



Application for Licence Amendment

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

Licence Number	L7969/2004/3
Licence Holder	Black Cat (Paulsens) Pty Ltd
ACN	657 781 194
File Number	APP-0029282
Premises	Paulsen's Gold Operation Nanutarra-Munjina Road Legal description – Mining Leases M08/99 and M08/196 PARABURDOO WA 6754 As defined by the Premises map in Schedule 1 of the Revised Licence
Date of Report	29 October 2025
Decision	Revised licence granted

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1. Decision summary

Licence L7969/2004/3 is held by Black Cat (Paulsens) Pty Ltd (Licence Holder) for the Paulsen's Gold Operation (the Premises), located approximately 160 kilometres west of Paraburdoo.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the Premises. As a result of this assessment, Revised Licence L7969/2004/3 has been granted.

The Revised Licence issued as a result of this amendment consolidates and supersedes the existing Licence previously granted in relation to the Premises. The Revised Licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, 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>.

2.2 Application summary

On 28 May 2025, the Licence Holder submitted an application to the department to amend Licence L7969/2004/3 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- To authorise the ongoing operation of works completed under works approval W5651/2014/1 to operate the Tailings Storage Facility (TSF) 'Stage 8' embankment raise at relative level (RL) 208.5 metres (m); and
- Add prescribed premises Category 57 for the storage of up to 200 used tyres per annum (pa) at the Premises,

Additionally, a CEO-initiated amendment has been undertaken to:

- Extend the duration of the licence until 7 November 2030.

This amendment is limited only to changes to Category 5 activities from the Existing Licence and the inclusion of a new category (Category 57) to the Licence. No changes to the aspects of the existing Licence relating to Category 52, 63, 64 and 85 have been requested by the Licence Holder.

2.3 Description of proposed activities

The Premises commenced gold mining production in 2005 until it was placed in care and maintenance in 2017. The Premises was previously operated by Northern Star Resources Ltd until the operation was purchased by the Licence Holder and a licence transfer was granted on 5 August 2022. Since the Licence Holder took ownership of the Premises, maintenance and refurbishment activities have been undertaken under works approval W6842/2023/1 and the construction works associated with the TSF stage 8 embankment raise have been completed under works approval W5651/2014/1. The operation is currently in its commission phase with the aim to move into full production in 2025.

2.3.1 Amendment to Category 5 activities – TSF Stage 8 lift

The TSF at the Premises was designed to include nine construction stages. The Licence Holder currently has authorisation under L7969/2004/3 to operate the TSF until the end of the Stage 7 maximum embankment height, being 14.85m. The Licence Holder was authorised under works approval W5651/2014/1 for the construction, environmental commissioning and time limited operations for the TSF Stage 8 embankment raise.

2.3.1.1 Compliance with Works Approval W5651/2014/1

The construction of the TSF Stage 8 embankment raise was completed in November 2024. The Licence Holder was authorised under W5651/2014/1 under Stage 8 to raise the embankment by 1.5m to a maximum embankment crest height of 16.35m (RL 208.65m). A Critical Containment Infrastructure Report (CCIR) for the embankment raise construction was submitted to the department on 12 February 2025 and was deemed to be compliant with conditions 2, 3, 7 and 8 of W5651/2014/1. The CCIR confirmed that the embankment crest height of Stage 8 was constructed to a reduced height from 16.35m to 16.2m (RL 208.5m). An Environmental Compliance Report was also submitted to the department on 12 February 2025 following the construction of the tailing's delivery pipelines and spigots for the TSF Stage 8 lift. The Licence Holder demonstrated compliance against conditions 1, 5 and 6 of W5651/2014/1.

Environmental Commissioning of TSF Stage 8 commenced on the 16 December 2024 and concluded on the 14 January 2025. An Environmental Commissioning Report was submitted to the department on 27 May 2025 following completion of the commissioning period and it was determined that the report met the requirements of conditions 10, 11 and 15 of W5651/2014/1. The Licence Holder commenced time-limited operations for Category 5 activities at the Premises on 11 April 2025 and will continue operations under the revised licence is granted. The completed TSF Stage 8 embankment raise will provide up to 13.2 months of tailings storage capacity at an average production rate of 480,000 tpa.

2.3.2 Inclusion of Category 57 activities to Licence

The Licence Holder currently stores less than 100 tyres at the Premises in the location shown in Figure 1 below. The used tyre storage area is located within a flat area, abutting the waste rock dump in a boundary that has been constructed with rock. The proposed licence amendment is to expand the tyre storage area to accommodate the storage of up to 200 used tyres at any one time which would meet the throughput capacity of prescribed premises Category 57: Used tyre storage. The tyre storage area will be graded to create surface water diversion/bunds to ensure all clean stormwater is diverted away from any potentially contaminated stormwater or firefighting water. The tyre storage area is located more than 100m from any hydrocarbon storage areas.

