

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, 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:	L4275/1982/15	Licence file number:	2011/000451-3
Licence holder name:	Mid West Ports Authority		
Trading as:	Mid West Ports Authority		
ACN:	73 384 989 178		
Registered business address:	PO Box 1856, Geraldton WA 6531		
Reporting period:	01 / 07 / 2022	to 30 / 06 / 2023	

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)

- ☐ Yes please complete:
 - section C;
 - section D (if required); and
 - · sign the declaration in Section F.
- No − please complete:
 - · section C;
 - section D (if required);
 - section E; and
 - sign the declaration in Section F.

Section C - Statement of actual production

Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.

be attached.		
Prescribed premises category	Actual production quantity	
58: Bulk material loading or unloading; premises on which clinker, coal, ore, ore concentrate or other bulk granular material (other than salt) is loaded onto or unloaded from vessels by an open material loading system	A total of 13,506,006 tonnes of licenced commodities were handled through the Geraldton Port during the reporting period. Note: this excludes Grain, Petroleum, General Cargo, Stockfeed and Livestock.	
58A: Bulk material loading or unloading: premises on which salt is loaded onto or unloaded from vessels by an open material loading system	0 Tonnes	

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 N/A

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.

1.2.5 a) implement all practical measures to prevent stormwater runoff becoming contaminated by activities on the Premises; and b) treat contaminated or potentially contaminated stormwater as necessary prior to being discharged from the Premises. Date(s) of non-compliance: 29/07/2022	at a time during the reporting period.			
mont the Freninses	Condition no:	a) implement all practical measures to prevent stormwater runoff becoming contaminated by activities on the Premises; and b) treat contaminated or potentially contaminated stormwater as necessary	* *	29/07/2022

Details of non-compliance:

As a result of heavy rainfall experienced over a short duration of time on Friday 29th July, visible plumes of elevated turbidity were observed in the Port of Geraldton's commercial harbour, alongside Berth 5. Rainfall recorded at the Geraldton Airport indicated 10.4mm of rainfall was experienced resulting in localised flooding events throughout the township. Elevated turbidity was evident along Berth 5 and is believed to have discharged into the harbour mainly via stormwater run-off from iron-ore vessel Guang Mao's deck scupper, in addition to licenced stormwater outfalls SW11 and SW14.

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.

Visual plume of turbidity and discoloration was contained within commercial harbour for a period of less than 4 hours. No water discolouration was observed at the entrance of the commercial harbour, indicating no adverse impact occurred to the wider marine environment of Champion Bay.

Cause (or suspected cause) of non-compliance:

Heavy rainfall. Iron-ore flushed through MWPA stormwater system and vessel deck scupper.

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:			
discharge to the ha	ater systems has been initiate rbour. Housekeeping procedu th the MWPA Dust Managem ure events.	ıres have also been re	viewed with iron-ore
Was this non-comp	liance previously reported to	DWER?	
$oxed{\boxtimes}$ Yes, and			
☐ Reported to	DWER verbally	Date: / /	
⊠ Reported to	DWER in writing	Date: 02 / 08 / 2	022 ICMS 66357
Section E – Deta	ils of Non-Compliance w	th Licence Condition	on
Please use a separ at a time during the	ate page for each condition was reporting period.	vith which the licence h	nolder was non-compliant
Condition no:	3.2.1 - Continuous Monitoring during Shiploading Event	Date(s) of non- compliance:	13/09/2022
Details of non-comp	oliance:		
At 14:20 on 13/09/2022 the residual current devices supplying power to the Lemmon Road compound were tested. The Lemmon Rd unit did not re-start sampling until 17:20. As the period without real time sampling was greater than 2 hours, the sampling day at Lemmon Rd is invalid.			
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.			
There is no suspected environmental impact. Winds were from the Southwest during the outage and not from the Port direction.			
Cause (or suspected	ed cause) of non-compliance:		
RCD testing.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Improved communication between electrical department to inform the Monitoring Technician prior to testing RCD's on monitoring equipment.			
Was this non-compliance previously reported to DWER?			
⊠ Yes, and			
Reported to DWER verbally Date: / /			
□ Reported to DWER in writing □ Date: 25/10/2022 in Q1 Air Quality Monitoring Report			

