

1 Environmental Management

1.1 Introduction and Purpose

BHP Nickel West Pty Ltd (NiW) owns and operates an integrated nickel mining and processing business across Western Australia. This Annual Environmental Report is prepared by NiW to meet the following reporting requirements:

Table 1-1 NiW Reports Captured

Site	Licence No.	Reporting Obligation	Reporting Period	Report due date
NMK	L6453/1990/12	Annual Environment Report	01/07/2024 - 30/06/2025 (12-month period)	30/09/2025
NMK	L6453/1990/12	Annual Audit Compliance Report	01/07/2024 - 30/06/2025 (12-month period)	30/09/2025
NLN	L4612/1989/11	Annual Environment Report	01/07/2024 - 30/06/2025 (12-month period)	30/09/2025
NLN	L4612/1989/11	Annual Audit Compliance Report	01/07/2024 - 30/06/2025 (12-month period)	30/09/2025
NLN	L6606/1995/9	Biennial Environment Report	01/07/2023 - 30/06/2025 (24 Month Period)	30/09/2025
NLN	L6606/1995/9	Annual Audit Compliance Report	01/07/2024 - 31/07/2025 (12-month period)	30/09/2025
NLN	L9229/2019/1	Annual Audit Compliance Report	01/07/2024 - 30/06/2025 (12-month period)	30/09/2025
NKS	L8653/2012/2	Annual Environment Report	01/07/2024 - 30/06/2025 (12-month period)	30/09/2025
NKS	L8653/2012/2	Annual Audit Compliance Report	01/07/2024 - 30/06/2025 (12-month period)	30/09/2025
NKC	L5533/1976/11	Annual Environment Report	01/01/2024 - 30/06/2025 (18-month period)	30/09/2025
NKC	L5533/1976/11	Annual Audit Compliance Report	01/01/2024 - 30/06/2025 (18-month period)	30/09/2025
NKW	L8437/2010/3	Annual Environment Report	01/07/2024 - 30/06/2025 (12-month period)	30/09/2025
NKW	L8437/2010/3	Annual Audit Compliance Report	01/07/2024 - 30/06/2025 (12-month period)	30/09/2025
NMK	CPS4544/3	Annual Clearing Permit Report	01/07/2024 - 30/06/2025 (12-month period)	31/12/2025
NKW	CPS9105/2	Annual Clearing Permit Report	01/07/2024 - 30/06/2025 (12-month period)	31/12/2025
NLN	CPS9762/2	Annual Clearing Permit Report	01/07/2024 - 30/06/2025 (12-month period)	30/09/2025

NiW has undertaken several licence amendments to align all DWER EP Act Part V reporting requirements to the fiscal period (July to June). For any licences which have recently been amended, the reporting period for this year has been adjusted to account for the scope of the last report submitted. Therefore, several reporting periods for this year are not for a standard 12-month period.

1.2 Nickel West Operations

NiW is a fully integrated mine-to-market nickel business. All nickel operations (mines, concentrators, a smelter and refinery) are located in Western Australia (Map 1-1). Mining, concentrating, smelting and refining activities are located in the northeast Goldfields, Kalgoorlie and Kambalda, Kwinana and Baldiavis. Exploration activities occur regionally throughout the State. The NiW corporate office is located in the Perth Central Business District.

The Mt Keith Operations (NMK) are located approximately 460 kilometres north of Kalgoorlie. The operations comprise of Mt Keith and Mt Keith Satellite open cut mines, waste rock landforms, processing and concentrating facilities, a tailings storage facility, wastewater treatment plant, landfills, water supply borefields, accommodation and associated infrastructure.

The Mt Keith Concentrator produces a nickel concentrate product, which is transported by road to the NiW Leinster Operations for blending and drying. A portion of Mt Keith concentrate is exported via the port of Geraldton to 3rd party

customers. The Mt Keith workforce operates as fly-in-fly-out and is accommodated at the Mt Keith Village located 12 kilometres south of the Mt Keith mining and processing operations.

The Leinster Operations (NLN) are located approximately 12 kilometres north of the town of Leinster. The operations comprise of several nickel deposits with both historic and currently mined pits and underground operations, waste rock landforms, processing and concentrating facilities, drying plant, a tailings storage facility, wastewater treatment plant and landfills. Mining operations at NLN are supported by Leinster town site and ancillary infrastructure including the Leinster airport, power generation, water supply facilities and wastewater treatment infrastructure.

The Cliffs underground mine is located 80 kilometres north of Leinster and immediately south of the Mt Keith Village. Due to similarities in mining method and ore type, Cliffs' ore is delivered to the NLN concentrator, and the site is operated as a satellite mining operation under the overall management of NLN.

The ore mined at Leinster, Cliffs and Camelot (satellite open pit) is processed at the NLN concentrator. The concentrate produced is blended onsite with nickel concentrate from Mt Keith, prior to going through the drier. The final blend is transported via road to Leonora where it is then transported via rail to the Kalgoorlie Nickel Smelter, for further processing.

The NiW Kambalda Concentrator (NKC) is located within the Shire of Coolgardie, 558 kilometres east of Perth and approximately one kilometre northeast of the township of Kambalda East. Nickel concentrate and ore is supplied by third party nickel mines. The operation consists of processing and concentrating facilities, drying plant, a tailings storage facility and associated infrastructure.

The nickel concentrate from NLN, NKC and third-party suppliers is blended and further processed at the NiW Kalgoorlie Smelter (NKS), which uses a flash furnace to smelt concentrate to produce nickel matte. The NKS consists of flash furnace, sulphuric acid plant, oxygen plant, steam turbine, waste slag disposal area and ancillary infrastructure. The nickel matte is transported via rail to the NiW Kwinana Nickel Refinery (NKW) for further processing or sale to overseas markets.

The NKW processes the nickel matte from the smelter into premium-grade nickel powder, briquettes and nickel sulphate for sale to customers.

In July 2024, BHP announced that the NiW operations would be temporarily suspended due to an oversupply in the global nickel market. The NiW operations progressively ramped down and ceased production by November 2024. As such, this AER covers the period during which the NiW operations were ramped down, and the temporary suspension took effect.



Map 1-1 Location Plan of Nickel West Operations

1.3 Environmental Events

NiW has a business wide event management system where employees are required to capture event details. This system ensures that reportable events are managed, recorded, escalated internally and reported to the relevant regulator as required. Where required by a licence condition event details are provided in the relevant section of this report.

2 Nickel West Mt Keith

2.1 L6453/1990/12

BHP Nickel West Pty Ltd (NiW) owns and operates the Mt Keith Nickel Operation (NMK), located 460 kilometres north of Kalgoorlie. The operation comprises of open cut, pits, waste rock landforms, ore processing facility, ore storage, tailings storage facilities, landfills, borefields, wastewater facilities and associated infrastructure.

The NMK Concentrator produces a concentrate product, the majority of which is transported by road to NiW's Leinster Operation (NLN) for blending and drying, prior to transportation to NiW's Kalgoorlie Smelter for further processing and occasional direct export to international markets. Some concentrate from NMK is transported to the Port of Geraldton and shipped to international customers.

