



## Application for Licence

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

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<b>Licence Number</b>	L9421/2023/1
<b>Applicant</b>	Newcam Minerals Pty Ltd
<b>ACN</b>	30 627 911 997
<b>File number</b>	DER2023/000751
<b>Premises</b>	Mt Gould Iron Ore Project Landor – Meekatharra Road PEAK HILL WA 6642 Legal description Mining Tenement M52/236 As defined by the Premises map in Figure 1
<b>Date of report</b>	20 May 2024
<b>Decision</b>	Licence granted

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## 1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the operation of the premises. As a result of this assessment, licence L9421/2023/1 has been granted.

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) 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 and overview of premises

On 20 November 2023, Newcam Minerals Pty Ltd (applicant) submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act).

The application is to seek a licence relating to the operation of a mobile crushing and screening plant to process iron ore up to 1.752 million tonnes per annum mined from the deposits at Mount Gould for the Mount Gould Iron Ore Project (the premises). The premises is approximately 144 km southeast of the Meekatharra township in the Goldfields region on mining tenement M52/236.

The premises was constructed under W6672/2021/1 and the applicant submitted their first Environmental Compliance Report on 25 August 2023 which was partially compliant, due to missing information of construction completion date and an authorized signature. A request for further information was sent on 19 October 2023 and full compliance of the Environmental Compliance Report was assessed on 18 December 2023.

The premises relates to the category 5 and assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which is defined in licence L9421/2023/1. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020a) are outlined in licence L9421/2023/1.

#### 2.2.1 Mobile crushing and screening plant

The mining campaign (Stage 1) will be 12 months, while Stage 2, approved under the Mining Act 1978 on 28 February 2024, will extend the life of mine (LOM) by a further 12 months, making the total LOM two years (24 months). The 3-stage crushing, and screening plant installed on the premises comprises of a primary jaw crusher, secondary cone crusher and horizontal screening plant. Ore from the scree deposits is loaded into haul trucks via front end loaders and delivered to a temporary run of mine (ROM) pad where it is fed into the mobile crushing and screening plant (Figure 1). Following the crushing and screening process, ore is segregated into lump and fines product and stored as stockpiles for loading onto trucks and transported approximately 680 km to the port of Geraldton for direct shipping export.

A flood diversion drain was constructed along the eastern side of the prescribed premises boundary. The diversion drain runs in a southeast direction; parallel to the hillslope and haul road, before turning southwest where it passes between the processing and stockpile areas. The diversion drain is designed as a permanent containment feature to intercept all-natural storm water runoff from the Mt Gould landform to the processing areas. Water from the flood diversion drain is directed to Turkeys Nest 1.

Bund diversion drains were installed around key infrastructure to intercept potentially contaminated runoff (sediment, hydrocarbons) from the processing area, ROM pad and ore stockpile areas (Figure 1). Runoff from bund diversion drains is to be directed into sediment basins and left to evaporate naturally within the basins.

