# Focus Operations Pty Ltd

# Prescribed Premises L8249/2008/3 – Amendment Support Document

**To support amendments for:**

**Category 5 – Processing**

**Category 6 – Dewatering**

**Category 12 – Screening etc of material**

**Category 89 – Landfill**

## Coolgardie Gold Operations

## December 2025

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# 1 OWNERSHIP

The Coolgardie Gold Operation (CGO), inclusive of the L8249 Prescribed Premises, is operated by Focus Operations Pty Ltd (ACN 115 821 255), a wholly owned subsidiary of Focus Minerals Limited (ACN 005 470 799).

## 1.1 ATTACHMENT 1A – Proof of Occupier Status -

Mining tenements that form part of the Prescribed Premises L8249 appear in Table 1 below. Ownership is held by Focus Minerals Ltd and Focus Operations Pty Ltd. Rows with grey shading have not previously appeared within the Prescribed Premises. Tenement extracts that show ownership of the tenements appear attached as Appendix 1.

**Table 1: Tenements forming Prescribed Premises L8249**

| Tenement | Holder 1 | Holder 2 |
|---|---|---|
| G 15/7 | Focus Minerals Ltd | - |
| G 15/46 | Focus Minerals Ltd | - |
| L 15/95 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| L 15/161 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| L 15/459 | Focus Operations Pty Ltd | - |
| M 15/23 | Focus Minerals Ltd | - |
| M 15/150 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/154 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/237 | Focus Minerals Ltd | - |
| M 15/277 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/412 | Focus Minerals Ltd | - |
| M 15/595 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/630 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/645 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/646 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/660 | Focus Minerals Ltd | Focus Operations Pty Ltd |

| Tenement | Holder 1 | Holder 2 |
|---|---|---|
| M 15/827 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/877 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/958 | Focus Minerals Ltd | - |
| M 15/966 | Focus Minerals Ltd | - |
| M 15/1114 | Focus Minerals Ltd | - |
| M 15/1262 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/1293 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/1294 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/1432 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/1433 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/1434 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/1461 | Focus Minerals Ltd | Focus Operations Pty Ltd |
| M 15/1788 | Focus Minerals Ltd | Focus Operations Pty Ltd |

# 2 PREMISES MAPS – ATTACHMENT 2

## 2.1 Prescribed Premises Boundary

A minor modification to the prescribed premises boundary is proposed, in accordance with the boundary proposed in Works Approval W6888. This incorporates M15/277 into the premises boundary. This was mistakenly left out of the previous licence amendment (2025). Additional tenements have been added to the Prescribed Premises where activities are proposed or likely to cross tenement boundaries or where tenements are wholly surrounded by the Prescribed Premises.

Figure 1 shows the existing L8249 Premises tenements and the proposed additional tenure. This relates to the shapefile supplied electronically with this application.

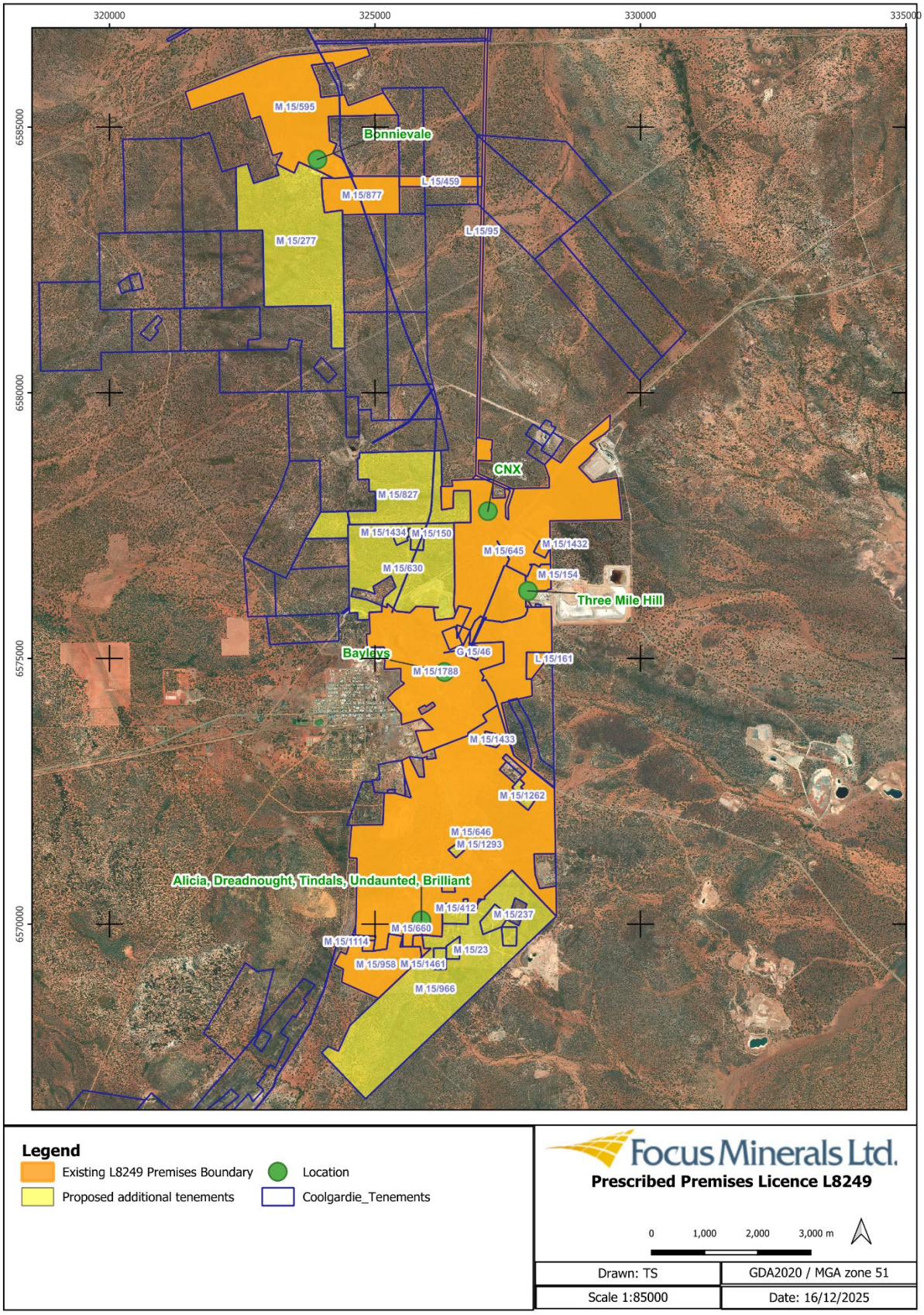



**Figure 1: Proposed Prescribed Premises Boundary L8429**

# 3 PROPOSED ACTIVITIES – ATTACHMENT 3B

## 3.1 Category 5 – Three Mile Hill processing plant

### 3.1.1 Increasing approved throughput to 1.8 million tonnes

Focus is seeking to increase the approved throughput of the Three Mile Hill gold processing plant from 1.5 million tonnes per annum (mtpa) up to 1.8 mtpa (see location marker on Figure 1).

No significant new infrastructure is proposed; the increase in throughput will be achieved through improved operational stability, targeted reliability improvements and minor de-bottlenecking within the existing plant footprint.

These measures focus on asset up-time, process stability and better utilisation of existing capacity, rather than large-scale plant modifications.

Key initiatives include:

- **Increased mill utilisation through improved ROM supply** – Forward plans into 2026 ensure uninterrupted ore supply. An upgrade to the front-of-plant reclaim capacity will enable a larger stockpile, decoupling the crusher from the mill and reducing unplanned stoppages while allowing more effective crusher maintenance
- **Critical sustaining capital for crusher reliability** – Replacement of the existing product screen and ROM bin with modern equivalents to improve up-time and performance.
- **Improved blending flexibility** – Introduction of an oxide blend and softer ore from various deposits at the Project has increased mill throughput without additional mill power. This allows more rapid processing with the same energy inputs.
- **Gold room enhancements within existing footprint** – Increasing electrowinning cell capacity by adding anodes and cathodes and installing a third, smaller electrowinning cell.
- **Leaching optimisation** – Installation of a second oxygen pump into the existing leach tank 2 to maintain leach kinetics and recovery despite reduced residence time from higher throughput.
- **Laboratory capability uplift** – Refurbishment to improve process diagnostics, reduce gold losses, and support stable higher-throughput operations.
- **Water security initiatives** – Additional water supply from existing borefields and pit dewatering, integrated into a networked approach. Implementation of in-pit tailings deposition to improve water reclaim efficiency (Greenfields in-pit TSF).
- **Crusher downtime reduction** – Pre-treatment of ROM feed to remove tramp metal and minimise crusher blockages.
- **Targeted upgrades within the current plant footprint**
    - Elution and gold room capacity increase from 2.4t to 6t.
    - Larger trash screen to accommodate higher oxide ore feed.
    - Larger gravity screen to improve gravity gold recovery.

A layout of the processing plant is annotated with proposed modifications in Figure 2.

