



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

Once completed, please submit this form either via email to [info-der@dwer.wa.gov.au](mailto:info-der@dwer.wa.gov.au), or to the below postal address:

Department of Water and Environmental Regulation  
Locked Bag 33 Cloisters Square  
PERTH WA 6850

Section A – Licence Details			
Licence number:	L8621/2011/1	Licence file number:	2011/009784
Licence holder:	Roy Hill Iron Ore Pty Ltd		
Trading as:	Roy Hill Iron Ore Pty Ltd		
ACN:	123 722 038		
Registered address:	5 Whitham Road PERTH AIRPORT WA 6105		
Reporting period:	01/01/2018 to 31/12/2018		

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"> <li>• section C;</li> <li>• section D if required; and</li> <li>• sign the declaration in Section F.</li> </ul>
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"> <li>• section C;</li> <li>• section D if required;</li> <li>• section E; and</li> <li>• sign the declaration at Section F.</li> </ul>

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	66,832,408 tonnes / annual period processed 50,053,641 tonnes / annual period produced 0 tonnes for Magnetic Separation Plant (still under construction)
12	381,045.37 tonnes / annual period
52	0 MW
54	272.6 m <sup>3</sup> maximum daily average during annual period

<b>Section C – Statement of Actual Production</b>	
57	AV WWTP 253m <sup>3</sup> /day MSA WWTP 7.6m <sup>3</sup> /day PSA WWTP 12 m <sup>3</sup> /day
64	2,476.4 tonnes/ annual period
73	5,102 m <sup>3</sup> maximum capacity

<b>Section D – Statement of Actual Part 2 Waste Discharge Quantity</b>	
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
5	19,626,560 m <sup>3</sup> / annual period - tailings
6	399,888 tonnes/ annual period

<b>Section E – Details of Non-Compliance with Licence Condition</b>			
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:	1.2.16 (AN6)	Date(s) of non-compliance:	05/10/2018 to 31/12/2018
Details of non-compliance:			
Reinjection bores commenced operating before compliance documents were submitted to the CEO.			
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.			
There were no environmental impacts from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Reinjection bores RHIB0128, RHIB0129, RHIB0130 and RHIB131 were installed and commissioned in 2017 as part of a MAR trial. Other bores were installed and commissioned prior to licence being issued and an oversight resulted in not submitting the required compliance documentation			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Compliance requirements communicated to appropriate staff			
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: / /		

<b>Section E – Details of Non-Compliance with Licence Condition</b>			
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:	2.4.1	Date(s) of non-compliance:	07/02/2018 to 01/04/2018
Details of non-compliance:			
Evaporator usage non-compliant with windspeed and direction requirement during operation.			
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.			
There were no environmental impacts from this non-compliance			
Cause (or suspected cause) of non-compliance:			
Evaporator usage was not deemed adequate with restrictive conditions. The condition was removed eight months after RHIO requested the licence to be amended.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
An application to amend the licence was submitted in October 2017 requesting to remove condition on wind speed and wind direction based on findings from independent report. AN5 of the licence was issued in May 2018 removing this condition.			
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:	3.2.1	Date(s) of non-compliance:	18/04/2018 and 12/07/2018
Details of non-compliance:			
Volumetric Flow rates were not measured for discharge events to Southern recharge basin in April and July and Northern recharge basin in April. Electrical conductivity and Total Dissolved Solids were not measured for discharge to the Northern recharge basin in January 2018.			
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.			
There were no environmental impacts from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Manual flow meters were installed on the recharge basins to record volumes but not flow rates. Flow meter on discharge pipelines not linked to sensors for continuous monitoring.  Monitoring of electrical conductivity and total dissolved solids was inadvertently missed in January.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
RHIO will propose to amend condition 3.2 1 to reflect usage of recharge basins such that the total volume discharged is recorded. This will provide more meaningful data to DWER. Monitoring of electrical conductivity and total dissolved solids was rectified and conducted for the rest of the reporting period for each discharge event.			
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:	3.6.1	Date(s) of non-compliance:	05/10/2018 – 31/12/2018
Details of non-compliance:			
<p>Monthly monitoring (SWL, pH, EC and Oxidation-reduction potential) of Groundwater monitoring bores regional and Groundwater monitoring bores adjacent to reinjection bores was not completed in October and November 2018.</p> <p>Quarterly monitoring of some Groundwater monitoring bores was not completed (RHPZ0075, RHPZ0088, RHPZ0262, RHPZ0277 and RPHZ278).</p>			
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>			
There were no environmental impacts from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
<p>Monthly monitoring of MAR bores did not commence until December 2018 as they were not incorporated into the monitoring schedule until the compliance documentation was submitted. Some monitoring bores were inadvertently missed during sampling activities undertaken in December 2018.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
All monitoring requirements have now been added to the monitoring schedule.			
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:	4.1.2	Date(s) of non-compliance:	01/01/2018 to 31/12/2018
Details of non-compliance:			
The AACR was not submitted to the CEO within 90 calendar days after the end of the anniversary date.			
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.			
There were no environmental impacts from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
<p>Roy Hill Environment team lost key resources over the last two months and as a result was not able to finalise the AER by the required timeframe.</p> <p>The numerous amendment notices (AN) have resulted in added complexities to provide information for the time period to which each AN was in effect.</p> <p>The most recent AN incorporating MAR requires the reporting of additional data that was not previously required. Roy Hill required extra time to ensure correct data is provided in the correct format.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Recruit key environmental personnel as soon as possible.</p> <p>Request DWER to issue a new version of the licence incorporating all amendments.</p> <p>Establish internal processes to ensure data required to be reported in AER is readily available soon after the anniversary date.</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: / /	

