

# **Annual Environmental Report**

## **Licence L8837/2014/2**

**Carina Iron Ore Project – Northern Operations**

**Reporting Period: 1<sup>st</sup> January 2025 to 31<sup>st</sup> December 2025**

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**Company Information**

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**Document Information**

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## Contents

1. Introduction.....	4
2. Site Overview.....	4
3. Environmental Incidents.....	4
4. Water Monitoring.....	5
4.1. Mine Dewatering.....	5
4.2. Freeboard Monitoring.....	5
4.3. Discharge to Groundwater.....	5
4.4. Water Quality.....	5
5. Landfill.....	6
5.1. Waste Acceptance.....	6
6. Compliance.....	6
6.1.1. Standing Water and Water Quality Monitoring.....	6
6.1.2. Dewatering Pipelines.....	7
6.1.3. Annual Audit Compliance Report.....	7
7. Licence Condition Review.....	7
8. Complaints.....	8

## Table of Tables

Table 1-1: Annual Environmental Report Conditions.....	4
Table 4-1: Carina WRD Standing Water m(AHD).....	6
Table 4-2: Ambient Ground Water Quality.....	6

## 1. Introduction

This Annual Environmental Report (AER) has been prepared to satisfy the requirements of the Operating Licence L8837/2014/2, issued by the Department of Water and Environmental Regulation (DWER), to Yilgarn Iron Pty Ltd for the Carina Iron Ore Project.

In accordance with Condition 4.2 of the licence, this report covers the reporting period from 1 January 2025 until the 31 December 2025 and includes:

- An audit of compliance with all applicable Licence conditions during the reporting period;
- Submission of an Annual Audit Compliance Report (AACR), in the approved form; and
- Submission of this Annual Environmental Report addressing the Licence conditions listed in Table 1-1, and providing information specified therein.

*Table 1-1: Annual Environmental Report Conditions*

Licence Condition/Table	Requirement
-	Summary of non-compliances
Table 2.2.1	Dewatering throughputs
Table 3.2.1	Summary of monitoring results
Table 4.1.4	Complaints summary

## 2. Site Overview

The Carina Iron Ore Project comprises of two (2) open pits, associated waste rock dumps (WRDs), run-of-mine pads (ROMs) and supporting infrastructure.

Operating Licence L8837/2014/2 allows for mine dewatering up to 450,000 tonnes per annum and the operation of a putrescible landfill site, accepting up to 518 tonnes per annum. No amendments to the Licence were made during the reporting period.

The Project remained in an operational pause during the reporting period, with no mining or production activities were undertaken. The dewatering infrastructure and landfill were not utilised during the reporting period. While the Project remained in an operational pause, environmental monitoring activities were undertaken on a limited and intermittent basis during the reporting period.

Exploration is being undertaken under separate approvals to inform future mine planning, no timeframe has been established for the recommencement of mining activities.

## 3. Environmental Incidents

There were no environmental incidents, and no failures or malfunctions of pollution control equipment, during the reporting period.

## **4. Water Monitoring**

### **4.1. Mine Dewatering**

During the reporting period no dewatering activities were undertaken due to an operational pause. As a result, flow meters and dewatering pipeline were not monitored.

### **4.2. Freeboard Monitoring**

Freeboard monitoring of containment infrastructure was undertaken via visual inspections throughout the reporting period to verify compliance with the 500mm freeboard requirement, despite no dewatering activities occurring during the reporting period.

### **4.3. Discharge to Groundwater**

Due to no dewatering activities being undertaken during the reporting period, no emissions were discharged to groundwater.

### **4.4. Water Quality**

Standing water monitoring was required to be undertaken on a monthly basis, with water quality sampling required quarterly during the reporting period.

During the reporting period, standing water monitoring was completed for eight months; however, monitoring was not undertaken consistently each month. Water quality sampling was completed on two occasions, rather than the four quarterly sampling events required under the licence. Results for completed sampling are provided in Table 4-1 and Table 4-2.

This shortfall in monitoring occurred during a period of operational pause, business transition and transfer of operational ownership, together with changes to site environmental personnel. During this period, site activities were reduced and routine monitoring programs were temporarily disrupted, which affected the continuity of standing water and water quality monitoring.

No significant standing water persistence or adverse environmental impacts were identified during the monitoring events that were completed. Where standing water was observed, it was assessed in accordance with site procedures.

To address this non-compliance and prevent recurrence, the following actions have been implemented:

- Environmental monitoring responsibilities have been clarified and reassigned.
- Site environmental staffing levels have stabilised and are expected to increase, improving capacity to meet monitoring obligations.
- Monitoring schedules have been reviewed and incorporated into the site environmental calendar, with reminders in place to support timely completion.
- The standing water and water quality monitoring program has recommenced in accordance with licence requirements.

