



Application for Works Approval

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

Works Approval Number W2941/2025/1

Applicant Wonmunna Iron Ore Pty Ltd

ACN 169 151 777

File number APP-0028469

Premises Wonmunna Iron Ore Mine
Great Northern Highway, Shire of East Pilbara
Mining Tenement M47/1423 and M47/1424
NEWMAN WA 6753

Date of report 14 August 2025

Decision Works approval granted

Adam Green
A/MANAGER, WASTE INDUSTRIES
an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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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 construction and of the premises. As a result of this assessment, works approval W2941/2025/1 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 9 April 2025, the applicant submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act).

The application is to undertake construction works relating to putrescible landfill areas within Mining Tenements M47/1423 and M47/1424. Wonmunna Iron Ore Pty Ltd (the applicant) currently holds Licence L9411/2023/1, which authorises activities associated with prescribed premises Categories 5 (ore processing) and 54 (sewage) within Mining Tenement M47/1424. The premises is approximately 68 km north-west of Town of Newman.

Up until now, waste generated at the Wonmunna Iron Ore Project is transported off-site for disposal. As the project expands with the development of a new pit and potential future growth, the applicant is now seeking approval to construct and operate putrescible landfill areas within the existing waste rock landforms (WRL) and mined-out pits.

The proposed activities include the development of five landfill areas: one located within the existing northeast WRL, one within the central WRL, and three situated within the northeast pit areas designated as NE4, NE6, and NE7 (refer to figure 1). The total volume available for landfilling across the proposed areas is approximately 328,500 m³. This estimate is based on a conceptual maximum of 73 landfill cells, each with a volume not exceeding 4,500 m³ (dimensions: 30 m x 30 m x 5 m).

The estimated number of landfill cells that can be constructed within each designated area is as follows:

- Northeast WRL: 27 cells
- Central WRL: 15 cells
- NE4 Pit: 18 cells
- NE6 Pit: 6 cells
- NE7 Pit: 7 cells

The proposed landfill areas are designated to accept the following waste types: Inert Waste Type 2 (tyres), Inert Waste Types 1 and 2 (plastics), Putrescible Waste, Clean Fill, and Special Waste Type 1. The annual acceptance limit for Inert Waste Type 2 (tyres) is approximately 1,752 tonnes, while the combined limit for all other waste types is approximately 1,476 tonnes per annum.

The premises relates to the category and assessed design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in works approval W2941/2025/1. 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 2020) are outlined in works approval W2941/2025/1.

