



Annual Audit Compliance Report Form


Environmental Protection Act 1986, Part V Division 3

Section A – Licence details			
Licence number:	L4513/1969/18	Licence file number:	DER2013/001083
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:	01/07/2024 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">• 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 in 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	73.57 Mt
54 – Sewage facility	0.148 m ³ average per day 54.0 m ³ in reporting period
58 – Bulk material loading or unloading	288.59 Mt
61 – Liquid waste facility	7,592.1 t
62 – Solid waste depot	27,542.5 t
73 – Bulk storage of chemicals etc.	63,316.8 m ³ in aggregate

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
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:	1 & Table 14	Date(s) of non-compliance:	September 2024 – June 2025
Details of non-compliance:			
<p>In June 2025 it was identified that a partially bunded unlined evaporation area was being utilised to store potentially contaminated slurry. The slurry was composed of soil material from a nearby excavation area mixed with potable water during hydro-excavation activities. The slurry was stored in the evaporation area to be dried and reused on site within the original excavation area. The potentially contaminated water infiltration discharge is not listed as an authorised emission under Condition 1. The unlined evaporation area is also not an approved part of waste material management infrastructure described in Table 14.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <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. No runoff or discharge to nearby drainage lines was identified. No dried by-product material was used as fill elsewhere on site.</p>			
			
Cause (or suspected cause) of non-compliance:			
Construction and operation of an unauthorised unlined evaporation area to store and manage potentially contaminated slurry by-product under the Port Part V Licence.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Discharging of potholing material in the area was discontinued.			
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: 	



Annual Audit Compliance Report Form


Environmental Protection Act 1986, Part V Division 3

Section A – Licence Details			
Licence number:	5611/1993/11	Licence file number:	DER2014/001167
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:	01/07/2024 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 checked="" 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 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
5 – Processing or beneficiation of metallic or non-metallic ore	0 Mtpa
63 – Class I inert landfill site	8 t
64 – Class II putrescible landfill site	24.6 t
85 – Sewage facility	1,988 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
6 – Mine dewatering	0

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	Date(s) of non-compliance:	12 March 2025 – 9 April 2025
Details of non-compliance:			
<p>A 16.5 m³ lined waste storage pond (Waste Storage Pond) was constructed and operated to store soil and water slurry waste generated from horizontal drilling that intersected the groundwater. The Waste Storage Pond was constructed adjacent to the approved Contaminated Soil Handling Area runoff collection pond (Runoff Pond) and connected to the Runoff Pond via a lined channel, which was ultimately connected to the Water Treatment Plant via a stand-by pump with high- and low-level switches. This was not an approved piece of 'infrastructure' as outlined in Table 10 or 'waste material management infrastructure' as outlined in Table 14.</p>			
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. The Waste Storage Pond was constructed in a previously disturbed area and was constructed to the same specifications as the approved Runoff Pond, using a GCL liner and overlain by 1.5 mm HDPE liner. The operation history of the pump associated with the Runoff Pond confirmed no material had been pumped from the Runoff Pond to the Water Treatment Plant. Therefore, no discharge to the environment occurred from the Waste Storage Pond.</p>			
			
