Government of Western Australia
Department of Water and Environmental Regulation

Amendment Notice 1

Licence Number	L4680/1988/13
Licence Holder	FMR Investments Pty Ltd
ACN	009 411 349
File Number:	2012/003899
Premises	Greenfields Processing Site Part Mining Tenement M15/154 and Lot 102 on Plan 40393 Great Eastern Highway COOLGARDIE WA 6429
Date of Amendment	8 December 2017

Amendment

The Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (DWER) has amended the above Licence in accordance with section 59 of the *Environmental Protection Act 1986* (EP Act) as set out in this Amendment Notice. This Amendment Notice constitutes written notice of the amendment in accordance with section 59B(9) of the EP Act.

Date signed: 8 December 2017

Tim Gentle

Manager Licensing – Resource Industries

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

Definitions and interpretation

Definitions

In this Amendment Notice, the terms in Table 1 have the meanings defined.

Table 1: Definitions

Term	Definition
AACR	Annual Audit Compliance Report
ACN	Australian Company Number
AER	Annual Environment Report
Amendment Notice	refers to this document
Annual Audit Compliance Report	Means a report in a format approved by the CEO as presented by the Licence Holder or as specified by the CEO (guidelines and templates may be available on the Department's website)
Category/ Categories/ Cat.	categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
CEO	means Chief Executive Officer. CEO for the purposes of notification means: Director General Department Administering the *Environmental Protection Act 1986* Locked Bag 33 Cloisters Square PERTH WA 6850 info-der@dwer.wa.gov.au
CS Act	*Contaminated Sites Act 2003* (WA)
Delegated Officer	an officer under section 20 of the EP Act
Department	means the department established under section 35 of the *Public Sector Management Act 1994* and designated as responsible for the administration of Part V, Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation
EPA	Environmental Protection Authority
EP Act	*Environmental Protection Act 1986* (WA)

EP Regulations	*Environmental Protection Regulations 1987* (WA)
Licence Holder	FMR Investments Pty Ltd
Licensee	has the same meaning as Licence Holder
m^3	cubic metres
mbgl	metre(s) below ground level
mtpa	million tonnes per annum
NEPM	National Environmental Protection Measure
Occupier	has the same meaning given to that term under the EP Act.
Prescribed Premises	has the same meaning given to that term under the EP Act.
Premises	refers to the premises to which this Decision Report applies, as specified at the front of this Decision Report.
Risk Event	as described in *Guidance Statement: Risk Assessments*
RL	refers to the term 'Relative Level' and is the height or elevation above the point adopted as the site datum for the purpose of establishing levels.
TDS	Total dissolved solids
TSF	Tailings Storage Facility
VWP	Vibrating Wire Piezometer
WAD CN	Weak acid dissociable cyanide

Amendment Notice

This amendment is made pursuant to section 59 of the *Environmental Protection Act 1986* (EP Act) to amend the Licence issued under the EP Act for a prescribed premises as set out below. This notice of amendment is given under section 59B(9) of the EP Act.

This notice is limited only to an amendment authorising construction of the stage 2 embankment raises to TSF 3 Cell A and TSF 3 cells B and C. No changes to the throughput threshold of the Licence relating to Category 5 have been requested by the Licence Holder.

The following guidance statements have informed the decision made on this amendment*:*

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Decision Making (February 2017)*
- *Guidance Statement: Risk Assessments (February 2017)*
- *Guidance Statement: Environmental Siting (November 2016)*

Amendment description

FMR Investments Pty Ltd operate a toll gold ore processing mill and associated Tailings Storage Facility. The Tailings Storage Facility is an above ground facility, comprising two decommissioned cells (TSF1 and TSF2) and three cells A, B and C collectively comprising TSF3, surrounding TSF1 and TSF2 to the south and east (refer to Figure 3 of this Amendment Notice for their approximate location).

FMR Investments have submitted an application for an upstream embankment raise of up to 2.5m height for TSF3 Cell A, to a total perimeter embankment crest height of RL 399.6m. The application is also for an embankment raise for TSF3 Cells B and C by up to 2.5m height to a total embankment crest height of RL 392.6m. The decant structure within each Cell will be raised (Cell A decant to RL 399.7m, Cell B and C to RL 392.6m) and located from the internal (northern) embankment. The proposed embankment raise is known as Stage 2. Refer to Table 2 below.

