



Government of **Western Australia**
Department of **Water and Environmental Regulation**

Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

| Section A – Licence Details | | | |
|-----------------------------|----------------------------|----------------------|---------------|
| Licence number: | L8435/2010/3 | Licence file number: | 2011/000299-3 |
| Licence holder: | GSM Mining Company Pty Ltd | | |
| Trading as: | GSM Mining Company Pty Ltd | | |
| ACN: | 165 235 030 | | |
| Registered address: | [REDACTED] | | |
| 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; 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 at 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 | 1,571,334 tonnes/year |

| 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 |
| 6 | 7,125,197 kL/year |
| 54 | 150.97 m ³ /day |
| 64 | 893 tonnes/year |

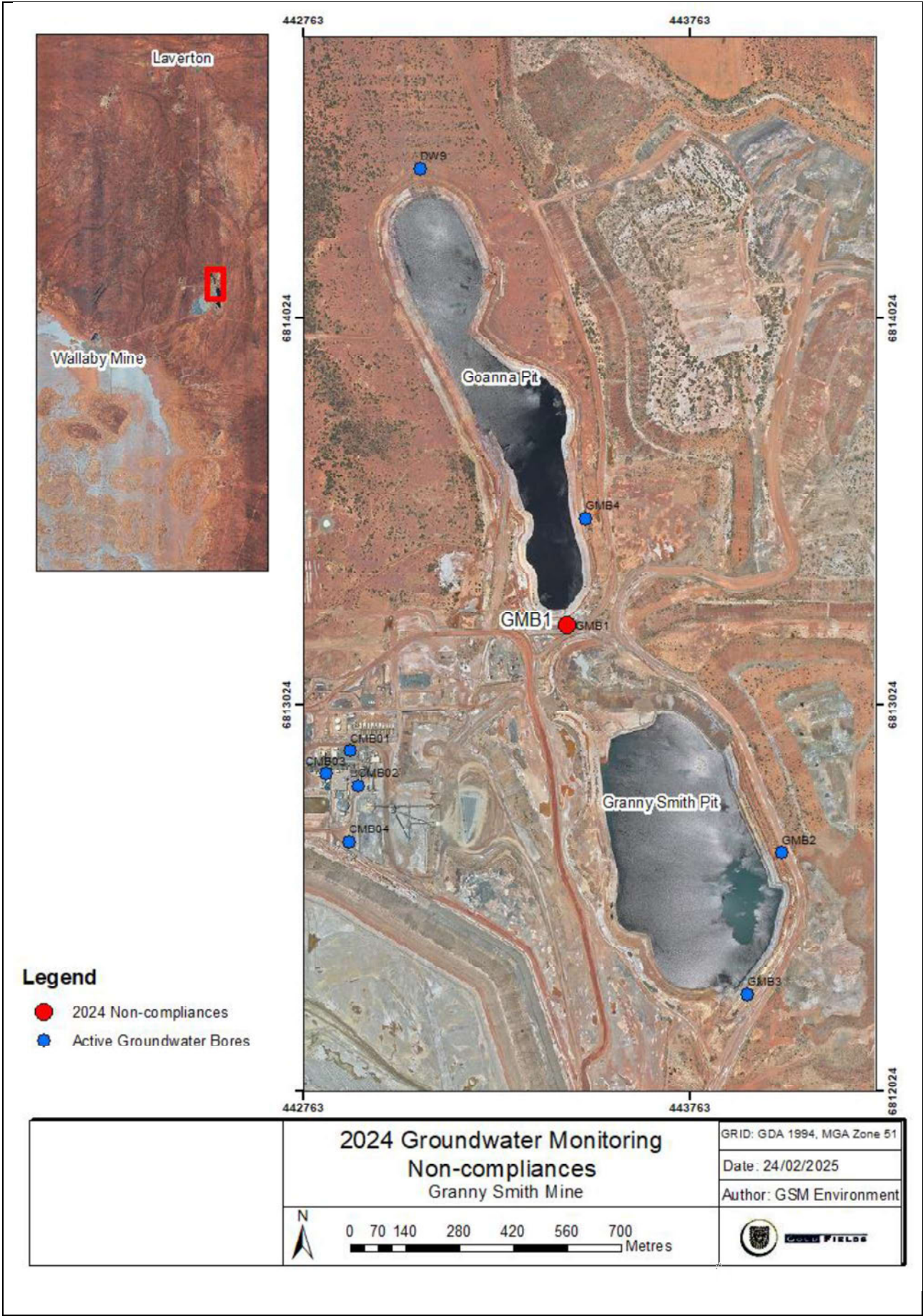
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| Section E – Details of Non-Compliance with Licence Condition | | | |
|--|-------------|----------------------------|---------|
| Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period. | | | |
| Condition no: | Category 73 | Date(s) of non-compliance: | Q4 2024 |
| Details of non-compliance: | | | |
| <p>Following an internal review process, GSM has identified a non-compliance with the approved design capacity for the bulk storage of chemicals prescribed under Category 73.</p> <p>The design capacity of the installed infrastructure associated with the project is 3,072.4m³ where the assessed design capacity is 3,004m³.</p> | | | |
| What was the actual (or suspected) environmental impact of the non-compliance? | | | |
| <p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>There is no potential for environmental harm or pollution to occur and no actual environmental harm or pollution has occurred to date. All containment structures have been designed and commissioned with appropriate infrastructure and bunding, in line with the requirements under the Dangerous Goods Safety Act 2004 (WA) and AS 1940-2004: The storage and handling of flammable and combustible liquids.</p> | | | |
| Cause (or suspected cause) of non-compliance: | | | |
| <p>The primary cause of the increase is related to infrastructure upgrades or new projects; for example, it has been identified that when aging infrastructure related to the storage of diesel in the Wallaby project area was replaced, it was replaced with a larger vessel</p> | | | |
| Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: | | | |
| <p>Regular inspection schedules are in place to maintain the structural integrity of the facility and ensure that any loss of containment is reported immediately. To address this potential non-compliance, GSM intends to amend the Licence, specifically to increase the design capacity of the bulk storage facility by approximately 10% to 3300m³, to allow for future infrastructure replacement.</p> | | | |
| 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: 31/01/2025 | |

