



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details

Licence number:	L8008/2004/3	Licence file number:	DER2014/000631
Licence holder:	FQM Australia Nickel Pty Ltd		
Trading as:			
ACN:	135 761 465		
Registered address:	Level 2, 18-32 Parliament Place, West Perth, WA 6000		
Reporting period:	01 / 05 / 2024 to 30 / 04 / 2025		

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
Category 5: Processing or beneficiation of metallic or non-metallic ore	Zero tonnes of nickel ore processed during relevant reporting period
Category 31: Chemical manufacturing	Zero tonnes of acid produced during relevant reporting period
Category 52: Electric power generation	Average 1.8 MW produced during reporting period

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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
Category 54: Sewage Facility	14.7m ³ per day

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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:	5	Date(s) of non-compliance:	06/05/2024
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Details of non-compliance:

Water accumulating under Raw Water Pond liner.

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.



Figure 1: Reduced water level of the raw water dam



Figure 2: Water pumped into the raw water dam

Location is at Figure 2a, Map Reference 6 of May 2025 amended version of L8008/2004/3 (current version).

Nil to negligible actual observed impact due to leaked water being pumped out into suitable plant containment. Nil salt scalding or vegetation mortality has been observed in the 12 months that followed the incident. No pooling of water that would suggest ongoing seepage is evident.

Cause (or suspected cause) of non-compliance:

During an inspection it was observed that a bubble formed in the pond, indicating the potential for water under the liner. It is suspected that the liner join underneath the discharge spigot may have been damaged by the continued high velocity water impact.

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Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Water level of the pond reduced below suspected tear, water which had leaked under the tear was bled into secure containment and pond level to be maintained below 60% until pond is rectified.</p> <p>When raw sea water demand reduces during care and maintenance, the pond will be pumped down to affect repair of the liner. This is likely to be completed prior to the 2025/2026 summer season.</p>	
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: 07/05/2024

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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:	5	Date(s) of non-compliance:	06/05/2024
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Details of non-compliance:

Rain water spilled over spillway into the adjacent environment

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.



Figure 1: Overflow location and receiving environment

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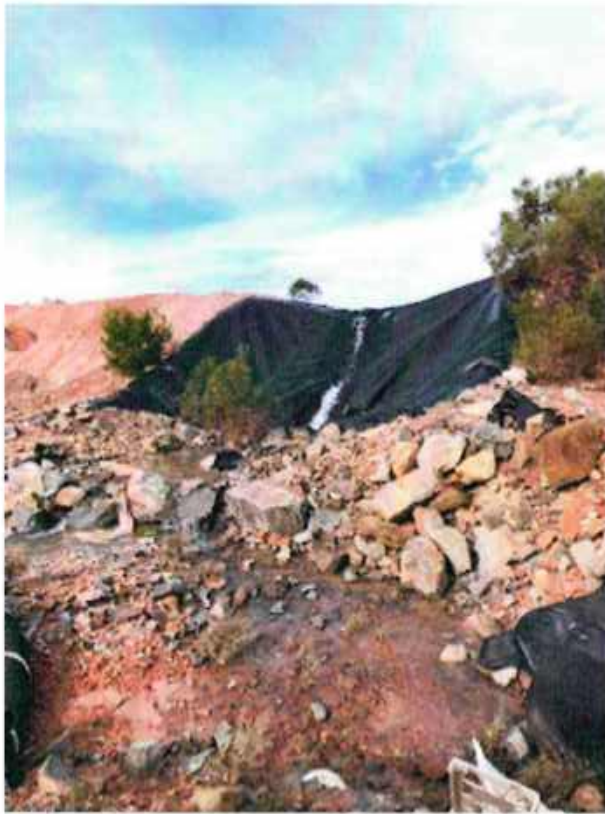


Figure 3: Overflow point

Location is at Table 3 Map reference 32 and Condition 8 of L8008 as at time of incident.

Cause (or suspected cause) of non-compliance:

There are minimal users of the water which is inadvertently collected during rain events in this pond, which drives the rapid decrease of freeboard.

