SANDY RIDGE
Compliance Assessment Report No. 3
Ministerial Statement 1078

Prepared for

Western Australia Government Department of Water and Environmental Regulation

Tellus Holdings Ltd

September 2021

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ABBREVIATIONS

CAP	Compliance Assessment Plan
CAR	Compliance Assessment Report
CEO	Chief Executive Officer of Department of Water and Environmental Regulation, responsible for the administration of section 48 of the *Environmental Protection Act 1986* or their delegate
EP Act	*Environmental Protection Act 1986*
ha	Hectares
km	Kilometers
LLW	Low level radioactive waste
MS 1078	Ministerial Statement 1078
OEPA	Office of the Environmental Protection Authority
OFI	Opportunity for Improvement
PAG 1	OEPA document – Post Assessment Guideline No. 1 – Post Assessment Guideline for Preparing an Audit Table
PAG 3	OEPA document – Post Assessment Guideline No. 3 – Post Assessment Guideline for Preparing a Compliance Assessment Report
PAG 4	OEPA document – Post Assessment Guideline for Making Information Publicly Available
PER	Public Environmental Review
Tellus	Tellus Holdings Ltd
t	Tonnes
tpa	Tonnes per annum

EXECUTIVE SUMMARY

Tellus Holdings Ltd (Tellus or the Company) as the Proponent for the Sandy Ridge Facility was issued with Ministerial Statement No. 1078 (MS 1078) on 27 June 2018. MS 1078 allows Tellus to construct and operate a dual open cut kaolin clay mine and a near-surface geological waste repository accepting Class IV and Class V waste, approximately 75 kilometres northeast of Koolyanobbing in the Shire of Coolgardie, Western Australia.

This report has been prepared in accordance with Condition 4-6 of MS 1078 that requires Tellus to prepare and submit to the Department of Water and Environmental Regulation (DWER) a Compliance Assessment Report (CAR), 15 months from date of approval of MS 1078 and then annually from the date of submission of the first CAR, or as otherwise agreed in writing by the CEO. This is the third CAR to be submitted against the requirements of MS 1078 and has been prepared in accordance with the requirements of the *Post Assessment Guideline for Preparing an Audit Table, Post Assessment Guideline No. 1* (OEPA, 2012a) and the *Post Assessment Guideline for Preparing a Compliance Assessment Report, Post Assessment Guideline No. 3.* (OEPA, 2012c). The reporting period has been defined as from 27 June 2020 to 26 June 2021.

During the reporting period the facility accepted its first waste, on 6 July 2020. In ground emplacement commenced on 23 March 2021.

Tellus's overall compliance status with MS 1078 for the reporting period is summarised in Table ES-1.

Table ES-1 – Overall compliance status with MS 1078

Compliant Conditions	Completed Conditions	Not Required Conditions	Potentially Non-compliant Conditions	Non-compliant Conditions	In Process Conditions
50	38	26	0	3	0

Three non-compliant conditions were identified against the requirements of MS 1078 during the reporting period. Tellus consider the three non-compliances to have caused no material or serious harm to the environment. The non-compliant conditions were as follows:

- Condition 7-3.4 - The specific coordinates for the locations of each waste package stored in the waste cells and temporary storage area were not available.
- Condition 8-1.2 - The facility had not been managed in accordance with all regulatory requirements during the reporting period. An audit of the site Environmental Licence L9240-2020 identified 4 non-compliances, which were reported through the 2020/21 Annual Audit Compliance Report (AACR).
- Condition 13-7 - A certificate of currency for the insurance policy was not provided to the CEO on 1 July 2021. Discussions with Tellus personnel indicate that a certificate of currency for the insurance policy was not provided to the CEO by 1 July (however, it was confirmed that a current insurance policy was in place throughout the reporting period).

The Statement of Compliance is included in Appendix A.

A summary of the status of all conditions is outlined in the Compliance Assessment Audit Table (Appendix B).

1 INTRODUCTION

This Compliance Assessment Report (CAR) has been prepared to document compliance with Ministerial Statement No. 1078 (MS 1078) issued under the *Environmental Protection Act 1986* to Tellus Holdings Ltd (Tellus or the Company) to construct and operate a dual open cut kaolin clay mine and a near-surface geological waste repository known as the Sandy Ridge Facility (the Facility).

The Facility is licenced to accept Class IV and Class V waste and is located approximately 75 kilometres (km) northeast of Koolyanobbing, Western Australia (WA).

1.1 Background

In 2015 Tellus submitted a referral to the WA government to construct and operate an open-cut kaolin (clay) mine and complementary near-surface geological waste repository, accepting Class IV (Secure Landfill) and Class V (Intractable Landfill) waste, including waste from interstate and within Australia's Exclusive Economic Zone.

The Facility was granted WA government Ministerial Approval on 26 June 2018 (Ministerial Statement 1078). Tellus has approval to mine kaolin under the *Mining Act 1978* and store, treat and dispose of hazardous and intractable chemical and low-level radioactive waste materials under the *Environmental Protection Act 1986* (EP Act).

