



## Application for Licence Amendment

### Part V Division 3 of the *Environmental Protection Act 1986*

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<b>Licence Number</b>	L8232/2008/2
<b>Licence Holder</b>	Pilbara Iron Company (Services) Pty Ltd
<b>ACN</b>	107 210 248
<b>File Number</b>	DER2013/001103 & APP-0031697
<b>Premises</b>	<p>Brockman Syncline 4 Mine</p> <p>Legal description –</p> <p>Part of State Agreement Mining Lease ML4SA, General Purpose Lease G47/1232, and part of Miscellaneous Licences L47/153 and L47/141</p> <p>ROCKLEA WA 6751</p> <p>As defined by the Premises map attached to the Revised Licence</p>
<b>Date of Report</b>	5 June 2026
<b>Decision</b>	Revised licence granted

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# 1. Decision summary

Licence L8232/2008/2 is held by Pilbara Iron Company (Services) Pty Ltd (Licence Holder) for the Brockman Syncline 4 Mine (the Premises), located at ML 4SA, G 47/1232, L 47/153 and L 47/141, Rocklea.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the construction and operation of the Premises. As a result of this assessment, Revised Licence L8232/2008/2 has been granted.

The Revised Licence issued as a result of this amendment consolidates and supersedes the existing Licence previously granted in relation to the Premises.

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department 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

On 16 October 2025, the Licence Holder submitted an application to the department to amend Licence L8232/2008/2 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Construction of a 30 km high-density polyethylene (HDPE) pipeline to connect and transfer surplus mine dewater from the Brockman Syncline 4 (BS4) Hub to the Brockman Syncline 2 (BS2) Hub (L5258/1991/11);
- Amend the prescribed premises boundary to incorporate the additional pipeline;
- Removal of the environmental commissioning phase of the Brockman Syncline 4 Mine WWTP; and
- Administrative changes to landfill condition terminology and environmental reporting terminology.

This amendment is limited only to changes to Category 6, 54 and 64 activities from the Existing Licence. No changes to the aspects of the existing Licence relating to Category 5, 12 and 73 have been requested by the Licence Holder. Table 1 below outlines the proposed changes to the existing Licence.

**Table 1: Proposed design or throughput capacity changes**

Prescribed premises category and description	Proposed or existing production or design capacity	Proposed changes to the existing production or design capacity <sup>1</sup> (amendments only)	Proposed activities, processes, or operations, including any changes to existing operations (if amendment)
Category 6: Mine dewatering	<u>Existing</u> 6,400,000 tpa	No change	Construction of a new pipeline from BS4 to BS2.
Category 54: Sewage facility	<u>Existing</u> 983 cubic metres per day	No change	The Licence Holder is proposing to: <ul style="list-style-type: none"><li>• Remove the commissioning-</li></ul>

			<p>phase Total Nitrogen (TN) and Total Phosphorus (TP) concentration targets from the Licence;</p> <ul style="list-style-type: none"> <li>• Continue quarterly monitoring of TN, TP, BOD, TSS, pH, E.coli and residual chlorine; and</li> <li>• Present monitoring results in the Biennial Environmental Report (BER), with results compared against WQPN 22 and NWQMS guidelines.</li> </ul>
Category 64: Class II putrescible landfill site	<p><u>Existing</u> 3,375 tonnes per annual period</p>	No change	<p>The Licence Holder has requested an administrative amendment to condition 24 of the Licence to add the wording 'and other locations meeting the criteria in Condition 24' to clarify that approved waste types may be disposed of anywhere within the prescribed premises boundary, provided the environmental siting criteria in condition 24 are met.</p>

### 2.2.1 Category 6 activities – new pipeline and amended premises boundary

The Brockman Syncline Proposal supports Rio Tinto's strategy to extend mining across Greater Brockman through the development of new above and below water table deposits across the Greater Brockman region to support the life of existing operations, including expansions of the BS4 and BS2 Hubs and the development of BS1 as a satellite deposit to BS4.

Mining below the water table requires ongoing dewatering, with water reused within the BS4 Hub for dust suppression and ore processing; however, the volume of dewatering water is expected to exceed BS4's operational requirements. A water deficit has been forecast at the BS2 Hub following a dewatering pause at Silvergrass and the deferral of below water table mining at Lens EF to mitigate potential impacts to groundwater-dependent ecosystems and culturally significant sites.

To address this deficit, the Licence Holder proposes the transferring of surplus dewatering water from BS4 to BS2, primarily to support the Nammuldi operations. Surplus water will be conveyed via a proposed 30 km HDPE pipeline (with selected carbon steel sections), designed in accordance with AS 4041-2006 and AS/NZS 4130-2018, for use in ore processing, dust suppression and other operational water needs. The amended prescribed premises boundary, incorporating the BS4 to BS2 transfer pipeline, is shown in Figure 1.

