TELLUS

Waste Minimisation Management Plan

Sandy Ridge

Effective Date: 13th October 2025

Version Date: 13th October 2025

Version 0

Company Proprietary Information

The electronic version of this management plan is the latest version. It is the responsibility of the individual to ensure that any paper material is the current version.

The printed version of this management plan is uncontrolled.

Disclaimer

Contents

ABBREVIATIONS

Term	Definition
CEO	Chief Executive Officer
DAWE	Department of Agriculture, Water and Energy (Commonwealth)
DCCEEW	Department of Climate Change, Energy, the Environment and Water (Commonwealth)
DWER	Department of Water and Environmental Regulation (WA)
EP Act	Environmental Protection Act 1986 (WA)
EPA	Environmental Protection Authority (WA)
EPBC Act	Environmental Protection and Biodiversity Conservation Act 1999 (Commonwealth)
GL/a	Gigalitres per annum
ha	Hectares
LLW	Low Level Radioactive Waste
MS 1078	Ministerial Statement Number 1078
MS 1152	Ministerial Statement Number 1152
MS 1234	Ministerial Statement Number 1234
NEPM	National Environmental Protection Measure
RSA	Radiation Safety Act 1975 (WA)
Tellus	Tellus Holdings Ltd
t	Tonnes
tpa	Tonnes per annum
WA	Western Australia
WAC	Waste Acceptance Criteria
WAP	Waste Acceptance Procedure
WARRS	Waste Avoidance and Resource Recovery Strategy 2030 (WA)
WMMP	Waste Minimisation Management Plan
WZG	Waste Zoning Guide

DOCUMENT STRUCTURE

The structure of this Waste Minimisation Management Plan (WMMP) is guided by the template requirements detailed in the 'Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (WA EPA, 2024).

The following table provides a list of the requirements as set out in WA EPA (2024) and shows where these requirements are addressed within this WMMP.

Reference (as per WA EPA Oct 2021)	Template Requirement (as per WA EPA Oct 2021)	Location in WMMP
1.	Document Control	Start of the document
2.	Executive Summary	Start of the document
2.1	Context, scope and rationale	Section 1
2.2	Proposal	Section 1.1
2.3	Key environmental factors	Section 1.2

Reference (as per WA EPA Oct 2021)	Template Requirement (as per WA EPA Oct 2021)	Location in WMMP
2.4	Condition requirements	Section 1.3
3.	Rationale and approach	Section 1.4
4.	Outcome-Based Monitoring and Management	Section 3
5.	Adaptive management and review of the WMMP	Section 3
6.	Stakeholder consultation	Section 4

EXECUTIVE SUMMARY

Aspect	Summary
Facility name	Sandy Ridge Facility
Proponent name	Tellus Holdings Ltd
Ministerial Statement number	MS 1234 (superseding MS 1078 and 1152).
Purpose of the WMMP	To guide waste management in a way that is consistent with relevant policy, regulation, and best practice.
Key environmental objectives	The Proposal's acceptance of waste volumes, types of waste and disposal methods: (a) are consistent with the principles of waste minimisation and disposal methods (b) align with Western Australia's Waste Avoidance and Resource Recovery Strategy 2030 (c) are consistent with diversion of relevant waste streams away from landfill where practicable (d) are consistent with waste being accepted from producers and/or suppliers who operate in accordance with a waste minimization policy consistent with the Western Australia's Waste Avoidance and Resource Recovery Strategy 2030 and recognised state and national product stewardship schemes (e) demonstrate, where practicable, that all other waste minimisation options have been considered before waste is destroyed (f) are reviewed every five (5) years and continuous improvements are implemented to ensure consistency with the above.
Condition clauses	B6-1, B6-2, C5
Project status	Construction: Completed October 2020 Operations: Commenced October 2020

1 CONTEXT, SCOPE AND RATIONALE

1.1. Proposal

Tellus Holdings Ltd. (Tellus) owns and operates the Sandy Ridge Facility (the Facility, the Project or the Site), which is Australia's only commercial-scale near-surface geological repository for Class IV and V waste. At the Site, kaolin is mined for later use (e.g. as a cell capping material, or potential export to Asia or the domestic ceramics market), and Class IV and V intractable and low-level radioactive wastes are disposed of within the void spaces created by the mining operations. The Facility is located approximately 75 kilometres north-east of Koolyanobbing, in the Shire of Coolgardie (Figure 1-1).

The Facility was granted Ministerial Approval on 26 June 2018 under Ministerial Statement 1078, (MS 1078) under the WA *Environmental Protection Act 1986* (EP Act) and from the Commonwealth Government Department of Climate Change, Energy, the Environment and Water (DCCEEW) (formerly Department of Agriculture, Water and the Environment [DAWE]), under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 7 January 2019 (EPBC2015/7478) (DEE, 2019).

Schedule 1 of MS 1078 authorised up to 100,000 tpa of Class IV and V waste to be accepted at the gate of its Sandy Ridge Facility, and up to 280,000 tpa of waste (including treated waste) to be disposed into the waste cells. On 9 July 2021, Tellus referred a Proposal to the WA Environmental Protection Authority (EPA) under Section 38 of the EP Act, proposing to align the tonnage of waste received at the gate with the approved tonnage of waste permitted for permanent isolation in the Site's waste disposal cells (up to 280,000 tpa).). A subsequent amendment under Section 46 was granted via MS 1152 relating to Financial Assurance requirements.

A revised proposal was submitted on 9 July 2021 to align the approved quantity of waste disposed (up to 280,000 tpa) with the volume received at the gate. This proposal was formally assessed at the Public Environmental Review (PER) level. The Environmental Review Document (ERD) was published in October 2023, and the EPA issued Report 1767 in June 2024. Following the EPA's assessment of the significant amendment to the proposal, MS 1234 was issued on 13 December 2024, and superseded MS 1078 and MS 1152.

The EPA determined on 15 September 2021 that the Revised Proposal is a significant amendment to the original Approved Proposal and required formal assessment at the Public Environmental Review (PER) level. Following the publishing of the Environmental Review Document (ERD) on 5 October 2023, the PER period spanned from 5 October to 15 November 2023. Tellus responded to submissions on 11 April 2024. The EPA published its report (1767) on the assessment on 4 June 2024. MS 1234 was issued on 13 December 2024.

The authorised extent of physical and operational elements of the Facility per MS 1234 is presented Table 1-1.

