Decision Report

Application for Works Approval

Part V Division 3 of the Environmental Protection Act 1986

Works Approval Number	W6865/2023/1
Applicant	Golden Spur Resources Pty Ltd
ACN	161 329 933
File number	DER2023/000733
Premises	Bellevue Gold Project Goldfields Highway, Sir Samuel, WA, 6347 Legal description Mining tenement M36/25 As defined by the premises maps attached to the issued works approval
Date of report	12 June 2024
Decision	Works approval granted

Mariana de Moraes SENIOR ENVIRONMENTAL OFFICER, INDUSTRY REGULATION (STATE-WIDE DELIVERY)

Officer delegated under section 20 of the Environmental Protection Act 1986

Table of Contents

1.	Decis	sion summary1							
2.	Scop	e of assessment1							
	2.1	Regula	atory framework	1					
	2.2	Applic	ation summary and overview of premises	1					
	2.3	Part I\	/ of the EP Act	3					
	2.4	Paste	Paste plant details						
		2.4.1	Tailing material characteristics	5					
3.	Risk assessment5								
	3.1	Source	e-pathways and receptors	5					
		3.1.1	Emissions and controls	5					
		3.1.2	Receptors	7					
	3.2	Risk ra	atings	10					
4.	Consultation13								
5.	Conc	lusion		15					
Refe	erence	S		15					

Table 1: Proposed applicant controls	5
Table 2: Sensitive human and environmental receptors and distance from prescribed activity.	8
Table 3: Risk assessment of potential emissions and discharges from the premises during construction, commissioning, and operation1	1
Table 4: Consultation1	3

Figure 1: Bellevue Gold Project paste plant location and associated infrastructure	2
Figure 2: Proposed paste plant layout	4

1. **Decision summary**

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the construction and operation of the premises. As a result of this assessment, works approval W6865/2023/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) has considered and given due regard to its regulatory framework and relevant policy documents which are available at https://dwer.wa.gov.au/regulatory-documents.

2.2 Application summary and overview of premises

On 15 November 2023, Golden Spur Resources Pty Ltd (GSR, or 'the applicant') submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act).

The application is to construct and operate a paste plant at the Bellevue Gold Project (BGP, or 'the premises'). The premises is approximately 40 km north of Leinster within the Shire of Leonora.

The premises relates to the categories and assessed production / design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in works approval W6865. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in works approval W6865.

The Bellevue Gold Project is owned and operated by Golden Spur Resources Pty Ltd, a wholly owned subsidiary of Bellevue Gold Limited (Bellevue). Additional infrastructure for the Project is also located on tenements owned by Giard Pty Ltd (Giard), itself a wholly owned subsidiary of Bellevue. The BGP is a historic gold mining operation located within Mineral Field 36 in the Northern Goldfields Region of WA. The Project is adjacent to the Goldfields Highway that passes through the tenements to the west of the historic Bellevue Mine.

The proposed paste plant will be constructed 150 m west of the newly constructed processing facility. The paste plant will occupy approximately 0.6 ha (see Figure 1) and will be capable of producing 120 m³/hr of paste with a total throughput per year of approximately 400,000 m³ deposited underground.

Thick tailings from the processing plant will be the feed material for the paste plant, which will be pumped to the proposed facility. These filtered tailings will be mixed with a cementitious binder in the paste plant to form a cemented paste fill. This paste will then be transferred underground by gravity to paste distribution boreholes, which will be delivered as required through the underground distribution system.



Figure 1: Bellevue Gold Project paste plant location and associated infrastructure.

2.3 Part IV of the EP Act

The Project was referred to the Environmental Protection Authority (EPA) on 7 December 2021 where details of the environmental factors including flora and vegetation, terrestrial fauna, social surroundings and inland waters were presented.

The EPA considered that the likely environmental effects of the proposal were not so significant to warrant formal assessment, due to the proposal being within a historically disturbed area. The decision was announced on 27 May 2022.

2.4 Paste plant details

The tailings from the processing plant will be pumped 500 m from the tailings thickener. These tailings, comprising approximately 55-60% solids, will be transported to an 800 m³ paste filter feed tank at the paste plant. The paste filter feed tank is designed to offer around four hours of residence time while producing paste at 120 m³/hr.

