



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:	L8621/20111	Licence file number:	2011/009784-1
Licence holder name:	Roy Hill Iron Ore Pty Ltd		
Trading as:	ROY HILL IRON ORE PTY LTD		
ACN:	123 722 038		
Registered business address:	5 Whitham Road Perth Airport WA 6105		
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	72,308,000 wet tonnes produced 63,937,000 wet tonnes exported
6	58,693,247 m ³ (assumed m ³ is equivalent to tonnes)
12	892,177 tonnes
52	N/A - power generation facilities not constructed
73	5,102 m ³ maximum
85B	2.54 GL

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	AV WWTP – 351.72 m ³ /day AV 2 WWTP – 16.81 m ³ /day MSA WWTP – 11.01 m ³ /day PSA WWTP – 11.8 m ³ /day
57	2,707 tyres in Jan 2,788 tyres in Jun 476 tyres in Nov
64	Inert Waste Type 1/Putrescible Waste/ Clean fill - 3,568 tonnes Inert Waste Type 2 - 5,480 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:	(1) The licence holder shall record and investigate the exceedance of any descriptive or numerical limit	Date(s) of non-compliance:	<u>WWTP daily discharge rates</u> 7, 11, 18, 19, 21, 26 Jan 23 3, 5, 7, 22 Feb 23 25, 28 Mar 23 15, 28 Apr 23 9, 11, 28 Jun 23 5, 20, 21 Jul 23 9, 21, 30 Aug 23 5, 20 Sep 23 7 Oct 23 1, 3, 28 Nov 23 13, 14, 15, 16, 19, 23 Dec 23 <u>Bulk Fuel aggregate volume</u> Throughout the reporting period <u>Groundwater point source emissions</u> <u>Stage 1</u> March 2023 July 2023 <u>No Name Creek discharges</u> 14 February 2023 <u>Borefield Injection TSS limit</u> <u>SWIB</u> 2 Sep 23 2 Nov 23 12 Dec 23 <u>RMAR</u> 15 Aug 23
Details of non-compliance:			

Section E – Details of non-compliance with licence condition	
No exceedance reports, recording or detailing investigations, for excursions beyond limits defined in the Operating Licence discoverable in RHIO’s event reporting system, INX	
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.	
None – this was an administrative non-compliance and had no actual or suspected impact on the environment.	
Cause (or suspected cause) of non-compliance:	
Incomplete implementation of the Operating Licence	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<ol style="list-style-type: none"> 1. Include a RACI in the Approvals Handover process and Incident Reporting Procedure to clarify parties required in the workflow processes delivering compliance with regulatory instruments. 2. Provide Operating Licence responsibility dissemination to relevant areas. 3. Undertake regular compliance assurance against Operating Licence. 	
Was this non-compliance previously reported to DWER? No	
<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:	(2) The licence holder shall only have landfill waste and store used tyres onto the premises if: (a) it is of a type listed in Table 1 (b) the quantity accepted is below any quantity limit listed in Table 1 (c) it meets any specification listed in Table 1	Date(s) of non-compliance:	7, 11, 18, 19, 21, 26 Jan 23 3, 5, 7, 22 Feb 23 25, 28 Mar 23 15, 28 Apr 23 9, 11, 28 Jun 23 5, 20, 21 Jul 23 9, 21, 30 Aug 23 5, 20 Sep 23 7 Oct 23 1, 3, 28 Nov 23 13, 14, 15, 16, 19, 23 Dec 23
Details of non-compliance:			
Accommodation Village WWTP capacity of 510m ³ /d exceeded 21 times Accommodation Village WWTP2 capacity of 40m ³ /d exceeded 3 times Mine Services Area WWTP capacity of 48m ³ /d exceeded 4 times Process Services Area WWTP capacity of 35m ³ /d exceeded 7 times			
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 actual environmental impacts were identified due to the daily exceedances as monitoring of spray field conditions continued and no compliance issues were observed (e.g. pooling of effluent on the ground in spray field).			
Cause (or suspected cause) of non-compliance:			
Monitoring of WWTP discharges to date has been manually achieved through Plumbers taking written recordings of the digital display present on the discharge flow meter. The manual recordings have created a lag in the ability to monitor performance and thereby compliance of WWTP daily flows.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
RHIO is progressing the automatic reporting of WWTP daily flows through the direct upload of WWTP metered readings to the business' Pi Historian database and daily reporting in Power BI dashboards, increasing line of sight on performance and compliance.			
