



## Application for Licence Amendment

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

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<b>Licence Number</b>	L8454/2010/2
<b>Licence Holder</b>	Chichester Metals Pty Ltd
<b>ACN</b>	109 264 262
<b>File Number</b>	APP-0031240
<b>Premises</b>	<p>Christmas Creek Mine Site</p> <p>Tenements E46/610, E46/612, M46/320, M46/321, M46/322, M46/323, M46/324, M46/325, M46/326, M46/327, M46/328, M46/329, M46/330, M46/331, M46/332, M46/333, M46/334, M46/335, M46/336, M46/337, M46/338, M46/339, M46/340, M46/341, M46/342, M46/343, M46/344, M46/345, M46/346, M46/347, M46/348, M46/349, M46/350, M46/351, M46/352, M46/353, M46/354, M46/355, M46/403, M46/406, M46/412, M46/413, M46/414, M46/415, M46/416, M46/417, M46/418, M46/419, M46/420, M46/421, M46/422, M46/423, M46/424, G46/7, L46/49, L46/56, L46/58, L46/86, L46/87, L46/106, L46/111, E46/566 and L46/66</p> <p>MULGA DOWNS WA 6751</p> <p>As defined by the coordinates in Schedule 2 of the Revised Licence</p> <p>As defined by the Premises maps attached to the Revised Licence</p>
<b>Date of Report</b>	<b>22 January 2026 (FINAL)</b>
<b>Decision</b>	Revised licence granted

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## 1. Decision summary

Licence L8454/2010/2 is held by Chichester Metals Pty Ltd (Licence Holder) for the Christmas Creek Mine Site (the Premises). 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 L8454/2010/2 has been granted.

## 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 18 September 2025, the Licence Holder submitted an application to the department to amend Licence L8454/2010/2 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Equipping of up to 30 injection bores and 17 km of pipeline corridors within the Proposed Saline Injection Expansion Envelope within the Category 6 limit of 110 GL/annum; and
- Amendments to the existing Schedule 1 Maps (Figure 3, Figure 8, Figure 9, Figure 10, Figure 11, Figure 16 and Figure 18) to include the Gatehouse turkeys nest located on tenement L46/99.

This amendment is limited only to changes to Category 6 activities from the Existing Licence. No changes to the aspects of the existing Licence relating to Category 5, 31, 44, 52, 54, 57, 64, 73 and 77 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**

Category	Current design throughput capacity	Proposed design throughput capacity	Description of proposed amendment
5	77,000,000 tonnes per annual period	No change	N/A
6	43,000,000 tonnes per annual period (reinject)	No change	<p>An expansion of the existing saline transfer and injection system is required to meet forecast increases in saline water abstraction volumes</p> <p>The Licence Holder proposes to expand the saline injection infrastructure by equipping an additional 30 injection bores (SAI201 – SAI231) and up to 17 km of new pipelines, within the Proposed Saline Injection Expansion Envelope to reinject the increased abstraction flows from dewatering operations</p>

Category	Current design throughput capacity	Proposed design throughput capacity	Description of proposed amendment
31	195 tonnes per annual period	No change	N/A
44	5,000 tonnes per annual period (output of 2,500 tonnes of pig iron per annual period)	No change	N/A
52	63.6 MWe per annual period	No change	N/A
54	1,040 cubic metres per day	No change	N/A
57	2,000 tyres	No change	N/A
64	10,000 tonnes per annual period	No change	N/A
73	15,183.10 cubic metres in aggregate	No change	N/A
77	100,000 tonnes per annual period	No change	N/A

As the mine continues to develop and expand, an expansion of the existing saline transfer and injection system is required to meet forecast increases in saline water abstraction volumes. The additional capacity is mostly required in the eastern injection zones where re-circulation of dewatering flows is minimised.

