

Department of Water and Environmental Regulation

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:	4611/1987/11	Licence file number:	2012/006836-1
Licence holder name:	Agnew Gold Mining Company Pty Ltd		
Trading as:	Agnew Gold Mining Company Pty Ltd		
ACN:	098 385 883		
Registered business address:	Level 4, 235 St Georges Terrace PERTH WA 6000		
Reporting period:	01 / 01 / 2025 to 31 / 12 / 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"> • 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
5 Processing or beneficiation of metallic or non-metallic ore)	1,201,788 tonnes
6 Mine dewatering	1,064,422 kL

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
85 Sewage Facility	Waroonga Biomax - 33.5 m ³ per day (12,227.5 m ³ annual)

Department of Water and Environmental Regulation

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
	Village WWTP – 136.1 m ³ per day (49,676.5 m ³ annual)
89 Putrescible landfill site	3,580 tonnes

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:	01/01/2025 – 31/12/2025
Details of non-compliance:			
AGMC failed to complete weekly inspections of the Waroonga Sprayfield, as specified by Table 1: Infrastructure and equipment requirements.			
Condition 1, Table 1 required <i>“Irrigation Area must be inspected weekly to ensure no surface runoff”</i> . While inspections were completed to this intent across the reporting period, inspections records were inconsistently maintained, and the weekly temporal requirement was not met throughout the current reporting period.			
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 actual nor suspected environmental impact as a result of this non-compliance.			
The Waroonga Sprayfield was still inspected on a regular basis during the current reporting period, with irrigation discharge points altered to prevent surface water pooling, and no instances reported of surface water runoff outside the irrigation footprint.			
The non-compliance is purely temporal in nature, with the intent of the inspection completed to an acceptable standard during the current reporting period.			
Cause (or suspected cause) of non-compliance:			
The cause of non-compliance has been largely attributed to insufficient area ownership, understanding and change management. The Waroonga Biomax facility has been under the ownership and control of Mining Maintenance, Camp Maintenance and now the Biomax contractors, all during the current reporting period.			
The inspection requirements of Condition 1, Table 1 were not understood, nor known of, by responsible departments/contractors during the current reporting period. This was suspected to be missed by the Environment Department as it was not transplanted into Condition 3, Table 3, which was largely understood to contain all infrastructure inspection types and frequency.			
AGMC believe the inspection requirement for the Waroonga Sprayfield should be moved from the operational design requirements of Condition 1, Table 1, to Condition 3, Table 3.			

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>AGMC intend to implement the following actions in the upcoming reporting period:</p> <ul style="list-style-type: none"> • Camp Maintenance Department to include the Waroonga Sprayfield into a weekly inspection schedule, completed utilizing the Fastfield inspection software. • Continue to complete regular environmental workplace inspections of the Waroonga Sprayfield, to verify the weekly inspection records and operational requirements of the Waroonga Biomax and Waroonga Sprayfield facilities. • AGMC to seek amendment to Condition 1, Table 1, to remove the weekly inspection requirement to Condition 3, Table 3. This will be included in the next amendment to L4611/1987/11, and will clarify inspection requirements. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> No	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input type="checkbox"/> Reported to DWER in writing	Date:

Department of Water and Environmental Regulation

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:	11/07/2025
Details of non-compliance:			
<p><u>Oily Water Separator Discharge</u> On 11 July 2025, approximately 10,000L of hydrocarbon contaminated water and sediment was discharged to the Waroonga Bioremediation Pad. A licensed controlled waste management contractor was observed discharging the contaminated water and sediment on the bioremediation pad via sucker truck. Condition 2, Table 2 specifies hydrocarbon contaminated soil as the singular material accepted by this containment infrastructure.</p> <p>This non-compliance was not previously communicated with DWER.</p>			
<p><u>New Holland Turkeys Nest Overflow</u> On 23 November 2025 the New Holland Turkeys Nest was observed to be overflowing from the southern cell due to a blockage in the overflow pipeline. Approximately 5,000L of mine dewater, sourced from the New Holland UG, was discharged to the immediate area surrounding the turkeys nest. This area was wholly encapsulated within the New Holland Waste Rock Dump (WRD) footprint. Details of this non-compliance were reported to DWER in an N1 form notification on 24 November 2025, recognized as a non-compliance to the containment infrastructure requirements of Condition 2, Table 2.</p> <p>This non-compliance was previously communicated to DWER, on 24 November 2025.</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>			
<p><u>Oily Water Separator Discharge</u> There was negligible actual environmental impact imposed by this non-compliance, with the entirety of hydrocarbon contaminated water and sediment contained to the bounds of the Waroonga Bioremediation Pad, and the materials were largely sourced from water/sediment runoff from a nearby washdown bay. The Waroonga Bioremediation Pad has since been rehabilitated (14 February 2026) as the containment infrastructure had reached operational capacity. See below for relevant photos of the non-compliance, and associated rehabilitation.</p>			