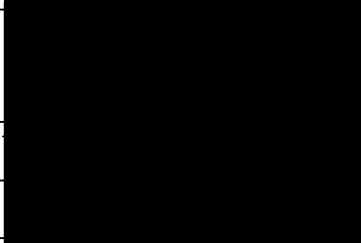
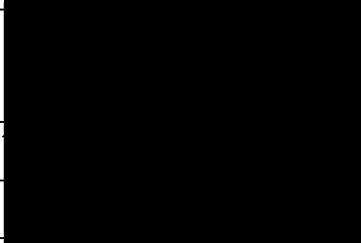
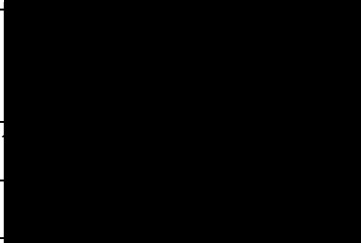
Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	4.2.1	Date(s) of non-compliance:	01/01/2018 to 31/12/2018
Details of non-compliance:			
The AER was not submitted to the CEO within 90 calendar days after the end of the anniversary date.			
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.			
There were no environmental impacts from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
<p>Roy Hill Environment team lost key resources over the last two months and as a result was not able to finalise the AER by the required timeframe.</p> <p>The numerous amendment notices (AN) have resulted in added complexities to provide information for the time period to which each AN was in effect.</p> <p>The most recent AN incorporating MAR requires the reporting of additional data that was not previously required. Roy Hill required extra time to ensure correct data is provided in the correct format.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Recruit key environmental personnel as soon as possible.</p> <p>Request DWER to issue a new version of the licence incorporating all amendments.</p> <p>Establish internal processes to ensure data required to be reported in AER is readily available soon after the anniversary date.</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:	4.3.1	Date(s) of non-compliance:	05/10/2018 to 31/12/2018
Details of non-compliance:			
Some bore logs were not submitted within 30 days of installation.			
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.			
There were no environmental impacts from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Installation dates included in bore logs were based on drilling dates however it can be a few days or weeks after drilling has been completed that headworks are installed. It is only at this stage that the bore logs can be finalized. Once this was identified, Roy Hill amended the bore logs to indicate the date the headworks were completed. Following the update of the bore logs, it was identified that there were still some bore logs that were inadvertently submitted 30 days after the headworks were installed.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Installation dates in bore logs is now the date headworks were installed. Additionally, licence requirements have been reiterated to relevant personnel to ensure bore logs are submitted within the required timeframe.			
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:	9.4.2019	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.