



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, 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:	L8621/2011/1	Licence file number:	2011/009784
Licence holder name:	Roy Hill Iron Ore Pty Ltd		
Trading as:	Roy Hill Iron Ore Pty Ltd		
ACN:	123 722 038		
Registered business address:	5 Whitham Road PERTH AIRPORT WA 6105		
Reporting period:	01/01/20 to 31/12/20		

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 in 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	68,553,532 tonnes / annual period processed 52,692,156 tonnes / annual period produced 250,1262 tonnes for Magnetic Separation Plant
6	11,486,983 kL/tonnes / annual period
12	447,269 tonnes / annual period
52	0 MW
73	5,102 m ³ maximum
85B	2.8 G/L per year

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
54	AV WWTP – 327 m ³ /day MSA WWTP – 9 m ³ /day PSA WWTP – 11.5 m ³ /day
57	965.61 tonnes / annual period No more than 1,000 used tyres stored on site
64	Inert waste Type 1 – 0 tonnes Putrescible Waste – 2228.11 tonnes Clean Fill – 0 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:	1.2.6	Date(s) of non-compliance:	June 2020
Details of non-compliance:			
During site audit, Type 2 waste in a trench which was recently backfilled was not covered in soil to a depth of 1,000mm, as required in 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.			
It is not expected that any environmental impact occurred from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Responsible site team unclear of licence requirements.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Landfill site team was informed of non-compliance during site audit and the trench was properly backfilled covering the tyres, as per licence 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: / /	

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:	1.2.8	Date(s) of non-compliance:	June & December 2020
Details of non-compliance:			
During the site audit, there was evidence of windblown waste within the interior of the Landfill, along the fence line, as well as pieces of larger waste outside the landfill.			
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.			
It is unlikely that any environmental impact occurred from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Illegal dumping of waste outside of the landfill facility potentially occurred. The majority of waste was wind-blown.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Relevant site team were informed of non-compliance and advised to perform clean-up of waste. Site team confirmed that waste was retrieved and properly disposed of.			
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:	1.2.10	Date(s) of non-compliance:	June & December 2020
Details of non-compliance:			
The TSF delivery pipeline secondary containment is not sufficient to contain a spill for a period equal to the time between routine inspections.			
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 silt pit is in the process of being dredged out however inclement weather had greatly affected the ability to access the area and prevented it from being completed before completion of this report.			
Cause (or suspected cause) of non-compliance:			
The silt pit is in the process of being dredged out however inclement weather had greatly affected the ability to access the area and prevented it from being completed before completion of this report.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Relevant site team was informed of non-compliance and confirmed that secondary containment will be dredged out as soon as weather permitted, and area is accessible again. This is scheduled to be completed by April 2021.			
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:	3.1.2	Date(s) of non-compliance:	April/May 2020
Details of non-compliance:			
Not monthly monitoring was undertaken at least 15 days apart with sampling of above ground TSF groundwater monitoring in April and May only taken 13 days apart and sampling for four injection bores taken 9 days apart between March and April.			
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.			
It is not expected that any environmental impact occurred as a result of this error in sampling.			
Cause (or suspected cause) of non-compliance:			
This non-compliance was due to an error in the site monitoring schedule.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monitoring schedule was rectified to ensure monitoring dates are captured correctly and site environment team informed of non-compliance.			
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:	3.6.1	Date(s) of non-compliance:	February 2020
Details of non-compliance:			
<p>Laboratory errors contributed to missing analytes during one quarter for monitoring bores, including:</p> <p>Bicarbonate Alkalinity as HCO₃ was not captured for seven bores (RHPZ0088, RHIB0218s, RHIB0219s, RHIB02221s, RHIB0239s, RHIB0272s, RHIB0274s).</p> <p>Nitrate and Nitrite was not captured for 21 bores (RHPZ0088, RHPZ0288s, RHPZ0289s, RHIB0218s, RHIB0219s, RHIB02221s, RHIB0238s, RHIB0239s, RHIB0240s, RHIB0241s, RHIB0265s, RHIB0266s, RHIB0267s, RHIB268s, RHIB0269s, RHIB0270s, RHIB0271s, RHIB0272s, RHIB0273s, RHIB0274s, RHIB0276s)</p> <p>Z5IPTSF bore RHPZ0117 was not sampled in January and RHPZ0119 was not sampled in January and February, as they were inaccessible due to flooding. Z5IPTSF bore RHPZ0107 was found to be blocked in May and subsequently was no longer able to have SWLs recorded.</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>			
It is unlikely that there was any measurable environmental impact as a result of this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Bicarbonate Alkalinity as HCO ₃ , Nitrate and Nitrite were omitted from lab testing, this was a lab error.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The site environment team attempted to re-sample the bores for these analytes, however it was too late to sample within Licence sampling time requirements. The site team reviewed the laboratory quotes and updated them to ensure all required analytes were included. This non-compliance has been communicated with the laboratory and the site team are now receiving all required analytes from laboratory results.</p> <p>Site environment team informed of non-compliance.</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 / 04 / 20	

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:	2.2.2	Date(s) of non-compliance:	August 2020
Details of non-compliance:			
Three MAR SWIB injection bores RHIB0128, RHIB0263 and RHIB0266, recorded exceedances for TDS during Quarter 3 of the audit period.			
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.			
No environmental impact occurred as result of this non-compliance.			
Cause (or suspected cause) of non-compliance:			
The exceedance in EC was determined to be the result of commissioning of a high saline bore within the Echo Pit borefield.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
These exceedances were reported to DER via an N1 Form (2011/009784-1). The incident was investigated and resolved.			
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: 08 / 10 / 20	

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:	4.3.1	Date(s) of non-compliance:	August 2020
Details of non-compliance:			
<p>There was a breach of limits of TDS for SWIB bores RHIB0128, RHIB0263 and RHIB0266 during the audit period. The N1 form (2011/009784-1) was not submitted until after the required deadline. Investigation was undertaken to determine fault and several measures were put in place to prevent an incident occurring again.</p> <p>One bore log was submitted to DWER late (after 30 days of installation).</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>No environmental impact occurred as result of this non-compliance.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Oversight from relevant teams to facilitate the timely submission of compliance documentation to DWER.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Relevant teams within Roy Hill made aware of the importance of expediting N1 forms, bore logs and other relevant information to ensure compliance documentation can be completed and communicated to DWER on time.</p> <p>Several measures were put in place to prevent a recurrence of the incident:</p> <ul style="list-style-type: none"> • Roy Hill Water Operations are moving towards increased monitoring of the SCADA system through a full time Operator in the Roy Hill Remote Operations Centre (anticipated start December 2020), which will improve response time if bores exceed the EC limit. • Improved identification of risk scenarios regarding commissioning of new dewatering borefields to reduce the likelihood of spikes in EC sent to injection. <p>Relevant teams have been reminded of the licence requirements around submission of compliance documentation within timeframe required under 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 F – Declaration

<p>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.</p> <p>I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.</p>			
Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:		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.