Government of **Western Australia**
Department of **Water and Environmental Regulation**

# Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

| **Section A – Licence Details** | | | |
|---|---|---|---|
| Licence number: | L9046/2017/1 | Licence file number: | DER2016/002506 |
| Licence holder: | ENMIC PTY LTD | | |
| Trading as: | | | |
| ACN: | 066 882 291 | | |
| Registered address: | PO BOX 1544 OSBORNE PARK WA, 6916 | | |
| Reporting period: | 1 / 06 /2024 **to** 31 / 05 /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) |
| X Yes – please complete:<br>• section C;<br>• section D if required; and<br>• sign the declaration in Section F. |
| ☐No – please complete:<br>• section C;<br>• section D if required;<br>• section E; and<br>• 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** |
| 12 | A small amount of screening was completed in 2024 – 2025. To end of May 2025 13,667 tonnes of limesand was screened. |

| **Section D – Statement of Actual Part 2 Waste Discharge Quantity** | |
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| 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: | | Date(s) of non-compliance: | |
| Details of non-compliance: | | | |
| No specific non compliances. The site was inspected by DWER on 1 April 2025 because of complaints being received with respect to dust. dust.<br>DWER found that the fixed sprinkler system was only partially operative and responded by way of email on 16 April 2025. | | | |
| What was the actual (or suspected) environmental impact of the non-compliance?<br><br>**NOTE** – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place. | | | |
| Officers from DEMIRS inspected the site and found that the dust management measures were *"in general were observed to be effective in controlling dust."* DEMIRS Reference AI-568-5542. | | | |
| Cause (or suspected cause) of non-compliance: | | | |
| It remains unclear who lodged the complains as that information was not provided to Enmic Pty Ltd.<br>Dust management was discussed with DEMIRS and DWER and additional actions are to be provided. As noted in previous correspondence to DWER following the site inspection. | | | |
| Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: | | | |
| Additional actions will be taken such as updating the sprinkler system, provision of additional dust spray, and sealing of a larger portion of the access road. Enmic owns a road sweeper and water cart to use as reqired. | | | |
| Was this non-compliance previously reported to DWER? | | | |
| X☐ Yes, and | | | |
| X☐ Reported to DWER verbally | | Date: 1 / 04 / 2025 (DWER Site Inspection) | |
| ☐ 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[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]: | [redacted] | | |
| Name: (printed) | | | |
| Position: | | | |
| Date: | 30 June 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.

| | Condition | Discussion | Management and Future Actions |
|---|---|---|---|
| 1 – Table 2 | General Emissions Summary The emissions listed in Table 2 are "excluded from General Emissions" and relate to water, waste, dust. | The are no water releases, washing or other such activities. The only liquids on site are fuels and lubricants. All major servicing is conducted offsite.<br>A Licenced bore is available on site as a water source.<br>Wastes are recycled or removed regularly from site. | No additional water management actions are required.<br>The bore is licenced and approval for the storage of fuel is provided in the 2023 Mining Proposal.<br>A small water storage tank is in place for the site office. |
| 2 – Table 3 | Fixed irrigation system required when earthmoving screening, loading, operated when visible dust is being generated proactively over a 24 hour period. | Limesand does not generate dust. The limesand itself can blow but that is a natural part of the normal movement of the sand from the coast in mobile dunes. There is no crushing. The only separation of materials by screening is the removal of sticks and vegetation after land clearing if required.<br>Water sprinklers cannot be used on the screening plant because they clog the plant which does not generate any dust apart from the normal movement of limesand particles by saltation.<br><br>A sprinkler system is installed along the access road to minimise the dragging of limesand and dust from the sheeted access road.<br>The main risk is from rain events dragging limesand onto Caves Road.<br><br>Fixed sprinklers have been in place for most of the operations of the pit and are required in DWER L9046/12017/1. They are used as required as there is a balance between wetting the roads as opposed to making them so wet that limesand sticks to the truck wheels. Enmic has discussed this with DEMIRS, Main Roads and the Shire of Augusta – Margaret River.<br>When there is an issue of limesand being dragged onto Caves Road and the sprinklers are not performing satisfactorily, water is used to spray and clean the surface of Caves Road to remove the sand as required, even daily. This will be updated by extending the seal to the egress road, and an on site sweeper is provided on site and will be used as required to pick up dust from the sealed roads.<br><br>See comments from DWER email of 16 April 2025 below. | DEMIRS noted that "*In general these measures were observed to be effective in controlling dust*".<br><br>Even so all dust management practices are in place and operational.<br><br>The egress road is to be sealed when the weather is drier and the road can practicably be installed. |
| | Dust suppressants applied proactively. | Dust suppressants other than water are not used as they might interfere with the free flow of limesand during loading and spreading.<br>Water is used to wet down the portion of the egress and the road by the fixed sprinkler system. It is used during times of potential dust generation. | Dustex is used to stabilise unsealed portions of the access road and hardstand. It is re-applied as required. |
| | Processing plant located below natural ground | The processing plant is located on the floor of the pit well below the natural screening provided by the walls of the pit. | The processing plant is always on the floor of the pit. |

