SANDY RIDGE
Annual Compliance Report 2024-2025
EPBC 2015/7478

Prepared for

Australian Government
Department of Climate Change, Energy, the Environment and Water

Tellus Holdings Ltd

September 2025

Prepared by

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Tellus is certified to AS/NZS ISO 9001, AS/NZS ISO 14001 and AS/NZS 45001.

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REVISION HISTORY

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ABBREVIATIONS

ACR	Annual Compliance Report
ADG Code	Australian Dangerous Goods Code
Cth	Commonwealth
CEO	Chief Executive Officer of the Department of Water and Environmental Regulation, responsible for the administration of section 48 of the *Environmental Protection Act 1986* or their delegate
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DGMMP	Deep Groundwater Monitoring and Management Plan
DSRS	Disused Sealed Radioactive Source
DWER	Department of Water and Environmental Regulation
EMP	Environmental Management Plan
EPBC Act	*Environmental Protection and Biodiversity Conservation Act 1999*
EPBC 2015/7478	EPBC Approval dated 7 January 2019
EP Act	*Environmental Protection Act 1986*
GME	Groundwater Monitoring Event
IBC	Intermediate Bulk Container
LMMP	Leachate Monitoring and Management Plan
LLW	Low-Level Radioactive Waste
MS 1078	Ministerial Statement 1078
NEMP	National Environmental Management Plan
NEPM	National Environment Protection Measure
PFAS	Per- and poly- fluoroalkyl substance
Tellus	Tellus Holdings Limited
The Department	Department of Climate Change, Energy, the Environment and Water
The Facility	The Sandy Ridge Facility
tpa	Tonnes per annum
WA	Western Australia

DECLARATION OF ACCURACY

Project Name	Sandy Ridge Facility
Approval Holder	Tellus Holdings Limited
EPBC Reference	2015/7478
Approved Action	Construct and operate an open-cut kaolin clay mine, arid near surface geological waste repository with the mine voids, and associated infrastructure for the storage, treatment, recovery and permanent isolation (disposal) of hazardous and intractable waste (including low level radioactive wastes), approximately 75 km north-east of Koolyanobbing in the Shire of Coolgardie, Western Australia [As described in EPBC referral 2015/7478 subject to the variations of the action accepted by the Minister under section 156B on Friday, 22 December 2017 and Friday, 9 November 2018].
Reporting Period	06 July 2024 to 05 July 2025

Declaration of Accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signature of Authorised Reporting Officer	
Name of Authorised Reporting Officer	Pascoe Murison
Position of Authorised Reporting Officer	General Manager Operations
Organisation Name	Tellus Holdings Limited
Organisation ACN	138 119 829
Organisation ABN	97 138 119 829

EXECUTIVE SUMMARY

This report has been prepared in accordance with Part B, Condition 9 of EPBC 2015/7478 that requires a Compliance Report to be prepared for each 12-month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. This Compliance Report has been prepared in accordance with the requirements of the Annual Compliance Report Guidelines (Commonwealth of Australia, 2014). The reporting period for this Compliance Report has been defined as from 6 July 2024 to 05 July 2025.

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). Permanent disposal of waste to the waste cell commenced on 23 March 2021. During the reporting period the facility was fully operational.

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. EPBC 2015/7478 therefore requires updating to replace references to MS 1078 with references to applicable conditions in MS 1234.

Tellus's overall compliance status with EPBC 2015/7478 for the reporting period is summarised below.

Number of Compliant Audit Elements	Number of Non-compliant Audit Elements	Number of Not Applicable Audit Elements
19	1	7

Tellus identified the following one non-compliant audit element with EPBC 2015/7478 during the reporting period. This was associated with the temporary storage of certain liquid and radiological wastes in excess of the 12-month maximum temporary waste storage limit. Specifically, Part A, Condition 1 of EPBC 2015/7478, specifies that '*When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1 [of MS 1078], unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.'*

Under MS1234, the condition for maximum temporary surface storage time has been amended from "Up to 12 months" to "Up to 12-months, or as agreed by the CEO."

Tellus pre-emptively notified DCCEEW of all waste packages (chemical and radiological) expected to exceed the 12-month temporary storage limit during the 2024-2025 reporting period and has done so again for the 2025-26 reporting period.

Tellus is also 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.

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 certain 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). 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).

The second geological repository, Cell 2 is currently in development and construction is expected to be completed in 2026. Upon completion of Cell 2, DSRS radiological waste will be placed in a batch at the bottom of the Cell 2 and encapsulated in concrete in accordance with the Radiological Safety Case. Tellus therefore anticipates full compliance with EPBC2015/7478 Conditions within the next 2 years.

