



SANDY RIDGE
Annual Compliance Report
2025-2026
EPBC 2015/7478

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

Prepared by

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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 <i>Environmental Protection Act 1986</i> 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	<i>Environmental Protection and Biodiversity Conservation Act 1999</i>
EPBC 2015/7478	EPBC Approval dated 7 January 2019
EP Act	<i>Environmental Protection Act 1986</i>
GME	Groundwater Monitoring Event
IBC	Intermediate Bulk Container
LMMP	Leachate Monitoring and Management Plan
LLW	Low-Level Radioactive Waste
MS 1078	Ministerial Statement 1078
MS 1234	Ministerial Statement 1234
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 within 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 2025 to 05 July 2026
Declaration of Accuracy In making this declaration, I am aware that sections 490 and 491 of the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (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	Executive 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 under Part B, condition 9 of EPBC approval 2015/7478 and the *Annual Compliance Report Guidelines* (Commonwealth of Australia, 2014). It covers 6 July 2025 to 5 July 2026.

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. Cell 1 operated during the reporting period while Cell 2 was under construction.

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

Of the 27 audit elements assessed, 19 were compliant, one was non-compliant and seven were not applicable. The non-compliance relates to waste stored beyond the maximum temporary storage period under condition A1-1 of MS 1234. The condition allows storage for up to 12 months, or for a longer period agreed by the CEO. The exceedances and corrective actions are detailed in Section 3.1. MS 1078 was superseded by MS 1234 in December 2024 and under MS1234, the equivalent condition for maximum temporary surface storage time (Condition A1) was 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 2025-2026 reporting period.

An 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. During the reporting period the Waste Neutralisation Plant was being commissioned. Tellus anticipates that full compliance with the temporary storage limits will be achieved within 2026-2027 reporting period.

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, 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 initially approved under Western Australian Ministerial Statement 1078 (MS1078) in June 2018. MS1078 was subsequently superseded by Ministerial Statement 1234 (MS1234), issued on 13 December 2024.

MS1234 authorises the mining of up to 280,000 tonnes per annum (tpa) of kaolin clay and the acceptance and permanent disposal of up to 280,000 tpa of Class IV and Class V waste. Waste acceptance, treatment and disposal activities are also regulated under DWER licence L9240/2020/1.

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 2025 to 6 July 2026 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 2024-25 report was published on the Tellus website in September 2025.

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.

