Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

Application for Works Approval Amendment

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

Works Approval Number	W6665/2022/1
Works Approval Holder	Venturex Sulphur Springs Pty Ltd
ACN	113 177 432
File Number	DER2022/000125 & APP-0032376
Premises	Sulphur Springs Zinc Copper Project Legal description - Part of mining tenements M45/653, M45/1001 and M45/494 MARBLE BAR WA 6760 As defined by the coordinates in Schedule 1 and the Premises maps attached to the Revised Works Approval
Date of Report	4 June 2026
Decision	Revised works approval granted

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1. Decision summary

Works Approval W6665/2022/1 is held by Venturex Sulphur Springs Pty Ltd (Works Approval Holder) for the Sulphur Springs Zinc Copper Project (the Premises), located 57 km west of Marble Bar in the Pilbara region of Western Australia.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the construction, commissioning and time limited operations of the Premises. As a result of this assessment, Revised Works Approval W6665/2022/1 has been granted.

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

2. Scope of assessment

2.1 Regulatory framework

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

2.2 Application summary

On 18 November 2025, the Works Approval Holder submitted an application to the department to amend Works Approval W6665/2022/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Extend the duration of the works approval until 7 September 2029;
- Operational layout changes to the processing plant;
- Design changes to process ponds;
- Removal of the run-of-mine (ROM) pad liner;
- Relocation of the putrescible landfill; and
- Relocation of the existing approved Waste Water Treatment Plant (WWTP) from the camp to the processing facility.

The proposed amendments do not result in changes to assessed prescribed premises category thresholds. The proposed changes are described in more detail under Section 2.2.1 below.

2.2.1 Amendments to Category 5 activities

2.2.1.1 Revised processing plant design

Since the 2022 approved processing plant design, the following design refinements have been made to improve operational efficiency, stability and constructability. The processing plant's throughput and location remain unchanged at 1.5 million tonnes per annum (Mtpa) of run of mine (ROM) ore and up to 1.4 Mtpa (dry) of tailings. The following design refinements are proposed as part of this amendment to be implemented under W6665/2022/1, without changing the approved processing capacity or environmental risk profile of the facility:

- Replacement of the previously approved two-stage crushing and Semi-Autogenous Grinding-Ball Mill-Crusher milling circuit with a three-stage crushing and ball mill comminution circuit to improve feed stability and downstream flotation performance;
- Optimisation of flotation circuits through simplified layouts, reduced recirculating loads,

reinstatement of conditioning stages and introduction of high-efficiency flotation cells.

- Installation of a trash screen upstream of flotation to reduce blockages and improve operational reliability;
- Amendment to the approved paste plant operating design, transitioning from a batch filtration and filter cake stockpiling process to a semi-continuous cyclone desliming, filtration and pumping system for flotation tailings, reducing tailings reporting to the TSF;
- Detailed design of the process water treatment circuit to improve water quality for reuse within the processing plant, including return of wheel wash water directly to the process plant; and
- Increased capacity of concentrate thickening, filtration, reagent storage and concentrate storage facilities to improve operational resilience.

The revised processing plant configuration is illustrated in Figure 1, which shows the updated crushing, milling, flotation and paste tailings circuits, and Figure 2, which shows the refined internal arrangement of processing infrastructure within the approved processing plant footprint.