Was this non-compliance previously reported to DWER? No			
<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:	(4) The licence holder shall ensure that wastes accepted onto the premises are only subjected to the process(es) set out in Table 2 and in accordance with any process limits described in that table. - Sewage - Waste	Date(s) of non-compliance:	7, 11, 18, 19, 21, 26 Jan 23 3, 5, 7, 22 Feb 23 25, 28 Mar 23 15, 28 Apr 23 9, 11, 28 Jun 23 5, 20, 21 Jul 23 9, 21, 30 Aug 23 5, 20 Sep 23 7 Oct 23 1, 3, 28 Nov 23 13, 14, 15, 16, 19, 23 Dec 23
Details of non-compliance:			
<p><u>Sewage</u> Accommodation Village WWTP capacity of 510m³/d exceeded 21 times Accommodation Village WWTP2 capacity of 40m³/d exceeded 3 times Mine Services Area WWTP capacity of 48m³/d exceeded 4 times Process Services Area WWTP capacity of 35m³/d exceeded 7 times</p> <p><u>Waste</u> No evidence demonstrating the disposed waste meets Class II landfill requirements as per DWER 2019</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> <p>No actual environmental impacts were identified, or suspected, due to the non-compliances. Treated wastewater was discharged to spray fields in compliance with the Operating Licence conditions, and records documenting wastes disposed of to the landfill cells was compliant with the licence as well; the related waste non-compliance was administrative.</p>			
Cause (or suspected cause) of non-compliance:			
<p><u>Sewage</u> Monitoring of WWTP discharges to date has been manually achieved through Plumbers taking written recordings of the digital display present on the discharge flow meter. The manual recordings have created a lag in the ability to monitor performance and thereby compliance of WWTP daily flows.</p> <p><u>Waste</u> Incomplete implementation of the Operating licence</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p><u>Sewage</u> RHIO is progressing the automatic reporting of WWTP daily flows through the direct upload of WWTP metered readings to the business' Pi Historian database and daily reporting in Power BI dashboards, increasing line of sight on performance and compliance.</p> <p><u>Waste</u> Monthly assurance reports of the Operating Licence have been implemented to monitor compliance across the reporting period.</p>			

Section E – Details of non-compliance with licence condition	
Was this non-compliance previously reported to DWER? No	
<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:	(12) The licence holder shall: (a) undertake inspections as detailed in Table 5	Date(s) of non-compliance:	Throughout the reporting period
Details of non-compliance:			
Evidence of inspections meeting requirements of Table 5 for transfer ponds, WBP reject water pipelines, pipelines from transfer ponds and mine dewater pipelines not found for the reporting period. Evidence of functionality and calibration checks of the weather station not found for 10 of the 12 months.			
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 known actual or suspected environmental impacts were identified due to the non-compliances.			
Cause (or suspected cause) of non-compliance:			
Incomplete implementation of the Operating Licence			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Develop and implement monthly inspection, and functionality & calibration checks, for water conveyancing infrastructure and weather station, respectively.			
Was this non-compliance previously reported to DWER? No			
<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:	(13) The licence holder must ensure that the proposed works specified in Column 1 of Table 6 are designed and constructed to meet or exceed the specifications in Column 2 of Table 6 for the infrastructure in each row of Table 6	Date(s) of non-compliance:	Indeterminate – date of construction completion not confirmed (approx. July 2023)
Details of non-compliance:			
As constructed plans for the Process Water Dam (2) have not been evidenced confirming compliance of the infrastructure with Column 2 of Table 6, prior to initiating operation of the infrastructure.			
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.			
A loss of containment of desalinated fresh water from the Process Water Dam (2) has resulted from the parting of the HDPE liner to the underlying soil. The environmental consequence of the loss of containment is considered negligible given the nature of the inventory (i.e. freshwater).			
Cause (or suspected cause) of non-compliance:			
Incomplete handover of construction project to operations prior to commencing operation with the infrastructure.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Have the construction of the infrastructure certified by a Professional Engineer including provision of as constructed plans.			