A summary of the status of all conditions of EPBC 2015/7478 is outlined within the Compliance Assessment Audit Table presented in Appendix A.

1 INTRODUCTION

This Compliance Report has been prepared to document compliance with the Australian Government's Department of Climate Change, Energy, the Environment and Water (DCCEEW or the Department) approval EPBC 2015/7478 issued in accordance with Part 9 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The approval allows Tellus Holdings Ltd (Tellus) to construct and operate a dual open cut kaolin clay mine and arid near-surface geological waste repository known as the Sandy Ridge Facility (the Facility); licenced to accept Class IV and Class V waste.

1.1 Background

In accordance with the requirements of Part 9 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) the Australian Government granted approval to Tellus Holdings Ltd (Tellus) to construct and operate an open-cut kaolin clay mine, arid near-surface geological waste repository within the mine voids, and associated infrastructure on 7 January 2019. The approval (Ref: EPBC 2015/7478) allows for the treatment, recovery and permanent isolation (disposal) of hazardous and intractable wastes (including low level radioactive wastes). The Sandy Ridge Facility (the Facility) is located approximately 75 kilometres north-east of Koolyanobbing in the Shire of Coolgardie, Western Australia.

The Facility was granted WA government Ministerial Approval on 26 June 2018 (Ministerial Statement 1078).

The Facility is approved to mine up to 280,000 tonnes per annum (tpa) of kaolin clay with the mining voids used for the permanent isolation of wastes, including hazardous and intractable wastes, and LLW. The Facility is currently licenced to receive up to 280,000 tpa of Class IV and Class V waste for approximately 25 years; however, a Proposal has been submitted by Tellus (Assessment number 2309 – Sandy Ridge Facility – Alignment of Gate Waste Acceptance Tonnage) to increase the tonnage of waste accepted at the Sandy Ridge Facility from the current Ministerial limit of 100,000tpa to align with the DWER licence prescribed limit of up to 280,000 tpa.

A Regional Location plan and a Site Plan are presented as Figure 1-1 and Figure 1-2 at the end of this Section.

1.2 Purpose and Scope

This Compliance Report is submitted in accordance with the requirements set out in Part B, Condition 9 of EPBC 2015/7478, which requires the following:

Condition 9 – Annual compliance reporting

The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. The approval holder must:

- *a) Publish each compliance report on the website with 60 business days following the relevant 12 month period;*
- *b) Notify the Department by email that a compliance report has been published on the website within five business days of the date of publication;*
- *c) Keep all compliance reports publicly available on the website until this approval expires;*
- *d) Exclude or redact sensitive ecological data from compliance reports published on the website; and*
- *e) Where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department with 5 business days of publication.*

The reporting period for this Compliance Report has been defined as from 7 July 2023 to 6 July 2024 and is based on Tellus' assessment of compliance with the conditions of EPBC 2015/7478.

1.3 Report Methodology

This Compliance Report has been prepared in accordance with the requirements of the *Annual Compliance Report Guidelines* (Commonwealth of Australia, 2014).

1.4 Retention of Compliance Reports

Tellus will retain Compliance Reports for the life of the approval in accordance with Part B, Condition 9-c of EPBC 2015/7478 and will continue to implement the proposal until the Minister has determined all conditions have been satisfactorily addressed.

1.5 Public Availability of Reports

Tellus will make this Compliance Report publicly available in accordance with Part B, Conditions 9-a and 9-c of EPBC 2015/7478. The 2023-24 report (#5) was published on the Tellus website on 24th September 2024.

In accordance with Part B, Condition 9-d of EPBC 2015/7478 Tellus will exclude or redact any sensitive ecological data from Compliance Reports published on the website. Where sensitive ecological data has been excluded or redacted, Tellus will, in accordance with Part B, Condition 9-e of EPBC 2015/7478 submit the full report to the Department within five business days of publication.

No sensitive ecological data is planned to be excluded or redacted from this Compliance Report.

1.6 New Environmental Risks

No new environmental risks were identified during the reporting period.

1.7 Format of the Report

The format of this Compliance Report is as follows:

- Authorised Reporting Officer's endorsement, including Tellus' declaration of accuracy.
- 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 Project 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 specifies the limitations of the report.
- Section 5 provides references used in this Compliance Report.

Appendix A presents the Audit Table, a tabulated review of the audit results against the requirements of EPBC 2015/7478.

This Compliance Report 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.