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

Water quality test results are benign measured against ANZECC (2000) Guideline for Fresh and Marine Water Quality – livestock drinking water guidelines.

To address the low use issue, the dam will be pumped more frequently to RNO plant containment and regular inspections will be done to check the freeboard.

Was this non-compliance previously reported to DWER?

☒ Yes, and

☐ Reported to DWER verbally

Date: 07/05/2024

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<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 07/05/2024
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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:	7	Date(s) of non-compliance:	20/08/2024
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Details of non-compliance:

Water has spilled over the Turkeys Nest emankments and into unbunded environments surrounding it.

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.

Nil to negligible impact observed.



Figure 1: Overflow location and receiving environment

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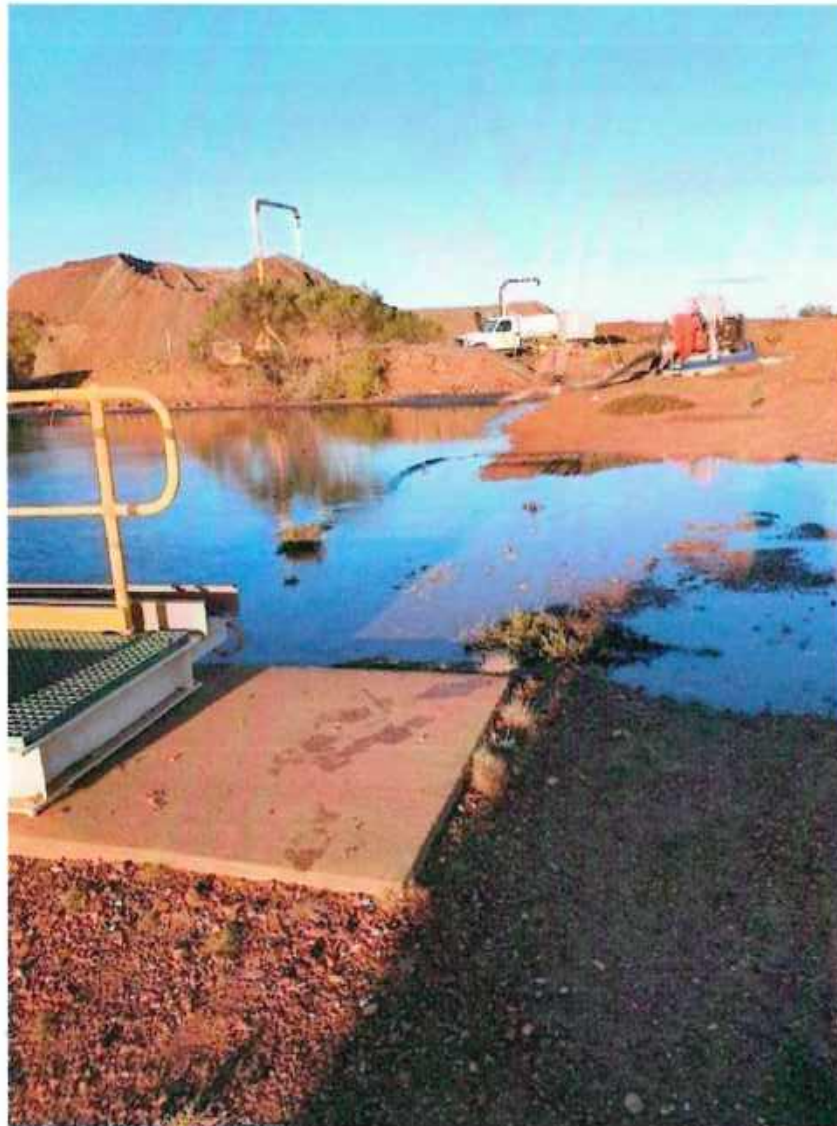


Figure 3: Overflow point facing West

Actual location is Figure 2a, Map Reference 19 on the May 2025 amended version of L8008/2004/3

Cause (or suspected cause) of non-compliance:

Storm water and surface runoff is collected in the HV Workshop Storm Water Pond (Pond 12) and pumped to the Mining Turkeys Nest. Water stored in the Mining Turkeys Nest is then pumped into water carts for use as a dust suppressant on haul roads, ROM pads, car parks and other trafficable mining areas.

