SANDY RIDGE Compliance Assessment Report 2024-25

Ministerial Statements 1078 and 1152

Prepared for

Western Australia Government Department of Water and Environmental Regulation

Prepared by:

Tellus Holdings Ltd
Suite 2, Level 10, 151 Castlereagh Street, Sydney, NSW 200, Australia
T +61 2 8957 3395 www.tellusholdings.com
ABN 97 138 119 829

Tellus is certified to AS/NZS ISO 9001, AS/NZS ISO 4001 and AS/NZS45001.

Tellus Holdings Ltd

4/09/2025

This page has been left blank intentionally.

QUALITY INFORMATION

Document:	Sandy Ridge Compliance Assessment Report No.7 – 2024/2025
Status:	Final
Prepared for:	Western Australia Government Department of Water, Environment and Regulation
Ref:	HS00-1760150200-22284
Date:	22/09/2025

Prepared by:	Nick Croston – KASA Consulting
Reviewed by:	Nathan Jardine – Tellus Environmental Manager
Approved by:	Pascoe Murison– Sandy Ridge Chief Operating Officer

REVISION HISTORY

Page No.	Details	Version	Date

This page has been left blank intentionally.

TABLE OF CONTENTS

List of Appendices

List of Tables

List of Figures

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
CFMP	Construction Fauna Management Plan
DGMMP	Deep Groundwater Monitoring and Management Plan
DWER	Department of Water and Environmental Regulation
EP Act	Environmental Protection Act 1986
ERD	Environmental Review Document
FMP	Fauna Management Plan
FVMP	Flora and Vegetation Management Plan
GIS	Geographic Information System
GME	Groundwater Monitoring Event
ha	Hectares
LLW	Low level radiological waste
LMMP	Leachate Monitoring and Management Plan
MS 1078	Ministerial Statement 1078
MS 1152	Ministerial Statement 1152
MS 1234	Ministerial Statement 1234
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
PFAS	Per- and poly- fluoroalkyl substance
SRF	Sandy Ridge Facility
Tellus	Tellus Holdings Ltd
t	Tonnes
tpa	Tonnes per annum
WFDCP	Waste Facility Decommissioning and Closure Plan

EXECUTIVE SUMMARY

Tellus Holdings Ltd (Tellus or the Company) as the Proponent for the Sandy Ridge Facility was issued Ministerial Statement 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, which requires Tellus to prepare and submit to the Department of Water and Environmental Regulation (DWER) a Compliance Assessment Report (CAR), 15 months from the 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 seventh 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 is from 31 June 2024 to 1 July 2025.

It is noted that following Tellus's submission of a Section 38 referral to the Environmental Protection Authority (EPA), seeking to align the gate limit with the approved disposal volume, Ministerial Statement 1234 (MS 1234) was issued on 13 December 2024, superseding MS 1078 and MS 1152. As MS 1234 includes a requirement that the Compliance Assessment Plan (CAP) is not submitted for at least six months following the issuing of MS 1234 this CAR has been prepared in accordance with MS 1078, against the approved MS 1078 CAP. To inform DWER of Tellus' compliance status with applicable conditions of MS 1234, this CAR has also included a brief summary of key findings against MS 1234 (Section 4).

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
61	34	16	0	3	7

Three non-compliant conditions were identified against the requirements of MS 1078 during the reporting period. Tellus consider that these non-compliances have not caused material or serious harm to the environment. The non-compliant conditions were as follows:

- Condition 1-1 The authorised extent of the proposal, as defined in Table 2 of Schedule 1 of MS 1078 has been exceeded in the reporting period, regarding the maximum temporary storage time of 12 months.
- Condition 8-1(2) Two site inspections by DWER identified 8 non-compliances against the Environmental Licence L9240-2020, three non-compliances against MS 1078 (the three listed here) and one non-compliance against the Environmental Protection Act.
- Condition 7-3 (4) The annual waste audit identified that records of waste characteristics, quantity and storage duration were readily available; however, as identified during the current and previous annual waste audits, specific coordinates for the location of each waste package stored in the waste cell and temporary storage area was not accurately recorded, except for radiological waste and some highly hazardous wastes.

  Although Tellus was technically non-compliant with this Condition during the reporting period; with the issuing of MS 1234 in December 2024 it is no longer a requirement to record specific coordinates

for the location of each waste package. DWER issued a formal letter of non-compliance on 25 January 2025; however, this stated that 'Non-compliance with Condition 7-3 (4) has been resolved by a Ministerial Statement amendment as requested by Tellus Holdings Ltd on 8 September 2023, and no further actions are required for this non-compliance.'

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) documents the compliance status with Ministerial Statement 1078 (MS 1078) issued to Tellus under the *Environmental Protection Act 1986* to construct and operate a dual open cut kaolin clay mine and a near-surface geological waste repository, the Sandy Ridge Facility (the Facility). This CAR also addresses Ministerial Statement No. 1152 (MS 1152) which amended Condition 13 of MS1078 by adding Condition 13-11 regarding Financial Assurance Requirements.

It is also noted that following Tellus's submission of a Section 38 referral to the Environmental Protection Authority (EPA) seeking to align the gate limit with the approved disposal volume, Ministerial Statement 1234 (MS 1234) was issued on 13 December 2024, superseding MS 1078 and MS 1152. As MS 1234 includes a requirement that the Compliance Assessment Plan (CAP) is not submitted for at least six months following the issuing of MS 1234 this CAR has been prepared in accordance with MS 1078, against the approved MS 1078 CAP. The CAR for 2025-26 will be against the approved CAP for MS 1234.

1.1 Background

In 2015, Tellus referred a proposal to the Western Australian Government to develop and operate an open-cut kaolin (clay) mine with a complementary near-surface geological repository for the permanent isolation of Class IV (Secure Landfill) and Class V (Intractable Landfill) waste, including waste from interstate and Australia's Exclusive Economic Zone. The Facility is located approximately 75 kilometres (km) northeast of Koolyanobbing, Western Australia (WA) (see Fig 1-1).

The Sandy Ridge Facility was granted State approval under Ministerial Statement 1078 (MS 1078) on 26 June 2018 pursuant to the Environmental Protection Act 1986 (EP Act), and Federal approval under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC 2015/7478) on 7 January 2019. MS 1234 was issued on 13 December 2024, which supersedes MS 1078 and MS 1152.

The Facility is licensed under Environmental Licence L9240/2020/1 (expiring 28 June 2040), which authorises:

- Acceptance of up to 100,000 tpa of solid and liquid waste under Categories 61 and 61A.
- Disposal of authorised waste types—including hazardous, intractable, and low-level radiological waste (LLW)—within licensed landfill categories 65 and 66 (Class IV Secure and Class V Intractable landfills).

