Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

Application for Licence Amendment

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

Licence Number	L8249/2008/3
Licence Holder	Focus Operations Pty Ltd
ACN	115 821 255
File Number	APP-0032968
Premises	Three Mile Hill Gold Project COOLGARDIE WA 6429 Legal description – Mining tenements G15/7, G15/46, M15/23, M15/150, M15/237, M15/277, M15/412, M15/630, M15/827, M15/966, M15/1262, M15/1293, M15/1433, M15/1434, M15/1461, M15/1114, M15/154, M15/645, M15/646, M15/660, M15/958, M15/1294, M15/1432, M15/1788, L15/161, L15/95, L15/459, M15/877 and M15/595 As defined by the Premises map depicted in Schedule 1 of the Revised Licence
Date of Report	1 May 2026
Decision	Revised licence granted

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1. Decision summary

Licence L8249/2008/3 is held by Focus Operations Pty Ltd (licence holder) for the Three Mile Hill Gold Project (the Premises), located within Mining Tenements G15/7, G15/46, M15/23, M15/150, M15/237, M15/277, M15/412, M15/630, M15/827, M15/966, M15/1262, M15/1293, M15/1433, M15/1434, M15/1461, M15/1114, M15/154, M15/645, M15/646, M15/660, M15/958, M15/1294, M15/1432, M15/1788, L15/161, L15/95, L15/459, M15/877 and M15/595.

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 L8249/2008/3 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 23 December 2025, the licence holder submitted an application to the department to amend Licence L8249/2008/3 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). Table 1 below outlines the proposed changes to the existing Licence.

Table 1: Proposed design / throughput capacity changes and amendment summary

Category	Current design / throughput capacity	Proposed design / throughput capacity	Description of proposed amendment
Category 5: Processing or beneficiation of metallic or non-metallic ore	1,500,000 tonnes per annual period	1,800,000 tonnes per annual period	• Construction and operation of the Three Mile Hill Mill upgrades (outlined in Section 2.3.1). • Reprocessing of historic tailings and vat leach stockpiles. • Toll treating of third-party ores. • Construction and operation of washdown bays, oily water separators and refuse drying pads. • Discharge of process/ tailings decant water to gravity dam
Category 6: Mine dewatering	475,000 kL per annual period	950,000 tonnes per annual period	Construction and operation of additional dewatering pipelines to Big Blow and Empress open pits.

Category	Current design / throughput capacity	Proposed design / throughput capacity	Description of proposed amendment
Category 12: Screening etc. of material	This is a new category proposed to be added to the existing licence	200,000 tonnes per annual period	• Operation of two new crushing and screening plants, constructed under W6888/2024/1 and W6967/2024/1. • Extension of prescribed premises boundary.
Category 89: Putrescible landfill site	200 tonnes per annual period	4,750 tonnes per annual period	• Construction and operation of two additional landfill locations at the Three Mile Hill South waste rock landform and Dreadnought waste dump. • Increased deposition of waste at existing landfills on the premises.

2.3 Category 5: Processing or beneficiation of metallic ore

2.3.1 Three Mile Hill Mill upgrades

This amendment application seeks to increase the category 5 approved throughput from 1.5 million tonnes per annum (mtpa) to 1.8 mtpa. The increase will be achieved through upgrades to the Three Mile Hill gold processing plant. These upgrades will include the following:

- Increased mill utilisation through improved Run of Mine (ROM) supply.
- Replacement of the existing product screen and ROM bin with modern equivalents.
- Improved blending flexibility.
- Increasing electrowinning cell capacity by adding anodes and cathodes and installing a third electrowinning cell.
- Installation of a second oxygen pump into the existing leach tank.
- Laboratory capability uplift.
- Additional water supply from existing borefields and pit dewatering, integrated into a networked approach.
- Pre-treatment of ROM feed to remove tramp metal and minimise crusher blockages.
- Larger trash screen to accommodate higher oxide ore feed.
- Larger gravity screen to improve gravity gold recovery.

Figure 1 below shows the layout of the processing plant with proposed modifications. No new discharge points, emission types, or material process changes are proposed to be introduced.

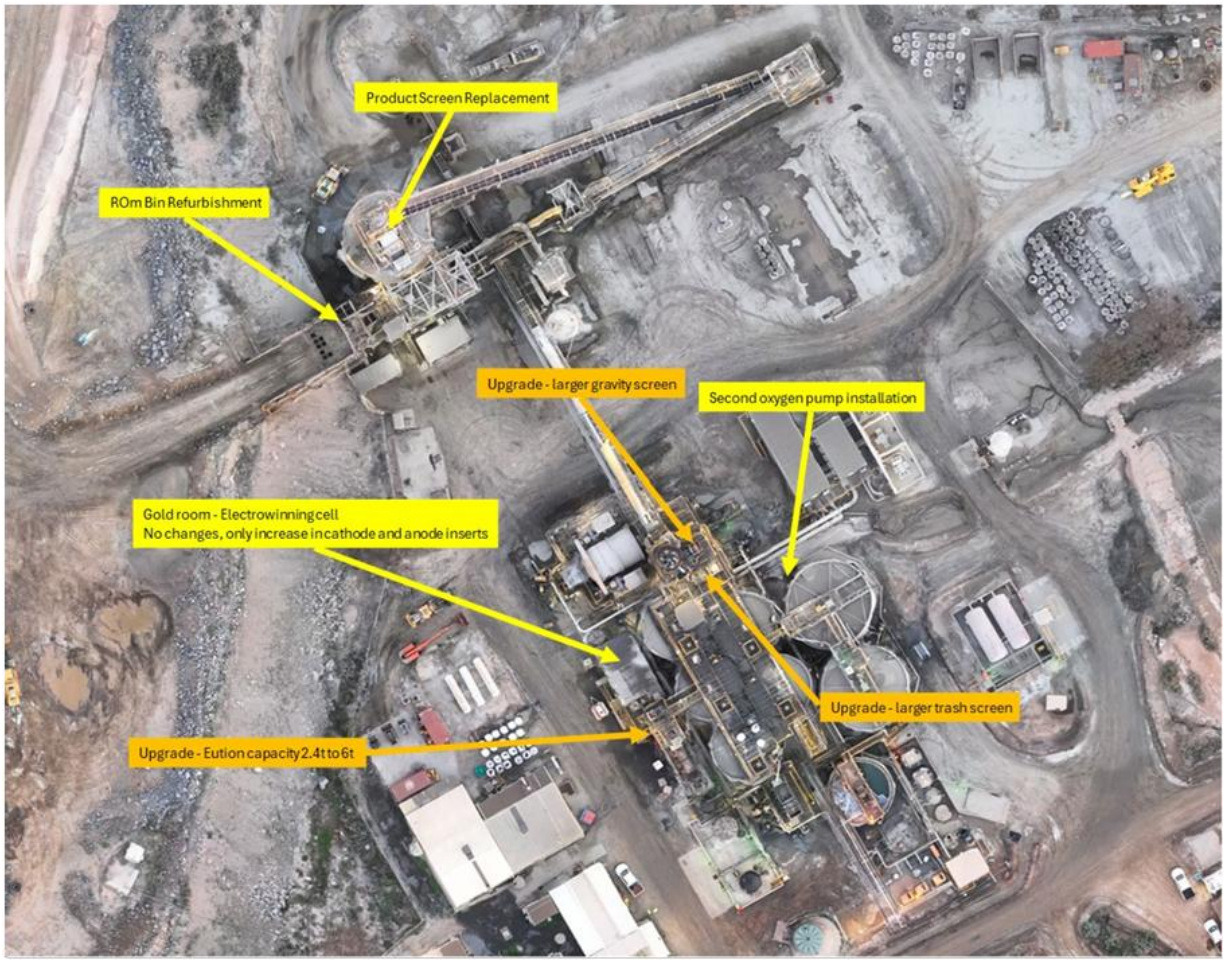

Figure 1: Processing plant with annotations of proposed modifications

2.3.2 Reprocessing of historic tailings and vat leach stockpiles

The licence holder is proposing to reclaim and process historic tailings and vat leach stockpiles from within the prescribed premises. These stockpiles have been sampled, and analysis shows they have sufficient gold resources to be used to supplement higher grade ore feed from approved mining operations. The stockpiles proposed to be reclaimed are as follows in Table 2. The timeframe for reprocessing each stockpile is subject to approval from the Department of Mines, Petroleum and Exploration (DMPE). A Mining Development and Closure Proposal (MDCP) is currently under assessment by DMPE, with reprocessing of stockpiles proposed to occur within the life of mine which extends to 2035.

Tailings from the historic stockpiles are proposed to be directed to the approved Greenfields in-pit tailings storage facility. By this time, the facility will have been operating for approximately 12 months, which is expected to provide a tailings buffer to any potential contaminant loads that may occur from the historic stockpiles.

Monitoring of groundwater will be maintained throughout the operation of the Greenfields in-pit Tailings Storage Facility (TSF) in accordance with monitoring bore requirements (Condition 34 of Licence L8249).

Table 2: Historic stockpiles to be reclaimed and processed

Map ID	Name	Description	Volume (m^3)	Tonnes	Area (ha)
1	Perseverance	Historic tailings / 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

Summary of preliminary site investigation

A preliminary site investigation was undertaken by the licence holder in 2012 to identify and investigate potentially contaminated sites (Focus, 2012). Five sites were identified: Lady Loch, Perseverance, Redemption, Dreadnought and Bayleys. All five sites are currently classified as '*possibly contaminated - investigation required*' in accordance with *Contaminated Sites Act 2003*, as determined following submission of the preliminary site investigation results to the department. Four of the sites investigated have been proposed to be reprocessed and include: Lady Loch, Perseverance, Redemption and Dreadnought. Site 5 (Golden Bar) is yet to be investigated, however is also proposed to be reprocessed. The Bayleys site has not been proposed to be reclaimed.