The processing plant to the paste plant pipeline will be laid within corridors constructed within a v-drain or earth bunding, in addition, sumps/catch pits will be constructed in various locations along the length of the pipeline bund/v drain. The applicant states the bunding and / or v-drains and sumps will be appropriately sized to accommodate the volume of material transferred through the pipeline.

When the paste plant is not operational or the paste filter feed tank is at capacity, the tailings will be diverted to the approved tailings storage facilities through the existing pipeline infrastructure.

The vacuum filter belt and paste feed hopper will be self-contained on a concrete pad, with all water flowing to a sump pump feeding back into the paste filter feed tank. Any overflow will be pumped back to the process water ponds in the existing processing plant via pipelines following the same route as the tailings line in a bunded corridor. Paste plant concrete areas will be graded to guarantee any contaminated stormwater is directed to a designated collection area designed to contain a 1-in-100-year rainfall event.

The seal water circuit will incorporate conductivity measurement and an automated dump system as protective measures against the accumulation of saline contamination in the water. This system will be equipped with magnetic flow meters to detect ruptures and a pressure transmitter to identify potential blockage issues promptly. The paste plant's location has been designed to ensure accessibility for a drill rig to facilitate borehole drilling in case of any blockage-related incidents.

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Not to Scale Source: GR Engineering Services 2023	PROJECT	CLIENT	
	Golden Spur F		
	Paste P	BELLEVUE	
RPMGLOBAL	3010		

Figure 2: Proposed paste plant layout

2.4.1 Tailing material characteristics

Tailings have been previously assessed by the department under works approval W6724/2022/1, issued 4 November 2022, latest amendment 19 February 2024. A materials characterisation assessment of the waste rock produced at BGP was completed by MBS Environmental Pty Ltd (MBS) in June 2021. The full report is provided to the department, with a summary of the testing and results for waste rock and tailings provided below.

Low grade ore and tailings samples were assessed by MBS during the materials characterisation assessment (MBS, 2021). Results of the four samples generated from each of the major mining lodes during metallurgical trials showed:

- All tailings samples were enriched in copper; molybdenum and tellurium, whilst individual ore and tailings samples were enriched in bismuth, rhenium, selenium, and tungsten. These enrichments reflect those of the waste rock and the BGP mineralisation.
- Initial, static leachate testing indicates that, if pyrrhotite oxidation can be minimised (as per the leach test conditions), the tailings and ore are likely to generate non-acid seepage typically containing low concentrations of metals and metalloids, consistent with findings for waste rock. Elevated concentrations of dissolved salts, metals and metalloids may generally be expected if the tailings were to undergo significant oxidation.
- Naturally occurring radiation levels in tailings and ore were low and no further assessment for NORM is considered necessary.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

To establish a risk event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this decision report are detailed in Table 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Vehicle movements, lift- off from stockpiles and/or stored product, earthworks etc.	Air / windborne pathway	 Dust suppression measures to be implemented as necessary. During adverse weather events (high winds and dry climate) activities will be restricted if dust cannot be appropriately controlled.

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
			 Vehicle speed limits will be implemented to reduce dust generation. If necessary, during adverse weather events reduce speed limits.
			 All vehicles are to remain on designated roads and access tracks.
			• Where possible, as a general principle minimise the area of vegetation clearance and progressively rehabilitate areas as soon as reasonably practical.
Noise	Noise generated during	Air / windborne	 Perform routine maintenance of vehicles and plant equipment.
	construction of paste plant infrastructure	pathway	 Where reasonably practical install noise attenuating equipment including mufflers and reversing air horns.
			 Noise attenuating equipment to be routinely monitored and maintained.
Commissioning and c	operation		
Dust generated during paste plant		Air/windborne pathway	 Dust suppression measures to be implemented as necessary.
operations. Vehicle movement.		causing impacts to health and amenity	 During adverse weather events (high winds and dry climate) activities will be restricted if dust cannot be appropriately controlled.
			• Where possible, as a general principle minimise the area of vegetation clearance and progressively rehabilitate areas as soon as reasonably practical.
			 Moisture content of the tailings will be maintained to minimize dust during paste plant operations.
Leak from, or failure of the process water pipeline	Process water and tailings pipeline	Discharge and leaching into groundwater or soils	• All pipelines associated with the return water and tailings will be bunded or contained within v drains to ensure all solids and liquids will be contained in the event of infrastructure failure.
			 Flow meters will be fitted to the paste plant and return water pipelines. Pipeline and pump equipment infrastructure to be routinely inspected daily.