Based on the forecasted increases in saline water volumes from mine dewatering, the Licence Holder proposes to expand the saline injection infrastructure by equipping an additional 30 injection bores (SAI201 – SAI231) and up to 17 km of new pipelines, within the Proposed Saline Injection Expansion Envelope to reinject the increased abstraction flows from dewatering operations.

Rather than providing the indicative locations of the proposed 30 new injection bores and 17 km of new pipeline corridors, which may change as more detailed investigations are undertaken, the Licence Holder has provided an indicative polygon showing the Proposed Saline Injection Expansion Envelope instead.

The Licence Holder notes that the proposed new saline injection bores and pipelines will be located within the Proposed Saline Injection Expansion Envelope, providing additional operational flexibility. This will ensure that the bores and pipelines can be moved and/or shifted within the envelope (based on detailed investigations). These locations will be finalised to ascertain the most suitable location for reinjection of the water back into the aquifer within the limits under the licence and ensure no mounding/drawdown triggers are affected during the expansion of the injection network.

## 2.3 Part IV of the EP Act

The Christmas Creek Iron Ore Mine Expansion was approved on 08 August 2016 by Ministerial Statement (MS) 1033, which authorised the expansion of the existing mining footprint, permanent waste landforms, tailings disposal, conveyors, roads, drainage and other associated mine infrastructure.

The Environmental Protection Authority (EPA) identified in Report No: 1567 the following factors as the key environmental factors during its assessment of the proposal and set the conditions relevant to this assessment:

- **Hydrological Processes / Inland Waters Environmental Quality** – potential impacts from drawdown and mounding of groundwater, potential changes in surface flow regimes and potential changes in water quality;
- **Flora and Vegetation** – direct impacts from the clearing of flora and vegetation and indirect impacts on vegetation from groundwater drawdown and mounding, and changes to surface water flows;
- **Subterranean Fauna** – potential impacts from loss of habitat due to dewatering and excavation of mine pits;
- **Rehabilitation and Decommissioning (Integrating Factor)** – potential long-term impacts to vegetation and fauna habitat if rehabilitation is unsuccessful, and potential long-term impacts to aquifer water quality once dewatering and injection ceases; and
- **Offsets (Integrating Factor)** – to counterbalance the significant residual impacts to native in ‘Good to Excellent’ condition, including habitat for conservation significant fauna species; and vegetation in the proposed Fortescue Marsh Conservation Reserve and Fortescue Marsh management zone 1a.

The Licence Holder advised that potential impacts to conservation significant flora species and fauna species, and vegetation are regulated under MS 1033 including the implementation of several environmental management plans to further mitigate against potential impacts.

## 2.4 Hydrogeological Technical Advice

DWER’s Contaminated Sites Branch (CSB) considers that the current groundwater monitoring network will provide sufficient spatial coverage for the additional saline groundwater injection bores, at least during the term of the current operating licence.

However, CSB is concerned about the potential long-term impacts from continued saline water disposal to ground could have on the position and characteristics of the saline/brackish water interface that bounds the Fortescue Marsh. This interface is likely to be biologically active, and could be an important stygofauna habitat in the region.

The reason for this concern is that modelling investigations that have been undertaken by Stein et al. (2021) have shown that the long-term injection of saline water below a saltwater/freshwater interface can move the position of the interface and can cause the salinisation of an aquifer that contains fresh or brackish groundwater.

As this could lead to the loss of stygofauna habitat that could persist for many decades after mine closure, CSB recommends that the proponent is required to commission an independent review of the results of the monitoring data, and of the groundwater modelling that was carried out to justify the current saline water program for the mine site.

The purpose of such a review would be to assess whether the current saline water injection program is continuing to be environmentally benign, and to determine whether changes need to be made to the program to limit the movement of the saltwater interface that abuts the Fortescue Marsh.

