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Consulting



ATLAS PROJECT

LICENCE AMENDMENT APPLICATION

SUPPORTING DOCUMENT

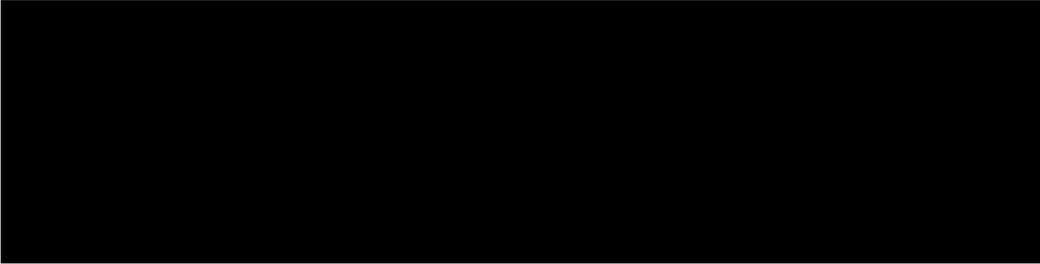
19 December 2025

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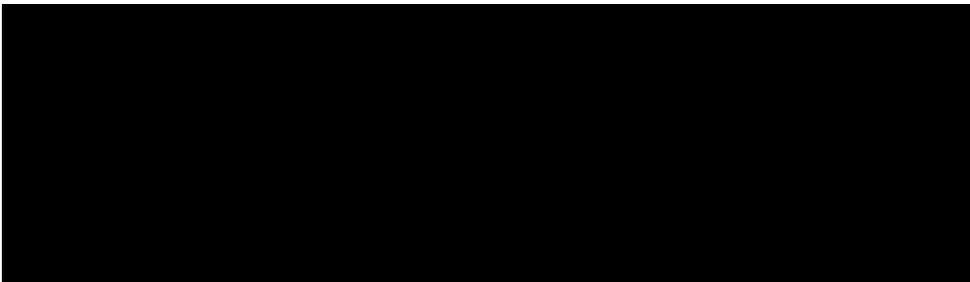
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ACKNOWLEDGEMENT OF COUNTRY

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INTRODUCTION

1.1 PURPOSE AND SCOPE

Image Resources NL (Image) is operating the Atlas Project (Proposal), a greenfields mineral sands mine located approximately 18 kilometres (km) east of Cervantes and 170 km north of Perth in the Wheatbelt region of Western Australia (WA). The Proposal includes the progressive development of mine pits, processing facilities, groundwater bores and water management infrastructure, temporary waste stockpiles, solar drying ponds and associated infrastructure (power supply, communications, workshop, laydown, offices, accommodation camp etc).

In September 2021, Image referred the Proposal to the EPA under Part IV of the *Environmental Protection Act 1986* (WA; EP Act) and was granted approval under Ministerial Statement (MS) 1220 on 22 May 2024. Image is currently planning a revision to the mine plan to extend the life of the Proposal by accessing area of the Atlas Resource further to the north. An application for a non-substantial amendment to MS 1220 via Section 45C under Part IV of the EP Act was submitted to the Environmental Protection Authority (EPA) on 25 November 2025 and is currently progressing through assessment. Figure 1 shows the revised compared to approved (under MS 1220) Development Envelopes and indicative Disturbance Footprint. Parallel processing of approvals is requested to minimise delays post approval of a revised MS 1220.

This Licence amendment application (Revised Proposal) is seeking to revise the prescribed premises boundary under L3014/2025/1 to include the new northern areas of mineral sands mining (see Attachment 3B: Proposed Activities

1.2 ATTACHMENTS

This Supporting Document includes the attachments as required by the Department of Water and Environmental Regulation (DWER) *Application form: Works Approval / Licence / Renewal / Amendment / Registration v16, August 2022* (DWER, 2022) (Form). As per the Form, the following attachments have been included in this Supporting Document to support the Application:

- Attachment 2 (Premises map);
- Attachment 3B (Proposed Activities);
- Attachment 5 (Other approvals and consultation documentation);
- Attachment 6A (Emissions and discharges);
- Attachment 7 (Siting and Location); and
- Attachment 10 (Proposed fee calculation).