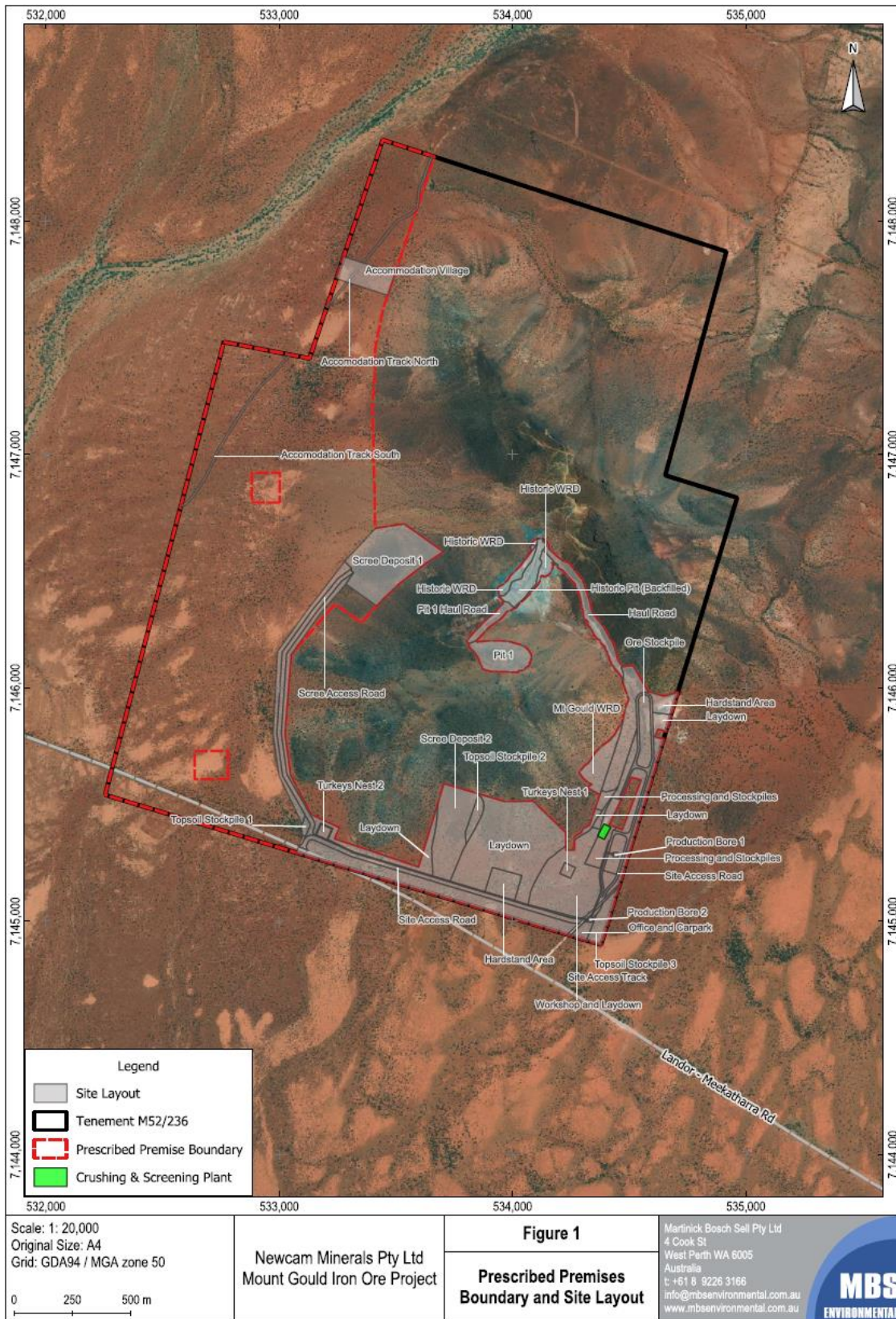


Figure 1 Site infrastructure layout

## 2.3 Native vegetation monitoring assessment review

### 2.3.1 Compliance with condition requirements

Condition 12 of works approval W6672/2021/1 specified that native vegetation health assessment monitoring was required to be undertaken within 500 metres from the crushing and screening area during time-limited operations (TLO). The following vegetation monitoring requirements were specified:

- Conduct three native vegetation monitoring plots (each 20m wide and 20m long) within the monitoring point specified, with at least one to the east and one to the west of the crushing and screening area;
- Photograph and record the vegetation condition within the three vegetation monitoring plots in accordance with the Keighery, B.J (1994) scale; and
- Situated outside of the approved clearing footprint issued under clearing permit CPS 9417/1.

The monitoring was specified due to concerns with dust emissions affecting the Remnant native vegetation that contains the Mount Gould vegetation complex (banded ironstone formation) (Priority 1) and priority flora species including *Halgania gustafsenii* var. *Murchison* (P1); *Tribulus Adelacanthus* (P3), *Rhodanthe sphaerocephala* (P1) and *Eremophila warnesii* (P1) all which occur within and adjacent to the Premises boundary.

The applicant engaged Emerge Associates to undertake the vegetation health assessment monitoring. Three surveys were undertaken including a baseline survey on 16 and 17 May 2023 and subsequent surveys on 29 August and 28 November 2023 during TLO. For each survey, three quadrats were established within 500 m from the crushing and screening area (Q1-Q3) (referred to as 'impact' samples) and three quadrats were established more than 500 m from the crushing and screening area as reference (control) samples (Q4-Q6) (Figure 1).

A Native Vegetation Monitoring report (Emerge Associates 2024) was submitted to the department on 16 March 2024 to meet compliance with condition 13 of works approval W6672/2021/1. A compliance assessment of the TLO report concluded that the applicant met the requirements of condition 12 and 13 of works approval W6672/2021/1.

### 2.3.2 Vegetation monitoring results

Overall, no decline in vegetation condition or vegetation health was recorded during the three surveys. Species diversity and vegetation cover decreased within both impact and reference monitoring quadrats, however this was attributed to seasonal variation.

#### Species diversity and vegetation health condition

Impact and reference quadrats recorded a decrease in species diversity and vegetation cover during the August and November monitoring events compared to the baseline (May) survey. The decrease in species diversity and cover was attributed to the higher-than-average rainfall experienced during March and April and subsequent response from annual species, in particular grasses. High understorey cover recorded in the May monitoring event was attributed to these annual species. The subsequent monitoring events were preceded by subsequent drying of the environment which resulted in the death of these annual species and a reduction in cover and species present.

#### Dust deposition

Dust was observed on plants within quadrats Q1 (August and November), Q2 (November) and Q4 (November). All individuals where dust was recorded were still alive and no visible dust was evident in Q3, Q5 or Q6 during any monitoring events. The dust within Q1 was attributed to the crushing and screening plant, due to the presence of the dust within the overstorey vegetation, and the appearance of the dust in having a darker, iridescent sheen. The dust

within Q2 was finer, red sandy dust and was interpreted to be from the road located within proximity to the quadrat.

In addition to the impact quadrats, dust was recorded within understorey species in reference quadrat Q4. Whilst there was no overstorey vegetation present in Q4, surrounding *Acacia* spp. did not display any evidence of dust disposition. Evidence of recent grazing by cattle within and surrounding the quadrats was present and so it is likely that dust is due to cattle rather than the crushing and screening infrastructure.