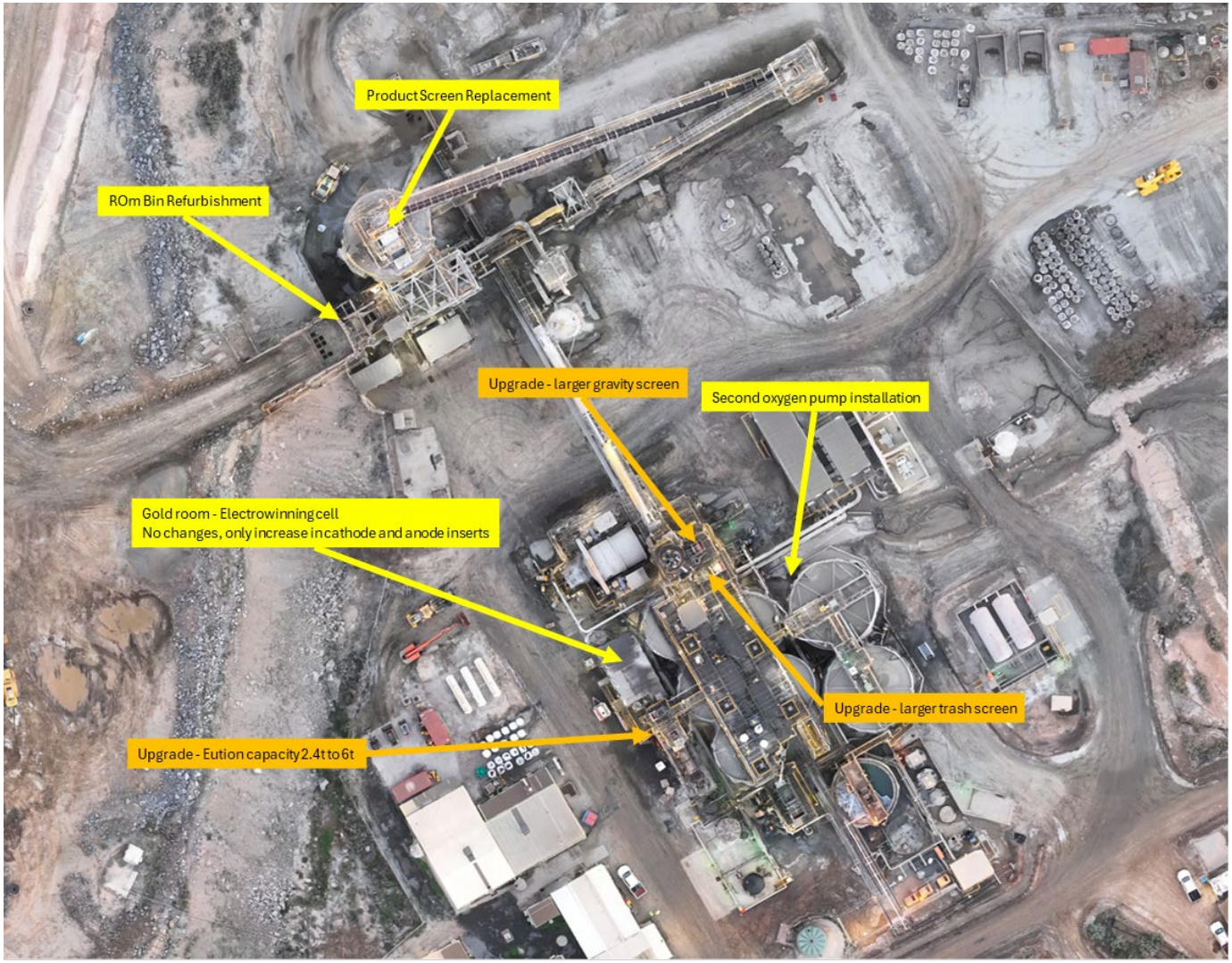



**Figure 2: Processing plant with annotations of proposed modifications**

The processing plant has demonstrated sustained operation at 200 dry tonnes per hour (dtph) - see Figure 3. The 2026 target is 200–210 dtph at 93% utilisation. The focus is on maintaining the demonstrated capacity through sustaining capital investment, targeted small-scale debottlenecking, and reliability improvements, while de-risking the gold recovery circuit to handle higher grades and volumes safely and efficiently.

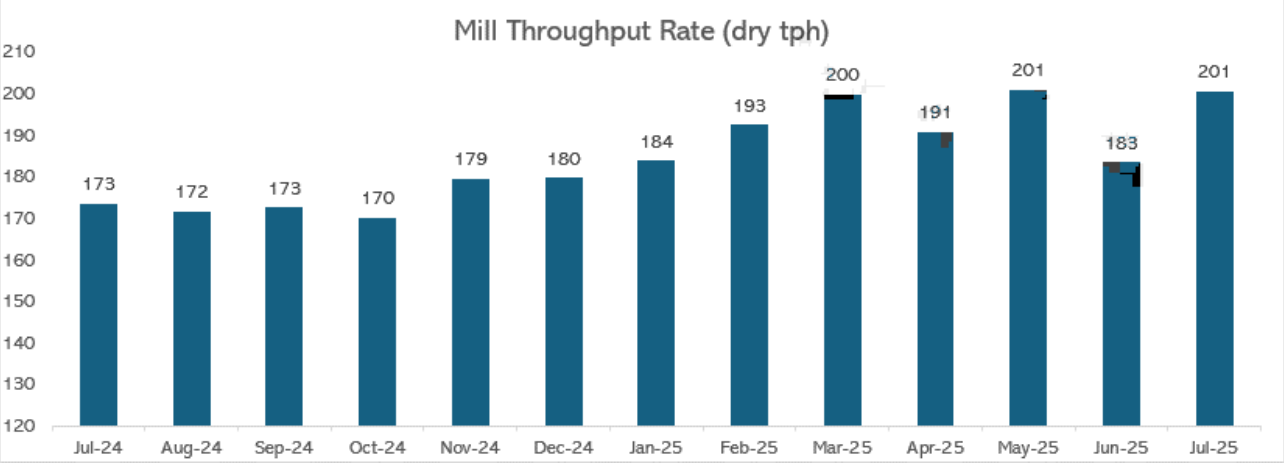



**Figure 3: Monthly throughput at Three Mile Hill processing plant**

The proposed throughput increase will not result in any material change to the type or nature of environmental emissions or discharges from the operation. All changes are proportional to the higher tonnage and will be managed within existing infrastructure, strategies, and operating parameters.

No new discharge points, emission types, or material process changes are introduced.

- **Power supply** – No change to instantaneous power demand or mill electrical supply requirements.
- **Tailings** – Increase in deposition rate from 1.5 mtpa to 1.8 mtpa within the existing tailings strategy; no change to deposition method. Filling rate will increase in line with planned AGTSF raises.
- **Reagents** – Usage increases proportionally (~13%) in milling and CIL, consistent with higher tonnage.
- **LPG and potable water** – Increases of ~20–40%, dependent on gold ounces produced.
- **Process water** – ~13% increase in consumption, with at least 50% returned via existing TSF water recovery.
- **Maintenance** – Minor increase in routine maintenance activity; no significant change expected due to lower ore abrasiveness.

### 3.1.2 Processing historic tailings and vat leach stockpiles from within the L8249 premises

Mining has been undertaken in proximity of the premises since the late 1800's resulting in multiple legacy disturbances. As a part of the mining schedule, Focus is seeking to reclaim and process historic tailings and vat leach stockpiles from within the L8249 premises. These stockpiles have been sampled and multi-element analysis performed, which show they have sufficient gold resources to be used to supplement higher grade ore feed from approved mining operations.

Within the landscape, the historic stockpiled material appears in structures that have been subject to many years of weathering and other human intervention (machinery and vehicle movements on or about the structures/stockpiles). Much of the material within the stockpiles is fine-grained and subject to dispersion by the weathering and human intervention. Stockpiles are listed below in Table 2.

**Table 2: Historic stockpiles to be reclaimed and processed**

| Map ID | Name | Description | Volume ($m^3$) | Tonnes | Area (ha) |
|---|---|---|---|---|---|
| 1 | Perseverance | Historic tailings and heap leach pad | 11,000 | 20,000 | ~2.08 |
| 2 | Lady Loch | Historic tailings | 26,000 | 48,000 | ~1.85 |
| 3 | Dreadnought | Historic tailings | 16,000 | 26,000 | ~2.8 |
| 4 | Redemption | Historic tailings/ heap leach pad | 7,000 | 12,700 | ~0.32 |
| 5 | Golden Bar | Historic tailings | 13,200 | 23,750 | ~0.6 |

At present the classification of Map IDs 1-4 is *possibly contaminated – investigation required* (see letter attached as Appendix 2). This classification was determined after submission of the results from the preliminary site investigation – appearing as Appendix 3. Site 5 has yet to be investigated.

Metal concentrations within the stockpiles are elevated, reflected in the analysis appearing in Appendix 3. The benefit of reclaiming the stockpiles is to remove environmentally sensitive material from the landscape (removing and processing at Three Mile processing plant) and then securely store the waste in an approved tailings storage facility (Greenfields in-pit tailings storage facility).

Further soil and groundwater investigations are required to establish the nature and extent of contamination at the sites in accordance with the requirements of the *Contaminated Sites Act 2003,* associated regulations and guidelines. Removal of these stockpiles will facilitate further investigation by providing more ready access to soils/groundwater below the stockpile locations. Locations appear in Figure 4 below.

Stockpiles will be detailed in the forthcoming Mining Development and Closure Proposal to seek approval from the Department of Mines, Petroleum and Exploration to take and process materials under the *Mining Act 1978*.

Tailings from historic stockpile processing will be directed to the Greenfields in-pit tailings storage facility, which will have been operating for approximately 12 months prior to processing of historic stockpiles. This provides a significant volume of tailings to buffer any potential contaminant loads that may occur from the historic stockpiles, combined with a permeability of ~$10^{-7}$ m/s, creates low risk of contaminants seeping to groundwater. The total tonnage appearing in Table 2 (130,450 tonnes) equates to approximately 8.7 percent of annual processing throughput at 1.5 mtpa or approximately 7.3 percent of annual processing at the proposed throughput at 1.8 mtpa. The historic stockpile tailings constitute less than two percent (2%) of total tailings containment volume of Greenfields in-pit TSF (6,750,000 tonnes).

Monitoring of groundwater will be maintained throughout the operation of the Greenfields in-pit TSF from monitoring bores IPTSFMB1, IPTSFMB2, and IPTSFMB3, in accordance with Condition 33, Table 13 of the existing L8249 licence.

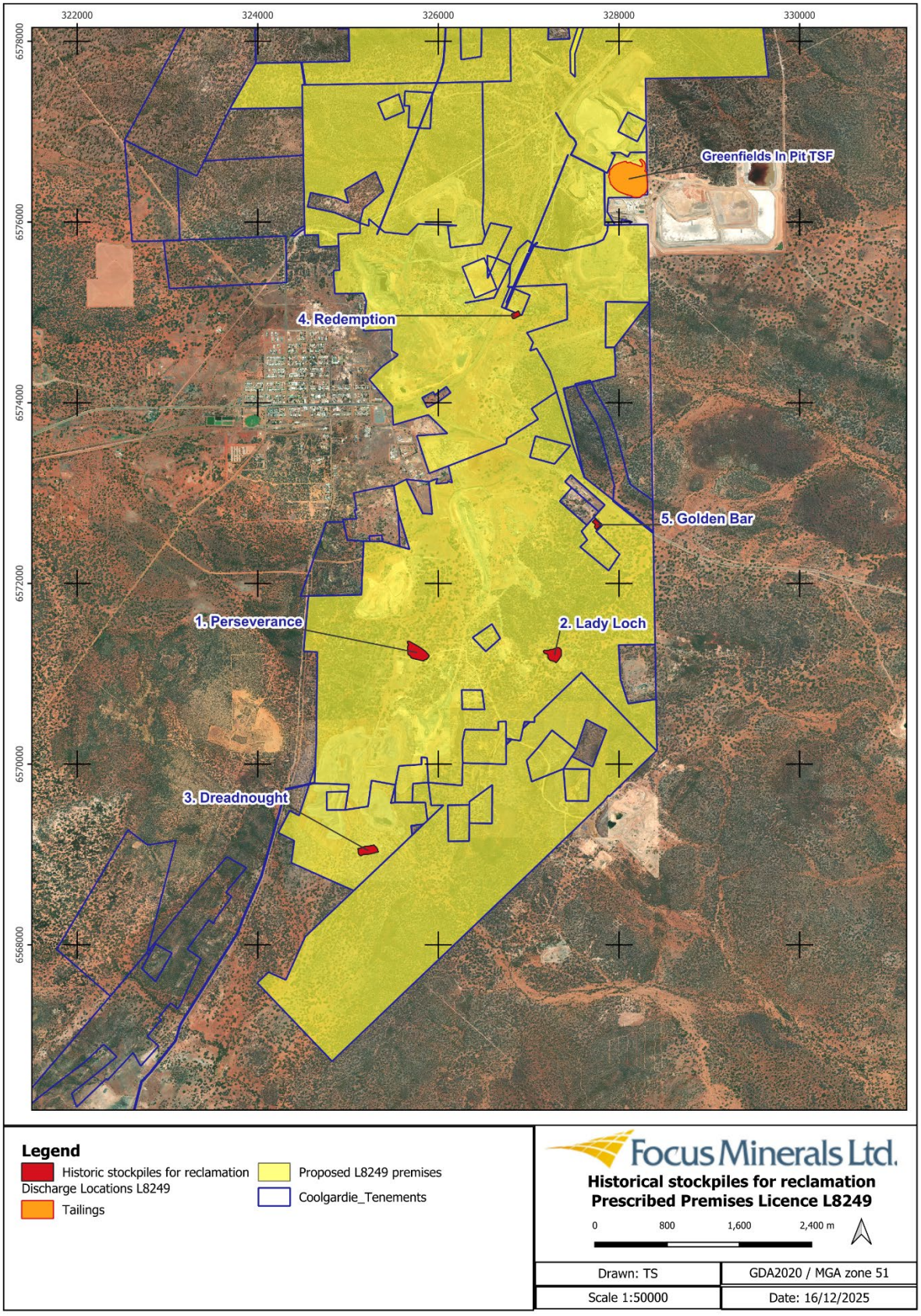



**Figure 4: Historic stockpiles for reclamation**

### 3.1.3 Toll treating

Focus is seeking approval to toll treat ores from third party, small-scale campaign mining. This would be undertaken to fill gaps in any scheduled ore processing at the Coolgardie operations.