Perseverance (site 1) is a demolished plant site, heap leach pad and TSF located approximately 3.5 km south of Coolgardie. The heap leach pad was originally constructed with a plastic liner; however, the liner has largely deteriorated due to ultraviolet damage and other environmental factors.

The Lady Loch (site 2) historical TSF is located to the east of Perseverance and occupies an area of approximately 1.85 hectares. During the site investigation, a number of historical mine shafts and brick pads were found, indicating the area was a historical plant site or battery.

The Dreadnought historical TSF and mill site (site 3) is located further south of Coolgardie and occupies an area of approximately 2.8 hectares. Three sumps, occupying 0.8 hectares of land, are located on the eastern side of the TSF and were most likely used for tailings storage. Additionally, a lined water dam is located north-west of the mill site and is assumed to hold recycled process water which has not yet been rehabilitated.

The Redemption historical tailings area (Site 4) occupies approximately 0.32 hectares. The investigation identified that the tailings facility remains partially intact, with scattered tailings present around the historical tailings dam, along with remnants of old workings.

Results of the preliminary site investigation indicate that metal concentrations within stockpiled materials are elevated. At several sites, contamination is likely to extend both laterally and vertically beyond the footprint of the historical facilities. The primary contaminants identified at the sites are arsenic and/or mercury, with vertical contamination extents ranging from less than 1 metre to at least 7 metres. Elevated concentrations of other elements, including copper, nickel, zinc, manganese, cobalt, and chromium, were also identified.

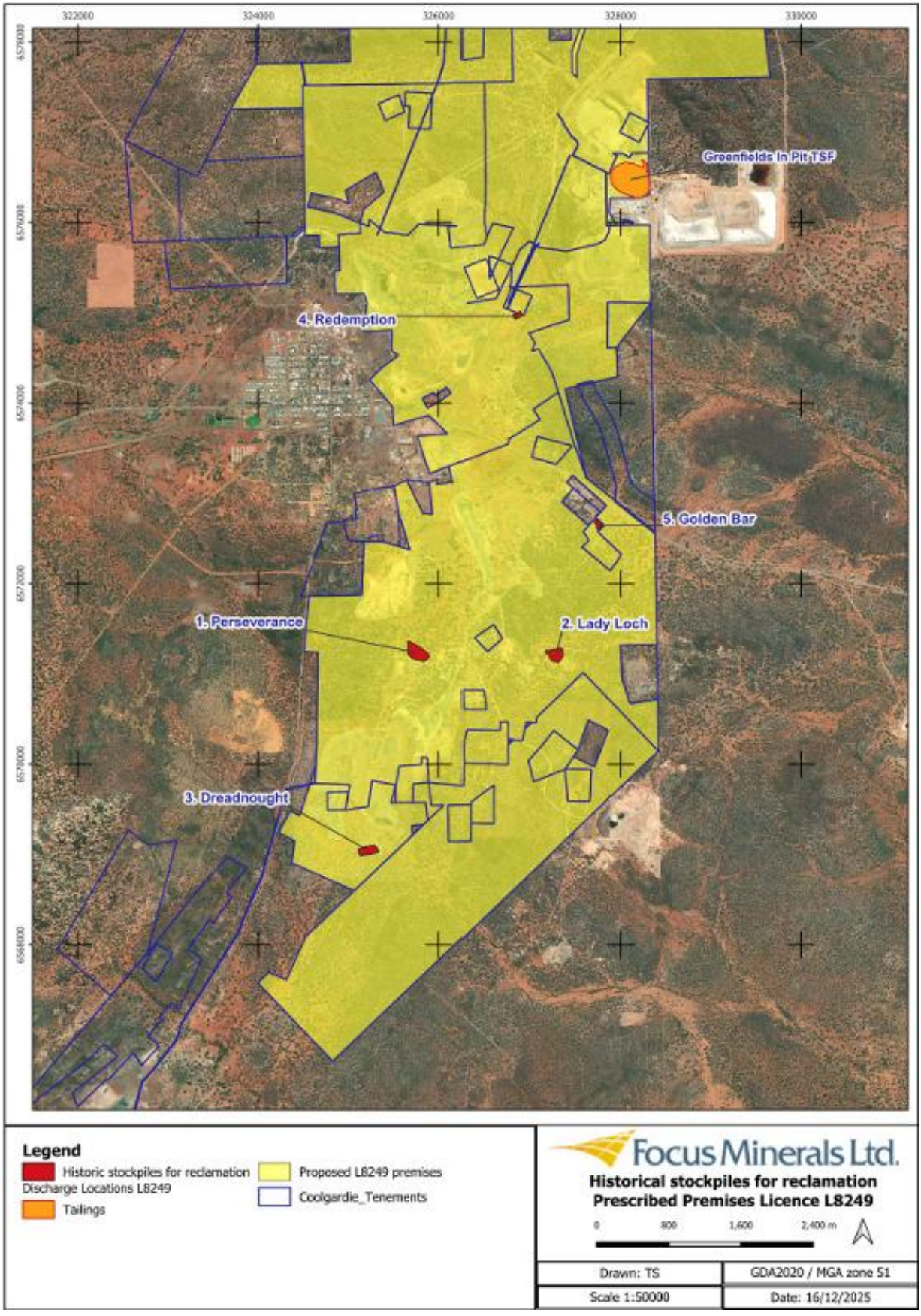

Figure 2: Location of historic stockpiles for reclamation

2.3.3 Toll treating of third-party ores

This amendment seeks approval for the toll treatment of ores from third-party, small-scale campaign mining operations to supplement ore processing at the premises. Toll treating involves the crushing, milling or refining of ore on behalf of another company. As ore processing and the discharge of tailings are already authorised under the current Licence, no additional emission sources or discharge pathways have been identified.

However, the environmental risk profile of toll-treated ore may differ from that of ore sourced from the licence holder's own operations, depending on its origin, composition and volume. The licence holder has proposed that ore derived from an operation approved under the *Mining Act 1978* is more likely to be predictable and well characterised due to the regulatory controls and oversight applying to such operations.

Accordingly, the licence holder has proposed a risk assessment process to evaluate third-party ores prior to acceptance for toll treatment, considering the regulatory status of the source operation, the availability of ore and tailings characterisation information, the anticipated volume of tailings relative to annual deposition, and the potential presence of deleterious materials. Only ores for which no additional or unacceptable environmental risks are identified would be accepted for toll treatment.

2.3.4 Gravity dam as containment for tailings decant return/process water

The licence holder is seeking approval to discharge tailings decant return / process water to the existing gravity dam. This is to optimise management of water quality to send the tailings decant water to the gravity dam for blending with the existing water sources. Currently, the gravity dam only receives mine dewater and is used only for processing activities.

The gravity dam is lined with HDPE with a permeability of 10^{-9} m/s. The licence holder has proposed to maintain a minimal operational freeboard of 500 mm.

2.3.5 Construction of additional infrastructure

Licence holder is seeking to establish washdown bays, oily water separators and refuse drying pads on the premises. A washdown bay is proposed to be constructed at each of the operational mining centers (Bonnievale, CNX, Three Mile Hill, Alicia / Dreadnought / Undaunted) to maintain vehicle hygiene and prevent the spread of soil and plant material.

Each washdown bay is to be constructed generally in accordance with the layout in Figure 3. The wash-bays will be constructed on an impermeable concrete pad or steel / aluminium trays with 300 mm containment walls. Washdown water will drain to a sump and be pumped through an oily water separator. Oily wastewater will be collected in an Intermediate Bulk Container (IBC) for off-site disposal by licensed contractors, while treated water will be stored in tanks and used for dust suppression, with quarterly monitoring to ensure total petroleum hydrocarbon levels remain below 15 mg/L.

Excavated refuse (soil / rock) from the wash-bay and sump will be transferred to waste rock landforms (WRL) and dried within bunded drying cells (up to 1 m high) built from compacted waste rock (Figure 4). Once dried, materials may be incorporated into the WRL or repurposed as landfill cover.