Section E – Details of non-compliance with licence condition

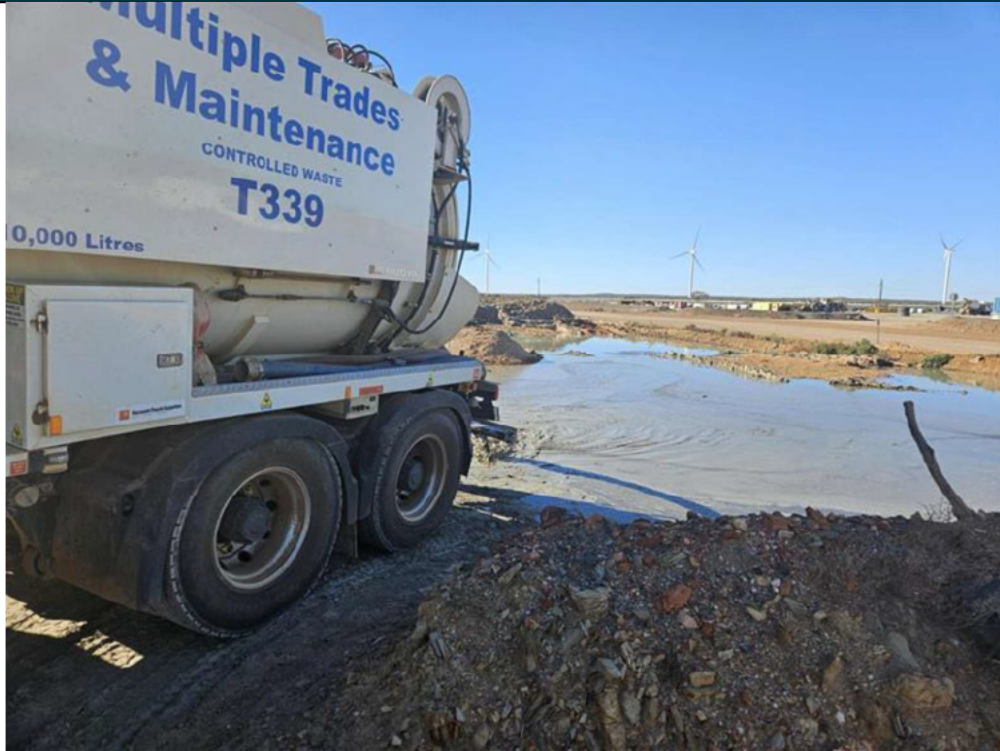


Figure1 – Oily Water Separator discharge to Waroonga Bioremediation Pad.



Figure 2 – Rehabilitated Waroonga Bioremediation Pad

New Holland Turkeys Nest Overflow

There was negligible actual environmental impact imposed by the uncontrolled discharge of mine dewater from the New Holland Turkey Nest. Mine dewater discharge was wholly contained to the disturbed, bunded area located atop of the New Holland WRD. Field sampling of the water TDS indicated fresh to brackish water quality with 3,489 mg/L TDS. The entire discharge footprint was bunded and left to evaporate naturally.

Section E – Details of non-compliance with licence condition



Figure 3 – New Holland Turkeys nest overflow East side.



Figure 4 - New Holland Turkeys nest overflow old sediment sump.

Section E – Details of non-compliance with licence condition



Figure 5 - New Holland Turkeys nest overflow West side.

Cause (or suspected cause) of non-compliance:

Oily Water Separator Discharge

The licensed waste management contractor was directed by site personnel to discharge hydrocarbon contaminated liquid to the Waroonga Bioremediation Pad. This was a result of misunderstanding by site personnel on the intent, and associated licence conditions, relating to this containment infrastructure. The sump muds from the washdown bay have been previously accepted at the Waroonga Bioremediation Pad, however the volume discharged was largely liquid, also discharging hydrocarbon contaminated water. The Environment Department observed discharge in-situ and immediately directed the waste management contractor to cease discharging and coordinated additional removal of material.

