



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

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:	01/07/2020 to 30/06/2021		

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	64,462,931 t
12 – screening	533,552 t
52 – Power Station	6,728 MWh
54 – sewage facility	1,310 m ³ average per day
63 – class 1 inert landfill site	7,485.8 t
73 – bulk storage of chemicals etc.	2,470 m ³ in aggregate
89 – putrescible landfill site	1,396.45 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	18,649,626 t
85B – Water desalination plant	0.13 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:	1.2.11	Date(s) of non-compliance:	14/06/2021
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Details of non-compliance:

During a clearing activity of reeds in a containment pond, the liner was breached causing loss of containment fluid from an oily water separator unit at the MAC Power Station.

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 adverse impact on the environment occurred as a result of the discharge. Monitoring of discharged material returned Total Recoverable Hydrocarbon (TRH) results below the Licence threshold of 15 mg/L (consistent with discharge requirements for the location as set out in Condition 2.3.2).



Cause (or suspected cause) of non-compliance:

Liner was breached by the use of excavation equipment to clear the ponds of reeds.

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

Water was immediately vacuum trucked out and subsequently pumped to the bioremediation facility, pending results of the TRH analysis. The liner has been repaired and the oily water separator at the Power Station was currently on a 2-day vacuum truck work order while repairs were undertaken.

Was this non-compliance previously reported to DWER?

No

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:	1.2.2	Date(s) of non-compliance:	Over the reporting period
Details of non-compliance:			
The daily average limit (annualised) for the acceptance of sewage into the sewage treatment plants exceeded the 1,110 m ³ capacity by 200 m ³ per day as prescribed in category 54 of the Licence.			
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 known actual or suspected environmental impacts were observed based on quarterly monitoring of nutrient content and no overtopping of the WWTPs.			
Cause (or suspected cause) of non-compliance:			
Increased personnel using facilities due to South Flank construction works.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
After an investigation, BHP has identified the need to upgrade the Packsaddle WWTP as the infrastructure design and licenced capacity does not adequately account for increased throughput resulting from construction activities. A project is currently underway to ensure the WWTP can be repaired and maintained to ensure compliance.			
Was this non-compliance previously reported to DWER?			
Yes			
<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:	3.2.1	Date(s) of non-compliance:	April 2021
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Details of non-compliance:

Emission Point references were not monitored for pH and electrical conductivity at HGSL0005 during the month of April 2021.

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 known actual or suspected adverse impact on the environment as a result of the missed sampling based on the interpolation of results obtained in the preceding and following months.



Cause (or suspected cause) of non-compliance:

An error occurred when downloading the data from the telemetry equipment.

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

Due to the missed sample resulting from human error, no actions were taken to prevent further non-compliance.

Was this non-compliance previously reported to DWER?

No

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:	31/01/2021
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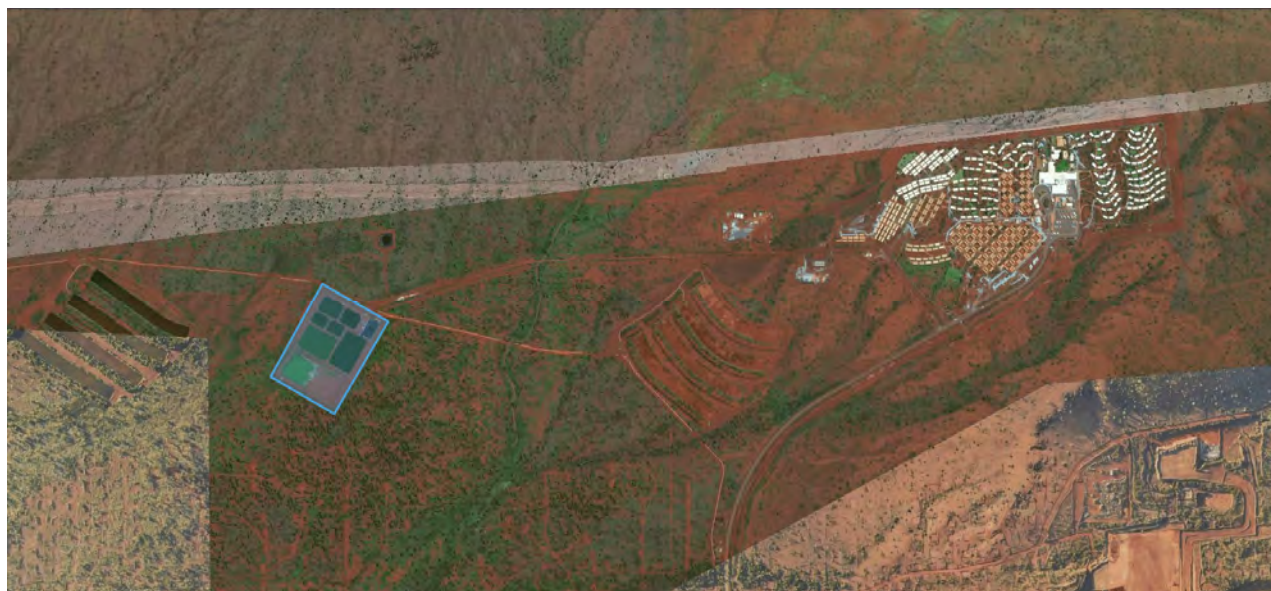
Details of non-compliance:

Quarterly missed sample of Total Phosphorus and Total Suspended Solids at the Packsaddle Waste Water Treatment Plant (NPIPCEMSEW020 and NPIPCEMSEW011) in Quarter 3 (January – March 2021).

