Fire Management Plan will be determined through regular monitoring and reporting of Gunson's preventative fire management procedures. Management actions will be reviewed to assess if these procedures have been achieved. All bush fires will be recorded and reported to Shire of Shark Bay, DEC and FESA. Records will document the time, date, location and cause of the fire.

Table 5.1 presents the performance indicators for each of the key management actions.

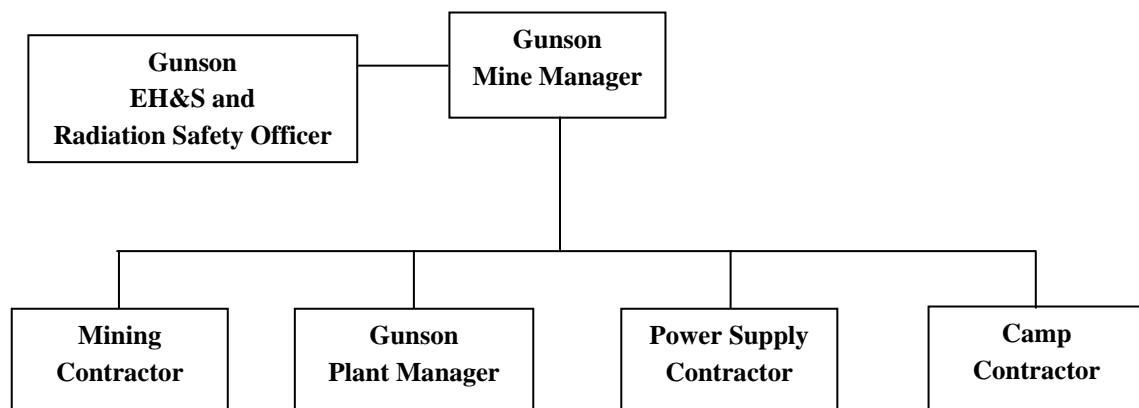
**Table 5.1**  
**Performance Indicators for Key Management Actions**

<b>Key Management Actions</b>	<b>Performance Indicator</b>
Maintain fire fighting equipment	Fire fighting equipment is in good operable condition.
Maintain fire breaks	Fire breaks are clean and accessible.
Maintain evacuation routes	Evacuation routes are accessible, clearly signposted and maintained around the plant, office and accommodation areas.
Safe storage of Dangerous Goods	Oxygen cylinders and fuel are not stored together (within 3 m). Flammable materials are not stored within 5 m of occupied buildings and secured and signposted.
Hot Work Permits	Completion of Hot Work Permits by contractors when conducting open flame activities.
Personnel fire training	All personnel likely to attend a fire are adequately trained.
Complete fire inspection checklist	Records of completed fire inspections.
Maintain community liaison in the area	Records of correspondence and attendance to local fire committee meetings.
Ensure review of the Bush Fire Management Plan	Plan reviewed and signed off every five years.
Review training needs	Record of training reviews.
Complete fire incident reports and notify relevant authorities	Incident reports are in place for all fires, date, location and area burnt.
Ensure relevant information is provided in Annual Environmental Report	Submission of Annual Environmental Report to DEC and DoIR.

The strategies identified in this section will be adopted to achieve the broad objectives outlined in Section 4. As discussed, Gunson will adopt the “Comprehensive Approach” to emergency management as outlined by FESA. The management of hazards is divided into four elements prevention, preparedness, response and recovery.

Table 6.1 presents the required management actions, responsible personnel and timing to achieve the objectives. These management actions will be implemented into the Project to ensure that there will be no adverse effects as a result of the construction and operation of the Project. Fire Emergency Procedures will not be documented in this management plan as they will form part of a larger and more comprehensive Emergency Response Plan.

Gunson has developed a preliminary site organisational structure (Figure 6.1), with both a Mine Manager and an EH&S Officer directly employed by Gunson and based on-site. Responsibility for management actions has therefore largely been allocated to one of these two roles. However, it is expected that Gunson’s contractors will implement these actions with supervision, review and audit conducted by Gunson’s EH&S Officer and Mine Manager.



