



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

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

Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919

Section A – Licence details			
Licence number:	L5099/1974/14	Licence file number:	2010/007474
Licence holder name:	Southern Ports Authority		
Trading as:	Southern Ports Authority		
ACN:	ABN: 30 044 341 250		
Registered business address:	Level 4, 679 Murray Street, West Perth WA 6005		
Reporting period:	01/10/2024 to 30/09/2025		

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"> section C; section D (if required); and sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"> section C; section D (if required); section E; and sign the declaration in 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
58	4.4 million 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.	
Prescribed premises category	Actual Part 2 waste discharge quantity
58	Not Applicable

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:	18a	Date(s) of non-compliance:	<p>Mt Marion SC6 product 24/01/2025, 21/02/2025, 20/06/2025, 11/07/2025, 01/08/2025, 08/08/2025, 15/08/2025, 29/08/2025, 05/09/2025, 12/09/2025.</p> <p>Mt Cattlin product: 11/11/2024, 10/02/2025, 24/02/2025, 03/03/2025, 17/03/2025.</p>
Details of non-compliance:			
<p>Weekly minesite moisture sample reporting for spodumene products delivered to the Port below the DEM.</p> <p>Mt Marion SC6 spodumene minesite weekly moisture reports indicated the product was delivered to the Port below the 95% CI Dust Extinction Moisture (DEM) limit for the full size (whole of product) testing supplied by the Mt Marion mine. A Confidence Interval was applied to four DEM results provided by the mine up to June 2025, due to variability in the values over time and between laboratories, and to more accurately represent the coarse product. Two weekly reports were below the 95% CI lower value (0.2% and 1.4% below).</p> <p>The annual Mt Marion DEM report was provided in July 2025, this time for the screened <6.3mm size of the product (as per AS4156.6.2000). A 95% Confidence Interval was calculated for the <6.3mm DEM results, to include this result from July 2025 onwards, with eight weekly moisture results below the 95%CI lower value (between 0.1% and 0.4% below).</p> <p>The Mt Cattlin (Galaxy) spodumene product was below the DEM for 4 weeks (between 0.2% and 0.5% below). Product was delivered to POE up to March 2025.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>Nil impact due to enclosed circuit, overhead water spray system used for stockpiled product within the shed and water sprays within the conveyor circuit and shiploader.</p> <p>Refer to Annual Environmental Quality Report 2024-2025 (Section 4.1.2) for further details.</p>			
Cause (or suspected cause) of non-compliance:			

Section E – Details of non-compliance with licence condition	
Minesite product quality management processes.	
DEM analysis method requiring products to be screened to test only the <6.3mm size fraction is not wholly representative of the coarser gravel-like products, where was freely drains from the products.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
Water spray systems are used for stockpiled product within the shed and water sprays used within the conveyor circuit and shiploader for dust suppression.	
Southern Ports have revised its <i>Bulk Mineral Product Quality Management Procedure</i> to include a requirement for Environmental Management Plans from bulk mineral clients.	
Request for acceptance of a whole product (full-size) DEM analysis method, to provide a more representative result for the coarser gravel-like products, that have less capacity to maintain moisture than finer, more porous products, have been discussed with the DWER Licencing Branch. While requests are made to the mines to provide both the <6.3mm DEM and the full-sized DEM test results, this is not consistently supplied and may be costly. Galaxy Mt Cattlin mine advised SPA in October 2024 that they decided to only test using the standard method.	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 27/11/2025 (within Annual Environmental Quality Report).

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:	18b	Date(s) of non-compliance:	Mt Marion SC4: 13/12/2024, 10/01/2025, 17/01/2025, 24/01/2025, 07/02/2025, 21/02/2025, 28/02/2025, 07/03/2025, 21/03/2025, 28/03/2025, 11/04/2025, 02/05/2025, 09/05/2025, 16/05/2025, 20/06/2025, 04/07/2025, 11/07/2025, 18/07/2025, 25/07/2025. Mt Marion SC6 on 06/06/2025.
Details of non-compliance:			