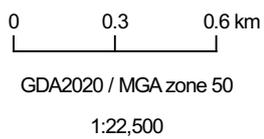
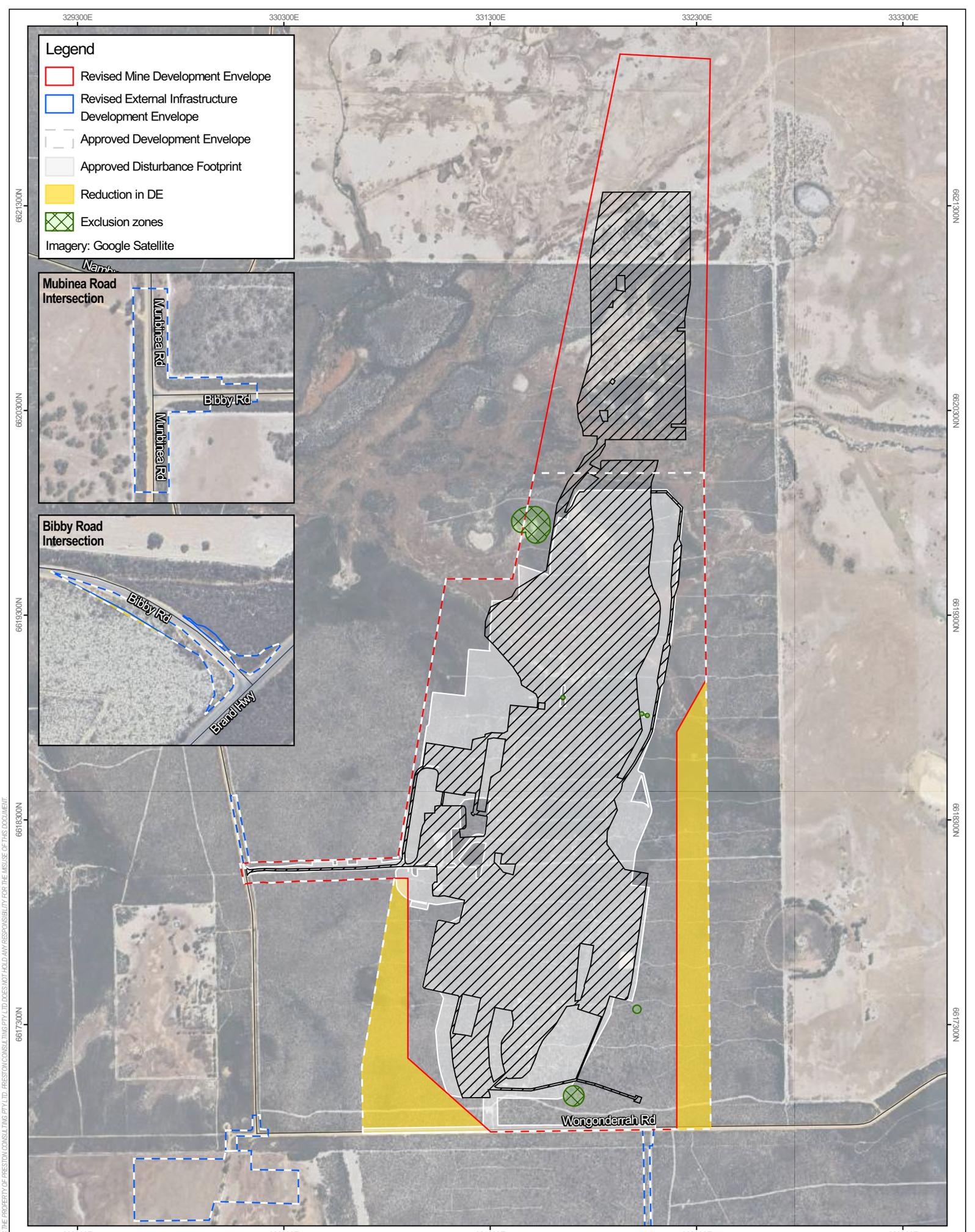
The Form advises that the following attachments are not required for this Application:

- Attachment 1A (Proof of occupier status);
- Attachment 1B (ASIC company extract);
- Attachment 1C (Authorisation to act as representative of the occupier);
- Attachments 3A, 3C and 3D (environmental commissioning, clearing and additional information);
- Attachment 4 (Marine surveys);



- Attachment 6B (Waste Acceptance);
- Attachment 8 (Additional information);
- Attachment 9: Category-specific checklist(s); and
- Attachment 11 (Request for exemption of publication).





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Figure 1: Revised Proposal amendments to MS 1220 as applied for under Section 45C

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ATTACHMENT 2: PREMISES MAP

Figure 2 contains an overview of the Proposal and location of the revised prescribed premises boundary.