**Figure 6.1: Schematic Organisational Chart**

**Table 6.1  
Management Actions, Timing and Responsibility for Achievement of Objectives**

Objective (Based on FESA's Comprehensive Approach)	Element	Management Action	Responsible Personnel	Timing
<b>Prevention</b>	<b>Fire Detection</b>	Site personnel will report fires within the Project Area. Site personnel will also rely on detection and reporting of bush fires in the region by neighbours, DEC, FESA or Shire staff.	All site personnel	Construction/operation
		Identify potential sources of ignition e.g. natural gas supply to modular power units and fuel storage areas.	EH&S Officer	Construction/operation
		Gunson will advise DEC, FESA and the Shire of Shark Bay of the contact details for the site (including after hours contact details).	EH&S Officer	Construction/operation
	<b>Fire Equipment</b>	Vehicles will be regularly inspected and cleared of vegetation build-up.	Relevant contractors	Construction/operation
		All machinery capable of causing a fire during operation will be fitted with appropriate guards to prevent accidental ignition of vegetation from sparks or heat sources.	Relevant contractors	Construction/operation
		An onsite water truck fitted with a water tank and pump system capable of initial attack of spot fires will be located at the workshop area.	EH&S Officer	Construction/operation
		Gunson will supply sufficient fire fighting equipment (fire extinguishers, protective gear) to vehicles, machinery and accommodation areas and provide an effective placement plan for employees to locate necessary equipment in the event of an emergency.	EH&S Officer	Construction/operation

**Table 6.1 (cont.'d)**

<b>Objective</b> (Based on FESA's Comprehensive Approach)	<b>Element</b>	<b>Management Action</b>	<b>Responsible Personnel</b>	<b>Timing</b>
<b>Prevention (cont.'d)</b>	<b>Fire Equipment (cont.'d)</b>	Fire equipment will be checked and tested regularly to ensure they are in good working order and will be replaced or repaired where necessary.	EH&S Officer	Construction/operation
	<b>Access</b>	Access roads to and around the site will be regularly inspected and graded to ensure rapid deployment of fire fighting vehicles and earthmoving equipment to roll vegetation at the fires edge (if required).	EH&S Officer	Construction/operation
		At least two evacuation routes will be maintained from the work area and these will be identified to all personnel working on the Project.	EH&S Officer	Construction/operation
		In the northern region of the Project Area (Hamelin pastoral lease), Gunson will maintain existing firebreaks and access tracks along fence lines to assist in the control of fire.	EH&S Officer	Construction/operation
		Existing fence lines and access tracks on the Coburn lease will be maintained to assist in the control of fire.	EH&S Officer	Construction/operation
		Evacuation doors, points and routes will be clearly marked and maintained around the plant, office and accommodation areas. These doors will be inspected weekly as a part of the inspection checklist.	EH&S Officer	Construction/operation

**Table 6.1 (cont.'d)**

Objective (Based on FESA's Comprehensive Approach)	Element	Management Action	Responsible Personnel	Timing
<b>Prevention (cont.'d)</b>	<b>Storage</b>	Gunson will comply with all relevant regulations, under the Mines Safety and Inspection Regulations 1995 and <i>Dangerous Goods Safety Act 2004</i> for fuel transport, containment and storage. All fuel will be stored in accordance with the relevant Australian Standards. This is addressed in the Hydrocarbon Management Plan.	EH&S Officer	Construction/operation
		Oxygen and fuel gas cylinders will not be stored together, with a minimum of 3 m between cylinders.	EH&S Officer	Construction/operation
		Flammable materials (solid, liquid or gases) shall not be stored within 5 m of any occupied building. Then materials will be suitably secured and correctly signposted "Danger, Highly Flammable."	EH&S Officer	Construction/operation
	<b>Other</b>	Open fires will not be allowed in the Project Area.	All site personnel	Construction/operation
		All work involving heat, sparks or flame, such as welding and grinding will be performed at the designated Project workshop wherever practical. In the event of the work being carried out away from the workshop, all flammable materials will be cleared away from the area of works, whilst minimising disturbance to vegetation where possible. Fire extinguishers will be fitted to vehicles to extinguish spot fires. Where necessary a water cart and pump will be provided.	Relevant contractors	Construction/operation
		A Hot Work Permit will be required for any activity involving heat, sparks or flames that is conducted away from the designated workshop area.	EH&S Officer	Construction/operation