The Licence Holder has considered the standards for storage requirements set out in the Department of Fire and Emergency Service's (DFES) Guidance Note (GN02) on the '*Bulk storage of rubber tyres including shredded and crumbed tyres*' and classified the storage of 200 tyres as a 'large tyre facility'. The Licence Holder has proposed a number of controls in accordance with the standards set out in the DFES GN02 to manage the risk of unauthorised fires and contaminated firefighting water and/or stormwater impacting upon nearby receptors as detailed in Table 1.



Figure 1: Expanded Used Tyre Storage Area

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this Amendment Report are detailed in Table 1 below. Table 1 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 1: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Operation of TSF Stage 8 embankment raise			
Dust from dry tailings	Lift-off from the surface of the TSF Stage 8 Transportation of tailings material	Air/windborne pathway	The applicant has not proposed any controls for managing dust lift-off from the surface of the TSF.
Seepage of leachate	Deposition of tailings into TSF	Seepage of tailings leachate from base and embankments of TSF into soil and groundwater.	The applicable controls from the existing Licence to manage seepage impacts include: - Existing condition 6 (previously Condition 3) for daily visual inspections of the TSF for: - assessment of the tailings decant pond to determine the pond size and location; - daily visual integrity of the tailings delivery and return pipelines; - monitoring tailings deposition including flow rate at spigots, beach formation, beach freeboard, beach erosion and low points; and - daily visual integrity of the toe drains and silt trap to check for any leakage. - Existing condition 1 (previously Condition 4) to ensure corrective action is undertaken if seepage or spills of tailings constituents are

Emission	Sources	Potential pathways	Proposed controls
			identified during inspections; - Existing condition 6 (previously Condition 5) requires a logbook to be maintained of all inspections of the TSF and pipelines undertaken; - Existing condition 21 (previously Condition 8) for the quarterly groundwater monitoring to monitor changes to standing water levels and groundwater quality in response to tailings deposition to the TSF; and - Existing condition 22 (previously Condition 9) for the implementation of the specified management actions outlined in Table 10 (previously table 4) in the case of a reportable event (If Sulfate concentration limit exceeded during monitoring of representative samples).
Tailings or decant return water with elevated metals and metalloids	Deposition of tailings into TSF	Direct discharge to land - overtopping of TSF Overland runoff of salts, metals and metalloids during significant rainfall events	The applicable controls from the existing Licence that manage the risk of overtopping of TSF (Stage 8) include: - Existing Condition 3 (previously Condition 2) requires the maintenance of a 300mm operational freeboard; and - Controls from works approval works approval W5651/2014/1 for freeboard to amalgamated with Condition 3 above. - Existing Condition 6 (previously Condition 3) for the daily visual inspections of the TSF for: - assessment of the tailings decant pond to determine the pond size and location; - monitoring tailings deposition including flow rate at spigots, beach formation, beach freeboard, beach erosion and low points; and - the internal embankment freeboard to confirm freeboard capacity is available. - Existing condition 1 (previously Condition 4) to ensure corrective action is undertaken if seepage or spills of tailings constituents are identified during inspections;

Emission	Sources	Potential pathways	Proposed controls
			- Existing condition 6 (previously Condition 5) requires a logbook to be maintained of all inspections of the TSF and pipelines undertaken; and - Existing Condition 4 (previously Condition 7) requires the maintenance of the required storm water contingency freeboard for a 1 in 100-year 72 hour storm at the Stage 8 operating height.
Stormwater contaminated with tailings and tailings liquor	Deposition of tailings into TSF	Direct discharge to land to soil and surface water via runoff during rainfall events	The following control was conditioned as part of Works Approval W5651/2014/1 to manage the risk of stormwater runoff: - All embankment crests to have a 2% inward crossfall to direct surface water runoff into the TSF basin. The Applicant has also proposed the following additional controls to manage the risk of stormwater runoff: - Diversion channels located along the south-east and western walls to divert the clean water away from the facility; - Two catchment sumps shall be maintained to ensure runoff is collected from the TSF catchment; and - Toe drain and silt trap shall capture any potential seepage and sediment.
Tailings or decant return water with elevated metals and metalloids	Transport of tailings and decant return water via pipelines between TSF and processing plant	Seepage through the soil profile to groundwater from pipeline leak/rupture. Overland runoff of salts, metals and metalloids during significant rainfall events.	The applicable controls from the existing Licence that manage the risk associated with a pipeline failure between the processing plant and TSF are outlined below: - Existing Condition 6 (previously Condition 5) requires that all above-ground pipelines containing environmentally hazardous substances are either: - equipped with telemetry; or - equipped with automatic cut-outs in the event of a pipe failure; or - provided with secondary containment sufficient to contain any spill for a period equal to the time between routine inspections. - Existing condition 6 (previously