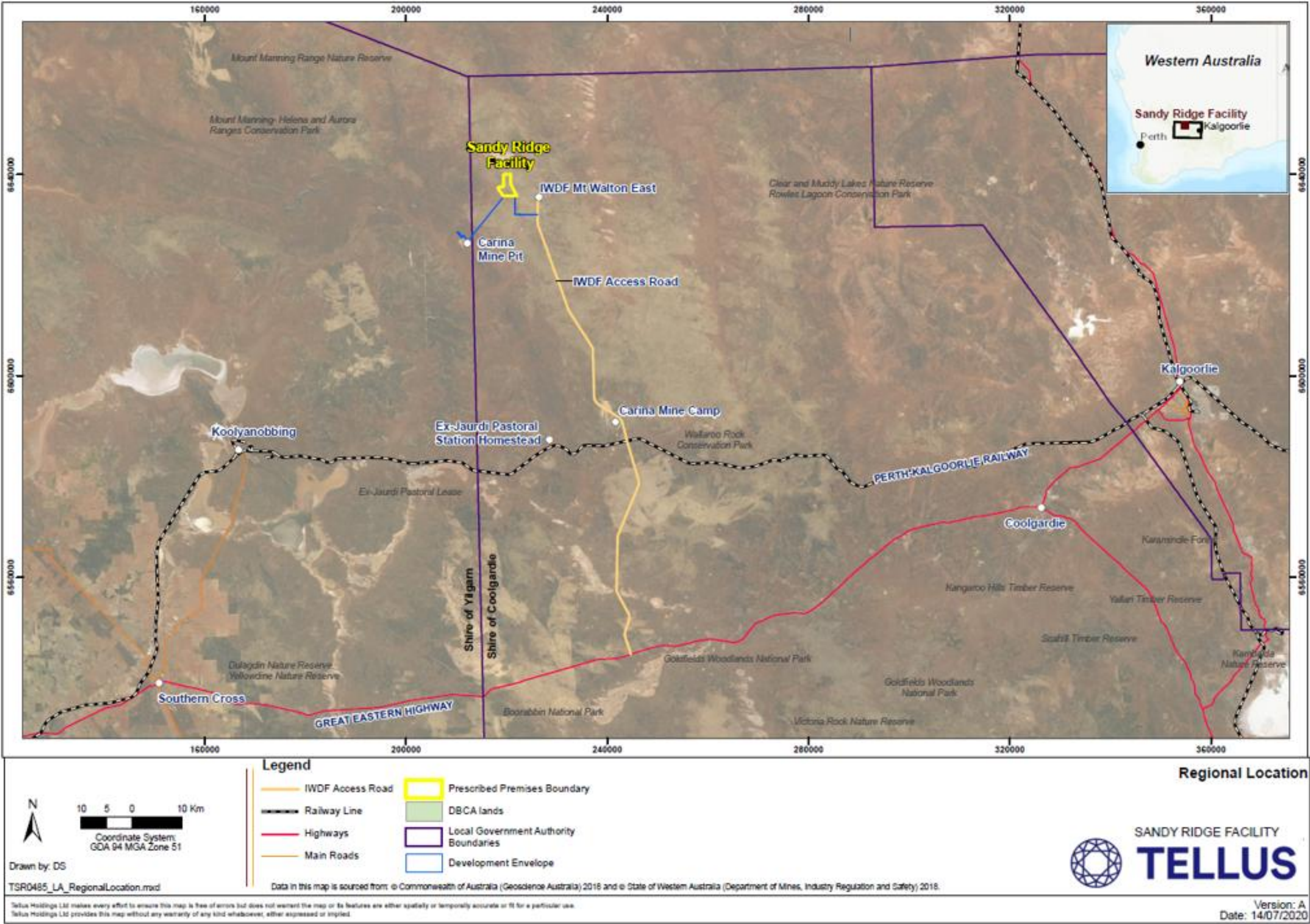
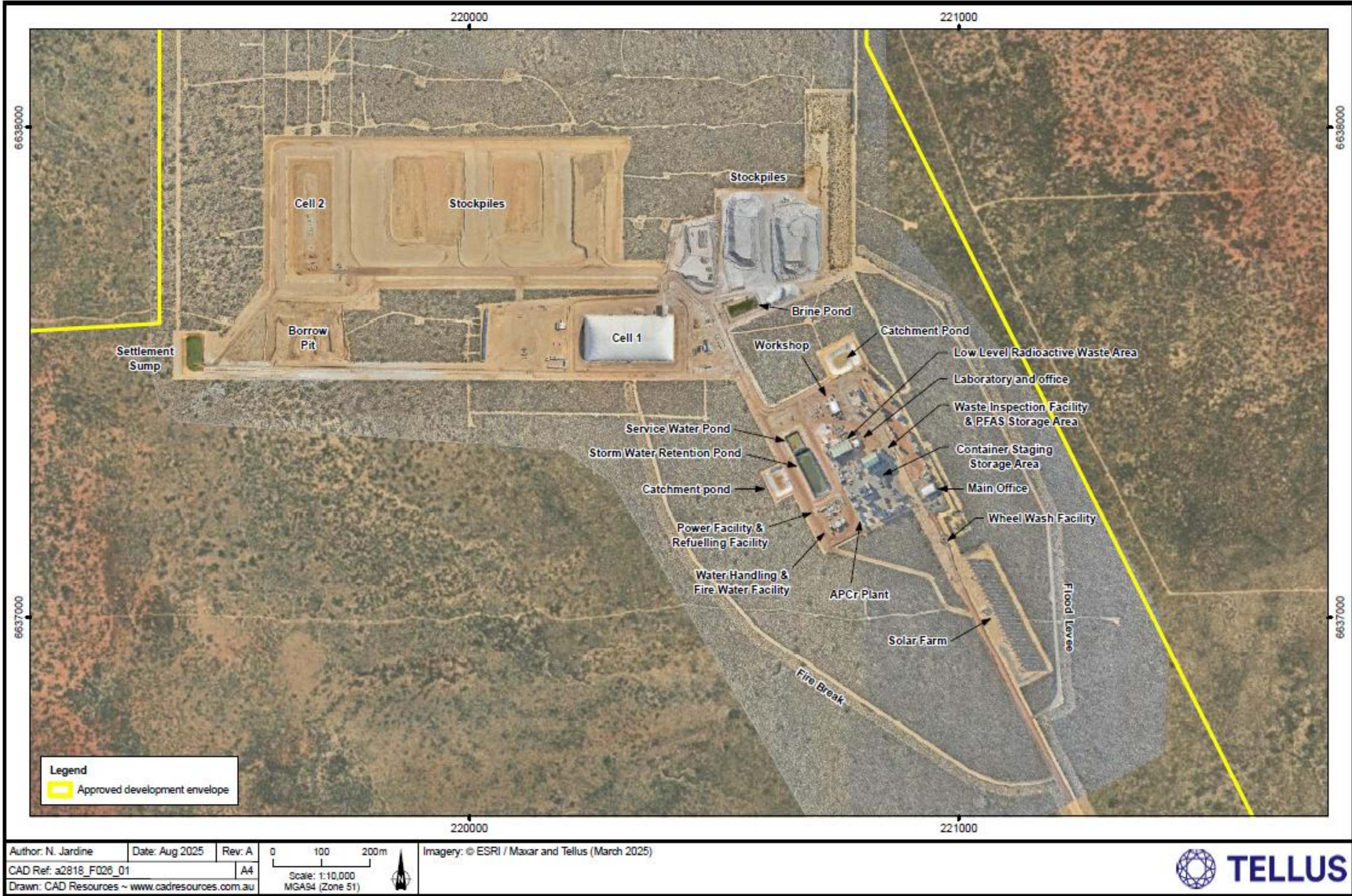


Figure 1-2 Sandy Ridge Facility Site Plan.