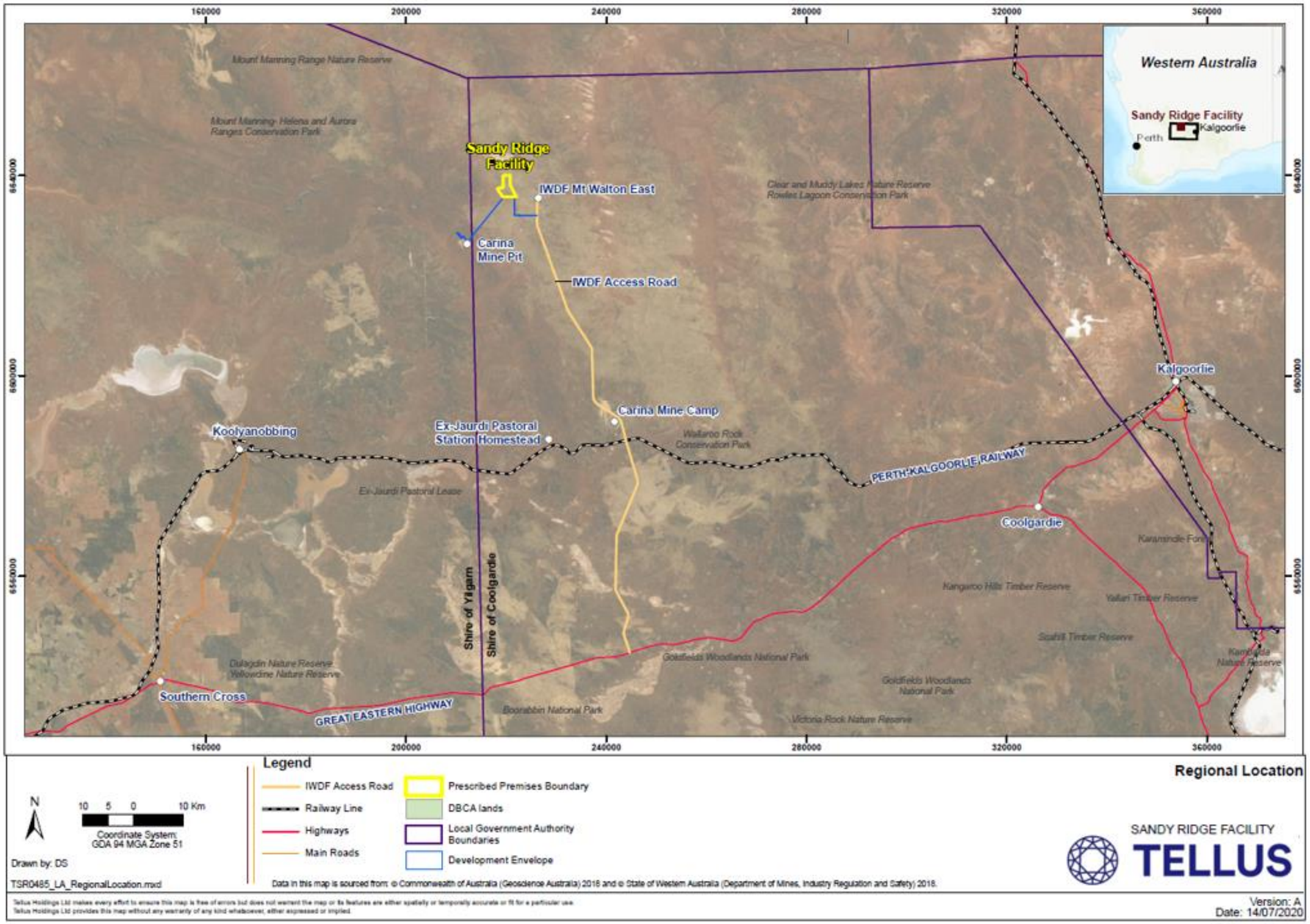
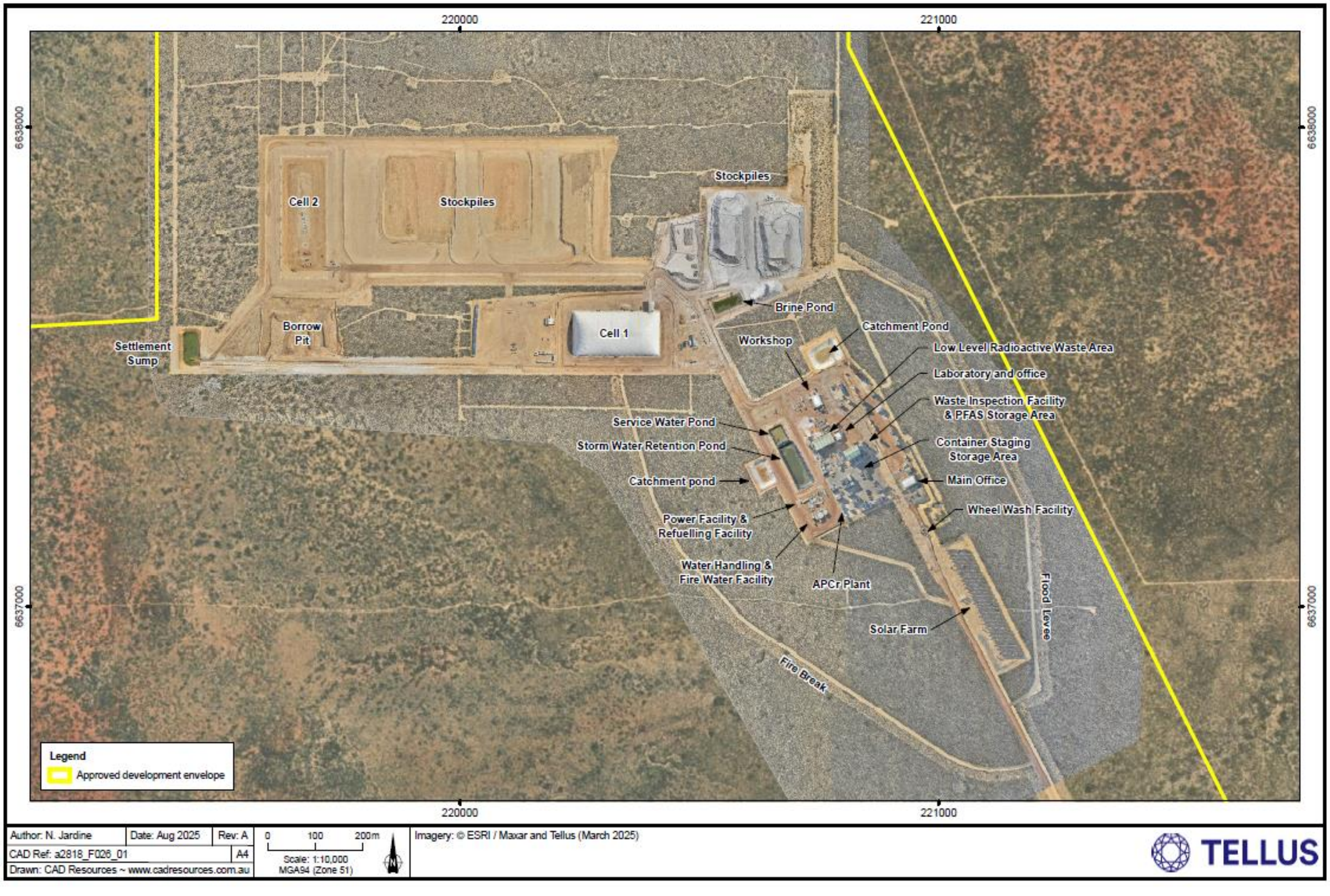


