

Statement of Reasons

Grant of mining licence MIN008642 to WIM Resource Pty Ltd

Decision and scope

1. On 6 October 2026, I, Daniel Thompson, Director, Statutory Authorisations, Regulatory Operations, Resources Victoria, acting as delegate of the Minister for Energy and Resources under instrument of delegation dated 12 June 2025, decided under sections 25 and 26 of the Mineral Resources (Sustainable Development) Act 1990 (the Act) to grant mining licence MIN008642 to WIM Resource Pty Ltd (WIM) to enable the Avonbank Mineral Sands Project (the Project).
2. I granted the licence for 20 years from registration over a net area of 3,408.77 hectares shown on the grant map, subject to the conditions in the Instrument of Grant. I decided under section 14(4) that an area greater than 260 hectares may be required to mine the mineral resource. The area granted is smaller than the area originally proposed, following the agreed memorial-site excision. I did not grant the requested 38-year term.
3. The principal reasons for my decision are that WIM meets the statutory requirements including those relating to whether WIM is fit and proper, intends to comply with the Act and to do the work, has an appropriate program of work and likely financial capability; that the resource has a reasonable prospect of being mined economically; and the environmental and social risks raised in objections can be addressed through the modified proposal, licence conditions and applicable statutory controls. I gave particular consideration to submissions regarding agricultural productivity, rehabilitation uncertainty, affected households and Traditional Owner interests when deciding whether or not to grant the licence. My detailed reasons for reaching this conclusion, including my consideration of material adverse to the grant, are set out below.
4. The licence establishes mineral tenure. It does not approve the proposed work plan, determine compensation, authorise road closures or itself permit the proposed mining operations to commence. Those activities remain subject to applicable approvals and commencement requirements. Nevertheless, I considered the reasonably foreseeable consequences of enabling the project through this grant. I did not treat the existence of later approval processes as removing the need to address those consequences in this decision.

Application and material considered

5. WIM applied for a mining licence on 13 February 2025. Resources Victoria accepted and ranked the application on 7 March 2025. The proposal concerns a mineral sands deposit near Dooen and Jung, northeast of Horsham, containing zircon, titanium-bearing minerals and minor rare earth products. The land includes private properties and Crown land, including road reserves.
6. The proposed mine would operate progressively across four mining blocks. The Program of Work Summary describes a mining footprint of approximately 2,169 hectares, with disturbance within the licence area expected to remain below 340 hectares at any one time. The proposal involves excavation, primary processing, return of tailings and overburden to mined areas, and progressive rehabilitation. The wider project also includes processing and infrastructure outside the mining licence area, including the WIM Base Area.
7. In making my decision, I considered the decision brief and its supporting documents and assessments. Where the brief summarised other records, I relied on those summaries. These reasons identify the evidence supporting my findings, including relevant specialist assessments. The findings and statutory judgement are my own.
8. I also considered the objections and comments, including the issues identified in Resources Victoria's assessment and the separate assessment of objection OBJ-005454 concerning rehabilitation of the Banyena test pit. I considered the Minister for Planning's assessment of the Environment Effects Statement (EES), dated 8 November 2024, together with relevant subsequent information.

Statutory framework and application process

9. Sections 25 and 26 of the Act provide for the grant or refusal of the licence, including grant over a smaller area and the imposition of conditions. Compliance with application requirements does not compel grant: section 25(3) preserves the discretion to refuse. I considered whether the application should be granted in the form proposed, granted with a different area, term or conditions, or refused.
10. Section 15(6) requires WIM to satisfy me that it is a fit and proper person, intends to comply with the Act, genuinely intends to do work, has an appropriate program of work, and is likely to be able to finance the proposed work and rehabilitation. Section 16 specifies matters relevant to suitability as a fit and proper person. Section 15(6B) requires satisfaction that there is a reasonable prospect of economically viable mining. Section 15(6C) requires consideration of the mineralisation report. The resource description is also subject to the Ministerial Guidelines under section 15(1BB). My consideration of those matters is explained in the following sections.
11. Section 25(2) requires that I consider objections and comments received under Sections 24 and 24A. I considered these comments and objections, the principles in section 2A and the Minister for Planning's environmental assessment. I also considered the relevant native title and Traditional Owner settlement arrangements, biodiversity, climate change and human rights. My consideration of those matters is explained in the following sections.
12. Resources Victoria's detailed assessment of section 15(6) requirements records that land-availability checks were undertaken. WIM held RL2014 when it applied over the overlapping land, engaging section 15(1A)(c)(i). On registration, section 26(10) removes from RL2014 only land then covered by both licences. The effect on any remaining retention-licence land depends on that licence's status.
13. Section 15(5) and regulations 22 and 23 of the *Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2019* (the Regulations) govern advertising and notice to affected owners and occupiers. The application was advertised in The Weekly Advertiser and The Weekly Times on 19 March 2025 and was also listed on Resources Victoria's website. WIM's website contains information on the Project including information about the mining licence application.
14. On 7 March 2025, Resources Victoria consulted with the Crown land Minister under section 15(5A) in relation to the mining licence application. On 28 March 2025, the Minister's delegate advised there was no objection to the mining licence application. Accordingly, no conditions were recommended.

The mineral resource and prospects for viable mining

15. I considered the mineralisation report, the Geological Survey of Victoria (GSV) assessment and the independent technical review by Environmental Resources Management Australia Pty Ltd (ERM). The mineralisation report describes a mineral resource in accordance with the Ministerial Guidelines per section 15(1BB) of the Act. The material describes a large, shallow and laterally extensive mineral sands deposit. Its geometry supports staged open-pit mining using established methods. The reported mineral resource is approximately 490 million tonnes at 4.0% total heavy minerals and includes Measured and Indicated Resources. These classifications provide a stronger basis for mine planning than reliance solely on preliminary exploration results.
16. The updated 2025 Ore Reserve estimate is approximately 284.0 million tonnes. ERM's review distinguishes that estimate from the 2018 estimate of 311.8 million tonnes, a reduction of approximately 9% following design changes arising from the environmental assessment. I have not treated the older reserve figure as the current estimate. ERM's completed review supports the report's compliance with the relevant technical requirements, following provision of further information.
17. The Definitive Feasibility Study and associated technical work address mining, processing, infrastructure, logistics, capital and operating costs, product characteristics and markets. The conversion of part of the resource into an Ore Reserve, supported by feasibility work and the application of relevant modifying factors, provides evidence of a resource capable of economic extraction. It does not guarantee the forecast production, prices or returns.
18. I also considered the more recent project financial analysis summarised by Scyne Advisory (Scyne). It identifies positive modelled returns across the scenarios assessed, while recognising sensitivity to mineral prices, exchange rates, construction costs and other assumptions. I give weight to the combination of defined mineralisation, mine design, processing test work, identified markets and specialist review. I do not rely on a single historical financial indicator or assume that forecasts remove commercial risk.

19. On that evidence, I am satisfied under section 15(6B) that there is a reasonable prospect that mining the mineral resource described in the application will be economically viable. I have considered the mineralisation report itself and the identified assessments for the purposes of section 15(6C). This finding concerns the prospects of the resource being mined economically; the separate question of WIM's likely ability to finance the work and rehabilitation is addressed below.

WIM's suitability, intention and capability

Suitability to hold the licence

20. I considered the detailed section 15(6) assessment, the Fit and Proper Questionnaire, Compliance Declaration, Australian Securities and Investments Commission (ASIC) company report, ASIC banned and disqualified, and bankruptcy searches as well as various (national and international) police checks and WIM's response concerning its suitability. I applied section 16 and considered Resources Victoria's *Fit and Proper Person Policy*. The section 15(6) assessment records no relevant convictions identified by the checks, no licence cancellation and no rehabilitation action under section 83 affecting WIM or its associates. WIM declares no insolvency, administration, disqualification from company management for it or its associates. This supports the finding that the insolvency bar in section 16(2) does not apply.
21. WIM has previously failed to submit required expenditure and activities returns and annual technical reports for RL006195, RL006571 and RL2014. These failures affected its eligibility for section 38A waivers for two exploration licences. I also noted, however, that WIM has subsequently lodged the relevant returns and reports. I considered these matters relevant to WIM's diligence, reliability and cooperation with the regulator.
22. I also considered allegations concerning the integrity of submissions in the environmental assessment process. A WIM stakeholder liaison officer was charged on 29 July 2025 with making false documents concerning three submissions. The charges were withdrawn on 17 February 2026. The charges do not establish that the alleged conduct occurred, and their withdrawal does not establish that every concern about the conduct is unfounded. I considered the underlying concerns as part of the suitability assessment.
23. Having had regard to the above matters, I do not consider that there is sufficient evidence of dishonesty, incapacity, insolvency, persistent regulatory defiance or conduct incompatible with responsible licence management that would warrant a finding that WIM is not a fit and proper person to hold this licence. The Compliance Declaration reports no outstanding reports, rent or royalties and no unapproved work or non-compliance with a notice or direction. The detailed assessment identifies no relevant convictions or statutory disqualification and recommends a favourable finding after considering the adverse matters. Taking that evidence together, I am satisfied that WIM is a fit and proper person to hold this licence. The additional engagement reporting requirement responds to continuing concerns about accountability; it is not a substitute for reaching that state of satisfaction.

