

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:	2011/000299-3
Licence holder name:	GSM Mining Company Pty Ltd		
Trading as:	GSM Mining Company Pty Ltd		
ACN:	165 235 030		
Registered business address:	Level 4, 235 St Georges Terrace, Perth, Western Australia, 6000		
Reporting period:	01/01/2023 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); 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	1,759,805 tonnes/year

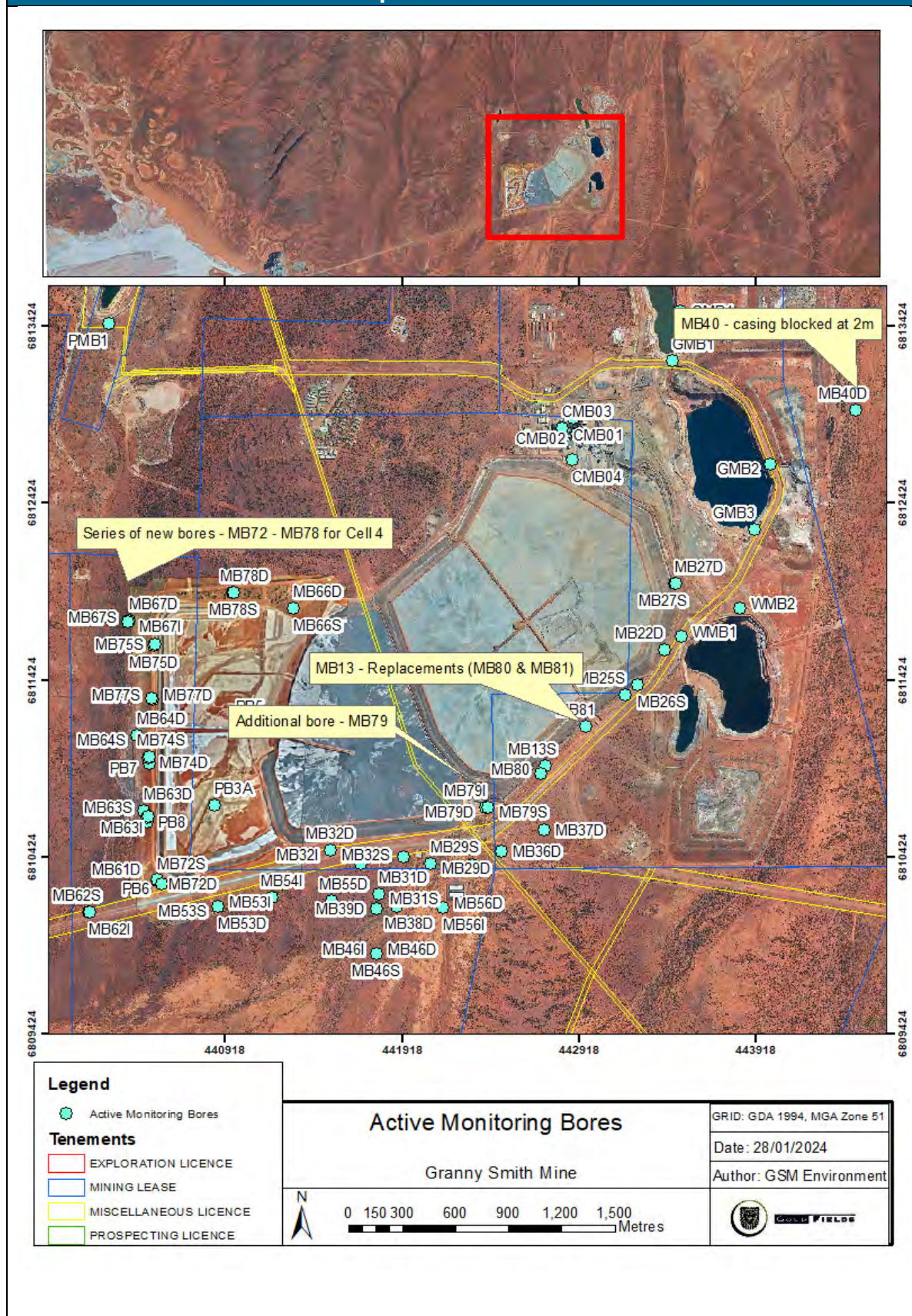
Section D – Statement of actual Part 2 waste discharge quantity