Table 1-1 Authorised extent of physical and operational elements of the Facility

Element	Proposed extent
Physical elements	
Mine pits/waste cells	Clearing up to 202.3 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
Waste cap design	2.0 metres (m) capillary break (screened and gap-graded material)
Operational elements	
Wastes permitted	Acceptance of only Class IV & V waste
Class IV and V wastes accepted at gate	Up to 280,000 tonnes tpa

Element	Proposed extent
Waste (including treated waste) disposed to waste cells	Up to 280,000 tpa
Waste origin	Only wastes generated within WA, other Australian States and Territories, and the Australian Exclusive Economic Zone
Water use	Up to 0.18 Gl/a
Wastes permitted	Acceptance of only Class IV & V waste
Class IV and V wastes accepted at gate	Up to 280,000 tonnes tpa
Timing elements	
Maximum temporary surface storage time	Up to 12 months, or as agreed by the CEO
Project life	25 years

1.1.1. Purpose of this document

This Waste Minimisation Management Plan (WMMP) has been prepared to address the requirements of Condition B6-2 of MS 1234.

The WMMP aims to align with the objectives of the West Australian government's Waste Avoidance and Resource Recovery Strategy 2030 (WARRS). Tellus supports the intent of this Strategy which provides a vision for Western Australia to be sustainable, low-waste, circular economy.

Whilst this WMMP defines measures and provides guidance on waste minimisation initiatives to be implemented by Tellus, achievement of WARRS objectives must be considered in the context of the limitations in Tellus' ability to influence the necessary practices and strategies of upstream waste producers of whom Tellus has limited or no operational control over.

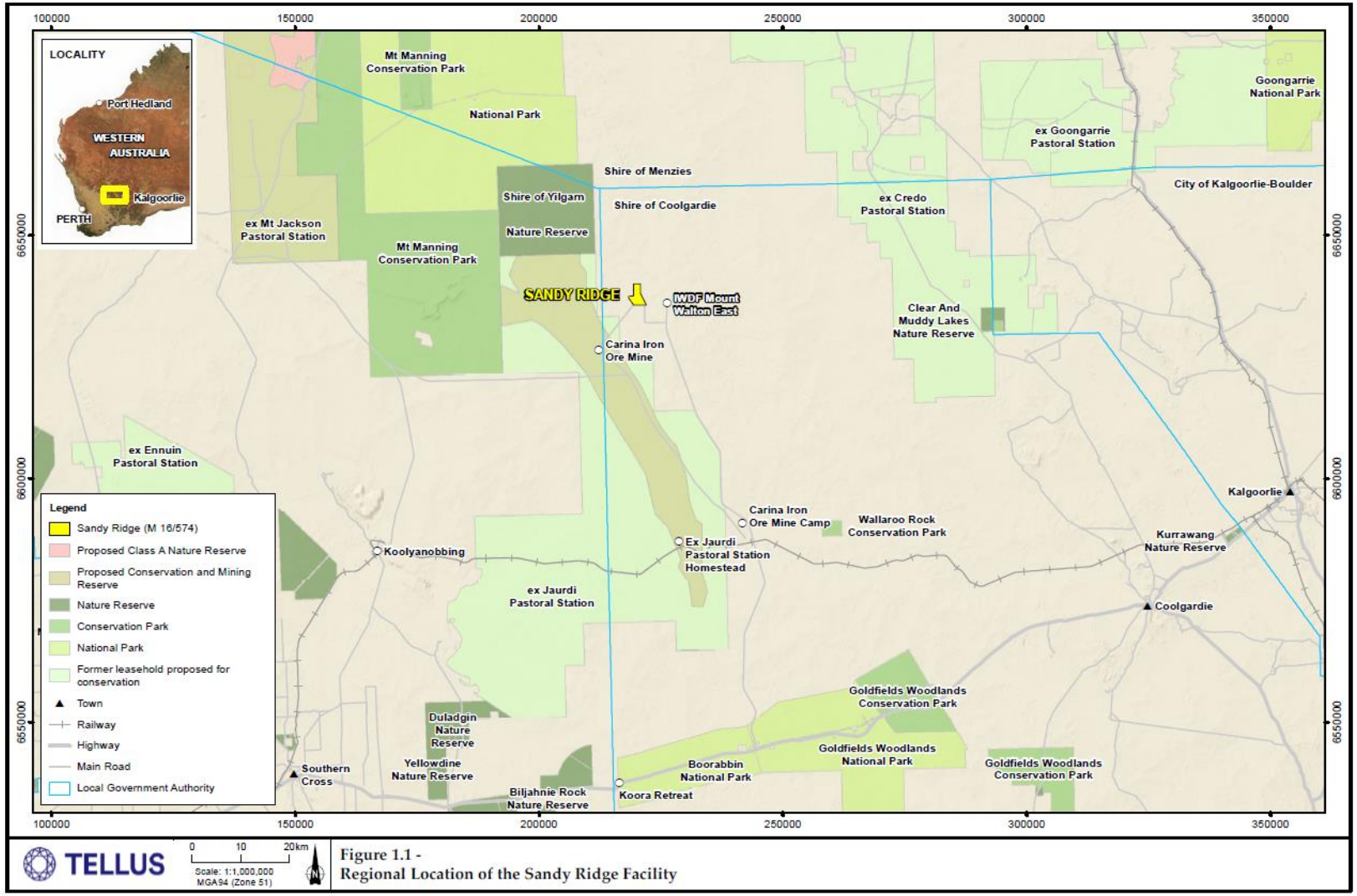

Figure 1-1: Regional location of the Sandy Ridge Facility

1.2. Key Environmental Factors

This WMMP demonstrates how the EPA's objectives for the key environmental factors are met.

Table 1-2 lists the potential direct and indirect environmental impacts the Project may have on key environmental factors during operation, closure, and post-closure phases.

Table 1-2 Environmental Factors, Objectives and Potential Impacts

Factor	EPA Objectives	Potential Impacts
Inland (surface and ground) waters	That the quality of surface water and the quality, quantity and distribution of groundwater are maintained so that existing and potential uses, including ecosystem maintenance, are protected.	Potential contamination of the receiving environment (surface soil, natural drainage features, surface water and ground water). Potential contamination on site through inadequate storage, disposal or transport of wastewater, saline water, chemicals and fly-ash. Reduction in amenity and hygiene. Inefficient use of resources.
Terrestrial Environmental Quality	To maintain the quality of land and soils so that environmental values are protected.	

1.3. Condition Requirements

This WMMP has been developed to comply with the following conditions of Ministerial Statement 1234 (MS 1234) (Table 1-3).