Intention to comply with the Act

24. For section 15(6)(b), I considered past reporting failures and transparency concerns as a potential indicator of future intention. I also considered the assessment's record of no failures to pay rent or royalties, lodge a requested bond or rehabilitate a site, the Compliance Declaration, and WIM's provision of further information in response to my requests and progression of regulatory approvals.
25. WIM has provided the outstanding historical returns. I also give weight to its responsiveness to multiple requests for further information throughout the licence assessment as evidence of its willingness to cooperate with the regulator. In its October 2025 response to my September 2025 request for further information, WIM reported updating its Corporate Code of Conduct and delivering company-wide training. It committed to stronger Board oversight, independent compliance advice and regular audits, and acknowledged the need to rebuild community trust through open communication, dedicated community leadership and greater participation in rehabilitation activities.
26. Having weighed that evidence, I am satisfied that WIM intends to comply with the Act. I reach that conclusion on the evidence of its present conduct and response to regulatory requirements.

Genuine intention and an appropriate program of work

27. WIM has progressed the project through preparation of the EES, participation in the inquiry and assessment process, technical and financial studies, and the preparation of a staged program of work. Its request of 7 July 2025 for planning scheme amendment C84hors seeks approval for the WIM Base Area outside the mining

licence. The request records changes responding to agency and community submissions. These are substantive steps directed to developing the project and support my satisfaction under section 15(6)(ba) that WIM genuinely intends to do work.

28. The work program is tailored to the deposit and proposed mine. It describes four mining blocks, sequential excavation, processing and materials handling, backfilling and progressive rehabilitation, with construction and decommissioning stages. This sequencing limits the area disturbed at one time and connects resource extraction with the proposed return of land to productive use. GSV reviewed the program on 5 December 2025 and found it appropriate. I give weight to that technical assessment and to the program's explanation of how work would occur at this site.
29. The program extends beyond the initial term granted. It nevertheless identifies the work proposed during that term and places it within the project's longer development sequence. Work beyond the initial term requires renewal and applicable approvals. My finding that the program is appropriate under section 15(6)(c) does not approve a detailed work plan or establish that the proposed rehabilitation methods will achieve every intended outcome.

Ability to finance work and rehabilitation

30. Scyne's Project Specific Analysis Part B, dated 18 December 2025, considers WIM's financial model, proposed debt and equity funding, investor interest and engagement with potential financiers and offtake partners. It refers to Scyne's earlier Part A assessment of WIM's historical financial position. It finds that WIM does not presently control all funds needed to deliver the proposed work. I have therefore not treated letters of intent as secured finance or described the project as fully funded.
31. The evidence nevertheless identifies a financing pathway supported by project-specific engagement and modelled returns. Scyne considers the stage of financier engagement consistent with a project of this scale seeking its principal approvals. The report's cash evidence relates to June 2025 and its financing assessment to December 2025; time-sensitive financial information was provided in September 2026. Its analysis also identifies residual risks: financiers may require further verification of construction costs, commodity prices and other assumptions before committing. Comparable financing transactions indicate a market for projects of this type, but do not establish that Avonbank will obtain finance.
32. Rehabilitation funding is part of that assessment. The Applicant's proposed bond estimate is lower than the department's estimate. Scyne reports that the model remains positive using either estimate, but funding the required bond remains dependent on raising project finance. I give weight to the analysis using the department's higher estimate and do not adopt the Applicant's estimate as the bond to be required. A positive modelled return and provision of a bond also do not relieve WIM of its full rehabilitation obligations.
33. I recognise the distinction between a credible prospect of securing finance and certainty that it will be obtained. Having considered the identified funding risks, the specialist analysis, evidence of investor and financier engagement and project economics, I am satisfied that WIM is likely to be able to finance the proposed work and rehabilitation for section 15(6)(d). For the avoidance of doubt, I do not regard mere investor interest as sufficient. My satisfaction arises from the combination of project economics, identified debt and equity pathways, existing investor engagement and Scyne's assessment that the financing strategy is consistent with projects at this stage of development.
34. The Commonwealth Treasurer's conditional no-objection notification concerns the proposed foreign acquisition of an interest in MIN008642. I considered it as part of the regulatory position concerning the investment. I have not treated it as a guarantee of funding or as a substitute for my assessment of WIM's financial capability.

Objections, environmental effects and community concerns

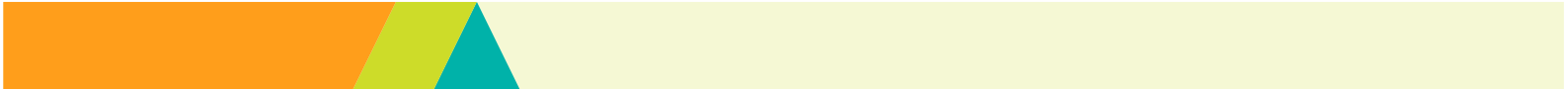
Approach to the submissions and environmental assessment

35. The final Objections and Comments Summary contains 828 distinct tracking entries. It identifies 79 as duplicates and 41 as blank, with four carrying both flags. These are administrative records of received correspondence, not a count of 828 independent substantive objections. I considered the substantive issues identified in the objections and comments assessment, including views supporting the project. I did not determine the application by counting submissions for and against it.
36. On 8 November 2024, the Minister for Planning concluded that the project's environmental effects were generally acceptable if the project was modified and the environmental management measures were refined and implemented consistently with her assessment. I give substantial weight to that assessment because it followed

