Decision Report

Application for Licence

Division 3, Part V *Environmental Protection Act 1986*

Licence Number	L9208/2019/1
Applicant	Salt Lake Potash Limited
ACN	117 085 748
File Number	DER2019/000338
Premises	Salt Lake Potash Part of Mining Tenements M53/796 and M53/797 WILUNA WA 6646 As defined by the coordinates in Schedule 1 of the Licence
Date of Report	27 September 2019
Status of Report	Final

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1. Definitions of terms and acronyms

In this Decision Report, the terms in Table 1 have the meanings defined.

Table 1: Definitions

Term	Definition
ACN	Australian Company Number
Applicant	Salt Lake Potash Ltd
bgl	Below ground level
BRL	Blackham Resources Limited
Category 14	Solar salt manufacturing: premises on which salt is produced by solar evaporation
Decision Report	refers to this document.
Delegated Officer	an officer under section 20 of the EP Act.
DWER	Department of Water and Environmental Regulation As of 1 July 2017, the Department of Environment Regulation (DER), the Office of the Environmental Protection Authority (OEPA) and the Department of Water (DoW) amalgamated to form the Department of Water and Environmental Regulation (DWER). DWER was established under section 35 of the *Public Sector Management Act 1994* and is responsible for the administration of the *Environmental Protection Act 1986* along with other legislation.
EPA	Environmental Protection Authority
EP Act	*Environmental Protection Act 1986* (WA)
EP Regulations	*Environmental Protection Regulations 1987* (WA)
Existing Works Approval	The Works Approval issued under Part V, Division 3 of the EP Act and in force prior to the commencement of, and during this Review
GL	Gigalitres
HDPE	High Density Polyethylene
kL	Kilolitres
mg/L	Milligram per litre
Noise Regulations	*Environmental Protection (Noise) Regulations 1997* (WA)
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
Review	this Licence review
Risk Event	As described in *Guidance Statement: Risk Assessment*
SOP	Sulphate of Potash

tpa	tonnes per annum
TDS	Total Dissolved Solids
UDRs	*Environmental Protection (Unauthorised Discharges) Regulations 2004* (WA)

2. Purpose and scope of assessment

Salt Lake Potash Ltd (Applicant) submitted a Licence application on 4 June 2019 to the Department of Water and Environmental Regulation (DWER) for a Licence under the *Environmental Protection Act 1986* (EP Act).

With this application, the Applicant supplied a Works Approval Completion Report for the construction and installation of the following Category 14 infrastructure completed under the Existing Works Approval W6206/2018/1:

- Temporary Holding Pond, consisting of two ponds (Pond 1 and Pond 2) in series;
- Access Road, between the Williamson Pit and Temporary Holding Pond;
- Borrow Pit Haul Road, to access clay material;
- Trench to a depth of 4m, which collects local groundwater and seepage (if any) from the Temporary Holding Pond; and
- Trailer Mounted Centrifugal Dewatering Pumps, for the purpose of pumping water from Williamson Pit into Pond 1.

The Applicant is proposing to store a brine solution (evaporated mine dewater) within the Temporary Holding Pond to undertake testing and analysis over a twelve month period to support future Sulphate of Potash (SOP) projects, which are outside the scope of this assessment.

This Decision Report assesses emissions and discharges associated with the transfer of mine dewater from Williamson Mine to the Temporary Holding Pond, construction of the Trench, operation of the Temporary Holding Pond and Trench. Further work proposed as part of the 50,000 tonnes per annum (tpa) Lake Way SOP Demonstration Plant proposal is the subject of assessment by a separate works approval application.

2.1 Application details

Table 2 lists the documents submitted during the assessment process.