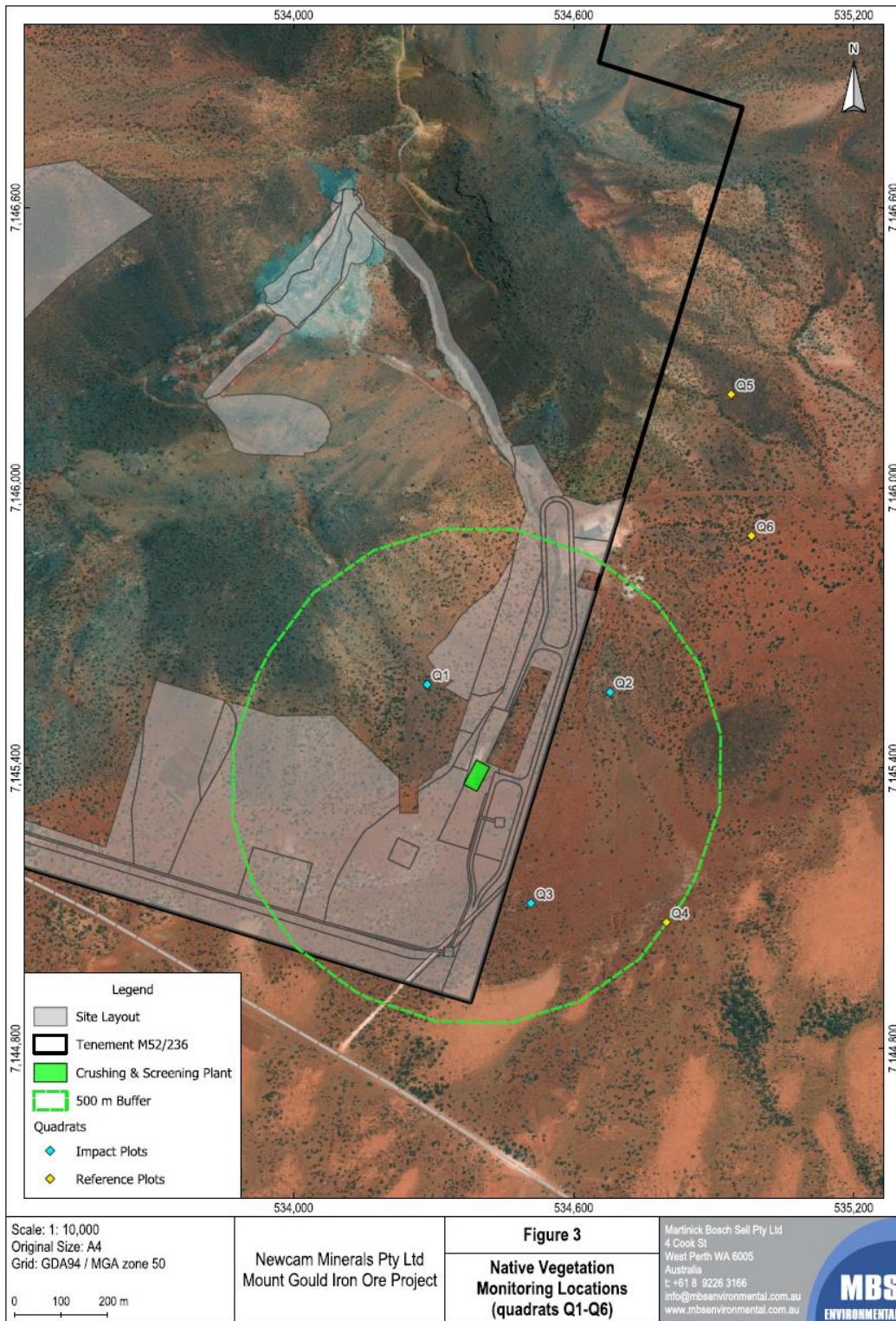


Figure 2 Vegetation monitoring plots

### 2.3.3 Technical review

The department referred the Native Vegetation Monitoring report to the Department of Biodiversity, Conservation and Attractions (DBCA) for comment. DBCA provided the following advice on 12 April 2024:

- It was noted that species diversity and vegetation cover decreased within quadrats located in the impact and reference quadrats, which the report attributed to seasonal variation. However, the time frame over which monitoring occurred is not considered sufficient to determine that the decline is seasonal, because there is no data in the subsequent season to demonstrate that condition returned to the previous percentage cover and species diversity during the next season.
- The monitoring report indicates that dust was observed on vegetation, which was attributed to the crushing and screening plant and the road located within proximity to one of the quadrats. The report states that despite the presence of the dust, there was no obvious detrimental effects on the vegetation, with all individuals alive and not showing signs of stress. However, the monitoring was undertaken at a time when the dust had been present for a very short period (less than 7 months) and there is potential that over a greater period the dust could lead to decline. There is also potential that the ongoing operational activities will result in a build up of dust on vegetation and secondary impacts in subsequent months may be greater than the impact during the first few months of operation.
- The information provided indicates that the activities which may lead to secondary impacts on the Priority 1 flora and community, such as crushing and screening were ongoing following the November monitoring. It is therefore not possible to determine if the operation is having indirect impact on the Mt Gould vegetation assemblages Priority Ecological Community (PEC).
- It is recommended that monitoring throughout the operational period of the project and the following season would be more useful to demonstrate that the Mount Gould Iron Project is not leading to vegetation decline resulting from secondary impacts.
- Quadrat monitoring data indicates that none of the quadrats surveyed contain the Priority 1 flora *Halgania gustufsenii* var. Murchison (see location of individual flora records in Figure 3). It is therefore not possible to determine if secondary impacts are leading to decline in health of this Priority 1 taxon.