Ores would be considered for toll treating subject to a risk assessment process. Assessment of risk is to be based on the following:

- Is ore derived from a *Mining Act 1978* approved operation (Mining Proposal, Mining Development and Closure Proposal or POW).
- Has an ore/ metallurgical test-work/ tailings characterisation been completed.
- What is the total volume of expected tailings and what is their percentage of annual deposition – (risk levels <5% low, 5-10% Medium, > 10% high).
- Is there deleterious materials within the tailings (potentially acid forming, potentially fibrous, naturally occurring radioactive or saline materials).

Focus will implement a procedure to track the aspects considered above and will only consider toll treatment of ores where potential adverse environmental impacts are not identified.

### 3.1.4 Gravity dam added as containment for tailings decant return/process water

At present the Gravity dam is listed in Table 2 of L8249 (page 4).

Focus seeks to add Process water to the list of materials as it would optimise management of water quality to ***send the tailings decant water*** (from the Greenfields in-pit TSF) ***to the Gravity dam*** for blending with the existing water sources. At present, all the gravity dam water is used for processing activities.

There is no physical pathway for water in the Gravity dam to interact with water sources other than the process pond. The water cannot be reticulated to the Bayleys or Bonnievale water sources. The Gravity dam has existing HDPE lining with a permeability of $10^{-9}$ m/s. Focus would add the infrastructure requirement of maintaining a minimal operational freeboard of 500 mm.

Focus would seek that the Gravity dam description in Table 2 of L8429 be amended to the following (changes highlighted).

| Containment cell or dam | Material | Infrastructure requirements |
|---|---|---|
| Gravity dam | • Underground mine dewater<br>• Mine dewater<br>• Borefield water<br>• Process/ tailings decant water | • Lined with HDPE liner to achieve a permeability of $10^{-9}$ m/s<br>• A minimal operational freeboard of 500 mm to be maintained |

## 3.2 Category 6 – Increase in total dewatering volume

### 3.2.1 Volume increase relating to Works Approval completion

Focus is seeking to increase the total approved dewatering volume at the L8249 premises from 475,000 tonnes per annum (tpa) up to 950,000 tpa.

The proposed increase is due to the concurrent mining and dewatering of multiple deposits.

Works Approval W6899 at Bonnievale sought dewatering of 475,000 tonnes, as did the Alicia/Dreadnought centred Works Approval W6967. Coupled with the existing dewatering authorised for other locations (see Table 3), the increase to 950,000 tpa will enable dewatering at multiple locations at the same time.

**Table 3: History of licence amendments highlighting dewatering changes**

| Instrument | Issued | Description |
|---|---|---|
| L8249/2008/1 | 25/09/2008 | New application |
| L8249/2008/1 | 14/01/2010 | Licence amendment to increase dewatering capacity |
| L8249/2008/1 | 20/12/2012 | Licence amendment to included used tyre disposal conditions and groundwater levels and recovery plan conditions |
| L8249/2008/2 | 27/09/2013 | Licence reissue |
| L8249/2008/2 | 21/11/2013 | Licence amendment |
| L8249/2008/2 | 11/06/2015 | Licence amendment to REFIRE format, to include the discharge from TMHWMB-5 to CNX pit and to change reporting month from September to August |
| L8249/2008/2 | 19/11/2020 | The department-initiated licence amendment to rectify for Mining Tenement record M15/1114 and to update a site map. The Schedule 2: Reporting & notification forms and Annual audit compliance report proforma sections containing information were also deleted |
| L8249/2008/3 | 12/09/2022 | Licence amendment to:<br>• Extend expiry date;<br>• Addition of mining tenement M15/1788 and miscellaneous tenement L15/161 to premises boundary;<br>• New dewatering infrastructure from Greenfields Pit; and<br>• New mine dewatering discharge locations |
| L8249/2008/3 | 06/07/2023 | Licence amendment for construction and operation of a pipeline route from Lindsays pit to Bayleys dam for temporary dewatering of Lindsays pit (approximately 105,000KL) to provide additional water to the TMH Processing Plan to supplement its startup |
| L8249/2008/3 | 10/08/2023 | Licence amendment to:<br>• Increase throughput capacity for category 89: Putrescible landfill site and;<br>• Add the construction and operation of Tindal's landfill |
| L8249/2008/3 | 03/11/2023 | Licence amendment to allow the reprocessing of tailings from Bonnievale (off site) |
| L8249/2008/3 | 30/05/2024 | Licence amendment to:<br>• Increase the embankment height at the existing TMH TSF by an additional 6 metres to RL428m (Stage 3); and<br>• Construction and operation of the Greenfields In-Pit TSF. |
| L8249/2008/3 | 14/10/2025 | Licence amendment to:<br>• Operation of dewatering pipelines<br>• Operation of Water Ponds and Dams<br>• Operation and/or relocation of landfills<br>• Amendment to monitoring bores<br>• Installation of standpipes |

### 3.2.2 Additional dewatering discharge locations

***Big Blow open pit***

Focus is seeking to add Big Blow open pit as a dewatering discharge location. Big Blow has a capacity of ~782,000 kilolitres (kL). Big Blow was mined circa 2023 with mineralisation predominantly hosted by a sub-vertical to steeply east-dipping 10-20m wide fault zone and associated breccia within the Burbanks Basalt.

Volcaniclastic rocks such as the Burbank Basalt make for a poor typically fractured rock aquifer so groundwater flow will be slow and storage small (AquaGeo 2022). The low permeability of the basalt will make it unlikely that dewatering will have detrimental effects on any other groundwater user or environmental receptors.

Big Blow open pit is being sought as a part of wider Project reticulation option to contain dewater as an option should other discharge locations become unsuitable or unavailable.

The pipeline to Big Blow would T into the existing/approved pipeline to Brilliant open pit. Any new extent of pipeline is to be contained within V trenches with pressure sensing and shut-off valves to significantly reduce potential for undetected leaks. Pipeline corridors also contain scour pits which are designed to contain leaks should they occur.

***Empress open pit***

Focus is seeking to add Empress open pit as a dewatering discharge location. Empress pit is adjacent to the Alicia open pit that is currently being mined.

Dewatering Alicia and Dreadnought open pits had previously been approved under Works Approval W6967. It is now operationally clear that adding Empress open pit as a discharge location would allow greater flexibility in managing the Alicia dewatering and subsequent dust suppression.

The water used for dust suppression is used adjacent to the mining activities (at Alicia) and storing it in Empress pit reduces the requirement to pump it 2.3 kilometres to the Brilliant open pit. Focus would retain Brilliant open pit as a part of the reticulation to enable use as required.

Anywhere that the pipeline falls outside of the immediate pit catchments, the pipeline is to be contained within V trenches with pressure sensing and shut-off valves to significantly reduce potential for undetected leaks and pipeline corridors are to contain scour pits which are designed to contain leaks should they occur.

Figure 5 shows dewatering discharge points including the proposed Big Blow pit and Empress pit locations.

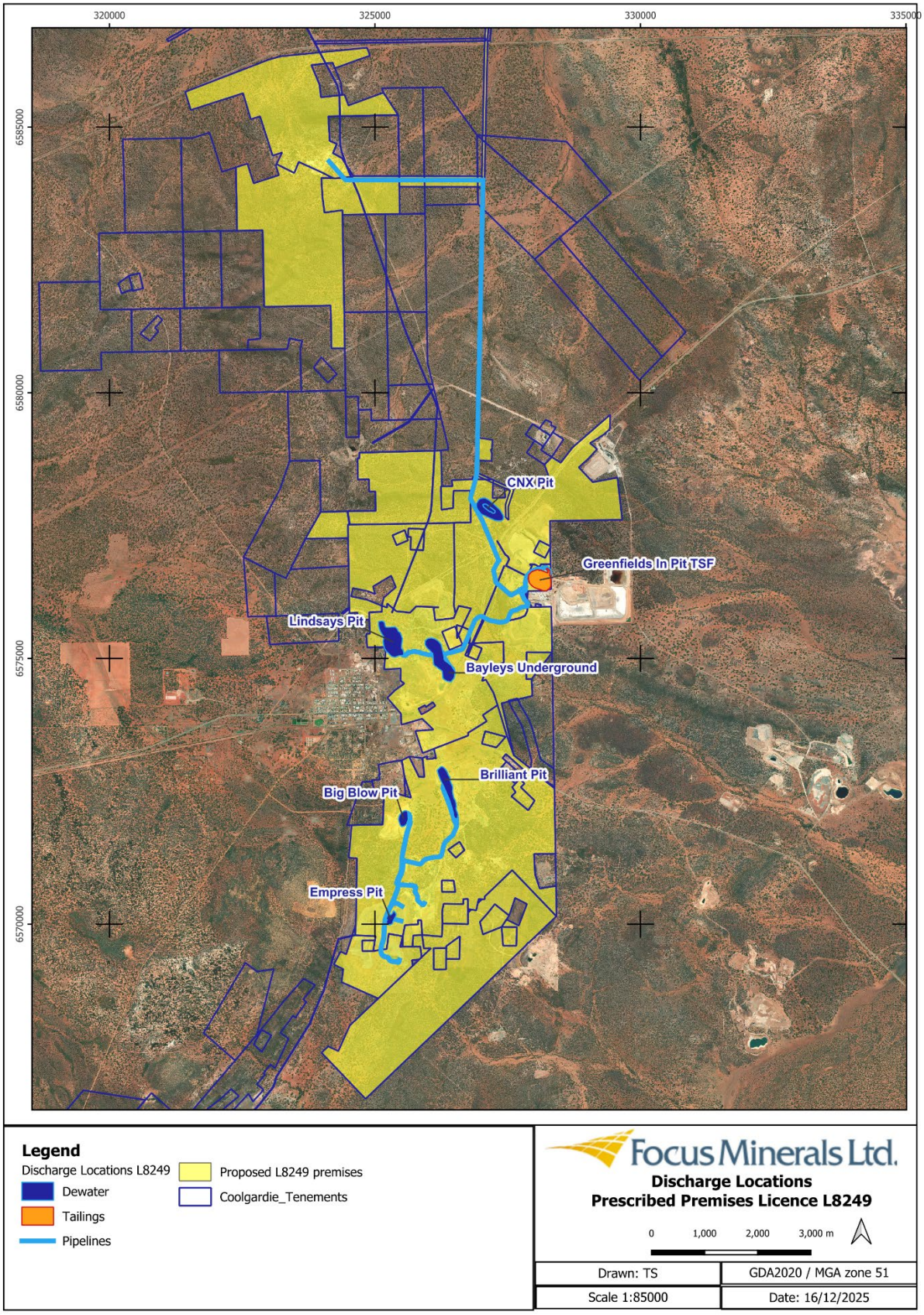



**Figure 5: Discharge Points**

## 3.3 Category 12 – Increase in screening etc. throughput and additional locations

Category 12 activities have been approved and constructed under Works Approvals W6888/2024/1 (at Bonnievale) and W6967/2024/1 (at Three Mile Hill including Big Blow/ Alicia/ Dreadnought).