Up to 290,000 tonnes per annum (tpa) of kaolin clay will be mined and the mining voids will be used for the permanent isolation of wastes, including hazardous and intractable wastes, and low-level radioactive waste (LLW). The Facility will receive up to 100,000 tpa of Class IV and Class V waste for approximately 25 years. The Facility consists of:

- Mine infrastructure, including stockpile area, storage building, laboratory, mining offices, laydown yard, stormwater storage tanks (4), brine pond and settlement pond.
- Waste infrastructure including an inflatable dome waste cell cover, temporary waste storage areas (East Yard, PFAS contaminated waste storage area, low level radiation waste warehouse/ liquid waste unloading area, low level radiation waste, liquid waste and sludge storage yard), temporary waste storage area stormwater drains and retention pond, waste inspection area, waste immobilisation plant, workshop and laydown yard, flammable goods store, radiation scanner and waste laboratory.
- Other infrastructure including an accommodation camp, access roads, water pipelines, wastewater treatment plant, flood levee, and a putrescible landfill. The putrescible landfill services the accommodation camp and office. Only wastes generated at the Facility will be disposed in this landfill.

A Regional Location plan is presented as Figure 1-1 at the end of this Section. Monitoring locations at the Facility are presented in Figure 1-2.

1.2 Purpose and scope

This CAR is submitted in accordance with the requirements set out in Condition 4-6 of MS 1078, which requires the following:

Condition 4-6 – Compliance Reporting

The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO.

The Compliance Assessment Report shall:

(1) be endorsed by the proponent's CEO or a person delegated to sign on the CEO's behalf;
(2) include a statement as to whether the proponent has complied with the conditions;
(3) identify all potential non-compliances and describe corrective and preventative actions taken;
(4) be made publicly available in accordance with the approved Compliance Assessment Plan; and
(5) indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1.

The reporting period for this CAR has been defined as from 27 June 2020 to 26 June 2021. This CAR is based on Tellus' assessment of compliance with the conditions of MS 1078 and in accordance with the approved Compliance Assessment Plan (CAP), as required by Condition 4-2. The Facility's current CAP (V0) was approved by the Department of Water and Environmental Regulation (DWER) on 17 December 2018.

Table 1-1 describes the characteristics of the Project of MS 1078.

Table 1-1 – Key characteristics of proposal, Ministerial Statement No. 1078

Element	Description of Proposal
Sandy Ridge Facility	The proposal is to construct and operate a dual open cut kaolin clay mine and a near-surface geological waste repository accepting Class IV and Class V waste, approximately 75 kilometres northeast of Koolyanobbing.

Table 1-2 summarises the physical extent and operational limits of the Facility.

Table 1-2 – Extent of physical and operational limits

Element	Extent
Physical Elements	
Mine pits/waste cells	Clearing up to 202.3 hectares (ha) of native vegetation within a 1,061 ha development envelope
Associated infrastructure	Clearing up to 73.75 ha of native vegetation within a 1,061 ha development envelope
Operational Elements	
Class IV & V wastes accepted at gate	up to 100,000 tpa
Temporary waste storage on surface	up to 15,000 tonnes (t)
Maximum temporary storage time	up to 12 months
Waste (including treated waste) disposed to waste cells	up to 280,000 tpa
Water use	up to 0.18 Gigalitres per annum

1.3 Report methodology

This CAR has been prepared in accordance with the requirements of the Office of the Environmental Protection Authority (OEPA) *Post Assessment Guideline No.2 – Preparing a Compliance Assessment Report* (PAG 3) (OEPA, 2012c).

1.4 Retention of compliance assessments

Tellus will retain CARs (including all associated compliance assessments) and evidence used to verify compliance for the life of the proposal and then for a minimum of seven years after the end of the life of the proposal. Tellus will continue to implement the proposal until the CEO has determined all conditions of MS 1078 (including rehabilitation and decommissioning) have been satisfactorily addressed.

1.5 Public availability of reports

Tellus will make this CAR publicly available in accordance with the OEPA's Post Assessment Guideline No. 4 – Post Assessment Guideline for Making Information Publicly Available (PAG 4) (OEPA, 2012d). The CAR will be available on the Sandy Ridge Regulatory Information page of the Tellus website (www.tellusholdings.com) as per the 2018/2019 and 2019/2020 CARs.

1.6 Proposed changes to the compliance assessment plan

No changes were made to the CAP, required by Condition 4-1 of MS 1078, during the reporting period.

This section of subsequent CARs may include proposed changes to the CAP that were identified during the relevant reporting period. Proposed changes to the CAP for future reporting periods will be submitted to the CEO for approval as part of maintaining the CAP to the satisfaction of the CEO.

1.7 Format of the report

The format of this CAR is as follows:

- Chief Operating Officer's endorsement, including Tellus' statement of compliance.
- Executive Summary.
- Section 1 is an introduction and provides the scope and nature of the audit.
- Section 2 briefly describes the implementation status of the Facility during the reporting period.
- Section 3 summarises the compliance issues identified and provides corrective and preventative measures to improve the environmental performance at the Facility.
- Section 4 provides the limitations of the report.
- Section 5 provides references used in this CAR.