DBCA provided further general advice regarding the species *Halgania gustufsenii* var. Murchison, which was nominated for listing as Threatened flora and therefore has potential to be protected as Threatened flora under the *Biodiversity Conservation Act 2016*. Threatened flora are routinely monitored to ensure that the populations are not declining, particularly where there are existing threats. DBCA understands that the applicant may be proposing further projects in this area and it may be a requirement for future approvals to demonstrate that existing projects are not having adverse impacts on the Biodiversity values of the area. DBCA therefore recommend that more rigorous monitoring over a longer period and inclusive of impacts on both the Mt Gould PEC and the Priority 1 *Halgania gustufsenii* var. Murchison would be useful in demonstrating whether secondary impacts on the flora and community are occurring.

**The Delegate Officer reviewed the information in this section and has found:**

- Species diversity and vegetation cover decreased within quadrats located in the impact and reference quadrats during vegetation monitoring during TLO. However, further monitoring is recommended to assess whether this can be attributed to seasonal variation
- Vegetation monitoring should continue throughout the operational period of the

project (expected to be an additional seven months post-TLO) and the following season to demonstrate that the Mount Gould Iron Project is not leading to vegetation decline within the Mt Gould PEC resulting from secondary impacts (e.g. from dust emissions associated with the crushing and screening plant)

- Priority 1 flora *Halgania gustufsenii* var. Murchison was not identified in any quadrats during the vegetation monitoring. However, it was not clarified in the Native Vegetation Monitoring report whether the presence of this species was specifically surveyed as part of the assessment.
- It appears that the majority of *Halgania gustufsenii* var. Murchison records occur outside of the 500 m buffer around the crushing and screening plant location (Figure 3).



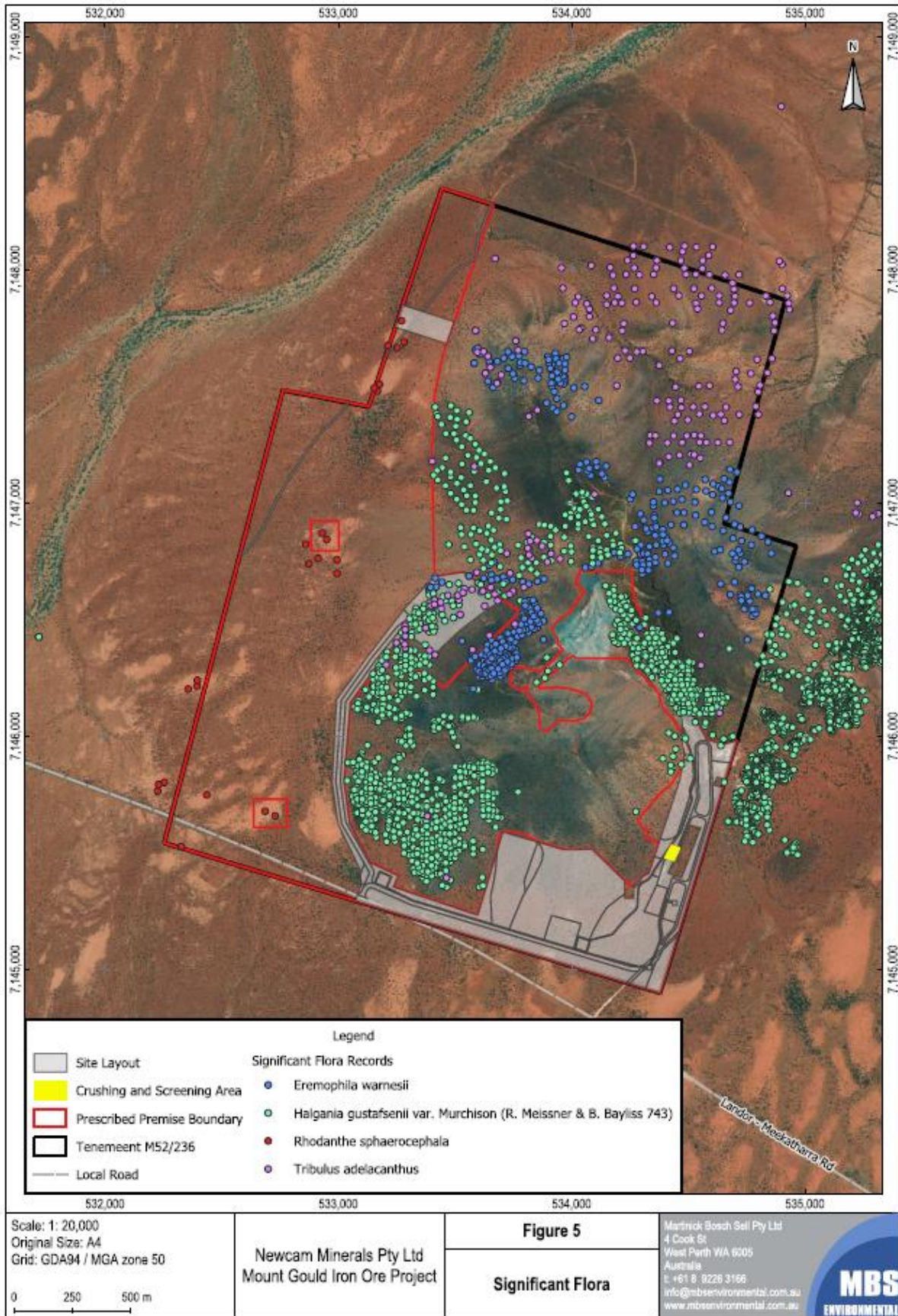


Figure 3 Significant flora in the vicinity of the crushing and screening operations

### 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 2020a).

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 decision report are detailed in Table 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