**Key finding: DWER notes that Stygofauna is predominantly regulated under MS 1033 and the Subterranean Fauna Survey Plan. The Licence Holder should consider the above recommendations as part of periodic reviews of any related management plans required under the MS.**

## 2.5 DWER North West Region (NWR) Advice (Water Licensing)

NWR issued the updated groundwater licence to allow abstraction of 110 GL/annum on 06 November 2025. This allows for several usages of the water including groundwater reinjection.

There is the potential for water quality changes due to regional migration of the saline interface, mis-management of reinjection activities impacting brackish aquifers and increase salinity in pit water at cessation of dewatering and impacts to salinity of the surrounding aquifer.

The management framework in the Groundwater Operating Strategy (GWOS) involves the implementation of management zones and setting of triggers with the intention to ensure groundwater conditions remain within acceptable ranges.

While the *Rights in Water and Irrigation Act 1914* (RIWI Act) regulates the take of groundwater, it provides no authority to regulate impacts arising from reinjection. Although mounding triggers are included in the GWOS associated with groundwater license and are useful from a groundwater management perspective, the RIWI Act does not provide the regulatory basis for enforcement of these triggers in the context of injection-related impacts.

Therefore, it is recommended the management framework described in the GWOS which is used to manage the impacts of reinjection activities at Christmas Creek — including those associated with mounding, water quality changes, and pressure build-up — is considered under Part V of the EP Act and regulated via licence L8454/2010/2.

A 26D licence is required for the drilling of reinjection bores. The Licence Holder needs to ensure they hold a valid 26D licence prior to the drilling and construction of new reinjection bores. NWR records show the 26D licence CAW207211(1) expired on 07 April 2024.

Bed and banks permits may be required for any disturbance of bed and banks of creeks where there is a take of water. However, if there is no take (i.e. obstruction or diversion of flows) then the activity is likely exempt from licensing under the RIWI Act. It would be expected that this type of activity and impacts to surface water would be assessed via a Mining Proposal by Department of Mines, Petroleum and Exploration (DMPE).

**Note: On the 27 November 2025, Licence L8454/2010/2 was amended to include conditions that require the Licence Holder to manage reinjection activities to mitigate impacts from groundwater mounding in accordance with the requirements outlined in the approved Christmas Creek GWOS**

**Current licence requirements already include water quality and water level (mounding) monitoring of Zone B, saline reinjection monitoring area.**

## 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 operation which have been considered in this Amendment Report are detailed in Table 2 below. Table 2 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 pathways	Proposed controls
<b>Construction</b>			
Dust	Construction and installation of dewatering infrastructure including injection bores and new pipeline corridors  Movement of vehicles and heavy equipment	Air/wind dispersion	<ul style="list-style-type: none"> <li>Potential dust impacts to vegetation and conservation significant flora are managed by implementing controls detailed in the licence holder's Vegetation Health Monitoring and Management Plan (100-PL-EN-1020), prepared to meet the requirements of MS 1033 conditions 5, 7 and 13.</li> </ul>
<b>Operation</b>			
Saline groundwater (abstracted from dewatering borefields)	Storage of mine dewater in the current HDPE-lined turkeys nests/transfer ponds	Seepage of mine dewater through pond base and walls to underlying soil and groundwater	<ul style="list-style-type: none"> <li>Pond base and walls fitted with a 1.5 mm HDPE liner (turkeys nest/transfer ponds); and</li> <li>Daily visual inspections of the HDPE ponds (liner integrity).</li> </ul>
		Overtopping of mine dewater from ponds	<ul style="list-style-type: none"> <li>Daily visual inspections of the HDPE ponds (freeboard level); and</li> <li>Maintain minimum freeboard of 200 mm.</li> </ul>
	Transport of mine dewater from water source locations approved under the existing RIWI Act licence GWL167593(7)	Mine dewater discharged to environment via pipeline leak/rupture	<ul style="list-style-type: none"> <li>Implementation of existing licence condition 2: All pipelines or sections of pipelines containing tailings or high-risk saline pipelines (as identified on the map of environmentally sensitive areas depicted in Schedule 1) are either: <ul style="list-style-type: none"> <li>➤ equipped with telemetry; or</li> <li>➤ equipped with automatic cut-outs in the event of a pipe failure; or</li> <li>➤ provided with secondary containment sufficient to contain any spill for a period equal to the time between routine inspections.</li> </ul> </li> </ul>
	Injection of mine dewater to	Direct injection of mine dewater via injection	<ul style="list-style-type: none"> <li>Implementation of existing biennial monitoring of dewater quality in</li> </ul>