Emission	Sources	Potential pathways	Proposed controls
			Condition 3) requires the daily visual inspection of tailings pipelines and return waterlines.
Operation of Use Tyres Storage Area			
Unauthorised tyre fires – particulates and noxious gases (smoke)	Tyre storage on premises	Air/windborne pathway	The Licence Holder has proposed the following controls for managing the risk of unauthorized tyre fires occurring: • Tyres will be stored in accordance with DFES Guidance note (GN02) <i>'Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres'</i> where the following requirements will be implemented: - Tyre stacks (4x4) not to exceed 12.5 tonnes in weight; - A maximum of four individual stacks grouped, with a clear separation distance of not less than 2.5m at the base between each stack; and - A minimum distance of 6m between stacked groups. • Implementation of a Fire Prevention Management Plan that will be adhered to in the event of a fire; • A dedicated onsite fire truck can supply 3,000 litres (L) of water and 200 L of B-Class foam in the event of a fire; • A fire hydrant located at the fuel farm 600m from the tyre storage area can be used for refilling; • A trained emergency response team is located at the Premises; and • Tyre storage area shall be located more than 100m from hydrocarbon storage areas.
Contaminated firefighting water and/or stormwater from the tyre storage area		Direct discharge to land, subsurface seepage	The Licence Holder has proposed the following controls for managing the risk of contaminated firefighting water and/or stormwater from suppression of tyre fires: • The tyre storage area will be graded to create surface water/diversion bunds to ensure all clean stormwater from the surrounding area is diverted and any contaminated water is contained.

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 2 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Pastoral stations: • Mt Stuart Station • Wyloo Station	Mt Stuart station overlaps the entire premises. • Wyloo station boundary 5km east of the premises; and • Both homesteads are greater than 3km from works. Receptor screened out of assessment due to separation distance.
Environmental receptors	Distance from prescribed activity
Remnant Native vegetation	Remnant native vegetation is located adjacent to the TSF and tyre storage area.
Conservation significant fauna	According to the Department of Biodiversity, Conservation and Attractions (DBCA) database, two conservation significant fauna species have been recorded within the Premises boundary: • the Pilbara leaf-nosed bat (<i>Rhinonicteris aurantia</i>) listed as 'Vulnerable' under the <i>Biodiversity Conservation Act 2016</i> (BC Act): - 596 metres south of the tyre storage area; and - 685 metres south east of the TSF. • fork-tailed swift (<i>Apus pacificus</i>) listed as 'Specially Protected migratory species' under the BC Act: - 1.7 kilometres south west of the tyre storage area; and - 1.08 kilometres south of the TSF.
Surface water lines	The Premises intersects the Pilbara Surface Water Area under the <i>Rights in Water and Irrigation Act 1914</i> . A non-perennial watercourse runs approximately 270 metres east of the tyre storage area and 320 metres northwest of the TSF.
Groundwater	The standing water levels for groundwater during the environmental commissioning of TSF (Stage 8 lift) indicated that groundwater levels range from 23.08

	mbgl to 25.05 mbgl. Groundwater quality at the premises is 'brackish' ranging from 1,100 to 8,000 mg/L Total Dissolved Solids.
Aboriginal and heritage sites located within the premises: • Jirtilkanku Hill (19,036) • Jirtilkanku Camping Ground (19,037) • PAULSEN'S SITE 2 (18693) • SBM-01 Artefact Scatter (19,044) • SBM-02 Artefact Scatter (19,045) • SBM-03 Artefact Scatter (19,046) • SBM-04 Artefact Scatter (19,047) • SBM-05 Artefact Scatter (19,048) • SBM-06 Artefact Scatter (19,049) • SBM-07 Artefact Scatter (19,050) • SBM-08 Artefact Scatter (19,051) • Kurtjirli Creek (19,042) – stored data/not a site.	Jirtilkanku Hill is a mythological site that covers the whole L7969/2004/3 premises; and The Jirtilkanku Camping Ground is located 150 metres east of the TSF. The Jirtilkanku Hill is located 153 metres east of the tyre storage area.