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 (Per- and poly- fluoroalkyl substance) 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 (WIP), Air Pollution Control Residue (APCr) conditioning facility, workshop and laydown yard, flammable goods store, radiation scanner and waste laboratory. A licence amendment was granted in March 2025 authorising a Homogenising Tank and Waste Neutralisation Plant, however the installation of this additional liquid waste processing infrastructure was still in progress at the end of the 2024-2025 reporting period.
- Other infrastructure includes an accommodation camp, access roads, water pipelines, wastewater treatment plant, flood levee, and a putrescible landfill for site-generated waste.

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.

Figure 1-1 Sandy Ridge Facility Regional Location.

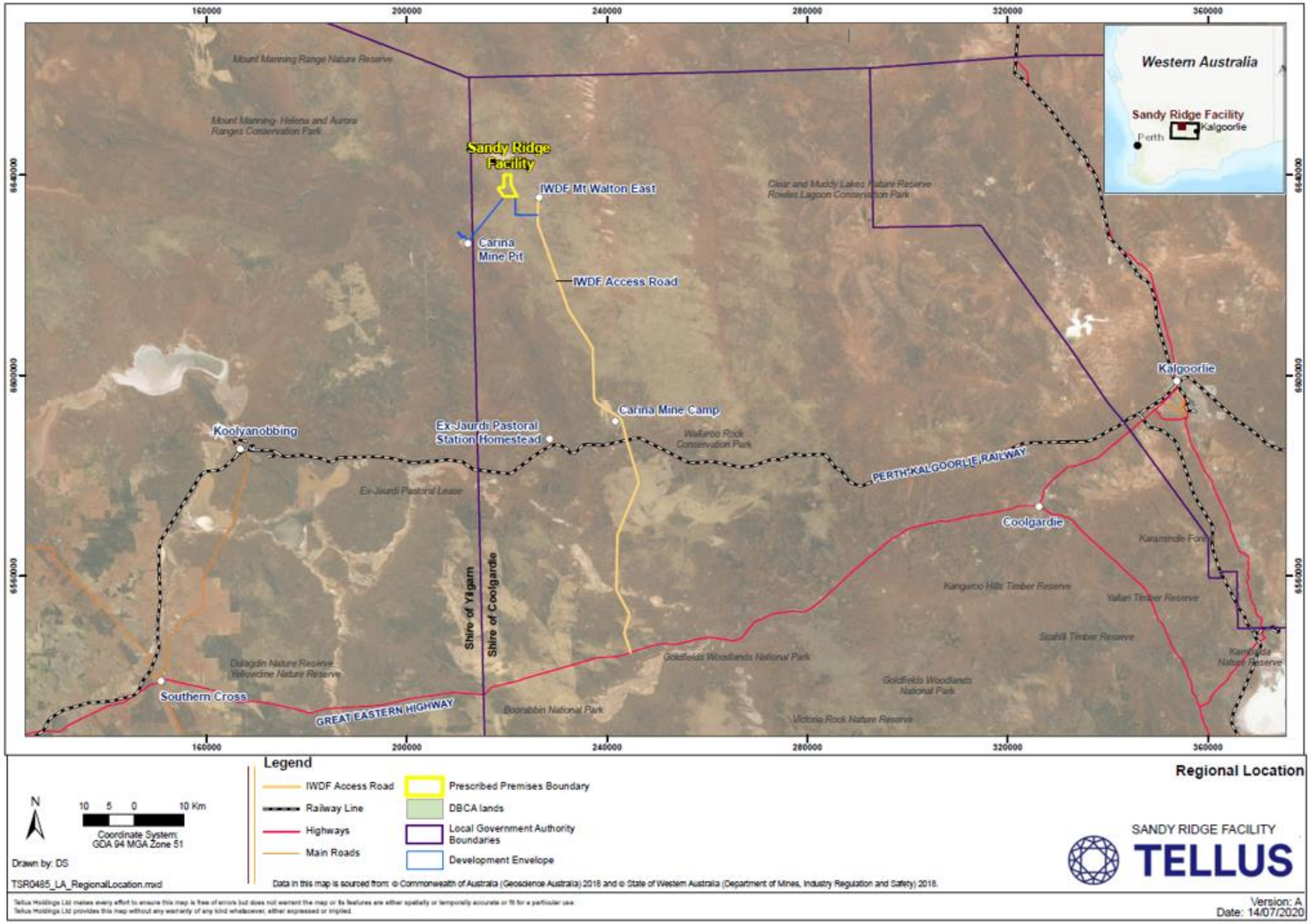
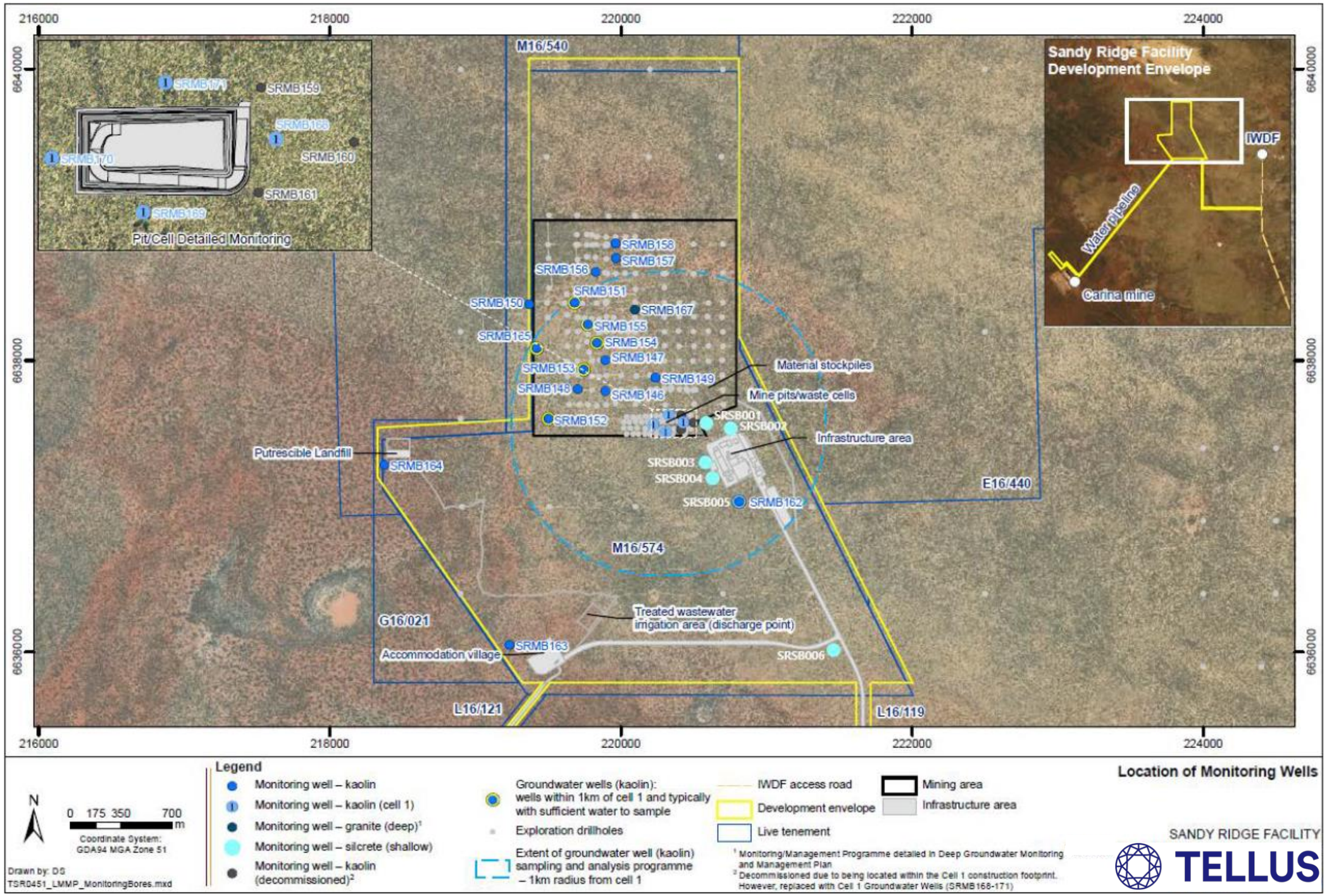