New Holland Turkeys Nest Overflow

The overflow mine dewater pipeline, intended to gravity feed mine dewater into the dewatering circuit and maintain the 300mm freeboard, was blocked by windblown vegetation surrounding the New Holland Turkey Nest. The blockage raised the total freeboard above 300mm over nightshift, with the mining shift supervisor noticing the overflow during the daily inspections, as required by Condition 3, Table 3. As this containment infrastructure lacks float sensors and associated alarms, this overflow event was not instantaneously recognized, prior to breaching the 300mm freeboard. This system is established at the Waroonga Turkey Nest.

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

Oily Water Separator Discharge

AGMC proposed/have completed the following mitigation actions

- All hydrocarbon contaminated water was removed from Waroonga Bioremediation Pad.
- Educational waste management presentations completed across all operations, including correct management of bioremediation pads and hydrocarbon contaminated materials.
- Complete rehabilitation of the Waroonga Bioremediation Pads, the location of non-

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
<p>compliance.</p> <p><u>New Holland Turkeys Nest Overflow</u> AGMC proposed/have completed the following mitigation actions</p> <ul style="list-style-type: none"> • Diesel pump bypass was completed to return the 300mm freeboard • Overgrown vegetation removed from New Holland Turkey Nest, and guard installed on gravity fed overflow pipeline • All vegetation removed surrounding embankment of New Holland Turkey Nest • Ongoing dredging of sediment from New Holland Turkey Nest, as per DMPE inspection actions from October 2024. • Installation of permanent power to install float sensors and alarm systems for New Holland Turkey Nest. These alarms will be set at 95% capacity to 300mm freeboard (285mm), to allow time to rectify and isolate mine dewater before non-compliance is triggered. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes (New Holland Turkey Nest Freeboard Breach ONLY), and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 24 / 11 / 2025

Department of Water and Environmental Regulation

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:	01/01/2025 - 31/06/2025
Details of non-compliance:			
<p>The Barren Lands mine dewatering pipeline inspections were not completed as required by Condition 3, Table 3, prior to Q3 2025. These inspections were then completed haphazardly for the remainder of the current reporting period.</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>			
<p>There was no actual environmental impact due to this non-compliance during the current reporting period. The Barren Lands mine dewatering pipeline network consists of a singular corridor, travelling from the Barren Lands open pit to the Barren Lands turkey’s nest. An approximate distance of 150m of pipeline had potential to discharge to the surrounding environment, with the remainder being inside the pit. This pipeline corridor intersected active laydowns and workshop areas, which were consistently in view of the Mining Department and other site personnel.</p> <p>While there was inherent risk of uncontrolled discharge to the environment, the Barren Lands mine dewater quality during the current reporting period was 2,880 – 3,260 mg/L TDS, and actual environmental impact would be minor.</p> <p>No instances of uncontrolled discharge were observed/reported along this mine dewater pipeline network during the current reporting period.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Inadequate change management processes were the primary cause of this non-compliance.</p> <p>Area ownership of the mine dewater pipeline inspections were not adequately communicated by the Environment Department to the mining contractor during project commencement, with the issue raised during acquisition of Barren Lands by AGMC Mining Department (by Environment Department upon review).</p> <p>Inherently, a physical inspection checklist was not generated to capture the intent of Condition 3, Table 3 (visual integrity).</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>AGMC have completed/propose the following mitigation actions to rectify non-compliance:</p> <ul style="list-style-type: none"> • Management of Change process undergoing significant revision, to adequately capture all internal stakeholders during project commencement / handover. • Environment Department created mine dewater pipeline inspection templates, on FastField inspection software. • Inspection ownership communicated to Mining Department, and consultation/guidance provided to complete inspections to the intent of Condition 3, Table 3, and produce auditable records of such inspections. • Ongoing educational presentations / guidance to Mining Department regarding operating licence compliance requirements under L4611/1987/11. 			