Each Works Approval application sought throughput of 100,000 tpa. Due to concurrent mining activities across the premises a total of 200,000 tpa throughput is sought.

The activity produces road base which is vital for constructing and maintaining hardstands and roads which minimise dust generation. Another product produced by the activity is stemming material, which is used to backfill drill holes prior to the blast phase of 'drill and blast' mining operations. Stemming material is fundamental in reducing noise generation from blasting.

Focus is seeking to extend the area of operation of these mobile crushing/screening units to ensure most efficient siting and location of the activity as appearing in Figure 6.

This incorporates a new primary mobile crush and screen location at Greenfields waste rock landform laydown and an additional location at the proposed Dreadnought ROM.

These locations are sought to enable crushing as close as possible to source material and to reduce vehicle movements in transporting the material.

All existing management related to the category 12 activity would be maintained - namely:

- Plant to be maintained in accordance with manufactures specifications;
- Operation of screening to be limited to daylight hours to avoid night-time noise emissions;
- Crusher feed must be wetted down prior to the crushing process to minimise dust emission;
- A water cart must be present at all times during operation to manage dust emissions;
- Bunding to divert stormwater around and contain stormwater within the crush/screen locations.

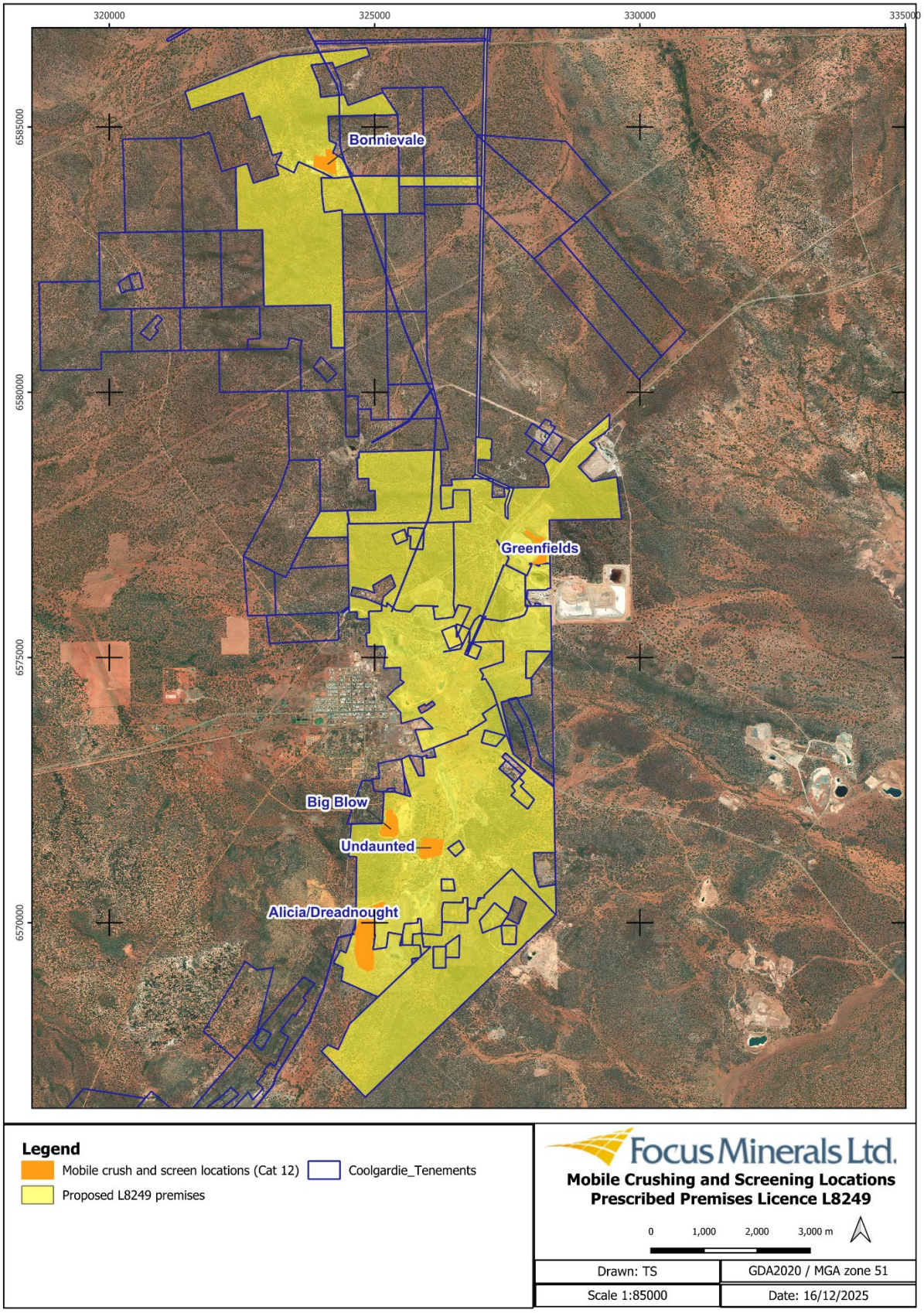



**Figure 6: Category 12 mobile screening etc. of raw materials**

## 3.4 Category 89 – Increase in landfill deposition and additional landfill site

Focus is seeking to increase the total deposition under the landfill category 89 activity from the approved 200 tonnes per annum (tpa) to 4,750 tpa. The increase is associated with concurrent mining at multiple deposits and the landfills at these locations.

This amendment seeks to add another landfill location to the premises, with a landfill at the Three Mile Hill South waste rock landform location appearing on Figure 7. This location is elevated within the landscape on the waste dump at approximately 10 metres above the surrounding topography. Being elevated within the waste dump ensures that the location is greater than 3 metres above the closest groundwater.

The landfills will only take waste in accordance with the *Landfill Waste Classification and Waste Definitions 1996*; classified as a Class II landfill that is permitted to accept waste for disposal as appearing in Table 4.

**Table 4: Focus landfill class and permitted waste types**

| Landfill class | Common name | Waste types permitted for disposal | Focus landfills |
|---|---|---|---|
| Class II (Prescribed Premises Category 89) | Putrescible landfill | • Clean Fill<br>• Inert Waste Type 1<br>• Putrescible Wastes | Greenfields landfill<br>Bonnievale south landfill<br>Dreadnought landfill<br>Tindals landfill<br>Three Mile Hill proposed landfill |
| | | • Contaminated solid waste meeting waste acceptance criteria specified for Class II landfills (where authorised under an Environmental Protection Act licence) | NA |
| | | • Inert Waste Type 2 (where authorised under an Environmental Protection Act licence) | Tyre disposal up to 2,000 per annum approved for disposal at Dreadnought landfill.<br>***Seeking approval for disposal of conveyor rubber of up to 20 tonnes per annum (at either of Greenfields landfill or Three Mile Hill landfill)***<br>***Seeking approval for disposal of up to 500 tyres per annum at Bonnievale south landfill.*** |
| | | • Special Wastes Type 1, Type 2 and Type 3 (where authorised under an Environmental Protection Act licence) | Example of **Special waste type 1** - Asbestos fibre and dust waste (e.g. dust resulting from the removal of thermal or acoustic insulating materials or from processes involving asbestos material, and dust from ventilation collection systems).<br>***Seeking approval for disposal of personal protective equipment associated with handling of potential fibrous waste rock material (naturally occurring asbestos) at Greenfields, Bonnievale south and Dreadnought landfills.*** |

The waste deposition approved for each of the landfills is displayed in Table 5. The tonnage sought under this licence amendment appears in the far-right column of Table 5.

**Table 5: Landfill approved and proposed deposition**

| Location | Tonnage Approved (Tonnes per annum) | Instrument (Licence or Works Approval) | Tonnage Sought under this licence amendment (Tonnes per annum) |
|---|---|---|---|
| Greenfields landfill | 200 | L8249/2008/3 | 250 |
| Dreadnought landfill | | | 2,000 |
| Tindals landfill | | | 250 |
| Bonnievale south landfill | 200 | W6888/2024/1 | 2,000 |
| Three Mile Hill landfill | NA | This licence amendment application | 250 |
| | | **Total** | **4,750** |

All landfills will be operated in accordance with the following controls:

- Windblown waste to be collected weekly and returned to landfill.
- The perimeter bund to be installed to the height of a dumped load of waste rock (1.8 - 2 m high).
- Tipping area is restricted to less than 20 metres in length.
- Landfill is not within 100 metres of a surface water feature.
- Base of the landfill is at least 3 metres above groundwater level.
- Bunds around perimeter of landfill area in accordance with application to prevent ingress of surface water to landfill trenches.
- Windrows/bunding maintained to divert stormwater around the landfill cells to be maintained.

