



Application to replace expiring licence

Part V Division 3 of the *Environmental Protection Act 1986*

Licence Number	L6149/1988/9
Applicant	Simcoa Operations Pty Ltd
File Number	2013/003874-1
Premises	<p>Moora Quartzite Mine Site, Midlands Road, MOORA WA 6510</p> <p>Legal description M70/191, G70/91, G70/92 & G70/93 Midlands Road, MOORA WA 6510 As defined by the map in Schedule 1 and the premises coordinates in Schedule 2.</p>
Date of Report	1 October 2021
Proposed Decision	Licence granted

Neville Welsh
Senior Industry Regulation Officer

An officer delegated under section 20 of the Environmental Protection Act 1986

1. Application summary

On 23 June 2021, Simcoa Operations Pty Ltd (Licence Holder) applied to renew the licence L6149/1988/8 as the licence is due to expire on 4 October 2021. The Premises is located approximately 15 km north of Moora townsite in the Shire of Moora. The licence relates to prescribed premises categories as described below in Table 1.

Table 1: Premises category description and production design capacity

Prescribed premises category description (Schedule 1, <i>Environmental Protection Regulations 1987</i>)	Assessed production capacity
Category 5: processing and beneficiation of metallic and non-metallic ore.	160,000 tonnes per annual period

The main activities occurring on the premises include the extraction and crushing and wet screening of quartzite in preparation for transport off-site. The activities at the Moora Mine occur within tenement M70/191 expires on 4/09/2026. There are also stockpiles for quartzite ore located within G70/91 (3/1/2033), G70/92 (3/1/2033) and G70/93 (3/1/2033).

There are two existing open pits within the premises, West Pit and Main Pit which have been mined for over 30 years. Schedule 3 of the licence shows the layout of the mining operations.

Up to approximately 420,000 tonnes of ore is mined per annum, producing approximately 130,000 or 160,000 tpa of high purity quartzite and approximately 290,000 tpa of waste rock. Up to approximately 100,000 tpa of this waste rock, which includes material chemically unsuitable for silicon smelting, or undersized material from the crushing circuit, is diverted to the quartz aggregate market.

Quartz material is mined using drill and blast methods. The loose material is removed using excavators and front-end loaders, and it is trucked to the ROM and temporarily stockpiled ahead of processing. The material is processed using a primary jaw crusher and two secondary and tertiary cone crushers. The ore is then wet screened onsite and then stockpiled at the railway siding ahead of being trucked to the Smelter at Kemerton.

Further development of the West and Main pits requires clearing of areas of native vegetation. Recent amendment to the existing Part IV ministerial statement (MS813) has approved the dewatering of these pits with discharge water discharged to Kiaka creek that flows into the Coonderoo River wetlands. The Coonderoo River Wetlands is a historic saline wetland system located approximately 4.5 km northwest of the Mine.

The site generates a small amount of air emissions from power generation and diesel generators and mine site machinery and equipment. Noise, dust, vibration from blasting and contaminated water are the main emissions that have been assessed for the part V licence. Dewater discharge, although only recently approved, is regulated under the Ministerial Statement.

2. Regulatory framework

The department has determined to undertake an administrative renewal of the licence and has not conducted a full review and risk assessment of emissions and discharges from the premises in line with the Department's *Work Instruction: Regulatory Services, COVID-19 licensing position*.

In replacing the licence, the department has considered and given due regard to its regulatory framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

3. Complaints and Incident History

There have been no incidents or complaints identified at the premises by the Department during the last five years since the premises has operated. Last recorded incident occurred on 27 July 2016 and was about the lack of information provided in the Annual Environmental Report (DWER reference ICMS41716).

4. Decision summary

Under the regulatory framework the Delegated Officer has determined to grant the licence L6149/1988/9 without conducting any additional assessment or risk assessment.

The licence requires review, including an updated risk assessment to accurately reflect current operations. Therefore, the replacement licence will be issued for approximately 10 years being the tenure of the mining tenements held by the Licence Holder.

In renewing the licence the Delegated Officer has determined to:

- update the format and appearance of the licence plus correct clerical mistakes and unintentional errors;
- remove redundant definitions and conditions;
- include conditions considered necessary for the effective administration of the licence (i.e. record keeping and reporting requirements); and,
- transfer relevant existing regulatory controls and conditions to the renewed licence.