- technical studies, submissions and an inquiry testing competing evidence. Its conclusion is conditional. I have not treated it as an unconditional endorsement of the original proposal or as determining this licence application.
37. The following findings address the recurring concerns in the licence submissions, drawing on the environmental assessment and subsequent material. They also explain why I imposed the safeguards discussed in section 9.
38. Objectors question whether productive agricultural land can be restored after excavation, soil stockpiling and reconstruction. I regard this as a central issue. Loss of soil structure or crop productivity could affect livelihoods and the capacity of future landholders to use the land, extending beyond the period of mining or the licence term.
39. Section 5.10 of the Minister for Planning's assessment examines the soil characteristics, competing expert evidence and limitations of the demonstration trial. It supports detailed pre-mining assessment, segregation of soil materials, stockpile inventories, erosion control, appropriate amelioration, rehabilitation research and monitoring. The assessment accepts the potential to manage soil effects to acceptable levels through those measures. It does not establish that successful rehabilitation has already occurred across the proposed mine.
40. The later material concerning objection OBJ-005454 questions rehabilitation performance at the Banyena test pit. The internal assessment records Dr John Russell's analysis of soil samples and crop-yield information, including reported yield reductions of 30% for the 2023 soybean crop and 20% for the 2024 canola crop over the former pit. These are attributed findings, not independent departmental measurements. The evidence is material because it challenges reliance on the trial as proof of successful restoration.
41. I give that evidence weight and do not rely on the demonstration trial as establishing that pre-mining productivity will necessarily be restored. Conditions 5 and 6 require site-specific soil and agricultural baselines to inform performance standards and rehabilitation criteria, including crop yield. Those requirements help establish what must be achieved and how performance can be assessed. They do not themselves prove that the required outcomes can be achieved.
42. I also consider that the proposed mining technique supports progressive rehabilitation. The staged excavation, backfilling and replacement of soil allow rehabilitation to proceed as mining advances, limiting the area disturbed at any one time and providing opportunities to assess performance and improve methods during operations. This supports confidence in the proposed approach, together with the Minister for Planning's conditional findings in section 5.10 of her assessment concerning soil management and rehabilitation.
43. I also note the work of the independent [Mineral Sands Agricultural Land Restoration Working Group](#), which advises Resources Victoria on restoring agricultural land to its pre-mining productivity. Its discussions, including contributions from Dr Russell, emphasise independent field trials, transparent evidence, agricultural baselines and monitoring over multiple seasons and crop rotations. That work may inform rehabilitation practice and regulatory guidance. It does not establish the adequacy of this project's rehabilitation methods or replace project-specific assessment.
44. While the available evidence does not establish that pre-mining productivity will necessarily be restored, neither does it establish that restoration cannot be achieved. The evidence before me demonstrates a plausible rehabilitation pathway supported by recognised soil-management measures, progressive rehabilitation techniques and further approval processes requiring demonstration of satisfactory rehabilitation outcomes before mining may proceed, and the enforceable requirements for soil surveys and agricultural baseline assessments under conditions 5 and 6. These provide a basis for setting and assessing rehabilitation performance standards, while the detailed rehabilitation arrangements remain subject to work plan assessment before mining commences. I have considered the Banyena evidence as a material qualification to confidence in rehabilitation outcomes. I do not regard it as requiring refusal of mineral tenure, but it must inform that further assessment and the measures needed to address soil structure and agricultural productivity.
45. Sections 26A–D set out requirements and a process for considering the relative benefits of mining agricultural land not owned by WIM. Sections 26A–D apply *after* the grant of a licence and do not therefore form considerations relevant to the grant of a licence. Section 26A requires a statement of economic significance addressing benefits to Victoria, including how those benefits would change if mining could not occur on each separately owned or occupied agricultural property. For mining under the initial work plan, the statement must be provided by the earlier of six months after notification of grant and lodgement of that work plan. Affected owners and occupiers may then seek excision in accordance with the Act. I have not used that future process to defer consideration of the present agricultural concerns or to pre-judge an excision application.

Dust, radiation and health concerns

46. Submissions raise concerns about inhaled dust, radiation, contamination of crops and household rainwater, and associated health effects. I considered those exposure pathways, including their significance for nearby



households, rather than treating concern about health as a general objection to mining. Sections 5.6–5.8 of the environmental assessment examine air quality, radiation and human health and support management measures and monitoring to test the predicted effects.

47. I also considered WIM's written commitment to Horsham Rural City Council dated 24 July 2026 that heavy mineral concentrate (HMC) stockpiles will be covered. This responds directly to concerns about airborne particles and provides an additional measure to reduce potential dust emissions at their source. I give weight to this commitment as part of the proposed operational controls, while recognising that its detailed implementation must be addressed through the applicable management plans and approvals.
48. I accept the conditional findings of the Minister for Planning's environment effects assessment as a basis for grant, while recognising the need to verify predictions during operation. Conditions 4 and 9 require baseline and ongoing monitoring relevant to crops, rainwater and airborne radionuclides, with responses to changing risk and the radiation approval framework. These requirements address the uncertainty underlying the concerns by requiring evidence of actual conditions and an adaptive response.

Water availability and quality

49. Concerns include project demand for water and the risk of changes to groundwater, surface water and water quality. Section 5.2 of the environmental assessment provides the technical basis for considering these effects. Condition 8 requires ongoing review of water-related risks and updates to the groundwater impact assessment when monitoring or modelling indicates increased risks, and otherwise at five-year intervals.
50. I have considered the surface water and groundwater findings in section 5.2 of the Minister for Planning's assessment. I give weight to condition 8, which requires adaptive management of water-related risks and an updated groundwater impact assessment when monitoring or modelling indicates increased risks, and otherwise every five years. The Schedule of Conditions also requires erosion and sediment controls and reasonable measures to prevent contaminated runoff entering waterways. Together, these requirements provide for preventive controls and the review of risks as mining and rehabilitation progress. On that basis, I consider the identified water concerns can be managed without refusing the licence. The grant does not confer a water entitlement or approve water abstraction, waterway works or tailings disposal; any separate approvals required for those activities remain to be determined.

Biodiversity and changes to mine design

51. I accept the Minister for Planning's finding in section 5.1 that the proposed loss of native grassland within Greenhills Road reserve would be unacceptable. Retention of that reserve and its significant native vegetation is a substantive modification underpinning my decision. The agreed exclusion of the native vegetation adjoining the Johns family memorial from the disturbance footprint provides a further avoidance measure.
52. Avoiding the reserve may change mine layout or sequencing and create different noise, dust or other effects. Condition 7 requires any new or increased impacts arising from those changes to be discussed with the Environment Protection Authority and other relevant statutory authorities, and requires the changes to address the general environmental duty. It does not itself prohibit clearing the reserve. The Schedule of Conditions prohibits opening areas for mining and ancillary operations except as approved in the work plan, requires compliance with that plan and prohibits excavation or vegetation removal, other than noxious weeds, within its buffer zones. Those controls provide the means to implement the avoidance requirement through the work plan.

Traffic noise, access and affected households

53. I considered concerns about road closures, traffic safety, noise, loss of amenity, displacement and disruption to farming families. Sections 5.3–5.5 and 5.9 of the environmental assessment examine these effects. Although some effects can be reduced through operating controls, access arrangements and support, displacement and disruption to established homes and businesses may be substantial and enduring. Compensation cannot be assumed to remove those effects.
54. The memorial-site excision and disturbance exclusions protect identified features that cannot readily be replaced elsewhere. Condition 3 maintains road access to the property and memorial area on Max Johns Road under an agreed protocol, including emergency access. These are targeted responses to the site-specific concern and do not establish that every other access or household issue has been resolved.
55. The Community Engagement Plan provides for direct engagement with affected landholders, rehabilitation discussions, environmental monitoring summaries and an Environmental Reference Group. It also provides for a Wellbeing Plan and access to support for displaced landholders and their families. Its complaints process and

records provide a means of identifying effects and responding to them. Condition 2 adds reporting to Resources Victoria on engagement and action taken. I give these measures weight as mechanisms for response and accountability, rather than as evidence that all affected people support the project.

Economic benefits and concerns about project integrity

56. Supportive submissions identify employment, local procurement and regional development opportunities. Other submissions question the scale or distribution of benefits and the costs to agriculture, households and services. I give weight to the prospect of regional benefits, supported by the project and financial assessments, but do not treat forecast benefits as guaranteed or assume that those bearing the greatest impacts will receive corresponding benefits.
57. Concerns about WIM's conduct, the integrity of information and financial capability inform my findings in sections 4 and 5. Independent technical review and financial scrutiny provide evidence additional to WIM's own assertions. They do not remove the need to consider limitations or contrary evidence. The withdrawal of criminal charges does not determine the merits of the project or eliminate the need for community accountability.

Area of the licence

58. Section 14(4) ordinarily limits the licence area to 260 hectares unless I decide a greater area may be required to mine a mineral resource. I find that the deposit's extent, the four-block mining sequence and the land needed for associated operations support a larger area. A 260-hectare licence would not accommodate the described resource extraction sequence and associated operating areas. The fact that a smaller area is disturbed at one time does not remove the need for tenure over the land into which mining would progressively move.
59. The final grant map, checked on 3 November 2025, records a total area of 3,426 hectares and a net licensed area of 3,408.77 hectares, with the excised area shown separately. The licence boundary and the disturbance footprint serve different purposes. WIM's Johns Property Exclusion Area report of October 2025 confirms that the residence, memorial and adjoining Black Box–Lignum vegetation are excluded from the disturbance footprint, with a buffer of at least 30 metres between the memorial and disturbance. WIM states that the exclusion is incorporated into its mine design and financial model, affects around 1% of the reserve and does not compromise viability or the project schedule. This supports a targeted exclusion while retaining the wider area required for mining. The disturbance exclusion is to be reflected in the work plan; the tenure excision is the area shown on the grant map.
60. I decide that the net area of 3,408.77 hectares may be required to mine the mineral resource. Securing the necessary operating area may also support investment, but that is supplementary to the resource and operational reasons. I have not treated investor confidence alone as a reason to exceed the statutory area.

