



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:	L9195/2019/1	Licence file number:	DER2018/001608
Licence holder name:	Kirkalocka Gold SPV Pty Ltd		
Trading as:	Adaman		
ACN:	626 160 816		
Registered business address:	Level 3, 140 St Georges Terrace, Perth WA 6000		
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 included in an accompanying report.	
Prescribed premises category	Actual production quantity
Category 5 - Processing	1.92 Mt
Category 6 – Mine dewatering	N/A
Category 85 – Sewage Facility	N/A
Category 89 – Putrescible landfill	N/A

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 5 - Processing	1.92 tonnes of tailings
Category 6 – Mine dewatering	130,520 tonnes
Category 85 – Sewage Facility	3,142 m ³
Category 89 – Putrescible landfill	11.8 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:	20, 32	Date(s) of non-compliance:	01/2020 – 12/2020
Details of non-compliance:			
Four of the TSF 1 monitoring bores exceeded the reportable limit of 5 mbgl. License holder failed to report occurrence of bores (TDP8, TDP9, TDP11 and TDP13) exceeding the reportable limit of 5 mbgl within the 7-day time frame. (Note: exceedance occurred when operating under the Works Approval).			
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 visible environmental impacts to date.			
Cause (or suspected cause) of non-compliance:			
Seepage from TSF 1. Operational issues.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A Groundwater Monitoring Strategy and Seepage Management Plan was developed and submitted in accordance with Condition 22.			
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:	15, 12	Date(s) of non-compliance:	10/2020 – 11/2020
Details of non-compliance:			
CN _{WAD} and pH samples were not taken for the corresponding frequency in October and November.			
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 impacts apparent.			
Cause (or suspected cause) of non-compliance:			
Operational issues.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Ensure sample frequency is completed as specified in the licence condition. Site based environmental personnel employed in 2021.			
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: 02 / 12 / 20	

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:	11/2020
Details of non-compliance:			
WAD1 (TSF supernatant pond) exceeded limit of 50 mg/L CN _{WAD} in November 2020.			
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 impacts apparent.			
Cause (or suspected cause) of non-compliance:			
A preliminary investigation confirmed that primarily the increase in CN _{WAD} concentration was due to the reduction in size of the TSF1 supernatant volume (approximately halved) in hand with additional processing of transitional ores that have a variable CN consumption.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The processing team will continue to adjust cyanide levels in the plant until they have reached an operational steady state that falls back below the 50mg/L threshold in the TSF1 supernatant water.			
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: 02 / 12 / 20	

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, 12	Date(s) of non-compliance:	10/2020 – 12/2020
Details of non-compliance:			
<p>Monitoring data for the following parameters (pH, TDS, TRH and nitrate) were not taken during October, November and December 2020.</p> <p>Monitoring was not undertaken in October and November 2020 when actively discharging and using the corresponding method (health rating based on that documented in Section 7.1.2 of Kirkalocka Gold Project Strategy, prepared by Preston Consulting Pty Ltd, 15 February 2019).</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 apparent impact on the vegetation as seen in the imagery (section 9 of the report).			
Cause (or suspected cause) of non-compliance:			
Operational issues.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Discharges ceased on the 1 st of April for DP-A, DP-B, North WRL SB1 and TSF2 SB. Discharge flow rates significantly decreased in December for DP-C.			
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:	20	Date(s) of non-compliance:	10/2020
Details of non-compliance:			
Monitoring at some monitoring locations have not been carried out (see covering 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.			
No environmental impacts to date.			
Cause (or suspected cause) of non-compliance:			
TDP2 and TDP12 blocked. TDP1 and TDP5 no sample taken.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
TDP2 and TDP12 re-established in December 2020. Site based environmental personnel employed in 2021.			
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:	27	Date(s) of non-compliance:	12/2020
Details of non-compliance:			
Annual Environmental Report was submitted later than the 90-day period.			
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 environmental impacts – administrative issue.			
Cause (or suspected cause) of non-compliance:			
Operational issues.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Submit the next AER no later than 90 days after the end of the annual period.			
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: / /	

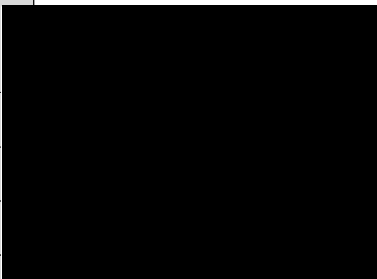
Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	31	Date(s) of non-compliance:	1/2020-7/2020
Details of non-compliance:			
WWTP exceedance of several parameters as set out in Table 8 of the license, failure to Notify the CEO within 7-days of an emission limit.			
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 environmental impacts to date.			
Cause (or suspected cause) of non-compliance:			
WWTP had difficulty handling flows, in turn the retention time was not long enough.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The facility was upgraded to a Tristar WWTP allowing a larger flow of 50 m ³ per day as opposed to 23 m ³ per day. L9195 amended in 2021 to include additional WWTP infrastructure (tertiary treatment plant).			
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:	35, 36	Date(s) of non-compliance:	12/2020
Details of non-compliance:			
WWTP Tristar chlorine emission was not monitored and recorded in December.			
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 environmental impacts to date.			
Cause (or suspected cause) of non-compliance:			
No lab data provided.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monitor all parameters. Site based environmental personnel employed in 2021.			
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 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 particular¹.

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:		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.