Figure 1-2 Sandy Ridge Facility Site Plan.



2 IMPLEMENTATION STATUS

Table 2-1 summarises the status of Commonwealth and State project approvals.

Table 2-1 – Project Approvals

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 northeast of Koolyanobbing.	27/07/2018	
EPBC 2015/7478 – Action - Construct and operate an open-cut kaolin clay mine, arid near-surface geological waste repository within the mine voids, and associated infrastructure for the storage, treatment, recovery and permanent isolation (disposal) of hazardous and intractable wastes (including low level radioactive wastes), approximately 75 km north-east of Koolyanobbing in the Shire of Coolgardie, Western Australia [As described in EPBC referral 2015/7478 subject to the variations of the action accepted by the Minister under section 156B on Friday, 22 December 2017 and Friday, 9 November 2018].	07/01/2019	31/12/2048
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
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

Approvals	Issued	Finish
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
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.

2.1 Notification of Commencement of Action

On 18 July 2019 Tellus notified by email the Department's Post Approvals Section that commencement of the action occurred on 7 July 2019. The Department acknowledged the notification by return email.

2.2 Construction

Contract completion occurred on 09 October 2020, with a 12 month defects liability period that ended on 09 October 2021. During the reporting period preliminary construction activities commenced for cell 2; including clearing of vegetation and construction of footings.

2.3 Operations

Infrastructure at Sandy Ridge is depicted in Fig 1-2 and consists of:

- Mine infrastructure: stockpile area, storage building, administration offices, laydown yard, stormwater storage tanks (4), brine pond and settlement pond.
- Waste infrastructure: inflatable dome 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, and 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.
- Waste infrastructure including an inflatable dome waste cell cover, waste immobilisation plant workshop and laydown yard, flammable goods store, radiation scanner and waste laboratory.

