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	L9221/2019/1
Licence Holder	Fortescue Ltd
ACN	002 594 872
File Number	APP-0026333
Premises	Eliwana Iron Ore Mine Mining Tenements M47/1509, M47/1522, and part of tenements M47/1523, M47/1524, M47/1525, M47/1526, M47/1537, M47/1601, L47/807 and L47/1075 HAMERSLEY RANGE WA 6716 As defined by the Premises map attached to the Revised Licence
Date of Report	02 July 2025 **(FINAL)**
Decision	Revised licence granted

Table of Contents

1. Decision summary

Licence L9221/2019/1 is held by Fortescue Ltd (Licence Holder) for the Eliwana Iron Ore Mine (the Premises), located approximately 90 km north-west of Tom Price.

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 L9221/2019/1 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

On 10 October 2024, the Licence Holder submitted an application (Fortescue 2024e) to the department to amend Licence L9221/2019/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Power generation (category 52) – refer to section 2.2.1
    - include the power generation areas constructed under W6779/2023/1; and
    - include construction requirements for the Non-Process Infrastructure (NPI) facility power generation from W6779/2023/1 yet to be constructed.
- Wastewater treatment plants (WWTPs) (category 54) – refer to section 2.2.2
    - include the Eliwana Flying Fish Camp WWTP constructed under W6664/2022/1; and
    - increase the Kartajirri WWTP capacity and volume of reverse osmosis (RO) brine to the irrigation sprayfield.
- Category 73 – refer to section 2.2.3
    - include the Autonomous Road Train (ART) Workshop constructed under W6779/2023/1; and
    - include construction requirements for the NPI facility (maintenance and refuelling areas including washdown bays and oily water separators (OWS)) from W6779/2023/1 yet to be constructed.
- Expansion of the prescribed premises boundary – refer to section 2.2.4
- Other amendments – refer to section 2.2.5.

Table 1 below outlines the current approved and any proposed changes to the category design capacities of the existing Licence.

Table 1: Existing design capacity and proposed changes

Category	Current design capacity	Proposed design capacity	Description of proposed amendment
5	35,000,000 tonnes per annual period	No change	No change
6	Volume as specified under Ministerial Statement 1109	No change	No change
12	1,000,000 tonnes per annual period	No change	No change
52	30.4 MW	33.5 MW	Increase of 3.1 MW from the infrastructure assessed under W6779/2023/1
54	350 cubic metres (m^3) per day (m^3/day)	472.5 m^3/day of effluent, plus 251.5 m^3/day of waste RO brine	Kartajirri Camp WWP and sprayfield 35 m^3/day increase (350 to 385 m^3/day) in design capacity Disposal via irrigation not to exceed 610 m^3/day of blended effluent (385 m^3/day of treated effluent; and 225 m^3/day of RO brine) Eliwana Flying Fish Camp WWTP and sprayfield Inclusion of the 87.5 m^3/day WWTP constructed under W6664/2022/1 Disposal via irrigation not to exceed 114 m^3/day of blended effluent (87.5 m^3/day of treated effluent; and 26.5 m^3/day of RO brine)
57	5,000 tyres	No change	No change
62	6,000 tonnes per annual period	No change	No change
63	7,000 tonnes per annual period	No change	No change
64	10,000 tonnes per annual period	No change	No change
73	6,500 m^3 in aggregate	7,500 m^3 in aggregate	Increase of 1,000 m^3 from the infrastructure assessed under W6779/2023/1
77	18,000 tonnes per annual period	No change	No change

2.2.1 Power generation

The Licence Holder has requested to transfer the Eliwana NPI Facility and ART workshop power generation infrastructure constructed under W6779/2023/1 to this Licence.

The following Environmental Compliance Reports (ECRs) have been submitted:

- Power generation for the ART workshop, received by the department on 07 August 2024 (Fortescue 2024a);
- Power generation for Eliwana Flying Fish Camp WWTP and associated areas, received by the department on 14 August 2024 (Fortescue 2024b);

Associated with W6779/2023/1, power generation for the NPI facility which includes the following has not been constructed:

- Installation of two duty generators including 2 x 350 kVA and one standby generator 350 kVA.

This infrastructure has been included to the Licence under this amendment through condition 1 – construction requirements; and condition 3 – operational requirements.

The Licence Holder will be authorised to operate the infrastructure following submission of compliance documentation for this item of infrastructure once constructed/installed in accordance with conditions 2 and 14 (previous condition 9) of the Licence.

Note that the power generators constructed under W6779/2023/1 are below the capacity to trigger category 52 under Schedule 1 of the *Environmental Protection Regulations 1987*. While the design capacity of category 52 has increased (refer to Table 1); and the emission points included on the Licence (condition 4), no risk assessment of these emission points has been undertaken.

2.2.2 WWTPs

Eliwana Flying Fish Camp WWTP, sprayfield and RO plant

The Licence Holder has requested to transfer the Eliwana Flying Fish Camp WWTP constructed under W6664/2022/1 to this Licence.

The ECR (Fortescue 2024d) was submitted to the department on 11 September 2024. The department determined non-compliance with condition 1 of W6664/2022/1 based on the deviations to the original assessed design which are shown in Table 2 below.

Table 2: Summary of deviations to works approval conditions

Infrastructure	Original design	Deviation to design
WWTP	2x Aeration/decant tanks with a combined storage of 100 kilolitres (kL)	Single 120 kL Aeration/decant tank
	Anoxic tank of 50 kL capacity	Single 120 kL recirculating anoxic buffer tank
	Raw wastewater storage balance tank of 50 kL capacity	
	All above ground infrastructure must be located on an impervious, bunded hardstand	All above ground infrastructure has been installed on a compacted, bunded pad with drainage directed to the overflow lagoon
	Not assessed	A 50 kL RO brine receival and buffering

Infrastructure	Original design	Deviation to design
		tank has been installed within the WWTP compound
Irrigation spray field	Installation of minimum 20 sprinkler units over 3 ha	15 x large bore sprinklers over 3 ha
All infrastructure and equipment	All above ground infrastructure must be located on an impervious, bunded hardstand	The above ground infrastructure has been installed on a compacted, bunded pad with drainage directed to the overflow lagoon
Infrastructure location for WWTP, irrigation spray field and overflow lagoon	-	Minor alignment changes have occurred due to a small portion of the prescribed premises boundary sitting outside of the Eliwana Mining Proposal footprint and associated tenure. All infrastructure has remained within the prescribed premises boundary.

The Eliwana Flying Fish Camp WWTP accommodates 250 persons with a treatment capacity of up to 87.5 m^3 of raw wastewater effluent (350 litres per person per day).

A RO plant has been constructed at the camp to produce potable water. RO reject water is mixed with treated effluent prior to discharge to the 3 hectare (ha) sprayfield. The estimated RO reject water discharge volume is 26.5 kL per day (kL/day) (26.5 m^3/day) thus a combined total of 114 kL/day (114 m^3/day) of RO reject and treated effluent is to be discharged to the sprayfield.

A Total Dissolved Solids (TDS) concentration of < 1,500 mg/L is expected (Table 3).

Kartajirri Camp WWTP, sprayfield and RO plants

Existing *Licence L9221/2019/1 Amendment Report* states the following:

- The WWTP treats up to 350 m^3 per day of raw sewage from the mine camp, administration and construction offices.
- The brine source is from 2x 350 kL/day RO plants that are used to supply potable water for the project. The Licence Holder has confirmed that each RO plant is capable of discharging 70 kL of brine per day. However, only one RO plant is operational at any one time, as the additional RO plant is used as a back up during a maintenance or breakdown period. Therefore, up to 70 kL/day of brine will be mixed with treated sewage prior to discharge to the sprayfield.