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| 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: | 25 | Date(s) of non-compliance: | Q4 2024 |
| Details of non-compliance: | | | |
| <p>The following monitoring bore was partially non-compliant to the monitoring schedule outlined in Table 14 of the licence;</p> <ul style="list-style-type: none">GMB1: the sample for the quarterly monitoring was not taken due to installed infrastructure failing. | | | |
| 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>There is no suspected environmental impact of the non-compliance; the remaining monitoring bores around the Goanna Pit were sampled and the data trends are stable for all analytes.</p> <p>See map below for spatial context of monitoring network.</p> | | | |

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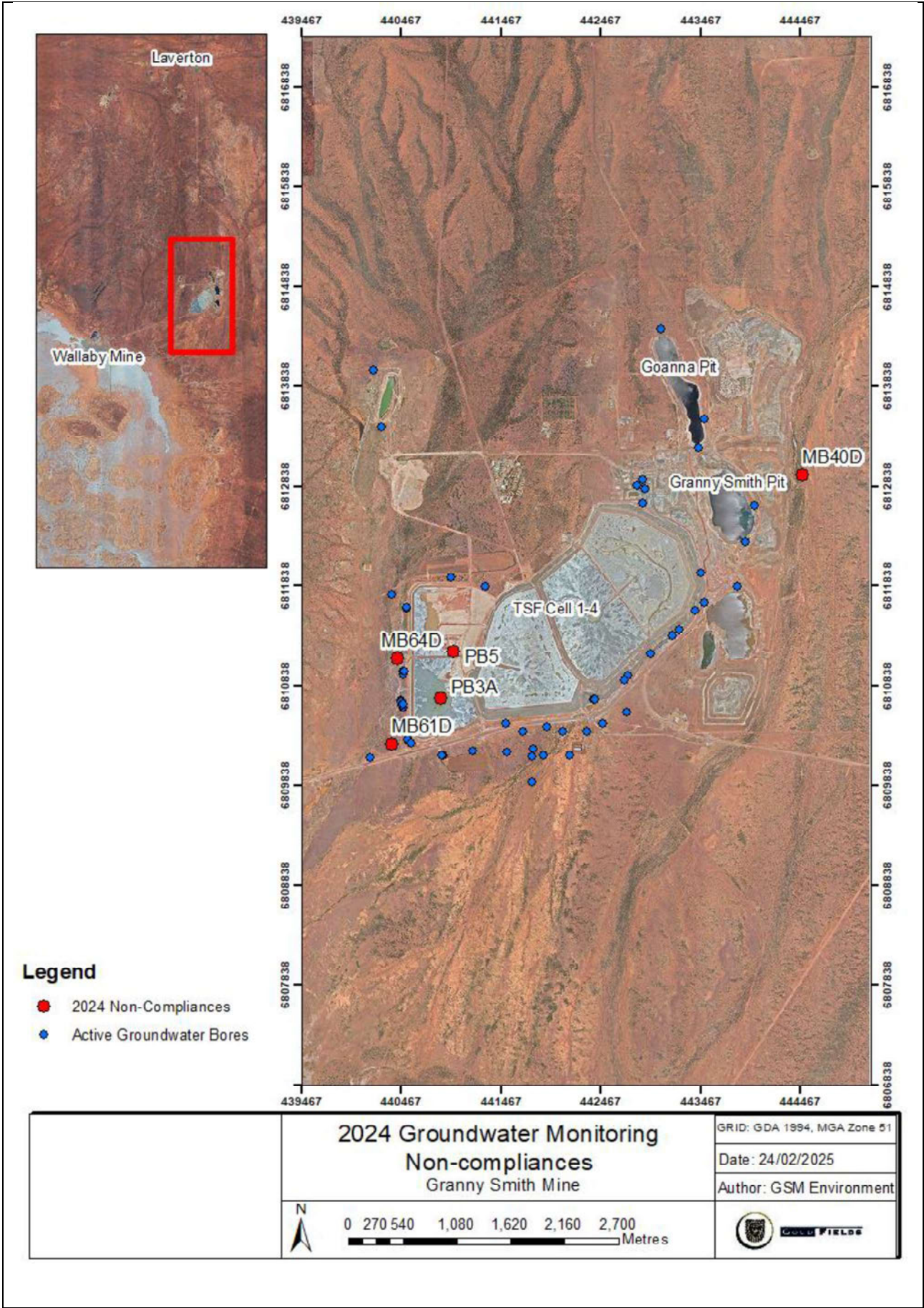
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| | |
|---|-----------------|
| Cause (or suspected cause) of non-compliance: | |
| The installed pump has detached from the casing and is lodged part way down the monitoring bore, making it not possible to collect the sample. | |
| Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: | |
| Investigations into recovery of the pump will occur in Q1 2025, and if determined to be impossible then alternatives, including redrilling of a representative monitoring bore, will be considered. | |
| 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: / / |

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| 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: | 28 | Date(s) of non-compliance: | Multiple |
| Details of non-compliance: | | | |
| <p>The following monitoring bores were partially non-compliant to the monitoring schedule outlined in Table 17 of the licence.