This report has been prepared to meet the Condition 24 reporting requirements (covering the period 1 July 2024 to 30 June 2025) for Part V Licence L6453/1990/12.

L6453/1990/12 was amended twice during the reporting period; this report has been prepared to assess and report compliance against all licence conditions that were in effect during the reporting period. Licence conditions referenced throughout this report are referencing the condition number of the most recent licence.

In July 2024, BHP announced that the NiW operations would be temporarily suspended due to an oversupply in the global nickel market. The NiW operations progressively ramped down, with mining at NMK ceasing in September 2024, and production ceasing by November 2024. The mining camp and aerodrome also ceased operation in December 2024, with remaining personnel flying into Leinster (90 kilometres south of NMK) where they are now accommodated and travel via road to NMK.

An Annual Compliance Audit has been performed in accordance with requirements of Condition 21 of L6453/1990/12. There were six non-compliance events identified and these are captured in the attached AACR.

Processing data was significantly reduced from the last reporting period due to the temporary suspension of mining and processing operations.

The production throughputs for NMK for the reporting period are provided in Table 2-1.

Table 2-1 NMK Prescribed Premise Production Throughput

Category number	Category description	Approved premise production or design capacity	Reporting period actual production (Jul 2024 – Jun 2025)
5	Processing or beneficiation of metallic or non-metallic ore	13,500,000 tonnes per annum	4,045,336.27 tonnes
12	Screening etc. of material	1,000,000 tonnes per annum	215,803 tonnes crushed and screened
54	Sewage facility	510 m ³ per day	71.4 m ³ per day
57	Used Tyre Storage	120 tyres	More than 120 tyres were stored at any one time
64	Class II putrescible landfill	7,000 tonnes per annum	1723.01 tonnes
73	Bulk storage of chemicals	13,500 m ³ in aggregate	10,422 m ³ in aggregate (including bulk diesel tank)

L6453/1990/12, Condition 24, Table 8 – Category 64 Throughput

Figure 2-1 displays the distribution of waste types that were disposed at NMK during the reporting period.

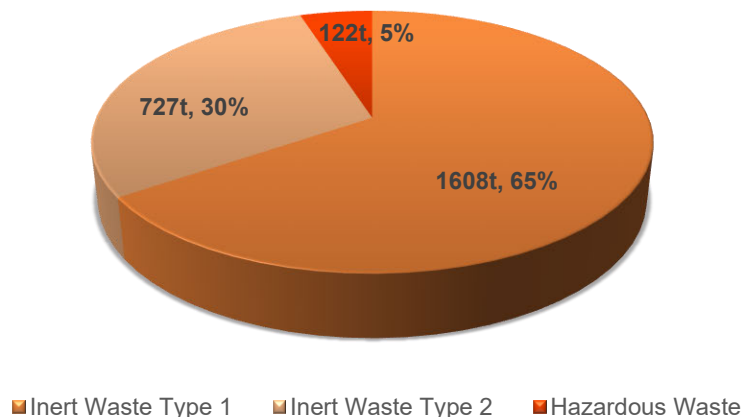


Figure 2-1 NMK Waste Production

L6453/1990/12, Condition 24, Table 8 – Summary of any Malfunction of Pollution Control Equipment and any Environmental Incidents

Table 2-2 summarises the environmental incidents recorded at NMK for the reporting period.

Table 2-2 NMK Environmental Incident Summary

Incident Date	Location	Details	Previously disturbed	Volume (approximate)	Substance
4/03/2025	CDTSF Seepage Intercept Trench	CDTSF- Seepage Intercept- malfunction of seepage recovery infrastructure	Yes	0 L	Process water

L6453/1990/12, Condition 19 – Annual TSF Seepage Risk Assessment

NiW is compliant with the requirement to conduct an annual assessment of the risk associated with the seepage from the tailing’s storage facilities, the assessment conducted in 2025 is provided in Table 2-3. NiW continues to operate the seepage recovery infrastructure (refer to Table 2-4 and Figure 2-4). Potential improvement actions identified during the risk assessment, including extension of the seepage interception trench North, are currently being investigated for implementation.

During 2022 NiW provided DWER details in relation to soil saturation and tree health decline at the Mt Keith Central Discharge Tailings Storage Facility (CDTSF). Following meetings and correspondence between DWER and NiW, NiW committed to actions to further understand water management options at the CDTSF and potential environmental impact associated with the operation of the CDTSF.

NiW has been providing progress updates against the agreed actions to DWER. NiW has submitted to DWER a proposed remediation program designed to mitigate vegetation impacts resulting from the CDTSF (submitted 22 December 2022, updated June 2024). NiW has commenced implementation of the proposed groundwater investigation and monitoring program as well as continuing the existing vegetation monitoring program.

