



# Annual Audit Compliance Report

*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:	L8653/2012/2	Licence file number:	2012/003930-4~13
Licence holder name:	BHP Nickel West Pty Ltd		
Trading as:	BHP Nickel West		
ACN:	004184598		
Registered business address:	125 St Georges Terrace PERTH 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"> <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
Category 44: Metal smelting and refining	160,605 t Nickel Concentrate
Category 31: Chemical manufacturing	108,317 t Sulphuric Acid
Category 52: Electric power generation	8,439 MWh electricity self-generated
Category 87: Fuel burning	442,213 kg natural gas
Category 39: Chemical or oil recycling	2,315 t waste oil recycled

**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 44: Metal smelting and refining	Slag Produced 149,323 t

**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:	1.7	Date(s) of non-compliance:	Jul 2024 – Jun 2025
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Details of non-compliance:

*Condition 1, table 1, item 7: Residue Dam 2 (SRD2) must maintain a minimum operational freeboard of 400 mm, such that it can maintain a minimum top of embankment freeboard of 300mm.*

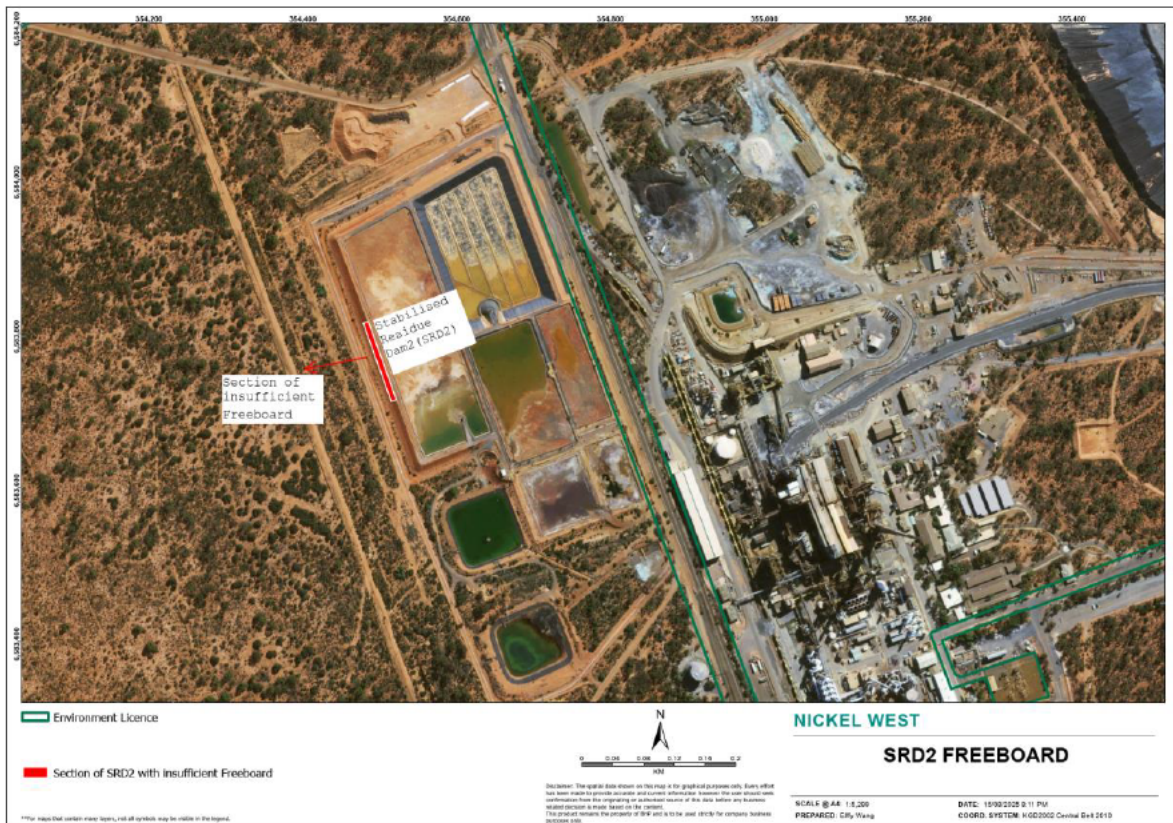
Visual inspection identified that a section of SRD2 does not have an embankment freeboard of 300mm.

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 impact from this non-compliance.

The residue is still fully contained inside the embankment bund, and there has been no overtopping event.



Cause (or suspected cause) of non-compliance:

The cause of this non-compliance was operational delays in commissioning residue dam 3, resulting in material continuing to be deposited into residue pond 2. The pond has capacity at the southern end greater than 300mm however in some sections on the western boundary material has solidified with insufficient freeboard.

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

The residue ponds are interconnected and stormwater inflow during temporary suspension will be balanced across the ponds minimising potential for any overtopping.

Additional residue produced during temporary suspension to be deposited at southern end of Residue Pond where there is sufficient freeboard.

Options to remove solidified residue and reinstate freeboard to be considered by NiW during 2025.

Was this non-compliance previously reported to DWER?