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

Construction of the Sandy Ridge Facility was completed on 9 October 2020. The facility first accepted waste on 6 July 2020.

During the reporting period, the Cell 2 air dome was raised in January 2026. Mining then commenced beneath the dome to form the future waste cell. Cell 2 construction is expected to be completed in October 2026.

Infrastructure at Sandy Ridge is shown in Figure 1-2 and includes:

- **Mine infrastructure:** stockpile area, storage building, administration offices, laydown yard, four stormwater storage tanks, brine pond and settlement pond.
- **Waste infrastructure:** Cell 1 and its air dome; Cell 2 construction site; temporary waste storage and inspection areas; stormwater drainage and retention infrastructure; Waste Immobilisation Plant, Homogenising Tank, Waste Neutralisation Plant and APCr conditioning facility; laboratory, workshop, flammable goods store and radiation scanner.

2.3 Key Characteristics

Condition 1 of EPBC approval 2015/7478 requires Tellus to comply with conditions 1 and 9 of the WA approval, to the extent those conditions apply to the approved action. The EPBC approval defines the WA approval as the relevant Ministerial Statement “as amended and in force from time to time”. MS 1078 has since been superseded by MS 1234. Table 2-2 therefore summarises compliance with the corresponding key characteristics under condition A1-1 of MS 1234.

Compliance with the annual MS 1234 proposal limits has been assessed using figures for 1 July 2025 to 30 June 2026, consistent with Tellus’s MS 1234 Compliance Assessment Report (CAR). The EPBC reporting period is 6 July 2025 to 5 July 2026; activities during the additional five days in July 2026 have also been considered. MS 1234 CARs are published on Tellus’s [Regulatory Info & Policies page](#).

Table 2-2 – Compliance with condition A1-1 of MS 1234

Requirement: The proponent must ensure that the proposal is implemented such that the limitations and maximum extents specified under condition A1-1 of MS 1234 are not exceeded.			
Key Characteristic	Description	Status	Further Information
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 2026, 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 2026, a total of 71.43 hectares of native vegetation within the development envelope had been cleared for associated infrastructure.
Class IV & V waste accepted at gate	up to 280,000 tonnes per annum	Compliant	During the WA approval reporting period (FY26), the following wastes were received: - 32,035.29 tonnes of chemical waste; - 392.04 tonnes of unsealed radioactive waste; - 743 sealed radioactive sources (negligible weight)
Temporary waste storage on surface	up to 15,000 tonnes	Compliant	The quantity of waste temporarily stored on the surface is calculated monthly using recorded waste receipts and disposal records. The 15,000-tonne temporary surface storage limit was not exceeded during the reporting period (maximum = 6036 t, average = 4943 t)
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	During the WA approval reporting period (FY26), the following wastes were permanently disposed: - 41,379.45 tonnes of chemical waste - 379.0 tonnes of radiological waste
Water use	up to 0.18 gigalitres (180,000m ³) per annum	Compliant	A total of 0.048 gigalitres (48,223 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 12-month temporary storage limit was exceeded during the reporting period. At the end of the reporting period, wastes exceeding the limit, excluding wastes covered by exemptions at that date, comprised 349 tonnes of PFAS-contaminated liquid, 87 tonnes of mercury-contaminated liquid, 10 tonnes of ammonia solution and five consignments of unsealed radiological waste. Approximately 1,700 tonnes of acidic liquid waste also exceeded the limit from 1 to 5 July 2026, following expiry of the CEO-approved temporary storage exemption on 30 June 2026. DWER is currently assessing Tellus's request to extend the exemption while commissioning of the Waste Neutralisation Plant continues. Corrective actions include prioritising older waste for processing, weekly review of packages approaching the storage limit, commissioning the Waste Neutralisation Plant, and developing an integrated waste management database to improve tracking of package storage durations. Since the end of the reporting period, the PFAS-contaminated liquid, ammonia solution and unsealed radiological waste exceedances have been resolved. Tellus expects to achieve full compliance with the temporary storage requirements of condition A1 during the 2026–27 reporting period.

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 – Approved management plans applicable during the reporting period

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)	07 May 2020	14 May 2020

The May 2020 DGMMP was approved under condition 2 of EPBC 2015/7478 and remained the approved version throughout the reporting period. A revision submitted in November 2022 received departmental comments but was not approved. The DGMMP is currently being updated to align with the LMMP approved in August 2026 and is expected to be submitted to DCCEEW for approval during the 2026–27 reporting period.