Figure 1-2 Sandy Ridge Facility Monitoring Stations.



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 is from 1 July 2024 to 30 June 2025, based on approval received from DWER (ref. DWERA-001158) to align reporting dates for the annual waste audit and CAR with the Annual Environment Report. 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 north east of Koolyanobbing in the Shire of Coolgardie over 25 years.

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

Table 1-2 – Extent of physical and operational limits specified in MS 1078

Element	Extent
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
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).

Appendix A of the approved Tellus CAP v0 (2018) includes a table of audit elements derived from MS1078 which form the basis of items reported against in this CAR.

1.4 Retention of compliance assessments

Tellus will retain all 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 of DWER 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). This CAR will be available on the Sandy Ridge Regulatory Information page of the Tellus website (www.tellusholdings.com) as per previous 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.

It is noted that Condition D 2-5 of MS 1234 (issued on 13 December 2024) requires that a CAP is submitted at least six months after MS 1234 is issued; therefore, the next CAR for the reporting period 2025-26 will be prepared against a CAP based on MS1234.

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 1.2 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 a summary of key findings against applicable elements of MS1234.
- Section 5 provides the limitations of the report.
- Section 6 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.

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 - Published.	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 to authorise the construction of the temporary waste storage area.	20/12/2019	19/12/2022
W6308/2019/1 – Works Approval to authorise the construction of the main processing and treatment infrastructure of the Facility.	07/02/2020	06/02/2023
Licence L9240/2020/1 – Surface storage licence (Cat. 61 liquid waste and 61A solid waste activities) granted.	29/06/2020	28/06/2040
Licence L9240/2020/1 – Amendment to increase above-ground storage from 3,000 tonnes to 10,000 tonnes utilising the Non-radioactive Waste Inspection and Unloading Warehouse, Low Level Radiation Warehouse, Flammable Goods Store and East Yards Part 1 and 2 constructed under Works Approval W6308/2019/1.	10/09/2020	28/06/2040
Licence L9240/2020/1 – Amendment to increase above-ground storage from 10,000 tonnes to 15,000 tonnes.	01/12/2020	28/06/2040
Licence L9240/2020/1 – Amendment to include prescribed premises categories 65 & 66 (waste cells), increase waste throughput tonnages and to authorise operation of the Waste Immobilisation Plant.	19/03/2021	28/06/2040
W6700/2022/1 – Works Approval to construct three additional waste cells, to be known as Cell 2, Cell 3 and Cell 4.	13/12/2022	13/12/2027
Licence L9240/2020/1 – Amendment to Surface storage licence (Cat. 61 liquid waste and 61A solid waste activities) – L9240/2020/1. authorise the treatment of liquid waste outside of the Waste Immobilisation Plant in portable liquid waste treatment equipment; and replacing the requirement for an achieved compaction density of ≥0.5 MPA unconfined compressive strength (UCS) to 90% of Maximum Modified Dry Density using Clegg Impact Value.	01/06/2023	28/06/2040
Licence L9240/2020/1 – Amendment to authorise the conditioning of APCr.	8/10/2024	28/06/2040
Ministerial Statement 1234 published.	13/12/2024	13/12/2049

Approvals	Issued	Finish
Amendment to authorise neutralisation of acidic and basic wastes in the Waste Neutralisation Plant, and use of the Homogenising Tank to homogenise stratified liquid wastes prior to transfer to the WIP.	18/03/2025	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

During the reporting period preliminary construction activities commenced for cell 2; including clearing of vegetation and construction of footings.

2.3 Operations

2.3.1 Waste accepted during the reporting period

During the reporting period the facility was fully operational and received a total of 62,637.58 tonnes of chemical waste, 875.41 tonnes and 1kL of radiological waste and 880 sealed radioactive sources. A breakdown by controlled waste type and radioactive waste received during the reporting period (1 July 2024 and 30 June 2025) is detailed in Table 2-2 and Table 2-3 below. A detailed breakdown of radiological waste received during the reporting period is provided in the 2024/25 Annual Environment Report (AER) and a full inventory of received and disposed of radiological waste is reported monthly to the Department of Health.

Table 2-2 – Controlled waste accepted during reporting period

Waste Type	Tonnes (Normalised)
A130 – Inorganic cyanide	13.42
B100 – Acidic solutions or acids in solid form	153.68
C100 - Basic (alkaline) solutions or bases (alkalis) in solid form	37.14
D110 - Inorganic fluorine compounds (excluding calcium fluoride)	6.11
D120 – Mercury and mercury compounds	333.9
D130 – Arsenic and arsenic compounds	567.26
D140 - Chromium compounds	19.15
D150 - Cadmium and cadmium compounds	2.85
D180 - Thallium and thallium compounds	0.13
D190 - Copper compounds	163.88
D210 – Nickel compounds	2,558.48
D220 – Lead and lead compounds	1,836.92
D230 - Zinc compounds	0.99
D300 - Non-toxic salts	30,232.4
D330 – Inorganic sulphides	226.25
E100 - Waste containing peroxides excluding hydrogen peroxide	0.64
E130 - Highly reactive chemicals not otherwise specified	37.98
H100 – Waste from the production, formulation or use of biocides and phytopharmaceuticals	347.57