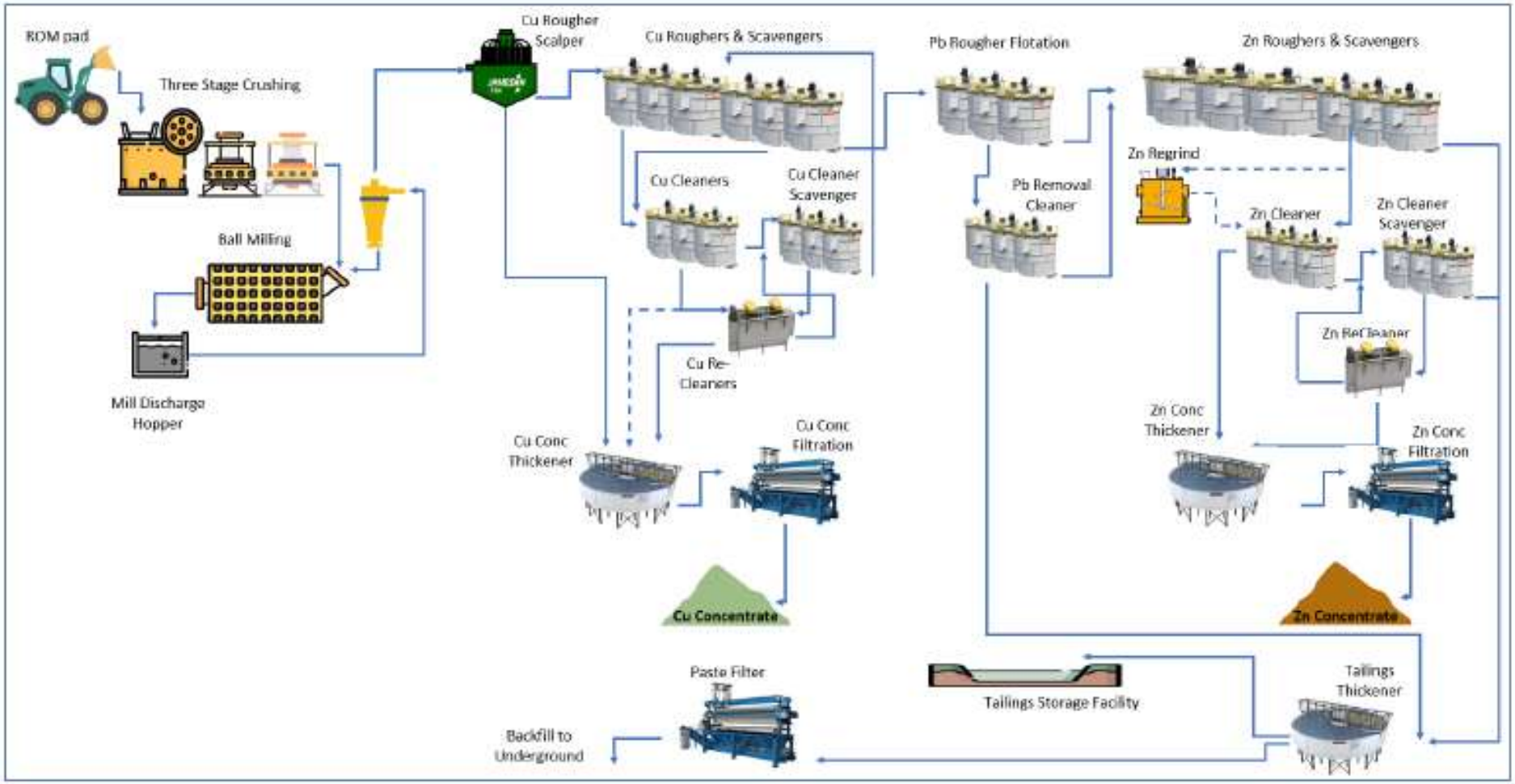

Figure 1: Simplified process flow diagram

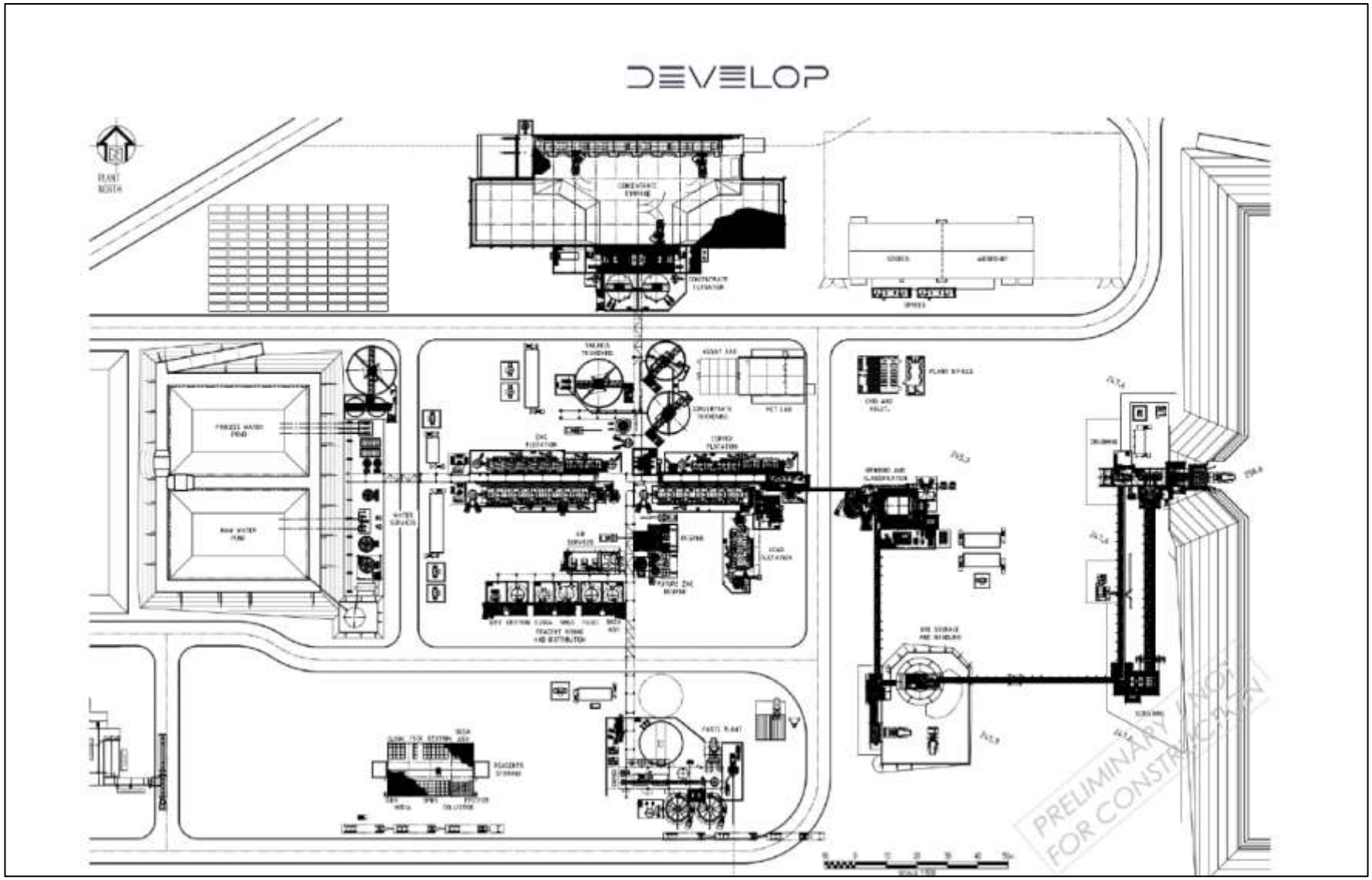

Figure 2: General processing plant layout

2.2.1.2 Process pond and sedimentation infrastructure changes

The following changes to containment infrastructure are proposed as part of this amendment:

- Process Water Pond and Mine Water Settling Ponds

  There are no changes to function or capacity, with the design freeboard reduced from 0.5 m to 0.3 m.

- Plant Site Runoff Pond

  The capacity of the pond has been reduced to reflect a smaller contaminated runoff footprint, now limited to the ROM pad and process plant. Runoff from the powerhouse, LNG storage and Raw Water Turkey's Nest has been diverted away from the pond. The design freeboard has also been reduced from 0.5 m to 0.3 m.

- Sedimentation Pond

  The sedimentation pond has been revised from the previously approved 20,000 m³ pond with 0.5 m freeboard to an approximately 5,000 m³ pond located downstream of the haul road. The revised design captures sediment-laden runoff from the haul road and adjacent infrastructure, incorporates flow control measures such as windrows and culverts, and is intended to manage sediment only, not contaminated water.

2.2.1.3 Removal of ROM pad liner

The Works Approval Holder has requested removal of the HDPE liner requirement under Condition 1 (Table 1) of works approval W6665/2022/1 citing concerns regarding structural integrity during construction and long-term performance under heavy machinery traffic.

The ROM pad is proposed to be located within the process plant runoff catchment, such that all surface water runoff, including from the ROM pad, will be captured and directed to the Site Runoff Pond for management. The ROM pad will temporarily store up to 120,000 tonnes of low-grade ore and/or potentially acid forming (PAF) waste rock during the early stages of underground mining.

