

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:	L8435/2010/3	Licence file number:	2011/000299
Licence holder name:	GSM Mining Company Pty Ltd		
Trading as:	GSM Mining Company Pty Ltd		
ACN:	165 235 030		
Registered business address:	Level 5, 50 Colin Street, West Perth, Western Australia, 6005		
Reporting period:	01/01/2020 to 31/12/2020		

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); and • sign 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; 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	1,718,786 tonnes/year

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
6	7,025,978 kL/year
54	213 m ³ /day
64	3,873 tonnes/year

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:	3.6.1	Date(s) of non-compliance:	21/05/2020
Details of non-compliance:			
<p>The in-field pH at the TSF Seepage Discharge Trench was recorded as 8.04, exceeding the licence limit of 8.</p> <p>The laboratory-analysed pH from the sampling event was 7.76 and the breach was not reported following review of these results. However, it is acknowledged that in-field analysis of pH is permitted in the licence where laboratory holding times cannot be met, and it is the in-field pH used to assess compliance in this instance.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>No environmental impact resulted from the elevated pH recorded in May. The TSF Seepage Water is returned to the processing plant, where it undergoes further chemical changes. Excess water is discharged to Goanna Pit, however, there were no breaches of the pH licence limits at this sample point throughout the reporting period.</p> <p>Quarterly monitoring following the exceedance showed the pH returned to neutral; 7.04 and 7.09 recorded in August and November respectively.</p> <p>No impacts to wildlife were identified via daily wildlife monitoring of the tailings dam, seepage trench and process water pond, nor GSM's internal incident reporting protocols.</p>			

Cause (or suspected cause) of non-compliance:	
<p>Review of reagent quantities in May do not suggest that the process ran at a higher pH value. Similarly, daily operational monitoring of pH at the TSF were not elevated leading up to the exceedance event.</p> <p>Historic results demonstrate that pH of seepage water in the trench does fluctuate between the lower and upper licence limits. As the laboratory-analysed pH did not show a spike in May, a possible cause of the reading is the calibration of the probe prior to the sampling event.</p>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>No action was required in response to the pH limit breach to mitigate adverse effects. The seepage water continued to be monitored in accordance with licence conditions, and the pH was between licence limits in the subsequent quarterly monitoring events.</p> <p>Internal processes have been amended to ensure in-field pH results are assessed for compliance against licence limits, as opposed to laboratory results. The monitoring equipment used to take the in-field reading was serviced and calibrated in October 2020, and is re-calibrated prior to each quarterly sampling event.</p>	
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

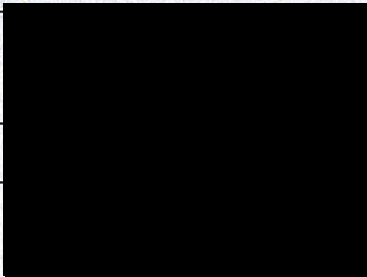

Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.

Condition no:	1.2.1	Date(s) of non-compliance:	Since installation
Details of non-compliance:			
<p>An internal audit of pipeline controls identified some locations within the hypersaline and effluent pipeline network that are not:</p> <ul style="list-style-type: none"> (a) equipped with telemetry systems and pressure systems along pipelines to allow the detection of leaks and failures; (b) equipped with automatic cut-outs in the event of a pipeline failure; or (c) provided with secondary containment sufficient to contain any spill for a period equal to the time between routine inspections. <p><u>Hypersaline:</u> The western outfall of dewatering discharge from the Wallaby operation is equipped with flow meters, however are not connected to a telemetry system. Secondary containment is present for the dewatering bores and the majority of the length of the discharge pipe, however there are stretches of exposed pipe which requires additional bunding to provide appropriate secondary containment.</p> <p><u>Sewage:</u> Whilst the wastewater treatment plant is equipped with telemetry systems, the pipelines transporting effluent are not. The majority of the pipeline from the Wallaby operation to the wastewater treatment plant is within secondary containment and is inspected twice</p>			

Section E – Details of non-compliance with licence condition	
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daily. However, stretches of pipeline from other buildings are buried or placed on the surface with no or insufficient bunding.	
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.	
There has been no environmental impact as a result of the absence of these prevention pollution controls, as there have been no damage to the pipelines during the reporting year.	
Cause (or suspected cause) of non-compliance:	
Original construction and installation of pipelines and associated infrastructure not aligned with licence condition.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
Routine inspections of the pipeline network are conducted to detect spills where there is no telemetry system established. An improvement plan to construct or reinstate secondary containment to be implemented.	
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:	3.7.1	Date(s) of non-compliance:	Multiple
Details of non-compliance:			
Table 3.7.1 requires Production Bore 5 (PB5), located downstream of TSF Cell 3, to be monitored quarterly for standing water level (SWL) and a suite of water quality parameters. All water quality samples were collected and analysed in accordance with licence requirements, however SWL was not recorded quarterly.			
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 the absence of monitoring SWL at PB5 in 2020. The production bore was operated effectively throughout the year, and its contribution to the management of seepage is described in Appendix I of the Annual Environmental Report.			

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Cause (or suspected cause) of non-compliance:	
The configuration of pump infrastructure and casing at the top of the bore does not enable the lowering of a water level meter to measure SWL.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
A maintenance request has been submitted to provide short term sample point for SWL. A thorough review of the setup will also be conducted to review long term sample point solutions.	
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 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 :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:	28/02/2021	Date:	28/02/21
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.