Waste Type	Tonnes (Normalised)
H130 – Organochlorine pesticides	4,119.77
H170 – Waste wood-preserving chemicals	2,363.54
J100 – Waste mineral oils unfit for their intended purpose	73.3
J120 - Waste oil and water mixtures or emulsions, and hydrocarbon and water mixtures or emulsions	13.63
J160 – Waste tarry residues arising from refining, distillation or pyrolytic treatment	10,674.44
J180 - Oil sludge	237.67
M100 – Waste substances and articles containing polychlorinated biphenyls (PCBs)	203.81
M130 - Non-halogenated organic chemicals	4.07
M160 – Organohalogen compounds not listed elsewhere (e.g. CFCs)	33.99
M220 – Isocyanate compounds	51.34
M250 – Surfactants and detergents	26.35
M260 – Highly odourous organic chemicals including mercaptans and acrylates	30.14
M270 – Per- and poly- fluoroalkyl substance (PFAS) contaminated materials, including waste PFAS containing products and contaminated containers	1,134.48
N100 - Containers or drums contaminated with residues of a controlled waste	1.56
N120 – Soils contaminated with a controlled waste	1,237.04
N140 - Fire debris or fire wash waters	15.01
N150 - Fly ash excluding fly ash generated from Australian coal fired power stations	5,844.31
N160 - Encapsulated, chemically fixed, solidified or polymerised controlled wastes	0.86
N190 - Filter cake containing a controlled waste	5.92
N205 – Industrial waste treatment plant residues	23.5527
T100 - Waste chemical substances arising from research and development or teaching activities	0.59
Total tonnes received during reporting period	62,637.58

Table 2-3 – Radiation waste accepted during reporting period

Waste Type	Tonnes
Unsealed radioactive material	875.41
Disused sealed radioactive sources	880 units (weight negligible)

2.3.2 Waste permanently disposed during the reporting period

A total of 67,892.34 tonnes of chemical waste 1150.66 tonnes of radiological waste was permanently disposed of to Waste Cell 1, as summarised in Table 2-4 (by waste code) and Table 2-5.

The Waste Immobilisation Plant (WIP) operated consistently during 2024-2025, producing 7,018 tonnes of solidified waste across 47 batches. Liquid wastes that were not suitable for processing in the WIP were treated using portable mixing equipment, including open-topped intermediate bulk containers (IBCs) and half-height containers. During 2024-2025, twenty-eight (28) batches of liquid waste were processed using portable mixing equipment.

On 21 January 2025 the first Disused Sealed Radioactive Sources (DSRS) disposal event occurred, with 12 DSRS disposed of into a vertical cement chamber in cell 1. All 12 of the DSRS were exempt sources so did not require a disposal application from the regulator (Radiological Council WA).

Table 2-4 – Permanently disposed of chemical waste during reporting period

Waste Type	Tonnes
A130 – Inorganic cyanide	1.67
B100 – Acidic solutions or acids in solid form	20.78
C100 – Basic (alkaline) solutions or bases (alkalis) in solid form	9.43
D110 – Inorganic fluorine compounds (excluding calcium fluoride)	20.27
D120 – Mercury and mercury compounds	196.01
D130 – Arsenic and arsenic compounds	558.92
D190 – Copper compounds	4.31
D210 – Nickel compounds	2550.13
D220 – Lead and lead compounds	1872.44
D230 – Zinc compounds	0.99
D300 – Non-toxic salts	30155.18
D330 – Inorganic sulphides	169.22
E100 – Waste containing peroxides excluding hydrogen peroxide	0.82
E130 – Highly reactive chemicals not otherwise specified	18.03
H100 – Pesticides	1325.82
H130 – Organochlorine pesticides	5418.81
H170 – Waste wood-preserving chemicals	2305.15
J100 – Waste mineral oils unfit for their intended purpose	81.57
J120 – Waste oil and water mixtures or emulsions, and hydrocarbon and water mixtures or emulsions	6.89
J160 – Waste tarry residues arising from refining, distillation or pyrolytic treatment	10779.15
J180 – Oil sludge	185.61
M100 – Waste substances and articles containing polychlorinated biphenyls (PCBs)	89.34
M130 – Non-halogenated organic chemicals	5.07
M220 – Isocyanate compounds	35.25
M270 – Per- and poly- fluoroalkyl substance (PFAS) contaminated materials, including waste PFAS containing products and contaminated containers	2430.52
N100 – Containers or drums contaminated with residues of a controlled waste	1.59
N120 – Soils contaminated with a controlled waste	731.44
N150 – Fly ash excluding fly ash generated from Australian coal fired power stations	4733.02
N205 – Industrial waste treatment plant residues	4184.34
Total tonnes disposed of during reporting period	**67,892.34**

Table 2-5 – Permanently disposed of radiological waste during reporting period

Receival Date	Disposal Date	Waste Type	Weight (tonnes)
4/05/2024	29/11/2024	Contaminated soil from remediation project	33.21
4/06/2024	12/12/2024	LLW - Smelter factory bricks	20.37
19/06/2024	12/12/2024	LLW - Smelter factory bricks	15.17
1/07/2024	12/12/2024	LLW - contaminated smelter dust	57.35
1/07/2024	12/12/2024	LLW - contaminated bulka bags	3.97
30/09/2024	12/12/2024	LLW - contaminated smelter dust	12.97
4/06/2024	14/12/2024	LLW - Smelter factory bricks	20.37
19/06/2024	14/12/2024	LLW - Smelter factory bricks	15.17
4/05/2024	24/01/2025	Contaminated soil from remediation project	170.37
22/06/2024	24/01/2025	Contaminated soil from remediation project	90.16
2/07/2024	24/01/2025	Contaminated soil from remediation project	74.53
26/05/2021	25/01/2025	Contaminated soil	45
26/05/2021	25/01/2025	Contaminated soil	45
31/05/2021	25/01/2025	Contaminated soil	6
31/05/2021	25/01/2025	Contaminated soil	6
31/07/2024	25/01/2025	Contaminated soil from remediation project	19.04
1/08/2024	25/01/2025	Contaminated soil from remediation project	90.38
26/10/2024	25/01/2025	Contaminated soil from remediation project	390.6
23/08/2024	6/02/2025	SCO Mineral sands tanks	10.12
27/10/2024	10/02/2025	Contaminated soil from remediation project	9.78
15/11/2024	15/02/2025	5x200L drums - NORM cont. soil	0.35
23/08/2024	16/02/2025	LSA mineral sands	6.29
8/03/2021	19/02/2025	NORM Drill samples	1.05
8/03/2021	19/02/2025	Unsealed Radioactive Waste (under 30 Bq/g)	1.05
19/08/2021	16/03/2025	Pigging wastes	0.391
25/01/2022	15/05/2025	SCO filter and NORM sludge from oil and gas industry	5.965
Total tonnes disposed during the reporting period			**1150.66**