As the ore may be PAF, the ROM pad was originally proposed to be lined to reduce the risk of acidic seepage generated by rainfall percolating through the stockpiled material. However, the Works Approval includes a requirement that the ROM pad be constructed using non-acid forming (NAF) material, which provides a level of protection against potential seepage impacts.

In addition, the condition requires the ROM pad to be graded to sumps to capture seepage from stockpiles and contaminated stormwater runoff. Retaining this requirement is considered the primary control measure for managing potential contamination, and it remains appropriate notwithstanding the removal of the liner requirement.

2.2.2 Amendment to Category 64 activities

The Works Approval Holder seeks approval to relocate the existing Category 64 Class II landfill, which accepts putrescible and non-recyclable inert waste. The landfill was originally approved to be constructed within the footprint of the Waste Rock Landform (WRL) and subsequently within overburden deposited on the WRL. As construction of the WRL has not yet commenced, the landfill is proposed to be relocated to a new site southeast of the project area on flat, elevated ground outside natural drainage lines.

The landfill will consist of a series of trenches, with only one trench open at any given time, and a maximum design footprint of approximately 30 m long, 10 m wide and 4 m deep. The landfill will be managed in accordance with the *Environmental Protection (Rural Landfill) Regulations 2002* and will accept up to 700 tonnes per annum of waste.