The BS4 to BS2 transfer pipeline transports dewatering water off-site and outside of the prescribed premises boundary for licence L8232/2008/2. The pipeline will exit the premises boundary and will continue onto the premises boundary for licence L5258/1991/10 which is also held by the Licence Holder. Water will be discharged into Nammuldi pit located at BSB2 Hub.

The Licence Holder submitted a separate application to amend licence L5258/1991/10 on 19 March 2026 seeking approval for two new discharge points into the Nammuldi pit (Pit Lens A and B) (in-pit storage of dewatering water) associated with the BS4–BS2 water transfer pipeline at the BS2 Hub. This application is still pending at the time of granting this amendment to L8232/2008/2.

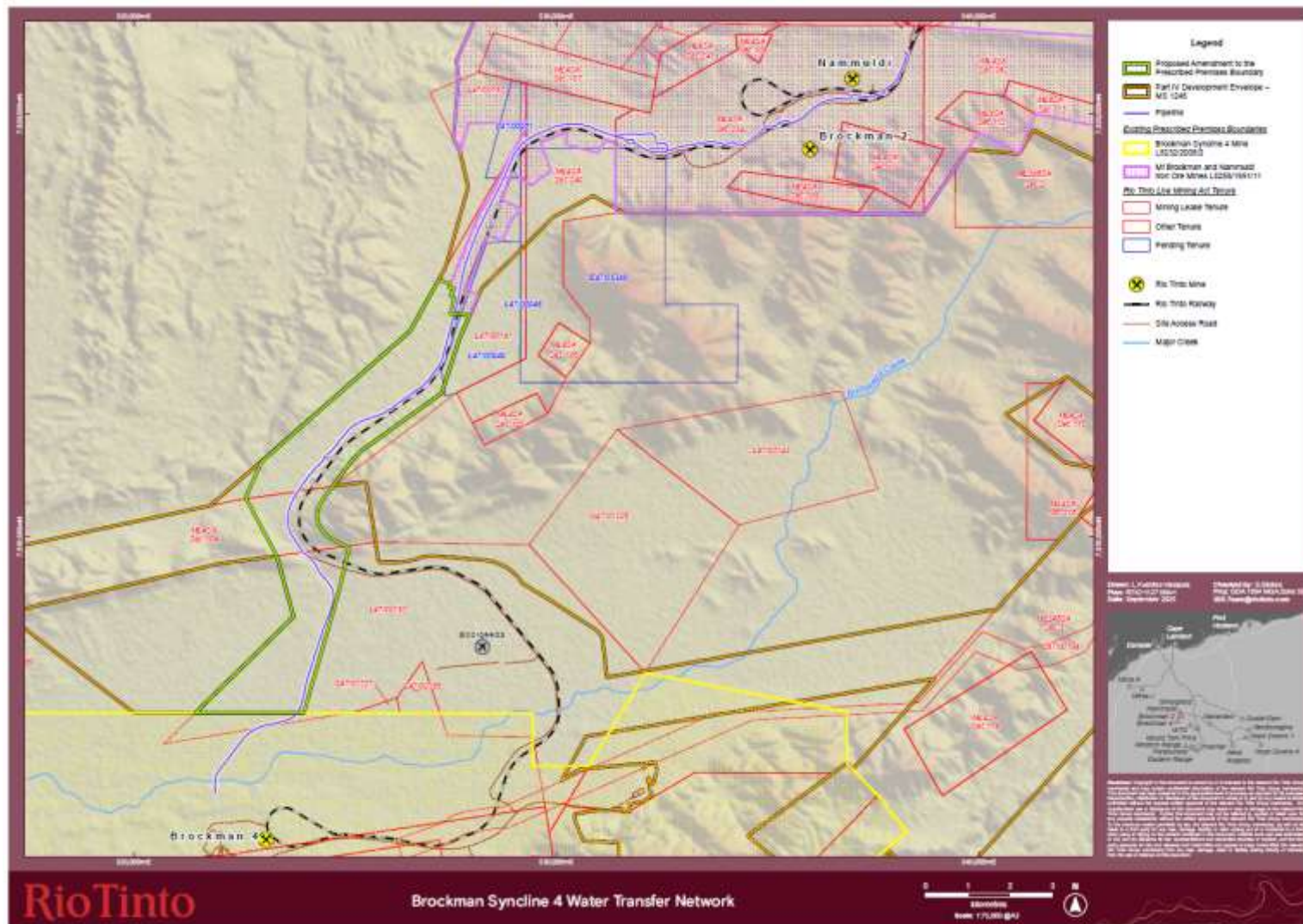


Figure 1: Amended Prescribed Premises boundary and BS4 – BS2 Pipeline corridor

### 2.2.2 Category 54 activities – removal of commissioning phase

The Licence Holder advises that environmental commissioning of the Brockman 4 Mine 60 m<sup>3</sup>/day wastewater treatment plant (WWTP) has been completed. The WWTP, authorised under a licence amendment issued on 16 December 2021, disposes of treated effluent via a 2-hectare irrigation area consistent with the approved premises layout. Commissioning commenced in February 2022, and the Licence Holder submitted an Environmental Commissioning Report to the Department on 12 September 2022 in accordance with Condition 8 of Licence L8232/2008. Following review, the Department required extended monitoring due to intermittent exceedances of the original design effluent quality targets.