Figure 3 contains the locations of infrastructure within the revised prescribed premises boundary.



330000E 331000E 332000E 333000E

Legend

 Prescribed Premises Boundary

 Indicative Disturbance Footprint

 Minor Roads (LGATE-195)

Imagery: Google Satellite

6621400N

6620400N

6619400N

6618400N

6617400N

6621400N

6620400N

6619400N

6618400N

6617400N

Munbrea Rd

Wongonderrah Rd

330000E 331000E 332000E 333000E

0 0.3 0.6 km

GDA2020 / MGA zone 50

1:22,500



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Figure 2: Revised premises boundary

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330000E

331000E

332000E

333000E

Legend

- Prescribed Premises
 - Approximate Earthen Bund Location
 - Site Layout**
 - Other Disturbance
 - Pit
 - Process Water Pond
 - Run of Mine Pad
 - SDP
 - WCP and HMC Pad
- Imagery: Google Satellite

6621400N

6621400N

6620400N

6620400N

6619400N

6619400N

6618400N

6618400N

6617400N

6617400N

330000E

331000E

332000E

333000E

0 0.3 0.6 km

GDA2020 / MGA zone 50

1:21,000



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Figure 3: Indicative locations of infrastructure within the revised prescribed premises boundary

ATTACHMENT 3B: Proposed Activities

3B.1 PRESCRIBED PREMISES CATEGORY

The Prescribed Premises categories as defined under Schedule 1 of the EP Regulations relevant to this Application are presented in Table 1.

Table 1: Prescribed premises categories and production details

Category Number and Description	Category capacity	Production Capacity	Expected throughput
8: Mineral sands mining or processing: premises on which mineral sands ore is mined, screened, separated or otherwise processed.	5,000 tonnes or more per year.	3.1 million tonnes of ore per year.	2.8 million tonnes per year

7.1 SCOPE OF PROPOSED ACTIVITIES

Image is currently planning a revision to the mine plan to extend the life of the Proposal by accessing area of the Atlas Resource further to the north. An application to amend MS 1220 via Section 45C under Part IV of the EP Act was submitted to the Environmental Protection Authority on 25 November 2025 and is currently progressing through assessment.

This Licence amendment application (Revised Proposal) is seeking to revise the Prescribed Premises boundary under L3014/2025/1 to include the new northern areas of mineral sands mining (see Figure 2) to align with the changes proposed in the Section 45C application. The proposed changes are limited to the inclusion of the northern mining areas and associated infrastructure. No changes to the mining method, infrastructure designs or locations of processing infrastructure are proposed.



ATTACHMENT 5: OTHER APPROVALS AND CONSULTATION

5.1 OTHER APPROVALS

Existing licences or permits issued for the Proposal that are relevant to this application are detailed below.

5.1.1 PART IV ENVIRONMENTAL PROTECTION ACT 1986

Part IV of the EP Act makes provisions for the EPA to undertake an Environmental Impact Assessment (EIA) of significant proposals, strategic proposals and land use planning schemes.

The EPA uses environmental principles, factors and associated objectives as the basis for assessing whether a proposal or land use planning scheme's impact on the environment is acceptable. The environmental principles, factors and objectives, therefore, underpin the EIA process.

The Proposal was referred to the EPA under Part IV of the EP Act on 3 September 2021, and the decision was made on 13 October 2021 to assess the Proposal at the level of Public Environmental Review (EPA Assessment No. 2311). The EPA published their assessment of the Proposal via EPA Report No. 1759 (EPA, 2024) on 13 March 2024. Implementation of the Proposal was approved on 22 May 2024 via MS 1220.

An application for a non-substantial amendment to MS 1220 via Section 45C under Part IV of the EP Act was submitted to EPA on 25 November 2025 and is currently progressing through assessment. Parallel processing of approvals is requested to minimise delays post approval of a revised MS 1220.

5.1.1 RIGHTS IN WATER AND IRRIGATION ACT 1914

A groundwater licence is required under the RIWI Act to undertake groundwater abstraction activities in WA. Image has obtained groundwater licences for the Proposal, with an allowable abstraction limit of 1.1 gegalitre (GL) per year from the Superficial aquifer (GWL210992), 2.2 GL per year from the Yarragadee Aquifer (GWL210993) and 50,000 kilolitre (kL) per year from the Eneabba aquifer for the mine camp (GWL210384). In addition, Image held a short-term licence for the abstraction of up to 50,000 kL per year from the Yarragadee aquifer for dust suppression and construction purposes (GWL210811).