Table 2-3 NMK CDTSF Seepage Risk Assessment 2025

Activity/Task (Description)	Hazard / Aspect (Associated with activity/task)	Risk Event (Unplanned/unwanted event)	Causes (related to risk event)	Material Risk (does this link to a current material risk?)	MFL Impacts			Basis for MFL (Absolute worst case scenario, with no controls in place)	Preventative Controls	Likelihood (based on current effectiveness of preventative controls)	Residual Severity			Residual Severity Factor	RRR	Comments / Further Actions Required
					IM6 Health & Safety	IM7 Environment, Climate Change and Community	IM9 Financial Management				IM6 Health & Safety	IM7 Environment, Climate Change and Community	IM9 Financial Management			
Tailings deposition at Mt Keith CDTSF	Shallow lateral seepage above the Wiluna hardpan	Salinisation causing significant vegetation decline and soil degradation to south and east of CDTSF (TSF2) and/or degradation in water quality.	Waterlogging of vegetation roots. Vegetation intolerance to changes in water quality.	No	1	3	2	Substantial impact to the environment, where recovery of ecosystem function takes between 1 and up to 3 years.	Optimise operational practices to minimise the hydraulic head and seepage; 1. TSF decant recovery pumps operated to keep water levels in the Water Storage Area/ kidney dam as low as possible (as far as is practicable). 2. Minimise standing water in external interception trench by maximising the operation of recovery pumps. 3. Monitoring of the water levels of the decant pond. 4. Daily inspections. (interception trench levels, check recovery pumps are operational) 5. Routine Vegetation and soil monitoring 6. Monitoring Programme (water, soil, vegetation) to identify changes and assess effectiveness of controls	Probable (0.3)	1	3	1	100	30	Action: Explore additional interception trench recovery pumps North of the Decant pumps.
Tailings deposition at Mt Keith CDTSF	Seepage from the CDTSF to the groundwater resource	Degradation/contamination of groundwater resources (i.e. significant salinity impacts to South Lakeway borefield) or soils.	Lateral and vertical seepage	No	1	3	2	MFL based on observed increase in salinity in bore SLW2 (on top of CDTSF) and potential for broader salinity impacts within the borefield if greater drawdown occurs in future (without controls).	1. Monitoring of shallow and deep bores across different stratigraphic units (KMB, WEX, South Lakeway Borefield) and reporting of groundwater levels/quality. 2. Enable WEX bore to allow active GW recovery.	Probable (0.3)	1	3	1	100	30	Likelihood of event occurring has been ranked as probable as monitoring is in place and should provide early identification of any significant changes to the WQ surrounding the CDTSF (and within the SLW borefield) that requires proactive mitigation. Requires further assessment to understand significance of current observed water quality changes. Actions: 1. Complete HGG WQ sampling to understand current salinity levels in western portion of South Lakeway borefield. 2. Review contamination risk assessment based on action 1 results and determine if it triggers a material change to the closure liability (as part of H2 FY24 closure provision review).
Tailings deposition at Mt Keith CDTSF	Seepage from decant water storage area on the eastern side of the CDTSF	Degradation of groundwater resources and/or degradation of vegetation health in the vicinity of the decant water storage area.	1. Lateral and vertical seepage 2. Waterlogging of vegetation roots	No	1	3	2	Substantial impact to the environment, where recovery of ecosystem function takes between 1 and up to 3 years.	Optimise operational practices to minimise the hydraulic head and seepage; 1. TSF decant recovery pumps operated to keep water levels in the Water Storage Area/ kidney dam as low as possible (as far as is practicable). 2. Minimise standing water in external interception trench by maximising the operation of recovery pumps. 3. Monitoring of the water levels of the decant pond. 4. Daily inspections. (interception trench levels, check recovery pumps are operational) 5. Routine Vegetation and soil monitoring 6. Monitoring Programme (water, soil, vegetation) to identify changes and assess effectiveness of controls	Probable (0.3)	1	3	1	100	30	Existing controls effective but subject to continuous improvement.
Tailings deposition at Mt Keith CDTSF	Overtopping incident from the return water pond	Return water discharging to environment	1. Equipment failures and/or failure of the control systems 2. Insufficient freeboard in the return water pond to handle rain water from TSF1 3. Operational errors resulting in loss of freeboard.	No	1	2	1	Release would primarily consist of process water (fresher water from TSF1) resulting in a measurable but limited impact to the environment, where recovery of ecosystem function takes less than 1 year.	1. Process control system (telemetry to control level) (recent improved monitoring response via optical cable installation). 2. Daily inspections of the return water pond. 3. Level control (ability to trend) 4. Dredging to maintain inventory levels in return water pond	Probable (0.3)	1	2	1	30	9	Controls implemented in response to December 2022 event as per s72 notification. Implemented controls effective but subject to continuous improvement.
Tailings deposition at Mt Keith CDTSF	Discharge from the spillway of the decant water storage area (from overfilling)	Return water discharging to environment	1. Very substantial rainfall. 2. Insufficient freeboard	No	1	2	1	Discharge from spillway would primarily consist of rainwater but flow discharged from single point resulting in higher intensity flow compared to sheet flow.	1. Process control system (telemetry to control pumps) 2. Daily inspections of the decant water storage area. 3. Designed storage capacity	Unlikely (0.1)	1	2	1	30	3	Existing controls considered effective. Release from spillway would occur as designed in order to prevent uncontrolled overtopping. Quality of water released to environment would be highly diluted by large rainfall volumes.

L6453/1990/12, Condition 17, Table 6 – Process Monitoring

Process monitoring data required by Condition 17 is provided in Table 2-4 and Figure 2-2 through to Figure 2-8.

In summary:

- Tailings deposition volumes remained relatively consistent throughout the first quarter of the reporting period. Reduced mill output in October was a result of operations being temporarily suspended. From November 2024 the plant was not in operation and no tailings were deposited to the CDTSF.
- Water recovered from the CDTSF remained relatively consistent throughout the first quarter of the reporting period. Reduced recovery from October onwards was a result of operations being temporarily suspended.
- Seepage recovered from the CDTSF remained relatively consistent throughout the first five months of the reporting period. Reduced recovery in December and January was a result of reduced personnel due to temporary suspension. During April and May 2025 there was a mechanical issue with the meter. While water continued to be recovered, volumetric records were not possible. From June 2025 process monitoring has resumed as required.
- Treated wastewater volumes discharged to the CDTSF are dependent on occupancy rates at the NMK Village, which may vary according to site activities, such as shut-down periods when the number of personnel onsite increases. Wastewater throughput was significantly reduced once mining operations were temporarily suspended.
- Water use for processing and dust suppression activities varies throughout the reporting year and is dependent on operating conditions, demand for water within the processing plant, capacity for water storage and mining operations. Dust suppression was significantly reduced once mining operations were temporarily suspended.

Table 2-4 NMK Monthly Process Monitoring Data

Month	Tailings Deposited into TSF (m3)	Water Recovered from TSF (m3)	Seepage Recovered from TSF (m3)	Wastewater Effluent Deposited to TSF (m3)	Cliffs Mine Water to Mt Keith (m3)	Dewatering Volume Used for Dust Suppression (m3)	Water Discharged into J Stage Pit (m3)	Water Discharged into Main Pit (m3)
Jul-24	496,527	755,001	9,319	6,445	23,753	166,900	****	0
Aug-24	805,795	826,000	11,925	5,954	19,906	126,600	****	0
Sep-24	832,366	828,000	9,491	5,611	3,451	88,000	****	0
Oct-24	278,820	439,001	8,619	4,762	***	59,300	****	0
Nov-24	***	394,000	5,766	3,289	***	100	****	0
Dec-24	***	***	*	***	***	***	39,511	0
Jan-25	***	***	*	***	***	***	44,319	0
Feb-25	***	***	4,959	***	***	***	38,835	0
Mar-25	***	***	1,139	***	***	***	28	0
Apr-25	***	***	17**	***	***	***	0	0
May-25	***	***	0**	***	***	***	0	0
Jun-25	***	***	3,080	***	***	***	0	0
Total FY2025	2,413,508	3,242,002	54,315	26,061	47,110	440,900	122,693	0

