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	L8675/2012/1
Licence Holder	Millennium Minerals Pty Ltd
ACN	003 257 556
File Number	APP-0031951
Premises	Nullagine Gold Project Mining Tenements M46/3, M46/47, M46/50, M46/57, M46/98, M46/129, M46/138, M46/146, M46/163, M46/164, M46/166, M46/167, M46/170, M46/182, M46/186, M46/192, M46/198, M46/199, M46/200, M46/225, M46/261, M46/262, M46/264, M46/265, M46/266, M46/267, M46/272, M46/273, M46/275, M46/276, M46/277, M46/278, M46/300, M46/432, M46/433, M46/434, M46/436, M46/442, M46/443, M46/444, M46/445, M46/545, G46/2, L46/33, L46/45, L46/88, L46/91, L46/98, L46/105, L46/115, P46/1755 and P46/1756 NULLAGINE WA 6758 As defined by the Premises map attached to the Revised Licence
Date of Report	07/05/2026 (FINAL)
Proposed Decision	Intent to grant revised licence

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1. Decision summary

Licence L8675/2012/1 is held by Millennium Minerals Pty Ltd (Licence Holder) for the Nullagine Gold Project (the Premises), located approximately 8 km south-east of Nullagine in the Pilbara region of Western Australia.

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 operation of the Premises. As a result of this assessment, Revised Licence L8675/2012/1 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 Amendment summary

The Licence Holder is a subsidiary of AIM Mining Corporation Limited (AIM). The Premises is 100% owned and operated by AIM, following acquisition of Millennium Minerals Ltd and previous owner Calidus Resources in 2025.

On 17 October 2025, the Licence Holder submitted an application to the department to amend Licence L8675/2012/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

The following amendments are being sought (AIM 2025):

- Upgrade to the existing Golden Eagle processing plant to incorporate a refractory circuit for processing sulphidic ore; and
- Include associated infrastructure - a Flotation Water Dam (Turkey's Nest) and Concentrate storage area.

To progress validation of the application the department sent a request for further information to the Licence Holder on 26 November 2025. A response was received from the Licence Holder on 18 December 2025.

From the response the department noted the following:

- The sulphide circuit will initially run separately with ore being sourced from the existing Nullagine orebodies.
- Where new mining areas are identified in the future (and subject to further approvals), the antimony circuit will feed the sulphide circuit.
- Tailings from both circuits of the flotation plant will re-enter the existing processing plant and report to the existing Tailings Storage Facility (TSF) 2 as a mixed stream.
- New reagents are being added to the process, which will change the characterisation of the tailing stream previously assessed.
- The geochemical assessment of the tailings is currently underway.

The department responded to the Licence Holder on 08 January 2026 advising that the characterisation of the tailings forms an integral part of the assessment and this information needs to be provided prior to the department validating / accepting the application.

On 16 January 2026 a meeting was held with between AIM and the department. A staged

approach was determined for the refractory circuit separating the approvals process into two components:

- Stage one to allow the construction of a refractory circuit while the assessment of the tailings stream was undertaken; and
- Stage two for commissioning and operations (i.e. deposition of the new tailings stream into TSF2).

On 29 January 2026 the supporting document for the amendment application was resubmitted (AIM 2026b).

The revised scope of this Amendment Report is for stage one; to seek approval for the construction of a refractory circuit for the processing of sulphidic ores and Antimony extraction, whilst continuing with the tailings geochemical assessment.

The Licence Holder will be required to submit a new and separate licence amendment application and have this assessed for the deposition of tailings as a mixed stream (CIL plant; and refractory circuit) to the existing TSF2 once the geochemical assessment of the tailings has been completed.

AIM understands that under stage one (initial license amendment) no new ore sources or tailings streams can be processed and accept the commercial risks associated with undertaking the construction works if a second amendment to allow commissioning and operations is nor forthcoming (AIM 2026a).

On 16 February 2026, the Licence Holder requested an addendum to the current licence amendment application (for the construction of the refractory circuit) to include an increase in the design capacity for Category 89 to accommodate operational requirements (AIM 2026c).

This amendment is therefore limited only to changes to Category 5 and 64 (previously 89) activities from the existing Licence. No changes to the aspects of the existing Licence relating to Category 7, 12, 52, 73, 77 and 85 have been requested by the Licence Holder. Table 1 below outlines the existing and proposed changes to the existing Licence.

