



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 / 2024 to 31 / 12 / 2024		

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	298,801 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:	3.4.1 and 3.4.3	Date(s) of non-compliance:	5 th and 6 th March 2024
Details of non-compliance: Dust exceedance			
Routine ambient air quality monitoring at North Shore Mineral Separation Plan (MSP) on 5 th and 6 th of March 2024 recorded a Total Suspended Particles (TSP) level of 558.61ug/m3 at monitoring point AQ5, exceeding the regulatory licence limit of 260 ug/m3.			
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>The environmental impact is considered to be negligible due to the benign nature of the dust source materials. All HMC products are found naturally in the local environment. The MSP is located in an industrial precinct and there are no residential or other sensitive land uses located to the north, north east or the north west of the MSP.</p>			
Cause (or suspected cause) of non-compliance:			
<p>A combination of production dust, dirt and sand build up around the HiVol, which has become loose with the hot dry weather conditions, and dust from external contaminants. A maximum temperature of 32.6 °C and wind gusts of 35km/h resulted in dust emissions causing an exceedance at monitoring station AQ5.</p> <p>Onsite activities during this period included 18 trucking movements on the 5th March, with one truck unloading material near AQ5. The sweeper truck was operating from 0700 – 1100 on the 5th March which may have generated some dust also.</p> <p>Analysis of the sample found three main substances:</p> <ul style="list-style-type: none"> • Organic material = 32.17% • SiO2 = 32.03% • TiO2 = 31.75% <p>The nearby grain and woodchip operations are considered to be significant sources of dust, particularly when ships are being loaded. Grain was loaded at Berth 3 from 4th March which continued over the monitoring period.</p> <p>Loss on ignition test results show that 32.17% of material on the filter papers was organic in nature indicating some likely contamination from the neighbouring businesses.</p> <p>In addition:</p> <ul style="list-style-type: none"> • Wind gusts were recorded of up to 35km/h, predominately from the ESE and E. • Dust liftoff from upwind product stockpiles and exposed areas have contributed to the dust seen on the filter papers. ~31.75% TiO2, is a product produced by Tronox on site. • Outside of the LOI, ~32.03% of the sample was SiO2, this is a waste product from Tronox operations, however, can also come from the nearby beach. • The area around the HiVol has had significant build up of dust, sand, and dirt. The area is minimally used, and thus this build up has been allowed to accumulate. The record breaking hot summer, combined with no rainfall, has allowed the build up in this area to loosen, and lift of the ground on windy days, which is likely to have been the main cause for this exceedance. 			

Section E – Details of Non-Compliance with Licence Condition			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Offsite dust sources from grain and woodchip loading are beyond the scope of Tronox's influence.</p> <p>There will be additional focus by Tronox to improve dust management onsite including;</p> <ul style="list-style-type: none"> • Clean the dust, sand, and dirt build up around the HiVol, bringing the ground back to the road base that is underneath. • Reducing material in loader buckets on windy days • Maintaining sprinkler system on rear access road • Clearing mineral build up along western perimeter and areas with high fugitive dust emission potential • Use water cart on days where the wind direction and speeds are unfavourable • Repair any damaged dust screens around premise boundary • Investigate use of dust suppressant around premise boundary 			
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: 15 / 3 / 2024	
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:	17 June 2024
Details of non-compliance: Discharge of process water			
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>Process water was discharged into the storm water drain NSSW02 (emission point W1) located near the Administration building carpark.</p> <p>The volume of water discharged was approximately 10 KI. Process water is sourced from the Yarragadee aquifer via an onsite bore and is considered high quality fresh water. There were no contaminants of concern suspected in the process water.</p> <p>The environmental impact is considered to be low given the relatively minor volume of water discharged and the dilution of the material in the harbour.</p> <p>The discharge location is not used for public swimming.</p>			
Cause (or suspected cause) of non-compliance:			
Operational malfunctions within the processing facility.			

Section E – Details of Non-Compliance with Licence Condition	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
The ilmenite and secondary wet plants were shut down to prevent further flooding.	
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 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 :			
Name: (printed)			
Position:			
Date:	03 / 24 / 2025	Date:	03 / 24 / 2025
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.