The facility accepted its first waste, on 6 July 2020.

2.3.1 Waste Received

During the current reporting period a total of 62,120.25 tonnes (normalised) of controlled (chemical) waste was received on site as detailed in in Table 2-2.

Regarding radiological waste, Sandy Ridge receives unsealed and sealed material. For unsealed waste 736.33 tonnes plus 1kL of liquid radioactive waste were received during the reporting period as detailed and Table 2-3 below.

Due to their small sizes sealed sourced generally do not have their weights recorded. Each source is individually recorded in the Radioactive Material Storage Manifest, including the radionuclide and its original and calculated activity. A monthly report is provided to the Department of Health on all radioactive material that has been received and disposed of. During the reporting period Sandy Ridge received 918 sealed sources (DSRS).

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	166.47
D210 – Nickel compounds	2508.55
D220 – Lead and lead compounds	1852.31
D230 - Zinc compounds	0.99
D300 - Non-toxic salts	30,401.5
D330 – Inorganic sulphides	226.25
E100 - Waste containing peroxides excluding hydrogen peroxide	0.64
E130 - Highly reactive chemicals not otherwise specified	22.58
H100 – Waste from the production, formulation or use of biocides and phytopharmaceuticals	347.57
H130 – Organochlorine pesticides	4026.27
H170 – Waste wood-preserving chemicals	23632.93
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	10,338.69
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	35.23
M250 – Surfactants and detergents	26.35

Waste Type	Tonnes (Normalised)
M260 – Highly odorous 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	1,020.62
N100 - Containers or drums contaminated with residues of a controlled waste	1.56
N120 – Soils contaminated with a controlled waste	991.23
N140 - Fire debris or fire wash waters	15.01
N150 - Fly ash excluding fly ash generated from Australian coal fired power stations	6008.81
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	27.00
T100 - Waste chemical substances arising from research and development or teaching activities	0.59
Total tonnes received during reporting period	**62,120.25**

Table 2-3 – Unsealed radiological waste accepted during reporting period

Receival Date	Waste Type	Amount (tonnes or kL)
31/07/2024	Contaminated soil from remediation project	19.04
1/08/2024	Contaminated soil from remediation project	90.38
4/08/2024	O&G waste SCO & SLUDGE	14.99
23/08/2024	SCO Mineral sands tanks	10.12
23/08/2024	LSA mineral sands	6.29
27/08/2024	Carbonatite ore/rock samples	68.25
20/09/2024	O&G waste SCO	6.11
30/09/2024	LLW - contaminated smelter dust	12.97
26/10/2024	Contaminated soil from remediation project	390.6
27/10/2024	Contaminated soil from remediation project	9.78
15/11/2024	NORM drums	4.29
15/11/2024	NORM cont. soil	0.35
15/11/2024	NORM pigging waste	0.07
16/11/2024	NORM sludge	6.72
10/12/2024	Smal sample of NORM rocks	0.001
21/12/2024	Uranium bearing Ore samples	0.138
7/01/2025	NORM (Monazite) soil	0.004
7/01/2025	SCO & LSA	4.7
7/01/2025	NORM soil in drums	1.371
29/01/2025	NORM waste Bulka bag	0.36
17/02/2025	NORM Tailings	5.92
17/02/2025	SCO	2.3
25/02/2025	Uranium mine tailings slurry	0.09
25/02/2025	NORM Impacted Sludge	16.71
26/03/2025	LSA	0.000444
26/03/2025	SCO	0.000106
28/03/2025	NORM - Mineral Sands	0.001163

Receival Date	Waste Type	Amount (tonnes or kL)
28/03/2025	NORM - Mineral Sands	0.00129
6/05/2025	U-Nat & Th-Nat samples	0.001
6/05/2025	Uranium bearing ore samples	0.138
6/05/2025	U-nat samples	0.001
13/05/2025	SCO on pipes	8.88
13/05/2025	SCO on pipes	6.04
13/05/2025	SCO on pipes	10.35
13/05/2025	NORM	3.57
13/05/2025	NORM SCO	4.43
13/05/2025	NORM Sludge	1kL
13/05/2025	SCO on pipes	9.63
13/05/2025	SCO on pipes	4.94
3/06/2025	SCO on pipes	7.14
3/06/2025	SCO on pipes	4.75
3/06/2025	SCO on pipes	4.26
25/06/2025	SCO	0.642
Total tonnes received during reporting period		**736.33 (and 1kL)**

2.3.2 Waste Permanently Disposed

Permanent disposal in the waste cell commenced on 23rd March 2021.

