



Annual Audit Compliance Report

Environmental Protection Act 1986, Part V Division 3

Section A – Licence details			
Licence number:	L5533/1976/11	Licence file number:	FA278067
Licence holder name:	BHP Nickel West Pty Ltd		
Trading as:	BHP Nickel West		
ACN:	004 184 598		
Registered business address:	125 St Georges Terrace PERTH WA 6000		
Reporting period:	01/01/2024 to 30/06/2025		

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
Category 5: Processing or beneficiation of metallic or non-metallic ore 50,000 t or more per year	153,156 t concentrate dried, during Jan 2024 –Jul 2025

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
Category 5: Processing or beneficiation of metallic or non-metallic ore	150,954 t tailing deposited, during Jan 2024 – Jul 2025

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, Table 3	Date(s) of non-compliance:	3/8/2024
---------------	----------------------	----------------------------	----------

Details of non-compliance:

Condition 3: The licence holder must ensure that wastewater from the vehicle washdown areas is not discharged to the leach drain unless the wastewater meets the limits specified in Table 3:

Monitoring conducted on 3 August 2024 indicates that wastewater discharged from the vehicle washdown bay areas did not meet the limits specified in Table 2 of Condition 22 of the Licence. Specifically, the LV washdown bay returned a result of 7mg/L for Surfactants against a limit of 5mg/L, and the SME washdown bay returned a result of pH 4.21 against a limit range of pH 5.5-8.5.

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.

As the discharge was near licence limits and was contained within the site stormwater management system no adverse environmental consequences are anticipated.



Cause (or suspected cause) of non-compliance:

Increased utilization of the washdown bay prior to the transition into temporary suspension, resulted in the introduction of additional volume of particulates and detergent which impacted discharge water quality. Light Vehicle washdown bay additional use resulted in higher detergent load to the separator.

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

Section E – Details of non-compliance with licence condition	
Service oil/water separator to ensure efficient operation Remove current detergent from use and source alternative product Collect samples of washdown bay discharge water to confirm that preventative actions have been effective	
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: 21/8/2024

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:	1.2.c.	Date(s) of non-compliance:	Aug – Dec 2024
---------------	--------	----------------------------	----------------

Details of non-compliance:

Condition 1.2.c: The licence holder must ensure that the site infrastructure and equipment listed in Table 1 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in Table 1.

c) All decant return water from the tailing's storage facility (TSF) must be directed to and contained within the Process Water Dam for optional re-use within the process.

In August 2024, process water was transferred into the stormwater dam.

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 actual environmental impact of receiving decant or process water into stormwater dam (SWD) is believed to be minimal, considering the established water quality of SWD, such that the pH of TSF decant water is higher than that of SWD.



Cause (or suspected cause) of non-compliance:

- There was excess water onsite due to a combination of:
- Operation is in temporary suspension resulting in a significant decrease of water re-use
 - Significant rainfall events in July and August 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.	
Onsite activities requiring high quality Water Corporation water, as opposed to re-use water resulting in additional water being added to the onsite water balance.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<ul style="list-style-type: none"> • Discharge to Stormwater Dam ceased • Trigger Action Response Plan (TARP) updated to identify that discharge into Stormwater Dam as non-compliance which requires immediate escalation • Sitewide water balance review is ongoing to investigate water management options during temporary suspension 	
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:	Condition 1 - Table 1 – Item 3.a	Date(s) of non-compliance:	Suspected since Mar 2023
---------------	----------------------------------	----------------------------	--------------------------

Details of non-compliance:

Condition 1.3.a: The licence holder must ensure that the site infrastructure and equipment listed in Table 1 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in Table 1.

a) A minimum top of embankment freeboard of 300mm must be maintained within TSF's

During an internal audit finalised in January 2025, it was observed that TSF3A freeboard from the top of embankment was less than 300 mm.

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 actual or suspected environmental impact from this non-compliance. The most recent TSF Engineer of Record Annual Audit (report finalised January 2025) identified that there is sufficient stormwater holding capacity within TSF3A to prevent overtopping.



Cause (or suspected cause) of non-compliance:

Section E – Details of non-compliance with licence condition	
<p>The cause of the freeboard non-compliance was incorrect assessment of available freeboard during daily TSF inspections. The tailings material slopes from the perimeter to the central decant, providing sufficient stormwater holding capacity in the centre.</p>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<ul style="list-style-type: none"> • Deposition to TSF3A ceased in March 2023 • Civil work completed and 300mm freeboard re-instated at TSF3A early Aug 2025 	
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:	Condition 2	Date(s) of non-compliance:	29/05/2024
---------------	-------------	----------------------------	------------

Details of non-compliance:

Condition 2: The licence holder must ensure that under normal operation, discharge from the concentrate dryer stacks does not exceed the values specified in Table 2.

On 29th May 2024, monitoring was conducted in accordance with condition 2, and the results of this monitoring were received by NiW on 2 July 2024. The results show particulate concentration results for dryer stack 2 and dryer stack 3 were 410mg/m³ and 370mg/m³, which exceeded the 250mg/m³ limit.

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.

