Government of Western Australia
Department of Water and Environmental Regulation

Decision Report

Application for Works Approval

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

Works Approval Number	W3050/2025/1
Applicant	Golden Spur Resources Pty Ltd
ACN	161 329 933
File number	APP-002817050
Premises	Bellevue Gold Project - Integrated waste landform tailings storage facility (IWLTSF) Stage 4 Mining tenements M36/24, M36/25 and M36/299 Leonora, Western Australia as depicted in Figure 1, Schedule 1
Date of report	22/09/2025 (**FINAL)**
Decision	Works approval 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 construction and operation of the premises. As a result of this assessment, works approval W3050/2025/1 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 28 March 2025, the applicant applied for a works approval under section 54 of the *Environmental Protection Act 1986* (EP Act).

The application is to undertake construction works relating to stage 4 of the integrated waste landform tailings storage facility (IWLTSF) at the premises. The premises is approximately 40km North of Leinster.

The premises relates to the category and assessed production / design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in works approval W3050/2025/1. 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 W3050/2025/1.

2.2.1 Previous approvals

The integrated waste landform TSF was constructed under W6724/2022/1. Table 1 summarises the stages already constructed:

Table 1: Previous approvals for the IWLTSF

Stage	Description	Status
Stage 1 In Pit TSF (IPTSF)	The conversion of Vanguard Pit (within IWTSF footprint) into an in-pit TSF.	Construction and Time limited operations (TLO) complete; operation authorised under L9259/2020/1.
Stage 2 TSF (effective crest 482.5 mRL)	Natural topography is utilised and northern and eastern embankments only to 484.5m (stage 3 height)	
Stage 3 Integrated Waste Landform TSF (IWLTSF) – to 484.5 mRL	The additional southern embankments to form an IWLTSF encompassing the IPTSF (stage 1) and TSF (stage 2) with mined waste rock.	Critical Containment Infrastructure Report submitted; assessed as compliant and TLO may commence on 15 May 2025. Ongoing operation will require a licence amendment.

2.2.2 IWLTSF stage 4 raise

This works approval application is for a stage 4 raise of 4.5m to RL 489m. For operational reasons this is designed to be implemented in two parts – Stage 4 North (footprint in red outline in Figure 1) and Stage 4 South (footprint in green outline in Figure 1). Stage 4 involves a downstream raise and extension of existing embankments.

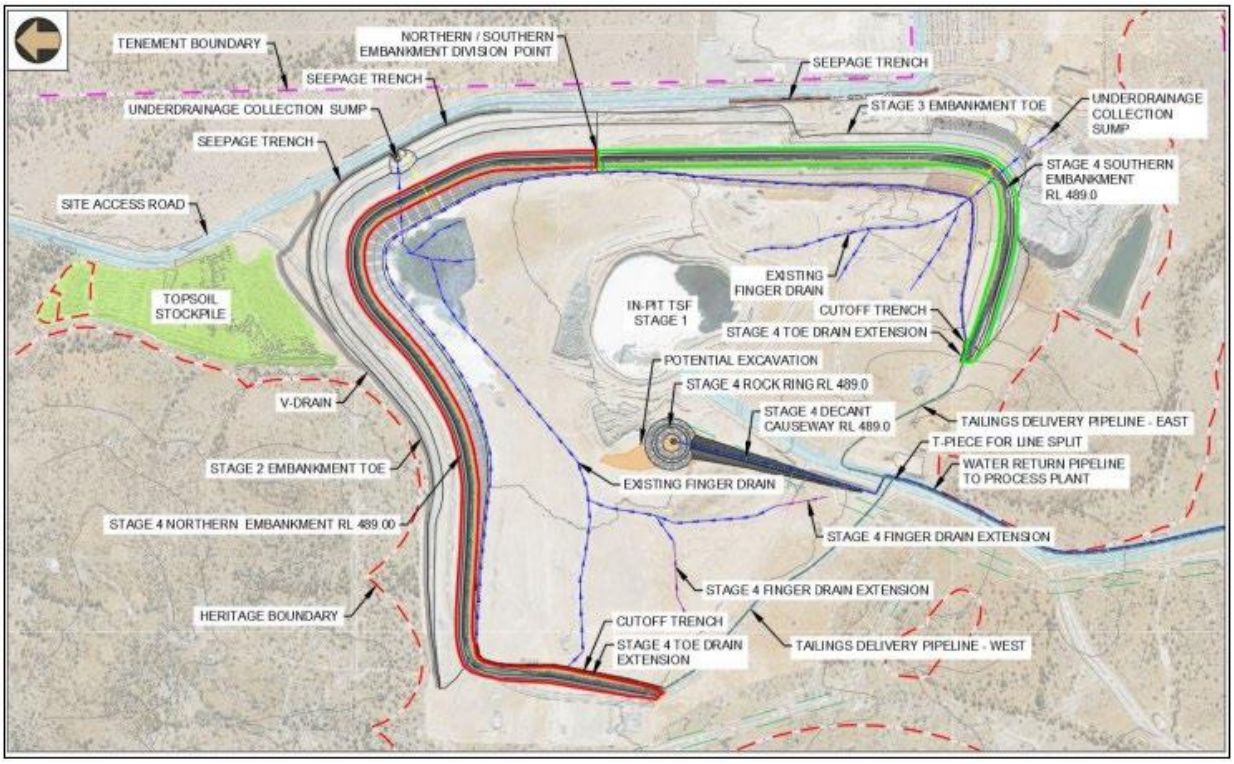

Figure 1: Plan view of IWLTSF stage 4 North (red) and South (green)

