



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details

Licence number:	L8593/2011/2	Licence file number:	2011/007842
Licence holder:	EMR Golden Grove Pty Ltd (note name change on 01/03/2017)		
Trading as:	EMR Golden Grove		
ACN:	114868325		
Registered address:	Suite 1, 38 Colin Street West Perth WA 6005 Australia		
Reporting period:	01/01/2017 to 31/12/2017		

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
05 – Processing of metallic ore (total ore milled)	956,736 t
54 – Volume of treated sewage	32,637 m ³
61 – Liquid Waste Facility	1,286 kL (approximately 1,286 t) of industrial wash water (L150)
89 – Landfill site	138.3 t

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.

Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity
05 – Tailings discharge	3,544,458 m ³ (containing 779,222 dry tonnes tailings solids)
06 – Mine dewatering discharge	553,857 m ³ (approximately 553,857 t)

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:	3.2.1	Date(s) of non-compliance:	January 2017
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Details of non-compliance:

Aluminium, mercury, nickel, phosphorus, and total suspended solids (TSS) were not analysed for January 2017 monitoring period.

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

No environmental impact anticipated. Monitoring results for aluminium, mercury, phosphorus and TSS prior to and following January 2017 show no indication of elevation.

Cause (or suspected cause) of non-compliance:

On investigation it was identified that the laboratory had not completed the required testing despite being provided with the correct parameter list.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

EMR Golden Grove subsequently changed laboratory provider, and new laboratory service has not made any errors in testing. A detailed sample tracking and quality control process has been implemented to provide increased detection of errors.

Was this non-compliance previously reported to DER?

☐ Yes, and

☐ Reported to DER verbally

Date: / /

☐ Reported to DER in writing

Date:

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:	30 June 2017
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Details of non-compliance:

Exceedance of total dissolved solids (TDS) limit (5,000 mg/L) at MB18. This is a continuation of the TDS exceedance reported in previous years for MB18.

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

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):

- 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:

An investigation concluded that the source of elevated TDS levels was due to seepage from Evaporation Pond A (EPA), which contains mine dewatering water.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

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.

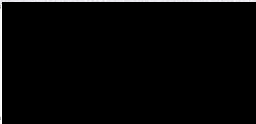
Golden Grove implemented a number of actions in consultation with DMIRS to understand and manage seepage and prevent the potential for environmental harm:

- 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.
- Investigate why the seepage recovery system has failed to control groundwater levels in the shallow groundwater system.
- Conduct electromagnetic survey around the evaporation pond to determine nature and extent of seepage.
- Design of a seepage recovery system from within the alluvial sediments at the toe of the EPA embankment, to ensure that the shallow groundwater does not discharge to surface or

<p>approach the root zone of the down-gradient vegetation.</p> <p>One further action is outstanding with the seepage recovery system scheduled to be implemented by 30th June 2018. This action is currently underway.</p> <p>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.</p>	
<p>Was this non-compliance previously reported to DER?</p>	
<p><input checked="" type="checkbox"/> Yes, and</p>	
<p><input type="checkbox"/> Reported to DER verbally</p>	<p>Date: / /</p>
<p><input checked="" type="checkbox"/> Reported to DER in writing</p>	<p>Date: 04/05/2016</p>

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 particular¹. I/We consent to the Annual Audit Compliance Report being published on the Department of Environment Regulation's (DER) website.

Signature ² :		Signature:	
Name: (printed)	Duncan Bradford	Name: (printed)	
Position:	General Manager	Position:	
Date:	27/3/18	Date:	
Seal (if signing under seal):			

¹ 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.

² 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.