**Table 1: Proposed applicant controls**

Emission	Sources	Potential pathways	Proposed controls
<b>Operation</b>			
Dust	Dust generated during operations including crushing of material, vehicle movements, lift-off from stockpiles and/or stored product.	Air / windborne pathway	<ul style="list-style-type: none"> <li>Existing operational controls specified in W6672/2021/1.</li> <li>Exposed areas to be watered down with a water cart.</li> <li>Mobile crushing and screening plant fitted with fixed sprays.</li> <li>During high winds, crushing and screening activities are restricted.</li> </ul>
Noise	Crushing and screening of material	Air / windborne pathway	<ul style="list-style-type: none"> <li>All vehicles and plant equipment will be regularly maintained.</li> <li>Engines and generators will incorporate sound attenuating measures.</li> </ul>
Hydrocarbon spills or leaks	Vehicle and equipment use, refueling or maintenance activities.  Chemicals used and stored onsite.	Seepage to soil and groundwater	<ul style="list-style-type: none"> <li>Existing operational controls specified in W6672/2021/1.</li> <li>Ore processing does not use any reagents and raw water used for processing is of reasonable quality.</li> <li>Hydrocarbons for the project are of moderate volumes and are stored in accordance with AS 1940, AS 3833 or AS 3780 and the <i>Dangerous Goods Safety Act, 2004 (WA)</i>.</li> </ul>
Sediment laden stormwater	Overland and stockpile runoff	High rainfall events	<ul style="list-style-type: none"> <li>Existing operational controls specified in W6672/2021/1.</li> <li>Bund diversion drains have been constructed to direct runoff from stockpiles</li> </ul>

Emission	Sources	Potential pathways	Proposed controls
			<p>and ROM Pad within the crushing and screening and screening area to sediment basins, during extreme weather events.</p> <ul style="list-style-type: none"> <li>Flood diversion drain has been constructed to collect all-natural storm water runoff from the Mt Gould landform.</li> <li>Stockpiles located away from stormwater flows to minimise the potential losses through sedimentation runoff.</li> <li>Hazardous materials will be stored and handled in accordance with AS 1940, AS 3833 or AS 3780 and the <i>Dangerous Goods Safety Act, 2004 (WA)</i>.</li> </ul>

### 3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment (DWER 2020a)*, the Delegated Officer has excluded the applicant’s employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Table 2 below provides a summary of environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental Siting (DWER 2020b)*).

**Table 2: Sensitive environmental receptors and distance from prescribed activity**

Human receptors	Distance from prescribed activity
Mt Gould Homestead	<p>Approximately 5km east of prescribed premises (approximately 2 residents in the area)</p> <p>Screened out due to separation distance</p>
Mt Gould lockup (Historical Site)	<p>Approximately 1km from prescribed premises and 3km west of the crushing and screening plant</p> <p>Tourist site / Infrequent visitation of visitors</p> <p>Screened out due to short term use of site – no overnight stay</p>
Environmental receptors	Distance from prescribed activity
<p>Conservation significant flora, including:</p> <ul style="list-style-type: none"> <li>Priority Ecological Community (PEC) - The Mount Gould vegetation complex (banded ironstone formation) (Priority 1) ecological community</li> <li>Priority Flora Species</li> </ul>	<p>PEC is mapped over approximately 222 ha of the Prescribed Premises boundary.</p> <p>3 priority flora species have been recorded (DBCA Database) within the Prescribed Premises boundary:</p> <ul style="list-style-type: none"> <li><i>Halgania gustafsenii</i> var. <i>Murchison</i> (P1) 140m north of the mobile crushing and screening plant</li> <li><i>Tribulus Adelacanthus</i> (P3)</li> <li><i>Rhodanthe sphaerocephala</i> (P1).</li> </ul> <p><i>Eremophila warnesii</i> (P1) was also recorded within the Prescribed Premises boundary during a flora survey undertaken by Woodman Environmental Consulting in 2012.</p>

<p>Remnant Native Vegetation</p>	<ul style="list-style-type: none"> <li>The boundary of the Prescribed Premises boundary comprises of approximately 136.5ha of remnant native vegetation.</li> <li>Remnant vegetation also adjoins the boundary of the Prescribed s. Premise</li> </ul> <p>Applicant has clearing permit CPS 9417/1 up to 95.6 ha of native vegetation can be cleared</p>
<p>Conservation significant fauna</p>	<p>The Peregrine Falcon (<i>Falco peregrinus</i>) listed as ‘Other Specially Protected Fauna’ under the <i>Biodiversity Conservation Act 2016</i> has been recorded within the boundary of the Prescribed Premises boundary.</p> <p>Biologic Consulting in 2012 identified seven fauna habitats within the Prescribed Premises boundary. Of the habitats recorded, two habitats namely the ‘Spinifex Hummock Grasslands’ and ‘Breakaway System’ which are restricted to Mount Gould and considered to be locally significant provide habitat for the following fauna species:</p> <ul style="list-style-type: none"> <li>Peregrine Falcon (<i>Falco peregrinus</i>); - <b>conservation significant</b> – recorded within the boundary of the Prescribed Premises</li> <li>Painted Finch (<i>Emblema pictum</i>) – Locally significant</li> <li>Rainbow Bee-eater (<i>Merops ornatus</i>) – <b>conservation significant</b> – recorded within the boundary of the Prescribed Premises- listed as marine under the <i>Environmental Protection and Biodiversity Conservation Act 1999</i></li> <li>Woolley's Pseudantechinus (<i>Pseudantechinus woolleyae</i>) – Locally significant</li> <li>Little Woodswallow (<i>Artamus minor</i>) (Habitat 7) - Locally Significant</li> <li>Little Broad-nosed Bat (<i>Scotorepens greyii</i>) – locally significant and limited range.</li> </ul>
<p>Surface Waterbodies</p>	<p>The Prescribed Premises is located within the Murchison River Catchment Basin.</p> <p>Two minor ephemeral watercourses known as ‘Gould Creek’ and ‘Bedaburra Creek’ are located approximately 2.9km west and 3km east of the crushing and screening plant respectively. Both surface waterbodies are tributaries of the Murchison River which is a major watercourse located 12km south of the boundary of the Premises.</p> <p>The Prescribed Premises sits on an escarpment with a high topographic relief of between 400m to 620m which promotes surface water runoff to flow downslope to the wash plain below and nearby creek lines eventually converging with the Murchison River.</p>
<p>Groundwater</p>	<p>The Premises is located within the Proclaimed East Murchison Groundwater Area under the <i>Rights in Water and Irrigation Act 1914</i>.</p> <p>Groundwater levels across the site range from 368 mAHD to 390 mAHD with groundwater flow direction mimicking the topography of the land in a north to south direction.</p> <p>Groundwater quality ranges from brackish to saline with TDS levels ranging from 2100 to 28 000 mg/L.</p>