Table 1: Existing and proposed design capacity changes

Category	Current design capacity	Proposed design capacity	Description of proposed amendment
5	2,000,000 tonnes per annual period	No change	N/A – no change with the upgrade to the existing processing plant
7	2,000,000 tonnes per annual period	No change	N/A
12	700,000 tonnes per annual period	No change	N/A
52	10 MW	No change	N/A
64	-	3,000 tonnes per annual period	Inclusion of the 500 tonnes per annual period previously approved under Category 89 and the 2,500 tonnes per annual period requested under this amendment
73	1,747.8 m^3 in	No change	N/A

Category	Current design capacity	Proposed design capacity	Description of proposed amendment
	aggregate		
77	6,000 tonnes per annual period	No change	N/A
85	80 m^3/day	No change	N/A
89	500 tonnes per annual period	0 tonnes per annual period	With the increase in design capacity requested. Category 89 has been changed to Category 64

2.2.1 Golden Eagle processing plant

Background

The Golden Eagle processing plant is the central ore processing area for the Premises and consists of a conventional Carbon-In-Leach (CIL) mill. The processing of ore includes:

- Single stage crushing
- Ore storage and reclaim
- Grinding and reclassification
- Gravity concentration
- Leaching and absorption (CIL)
- Tailings disposal
- Reagent mixing, storage and distribution
- Powerhouse
- Water and air services.

Processing plant upgrades

The Licence Holder is proposing to upgrade the existing processing plant with the construction of a flotation plant and associated infrastructure for effective processing of ore that would otherwise result in low gold recovery through the existing CIL plant.

Some geological domains of fresh ore from the Premises are not amenable to conventional CIL processing, as the gold particles are locked within the sulphide matrix, and thus subsequent oxidative treatment is required to release the gold for leaching. Such oxidative processes chemically or thermally destroy the sulphide particle matrix, thus allowing direct access of cyanide solution to the entrained gold particles, resulting in dissolution or leaching of the gold.

Additional to sulphide locked gold ores are regional geological domains associated with Stibnite (a sulphide mineral and the primary industrial ore of Antimony) which are associated with gold ore loads at some deposits.

A two-part flotation circuit will be constructed to first extract a Stibnite (Antimony) concentrate prior to flowing down to the second stage of the flotation circuit to extract a sulphide concentrate as shown in Figure 1.

