



## 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:	L4432/1989/14	Licence file number:	DER2014/0000636-3~4
Licence holder name:	Pilbara Ports Authority		
Trading as:	Pilbara Ports		
ACN:	ABN 94987 448 870		
Registered business address:	The Esplanade, Port Hedland WA 6721		
Reporting period:	1 / July / 2023 to 30 / June / 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"><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
58, 58A	1,394,462

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	N/A

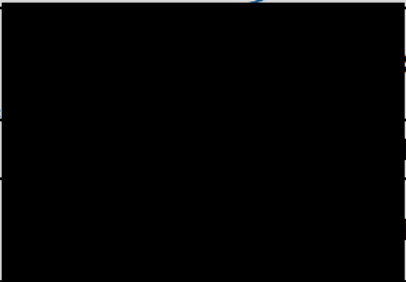
Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	14b	Date(s) of non-compliance:	14 October 2023
Details of non-compliance:			
Representative moisture content for bulk spodumene concentrate vessel <i>AAL Paris</i> was not received from the Premises User within 10 calendar days of the completion of its shipment. The moisture certificate was received two days late (due 14 October 2023; received 16 October 2023).			
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.			
The environmental impact of this non-compliance is considered to be negligible and administrative in nature.			
The product moisture results for this shipment were above the DEM.			
Dust samples collected from High Volume Air Samplers (HVAS) during ship-loading (2 October 2023) did not exceed the Reportable Event trigger value of 145 µg/m <sup>3</sup> .			
Cause (or suspected cause) of non-compliance:			
The cause of this non-compliance was an internal administrative error, where the Premise User did not provide the moisture certificate to Pilbara Ports within the required timeframe.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The Premise User advised that their internal processes have been amended to ensure moisture certificates are provided to Pilbara Ports within the required 10 calendar days from completion of its shipment. This will reduce the likelihood of non-compliances of this nature occurring in the future.			
Pilbara Ports continues to conduct weekly checks of product moisture data to enable any missing data to be picked up and reminders to be sent.			
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 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:	19	Date(s) of non-compliance:	See details below
Details of non-compliance:			
<p><b>Exceedances</b></p> <p>Three exceedances of particles as PM<sub>10</sub> and one exceedance of Copper (Cu) as PM<sub>10</sub> were recorded during the reporting period. The Reportable Event trigger value for Cu is &gt;1µg/m<sup>3</sup> and for particles is &gt;145µg/m<sup>3</sup></p> <ul style="list-style-type: none"> <li>29 August 2023 at M11 (combined 1 in 6 day sampling event and Copper concentrate shipment). Result: Cu 1.1 µg/m<sup>3</sup></li> <li>17 October 2023 at M11 (Spodumene shipment). Result: 190 µg/m<sup>3</sup></li> <li>8 January 2024 at M10 (1 in 6 day sampling event). Result 280 µg/m<sup>3</sup></li> <li>8 January 2024 at M11 (1 in 6 day sampling event). Result 340 µg/m<sup>3</sup></li> </ul> <p><b>Samples not collected from High Volume Air Sampler (HVAS)</b></p> <p>1 in 6 day sampling events</p> <ul style="list-style-type: none"> <li>5 August 2023 at M11 (ripped filter paper)</li> <li>3 November 2023 at M11 (equipment fault - cause unknown)</li> <li>6 June 2024 at M10 (human error) - Makeup sample conducted on 7 June 2024</li> <li>6 June 2024 at M11 (human error – Makeup sample conducted on 7 June 2024)</li> </ul> <p>Copper and Spodumene concentrate ship loading events</p> <ul style="list-style-type: none"> <li>18 September 2023 at M10 (human error)</li> <li>1 November 2023 at M11 (equipment fault - cause unknown)</li> <li>3 December 2023 at M11 (human error). This was a combined Copper concentrate shipment and 1 in 6 day sampling event</li> <li>22 April 2024 at M11 (human error). Makeup sample conducted on 25 April 2024</li> </ul> <p>The four exceedances of PM<sub>10</sub> mentioned above, and the HVAS sample that was not collected on 22 April 2024 were identified as part of Pilbara Ports' annual audit process, and therefore were not reported on in their respective quarterly reports as required under Condition 21 of the Licence.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p><b>Exceedances</b></p> <p>29 August 2023 (Cu as PM<sub>10</sub>) and 17 October 2023 (particles as PM<sub>10</sub>): Since the trigger value was only very slightly exceeded, and it was recorded at just the one HVAS monitoring station, the environmental impact is considered to be low and localised.</p> <p>8 January 2024 (particles as PM<sub>10</sub>): This exceedance was recorded at both HVAS stations and the results were 1.93 and 2.3 times higher than the trigger value (at M10 and M11 respectively). An exceedance of the Taplin Street monitor was also recorded on this date, and the investigation found that there were high regional dust levels on this day, and that Pilbara Ports was unlikely to be a significant contributor to this event. As a result, the environmental impact of this event is considered to be low. For more information on the investigation details, please refer to page 248 in Attachment F.</p>			

