



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Once completed, please submit this form either via email to info-der@dwer.wa.gov.au, or to the below postal address:

Department of Water and Environmental Regulation
Locked Bag 33 Cloisters Square
PERTH WA 6850

Section A – Licence Details			
Licence number:	L9013/2016/1	Licence file number:	DER2016/002214
Licence holder:	[REDACTED]		
Trading as:			
ACN:			
Registered address:			
Reporting period:	01/11/2020 to 31/10/2021		

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 of metallic ore	2,671,000 tonnes
Category 85 – Sewage facility	42.7 kL daily inflow (based on 250 L per person per day * 68,182 total man-days)
Category 89 – Putrescible landfill	280 T (based on 4.5 kgs per person per day * 68,182 total man-days)

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		
Tailings Deposition	2,671,000 dry tonnes		
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:	L9013/2016/1 Condition 11	Date(s) of non-compliance:	2020-21 reporting period
Details of non-compliance:			
No groundwater sample collection was possible at TSF monitoring bore IMB05 during the reporting period. This monitoring bore is located within the Gilbeys open pit dewatering cone of depression and was dry since its installation to 20 mbgl.			
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.			
The Project does not believe any environmental impacts resulted from the non-compliance. Routine groundwater samples were collected from the remaining TSF monitoring bores (IMB06 to IMB11) throughout the reporting period.			
Cause (or suspected cause) of non-compliance:			
Groundwater levels on the southern side of the TSF have remained deeper than 20 mbgl, with bore IMB05 constructed to 20 m depth being dry across the reporting period, or had only captured minor seepage, such that it was unable to produce enough groundwater volume to be sampled effectively. The lower water levels are attributed to the close proximity of the now dewatered pit			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
On-going quarterly monitoring of TSF monitoring bores and deeper Gilbey's production bores will be continued through-out the reporting period. Groundwater samples will continue to be collected as per <i>Australian Standard AS/NZS5667.11</i> requirements with water samples analysed at NATA accredited laboratory.			
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: Via the 2020-21 AACR and in the Project's Groundwater Monitoring Summary 2020 for GWL183561.	

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:	L9013/2016/1 Condition 12	Date(s) of non-compliance:	2020-21 reporting period
Details of non-compliance:			
Decant water monitoring identified exceedances of the Weak Acid Dissociable Cyanide (WAD CN) limit (50 mg/L) for most months during the reporting period ranging between 33 and 180 mg/L.			
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.			
Weak acid dissociable cyanide (WAD-CN) comprises free cyanide, cyanide salts and metal complexes that dissolve in weak acid solutions (pH range from 4.5 to 6). At neutral pH range within the TSF, metal-cyanide complexes can dissociate sufficiently to be harmful. Fauna (e.g. birds) may drink water containing WAD-CN that is not immediately fatal but breaks down in acidic conditions within the stomach and produce sufficiently high cyanide concentrations to be toxic.			
Cause (or suspected cause) of non-compliance:			
Increases in WAD-CN are expected when ore with higher concentrations of metal sulphides are processed. Metal sulphides are typically associated with higher gold grades at [REDACTED] and require significantly more oxygen and cyanide to liberate the gold. The result of this higher cyanide dosing which is required to effectively leach the gold is higher WAD-CN.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Sodium cyanide input was optimised, a trial in bacterial destruction of cyanide occurred and was unsuccessful, bird deterrents are installed at the tailings storage facilities. The Project sought and obtained an amendment to the Prescribed Licence removing the WAD-CN limit.			
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: Via formal correspondence to info@dwer.wa.gov.au	

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:	L9013/2016/1 Condition 13	Date(s) of non-compliance:	2020-21 reporting period
Details of non-compliance:			
Standing water levels at IMB06 to IMB09 exceeded the licence trigger value of <4 mbgl for monitoring points about the Gilbeys tailings storage facility.			
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 – The Department of Water and Environmental Regulation (the Department) issued an amendment to the Prescribed Premises Licence L9013/2016/1 (the Licence) on 18 August 2020. Amendment of the standing water trigger and limit levels were an administrative error. Gascoyne has entered into dialog with the Department on the appropriateness of the trigger and limit levels within the licence and also reported exceedances to the Department in accordance with the Licence conditions.			
Cause (or suspected cause) of non-compliance:			
Historic groundwater levels about the Gilbey's TSF were above the nominated licence trigger of <7 mbgl.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The Department initiated an amendment of the Licence updating the trigger value and limit for standing water level in groundwater monitoring bores (IMB05 to IMB11). An amended Licence amendment was issued to Gascoyne on 4 May 2021. It specifies the standing water level trigger as 3.5 mbgl and the limit as <2.5 mbgl for monitoring points about the Gilbeys tailings storage facility. Since the licence amended no exceedances of the trigger value and limit were recorded.			
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: Via formal correspondence to info@dwer.wa.gov.au and quarterly standing water level reports to the Department	

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' (DWER) website.

Signature ² :	[Redacted]	Signature:	[Redacted]
Name: (printed)	[Redacted]	Name: (printed)	[Redacted]
Position:	[Redacted]	Position:	[Redacted]
Date:	15/12/21	Date:	15/12/12
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.