Table 1-3 MS 1234 Conditions

Condition	Requirement	Where addressed
B6-1	The proponent must implement the proposal to meet the following environmental objectives: (1) The proposal's acceptance of waste volumes, types of waste and disposal methods:	Section 2
	(a) are consistent with the principles of waste minimisation and the waste hierarchy;	
	(b) align with Western Australia's Waste Avoidance and Resource Recovery Strategy 2030;	
	(c) are consistent with diversion of relevant waste streams away from landfill where practicable;	
	(d) are consistent with waste being accepted from producers and/or suppliers who operate in accordance with a waste minimisation policy consistent with Western Australia's Waste Avoidance and Resource Recovery Strategy 2030 and recognised state and national product stewardship schemes;	
	(e) demonstrate, where practicable, that all other waste minimisation options have been considered before waste is destroyed;	
	(f) are reviewed every five (5) years and continuous improvements are implemented to ensure consistency with the above.	
B6-2	The proponent must prepare a waste minimisation plan that satisfies the requirements of condition C5 and demonstrates how the waste minimisation environmental objectives in condition B6-1 will be achieved and submit it to the CEO.	This document

C5-1	The environmental management plans required under conditions B2-3, B3-2 and B6-2 must contain provisions which enable the achievement of the relevant objectives of those conditions and substantiation of whether the objectives are reasonably likely to be met, and must include: (1) management actions; (2) management targets; (3) contingency measures if management targets are not met; and (4) reporting requirements.	Section 2.2
C5-2	The environmental management plan required under condition B6-2 is also required to: (1) provide a protocol or procedure for the five (5) yearly review of the WMMP to ensure that the WMMP is meeting the objective specified in condition B6-1	Section 3
C5-3	Without limiting condition C5-1, the failure to achieve an environmental objective, or implement a management action, regardless of whether contingency measures have been or are being implemented, represents a non-compliance with these conditions.	n/a

1.4. Rationale and approach

The rationale for this WMMP is to demonstrate how Tellus applies the waste hierarchy and circular economy principles within the unique context of the Sandy Ridge Facility. While the Facility's primary role is the safe, long-term isolation of Class IV and V wastes that cannot be further treated or recovered, this plan outlines how Tellus minimises waste generation from its own construction and operational activities, and how it engages with customers to encourage minimisation at source prior to disposal.

The approach is guided by:

- Achieving the EPA's objectives for waste minimisation, as outlined in Section 1.2.
- Meeting the Ministerial condition requirements for waste minimisation under MS 1234 (Section 1.2).
- Operating within the policy and legislative framework relevant to waste management and minimisation, which underpins Tellus' operational, closure, and social licence in Western Australia (Section 1.4.1).

1.4.1. Policy and Legislation

1.4.1.1. Waste minimisation

Tellus is a Class IV and V Facility and therefore the potential to further minimise waste at the Facility may be limited. Tellus has however established practices and procedures to reduce the volume of waste received and make provision for future reuse where possible and practicable.

The principle of waste minimisation is that all reasonable and practicable measures should be taken to minimise the generation of waste and its discharge into the environment (EPA WA, 2023).

The waste hierarchy is a framework for managing waste within a circular economy. Waste management options are ranked in order of their environmental desirability over the resource life cycle, considering both direct and indirect impacts. The hierarchy prioritises the avoidance of waste, followed by reuse, reprocessing, recycling, and energy recovery, with disposal as the least desirable treatment, used only when other options are not viable (Waste Authority, 2018). This approach helps focus attention and efforts where the greatest efficiencies in cost, time, and resources can be achieved (NSW EPA, 2014). The circular economy model aims to retain resources in circulation for as long as possible, extracting maximum value before recovering and regenerating products and materials at the end of their service life. This contrasts with the traditional linear economy, where resources are created, used, and disposed following their single use. The circular economy promotes treating 'waste' materials as resources (Awino & Apitz, 2022).

1.4.1.2. Western Australia's Waste Avoidance and Resource Recovery Strategy 2030

The vision of the WA Waste Avoidance and Resource Recovery Strategy 2030 (WARRS) (Waste Authority, 2019) is for Western Australia to become a sustainable, low-waste circular economy where human health and the environment are protected from the impacts of waste. The strategy defines three objectives:

1. Avoid – Western Australians generate less waste
2. Recover – Western Australians recover more value and resources from waste
3. Protect – Western Australians protect the environment by managing waste responsibly.

Each objective has associated targets, as follows:

Avoid

- 10% reduction in waste generation per capita by 2025
- 20% reduction in waste generation per capita by 2030

Recover

- Increase material recovery to 70% by 2025
- Increase material recovery to 75% by 2030
- Recover energy only from residual waste
- No more than 15% of waste generated in Perth and Peel is landfilled by 2030
- All waste facilities adopt environmental protection better practice by 2030.

1.4.1.3. Better practice management of hazardous wastes

Better practice hazardous waste management can sometimes contrast with the principles of the waste hierarchy (Ascend, 2022). While the waste hierarchy promotes reuse, recycling, and energy recovery above containment, these options may not always align with optimal hazard mitigation and environmental protection. Protecting human health and the environment and preventing environmental harm may necessitate choosing a lower-order option in the waste hierarchy. In such cases, the lower-order option can result in a better overall environmental outcome. It is crucial to prioritise harm protection when applying the waste hierarchy and circular economy principles to hazardous wastes.

1.4.1.4. Product stewardship

Product stewardship recognises that product producers have a responsibility for the management of their products throughout their life (Product Stewardship Centre of Excellence, 2024). These schemes support the environmentally sound management of products and materials over their life. Schemes can be industry-led voluntary schemes, co-regulatory arrangements between industry and government, or mandatory schemes under law (DCCEEW, 2023).

Current product stewardship schemes include (DCCEEW, 2023):

- Tyres – Tyre Stewardship Australia promotes the development of viable markers for tyre-derived products
- Batteries – The Battery Stewardship Scheme 'B-cycle' is a national battery collection network that recovers and recycles used hand-held batteries.

1.4.1.5. Basel Convention

The *Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal* (Basal Convention) regulates the international movement of hazardous wastes. Australia, a founding signatory since 1992, adheres to this convention to ensure the environmentally sound management of hazardous wastes.

Under the Basel Convention, the movement of hazardous wastes requires the prior informed consent of all involved countries. This consent is granted only if it is demonstrated that the hazardous wastes will be transported and disposed of in an environmentally sound manner. The Convention provides a framework for assessing hazardous characteristics, aligning with dangerous goods classification approaches, which is foundational for Australia's definition, classification, and management of hazardous wastes.

1.4.1.6. Regulatory framework

The following legislation is relevant to waste management and minimisation at the Sandy Ridge Facility.