Emission	Sources	Potential pathways	Proposed controls
			 Paste plant operational areas will be graded to guarantee any contaminated stormwater is directed to a designated collection area designed to contain a 1-in-100-year rainfall event. Return water ponds HDPE lined, contained within Catchment Area 1, and inspected at least once every 12-hours. Ponds are managed as per current works approval W6724/2022/1
Spills and leaks of hydrocarbon/reagents from paste plant infrastructure	Paste production and handling	Spillage of paste, direct discharge to land, release of reagents	 Hydrocarbons will be managed on site in accordance with Australian Standard 1940-2004: <i>The Storage and Handling of Flammable and Combustible Liquids</i>. Soil contaminated by hydrocarbons will either be treated in-situ or moved to a bioremediation area for treatment. Spill kits will be located at all hydrocarbon and chemical storages and will be carried on surface mobile equipment to ensure immediate clean-up of any spills of contaminants such as oil or fuel. Water contaminated with hydrocarbons will be directed to a closed-circuit water treatment system. Hydrocarbon wastes including oily rags, filters and waste oils will be collected and stored in bins, tanks or bunded pallets and disposed offsite by a licensed contractor.
Leaching of contaminants from paste	Paste deposition underground	Leaching into groundwater or soils	 Tailings quality assessed under W6724/2022/1. Cemented backfill to reduce the risk of leaching (addition of cement prevents excess pyrrhotite oxidisation of tailings). Monitoring of regional groundwater will continue at monitoring bore MB01 (or nearest monitoring bore to the paste plant).

3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded the applicant's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Table 2 below provides a summary of potential human and environmental receptors that may be impacted because of activities upon, or emission and discharges from the prescribed premises (*Guideline: Environmental Siting* (DWER 2020)).

 Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Historic town boundary	The abandoned Sir Samuel township is located adjacent to the premises.
Yakabindie Homestead	Approximately 7.5 km northwest from the paste plant.
Cultural and heritage receptors	Distance from prescribed activity
Aboriginal Heritage Inquiry System (AHIS) Registered Aboriginal Sites throughout	The Bellevue Gold project tenements are located within an area of high cultural heritage significance.
Project tenements.	A Native Title Agreement (NTA) exists between Golden Spur Pty Ltd parent company Bellevue Gold and Tjiwarl Aboriginal Corporation RNTBC.
	A co-designed Cultural Heritage Management Plan (CHMP) is to manage future activities.
	The applicant states that because of consultation with the Aboriginal Consultation Group and additional heritage work, heritage sites' locations and cultural values within the project area are well understood, and that the project footprint has been designed to avoid all know Aboriginal heritage sites.
	The delegated officer notes proposed infrastructure is located within already disturbed area.
Environmental receptors	Distance from prescribed activity
Violet Range (Perseverance Greenstone Belt) vegetation complexes (banded ironstone formation) – Priority Ecological Community (PEC) - Priority 1	Buffer zone for the PEC is present across the premises. The majority of the PEC within the proposed operational areas of the Bellevue Gold Operation is in a degraded state due to historic mining activities.
Yakabindie calcrete groundwater assemblage type on Carey palaeodrainage on Yakabindie Station – Priority Ecological Community - Priority 1	Approximately 1.6 km west of the paste plant.
Lake Miranda east calcrete groundwater assemblage types on Carey palaeodrainage on Yakabindie Station – Priority Ecological Community – Priority 1	Approximately 5 km south of the paste plant.
Underlying groundwater (non-potable purposes)	Fractured rock aquifer with water levels approximately 15 – 30 m below ground level. Salinity between 17,900

	mg/L and 90,400 mg/L total dissolved solids.
Lake Miranda Nearest	The centre of the processing plant is within 350 m of a flat playa that is connected to Lake Miranda. The Geocortex hydrography layer records this as a section of Lake Miranda itself. The storm water drain for the plant is on the shore of the playa.
Surface water drainage	The centre of the processing plant is within 350 m of a flat playa that leads via creeks to Lake Miranda. The storm water drain for the plant is on the shore of the playa.

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the delegated officer considers the applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the works approval as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

Works approval W6865/2023/1 that accompanies this decision report authorises construction and time-limited operations. The conditions in the issued works approval, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the premises i.e. Category 5 paste plant activities. A risk assessment for the operational phase has been included in this decision report, however licence conditions will not be finalised until the department assesses the licence application.