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> No	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date: / /

Department of Water and Environmental Regulation

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:	9	Date(s) of non-compliance:	01/01/2025 - 31/12/2025
Details of non-compliance:			
<p>The Lawlers monitoring bores L8 and Satellite Well recorded the following numerical limit exceedances:</p> <ul style="list-style-type: none"> • L8 –Total Dissolved Solids (TDS) field measurement of 3,192 mg/L TDS, exceeding parameter limit of 2,000 mg/L TDS (11 March 2025). • Satellite Well – pH field measurement of 5.96, outside the parameter limits of 6 – 9 (11 March 2025). <p>Condition 9 requires AGMC to record and investigate all numerical limit exceedances under the licence. While these exceedances were recorded appropriately, no further investigation was completed, causing non-compliance with Condition 9.</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>			
There was no actual environmental impact due to this non-compliance.			
Both parameters returned to historical trends in L8 and Satellite Well for the remaining monitoring events during the current reporting period. There was no mining activity ongoing within the Lawlers Mine Area during the reporting period, with decommissioning and care and maintenance activities concluding over 4 years prior.			
Cause (or suspected cause) of non-compliance:			
The suspected cause of non-compliance, noting these exceedances were not investigated at the time, is field probe calibration errors. As both numerical exceedance events appear to be outliers, when compared to 4 years of historical data, it is not considered likely these results reflect an environmental risk to the surrounding aquifers.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>AGMC propose/have undertaken the following mitigation actions:</p> <ul style="list-style-type: none"> • Finalisation of an AER Compliance Tracker, managed by the Environment Department. This compliance tracker will require all environmental monitoring numerical data entry, which will flag non-compliance and produce live trends, through automated graphs and conditional formatting in Microsoft Excel. • Finalisation of a Environmental Monitoring tracker, which will verify completion of field calibrations, chain of custody, receipt of lab results, and update of AER Compliance Tracker. • The AER Compliance Tracker will have accompanying task instruction, in which all Environmental Department personnel must verify understanding of. This task instruction will include secondary reviews of field calibration records, all numerical measurements, and immediate investigation of non-compliance by senior environmental personnel. • Inclusion of environmental monitoring professional development training to the Environment Department, if highlighted as required during Individual Performance Scorecard generation for 2026. 			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No			

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date:

Department of Water and Environmental Regulation

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:	01/01/2025 - 31/12/2025
Details of non-compliance:			
<p>There was a total of thirty-one (31) numerical <u>target</u> exceedances across both the Village WWTP irrigation tank (3) and the Waroonga Sprayfield (28) during the current reporting period.</p> <p><u>Village WWTP irrigation tank</u></p> <ul style="list-style-type: none"> • 2x Total Suspended Solids (TSS) – January & February (30 mg/L target) • 1x <i>Escherichia coli</i> – January (1,000 cfu/100ml target). <p><u>Waroonga Sprayfield</u></p> <ul style="list-style-type: none"> • 2x Biochemical Oxygen Demand (BOD) – May & December (20mg/L target) • 4x TSS – May, June, August, September (30mg/L target) • 1x Total Nitrogen – May (40mg/L) • 10x Total Phosphorus – March – December) (8 mg/L target) • 1x pH – November (6.5 – 8.5 target) • 10x Residual Chlorine – February, April – July, September, December (0.2 – 2.0mg/L target) <p>These numerical target exceedances are further demonstrated in the AER, with tabulated data provided in Appendix 2 & 3.</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 was no actual environmental impact as a result of this non-compliance. The Village WWTP and Waroonga Sprayfield were both maintained to their operational requirements of Condition 1, Table 1, with regular inspections noting no uncontrolled discharge to the surrounding environment. All irrigation sprayfield facilities were regularly maintained to prevent surface water runoff or pooling.</p>			
Cause (or suspected cause) of non-compliance:			
<p>This non-compliance is a continued result of the Waroonga Biomax WWTP facility not being designed or installed to adequately treat the operationally required throughput of wastewater effluent, inadequate change management processes and lack of infrastructure ownership.</p> <p>Biomax have continuously been engaged to diagnose and investigate this continued failure to meet the wastewater effluent quality parameters. Following operating licence approval to replace the Waroonga Biomax facility with a Tristar Sequential Reactor WWTP in 2023, AGMC decided to upgrade the Waroonga Biomax facility, as a more cost-effective option, considering the Life of Mine (LoM) of Agnew Operations. Biomax were also engaged to provide adequate training to the Maintenance Department, to swiftly rectify any operational issues. This was inconsistently completed in 2025, and area ownership of the Waroonga Biomax facility transferred from the Mining Maintenance, Camp Maintenance and eventually the Biomax contractors during this time, leading to area ownership confusion and lack of responsibility to maintain equipment.</p> <p>The Village WWTP TSS non-compliance was attributed to clogged filter screens, which were</p>			

