



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:	L91414/2023/1	Licence file number:	DER2014/001259-1-8
Licence holder name:	Billabong Gold Pty Ltd		
Trading as:	CATALYST (PLUTONIC) PTY LTD		
ACN:	613 900 922		
Registered business address:	Level 1, 30 Richardson Street, West Perth, WA 6005		
Reporting period:	01/01/2024 to 31/12/2024		

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); andsign 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; andsign 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
5 - Processing or beneficiation of metallic or non-metallic ore (>50,000 t/yr but less than 5,000,000 t/yr)	1,390,340 t
6 - Mine dewatering (>50,000 t/yr but less than <1,300,000 t/yr)	1,026,545 kL
52 - Electric power generation (20 MW or more in aggregate (using natural gas) or 10 MW or more in aggregate (using a fuel other than natural gas) but <27.2 MW natural gas.	6.56 MW natural gas 0.33 MW diesel
54- Sewage facility	51 m ³ /day

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
57 - Used tyre storage (general) (>100 tyres but <200)	577 tyres in total during 2024
89 - Class II putrescible landfill site (>20 t/yr but <5,000 t/yr)	104 t

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
5 – Processing or beneficiation of metallic or non-metallic ore (>50,000 t/yr but less than 5,000,000 t/yr) – TSF2 and TSF3 emission points	1,390,340 t
6 – Mine dewatering (total >50,000 t/yr but <1,300,000 t/yr) – W1 emission point	115,381 kL
6 – Mine dewatering (total >50,000 t/yr but <1,300,000 t/yr) – W2 emission point	24,249 kL
52 – Electric power generation (20 MW or more in aggregate (using natural gas) or 10 MW or more in aggregate (using a fuel other than natural gas) but <27.2 MW natural gas) – A1-9 emission points	6.56 MW natural gas 0.33 MW diesel
54 – Sewage facility (>100 m ³ /day but <140 m ³ /day) – L1 emission point	51 m ³ /day
57 – Used tyre storage (general) (>100 tyres but <200) – tyre waste inputs	577 tyres
89 – Class II Putrescible landfill site (>20 t/yr but <5,000 t/yr) – landfill waste inputs	104 t

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:	01/06/2024 - 31/09/2024
Details of non-compliance:			
From May through August 2024, up to 396,740 kL of groundwater abstracted from Plutonic East Pit was periodically discharged to Salmon Pit Lake.			

Section E – Details of non-compliance with licence condition	
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.	
Laboratory results from June and August 2024 indicate a general decline in water quality at the W2 discharge point, associated with a changed chemical composition at Salmon Pit due to mixing with groundwater abstracted from Plutonic East Pit.	
Notable changes since February 2024 include a significant increase in salinity (620 mg/L to 1,200 mg/L TDS) and concentrations of sulphate (112 mg/L to 590 mg/L) and elevated levels of metals (e.g. Sb, As, Co, Ni, Se, and Zn) that have historically remained below their respective limits of reporting. Concentrations of Ni, Se and Zn exceeded the ANZG (2018) 90% species protection DGVs.	
Cause (or suspected cause) of non-compliance:	
At the time, the piping infrastructure did not allow dewatering discharge to be directed to Salmon Pit North. Salmon Pit North and Salmon Pit Lake are separated by approximately 250 m of existing disturbance, consisting of a series of batters, berms, and backfill material. Salmon Pit North contains a significantly larger volume of water, providing greater buffering capacity and dilution potential for discharged water, and it typically remains isolated from Salmon Pit Lake.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
Since August, groundwater abstracted from Plutonic East Pit has been re-used underground or discharged to Plutonic East Turkey's Nest with any excess discharged to Laterite Pit.	
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:	18	Date(s) of non-compliance:	01/06/2024 - 31/09/2024
Details of non-compliance:			
Flowmeter discharge volumes were not recorded monthly at emission point W2 due to the meter being out of service in June, July, August, and September.			
In October 2024, it was replaced along with a failed shutoff valve, which had allowed water to continue discharging.			

Section E – Details of non-compliance with licence condition	
<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>Condition 14 stipulates that W2 is to receive pit water from Salmon Pit Lake only. From May through August 2024, up to 396,740 kL of groundwater abstracted from Plutonic East Pit was periodically discharged to Salmon Pit.</p>	
<p>Cause (or suspected cause) of non-compliance:</p>	
<p>Flowmeter and shutoff valve malfunction, with maintenance/replacement not completed within a sufficient timeframe.</p>	
<p>Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:</p>	
<ul style="list-style-type: none"> • Raise a maintenance request for flowmeter servicing and replacement of malfunctioning flowmeters. • Implement a regular maintenance program for flowmeters. • Train processing staff in the importance of working flow meters and potential non-compliance to approval conditions. 	
<p>Was this non-compliance previously reported to DWER?</p>	
<p><input type="checkbox"/> Yes, and</p>	
<p><input type="checkbox"/> Reported to DWER verbally</p>	<p>Date: / /</p>
<p><input type="checkbox"/> Reported to DWER in writing</p>	<p>Date: / /</p>

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:	01/01/2024 - 28/02/2024
---------------	----	----------------------------	-------------------------

Details of non-compliance:

Inert Waste Type 1 (industrial waste) disposed to the Main industrial landfill was not recorded January to February.