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

The Revised Licence L7969/2004/3 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. Category 5 and Category 57 activities.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 3. Risk assessment of potential emissions and discharges from the Premises during operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Category 5: Processing or beneficiation of metallic or non-metallic ore								
Source: TSF Stage 8 lift Activity: Deposition of tailings in TSF following embankment raise Transportation of tailings material	Dust lift off (dry tailings)	Pathway: Air/windborne pathway Impact: Reduced native vegetation health or native vegetation death that may represent habitat for threatened fauna.	Remnant native vegetation adjacent to TSF Threatened fauna species (closest recorded 685 metres south east of the TSF) Aboriginal Heritage Sites (closest being 150 metres east)	Licence Holder has not proposed any controls.	C = Moderate L = Possible Medium Risk	N	<u>Condition 2 (Table 1): Operational requirements</u> <u>Condition 6 (Table 4): Inspection of infrastructure</u> <u>Conditions 16 and 17: Dust emissions management</u>	There are currently no existing conditions on the licence for regulating dust emissions for the Premises and no controls have been proposed by the Licence Holder. There is a possible likelihood that dust emissions may occur as a result of dust lift-off from the surface of the TSF resulting in a moderate consequence to nearby environmental receptors. Additional regulatory controls will be added to the licence to manage the risk of dust emissions as a result of the prescribed premises activity. These include controls for managing dust during the transportation of tailings material including ensuring a vehicle with water cannon is available at all times during operations, wetting down roads, ceasing dust generating activities during strong wind conditions and limiting haulage truck speeds. The inspection of infrastructure condition has been amended to include a quarterly inspections inspection to monitor dust emissions including a visual assessment of adjacent native vegetation.
	Seepage of leachate from	Pathway: Seepage of leachate from base and	Surface water lines in proximity to	Refer to Section 3.1	C = Moderate	N	Existing conditions on L7969/2004/3 relating to:	The Delegated Officer has taken into consideration the applicable controls on the existing licence and determined that

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Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
	TSF	embankments of TSF into soil and groundwater. Impact: Mounding of groundwater table causing vegetation stress or deaths due to increased salinity within root zones of vegetation.	the TSF (closest being non-perennial watercourse 320 metres north-west). Remnant native vegetation adjacent to TSF Aboriginal Heritage Sites (closest being 150 metres east)		L = Unlikely Medium Risk		- Condition 1 (previously condition 4): Corrective action if seepage of tailings is identified during inspections. <u>Condition 6 (Table 4) (previous condition 3): Inspection of infrastructure.</u> - Condition 21 (previously condition 8): Quarterly groundwater monitoring. - Condition 22 (previously condition 9): Implementation of specified management actions if trigger limits met	these are sufficient for managing the potential impacts of seepage of leachate from the TSF. An amendment to condition 6 (previously condition 3) to include an additional regulatory control to undertake a visual assessment of the TSF perimeter embankment to check for evidence of seepage has been added to the licence.
	Tailings or decant return water with elevated metals and metalloids	Pathway: Direct discharge to land - overtopping of TSF Overland runoff of salts, metals and metalloids during significant rainfall events Impacts: Reduced quality or contamination of soil, and/or sediment. Reduced native	Surface water lines in proximity to the TSF (closest being non-perennial watercourse 320 metres north-west). Remnant native vegetation adjacent to TSF	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Existing conditions on L7969/2004/3 relating to: - Condition 3 (previously condition 2): Freeboard operational requirements - Condition 4 (Table 3) (previously condition 7): Staged construction and operating height with stormwater contingency freeboard - Condition 6 (Table 4) (previously condition 3): Inspection of	There is a risk of overtopping of the TSF cell if deposition into the cell exceeds the holding capacities or during a significant rainfall even which could result in the contamination of surrounding soils and groundwater with toxic metals and metalloids, dissolved solids and cyanide reducing vegetation growth. The Delegated Officer has determined that the likelihood of the TSF overtopping occurring is unlikely due to the Applicant's control which includes the maintenance of a 300mm operational freeboard which includes the allowance of a 1 in 100 year, 72 hour rainfall event during operation.

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Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
		vegetation health or native vegetation death	Aboriginal Heritage Sites (closest being 150 metres east)				infrastructure	Condition 3 (previously condition 2) has been updated to be reflective of the operating requirements of the TSF as per works approval W5651/2014/1 which includes allowance for 1 in 10-year ARI wet season runoff and a 1 in 100-year design extreme storm event. The Delegated Officer also took into consideration the existing inspection condition on the Licence which requires the daily visual assessment of the tailings decant/supernatant pond to determine size and location and the internal embankment freeboard to confirm freeboard capacity is available.
	Stormwater contaminated with tailings and tailings liquor	Pathway: Direct discharge to land to soil and surface water via runoff during rainfall events. Impacts: Contamination to soil and surface water bodies located in close proximity to the TSF. Reduced quality of native vegetation.	Surface water lines in proximity to the TSF (closest being non-perennial watercourse 320 metres north-west). Remnant native vegetation adjacent to TSF Aboriginal Heritage Sites (closest being 150 metres east)	Licence Holder has not proposed any controls.	C = Moderate L = Unlikely Medium Risk	N	Condition 2 (Table 1): Operational requirements for stormwater management	There are currently no existing conditions on the licence for regulating contaminated stormwater emissions with tailings for the Premises and no controls have been proposed by the Licence Holder. There is a potential for contaminated stormwater to impact on nearby environmental receptors including surface water lines and an Aboriginal Heritage Site. To Delegated Officer has included additional regulatory controls on the licence to ensure potentially contaminated water is kept separate from uncontaminated stormwater.

