



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

### Section A – Licence Details

Licence number:	L8457/2010/2	Licence file number:	2012/006865
Licence holder:	Silver Lake (Integra) Pty Limited		
Trading as:	Silver Lake (Integra) Pty Limited		
ACN:	093 278 436		
Registered address:	South Shore Plaza Suite 4 Level 3 83-85 South Perth Esplanade SOUTH PERTH WA 6151		
Reporting period:	01/01/2024 to 31/12/2024		

### 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:	1,302,484 tonnes
Category 6: Mine dewatering: premises on which water is extracted and discharged into the environment to allow mining of ore.	94,283 tonnes
Category 64: Class II or Class III putrescible landfill site	95 tonnes

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:	15	Date(s) of non-compliance:	20/03/2024
Details of non-compliance:			
Breach of SWL limit for monitoring bores MB002, NMB01, NMB06 & NMB02			
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.			
See Figure 3 in the licence for location of monitoring bores. No actual or suspected environmental impact was observed.			
Cause (or suspected cause) of non-compliance:			
<p>67.4mm of rain from 22/02/2024 to 9/03/2024 has caused all monitoring bore SWLs to rise. The construction of the additional East GW Recovery Drain was completed in March 2024 and pumping capacity has increased significantly. Groundwater SWLs are dropping since the rain with increased pumping capacity.</p> <p>The Groundwater Management Plan has been reviewed, and an addendum is being drafted for submission 22/03/24 to support a Works Approval application with additional groundwater recovery strategies. Further investigation indicates possible mounding of the water table due deposition into TSF2 which sits on top of old In-Pit TSF and/or an aquitard causing surface expression.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
SWLs will continue to be monitored more frequently than licence requirements over the next quarter and groundwater recovery maximised. Additional monitoring bores will be installed as per the Works Approval Application for TSF1 and TSF2 and Specified Actions. Additional pumps have been procured with increased pumping capacity and more prompt exchange resulting from maintenance/mechanical failure.			
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: 27/08/2024	

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:	22	Date(s) of non-compliance:	16/03/2024
Details of non-compliance:			
<p>'Any failure or malfunction of any pollution control equipment or any incident, which has caused, is causing or may cause pollution'.</p> <p>Water of unknown origin was identified to be leaking from a single location at the base of TSF1/IWL embankment toe.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>The release of groundwater entered Salt Creek upstream of the previously impacted area reported in May 2023. No impacts beyond this impact zone have been recorded to the south however there is evident constrained deterioration of vegetation and surface crusting between the area of impact and the surface water drain from initial surface flow. All water is now contained in the TSF2 Turkey Nest dam and pumped back to the decant pond.</p>			
Cause (or suspected cause) of non-compliance:			
<p>It appears expelled water is likely from a historic, un-grouted exploration bore under the embankment toe which became artesian due to increased groundwater mounding around the TSFs and high rainfall. This phenomenon has been witnessed at other locations beyond the embankment toes in the past.</p> <p>62mm of rain was recorded at the facility over the previous 2 weeks with greater volumes recorded in the vicinity of the large catchment report to Salt Creek, contributing to rising groundwater levels in the area generally.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The area where water was being expelled and has been stripped back of topsoil/fines, geofabric applied and 'buttressed' with NAF waste rock as a precaution and to manage localised erosion. Piping and geotechnical stability issues are considered low risk at this point as discussed with the design engineers. DEMIRS have been notified.</p> <p>The Groundwater Management Plan was revised to identify further management solutions and was submitted to DWER to support the Works Approval for the current embankment stages.</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: 18/03/2024 (updated 25/03/24 and 10/05/24)	