The proponent acknowledges that the monitoring requirements were not fully met during the reporting period and is committed to achieving full compliance going forward.

Table 4-1: Carina WRD Standing Water m(AHD)

Month	WRD1	WRD2	WRD3
January	Dry	415.58	410.84
February	Dry	411.12	410.87
March	Dry	411.10	410.84
June	Dry	411.00	410.92
August	Dry	411.11	410.92
September	Dry	411.04	411.40
December	Dry	4111.11	410.85

Table 4-2: Ambient Ground Water Quality

Parameter	Units	June 2025		December 2025	
		WRD2	WRD3	WRD2	WRD3
pH	pH units	6.8	6.6	6.9	6.7
EC	µS/cm	51000	51000	50000	50000
Aluminium	µg/L	20	20	29	22
Arsenic	µg/L	27	4.5	22	3.2
Bicarbonate	mg/L	750	540	760	550
Cadmium	µg/L	2.8	0.5	1.6	0.62
Carbonate	mg/L	5	5	5	5
Chloride	mg/L	24000	23000	22000	23000
Chromium	µg/L	2	2	2	2
Copper	µg/L	35	2	31	2.3
Iron	µg/L	2.4	2.5	20	20
Magnesium	mg/L	1400	1700	1700	1700
Manganese	µg/L	0.05	0.05	74	200
Mercury	µg/L	15	71	0.05	0.05
Nitrate as NC	mg/L	1.2	3.2	0.58	0.17
Potassium	mg/L	130	150	140	130
Selenium	µg/L	2	2	2.8	2
Silver	µg/L	2	2	2	2
Sodium	mg/L	9000	12000	11000	11000
Sulphate	mg/L	3700	3700	3500	3600
Zinc	µg/L	29	26	19	21

## 5. Landfill

### 5.1. Waste Acceptance

During the reporting period, no waste was disposed of onto the landfill facility.

## 6. Compliance

### 6.1.1. Standing Water and Water Quality Monitoring

Standing water and water quality monitoring were not undertaken in full accordance with licence requirements during the reporting period. Standing water monitoring was completed for eight months and was not conducted consistently on a monthly basis, and water quality sampling was undertaken on two occasions rather than the four quarterly events required.

The non-compliance occurred during a period of operational pause, business transition and changes to site environmental staffing, which disrupted routine monitoring activities.

Site environmental staffing levels have since stabilised and are expected to increase, and monitoring responsibilities and scheduling have been reviewed. The standing water and water quality monitoring program has recommenced in accordance with licence requirements.

#### 6.1.2. Dewatering Pipelines

Daily inspections of the mine dewatering pipeline were not undertaken for the full reporting period in accordance with licence requirements.

The non-compliance occurred during periods when mine dewatering was not operational, including during an operational pause. During these periods, the dewatering pipeline was not in use and was not conveying water.

No leaks, failures or environmental impacts associated with the dewatering pipeline were identified during operational periods, and inspections were undertaken when dewatering activities were occurring.

Environmental risk associated with the dewatering pipeline is considered low during non-operational periods when the pipeline is inactive.

#### 6.1.3. Annual Audit Compliance Report

The Annual Audit Compliance Report for L8837/2014/2 is provided in Appendix A. Non-compliances identified during the reporting period are summarised in Sections 6.1.1 and 6.1.2 of this report.

## **7. Licence Condition Review**

The proponent considers that certain monitoring and reporting requirements do not appropriately reflect the level of environmental risk during periods when the project is in an operational pause.

It is requested that the frequency of standing water level monitoring and ambient water quality sampling be reduced during periods of non-operation, noting that the site is inactive, there are not active disturbance or dewatering activities, and the risk to the surrounding environment is low. Currently, standing water level monitoring is required on a monthly basis and ambient water quality monitoring on a quarterly basis. A reduced monitoring frequency during non-operational periods would better align monitoring effort with environmental risk.

In addition, the proponent considers that the requirement for daily inspection of the mine dewatering pipeline during periods when dewatering is not occurring is not risk-based and does not align with site activities. It is therefore requested that the relevant licence condition be amended or reworded to require daily pipeline inspection only during periods when mine dewatering is operational, rather than when the pipeline is inactive.

Amending these requirements would ensure monitoring and inspection activities are targeted to periods of actual environmental risk, improve the practical implementation of the monitoring program, and maintain appropriate environmental protection outcomes.

## **8. Complaints**

Yilgarn Iron received no complaints in relation to the Carina Iron Ore Project during the 2025 reporting period.