**Table 6.1 (cont.'d)**

<b>Objective</b> (Based on FESA's Comprehensive Approach)	<b>Element</b>	<b>Management Action</b>	<b>Responsible Personnel</b>	<b>Timing</b>
<b>Preparedness</b>	<b>Training</b>	All employees will receive training in the Bush Fire Management Plan and will be shown the location and use of fire fighting equipment. Contractors will be briefed on Gunson's relevant fire management practices and emergency response and evacuation procedures. Fire drills will be carried out on a quarterly basis to ensure all personnel are familiar with the procedures. These will be addressed in the site induction.	EH&S Officer	Construction/operation
	<b>Equipment</b>	Fire fighting equipment will be checked and maintained on a regular basis.	EH&S Officer	Construction/operation
		Testing of alarm systems, escape routes and fire extinguishers will be conducted during weekly inspections.	EH&S Officer	Construction/operation
	<b>Housekeeping</b>	Gunson will maintain excellent housekeeping standards of storage areas and operational areas to keep down potential sources of flammable material.	Mine Manager	Construction/operation
	<b>Water Supplies</b>	A water fill station including a storage tank of adequate size to meet operational requirements shall be installed to facilitate the filling of the water truck. The water truck will be stored full at the workshop.	EH&S Officer	Construction/operation
<b>Response</b>	<b>Fire Suppression</b>	Upon becoming aware of a fire, the observer will alert all bystanders and then attempt to extinguish the fire, if this can be done safely. If the fire can be suppressed without additional resources, then personnel will suppress the fire, make the area safe and organise a patrol to monitor the suppressed fire.	All site personnel present at the fire	Construction/operation

**Table 6.1 (cont.'d)**

<b>Objective</b> (Based on FESA's Comprehensive Approach)	<b>Element</b>	<b>Management Action</b>	<b>Responsible Personnel</b>	<b>Timing</b>
<b>Response (cont.'d)</b>	<b>Fire Suppression (cont.'d)</b>	The senior person at the fire will co-ordinate fire fighting activities (in accordance with the Emergency Response Procedures) and will be responsible for ensuring that all personnel are kept safe at all times. The senior person shall notify the EH&S department and raise the alarm.	All site personnel	Construction/operation
		In the event that a fire is reported within the Project Area, the Mine Manager (or delegate) will assess the situation. The Mine Manager (or delegate) will decide whether to enact fire emergency procedures depending on the severity of the fire, current conditions and its potential to impact on infrastructure, or human and environmental values. Alternatively, if the fire is assessed as non-threatening and is not likely to impact on infrastructure, or human and environmental values it will be closely monitored and allowed to burn out.	Mine Manager	Construction/operation
		In the event that a fire occurs within the SBWHP adjacent to the Project Area or surrounding pastoral areas, Gunson will contact the DEC and relevant pastoralists to report the fire. The Mine Manager (or delegate) will assess the fire and whether it has the potential to migrate into the Project Area and impact on infrastructure, or human and environmental values, or significantly impact on the environmental values of the SBWHP. If this is the case, Gunson will implement emergency response procedures and liaise with DEC and other relevant authorities where necessary.  If a fire in the SBWHP is considered of low threat to human and environmental values by the Mine Manager or DEC, Gunson will monitor the fire and liaise with the DEC where required.	Mine Manager	Construction/operation

**Table 6.1 (cont.'d)**

Objective (Based on FESA's Comprehensive Approach)	Element	Management Action	Responsible Personnel	Timing
Response (cont.'d)	Communication	In the event that control of the situation is taken by fire fighting authorities Gunson personnel will follow the directions of the relevant authorities and assist where possible.	All site personnel	Construction/operation
		<p>In the event that a significant bushfire occurs in the SBWHP, or the Project Area, Gunson will follow the communication protocol outlined below to notify the DEC Midwest Regional Office in Geraldton.</p> <ol style="list-style-type: none"> <li>1. If the fire occurs during working hours then the Regional On Call Officer at Midwest Regional Office will be contacted on 9921 5955.</li> <li>2. If the fire occurs outside work hours then mobile number 0429 640 916 will be called and will be automatically diverted to the Regional On Call Officer.</li> <li>3. The following rostered Regional On Call Officers can be contacted:                             <ul style="list-style-type: none"> <li>Nigel Sercombe - 9964 9202 (H) 0417 930 009</li> <li>Kelly Gillen - 9964 7253 (H) 0419 941 629</li> <li>Anthony Desmond - 9965 0507 (H) 0419 919 097</li> <li>David Atkins - 99649867 (H) 0427 477 269</li> <li>Greg Kitson - 0417 975 455</li> </ul> </li> </ol>	Mine Manager	Construction/operation