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
replaced by Camp Maintenance, and TSS results returning within compliance for the remaining reporting period. The <i>Escherichia coli</i> target exceedance was a moderate outlier to following measurements and is considered attributable to sampler contamination.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>AGMC propose the following mitigation actions:</p> <ul style="list-style-type: none"> • Finalisation of an AER Compliance Tracker, managed by the Environment Department. This compliance tracker will require all environmental monitoring numerical data entry, which will flag non-compliance and produce live trends, through automated graphs and conditional formatting in Microsoft Excel. • Finalisation of an Environmental Monitoring tracker, which will verify completion of field calibrations, chain of custody, receipt of lab results, and update of AER Compliance Tracker. • The AER Compliance Tracker will have accompanying task instruction, in which all Environmental Department personnel must verify understanding of. This task instruction will include secondary reviews of field calibration records, all numerical measurements, and immediate investigation of non-compliance by senior environmental personnel. • Task instruction will also include requirements to report WWTP non-compliance to Camp Maintenance for rationale and rectification. This was largely successful for the Village WWTP. This was not successful for the Waroonga Sprayfield non-compliance, as area ownership was not consistent, and knowledge to diagnose non-compliance was restricted to Biomax contractors, who failed to visit Agnew consistently in 2025. • The Environment Department will consider the significant increase in non-compliance at the Waroonga Sprayfield, in comparison to 2023 & 2024, to investigate timely replacement of the Waroonga Biomax facility to the Tristar Sequential Reactor WWTP. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> No	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 31 /10 /2022

Department of Water and Environmental Regulation

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:	Condition 16	Date(s) of non-compliance:	01/01/2025 - 31/12/2025
Details of non-compliance:			
<p>The following non-compliances to the environmental monitoring frequency and water quality parameter limits were recorded during the current reporting period:</p> <ul style="list-style-type: none"> • Annual WAD Cyanide parameter results were not collected for L17, L18, L34, L52, L53, L8 and Satellite Well. • One six-monthly suite of dissolved metal parameters (Al, Sb, As, B, Ba, Be, Cd, Cr, Co, Cu, Fe, Pb, Mn, Hg, Ni, Mo, Se, Ag, Sn and Zn) were not collected across all Songvang TSF4 monitoring bores (SV1-1, SV2-1, SV2-2, SV4-1, SV5-1, SV6-1). All other Major Ion parameters were collected. • The following Agnew TSF2 monitoring bores were noted as dry, with no quarterly water quality sample collected. <ul style="list-style-type: none"> ○ (EC473 (Q3, Q4) ○ EC475 (Q1, Q2, Q3, Q4) ○ EC476 (Q2, Q4) ○ WC477 (Q4) ○ EWB61 (Q1, Q2, Q3, Q4) ○ EWB62 (Q2) ○ EWB66 (Q4) ○ EWB67 (Q3, Q4) ○ EWB68 (Q3, Q4) • Weekly dissolved arsenic measurements were not taken at Songvang TSF4 decant pond from: <ul style="list-style-type: none"> ○ 22 December 2024 – 3 January 2025 (11 days) ○ 1 March – 9 March (7 Days) ○ 13 May – 27 May (13 Days) ○ 22 June – 07 July (14 Days) ○ 7 December – 15 December (7 Days) • Satellite Well exceeded the numerical pH limit range (6 – 9), with a field measurement of 5.96. • L8 exceeded the numerical TDS limit (2,000mg/L), with a field measurement of 3,192mg/L. <p>Both numerical limit exceedances (L8 and Satellite Well) were recorded in March 2025. All field groundwater quality measurements returned to historic trends, and below respective numerical limits, in all following monitoring events during the current reporting period. No laboratory samples were required under Condition 16, Table 13, and as such, confirmation of suspected cause (field probe calibration error) could not be verified at the time.</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>			
There was no actual or suspected environmental impact resulting from these temporal and limit exceedance non-compliance.			
All monitoring frequency events missed during the reporting period recorded water level or quality measurements within historic trends in the subsequent monitoring event, with exception to the WAD cyanide parameters across L17, L18, L34, L53, L8 and Satellite Well, as this was an annual			

