



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

Section A – Licence details

Licence number:	L4513/1969/18	Licence file number:	DER2013/001083
Licence holder name:	BHP Iron Ore Pty Ltd		
Trading as:	BHP Iron Ore Pty Ltd		
ACN:	008 700 981		
Registered business address:	Level 1, City Square Brookfield Place 125 St Georges Terrace Perth WA 6000		
Reporting period:	01/07/2023 to 30/06/2024		

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)

☐ Yes – please complete:

- section C;
- section D (if required); and
- sign the declaration in Section F.

☒ No – please complete:

- 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 – Processing or beneficiation of metallic or non-metallic ore	75.29 Mt
54 – Sewage facility	0.185 m ³ average per day 67.50 m ³ in reporting period
58 – Bulk material loading or unloading	287.73 Mt
61 – Liquid waste facility	5,051.3 t
73 – Bulk storage of chemicals etc.	63,316.8 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

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	Date(s) of non-compliance:	11 March 2024
Details of non-compliance:			
<p>Pump testing has been completed at BHPs Port operations in support of the Car Dumper 6 Project. This activity, undertaken in accordance with BHPs 26D <i>Rights In Water and Irrigation Act (RIWI Act)</i> licence (ref RF946-14~16), involved the abstraction and storage of water in two Enduraline X 7 PVC Sheet pillow bladders (Bladder 1 and Bladder 2), with a total capacity of 600 kL. Test pumping activities were completed on 9 March 2024 with a total of 485 kL of groundwater abstracted and stored in Bladder 2 (380 kL) and Bladder 1 (105 kL). Both bladders are stored in a single cell, earthen bund located in close proximity to the test well. On 11 March 2024 a leak was detected at Bladder 2, from which the contents of the bladder drained on the ground. The water discharge was not an authorised emission under Condition 1.</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>The non-compliance has no known or suspected environmental impact.</p> <p>All water samples collected were reported below the trigger levels specified in the Pumping Test Management Plan, which was submitted in support of Section 26D Licence (ref PS206107-004-M Rev2).</p>			
Cause (or suspected cause) of non-compliance:			
<p>The leak occurred from the intake valve on the underside of the bladder. Due to the weight of the bladder and safety restrictions, the area of concern could not be inspected and/or repaired. The water was contained within a secondary earthen bund.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Immediate actions:</p> <p>The leak was sandbagged, and the containment walls of the earthen bund were increased in height and width to provide further containment capacity and reinforce existing containment. Additional water samples were collected.</p> <p>Follow up actions:</p> <p>An internal incident was raised, and an internal investigation was completed. A Waste Discharge Notification Form was submitted to DWER on 14 March 2024. Following the submission of additional water quality results and photos of the fortified earthen bund it was confirmed that no further actions were required from BHP by DWER on 18 April 2024.</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: 14 March 2024	

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:	16	Date(s) of non-compliance:	August 2023 to May 2024
Details of non-compliance:			
From August 2023 to May 2024 the 90% Average Monthly Availability rate for fogging units was not achieved.			
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.			
<p>The non-compliance has no known or suspected environmental impact.</p> <p>Throughout FY2024, the Licence Holder achieved a Dust Extinction Moisture (DEM) content of above 90% for all ore in-loaded and out-loaded at the premises.</p> <p>Air quality exceedance events at the boundary air quality monitors and the ambient air quality monitor during these months were reported to DWER in quarterly reports, as required under the licence. Upon completion of an investigation for each of the dust exceedance events, fogging unit availability was not considered as a significant contributing factor. No impact to dust suppression effectiveness was observed as a result of this reduced availability.</p>			
Cause (or suspected cause) of non-compliance:			
The reduced availability for fogging units in FY2024 is attributed to the Nelson Point South Yard fogging units. Fogging unit availability was impacted by intermittent faults across the South Yard fogging network from water ingress into airlines, contributing to premature failure of compressor components. The compressor was replaced in May 2024.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The South Yard fogging unit compressor was replaced in May 2024 with improved availability observed in June 2024 (>90%).			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: N/A	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 31 October 2023, 31 January 2024, 30 April 2024 and 30 July 2024.	

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:	16 and Schedule 4, Table 11, Column 3, Item 12.	Date(s) of non-compliance:	1 July 2023 – 30 June 2024
Details of non-compliance:			
<p>The 90% Average Monthly Availability rate for stockpile cannons was not measured or reported for the FY2024 reporting period.</p> <p>Condition 16 of L4513/1969/18 does not list Stockpile cannons as an equipment item required to be maintained and measured on 90% Average Monthly Availability Rate; however, in Schedule 4, Table 11, Column 3, Item 12 for Stockpile cannons, reference is made to stockpile cannons operating in accordance with Condition 16. BHP interprets this to mean stockpile cannons must meet the 90% requirement.</p> <p>No measurements were taken, therefore we cannot confirm compliance with the requirement for 90% Average Monthly Availability, as that requirement relates to stockpile cannons at the Port. The stockpile cannons have been operated routinely on automatic deluge runs and manually when in accordance with Conditions 25 to 29. There has not been any occurrence where stockpile cannons have been required and have not been available.</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>			
The non-compliance has no known or suspected environmental impact.			
Cause (or suspected cause) of non-compliance:			
<p>Stockpile cannons were not specifically listed under the Condition 16 which specifies the equipment required to maintain 90% Average Monthly Availability rate compliance.</p> <p>BHP does not currently have the equipment availability tracking software and coding to accurately provide this data.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>BHP identified the non-compliance and have engaged developers to add the data path for each stockpile cannon into the BHP dust equipment monitoring dashboard, so that data can be captured and measured to calculate the stockpile cannon 90% Average Monthly Availability. This project was complete as at end of FY2024 to allow for calculations in FY2025.</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: 31 July 2023	

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 :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:	26/09/2024	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.