* Meter not read

** Faulty meter, seepage recovery maintained. Fixed June 2025

*** Mining temporarily suspended at NMK

**** Approval not yet granted to discharge water to J Stage

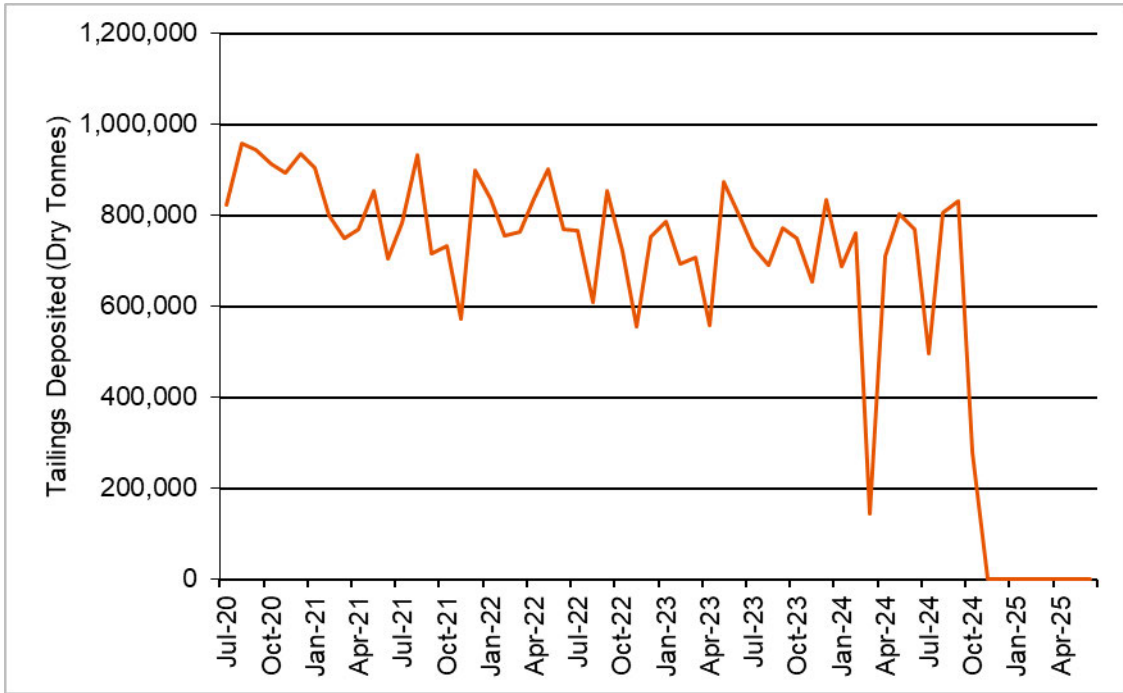


Figure 2-2 NMK CDTSF Tailings Deposition

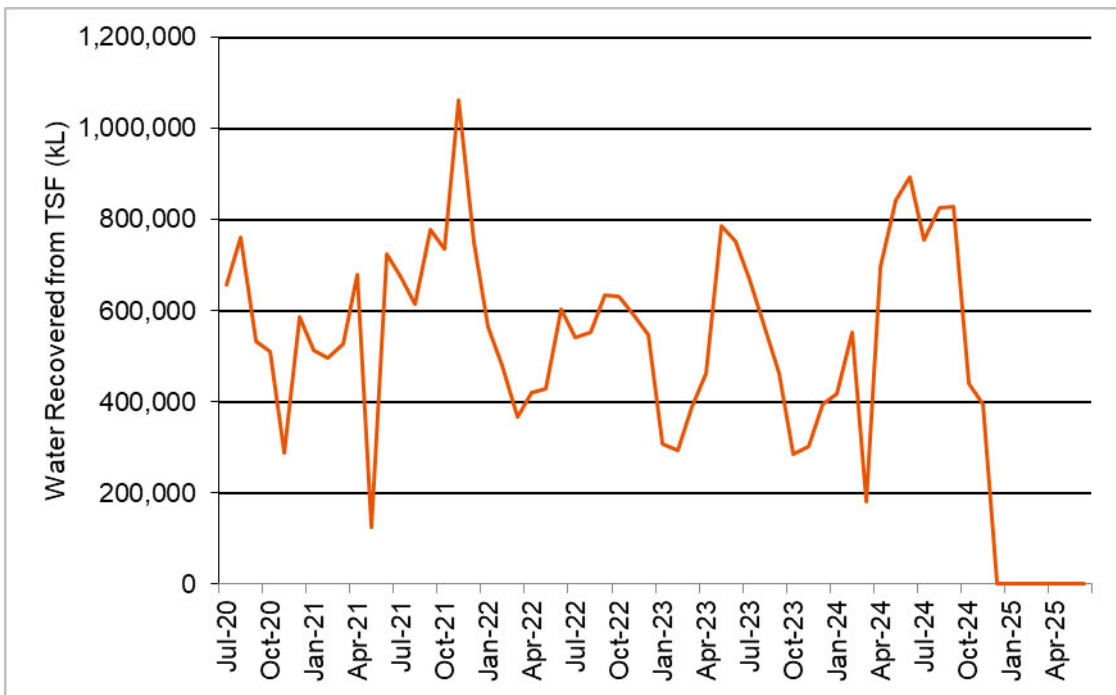


Figure 2-3 NMK CDTSF Water Recovered

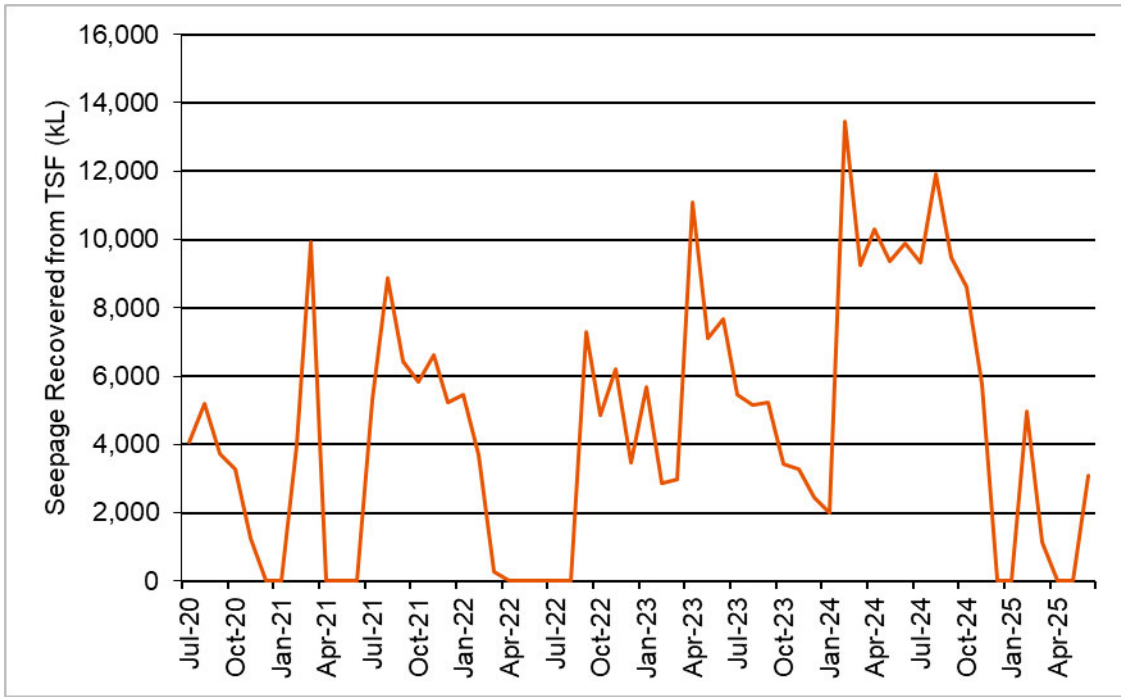


Figure 2-4 NMK CDTSF Interception Trench Seepage Recovered

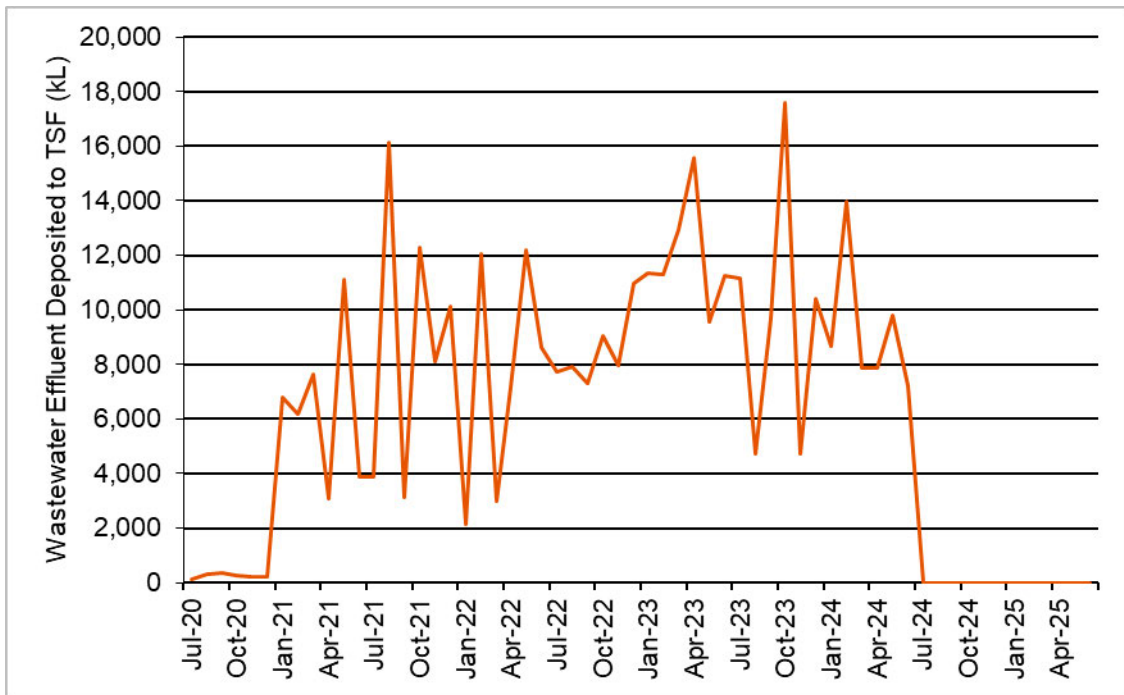


Figure 2-5 NMK CDTSF Wastewater Effluent Deposited

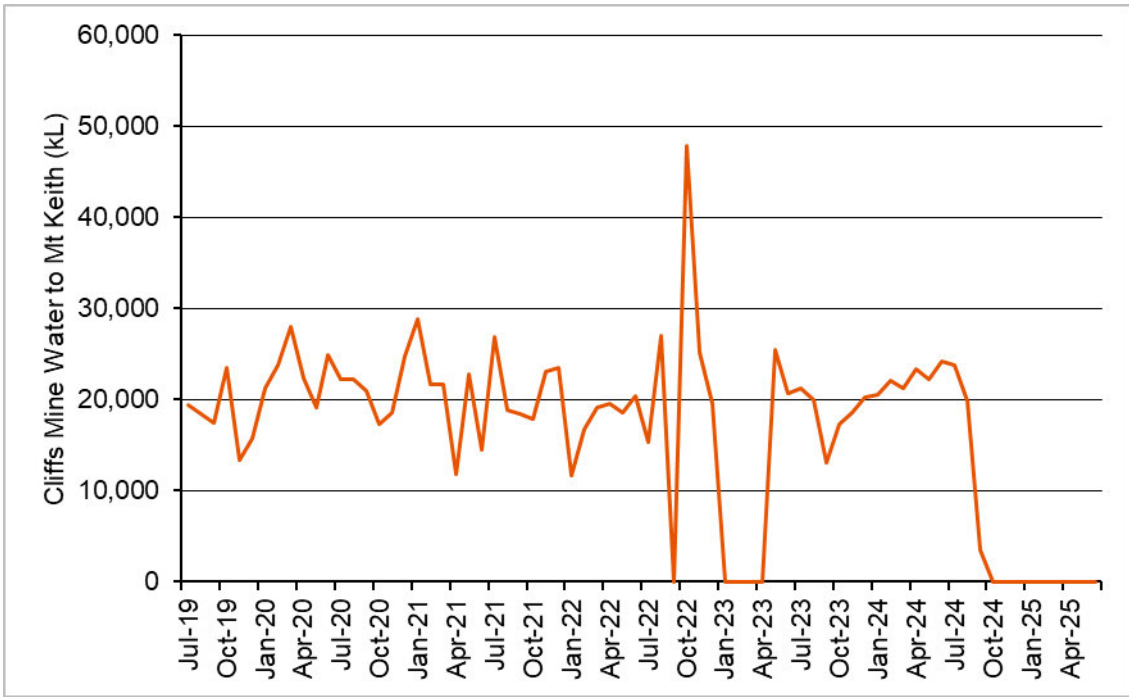


Figure 2-6 NMK Water Received from Cliffs Mine

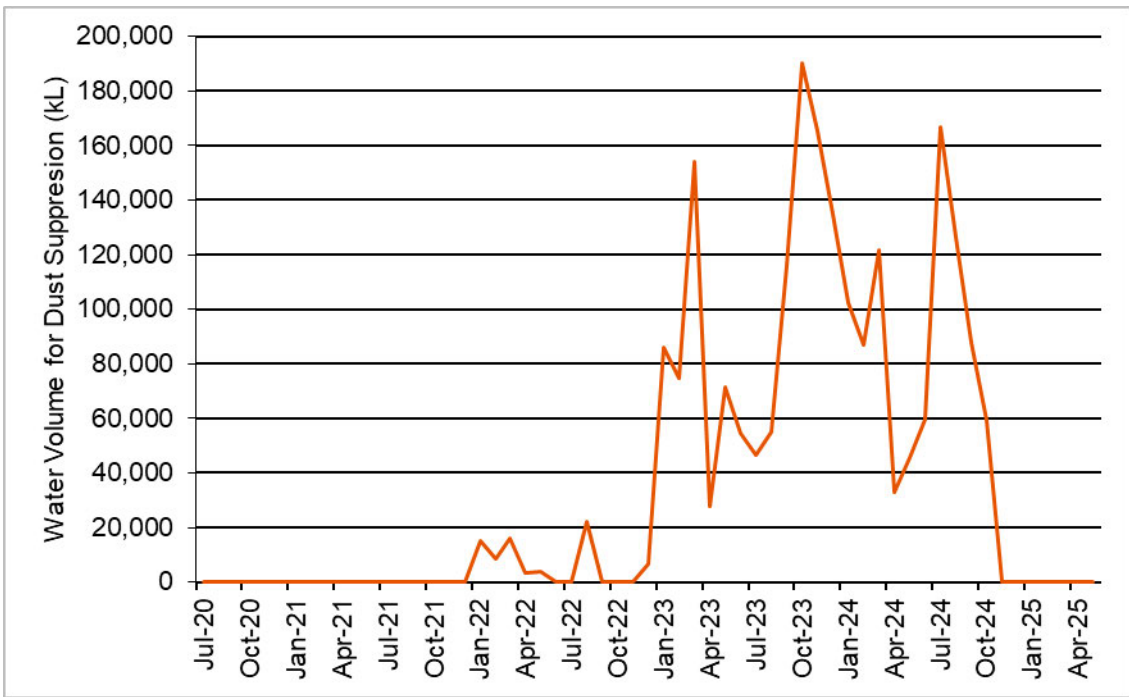


Figure 2-7 NMK Dust Suppression Water Consumption

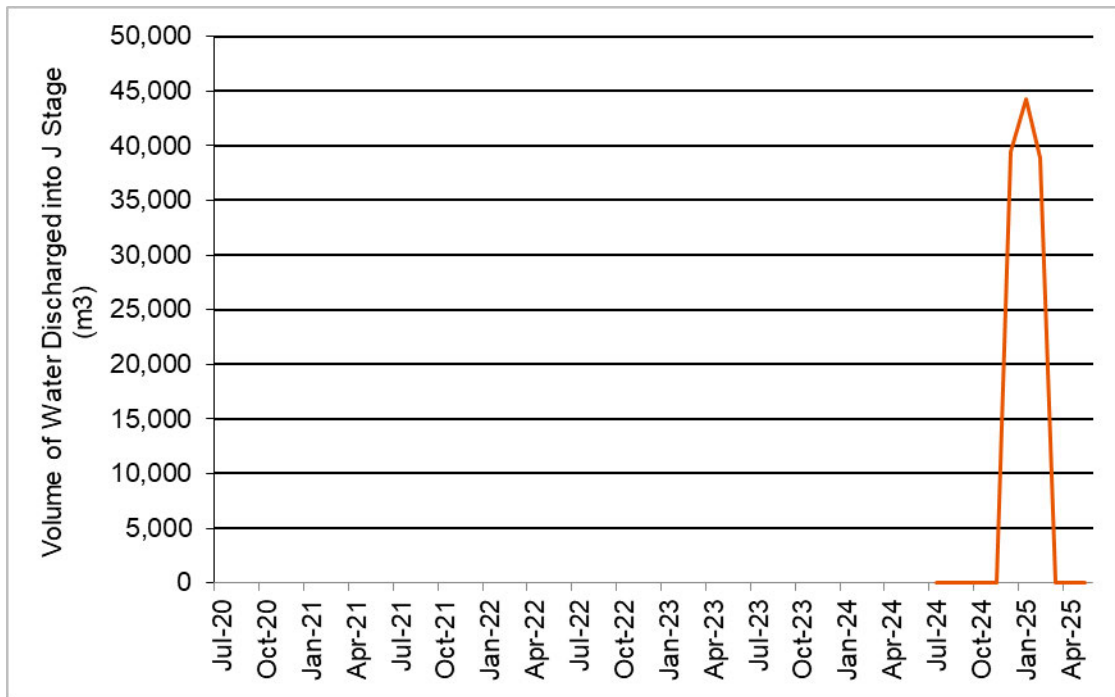


Figure 2-8 NMK J Stage Pit Water Discharge from CDTSF Decant

Water transferred from the CDTSF decant to J Stage or NMK Main Pits, requires a spot sample to be taken at the commencement of each discharge event. As per discharge data captured in Table 2-4, there was no water discharged to the NMK Main Pit however there was water discharged to J stage Pit, Table 2-5 satisfies the spot sampling requirements of L6453/1990/12 condition 17, Table 6.

Table 2-5 NMK CDTSF Decant Water Quality

Location	pH	TDS (mg/L)	As (mg/L)	Cd (mg/L)	Cr (mg/L)	Cu (mg/L)	Ni (mg/L)	Pb (mg/L)	Se (mg/L)	Zn (mg/L)
TSF Decant Pond	8.28	68,800	0.018	<0.001	<0.01	<0.01	0.302	<0.01	<0.1	<0.05