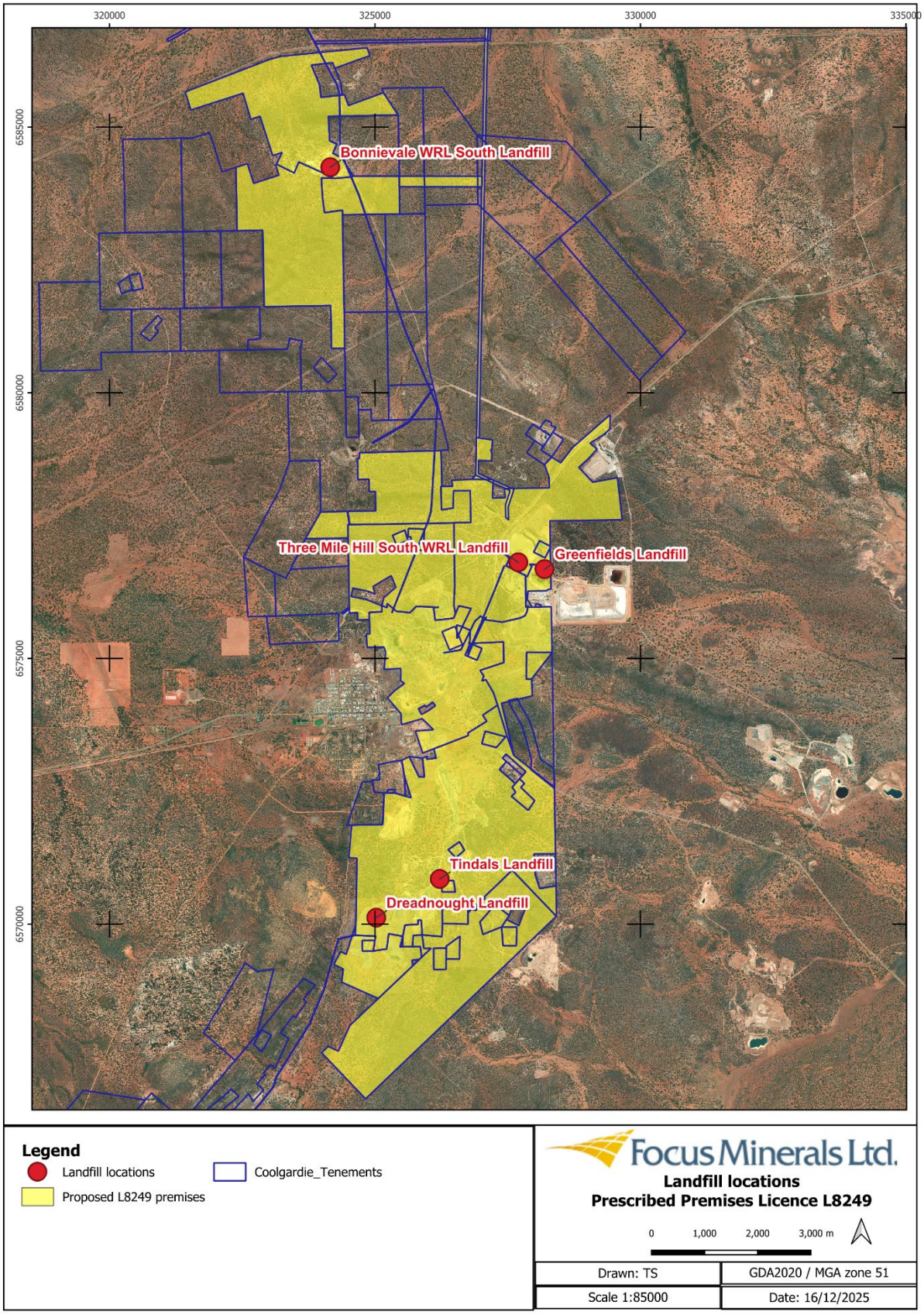



**Figure 7: Landfill locations**

## 3.5 Other activities

### 3.5.1 Washdown bays, oily water separators and refuse drying pads within WRLs

Focus is seeking to establish washdown bays at each of the operational mining centres, to maintain vehicle hygiene and prevent spread of soil and plant material. The mining centres include:

- Bonnievale;
- CNX;
- Three Mile Hill;
- Alicia/Dreadnought/Undaunted

Each washdown bay is to be constructed generally in accordance with the layout presented in Figure 8. The wash-bay is to be established on an impermeable surface, either concrete or modular steel/aluminium trays. The sides are built to a height of approximately 300 mm to retain water within the bay. Washdown water flows to a graded sump within the compound where it is pumped to an oily water separator. Oily waste-water is directed to an IBC for off-site disposal by accredited contractors, while reclaimed (treated) water is directed to tanks for later use in dust suppression via water carts – filled at a standpipe, a short distance from the tanks. The water for use in dust suppression is to be monitored quarterly to ensure total petroleum hydrocarbons are < 15 mg/L.

Refuse (soil/rock) will be excavated from the bays and sump. This is to be transported to waste rock landforms (WRL) where it will be dried within a constructed pad – construction design appearing in Figure 9. The drying cells will retain a perimeter bund up to 1 metre in height to prevent water ingress or egress. The drying cells will be constructed of compacted waste rock. Upon drying materials may be enclosed within the WRL landform or used for fill material to cover waste at landfills.

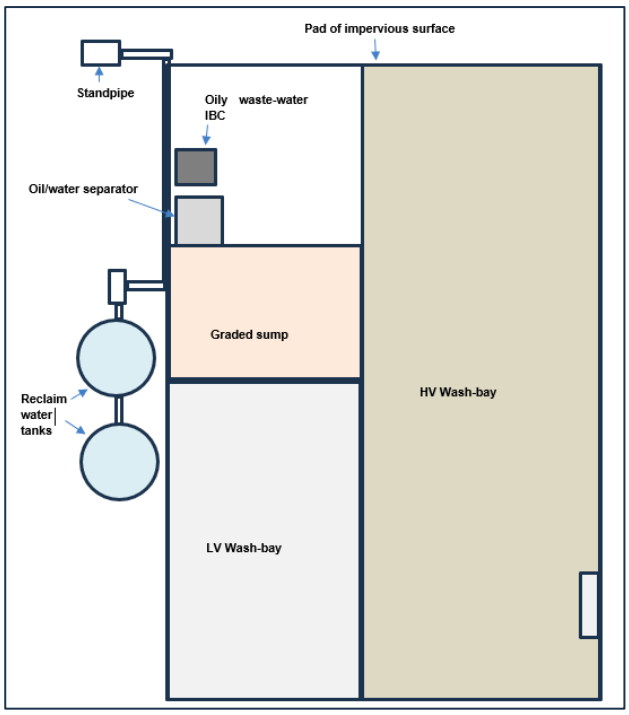



**Figure 8: General arrangement for wash-bay layout**

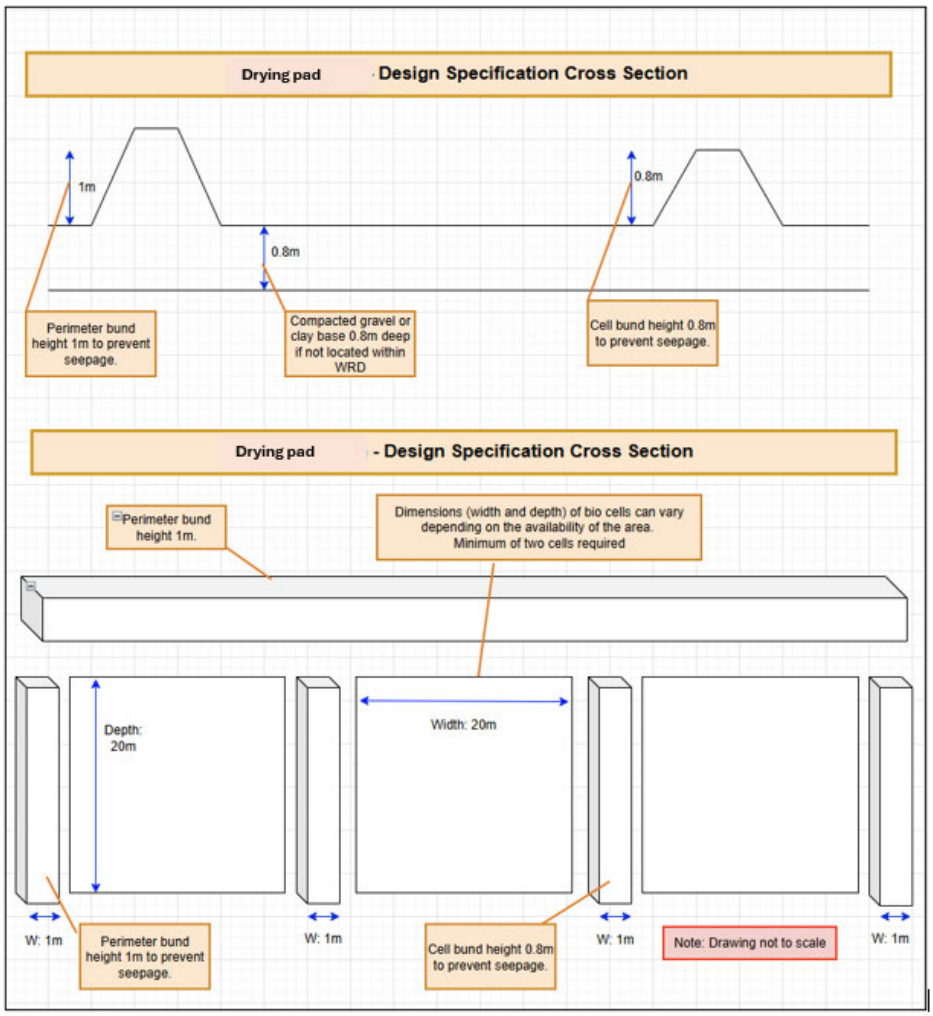



**Figure 9: Drying cell within waste rock landform**

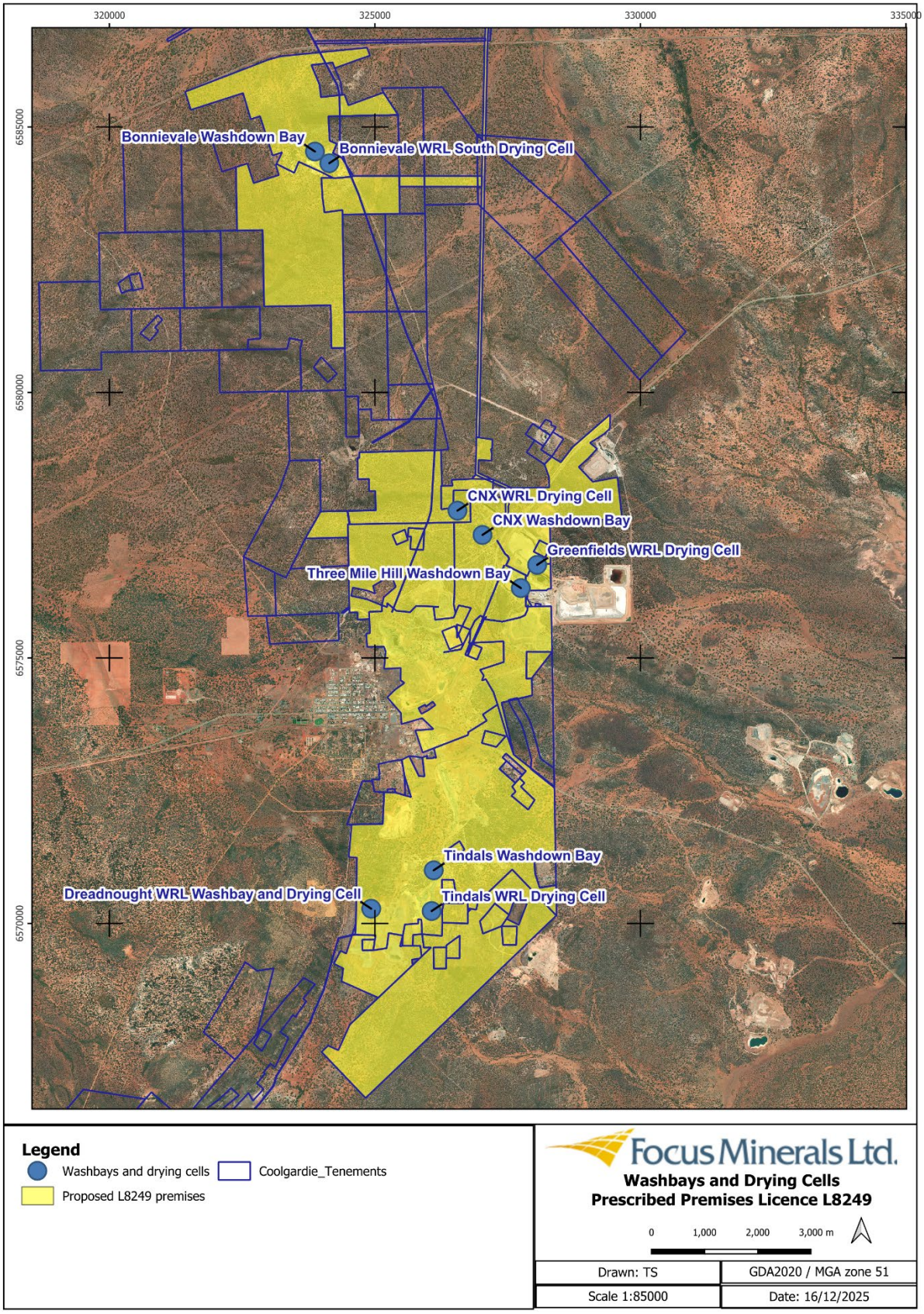



**Figure 10: Location of washdown bays with oily water separators and WRLs containing drying pads**

# 4 OTHER APPROVALS AND CONSULTATION – ATTACHMENT 5

This section details the relevant environmental approvals that have been gained or are being sought in relation to this application and the consultation undertaken in developing this application.