The planned sequence is:

1. Construction of the stage 4 North to RL 489.0 m
2. Deposition into stage 4 north up to RL 486.2m (at which height the topography will contain the material in the north intermediate area while constructing Stage 4 South to RL 489.0 m
3. Deposition into stage 4 south up to RL 486.2m (to match the deposition level of Stage 4 North, to keep the decant pond away from embankments)
4. Deposition into Stage 4 as a single facility with a crest elevation of RL 489.0 m (maximum discharge elevation RL 488.7m)

Embankments will be constructed of mine waste (zone 3A and 3B), compacted in lifts through traffic compaction. Zone 3B will form the bulk of the downstream embankment and will be constructed in maximum 1.0m traffic-compacted lifts, followed by Zone 3A in maximum 0.5 m traffic compacted lifts. The upstream batter, Zone 3C will be constructed using transitional mine waste material.

The embankment upstream face will incorporate a High-Density Polyethylene (HDPE) liner, underlain by a suitable subgrade and Bidim A24 geotextile (or equivalent) to provide enhanced puncture protection. An anchor trench will be constructed at the crest and the HDPE liner will be keyed in for stability.

The Stage 4 embankment extension beyond the existing embankments, will include a cutoff trench and toe drain that will integrate with the existing Stage 2 and Stage 3 cutoff trenches and underdrainage network. The HDPE liner in this section will be anchored at the bottom of

the cutoff trench. The cutoff trench will be constructed with low permeability material, to intercept lateral seepage through and beneath the embankments (Figure 2).

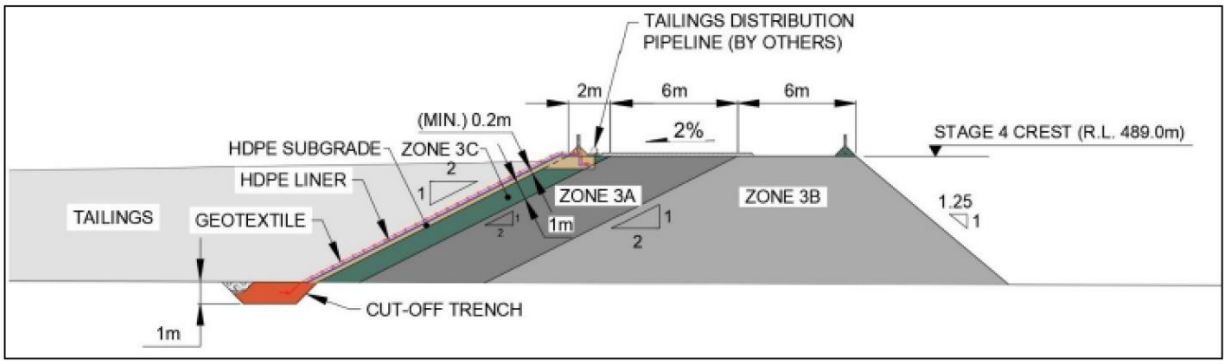

Figure 2: Typical section IWLTSF Stage 4 embankment extension, including cut-off trench configuration

ITWLTSF Stage 4 decant water recovery will be facilitated by the construction of a rock ring with access provided via a decant causeway extending from ridgeline to the south of the IWLTSF (Figure 6). The rock ring construction has been postponed from Stage 3 and repositioned.

A buttress will be constructed at the downstream toe of the IWLTSF embankment at the southeast corner of the facility. This buttress is designed to reinforce the embankment. It will be constructed to an elevation of 468.0 m with a maximum height of 5.0 m.

Tailings will be deposited using sub-aerial deposition techniques from the perimeter embankments from multi spigot locations, the spigot intervals will be between 20 m and 50 m.

IWLTSF Stage 4 North and Stage 4 South have been designed in accordance with the Australian National Committee on Large Dams (ANCOLD) Guidelines (ANCOLD, 2012), with a Dam Failure Consequence Category of 'High C' assigned to the facility. Similarly, an assessment based on the Department of Mines and Petroleum (DMP) Code of Practice (DMP 2013, Table 1) determined a 'Medium' hazard rating, while classification under Table 2 of the DMP Code of Practice (DMP 2013, Table 2) designates IWLTSF Stage 4 North and Stage 4 South as a 'Category 1' facility. A revised Mining Proposal has been submitted under the *Mining Act 1978*. Stability aspects of the design will be assessed under that Act, and do not for part of this assessment.