Was this non-compliance previously reported to DWER? No – the LoC was 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:	(14) Subject to condition 13, within 60 days of the completion of the Works specified in Table 6, the licence holder must provide to the CEO an Environmental Compliance Report certified by a suitably qualified professional engineer.	Date(s) of non-compliance:	Indeterminate – date of construction completion not confirmed (approx. Sep 2023)
Details of non-compliance:			
<p>1) An environmental compliance report certified by a suitably qualified professional engineer was not submitted to DWER within 60 days of the completion of works of the Process Water Dam (2).</p> <p>2) An environmental compliance report certified by a suitably qualified professional engineer was not submitted to DWER within 60 days of the completion of works of the 10 injection bores in the South West Injection Borefield (SWIB).</p> <p>3) An environmental compliance report certified by a suitably qualified professional engineer was not submitted to DWER within 60 days of the completion of works of the remaining RMARN injection bores.</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>			
<p>1) A loss of containment of desalinated fresh water from the Process Water Dam (2) has resulted from the parting of the HDPE liner to the underlying soil. The environmental consequence of the loss of containment is considered negligible given the nature of the inventory (i.e. freshwater).</p> <p>2) None – this was an administrative non-compliance and had no actual or suspected impact on the environment. Monitoring of groundwater was conducted as per the Licence requirements. The Environmental Compliance Report detailing adherence to work specifications has been submitted in March 2024.</p> <p>3) None – this was an administrative non-compliance and had no actual or suspected impact on the environment. Monitoring of groundwater was conducted as per the Licence requirements. A report detailing compliance of remaining bores is planned to be submitted in Q2 2024.</p>			
Cause (or suspected cause) of non-compliance:			
<p>1) Incomplete handover of construction project to operations prior to commencing operation with the infrastructure.</p> <p>2) and 3) Incomplete handover of the Operating Licence to team undertaking construction works</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>1) Have the construction of the infrastructure certified by a Professional Engineer including provision of as constructed plans.</p> <p>2) and 3) Revision of the Approvals Handover process to ensure parties required in the workflow processes delivering compliance with regulatory instruments are aware.</p>			
Was this non-compliance previously reported to DWER? No			
<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:	(16) The licence holder shall ensure the limits specified are not exceeded <u>Bulk storage of chemicals (fuel)</u> 5,530 m ³ in aggregate	Date(s) of non-compliance:	Throughout the reporting period
Details of non-compliance:			
There are two bulk fuel (diesel) storage tanks located at the mine, both having a capacity of 2,500 m ³ . In addition, there are fuelling facilities for HME located at go-lines across the mine. In aggregate, monthly inventory records of diesel at the mine varied between 3,819 and 7,221 m ³ over the reporting period.			
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 actual or suspected environmental impact was determined due to the non-compliance.			
Cause (or suspected cause) of non-compliance:			
The Operating licence provides for bulk storage of chemicals (fuel) at the main tanks only; not for storage facilities provided at refuelling facilities across the mine (e.g. go-lines).			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Seek amendment to the Operating Licence to accommodation distributed fuel storage facilities as well as fuel receiving tanks.			
Was this non-compliance previously reported to DWER? No			
<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:	(18) The licence holder shall record and investigate the exceedance of any descriptive or numerical limit specified in conditions 20, 22 and 26 of this licence	Date(s) of non-compliance:	<u>Stage 1</u> March 2023 July 2023 <u>No Name Creek</u> 14 February 2023
Details of non-compliance:			
No INX event reports discoverable recording exceedances and investigative outcomes for compliance requirements in the conditions listed			
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 actual or suspected environmental impact was identified due to numerical limits being breached not being reported.			
Cause (or suspected cause) of non-compliance:			
Incomplete implementation of the Operating Licence.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Revision of the Approvals Handover process and Incident Reporting Procedure to ensure parties required in the workflow processes delivering compliance with regulatory instruments are aware.			
Was this non-compliance previously reported to DWER? No			
<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:	(20) The licence holder shall not cause or allow point source emissions to groundwater greater than the limit listed in Table 9	Date(s) of non-compliance:	<u>Stage 1</u> March 2023 July 2023
Details of non-compliance:			
<u>Stage 1 borefield injection bores</u> Monthly averages for electrical conductivity show salinity of injection water exceeded the limit of 7,300 µS/cm in two months: March (7,599 µS/cm) and July (8,200 µS/cm).			
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.			
While water with a salinity slightly above the licence limit was injected into the Stage 1 aquifer, the duration was short (1 to 2 days) before the activity ceased. As such, no impact to the aquifer was identified or suspected due to the limit breach.			