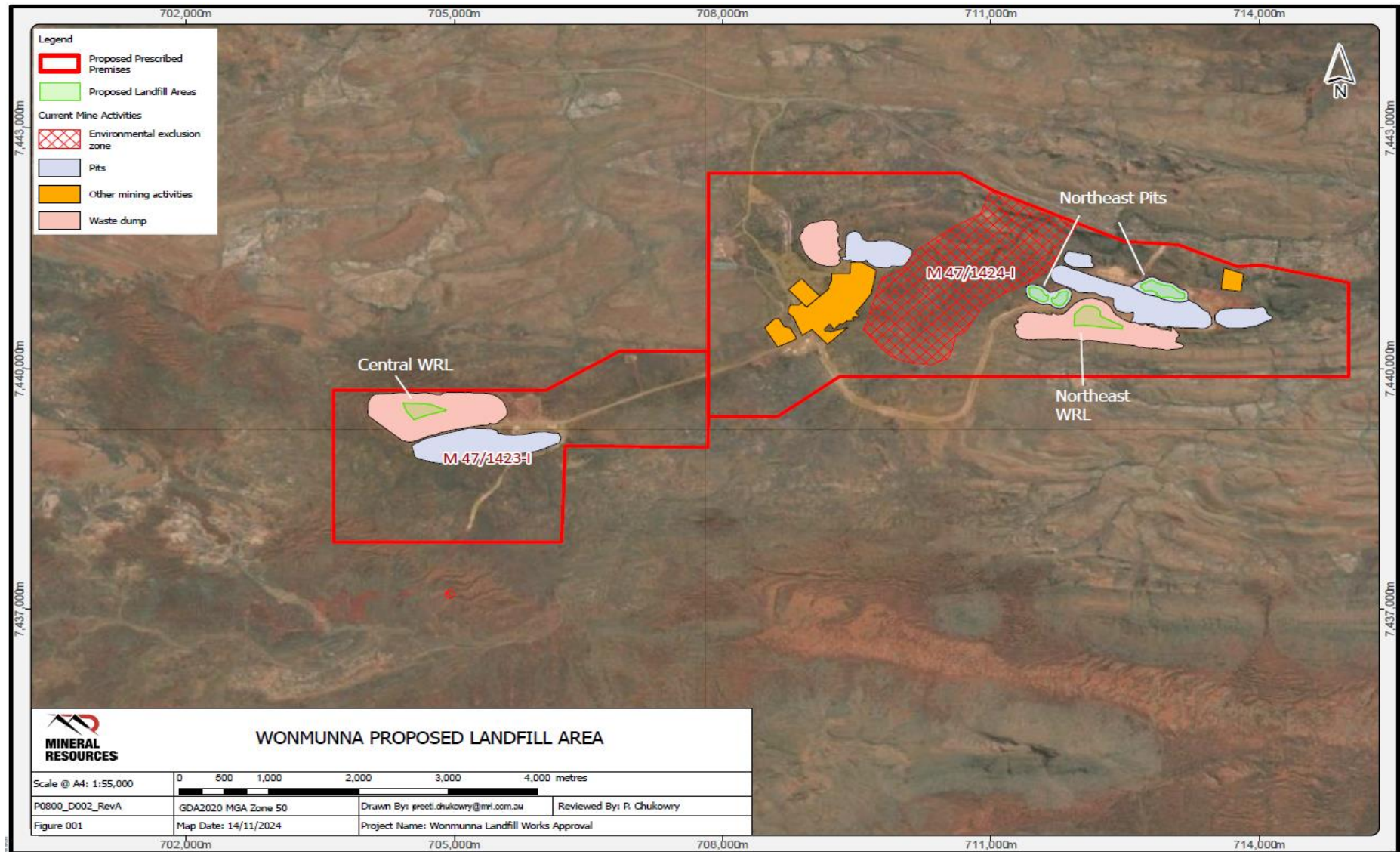


Figure 1: Proposed landfill areas

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3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

To establish a risk event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this 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
Construction			
Dust	Construction of 5 landfill areas within Mining tenements M47/1423 and M47/1424.	Air / windborne pathway	Dust will be managed in accordance with the Wonmunna Iron Ore Project Dust and Fibrous Materials Management Plan, including: <ul style="list-style-type: none">The use of water carts on dust generating areasTrafficable areas will be maintained in a condition that will minimise the generation or emission of windblown or traffic generated dustRestricting traffic to most direct route on the site and prohibiting traffic on non-active areasSpeed limits on facility access roads
Noise		Air / windborne pathway	<ul style="list-style-type: none">Speed limits on facility access roads.Restricting traffic to most direct route on the site and prohibiting traffic on non-active areas.
Operation			
Dust	Disposal of clean fill, inert waste type 1 and 2, putrescible waste and special waste type 1 to landfill cells	Air / windborne pathway	Dust will be managed in accordance with the Wonmunna Iron Ore Project Dust and Fibrous Materials Management Plan, including: <ul style="list-style-type: none">The use of water carts on dust generating areasTrafficable areas will be maintained in a condition that will minimise the generation or emission of windblown or traffic generated dustRestricting traffic to most direct route on the site and prohibiting traffic on non-active areasSpeed limits on facility access roads

Emission	Sources	Potential pathways	Proposed controls
Noise		Air / windborne pathway	<ul style="list-style-type: none"> Speed limits on facility access roads. Restricting traffic to most direct route on the site and prohibiting traffic on non-active areas.
Odour		Air / windborne pathway	<ul style="list-style-type: none"> Covering of waste weekly with enough inert material such that no waste is exposed. No waste will be stored temporarily or landfilled within 35 m of the proposed Prescribed Premises boundary.
Windblown waste		Air / windborne pathway	<ul style="list-style-type: none"> No waste will be stored temporarily or landfilled within 35 m of the proposed Prescribed Premises boundary. Waste will be covered weekly or as soon as practicable after deposit and before compaction Wind-blown waste will be collected and returned to the tipping area regularly Fencing or an equivalent barrier will be installed around active putrescible landfilling areas
Leachate		Seepage to ground	Landfill cells will be within existing mining landforms, with at least 2 m distance to the highest groundwater level, and no interaction with natural surface water bodies
Firewater		Overland runoff	<ul style="list-style-type: none"> The separation distance between the landfill and any natural surface water body will not be less than 100 m Tyres are landfilled in cells within existing mining landforms, with at least 2m distance to the highest groundwater level, and no interaction with surface water bodies.
Contaminated stormwater		Seepage to ground	
Landfill gas		Air / windborne pathway	None proposed.
Fire		Air / windborne pathway	<ul style="list-style-type: none"> Tyres are inert waste, and will not be cut, shredded or modified in any way, to minimise the risk of exposure and/ or breakdown of their internal components. Tyres to be landfilled in accordance with Part 6 of the <i>Environmental Protection Regulations 1987</i> and the additional requirements for the acceptance and landfilling of controlled waste (tyres) set out in the <i>Environmental Protection (Controlled Waste) Regulations 2004</i>. Tyres are landfilled in cells within existing mining landforms, with at least 2m distance to the highest

