



Application for Licence Amendment

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

Licence Number	L9309/2021/1
Licence Holder	Butcherbird Operations Pty Ltd
ACN	684 395 748
File Number	APP-0030347
Premises	Butcherbird Manganese Project Mining Tenement M52/1074 MEEKATHARRA WA 6642
Date of Report	01 October 2025 (FINAL)
Decision	Revised licence granted

Table of Contents

1. Decision summary	1
2. Scope of assessment	1
2.1 Regulatory framework	1
2.2 Application summary	1
2.3 Risk assessment	2
3. Consultation	3
4. Conclusion	3
4.1 Summary of amendments.....	3
References	3

Table 1: Risk assessment of potential emissions and discharges from the Premises during operation.....	2
Table 2: Consultation	3
Table 3: Summary of licence amendments	3

1. Decision summary

Licence L9309/2021/1 is held by Butcherbird Operations Pty Ltd (Licence Holder) for the Butcherbird Manganese Project (the Premises), located at Mining Tenement M52/1074.

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 L9309/2021/1 has been granted.

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

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Application summary

On 31 July 2025, the Licence Holder submitted an application to the department to amend Licence L9309/2021/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). This amendment is limited only to changes to monitoring conditions in the licence related to Tailing Storage Facility (TSF) bores under Category 5 from the Existing Licence.

The amendment is for a reduction in frequency of monitoring as per Condition 2, Table 2 of the licence L9309/2021/1 during the period of care and maintenance (C&M) which commenced when operations were suspended in February 2024.

The monitoring of TSF bores has continued at the required frequency since the site went into C&M. The Licence Holder is requesting a change of frequency for all parameters under Condition 2 from monthly and quarterly respectively to annually whilst the Project remains on C&M.

The Licence Holder has proposed that monitoring frequency would return to current requirements when operations, including disposal of tails into the TSF recommence.

2.3 Risk assessment

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 2.2), 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 1.

The Revised Licence L9309/2021/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. storage of tailings.

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

Table 1: 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 for additional regulatory controls / DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation (including time-limited-operations operations)								
Storage of tailings in the TSF	Seepage from storage of tailings	Pathway: Seepage through embankment walls and base Impact: seepage resulting in a change in the groundwater chemistry and water level Impact: Localised surface expression of groundwater causing detrimental effects on native vegetation	Soils Native vegetation Groundwater	Refer to Section 2.2	C = Moderate L = Unlikely Medium Risk	N	<u>Condition 2 - Monitoring</u>	The Delegated Officer considers a reduced monitoring frequency during the C&M phase to be acceptable. However, the proposed annual schedule is not supported, as the TSF still contain tailings within them. To account for seasonal variability, the department has imposed a condition requiring biannual monitoring (twice yearly).

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

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

3. Consultation

Table 2 provides a summary of the consultation undertaken by the department.

Table 2: Consultation

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment on 24 September 2025	On 30 September 2025 the Licence Holder accepted the changes and requested the “finals” be sent through	N/A

4. 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.

4.1 Summary of amendments

Table 3 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 3: Summary of licence amendments

Condition no.	Proposed amendments
2, Table 2	Monitoring frequency for all parameters updated to bi-annually

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.