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Table 3: Risk assessment of potential emissions and discharges from the premises during construction, commissioning, and operation

Risk events					Risk rating ¹	Applicant	Conditions ²	
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood	controls sufficient?	of works approval	Justification for additional regulatory controls
Construction								
Construction of new Bellevue Gold Project past plant.	Dust	Air / windborne pathway causing impacts to health and amenity	Sir Samuel township AHIS Registered Aboriginal Sites throughout	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	N/A	The Delegated Officer notes that the construction period will be short, and the paste plant location is central to the operations and separate from vegetation
	Noise		prescribed premises. Undisturbed land and native vegetation	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	N/A	The Delegated Officer considers noise and dust impacts will remain low due to distance from receptors and short construction timeframes.
Commissioning								
Commissioning of Bellevue Gold Project past plant.	Dust generated during commissioning of the paste plant	Air / windborne pathway causing impacts to health and amenity	Sir Samuel township AHIS Registered Aboriginal Sites throughout prescribed premises. Undisturbed land and native vegetation	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	Condition 5	Dust suppression measures are to be undertaken during environmental commissioning of the paste plant.
	Spill, leak or seepage of return water or tailings from pipeline.	Spillage of tailing, direct discharge to land, release of reagents	Contamination of soil or groundwater	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 5	Spills of water, tailings chemicals or hydrocarbons to be contained and cleaned up immediately. Pipelines are bunded or contained in v-drains.
Operation (including	g time-limited-op	erations operations)	_			-		
Operation of the Bellevue Gold Project paste plant	Dust generated during paste	Air / windborne pathway causing impacts to health	Sir Samuel township AHIS Registered Aboriginal Sites	Refer to Section 3.1	C = Minor L = Unlikely	Y	Condition 10	Conditions related to the management of dust from paste plant operation are included in the works approval

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Risk events					Risk rating ¹	Angliagut	Conditions ²		
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood	controls sufficient?	of works approval	Justification for additional regulatory controls	
	plant operation	and amenity	throughout prescribed premises.		Medium Risk				
			Undisturbed land and native vegetation						
	Process water	Leaks from, or	Contamination of	Refer to	C = Minor		Condition 1, Condition 10	All pipelines associated with return water and tailings will be bunded or contained	
	production	water pipeline	soil or groundwater	Section 3.1	L = Unlikely Medium Risk			Condition 10	Condition 10
	Paste production and handling	Spillage of paste, direct discharge to land, release of reagents	Contamination of soil or groundwater	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 10	Conditions related to the storage and handling of reagents, as well as stormwater management are included in the works approval.	
	Paste deposition underground	Leaching of contaminants from paste	Contamination of groundwater	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	N/A	GSR conduct field water quality samples monthly as conditioned in existing licence L9259/2020/1	

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the Guideline: Risk Assessments (DWER 2020).

Note 2: Proposed applicant controls are depicted by standard text. Bold and underline text depicts additional regulatory controls imposed by department.

4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 9 February 2024	None received	N/A
Local Government Authority – Shire of Leonora advised of proposal on 12 February 2024	None received.	N/A
Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) advised of proposal 12 February 2024	Follow up 17 May 2024, amendment to MP Reg ID 122497 currently in final stages of assessment by DEMIRS. Amendment to MP Reg ID 122497 includes the proposed paste plant and associated activities.	The applicant is responsible for ensuring their operations (and any changes) are approved by DEMIRS under <i>the Mining Act 1978</i> .
Tjiwarl Aboriginal Corporation (TAC, or Tjiwarl AC) RNTBC advised of proposal on 12 February 2024	 Comment received from Chief Executive Officer Tjiwarl Aboriginal Corporation RNTBC on 8 March 2024, below. A Native Title Agreement (NTA) exists between Tjiwartl Aboriginal Corporation (TAC) and Golden Spur Resources (GSR) since 30 September 2022. Mining tenement M36/25 forms part of the Agreement Area. Under the Agreements Cultural Heritage Management Plan (CHMP), GSR must not carry out any activity within an "Exclusion Zone". The approximate vicinity of the proposed paste plant (according to supplied maps from the applicant and DWER) is straddled by areas classified as "Exclusion Zone" and "Culturally Sensitive Area". 	 Golden Spur Resources is responsible for ensuring their operations and activities comply with the requirements of the Native Title Act 1993 (Cth) and/or the Aboriginal Heritage Act 1972 (WA). The Delegated Officer notes the following information that was supplied with the works approval application. The applicant referenced the Native Title Agreement (NTA) with Tjiwarl Aboriginal Corporation RNTBC in their application to DWER. Golden Spur state that important cultural and heritage considerations have been included in the surface design and layout of the Bellevue Gold Project premises, that protect sensitive areas, and that the co-designed Cultural Heritage Management Plan (CHMP) is to manage future activities. Golden Spur consider the project area to be extensively and thoroughly surveyed for Aboriginal ethnographical and archaeological sites, and that the

