



## Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

### Section A – Licence details

|                              |  |                      |                 |
|------------------------------|--|----------------------|-----------------|
| Licence number:              | L5415/1988/9   | Licence file number: | DER2013/00900 1 |
| 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<br>125 St Georges Terrace<br>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 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 | 66,172,578 t                      |
| 12 – Screening etc. of material                                 | 249,161 t                         |
| 54 – Sewage facility  | 17 m <sup>3</sup> /day            |
| 64 – Class II putrescible landfill site                         | 478 t                             |
| 73 – Bulk storage of chemicals                                  | 2,800 m <sup>3</sup> 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 |
|------------------------------|--|
| 6 - Mine dewatering          | 22.96 GL                               |

# Section E – Details of non-compliance with licence condition

Please use a separate page for each condition with which the license holder was non-compliant at a time during the reporting period.

|               |                       |                            |        |
|---------------|-----------------------|----------------------------|--------|
| Condition no: | Condition 9 (Table 4) | Date(s) of non-compliance: | FY2024 |
|---------------|-----------------------|----------------------------|--------|

Details of non-compliance:

The Jimblebar biofarm is non-compliant against the following Part V license conditions:

- 1.5 mm HDPE liner to achieve a permeability of  $<10^{-9}$  m/s
- The wet cell is lined for a runoff cell and has been used to accept hydrocarbon contaminated waste

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 known actual or suspected environmental impact as a result of the non-compliance.



Cause (or suspected cause) of non-compliance:

BHP has identified that the biofarm facility management requires improvement to ensure hydrocarbon contaminated soil, hydrocarbon contaminated water and nutrient rich wastewater from the Ammonium Nitrate Facility are managed appropriately.

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

BHP is currently undertaking an investigation into the management of the biofarm facility. During FY2024, no further liquid waste has been disposed of in the bioremediation facility. Hydrocarbon sampling has been completed for the hydrocarbon contaminated soil in the dry cells and turning of the soil to break down hydrocarbons to below NEPM guideline limits is underway.

Was this non-compliance previously reported to DWER?

☒ Yes, reported in writing to DWER

☐ Reported to DWER verbally

Date:

☒ Reported to DWER in writing

Date: FY2023 AER

### Section E – Details of non-compliance with licence condition

Please use a separate page for each condition with which the license holder was non-compliant at a time during the reporting period.

|               |                         |                            |            |
|---------------|-------------------------|----------------------------|------------|
| Condition no: | Condition 29 (Table 16) | Date(s) of non-compliance: | 30/01/2024 |
|---------------|-------------------------|----------------------------|------------|

Details of non-compliance:

Quarterly monitoring of creek line water quality parameters was not completed as required at six monitoring sites during Q3 of FY2024. Following a high rainfall event all six monitoring sites were damaged and/or destroyed and water samples were unable to be retrieved.

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 known actual or suspected environmental impact from not monitoring the six monitoring sites as there have been no further large rain events causing flow conditions.



Cause (or suspected cause) of non-compliance:

A high rainfall event caused all six newly installed rising stage samplers to be destroyed and/or washed away. Over the course of 48 hours (24 to 25 January 2024), 174.9 mm was received (BoM, Newman Airport).

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

New rising stage sampler designs are being investigated to be installed in Q1 of FY2025.

Was this non-compliance previously reported to DWER?

☐ Yes, reported in writing to DWER

☐ 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 license holder was non-compliant at a time during the reporting period.

|               |                 |                            |            |
|---------------|-----------------|----------------------------|------------|
| Condition no: | Condition 3.5.1 | Date(s) of non-compliance: | 30/09/2023 |
|---------------|-----------------|----------------------------|------------|

Details of non-compliance:

Monitoring bore HMG0111M1 was not sampled for monthly groundwater depth (mbgl) in September 2023 as required by Condition 3.5.1 (Table 3.5.1 in the superseded license prior to the February 2024 License Amendment).

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 was no known actual or suspected environmental impact for not recording the groundwater level for HMG0111M1 for September 2023. The bore was dipped on 06/10/2023 with a depth of 51.95 mbgl, demonstrating no mounding occurred.



Cause (or suspected cause) of non-compliance:

The monthly dip data couldn't be retrieved for September due to a failure of the bore telemetry equipment. Following the non-compliance, the bore was removed from the license and substituted with HMG0131M.

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

The telemetry was replaced, data was retrieved for October 2023 and a manual dip was completed.

Was this non-compliance previously reported to DWER?

☐ Yes, reported in writing to DWER

☐ 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 license holder was non-compliant at a time during the reporting period.

|               |                 |                            |           |
|---------------|-----------------|----------------------------|-----------|
| Condition no: | Condition 3.6.1 | Date(s) of non-compliance: | Q1 FY2024 |
|---------------|-----------------|----------------------------|-----------|

Details of non-compliance:

The L1 Jimblebar Oily Wastewater Treatment Plant (JBDMOWW007) monitoring point exceeded the Total Recoverable Hydrocarbons (TRH) licence limit of 15 mg/L for Q1 of FY2024. The treated oily wastewater is used for dust suppression on site and is sampled quarterly as per license requirements.

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 was no known actual or suspected environmental impact from the TRH limit exceedance in FY2024. The L1 outflow line discharges to the South Jimblebar turkey's nest and is significantly diluted with raw dewatering water before being used for dust suppression. Monthly TRH samples of the South Jimblebar turkey's nest confirmed that the TRH did not exceed the 15 mg/L limit and therefore was used for dust suppression.



Cause (or suspected cause) of non-compliance:

The sample point was no longer an accurate reflection of the water being used for dust suppression as the standpipe for the water trucks is now located at the South Jimblebar turkey's nest.

