



Annual Audit Compliance Report Form
Environmental Protection Act 1986, Part V Division 3

Section A – Licence details			
Licence number:	L8644/2012/1	Licence file number:	2012/002162-1
Licence holder name:	Big Bell Gold Operations Pty Ltd		
Trading as:	Big Bell Gold Operations Pty Ltd		
ACN:	84 090 642 809		
Registered business address:	Office: Level 6, 197 St Georges Tce, Perth, WA, 6000 Post: PO Box 7068, Cloisters Square, WA, 6850		
Reporting period:	01/01/2020 to 31/12/2020		

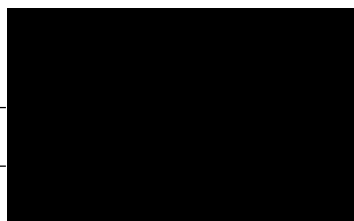
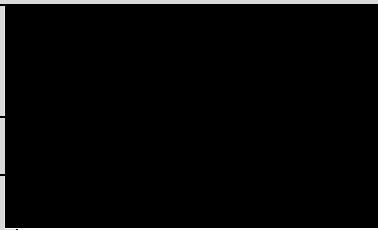
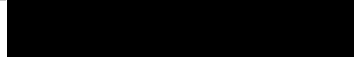
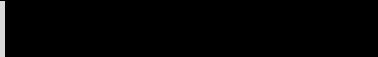
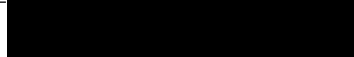

Section B – Statement of compliance with licence conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none">• section C;• section D (if required); and• sign 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 – Processing or beneficiation of metallic or non-metallic ore	1,271,397 tonnes
6 – Mine dewatering	32,429 tonnes
64 – Class II putrescible landfill	219 tonnes

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
Water to allow mining of ore	32,429 tonnes
Tailings	1,647,021 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:	12	Date(s) of non-compliance:	April, July and September 2020
Details of non-compliance:			
<p>Three breaches of licence limits were recorded and reported to DWER during 2020:</p> <ul style="list-style-type: none"> - 15 April 2020: Breach of sulphate limit (2000mg/L) in TSF2 monitoring bore TBS3; - 13 July 2020: Breach of sulphate limit (2000mg/L) in TSF2 monitoring bore TBS3; and - 24 September 2020: Breach of sulphate limit (2000mg/L) in TSF2 monitoring bore TBS3. <p>A series of Form N1 notifications were submitted to DWER between 2017 and 2020 to advise of exceedance of the licence limits for sulphate and TDS at monitoring bore TBS3. DWER requested an investigation into the exceedances in April 2019 and a report was submitted by BBGO to DWER in May 2019. Following DWER assessment, L8644/2012/1 was amended to add the monitoring of ambient vegetation quality at four reference points surrounding TSF2. The licence was further amended on 23 November 2020 to increase the licence limits to 3,000mg/L for sulphate and 5,000 mg/L for TDS.</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>			
Breaches of the licence limits are limited to sulphate and TDS at monitoring bore TBS3. As the exceedance is localised, the environmental impact at this stage is likely to be minimal. TDS and sulphate levels will continue to be monitored.			
Cause (or suspected cause) of non-compliance:			
BBGO identified that it is likely that seepage through TBS3 is caused by a bedrock fracture beneath TSF2, and/or surface water flows through TSF. It was also observed that a large volume of water pools at the north-eastern corner of TSF2 following periods of rainfall. It is possible that this water is seeping through the TSF in a north-south direction towards TBS3.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>In accordance with Improvement Notice IR1 (Condition 13), BBGO has commissioned a ground-based electrical geophysical investigation around TSF2 to determine the distance and depth to which the groundwater extends from the TSF. A report will be provided to the CEO by 31 October 2021 which:</p> <ul style="list-style-type: none"> - describes the relationship between surface water flows and water chemistry at TBS3; - advises whether the diversion of surface water upstream of TSF2 has prevented pooling on the north-eastern base of TSF2; - provides the results of the ground-based electrical or electromagnetic geophysical investigations required by IR1; and - identifies what further controls for reducing seepage are required, based on the outcomes of the above analysis. <p>In the medium to long term (12 months to 2 years), after tailings in TSF2 has sufficiently settled and subsided, 0.5m of waste rock material and 0.2m of laterite and topsoil will be spread on the surface of the TSF. Infrastructure will be removed and the surface will be ripped and revegetated using local provenance flora species. The rehabilitation plan will also include the following where required:</p> <ul style="list-style-type: none"> - Profiling of the outer embankments to reduce long-term erosion risk; - Covering of the outer slopes and surfaces with appropriate waste rock; - Backfill of all seepage collection trenches and ponds if constructed (and when no longer required); and - Ripping and seeding all profiled surfaces with appropriate species. 			

Section E – Details of non-compliance with licence condition	
Rehabilitation of the upper surface will commence when a geotechnical review demonstrates that the strength of the deposited tailings is sufficient to withstand the placement of capping material.	
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: Form N1 submitted to DWER on 15 April 2020, 13 July 2020 and 24 September 2020.

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:	31/03/2021	Date:	31/03/2021
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.