The Licence Holder is proposing to close out the commissioning phase by removing the commissioning-phase total nitrogen (TN) and total phosphorus (TP) targets from the Licence, on the basis that assessment of effluent monitoring data for 2024 and 2025 indicates that estimated annual average nutrient loading rates fall within the Category D screening thresholds under *Water Quality Protection Note 22 – Irrigation with nutrient-rich wastewater*.

The Licence Holder proposes to continue quarterly monitoring of TN, TP, BOD, TSS, pH, *E. coli* and residual chlorine, with results reported through the Biennial Environmental Report and assessed against WQPN 22 and the *National Water Quality Management Strategy (1997)* guidelines (NWQMS). No changes are proposed to the approved Category 54 infrastructure or design capacity, and the Licence Holder has requested that the WWTP be transitioned to routine operation under Licence L8232/2008.

Assessment of the 2024 and 2025 monitoring data indicates variability and intermittent exceedances in effluent TN and TP concentrations; however, when considered in conjunction with reported irrigation volumes and the approved 2-hectare irrigation area, the estimated annual average nutrient loading rates are approximately 271–318 kg/ha/year for TN and 7–12 kg/ha/year for TP, which remain within the Category D screening thresholds. Consistent with the principles of the NWQMS, nutrient performance for land application is assessed on the basis of mass loading and the potential for sustainable land use rather than strict concentration-based limits. While average annual loading rates alone do not demonstrate acceptable performance, the Department considers that potential nutrient-related risks can be effectively managed through additional regulatory controls in the Licence, including requirements to prevent ponding and runoff beyond the irrigation area, daily routine inspection of the irrigation field, and confirmation that treated effluent remains contained within the approved disposal area without adverse impacts to vegetation or surrounding land. Subject to the inclusion of these controls and continued monitoring, transition of the WWTP to routine operation under Licence L8232/2008 is supported.

The effluent monitoring data for 2024 and 2025 show intermittent exceedances in total nitrogen and total phosphorus concentrations when considered against typical secondary treatment performance. However, the National Water Quality Management Strategy does not set prescriptive concentration limits for nutrients for land application. Instead, it requires assessment of nutrient mass loading and the potential for sustainable use of land without unacceptable accumulation or off-site impact.

### 2.2.3 Category 64 activities – amendment to landfill conditions

The Licence Holder has requested an amendment to Condition 22 to authorise the construction and operation of additional landfill sites within the prescribed premises boundary. This amendment clarifies that approved waste types may be disposed of anywhere within the boundary, provided the siting criteria in Condition 24 are met. The Licence Holder has provided the design and management conditions/criteria are outlined below:

- minimum 100 m separation from permanent or perennial watercourses;
- minimum 2 m vertical separation from the highest seasonal groundwater level;
- placement outside heritage exclusions and operationally constrained areas;
- maintenance of stormwater controls (windrows, bunds, sumps) to prevent contact water; and
- progressive covering of waste to prevent windblown material and fauna attraction.

Section 3.2 provides the risk assessment of potential emissions and discharges from the premises during the construction and operation of category 64 landfill sites under the Figure 1, Schedule 1 maps within the Licence L8232/2008/2.

### 2.2.4 Administrative amendment – reporting requirements

The reporting requirements of Licence L8232/2008/2 currently require the submission of an Annual Environmental Report (AER). However, on 16 May 2022, the Department issued a Notice of Amendment of Licence Reporting Requirements, revising this requirement to a Biennial Environmental Report (BER).

To ensure consistency between the Licence conditions and current reporting obligations, the Licence Holder has requested a minor administrative amendment to Condition 31, and any other relevant sections, to reflect the requirement for a BER, due by 30 April every second year.

## 2.3 Part IV of the EP Act

Ministerial Statement 1246, approved on 3 February 2025, relates to the Brockman Syncline Proposal. The proposal is a significant amendment that includes the existing Nammuldi-Silvergrass, Brockman 2 and Brockman 4 operations, together with the expansion to develop new above and below water table deposits and associated activities previously approved under MS 131, 867, 925 and 1000.

This amendment relates only to Category 6 activities for the BS4–BS2 dewater transfer pipeline and does not duplicate the Part IV assessment; it provides the specific licence conditions needed to put the MS 1246 requirements into practical operation.