Table 1-4 Relevant legislation

Legislation	Description
International	
Basel Convention	Regulates the international movement of hazardous wastes
National Legislation	
Hazardous Waste (Regulations of Exports and Imports) Act 1989	Regulates the movement of hazardous wastes in and out of Australia, ensuring compliance with the Basel Convention.
Subsidiary	
Australian Code for the Transport of Dangerous Goods by Road & Rail	Provides guidelines for the safe transport of dangerous goods, ensuring compliance during transportation.
Australian/New Zealand Standard AS/NZS 3833	Sets standards for the storage and handling of mixed classes of dangerous goods. Tellus will adopt the segregation protocols presented in AS/NZS 3833 for all waste materials that are stored on site prior to in-cell permanent isolation.
National Environmental Protection (Movement of Controlled Waste between States and Territories) Measure 1998	Provides a national framework for managing the movement of controlled wastes, ensuring proper tracking, notification, and licensing.
State Legislation	
Environmental Protection Act 1986 (WA)	Governs environmental protection in Western Australia, including waste management practices. Authorised under MS 1234
Waste Avoidance and Resource Recovery Act 2007 (WA)	Promotes waste avoidance and resource recovery, aligning with the principles of the circular economy.
Radiation Safety Act 1975 (WA)	Regulates the keeping and use of radioactive substances. LLW acceptance, storage and disposal at the Facility is currently approved under the RSA via Site Registration RS 210/2018 30289.
Dangerous Goods Safety Act 2004 (WA)	Outlines responsibilities and penalties for handling, storing, or transporting dangerous goods. The Sandy Ridge Facility has a Dangerous Goods Site licence under the Act.
Subsidiary	
Dangerous Goods Safety (Storage and Handling of Non-Explosives) Regulations 2007	Introduces modern safety standards for the manufacture, processing, storage, use, and disposal of dangerous goods.
Landfill Waste Classification and Waste Definitions 1996 (as amended 2019)	Provides detailed descriptions of the five different landfill classifications used in Western Australia. The Facility has been planned such that it can safely receive and store both Class IV and V wastes.

Legislation	Description
Radiological Safety (General) Regulations 1983 (WA)	Provides specific guidelines for the safe handling, transport, and disposal of radioactive materials.

1.4.1.7. Licences

Domestic and commercial landfills are classified based on their capacity to accept waste defined under the WA *Landfill Waste Classification and Waste Definitions* (DWER, 1996, amended 2019). The Sandy Ridge Facility originally gained approval under MS 1078 (now superseded by MS 1234) and Licence L9240/2020/1 to accept Class IV and V wastes for disposal and a Site Registration permitting disposal of LLW. The Facility is authorised to provide the State with a safe and regulated means to receive and store both Class IV and V wastes.

Some of these materials may be classified as dangerous or hazardous goods or controlled wastes, such as wastes listed under Schedule 1 of the *National Environment Protection (Movement of Controlled Waste between States and Territories) Measure 1998* (NEPM) 75. The Facility has a Dangerous Goods Site Licence under the *Dangerous Goods Safety Act 2004.*

LLW acceptance, storage, and disposal at the Facility are currently approved under the WA *Radiation Safety Act 1975* (RSA) via Site Registration RS 210/2018 30289.

1.4.2. Waste management at Sandy Ridge

Sandy Ridge provides a solution to manage complex and intractable wastes that are not suitable for other resource recovery, treatment or waste disposal pathways. These wastes contain contaminants or properties that present an unacceptable risk to human health or the environment, requiring a higher level of protection than provided by conventional disposal pathways.

The Facility accepts LLW including Naturally Occurring Radioactive Material often found in mineral sands, rare earth and oil and gas processing facilities, as well as disused sealed radioactive sources used in the construction, industrial processing and medical industries.

Insofar as influencing waste management measures and outcomes in accordance with the WARRS, Tellus' primary initiatives relate to how its construction and operational activities are implemented at Sandy Ridge. Notwithstanding, as discussed in Section 1.5.3, Tellus will continue to actively promote and encourage its customers that generate the wastes at source to align their practices with the WARRS objectives and conform to the waste hierarchy prior to adopting Sandy Ridge as a final disposal option.

1.4.2.1. Accepted wastes

Some of the waste types received at Sandy Ridge include:

- Nickel compounds (D210)
- Lead and lead compounds (D220)
- Non-toxic salts (D300)
- Waste mineral oils unfit for their intended purpose (J100)
- Per- and polyfluoroalkyl substances (PFAS) contaminated materials (M270)

Currently approved chemical and radiological wastes received at Sandy Ridge are listed in the Licence (L9240/2020/1). Total quantities by waste type are reported annually to DWER in accordance with the Licence.

1.4.2.2. Disposed wastes

Some of the waste types disposed of at Sandy Ridge include:

- Nickel compounds (D210)
- Lead and lead compounds (D220)
- Non-toxic salts (D300)

- Waste wood-preserving chemical (H170)
- Waste mineral oils unfit for their intended purpose (J100)
- PFAS contaminated materials (M270)

Currently approved waste types that are permanently disposed at Sandy Ridge are listed in the Licence (L9240/2020/1).

1.4.2.3. Waste acceptance

Before waste can be accepted for storage or permanent isolation at the Facility, the waste must meet:

- All environmental approvals and licences issued by regulators
- Sandy Ridge Chemical Waste Acceptance Criteria (CWAC)
- Sandy Ridge Chemical Waste Acceptance Procedure (CWAP)
- Sandy Ridge Waste Zoning Guide (WZG).

All waste is assessed by trained and qualified staff prior to acceptance being granted.

1.4.2.4. Waste characterisation

Waste characterisation is a three-stage process:

- Level 1: Detailed Characterisation: thorough determination of the characteristic properties of the waste
- Level 2: Compliance testing: periodic testing of regularly arising wastes to determine whether a waste complies with licence conditions and whether a waste with known properties has changed significantly
- Level 3: On-site verification: rapid checks to confirm waste matches the detailed characterisation and compliance testing.

1.4.2.5. Gated Waste Acceptance Procedure

The Gated Waste Acceptance Procedure is a staged process to assess that waste types accepted at the Facility meet established criteria. The procedure determines whether the waste will be accepted at the Facility. In addition to considering the specific characteristics of the waste, consideration is also given to how the waste will perform in storage conditions. Wastes will need to pass through all waste acceptance 'criteria gates' to be accepted for permanent isolation at the Facility. Wastes that do not meet the acceptance criteria may need to be rejected before transport or returned to the customer if found to not meet acceptance criteria on arrival at the Facility.