## 4.1 Environmental legislative framework

Table 6 below provides a summary of the relevant environmental legislative framework. This includes any statutory requirements that will affect the environmental management.

**Table 6: Environmental Legislative and Approvals Framework**

| Relevant Legislation | Regulatory Department | Licence/ Permit/ Approval | Environmental Factors | Project requirements for approval |
|---|---|---|---|---|
| ***Environment Protection and Biodiversity Conservation (EPBC) Act 1999*** | The Australian Government Department of the Environment | N/A | Flora/fauna, habitats / heritage, and places. All which are considered of national significance | N/A - Not referred for assessment as no significant impact on a matter of national environmental significance |
| ***Environmental Protection (EP) Act 1986 (IV)*** | Western Australian Environmental Protection Authority (DWER EPA Services) | Part IV | Flora/Fauna/Biodiversity/ Ecosystems and Water sources | N/A - Not referred for assessment as Project does not trigger criteria listed in Memorandum of Understanding (MoU) between the DMPE and the Environmental Protection Authority (EPA) for referral under Part IV. |
| ***Environmental Protection (Clearing of Native Vegetation) Regulations 2004*** | Delegated to Department of Mines, Petroleum and Exploration (DMPE) | Clearing Permit | Ecosystems / flora and fauna/ water resources / Landforms. | Clearing will be managed under approved Clearing permits or Clearing will be managed under the 10ha per tenement annual exemption.<br>Current permits include:<br>• CPS 9513/1<br>• CPS 10442/1<br>• CPS 10572/2<br>• CPS 10870/1<br>• CPS 11317/1 is under assessment<br>Clearing permit locations appear in Figure 11. |

| Relevant Legislation | Regulatory Department | Licence/ Permit/ Approval | Environmental Factors | Project requirements for approval |
|---|---|---|---|---|
| ***Mining Act 1978*** | DMPE | Mining Development and Closure Proposal | Disturbance areas and general environmental management.<br><br>Processing of ore off-site | Existing Mining Proposals (and Mine Closure Plan) addresses these requirements and a Mining Development and Closure Proposal (MDCP) following the format outlined in the 2025 guidelines is forthcoming. |
| ***Rights in Water and Irrigation Act 1914*** | Department of Water and Environmental Regulation (DWER) | Licence to take water - Ground Water Licence (GWL) | Water Resources | Focus holds groundwater licence: GWL160936(9) which allows for the abstraction of 3,215,000 kL/year from the fractured rock aquifer. The licence is for the purpose of dewatering, dust suppression, processing and other mining purposes. |
| ***Aboriginal Heritage Act 1972*** | Department of Planning, Lands and Heritage | Section 18<br>Section 20 | Registered Aboriginal Heritage Sites | No registered sites are present in the application areas. |
| ***Dangerous Goods Safety Act 2004*** | Worksafe – Department of Local Government, Industry Regulation and Safety | | Water resources<br>Landforms | Explosives and hydrocarbons (e.g. waste oil) will be stored at various locations at the premises and handled in accordance with the relevant regulations, and by organisations (e.g. waste contractors) who hold the appropriate licences. |
| ***Work Health and Safety Act 2020*** | DMPE | | Employee and public safety | Major Hazards Management Plan or equivalent will be required. |

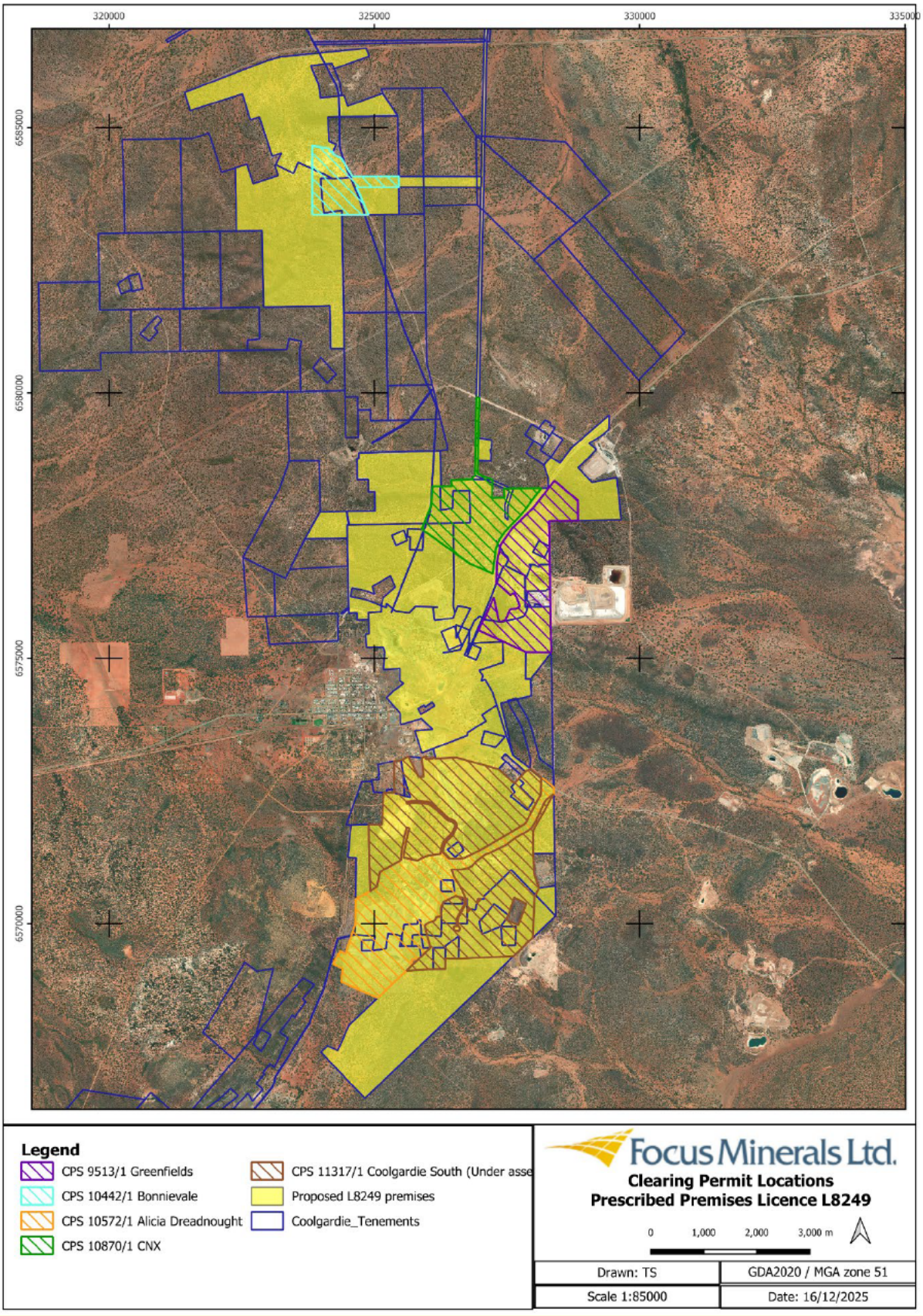



**Figure 11: Clearing Permits relating to the L8249 premises**

## 4.2 Stakeholder consultation

Consultation undertaken in the development of the licence amendment appears below in Table 7.

**Table 7: Stakeholder consultation record**

| Stakeholder Group | Consultation Type | Focus Representative | Date | Consultation Topic | Focus Comments or Actions and notes |
|---|---|---|---|---|---|
| **DWER – Fiona Westcott Dula Wijethilake Steven Middleton** | **Teams Meeting** | **Tony Smith, Gemma Blick** | 29/08/2025 | **Prescribed Premises Licence L8249 Amendment Scoping meeting** | Focus seeking to amend Prescribed Premises Licence L8249 to:<br>- Incorporate toll treatment into Cat 5 licence item - DWER advised risk assessment taking into account geochem of ore/tailings of toll treated material, geotechnical implications of the material, strength of material, percentage solids, and the change (if any) of potential emissions associated with the toll treatment. Focus will not seek this amendment at this stage.<br>- Addition of Cat 6 locations - extra pits to dewater from and to - nominate them and assess whether there is a change in emissions associated with adding these<br>-Cat 12 - being able to place mobile crushing units in multiple locations across the site - DWER advised revised map with nominated areas (not necessary for specific locations) with risk assessment against sensitive receptors to demonstrate any change in impact to receptors.<br>Cat 89 to Cat 64 - seeking advice on whether to add cat 64 in place of Cat 89 as Cat 89 landfills limit may be will be exceeded on the premises so wish to have a Cat 64 classification which has a higher limit. DWER were not clear that we could do this or not. Focus determined that Cat 89 will remain suitable for the purposes of the operation. |
| **DWER - Christine Pustkuchen Steven Middleton**<br><br>**Shire of Coolgardie –**<br><br>**Pergy Matsika Sabine Taylor** | **Teams Meeting** | **Gemma Blick, Tony Smith** | 29/08/2025 | **Approvals Required for taking treated sewage wastewater from Shire of Coolgardie - Potential licence amendment or Works Approval** | What Schedule 1 Category do we need in terms of Prescribed Activities under EP Act. Christine Pustkuchen advised Cat 61 required for discharge of treated sewage to land - i.e. into a tank or containment pond for next use in processing plant.<br>TS - can Focus do this with a Licence Amendment or does it need to be done with a Works Approval? Christine announced preference for Licence Amendment but conceded that Departmental polices might require a Works Approval for construction of the tank/pond. Christine will provide a follow-up email with this advice (Licence Amendment or Works Approval). |
| **Department of Health – Nilu Gunarathne**<br><br>**Shire of Coolgardie – Pergy Matsika Sabine Taylor** | **Teams Meeting** | **Wei Xi Gemma Blick Tony Smith William Price** | 3/9/2025 | **DOH requirements for taking treated wastewater for use at Three Mile Hill Processing plant or for dust suppression** | Focus will need a Recycled Water Quality Management Plan<br>An agreement between Focus and Shire of Coolgardie will need to be supplied<br>If water has no potential for human contact (completely contained within process circuit) then likely a lower-level risk assessment required and after initial monitoring, unlikely to require monitoring. If to be used for dust suppression or there is potential for human contact, initial 6 weeks of monitoring standard parameters will be required and likely ongoing monthly testing of parameters required. |

# 5 EMISSIONS AND DISCHARGES – ATTACHMENT 6A

## 5.1 Potential Environmental Impacts

### 5.1.1 Surface Water

Focus does not anticipate any impacts to surface water from the construction and operation of proposed activities in this report. Surface water and any potential impacts will be managed in accordance with the Focus Environment Management System (EMS).

Bunds that divert stormwater around and contain stormwater within crushing and screening and landfill locations are to be used as controls at the locations appearing in this report.

### 5.1.2 Groundwater

Focus does not anticipate any impacts to ground water from the activities highlighted in this report. Groundwater and any potential impacts will be managed in accordance with the Focus EMS, Prescribed Premises L8249/2008/3 and GWL160936.