The existing Kartajirri sprayfield is sized at 8.75 ha.

The Licence Holder has stated (Fortescue 2025b) that an internal assessment was undertaken of the current infrastructure capacity. The findings were that the WWTP has sufficient capacity to treat an additional 35 kL/day.

Therefore, the WWTP plant can process up to 385 m^3/day with optimisation to the process flow cycles, aeration sequences and implementation of software changes to achieve the following outcomes:

1. Implement extended aeration after each fill cycle
2. Optimise the outfeed flow from the balance tanks to flatten morning and evening peak hydraulic flow periods (effectively giving the process additional time to process peak inflows without compromising processing safety margins).

This has resulted in the WWTP having an assessed design capacity of 385 m^3/day.

The Licence Holder also wished to clarify that the RO plants do not have a capacity per se; rather, the volume of RO brine fluctuates based on the potable water demand.

The Licence Holder has since revised the proposed volume of RO brine discharging to the Kartajirri sprayfield based on the current production on-site. The realised RO discharge from each RO plant has been up to a maximum of 4.7 m^3/hour, which amounts to 112.8 kL/day. Cumulatively, both plants produce up to 225 kL/day of RO brine.

The contributing factors to the increase in RO brine production are due to an increase in potable water demand across the site. This has resulted in necessary adjustments to the potable water recovery rates to meet demand. Additionally, there have also been fluctuations in water recovery rates due to seasonal changes in water temperature. Higher water temperatures can lead to inefficiencies in permeate production and increases in RO reject.

The Licence Holder has requested the volume of RO brine discharged to the Kartajirri sprayfield be increased (from 70 kL/day) to 225 kL/day to align with the projected and current brine estimates (Fortescue 2025b).

A TDS concentration of < 1,000 mg/L is expected (Table 5).

Blended effluent quality and soil sodicity risks for both WWTPs

Eliwana Flying Fish Camp WWTP sprayfield

The blended effluent consists of a maximum 87.5 m^3/day of treated effluent; and 26.5 m^3 of RO brine, for a maximum combined irrigation discharge total of up to 114 m^3/day.

W6664/2022/1 Report included the proposed effluent quality to be discharged to the irrigation sprayfield. This is shown in Table 3 below.

Table 3: Proposed effluent quality to be discharged to the irrigation sprayfield

Parameter	Expected concentration
5-day biochemical oxygen demand (BOD_5)	<20mg/L
pH	6.5-8.5
Total suspended solids (TSS)	<30mg/L
Total nitrogen (TN)	<30mg/L**
Total phosphorous (TP)	<8mg/L**
Total dissolved solids (TDS)	<1500mg/L
E. coli	<1000cfu/100mL
Residual free chlorine	0.2 – 2.0mg/L*
Sodium ions (Na^+)	136.6 mg/L***
Calcium ions (Ca^{2+})	79.1 mg/L***
Magnesium ions (Mg^{2+})	48.2 mg/L***
Electrical conductivity	1530 µs/cm***

*Residual free chlorine concentrations may be measured in treated wastewater prior to mixing with RO reject.
**Analysed over an annual period to assess nutrient loading potential.
*** Calculated from supply bore sampling results and addition of the human component (sewage, chemicals etc.) Expected human component increases adapted from information provided by the applicant for W6596/2021/1.

The Licence Holder provided an Environmental Commissioning Report (Fortescue 2025a) to the department on 22 January 2025.

Table 4 shows the blended effluent results from the WWTP during the commissioning period (November – December 2024).

Table 4: Blended effluent monitoring results

	Parameter and unit						
	5-Day BOD (mg/L)	**Total Nitrogen (mg/L)**	**Total Phosphorus (mg/L)**	***E.coli* (cfu/100 mL)**	**Residual Chlorine (mg/L)**	**pH (pH units)**	**TSS (mg/L)**
Expected criteria	**<20**	**<30**	**<8**	**<1,000**	**0.2-2.0**	**6.5-8.5**	**<30**
10/11/2024	<5.0	1.2	0.38	4.0	0.07	7.07	8.0
17/11/2024	**27**	1.8	0.37	**2,100**	0.05	7.8	<5
24/11/2024	<5	8.9	3.0	**>150,000**	0.05	7.8	**86.0**
01/12/2024	20	7.0	1.1	<10	0.51	7.97	9.0
08/12/2024	13	8.4	1.1	<1	1.3	7.6	14
15/12/2024	**76**	30	0.82	**2,900**	**3.2**	7.9	28
22/12/2024	8.9	0.64	0.33	<1	**2.9**	7.9	<5

Yellow highlight denotes exceedances of criteria

Irrigation using blended effluent has the potential to modify major cation ratios in the receiving soil, causing loss of soil structure and dispersion. This can occur where the irrigation water being discharged has a high proportion of sodium ions in relation to calcium and magnesium ions (commonly referred to as the Sodium Adsorption Ratio (SAR)), as well as a low electrical conductivity (EC).

SAR is an indicator of the suitability of water for use in irrigation. Generally, the higher the SAR the less suitable the water is for irrigation, depending on the water's EC. The *Australian and New Zealand Guidelines for Fresh and Marine Water Quality, Volume 3, Primary Industries* (ANZECC 2000) describes a relationship between SAR and EC that can be used to determine the suitability of an effluent for irrigation, whereby a high SAR may be tolerable if effluent also has a high EC. The relationship between SAR, EC and soil structural impacts is shown in Figure 1.

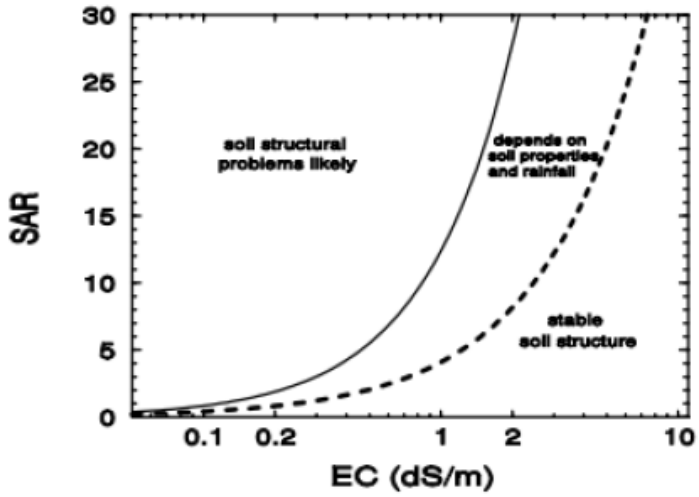

Figure 1: Relationship between SAR and EC of irrigation water for prediction of soil structural stability

A calculation for determining the SAR of an effluent is provided in the guideline document *Use of Effluent by Irrigation* (DEC NSW 2004), as depicted below:

$$SAR = \frac{Na^{+}}{\left[\frac{\left(Ca^{2+} + Mg^{2+}\right)}{2}\right]^{0.5}}$$

Where:
Na = sodium ion concentration (conc.) (meq/L) = (mg/L in effluent) / 22.99
Ca = calcium ion conc. (meq/L) = (mg/L in effluent) / (40.08 x 0.5)
Mg = magnesium ion conc. (meq/L) = (mg/L in effluent) / (24.32 x 0.5)

The SAR for the Eliwana Flying Fish Camp WWTP sprayfield has been calculated using the expected concentration values in Table 3 (for Na, Ca and Mg). This results in a calculated SAR value of 3.01. When compared with the expected EC in Table 3 (1,530 µS/cm or 2.3715 dS/m) and plotted on the graph shown in Figure 1, the blended effluent is not considered likely to cause soil structural problems overtime.