	Before any work is to commence, Golden Spur must provide a Work Program containing all relevant information to TAC so that TAC can consider whether a heritage survey is required. If the location of the proposed paste plant has changed since the Agreement became binding, Golden Spur must provide this information in the Work Program.	 for construction between Bellevue and Tjiwarl includes the proposed paste plant area. Golden Spur state that, because of consultation with the Aboriginal Consultation Group and additional heritage survey work, heritage sites' locations and cultural values within the Bellevue Gold Project area are well understood, and that survey work and consultation have enabled Golden Spur to design the project footprint to avoid all known Aboriginal heritage sites.
		After receiving the comment from Tjiwarl Aboriginal Corporation, the Delegated Officer requested further clarity from the applicant, in regard to the requirements of the Cultural Heritage Management Plan' (CHMP), on 21 May 2024.
		The applicant reiterated that the Bellevue Gold Limited (BGL) / Tjiwarl Native Title Agreement and the CHMP sets out the requirements for the applicant to notify and seek permission when required for any works to be undertaken in all parts of the Agreement Area.
		A culturally sensitive area is defined in the agreement as – "A location or area within the Agreement Area that has, and will continue to have, Cultural and Heritage Value or Values for the Common Law Holders and which will require special and ongoing management processes, as identified by Tjiwarl AC in accordance with the traditional laws and customs of the Common Law Holders".
		The department notes that 'special and ongoing management processes' are not defined, but the applicant does not believe this excludes activity taking place in 'a location', but does requires special management provisions to be agreed between the parties prior to work commencing.
		The applicant believes the special management provisions have been met in this location. The paste plant location is in the "Bellevue Hills and Creeks Culturally Sensitive Area" which encompasses the majority of the Bellevue Gold Project. The applicant state they will continue to liaise and communicate with Tjiwarl AC regarding the paste plant works.
Applicant was provided with draft documents	Comments to the draft documents were received from the applicant on	The Delegated Officer agreed to the two changes to table 1 of the works approval as they additional specificity to the

	on 23 May 2024	5 June 2024. The comments requested some typographic and grammatical corrections to the decision report and works approval.	instrument and do not significantly increase risk to the environment.
			Figures 1 and 3 of the works approval have also been updated to the revised version.
		• Table 1, item 2, dot point 2; additional word "buried" to read "tailings will be buried , bunded or contained within" This addition is required because in some areas the pipelines will need to go under roads.	
		 Table 1, item 1, dot point 4; additional words "name plate" to read "name plate production rate of 120m³/hr." Deletion of word "maximum". 	
		The applicant also notes there has been a minor change in the positioning of the plant, the footprint of the area has therefore also increased slightly to ensure the paste plant infrastructure is within the approved footprint, Figures 1 and 3 of the works approval are required to be updated.	
		The applicant had no additional comments and with regards to the remainder of the comments period, it was requested that this be waived and that the works approval be issued as soon as is possible.	

5. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a works approval will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

References

- 1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
- 2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
- 3. DWER 2020, Guideline: Risk Assessments, Perth, Western Australia.
- 4. Golden Spur Resources Pty Ltd 2023, *Application form: Works Approval "Bellevue Gold Project paste plant*", West Perth, Western Australia.
- 5. MBS Environmental (MBS) 2021, *Material Characterisation Assessment. Prepared for Bellevue Gold Project*, West Perth, Western Australia.
- 6. RPM Advisory Services 2023, "Attachment 3B Works Approval Paste Plant" Golden Spur Resources Pty Ltd ADV-AU-00612, Perth, Western Australia.

7. RPM Advisory Services 2023, "Paste Plant Commissioning Plan" Golden Spur Resources Pty Ltd ADV-AU-00612, Perth, Western Australia.