



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L9012/2016/1	Licence file number:	DER2016/002205
Licence holder:	Linden Gold Pty Ltd		
Trading as:			
ACN:	138 222 705		
Registered address:	Level 2, 8 Colin St, West Perth WA 6000		
Reporting period:	1 / July / 2021 to 30 / June / 2022		
	Note: The Licence was amended on 19 May 2022, unless otherwise specified this AACR reflects compliance with the amended version of the Licence.		

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 5: Processing or beneficiation of metallic or non-metallic ore	0
Category 6: Mine dewatering	438,127 m ³

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			
Condition no:	Assessed production/ design capacity	Date(s) of non-compliance:	30/06/2022
Details of non-compliance:			
<p>The assessed production/ design capacity for Category 6: Mine Dewatering is 420,000 tonnes per annual period. During the 2021/22 reporting period a total of 438,127 tonnes of mine dewater was discharged into the evaporation ponds. This is an exceedance of 18,127 tonnes for the annual 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>Nil – no environmental impacts have been observed.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Higher than anticipated rate of dewatering. The estimated throughput was based on a dewatering rate of 13 L/s plus a 2.5% contingency. Whereby 13 L/s was the average rate of dewatering between March 2021 and August 2021.</p> <p>However, since January 2022, the average rate of dewatering has been around 15.6 L/s.</p> <p>The exact reason for this increase is unknown, although it may be attributed to excavations into upper historical areas for production (e.g. stoping of the 1330 Level) where water inflow was observed to be more than usual.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Dewatering is required to ensure safe working environment, therefore, the only way to prevent recurrence of the non-compliance would be to increase the assessed production/ design capacity of the Licence.</p>			
Was this non-compliance previously reported to DWER?			
<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			
Condition no:	4(c)	Date(s) of non-compliance:	30/06/2022
Details of non-compliance:			
<p>Condition 4(c) requires the licence holder to “maintain a written log of all inspections undertaken with each inspection record signed by a responsible person”.</p> <p>A log of inspections is currently maintained within an excel spreadsheet but each inspection record is not signed by a responsible person.</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>Nil – no environmental impacts have been observed</p>			
Cause (or suspected cause) of non-compliance:			
<p>Whilst a formal inspection process has been implemented, the requirement to have the inspection record signed by a responsible person was overlooked.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Going forward, the inspection log will be reviewed by a ‘responsible person’ on a monthly basis. An electronic record of the review will be maintained within the inspection log on a separate tab, and ‘signed’ by a responsible person.</p> <p>In addition, the inspection log will be updated to include the ‘scope of inspection’ as outlined in Table 2 of the Licence, to ensure the inspections are undertaken in accordance with the Licence.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date / /	

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Section E – Details of Non-Compliance with Licence Condition			
Condition no:	7(a)	Date(s) of non-compliance:	30/06/2022
Details of non-compliance:			
<p>Condition 7(4) requires the licence holder to ensure that “quarterly monitoring is undertaken at least 45 days apart”.</p> <p>During the reporting period, the days apart for the quarterly SWL monitoring were as follows: Q4 to Q1: 98 days Q1 to Q2: 19 days Q2 to Q3: 83 days Q3 to Q4: NA – SWL monitoring not completed.</p> <p>The days apart between Q1 and Q2 was less than 45 days.</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>Nil – no environmental impacts have been observed.</p>			
Cause (or suspected cause) of non-compliance:			
There is no set routine for groundwater monitoring.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Implement a routine groundwater monitoring programme.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date / /	

