



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V Division 3*

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

Department of Water and Environmental Regulation  
Locked Bag 10  
Joondalup DC WA 6919

Section A – Licence details			
Licence number:	L8621/2011/1	Licence file number:	2011/009784
Licence holder name:	Roy Hill Iron Ore Pty Ltd		
Trading as:	Roy Hill Iron Ore Pty Ltd		
ACN:	123 722 038		
Registered business address:	5 Whitham Road PERTH AIRPORT WA 6105		
Reporting period:	01 / 01 / 2019 to 31 / 12 / 2019		

Section B – Statement of compliance with licence conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none"><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 in 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	69,986,996 tonnes / annual period processed 51,241,380 tonnes / annual period produced 0 tonnes for Magnetic Separation Plant
6	4,615,888 tonnes / annual period
12	389,722 tonnes / annual period
52	0 MW
73	5,102 m <sup>3</sup> maximum
85B	0.357 G/L per year

<b>Section C – Statement of actual production</b>	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
<b>Prescribed premises category</b>	<b>Actual production quantity</b>
54	AV WWTP 298.7 m3/day MSA WWTP 7.8 m3/day PSA WWTP 9.4 m3/day
57	1408.95 tonnes / annual period
64	Inert Waste - 0 tonnes Putrescible Waste - 1,375 tonnes/ annual period Clean Fill – 0 tonnes

<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.	
<b>Prescribed premises category</b>	<b>Actual Part 2 waste discharge quantity</b>
5	18,412,392 m3 / annual period - tailings
6	4,615,888 tonnes (Managed Aquifer Recharge)
85B	42,124 m3 (RO reject water)
54	115,317m3 (Treated waters to spray field)

<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:	1.2.4 (AN7)	Date(s) of non-compliance:	April 2019 - Oct 2019
Details of non-compliance:			
During a DWER inspection it was identified that between revisions of the Operating Licenses and the move to Landfill 2, LV tyre disposal into Landfill 2 was no longer permitted by the License, however LV tyre disposal into Landfill 2 continued to occur.			
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, tyre disposal was immediately ceased when DWER identified that the wording in the license did not allow for disposal of LV tyres into Landfill 2.			

Section E – Details of non-compliance with licence condition	
Cause (or suspected cause) of non-compliance:	
Oversight between license amendments 6 and 7 when switching from Landfill 1 to Landfill 2.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
LV tyre disposal was immediately ceased from the time of the DWER inspection at Landfill 2. Roy Hill submitted an Operating License amendment application to include the disposal of LV tyres at Landfill 2. Licence Amendment 8 which was received in October 2019 permitted tyre disposal into Landfill 2 and Roy Hill recommenced this activity.	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input checked="" type="checkbox"/> Reported to DWER verbally	Date: 10 / 04 / 2019
<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:	3.1.3 (AN6)	Date(s) of non-compliance:	Nov 2019
Details of non-compliance:			
No documented evidence of EC instrument calibration records have been available. It was reported that calibrations were occurring in accordance with manufacturers specifications however no records could be produced to verify this.			
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 environmental impact was recorded. Results from laboratory testing confirms values under prescribed trigger values.			
Cause (or suspected cause) of non-compliance:			
Field instrument technicians have not been formally recording details of calibration activities.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Field technician to keep formal records of calibration activities.			
Was this non-compliance previously reported to DWER? <b>No</b>			
<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 (AN8)	Date(s) of non-compliance:	July – Sep 2019
Details of non-compliance:			
MAR Injection bores - 6 Injection bores (RHIB0258, RHIB0260, RHIB0261, RHIB0262, RHIB0263, RHIB0266) were missed for one quarterly monitoring event (quarter 3).			
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.			
It is not expected that any environmental impact occurred as a result of this missed sampling event. EC readings show no non-compliances with reinjected water during this period.			
Cause (or suspected cause) of non-compliance:			
This non-compliance was due to an error in the site monitoring schedule.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monitoring schedule was rectified to include the above noted missing bores and site environment team informed of non-compliance. Further to this the site team undertook additional training in operating license requirements.			
Was this non-compliance previously reported to DWER? <b>No</b>			
<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 (AN6)	Date(s) of non-compliance:	August 2019
Details of non-compliance:			
Total Recoverable Hydrocarbons (TRH) were not sampled during one quarterly sampling event in August 2019 (06/08/2019) for both the Landfill 2 bores and the Mine Bulk Fuel bore.			
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.			
It is considered that no environmental impact occurred as a result of this non-compliance.  Monitoring events that have occurred prior to and post the missed sampling event showed undetectable TRH in groundwater.			
Cause (or suspected cause) of non-compliance:			
This non-compliance occurred due to human error on the day of monitoring and by the time the error was realized it was too late to resample within that quarter.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Site monitoring schedule was improved and re-formatted to make it easier to understand what is required at each monitoring site.  System put in place to better screen missing analytes from laboratory.  Person involved in non-compliance was re-trained in groundwater compliance monitoring to ensure full understanding of site requirements was achieved.			
Was this non-compliance previously reported to DWER? <b>No</b>			
<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 (AN6)	Date(s) of non-compliance:	August 2019
Details of non-compliance:			
Mercury was not provided in the lab report for Quarter 3 for Landfill bores (RPHZ0091 and RHPZ0092) due to lab error.			
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.			
It is unlikely that there was any measurable environmental impact as a result of the lab error. Mercury concentrations in all other quarters were negligible.			
Cause (or suspected cause) of non-compliance:			
Mercury was omitted from the lab testing, this was a lab error.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
This non compliance has been communicated with the laboratory.			
Was this non-compliance previously reported to DWER? <b>No</b>			
<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 (AN6)	Date(s) of non-compliance:	Oct 2019 – Dec 2019
Details of non-compliance:			
All MAR monitoring bores are missing quarterly analysis for Nitrate and Nitrite analysis between October and December due to a laboratory quotation error. Laboratory errors also contributed to missing calcium and magnesium analysis in December for 18 bores and mercury and carbonate in November for 13 and 19 bores respectively.			
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 material environmental impact was noted as a result of these missed analytes.			
Cause (or suspected cause) of non-compliance:			
An error in an updated laboratory quotation was the cause for missed Nitrate and Nitrite. Lab error was the cause for missed magnesium, carbonate, calcium, mercury and carbonate.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Lab quote has since been rectified and laboratory has been notified of missed analytes.			
Was this non-compliance previously reported to DWER? <b>No</b>			
<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 (AN6)	Date(s) of non-compliance:	May 2019
Details of non-compliance:			
One bore log (RHPZ0286S/D) was submitted later than 30 days after installation of drill holes. The event was captured as an incident in Roy Hill Incident Management System (INX) and actions have been put in place to prevent it from re-occurring.			
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 environmental impact occurred as result of this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Poor communication between relevant teams to facilitate the timely submission of compliance documentation to DWER.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Relevant teams within Roy Hill made aware of the importance of expediting bore logs and other relevant information to ensure compliance documentation can be completed and communicated to DWER on time.			
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:	CEO	Position:	
Date:	18.03.2020	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.