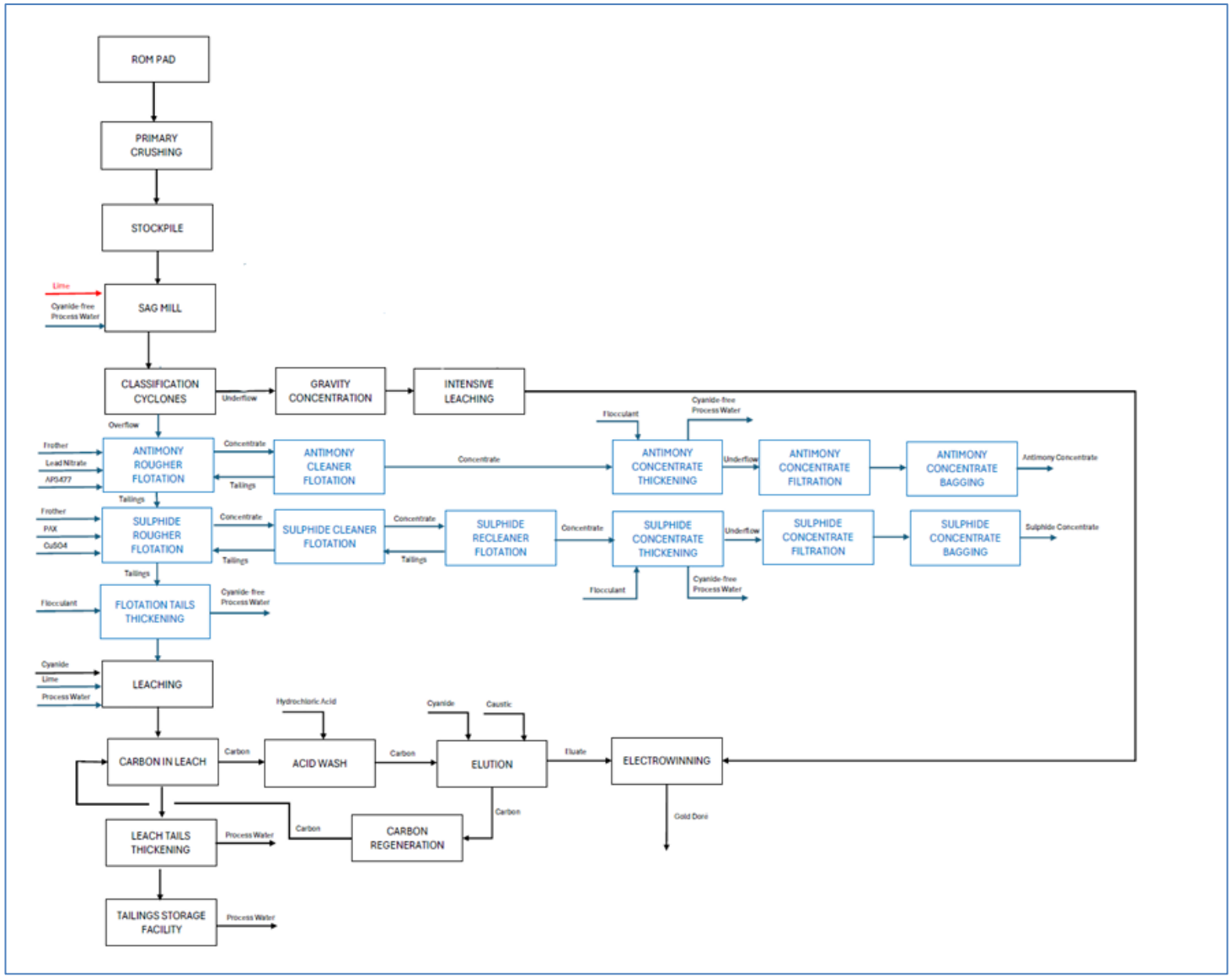

Figure 1: Process Flow Diagram (elements in blue are proposed)

Flotation:

Ore from the Premises mining areas will be transported to the Golden Eagle Run of Mine pad, passed through a primary crusher and then milled in a single stage Semi-Autogenous Grinding (SAG) mill closed with hydro-cyclones to achieve a product size of 80% passing 75 micro metres. The mill cyclone overflow is then directed to a conditioning tank for controlled dosing with collector. The conditioned stream is transferred to the flotation circuit where frother and low-pressure air are introduced to the flotation cells. A flotation concentrate of 8% weight (of feed) is produced. This concentrate is expected to contain ~91% of the flotation feed sulphide and gold contents.

The Stibnite (or Antimony) flotation circuit will be constructed in front of the Sulphide circuit to enable the diversion of any Antimony rich ores through the Stibnite flotation circuit prior to running through the Sulphide component. This will allow the extraction of a Stibnite (or Antimony) concentrate using slightly different reagents than the Sulphide circuit.

The Stibnite circuit will utilise the following reagents for the rougher, cleaner and collector process:

- Frother,
- Lead Nitrate
- Specialised Organic Chemical (AP4377).

Whilst the Sulphide circuit will utilise the following reagents for its process:

- Frother
- Potassium Amyl Xanthate (PAX)
- Copper Sulphate.

The Stibnite flotation circuit starts with the slurry flowing through a rougher circuit comprised of up to five 19 m^3 steel tank cells arranged in series. The tanks are open topped and designed for product to overflow out of top into a launder. The bulk of the slurry gravity feeds to the next tank which sits physically lower than the proceeding tank.

The rougher concentrate is then transferred to the cleaner flotation circuit where additional collector and frother are added. This cleaner concentrate is ~70% weight (of rougher concentrate) produced, equivalent to approximately 5 tonnes (t) per hour (t/h). This concentrate is expected to contain ~98% of the cleaner flotation feed sulphide and gold contents. Cleaner flotation tailings are cycled back to the Sulphide circuit rougher flotation feed.

The Sulphide rougher flotation circuit shall be comprised of up to seven 100 m^3 steel tank cells arranged in series. The tanks are open topped and designed for product to overflow out of top into a launder. The bulk of the slurry gravity feeds to the next tank which sits physically lower than the proceeding tank.

The rougher concentrate is then transferred to the cleaner flotation circuit where additional collector and frother are added. This cleaner concentrate is further upgraded in a recleaner flotation cell. A recleaner flotation concentrate of ~70% weight (of rougher concentrate) is produced, equivalent to approximately 5 t/h. This concentrate is expected to contain ~98% of the cleaner flotation feed sulphide and gold contents.

Cleaner flotation tailings are recycled back to the rougher flotation feed (or optionally directed to the CIL plant and ultimately the final tailings).

Noting the direction to the CIL plant and final tailings is not authorised under this Amendment Report.

Concentrate Dewatering and Handling:

The final concentrate is dewatered via a high rate thickener where the concentrate thickener overflow stream is returned to the process water system within the process plant and the underflow stream is filtered. Flocculant is added to the concentrate thickener feed stream to assist with settling. The filtration circuit is nominated to operate on a continuous basis corresponding to a circuit throughput rate of approximately 5 t/h. The filter is a plate and frame style with 1.25 m x 1.25 m plates (or similar), this type of filter has been selected as these filters typically achieve the lowest moisture content in filter cake.

Filtrate reports to the process water system and the concentrate filter cake will discharge into a hopper, from which it will be withdrawn by screw feeder to a vendor-supplied bagging system which will direct the concentrate into bulk bags.

Gold and Antimony Concentrates – Packaging, Storage and Transport:

The concentrate product is packaged in moisture resistant bulk bags and stored in a concentrate shed.

Concentrate bulk bags, will be loaded whilst in the bagging shed into custom sea containers. Sea containers will ultimately be stored on hardstand awaiting transport via truck to the port for export.

Typical chemical and reagent quantities are shown in Table 2.

