



## 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](mailto: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:	L9037/2017/1	Licence file number:	DER2017/000308
Licence holder name:	Process Minerals International Pty Ltd		
Trading as:	Process Minerals International Pty Ltd		
ACN:	063 988 894		
Registered business address:	20 Walters Drive, Osborne Park, WA, 6017		
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"><li>• section C;</li><li>• section D (if required); and</li><li>• sign the declaration in Section F.</li></ul>
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"><li>• section C;</li><li>• section D (if required);</li><li>• section E; and</li><li>• sign the declaration in Section F.</li></ul>

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 ores	2,671,308 wet metric tonnes
Category 6: Mine dewatering	44,100 tonnes
Category 12: Screening etc. of material	0 tonnes
Category 57: Used tyre storage (general)	393 tyres
Category 64: Class II putrescible landfill	1,139.38 tonnes
Category 73: Bulk storage of chemicals etc.	LNG = 480kL Tank Farm A (4 x 49.25kL tanks)

**Section C – Statement of actual production**

Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.

<b>Prescribed premises category</b>	<b>Actual production quantity</b>
	Tank farm B (3 x 49.25 kL tanks) <b>Diesel</b> = 854 kL Tank Farm C (3 x 110 kL tanks) Tank Farm D (3 x 57 kL + 1 x 53 kL tanks)
Category 85: Sewage facility	61.37 m <sup>3</sup> / day
Category 85b: Water desalination plant	0.032 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.

<b>Prescribed premises category</b>	<b>Actual Part 2 waste discharge quantity</b>
Category 5: Processing or beneficiation of metallic or non-metallic ores	Coarse Rejects (to Waste Dumps) – 999,542 Tonnes Fine Rejects (to Ghost Crab in-pit TSF) – 826,110 tonnes
Category 6: Dewatering	44,100 tonnes
Category 85b: Water desalination plant	0.032 GL

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:	9	Date(s) of non-compliance:	18 August 2023
Details of non-compliance:			
A routine environmental inspection on 18 August 2023 identified that coarse reject (tailings) material was being incorrectly used for construction purposes outside of the approved area in the Licence.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
Environmental impact related to the non-compliance is assessed as low, as:			
<ul style="list-style-type: none"> <li>- The coarse reject (tailings) material was removed from all non-compliant locations on identification of the at-variance use.</li> <li>- The use of coarse reject (tailings) material was limited to previously disturbed areas with sufficient surface water controls therefore having no direct contact to naturally vegetated areas.</li> <li>- Laboratory analysis identified geochemical characteristics consistent with historical data, which show leachate from the coarse reject material is likely to exhibit the following: low concentrations of soluble alkali metals, be moderately alkaline, and of low salinity. Further to this, at the alkaline to neutral pH range, (expected site conditions) leachability of metals is at its lowest.</li> </ul>			
Cause (or suspected cause) of non-compliance:			
Key findings on investigation of the non-compliance include, <ul style="list-style-type: none"> <li>- Directions for the use of coarse reject (tailings) were incorrectly given by senior management based on a misunderstanding of the scope of their approved use.</li> <li>- This led to further confusion around the use of coarse reject (tailings) material for construction purposes around site – at variance to the approved uses.</li> </ul>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<ul style="list-style-type: none"> <li>- The coarse reject (tailings) material identified at the WWTP and Tyre Bay was removed for disposal into the approved location of the Waste Rock Landform (WD02) (completed 22 August 2023)</li> <li>- Site wide communications were distributed to reeducate site teams on the approved use of coarse reject (tailings) material for construction purposes within the operational pit areas or within the processing plant footprint only (completed 24 August 2023)</li> <li>- Coarse reject (tailings) samples were collected from the processing plant stockpiles for laboratory analysis to validate that the geochemical composition remained the same and therefore potential environmental risk related to the material remained low (completed 30 September 2023)</li> <li>- Results of Laboratory analysis are included as <b>Attachment 1</b></li> </ul>			
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: 25 / 10 / 2023	