Appendix A is the Statement of Compliance against the requirements of MS 1078.

Appendix B is the Audit Table, a tabulated review of the audit results against the requirements of MS 1078.

Appendix C is the is the Compliance Status of Key Characteristics identified in Table 2, Schedule 1 of MS 1078.

This CAR provides a summary of findings including details of non-compliances identified during the audit and recommended actions to improve compliance status.

Figure 1-1 Sandy Ridge Facility Regional Location.

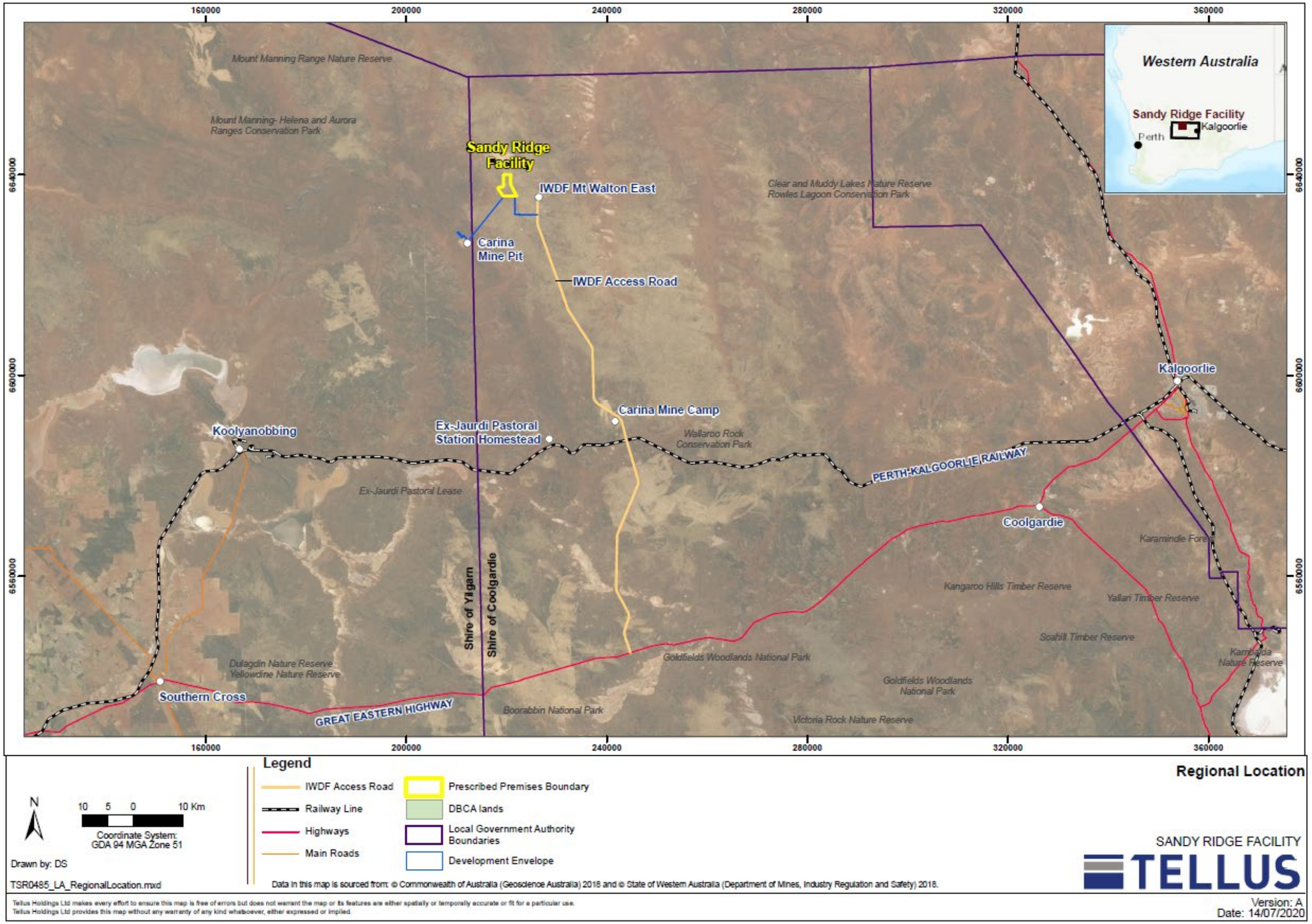
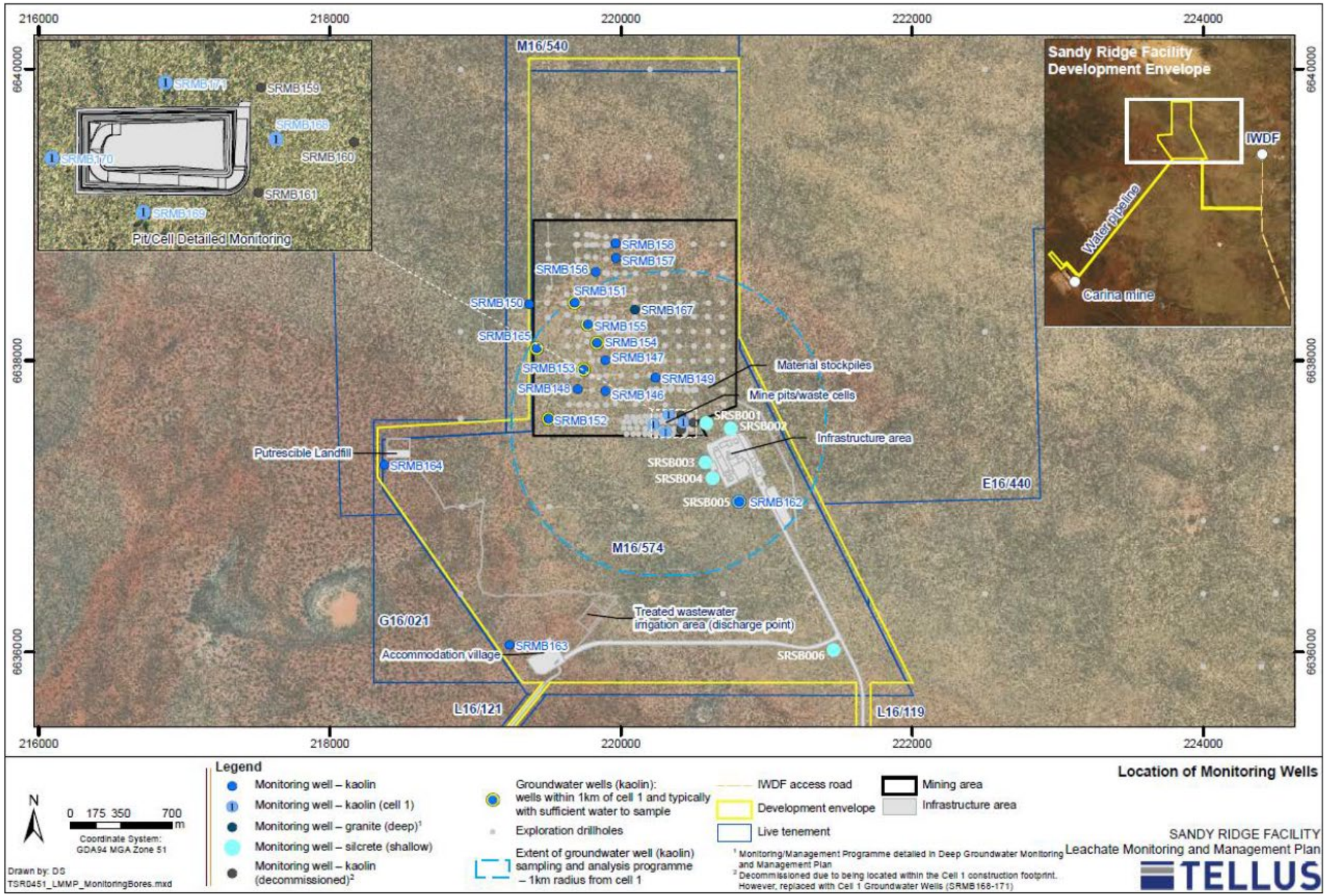