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 Audit Elements	Number of Completed Audit Elements	Number of Not Required Audit Elements	Number of Potentially Non-compliant Audit Elements	Number of Non-compliant Audit Elements	Number of In Process Audit Elements
61	34	16	0	3	7

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

Audit Code	Subject	Requirement	Finding
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.	The authorised extent of the proposal, as defined in Table 2 of Schedule 1 of MS 1078 has been exceeded in the reporting period, regarding the maximum temporary storage time of 12 months. Tellus is engaged in ongoing consultation with DWER regarding this issue and as of August 2025 was preparing a detailed, time-based plan to address the backlog. In addition, Tellus have pre-emptively provided DWER with a list of wastes that are likely to exceed the 12-month storage requirement during the next reporting period. A further amendment to the Environmental Licence to authorise neutralisation of acidic and basic wastes in the Waste Neutralisation Plant, and use of the Homogenising Tank to homogenise stratified liquid wastes prior to transfer to the WIP was approved on 18 March 2025, which will assist the safe processing and disposal of most of the liquid waste that has exceeded the 12-month temporary storage timeframe. The delay in obtaining regulatory approvals required for the disposal of radioactive wastes has now been resolved and permits for the permanent disposal of these wastes are now being issued. The first disposal event for DSRS occurred during the reporting period (20-January 2025).
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.	The annual waste audit identified that records of waste characteristics, quantity and storage duration were readily available; however, as identified during the current and previous annual waste audits, specific coordinates for the location of each waste package stored in the waste cell and temporary storage area was not accurately recorded, except for radiological waste and some highly hazardous wastes. Based on the above findings, Tellus was technically non-compliant with this Condition during the reporting period; however, with the issuing of MS 1234 in December 2024 it is no longer a requirement to record specific coordinates for the location of each waste package. DWER issued a formal letter of non-compliance on 25 January 2025; however, this stated that 'Non-compliance with Condition 7-3 (4) has been resolved by a Ministerial Statement amendment as requested by Tellus Holdings Ltd on 8 September 2023. No further actions are required for this non-compliance.'
1078: P8.1.2	Independent Annual Audit	The facility is managed in accordance with all regulatory requirements.	The second objective of Condition B9-1 'that the facility is managed in accordance with all regulatory requirements' was not met based on non-compliances identified against nine conditions of Licence L 9420-2020/1 during two DWER inspections and an internal licence audit. The non-compliances against Licence L9240-2020/1 are detailed in the Annual Waste Audit Report and have been reported through the Annual Environmental Report (AER) and Annual Audit Compliance Report (AACR).

3.1 Management plans

Table 3-4 summarises the approved versions of management plans required by MS 1078, as of 30 June 2025. These are the plans that are referenced in MS 1234, which was published on 13 December 2024. It is noted that following extensive consultation with DWER Tellus has updated the LMMP (V1 22/11/2022) and the Flora and Vegetation Management Plan (FVMP) (v4 13/10/2022) and, although not formally approved by the department, DWER has informed Tellus to implement the updated versions. With the exception of the Fauna Management Plan, MS1234 requires that the LMMP, FVMP and WFDCP are updated.

Table 3-4 – Approved management plans

Condition No.	Management Plan	Date
9-2	Leachate Monitoring and Management Plan (LMMP), VE	07 May 2020
10-5	Flora and Vegetation Management Plan (FVMP), V1	19 June 2019
11-2	Fauna Management Plan (FMP), V1	30 May 2022
12-1	Waste Facility Decommissioning and Closure Plan (WFDCP), V4	14 November 2022

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 current approved versions of management plans listed in Table 3-4 were reviewed as part of this compliance assessment. Other key operational control documents referenced in these plans included:

- Vegetation Clearance Procedure, V0, 18 October 2024.
- Bushfire Management Plan, V3, 28 November 2023.
- Air Quality Management Plan, V2, 11 September 2023.
- Erosion and Sedimentation Management Plan, V2, 21 February 2024.

At the time of writing the LMMP, FVMP and WFDCP were in the process of being updated as required by MS1234.

3.2 Management plan implementation

3.2.1 Leachate Monitoring and Management Plan

Tellus utilise a risk based approach to achieve environmental objectives; including the objective to ‘ Avoid where practicable, or otherwise minimise, contamination of soil quality and soil pore water.’

A key control to achieve this was the site selection criteria. The Sandy Ridge development envelope has no evidence of significant aquifer development or groundwater recharge (CyMod, 2021), the site lacks surface water bodies, has low annual average rainfall, and evaporation rates 10 times higher than annual average rainfall.

On-going operational controls that are implemented to minimise the risk of generating leachate include:

- Implementing strict waste acceptance criteria, preventing the opportunity to generate leachate by not directly depositing waste containing free liquids (such as sludge or liquid waste inside drums), not accepting putrescible waste that may decompose into a liquid state, and not directly placing wastes that when compacted will release moisture.
- Operate the waste immobilisation plant per operational procedures that include Immobilisation formulations using kaolin and or cement to immobilise or chemically bind liquid and sludge waste.

- Free-liquid testing per Tellus' geotechnical trials and formulation development works to confirm that free liquids are not generated once the immobilised waste is encapsulated.
- Covering cells to exclude rainfall or surface water ingress during mining and backfilling, to create a dry operational environment.
- Installing bunds and diversion channels around cells to exclude surface water from entering during mining or waste operations.
- Manage water introduced to the cell (e.g. for compaction or dust control) to avoid ponding or saturation. Water application procedures will address machine operator training, application flow rates, defining the application area, supervision and post-application measurements (e.g. CBR and moisture).
- Install civil-engineered cell caps designed to minimise ingress of rainwater to closed waste cells by:
    - Resisting water ingress by promoting runoff.
    - Resisting water ingress using low permeability barriers.
    - Resisting water ingress using a store-and-release barrier.
    - Resisting erosion.
    - Maintaining integrity whilst allowing for some settlement of the waste cell content.
- Construct active waste handling areas (waste inspection bays, liquid waste dispensing area, waste immobilisation plant) with concrete-bunded floors with self-contained drainage with capacities up to 1 in 100 year 72-hour storm events (described in DWER Licence L9240/2020/1).

Groundwater Monitoring

A baseline groundwater assessment was completed between April and September 2020 to establish site-specific trigger and threshold criteria. The baseline groundwater monitoring program included 12 monitoring events (fortnightly over six months) to establish a baseline to establish trigger and threshold criteria. Five key kaolin bores were sampled, as well as a deep granite bore. As silcrete bores are typically dry and only monitored following significant rainfall events, these bores were not included in the baseline assessment.

