



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V Division 3*

### Section A – Licence details

Licence number:	L5415/1988/9	Licence file number:	DER2013/00900 1
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:	01/07/2022 to 30/06/2023		

### 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	61.4 mt
12 – Screening etc. of material	165,985 t
54 – Sewage facility	12 m <sup>3</sup> /day
64 – Class II putrescible landfill site	0
73 – Bulk storage of chemicals	2,800 m <sup>3</sup> 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	27.14 GL/a

### Section E – Details of non-compliance with licence condition

Please use a separate page for each condition with which the license holder was non-compliant at a time during the reporting period.

Condition no:	Condition 3.2.1 and 3.3.1	Date(s) of non-compliance:	31 December 2022
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Details of non-compliance:

The reinjection/creek discharge point FJB0016 was not monitored for Q2 for the groundwater quality parameters required by Condition 3.2.1 (Table 3.2.1) and Condition 3.3.1 (Table 3.3.1). Quarterly hydrochemistry analysis is required when discharging/reinjecting. There was reinjection and discharge recorded for Q2 at the Caramulla MAR Scheme and creek discharge point.

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.

There was no actual or suspected environmental impact for not recording hydrochemistry data for Q2 for FJB0016.



Cause (or suspected cause) of non-compliance:

Discharge was ceased to Caramulla Creek on 23 November 2022 following an exceedance of the wetting front threshold criteria (ID0043976). Following the cessation of creek discharge, water was diverted from the Caramulla Scheme and the turkey nest (FJB0016) water levels dropped. During the quarterly monitoring, the contractor was unable to retrieve a sample due to the water levels. FJB0016 was scheduled to be sampled in December for Q2, however a rainfall event resulted in access to be restricted to the sample point.

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

Data was successfully collected for Q3 and Q4.

Was this non-compliance previously reported to DWER?

☐ Yes, reported in writing to DWER

☐ 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 3.2.1	Date(s) of non-compliance:	30 June 2023
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Details of non-compliance:

Orebody 31 Creek Discharge point FNJV0150 was not sampled in Q4 for water quality parameter as required by Condition 3.2.1 (Table 3.2.1).

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.

During Q4 in June 2023, a maintenance event to calibrate the Orebody 31 creek discharge point flow meter resulted in 24 kL being discharged to the creek. There is no actual or suspected environmental impact of the event given the discharged amount was minor (24 kL).



Cause (or suspected cause) of non-compliance:

A water sample was not obtained by the contractor before the end of the Q4 to fulfil the licence requirement following the annual maintenance event to calibrate the FNJV0150 flow meter.

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

Internal processes are now in place to ensure that reporting occurs in line with licence conditions for annual maintenance events of flow meter calibrations.

Was this non-compliance previously reported to DWER?

☐ Yes, reported in writing to DWER

☐ 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 3.6.1	Date(s) of non-compliance:	30 September 2022, 31 December 2022, 31 March 2023 and 30 June 2023
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## Details of non-compliance:

The L1 Jimblebar Oily Wastewater Treatment Plant (JBDMOWW007) monitoring point exceeded the Total Recoverable Hydrocarbons (TRH) licence limit of 15 mg/L for each quarter in FY2023. The treated oily wastewater is used for dust suppression on site and is sampled quarterly as per licence requirements.

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.

There was no actual or suspected environmental impact from the TRH limit exceedance in FY2023. The L1 outflow line discharges to the South Jimblebar turkey's nest and is significantly diluted with raw dewatering water before being used for dust suppression. Monthly TRH samples of the South Jimblebar Turkey Nest confirmed that the TRH did not exceed the 15 mg/L limit and therefore was used for dust suppression.



## Cause (or suspected cause) of non-compliance:

The sample point is no longer an accurate reflection of the water being used for dust suppression as the standpipe for the water trucks is now located at the South Jimblebar Turkey Nest.

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

A License Amendment is currently being drafted for submission to update the licence point. Monthly samples will continue to be taken from South Jimblebar Turkey Nest to ensure the TRH concentration is not exceeding the limit for dust suppression.

## DWER inspection interim outcomes:

Representatives advised DWER inspectors that the monitoring point reference in Table 3.6.1 needs to be amended to instead list the Turkey's Nest in South Jimblebar. BHP representatives advised that an application to amend the License is being drafted.

Was this non-compliance previously reported to DWER?