Emission	Sources	Potential pathways	Proposed controls
			groundwater level, and no interaction with surface water bodies.
Pest and vermin		Air / windborne pathway	<ul style="list-style-type: none"> Waste will be covered weekly or as soon as practicable after deposit and before compaction Wind-blown waste will be collected and returned to the tipping area regularly

3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), 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 and Figure 2 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 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Nil	
Environmental receptors	Distance from prescribed activity
Threatened fauna	<p>The following fauna species recorded within the Mining tenements M47/1423 and M47/1424.</p> <ul style="list-style-type: none"> Priority 2 - unpatterned robust slider (Robertson Range) Priority 4 - western pebble-mound mouse, ngadji
Minor surface water lines	Minor water lines flow across the premises
Proclaimed <i>Right in Irrigation and Water Act 1914</i> area	Premises located within proclaimed groundwater and surface water areas
Groundwater	Groundwater level is between 40 and 60 mbgl
Cultural receptors	Distance from prescribed activity
Aboriginal heritage site	Weeli Wolli Bridge South - ACH-00006348 – approximately 280 m south of the premises boundary

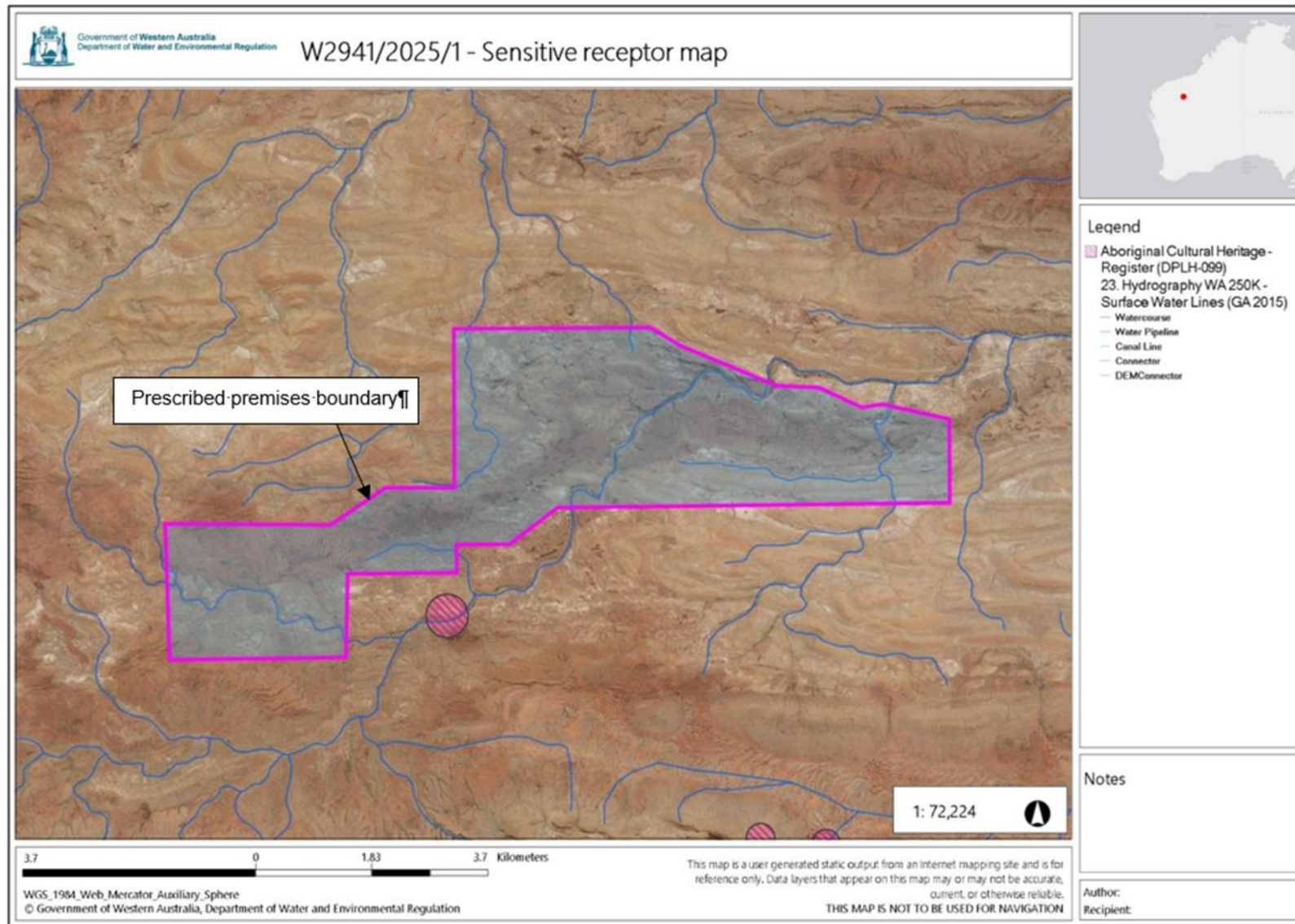


Figure 2: Distance to sensitive receptors

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3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account 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 works approval 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.

Works approval W2941/2025/1 that accompanies this decision report authorises construction. The conditions in the issued works approval, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required to authorise emissions associated with the ongoing operation of the premises. A risk assessment for the operational phase has been included in this decision report, however licence conditions will not be finalised until the department assesses the licence application.

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

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Construction								
Construction of 5 landfill areas within Mining tenements M47/1423 and M47/1424.	Dust	Air / windborne pathway causing impacts to health and amenity	Threatened fauna species	Refer to Section 3.1	C = Slight L = Rare Low Risk	Y	Condition 4	Emission to be regulated under the general provisions of the EP Act
	Noise			Refer to Section 3.1	C = Slight L = Rare Low Risk	Y	Condition 4	Emission to be regulated under the <i>Environmental Protection (Noise) Regulations 1997</i>
Operation								
Disposal of clean fill, inert waste type 1 and 2, putrescible waste and special waste type 1 to landfill cells	Dust	Air / windborne pathway causing impacts to health and amenity	Threatened fauna species	Refer to Section 3.1	C = Slight L = Rare Low Risk	Y	Condition 1	Emission to be regulated under the general provisions of the EP Act
	Noise	Air / windborne pathway causing impacts to health and amenity		Refer to Section 3.1	C = Slight L = Rare Low Risk	Y	Condition 1	Emission to be regulated under the <i>Environmental Protection (Noise) Regulations 1997</i>
	Odour	Air / windborne pathway causing impacts to health and amenity		Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	Condition 1 and 4	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating odour emissions

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Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