Subsequently biannual monitoring has been undertaken against the parameters defined in Appendix H1 and H2 of the LMMP. At the time of preparing this report the LMMP had been updated to reflect the results of the 12 Groundwater Monitoring Events (GMEs) and updated trigger and threshold levels.

Biannual sampling was undertaken in October 2024 (GME 8) and April 2025 (GME 9).

- Standing water levels (SWL) were measured at all groundwater bores. An increase of greater than 0.5m above the previous biannual SWL measurement is set as the trigger criterion requiring investigation and an increase of greater than 1.0m above the previous measurement is nominated as the threshold criterion that requires investigation and possible action. While there has been some variability of since the Facility commenced operations, these have been within the trigger and threshold criteria.
- Groundwater samples taken from five kaolin bores and one deep granite bore had 73 and 74 analytes measured during Monitoring Event 8 and 9 respectively.

Monitoring Event 8 identified:

- 50 analytes were below detection limits at all bores.
- 65 analytes were below trigger levels, indicating stable groundwater conditions.
- 8 analytes exceeded trigger levels, consisting of 4 metals, 2 radionuclides, and 2 PFAS compounds.
- PFAS levels have declined following previous spikes.
- No threshold exceedances were recorded, meaning all concentrations remained within regulatory limits.

Monitoring Event 9 identified:

- 51 analytes were below detectable limits at all bores.
- 66 analytes were below trigger levels, indicating stable groundwater conditions.
- 8 analytes exceeded trigger levels, consisting of 4 metals, 2 radionuclides, and 2 PFAS compounds.
- PFAS levels have declined following previous spikes, with Sum of PFAS below detectable limits at all kaolin bores.
- No threshold exceedances were recorded, meaning all concentrations remained within regulatory limits.
- Standing Water Levels were similar to previously reported events, with no trigger exceedances.

Two baseline soil sampling events have been undertaken, the first in April 2019, focused on the land within the Crown Lease boundary in the vicinity of the Facility, and the second in January 2020, focused on the Mt Walton Access Road and the Sandy Ridge Facility Access Road. The baseline results were presented in a report (Landloch, 2020).

Baseline soil quality data is compared against future targeted soil quality monitoring (every three years) to assess whether the Facility has adversely impacted soil quality. The first follow-up study was completed in January 2023 (Tellus, 2023), comparing data collected with the original baseline and relevant National Environmental Management Plan (NEMP) guidelines to determine whether soil at Sandy Ridge has been contaminated. Soil concentrations of heavy metals, Asbestos, PBC and PFAS were similar to baseline levels, with no exceedances of NEMP HIL B trigger levels. There was also no evidence of raised radionuclide activity in the soil adjacent to the Radiation Yard. Results of this audit indicate that controls in place to present soil contamination at Sandy Ridge are operating effectively.

Soil quality data is likely a poor indicator of the potential for leachate generation from waste deposited in cells. This is because surface soils are separated from subsoils by an impermeable natural silcrete layer. If leachate from waste cells (below silcrete) were generated, it is highly unlikely to permeate through the silcrete to surface soils. Therefore, groundwater quality is the preferred early response indicator for leachate management.

3.2.2 Flora and Vegetation Management Plan

The major direct impact on flora is through clearing activities. Five key potential indirect impacts from facility operations have been highlighted in the FVMP (Tellus, 2022). These are:

- Increased risk of fire.
- Altered hydrology.
- Increased dust.
- Uptake of saline water from dust suppression; and
- Introduction and spread of weeds from vehicles and human activity.

During the operational phase clearing of vegetation will be periodic. Tellus submitted a Works Approval application in 2021 to construct and operate a further three waste cells (Cells 2 to 4) at the Facility to provide waste storage for the next 2 to 6 years and up to 40 ha of native vegetation clearing is expected for development of these.

The project approval 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.

Approximately 25.6 ha of this approved clearing was completed in 2024 and 2025 to enable construction of Cell 2. Future mining of new cells would be carried out in campaigns on a frequency commensurate with the volume of wastes to be isolated.

As of 30 June 2025, a total of 50.51 hectares of native vegetation within the development envelope had been cleared for mine pit/waste cells and a total of 71.03 hectares of native vegetation within the development envelope had been cleared for associated infrastructure. Clearing is therefore within the limits stated in Ministerial Statement No 1078 (MS 1078).

Tellus manages clearance of native vegetation through a Permit to Work system, which 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.
- Reduce the impact of clearing on any environmental value.

Clearance permits are required and all cleared areas must be surveyed with disturbance data recorded in ArcGIS and reported annually through the Mining Rehabilitation Fund (MRF) report and Annual Environmental Report to DMIRS.

The Vegetation Clearing Procedure (SR-08.503) includes the requirement to hold a pre-clearing meeting (for workers conducting clearing) to ensure that the clearing plan is understood and clearing can only commence after a pre-clearing inspection is conducted. To ensure direct impacts on specified species are avoided and indirect impacts are managed the following controls are also defined in the procedure:

- 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 MYOSH.

Any unauthorised clearing records will be maintained in the MYOSH database.

Conservation Species Condition Monitoring

Multiple botanical surveys have been previously completed at the Sandy Ridge Facility and surrounding areas. The most relevant survey is the Detailed Flora and Vegetation Assessment of the Sandy Ridge Facility, completed by Western Botanical (WB Ref 971, 2022). Subsequent surveys are listed in the Detailed Flora and Vegetation Assessment of Priority 1 Area, New Facility Adjacent to Sandy Ridge (WB Ref 1032, 2024).

Vegetation and conservation significant species condition monitoring is undertaken annually in Spring. The 2024 vegetation health survey vegetation health monitoring survey was conducted on 30th July and 2nd August 2024, by Western Botanical. The survey concluded that the majority of sites in the Study Area are in good condition. Overall, there was a significant decrease in mean plant health score recorded between Phase 1 and 3 at the experimental sites, and no significant difference at control sites. Examining the data, many sites had a healthy overall site condition score, and the decrease in mean plant health score was due to the death or decline of a single plant. Two sites (Sites 6 and 10) were shown to have a majority of vegetation in decline, which was thought to be due to waterlogging.

Monthly reports identified some weed species in the village and infrastructure areas between August and December. A campaign to remove them was undertaken in January 2024 and no more were reported for the remainder of the reporting period.

Reporting

The FVMP includes the requirement to prepare a monthly environmental report in relation to compliance with environmental management controls on site. Comprehensive monthly reports had been prepared for the reporting period and corrective actions had been managed via the MYOSH HSE management software.