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition
<p>monitoring event and further results will be collected in September 2026.</p> <p>As discussed under Condition 16 in the AER, both numerical limit exceedances at L8 and Satellite Well returned to historic trends in subsequent measurements and are considered due to field probe calibration errors.</p> <p>The Agnew TSF2 bores are consistently dry or contain insufficient water to collect licensed parameter suites. This is expected, as the Agnew TSF2 facility has remained inactive since 2004, and groundwater mounding and/or seepage from the facility is extremely unlikely.</p>
<p>Cause (or suspected cause) of non-compliance:</p> <p>There were several causes for non-compliance with Condition 16. The missed parameter suites at Lawlers and Songvang are attributable to staff turnover and lack of understanding of licence requirements and obligations, by monitoring personnel. There was a failure to collect 1 monitoring bottle for each event, with all other parameters collected.</p> <p>The failure to complete all weekly dissolved arsenic readings at Songvang TSF4 is attributable to low staffing during holiday periods, and loss of access to Songvang TSF4 during inclement weather events. There is also a suspected lack of legal obligation understanding with the Processing Department.</p> <p>The suspected cause for numerical limit exceedances at L8 and Satellite Well is erroneous field probe measurements, due to lack/incorrect calibration during March 2025. All relevant water parameters returned to historic trends in subsequent monitoring events, below numerical limits in Table 13.</p>
<p>Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:</p> <p>AGMC proposes to undertake the following mitigation actions:</p> <ul style="list-style-type: none"> • Finalisation of an AER Compliance Tracker, managed by the Environment Department. This compliance tracker will require all environmental monitoring numerical data entry, which will flag non-compliance and produce live trends, through automated graphs and conditional formatting in Microsoft Excel. • Finalisation of a Environmental Monitoring tracker, which will verify completion of field calibrations, chain of custody, receipt of lab results, and update of AER Compliance Tracker. • The AER Compliance Tracker will have accompanying task instruction, in which all Environmental Department personnel must verify understanding of. This task instruction will include secondary reviews of field calibration records, all numerical measurements, and immediate investigation of non-compliance by senior environmental personnel. • Inclusion of environmental monitoring professional development training to the Environment Department, if highlighted as required during Individual Performance Scorecard generation for 2026. • Further educational presentations with Processing Department, to reiterate all environmental compliance requirements under L4611, with area ownership under Processing Department.
<p>Was this non-compliance previously reported to DWER?</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes, and</p>

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
<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:	01/03/2025 – 31/03/2025
Details of non-compliance:			
<p>AGMC failed to design and implement a Groundwater Recovery Plan for the two numerical limit exceedances (L8 & Satellite Well) under Condition 16, Table 13. Details of said numerical limit exceedances are discussed above.</p> <p>Both numerical limit exceedances were recorded in March 2025. All field groundwater quality measurements returned to historic trends, and below respective numerical limits, in all following monitoring events during the current reporting period. No laboratory samples were required under Condition 16, Table 13, and as such, confirmation of suspected cause (field probe calibration error) could not be verified at the time.</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>			
<p>As these numerical limit exceedances were considered attributable to erroneous field probe calibrations, and both monitoring bores and relevant parameters returned to historic trends (below the limit of Table 13), no actual or suspected environmental impact occurred due to this non-compliance.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The suspected cause of this non-compliance was the lack of adequate secondary review and verification of water quality results. Monitoring personnel with ownership of monitoring data collection and upload to an online database failed to recognize the numerical limit exceedance across both bores in March 2025. This is largely attributable to a lack of understanding regarding Condition 16, Table 13 by monitoring personnel. If this was recognized, additional field measurements would have been collected to verify the cause being field calibration or actual water quality parameter changes.</p> <p>There was also a lack of secondary review and verification of field probe calibration records, which could not be produced by monitoring personnel during this non-compliance event.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>AGMC proposes to undertake the following mitigation actions:</p> <ul style="list-style-type: none"> Finalisation of an AER Compliance Tracker, managed by the Environment Department. This compliance tracker will require all environmental monitoring numerical data entry, which will flag non-compliance and produce live trends, through automated graphs and conditional formatting in Microsoft Excel. Finalisation of a Environmental Monitoring tracker, which will verify completion of field calibrations, chain of custody, receipt of lab results, and update of AER Compliance Tracker. The AER Compliance Tracker will have accompanying task instruction, in which all 			

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
<p>Environmental Department personnel must verify understanding of. This task instruction will include secondary reviews of field calibration records, all numerical measurements, and immediate investigation of non-compliance by senior environmental personnel.</p> <ul style="list-style-type: none"> Inclusion of environmental monitoring professional development training to the Environment Department, if highlighted as required during Individual Performance Scorecard generation for 2026. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> No	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date: / /