No, and

Reported to DWER verbally	Date: / /
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Reported to DWER in writing	Date:
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**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:	1.15 b	Date(s) of non-compliance:	Jul 2024 - Jun 2025
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Details of non-compliance:

*Condition 1.15: Vehicle washdown bay b) Wastewater must be directed to an oil/water separator prior to disposal to a collection sump;*

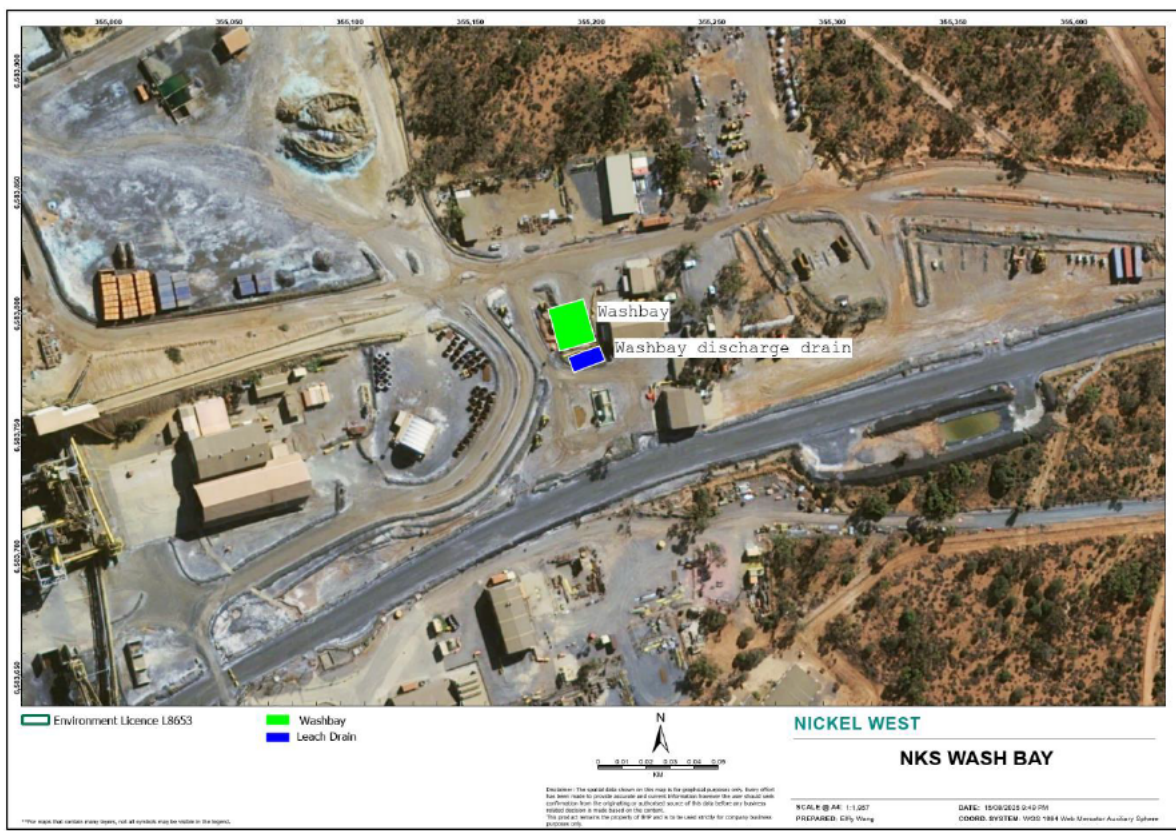
The site operated the washdown bay while not equipped with an oil/water separator.

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.

The impacted area is partially sealed and located within the disturbance footprint of the smelter premise. As the impacted area is in the middle of plant and partially sealed, it has no existing vegetation or fauna interaction. With the Operation now in temporary suspension, the use of the wash down bay has ceased.

During 2025 NiW will complete additional investigations to determine if any impact has occurred as a result of the non-compliance.



Cause (or suspected cause) of non-compliance:

The cause of non-compliance is due to no mechanical oil/water separator being installed at the wash bay.

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

1. Stopped usage of washdown bay immediately
2. Oil/water separator is currently being sourced

Was this non-compliance previously reported to DWER?

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:	22	Date(s) of non-compliance:	28/06/2024
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Details of non-compliance:

*Condition 22: The licence holder must ensure that the monitoring equipment referred to in Condition 21, Table 7 is maintained and operated so as to provide reliable data for greater than 90 percent of the time in every calendar month, and for greater than 95 percent of the time in any period of twelve calendar months.*

NKS Weather Station was not able to provide reliable data for greater than 90 percent for the month of July 2024.

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 environmental impact has resulted from the unavailability of weather station data.



Cause (or suspected cause) of non-compliance:

On 28 June 2024, the NKS Weather Station ceased operation due to a lightning strike. The repair work was prioritised and completed by 19 July 2024. However, due to the downtime, NKS was unable to meet 90% monthly reliability requirement.