Image has completed a site water balance that verifies that the Revised Proposal can be progressed without requiring any additional groundwater abstraction.

5.1.2 MINING ACT 1978

The Atlas Project Mining Proposal and Mine Closure Plan (MCP) (v1.3; REG ID 500648) were approved by the Department of Mines, Petroleum and Exploration (DMPE) on 5 August 2025.



A Mine Development and Closure Plan (MDCP) will be required to address amendments to key mining activities and the Activity Envelope to align with the Revised Proposal; however, due to the spatial redistribution of disturbance and minimal change to key mining activities (other than the pit), only minor amendments to the approved activities are required. The Revised Proposal represents a considerable reduction in environmental impacts in relation to the key environmental factors assessed for the Proposal and the spatial redistribution of disturbance does not introduce new or increased environmental risks.

Closure and rehabilitation planning relevant to the proposed changes will initially be addressed in the MDCP and will in turn be addressed in further detail in a revision of the MCP (required by April 2026). Approval of the amendments will be in the form of an Approvals Statement which will include DMPE's standard Environmental and Closure Outcomes (DMPE, 2025). The application of DMPE's standard outcomes will alter the specific wording of relevant approved outcomes; however, environmental and closure outcomes for the Revised Proposal are expected to remain consistent in principle. Management of the Revised Proposal under the Mining Act is therefore expected to remain consistent with the Environmental Outcomes approved under the Atlas Project Mining Proposal.

The MDCP will be submitted for assessment in parallel to the Section 45C Application and this Licence Amendment Application. The next revision of the MCP will be submitted prior to April 2026 unless otherwise agreed with DMPE.

5.1.2 EPBC Act

The Proposal was referred to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) on 17 September 2021. It was determined on 22 October 2021 that the following controlling provisions were relevant to the Proposal:

- Listed threatened species and communities (sections 18 & 18A); and
- Nuclear actions (sections 21 & 22A).

On 15 December 2021, it was decided that the Proposal was to be assessed as an accredited assessment under the EP Act, at the level of Public Environmental Review with six-week public review. On 17 July 2024, the final recommendation report was completed subsequently implementation of the Proposal was approved on 2 August 2024 via EPBC 2021/9056.

Image has submitted a request for variation of EPBC 2021/9056 to align with the changes proposed for MS 1220. The proposed variation is currently being assessed by DCCEEW.

5.2 STAKEHOLDER CONSULTATION

The following stakeholders have been consulted to-date or will be consulted with regarding the Revised Proposal:

- Commonwealth Government:
 - DCCEEW;
- State Government:
 - EPA Services;
 - DWER (Licencing and Water Licencing);
 - Department of Biodiversity, Conservation and Attractions (DBCA);



- DMPE;
- Other:
 - Shire of Dandaragan;
 - Private Landholders; and
 - Yued Aboriginal Corporation.
- This licence amendment application will be advertised for public comment as per DWER's standard procedure.



ATTACHMENT 6A: EMISSIONS AND DISCHARGE

Several sources of emissions and discharges associated with construction and operation were identified and assessed in the decision reports for L3014/2025/1 and W6831/2023/1 (DWER, 2025). These have been reviewed in relation to the proposed changes.

The proposed realignment of disturbance will change the location but not the nature or extent of some emission sources, primarily dust and noise, due to the construction and relocation of vehicles, machinery and normal operational activities. There is a sensitive receptor located 2 km northwest of the proposed extension (3121 Munbinea Road; Attachment 7.2). This receptor is now closer than in the previous configuration as mining within the revised prescribed premises will continue northward. Dust emissions will continue to be managed in accordance with conditions 6 and 8 of L3014/2025/1. Noise monitoring will continue to be conducted in accordance with condition 16 of L3014/2025/1 and mitigation, should monitoring identify any exceedance, will continue in accordance with condition 17 of L3014/2025/1.

The new sections of mining will require pipelines containing process water, sand tailings and clay fines to be aligned with the northern pit areas to maintain connection with existing processing facilities within the Prescribed Premises. Operational requirements for these pipelines are proposed to remain the same as currently conditioned in Table 1 of L3014/2025/1.

As per condition 5 of L3014/2025/1 Image will continue to ensure clean stormwater is diverted around operational areas and potentially contaminated stormwater is retained onsite using contour bunds and stormwater detention basins. For this purpose, the requirement for earthen bunding around the mine area will remain within approximate locations shown in Figure 3.