Kartajirri Camp WWTP sprayfield

The blended effluent consists of a maximum 385 m^3/day of treated effluent; and 225 m^3 of RO brine, for a maximum combined irrigation discharge total of up to 610 m^3/day.

Licence L9221/2019/1 Amendment Report included the expected treated effluent quality during operation. This is shown in Table 5 below.

Table 5: Expected treated effluent quality during operation

Parameter	Concentration
5-Day Biochemical Oxygen Demand (BOD_5)	<20 mg/L
Total Suspended Solids (TSS)	<30 mg/L
Total Nitrogen (TN)	<30 mg/L
Total Phosphorus (TP)	<7.5 mg/L
E.coli	<1000 cfu/100 mL
Residual Free Chlorine	>0.5 mg/L – <2.0 mg/L
pH	>6.5 – <8.5
Total dissolved solids (TDS)	<1000mg/L

The Licence Holder provided (Fortescue 2025c) the blended results for the Kartajirri Camp WWTP as shown in Table 6.

Table 6: Blended results for the Kartajirri Camp WWTP

Parameter	Blended effluent result
Sodium	110 mg/L
Calcium	51 mg/L
Magnesium	27 mg/L
Electrical Conductivity (EC)	935 µs/cm

The SAR for the Kartajirri Camp WWTP sprayfield has been calculated using the expected concentration values in Table 6 (for Sodium, Calcium and Magnesium). This results in a calculated SAR value of 3.12. When compared with the expected EC in Table 6 (935 µS/cm or 1.44925 dS/m) and plotted on the graph shown in Figure 1, the blended effluent is not considered likely to cause soil structural problems overtime.

Irrigation sprayfield sizing for both WWTPs

Blended effluent from each WWTP is disposed of by spray irrigation. The Kartajirri Camp WWTP sprayfield is 8.75 ha; and Eliwana Flying Fish Camp WWTP sprayfield is 3 ha.

The sprayfield design has considered the nutrient application criteria for Risk Category D soil type (WQPN 22). Expected nutrient loading rates are shown in Table 7.

Table 7: Nutrient application criteria

Maximum Treated Effluent Rate + Volume of Addition Effluent	Expected performance	Application rate for Category D soil[1]	Expected annual nutrient loading rate	Recommended Minimum Sprayfield sizing
Kartajirri Camp WWTP				
385 m^3/day of treated effluent + 225 m^3/day of RO brine	30 mg/L Total Nitrogen	480 kg/ha/year	481.8 kg/ha/year	8.78 ha
	7.5 mg/L Total Phosphorus	120 kg/ha/year	120.5 kg/ha/year	8.78 ha
Eliwana Flying Fish Camp WWTP				
87.5 m^3/day of treated effluent + 26.5 m^3/day of RO brine	30 mg/L Total Nitrogen	480 kg/ha/year	109.5 kg/ha/year	2.0 ha
	8 mg/L Total Phosphorus	120 kg/ha/year	29.2 kg/ha/year	2.13 ha

Note 1: WQPN 22 – Table 2: Nutrient application criteria to control eutrophication risk

Table 7 shows that the recommended minimum sprayfield sizing for the Kartajirri Camp WWTP is 8.78 ha. The existing sprayfield is sized at 8.75 ha. The Licence Holder has stated (Fortescue 2024e) that the average treated water quality loading rates are 12 mg/L for Total Nitrogen; and 4.25 mg/L for Total Phosphorus. At these values the minimum area required would be below 8.75 ha.

Refer to section 3 for the department's risk assessment for the operation of the WWTPs.

2.2.3 Category 73

W6779/2023/1 allowed for the onsite storage of a combined total of approximately 1,000 m^3 in aggregate of bulk fuel and chemicals across the NPI facility and ART workshop.

The Licence Holder has requested to transfer the ART workshop infrastructure constructed under W6779/2023/1 to this Licence.

An ECR for the ART workshop maintenance facility including the washdown area and treatment system, was received by the department on 21 August 2024 (Fortescue 2024c).

During this amendment the ART workshop has been included to condition 3 for operational requirements.

Associated with W6779/2023/1 the following infrastructure has not been constructed:

- Bulk fuel and chemical storage areas to store 1,000 m^3 (in aggregate); and
- NPI facility maintenance and refuelling areas.

This infrastructure has been included to the Licence under this amendment through condition 1 – construction requirements; and condition 3 – operational requirements.

The Licence Holder will be authorised to operate the infrastructure following submission of

compliance documentation for these items of infrastructure once constructed/installed in accordance with conditions 2 and 14 (previous condition 9) of the Licence.

The Licence Holder intends to use OWS treated water within the prescribed premises boundary on access road, camps, within currently approved disturbed, active operational areas, hardstands and cleared ground, and preconditioning or stockpile management and other uses as deemed fit (Fortescue 2025c).

Authorised discharge points for the OWS treated wastewater discharges for dust suppression have been added to the Licence under this amendment through condition 4.

Refer to section 3 for the department's risk assessment of the fuel storage and OWS treated water disposal.

2.2.4 Expansion of prescribed premises boundary

The Licence Holder originally requested to extend the prescribed premises boundary to include a portion of L47/807, L47/1075, L47/1158 and L47/1159.

Tenements L47/1158 and L47/1159 are currently 'pending'. The Licence Holder has stated (Fortescue 2025c) that these tenements are now forecasted to be granted in July 2026. The Licence Holder now requests that these proposed tenements be excluded from the scope of this amendment.

The department has expanded the prescribed premises boundary to include a portion of L47/807 and L47/1075 only.

Figure 1 (Premises map) in Schedule 1 of the Licence has been updated.

2.2.5 Other amendments

The Licence Holder has also requested the following:

- Condition 3 for the Eliwana Concrete Batch Plant (CBP) and Flying Fish CBP that the operational requirement of 'intermittent wetting applied for stockpiles' be removed. The Licence Holder requested the removal of this operational requirement to ensure consistency and to support improved compliance outcomes.

  The Licence Holder has stated (Fortescue 2025b) that they will "*ensure that stockpiles are adequately covered and/or treated (if and as required) to minimise airborne dust without the requirement of intermittent wetting applied for stockpiles*."

  The department has removed this requirement. Noting that the *Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations 1998* apply which has requirements on the storage of aggregate and sand.

- Condition 7(h) (previous condition 6(h)) pertaining to 'no livestock is permitted to graze the irrigation area' be removed. The Licence Holder has stated that they will continue to undertake regular inspections of the irrigation sprayfield fence, if and as required, to ensure that livestock does not enter the irrigation sprayfield as much as reasonably possible.

  The department has made the requested change.

- Update to the inert waste disposal areas to reflect the updated 5-year mine plan.

  The inert waste pit disposal areas allows for the disposal of the following waste types within waste rock dumps and mined pit voids:

  - Inert waste type 1 (concrete)
  - Inert waste type 2 (rubber and tyres)
  - Putrescible waste (untreated timber only).

The department has made the requested change. The Licence has existing operational requirements (through condition 3) for the used tyre storage and disposal area; and the Class I inert landfill, which the Licence Holder must abide by.

2.3 Part IV of the EP Act

The Eliwana Iron Ore Mine Project was assessed by the Environmental Protection Authority (EPA) and approved under Ministerial Statement (MS) 1109.

MS 1109 has conditions relating to following:

- Condition 7 - Flora and Vegetation
- Condition 8 - Acid and Metalliferous Drainage Investigations
- Condition 9 - Inland waters
- Condition 10 - Terrestrial Fauna
- Condition 11 - Subterranean Fauna
- Condition 12 - Avoidance of Significant Heritage Sites
- Condition 13 - Social Cultural and Heritage Management Plan
- Condition 14 - Air Quality.