Cause (or suspected cause) of non-compliance:			
Construction and operation of an unauthorised lined Waste Storage Pond under the Port Part V Licence.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>On 9 April 2025, waste disposal into the Waste Storage Pond was ceased and the pond was isolated by closing off the channel that connected it to the Runoff Pond. Sediment samples were taken of the waste within the Pond; the material was classified in accordance with the <i>Landfill Waste Classification and Waste Definitions 1996</i> guideline and taken for disposal to a licensed facility. The Waste Storage Pond was decommissioned, the area was reinstated to its original condition.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DWER verbally		Date: 17 April 2025	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 17 April 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:	19	Date(s) of non-compliance:	October and November 2024, and June 2025
Details of non-compliance:			
For October and November 2024, and June 2025 the 90% Average Monthly Availability rate for fogging units was not achieved.			
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. Throughout FY2025, the Licence Holder achieved a moisture content above Dust Extinction Moisture (DEM) for 90% for all ore in-loaded (except for June 2025) and all ore out-loaded at the premises.			
Air quality exceedance events at the boundary air quality monitors during these months were reported to DWER in quarterly reports, as required under the licence. Upon completion of an investigation for each of the dust exceedance events, fogging unit availability was not considered as a significant contributing factor. No impact to dust suppression effectiveness was observed as a result of this reduced availability.			
Cause (or suspected cause) of non-compliance:			
The reduced availability of fogging units was attributed to the Dust Control Validation study completed as a requirement of Condition 15(a) after the submission of the Stage 1A Environmental Compliance Report. The monitoring campaign required the fog equipment to be turned on and off during operational periods to ascertain abatement effectiveness.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Prior to the start of the validation study in October 2024 and after the completion of the validation study in November 2024, fogging unit availability remained compliant therefore no mitigation actions were required.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: <input type="text"/>	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 31 January 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:	19	Date(s) of non-compliance:	January 2025
Details of non-compliance:			
In January 2025 the 90% Average Monthly Availability rate for belt wash stations was not achieved.			
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.			
<p>The non-compliance has no known or suspected environmental impact. Throughout FY2025, the Licence Holder achieved a moisture content above Dust Extinction Moisture (DEM) for 90% for all ore in-loaded (except for June 2025) and all ore out-loaded at the premises.</p> <p>There were no air quality exceedance events at the boundary or ambient air quality monitors during the month of January 2025, therefore belt wash station availability was not considered to be a significant factor affecting environmental outcomes or impacts. No impact to dust suppression effectiveness was observed as a result of this reduced availability.</p>			
Cause (or suspected cause) of non-compliance:			
The reduced availability of belt wash stations was attributed to the lack of availability of spare parts for associated infrastructure (sump pumps). As their operation is interlocked to belt wash stations, this impacted overall utilisation.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A review of spares held, and relevant lead times was undertaken in order to improve availability of spare parts.			
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: 30 April 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:	19	Date(s) of non-compliance:	February 2025
Details of non-compliance:			
In February 2025 the 90% Average Monthly Availability rate for bulk ore conditioning sprays was not achieved.			
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.			
<p>The non-compliance has no known or suspected environmental impact. Throughout FY2025, the Licence Holder achieved a moisture content above Dust Extinction Moisture (DEM) for 90% for all ore in-loaded (except for June 2025) and all ore out-loaded at the premises.</p> <p>Air quality exceedance events at the boundary air quality monitors and the ambient air quality monitor during these months were reported to DWER in quarterly reports, as required under the licence. Upon completion of an investigation for each of the dust exceedance events, bulk ore conditioning spray availability was not considered as a significant contributing factor. No impact to dust suppression effectiveness was observed as a result of this reduced availability.</p>			
Cause (or suspected cause) of non-compliance:			
The reported reduced availability of bulk ore conditioning sprays was attributed to tropical storm Zelia, resulting in wet ore presenting at Port car dumpers. Excessively wet product is harder to process, therefore the decision was made not to operate the bulk ore conditioning sprays to reduce the probability of significant material handling issues during the cyclone period.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
There were no adverse effects resulting from this non-compliance. Bulk ore conditioning sprays were reinstated to normal operation once the excessive rainfall ceased.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: <input style="width: 50px;" type="text"/>	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 30 April 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:	23(d)	Date(s) of non-compliance:	July 2024 – June 2025
Details of non-compliance:			
<p>Condition 23 of L4513/1969/18 states that continuous (meaning a data recovery rate of above 90% averaged annually) Moisture Content monitoring will be undertaken at specified locations. For one of the locations, Car Dumper 4 (CD4), the data recovery rate requirement was not met.</p> <p>Air quality exceedance events at the boundary air quality monitors during these months were reported to DWER in quarterly reports, as required under the licence. Upon completion of an investigation for each of the dust exceedance events, Moisture Analyser availability was not considered as a significant contributing factor.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <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. Throughout FY2025, the Licence Holder achieved a moisture content above Dust Extinction Moisture (DEM) for 90% for all ore in-loaded (except for June 2025) and all ore out-loaded at the premises.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The CD4 reduced data recovery rate was attributed to surging ore covering the near infrared (NIR) sensor at Car Dumper 4 causing signal disruptions.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>A new NIR cradle, which raises the height of the NIR, was installed at CD4 in April 2025 to assist with product surging and obscuring the sensor. Since this installation, product surging has not been an issue.</p>			
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: 30 April 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:	June 2025
Details of non-compliance:			
Condition 25 of L4513/1969/18 states that 90% of all in-loaded ore at the premises has a moisture content at or above the corresponding DEM level. For June 2025, the condition was not met.			
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. Air quality exceedance events at the boundary air quality monitors during these months were reported to DWER in quarterly reports, as required under the licence. Upon completion of an investigation for each of the dust exceedance events, the ore moisture content of 82.99 % was not considered a significant contributing factor.			
Cause (or suspected cause) of non-compliance:			
The CD2 NIR sensor was dirty which affected data quality, impacting the moisture readings and DEM compliance.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The moisture analyser was inspected and cleaned. Further investigation for improvement is underway.			
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:	26(d)	Date(s) of non-compliance:	July 2024 – June 2025
Details of non-compliance:			
Condition 26 of L4513/1969/18 states that continuous (meaning a data recovery rate of above 90% averaged annually) air quality monitoring will be undertaken at specified locations. For F Berth monitoring station, the data recovery rate requirement was not met.			
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. Air quality exceedance events at the boundary air quality monitors during these months were reported to DWER in quarterly reports, as required under the licence. Upon completion of an investigation for each of the dust exceedance events, F Berth monitoring station availability was not considered as a significant contributing factor.			
Cause (or suspected cause) of non-compliance:			
The F Berth monitoring station reduced data recovery rate was attributed to two cyclone shutdowns and multiple equipment faults caused by power interruptions with dust build up on solar panels.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
New equipment including solar panels and batteries were installed at F Berth in February and March 2025 and the solar panel cleaning regime was increased from once to twice weekly.			
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: 30 April 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:	26(d)	Date(s) of non-compliance:	July 2024 – June 2025
Details of non-compliance:			
Condition 26 of L4513/1969/18 states that continuous (meaning a data recovery rate of above 90% averaged annually) air quality monitoring will be undertaken at specified locations. For FI West monitoring station, the data recovery rate requirement was not met.			
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. Air quality exceedance events at the boundary air quality monitors during these months were reported to DWER in quarterly reports, as required under the licence. Upon completion of an investigation for each of the dust exceedance events, FI West monitoring station availability was not considered as a significant contributing factor.			
Cause (or suspected cause) of non-compliance:			
The FI West monitoring station reduced data recovery rate was attributed to two cyclone shutdowns as well as localised flooding post events which restricted access to service and fault fix monitor.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
No actions taken to mitigate. Access has since been restored.			
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: 30 April 2025	