Figure 3 Acid Sulphate Soils (ASS) investigations for the Proposal initially included analysis of samples from the proposed new northern pit area. Potential ASS (PASS) risks are not expected to change from those assessed for L3014/2025/1 and management will continue in accordance with conditions 9 and 10 of L3014/2025/1 and monitoring in accordance with condition 13 of L3014/2025/1.



ATTACHMENT 7: SITING AND LOCATION

A significant amount of environmental baseline information has been collected for the Project throughout the Part IV EP Act and *Mining Act 1978* (WA) process. A summary of baseline information is provided below and details of the environmental impact assessment are provided in the Project's Environmental Review Document (ERD), available on the EPA website ([Atlas Project](#)).

7.1 LAND USE

The proposed northward extension of the prescribed premises remains within a predominantly rural setting characterised by agricultural land use, including grazing and cropping activities. The surrounding area is sparsely populated, with a limited number of rural residences and farmsteads, as identified in the sensitive receptor table. No conservation reserves or designated recreational areas are located within the immediate vicinity of the Revised Proposal. The land use pattern supports low-density activities, which reduces the potential for significant land-use conflicts. Nearby environmentally sensitive receptors and aspects.

The sensitive receptors and distance from premises is attached in Table 2 and the visual locations are seen in Figure 4.

The Revised Proposal introduces a change in the proximity of sensitive receptors due to the realignment of the prescribed premises further north. The only notable change is for 3121 Munbinea Road, which was previously located approximately 3.3 km northwest of the current licence premises boundary and mining area. Under the Revised Proposal, this receptor is now approximately 2.0 km northwest of the revised premises boundary and mining area. However, the closer proximity of the receptor at 3121 Munbinea Road, has been considered in the amendment, and mitigation measures in accordance with current L3014/2025/1 conditions for dust and noise will continue to be implemented to ensure compatibility with existing land uses and compliance with regulatory requirements.



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

Sensitive environmental receptors	Distance from the Premises
2269 Wongonderrah Road	1.3 km southwest of prescribed premises boundary 1.7 km southwest of mining area
3121 Munbinea Road	3.3 km northwest of current Licence premises boundary and mining area 2km northwest of the Revised Proposal premises boundary and mining area.
3700 Munbinea Road	300 m southwest of haul road 860 m west of premises boundary <i>(excluded due to not being occupied)</i>
3672 Munbinea Road	500 m southwest of haul road 850 m west of premises boundary <i>(excluded due to not being occupied)</i>
Nambung National Park	850 m west of the prescribed premises boundary. Visitor centre is about 10 km southwest of the prescribed premises boundary.



330000E

331500E

333000E

Legend

 Prescribed Premises Boundary

 Sensitive Receptors

 Minor Roads (LGATE-195)

Imagery: Google Satellite

#3121 Murbinea Road

Murbinea Rd

Farmhouse North

Farmhouse South

Wongonderrah Rd

#2269 Wongonderrah Road

330000E

331500E

333000E

0 0.5 1 km

GDA2020 / MGA zone 50

1:30,000



Project: ATL_0270_049
Date: 19/12/2025
Size: A4
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Figure 4: Sensitive Receptors in proximity to the revised prescribed premises