Term of the licence

61. WIM sought a 38-year term and described mining and decommissioning extending beyond year 20. Under section 14(3)(a), the ordinary maximum term is 20 years unless the Minister decides otherwise. I considered the longer schedule but found no evidence establishing that the project's feasibility depends on an initial term exceeding 20 years.
62. I therefore grant a 20-year term. Sections 14(3)(b) and 29 permit an application for renewal, subject to the requirements in section 31. That provides a lawful pathway for activities beyond the initial term, without committing now to a further term. Renewal provides a future opportunity to assess compliance, progress and the requirements then applicable, and an incentive to progress work in accordance with the licence.
63. The shorter term does not guarantee that all disturbance or rehabilitation will end within 20 years. I considered the longer project lifecycle when assessing foreseeable effects. My decisions about area and term address different questions: the resource and mining method establish the spatial requirement, while the evidence does not establish a corresponding need for a 38-year initial term.

Reasons for non-standard licence conditions

64. I imposed the conditions in the Instrument of Grant under section 26(2) in response to risks identified through assessment of the proposed activities, the Minister for Planning's environmental assessment and concerns raised in submissions. The conditions establish enforceable requirements for expenditure, community engagement reporting, access, soil and agricultural baseline assessments, environmental monitoring and management, and steps towards an agreement with BGLC. The following paragraphs explain how these

requirements respond to the identified risks and concerns. Their operative wording is set out in the Instrument of Grant.

65. Condition 1 requires annual expenditure of \$3,067,893, subject to the Act's mechanisms for variation or suspension. It establishes an obligation to progress work within the licensed area.
66. Conditions 2 and 3 address engagement and access. Quarterly engagement reporting enables Resources Victoria to examine activities undertaken, concerns received and the actions taken in response. It adds oversight to the continuing consultation duty and responds to concerns about responsiveness and transparency raised in objections. The access condition specifically protects continuing access to the Max Johns Road property and memorial, including emergency services access.
67. Conditions 4 and 9 respond to the EES findings concerning potential exposure to metals and radionuclides through airborne dust, crops and rainwater used for drinking. Condition 4 requires baseline crop and rainwater monitoring before work commences and ongoing monitoring during operation and closure. Condition 9 specifies biannual airborne particulate sampling for radionuclide analysis and requires radiation monitoring in accordance with the Department of Health's Radiation Management Licence and approved Radiation Management Plan, with adaptive, risk-based frequency. The monitoring will provide measured data to test the assessment's predictions and identify changes in risk requiring management responses. Publication of crop and rainwater monitoring data, with landholder consent, supports transparency while respecting landholders' interests.
68. Conditions 5 and 6 require soil surveys and agricultural baseline assessments before the specified disturbance. They reflect environmental management measures SL-02 and SL-12 and respond directly to concerns about the loss of productive soils. Their purpose is to establish site-specific information for soil handling, rehabilitation standards and assessment of outcomes, including yield. They complement, rather than replace, a satisfactory rehabilitation plan and financial assurance.
69. Condition 7 reflects environmental management measure SL-14 and addresses potential consequences of changing the mine layout or sequence to retain Greenhills Road reserve. Those changes could increase noise, dust or other environmental impacts. The condition requires the changes to address the general environmental duty and requires any new or increased impacts compared with those assessed in the EES to be discussed with the Environment Protection Authority and other relevant statutory authorities. Its purpose is to ensure that changes made to protect biodiversity also achieve acceptable outcomes for other environmental impacts. Section 6 explains how retention of the reserve is to be implemented through the work plan controls.
70. Condition 8 responds to the findings in section 5.2 of the Minister for Planning's assessment, which support using monitoring results to review groundwater predictions and inform management responses as mining progresses. It also addresses concerns raised in submissions about effects on surface water and groundwater. The condition requires adaptive management during mining and rehabilitation and an updated groundwater impact assessment when monitoring or modelling indicates increased risks to human health or the environment, and otherwise every five years.
71. Condition 10 addresses agreement-making with Barengi Gadjin Land Council Aboriginal Corporation concerning Crown land. Its purpose and the timing issue it addresses are explained in section 10.
72. The additional conditions operate alongside the Schedule of Conditions and statutory requirements governing work, rehabilitation and compliance. In deciding to grant the licence, I considered the environmental effects identified in the Minister for Planning's assessment and the measures recommended to address them. The licence conditions give effect to specified recommendations where I deemed the mining licence was the appropriate mechanism. Other recommendations, including changes to the mine layout and sequence, are to be addressed through the detailed work plan, supporting management plans and relevant separate approvals. Granting the licence does not approve those plans or determine those separate applications.

Native Title and Traditional Owner interests

73. I considered Resources Victoria's advice that no native title procedural rights apply to the proposed grant over the Crown land parcels and the requirement in section 5A of the Act that any action taken under this Act must be taken in a way that is not inconsistent with the *Native Title Act 1993* (Cth).
74. I considered the Land Use Activity Agreement (LUAA) executed on 16 April 2026 between the State and Barengi Gadjin Land Council Aboriginal Corporation (BGLC), representing the Wotjobaluk, Jaadwa, Jadawadjali, Wergaia and Jupagulk People. It provides a framework under the Traditional Owner Settlement Act 2010 for activities on agreement land, including commercial mining.

75. The grant of the licence will precede commencement of the LUAA. I have therefore considered the application on the basis that the LUAA is not yet operative.
76. I imposed condition 10 to require WIM, before any mining activities commence within the licence area, to take all reasonably practicable steps to enter into an agreement with BGLC relating to Crown land within the licence area, consistent with the *Traditional Owner Settlement Act 2010* and to the satisfaction of the Department Head. Any executed agreement must be provided to Resources Victoria. The condition supports agreement-making between WIM and BGLC, in circumstances where the timing of the licence decision means that the requirements of the LUAA do not yet apply. The condition is not a requirement to obtain BGLC's consent and does not prohibit every form of ground-disturbing work pending agreement.

Sustainable development and biodiversity

77. I have had regard to the principles in section 2A of the Act. Granting mineral tenure enables WIM to progress development of the Avonbank resource, with prospective employment, procurement and business opportunities contributing to economic development in the Wimmera Southern Mallee. These benefits are relevant to paragraphs (a), (d) and (h). I weighed them against the potential loss of agricultural productivity, disruption to farming households and long-term rehabilitation liabilities discussed in section 6. Those effects bear on community wellbeing and equity within and between generations under paragraphs (a) and (b).
78. The protection of biodiversity and ecological integrity under paragraph (c) informed my acceptance of the proposal to retain Greenhills Road reserve and exclude the Johns residence, memorial and adjoining vegetation from disturbance. Section 6 explains these measures and the work plan controls through which they are to be implemented. Consistent with paragraph (f), I considered the environmental and social effects discussed in that section alongside the economic benefits over the project's life, including the period of rehabilitation.
79. I applied the precautionary principle in paragraph (g) to the uncertainty concerning soil reconstruction, agricultural productivity and water impacts. The later Banyena evidence reinforced the importance of establishing reliable agricultural benchmarks and assessing rehabilitation performance. Conditions 5 and 6 require soil surveys and agricultural baseline assessments before the specified disturbance, while condition 8 requires adaptive water management and updated groundwater assessment. The Schedule of Conditions also requires measures to protect soil health and control erosion and contaminated runoff. Together with the proposed progressive mining and rehabilitation sequence, these requirements support my preference for grant with safeguards, for the reasons concerning rehabilitation and water set out in section 6. I recognise that baseline assessment and monitoring do not themselves guarantee successful rehabilitation or prevent irreversible harm.
80. The additional conditions respond to particular risks: conditions 2 and 3 address engagement and access, conditions 4 and 9 address health-related monitoring, and conditions 5, 6 and 8 address agricultural and water risks. Their purposes are explained in section 9. I regard these targeted requirements as proportionate responses under paragraph (e). My consideration of submissions, the quarterly engagement reporting required by condition 2 and the BGLC agreement-making requirement in condition 10 support community involvement and respect for community and Indigenous aspirations under paragraphs (h) and (i).
81. For section 4B of the *Flora and Fauna Guarantee Act 1988*, I considered the project's effects on threatened grassland and habitat identified in section 5.1 of the Minister for Planning's assessment, including the potential for permanent loss and cumulative effects. Avoiding the significant Greenhills Road grassland and the vegetation adjoining the Johns memorial informed my decision to accept the modified proposal.

