



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details

Licence number:	L4612/1989/11	Licence file number:	2012/006877
Licence holder:	BHP Nickel West Pty Ltd		
Trading as:	Nickel West Leinster		
ACN:	004 184 598		
Registered address:	125 St Georges Terrace Perth WA 6000		
Reporting period:	01/08/2021 to 31/07/2022		

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 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	2,782,734.89 tonnes

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	1,342,341.72 tonnes
12	127,920 tonnes
57	<500 used tyres stored at any time
64	1,339 tonnes
85	33.66 average m ³ per day

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:	July 2022
Details of non-compliance:			
<p>A recent review of the Leinster Operation groundwater monitoring data, for the period 1st August 2021 to 31st July 2022, identified the following data gaps in compliance with the licenced monitoring schedule Table 3 Groundwater monitoring bore sampling regime:</p> <p>Recovery bore flow meters were read on a monthly basis however the bore status and date of meter reading was not recorded.</p> <p>Standing Water Level was not obtained for the following bores:</p> <ul style="list-style-type: none"> • MB72 and MB74 (No depth to water taken September 2021) • MB75 and MB76 (No depth to water taken December 2021) • EPMB06A and EPMB12 (No depth to water taken March 2022) <p>Nickel and TDS Analytical Data was not obtained for the following bores:</p> <ul style="list-style-type: none"> • MB06 and EPRB02 (Bore not running at time of sampling) • MB75 and MB76 (Bore not sampled) • EPMB02A (No access to bore) • EPMB06A (Bore casing damaged / blocked) • EPMB07A (Bore casing blocked) • EPMB12 (Bore casing damaged) • EPMB15A (Bore casing blocked) <p>No TDS Analytical Data collected during September and June 2021</p> <ul style="list-style-type: none"> • STO1 • STO3 • ST07 • ST10 <p>Electrical conductivity profile not undertaken:</p> <ul style="list-style-type: none"> • MB60 (Bore casing blocked September 2021, March and June 2022) • MB62 and MB63 (Bore not sampled December 2021) • MB72 (Bore not sampled, annual requirement only) 			
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>			
<p>No environmental impact has occurred as a consequence of missing groundwater monitoring data. This non-compliance relates to non-adherence to the frequency for groundwater monitoring and in some circumstances, the inability to provide data from certain monitoring sites.</p>			

Department of Water and Environmental Regulation

Cause (or suspected cause) of non-compliance:	
Throughout the reporting period groundwater monitoring parameters were not able to be obtained from multiple bores due to access constraints such as safety concerns as a result of nearby mining, bore casing integrity issues and miscommunication between the groundwater monitoring contractor and analytical laboratory relating to the frequency of monitoring requirements.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
A review of monitoring bore access and bore casing condition will be conducted, with both bore access and bore casings to be reinstated to support future groundwater monitoring requirements. Field sheets will also be reviewed and monitoring requirements freshly communicated to the water monitoring contractor.	
Was this non-compliance previously reported to DWER?	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 31/10/2022 (Leinster AER/AACR 2022)

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:	22a	Date(s) of non-compliance:	September 2021
Details of non-compliance:			
Review and preparation of the AACR in October 2022 identified this no conformance and as such no notification was made to the CEO immediately, once it was determined that the compliance monitoring bore MB42 was above the 6m bgl target in September 2021.			
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 has occurred as a consequence of the miscommunication. This non-compliance is administrative only. No significant environmental impacts were observed.			
A Groundwater Recovery Program does exist and as a result of this program an additional recovery bore was installed in August 2021. As a result of this additional recovery bore (MB08), as well as the existing recovery bore (MB06) being more reliant due to equipment upgrades, the water level returned to and maintained a level greater than the trigger investigation licence depth of 6 metres for the remainder of the licence period.			
Cause (or suspected cause) of non-compliance:			
Investigation currently underway to review incident.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Environment Data Management System has recently been upgraded. Licence limits and triggers have been added to the system which will enable immediate notification to the environment team when a limit or target has been breached.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 31/10/2022 (Leinster AER 2022)	

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:	General Manager - General Manager Concentrator & Integrated Operations	Position:	
Date:	31/10/2022	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.