Section E – Details of non-compliance with licence condition	
Weekly mica representative sample reporting. Spodumene product was received at the premises above 5% by weight mica content from Mt Marion mine site.	
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.	
Nil impact due to enclosed circuit, overhead water spray system used for stockpiled product within the shed and water sprays within the conveyor circuit and shiploader. Monthly reports with the weekly results are received from minesite’s between 1 to 3 months following the reporting month. The products are delivered to the Port and often shiploaded prior to the reports being received by the Port. SPE requests reports to be sent monthly. Refer to Annual Environmental Quality Report 2024-2025 (Section 4.1.2) for further details.	
Cause (or suspected cause) of non-compliance:	
Increased pockets of mica within the product. Difficulty with the existing minesite product processing equipment’s ability to remove increasing levels of mica. A Licence Amendment was submitted to DWER on 20/11/2025 requesting removal of the mica content limit in spodumene as there are no applicable WHSE criteria and for consistency with the Licences of other Ports Licences that allow Category 58 handling of spodumene. The Ports’ dust monitoring network confirms spodumene dust is minimal with maximum concentrations of lithium as PM10 remaining extremely low (<0.01ug/m ³) and presents no significant health risk.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<ul style="list-style-type: none"> • Water spray system used for stockpiled product within the storage shed • Water sprays used within the conveyor circuit and shiploader during shiploading • Conveyors are cleaning following vessel loading. • A truck wash is used at the storage shed (Shed 4) exit. • Road sweeping is carried out at the exit of the storage shed. • Southern Ports have revised its <i>Bulk Mineral Product Quality Management Procedure</i> to include a requirement of Product Quality Management Plans from bulk mineral clients. • Mine sites advised they have been working on optimising/modifying the operation of processing equipment to reduce the mica content. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 27/11/2025 (within Annual Environmental Quality Report).

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:	26 (Table 5, row 1)	Date(s) of non-compliance:	Site 1: 01/05/2025 to 04/05/2025, 13/05/2025, 14/05/2025. Site 2: 22/11/2024 to 09/12/2024, 30/12/2024, 13/05/2025, 14/05/2025. Site 4: 16/10/2024, 17/10/2024.
Details of non-compliance:			
BAM power outages or instrument faults resulted in zero or invalidated 24-hour average PM10 air monitor data. Site 2 between 22/11/2024 and 09/12/2025 experienced an internal power supply fault – spare power supply needed to be sourced. Refer to Annual Environmental Quality Report 2024-2025 (Appendix 1 for Air Monitor Calibration Certificates; Appendix 8 for BAM Daily Average data table and Appendix 9 for PM10 Validated Data Reports) for further details.			
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 expected environmental impact.			
Cause (or suspected cause) of non-compliance:			
Power outage or instrument fault.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Power restored to monitor, or fault rectified.			
Was this non-compliance previously reported to DWER?			

Section E – Details of non-compliance with licence condition


<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 27/11/2025 (within Annual Environmental Quality Report).

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:	26 (Table 5, row 2)	Date(s) of non-compliance:	All HVAS Sites on 30/10/2024. Site 1: 22/05/2025, 21/06/2025. Site 3: 19/07/2025, 19/09/2025
Details of non-compliance:			
<p>HVAS sampling one in every six days – 30/10/2024 sampling day missed due to human error. Filters papers were deployed the following day on 31/10/2024 to make up for the missed sample day.</p> <p>Site 1: 22/05/2025 & 21/06/2025 – rainwater entered sample hood and dropped water and material onto filter paper causing invalid samples. Site 3: 19/07/2025 – human error during training resulted in a collected filter redeployed at another site. Sample was invalid. Site 3: 19/09/2025 – filter paper fell to the ground upon collection at the air monitor site by accident, sample was invalid.</p> <p>Refer to Annual Environmental Quality Report 2024-2025 (Appendix 1 for Air Monitor Calibration Certificates and Appendix 11 for HVAS PM10 results table) for further details.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No expected environmental impact.			
Cause (or suspected cause) of non-compliance:			

Section E – Details of non-compliance with licence condition	
Human error. Equipment failure.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
Site 1 sample lid was replaced on 17/07/2025 by SPE's air monitor maintenance service provider to prevent rain entering the sample lid.	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 27/11/2025 (within Annual Environmental Quality Report).

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 ¹ .			
I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.			
Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:	27/11/2025	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.