The criteria gates are summarised below and detailed in the Chemical Waste Acceptance Procedure:

1. *Is the waste on the potential waste category list?*
2. *Has the waste been identified as likely suitable for future recovery?*
3. *Gases, liquids and sludges*
    a. *Is the waste a gas?*
    b. *Is the waste a liquid or sludge?*
4. *Does the waste possess hazardous characteristics which, in the conditions of storage, are explosive, corrosive, oxidising, or highly flammable?*
    a. *Is the waste Explosive (H1)?*
    b. *Is the waste Highly Corrosive (H8)?*

   c. *Does the waste have oxidising potential (H5.1)?*
   d. *Is the waste a flammable liquid (H3)?*
   e. *Is the waste a flammable solid (H4.1)?*
5. *Is the waste potentially self-combustible and liable to Auto-Ignition?*
6. *Can the waste generate a gas-air mixture which is toxic or explosive?*
7. *Is the waste biodegradable?*
8. *Is the waste an infectious hospital or clinical waste (H6.2)?*
9. *Does the waste have the potential to be infectious to animals or humans (H6.2)?*
10. *Is the waste tyres?*[1]
11. *Conditions of Storage criteria. Can the waste and/or its container release liquid, or react with the host clay in the facility which could affect either the operational and/or post-closure safety of the facility?*
    a. *Can the waste release free liquid in the conditions of storage?*
    b. *Does the waste possess the potential for an adverse reaction with the host clay?*
    c. *Does the waste have the potential to yield another hazardous substance (H13)?*
12. *Is the waste radioactive? If yes, proceed to Radiological WAP.*
13. *Does the waste meet the packaging criteria?*

1.4.3. Storage and disposal

1.4.3.1. Storage

Materials are stored above ground following delivery, including the time awaiting sampling, analysis, and management prior to movement for in-cell storage. Tellus provides both short-term (less than 12 months, or as agreed by the CEO) and long-term (greater than 12 months) safe storage solutions. For long-term storage, wastes may be stored in mono-cells, allowing for potential future reuse or recycling opportunities.

1.4.3.2. Permanent isolation

Wastes that are deemed suitable for acceptance may be placed below ground indefinitely in a waste cell.

1.4.3.3. Placement in cell

Voids created from mining, termed ‘pits’ during excavation and ‘waste cells’ once ready for waste activities, are used for the permanent isolation of hazardous and intractable wastes. Waste cells are filled in layers, with similar wastes grouped together. All spaces between waste packages are backfilled and compacted to minimise air or void space and promote long-term stability. Each layer is compacted. Waste cells are covered by a mobile roof canopy, which can be relocated to the next waste cell on completion.

1.4.3.4. Backfilling of waste cells

Once the base layer of waste packages is in place, backfilling is done to fill any voids, minimising the risk of subsidence. Additional layers of waste are backfilled and compacted in the same manner. After the final waste layer is placed, capping layers are used to fill the remaining void and cover the completed waste cell. The final

[1] In certain circumstances, tyres or the products of tyre reprocessing may be accepted for permanent isolation at the Facility, if it can be demonstrated that the waste can be encapsulated or isolated, or transformed chemically and/or physically to a form that is no longer flammable. Used tyres are not accepted.

capping profile and specifications are described in the Waste Facility Decommissioning and Closure Management Plan (WFDCMP).

1.4.4. Waste zoning

Tellus has developed a Waste Zoning Guide (WZG) (Tellus 2025) which outlines how radiological and chemical wastes are grouped to avoid incompatibility. Storage requirements including location, duration, packaging and inspections are specified in Licence L2920/2020/1.

Many of the wastes that Tellus accepts at the Facility are classified as Dangerous Goods. While in surface storage, all Dangerous Goods are stored and segregated in accordance with the Dangerous Goods Site Licence (Licence number DGS022452).

When waste is placed into a waste cell for permanent isolation, waste zoning protocols are implemented, as detailed in the WZG. This zoning approach ensures chemical and radiological compatibility, supports long-term stability, and increases the potential for future recovery of materials for beneficial use where feasible.

Although radiological materials disposed of at the Facility are not intended to be retrieved, Tellus acknowledges that future advances in technology may make retrieval beneficial. Accordingly, Tellus maintains detailed records of all radiological disposal operations, including GPS coordinates and elevation, which will be made available to the relevant authority upon closure of the Facility.

Higher-activity wastes are placed at greater depth within the waste cells to minimise the likelihood of inadvertent intrusion, in accordance with the Safety Case and associated safety assessments.

1.5. Cell construction and operation

1.5.1. Waste generated during construction

During the construction of future waste cells at Sandy Ridge, various types of waste are anticipated. The expected waste generation is outlined as follows:

- General waste: Approximately one to two cubic metres of general waste will be produced weekly from the office and worker accommodation village.
- Construction waste: Minimal residual construction waste is expected, with an estimated 10 cubic metres per month once electrical works commence until the dome is commissioned for each new waste cell
- Workshop waste: The workshop is projected to produce around 2,000 litres of waste oil per month once mining operations begin, with an estimated 1,000 litres per month prior to the commencement of mining.

1.5.2. Waste minimisation – construction and operation

Tellus will apply the waste hierarchy where possible and practicable to waste generated during construction and operational activities at Sandy Ridge, exploring opportunities to minimise the volume of waste disposed, as set out in Table 1-5.

Table 1-5 Application of waste hierarchy to site-generated waste

Hierarchy option	Application		
	General waste	Construction waste	Oil waste
Avoidance	Implement efficient material planning and procurement to avoid excess waste from office and crib buildings	Require contractors and suppliers to consider using reusable steel racking/stillages and eliminate single-use timber, plastic and cardboard packaging, where practicable	Use machinery and equipment that require less frequent oil changes to minimise waste oil generation

Hierarchy option	Application		
	General waste	Construction waste	Oil waste
	Products and materials containing recycled content or packaging shall be used in preference to non-recycled (virgin) materials		
Reuse	Reuse office supplies and furniture instead of discarding them, where practicable Provide reusable food and drink containers Use of reusable PPE such as Versaflo Respiratory Systems and reusable chemical protection suits in place of single-use PPE when practicable	Reuse materials on-site or in other projects, where practicable including: Inflatable dome covers will be reused for future waste cells Formwork to be reused where possible Felled woody vegetation to be incorporated in topsoil stockpiles to promote revegetation and/or used as habitat logs Reuse of bore casings in future monitoring bores	Reuse waste oil for lubrication or other industrial purposes where possible
Reprocessing	Not applicable	Reprocess materials for use in new construction projects – e.g. silcrete overburden in windrows	Arrange for collection and reprocessing of waste oil by licensed contractor/s
Recycling	Recycling stations are located at the Village, Admin Office, Laboratory, Workshop and Inspection Bays. Recycling facilities include: Drink containers Cardboard and paper Scrap metal eWaste Batteries and printer cartridges	Segregate and recycle where practicable the following materials: Scrap metal Recyclable plastics Untreated timber Cable reels	Recycle waste oil through certified recycling programs to convert it into usable products
Energy recovery	Although direct energy recovery from site-generated general waste is not viable due to distance and minimal volumes, Sandy Ridge facilitates metropolitan waste-to-energy schemes through permanent isolation of Air Pollution Control Residues (APCr).	Not expected to be relevant to construction activities at Sandy Ridge.	Not expected to be generated at volumes that would enable cost effective establishment of energy recovery infrastructure and/or activities relevant to construction activities at Sandy Ridge
Disposal	Wastes will be disposed of responsibly, only after all other practicable options are exhausted.		