<p>Aboriginal Sites and Heritage Places</p>	<p>The boundary of the Prescribed Premises falls within the Wajarri Yamatji (Part A) Native Title Claim area (WAD6033/1998). Native title was initiated on the site on 29 July 2021. The applicant has committed to maintaining ongoing stakeholder consultation with the Wajarri Yamatji Native Title Claimant Group as determined under the Native Title Act 1993 (NT Act), in regard to mine development and closure, to ensure that mining operations do not disturb Site No. 7450.</p> <p>One Aboriginal Site of Significance known as 'Mt Gould' (Site No. 7450) is recorded over the majority of the Prescribed Premises as a 5km area. The actual location of the site within the cultural area isn't shown due to cultural sensitivity of the site.</p> <p>Two site-specific Aboriginal Heritage assessments were undertaken over the Project tenement and identified seven places within the Project Tenement (DPLH 2023) that have been lodged with DPLH and not yet been assessed as Registered Sites. These sites have been demarcated in the field to ensure avoidance.</p>
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## 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020a) for each identified emission source and considers potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant 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 applicant'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 applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

Licence L9421/2023/1 that accompanies this decision report authorises emissions associated with the operation of the premises i.e. Category 5 usage of mobile crushing and screening plant for processing of iron ore.

The conditions in the issued licence, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

**Table 3: Risk assessment of potential emissions and discharges from the premises during operation**

Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
<p>Operation of the crushing and screening plant</p> <p>Unloading, loading, and stockpiling of material onto ROM pad during ore processing</p> <p>Vehicle movements on unsealed surfaces</p>	<p>Dust generated from crushing and screening, stockpiles, vehicle movements</p>	<p><b>Pathway:</b> Air/windborne dispersion</p> <p><b>Impact:</b> Impacts to adjacent remnant vegetation health through dust deposition smothering vegetation</p>	<p>Remnant native vegetation including significant flora</p>	<p>Refer to Section 3.1</p>	<p>C = Moderate L = Possible <b>Medium Risk</b></p>	<p>Y</p>	<p>Condition 1 (Table 1) Infrastructure and equipment requirements for crushing and screening plant during operations.</p> <p><b><u>Condition 2 (Table 2) – Quarterly vegetation monitoring</u></b></p> <p><b><u>Condition 3 – Reporting of data collected from implementing condition 2, including results and analysis of vegetation monitoring</u></b></p>	<p>The Delegated Officer considers that the licence holder controls are sufficient to mitigate potential dust emissions from the crushing and screening plant, ore loading and stockpiling operations, and vehicle movements within the premises.</p> <p>The most significant potential source of dust is the crushing and screening plant. Following review of the native vegetation health monitoring results during TLO and in consideration of advice from DBCA, including the significance of the Mt Gould PEC and flora in the vicinity of the operations, the Delegated Officer considers that vegetation monitoring should be continued for at least one more annual period to determine whether seasonal variation can account for the decline in species diversity and vegetation cover reported during vegetation monitoring during TLO. The assessment and reporting is to include an assessment on changes to <i>Halgania gustafsenii</i> var. Murchison given its conservation significance. However, vegetation monitoring beyond the vicinity of the crushing and screening plant is not considered necessary, given</p>

Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								<p>this assessment is limited to dust generated from the primary activities assessed under Part V, Division 3 of the EP Act.</p> <p>The additional monitoring data will inform the department on whether further monitoring is required in relation to potential impacts from the assessed activities (primarily crushing and screening).</p> <p>The Delegated Officer has also considered the proposed lifespan of crushing and screening operations being about seven months.</p> <p>Further, the Delegated Officer notes that additional monitoring may be required under future approvals, depending on the location and scale of any proposed activities.</p>
	Noise	<p><b>Pathway:</b> Air/windborne dispersion</p> <p><b>Impact:</b> Impacts to health of threatened fauna species that utilize the area resulting in displacement from their habitat and behavioral changes</p>	Conservation significant and locally significant fauna species that are known to occur within and adjacent to the Premises boundary.	Refer to Section 3.1	<p>C = Minor L = Possible <b>Medium Risk</b></p>	Y	Condition 1 (Table 1) Infrastructure and equipment requirements for crushing and screening plant during operations.	<p>N/A</p> <p>The Delegated Officer considers that the controls proposed by the Applicant including the maintenance of plant equipment in accordance with manufacturers requirements to ensure efficient operation and the plant design to be compliant with Australian Standard Noise Criteria are expected to be sufficient to attenuate any potential noise emissions from the crushing and screening operation to</p>



Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								local fauna that may utilize the native vegetation adjacent to the Prescribed Premises boundary.
	Sediment-laden or potentially contaminated stormwater	<b>Pathway:</b> Overland and stockpile runoff during high rainfall events. <b>Impact:</b> disturbance or impacting surface water quality and vegetation	Remnant native vegetation that contains the Mount Gould vegetation complex (banded ironstone formation) (Priority 1) ecological community is located within and adjacent to the Premises boundary.  Four priority flora species within and adjacent to the Premises boundary.	Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	Condition 1 (Table 1) Infrastructure and equipment requirements for crushing and screening plant during operations.	N/A
	Spillage, leakage and seepage of hydrocarbons and chemicals used and stored onsite.	<b>Pathway:</b> Overland flow following a spill or leak event <b>Impact:</b> Contamination of soils and deterioration of groundwater quality	Minor ephemeral tributaries located 70m west	Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	Condition 1 (Table 1) Infrastructure and equipment requirements for crushing and screening plant during operations.	N/A  The Delegated Officer has determined that the likelihood of surface water contamination is unlikely based on the Applicant's proposed controls. Therefore, the Delegated Officer considers the likelihood of this risk event to be unlikely.  Unintended discharge of hydrocarbons and other harmful materials into the environment is regulated under the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> .

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.

## 4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

**Table 4: Consultation**

Consultation method	Comments received	Department response
Application advertised on the department's website on 5 February 2024	None	N/A
Local Government Authority advised of proposal on 07 February 2024	None	N/A
Department of Mines, Industry Regulation and Safety (DMIRS) advised of proposal on 6 February 2024	<p>DEMIRS confirms that a Mining Proposal and Mine Closure Plan is currently under assessment within the tenement M52/236.</p> <p>The assessing officer considers the proposed activities of processing ore as stated within the Mining Proposal are aligned with the licence application.</p>	Noted.
Department of Biodiversity, Conservation and Attractions (DBCA) advised of the proposal on 4 April 2024	DBCA provided a response on 12 April 2024. See details in section 2.3.3.	DBCA comments were taken into consideration in the risk assessment.
Wajarri Yamaji Aboriginal Corporation (WYAC) advised of proposal on 6 February 2024.	<p>The following comments were received on 21 March 2024:</p> <p>The Ngoonooru Wajarri people, represented by the Ngoonooru Wajarri Land Group of the Wajarri Yamatji Native Title Party, object to the granting of licence L9421/2023/1. The area that forms mining lease M52/236-I, in its entirety, holds both tangible and intangible cultural heritage values to the Ngoonooru Wajarri people.</p> <p>In addition to the Registered and Lodged Heritage Sites identified in the application documents, the Ngoonooru Wajarri advise there are other "Aboriginal Sites" and "Heritage Places" within the vicinity</p>	<p>The department can only consider known Registered and Lodged Aboriginal Heritage Places in its assessment. The proposed activities are not considered to pose direct impacts (e.g. clearing, disturbance) to these sites, however there is potential for indirect impacts from the deposition of dust. Impacts of dust deposition were assessed in Section 3.2, in addition to potential adverse impacts to native vegetation in the vicinity of the crushing and screening plant.</p> <p>Dust mitigation controls, including operational and infrastructure controls, have been specified on the licence. The Delegated Officer considers the implementation of these controls to be sufficient to reduce the risk of potential impacts from the generation of dust on</p>

	<p>of the proposed works that will likely be impacted by the granting of this licence.</p>	<p>any heritage sites in the vicinity of the proposed activities to an acceptable level.</p> <p>Although no specific information was provided to the department regarding other “Aboriginal Sites” or “Heritage Places” potentially located at the premises, the department considers that the proposed activities will pose no impact to any additional sites will the implementation of the specified controls.</p> <p>The Delegated Officer further notes that is the responsibility of the applicant to seek approvals and manage potential impacts to aboriginal cultural heritage in accordance with the <i>Aboriginal Heritage Act 1972</i>.</p>
<p>The following additional comments were received on 15 April 2024:</p>		
	<p>Mt Gould and its surrounding area remain an important and extremely significant part of our Country. We, the Ngoonooru people, maintain a continued connection with the area with significant traditional familial water holes and camping places in close proximity. We believe these places will also be at risk of being detrimentally affected by the proposed crushing and screening works. We drink the water from these locations. We collect food and medicines from these areas. We do cultural activities in these areas.</p>	<p>Potential impacts to surface water quality (and therefore potential drinking water sources) and native vegetation (potential food sources) have been considered in the risk assessment (see Section 3.2).</p> <p>No specific information was provided on camping places to be considered in the assessment, however it is presumed that these would be located outside of the premises boundary.</p> <p>It is advised that should any impacts to these water and food sources be identified, a complaint should be reported to the department’s Pollution Watch (<a href="https://www.wa.gov.au/service/environment/pollutant-prevention/pollution-watch-or-1300-784-782">https://www.wa.gov.au/service/environment/pollutant-prevention/pollution-watch-or-1300-784-782</a>) for further investigation.</p>
	<p>The proposed works are considered to pose risk to impacting on our heritage and our Native Title rights. The impacts to Mt Gould and its surrounds will have impact to water flow, and this has devastating affects to our landscape. Changes to water flow can cause extreme erosion which subsequently impacts the vegetation and wildlife.</p>	<p>Potential changes to surface hydrology and drainage, and resulting impacts to vegetation, are regulated by DEMIRS under the <i>Mining Act 1978</i> and therefore not within the scope of this assessment. As noted above, a Mining Proposal and Mine Closure Plan is currently under assessment for the tenement M52/236.</p>
	<p>Dust from the proposed works can also cause devastating effects on remnant vegetation and stunt growth of new vegetation essential to local eco-systems. These risks will impact our ability to collect water, food and traditional medicine.</p>	<p>The potential indirect impact of dust generated by the proposed activities on vegetation has been assessed in this report (See Sections 2.3.3 and 3.2). Technical advice received from DBCA was considered in the assessment. Additional regulatory controls were consequently specifies in the licence,</p>

