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Private and confidential

Manager - Industry Regulation (Resources North)
Department of Water and Environmental Regulation
Regulatory Services - Environment
Prime House, 8 Davidson Terrace
JOONDALUP WA 6027

28 April 2026

Our reference: RTIO-1147969
Your reference: L9419

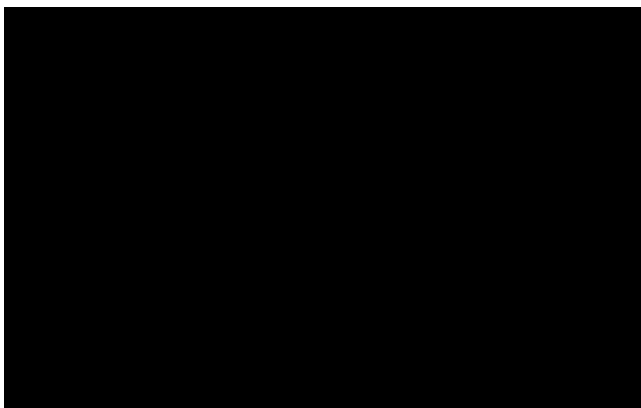
To whom it may concern

2025 Annual Audit Compliance Report for L9419 – Pannawonica Deepdale Landfill

Attached is the 2025 Annual Audit Compliance Report (AACR) for the Pannawonica Deepdale Landfill as required by Condition 10(b) of L9419/2023/1.

This AACR covers the reporting period from 1 January to 31 December 2025.

Please contact [REDACTED], Principal Operational Performance, at [REDACTED] if you have any queries.



Annual Audit Compliance Report form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence Number:	L9419/2023/1	Licence File Number:	DER2023/000731
Licence Holder:	Robe River Mining Co. Pty. Ltd.		
Trading as:	Robe River Mining Co. Pty. Ltd.		
ACN:	008 694 246		
Registered address:	Level 18, Central Park. 152-158 St. Georges Terrace, PERTH WA 6000		
Reporting period:	1 January 2025 to 31 December 2025		

Section B – Statement of compliance with licence conditions	
Did you comply with all of your licence conditions during the reporting period?	
Yes <input type="checkbox"/>	Please complete Sections C, D (if required) and sign the declaration in Section E
No <input checked="" type="checkbox"/>	Please complete Sections C, D (if required), F and sign the declaration in Section E

Section C – Statement of actual production		
Provide the actual production quantity for this reporting period.*		
Category	Premises description	Actual production quantity (2025)
62	Solid waste depot	8150 tonnes
64	Class II or III putrescible landfill site	84 tonnes

*Supporting information provided in the relevant conditions of the 2025 Annual Environment Report

Section D – Statement of actual Part 2 waste discharge quantity		
Provide the actual Part 2 waste discharge quantity for this reporting period.		
Category	Premises description	Actual Part 2 waste discharge quantity (2025)
Not Applicable – no categories relevant to Part 2 waste discharge quantity.		

Section E – Declaration	
I declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular ¹ .	
I consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.	

Date:	28 April 2026
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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.

Section F – 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 number:	2	Date(s) of non-compliance:	31/12/2025
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Details of non-compliance:

During the reporting period, more than 100 tyres were accepted onto the premise and stored.

What was the actual (or suspected) environmental impact of the non-compliance?

There was no evidence of adverse environmental impact associated with the acceptance of more than 100 tyres for storage as they are classified as inert waste and will be removed from site for recycling.

Cause (or suspected cause) of non-compliance:

Due to agreements with Traditional Owners, the burying of tyres within the Pannawonica Deepdale landfill is currently not accepted, so storage is the only location where these tyres can be accepted at the landfill. The tip attendees were not aware that storing more than 100 tyres at a time was a non-compliance with Licence 9419 and continued to accept tyres for storage.

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

There were no adverse effects associated with the non-compliance requiring mitigation. In any case, the following actions have been taken to prevent recurrence:

- A licenced waste vendor was engaged and has removed stored tyres from site for recycling; and
- Waste acceptance guidance will be developed to assist in upskilling tip attendees around the types and volumes of waste that can be accepted.

Was this non-compliance reported to the DWER?

Yes:

Reported to DWER verbally

Reported to DWER in writing

No

Section F – 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 number:	3	Date(s) of non-compliance:	31/12/2025
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Details of non-compliance:

Scrap metal and tyres were not stored in appropriate containers or a quarantined storage area.

What was the actual (or suspected) environmental impact of the non-compliance?

There was no evidence of adverse environmental impact associated with the improper storage as these wastes are segregated and are classified as inert wastes and will be removed from site for recycling.