Table 2: Reagent storage amounts

Reagent	Storage
Frother	3 x 1 m^3 IBC
PAX – Potassium Amyl Xanthate	3 x 1.25 t bags
Lead Nitrate	9 x 1.25 t bags
AP3477 – AERO 3477 PROMOTER	2 x 1.0 t bags
Copper Sulphate	5 x 1.25 t bags
Flocculant	60 x 25 kg bags
Carbon	2 x 1 t bags
Steel Balls	60 t
Lime	150 t silo
Cyanide	128 m^3
Sodium Hydroxide	40 m^3
Hydrochloric Acid	48 m^3

Flotation Water Dam

The Flotation Water Dam will contain water from the flotation thickener underflow of the Stibnite and Sulphide circuits.

To note there is already an existing Process Water Dam at the Premises for the CIL plant. The Flotation Water Dam differs from the CIL Process Water Dam in that the flotation thickener

underflow is prior to any cyanide addition.

Tailings

The tailings from both circuits of the flotation plant will re-enter the existing CIL process plant for any additional cyanide gold recovery and report to the existing tailings flow. Further investigation and studies are underway to characterise the revised tailings stream in terms of geochemical composition.

This amendment to existing Licence L8675/2012/1 does not authorise the deposition of tailings from the refractory circuit to the existing TSF2.

Refer to section 3 for the risk assessment to include the refractory circuit and associated infrastructure.

2.2.2 Increase in waste disposal volumes

The Premises went into care and maintenance in 2022. The department was advised on 23 September 2025 that the Golden Eagle processing plant is currently undergoing refurbishment works in preparation for a planned restart of operations.

As a result of mining restart the Licence Holder is requesting an increase to the total waste throughput from 500 tonnes per annual period to 3,000 tonnes per annual period.

The Licence Holder has advised (AIM 2026c) that there will be no changes to the waste types being accepted in to the landfill with only Inert Waste Type 1, Putrescible Waste and Clean Fill being accepted as per Condition 3 of the existing Licence (previously Condition 10). Additionally, the Licence Holder is not seeking an increase to the current approved landfill footprint, which is confined to the Golden Eagle Waste Rock Dump (WRD).

Refer to section 3 for the risk assessment for the increase in waste disposal volumes.

The department has updated the prescribed premises category description on the Licence from Category 89 to Category 64 under this amendment.

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 3 below. Table 3 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

While the operation of the refractory circuit and associated infrastructure have been assessed below. The department does not authorise the deposition of tailings associated with these circuits into the existing TSF2.

Table 3: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Mechanical clearing / land disturbance Upgrades to existing processing plant to include flotation circuit, flotation water dam and concentrate storage area	Air / windborne	• Use of existing disturbance areas where possible to minimise new clearing. • Use of water cart to control dust if required. • Clearing not undertaken during high winds.
Noise		Noise and vibration	**No receptors in the vicinity– emission screened out.**
Hydrocarbon spills	Vehicle / machinery	Discharges to land	All spills immediately cleaned up in accordance with procedures.
Operation			
Refractory circuit and associated infrastructure			
Processing slurry	Operation of the 2-part flotation circuit	Discharges to land from tank / bund overflows	• Flotation circuit tank area subject to slurry spills constructed on concrete slabs and bunds capable of containing 110% of the capacity of the largest tank within the bunded area. • Bunded areas equipped with sump pumps to recover any spilled material or rain falling on the slabs for reclaim to the process.
Contaminated water	Flotation Water Dam	Discharges to land from overtopping of the Flotation Water Dam	• Constructed with a welded high density polyethylene (HDPE) liner. • Designed to have a nominal capacity of 6.4 million litres of water suitable for reticulation of the circuit. • Contain water from the flotation thickener underflow of the Sulphide and Stibnite circuits (no cyanide addition). • Pipelines constructed of HDPE and located within bunded trenches where there is a risk of discharge to the surrounding environment. • A minimum top of embankment freeboard of 300 mm to be maintained.

Emission	Sources	Potential pathways	Proposed controls
Chemicals and reagent spills	Chemical / reagent storage area	Discharges to land from leaks, spills and ruptures	• Chemicals stored in bulk tanks or intermediate bulk containers. • Reagents associated with the flotation circuits stored in a secure shed.
Sediment laden and/or potentially contaminated stormwater	Rainfall events in the vicinity of the process area	Stormwater that has the potential to flow through the process area and become contaminated	• Rainfall run-off from non-bunded areas within the main plant area to be collected in a run-off collection dam (event pond) from which it will be reclaimed by portable pump. • Run-off from areas not subject to possible contamination to be diverted around the plant area to rejoin natural watercourses as per existing infrastructure.
Concentrate spills / bag ruptures	Handling and storage of concentrate	Discharges to land	• Concentrate product be packaged in moisture resistant bulk bags. • Concentrate stored within a shed which is fully enclosed and has a concrete floor which is bunded. • Sump pumps utilised to return any run-off material back into the process circuit. • Concentrate bulk bags to be loaded in the bagging shed into custom sea containers. • Sea containers to be moved to a handstand area using a specialised sea container lift to avoid piercing the containers and bags.
Golden Eagle WRD			
Dust	Increase in waste disposal volumes	Air / windborne	• Use of water cart to control dust if required. • Cell construction and covering activities not to be undertaken during high winds.
Windblown waste		Air / windborne	• Cells to be fully fenced and the gate closed when active tipping is not in progress. • Waste to be covered weekly or as