**Table 6.1 (cont.'d)**

<b>Objective</b> (Based on FESA's Comprehensive Approach)	<b>Element</b>	<b>Management Action</b>	<b>Responsible Personnel</b>	<b>Timing</b>
<b>Response (cont.'d)</b>	<b>Communication (cont.'d)</b>	4. The answering machine at the DEC Midwest Regional Office will provide the after hours mobile contact number of the Regional On Call Officer.  5. The Departmental Duty Officer will be notified if the Regional On Call Officer is not contactable due to attending a Geraldton District Fire. Depending on the severity of the fire, DEC personnel will be mobilised from regional areas such as Denham, Kalbarri and Geraldton.  The Fire Control Officer at the Shire of Shark Bay should be contacted. This person is Mr Kelvin Matthews and he can be contacted on 0427 948 925. If he cannot be contacted, the Works Supervisor Mr Gary Brown can be contacted on 0428 178 501.  Emergency Services should also be contacted by dialling 000.  If required Gunson will contact the following surrounding pastoralists – <ul style="list-style-type: none"> <li>• Geoff and Daphne Brockman (Coburn Station) - (08) 9942 5913;</li> <li>• Brian and Mary Wake (Hamelin Station) - (08) 9942 5914; and</li> <li>• Harold Crawford (Nerren Nerren and Meadow Stations) - (08) 9962 9592.</li> </ul> Arrangements will be put in place to access DEC and the Shire's VHF radio network in the event of a fire. Emergency contact details will be provided to all personnel and site vehicles.	Mine Manager	Construction/operation

**Table 6.1 (cont.'d)**

<b>Objective</b> (Based on FESA's Comprehensive Approach)	<b>Element</b>	<b>Management Action</b>	<b>Responsible Personnel</b>	<b>Timing</b>
<b>Response (cont.'d)</b>	<b>Communication (cont.'d)</b>	<p>If a bushfire occurs on or near the Project Area, the response time to communicate with the relevant agencies will be dependant on the severity of the fire. The DEC and other relevant stakeholders will be notified of small fires which are easily extinguishable within a day of the incident, while more significant fire events will be immediately reported by the Mine Manager (or delegate) to DEC (Denham and Geraldton Offices), FESA, Shire of Shark Bay and neighbouring pastoralists.</p> <p>In the event of a significant bushfire requiring agency assistance, it is anticipated that the response time to communicate with these agencies will be less than 30 minutes.</p>	Mine Manager	Construction/operation
		<p>It will be the responsibility of the Mine Manager (or delegate) to communicate with the appropriate personnel to coordinate the necessary fire fighting equipment required for the first response of the fire. In the event that the fire is not immediately suppressed and further intervention is required. The Mine Manager would be responsible for contacting the appropriate fire fighting agencies (DEC, the Shire of Shark Bay, and/or FESA). [Note: an arrangement is yet to be formalised with the appropriate agencies].</p>	Mine Manager	Construction/operation
	<b>Responsibility</b>	<p>It will be the responsibility of the Mine Manager (or delegate) to ensure the evacuation of buildings and affected areas to a pre-arranged emergency meeting point. In the event of the Mine Manager being on leave, the acting mine manager will be responsible for this role.</p>	Mine Manager	Construction/operation
		<p>The EH&amp;S Officer will be responsible for liaisons with local authorities such as the Shire of Shark Bay, DEC (Denham office) and the Midwest Gascoyne District FESA office on a as needs basis.</p>	EH&S Officer	Construction/operation