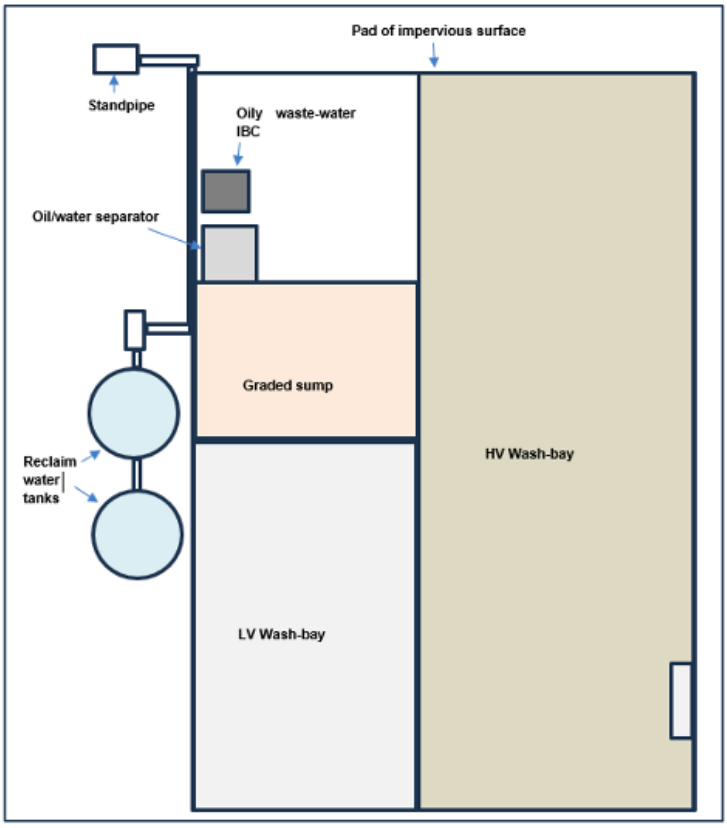

Figure 3: General arrangement for wash-bay layout

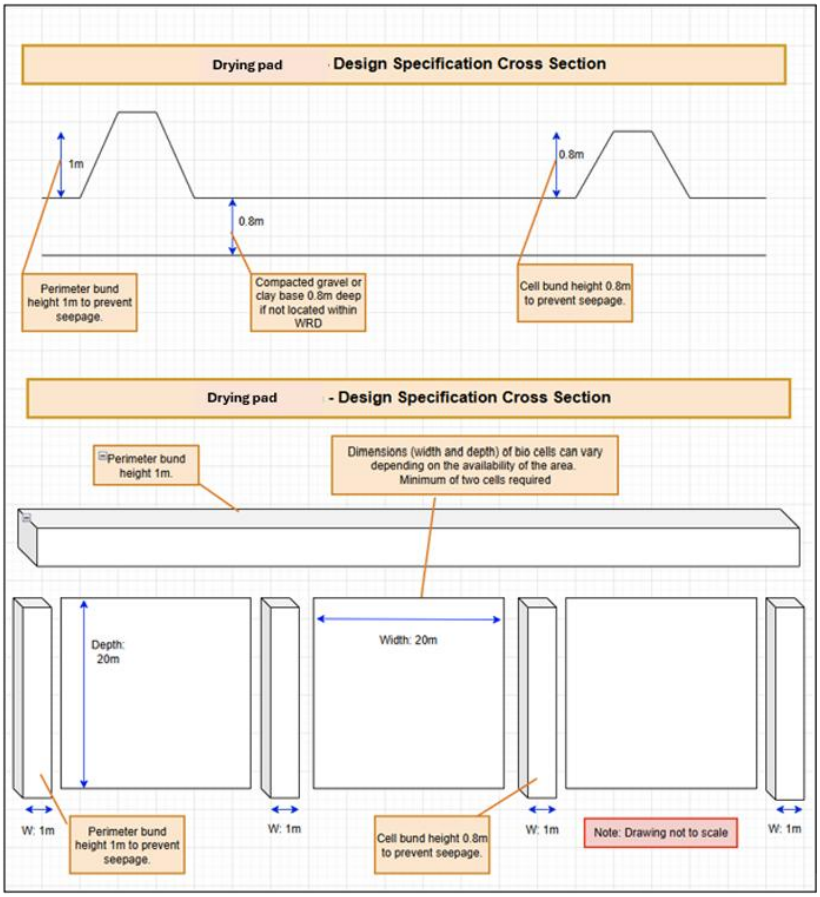

Figure 4: Drying cell within waste rock landform

2.4 Category 6: Mine dewatering

The licence holder has proposed to increase the total authorised dewatering volume at the premises from 475,000 tonnes per annum to 950,000 tonnes per annum. This is to allow for the inclusion of dewatering at the Big Blow and Empress open pits.

2.4.1 Dewatering discharge locations - Big Blow and Empress open pits

General Hydrogeology

The Coolgardie region is underlain by fractured greenstone bedrock that forms localised aquifers. Groundwater within these systems is generally saline to hypersaline, with storage limited to secondary porosity in discrete fracture zones. Recharge is also highly localised, occurring where water can infiltrate along fractures.

Aquifer permeability is controlled by structural features such as tectonic, decompression, and chemically weathered fractures. Open fractures associated with major faults and shear zones have been observed to depths of around 125 metres.

Big Blow open pit

The Big Blow open pit has been proposed to be added to the Licence as an authorised dewatering discharge location. Big Blow was mined circa 2023 and has a capacity of ~782,000 kL. Most of the mineralisation occurs in a steep, 10–20 m wide fault and in the broken rock (breccia) within the Burbanks Basalt. The Big Blow pit depth is at RL ~355 metres which is a depth of approximately 60 – 70 mbgl.

There is very little groundwater currently in the base of the pit, indicating that evaporation (~3,000 mm per annum) is occurring at a rate exceeding groundwater inflow at present. The Static Water Level (SWL) recorded in 2023 was 43.27 and 49.1 m, whilst monitoring bores recorded a SWL of 57.17 and 51.56 m in 2026 (Table 3). This indicates that groundwater may be drawing down due to evaporation of the seepage to pit and that the pit is acting as a sink.

The licence holder has proposed to construct a pipeline to Big Blow by tying into the existing pipeline to the Brilliant open pit (Figure 5). The new pipeline is to be contained within V trenches with pressure sensing and shut-off valves to reduce the potential for undetected leaks. Pipeline corridors will also contain scour pits to contain leaks.

Empress open pit

The licence holder is also seeking to add the Empress open pit as a dewatering discharge location. This pit is adjacent to the Alicia open pit that is currently being mined and would provide flexibility in managing the Alicia pit dewatering and subsequent dust suppression. Storing water for dust suppression in Empress pit will reduce the requirement to pump it 2.3 kilometres to the Brilliant open pit.

Empress pit depth is currently 55 metres and is below groundwater level. The closest monitoring bores are located at the Alicia and Dreadnought pits where the groundwater levels are approximately 44 and 57 m respectively (Table 3). Groundwater levels do not vary significantly due to rainfall events which shows the lack of rainfall recharge to the groundwater system and currently the status of the pit is likely of minimal flow through.

This pipeline is proposed to connect to the existing infrastructure at the Empress escapeway that facilitates dewatering of the Empress underground as shown by the pink line in Figure 5. The licence holder has proposed the same controls as listed above for the construction of the Empress dewatering pipeline.

Groundwater monitoring bore results have been provided for the Dreadnought, Alicia and Big Blow pits in Table 3. Results show similar water quality between pits with Total Dissolved Solids (TDS) indicating brackish to saline water.

Table 3: Groundwater sampling monitoring bore results

Monitoring Date	Location	Bore Name	Static Water Level	pH	TDS	EC (µS/cm)
August 2025	Dreadnought	21 DNRC001	45.43	7.49	9,490	13,081
	Alicia	21 ALRC001	59.14	7.55	2,106.5	29,883
	Big Blow	21 BBRC001	52.28	7.22	6,624	37,120
	Big Blow	21 BBRC002	51.39	7	20,445	17,342
December 2025	Dreadnought	21 DNRC001	44.69	7.23	10,296	15,938
	Alicia	21 ALRC001	48.97	6.93	23,127	35,845
	Big Blow	21 BBRC001	57.60	-	-	-
	Big Blow	21 BBRC002	51.48	-	-	-
February 2026	Dreadnought	21 DNRC001	45.22	7.36	7,488	10,663
	Alicia	21 ALRC001	59.25	7.06	18,180	26,355
	Big Blow	21 BBRC001	57.17	-	-	-
	Big Blow	21 BBRC002	51.56	-	-	-

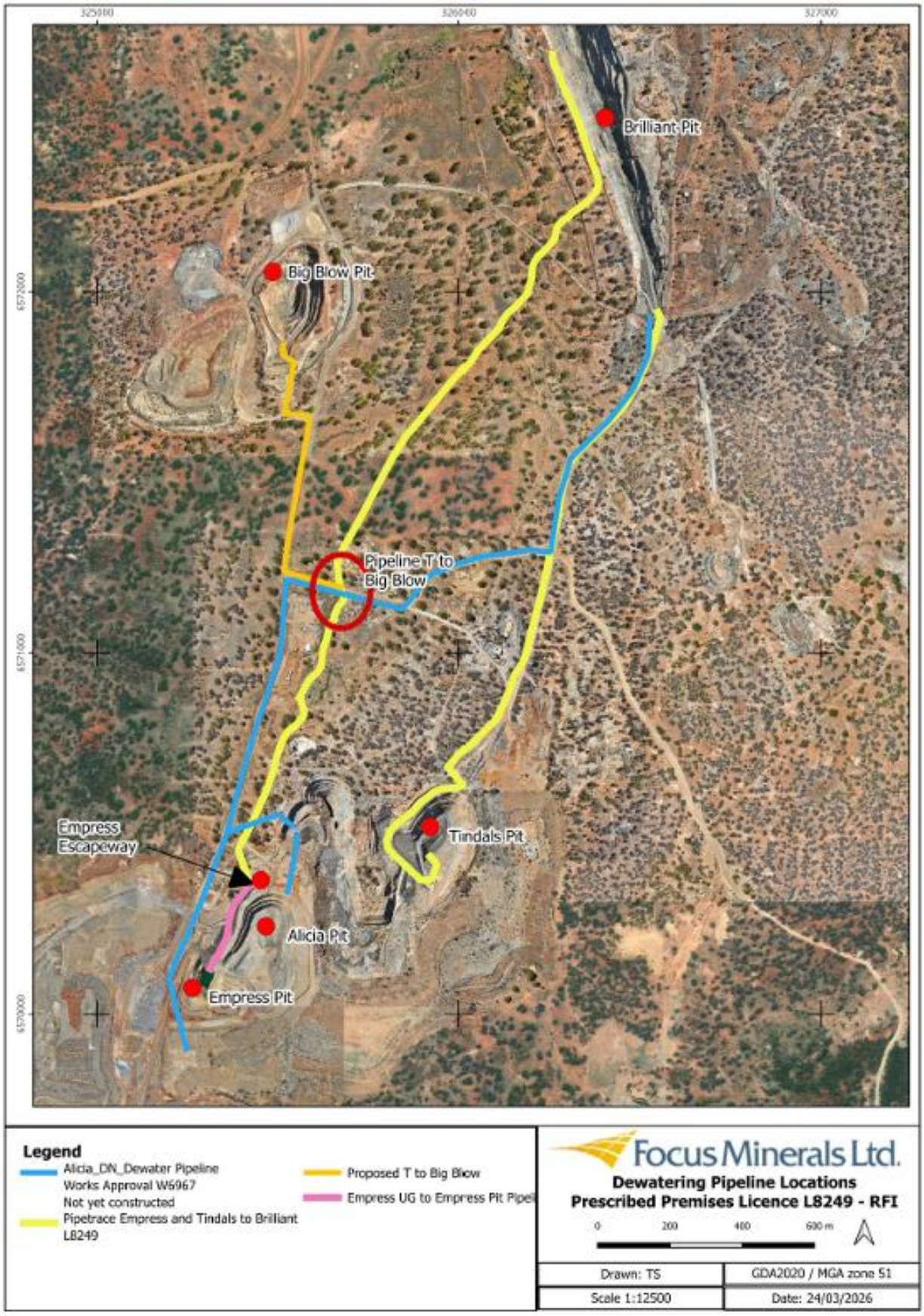

Figure 5: Proposed dewatering pipeline to Big Blow (orange) and Empress pit (pink)

2.5 Category 12: Screening etc. of material

The construction and time-limited operations of two crushing and screening plants were authorised under Works Approvals W6888/2024/1 and W6967/2024/1. As part of this amendment, the licence holder has requested the continued operation of the two crushing and screening plants be authorised under Licence L8249/2008/3. Each Works Approval was granted for a category 12 throughput of 100,000 tonnes per annum and therefore this amendment seeks a capacity of 200,000 tonnes per annum under category 12.