2.2.3 Amendment to Category 85 activities

The Works Approval Holder proposes to relocate the approved 75 m³ WWTP from the camp to the processing facility. Treated wastewater will be irrigated via above-ground sprinklers to a fenced 2.5 hectare (ha) sprayfield, which has been relocated further north-northwest to accommodate a potential future solar farm. The relocated sprayfield retains the design parameters approved under the existing Works Approval and has been sited and sized in accordance with Water Quality Protection Note 22, based on local soil conditions and a groundwater depth of approximately 15 m. Treated effluent disposal will remain within the approved site-wide discharge limit of 75 m³/day.

The relocation of the WWTP and minor adjustment to the sprayfield location do not alter the nature of emissions, pathways or receptors previously assessed, and the existing risk assessment for Category 85 activities remains applicable. Accordingly, no additional risk assessment or separate risk event is required for this amendment.

2.3 Part IV of the EP Act

The Sulphur Springs Zinc Copper Project was assessed by the Environmental Protection Authority (EPA) under section 38 of Part IV of the EP Act and approved by the Minister for Environment under Ministerial Statement (MS) 1134 on 20 May 2020 (EPA Report No. 1671).

The proposal is subject to MS 1134, which includes conditions relevant to this assessment. Condition 6-1 requires the proponent to manage the implementation of the proposal to ensure there are no impacts to *Pityrodia sp. Marble Bar* (G. Woodman & D. Coultas GWDC Opp 4), as delineated in Figure 3 and Schedule 2 of the Statement.

Conditions 3-1 and 3-2 of MS 1134 require that commencement of implementation within five (5) years of the date of the Statement be demonstrated as substantial, with written evidence provided to the CEO within that timeframe. The applicant notified EPA Services of the substantial commencement of works on 25 February 2026, in accordance with Condition 3-2 of MS 1134. The departments Regulatory Assurance branch provided confirmation on 16 April 2026 that the applicant has demonstrated substantial commencement of works for the purposes of MS 1134. This confirmation supports the department's consideration of the application to extend the duration of Works Approval W6665/2022/1.

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 Amendment Report are detailed in Table 1 below. Table 1 also details the proposed control measures the Works Approval Holder has proposed to assist in controlling these emissions, where necessary.

Table 1: Works Approval Holder controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Construction of ROM pad (without HDPE liner), containment ponds, and relocated WWTP and irrigation field Vehicle movements on unsealed roads	Air/windborne pathway	Applicant controls: • Dust suppression using dedicated water carts; and • Application of speed limits.
Commissioning and Time Limited Operations			
Potentially acidic seepage from ore stockpiles and sediment laden stormwater runoff	Ore stored on unlined ROM pad	Seepage from ore stockpiles and overland runoff from the ROM pad	Works Approval W6665/2022/1 existing controls: • Condition 1 (Table 1): Design and construction requirements: ROM pad: - Constructed on naturally elevated ground with a base of non-acid forming (NAF) waste; and - Captured water to transfer to the processing plant water circuit or the water treatment plant; Site Runoff Pond - Capacity for 1 in 100 year, 72 hour event; - Captured stormwater is directed to the water treatment plant; and - Plant site drainage directed to HDPE lined stormwater pond (Pond Site Runoff Pond). • Condition 11 (Table 4): Environmental commissioning and Condition 21 (Table 6) Infrastructure and equipment requirements during Time Limited Operations: - Visual monitoring of Plant Site Runoff Pond post runoff events;

			and - Sampling and analysis of Plant Site Runoff Pond water post significant run-off events. Applicant controls • ROM pad located within the process runoff catchment; and • Minimum design freeboard of 0.3m;
Contaminated water (process water, mine water or contaminated stormwater)	Operation of site stormwater and process water ponds (Site Runoff Pond, Process Water Pond and Mine Water Settling Ponds) with reduced freeboard/capacity	Overtopping of ponds during high-rainfall events and overland flow	Works Approval W6665/2022/1 existing controls: • Condition 1 (Table 1): Design and construction requirements: - Lined with 1.5mm HDPE; and - Site runoff Pond designed to retain contaminated stormwater from a 1 in 100 year, 72 hour event. • Condition 11 (Table 4): Environmental commissioning and Condition 21 (Table 6) Infrastructure and equipment requirements during Time Limited Operations: - Visual monitoring of Plant Site Runoff Pond post runoff events; and - Sampling and analysis of Plant Site Runoff Pond water post significant run-off events.
Leachate	Operation of landfill facility in new location	Infiltration to soil through to groundwater	Works Approval W6665/2022/1 existing controls: • Condition 1 (Table 1): Design and construction requirements: - Landfill constructed as a series of trenches, with one trench open at any time; - Waste rock bunds (windrows) constructed around trenches to contain incident rainfall and prevent surface runoff entering trenches; - Infiltration of rainfall minimised by capping completed trenches with compacted, slightly mounded fill;
Windblown waste		Air/windborne	Works Approval W6665/2022/1 existing controls:

		pathway	• Condition 1 (Table 1): Design and construction requirements and Condition 21 (Table 6) Infrastructure and equipment requirements during Time Limited Operations: - Temporary mesh fencing 2 metres in height will be deployed around the landfill facility to exclude fauna and contain windblown litter; and - Waste in the active trench will be covered by earth and waste rock at fortnightly intervals.
Contaminated stormwater (that has come into contact with waste)		Overland runoff after rainfall events	Works Approval W6665/2022/1 existing controls: • Condition 1 (Table 1): Design and construction requirements: - Waste rock bunds (windrows) constructed around trenches to contain incident rainfall and prevent surface runoff entering trenches.

3.1.2 Receptors

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

Table 2 below provides a summary of potential 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 environmental receptors and distance from prescribed activity

Environmental receptors	Distance from prescribed activity
Native vegetation	Native vegetation adjacent to landfill facility, containment ponds and ROM pad.
Conservation significant flora	Flora and vegetation surveys identified three conservation significant flora species within or adjacent to the premises boundary: - *Pityrodia sp. Marble Bar* (G. Woodman & D. Coultas GWDC Opp 4) listed as endangered under the *Biodiversity Conservation Act 2016* (BC Act) and the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act); - *Euphorbia clementii* listed as priority 3 (DBCA); and - *Ptilotus mollis* listed as priority 4 (DBCA). Impacts to conservation significant flora are considered to be adequately managed under MS1134. The Department of Biodiversity, Conservation and Attractions has recorded two records of Quoya zonalis listed as endangered under BC Act and threatened under the EPBC Act. - recorded 440m from the new location of the landfill facility - recorded 600m from the plant area.
Surface water	An ephemeral river known as the 'Shaw River' occurs 10 kilometres east of the Premises boundary. Surface waterlines associated with the Shaw River occur within the Premises boundary. - Landfill facility occurs adjacent to a surface water line. - The plant site (incorporating the containment ponds, ROM pad and processing plant) occurs adjacent to a surface waterline.
Groundwater	Baseline data indicates that groundwater outside the proposed pit area is about neutral, has high alkalinity, low to moderate salinity, and generally low concentrations of metals and metalloids.

	Groundwater within the proposed pit area is acidic (as low as pH 2.8), has low to moderate salinity, low alkalinity and elevated concentrations of metals and metalloids. Depth to the water table varies across the Premises with the depth in the mine area being generally less than two metres.
Aboriginal heritage sites	Three Aboriginal Heritage Sites occur within the Premises boundary. The revised location of the Landfill Facility occurs 625m north-west of an Aboriginal Heritage Site known as VRX20-002 (Registration ID: 38627). The plant site (incorporating the containment ponds, ROM pad and processing plant) occurs approximately 950m northwest of the Aboriginal Heritage Site known as VRX20-002 (Registration ID: 38627).

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the Works Approval Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Works Approval Holder'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 Works Approval Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

The Revised Works Approval W6665/2022/1 that accompanies this Amendment Report authorises construction and time-limited operations. The conditions in the Revised Works Approval have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the Premises i.e. Category 5, 64 and 85 activities. A risk assessment for the operational phase has been included in this Amendment 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 Event					Risk rating[1] C = consequence L = likelihood	Works Approval Holder's controls sufficient?	Conditions[2] of works approval	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Works Approval Holder's controls**				
Construction of ROM pad (without HDPE liner), containment ponds, and relocated landfill Vehicle movements on unsealed roads	Dust	**Pathway:** Air / windborne pathway **Impact:** Impacts to adjacent remnant vegetation, conservation significant flora species, and Aboriginal Heritage Sites through dust deposition	Native vegetation Threatened flora (*Quoya zonalis*) Aboriginal heritage site	Refer to Section 3.1	C = Minor L = Possible **Medium Risk**	Y	N/A	Dust impacts on flora and vegetation were assessed by the EPA under Part IV of the EP Act. MS 1134 condition for Quoya zonalis monitoring
Commissioning and Operation (including time-limited-operations operations)								
Storage of PAF ore on unlined ROM pad	Potentially acidic seepage and sediment laden stormwater	**Pathway:** Overland runoff / seepage infiltration **Impact:** localised contamination of groundwater / ephemeral drainage lines, soils and adjacent vegetation	Surrounding native vegetation Surface waterlines Groundwater	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	Condition 1 (Table 1): design and construction requirements Condition 11 and Condition 21: monitoring requirements during commissioning and time-limited operations	No additional controls are required as runoff from the ROM pad is fully contained within the plant site runoff system and managed via the HDPE-lined Site Runoff Pond. Existing containment and monitoring requirements maintain the risk at an acceptable level.
Operation of site stormwater and process water ponds (Site Runoff	Contaminated water (process water, mine	**Pathway:** Overtopping of ponds during high-	Surrounding native	Refer to Section 3.1	C = Moderate L = Unlikely	Y	Condition 1 (Table 1): design and construction	No additional regulatory controls are required as the site stormwater and