**Table 6.1 (cont.'d)**

<b>Objective</b> <small>(Based on FESA's Comprehensive Approach)</small>	<b>Element</b>	<b>Management Action</b>	<b>Responsible Personnel</b>	<b>Timing</b>
<b>Response (cont.'d)</b>	<b>Responsibility (cont.'d)</b>	Gunson supports FESA's Wildfire Response Plan and will provide personnel and assistance to neighbouring pastoralists, DEC and the Shire of Shark Bay as far as practical.	Mine Manager	Construction/operation
		Gunson will ensure that all fire fighting activities will be performed in accordance with the <i>Bush Fire Act 1954</i> .	Mine Manager	Construction/operation
<b>Recovery</b>	<b>Assessment</b>	Once the site has been deemed safe to re-enter the Mine Manger (or delegate) will assess the extent of damage to the site and equipment and determine if works can resume. Part of the assessment will be to determine if the resumption of works will cause increased environmental damage, such as increasing the susceptibility of sand blowouts.	Mine Manager	Construction/operation
<b>Review (Refer to Section 11)</b>		The Bush Fire Management Plan will be reviewed every five years following the date of implementation, or earlier if a significant fire event has occurred to warrant a procedural review.	EH&S Officer	Construction/operation
		Gunson will review training needs and protocols on an annual basis.	EH&S Officer	Construction/operation
<b>Reporting (Refer to Section 12)</b>		All fire incidents will be reported to the Mine Manager (or delegate). The person who observes the incident is responsible for reporting the incident.	Site personnel present at the fire	Construction/operation
		Fire and safety training undertaken by site personnel will be recorded and maintained.	EH&S Officer	Construction/operation
		Relevant information will be provided to the DEC and DoIR in Gunson's Annual Environmental Report.	EH&S Officer	Construction/operation

It is anticipated that through the implementation of the proposed management actions, the likelihood of adverse impacts arising from the Project will be minimised. Visual monitoring will be undertaken through the weekly environmental inspections. The inspections will be conducted to ensure adequate fire control measures are being implemented and maintained at the site. Fire fighting equipment will be checked regularly to ensure they are in good working order and will be replaced or repaired where necessary.

Evacuation doors, points and routes will be clearly marked and maintained around the plant, office and accommodation areas. These doors will be inspected weekly as a part of the inspection checklist. All staff will be responsible for alerting fires that occur on the site.

In the event of a fire occurring, Gunson will visually monitor the regeneration of the post-burn vegetation, in particular the recolonisation of weeds. Rehabilitation of burnt areas will be undertaken by Gunson on an as-needs basis and may include weed, erosion or dust control. Fire breaks will also be visually monitored as a part of the environmental inspection and contingency actions implemented if required. All monitoring results will be provided in the Annual Environment Report.

Contingency actions will be implemented when problems are identified during the environmental inspection process. This will include, but not limited to, inspection of fire fighting equipment, access roads and evacuation routes. Reviews of training needs, protocols or plans may also initiate contingency actions. The Mine Manager or EH&S Officer may need to initiate contingency actions, such as ordering work to cease until acceptable conditions or remedial actions have been implemented.

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## 9.1 During the EIA Process

Gunson undertook preliminary consultation with the following stakeholders prior to submission of the PER in regards to the Bush Fire Management Plan:

- DEC Denham office;
- Fire and Emergency Services Authority of Western Australia (FESA) Midwest Gascoyne District;
- Shark Bay Shire Council;
- SBWHP Community Consultative Committee (CCC);
- SBWHP Scientific Advisory Committee (SAC);
- Yamatji Land Council; and
- Surrounding pastoral land holders.

The public commented on the Project during an eight-week public review period for the PER. No issues were raised by the public during the review process.

## 9.2 Consultation during Preparation of the Bush Fire Management Plan

Ministerial condition 11-1 requires that this Bush Fire Management Plan be prepared to meet the requirements of the Minister for the Environment on advice of the EPA. In addition, the DEC's guidelines on the preparation of EMPs state that the relevant advisory agencies and other stakeholders require an opportunity to provide input to the draft Management Plan. The relevant stakeholders for this Bush Fire Management Plan are:

- EPA;
- DEC (Midwest Region and the Environmental Management Branch);
- FESA (Midwest Gascoyne District);
- Shire of Shark Bay;
- SBWHP CCC; and
- SBWHP SAC.

To obtain advice from these stakeholders, a draft MP was submitted to the DEC, FESA and the Shire of Shark Bay for review. The plan was approved by FESA on 5 September 2006 and comments were

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received from the DEC on 18 September 2006. No comments were received from the Shire of Shark Bay. Feedback from the DEC was addressed during the preparation of the final draft of the MP, prior to submission to the DEC Statement Management Section.