Emission	Sources	Potential pathways	Proposed controls
			soon as practicable after deposit and prior to compaction.
Seepage / leachate		Infiltration through underlying soils	• Cells to be a maximum of 5 m deep. • Cells to be constructed on the Golden Eagle WRD. • No cells to be excavated below ground level. • The base of all cells not to go within 2 m of the local groundwater level.

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 4 below provides a summary of potential human, environmental and cultural 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 4: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Five Mile Aboriginal Community *AIM 2026b* states "seasonally occupied".	Approximately 8 km north-east of the existing processing plant.
Environmental receptors	**Distance from prescribed activity**
<u>Priority Ecological Community (PEC)</u> Stony saline clay plains of the Mosquito Land System (Priority 3). *AIM 2026b* states *The clearing required for the amendment area will not have a significant impact on the PEC. The combined clearing equates to 3 ha of the Stony Saline Plains PEC, which covers an area of 46,000 ha (Woodgis 2023a).*	Overlays the prescribed premises boundary.
<u>Threatened and/or Priority Flora</u> Thirteen Priority (P) flora species have been recorded in the Mosquito Land System of which four species have been recorded in the Project area. These are *Acacia fecunda* (P1), *Acacia aphanoclada* (P1), *Eucalyptus rowleyi* (P3) and *Solanum sp. Mosquito Creek* (P1). These taxa are abundant local endemics (i.e. *Acacia fecunda*) and/or are disturbance opportunistic (i.e. mass germinations occur in response to fire or soil disturbance (i.e. *Solanum* sp. Mosquito Creek) (AIM 2026b).	Potentially within prescribed premises boundary.

Public Drinking Water Source Area Nullagine Water Reserve (Priority 1)	Approximately 3.5 km north-west of the existing processing plant. Approximately 4 km north-west of the Golden Eagle WRD.
Surface Water Cajuput Creek Surface water in the catchment is seasonal and is primarily a response to cyclonic and monsoonal rainfall events.	Approximately 2.25 km west of existing processing plant. Approximately 1.4 km west of the Golden Eagle WRD.
Groundwater	Groundwater depths between 20 to 25 m below ground level. The bottom of the landfill cells will sit at a minimum 10 m above natural ground level with a further 11 to 35 m depth to groundwater.
Rights in Water and Irrigation Act 1914 Pilbara Proclaimed Groundwater Area and Surface Water Area	Overlays the prescribed premises boundary.
Cultural receptors	**Distance from prescribed activity**
Aboriginal heritage site ID 704 MINTURNA, Creation / Dreaming Narrative	Approximately 500 m north-east and 500 m south-east of the existing processing plant. Approximately 500 east of the Golden Eagle WRD.

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 5.

The Revised Licence L8675/2012/1 that accompanies this Amendment Report authorises emissions associated with the upgrades to the existing Golden Eagle processing plant to incorporate a refractory circuit at the Premises.

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

Table 5. 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								
Mechanical clearing / land disturbance Upgrades to existing processing plant to include flotation circuit, flotation water dam and concentrate storage area	Dust	Air / windborne pathway causing impacts to amenity and potential smothering of vegetation impacting photosynthesis	PEC Priority Flora	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	N/A	General provisions of the EP Act apply
Vehicle / machinery	Hydrocarbon spills	Discharges to land causing soil contamination and vegetation death depending on the size of the spill	PEC Priority Flora Soil Vegetation	Refer to Section 3.1	C = Moderate L = Possible **Medium Risk**	Y	N/A	*Environmental Protection (Unauthorised Discharges) Regulations 2004* applies as does the general provisions of the EP Act
Operation								
Refractory circuit and associated infrastructure								
Operation of the 2-part flotation circuit	Processing slurry	Discharges to land from tank overflows potentially breaching containment bunds resulting in impacts to soil and vegetation in the vicinity of the overflow	PEC Soil Vegetation	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Licence Holder's controls imposed on the Licence through the following conditions: • Condition 7 – Construction requirements • Condition 11 – Operational requirements **Condition 8** also included	Condition 8 has been included to allow the operation of the infrastructure following the submission of compliance documentation, with the exception of the flotation circuit The deposition of the flotation circuit tailings stream to TSF2 is not