Since transitioning RNO into care and maintenance, there has been no end user of the water which was automatically pumped to the turkeys nest and it was not inspected on a daily basis prior to the rain event which preceded the incident.

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Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>The automatic transfer of water from the workshop pond to the turkeys nest has been disabled in the RNO data control system to prevent such a transfer without manual intervention. This will cease the filling of the pond without an end user.</p> <p>The water was drained to a suitable sump to allow permissible freeboard to be attained.</p> <p>The turkeys nest will not be used for water transfer purposes going forward.</p>	
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: 20/08/2024

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:		Date(s) of non-compliance:	04/09/2024
Details of non-compliance:			
Diesel has spilled from the fuel tank of DG7 into the surrounding plant area and storm water drainage infrastructure			
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>			
All diesel flow to DG 7 was halted immediately. Limestone scats were used to restrict the downstream flow of diesel through stormwater infrastructure. Cleanup of pooled diesel into IBCs was undertaken, and contaminated roadbase dug out for storage and later decontamination.			

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Figure 1: Location of DG7 relative to containment infrastructure per License L8008/2004/3

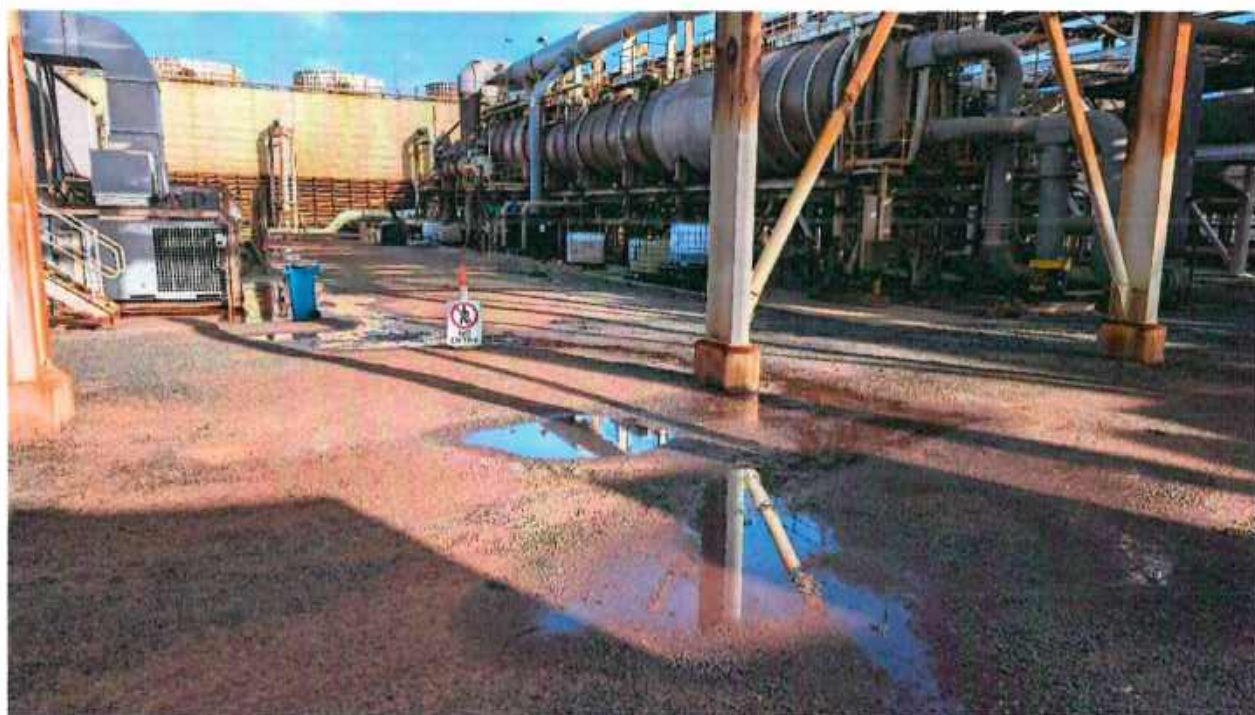


Figure 4: General view of fuel spillage path through water treatment area of the RNO plant toward drainage infrastructure