1.5.3. Customer consultation and ongoing waste minimisation

Customers are aware that the concentration of contaminants is beneficial as it reduces transport and cell placement costs. As a result, customers are incentivised to implement waste minimisation principles. Tellus will continue to consult with its customers regarding procedures and processes that may be applied to minimise the volume of Class IV and V waste at source, where practicable, before transport to Sandy Ridge for disposal.

1.6. Monitoring, auditing and reporting

1.6.1. Monitoring

All incoming waste undergoes rigorous monitoring through the WAP to maintain compliance with regulatory and Facility requirements. Waste characterisation thoroughly determines the properties and potential risks of the waste. Compliance testing involves periodic assessments to verify that wastes meet licence conditions and

detect any significant changes in their properties. Rapid checks are also conducted to confirm that wastes match the results of detailed characterisation and compliance testing.

During storage, materials are monitored above ground, including sampling, analysis, and management prior to in-cell storage. In-cell monitoring provides for proper placement and backfilling of waste cells to minimise risks such as subsidence and exposure. Waste zoning protocols are implemented to group compatible waste types and prevent adverse reactions, following Australian Standard AS/NZ 3833 for dangerous goods segregation. This comprehensive monitoring provides for safe and compliant management of all waste materials.

Regular audits are conducted to verify compliance with these monitoring procedures.

1.6.2. Auditing and reporting

Auditing and reporting actions relevant to waste are conducted as shown in Table 1-6.

Table 1-6 Auditing and reporting

Report	Description	Frequency	Responsible personnel	Regulator
Annual Independent Waste Audit	Waste audits are conducted annually, in accordance with Condition B9 of MS 1234. The audit addresses site operations, including whether: • Each waste is uniquely identified • The origin, quantity, and characterisation of each waste is recorded • The waste acceptance criteria and procedures have been adhered to • All required regulatory approvals and permits were in place for transport and disposal of the waste • There is a clear and documented chain of custody from client to waste receival • The final location of each waste in the waste cell is accurately recorded using the quadrat system • All regulatory requirements have been met, and • Other options have become available to reuse, recycle, or recover wastes that are being accepted at the Sandy Ridge Facility.	Annual	Independent Waste Expert	Department of Water and Environmental Regulation (DWER)
Monthly environmental report	Summarises the management of site-generated wastes including: • Site-generated waste volumes and recycling activities • Waste-related environmental incidents • Results of environmental inspections including the Putrescible Landfill, Village, and Infrastructure Area.	Monthly	Environmental Manager	Tellus internal document

Report	Description	Frequency	Responsible personnel	Regulator
L9240/2020/1 Annual Environment Report	Prepared in accordance with Condition 31 and Table 6 of Licence L9240/2020/1. The AER summarises: • Results of liquid-waste characterisation and QA/QC testing undertaken under Condition 16 and 17 of the licence (WIP and portable mixing operations). • A summary of all wastes accepted, treated, removed, and disposed of during the reporting period (Condition 28). • A summary of any pollution-control failures or incidents, and corrective actions taken. • A summary of complaints received and responses (Condition 31).	Annual	Environmental Manager	DWER

2 CONDITIONS

2.1. Condition B6-1

Condition B6-1 of MS 1234 requires this Plan to implement waste minimisation procedures and report its continuous improvement in waste minimisation. The proposed implementation actions are presented in Table 2-1.

Table 2-1 Condition B6-1 of MS1234

Condition	Requirement	Implementation
B6-1(1)	The Facility's acceptance of waste volumes, types of waste and disposal methods:	

(a)	Are consistent with the principles of waste minimisation and the waste hierarchy	Tellus is committed to managing waste in accordance with the waste hierarchy and is continually seeking opportunities to reuse, reprocess, and recycle waste. Permanent isolation minimises the amount of waste that is stored in temporary and often inappropriate storage locations. The Facility addresses the waste hierarchy by providing a solution for wastes that are a risk to human health and the environment and for which no other practicable alternatives are available. Given the cost associated with permanent isolation, waste producers have generally considered waste minimisation before sending waste to the Facility, incentivised by economics. The opportunity to avoid and reduce waste once received at the Facility is limited; however, the following waste management processes at Sandy Ridge support the principle of waste minimisation. **Waste Acceptance Procedure** The gated waste acceptance procedure includes the following questions: • Are there current options to reuse, recycle or recover the waste? • Can the waste be stored in the cell for future recovery and recycling? This framework reviews all incoming wastes for the ability to extract value prior to disposal. Given the remote location of Sandy Ridge and the expense of permanent storage and disposal, generally only wastes that require secure storage and disposal to protect human health and the environment are received at the Facility. All wastes received at the Facility are assessed through the WAP to determine whether there are any further opportunities to apply the waste hierarchy before disposal. Tellus also seeks opportunities to process wastes to concentrate and remove contaminants and produce material streams that can be reused, although due to transport costs, this typically occurs prior to wastes being received at the Facility. Additionally, Tellus can add value by promoting volume minimisation and potential pairing with other by-products to create recovered material products or displace virgin materials. **Hazardous waste** The Facility provides a geologically stable environment for storing hazardous materials and wastes. It also allows hazardous materials to be concentrated and (in some cases) separated from other materials, enhancing the opportunity for reuse or recycling. Management of hazardous materials in this way results in reduced volumes of material and aligns with waste minimisation principles. This practice is contrary to the common method of fixating or diluting hazardous compounds to facilitate their acceptance at landfills with a lower classification. **Storage for later recovery** Some wastes received at the facility may retain a residual value that is not practicable to exploit with existing technologies - these wastes are identified. Recycling and recovery opportunities for these wastes are periodically reviewed. Wastes are geolocated by quadrant to enable potential future retrieval. If reuse or recycling opportunities become available in the future, the waste can be retrieved from the cell. The robust containment and isolation offered by the waste cells protect the environment during the storage period. The long-term goal is to have monocells with specific wastes, facilitating future recovery where practicable and approved under all waste storage and other relevant regulations.