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Section E - Deta	ils of Non-Compliance w	ith Licence Condition	on
Please use a separat a time during the	rate page for each condition verting period.		nolder was non-compliant
Condition no:	Schedule 2	Date(s) of non- compliance:	24/09/2022
Details of non-com	pliance:		
on 24th September	commenced loading zinc on 1120 hours. A Post-Concen- ing period as the Sampler re- work instructions.	trate Sample was not o	onducted over the 24
What was the actua	al (or suspected) environmen	tal impact of the non-c	ompliance?
NOTE – please attac compliance took place	h maps or diagrams to provide i e.	nsight into the precise loo	cation of where the non-
There is no suspected environmental impact. Winds were from the South to Southeast during the period. The real-time monitors downwind of port operation measured low levels of PM10 dust during the period.			
Cause (or suspecte	ed cause) of non-compliance:		
Sampler Error.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A communication board installed to prevent future miscommunication.			
Was this non-compliance previously reported to DWER?			
⊠ Yes, and			
Reported to	DWER verbally	Date: / /	
⊠ Reported to	DWER in writing	Date: 25/10/2022 in Monitoring Report	n Q1 Air Quality

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. Section 3.2 Ambient environmental quality Date(s) of non-Condition no: monitoring (Table 3.2.1). 06/10/2022 compliance: Section 4.2 Reporting (Table 4.2.2) Details of non-compliance: Air quality monitoring recorded an elevated concentration of nickel as Total Suspended Particulates (TSP) at the Connell Road high volume air monitor. A concentration of 0.22ug/m3 was recorded on the 6th October above the target level of 0.14ug/m3 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 noncompliance took place. Short-term impact on air quality from nickel concentrate dust emissions. Cause (or suspected cause) of non-compliance: The following contributing factors were identified during the ICAM investigation: Vessel hold misting unit was not used at all times during loading of nickel shipment. Bobcat sweeper attachment used which potentially created dust during use. Product left mine site with moisture level below DEM. Wind direction was light south-easterly resulting in monitor on Connell Road being downwind of loading operations on Berth 6. Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: The following corrective actions were established to prevent reoccurrence: 1. Product owner to establish procedure for product moisture conditioning prior to rotainer loading, to account for predicted moisture loss and adherence to DEM level. The Moisture Management Plan for nickel concentrate was revised to include a requirement that all product is above the DEM level for shiploading. 2. Moisture addition via vessel hold misting to be monitored and allow for continuous operation during shiploading. Alternate misting units were also investigated by Qube, with an upgraded system to be purchased and implemented in early 2023. 3. A vacuum sweeper to be used on the berth for the duration of shiploading, in place of the bobcat with sweeper attachment. 4. A temporary misting unit to be investigated for interim shed storage, to limit moisture loss that may occur during stockpiling. Was this non-compliance previously reported to DWER? Yes, and Reported to DWER verbally Date: 1 1

Date:

03 / 11 / 2022 ICMS 67205

Reported to DWER in writing

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:	Schedule 2	Date(s) of non- compliance:	21/11/2022
Details of non-comp	oliance:		
to incorrect placeme Sample for Majestic and Lemmon Road	for Port Way and Lemmon Rent in the filter cartridges. The Marina, which was loaded was monitors were not downwing sampling period showed elements.	e incident was during t vith Round Oak Coppe I of Berth 6 operations	he Post Concentrate r Concentrate. Port Way
What was the actua	al (or suspected) environmen	tal impact of the non-c	ompliance?
compliance took plac			
There is no expected environmental impact. Port Way and Lemmon Road monitors were not downwind of Berth 6 operations on the day. None of the PM10 results for the sampling period showed elevated levels.			
Cause (or suspecte	ed cause) of non-compliance:		
Sampler error			
Sampler error Action taken to miti	ed cause) of non-compliance:		event recurrence of the
Action taken to mitinon-compliance: Training provided to		on-compliance and pro	
Action taken to mitinon-compliance: Training provided to were review and for	gate any adverse effects of n	on-compliance and proent in future. PM10 re	
Action taken to mitinon-compliance: Training provided to were review and for	gate any adverse effects of no ensure correct filter placem und no elevated results.	on-compliance and proent in future. PM10 re	
Action taken to mitinon-compliance: Training provided to were review and for Was this non-comp	gate any adverse effects of no ensure correct filter placem und no elevated results.	on-compliance and proent in future. PM10 re DWER?	