Table 2: Documents and information submitted during the assessment process

Document/information description	Date received
Applicant Works Approval application comprising: • 180025_SLP_Works_Approval_Application (Works Approval Application); and • 18020_Supplementary_Information (Works Approval Application – Supplementary Information).	19 December 2018
Applicant Licence application comprising: • SO4 Licence Application - W6202-2018-1 (Licence Application); • Attachment 2 Premise Map (Site Plan); and • Attachment 3A Works approval completion report W6202-2018-1 (Works Approval Completion Report).	4 June 2019
Applicant Works Approval (Lake Way SOP Demonstration Plant) application comprising: • 190026_SLP_WAA_Demo_Plant__Updated_for_Piper_Preston (Works Approval - Lake Way SOP Demonstration Plant Application) • 190805_DWER_Response_to_queries (Response to DWER Queries) • Att3 - BEC_aquatic invertebrate desktop_Lake	5 August 2019

Way_final2_11vi19 (Aquatic Invertebrate Review) • Att4 - Fauna_Memo_Report_Lake_Way (Fauna Assessment) • Att1 - Lake Way ASSI February 2019 Final (Acid Sulfate Soil Investigation) • Att2 - Piper Preston ASIC Listing (Salt Lake Potash Limited Corporate Structure)	

3. Background

The Premises is located on mining tenements M53/796 and M53/797, held by Kimba Resources, a wholly owned subsidiary of Blackham Resources Limited (BRL).

Lake Way has been a site of historical gold mining activity, with the Williamson Pit operating intermittently over the past twenty years. This pit is currently operated by BRL as part of its Matilda gold mining operations.

The Applicant has a legal agreement with BRL that allows for the extraction of potassium-bearing brines from groundwater from Kimba Resources' mining tenements via the dewatering of Williamson Pit prior to BRL mining it.

The Delegated Officer considers that the Applicant has legal tenure for the purpose and extent of this proposal.

The application is for a Category 14 Prescribed Premises as defined in Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) and listed in Table 3.

Table 3: Prescribed Premises Categories in the Existing Licence

Classification of Premises	Description	Premises production or design capacity or throughput
Category 14	Solar salt manufacturing: premises on which salt is produced by solar evaporation.	25,000 tonnes over project

4. Overview of Premises

4.1 Operational aspects

The Applicant proposes to pump up to 1.5GL of water from the Williamson Pit into a Temporary Holding Pond consisting of two ponds (Pond 1 and Pond 2) in series. Water in these temporary holding ponds will evaporate and result in a residual solid of potash salt. The Applicant anticipates up to 25,000 tonnes of potash will be generated over the project which is expected to be operational for a period of 12 months.

4.2 Infrastructure

The Premises infrastructure, as it relates to Category 14 activities, is detailed in Table 4 and with reference to the Site Plan (attached in the Issued Licence).

Table 4: Category 14 infrastructure

Ref	Infrastructure Prescribed Activity (Category 14)	Site Plan Reference
1	Temporary Holding Pond: consists of two ponds in series: • Pond 1: 500m long x 500 wide x 1m deep • Pond 2: 2,000m long x 500m wide x 2m deep	• Pond 1 • Pond 2

Ref	Infrastructure Prescribed Activity (Category 14)	Site Plan Reference
	High Density Polyethylene (HDPE) liner has been installed on the face of the Temporary Holding Pond embankment to reduce seepage. HDPE liner meets a permeability of 1 x 10-12 m/s. The base of the Temporary Holding Pond has been constructed of clay material that meets a permeability of 1 x 10-9 m/s.	
2	Trench: 2,000m long x between 4-8m deep (for collection of local groundwater and seepage from Temporary Holding Pond).	Conditioning Trench
3	Pipeline transferring dewater from Williamson Pit to Temporary Holding Pond (infrastructure located within Prescribed Boundary)	Pipeline