3.2.3 Fauna Management Plan

Fourteen fauna species are listed under the BC Act and/or EPBC Act or by DBCA that have been recorded or may occur within the locality of Sandy Ridge; however, of these, only two have been sighted since the project began:

- Malleefowl (*Leipoa ocellata*) listed as Vulnerable under the Biodiversity Conservation Act 2016 (BC Act) and the EPBC Act
- Woma Python (*Aspidites ramsayi*) Priority 1 under the BC Act

Direct impacts on fauna from ongoing operations may include interaction with vehicles, human induced bushfires, increased predation from feral species attracted to the area; however, the highest risk is from loss of fauna foraging, breeding, roosting, sheltering and/or dispersal habitat due to clearing of vegetation within the development envelope.

As discussed in section 3.2.2, clearing is managed in accordance with the current, approved Vegetation Clearing Procedure which specifies the following requirements regarding fauna management:

- Authorised clearing permits for all clearing activities.
- Pre-clearing surveys to be conducted prior to any ground disturbance to determine if there are any signs of fauna (particularly conservation significant fauna) activity within the area proposed for clearing and relocate any identified fauna prior to clearing.
- A 50m buffer around any identified Malleefowl mounds within the area to be cleared.
- Clearing areas to be flagged prior to clearing commencing.

Sighted clearing records verified implementation of these requirements (no Malleefowl mounds detected).

Prevent 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. At the time of reporting the most recent version was V2, dated 29 March 2022. Fire breaks are inspected weekly and annual firebreak maintenance was conducted in the first week of January 2025.

Recording fauna mortalities

The MYOSH incident reporting module is used to log incidents and events, including fauna sightings/ mortalities for trends in location of sighting or mortality or reason of mortality.

Excluding vehicle strikes on access roads, one fauna death attributable to site activities was recorded during the reporting period:

- 03 August 2024 - A small bird (possibly a Little Woodswallow) was found deceased inside an IBC containing isocyanate that was in the process of being solidified in the Rad Yard. A verbal reminder given to staff and liquid waste processing procedures are currently being updated to require portable mixing vessels to remain closed while unattended.

No fauna deaths of Conservation Priority Species occurred during the reporting period.

3.2.4 Waste Facility Decommissioning and Closure Plan

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 2026.

3.3 External inspections and audits

The following external inspections and audits have been conducted during the reporting period.

1. July 2025 – An independent waste audit was conducted by KASA Consulting as required by Condition 8 of MS 1234. Two non-compliances were identified during the audit against the following conditions:
    a. Condition 7-3 (4) - Failure to ensure that the waste management system provide details about the … 'specific coordinates for the location of each waste package stored in the waste cells and temporary storage area'. Condition 8-2 (6) also includes a requirement that the independent waste audit shall assess whether site operations ensure the final location of waste in the waste cell is accurately recorded in three dimensions (northing, easting and elevation).
    b. Condition 8-1 (2) – Failure to ensure that the facility is managed in accordance with all regulatory requirements.
2. July 2024 - A compliance inspection was conducted by DWER against the requirements of Environmental Licence L9240/2020/1. The inspection resulted in a letter of non-compliance that identified non-compliance associated with stormwater management (Conditions 1, 22 and 23), waste storage (Condition 7 - Table 3), NORM waste container (Condition 9), waste processing and disposal (Condition 15), waste stabilisation and disposal Condition 16(b), post-stabilisation verification (Condition 17), waste disposal (Condition 19) and record keeping (Condition 29).

    In addition, following the July DWER inspection, a letter of warning was issued to Tellus for contravention of Section 53 of the EP Act, 1986, regarding the construction of additional infrastructure and equipment without the required works approval. Namely, the Air Pollution Control Residue (waste from the waste-to-energy plant) storage and treatment system.
3. July 2024 - A surveillance audit was conducted by Equal Assurance to assess the level of conformance with the quality, occupational health and safety, and environmental management systems standards. The audit concluded a high level of confidence that Tellus would consistently meet relevant quality, occupational health and safety, and environmental management systems standard requirements.
4. November 2024 – Independent audit against the Radiological Council Certificate of Registration for the Sandy Ridge site. The audit concluded that Tellus operate the Sandy Ridge facility with a fair level of compliance with their Radiological Council Certificate of Registration and associated regulations. A total of nine non-compliant observations were identified during the audit.
5. April 2025 - A compliance audit against MS 1078 was conducted by DWER. Three non-compliances were raised against the following conditions:
    a. Condition 1-1 – Failure to ensure that temporary storage of waste does not exceed the maximum of 12 months.
    b. Condition 7-3 (4) - Failure to ensure that the final location of waste in the waste cell is accurately recorded in three dimensions (northing, easting and elevation).

c. Condition 8-1 (2) – Failure to ensure that the facility is managed in accordance with all regulatory requirements.

4 SUMMARY OF FINDINGS AGAINST MS 1234

Although MS1234 was published on 13 December 2024 and supersedes MS1078 and MS1152, it includes a requirement that the Compliance Assessment Plan (CAP) is not submitted for at least six months following the issuing of MS 1234. As a result, a formal assessment against MS 1234 has not been undertaken, with the exception of the annual waste audit. This was undertaken in July 2025 and assessed compliance against Condition B9 of MS 1234, which broadly requires that the waste management system is effectively implemented.

The audit found that the Waste Management System was generally well established and implemented with extensive evidence sighted to support compliance with the first objective of MS 1234 Condition B9- 1; to 'ensure that only permitted wastes are accepted at the facility for placement in the repository' was achieved.

The second objective of Condition B9-1 'that the facility is managed in accordance with all regulatory requirements' was not met based on non-compliances identified against nine conditions of Licence L 9420-2020/1 during two DWER inspections and an internal licence audit. The non-compliances against Licence L9240-2020/1 are detailed in the Annual Environment Report (AER) and are reported through the AER and Annual Audit Compliance Report.

It is noted that Tellus has consulted closely with the regulator regarding the identified non-compliances and most of the identified issues have either been addressed or have an action plan to close out the non-compliances within defined timeframes.

5 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 2025).

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.