Department of Water and Environmental Regulation

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:	01/03/2025 – 31/03/2025
Details of non-compliance:			
<p>AGMC failed to design and implement a Groundwater Recovery Plan within 6 months of becoming aware of numerical water quality exceedance at both L8 and Satellite Well monitoring bores.</p> <p>Both numerical limit exceedances were recorded in March 2025. All field groundwater quality measurements returned to historic trends, and below respective numerical limits, in all following monitoring events during the current reporting period. No laboratory samples were required under Condition 16, Table 13, and as such, confirmation of suspected cause (field probe calibration error) could not be verified at the time.</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>			
<p>As these numerical limit exceedances were considered attributable to erroneous field probe calibrations, and both monitoring bores and relevant parameters returned to historic trends (below the limit of Table 13), no actual or suspected environmental impact occurred due to this non-compliance.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The suspected cause of this non-compliance was the lack of adequate secondary review and verification of water quality results. Monitoring personnel with ownership of monitoring data collection and upload to an online database failed to recognize the numerical limit exceedance across both bores in March 2025. This is largely attributable to a lack of understanding regarding Condition 16, Table 13 by monitoring personnel. If this was recognized, additional field measurements would have been collected to verify the cause being field calibration or actual water quality parameter changes.</p> <p>There was also a lack of secondary review and verification of field probe calibration records, which could not be produced by monitoring personnel during this non-compliance event.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>AGMC proposes to undertake the following mitigation actions:</p> <ul style="list-style-type: none"> • Finalisation of an AER Compliance Tracker, managed by the Environment Department. This compliance tracker will require all environmental monitoring numerical data entry, which will flag non-compliance and produce live trends, through automated graphs and conditional formatting in Microsoft Excel. • Finalisation of a Environmental Monitoring tracker, which will verify completion of field calibrations, chain of custody, receipt of lab results, and update of AER Compliance Tracker. • The AER Compliance Tracker will have accompanying task instruction, in which all Environmental Department personnel must verify understanding of. This task instruction will include secondary reviews of field calibration records, all numerical measurements, and immediate investigation of non-compliance by senior environmental personnel. • Inclusion of environmental monitoring professional development training to the Environment Department, if highlighted as required during Individual Performance 			

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
Scorecard generation for 2026.	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> No	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date: / /

Department of Water and Environmental Regulation

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:	19	Date(s) of non-compliance:	01/03/2025 – 31/03/2025
Details of non-compliance:			
<p>AGMC failed to design and implement a Groundwater Recovery Plan, as required under Condition 17 and Condition 18, and as such, the inclusions required under said plan were not executed during the current reporting period, inclusive of:</p> <ul style="list-style-type: none"> Notification to the CEO in writing of when and in how many bores the limit could not be met. Any significant environmental impacts observed; strategies to achieve the groundwater level and/or groundwater quality limit, including predicted increases in groundwater recovery and any additional recovery bores or trenches required. Predicted timeframes to achieve the groundwater level and/or groundwater quality limit; and Strategies to ensure the limit will be met in the future. <p>Both numerical limit exceedances were recorded in March 2025. All field groundwater quality measurements returned to historic trends, and below respective numerical limits, in all following monitoring events during the current reporting period. No laboratory samples were required under Condition 16, Table 13, and as such, confirmation of suspected cause (field probe calibration error) could not be verified at the time.</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>			
<p>As these numerical limit exceedances were considered attributable to erroneous field probe calibrations, and both monitoring bores and relevant parameters returned to historic trends (below the limit of Table 13), no actual or suspected environmental impact occurred due to this non-compliance.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The suspected cause of this non-compliance was the lack of adequate secondary review and verification of water quality results. Monitoring personnel with ownership of monitoring data collection and upload to an online database failed to recognize the numerical limit exceedance across both bores in March 2025. This is largely attributable to a lack of understanding regarding Condition 16, Table 13 by monitoring personnel. If this was recognized, additional field measurements would have been collected to verify the cause being field calibration or actual water quality parameter changes.</p> <p>There was also a lack of secondary review and verification of field probe calibration records, which could not be produced by monitoring personnel during this non-compliance event.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>AGMC proposes to undertake the following mitigation actions:</p> <ul style="list-style-type: none"> Finalisation of an AER Compliance Tracker, managed by the Environment Department. This compliance tracker will require all environmental monitoring numerical data entry, which will flag non-compliance and produce live trends, through automated graphs and conditional formatting in Microsoft Excel. 			