Table 2: Current and proposed embankment heights for TSF3, Cell A, B and C

TSF3 Cell	Current crest level (stage 1)	Embankment raise	Proposed Stage 2 crest level	Lowest ground level	Maximum embankment height
Cell A	RL 397.1m	0 to 2.5m	RL 399.6m	RL 390.6m	1m (south west) – 9m (south east)
Cell B	RL 390.1m	2.5m	RL 392.6m	RL 388m	4.6m
Cell C	RL 390.1m/ 392.6m	0 to 2.5m	RL 392.6m	RL 390m	2.6m

In addition to the perimeter and internal embankment raises, and raising of the internal decant structure and causeway, eight vibrating wire piezometers will be installed within the perimeter embankment, in order to allow detection of a phreatic surface (wetting front from the tailings) within the embankment wall (refer to Figure 2 for proposed location for the piezometers). The information from monitoring of the piezometers will be utilised to confirm the stability of the TSF embankments.

Other approvals

TSF 3 is located on freehold land (Lot 102 on Plan 40393). As such, the *Mining Act 1978* does not apply and a Mining Proposal is not required to authorise construction, operation or closure of the TSF. The *Mines Safety and Inspection Act 1994* and related Regulations do apply however. DWER has requested advice from the Department of Mines, Industry Regulation and Safety (DMIRS) in regard to the geotechnical aspects of the proposed embankment raises.

Amendment history

Table 3 provides the amendment history for L4680/1988/13.

Table 3: Licence amendments

Instrument	Issued	Amendment
L4680/1988/13	DRAFT	Amendment Notice 1 – Authorise stage 2 embankment raises to TSF3 Cell A, B and C

Location and receptors

Table 4 below lists the relevant sensitive land uses in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 4: Receptors and distance from activity boundary

Residential and sensitive premises	Distance from Prescribed Premises
Coolgardie	4km south of Premises
Pastoral activities	The freehold land on which the TSF is situated is surrounded by pastoral leases and used for grazing

Table 5 below lists the relevant environmental receptors in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 5: Environmental receptors and distance from activity boundary

Environmental receptors	Distance from Prescribed Premises
Brown Lake (salt lake)	6km to the east

