



# Annual Audit Compliance Report

*Environmental Protection Act 1986, Part V Division 3*

Section A – Licence Details			
Licence number:	L8437/2010/3	Licence file number:	2012/000069-1~2
Licence holder name:	BHP Nickel West Pty Ltd		
Trading as:	BHP Nickel West		
ACN:	004 184 598		
Registered business address:	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"><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
Category 12: Screening etc. of material	18,421 tonnes nickel matte milled
Category 31: Chemical manufacturing	322.44 tonnes of hydrogen sulphide gas
	318 tonnes of nickel sulphate
Category 34: Oil or gas refining	681.129 tonnes of Hydrogen Gas
Category 44: Metal smelting or refining	11,900 tonnes of nickel metal
Category 62: Solid waste depot	3,823.86 tonnes of residue (dry)
Category 67: Fuel burning	4,178.62 of natural gas per hour

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

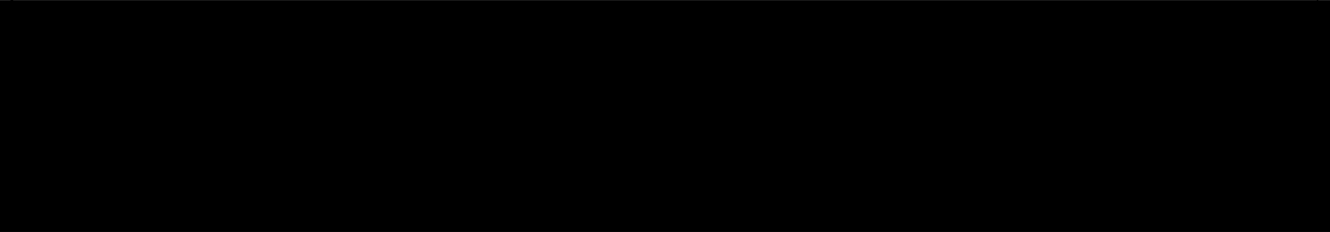
Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	37	Date(s) of non-compliance:	15/12/2024
Details of non-compliance:			
<p><i>Condition 37 The Licence Holder must install and commission the infrastructure listed in Table 5, in accordance with (i) the corresponding design and operational requirements; and (ii) at the corresponding infrastructure location; as set out in Table 5.</i></p> <p>Windsock was not installed as per Condition 37, Table 5.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<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>No actual or suspected environmental impact from this non-compliance. A centralised weather station was operational whilst sprinklers and Pitt Boss were in operation, to manage Pit Boss start up and shutdowns based on set parameters. As such the windsock was not required for Pit Boss management and therefore was not installed. Sprinklers and Pitt Boss have been removed due to W6882/2024/1 Evaporation Cell Relining Project and as such spray drift during high wind events is no longer a risk of impacting vegetation surrounding the facility.</p>			
Cause (or suspected cause) of non-compliance:			
Centralised weather station was installed and as such the requirement to install a windsock was overlooked given wind direction was monitored using the weather station.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Upon notification of non-compliance with Condition 37 via DWER correspondence dated 25 March 2025, a windsock was installed within 30 days as per request.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> No			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER		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:	39 (ii)	Date(s) of non-compliance:	15/12/2024
Details of non-compliance:			
<p><i>Condition 39: The Licence Holder is required to:</i></p> <p style="padding-left: 20px;"><i>ii) undertake daily inspections of the above ground effluent pipelines, pumps and valves, where accessible for leaks, spills and ruptures.</i></p> <p>Daily visual inspections of above ground pipelines, pumps and valves for leaks, spills or ruptures was not carried out.</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>No actual or suspected environmental impact from this non-compliance.</p> <p>Due to presence of a substantial work force at the site during the Evaporation Cell relining works, any visual leaks or ruptures would have been identified quickly, along with the continuous leak detection system alarming PCC operators if there was a potential issue. As such the risk of ruptures, spills or leaks being undetected for a time where substantial discharge could occur was minimal.</p>			
Cause (or suspected cause) of non-compliance:			
Demobilisation of permanent site-based technicians who had previously carried out these inspections as daily task. Daily inspection routines at Baldvis were not embedded within work instructions for the remaining workforce present during temporary suspension of operations.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Daily inspections were added to the automated work management system to ensure the inspection is carried out with evidence recorded electronically.			
Was this non-compliance previously reported to DWER?			
No			
Reported to DWER verbally		Date:	
Reported to DWER		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.



Date:		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.