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Section E – Details of Non-Compliance with Licence Condition			
Condition no:	11	Date(s) of non-compliance:	30/06/2022
Details of non-compliance:			
<p>Condition 11 (Table 5) requires the licence holder to undertake SWL monitoring quarterly.</p> <p>During the reporting period, SWL monitoring was not undertaken in Q4.</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>Nil – no environmental impacts have been observed.</p>			
Cause (or suspected cause) of non-compliance:			
<p>There is no set routine for groundwater monitoring.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Implement a routine groundwater monitoring programme.</p>			
Was this non-compliance previously reported to DWER?			
<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			
Condition no:	10 of previous Licence version	Date(s) of non-compliance:	29/09/2021
Details of non-compliance:			
<p>Condition 10 of the previous Licence version (prior to the amendment) stipulated a limit to the SWL measured in GW1, GW2, GW3, and GW4 of >4 mbgl.</p> <ul style="list-style-type: none"> On 29 September 2021 a measured value of 3.68 mbgl was recorded in GW3. This was reported to the DWER on 30 September 2022. On 18 October 2021 a measured value of 3.42 mbgl and 3.65 mbgl were recorded in GW3 and GW4 respectively. This was reported to the DWER on 27 September 2022 following a review of the data on 26 September 2022 when the limit breach was identified. On 09 January 2022 a measured value of 3.35 mbgl and 3.30 mbgl were recorded in GW3 and GW4 respectively. This was reported to the DWER on 27 September 2022 following a review of the data on 26 September 2022 when the limit breach was identified. 			
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>Nil – no environmental impacts have been observed. The area surrounding the evaporation ponds is denude of vegetation.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Seepage from the evaporation pond.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The Licence was amended on 19 May 2022, implementing a 25 m halo around the evaporation ponds to act as an operational footprint of the evaporation ponds. As such, the standing water level limit no longer applies to GW3.</p> <p>Modifications to the dewatering operations are currently underway, which will enable water to be pumped from the evaporation ponds to an existing lined storage dam where it will be subsequently used for dust suppression and underground mining purposes.</p> <p>This will reduce the amount of water stored within the evaporation ponds which will reduce head pressure and mitigate the rate of seepage.</p> <p>In addition, heading into summer, the rate of evaporation is expected to increase which will mitigate the rate of seepage and the amount of water used for dust suppression will also increase which will further reduce the amount of water stored within the evaporation ponds.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 30 / 09 / 2021 27 / 09 / 2022	

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:	11 (Condition 10 of previous Licence version)	Date(s) of non-compliance:	30/06/2022
Details of non-compliance:			
Condition 11 requires ambient environmental quality monitoring from monitoring bores GW1, GW2, GW3 and GW4 to be undertaken quarterly. During the reporting period, monitoring was not undertaken in Quarter 1 (Jul-Aug 2021).			
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>			
Nil			
Cause (or suspected cause) of non-compliance:			
There is no set routine for groundwater monitoring.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Implement a routine groundwater monitoring programme.			
Was this non-compliance previously reported to DWER?			
<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:	12	Date(s) of non-compliance:	30/06/2022
Details of non-compliance:			
<p>Condition 12 of the amended Licence requires monitoring of surface water quality to include the following parameters for metals and metalloids: Mg, Na, K, Al, As, Ca, Cd, Cr, Co, Cu, g, Pb, Mn, Ni, Se, Tl and Zn.</p> <p>During the reporting period, analysis for Mg, Na, K, Al, and Ca was not completed for sampling undertaken in June 2022.</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>			
Nil			
Cause (or suspected cause) of non-compliance:			
The amended Licence listed additional parameters (i.e. Mg, Na, K, Al, and Ca) in Table 6 for monitoring of surface water which were not listed in the previous Licence version. The addition of these parameters were not highlighted by the DWER as a change in the DRAFT Licence and therefore were not noticed until completion of this AACR.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Liaise with the DWER to amend the licence to correct this administrative error (i.e., remove the additional parameters from Table 6).</p> <p>Additionally, the licence should be amended to correct another administrative error, to update chemical symbol for “mercury” in the list of parameters in Tables 5 and 6 to “Hg” (currently listed as “g”).</p>			
Was this non-compliance previously reported to DWER?			
<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:	General Manager Operations (Acting)	Position:	
Date:	28/09/2022	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.