Pond, Process Water Pond and Mine Water Settling Ponds) with reduced freeboard/capacity	water or contaminated stormwater)	rainfall events and overland flow **Impact:** Soil contamination, increased sedimentation and impacts to surface water quality and adjacent vegetation.	vegetation Groundwater Surface water lines		**Medium Risk**		requirements Condition 11 and Condition 21: monitoring requirements during commissioning and time-limited operations	process water ponds remain lined, engineered containment structures designed to capture a 1-in-100-year, 72-hour rainfall event.
Operation of landfill facility in new location	Leachate	**Pathway:** Infiltration to soil through to groundwater. **Impact:** Groundwater and surface water contamination	Native vegetation Surface water lines Groundwater	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	**<u>Condition 21: Infrastructure and equipment requirements during time-limited operations for containment of windblown waste</u>**	<u>DWER controls</u> To minimise potential impacts to environmental receptors, the delegated officer has included a requirement that any windblown waste observed outside the tipping area be collected and returned on a monthly basis.
	Windblown waste	**Pathway:** Air/windborne pathway **Impact:** Fauna ingestion, accumulation of rubbish in drainage lines or vegetation.	Native vegetation Surface water lines Fauna			N		
	Contaminated stormwater	**Pathway:** Overland runoff during rainfall events **Impact:** Soil and surface water contamination. Impacts to native vegetation	Native vegetation Surface water lines		C = Minor L = Unlikely **Medium Risk**	N	Condition 1 (Table 1): design and construction requirements **<u>Condition 21: Infrastructure and equipment requirements during time limited operations for</u>**	<u>DWER control</u> A new requirement has been added to ensure contaminated stormwater is minimised by ensuring clean runoff is diverted around trenches and any contaminated water is captured and prevented from being released into

							putrescible landfill stormwater runoff management	the environment.

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

Note 2: Proposed Works Approval Holder's 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
Works Approval Holder was provided with draft amendment on 13 May 2026	Refer to Appendix 1.	Refer to Appendix 1.

5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Works Approval will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

5.1 Summary of amendments

Table 5 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Works Approval as part of the amendment process.

Table 5: Summary of works approval amendments

Condition no.	Proposed amendments
DWER file number	Administrative updates.
Duration	Works Approval extended to 7 September 2029.
Premises details	Administrative updates.
Licence History table	Inclusion of current amendment details.
Condition 1 (Table 1)	Updated to reflect revised works approval scope, including removal of the HDPE-liner from the ROM pad, alignment with the revised processing plant design, relocation of the authorised Category 64 Class II landfill, and relocation of the WWTP with adjustment to the irrigation sprayfield. (Item 8) – The sedimentation pond has been removed from Table 1 in accordance with the comments outlined in Appendix 1.
Condition 5 and 6	Administrative updates – removed reference to condition 2 as Condition 5 and 6 are related to non-critical containment infrastructure.
Condition 10	Administrative updates – Condition 10 has been updated to reference both Conditions 5 and 7, including submission of the Critical Containment Infrastructure Report, to reflect that the TSF is also subject to environmental commissioning. This requirement was inadvertently omitted when the Works Approval was granted.
Condition 21 (Table 6)	Condition 21 has been amended to update landfill operational requirements, including relocating relevant construction requirements from Table 1, and

	incorporating additional regulatory controls such as monthly collection of windblown waste and stormwater management.
Condition 2 (Table 2) Condition 3 (Table 3) Condition 12 (Table 5) Condition 21 (Table 6) Condition 22 (Table 7)	Administrative updates to reflect changes to figure numbering.
Schedule 1 Premises map	Administrative update.
Schedule 1 Figure 2	Figure 2 updated to reflect proposed infrastructure relocations and revised site layout.
Schedule 1 Figure 3	Figure 3 updated to reflect the revised processing plant layout.
Schedule 1 Figure 11	Figure 11 updated to reflect proposed infrastructure relocations.
Schedule 1 Figures 4 to 13	Administrative update to figure numbering for Figures 4–13.

