



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:	L9259/2020/1	Licence file number:	DER2020/000278
Licence holder name:	Golden Spur Resources Pty Ltd		
Trading as:	Golden Spur Resources Pty Ltd		
ACN:	161 329 933		
Registered business address:	Ground Floor, 24 Outram St, West Perth, WA, 6005		
Reporting period:	03 /11 /2022 to 02 /11 /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 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 6	279,724 kL
Category 52	0 MW
Category 54	90m ³ daily average 114m ³ daily maximum
Category 64	29 tonnes
Category 70	0 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		
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:	1	Date(s) of non-compliance:	6 March 2023
Details of non-compliance:			
15,000 L diesel spill from generator on to the ground and underneath the gensets. The soil surrounding the generators was excavated and removed, however the contaminated soil beneath the generators has remained in-situ and will continue to remain so until they are decommissioned when the overhead power lines are operational.			
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.			
Suspected contaminated land – Form 1 submitted and S.72 Unauthorised discharge of waste form submitted.			
APPENDIX A			
Cause (or suspected cause) of non-compliance:			
Failure on the internal tank bung and valve seal failure.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Solenoid valves installed on each individual transfer pump that open during fuel transfer only and closed at all other times. Bund level sensors to activate pump shut off. Permanent power plant is under construction.			
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: 07 / 03 / 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:	2	Date(s) of non-compliance:	November 2022 – May 2023
Details of non-compliance:			
Pipeline inspections were not carried out every 12 hours and no records of inspections were kept prior to May 2023.			
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.			
There was no environmental impact resulting from the non-compliance. Map provided in APPENDIX B.			
Cause (or suspected cause) of non-compliance:			
Department responsible for pipeline inspections were not aware they were required 12 hourly and that inspections needed to be recorded.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Responsible department advised of the requirement and supplied with a pipeline inspection record form to complete each inspection.			
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:	2	Date(s) of non-compliance:	19 th October 2023
Details of non-compliance:			
Waste dumped in front of trench instead of inside the trench.			
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.			
Environmental impact was negligible as the waste was pushed into the trench with the loader and windblown rubbish was collected.			
Map provided in APPENDIX C.			
Cause (or suspected cause) of non-compliance:			
Bund too high for trailer to tip over / trailer not designed for tipping over bunds			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Design trench to reverse inside to tip waste. Bellevue has recently amended the licence to include a location change for the landfill, the new landfill site will ensure easier access into trenches.			
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:	3	Date(s) of non-compliance:	6 th October 2023
Details of non-compliance:			
Waste not covered within a fortnight period causing windblown rubbish.			
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.			
Environmental impact was negligible as the waste was collected and the waste was covered a few days after. Map provided in APPENDIX C.			
Cause (or suspected cause) of non-compliance:			
Lack of available resources.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Increase site resources by training additional personnel on earthmoving equipment to enable waste to be covered more frequently.			
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:	4	Date(s) of non-compliance:	30 June 2023
Details of non-compliance:			
Construction of pit monitoring bores WPBEMB01 and HEN01 were not completed prior to the date (30 June 2023) outlined in the Licence.			
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.			
Environmental impact is negligible as discharge to the pits was kept below the freeboard limit and diverted to a different pit once water levels rose in another.			
Cause (or suspected cause) of non-compliance:			
Unable to secure drilling company to complete construction of the monitoring bores.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Secure drilling company as soon as possible to complete drilling of monitoring bores. Monitoring bores were subsequently drilled and completed in July 2023, with construction report sent to DWER in August 2023 (Appendix D and E).			
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: 20 / 06 / 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:	10	Date(s) of non-compliance:	October 2023/ November 2023
Details of non-compliance:			
12 th and 30 th October 2023 – Total Nitrogen limit exceeded 30 th October 2023 – TSS limit exceeded 4 th , 5 th , 16 th , 18 th , 20 th , 21 st , 28 th , 29 th , 30 th , 31 st October 2023, 1 st November 2023 – Residual Chlorine range (0.2-2.0 mg/L) exceeded (Refer Table 7 of Annual 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.			
Environmental impact was negligible as the vegetation health in the spray field has remained in good condition, showing no sign of decline. Map provided in APPENDIX F.			