## 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 Amendment Report are detailed in below.

also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

**Table 2: Licence Holder controls**

Emission	Sources	Potential	Proposed controls
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		pathways	
<b>Construction</b>			
Dust	Construction of 30 km surplus mine dewater pipeline from BS4 to BS2  Construction of landfill sites  Movement of construction vehicles on unsealed roads	Air/windborne pathway	<ul style="list-style-type: none"> <li>No controls proposed by Licence Holder.</li> </ul>
	Construction of landfill sites		<ul style="list-style-type: none"> <li>No controls proposed by Licence Holder</li> </ul>
<b>Operation</b>			
<b>Category 6: Mine dewatering</b>			
Mine dewater	Transport of mine dewater from BS4 to BS2	Direct discharge to land and Seepage through the soil profile to groundwater from pipeline leaks or ruptures	<u>Applicant controls</u> <ul style="list-style-type: none"> <li>Undertake weekly visual inspections of the dewatering pipelines to check for damage, ruptures and/or leaks.</li> <li>Pipeline will be equipped with flow meters and pressure transmitters at strategic locations to allow for continuous flow/pressure monitoring via telemetry/SCADA with alarms to detect potential pipeline leaks/failures;</li> <li>Isolation valves will be installed at regular intervals to allow a response to leak/failures through controlled booster shutdown and sectional isolation; and</li> <li>Automatic (or operator-verified) controlled shutdown of booster pumps in response to significant flow anomalies;</li> </ul> <u>Existing controls in Licence L8232/2008/2:</u> <ul style="list-style-type: none"> <li>Existing Condition 9 (Table 2) (previously Condition 27): Total Recoverable Hydrocarbons limit</li> </ul>
<b>Category 64: Class II putrescible landfill site</b>			
Leachate	Disposal of wastes to Class II putrescible and inert landfill sites	Soil/groundwater infiltration	<u>Existing controls in Licence L8232/2008/2:</u> <ul style="list-style-type: none"> <li>Existing Condition 9 (Table 2) (previously condition 20, 21 and 22): <ul style="list-style-type: none"> <li>Putrescible landfill stormwater</li> </ul> </li> </ul>

			<p>management;</p> <ul style="list-style-type: none"> <li>- Putrescible landfill distances from surface water and groundwater; and</li> <li>- Waste dump landfill waste acceptance.</li> </ul>
Contaminated stormwater runoff		Overland runoff during rainfall events	<p><u>Existing controls in Licence L8232/2008/2:</u></p> <ul style="list-style-type: none"> <li>• Existing Condition 9 (Table 2) (previously conditions 20, 21 and 25): <ul style="list-style-type: none"> <li>- Putrescible landfill stormwater management; and</li> <li>- Putrescible/waste dump landfill distances from surface water and groundwater.</li> </ul> </li> </ul>
Windblown waste		Airborne disposal	<p><u>Existing controls in Licence L8232/2008/2:</u></p> <ul style="list-style-type: none"> <li>• Existing Condition 9 (Table 2) (previously conditions 18 and 19): <ul style="list-style-type: none"> <li>- Putrescible landfill tipping area dimensions and tipping area cover</li> </ul> </li> </ul>
<b>Category 54: WWTP and irrigation area</b>			
Treated effluent containing total nitrogen and total phosphorus.	Operation of the Brockman 4 WWTP and irrigation of treated effluent to the approved irrigation area.	Runoff, ponding or seepage beyond the approved irrigation area.	<p><u>Existing controls in Licence L8232/2008/2:</u></p> <ul style="list-style-type: none"> <li>• Existing Condition 10 (Table 3) (previously condition 26): Authorised discharge points;</li> <li>• Condition 12 (Table 4) (previously condition 29): WWTP monitoring; and</li> <li>• Condition 14 (Table 5) (previously condition 31): Environmental Reporting requirements</li> </ul>
Untreated sewage	Overtopping of tanks, loss of containment leading to direct discharge to land	Overland runoff	<ul style="list-style-type: none"> <li>• Alarm system installed on tanks. Sounding of the alarm and lighting up of the red warning light indicates malfunctioning of the air system or indicates a high-water level in the pump out chamber</li> <li>• Two full days emergency storage built into the capacity of the facility storage tanks</li> <li>• Spill response equipment installed nearby</li> </ul>

### 3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment.

Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 3 below provides a summary of potential environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (Guideline: *Environmental siting* (DWER 2020)).