6622700N

6621200N

6619700N

6618200N

6616700N

6622700N

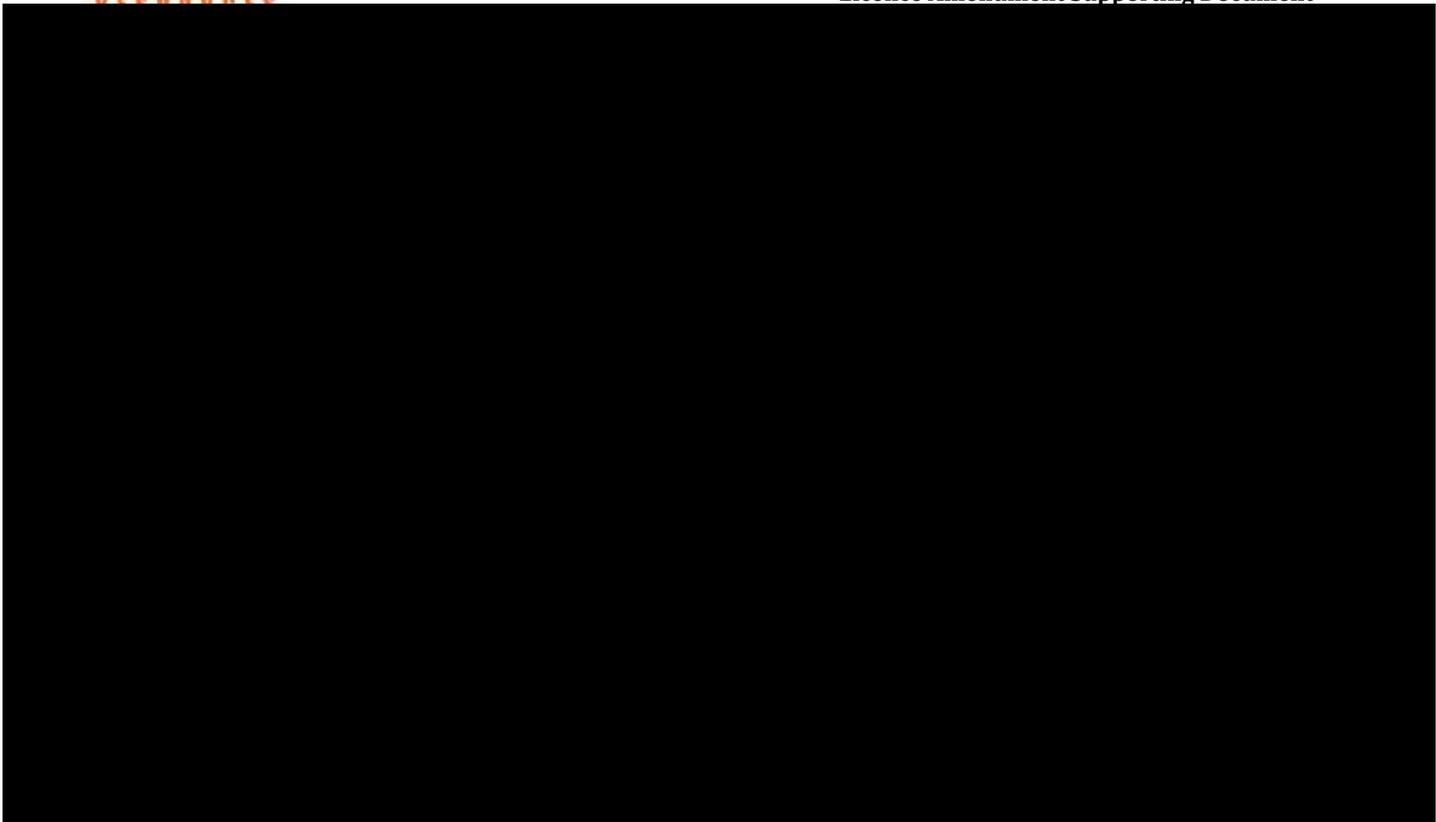
6621200N

6619700N

6618200N

6616700N

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GLOSSARY

Term	Definition
DBCA	Department of Biodiversity, Conservation and Attractions
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DMPE	Department of Mines, Petroleum and Exploration
DWER	Department of Water and Environmental Regulation
EIA	Environmental Impact Assessment
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EPA	Environmental Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>
ERD	Environmental Review Document
GL	Gigalitre
GWL	Groundwater Licence
Image	Image Resources NL
kL	Kilolitre
km	Kilometre
MCP	Mine Closure Plan
MDCP	Mining Development and Closure Proposal
Mining Act	<i>Mining Act 1978 (WA)</i>
MS	Ministerial Statement
PASS	Potentially Acid Sulfate Soils
Preston Consulting	Preston Consulting Pty Ltd
Revised Proposal	The amendment to L3014/2025/1 proposed in this document.
RIWI Act	Rights in Water and Irrigation Act 1914 (WA)
WA	Western Australia



REFERENCES

Department of Mines, Petroleum and Exploration (2025). *Mining Development and Closure Proposal and Approvals Statement Framework*. Available online from: [Mining Development and Closure Proposal and Approvals Statement Framework](#)

Department of Water and Environmental Regulation (2025). *Decision Report – Licence L3014/2025/1*. 06 November 2025. Available from: https://der.wa.gov.au/images/documents/our-work/licences-and-works-approvals/Decisions_/L3014/L3014%2006-11-2025%20DR.pdf [der.wa.gov.au]

Environmental Protection Authority (2024). *Assessment Report 1759 – Atlas Project, Image Resources NL*. Government of Western Australia, 7 March 2024. Available from: https://www.epa.wa.gov.au/sites/default/files/EPA_Report/Atlas_Project%20EPA%20assessment%20report.pdf