Figure 1: Site Plan

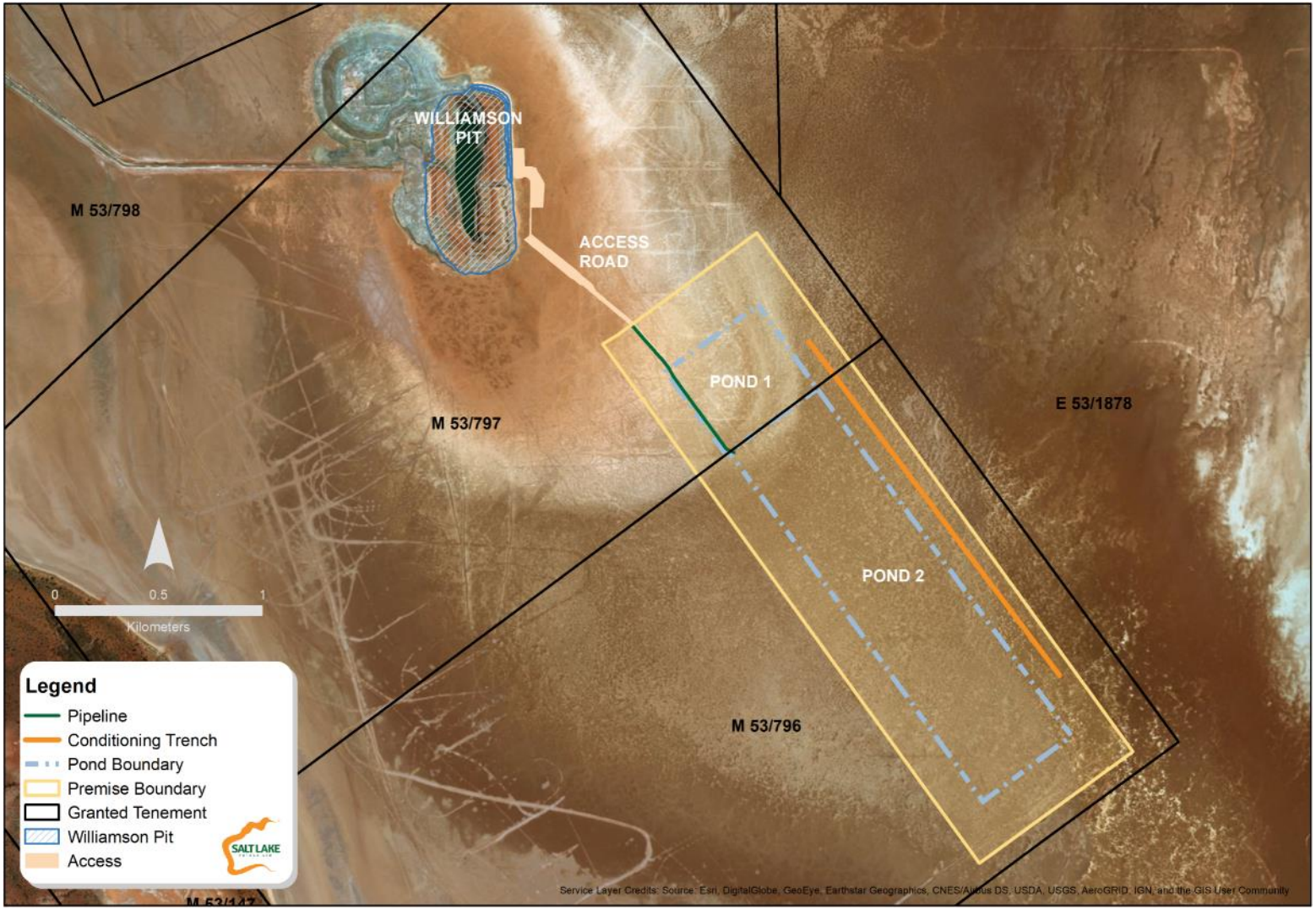

Image provided as part of Licence application supporting documentation

4.3 Exclusions to the Premises

The following are not included in this assessment:

- Further work proposed as part of the 50,000 tpa Lake Way SOP Demonstration Plant proposal, which is the subject of a separate works approval application.