<b>Section E – Details of non-compliance with licence condition</b>																																																
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Condition no:	8	Date(s) of non-compliance:	15/02/2023, 16/05/2023																																													
Details of non-compliance:																																																
<p>Treated wastewater effluent that is discharged to the irrigation spray field for parameters in Column 1 of Table 5 is required to meet the limits specified in Column 2 of Table 5. Monitoring frequency is required Quarterly, as identified in Table 6.</p> <p>During both the Q1 (15/02/2023) and Q2 (16/05/2023) monitoring of wastewater effluent, several parameters exceeded the specified limit, including BOD, TSS, TN, and E. Coli.</p> <p>Laboratory Certificates are provided as <b>Attachment 2</b>.</p> <p>The exceedance results are highlighted in red in the below table.</p> <table border="1"> <thead> <tr> <th>Date</th> <th>BOD</th> <th>Total Suspended Solids (mg/L)</th> <th>Total Nitrogen (mg/L)</th> <th>Total Phosphorous (mg/L)</th> <th>pH</th> <th>Thermotolerant Coliforms (E. coli) (cfu/100mL)</th> </tr> </thead> <tbody> <tr> <td>Limit</td> <td>≤30 mg/L</td> <td>≤40 mg/L</td> <td>≤50 mg/L</td> <td>≤12 mg/L</td> <td>6.5 – 8.5</td> <td>&lt;1000 cfu/100ml</td> </tr> <tr> <td>21/11/2023</td> <td>2.5</td> <td>6.5</td> <td>7.1</td> <td>12</td> <td>8.1</td> <td>5</td> </tr> <tr> <td>24/08/2023</td> <td>7.2</td> <td>22</td> <td>21</td> <td>&lt;0.050</td> <td>8</td> <td>5</td> </tr> <tr> <td>16/05/2023</td> <td>7.2</td> <td>81</td> <td>52</td> <td>4.4</td> <td>7.9</td> <td>4800</td> </tr> <tr> <td>15/02/2023</td> <td>63</td> <td>91</td> <td>74</td> <td>9.1</td> <td>8</td> <td>5</td> </tr> </tbody> </table>							Date	BOD	Total Suspended Solids (mg/L)	Total Nitrogen (mg/L)	Total Phosphorous (mg/L)	pH	Thermotolerant Coliforms (E. coli) (cfu/100mL)	Limit	≤30 mg/L	≤40 mg/L	≤50 mg/L	≤12 mg/L	6.5 – 8.5	<1000 cfu/100ml	21/11/2023	2.5	6.5	7.1	12	8.1	5	24/08/2023	7.2	22	21	<0.050	8	5	16/05/2023	7.2	81	52	4.4	7.9	4800	15/02/2023	63	91	74	9.1	8	5
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Ongoing visual inspection of the irrigation field, weekly by Camp Maintenance Staff and Quarterly by Environment Staff, has not identified any actual or suspected environmental impact as a result of the non-compliance.																																																
Cause (or suspected cause) of non-compliance:																																																
Parameter limit exceedances occurred as a result of increased personnel at camp, and loading strain on the WWTP unit.																																																
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:																																																
<p>A Works Approval has been granted, and two new WWTP units have been installed in parallel to the existing Camp WWTP. The combined daily flow limit has increased to 170m<sup>3</sup> / day, enabling more effective waste water treatment and holding times to prevent recurrence of parameter limit exceedance.</p> <p>Training has also been provided to Camp Maintenance Staff to ensure competent operation of the WWTP, including regular servicing and systems management, is carried out.</p> <p>A newly created Superintended Water Utilities position will support the continued assessment and improvement of facility operation and adjustment to ensure compliance with effluent quality requirements.</p>																																																

<b>Section E – Details of non-compliance with licence condition</b>	
Was this non-compliance previously 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:	12	Date(s) of non-compliance:	Feb-Aug, Oct-Dec
Details of non-compliance:			
<p>Monthly data was not collected for volume of RO brine discharged to the Ghost Crab in-pit TSF, as required in Table 6: Emissions and discharge monitoring.</p> <p>Data was only collected for RO brine discharge on 01/01/2023, 30/09/2023, and 10/02/2024.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <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>There is no actual or suspected environmental impact related to the non-compliance. The RO plant has been running minimally during the reporting period, and brine is discharged directly to the Ghost Crab in-pit TSF. Discharge pipelines have continuous digital flow meters installed however regular manual readings to meet the Condition for reporting are required.</p>			
Cause (or suspected cause) of non-compliance:			
Operators of the RO Brine plants failed to collect manual readings of the units for reporting purposes.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Non-compliance to the Part V Licence has been communicated to the plant operators, who have confirmed they will capture data weekly going forward. The environment team have also scheduled end of month data collection from the units to ensure compliance to Licence conditions.			
Was this non-compliance previously 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: / /	

<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:	12	Date(s) of non-compliance:	Calendar Year 2023
<b>Details of non-compliance:</b>			
Monthly data was not collected for Dewatering water discharged to Northern Pits 1 and 2 and Central Pit from the designated monitoring location, Dewatering pipeline flow meters.			
<b>What was the actual (or suspected) environmental impact of the non-compliance?</b>			
<b>NOTE</b> – 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 identified as part of the non-compliance. The dewatering discharge to Northern Pits 1 and 2 and Central Pit is tracked via Water Cart run sheets where dewater is transferred.			
The requirement to capture data from the dewatering pipeline flow meters is likely to provide more accurate data for dewatering activity, though water cart run sheets effectively captures data.			
<b>Cause (or suspected cause) of non-compliance:</b>			
The non-compliance is the result of no flow meter being installed on the dewatering pipelines as required.			
<b>Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:</b>			
A works request has been submitted to the on-site maintenance team to install flow meters on the dewatering pipeline as soon as practical.			
<b>Was this non-compliance previously reported to DWER?</b>			
<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 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:	General manager
Date:		Date:	28/3/24
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.