



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:	L9009/2016/01	Licence file number:	DER2016/002134-1
Licence holder name:	Northern Minerals Limited		
Trading as:	Northern Minerals Limited		
ACN:	119 966 353		
Registered business address:	40 Kings Part Road, 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)

- 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 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
Category 5 – Processing or beneficiation of metallic or non-metallic ore; Assessed production capacity 131,490 tonnes per Annual Period.	Zero tonnes were processed during the reporting period as the Project was placed into care and maintenance on 20 April 2022.
89 – Putrescible landfill site; Assessed production capacity 499 tonnes per Annual Period.	120.5 m ³ of (uncompacted) waste disposed to landfill. Assuming volume reduced following compaction, it's estimated that 36.15 (compacted) tonnes were disposed to landfill.

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
Tailings Storage Facility (TSF)	Zero tails solids or slurry was discharged to the TSF as the Project was placed into care and maintenance on 20 April 2022.
Evaporation Pond (EP) Raffinate	Zero raffinate was discharged to the EP as the Project was placed into care and maintenance on 20 April 2022.

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:	10	Date(s) of non-compliance:	2023
Details of non-compliance:			
<p><i>Condition 10: The licence holder shall undertake an annual water balance for the TSF. The water balance shall as a minimum consider and include the following: (a) site rainfall; (b) evaporation; (c) tailings return water recovery volumes; (d) seepage recovery volumes; and (e) volumes of tailings deposited.</i></p> <p>The TSF Water Balance was updated to the end of February 2022 following completion of the Pilot Plant activities. Whilst in care and maintenance (C&M), the TSF water balance is not considered to be necessary as the risk of the TSF overtopping is considered low to negligible as explained in the AER - Section 3.</p> <p>Despite this, NML failed to seek DWER support to amend the condition prior to the TSF Water Balance being required to be conducted during the reporting period. As such it remains a non-conformance to condition 10.</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>			
<p>The risk of the TSF overtopping is considered low to negligible as the site is in C&M. It was considered that limited environmental risk is associated with this non-compliance.</p>			
Cause (or suspected cause) of non-compliance:			
Administrative / scheduling error exacerbated by a change in NML's environmental personnel.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>An incident has been raised in NMLs 'Safety, Training and Environment Management System' (STEMS), event ID 2645. The entry requires each 2023 AER non-conformance to be investigated and resolved to minimise the possibility of recurrence.</p> <p>STEMS Event 2645. Task 2127 has been raised to investigate this non-conformance and to either continue to comply with Condition 10 by conducting the TSF Water Balance assessment or to consult with DWER if an amendment to Condition 10 is proposed.</p>			
Was this non-compliance previously reported to DWER?			

Section E – Details of non-compliance with licence condition	
<input checked="" type="checkbox"/> 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:	15	Date(s) of non-compliance:	2023
Details of non-compliance:			
<p><i>Condition 15: The license holder shall ensure that:</i></p> <p><i>(a) all water samples are collected and preserved in accordance with AS/NZS 5667.1;</i></p> <p><i>(b) all groundwater sampling is conducted in accordance with AS/NZS 5667.11; and</i></p> <p><i>(c) all laboratory samples are submitted to and tested by a laboratory with current NATA accreditation for the parameters being measured, unless indicated otherwise in the relevant table.</i></p> <p>Where required all water samples have been sent to a NATA accredited laboratory. However, sample holding times have occasionally been exceeded for some analytes, due to the remote location of the site and the reality that samples need to be hand carried on commercial flights and delivered to the laboratory.</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>			
No impact to environment			
Cause (or suspected cause) of non-compliance:			
Administrative / scheduling issue associated with remoteness of the Browns Range Rare Earths Project.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
STEMS Event 2645. Preventative Action 2126: The monitoring schedule is to be revised and the period between sampling and laboratory analysis will be minimised to reduce the risk of samples not being analysed within the recommended sample holding times.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> 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:	17	Date(s) of non-compliance:	2023

Section E – Details of non-compliance with licence condition	
Details of non-compliance:	
<p>Condition 17: <i>The license holder shall ensure that all monitoring equipment used on the premises to comply with the conditions of this Licence is calibrated in accordance with the manufacturer's specifications.</i></p> <p>A multi-meter probe is used onsite to measure select analytes in the field e.g. pH and electrical conductivity. It has been identified that some of the calibration solutions used were out their use-by date for an unknown portion of the reporting period. This doesn't comply with the manufacturers specifications as required by Condition 17.</p>	
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 impact to environment	
Cause (or suspected cause) of non-compliance:	
Administrative error exacerbated by a change in NML's environmental personnel.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>STEMS Event 2645. Preventative Action 2128 (Complete):</p> <ul style="list-style-type: none"> - New calibration solutions have been ordered and used onsite. - A quarterly check has been included in the monitoring schedule to complete an inspection of field monitoring equipment to ensure it is maintained. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> 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:	21	Date(s) of non-compliance:	2023
Details of non-compliance:			
<p>Condition 21: <i>The license holder shall undertake the monitoring in Table 12 according to the specifications in Table 12. Table 12 relates to the TSF, EP and Landfill monitoring bores.</i></p> <p>Majority (95%) of monitoring was complete. Some testing of analytes was missed (5%) during the reporting period. As identified in the 2023 AER Appendix 1 and 2.</p>			
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 impact to environment			
Cause (or suspected cause) of non-compliance:			

Section E – Details of non-compliance with licence condition	
Administrative / scheduling error	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
STEMS Event 2645. Corrective Action 2129 (Complete): Revise the monitoring schedule to provide further detail of analytes to be tested under L9009/2016/1.	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> 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:	22	Date(s) of non-compliance:	2023
Details of non-compliance:			
<p><i>Condition 22: The license holder shall undertake the monitoring in Table 13 according to the specifications in Table 13 for release of captured water into the environment. Table 13 relates to sampling of the Event Ponds.</i></p> <p>The majority of monitoring (95%) was complete. Some sample events and testing of analytes was missed (5%) during the reporting period. As identified in the 2023 AER Appendix 1 and 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>			
No impact to environment			
Cause (or suspected cause) of non-compliance:			
Administrative / scheduling error			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
STEMS Event 2645. Corrective Action 2130: Revise the monitoring schedule to provide further detail of analytes to be tested under L9009/2016/1.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> 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:	24	Date(s) of non-compliance:	2023

Section E – Details of non-compliance with licence condition	
Details of non-compliance:	
<p><i>Condition 24: The license holder shall undertake the monitoring in Table 15 according to the specifications in Table 15. Table 15 relates to Vegetation photo-monitoring.</i></p> <p>Vegetation condition photo-monitoring was not conducted in 2023 due to suspected administrative error during changes to the NML environmental team. NML was advised that monitoring photographs were taken however could find no record of them, hence were unable to conduct the comparison with baseline photographs.</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>	
No impact to environment	
Cause (or suspected cause) of non-compliance:	
Administrative error	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
STEMS Event 2645. Corrective Action 2131: Revise the monitoring schedule to include vegetation photo monitoring as per L9009/2016/1 (Complete).	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> 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	
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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:	Chief Operating Officer	Position:	
Date:	28 March 2024	Date:	
Seal (if signing under seal):			

Department of Water and Environmental Regulation

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.