Figure 1-2 Sandy Ridge Facility Monitoring Stations.



2 IMPLEMENTATION STATUS

2.1 Approvals

Table 2-1 summarises the project approvals secured under the EP Act.

Table 2-1 – Approvals summary

Approvals	Issued	Finish
Ministerial Statement 1078 - Proposal to construct and operate a dual open cut kaolin clay mine and a near-surface geological waste repository accepting Class IV and Class V waste, approximately 75 kilometres north east of Koolyanobbing.	27/07/2018	
Section 45C – Attachment 1 to MS 1078 – Changes: • Amend the development envelope from 1004.2 hectares to 1061 hectares to allow for relocation of groundwater abstraction infrastructure • Installation of a 1.5 megawatt solar farm for power generation • Addition of two stormwater sumps on internal roads in the infrastructure area • Reduction in the width of internal roads to the Class II landfill and along the groundwater pipeline to Carina Iron Ore Mine • Addition of an access road adjacent to Mt Dimer Road • Addition of a flood levee • Change in orientation and size of accommodation camp	05/02/2019	
Ministerial Statement 1152 (Condition 13-11 Financial Assurance Requirements)	24/09/2020	
Major approvals, permits and licences from the Australian, WA and Local Government required to temporarily store waste on-site	-	29/06/2020
Site Registration – Controlled Waste Facility No. 39106650	-	21/01/2020
W6305/2019/1 – Works Approval #2 – to authorise the construction of the temporary waste storage area.	20/12/2019	19/12/2022
W6308/2019/1 – Works Approval #3 – to authorise the construction of the main processing and treatment infrastructure of the Facility.	07/02/2020	06/02/2023
Operating Licence – Surface storage licence (Cat. 61 liquid waste and 61A solid waste activities) – L9240/2020/1	29/06/2020	28/06/2040

Registration R2498/2019/1 was granted in November 2019 for the operation of the wastewater treatment plant, and registration R2501/2020/1 was granted in February 2020 for the premises domestic putrescible landfill.