MS 1109 allows up to 4 gigalitres per annum of surplus water to be discharged to the environment through a combination of surface discharge and controlled aquifer reinjection.

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 8 below. Table 8 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 8: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Eliwana Flying Fish Camp WWTP (Fortescue 2024e, Fortescue 2025a and W6664/2022/1 Report)			

Sewage partially treated sewage, RO brine, and/or nutrient rich treated effluent	Operation of the Eliwana Flying Fish Camp WWTP	Discharges to land from overtopping of tanks	• WWTP designed to be fully contained.
			• WWTP installed with an alarm system of warning beacons, as well as audible and visual pump fault alarms which will activate in the event of:
			  ○ Pump faults
			  ○ High tank levels
			  ○ Tank overflows.
			• Overflow lagoon with a high density polyethylene (HDPE) / impermeable liner and provides 200 kL of emergency overflow storage.
			• 0.5 m freeboard maintained on the overflow lagoon.
			• Monitored with regular inspections.

Pipelines leaks and spills resulting in sewage discharge		Discharges to land from pipeline leaks / spills	• All above ground infrastructure installed on a compacted, bunded pad with drainage directed to the overflow lagoon. • Flow meters located on the WWTP inlet, RO brine pipeline outlet and output line after the WWTP. • All sewage storage and treatment tanks, vessels, pipework, fittings and joins constructed of impervious material which are designed to be free from leaks and defects.
Blended wastewater (treated effluent and RO brine), nutrient rich treated effluent		Direct discharges to sprayfield	• 5 m spray drift buffer from edge of sprinkler radius. • Controlled discharge to the 3 ha irrigation sprayfield to prevent ponding. • Regular monitoring of treated wastewater quality. • Size of sprayfield meets the nutrient loading criteria for WQPN 22.
Contaminated stormwater		Overland runoff Rainfall ingress	• All above ground infrastructure installed on a compacted, bunded pad with drainage directed to the overflow lagoon. • Bunds and diversion drains installed

Emission	Sources	Potential pathways	Proposed controls
			where required to divert uncontaminated stormwater away from the irrigation sprayfield.
Kartajirri Camp WWTP (Licence L9221/2019/1 Amendment Report*)*			
Blended wastewater (treated effluent and RO brine), nutrient rich treated effluent	Increase in volume of treated effluent and RO brine discharged via spray irrigation	Direct discharges to sprayfield	• Blending of treated wastewater with waste RO brine prior to discharge. • Monitoring of the volume of effluent discharged to the sprayfield. • Monitoring of effluent quality to verify the WWTP performance. • Sprayfield area designed to mitigate contaminant application rates.
Fuel storage (W6779/2023/1 Decision Report)			
Chemical and/or hydrocarbon contaminated water from spills	Fuel storage and operation of NPI Facility and ART Workshop washbays	Discharges to land / seepage / infiltration	• Hydrocarbon storage tanks will be HDPE-lined and self-bunded in accordance with Australian Standards. • Bunds will have a net capacity of at least 110% the volume of the largest vessel. Recovery of all liquid directed to an oily water separator. • Washwater and spills captured and directed to OWS capable of treating to TRH <15 mg/L.
OWS treated water disposal			
Treated wastewater Potentially untreated wastewater	Water treated through the OWS used for dust suppression	Discharges to land / seepage / infiltration	• OWS capable of treating to TRH <15 mg/L. • Treated water from the separators is used for dust suppression as required, in accordance with WQPN 68. • Water cart operators trained and competent in the use of water carts, including sprays, to monitor for overspray and reduce fan width to ensure that spray is applied within delineated windrows and cleared areas. • Spray and dribble bars used to ensure that treated OWS water is controlled and easily directed to the required area. • Visual monitoring of native vegetation will be implemented, if and as required, to ensure that there are no impacts to vegetation. If impacts to vegetation are noted, the use of RO water will cease

Emission	Sources	Potential pathways	Proposed controls
			in that location until vegetation stabilizes. • The use of treated OWS water for dust suppression will not be conducted during and immediately following rainfall events, therefore reducing the possibility of surface water mobilizing potential salts. • Windrows around cleared / operational works areas maintained to prevent runoff. • Treated OWS water will not be used within major creek lines or drainage channels or in the vicinity of Conservation Significant Flora Species or Groundwater Dependent Vegetation.

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 9 and Figure 2, Figure 3 and Figure 4 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 9: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Native Title Holders The PKKP Aboriginal Corporation RNTBC	The premises is located within the PKKP Native Title Determination area (WCD2015/003). Native Title Holders visiting this area are considered a potential human receptor to activities on the premises.
Environmental receptors	**Distance from prescribed activity**
***Rights in Water and Irrigation Act 1914* (RIWI Act)** Proclaimed Pilbara Groundwater Area and Surface Water Area	Overlays the prescribed premises boundary.
Surface water	Pinarra Creek approximately 0.6 km from the WWTP; 0.7 km from the ART workshop and 2.5 km from the NPI Facility.
Groundwater	Groundwater is compartmentalized by dolerite dykes and low permeability strata. The groundwater depth at the camp is 43-50m (±10m).

Threatened Ecological Communities Priority 3 Triodia pisoliticola (previously Triodia sp. Robe River) assemblages of mesas of the West Pilbara	Located within the premises boundary, though located greater than 8 km from the nearest infrastructure (ART Workshop). **Regulated under MS 1109.**
Threatened / Priority Fauna • Northern Quoll (*Dasyurus hallucatus*) – Endangered • Ghost bat (*Macrodermia gigas*) – Vulnerable • Pilbara Leaf-Nosed Bat (*Rhinonicteris aurantia*) –Vulnerable • Pilbara Olive Python (*Liasis olivaceus barroni*) – Vulnerable • Western Pebble Mound Mouse (*Pseudomys chapmani*) – Priority 4 • Lined soil crevice skink (*Notoscincus butleri*) • Nankeen kestrel (*Falco cenchroides*) • Grey falcon (*Falco hypoleucos*) – Vulnerable • Peregrine falcon (*Falco peregrinus*)	Habitat identified within premises boundary. Recorded in vicinity (within 5 km) of premises boundary. **Pilbara Leaf-nosed bat; Ghost bat; Pilbara Olive Python; and Northern Quoll regulated under MS 1109.**
Priority Flora *Fortescue 2024e* includes the following: *Indigofera sp. Bungaroo Creek* – Priority 3 *Goodenia nuda* – Priority 4 *Rhynchosia unharness* – Priority 4	Recorded in vicinity and within 5 km of premises boundary.
Cultural receptors	**Distance from activity / prescribed premises**
Aboriginal heritage sites Several sites	Within and in the vicinity of the premises boundary. **Regulated under MS 1109.**