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Cause (or suspected cause) of non-compliance:				
<p>DG7 is fitted with an internal, self-bunded fuel tank which may be refilled by an automatic filler system fed by a header circuit which supplies diesel to all DG's. Maintenance was carried out on DG7 during day shift on 03/09/2024 and the unit was not re-started as it is the backup generator in case of blackout.</p> <p>The high level sensor on the DG7 fuel tank failed and this resulted in the fuel supply continuing to run while the unit was not operational. Diesel continued to spill from the breather port on the fuel tank until it was identified at the start of the subsequent shift, the morning of 04/09/25 whereafter the valve was closed immediately.</p>				
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:				
<p>The high level sensor was replaced on DG7 and all fuel transfer systems on DGs are checked for faults after routine maintenance related such as this.</p>				
Was this non-compliance previously reported to DWER?				
<input checked="" type="checkbox"/> Yes, and				
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"><input type="checkbox"/> Reported to DWER verbally</td> <td style="width: 50%;">Date: / /</td> </tr> <tr> <td><input checked="" type="checkbox"/> Reported to DWER in writing</td> <td>Date: 04/09/2024</td> </tr> </table>	<input type="checkbox"/> Reported to DWER verbally	Date: / /	<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 04/09/2024
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<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 04/09/2024			

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:	7 & 8	Date(s) of non-compliance:	14/04/2025
Details of non-compliance:			
<p>HV workshop, SML Stormwater and SRSF Ponds overtopping. The incident relates to Conditions 7 & 8, Table 3, Map reference of three ponds - Pond 12, 26 and 32. It was notifiable under Condition 8 of the extant L8008/2004/3 version as at time of the incident (since superseded)</p>			
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>			

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Nil to negligible actual impact due to the water which was inadvertently discharged to land being fresh and clean in nature. Some minor water logging consistent with broader environmental condition after a considerable rain event.



Figure 1: Overflow location and receiving environment

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Cause (or suspected cause) of non-compliance:

All three bodies of water catch significant quickflow in the event of a high rainfall event, such as the 70mm in 24 hours which preceded this incident. During care and maintenance, there is little demand for fresh water in the process system whereas in the past, considerable water could be consumed within the plant. This has resulted in capacity of these ponds being rapidly and unforeseeably overwhelmed, as the actual rain received was well in excess of the forecast at the time, which predicted sub 20mm for that period.

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

SML: This stormwater pond is the end of the line, with no return pumping infrastructure. This leaves no other usage or method of freeboard reduction other than for haul road dust suppression, which is not required during winter care and maintenance. To prevent future occurrence, a return line and pumping set up has been scoped to effectively dewater this dam without water carts.

HV Workshop: Due to the previous Mining Turkeys Nest incident, automatic pumping of this pond based on level sensor was ceased to avoid another Turkeys Nest freeboard incident. The externality of that process change has been this freeboard incident, which was diverted into stormwater drains before entering the creek. To prevent future occurrence, this pond will be checked more frequently and water pumped to suitable containment within the RNO process plant if necessary.

SRSF: To address the low use issue, the dam will be pumped more frequently to RNO plant containment and regular inspections will be done to check the freeboard.

Was this non-compliance previously reported to DWER?

☒ Yes, and

☐ Reported to DWER verbally


Date: / /

☒ Reported to DWER in writing

Date: 15/04/2025

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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:	30/06/2025	Date:	30/06/2025
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.