L6453/1990/12, Condition 18, Table 7 – Ambient Groundwater Quality

Groundwater quality monitoring was conducted as per the specifications in Table 7 of L6453/1990/12 to satisfy the requirements of Condition 18.

Monitoring data was collected at all bore locations, at the required frequency for the reporting period. All groundwater results remained within any licence limits.

The groundwater quality monitoring results are generally consistent with previous years. In summary:

- Groundwater quality impacts are best characterised by salinity changes due to the strong contrast between hypersaline TSF seepage and the brackish groundwater in the surrounding groundwater aquifer.
- Water quality is stable owing to rising localised groundwater in the surrounding aquifer.
- There is saline seepage into groundwater aquifers in the immediate vicinity of the TSF; however, this is largely confined to the inside of the outer embankment wall of the CDTSF.

Standing water levels in monitoring bores around the TSFs are affected by the extent, elevation and rate of tailings deposition and the configuration of decant water drains and ponds. There appears to be a trend of generally increasing standing water levels across all bores with some showing artesian conditions, Table 2-6 and Table 2-7. This rise in groundwater levels in bores surrounding both TSF1 and the CDTSF (most recently active facility) is consistent with the trend reported in the 2024 AER. Grouted VWP piezometers show a gradual reduction of artesian conditions around the TSF of 0.9m to June 2025, after deposition ceased in November 2024.