5. Legislative context

Table 5 summarises approvals relevant to the assessment.

Table 5: Relevant approvals and tenure

Legislation	Number	Approval
Mining Act 1978	MP 7678	Mining Proposals managed by the Department of Mines, Industry Regulation and Safety (DMIRS). Approval granted to process up to 50,000 tpa.
Land Administration Act 1997	N/A	The Applicant has advised that the proposal does not require development/planning approval.
Rights in Water and Irrigation Act 1914	• GWL 182329; and • GWL 202044.	• GWL 182329 authorises the extraction of 1,115,00 kL from the East Murchinson, Meekatharra Palaeochannel and is granted to BRL. • GWL 202044 authorises the extraction of 300,000 kL from the East Murchinson, Meekatharra Palaeochannel (from the Trench) and is granted to the Applicant.
Country Areas Water Supply Act 1947	CAW 202043(1)	Authorisation to construct the Trench.

5.1 Part IV of the EP Act

5.1.1 Background

While the Lake Way SOP Demonstration Plant proposal was referred to the EPA, the Applicant's proposal to store a brine solution within the Temporary Holding Pond to undertake testing and analysis over a twelve month period is not subject to assessment under Part IV of the EP Act.

5.2 Part V of the EP Act

5.2.1 Applicable regulations, standards and guidelines

The overarching legislative framework of this assessment is the EP Act and EP Regulations. The guidance statements which inform this assessment are:

- *Guidance Statement: Regulatory Principles* (July 2015);
- *Guidance Statement: Risk Assessments* (February 2017); and
- *Guideline: Decision Making* (June 2019).

5.2.2 Works approval history

Issued Works Approval

The Applicant applied for a Works Approval in December 2018 to construct the following Category 14 infrastructure under of the *EP Regulations*:

- Temporary Holding Pond, consisting of two ponds (Pond 1 and Pond 2) in series:
    - Pond 1: 500m long x 500 wide x 2m deep; and

- Pond 2: 2,000m long x 500m wide x 2m deep.

Ponds constructed from clay material extracted from the Borrow Area which has been tested onsite to meet a permeability of 1 x 10^{-9} m/s.

- Roadways:
  - Access Road (for access between Temporary Holding Pond and the Williamson Pit); and
  - Borrow Pit Haul Road (for access to Borrow Pit for clay material extraction).
- Trench: 2,000m long and 4m deep (for collection of local groundwater and seepage) from Temporary Holding Pond).
- Pump within the Williamson Pit (for the purpose of extracting water from Williamson Pit into Pond 1).

DWER granted Works Approval W6206/2018/1 on 1 March 2019. Table 6 summarises the works approval history for the Premises.

Table 6: Works approval history

Instrument	Issued	Nature and extent of works approval
W6206/2018/1	1 March 2019	The Applicant was granted a Works Approval on 1 March 2019 to construct and install the following infrastructure: • Temporary Holding Pond, consisting of two ponds (Pond 1 and Pond 2) in series; • Access Road, between the Williamson Pit and Temporary Holding Pond; • Borrow Pit Haul Road, to access clay material; • Trench, which collects local groundwater and seepage (if any) from the Temporary Holding Pond; and • Pump within the Williamson Pit (for the purpose of extracting water from Williamson Pit into Pond 1).

Works Approval Completion Report

The Applicant submitted a Works Approval Completion Report to DWER on 4 June 2019.