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
<ul style="list-style-type: none"> Finalisation of a Environmental Monitoring tracker, which will verify completion of field calibrations, chain of custody, receipt of lab results, and update of AER Compliance Tracker. The AER Compliance Tracker will have accompanying task instruction, in which all Environmental Department personnel must verify understanding of. This task instruction will include secondary reviews of field calibration records, all numerical measurements, and immediate investigation of non-compliance by senior environmental personnel. Inclusion of environmental monitoring professional development training to the Environment Department, if highlighted as required during Individual Performance Scorecard generation for 2026. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> No	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date: : / /

Department of Water and Environmental Regulation

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:	01/03/2025 – 31/03/2025
Details of non-compliance:			
<p>AGMC failed to design and implement a Groundwater Recovery Plan, as required under Condition 17 and Condition 18, and as such, this said plan was not submitted to the CEO for review, and was not implemented during the current reporting period.</p> <p>Both numerical limit exceedances were recorded in March 2025. All field groundwater quality measurements returned to historic trends, and below respective numerical limits, in all following monitoring events during the current reporting period. No laboratory samples were required under Condition 16, Table 13, and as such, confirmation of suspected cause (field probe calibration error) could not be verified at the time.</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>			
<p>As these numerical limit exceedances were considered attributable to erroneous field probe calibrations, and both monitoring bores and relevant parameters returned to historic trends (below the limit of Table 13), no actual or suspected environmental impact occurred due to this non-compliance.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The suspected cause of this non-compliance was the lack of adequate secondary review and verification of water quality results. Monitoring personnel with ownership of monitoring data collection and upload to an online database failed to recognize the numerical limit exceedance across both bores in March 2025. This is largely attributable to a lack of understanding regarding Condition 16, Table 13 by monitoring personnel. If this was recognized, additional field measurements would have been collected to verify the cause being field calibration or actual water quality parameter changes.</p> <p>There was also a lack of secondary review and verification of field probe calibration records, which could not be produced by monitoring personnel during this non-compliance event.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>AGMC proposes to undertake the following mitigation actions:</p> <ul style="list-style-type: none"> • Finalisation of an AER Compliance Tracker, managed by the Environment Department. This compliance tracker will require all environmental monitoring numerical data entry, which will flag non-compliance and produce live trends, through automated graphs and conditional formatting in Microsoft Excel. • Finalisation of a Environmental Monitoring tracker, which will verify completion of field calibrations, chain of custody, receipt of lab results, and update of AER Compliance Tracker. • The AER Compliance Tracker will have accompanying task instruction, in which all Environmental Department personnel must verify understanding of. This task instruction will include secondary reviews of field calibration records, all numerical measurements, and immediate investigation of non-compliance by senior environmental personnel. • Inclusion of environmental monitoring professional development training to the Environment Department, if highlighted as required during Individual Performance 			

Department of Water and Environmental Regulation

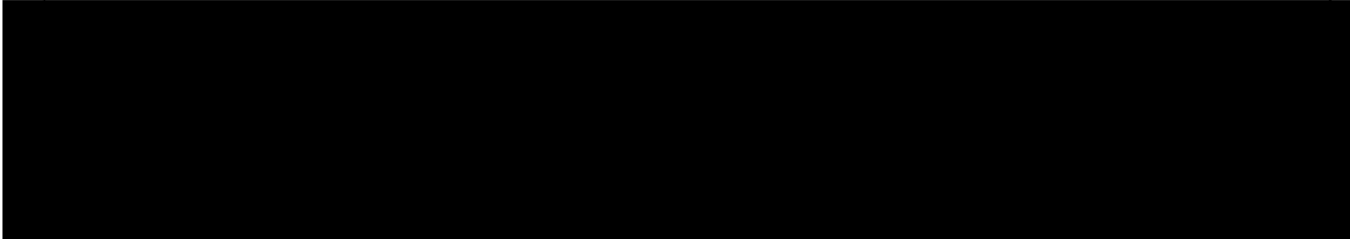
Section E – Details of non-compliance with licence condition	
Scorecard generation for 2026.	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> No	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date: / /

Department of Water and Environmental Regulation

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.



Date:	31/03/2026	Date:	31/03/2026
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.