

### 3.3 L9229/2019/1

BHP Nickel West Pty Ltd (NiW) owns and operates the Cliffs Mine Site (Cliffs) which is located in the Shires of Leonora and Wiluna, Western Australia. Cliffs is situated 4 kilometres south of the NiW Mount Keith Nickel Mine, and about 1 kilometre east of the Goldfields Highway.

A licence application was approved by the Department of Water and Environmental Regulation (DWER), on the 27/06/2023, for the modification of the reporting year from a calendar year to financial year to align with other NiW licences.

This report has been prepared to meet the AACR reporting requirements of Condition 6 of Part V Licence L9229/2019/1, for the period of 1 July 2024 to 30 June 2025.

An Annual Compliance Audit has been performed in accordance with requirements of Condition 6 of L9229/2019/1. There was one non-compliance events identified and these are captured in the attached AACR.



# Annual Audit Compliance Report

*Environmental Protection Act 1986, Part V Division 3*

Section A – Licence details			
Licence number:	L9229/2019/1	Licence file number:	DER2019/000640
Licence holder name:	BHP Nickel West Pty Ltd		
Trading as:	BHP Nickel West		
ACN:	004 184 598		
Registered business address:	125 St Georges Terrace, PERTH WA 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 5: Processing or beneficiation of metallic or non-metallic ore	1,430 tonnes
Category 12: Screening etc.	0
Category 57: Used Tyre Storage	<150 tyres

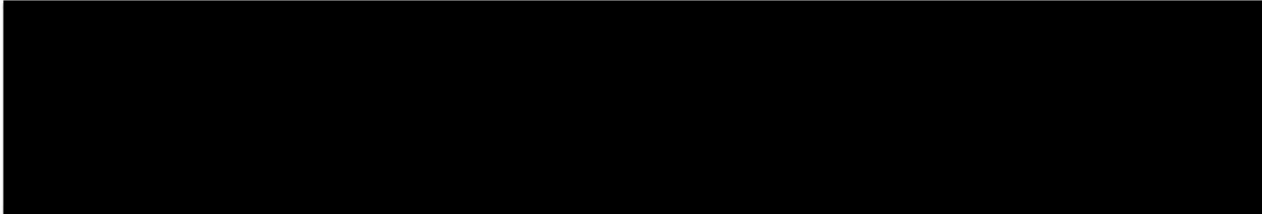
Section D – Statement of actual Part 2 waste discharge quantity	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed premises category	Actual Part 2 waste discharge quantity
Category 64: Class II or III putrescible landfill site	146.88 tonnes

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:	2	Date(s) of non-compliance:	23/05/2025
Details of non-compliance:			
<p><i>Condition 2: The Licence Holder shall ensure that where wastes produced on the Premises are not taken off-site for lawful use or disposal, they are managed in accordance with the requirements in Table 2.</i></p> <p>During routine inspections it was identified that hydrocarbon contaminated material had exceeded the 0.5m licenced thickness and mechanical mixing and turning of the material had not occurred at a minimum of monthly.</p>			
<p>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.</p>			
<p>All material is contained within HDPE lined cells. No actual or suspected environmental impact from this non-compliance.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Following the transition into temporary suspension, poor communication of the requirements of the condition resulted in an oversight in the maintenance of this facility.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Operational personnel were educated on the requirements of managing this facility. Operational personnel have completed maintenance of the facility with the material being levelled out to the desired thickness and mechanically tilled.</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 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:	12/9/25	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.