



## Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L4496/1988/11	Licence file number:	2010/003418-1
Licence holder:	Big Bell Gold Operations Pty Ltd		
Trading as:	Big Bell Gold Operations Pty Ltd		
ACN:	090 642 809		
Registered address:	Level 6, 197 St Georges Terrace Perth WA, 6000		
Reporting period:	01/09/2020 to 31/08/2021		

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)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none"><li>• section C;</li><li>• section D if required; and</li><li>• sign the declaration in Section F.</li></ul>
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"><li>• section C;</li><li>• section D if required;</li><li>• section E; and</li><li>• sign the declaration at Section F.</li></ul>

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
5 – Processing or Beneficiation of metallic or non-metallic ore	1,726,017 tonnes
6 – Mine Dewatering	2,614,329 tonnes
63 – Class I inert landfill site	805 tonnes
85 – Sewage facility	55 cubic metres per day

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
5 – Processing or Beneficiation of metallic or non-metallic ore	1,726,017 tonnes
6 – Mine Dewatering	2,614,329 tonnes

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:	3.4.1	Date(s) of non-compliance:	24/01/2021
Details of non-compliance:			
<p>During the reporting period, Surface Water Level (SWL) was not completed in accordance with Condition 3.4.1, Table 13: Monitoring of ambient groundwater quality for the below:</p> <ul style="list-style-type: none"> <li>PWD2 monitoring bore – January 2021.</li> </ul>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>Recorded SWLs for PWD2 fluctuated up and down within a 1.5m range during the reporting period, but overall remained within the long-term monitoring trend. Despite failure to measure PWD2 as part of the January 2021 sampling event, the SWL between October 2020 and July 2021 reported only ~0.18m difference, therefore impact to the receiving environment is considered negligible.</p>			
Cause (or suspected cause) of non-compliance:			
<p>On the occasion the SWL was not measured the water level meter had broken, resulting in SWL not being taken.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>A new water level meter was purchased to ensure future SWL measurements could be taken in accordance with the schedule.</p>			
Was this non-compliance previously reported to DWER? No.			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER 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:	3.4.2	Date(s) of non-compliance:	31/10/20, 30/11/20, 30/04/21 & 31/05/21
Details of non-compliance:			
<p>During the reporting period, monthly vegetation monitoring using a drone/UAB mounted NDVI camera was not completed in accordance with Condition 3.4.2, Table 14: Additional monitoring at ephemeral creek discharge location, for the below:</p> <ul style="list-style-type: none"> <li>• Maid Marion discharge NDVI vegetation monitoring – 31/10/2020;</li> <li>• Maid Marion discharge NDVI vegetation monitoring – 30/11/2020;</li> <li>• Maid Marion discharge NDVI vegetation monitoring – 30/04/2021; and</li> <li>• Maid Marion discharge NDVI vegetation monitoring – 31/05/2021.</li> </ul>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>NDVI outputs for the months surrounding the missed periods were consistent with monitoring trend, showing only slight variations. The weekly photographic monitoring of the same area was still conducted as per the Licence conditions which is considered a reliable method to identify changes in vegetation condition. During the months that NDVI was not completed, weekly photo monitoring and field inspection notes confirm the vegetation condition/establishment, or loss appeared to be consistent with the established monitoring trend. Based on the monthly (x 8) UAV NDVI and weekly (52) field photo monitoring reported during the period, the environmental impact of the non-compliance is considered negligible. Despite the missed monitoring events, the combined dataset is considered robust to assess the environmental performance/impact associated with the Maid Marion discharge to land.</p>			
Cause (or suspected cause) of non-compliance:			
<p>During the months NDVI vegetation monitoring did not occur the drone was damaged and was offsite for specialist repairs/maintenance. BBGO owns only this one drone equipped with a suitable camera attachment and capabilities for conducting this specialist NDVI monitoring.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>NDVI flight was conducted as soon as the drone was repaired. BBGO to implement a maintenance strategy to maximise drone availability for environmental monitoring.</p>			
Was this non-compliance previously reported to DWER? No.			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER 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:	3.4.2	Date(s) of non-compliance:	09/03/2021
Details of non-compliance:			
<p>During the reporting period, photographic monitoring of the area around discharge location and immediately downstream of discharge was not completed at one photo point in accordance with Condition 3.4.2, Table 14: Additional monitoring at ephemeral creek discharge, for the below:</p> <ul style="list-style-type: none"> <li>• Maid Marion discharge photo point #2 – 09/03/2021.</li> </ul>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>On the date photo point #2 was missed in the weekly photographic monitoring, all other photo points for the Maid Marion discharge were completed. Photo point #2 was recorded every other week as per the Licence condition. Comparisons before and after the missed date show no difference and therefore the actual or suspected impact to the quality of monitoring dataset or the receiving environment is considered negligible.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The cause for the non-compliance was simply human error, this photo point was not recorded on this particular date.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Review completed field sheet at the field monitoring location to ensure completion of all required data points and when uploading data conduct an additional QA/QC check. If required, remobilise to site to ensure compliance with the monitoring schedule.</p>			
Was this non-compliance previously reported to DWER? No.			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER 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:	3.4.2	Date(s) of non-compliance:	21/07/2021, 27/08/2021
Details of non-compliance:			
<p>During the reporting period, daily physical inspections/monitoring of Maid Marion discharge flows with respect to Meekatharra Water Reserve were not completed on two occasions in accordance with Condition 3.4.2, Table 14: Additional monitoring at ephemeral creek discharge location, for the two days below:</p> <ul style="list-style-type: none"> <li>• Maid Marion discharge flows – 21/07/2021; and</li> <li>• Maid Marion discharge flows – 27/08/2021.</li> </ul>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>On both occasions the daily monitoring was missed, the discharge flows had stopped entering through the Great Northern Highway culvert (monitoring trigger) and no longer approaching the Meekatharra Water Reserve. Daily monitoring conducted the very next day shows the discharge flows had only further receded from the culvert. Based on this, the actual or suspected environmental impact of the non-compliance is negligible.</p>			
Cause (or suspected cause) of non-compliance:			
<p>On 21/07/2021 daily monitoring of the Maid Marion discharge flows was missed due to staff changeover/inexperience.</p> <p>On 27/08/2021 daily monitoring of the Maid Marion discharge flows was missed due to an unrelated incident on site requiring attention.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Daily monitoring was conducted as required the next day following the missed monitoring. BBGO to continue to review monitoring requirements at daily and handover meetings, with specific reiteration attention during time of staff turnover/handover.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

**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 particular<sup>1</sup>. I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature <sup>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:		Date:	
Seal (if signing under seal):			

<sup>1</sup> 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.

<sup>2</sup> 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.