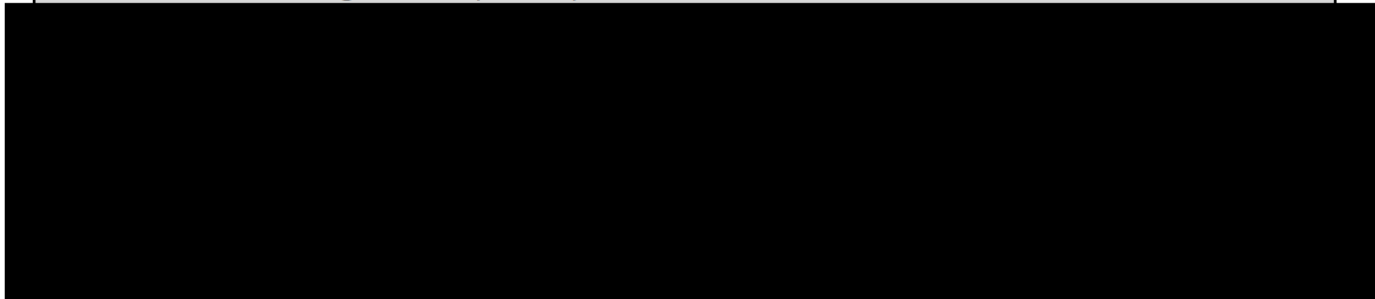
Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	35(b)	Date(s) of non-compliance:	December 2024 – June 2025
Details of non-compliance:			
Condition 35 of L4513/1969/18 states that samples must be taken and analysed for the parameters specified in Column 2 of Table 6. Parameters for L7 (daily) were missed on several occasions. Parameters for L7 (weekly) were missed on two sperate occasions. parameters for L9 (fortnightly) were missed on three sperate occasions. Please see the compliance report against L4513 for more information.			
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. Subsequent sampling indicated that no environmental impact was likely to have occurred from the missed samples as no elevated levels were recorded.			
Cause (or suspected cause) of non-compliance:			
Total titratable acidity and total alkalinity were missed for L7 (daily) on several occasions due to running out of titrant solution and delayed delivery. Total iron and halogenated aromatics were missed for L7 (weekly) on two occasions due to smaller samples taken and the main contaminants of concern being prioritised. Field parameters such as turbidity (11 December 2024), electrical conductivity (9 January 2025) and redox potential (31 March 2025) were missed for L9 (fortnightly) for unknown reasons.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A back up store of titrant solution was kept on site to prevent future occurrences.			
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:	36	Date(s) of non-compliance:	11 February 2025
Details of non-compliance:			
Following the commissioning of the Water Treatment Plant (Table 10, item 4), a water sample collected on 11 February 2025 from the L7 discharge point exceeded the PFOS limit of 0.02 µg/L as specified in Column 4 of Table 6, with a recorded level of 0.031 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.			
The non-compliance has no known or suspected environmental impact. On the 11 February 2025, the day the PFOS exceedance was identified, the Water Treatment Plant discharge to Lagoon 1 ceased in preparation for Cyclone Zelia therefore minimal non-compliant water was discharged. Subsequent samples taken from L7 and downstream locations (L6, L8 and L9) did not report elevated concentrations of PFOS.			
Cause (or suspected cause) of non-compliance:			
The identified cause of the non-compliance was an increase in hydrocarbon and benzene in the Turkey Nest Dam prior to the PFOS exceedance occurring and the oily water separator was not operational until 11 February 2025. The increased hydrocarbon and benzene concentrations caused a breakthrough of PFOS in the stage 2 and 3 filtering system, resulting in an exceedance of the criteria from L7 discharge point with no early detection within the system noted.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Following the non-compliance, discharges from L7 discharge point ceased and daily testing was conducted of Lagoon 1 to monitor compliance and compare to historical records. Additional testing was also conducted on the inlet and outlet water from the Water Treatment Plant to confirm no further exceedances against monitoring criteria. The overall flow rate of the system was reduced, to account for the turnaround time of results from the lab so that any exceedances would be reported prior to discharge to environment. The oily water separator commenced operation on 11 February 2025 and additional filter media were made available to facilitate an efficient media changeover if required.			
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 particular¹.

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



Date:	10/09/2025	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.