Environmental Compliance Reports (ECR) were received on 29 March 2025 and 26 May 2025 for W6888/2024/1 and W6967/2024/1 respectively. These reports were found to be compliant with associated construction requirements conditioned on the Works Approvals on 20 May 2025 and 11 August 2025.

This activity produces road base for constructing and maintaining hardstands and roads. Additionally, for producing stemming material, used to backfill drill holes prior to the blast phase of mining operations.

The licence holder is seeking to expand the locations authorised for operating these plants to enable crushing as close as possible to source material and reduce vehicle movements in transporting the material. This includes a location at the Greenfields Waste Rock Landform Laydown, the Three Mile Hill ROM, the CNX Waste dump / ROM and at the proposed Dreadnought ROM. Figure 6 details these locations.

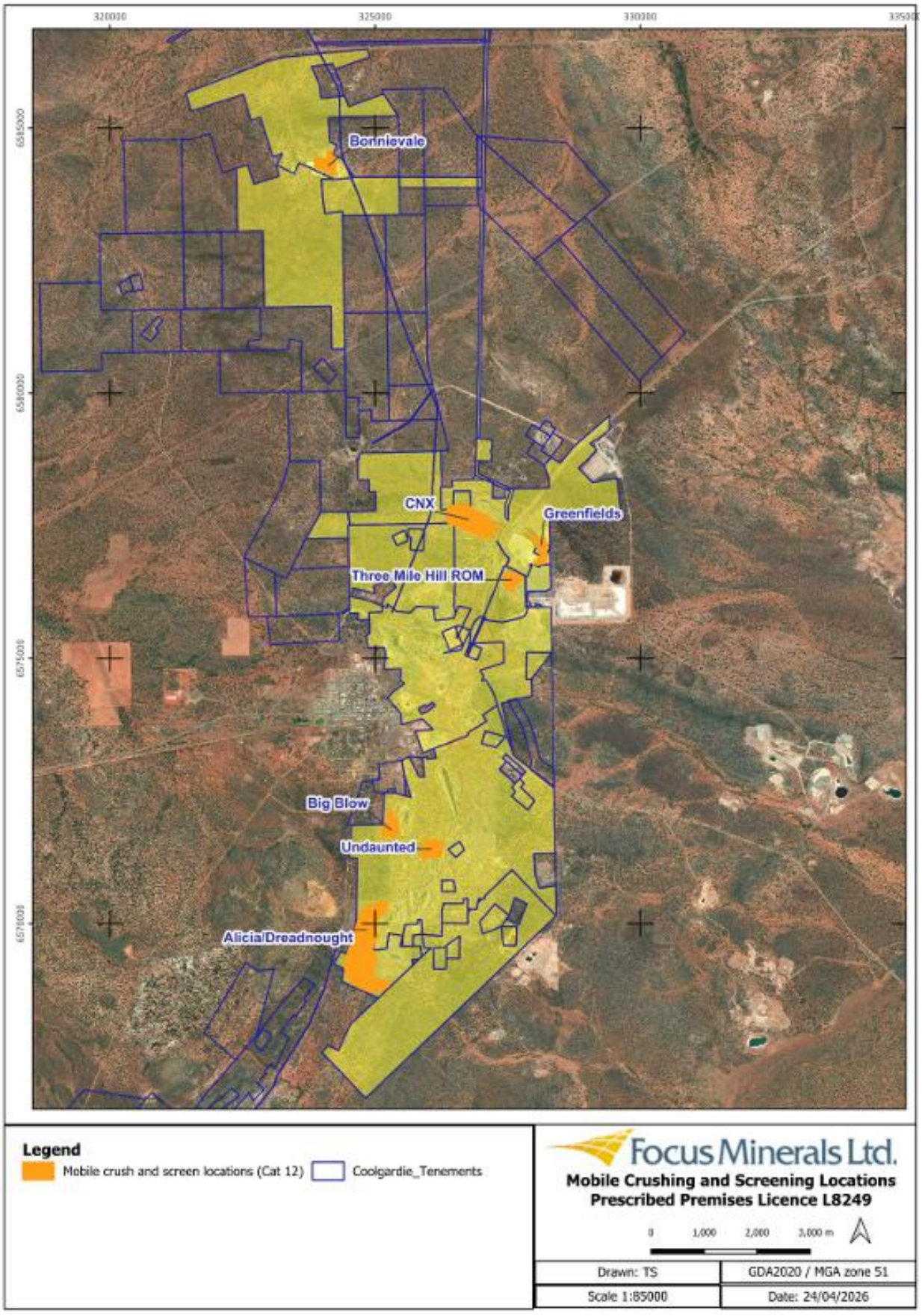

Figure 6: Mobile crushing and screening locations

2.6 Category 89: Putrescible landfill site

The licence holder is seeking to increase the total deposition to the landfills on the premises under category 89 from 200 to 4,750 tonnes per annum (tpa). The Greenfields, Dreadnought and Tindals landfills are currently authorised under Licence L8249/2008/3 for 200 tpa. Table 3 displays the proposed increases in tonnage for these landfills, as well as the introduction of the new Three Mile Hill landfill.

Table 4: Landfill approved and proposed deposition

Location	Approved Tonnage (tpa)	Instrument	Proposed tonnage (tpa)
Greenfields landfill	200	L8249/2008/3	200
Dreadnought landfill			2,000
Tindals landfill			250
Bonnievale south landfill	200	W6888/2024/1 L8249/2008/3	2,000
Three Mile Hill landfill	N/A	N/A	250
		Total	**4,750**

It is also proposed that the landfills on the premises will accept additional waste types and greater quantities of waste. Table 4 provides details of the proposed changes.

Table 5: Landfill proposed / permitted waste types

Landfill class	Waste Types	Landfills	Current Authorisation	Proposed change
Class II – Putrescible landfill (Category 89)	• Clean Fill • Inert Waste Type 1 • Putrescible Waste	• Greenfields landfill • Bonnievale south landfill • Dreadnought landfill • Tindals landfill • Three Mile Hill landfill	Greenfields, Bonnievale, Dreadnought and Tindals landfills all authorised under Licence L8249/2008/3	Include Three Mile Hill landfill as a location able to accept clean fill, inert waste type 1 and putrescible waste.
	Inert Waste Type 2	• Greenfields landfill • Three Mile Hill landfill	Disposal of conveyor rubber not previously authorised under Licence L8249/2008/3	Disposal of conveyor rubber of up to 20 tonnes per annum at either landfill.
		Bonnievale south landfill	Disposal of tyres at Bonnievale not previously authorised under Licence L8249/2008/3	Disposal of up to 500 tyres per annum.

Class II – Putrescible landfill (Category 89)	Inert Waste Type 2	Dreadnought landfill	Disposal of up to 2000 tyres	No changes proposed.
	Special Wastes Type 1 (asbestos)	• Greenfields landfill • Bonnievale south landfill • Dreadnought landfill	Special Wastes Type 1 not previously authorised under Licence L8249/2008/3	Disposal of up to 16 tonnes per annum of personal protective equipment and air filters associated with the handling of / exposure to potential fibrous waste rock material (naturally occurring asbestos).

2.6.1 Three Mill Hill and Dreadnought Landfills

An additional landfill location has been proposed at the Three Mile Hill South waste rock landform location (Figure 7). This location is elevated within the landscape on the waste dump, approximately 10 metres above the surrounding topography. Due to this elevated location, the landfill will be greater than 3 metres above the closest groundwater.

The licence holder has proposed for the Three Mile Hill landfill to be permitted to take clean fill, inert waste type 1, putrescible waste and up to 20 tonnes per annum of conveyor rubber. The total tonnage proposed to be accepted by this landfill is 250 tpa.

The existing Dreadnought landfill has been rehabilitated in accordance with the waste dump progressive rehabilitation plan during mining operations. The licence holder proposes to relocate this landfill within the already approved Alicia/Dreadnought waste dump. Additionally, the landfill is to be permitted to take clean fill, inert waste type 1, putrescible waste, tyres and special waste type 1 as per Table 5.

Both landfills are to be maintained in accordance with existing requirements within the Licence. Condition 15 requires the landfills to be managed in a manner such that:

- Adequate measures shall be implemented to ensure that waste is contained within the landfill containment infrastructure.
- Waste shall be stored within a defined trench or within an area enclosed by earth bunds.
- Tipping area shall be less than 30 metres in length.
- Each trench to have the dimensions of 30 m long, 2 m wide and 3 m deep.
- A suitable barrier is maintained to prevent windblown waste leaving the trench.
- Signage installed and clearly visible at the landfill identifying the following as a minimum:
    - (i) wastes that may be accepted; and
    - (ii) wastes that are not to be accepted.
- No waste is to be burnt and fire fighting gear shall be readily available.