The submitted Works Approval Completion Report identified the following departures from the Works Approval construction requirements:

- Temporary Holding Pond:
  - Pond 1 constructed to 500m long x 500m wide and 1m deep.
  - Pond 2 constructed to 2,000m long x 500m wide and 2m deep.
  - Due to the prolonged drying time required for clay, the Temporary Holding Pond embankments were constructed using mine waste material available from around the Williamson Pit area. Due to the higher permeability of the mine waste material and potential loss of brine, a decision was made to use HDPE liner on the face of the embankment to reduce seepage. HDPE liner meets a permeability of 1 x 10^{-12} m/s, which is lower than the permeability of the clay material (1 x 10^{-9} m/s) from the original design.
- Trench:
  - The original design for the Trench was to be approximately 2,000m long and 4m deep. The Trench is still within the construction phase. To date, 200m of Trench has been built with depths of up to 8m. The Trench depth has increased from 4m to 8m due to:

- The need to understand the impact to Trench ingress rates and Trench stability based on varying depths up to the maximum depth; and
- Optimising the use of existing plant and equipment onsite to complete construction to this depth.

It is expected that different depths will be trialled over the length of the Trench to optimise Trench design.

The departures listed above are not considered to have increased the risk to public health, amenity or the environment and as a result, DWER considers that all aspects of the Works Approval have been complied with and that a Licence can be granted.

6. Consultation

Stakeholder consultation undertaken at the Works Approval stage is detailed in Table 7.

Table 7: Stakeholder consultation

Method	Comments received	DWER response
Direct interest stakeholders notified (8/01/2019): DMIRS and Shire of Wiluna	DMIRS provided comment on 18/01/2019 to advise that "the project is considered to have low environmental risks due to the lack of environmental receptors and minor scale" and that as the project had been assessed under the *Mining Act 1978,* DMIRS had no specific comments or objections to the works approval application. No comments were provided by the Shire of Wiluna.	DMIRS comments were noted.
Application advertised on DWER website (14/01/2019)	None received.	N/A
Applicant notified of draft (28/02/2019)	Comments received 1/03/2019 requested waiver of the comment period.	Works Approval granted.

7. Location and siting

7.1 Siting context

The Premises is located approximately 30km south of the Town of Wiluna and situated within Lake Way.

7.2 Sensitive receptors

The distances to residential and environmental receptors are detailed in Table 8.

Table 8: Receptors and distance from activity boundary

Sensitive Receptors	Distance from Prescribed Activity
Residential Receptors	
Town of Wiluna	Located approximately 30km north of the Premises
Environmental Receptors	
Lake Way	Premises is situated within Lake Way
Surface geology	Soil type is SV5: Saline soils associated with salt lakes
Groundwater	Located 200 to 300mm bgl

8. Risk assessment

8.1 Determination of emission, pathway and receptor

In undertaking its risk assessment, DWER will identify all potential emissions pathways and potential receptors to establish whether there is a Risk Event which requires detailed risk assessment.

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. Where there is no actual or likely pathway and/or no receptor, the emission will be screened out and will not be considered as a Risk Event. In addition, where an emission has an actual or likely pathway and a receptor which may be adversely impacted, but that emission is regulated through other mechanisms such as Part IV of the EP Act, that emission will not be risk assessed further and will be screened out through Table 9.

The identification of the sources, pathways and receptors to determine Risk Events are set out in Table 9 below.

Table 9: Identification of emissions, pathway and receptors during operation

Risk Events						Continue to detailed risk assessment	Reasoning
Sources	**Activities**	**Potential emissions**	**Potential receptors**	**Potential pathway**	**Potential adverse impacts**		
Temporary Holding Pond and Pipeline transferring dewater	Dewatering activities and storage of hypersaline water	Discharges of hypersaline water through leaks, pipeline rupture or failure Seepage of hypersaline water through base or walls of Temporary Holding Pond Temporary Holding Pond bund wall failure and/or overflow of hypersaline water	Ecosystems adjacent to the Temporary Holding Pond and groundwater	Direct discharges to surface waters, land and infiltration to groundwater	Elevated salinity in underlying soils and groundwater	No	High Density Polyethylene (HDPE) liner has been installed on the face of the Temporary Holding Pond embankment to reduce seepage. HDPE liner meets a permeability of 1 x 10^{-12} m/s. The base of the Temporary Holding Pond has been constructed of clay material that meets a permeability of 1 x 10^{-9} m/s. All embankments have been designed by a certified engineer with experience in embankment construction. The Temporary Holding Pond will retain a 300mm freeboard. Daily inspections of the pipeline transferring dewater, discharge points, Temporary Holding Pond and embankment (including crest, toe and perimeter drainage) will be undertaken to identify any issues (e.g. leaks, spills, unusual changes). Special inspections will be undertaken immediately after heavy rains or any unusual events related to the Premises to ensure that the embankments and all infrastructure are functioning as required.