The original LMMP (Tellus, 2020) 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 MS1234 (December 2024) that the LMMP must be updated. This was updated on 07 July 2026 (v2) and was approved by DWER on 10 August 2026. Both dates fall after the EPBC reporting period ended on 5 July 2026.

During the reporting period, two Groundwater Monitoring Events (GME) occurred and identified the following:

- Minor PFAS trigger exceedances at SRMB151 and SRMB167 are attributed to historical sampling related contamination, rather than site activities. Overall PFAS concentrations have continued to decline.
- No complete source-pathway-receptor linkages were identified, and hydrogeological assessment indicates no risk of groundwater contamination arising from waste disposal operations.

Overall, the results of GME 10 and GME 11 confirm that groundwater conditions at the Sandy Ridge Facility remain stable, with no significant risk of contamination associated with site activities.

Implementation of the management plans is discussed further 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.

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5 REFERENCES

5.1 Supporting, verifying information, documentation

<u>[01] Tellus, 2026a. Compliance Assessment Report No. 8 2025-2026 Ministerial Statement 1234.</u>	Report
<u>[02] Tellus, 2020a. Leachate Monitoring and Management Plan, Version E, 7 May 2020, Ref: HS00-1760150200-49173.</u>	Management Plan
<u>[03] Tellus, 2026b. Leachate Monitoring and Management Plan, SR-11-MPL-007 Rev 3 July 2026.</u>	Management Plan
<u>[04] Tellus, 2020b, Deep Groundwater Monitoring and Management Plan, V1, SR-11-MPL-001. 1 May 2020.</u>	Management Plan
<u>[05] DAWE, Approval Letter, 2020, EPBC 2015/7478: Sandy Ridge Project – Deep Groundwater Monitoring and Management Plan, 29 May 2020.</u>	Letter
<u>[06] Tellus, 2022, Deep Groundwater Monitoring and Management Plan, V1, SR-11-MPL-003. 22 November 2022.</u>	Management Plan
<u>[07] EMM, 2021. Groundwater Quality Trigger and Threshold Criteria – Sandy Ridge Facility. Report # P200582 RP1 March 2021</u>	Report
<u>[08] Landloch, 2020. Sandy Ridge Project: Baseline soil audit for the facility, Mt. Walton access road and Sandy Ridge Access Rd. October 2020</u>	Report
<u>[09] DWER Environmental Licence L9240/2020/1 (www.dwer.gov.au)</u>	Licence
<u>[10] DWER Works Approval W6243/2019/1 (www.dwer.gov.au).</u>	Approval
<u>[11] DWER, Works Approval W6308/2019/1 (www.dwer.gov.au).</u>	Approval
<u>[12] Tellus 2021. Surface Water Control Operational Procedure SR-08.511, February 2021</u>	Procedure
<u>[13] Tellus, Email, Tellus to DAWE, 2019, EPBC 2015/7478 Sandy Ridge Facility - commencement notification, 18 July 2019 @12:27pm.</u>	Email
<u>[14] DAWE, Email, DAWE to Tellus, 2019, EPBC 2015/7478 Sandy Ridge Facility - commencement notification, 18 July 2019 @2:31pm.</u>	Email
<u>[15] Letter, DAWE, 2019, Commencement of the Action – Sandy Ridge Project, WA (EPBC 2015/7478), Ref: 2015/7478, 20 August 2019.</u>	Letter
<u>[16] Tellus, 2025b. Sandy Ridge – Biannual Groundwater Monitoring Event 10, October 2025. Summary Letter Report, February 2026.</u>	Report
<u>[17] Tellus, 2025c. Sandy Ridge – Biannual Groundwater Monitoring Event 11, April 2026. Summary Letter Report, May 2026.</u>	Report
<u>[18] Tellus, 2026 Sandy Ridge Soil Monitoring Report – February 2026.</u>	Report
<u>[19] Tellus, 2016 Waste Acceptance Procedure TCO-6-SR-01400-GE-PRO-0001 August 2016</u>	Procedure
<u>[2120] KASA Consulting. 2025/26 Annual Independent Waste Audit Report.</u>	Report
<u>[21] 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.</u>	Letter

5.2 External references

- A Commonwealth of Australia. 2014. Annual Compliance Report Guidelines.
- B Commonwealth of Australia 2026 PFAS NEMP Version 3.1 – May 2026.

APPENDIX A - EPBC 2015/7478 AUDIT TABLE

- **This Audit Table is a summary of the requirements applying to this Proposal.** Refer to the Approval issued for the proposal under Part 9 of the EPBC Act for details/precise wording of audit elements.