☒ Yes, reported in writing to DWER

☐ Reported to DWER verbally

Date:

☒ Reported to DWER in writing

Date: 23/05/2023 (ID 0074190)



**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 3.3.1	Date(s) of non-compliance:	31 December 2022
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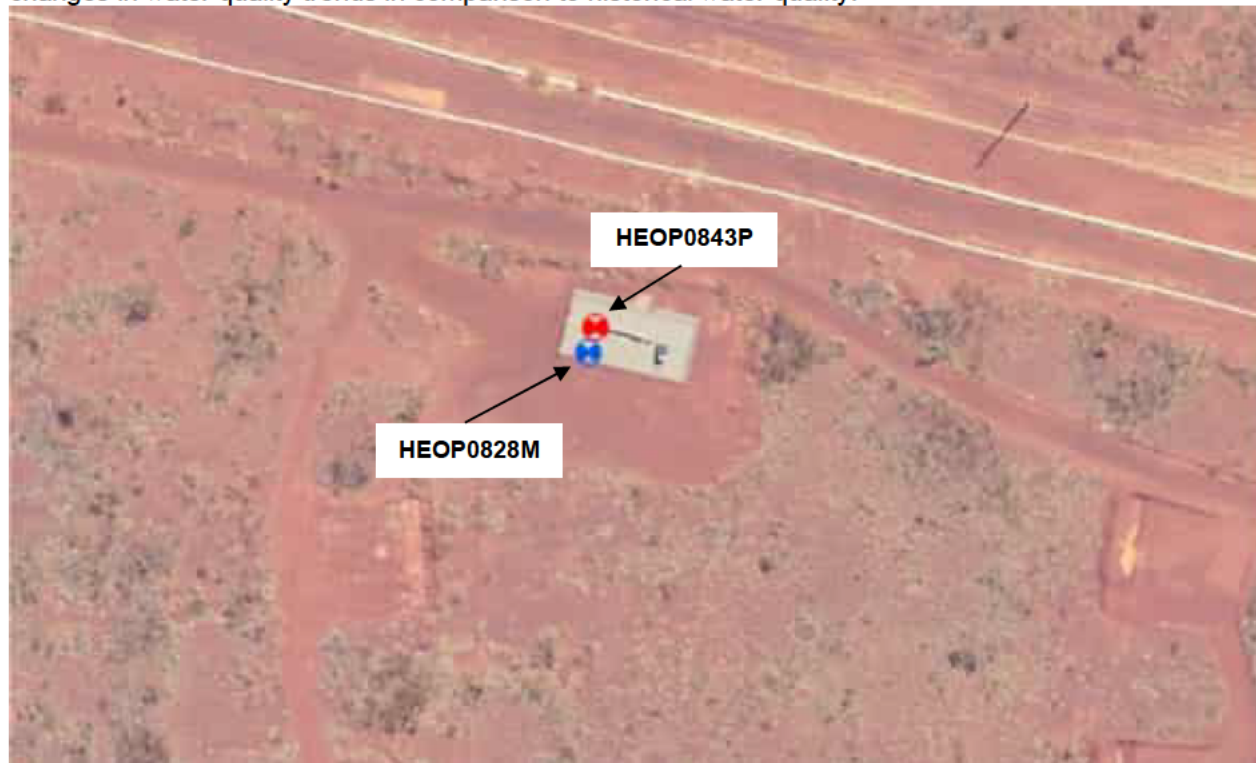
Details of non-compliance:

The reinjection bore HEOP0843P was not monitored for Q2 for the groundwater quality parameters required by Condition 3.3.1 (Table 3.3.1).

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.

There was no actual or suspected environmental impact from not sampling during this quarter. The adjacent ambient monitoring bore (HEOP0828M) was sampled in Q2 and did not report any notable changes in water quality trends in comparison to historical water quality.



Cause (or suspected cause) of non-compliance:

There was a fault with the telemetered equipment.

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

The telemetered equipment was replaced, and data was successfully recorded for Q3 and Q4 of FY2023.

Was this non-compliance previously reported to DWER?

☐ Yes, reported in writing to DWER

☐ 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 3.3.1	Date(s) of non-compliance:	31 December 2022
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Details of non-compliance:

The monitoring point HSJ0069P was not monitored in Q2 for the groundwater quality parameters required by Condition 3.3.1 (Table 3.3.1).

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.

A small volume of water (1,644 kL) was reinjected during October 2022, no further reinjection has occurred since. There was no actual or suspected environmental impact from not sampling during this quarter. The water quality of the two adjacent reinjection bores (HSJ0003P and HSJ0076P) were sampled during Q2 and did not report any notable change in water quality trends in comparison to historical water quality.



Cause (or suspected cause) of non-compliance:

As groundwater reinjection was limited during October and no reinjection occurred during November 2022, the scheduled November quarterly water sample was not collected as reinjection has ceased during this time.

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

The South Jimblebar reinjection network was disconnected in May 2023 and will be removed from the License in the next License Amendment.

Was this non-compliance previously reported to DWER?