Risk Events						Continue to detailed risk assessment	Reasoning
Sources	**Activities**	**Potential emissions**	**Potential receptors**	**Potential pathway**	**Potential adverse impacts**		
							The project is located in an area where no vegetation occurs (salt lake). The Applicant controls appear sufficient at mitigating potential discharges of hypersaline water to surface waters, land and infiltration to groundwater.
Temporary Holding Pond and Trench	Storage of hypersaline water	No applicable	Livestock, birds and other fauna	Access to Temporary Holding Pond and Trench	Entrapment and potential drowning in Temporary Holding Pond and Trench Ingestion of hypersaline water	No	Daily inspections will be undertaken to ensure no fauna are trapped in the Trench or Temporary Holding Pond. Spoil from the Trench to be placed around the Trench to minimise access; Trench to have egress points. The Applicant supplied Works Approval Application – Supplementary Information states that all fauna deaths shall be reported to DMIRS in the annual report. Ingestion of water is not likely – related studies of birds accessing mine storage dams has determined that wildlife will not drink hypersaline water greater than 50,000 milligram per litre (mg/L) (TDS) (MERIWA, 2008). The Applicant controls appear to be sufficient at restricting fauna access to the area.

Risk Events						Continue to detailed risk assessment	Reasoning
Sources	**Activities**	**Potential emissions**	**Potential receptors**	**Potential pathway**	**Potential adverse impacts**		
Maintenance and servicing activities	Storage and use of hydrocarbons and chemicals	Leaks, spills and breach of containment	Ecosystems adjacent to the area of spill or breach	Spills to ground or leak, overflow during filling or leak from pipework	Soil, surface water and/or groundwater contamination as well as biota impacts	No	The Applicant supplied Works Approval Application – Supplementary Information states that: • All chemicals shall be stored in containments bunds, sea containers or chemical cabinets as appropriate for the volume and nature of the chemicals; • Double skinned fuel tanks will be used for pumping equipment; • Spill management equipment appropriate to the volume and type of hydrocarbons or chemicals being stored shall always be available; and • Appropriate maintenance on vehicles and machinery is to be carried out to minimise spillage. The Delegated Officer notes that the general provisions of the EP Act, UDRs, the *Dangerous Goods Safety Act 2004* and associated regulations are sufficient to regulate hydrocarbon and chemical emissions during operation. The Applicant controls appear sufficient at mitigating leaks, spills and breach of containment.

8.2 Consequence and likelihood of risk events

A risk rating will be determined for risk events in accordance with the risk rating matrix set out in Table 10 below.

Table 10: 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

DWER will undertake an assessment of the consequence and likelihood of the Risk Event in accordance with Table 11 below.

Table 11: 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	• **onsite impacts**: mid-level • **offsite impacts local scale**: low level • **offsite impacts wider scale**: minimal • Specific Consequence Criteria (for environment) are at risk of not being met	• **Adverse health effects:** low level or occasional medical treatment • Specific Consequence Criteria (for public health) are at risk of not being met • **Local scale impacts:** mid-level impact to amenity
Unlikely	The risk event will probably not occur in most circumstances	Minor	• **onsite impacts**: low level • **offsite impacts local scale**: minimal • **offsite impacts wider scale**: not detectable • Specific Consequence Criteria (for environment) likely to be met	• Specific Consequence Criteria (for public health) are likely to be met • **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 • 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.*

"onsite**"** means within the Prescribed Premises boundary.