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Source: Tailings and return water pipelines Activity: Transport of tailings and decant return water via pipelines between TSF and processing plant.	Tailings or decant return water with elevated metals and metalloids	Pathway: Seepage through the soil profile to groundwater from pipeline leak/rupture. Overland runoff of salts, metals and metalloids during significant rainfall events. Impacts: Contamination of soils and deterioration of groundwater quality inhibiting the survival of remnant native vegetation. Conservation significant fauna gaining access to the TSF may ingest decant return water or tailings affecting the health of the fauna species. Entrapment and drowning may also occur. Overland flow following a spill event may impact on surface water bodies if not properly	Surface water lines in proximity to the TSF (closest being non-perennial watercourse 320 metres north-west). Remnant native vegetation adjacent to TSF Aboriginal Heritage Sites (closest being 150 metres east) Threatened fauna species (closest recorded 685 metres south east of the TSF)	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Existing conditions on L7969/2004/3 relating to: - Condition 6 (previously condition 5): Above-ground pipeline requirements containing environmentally hazardous substance - Condition 6 (Table 4) (previously condition 3): Inspection of infrastructure	The Delegated Officer considers the likelihood of tailings or return water being released into the environment from a pipeline leak or rupture is considered unlikely due to existing conditions on the Licence which include regular daily visual inspections and pipeline infrastructure requirements as outlined under Section 3.1. No additional regulatory controls are required.

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
		contained						
Category 57: Used tyre storage (general)								
Tyre storage on premises	Fire – particulates and noxious gases (smoke)	Pathway: Air/windborne pathway Impacts: Reduced native vegetation health or native vegetation death that may represent habitat for threatened fauna. Impacts to Aboriginal Heritage sites	Remnant native vegetation adjacent to tyre storage area Threatened fauna species (closest recorded 685 metres south east of the TSF) Aboriginal Heritage Sites (closest being 150 metres east)	Refer to Section 3.1	C = Moderate L = Rare Medium Risk	Y	Existing conditions on L7969/2004/3 relating to: Condition 10 (previously condition 16): Management of waste	The Delegated Officer has taken into account the Licence Holder's proposed controls and considers that the controls are sufficient for managing the risk of a fire as a result of tyre storage at the Premises. The Applicant's controls have been conditioned on the Licence under existing condition 10 (previously condition 16). It is noted that the Licence Holder has specified a separation distance of 6m from each pile of 4 stacks, however the DFES GN02 states that a clear separation distance of not less than 18m must be maintained between each pile of 4 stacks to manage the risk of a fire event due to tyre storage. This has been conditioned as a requirement of the Licence.
	Contaminated firefighting water and/or stormwater from the tyre storage area	Pathway: Direct discharge to land, subsurface seepage Impact: Contamination to soil and surface water bodies located in close proximity to the tyre	Surface water lines in proximity to the tyre storage area (closest being non-perennial watercourse (270 metres east))	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Existing conditions on L7969/2004/3 relating to: - Condition 10 (previously condition 16): Management of waste - Condition 2 (Table 1): Operational requirements for stormwater management	The Delegated Officer considers the Licence Holder's proposed control of grading the tyre storage area to create a surface water diversion bund which will ensure potentially contaminated water is kept separate to uncontaminated water. Condition 18 (previously condition 2) has been updated to include the requirement for stormwater runoff to be diverted away from landfill sites.

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Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
			Aboriginal Heritage Sites (closest being 153 metres east)				Condition 18: (previously condition 14)	

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020).

Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment on 10 October 2025.	Refer to Appendix 1.	Refer to Appendix 1.

5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

5.1 Summary of amendments

Table 5 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 5: Summary of licence amendments

Condition no.	Proposed amendments
DWER file number	Administrative updates.
Duration	Licence extended to 8 November 2030
Prescribed Premises category description	Inclusion of Category 57: Used tyre storage to the licence.
Licence History table	Updated to current format. Inclusion of current amendment details.
Interpretation	Administrative updates to current form.
Condition 1	Previous condition 4. Administrative update to current standard general condition. The previous condition 4 was restricted to tailings recovery being returned to the TSF but the new standard condition includes the recovery of tailings, fuel, oil or other hydrocarbons and does not specify the point to where the recovered material must be recovered, removed or disposed of.
New Condition 2 (Table 1)	Operational requirements table added to licence to include processing plant requirements and remove redundant paste plant. This has been included noting the Premises has come out of care and maintenance and moved to full production this year. Stormwater management and water cart infrastructure added to manage stormwater and dust emissions at the Premises.
Condition 3 (Table 2)	Previous condition 2. Updated to reflect construction and operation controls from W5651/2014/1 for TSF freeboard for Stage 8 lift.