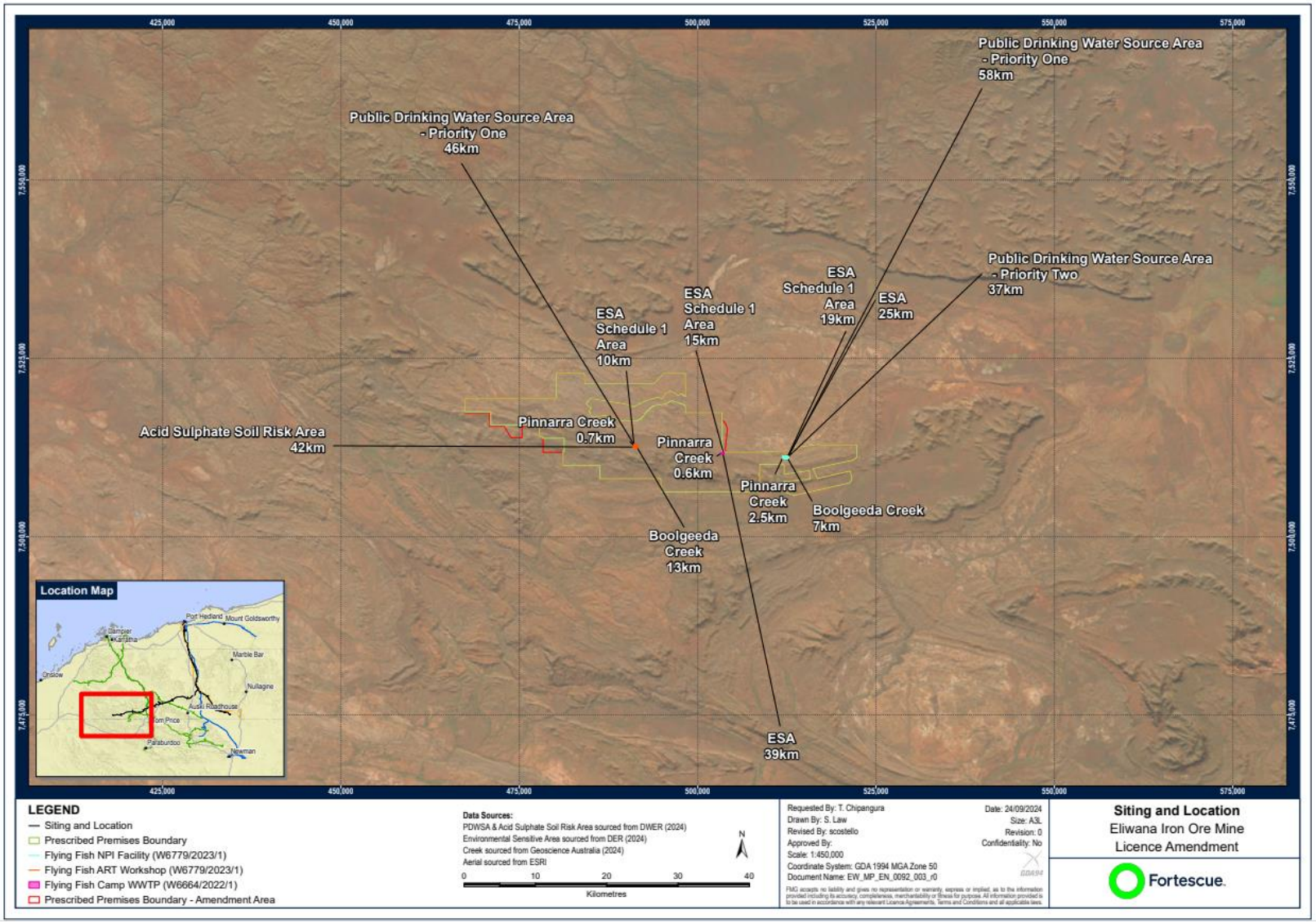

Figure 2: Distance to surface water

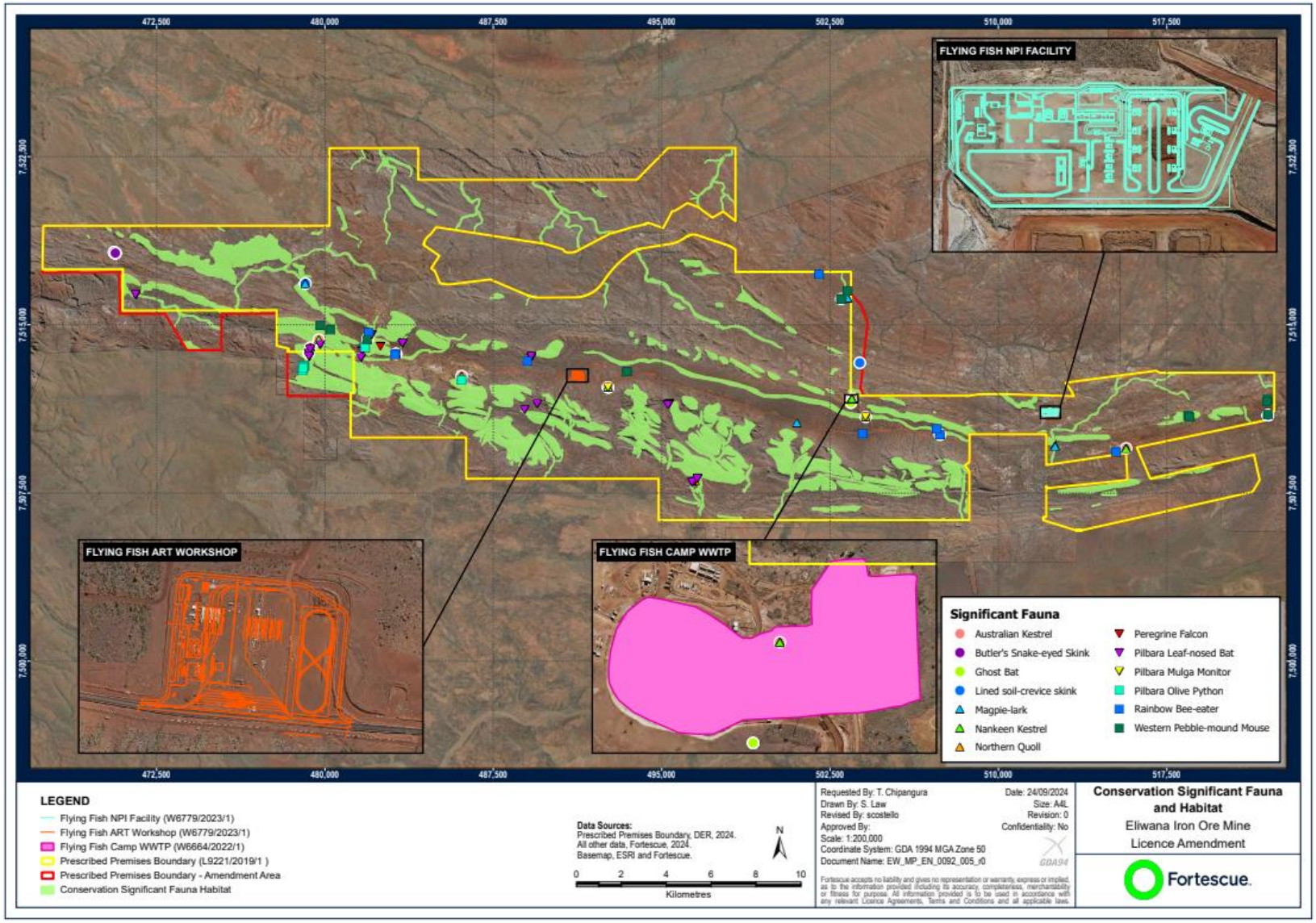

Figure 3: Conservation significant fauna and habitat

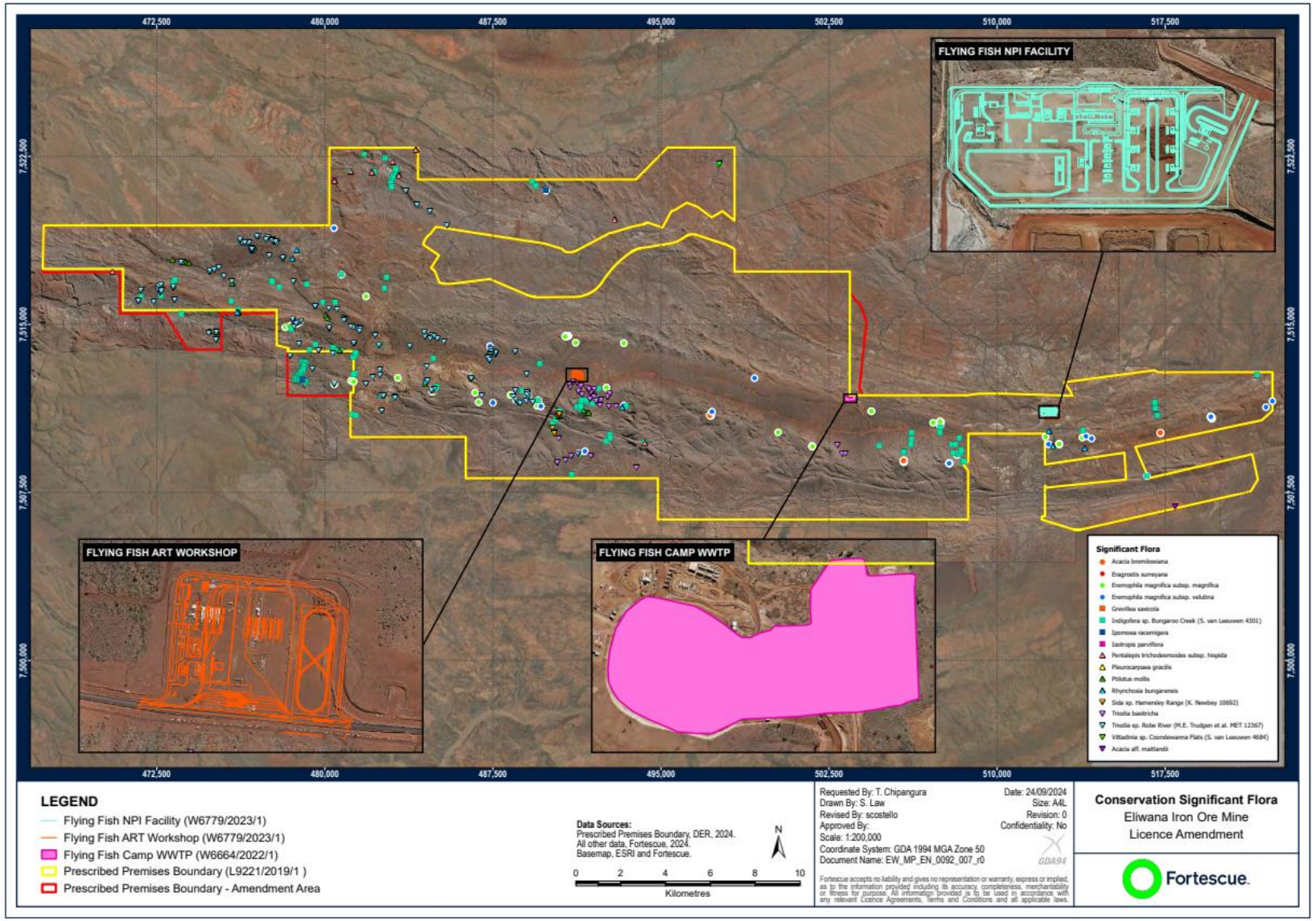

Figure 4: Conservation significant flora

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 10.

The Revised Licence L9221/2019/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

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

Table 10. Risk assessment of potential emissions and discharges from the Premises during operation

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification / additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Eliwana Flying Fish Camp WWTP								
Operation of the Eliwana Flying Fish Camp WWTP	Sewage partially treated sewage, RO brine, and/or nutrient rich treated effluent	Overtopping of sewage holding tanks resulting in sewage discharge Soil contamination, inhibiting vegetation growth and survival	Soil and vegetation adjacent to area of spill	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	Existing condition 3 – Operational requirements updated to include the Eliwana Flying Fish WWTP, sprayfield and overflow lagoon in accordance with W6664/2022/1	N/A
	Pipelines leaks and spills resulting in sewage discharge	Rupture of pipes resulting in sewage discharge Soil contamination, inhibiting vegetation growth and survival	Soil and vegetation at area of rupture	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	Condition 3 -Operational requirements	*Environmental Protection (Unauthorised Discharges) Regulations 2004* also applies
	Blended wastewater (treated effluent and RO brine), nutrient rich treated effluent	Direct planned discharges to sprayfield Elevated nutrient levels in soil Seepage to soil potentially causing loss of soil structure and	Soil and native vegetation	Refer to Section 3.1	C = Moderate L = Possible **Medium Risk**	N	Existing conditions on Licence L9221/2019/1 have been updated under this amendment to include the Eliwana Flying Fish WWTP including: • Condition 3 – Operational	WWTP output standards; and volume of blended effluent via irrigation applied through condition 3 Emissions limits for the sprayfield including annual

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification / additional regulatory controls
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
		dispersion					requirements • Condition 4 – Authorised discharge point for the sprayfield • Condition 7 – Sprayfield requirements • Condition 8 – Monitoring • Condition 19 - Reporting **New condition 6 – Emission limits has been applied to the licence under this amendment**	loading rates for Total Nitrogen and Total Phosphorus; and TDS applied through condition 6 to ensure WQPN 22 is adhered to
	Contaminated stormwater	Direct discharges to land from overland runoff and rainfall ingress	Soil Vegetation Surface water bodies	Refer to Section 3.1	C = Slight L = Unlikely **Low Risk**	Y	N/A	*Environmental Protection (Unauthorised Discharges) Regulations 2004* apply