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 known actual or suspected adverse impact on the environment as the discharge is flowing into a licensed discharge pond that was made for the purpose of collecting treated effluent and allowing it to infiltrate into the ground.



Cause (or suspected cause) of non-compliance:

Error in laboratory analysis was not identified and rectified in a timely manner, and the missed analytes were not able to be completed as scheduled.

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

Investigation was completed by contractor in charge of monitoring and corrective actions to ensure improvement around Chain of Custody documentation. HSE Environment team are reviewing data in a timelier manner to pick up on discrepancies which can be closed out before the end of the quarter.

Was this non-compliance previously reported to DWER?

No

<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:	3.3.1	Date(s) of non-compliance:	Quarter 2 2021
Details of non-compliance:			
Quarterly missed sample of TRH at the newly constructed South Flank Oil Water Separator retention pond.			
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 known actual or suspected adverse impact on the environment as the OWS was newly commissioned and the discharge was sampled in the following quarter and found to be below the limit of reporting (<0.01 mg/L).			
Cause (or suspected cause) of non-compliance:			
Communication breakdown between construction teams and operational teams in ensuring the emission point was effectively and sustainably added to monitoring register and associated checklists.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The emission point has been added to the monitoring register and run sheets, and subsequently verified.			
Was this non-compliance previously reported to DWER?			
No			
<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:	3.3.1	Date(s) of non-compliance:	Quarter 3 2021
Details of non-compliance:			
Access issue at “A Deposit Turkey’s Nest” at the time of the Q3 discharge monitoring event meant a representative sample was unable to be taken of the water being discharged at the central sediment basin.			
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 known actual or suspected adverse impact on the environment as a result of the missed sampling based on visual inspection and the subsequent results. Water (400 kL) was only discharged in Q3, and in no other quarter.			
Cause (or suspected cause) of non-compliance:			
Access issues at the time of sampling and discharge, which were not effectively escalated and resolved to enable sampling within the required timeframe.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Increased rigor around contractor management and communication to site teams when access issues arise.			
Was this non-compliance previously reported to DWER?			
No			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input type="checkbox"/> Reported to DWER in writing		Date:	

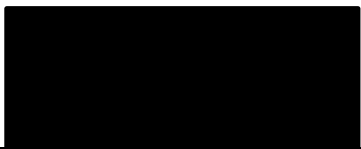

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.3.1	Date(s) of non-compliance:	Quarter 2 2021
Details of non-compliance:			
A monthly surface sample of TRH at the HV Washdown Bay standpipe ponds was recorded at 17 mg/L, in excess of the 15 mg/L limit. This was not considered to be a non-compliance, however DWER were notified immediately to follow due process. Water was not emitting from the emission point, rather a surface sample was taken. The following weekly sample was below the 15 mg/L 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.			
No known actual or suspected adverse impact on the environment as the emission point was not discharging at the time of the sample.			
Cause (or suspected cause) of non-compliance:			
Failure of OWS unit that was pumping into the pond.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The surface of the pond was vacuumed and taken to the bioremediation facility. The faulty unit was decommissioned and is currently going through a Management of Change to ensure adequate maintenance strategies once it is re-commissioned. A monthly surface sampling regime was introduced to increase rigor around surface water discharge sampling. Measures were taken to introduce weekly sampling and vacuum the surface of the pond of hydrocarbon. Subsequent weekly samples came in under the 15 mg/L limit.			
Was this non-compliance previously reported to DWER?			
Yes			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 09/02/2021	

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:	3.5.3	Date(s) of non-compliance:	Quarter 4 2021
Details of non-compliance:			
Access issue at HPSA1633 due to weather events meant this bore was unable to be accessed for the fourth quarterly hydrochemistry sample (April – June 2021).			
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 known actual or suspected adverse impact on the environment as a result of the missed sampling based on the preceding quarters' sampling results.			
Cause (or suspected cause) of non-compliance:			
Increased rain events caused the track to become inaccessible for the purposes of completing the required monitoring.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The bore will be scheduled to be visited at the beginning of the quarter in wet season to avoid this in the future.			
Was this non-compliance previously reported to DWER?			
No			
<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 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:	Asset President Western Australian Iron Ore (WAIO)	Position:	
Date:	30/08/2021	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.