Condition 4 (Table 3)	Previous condition 7 (Table 2). Inclusion of Stage 8 operating height for TSF
Condition 5	Previously condition 6. Amended to align with construction requirements from W5651/2014/1.
Condition 6 (Table 4)	Previously conditions 3 and 5. Updated to standard condition with the inclusion of a visual inspection of TSF perimeter embankments and dust-lift off. Ponding on the surface of the TSF has been renamed as 'Decant pond'.
Condition 7	Previous condition 10.
Condition 8	Previous condition 11.
Condition 9	Previous condition 12.
Condition 10 (Table 5)	Previous condition 16 (Table 6). Administrative updates to table and inclusion of Category 57: Used Tyre Storage.
Condition 11	Previous condition 17. Administrative updates.
Condition 12 (Table 6)	Previous condition 18 (Table 7). Amended wording for the cover requirements for putrescible waste to make it clear that three monthly cover is only for the current cell until it has reached capacity. Monthly cover is required for any other putrescible waste disposal. Updated disposal timescale for Inert Waste Type 2.
Condition 13	Previous condition 19. Administrative updates.
Condition 14	Previous condition 20. Administrative updates.
Condition 15 (Table 7)	Previous condition 1 (Table 1). Administrative updates.
New Condition 16 and Condition 17	Inclusion of conditions to manage dust emissions at the Premises.
Condition 18	Previous condition 14. Updated to include the management of stormwater emissions at landfill sites.
Condition 19 (Table 8)	Previous condition 13 (Table 5). Table updated to current standard table format and includes wastewater sampling methods previously detailed in condition 15.
New Condition 20	Replacement of condition 15. Requirement for analysis to be carried out by NATA accredited laboratories.
Condition 21	Previous condition 8. Administrative update.
Condition 22 (Table 9)	Previous condition 9 (Table 3). Administrative update.
Condition 23 (Table 10)	Previous condition 9 (Table 4). Administrative update.
Condition 24 (Table 11)	Previous condition 21 (Table 8). Administrative update.
Condition 25	Inclusion of standard record condition for recording complaints.

Condition 26	Inclusion of standard record condition for the Licence.
Condition 27	Inclusion of standard record condition related to condition 26.
Condition 28	Previous condition 23. Updated Annual Audit Compliance report standard condition.
Condition 29 (Table 12)	Previous condition 22. Annual Environmental Report updated to current formatted condition.
Definitions (Table 13)	Previous Table 10. Updated to include additional definitions.
Schedules 1 to 6 Maps and figures	Figures 2, 9 and 10 have been updated in the Schedules.
Conditions removed	Condition 24 (Table 9), Condition 25, Condition 26 Conditions removed as redundant (works for inert landfill completed). Operational requirements for inert landfill have been added to condition 10 (Table 5).

References

1. Black Cat Syndicate, 2025, *Supporting Information for Licence Amendment (L7969/2004/3) – Paulsens Gold Operation*, West Perth, Western Australia.
2. Black Cat Syndicate 2025a, *Response to DWER Request for Further Information for Licence L7969/2004/3 Amendment Application*, West Perth, Western Australia.
3. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. Department of Fire and Emergency Services (DFES) 2020, *Guidance Note: GN02 Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres*, Perth, Western Australia.
5. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
6. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
7. Government of Western Australia 2002, *Environmental Protection (Rural Landfill) Regulations 2002*, Western Australia

Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions

Condition	Summary of Licence Holder's comment	Department's response
Condition 1 (previously condition 4)	The Licence Holder has requested to amend the corrective action in the wording of condition 1 which relates to the recovery, removal and disposal of spills of environmentally hazardous materials to 'as soon as practicable' instead of 'immediately'. The Licence Holder provided justification for the proposed alternative wording noting 'any incident must be preserved to assess the cause prior to any cleanup measures'.	The Delegated Officer has considered the Licence Holder's request to amend the wording of this condition to 'as soon as practicable' and does not agree with this proposal. The conditions that are included in licences need to meet the requirements as set out in the departments 2016 <i>Guidance Statement: Setting Conditions</i> Guidance statement: Setting conditions which specifies that conditions need to be valid, enforceable, risk-based and out-come based. The requested wording proposed by the Licence Holder 'As soon as practicable' cannot be quantitatively measured and is not enforceable as it not sufficiently clear or certain. The condition needs to be clear and precise on the outcome that must be achieved, which this wording does not provide. There is no certainty as to when action would be undertaken to mitigate any adverse effects of a spill incident occurring. As determined during the risk-based assessment, there is a medium risk of environmentally hazardous materials (tailings, decant return water, fuel, oil or other hydrocarbons) being released to the environment due to the operation of the TSF. Therefore, a risk-based and out-come based condition has been included on the licence to ensure that nearby receptors (native vegetation, surface water lines) are not impacted in the event of a breach of containment infrastructure. It is noted that this condition has only been updated as a current standard general condition on the licence, it is not a new condition. The wording of condition 1 will remain the same.
New Condition 2 (Table 1), Item 1 – Processing Plant	The Department requested the Applicant provide information on the processing plant infrastructure equipment that is currently on site as it is not currently listed on the licence. Noting the Premises have moved out of	Noted. Item 1 of Table 1 on the Licence has been updated to note the Carbon in Leach Gold Extraction Plant infrastructure that is located at the Premises.