Focus has a groundwater monitoring program in place in line with the DWER Prescribed Premises Licence 8249/2008/3. Focus also monitors for a number of additional analytes as part of the ground water monitoring program. Samples are taken on site and sent for analysis to a NATA accredited laboratory. Results are reviewed and recorded in Focus internal database and reported annually to DWER and DEMIRS as required by licence and tenement conditions.

Focus has internal water monitoring procedures detailing the steps to be followed when conducting groundwater and surface water monitoring.

### 5.1.3 Uncontrolled Discharge

Focus does not anticipate any uncontrolled discharge from the construction or operation activities proposed. All hydrocarbons, fuels and chemicals to be used during the construction, commissioning and operation will be adequately stored within bunds and managed in accordance with Focus EMS, dangerous good licences and safety procedures.

All dewatering pipelines will be contained within v drains and inspected regularly for leaks and have automatic pressure and shut off valves.

### 5.1.4 Dust Emissions

Dust is a non-point source emission which cannot be accurately quantified. The emissions of dust may occur as a result of light vehicles, plant equipment and heavy haulage vehicles associated with the works proposed in this application.

The environmental risks associated with the emission of dust to the atmosphere are considered to be low.

Dust will be managed by the following:

- Minimising the area requiring vegetation removal;
- Clearing will not occur during prevailing environmental conditions; and

- Where required, water will be applied to roads and trafficked surfaces to minimise dust generation.

Focus does not anticipate any significant impacts to the surrounding environment from the generation of dust during the works proposed in this application.

### 5.1.5 Noise Emissions

Sources of noise may be associated with earthmoving equipment, light vehicles and diesel generators.

Focus does not anticipate any impacts to sensitive receptors resulting from noise generation.

### 5.1.6 Hydrocarbon Storage and Disposal

Hydrocarbon spills may contaminate the soil, surface water and groundwater and consequently pose a risk to fauna and flora reliant on those resources for survival. Risk associated with large hydrocarbon spills will be minimised by storing diesel fuel and other hydrocarbons in self-bunded fuel storage tanks at the Bonnievale Underground and TMH processing plant and workshop areas.

Lubricants and waste oil will also be contained within portable bunding. All refuelling and vehicle maintenance will occur within a bunded area.

Hydrocarbons will be managed by the following:

- Lubricants and waste oil will be contained within sufficient bunded areas;
- All refuelling and vehicle maintenance will occur within a bunded area at the fuelling bay or workshop; and
- Spill kits will be placed at the refuelling area and in all service vehicles and staff will be trained in the proper use of the kits.

Focus will ensure all hydrocarbons will be managed in accordance with the Focus EMS, procedures and management plans and dangerous good licences.

### 5.1.7 Discharges to Land

Discharges to land include but are not limited to dewatering of pits to containment facilities, discharge of tailings into the TSF, and discharge of water onto roads and around mining infrastructure for dust suppression. Discharge points have been identified in Figure 5.

### 5.1.8 Landfill facilities

All general waste will be removed from site and disposed of at an appropriately licenced landfill either at the Bonnievale landfill, Greenfields landfill, Three Mile Hill WRL South landfill, Tindals Landfill, Dreadnought landfill or the Local Shire landfill. Landfills within the premises appear in Figure 7.

**Table 8: Risk Assessment**

| Phase | ID | Risk ID & Pathway | Impacts | Inherent Likelihood | Inherent Consequence | Inherent Risk | Control | Residual Likelihood | Residual Consequence | Residual Risk | Department |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Construction, Operations** | 1 | **Spill or leak of hydrocarbon / hazardous substances (<50L)** | Localised soil contamination<br>Surface water contamination from runoff<br>Loss of viable topsoil<br>Release of flammable liquids or gases leading to fires | Possible | Insignificant | L | Scheduled maintenance and servicing of vehicles to be undertaken, as per manufacturer's recommendations<br>Spill kits readily available on site<br>Personnel trained in spill response procedure and use of spill kits<br>Contractor EMS/ Contractor Management Plan in place and audited by Focus<br>Refuelling will occur offsite within the Mill Operation Area.<br>Hydrocarbons or hazardous substances will be appropriately stored.<br>MSDS readily available on site.<br>Emergency Response Plan implemented<br>Contaminated material disposed via suitable licenced contractor to an approved facility. | Unlikely | Insignificant | L | **Site Manager**<br>**Mining**<br>**Environment** |
| **Construction, Operations** | 2 | **Excessive dust generation from clearing, earthworks or Cat 12 activities** | Decline in vegetation productivity through smothering<br>Reduction in visibility<br>Fauna/flora interactions leading to deaths or habitat destruction | Unlikely | Minor | L | Dust suppression via water truck, as necessary<br>Progressive clearing to allow dust to settle before undertaking further clearing<br>Avoid clearing on windy days<br>Site visual inspections undertaken<br>Appropriate maintenance of vehicles and machinery | Rare | Minor | L | **Site Manager**<br>**Mining**<br>**Environment** |
| **Construction, Operations** | 3 | **Machinery or vehicle interactions with flora and fauna** | Fauna death or injury<br>Loss of native vegetation or fauna habitat<br>Reduction in biodiversity | Unlikely | Minor | L | Use of Ground Disturbance Permitting systems and Clearing Permits.<br>Training identifies flora and fauna management strategies<br>Supervision during excavation activities - excavation areas to be demarcated.<br>Vehicle and mobile equipment limited to the Development Envelope only.<br>Use of designated tracks and roads.<br>Vehicles required to comply with speed limits.<br>Limit animal access to artificial water points - e.g. fencing potential water sources<br>Good housekeeping to not attract fauna to site.<br>No pets allowed on site | Rare | Minor | L | **Site Manager**<br>**Mining**<br>**Environment** |
| **Construction, Operations** | 4 | **Uncontrolled release of hypersaline water associated with Cat 6 activities** | Native vegetation and habitat loss<br>Impact to amenity<br>Localised soil contamination<br>Sedimentation run-off<br>Erosion | Possible | Minor | M | Dewatering pipelines will be fitted with pressure monitors and automatic shut off valves.<br>Dewatering pipelines will be located in a V drain or bunded area | Unlikely | Minor | L | **Site Manager**<br>**Mining** |
| **Construction, Operations** | 5 | **Excessive noise generated from machinery and mining activities (including Cat 12 activities)** | Impact to amenity<br>Non-compliance with noise regulations<br>Impact to fauna<br>Impact to sensitive receptors (Town of Coolgardie) | Unlikely | Minor | L | Regular monitoring, maintenance and inspections of machinery and vehicles.<br>Compliance with Noise Regulation requirements<br>Vehicle and mobile plant movement limited to the Development Envelope and tracks/roads.<br>Vehicle speed limits. | Unlikely | Minor | L | **Site Manager**<br>**Mining**<br>**Environment** |

| Phase | ID | Risk ID & Pathway | Impacts | Inherent Likelihood | Inherent Consequence | Inherent Risk | Control | Residual Likelihood | Residual Consequence | Residual Risk | Department |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Complaints can be managed through incident reporting procedure | | | | |
| **Construction, Operations** | **6** | **Unauthorised clearing/ disturbance, or disturbance beyond approved extent** | Loss of native flora species and fauna habitat<br>Fauna death or injury<br>Spread or introduction of weed species<br>Government penalties<br>Reputational damage<br>Dust generation<br>Erosion and sediment generation<br>Damage to neighbouring property. | Possible | Minor | **M** | Use of Ground Disturbance Permitting systems and Clearing Permits.<br>Training and inductions identify heritage, flora, fauna, noise, vibration and air quality management.<br>Compliance with Clearing and Ground Disturbance Procedure.<br>Vehicle and mobile equipment limited to the Development Envelope.<br>Demarcation of areas prior to any clearing<br>Supervision and communication with operators conducting clearing activities managed by Focus site management team.<br>Rehabilitation of select areas and progressive rehabilitation of unused cleared areas to begin as soon as practicable<br>Internal audits of disturbance footprint against approved plans<br>Regular record keeping and cross check against GIS<br>Annual reporting in Annual Environmental Report (AER) of disturbed/ approved areas | Unlikely | Minor | L | **Site Manager**<br>**Mining**<br>**Environment** |
| **Construction/Operations** | **7** | **Loss of containment of reagents/ hydrocarbons (>50L)** | Contamination of land/ groundwater/ surface water | Possible | Moderate | H | Bunding constructed to AS 1940-2004<br>Annual Audits and improvements made as recommended<br>Employee/Contractor Training<br>Contractor holds appropriate licences<br>Compliance with EMS (contractor)<br>Spill kits available on site and employees trained in correct usage.<br>Hydrocarbon/ hazardous substance spill training<br>MSDS are available<br>Emergency Response Plan in place<br>Disposal of waste by a suitably licensed contractor to an approved facility | Unlikely | Minor | L | **Site Manager**<br>**Mining**<br>**Environment** |
| **Construction/Operations** | **8** | **Spread or introduction of weed species by unclean machinery or vehicles** | Loss of vegetation due to competition from weed species<br>Loss of native habitat<br>Reduction in biodiversity<br>Reduction in quality viable topsoil and seedbank | Unlikely | Minor | L | Ensure hygiene inspections completed before equipment enters site.<br>Spot audit inspection of vehicles entering site.<br>Training of weed hygiene practices for all employees.<br>Appropriate vehicles and machinery maintenance including regular washing<br>Weed spraying in areas of infestation to be undertaken, where required<br>Weed register kept up to date<br>Weed of National significance are actively managed according to relevant guidelines | Rare | Minor | L | **Site Manager**<br>**Mining**<br>**Environment** |
| **Life of Mine** | **9** | **Ineffective operational implementation of site EMS, plans and procedures** | Environmental incidents<br>Non compliances under licence or conditions | Possible | Moderate | H | Comply with EMS.<br>All events/incidents/near misses to be reported and managed through to resolution via incident/event reporting procedures. | Unlikely | Minor | L | **Site Manager**<br>**Mining** |

