



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:	1/01/2023 to 31/12/2023		

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); andsign 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; andsign 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)	43,424 Tonnes
Char manufacturing (Category 37)	23,175 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	39,493 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	32,379 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:	January to March 2023
Details of non-compliance:			
No weekly samples were collected for water quality analysis at L1 during periodic overflows from the settling pond between January and March 2023.			
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 this period in 2023.			
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 between January and March 2023. During the same period, it was not possible to transfer wastewater to the Kemerton Titanium Dioxide Processing Plant, so the water level in the Settling Pond was higher than normal.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Sampling requirements have been reviewed with relevant site personnel.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

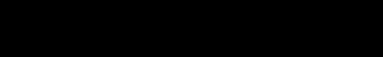
Section E – Details of non-compliance with licence condition	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 31/03/2024

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:	April to July 2023
Details of non-compliance:			
No weekly samples were collected for water quality analysis at L2 when the Infiltration Pond overflowed after heavy rainfall on 25 April 2023, 5 June 2023, 12 June 2023 and 3 July 2023. Samples were collected for these events from an incorrect sampling point. Samples were collected from the correct sampling point for the subsequent rainfall events that resulted in the Pond overflowing in 2023.			
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:			
Site personnel responsible for collecting samples from the infiltration pond misunderstood where the sampling point was located.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Sampling requirements have been reviewed with relevant site personnel.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes and			
<input type="checkbox"/> Reported to DWER verbally	Date: / /		
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 31/03/2024		

Section F – Declaration

I 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 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:	20 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.