During the reporting period a total of 68,179.47 tonnes of controlled waste was permanently disposed of in Cell 1. Waste permanently disposed of during the reporting period is summarised by waste code in Table 2-4. This included 7,018 tonnes of waste processed through the Waste Immobilisation Plant (WIP).

Table 2-4 – Permanently disposed waste during reporting period

Waste Type	Normalised 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	12.82
D110 – Inorganic fluorine compounds (excluding calcium fluoride)	20.27
D120 – Mercury and mercury compounds	182.75
D130 – Arsenic and arsenic compounds	638.40
D190 – Copper compounds	4.31
D210 – Nickel compounds	2,525.52
D220 – Lead and lead compounds	1,914.98
D230 – Zinc compounds	0.00
D300 – Non-toxic salts	30,362.67
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	1,325.82
H130 – Organochlorine pesticides	5,336.71

Waste Type	Normalised tonnes
H170 – Waste wood-preserving chemicals	2,365.04
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	10,595.75
J180 – Oil sludge	185.61
M100 – Waste substances and articles containing polychlorinated biphenyls (PCBs)	89.33
M130 – Non-halogenated organic chemicals	5.07
M220 – Isocyanate compounds	19.43
M270 – Per- and poly- fluoroalkyl substance (PFAS) contaminated materials, including waste PFAS containing products and contaminated containers	2,399.68
N100 – Containers or drums contaminated with residues of a controlled waste	1.59
N120 – Soils contaminated with a controlled waste	714.88
N150 – Fly ash excluding fly ash generated from Australian coal fired power stations	4,835.16
N205 – Industrial waste treatment plant residues	4,344.12
T100 - Waste chemical substances arising from research and development or teaching	0.59
Total tonnes disposed of during reporting period	68,179.47

Table 2-5 details the permanently disposed of unsealed radiological waste during the reporting period. This material totalled 1,144.69 tonnes.

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 2-5 – Permanently disposed of unsealed radiological waste during the reporting period.

Tellus Reference Number	Date Received	Date Disposed	Disposal Permit No	Notes	Origin/Location/Client	Total weight or volume (kg / L)
PO4206001	4/05/2024	29/11/2024	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	33210
PO5187001	4/06/2024	12/12/2024	DP-SRF-20241211	LLW - Smelter factory bricks	GAM	20370
PO5187001	19/06/2024	12/12/2024	DP-SRF-20241211	LLW - Smelter factory bricks	GAM	15170
PO5187002	1/07/2024	12/12/2024	DP-SRF-20241211	LLW - contaminated smelter dust	GAM	57350
PO5187002	1/07/2024	12/12/2024	DP-SRF-20241211	LLW - contaminated bulka bags	GAM	3970
PO5631001	30/09/2024	12/12/2024	DP-SRF-20241211	LLW - contaminated smelter dust	GAM	12970
PO5187001	4/06/2024	14/12/2024	DP-SRF-20241211	LLW - Smelter factory bricks	GAM	20370
PO5187001	19/06/2024	14/12/2024	DP-SRF-20241211	LLW - Smelter factory bricks	GAM	15170
PO4206001	4/05/2024	24/01/2025	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	170370
PO4206001	22/06/2024	24/01/2025	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	90160
PO4206001	2/07/2024	24/01/2025	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	74530
PO1485001	26/05/2021	25/01/2025	DP-SRF-20231018	Contaminated soil	Haz Solutions	45000
PO1485001	26/05/2021	25/01/2025	DP-SRF-20231018	Contaminated soil	Haz Solutions	45000
PO1485002	31/05/2021	25/01/2025	DP-SRF-20231018	Contaminated soil	Haz Solutions	6000
PO1485002	31/05/2021	25/01/2025	DP-SRF-20231018	Contaminated soil	Haz Solutions	6000
PO4206001	31/07/2024	25/01/2025	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	19040
PO4206001	1/08/2024	25/01/2025	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	90380
PO4206001	26/10/2024	25/01/2025	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	390600
PO5506001	23/08/2024	6/02/2025	DP-SRF-20241211	SCO Mineral sands tanks	Talison Lithium	10120
PO4206001	27/10/2024	10/02/2025	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	9780
PO4206215	15/11/2024	15/02/2025	DP-SRF-20230829	5x200L drums - NORM cont. soil	Hunters Hill	350
PO5506001	23/08/2024	16/02/2025	DP-SRF-20241211	LSA mineral sands	Talison Lithium	6290
PO1268001	8/03/2021	19/02/2025	DP-SRF-20241211	NORM Drill samples	SGS	1050
PO1268001	8/03/2021	19/02/2025	DP-SRF-20241211	Removed as average activity concentration is under 30 Bq/g	SGS	1050
PO1587001	19/08/2021	16/03/2025	DP-SRF-20240124	Pigging wastes	Zinfra, NSW	391
PO5373002	15/11/2024	16/03/2025		NORM pigging waste	Zinfra	0.07
PO3349001	15/12/2022	22/01/2025	EXEMPT material	Co60 Nucleus check sources 1uCi	NSW Dept of Ed	0.1
PO3349001	15/12/2022	22/01/2025	EXEMPT material	Co60 Nucleus check sources 1uCi	NSW Dept of Ed	0.1
PO3349001	15/12/2022	22/01/2025	EXEMPT material	Cs137 Nucleus check sources 5uCi	NSW Dept of Ed	0.1
PO3349001	15/12/2022	22/01/2025	EXEMPT material	Check source Cs137 0.7uCi	NSW Dept of Ed	0.1
PO3349001	15/12/2022	22/01/2025	EXEMPT material	Nucleus check source Sr90 1/10 uCi	NSW Dept of Ed	0.1
PO5784001	15/11/2024	22/01/2025	EXEMPT material	Check source	SGS Qld	0.1
PO5784001	15/11/2024	22/01/2025	EXEMPT material	Check source	SGS Qld	0.1
PO5784001	15/11/2024	22/01/2025	EXEMPT material	Check source	SGS Qld	0.1
PO5784001	15/11/2024	22/01/2025	EXEMPT material	Check source	SGS Qld	0.1
PO5784001	15/11/2024	22/01/2025	EXEMPT material	Check source	SGS Qld	0.1
PO5784001	15/11/2024	22/01/2025	EXEMPT material	Check source	SGS Qld	0.1
PO5784001	15/11/2024	22/01/2025	EXEMPT material	Check source	SGS Qld	0.1
Total					1144.69	

