



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 Iron Ore Pty Ltd		
Trading as:	BHP 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:	01/07/2021 to 30/06/2022		

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 – Processing or beneficiation of metallic or non-metallic ore	59.33 Mt
12 – Screening etc. of material	167,513 t
54 – Sewage facility	11.8 m ³ /d
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	24.444 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:	3.3.1	Date(s) of non-compliance:	30 September 2021
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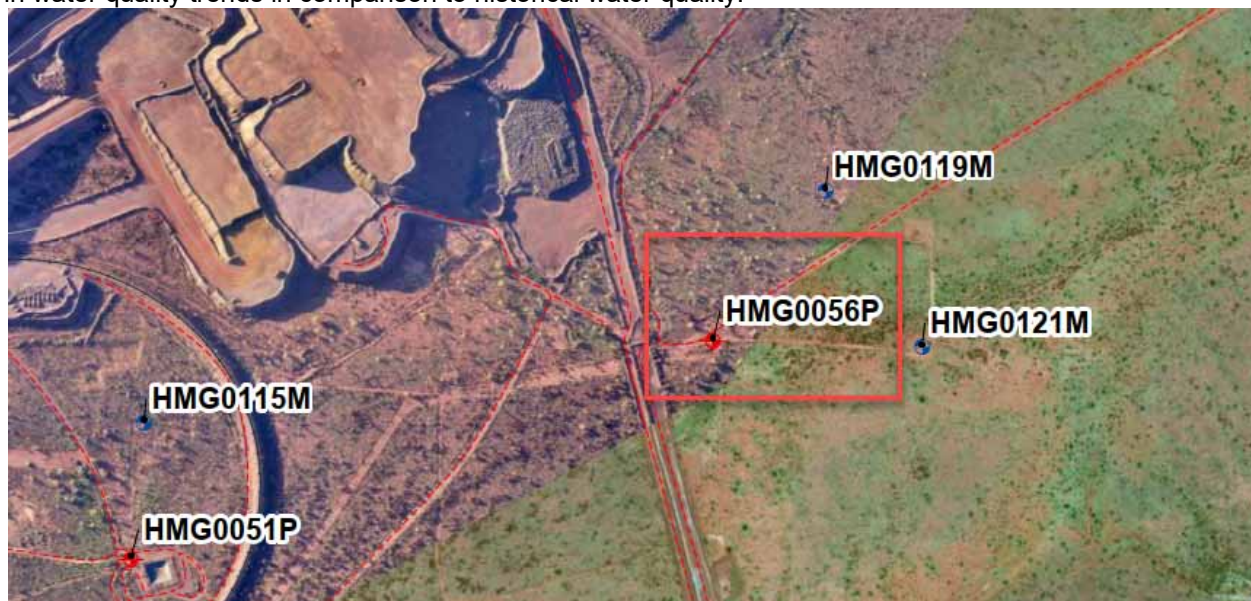
Details of non-compliance:

The reinjection point reference HMG0056P was not monitored in Quarter One, for the groundwater quality parameters required by condition 3.3.1. The bore was required to be sampled quarterly when reinjecting and was operational in July 2021 but not August or September 2021. Approximately 1,300 kL was reinjected during the Quarter One monitoring period. When scheduled to be sampled by the sampling contractor in September 2021 the reinjection valve had been closed and it was communicated that the bore did not require sampling.

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 impact from not sampling during this quarter. The adjacent ambient monitoring bores HMG0119M and HMG0121M were sampled in Q1 and did not report any notable change in water quality trends in comparison to historical water quality.



Cause (or suspected cause) of non-compliance:

A communication error between site and the environmental sampling contractor.

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

A program to sample all bores regardless of reinjection has been implemented and the reinjection water quality was sampled again in the first month of Q2, in October 2021, for immediate comparison with September 2021 ambient groundwater quality results from HMG0119M and HMG0121M.

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:	3.5.1	Date(s) of non-compliance:	30 September 2021, 31 December 2021 and 31 March 2022
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Details of non-compliance:

The monitoring point reference JBGW0080M was not monitored in Quarter One, Two or Three for the groundwater quality parameters required by Condition 3.5.1. JBGW0080M became permanently blocked after the March 2021 monthly standing water level reading had been completed. The quarterly parameter monitoring for Electrical Conductivity, pH and Total Dissolved Solids was unable to be completed in Q1, Q2 and Q3 due to the blockage and an exact water level could not be determined.

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.