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. DEVELOP Global Limited 2025, *Sulphur Springs Copper-Zinc Project – Works Approval Amendment Application*, Perth, Western Australia.
4. DEVELOP Global Limited 2026, *Response to Request for Further Information – Application to Amend Works Approval W6665/2022/1 (APP-0032375)*, correspondence to the Department of Water and Environmental Regulation, 13 January 2026.
5. DEVELOP Global Limited 2026a, *Response to DWER on Draft Amendment Report and Works Approval W6665/2022/1 (APP-0032375)*, correspondence to the Department of Water and Environmental Regulation, 22 May 2026.
6. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
7. Environmental Protection Authority 2020, *EPA Report 1671: Sulphur Springs Zinc-Copper Project*, Perth, Western Australia
8. Tiedemann, K. 2025, Sulphur Springs Processing Plant Design Changes vs Works Approval, memorandum for DEVELOP Global Limited, December 2025.
9. Venturex Sulphur Springs Pty Ltd 2025, *Sulphur Springs Zinc-Copper Project – Substantial Commencement Notice Letter (Ministerial Statement 1134)*, letter to the

Chief Executive Officer, Department of Water and Environmental Regulation, 20 February 2025.

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

Condition	Summary of Works Approval Holder's comment	Department's response
Condition 1 (Table 1) Design and construction / installation requirements – (Item 1) Processing Plant: Crushing	The Works Approval Holder has advised that the three-stage crushing circuit wording is sufficient, and separate references to the primary crusher, discharge conveyor and surge bin can be removed to avoid duplication.	Table 1, Item 1 updated to remove separate references already captured by the three-stage crushing circuit wording.
Condition 1 (Table 1) Design and construction / installation requirements – (Item 1) Processing Plant: Flotation (Copper and Zinc)	The Works Approval Holder requested amending the flotation circuit wording to clarify it includes the copper-zinc circuit, not just zinc.	Table 1 (Item 1) – Processing Plant: Flotation (Copper and Zinc) has been updated to clarify that regrind infrastructure is incorporated within the broader copper-zinc flotation circuit, not limited to zinc.
Condition 1 (Table 1) Design and construction / installation requirements – (Item 1) Processing Plant: Concentrate	The Works Approval Holder requested amending the requirement to clarify that the wheel wash facility discharges directly back to the process plant.	Table 1 (Item 1) Processing Plant: Concentrate has been updated to reflect that the wheel wash facility discharges directly to the process plant, with the Department accepting the amendment as it maintains the original intent.
Condition 1 (Table 1) Design and construction / installation requirements – (Item 3) Paste Fill Plant	The Works Approval Holder has requested removal of the requirement for temporary filter cake storage, advising it is no longer required due to the semi-continuous operation of the paste fill plant.	Table 1 (Item 3) has been updated, with the Department considering the removal of this requirement acceptable, noting that temporary filter cake storage is no longer necessary due to the semi-continuous operation of the paste fill plant. Section 2.2.1.1 of the decision report has been updated to reflect these changes.
Condition 1 (Table 1) Design and construction / installation requirements – (Item 3) Paste Fill Plant	The Works Approval Holder has requested amending the requirement to reflect that the Paste Fill Plant operates as a semi-continuous cyclone desliming, filtration and pumping process, rather than a continuous thickening process.	Table 1 (Item 3) has been updated, with the Department considering the amended wording acceptable as it more accurately reflects the proposed semi-continuous cyclone desliming process without altering the overall intent or risk profile of the activity. Section 2.2.1.1 of the decision report has been updated to reflect these changes.

Condition	Summary of Works Approval Holder's comment	Department's response
Condition 1 (Table 1) Design and construction / installation requirements – (Item 5) Raw Water Pond	The Works Approval Holder has requested confirmation on whether the 0.5 m freeboard requirement for the Raw Water Pond is intended, or if it should be amended to 0.3 m to align with other facilities.	The Department notes that the Raw Water Pond has already been constructed and is no longer within the scope of this amendment; therefore, the freeboard requirement cannot be revised to bring the Works Approval Holder into compliance. As confirmed, construction was completed on 10 November 2025, and any deviation from the approved design conditioned, including freeboard, will instead be considered as part of the assessment of the Environmental Compliance Report. Accordingly, the requirement remains unchanged in the Works Approval.
Condition 1 (Table 1) Design and construction / installation requirements – (Item 6) Mine Water Settling Ponds	The Works Approval Holder has requested clarification that the 4,000 m³ capacity refers to the combined capacity of two facilities: a concrete sediment settling/bog-out bay and an HDPE-lined mine water settling pond.	The Department notes that the Works Approval Holder responded on 2 September 2022 to the Department's draft original works approval, requesting that the mine water settling pond(s) include the following design requirements: capacity of 4,000 m³, minimum design freeboard of 0.5 m, lined with 1.5 mm HDPE, and provision for two ponds, one to be constructed during initial plant construction and a second during the operational phase if required. No further detail was provided by the applicant at that time. These requirements were incorporated into the original Works Approval as requested, and the Department considers the current wording to be consistent with those requirements.
Condition 1 (Table 1) Design and construction / installation requirements – (Item 7) South Pond	The Works Approval Holder notes the construction requirement for the South Pond to be lined with 1.5 mm HDPE and has requested preliminary feedback on whether alternative liner technologies, such as a bituminous geomembrane liner, could be considered, subject to appropriate design, compatibility assessment and certification.	The Department notes that the primary approval for the South Pond is Ministerial Statement 1671, which specifies that the pond is to be HDPE lined. As previously advised in correspondence on 6 November 2026, any change to the liner would require an amendment to Ministerial Statement 1671 under Part IV of the EP Act prior to any changes being considered under Part V. Accordingly, the Department cannot provide definitive comment on alternative liner technologies at this stage. Should the Works Approval Holder wish to pursue this change, they will need to engage with Environmental Protection Authority Services Branch to seek amendment of the Ministerial Statement, followed by an amendment to the Works Approval to ensure consistency across approvals.
Condition 1 (Table 1) Design and construction / installation	The Works Approval Holder has requested amending the requirement from "occupies 16 ha" to "occupies up to 16 ha."	The Department considers that the amendment to "occupies up to 16 ha" does not alter the environmental risk profile, as it