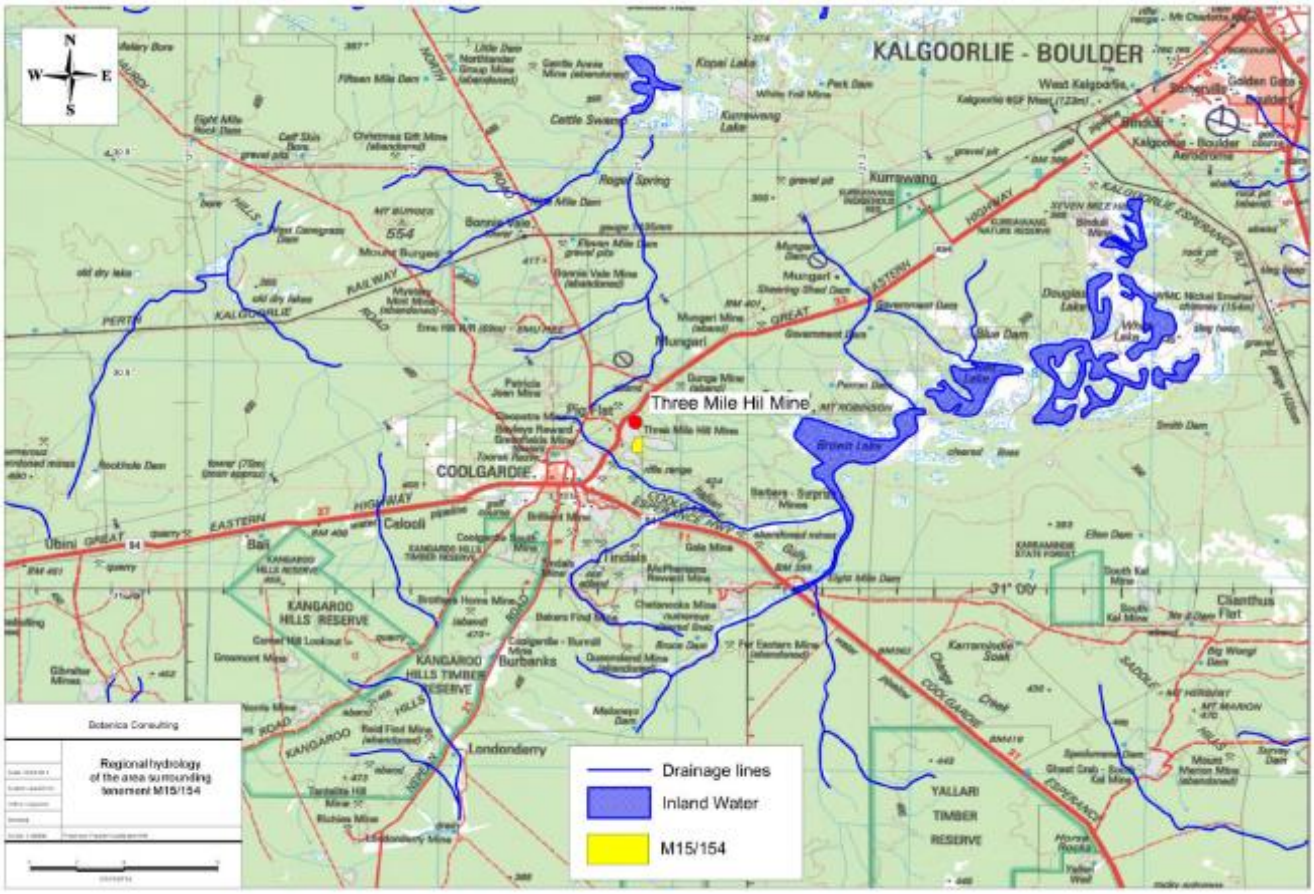

Figure 1: Regional map of surface hydrology surrounding Greenfield Processing Site (M15/154). Brown lake highlighted in blue (Botanica Consulting 2017)

Risk assessment

Tables 8 and 9 (following) describe the Risk Events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. The table identifies whether the emissions present a material risk to public health or the environment, requiring regulatory controls.

The risk rating for these risk events has been determined in accordance with the risk rating matrix set out in Table 6 below.

Table 6: Risk rating matrix

Likelihood	Consequence				
	Slight	Minor	Moderate	Major	Severe
Almost certain	Medium	High	High	Extreme	Extreme
Likely	Medium	Medium	High	High	Extreme
Possible	Low	Medium	Medium	High	Extreme
Unlikely	Low	Medium	Medium	Medium	High
Rare	Low	Low	Medium	Medium	High

The assessment of the consequence and likelihood of the Risk Event was made in accordance with the criteria in Table 7 below.

Table 7: Risk criteria table

Likelihood		**Consequence**		
The following criteria has been used to determine the likelihood of the Risk Event occurring.		**The following criteria has been used to determine the consequences of a Risk Event occurring:**		
			Environment	**Public health* and amenity (such as air and water quality, noise, and odour)**
Almost Certain	The risk event is expected to occur in most circumstances	Severe	• **onsite impacts**: catastrophic • **offsite impacts local scale**: high level or above • **offsite impacts wider scale:** mid-level or above • Mid to long-term or permanent impact to an area of high conservation value or special significance^ • Specific Consequence Criteria (for environment) are significantly exceeded	• Loss of life • **Adverse health effects:** high level or ongoing medical treatment • Specific Consequence Criteria (for public health) are significantly exceeded • **Local scale impacts:** permanent loss of amenity
Likely	The risk event will probably occur in most circumstances	Major	• **onsite impacts**: high level • **offsite impacts local scale**: mid-level • **offsite impacts wider scale**: low level • Short-term impact to an area of high conservation value or special significance^ • Specific Consequence Criteria (for environment) are exceeded	• **Adverse health effects:** mid-level or frequent medical treatment • Specific Consequence Criteria (for public health) are exceeded • **Local scale impacts**: high level impact to amenity
Possible	The risk event could occur at some time	Moderate	(i) **onsite impacts**: mid-level (ii) **offsite impacts local scale**: low level (iii) **offsite impacts wider scale**: minimal (iv) Specific Consequence Criteria (for environment) are at risk of not being met	(v) **Adverse health effects:** low level or occasional medical treatment (vi) Specific Consequence Criteria (for public health) are at risk of not being met (vii) **Local scale impacts:** mid-level impact to amenity
Unlikely	The risk event will probably not occur in most circumstances	Minor	(viii) **onsite impacts**: low level (ix) **offsite impacts local scale**: minimal (x) **offsite impacts wider scale**: not detectable (xi) Specific Consequence Criteria (for environment) likely to be met	(xii) Specific Consequence Criteria (for public health) are likely to be met (xiii) **Local scale impacts:** low level impact to amenity
Rare	The risk event may only occur in exceptional circumstances	Slight	• **onsite impact**: minimal • Specific Consequence Criteria (for environment) met	• **Local scale**: minimal to amenity (xiv) Specific Consequence Criteria (for public health) met

^ Determination of areas of high conservation value or special significance should be informed by the *Guidance Statement: Environmental Siting.*

* In applying public health criteria, DWER may have regard to the Department of Health's *Health Risk Assessment (Scoping) Guidelines.*

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Table 8: Risk assessment for proposed amendments during construction

Risk Event						Consequence rating	Likelihood rating	Risk	Reasoning
Source/Activities		**Potential emissions**	**Potential receptors**	**Potential pathway**	**Potential adverse impacts**				
Category 5 Processing or beneficiation of metallic or non-metallic ore	Construction of embankment raises	Dust: associated with construction activities	Town of Coolgardie; adjacent mining operations	Air	Health and amenity impacts	Slight	Possible	Low	Embankment raises will be constructed using consolidated tailings. Minimum moisture content will be required to be maintained via quality control process in order to ensure adequate compaction of construction materials (tailings) is achieved. The construction specifications for both Cell A and Cell B/C require the use of water carts to minimise dust (RedRock Geotechnical 2017). Adjacent receptors are primarily operating mines.

