



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:	L6341/1988/10	Licence file number:	DER2014/001534-1
Licence holder name:	Simcoa Operations Pty Ltd		
Trading as:	As Above		
ACN:	009 064 653		
Registered business address:	973 Marriott Rd WELLESLEY WA 6233		
Reporting period:	1/01/2022 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 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
Metal Smelting or Refining (Category 44) (Silicon)	45,271 Tonnes
Char manufacturing (Category 37)	23,556 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
Wastewater discharged to Kemerton Titanium	40,229 m3

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		
dioxide processing plant			
Wastewater discharged to land	18,637 m3		
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; Table 3.3.1; Monitoring Point L1	Date(s) of non-compliance:	2022
Details of non-compliance:			
Potential non-compliance due to lack of information on whether there were any overflows at monitoring point L1 in 2022. This resulted in no weekly samples being collected for water quality analysis at L1 in the event of an overflow.			
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.			
Simcoa does not believe that any material or serious environmental harm has occurred as a result of the oversight. The quality of water discharged from L1 is essentially the same as L3 as the water originates from the same Settling Pond. Water quality results are available for L3 for 2022.			
Cause (or suspected cause) of non-compliance:			
Due to staff changes at the Kemerton Silicon Smelter the requirement for undertaking weekly water quality monitoring at L1 in the event of an overflow was overlooked. It is not known if there were any overflows at L1 in 2022.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Simcoa has commenced the development of a compliance calendar that will give more visibility within the organisation to environmental compliance requirements. Environmental awareness training for relevant site personnel is planned.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

Section E – Details of non-compliance with licence condition	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 31/03/2023

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; Table 3.3.1; Monitoring Point L2	Date(s) of non-compliance:	2022
Details of non-compliance:			
Potential non-compliance due to lack of information on whether there were any flows at monitoring point L2 in 2022. This resulted in no weekly samples being collected for water quality analysis at L2 in the event of a flow.			
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.			
Simcoa does not believe that any material or serious environmental harm has occurred as a result of the oversight. The quality of water discharged at L2 would have been similar to previous years as there were no significant changes in the raw materials stored on the wood block drying pad.			
Cause (or suspected cause) of non-compliance:			
Due to staff changes at the Kemerton Silicon Smelter the requirement for undertaking weekly water quality monitoring at L2 in the event of a flow was overlooked. It is not known if there were any flows at L2 in 2022.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Simcoa has commenced the development of a compliance calendar that will give more visibility within the organisation to environmental compliance requirements. Environmental awareness training for relevant site personnel is planned.			
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: 31/03/2023		

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; Table 3.5.1; Monitoring Point AQ1 & AQ2	Date(s) of non-compliance:	November 2022
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Details of non-compliance:

No ambient air quality monitoring data (TSP) is available for locations AQ1 and AQ2 for November 2022. Ambient air quality monitoring at locations AQ1 and AQ2 was undertaken in May 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.

Simcoa does not believe that any material or serious environmental harm has occurred as a result of the oversight. Historic ambient air quality monitoring at locations AQ1 and AQ2 have indicated that TSP concentrations are low.

Cause (or suspected cause) of non-compliance:

Due to staff changes at the Kemerton Silicon Smelter the requirement for undertaking ambient air (TSP) quality monitoring at locations AQ1 and AQ2 in November 2022 was overlooked.

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

Simcoa has commenced the development of a compliance calendar that will give more visibility within the organisation to environmental compliance requirements. Environmental awareness training for relevant site personnel is planned.

Was this non-compliance previously reported to DWER?

Yes, and

<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 31/03/2023

Section F – Declaration

Department of Water and Environmental Regulation

I 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 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:	Vice President. Site Services and Marketing	Position:	
Date:	24 March 2023	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.