

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:	L8845/2014/1	Licence file number:	2014/002065
Licence holder name:	IB Operations Pty Ltd		
Trading as:	IB Operations Pty Ltd		
ACN:	165 513 557		
Registered business address:	Level 2 Hyatt Centre 87 Adelaide Terrace EAST PERTH WA 6004		
Reporting period:	01/01/2019 to 31/12/2019		

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	9 t
52 – Electric power generation	3.3 MWe
54 – Sewage facility	N/A

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
5 – Processing or beneficiation of metallic or non-metallic ore	52 t
52 – Electric power generation	N/A
54 – Sewage facility	7.74 m ³ /day whilst operating

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:	1.2.3	Date(s) of non-compliance:	2019
Details of non-compliance:			
Tailings inspections were not routinely completed fortnightly whilst in Care and Maintenance as required by the condition.			
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 – the tailings pipeline was not in use.			
Cause (or suspected cause) of non-compliance:			
Limited on-site resources to undertake monitoring.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monitoring checklist prepared. Site resourcing increased. Note that this TSF is not required for Stage 2 and is within the construction envelope for Stage 2.			
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:	1.3.4	Date(s) of non-compliance:	2019
Details of non-compliance:			
The condition requires that treated wastewater is evenly distributed over the irrigation area. The sprinklers were not adequately maintained and distribution was uneven.			
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.			
Impact limited to wet patches at the base of some sprinklers.			
Cause (or suspected cause) of non-compliance:			
Failure of sprinklers to operate according to specifications.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Effluent diverted to licenced waste contractor (Cleanaway). Sprinkler system is being upgraded and the irrigation area be expanded to allow for increased personnel numbers.			
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:	1.3.5	Date(s) of non-compliance:	1/12/2019 17/12/2019
Details of non-compliance:			
<p>On 1 December 2019 the float pump failed (INC-75996). Because of this failure, the trigger alarm on the level sensor did not activate causing the balance tank to overflow and discharge approximately 15 kL of effluent waste water to ground. The bund wall had been compromised due to earthworks in the area resulting in the spill exiting the bunded area.</p> <p>On the 17 December 2019 (INC-76318), the level sensor on the aeration tank failed causing the one of the balance tanks to overflow, discharging approximately 3 kL of effluent wastewater to the ground.</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>INC-75996 - Waste water flowed downhill from the tank and infiltrated into the soil nearby. No apparent impact.</p> <p>INC-76318 – No impact. Spill did not leave bunded area.</p>			
Cause (or suspected cause) of non-compliance:			
<p>INC-75996 – Float pumps did not work failing to trigger alarm on level sensor.</p> <p>INC-76318 - Failure of high level alarm.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>INC-75996 - Isolated the plant and stopped the out flow of liquid onto the ground. Emergency windrow installed to prevent spill entering into native vegetation and the adjacent creek line.</p> <p>INC-76318 - High level alarm replaced. Waste water contractor removing waste water.</p> <p>WWTP being renovated and upgraded to match requirements of planned camp numbers to support Stage 2 construction.</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:	3.2.1	Date(s) of non-compliance:	2019
Details of non-compliance:			
Monitoring was not undertaken for four required months (July, August, September, October and November) of the 2019 reporting period while WWTP was in operation and treated water from WWTP was discharged to irrigation area.			
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 detected impact as most effluent has been transported off-site. A limited number of sprinklers were operational in the sprayfield.			
Cause (or suspected cause) of non-compliance:			
Lack of site resources and awareness of monitoring requirement.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monitoring checklist. Water compliance person employed by the Water Services Department who are managing the 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:	3.3.1	Date(s) of non-compliance:	2019
Details of non-compliance:			
Water quality sample not taken for surface water at NS_ST_SW_002. It appears to have overflowed during a rainfall event in March 2019.			
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 impact likely as drainage area is small. None of the licenced sediment ponds will be retained for Stage 2 which has now commenced.			
Cause (or suspected cause) of non-compliance:			
Automatic sediment sampler not in place. Lack of site resources.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monitoring register. An Environment team of three people is now on site.			
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: / /	

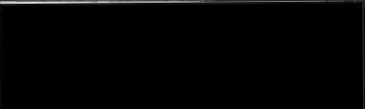

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.3.1	Date(s) of non-compliance:	February – April 2019
Details of non-compliance:			
Monthly groundwater standing level and pH not monitored.			
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.			
Nil.			
Cause (or suspected cause) of non-compliance:			
Lack of site resources.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monitoring register. An Environment team of three people is now on site.			
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 license holder was non-compliant at a time during the reporting period.			
Condition no:	4.3.1	Date(s) of non-compliance:	May 2019
Details of non-compliance:			
Failure to notify DWER 60 days prior to recommencing production. The WWTP for the Japal Village was in care and maintenance until May 2019. Notification to DWER of resumption of operation was not provided until 6 September 2019. The resumption of operation of the WWTP was in response to an increase in numbers of site personnel, not recommencing normal mining and processing operations.			
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.			
Nil.			
Cause (or suspected cause) of non-compliance:			
Inadequate communication and management of licence obligations resulted in an oversight regarding the requirement to notify DWER prior to recommencement of irrigation.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Appointment and commencement of site-based environment resources as well as reassignment of Licence obligations to accountable employees was completed in December and January. In addition, a Project Compliance Manager was appointed for commencement in January 2020.			
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 particular¹.

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:	Technical Director	Position:	
Date:	31 st MARCH 2020	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.