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence ¹	Comments
Part A – Conditions Specific to the Action				
A.1	To manage the impacts of the action on the environment , the approval holder must comply with conditions 1 and 9 attached to the WA approval to the extent those conditions apply to the taking of the action specified in this approval.	Non-compliant	[01] Tellus, 2025a. Compliance Assessment Report No. 8 2025-2026 Ministerial Statement 1234. [02] Tellus, Leachate Monitoring and Management Plan, Version E², 7 May 2020. [16] Tellus, 2026b. Sandy Ridge – Biannual Groundwater Monitoring Event 10: Summary Report, February 2026. [17] Tellus, 2026c. Sandy Ridge – Biannual Groundwater Monitoring Event 11: Summary Report, May 2026. [18] Tellus, 2026a Sandy Ridge Soil Monitoring Report 2026	Detailed findings regarding compliance with Conditions 1 and 9 of MS 1234 for the 2025-2026 reporting period are provided in the 2025-2026 CAR [01]. It is noted that MS 1078 has been superseded by MS 1234 and the equivalent to Conditions 1 and 9 of MS 1078 are now conditions A1 and B1 of MS 1234. <u>Condition A1 of MS 1234 – Non-compliant</u> The extent of the proposal, as defined in Table 2 of Schedule 1, was exceeded for various liquid and radiological wastes regarding the maximum temporary storage limit of 12 months during the reporting period. Tellus is engaged in ongoing consultation with regulators regarding this issue and as of August 2026 significant progress had been made in reducing the backlog. It is noted that Tellus pre-emptively notified DCCEEW of all waste packages (chemical and radiological) expected to exceed the 12-month temporary storage limit during the 2025-2026 reporting period. With the commissioning of the acid neutralisation plant and commencement of Cell 2 the non-compliance regarding storage of wastes for greater than 12 months is expected to be fully resolved this year. <u>Condition B1 of MS 1234 – Compliant</u> Requirements associated with Condition B1 – Terrestrial Environmental Quality are considered to have been met based on demonstrated compliance with the objectives defined in the Leachate Monitoring and Management Plan (LMMP) [03], approved by DWER in May 2020. • Biannual sampling (Groundwater Monitoring Events (GME)) against the parameters defined in Appendix H1 and H2 of the LMMP were undertaken in October 2025 (GME 10) and April 2026 (GME 11). Results from GME 10 [16] and GME 11 [17], indicate that requirements outlined in the LMMP and the DGMMP had been implemented and identified no detected impacts from waste disposal activities and there were no threshold level exceedances requiring external reporting. Minor PFAS trigger exceedances were detected in one bore in GME 10 (SRMB167) and two bores in GME 11 (SRMB151 and SRMB167); however, these are attributed to historical sampling related contamination, rather than site activities. Overall PFAS concentrations have continued to decline. No complete source-pathway-receptor linkages were identified, and hydrogeological assessment indicates no risk of groundwater contamination arising from waste disposal operations. • Tellus is required to conduct a soil quality audit every three years. A soil survey was conducted in January 2026 (Tellus, 2026a [18]), to assess metals, PFAS and radionuclides in surface soils in accordance with the Soil Monitoring Procedure. The report concluded that soil quality remained similar to pre-operational baseline conditions. Maximum concentrations detected of several metals and PFAS in 2026 were marginally higher than those recorded during previous monitoring events; but all results remained well below trigger levels. Gross alpha and gross beta activity measured at the Radiation Yard was comparable to previous results and to control locations, and did not exceed investigation trigger levels, indicating no measurable radiological impact to soils.

¹ Refer to Section 5.1 Supporting, verifying information, documentation.