Climate change

82. I considered climate change in accordance with section 20 of the *Climate Action Act 2017*, having regard to its policy objectives and guiding principles. The project would generate emissions from fuel use, electricity and associated activities. Those emissions add to the reductions required elsewhere to achieve Victoria's targets. A small proportion of statewide emissions is not, by itself, a reason to disregard that contribution.
83. The climate assessment reports operational estimates of 74,493 tonnes of carbon dioxide equivalent a year for Scope 1 emissions and 112,516 tonnes for Scope 2 emissions, based on a throughput of 10 million tonnes a year. Taken together, those separate estimates amount to approximately 187,000 tonnes a year. They concern the wider project, including processing outside the licence area. The assessment identifies limitations in indirect emissions coverage, excludes decommissioning emissions and does not provide a complete lifetime forecast. I have considered the separate estimates without adopting the inconsistent description elsewhere in the assessment of them as a combined emissions range. The project would add emissions during a period in which Victoria is pursuing its interim reduction targets and net zero by 2045. Electricity emissions may decline as the

grid decarbonises, but that does not remove the need to address direct fuel emissions or justify if all forecast reductions will occur.

84. I also considered physical climate risks, including heat, fire, drought and intense rainfall, and their implications for water, infrastructure, soils, rehabilitation and nearby communities. Resilience and adaptation require attention to those risks in drainage, water management, fire preparedness and rehabilitation. The Schedule of Conditions requires fire prevention measures, firefighting equipment and a fire response and readiness plan, as well as erosion, sediment and contaminated-runoff controls. Condition 8 requires adaptive review of water risks. These are practical safeguards relevant to climate resilience, although they do not establish that every climate-related risk has been resolved. This gives effect to the policy objectives concerning resilient communities, infrastructure and natural systems, and to the principles of informed decision-making and risk management.
85. The minerals produced may contribute to supply chains supporting a lower-emissions economy. I give that potential contribution weight under the transition objective, without treating it as a quantified offset for the project's emissions. I considered the regional opportunities alongside burdens on farming households and future landholders, consistently with the objectives of social justice and intergenerational equity and the principles of integrated decision-making and equity.
86. Community engagement provides a means for affected people to raise climate-related concerns and participate in responses. The measures must also operate coherently with State and Commonwealth climate and environmental requirements.
87. I have considered the project's greenhouse gas emissions, its exposure to climate-related risks and the implications for affected communities, agriculture and rehabilitation. The additional emissions weigh against grant because they add to the reductions required to achieve Victoria's emissions targets. I have weighed that impact against the project's prospective economic and regional benefits, recognising that those benefits do not offset its emissions. I also give weight to the drainage, fire-management and adaptive water-management requirements, which address aspects of climate resilience, and to continuing community engagement as a means of identifying and responding to concerns.
88. I consider the available emissions estimates, their identified limitations and the assessment of physical climate risks sufficient to inform this decision to grant mineral tenure. The grant does not approve the commencement of mining or the outstanding management plan. On balance, climate change considerations do not warrant refusal of the licence, but remain material to the detailed assessment and management of the proposed operations.

Human rights

89. I considered the human rights and the potential impacts on human rights of granting the licence, as required by section 38(1) of the *Charter of Human Rights and Responsibilities Act 2006*. Relevant rights include movement, privacy and home, protection of families and children, property, Aboriginal cultural rights. I gave particular attention to displacement, disruption to farming households, health risks and effects on Traditional Owners' relationships with land and waters.
90. I considered whether refusal of the licence application, a smaller licence area, a shorter term or protective conditions as options to limit the impacts on human rights. The memorial-site excision, 20-year term, access protections, environmental safeguards and engagement requirements reduce identified impacts while allowing development of the resource. Land-access and compensation requirements provide further protection, but do not resolve every effect on homes, families or culture. The BGLC agreement-making condition supports engagement with BGLC in relation to their rights.
91. I have weighed the potential impacts on landowners' and occupiers' use of their property, affected families' homes and wellbeing, freedom of movement and Aboriginal people's cultural relationships with land and waters against the purpose and benefits of developing the mineral resource. I recognise that displacement, access restrictions and disruption to farming households may be substantial and prolonged. Having considered the alternatives, the environmental assessment and the safeguards described above, I consider the grant with the reduced area, 20-year term and protective conditions included in the licence a proportionate means of enabling development of the mineral resource while limiting the impacts on rights identified. On that basis, I am satisfied that any resulting limitations on those rights are reasonable and demonstrably justified under section 7(2), and that the grant is compatible with human rights.

Overall conclusion

92. For the reasons set out above, I am satisfied of the matters required for grant under the Act, including the requirements of sections 15 and 16. I have considered the matters required under section 25, including objections and comments made under sections 24 and 24A. I was not satisfied that any matter warranted refusal of the licence. I have had regard to the purposes and objectives of the Act and the sustainable development principles in section 2A.
93. I have given substantial weight to agricultural and rehabilitation risks, disruption to households, environmental effects and Traditional Owner interests. My assessment of those matters, together with the findings supporting the Applicant's suitability, capability and the project's economic viability, supports grant over the reduced area for an initial term of 20 years, subject to the conditions explained above. Having considered whether to exercise the discretion to refuse the application, I am satisfied that grant on those terms is appropriate.
94. I therefore decided to grant MIN008642 under sections 25 and 26 for the area, term and conditions specified in the Instrument of Grant. The licence takes effect on registration.

Attachments

Attachment 1

Signed instrument of grant

Daniel Thompson

Director, Statutory Authorisations
Regulatory Operations, Resources Victoria

Date: 6 October 2026

MINERAL RESOURCES (SUSTAINABLE DEVELOPMENT) ACT 1990**SCHEDULE 4**

Regulation 28(2)

MINING LICENCE - MIN008642

I, Daniel Thompson, acting as the delegate of the Minister, grant to **WIM Resource Pty Ltd of Suite 2004, Level 20, 201 Elizabeth Street, Sydney, New South Wales 2000** this mining licence. This licence is granted under Section 25 of the *Mineral Resources (Sustainable Development) Act 1990* (the Act) and is effective for a term of **20** years from the date of registration.

This licence is subject to the following conditions and to the Schedule of Conditions attached:

1. From the date of registration of the licence, the licensee must expend **\$3,067,893** per year on work in the licensed area, unless this requirement is varied, or application of this requirement is suspended for a specified period, in accordance with the Act.
2. In addition to annual reporting, the licensee must provide quarterly reports covering the reporting periods ending on 30 September, 31 December, 31 March and 30 June each year. Each quarterly report must be submitted within six weeks after the end of the relevant reporting period. Each quarterly report must include information on the community engagement activities undertaken in accordance with the Community Engagement Plan. The report must demonstrate that reasonably practicable actions have been taken to address concerns raised through the community engagement process and must include all complaints, enquiries and feedback received during the reporting period and how these matters have been addressed.
3. Road access to the property and memorial area on Max Johns Road, Dooen, must be always maintained. Access arrangements are to follow an agreed protocol with the landholder, which must also ensure emergency services access.
4. Before commencing work on the licence, the licensee must ensure that a suitably qualified person conducts baseline monitoring of crop and rainwater tanks to analyse dissolved and total metals as well as testing in accordance with ISO10703. Ongoing monitoring of crops and rainwater tanks must be conducted during operation and closure according to a schedule that is proportionate to the risk of harm to human health, as negotiated with each landholder. The licensee must take an adaptive approach that responds to changing risks based on monitoring results. Crop and rainwater tank monitoring data must be published on the licensee's website (where consent has been provided by the land occupiers/landowners), following each monitoring period.
5. Before stripping topsoil within a landholding, the licensee must ensure that a suitably qualified person undertakes a pre-mine soil survey of the area to be disturbed. The survey must be conducted at an appropriate intensity to characterise the materials that will be stripped and stockpiled for later placement in the reconstructed soil profile. Field characteristics must be logged, and representative samples submitted for laboratory analysis, including but not limited to sodicity, salinity and pH.
6. A detailed agricultural baseline assessment (ABA) must be completed prior to mining within each landholding or paddock by a suitably qualified person. The outcomes of the assessment must inform the setting of appropriate performance standards and rehabilitation criteria (including but not limited to yield).