Kartajirri Camp WWTP								
Increase in volume of treated effluent and RO brine discharged via spray irrigation	Blended wastewater (treated effluent and RO brine), nutrient rich treated effluent	Direct planned discharges to sprayfield Elevated nutrient levels in soil Seepage to soil potentially causing loss of soil structure and dispersion	Soil and native vegetation	Refer to Section 3.1	C = Moderate L = Possible **Medium Risk**	N	Existing condition 3 – Operation requirements has been updated to include the Kartajirri Camp WWTP **New condition 6 – Emission limits has been applied to the licence under this amendment** Existing conditions 4, 7, 8	WWTP output standards; and volume of blended effluent via irrigation applied through condition 3 Emissions limits for the sprayfield including annual loading rates for

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification / additional regulatory controls
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
							and 19 retained for the Kartajirri Camp WWTP	Total Nitrogen and Total Phosphorus; and TDS applied through condition 6 to ensure WQPN 22 is adhered to
Fuel storage								
Fuel storage and operation of NPI Facility and ART Workshop washbays	Chemical and/or hydrocarbon contaminated water from spills	Discharges to land / seepage / infiltration Soil and groundwater contamination	Soil Vegetation Groundwater Surface water bodies	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Existing conditions on Licence L9221/2019/1 have been updated under this amendment for the fuel storage including: • Condition 1 – Construction requirements • Condition 3 – Operational requirements	Construction requirements for the infrastructure not constructed under W6779/2023/1 has been applied through condition 1 *Environmental Protection (Unauthorised Discharges) Regulations 2004* also applies
OWS treated water disposal								
Water treated through the OWS used for dust suppression	Treated wastewater Potentially untreated wastewater	Discharges to land via dust suppression Untreated hydrocarbon wastewater and runoff impacting vegetation, soils and surface water Uncontrolled discharge	Vegetation Soil Surface water	Refer to Section 3.1	C = Minor L = Possible **Medium Risk**	Y	Existing conditions on Licence L9221/2019/1 have been updated under this amendment for the OWS and reuse of treated wastewater for dust suppression including: • Condition 1 – Construction requirements • Condition 3 –	Construction requirements for the NPI OWS not constructed under W6779/2023/1 has been applied through condition 1

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification / additional regulatory controls
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
							Operational requirements • Condition 4 – Authorised discharge points • Condition 8 – Monitoring • Condition 19 - Reporting	

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 11 provides a summary of the consultation undertaken by the department.

