



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

Section A – Licence Details

Licence number:	L4503/1975/14	Licence file number:	DER2013/000901
Licence holder name:	BHP Iron Ore Pty Ltd		
Trading as:	BHP Iron Ore Pty Ltd		
ACN:	008 700 981		
Registered business address:	Level 1, City Square Brookfield Place 125 St Georges Terrace PERTH WA 6000		
Reporting period:	01/07/2023 to 30/06/2024		

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)

☐ 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 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
5 – Processing or beneficiation of metallic or non-metallic ore	75.4 Mt
54 – Sewage facility	26.53 m ³ /day
61 – Liquid waste facility	0 t
64 – Class II putrescible landfill site	4,027.9 t (inert I and II waste only)
73 – Bulk storage of chemicals etc.	11,670 m ³ fuel storage

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
6 – Mine dewatering	2.72 MT

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:	32, Table 8	Date(s) of non-compliance:	31/12/2023
Details of non-compliance:			
The Hub Turkey's nest (WBSW187) flowmeter was discovered to be damaged and not recording the volumes of water being discharged out of the area from July to December FY2024.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>The non-compliance has no known or suspected environmental impact.</p> 			
Cause (or suspected cause) of non-compliance:			
Equipment fault/damage and administration error. The flowmeter battery had failed, the flow sensor was not reading correctly and the isolation valve did not close 100%.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Area owner was notified and notification was raised to have the parts ordered and flowmeter repaired.			
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:	12, Table 3	Date(s) of non-compliance:	10 October 2023
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Details of non-compliance:

The AT796 weather station not reporting the data required in the Whaleback licence.

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 non-compliance has no known or suspected environmental impact.



Cause (or suspected cause) of non-compliance:

Equipment failure.

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

Issue has been communicated to relevant teams. Repair costs have been obtained and assessed. Installation of a new wind sensor with the remaining sensors and communication equipment is in progress.

Was this non-compliance previously reported to DWER?

☐ 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:	3	Date(s) of non-compliance:	30 September 2023
Details of non-compliance:			
Below performance target (90%) availability and utilisation for dust equipment for BOOM sprays (86.67%) for the month of September, as per quarterly reporting requirements Licence L4503/1975/14 at Mt Whaleback Fixed Plant.			
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 were three dust exceedance events in September, all were investigated and assessed as being BHP contributable. The non-compliance has no known or suspected environmental impact.			
Cause (or suspected cause) of non-compliance:			
Equipment failure. Insufficient daily checks & controls faulting without identification causing spray to remain on off position.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Practical Problem Solving engagement session completed 31 December 2023 to determine gap closing actions. Implemented process for IROC to reset all COS Sprays to 'Auto' at shift change (prevents leaving items in incorrect modes).			
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: 29/12/2022	

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, Table 15	Date(s) of non-compliance:	01 July 2023
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Details of non-compliance:

The Mt Whaleback OB29 bioremediation facility cell liner does not meet the permeability requirements of $\leq 10^{-9}$ m/s.

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.

As the Mt Whaleback bioremediation area is located within the OB29 and is above natural ground level, the non-compliance has no known or suspected environmental impact.



Cause (or suspected cause) of non-compliance:

Bio-remediation facility does not meet design specifications.

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

A Landfarm Compliance project is underway which is designing a new facility at a centralised location in Whaleback.

Engagement of engineering service consultant to review and develop design and landfarm practice under Landfarm Compliance project.

The bioremediation facility operational procedure is in the process of being updated.

Was this non-compliance previously reported to DWER?

☒ Yes, and

☒ Reported to DWER verbally

Date 02/08/2023

☐ 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:	2, Table 15	Date(s) of non-compliance:	28/01/2024
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Details of non-compliance:

During an inspection it was found the Hub Biomax had faulted causing approximately 200 Litres of effluent to overflow onto the ground.

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 non-compliance has no known or suspected environmental impact.



Cause (or suspected cause) of non-compliance:

Equipment failure.

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

Reset pump breaker, pump was faulty. Waste management contractor drained the tanks and replaced the pump on 29/02/24.

Was this non-compliance previously reported to DWER?

☐ 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:	34, Table 9	Date(s) of non-compliance:	25/11/2023
Details of non-compliance:			
Q2 Missed Sampling for bores WBGW009 and WBGW011. WBGW009 was windrowed off due to road safety issues including scouring and erosion. WBGW011 was windrowed off, no safe access for SGS to do sampling, vegetation around the bore was covering the bore signage.			
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 non-compliance has no known or suspected environmental impact.			
Cause (or suspected cause) of non-compliance:			
Safety issues restricted access.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Raised notification to get the windrow removed as break down work to civils, raised notification to remove the overgrown vegetation at sample point WBGW011. Searched out for alternative route to access sample point WBGW009. Initiate monthly meetings with SGS contractors to improve managing our monitoring points and prevent reoccurrence of access issues.			
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:	34, Table 9	Date(s) of non-compliance:	30/06/2024
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Details of non-compliance:

Buried groundwater monitoring bore. Unable to sample due to damaged purging cord and PVC pipe.