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 impact observed.

Cause (or suspected cause) of non-compliance:

The logbook at the entry of the facility to record deposits was lost and not replaced.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

Waste management record keeping and reporting has been maintained by the site Senior Environmental Advisor, who was employed in March.

Was this non-compliance previously reported to DWER?

☐ Yes

☐ Reported to DWER verbally

Date: / /

☐ 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:	01/03/2024 - 31/12/2024
Details of non-compliance:			
<p>Flowmeter readings were not recorded monthly at seepage recovery bores RB01, RB02, RB03, and RB04.</p> <p>Construction of these bores was completed in February 2024. Flowmeters were installed at same time as submersible pumps and bore headworks in March/April.</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>			
No environmental impact observed.			
Cause (or suspected cause) of non-compliance:			
The processing department were not aware of this specific monitoring requirement. This requirement is a new condition set out in the Licence issued in 2023.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Ensure all relevant departments are aware of new approval conditions and those which relate to any newly constructed infrastructure.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes			
<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:	01/07/2024 - 31/12/2024
---------------	----	----------------------------	-------------------------

Details of non-compliance:

Laboratory analyses were not completed in Q3 and Q4 at TSF monitoring bores TD1-2, TD1-5, TD2-1, TD2-3, TD3-2, TD3-7.

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 impact observed.

Cause (or suspected cause) of non-compliance:

The frequency of laboratory analysis for these monitoring sites was mistakenly entered as 6-monthly in a new internal site wide monitoring schedule. This has since been rectified.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

A quality assurance and quality control process is implemented for future updates to internal monitoring programs.

Was this non-compliance previously reported to DWER?

☐ Yes

☐ Reported to DWER verbally

Date: / /

☐ 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:	01/07/2024 - 31/12/2024
---------------	----	----------------------------	-------------------------

Details of non-compliance:

Photo monitoring was not completed for W1 and W2 discharge points during Q3 and Q4.

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 impact observed.

Cause (or suspected cause) of non-compliance:

The frequency of photo monitoring was mistakenly entered as 6-monthly in a new internal site wide monitoring schedule. This has since been rectified.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

A quality assurance and quality control process is implemented for future updates to internal monitoring programs.

Was this non-compliance previously reported to DWER?

☐ Yes

☐ Reported to DWER verbally

Date: / /

☐ 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:	29	Date(s) of non-compliance:	17/11/2024
Details of non-compliance:			
The Stage 9 TSF 2 Embankment Raise Environmental Compliance Report was not submitted within 30-days of the completion of construction. Construction was completed on 17/10/2024 and the report was submitted 18/12/2024.			
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 impact observed.			
Cause (or suspected cause) of non-compliance:			
There was a delay in submission due to internal processes.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Reporting deadlines to be entered into INX so reminders are sent to relevant staff before the due date.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 28/01/2025	

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:	29	Date(s) of non-compliance:	01/01/2024 - 28/02/2024
---------------	----	----------------------------	-------------------------

Details of non-compliance:

A partial compliance letter for the TSF 3 Stage 9 embankment raise was received on 12 February 2024 (Ref: DWERT13704~23). The letter outlined that Licence conditions relating to deposition pipelines, water recovery pipelines, spigots and flow meters not addressed in the submitted TSF construction report.

This information was not initially supplied within the TSF 3 Stage 9 embankment raise report as the relevant infrastructure had not been fully constructed at the time of report finalisation. This was noted to DWER in email correspondence dated 16 February 2024, and an extension of time to construct the remaining infrastructure and address the outstanding items was granted to 30 April 2024.

An Environmental Compliance Report (ECR) detailing the required construction details was submitted to DWER 30 April 2024. On 12 June 2024, DWER determined that the ECR met the requirements of conditions 11, 12, and 29.

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 impact observed.

Cause (or suspected cause) of non-compliance:

The relevant infrastructure had not been fully constructed at the time of report finalisation.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

Any installation or construction of deposition and water recovery pipeline occurring subsequent to embankment raise construction are documented and reported as required under the Licence.

Was this non-compliance previously reported to DWER?

☒ Yes

☐ Reported to DWER verbally

Date: / /

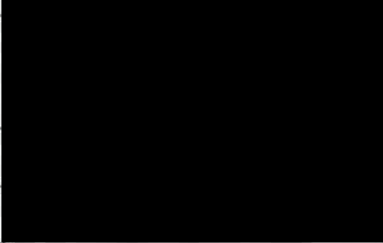
☒ Reported to DWER in writing

Date: 16/02/2024

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:		14 / 4 / 2025.	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.