2.2 Construction

The balance of works on Stage 2B was completed during the reporting period, consisting predominantly of commissioning and performance testing of Facility infrastructure. Contract completion occurred on 09 October 2020. There is a 12 months defects liability period that ends on 09 October 2021.

2.3 Operations

During the reporting period the facility accepted its first waste, on 6 July 2020. A total of 5956 tonnes was received on site during the reporting period. A breakdown by controlled waste type and radioactive waste

received during the reporting period (27 June 2020 and 26 June 2021) is detailed in Table 2-2 and Table 2-3 below.

Table 2-2 – Controlled waste accepted during reporting period

Waste Type	Normalised tonnes
A100 – Waste resulting from surface treatment of metals and plastics	18
A130 – Inorganic cyanide	0.2
B100 – Acidic solutions or acids in solid form	1.1
D120 – Mercury and mercury compounds	0.8
D130 – Arsenic and arsenic compounds	671
D140 – Chromium compounds	17
D210 – Nickel compounds	75
D220 – Lead and lead compounds	1,742
G110 – Non-halogenated organic solvents	0.02
H100 – Waste from the production, formulation or use of biocides and phytopharmaceuticals	9.6
H170 – Waste wood-preserving chemicals	2,079
J100 – Waste mineral oils unfit for their intended purpose	125
J160 – Waste tarry residues arising from refining, distillation or pyrolytic treatment	618
J180 – Oil sludge	54
M100 – Waste substances and articles containing polychlorinated biphenyls (PCBs)	39
M270 – Per- and poly- fluoroalkyl substance (PFAS) contaminated materials, including waste PFAS containing products and contaminated containers	404
N120 – Soils contaminated with a controlled waste	36
Total tonnes received during reporting period	**5890**

Table 2-3 – Radiation waste accepted during reporting period

Waste Type	Normalised tonnes
NORM soil samples	65
Exempt DSRS	0.2*
Exempt LLW	0.2*
Total tonnes received during reporting period	**66**

* Exempt DSRS and LLW received in same delivery, therefore total package weight divided by two.

During the reporting period, only one liquid waste has been treated through the Waste Isolation Plant (WIP) and disposed of to the waste disposal cell. This material was PFAS contaminated liquid waste. Treatment commenced on 18 May 2021 and a total of 87 tonnes of PFAS waste was treated in the WIP, producing 631 tonnes of solidified waste that was disposed of to the waste cell.

Permanent disposal to the waste cell commenced on 23rd March 2021. Permanently disposed waste during the reporting period is summarised in Table 2-4.

Table 2-4 – Permanently disposed waste during reporting period

Waste Type	Normalised tonnes
D130 – Arsenic trioxide (includes dolocrete)	137
J160 – Power Poles	1663
D220 – Lead and lead compounds	821
M270 – PFAS	698
Other	23
Total tonnes disposed of during reporting period	**3343**

2.4 Decommissioning

No decommissioning activities were conducted during the reporting period.

3 DETAILS OF DECLARED COMPLIANCE STATUS

Table 3-1 provides a summary of the performance categories in respect to the compliance status for each requirement of MS 1078 as defined in the OEPA *Post Assessment Guideline No. 1 – Post Assessment Guideline for Preparing an Audit Table* (PAG 1) (OEPA, 2012a, p.9).

Table 3-1 – Compliance status terms

Compliance Status Term	Acronym	Definition
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.
Not Required at this Stage	NR	The requirements of the audit element were not triggered during the reporting period.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the OEPA or another government agency for approval, that submission has been made and no further information or changes have been requested by the OEPA or the other government agency and assessment by the OEPA or other government agency for approval is still pending.

The overall status of compliance with the Conditions of MS 1078 for the reporting period is summarised in Table 3-2. Requirements considered non-compliant are summarised in Table 3-3. The Statement of Compliance as required by PAG 1 is provided in Appendix A.

Tellus has provided comments and evidence next to each requirement. Where considered relevant, observations have been made regarding specific compliance issues.

The Compliance Status of Key Characteristics is presented in Appendix C.

Table 3-2 – Overall compliance assessment of MS 1078

Number of Compliant Conditions	Number of Completed Conditions	Number of Not Required Conditions	Number of Potentially Non-compliant Conditions	Number of Non-compliant Conditions	Number of In Process Conditions
50	38	26	0	3	0

Table 3-3 – Summary of non-compliances with conditions of MS 1078

Audit Code	Subject	Requirement	Further Information
1078:P7.3.4	Waste Management System	Provide details about the waste characteristics, quantity, storage duration and specific coordinates for the location of each waste package stored in the waste cells and temporary storage area.	As detailed in the annual waste audit, records about the waste characteristics, quantity and storage duration were readily available. The audit identified that specific coordinates for the location of each waste package stored in the waste cells and temporary storage area was not fully recorded.
1078:P8.1.2	Independent Annual Audit	The proponent shall manage the implementation of the proposal to meet the following objectives: (1) that the facility is managed in accordance with all regulatory requirements.	An audit of the site Environmental Licence L9240-2020 identified 4 non-compliances, which were reported through the 2020/21 Annual Audit Compliance Report (AACR).
1078:M13.7	Insurance Policies	Each 1 July, and each time the Insurance Policies are renewed, the proponent must provide a certificate of currency or alternative evidence in a form acceptable to the CEO of the existence of the Insurance Policies.	Discussions with Tellus personnel indicate that a certificate of currency for the insurance policy was not provided to the CEO by 1 July.