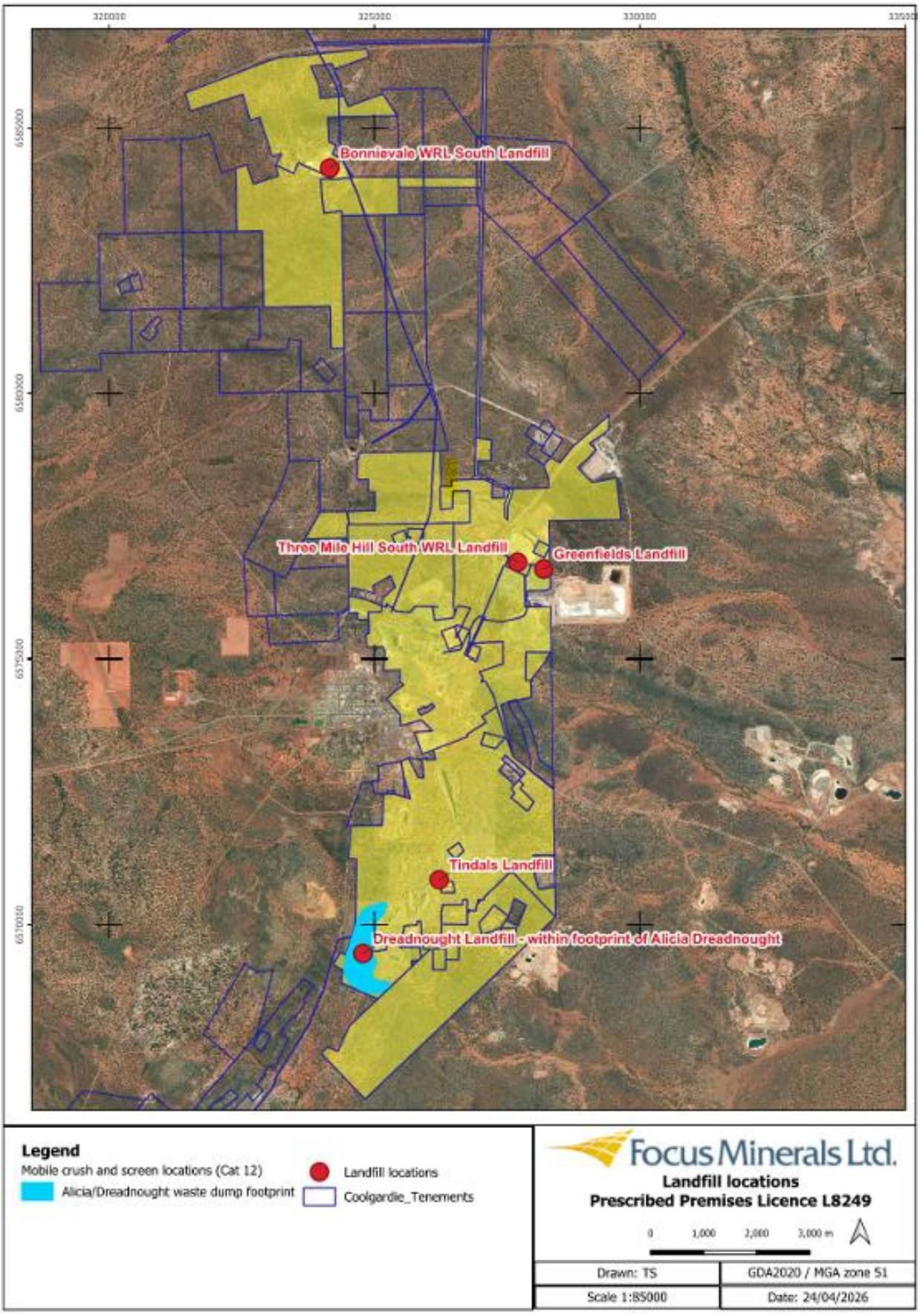

Figure 7: Landfill locations

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 Table 6 below. Table 6 also details the proposed control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

Table 6: Licence holder controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Construction of Three Mile Hill process plant upgrades, dewatering pipelines to Big Blow and Empress Pits, landfills and associated category 5 infrastructure (washdown bays, oily water separators and refuse drying pads)	Air/windborne pathway	• Water cart to be present at all times during construction activities to manage dust emissions • Visual monitoring of dust levels and stopping activities under extreme dust conditions (i.e., high winds towards public road).
Noise			• Maintaining a stakeholder engagement strategy, including complaints management system.
Operation			
Dust	Operation of crushing and screening plants, processing plant and associated category 5 and 12 infrastructure Vehicle movements on unsealed roads	Air/windborne pathway	• Water cart to be present at all times during operation to manage dust emissions. • Crusher feed to be wetted down prior to the crushing process to minimise dust emissions. • Visual monitoring of dust levels and stopping activities under extreme dust conditions (i.e., high winds towards public road). The Delegated Officer notes that the crushing plant is equipped with water sprays as an additional control for dust.

Emission	Sources	Potential pathways	Proposed controls
Noise	Operation of crushing and screening plants, processing plant and associated category 5 and 12 infrastructure Vehicle movements on unsealed roads	Air/windborne pathway	• Operation of plants to be limited to daylight hours to avoid night-time noise emissions. • Maintaining a stakeholder engagement strategy, including complaints management system. • Compliance with Noise Regulation requirements. • Vehicle and mobile plant movement limited to the Development Envelope and tracks/roads.
Sediment laden stormwater		Overland runoff	• Bunding to divert stormwater around the crushing and screening location as well as contain potentially contaminated stormwater within the crushing and screening locations.
Hydrocarbon spills and leaks from machinery and equipment		Direct discharge to land	• Plants to be maintained in accordance with manufacturers' specifications. • Refueling will occur offsite within the Mill Operation Area. • Spill kits will be available or nearby to areas where there is a risk of hydrocarbon spills. • Daily inspections of infrastructure. • Contaminated material disposed via suitable licensed contractor to an approved facility.
Hydrocarbons in water used for dust suppression			The water for use in dust suppression is to be monitored quarterly to ensure total petroleum hydrocarbons are < 15 mg/L.
Hypersaline mine dewater	Deposition of mine dewater into Big Blow and Empress pits	Overtopping of pits	Freeboard 4 m below crest level.
		Vertical infiltration and lateral migration of pit water	Big Blow and Empress pits likely to act as sinks.
Hypersaline mine dewater	Deposition of mine dewater into Big Blow and Empress pits	Pipeline leaks or rupture	• Pipeline to be contained within V trenches with pressure sensing shut-off valves. • Pipeline corridors to contain scour pits to contain leaks should they occur. • Daily inspections for visual integrity and leaks (during operation).

Emission	Sources	Potential pathways	Proposed controls
Windblown waste	Discharge of waste to landfills	Air/windborne pathway	• Active tipping area will be maintained to less than 20 meters in length and covered at least twice monthly to prevent windblown waste. • Landfill to be inspected weekly with windblown waste to be collected and returned to the trench. <u>Asbestos</u> Asbestos contaminated waste to be managed in accordance with the Fibrous Minerals Management Plan (2025): • Waste Disposal Registers shall be created and maintained to monitor and record the quantity and location of wastes. • Small volumes of waste that may contain mineral fibrous material shall be bagged and placed in the designated bins. • Bins placed in areas where fibrous minerals waste material is likely to be encountered and labelled appropriately. • Any material suspected to contain fibrous minerals shall be dampened regularly to prevent dust emission. • GPS located of any buried fibrous minerals waste must be recorded and the location signposted.
Leachate from base of landfills	Discharge of waste to landfills	Infiltration to groundwater	• Landfill trenches will be covered at least twice monthly with low permeability materials restricting drainage of water into the waste material, preventing generation of leachate. • Stormwater is to be diverted away from the trench.
Stormwater runoff / contaminated storm water		Overland runoff	• Bunding will be constructed to divert surface run-off away from trenches.
Process / tailings decant water	Discharge of process / tailings decant water to gravity dam	Overtopping of gravity dam	• A minimum operational freeboard of 500 mm to be maintained.
		Pipeline leaks or rupture	• Pipeline to be contained within V trenches with pressure sensing shut-off valves. • Pipeline corridors to contain scour pits to contain leaks should they occur. • Daily inspections for visual integrity and leaks (during operation).

Emission	Sources	Potential pathways	Proposed controls
Tailings	Toll treating third party ore and reprocessing historic tailings and vat leach stockpiles for deposition into the Greenfields TSF	Pipeline leaks or rupture	• Pipeline to be contained within V trenches with pressure sensing shut-off valves. • Pipeline corridors to contain scour pits to contain leaks should they occur. • Daily inspections for visual integrity and leaks (during operation).
		Seepage through base of pit	• Constructed with a permeability equal to, or less, than 10^{-7} m/s. Ore received from third parties to be risk assessed by licence holder based on the following: • Whether ore is derived from a *Mining Act 1978* approval operation. • Has an ore / metallurgical test-work / tailings characterisation been completed. • What is the total volume of expected tailings and their percentage of annual deposition. • Whether there are any deleterious materials within the tailings (potentially acid forming, potentially fibrous, naturally occurring radioactive or saline materials etc.).
		Overtopping of pit and stormwater runoff	• A minimum operational freeboard of 500 mm to be maintained.
Tailings	Reclaiming and reprocessing historic tailings and at leach stockpiles	Direct discharge to land	• No controls proposed.