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	6,928,424 kL/year
54	149.94 m ³ /day
64	2,916 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:	28	Date(s) of non-compliance:	Multiple
Details of non-compliance:			
<p>The following monitoring bores were partially non-compliant to the monitoring schedule outlined in Table 17 of the licence;</p> <ul style="list-style-type: none"> • MB13, bore damaged in 2021; a replacement bore was drilled in Q3 2023, and sampled in Q4 2023, • MB40, blockage in bore, single sample taken in Q4 2023, • Numerous MB decommissioned in TSF Cell 4 construction. 			
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>			
<p>There is no suspected environmental impact of the non-compliance, as while the prescribed monitoring program schedule was not adhered to, requiring quarterly samples for level and quality, samples were taken, and the levels have been stable for extended periods.</p> <p>A series of monitoring bores were drilled in Q3 2023 as replacements for those decommissioned as part of the buttress construction on TSF Cell 1 and TSF Cell 2, in 2021 and 2023 respectively. This included additional nested bores at the interface between TSF Cell 1 and TSF Cell 3, and shallow wells to replace MB13 and MB25. The map below shows the location of the replacement and additional bores, in relation to the broader groundwater monitoring network.</p>			

Section E – Details of non-compliance with licence condition



Cause (or suspected cause) of non-compliance:	
<p>A number of monitoring bores were decommissioned for the construction of TSF Cell 4, and were replaced by a series of new monitoring bores drilled in 2021, with background data collected since then. The decommissioned bores will be removed from the licence in a forthcoming licence amendment.</p> <p>In 2021, the TSF Cell 1 was reinforced with rock waste forming a buttress, as part of the construction process, MB13 was decommissioned due to its location within the footprint of the buttress. A replacement bore was drilled, and a new name assigned to account for the change in location, the addition of the new monitoring bores will be included in the next licence amendment, associated with TSF Cell 4.</p> <p>The monitoring well MB40 has been blocked since 2021, yet a single sample in Q4 was obtained. This bore will be proposed to be removed from the program in the licence amendment being prepared for the TSF Cell 4 project, as its distance from source and receptor make it of limited value to the program.</p>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Replacement monitoring bores have been drilled and are included in the monitoring program, a licence amendment is soon to be submitted in relation to the TSF Cell 4 project, which will include removal of all bores decommissioned for its construction and the addition of the recently installed monitoring wells.</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: 28/02/2023 - AER

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:	25	Date(s) of non-compliance:	Q1 2023
Details of non-compliance:			
<p>The following monitoring bores were partially non-compliant to the monitoring schedule outlined in Table 14 of the licence;</p> <ul style="list-style-type: none"> GMB1-4 <p>The dissolved metals analytical suite was inadvertently missed on the laboratory analysis, with all remaining analysis complete to schedule.</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>			

Section E – Details of non-compliance with licence condition

There is no suspected environmental impact of the non-compliance, levels remain stable for dissolved metals and the monitoring has been completed to schedule for the remainder of the reporting period.

Internal processes have been changed to reduce future risk of repeat events, with the chain of custody (CoC) being revised to avoid confusion.

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:	27	Date(s) of non-compliance:	Q3 2023
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Details of non-compliance:

A minor exceedance to the conditions of Table 16: Process monitoring, with a single field pH reading at the seepage discharge having an anomalous reading of 9.04. The laboratory sample analysed at the same time showed a reading of 7.73, which raises questions about the validity of the field sample.

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 is no suspected environmental impact of the non-compliance, levels remain relatively stable for the rest of the monitoring period. If the elevated levels were correct, the dilution factor of the seepage water with the rest of the process water would negate any increase in risk to environmental receptors.

Section F – Declaration			
<p>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.</p> <p>I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.</p>			
Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:	General Manager	Position:	
Date:	28/2/2024	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.