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:

1.3.4 - the licence holder shall ensure that measures are taken to prevent spillage entering the marine environment via the gap between the berth and the vessel.

Date(s) of noncompliance:

11/02/2023

Details of non-compliance:

A grab and hopper arrangement was being used to unload fertiliser (Muriate of Potash (MOP)) from a vessel (MV African Pipit) on Berth 6 at the Port of Geraldton.

During the post-loading berth handover inspection, it was found that an amount of fertiliser material remained sitting on the berth edge and fenders, indicating that residual material may have been entering the marine environment during loading via the gap between the berth and vessel. The total quantity of residual material is unknown but likely to be negligible.

Review of the operations identified that the spill plates (which are designed to cover the gap between the vessel and the berth) were in place during loading of the first parcel but the spill plates were not opened. MWPA understands that the rationale for not opening the spill plates being that the vessel draft was such that it would interfere with the normal operation of the spill plates, giving rise to a safety risk and potential damage to both the plates and the vessel. Additionally, review of berth clean-up operations determined that a handheld blower was used incorrectly which resulted in some fertiliser material blowing off the Berth edge and into the marine environment. The blower was in operation for approximately 15 minutes.

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.

MOP is soluble in water and would have resulted in elevated nutrient levels within marine waters in proximity to Berth 6. The total quantity of the spilt material is unknown but likely to be negligible and expected to have dissipated quickly due to the natural water movements within the harbour. Environmental impact is considered to have been short-term and contained within the commercial harbour.

Cause (or suspected cause) of non-compliance:

Information provided by stevedores and investigation of the incident by MWPA has identified the following:

- Spill plates were not appropriately set up to completely protect the gap between the berth and vessel, principally due to vessel draft during discharge of Parcel 1.
- Gaps between spill plates were present on Parcel 2 due to plate design and positioning of berth bollards.
- Stevedore procedures for fertiliser loading and berth clean-up do not clearly articulate a methodology to ensure spillage is contained on the berth.

Department of Water and Environmental Regulation

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:

The majority of fertiliser spillage on Berth 6 during loading operations was swept up and removed as part of routine procedures for fertiliser discharge. Spilt material on the fender line and berth edge identified in the post-loading berth handover inspection was recovered using a vacuum truck.

MWPA, in conjunction with stevedores, identified the following corrective actions to reduce likelihood of a similar event reoccurring:

- MWPA completed an engineering design review of spill plates to address low vessel draft and placement around bollards on Berth 6. Two prototype redesigned spill plates have since been commissioned which will be tested for suitability.
- To ensure methodology for spill containment and berth clean-up is clearly articulated, stevedore procedures for fertiliser discharge were reviewed and approved by MWPA.
- Review of MWPA procedure for Unloading Fertiliser Using Hoppers was undertaken to ensure all customers and stevedores are aware of requirements to prevent fertiliser spillage.

Was this non-compliance previously reported to DWER?		
⊠ Yes, and		
☐ Reported to DWER verbally	Date: / /	
⊠ Reported to DWER in writing	Date: 14 / 02 / 2023 ICMS 68580	