The ABA must describe matters including but not limited to:

- a) Soil chemical and physical characterisation;
- b) Site-specific fertiliser, weed management, herbicide history and past yields for a range of cropping varieties (where information is available and has been provided by the landholder);
- c) Site survey levels;
- d) Climatic conditions

7. Should the retention of Greenhills Road reserve lead to changes to the mine layout and/or sequencing and the potential for new or increased impacts such as increased noise and/or air emissions, these changes need to address the EPA's General Environmental Duty. Any new or increased impacts to those reported in the Environment Effects Statement must be discussed with EPA and other relevant statutory authorities to ensure that acceptable environmental outcomes can be achieved.
8. Throughout the term of the licence, the licensee must take an adaptive management approach that responds to changing risks to surface and groundwater during mining and rehabilitation. The licensee must review the risks of harm to human health and the environment in the context of surface and groundwater impacts by updating the groundwater impact assessment:
 - a) when new information attained through groundwater monitoring data or updated modelling suggests the risks of harm to human health and the environment have increased or otherwise, every five years.
9. Biannual sampling of airborne particulate matter must be analysed for radionuclides in accordance with ISO15202 and must be conducted by a suitably qualified person. The licensee must take an adaptive approach that responds to changing risks based on sampling results. Radiation monitoring, including airborne particulate radionuclide sampling, must be undertaken in accordance with the Radiation Management Licence and Radiation Management Plan approved by the Department of Health. Monitoring frequency must remain adaptive and risk-based as determined through the Radiation Management Plan
10. Prior to the commencement of any mining activities within the licence area, the licence holder must take all reasonably practicable steps to enter into an agreement relating to any Crown land within the licence area that is consistent with the Traditional Owner Settlement Act 2010 with the Barengi Gadjin Land Council Aboriginal Corporation, to the satisfaction of the Department Head. A copy of any executed agreement must be provided to Resources Victoria.

Signed by



Daniel Thompson
 Director, Statutory Authorisations
 Regulatory Operations, Resources Victoria

Date: 6 October 2026

Date of Registration <u>06/10/2026</u> Time of Registration <u>11:23 am</u> 
REGISTRAR Mineral Resources (Sustainable Development) Act 1990

F 90017473

Note: Pursuant to section 26(10) of the Act, the areas of Retention Licence RL2014 overlapping the mining licence ceased as a result of the registration of the grant of this Mining Licence.

Schedule of Conditions

IMPORTANT NOTE: The conditions in this schedule address a wide range of activities. You may not have approval for all the activities described. Work other than “low impact exploration” may only be undertaken in accordance with a work plan approved by the Department of Energy, Environment and Climate Action (DEECA).

PART A GENERAL CONDITIONS

1. WORKING IN ACCORDANCE WITH THE APPROVED WORK PLAN

- 1.1. The licensee must carry out work in accordance with the Approved Work Plan and any subsequent Approved Work Plan Variations.
- 1.2. Where any inconsistency occurs between an Approved Work Plan and/or an Approved Work Plan Variation or the associated Approved Work Plan conditions, and other licence conditions and/or regulations, the licence conditions and/or regulations have precedence.
- 1.3. Where requested by the Department Head, the licensee must submit a Work Plan Variation.

2. DOCUMENTATION AND RECORDS

- 2.1. The licensee must record activities undertaken and the subsequent results obtained, regarding the implementation of any auditing, environmental and rehabilitation monitoring programs, and complaints received.
- 2.2. The licensee must ensure that documentation generated for any auditing, environmental and rehabilitation monitoring program, and any complaints received is appropriately stored and accessible to relevant personnel and is available upon request by an Inspector.

3. ADMINISTRATIVE ARRANGEMENTS

- 3.1. The licensee must ensure that the relevant Resources Victoria (RV) Deputy Chief Inspector is at all times aware of the appropriate contact person for activities conducted within the licence including exploration.
- 3.2. Prior to commencing ground intrusive work or work involving the removal or damaging of native vegetation under the definition of low impact exploration the licensee must submit a rehabilitation bond to the satisfaction of the Minister
- 3.3. Where ground intrusive work or work involving the removal or damaging of native vegetation is carried out under the definition of low impact exploration the licensee must notify the Crown land manager (for works on Crown land) and the RV Chief Inspector at least 7 days prior to the commencement of work. Notification must include:
 - Start date, and
 - Proposed ground intrusive work, and/or
 - Proposed removal or damaging of native vegetation, and
 - Location.

4. PUBLIC LIABILITY INSURANCE

- 4.1. Prior to commencing any work, the licensee must have public liability insurance that covers all work authorised under the licence and ensure the insurance is valid at all times while work occurs under the licence.

5. PUBLIC SAFETY

- 5.1. The licensee must ensure that public safety is maintained within the licence area at all times, including through the use of fencing, gates and signage as required around the work area.
- 5.2. The licensee must ensure that all fences are maintained to prevent access to the work site and that all gates are locked when the work site is unattended.

6. FIRE RISK MANAGEMENT

- 6.1. The licensee must take all reasonable measures to prevent the ignition and spread of fire.
- 6.2. The licensee must ensure that all buildings, fixed plant and mobile equipment are fitted with fire-fighting equipment, such as fire extinguishers, fire blankets, knapsack spray pumps and rake-hoes.
- 6.3. The licensee must develop and implement an appropriate fire response and readiness plan.

7. DESIGNATED PARKING AREAS

- 7.1. The licensee must provide designated parking areas for employees and visitors at the work site.
- 7.2. The licensee must ensure that the designated parking area is of sufficient size to accommodate the expected number of vehicles that employees and visitors may bring to the work site on a daily basis.
- 7.3. The licensee must ensure that designated parking areas are designed and constructed to provide safe access for vehicles and people.

8. COMPLAINTS MANAGEMENT

- 8.1. The licensee must establish and maintain a complaints register.
- 8.2. In response to a complaint, the licensee must record the following information in the complaints register:
 - (a) the date and time of the complaint;
 - (b) who the complaint was from;
 - (c) the specific issue/s raised in the complaint; and
 - (d) the actions taken to address the specific issue/s raised in the complaint.

9. NON-COMPLIANCE AND ENVIRONMENTAL INCIDENT NOTIFICATION

- 9.1. In the event that the licensee becomes aware of:
 - (a) any non-compliance with the conditions of the licence and/or the approved work plan, including the intersection of ground water where dry extraction is proposed, and/or;
 - (b) an environmental incident that will or is likely to cause, significant harm to the environment;the licensee must as soon as is practicably possible notify the relevant Deputy Chief Inspector of the non-compliance and/or environmental incident.
- 9.2. The licensee must also notify any other relevant government department, agency or management authority of the non-compliance and/or incident.
- 9.3. Where requested to provide a written report on the non-compliance or environmental incident, the licensee must provide a written report within 5 business days of the request that includes the following information:
 - (a) the date and time of the non-compliance and/or environmental incident;
 - (b) the cause, or likely cause of the non-compliance and/or environmental incident;
 - (c) the impacts, or likely impacts of the non-compliance and/or environmental incident;
 - (d) the actions that have been taken to prevent, minimise or otherwise manage the impacts, or likely impacts of the non-compliance and/or environmental incident; and
 - (e) the actions that will be taken to prevent such a non-compliance and/or environmental incident from happening again in the future.

10. REPORTING, MONITORING AND AUDITING

- 10.1. The licensee must implement a program for monitoring environmental impacts and rehabilitation.
- 10.2. The licensee must submit an Annual Report to the Deputy Chief Inspector that includes:
 - (a) an outline of exploration and mining activities undertaken over that year;
 - (b) the results of any environmental audits conducted over that year;
 - (c) details of current progressive rehabilitation activities and targets;

- (d) details of completed rehabilitation activities over that year.

PART B ACTIVITY BASED CONDITIONS

11. GROUND DISTURBANCE

- 11.1. The licensee must minimise the area of ground disturbance throughout the life of the mining operation.
- 11.2. The licensee must not open up any area for mining and ancillary operations except where approved in the Approved Work Plan.

12. SOIL MANAGEMENT

- 12.1. The licensee must take all reasonable measures to minimise adverse impacts on the physical and biological health of soil within the licence.
- 12.2. Where excavation occurs, the licensee must ensure that topsoil to a depth of 150mm below the natural surface is removed and placed in stockpiles not exceeding 2m in height.
- 12.3. The licensee must ensure that topsoil stockpiles are protected from erosion and compaction.