Time limited operation is requested separately for IWLTSF stage 4 north and IWLTSF stage 4 south. A deposition sequencing plan has been developed to facilitate Stage 4 construction while maintaining a centralised pond within the IWLTSF. Stage 4, at an assumed dry density of 1.4 t/m^3, is projected to provide 2.11M m^3 of storage capacity for 2.95 Mt of tailings.

2.2.3 Tailings characterisation

Tailings samples representing each of the four ore lodes and one ore sample (Tribune lode) were assessed and classified as Potentially Acid Forming (PAF).

All tailings' samples were enriched in copper; molybdenum and tellurium, whilst individual ore and tailings samples were enriched in bismuth, rhenium, selenium, and tungsten. These enrichments reflect those of the waste rock and the BGP mineralisation.

Kinetic testing completed in 2024 showed that when kept moist, acidification of tailings occurred after approximately 80 weeks (just over 18 months). Stage 4 IWLTSF is therefore designed such that deposited tailings are not exposed longer than 18 months before being covered with fresh tailings.

2.2.4 Freeboard

The works approval application evaluates freeboard requirements for both the Stage 4 North intermediate tailings storage scenario and the Stage 4 full capacity tailings storage scenario. The IWLTSF Stage 4 is expected to receive rainfall runoff from the catchment shown in Figure 3.

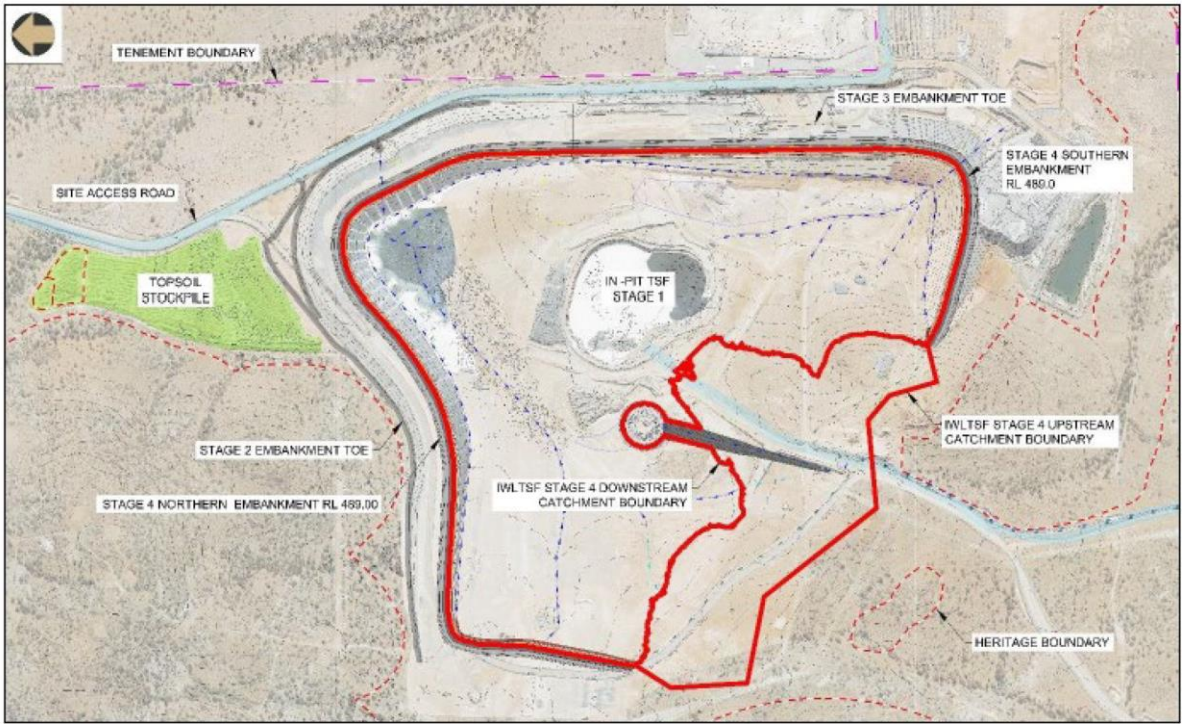

Figure 3: IWLTSF Stage 4 Total Catchment

Calculations in each scenario provide capacity for the 1:100-year annual exceedance probability (AEP) 72- hour storm event, as well as Department of Mines, Petroleum and Exploration (DMPE) required freeboard (DMP 2013) and ANCOLD (2012) additional freeboard.

It is calculated that the required minimum freeboard to the nominal operating pond is 1.26m. This means the maximum normal operating pond level once all embankments are constructed to RL 489.0m is RL 487.74m. During operation of the Stage 4 North Intermediate stage where the southern embankments are only complete to Stage 3 height (RL 484.5m), the maximum normal operating pond level is RL 483.24m.