**Table 3: Sensitive environmental receptors and distance from prescribed activity**

Environmental receptors	Distance from prescribed activity
Native vegetation (including 1.75 ha of riparian vegetation and aquatic fauna habitat associated to the Boolgeeda Creek riparian zone)	Native vegetation is located directly adjacent to the new mine dewater pipeline.
Conservation significant flora	<p>The flora and vegetation surveys undertaken in the extended premises boundary area confirmed that two priority (P) flora species, namely <i>Indigofera rivularis</i> (P3) (two records) and <i>Eremophila magnifica</i> subsp. <i>Velutina</i> (P3) (several records) occur within area, with <i>Indigofera rivularis</i> recorded within the corridor of the new mine dewater pipeline.</p> <p>Sixteen conservation significant flora species were recorded adjacent to the extended premises boundary including:</p> <ul style="list-style-type: none"> <li>• <i>Hibiscus</i> sp. <i>Mt Brockman</i> (P1);</li> <li>• <i>Hibiscus</i> aff. sp. <i>Gurinbiddy Range</i> (P2);</li> <li>• <i>Eremophila naaykensis</i> (P3);</li> <li>• <i>Grevillea Saxicola</i> (P3);</li> <li>• <i>Gymnanthera cunninghamii</i> (P3);</li> <li>• <i>Indigofera rivularis</i> (P3);</li> <li>• <i>Ipomoea racemigera</i> (P3);</li> <li>• <i>Oxalis</i> sp. <i>Pilbara</i> (P3);</li> <li>• <i>Pentalepis trichodesmoides</i> subsp. <i>Hispidula</i> (P3);</li> <li>• <i>Ptilotus subspinescens</i> (P3);</li> <li>• <i>Sida</i> sp. <i>Hamersley Range</i> (P3);</li> <li>• <i>Swainsona thompsoniana</i> (P3);</li> <li>• <i>Triodia basitricha</i> (P3);</li> <li>• <i>Acacia bromilowiana</i> (P4);</li> <li>• <i>Eremophila magnifica</i> subsp. <i>Magnifica</i> (P4);</li> <li>and</li> <li>• <i>Sida</i> sp. <i>Barlee Range</i> (P4).</li> </ul>
Conservation significant fauna	<p>The fauna surveys conducted in the extended premises boundary area confirmed that two records of the Western Pebble-mound Mouse (<i>Pseudomys chapmani</i>) listed by the Department of Biodiversity, Conservation and Attractions (DBCA) as P4 occur within the area, with the closest record being approximately 250m west of the corridor of the new mine dewater pipeline.</p> <p>Four conservation significant fauna species were recorded adjacent to the extended premises boundary including:</p> <ul style="list-style-type: none"> <li>• Northern Quoll (<i>Dasyurus hallucatus</i>) listed endangered under the <i>Environmental Protection</i></li> </ul>

	<p>and Biodiversity Conservation Act 1999 (EPBC Act) the Biodiversity Conservation Act 2016 (BC Act);</p> <ul style="list-style-type: none"> <li>• Ghost bat (<i>Macroderma gigas</i>) listed as vulnerable under the EPBC Act and BC Act;</li> <li>• Pilbara leaf-nosed bat (<i>Rhinoicteris aurantia</i>) listed as endangered under the EPBC Act and BC Act; and</li> <li>• Peregrine falcon (<i>Falco peregrinus</i>) listed other specifically protected (DBCA).</li> </ul>
Surface water	<p>The new mine dewater pipeline intersects the Boolgeeda Creekline which is an ephemeral creek within the Boolgeeda Creek catchment and is a major tributary of Duck Creek.</p> <p>Several tributaries of the Boolgeeda Creekline occur within the extended premises boundary and intersect the pipeline at multiple points.</p>
Groundwater	<p>Groundwater levels across the Brockman Syncline project area are generally deep and beyond the typical depth of vegetation root systems (&gt;20 m metres below ground level (mbgl)).</p> <p>Groundwater quality in the Brockman Syncline project area is typically classified as fresh, with electrical conductivities varying between 500 and 1,500 <math>\mu\text{S}/\text{cm}</math> and pH values ranging from between 7.2 and 8.4.</p>
Aboriginal Heritage sites	<p>Nine Aboriginal heritage sites occur within the extended premises boundary area.</p> <p>The new mine dewater pipeline intersects two Aboriginal Heritage sites known as 'Pulykita' (Registration ID: 40518) that appears to be associated with the Boogeeda Creekline and 'PKKP B4 06-21' (Registration ID: 24836).</p>

## 3.2 Risk ratings

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

Where the Licence Holder 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 Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

The Revised Licence L8232/2008/2 that accompanies this Amendment Report authorises emissions associated with the construction and operation of the Premises i.e. Category 6, 54 and 64 activities.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