# Appendix A – Annual Audit Compliance Report (AACR)



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

Section A – Licence Details			
Licence number:	L8837/2014/2	Licence file number:	INS-0001762
Licence holder:	Yilgarn Iron Investments		
Trading as:	Yilgarn Iron Pty Ltd		
ACN:	686 388 063		
Registered address:	12 Kings Park Road West Perth WA 6005		
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"><li>• section C;</li><li>• section D if required; and</li><li>• sign the declaration in Section F.</li></ul>
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"><li>• section C;</li><li>• section D if required;</li><li>• section E; and</li><li>• sign the declaration at Section F.</li></ul>

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 6: Mine Dewatering	0.00 tonnes
Category 89 Putrescible landfill site	0.00 tonnes

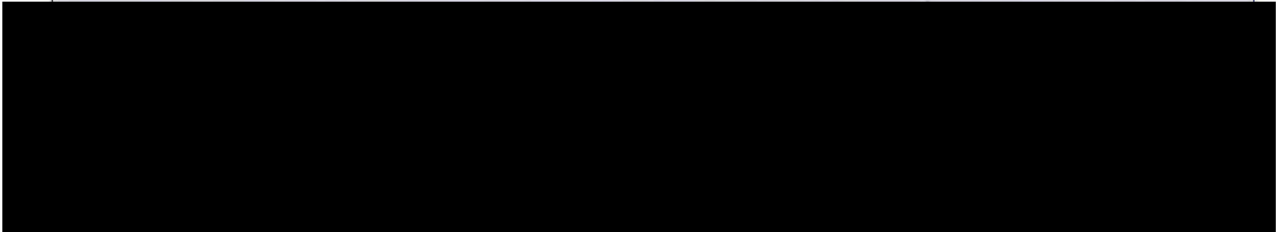
Section D – Statement of Actual Part 2 Waste Discharge Quantity	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity
N/A	N/A

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:	1.1.4	Date(s) of non-compliance:	1/01/2025 to 31/12/2025
Details of non-compliance:			
Daily inspections of the mine dewatering pipeline were not undertaken for the reporting period, resulting in a non-compliance with licence requirements. The non-compliance occurred as the project was in an operational pause for the entirety of the reporting period and no mine dewatering activities were undertaken. The dewatering pipeline was not in use or conveying water, and no leaks, failures, or environmental impacts were identified. Further detail is provided in the Annual Environmental Report.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
Environmental risk associated with the dewatering pipeline is considered low while the pipeline is inactive.			
Cause (or suspected cause) of non-compliance:			
The non-compliance occurred due to the project being in an operational pause for the entirety of the reporting period, during which no mine dewatering activities were undertaken, and the dewatering pipeline was not in use. As a result, daily inspections required under the licence were not conducted.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
No adverse environmental effects were identified as the dewatering pipeline was not in use during the reporting period and no water was conveyed. Environmental risk associated with the inactive pipeline was therefore low. To prevent recurrence, the monitoring requirements applicable during periods of operational pause and care and maintenance have been reviewed, and a request for reduced monitoring requirements has been submitted to the regulator. Monitoring and inspection regimes will be updated in accordance with the regulator's determination.			
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:	3.3.1	Date(s) of non-compliance:	April, May, July, October, November 2025
Details of non-compliance:			
<p>Standing water and water quality monitoring were not undertaken in full accordance with licence requirements during the reporting period, resulting in a non-compliance. The non-compliance occurred during a period of operational pause, business transition and changes to site environmental staffing, which disrupted routine monitoring activities. Site environmental staffing has since stabilised, monitoring responsibilities have been reviewed, and the standing water and water quality monitoring program has recommenced in accordance with licence requirements. Further details is provided in the Annual Environmental Report.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>Environmental risk associated with reduced monitoring of standing water / groundwater quality is considered low while the mine is inactive.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The non-compliance occurred during a period when the project was in an operational pause, combined with business transition and changes to site environmental staffing. These factors disrupted the scheduling and completion of standing water level monitoring and ambient water quality sampling in accordance with licence requirements.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>No adverse environmental effects were identified, as the mine was inactive and no dewatering or groundwater abstraction occurred during the reporting period. Environmental risk associated with reduced monitoring was therefore considered low. Site environmental staffing has since stabilised, monitoring responsibilities and schedules have been reviewed, and the standing water level and ambient water quality monitoring program has recommenced in accordance with licence requirements. In addition, a request for reduced monitoring requirements during periods of operational pause has been submitted to the regulator. Monitoring programs will be updated in accordance with the regulator’s determination.</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 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<sup>1</sup>. I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.



Date:	21/1/26	Date:	
Seal (if signing under seal):			

<sup>1</sup> 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.

<sup>2</sup> 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.