Cause (or suspected cause) of non-compliance:

Tip attendees were unaware that these tyres and scrap metal had to be stored in containers or within a constructed quarantined storage area and did not direct disposal personnel to store these appropriately within the landfill facility.

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

There were no adverse effects associated with the non-compliance requiring mitigation. In any case, the following actions have been taken to prevent recurrence:

- A licenced waste vendor has been engaged to remove stored materials off site for recycling;
- Bins for collection of scrap steel and tyres will be ordered and kept at the facility to ensure no waste is accepted without a storage container; and
- Waste acceptance guidance will be developed to assist in upskilling tip attendees around the storage requirements for tyres and scrap metal.

Was this non-compliance reported to the DWER?

Yes:

Reported to DWER verbally

Reported to DWER in writing

No

Section F – 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 number:	4	Date(s) of non-compliance:	31/12/2025
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Details of non-compliance:

- 1 – The tipping area was not restricted to a maximum linear length of 30 metres;
- 2 – Waste was placed outside of a defined cell or an area enclosed by earthen or other bunds;
- 3 – The active landfill had an exposed face of waste exceeding 2 metres in vertical height; and
- 4 – More than 100 tyres were stored above ground at the storage area – refer to Condition 2 above.

What was the actual (or suspected) environmental impact of the non-compliance?

- 1 – There was no evidence of adverse environmental impact associated with the tipping area exceeding a linear length of 30 metres as no windblown waste escaped the facility.
- 2 – There was no evidence of adverse environmental impact associated with waste being placed outside of a defined cell as no windblown waste escaped the facility.
- 3 – There was no evidence of adverse environmental impact associated with exposed face exceeding 2 metres in vertical height as no windblown waste escaped the facility.
- 4 – Refer to Condition 2 above

Cause (or suspected cause) of non-compliance:

- 1 – 3 The team managing the landfill had only one qualified operator for earthmoving equipment and following personnel changes, no qualified operator was available to push up and cover waste using the appropriate machinery available at the landfill.
- 4 – Refer to Condition 2 above.

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

- 1 – 3 There were no adverse effects associated with the non-compliance requiring mitigation. In any case, to prevent recurrence at least two operators will be trained to operate the appropriate machinery available at the landfill.
- 4 – Refer to Condition 2 above.

Was this non-compliance reported to the DWER?

- | | |
|---|--|
| <input type="checkbox"/> Yes:
<input type="checkbox"/> Reported to DWER verbally
<input type="checkbox"/> Reported to DWER in writing | <input checked="" type="checkbox"/> No |
|---|--|

Section F – 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 number:	5	Date(s) of non-compliance:	31/12/2025
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Details of non-compliance:

Putrescible wastes were not covered as soon as practicable or within a week upon receipt.

What was the actual (or suspected) environmental impact of the non-compliance?

Although putrescible waste was not covered within a week upon receipt, there was no windblown waste that had escaped the facility.

Cause (or suspected cause) of non-compliance:

The team managing the landfill had only one qualified operator for earthmoving equipment and following personnel changes, no qualified operator was available to push up and cover waste using the appropriate machinery available at the landfill.

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

There were no adverse effects associated with the non-compliance requiring mitigation. In any case, to prevent recurrence at least two operators will be trained to operate the appropriate machinery available at the landfill.

Was this non-compliance reported to the DWER?

- | | |
|---|--|
| <input type="checkbox"/> Yes:
<input type="checkbox"/> Reported to DWER verbally
<input type="checkbox"/> Reported to DWER in writing | <input checked="" type="checkbox"/> No |
|---|--|

Section F – 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 number:	12	Date(s) of non-compliance:	31/12/2025
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Details of non-compliance:

Accurate books were not maintained during the reporting period. While daily inspections of the landfill were undertaken, a review of inspection records against observed site conditions identified that the records did not accurately reflect the management and operational status of the facility.

What was the actual (or suspected) environmental impact of the non-compliance?

No suspected environmental impact occurred. Daily inspections continued to be undertaken, and no impacts to land, water or the surrounding environment were identified during the reporting period.

Cause (or suspected cause) of non-compliance:

Accurate books were not maintained due to a lack of clarity in inspection documentation requirements and insufficient oversight to ensure that recorded inspections accurately reflected site conditions.

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

There were no adverse effects associated with the non-compliance requiring mitigation. In any case, the following actions have been taken to prevent recurrence:

- Site personnel responsible for inspections will be provided with refresher training on inspection and record-keeping requirements, with emphasis on accurate reflection of site conditions; and
- Record-keeping practices will be reinforced to ensure inspection documentation is completed accurately and retained in accordance with licence and regulatory requirements.

Was this non-compliance reported to the DWER?

Yes:

Reported to DWER verbally

Reported to DWER in writing

No