Table 11: Consultation

Consultation method	Comments received	Department response
The PKKP Aboriginal Corporation RNTBC advised of proposal 19 December 2024	No comments received.	N/A.
Department of Health (DoH) advised of proposal 19 December 2024	DoH replied on 29 January 2025 stating the following: DoH has no objection to the proposal subject to ensuring the wastewater treatment plant complies with the Department's legislative requirements, the *(Health Treatment of Sewage and Disposal of Effluent and Liquid Wastes) Regulations*, 1974 and policy objectives including the Government Sewerage Policy, 2019 (GSP). There are several issues that have been identified and will need to be addressed when a formal application is submitted to the DoH, these include: 1. The proposed upgrade development is in proximity to a major river system. The relocated land application area will require a site-specific Site and SoilEvaluation (SSE) to be undertaken by a qualified consultant during the wettest seasonal time of the year (Feb - March) as per AS/NZS 1547:2012 to ensure the land application area is located and sized appropriately. The proponent will be required to submit a formal application for each onsite wastewater treatment system, upgrade and or relocation of a system to the Local Government for assessment who will forward onto the DOH for assessment and approval. The proposal makes reference to recycled water and the DoH seeks clarification as to the purpose. Sewage intended to be reused or recycled for beneficial purposes such as landscape and garden bed irrigation, toilet flushing, industrial reuse or other purposes, will require prior approval from the Department of Health. Please refer to the "Application Process for approval of a recycling water scheme": https://ww2.health.wa.gov.au/Articles/A_E/Application-process-for-approval-of-recycling-water-scheme.	The department notes DoH comments. The Licence Holder has stated (Fortescue 2025b) that the Flying Fish Camp WWTP obtained DoH approval (Approval No: 131.23 dated 25 July 2023). This approval confirms that the plant complies with the *Health Treatment of Sewage and Disposal of Effluent and Liquid Wastes Regulations 1974* and policy objectives, including the Government Sewerage Policy, 2019 (GSP).

Consultation method	Comments received	Department response
	All drinking water provided on site must meet the health-related requirements of the Australian Drinking Water Quality Guidelines 2011.	
Licence Holder was provided with draft amendment on 06 June 2025	On 25 June 2025, the Licence Holder provided (Fortescue 2025c) – • Responses to the department's request for further information within the draft package; and • Comments on the draft package – Refer to Appendix 1.	Documents updated accordingly to incorporate the Licence Holder's responses. 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 12 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 the additional updates to the Licence following the draft package being provided to the Licence Holder on 06 June 2025.

Table 12: Summary of licence amendments

Condition no.	Proposed amendments
Registered business address	Updated
DWER file number	Updated to reference the Environment Online internal number
Premises details	Updated as part of the premises boundary expansion – refer to section 2.2.4
Prescribed premises category description	Increase in design capacity for category 52 – refer to Table 1 and section 2.2.1 Increase in design capacity for category 54 – refer to Table 1 and section 2.2.2 Increase in design capacity for category 73 – refer to Table 1 and section 2.2.3
Condition 1, Table 1	Administrative updates Inclusion of infrastructure not yet constructed from W6779/2023/1
Condition 2	Administrative updates
Condition 3, Table 2	Administrative updates Figure numbering corrected Inclusion of power generation areas constructed and yet to be constructed from W6779/2023/1 – refer to section 2.2.1 Inclusion of operational requirements for the Kartajirri Camp WWP and Irrigation Field including an increase in design capacity and increase in volume of RO brine to be disposed of via irrigation – refer to section 2.2.2 Inclusion of operational requirements for the Eliwana Flying Fish Camp WWTP, Spray Field and Overflow lagoon constructed under W6664/2022/1 – refer to section 2.2.2 Inclusion of the ART workshop and NPI facility and associated time limited operation conditions from W6779/2023/1 Remove requirement for ‘intermittent wetting applied for stockpiles’ for the Concrete Batch Plants – refer to section 2.2.5

Condition no.	Proposed amendments
Condition 4, Table 3	Include the Eliwana Flying Fish Camp WWTP Sprayfield as an authorised discharge point Include the Eliwana Flying Fish Camp power station generators; NPI Facility; and ART workshop generators as authorised discharge points Include the areas where OWS treated wastewater is reused for dust suppression as authorised discharge points
Condition 5, Table 4	Administrative updates
Condition 6, Table 5 (new condition)	Inclusion of new condition 6 for the emission limits for Total Nitrogen, Total Phosphorus and TDS for the WWTPs
Condition numbering	Updated throughout with the introduction of new conditions
Condition 8, Table 6 (previous condition 7)	Administrative updates Inclusion of monitoring requirements for the Eliwana Flying Fish Camp WWTP Inclusion of monitoring requirements for the OWS at the NPI facility and ART workshop
New conditions 9 to 12	Inclusion of conditions for sampling; analysis; duration between samples; calibration; and where calibration cannot be met
Condition 19 (previous condition 14)	Updated to reflect standard licence condition wording
Condition 20, Table 7	Updated to reflect standard licence condition wording Administrative updates Updated to include reporting requirements for condition 6 Updated to include reporting requirements for the Eliwana Flying Fish Camp WWTP and the OWS
Definitions, Table 8	Updated as applicable
Figures	Replacement of Figure 1 Inclusion of Figures 2, 3 and 4 Replacement of Figure 7 Inclusion of Figure 8 Replacement of Figure 12

References

1. Australian and New Zealand Environment and Conservation Council (ANZECC) 2000. *Australian and New Zealand Guidelines for Fresh and Marine Water Quality, Volume 3, Primary Industries*. Canberra, Australia.
2. Department of Environment and Conservation New South Wales (DEC NSW) 2004, *Environmental Guidelines: Use of effluent by irrigation*. Sydney, New South Wales.
3. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
5. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
6. Fortescue Ltd (Fortescue) 2024a, *Submission of Eliwana Environmental Compliance Report W6779/2023/1*, 07 August 2024 (DWER reference: DWERDT987739).
7. Fortescue 2024b, *Submission of Eliwana Environmental Compliance Report*, 14 August 2024 (DWER reference: DWERDT991290).
8. Fortescue 2024c, *Submission of Eliwana Environmental Compliance Report W6779/2023/1*, 21 August 2024 (DWER reference: DWERDT994217).
9. Fortescue 2024d, *Submission of Eliwana W6664/2022/1 Environmental Compliance Report*, 11 September 2024 (DWER reference: DWERDT1004926).
10. Fortescue 2024e, *Fortescue submission of the application to amend the Eliwana Iron Ore Mine licence L9221/2019/1* (ELP-2048, UID-185458), dated 10 October 2024.
11. Fortescue 2025a, *Works Approval W6664/2022/1 Compliance Verification - Environmental Commissioning*, *Environment – Eliwana* (EW-0000-RP-EN-0019) Rev 0, 22 January 2025.
12. Fortescue 2025b, *Fortescue Ltd (Fortescue) response to the RFI received for the amendment to the Eliwana Iron Ore Mine Licence L9221/2019/1*, 21 March 2025.
13. Fortescue 2025c, *Fortescue Ltd (Fortescue) response to the draft licence and decision report for the amendment to the Eliwana Iron Ore Mine Licence L9221/2019/1*, 25 June 2025.
14. *L9221/2019/1 Amendment Report* – granted 21 April 2020 (noting Amendment Report is dated 21 May 2020) available at https://www.der.wa.gov.au/our-work/licences-and-works-approvals/current-licences.
15. *W6664/2022/1* and *W6664/2022/1 Report* available at https://www.der.wa.gov.au/our-work/licences-and-works-approvals/current-licences.
16. *W6779/2023/1* available at https://www.der.wa.gov.au/our-work/licences-and-works-approvals/current-licences.
17. Water Quality Protection Note (WQPN) 22, *Irrigation with nutrient-rich wastewater*, Department of Water, July 2008.
18. WQPN 68, *Mechanical equipment wash down*, Department of Water, September 2013.