The decant pumps are designed to extract the volume of water required for the target dry density, plus the probable maximum precipitation.

2.2.5 Seepage

A seepage assessment was conducted at two locations on the northeast and southeast sides of the proposed IWLTSF Stage 4 embankment, being critical sections where the embankment height is the greatest. A conservative seepage volume estimate through the embankment, based on this modelling is approximately 5.5 m^3/day for the southeastern embankment (994m length) and approximately 1.5 m^3/day for the northeastern embankment (1,516m length). A localised groundwater mound is anticipated beneath the IWLTSF during its operating life.

The TDS of the process water used in the Bellevue processing plant is between 90,000 and 120,000 mg/L, so the seepage water is also expected to be hypersaline. Expected contaminants are discussed in section 2.2.3.

The applicant's controls to minimise seepage are summarised in section 3.1.1 and shown in the figures within Appendix 1 of the issued works approval.

2.2.1 Water management

Tailings are to be deposited from the main embankment of the IWLTSF in a sub-aerial manner in thin lifts and beaching away from the perimeter embankments. The spigotting sequence will be such that the supernatant water pond is always maintained away from the perimeter embankments, initially near the IPTSF and later progressing towards the rock ring as the beach develops.

A new turret pump will be installed within the rock ring to extract decant water once the decant pond reaches the rock ring.

2.2.2 Monitoring

The application proposes continued operation of the existing IWLTSF groundwater monitoring bore and vibrating wire piezometer (VWP) networks, with no new monitoring points. The existing network consists of nine groundwater monitoring bores (including two nested pairs with shallow and deep bores) upstream and downstream of the IWLTSF as shown in Figure 4, and VWPs along the eastern embankment of the IWLTSF as shown in Figure 5. Construction compliance reports have been submitted for all bores under W6724/2022/1 and assessed as compliant. Additional VWPs may be installed if required by other approvals, without requiring amendment of this works approval as they do not alter emissions or discharges.

