

## 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](mailto: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:	L9037/2017/1	Licence file number:	DER2017/000308
Licence holder name:	Process Minerals International Pty Ltd		
Trading as:	Process Minerals International Pty Ltd		
ACN:	063 988 984		
Registered business address:	1 Sleat Road Applecross, WA 6153		
Reporting period:	1/01/2020 to 31/12/2020		

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 in Section F.</li></ul>

<b>Section C – Statement of actual production</b>	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
<b>Prescribed premises category</b>	<b>Actual production quantity</b>
Category 5: Processing or beneficiation of metallic and non-metallic ore	2,312,300 tonnes
Category 57: Used tyre storage	170 used tyres (120 HV tyres and 30 LV tyres)
Category 64: Class II putrescible landfill	1,034 tonnes
Category 73: Bulk storage of chemicals	<b>LNG</b> = 394 kL Tank farm A (4 x 49.25 kL tanks) Tank farm B (3 x 49.25 kL tanks) <b>Diesel</b> = 554 kL New fuel farm (3 x 110,000 L tanks) Old fuel farm (3 x 57,000 L +1 x 53,000 L tanks)
Category 85: Sewage facility	Daily average = 35.52 m <sup>3</sup> per day Refer to Section E
Category 6: Dewatering	21,140 tonnes (0.021 gegalitres)
Category 85B: Water desalination plant	0.47 gegalitres

<b>Section D – Statement of actual Part 2 waste discharge quantity</b>	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
<b>Prescribed premises category</b>	<b>Actual Part 2 waste discharge quantity</b>
Category 5: Processing or beneficiation of metallic and non-metallic ore	1,852,630 tonnes to the tailings storage facility 879,357 tonnes to the coarse reject load out
Category 6: Dewatering	21,140 tonnes (0.021 gegalitres)
Category 85B: Water desalination plant	0.33 gegalitres

**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:	Condition 1 Table 2 Condition 7	Date(s) of non-compliance:	16/01/20, 19/02/20, 15/04/20, 18/05/20, 14/07/20, 17/09/20, 24/09/20, 15/10/20, 19/11/20, 17/12/20
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Details of non-compliance:

Effluent quality testing during the reporting period identified a number of events that exceeded the Treated Effluent Quality Limits, as described in Table 6 of the Licence.

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 impact of this non-compliance is considered to be negligible, as all treated waste water is discharged into the approved spray field facility.

No complaints or hazards were received during this reporting period.

Inspections of the WWTP and spray field occurred in February, April, May, June, July, September, and October 2020. Inspections during the reporting period did not identify any issues and documented minimal odour from the spray field facility, healthy vegetation and evidence of local fauna utilising area.

WWTP Effluent Quality Exceedances are listed in Attachment 2.

Cause (or suspected cause) of non-compliance:

Suspected causes of the non-compliances are listed below:

- Incorrect sampling methods sampling stagnant water rather than active discharge water.
- Sampling of the system immediately after a full tank clean resulting in a period of imbalance.
- Failures and blockages during the period and repairs resulting in a period of re-stabilisation.
- Irregular overload of the WWTP during periods of unexpectedly high waste water inflows resulting in a greater volume of water being pushed through the system followed by a period of re-stabilisation.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

Actions undertaken to mitigate impacts and prevent non-compliance:

- Sampling methodology (work instruction) updated in Q2 2020 to ensure that sample is obtained while WWTP is discharging to the spray field.
- Sludge removal and maintenance of the system.
- PMI will continue to engage a third party waste water specialist to regularly maintain the WWTP.
- PMI will engage the specialist to complete a holistic review of the system and recommend improvements to mitigate future non-compliances in the future.
- Ongoing inspections of the spray field to ensure that potential impacts to vegetation are identified early and, if required, mitigation measures are implemented.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /

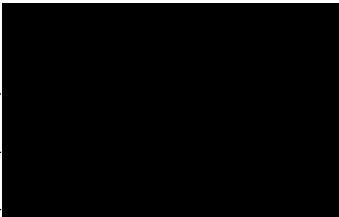
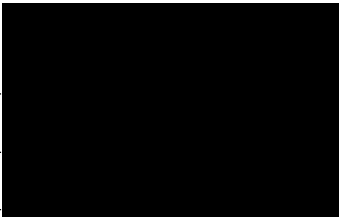
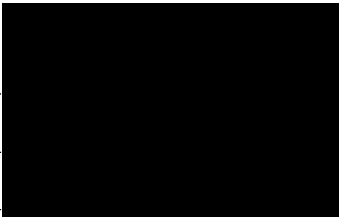
Reported to DWER in writing

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:	Condition 1 Table 2	Date(s) of non-compliance:	Q3 – Q4 2020
Details of non-compliance:			
<p>A landfill was constructed in waste rock landform 2 during Q3 of the 2020 reporting period.</p> <p>The new landfill was constructed approximately 250 meters to the west of the proposed footprint outlined in Figure 2 Schedule 1 in Licence L9037/2017/1, within waste rock landform 2 (in accordance with Mining Proposal REG ID 72948).</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <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 impact of this non-compliance is considered to be negligible.</p> <p>The landfill is located within the same waste rock landform as the original proposed landfill shown in Figure 2 of the Licence. Please see attached figure documenting the position of the new landfill compared to the proposed outline within waste rock landform 2 (Attachment 3).</p> <p>All waste was disposed of according to MRL site policies, procedures and Licence conditions.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The amendment request for the new landfill location in waste rock landform 2 was drafted prior to the operational requirement for the landfill therefore the submitted polygon was a proposed location based on mine planning at the time of submission.</p> <p>Since approval of the amendment with the secondary landfill the mine plan has progressed and been re-optimised. This has included key HV and LV roads, and interactions within the original proposed landfill location.</p> <p>The landfill new location was determined based on an area within the approved waste rock landform 2 that was safe, accessible and positioned to ensure a substantial layer of waste rock encapsulating the landfill.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>PMI is currently reviewing the future progression of Waste Dump 2 to identify a suitable strategy for landfilling. PMI will engage DWER to discuss an amendment to the Part V Licence to reflect a more functional landfill boundary while maintaining all Licence conditions.</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			
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:	10	Date(s) of non-compliance:	15 January 2020
Details of non-compliance:			
<p>RO Brine water was discharged into the Mining Turkeys Nest during the reporting period. Water from this turkey's nest is used for dust suppression.</p> <p>This non-compliance was reported in the 2019 AER and managed by PMI in consultation with DWER during this reporting period.</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>Actual environmental impact is considered negligible.</p> <p>DWER was advised on this issue on 27 March 2020. PMI responded to DWER's questions on 6 May 2020 and provided additional information on 1 September 2020.</p> <p>No additional information has been sought from PMI in relation to this matter.</p>			
Cause (or suspected cause) of non-compliance:			
Please refer to previous information supplied.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Please refer to previous information supplied.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: 27 / 03 / 2020	

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:	17	Date(s) of non-compliance:	Q1 2020
Details of non-compliance:			
Standing water levels (SWL) were not recorded at the monitoring bore MTMPZ4 shown in Figure 4 Schedule 2 during Quarter 1 2020 due to inclement weather.			
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.			
<p>The environmental impact of this non-compliance is considered to be negligible.</p> <p>The volume and quality of tailings deposited within Ghost Crab Pit during Q1 2020 remained consistent with production data as well as the actual deposition achieved within these periods.</p> <p>Monitoring data collected within the 2020 recording period was consistent with what has been recorded during previous periods.</p>			
Cause (or suspected cause) of non-compliance:			
The environmental technician (external consultant) was unable to access the monitoring bore during the scheduled Q1 sampling visit due to inclement weather making the tracks impassable.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monthly review of compliance tasks and information will trigger additional sampling, if required, to meet quarterly sampling requirements.			
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: / /	

<b>Section F – Declaration</b>			
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.			
Signature <sup>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:	30/03/2021	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.