Section E – Details of non-compliance with licence condition	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Lightning damage to weather station instrumentation on 28 June 2024. Following assessment of damage the following actions were completed:</p> <p>05/07/24 - 60m wind monitor repaired and returned. Repairs to the 30m wind monitor were not successful. 10m Temperature sensor reinstated.</p> <p>11/07/24 – Radio communication link re-established.</p> <p>19/07/24 - 30m wind speed and all other instruments restored</p> <p>Improvement opportunities of the lightning protection system have paused, due to the Temporary Suspension of Operations, the weather station is not required when the smelter is not operational.</p>	
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: 14/8/2024

**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:	34	Date(s) of non-compliance:	Mar 2025
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Details of non-compliance:

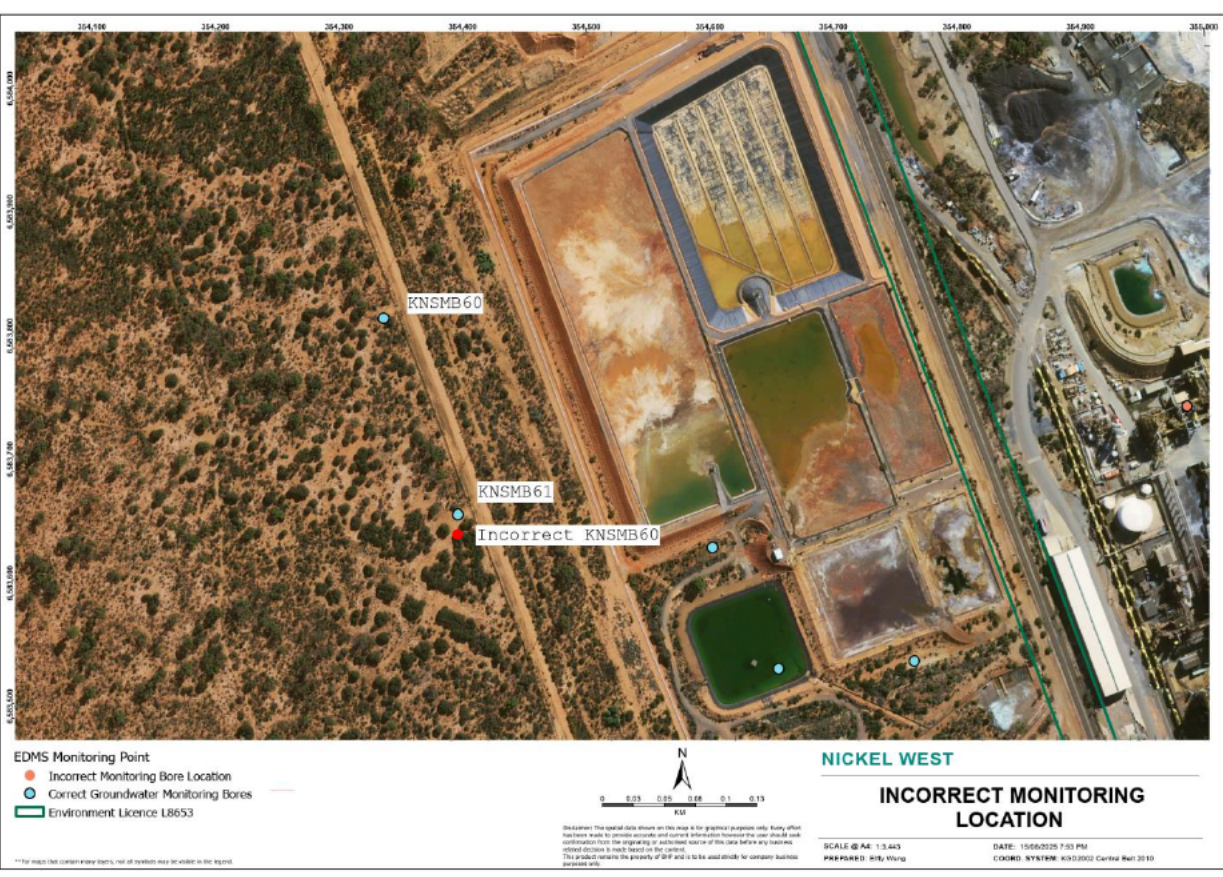
*Condition 34: The licence holder must monitor the groundwater for concentrations of the parameter listed in Table 8:*

- a) at the corresponding monitoring location;
- b) in the corresponding unit;
- c) at no less than the corresponding frequency;
- d) for the corresponding averaging period; and
- e) using the corresponding method, as set out in Table 8.

During the March 2025 sampling round, it was identified that the incorrect bore had been sampled for KNSMB60.

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 impact from this non-compliance.




Cause (or suspected cause) of non-compliance:

The discrepancy is suspected to originate during the transition from the previous groundwater monitoring service provider during 2023. The monitoring bores are in close proximity to each other which caused the confusion.

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

<b>Section E – Details of non-compliance with licence condition</b>	
Bore has been labelled with bore ID in the field and re-sampled in May 2025. The correct location has been recorded and shared with the current sampling service provider. Ongoing field verification continues to help improve sampling accuracy.	
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.			
			
Date:	16/9/25	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.