Documentation on the comments received from the DEC, and the way in which these comments have been addressed in the MP, has been submitted to the DEC Statement Management Section under separate cover. It is understood that the DEC Statement Management Section will consult with the EPA to obtain its input on the final draft of the MP.

The final MP will be prepared following receipt of comments from the EPA and will be submitted to the EPA through the DEC Statement Management Section and the DEC Audit Branch for sign-off.

### **9.3 Consultation during Construction and Operation**

Gunson is confident that concerns raised by stakeholders regarding the management of fire can be managed in a safe and effective manner. Gunson will continue to consult with all fire management agencies and pastoral owners throughout the life of the Project and will address any issues raised by stakeholders.

Gunson will establish and maintain a programme and procedures for periodic audits of the EMP, including this MP. The current audit programme is outlined in URS (2006). Maintenance and implementation of the audit programme will be the responsibility of Gunson's EH&S Officer.

Environmental audits can occur in many forms, but have a common objective: to assess the environmental performance of a facility in order to identify risks and potential liabilities. For this Project, the audits will also be required to provide information and evidence for the reports required under the Ministerial Statement, which are listed in Section 12 of this MP.

The format of the audit will depend on the issue or area being reviewed but could include the following phases:

- Development of the audit protocol.
- Completion of a questionnaire by site personnel prior to a site visit by the auditor.
- Site visit, comprising interviews, site inspections and/or direct measurement.
- Review of relevant documentation and records.
- Preparation and submission of the audit report.

This MP will be audited on an annual basis and the outcomes included in the relevant reports required under Ministerial Condition 5 (see Section 12). Information on the results of the audits will also be provided to Gunson management for review.

In addition to formal audits by internal or external auditors to meet the reporting requirements for Ministerial Condition 5, internal area or facility inspections will be conducted to assess the effectiveness of day-to-day environmental management. This will allow opportunities for improvements in environmental performance to be identified and acted upon as soon as possible. The inspections will occur on a weekly, monthly or less frequent basis, depending on the area or facility being reviewed.

This MP will be reviewed on an annual basis or more frequently if required, to address the following:

- Any changes in Project design or operation that require modifications to the environmental management procedures outlined in this MP;
- Any issues identified as a result of internal and external audits, and Gunson management review of the audit outcomes, in relation to the suitability, adequacy and effectiveness of this MP in meeting the agreed objectives; and
- Corrective or preventative actions developed in response to environmental incidents and non-conformances.

The revised MP will be submitted to the relevant stakeholders (see Section 9) for review and approval.

The revision number for the MP will be recorded on the document's signature page.

## 12.1 Internal Reporting

Environmental records are evidence of the ongoing environmental performance of the Project and demonstrate conformance with legal and other requirements. Environmental records to be maintained by Gunson and/or its contractors will include:

- A register of legal and other regulatory requirements including licences and permits;
- A register of environmental aspects and impacts
- Incident reports;
- Training records;
- Inspection, calibration and maintenance records;
- Monitoring data;
- A register of non-conformances;
- Public complaints and responses to these; and
- Internal and external audits and reviews.

## 12.2 External Reporting under the State Ministerial Approval

The reporting requirements defined under Ministerial Statement No. 723 are as described below. There is a degree of overlap for these reports, and it is expected that some of these reports will be combined to simplify the review process.

### 12.2.1 Compliance Reports

Compliance reports are required under Ministerial Condition 5-1 to address:

- The status of implementation of the proposal, as defined in Schedule 1 of the Ministerial Statement;
- Evidence of compliance with the conditions and commitments; and
- The performance of the environmental management plans and programs.

These reports are to be submitted to on an annual basis, or more frequently if sign-off of a condition or commitment is required more rapidly than annually.

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### 12.2.2 Performance Review Reports

Performance review reports are required every five years after the start of operations. These are required to address:

1. The major environmental issues associated with implementing the project; the environmental objectives for those issues; the methodologies used to achieve these; and the key indicators of environmental performance measured against those objectives;
2. The level of progress in the achievement of sound environmental performance, including Australian industry benchmarking, and the use of best available technology where practicable;
3. Significant improvements gained in environmental management, including the use of external peer reviews;
4. Stakeholder and community consultation about environmental performance and the outcomes of that consultation, including a report of any on-going concerns being expressed; and
5. The proposed environmental objectives over the next five years, including improvements in technology and management processes.

