



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:	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:	01/05/2021 to 30/04/2022		

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)
<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
5. Processing or beneficiation of metallic or non-metallic ore	7,126,380 T (dry)
31. Chemical manufacturing	881,103 T H ₂ SO ₄
52. Electric power generation	23.59 MW in aggregate

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	120.5 m ³ 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:	1.3.3	Date(s) of non-compliance:	23 rd June 2021
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Details of non-compliance:

HV wash down bay pond overflowed outside of licenced containment infrastructure due to unexpected heavy rainfall event. Required freeboard not maintained.

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 impact expected. Overflow heavily diluted by rainfall runoff. Confirmed through sampling.



Cause (or suspected cause) of non-compliance:

Pond skimmer pump not operating automatically allowing water to build up in the pond and overflow. Float switch found to be faulty and replaced.

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

Cleanaway vac truck mobilized to site to lower pond level immediately. Skimmer pump started manually to lower pond level to required freeboard. Skimmer pump system repaired to restore automatic operation.

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:	3.5.1	Date(s) of non-compliance:	July 2021
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Details of non-compliance:

Dust deposition in DDG11 for July exceeded licence target of 4g/m³/month.

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 impact expected.



Cause (or suspected cause) of non-compliance:

Unclear. No specific cause could be determined however evidence suggests it was not mining related.

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

Investigated possible causes however no corrective action plan could be determined in this case.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /

Reported to DWER in writing

Date: 26/08/2021

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:	3.5.1	Date(s) of non-compliance:	February 2022
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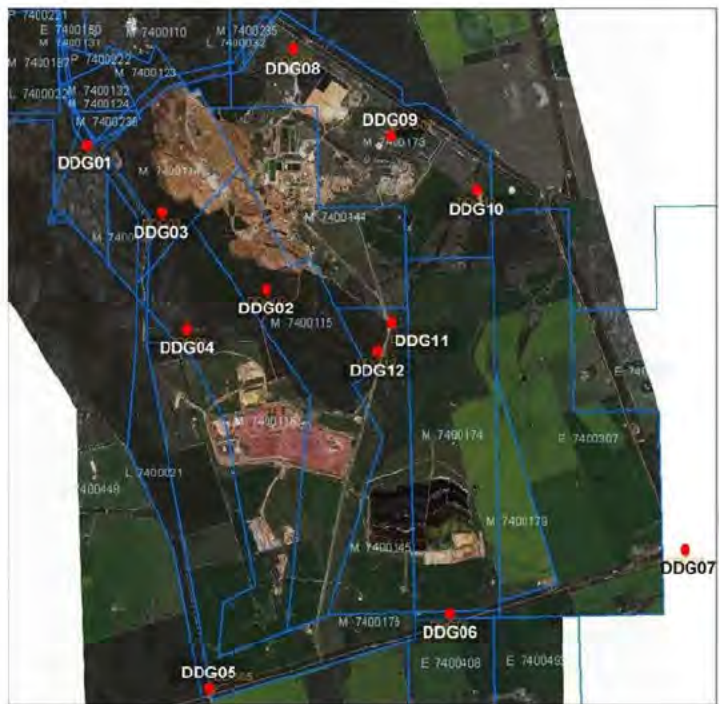
Details of non-compliance:

Dust deposition in DDG06 and DDG11 for February exceeded licence target of 4g/m³/month.

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 impact expected.



Cause (or suspected cause) of non-compliance:

Unclear. No specific cause could be determined however evidence suggests it was not mining related.

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

Investigated possible causes however no corrective action plan could be determined in this case.

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: 11/04/2022

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:	3.5.2	Date(s) of non-compliance:	July 2021
Details of non-compliance:			
Target exceedance report not submitted to DWER within the required timeframe of 28 days of becoming aware of the exceedance.			
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 impact expected.			
Cause (or suspected cause) of non-compliance:			
Administrative error led to report not being submitted on time.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Required action to report to DWER to be entered into INX as a part of the incident reporting process so that reminder emails are sent regularly.			
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: 30/ 09 / 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:	13 April 2022
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Details of non-compliance:

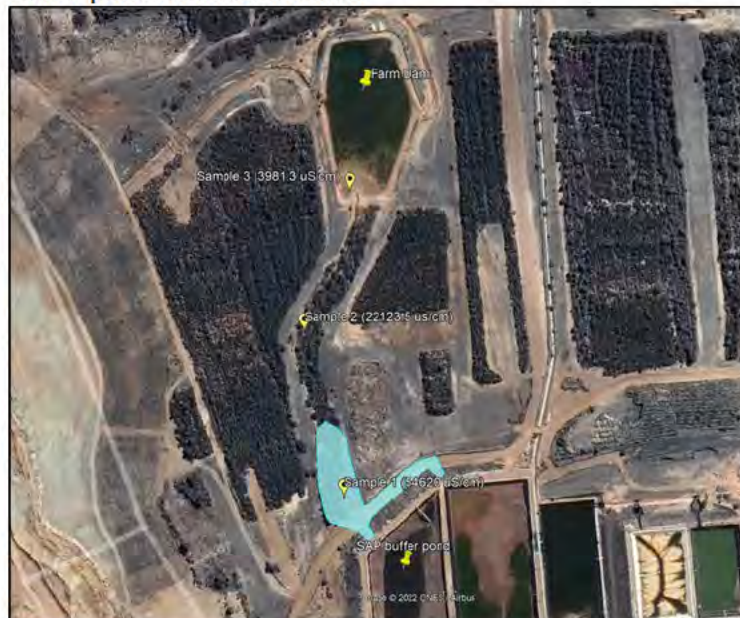
Saprolite (SAP) buffer pond overflowed and southern stormwater pond had to be lowered by pumping and controlled water release resulting in water release outside of licenced containment infrastructure due to unexpected very heavy rainfall event in April 2022.