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence ¹	Comments
A.2.1	To enable the early detection of any leachate and to protect the environment from impacts from leachate to deep groundwater, the approval holder must submit a deep groundwater monitoring and management plan. The deep groundwater monitoring and management plan must commit the approval holder to undertake monitoring and management of potential impacts to the groundwater within the weathered granite and granite hard rock (bedrock) as specified below. The approval holder must not commence waste receipt unless the Minister has approved the deep groundwater monitoring and management plan in writing. If the Minister approves the deep groundwater monitoring and management plan then the approved deep groundwater monitoring and management plan must be implemented.	Compliant	[02], [16], [17] [04] Tellus, 2020, Deep Groundwater Monitoring and Management Plan, V0, 15 May 2020. [05] DAWE, Approval Letter, 2020, EPBC 2015/7478: Sandy Ridge Project – Deep Groundwater Monitoring and Management Plan, 29 May 2020. [06] Tellus, 2020, Deep Groundwater Monitoring and Management Plan, V1, SR-11-MPL-003. 22 November 2022.	Tellus originally submitted a Deep Groundwater Monitoring and Management Plan (DGMMP), dated 15 May 2020 [04] to the Minister on 15 May 2020. DAWE issued a letter to Tellus dated 29 May 2020 [05] that approved the DGMMP [dated 15 May 2020 (Rev0)] in accordance with Condition 2(1) of Part A of EPBC 2015/7478. An updated version of the DGMMP [06] was sent to EPBC Monitoring at DAWE (now DCCEEW) on 22 November 2022 and an email response was received from DCCEEW (22/02/2023) acknowledging they had received a copy of the revised DGMMP. Implementation The following monitoring requirements for the deep groundwater bore (SRMB167) were included in the DGMMP (Table 2-1). - Twelve sampling events were undertaken to determine a baseline to establish trigger and threshold criteria. - Biannual sampling against the parameters defined in the LMMP had been undertaken (GME 10 [16] (October 2025) and GME 11 [17] (April 2026)). <u>Ongoing monitoring</u> Summary reports for GME 10 and 11 identified the following: - Minor PFAS trigger exceedances at SRMB151 and SRMB167 are attributed to historical sampling related contamination, rather than site activities. Overall PFAS concentrations have continued to decline. - No complete source-pathway-receptor linkages were identified, and hydrogeological assessment indicates no risk of groundwater contamination arising from waste disposal operations. Updated trigger levels have been proposed in a revised LMMP, which has been submitted to DWER.
A.2.2	The deep groundwater monitoring and management plan must specify:	-	-	-
A.2.2 a	a) monitoring procedures and protocols, including monitoring location points and frequency of monitoring (minimum every six (6) months);	Compliant	[06]	Section 5 (Monitoring) of the DGMMP [06] provided an overview of the deep groundwater bore monitoring program, including monitoring points and frequencies.
A.2.2 b	b) mitigation and management measures;	Compliant	[06]	Section 4 of the DGMMP [6] details mitigation and management measures.
A.2.2 c	c) an adaptive management framework, including early warning triggers, trigger criteria, monitoring design and methodologies, and trigger management actions;	Compliant	[06]	Section 6 of the DGMMP [06] details the adaptive management framework.
A.2.2 d	d) incident reporting;	Compliant	[06]	Incident reporting was addressed in Section 7.1 [06] of the DGMMP which noted that any incidents would be managed in accordance with the requirements of its certified management system. The Sandy Ridge Facility has implemented the MYOSH system for recording and managing all incidents.
A.2.2 e	e) review periods; and	Compliant	[06]	Review periods were specified in Section 7.3 [06] of the DGMMP.
A.2.2 f	f) implementation reporting and auditing by a suitably qualified person .	Compliant	[06]	Reporting and auditing of the DGMMP by a suitably qualified person is addressed in Section 7.4 of the DGMMP [06]. It is proposed that the audits are undertaken every three years. The last independent audit was completed in November 2023.
A.2.3	To be capable of detecting any potential contamination of groundwater, the deep groundwater monitoring and management plan must include parameters collected during at least 12 months of baseline monitoring of groundwater and soil quality undertaken prior to commencing waste receipt .	Compliant	[07] EMM, 2021. Groundwater Quality Trigger and Threshold Criteria – Sandy Ridge Facility. Report # P200582 RP1 March 2021. [08] Landloch, 2020. Sandy Ridge Project: Baseline soil audit for the facility, Mt. Walton access road and Sandy Ridge Access Rd. October 2020. [18] Tellus, 2026 Sandy Ridge Soil Monitoring Report – February 2026.	Twelve deep groundwater baseline sampling events were undertaken to establish trigger and threshold criteria. The Groundwater Quality Trigger and Threshold Criteria report (EMM, 2021 [07], based on this sampling was issued in March 2021, prior to in-ground disposal commencing. Groundwater monitoring events (GME) are conducted every 6 months to assess whether there are any detectable environmental impacts resulting from operations. A baseline soil audit was undertaken by Landloch [08] in two campaigns (April 2019 and January 2020). The audit summary stated “Surface soils of the Sandy Ridge Project have been audited for a range of testing suites, including Inorganics, Heavy Metals, Asbestos, PCBs, PFAS, and Radionuclides. The audit results indicate that no significant environmental concerns currently exist for the soils that have been sampled.” Tellus is required to conduct a targeted soil quality audit every three years in accordance with Sandy Ridge’s Leachate Monitoring and Management Plan (LMMP). A soil survey was conducted in January 2026 (Sandy Ridge Soil Monitoring Report – 2026) [18], which concluded that soil quality remained similar to pre-operational baseline conditions. Maximum concentrations detected of several metals and PFAS in 2026 were marginally higher than those recorded during previous monitoring events; however, all results remained well below trigger levels.

