



## Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

### Section A – Licence details

Licence number:	L7851/2002/6	Licence file number:	DER2013/000925
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:	01/07/2023 to 30/06/2024		

### 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 nonmetallic ore	125,741,661 t
12 – Screening	1,83,000 t
52 – Power Station	0.259 MW
54 – Sewage facility	314.75 m <sup>3</sup> average per day
63 – Class 1 inert landfill site	5,857.96 t per annual period
73 – Bulk storage of chemicals etc.	7,140 m <sup>3</sup> in aggregate
89 – Putrescible landfill site	2,435 t in the reporting period

### 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	14,425,795 t
85B – Water desalination plant	0.16 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:	Condition 21, Table 12	Date(s) of non-compliance:	July 2023 to June 2024
Details of non-compliance:			
BHP identified the sump built to contain washdown water at the FEM (Field Equipment Maintenance) Workshop does not adequately capture potentially contaminated (hydrocarbon) water.			
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.			
Localised hydrocarbon surface staining around washdown areas due to sump blockages not capturing water.			
Cause (or suspected cause) of non-compliance:			
Overtopping of the washdown facility sump and washdown of vehicles off the designated washdown area.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The frequency of the scheduled sump clean-outs has increased and hydrocarbon-stained soil has been removed. BHP will continue to investigate management of this facility in FY2025.			
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: 30/09/2023 (AER FY2023)	

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 26, Table 14	Date(s) of non-compliance:	July 2023 to June 2024
Details of non-compliance:			
The licence requires the continuous monitoring of the discharge volumes for L1 (Packsaddle Village WWTP ponds) and the calculation of a monthly average discharge volume. Whilst continuous monitoring via flowmeters was in place throughout the reporting period, the data was found to be erroneous and unable to be relied upon for the reporting purposes, causing inability to calculate accurate monthly averages (m <sup>3</sup> /day) within the FY2024 reporting period for L1 (Packsaddle Village WWTP ponds).			
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.			
The inability to calculate monthly average values is considered administrative in nature and no known or suspected environmental impact has occurred as a result of this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Technical issue relating to flow meter installation and configuration leading to inaccurate data measurements.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Flow meter software settings reconfigured and installation of blanks in pipeline to increase flow height reflecting OEM (Original Equipment Manufacturer) installation guidelines. Verification of data accuracy will be complete in Q1 FY2025.			
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: 30/09/2023 (AER FY2023)	

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 26, Table 14	Date(s) of non-compliance:	July 2023 to September 2023
Details of non-compliance:			
A non-compliance related to quarterly Biochemical Oxygen Demand (BOD) data collection was identified for L1 and L2 for FY2024 Q1.			
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.			
No known or suspected environmental impact has occurred as a result of this non-compliance. Although there are gaps in the data collection for these sampling points, BHP considers that these have not impacted the environment, with consistent results being visible in the available data for other quarters. This non-compliance is administrative in nature.			
Cause (or suspected cause) of non-compliance:			
Due to delays in analysis, sample was not analyzed within holding time.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monitoring requirement reinforced to the responsible party. All subsequent monitoring events undertaken in accordance with the condition requirements.			
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 10	Date(s) of non-compliance:	July 2023 to June 2024
Details of non-compliance:			
As previously reported, in 2022 BHP identified that the MAC Auxiliary Workshop WWTP irrigation area had been eroded by stormwater runoff from the adjacent Auxiliary Workshop carpark apron. As a result, treated effluent (wastewater) was discharging into the site drainage system.			
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.			
No known or suspected environmental impact has occurred as a result of this non-compliance as it is a treated effluent.			
			
Cause (or suspected cause) of non-compliance:			
Stormwater runoff from adjacent Auxiliary Workshop carpark had eroded the irrigation area bund and damaged irrigation area pipework.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A review of the management and conditions of the WWTP was undertaken and improvement project will be in place in FY2025.			
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: 30/09/2023 (AER FY2023)	

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 6 and 7	Date(s) of non-compliance:	July 2023 to June 2024
Details of non-compliance:			
BHP identified that a significant volume of cardboard, wooden pallets, office furniture and hydrocarbon contaminated waste (drained oil filters) have been stockpiled in the inert waste area at the site landfill site.			
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.			
As the landfill is fenced and groundwater is greater than 2 m from the base of the landfill, no known or suspected environmental impact has occurred.			
Cause (or suspected cause) of non-compliance:			
Inadequate signage outlining the waste types accepted at the landfill and appropriate disposal locations within the landfill areas.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
BHP is progressing improvement works for the inert waste including adequate signage outlining waste types at the source, raising awareness and segregation of the waste which will continue in FY2025.			
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: 30/09/2023 (AER FY2023)	

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 11	Date(s) of non-compliance:	July 2023 to June 2024
Details of non-compliance:			
Containment infrastructure is required to achieve a liner permeability requirement of $<10^{-9}$ m/s.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>The Mining Area C bioremediation area has the following site characteristics to minimise potential risk to the environment:</p> <ul style="list-style-type: none"> <li>• Flat/gently sloping site within the A-Deposit Waste Rock Dump;</li> <li>• At least 50 m from surface water bodies;</li> <li>• Separation from the treatment cell to groundwater is greater than 3 m (situated at approximately 641 mRL);</li> <li>• Sufficient distance from potential discharge pathways i.e. drains.</li> </ul> <p>Localised contamination may have occurred from seepage through the dry and wet cell liner and potentially contaminated stormwater runoff, however, based on the above site characteristics and site inspection evidence, no known or suspected environmental impact has occurred.</p>			
Cause (or suspected cause) of non-compliance:			
BHP submitted a Part V licence amendment report (circa 2016), where the location and reference to bioremediation facilities was removed from the licence. This was based on advice from DWER, that hydrocarbon impacted soils can be temporarily stored whilst they undergo bioremediation before clean remediated soil is relocated to waste rock dump areas. BHP identified that remediation of hydrocarbon contaminated soil at the A-Deposit Bioremediation facility was not occurring within expected remediation timeframes and the bioremediation facility does not meet design specifications.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
BHP is currently revisiting the management of hydrocarbon contaminated soil and is developing a consistent approach to the management of bioremediation across WAIO. The current non-compliance (dry cell issue) at MAC will be addressed by this Landfarm Compliance project.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input type="checkbox"/> Reported to DWER in writing		Date: 30/09/2023 (AER FY2023)	



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 5 Table 4	Date(s) of non-compliance:	1 November 2023
Details of non-compliance:			
Tyres were not stored/disposed of in piles of up to 100 units with a 6 m separation distance between piles.			
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.			
No known or suspected environmental impact has occurred.			
Cause (or suspected cause) of non-compliance:			
Incorrect management of scarp tyres.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Training and education was provided to the relevant area managers in order to prevent recurrence of this non-compliance.			
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 25 Table 13	Date(s) of non-compliance:	June 2023 – July 2024
Details of non-compliance:			
No accurate monthly water level reading for HGSL0028M for FY2024.			
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.			
Cause (or suspected cause) of non-compliance:			
BHP identified that the incorrect bore has been dipped throughout FY2024. Water level data in FY24 was collected from HGSL0029M, which is located adjacent to HGSL0028M. Bore was not adequately labelled.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
BHP reviewed the bore logs and identified that data from HGSL0029M is representative of the aquifer response to injection at HSGL0032M. Manual dip completed at correct HSGL0028M for August 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 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:	26/09/2024	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.