Emission	Sources	Potential pathways	Proposed controls
	environment (Oakover Formation, the target aquifer for injection) via injection bores	bores  Potential long-term impacts that continuing saline water disposal to ground could have on the position and characteristics of the saline/brackish water interface that bounds the Fortescue Marsh  This interface is likely to be biologically active, and could be an important stygofauna habitat in the region	pipelines discharging to the saline injection borefield (from the Windich transfer pond [CCSP0024] and Crank transfer pond [CCSP0015]) and to the Hillside East Brackish Injection Borefield (CCSP001); and  <ul style="list-style-type: none"> <li>Existing ambient groundwater monitoring in the vicinity of the injection system.</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 and Figure 1 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)). Refer to Figure 1 for Distance to sensitive receptors.

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

Human receptors	Distance from prescribed activity
Townsites and Homesteads	Nullagine is the nearest town, located over 60 km away from the prescribed premises boundary. Roy Hill Station is located 30 km away. Marillana Homestead is located more than 40 km away.  These potential receptors have been screened out from the assessment given the distance is considered sufficient to avoid impacts from emissions and discharges from the premises.
Fortescue Marsh	Fortescue Marsh intersects the premises southern boundary and is about 1 km from the proposed injection bores.  Fortescue Marsh is nationally important and the largest ephemeral wetland in the Pilbara region, a Priority Ecological Community, and is listed on the Directory of Important Wetlands of Australia as a wetland of national significance.
Flora and Vegetation	There is no threatened flora species listed under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act), or Declared Rare Flora (DRF) listed under the Biodiversity Conservation Act 2016 (BC Act) recorded within the premises boundary.  Groundwater sensitive vegetation within or near the premises includes Mulga, Samphire and Coolibah / River Red Gum.

Environmental receptors	Distance from prescribed activity
Livestock bores	Three livestock bores are located within the premises boundary, 22 Mile Bore, Rick's Bore and Gorge Bore. A fourth bore is over 3 km outside of the premises.
Surface water	<p>Numerous surface water lines are present throughout the mine dewater injection area (DWER Geocortex).</p> <p>The premises is located within the Pilbara Surface Water Area proclaimed under the RIWI Act.</p>
Groundwater	<p>Premises is located within the Pilbara Groundwater Area proclaimed under RIWI Act.</p> <p>Groundwater is considered marginal to brackish with a total dissolved solids (TDS) concentration ranging from 500 to 6,000 mg/L within the shallow aquifer zones of the Marra Mamba Formation (MMF). Saline to hypersaline (6,000 – 150,000 mg/L) groundwater is encountered further south within the premises and at greater depth. The aquifer within the Oakover Formation, which overlies the MMF to the south of the resource area, is entirely of saline quality (monitored up to 150,000 mg/L).</p> <p>Groundwater in the project area is generally brackish (&gt;1,000 mg/L TDS) and becomes increasingly saline towards the Fortescue Marsh and with depth (&gt;100,000 mg/L TDS).</p> <p>The Premises sits over three main connected aquifers, the fresh brackish Tertiary Detritals, brackish Marra Mamba Formation and the hypersaline Oakover Formation. The Oakover Formation is approximately 20 m thick and is confined to semi-confined by overlying clays and silts. Current injection at Christmas Creek has confirmed hydraulic disconnection between the Oakover Formation and overlying watertable.</p>
Fauna	Significant fauna identified as potentially occurring within the premises are the Northern Quoll, Night Parrot and Greater Bilby, Pilbara Leaf nosed Bat and Pilbara Olive Python. These receptors have been screened out as the proposed amendment is not expected to alter the risks to fauna species outside that addressed within MS 1033.
Native vegetation	<p>There is native vegetation in the vicinity of the proposed activities. Priority 1 flora (conservation status under the <i>Biodiversity Conservation Act 2016</i>) is mapped within the prescribed premises boundary.</p> <p>Native vegetation identified throughout the proposed new injection bores is pre-European vegetation with sparse low woodland; mulga, discontinuous in scattered groups.</p> <p>Priority 1 flora surveyed: <i>Calotis squamigera</i> and <i>Eremophila spongiocharpa</i>.</p> <p>Priority 4 flora surveyed: <i>Eremophila youngii subsp. lepidota</i>.</p>