Table 9: Risk assessment for proposed amendments during operation

Risk Event						Consequence rating	Likelihood rating	Risk	Reasoning
Source/Activities		**Potential emissions**	**Potential receptors**	**Potential pathway**	**Potential adverse impacts**				
Category 5 Processing or beneficiation of metallic or non-metallic ore	Tailings deposition to TSF3 Cell A, Cell B and Cell C	Tailings seepage	Native vegetation (woodland of *E. torquata* and *E. lesouefii* over mixed chenopod scrubland)	Inundation of vegetation root zones with seepage	Adverse impacts to the health and survival of vegetation	Moderate	Unlikely	Medium	Groundwater is not a receptor due to its salinity. Native vegetation may be impacted by groundwater mounding in the vicinity of the TSF, however groundwater levels remain well below the licence limit 4mgbl (Botanica Consulting 2017). The TSF3 has a seepage underdrainage system installed with

									drainage directed to external toe drains which are graded to fall towards the return water dam located in the south east corner external to the TSF 3 (refer to Figure 3 for further detail of toe drain locations).
		Tailings liquor (decant/ supernatant)	Birds and other wildlife	Direct ingestion of WAD CN and metals (copper)	Fauna sickness or death	Moderate	Unlikely	Medium	Tailings supernatant liquor quality is hypersaline (~ 110 000mg/L) and has residual WAD CN concentrations of approximately 23mg/L (Botanica 2017). Providing the TDS is kept > 50 000 mg/L, wildlife will not drink the saline water (Adams, M.D., *et al* 2008). Additionally if the WAD CN concentration is kept below 50 mg/L, birds should not be impacted. However given the Premises provides toll treatment of third party ores, there exists the potential for variability in metal/metalloid concentrations of the tailings discharge and potential variability in WAD CN concentrations at discharge. It is recommended that the TDS in the tailings discharge be monitored daily to ensure that the salinity is held above 50 000 mg/L.

	Tailings delivery and return pipelines	Tailings and tailings supernatant (liquor)	Native vegetation	Tailings pipeline failure	Adverse impacts to the health and survival of vegetation	Minor	Unlikely	Medium	Route from the processing mill to the TSF is short and mostly located in cleared areas. Minimal risk of tailings spill impacting on vegetation. Existing condition 1.3.1 requires telemetry systems to be installed or automatic cut-outs or bunding. This condition will be amended to ensure bunding and one of the other monitoring/ response systems is installed.

Decision

The Amendment is granted. Licence Holder controls for the construction of the works are conditioned on the Licence to ensure that the embankment raises are constructed in accordance with the design reports and subsidiary information assessed by both DWER and DMIRS as new condition 1.3.6. Compliance reporting requirements for the TSF3 Stage 2 embankments raise is required by conditions 3.2.4 and 3.2.5.

Condition 2.3.1 currently on the Licence captures monitoring of impacts to groundwater from TSF seepage. Existing limits on standing water levels and weak acid dissociable cyanide concentration in groundwater will ensure that the potential impact on vegetation from seepage is managed. A modification is made to condition 2.3.1 to require daily monitoring of TDS concentrations within the active TSF cell's supernatant pond, to ensure the tailings remain unpalatable to birds and other wildlife.

Definitions and conditions 1.2.2 and 1.2.3 have been updated to reflect the current iteration of the Department, clarification on the definition of environmental hazardous materials and reference to the stormwater structures currently in use surrounding the TSF. Inspection of these stormwater structures is now required by Table 1.3.2.

Condition 1.3.2 has been revised to better reflect the current TSF containment infrastructure present at the Premises.

To reflect the regulatory nature of the TSF due to its location on freehold tenure, Table 1.3.2 has been amended to require inspections of the embankments' stability. Submission of a mine closure plan for the Premises to DWER is required by new condition 1.3.8 in order to ensure the progressive construction and operation of the TSF is conducted to facilitate closure. An additional reporting requirement is detailed in new condition 3.2.6, to ensure annual geotechnical and engineering inspections of the TSF are completed and submitted both to DWER and DMIRS.

Licence Holder's comments

The Licence Holder was provided with the draft Amendment Notice on 1 December 2017. Comments received from the Licence Holder have been considered by the Delegated Officer as shown in Appendix 2.

