



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

### Section A – Licence Details

Licence number:	L8644/2012/1	Licence file number:	2012/002162-1
Licence holder:	Big Bell Gold Operations Pty Ltd		
Trading as:	Big Bell Gold Operations Pty Ltd		
ACN:	60 009 260 306		
Registered address:	Level 6, 200 St Georges Terrace Perth WA 6000		
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
05 – Processing and Beneficiation of Ore	1,284,808 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
06 – Mine Dewatering	1,213,983 tonnes
61 – Liquid Waste Facility	162,003 tonnes
64 – Class II Putrescible Landfill	218.4 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, Table 9	Date(s) of non-compliance:	24/03/2024, 25/06/2024, 26/06/2024, 21/09/2024, 08/12/2024
Details of non-compliance:			
<p><b>TBS3:</b> Three TDS exceedances detected (Limit 5,000 mg/L). Q1 – 5,700 mg/L recorded (24/03/2024). Q3 – 5,900 mg/L recorded (21/09/2024). Q4 – 5,900 mg/L recorded (08/12/2024).</p> <p>Two Sulphate exceedances detected (Limit 3000 mg/L). Q2 - 3200 mg/L (26/06/2024). Q3 – 3,400 mg/L (21/09/2024).</p> <p><b>JMB005:</b> TDS exceedance detected (Limit 4000 mg/L). Q2 – 4,500 mg/L (25/06/2024)</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<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><b>TBS3:</b> No environmental impact has been detected through photographic monitoring as demonstrated through Section 8.1 in the L8644/2012/1 2024 AER.</p> <p>A comprehensive geophysical assessment conducted by Applied Scientific Services and Technology (ASST) in March 2021 investigated the potential extent of seepage from TSF2. The assessment revealed the presence of naturally occurring near-surface clay, which acts as an effective barrier, confining any potential seepage to the localised area surrounding monitoring bore TBS3.</p> <p><b>JMB005:</b> SWL was recorded at 11,10 mbgl on 24/03/24, 13.38 mgbl on 25/06/24 and 25.96 mbgl on 21/09/24. This occurred after the supernatant pool was drawn down in an attempt to reduce seepage into JMB005 from the supernatant pool. The SWL returned to a pre-seepage interception level after deposition ceased in June 2024. TDS readings continued to decrease each month as the supernatant water dispersed from JMB005.</p> <p>No environmental impacts have been detected as a result of the exceedance and BBGO does not expect any significant or adverse effects to the surrounding vegetation health or groundwater aquifer quality.</p>			
Cause (or suspected cause) of non-compliance:			
<p><b>TBS3:</b> Caused by the leaching of process solution through TSF2 into surrounding groundwater, as designed.</p> <p><b>JMB005:</b> Caused by the filling of the Julies Reward In-pit TSF and close proximity to the supernatant pool. Upon building the reserve, it appears seepage has been intercepted by JMB005 due to the proximity of the monitoring bore to the supernatant pool.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			

<p><b>TBS3:</b> BBGO will continue monitoring SWL and undertaking quarterly local photo monitoring as per L8644/2012/1. The groundwater flow pathways direct the water and has not been assessed as a threat to the adjacent environment.</p>			
<p><b>JMB005:</b> BBGO will continue monitoring SWL. The supernatant pool has been removed and Julies Reward In-pit TSF is currently drying out after ceasing deposition in June 2024.</p>			
<p>Seepage reclamation/production bores (JDW05_R and JDW07) have been installed on the northern and southern side of Julies Reward In-pit TSF to reduce groundwater mounding and limit local groundwater infiltration. These bores are currently active and are assisting with seepage reclamation and drying out of the TSF. JMB005 appears to be returning to pre-deposition TDS readings after Julies Reward In-pit TSF ceased.</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: 26/02/2024, 22/04/2024, 17/06/2024, 10/07/2024, 18/10/2024	
<b>Section E – Details of Non-Compliance with Licence Condition</b>			
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, Table 4	Date(s) of non-compliance:	12/06/2024,
Details of non-compliance:			
<p><b>Julies Reward In-pit TSF (JRTSF):</b> Freeboard Limit of &lt;750 mm exceeded (12/06/2024).</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<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><b>JRTSF:</b> No environmental impact has been detected from regular visual inspections of JRTSF freeboard exceedance. Deposition ceased in June 2024 after detection of the exceedance. JRTSF has since dried out with no supernatant pool evident. It appears JRTSF's tailings are consolidating as the seepage reclamation bores (JDW05_R and JDW07) continue to dewater the surrounding groundwater table and reduce the groundwater table mounding effect.</p>			
<p>No tailings overflowed into the surrounding environment, and no significant environmental damage has occurred. Further earthworks were undertaken to ensure JRTSF remains safe, stable and non-polluting.</p>			
Cause (or suspected cause) of non-compliance:			

<b>JRTSF:</b> The assessments of tailings deposition and flow were inaccurate.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<b>JRTSF:</b> Regular survey point height monitoring and markers have been implemented around the embankments to ensure freeboard limits are not exceeded. JRTSF has ceased deposition and is at capacity.	
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: 17/06/2024
<b>Section F – Declaration</b>	
<b>Section F – Declaration</b>	

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:		31/03/25	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.