<b>Section E – Details of non-compliance with licence condition</b>
<p><b>Samples not collected from HVAS</b></p> <p>There was no actual or suspected environmental impact of this non-compliance as the non-compliance relates to environmental monitoring events which does not increase the risk of emissions or discharges.</p>
<p>Cause (or suspected cause) of non-compliance:</p>
<p><b>Exceedances</b></p> <p>29 August 2023: The Copper exceedance is likely to be attributable to a corresponding Copper concentrate shipment and the high wind speeds that occurred across the region on this day.</p> <p>17 October 2023: Although the dust exceedance correlated with a spodumene concentrate shipment, this is unlikely to be the cause of the exceedance as spodumene concentrate were outloaded via containers (also known as rotainer boxes) that is directly loaded (via tipping) into the ship's hold using a crane and Rotabox system. Based on an assessment of the wind speed and direction, it is likely that this dust originated from offsite sources.</p> <p>8 January 2024: The exceedance is likely to be attributable to the high dust levels that were recorded across the region. Exceedances at Taplin Street were also recorded on this day.</p> <p><b>Samples not collected from HVAS</b></p> <p>The causes of these non-compliances include:</p> <p>1 in 6 day sampling events</p> <ul style="list-style-type: none"> <li>▪ 5 August 2023 at M11 (ripped filter paper)</li> <li>▪ 3 November 2023 at M11 (equipment fault - cause unknown)</li> <li>▪ 6 June 2024 at M10 (human error)</li> <li>▪ 6 June 2024 at M11 (human error)</li> </ul> <p>Copper and Spodumene concentrate ship loading events</p> <ul style="list-style-type: none"> <li>▪ 18 September 2023 at M10 (human error)</li> <li>▪ 1 November 2023 at M11 (equipment fault - cause unknown)</li> <li>▪ 3 December 2023 at M11 (human error)</li> <li>▪ 22 April 2024 at M11 (human error)</li> </ul>
<p>Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:</p>
<p><b>Exceedances</b></p> <p>As the HVAS sampling requires the filter papers to be sent away for laboratory analysis, real-time dust exceedance identification and response cannot be implemented in association with this program. Pilbara Ports has a real-time dust monitoring program in place for this purpose.</p> <p><b>Samples not collected from HVAS</b></p> <p>Filters are collected as soon as possible after their run time to reduce the risk of damage after prolonged exposure to high wind speeds and the chance of being damaged.</p> <p>HVAS equipment is maintained and calibrated on a regular basis. There were no additional mitigation options available for rectifying these equipment faults.</p> <p>Internal processes and policies have been reinforced, and follow-up samples were undertaken where possible to account for missed sampling events.</p>



Section E – Details of non-compliance with licence condition	
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: 2023/2024 Q1 Dust report 30 October 2023 2023/2024 Q2 Dust report 31 January 2024 2023/2024 Q4 Dust report 26 July 2024

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:		Position:	
Date:	26 September 2024	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.