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence ¹	Comments
A.3	To exclude potential floodwaters from the site and to prevent the release of potentially contaminated floodwaters to the environment, the approval holder must ensure that any surface water that enters or leaves the action area cannot spread contaminants out of the action area. To meet this objective the approval holder must ensure that monitoring of the action's impacts is capable of detecting any contaminants before they can be transported out of the action area.	Compliant	[03] [09] DWER Environmental Licence L9240/2020/1 (www.dwer.gov.au). [10] DWER Works Approval W6243/2019/1 (www.dwer.gov.au). [11] DWER Works Approval W6308/2019/1 (www.dwer.gov.au). [12] Tellus 2021. Surface Water Control Operational Procedure SR-08.511, February 2021	Physical Infrastructure To exclude potential floodwaters from the site and to prevent the release of potentially contaminated floodwaters to the environment a flood levee measuring approximately 1 km by 11 m in width was constructed to the east of the infrastructure area. Figure 2 (p.6) of Works Approval W6243/2019/1 [10] issued on 20 April 2019 by DWER specified the civil earthworks design for drainage of the infrastructure area and Column 2, Table 2 (pp.9-17) of Works Approval W6308/2019/1 [11] issued on 7 February 2020 and amended 27 March 2020 by DWER included the design and construction requirements for the specific areas of the facility including, but not limited to the waste storage – east yard, PFAS contaminated waste storage area and the low-level radiation waste liquid waste and sludge storage yard. External areas are designed to drain towards blind sumps or two stormwater retention ponds. Covered waste storage areas are designed to drain to internal blind concrete sumps which will be pumped out into 1,000 L Intermediate Bulk Containers (IBCs) if full. Four stormwater tanks each with a capacity of 50,000 litres have also been installed that are capable of holding stormwater from the Low Level Radiation waste, Liquid Waste and Sludge Storage Yard and Liquid Waste Unloading Area. The issuing of the DWER Environmental Licence L9240/2020/1 [09] indicated that DWER were satisfied that construction of the facility was in accordance with the Works Approvals. An audit of the Environmental Licence conducted in July 2026 confirmed regular inspections were being undertaken and recorded in the MYOSH database. The audit also confirmed drainage and water storage infrastructure was in good condition and well maintained. It is noted that during an inspection of the facility by DWER in May 2026 a non-compliance was raised with respect to a drainage channel in the east yard being filled with sediment; however, this issue was rectified and at the time of the internal compliance audit the drainage was well maintained. Monitoring Groundwater monitoring was undertaken in accordance with the approved Leachate Monitoring and Management Plan (LMMP) [03] Monitoring of stormwater ponds and sumps is undertaken to ensure their integrity is maintained (scheduled inspections in MYOSH system). A summary of surface water catchments and storages, including maintenance requirements is defined in the Surface Water Control procedure (SR-08.511) [11].
A.4	To ensure a nationally consistent approach to the environmental regulation of PFAS, the approval holder must implement the PFAS National Environmental Management Plan (NEMP) .	Compliant	[B] Commonwealth of Australia 2020 PFAS National Environmental Management Plan Version 2.0 – January 2020 [19] Tellus, 2016 Waste Acceptance Procedure TCO-6-SR-01400-GE-PRO-0001 August 2016	During the reporting period PFAS contaminated wastes were received from several sources. A detailed audit against the PFAS NEMP was not undertaken as part of this report, however, a review against its key applicable requirements concluded that Tellus had broadly established and implemented a waste management system at Sandy Ridge that complied with the objectives of NEMP. Key findings include: the Sandy Ridge Waste Management System evaluates the acceptability of waste coming to site following an approved Waste Acceptance procedure (WAP) [19], which requires the waste to be characterised and assessed against numerous different criteria. This process is in alignment with the PFAS NEMP. The WAP checklist also asks the question as to whether future recovery and recycling of the waste is intended. It is also acknowledged in the PFAS NEMP that the range of treatment facilities and technology options commercially available to remove and/or destroy PFAS compounds is limited, and that on-site encapsulation is a preferred option. It was noted that the PFAS NEMP [B] (section 11.1) specifies ‘<i>PFAS-contaminated materials, including waste PFAS-containing products, are considered to be Dangerous Goods Class 9.</i>’; however, Section 11.2 specifies ‘<i>PFAS-contaminated materials must be transported in accordance with the requirements of the environmental regulator</i>’. Waste management records, Including Incoming Waste Vehicle Checklists indicate all PFAS containing wastes have been classified as non-DG. Interviewed Tellus personnel stated that they believed they were compliant because in WA the NEMP contradicts WA legislation, which references the ADG Code. The ADG Code (section 3.3.3 Australian Special Provisions, # AU01) specifies ‘Environmentally Hazardous Substances meeting descriptions of UN3077 or UN3082 are not subject to this Code when transported by road or rail in: a) Packaging’s that do not incorporate a receptacle exceeding 500kg (L); or b) IBCs.
A.5	The approval holder must ensure waste emplacement is undertaken as described in the action description of this approval notice. The approval holder must not emplace waste by borehole disposal (commonly referred to as the BOSS method).	Compliant	[20] KASA Consulting. 2025/26 Annual Independent Waste Audit Report.	All permanently disposed of waste was placed within the engineered waste cell, which is confirmed annually via an independent waste audit, as required under MS 1234. The 2026 audit was undertaken in July 2026 [20]. Emplacement of waste by borehole disposal (commonly referred to as the BOSS method) is not undertaken or planned for operational activities.