As a result of this decision, a renewed Licence L6149/1988/9 has been granted for the mining lease tenure and subject to conditions set out in the attached licence and summarised below.

4.1 Summary of administrative changes

Section 62 of the EP Act provides general power to impose conditions on licences. All licences are issued with conditions as per *Guidance Statement – Setting Conditions* (October 2015) for the purposes of the EP Act to prevent, control, abate or mitigate pollution or environmental harm.

Table 2 summarizes the transfer of all appropriate conditions from the expiring licence into the renewed licence including changes made to licence conditions where required and the rationale for changes made.

Table 2: Licence conditions description and rationale

Licence condition number	Summary - previous licence condition	Conversion notes	New licence condition number
Cover page	Licence cover page.	Prepared new licence cover page and duration extended to mining tenement tenure expiring on 4/10/2032.	N/A
	Assessed production capacity	Changed to reflect the previous approval of 160,000 tonnes per annum.	
Page 1	Definitions	Moved to final page of the licence conditions. Included definition for annual period.	Definitions
G1	Boundary	Minor modification to existing condition and transferred to the renewed licence.	1
G2(a) and G2(b)	Annual Environmental Report	Minor modification to existing conditions and transferred to the renewed licence.	18 & 19

Licence condition number	Summary - previous licence condition	Conversion notes	New licence condition number
G3	Annual Audit Compliance Report	Standard current licence template condition for Annual Audit Compliance Report has been applied. Report is due for submission within 90 days of the end of the annual period i.e by 31 March every year remain unchanged.	20
G4(a) and G4(b)	Complaints recording and reporting	Standard current licence template condition for complaints recording has been applied. Records remain included in the annual environmental report required by condition 19(ix).	21
A1(a), A1(b) and A1(c)	Dust controls	Minor modification to existing condition and transferred to the renewed licence.	2, 3 & 4
W1(a) to W1(e)	Liquid Waste storage	Minor modification to existing condition and transferred to the renewed licence.	5, 6, 7, 8 & 9
W2	Retention of Stormwater	Minor modification to existing condition and transferred to the renewed licence.	10
W3	Discharge of Water	Minor modification to existing condition and transferred to the renewed licence.	11
W4	Discoloration Floating Matter	Minor modification to existing condition and transferred to the renewed licence.	12
W5	Vehicle washdown areas	Minor modification to existing condition and transferred to the renewed licence.	13
W6	Protection of water pollution control system	Minor modification to existing condition and transferred to the renewed licence.	14
W7	Minimizing water run-off	Minor modification to existing condition and transferred to the renewed licence.	15
A2	Ambient Dust limit and monitoring	Minor modification to existing condition and transferred to the renewed licence.	16
N1	Ground vibration limits and monitoring	Minor modification to existing condition and transferred to the renewed licence.	17
New	Premises Map	New premises boundary map included in renewed licence.	Schedule 1
New	N/A	Premise boundary coordinates included in new licence	Schedule 2
New	N/A	Site Layout map from supporting documents provided with licence renewal application	Schedule 3

4.2 Additional conditions

The renewed licence has been updated to include standard conditions for recording complaints (condition 21) and Annual Audit Compliance Report (conditions 20) in line with DWER's *Guidance Statement – Setting Conditions 2015*.

These are new standardized conditions to allow for the effective reporting and administration of the replacement licence.

5. Consultation

The draft licence and this decision report were provided to the licence holder on 20 September 2021 for comment.

The licence holder replied on 23 September 2021 commenting that new condition number 16 addressing “Ambient Dust Limit” by lengthening the monitoring period from 15 minutes per hour to 30 minutes every 2 hours. Nothing else would change for condition 16(i).

The Delegated Officer considers this request as logical and reasonable without requiring a change to the risk assessment at the premises. Therefore, condition 16 point (i) was amended in the replacement licence L6149/1988/9.

6. Conclusion

Based on the assessment in this Decision Report, the Delegated Officer has determined that the renewed licence L6149/1988/9 will be granted. The licence is subject to conditions commensurate with the determined controls as well as conditions necessary for administration and annual reporting requirements.