



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Once completed, please submit this form either via email to info@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:	L9224/2019/1	Licence file number:	DER2019/000563
Licence holder:	Yara Pilbara Fertilisers Pty Ltd		
Trading as:			
ACN:	095 441 151		
Registered address:	Level 10, 233 Adelaide PERTH WA 6000		
Reporting period:	01 / 01 / 2024 to 31 / 12 / 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)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none">• section C;• section D if required; and• sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none">• 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
31: chemical manufacturing	600,328 T Ammonia
85: sewage facility	2,911 m ³

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

Section D – Statement of Actual Part 2 Waste Discharge Quantity	
NA	NA

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:	14	Date(s) of non-compliance:	July 2024 and August 2024
---------------	----	----------------------------	---------------------------

Details of non-compliance:

As per the CEMS Code data availability should be greater than or equal to 90 percent, based on the calendar month. The Primary Reformer did not comply with this requirement, achieving 82% availability in July and 60% availability in August for flow rate.

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.

Cause (or suspected cause) of non-compliance:

The Primary Reformer CEMS unit provided erroneous results for 435 hours. Intermittent fault suspected; vendor required to fix.

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

CEMS unit repaired. Vendor couldn't fix remotely, delay in bringing to site.

Was this non-compliance previously reported to DWER?

No

Yes, and

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:	6	Date(s) of non-compliance:	Ongoing (recurring)
Details of non-compliance:			
Primary Reformer NO _x (as NO ₂) emissions exceed the Licence limit of 180 mg/m ³ once every 26-32 hours (220 hours total for 2023).			
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 is expected.			
Cause (or suspected cause) of non-compliance:			
A recurring exceedance for the Primary Reformer was first identified when the CEMS unit was installed. It was identified that the NO _x (as NO ₂) emissions are exceeding the Licence limit of 180 mg/m ³ once every 26-32 hours. Further analysis has shown that these high NO _x readings are correlating with a recurring production process step (molecular sieve regeneration) that was not otherwise observable without CEMS installed. The peaks in NO _x above the Licence limit occurs for approximately 90 minutes per event. DWER was first notified of this recurring exceedance on the 8 th of September 2020.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Yara has investigated various options to reduce NO_x emissions either through plant optimisation or capital improvements. Through these investigations and process optimisation trials, a reduction in NO_x emissions has been realised by:</p> <ul style="list-style-type: none"> • Reducing the rate of pressure decrease at the beginning of the molecular sieve regeneration process to slow the rate at which absorbed NH₃ is liberated from the sieve; • Shortening the in-service time of the molecular sieve regeneration; • Adjusting the oxygen balance to increase waste gas combustion performance within the Primary Reformer; and • Replacement of a faulty valve that was found to be affecting both sieves during the molecular sieve regeneration process. <p>An update was provided to DWER in December 2023 and a licence application made.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	

Section E – Details of Non-Compliance with Licence Condition	
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 05/01/2024, 12/01/2024, 19/01/2024, 25/01/2024, 02/02/2024, 09/02/2024, 15/02/2024, 23/02/2024, 05/03/2024, 12/03/2024, 19/03/2024, 27/03/2024, 04/04/2024, 15/04/2024, 22/04/2024, 30/04/2024, 06/05/2024, 13/05/2024, 20/05/2024, 28/05/2024, 06/06/2024, 13/06/2024, 20/06/2024, 27/06/2024, 03/07/2024, 10/07/2024, 17/07/2024, 24/07/2024, 31/07/2024, 07/08/2024, 14/08/2024, 23/08/2024, 29/08/2024, 05/09/2024, 12/09/2024, 19/09/2024, 26/09/2024, 03/10/2024, 10/10/2024, 17/10/2024, 24/10/2024, 31/10/2024, 07/11/2024, 14/11/2024, 21/11/2024, 28/11/2024, 05/12/2024, 12/12/2024, 19/12/2024, 24/12/2024, 31/12/2024, 07/01/2025

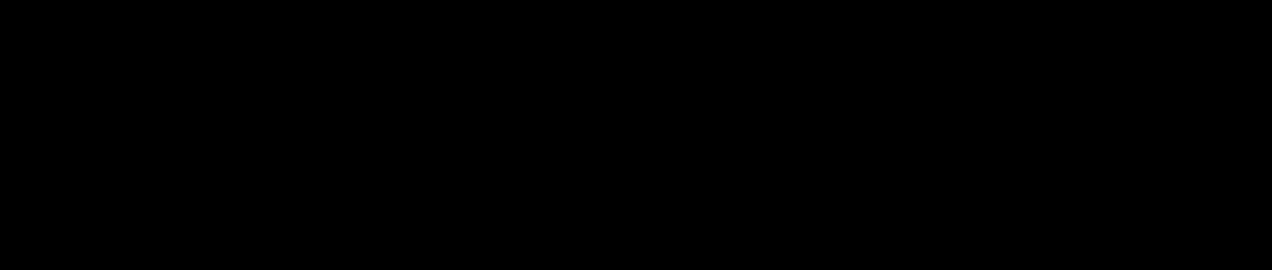
Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	25	Date(s) of non-compliance:	02/02/2024, 05/03/2024, 30/04/2024 and 28/05/2024
Details of non-compliance:			
As per Condition 25 a non-compliance must be reported to the CEO within seven (7) days of detection with Conditions 6, 8 and 9. The recurring non-compliance with Condition 6 (refer above) was not reported within this timeframe for the 25/01/2024 (8 days), 23/02/2024 (11 days), 24/02/2024 (10 days), 26/02/2024 (8 days), 22/04/2024 (8 days) and 20/05/2024 (8 days).			
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			
Cause (or suspected cause) of non-compliance:			
Administrative error			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Recurring calendar reminder set			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No			
<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:	18	Date(s) of non-compliance:	06/03/2024, 13/06/2024, 28/08/2024, 19/12/2024
Details of non-compliance:			
As per Condition 18, note 3 limits of reporting must be lower than the site-specific proposed trigger levels specified in the Western Environmental Groundwater data review. The proposed trigger value for BFE for cadmium is 0.55 µg/L. During the reporting period the limit of reporting for BFE's cadmium is 2 µg/L.			
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			
Cause (or suspected cause) of non-compliance:			
Due to hyper salinity BFE samples are required to be diluted to determine metal concentrations. The current NATA accredited laboratory which undertakes groundwater analysis is unable to achieve the desired LOR.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
YPF groundwater bores will continue to be monitored. If any groundwater wells have a cadmium detection (currently all licence wells are beneath limit of detection) then alternative labs will be investigated to determine if LOR is able to be achieved.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No			
<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 particular¹.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation’s (DWER) website.



Date:	28/03/2025	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.