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence ¹	Comments
Part B – Standard Administrative Conditions				
B.6	Notification of the date of commencement of the action The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action .	Compliant	[13] Tellus, Email, Tellus to DAWE, 2019, EPBC 2015/7478 Sandy Ridge Facility - commencement notification, 18 July 2019 @12:27pm. [14] DAWE, Email, DAWE to Tellus, 2019, EPBC 2015/7478 Sandy Ridge Facility - commencement notification, 18 July 2019 @2:31pm. [15] Letter, DAWE, 2019, Commencement of the Action – Sandy Ridge Project, WA (EPBC 2015/7478), Ref: 2015/7478, 20 August 2019.	On 18 July 2019 Tellus notified by email the Department’s Post Approvals Section that commencement of the action occurred on 7 July 2019 [13]. The Department acknowledged the notification in a return email, also dated 18 July 2019 [14]. The Department formally responded to the notification of commencement of the action in a letter dated 20 August 2019 [15].
B.7	Compliance records The approval holder must maintain accurate and complete compliance records .	Compliant	Online Health, Safety & Environmental software (MYOSH).	Tellus has implemented an online health, safety and environment online management software program, MYOSH, to facilitate the management of environmental obligations. The system allows for compliance records and tasks to be assigned to specific obligation conditions as well as environmental monitoring data to be managed, including, but not limited to real-time data and chains of custody. Waste management records are maintained using Tellus’s online waste management system.
B.8	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.	Not Applicable	-	There have been no requests from the Department concerning electronic copies of compliance records, therefore this requirement was not triggered within the reporting period.
B.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:	Compliant	-	Reports have been prepared for each annual period since the project commenced.
B.9.a	a) publish each compliance report on the website within 60 business days following the relevant 12-month period;	Compliant	Sandy Ridge Facility Regulatory Information page, Tellus website (www.tellusholdings.com).	All previous ACRs are available on the Sandy Ridge Facility Regulatory Information page of the Tellus website. The ACR for the reporting period 2025 – 2026 will be published to the Sandy Ridge Facility Regulatory Information page of the Tellus website within 60 business days following the relevant 12-month period. The reporting period ended on 6 July 2026; therefore, this ACR will be published by 28 September 2026.
B.9.b	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;	Compliant	Sandy Ridge Facility Regulatory Information page, Tellus website (www.tellusholdings.com).	All previous ACRs written for EPBC 2015/7478 were published to the Sandy Ridge Facility Regulatory Information page of the Tellus website. Email notifications to the department were sighted. The Department will be notified by email when this ACR has been published on the website (within five business days of the date of publication).
B.9.c	c) keep all compliance reports publicly available on the website until this approval expires;	Compliant	Sandy Ridge Facility Regulatory Information page, Tellus website (www.tellusholdings.com).	All previous ACRs have been published to the Sandy Ridge Facility Regulatory Information page of the Tellus website. ACRs will be publicly available on the Sandy Ridge Facility section of the Tellus website until EPBC 2015/7478 expires.
B.9.d	d) exclude or redact sensitive ecological data from compliance reports published on the website ; and	Not Applicable		The published Sandy Ridge Facility ACRs do not include any sensitive data ecological data that requires redacting.
B.9.e	e) where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.	Not Applicable		The published Sandy Ridge Facility ACRs did not include any sensitive ecological data that requires redacting.

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence ¹	Comments
B.10	Reporting non-compliance The approval holder must notify the Department in writing of any: incident ; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify: a) the condition which is or may be in breach; and b) a short description of the incident and/or non-compliance.	Compliant	[21] Tellus letter to DCCEEW dated 30 June 2025.	Tellus sent a letter to Karina Richards, Assistant Director Approvals Compliance Section, Compliance and Enforcement Branch, DCCEEW for the 2025-26 reporting period titled: Notification of Anticipated Exceedance of the 12-Month Temporary Storage Limit – EPBC 2015/7478 Condition A1. 30 June 2025 [21]. This letter pre-emptively informed DCCEEW of all non-compliances regarding exceedance of the 12 month temporary storage limit for the 2025-26 reporting period.
B.11	The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying: a) any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; b) the potential impacts of the incident or non-compliance; and c) the method and timing of any remedial action that will be undertaken by the approval holder.	Compliant	[21]	The above letter included proposed corrective actions and stated that there had been no environmental impacts.
B.12	Independent audit The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister .	Not Applicable	-	There has been no request from the Minister concerning an independent audit, therefore this requirement was not triggered within the reporting period. An independent annual waste audit is a requirement of the State Approval (MS 1234). This audit also assesses compliance with EPBC2015-7478 to inform this ACR and was last conducted in July 2026.
B.13	For each independent audit , the approval holder must: a) provide the name and qualifications of the independent auditor and the draft audit criteria to the Department ; b) only commence the independent audit once the audit criteria have been approved in writing by the Department ; and c) submit an audit report to the Department within the timeframe specified in the approved audit criteria.	Not Applicable	-	Not Applicable (not triggered).
B.14	The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	Not Applicable	-	Not Applicable (not triggered).
B.15	Completion of the action Within 30 days after the completion of the action , the approval holder must notify the Department in writing and provide completion data .	Not Applicable	-	Not Applicable (not triggered).