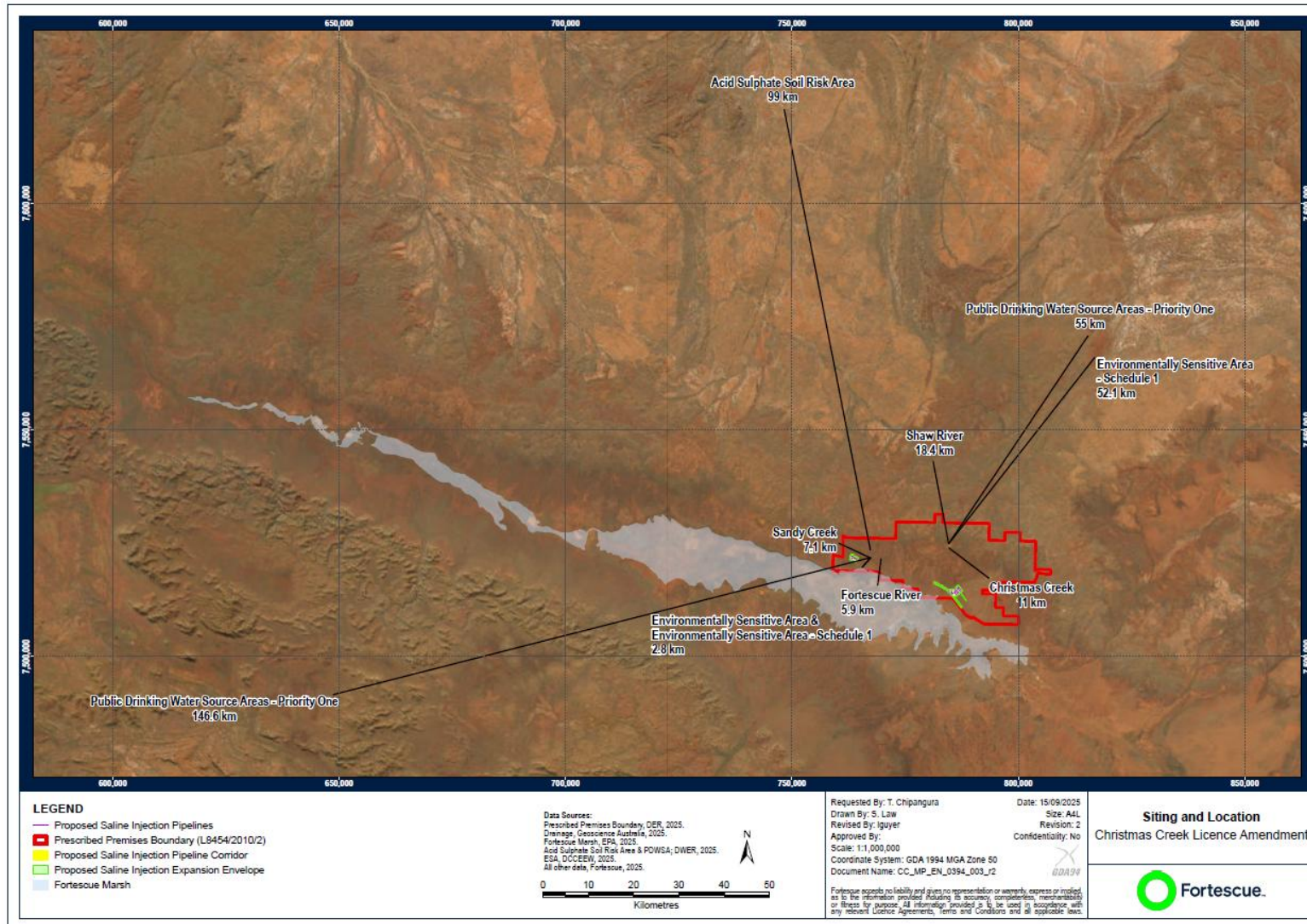


Figure 1: Distance to sensitive receptors

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## 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 L8454/2010/2 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. Category 6 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>								
Movement of mobile equipment (e.g. light vehicles and heavy equipment) constructing and installing dewatering injection bores and new pipeline corridors	Dust	Air/Wind dispersion causing impacts to native vegetation health	Native vegetation	Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	N/A	The Delegated Officer considers potential impacts to vegetation from dust are adequately managed under MS 1033.  General provisions of the EP Act also apply <sup>3</sup> .
<b>Operation</b>								
Transport of mine dewatering water via 17 kms of new pipelines	Saline groundwater (abstracted from dewatering borefields)	Mine dewater discharged to environment via pipeline leak/rupture causing: <ul style="list-style-type: none"> <li>Reduced quality or contamination of groundwater or soil;</li> <li>Soil sodicity, impacted areas may become dispersive, causing increased erosion/sedimentation; and</li> <li>Impacts to native vegetation health.</li> </ul>	Soil Groundwater Native vegetation	Refer to Section 3.1	C = Moderate L = Possible <b>Medium Risk</b>	Y	Condition 3 Pipeline construction infrastructure requirements: Requires pipelines controls Condition 5, Table 4 Inspection of infrastructure: Requires daily visual integrity inspections of pipelines Condition 10, Table 7 Infrastructure requirements: Requires construction requirements including telemetry, automatic cut-outs and secondary containment	Existing conditions on licence are considered sufficient to reduce the environmental risk to an acceptable level.  Condition 10 modified to ensure newly proposed pipelines meet existing requirements for other similar risk profile pipelines.
Storage of mine dewatering water in current turkey nests/transfer ponds	Saline groundwater (abstracted from	Seepage of mine dewater through base and walls of HDPE-lined turkey nests/transfer ponds	Soil Groundwater	Refer to Section 3.1	C = Minor L = Unlikely	Y	Condition 4, Table 3 Containment infrastructure: Requires turkey's nests to be HDPE	N/A.

