



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:	L6022/1988/13	Licence file number:	DEC 11336
Licence holder:	Cable Sands (W.A.) Pty Ltd		
Trading as:	Cable Sands (W.A.) Pty Ltd		
ACN:	009 137 142		
Registered address:	Lot 962 Koombana Drive BUNBURY WA 6230		
Reporting period:	01 / 01 / 2022 to 31 / 12 / 2022		

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
Cat 8. Mineral Sands mining or processing	247,957 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
N/A	N/A

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:	2.2.2	Date(s) of non-compliance:	01/08/20222
Details of non-compliance:			
North Shore MSP Ilmenite stack monitoring results (Particulate Matter) from sample conducted on 1/08/2022 measured 76 mg/m ³ . Licence limit is 70 mg/m ³ .			
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.			
Minimal environmental impact due to temporary nature, short duration and benign nature of the particulate matter.			
Cause (or suspected cause) of non-compliance:			
The ilmenite plant was not running optimally or usually at the time of sampling, with difficulties on start up over the preceding days. The plant was running approximately 4 days (28 July – 2 August).			
The Ilmenite stack was re-sampled on 25th August 2022. The results of the re-sample was 36 mg/m ³ , which was below the licence limits of 70 mg/m ³ .			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Stack filters were changed out and re-sampling arranged once plant running at normal operating conditions.			
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: 11 / 08 / 2022	

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:	October 2022
Details of non-compliance:			
Monthly Total Suspended Particulate (TSP) monitoring was not undertaken during October 2022. A minimum of 4 samples per year are required, however, only 3 samples were taken during 2022.			
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.			
Cause (or suspected cause) of non-compliance:			
Tronox staff unable to correctly calibrate the High Volume Air Samplers.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
External technical specialist engaged to calibrate Hi Vols and provide training to Tronox staff. December 2022 sample was obtained			
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 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:	1.2.4	Date(s) of non-compliance:	December 2022
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Details of non-compliance:

Approximately 30KI of process water was discharged to Bunbury Inner Harbour via the stormwater discharge weir (Emission point reference W1) across three separate events (7th Dec, 12th Dec and 14th Dec). Discharge point only allowed to be used to discharge excess stormwater during a significant rainfall event.

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.

Water quality monitoring was completed prior to each discharge event.

	pH	EC (uS/cm)	TSS (ppm)
7/12/22	7.7	773	64
12/12/22	7.5	750	62
14/12/22	7.9	802	13

The environmental and public health impact of these discharges is expected to be low given:

- The relatively minor volumes of discharges that were spread across 8 days.
- It is expected that the initial dilution of the process water within the coastal marine environmental would be rapid and extensive.
- The relatively strong SE winds during the 3 discharge events (average wind speed ranged from 19.5km/hr to 25.5 km/hr source: BOM) would of contributed to the rapid dilution.
- The process water is sourced from the yarragadee aquifer via an onsite bore and is considered freshwater (EC ranged from 773 to 802). No potential contaminants of concern were expected within the process water.
- Bunbury inner harbour expected to contain lower environmental values compared to nearby coastal areas.
- The discharge area (Bunbury Inner Harbour) is not used for public swimming.

Cause (or suspected cause) of non-compliance:

Misunderstanding by Tronox operators of licence requirements.

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

Section E – Details of Non-Compliance with Licence Condition	
<p>Environmental Hazard reported in the Tronox incident management system. Environmental risk assessment completed to determine potential impacts. Awareness material provided to operation teams. Review and updated site signage regarding stormwater release protocols.</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 particular¹.

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

Signature ² :			
Name: (printed)			
Position:			
Date:	21/2/2023	Date:	16/2/2023
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.