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 6 below provides a summary of potential human and 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 7: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	**Distance from prescribed activity**
Mt. Burges Homestead	Approximately 2.5 km west of the prescribed premises boundary
Coolgardie Townsite	Approximately 3.5 km southwest of the processing plant and 1.8 km northwest of the closest crushing and screening location.
Residential receptor	Approximately 800 m to the northwest of the Big Blow WRL where the crushing and screening plant may be located.
Environmental receptors	**Distance from prescribed activity**
Native vegetation (including threatened and priority flora)	Priority 3 flora – *Grevillea georgeana* within a 1 km buffer of the premises boundary. Priority 1 flora – *Acacia websteri* within a 1 km buffer of the premises boundary. The Project area has been subjected to historical mining disturbances and more recent establishment of exploration activities (tracks and drill pads). The vegetation condition ranges from Excellent to Completely Degraded. The northern portion of the site is most heavily impacted, with the southern portion of the site mostly undisturbed and ranging from Good to Excellent condition. Native vegetation is located within the premises boundary
Threatened and/or priority fauna	One species of significance (Malleefowl) may occur with the project area, based on previous records and suitable habitat. Four specifies of conservation significance (Chuditch, Peregrine Falcon, Inland Hairstreak and Arid Bronze Asure Butterfly) can be regarded as possibly utilising the project area for some purpose at times.
Surface water drainage lines	Multiple drainage lines run through the prescribed premises (Figure 9).
Underlying groundwater (non-potable purposes)	The Project area is located within the Goldfields declared groundwater area. Local aquifers are generally containing saline to hypersaline groundwater. Based on the bore monitoring data, depth to the groundwater around the Brilliant pit ranges from 75 – 155 mbgl.
Cultural receptors	**Distance from prescribed activity**
Aboriginal heritage sites (Figure 8): 1. KURKUTJUTANA - ID3009 (Camp; Ritual / Ceremonial; Creation / Dreaming Narrative; Meeting Place; Plant Resource; Water Source) 2. KURRKURTI - ID1475 (Ritual / Ceremonial; Water Source) 3. COOLGARDIE STONES - ID1568 (Ritual / Ceremonial; Creation / Dreaming	Distance: 1. Partially within prescribed premises boundary 2. Partially within prescribed premises boundary 3. Partially within prescribed premises boundary 4. Partially within prescribed premises boundary 5. Approximately 2 km west of the prescribed premises boundary

Narrative; Traditional Structure) 4. TJUNTI-NYA – ID3008 (Ritual / Ceremonial; Creation / Dreaming Narrative; Other; Rock Shelter) 5. FUNERARY BOULDERS – ID1478 (Ritual / Ceremonial; Creation / Dreaming Narrative) 6. WHITE STONES – ID1558 (Ritual / Ceremonial; Creation / Dreaming Narrative; Traditional Structure) 7. PIIRA TUKURR – ID846 (Creation / Dreaming Narrative) 8. MINGARRI – ID1487 (Camp; Creation / Dreaming Narrative; Water Source)	6. Approximately 1.8 km west of the prescribed premises boundary 7. Approximately 400 m north of the prescribed premises boundary 8. Approximately 1.3 km west of the prescribed premises boundary

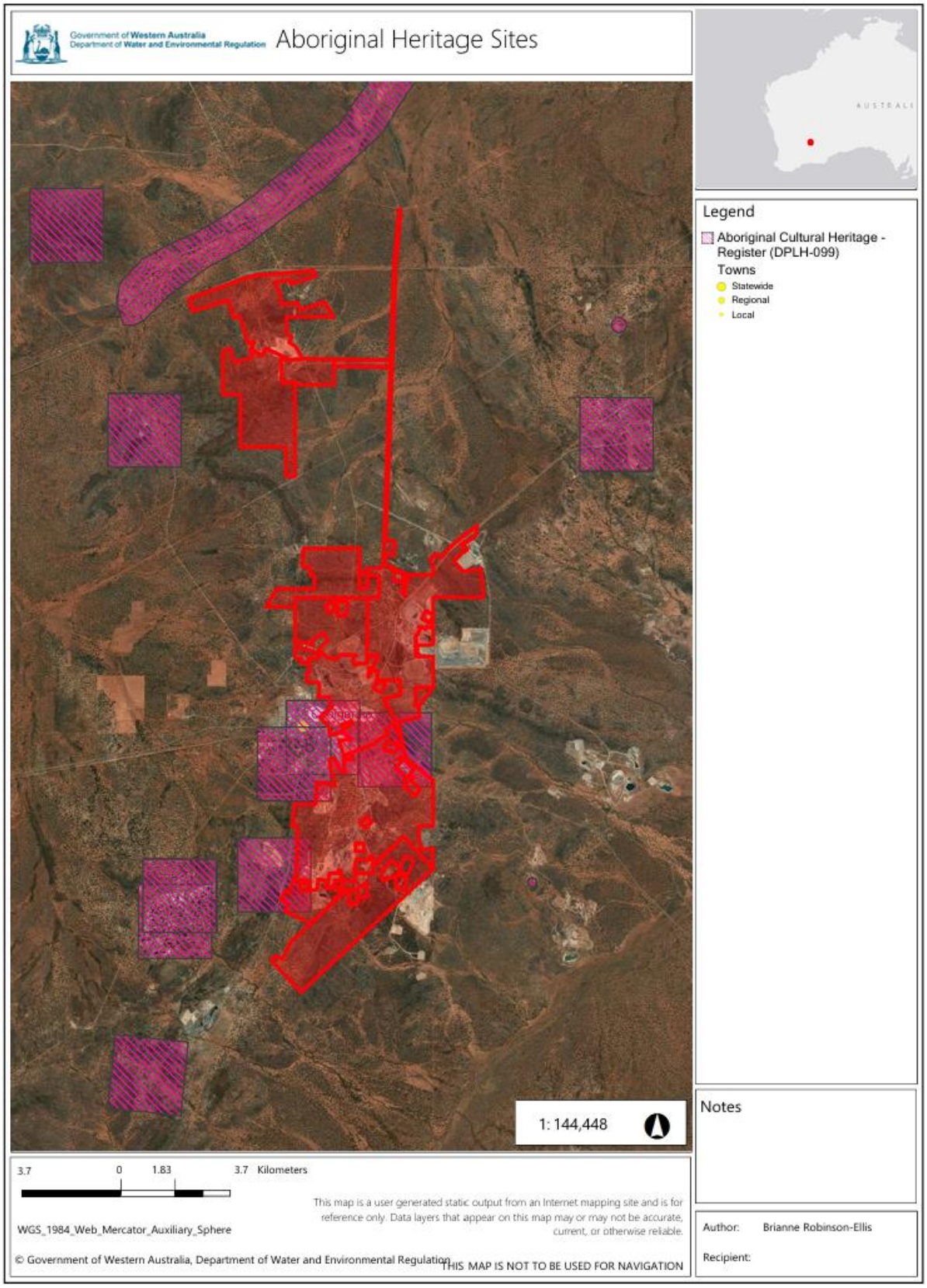

Figure 8: Distance to sensitive receptors – Aboriginal Heritage Sites

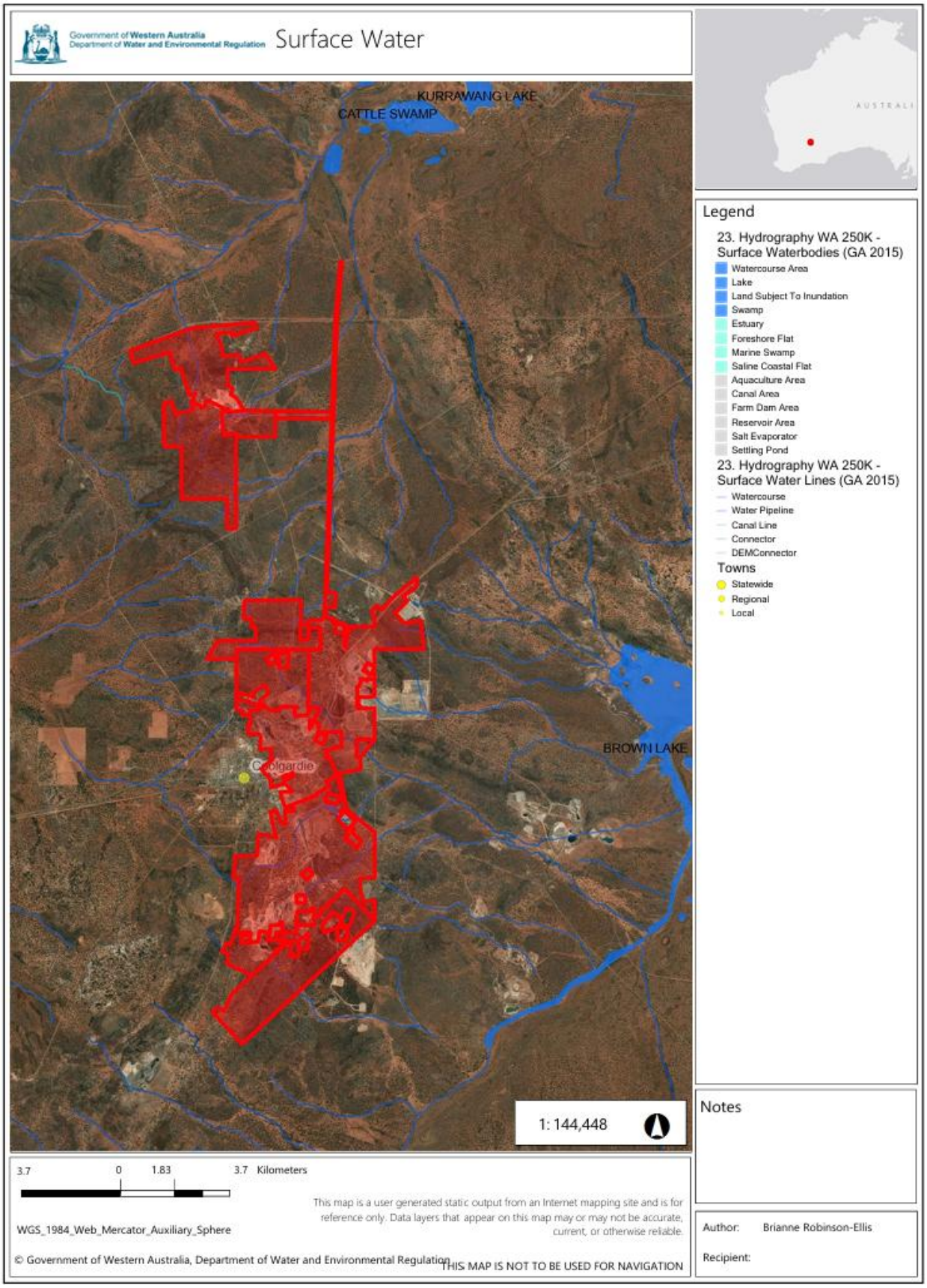

Figure 9: Distance to sensitive receptors - Surface Water

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 in-complete 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 8.