NiW continues to investigate groundwater levels adjacent to the TSFs as part of a holistic approach to seepage management.

Table 2-6 NMK TSF1 Bore Groundwater Quality

Location	Depth to Water (mbgl)				Annual Hydrochemistry					
	Q1	Q2	Q3	Q4	pH Limit 6-9	TDS (mg/L)	Se (mg/L)	Cu (mg/L)	Zn (mg/L)	Ni (mg/L)
KMB03-06	0.96	0.91	0.57	0.69	7.59	3,230	<0.01	0.002	0.006	0.066
KMB03-23	0.49	0.56	0.11	0.05	7.43	1,170	<0.01	0.004	<0.005	0.052
KMB03-61	1	0.94	0.61	0.5	7.32	1,060	<0.01	0.003	0.005	0.073
KMB04-14	4.88	4.77	4.6	4.46	6.91	13,000	<0.01	0.001	0.006	0.616
KMB04-42	4.77	4.68	4.54	5.45	7.08	838	<0.01	0.002	<0.005	0.11
KMB05-25	6	5.95	5.74	5.73	6.59	3,570	<0.01	0.002	0.005	0.032
KMB05-50	5.9	5.9	5.68	6.63	6.45	353	<0.01	0.002	<0.005	0.047
KMB06-13	3.07	3.63	2.49	3.31	7.85	1,310	<0.01	<0.001	<0.005	<0.001
KMB07-25	1.73	1.77	1.58	1.63	7.56	3,820	<0.01	0.005	<0.005	0.002
KMB07-77	1.87	1.72	1.71	1.79	7.87	6,810	<0.01	0.001	0.035	0.1
KMB08D-FY23	-0.913	-0.893	-0.913	-0.913	7.04	15,000	<0.01	0.005	0.134	0.031
KMB08S-FY23	-0.988	-0.938	-0.988	-0.988	6.66	14,300	<0.01	<0.001	<0.005	<0.001
KMB25	8.47	3.37	8.26	0.1	7.32	63	<0.01	<0.001	0.01	0.095
KMB26	7.5	7.41	7.16	7.04	6.7	3,730	<0.01	0.002	0.025	0.063
KMB27	2.61	2.67	2.65	2.26	6.65	5,630	<0.01	0.002	0.147	0.101
KMB32	5.6	6.25	4.87	4.85	7.51	475	<0.01	0.005	0.051	0.023