Section E – Deta	ils of Non-Compliance w	ith Licence Conditi	on
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- Continuous Monitoring during Shiploading Event	Date(s) of non- compliance:	14/03/2023
Details of non-comp	oliance:		
On 14/03/2023 a ci due to greater than	ty wide power outage caused 2 hours downtime.	I the days Realtime PN	110 sampling to be invalid
What was the actua	al (or suspected) environmen	tal impact of the non-c	ompliance?
compliance took plac			
•	ted environmental impact. Si utage and showed no elevat	•	d to operate (via solar
Cause (or suspected cause) of non-compliance:			
A power outage.			
Action taken to miti non-compliance:	gate any adverse effects of n	on-compliance and pre	event recurrence of the
N/A			
Was this non-compliance previously reported to DWER?			
⊠ Yes, and			
☐ Reported to	DWER verbally	Date: / /	
⊠ Reported to	DWER in writing	Date: 28/04/2023 in Monitoring Report	n Q3 Air Quality

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- Continuous Monitoring during Shiploading Event	Date(s) of non- compliance:	18/03/2023
Details of non-comp	oliance:		
On 18/03/2023 a city wide power outage caused the days Realtime PM10 sampling to be invalid due to greater than 2 hours downtime. When the power returned the monitor at Lemmon Road did not resume sampling. Multiple issues needed to be rectified to return the unit to working order. - The TEOM control unit blew two fuses. - The UPS went into fault, the battery fully discharged and needed manual charging. - The RS 232 from the control unit into the data logger dislodged during the fuse replacement. Lemmon Road resumed sampling on 20/03/2023 at 1500.			
What was the actua	al (or suspected) environmen	tal impact of the non-c	ompliance?
NOTE – please attack	h maps or diagrams to provide i e.	nsight into the precise loo	cation of where the non-
There is no suspected environmental impact. During most of the outage the affected monitor was not downwind of port operations.			
Cause (or suspecte	Cause (or suspected cause) of non-compliance:		
A power outage/surge causing blown fuses.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The unit was reinstated.			
Was this non-compliance previously reported to DWER?			
⊠ Yes, and			
Reported to I	DWER verbally	Date: / /	
⊠ Reported to I	DWER in writing	Date: 28/04/2023 in Monitoring Report	n Q3 Air Quality

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. Section 3.2 Ambient environmental Date(s) of non-Condition no: quality monitoring (Table 3.2.1). 26/04/2023 compliance: Section 4.2 Reporting (Table 4.2.2) Details of non-compliance: A result of 0.55ug/m3 lead as PM10 was recorded at the Lemmon Road monitoring station, exceeding the licence target level of 0.50ug/m3. The exceedance was recorded for the 24hr period from 26 - 27 April 2023 (midday to midday). A result of 2.9ug/m3 lead as Total Suspended Particulates (TSP) was also recorded at Lemmon Road for the same period. The 3month rolling average limit for lead was calculated to be 0.047ug/m3 and well below the licence limit of 0.5ug/m3. 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 noncompliance took place. Short-term impact on air quality from lead concentrate dust emissions. Cause (or suspected cause) of non-compliance: An ICAM investigation was undertaken which identified the following contributing factors to be root causes of the exceedance: Product oxidisation forming lumps, created abnormal loading conditions with higher potential for dust to be generated from the partially open conveyor system on Berth 4 Light ESE wind conditions allowed dust to migrate from Berth 4 to the Lemmon Road monitor Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: Several corrective actions were identified: 1. Wind and tonnage loading limits for HPM to be revised based on the Dust Modelling Study being undertaken by MWPA 2. MWPA to review wind conditions for historical HPM loading events to confirm and validate impact to the Lemmon Road monitor during ESE wind conditions < 10 knots 3. MWPA to revise Berth 4 Metal Concentrate Loading Procedure prior to completing any further HPM shipments (if required) 4. 29 Metals to review parcel size and shed storage duration to ensure product conditioning is adequate to limit dust generation. Requirements to be included in revised Berth 4 Metal Concentrate Loading Procedure. 5. MWPA to investigate real time monitoring capability and alerts for metal concentrates 6. MWPA to review envirosuite database alerts to ensure all are functioning as required Was this non-compliance previously reported to DWER? X Yes, and Reported to DWER verbally Date: / Reported to DWER in writing Date: 14 / 06 / 2023 ICMS 70339