The Revised Licence L8249/2008/3 that accompanies this Amendment Report authorises emissions associated with the construction / operation of the Premises i.e. category 5, 6, 12 and 89 activities.

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

Table 8. Risk assessment of potential emissions and discharges from the Premises during construction and operation

Risk Event					**Risk rating[1]** **C = consequence** **L = likelihood**	**Licence holder's controls sufficient?**	**Conditions[2] of licence**	**Justification for additional regulatory controls/ DWER comments**
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence holder's controls**				
Construction								
Construction of Three Mile Hill plant upgrades, dewatering pipelines to Big Blow and Empress Pits, landfills and associated category 5 infrastructure (washdown bays, oily water separators and refuse drying pads)	Dust	**Pathway:** Air/windborne pathway **Impact:** Health and amenity	Native vegetation Residential receptor located approximately 800 m from the Big Blow WRL Fauna Surface water Aboriginal heritage sites	Refer to Section 3.1	C = Slight L = Unlikely **Low Risk**	Y	Condition 18 – Construction Requirements	The applicants' proposed controls have been conditioned in the licence as they have been determined to be adequate to manage this risk event.
	Noise			Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	N/A	N/A

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence holder's controls**				
Operation								
Operation of crushing and screening plants, processing plant and associated category 5 and 12 infrastructure Vehicle movements on unsealed roads	Dust	**Pathway:** Air/windborne pathway **Impact:** Health and amenity	Native vegetation Residential receptor located approximately 800 m from the Big Blow WRL Fauna Surface water Aboriginal heritage sites	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	Condition 22 – Operational Requirements	The applicants' proposed controls have been conditioned in the licence as they have been determined to be adequate to manage this risk event.
	Noise		Residential receptor located approximately 800 m from the Big Blow WRL Fauna	Refer to Section 3.1	C = Minor L = Possible **Medium Risk**	Y	N/A	Residential receptors are located more than 800 m from the Big Blow WRL where the crushing and screening plant will be located. The plant will be within the WRL on an active mine site and will be operated for short periods of time on a campaign basis. The EPAs Guidance for the *Assessment of Environmental Factors: Separation Distances between Industrial and Sensitive Land Uses 2005* indicates that a separation distance of 500-1000m is recommended for crushing and screening activities and residential receptors. Considering that the plant will be located more than 800 m away and operated for short periods at a time it is unlikely that significant impacts from noise will occur at the nearest residential receptor. The applicant will be required to comply with the Environmental Protection (Noise) Regulations 1997 at all times.

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence holder's controls**				
Operation of crushing and screening plants, processing plant and associated category 5 and 12 infrastructure Vehicle movements on unsealed roads	Sediment laden stormwater	**Pathway:** Overland runoff **Impact:** Ecosystem disturbance or impact to surface water quality	Native vegetation Surface water drainage lines Fauna (habitats)	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	Condition 22 – Operational Requirements	The applicants' proposed controls have been conditioned in the licence as they have been determined to be adequate to manage this risk event.
	Hydrocarbon spills and leaks from machinery / equipment	**Pathway:** Direct discharge to land **Impact:** Contamination of soils	Native vegetation Soil Fauna (habitats) Surface water	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	N/A	Crushing and screening operations are to be carried out only with the WRL areas and therefore any spill will be contained within the WRL footprint. The Environmental Protection (Unauthorised Discharges) Regulations 2004 apply. Additional regulatory controls are not required.
	Hydrocarbons in water used for dust suppression			Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	Condition 25 – Emissions to land – limits Condition 29 – Monitoring of emissions to land.	The applicants' proposed controls have been conditioned in the licence as they have been determined to be adequate to manage this risk event. Condition 25 limits the Total Petroleum Hydrocarbons (TPH) emitted to land to < 15 mg/l. TPH is also required to be monitored quarterly under condition 29.
Deposition of mine dewater into Big Blow and Empress Pits	Mine dewater	**Pathway:** Overtopping of pits **Impact:** Overland runoff of mine dewater, resulting in impacts to ecological health.	Native vegetation Surface water drainage lines Aboriginal heritage sites Fauna habitats	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Condition 25 – Emissions to land – limits Condition 26 – Emission targets to land	Empress and Big Blow pits have been included within the existing conditions 25 and 26 to limit freeboard to 4 m below crest level, with a target of 6 m below crest level.

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence holder's controls**				
Deposition of mine dewater into Big Blow and Empress Pits	Mine dewater	**Pathway:** Vertical infiltration and lateral migration of pit water **Impact:** Impacts to quality of groundwater resources	Native vegetation Groundwater	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	Condition 29 – Monitoring of Emissions to Land	Empress and Big Blow pits have been included within the existing condition 29 as emission points requiring monitoring. Monitoring will capture any movement of water which will identify any need for further action.
		Pathway: Pipeline leaks or rupture **Impact:** Direct discharge to land, resulting in impacts to ecological health	Native vegetation Surface water drainage lines Aboriginal heritage sites Fauna habitats	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	Condition 8 – Pipeline Construction Requirements Condition 14 – Inspection of infrastructure	Existing conditions for the management of tailings emissions on the Licence are deemed sufficient by the Delegated Officer (conditions 8 and 14).
Discharge of waste to landfills	Windblown waste	**Pathway:** Air/windborne pathway **Impact:** Impacts to ecosystem health	Native vegetation Local fauna Aboriginal heritage sites	Refer to Section 3.1	C = Slight L = Possible **Low Risk**	Y	Condition 15 – Management of waste requirements Condition 16 – Cover Requirements	The applicants' proposed controls have been conditioned in the licence as they have been determined to be adequate to manage this risk event. Condition 15 incudes the proposed controls to limit the risk of asbestos reaching receptors.
	Leachate from base of landfill	**Pathway:** Infiltration to groundwater **Impact:** Contamination of groundwater	Groundwater	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y		The applicants' proposed controls have been conditioned in the licence as they have been determined to be adequate to manage this risk event.

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence holder's controls**				
Discharge of waste to landfills	Stormwater runoff / contaminated storm water	**Pathway:** Overland run-off **Impact:** Contamination of surface water/ ecosystem impacts	Native vegetation Surface water lines Fauna habitats	Refer to Section 3.1	C = Slight L = Unlikely **Low Risk**	Y	Condition 15 – Management of waste requirements Condition 16 – Cover Requirements	The applicants' proposed controls have been conditioned in the licence as they have been determined to be adequate to manage this risk event.
Discharge of process / tailings decant water to gravity dam	Process / tailings decant water	**Pathway:** Overtopping of gravity dam **Impact:** Overland runoff of tailings decant water, resulting in impacts to ecological health	Native vegetation Surface water drainage lines Aboriginal heritage sites	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Condition 10 – Containment Infrastructure Requirement	The Applicant has proposed to maintain a freeboard of 500 mm within the gravity dam, this has been conditioned on the licence (condition 10).
		Pathway: Pipeline leaks or rupture **Impact:** Direct discharge to land, resulting in impacts to ecological health	Native vegetation Surface water drainage lines Aboriginal heritage sites	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	Condition 8 – Pipeline Construction Requirements Condition 14 – Inspection of infrastructure	Existing conditions for the management of tailings emissions on the Licence are deemed sufficient by the Delegated Officer (conditions 8 and 14).
Toll treating third party ore Reclaiming and processing historic tailings and vat leach stockpiles	Tailings deposition into Greenfields in-pit TSF	**Pathway:** Pipeline burst or leak causing direct discharge to land **Impact:** Ecosystem disturbance or impact to soil, groundwater or surface water	Native vegetation Surface water drainage lines Aboriginal heritage sites	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Condition 8 – Pipeline Construction Requirements Condition 14 – Inspection of infrastructure	Existing conditions for the management of tailings emissions on the Licence are deemed sufficient by the Delegated Officer (conditions 8 and 14).

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence holder's controls**				
		quality						
		Pathway: Seepage through base of pit **Impact:** Groundwater mounding and adverse impacts to groundwater dependent vegetation	Groundwater Native vegetation	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 10 – 14 (Containment Infrastructure Management Requirements) Condition 34 (Ambient Groundwater Monitoring)	Existing conditions for the management of tailings emissions on the Licence are deemed sufficient by the Delegated Officer (conditions 10 - 14). Metal Cobalt (Co) has been identified as a potential contaminant and therefore added to the suite of parameters required for groundwater monitoring under the existing condition 34 (refer to section 3.3).
		Pathway: Overtopping of pit and stormwater runoff **Impact:** Ecosystem contamination and soil erosion	Native vegetation Surface water drainage lines Aboriginal heritage sites	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 10 – 14 (Containment Infrastructure Management Requirements)	Existing conditions for the management of tailings emissions on the Licence are deemed sufficient by the Delegated Officer (conditions 10 - 14).
Reclaiming and processing historic tailings and vat leach stockpiles	Historic tailings contaminating soils	**Pathway:** Direct discharge to land **Impact:** Contamination of soils and potential bioaccumulation into local food webs	Soil Native vegetation Fauna and flora	Refer to Section 3.1	C = Moderate L = Possible **Medium Risk**	N	**Conditions 30 & 31 (Soil Sampling and Validation Report Requirement)**	Internal advice from the Contaminated Site Branch (CSB) recommended that testing of soil quality is undertaken due to the risk of residual soil contamination from the historic tailings stockpiles (refer to section 3.3). The Delegated Officer has included conditions 30 and 31 to the licence to confirm whether any residual impacts remain that could potentially cause adverse effects on the environment.