Cause (or suspected cause) of non-compliance:			
Injection of water above the EC limits in March and July resulted in cessation of injection. The durations of injection for these months were two and one days, respectively. As a result, while the management actions were effective in that the injection ceased with the recording of higher salinity water, the monthly average limit was breached.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Injection of excess hypersaline water in the Remote Managed Aquifer Recharge-North borefield			
Was this non-compliance previously reported to DWER? No			
<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:	(26) The licence holder shall not cause or allow point source emissions to surface water greater than the limits No Name Creek Discharge Continuous over four days of unscheduled process water dam discharge, once every 5 years	Date(s) of non-compliance:	14 February 2023
Details of non-compliance:			
Discharge frequency occurred more than once in five years			
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.			
Freshwater discharged from the process water dam into the creek was monitored, sampled and analysed to determine if any contaminants of concern (physical, chemical) were present that may cause harm in relation to the discharge. No findings were made that indicated short- or longer-term impacts to the creek had occurred due to the discharge.			
Cause (or suspected cause) of non-compliance:			
A second release within the allocated five-year period occurred due to process plant trip. A trip in the plant then causes water from the desands unit to report to the bund which cannot contain the volume.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A larger diesel pump has been installed to assist in reducing the volume of water overflowing from the desands unit to the sump when a process plant trip occurs.			
Was this non-compliance previously reported to DWER? No			
<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:	(31) The licence holder shall undertake the monitoring in Table 14 according to the specifications SWIB injection bores as listed in Appendix 1 (when injection occurs during the quarter) Sampling conducted from each of the following trunklines: SWIBPL1, SWIBPL2, SWIBPL3, SWIBPL4	Date(s) of non-compliance:	Throughout the reporting period
Details of non-compliance:			
Sampling points were at the bore headworks not at the trunkline sampling points			
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 actual or suspected environmental impact occurred due to the non-compliance.			
Cause (or suspected cause) of non-compliance:			
A more representative sample of injected water quality can be achieved at the bore headworks than from the trunkline			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Amend the licence to ensure the sampling activity is commensurate.			
Was this non-compliance previously reported to DWER? No			
<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:	(32) The licence holder shall take the relevant management action in the case of a trigger level event (TSS > 75mg/L) SWIB injection bores Remote MAR borefield	Date(s) of non-compliance:	<u>SWIB</u> 2 Sep 23 2 Nov 23 12 Dec 23 <u>RMAR</u> 15 Aug 23
Details of non-compliance:			
<u>SWIB</u> 3 exceedances recorded during reporting period - management actions not taken <u>RMAR</u> 2 exceedances recorded during reporting period - management actions not taken			
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.			
While water with a concentration of total suspended solids above the licence limit was injected into the SWIB and RMAR aquifers on three and one observed events, respectively, no impact to the aquifer is expected due to extremely intermittent limit breach.			
Cause (or suspected cause) of non-compliance:			
TSS concentrations are a laboratory measurement and are therefore a lagging indicator. The ability to take real-time management actions in response to TSS laboratory data is an impossibility.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Recommend the licence be amended such that limits based on TSS are removed and that water quality monitoring is evaluated based on salinity – electrical conductivity and total dissolved solids.			
Was this non-compliance previously reported to DWER? No			
<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:	(38) The licence holder shall undertake the monitoring as specified No Name Creek	Date(s) of non-compliance:	14 February 2023
Details of non-compliance:			
An incomplete parameter list was collected during discharge from the process water dam to No Name Creek. Monitoring did not include: pH, temperature, dissolved oxygen, electrical conductivity, and the list of 'other parameters' as included in the Operating Licence.			
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 further environmental impact is expected to have arisen from the omission of parameters from the monitoring suite given the nature of the discharge – freshwater released from the process water dam to No Name Creek.			
Cause (or suspected cause) of non-compliance:			
Incomplete implementation of the Operating Licence			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Revise the Work Instruction for monitoring of process water dam discharges to No Name Creek to ensure that a complete list of parameters is captured.			