Condition	Summary of Licence Holder's comment	Department's response
	care and maintenance and into full production this year, the site infrastructure and operational requirements for Category 5 activities needs to be listed on the licence. The Licence Holder advised that a carbon-in leach process is used for gold processing at the Premises and provided a figure outlining the process.	
New Condition 2 (Table 1), Item 2 – Paste Plant	The Licence Holder advised that the paste plant was removed during decommissioning activities before going into care and maintenance activities. The Licence Holder advised that the paste plant will not be reinstalled on site and therefore requested this item be removed. The Applicant has provided an updated figure to replace Figure 9, Schedule 4 with the paste plant label removed.	Noted. The paste plant infrastructure has been removed from Condition 2 (Table 1), Item 2 following the information provided by the Licence Holder. Figure 9 of Schedule 4 has been replaced on the revised licence accordingly.
New Condition 2 (Table 1), Item 3 – Stormwater Management infrastructure	The Licence Holder requested that the location of the Stormwater Infrastructure Management infrastructure be defined as four specific operational areas rather than in 'within the Premises boundary'. The Licence Holder requested that the location be updated to state the location of the infrastructure is located within the operational areas of the Processing Plant, tailings storage facility, tyre storage area and waste rock dump as these areas have infrastructure to control potentially contaminated stormwater. Further information on the Stormwater Management infrastructure for each area was provided.	Noted. The location of the Stormwater Management Infrastructure has been updated following the provision of this additional information. The additional information provided for the stormwater management infrastructure for the operational area of the processing plant and TSF have been included under Condition 2 (Table 1), Item 1 and updated the Licence Holder controls under Table 1.
New Condition 2 (Table 1), Item 4 – Water cart	The Licence Holder has requested that the infrastructure for the water cart be updated to 'A vehicle with a water cannon' as they have other vehicles on site for dust suppression and would like to utilise the water cart for other purposes off the premises.	The Delegated Officer considers this request by the Licence Holder to be acceptable for managing the risk of dust lift-off from the surface of the TSF during operation. This item of infrastructure in Table 1 has been updated accordingly.
Condition 5 (previously condition 6) – Operational requirement for pipeline infrastructure	The Licence Holder has advised that there is no decant water or process liquor pipelines at the Premises and has therefore requested references to these environmentally hazardous substances are removed. The Licence Holder noted that telemetry and flow meters are fitted to the tailings transfer line which connects the processing plant to the perimeter pipeline. The telemetry reports to the control room via Citech alerting in the event of a flow differential. The plant must be manually shutdown which can take up to an hour is required to prevent bogging the crusher and mill. The Licence Holder noted that if a leak were to occur it would be captured in entirety by the pipeline bunding while the plant is taken offline. For all other pipelines any leak would be captured by pipeline bunding.	Noted. The wording of Condition 5 has been updated on the revised licence accordingly.

Condition	Summary of Licence Holder's comment	Department's response
Condition 6 (Table 4) (previously conditions 3 and 5) – Inspection of infrastructure	The Licence Holder has requested that the frequency of monitoring of native vegetation adjacent to the TSF be amended from daily to quarterly asserting that it provides limited value.	The Delegated Officer has considered the Licence Holder's request and considers that reducing the frequency of vegetation monitoring to quarterly would be sufficient for managing the risk of dust lift-off from the TSF impacting upon native vegetation. Condition 6 (Table 4) of the revised licence has been updated accordingly.
Condition 12 (Table 6) (previously condition 18 (Table 7) - Cover requirements (Putrescible waste)	The Department requested the Licence Holder advise whether the trench referred to in the previous Table 7 for acceptance of putrescible waste had been completed. The Licence Holder advised that the trench is still in use and additional trenches will be established as the trenches are completed.	The Delegated Officer refers to Amendment Notice 4 which was specifically sought by the former occupier Northern Star Resources Ltd (Northern Star) for the amendment to the time scale cover requirements for putrescible wastes. Northern Star noted that they would not be able to meet the monthly cover requirements as the machinery available on site used for cover applications is not able to reach far enough over the edge of the trench to bury the waste. The Delegated Officer concluded the changes presented a low risk to human health and a moderate risk to the environment and changed the timescale requirements to the current cell only to three monthly cover. The Delegated Officer has updated the wording of the cover requirements for putrescible waste under the timescale in Table 6 to make it clear that three monthly cover is only for the current cell until it has reached capacity. Monthly cover is required for any other putrescible waste disposal. The Delegated Officer advises the Licence Holder that for additional trenches to be constructed and any increase in throughput for Category 64, a licence amendment is required to be submitted to the department for assessment.
Condition 12 (Table 6) – Cover requirements (Inert Waste Type 2)	The disposal timescale for Inert Waste Type 2 was updated in the draft revised licence to specify that this waste type is to be covered with soil by the end of the working day in which the waste was disposed of. The Licence Holder has noted that this disposal timescale proposed is not reasonably practicable and has requested to amend the time scale to 'as soon as practicable' to allow operational flexibility.	The Delegated Officer has considered the Licence Holder's request to amend the wording of this condition to 'as soon as practicable' and does not agree with this proposal. As noted above, conditions that are included in licences need to be valid, enforceable, risk-based and out-come based in accordance with the departments <i>2016 Guidance Statement: Setting Conditions</i>. The requested wording proposed by the Licence Holder 'As soon as practicable' cannot be quantitatively measured and is not enforceable as it not sufficiently clear or certain on when the outcome will be achieved. Inert Waste type 2 which consists of stable non-biodegradable organic materials such as tyres and plastics requires special