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. Section 3.2 Ambient environmental Date(s) of non-Condition no: quality monitoring (Table 3.2.1). 13/05/2023 compliance: Section 4.2 Reporting (Table 4.2.2) Details of non-compliance: MV IVS Knot was loaded with nickel concentrate during 13 – 15 May 2023, via rotainers on Berth 6. Air quality monitoring data recorded elevated nickel as TSP for the period 13 – 14 May 2023 (midday to midday). The high-volume (hivol) air sampler at Connell Road monitoring station recorded 0.29ug/m3, above the target level of 0.14ug/m3. 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 noncompliance took place. Short-term impact on air quality from nickel concentrate dust emissions. Cause (or suspected cause) of non-compliance: An ICAM investigation was undertaken which identified the following contributing factors: Product hang-up on the corners of the rotainers needs to be manually removed. Residual product not removed by manual sweeping has the potential to migrate outside the port via trucks exiting the port at Gate 3. The proximity of the Connell Road monitor to the truck circuit on Reg Clarke Road (and Gate 3), combined with the wind tunnelling effect under SE winds. The average moisture content was 8.00%, above the DEM level of 5.5%. Only 5 of the 127 total truckloads of nickel concentrate were found to have a moisture level below DEM (<4%). Product loaded below DEM may have contributed to dust emissions at the vessel hold for discrete periods while those rotainers were loaded. The rotainer tipping level was identified as potentially too high at times, creating less opportunity for the vessel hold misting system to provide containment. Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: The following corrective actions were identified: 1. Re-engineering of the rotabox tipping mechanism undertaken to prevent product carry back on trucks and eliminate the need for manual removal by operators. 2. A new hatch mounted dry fogging system will be installed for the next shipment. The new system will provide more extensive fog cover as well as finer fog droplet particles which should improve capture and containment of nickel concentrate dust. 3. An improved road sweeping regime to be implemented on future shipments. Was this non-compliance previously reported to DWER? Yes, and Reported to DWER verbally Date: / / 27 / 06 / 2023 Reported to DWER in writing Date:

Section E – Deta	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- Continuous Monitoring during Shiploading Event	Date(s) of non- compliance:	04/06/2023
Details of non-comp	oliance:		
	used the Port Way Realtime lime. The TEOM sampler was		_
What was the actua	al (or suspected) environmen	tal impact of the non-c	ompliance?
NOTE – please attac compliance took plac	h maps or diagrams to provide i e.	nsight into the precise lo	cation of where the non-
There is no suspec	ted environmental impact.		
Cause (or suspected	ed cause) of non-compliance:		
A power outage.			
Action taken to miti non-compliance:	gate any adverse effects of n	on-compliance and pro	event recurrence of the
N/A			
Was this non-compliance previously reported to DWER?			
⊠ Yes, and			
☐ Reported to	DWER verbally	Date: / /	
⊠ Reported to I	DIMED in comiting or	Date: 26/08/2023 in	n Q4 Air Quality

Section E – Deta	ils of Non-Compliance w	ith Licence Conditi	on
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:	Schedule 2	Date(s) of non- compliance:	23/06/2023
Details of non-comp	oliance:		
Road, Lemmon Roa	assigned sampler did not col ad, and Berth 1. The HiVol sa than the period specified in b	amplers continued to re	un, meaning the sample
What was the actua	al (or suspected) environmen	tal impact of the non-c	ompliance?
NOTE – please attack	h maps or diagrams to provide i e.	nsight into the precise lo	cation of where the non-
There is no expecte	ed environmental impact.		
Cause (or suspecte	ed cause) of non-compliance:		
Communication error between operators.			
Action taken to mitigate non-compliance:	gate any adverse effects of n	on-compliance and pr	event recurrence of the
Samples were collected and sent to be analysed to ensure there were no elevated levels during the period. A sampling communication whiteboard was installed to ensure the correct sampling is conducted when emails are not accessible.			
Was this non-compliance previously reported to DWER?			
⊠ Yes, and			
Reported to I	DWER verbally	Date: / /	
⊠ Reported to I	DWER in writing	Date: 26/08/2023 in Report	Q4 Air Quality Monitoring

Section F - Declaration

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

Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:	CEO	Position:	
Date:	28 August 2023	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.