</p> <ul style="list-style-type: none"> • MB40: SWL and water quality readings missed in Q1-4 due to blockage in bore, installed infrastructure failure. • MB61D: SWL readings were missed in Q1 and Q2 due to an administrative error. • MB61S: SWL readings were missed in Q2 due to an administrative error. • MB64D: SWL and water quality missed in Q1 and Q2 due to blockage in bore. • PB3A: SWL and water quality unable to be sampled in Q1 and Q2. • PB5: SWL readings were unable to be taken for Q1 through to Q4, and water quality samples were unable to be taken in Q1 and Q3 when the bore was not operating at the time of sampling program. | | | |
| What was the actual (or suspected) environmental impact of the non-compliance? | | | |
| <p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> | | | |
| <p>There is no suspected environmental impact of the non-compliance, as there is redundancy in the monitoring program with alternative monitoring locations within proximity to allow analysis of the overarching groundwater conditions.</p> <p>See the map below for comparison of the non-compliance locations in relation to the existing active monitoring network.</p> | | | |

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| Cause (or suspected cause) of non-compliance: | |
| <ul style="list-style-type: none">• Aging installed infrastructure in monitoring wells, degradation of tubing results in pump detachment.• Administrative errors and procedural failures.• Limited options for access to production bore infrastructure, risk of entanglement with installed pump; only able to sample when operational. | |
| Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: | |
| <ul style="list-style-type: none">• The internal QAQC process revised to ensure completeness of data.• Maintenance complete for all installed pumps on monitoring bores in 2024, replacing tubing and connecting stainless steel cable to ensure pumps can be recovered. | |
| 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: 31/01/2025 |

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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 ¹ . 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: | 28-Feb-2025 10:14 AM AWS | 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.