



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L8561/2011/1	Licence file number:	INS-0001730
Licence holder:	GMA Garnet Pty Ltd		
Trading as:			
ACN:	009 344 227		
Registered address:	Level 4/108 St Georges Terrace, Perth WA 6000		
Reporting period:	1/08/2024 to 31/07/2025		

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 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
Category 8	455,498 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
Category 8	1,741,915 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:	Condition 2	Date(s) of non-compliance:	Click here to enter text.
Details of non-compliance:			
<p>Condition 2 – Processing Plant – a) “100, 000 L concrete sump “Maintain a minimum 300 mm operational freeboard at all times.”</p> <p>There have been recorded instances where the freeboard has not been maintained resulting in non-compliance with Condition 2(a).</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>It should be noted that under the previously enforced Licence amendment, process water was permitted to drain downgradient from the plant without a requirement to collect water and maintain a 300 mm freeboard. In response to the updated Licence conditions that came into effect on 18 June 2025, GMA is currently in a transitional phase, and improvements to its current management practices are under consideration. Significant water recovery is occurring on-site, and no chemicals are used in the wet plant processes. Based on current recovery and reuse practices, the environmental impact associated with this non-compliance is considered negligible.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The non-compliance with Condition 2(a), specifically the failure to maintain the required 300 mm operational freeboard in the 100,000 L concrete sump, is attributed to a combination of factors. These include capacity constraints within the existing sump, limitations in the current pump infrastructure, and water management practices established under the previous licence conditions.</p> <p>Under the prior licence amendment, process water was permitted to drain downgradient without the requirement for immediate recovery or containment. The existing water recovery system was designed with the intention of collecting and recovering process water in accordance with the revised licence requirements. However, it appears that the system lacks sufficient capacity to manage peak volumes, particularly during periods of high operational demand or heavy rainfall. As a result, intermittent delays in water transfer have occurred, contributing to elevated water levels in the sump and preventing the consistent maintenance of the required 300 mm operational freeboard.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>To address this non-compliance, GMA plans to undertake a capital program to improve the existing water-capturing system and is currently reviewing the pump infrastructure associated with the concrete sump.</p>			
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: / /

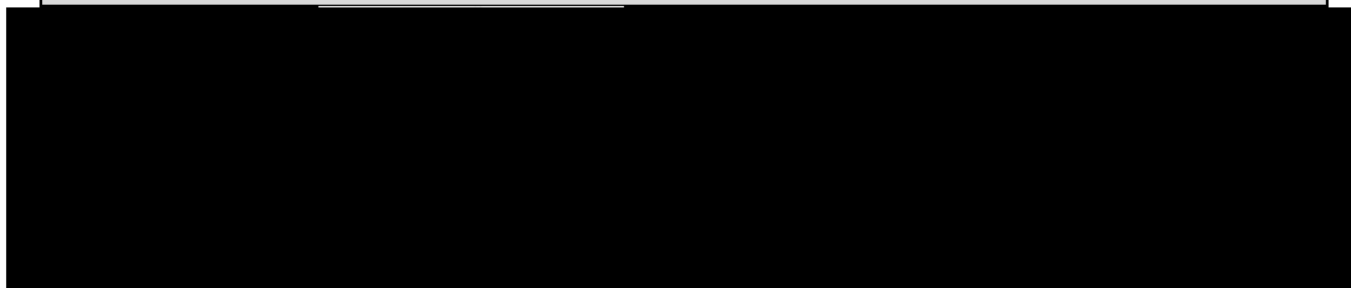
Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 2	Date(s) of non-compliance:	
Details of non-compliance:			
Condition 2 – Solar drying ponds – d)“Water recovery system installed at each pond with collected decant water directed back to process plant for reuse”.			
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.			
As demonstrated in Section 7 of BER, seepage is not contributing to groundwater mounding, with groundwater levels remaining relatively stable over the monitoring period. Importantly, there have been no recorded breaches of the standing water level limit, and no significant changes have been observed in groundwater chemistry. This suggests that current operations are not having an impact on the underlying groundwater conditions.			
Cause (or suspected cause) of non-compliance:			
<p>Due to the nature and behaviour of the slimes, including their settlement characteristics, several challenges have been encountered that have impacted compliance with the requirement for a dedicated water recovery system at each pond.</p> <p>The formation of the beach has resulted in a shallower angle than designed initially, affecting the expected flow and drainage of decant water.</p> <p>The water recovery system requires a minimum operational depth of 0.3 m, which has not consistently been maintained due to the mud's ability to retain water.</p> <p>Significant volumes of water have been lost through solar drying and some via seepage, further reducing available recoverable water.</p> <p>As a result of these limitations, a permanent water recovery system has not been installed at each individual pond.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>To manage the situation, a single mobile turret has been deployed and is operated across multiple ponds on an as-needed basis. This approach, although not fully compliant with clause (d), has been adopted to ensure some level of decant water recovery occurs while addressing operational constraints.</p> <p>GMA will seek an amendment to this condition as part of a Licence amendment.</p>			
Was this non-compliance previously reported to DWER? No			

Department of Water and Environmental Regulation

<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date: / /

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:	30/09/2025	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.

Production Data 2024-2025

	August	September	October	November	December	January	February	March	April	May	June	July	YTD
Hose Ore Total (t)	38588	26446	36491	86649	50713	36651	0	15553	38601	0	0	42008	371,699
Lynton Ore Total (t)	179693	153987	188906	110387	122259	123972	93682	148657	130485	140980	177224	169446	1,739,676
Total Feed (t)	253029	201852	225397	201289	174600	163596	103413	165529	170089	144474	180048	214098	2,197,413
Wet Plant Feed Total (Dry t)	161039	146048	170796	156648	137419	138592	73384	130055	128270	129748	155413	181510	1,708,922
Oversize Total (t)	91990	55804	55939	44260	37182	25004	30029	35474	41819	14726	24634	32588	489,449
SHMC Produced (t)	42836	43452	45403	41190	32904	33644	15472	35617	36196	26177	30596	33968	417,455
FHMC Produced (t)	2351	1546	2937	1120	0	0	0	1429	2103	3709	10746	12102	38,042
Sand Tailings (t)	115853	101050	121118	114718	104514	104948	57912	93009	89971	99862	114071	135440	1,252,466
Mineral	45186	44998	48340	42310	32904	33644	15472	37046	38299	29886	41342	46070	455,498
Waste	207843	156854	177057	158978	141696	129952	87941	128483	131790	114588	138706	168028	1,741,915

Calculated values
 Data input from EOM data