Post exceedance, a desktop analysis of the potential environmental impacts associated with the elevated particulate measurement was undertaken. The analysis looked at impacts to nearby sensitive receptors at the East Kambalda residential area. In all instances the 24-hour average PM10 concentration was analysed against 50µg/m³ (which is considered the guideline value for adverse impacts to sensitive receptors). This guideline value (DWER, 2019) is sourced from the National Environment Protection (Ambient Air Quality) Measure (NEPC, 2016). Desktop analysis result shows the exceedance event is considered unlikely to have caused any adverse or prolonged impacts to applicable sensitive receptors or to have resulted in observable environmental harm.



Cause (or suspected cause) of non-compliance:

The likely cause of the particulate emission exceedance is pump maintenance issues on the scrubber underflow pump.

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

No discernible environmental impact could be determined that required corrective action. Preventative actions are shown below:

- Maintenance inspection of scrubbers return pumps to confirm mechanically operational

Department of Water and Environmental Regulation

<ul style="list-style-type: none">• Spray bar flow and pressure checked• Scrubber cleaning completed on all scrubbers	
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: 3/7/2024

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:	Condition 1 - Table 1 – Item 4c	Date(s) of non-compliance:	Nov 2024 – Jun 2025
---------------	---------------------------------	----------------------------	---------------------

Details of non-compliance:

Condition 1.4.c: The licence holder must ensure that the site infrastructure and equipment listed in Table 1 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in Table 1.

c) Catch pits located at low points, must be maintained and visually inspected biannually, during operational periods, to ensure they contain any spills from along the pipeline routes.

While conducting an internal audit on 14 July 2025, it was identified that the biannual catch pit inspection had not been conducted.

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 actual or suspected environmental impact from this non-compliance. The inspection has since been conducted with no major issues identified. The TSF route is still being inspected daily whilst in temporary suspension. No spill or discharge occurred along the tailings line or catch pit between November 2024 – June 2025.



Cause (or suspected cause) of non-compliance:

During the transition into temporary suspension there was a licence amendment issued in November 2024, with a new requirement to conduct biannual catchpit inspections. This was during the transition into temporary suspension and with the reduction and changeover in personnel there was an oversight of this requirement.

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

Upon identification, a catch pit inspection was immediately conducted and an automated work management task established to ensure it is not missed in the future.

Was this non-compliance previously reported to DWER?

Department of Water and Environmental Regulation

<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date: / /

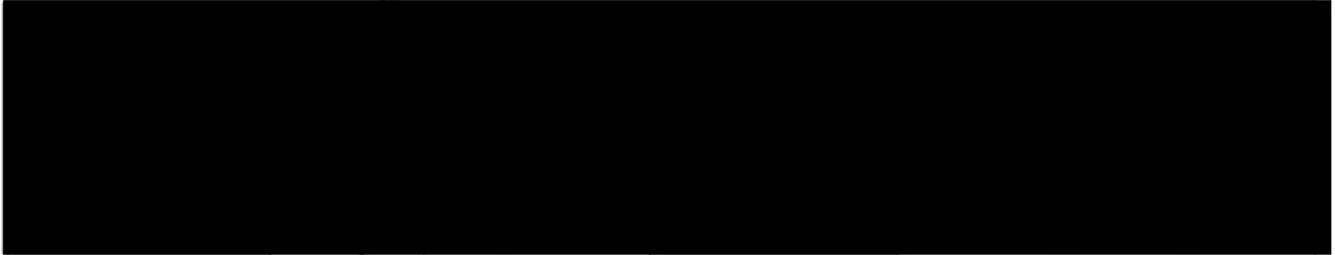
Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.2.a	Date(s) of non-compliance:	11 June 2024
Details of non-compliance:			
<p><i>Condition 1.2.a: The licence holder must ensure that the site infrastructure and equipment listed in Table 1 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in Table 1.</i></p> <p style="margin-left: 20px;">a) <i>The licence holder must maintain a minimum top of embankment freeboard of 300mm for all containment dams.</i></p> <p>On 11 June 2024 post a significant rain event, it was observed that the Kambalda TSF North Decant Pond 300mm freeboard requirement had been exceeded. Water from the Decant Pond pooled around the concrete footing of the pumping infrastructure and adjacent unsealed ground.</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>			
<p>The impacted area is a concreted pump station surrounded by unpaved surface. There is no vegetation in the impacted area. No actual or suspected environmental impact has occurred because of the non-compliance.</p> <p>–</p>			
Cause (or suspected cause) of non-compliance:			

Section E – Details of non-compliance with licence condition	
<p>During temporary suspension the operation is managing stormwater inflow and TSF return water utilising existing storage ponds and evaporation from the TSF surface. Rainfall received resulted in additional inflow into the TSF return pond. Pumping rate increased and TSF return water transferred to the process water pond reinstating the required freeboard.</p>	
<p>Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:</p>	
<p>Upon identifying the event, the decant pump was immediately restarted to transfer water from the pond and return it to site for reuse. The gradient of the surrounding area allows for the natural recovery of the water back into the pond, reinstating the required freeboard.</p>	
<p>Was this non-compliance previously reported to DWER?</p>	
<p><input checked="" type="checkbox"/> Yes, and</p>	
<p><input type="checkbox"/> Reported to DWER verbally</p>	<p>Date: / /</p>
<p><input checked="" type="checkbox"/> Reported to DWER in writing</p>	<p>Date: 24/6/2024</p>

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.



Date:	16/9/25	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.