| Phase | ID | Risk ID & Pathway | Impacts | Inherent Likelihood | Inherent Consequence | Inherent Risk | Control | Residual Likelihood | Residual Consequence | Residual Risk | Department |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Financial implications<br>Reputational damage<br>Delay of works | | | | Ensure EMS, procedures and policies are up to date with the scope of the CGO.<br>EMS and procedures are regularly reviewed and accessible to all employees.<br>Staff and Contractors are made aware of responsibilities and site requirements through regular training.<br>Contractor EMS and procedures align to Focus requirements and approvals.<br>Annual audit of contractor EMS and performance by Focus.<br>Daily Tool-Box includes standing item for environmental issues.<br>Designated Environmental Advisor on site. | | | | **Environment** |
| **Construction/Operations** | **10** | **Conducting works without appropriate approvals and licences** | Impact to reputation<br>Financial impact<br>Government infringements<br>Tenement forfeiture<br>Reputational damage<br>Impact to sensitive receptors<br>Impact to stakeholders<br>Delay of works | Possible | Moderate | H | Implementation of the EMS.<br>Regular internal review of approval status (up to date and extent of approval)<br>Construction in line with conditions of approvals<br>Approvals developed in line with statutory guidelines<br>Contractor EMS and procedures align to Focus requirements and approvals<br>Annual audit of contractor EMS and performance by Focus<br>Daily Tool-Box includes standing item for environmental issues<br>Designated Environmental Advisor on site | Unlikely | Moderate | L | **Site Manager**<br>**Mining**<br>**Environment** |
| **Construction, Operations, Closure** | **11** | **Inadvertent access to Mine Water Ponds resulting in fauna/human injury or death** | Destruction of rehabilitated areas<br>Fauna injury or death<br>Human injury or death | Unlikely | Major | H | Access restricted to authorised people only<br>Fauna egress matts and or fencing for mine water ponds<br>Adequate signage to inform restricted areas<br>Bund across access roads restricting vehicle entry<br>Blocking off/rehabilitating disused access tracks and exploration tracks around mining operations | Rare | Major | H | **Site Manager**<br>**Mining**<br>**Environment**<br>**Safety** |
| **Construction, operation** | **12** | **Surface water pollution** | Pollution of surface water runoff from leaks or pipeline failure. | Unlikely | Minor | L | Dewatering pipelines will be contained within bunds and or buried<br>Dewatering pipelines will contain leak detection monitors<br>Dewatering pipelines will be inspected daily.<br>The dams onsite will have a minimum freeboard of 500mm and inspected daily.<br>Areas of prescribed activities bunded to divert clean stormwater around activities and to contain stormwater within activity areas and preventing escape. | Rare | Insignificant | L | **Site Manager**<br>**Mining**<br>**Environment** |
| **Construction/Operations** | **13** | **Ground water pollution** | Pollution of local aquifer<br>Negative drawdown on the aquifer | Possible | Moderate | H | Control plant runoff by diverting into lined ponds and v-drains<br>Areas containing chemicals to be bunded and stored away from the dewatering pipeline and water sources.<br>Continue quarterly Groundwater monitoring of SWL and quality in compliance with L8249/2008/3 and GWL160936(8). | Unlikely | Insignificant | L | **Site Manager**<br>**Mining**<br>**Environment** |

# 6 WASTE ACCEPTANCE – ATTACHMENT 6B

All general waste will be disposed of at an appropriately licenced landfill either at the Bonnievale landfill, Greenfields landfill, Three Mile Hill WRL South landfill, Tindals Landfill, Dreadnought landfill or the Local Shire landfill.

Landfill waste as described in Section 3.4 will be accepted at landfills located at the premises.

# 7 SITING AND LOCATION – ATTACHMENT 7

## 7.1 Regional setting, land use and community

The CGO is located within the Shire of Coolgardie. The Shire is sparsely populated, with a large community of fly-in-fly-out workers along with the longer-term residents. Gold and nickel mining, pastoralism and tourism are the principal economic activities in the area.

The Project area is located within the Eastern Goldfields Interim Biogeographic Regionalisation for Australia (IBRA) subregion. This is characterised by the Yilgarn Craton's gently undulating plains which are interrupted to the west with low hills and ridges Archaean greenstones and to the east by a horst of Proterozoic basic granulite (IBRA, 2010).

There are no permanent rivers, creeks or lakes within the Project area.

Mining is an established economic activity in the Coolgardie region and has occurred historically in the general area since the discovery of gold in 1800's. Numerous historic mine landforms are located across the CGO area including abandoned open cut mines, waste rock dumps, historical shafts, underground workings and associated mining infrastructure, some of which have heritage values and attract tourists from WA and inter-state.

Sensitive receptors are displayed on Figure 12.

## 7.2 Cultural Heritage and Native Title

There is no Native Title Determination across the Prescribed Premises. The Prescribed Premises area is located within boundaries of one registered Native Title claim, the Marlinyu Ghoorlie Claim, Number WC2017/007.

No registered heritage sites will be impacted by the proposed activities.

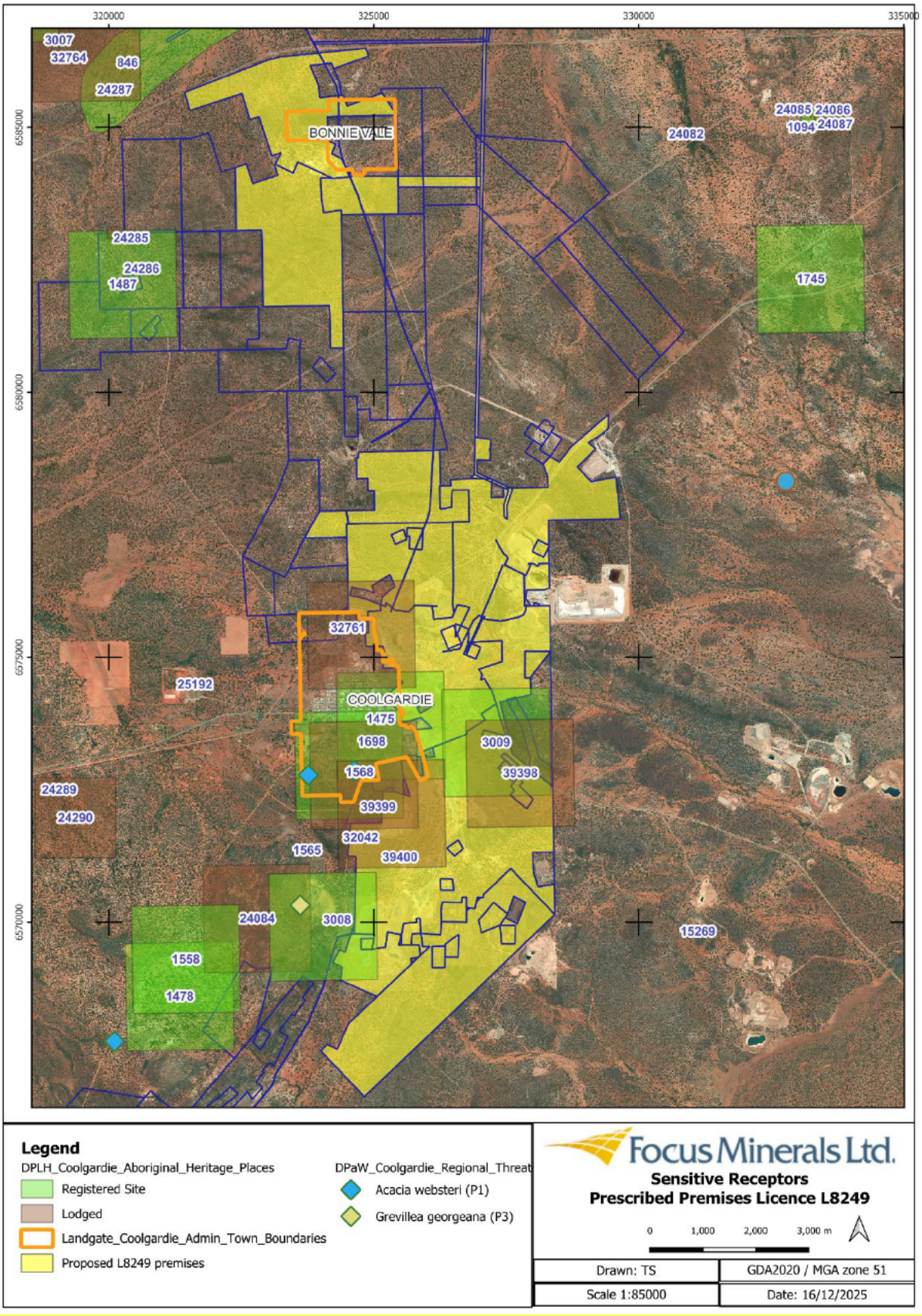
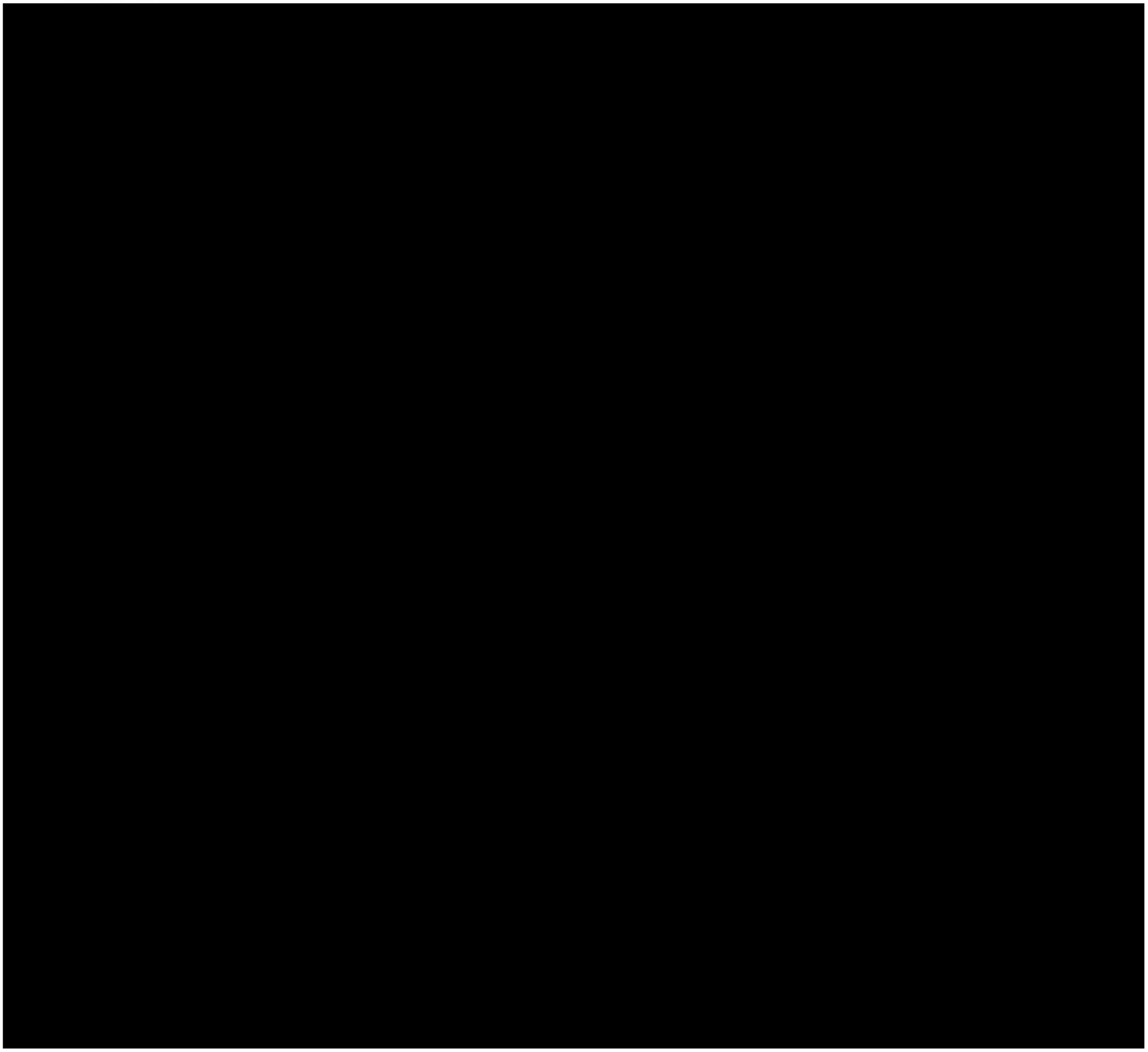



**Figure 12: Sensitive Receptors**



# 10 APPENDICES

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