Note: Bores with negative water levels are artesian and reflect the water level relative to the casing height.

Table 2-7 NMK CDTSF Bore Groundwater Quality

Location	Depth to Water (mbgl)				Annual Hydrochemistry					
	Q1	Q2	Q3	Q4	Field pH	TDS (mg/L)	Se (mg/L)	Cu (mg/L)	Zn (mg/L)	Ni (mg/L)
KMB10D-FY23	0.874	1.074	-0.766	0.374	7.13	2,930	<0.01	0.004	0.042	0.004
KMB10S-FY23	-0.481	-0.471	-0.741	-0.741	7.63	9,620	<0.01	<0.001	<0.005	<0.001
KMB11D-FY23	0.322	0.422	0.202	0.152	7.48	4,560	<0.01	0.005	0.025	0.007
KMB11S-FY23	0.365	0.395	0.075	0.145	7.31	6,660	<0.01	0.002	0.008	0.001
KMB12D-FY23	-0.904	-0.904	-0.904	-0.904	7.02	14,700	<0.01	0.006	0.079	0.004
KMB12S-FY23	-0.925	-0.925	-0.925	-0.925	7.38	3,120	<0.01	0.002	0.036	0.002
KMB13D-FY23	-0.947	-0.947	-0.947	-0.947	7.23	9,220	<0.01	<0.001	<0.005	<0.001
KMB13S-FY23	-0.955	-0.955	-0.955	-0.955	6.95	7,260	<0.01	0.001	0.051	0.002

Location	Depth to Water (mbgl)				Annual Hydrochemistry					
	Q1	Q2	Q3	Q4	Field pH	TDS (mg/L)	Se (mg/L)	Cu (mg/L)	Zn (mg/L)	Ni (mg/L)
KMB14D-FY23	-0.881	-0.881	-0.881	-0.881	7.36	1,020	<0.01	<0.001	0.007	<0.001
KMB14S-FY23	-0.898	-0.898	-0.898	-0.898	7.14	1,140	<0.01	<0.001	0.024	0.001
KMB15-33	2.30	1.93	2.21	2.35	7.83	1,890	<0.01	0.008	0.018	0.031
KMB15-70	6.20	5.77	5.98	5.45	8.39	1,190	<0.01	0.007	<0.005	0.003
KMB16D-FY23	1.564	1.304	1.214	1.374	7.82	1,540	<0.01	<0.001	<0.005	0.001
KMB16S-FY23	1.073	1.073	1.873	1.103	7.63	1,480	<0.01	<0.001	<0.005	0.001
KMB17D-FY23	1.372	1.222	1.072	1.072	7.96	2,060	<0.01	0.002	0.013	0.002
KMB17S-FY23	1.285	1.105	1.085	1.085	7.44	1,740	<0.01	<0.001	<0.005	0.001
KMB18D-FY23	0.743	0.773	0.553	0.733	7.17	13,900	<0.01	0.023	0.141	0.012
KMB18S-FY23	0.747	0.687	0.517	0.637	7.80	4,310	<0.01	<0.001	<0.005	0.003

Note: Bores with negative water levels are artesian and reflect the water level relative to the casing height.

The following factors are to be considered regarding standing water levels around the TSFs:

- Investigations completed to date suggest that since deposition into the CDTSF ceased (due to temporary suspension) that there has been a decrease in the hydraulic pressure in the general area.
- Bores that are sub-artesian have stabilized. With evidence to suggest a slight downward trend in water levels.
- The 2023 KMB bore replacement program installed new monitoring points that can contain artesian water pressure and enable measuring the pressure using gauges at the bore headworks. Trends from the 2025 reporting period are similar across the facility with shallower bores generally showing higher pressures than their accompanying deeper bores.
- In FY25, 4 of the WEX abstraction bores were equipped with abstraction pumps, with commissioning and testing currently underway. Following testing, all bores are expected to be online and pumping from approximately November 2025. Operation of these bores aims to test response of water recovery in the southern sector of the CDTSF to understand whether the bore network is effective in reducing water pressure in the area.
- No significant change in water quality, has been seen in bores outside the facility.

Table 2-8 NMK TSF1 Bore Arsenic Data

Location	Arsenic (As) (mg/L)			
	Q1	Q2	Q3	Q4
KMB03-06	0.002	0.001	0.002	<0.001
KMB03-23	0.001	0.001	<0.001	<0.001
KMB03-61	<0.001	<0.001	<0.001	<0.001
KMB04-14	0.001	<0.001	<0.001	<0.001
KMB04-42	<0.001	<0.001	<0.001	<0.001
KMB05-25	<0.001	0.002	0.002	<0.001
KMB05-50	<0.001	0.001	0.001	0.002

Arsenic concentrations remain relatively consistent (Table 2-8), with all results below 0.002 mg/L and most results below laboratory detection limits.

Table 2-9 NMK Stock Bore Groundwater Quality

Bore	pH	TDS (mg/L)	Cu (mg/L)	Ni (mg/L)	Se (mg/L)	Zn (mg/L)
Licence Limit	6.0-9.0	6,000	0.5	1	0.02	20
Two Tanks Well	7.32	1,140	0.002	0.002	<0.01	<0.005
Howards Well	Dry – no sample					

All monitored parameters for the stock water bores (Table 2-9) remained within the required licence limits. No analysis results were available for Howards Well as this bore was dry throughout the reporting period.

Water quality for Two Tanks Well remains within historical range, brackish with very low or undetectable trace elements.

Table 2-10 NMK Tailings Decant Pond Water Quality

Location	pH	TDS (mg/L)	As (mg/L)	Cd (mg/L)	Cr (mg/L)	Cu (mg/L)	Ni (mg/L)	Pb (mg/L)	Se (mg/L)	Zn (mg/L)
TSF Decant Pond	8.28	40,400	0.025	<0.001	<0.01	<0.01	0.292	<0.01	<0.1	<0.05

Water quality at the tailings decant pond (Table 2-10) exhibited readings above the limit of reporting (LOR) for nickel and arsenic. TDS readings are the result of the hypersaline water used in processing and residues of soluble nickel result from the nickel flotation process.