Amendment

1. Definitions of the Licence are amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:

'**Annual Audit Compliance Report'** means a report in a format approved by the CEO as presented by the Licence Holder or as specified by the CEO (guidelines and templates are available on the Department's website);

'**CEO**' means the Chief Executive Officer of the Department of Water and Environmental Regulation

'CEO' for the purpose of correspondence means;

Director General
Department Administering the Environmental Protection Act 1986
Locked Bag 33
CLOISTERS SQUARE WA 6850
~~Telephone: (08) 9333 7510~~
~~Facsimile: (08) 9333 7550~~
Email: ~~info@der.wa.gov.au~~ info-der@dwer.wa.gov.au

'**environmentally hazardous materials**' means any liquors or slurries (solid and liquids in solution) that are either alkaline, acidic, saline, toxic or have the potential to cause environmental harm if released to the environment.

2. Condition 1.2.2 of the Licence is amended by the insertion of the red text shown in underline below:

1.2.2 The Licensee shall immediately recover, or remove and dispose of spills of environmentally hazardous materials which occur outside an engineered containment system.

3. Condition 1.2.3 of the Licence is amended by the deletion of the text shown in strikethrough and the insertion of the red text shown in underline below:

1.2.3 The Licensee shall maintain the TSF stormwater diversion channels, located as shown in Figure 3 of this Amendment Notice 1.

~~(a) implement all practical measures to prevent stormwater run-off becoming contaminated by the activities on the Premises; and~~

~~(b) treat contaminated or potentially contaminated stormwater as necessary prior to being discharged from the Premises.~~[1]

Note1: *The Environmental Protection (Unauthorised Discharges) Regulations 2004* make it an offence to discharge certain materials into the environment.

4. Condition 1.3.1 of the Licence is amended by the deletion of the text shown in strikethrough and the insertion of the red text shown in underline below:

1.3.1 The Licensee shall ensure that all pipelines containing environmentally hazardous materials are either:

(a) equipped with telemetry systems and pressure sensors along pipelines to allow the detection of leaks and failures; and/or

(b) equipped with automatic cut-outs in the event of a pipe failure; ~~or~~ and

(c) provided with secondary containment sufficient to contain any spill for a period equal to the time between routine inspections.

5. Condition 1.3.2 of the Licence is amended by the deletion of the text shown in strikethrough and the insertion of the red text shown in underline below:

1.3.2 The Licensee shall ensure that tailings~~,~~ and decant water~~, dewatering water and effluent~~ are only discharged into containment cells, dams and ponds with the relevant infrastructure requirements and at the locations specified in Table 1.3.1.

Table 1.3.1: Containment Infrastructure

Containment point reference	Material	Infrastructure requirements
TSF ~~1, 2 and~~ 3 Cell A, B and C	Tailings	Lined with in-situ clay to limit seepage to groundwater
Process water pond	Return (decant) water	Lined with HDPE
Return water pond	Tailings seepage	Lined with HDPE

6. Table 1.3.2 of the Licence is amended by the insertion of the red text shown in underline below:

Table 1.3.2: Inspection of infrastructure

Scope of inspection	Type of inspection	Frequency of inspection
Tailings pipelines	Visual integrity	Twice daily
Return water lines	Visual integrity	Twice daily
Embankment freeboard	Visual to confirm required freeboard capacity is available	Daily

Embankment integrity	Visual inspection for signs of erosion, embankment cracking, damp or wet areas on batter slopes or toe areas.	Daily
TSF stormwater diversion channels	Visual integrity	Daily

7. Table 2.3.1 of the Licence is amended by the deletion of the text in strikethrough and the insertion of the text in red underline below:

Table 2.3.1: Monitoring of ambient groundwater quality and supernatant total dissolved solids

Monitoring point reference and location	Parameter	Units	Limits	Averaging period	Frequency
~~MB301,~~ MB302, MB303, MB304, MB305, MB306, MB307 and MB308	Standing water level[1]	mbgl	4	Spot sample	Monthly
	pH[2]	-	-	Spot sample	Quarterly
	Total dissolved solids[2]	mg/L	-	Spot sample	Quarterly
	Weak acid dissociable cyanide		0.5		
	Cadmium, copper, lead, mercury, zinc, arsenic, chromium, iron, magnesium, nickel, sodium, potassium, calcium and chloride.		-		
Any active TSF Cell - supernatant	Total dissolved solids[2]	mg/L	-	Spot sample	• Daily for six months until 7 June 2018 • Weekly from 8 June 2018

Note 1: SWL shall be determined prior to the collection of other water samples
Note 2: In-field non-NATA accredited analysis permitted.

8. The Licence is amended by the insertion of the following Condition 1.3.6 :

1.3.6 The Licensee shall ensure that each item of infrastructure or equipment specified in column 1 of Table 1.3.3 is designed and constructed in accordance with the requirements specified in column 2 of Table 1.3.3.