**Table 4. Risk assessment of potential emissions and discharges from the Premises during construction and operation**

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
<b>Construction</b>								
<p>Construction of 30 km surplus mine dewater pipeline from BS4 to BS2</p> <p>Construction of landfill sites</p> <p>Movement of construction vehicles on unsealed roads</p>	Dust	<p><b>Pathway:</b> Air / windborne pathway</p> <p><b>Impacts:</b> Dust deposition impacts to remnant vegetation, conservation-significant flora/fauna and Aboriginal heritage sites</p>	<p>Native vegetation (including riparian vegetation and aquatic fauna habitat)</p> <p>Conservation significant fauna</p> <p>Conservation significant flora</p> <p>Aboriginal Heritage Sites</p>	No controls proposed.	<p>C = Minor</p> <p>L = Unlikely</p> <p><b>Medium Risk</b></p>	N	<p><b><u>Condition 5 (Table 1): Design and construction/installation requirements</u></b></p> <p><b><u>Condition 8: Post-construction compliance report requirement for new landfill infrastructure</u></b></p>	<p><u>DWER controls</u></p> <p>The delegated officer has added the requirement for a watercart to be onsite at all times at the premises to manage dust emissions during construction of the new pipeline and proposed/subsequent landfill facilities to minimise impacts to surrounding environmental receptors.</p> <p>The delegated officer has added a reporting condition for a compliance report to be submitted following the construction of new landfill infrastructure.</p>
<b>Operation</b>								
<b>Category 6: Mine dewatering</b>								
Transport of mine dewater from BS4 to BS2	Mine dewater	<p><b>Pathway:</b> Direct discharge to land via pipeline leaks or spills</p> <p><b>Impacts:</b></p>	Native vegetation (including riparian vegetation and aquatic	Refer to Section 3.1	<p>C = Minor</p> <p>L = Unlikely</p> <p><b>Medium Risk</b></p>	Y	<p>Condition 5 (Table 1): Design and construction/installation requirements</p> <p>Condition 9 (Table 2):</p>	The delegated officer considers the existing controls under the licence and the applicant's proposed controls as outlined in Section 3.1 to

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
		Direct discharge to land causing contamination of soil, impact to health of vegetation and degradation of nearby surface water quality	fauna habitat) Boolgeeda Creekline Conservation significant flora				Operational requirements for Mine dewatering pipelines	be adequate for managing this risk event.
<b>Category 64: Class II putrescible landfill site</b>								
Disposal of wastes to Class II putrescible and inert landfill sites	Leachate	<b>Pathway:-</b> Soil/groundwater infiltration <b>Impact:</b> Contamination of soils, groundwater environmental values	Groundwater	Refer to Section 3.1	C = Minor L = Rare <b>Low Risk</b>	Y	Condition 5 (Table 1): Design and construction/installation requirements Condition 9 (Table 2): Putrescible landfill separation distances	The delegated officer considers the existing controls under the licence and the applicant's proposed controls as outlined in Section 3.1 to be adequate for managing this risk event.
	Contaminated stormwater runoff	<b>Pathway:</b> Overland runoff during rainfall events <b>Impact:</b> Soil, groundwater and surface water contamination. Impacts to native vegetation.	Native vegetation (including riparian vegetation) Surface water (Boolgeeda Creek tributaries) Groundwater		C = Minor L = Possible <b>Medium Risk</b>	Y	Condition 9 (Table 2): Operational requirements for Stormwater management and separation distances	The delegated officer considers the existing controls under the licence and the applicant's proposed controls as outlined in Section 3.1 to be adequate for managing this risk event.
	Windblown	<b>Pathway:</b> Airborne	Native		Refer to Section	C = Minor	N	<b><u>Condition 9 (Table 2): Operational</u></b>

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
	waste	dispersal <b>Impact:</b> Impacts to vegetation and native fauna via ingestion	vegetation Conservation significant fauna Aboriginal Heritage sites	3.1	L = Possible <b>Medium Risk</b>		<u>requirements for containment and collection of washed or windblown waste</u>	To minimise potential impacts to environmental receptors, the delegated officer has included a requirement that any washed or windblown waste observed outside the tipping area be collected and returned on a monthly basis. The condition also requires that washed or windblown waste does not leave the fenced putrescible waste facilities.
<b>Category 54: WWTP and irrigation area</b>								
Operation of the Brockman Syncline 4 Mine WWTP and irrigation of treated effluent to the 2ha irrigation area	Treated effluent containing elevated concentrations of total nitrogen (TN) and total phosphorus (TP).	<b>Pathway:</b> Runoff, ponding or seepage beyond the approved irrigation area due to over-irrigation, uneven distribution or inadequate infiltration. <b>Impacts:</b> Nutrient accumulation in soils, vegetation stress or off-site nutrient enrichment.	Soils Native vegetation (including riparian vegetation) Surface water (Boolgeeda Creek tributaries) Groundwater	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	N	<u>Condition 9 (Table 2): Operational requirements for Daily inspection of the irrigation area to confirm containment, even application and vegetation condition.</u> Condition 10 (Table 3): Authorised discharge points Condition 13 (Table 4): WWTP monitoring Condition 15 (Table 5): Environmental Reporting requirements	<u>DWER controls</u> Although assessment of 2024 and 2025 monitoring data indicates that annual average nutrient loading rates are within Category D screening thresholds, intermittent variability in effluent TN and TP concentrations presents a potential risk if irrigation is not effectively managed. The additional regulatory controls have been included to ensure proactive, site-based verification that wastewater

