



## 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](mailto: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:	L8008/2004/3	Licence file number:	DER2014/000631
Licence holder name:	Ravensthorpe Nickel Operations Pty Ltd		
Trading as:	Ravensthorpe Nickel Operations		
ACN:	092506584		
Registered business address:	Level 1, 24 Outram Street, West Perth, WA 6005		
Reporting period:	01/05/2020 to 30/04/2021		

### 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
5. Processing or beneficiation of metallic or non-metallic ore	5,756,699 T (dry)
31. Chemical manufacturing	981,036 T H <sub>2</sub> SO <sub>4</sub>
52. Electric power generation	212,986 MW

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
54 Sewage Facility	71.14 m <sup>3</sup> per day

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:	1.3.2	Date(s) of non-compliance:	9 <sup>th</sup> February 2021
Details of non-compliance:			
HV wash down bay pond overflowed outside of licenced containment infrastructure.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No impact expected.			
Cause (or suspected cause) of non-compliance:			
Stormwater fill valve for the HV wash pad left open. Supply tanks overflowed causing increased flow to washpad pond.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Supply valve closed and procedure for managing water inflows to the pond confirmed with contractor.			
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: 10/ 02 / 2021	



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:	4.3.1	Date(s) of non-compliance:	13 <sup>th</sup> and 15 <sup>th</sup> February 2021
Details of non-compliance:			
Southern stormwater pond (Pond 19 - Stormwater South – Bottom) liner failure where western wall liner has come free of key trench and slumped and ripped. SAP process water pond (Pond 18 - Beneficiation ponds) liner failure.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No impact expected.			
Cause (or suspected cause) of non-compliance:			
Southern stormwater pond liner failure apparently caused by normal wear and tear. SAP process water pond liner failure caused by thickener overflow breaking off, causing turbulent water to break through the liner.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Ponds removed from service and repair plan developed for implementation. Form N1 Part B submission pending.			
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/ 02 / 2021	

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:	1.3.2	Date(s) of non-compliance:	1 <sup>st</sup> March 2021
Details of non-compliance:			
Tailings pipeline spill outside of licenced containment infrastructure.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
Suspected minor vegetation impact in creekline, expected to recover over time. Form N1 with accompanying map has been supplied.			
Cause (or suspected cause) of non-compliance:			
Pipeline corrosion.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Tailings discharge ceased and transferred across to backup line. Tailings material banded using sand, cleaned up and disposed to TSF. Tailings line repaired and full inspection of line undertaken. Form N1 Part B submission pending.			
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: 01/ 03 / 2021	



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:	1.3.2	Date(s) of non-compliance:	18 <sup>st</sup> April 2021
Details of non-compliance:			
Southern stormwater pond (Pond 20 – Stormwater South – Top) overflowed outside of licenced containment infrastructure.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
Suspected minor vegetation impact in creekline, expected to recover over time. Form N1 with accompanying map has been supplied.			
Cause (or suspected cause) of non-compliance:			
Water management system overload during dredging operations on the buffer ponds.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Dredging ceased and water return back to buffer ponds from stormwater pond resumed. Drain out pump started to reduce level in stormwater pond. Automatic level sensor system being developed to prevent re-occurrence. Form N1 Part B submission pending.			
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: 01/ 03 / 2021	

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:	3.6.2 (a)	Date(s) of non-compliance:	May 2020
Details of non-compliance:			
During May the weather station was available for 39% of the month. The weather station was operational however an IT system firewall issue resulted in it being unavailable for use.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No impacts actual or suspected occurred due to the weather station being unavailable.			
Cause (or suspected cause) of non-compliance:			
An IT system firewall issue with the weather station software resulted in it being unavailable for use.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Firewall issues were rectified and the weather station was available 100% for the period June 2020 to April 2021.			
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:	3.5.1	Date(s) of non-compliance:	2020 – 2021 reporting period
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Details of non-compliance:

Table 3.5.2  
 (1) Monitoring bore MB22 not sampled in January 2021 and April 2021 as per licence requirement.  
 (2) Monitoring bore MB2 not sampled for the 2020 - 2021 reporting period as per licence requirement.  
 (3) TSF2 embankment piezometers PZ7, PZ8, PZ11 and PZ12 not sampled in April 2021 as per licence requirements.

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 resulted from these non-compliances.

Cause (or suspected cause) of non-compliance:

(1) MB22 was impacted by conveyor construction works in late 2020 and has not yet been repaired.  
 (2) MB02 was dry for the reporting period and has consistently been dry for the life of the operation so far.  
 (3) TSF2 lift construction works caused PZ7, PZ8, PZ11 and PZ 12 to temporarily be taken offline.

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

(1) MB22 will be assessed and repair or replacement undertaken.  
 (2) MB02 will continue to be monitored and will be sampled should SWL levels become sufficient.  
 (3) Monitoring of PZ 7, PZ8, PZ11 and PZ12 will recommence once construction works are completed.

Was this non-compliance previously reported to DWER?

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:	3.2.2	Date(s) of non-compliance:	December 2020
Details of non-compliance:			
Stack sampling undertaken in December 2020 for the acid plant main stack was completed as required, but was unable to be undertaken in accordance with AS 4323.1.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact resulted from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Pending a full inspection, the ladder-way to the sampling port of the acid plant main stack had been deemed unsafe to traverse due to corrosion and was out of service at the time of sampling. An alternative sampling location was determined for the sampling effort. Despite the flow characteristics being very similar to the main sampling port the location was still deemed to be non-compliant with the Australian Standard.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Subsequent inspection of the acid plant ladder-way has confirmed that it is structurally sound and that sampling activities can recommence as normal.			
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 particular<sup>1</sup>.

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

Signature <sup>2</sup> :	[Redacted]	Signature:	[Redacted]
Name: (printed)	[Redacted]	Name: (printed)	[Redacted]
Position:	[Redacted]	Position:	[Redacted]
Date:	[Redacted]	Date:	[Redacted]
Seal (if signing under seal):			

<sup>1</sup> 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.

<sup>2</sup> 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.