Table 1.3.3: Construction of TSF Embankment Raises

Column 1	Column 2
Infrastructure	**Requirements**
Perimeter tailings pipeline	Removal and reinstatement
Upstream perimeter embankment raise of TSF3 Cell A	To a maximum height of RL 399.6m. Construction to be supervised by an engineering or geotechnical specialist.
Upstream perimeter embankment raise of TSF3 Cell B and C	To a maximum height of RL 392.6m Construction to be supervised by an engineering or geotechnical specialist.
Decant towers and causeways for TSF Cell A, B and C	Relocate the decant towers and causeways to the internal embankment of each cell. Decant A raised to RL 399.7m, and Decant B and C to 392.6m.
Vibrating Wire Piezometers (VWPs)	Install a deep and shallow VWP (VWP201 – VWP 208) at the eight locations in the TSF 3 embankment as shown in Figure 2 of this Amendment Notice 1.

Areas subject to construction activities for TSF Cell A and Cell B/C Raise	Minimise dust by using water carts to wet down work areas

9. The Licence is amended by the insertion of the following Condition 1.3.7:

1.3.7 The Licensee must not depart from the requirements specified in Table 1.3.3 except:

(i) where such departures are minor in nature and do not materially change or affect the infrastructure; or

(ii) where such departure improves the functionality of the infrastructure and does not increase the risks to public health, public amenity or the environment.

If (ii) applies, then the Licensee must provide the CEO with a list of departures and demonstrate that these have not increased the risk to public health, public amenity or the environment.

10. The Licence is amended by the insertion of the following Condition 1.3.8:

1.3.8 Within six months of the date of this amendment, the Licensee must submit to the CEO a Mine Closure Plan for the Premises. The Mine Closure Plan must address remediation and closure for all disturbed areas within the Premises including the:

(i) Tailings Storage Facility, (TSF1, TSF2 and TSF3 Cells A, B and C); and

(ii) Ore processing mill and supporting infrastructure (for example stockpiles).

The Mine Closure Plan must be compliant with DMP/EPA (2015) *Guidelines for Preparing Mine Closure Plans,* issued May 2015 (or current version).

11. The Licence is amended by the insertion of the following Condition 3.2.4:

3.2.4 The Licensee shall submit a construction compliance document to the CEO within 60 days of the completion of the works, indicating construction in accord with condition 1.3.6.

12. The Licence is amended by the insertion of the following Condition 3.2.5:

3.2.5 The Licensee must ensure the construction compliance document:

(i) is certified by a suitably qualified professional engineer stating that each item of infrastructure specified in Table 1.3.3 has been constructed or completed in accordance with the conditions of the Licence;

(ii) include the records of all construction quality control testing, the basis of any method specification adopted, and any significant modifications to the original design together with the reasons why the modifications were necessary;

(iii) include copies of the as-built drawings for the embankment earthworks and pipework; and

(iv) be signed by a person authorised to represent the Licensee and contain the printed name and position of that person within the company.

13. The Licence is amended by the insertion of the following Condition 3.2.6:

3.2.6 An engineering or geotechnical specialist shall audit and review the active cell of the Tailings Storage Facility on an annual basis. The specialist shall review past performance, validate the design, examine water management, and review the results of monitoring. Any deficiencies noted in the audit and review report shall be suitably addressed and improved. The audit and review report shall be submitted to the CEO and the Inspector of Mines – Geotechnical, Resources Safety, DMIRS.

14. The Licence is amended by the deletion of the Annual Audit Compliance Report Proforma from Schedule 2 of the Licence.