	Windblown waste	Air / windborne pathway causing impacts to health and amenity		Refer to Section 3.1	C = Slight L = Possible Low Risk	Y	Condition 1 and 4	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating risk of windblown waste
	Leachate	Seepage to groundwater	Proclaimed RIWI groundwater and surface water areas watercourses	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 1 and 4	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating emissions of leachate, firewater and contaminated stormwater.
	Firewater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality		Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 1 and 4	
	Contaminated stormwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality		Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 1 and 4	
	Landfill gas	Air / windborne pathway causing impacts to health and amenity		Refer to Section 3.1	C = Major L = Unlikely Medium Risk	Y	Condition 4	Due to the relatively low annual throughput of waste, the delegated officer determined that any landfill gas generated within the cells will passively vent.

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
	Fire	Air / windborne pathway causing impacts to health and amenity	premises boundary	Refer to Section 3.1	C = Major L = Unlikely Medium Risk	Y	Condition 1 and 4	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating fire related emissions
	Pest and vermin	Air / windborne pathway causing impacts to health and amenity		Refer to Section 3.1	C = Slight L = Possible Low Risk	Y	Condition 1 and 4	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating risk of pest and vermin.

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

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 16 May 2025	None received	N/A
Local Government Authority advised of proposal on 9 June 2025	None received	N/A
Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) advised of proposal 5 June 2025	<p>On 5 June 2025, the Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) advised that the Mining Proposal (MP), Registration ID 500477, submitted by Wonmunna Iron Ore Pty Ltd on 10 April 2025, is currently under assessment.</p> <p>DEMIRS confirmed that the proposal includes the expansion of existing approved mining voids and the establishment of landfill areas within existing waste rock landforms and pit footprints. The proposed landfill sites are located within mining voids already approved for above-water-table mining—specifically North Marra Mamba East pits 4, 6, and 7—as well as within pre-existing waste rock dump footprints. These locations are expected to provide a natural buffer from groundwater resources, thereby reducing the risk of contamination.</p> <p>Additionally, DEMIRS confirmed that the proposal includes the deposition of tyres within the landfill cells. To mitigate potential impacts, the Mining Proposal commits to maintaining a 10-metre setback from waste rock dump slopes. This measure is intended to ensure that the landfill materials, particularly tyres, do not compromise the long-term stability of the landforms.</p> <p>DEMIRS has indicated that it currently holds no concerns regarding the proposed activities outlined in the Works Approval application and that these activities appear consistent with those described in the Mining Proposal.</p>	Noted. The proposed setback of 10m from the waste rock landform has been imposed as a condition on the works approval.
Applicant was provided with first draft documents on 22 July 2025 and second draft documents on 29 July 2025	Refer to Appendix 1	Refer to Appendix 1

5. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a works approval 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) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

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

Condition	Summary of applicant's comment	Department's response
Comments on first draft package		
Cover page	The applicant has requested a 5 year period for this works approval.	Request granted. Standard duration for Works Approvals are five years.
Condition 1; Table 1	The applicant has requested correction of incorrect figure references in Table 1.	Figure references have been corrected as requested by the applicant.
Condition 1; Table 1 – Design and construction requirements	The applicant has requested that the reference to the distance to the highest level of the water table aquifer be updated to 2 metres, instead of 3 metres,	The Delegated Officer does not support the proposed amendment. The three (3) metre separation requirement is prescribed under the <i>Environmental Protection (Rural Landfill) Regulations 2002</i> . Reducing this distance may increase the risk of leachate migration and potential contamination of the underlying groundwater, which is inconsistent with the regulatory intent and environmental safeguards established under the legislation. Accordingly, the original requirement of a minimum three (3) metre separation will remain in effect.
	The applicant has requested that the construction requirement for fencing around landfill areas be amended to: "Each landfill area must be appropriately fenced (which may include other physical barriers) when operational", due to the location of the proposed landfilling sites (i.e. in pits and waste landforms).	The Delegated Officer has agreed to amend and relocate the fencing requirement to Condition 6 as a time limited operation requirement, reflecting the operational nature.
Condition 3	The applicant has requested removal of the requirement for the Environmental Compliance Report to include certification by a suitably qualified civil or structural engineer, noting that the landfill cells will not be lined and construction involves relatively simple earthmoving activities.	Amended as requested.
N/A	The applicant has requested inclusion of a condition for a Time Limited Operations phase, incorporating appropriate operational controls and monitoring requirements, to enable operation of the landfill area(s) post-construction while transitioning the infrastructure to an Operating Licence	A Time Limited Operations phase has been added to the Works Approval. Time Limited Operations were not requested on the application form and were therefore not initially added.

Condition	Summary of applicant's comment	Department's response
Comments on second draft package		
Condition 5 (b)	<p>The applicant has requested an amendment to the wording of condition 5(b) as follows:</p> <p>"...until such time as a licence for that item of infrastructure is granted in accordance with Part V of the Environmental Protection Act 1986, if one is applied for before the end of the period specified in condition 5(a)."</p>	<p>The Delegated Officer does not support the proposed change. Condition 5(b) reflects a standard clause used by the DWER to manage the duration of the time-limited operation (TLO) phase. This approach ensures consistency across regulatory approvals and aligns with the requirements outlined in DWER's Guide to Licensing.</p> <p>According to the <i>Industry Regulation Guide to Licensing</i>, the TLO phase is limited to a maximum of 180 days, during which the works approval holder must apply for a licence or registration. Importantly, the licence must be granted before the end of the TLO period for operations to continue lawfully. Allowing operations to proceed beyond this period based solely on the submission of a licence application would create a regulatory gap and pose compliance risks under the <i>Environmental Protection Act 1986</i>.</p> <p>Accordingly, the original condition will remain in effect.</p>
Condition 6; Table 2	The applicant has requested that the requirement for windblown waste collection be updated, proposing that waste be returned to the tipping area on a monthly basis rather than weekly.	<p>The Delegated Officer agrees to update the requirements for windblown waste collection frequency and tipping height, as requested. This follows the revised wording of the final dot point in the table to:</p> <p>"Each active landfill area must be secured by fencing and/or another physical barrier to prevent windblown waste from the premises to keep the windblown waste within the premises."</p> <p>It is acknowledged that increasing the tipping height may lead to more windblown waste, and the updated condition is intended to help manage this risk.</p>
	The applicant has requested to increase the height of tipping area up to 5 m as the additional height it required to effectively bury heavy vehicle tyres.	
Condition 7; Table 3	The applicant has requested removal of the estimated waste quantities from the table to allow flexibility in waste volumes due to changing operational needs.	The Delegated Officer agrees to remove the precise waste quantities (1,476 and 1,752) and replaced with " a combined total of 4,500 tpa. "