In compliance with the licence amendment to allow for discharge of excess stormwater from the water storage area of the CDTSF to the J Stage open cut pit, additional quarterly monitoring commenced in January 2025 (Table 2-11). Monitoring bores MKRC725 and MRCK731 were added to the quarterly groundwater schedule to monitor ground water around J pit.

Table 2-11 NMK J Stage Pit Bore Groundwater Quality

Bore ID	Date	SWL (mbgl)	pH	TDS (mg/l)
MKRC725	Q1 - July 24	*	*	*
	Q2 - Oct 24	*	*	*
	Q3 - Jan 25	39.82	7.79	2,102
	Q4 - May 25	40.2	7.02	528
MKRC731	Q1 - July 24	*	*	*
	Q2 - Oct 24	*	*	*
	Q3 - Jan 25	55.66	7.7	2,430
	Q4 - May 25	54.43	6.73	1,407

*Prior to licence amendment requiring sampling

L6453/1990/12, Condition 20 – Complaints Summary

There were no formal complaints received by NiW in respect of NMK during the reporting period.

L6453/1990/12, Condition 21 – Annual Audit Compliance Report

In accordance with Condition 21, the Annual Audit Compliance Report is provided below.



Annual Audit Compliance Report

Environmental Protection Act 1986, Part V Division 3

Section A – Licence details			
Licence number:	L6453/1990/12	Licence file number:	2011/009443-1
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:	01/07/2024 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	4,045,336.27 t
Category 12: Screening etc. of material	215,803 t
Category 57: Used Tyre Storage	More than 120 tyres were stored at any one time
Category 73: Bulk storage of chemicals	10,422 m ³

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 64: Class II putrescible landfill	1.723.1 t
Category 54: Sewage facility	71.4 m ³ average 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:	1	Date(s) of non-compliance:	28/11/2024
Details of non-compliance:			
<p><i>Condition 1: 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><i>Return Water Pond - Lined with HDPE material with a permeability of <10⁻⁹ m/s or equivalent.</i></p> <p>While reducing the water level at the Return Water Pond (RWP) it was observed that the liner had deteriorated along sections of the perimeter walls and was torn in some areas below water level.</p>			
<p>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.</p>			
<p>No actual or suspected environmental impact from this non-compliance. Return Water Pond level reduced and maintained below damaged section of liner preventing discharge of water to the environment.</p>			
Cause (or suspected cause) of non-compliance:			
<p>While reducing water levels in the RWP it is assumed the weight of accumulated solid material within the pond may have caused the liner to deteriorate and tear. The damage to the liner occurred where the liner has been exposed to extended periods of ultraviolet radiation from the sun.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The water level in the RWP was further reduced to maintain levels below the damaged section. A contractor was engaged, and the liner has been repaired.</p>			
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:	6	Date(s) of non-compliance:	04/03/2025
Details of non-compliance:			
<p><i>Condition 6: The Licence Holder must manage the TSF's such that:</i> (a) A seepage collection system and recovery system is provided and used to capture seepage from the TSF; and (b) Seepage is returned to the TSF or re-used in processing.</p> <p>The seepage recovery system on the downstream toe of the NMK CDTSF water storage area malfunctioned. Water pooled in the toe drain and onto the perimeter road.</p>			
<p>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.</p>			
<p>No actual or suspected environmental impact from this non-compliance. Seepage recovery pump returned to service and the water pumped into the CDTSF water storage area.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The transition into temporary suspension resulted in scheduled maintenance of pumping infrastructure not being completed.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>An investigation was undertaken to identify any issue with the pumping infrastructure, and maintenance was actioned. Scheduled maintenance processes have been reestablished. Pumping infrastructure returned to service and accumulated water in toe drain returned to CDTSF water storage area.</p>			
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:	12	Date(s) of non-compliance:	28/02/2025
Details of non-compliance:			
<p><i>Condition 12: The Licence Holder must:</i></p> <p><i>(a) undertake inspections as detailed in Table 5.</i></p> <p><i>(b) where any inspection identifies that an appropriate level of environmental protection is not being maintained, take corrective action to mitigate adverse environmental consequences as soon as practicable; and</i></p> <p><i>(c) maintain a record of all inspections undertaken.</i></p> <p>During the annual audit, it was identified that suitable records had not been maintained to verify that the inspections had occurred.</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>			
No actual or suspected environmental impacts from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
During the transition into temporary suspension, scheduled inspections were incomplete or omitted due to poor communication and the cessation of tailings deposition.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Investigations commenced to identify the cause. Planned maintenance work orders established to formalise process for scheduled inspections.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
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	Date(s) of non-compliance:	14/05/2025
Details of non-compliance:			
<p><i>Condition 1: 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><i>Tyre disposal cell - Used tyre storage limited to no more than 120 tyres at any one time.</i></p> <p>Approximately 400 used tyres were being stored at NMK</p>			
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 impacts from this non-compliance			
Cause (or suspected cause) of non-compliance:			
Poor communication of the requirement to regularly dispose of used tyres.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
NiW team progressing burial of used tyres within waste rock landform. Mining has ceased during temporary suspension and limited quantity of waste tyres to be generated.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
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:	11	Date(s) of non-compliance:	23/05/2025
Details of non-compliance:			
<p><i>Condition 11: The Licence Holder must:</i></p> <p>(a) not store more than 6,225 kL of diesel in the bulk diesel storage tank at any time.</p> <p>(b) maintain a compound at the bulk diesel storage, designed to contain at least 6,847.5 kL.</p> <p>(c) maintain the level alarms which will be triggered at 15% and 67% of the maximum capacity of the bulk diesel storage tank; and</p> <p>(d) measure the bulk diesel storage tank volume daily (now weekly) and maintain a logbook to record the measurements.</p> <p>During the annual audit, it was identified that suitable records had not been maintained to verify that the daily measurements had occurred.</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 actual or suspected environmental impacts from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Following the transition into temporary suspension, scheduled tank level measurements were incomplete or omitted due to poor communication of the requirement.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
L6453/1990/12 was amended to weekly volume checks of the bulk diesel tank and this requirement communicated to the warehouse team. This aligns with NiW's strategy during temporary suspension to maintain lower tank levels.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
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:	17 (Table 6)	Date(s) of non-compliance:	29/01/2025
Details of non-compliance:			
<p><i>Condition 17: The Licence Holder must undertake the monitoring in Table 6 according to the specifications in that table.</i></p> <p>The volumes of seepage recovered was not recorded on a monthly basis</p>			
<p>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.</p>			
No actual or suspected environmental impact from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
During the transition into temporary suspension there were two months identified where the flow meter was not recorded.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Investigations commenced to identify the cause. Planned maintenance work orders established to ensure flow meter monitoring occurs. The flow meter is cumulative and the total volume of seepage water recovery has been measured and recorded.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
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.



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.