Condition	Requirement	Implementation
		Site-generated wastes All site-generated wastes are managed as per the waste hierarchy. Waste streams are monitored, including volumes, sources, waste types, and end-use or disposal locations. A waste inventory is used to identify waste streams and opportunities to avoid, reduce, reuse, and recycle each stream. Several initiatives have been developed through the application of the waste hierarchy, including: • Cardboard is baled and transported offsite for recycling • Drink bottles (cans, bottles, etc.) transported to Kalgoorlie for Containers for Change recycling • Non-contaminated scrap metal is recycled • Household batteries are recycled in Perth • eWaste is collected, for later recycling • Printer cartridges are recycled • Other materials that can potentially be reused or recycled (e.g. pipes, large cable reels) are collected, while research is conducted into reuse/recycling options. **Potential initiatives** Potential waste minimisation initiatives, include: • Commissioned exploration of the potential to reuse waste material mixed with kaolin in the creation of cell caps, roads, and hardstands • Beneficial use of extracted material – Tellus has approval to mine and sell kaolin (Mining Lease M16/540) • Investigating the use of combustion ash (e.g., from waste-to-energy facility), which may provide suitable immobilisation potential that would allow it to be used in place of cement • Investigating the mixing of compatible streams to displace other materials • Investigating sale and/or reuse of the inert gypsum byproduct formed from the neutralisation of acids with lime • Investigating the recovery of medically useful isotopes (e.g., Pb-212) from low-level radioactive waste streams to support advanced cancer treatments • Exploring the viability of establishing off-site waste depots, where waste could be received, assessed, sorted, aggregated, and/or treated prior to directing to reuse, reprocessing or recycling. Only Class IV and V residual waste that cannot be cost-effectively or practicably diverted from disposal would be sent to the Sandy Ridge Facility for placement in Class IV/V waste cell/s, while lower classes of residual waste could be reused or sent to an alternative lower-class landfill (i.e. Class I, II or III).

(b)	Align with Western Australia's Waste Avoidance and Resource Recovery Strategy 2030	The following targets of the WARRS are relevant to the Sandy Ridge Facility: • Increase material recovery to 70/75% • No more than 15% of waste generated in Perth and Peel is landfilled • All waste facilities adopt environmental protection better practice. Targets to reduce waste generation primarily apply to waste producers and are generally not applicable to the Facility, except for waste generated during construction and ongoing operations. While direct diversion of site-generated waste to energy recovery is not practicable due to the hazardous nature of wastes received and the relatively small volumes generated on site, Sandy Ridge contributes to waste-to-energy outcomes by providing for the safe, permanent isolation of Air Pollution Control Residues (APCr) produced by metropolitan waste-to-energy facilities. **Increase material recovery** The Facility reviews all incoming waste materials for potential reuse, recycling, repurposing or recovery opportunities before disposal. Geological repositories encourage the concentration of hazardous compounds, allowing other materials to be safely reused or recycled. **Divert waste from landfill** The Facility's WAP assesses all incoming waste for recovery and recycling opportunities before disposal. Waste streams with potential for future recycling or recovery are stored and periodically reviewed, allowing for retrieval and reuse when viable processes become available. Where practicable and where received quantities of waste material with potential for future re-use or reprocessing justify dedication of a waste cell to material from a single source, the viability of establishing a monofill cell for that waste material will be investigated on a case-by-case basis. **Adopt environmental protection better practice** After non-recoverable residual wastes have been accepted at the Facility, they must be stored and permanently isolated in a safe and environmentally responsible manner. The Facility adopts the following best practices: • Grouping and segregation: Waste materials are grouped into compatible waste-type groups that can be safely stored together. Dangerous Goods Segregation protocols are strictly followed, in accordance with Australian Standard AS/NZ 3833. This prevents incompatible materials from being stored together, preventing adverse reactions. • Waste zoning protocols: When waste is placed into a cell for permanent isolation, waste zoning protocols are implemented as outlined in the WZG. This guideline is designed to reflect the specific conditions of storage within the cell, ensuring that various wastes can be stored or permanently isolated without adverse reactions. • Backfilling and compaction: Following the placement of waste in the cell, layers are backfilled and compacted to promote long-term stability. This process minimises the risk of subsidence, which could have safety and environmental consequences.

Condition	Requirement	Implementation
		• Capping and sealing: After compaction, the cell is capped to minimise the risk of leachate generation and to prevent any potential environmental contamination. The capping process securely isolates the waste from the surrounding environment, providing the best possible safety and environmental outcomes. By implementing these rigorous procedures, the Facility manages all accepted wastes in a manner that prioritises environmental protection and safety, aligning with best practice and regulatory standards.
(c)	Are consistent with diversion of relevant waste streams away from landfill where practicable	Tellus is committed to diverting waste streams away from disposal cells wherever practicable, aligning with the principles of waste minimisation and the waste hierarchy. Diversion of waste is demonstrated in the following processes, detailed further in Condition B6-1(1)(a) above: • Incoming waste is assessed through the WAP, ensuring it is thoroughly assessed for potential reuse, recycling and recovery options. By evaluating these possibilities, the Facility can extract and repurpose valuable materials, reducing the volume of residual waste disposed. • Wastes are stored and geolocated for potential future retrieval and reuse. This practice prevents materials with future reuse or reprocessing potential from being permanently disposed of prematurely. • All site-generated wastes are managed according to the waste hierarchy, with several initiatives implemented to divert waste from landfill. • The Facility is continuously exploring new waste minimisation initiatives, seeking further opportunities and investigating options to divert waste from landfill. • As mentioned above, exploring the viability of establishing off-site waste depots, where waste could be received, assessed, sorted, aggregated, and/or treated prior to directing to reuse, reprocessing or recycling.