13. EROSION, DRAINAGE AND WATER QUALITY CONTROLS

- 13.1. The licensee must design, install and maintain erosion and sediment controls to prevent erosion of areas of disturbed land and sedimentation of waterways.
- 13.2. Where activities are being conducted in waters or on the banks of waterways with water in them, the licensee must take all reasonable measures to minimise sedimentation of the water in the waterway.
- 13.3. The licensee must take all reasonable measures to prevent contaminated runoff from entering receiving waterways.

14. VEGETATION MANAGEMENT AND BUFFER ZONES

- 14.1. The licensee must take all reasonable measures to avoid, minimise and/or offset the removal and disturbance of native vegetation.
- 14.2. Where activities not covered by an approved work plan are proposed to be undertaken in a Box-Ironbark region, the licensee must undertake a preliminary assessment of vegetation and faunal habitats of areas of interest in that Box-Ironbark region to identify and mark areas or sites to be avoided.
- 14.3. The licensee must erect and maintain posts or star pickets painted yellow to stand not less than 0.75 meters in height around the final approved limits of extraction, or as agreed in writing with the RV Inspector.
- 14.4. Extraction limit posts as required at 14.3 must be situated so that each post is clearly visible from each adjacent post.
- 14.5. The licensee must not undertake any excavation work, or remove any vegetation other than noxious weeds, whether in part or in whole, within any buffer zone shown on the approved work plan.
- 14.6. The licensee must maintain the buffer zone to ensure that the required visual screen is provided between the relevant mining works and surrounding land and/or buildings.
- 14.7. Unless otherwise agreed, the licensee must use species that are indigenous to the area and are appropriate to the licence area's Ecological Vegetation Class (EVC) when establishing plants within the buffer zone.

15. NOXIOUS WEEDS AND PESTS

- 15.1. The licensee must establish and implement a program to control and/or eradicate noxious weeds and pest animals within the licence area.
- 15.2. The licensee must take all reasonable measures to prevent the spread of declared noxious weeds, pest animals and plant diseases within the licence area.

- 15.3. The licensee must ensure that all mobile machinery is thoroughly cleaned prior to coming onto, or leaving a work area.
- 15.4. The licensee must ensure that all soil and aggregate that is imported into and exported out of the licence area is free of declared noxious weeds, pest animals and plant diseases.

16. AIR EMISSIONS, DUST AND LIGHTING

- 16.1. The licensee must take all reasonable measures to prevent adverse impacts as a result of the release of dust, odour and/or emission of light including that generated by exploration activities not requiring an approved work plan.

17. NOISE EMISSIONS

- 17.1. The licensee must take all reasonable measures to ensure that noise emissions are minimised as far as is practicable and comply with any limits set in the Approved Work Plan.
- 17.2. The licensee must take all reasonable measures to avoid causing nuisance noise including that generated by exploration activities not requiring an approved work plan.

18. VISUAL AMENITY

- 18.1. The licensee must take all reasonable measures to ensure that the colour of fixed plant and buildings do not cause an adverse impact on surrounding visual amenity.
- 18.2. The licensee must consult with the relevant Inspector and the Crown land Manager or the responsible authority on private land prior to painting any fixed plant and/or buildings.

19. HERITAGE SITES

- 19.1. The licensee must ensure that no work is carried out, without appropriate consent, within 100 metres laterally of a registered Aboriginal place recorded in the Victorian Aboriginal Heritage Register, or within 100 metres below that place.
- 19.2. The licensee must ensure that no work is carried out, without appropriate consent, within 100 metres laterally of an archaeological site on the Heritage Inventory or a place or object included in the Heritage Register or within 100 metres below that site, place or object.

20. HAZARDOUS MATERIALS MANAGEMENT

- 20.1. The licensee must take all reasonable measures to prevent contamination of the environment by the release of fuels, lubricants and/or hazardous materials including those used for exploration activities not requiring an approved work plan.
- 20.2. The licensee must install trays or similar apparatus beneath machinery to protect the soil and vegetation from leaks or spills of fuels, lubricants and/or hazardous materials.
- 20.3. The licensee must ensure that all fuels, lubricants and/or hazardous materials are stored in accordance with the relevant requirements of the current Australian Standards for the Storage and Handling of Flammable and Combustible Liquids.
- 20.4. The licensee must ensure that any drainage from an area where fuels, lubricants and/or hazardous materials are stored, and/or used is directed to a sump or interceptor trap.
- 20.5. The licensee must ensure that all mobile plant and machinery including mobile fuel storages have immediate access to, and wherever possible are fitted with, spill prevention and clean up equipment.
- 20.6. The licensee must ensure that spills of fuels, lubricants and/or hazardous materials are cleaned up as quickly as practicable. Such spillage must not be cleaned up by hosing, sweeping or otherwise releasing such contaminant into waterways. Equipment and soil contaminated by fuels, lubricants, hazardous materials and clean up substances which cannot be salvaged must be disposed of in an approved waste facility.

21. WATER DAMS

- 21.1. The licensee must ensure that the location, design, construction, operation and safety management of water dams on the licence area are undertaken in accordance with the Approved Work Plan.

22. SLOPE STABILITY

- 22.1. The licensee must ensure that all slopes/batters including excavations, roadways, stockpiles and dumps must be designed, constructed and maintained to ensure stability.
- 22.2. Should a significant slope failure event occur, the licensee must cease all operations, notify the relevant Deputy Chief Inspector and not recommence operations until authorised to do so by the relevant Deputy Chief Inspector.

23. INTERNAL ROADS

- 23.1. The licensee must consult with the relevant Inspector, the Crown land Manager or private land owner/occupier prior to establishing any roads on the licence area.
- 23.2. The licensee must construct any roads on the licence area in accordance with the direction provided by the DEECA Inspector, the Crown land Manager or private land owner/occupier.
- 23.3. The licensee must ensure that an internal road is only used by:
- (a) employees of, or persons authorised by, the relevant Crown land Manager, or persons engaged in fire control where the licence covers Crown land; or
 - (b) the landowners or their agent/s where the licence covers private land.
- 23.4. The licensee must ensure that all roads on the licence area are properly formed, surface treated, drained and maintained to provide for the safe operation of the road.

24. DERELICT AND REDUNDANT PLANT

- 24.1. The licensee must ensure that all derelict and redundant plant, vehicles, machinery and equipment are removed from the licence area and deposited at an appropriate waste disposal site or otherwise stored or disposed of in accordance with the Approved Work Plan.

25. REHABILITATION

- 25.1. The licensee must ensure that progressive rehabilitation of disturbed land is carried out as soon as possible including those areas used for exploration activities not requiring an approved work plan.
- 25.2. The licensee must ensure that, as required, Indigenous species used in rehabilitation must be sourced from the local area, be of local provenance and be appropriate to the site's Ecological Vegetation Class (EVC).
- 25.3. The licensee must ensure that final rehabilitation is in accordance with the Approved Work Plan.

26. CAMPING

- 26.1. The licensee may only establish campsites with the permission of the Crown land Manager or private land owner/occupier.
- 26.2. The licensee must select, establish and manage campsites to minimise risks to the environment and public safety.

27. WORKING HOURS

- 27.1. The licensee must conduct all works in accordance with the working hours in the Approved Work Plan and any working hour requirements of a planning consent. If there is inconsistency between the Approved Work Plan and planning consent then the hours indicated in the planning consent have precedence.

28. GEOPHYSICAL AND GEOCHEMICAL SURVEYS AND GRIDLINES

- 28.1. In designing and constructing geophysical and geochemical surveys, the licensee must take all reasonable measures to prevent adverse impacts to the environment and public safety.
- 28.2. Prior to designing and constructing geophysical and geochemical surveys, the licensee must consult with the Crown land Manager and/or private land owner/occupier about the position of gridlines and geophysical lines.

29. LIVESTOCK, DOMESTIC ANIMALS AND CROPS

- 29.1. The licensee must take all reasonable measures to prevent adverse impacts to livestock and crops as a result of mining and exploration activities.

30. DRILL SITES, COSTEANS, TRENCHES AND BULK SAMPLING EXCAVATIONS

- 30.1. The licensee must take all reasonable measures to prevent adverse impacts of establishing costeans, drill holes, bulk sample excavations and trenches to the environment and public safety.

