

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:	L7753/2001/7	Licence file number:	DER2013/000920
Licence holder name:	Process Minerals International Pty Ltd (PMI) (subsidiary of Mineral Resources Ltd – MinRes)		
Trading as:	Process Minerals International Pty Ltd		
ACN:	063 988 894		
Registered business address:	20 Walters Drive, Osborne Park, WA 6017		
Reporting period:	01/07/2023 to 30/06/2024		

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 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
Category 5 - Processing or beneficiation of metallic or non-metallic ore	0 tonnes
Category 64 - Class II putrescible landfill	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
NA	NA

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:	3.2	Date(s) of non-compliance:	29 September 2024
Details of non-compliance:			
Condition 3.2 of L7753/2001/7 requires an Annual Audit Compliance Report (AACR) to be submitted annually by 29 September. The AACR was submitted on 30 September 2024, one day following the due date.			
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.			
Cause (or suspected cause) of non-compliance:			
Due to an administrative error. The due date was misinterpreted with the due date of the DEMIRS Annual Environmental Report for Coobina, 30 September annually.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Due Date has been amended in the internal compliance tracking system.			
Was this non-compliance previously reported to DWER? No			
<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:	1.3.2	Date(s) of non-compliance:	Identified July 2024
Details of non-compliance:			
<p>Condition 1.3.2 of L7753/2001/7 states “<i>The licensee to ensure that all waste is disposed into the landfill or waste rock dump are only subjected to the process(es) set out in Table 1.3.2 and in accordance with process limits described in that Table...</i>”</p> <p>Table 1.3.2 requires that disposal of waste by landfilling shall only take place within the landfill area shown on Landfill area Map in Schedule 1 (L7753/2001/7, Appendix A).</p> <p>During the review of the Coobina Licence for the purposes of renewal, it was discovered that the landfill facility extends outside of the Prescribed Premises boundary and into General Purpose lease G52/285. The extension of the landfill into G52/285 dates back to June 2012, wherein a warning letter was sent to Pilbara Chromite by Department of Mines and Petroleum (DMP, now DEMIRS) regarding an unauthorised extension of the landfill.</p> <p>A Letter of Intent REG ID 35028 titled “<i>Coobina Mine Site Landfill Extension, M52/10 and G52/285</i>” was submitted to DMP dated 07 June 2012. This request mentioned the landfill already extending into G52/285 and requested further extension into the tenement, requiring clearing of an additional 2.4 hectares (ha) of native vegetation; 1.9 ha of this area being within G52/285. A letter of approval was received from DMP for the proposal on 8 October 2012. The Letter of Intent and Approval (ID 35028) have been attached as Appendix B.</p> <p>An inspection of Coobina Project was undertaken by Department of Environment Regulation (DER, now DWER) three years later on 18 June 2015, with the landfill listed as compliant in location, being in a previously cleared area and at the Landfill area depicted in Schedule 1 (as per Condition 1.3.2, L7753/2001/7).</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>Clearing of native vegetation was undertaken to extend the landfill facility. A total area of 2.17 ha has been calculated as disturbed for the purposes of a landfill on G52/285. Figure 1 below highlights the landfill footprint against L7753/2001/7 Premises boundary, with Figure 2 showing the existing trench via current aerial imagery.</p>			

Section E – Details of non-compliance with licence condition



Figure 1: Landfill Footprint and Coobina Project L7753/2001/7 Premises Boundary

Section E – Details of non-compliance with licence condition



Figure 2: Aerial imagery of the landfill trench within G52/285

Cause (or suspected cause) of non-compliance:

Whilst the landfill activity area has been updated and approved within the Coobina Mining Proposal (MP) by DMP; the Prescribed Premises boundary as per L7753/2001/7 was not amended to capture the full disturbance boundary of the landfill facility within G52/285 to coincide with the 2012 MP application.

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

MinRes is currently updating the Mine Closure Plan for the Coobina Project, with the Landfill facility being included within the closure strategy.

The disturbance boundary of the landfill has been updated and reconciled.

MinRes has discussed the potential to update the prescribed premises boundary in the upcoming renewal of L7753/2001/7 with the DWER to incorporate the full activity area of the landfill facility. These communications have been included in Appendix D.

Was this non-compliance previously reported to DWER?

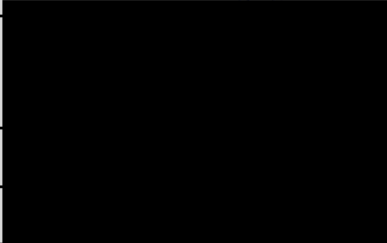
☒ Yes, and

☒ Reported to DWER verbally

Date: 10/6/2024 (meeting record, Appendix D)

☒ Reported to DWER in writing

Date: 11/6/2024 (email, Appendix D)

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:		30 September 2024	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.