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**				
								authorised under this Amendment Report
Flotation Water Dam	Contaminated water	Discharges to land from overtopping of the Flotation Water Dam and / or leaks / ruptures of pipelines to the Flotation Water Dam causing contamination of soil and vegetation in the vicinity of the overflow / spill	PEC Soil Vegetation	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	Licence Holder's controls imposed on the Licence through the following conditions: • Condition 7 – Construction requirements • Condition 10 – Containment infrastructure	N/A
Chemical / reagent storage area	Chemical and reagent spills	Discharges to land if leaks, spills and ruptures of chemicals and reagents breach the containment area resulting in impacts to soil and vegetation	PEC Soil Vegetation	Refer to Section 3.1	C =Minor L = Possible **Medium Risk**	Y	N/A	*Environmental Protection (Unauthorised Discharges) Regulations 2004* applies as does the general provisions of the EP Act
Rainfall events in the vicinity of the process area	Sediment laden and / or potentially contaminated stormwater	Stormwater that has the potential to flow through the process area and become contaminated resulting in sedimentation of surface water drainage	Cajuput Creek Surrounding vegetation	Refer to Section 3.1	C = Minor L = Possible **Medium Risk**	Y	Licence Holder's controls imposed on the Licence through the following conditions: • Condition 7 – Construction requirements • Condition 11 – Operational requirements	N/A
Handling and storage of	Concentrate spills	Discharges to land from concentrate	Surrounding	Refer to	C = Minor	Y	Licence Holder's controls imposed on the Licence	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**				
concentrate	/ bag ruptures	spills potentially impacting the surrounding vegetation	vegetation	Section 3.1	L = Unlikely **Medium Risk**		through Condition 11 – Operational requirements	
Golden Eagle WRD								
Increase in waste disposal volumes	Dust	Air / windborne pathway potentially smothering vegetation impacting photosynthesis	PEC	Refer to Section 3.1	C = Slight L = Possible **Low Risk**	Y	N/A	The general provisions of the EP Act apply
	Windblown waste	Air / windborne pathway potentially attracting feral fauna	Feral fauna	Refer to Section 3.1	C = Slight L = Possible **Medium Risk**	Y	Condition 6 on the existing Licence has cover requirements	N/A
	Seepage / leachate	Infiltration through underlying soils resulting in reduced soil quality impacting health of surrounding vegetation	Soil Vegetation PEC	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions on existing Licence relating to: • Condition 3 – Waste acceptance • Condition 5 – Waste processing including distance from base of landfill and the highest groundwater level	N/A

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

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

4. Consultation

Table 6 provides a summary of the consultation undertaken by the department.

Table 6: Consultation

Consultation method	Comments received	Department response
Local Government Authority (Shire of East Pilbara) advised of proposal on 17 February 2026	No comments received	N/A
Department of Mines, Petroleum and Exploration (DMPE) advised of proposal on 17 February 2026	DMPE responded on 19 February 2026 stating that the Nullagine Gold Project Mining Development and Closure Proposal (MDCP) (Reg ID 205956) was assessed under the *Mining Act 1978*. The MDCP was approved (Approval Statement AS-225448) on 13 February 2026	Noted
Palyku-Jartayi Aboriginal Corporation RNTBC advised of proposal on 17 February 2026	No comments received	N/A
Licence Holder was provided with the draft amendment on 17 March 2026	The Licence Holder provided comments on 14 April 2026 (AIM 2026d) Refer to Appendix 1	Refer to Appendix 1
Licence Holder was provided with a 2nd draft amendment on 24 April 2026	The Licence Holder provided comment on 4 May, requesting the amended licence to be granted.	N/A

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 7 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.

Note: Refer to Appendix 1 for additional updates to the Licence following the initial proposed draft Licence being provided to the Licence Holder on 17 March 2026.

Table 7: Summary of licence amendments

Condition no.	Proposed amendments
Registered business address	Updated as per Application Form.
DWER file number	Updated to include Environment Online reference.
Duration	Extended for an additional 10 years, from 29/09/2026 to 29/09/2036.
Premises details	Inclusion of M46/545, P46/1934 and P46/2027 and removal of P46/1824.
All	Table numbers updated in line with updated condition numbering. Administrative updates. Conditions updated to specify correct Figures.
Prescribed premises category description	Inclusion of Category 64 for 3,000 tonnes per annual period, to replace Category 89 of 500 tonnes per annual period. Refer to Table 1 and section 2.2.2.
Condition 2	
Condition 3 (previous Condition 10)	Quantity limit for Inert Waste Type 1, Putrescible Waste and Clean Fill updated from 100 tonnes per year in total to 2,600 tonnes per year in total.
Condition 7 (previous Condition 3)	Inclusion of construction requirements for the Flotation circuit and Process Water Dam.
New Condition 8	Inclusion of Condition 8 to allow the Licence Holder to operate the infrastructure (with the exception of the flotation circuit) associated with Condition 7 once compliance documentation is submitted.
Previous Condition 6	Deleted. The Licence Holder submitted a Bore Installation and Testing Report to the department on 1 February 2026 for the groundwater monitoring bores TSF2MB9S/D, TSF2MB10S/D, TSF2MB11S/D, TSF2MB12S/D, TSF2MB13S/D, TSF2MB14S/D and TSF2MB15 (APP-0033533) satisfying this condition.
Condition 10 (previous Condition 9)	Removal of reference to ‘tailings, decant water and treated effluent’ and inclusion of the term ‘materials’ as described in the table to cover other containment infrastructure as applicable. Inclusion of Figure numbers associated with the infrastructure. Inclusion of the Process Water Dam and requirements.
Condition 11 (previous Condition 14)	Inclusion of operational requirements for the Flotation circuit and Concentrate handling and storage.
Condition 19 (previous	Monitoring points updated to align with the Figures.

