



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L8893/2015/2	Licence file number:	DER2015/001006-1
Licence holder:	Karora (Beta Hunt) Pty Ltd (Previously Salt Lake Mining Pty Ltd)		
Trading as:	Karora (Beta Hunt) Pty Ltd		
ACN:	162 824 473		
Registered address:	Ground Floor, 15 Altona Street, West Perth WA 6005		
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 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 6 – Mine dewatering	288,334 tonnes
Category 64 – Class II Putrescible Landfill	Estimated 272.4 tonnes
Category 64 – Class II Putrescible Landfill (Tyres)	Estimated 890.2 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
Category 6 – Mine dewatering	288,334 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:	Notification of unauthorised discharge to the environment under s.72 of the Environmental Protection Act.	Date(s) of non-compliance:	5/12/2023
Details of non-compliance:			
<p>Mine dewater at BHO is pumped to surface via a rising main and piped to the discharge pond on Lake Lefroy. The large majority of the pipeline is located on the salt lake bed of Lake Lefroy in an area that is devoid of natural vegetation and salt scalded. The pipeline has been in place for over two decades. On 5 December 2023, the pipeline ruptured in proximity to the rising main. Approximately 10 - 12 kL of hypersaline water was discharged onto the lake surface prior to reaching the discharge pond. The dewatering system was immediately turned off following identification of the pipeline failure. During repairs, it was identified the pipeline was old and brittle and the rupture was likely caused by a rapid change in temperature. The days leading up to the incident were the hottest recorded this summer, nearing 40 degrees. The s72 report is provided in Attachment 2.</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 environmental impact is expected to occur due to the discharge. The origin of the dewater is the palaeochannel underneath Lake Lefroy and the chemical profile of the dewater is similar to that of the lake sediment at point of discharge on Lake Lefroy. The surface of Lake Lefroy is naturally salt scalded and devoid of natural vegetation and has a long history of mining and discharge of saline dewater. The salt load introduced by the spill is only a small fraction compared with that on surface of the salt lake. No saline water was discharged into adjacent bushland. The spill is not expected to impact on the rooting zone of any native vegetation. A map of the spill is provided as Attachment 3.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The pipeline was old and brittle and the rupture was likely caused by a rapid change in temperature during hot temperatures.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The Maintenance Department has repaired the pipeline. The dewatering system is functional. Operators have prepared a scope to replace the pipeline with new materials given the likely reason for the failure was the age of the pipeline. The pipeline will be replaced once materials have been procured. An environmental alert has been communicated throughout the business, mandating an audit of all pipelines and infrastructure used for the transfer of saline water. Work orders will be established for any issues identified during the audits.</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: 15 / 12 / 2023	
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:	6	Date(s) of non-compliance:	09/06/2022
Details of non-compliance:			
In the Q2 2022 sampling period, a TDS result of 380,000 mg/L was returned from the discharge pond. This exceeds the 360,000 mg/L limit in section 6 of L8893/2015/2. This was identified during the collation of data for the AER report.			
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.			
The exceedance was an isolated event with all other samples for the reporting period returning results less than the licence limit. The dewater TDS dropped significantly for the subsequent four sampling periods down to 160,000 mg/L and no prolonged exceedance occurred.			
Lake Lefroy is naturally salt scalded and devoid of natural vegetation and has a long history of mining and discharge of saline dewater. The salt load introduced by the exceedance is unlikely to have any additional environmental impact due to the existing conditions and temporary nature of the exceedance.			
Cause (or suspected cause) of non-compliance:			
The source of dewatering at the BHO underground mine changes with mining development and pockets of higher salinity can occur. This can be unpredictable and results in variation to TDS levels.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
All sampling is now being conducted by Environment Department personnel who are familiar with the compliance and reporting requirements under L8893/2015/2. Data is being reviewed immediately after sampling results are returned to ensure licence requirements are being met and, if required, reported to DWER.			
In October 2023, the underground reticulation was improved to store raw water in disused stopes before pumping to surface to provide additional time for settlement. This also allows for dilution of higher TDS levels before discharging to Lake Lefroy. Mine water is also being carted from the Spargos Reward site which has a TDS ~ 10,000 mg/L. This will assist with diluting dewater that comes to surface.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 29 / 02 / 24	

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:	29-2-24	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.