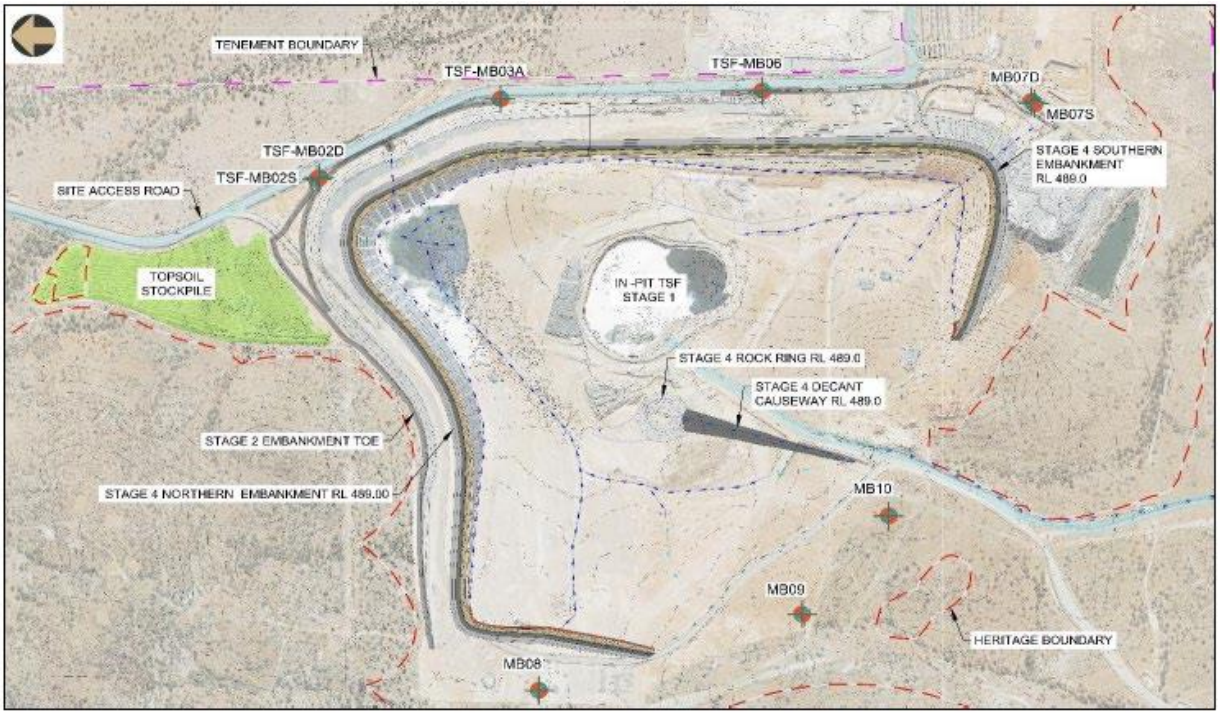

Figure 4: IWLTSF groundwater monitoring bores

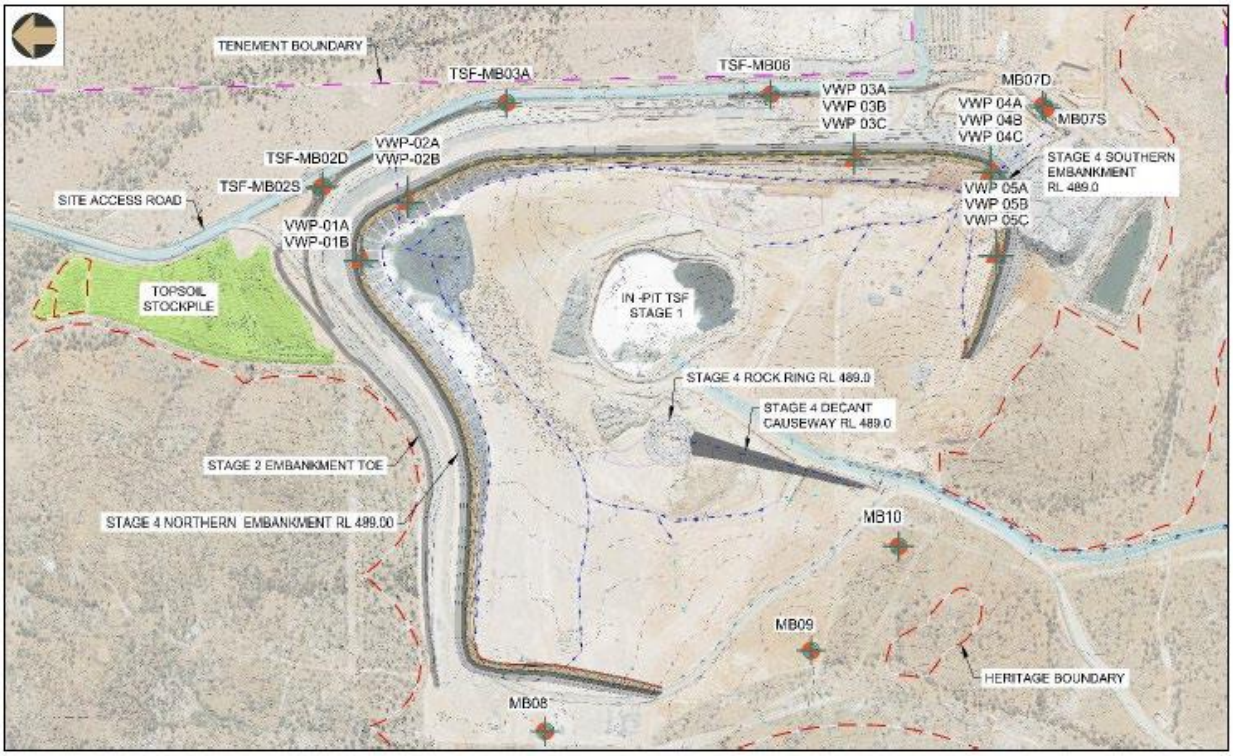

Figure 5: Current IWLTSF vibrating wire piezometer locations

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 (only considering changes in this amendment) which have been considered in this decision report are detailed in Table 2 below. Table 2 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 2: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Earthmoving, vehicle movements, lift off from stockpiles	Air/windborne pathway	• Water truck utilised as required. • Vehicle speed limits applied.
Hydrocarbon	Spill from vehicles, surface mobile	Air/windborne	Commitments from works approval W6724/2022/1:

Emission	Sources	Potential pathways	Proposed controls
spill	equipment and fuel tanks	pathway	• Hydrocarbons managed in accordance with Australian Standard 1940-2004: *The Storage and Handling of Flammable and Combustible Liquids*. • Hydrocarbons stored and transferred within low permeability compounds designed to contain not less than 110% of the volume of the largest storage vessel and at least 25% of the total capacity of all tanks for a multiple tanks system. • Fuel bowsers and fuel delivery inlets will be located on concrete or HDPE-lined pads to contain any drips and spills. The pads will drain to a sump. • Soil contaminated by hydrocarbons will either be treated in-situ or moved to a bioremediation area for treatment • Wash pads are to contain sumps and drains to capture spills which are regularly monitored and collected. • Drains and sumps are to be inspected both prior to heavy rainfall and after, to ensure no overflows occur. • Vehicles are to be cleaned in specified wash down facilities • Sediments and wastewater from wash down areas are to drain into lined sumps and the water treated to remove hydrocarbons. • Equipment maintenance is to be conducted within workshop areas and on concrete pads. • Spill kits will be located at all hydrocarbon and chemical storage facilities and carried on surface mobile equipment. • Water contaminated with hydrocarbons will be directed to a closed-circuit water treatment system. • Hydrocarbon wastes will be stored in bins, tanks or bunded pallets and disposed offsite by a Licensed contractor.
Operation			
Increased seepage of process water (hypersaline, containing elevated cyanide)	Increase due to increased elevation and footprint of IWSTSF	Seepage to groundwater, potentially impacting Lake Miranda Mounding into vegetation root zone causing plant stress or death Surface expression of seepage	Design measures • Embankments constructed with compacted mine waste and low permeability materials and HDPE liner on the inner wall to minimize seepage. • Underdrainage system (finger drains and toe drains) - existing and extended for stage 4). • Cut off trench under perimeter embankment. • Natural ground surface has been characterised as low permeability based on field observations and geotechnical investigations. Operational controls • Sub-aerial deposition to promote evaporation whilst continually depositing in lifts to minimise dust generation.

