



## Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L9309/2021/1	Licence file number:	INS-0002039 (formally DER2021/000518)
Licence holder:	Butcherbird Operations Pty Ltd		
Trading as:	Element 25 Limited		
ACN:	684 395 748		
Registered address:	Level 1, Building B Garden Office Park Osborne Park WA 6017		
Reporting period:	1/12/2024 to 30/11/2025		

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 at Section F.</li></ul>

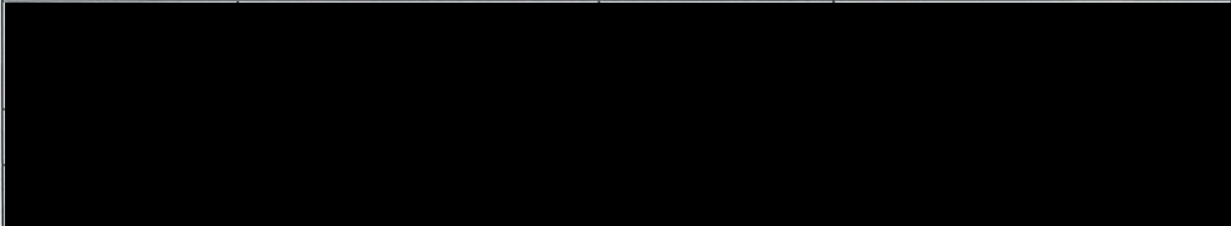
Section C – Statement of Actual Production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Production Quantity
05	0 Tonnes

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
N/A	N/A

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 (Table 2)	Date(s) of non-compliance:	December 2024. Months of May, June, August, and October 2025.
Details of non-compliance:			
Groundwater monitoring was not completed for all designated monitoring bores in December 2024 or during May, June, August, and October 2025, representing non-compliance with monitoring requirements.			
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.			
The environmental risk associated with the missed monitoring events is considered low, as no operational activities with the potential to adversely impact groundwater quality were occurring during the care and maintenance period, and historical monitoring data indicate stable groundwater conditions.			
Cause (or suspected cause) of non-compliance:			
Missed monitoring occurred during the transition of monitoring responsibilities to the care and maintenance team, during which personnel capacity was constrained. Concurrent site management priorities associated with the establishment of care and maintenance arrangements further limited the availability of personnel.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Corrective actions have since been implemented, including clarification of monitoring responsibilities, allocation of dedicated resources, and integration of groundwater monitoring requirements into the care and maintenance schedule. Monitoring personnel availability has been stabilised, and procedures have been updated to ensure ongoing compliance. Conditions of Licence L9309/2021/1 have now been formally amended to recognise the changes in monitoring requirements during care and maintenance, and all required monitoring will be undertaken in accordance with the approved parameters and frequencies of this licence going forward.			
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: / /	

**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.



Date:	19/12/2025	Date:	
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.