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.

3.3 Detailed risk assessment for contaminated soils management

The department sought internal advice from the Contaminated Sites Branch (CSB) in relation to the proposal to reclaim and reprocess potentially contaminated tailings stockpiles within the premises. CSB considers that disposal of the reprocessed tailings material within the Greenfields in-pit TSF will reduce the potential for these materials to cause environmental harm and, therefore, that the proposal is consistent with the requirements of the *Contaminated Sites Act 2003*.

CSB advised that the number and spatial distribution of groundwater monitoring bores across the premises appear appropriate; however, it was recommended that cobalt (Co) be added to the analytical suite of parameters to be monitored. In response, cobalt will be incorporated into the monitoring requirements for the Greenfields in-pit TSF under Condition 34 of the Licence.

Notwithstanding this advice, CSB raised concerns regarding residual soil contamination beneath the historic tailings stockpiles, particularly contamination by a range of metals and metalloids. Of specific concern was mercury, due to its potential for uptake and bioaccumulation in vegetation and subsequent transfer through local food webs. CSB recommended that soil quality testing be undertaken following the removal and transportation of the tailings stockpiles to the Three Mile Hill reprocessing facility. This testing is intended to confirm that residual soil contamination will not pose a risk to wildlife or livestock in the affected areas.

As a result, Conditions 30 and 31 have been included in Licence L8249. These conditions require the licence holder to undertake a soil sampling and data evaluation program (validation program) across the full footprint of the historic tailings stockpiles after all tailings material has been removed. The purpose of the validation program is to assess soil quality and determine whether any residual contamination remains that could cause adverse environmental impacts, including impacts to wildlife and livestock. The validation program must be designed and implemented in accordance with the *National Environment Protection (Assessment of Site Contamination) Measure* (NEPM 1999), and a validation report detailing the investigation outcomes must be submitted to the department.

4. Consultation

Table 9 provides a summary of the consultation undertaken by the department.

Table 9: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website 04 March 2026	No comments received	N/A
Local Government Authority (Shire of Coolgardie) advised of proposal 04 March 2026	The Shire of Coolgardie provided comments on the proposal on 26 March 2026. The Shire advised that the proposal is consistent with relevant local planning policies, the proposal does not impact upon any registered European or Aboriginal Heritage Places and there are no local biodiversity guidelines / plans or environmental impact assessment decisions related to this proposal.	Nearby Aboriginal Heritage Sites have been included as receptors and risk assessed accordingly. The Delegated Officer notes that the Licence Holder is obligated to comply with the requirements of the *Aboriginal Cultural Heritage Act 2021*. Additionally, that road closure and safety is outside of the scope for

Consultation method	Comments received	Department response
	The Shire has no objection to the proposal subject to the following: • The licence holder should ensure that all activities avoid known Aboriginal Heritage Sites and engage with Traditional Owners as required under the *Aboriginal Cultural Heritage Act 2021*. • This approval does not authorise any closure of dedicated or vested roads, in particular Coolgardie North Rd. Closure is subject to separate approval from the Shire of Coolgardie.	approvals under Part V of the EP Act.
Department of Mines, Petroleum and Exploration (DMPE) advised of proposal 04 March 2026	DMPE provided comments on the proposal on 16 March 2026. DMPE advised that the proposed category 5, 6, 12 and 89 throughput increases do not appear to be covered within an approved or submitted Mine Development and Closure Plan (MDCP) and will require a new MDCP submission.	The Delegated Officer notes that the onus rests with the licence holder to ensure compliance with all relevant regulatory bodies.
Marlinyu Ghoorlie Aboriginal Corporation advised of proposal 04 March 2026	No comments received	N/A
Licence holder was provided with draft amendment on 22 April 2026	Comments received from licence holder on 24 April 2026. Refer to Appendix 1.	Refer to Appendix 1.

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 10 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 10: Summary of licence amendments

Condition no.	Proposed amendments
Cover Page	Updated cover page to reflect increased category 5, 6 and 89 throughputs, including category 12 and new mining tenements.
Licence History Table	Included this licence amendment to the licence history table.
Condition 7	Included historic tailings stockpile locations in Table 1.
Condition 10	Inclusion of process / tailings decant water and freeboard requirement to the gravity dam in Table 2.
Condition 15	Inclusion of Special Wastes Type 1 and conveyor rubber to Table 4 – Management of waste requirements.
Condition 16	Inclusion of cover requirements for Special Wastes Type 1 in Table 5.
Condition 18	Addition of Item 5 (Three Mile Hill Plant Upgrade), Item 6 (Dewatering pipelines), Item 7 (Washdown bays etc.) and Item 8 (Three Mile Hill and Dreadnought Landfill) to the construction requirements in Table 6.
Condition 22	Inclusion of condition 22 to the licence, specifying operation requirements for the crushing and screening plants and oily water separators in Table 7.
Condition 24	Inclusion of Big Blow and Empress pits as dewater emission points in Table 8.
Condition 25	Inclusion of Big Blow and Empress pit to Table 9 – Emissions to land – limits. Additionally, the inclusion of a Total Petroleum Hydrocarbon limits for onsite dust suppression.
Condition 26	Inclusion of Big Blow and Empress pit to Table 10 – Emission targets to land.
Condition 29	Inclusion of Big Blow and Empress pit to Table 11 – Monitoring of emissions to land.
Condition 30 & 31	Inclusion of conditions 30 and 31 requiring the licence holder to conduct soil sampling and data evaluation programme across the historic tailings stockpile locations to assess soil quality and submit a validation report detailing the findings of the assessment.
Condition 34	Inclusion of cobalt to the suite of parameters required to be monitored by the Greenfields In-Pit TSF groundwater monitoring bores, specified in Table 14.
-	Update to all condition, table and figure numbers.
Schedule 1	Replaced figures 1, 5, 6, 9 and included figures 11, 16, 17.
Schedule 2	Inclusion of figures 21 and 22.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
4. Focus Operations Pty Ltd (Focus) 2025, *Prescribed Premises L8439/2008/3 – Amendment Support Document*, Perth, Western Australia.
5. Focus Operations Pty Ltd (Focus) 2012, *Preliminary Site Investigation*, Coolgardie, Western Australia.
6. National Environment Protection Council (NEPC) 1999, *National Environment Protection (Assessment of Site Contamination) Measure*, Australia.

Appendix 1: Summary of licence holder's comments on risk assessment and draft conditions

Condition	Summary of licence holder's comment	Department's response
Amendment Report – Section 2.3.2, Table 2	Timeframe for reprocessing each stockpile is subject to DMPE approval. Should approval be granted, the stockpile reprocessing will be scheduled to be undertaken during the life of mine, which extends to 2035.	This comment has been reflected within this amendment report.
Amendment Report – Section 3.1.1, Table 6	Landfill construction has been optimised to use waste rock as a barrier to prevent windblown waste. Consistent covering of the waste has also been proposed, therefore requested to remove 'fencing of landfills' from the proposed controls.	Landfill fencing has been removed from the proposed controls table within this amendment report.
Condition 18, Table 6, Item 6 (b) and (c)	Design and construction requirements incorrectly refer to 'Tailings pipelines' which should be dewatering pipelines.	Condition wording has been amended to dewatering pipelines.
Condition 18, Table 6, Item 8 (b)	Requested amendment of tipping area to 30 m to remain consistent with existing operating conditions within the Licence.	Condition amended to reflect a tipping area of 30 m for the landfills.
Condition 24, Table 8	Licence holder advised that Big Blow and Empress pits can accept dewater from Alicia, Dreadnought and Tindal's Underground Mine.	Alicia, Dreadnought and Tindal's Underground Mine have been added as sources for dewater to the Big Blow and Empress pits.
Condition 25, Table 9 and Condition 29, Table 11	Licence holder requested a change of wording from 'onsite dust suppression' to 'Oily water separator (OWS) reclaim water'.	Change has been accepted.
Condition 31	Licence holder requested the validation report to be submitted within 180 days instead of 90 days to allow for enough time to sample and report in a manner that does not risk non-compliance due to the short time constraint.	Change has been accepted.
Condition 32, Table 12	Bayley's pit is an incorrect description and should reflect 'Bayley's Shaft or underground'.	Condition wording amended to reflect 'Bayley's underground'.

Condition	Summary of licence holder's comment	Department's response
Figure 9 - Dreadnought landfill	The landfill location shown in Figure 9 (Dreadnought landfill) has been rehabilitated in accordance with the waste dump progressive rehabilitation during mining operations. The licence holder has requested to relocate this landfill within the footprint of the approved waste dump.	The Delegated Officer has accepted the new Dreadnought landfill to be included in this amendment. The landfill is to be located within the already approved Alicia/Dreadnought waste dump and does not increase the risk to receptors. This landfill is to accept waste already approved under the existing Licence, with the addition of special wastes type 1.
Figure 16 – Crushing and screening plant locations	Licence holder requested to add Three Mile Hill ROM and CNX Waste dump ROM as approved crushing and screening locations and provided updated figure showing these locations. The licence holder is seeking to add these locations to minimise vehicle movements between suitable waste rock locations so that the material is crushed and screened as close as possible to where it will be used.	The Delegated Officer has accepted the additional crushing and screening locations as they do not increase the risk to receptors. These additional locations are within the approved premises boundary and do not increase the category 12 throughput.