		including continued vegetation monitoring for a one-year period.
	The Ngoonooru Wajarri people are currently negotiating a Carbon Farming agreement, which includes the area of and adjoining the Mt Gould mine site – Mt Gould Station. The proposed works risk impacting the viability of the Carbon Farming agreement if adverse environmental effects occur from the proposed works. This has potential to cause financial loss to the Ngoonooru people if such adverse environmental impacts are allowed to occur.	Although the exact location of the Carbon Farm was not provided, the Delegated Officer considers the potential for impact to vegetation within the project area to be low given separation distance (>200 m), relatively short term (~seven months) operation of the crushing and screening plant and dust mitigation controls specified in the licence.
	It is noted by the Ngoonooru Wajarri Land Committee, that no dialogue has occurred with the proponent Newcam Minerals Pty Ltd in this matter or to the management cultural heritage. We further note that no application for a Section 18 under the <i>Aboriginal Heritage Act 1972</i> has either been applied for and negotiated with us as the Native Title Holders.	Approvals required under the <i>Aboriginal Heritage Act 1972</i> (AH Act) are regulated by DPLH through a separate approvals framework. These matters are therefore outside the scope of this assessment. The granting of the licence amendment does not remove the obligation which Newcam Minerals Pty Ltd has under the Aboriginal Heritage laws.

## 5. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

## References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020a, *Guideline: Risk Assessments*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020b, *Guideline: Environmental Siting*, Perth, Western Australia.
4. Emerge Associates 2024, *Native Vegetation Monitoring - Mount Gould Iron Project* - Project No: EP23-037(01). Prepared for Newcam Minerals March 2024

## Appendix 1: Summary of applicant's comments on risk assessment and draft conditions

Condition	Summary of applicant's comment	Department's response
Condition 1, Table 1, Item 1	<p>Request to change "site" to "nearest" weather station. The closest Bureau of Meteorology (BoM) station in Meekatharra provides accurate weather readings that are relevant and reflective of the mine site.</p> <p>Suggest removal of item "(iii)" of operational requirement "d)". Application of dust suppression agents is deemed unnecessary given the small volume of stockpiles and previous success using water carts for dust suppression during the Time Limited Operations (TLO) phase.</p> <p>Suggest amendment of operational requirement "e)" to reflect the proposed removal of item "(iii)" or application of dust suppression agents".</p> <p>Request to amend Figure 1 of Schedule 1 to reflect slight change to Crushing and Screening Plant location. Location surrounding the Crushing and Screening Plant has been relabelled "Processing and Stockpiles". Another label has been amended to "Ore Stockpile" from "Low Grade Ore Stockpile". This subsequently resulted in updating Figure 2 and 3 with the same amendments. Amended Figure 1, Figure 2, and Figure 3 has been sent through as an attachment.</p>	<p>Accepted request to amend meteorological reference site.</p> <p>The Delegated Officer agrees to the removal of Table 1 (d) item (iii) 'application of dust suppression agents'. The other methods are considered sufficient in managing dust emissions.</p> <p>Administrative changes to the figures and labels have been changed to reflect the new location of the crushing and screening plant.</p>
Condition 1, Table 1, Item 3	<p>Request to reduce the frequency of sediment basin inspections under operational requirement "c)" as weekly inspections for an area that receives little rainfall is considered excessive. In 2023, Meekatharra Airport Weather Station (007405) recorded only five days of significant rainfall (&gt;10 mm). Suggested inspection of sediment basins be incorporated into routine area inspections and following significant rainfall (&gt;10 mm in 24 hours).</p> <p>Request to amend Figure 2 of Schedule 1 to reflect minor changes to the bund diversion drain runoff directions shown in the Stormwater Management Infrastructure Map. Amended Figure 2 has been sent through as an attachment.</p>	<p>The Delegated Officer agrees with the proposed amendment to sediment basin inspection frequency.</p> <p>Figure 2 will be amended to reflect the changes to the bund diversion drain.</p>
Condition 1, Table 1, Item 4	<p>Suggest removing specific kL and type requirements for water carts. The proposed changes maintain the intent of the condition and allows more flexibility around the use of water carts that are a slightly different size or type (e.g. 100 kL capacity instead of 90 kL, road train versus single tank).</p>	<p>The Delegated Officer agrees to revise the condition and has removed the requirements for specific kL in water carts.</p>