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 impact expected. All water heavily diluted by rainfall runoff. Confirmed through sampling. SAP Buffer pond overflow event contained onsite within site sedimentation dam (Farm Dam).

Buffer pond overflow location



Section E – Details of non-compliance with licence condition

Southern storm water pond controlled discharge location



Cause (or suspected cause) of non-compliance:

Rainfall storm water runoff exceeded the pumping capacity of the pond pumping systems.

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

Site water management and pumping system review to minimize risk of site ponds exceeding freeboard requirements. Incidents reported to DMIRS.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /

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:	1.3.3	Date(s) of non-compliance:	13 April 2022
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Details of non-compliance:

HV stormwater pond (SP3), saprolite buffer pond and southern stormwater pond freeboard requirements not met due to unexpected very heavy rainfall event in April 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 impact expected. All released water heavily diluted by rainfall runoff. Confirmed through sampling.

HV stormwater pond overflow location



See above for SAP buffer pond and southern stormwater pond location plans

Cause (or suspected cause) of non-compliance:

Rainfall stormwater runoff exceeded the pumping capacity of the pond pumping systems and subsequently overflowed.

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

Site water management and pumping system review to minimize risk of site ponds exceeding freeboard requirements. Incidents reported to DMIRS.

Was this non-compliance previously reported to DWER?

Yes, and

<input type="checkbox"/> Reported to DWER verbally	Date: / /
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<input type="checkbox"/> Reported to DWER in writing	Date: / /
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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:	2021 – 2022 reporting period
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Details of non-compliance:

Table 3.5.2

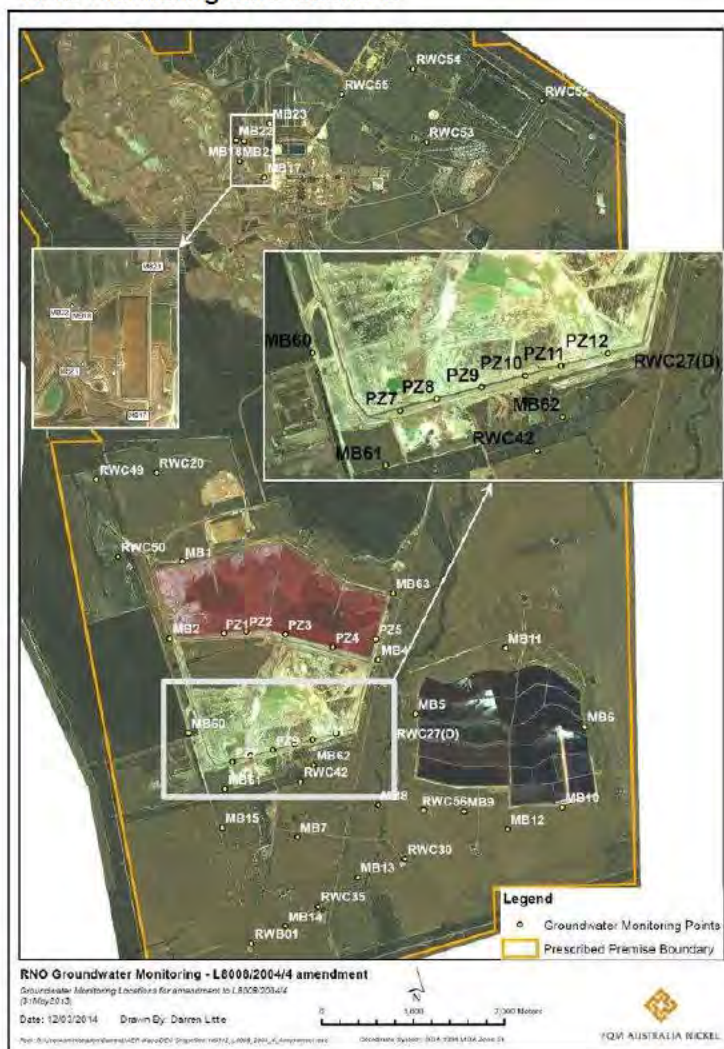
- (1) Monitoring bore MB22 not sampled in October 2021, January 2022 and April 2022 as per licence requirement.
- (2) Monitoring bore MB2 not sampled for water quality for the 2021 - 2022 reporting period as per licence requirement.
- (3) Monitoring bores RWC30 and RWC56 not sampled in July 2021.
- (4) Monitoring bore RWC20 not sampled in April 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 resulted from these non-compliances.

RNO monitoring bore locations



Section E – Details of non-compliance with licence condition	
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) RWC30 and RWC56 were temporarily not accessible during the July 2021 sampling run. (4) RWC20 was temporarily not accessible during the April 2022 sampling run.	
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. A monitoring bore drilling rig is scheduled to be onsite in September 2022. (2) MB02 will continue to be monitored and will be sampled should SWL levels become sufficient. (3) Access to RWC30 and RWC56 has been restored and is not anticipated to be an issue going forward. (4) Access to RWC20 has been restored and is not anticipated to be an issue going forward.	
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 :	[Redacted]	Signature:	[Redacted]
Name: (printed)	[Redacted]	Name: (printed)	[Redacted]
Position:	General Manager	Position:	Superintendent, Environmental
Date:	29/06/2022	Date:	29/06/2022
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.