Cause (or suspected cause) of non-compliance:			
Site personnel becoming familiar with operational requirements of new WWTP system. Higher than required sludge density reduced the efficiency of its operation resulting in fluctuations in the nitrogen levels in analysis. Advice from the manufacturer suggests that the fluctuations reflect the ramping up and down of chemical dosing in the treatment process.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Site personnel seek regular advice from the Manufacturer regarding the operation of the wastewater treatment plant and troubleshooting issues as they occur. A large quantity of sludge has been removed which is expected to improve the function of treatment process. Ongoing management of the facility will continue to assess sampling results and determine operational requirements to ensure analyte levels meet Licence conditions. Additional equipment is being sourced to support and improve the function of the WWTP, such as dewatering equipment or similar that will reduce ongoing sludge levels.			
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:	November 2022 – July 2023
Details of non-compliance:			
<p>Total Dissolved Solids (TDS) for the monitoring bores were not analysed by an NATA accredited lab until August 2023, as required by Condition 12, and was analysed using an in-field water quality meter.</p> <p>TDS results for MB05 in March 2023 to May 2023 were recorded in Electrical Conductivity due to limitations of the meter. A sample from MB05 could not be obtained in June 2023 due to equipment failure and site-based resources were not available in July 2023.</p> <p>The Henderson Pit Monitoring Bore (HEN01) and Westralia Pit Monitoring Bore (WPBE-MB01) were constructed in July 2023. DWER was notified in June 2023 of the pending non-compliance with Condition 4 as the bores would not be constructed by 30 June 2023 as suitable drilling contractors were not available prior to this date.</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.			
<p>Environmental impact was negligible as HEN01 and WPBEMB01 were only constructed at the end of July 2023 and MB05 was monitored from March 2023 using an in-field water quality meter.</p> <p>Map provided in APPENDIX G.</p>			
Cause (or suspected cause) of non-compliance:			
Administrative error with regards to requirements of Licence condition. A suitable drilling contractor was not able to be bought to site to meet the 30 June deadline.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Additional site-based environmental personnel employed from March 2023 onwards to manage on-site compliance requirements. A review of Licence conditions has been completed to address knowledge gaps and improvements to procedures completed to ensure the necessary samples are sent for NATA laboratory as is required.			
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:	14	Date(s) of non-compliance:	November 2022 – November 2023
Details of non-compliance:			
No individual flow meters on discharge pipelines for Henderson Pit, Westralia Pit and Vanguard Pit. Dewater discharge is measured by flow meter on the trunk line and noted when the flow is diverted to a different pit.			
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.			
There was no environmental impact because of the non-compliance as the discharge flow is still measured and discharge to each pit can be calculated by using the notes of flow direction. Map provided in APPENDIX B.			
Cause (or suspected cause) of non-compliance:			
Long lead time for procuring additional suitable flow meters required strategic placement (ie, on the main trunk line) of the available flow meters.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Flow meters for each discharge point were ordered and have been installed in late December 2023. This will be reflected in the next reporting period AER.			
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:	17	Date(s) of non-compliance:	November 2022 – March 2023
Details of non-compliance:			
<p>Standing Water Level (SWL) was not measured at MB05 in each month of the reporting period, the below months were not measured:</p> <ul style="list-style-type: none"> • November 2022 • December 2022 • January 2023 • February 2023 			
<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>Negligible as MB05 is a monitoring bore for the Vanguard Pit which had a low SWL during that period (due to dewatering and mining) and the surrounding area would not have been vulnerable to mounding.</p> <p>Map provided in APPENDIX G.</p>			
Cause (or suspected cause) of non-compliance:			
Lack of available site resources			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Additional site-based environmental personnel employed from March 2023 onwards to manage on-site compliance requirements			
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:	17	Date(s) of non-compliance:	August 2023 to November 2023
Details of non-compliance:			
Standing Water Level (SWL) at WPBEMB01 exceeded the 5mbgl SWL limit in each monthly period since construction of the monitoring bore.			
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.			
Negligible as bore construction records show WPBEMB01 SWL was already sitting just below 5mbgl. Map provided in APPENDIX G.			
Cause (or suspected cause) of non-compliance:			
SWL limit specified in Licence did not consider the natural water table would already be sitting above 5mbgl. Location of the monitoring bore within the landscape is near to Lake Miranda, therefore is it reasonable to consider that the natural watertable level would be relatively shallow given the bores location.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Bellevue will be initiating conversations with the DWER regarding this licence condition, as the natural ground water in the area is less than 5mbgl. Bellevue has commenced hydrogeological investigations in the area and has installed additional monitoring bores to improve understanding of groundwater movements in the area.			
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:	General Manager	Position:	
Date:	26 January 2024	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.