Emission	Sources	Potential pathways	Proposed controls
			• Maintaining a small decant pond away from the embankment. • Use of pre-leach and tailings thickeners to minimize water to tailings. • High rate of water recovery with a target of ~55% of the water from the tailings slurry being recovered. • Monitoring of pore pressure development within and downstream of the embankments. • Monitoring of groundwater levels and groundwater quality downstream of the embankments.
Overtopping of tailings water (Saline to hypersaline, containing elevated cyanide)	IWLTSF stage 4	Direct discharge to vegetation and soil	• Design operating freeboard calculated to allow for expected inflows. • Inspections performed at least once per 12-hour shift. • Regular monitoring of TSF freeboard.

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 3 and Figure 6 below provide 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 3: Sensitive human and environmental receptors and distance from prescribed activity

Environmental receptors	Distance from prescribed activity
Fauna of conservation significance identified on the premises: • Common Greenshank (*Tringa nebularia*) – Listed under the EPBC Act as Marine & Migratory • Sharp-tailed Sandpiper (*Calidris acuminata*) – Listed under the EPBC Act as Marine & Migratory • Sandplain worm-lizard (*Aprasia repens*) – Listed as a species of local significance • Australian Bustard (*Ardeotis australis*) – Listed as a species of local significance • Bush Stone-curlew (*Burhinus grallarius*) – Listed as a species of local significance	Identified within the project area.
Underlying groundwater (non-potable purposes)	Fractured rock aquifer with water levels approximately 15 – 30m below ground level. Total Dissolved Solids of 90,000 to 120,000 mg/L.

Violet Range (Perseverance Greenstone Belt) vegetation complexes (banded ironstone formation) – Threatened Ecological Community - Priority 1	Buffer zone for the PEC is present across the premises including the IWLTSF area.
Lake Miranda	The IWLTSF is approximately 1km upstream of Lake Miranda. Groundwater within the Project area flows south from the IWLTSF to the Lake Miranda, which acts as a groundwater sink. Groundwater at the lake is typically far shallower than at the mine area and may be less than two meters below the surface. These waters support halophytic vegetation across the lake.
Cultural receptors	**Distance from prescribed activity**
Aboriginal heritage sites	The IWLTSF is within the buffer zone of multiple registered aboriginal cultural heritage sites. A Native Title Agreement and Cultural Heritage Management Plan has been signed by the applicant and Tjiwarl Aboriginal Corporation. A letter was provided from Tjiwarl Aboriginal Corporation with the application for the 2023 amendment to W6724 stating that they have no objection to the placement of the IWLTSF.