3.1 Management plans

Table 3-4 summarises the management plans required by MS 1078 that were submitted to the CEO and their approval status during the reporting period.

Table 3-4 – Submitted and approved management plans

Condition No.	Management Plan	Date Prepared / Revised	Approval Date
9-2	Leachate Monitoring and Management Plan, VE[1]	7 May 2020	14 May 2020
10-5	Flora and Vegetation Management Plan, V1	19 June 2019	1 July 2019
11-2	Construction Fauna Management Plan, V1	13 June 2019	25 June 2019
12-1	Waste Facility Decommissioning and Closure Plan, V3	6 February 2020	27 February 2020

Condition 9-4(1), Condition 10-7(1), Condition 11-4(1) and Condition 12-3 of MS 1078 require Tellus to implement management plans, or any subsequent revisions as approved by the CEO. The following management plans and sub-plans/procedures were reviewed as part of this compliance assessment:

- Flora and Vegetation Management Plan.
  - Appendix E: Vegetation Clearance Procedure, Draft, February 2019
  - Appendix G: Bushfire Management Plan, V1, March 2019
  - Bushfire Risk Management Plan, V0, March 2019
  - Appendix H: Air Quality Management Plan, V0, March 2019
  - Appendix I: Construction Erosion and Sedimentation Management Plan, V0, March 2019
- Leachate Monitoring and Management Plan.
- Construction Environmental Management Plan / Fauna Management Plan.
- Waste Facility Decommissioning and Closure Plan.

3.2 Management plan implementation

Table 3-5 presents the findings of the review of implementation of required management plans.

Table 3-5 – Implementation review of management plans

Management Plan	Implementation Review
Leachate Monitoring and Management Plan, VE, 7 May 2020	The Leachate Monitoring and Management Plan (LMMP) has been prepared to address Condition 9-2 of MS 1078. Tellus submitted the LMMP to the CEO on 7 May 2020 who approved the plan in a letter to Tellus dated 14 May 2020. The LMMP has not been updated during the reporting period. Condition 9-4(1) requires Tellus to implement the LMMP, or any subsequent revisions. In addition to meeting the requirement of Condition 9-2 of MS 1078 the LMMP was prepared to meet following environmental objective "ensure that impacts to soil quality are minimised". Implementation of the LMMP is described below:

[1] E being the first approved version of this plan (i.e. Version 0).

Management Plan	Implementation Review
	• Twelve sampling events were undertaken to establish a baseline to establish trigger and threshold criteria. At the time of preparing this report the LMMP was being updated to reflect the results of the 12 GMEs and updated trigger and threshold levels. • Biannual sampling against the parameters defined in Appendix H1 and H2 of the LMMP has been undertaken. The Summary Groundwater Monitoring Event 1 (Summary Letter Report) indicates that due to water levels and distances of some monitoring wells from current waste cells only six shallow groundwater bores met the requirements to be sampled in April 2021. The results indicated the following • Multiple metals and nutrients were detected in all samples. • Metals and nutrients are present naturally in the environment. • Metals and Nutrients have been detected in past groundwater monitoring events at similar concentrations. Analysis of the data also indicated the presence of Polyfluoroalkyl Substances (PFAS) at levels as low as 0.0002 µg /L. It is likely that these levels of PFAS has been caused by the development of the wells and sampling and are not indicative of leaching from the waste cells. • Tellus installed and monitored four groundwater bores around the perimeters of Pit 1/Cell 1 for the presence of water.
Flora and Vegetation Management Plan, V1 19 June 2019	The Flora and Vegetation Management Plan (FVMP) was prepared to address Condition 10-6 of MS 1078. Tellus submitted the FVMP to the CEO on 19 June 2019 who approved plan on 1 July 2019. Condition 10-7(1) requires Tellus to implement the FVMP, or any subsequent revisions. Implementation of the FVMP is described below. The FVMP references the following documents as controls for flora and vegetation management. Therefore, implementation of these subordinate documents, with regards to impacts to flora and vegetation, have also been assessed against this condition: • Appendix E: Vegetation Clearance Procedure, Draft, 28th February 2019. • Appendix G: Bushfire Management Plan, V1, March 2019. • Appendix H: Air Quality Management Plan, V0, March 2019. • Appendix I: Construction Erosion and Sedimentation Management Plan, V0, March 2019. The following are the controls defined in the FVMP to avoid direct impacts and manage indirect impacts on *Calytrix creswellii, Lepidosperma lyonsii*,and the "undescribed *Lepidosperma sp."* where practicable. **Avoid direct disturbance of conservation significant flora species.** The FVMP allows for the removal of up to 276.05 Hectares (ha) native vegetation within a 1,061 ha development envelope broken down as follows: • A maximum of 202.3 ha of native vegetation may be cleared for mine pits/waste cells. • A maximum of 73.75 ha of native vegetation may be cleared for associated infrastructure. • A total of 2.08 ha of vegetation was cleared during the reporting period. • Since construction activities commenced a total of 92.85 ha has been cleared in the development area. Tellus manages clearance of native vegetation through a Permit to Work system. A total of one Vegetation Clearance Permits was issued by Tellus during the reporting period. The Tellus permits are maintained in the INX InControl module (INX SR-REG-003). The permit requires an assessment that the clearing has regard for the following clearing principles: • Avoid the clearing of native vegetation • Minimise the amount native vegetation to be cleared; and • Reduce the impact of clearing on any environmental value.