31. DRILLHOLE OPERATIONS, CONSTRUCTION AND DECOMMISSIONING

- 31.1. The licensee must ensure that all reasonable measures are taken to minimise the impacts of drilling operations and that the operations are conducted in a manner that ensures protection of the environment, public safety and amenity.
- 31.2. The licensee must prevent contamination of aquifers as a result of drilling operations.
- 31.3. The licensee must ensure that where a drillhole is to be left open overnight or longer, a temporary cap is fitted.
- 31.4. The licensee must ensure that accurate records of decommissioning procedures are kept to provide future reference, and to demonstrate to the department that the drillholes have been satisfactorily plugged and abandoned.

32. UNDERGROUND EXPLORATION

- 32.1. The licensee must ensure that underground exploration and development works, access shafts, adits and declines are made safe.
- 32.2. The licensee must ensure that on completion of underground exploration and development works, access shafts, adits or declines no longer required are permanently closed off and the site made safe for the public and wildlife.

33. TAILINGS MATERIALS AND STORAGE FACILITIES

- 33.1. The licensee must take all reasonable measures to minimise the generation of tailings material.
- 33.2. The licensee must ensure that the location, design, construction, operation and safety management of tailings dams on the licence area are undertaken in accordance with the Approved Work Plan.
- 33.3. The licensee must, in accordance with current recommended practice or guidelines, construct and maintain monitoring bores for the purposes of assessing potential seepage from tailings dams.
- 33.4. On detection of seepage from monitoring bores, the licensee must immediately inform the relevant Deputy Chief Inspector.

34. CYANIDE MANAGEMENT

- 34.1. The licensee must ensure that:
 - (a) pipelines used to transport cyanide solutions are placed in a trench and protected from mechanical damage.
 - (b) pipelines used to transport cyanide solutions comply with the relevant requirements of the current Australian Standards for the Identification of the Contents of Pipes, Conduits and Ducts.
 - (c) discarded pipelines and equipment that were used to transport cyanide solutions are

destroyed and disposed of off site to an appropriately authorised land fill.

- (d) pipelines and outlets used to transport potable water are clearly identified and kept separate from pipelines and outlets used to transport cyanide solutions.
 - (e) all reasonable measures are taken to prevent spills of cyanide solutions.
 - (f) any spill of cyanide solution is immediately cleaned up and disposed of in accordance with emergency management procedures.
 - (g) equipment and materials required for the containment, stabilisation and treatment of spills of cyanide solutions are readily available and appropriate employees trained in their use.
- 34.2. On cessation of mining activities on the licence, the licensee must ensure all process cyanide is:
- (a) removed; or
 - (b) treated on site; or
 - (c) stored in a tailings dam
- 34.3. On cessation of mining activities on the licence, the licensee must undertake tests to determine the concentration and composition of any cyanide remaining in a tailings dam.
- 34.4. The licensee must provide the results of the test taken under condition 34.3 in writing to the relevant Deputy Chief Inspector within 5 business days of the test result becoming available.

35. AIRBLAST AND GROUND VIBRATION LIMITS

- 35.1. The licensee must ensure that the peak particle velocity resulting from blasting operations, as measured in the vicinity of any sensitive location in accordance with the current Australian Standards for Explosives - Storage and Use - Use of Explosives, does not exceed 5mm/s on more than 5% of blasts fired in a 12 month period and 10mm/s at any time.
- 35.2. The licensee must ensure that the airblast overpressure from blasting operations, as measured in the vicinity of any sensitive location in accordance with the current Australian Standards for Explosives - Storage and Use - Use of Explosives, does not exceed 115 dB(L) on more than 5% of blasts fired in a 12 month period, and 120 dB(L) at any time.

36. EXPLOSIVES

- 36.1. When using explosives or high electrical currents, all reasonable measures must be taken to prevent adverse impact on or significant disturbance to the public and environment.

PLAN OF AREA

Mining Licence No. 008642

Mineral Resources (Sustainable Development) Act 1990



Energy,
Environment
and Climate Action

Name of Licensee:

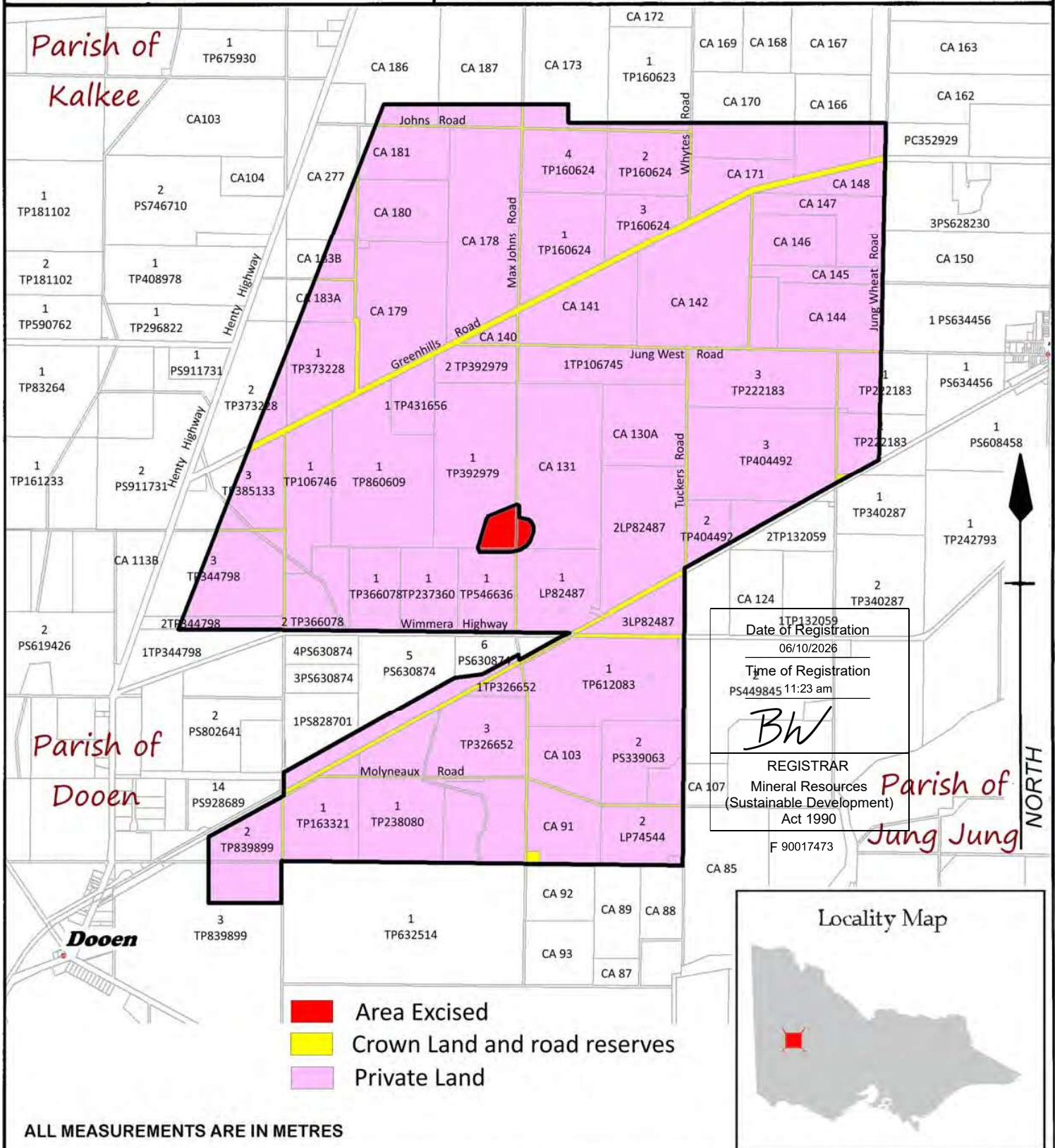
WIM Resource Pty Ltd

SHIRE OF Horsham

PARISH OF Jung Jung, Dooen and Kalkee

TOTAL AREA 3426.00 Hectares

NET AREA 3408.77 Hectares



Certified correct
Licensed Surveyor

Ferguson Perry Surveying Pty Ltd

Checked
Date

Christy Thiagarajah
03 / 11 / 2025