### 12.2.3 Independent Audit Report

Ministerial Condition 5-3 requires that an independent auditor prepare a report on each condition/commitment included in the Ministerial Statement which requires preparation of a management plan, programme, strategy or system. The objective of the report is to determine whether the requirements of these conditions and commitments have been fulfilled within the stated timeframe.

It is expected that this report could be included in the Compliance Reports submitted in accordance with Ministerial Condition 5-1.

### 12.2.4 Annual Environmental Report

An Annual Environmental Report (AER) is required under Ministerial Condition 5-4. The purpose of the AER is to report on:

- Implementation of Gunson's environmental commitments (but not the Ministerial Conditions); and
- Outcomes of any monitoring programs and performance reviews associated with the implementation of the MPs.

Unlike the other reports required under Ministerial Condition 5, this report is to be made available to the public.

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This report is not to be confused with the AER required by the DoIR as part of mining lease conditions (Section 12.4), or by the DEC in relation to licensing under Part V of the *Environmental Protection Act 1986* (Section 12.5).

### **12.3 External Reporting under the Commonwealth Ministerial Approval**

Condition 9 of the Commonwealth environmental approval issued under the EPBC Act requires that:

On 1 September of each year after the date of commencement of operations, the Project Director for the person taking the action must provide to the (Australian Government) Minister for the Environment and Heritage (the Minister) a certificate stating that the person taking the action has complied with the conditions of this Approval. This certificate must state, to the satisfaction of the Minister, the manner in which the approval conditions have been complied with. Should the Minister so direct, the person taking the action must appoint an independent auditor to audit compliance under this condition and make the results of that audit available to the Minister.

### **12.4 External Reporting under Mining Lease Conditions**

As part of the mining lease conditions set by the DoIR, Gunson will be required to submit an AER. The objectives of the AER are defined by the DoIR (Department of Minerals and Energy, 1996) as to:

- To concisely document the major mining activities for the reporting year and proposed activities for the following year;
- To concisely document environmental management and rehabilitation activities for the reporting year and proposed activities and developments in the following year;
- To assist operators in monitoring their own performance;
- To assist in the preparation of a completion report and audit for the DoIR on cessation of operations; and
- To provide basic information to DoIR about the extent of mining operations in the State and the standard of environmental management being achieved.

### **12.5 External Reporting under the Pollution Prevention Licence**

A pollution prevention licence will be required for the Project under Part V of the *Environmental Protection Act 1986*. This licence is not yet required. Once the licence has been issued, the need for reporting data relevant to this MP will be reviewed, and the MP amended if required.

The key management actions to be carried out to achieve the objectives outlined in the Ministerial Statement No. 723 are summarised in Table 13.1. The table forms the basis of annual compliance reporting, monitoring and auditing.

**Table 13.1**  
**Key Management Actions Table**

<b>Objective</b>	<b>Reference</b>	<b>Key Management Action</b>	<b>DEC Reporting/Evidence</b>	<b>Status</b>  <b>(to be updated in annual compliance reports)</b>
<b>Prevention (Fire Equipment)</b>	BF1.1	Fire equipment will be checked regularly to ensure it is in good working order and will be replaced or repaired where necessary.	Inspection records will be kept on-site and produced for regulators/auditors if/when required.	
<b>Prevention (Access)</b>	BF1.2	Gunson will maintain existing firebreaks on the Coburn pastoral lease and use existing access tracks for fire access to aid fire fighting and assist in fire control.	Inspection records will be kept on-site and produced for regulators/auditors if/when required.	
	BF1.3	Evacuation doors, points and routes will be clearly marked and maintained around the plant, office and accommodation areas.	Inspection records will be kept on-site and produced for regulators/auditors if/when required.	

