



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L5415/1988/9	Licence file number:	DER2013/00900 1
Licence holder:	BHP Billiton Iron Ore Pty Ltd		
Trading as:	BHP Billiton Iron Ore Pty Ltd		
ACN:	008 700 981		
Registered address:	Level 1, City Square Brookfield Place 125 St Georges Terrace PERTH WA 6000		
Reporting period:	01/07/2019 to 30/06/2020		

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">• 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
5 – Processing or beneficiation of metallic or non-metallic ore	74.99 Mt
12 - Screening	150,811 t
54 – Sewage facility	Sewage facilities discharged to lined evaporation ponds
64 – Class II putrescible landfill site	0 t
73 – Bulk Storage of Chemicals	2.800 m ³ in aggregate

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
6 - Mine dewatering	14.49 GL

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:	2.2.1	Date(s) of non-compliance:	Q2
Details of non-compliance:			
<p>Condition 2.2.1 of L5415/1988/9 requires emission to surface water at FNJV0150 (Orebody 31 Creek discharge) to be done as a contingency discharge to creek line (tributary of Jimblebar Creek) during high rainfall, maintenance and/or emergency events.</p> <p>In December, a leaking valve at OB31 Discharge Point (FNJV0150) resulted in discharge of approximately 321 kL of groundwater into a tributary of Jimblebar Creek. The discharge was unplanned and the result of a leak.</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>			
The discharged water remained localised to the discharge point, and subsequent water quality monitoring of the source water did not indicate any potential environmental impact.			
Cause (or suspected cause) of non-compliance:			
A valve near the FNJV0150 discharge point was found to be leaking during an investigation into the cause.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Immediate actions taken:</p> <ul style="list-style-type: none"> • BHP Internal incident reporting notification raised; • Investigation into faulty equipment, immediate maintenance and scheduled replacement; and • Riparian vegetation monitoring survey program (Biannual) scheduled. <p>Measures taken to prevent recurrence:</p> <ul style="list-style-type: none"> • The faulty valve was replaced successfully with no further incident. 			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, reported in writing to DWER			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 04/02/2020	

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:	3.2.1	Date(s) of non-compliance:	Q2
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Details of non-compliance:

Condition 3.2.1 of L5415/1988/9 requires monitoring of emissions to surface water. Two discharge points were not monitored during FY2020 Quarter 2 (October to December 2019) (Q2).

Missed Sample Event 1

Please see text above in Condition 2.2.1 for more information regarding this potential non-compliance. Monitoring of chemistry and flow rate is required during "monthly during discharge" at FNJV0150. As the discharge was unplanned and the result of a leak, monitoring did not occur as required by the licence condition.

Missed Sample Event 2

All water quality parameters were not measured during Q2 at JBDMDEW001 (Main Pipeline Sample Point) as required quarterly by the licence 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.

Missed Sample Event 1

Please see text above in Condition 2.2.1 for more information regarding this potential non-compliance.

Missed Sample Event 2

The next sampling at JBDMDEW001 was brought forward and the subsequent water quality data did not indicate any potential environmental impact.

Cause (or suspected cause) of non-compliance:

Missed Sample Event 1

Please see text above in Condition 2.2.1 for more information regarding this potential non-compliance.

Missed Sample Event 2

JBDMDEW001 (Main Pipeline Sample Point) sampling was not undertaken during Q2 due to contractor resource constraints and weather impacts during the month of December, and the failure to collect samples was not identified prior to the end of the quarter.

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

Missed Sample Event 1 - FNJV0150

Please see text above in Condition 2.2.1 for more information regarding this potential non-compliance.

Missed Sample Event 2 - JBDMDEW001

Immediate action taken:

- BHP Internal investigation and meeting with involved contractor;
- Sampling re-scheduled and for missed sites; and
- Courtesy notification to DWER (emailed on 4/2/2020).

Section E – Details of Non-Compliance with Licence Condition

Measures taken to prevent recurrence:

- Meeting with contractor to resolve issues; and
- Prioritisation in sampling run list of Licence critical samples vs routine sampling.

Was this non-compliance previously reported to DWER?

Yes, both events reported in writing to DWER

Reported to DWER verbally

Date: / /

FNJV0150 (Occurred 10/12/2019) JBDMDEW001 (Occurred 31/12/2019)

Reported to DWER in writing

Date: 04/02/2020

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:	3.3.1	Date(s) of non-compliance:	Q2
Details of non-compliance:			
Condition 3.3.1 of L5415/1988/9 requires monitoring of emissions to ground water.			
All water quality parameters were not measured during Q2 at JBDMDEW001 (Main Pipeline Sample Point) as required quarterly by the licence condition. Please see text above in Condition 3.2.1 for more information regarding this potential non-compliance.			
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.			
Please see text above in Condition 3.2.1 for more information regarding this potential non-compliance.			
Cause (or suspected cause) of non-compliance:			
Please see text above in Condition 3.2.1 for more information regarding this potential non-compliance.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Please see text above in Condition 3.2.1 for more information regarding this potential non-compliance.			
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: 04/02/2020	

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:	3.5.1	Date(s) of non-compliance:	Q2 and Q4
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Details of non-compliance:

Condition 3.5.1 of L5415/1988/9 requires monitoring of groundwater quality.

Missed Sample Event 1

Environmental sampling did not occur at five (5) groundwater monitoring locations as required by the licence condition in Q2.

Monitoring Point
HMG0103M
JBGW0115M
HMG0119M
JBGW0080M
SJ0571RM

Missed Sample Event 2

Environmental sampling did not occur at one groundwater monitoring locations as required by the licence condition in FY 2020 Quarter 4 (April to June 2020) (Q4).

Monitoring Point
SJ0571RM

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.

Missed Sample Events 1 and 2

Environmental monitoring samples were taken in subsequent quarters (Q3 FY2020 and Q1 FY2021) which confirmed that the water quality remained consistent with previous monitoring and therefore there was no environmental impact.

Cause (or suspected cause) of non-compliance:

Missed Events 1 and 2

Communication breakdown between contractor and BHP site staff led to samples not being taken within allocated timeframe. The sampling was not undertaken due to contractor resource constraints and weather impacts during the months of December 2019 and June 2020. The failure to collect samples was not identified prior to the end of the quarter.

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

Missed Events 1 and 2

Immediate action taken:

- BHP Internal incident reporting notification raised followed with internal investigation and meeting with involved contractor;
- Sampling re-scheduled for missed sites; and
- Courtesy notification to DWER (emailed on 4/2/2020) for Event 1.

Measures taken to prevent recurrence:

- Meeting with contractor to resolve issues;

Section E – Details of Non-Compliance with Licence Condition

- Subsequent re-scheduling of sampling within quarterly timeframe to bring sampling forward during quarterly window, allowing more time for addressing unforeseen logistical issues; and
- Prioritisation of licence critical samples vs. routine sampling.

Was this non-compliance previously reported to DWER?

Missed Event 1

Yes, and

Reported to DWER verbally

Date: / /

Reported to DWER in writing

Date: 04/02/2020

Missed Event 2

No

Reported to DWER verbally

Date: / /

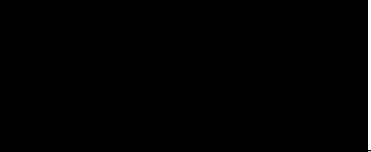

Reported to DWER in writing

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:	Acting Asset President Western Australian Iron Ore	Position:	
Date:	02/09/2020	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.