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

Condition	Summary of Licence Holder's comment	Department's response
Page 1 Assessed production / design capacity – Category 52	The Licence Holder requests that the assessed production / design capacity for Category 52 be amended from the 30.4 MW to 33.5 MW. Based on the draft licence, it appears that the proposed increase in Category 52 has not factored in the capacity of the standby generators at the NPI Facility, ART workshop and Eliwana Flying Fish Camp WWTP (additional total of 3.1 MW). The Licence Holder has stated that the breakdown for power generation under W6779/2023/1 is: Power generation for Eliwana Flying Fish Camp WWTP and associated areas: a) Construction of four gensets with a total capacity of 1 MW, comprised of 3 off-prime rated 250 kVA gensets (750 kVA) plus **one spare 250 kVA genset for redundancy or unanticipated overload**; and Power generation for NPI facility: c) Installation of two duty generators including 2 x 350 kVA and **one standby generator 350 kVA** Power generation for ART workshop: d) Installation of one duty generator 500 kVA and **one standby generator 5000 kVA** (typo, this should state 500 kVA).	The department has changed the Category 52 design capacity to 33.5 MW.
Condition 3, Table 2 Power generation	As above, Licence Holder requests that the design capacity for Category 52 be amended from 30.4 MW to 33.5 MW to factor in the design capacity of the backup generators.	
Condition 3,	The Licence Holder acknowledges that there may be instances during the	The department has not included the terminology

Condition	Summary of Licence Holder's comment	Department's response
Table 2 WWTPs – Kartajirri Camp WWTP and Eliwana Flying Fish Camp WWTP	operation of the Kartajirri Camp WWTP (and subsequent disposal of blended effluent to the irrigation sprayfield) where there may be fluctuations in the volume of blended effluent being discharged to the irrigation sprayfield due to factors such as: • Shutdowns and/or maintenance works. Therefore, to ensure compliance with the limits on the licence and in consideration of the above scenarios, the Licence Holder requests that the volume of the raw sewage being treated, production of RO brine and disposal of blended effluent being disposed of to the irrigation area be reported as a daily average to ensure better compliance outcomes and/or reduce the likelihood of potential non-compliance. The Licence Holder requests amendment to the wording for the Kartajirri Camp WWTP to include the bold text: • Able to treat up to 385 m^3/day **cumulatively** of raw sewage • RO Brine Tank to cater for 225 m^3/day **cumulatively** of RO brine for mixing with treated effluent before co-disposal to the Irrigation Field • Disposal via irrigation must not exceed 610 m^3/day **cumulatively** of blended effluent. The Licence Holder requests amendment to the wording for the Eliwana Flying Fish Camp WWTP to include the bold text: • Able to treat up to 87.5 m^3/day **cumulatively** of raw sewage • RO Brine Tank to cater for 26.25 m^3/day **cumulatively** of RO brine for mixing with treated effluent before co-disposal to the Spray Field • Disposal via irrigation must not exceed 114 m^3/day **cumulatively** of blended effluent.	'cumulatively'. Instead, the department has added a Note 1 that stipulates that these limits can be 'averaged across a monthly period'.
Condition 3, Table 2 Maintenance facility / refuelling areas including	The Licence Holder requests for the removal of the wording specifying that the daily limit of 1,440 m^3 per day of oily water can be collected from maintenance workshops and washdown bays, in the event that there is a heavy or cyclonic rainfall event, whereby potentially contaminated water is to be collected and processed.	The department has removed this requirement to enable the Licence Holder operational flexibility. The Licence Holder should note that this requirement was transferred from W6779/2023/1 where it is listed as an operational requirement

Condition	Summary of Licence Holder's comment	Department's response
washdown bays and OWS facility for the NPI facility	The current wording is operationally limiting and does not best achieve the requirements of the Project. The Licence Holder seeks some operational flexibility in the collection of oily water and requests that the daily volume limit be removed.	for this infrastructure.
Condition 12	The Licence Holder has reviewed the existing wording and notes that the meaning is ambiguous and a potential source of non-compliance. Therefore, to ensure additional clarity in the interpretation of the condition, the Licence Holder has proposed changes to the wording of this condition as shown below. The licence holder must~~,~~ **ensure that** ~~where~~ the requirements for calibration **are** ~~cannot be practicably~~ met **where possible.**~~,~~ **If the** ~~or a discrepancy exists in the interpretation of the~~ requirements **for calibration cannot be practicably met**, ~~bring~~ these issues **are to be brought** to the attention of the CEO accompanied with a report comprising details of any modifications to the methods.	The department has removed this condition from the Licence. Noting that existing condition 11 (shown below), should ensure monitoring equipment is calibrated accordingly. *Condition 11 – The licence holder must ensure that all monitoring equipment used on the premises to comply with the conditions of this Licence is calibrated in accordance with the manufacturer's specifications.*
Condition 20	The Licence Holder has stated that on 16 May 2022, they received correspondence from the department stating that the Environmental Reporting requirements for the Eliwana Licence (listed in Schedule 2 of the notice) have been amended in accordance with sections 59(2), 59(1a) and 59(1)b of the EP Act. The rationale for the amendments to the reporting requirements was to reduce the administrative burden on licence holders and regulators for low and medium-risk industry licences. This was to align with the Streamline WA initiative. The Licence Holder wishes to clarify the following: • Environmental Report (AEMR) is required biennially. • Environmental Report (AACR) is required every year.	It is at the department's discretion and based on the complexity / monitoring requirements under the Licence as to whether the reporting frequency is updated from biennially to annual. The Licence Holder should note that L9221/2019/1 was amended on 30 March 2023 and 05 May 2024 both with annual reporting requirements for the Environmental Report. Notwithstanding the above and based on the existing monitoring requirements of the Licence, the department has updated condition 20 to read – The licence holder must: (a) prepare an Environmental Report that provides information in accordance with Table 7 for the preceding two annual periods; and (b) submit that Environmental Report to the CEO by 31 March 2024 and biennially

Condition	Summary of Licence Holder's comment	Department's response
		thereafter.
Figures 1, 2 and 5	The Licence Holder notes that tenements L47/1158 and L47/1159 are now forecasted to be granted in July 2026. Fortescue requests that these proposed tenements be excluded from the scope of this amendment. Figures 1, 2 and 5 updated to reflect the removal of L47/1158 and L47/1159 from the draft Licence.	Figures updated.
Figure 12	As above. Figures 12 updated to reflect the removal of L47/1158 and L47/1159 from the draft Licence.	The department notes that the new Figure 12 didn't just update the prescribed premises boundary with the removal of L47/1158 and L47/1159. Some of the future / proposed pits / waste dumps were also changed outside of what was originally assessed. The Licence Holder has stated that they updated Figure 12 of the draft licence to reflect the updated prescribed premises boundary. Additionally, they also updated the future waste dumps and pits to reflect the most current mine plan. The department has included the revised Figure 12 noting that the assessment (refer to section 2.2.5) for the inert waste disposal areas to reflect the updated 5-year mine plan is still applicable.