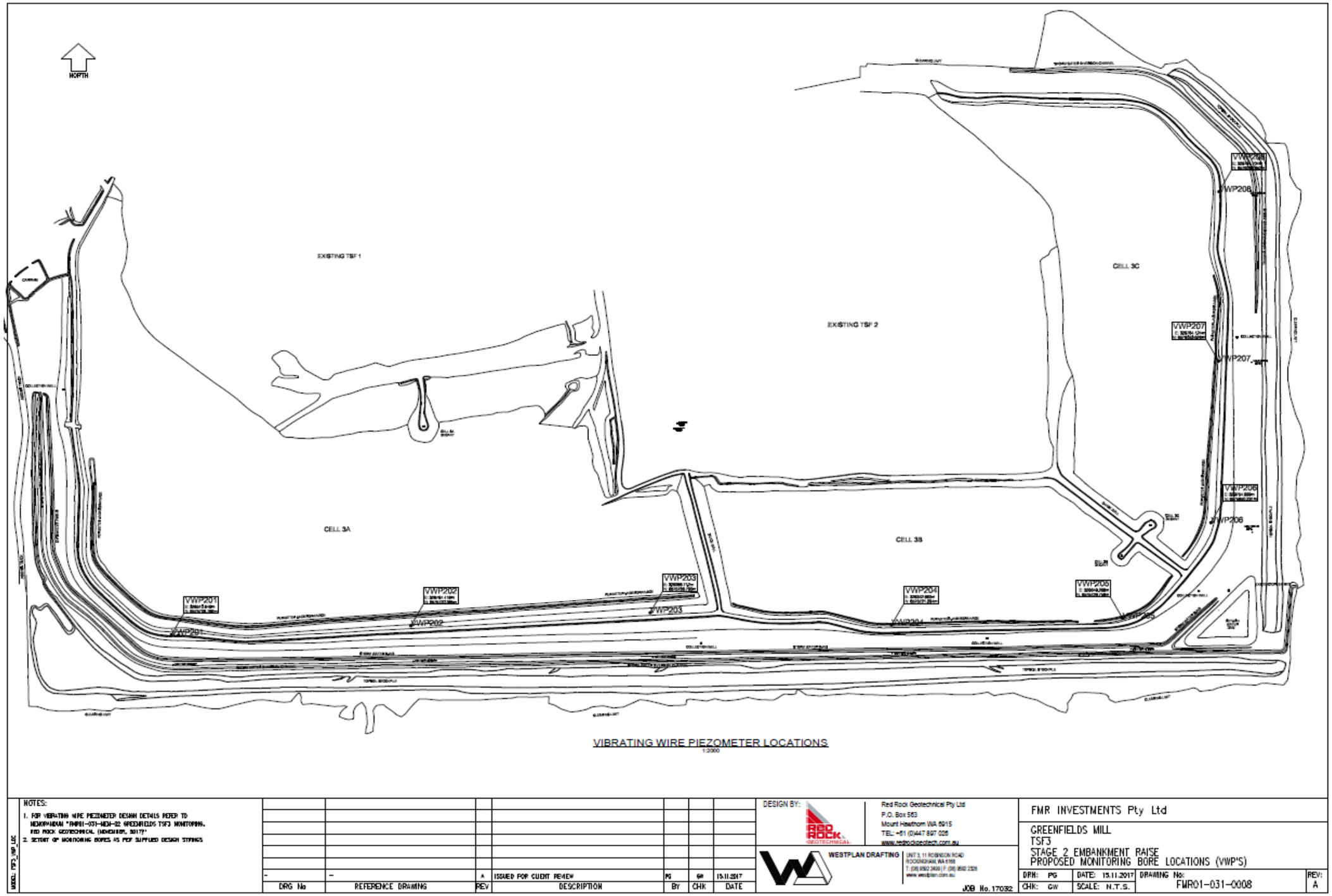

Figure 2: Vibrating Wire Piezometer locations - TSF Cell 3A, Cell 3B & Cell 3C

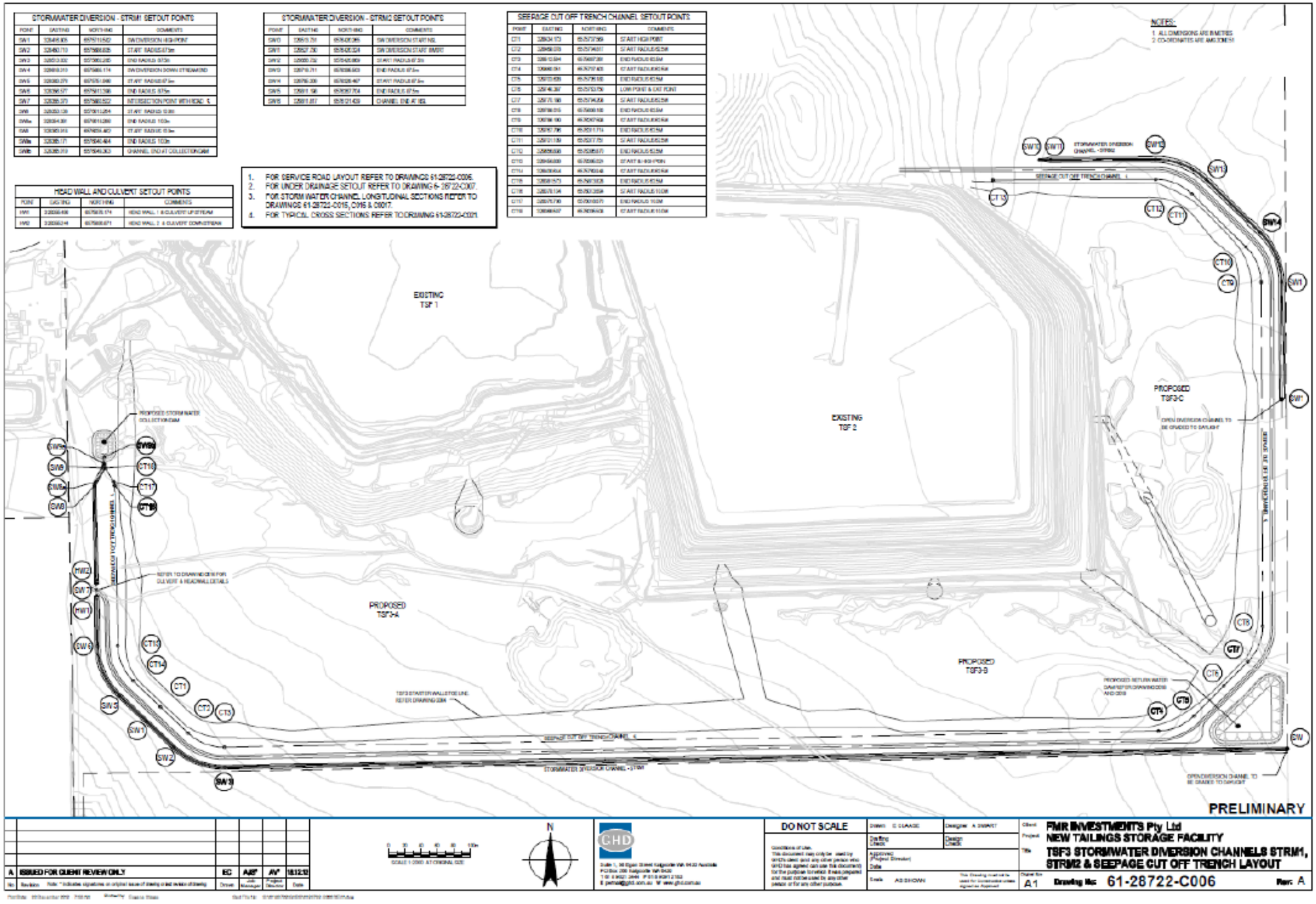

Figure 3: Location of TSF3 Cell A, B and C Toe seepage cut off trenches and stormwater diversion channels.

Appendix 1: Key documents

	Document title	In text ref	Availability
1	Adams, M.D., Donato, D.B., Schulz, R.S. and Smith, G.B., (2008) Influence of Hypersaline Tailings on Wildlife Cyanide Toxicosis; MERIWA Project M398 (II) 'Cyanide Ecotoxicity at Hypersaline Gold Operations' Final Report Volume 2 – Definitive Investigation.	Adams M.D., 2008	https://www.mriwa.wa.gov.au/publications/previous-project-reports/
2	Botanica Consulting (2017) *FMR Investments Pty Ltd Greenfields Processing Site: Preliminary Risk Assessment*	Botanica Consulting 2017	DWER records (A1533773)
3	DER, July 2015. *Guidance Statement: Regulatory principles.* Department of Environment Regulation, Perth.	DER 2015a	accessed at www.dwer.wa.gov.au
4	DER, October 2015. *Guidance Statement: Setting conditions.* Department of Environment Regulation, Perth.	DER 2015b	
5	DER, February 2017. *Guidance Statement: Risk Assessments*. Department of Environment Regulation, Perth.	DER 2017	
6	DER, November 2016. *Guidance Statement: Decision Making*. Department of Environment Regulation, Perth.	DER 2016	