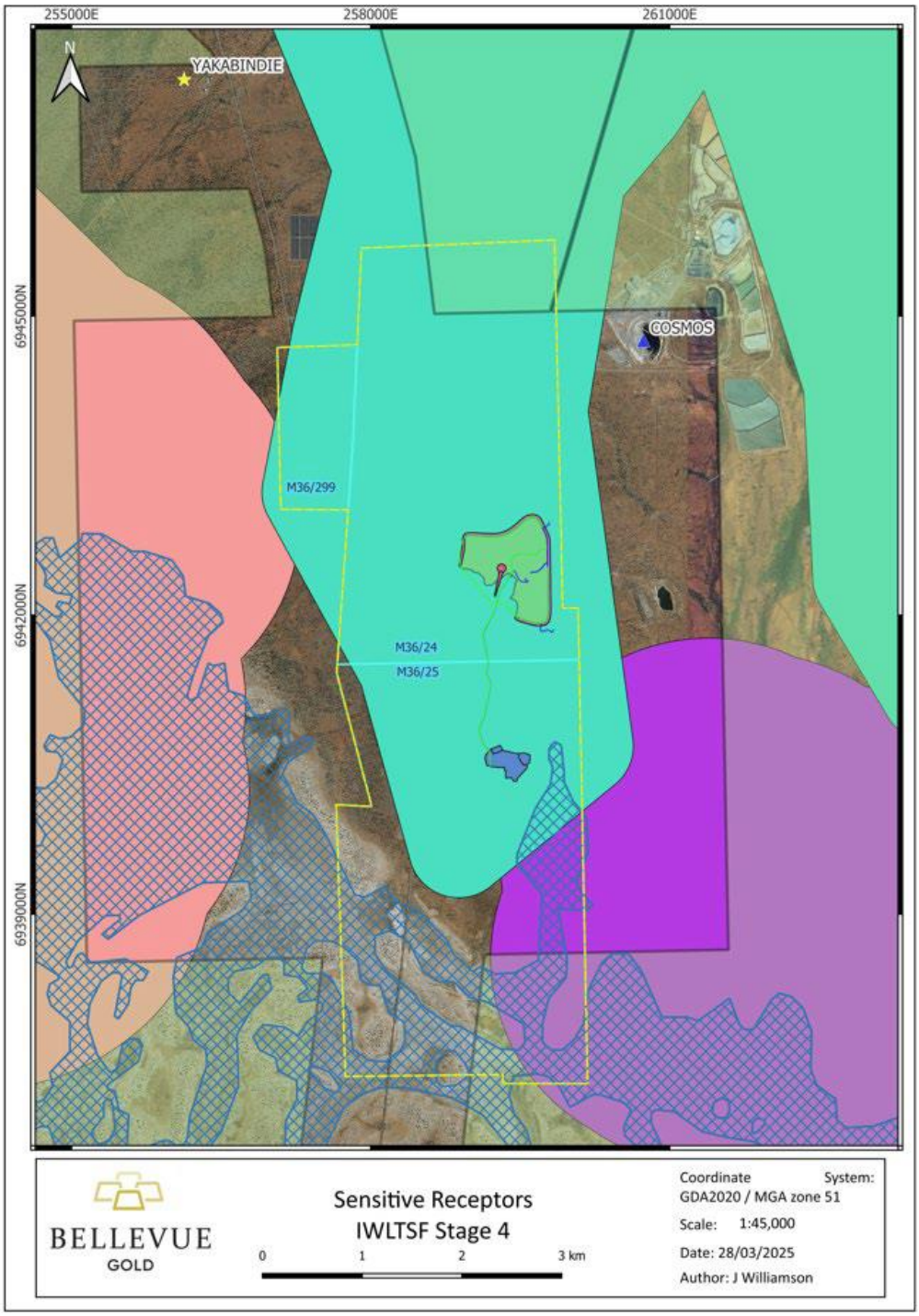

Figure 6: Distance to sensitive receptors

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 4.

Works approval W3050/2025/1 that accompanies this decision report authorises construction and time-limited operations. The conditions in the issued works approval, as outlined in Table 4 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

An amendment to licence L9259/2020/1 will be required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the IWLTSF. 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 4: 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								
Earthworks to raise and extend the IWL TSF	Dust	Air/windborne pathway causing impacts to plant stress	Native vegetation including Violet Ridge PEC	Refer to Section 3.1.1	C = Slight L = Unlikely **Low Risk**	Y	N/A	N/A
	Spill of hydrocarbons	Direct emission to soil; runoff to surface water	Soil, surface water		C = Minor L = Unlikely **Medium Risk**	Y	N/A	N/A
	Sediment laden stormwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Native vegetation including Violet Ridge PEC, surface water runoff to Lake Miranda		C = Slight L = Possible **Low Risk**	Y	N/A	N/A
Operation ***(including time-limited-operations operations)***								
Deposition of tailings into IWLTSF (Stage 4)	Increased hydraulic head leading to increased seepage from IWLTSF	Seepage from base and walls of TSF causing groundwater mounding reaching root zone of vegetation /soil contamination. Changes in water chemistry of groundwater, with potential impact to Lake Miranda	Vegetation / soil Groundwater, potentially discharging to Lake Miranda	Refer to Section 3.1.1	C = Moderate L = Possible **Medium Risk**	Y	**Condition 1 – construction conditions** **Condition 2 and 3 – compliance reporting** Condition 6 – operating conditions (TLO) Condition 8 - monitoring – **additional analytes (bismuth, rhenium, Tellurium, tungsten)**	Compliance reporting conditions required to validate construction in accordance with conditions. Additional analytes added to groundwater monitoring as they were identified as enrichments in the ore and tailings.

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**				
		Seepage from base and walls of TSF causing groundwater mounding and surface expression of seepage	Vegetation / soil Aboriginal heritage sites	Refer to Section 3.1.1	C = Moderate L = Unlikely **Medium Risk**	Y	**<u>Condition 9 – field monitoring calibration requirements</u>**	
	Tailings / return water	Spills or leaks from pipelines or sumps causing contamination of soil / impacts to vegetation	Vegetation / soil	Refer to Section 3.1.1	C = Moderate L = Unlikely **Medium Risk**	Y	Condition 1 – pipeline construction Condition 6 – pipeline inspections	
		Overtopping of TSF			C = Moderate L = Unlikely **Medium Risk**	Y	Condition 6 - freeboard and inspection requirements	
Wildlife accessing expanded decant ponds on IWLTSF and being impacted due to elevated cyanide concentrations	Decant water collecting on tailings facilities following deposition of tailings	Direct ingestion of water with elevated cyanide	Wildlife, particularly birds	Refer to Section 3.1.1	C = Minor L = Rare **Low Risk**	Y	**<u>Conditions 7 – decant pond monitoring.</u>**	Data from the IWLTSF decant pond to date (since 2023) shows that it is hypersaline, consistently above 100,000 mg/L. This minimises the likelihood of access by wildlife (Griffiths et al 2009). Processes for cyanide destruction are in place and although WAD CN has sometimes exceeded 50mg/L, the risk to wildlife is low. Condition included to monitor for cyanide levels only, to monitor the effectiveness of CN destruction.