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
								is evenly distributed, runoff and ponding do not occur, and early signs of vegetation stress are identified. These controls are considered appropriate to manage nutrient-related risks during routine operation and to prevent off-site impacts.
	Spills and leaks of untreated sewage from WWTP	<b>Pathway:</b> Overtopping of tanks, loss of containment leading to direct discharge to land <b>Impacts:</b> Contamination of soils / vegetation and surface water	Soils Native vegetation (including riparian vegetation) Surface water (Boolgeeda Creek tributaries)	Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	Condition 9 (Table 2): Operational requirements for Daily inspection of the irrigation area to confirm containment, even application and vegetation condition.	As construction and commissioning conditions have been removed from the licence these have been replaced with standard operating conditions for the WWTP to ensure any leaks / spills of untreated sewage are prevented. These standard controls have also been applied to the existing Brockman Syncline 4 WWTP (village) and Nammuldi WWTP (village).

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

Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

## 4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

**Table 5: Consultation**

Consultation method	Comments received	Department response
<i>Licence Holder was provided with draft amendment on (Date)</i>		

## 5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

### 5.1 Summary of amendments

Table 6 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

**Table 6: Summary of licence amendments**

Condition no.	Proposed amendments
DWER file number	Administrative updates
Premises details	Inclusion of additional mining tenements, namely Miscellaneous Licences L47/153 and L47/141.
Licence History table	Inclusion of current amendment details.
Condition 1	<b>Previous condition 13</b>
Condition 2	<b>Previous condition 14</b>
Condition 3	<b>Previous condition 15</b>
Condition 4	<b>Previous condition 16</b>
Condition 5 (Table 1)	<b>Previous condition 1.</b> Inclusion of dewatering pipeline from BS4 to BS2 and proposed / subsequent landfill facilities.  Removal of Brockman Syncline 4 Mine WWTP & irrigation area as infrastructure was constructed and deemed to be compliant by the department on 11 April 2022.
Condition 6	<b>Previous condition 2</b>
Condition 7	<b>Previous condition 3</b>
New Condition 8	Introduction of a post-construction compliance report requirement for new landfill infrastructure and clarification that landfill operation is authorised only following demonstrated compliance, after which operational requirements under Condition 9 apply.
New Condition 9	<b>Previous conditions 17, 18, 19, 20, 21, 22, 23, 24, 25, and 26.</b> Operational requirements

(Table 2)	table added to licence to include mobile crushing and screening plant, mine dewatering pipelines, the three WWTP's, irrigation area and landfill sites.
Condition 10	<b>Previous condition 26.</b> Inclusion of the three wastewater treatment plants as authorised infrastructure, permitting discharge of treated effluent to the irrigation area.
Condition 11	<b>Previous condition 27</b>
Condition 12	<b>Previous condition 28</b>
Condition 13 (Table 4)	<b>Previous condition 29</b>
Condition 14	<b>Previous condition 30</b>
Condition 15 (Table 5)	<b>Previous condition 31.</b> Amendment to Condition 31 to update reporting requirements, replacing the Annual Environmental Report with a Biennial Environmental Report (BER) due by 30 April every second year.  Administrative amendments to condition numbering in Table 5.
Condition 16	<b>Previous condition 32</b>
Condition 17	<b>Previous condition 33</b>
Condition 18	<b>Previous condition 34</b>
Condition 19	<b>Previous condition 35</b>
<b>Conditions removed</b>	<b>Previous conditions 4, 5, 6, 7, 8 and 9.</b>  Conditions removed as redundant (environmental commissioning for the Brockman Syncline 4 WWTP has been completed). Operational requirements for the three WWTP's have been added to condition 9 (Table 2).
Figures 1 to 3 Schedule 1: Maps	Figures 1, 2 and 3 have been updated in Schedule 1.
Schedule 2: Premises boundary (Table 7)	Inclusion of the GPS coordinates of the amended premises boundary as Schedule 2.