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Risk Event					Risk rating <sup>1</sup>	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	C = consequence L = likelihood			
	dewatering borefields)	causing: <ul style="list-style-type: none"> <li>Reduced quality or contamination of groundwater or soil;</li> <li>Groundwater mounding; and</li> <li>Impacts to native vegetation health.</li> </ul>	Native vegetation (located within any areas of groundwater mounding)		<b>Medium Risk</b>		lined Condition 10, Table 7 Infrastructure requirements: Requires construction requirements including HDPE liners	
		Overtopping of mine dewater from turkey nests/transfer ponds causing: <ul style="list-style-type: none"> <li>Reduced quality or contamination of soil, sediment, groundwater and/or surface water;</li> <li>Soil sodicity, impacted areas may become dispersive, causing increased erosion/sedimentation; and</li> <li>Impacts to native vegetation health.</li> </ul>	Soil Groundwater Native vegetation	Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	Condition 4, Table 3 Containment infrastructure: Requires operational requirement to maintain 200 mm freeboard Condition 10, Table 7 Infrastructure requirements: Requires construction requirements including freeboard	N/A.
Injection of mine dewatering water to Oakover Formation via 30 new saline re-injection bores (SAI201 – SAI231)	Saline groundwater (abstracted from dewatering borefields)	Saline mine dewater discharged to environment (Oakover Formation, the target aquifer for injection) via injection bores causing: <ul style="list-style-type: none"> <li>Reduced quality or contamination of groundwater and surface water;</li> </ul>	Soil Groundwater Native vegetation (located within any areas of groundwater mounding)	Refer to Section 3.1	C = Moderate L = Possible <b>Moderate Risk</b>	Y	Condition 16, Table 10 Point source emission to groundwater Condition 23, Table 14 Monitoring of point source emissions to groundwater: Requires quality monitoring of reinjections water	Existing conditions on licence are considered sufficient to reduce the environmental risk to an acceptable level. Condition 16 updated to include the equipping of 30