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. **<u>Bold and underline text</u>** depicts additional regulatory controls imposed by department.

4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 12 June 2025.	None received	N/A
Advice sought from Department of Mines, Petroleum and Exploration (DMPE) on 10 June 2025.	DMPE replied on 14 July 2025 advising that the applicant has submitted an amended mining proposal for the IWLTSF Stage 4, received as Reg ID 500676. On preliminary review, this is consistent with the works approval application. The site plan/ layout, design parameters and operation controls were reviewed. Formal geotechnical review of this mining proposal or associated design report has not yet taken place. If there are any issues identified from this review, DMPE will inform DWER.	Noted. This works approval grants approval under Part V Division 3 of the EP Act only. The applicant must ensure that other required approvals are obtained before works commence. This includes approval of the amended Mining Proposal under the *Mining Act 1978*.
Applicant was provided with draft documents on 27 August 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. Australian National Committee on Large Dams (ANCOLD) (2012). *Australian National Committee on Large Dams: Guidelines on the Consequence Categories for Dams*
2. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
3. Department of Mines and Petroleum (DMP) (2013). *Code of Practice (CoP): Tailings Storage Facilities in 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. Griffiths SR, Smith GB, Donato DB, Gillespie CG 2009, Factors influencing the risk of wildlife cyanide poisoning on a tailings storage facility in the Eastern Goldfields of Western Australia, Ecotoxicology and environmental safety, 72(5), pp. 1579-1586.

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

Comment number	Condition	Summary of applicant's comment	Department's response
Draft instrument			
1	1, Table 1 items 1 and 2	Incorrect RL stated in 'infrastructure location' column.	Error corrected consistent with design specifications and Figure 2.
2	6, Table 2 item 1	Incorrect RL stated in 'infrastructure location' column.	Error corrected consistent with design specifications and Figure 2.
3	6, Table 2 item 2	Site infrastructure and equipment column item 2 should be IWLTSF stage 4 south (not north)	Agreed. Error corrected.
4	6, Table 2 item 2(f)	*"the decant pond must remain at least 100m from the embankment".* This will be challenging to meet whilst commissioning, therefore can we please reword this to "*the decant pond must remain at least 100m from the embankment once the beaches have fully developed*". Distance limits are more practical once the beaches have fully developed.	Accepted. Does not materially change the risk.
5	6, Table 2 item 2(g)	"*tailings not left uncovered for more than 3 months*", this was based on preliminary geochemical test work in 2022, the kinetic test work continued for over two and a half years. The results demonstrated that tailings acidification occurs after 18 months, therefore BGL requests that this condition be changed from 3 months to 18 months. The results of this test work and report are provided.	Accepted. Document provided in draft response: *Appendix A: Bellevue Gold Project 'Kinetic-Testwork' Programme over 2.5 years for "Non-Saline Tailings" and "Saline Tailings" Cases – Implications for Tailings Management*' Supports a conservative estimate of the lag phase for the PAF tailings (based on average representative sample) exceeding 18 months. Note that this relates to IWLTSF stage 4 only. Previous stages operated under other approvals are subject to the conditions of those approvals.
6	6, Table 2 item 2(h)	Floating pumps are not in use; please can this be changed to turret pumps	Wording simplified to make condition more outcomes-based.
7	7, Table 3	Requesting removal of decant pond WAD Cyanide trigger limit of 50mg/L. Data is provided to demonstrate that the decant pond water for the Bellevue TSF has remained consistently above 100,000mg/L, which significantly reduces the risk of access by wildlife.	Accepted – consistent with amendment to Bellevue licence L9259/2020/1 granted 4 September 2025. Risk assessment table updated based on decant pond data provided. Trigger limit removed in Table 3, monitoring retained. The updated risk assessment and removal of trigger makes the draft condition 8 redundant, so it has been removed. Conditions 9 onwards have been subsequently renumbered.
Draft decision report			
8	Cover page -	Include M36/299.	Clarification noted, query removed. Legal access for this tenement was

Comment number	Condition	Summary of applicant's comment	Department's response
	tenements		established during validation of the application.
9	Table 2 (Operation)	One of the proposed controls listed to manage increased seepage of process water is "*low permeability floor*", please can this be reworded as referring to the existing in-situ natural ground, which has been characterised as low permeability based on field observations and geotechnical investigations.	Noted. Reworded to clarify.
10	Section 2.2.2	Bellevue confirms the planned sequence is as described in the decision report wording.	Noted.