For JBGW0080M, a small water volume (13 kL) was reinjected at adjacent HSJ0003P during this period. There was no suspected environmental impact from not monitoring and no impact identified in water quality sampled from alternative bore HSJ0081M.



Cause (or suspected cause) of non-compliance:

Part of the borehole casing for JBGW0080M has collapsed preventing any pumping equipment to pass the blockage.

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

HSJ0081M was selected to be sampled as it is in close proximity (10 m) to JBGW0080M (HSJ0080M) sufficing the same aquifer type, similar depth, and geology. The Licence Amendment was submitted on 7 December 2021 and approved on 17 March 2022 where JBGW0080M (HSJ0080M) was replaced with HSJ0081M.

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:	3.5.1	Date(s) of non-compliance:	30 June 2022
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Details of non-compliance:

The monitoring point reference HMG0121M was not monitored in Quarter Four for the groundwater quality parameters required by condition 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.

For HMG0121M, a small water volume (0.5 kL) was reinjected at adjacent HMG0056P as the bore was not active during this period. There was no suspected environmental impact from not monitoring and adjacent monitoring results from HMG0119M did not report any change in water quality during this sampling period.



Cause (or suspected cause) of non-compliance:

HMG0121M had a small diameter borehole casing and a kink in the casing preventing use of the sampling method.

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

Water quality was collected from HMG0056P and also ambient groundwater bore HMG0119M to identify any changes in water quality as per licence requirements.

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:	3.3.1	Date(s) of non-compliance:	30 June 2022
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Details of non-compliance:

The Licence Amendment granted on 17/03/2022 included a change to the licence not requested by BHP for additional monitoring requirements for three OB18 MAR groundwater monitoring bores - HEOP0828M, HEOP0838M and HEOP0842P. The updated requirements included water quality (including EC and chemical suite analysis) in addition to the existing monitoring requirement of bore depth to groundwater. Following amendment, the three bores (HEOP0828M, HEOP0838M and HEOP0842P) were not internally identified to be a water chemistry sampling requirement until late in the quarter, resulting in a 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.

There was no actual or suspected impact from not sampling during this quarter. The water quality of the three adjacent reinjection bores HEOP0843P, HEOP0845P and HEOP0847P was sampled during this quarter and did not report any notable change in water quality trends in comparison to historical water quality. The three monitoring bores are within 10 metres of reinjection bores and are not representative of either reinjection water quality or ambient water quality conditions.



Cause (or suspected cause) of non-compliance:

BHP was not aware of the change made to the licence conditions with sufficient time for the sampling contractor to complete the additional sampling.

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

HEOP0842M, HEOP0828M and HEOP0838M have been added to the sampling program for FY2023. We note that licence amendment discussions are ongoing regarding BHP's view that reinjection bore quality (HEOP0843P, HEOP0845P and HEOP0847P) is representative of these locations and these monitoring points are superfluous to requirements.

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:	4.2.1	Date(s) of non-compliance:	20 April 2020 – 30 June 2021
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Details of non-compliance:

The Licence Amendment Notice granted on 30/04/2020 incorporated monitoring requirements for three reinjection bores. This included reporting of flow rate, cumulative volumes and water quality in three Ninga MAR injection bores (HEOP0843P, HEOP0845P and HEOP0847P). Condition 3.5.1 of the Environmental Licence (L5415/1988/9) requires that the 'Licensee undertake monitoring in Table 3.3.1 according to the specifications in that table'. Condition 4.2.1 of the Licence states 'the Licensee shall submit to the CEO an Annual Environmental Report by the 1 October each year. The report shall contain the information listed in Table 4.2.1 in the format or form specified in that table'. Following the April 2020 Licence Amendment, the three injection bores (HEOP0843P, HEOP0845P and HEOP0847P) which were required to be reported in the Annual Environmental Report (AER) in 2020 and 2021 were monitored but not reported, resulting in a 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.

There is no environmental impact of not reporting the monitoring data of the three MAR injection bores. The three injection bores have been monitored as required by the Licence, and the analysis results did not indicate any concentrations that would have the potential to impact on the environment.



Cause (or suspected cause) of non-compliance:

The cause of the non-compliance was an administrative error following the April 2020 Licence Amendment.

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

The FY2022 flow rate, reinjection volume and water quality results for the three reinjection bores have been reported in this FY2022 AER, and internal processes are now in place to ensure that reporting occurs in line with the licence conditions in the future.

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 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:		Position:	
Date:		01/09/2021	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.