Condition no.	Proposed amendments
Condition 22)	Inclusion of Figure number associated with the monitoring locations. Removal on Note 3 as these bores have now been installed. Refer to comment for previous Condition 6.
Condition 20 (previous Condition 23)	Removal of Note 1 as these bores have now been installed. Refer to comment for previous Condition 6. Other Note numbers updated.
Condition 26(b) (previous Condition 29)	Removal of reference to 'monitoring bores to be constructed and installed as specified in Table 3'. As this requirement has been met.
Condition 32 (previous Condition 8)	Removal of reference to 'monitoring bores' as this requirement has been met.
Condition 33	Updated in line with the latest licence format wording.
Condition 35	Updated in line with the latest licence format wording. Table updated to align condition and table numbering. Table updated to specify in more detail the requirements the Licence Holder must provide within the Environmental Report for each condition.
Previous Condition 36	Deleted. These requirements are now outlined within the table for Condition 35.
Definitions	Updated as applicable.
Figures	Inclusion of Figure 1, Figure 9 and Figure 10. Removal of previous Figure 7.

References

1. AIM Mining Corporation Limited (AIM) 2025, *Golden Eagle Processing Plant Upgrade,* Part V of the EP Act Licence Amendment – Supporting Document (Ref: 304501647), Rev No. O, prepared by Stantec Australia Pty Ltd for AIM, dated 17 October 2025.
2. AIM 2026a, *Amendment to License L8675/2012/1 2nd RFI – Pathway Forward*, email received 16 January 2026.
3. AIM 2026b, *Golden Eagle Processing Plant Upgrade (Construction Only),* Part V of the EP Act Licence Amendment – Supporting Document, Rev No. 1, dated 28 January 2026.
4. AIM 2026c, *Addendum to License Amendment Application for Golden Eagle Processing Plant Upgrade (Construction Only)*, Part V of the EP Act Licence Amendment – Supporting Document, Rev. No. O, dated 16 February 2026.
5. AIM 2026d, *RE: L8675/2012/1 Draft Licence & Amendment Report Response*, received 14 April 2026.
6. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
7. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
8. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
9. Resource Engineering Consultants Pty Ltd (REC) 2022, *Critical Containment Infrastructure Report, Nullagine Gold Project*, Western Australia Novo Resources Corp. (Rev A), dated 1 April 2022 (DWER reference: DWERDT635032).

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

Condition	Summary of Licence Holder's comment	Department's response
Premises details	The Licence Holder has advised that tenements P46/1675, P46/1704, P46/1705, P46/1706, P46/1757, P46/1758, P46/1824, P46/1922, P46/1923, P46/1934, P46/2027, M46/441, M46/426 and M46/527 can be removed from the premises boundary.	The department has updated the tenure for the premises details as requested.
Condition 7, Table 5 for the Pipelines (tailings and return water)	AIM have stated that this infrastructure was constructed prior to them taking ownership of the Nullagine Gold Project. AIM have been unable to find any evidence of submission of compliance documentation relating to this infrastructure in the available records, as complete records were not received from previous owners.	The construction requirements for the pipelines (tailings and return water) were updated on the Licence when it was amended on 7 June 2024. During that amendment - • The construction requirements for TSF2 were removed based on *The TSF2 Stage 2B Critical Containment Infrastructure report was provided as part of this licence amendment application*. • A previous condition was deleted and inserted into the construction requirement table – *The Licence Holder must ensure that all pipelines or sections of pipelines containing tailings and decant return water are either:* (a) *equipped with telemetry; or* (b) *equipped with automatic cut-outs in the event of a pipe failure; or* (c) *provided with secondary containment sufficient to contain any spill for a period equal to the time between routine*