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 non-compliance has no known or suspected environmental impact.



Cause (or suspected cause) of non-compliance:

Equipment damage. Evidence suggests that the bore casing had deteriorated and collapsed.

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

Reviewing planning options to have the bore reinstated.

Was this non-compliance previously reported to DWER?

☐ 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:	3	Date(s) of non-compliance:	31 March 2024
Details of non-compliance:			
Below performance target (90%) availability & utilisation for dust equipment for BOOM sprays (88.28%) for the month of March 2024, as per quarterly reporting requirements Licence L4503/1975/14 at Mt Whaleback Fixed Plant.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>There were zero dust exceedance events in March. The non-compliance has no known or suspected environmental impact.</p>			
Cause (or suspected cause) of non-compliance:			
Sprays were turned off due to wet weather and elevated ore moisture content, however, human error led to incorrect coding causing sprays to remain in maintenance mode.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Investigation completed 31 July 2024 to determine gap closing actions. Resolve mode selection in OHP5. Communicate critical alert to IROC controllers to ensure handovers in P2 include details where maintenance mode is selected. Adjust colour coding in P2 to determine compliance /non-compliance.			
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:	30 (e)	Date(s) of non-compliance:	30 September 2023
Details of non-compliance:			
No pH reading in Q1 at WBDMPRO001, required quarterly.			
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 non-compliance has no known or suspected 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:			
Verified lab data to confirm no pH recorded. Updated Chain of Custody with sampling contractor to confirm pH is required quarterly.			
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:	3	Date(s) of non-compliance:	1 February 2024
Details of non-compliance:			
OHP 5 ROM bin sprays were broken during an inspection by the DWER. This was in non-compliance to Table 14 (2) in the licence, which states that OHP5 Primary Crusher ROM bin hopper spray needs to be operating when transporting iron ore, unless during exclusion periods. A period of 21 days was given to rectify the broken sprays, which was exceeded.			
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.			
Potentially elevated dust emissions. No exceedance of 24hr dust target during this period. The non-compliance has no known or suspected environmental impact.			
Cause (or suspected cause) of non-compliance:			
OHP 5 ROM bin sprays were not operable.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
03/02/2024 - Sprays installed 20/03/2024 - Functionality configured to measure on/off 14/04/2024 - Functionality configured to measure required time and on/off			
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:	Schedule 5	Date(s) of non-compliance:	13 February 2024
Details of non-compliance:			
FY2024 Q2 Quarterly Dust report had not been received by the DWER by 14 February 2024 as required under Schedule 5 of the L4503/1975/19 (MWB) and L6942/1997/13 (ER) licenses.			
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 non-compliance has no known or suspected environmental impact.			
Cause (or suspected cause) of non-compliance:			
Administrative error. File size was too large for the DWER email system to accept.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Have responded to DWER and sent them report and data. In future, will send in small batches and confirm with DWER that they have received it.			
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:	Table 15, No: 8	Date(s) of non-compliance:	30 June 2024
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Details of non-compliance:

Whaleback ARD dam is non-compliant to L4503/1975/14 Table 15 Number 8, as the integrity of the containment infrastructure has not been maintained.

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.

Minor salt scaring visible within the lease boundary. Potential impact to vegetation in downstream locations within the lease boundary.



Cause (or suspected cause) of non-compliance:

Liner integrity compromised due to desiccation of clay, ongoing seepage through foundation of the facility.

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

Completion of impermeable liner installed in Cell 2 & 3. Future planned lining of Cells 1, 4 & 5.

Was this non-compliance previously reported to DWER?

☐ Yes, and

☐ Reported to DWER verbally

Date: / /

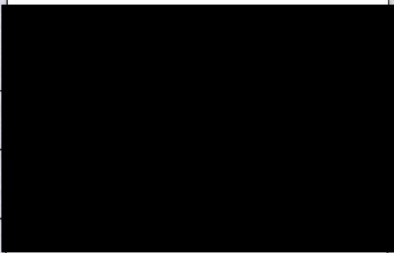
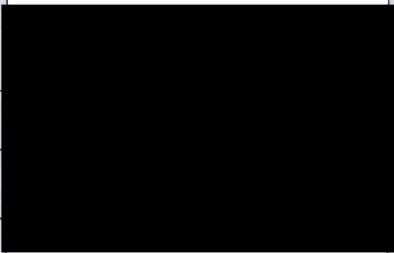
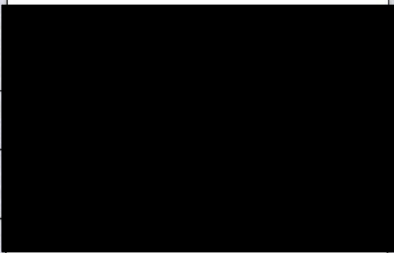
☐ Reported to DWER in writing

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.

Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:	26/09/2024	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.