## References

1. Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) & Australian and New Zealand Environment and Conservation Council (ANZECC) 1997, *Australian Guidelines for Sewerage Systems – Effluent Management*, National Water Quality Management Strategy, Commonwealth of Australia, Canberra.
2. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
4. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
5. DWER 2025, *Water Quality Protection Note No. 22: Irrigation with nutrient-rich wastewater*, Government of Western Australia, Perth.
6. Minister for Environment 2025, *Ministerial Statement No. 1246: Brockman Syncline Proposal*, Government of Western Australia, Perth.
7. Pilbara Iron Company (Services) Pty Ltd 2025, *Response to Request for Information for licence amendment application – Licence L8232/2008/2, Brockman Syncline 4 Mine*, submitted to the Department of Water and Environmental Regulation, December 2025.
8. Pilbara Iron Company (Services) Pty Ltd 2026, *Application for licence amendment under the Environmental Protection Act 1986 – Licence L8232/2008, Brockman Syncline 4 Mine*, submitted to the Department of Water and Environmental Regulation, 29 January 2026.
9. Pilbara Iron Company (Services) Pty Ltd 2026, *Response to Request for Further Information – Licence L8232/2008/2 (Category 54: Sewage Facility), Brockman Syncline 4 Mine*, submitted to the Department of Water and Environmental Regulation, 2 April 2026.

## Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions

Condition	Summary of Licence Holder's comment	Department's response
Condition 5 (Table 1): Design and construction / installation requirements for mine dewatering pipeline from BS4 to BS2 (Item 1)	<p>The Licence Holder acknowledged the Department's request (referenced in the Amendment Report) to confirm proposed dust management controls for the pipeline construction. They confirmed that water carts will be available throughout construction to manage dust emissions, including meeting the intent of sub-condition 5(g) requiring a water cart with water cannon to be available at all times.</p> <p>No amendments to the draft condition were requested.</p>	Noted. The requirement remains unchanged.
Condition 5 (Table 1): Design and construction / installation requirements for proposed / subsequent landfill facilities (Item 2)	<p>The Licence Holder requested removal of the requirement to locate facilities within low-permeability soils, stating that existing risk-based operating controls consistent with current Part V licences are sufficient to manage environmental risks. The Licence Holder considers the requirement an unnecessary additional design constraint not applied to comparable facilities, and advised its removal would support consistency across their operations for low-risk activities.</p>	<p>Noted. The Department acknowledges that the requirement to locate landfill facilities within low-permeability soils was proposed by the Licence Holder as a design and management condition/criterion in the supporting documentation. However, this requirement has been removed from the draft licence, and the corresponding criterion/control has also been removed from Section 2.2.3 of the Amendment Report.</p> <p>The Department considers that other conditions in the licence, including groundwater separation, stormwater diversion, and containment of water that has come into contact with waste, provide sufficient controls to manage leachate risk.</p>
Condition 9 (Table 2): Operational requirements for Brockman Syncline 4 WWTP (village), Nammuldi WWTP (village) and Brockman Syncline 4 Mine WWTP (Item 3)	<p>The Licence Holder requested revision of the containment requirement to align with the existing approved WWTP infrastructure and current licence framework. They advised that the approved design includes buried concrete tanks with surrounding bunding and existing spill management measures, and considers the proposed wording to imply a higher containment standard. The Licence Holder proposed amended wording requiring appropriate containment and spill management measures to minimise the risk of wastewater releases</p>	Noted. The Department accepts the revised wording as it aligns with the existing approved WWTP infrastructure and maintains a performance-based requirement for containment and spill management. The change is not expected to significantly alter the environmental risk profile.

Condition	Summary of Licence Holder's comment	Department's response
<p>Condition 9 (Table 2): Operational requirements for Brockman Syncline 4 WWTP (village), Nammuldi WWTP (village) and Brockman Syncline 4 Mine WWTP (Item 3)</p>	<p>The Licence Holder requested removal of the requirement to identify signs of vegetation stress or death during daily irrigation inspections, stating it is subjective and not easily measurable. They consider the intent is already addressed through existing inspection and management requirements (e.g. ponding, runoff, sprinkler performance, and infrastructure integrity), which provide more measurable and auditable indicators of sprayfield performance.</p>	<p>The Department considers this requirement appropriate to ensure early identification of vegetation stress as an outcome-based indicator of sprayfield performance. This supports the management of nutrient-related risks during routine operation and provides a practical means of identifying potential issues not captured by process-based controls alone.</p> <p>The condition will be retained as drafted.</p>
<p>Condition 9 (Table 2): Operational requirements for landfill sites (Item 5)</p>	<p>The Licence Holder requested removal of the requirements relating to preventing windblown waste leaving the facility and monthly collection of waste outside the tipping area. They proposed an alternative condition: <i>"Fencing surrounding the perimeter of putrescible landfill facilities must be regularly inspected for damage and cleared of windblown waste."</i></p> <p>The Licence Holder advised this would maintain the intent through a more risk-based, outcomes-focused approach, supported by existing controls such as fencing, waste cover, and routine site management.</p>	<p>The Department does not support the proposed changes. The existing conditions were included as an additional regulatory control to manage windblown waste, as no specific controls were proposed by the Licence Holder. These conditions are also consistent with those applied at the Licence Holder's other premises and is in line with regulation 8 of the <i>Environmental Protection (Rural Landfill) Regulations 2002</i>.</p> <p>Requirement has therefore been retained.</p>