Condition	Summary of Licence Holder's comment	Department's response
		inspections. Within *REC 2022*, the department has viewed images showing the HDPE tailings delivery pipeline; spigot and tailings delivery; and embankment and floor erosion protection. The department has removed the construction requirements for the pipelines. The department has retained any applicable operational requirements for the pipelines and applied these through condition 11.
Condition 7, Table 5 for the Power Station	AIM have stated that this infrastructure was constructed prior to them taking ownership of the Nullagine Gold Project. AIM have been unable to find any evidence of submission of compliance documentation relating to this infrastructure in the available records, as complete records were not received from previous owners.	The construction requirements and emission points to air for the power station were applied to the Licence when it was amended on 5 November 2021. Since the power station is operational and the existing Licence includes authorised emission points (condition 12) associated with this infrastructure, the department has removed the construction requirements.
Condition 7, Table 5 for the Concrete batching plant	The Licence Holder has stated that this has been constructed and environmental compliance report was previously submitted to DWER.	While, the Licence Holder has stated that an environmental compliance report was previously submitted, the department was unable to find evidence of this. Nevertheless the report submitted with the Licence Holder's comments has now been uploaded into the department's Environment Online (APP-0035083). The department has removed the construction requirements for the concrete batching plant.
Condition 7, Table 5 for the Oil-water separator	The Licence Holder has stated that this has been constructed and environmental compliance report was previously submitted to DWER.	An environmental compliance report was received by the department on 10 March 2026 (APP-0034200). The department has removed the construction requirements for the oil-water separator.

Condition	Summary of Licence Holder's comment	Department's response
Condition 7, Table 5 for the Flotation circuit	The Licence Holder has stated - • Stibnite flotation circuit - the rougher circuit will contain up to five 20 m^3 open topped steel cells, not 19 m^3. • Sulphide flotation circuit - the rougher circuit will contain up to seven 70 m^3 open topped steel cells, not 100 m^3.	The department has updated the Licence as requested.
Condition 7, Table 5 for the Process Water Dam	The Licence Holder has requested that the Process Water Dam be referred to as the Flotation Water Dam. The Flotation Water Dam is: • Designed to be nominally 55 m (length) x 40 m (width) and 5.8 m (height), not 40 m (length) x 40 m (width) and 4 m (height). The 5.8m height includes the freeboard of 300 mm. • Capacity to hold 5,000,000 litres of water, not 6,400,000 litres of water.	The department has updated the Licence as requested. The Amendment Report has also been updated to now reference the Flotation Water Dam.
Condition 7	The Licence Holder has confirmed that this Licence Amendment is for construction only and that there will be no deposition of tailings to TSF2 from the refractory circuit (encompassing the flotation circuit tank area and flotation circuit, nor from the flotation water dam, prior to submission and DWER approval of a Licence Amendment to operate the refractory circuit.	The department notes this.
Condition 26	The Licence Holder has requested an extension to the time frame from six months to ten months. The Licence Holder has stated that recommissioning of the Golden Eagle Mill is underway though deposition of tails has not yet started, a company is being engaged to undertake the geophysical assessment at the appropriate time and a hydrogeologist has been engaged. The Licence Holder will endeavour to submit the report as soon as possible, however, given current constraints regarding consultants workloads a buffer of 4 months to ensure compliances is requested.	The department has made the requested change.

Condition	Summary of Licence Holder's comment	Department's response
Schedule 1: Maps	The Licence Holder has provided updated Figures for: • Figure 1: Premises boundary has been adjusted to remove tenure not owned by the Licence Holder. • Figure 2: Changes to premises boundary to align with Figure 1. • Figure 3: Updated to reference TSF2 rather than TSF3. • Figure 4. • Figure 6: Figure has been updated, note separate stockpiles will be maintained for the Beatons Creek ore. Please rename Figure 'Location of Golden Eagle ROM Pad'. • Figure 7. • Figure 9: Change of name to Flotation Water Dam. • Figure 10: Changed to an up to date figure. • Figure 11: Updated figure with premises boundary. • Figure 12: Updated figure with premises boundary. • Figure 13: Updated figure with premises boundary. The Licence Holder has advised that Figure 14 can be removed as the bores have now been constructed, all compliance bores for the licence are covered in Figures 11, 12 and 13.	The department has updated the Figures in the Licence as requested.
Condition 19, Table 12 and Condition 20, Table 13 for M17	In reviewing the premises boundary for the draft licence the Licence Holder has noted that compliance bore M17 is not on the Licence Holder's tenure. M17 is located on M46/432, which has now been pegged by Cufe Ltd. The Licence Holder will seek permission to enter the tenement to access this bore. The Licence Holder seeks advice from DWER if this will be a satisfactory arrangement or if the Licence Holder will need to peg new tenure to cover this bore. Alternatively, as part of the hydrogeological investigation required for the restart of TSF2 (Condition 26) the Licence Holder could seek advice on an alternative location for a monitoring bore within existing tenure.	If the Licence Holder is able to access the tenure to sample M17 than the department considers this a satisfactory arrangement. If access is restricted the Licence Holder can report this in the annual reports and/or subsequently apply for the removal of M17 / inclusion of a new location under a licence amendment application separate to this one.