



Application for Works Approval Transfer

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

Works Approval Number W6455/2020/2

Applicant Butcherbird Operations Pty Ltd

ACN 684 395 748

DWER number INS-0002395

Application number APP-0030170

Premises Butcherbird Manganese Project – Stage 1

Legal description
Mining tenement M52/1074
As defined by the Premises maps attached to the issued works approval

Date of Report 7 November 2025

Decision Works approval granted

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1. Decision summary

The Delegated Officer has determined to transfer Works Approval W6455/2020/2 from the existing works approval holder, Element 25 Limited to Butcherbird Operations Pty Ltd. This transfer is administrative in nature therefore does not alter the risk profile of the Premises, providing those activities, emissions and receptors as stated in existing approvals, remain unchanged.

The decision report for the existing Works Approval W6455/2020/1 will remain on the department's website for future reference and will act as a record of the department's decision making.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Decision 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

Works Approval W6455/2020/1 is held by Element 25 Limited (Works Approval Holder) for the Butcherbird Manganese Project – Stage 1 (the Premises), located within Mining tenement M52/1074, Meekatharra, Western Australia.

The works approval is for the construction and commissioning of a category 5 processing or beneficiation of metallic or non-metallic ore under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations).

On 1 August 2025, an application was submitted to the department for a transfer of works approval W6455/2020/1 under section 61 of the *Environmental Protection Act 1986* (EP Act). The transfer application is limited to changing the Works Approval Holder's name from Element 25 Limited to Butcherbird Operations Pty Ltd, the Australian Company Number (ACN) from 119 711 929 to 684 395 748 and the registered business address from Level 2, 45 Richardson Street, West Perth WA 6005 to Level 1, Building B, Garden Office Park, Osbourne Park WA 6017.

There are no proposed changes to the current approved premises categories or design capacity.

3. Assessment

The assessment of transfer application requires the determination of whether the new occupier meets the department's fitness and competency requirements. The applicant must provide documentary evidence of the date they became occupier of the premises.

Legal occupancy and entity status

The application states that Butcherbird Operations Pty Ltd was registered as a company under the *Corporations Act 2001* on 11 February 2025. A copy of the Certificate of Registration of a Company was provided to DWER with the application. A company extract provided in the application shows that Butcherbird Operations Pty Ltd is a fully owned subsidiary of Element 25 Limited.

Butcherbird Operations Pty Ltd is a registered company with a valid and current entry on the Australian & Investments Commission register (ACN 684 395 748) and is therefore a legal entity.

Fitness and competency

The applicant advises it has not been convicted or paid a penalty for an offence under a provision of the EP Act or its subsidiary legislation or similar environmental protection legislation in Australia.

4. Conclusion

The Delegated Officer has determined to transfer works approval W6455/2020/2 to Butcherbird Operations Pty Ltd on the grounds it is a current legal entity with legal access to the premises and has no known convictions.

4.1 Summary of transfer

Table 1 below provides a summary of the changes made to the existing works approval as part of this transfer and will act as a record of implemented changes. All proposed changes have been incorporated into the transferred works approval as part of the transfer process.

Table 1: Summary of licence changes

Condition number	Proposed changes
Instrument version number	W6455/2020/1 changed to W6455/2020/2
Cover page	- Works approval holder's name amended to <i>Butcherbird Operations Pty Ltd</i> - ACN amended to <i>684 395 748</i> - Registered business address amended to <i>Level 1, Building B, Garden Office Park, Osbourne Park WA 6017</i>
Definitions: Table 10	Amendment of the numbering for a table from <i>Table 1</i> to <i>Table 10</i> . This change is due to a typographic error in the original works approval and is an administrative change only.