☐ Yes, reported in writing to DWER

☐ 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 3.3.1	Date(s) of non-compliance:	30 June 2023
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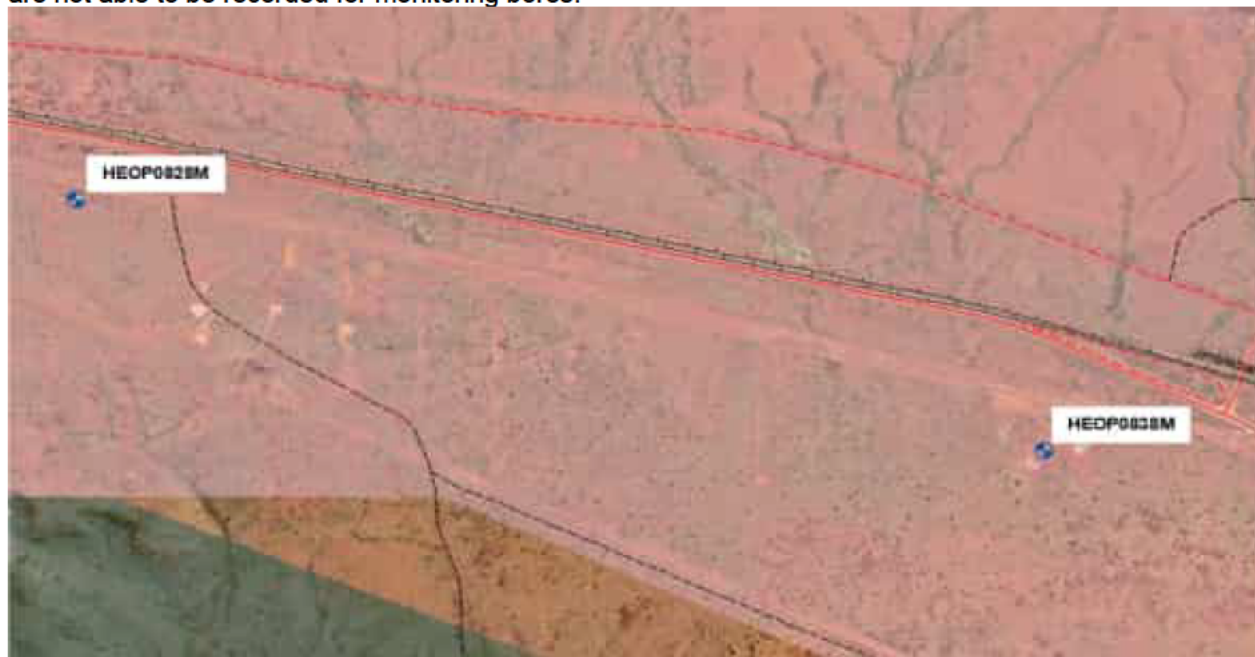
Details of non-compliance:

Monthly flow rate and cumulative volume data for OB18 MAR groundwater monitoring bores (HEOP0828M and HEOP0838M) were unable to be recorded for FY2023. The Licence Amendment granted on 17 March 2022 included a change to the licence not requested by BHP to undertake monthly flow rate and cumulative volume monitoring for the two monitoring bores (Table 3.3.1). The two monitoring bores were requested to be removed in the July 2022 Licence Amendment, but DWER advised that *'the removal of the bores would require a review of the risk assessment and advice from the Department's hydrogeologist, which was not undertaken during the assessment of the current Licence Amendment'*.

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.

There was no actual or suspected environmental impact as flow rate and cumulative volume data readings are not able to be recorded for monitoring bores.



Cause (or suspected cause) of non-compliance:

The cause of the non-compliance is an administrative error during the Licence Amendment process.

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

Licence Amendment discussions are currently underway to request Table 3.3.1 to be updated to only require monthly monitoring of water level for the two bores and remove the cumulative volume and flow rate monitoring requirements.

**DWER inspection interim outcomes:** The Licensee is to provide either monitoring data for bore HEOP0842M or an update on the addition of the bore to the sampling program for FY2023. This is to be provided 21 days from the date of the inspection report cover letter.

Was this non-compliance previously reported to DWER?

☒ Yes, reported in writing to DWER

☐ Reported to DWER verbally

Date:

☒ Reported to DWER in writing

Date: 12/04/2022

## 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:	Condition 3.5.1	Date(s) of non-compliance:	31 August 2022
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Details of non-compliance:

The monitoring point HSJ0073M was not monitored in August 2022 for the depth to groundwater (mbgl) requirement as per Table 3.5.1.

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 corresponding reinjection bore HSJ0076P recorded flow, demonstrating that reinjection was occurring. There was no suspected environmental impact from not recording the monthly depth to groundwater reading, the following month reading was 0.1 mbgl different from July, demonstrating no evidence of change in groundwater level.