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Condition	Summary of Licence Holder's comment	Department's response
		management to reduce the risk of potential fires. Therefore, a risk-based and out-come based condition has been included on the licence to ensure that Inert Waste Type 2 is covered by Inert Waste Type 1 or soil within a specified time frame. The Delegated Officer has taken into account the small volume of waste authorised for disposal which would reduce the risk of potential fires occurring. The Delegated Officer considers the covering of waste on a fortnightly basis to be a reasonable timeframe for the Licence Holder to achieve this requirement whilst still ensuring the risk of fires is managed. The specified timeframe requirement for covering Inert Waste Type 2 has been updated in Condition 12 (Table 6) to 'fortnightly' instead of 'by the end of the working day'.
New Condition 16 and 17 – Dust emissions	The Licence Holder advised that five deposition dust monitoring stations have been installed since November 2023 and are monitored monthly. The Licence Holder has requested that the dust monitoring points be added to the Licence, however no further information was provided.	The Delegated Officer acknowledges the Licence Holder's request to add the dust monitoring points to the Licence under this amendment. However, this would require a risk-based assessment by the Department. The Delegated Officer advises that the Licence Holder is required to submit a separate licence amendment for this request.
Previous Condition 24 (Table 9), Condition 25, Condition 26 – Construction of Inert landfill with compliance	The Department requested that the Applicant confirm that the inert landfill site referred to under previous condition 24 (Table 9) has been constructed. The Department noted that if the inert landfill had already been constructed, the works specifications conditions associated to this activity will be removed from the licence and the operational requirements will be transferred to Table 5 on the licence. The Department requested a copy of the compliance report for the construction of the inert landfill site as required by previous condition 26. The Licence Holder advised that there appears to be a misunderstanding on how the inert and putrescible waste is operated at the Premises. The Licence Holder advised that the site uses disposal trenches that are progressively excavated, filled with waste and then covered. The Licence Holder advised it is not like a landfill established by a Local Council that is engineered, lined and fenced. The Licence Holder advised that there is no compliance report for either the inert or putrescible landfills.	The Delegated Officer advises the Licence Holder that the former occupier Northern Star applied for an amendment to the licence for the inclusion of prescribed premises Category 63: Inert landfill and to move the location of the inert landfill into the footprint of a Waste Rock Dump extension. A risk-based assessment was undertaken by the Department for the construction and operation of the Category 63 Inert landfill. The licence included construction requirements for the new Inert Landfill to be built in an approved location, the trench size and number is acceptable and only receives inert waste. These construction requirements are outlined under the previous condition 24 (Table 9). Previous condition 26 outlined the compliance reporting requirements following the construction of the landfill. As advised by the Licence Holder, a compliance report has not been provided in accordance with the requirements of this condition. The Delegated Officer notes this is a non-compliance relating to previous condition 26 of L7969/2004/3.

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Condition	Summary of Licence Holder's comment	Department's response
		The department does not consider this breach to present a significant environmental risk, however, have forwarded the details to its Environmental Assurance Branch to be recorded for intelligence purposes. No further regulatory action is proposed. The Delegated Officer has transferred the operational requirements to Table 5 on the licence.
Condition 28 (Previously condition 23) - Annual Audit Compliance report	The Licence Holder noted that the change to clause b in the condition appears to contain remnant information prior to the edit (ie. Submit to the CEO by 1 November).	The Delegated Officer notes this clerical error and has removed reference to the 1 November accordingly in the revised licence.
Figure 2 of Schedule 1 – Paulsens Mine Site Layout.	An updated figure replacing Figure 2 of Schedule 1 was provided by the Licence Holder to reflect the existing infrastructure at the Premises.	Updated Figure 2 of Schedule 1 accordingly to reflect the existing infrastructure at the Premises.
Figure 10 of Schedule 5 – Paulen's Landfill sites map	The Department requested that the Licence Holder provide an updated figure that includes the revised expanded tyre storage area.	The Licence Holder provided an updated figure that included the revised storage area to replace Figure 10 of Schedule 5. Updated accordingly.