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:	15 & 22	Date(s) of non-compliance:	13/06/2024
Details of non-compliance:			
Breach of SWL limit for monitoring bores MB002 & Notification was not provided 'as soon as practicable but no later than 5pm of the next usual working day'.			
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.			
See Figure 3 in the licence for location of monitoring bores. No actual or suspected environmental impact was observed.			
Cause (or suspected cause) of non-compliance:			
SWLs in all groundwater monitoring bores in June were compliant except MB002 (which was also compliant when read at 'top of casing'(4.01mbgl) – a reading error notified to DWER on 22/05/24). MB002 was sampled out of sequence with all other bores (1 Jun 24) due to access issues at that time – presenting an atypical monitoring event. Usual personnel were not available to review monitoring results hence notification was missed.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
SWLs will continue to be monitored more frequently than licence requirements over the next quarter and groundwater recovery maximised. Additional monitoring bores will be installed as per the Works Approval Application for TSF1 and TSF2. Additional pumps have been procured with increased pumping capacity. Personal re-training and re-iteration of licence conditions including breach of limit notification timeframes.			
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//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:	15	Date(s) of non-compliance:	27/08/2024
Details of non-compliance:			
Breach of SWL limit for monitoring bores MB002, BH02, NMB01 & NMB06			
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.			
See Figure 3 in the licence for location of monitoring bores. No actual or suspected environmental impact was observed.			
Cause (or suspected cause) of non-compliance:			
Possible mounding of the water table due deposition into TSF2 which sits on top of old In-Pit TSF.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
SWLs will continue to be monitored more frequently than licence requirements over the next quarter and groundwater recovery maximised. Additional monitoring bores are being installed as per the Works Approval 6927 for TSF1 and TSF2. Further groundwater recovery will be installed as informed by the hydrogeological review. Pump spares are being procured to reduce the delay in extraction for future mechanical failures.			
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: 28/08/2024	

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:	15 & 22	Date(s) of non-compliance:	27/08/2024, 11/12/2024
Details of non-compliance:			
Breach of SWL limit for monitoring bores IGRSM007 & Notification was not provided 'as soon as practicable but no later than 5pm of the next usual working day'.			
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.			
See Figure 3 in the licence for location of monitoring bores. No actual or suspected environmental impact was observed (monitoring was undertaken, administrative non compliance).			
Cause (or suspected cause) of non-compliance:			
The SWL was shallower than 6mbgl at IGRSM007 prior to being added to the licence amendment on 01/08/2024, which was not identified in the draft Licence assessment process. Monitoring data provided to DWER in the Attachment 8 Supporting document for the licence amendment demonstrated in Table 2 that this monitoring bore had only been deeper than 6mbgl three times since non-obligatory monitoring began in February 2024. Monitoring has been conducted as per the licence condition, however reporting of the SWL shallower than limit has been unintentionally missed by oversight.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
SWLS in this bore are relatively stable and shallowing slowly. A limit of 4mbgl will be requested in the next licence amendment. SWLs will continue to be monitored more frequently than licence requirements over the next quarter and groundwater recovery maximised. Personal re-training and re-iteration of licence conditions including breach of limit notification timeframes.			
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:	15	Date(s) of non-compliance:	11/12/2024
Details of non-compliance:			
Breach of SWL limit for monitoring bores MB002, BH02 & NMB01			
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.			
See Figure 3 in the licence for location of monitoring bores. No actual or suspected environmental impact was observed.			
Cause (or suspected cause) of non-compliance:			
Following a significant rainfall event on the 20/11/24 (65.4 mm, BOM) all pumps failed and were out of service for 5 days. Generally, SWLs had been trending deeper (identified through internal monitoring) but shallowed rapidly after the rainfall event.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
SWLs will continue to be monitored more frequently than licence requirements over the next quarter and groundwater recovery maximised. Additional groundwater recovery is being planned as per the Works Approval 6927 'Specified Actions' for TSF1 and TSF2. Further groundwater recovery will be installed as informed by the hydrogeological review. Pump spares are being procured to reduce the delay in replacement for future mechanical failures.			
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: 11/12/2024	

## 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> :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:	25/03/2025	Date:	
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.