Cause (or suspected cause) of non-compliance:

A fault with the telemetered data logger.

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

The telemetered data logger was replaced, and data collected for each month following August 2022.

Was this non-compliance previously reported to DWER?

☐ Yes, reported in writing to DWER

☐ 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:	Table 2.4.2	Date(s) of non-compliance:	21 Sep 2022
Details of non-compliance:			
TRH Concentrations from the Licence Point L1, Jimblebar Hub OWWTP exceeded the licence limit of 15 mg/L directly from the outflow line. This is a technical exceedance, as the outflow line discharges into the South Jimblebar turkeys nest (10 ML capacity) and is significantly diluted before being used for dust suppression. Actions to have the sample point changed must be completed, as the exceedance is not accurately reflecting of the water being used for dust suppression.			
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.			
Given the low-level concentrations of heavy metals and TPH/TRH in comparison with the NEPM Guidelines, this material is not considered to pose an unacceptable risk to human health and ecological receptors. As such, no actual or suspected environmental impact is expected to have occurred from this event.			
Cause (or suspected cause) of non-compliance:			
As the concentration of the contaminants of concern are below NEPM guideline limits, there is no actual or suspected environmental impact.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Site Environment Team have collected a sample from South Jimblebar Turkeys nest for TRH analysis to identify if dilution was effective. Water quality confirmed below the licence discharge limit.			
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: 30/01/2023	

**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 3.5.1	Date(s) of non-compliance:	17 April 2023
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**Details of non-compliance:**

Quarterly monitoring of creek line water quality was not completed as required at six monitoring sites by Table 3.5.2. Following a high rainfall event, four creek line monitoring sites (JBSW003, JBSW004, JBSW0010 and JBSW005) were observed to no longer be in place and have been washed away. Monitoring sites JBSW009 and JBSW011 were still in place and a water sample was able to be retrieved from JBSW009 for Q3.

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.

There is no actual or suspected environmental impact from not monitoring four out of the six creek line sites.

**Cause (or suspected cause) of non-compliance:**

A high rainfall event caused four of the six creek line monitoring site equipment to be destroyed and washed away. Over the course of three days from 29 March to 31 March 2023, a total of 108.6 mm of rainfall was received (BoM, Newman Airport).

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

New rising stage sampling stations installed at the six creek monitoring sites during Q1 of FY2024.

**DWER inspection interim outcomes:**

The Licensee is to provide an update on the progress of the investigation in replacing the monitoring stations lost in the storm event. This is to be provided 21 days from the date of the inspection report cover letter.

**Was this non-compliance previously reported to DWER?**

☐ Yes, reported in writing to DWER

☐ 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:	1.2.9	Date(s) of non-compliance:	FY2023
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Details of non-compliance:

The Oreboddy 18 Jimblebar bioremediation facility did not meet the following licence requirements:

- the cell liner does not meet the permeability requirement of  $\leq 10^{-9}$  m/s;
- potentially contaminated stormwater runoff from the treatment cells is not contained within the bioremediation treatment area; and
- the wet cell is lined for a runoff cell and has been used to accept hydrocarbon contaminated waste.

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 Oreboddy 18 bioremediation facility has the following site characteristics which minimise potential environmental risk (as depicted in the figure below):

- Flat/ gently sloping site;
- Located at least 50 m from surface water bodies;
- Separation from the treatment cell/s to groundwater is greater than 3 m; and
- Sufficient distance from potential discharge pathways i.e. drains.

Based on the above site characteristics and site inspection evidence, no known or suspected adverse environmental impact has occurred.



Cause (or suspected cause) of non-compliance:

BHP identified that the bioremediation facility management requires improvement to ensure that hydrocarbon contaminated soils are successfully remediated.

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

BHP has undertaken an investigation into the management of the bioremediation facility and completed improvement works in FY2023 to improve licence compliance. Improvement works include sampling and analysis of contaminated soils and reshaping soil stockpiles to below the height of the facility bunding to ensure potentially contaminated runoff is contained within the facility.

**DWER inspection interim outcomes (22 and 23 May 2023):**

The Licensee is to confirm what actions will be taken to achieve compliance with this condition. The proposed actions are to be provided 21 days from the date of the inspection report cover letter.

The contaminated material near the boundary of the facility is to be moved or reduced in height

## Department of Water and Environmental Regulation

to be below the height of the bunding. Photographic evidence that this has been completed is required to be provided 21 days from the date of the inspection report cover letter.

Was this non-compliance previously reported to DWER?

☒ Yes, reported in writing to DWER


☒ Reported to DWER verbally

Date: 02/08/2023

☒ Reported to DWER in writing

Date: 30/01/2023



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 <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:	31/08/2023	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.