2.3.3 Key Characteristics

Table 2-6 summarises the status of compliance with the authorised extent of the proposal (Table 2 of Schedule 1 of MS 1078).

Table 2-6 – Compliance status of key characteristics, Table 2, Schedule 1 MS 1078

Requirement		Status	Further Information
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 regarding the maximum **temporary waste storage time of 12 months** during the reporting period.
Key Characteristic	**Description**		
Mine pit/waste cells	Clearing up to 202.3 hectares of native vegetation within a 1,061 hectare development envelope	Compliant	As of 6 July 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 hectare development envelope	Compliant	As of 6 July 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 62,856.58tonnes (normalised) of waste (the sum of controlled waste and unsealed radiological waste) was received during the reporting period.
Temporary waste storage on surface	up to 15,000 tonnes	Compliant	A cross check of waste received against waste permanently disposed confirmed that the temporary waste storage limit of 15,000 tonnes was not exceeded at any point during the reporting period.
Maximum temporary storage time	up to 12 months	Non-compliant	The 12 month storage requirement was exceeded during the reporting period (see Table 3.3).
Waste (including treated waste) disposed to waste cells	up to 280,000 tonnes per annum	Compliant	A total of 69,314.16tonnes (normalised) of waste was permanently disposed of during the reporting period.
Water use	up to 0.18 gigalitres (180,000m^3) per annum	Compliant	A total of 0.049 gigalitres (48,732 m^3) was used on site during the reporting period.

2.4 Decommissioning

No decommissioning activities were conducted during the reporting period.

3 DETAILS OF FINDINGS

3.1 Compliance Status

Table 3-1 provides a summary of the performance categories in respect to the compliance status for each requirement of EPBC 2015/7478 as defined in *Annual Compliance Report Guidelines* (Commonwealth of Australia, 2014, p.9).

Table 3-1 – Compliance status terms

Compliance Status Term	Definition
Compliant	'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Non-compliant	A designation of 'non-compliance' has been given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not Applicable	A designation of 'not applicable' has been given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.

The overall status of compliance with the audit elements of EPBC 2015/7478 Conditions for the reporting period is summarised in Table 3-2.

Table 3-2 – Overall compliance assessment of EPBC 2015/7478

Number of Audit Elements Compliant	Number of Audit Elements Non-compliant	Number of Audit Elements Not Applicable
19	1	7

The non-compliant condition is summarised in Table 3-3. The table includes a discussion of the compliance status and corrective and preventative actions for improvement.

Table 3-3 – Summary of EPBC 2015/7478 non-compliant conditions

Condition No.	Condition	Compliance Status	Comments and corrective actions
A.1	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1 [of MS 1078], 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, 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).

3.2 Environmental Management Plans

Table 3-4 summarises the status of management plans required under EPBC 2015/7478 during the reporting period.