6 REFERENCES

6.1 Supporting, verifying information, documentation

[01] Tellus, 2020, 2019/2020 Compliance Assessment Report (Ref.GRACE-552978189-22917)	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
[04] Letter, DWER, 2018, Statement 1078 Sandy Ridge Facility CAO, 17/12/2018, Ref: DWERA-001158.	Letter
[05] Tellus, 2024, Compliance Assessment Report 2023/2024, September 2024.	Report
[06] Tellus to DWER, 2019, Ministerial Statement 1078 – Compliance Assessment Report 2018/2019 – Tellus Holdings Ltd, Transmittal No.: SRDP001-000121, 23/09/2019, 01:07:00 PM.	Transmittal
[07] Draft Sandy Ridge 2024-25 Annual Waste Audit Report, KASA Consulting (Sept 2025)	Report
[08] Sandy Ridge Chemical Waste Acceptance Procedure – SR-09-PRO-004, V2 (19 Sept 2022).	Procedure
[09] Waste Acceptance and Verification Procedure - SR-09-PRO-007 V1 (23 Oct 2023)	Procedure
[10] Waste Verification Testing Procedure SR-09-PRO-006 V1 (13 Feb 2024)	Procedure
[11] Waste Quarantine Procedure SR-09-PRO-008 V1 (21 Feb 2024)	Procedure
[12] Tellus, Leachate Monitoring and Management Plan, Version E, 7 May 2020, Ref: HS00-1760150200-49173.	Plan
[13] Tellus to DWER, 2019, Sandy Ridge Facility MS 1078 – revised LMMP Rev E, Transmittal No.: SRDP001-000345, 07 May 2020, 02:42:00 PM.	Transmittal
[14] Letter, DWER, 2020, Sandy Ridge Facility Ministerial Statement 1078 Leachate Monitoring and Management Plan Approved, 14/05/2020, Ref: DWERDT280973; DWERT463	Letter
[15] Tellus, 2019, Flora and Vegetation Management Plan, V1, 19/06/2019, Ref: HS00-1760150200-22152.	Plan
[16] DWER, 2019, Sandy Ridge Facility MS 1078 Flora and Vegetation Management Plan Approved, 01/07/2019, Ref: DWERA-002019.	Letter
[17] DWER_CAR 2018-2019_Desktop Audit Report_2019 10 24.pdf	Report
[18] Condition Assessment, *Lepidosperma spp*. Sandy Ridge. Report WB932, Western Botanical, June 2021.	Report
[19] Tellus, 2019c, Construction Fauna Management Plan, 13/06/2019, V1, Ref: HS00-1760150200-22117.	Letter
[20] Letter, DWER, 2019, Sandy Ridge Facility MS 1078 Construction Fauna Management Plan Approved, 25/06/2019, Ref: DWERA-002019.	Letter
[21] Tellus, 2018, Sandy Ridge Facility Statement Number 1078 Condition 12-1 – request for extension, 07/12/2018, Ref: HS00-1760150200-20468.	Letter
[22] DWER, 2018, Statement 1078, Sandy Ridge Facility, Request for Extension on Condition 12-1, 17/12/2018, Ref: DWERA-001158.	Letter
[23] DWER, 2019, Sandy Ridge Facility, Ministerial Statement 1078, Waste Facility Decommissioning Closure Plan, Amendments Required, Ref: DWERDG 676/19, 29 November 2019.	Letter
[24] 2020, Sandy Ridge Facility Waste Facility Decommissioning Closure Plan, Ref: HS00-1760150200-45, V3, 6 February 2020.	Plan
[25] DWER, 2020, Sandy Ridge Facility, Ministerial Statement 1078, Waste Facility Decommissioning Closure Plan, Approved, Ref: DWERT4733, 27 February 2020.	Letter
[26] Tellus submission of renewed insurance certificates to DWER, 07 August 2025.	Email
[27] Chubb Insurance Australia Ltd. Certificate of Currency Pollution Liability. Policy No. 02CL036460.	Certificate
[28] Certificate of Placement – Industrial Special Risks Insurance. Policy No. 47-ZEN-313524-04.	Certificate

[28A] Certificate of Placement – Liability Insurance. Policy Nos. 350660/01/2025 (Primary Layer) and CU0691A25IZA (First Excess Layer).	Certificate
[29] DWER Acceptance of Bank Guarantee Ref: DWERA-001158, 12 June 2020	Letter
[30] Report to DWER on adequacy of insurance policies, 11 Nov 2021.	Email
[31] Landloch Sandy Ridge Soil Sampling_DRAFT_2020 07 16.pdf	Report
[32] Tellus, 2023 Sandy Ridge Soil Audit – 2023	Report
[33] Sandy Ridge Radiological Waste Acceptance Procedure (RWAP) – SR-09-PRO-031, V2 (21 April 2021).	Procedure
[34] 2023-24 Sandy Ridge Facility Annual Waste Audit Report	Report
[35] Leachate Monitoring and Management Plan, V1. 22 November 2022	Plan
[36] Flora and Vegetation Management Plan, V4. 13 October 2022	Plan
[37] Fauna Management Plan, V1. 30 May 2022	Plan
[38] Waste Facility Decommissioning Closure Plan, Rev 4. 18 August 2022	Plan
[39] Works Approval W6700/2022/1 – Works Approval to construct three additional waste cells, to be known as Cell 2, Cell 3 and Cell 4.	Works Approval
[40] Institutional Control Period (ICP) Works Programme and Budget - 2023	Report
[41] Notice of decision to consent to amend a referred proposal during assessment. Sandy Ridge Facility - Alignment of Gate Waste Acceptance Tonnage Assessment No. 2309. 22 August 2022.	Letter
[42] Alignment of Gate Waste Acceptance Tonnage – Environmental Review Document. Assessment Number 2309, 17 Feb. 2023 Rev 0	Report

6.2 External references

A OEPA. 2012a. Post Assessment Guideline for Preparing an Audit Table, Post Assessment Guideline No. 1. August. Office of the Environmental Protection Authority. Perth, Western Australia.

B OEPA. 2012b. Post Assessment Guideline for Preparing a Compliance Assessment Plan, Post Assessment Guideline No. 2. August. Office of the Environmental Protection Authority. Perth, Western Australia.

C OEPA. 2012c. Post Assessment Guideline for Preparing a Compliance Assessment Report, Post Assessment Guideline No. 3. August. Office of the Environmental Protection Authority. Perth, Western Australia.

D OEPA. 2012d. Post Assessment Guideline for Making Information Publicly Available, Post Assessment Guideline No. 4. August. Office of the Environmental Protection Authority. Perth, Western Australia.

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.		Non-compliant	The authorised extent of the proposal was exceeded during the reporting period regarding the 12 month temporary storage time.
		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 30 June 2025, a total of 50.51 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 30 June 2025, a total of 71.03 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 62,637.58 tonnes of chemical waste, 875.41 tonnes and 1kL of radiological waste and 880 sealed radioactive sources. was received during the reporting period.
		Temporary waste storage on surface	up to 15,000 tonnes	Compliant	The temporary storage quantity is continually monitored and was not exceeded.
		Maximum temporary storage time	up to 12 months	Non-compliant	The 12 month storage requirement was exceeded during the reporting period for certain liquid and radiological wastes.
		Waste (including treated waste) disposed to waste cells	up to 280,000 tonnes per annum	Compliant	A total of 67,892.34 tonnes of chemical waste 1150.66 tonnes of radiological waste was permanently disposed of to Waste Cell 1during the reporting period.
		Water use	up to 0.18 gigalitres per annum	Compliant	A total of 0.049 gigalitres (48,732 m^3) was used on site during the reporting period.