7	DMP/EPA (2015) *Guidelines for Preparing Mine Closure Plans,* May 2015.	DMP 2015	accessed at: http://dmp.wa.gov.au/Documents/Environment/ENV-MEB-121.pdf
8	Licence L4680/1988/13 – Greenfields Processing Site	L4690/1988/13	accessed at www.dwer.wa.gov.au
9	Red Rock Geotechnical (2017a) *Greenfields TSF3 Cell A Stage 2 Upstream embankment raising – Works approval application*	Red Rock 2017a	DWER records (A1438314)
10	Red Rock Geotechnical (2017b) *Greenfields TSF3 Cells B and C Stage 2 Upstream embankment raising – Works approval application*	Red Rock 2017b	DWER records (A1438321)

Appendix 2: Summary of Licence Holder comments

The Licence Holder was provided with the draft Amendment Notice on 1 December 2017 for review and comment. The Licence Holder responded on 6 December 2017. The following comments were received on the draft Amendment Notice.

Condition	Summary of Licence Holder comment	DWER response
1.3.2	Confirmation that the Return Water Pond is lined with HDPE.	Noted
1.3.8	Edit suggested with removal of 'the'	Adopted
Table 2.3.1	Frequency of monitoring of TDS to be reduced after six months of daily monitoring, pending results.	Accepted. In the event that results do not meet the threshold for salinity (>50 000 mg/L) daily monitoring will be maintained at the six month period.
Table 2 of this Amendment Notice (not a condition)	Additional information about TSF 3 Cell A provided.	Added to Table 2.