Management Plan	Implementation Review
	The Clearing Permit identified that these principles had been applied. The Vegetation Clearing Procedure (SR-08.503) includes the requirement to hold a pre-clearing meeting (for contractors/ personnel conducting clearing) to ensure that the clearing plan is understood by relevant personnel Clearing commenced only after pre-clearing inspections were conducted. The following requirements of the procedure were also met: • Locations of conservation significant flora were recorded in GIS. • Approved clearing polygons and the as-cleared polygons are recorded in GIS. • Clearing records are maintained in the Clearing Permit Register in INX InControl. • Any unauthorised clearing records are maintained in the INX InControl module (no unauthorised clearing occurred in the reporting period). Pre-clearing inspections were conducted, there were no further records of identified flora species referenced in the FVMP as being present. **Prevent the introduction and spread of weeds.** No weed species were recorded within the development envelope during pre-development field surveys and the Western Botanical Condition Assessment survey of *Lepidosperma sp* colonies in September 2020 did not identify any weeds in the vicinity of the colonies. Monthly area inspections are progressively undertaken across site, including all disturbance areas and stockpiles for weeds. These inspections are recorded in INX InControl. During the reporting period weeds were detected at the accommodation camp and these were removed. Subsequent inspections in the reporting period had detected no further weeds. **Conservation Species Condition Monitoring** Vegetation and conservation significant species condition monitoring – Quarterly during construction then annually in Spring during operations. Construction activities ceased in October 2020, after which the monthly contractor environmental reports ceased. A condition assessment of identified subject and control groups of *Lepidosperma sp* was undertaken by Western Botanical (botanical specialist) in June and September 2020. No variance was identified between the controls and subject groups, with all being classified as 'vegetative'; largely a result of pre-existing and dry seasonal conditions which had prevailed for the prior 3-4 years. **Prevent the incidents of bushfires** The Bushfire Management Plan was developed in accordance with State Planning Policy 3.7 Planning in Bushfire Prone Areas, as required by the Development Application to the Shire of Coolgardie. It was updated during the reporting period. At the time of reporting the most recent version was V3, dated 27 June 2019. A Bushfire Risk Management Plan, V0, dated 19 March 2019 was appended to the Bushfire Management Plan. The requirements of the Bushfire MP had been largely met. Given the Bushfire Management Plan and Bushfire Risk Management Plan do not include requirements specific to flora or vegetation, Tellus proposes the following improvement actions: • Detach the Bushfire Management Plan and Bushfire Risk Management Plan from the FVMP. • Include the requirement to meet the requirements of the current Bushfire Management Plan. **Protect air quality** The Western Botanical Condition Assessment survey did not indicate that dust deposition was impacting the *Lepidosperma sp* colonies. The Air Quality Management Plan (AQMP) is not an MS 1078 required document but was appended to the approved FVMP, V1, 2019. The AQMP was developed to manage air quality-related impacts associated with the construction of the facility and outlines potential risks to air quality and mitigation/management measures that will be implemented to