Risk Event					Risk rating <sup>1</sup>	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	C = consequence L = likelihood			
		<ul style="list-style-type: none"> <li>Groundwater mounding from pressurization of the deep Oakover aquifer resulting in vertical migration through the confining clay layer into the overlying shallow aquifer; and</li> <li>Impacts to native vegetation health.</li> </ul>	including impacting Mulga and associated Acacia species or samphire vegetation  Fortescue Marsh				Condition 26, Table 17 Monitoring of ambient groundwater quality: Requires ambient groundwater SWL and quality monitoring  Conditions 27 – 31 requires management of groundwater mounding  Condition 32, Table 18 Expansion of ambient groundwater monitoring network requirements: Requires expansion of ambient groundwater monitoring network	new injection bores.
		Potential long-term impacts that continuing saline water disposal to ground could have on the position and characteristics of the saline/brackish water interface that bounds the Fortescue Marsh.	This interface is likely to be biologically active, and could be an important stygofauna habitat in the region	Refer to Section 3.1	C = Moderate L = Possible <b>Moderate Risk</b>	Y	N/A	Refer to Section 2.4  The Delegated Officer considers potential impacts to stygofauna are adequately managed under MS 1033:  Subterranean Fauna Survey Plan.

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.

Note 3: General offences relating to pollution or unreasonable emissions (section 49), environmental harm (sections 50A, 50B and 50C), and notification of certain discharges of waste (section 72 of the EP Act).

## 4. Consultation

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

**Table 5: Consultation**

Consultation method	Comments received	Department response
Local Government Authority advised of proposal on 27 November 2025	No comments received.	N/A.
Department of Mines, Petroleum and Exploration (DMPE) advised of proposal on 27 November 2025	No comments received.	N/A.
Karlka Nyiyaparli Aboriginal Corporation RNTBC advised of Proposal on 27 November 2025	No comments received.	N/A.
Licence Holder was provided with draft amendment on 07 January 2026	The Licence Holder responded on 20 January 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 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
10, Table 7	Installation of 30 saline injection bores drilled into the Oakover aquifer: SAI201 – SAI231, added to Design and construction infrastructure requirements. Requirements for new pipelines (in-line with existing conditions)
16, Table 10	SAI201 – SAI231 (equipping of 30 new injection bores), added to Point source emissions to groundwater.
Schedule 1: Maps, Figure 3	Updated the map in Figure 3 of the Licence as the Licence Holder notes that the existing map in the Licence lacks clarity due to the highlighted red bold text. Therefore, the Licence Holder has updated the map and legend to make it clearer.