Condition	Requirement	Implementation
(d)	Are consistent with waste being accepted from producers and/or suppliers who operate in accordance with a waste minimisation policy consistent with the Western Australia's Waste Avoidance and Resource Recovery Strategy 2030 and recognised state and national product stewardship schemes	**Waste minimisation** Given the cost associated with permanent isolation, waste producers have generally exhausted all other management options (reuse, recycling, recovery) before sending waste to the Facility. Through the gated WAP (Step 2), options for reuse, recycling, and recovery are assessed to verify waste minimisation has been thoroughly considered. Only wastes that are not suitable for other reuse and recycling options are permanently isolated at Sandy Ridge. Tellus assists waste generators with studies to assess opportunities for material recovery prior to being sent to the Facility. This includes a partnership with the Cooperative Research Centre for Contamination Assessment and Remediation of the Environment (crcCARE), aimed at researching and developing new circular economy technologies. Additionally, by-product pairing is explored to reduce the use of raw materials, creating opportunities to combine waste with other by-products to produce new products or displace virgin materials. **Product stewardship schemes** Tellus seeks to make waste producers aware of product stewardship principles and schemes and how they can be applied to the waste generating process before seeking to send their residual waste to Sandy Ridge. Tellus will continue to stay up to date with relevant product stewardship schemes, ensuring waste producers can be made aware of current product stewardship schemes and their potential applicability to waste streams generated by customers.
(e)	Demonstrate, where practicable, that all other waste minimisation options have been considered before waste is destroyed	Waste is not destroyed at the Sandy Ridge Facility. Wastes are only permanently isolated in cell where all other options have been exhausted. Waste minimisation is demonstrated in the following processes, detailed further in Condition B6-1(1)(a) above: • Incoming waste is assessed through the WAP, ensuring it is thoroughly assessed for potential reuse, recycling and recovery options. By evaluating these possibilities, the Facility extracts and repurposes valuable materials, reducing the volume of waste disposed. • Wastes are stored and geolocated for potential future retrieval and reuse. This practice prevents materials with future potential being prematurely permanently disposed of. • All site-generated wastes are managed according to the waste hierarchy, with several initiatives implemented to divert waste from landfill. • The Facility is continuously exploring new waste minimisation initiatives, seeking further options to divert waste from landfill.

Condition	Requirement	Implementation
(f)	Are reviewed every five (5) years and continuous improvements are implemented to ensure consistency with the above	**Review** Tellus will review the contents of this WMP every five years, in accordance with Condition B6-1 (1)(f). Where necessary, Tellus will undertake revisions to reflect ongoing improvements and to align with relevant aspects of amendments to State and Commonwealth waste management policies and strategies. Any changes to the WMP will require approval by the CEO. WMP reviews will include: • Review relevant legislation and policy and address relevant changes since the last version • Evaluate waste minimisation performance at the Facility over the past five years • Identify gaps and areas for improvement • Consult key stakeholders where appropriate **Continuous improvement** Tellus will seek to continuously improve waste minimisation procedures through: • Identifying areas of opportunity for improvement • Verifying the effectiveness of current procedures • Documenting any changes in procedures resulting from process improvement • Regular review of waste recovery methods and technologies • Monitoring the status of relevant Product Stewardship Schemes **WARRS Review** Tellus recognises that the WARRS is currently under review (Waste Authority, 2024) and will review and amend this plan as necessary to align with relevant aspects of the revised WARRS.

2.2. Condition C5-1

Condition C5-1 of MS 1234 requires this Plan to include management actions, management targets, contingency measures if management targets are not met, and reporting requirements. These are addressed in Table 2-2. Further details on auditing and reporting are provided in Section 1.6.1.

Table 2-2 Condition C5-1 of MS 1234

Category/Scenario	Actions	Targets	Contingency measures	Reporting
Transition between Cell 1 and Cell 2	Coordinate waste-placement schedules to maintain Cell 1 capacity during Cell 2 construction. • Prioritise treatment of time-sensitive or capacity-critical wastes. • Monitor monthly waste received versus disposed. • Review Cell 2 progress reports and integrate with waste-management planning.	Zero lag time between Cell 1 decommissioning and Cell 2 commissioning	If modelling indicates Cell 1 capacity will be reached before Cell 2 is operational, request DWER approval to temporarily store wastes under the Cell 1 dome.	Progress monitored through Cell 2 construction reports.
Exceedance of 12-month Storage Limit	Maintain waste-tracking register to monitor storage age. Plan and sequence treatment campaigns to minimise backlog. Progress commissioning and operation of new treatment infrastructure.	All wastes permanently disposed within 12 months of receival (unless otherwise exempt)	If approaching 10 months: prioritise affected batches for treatment or disposal. Notify DWER of potential exceedance	MS1234 Annual Independent Waste Audit L9240/2020/1 Annual Environment Report

Category/Scenario	Actions	Targets	Contingency measures	Reporting
Diversion of non-hazardous outputs waste treatment from in-cell placement	Develop and verify methods to produce inert, non-hazardous gypsum from acid neutralisation. Undertake NATA-accredited laboratory testing to confirm classification as non-hazardous.	No placement of divertible, non-hazardous outputs (e.g. neutralisation gypsum) to the cell	Obtain DWER approval prior to reuse or off-site beneficial use. If analysis indicates material does not meet reuse criteria, reclassify and dispose in accordance with licence requirements.	NATA lab analysis of gypsum MS1234 Annual Independent Waste Audit L9240/2020/1 Annual Environment Report Additional reporting may be required in accordance with future approvals
General waste	Provide reusable food and drink containers Use reusable PPE where practicable Dedicated recycling stations throughout Facility Encourage staff participation in waste-minimisation initiatives	Maintain average waste generated per workday under 5.0kg during non-construction periods	If waste generation exceeds target, conduct source audit to identify major streams. Implement additional recycling or contractor review. Deliver staff refresher training on segregation and recycling.	Monthly reporting of waste generation and recycling rates in the Monthly Environmental Report.

3 ADAPTIVE MANAGEMENT AND WMMP REVIEW

Continuous improvement aims to reduce environmental impacts by embedding a cycle of monitoring, reporting, and implementing change (where required). The adaptive management approach involves adjusting management and mitigation measures through what is learned from:

- Evaluation of monitoring data
- Review of assumptions and uncertainties
- Re-evaluation of Project-related risks
- Increased understanding of the ecological regime
- External changes during the life of the Project

Ongoing improvement of this WMP will be achieved by regular evaluation of environmental management performance against established objectives, targets and policies. The continuous improvement process is designed to:

- Identify opportunities for improvement of environmental management and performance
- Determine the cause of causes of non-compliance or deficiencies
- Develop and implement a plan of corrective and preventative actions
- Verify the effectiveness of those actions
- Document changes to procedures resulting from improvement initiatives
- Compare performances against objectives and targets

In accordance with Condition B6-1(f), this document will be reviewed and updated as necessary no less than every five years.

Further refinements to this WMP may be triggered by new information obtained during future operational activities. Any changes will be managed in accordance with Tellus' Change Management procedure.

4 STAKEHOLDER CONSULTATION

In line with the commitment to review opportunities for future resource recovery, Tellus is actively involved in relevant industry bodies, such as the DWER Future Materials Group and Waste and Recycling Industry Association of WA. This involvement helps Tellus stay at the forefront of industry developments and best practices. Findings from these engagements will be documented in internal reports.

Due to potential confidentiality obligations with Tellus customers, the output reporting from these processes will not be publicly disclosed.

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