Management Plan	Implementation Review
	ensure that air quality impacts are as low as reasonably practicable during construction activities. Upon review of the AQMP Tellus considers the impacts of air quality on flora and vegetation to be suitably addressed in the FVMP. Tellus proposes the following improvement actions: • Detach the AQMP from the FVMP during the current revision of FVMP. • Ensure that air mitigation measures concerning flora and vegetation are included in the revised FVMP. Reporting The FVMP includes the requirement to prepare a monthly environmental report in relation to compliance with environmental management controls on site. Including results of inspections and monitoring and identify any improvement opportunities or non-conformances. Monthly reports had been prepared for the reporting period and corrective actions had been managed via INX InControl.
Construction Environmental Management Plan [Fauna Management Plan], V1, 13 June 2019	It is noted that Tellus renamed the Construction Environmental Management Plan the Construction Fauna Management Plan (CFMP) in agreement with DWER to address Condition 11-2 of MS 1078. Tellus prepared the CFMP and submitted it to the CEO on 13 June 2019. The CEO approved the CFMP on 25 June 2019. Condition 11-4(1) requires Tellus to implement the CFMP, or any subsequent revisions. Implementation of the CFMP is described below: • Pre-clearing inspections were conducted. • Clearing records are maintained in the Clearing Permit Register in INX InControl. • The INX InControl module is used to log events of sightings/mortalities for trends in location of sighting or mortality or reason of mortality. One mortality event occurred during the reporting period on 12 January 2021 (INX Ref: 2398). The event was a dead juvenile Black Swan found in the yard containment pond.
Waste Facility Decommissioning and Closure Plan, V3, 6 February 2020	The Waste Facility Decommissioning and Closure Plan (WFDCP) has been prepared to address Condition 12-1 of MS 1078. Tellus submitted the WFDCP to the CEO on 6 February 2020 who approved the plan in a letter to Tellus dated 27 February 2020. The WFDCP has not been updated during the reporting period. Condition 12-3 requires Tellus to implement the WFDCP, or any subsequent revisions. The WFDCP objectives will be implemented over three phases: • Phase I –Will consist of receiving, handling, and emplacing Class IV and Class V intractable waste in the near-surface geological repository (i.e. cells) for permanent isolation and will occur over the next 25 year period. • Phase II – The Facility will be prepared for permanent closure. • Phase III – The implementation of active and passive institutional controls. The first scheduled activity under the WFDCP will occur in Phase I and is the progressive closure of waste cells including tasks such as cell cap design verification, plant species investigation followed by backfilling and capping of each cell. Given the first cell was still in use, implementation of the WFDCP is expected to commence in approximately 2022.

3.3 External audits

The Department of Water and Environmental Regulation (DWER) conducted an inspection on 28 July 2020 against the requirements of the Environmental Licence L9240/2020/1. The scope included assessing the operational and regulatory controls in place to manage and mitigate environmental impacts but did not specifically cover requirements of MS 1078. No material issues were identified at the time of the inspection.

4 LIMITATIONS OF THIS REPORT

This Report has been prepared by Tellus Holdings Ltd (Tellus) based on generally accepted practices and standards and information (including site conditions) available/present when it was prepared (in September 2021).

No other warranty, expressed or implied, is made as to the professional advice included in this Report. This Report was prepared in accordance with the purpose outlined in Ministerial Statement 1078, dated 27 June 2018.

Where this Report indicates that information has been provided to Tellus by third parties, Tellus has made no independent verification of this information except as expressly stated in the report. Tellus assumes no liability for any inaccuracies in or omissions to that information. This Report should be read in full.

5 REFERENCES

5.1 Supporting, verifying information, documentation

[01] Tellus, 2020, 2019/2020 Compliance Assessment Report (Ref.GRACE-552978189)	Report
[02] Tellus, 2018, Sandy Ridge Compliance Assessment Plan, 29/11/2018, Ref: HS00-1760150200/TSR-5-HO-0220-AP-PLN-0001, V0.	Plan
[03] Transmittal No.: THL001-000413, Subject: MS 1078 Sandy Ridge Facility - Compliance Assessment Plan, 29/11/2018.	Plan
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5.2 External references

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Appendix A – Statement of Compliance

Appendix B – MS 1078 Audit Table

Appendix C – Compliance Status of Key Characteristics

Table C-1 – Compliance status of key characteristics, Table 2, Schedule 1 MS 1078

Audit Code	Subject	Requirement		Status	Further Information
1078:M1.1	Proposal Implementation	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.		Compliant	The authorised extent of the proposal was not exceeded during the reporting period.
		Key Characteristic	**Description**		
		Mine pit/waste cells	Clearing up to 202.3 hectares of native vegetation within a 1,061 ha development envelope	Compliant	As of 26 June 2021, a total of 23.0 [3]hectares of native vegetation within the development envelope had been cleared for mine pit/waste cells.
		Associated infrastructure	Clearing up to 73.75 hectares of native vegetation with a 1,061 ha development envelope	Compliant	As of 26 June 2021, a total of 71.93 [4]hectares of native vegetation within the development envelope had been cleared for associated infrastructure.
		Class IV & V waste accepted at gate	up to 100,000 tonnes per annum	Compliant	A total of 5956 tonnes (normalised) of waste was received during the reporting period.
		Temporary waste storage on surface	up to 15,000 tonnes	Compliant	A total of 5956 tonnes (normalised) of waste was received during the reporting period; therefore, the temporary storage quantity was not exceeded.
		Maximum temporary storage time	up to 12 months	Compliant	Waste was first received on site on 6th July 2020; therefore, the 12 month storage requirement was not exceeded during the reporting period.
		Waste (including treated waste) disposed to waste cells	up to 280,000 tonnes per annum	Compliant	A total of 3343 tonnes (normalised) of waste was permanently disposed of during the reporting period.
		Water use	up to 0.18 gigalitres per annum	Compliant	A total of 0.05 gigalitres was used on site during the reporting period.

[3] Note: The mine pit/ waste cells clearing area is less than reported last year (35.9 ha) due to last year's CAR mistakenly including clearing for exploration and firebreaks, which are exempt, and have now been removed.
[4] Note: The associated infrastructure clearing area is less than reported last year (72.6 ha) due to last year's CAR mistakenly including exploration clearing and firebreaks, which are exempt, and have now been removed.