Condition no.	Proposed amendments
Schedule 1: Maps, Figure 8	<p>During the amendment to the Licence approved in September 2023, the prescribed premises boundary was revised to include the Gatehouse turkeys nest, which was located outside of the Licence boundary within mining tenement L46/99.</p> <p>The Licence Holder has updated the map in Figure 8 of the Licence to show:</p> <ul style="list-style-type: none"> <li>• The revised prescribed premises boundary; and</li> <li>• Proposed Saline Injection Expansion Envelope is where the proposed saline injection bores and pipelines are to be located.</li> </ul>
Schedule 1: Maps, Figure 9	The Licence Holder has updated the map in Figure 9 of the Licence to clearly show the Licence prescribed premises boundary, and to make the legend more legible.
Schedule 1: Maps, Figure 10	The Licence Holder has updated the map in Figure 10 of the Licence to clearly show the Licence prescribed premises boundary, and to make the legend more legible.
Schedule 1: Maps, Figure 11	The Licence Holder has updated the map in Figure 11 of the Licence to clearly show the Licence prescribed premises boundary and make the legend more legible.
Schedule 1: Maps, Figure 16	<p>During the amendment to the Licence approved in September 2023, the prescribed premises boundary was revised to include the Gatehouse turkeys nest, which was located outside of the Licence boundary within mining tenement L46/99.</p> <p>The Licence Holder has updated the map in Figure 16 of the Licence to show:</p> <ul style="list-style-type: none"> <li>• The revised prescribed premises boundary; and</li> <li>• Proposed Saline Injection Expansion Envelope is where the proposed saline injection bores and pipelines are to be located.</li> </ul>
Schedule 1: Maps, Figure 18	The Licence Holder has updated the map in Figure 18 of the Licence. During the amendment to the Licence dated 2023, the prescribed premises boundary was updated to include the prescribed infrastructure (Gatehouse turkeys nest), which was located outside of the Licence boundary within mining tenement L46/99.

## 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. Chichester Metals Pty Ltd, Fortescue Ltd submission of the amendment to the Christmas Creek Mine Site Licence L8454/2010/2 - APP-0031240 18 September 2025 (APP-0031240 – Application and Supporting Documentation).
5. Stein, S., Michael, H.A. and Dugan, B., 2021. Injection of desalination brine into the saline part of the coastal aquifer; environmental and hydrological implications. *Water Research*, 207, 117820.

## 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 16	<p>The Licence Holder has requested additional wording to ensure that the proposed saline expansion envelopes are included in the text –</p> <p>The licence holder must ensure that where waste is emitted to groundwater from the emission points in Table 10 and identified on the map of emission points <b>or the maps of saline expansion envelopes</b> in Schedule 1, it is done so in accordance with the conditions of this licence.</p>	<p>The department has changed the condition to read –</p> <p>The licence holder must ensure that where waste is emitted to groundwater from the emission points in Table 10 and identified on the map of emission points or maps of saline injection expansion envelopes in Schedule 1, it is done so in accordance with the conditions of this licence.</p>
Condition 39, Table 20 for Condition 10, Table 7	<p>The Licence Holder requests that the notification requirement be updated to provide the flexibility previously sought to submit quarterly reports by the last day of the following month:</p> <p>The Licence Holder proposes the following wording -</p> <p><del>Prior to commencement of commissioning,</del>  <b>S</b>ubmitted quarterly, <b>by the last day of the following month in each year:</b></p> <ul style="list-style-type: none"> <li>• April (for January to March)</li> <li>• July (for April to June)</li> <li>• October (for July to September); and</li> <li>• January (for October to December) in any year.</li> </ul>	<p>The department has changed the notification requirement to read “Submitted quarterly, by the last day of the following month”.</p> <p>Noting that the definition for ‘quarterly’ is already defined in the existing Licence.</p> <p>The changes made to the notification requirement, requires condition 11 to be updated to allow operation of the infrastructure prior to the submission of the compliance document. The department has updated condition 11 to read –</p> <p>The Licence Holder must operate the infrastructure <b>listed specified</b> in <del>Table 7 of condition 10</del> in accordance with the conditions of this licence, <b>once the design and construction requirements specified in condition 10 have been met<sup>1</sup>. following submission of the compliance documents required under condition 39.</b></p> <p><b>Note 1: corresponding compliance reporting requirements are specified in condition 39.</b></p>