



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L6453/1990/12	Licence file number:	2011/009443
Licence holder:	BHP Billiton Nickel West Pty Ltd		
Trading as:			
ACN:	004184598		
Registered address:	125 St Georges Terrace PERTH 6000		
Reporting period:	01/01/2019 to 31 /12 /2019		

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 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
Category 5 Processing or beneficiation of metallic or non- metallic ore	Total Ore Treated/Milled - 10,408,346 tonnes
Category 54 Sewage facility	266m ³ per day
Category 57 Used Tyre Storage	Average 46 tyres stored at one time
Category 64 Class II putrescible landfill	2095 tonnes
Category 73 Bulk storage of chemicals	5953m 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
Category 5 Processing or beneficiation of metallic or non-metallic ore	Tailings to TSF - 10,269,741 tonnes

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:	1.3.1. (c)	Date(s) of non-compliance:	7 February 2019
Details of non-compliance:			
<p>Condition 1.3.1. (c) requires the Licensee to ensure that all pipelines containing saline, alkaline or nickel constituents (including but not limited to tailings delivery lines, return water lines and saline water lines) are provided with secondary containment sufficient to contain any spill for a period equal to the time between routine inspections.</p> <p>At approximately 6pm on 7 February 2019, a release occurred of approximately 75kL of tailings material to a previously disturbed area.</p> <p>DWER event reference number ICMS 53053.</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>			
No environmental impact was identified as a result of the event.			
Cause (or suspected cause) of non-compliance:			
A flexible rubber spool failed, resulting in a release of tailings slurry. Given the elevated position of the failure, tailings material was released beyond the designated bund.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The tailings material beyond the designated bunding area was recovered, and returned to the tailings storage facility.</p> <p>A program of routine inspections of rubber expansion joints for deterioration has been implemented.</p>			

Was this non-compliance previously reported to DWER?	
<input type="checkbox"/> No or <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 February 2019

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:	1.3.4	Date(s) of non-compliance:	2019 Reporting Period
Details of non-compliance:			
<p>Condition 1.3.4 requires the Licensee to manage containment cells, dams or ponds in Table 1.3.1 such that a minimum top of embankment freeboard of 300mm or a 1 in 100 year /72 hour storm event (whichever is greater) is maintained.</p> <p>During the reporting period an external operational review was completed on the Mt Keith tailings storage facilities by the engineer of record. A conservative modelling scenario with the assumption of normal decant processes in operation, indicated some areas of the tailings storage facility could overtop if a 1% AEP (72 hour) precipitation event occurred.</p> <p>Note a less conservative modelling scenario, of where normal decant processes are operational, indicated no risk of dam overtopping from precipitation event.</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>No environmental impact occurred.</p>			
Cause (or suspected cause) of non-compliance:			
Administrative non-compliance a result of modelling assumptions applied, where normal decanting processes are assumed not operational.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			

<p>Freeboard identified to be at risk was immediately attended to, and restored to meet the most conservative scenario modelling.</p> <p>The modelling scenario applied does not account for engineered drainage structures inherent to the dam design, such as decant processes, and is therefore considered a worst case scenario. The tailings surface at the time of assessment did not present a dam overtopping risk, when considered against a typical scenario of a 1% AEP 72 hour storm event occurring with decant processes in operation.</p>	
<p>Was this non-compliance previously reported to DWER?</p>	
<p><input checked="" type="checkbox"/> No or <input 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: March 2020</p>


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:	2019 Reporting Period
<p>Details of non-compliance:</p> <p>Condition 2.3.1, Table 2.3.1 requires annual sampling of bores for pH, TDS, selenium, copper, zinc and nickel and quarterly monitoring of standing water levels and record and investigate results that do not meet the specified limits. Condition 3.3.1 requires the Licensee to ensure that breaches of any limit specified in Table 2.3.1 are notified to the CEO as soon as soon as practicable and, in the event of Part A, no later than 5pm the next usual working day.</p> <p>During the required sampling, one bore was found to be below the limit specified in Table 2.3.1, and six bores were unable to have standing water level data obtained:</p> <ul style="list-style-type: none"> • KMB05-50 pH was observed to be below 6 from July 2019 field sampling. Laboratory analysed pH and subsequent monitoring in September 2019 showed pH was within the limit. • KMB12 to KMB14 depth to water data was not obtained for several months due to bore lid not being removable <p>Nickel West became aware of the missing data during preparation of the Nickel West Mount Keith Annual Environment Report 2019.</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>No environmental impact is anticipated due to the missing standing water level data.</p> <p>The failure to immediately report the pH being outside the limit to the CEO, in respect of the Part A information, is an administrative non-compliance with no environmental impact.</p>			

Cause (or suspected cause) of non-compliance:	
<p>KMB12 to KMB14 depth to water data was not obtained for several months due to bore lid not being removable at time of sampling.</p> <p>Temporary and localised fluctuation in bore chemistry at the sample point. Other bores samples in the proximity at the same time did not show elevated acidity.</p> <p>Field non-compliance to the pH limit range was not identified at time of occurrence. Non-compliance detected during preparation of annual report, after which the CEO was notified.</p>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Nickel West will schedule maintenance on bores unable to be correctly sampled, to ensure the caps of these bores are removable during the next monitoring period. No environmental impact is anticipated due to missing sample data.</p>	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> No or <input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: March 2020 – Within AER and AACR for 2020 Reporting Period.

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 Nickel West Northern Operations	Position:	
Date:	27 March 2020	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.