

APPENDIX C – ANNUAL AUDIT COMPLIANCE REPORT

Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Once completed, please submit this form either via email to info-der@dwer.wa.gov.au, or to the below postal address:

Department of Water and Environmental Regulation
Locked Bag 33 Cloisters Square
PERTH WA 6850

Section A – Licence Details

Licence number:	L8593/2011/2	Licence file number:	2011/007842
Licence holder:	EMR Golden Grove Pty Ltd		
Trading as:	EMR Golden Grove		
ACN:	114868325		
Registered address:	Suite 1, 38 Colin Street West Perth WA 6005 Australia		
Reporting period:	01/ 01 /2019 to 31/12/2019		

Section B – Statement of Compliance with Licence Conditions

Did you comply with all of your licence conditions during the reporting period?
(please tick the appropriate box)

☐ Yes – please complete:

- section C;
- section D if required; and
- sign the declaration in Section F.

☒ No – please complete:

- section C;
- section D if required;
- section E; and
- sign the declaration at Section F.

Section C – Statement of Actual Production

Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.

Prescribed Premises Category	Actual Production Quantity
Processing of Metallic ore (total Ore Milled)	1,290,345
Volume of Treated Sewage	16.15 ML
Liquid Waste Facility	1224 Tonnes
Landfill Site	421 Tonnes

Section D – Statement of Actual Part 2 Waste Discharge Quantity

Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.

1 DEPARTMENT OF WATER AND ENVIRONMENTAL REGULATION

Section D – Statement of Actual Part 2 Waste Discharge Quantity	
Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity
Tailings Discharge	522,180
Mine Dewatering Discharge	280.9ML

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.5.1	Date(s) of non-compliance:	6/11/2019
Details of non-compliance:			
<p>TDS limit exceeded for MB18 (limit 5000mg/L)</p> <ul style="list-style-type: none"> November – 5220mg/L 			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>As previously reported, Big Dog Hydrogeology's hydrogeological conceptual model identified there is no potential for environmental harm associated with seepage migration in the deep groundwater system, based on several observations (Big Dog Hydrogeology, 2016):</p> <ul style="list-style-type: none"> All seepage within the deep groundwater system is drawn towards and captured by dewatering in the Scuddles and Gossan Hill underground mines. There are no abstractors of groundwater along the current and future flow paths. Although the seepage has degraded the groundwater quality in the deep groundwater system, the deep groundwater system will no longer exist as a resource, as it is being dewatered by the mining operations. Dewatering of the deep groundwater system across the Golden Grove mine is a necessary consequence of maintaining safe working conditions in the underground mines, and is an authorised activity under "Licence to Take Water GWL103574(8)." Dewatering of the deep groundwater system is monitored and is reported to the Department of Water on a triennial basis. 			
Cause (or suspected cause) of non-compliance:			
<p>An investigation concluded that the source of elevated TDS and SO4 levels was due to seepage from Evaporation Pond A (EPA), which contains mine dewatering water.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>DWER raised the TDS limit from 4,000 mg/L to 5,000 mg/L in line with the Australian and New Zealand Environment Conservation Council (ANZECC) 2000 stock watering guidelines.</p> <p>Golden Grove implemented a number of actions in consultation with DMIRS to understand and manage seepage and prevent the potential for environmental harm:</p> <ul style="list-style-type: none"> Vegetation monitoring in the area to the southeast of EPA. Shallow drilling investigations to confirm the extent of saturation within the alluvial sediments down gradient of EPA. 			

Section E – Details of Non-Compliance with Licence Condition

A seepage interception trench was constructed in December 2018. This trench leads to a sump which collects the water before it is pumped back into EPA. Data shows TDS levels reducing from 5450mg/L in October 2018 to 4330mg/L in February 2019, the lowest it has been since 2017. TDS again rose in November 2019. Longer monitoring is needed to assess the effectiveness of the interception trench.

Big Dog Hydrogeology has recommended that the status of deep monitoring bores MB16, MB18 and MB19 is changed from compliance to interpretation (in the DWER License), based on there currently being no potential for environmental harm associated with seepage migration in the deep groundwater system.

Vegetation monitoring was established in 2017 and undertaken again by Mattiske in 2019. This survey concluded that all transects even the controls had some vegetation stress and loss. The impacts of recent leakages from the southern evaporation ponds is confined mainly to the northern sections of Transects 1 and 2.

Was this non-compliance previously reported to DWER?

☒ Yes, and

Reported to DWER verbally

Date:


☒ Reported to DWER in writing

Date: 22/11/2019

Section F – Declaration

I / We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particularⁱ.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature ⁱⁱ :		Signature:	
Name: (printed)		Name: (printed)	
Position:	General Manager Operations	Position:	
Date:	30 MARCH 2020	Date:	
Seal (if signing under seal):			

ⁱ It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

ⁱⁱ AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.