Condition	Summary of Works Approval Holder's comment	Department's response
requirements – (Item 7) South Pond		remains within the originally assessed footprint. The Department also notes there are no conditions under Ministerial Statement 1671 prescribing a fixed footprint of 16 ha. Accordingly, the amendment is considered acceptable.
Condition 1 (Table 1) Design and construction / installation requirements – (Item 7) South Pond	The Works Approval Holder notes the requirement for a maximum storage volume of 1,000,000 m³ and clarifies that while this is accepted as the maximum design volume, the constructed volume may be less, provided it is designed and managed to comply with the specified stormwater containment and freeboard requirements.	The Department notes and accepts the clarification that the maximum storage volume of 1,000,000 m³ represents the design upper limit. This clarification does not alter the environmental risk profile, as the approved maximum capacity remains unchanged and the facility will continue to meet the specified stormwater containment and freeboard requirements.
Condition 1 (Table 1) Design and construction / installation requirements – (Item 7) South Pond	The Works Approval Holder has requested confirmation that the intent of the requirement is to divert upgradient hillslope runoff around the South Pond embankments for embankment protection and clean water separation, with optional provision to intercept and capture runoff for operational water supply.	The Department notes that this wording was derived from the supporting documentation provided by the Works Approval Holder as part of the original Works Approval application. The department considers that the requirement is intended to control the potential for clean surface water to become contaminated through ingress to the South Pond, which may increase the volume of impacted water and the risk of discharge or seepage to the environment. The Department considers that the environmental risk is adequately managed through existing design and containment controls; therefore, the requirement is not considered necessary and has been removed.
Condition 1 (Table 1) Design and construction / installation requirements – (Item 8) Sedimentation Pond	The Works Approval Holder has requested amendment of the sedimentation pond capacity from 20,000 m³ to 5,000 m³ to align with the revised design described in the Amendment Report.	The Department notes that this was a typographical error and has amended Table 1 (Item 8) to reflect the revised sedimentation pond capacity of 5,000 m³.
Condition 1 (Table 1) Design and construction / installation requirements – (Item 8) Sedimentation Pond	The Works Approval Holder has requested confirmation on whether a minimum design freeboard of 0.5 m is required for the sedimentation pond, noting that the facility is designed to manage runoff from the mine haul road by slowing flows, allowing sediment to settle, and discharging clarified stormwater, and is not intended to contain contaminated plant runoff, which is managed separately via the Site Runoff Pond.	The Department notes that the sedimentation pond is intended to manage runoff from the mine haul road and is not designed to contain contaminated water, which is managed separately via the Site Runoff Pond. Given the low environmental risk posed by this infrastructure and its function to detain and settle sediment from relatively clean stormwater flows, the Department considers that a minimum design freeboard of 0.5 m is not necessary. Accordingly, the specific freeboard requirement has been removed from the works approval.

Condition	Summary of Works Approval Holder's comment	Department's response
Condition 1 (Table 1) Design and construction / installation requirements – (Item 9) Wastewater Treatment Plant	The Works Approval Holder has noted that the location of the WWTP location needs updating to reflect that the accommodation camp will no longer be constructed at Sulphur Springs, and that the WWTP will instead be located within the processing plant area as shown on the updated plant layout.	The Department notes that Figures 1 and 2 under Schedule 1 have been updated to reflect the relocation of the WWTP from the accommodation camp at Sulphur Springs to the processing plant area.
Figures 1 and 11 of Schedule 1: Maps	The Works Approval Holder provided the updated figures under Schedule 1 as requested by the department.	Figures 1 and 11 under Schedule 1 of the works approval have been updated accordingly.