**Table 13.1 (cont.'d)**

<b>Objective</b>	<b>Reference</b>	<b>Key Management Action</b>	<b>DEC Reporting/Evidence</b>	<b>Status</b>  <b>(to be updated in annual compliance reports)</b>
<b>Prevention (Storage)</b>	BF 1.4	<p>Oxygen and fuel gas cylinders shall not be stored together, with a minimum of 3 m between cylinders.</p> <p>Flammable materials (solid, liquid or gases) shall not be stored within 5 m of any occupied building, suitably secured and correctly signposted “Danger Highly Flammable.”</p>	<p>Inspection records will be kept on-site and produced for regulators/auditors if/when required.</p>	
<b>Prevention (Other)</b>	BF 1.5	<p>All work involving heat, sparks or flame, such as welding and grinding will be performed at the designated Project workshop wherever practical. In the event of the work being carried out away from the workshop, all flammable materials will be cleared away from the area of works, whilst minimising disturbance to vegetation where possible. Fire extinguishers will be fitted to vehicles to extinguish spot fires. Where necessary a water cart and pump will be provided. A Hot Work Permit will be required for any activity involving heat, sparks or flames that is conducted away from the designated workshop area.</p>	<p>Copies of completed Hot Work Permit will be kept on-site and produced for regulators/auditors if/when required.</p>	

# Key Management Actions Table

**Table 13.1 (cont.'d)**

Objective	Reference	Key Management Action	DEC Reporting/Evidence	Status  (to be updated in annual compliance reports)
<b>Preparedness (Training)</b>	BF 2.1	All employees will receive training in the fire management plan and will be shown the location and use of fire fighting equipment. Contractors will be briefed on Gunson’s relevant fire management practices and emergency response and evacuation procedures.	Training records will be kept on-site and produced for regulators/auditors if/when required.	
<b>Response (Responsibility)</b>	BF 3.1	The EH&S Officer will be responsible for weekly inspection and testing of alarm systems, escape routes and fire extinguishers.	Inspection records will be kept on-site and produced for regulators/auditors if/when required.	
	BF 3.2	The EH&S Officer will be responsible for liaisons with local authorities such as DEC (Denham office); Shire of Shark Bay and the Midwest Gascoyne District FESA office on a as needs basis.	Correspondence with local authorities conducted throughout the year shall be summarised within the AER.	
<b>Review</b>	BF 4.1	The Bush Fire Management Plan will be reviewed every five years following the date of implementation, or earlier if a significant fire event has occurred to warrant a procedural review.	Review documents will be kept on-site and produced for regulators/auditors if/when required.	
	BF 4.2	Gunson will review training needs and protocols on an annual basis.	Review documents will be kept on-site and produced for regulators/auditors if/when required.	

# Key Management Actions Table

**Table 13.1 (cont.'d)**

Objective	Reference	Key Management Action	DEC Reporting/Evidence	Status  (to be updated in annual compliance reports)
Reporting	BF 5.1	<p>All fire incidents will be reported to the Mine Manager (or delegate), who will prepare an incident report.</p> <p>The Mine Manager (or delegate) will notify the following parties of a fire incident as soon as practicable:</p> <ul style="list-style-type: none"> <li>• The District Inspector of Mines, Department of Industry and Resources;</li> <li>• The District Environmental Officer, Department of Industry and Resources;</li> <li>• The Chief Bushfire Control Officer, Shire of Shark Bay;</li> <li>• The Manager of the District DEC office; and</li> <li>• Neighbouring Pastoralists.</li> </ul>	Incident reports will be kept on-site and produced for regulators/auditors if/when required.	
	BF 5.2	Fire training and emergency response procedure records will be maintained by the EH&S Officer.	Reporting documents will be kept on-site and produced for regulators/auditors if/when required.	
	BF 5.3	Relevant information will be provided to the DEC and DoIR in Gunson's Annual Environmental Report.	Submission of an Annual Environmental Report.	

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- URS Australia Pty Ltd (2006) *Audit Programme. Coburn Mineral Sand Project Compliance Audit and Performance Review Programme*. Prepared for Gunson resources Limited, July 2006.

URS Australia Pty Ltd (URS) has prepared this report in accordance with the usual care and thoroughness of the consulting profession for the use of Gunson Resources Pty Ltd and only those third parties who have been authorised in writing by URS to rely on the report. It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this report. It is prepared in accordance with the scope of work and for the purpose outlined in the Proposal dated 1 June 2006.

The methodology adopted and sources of information used by URS are outlined in this report. URS has made no independent verification of this information beyond the agreed scope of works and URS assumes no responsibility for any inaccuracies or omissions. No indications were found during our investigations that information contained in this report as provided to URS was false.

This report was prepared between June and November 2006 and is based on the conditions encountered and information reviewed at the time of preparation. URS disclaims responsibility for any changes that may have occurred after this time.

This report should be read in full. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. This report does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.