9. Applicant's comments

The Applicant was provided with the draft Decision Report and draft issued *Licence* on 3 September 2019. The Applicant provided comments which are summarised, along with DWER's response, in Appendix 2.

10. Conclusion

This assessment of the risks of activities on the Premises has been undertaken with due consideration of a number of factors, including the documents and policies specified in this Decision Report (summarised in Appendix 1).

Based on this assessment, it has been determined that the Issued Licence will be granted subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

Timothy Gentle

MANAGER, RESOURCE INDUSTRIES

Delegated Officer
under section 20 of the *Environmental Protection Act 1986*

Appendix 1: Key documents

Item	Document title	In text ref	Availability
1.	Cyanide Ecotoxicity at Hypersaline Gold Operations, Report No. 273 (Executive Summary, Volume II – Phase II (Definitive Investigation)), Minerals and Energy Research Institute of Western Australia, August 2008	MERIWA, 2008	Accessed at: http://www.cyanidecode.org
2.	Pendragon (2019) Acid Sulfate Soil Investigation Lake Way Demonstration Plant Salt Lake Potash Ltd, March 2019	Pendragon 2019	DWER records (DWERDT186097)
3.	Salt Lake Potash (2019) Application for Licence submitted 4 June 2019	Application	DWER records (A1793985)
4.	Works Approval W6206/2018/1	Works Approval	Accessed at: www.dwer.wa.gov.au

Appendix 2: Summary of applicant's comments on risk assessment and draft conditions

Condition/Section Reference	Summary of Licence Holder comment	DWER response
Table 3: • Retain a 500mm freeboard in the Temporary Holding Pond	**Rhys Houlihan Comment:** Can this be changed to 300mm - this is due to the fact that the pond heights are low (1.5m); and 300mm is also sufficient to retain the Probable Maximum Precipitation (PMP) flood event.	Requested Licence amendment agreed, the Draft Licence has been updated accordingly.
Table 3: • Ensure the Trench is surrounded by spoil material (during both construction and operation activities) providing an active barrier to limit fauna access.	**Rhys Houlihan Comment:** Our current plan is to place breaks within the bunds to allow water flow. Change to the following: "spoil from the trench to be placed around the trench to minimise access; trenches to have egress points".	Requested Licence amendment agreed, the Draft Licence has been updated accordingly.
Table 4: • Twice daily (dawn and dusk) check to ensure no fauna are trapped either in the Trench or Holding Ponds	**Rhys Houlihan Comment:** Our preference is to commit to daily inspections. In consultation with our fauna consultants (Bamford) there is limited fauna on the lake itself, and therefore the risk to fauna species is low.	Requested Licence amendment agreed, the Draft Licence has been updated accordingly.

Condition/Section Reference	Summary of Licence Holder comment	DWER response
Table 4 and Table 7: • Trench and spoil embankment	**Rhys Houlihan Comment:** Our position is that the trenches don't need to be included as the solar salt manufacturing is for the ponds only; the trenches and the environmental management of these is covered under the Mining Proposal and Part V of the Act.	The Trench falls within the Prescribed Premises boundary and is considered to be 'associated infrastructure' for the Category 14 activity. DWER therefore determines the Trench to be included in the Licence.
Table 4 and Table 7: • Dewatering pump operations	**Rhys Houlihan Comment:** These sit outside of the footprint and should be removed as conditions.	Requested Licence amendment agreed, the Draft Licence has been updated accordingly.
Table 4 and Table 7: • Pipeline transferring dewater and discharge points	**Rhys Houlihan Comment:** These sit outside of the footprint and should be removed as conditions.	Some components of the Pipeline transferring dewater and discharge points fall within the Prescribed Premises boundary and are considered to be 'associated infrastructure' for the Category 14 activity. DWER therefore determines the Pipeline transferring dewater and discharge points to be included in the Licence.

Attachment 1: Licence L9208/2019/1