| | Condition | Discussion | Management and Future Actions |
|---|---|---|---|
| | level. | | |
| | Excavator located below natural ground level. | The excavator operates at the base of the pit and on benches and at higher elevation as required for loading trucks and other resource management. As no screening is normally required, the normal operations of the excavator would not fall under the licence. | Where possible all mobile plant operates on the pit floor or as low and elevation as possible, and is protected by the walls of the pit.<br>The number and type of mobile plant changes in response to the sales requirements. On busy days two loaders are commonly used to supply the number of trucks to be loaded.<br>Similarly the type of mobile plant can change. On occasions two bulldozers might be present and a spare loader in cease of mechanical breakdowns. The loaders operate on the floor of the pit, but the excavators and bulldozers are required to operate at a higher elevation but still protected by the natural landform. |
| | Stockpiles located below natural ground level. | There are normally no stockpiles as the sand is not screened unless vegetation and topsoil is being cleared and has contaminated the limesand.<br>The only stockpile is small when the screening plant is used it is located on the floor of the pit. | Stockpiles if required are small and are located on the pit floor. |
| | Signage visible and includes the site manager's phone contact number | The sign is maintained at the entrance from Caves Road and includes the contact phone numbers. | Signage is maintained |
| 3- Table 4 | Complaints recording | A complaints record book is maintained.<br>There were reportedly multiple complaints regarding screening and processing provided to DEMIRS and DWER during early 2025. The location of the complainant was not disclosed to Enmic Pty Ltd<br>The complaints appeared to relate to the DWER Licence and to the potential for dust origin.<br>The number of complaints resulted in officers from DWER and DEMIRS inspecting the site on 1 April 2025.<br><br>Officers from DEMIRS completed a review of the dust management on site and that is recorded in their report of 21 May 2025 which is attached. (DEMIRS Reference AI-568-5542.<br>DEMIRS found that the following activities were being used to minimise and control dust:<br>• Application of Dustex.<br>• Irrigation along the access road.<br>• Providing a street sweeper to manage dust on Caves Road.<br>• Providing a watercart for dust suppression on internal roads.<br>DEMIRS noted that "*In general these measures were observed to be effective in controlling dust*". | Enmic confirmed to DWER that the sprinkler system was updated and operational and sent photos in evidence as requested by 31st May (Also sent to DWER). DWER did note that the use of Dustex meant that the use of the irrigation system was not a *"critical duct control"*. |

| | Condition | Discussion | Management and Future Actions |
|---|---|---|---|
| | | Additional planned dust management were:<br>• Ongoing use of Dustex.<br>• Modifications to the access road including extending the sea and producing undulations to shake dust off vehicles. | |
| 4 | Record keeping | Accurate record keeping is maintained by Enmic Pty Ltd and is available to DWER for review if required. | Enmic provides record keeping. |
| 5 | Complaints recording | See 3-Table 4 above. | The complaints have been recorded. It appears that not all complaints have been provided to Enmic by DWER and other authorities. The complainant was not identified so it is not possible for Enmic to understand the form of complaints or take specific targeted action to address any inadequacy.<br><br>General dust management actions have been applied. |
| 6 | Submission of annual report | This report is appended to the AACR Report. | See attached. |
| 7 | Compliance to request | All requests required by DEMIRS and DWER have been received, responded to and actioned. | |

## Comments from DWER 16 April 2025

**Condition 1 reads:**
*The Licence Holder must ensure that the infrastructure and equipment specified in Column 1 of Table 3 is maintained in good working order and operated in accordance with the requirements specified in Column 2 of Table 3.*

**Table 3 Column 1 and 2 reads: Fixed Irrigation System** *Available at all times when earthmoving, screening or loading activities are being conducted. Operated when visible dust is generated from external ground surfaces on the Premises. Operated proactively subject to weather forecasting over a 24 hour period.*

**Table 5 Row 4 reads: Fixed Irrigation system:** When processing plant is operating, sprinklers will be in placed in fixed locations throughout the quarry that will wet down access roads, egress roads, loading areas and stockpiles.

Findings that contravene above conditions:

***Inspectors found that fixed irrigation systems were not in use whilst on site. There were contractors on site replacing damage parts to the system. However, the irrigation systems were only installed around the entrance and exit tracks of the site. There are no fixed irrigation systems installed that are close to where earthmoving was being conducted. The closest irrigation point was approximately 100 metres away from the earthmoving / loading area of the sand. Management acknowledged that they do not use the fixed irrigation system as the system location is too far away from operations and it would cause more environmental damage through pooling of water / sludge being dragged through site an on to main roads.***

**Requested actions regarding non-compliances**