Was this non-compliance previously reported to DWER? No			
<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:	(39) The licence holder must maintain accurate and auditable books including the following records, information, reports and data required by this licence (b) the works conducted in accordance with condition 13 of this licence (c) any maintenance of infrastructure that is performed in the course of complying with condition 13 of this licence (d) monitoring programmes undertaken in accordance with conditions (e) complaints received under condition 42 of this licence	Date(s) of non-compliance:	(b) Not defined – approximated to be July 2023 (c) Not defined – approximated to be November 2023 (d) 14 February 2023 (e) throughout reporting period
Details of non-compliance:			
(b) As constructed plans not produced for the process water dam (c) Remediation program for the process water dam not produced (d) Monitoring programmes incomplete (e) No complaints register discoverable			
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 due to the record keeping inadequacies			
Cause (or suspected cause) of non-compliance:			
Incomplete implementation of the Operating Licence			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Development and implementation of a compliance assurance framework for the Operating Licence (Timeframe – 12 Months)			
Development and implementation of a confidential complaints register			
Was this non-compliance previously reported to DWER? No			
<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:	(41) The licence holder shall implement and maintain a system which ensures that a record is made of: (c) any documentary evidence to demonstrate compliance with the Class II landfill acceptance criteria	Date(s) of non-compliance:	Throughout reporting period
Details of non-compliance:			
No evidence demonstrating the disposed waste meets Class II landfill requirements as per DWER 2019			
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 actual or suspected environmental impacts were identified due to the non-compliances.			
Cause (or suspected cause) of non-compliance:			
Incomplete implementation of the Operating Licence			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Development and implementation of a compliance assurance framework for the Operating Licence (Timeframe – 12 Months)			
Was this non-compliance previously reported to DWER? No			
<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:	(44) The licence holder must submit to the CEO by no later than 90 days after the end of each annual period, an Annual Environmental Report for that annual period for the conditions listed in Table 21, and which provides information in accordance with the corresponding requirements set out in Table 21.	Date(s) of non-compliance:	22 Mar 2023
Details of non-compliance:			
Section 3.2.1 of the AER reports on activity of DSO crusher but not location (s). Section 4.1 requires point source emissions to groundwater - summary of exceedances but management actions taken not included.			
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 actual or suspected environmental impact has occurred in relation to the non-compliance.			
Cause (or suspected cause) of non-compliance:			
Compliance review of the AER not completed prior to submission.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Ensure a compliance review of the AER is completed prior to submission.			
Was this non-compliance previously reported to DWER? No			
<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:	(47) The licence holder shall ensure that the parameters listed in Table 23 are notified to the CEO and in accordance with the notification requirements	Date(s) of non-compliance:	<u>WWTP daily discharge rates</u> 7, 11, 18, 19, 21, 26 Jan 23 3, 5, 7, 22 Feb 23 25, 28 Mar 23 15, 28 Apr 23 9, 11, 28 Jun 23 5, 20, 21 Jul 23 9, 21, 30 Aug 23 5, 20 Sep 23 7 Oct 23 1, 3, 28 Nov 23 13, 14, 15, 16, 19, 23 Dec 23 <u>Bulk Fuel aggregate volume</u> Throughout the reporting period <u>Groundwater point source emissions</u> <u>Stage 1</u> March 2023 July 2023 <u>No Name Creek discharges</u> 14 February 2023 <u>Borefield Injection TSS limit</u> <u>SWIB</u> 2 Sep 23 2 Nov 23 12 Dec 23 <u>RMAR</u> 15 Aug 23
Details of non-compliance:			
<u>Breach of any limit specified in the licence</u> – notifications not made in relation to a number of breaches identified during the audit			
<u>The licence holder shall submit to the CEO bore logs for each of the proposed bores within 30 days of installation</u> – bore logs not submitted			
<u>Unscheduled release of water to No Name Creek Discharge location</u> – no notifications made regarding discharges to No Name Creek			
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 actual or suspected environmental impact was identified due to the unreported breaches			
Cause (or suspected cause) of non-compliance:			

Section E – Details of non-compliance with licence condition	
Incomplete implementation of the Operating Licence	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
Revision of the Approvals Handover process and Incident Reporting Procedure to ensure parties required in the workflow processes delivering compliance with regulatory instruments are aware. Update of the Incident Reporting Procedure to include breaches/ exceedances of the Operating Licence and commensurate notification requirements to DWER.	
Was this non-compliance previously reported to DWER? No	
<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 :		Signature:	
Name: (printed)		Name: (printed)	
Position:	Chief Financial Officer	Position:	
Date:	20/03/2024	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.