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

A License Amendment (issued on 13/02/2024) updated the license point to the South Jimblebar turkey's nest to accurately represent the water being used for dust suppression. There was no exceedance of TRH at SJTN001 in the FY2024 reporting period.

Was this non-compliance previously reported to DWER?

☒ Yes, reported in writing to DWER

☐ Reported to DWER verbally

Date:

☒ Reported to DWER in writing

Date: 23/05/2023 (ID 0074190)

### Section E – Details of non-compliance with licence condition

Please use a separate page for each condition with which the license holder was non-compliant at a time during the reporting period.

|               |                               |                            |            |
|---------------|-------------------------------|----------------------------|------------|
| Condition no: | Condition 3.3.1 (Table 3.3.1) | Date(s) of non-compliance: | 30/09/2023 |
|---------------|-------------------------------|----------------------------|------------|

Details of non-compliance:

The reinjection bore HEOP0847P was not monitored for Q1 for groundwater quality parameters as required by Condition 3.3.1 (Table 3.3.1).

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 was no known actual or suspected environmental impact from not sampling during this quarter. The adjacent ambient monitoring bore (HEOP0842M) was sampled in Q1 and did not show any notable changes in water quality trends in comparison to historical water quality.



Cause (or suspected cause) of non-compliance:

Reinjection only occurred during the first six days of Q1. The hydrochemistry sample was unable to be taken as there was no further reinjection occurring for the water sample to be taken.

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

N/A

Was this non-compliance previously reported to DWER?

☐ Yes, reported in writing to DWER

☐ 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 license holder was non-compliant at a time during the reporting period.

|               |                 |                            |                         |
|---------------|-----------------|----------------------------|-------------------------|
| Condition no: | Condition 3.3.1 | Date(s) of non-compliance: | 01/07/2023 – 31/01/2024 |
|---------------|-----------------|----------------------------|-------------------------|

**Details of non-compliance:**

Monthly flow rate and cumulative volume data for OB18 MAR groundwater monitoring bores (HEOP0828M and HEOP0838M) were unable to be recorded for FY2024 as these parameters cannot be obtained for monitoring bores. A technical error in the license amendment granted on 17 March 2022 included a DWER-triggered change to the license to undertake monthly flow rate and cumulative volume monitoring for the two bores (Table 3.3.1).

During the July 2022 Licence Amendment, BHP requested these erroneous monitoring requirements be removed, however DWER advised that *'the removal of the bores would require a review of the risk assessment and advice from the Department's Hydrogeologist, which was not undertaken during the assessment of the current Licence Amendment'*, therefore the monitoring requirement remained in the License, leading to the non-compliance.

**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 was no known actual or suspected environmental impact as flow rate and cumulative volume data readings are not able to be recorded for monitoring bores.

| Monitoring Bore ID | Easting    | Northing    |
|--------------------|------------|-------------|
| HEOP0828M          | 803242.833 | 7416363.742 |
| HEOP0838M          | 805188.354 | 7415770.612 |

**Cause (or suspected cause) of non-compliance:**

The cause of the non-compliance is an administrative error during the License Amendment process.

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

A License Amendment was completed on 13/02/2024. As part of this the monitoring requirements for bores HEOP0828M and HEOP0838M were removed.

**Was this non-compliance previously reported to DWER?**

☒ Yes, reported in writing to DWER

☐ Reported to DWER verbally

Date:

☒ Reported to DWER in writing

Date: 12/04/2022



### Section E – Details of non-compliance with licence condition

Please use a separate page for each condition with which the license holder was non-compliant at a time during the reporting period.

|               |                     |                            |        |
|---------------|---------------------|----------------------------|--------|
| Condition no: | Condition 26 and 27 | Date(s) of non-compliance: | FY2024 |
|---------------|---------------------|----------------------------|--------|

Details of non-compliance:

Caramulla surplus water scheme (FJB0016) quarterly monitoring of Total Suspended Solids (TSS) was not monitored for FY2024 reporting period. Quarterly monitoring of TSS is required when discharge and reinjection is occurring. There was discharge and reinjection recorded for the whole FY2024 reporting period.

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 was no known actual or suspected environmental impact from not sampling during this quarter.



Cause (or suspected cause) of non-compliance:

Administrative error, the parameter was missed off the chain of custody for sampling.

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

The run sheets were updated and TSS monitoring will be captured for the FY2025 reporting period.

Was this non-compliance previously reported to DWER?

☐ Yes, reported in writing to DWER

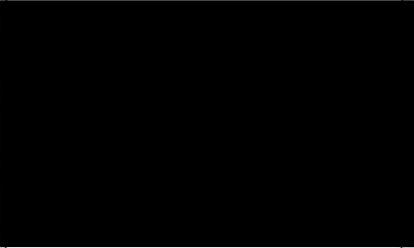
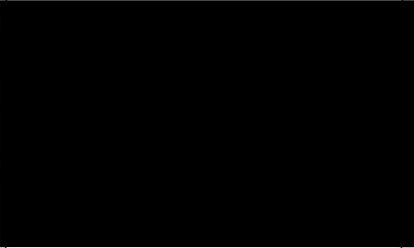
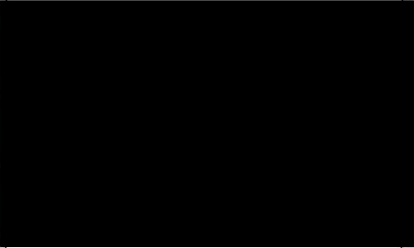
☐ Reported to DWER verbally

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 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:   | 26/09/2024  | 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.