Table 3-4 – Submitted and approved management plans

Condition No.	Management Plan	Date Prepared / Revised	Approval Date
A.2.1	Deep Groundwater Monitoring and Management Plan (DGMMP)	15 May 2020	29 May 2020
A.1	Leachate Monitoring and Management Plan (LMMP)	7 May 2020	14 May 2020

The LMMP was approved by the CEO of The Department of Water and Environmental Regulation (DWER) as required by Conditions 9-2 and 9-3 of Ministerial Statement 1078; however, it is a requirement of the recently issued MS1234 (December 2024) that the LMMP must be updated.

Implementation of these plans is discussed in Appendix A.

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 (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 EPBC 2015/7478, dated 7 January 2019. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. 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 and does not give legal advice. Except as required by law, no third party may use or rely on this report unless otherwise agreed by Tellus in writing. To the extent permitted by law, Tellus expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this report.

5 REFERENCES

5.1 Supporting, verifying information, documentation

[01] Tellus, 2025a. Compliance Assessment Report No. 7 2024-2025 Ministerial Statement 1078.	Report
[02] Tellus, 2025b. Sandy Ridge – Biannual Groundwater Monitoring Event 9, April 2025. Summary Letter Report, June 2025.	Report
[03] Tellus, Leachate Monitoring and Management Plan, Version E, 7 May 2020, Ref: HS00-1760150200-49173.	Management Plan
[04] Tellus, 2020, Deep Groundwater Monitoring and Management Plan, V1, SR-11-MPL-003. 22November 2022.	Management Plan
[05] DAWE, Approval Letter, 2020, EPBC 2015/7478: Sandy Ridge Project – Deep Groundwater Monitoring and Management Plan, 29 May 2020.	Letter
[06] EMM, 2021. Groundwater Quality Trigger and Threshold Criteria – Sandy Ridge Facility. Report # P200582 RP1 March 2021	Report
[07] Landloch, 2020. Sandy Ridge Project: Baseline soil audit for the facility, Mt. Walton access road and Sandy Ridge Access Rd. October 2020	Report
[08] DWER Environmental Licence L9240/2020/1 (www.dwer.gov.au)	Licence
[09] DWER Works Approval W6243/2019/1 (www.dwer.gov.au).	Approval
[10] DWER, Letter, 2020, Sandy Ridge Facility Ministerial Statement 1078 Leachate Monitoring and Management Plan Approved, 14 May 2020, Ref: DWERDT280973; DWERT463.	Approval
[11] Tellus 2021. Surface Water Control Operational Procedure SR-08.511, February 2021	Procedure
[12] Tellus, Email, Tellus to DAWE, 2019, EPBC 2015/7478 Sandy Ridge Facility - commencement notification, 18 July 2019 @12:27pm.	Email
[13] DAWE, Email, DAWE to Tellus, 2019, EPBC 2015/7478 Sandy Ridge Facility - commencement notification, 18 July 2019 @2:31pm.	Email
[14] Letter, DAWE, 2019, Commencement of the Action – Sandy Ridge Project, WA (EPBC 2015/7478), Ref: 2015/7478, 20 August 2019.	Letter
[15] Tellus, 2024. Sandy Ridge Facility Compliance Report No.5 2023/2024.	Report
[16] Tellus, 2024 Letter to Karina Richards Assistant Director Approvals Compliance Section, Compliance and Enforcement Branch DCCEEW. RE: Notification of waste packages expected to exceed the 12-month temporary storage limit during the 2024-2025 reporting period. 28 June 2024.	Letter
[17] Tellus, 2025c. Sandy Ridge – Biannual Groundwater Monitoring Event 8, October 2024. Summary Letter Report, March 2025.	Report
[18] Tellus, 2023 Sandy Ridge Soil Audit – 2023.	Report
[19] EPA Report 1767 Sandy Ridge Facility – Alignment of Gate Waste Acceptance Tonnage. 4 June 2024.	Report
[20] Tellus, 2020, Deep Groundwater Monitoring and Management Plan, V1, SR-11-MPL-001. 1 May 2020.	Plan
[21] Tellus, 2016 Waste Acceptance Procedure TCO-6-SR-01400-GE-PRO-0001 August 2016	Procedure
[22] Tellus 2025 Letter to Karina Richards Assistant Director Approvals Compliance Section, Compliance and Enforcement Branch DCCEEW. RE: Notification of Anticipated Exceedance of the 12-Month Temporary Storage Limit – EPBC 2015/7478 Condition A1. 30 June 2025.	Letter

5.2 External references

A Commonwealth of Australia. 2014. Annual Compliance Report Guidelines.
B Commonwealth of Australia 2020 PFAS NEMP Version 2.0 – January 2020.

APPENDIX A - EPBC 2015/7478 AUDIT TABLE